### CYNGOR GWLEDIG LLANELLI Adeiladau Vauxhall, Vauxhall, Llanelli, SA15 3BD Ffôn: 01554 774103

### **PWYLLGOR CYSWLLT A CHYNLLUNIO**

I'w cynnal yn Siambr y Cyngor a thrwy bresenoldeb o bell ar, Ddydd Llun, 10 Mawrth, 2025, 4.45 y.h.

Mark followith

**CLERC y CYNGOR** 

4 Mawrth, 2025

### AGENDA

- 1. Derbyn ymddiheuriadau am absenoldeb.
- 2. Derbyn Datganiad o Fuddiannau gan Aelodau mewn perthynas â'r busnes i'w drafod.
- 3. <u>Ceisiadau Cynllunio</u> cytuno i ymateb y Cyngor mewn perthynas â'r ceisiadau cynllunio canlynol a dderbyniwyd gan Gyngor Sir Gâr:-
  - (1) PL/08912 45 Heol Pendderi, Llanelli
  - (2) PL/08922 Ysgol Gyfun Bryngwyn, Heol Dafen, Dafen, Llanelli
  - (3) PL/08924 12 Heol y Bwlch, Bynea, Llanelli
- 4. <u>Mater drafodwyd yn unol a phwerau a ddirprwywyd i'r Clerc</u> nodi ymateb y Cyngor ynghylch y Cyngor Sir Caerfyrddin cais cynllunio a newidiwyd:-
  - (1) PL/08228 Gateway Holiday Park, Bynea, Llanelli
  - (2) PL/08811. Cwrt Newydd, Felinfoel, Llanelli
  - (3) PL/08891 28 Stryd y Maswr, Llanelli
  - (4) PL/08898 103 Rhodfa Denham, Llanelli
- 5. <u>Ymgynghori cyn gwneud cais am Hysbysiad Caniatâd Cynllunio o dan Erthyglau 2C a 2D o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012</u> derbyn gohebiaeth gan WSP Planning Consultants cyn gwneud cais am ganiatâd cynllunio ar gyfer adeiladu ffyrdd mynediad newydd, seilwaith cysylltiedig a gwaith peirianyddol i ffurfio lleiniau ynghyd â chaniatâd cynllunio amlinellol ar gyfer unedau diwydiannol newydd ar y lleiniau ar dir yn Safle Cyflogaeth Dafen, Heol Rhosyn, Llanelli a chytuno ar ymateb y cyngor.
- 6. Sir Gaerfyrddin Gosod 40 M.P.H. Gorchymyn terfyn cyflymder 25 o dan Adrannau 84(1)(a), 84(2) a 124 o baragraff 27 o Atodlen 9 i Ddeddf Rheoleiddio Traffig Ffyrdd 1984 (fel y'i diwygiwyd) – Gosod 40 M.P.H. terfyn cyflymder – HTTR/1844 – Gosod 40 M.P.H. terfyn cyflymder – HTTR/1844 – derbyn gohebiaeth gan Gyngor Sir Caerfyrddin ynghylch y Gosodiad uchod o 40 M.P.H. terfyn cyflymder ar Heol Dosbarth II, B4308 o Benymynydd i Ffwrnes, Llanelli ac i gytuno ar ymateb y cyngor.

### Aelodau'r Pwyllgor:

Cyng: A. J. Rogers (Cadeirydd y Pwyllgor), E. M. Evans (Is-Gadeirydd y Pwyllgor), S. N. Lewis, (Arweinydd Y Cyngor), S. R. Bowen, M. V. Davies, S. L. Davies, S. M. T. Ford, J. Lovell, S. K. Nurse, O. Williams.

### LLANELLI RURAL COUNCIL

Vauxhall Buildings, Vauxhall, Llanelli, SA15 3BD Tel: 01554 774103

### PLANNING AND LIAISON COMMITTEE

To be hosted at the Council Chamber and via remote attendance on on Monday, 10 March, 2025, at 4.45 p.m.

