

# DYFED STEELS

## PROPOSED INDUSTRIAL BUILDING, DYFED STEEL, DAFEN

### PRELIMINARY ECOLOGICAL APPRAISAL

30 August 2024



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PRELIMINARY ECOLOGICAL APPRAISAL

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1		DRAFT FOR REVIEW	30/08/2024	David Rees
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## SUMMARY

David Rees was commissioned by Dyfed Steels to undertake an ecological appraisal of a parcel of land located in the Dyfed Steels site in Dafen, Llanelli. The parcel of land is currently utilised as a storage yard with some waste land and will be developed as the location of a new industrial building.

The combination of desk and field surveys undertaken at the site identified the footprint as being dominated by a hard aggregate storage yard with sparse tall ruderal vegetation to the north and west; whilst a small raised plateau of disturbed land was located to the south and east of site that possessed a mosaic of neutral grassland, tall ruderal habitat and scrub that surrounded a prefabricated building. The footprint was surrounded by the wider Dyfed Steels site to the north and west; whilst the A4138 and associated scrub/treeline was located to the south and east.

The proposed development works will result in the loss of the stone aggregate yard and potentially the majority of the plateau containing the neutral grassland, tall ruderal and scrub habitats (Appendix IV). The stone aggregate yard was considered to be of negligible ecological interest. The grassland, tall ruderal and scrub were considered to be limited botanical diversity due to the recent colonising of the plateau after scrub clearance, whilst the resilience of these habitats is considered to be short term with the presence Japanese Knotweed colonising the grassland on the plateau. The plateau habitats were considered to be of ecological importance on a site/local context and potentially utilised by nesting birds (scrub), foraging and commuting mammals and small numbers of amphibians.

To offset the loss of the grassland and tall ruderal habitat it is recommended that the new industrial building's Sustainable drainage systems (SuDS) is allowed to naturally colonise with native species from adjacent grassland verges (A4138). Alternatively to provide a more diverse botanical composition onsite the SuDS can be seeded with either a general purposed wildflower seed mix or a wildflower mix for wetlands if regular inundation by water is expected within the SuDS.

The potential presence of nesting birds within the marginal scrub means that it is recommended that any clearance is conducted outside the bird nesting season (March-September) or preceded by a visual check. The reptile survey conducted onsite identified no common reptiles onsite. However it is recommended that a precautionary sensitive directional vegetation clearance is adopted to the eastern boundary with any loose refugia removed by hand. Any amphibians identified during refugia searches will be released in the offsite marginal habitats located north of site.

To enhance the resources for nesting birds on the warehouse it is recommended that 6 No. Swift Boxes are erected on the northern and eastern elevations of the industrial building; whilst 6 No. Bat Boxes are erected on the southern and eastern elevation. It is also recommended that any soft landscaping include species of local provenance and benefit to wildlife.

## 1.0 INTRODUCTION

- 1.1 David Rees was commissioned by Dyfed Steels to undertake an ecological appraisal of a parcel of land located in the Dyfed Steels site in Dafen, Llanelli (Grid Ref: SN 53173 01306)(Appendix I). The parcel of land is currently utilised as a storage yard with some waste land and will be developed as the location of a new industrial building.
- 1.2 The site footprint is approximately 0.63Ha in area and is dominated by a hard aggregate storage yard with sparse vegetation to the north and west, whilst a small raised plateau of disturbed land with a mosaic of neutral grassland, tall ruderal habitat and scrub surrounded a prefabricated building to the south and east. The footprint was surrounded by the wider Dyfed Steels site to the north and west; whilst the A4138 and associated scrub/treeline was located to the south and east.
- 1.3 The grassland, tall ruderal and scrub were considered to be suitable habitat to support small populations of Common Reptile such as Slow-worm *Anguis fragilis* and Common Lizard *Zootoca vivipara*. The features were generally considered to be an isolated feature surrounded by hard standing/stone aggregate. However, the A4138 grassland and scrub margins were located approximately 10m east of site; and as such a reptile presence/absence survey was conducted between 9<sup>th</sup> May and 7<sup>th</sup> June 2024.
- 1.4 This report provides a summary of the preliminary ecological appraisal and reptile surveys conducted between May and June 2024, and includes recommendations on any ecological constraints/ opportunities associated with the proposed development.

## 2.0 METHODOLOGY

2.1 In order to establish the baseline ecological conditions on site and in the adjoining habitats, a combination of desk-based consultation, field survey and reptile survey were undertaken between May and June 2024.

### Desk study

2.2 This element of the work primarily involved a West Wales Biodiversity Information Centre (WWBIC) data search and review of existing Bay Ecology reports conducted within a 2km radius to identify any statutory or non-statutory conservation designations, as well as records of rare, protected or notable flora and fauna within the proposed site boundary (see plan in Appendix I) and surrounding 1 km area.

### Extended Phase I Habitat Survey

2.3 Fieldwork was undertaken on the 9<sup>th</sup> May and 6<sup>th</sup> June 2024 to identify flowering botanical species by a suitably qualified ecologist and followed standard Phase 1 Habitat Survey protocol (JNCC 1990) as amended by the Institute of Environmental Assessment (1995). All habitats within the proposed development site were classified. All habitats considered having potential to support rare, protected or otherwise notable species of flora and fauna were noted, as were any direct signs of these species (e.g. Badger setts and dung-pits). The survey also incorporated a subjective, ground-based assessment of the potential of mature trees or structures on site to support roosting bats. See Appendix II for Phase 1 Map.

2.4 During the field survey, any trees immediately adjacent to the site were assessed for their potential to support roosting bats and were categorised in relation to the bat roosting features (BCT, 2023)(relevant guidelines at the time of the surveys). The categories are as follows:

- Known or confirmed roost
- High Roost Suitability – A tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats (PRF-M) on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
- Moderate Roost Suitability – A tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.

- Low Roost Suitability – A tree of sufficient size and age to contain Potential Roosting Features (PRFs) but with none seen from the ground or features seen with only very limited roosting potential. The tree only contains PRFs that are suitable for individual or small numbers of bats (PRF-I).
- Negligible - Negligible habitat features on site likely to be used by roosting bats.

### *Building Inspection*

2.5 The ecological appraisal comprised of an external and internal inspection of the buildings onsite. In order to establish the potential presence of roosting bats (or nesting birds) at the warehouse, the survey aimed to identify:

- if bats are, or have been, present within the building and, if so, which species are present;
- the type of roost (e.g. day roost, feeding perch, night roost, hibernaculum);
- how bats use the buildings (e.g. location of, exit and entrance points to potential roosts);

2.6 External surveys at the site involved the use of binoculars and ladder to identify possible access/entry points into the buildings and aimed to identify any evidence of use by bats such as droppings, staining, prey remains etc. The internal survey searched for similar evidence of current or historical use by bats. The survey was undertaken from ground-level around the exterior of the buildings; and was assisted by the use of close-focus binoculars and a high powered torch (1 million candlepower).

2.7 The surveyor searched for roost evidence (droppings, staining, scratch marks, etc.) as described above and an assessment of the buildings potential to support nesting birds was also undertaken. The scope of the bat inspection survey was based on guidelines published by the Bat Conservation Trust (BCT)(2023).

### *Reptile Surveys*

2.8 A reptile presence/absence survey was undertaken based on the guidelines described by Froglife (1999) and involved the deployment and subsequent checking of artificial refugia (e.g. 0.5 x 0.5 m squares of roofing felt). A total of 40 refuges were deployed within potentially suitable grassland, tall ruderal and scrub habitats located in the disturbed land plateau.

2.9 These refuges were set out on 9th May 2024 and following a settling in period were subsequently checked a total of seven times between the 16th May and 7th June for basking and sheltering reptiles



under suitable environmental conditions. A location plan showing the location of reptile refuges across the site is shown in Appendix III.

#### *Additional Considerations*

2.10 Additionally any species listed as a pernicious weed under Schedule 9, Section 14 of the Wildlife and Countryside Act 1981 (as amended) were also noted during the field survey. Examples of such species include Japanese Knotweed *Fallopia japonica* and Himalayan Balsam *Impatiens glandulifera*.

