

REPORT N° 70029917-EIASCR

LLANELLI TOWN CENTRE LOCAL DEVELOPMENT ORDER

ENVIRONMENTAL IMPACT ASSESSMENT
SCREENING REPORT

SEPTEMBER 2017

**LLANELLI TOWN CENTRE
LOCAL DEVELOPMENT ORDER
ENVIRONMENTAL IMPACT
ASSESSMENT SCREENING REPORT**

Carmarthenshire County Council

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1 INTRODUCTION

1.1 PURPOSE OF THIS REPORT

- 1.1.1 WSP has prepared this Environmental Impact Assessment (EIA) Screening Report on behalf of Carmarthenshire County Council (CCC) to support a request for a Screening Opinion from Carmarthenshire County Council Planning Department, under The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, hereafter referred to as the '2017 EIA Regulations'.
- 1.1.2 CCC are proposing to issue a Local Development Order (LDO) for Llanelli Town Centre to facilitate regeneration, increasing occupancy levels and footfall by granting conditional planning permission for specified uses ground and upper floor units. However, it should be noted that there are no current guidelines for assessing the environmental impacts of proposed LDOs; for the purposes of this report, guidance has been taken from Welsh Government Circular 003/2012¹ and the 2017 EIA Regulations, of which the latter applies to projects only.

1.2 LOCAL DEVELOPMENT ORDER

- 1.2.1 An LDO is one of a number of mechanisms that can simplify and speed up the planning process. An LDO grants planning permission for the type of development specified in the Order, and by doing so, may remove the need for a planning application to be made by a developer or occupier for every change in use that currently requires planning permission.
- 1.2.2 The LDO works by exempting some developments from the need to apply for specific planning permission, and those wishing to pursue such opportunities can proceed without the time and cost implications of having to submit a planning application. They also provide certainty to developers by defining up front what development is acceptable and can be undertaken without the need for specific planning permission. A significant benefit to the LDO is that they enable local authorities to shape their local areas by encouraging certain types of development in appropriate areas. An LDO can apply to a specific area, site or development area and permits certain types of development. It should be noted that it does not negate the need to attain any permissions relating to regulations etc that are outside of the planning system – eg building regulations.

1.3 LEGAL FRAMEWORK

- 1.3.1 Applying the EIA Regulations to an LDO is a new process and guidance has not been given as to the requirements and type of assessment required. As this LDO is not an integrated strategic approach that would be covered by Strategic Environmental Assessment, the EIA framework seems the most suitable approach given that there is currently no specific regulatory requirement.
- 1.3.2 For Schedule 1 development, EIA is mandatory. For Schedule 2 development the requirement for EIA is discretionary and only required where the proposed work are likely to give rise to significant environmental impacts. It is Carmarthenshire County Council, as the relevant competent authority to determine whether an EIA is required and the mechanism to determine this is for a formal screening opinion request.
- 1.3.3 The Proposed LDO does not fall within the criteria listed in Schedule 1 of the EIA Regulations. It does fall within Schedule 2 10(b) of the EIA Regulations 'Urban development, including the construction of shopping centres...' The proposed site is approximately 5.5 ha, which exceeds the 1ha threshold outlined in the Schedule and, as such, the need for EIA is subject to Screening Opinion.

1.3.4 The selection criteria outlined in Schedule 3 of the EIA Regulations should to be taken into consideration in determining whether the Proposed Scheme requires EIA. Schedule 3 of the EIA Regulations (Selection Criteria for Screening Schedule 2 Development) requires consideration of the following:

- Characteristics of development;
- Location of development; and
- Types and characteristics of potential impacts.

1.3.5 The following sections of this EIA Screening Report fulfil the requirements of Schedule 3 to assist CCC in reaching a decision on whether EIA is required for the Proposed LDO.

1.4 STRUCTURE OF THE REPORT

1.4.1 The structure of this EIA Screening Report is as follows:

- **Section 1:** Introduction;
- **Section 2:** Approach and Methodology;
- **Section 3:** Characteristics of the Proposed Scheme. In line with Regulation 6 (2) of the 2017 Regulations, section 3 provides;
 - a) a plan sufficient to identify the land; and
 - b) a description of the development, including in particular—
 - (i) a description of the physical characteristics of the development and, where relevant, of demolition works;;
- **Section 4:** Location of the Proposed Scheme. In line with Regulation 6 (2) of the 2017 Regulations, section 4 provides;
 - b) a description of the development, including in particular-
 - ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- **Section 5:** Characteristics of potential effects (including cumulative effects appraisal). . In line with Regulation 6 (2) of the 2017 Regulations, section 5 provides
 - (c) a description of the aspects of the environment likely to be significantly affected by the development;
 - (d) a description of any likely significant effects, to the extent of the information available on those effects, of the proposed development on the environment resulting from—
 - (i) the expected residues and emissions and the production of waste, where relevant;
 - (ii) the use of natural resources, in particular soil, land, water and biodiversity; and
 - (e) such other information or representations as the person making the request may wish to provide or make including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment;
- **Section 6:** Summary.