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Alash fallrait

CLERK to the COUNCIL

4 March, 2025

### AGENDA

- 1. To receive apologies for absence.
- 2. To receive Members' Declarations of Interest in respect of the business to be transacted.
- 3. <u>Planning Applications</u> to agree the council's response in respect of the following planning applications received from Carmarthenshire County Council:-
  - (1) PL/08912 45 Pendderi Road, Llanelli
  - (2) PL/08922 Bryngwyn Comprehensive School, Dafen Road, Dafen, Llanelli
  - (3) PL/08924 12 Heol y Bwlch, Bynea, Llanelli
- 4. <u>Matters dealt with under the Clerk's delegated powers</u> to note the Council's response to Carmarthenshire County Council in respect of the following planning applications:
  - (1) PL/08228 Gateway Holiday Park, Bynea, Llanelli
  - (2) PL/08811 Cwrt Newydd, Felinfoel, Llanelli
  - (3) PL/08891 28 Stryd y Maswr, Llanelli
  - (4) PL/08898 103 Denham Avenue, Llanelli
- 5. Consultation before applying for Planning Permission Notice under Articles 2C and 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 – to receive correspondence from WSP Planning Consultants before applying for planning permission for the construction of new access roads, associated infrastructure and engineering works to form plots plus outline planning permission for new industrial units on the plots on land at Dafen Employment Site, Heol Rhosyn, Llanelli and to agree the council's response.
- 6. The County of Carmarthenshire Imposition of 40 M.P.H. speed limit Order 25 under Sections 84(1)(a), 84(2) and 124 of paragraph 27 of Schedule 9 to the Road Traffic Reulations Act 1984 (as amended) – Imposition of 40 M.P.H. speed limit – HTTR/1844 – to receive correspondence from Carmarthenshire County Council in regards to the above Imposition of a 40 M.P.H. speed limit on Class II Road, B4308 from Penymynydd to Furnace, Llanelli and to agree the council's response.

### Members of the Committee:

Cllrs. A. J. Rogers, (Chairman of Committee), E. M. Evans (Vice-Chairman of Committee), S. N. Lewis (Leader of Council), S. R. Bowen, M. V. Davies, S. L. Davies, S. M. T. Ford, J. Lovell, S. K. Nurse, O. Williams.

## ITEM NO. 3

pitch roof over (retrospective).

Application No.	Location	Development
PL/08912	Mr Evans 45 Pendderi Road Llanelli (Bynea Ward)	Demolition of existing domestic garage to slab level and reinstatement on a 'like for like' basis.
Recommendation – no obje	ection.	
PL/08922	Carmarthenshire County Council Bryngwyn Comprehensive School Dafen Road Dafen (Dafen Ward)	Variation of condition 2 on PL/04178 as amended by PL/05506 (to allow for a revised design of the link to enclose the ground floor).
Recommendation – no obje	ection.	
PL/08924	Mr S Cole 12 Heol y Bwlch Bynea	Single storey/rear extension. Raise walls of existing rear first floor bedroom and bathroom with new

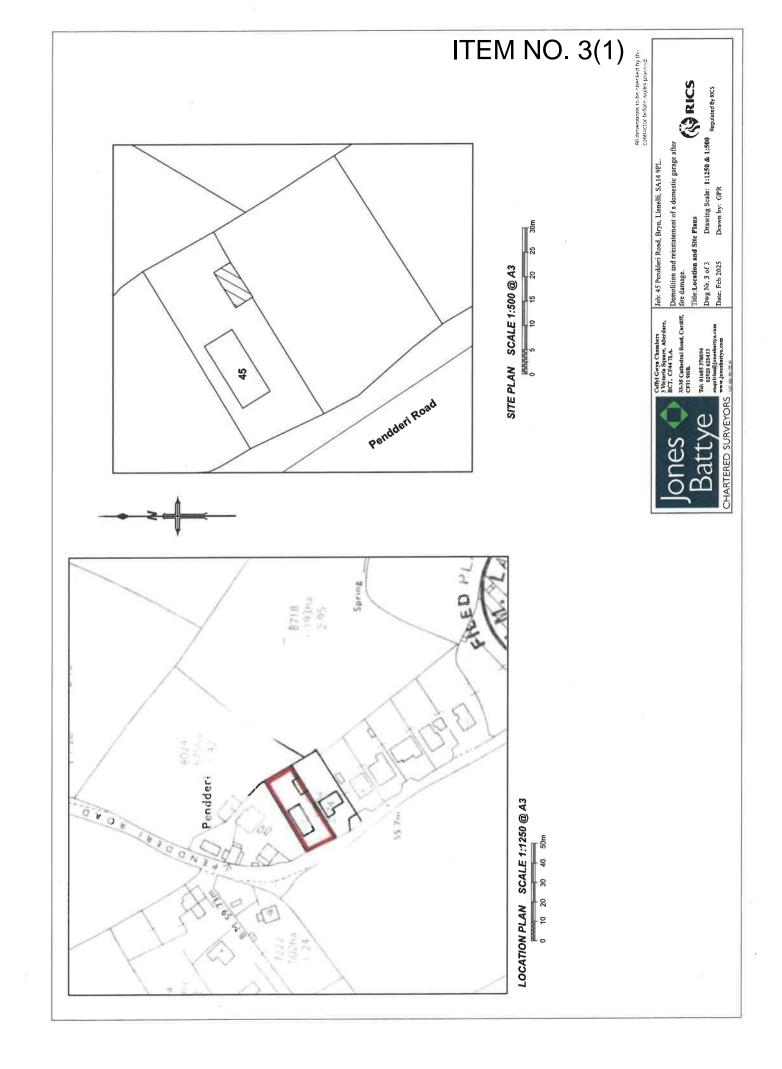
Recommendation – no objection provided:

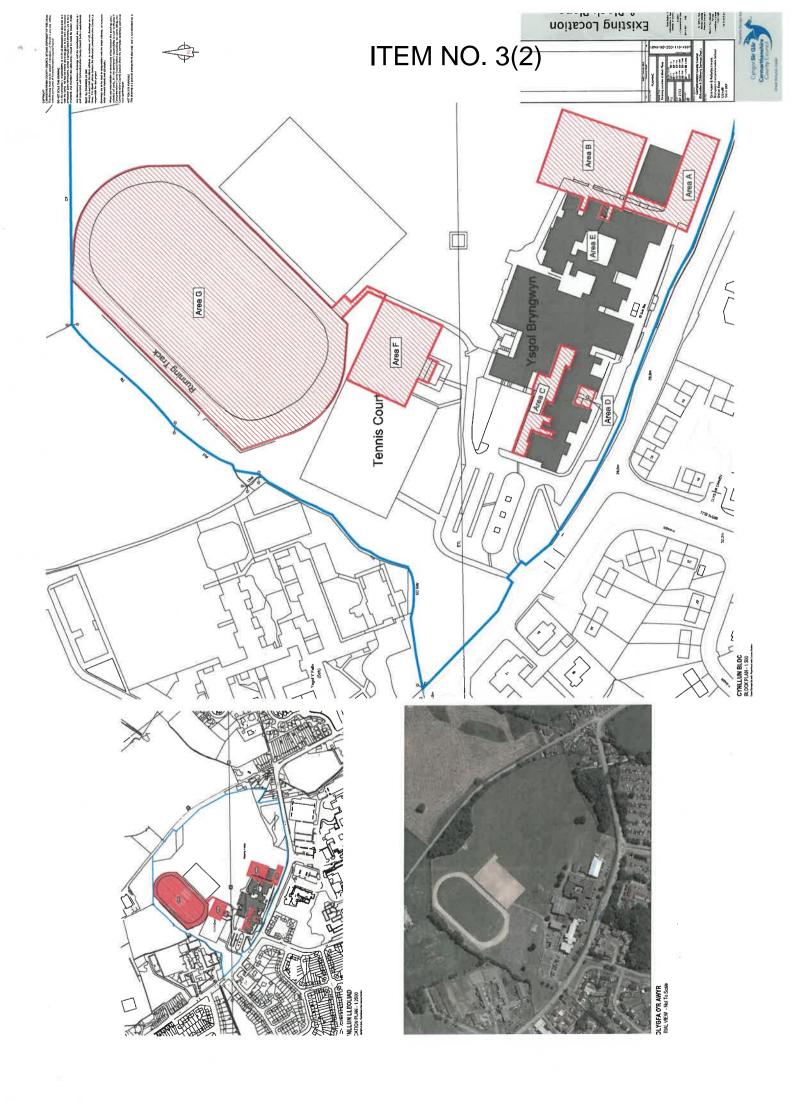
1. The combination of extensions is subordinate to the main dwelling.

