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SPECIALIST PLANNING & HERITAGE CONSULTANTS

Planning Statement

Llanelli Central East Premier Inn

On behalf of Premier Inn Ltd.

AUGUST 2024

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I INTRODUCTION

I.1 This Statement has been prepared by Walsingham Planning to accompany a planning application by Premier Inn Hotels Ltd to expand the hotel accommodation offer at the Llanelli Central East Premier Inn (PI), within the Llanelli settlement. The proposal is located within the Carmarthenshire County Council area and would result in a net increase of 28 ensuite bedrooms with associated landscaping.

I.2 Premier Inn has identified a considerable demand for additional budget hotel accommodation in this location. It is also seeking to add an ancillary breakfast room within the existing hotel to ensure it best fits the needs of customers.

I.3 The applicant therefore seeks consent for the following:

“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”.

I.4 The proposal for additional bedrooms and an adjusted restaurant proposition would meet Premier Inn’s operational requirements at the location and help to address increased bedroom demand.

I.5 In addition to this Planning Statement, the application is supported by the following documents and drawings:

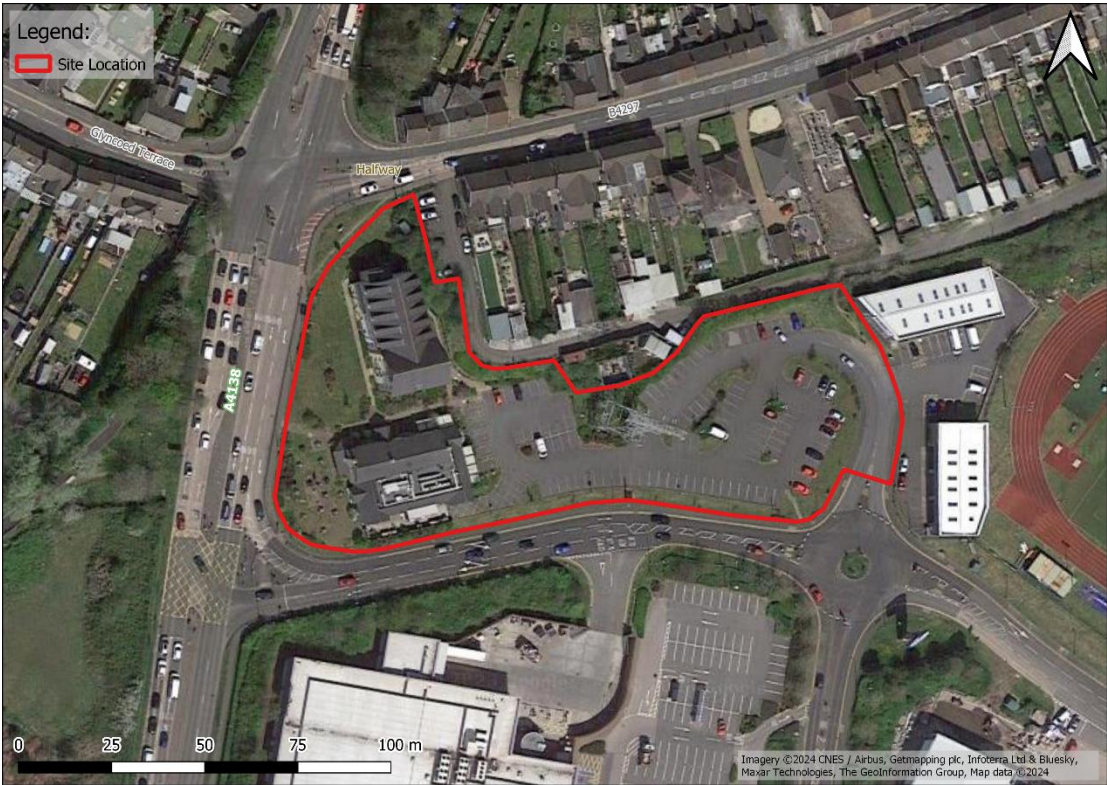
- Cover Letter (Walsingham Planning)
- Planning Statement (Walsingham Planning)
- Site Location Plan (Walsingham Planning)
- Design and Access Statement (Axiom Architects)
- 6127 - P -001-A Existing Location Plan (Axiom Architects)
- 6127 - P -002-A Existing Site Plan (Axiom Architects)
- 6127 - P -100-A Existing Ground Floor Plan (Axiom Architects)
- 6127 - P -101-A Existing First Floor Plan (Axiom Architects)
- 6127 - P -102-A Existing Second Floor Plan (Axiom Architects)
- 6127 - P -103-A Existing third Floor Plan (Axiom Architects)
- 6127 - P -104 Existing Roof Plan (Axiom Architects)
- 6127 - P -200-A Existing Elevations (Axiom Architects)