## 3.0 RESULTS

### Desk study

- 3.1 The internet data search and Bay Ecology report review confirmed that the site did not contain any statutory or non-statutory conservation designations.
- 3.2 The data search identified no records of protected species onsite. However, multiple records of protected species that were dominated by records of Hedgehog *Erinaceus europaeus* and Water Vole *Arvicola amphibius* that were associated with the Afon Dafen located approximately 200m north of site. The Hedgehog was considered to be some relevance to the boundary scrub. However, the Water Vole was of negligible relevance to site. Individual records of roosting Pipistrelle *Pipistrellus sp.* were identified within a 1km radius of site and were considered to be of relevance to the warehouse onsite and boundary scrub/treeline (foraging/commuting). Records of Slow-worm *Anguis fragilis* and Common Lizard *Zootoca vivipara* were also identified and considered to be of some relevance to the disturbed land plateau. However, there was limited habitat connectivity between the records and site due to habitat fragmentation.

### Extended Phase 1 Field Survey

#### Overview

- 3.3 The results of the day-time inspection are summarised in the following sections.

#### Hard Standing

- 3.4 The site footprint is dominated along the northern and western extent by stone aggregate that is utilised as a storage area for vehicles (Photo 1), and is sparsely colonised by ruderal species such as Hoary Mustard *Hirschfeldia incana*, Lesser Trefoil *Trifolium dubium* and Smooth Hawk's-beard *Crepis capillaris*.

#### Neutral Grassland

- 3.5 A raised plateau was located at the eastern extent of site, which possessed a prefabricated building towards its southern extent. The northern extent of the plateau (located north of the building) was approximately 650m<sup>2</sup>; whilst the southern extent (located south of the building) was approximately 130m<sup>2</sup>. The substrate that the plateau was constructed from appeared to be comprised of crushed stone aggregate that was free draining with a shallow layer earth. From viewing historic online aerial images<sup>1</sup> it

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<sup>1</sup> Google Earth Pro

was evident that the plateau was previously covered by scrub up until 2022/2023 and that the vegetation had been cleared/felled in the last 1-2years and left to regenerate and re-colonise. The grassland and habitats were not considered to meet the Post-Industrial Land SINC criteria<sup>2</sup> due to limited species composition and the scrub and invasive succession/colonisation.

- 3.6 The northern extent of the eastern plateau (and a smaller area located to the south of the plateau) had been colonised by species poor neutral grassland that was dominated by Creeping Bent *Agrostis stolonifera* and Yorkshire Fog *Holcus lanatus* (Photo 2), with smaller areas of Field Horsetail *Equisetum arvense*. The grassland also possessed less frequent species such as Hop Trefoil *Trifolium campestre*, Bird's Foot Trefoil *Lotus corniculatus*, Common Vetch *Vicia sativa*, Plantain *Plantago lanceolata* and Great Mullein *Verbascum Thapsus* (See Appendix IV for species list and relative abundance).

#### *Tall Ruderal Habitat & Bracken*

- 3.7 The slopes of the plateau were generally stoney in composition and had been colonised by Tall Ruderal habitat that was dominated by Horary Mustard (Photo 3) with less frequent Smooth Sow-thistle *Sonchus oleraceus*. Small areas of Bracken *Pteridium aquilinum* were also evident around the margins of site (Photo 4) and were considered likely to be present when the plateau was historically covered in scrub.

#### *Scrub & Treeline*

- 3.8 Areas of remnant scrub were located around the perimeter prefabricated of the prefabricated building located on the plateau (Photo 5) and were comprised of a diverse range of species including Sycamore *Acer pseudoplatanus*, Ash *Fraxinus excelsior*, Bramble *Rubus fruticosus* and Buddleia *Buddleja davidii*, with Willow *Salix sp.* and Aspen *Populus tremula* saplings also present. A small treeline of immature Aspen was located on the eastern boundary of site opposite the plateau (Photo 6).

#### *Pernicious Weeds*

- 3.9 Japanese Knotweed was evident within the grassland onsite and appeared to be spreading along the plateau (Photo 7). Japanese Knotweed is invasive and listed under Schedule 9, Section 14 of the Wildlife and Countryside Act 1981 (as amended), making it is an offence "to plant or otherwise encourage" their growth. Japanese Knotweed is classed as 'controlled waste' and as such it and any soil containing rhizomes must be disposed of safely at a licensed landfill site according to the Environmental Protection Act (Duty of Care) Regulations 1991.

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<sup>2</sup> Guidelines for the selection of wildlife sites in South Wales.

*Photo 1: Stone aggregate storage yard (view looking south).*



*Photo 2: Species poor neutral grassland on plateau (view looking north east).*





*Photo 3: Tall ruderal habitat on stoney northern extent of plateau (view looking east).*



*Photo 4: Bracken and scrub located adjacent to northern elevation of prefabricated building (view looking south).*





*Photo 5: Scrub located adjacent to the eastern elevation of prefabricated building (view looking west).*



*Photo 6: Immature Aspen treeline along eastern boundary of site.*





*Photo 7: Japanese Knotweed located in plateau grassland.*



## Fauna

3.10 In the course of the survey, a search for field signs of protected or notable species was undertaken and the potential of the habitats to support these species considered. In the context of this report notable species were those considered to meet any of the following criteria:

- Species protected by British or International law;
- Environment (Wales) Act Section 7 Priority Species or local BAP species;
- Nationally rare or nationally scarce species;
- Species of Conservation Concern (e.g. JNCC Red List, RSPB/BTO Red or Amber Lists)

### *Bats - Building Survey*

3.11 A prefabricated building was located at the southern extent of the eastern plateau (Photo 8). A detailed internal and external survey of the structure was not conducted as the building is to remain undisturbed by the proposed development and is outside the site footprint. However, the simple design that was comprised of a predominantly corrugated metal upper design with a lower rendered wall meant there was minimal potential bat roosting features even with Ivy Growth evident on the western elevation. The species will not be considered further in this report.

*Photo 8: Northern elevation of prefabricated building (view looking south).*





*Birds*

3.12 The stone aggregate yard was not a suitable habitat for ground nesting birds due to the disturbance round the site; whilst the grassland was small in nature and not suitable for ground nesting birds. The scrub located around the perimeter of the prefabricated building was considered to be suitable habitat for nesting bird.

*Reptiles*

3.13 The stone aggregate yard was considered to be unsuitable habitat for common reptile species. However, the grassland, tall ruderal habitat and scrub were considered to be potentially suitable to support common reptile species such as Slow-worm *Anguis fragilis*.

3.14 A reptile presence/absence survey undertaken between May and June 2024 identified no evidence of common reptile species. However, Common Toad was identified during most of the surveys beneath the refugia (see table 1 below for details).

**Table 1. Results of reptile presence/ absence surveys**

Visit	Date	Time	Temp (°C)	Weather	Slow Worm			Notes (other reptile and amphibian species)
					Female	Male	Juvenile	
	09/05/2024	Refugia deployed						
1	20/05/2024	12.00pm	17.0	Sunshine and cloud	0	0	0	2 Common Toads
2	22/05/2024	13.00pm	17.0	Sunshine and cloud	0	0	0	
3	24/05/2024	13.00am	16.0	Cloudy	0	0	0	
4	29/05/2024	13.00pm	16.0	Cloudy	0	0	0	2 Common Toads
5	03/06/2024	14.00pm	15.0	Sunshine and cloud	0	0	0	
6	05/06/2024	13.00pm	16.0	Sunshine and cloud	0	0	0	2 Common Toads
7	07/06/2024	13.00pm	17.0	Sunshine	0	0	0	2 Common Toads
<b>Total</b>					<b>0</b>	<b>0</b>	<b>0</b>	

## 4.0 LEGISLATION, POLICIES AND PLANS

4.1 The following international, national and local legislation and planning policies relating to nature conservation and biodiversity are considered of relevance to the proposed development.

### **National Planning Policy**

4.2 In terms of planning policy, a number of over-arching policies are of relevance not least of which are those described within Planning Policy Wales (PPW), which sets out land use planning policies of the Welsh Assembly Government with Chapter 6 dealing with Distinctive and Natural Places.

### **Environment (Wales) Act, 2016**

4.3 Part 1 of the Environment Act Wales' came into force in May 2016 and sets out the approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act.

#### *Section 6 - Biodiversity and resilience of ecosystems duty*

4.4 Section 6 of the Act places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'.

#### *Section 7 - Biodiversity lists and duty to take steps to maintain and enhance biodiversity*

4.5 This section lists living organisms and types of habitat in Wales which are considered of key significance to maintaining and enhancing biodiversity in relation to Wales. The Welsh Ministers are required to take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.

