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Green Infrastructure Statement

Llanelli Central East Premier Inn

On behalf of Premier Inn Hotels Ltd

AUGUST 2024

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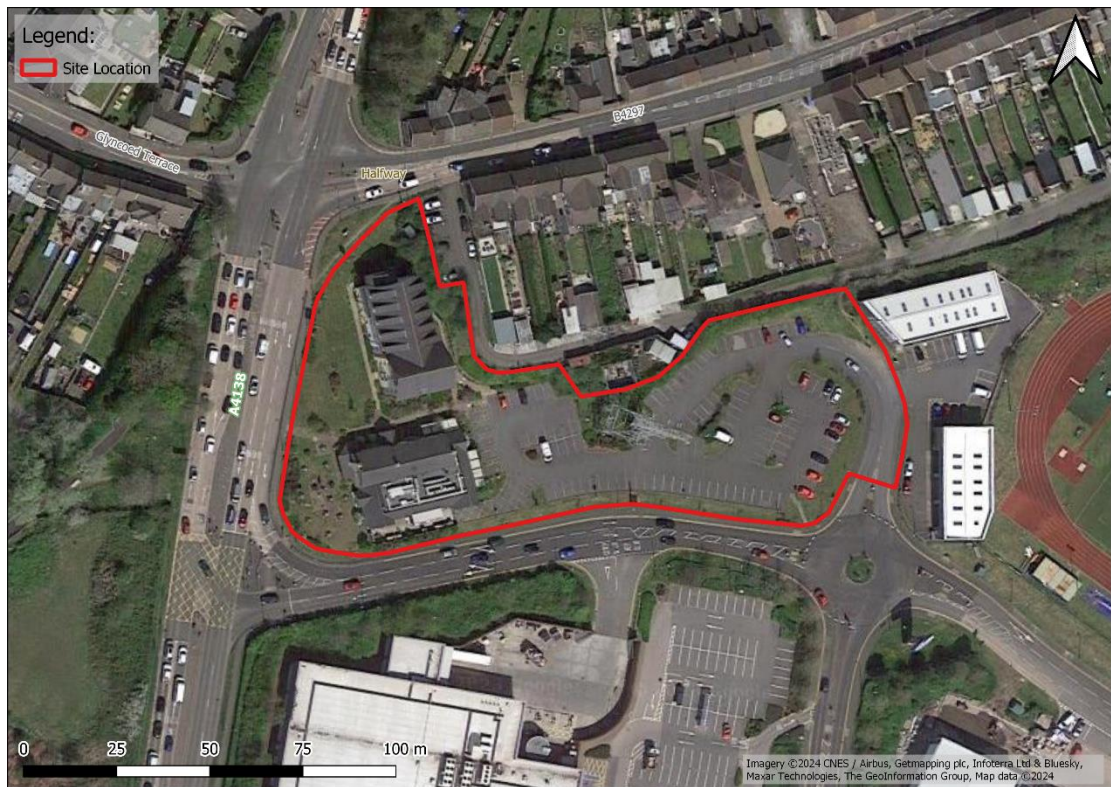
I INTRODUCTION

- I.1 This Green Infrastructure Statement has been prepared by Walsingham Planning on behalf of Premier Inn Hotels Ltd in relation to a proposed development at the Llanelli Central East Premier Inn (PI), within the settlement of Llanelli.

2 SITE CONTEXT

- 2.1 The site relates to the Llanelli Central East Premier Inn located off Llandafen Rd within the town of Llanelli. The existing Premier Inn is a 4-storey hotel providing 50 bedrooms with an on-site Beefeater restaurant alongside 110 on-site parking spaces.
- 2.2 The site is located on the eastern side of the A4138 and is adjacent to Pemberton Retail Park within the town of Llanelli. This building resides within the development limits of the settlement and comprises of two main elements, the 50-bedroom Premier Inn hotel and the separate Beefeater restaurant. The restaurant and hotel are adjacent and are not connected. The site area is approximately 0.82ha.
- 2.3 Due to the location of the site near an existing retail park the site is predominantly surrounded by other commercial and retail sites.
- 2.4 The Site has a number of trees and hedgerows, the majority of which were planted as part of the redevelopment of the site under planning application S/16215. The site is not subject to any TPOs or additional tree protection measures.
- 2.5 The Afon Dafen is located approximately 150m west of the proposed development on the other side of the A4138. Rivers and streams are a Priority Habitat in Wales under Section 7 of the Environment (Wales) Act 2016.
- 2.6 Figure 1 below provides an aerial image of the site and its immediate context.