2 APPROACH AND METHODOLOGY

2.1 APPROACH

2.1.1 The individual projects that will form part of the LDO in themselves would not require EIA, however, as the LDO is providing a framework for the delivery of a number of projects, the overall impact of the combined individual developments should be screened. This request for a screening opinion is supported by information on the potential environmental effects of the Proposed Scheme. It takes into consideration the existing site and baseline conditions, and the development that CCC intends to allow in Llanelli Town Centre together with the management controls that will be applied to the project.

2.2 BASELINE CONDITIONS

2.2.1 A review of baseline conditions for the Site on a topic by topic basis has been undertaken and outlined in Section 4 below. The information is as of September 2017.

2.2.2 The information presented in this report has been obtained through desk-based searches of key publicly available databases, including Multi-Agency Geographical Information Committee (MAGIC) (<http://www.magic.gov.uk/>) and Environment Agency (<http://maps.environment-agency.gov.uk>).

2.2.3 A number of Technical Reports have been produced to inform the content of the LDO, as follows:

- Habitats Regulations Assessment Screening Report²;
- Strategic Flood Consequence Assessment (SFCA)³; and
- Infrastructure Assessment (inc drainage strategy) ⁴.

2.2.4 The findings of these surveys have been reviewed and used to inform this report and are available from the Council.

2.3 REVIEW OF POTENTIAL SIGNIFICANT EFFECTS

2.3.1 The review of potential significant effects associated with the proposal has been undertaken in Section 5 based on the baseline conditions identified in Section 4.

2.3.2 Following the transposition of EIA Directive 2014/52/EU into UK law, Regulation 6.2e allows for the discussion and identification of project specific measures to avoid and / or prevent significant adverse environmental effects. The inclusion of such measures and the extent to which they avoid and / or prevent adverse environmental effects should be considered when formulating an EIA Screening Opinion. The approach of identifying potential mitigation measures at the early stages of project design and the planning process aligns with Institute of Environmental Management & Assessment (IEMA) guidance, Shaping Quality Development⁵.

2.3.3 As such, as part of the review of likely environmental effects, mitigation measures have been considered in order to understand environmental effects associated with the Proposed Scheme. Where mitigation has been identified at this stage, this has been identified in **Table 2-1** below.

Table 2-1 Description of mitigation measures considered

MITIGATION TYPE	DEFINITION OF MITIGATION
Primary Mitigation	Inherent mitigation, comprising fundamental aspect of the project design.
Secondary Mitigation	Foreseeable mitigation, require further input and assessment in order to achieve the desired outcome of the efforts.
Tertiary Mitigation	Inexorable mitigation, in that it would be compulsory regardless of environmental impact assessments.

APPRAISAL OF IN-COMBINATION EFFECTS

2.3.4 In line with Schedule 3, EIA Regulations 2017 the potential for in-combination cumulative effects has been taken into consideration. At present, there is no widely accepted methodology or best practice for the assessment of cumulative effects, although there are a number of guidance documents available.

2.3.5 In order to determine likely in-combination effects, a qualitative assessment based on available information has been completed. The adopted methodology for the appraisal of in-combination effects has been undertaken in three stages, which are outlined below.

STEP 1 - IDENTIFICATION AND EVALUATION OF PROJECTS FOR CONSIDERATION

2.3.6 A review of information held on CCC planning portal has considered all existing and/or approved developments, in line with EIA Regulations 2017.

2.3.7 In order to maintain proportionality a 500m search area will be applied when considering potential committed developments and planning applications that have been refused, withdrawn, submitted but not yet determined or land identified within local development plans will not be considered.

2.3.8 Each of the projects identified will be evaluated in order to determine whether the following criterion is met:

- Is there a concurrent construction or operational phase with the Proposed Scheme?
- Is the project within a relevant geographical boundary to the Proposed Scheme?
- Is there potential that the Proposed Scheme shares common sensitive receptors with the identified committed developments?
- Has the permission been granted within the past five years?