- 6127 - P -201 Existing Elevations (Axiom Architects)
- 6127 - P -010-D Proposed Site Plan (Axiom Architects)
- 6127 - P -110-C Proposed Ground Floor Plan (Axiom Architects)
- 6127 - P -111-A Proposed First Floor Plan (Axiom Architects)
- 6127 - P -112-A Proposed Second Floor Plan (Axiom Architects)
- 6127 - P -113-C Proposed Roof Plan (Axiom Architects)
- 6127 - P -210-C Proposed Elevations & Sections (Axiom Architects)
- 6127 - P -211-C Proposed Elevations & Sections (Axiom Architects)
- 6127-P-600 Proposed Cycle Parking
- Transport Statement (RGP)
- Travel Plan (RGP)
- Tree Survey (Arbtech)
- Tree Protection Plan (Arbtech)
- Arboricultural Impacts Assessment (Arbtech)
- Arboricultural Method Statement (Arbtech)
- Preliminary Ecological Appraisal (Arbtech)
- Green Infrastructure Statement (Walsingham Planning)
- Landscape Strategy Layout (Indigo Landscape Architects)
- Landscape Planting Specification (Indigo Landscape Architects)
- Drainage Statement & Strategy (Simpson TWS)
- Energy Strategy (Thornley & Lumb Partnership Ltd)
- Sustainability Statement (Whitbread Plc)

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 is serviced by public transport and has a bus stop located to the north on Llandafen Rd. The site is also only a 28-minute bus or 38-minute walk away from the Llanelli train station which is under Transport for Wales and GWR and mainly services links between Swansea and Cardiff and the wider South West Wales region.
- 2.5 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.
- 2.6 Figure 1 below provides an aerial image of the site and its immediate context.

