

PLANNING, DESIGN & ACCESS STATEMENT

New Industrial Unit, Dyfed Steels

September, 2024



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Description of development:

New industrial units (Use Class B2 - general industrial) and associated works.

Location:

Dyfed Steels, Maescanner Road, Dafen, Llanelli, SA14 8NS.

Date:

September, 2024

Asbri Project ref:

S23.226

Client:

Dyfed Steels Ltd



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Date	September, 2024	September, 2024
Revision	-	-

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INTRODUCTION

1.1 The purpose of a Planning, Design & Access Statement (PDAS) is to provide a clear and logical document to demonstrate and explain the various facets of design and access in relation to the site and to appraise the proposed development against relevant planning policies. It also presents the details of a planning application in a way that can be read both by professionals and the public.

1.2 The diagram (right), extracted from Chapter 3 of Planning Policy Wales 12, summarises the five objectives of good design that should be taken into account when preparing a PDAS. The circular nature of the diagram represents the equal weightings that need to be given to each of the 5 Objectives of Good Design: Access; Movement; Character; Environmental Sustainability and Community Safety. The submitted Design and Access Statement adheres to guidance embodied in the Welsh Government publication, Design and Access Statements in Wales, published in June 2017.

1.4 The statement is subdivided into nine sections, commencing with a brief overview of the site context and analysis in Section 2. Section 3 provides the vision and brief of the proposal. Section 4 interprets and applies the context of the brief and vision for the site, whilst section 5 summarises how the design has evolved over time. Section 6 reviews planning policy. Section 7 sets out the proposal, explores the relevant design and access facets associated with the application and provides a response to planning policy. Section 8 comprises a planning appraisal. The document then concludes, under section 9.

1.5 This PDAS has been prepared on behalf of Dyfed Steels Ltd, to accompany a full planning application for the proposed development of a new industrial unit (Use Class B2 - general industrial), and associated works at Dyfed Steels, Maescanner Road, Dafen, Llanelli, SA14 8NS.



Document	Prepared by
Application Form	Asbri Planning
PDAS	Asbri Planning
Coal Mining Risk Assessment	Integral Geotechnique
Proposed Drainage Strategy	CB3 Consult
Preliminary Ecological Appraisal	Bay Ecology
Soft Landscape Design	Stiwdio Owens
Green Infrastructure Statement	Stiwdio Owens
Noise Impact Assessment	Acoustic Consultants
Desk Study Report	Integral Geotechnique
Soil Infiltration Testing Report	Integral Geotechnique
Topographical Survey	Davies Land Surveyors
Transport Statement	Acstro
Tree Report	ArbTS

Drawing	Prepared by
Site Location Plan 1120.LP01b	Sauro Architectural Design
Proposed Plans 1120a.01	Sauro Architectural Design
Site Plans 1120a.02	Sauro Architectural Design

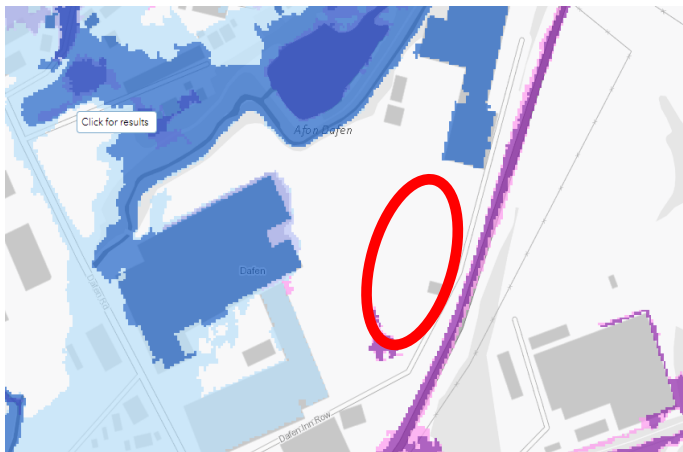
SITE IN LOCAL CONTEXT



SITE CONTEXT AND ANALYSIS



Natural Resources Wales Development Advice Map



Natural Resources Wales Flood Map for Planning

Overview

2.1 This section sets out the site's general location and provides a brief description of the application site and its immediate surroundings.

General Location and Surroundings

2.2 The application site is located within Dafen, a village situated in the east of Llanelli. The subject 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.

2.3 The application site is situated within the operational curtilage of the Dyfed Steels site and can be accessed from the main entrance off Dafen Road (via an internal route through the site) or alternatively from Dafen Inn Row to the south. The site is positioned in the east of the Dyfed Steels site, a short distance from the A4138. An electrical substation immediately adjoins the site to the east.

2.4 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.

Site Features

2.5 The site comprises an area of hardstanding, which is currently used for storage. With regard to the topography of the site, it is generally flat.

Site Context

2.6 The TAN 15 Development Advice Map indicates the development parcels are located within Flood Zone A. The forthcoming Flood Map for Planning indicates the site is predominantly unconstrained by flood risk with only a minor extent of Surface Water Flood Zone 2 found to the south of the new industrial unit development extent.

2.7 A review of CADW's map identified no listed buildings or

scheduled ancient monuments within or adjoining the site.

2.8 The Coal Authority online mapping indicates the subject site is located within the Coal Mining Reporting Area and may likely be situated within the Development High Risk Area. This application is therefore supported by a Coal Mining Risk Assessment.

2.9 A review of Carmarthenshire Local Development Plan (LDP) proposals map indicates the subject site is situated within the defined settlement boundary. In addition to the site's location within the development limits, the subject site is allocated for employment use and represents an existing employment area.

Access

2.10 The application site is accessed from the main entrance to the Dyfed Steels Site off Dafen Road (via an internal route through the site) or alternatively from Dafen Inn Row to the south. The existing vehicle routes within the site will appropriately serve the new employment development. As highlighted above the site can also be accessed via Dafen Inn Row, which may provide an entrance for employees in private vehicles to access parking. An existing employee car park is situated to the south of the site, adjoining Dafen Inn Row

Planning History

2.13 Asbri Planning have undertaken a review of the Carmarthenshire County Council online planning register, which did not identify any historic planning applications associated with the subject site.

THE VISION AND BRIEF

The Vision

3.1 It is the intention of the applicant to redevelop the site, which is currently an area of hardstanding and is used for storage purposes in association with the wider general industrial use of the Dyfed Steels site, to create a new build industrial unit.

3.2 The location of the site is conducive to the proposed use, as the application site is situated within the existing curtilage of the wider Dyfed Steels site, and benefits from good levels of access.

3.3 The proposal will therefore provide an industrial unit in a sustainable location, making effective use of brownfield land.