STEP 2 – IDENTIFICATION OF COMMON RECEPTORS

- 2.3.9 The above criterion will be informed by a high level review of planning application documents submitted for each committed development. Where information is not available, assumptions will be made based on professional judgement and clearly stated alongside any uncertainty. Common receptors are evaluated in terms of their broad receptor category in accordance with Schedule 4 Part 1 of the 2017 EIA Regulations, e.g. population or water. The specific receptors are then identified and evaluated. This ensures that in-combination effects are duly considered at the receptor level and a more detailed level of assessment is only undertaken where there is a common receptor and likely effect.

STEP 3 – APPRAISAL OF IN-COMBINATION EFFECTS

- 2.3.10 Once the receptors for assessment has been defined, consideration, where possible is given to their tolerance to effects.
- 2.3.11 The sources of construction or/and operational activities in-combination with the Proposed Scheme are then appraised. In order for there to be a potential in-combination effect, there needs to a potential effect on the same receptor for a similar duration within the overall programmes.
- 2.3.12 The qualitative evaluation at the receptor level provides consideration of the following;
- Combined magnitude or change;
 - Sensitivity / value / importance of the receptor / receiving environment to change; or/and
 - Duration and reversibility of effect.
- 2.3.13 Through a combination of the qualitative evaluation and the mitigation presented, conclusions can be drawn as to the likelihood for significant in-combination environmental effects.

3 CHARACTERISTICS OF THE PROPOSED SCHEME

OVERVIEW

- 3.1.1 CCC is preparing an LDO to aid regeneration of Llanelli town centre. The LDO will grant conditional approval within a defined spatial area for development as specified within the LDO in ground and upper floor units. The LDO is intended to increase occupancy levels and footfall in the town centre and will assist in the delivery of a Regeneration Masterplan.
- 3.1.2 The uses the LDO will permit include shops, financial and professional services, restaurants and cafes, drinking establishments (but not nightclubs), hot food takeaways, business offices, hotels and guest houses, residential dwellings, non-residential institutions, assembly and leisure buildings, laundrettes and taxi businesses. Reference should be made to the schedule of approved uses within the LDO.
- 3.1.3 The Site location and boundary of the LDO is set out in **Appendix A** of this report.

PROJECT AIMS

- 3.1.4 Following a three year period, the LDO will be considered successful if two or more of the following changes have occurred:
- Five or more vacant ground-floor units have been issued with Certificates of Conformity;
 - Annual footfall has increased within the LDO area;
 - The number of vacant ground-floor units has decreased within the LDO area;
 - Three or more upper floor vacant units have been issued with Certificates of Conformity– this includes flats and residential uses.
- 3.1.5 The LDO will be subject to on-going review during this three year period and may be extended or reduced in light of success or failure of the LDO to achieve the above aims. A change of use which has begun during the three year period may continue; however, no new changes will be approved without formal planning permission.

KEY CONDITIONS / MITIGATION MEASURES

- 3.1.6 No change in use permitted by the LDO shall occur until a certificate of conformity has been approved in writing by CCC, following review of proposals.
- 3.1.7 Physical commencement of any change of use permitted by the LDO shall not commence until any conditions / matters identified in the certificate of conformity have been addressed and approved in writing by CCC and relevant consultees and a Commencement Notice Approval issued.
- 3.1.8 The LDO permits change in use, it does not permit change in building structure, size or external appearance.

- 3.1.9 There are a series of pre commencement conditions in the Draft LDO, many of which were developed following consultation with key stakeholders. These conditions also seek to reflect key policy drivers (eg Planning Policy Wales Technical Advice Note 15). Due regard will be given to amending the Draft LDO to reflect any comments made during the public consultation (notably from Dwr Cymru Welsh Water) along with recommendations set out in supporting evidence (eg the LDO Infrastructure Study).
- 3.1.10 The LDO process is subject to a notification procedure where key stakeholders are advised of applications. This ensures that “mitigation” is built into the LDO process given the strong emphasis on collaboration / engagement and monitoring. Based on the number of existing units within the Project site, it is unlikely that more than 180 residential conversions could be physically delivered. In practice, it is highly unlikely that applications for this many conversions would come forward under the LDO. A worst-case scenario of 180 residential units receiving Commencement Notice Approval has therefore been assumed for the purposes of this assessment. Should a figure of 100 Commencement Notice Approvals for residential units be reached within the 3 year period lifetime, then a moratorium will be placed on the LDO and it will be reviewed with the outcomes reported to full Council. Such a review will be informed by the input of the notification stakeholders (including NRW and DCWW).