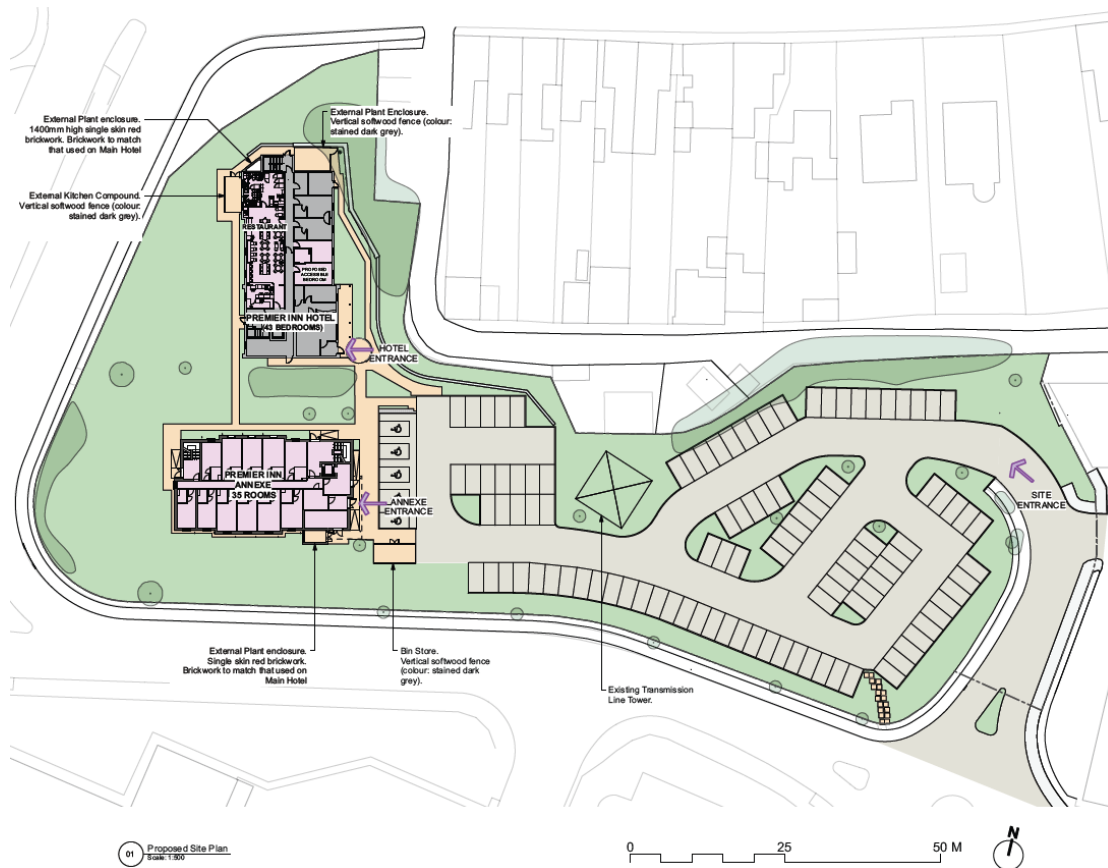
Figure 1: Site Context Plan (Google Earth Satellite Image)



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. The proposed breakfast room would provide 56 covers and would be for the use of guest of the hotel. Consequently, it is considered ancillary to the primary CI hotel use. The inclusion of the breakfast room in the existing building will result in the loss of seven bedrooms resulting in a total net gain of 28 bedrooms to the hotel through the proposed new hotel block.
- 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

