



DESIGN & ACCESS STATEMENT
INCORPORATING A
HERITAGE IMPACT ASSESSMENT

**Refurbishment and Extension to Convert Nightclub
Into Elderly Person Retirement Apartments
At The Waterside, The Quay,
Carmarthen SA31 3JP**

For: W. James Group

Our Ref.: 1515b/RAB

Date: March 2025

1.0 Introduction

- 1.1 This Design & Access Statement incorporating a Heritage Impact Assessment has been compiled to accompany the submission of an Application for Full Planning Permission to Carmarthenshire County Council. The submission seeks the approval for proposed development by W. James Group for the *“Refurbishment and Extension of Nightclub to Convert to Elderly Persons Retirement Apartments”* at The Waterside, The Quay, Carmarthen.
- 1.2 The Application follows proposals lodged under a Pre-Application Enquiry before the Council in October 2023 and registered as PRE/01851. A formal response was received dated 19th July 2024 which indicated that the Local Planning Authority needed to be assured that the proposed redevelopment would not present any potential for adverse effects upon the character and setting of “The Quay / Towyside Conservation Area”, together with adjacent and nearby Listed Buildings.
- 1.3 Officers requested that a number of potential draft designs be brought forward with a particular emphasis on new roof design. A pitched, saddle-shaped roof design is favoured by the Council, which was not one originally presented in the formal Enquiry. The original roof design was one of a flat roof with mansard detailing, which was seeking to mimic the roof design of the adjoining Towy Works Listed Building, albeit set at a lower overall building height and recessed building line onto the Coracle Way elevation.
- 1.4 However, Council Officers favoured one of the various alternative plans presented under that Pre-Application Enquiry, namely Option 2, and that alternative design is presented for consideration in this application for planning permission.
- 1.5 This Design and Access Statement, incorporating a Heritage Impact Assessment, accordingly, presents a character appraisal of *“The Quay / Towyside Conservation Area”*, together with specific Grade II Listed Buildings located at The Quay and Coracle Way respectively. The effects upon the character and setting of that Conservation Area and identified Listed Buildings is addressed, and particularly how the revised proposals will be seen to “preserve and enhance” the character of that Conservation Area.

2.0 Site Description

- 2.1 The Application site consists of a double fronted building set between The Quay and Coracle Way and principally overlooking the northern bank of the River Towy on the fringe of Carmarthen Town Centre. The commercial building offers a two-storey façade to The Quay noted for multiple commercial loading doors to that riverside elevation, with raised window openings at ground floor, and with an elongated first floor exhibiting a variety of vertically proportioned window openings. Part of the façade is crowned with a decorate parapet, set afront of a pitched roof.
- 2.2 The Coracle Way elevation is noticeably different in appearance and form, dominated by the main pitched roof, which is covered in profiled cement roof sheets, with a continuous row of rooflights to one side of the roof plane. A series of single-storey flat roof projections emerge off the elevation, which are noted for being constructed below adjacent carriageway level, largely hidden from public view by a short brick boundary wall and modern railings above. That brick finish has also been used to form a flat roofed reception projection to one side, but the façade of which to Coracle Way lacks openings and any distinct architectural merit.
- 2.3 The Waterside is long established as a nightclub, offering late night entertainment, with The Quay elevation exhibiting a projecting box fascia sign over one ground floor opening, illuminating the presence of “Players Sports Bar”.
- 2.4 It appears from a check of the relevant planning history for the site that the nightclub stems from its inception in 1975, having previously being a commercial stores unit.
- 2.5 The property adjoins “Towy Works”, a Grade II Listed Building, set over changing ground levels, but accommodating over three floors of commercial space given over a hardware and building materials wholesalers and general retailing establishment. Towy Works also benefits from a large and completely open storage yard located off the western flank of The Waterside property, with two sets of wide commercial metal gates intermittently positioned off The Quay carriageway. That yard exhibits a frontage length of 42 metres, and thus equivalent to the frontage width of The Waterside at 39 metres.
- 2.6 The western side of The Quay has experienced considered development changes over the last 7-8 years, intermingled with three established multi-use properties. Towy Works continue to retain a two-storey warehouse building of the side flank of its open yard, whilst adjoining to its immediate east lies a further open yard, used as surfaced off-street parking. A substantial four storey modern office building adjoins and has been completed in place of a former public house, known then as “The Jolly Tar”. Another three-storey, modern office building has been created to the west, separated from the afore-mentioned modern construction by a converted church, which has for many years been established as an Accountants’ Office.

The final building fronting The Quay is a two-storey restaurant at its western extremity. It presents an under-croft and lower floor to The Quay but is largely single storey in appearance as it wraps about the roundabout junction with Coracle Way.

- 2.7 Figure 1 below provides an extract from the Ordnance Survey Explorer map with the Application site identified by a red arrow. The neighbouring buildings and open yard use along The Quay are evident at Figure 2 being an extract from Google Earth. It also identifies Coracle Way, which is the main distributor road about the edge of the town centre and riverside. Coracle Way is part of the A4242, which extends at its western edge off a roundabout interchange with The Quay and Blue Street. It is a dual carriageway for eastbound traffic, but only single carriageway for westbound traffic from its traffic light-controlled junction to the eastern side with Jail Hill, Old Station Road, and Towy Bridge.
- 2.8 By contrast, due to its width, The Quay is a one-way street, allowing only westbound movement, but is equipped with a narrow footway to the northern flank. The southern flank is characterised by the historic quayside embankment and iron mooring posts, linked by decorative metal chains. The mooring posts are designated Grade II Listed Structures in their own right, reflecting one of the last remaining historic remnants of Carmarthen's river-faring past.

Figure 3 is an extract from a more detailed OS plan, with the application site edged in red for ease of identification.