4 LOCATION OF THE PROPOSED SCHEME

4.1 INTRODUCTION

4.1.1 Llanelli is the largest town in the county of Carmarthenshire, with a population of approximately 50,000. To the north and west of the town, the land use is predominantly agricultural. The Loughor River and estuary are directly to the south and east, which separates the town from Swansea, situated approximately 16km away.

4.2 TOPOGRAPHY

4.2.1 The LDO area is relatively flat with a gentle slope in topography towards the south west. A review of LiDAR mapping indicates a localised rise in topography within the south west corner of the LDO area. The site ranges from approximately 10m AOD to 8.5m AOD.

4.3 HISTORIC LAND USE

4.3.1 Llanelli has existed since the 1600s. The town grew significantly in the 1800s due to local coal and copper mining. The Site is part of the established Town Centre.

4.4 AIR QUALITY

4.4.1 The air quality in Llanelli and throughout Carmarthenshire is generally good. It is however noted that an Air Quality Management Area (AQMA) has recently (2016) been designated within and around the town. In this respect, an Action Plan will be formulated. However increased development within the Town Centre and the increased footfall may bring more car and bus movements to the area and therefore may have a potential impact on the current levels of pollutant concentrations if congestion becomes an issue. This however will be an issue for potential consideration through the Action Plan.

4.5 TRANSPORT AND ACCESS

4.5.1 The LDO area covers an area of the town centre within Llanelli. The town centre is accessible via a range of transport modes, including vehicular and pedestrian access with a number of key transport routes serving and accessing the town centre and LDO area. It is considered that any impacts that may arise are likely to be minor.

4.6 NOISE

4.6.1 The main source of noise in the area comprises primarily of road traffic noise. This comprises road traffic noise from the A484 and B4304. The A476 is designated as a Noise Action Planning Priority Area (NAPPA) and would be a source of continuous road traffic noise. The A476 was designated due to the level of existing noise from traffic passing through the area.

4.6.2 If there is an increase in footfall and vehicles in the area in and around the LDO, there may be a minor impact. It is considered that all impacts are expected to be minor and/or temporary. No significant impacts are likely to take place.

4.7 BIODIVERSITY

4.7.1 European Designated Sites (also known as Natura 2000 Sites) include any Special Protection Area (SPA), Special Area of Conservation (SAC), Sites of Community Importance (SCI's) and RAMSAR sites located within 2km of the Scheme or within 30km of the Scheme where bats are one of the qualifying interests of the designated site (measured from closest point).

4.7.2 There is one Special Area of Conservation (SAC) within 2km of the scheme, set out in Table 4-1.

Table 4-1 SAC within 2km

SITE	DESIGNATION	DISTANCE AND DIRECTION
Carmarthen Bay and Estuaries SAC	Carmarthen Bay and Estuaries provide an example of large estuarine site on the south coast of Wales, including the estuaries of the Rivers Loughor, Taf and Tywi, the estuaries form a single functional unit around the Burry Inlet, with important changes of sediment and biota. The area comprises several Annex 1 habitats which are a primary reason for the sites designation, these include; sandbanks which are slightly covered by sea water at all times; Estuaries; Mudflats and sandflats not covered by seawater; large shallow inlets and bays; Atlantic salt meadows. Annex II species Twaite shad are also present and are a primary reason for the sites designation.	1.35km south west

SPECIAL PROTECTION AREA

4.7.3 There is one Special Protection Area (SPA) within 2km of the scheme, set out in Table 4-2

Table 4-2 SPA within 2km

SITE	DESIGNATION	DISTANCE AND DIRECTION
Carmarthen Bay and Burry Inlet SPA	Carmarthen Bay SPA was the first fully marine SPA in the UK. It is a single feature site, designated in June 2003 for the common scoter seaduck, <i>Melanitta nigra</i> .	1.35km south west

RAMSAR

4.7.4 There is one Ramsar within 2km of the Scheme, set out in Table 4-3.

Table 4-3 Ramsar within 2km

SITE	DESIGNATION	DISTANCE AND DIRECTION
Burry Inlet Ramsar	<u>Ramsar Criterion 5</u> Assemblages of international importance Species with peak counts in winter: → 41655 waterfowl (5 year peak mean 1998/99 – 2002/2003).	1.35km south west
	<u>Ramsar Criterion 6</u> Species populations occurring at levels of international importance; Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: <ul style="list-style-type: none"> • Common redshank, (<i>Tringa totanus</i>); • Northern pintail, (<i>Anas acuta</i>) • Eurasian oystercatcher, (<i>Haematopus ostralegus</i>); • Red knot, (<i>Calidris canutus islandica</i>); • Species/populations identified subsequent to designation for possible future consideration under criterion 6: • Species with peak counts in winter: • Northern shoveler, (<i>Anas clypeata</i>). 	

