

**acstro**

# **Transport Statement**

**New Industrial Unit at  
Dyfed Steels Ltd.  
Dafen  
Llanelli**

July 2024

## Table of Contents

1	Introduction.....	1
2	Policy Context.....	3
3	The Site .....	8
4	Transport Links.....	9
5	Proposed Development .....	14
6	Summary & Conclusion .....	15

## Appendices

### *Appendix 1 Site Context*

## Revision History

A	10 <sup>th</sup> July 2024	First Issue
B	18 <sup>th</sup> July 2024	Final

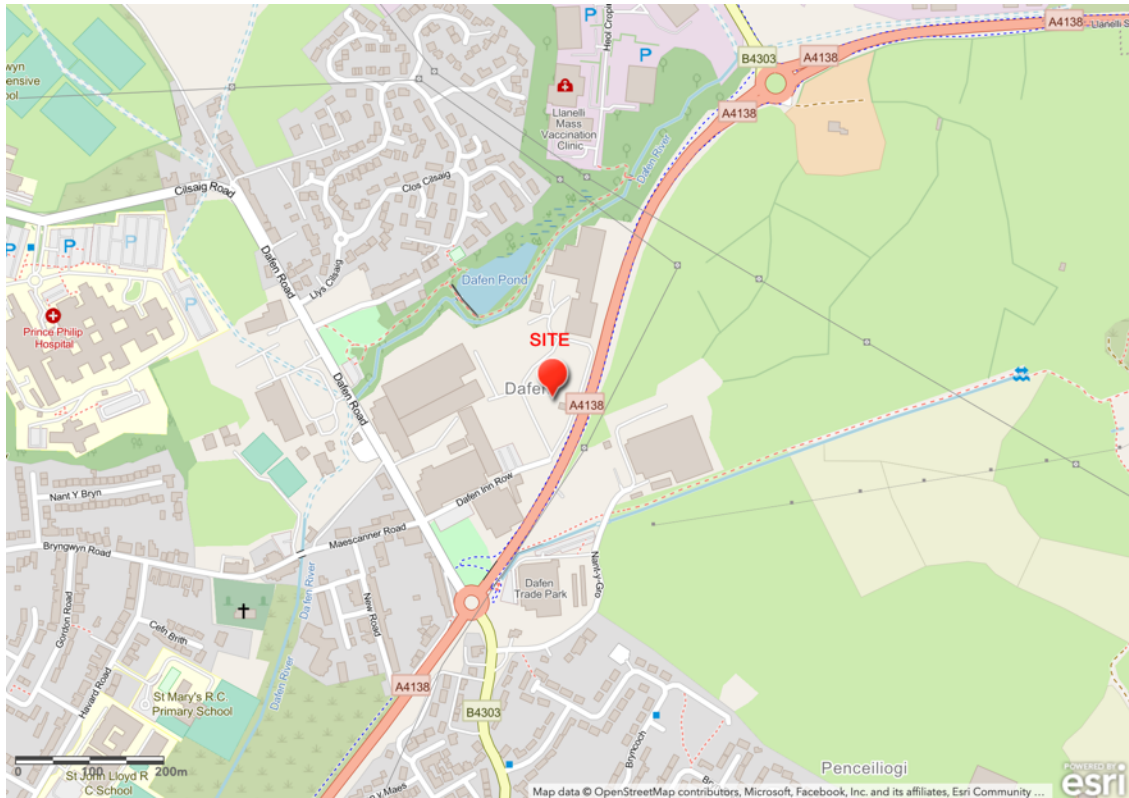
1763-ACS-ZZ-XX-RP-T-001-B Transport Statement.docx

This report has been prepared for the exclusive use of our client and unless otherwise agreed in writing by Acstro Limited, no other party may copy, reproduce, distribute, make use of, or rely on the contents of the report. Acstro Limited assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its content.

© 2024 Acstro Limited

## 1 Introduction

- 1.1 Acstro has been appointed, on behalf of Dyfed Steels Ltd, to prepare a Transport Statement to support a planning application for the development of a new industrial unit at Dyfed Steels, Maescanner Road, Dafen, Llanelli, SA14 8NS. The general location of the site is shown in Figure 1.