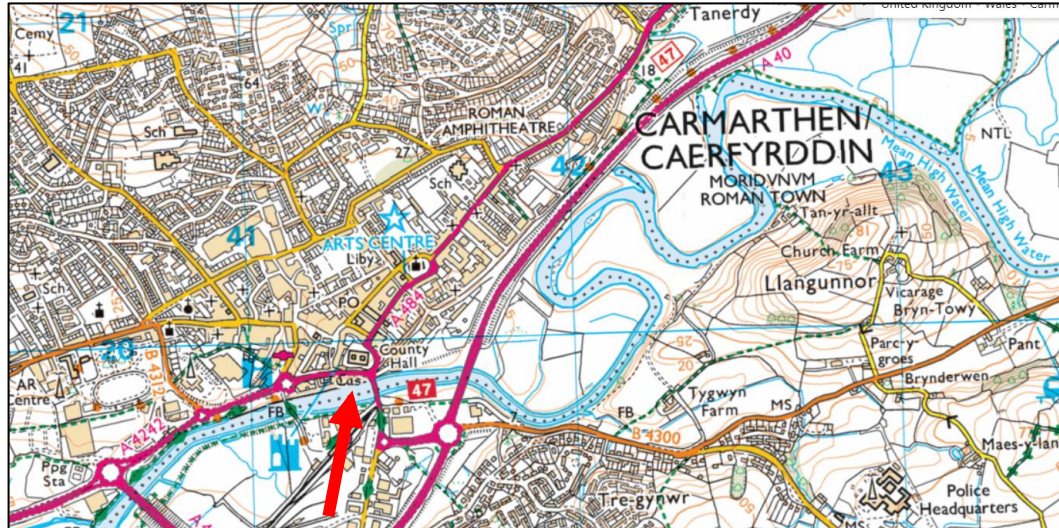


Figure 1 – location of the Application site at The Quay

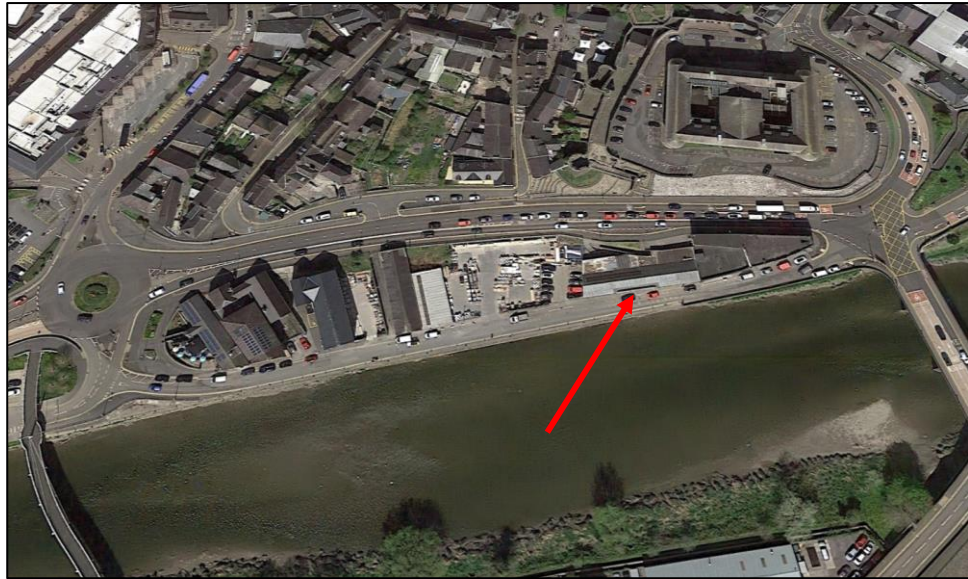


Figure 2 – Google Earth image of the application site locality – April 2021

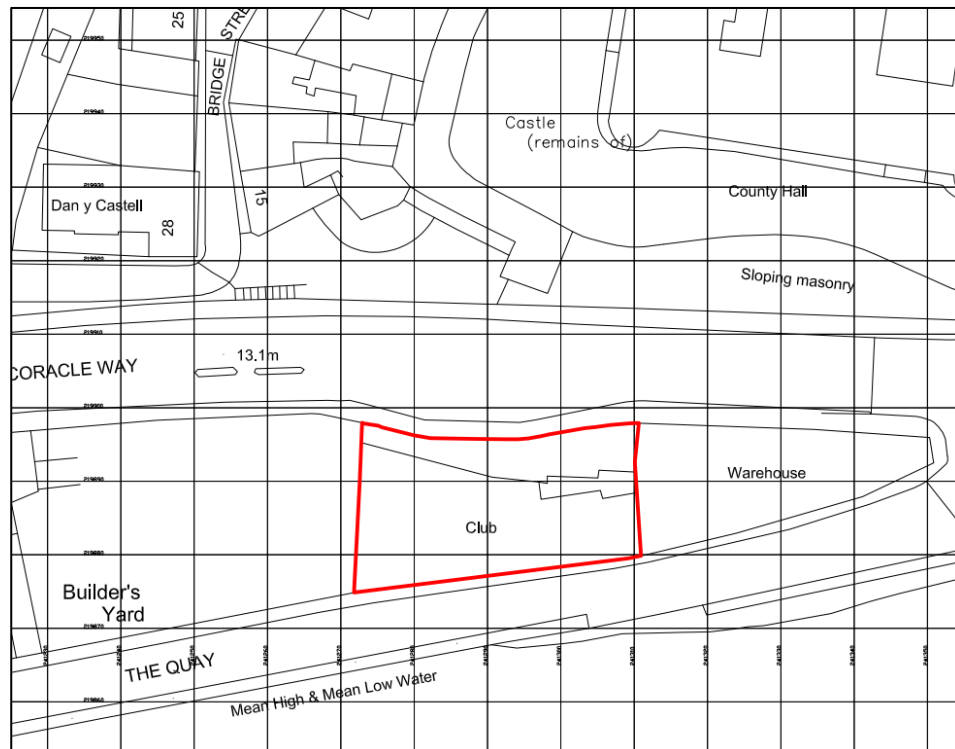


Figure 3 – Location plan of The Waterside at The Quay

3.0 **Existing Development**

- 3.1 The Application proposals seek to completely re-develop The Waterside site, refurbishing and extending the upper floors of the building, leaving only the lower ground floor in current form to The Quay. The Coracle Way elevation will be completely transformed with disjointed array of flat-roofed projections all removed and a complementary façade presented to match that proposed to The Quayside. The existing industrial-type roof will be replaced with a complementary saddle pitched roof, but respectful of the adjoining massing of Towy Works.
- 3.2 However, it is crucial in this case **to understanding the redevelopment in the context of seeking to reform the existing building, and its established appearance, form and scale.** Figures 4, 5 and 6 illustrate the current elevations of the application building and highlight its rather disjointed and unremarkable appearance and form, when viewed from both The Quay and Coracle Way. The side elevation graphically illustrates the extent of flat-roofed additions to the Coracle Way side of the building, and the tall massing of Towy Works adjoining off the eastern side of the building.



Figure 4 – southern existing elevation to The Quay

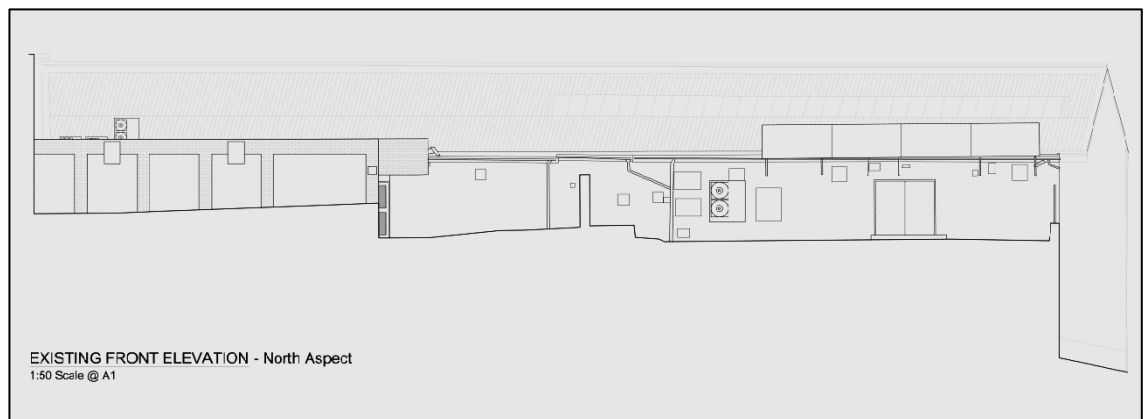


Figure 5 – existing elevation to Coracle Way and array of projecting flat-roofed additions