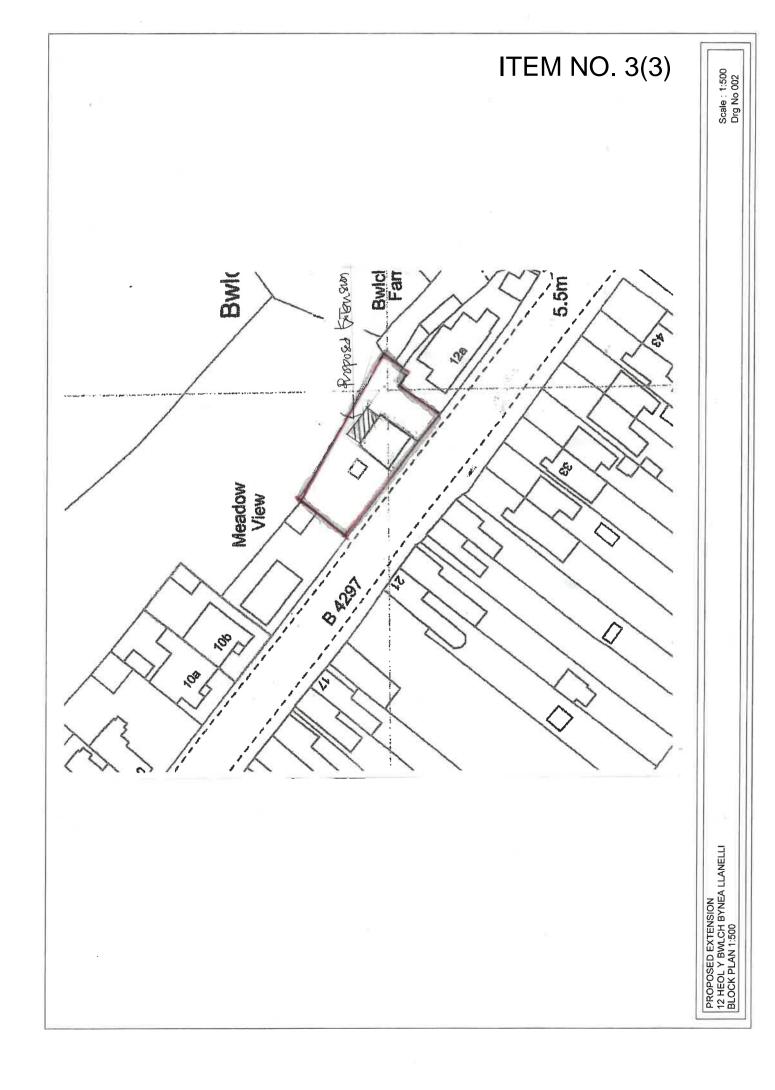
(Bynea Ward)

Llanelli

2. There is no detrimental impact on the amenity and privacy of neighbouring dwellings.







and

Application No.	Location	Development
The following application	ns have been determined under t	he Clerk's delegated powers:
PL/08228	Mr K Strelley Gateway Holiday Park Bynea	Extensions to main resort building, comprising: (I) Proposed front extension. (II) Rear and side canopy

extensions (Retrospective) Ancillary Structures (Retrospective). Comprising: i) Amusement fun ride and play area with activity tent. ii) connecting pedestrian underpass.

Recommendation - no objection provided:

Llanelli

(Bynea Ward)

- 1. The recommendations set out in the accompanying ecological appraisal report and the coal mining report were met in full.
- 2. There was no detrimental impact on local biodiversity in regard to all proposals set out in the application.

PL/08811	Mr R Rees
	Cwrt Newydd
	Felinfoel
	Llanelli
	(Felinfoel Ward)

Proposed infilling of existing courtyard to form new entry foyer to dwelling.

Recommendation – no objection.

PL/08891

Mrs R Griffiths 28 Stryd y Maswr Llanelli (Hengoed Ward)

Two storey rear extension and internal alterations.

Recommendation - no objection.