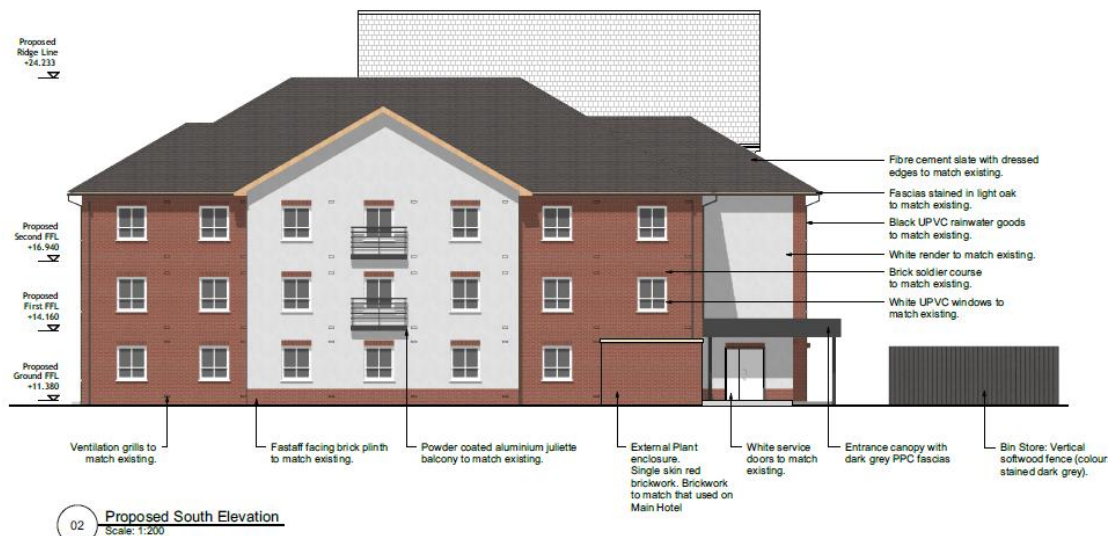


3.4 The proposed external finishes to the hotel block include the following:

- Walls: Lightly-textured render (colour: White) to match existing. Falstaff Facing Brick (colour: antique) to match existing.
- Windows and doors: UPVC frames, sills, cappings, trims etc. (colour: white) to match existing.
- Service Doors: Aluminium/Timber (colour: white) to match existing.
- Juliette balconies: Powder coated aluminium (colour: dark grey) to match existing.
- Roof: Pitched roof: Birkdale E3000 fibre cement slate with dressed edges (colour: grey) to match existing.
- Fascias: stained in light oak to match existing.
- Soffits: stained in light oak to match existing.
- Bin Store / Plant Enclosures: Vertical softwood fence (colour: stained dark grey).
- Plant Enclosure: Single-leaf Falstaff Facing Brick in antique to match main facade.

- 3.5 The proposed finishes are similar to the existing hotel and complement the existing external finishes found within the site. Figure 3 outlines the proposed elevation facing towards the opposing supermarket to the south.

Figure 3: Proposed Southern Elevation



- 3.6 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. Additionally, all car parking spaces will be retained resulting in 110 parking spaces to serve the expanded hotel. Five car parking spaces will be accessible out of the 110 spaces on the site.
- 3.7 The proposal includes the installation of three covered Sheffield style bicycle stands resulting a total of 6 bicycle parking spaces.

4 PLANNING HISTORY

- 4.1 The application site is located within Carmarthenshire County Council. According to the Council's online planning register there are several planning applications which relate to the Site. The relevant planning application to this proposal is listed in the table below:

Application Ref.	Location	Proposal	Decision
S/16215	Land to the N.E. of Trostre roundabout, Pemberton, Llanelli, Carmarthenshire	Erection of 50 bed premier travel inn hotel and beefeater restaurant/public house and associated access, car parking and landscaping	Approved 28th June 2007

- 4.2 The above planning consent has been implemented at the site. The operative consent for the existing use on the site is provided by permission granted under S/16215. There are no extant conditions which would affect the proposal.

(A) PRE-APPLICATION ADVICE

- 4.3 Carmarthenshire County Council do offer pre-application advice which is encouraged as it helps to front load discussions. However, no pre-application consultation with the Council was undertaken to inform the proposal. This is due to the scale of the proposed works which require a pre-application consultation with interested parties including statutory consultees. Response to the Pre-application consultation (PAC) will be outlined and considered within the PAC report.

5 PLANNING POLICY

(A) NATIONAL PLANNING POLICY AND GUIDANCE

Planning Policy Wales (PPW)

5.2 Planning Policy Wales (PPW) is the main national planning policy document. Edition 12 of PPW was published in February 2024. PPW sets out the national planning policy approach to ensure the requirements of the Well-being and Future Generations Act (WBFGA) are met through adopting a placemaking approach to plan making, planning policy and decision making. Placemaking is defined in national policy as *“a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well-being in the widest sense.”* (PPW, p.14). The key relevant extracts to the proposal are:

- Para.4.1.50 - Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed.
- Para.4.3.41 - The economic and social function of local shops, village shops and public houses should be taken into account when considering applications for a change of use into residential or other uses.
- Para.4.3.20 - Edge-of-centre or out-of-centre sites should be accessible by a choice of public and private modes of travel. New out-of-centre retail developments or extensions to existing out-of-centre developments should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of those retail and commercial centres that would otherwise serve the community, and should not be allowed if they would be likely to put development plan retail strategy at risk. The extent of a sequential test should be agreed by pre-application discussion between the planning authority and the developer.
- Para.4.3.21 - The sequential approach applies to retail and all other uses complementary to retail and commercial centres. Other complementary uses include, for example, financial and professional services (A2), food and drink (A3), offices (B1), hotels (C1), educational and other non-residential establishments (D1), leisure (D2) and certain other uses such as launderettes and theatres.
- Para.5.4.2 - Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services... The Welsh Government seeks to maximise

opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim.