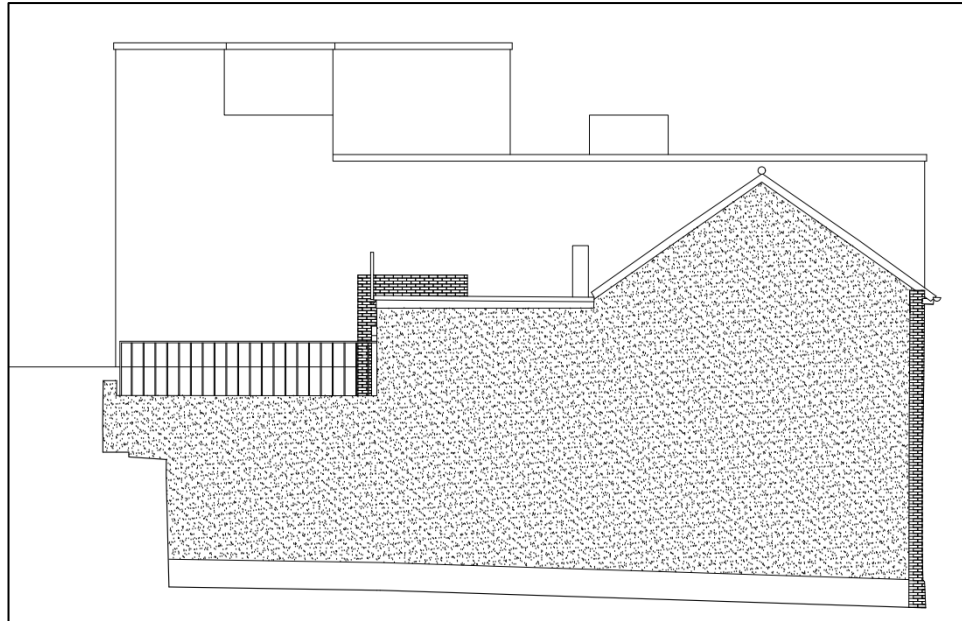


Figure 6 – side elevation to Towy Works open yard, but with neighbouring building shown in background for context of massing and scale

- 3.3 The building floor levels have been catalogued in floor plans, and which are reproduced below at Figures 7 and 8 below and overleaf, being the lower ground floor to The Quay elevation and upper ground floor to Coracle Way. The lower ground floor accommodates a large central open floor dance area. An integral bar servery, toilet areas and storage areas are also highlighted, and that the actual floor level is elevated about the adjoining street level, witnessed by an internal ramp and short stairwells to the external door openings.

The upper ground floor opening out to Coracle Way accommodates similar nightclub arrangements, with a principal entrance doorway in the brick-built eastern projection, with ramped access descending from pavement level.

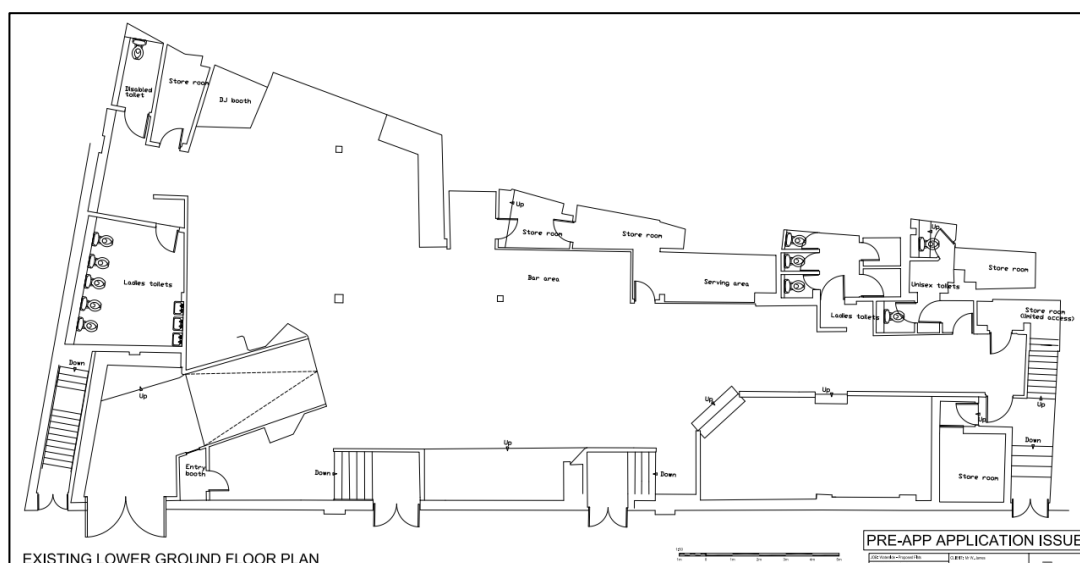


Figure 7 – lower ground floor with openings to The Quay

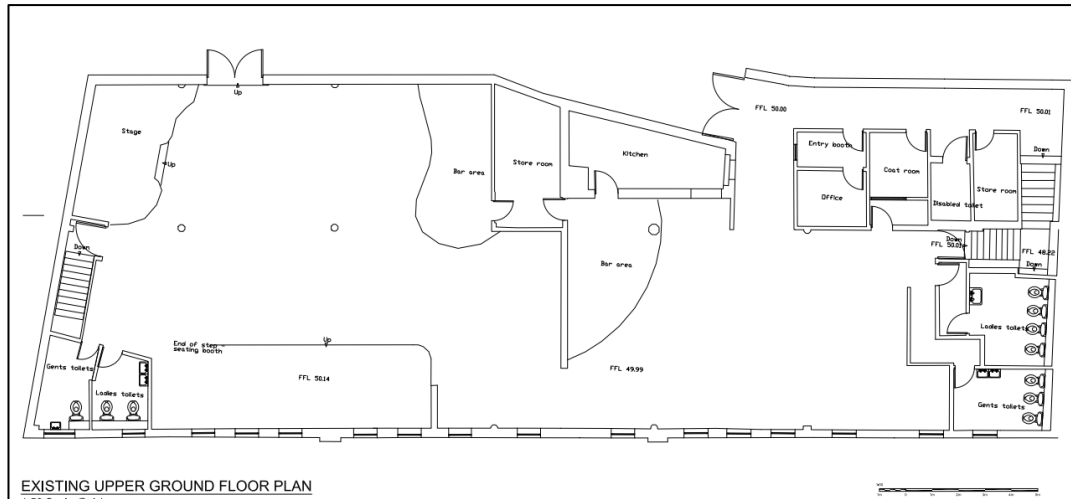


Figure 8 – upper ground floor to Coracle Way

- 3.4 The existing facades of the building are graphically depicted in the following photographs and illustrate the contrast in elevations, unlike the adjoining Towy Works building which exhibits a sense of complete uniformity and dual frontage to both opposing streetscenes. The openness created by the Towy Works storage yard off the western elevation has the unfortunate effect of exposing views of that side of the building, especially from The Quay and Coracle Way public carriageways.