4.7.5 There are no other SPAs, SACs, SCIs or RAMSAR sites located within 2km of the Scheme, or 30km of the Scheme where bats are the qualifying feature.

SITES OF SPECIAL SCIENTIFIC INTEREST (SSSI)

4.7.6 There is one Site of Special Scientific Interest (SSSI) within 2km of the Scheme, set out in Table 4-4.

Table 4-4 SSSI within 2km

SITE	DESIGNATION	DISTANCE AND DIRECTION
Burry Inlet and Loughor Estuaries SSSI	The largest estuarine complex within the old West Glamorgan county and Borough of Llanelli. Comprising extensive areas of grazed saltmarsh, sand and mud flats, the area is internationally significant for its wader and wildfowl populations with overwintering totals averaging in excess of 46,000 birds.	1.35km south west

NON STATUTORY DESIGNATIONS

- 4.7.7 There is one Local Nature Reserve (LNR) comprising North Dock Dunes located approximately 1.3km south west.
- 4.7.8 There are no other Local Nature Reserve (LNR's), Sites of Biological Importance (SBI's) or Sites of Importance for Nature Conservation (SINC's) or other non-statutory designations located within 2km of the Scheme.

4.8 TOWNSCAPE AND VIEWS

- 4.8.1 There are no Areas of Outstanding Natural Beauty (AONB) within proximity of the LDO boundary. The Gower AONB is located approximately 2.3km south west of the LDO. There are also no National Parks within 2km of the boundary.
- 4.8.2 The LDO boundary has been located within an area of Llanelli Town Centre. The town centre is a typical example of a former industrial urban area in social, economic and environmental terms. Llanelli has an established retail and commercial core which has experienced challenging economic conditions.

4.9 HISTORIC ENVIRONMENT

- 4.9.1 There are no registered battlefields or registered parks and gardens within 500m of the site area of the Llanelli LDO. The LDO covers the area of the town centre and is currently made up of mixed use comprising of predominantly retail and restaurant chains, small independent businesses, banks, libraries and dense residential housing which is built surrounding the town centre.
- 4.9.2 There are 14 Listed Buildings within the LDO boundary, as set out in Table 4-5, below. There are also a number of other Listed Buildings within the remaining areas of the Town Centre (not within the LDO boundary) and within 500m of the boundary. These currently comprises a mixture of residential, commercial buildings, churches and public houses.

Table 4-5 Listed buildings within the LDO boundary

LISTED BUILDING	GRADE
The Arcade, Stepney Street	II
The Post Office, Station Road	II
No. 1 (The Midland Bank), Station Road	II
No. 24 Cowell Street	II
No. 26 Cowell Street	II
No. 21 (Lloyd's Bank) Stepney Street	II
The Public Library, Church Street	II
No. 20 Vaughn Street, Bridge Street	I
No. 22 Vaughn Street, Bridge Street	I
No. 24 Vaughn Street, Bridge Street	I
No. 2 (Llanelly House) Vaughn Street	I
No. 4 (Llanelly House) Vaughn Street	I
No. 8 Bridge Street	II
No. 6 Bridge Street	II

4.9.3 The Old Castle motte is a Scheduled Monument which is located approximately 430m east of the LDO boundary. The monument comprises a medieval motte and bailey castle. The mound is circular and measures roughly 30m in diameter; it is partially submerged within the reservoir of the former Old Castle Tinplate works. The motte has been identified as likely site of the historic Castle of Carnwyllion. The monument is of national importance due to the potential to enhance knowledge of medieval defensive organisation. The monument forms an important element within the wider medieval context and the structure itself may be expected to contain archaeological information in regard to chronology, building techniques and functional detail.

4.9.4 Part of the area within the LDO boundary falls within part of the Llanelli Conservation Area.

4.10 GROUND CONDITIONS AND CONTAMINATION

4.10.1 There are no registered contaminated land or historic landfill sites within Llanelli Town Centre. However, land contamination may be present as a result of current and previous uses.

4.11 FLOOD RISK, HYDROLOGY AND WATER RESOURCES

4.11.1 As part of the LDO process, a Strategic Flood Consequence Assessment (SFCA) has been produced. The aim of this assessment is to seek to clarify and address flood risk to enable the approval of the LDO and provide details as to which buildings can be developed and which can't.