**Figure 1 Location Plan**

- 1.2 Dyfed Steels Ltd is the largest independent steel stockholder and processor of steel in Wales and the South West of England. The business has over 23,000 tonnes of stock across their locations around the UK, with 10 branches in the region offering a comprehensive range of steel processing services. The business services more than 2000 customers across a range of sectors including agriculture, construction and engineering, having continuously invested in the most sophisticated machinery to offer a complete range of steel processing services.
- 1.3 Dyfed Steels is a significant employer in Llanelli, operating from two locations and headquartered in Dafen. The firm currently employs approximately 180 members of staff at its head office in Llanelli and has operated in the town for over 45 years, playing an important role in the economy of Llanelli and West Wales. It is envisaged the proposed development will stimulate further economic growth, increasing production capacity and attracting new business opportunities.
- 1.4 This document considers the transport implications of the proposed development. It demonstrates that the site is in a sustainable location that is closely related to existing facilities and services and is accessible to pedestrians, cyclists and public transport users. It is also demonstrated that safe vehicular access to the site can be provided and adequate parking provision is made for the future occupiers and users of the site.

1.5 The structure of the Transport Statement is as follows:

- Section 2 describes the relevant planning policy context that is relevant in terms of transport issues;
- Section 3 describes the site.
- Section 4 describes the site's proximity to services and facilities and its accessibility by all forms of transport.
- Section 5 describes the proposed development and its access arrangements.
- Section 6 provides a summary and conclusion.

## 2 Policy Context

### [Future Wales - The National Plan 2040](#)

- 2.1 This is the national development framework that sets out the direction for development in Wales to 2040.
- 2.2 Policies 11 and 12 relate to national and regional connectivity, respectively. These seek to encourage longer-distance trips to be made by public transport, while also making longer journeys possible by electric vehicles. In urban areas, to support sustainable growth and regeneration, the priorities are improving and integrating active travel and public transport. In rural areas the priorities are supporting the uptake of ultra-low emission vehicles and diversifying and sustaining local bus services. Active travel must be an essential and integral component of all new developments.

- 2.3 Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points.

### [Planning Policy Wales \(12<sup>th</sup> Edition\)](#)

- 2.4 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.
- 2.5 In terms of transport related policies paragraph 4.1.1 states that “the planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport”.
- 2.6 Paragraph 4.1.10 states that “the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:
- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
  - are designed in a way which integrates them with existing land uses and neighbourhoods; and
  - make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.”
- 2.7 PPW advocates a sustainable transport hierarchy for planning, the hierarchy being, from top to bottom:
- Walking and Cycling
  - Public Transport
  - Ultra Low Emission Vehicles
  - Other Private Motor Vehicles
- 2.8 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles.

- 2.9 However, for most rural areas the opportunities for reducing car use and increasing walking, cycling and use of public transport are more limited than in urban areas. In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. (paragraph 3.39).
- 2.10 The transport hierarchy recognises that Ultra Low Emission Vehicles (ULEV) also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services. To this end the provision of ULEV charging points is encouraged within new developments.
- 2.11 PPW recommends (4.1.51) that “a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed”.

[Llwybr Newydd – The Wales Transport Strategy 2021](#)

- 2.12 This document sets out the Welsh Government’s vision for how the country’s transport system can help deliver on a pathway to creating a more prosperous, green and equal society. It lists its priorities as being:
1. Bringing services to people in order to reduce the need to travel. To this end a target has been set that of 30% of the workforce works remotely on a regular basis.
  2. Allow people and goods to move easily from door to door by accessible, sustainable and efficient transport services and infrastructure.
  3. Encourage people to make the change to more sustainable transport.
- 2.13 Modal shift is at the heart of Llwybr Newydd. This means the proportion of trips made by sustainable modes increases and fewer trips are made by private cars.
- 2.14 The Welsh Government has set a target of 45% of journeys to be made by public transport, walking and cycling by 2040. This represents an increase of 13 percentage points on the estimated baseline (2021) mode share of 32%.