Figure 1: Site Context Plan (Google Earth Satellite Image)



2.7 Regarding existing on-site habitats, the site is characterised by the following:

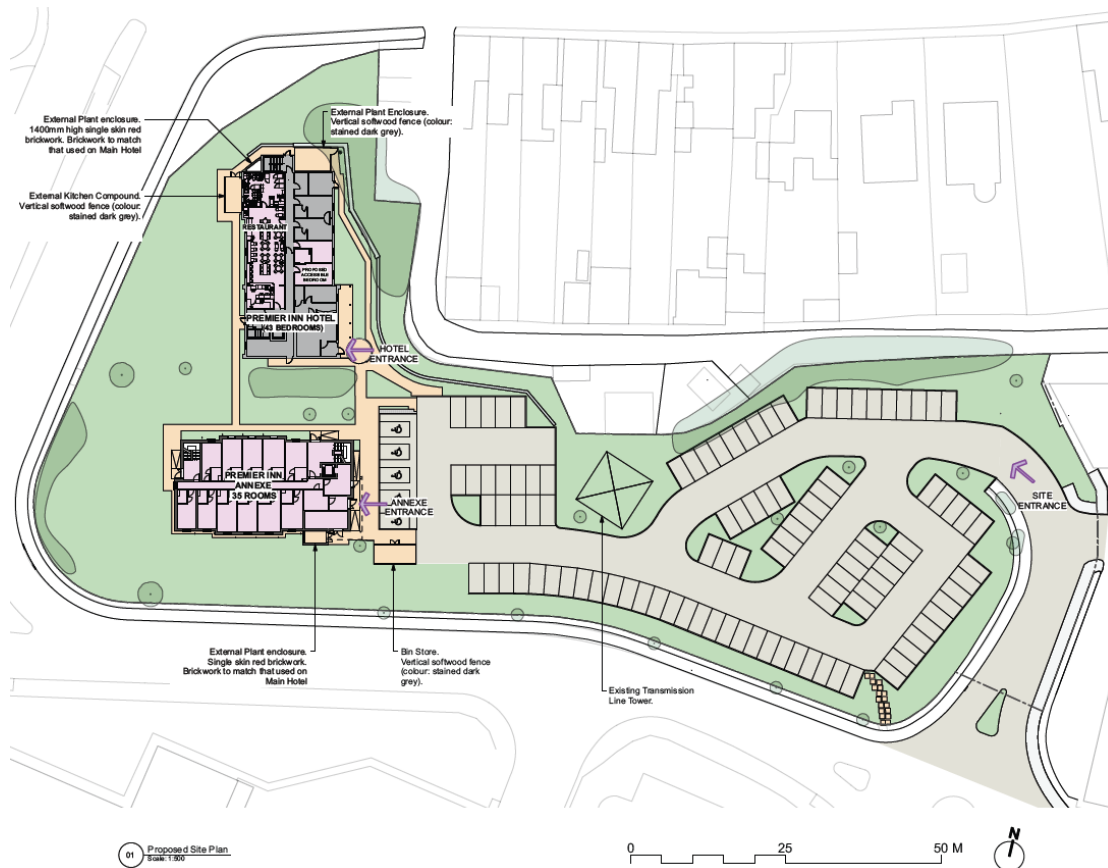
- UI - Built-up areas and gardens [introduced shrubs 847, scattered trees 32].
- u1b5 – Buildings [815 commercial building].
- g4 - modified grassland.

2.8 There are no designated sites within or adjoining the site. There are no statutory designated sites within 10km of the site.

3 THE PROPOSAL

- 3.1 The proposal includes the “*demolition of existing hotel restaurant and replacement with new building providing additional hotel bedrooms and breakfast room, together with alterations to the car park and all associated works*”. The proposal would create additional hotel accommodation for the PI in the form of a new hotel block on the site and include a breakfast room within the existing hotel building.
- 3.2 The proposed extension will be located to the south west of the site where existing beefeater restaurant is currently located. The proposed three-storey hotel block will provide 35 bedrooms.
- 3.3 The proposed hotel block will measure approximately 28.3m long x 15.8m wide x 13.1m high. The proposed hotel block will be served by an air conditioning and heat pumps which requires an external plant area. This would be located at the ground floor level to the southern elevation of the extension. Additionally, a separate bin store is proposed to serve the proposed hotel block which is located to the south east of the proposed hotel block. Figure 2 shows the proposed layout for the scheme.

Figure 2: Proposed Site Layout



- 3.4 The proposed hotel block will be located within the footprint of the existing Beefeater restaurant. All existing trees will be retained. The proposed hotel block has a smaller footprint than the restaurant and areas of existing hardstanding will be landscaped as part of the proposal increasing the modified grassland habitat and native shrubs on the site.