The Brief

3.4 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.

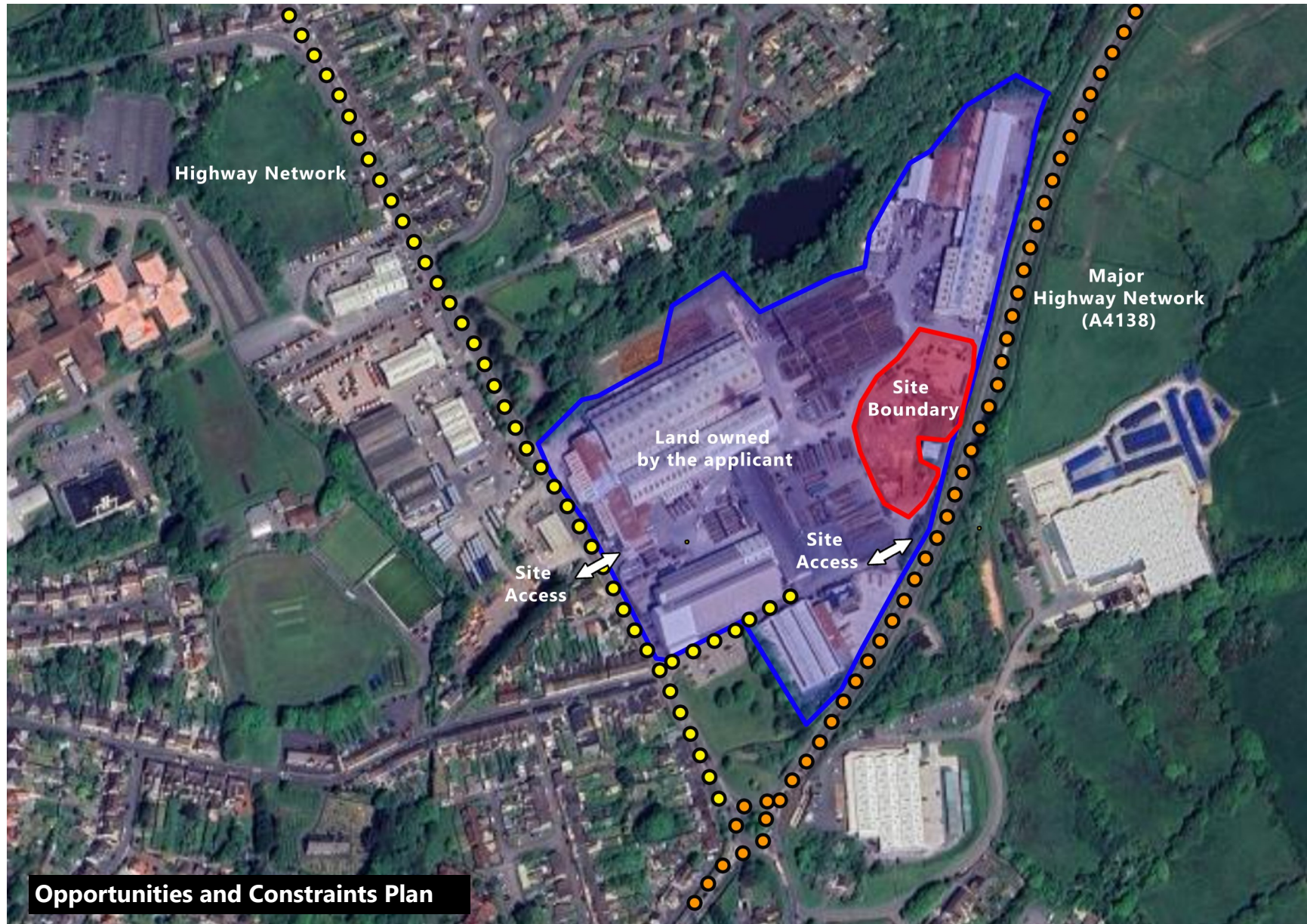
3.5 Dyfed Steels Ltd is a significant employer in Llanelli, operating from two locations and headquartered in Dafen. The firm currently employs approximately 180 members of staff at its head office in Llanelli and has operated in the town for over 45 years, playing an important role in the economy of Llanelli and West Wales. It is envisaged the proposed development will stimulate further economic growth, increasing production capacity and attracting new business opportunities.

3.6 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. Although Dyfed Steels are primarily a steel

stockists, they process approximately 60% of their output. The proposed development therefore responds to the need to expand capacity to meet the demands of an important part of the business. In combination with the forthcoming redevelopment of the nearby former Radnedge unit it is envisaged the proposals will create new job opportunities at Dyfed Steels, an important local employer.

3.7 The proposal therefore seeks to respond to the need for additional employment floorspace, that allow the applicant to expand upon the current operations at the site in order to meet increased customer demand.

OPPORTUNITIES AND CONSTRAINTS



Opportunities and Constraints Plan

INTERPRETATION

4.1 The concept for the development of the site has derived from the following:

- Full site analysis including a full desktop study of the site and its surroundings
- A site visit and general visual assessment of the surrounding area.
- Discussions with the client and a full understanding of the brief and vision of the project, and

4.2 The above steps have presented the key opportunities and constraints for the site, which are outlined below:

Opportunities

Settlement Boundary - the site is wholly within the settlement boundary, where development should be considered acceptable in principle.

Brownfield Land - previously developed land should, wherever possible be used in preference to greenfield sites where it is suitable for development.

Site Ownership - the site is wholly under the ownership of the applicant.

Sustainable Location - the site is considered to be located within a sustainable location and is well connected to the surrounding highway network.

Site Topography - the topography of the site is generally level.

Low Flood Risk - NRW's Flood Map for Planning shows that the site does not lie within a flood zone.

Constraints

Internal access - the proposal will need to be mindful of the internal circulations and movements within the site, to ensure the business operations are not impacted.

Neighbouring site features - the proposal must ensure the neighbouring electrical substation is not impacted by the development.

DESIGN EVOLUTION

Initial Design Layout

5.1 This section of the PDAS describes the design evolution of the scheme in a way that can be read both by professionals and the public.