[TAN18 Transportation](#)

- 2.15 Planning Policy Wales Technical Advice Note 18 (TAN18) details the Welsh Government’s policies in terms of transportation and repeats the general principles advocated in PPW i.e. that development is encouraged in sustainable, accessible, locations that will reduce the need to travel by car. Its aim is to promote an efficient and sustainable transport system and to counter the negative impacts associated with road traffic growth, for example increased air pollution, green house gases and congestion (2.1). It sees the integration of transport and land use planning as key (2.3) in achieving the Welsh Government’s sustainable development policy objectives by:
- promoting travel efficient settlement patterns;
  - ensuring new development is located where there is good access by public transport, walking and cycling thereby minimizing the need for travel and fostering social inclusion;

- managing parking provision;
  - ensuring that new development includes appropriate provision for pedestrians, cycling, public transport, and traffic management and parking/servicing;
  - encouraging the location of development near other related uses to encourage multi-purpose trips; and
  - ensuring that transport infrastructure necessary to serve new development allows existing transport networks to continue to perform their identified functions.
- 2.16 The needs of walkers and cyclists must be taken into consideration and the use of these most sustainable forms of transport encouraged in all developments (TAN18 Chapter 6). Similarly, all development should be accessible by public transport (Chapter 7).

[The Active Travel \(Wales\) Act 2013](#)

- 2.17 The Active Travel (Wales) Act 2013 is Welsh Government legislation aimed to support an increase in the level of walking and cycling in Wales; to encourage a shift in travel behaviour to active travel modes, and to facilitate the building of walking and cycling infrastructure.
- 2.18 The Active Travel (Wales) Act 2013 requires local authorities in Wales to produce maps of walking and cycling networks in their local area, known as Active Travel Network Maps (ATNMs). These maps are designed to show two main things:
- **Existing routes** – those current walking and cycling routes that already meet Welsh Government active travel standards, meaning they can be readily used for everyday journeys, and
  - **Future routes** – new routes that the local authority proposes to create in the future, as well as current routes that are planned for improvement to bring them up to the standards.
- 2.19 An extract from the ATNM is provided below and shows that the site is well connected to a number of existing and future active travel routes.



**Figure 2 Active Travel Network Map**

[Carmarthenshire Local Development Plan \(LDP\), 2014-2021.](#)

- 2.20 The Carmarthenshire Local Development Plan (LDP) was adopted in December 2014, and sets out the Authority’s policies and proposals for the future development and use of land. The LDP will guide development up to 2021.
- 2.21 Transport and Accessibility Policy is outlined in Section 6.5, which describes the fundamental nature of an integrated and sustainable transport system to the delivery of the LDP strategy, which focuses growth in a way which reflects the sustainability of settlements and their accessibility in terms of the highway network and access to bus routes.
- 2.22 Policy TR2 applies to the transport considerations for the location of a development. It states that proposals which have a potential for significant trip generation will be permitted where:
  - It is located in a manner consistent with the plans strategic objectives, its settlement framework and its policies and proposals;
  - It is accessible to non car modes of transport including public transport, cycling and walking;
  - Provision is made for the non-car modes of transport and for those with mobility difficulties in the design of the proposal and the provision of on site facilities;
  - Travel Plans have been considered and where appropriate incorporated.



2.23 Policy TR3 applies to the design considerations of highways in developments. The design and layout of all development proposals will, where appropriate, be required to include:

- An integrated network of convenient and safe pedestrian and cycle routes (within and from the site) which promotes the interests of pedestrians, cyclists and public transport;
- Suitable provision for access by public transport;
- Appropriate parking and where applicable, servicing space in accordance with required standards;
- Infrastructure and spaces allowing safe and easy access for those with mobility difficulties;
- Required access standards reflective of the relevant class of road and speed restrictions including visibility splays and design features and calming measures necessary to ensure highway safety and the ease of movement is maintained, and where required enhanced;
- Provision for Sustainable Urban Drainage Systems to allow for the disposal of surface water run-off from the highway.

2.24 Policy TR4 refers to cycling and walking and states that developments should, where appropriate seek to incorporate, or where acceptable, facilitate links to the cycle, rights of way and bridleway network to ensure an integrated sustainable approach in respect of any site.

[CSS Wales – Wales Parking Standards \(2014\)](#)

2.25 Parking requirements for new development in Carmarthenshire is set out in CSS Wales 2014 Wales Parking Standards. The document provides differing requirement dependent on the type of development and its location. It is considered that the application site is in a 'Zone 3' (urban) location.