Photo 1 – view of elevation from The Quay



Photo 2 – view from western side of The Quay elevation



Photo 3 – side elevation to adjoining open yard and range of flat roofed projections to Coracle Way



Photo 4 – view from Coracle Way and proximity of Towy Works, with unremarkable appearance of existing nightclub building

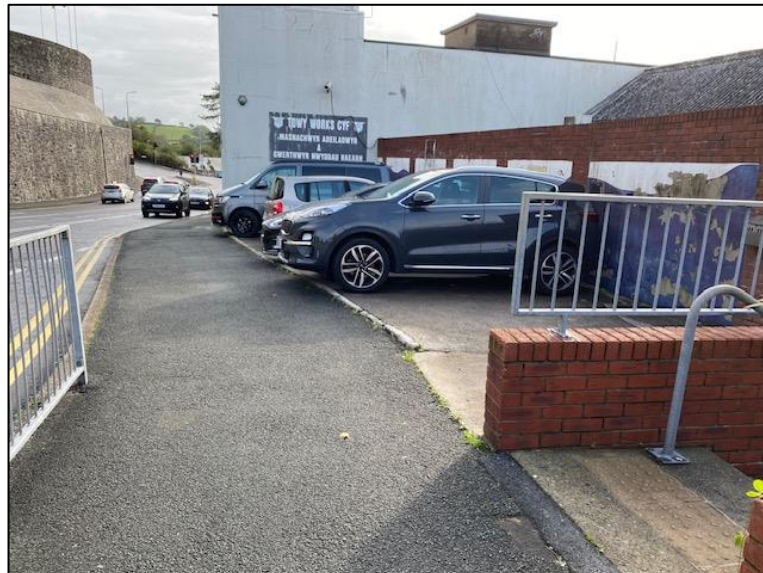


Photo 5 – front apron off northern façade to Coracle Way being used for car parking against reception projection, with Towy Works in background

4.0 PRIMARY LEGISLATION **& NATIONAL AND LOCAL PLANNING POLICY CONTEXT**

4.1 Primary Legislation

- 4.1.1 The Waterside lies within a designated Conservation Area, being “*The Quay / Towyside*” Conservation Area, which was formally designated in 1995.

Section 72 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on local planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of a Conservation Area. A character appraisal of *The Quay / Towyside Conservation Area* is provided in the next Section of this Assessment.

- 4.1.2 The application property lies immediately adjoining a Grade II Listed Building, namely Towy Works, and near to other prominent Listed Buildings and Structures, such as County Hall, The Quayside mooring posts and Towy Bridge.

Section 66 of the Act indicates that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The effect of the redevelopment proposals upon those designated historic assets is addressed in the next Section of this Statement.

4.2 National Planning Policy

- 4.2.1 Paragraph 6.1.6 of “Planning Policy Wales” (Edition 12) (February 2024) (PPW) sets out the Government’s specific objectives to preserve or enhance the character of conservation areas. Paragraph 6.1.14 of PPW states “*there should be a general presumption in favour of the preservation or enhancement of a conservation area or their settings. Positive management of conservation areas is necessary if their character or appearance are to be preserved or enhanced.*”

- 4.2.2 Paragraph 6.1.16 of PPW states “*Preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area’s character or appearance or leaves them unharmed. Mitigation measures can also be considered which could result in an overall neutral or positive impact of a proposed development in a conservation area.*”

- 4.2.3 Technical Advice Note 24 “The Historic Environment” (May 2017), indicates at paragraph 6.7 that “*Many conservation areas include sites or buildings that make no positive contribution to, or indeed detract from the character or appearance of the area; their replacement should be a stimulus to imaginative, high-quality design and an opportunity to enhance the area.*”

4.3 Local Planning Policy

4.3.1 The development plan in form for the purposes of Section 38(6) of the Planning & Compensation Act 2004 is the Carmarthenshire Local Development Plan, which was adopted in December 2014. The application site at The Quay is shown upon the LDP Proposals Map as lying within the defined settlement limits of Carmarthen but is not specifically allocated for any specific existing or proposed use.

4.3.2 Policy SP13 of the Local Development Plan states *“proposals should preserve or enhance the built and historic environment of the County, it’s cultural, townscape and landscape assets and where appropriate, their setting.*

Proposals relating to the following will be considered in accordance with national guidance and legislation.

- *Sites and features of recognised Historical and Cultural Importance.*
- *Listed Buildings and their setting.*
- *Scheduled Ancient Monuments and other sites of recognised archaeological importance.*

Proposals will be expected to promote high quality design and that reinforces local character and respects and enhances the local setting and the cultural and historic qualities of the plan area.

4.3.3 Policy EQ1 Protection of Buildings, Landscapes and Features of Historic Importance indicates that *“Proposals for development affecting landscapes, townscapes buildings and sites or features of historic or archaeological interest which by virtue of their historic importance, character or significance within a group of features make an important contribution to the local character and the interests of the area will only be permitted where it preserves or enhances the built and historic environment.”*

4.3.4 Policy GP1 *“Sustainability and High-Quality Design”* has applicable and selected criteria in respect of the redevelopment of existing buildings at important historic locations within Carmarthen. It reads: *“Development proposals will be permitted where they accord with the following:*

- a. *It conforms with and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing, elevation treatment, and detailing;*
- c. *Utilises materials appropriate to the area within which it is located;*
- d. *It would not have a significant impact on the amenity of adjacent land uses, properties, residents or the community;*
- f. *It retains, and where appropriate incorporates important local features (including buildings, amenity areas, spaces, trees, woodlands and hedgerows) and ensures the use of good quality hard and soft landscaping and embraces opportunities to enhance biodiversity and ecological connectivity;*

- g. It achieves and creates attractive, safe places and public spaces, which ensures security through the 'designing-out-crime' principles of Secured by Design (including providing natural surveillance, visibility, well-lit environments and areas of public movement);*
- i. It protects and enhances the landscape, townscape, historic and cultural heritage of the County and there are no adverse effects on the setting or integrity of the historic environment;*

5.0 CHARACTER APPRAISAL OF THE QUAY / TOWYSIDE CONSERVATION AREA

- 5.1 The Quay / Towyside Conservation Area was formally designated in 1995, and covers the built enclave of buildings, open yards set south of Coracle Way and fronting The Quay. It also includes tracts of part grazed, rough meadow which act as the tidal outreaches of the River Towy between Towy Bridge and Pont Lesneven. Figure 9 provides an extract of the boundaries of the designated Conservation Area, where it can be seen to absorb into the boundary of the *Carmarthen Town Conservation Area* to the immediate north about County Hall, Blue Street and Bridge Street.