4.11.2 The area of the town centre within the LDO boundary has been identified to be at greatest risk of fluvial flooding from the River Lliedi and from surface water runoff. The LDO area is indicated to be largely located within Flood Zone 3 and Flood Zone 2, as identified on Natural Resources Wales flood maps. This means that the area has a chance of flooding of greater than 1 in 100 (1%) each year, and 0.1% (1 in 1000).

4.11.3 Hydraulic modelling of the River Lliedi undertaken in 2009 indicates that flooding at the site is initially through the surcharging of manholes located on Mincing Lane, adjacent to Market Street, and predicted to occur during events with an annual probability of between 1 in 25 and 1 in 75.

4.11.4 Flooding during the 1 in 100 annual probability event is predicted to increase, with flooding on Vaughan Street and along length of Stepney Road including areas to the north and south within the site. Typical flood depths are predicted to be 0.2m. Flow velocities are predicted to be generally low (>0.1m/s) with slightly higher velocities (up to 0.4m/s) predicted along Stepney Street.

4.11.5 Approximately 80% of the LDO area is predicted to be at fluvial flood risk during the 1 in 1000 annual probability event. Flood depths of up to 1m are predicted in the vicinity of Mincing Lane and 0.6 – 0.7m along Stepney Street and Vaughan Street. Depths greater than 2m are predicted at isolated locations to the south-west of the LDO area on Cowell Street, although these are considered likely to be associated with basement structures. Flow velocities along Stepney Road

4.12 SUMMARY OF KEY SENSITIVE RECEPTORS

4.12.1 Section 4 above confirms that there are no sensitive areas, as set out by regulation 2(1) of the 2017 EIA Regulations, within the site boundary or in immediate proximity of the Proposed Development. However, the following key sensitive receptors are potentially subject to environmental effects:

- SAC / SPA / Ramsar within 2km of the LDO boundary;
- Existing residential properties within the Site boundary;
- Local Community that are using the Town Centre;

- Construction workers;
- Local townscape character;
- Designated Heritage Assets;
- Llanelli Conservation Area;
- Unknown archaeological assets;
- Waste facilities; and
- Foul and potable water network.

5

CHARACTERISTICS OF LIKELY EFFECTS

5.1.1

Table 5-1 provides an evaluation of the potential effects of the Proposed Scheme on the environment using the evidence base provided above. Where necessary additional assumptions which have informed the evaluation are also presented.

Table 5-1 Appraisal of likely environmental effect

RECEPTOR CATEGORY	RECEPTORS	EFFECT	DISCUSSION OF EFFECT
Biodiversity	SAC / SPA / Ramsar within 2km	Indirect effect of increased sewerage as a result of the change of use to residential.	<p>This effect is discussed in greater detail in the HRA Screening report referred to above.</p> <p>The LDO includes measures to prevent additional discharges to the public sewer causing an effect to the SAC/SPA/Ramsar, by requiring approval by Dwr Cymru Welsh Water before permission is granted. Assuming that the approval process prevents a change in water quality within the SAC/SPA/Ramsar, signification effects are considered unlikely.</p>
Population and Human Health	Existing residents Local Community	Disturbance associated with noise, vibration, dust, particulate matter and light pollution, generated by temporary on-site activities and demolition / construction traffic.	<p>Conversion and associated activities may involve a variety of temporary equipment. As such there is some potential for disturbance associated with noise and vibration, an increase in dust and particulate matter, as well as the potential for light spill and glare experienced by residential receptors. Resulting effects would be temporary in nature and reversible.</p> <p>Where appropriate, it is assumed that a CEMP or other pollution prevention measure would be in place for each conversion that would include standard / best practice measures in order to abate or limited environmental effects associated with each phase. As such, significant effects are considered unlikely.</p>
Population and Human Health	Existing residents Local Community	Increase in pollutant concentrations (NO _x , NO ₂ and PM ₁₀) from exhaust emissions arising from demolition / construction traffic	<p>During Conversion and associated activities, NO₂ and PM₁₀ emissions may occur from construction traffic within the LDO.</p> <p>As the changes to the buildings are relatively minor, there will be minimal need for waste removal and material delivery. The number of units to be converted at any one time will also be minimal. As such, significant effects are considered unlikely.</p>
Population and Human Health	Existing residents Local community	Changes in pollutant concentrations (NO _x , NO ₂ and PM ₁₀) from exhaust emissions arising from traffic generated by the Proposed Scheme	<p>There is the potential for increased traffic during the operation of the new residential properties.</p> <p>The LDO states that new residents will not be entitled to parking permits and therefore, the increase in domestic traffic will be minimal. As such, significant effects are considered unlikely.</p>
Population and Human Health	Construction workers	Construction workers affected by flood event	<p>The LDO area is within indicated to be largely located within NRW Flood Zones 2 and 3.</p> <p>During the demolition and construction phases it is assumed that as a precautionary measure, the main contractor on site would be signed up to the NRW Flood Information Service. As such, significant effects are considered unlikely.</p>