2.26 For industrial developments located in zones 2 to 4 the recommended car parking provision for industrial units is one space per 120m<sup>2</sup> of floorspace.

2.27 No additional car parking will be provided as part of the development. Justification will be provided later in this document.

2.28 Cycle parking provision should be a minimum of 1 stand per 1000m<sup>2</sup> of floor area. For the proposed industrial unit this equates to 3 stands. Covered and secure cycle storage areas are already provided at Dyfed Steels and can accommodate the required number of additional cycles. Further details are provided later.

### 3 The Site

3.1 The application site's location and transport links are shown in context in Appendix 1.

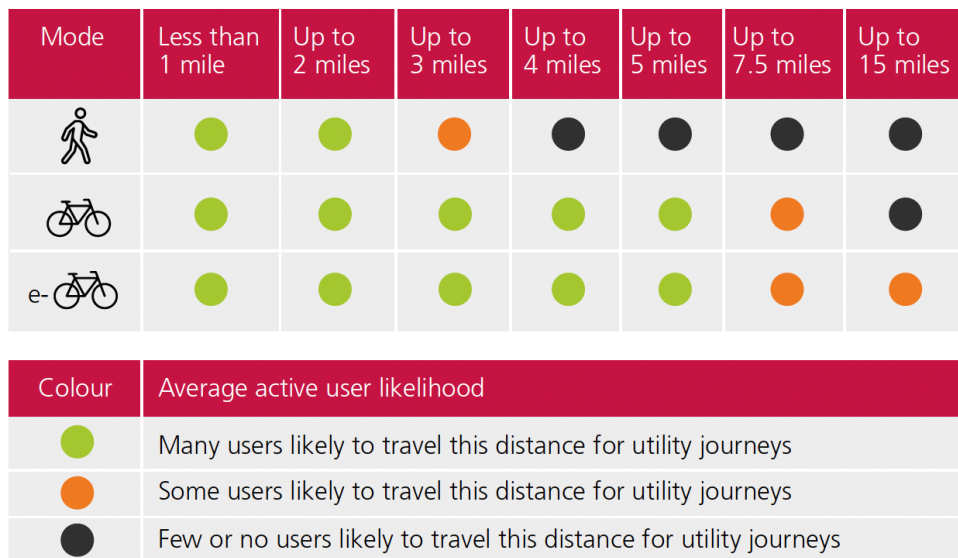
*Appendix 1 Site Context*

- 3.2 The application site is located within the operational curtilage of the Dyfed Steels site in Dafen, a village situated in the east of Llanelli.
- 3.3 The Dyfed Steels site occupies a prime position adjacent to the A4138 which links the M4 corridor to the town of Llanelli. The site lies within an established employment area, with similar neighbouring uses to the north, east and south.
- 3.4 In respect of wider surroundings, the Dyfed Steels site is situated in an area that can be characterised as 'mixed-use', however predominantly led by established employment land uses found to the north, east and west. A number of residential properties are situated in the wider locality north of the site at Clos Cilsaig & North Terrace. Further residential dwellings are found to the west of Dafen Road.

## 4 Transport Links

### Active Travel

- 4.1 Active travel is a term used to describe walking and cycling for purposeful journeys (also referred to as utility journeys) to a destination, or in combination with public transport. Whilst walking and cycling are in themselves healthy activities that are to be encouraged, it is when they displace car journeys that they deliver significant benefits. The Welsh Government’s *Active Travel Act Guidance* (2021) suggests that many people will walk up to 2 miles (approximately 3km) or cycle up to 5 miles (approximately 8km) for utility journeys.



**Figure 3 Typical Distance Range for Active Travel**

(Source: Active Travel Guidance Table 4.1)

- 4.2 Figure 4 shows the areas that are within 2-miles of the application site where utility journeys to and from the site may be viable on foot. Figure 5 shows the areas within a 5-mile catchment area where cycling may be a viable form of travel to and from the site.
- 4.3 The walking catchment area includes extensive areas of Llanelli, whilst the cycling catchment area extends as far east as Loghor and Gorseinon, west to Pwll and the edges of Burry Port and north to Pontarddulais.