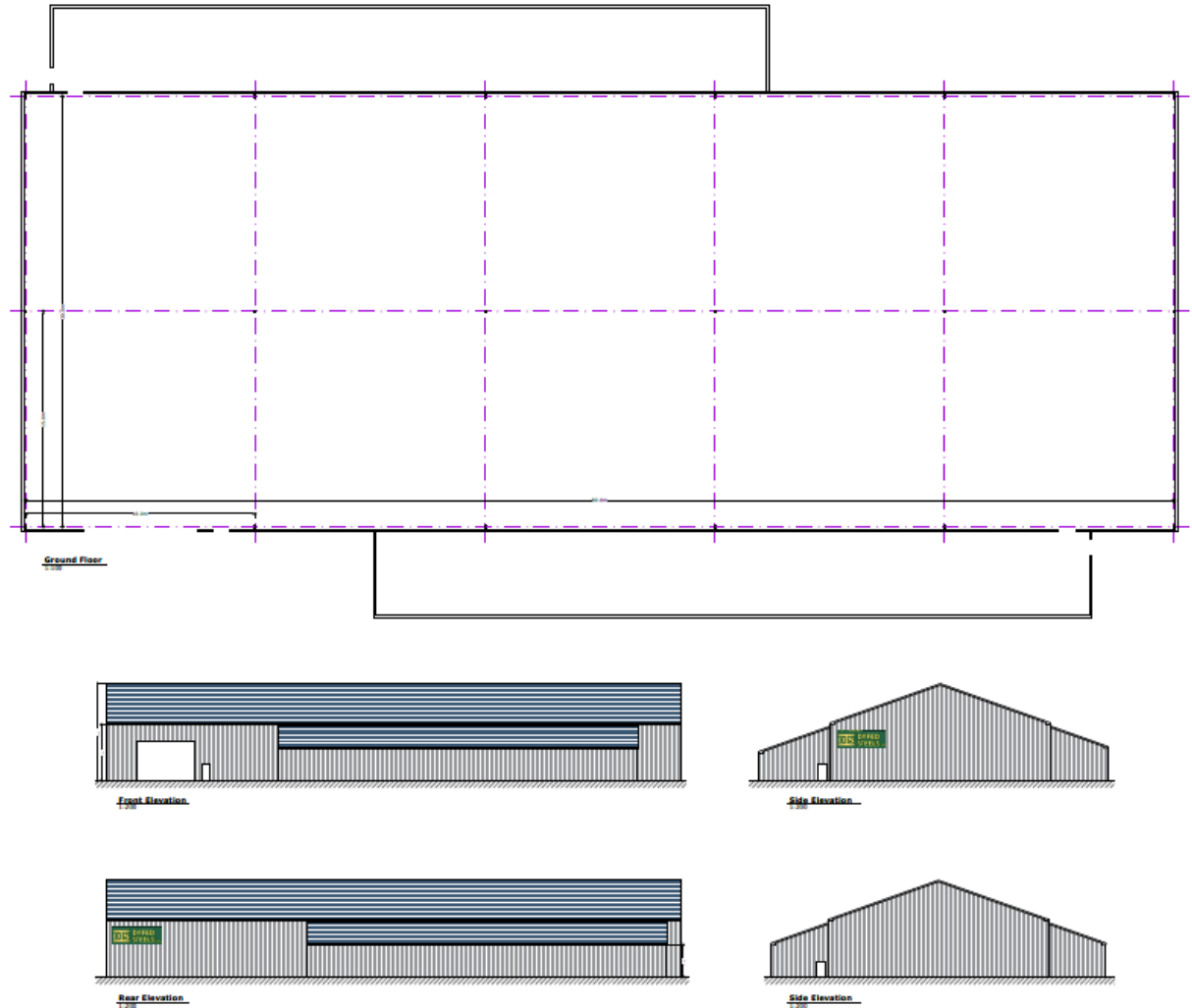
5.2 As aforementioned, it is the intention of the applicant to redevelop the site to create new industrial units (Use Class B2 - general industrial) and associated works.

5.3 As mentioned in Section 2, the site is largely an area of hardstanding, which is currently utilised for storage purposes in association with the wider general industrial use of the Dyfed Steels site. As discussed in the preceding sections, the design of the new industrial unit is required to address additional business demand and therefore must be capable of accommodating the business activities.. This includes being used to store higher grades of steel and accommodating a tube laser machine for the processing of steel in order to meet the current demands of the business

5.4 The advice provided as part of the pre-application advice obtained from the LPA indicated "the building should be of an appropriate scale and design compatible with its prominent location immediately adjacent to one of the principal routes into Llanelli".

5.5 As a result of the pre-application advice, the roof form and massing of the proposal has been amended to reflect the comments received and responds to the prominent location in close proximity to a principle route in to Llanelli.

PROPOSED FLOOR PLAN & ELEVATIONS



DESIGN EVOLUTION

Full Planning Submission

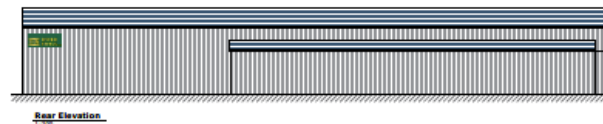
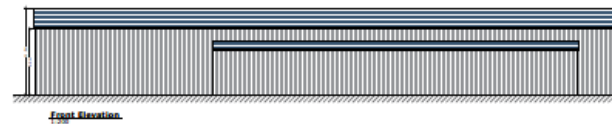
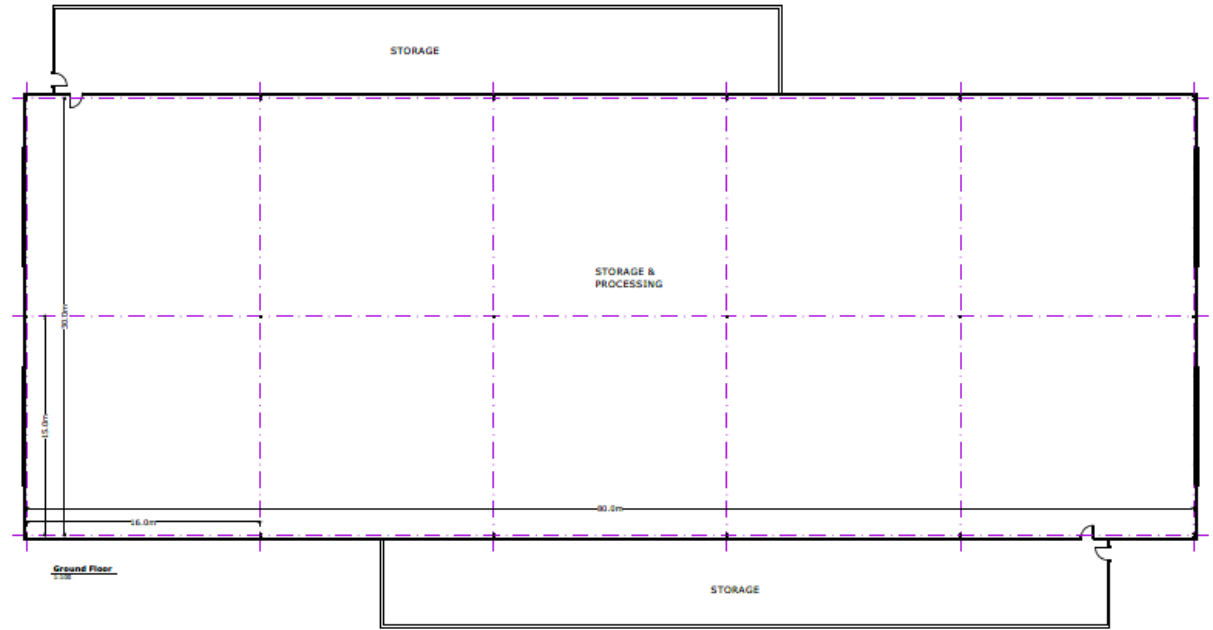
5.6 Following comments received from planning officers prior to submitting the application, the scheme has evolved accordingly.