### **Planning Policy Wales (2024)(12<sup>th</sup> Edition)**

4.6 This document set out the land use planning policies of the Welsh Government with Chapter 6 relating to Distinctive and Natural Places and in particular Section 6.4 Biodiversity and Ecological Networks, which states how the planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Addressing the consequences of climate change should be a central part of any measures to conserve biodiversity and the resilience of ecosystems.

- 4.7 The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals.
- 4.8 The planning system must help to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Addressing the consequences of climate change should be a central part of any measures to conserve biodiversity and the resilience of ecosystems.
- 4.9 In fulfilling this duty, planning authorities must have regard to the list of habitats and species of principal importance for Wales, published under Section 7 of the Environment (Wales) Act 2016.
- 4.10 The broad framework for implementing the Section 6 Duty and building resilience through the planning system includes addressing:
- Diversity between and within ecosystems;
  - Extent and scale of ecosystems;
  - Condition between and within ecosystems;
  - Connectivity of ecosystems including their structure and functioning; and
  - Adaptability to change of ecosystems.

#### **Future Wales the National Plan 2040**

- 4.11 Future Wales – the National Plan 2040 is our national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

#### *Policy 9 – Resilient Ecological Networks and Green Infrastructure*

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

- 4.12 Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment
- 4.13 Planning Policy Wales and S6 duty requires the Local Planning Authority to adopt a stepwise approach when assessing planning applications, and as such Carmarthen shire Couty Council have to maintain and enhance biodiversity and builds resilient ecological networks. This approach also details how adverse environmental effects of development are first avoided, then minimised, mitigated and, as a last resort, compensated. The stepwise approach will require the Council to reach a judgement of the biodiversity on the proposed development site i.e. important species and habitats; having regard to legal protections, statutory and non-statutory designations and all the other relevant considerations to determine ecological value.

### **Local Planning Policy**

#### ***Carmarthenshire Local Development Plan***

- 4.7 The Carmarthenshire Local Development Plan (LDP) was adopted on the 10th December 2014. The LDP sets out the spatial vision for the future of Carmarthenshire (excluding that area within the Brecon Beacons national Park) and a framework for the distribution and delivery of growth and development. It sets out land-use planning policies and proposals which are used in the determination of planning applications and in guiding future opportunities for investment and growth. These policies include land-use allocations for different types of development (i.e. housing, employment, retailing, education, open space etc.) as well as criteria for assessing individual proposals. The LDP, will guide development up to 2021, and will be monitored in accordance with the monitoring framework and periodically reviewed.

#### **Key Policies:**

##### ***Policy EQ4 Biodiversity***

*Proposals for development which have an adverse impact on priority species, habitats and features of recognised principal importance to the conservation of biodiversity and nature conservation, (namely those protected by Section 42 of the Natural Environment and Rural Communities (NERC) Act 2006 and UK*

*and Local BAP habitats and species and other than sites and species protected under European or UK legislation) will not be permitted, except where it can be demonstrated that:*

- a. The impacts can be satisfactorily mitigated, acceptably minimised or appropriately managed to include net enhancements;*
- b. There are exceptional circumstances where the reasons for the development or land use change clearly outweighs the need to safeguard the biodiversity and nature conservation interests of the site and where alternative habitat provision can be made in order to maintain and enhance local biodiversity.*

***Policy EQ5 Corridors, Networks and Features of Distinctiveness***

*Proposals for development which would not adversely affect those features which contribute local distinctiveness/qualities of the County, and to the management and/or development of ecological networks (wildlife corridor networks), accessible green corridors and their continuity and integrity will be permitted. Proposals which include provision for the retention and appropriate management of such features will be supported (provided they conform to the policies and proposals of this Plan).*

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

- 5.1 The combination of desk and field surveys undertaken at the site identified the footprint as being dominated by a hard aggregate storage yard with sparse tall ruderal vegetation to the north and west; whilst a small raised plateau of disturbed land was located to the south and east of site that possessed a mosaic of neutral grassland, tall ruderal habitat and scrub that surrounded a prefabricated building. The footprint was surrounded by the wider Dyfed Steels site to the north and west; whilst the A4138 and associated scrub/treeline was located to the south and east.
- 5.2 The proposed development works will result in the loss of the stone aggregate yard and potentially the majority of the plateau containing the neutral grassland, tall ruderal and scrub habitats (Appendix V). The stone aggregate yard was considered to be of negligible ecological interest. The grassland, tall ruderal and scrub were considered to be limited botanical diversity due to the recent colonising of the plateau after scrub clearance, whilst the resilience of these habitats is considered to be short term with the presence Japanese Knotweed colonising the grassland on the plateau. The plateau habitats were considered to be of ecological importance on a site/local context and potentially utilised by nesting birds (scrub), foraging and commuting mammals and small numbers of amphibians.
- 5.3 To offset the loss of the grassland and tall ruderal habitat it is recommended that the new industrial building's Sustainable drainage systems (SuDS) is allowed to naturally colonise with native species from adjacent grassland verges (A4138). Alternatively to provide a more diverse botanical composition onsite the SuDS can be seeded with either a general purposed wildflower seed mix or a wildflower mix for wetlands if regular inundation by water is expected within the SuDS.

### *Birds*

- 5.4 The small amounts of scrub located around the offsite prefabricate building was the only habitat considered to be suitable nesting habitat for birds, and as such the clearance of the feature will need to be conducted outside the bird nesting season (March-September) or preceded by a visual check. All wild birds are protected against killing and injury under the Wildlife and Countryside Act 1981 (as amended) and their nests against damage or destruction whilst in use or being built.

### *Reptiles*

- 5.5 The grassland, tall ruderal habitat and marginal scrub were considered to be suitable habitat for common reptile species. However, a reptile presence/absence survey conducted between May and June 2024 identified no evidence of reptiles onsite. However, their presence in the adjacent offsite habitats such as the margins of the A4138 (on the eastern boundary of site) could not be precluded. It is recommended

that if any vegetation clearance is required a precautionary sensitive directional vegetation clearance is adopted to the eastern boundary with any loose refugia removed by hand. Any amphibians identified during refugia searches will be released in the offsite marginal habitats located north of site. All common reptiles are protected against intentional killing or injury under the Wildlife and Countryside Act 1981 (as amended).

### *Ecological Enhancement*

- 5.6 To enhance the resources for nesting birds on the warehouse it is recommended that 6 No. Swift Boxes are erected on the northern and eastern elevations of the industrial building; whilst 6 No. Bat Boxes are erected on the southern and eastern elevation (Appendix VI). It is also recommended that any soft landscaping include species of local provenance and benefit to wildlife.

## REFERENCES

Bat Conservation Trust (2023). *Bat Surveys – Good Practice Guidelines*. Fourth Edition. Bat Conservation Trust, London.

EUROPA. (2007). *Guidance document on the strict protection of animal species of Community interest under the Habitats Directive 92/43/EEC; Final version, February 2007*.  
[http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index\\_en.htm](http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm)

Mitchell-Jones, A.J, & McLeish, A.P. Ed., (2004), 3rd Edition Bat Workers' Manual, 178 pages b/w photos, softback, ISBN 1 86107 558 8