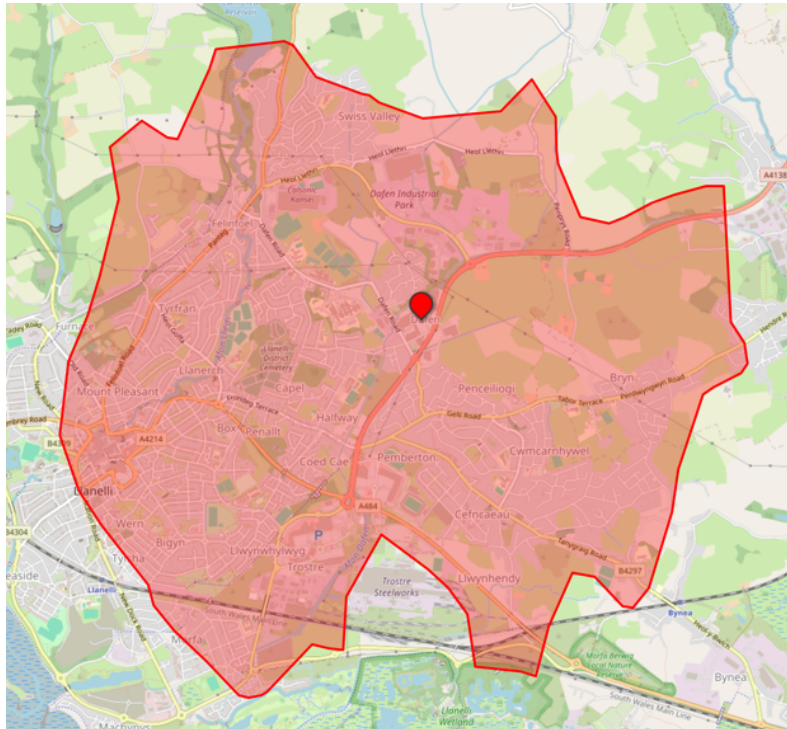


Figure 4 2-Mile Walk Catchment

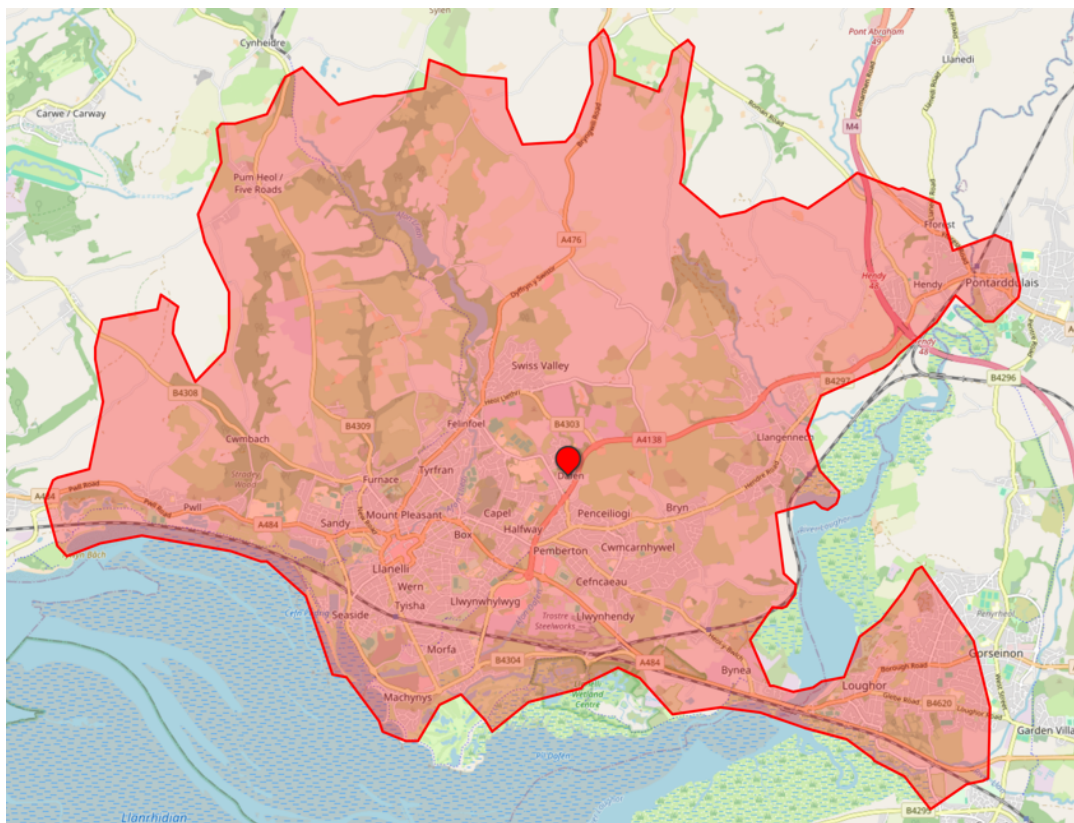


Figure 5 5-Mile Cycle Catchment

- 4.4 There have been extensive improvements to the active travel network that serves the site in recent years, including an active travel route that runs along the A4138 linking the M4 at Hendy to Dafen and Trostre. This route will eventually link with the Millenium Coastal Path.
- 4.5 The site is accessible to pedestrians and cyclists via the network of active travel routes that connect to it. These were shown earlier in Figure 2. They include a segregated cycleway that runs along the A4138 to the north east to Llangennech, Hendy and Pontarddulais. The cycleway branches off and flows the B4303 (Llethri Road), providing a link to Felinfoel and Swiss Valley.
- 4.6 To the south of the site, the cycleway accessed from New Road runs parallel to the A4138 to Trostre, allowing for connection to the National Cycle Network Route 4, which follows the coastline east to Loughor and west to Burry Port (and further destinations in both directions).
- 4.7 For pedestrian movements. near the site, there are two zebra crossings of the B4303 (Dafen Road and Exchange Row) located either side of the Dyfed Steels site (within approximately 50m). There is an underpass beneath the A4138 at the Dafen Roundabout, allowing for safe crossing to Pemberton and other areas located to the south east.
- 4.8 The close relationship between the development and the residential areas within walking and cycling distance and the high quality active travel network that exists increases the possibility that many of the commuter trips generated by the development can be made on foot or by bike. This delivers many benefits including a reduction in road congestion, improved air quality, improved physical and mental health and improved social interaction and sense of community.

#### Public Transport

- 4.9 There are bus stops adjacent to the site on Dafen Road (referred to as the Dyfed Steel bus stops). They provide access to the L3 and L5 services that are detailed in the table below, which all link to Llanelli's bus station where connecting services can be accessed.

Service Number	Route	General Frequency