5.7 As shown on the Proposed Floor Plan & Elevations, the proposed roof form and massing have been amended in recognition of the site location, adjacent to a main route in to Llanelli.

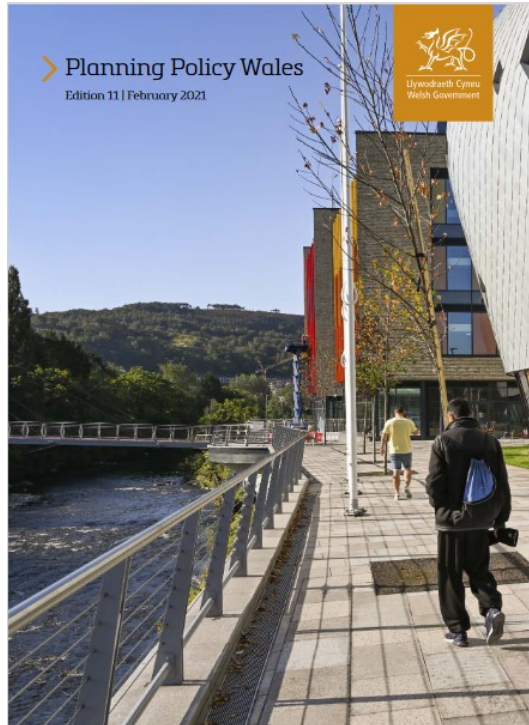
5.8 The gradient and pitch of the roof has been reduced, and this enables the massing, scale and visual extent of the proposal to be reduced, in recognition of the site's prominent position.

5.9 The design of the scheme has therefore evolved to positively respond to the pre-application comments in respect of design.

PROPOSED FLOOR PLAN & ELEVATIONS



PLANNING POLICY



6. Planning Policy Overview

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales - The National Plan 2040 (February, 2021);
- Carmarthenshire Local Development Plan 2006 - 2021 (adopted December, 2014).

6.2 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
- Carmarthenshire County Council Supplementary Planning Guidance

6.3 This section of the PDAS provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this application. For ease of reference, this overview is set out below at the national and local level.

National Level

The Well-Being of Future Generations (Wales) Act 2015

6.4 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires “public bodies to do things in pursuit of the economic, social,

environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”. The Act sets out seven ‘well-being’ goals as follows:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsive Wales

6.5 Within the Act, sustainable development is defined as follows: “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

National Development Framework: Future Wales – The National Plan 2040

6.6 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. ‘Future Wales’ sets out the Welsh Government’s 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. As stated above, the National Development Framework has Development Plan status.

6.7 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by

PLANNING POLICY



means of 11 Outcomes. The 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time which are as follows:

A Wales where people live:

1. *...and work in connected, inclusive and healthy places*
2. *...in vibrant rural places with access to homes, jobs and services*
3. *...in distinctive regions that tackle health and socio-economic inequality through sustainable growth*
4. *...in places with a thriving Welsh Language*
5. *...and work in towns and cities which are a focus and springboard for sustainable growth*
6. *...in places where prosperity, innovation and culture are promoted*
7. *...in places where travel is sustainable*
8. *...in places with world-class digital infrastructure*
9. *...in places that sustainably manage their natural resources and reduce pollution*
10. *...in places with biodiverse, resilient and connected ecosystems*
11. *...in places which are decarbonised and climate-resilient*

Placemaking

6.8 Placemaking forms a key concept upon which many national planning policies are based. *"Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration"*.

6.9 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*
- *integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.*

Planning Policy Wales Edition 12

6.10 Planning Policy Wales (PPW) Edition 12 was published on 24th February 2024. 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, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.

6.11 Sustainable Development is defined at Page 7 of PPW as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking*

PLANNING POLICY

action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.

6.12 Placemaking is a key thread running through the 12th Edition of PPW. It is described as an “inclusive process, involving all of those with a professional or persona interest in the built and natural environment, which focuses on developing plans, making decisions and delivering developments which contribute to the creation and enhancement of sustainable development.

6.13 PPW emphasises that good design is fundamental to creating sustainable places whilst previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.

Technical Advice Notes

6.14 Planning Policy Wales is supplemented by various Technical Advice Notes (TAN’s) which provide more in-depth guidance on specific issues. In this instance, guidance contained in TAN 5 Nature Conservation and Planning (2009), TAN 12 Design (2016) and TAN 18 Transport (2007).

Local Level

Carmarthenshire Local Development Plan

6.15 The Carmarthenshire Local Development Plan was adopted in 2014 and is the prevailing development plan for the County. The site lies within the defined settlement limits and within a designated existing employment allocation.

The LDP Proposals Map indicates the subject site is situated within the defined settlement boundary, as set out under **Policy GP2 Development Limits** of the adopted LDP, which states:

Development Limits are defined for those settlements identified as Growth Areas, Service Centres, Local Service Centres and

identified Sustainable Communities within the settlement framework.

Proposals within defined Development Limits will be permitted, subject to policies and proposals of this Plan, national policies and other material planning considerations”.

In addition to the site’s location within the development limits, the subject site is allocated for employment use and represents an existing employment area under **Policy EMP1 Employment – Safeguarding of Employment Sites**, which states (inter alia):

In respect of the expansion of employment operations / sites, **Policy EMP3 Employment – Extensions and Intensification** states:

“Proposals for extensions and/or intensification of existing employment enterprises will be permitted provided that:

The development proposals are not likely to cause environmental damage or prejudice other redevelopment proposals;

- A. The proposal does not extend and/or intensify a use or activity that might result in adverse amenity issues, or may not be compatible, with neighbouring uses;*
- B. The development proposals are of an appropriate scale and form compatible with its location;*
- C. Proposals for the expansion of existing rural enterprises will be supported subject to the above provisions and the policies and proposals of this Plan”.*

Further to the policy wording set out above, the supporting text indicates the operational expansion of existing firms will contribute significantly to the local economy, and is supported. As is the potential re-development of existing sites where it will improve the quality of employment floor space in order to meet modern employment needs.