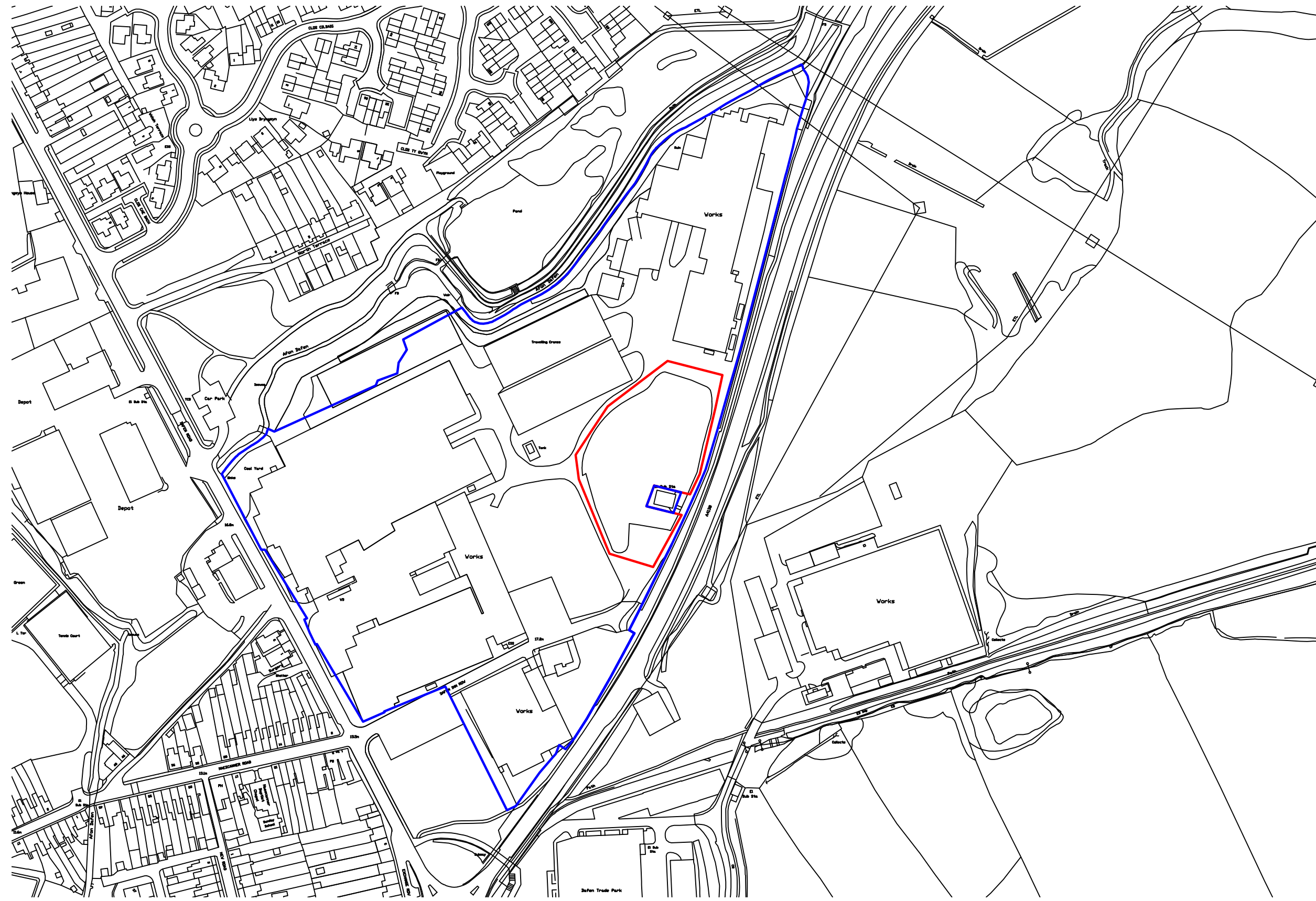
## APPENDIX I: SITE LOCATION PLAN

# SITE LOCATION PLAN

Ordnance Survey (c) Crown Copyright 2020. All rights reserved. Licence number 100022432



THIS SCHEME IS SUBJECT TO LOCAL PLANNING AND ALL OTHER NECESSARY CONSENTS. ALL DIMENSIONS, SITE LEVELS AND AREAS WHERE GIVEN ARE APPROXIMATE AND SUBJECT TO SITE SURVEY UNLESS STATED OTHERWISE. ALL DIMENSIONS MUST BE CHECKED ON SITE. DO NOT SCALE OFF THIS DRAWING. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT CONSULTANTS' AND/OR SPECIALISTS' DRAWINGS OR DOCUMENTS. 'SAURO ARCHITECTURAL DESIGN' MUST BE NOTIFIED OF ANY VARIATIONS OR DISCREPANCIES BEFORE THE AFFECTED WORK COMMENCES. ALL QUERIES RELATING TO DESIGN OF FOUNDATIONS, FLOOR SLABS AND ANY OTHER STRUCTURAL ELEMENTS ARE TO BE REFERRED TO THE STRUCTURAL ENGINEER FOR CLARIFICATION.



- Legend**
- Planning application boundary
  - Ownership boundary

Red line area: 7173.5m<sup>2</sup>

Rev.	Description	By	Date

## PLANNING



SAURO ARCHITECTURAL DESIGN LTD  
 9 ELLISTON TERRACE,  
 CARMARTHEN, SA31 1HA  
 Tel: (01267) 233 684  
 Email: design@sauro.co.uk  
 © Drawing Copyright Sauro Architectural Design Ltd

Client  
**Dyfed Steel Ltd**

Project Title  
**Proposed Industrial Building @**

Tube Works/Ind Est, Dafen, Llanelli  
 SA14 8NS

Drawing Title  
**Site Location Plan**

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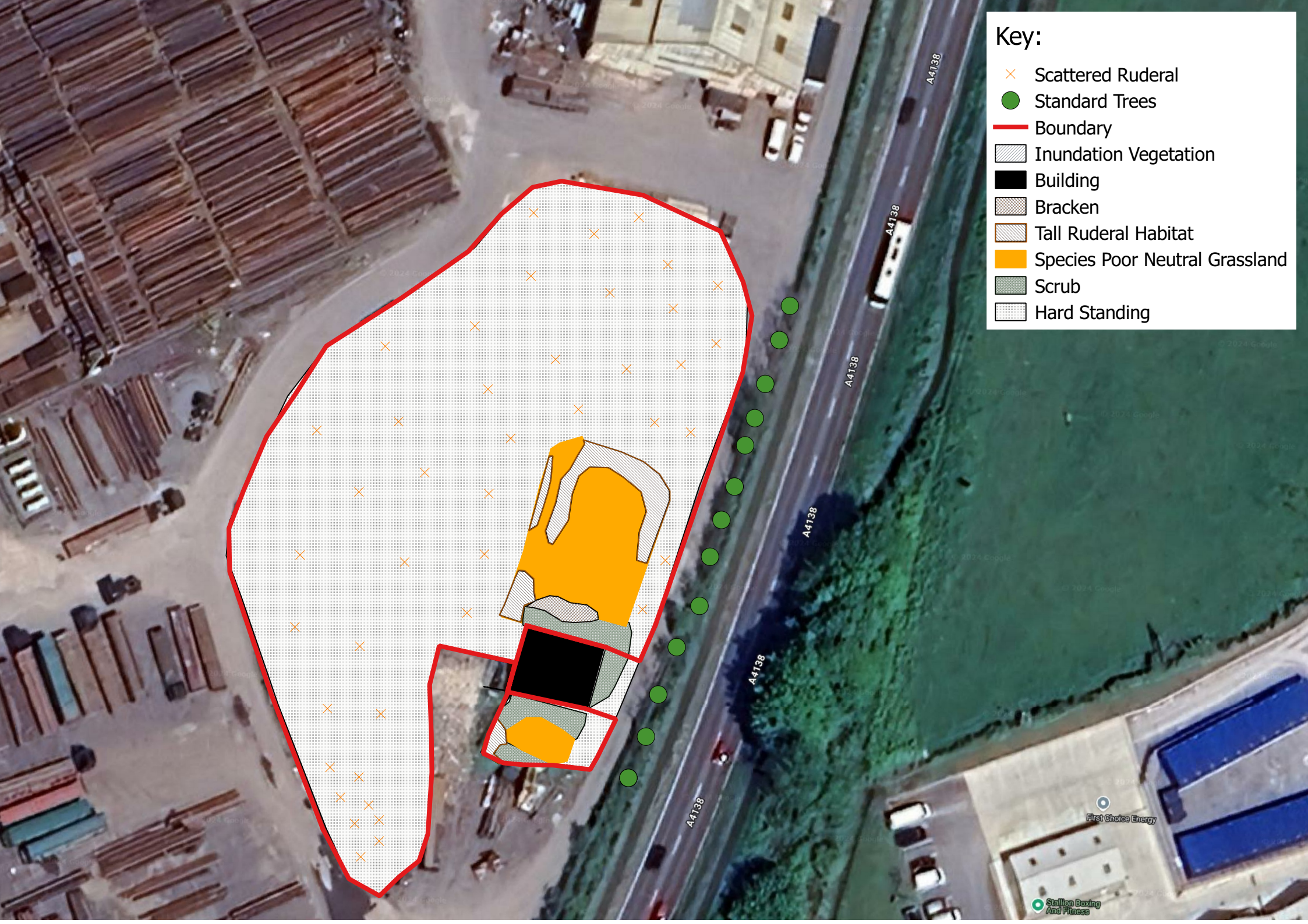
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**Site Location Plan**  
 1:2500