L3	Llanelli - Pontarddulais	7 Journey Each Way (Mon - Sat)
L5	Llanelli - Dafen	4 Journey Each Way (Wed & Sat Only)

**Table 1 Bus Services Serving Nearby Bus Stops**

- 4.10 Llanelli railway station is approximately 2½ miles / 15 minutes cycle ride from the site. There are regular rail services west towards Carmarthen and east to Swansea and Cardiff along the south Wales main line. There are also 5 train services per day in each direction along the Heart of Wales line towards Ammanford.

#### Highway Access

- 4.11 The site is accessed from the B4303, which links to the A4138 at the Dafen Roundabout. North of the site the B4303 is known as Dafen Road and continues past the Prince Philip Hospital to link with the A476 at Felinfoel. The short length of the B4303 between the Dyfed Steels site and Dafen Roundabout is known as Exchange Row.
- 4.12 In the vicinity of the site the B4303 is approximately 8m wide and has a straight alignment. There are no waiting / loading restrictions in place adjacent to the Dyfed Steels site. The road is subject to a 20mph speed limit.

- 4.13 One of Dyfed Steels' two points of access emerges directly onto Dafen Road. This provides access to the business' yard area and is principally used by HGV's. The access is approximately 7m wide with radii of approximately 10m. There is good visibility from the access in both directions. The access arrangement allows for heavy vehicles to move efficiently and safely between the site and the public highway.
- 4.14 The site's second access is located at the eastern end of Dafen Inn Row, a cul-de-sac that joins the B4303 at the south western corner of the Dyfed Steels site. Dafen Inn Row is approximately 190m in length and provides access to two parking areas.
- 4.15 There is a 46-space public car park located to the south of the street. There is another 43-space car park located to the north of the street, within Dyfed Steels' ownership. Dyfed Steels also has approximately 20 off-street car parking spaces arranged behind the footway around the south west corner of the site, near the junction of Dafen Road and Dafen Inn Row.
- 4.16 On-street parking also occurs along Dafen Inn Row and causes no operational or safety issues because of the absence of through traffic.