6.16 The LDP policies considered relevant in the context of the proposed development are contained within the adjacent table.

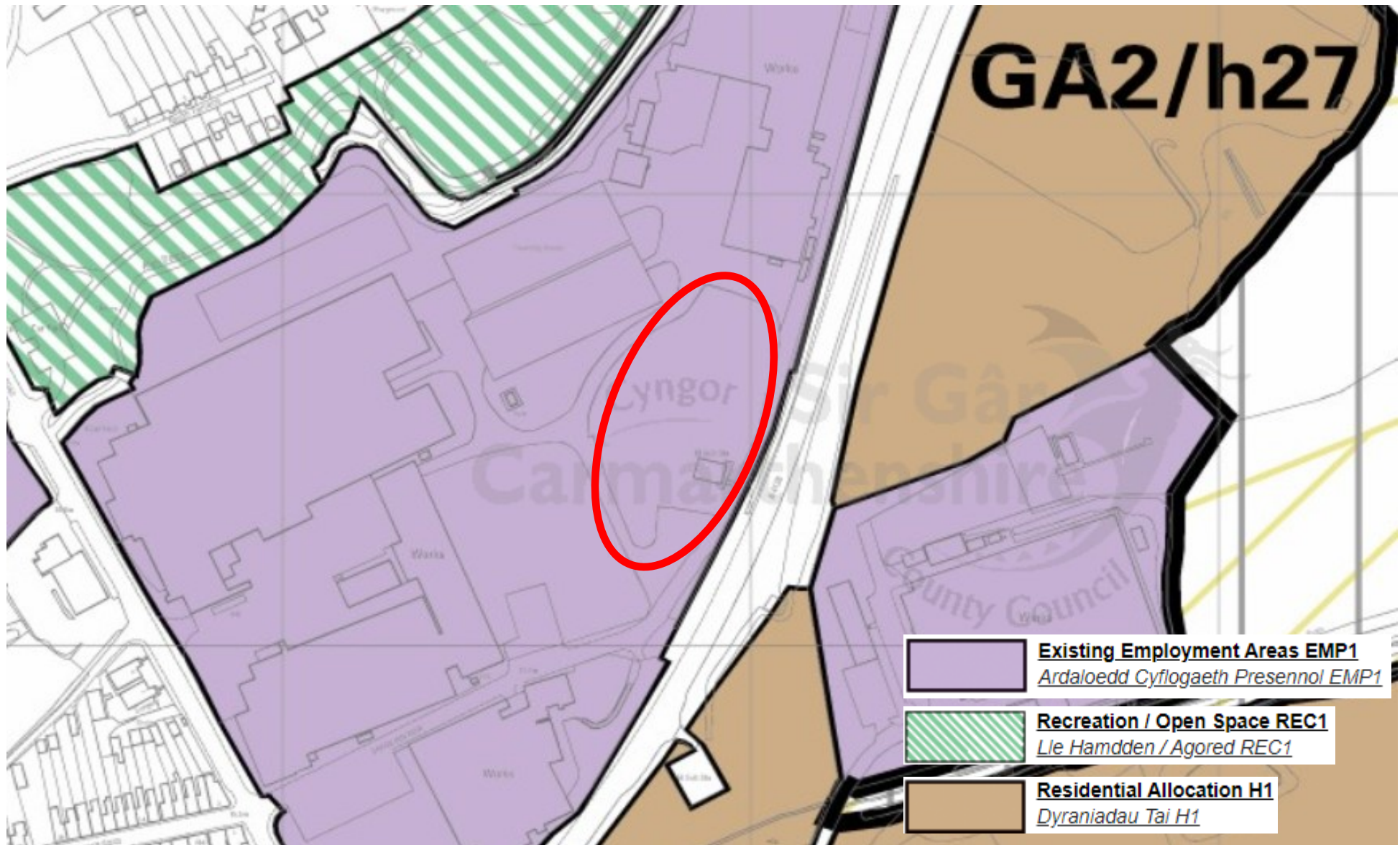
Supplementary Planning Guidance

6.17 The following adopted supplementary planning guidance are considered relevant to the proposal:

- Planning Obligations ;
- Nature Conservation & Biodiversity;
- Placemaking & Design

Policy Reference	Relating to...
<i>Placemaking and Sustainable Development</i>	
SP 1	Sustainable Places & Spaces
SP 2	Climate Change
SP 7	Employment – Land Allocations
SP 14	Protection & Enhancement of the Natural Environment
SP 17	Infrastructure
<i>General Policies</i>	
GP 1	Sustainability & High Quality Design
GP 3	Planning Obligations
GP 4	Infrastructure & New Development
TR 1	Primary & Core Road Networks
TR 2	Location of Development – Transport Considerations
TR 3	Highways in Developments – Design Considerations
TR 4	Walking & Cycling
EQ 4	Biodiversity
EP 1	Water Quality & Resources
EP 2	Pollution
EP 3	Sustainable Drainage

LDP PROPOSALS MAP



Approximate site location denoted by redline

THE PROPOSAL

Overview

7.1 The application proposes the development of new industrial units (Use Class B2 - general industrial) and associated works.

Access and Movement

7.2 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 site is accessible to pedestrians, cyclists and public transport users meaning that users of the development will not be reliant on the car.

7.3 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.

7.4 No alterations are proposed in respect to the site's access and parking arrangement. 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.

7.5 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.

Amount, Scale and Layout

7.6 The design features of the unit will be utilitarian in nature, with functionality as the principal consideration to adequately serve the requirements of the business. It is considered the amount of new build floorspace is compatible with the plot size. The layout responds to the context of the site surroundings, whilst the scale has been revised to positively

address comments received as part of the pre-application advice.

Appearance

7.7 The application proposals will see the erection of a purpose-built industrial unit. It is considered the proposals will be in keeping with the established character of the primarily employment use focussed area that the application site is situated within. As highlighted above, the subject site is allocated for employment use and the established architectural appearance of the area reflects this. The design proposals reflect the industrial uses that characterize this area of Llanelli. The new employment unit will utilise a functional design that is geared towards the requirements of the business.

Landscape and Biodiversity

7.8 A number of potential impacts on site have been avoided due to the arrangement of the development. In addition, existing trees and scrub are to be retained on site where possible to contribute to the overall ecological value.