## APPENDIX II: PHASE 1 MAP





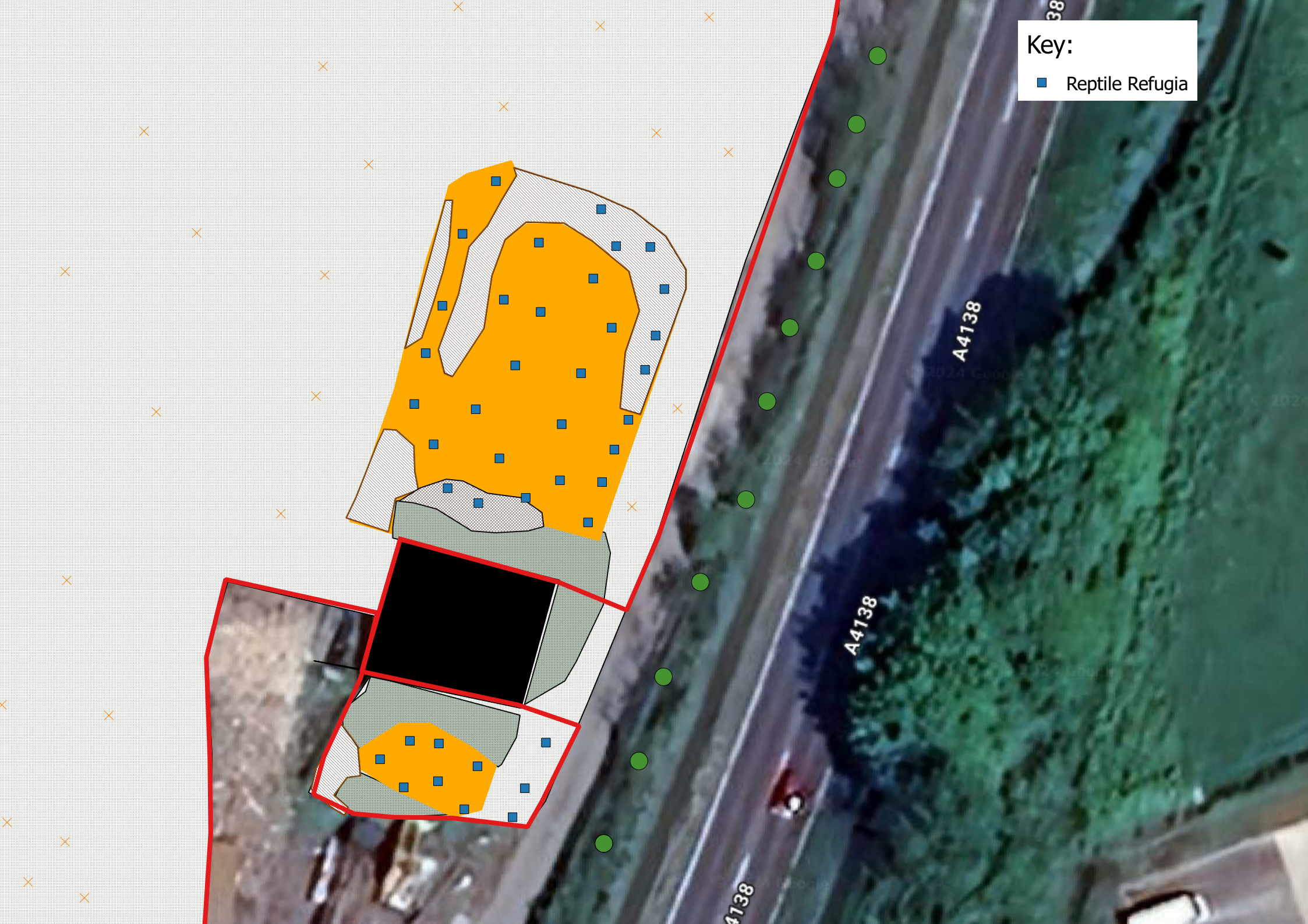
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- × Scattered Ruderal
- Standard Trees
- Boundary
- ▨ Inundation Vegetation
- Building
- ▩ Bracken
- ▨ Tall Ruderal Habitat
- Species Poor Neutral Grassland
- ▨ Scrub
- ▨ Hard Standing

## APPENDIX III – REPTILE REFUGIA PLAN



Key:  
■ Reptile Refugia



#### APPENDIX IV - REPRESENTATIVE SPECIES LIST

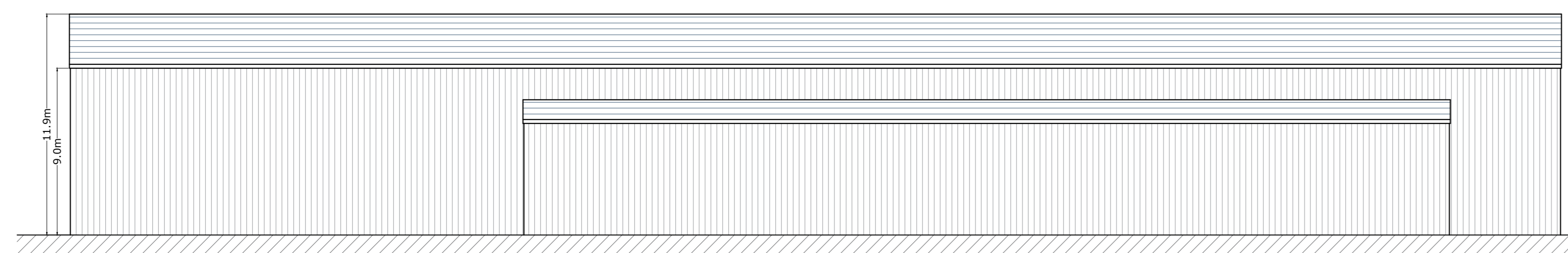
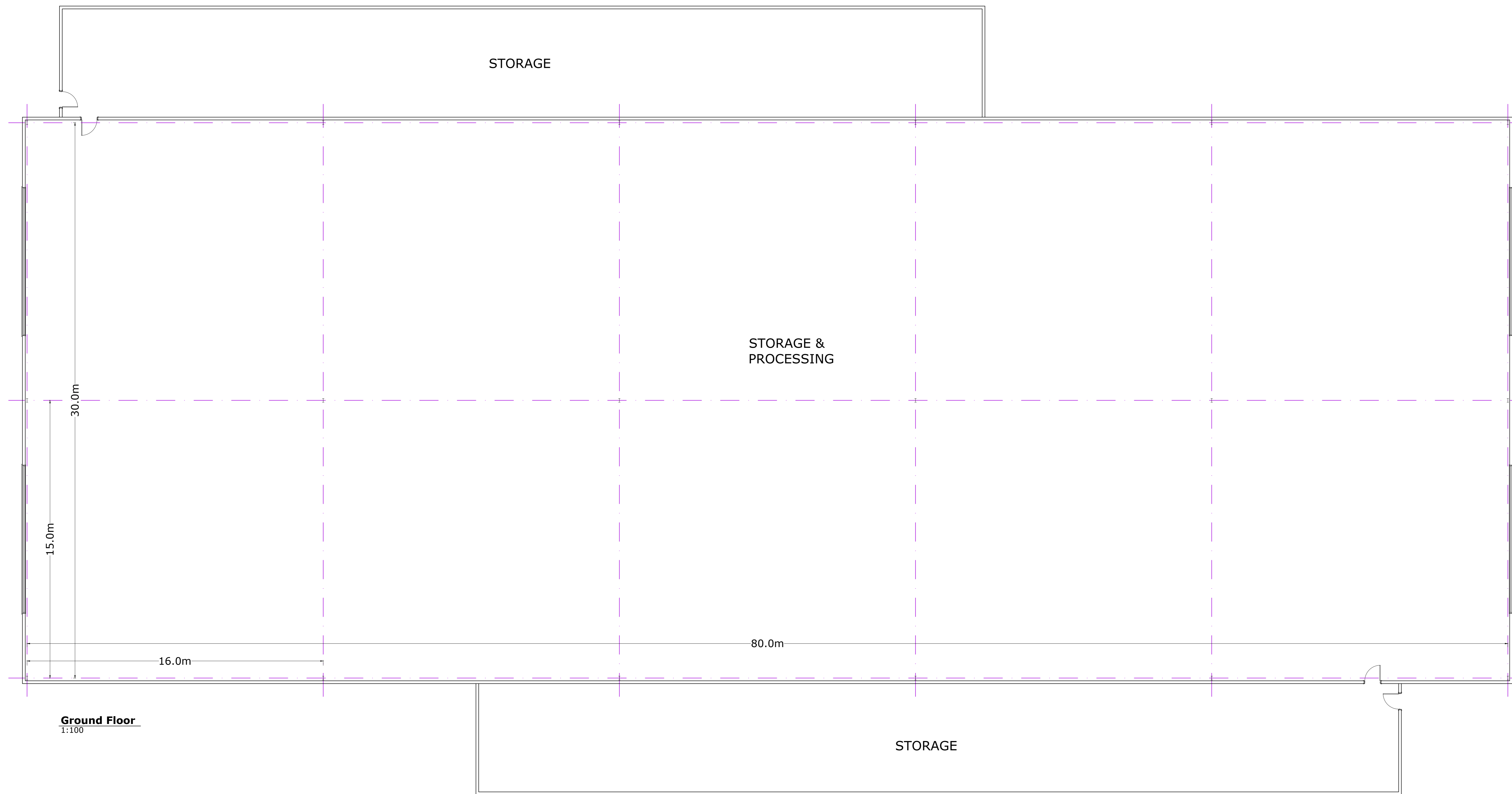
Species	Relative Abundance
Ribbed Melilot	F
Smooth Sow Thistle	F
Oxeye Daisy	R
Soft Brome	O
Yorkshire Fog	A
Creeping Bent	A
Bird's-foot Trefoil	O
Hop Trefoil	O
Cock's Foot	F
Great Mullein	O
Red Clover	O
Field Horsetail	F
Common Vetch	F
Hoary Mustard	A
Smooth Hawk's-beard	O
Lesser Trefoil	O
Red Campion	O
Great Plantain	F
Foxglove	R
Bittersweet	R
Greater Celandine	R
Bread Wheat	R
Common Poppy	O