4 POLICY CONTEXT

(A) PLANNING POLICY WALES (PPW)

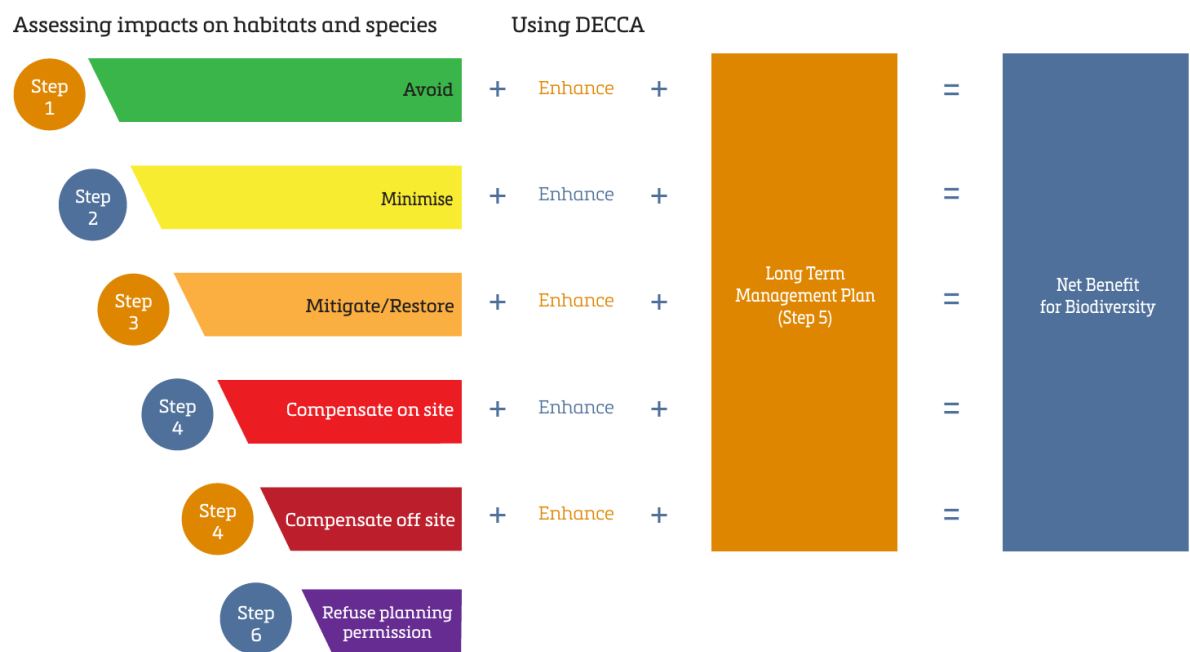
4.2 Chapter 6 of PPW, outlines under paragraph 6.4.12 that a Green Infrastructure Statement is required for submission alongside planning applications to demonstrate the proposal has followed the step-wise approach.

4.3 PPW seeks to ensure all development proposals deliver net benefit for biodiversity and improve the resilience of ecosystems. Biodiversity enhancement must be of a scale and nature which is proportionate to the development. The step-wise approach to biodiversity requires development proposals to follow the below sequence:

- 1. Avoid
- 2. Minimise
- 3. Mitigate
- 4. Compensate

4.4 This is further outlined in Figure 1 below:

Figure 3: Step-wise Approach (Source: Welsh Government, 2024)



5 ECOLOGY AND GREEN INFRASTRUCTURE BASELINE

- 5.1 To establish the ecological baseline of the Site a desk-study and Extended Phase I Habitat survey was undertaken during July 2024 by a qualified professional; Rebecca Howells BSc (Hons), Senior Consultant.

(A) HABITATS

- 5.2 The site is characterised by a Premier Inn Hotel building and adjacent separate restaurant alongside associated car parking and landscaping. The local environment includes commercial and residential areas, managed grasslands and small parcels of woodland. There are no ponds within 500m. The Site contains the following habitats:

- UI - Built-up areas and gardens [introduced shrubs 847, scattered trees 32].
- u1b5 – Buildings [815 commercial building].
- g4 - modified grassland.

- 5.3 The habitats recorded on the site are common, being prevalent at both the local and national level. Consequently, the ecological value of these habitats is considered low.

(B) DESIGNATED SITES

- 5.4 There are no designated sites on or adjacent to the site. There are no statutory designated sites within 10km of the site.
- 5.5 The Afon Dafen was located approximately 150m west of the proposed development on the other side of the A4138. Rivers and streams are a Priority Habitat in Wales under Section 7 of the Environment (Wales) Act 2016.