7.9 The retention of a habitat corridor along the eastern boundary will enhance the connectivity within the site and to the wider landscape.

7.10 A range of planting proposals have been included within the development with the aim of mitigating any losses as a result of the development, diversify the existing ecosystem, and provide a net benefit for biodiversity.

Community Safety

7.11 TAN 12 suggests that community safety can be achieved via design solutions that can aid crime prevention. These include providing natural surveillance, improving safety by reducing conflicts in uses, and promoting a sense of ownership and responsibility.

7.12 It is considered that the site has been developed to

ensure the industrial unit can be safely accessed and operated by the Applicant, as part of their business expansion.

Environmental Sustainability

7.13 The site is located in a sustainable location, with good links to established transport and highways networks. It is envisaged the inherently sustainable location of the development will encourage active travel as a viable alternative to private vehicles.

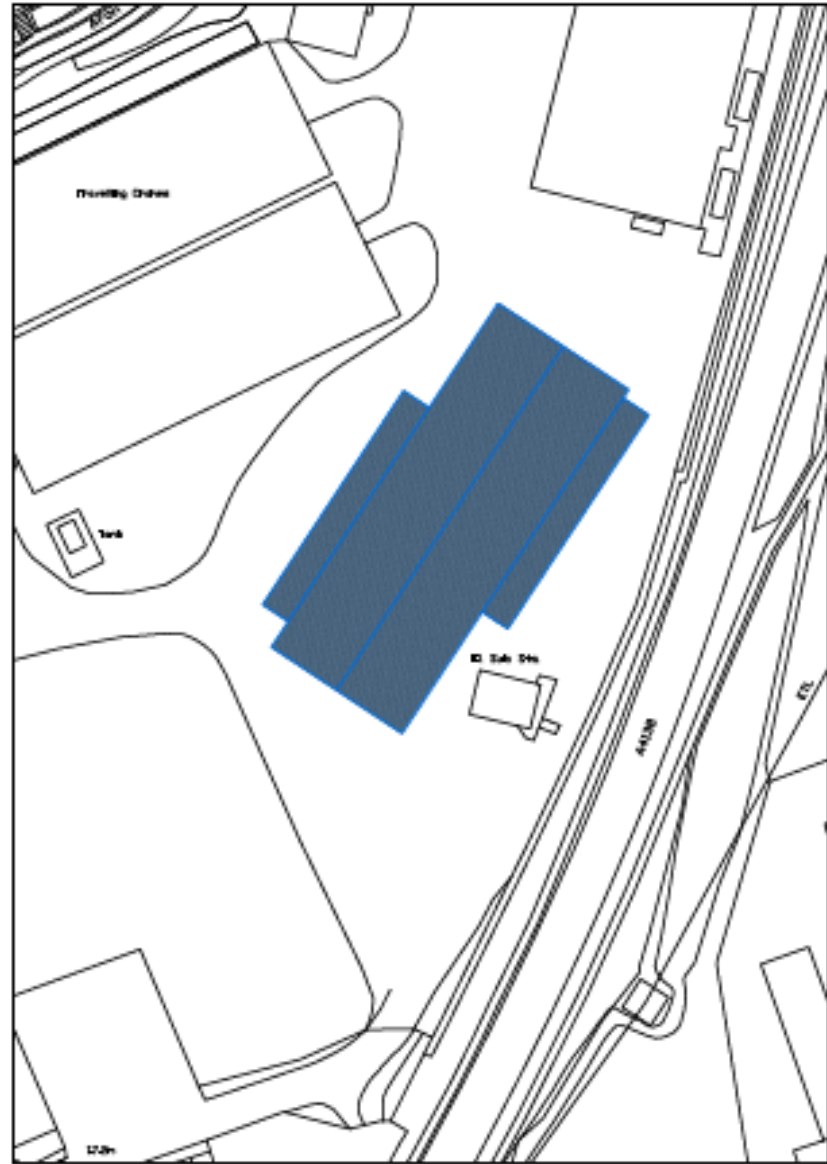
7.14 Furthermore, SUDS areas and drainage details are discussed within the supporting documents, showing the site's sustainable drainage credentials.

7.15 The proposed development represents the beneficial re-use of a currently under utilised brown field site. The site represents previously developed land, the re-development of which adheres to the climate change mitigation measures employed by the Welsh government, which priorities the development of brownfield sites, ahead of greenfield land. The scheme therefore represents the most efficient use of previously developed land.

SITE PLAN



Existing Site Plan
1/10/22



Proposed Site Plan
1/10/22

PLANNING APPRAISAL

8.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- Principle of development;
- Acceptability of Proposed Use
- Sustainability
- Appearance, Design & Amenity
- Highways, Access & Parking
- Drainage
- Ecology
- Landscaping & Green Infrastructure
- Trees
- Coal Mining Legacy
- Flood Risk
- Noise
- Site Investigation

Principle of Development

8.2 The application site is situated within the urban extent of Llanelli and crucially within the settlement boundary as set out under Policy GP 2 Development Limits of the adopted LDP, which indicates proposals within the defined Development Limits will be permitted, subject to other policies of the LDP, national policies and other material planning considerations. Furthermore, the supporting policy text indicates Policy GP 2 promotes the effective and appropriate use of land in order to concentrate growth within the defined settlement limits.

8.3 In addition to the site's location within the development limits, the subject site is allocated for employment use and represents an existing employment area under Policy EMP1 Employment – Safeguarding of Employment Sites, which states (inter alia): *“Employment land allocations identified through policy SP7 and existing employment sites will be safeguarded for such uses (B1, B2, B8).”* The proposals for additional employment development are therefore appropriately located given the allocation within the LDP and fully align with Policy EMP 1, which seek to safeguard sites for such uses.

8.4 The subject site is located within Llanelli, which is identified as a ‘growth area’ under Policy SP 3 Sustainable Distribution – Settlement Framework, the status of which reflects the high population levels and the availability of an extensive range of services and facilities. Growth areas are well served by facilities which are vital to supporting the principles of sustainability and are therefore capable of accommodating a proportionally high level of growth. In summary, Policy SP 3 directs the provision for growth and development towards sustainable locations in accordance with the Settlement Framework.

8.5 In summary, the development proposals are located within an existing employment land use allocation, within the settlement boundary of a ‘growth area’ which therefore establish a robust principle of development in accordance with the overarching strategic policies of the adopted LDP. This position is echoed within the pre-application advice provided by the LPA, which was broadly positive and supportive in respect of the principle of development.