## APPENDIX V: PROPOSED DEVELOPMENT PLAN

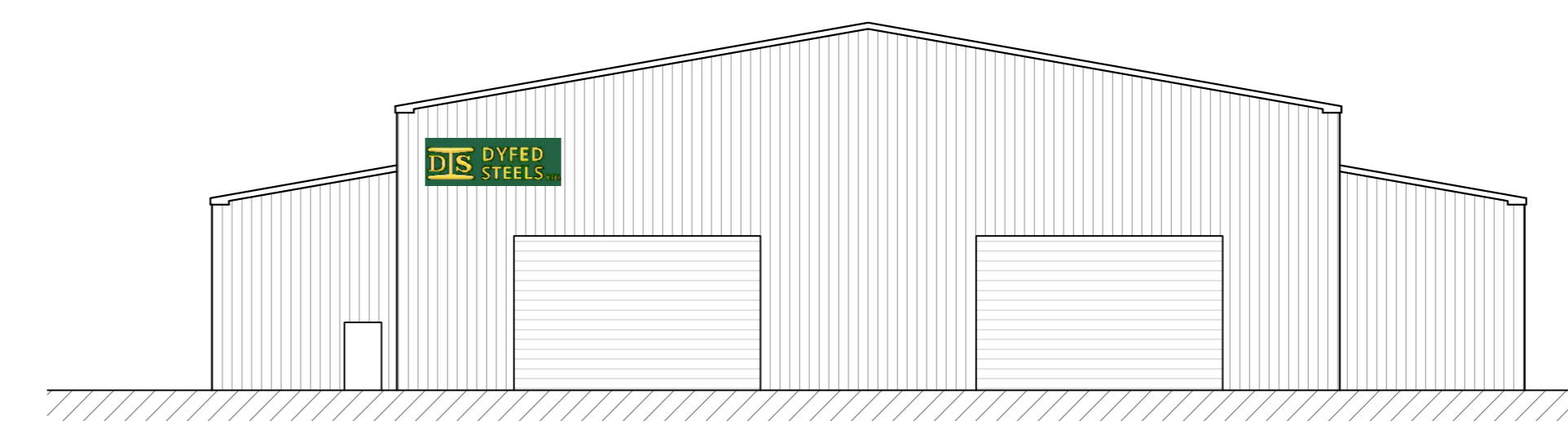


# PROPOSED FLOOR PLAN & ELEVATIONS

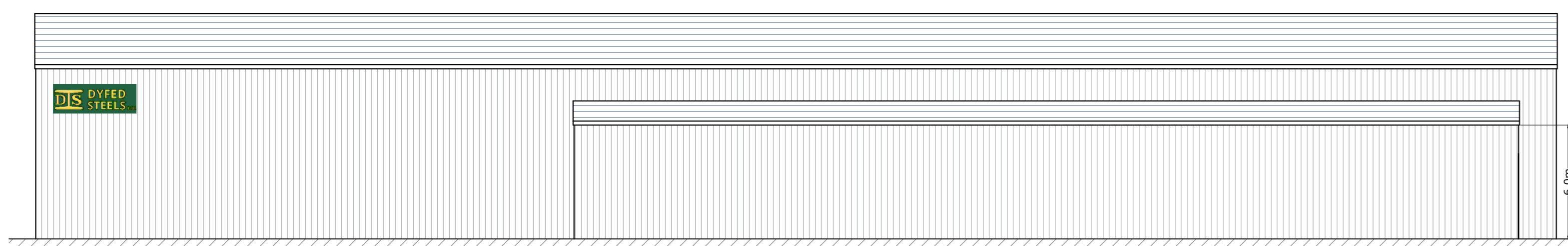
THIS SCHEME IS SUBJECT TO LOCAL PLANNING AND ALL OTHER NECESSARY CONSENTS. ALL DIMENSIONS, SITE LEVELS AND AREAS WHERE GIVEN ARE APPROXIMATE AND SUBJECT TO SITE SURVEY UNLESS STATED OTHERWISE. ALL DIMENSIONS MUST BE CHECKED ON SITE. DO NOT SCALE OFF THIS DRAWING. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT CONSULTANTS' AND/OR SPECIALISTS' DRAWINGS OR DOCUMENTS. SAURO ARCHITECTURAL DESIGN MUST BE NOTIFIED OF ANY VARIATIONS OR DISCREPANCIES BEFORE THE AFFECTED WORK COMMENCES. ALL QUERIES RELATING TO DESIGN OF FOUNDATIONS, FLOOR SLABS AND ANY OTHER STRUCTURAL ELEMENTS ARE TO BE REFERRED TO THE STRUCTURAL ENGINEER FOR CLARIFICATION.



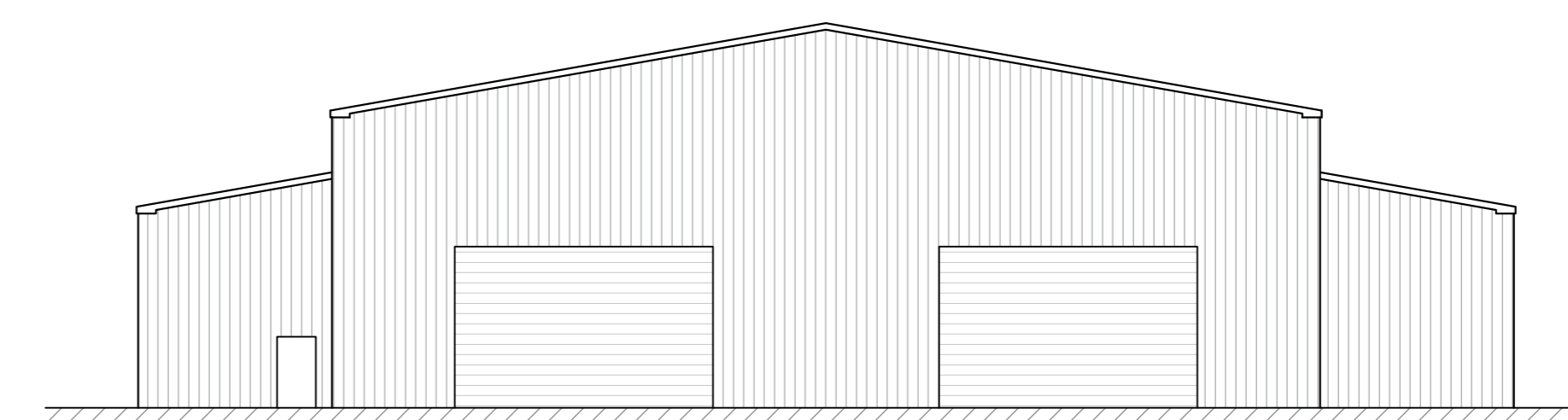
**Front Elevation**  
1:200



**Side Elevation**  
1:200



**Rear Elevation**  
1:200



**Side Elevation**  
1:200

Rev.	Description	By	Date
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**PLANNING**



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Client  
**Dyfed Steel Ltd**