(C) PROTECTED SPECIES

- 5.6 There was no conclusive evidence that the Site hosts any invertebrates, birds, reptiles, amphibians, badgers, otters, water vole, dormouse or hedgehogs. However, the habitats on site likely provide foraging and commuting opportunities for a variety of species.
- 5.7 The table below summarises the likely presence of protected species onsite:

Species Type	Summary	Impact	Mitigation / Enhancement
Invertebrates	No habitat for protected or notable invertebrates is found on site. Presence of introduced shrubs, amenity grassland and scattered trees provides foraging habitat for common invertebrates.	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None
Bats	Potential roost features located on the site are considered to have low value to support roosting bats.	<ul style="list-style-type: none"> Existing building features low value to support bat roosts. Proposed development may lead to an increase in the amount of current lighting of surrounding habitats or the retained building without mitigation. 	<ul style="list-style-type: none"> Bat emergence survey prior to commencement.
Birds	No evidence of nesting birds was identified on the building or vegetation on site; however, birds could use the buildings and vegetation within the site for nesting or foraging.	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> x2 Bird boxes
Reptiles	None	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None
Amphibians	None	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None
Badger	None	<ul style="list-style-type: none"> None 	None
Riparian animals	None	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None
Hazel Dormouse	None	None	None
Hedgehog	The habitat recorded onsite provides a small area of suitable, albeit limited commuting and foraging opportunities for hedgehogs in the form of modified gardens and introduced shrub.	<ul style="list-style-type: none"> None after construction. Construction activities could result in the death or injury of hedgehogs, if present. 	<ul style="list-style-type: none"> Precautionary mitigation during construction works. Planting fruit bearing trees and species-rich grassland to increase foraging opportunities Creation of brash piles or installation of

			hedgehog houses in shady areas.
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6 GREEN INFRASTRUCTURE STRATEGY

- 6.1 In respect of the ecological/GI resource present within and adjacent to the Site, the proposed development has been designed to retain and protect the valued resources listed above and in so doing, deliver net benefits to biodiversity in accordance with Chapter 6 of PPW. This is achieved through adoption of a step-wise approach which ensures that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort, compensated for, with enhancement secured by delivering biodiversity benefits onsite, over and above that required to mitigate or compensate for any negative impact.
- 6.2 The proposal relates to a brownfield site which is in active use and is located within a wider urban area resulting in the ecological value of the site being considered low. However, the site includes existing trees, modified grassland and shrubs which do represent a potential habitat. No natural habitats on site will be lost as a result of the proposed development.
- 6.3 PPW advises that biodiversity enhancements can be delivered through the step-wise approach via attaching planning conditions and/or other obligations to a planning permission.
- 6.4 Proposed enhancements include:
- Native wildflower planting
 - Insect hotels
 - Log piles,
 - Planting fruit bearing trees and species-rich grassland to increase foraging opportunities
 - Hedgehog Houses
 - x2 Bird boxes.
- 6.5 The above benefits can be delivered via an Ecological Mitigation and Enhancement Plan. To ensure the proposal delivers net benefits for biodiversity, the following documents are recommended to be conditioned to a recommendation for approval:
- Ecological Mitigation and Enhancement Plan.
 - Low impact lighting strategy.
- 6.6 In addition to the above it is also proposed a bat emergence survey is conducted prior to the commencement of any works on site. Although the existing hotel and restaurant buildings are

unlikely to support roosting bats, an emergence survey is recommended to confirm they are not present prior to any works being undertaken. Due to the low suitability of the existing building to accommodate bats it is considered appropriate to condition this survey.

- 6.7 The proposal is supported by a Landscape Strategy Plan and Landscape Planting Specification. This details native shrubs will be planted around the proposed hotel block and the original hardstanding relating to the existing restaurant on the site will be partially replaced by modified grassland enhancing the green infrastructure on the site.

7 CONCLUSION

- 7.1 The proposed development has been informed by the step-wise approach. The PEA submitted in support of this application identifies the habitats found on the site and potential implications for habitats located within close proximity. Furthermore, the Site has been assessed for its ability to support wildlife and mitigations and enhancements recommended accordingly.
- 7.2 The proposal provides a series of enhancements outlined in this statement which retain and protect the valued resources identified within the site resulting in a scheme which delivers net benefits to biodiversity in accordance with Chapter 6 of PPW.
- 7.3 The protections and enhancements for the identified ecological value on the site can be appropriately secured by condition through the provision of an Ecological Mitigation and Enhancement Plan and bat emergence survey.