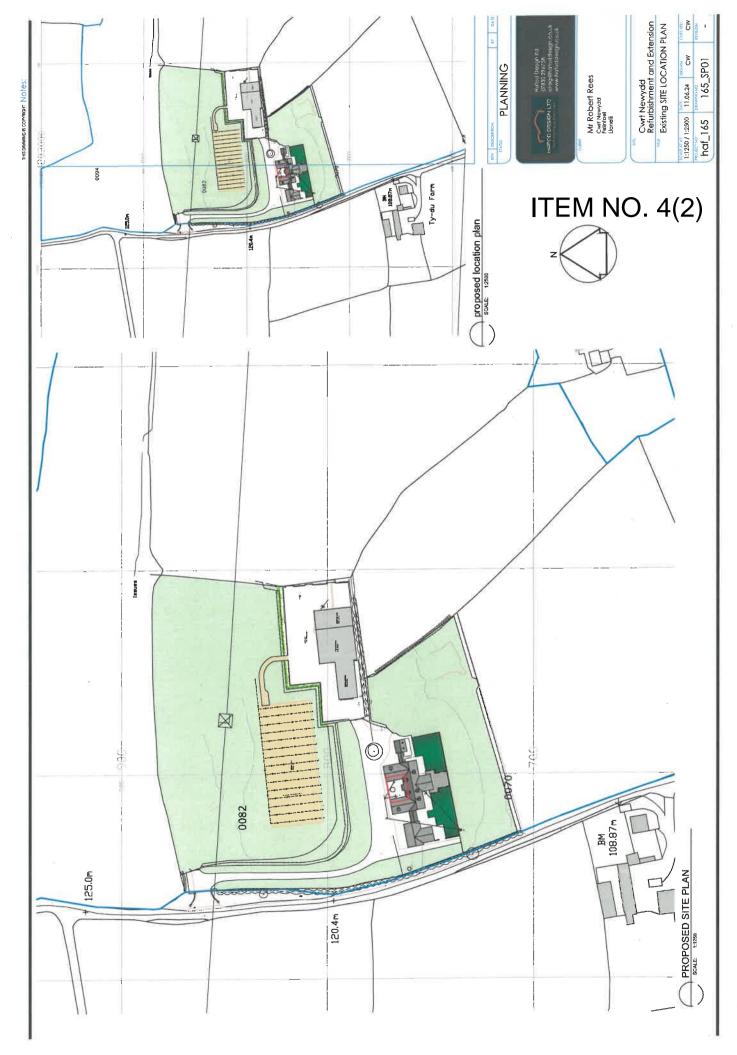
PL/08898

Mr C Pike 103 Denham Avenue Llanelli (Hengoed Ward)

Two storey bedroom and utility room extension.

Recommendation - no objection.





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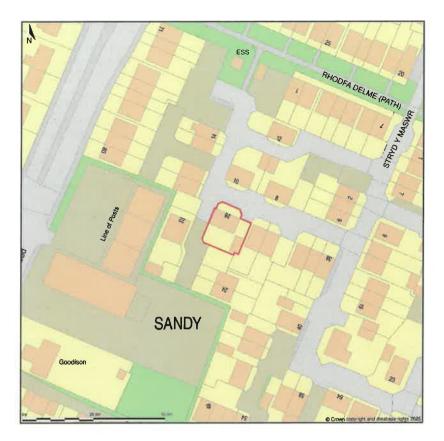
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## 🎁 Buy A Plan

## **ITEM NO. 4(3)**



### 28. Stryd Y Maswr, Llanelli, Carmarthenshire, SA15 4DZ



Location Plan shows area bounded by: 249601.54, 200689.97 249742.97, 200831.39 (at a scale of 1:1250), OSGridRef: SN4967 76. The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.

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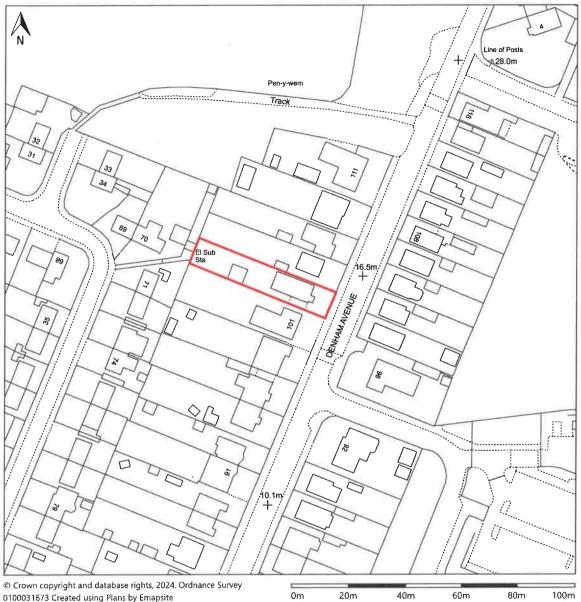
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### DRAWING NUMBER - D1 (LOCATION PLAN)

### 103, DENHAM AVENUE, LLANELLI, CARMARTHENSHIRE, SA15 4DD



#### HMLR Title No: WA798142



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Scale: 1:1250

Paper Size: A4

Notes:

LOCATION PLAN





NSD	COMMUNIT		ITEM NO. 5
	DATE	2 7 FEB 2025	
	FILE REF.		
Mr Mark Galbraith Vauxhall Buildings, Vauwhall	PASSED TO	PAL	Our ref: 70096175 26 February 2025
Vauxhall, Llanelli, SA15 3BD			

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D OF THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012

Dear Sir/Madam,

### **Re: Dafen Employment Site**

I'm writing to give notice of a planning application to be submitted by Welsh Ministers (Property Infrastructure). The works relate to a "Hybrid Planning Application comprising: Full Planning Permission for the construction of new access roads, associated infrastructure (including drainage) and engineering works to form the plots, plus Outline Planning Permission (all matters reserved - apart from access) for new industrial units on the plots - Class B1/B2/B8 use" on land at **Dafen Employment Site, Heol Rhosyn, Llanelli.** 

This letter provides information on the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the Local Planning Authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA. Any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

You may inspect copies of the proposed application, the plans and other supporting documentation online at <a href="https://dafen-pac-wspglobal.hub.arcgis.com/">https://dafen-pac-wspglobal.hub.arcgis.com/</a> using the public computers at the following locations:

#### Llanelli Library, Vaughan Street, Llanelli, SA15 3AS. Opening Times:

Monday 9:00-7:00pm; Tuesday 9:00am-6:00pm; Wednesday 9:00am-6:00pm; Thursday 9:00-7:00pm; Friday 9:00-6:00pm; Saturday 9:00am-5:00pm; Sunday - Closed.