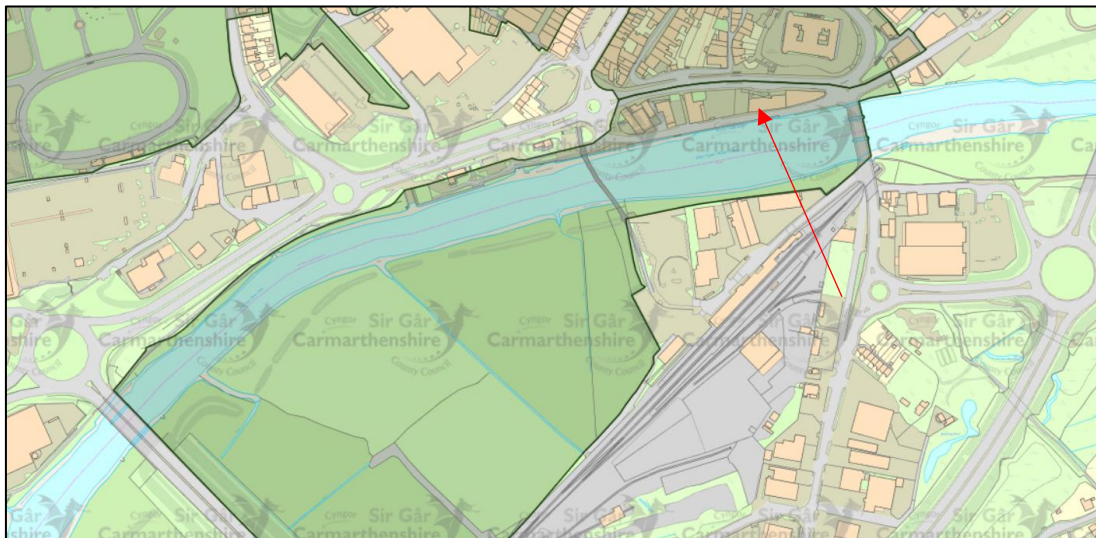


Figure 9 - The Quay / Towyside Conservation Area and site highlighted

- 5.2 Welsh Government provide guidance within Technical Advice Note 24: "The Historic Environment" (May 2017). Paragraph 6.3 indicates that *"Local planning authorities must from time to time formulate and publish proposals for the preservation and enhancement of conservation areas in a management plan. In accordance with best practice, this should be every five to ten years."*

It indicates that LPAs should consider **Conservation Area Appraisals**. Paragraph 6.4 indicates that *"A conservation area appraisal is the foundation for any proposals for preservation and enhancement."* It is noted that the Council have recently prepared Conservation Area Appraisals for the Priory Street and Carmarthen Town Conservation Areas. However, there is currently no such Appraisal for The Quay / Towyside Conservation Area, and thus there is no clear guidance as to special attributes or attention should be paid to specific parts or buildings within the designation.

- 5.3 This HIA will therefore present an assessment of the character of the Conservation Area. It is primarily noted for its commercial past in providing formal mooring for goods and people transported up the River Towy, evidenced by the historic

quayside wall and mooring posts. A small number of listed buildings are to be found in the designation as shown by the extract from CADW's Cof Cymru records at Figure 10. Most notable of those listed buildings is "Towy Works" (CADW 82210), being a *"Builders merchants' premises by George Morgan & Son built in 1907-9 for James Davies."*

The CADW listing describes the reason for listing as *"Included as a purpose-built early C20 hardware store of unusual scale, little altered."*

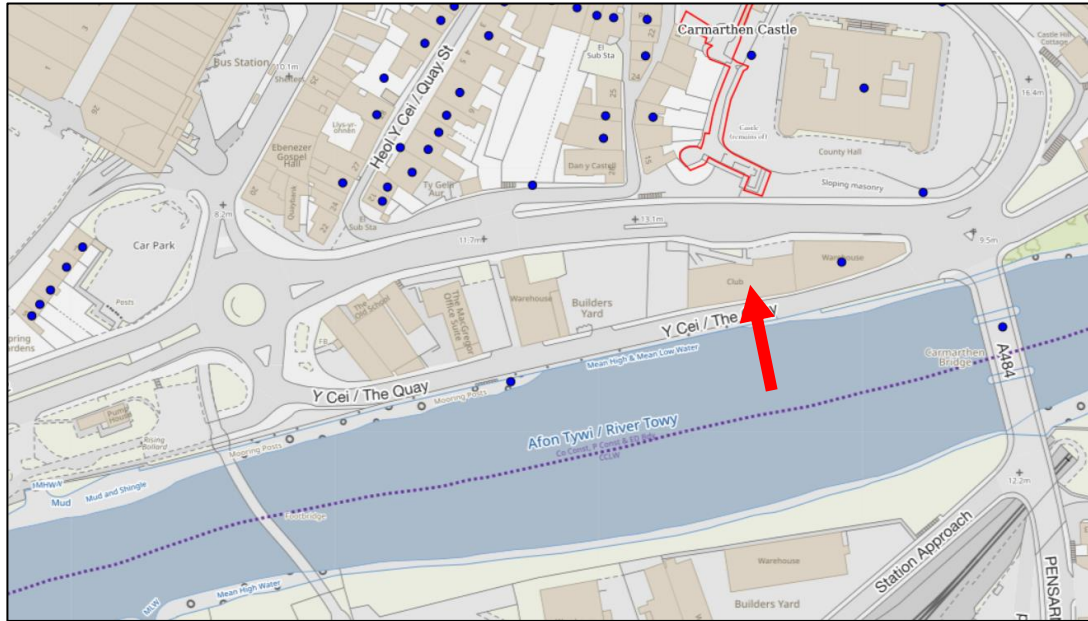


Figure 10 – Listed Buildings and Scheduled Ancient Monuments in vicinity of Application Site (Extracted from CADW's Cof Cymru records)

- 5.3 The Towy Bridge forms the eastern extremity of the Conservation Area (CADW 82209), noted as *"the present ferro-concrete bridge was designed by Sir Clough Williams-Ellis in 1933."* The Bridge affords a panoramic view over the wide channel of the River Towy, and extent of Conservation Area, including the whole of The Quay cluster of riverside buildings, as shown in Photos 6 and 7 below.



Photo 6 – view from Towy Bridge of riverside buildings at The Quay



Photo 7 – view of application building, alongside Towy Works, set against the backdrop of Carmarthen Castle and a mix of historic and modern buildings elevated above Coracle Way

- 5.4 The character and setting of The Quay / Towyside Conservation Area can be viewed from a newer public vantage point in recent years, following the completion of the King Morgan footbridge, linking Carmarthen Rail Station and lower Blue Street. From that new single span bridge, views of modern, replacement buildings off the western side of The Quay can be viewed alongside more established buildings such as The Waterside and Towy Works, as shown in Photos 8 and 9 below.