Project Title  
**Proposed Industrial Building @**  
Tube Works/Ind Est, Dafen, Uanelli  
SA14 8NS

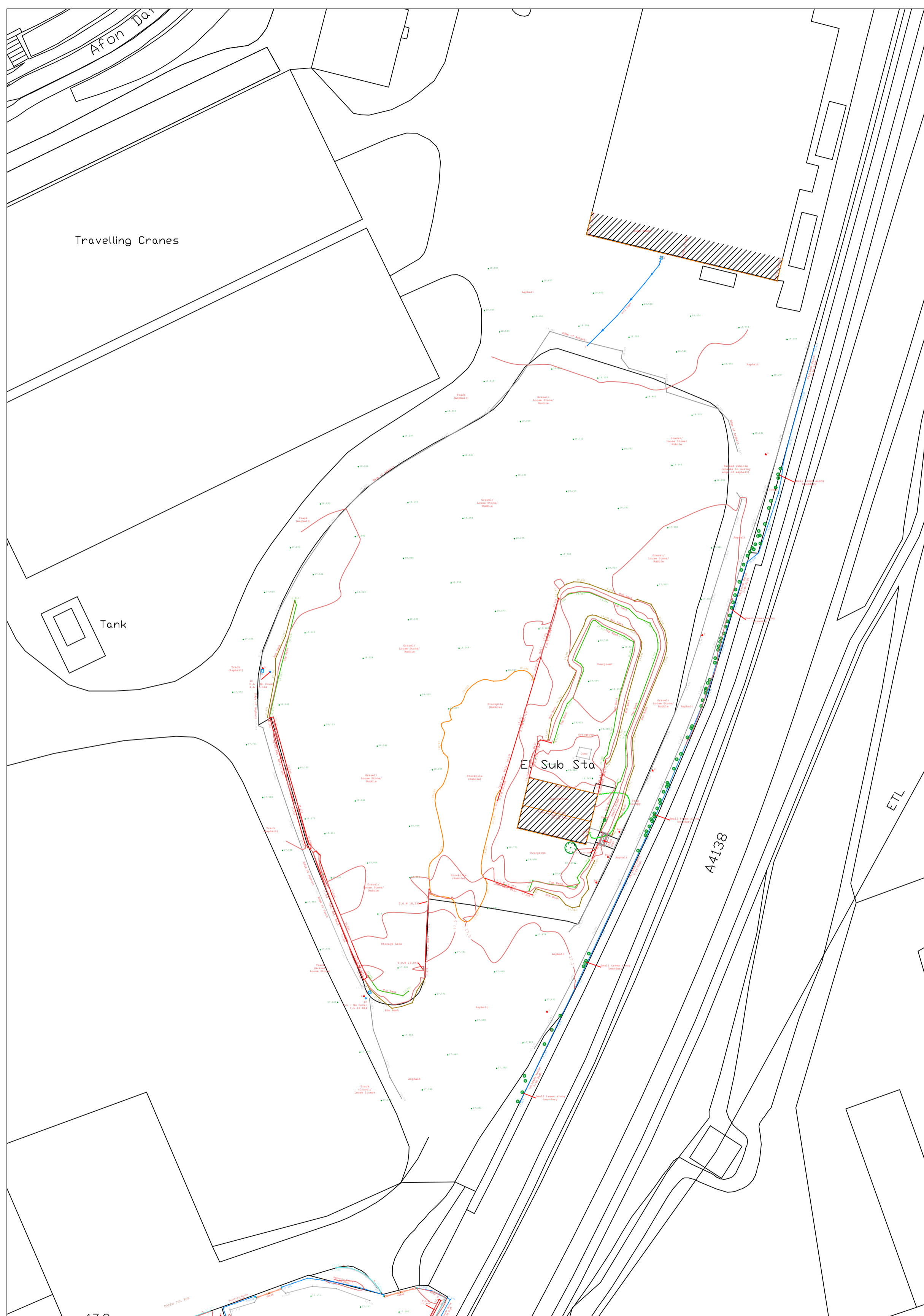
Drawing Title  
**Proposed Floor Plan & Elevations**

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Date	Drawn by	Checked by
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Job No.	Drawing No.	Revision
<b>1120a</b>	<b>01</b>	

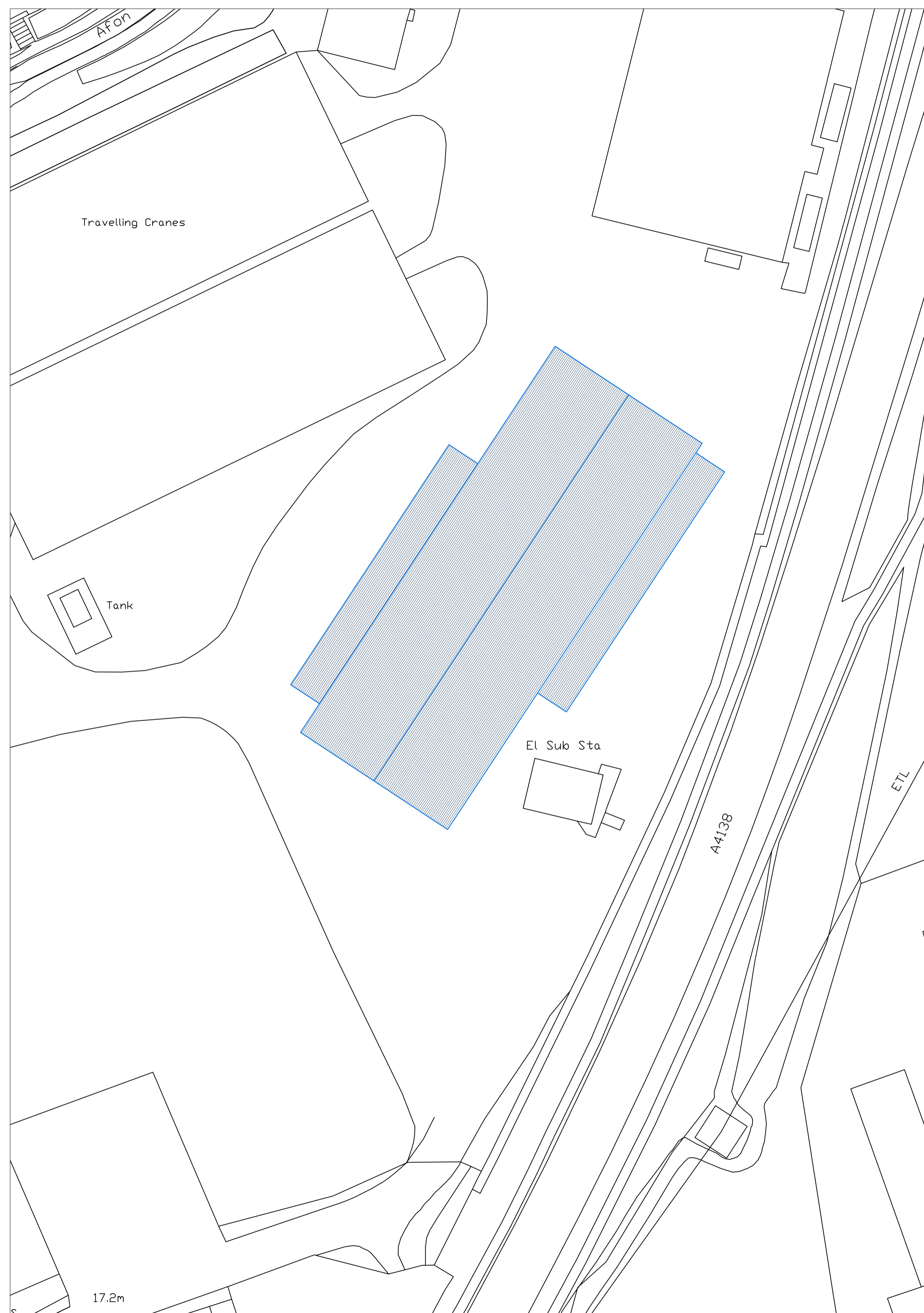


# EXISTING & PROPOSED SITE PLANS

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**Existing Site Plan**  
1:500



**Proposed Site Plan**  
1:500

Rev.	Description	By	Date

**PLANNING**



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Client  
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Project Title  
**Proposed Industrial Building @**