Acceptability of Proposed Use

8.6 As highlighted above, the application proposals seek to develop a new warehouse structure for the purpose of improved and enlarged employment floorspace. In respect of the expansion of employment operations / sites, Policy EMP3 Employment – Extensions and Intensification states:

“Proposals for extensions and/or intensification of existing employment enterprises will be permitted provided that:

- a. *The development proposals are not likely to cause environmental damage or prejudice other redevelopment proposals;*
- b. *The proposal does not extend and/or intensify a use or activity that might result in adverse amenity issues, or may not be compatible, with neighbouring uses;*
- c. *The development proposals are of an appropriate scale and form compatible with its location;”*

8.7 In response to the permissance criterion set out under Policy EMP 3, the proposals will see the development of a new warehouse/industrial unit within the Dyfed Steels site situated wholly within an allocated employment site which is protected for such uses. Given the suitable location for further employment development within an existing employment site, it is envisaged environmental damage will

be avoided. Furthermore, it is anticipated the proposals will not prejudice the redevelopment of neighbouring sites, given the contained nature of the development proposals within the Dyfed Steels site.

8.8 As highlighted above, the proposals seek to provide additional employment uses at an existing and allocated site for employment uses. It is therefore anticipated that the proposed development would be highly compatible with neighbouring uses given the established industrial uses in the area. It is considered the scale and form of the proposals would represent development that is in keeping with its surroundings, comfortably assimilating with the established industrial uses which are located to the north, east and west of the subject site.

8.9 In addition to the policy wording set out above, the supporting text indicates the operational expansion of existing firms will contribute significantly to the local economy, and is supported. As is the potential re-development of existing sites where it will improve the quality of employment floor space in order to meet modern employment needs. In summary, the proposed development will contribute to both aspects of the supporting text, providing an expanded offering of industrial activities at the Dyfed Steels site and tangibly improving the existing employment floorspace. In conclusion, the acceptability of the proposed employment uses is firmly established.

Sustainability

8.10 The subject site is located within the urban extent of Llanelli and represents an existing employment allocation where such uses are directed. The proposals are situated in the established Dyfed Steels site, and are wholly brownfield in nature, comprising entirely previously developed land, in alignment with the presumption for the development of brownfield land ahead of greenfield land as advocated within Planning Policy Wales Edition 12.

8.11 In addition to the sustainable credentials of the scheme, the application site occupies an inherently sustainable location within an established settlement, a short distance from locally available services, facilities, public transport links and employment centres. The nearest bus stop is on Dafen Road, a short distance south of the Dyfed Steels main entrance, providing access to the L3 (Pontardulais) and L5 (Llanelli) services. The site benefits from excellent linkages to the

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surrounding highways network, alongside pedestrian footpath routes and presents opportunities for increased active travel. New improved active travel links have recently been completed in the area. In summary, the site's highly accessible and sustainable location allow for the proposals to be accessed via sustainable modes of active travel (on foot and cycle) and public transport.

8.12 The proposals for new and improved employment floorspace directly responds to the requirements of Policy SP 1 which sets out the need for sustainable development to improve the social and economic wellbeing of Carmarthenshire's population. The proposals will result in the creation of new job opportunities in Llanelli at an established and historically successful business that represents one of the key employers in the town and region. The creation of employment opportunities directly responds to the overarching strategy of Planning Policy Wales Edition 12 which seeks to grow the economy in a sustainable manner as part of the 'National Sustainable Placemaking Outcomes'. The 'Key Planning Principles' indicates the planning system should enable development which contributes to long term economic well-being, making the best use of existing infrastructure.

8.13 Paragraph 5.4.4 indicates "Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration". The principle of supporting economic growth is echoed by TAN 23 Economic Development. Specifically in regard to the weighting of economic benefit in the planning balance, paragraph 2.1.1 states "Planning should positively and imaginatively seek such 'win-win' outcomes, where development contributes to all dimensions of sustainability". Furthermore, paragraph 1.2.5 indicates "Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development".

8.14 As highlighted above, the proposals will see the new industrial warehouse unit 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. Although primarily a steel stockist, Dyfed Steels process approximately 60% of their output. The proposed development therefore responds to the need to expand

capacity to meet the demands of an important part of the business. In summary, the proposals will allow for a successful local business, and significant employer in the region to expand its range of service offerings, creating new employment opportunities – to the benefit of social and economic well-being locally in Llanelli and the wider Carmarthenshire area.

8.15 The development therefore accords with Policy SP 1 of the LDP which requires development to (inter alia) be directed to the most sustainable locations in adherence to the Plan's sustainable settlement framework and promote the efficient use of land including previously developed sites. Importantly, the proposals adhere to the requirement for sustainable development to improve the social and economic wellbeing – creating employment opportunities and allowing a regionally important business to grow.

Appearance, Design & Amenity

8.16 The application proposals will see the erection of a purpose-built industrial unit. It is considered the proposals will be in keeping with the established character of the primarily employment use focussed area that the application site is situated within. As highlighted above, the subject site is allocated for employment use and the established architectural appearance of the area reflects this. The design proposals reflect the industrial uses that characterize this area of Llanelli. The new employment unit will utilise a functional design that is geared towards the requirements of the business.

8.17 In respect of neighbouring residential amenity, it is anticipated that the proposals will not create significant impacts in respect of noise and disturbance. The nearest residential dwellings are found approximately 80 metres west of the Dyfed Steels site. It is envisaged this suitable separation distance between the two uses will ensure residential amenity levels are maintained.

Highways, Access & Parking

8.18 The new build industrial unit will be accessed internally via the main Dyfed Steels entrance from Dafen Road. The existing vehicle routes within the site will appropriately serve the new employment development. As highlighted above the site can also be accessed via Dafen Inn Row, which may provide an entrance for employees in private vehicles to access parking. An existing employee car park is situated to

the south of the site, adjoining Dafen Inn Row which will accommodate the increased parking demand as a result of the anticipated growth in staff numbers.

8.19 A Transport Statement has been prepared in support of the scheme by Acstro and provides the following findings and conclusions:

- 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.
- 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.
- 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.

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

Drainage

8.21 In accordance with the Flood and Water Management Act 2010 (Schedule 3), which requires new development to include Sustainable Drainage Systems features that comply with national standards, a Sustainable Drainage strategy will be

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prepared for the scheme as part of a SuDS application to the local SAB.

8.22 A Drainage Strategy has been prepared by CB3 Consult in support of the development proposals and sets out details of the approach to surface water management.

8.23 The scheme utilises surface water run-off reuse, collecting rain water in the rain gardens and reused by the hydration of planting. Rain gardens will form an important part of the landscape design and will be planted with native species to provide dense and durable vegetation cover that creates habitat for indigenous species.