**Figure 6 Dafen Road (Access to Dyfed Steels on the Right)**



**Figure 7 Dafen Inn Row (Dyfed Steels on the Left)**

- 4.17 Dafen Roundabout is located some 200m from the site and provides access to the A4138 and the strategic road network. This means that heavy goods can be transported to and from the site without having to travel on unsuitable lower category roads or through areas that may be sensitive to the impacts of heavy vehicle movements e.g. residential areas or past schools.

#### Summary

- 4.18 The site is in a sustainable and accessible location. The site is accessible to pedestrians, cyclists and public transport users. This increases the possibility that journeys generated by the development can be made by sustainable forms of transport.
- 4.19 The highway network serving the site has a good safety record with no collisions recorded as a result of conflicting movements at junctions or involving pedestrians. Two collisions have occurred in which cyclists were injured. There are proposals for the introduction of a cycle route along the A40 which will improve conditions for cyclists.

## 5 Proposed Development

- 5.1 The proposals comprises of the erection of a new industrial warehouse unit providing approximately 3,000m<sup>2</sup> of Use Class B2 (general industrial) employment floorspace.
- 5.2 The industrial warehouse unit will be utilised to house higher grades of hollow sections of steel. The new unit will also house the installation of a tube laser machine. A single laser machine is currently operated from the site however business need dictates that a second machine is required to satisfy customer demands.
- 5.3 The proposed development will allow the company to expand its product range and respond to changing business conditions. The development is not expected to lead to a significant increase in staff numbers, which has been estimated at an increase of 6 to 10 employees.
- 5.4 No alterations are proposed in respect to the site's access and parking arrangement.
- 5.5 Access to the new unit will be via the existing site accesses from Dafen Road and Dafen Inn Row, both of which have served the business successfully and safely for many years.
- 5.6 The development will have no material impact on the business' HGV traffic generation.
- 5.7 The site is in a sustainable location, connected to a growing network of active travel routes and has bus stops located adjacent to it. Commuting by walking, cycling or public transport is therefore a very realistic proposition for much of the workforce.
- 5.8 Travelling by sustainable modes of transport is encouraged and to that end, given that the increase in staff numbers is not expected to be significant, no additional off-street car parking will be provided as part of the development. There is a covered area within the existing buildings that is used by staff travelling by bike to park/store bicycles. There is ample room here to accommodate an increase in the number of staff cycling to work.