Photo 8 – The whole streetscene of The Quay part of the Conservation Area viewed from King Morgan Bridge



Photo 9 – the application building set in the Conservation Area, alongside Towy Works, with County Hall as their backdrop

- 5.5 The above photographs illustrate the significant change to the western part of the Conservation Area created by the demolition of former commercial buildings and replaced by multi-storeyed office developments. Photos 10 to 13 below illustrate the current and former settings, comparing the original structures with scale and

massing of new constructions from identical positions along the street scene off The Quay.



Photo 10 – two recent constructions at The Quay rising to three and four storeys at southern elevations (February 2025)



Photo 11 – previous view from same position in streetscene (April 2011) with The Jolly Tar public house and vehicle repair garage in place before demolition



Photo 12 – view from western end of The Quay at expanse of new constructions well in excess of the height of established restaurant (Feb 25)



Photo 13 – Former view illustrating a sense of two-storey uniformity at the western side of The Quay (April 2011)

- 5.6 The above contrasting images are graphic examples and precedents that the Local Planning Authority has **embraced the guidance** provided in TAN23 at paragraph 6.7 that “*Many conservation areas include sites or buildings that make no positive contribution to or indeed detract from the character or appearance of the area; their replacement should be a stimulus to imaginative, high-quality design and an opportunity to enhance the area.*”

The re-developments have resulted in a shift in balance of the character and setting in the compacted Conservation Area.

6.0 PROPOSED DEVELOPMENT & ASSESSMENT IN CONTEXT OF PRIMARY LEGISLATION AND NATIONAL & LOCAL PLANNING POLICY

- 6.1 The Application proposals seek to form a refurbished and extended construction comprising four storeys at the southern elevation, with the lower ground floor to The Quay replicated in the sense of retaining openings currently in evidence. Those lower ground openings are graphically illustrated at Figure 10 below and will include for those openings to have replacement finishing materials. At present, window openings to The Quay are fitted in white upvc as shown in Photos 14 and 15 below. New grey aluminium windows will be provided, and not just at lower ground level, but also continued to the new upper floors to replicate the type of uniform materials evident upon the modern office development located west at The Quay.



Figure 10 – proposed elevation to The Quay



Photo 14 – evidence of white upvc openings upon existing building



Photo 15 – evidence of window openings of different heights and cill levels

- 6.2 The above photographs also exhibit the tired and decaying appearance of the render off the existing elevations. The proposed redevelopment seeks to introduce a lightly coloured painted render to refresh the façade, and be complemented with grey aluminium windows, and matching colour coded metal balustrades to Juliette balconies to the upper floors.
- 6.3 The revamped façade to Coracle Way is shown reproduced in Figure 11 and represents a complete contrast to the visual discord currently on view. The redeveloped façade will seek to replicate that proposed off The Quay and introduce a sense of uniformity, to mimic that evident at Towy Works alongside. It proposes a main entrance to the proposed apartments, partly recessed under an open canopy, but centrally positioned, and afforded equal proportions of vertical emphasis and symmetrical in placement.



Figure 11 – northern elevation proposed to Coracle Way

- 6.4 The redevelopment proposal is shown in massing in the context of the adjoining Towy Works. The proposed façade facing both The Quay and Coracle way rises to a saddled / pitched roofed level. The proposed apartments will rise to an eaves roof level height of 13.3 metres at The Quay, and thus only 2.0 metres higher than the

roof level height of the adjoining Towy Works. The above Figure 11 shows that at Coracle Way the proposed building will rise at roof ridge level to only 4.2 metres higher than the height to Towy Works, however, the proposed redeveloped building **is set back at a recessed position from Towy Works by some 7.0 metres**, meaning that the scale and form of that pitched roof will not be readily apparent from that principal elevation. Photo 16 below illustrates the split-level height of Towy Work, with the original eastern element about the junction with Coracle Way rising to a higher level by some 1.8 metres above its western element adjoining the application building. The Listed Building accordingly illustrates a sense of subordination, reducing in building massing as it expands west along The Quay. At Coracle Way, the split height in listed building is reversed, with the western element rising to be some 1.2 metres higher.

However, Photo 17 below illustrates the application building lies at a recessed position, set considerably back from the Towy Works building line at Coracle Way. The photos also show that the existing building shares a roof ridge level with the adjoining Towy Works.



Photo 16 – view from Towy Bridge to Towy Works and The Waterside, illustrating split height of Towy Works building



Photo 17 – view of Towy Works from foot of Jail Hill, and recessed position of application building

6.5 Towy Works as it adjoins the application building exhibits a depth of 19 metres, which should be compared to the upper floor plan reproduced at Figure 12 below, which illustrates a depth of building at 13.6 metres. The replacement building will accordingly **be recessed by some 5.4 metres** to resemble that currently in evidence by the existing nightclub building.

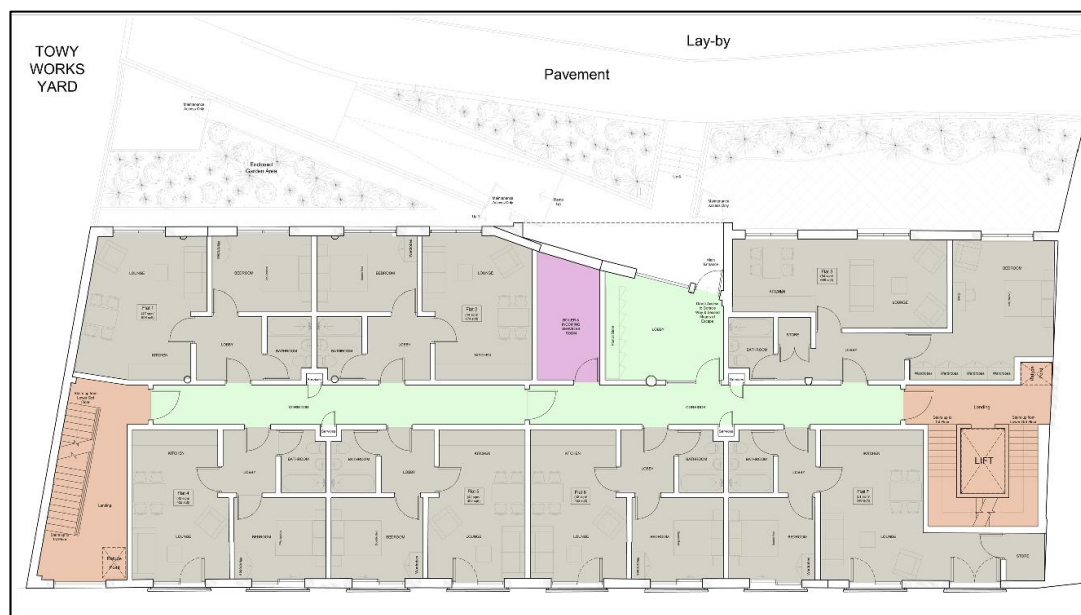


Figure 12 – proposed upper ground floor plan



Photo 18 – view from western side of Coracle Way illustrating below highway level of application site

6.6 Accordingly, the above view from the foot of Jail Hill of Towy Work will not be altered, with a recessed block of apartments, not visible in the streetscene. From a streetscene perspective at Coracle Way, Photo 18 above illustrates the setting of the application building at a below highway level. That will continue in the redevelopment scheme, with the continued recess of the new building being as such as to not allow the new structure to protrude or interfere with the setting of Towy Works, which in contrast is set at highway level, and also directly at a back edge of footway position. Consequently, that sense of subordination will be retained, allowing Towy Works to continue to stand proud and dominate both The Quay and Coracle Way streetscenes. Such a continuation of priority of status in the streetscene will thus be **preserving the setting of the Grade II Listed Building, as required by Section 66 of the Act, and Policies SP13 and EQ1 of the Local Development Plan.**

6.7 The proposals seek to provide a total of 23 no. apartments, all geared to elderly persons (retirement) occupation, enabling 8 apartments cast over each of the first and second floors, and 7 apartments at upper ground floor together with a reception lobby and services room. Figure 13 below provides an illustration of one of the upper floors, with all units being one-bedroomed in scale.