RECEPTOR CATEGORY	RECEPTORS	EFFECT	DISCUSSION OF EFFECT
Population and Human Health	New Residents	Increase in number of properties at risk of flooding	<p>The LDO area is within indicated to be largely located within NRW Flood Zones 2 and 3.</p> <p>An SFCA has been developed to ensure that the only buildings that are suitable from a flood risk perspective will be developed. The LDO will not permit change of uses to highly vulnerable development on ground floor units. As such, significant effects are considered unlikely.</p>
Townscape Character	Local townscape character	Changes to existing townscape character and visual amenity	Minor temporary changes in local townscape character during construction due to the presence of plant/equipment. However, each development will be surrounded by built / urban form which contains views into / out of the Site.
Population and Human Health	Local community		The LDO will not permit a change to the ground floor of the properties to maintain the commercial appearance of the town centre.
Historic Environment	Setting of designated assets		In investing in the change of use, there may the opportunity to improve the townscape character through bringing more properties back into use. As such, significant effects are considered unlikely and there is potential for the LDO to benefit local townscape.
	Conservation Area		
Historic Environment	Designated heritage assets (including listed buildings and Conservation areas).	Physical changes to Heritage and archaeological assets	The LDO will not permit changes to listed buildings and there will be no excavation for new foundations.
	Buried archaeological assets.		Listed building are not likely to be affected and as there has been extensive previous development within the Site boundary, archaeological remains are likely to have disturbed / truncated previously (if present). As such, significant effects are considered unlikely.
Property / Infrastructure	Waste facilities	Generation of waste from demolition and/or construction activities and increased demand on local waste treatment / disposal facilities	Conversion and associated activities may result in a number of waste streams. It is assumed that a Waste Management Plan (WMP) or as part of a CEMP will be in place and managed by the main contractor so as to control resulting waste streams, their appropriate reuse (including reuse on-site if applicable) or recycling and ultimate disposal to relevant waste handling facilities. As such, significant effects are considered unlikely.
Property / Infrastructure	Waste facilities	Generation of waste from the operation of the Proposed Scheme and increased demand on local waste treatment / disposal facilities	The Proposed Scheme may result in the generation of waste and increased demand on the local waste treatment / disposal facilities. However, it is assumed that local municipal Waste collection services has the capacity to collect the minimal extra volume of waste. As such, significant effects are considered unlikely.

RECEPTOR CATEGORY	RECEPTORS	EFFECT	DISCUSSION OF EFFECT
Property / Infrastructure	Foul and potable water network	Increase in foul flows, associated capacity of sewers and potable water demand as a result of the Proposed Development	The Proposed Scheme may result in an increased population and thus a greater demand on the local sewer network (i.e. foul flows) and potable water demand. The LDO includes measures to prevent additional discharges to the public sewer by requiring approval by Dwr Cymru Welsh Water before the certificate of conformity is issued. As such the scheme is not considered to result in likely significant effects. Reference is made to the Infrastructure Report accompanying the LDO.

5.2 LIKELY CUMULATIVE EFFECTS

5.2.1 From a review of CCC planning portal, the projects set out in Table 5-2 have been identified as having potential for in combination effects.

Table 5-2 Relevant committed development

REFERENCE	DESCRIPTION	ADDRESS	DATE VALID	DECISION
S/32778	Change of use from offices to two self-contained flats	15 JOHN STREET	02/10/2015	Granted 05/07/2016
S/32779	Change of use from offices to two self-contained flats	11 JOHN STREET	02/10/2015	Granted 05/07/2016
S/31010	Proposed alteration from existing first and second floor offices to 5 self-contained flats and 3 studio apartments	13-15 COWELL STREET	13/10/2014	Granted 10/11/2014
S/33199	Retain existing retail facility on ground floor, demolish rear extensions and create new access to new first and second floor apartments	10 - 12 STEPNEY STREET	14/01/2016	Granted 24/02/2016
S/32566	Proposed change of use from offices to flats	16 PARK STREET	27/06/2016	Granted 18/01/2016

5.2.2 An evaluation of potential common receptors has been undertaken and no common receptors have been identified for the following effects:

- **Loss or disturbance of potential buried archaeological assets.** Archaeological assets potentially affected by the Proposed Scheme is limited to the Site and do not share a common extent with the committed development.
- **Flood event during construction.** This effect is limited to construction workers and there is no predicted overlap with construction staff of the other committed developments.
- **Increase in number of properties at risk of flooding.** This is a property specific effect
- **Changes to existing townscape character and visual amenity.** The Proposed Development is not considered to result in a detrimental effect upon the townscape character,

5.2.3 The evidence outlined above is considered satisfactory to conclude that these effects require no further in-combination assessment.