## 6 Summary & Conclusion

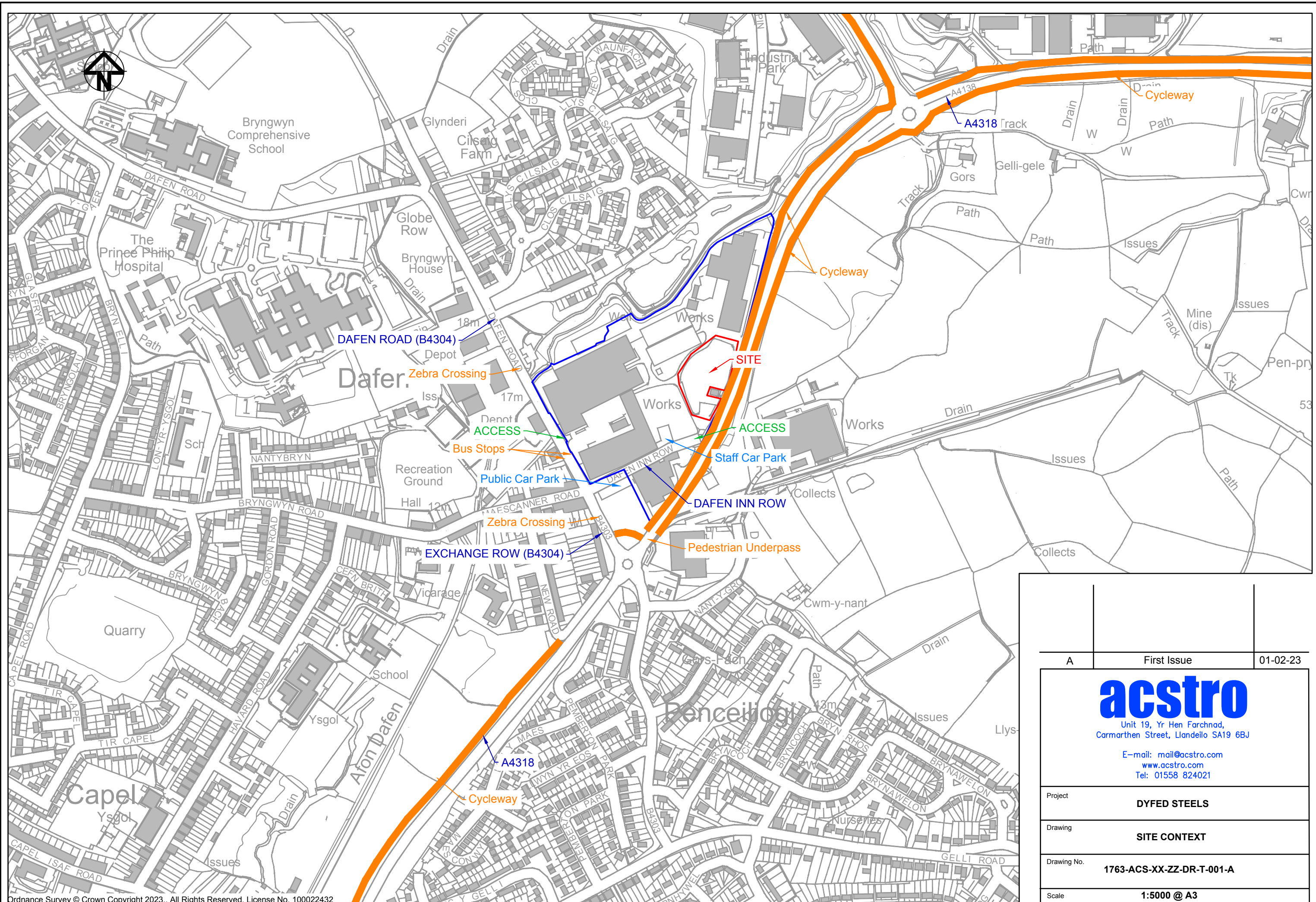
6.1 In summary this Transport Statement has demonstrated that:

- The site is accessible to pedestrians, cyclists and public transport users meaning that users of the development will not be reliant on the car.
- The site is well connected to the strategic highway network, allowing the transport of heavy goods to and from the site to utilise appropriate routes that avoid lower category roads and sensitive areas.
- The site has two points of access; from Dafen Road and from Dafen Inn Row. The accesses are appropriate for the use of the site and have operated satisfactorily for many years.
- The proposed development is for an industrial unit that will expand the company's product range.
- There will be little change in the number of employees travelling to site daily as a result of the development. Similarly there will be no discernible increase in the number of HGV movements. The traffic impacts of the development are therefore neutral.
- Given the sustainable location of the site, which is highly accessible to pedestrians, cyclists and public transport users, and the insignificant increase in staff numbers that the development will bring about, no additional off-street car parking provision is proposed.

6.2 It is considered that the site meets planning policy requirements in terms of being in an appropriate location that is safely accessible by all forms of transport and that the impacts of the development on the continued operation and safety of the surrounding highway network would be acceptable.

6.3 It is concluded therefore that there are no transport related issues that should prevent planning permission for the proposed development.

## ***Appendix 1 Site Context***



A	First Issue	01-02-23
 Unit 19, Yr Hen Farchnad, Carmarthen Street, Llandello SA19 6BJ E-mail: <a href="mailto:mail@acstro.com">mail@acstro.com</a> <a href="http://www.acstro.com">www.acstro.com</a> Tel: 01558 824021		
Project	<b>DYFED STEELS</b>	
Drawing	<b>SITE CONTEXT</b>	
Drawing No.	<b>1763-ACS-XX-ZZ-DR-T-001-A</b>	
Scale	<b>1:5000 @ A3</b>	

# acstro

Acstro Ltd., Yr Hen Farchnad, Unit 19, Carmarthen Street, Llandeilo, Carmarthenshire SA19 6BJ

(01558) 824021  
[www.acstro.com](http://www.acstro.com)