- Para.5.5.7 - Planning authorities should adopt positive approaches to proposals which utilise previously developed or disused land and water bodies for tourism uses, particularly in relation to urban regeneration.

Technical Advice Notes (TANs)

- 5.3 In addition to PPW, Welsh Government have produced TANs which provide further guidance on national policy for developers and Planning Authorities. The following TANs are considered most relevant to the proposal:
- 5.4 **TAN 4 Retail and Commercial Development 2016** - Provides technical guidance on proposals relating to retail and commercial development. Outlines the key considerations which should inform the sequential test approach which includes an assessment of suitability and availability. It notes that Developers should be flexible and innovative about the format, design and scale of proposed development and the amount of car parking needed, tailoring these to fit local circumstances.
- 5.5 **TAN 13 Tourism 1997** – The document supports moderately sized extensions to an existing hotel or public house, including the addition of bedroom accommodation which can help ensure the future viability of such businesses. Using the potential of the site or building may allow local as well as tourism needs to be met. However, there should not be a disproportionate increase in scale.
- 5.6 Regarding car parking and access, these requirements may vary according to the scale and type of activity for which an hotel is intended and its location. In urban areas the amount of parking provided is likely also to be related to public transport facilities. Access and waiting areas should be designed to avoid congestion and minimise turning movements.

Future Wales: The National Plan 2040

- 5.7 Future Wales is the National Development Plan for Wales guiding development to 2040. Future Wales provides a clear vision of Wales in 2040 and sets out the steps required to get there and includes a set of 11 inter-related and inter-dependent outcomes based on national planning principles which will improve places and well-being across Wales. These outcomes are supported by policies. The key policy relating to the proposal is considered to be:

- **Policy 1 – Where Wales will grow** – This policy identifies the area where Wales will be expected to grow employment and housing opportunities. Llanelli is identified as a national growth area.
- **Policy 6 – Town Centre First** – this policy states that significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres and be informed by a sequential test approach.
- **Policy 28 – National Growth Area – Swansea Bay and Llanelli** – this policy provides additional details on the expectations of the identified national growth areas. LDPs should recognise national growth areas and focus strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure in these locations.

(B) LOCAL PLANNING POLICY AND GUIDANCE

Adopted Local Development Plan

5.8 The Carmarthenshire Local Development Plan 2006-2021 is the currently adopted plan for the Council area adopted on 10th December 2014. The period of the adopted LDP ended in 2021. However, Planning (Wales) Act 2015 introduced provisions specifying the period to which a plan has effect and providing that it shall cease to be the LDP at the end of the specified period. The provisions in the Act regarding the period to which a plan has effect were commenced on 4 January 2016. These provisions do not have retrospective effect. This means that the provisions do not apply to LDPs adopted prior to this date. Therefore, LDP 2006-2021 is still the main planning policy document for the Council area. The following policies are considered relevant to the proposal:

- **SP1 Sustainable Places and Spaces** – the policy outlines the key principles which should inform development proposals to ensure they create sustainable places. This includes the efficient use of previously developed land.
- **SP2 Climate Change** – the policy promotes the use of low carbon solutions which will be supported by the Council.
- **SP3 Sustainable Distribution – Settlement Framework** – Llanelli is identified as a growth area for the Council.
- **SP15 Tourism and the Visitor Economy** – Extensions to existing facilities will be supported where they are within Growth Areas. Extensions should be subordinate in scale and function to the existing facility.

- Policy GP2 Development Limits – This policy defines the limits of settlements where new development will be supported subject to relevant policies and other material considerations.
- Policy GP6 Extensions – This policy sets out the criteria that new extensions will need to comply with, including that they would not result in inadequate areas of parking.
- Policy RT8 Local Shops and Facilities – Seeks to protect against the loss of shops and facilities outside of defined retail centres in Growth Areas and Service Centres. Loss of existing local shops and/or services will be permitted where a similar use is within a convenient walking distance and its loss would not be detrimental to the social and economic fabric of the community. Alternatively, the loss can be permitted where all reasonable attempts have been made to market the business for sale or let over a 12-month period and have failed.
- Policy TSM4 Visitor Accommodation – Proposals for new tourist accommodation will be supported within the development limits of defined settlements subject to the relevant criterion under Policy SP15.