5.2.4 Evaluation of potential common receptors has concluded that there are common receptors for the following effects:

- **Indirect effect on SAC/SPA/Ramsar of increased volumes of sewerage as a result of the change of use to residential.** The necessary control measures are in place to prevent a deterioration to water quality that may impact on the integrity of the SAC/SPA/Ramsar and therefore no further assessment is required;
- **Disturbance associated with noise, vibration, dust, particulate matter and light pollution, generated by temporary on-site activities and demolition / construction traffic.** There is the potential for works to commence concurrently across the Proposed Development and other development. It is assumed that the schemes would implement similar mitigation measures to limit temporary effects and disturbance to nearby residential receptors. Although a potential in-combination effect is identified, this is unlikely to be over and above the effects at the project level and this not considered further in the assessment;
- **Increase in pollutant concentrations (NO_x, NO₂ and PM₁₀) from exhaust emissions arising from demolition / construction traffic and Changes in pollutant concentrations (NO_x, NO₂ and PM₁₀) from exhaust emissions arising from traffic generated by the Proposed Development.** The road network will be tolerable to level of additional traffic and each scheme in isolated may not give rise to significant effects, yet in-combination the resulting traffic has the potential to result in a likely significant effect. It is assumed that CCC would include similar conditions and requirements as those identified within planning permission decision notices for the committed developments, in order to minimise the likely increase in traffic flow through Llanelli Town Centre. Such assumed mitigation across the LDO and committed developments is unlikely to give rise to significant environmental effects.
- **Changes to existing townscape character and visual amenity.** Investment across the town centre is likely to improve the townscape and visual amenity of Llanelli. Construction impacts will be relatively minor and separated between different streets where work is being completed;
- **Generation of waste from demolition and/or construction activities and increased demand on local waste treatment / disposal facilities.** Given the common geographical extent of the Proposed Scheme and committed developments it is likely that waste arising will be sent to similar waste treatment / disposal facilities. Although, there is the potential for an in-combination effect it is assumed that all schemes will implemented a WMP to minimise waste arisings and thus increased pressure on shared local waste treatment / disposal facilities. As such, the potential in-combination effects would be no greater than that considered at the project level;
- **Generation of waste from the operation of the Proposed Scheme and increased demand on local waste treatment / disposal facilities.** Given the common geographical extent of the Proposed Scheme and committed developments it is likely that waste arising will be sent to similar waste treatment / disposal facilities. Although there is the potential for an in-combination effect, it is assumed that local municipal Waste collection services have the capacity to collect the extra volume of waste. As such, the potential in-combination effects would be no greater than that considered at the project level; and
- **Increase in foul flows, associated capacity of sewers and potable water demand as a result of the Proposed Development.** Given the common geographical extent of the Proposed Scheme and committed developments it is likely that there is a common foul flow, sewage and potable water network. Nevertheless, all schemes would be required to undertake appropriate engagement with CCC and Dwr Cymru Welsh Water in order to determine capacities across each network and determine necessary contributions to upgrades. As such, the in-combination effect is considered no greater than that at the project level.

6 SUMMARY

- 6.1.1 WSP has prepared this EIA Screening Report under the 2017 EIA Regulations to support a request to Carmarthenshire County Council (CCC) planning department for an EIA screening opinion. The report provides the information necessary for CCC to provide a screening opinion in accordance with Schedule 2 and 3 of the 2017 EIA Regulations 2017.
- 6.1.2 The information provided in Section 5 of this report provides an assessment of likely environmental effects, including those that may arise as a result of combined impacts on receptors and through the combination of other developments.
- 6.1.3 The Site is not located within a sensitive area although there are sensitive receptors with the LDO boundary and SPA/SAC/Ramsar within 2km.
- 6.1.4 The LDO permits change in use; it does not permit change in building structure, size or external appearance. The Infrastructure Study proposes measures to be put in place to reduce the potential effect of increased foul water flow to the sewerage network, notably through a proposed Drainage Strategy.
- 6.1.5 To minimise the impact of implementing the LDO on local receptors, it is proposed that each developer be required to implement a Construction Environmental Management Plan (CEMP) where appropriate and necessary.

Appendix A

SITE LOCATION PLAN