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SA14 8NS

Drawing Title  
**Existing & Proposed Site Plans**

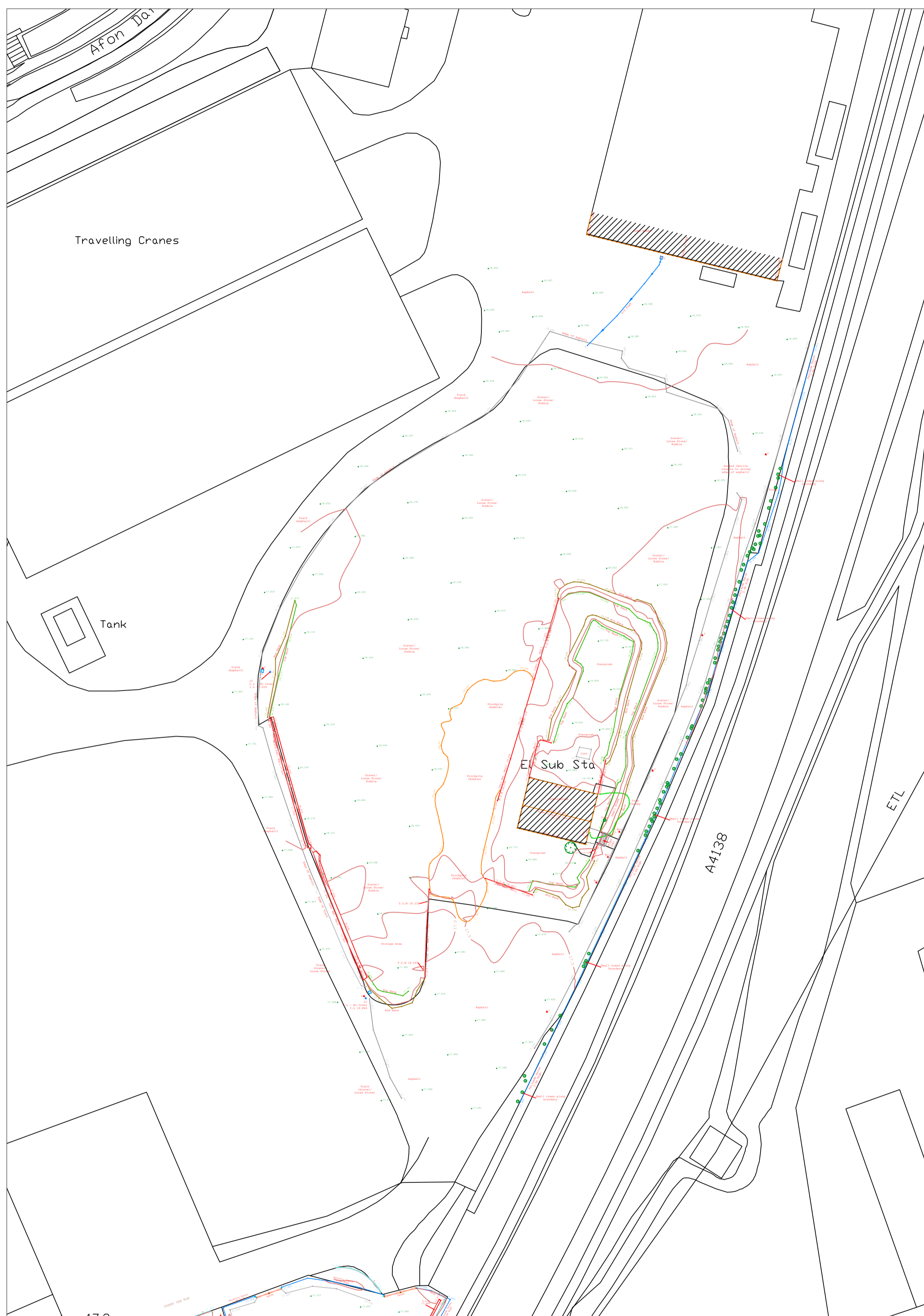
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Date	Drawn by	Checked by
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Job No.	Drawing No.	Revision
<b>1120a</b>	<b>02</b>	



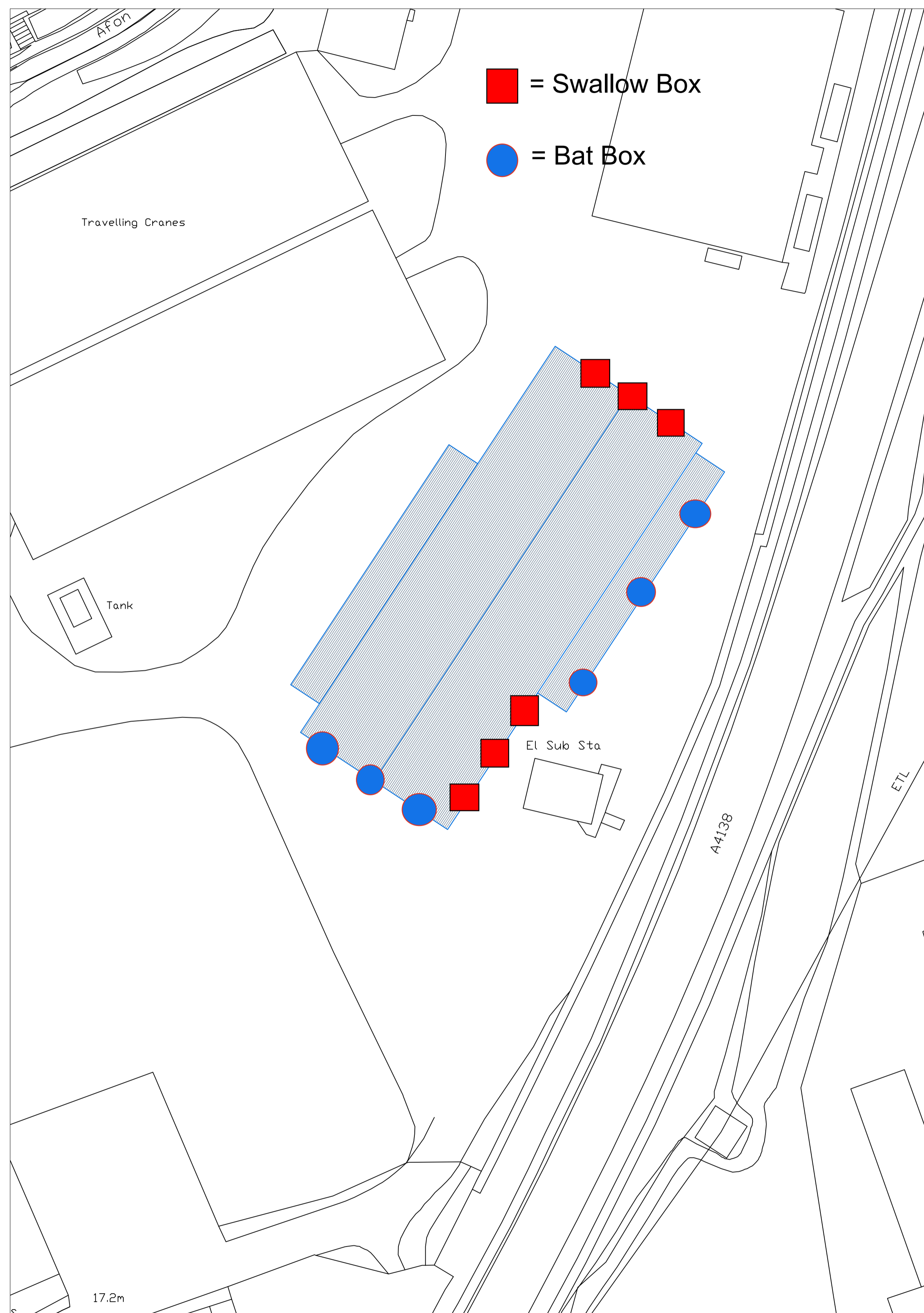
## APPENDIX VI: BIODIVERSITY ENHANCEMENT PLAN



**EXISTING & PROPOSED SITE PLANS**



**Existing Site Plan**  
1:500



**Proposed Site Plan**  
1:500

- = Swallow Box
- = Bat Box



Client <b>Dyfed Steel Ltd</b>		
Project Title <b>Proposed Industrial Building @</b>		
Tube Works/Ind Est, Dafen, Llanelli SA14 8NS		
Drawing Title <b>Existing &amp; Proposed Site Plans</b>		
Scale <b>1:500</b>	Sheet Size <b>A1</b>	
Date <b>23/04/2024</b>	Drawn by <b>05</b>	Checked by
Job No. <b>1120a</b>	Drawing No. <b>02</b>	Revision