Adopted Supplementary Planning Guidance (SPG)

5.9 The following SPGs are considered relevant to the proposal:

- Placemaking Design SPG (September 2016)
- Planning Obligations SPG (December 2014)

6 OTHER MATERIAL CONSIDERATIONS

2nd Deposit Local Development Plan (February 2023)

6.1 The Council are progressing a LDP review and have produced a second deposit revised LDP which was published for consultation on 17 February 2023 with the consultation closing on the 14 April 2023. The current adopted plan covered the period from 2006-2021. It remains the adopted LDP, however, as the LDP review has progressed to deposit stage weight can be attributed to the policies within the 2nd Deposit LDP. This amount of weight attributed to these draft policies will need to be assessed in light of national planning policies, the adopted plan and the potential impacts of the proposed development. The following policies are considered relevant to the proposal:

- SP2: Retail and Town Centres – defines Llanelli as a Mid Order Town Centre.
- RTC1: Protection of Local Shops and Facilities – Seeks to protect against the loss local shops and facilities including public houses outside town centres. Proposals which result in a loss will be permitted where it would not be detrimental to the social and economic fabric of the community; a similar compatible use available for customers within the settlement or within a convenient walking distance. Alternatively, the loss can be permitted where all reasonable attempts have been made to market the business for sale or let over a 12-month period and have failed.
- SP3: Sustainable Distribution – Settlement Framework – Llanelli is identified as a Tier 1 Principal Centre in cluster 2.
- SD1: Development Limits – This policy defines the limits of settlements where new development will be supported subject to relevant policies and other material considerations.
- INF1: Planning Obligations – This policy confirms planning obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable.
- SP 11: The Visitor Economy – Supports proposals for tourism/visitor economy where they are high quality design, protect and enhance the natural environment, add value to the visitor economy and are sustainably located.
- VE1: Visitor Attractions and Facilities - appropriate extensions to existing facilities will be permitted, where they are located within, or directly related to a defined settlement.

- VE2: Holiday Accommodation - appropriate extensions to existing facilities will be permitted, where they are located within, or directly related to a defined settlement.
- SP 12: Placemaking and Sustainable Places – Provides the criteria proposals need to address to demonstrate to be considered sustainable development.
- PSD1: Effective Design Solutions: Sustainability and Placemaking - the policy seeks to ensure development proposals exhibit high quality and sustainable design principles which are reflective of the local context.
- PSD3: Green and Blue Infrastructure Network - Planning applications will require submission of surveys and assessments appropriate to the site and nature of development, to establish a baseline for Green and Blue Infrastructure design solutions.

7 PLANNING ASSESSMENT

(A) PRINCIPLE OF DEVELOPMENT

- 7.2 A hotel is classified as a complimentary retail centre use in PPW (Paragraph 4.3.21 of PPW refers). Complimentary uses would normally require the sequential test to be passed. However, the proposal is located within the identified growth area of Llanelli and lies within the development limits of the settlement. The existing Hotel is located in an out-of-centre location on one of the main roads in and out of Llanelli being accessed off the A4138 a primary road route which links to junction 48 of the M4. The hotel fulfils an important roadside function in providing overnight accommodation for business and leisure travellers using the visiting Llanelli and accessing the strategic road network (M4). It would not affect hotels within the nearby town centres which are providing for a very different part of the market. A sequential test is not therefore considered necessary or appropriate in this instance.
- 7.3 Although the proposal is considered to be major development, the net increase in bedrooms is relatively minor (28 rooms). This results in an overall tourism accommodation provision at the site of 78 bedrooms which is considered to be a minor increase in hotel provision at the site which would not detract from existing town centre uses by virtue of its small scale and relating to an established out-of-centre use.
- 7.4 The proposal would result in the expansion of the existing hotel use on a previously developed site, representing a more efficient use of the brownfield site. Local policies SP3 Sustainable Distribution and SP15 Tourism and the Visitor Economy support new tourism development within growth areas including Llanelli. Consequently, it is considered the proposal represents an appropriate increase in hotel accommodation in this location supported by PPW under paragraph 5.5.7 and local planning policies SP3 and SP15.