#### Llwynhendy Library, Heol Elfed, Llwynhendy, SA14 9HH. Opening Times:

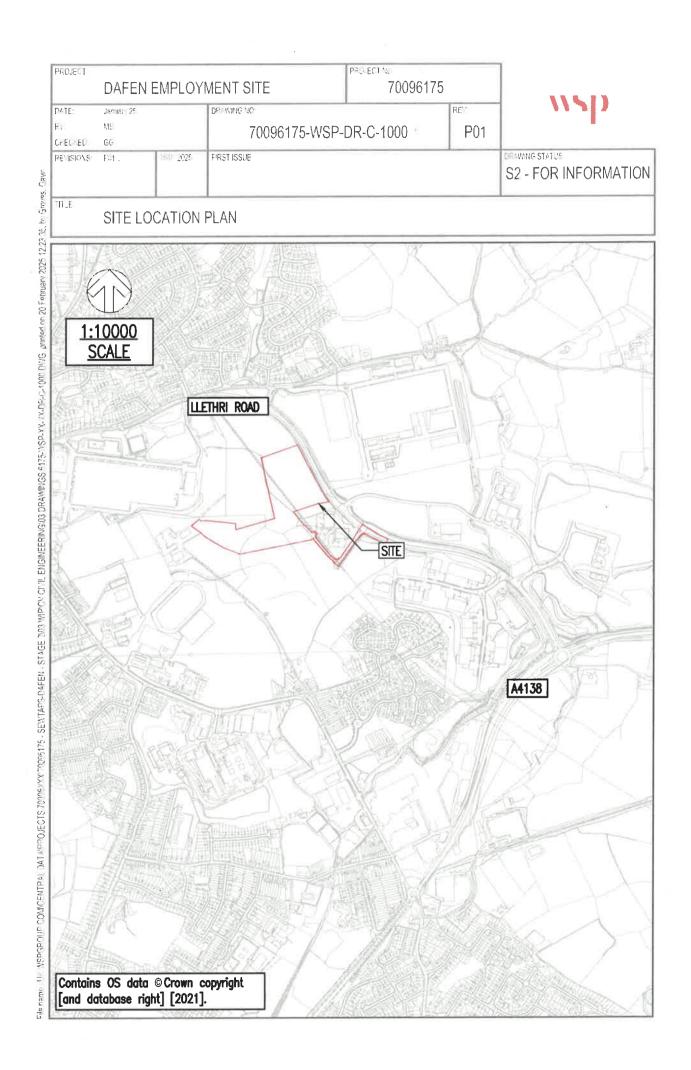
Monday 10:00am-5:00pm (Closed 1:00pm-2:00pm); Tuesday – Closed; Wednesday 14:00-6:00pm; Thursday - Closed; Friday 10:00am-5:00pm (Closed 1:00pm-2:00pm); Saturday 10:00am-1:00pm; Sunday - Closed.

If you wish to make representations about this Proposed Development, please write to the agent by **26/03/2025** - Abigail Huntley, Senior Town Planner, WSP in the UK, 1 Capital Quarter, Tyndall Street, Cardiff. CF10 4BZ. **E-mail:** <u>Abigail.Huntley@wsp.com</u>

Yours sincerely,

Ahundrey .

Abigail Huntley - Planning Consultant





Welsh Ministers

## DAFEN EMPLOYMENT SITE

Planning, Design and Access Statement



Welsh Ministers

## DAFEN EMPLOYMENT SITE

Planning, Design and Access Statement

**TYPE OF DOCUMENT (VERSION) PUBLIC** 

PROJECT NO. 70096175

DATE: FEBRUARY 2025

WSP

1 Capital Quarter Tyndall Street Cardiff CF10 4BZ Phone: +44 2920 769 200

WSP.com

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## QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	For PAC			
Date	February 2025			
Prepared by	Mike Tuthill			
Signature				
Checked by	Anna Dennison			
Signature				
Authorised by	Gavin Lewis			
Signature				
Project number	70096175			
Report number				
File reference				

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### 1 INTRODUCTION

1.1.1. This Planning, Design and Access Statement (PDAS) accompanies a hybrid planning application, submitted on behalf of the Welsh Ministers ('the Applicant'), in relation to the following Proposed Development:

"Hybrid Planning Application comprising: Full Planning Permission for the construction of new access roads, associated infrastructure (including drainage) and engineering works to form the plots, plus Outline Planning Permission (all matters reserved - apart from access) for new industrial units on the plots - Class B1/B2/B8 use."