Figure 13 – proposed second floor plan

- 6.8 At lower ground floor onto The Quay, the proposed floor plan is reproduced below at Figure 14, and illustrates a complete void, with only an internal stairwell and cycle storage. It is accepted that the building lies within the fluvial flood plain of the River Towy and is prone to flooding. **The omission of any residential apartment at lower ground floor reflects the flood risk.** The lower floor, if subject to flood ingress, will be inaccessible to residents, visitors and service operatives. The main reception and external access doorway to the residential apartments will access out onto Coracle Way, which unlike The Quay, is not prone to flood risk. The site is afforded with an on-street lay-by onto Coracle Way which will allow emergency vehicles to attend to any resident, and park uninterrupted even in the event of a flood at The Quay.

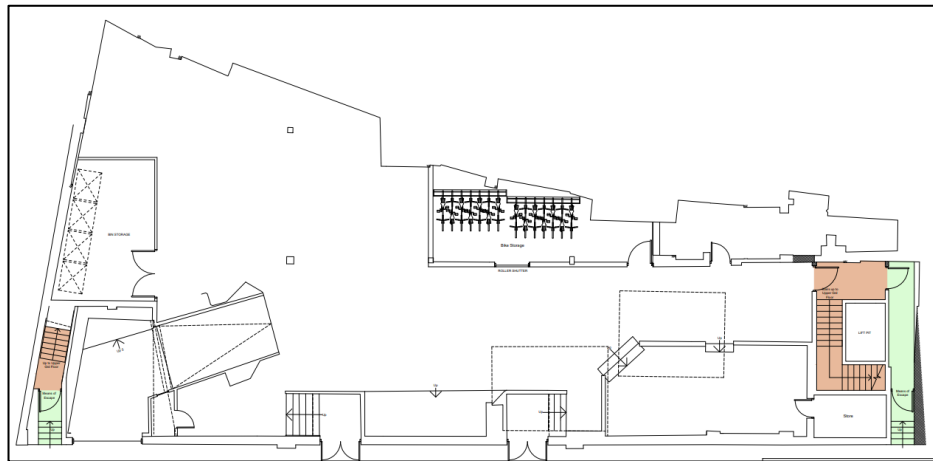


Figure 14 – proposed lower ground floor plan allowing for potential ingress by floodwaters

- 6.9 External openings to that lower level will from an architectural and historic interest position be retained and thus preserving the setting of the Conservation Area. Overall, it is abundantly clear that the redevelopment presents an opportunity to **“enhance” the setting of the Conservation Area**, in line with Section 72 of the Act, and also guidance within PPW, TAN23 and LDP policies. Moreover, the proposals seek to remove an unsightly building, which offers little to the integrity and character of the Conservation Area, and the redevelopment proposals will represent an *“imaginative, high-quality design and an opportunity to enhance the area”* in line with TAN23 advice.

7.0 MANAGEMENT OF FLOOD RISK

- 7.1 The site lies within the fluvial floodplain of the River Towy, which is also subject to tidal inundation. The property lies within a Zone C2 as identified in the Development Advice Maps (DAM), and / or Flood Zone 3 in the “*Flood Map for Planning*.”
- 7.2 However, recent developments to replace existing buildings at The Quay have been granted planning permission and subsequently completed. This is notable at the western side of The Quay, where two multi-storeyed office blocks have been formed.
- 7.3 It is noted that in the case of this building’s redevelopment proposals there **no increase in building footprint**, and thus **no loss of flood storage** has taken place. **No use of the lower ground floorspace**, opening to the quayside has been permitted. Those lower floors are given over to open voids, used for cycle storage and storage space, but with a significant emphasis on not placing any risks to those properties’ occupants, goods, valuables and services during a flood event. If those lower ground floors are flooded, no consequential damage to people and property takes place.
- 7.4 Emergency escape for occupiers in a flood event takes place off the Coracle Way elevation, which remains flood free during a flood event, outside of the designations upon the DAM and FMfP. Such means of escape can equally be applied to the application site, with the **principal entrance directed solely to the Coracle Way elevation**, and the adjacent on-street lay-by, which would allow emergency vehicles to stop and tend to occupiers in a flood-free environment at all times.
- 7.5 The above arrangements and capacity of the site to flood is examined in the accompanying Flood Consequences Assessment, prepared by JBA Consulting.

The FCA denotes that the lower ground floor as shown below is proposed to remain largely as a void, only providing a dry and secure store for cycles and refuse. The internal **raised floor level will be retained**, meaning that the existing arrangement of internal stairs and ramp to access the door openings onto The Quay will **remain unchanged**. **No additional door or window openings** will be introduced at lower ground level.

This equates to the risk level of potential floodwater ingress not depreciating. By contrast, effective flood prevention methods would be **improved** when faced with a flood warning, such as flood barriers over existing openings, and ensuring that all electrical and heating apparatus at that basement level would be set at a high internal wall level to avoid being potentially damaged. Such prevention measures and emergency flood planning have noticeably been deployed at the modern office properties at The Quay and can be equally applied in this redevelopment scheme to **ensure no resident has access to the lower ground level, immediately prior to, during and immediate post a flood event**.

8.0 ENVIRONMENTAL SUSTAINABILITY & MOVEMENT

- 8.1 A total of 23 one-bedroomed apartments are proposed, catering solely for elderly persons / retired occupants. The South Wales County Surveyors Parking Guidelines indicate that development schemes should take into consideration the location of a site in relation to local services such as shops, public services and the availability of not only public transport nodes but also walking and cycling routes.
- 8.2 The site at The Quay lies in a Zone 1 location, being set across the road from Carmarthen Bus Station, and from the Rail Station in only 5 minutes' walk via either King Morgan or Towy Bridges.
- 8.3 Convenience and comparison shops are available on foot at Blue Street and Parc Pensarn. Cafes, public houses, Public Library and high street banks are all accessible on foot via Bridge Street, located across Coracle Way
- 8.4 National Cycle Route 47 runs in front of the building at The Quay, linking to NCN 4 at Pensarn.
- 8.5 The wealth of non-car modes of transport on the actual doorstep of the site renders its location as **wholly sustainable** and thus negates the need for off-road car parking provision.
- 8.6 One hour parking is available directly in front of the property at The Quay, as highlighted below at Figure 15. That restriction is applicable Mondays to Saturdays 8am to 6pm and thus allows some element of parking outside those times. That on-street provision will allow for apartments to be serviced by delivery vehicles via the retained openings off the southern elevation. Such provision could also extend to visiting medical practitioners and support staff, although the retirement apartments will **not** be wardened.
- 8.7 The existing lay-by off the Coracle Way carriageway will remain unaffected, allowing for emergency vehicles to stop and attend to any new apartment occupier in need of treatment.