(B) DESIGN

- 7.5 The proposal represents a sympathetic design to the original building through the use of a similar form and materials with the existing hotel building. The height of the proposal does not exceed the existing ridge height of the hotel building ensuring the proposal remains subservient to the existing hotel. Furthermore, the external design finishes have been chosen to match the existing, where possible, to ensure the proposal is compatible with the existing design of the hotel.

- 7.6 Although the proposal's roof design is different to the existing hotel, the use of a different roof profile provides a transition between existing and proposed creating a visual break between the original and proposed development. The primarily pitched roof and gable ends of the proposed hotel block is considered compatible with the existing roof profiles on the site and the wider area.
- 7.7 Regarding the impact on surrounding uses and properties, the proposed hotel block is located in an area of the site which is detached from neighbouring properties and uses. The nearest neighbouring use is the opposing supermarket which is over 20m away from the proposed development. The nearest residential property is to the north located approximately 30m from the proposed development. In both instances the separation distance between neighbouring uses and properties is considered sufficient to ensure the proposal does not detract from public and residential amenity experienced by users and occupiers of the adjacent buildings.
- 7.8 Therefore, the proposed design is considered to be in accordance with the criteria outlined in Policies SPI5, GPI, and TSM4.

(C) TRANSPORT & PARKING

- 7.9 The proposed hotel block would be situated within the existing footprint of the restaurant and would not result in the loss of existing car parking provision. All the existing 110 car parking spaces will be retained.
- 7.10 The Council uses the County Surveyor Society Wales' (CSS) 'Wales Parking Standards' 2014 to inform requirements for parking provision for new development. Regarding hotel uses the Standards require 1 space per bedroom. The proposal would result in a hotel with 78 bedrooms requiring 78 parking spaces, the existing car park provide 110 spaces ensuring there is sufficient parking capacity to accommodate the development.
- 7.11 The proposal also includes six bicycle parking spaces which are provided though the inclusion of 3 Sheffield style stands which are located in an undercover bicycle shelter.
- 7.12 In terms of the impact of the proposed development on the wider highway network, the removal of the existing restaurant to accommodate the proposed hotel block would result in a decrease in two-way movements across the course of a typical day associated with the site in the order of 193 movements. This is anticipated as a result of the removal of the associated

restaurant and replacement with a 'Guest Restaurant', which would not generate external trade.

- 7.13 The proposal is supported by a Travel Plan which seeks to promote a change in travel habits for users of the site. The Travel Plan aims to achieve an increase in the proportion of staff travelling to the site by active modes of travel by 10% at the end of year 5 and an increase of guest arrivals by sustainable transport by 10% by the end of year 5.
- 7.14 The proposed development would not result in an under provision of car parking, it would not have a detrimental impact on the wider highway network and would seek to promote sustainable forms of travel through the inclusion of bicycle parking and implementation of the measures in the Travel Plan. Therefore, the proposal is considered to be in accordance with PPW and local planning policies SPI and GPI.

(D) ECOLOGY & TREES

- 7.15 The proposal relates to a brownfield site which is in active use and is located within a wider commercial area resulting in the ecological value of the site being considered low. However, 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 which do represent a potential habitat. Consequently, the proposal is supported by a Preliminary Ecological Assessment (PEA). The PEA confirms the habitats present on the site which include:

- U1 - Built-up areas and gardens [introduced shrubs 847, scattered trees 32]
- u1b5 – Buildings [815 commercial building]
- g4 - modified grassland

- 7.16 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. It is noted the site is not subject to any TPOs or additional tree protection measures. No trees will be removed as part of the proposal.
- 7.17 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. There are no statutory designated sites within 10km of the proposal.