1.1.2. The PDAS analyses the development in the context of the requirements of relevant planning policy and guidance (both National and Local) to provide an overarching analysis of the proposals in the context of site specific and general development policies.

### 1.2 LEGISLATIVE CONTEXT

- 1.2.1. Following the Welsh Government's review of Design and Access Statements in 2013, changes were made to the requirements for a Design and Access Statement. The Town and County Planning (Development Management Procedure) (Wales) Order 2012 (as amended) requires Design and Access Statements to be submitted with certain planning applications, as detailed below. A Design and Access Statement is required to accompany planning applications (outline or full) for:
  - "Major" development except those for mining operations, waste developments, relaxation of conditions (section '73' applications) and applications for a material change in use of land or buildings; and
  - Development in a conservation area or World Heritage Site which are for the provision of one or more dwellings or the creation of floorspace of 100 sq. m. (gross) or more.
- 1.2.2. The definition of 'major' development, as set out in legislation, includes;
  - Housing developments of 10 or more dwellings or where the site area is of 0.5 hectares or more;
  - The provision of a building(s) where the floorspace created exceeds 1,000sqm;
  - The winning and working of minerals or the use of land for mineral-working deposits;
  - Waste development; and
  - Development carried out on a site of 1ha or more.
- 1.2.3. As the Proposed Development has a site area of 5.16ha, it therefore meets the requirements for Major Development.

### 1.3 PURPOSE AND SCOPE OF DEVELOPMENT

1.3.1. The Proposed Development is a Hybrid Planning Application comprising:

Full Planning Permission for the construction of new access roads, associated infrastructure (including drainage) and engineering works to form the plots.

And

Outline Planning Permission (all matters reserved – apart from access) for new industrial units on the plots – Class B1/B2/B8 use.

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- 1.3.2. Potential future accesses to the land to the north and west are indicated. These parcels of land have been put forward for potential inclusion within the Revised LDP.
- 1.3.3. In line with the relevant guidance, the Design and Access Statement element of this document aims to explain the design concepts and principles applied to the development in relation to:
  - Character;
  - Access;
  - Movement;
  - Environmental Sustainability;
  - Community Safety; and
  - Response to Planning Policy.

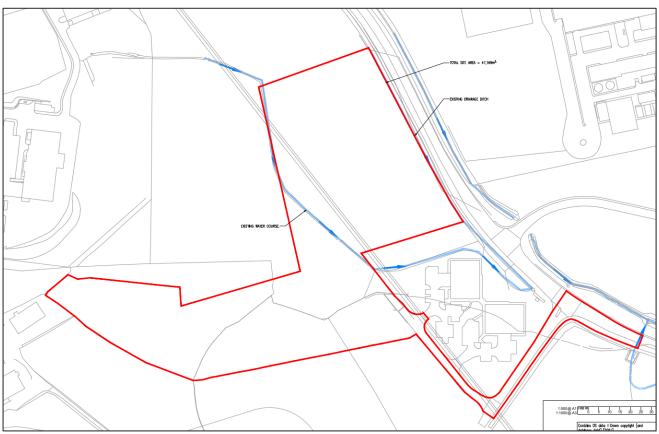
### 1.4 SUPPORTING DOCUMENTS

- 1.4.1. This PDAS should be read in conjunction with the following documents which will accompany the planning application:
  - Planning Application Forms;
  - Planning Drawings;
  - Lighting Specifications;
  - Landscape Design;
  - Green Infrastructure Statement;
  - Geo-Environmental Preliminary Risk Assessment (incl. CMRA);
  - Preliminary Ecological Appraisal (PEA) 2021;
  - Preliminary Ecological Appraisal (PEA) 2023;
  - Ecological Mitigation Technical Note;
  - Walkover Report;
  - Habitat Regulations Screening Assessment;
  - Bat Survey Report;
  - Dormouse Survey Report;
  - Reptile Survey Report;
  - Tree Survey and Assessment;
  - Noise Impact Assessment;
  - Transport Assessment;
  - Drainage Strategy and Flood Risk; and
  - Drainage Design.
- 1.4.2. Please note, a Pre-Application Consultation (PAC) Report will be submitted with the planning application following consultation.