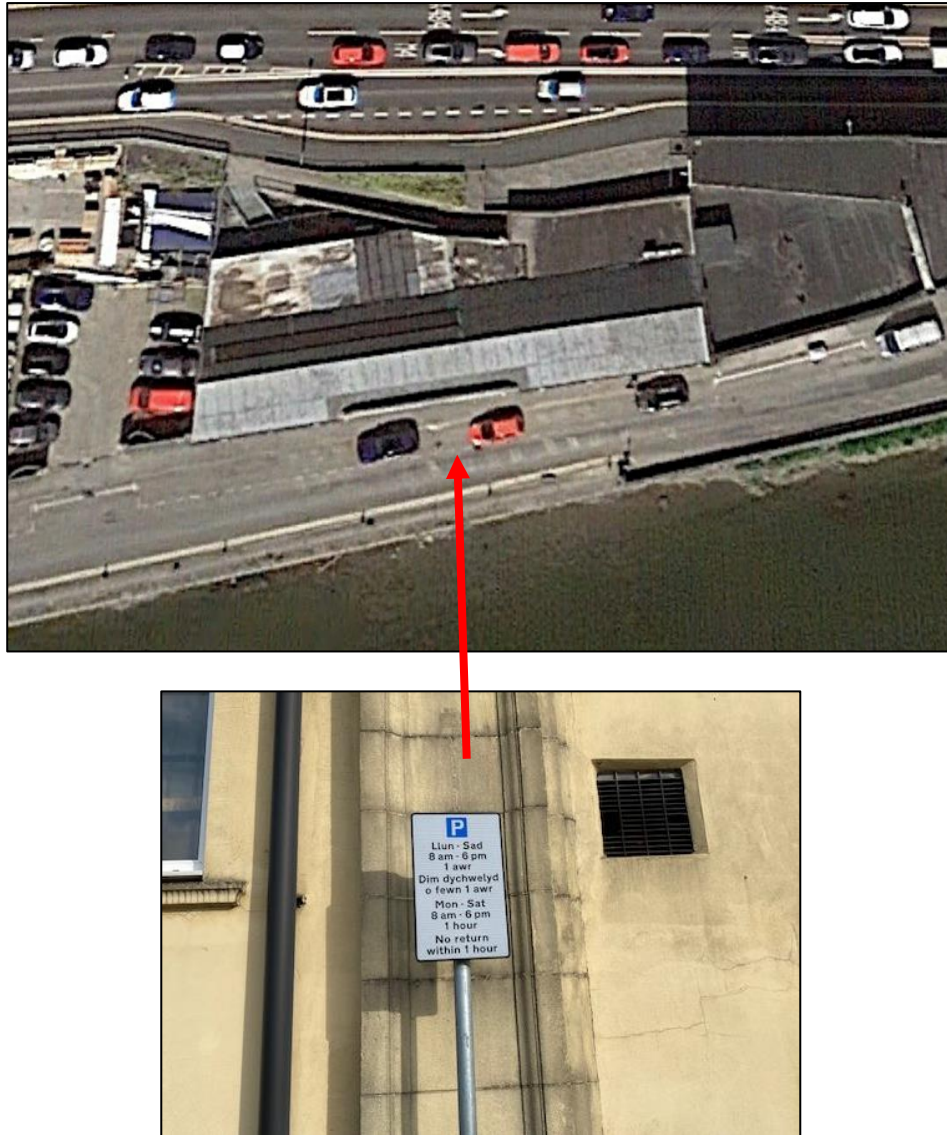


Figure 15 – Availability of On-Street Visitor Parking at The Quay

9.0 COMMUNITY SAFETY

- 9.1 The proposals will allow the principal elevations of the residential apartments to be publicly viewed from the adjacent carriageways of Coracle Way and The Quay. Furthermore, the degree of separation between the built form and boundaries of the site will be retained. This ensures that a healthy degree of natural sunlight will flourish.
- 9.2 The complete lack of overbearance between neighbouring properties, will allow a sense of natural surveillance will be actively promoted. Towy Works will retain a dominant presence overseeing the site from the east, with its open yard to the western side allowing views from the above highways directly into that side façade of the site.

10.0 CONCLUSION

- 10.1 The Waterside represents a bland, commercial building set with frontages to The Quay and Coracle Way streetscenes. It exhibits an industrial-style, pitched roof over the majority of building, but with unsightly flat-roofed additions off its Coracle Way elevation. Those additions are disjointed in form, scale and use of contrasting external materials. The elevation overlooking The Quay and Towy riverside is deteriorating, tired in appearance and is equipped with white upvc windows offering a poor contrast to the fine Grade II Listed Building at Towy Works. The building as a whole **makes no positive contribution** to the appearance and character of The Quay / Towyside Conservation Area.
- 10.2 That Conservation Area has experienced extensive redevelopment in recent years. Its **special character has evolved and adapted** through modern, replacement constructions. Modest, two-storey commercial buildings have been replaced with three and four storey office constructions which dominate the riverside, and the remaining adjacent buildings alongside. Passers-by walking along Towy Bridge and King Morgan Bridge are **now distracted to that change**, as well as the special attributes of Towy Works. The Waterside can be described as one building which is badly in need of redevelopment.
- 10.3 The redevelopment proposals seek to retain the overall massing and height of the existing structure, with new residential apartments **rising to an equivalent eaves roof height** of the adjoining Towy Works. The new apartments will retain a pitched roof, the new apartment block will exhibit a roof shape and form **to complement and mimic new redeveloped buildings to the western side of The Quay**. Proposed external finishing materials seek to take inspiration and lead from those used in the afore-mentioned office developments at The Quay and also be more respectful to the refurbished building's position and close setting to Towy Works.
- 10.4 The proposed building line at Coracle Way will continue to be recessed significantly behind that at Towy Works, thus allowing that Listed Building to remain as the proud and dominant feature at the eastern end of the Conservation Area. Its overall setting as a Listed Building will accordingly be preserved in accordance with legislation, but also significantly enhanced through the complete removal of a tired and unbecoming neighbour.
- 10.5 In conclusion, this Heritage Impact Assessment has sought to examine the character and setting of The Quay / Towyside Conservation Area and constituent Listed Buildings and Structures. It has reviewed Primary Legislation, together with National and Local Planning Policies and duly applied them to this case. It fully demonstrates as a result, that the proposed redevelopment proposals not only preserve but also wholeheartedly enhance the character and setting of that Conservation Area, and also the setting of nearby Listed Buildings.