8.24 An infiltration tank is utilised in the north of the site. Infiltration testing was undertaken in the proposed location of the tank which confirmed the acceptability of such a feature.. In summary water quality at the site will be achieved via the rain gardens and infiltration tank.

Ecology

8.25 A Preliminary Ecological Appraisal has been prepared by Bay Ecology in support of the proposed development. 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.

8.26 The proposed development works will be 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.

8.27 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 be water is expected within the SuDS.

8.28 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 released in the offsite marginal habitats located north of site.

8.29 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.

Landscaping & Green Infrastructure

8.30 A Green Infrastructure Statement has been prepared by Stiwdio Owens in support of the scheme. Overall, the stone aggregate yard was considered to be of negligible ecological interest and the grassland, tall ruderal and scrub were considered to be limited botanical diversity. The plateau habitats were considered to be of ecological importance on a local context and potentially utilised by nesting birds (scrub), foraging and commuting mammals and small numbers of amphibians.

8.31 A number of potential impacts on site have been avoided due to the arrangement of the development. In addition, existing trees and scrub are to be retained on site where possible to contribute to the overall ecological value.

8.32 The retention of a habitat corridor along the eastern boundary will enhance the connectivity within the site and to the wider landscape.

8.33 A range of planting proposals have been included within the development with the aim of mitigating any losses as a result of the development, diversify the existing ecosystem, and provide a net benefit for biodiversity.

Trees

8.34 An Arboricultural Report has been prepared by ArbTS in support of the development proposals. The Arboricultural Impact Assessment section provides the following findings:

- Tree Loss – AIA – N/A - No trees are required to be removed to facilitate the construction of the proposed development design.
- Root Protection Area (RPA) – AIA – LOW - RPA potential damage can be managed by installing tree protective fencing, as designed by an Arboriculturist will ensure no significant long-term adverse impact to any of the retained trees.
- Conclusion – AIA – LOW - The site has a couple of Arboricultural constraints that had to be considered in the development design phase. No trees are required to be removed to facilitate the construction of the proposed development design.

8.35 The construction of the proposed development, whilst complying with the tree protection scheme as detailed in section 6, will ensure that no significant long-term adverse Arboricultural impact occurs on the health of any retained trees on or adjacent to this site or the long-term amenity of the area.

8.36 The Report finds that by adhering to the tree protection details set out, the proposed development can be constructed without any significant long-term adverse impact on the retained trees or the area's amenity.

Coal Mining Legacy

8.37 The Coal Authority online mapping indicates the subject site is located within the Coal Mining Reporting Area and may likely be situated within the Development High Risk Area.

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8.38 A Coal Mining Risk Assessment has been prepared by Intégral Géotechnique (Wales) Limited in support of the development proposals. The report presents the findings of the desk study and coal mining searches and sets out the Coal Mining Risk Assessment in line with the Coal Authority guidelines.

Flood Risk

8.39 The TAN 15 Development Advice Map indicates the development parcels are located within Flood Zone A. The forthcoming Flood Map for Planning indicates the site is predominantly unconstrained by flood risk with only a minor extent of Surface Water Flood Zone 2 found to the south of the new industrial unit development extent. It is envisaged the Sustainable Drainage Strategy will contribute to the management of such risk. On this basis it is considered the developable land is unconstrained by flood risk.

Noise

8.40 Acoustic Consultant have undertaken a Noise Impact Assessment for the proposed development. A site noise survey was undertaken to determine the existing noise levels at the sensitive receivers along with operational noise levels to inform the assessment. The findings of the NIA indicate that operational noise will fall below existing background sound levels during both day and night periods..

8.41 With context also considered, absolute levels within a dwelling fall far below the indoor ambient noise level criteria in terms of relevant BS8233 criteria. When compared to the existing residual sound levels at the site, the operational noise levels fall below both day and night-time residual sound levels at the NSRs..

8.42 In summary, this clearly indicates operational noise will be acceptable and a low impact in terms of BS4142 and Planning Policy Wales.

Ground Investigation

8.43 A Desk Study Report has been prepared by ntégral Géotechnique (Wales) Limited in support of the application submission. The Report finds that prior to redevelopment of the site, a comprehensive intrusive site investigation would be required, over the entire site, in order to facilitate a detailed technical and financial appraisal. This would enable the foundation and hardstanding design for the proposed new

building to be developed using specific data on the ground conditions and enable more accurate costings to be made.

8.44 It is therefore envisaged that these investigations will accompany the full planning application. Furthermore, it is anticipated that further Site Investigation works will form a conditional requirement of any future planning permission.

CONCLUSION

9.1 This Planning, Design and Access Statement (PDAS) has been prepared in support of a full planning application to be submitted to the Carmarthenshire County Council for the proposed development of a new industrial unit at Dyfed Steels, Maescanner Road, Dafen, Llanelli, SA14 8NS. In summary, this Planning Statement makes the following pertinent points::

- The development proposals are located within an existing employment land use allocation, within the settlement boundary of a 'growth area' which therefore establish a robust principle of development in accordance with the overarching strategic policies of the adopted LDP;
- The proposed development will provide an expanded offering of industrial activities at the Dyfed Steels, increasing the quantum of high quality employment floorspace. In conclusion, the acceptability of the proposed employment uses is firmly established.
- The proposed development would be highly compatible with neighbouring uses given the established industrial uses in the area. It is considered the scale and form of the proposals would represent development that is in keeping with its surroundings, comfortably assimilating with the established industrial uses which are located to the north, east and west of the subject site.
- The proposed development can be considered highly sustainable, in accordance with both local and national level planning policy. The development accords with Policy SP 1 of the LDP which requires development to (inter alia) be directed to the most sustainable locations in adherence to the Plan's sustainable settlement framework and promote the efficient use of land including previously developed sites. Importantly, the proposals adhere to the requirement for sustainable development to improve the social and economic

wellbeing – creating employment opportunities and allowing a regionally important business to grow.

- The design proposals reflect the industrial uses that characterize this area of Llanelli. The new employment unit will utilise a functional design that is geared towards the requirements of the business.
- In respect of neighbouring residential amenity, it is anticipated that the proposals will not create significant impacts in respect of noise and disturbance.
- In addition to the key points addressed above, the scheme demonstrate compliance with all other material planning considerations including; highways & access, transport, design, residential amenity, parking, ecology, flood risk, coal mining legacy, landscaping & green infrastructure, drainage & noise.

9.2 To conclude, we believe the proposals represent a policy compliant scheme when considered against the relevant local and national level planning policies. On this basis we politely request that the application be positively determined, and planning permission be granted without delay.