7.18 In terms of priority species, 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. Consequently, the following enhancements are recommended:

- Native wildflower planting
- Insect hotels
- Log piles,
- Planting fruit bearing trees and species-rich grassland to increase foraging opportunities.
- Hedgehog Houses
- x2 Bird boxes.

7.19 It is considered the above enhancements can be secured through appropriately worded conditions.

7.20 Regarding the presence of bats, the PEA notes the existing hotel building provides very limited suitability for roosting bats. However, the proposal would involve works which could disrupt existing bat roosts in the existing buildings. Consequently, a bat emergence survey is recommended to confirm there are no active bat roosts in the buildings prior to the works commencing. Due to the low probability of bat activity on the site it is considered appropriate that this survey can be conditioned to a consent.

7.21 Consequently, the proposal appropriately addresses the ecological considerations on the site and provides a substantial contribution to improved natural habitats on the site in accordance with both PPW and Policy EQ4.

(E) FLOODING AND DRAINAGE

7.22 The Development Advice Map (DAM) and associated planning policy TAN15: Development and Flood Risk is the current framework for assessing flood risk to and from new development. The Welsh Government is due to implement a revised TAN15 during 2023. This will be supported by the Flood Map for Planning, which shows how climate change will affect flood risk extents over the next century.

- 7.23 The Flood Map for Planning has no official status until the Welsh Government implements the revised TANI5. However, it represents the best available information on flood risk and Natural Resources Wales will continue to use this to inform their planning advice.
- 7.24 The Site is within Flood Zone A under the DAM data and therefore is at no risk of fluvial or coastal/tidal flooding. Regarding the Flood Map for Planning the site is within Flood Zone 1 and is at low risk from river, sea and surface water flooding.
- 7.25 Under both data sources, development of the site would be considered appropriate in terms of flood risk.
- 7.26 Regarding drainage, the existing surface water network provides sufficient capacity for the development as a 30% betterment in runoff rates and volumes will be present on-site post-development. This drainage network will ensure no flooding occurs on site for all events up to and including a 1 in 100-year event with a 40% allowance for climate change. The annexe will connect into the existing foul drainage network which currently serves the Beefeater restaurant. The reduced flows from the annexe will discharge off site to the Welsh Water foul sewer located east of the development via a gravity connection as per the current situation.

(F) ENERGY

- 7.27 The proposal is supported by an Energy Strategy which outlines how the design of the development has been informed by reducing carbon emissions and improving energy efficiency. The Energy Strategy concludes that the overall carbon emissions associated with the development will be reduced by 12.9 CO₂ tonnes per annum (TPA) which is a reduction of 77.1% on the latest baseline provided Building Regulations Approved Document Part L (2022). This will be primarily achieved through efficient building fabric construction and the use of air source heat pumps for space and water heating.
- 7.28 Consequently, proposed carbon reduction strategy implemented in the design of the development will minimise the energy usage of the building and carbon emissions ensuring the proposed extension provide a sustainable low energy building in accordance with local plan policy SP2.

8 CONCLUSION

- 8.1 This Planning Statement alongside the documents and information supporting the proposal demonstrate that the proposed development is in accordance with the relevant policies of the local development plan.
- 8.2 The proposed development will provide additional hotel bedrooms contributing to the economic growth of the area and improving the hotel capacity. The proposed hotel block reflects the character of the wider area representing a sustainable form of development. The increase in hotel accommodation on the site is relatively minor in scale.
- 8.3 The proposed hotel block has been carefully designed to make more efficient use of the existing site and to match the existing hotel in terms of scale and materials to achieve a good quality design.
- 8.4 The proposed hotel block would not increase the risk of flooding to the hotel or any other buildings within the area. Appropriate surface water drainage provision has been incorporated into the proposals.
- 8.5 An appropriate amount of car parking would be retained for the hotel and the neighbouring restaurant.
- 8.6 Therefore, the proposal represents sustainable development in accordance with PPW and Local Planning Policies and planning permission should be granted.