## 2 SITE AND CONTEXT ANALYSIS

### 2.1 THE SITE AND SURROUNDINGS

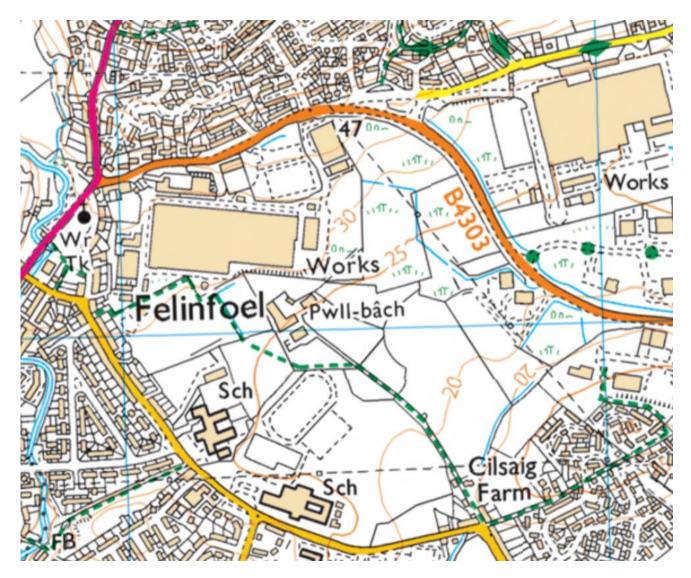
2.1.1. The Proposed Development has a site area of 47.169m2, as shown in Figure 2-1 below, with Llethri Road located adjacent to the eastern boundary of the site. The main land uses of the surrounding area compromise of commercial land, residential settlements and small woodland areas. The surrounding land and field parcels currently support multiple landowners and occupiers predominantly commercial holdings along with land at Calsonic Football club located to the north of the site boundary.



### Figure 2-1 - Site Location Plan

- 2.1.2. The National Grid Reference (NGR) for each of the western and eastern site area boundaries is as follows:
  - Heol Rhosyn- SN527020
  - North of Cilsaig Road- SN524020

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### Figure 2-2 - OS Map of the site

- 2.1.3. A number of bus routes run close to the site. The L2 bus route runs to the north of the site with the closest stops being at Llethri Road and Blaen Nant. A public footpath 36/88/1 runs to the south-west of the site. The nearest railway stations are Llanelli 3.4km to the south and Llangennech 3.8km to the east of the site.
- 2.1.4. A shared use active travel path runs along Llethri Road. National Cycle Route 47, an off-road active travel route linking Llanelli to Cross Hands is located 800m to the west of the site as shown in Figure 2-3.

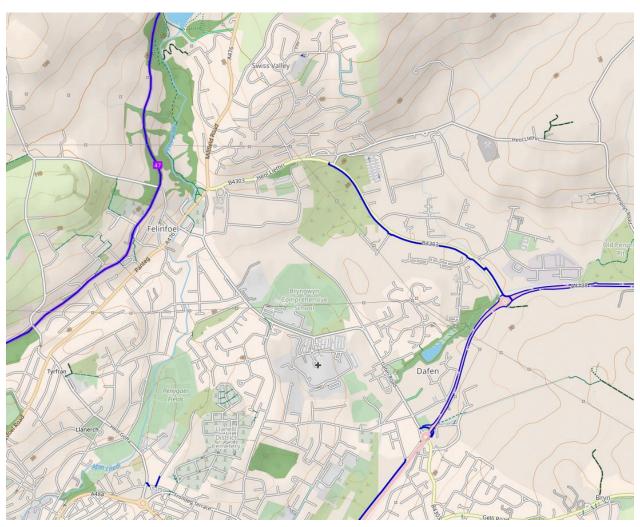


Figure 2-3 - Map of active travel infrastructure close to the site

### 2.2 CONTEXT ANALYSIS

2.2.1. The objective of the scheme is to improve the provision of industrial facilities in order to foster business development in the area. Once completed, the proposed development will provide purpose-built units for new and existing businesses to utilise, improving economic growth and providing jobs.

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## 3 CONSULTATION

### 3.1 PRE-APPLICATION DIALOGUE

- 3.1.1. A pre-application request was submitted to CCC planning department on 14<sup>th</sup> July 2023, and a response received on 11<sup>th</sup> September 2023. The response is within **Appendix A**.
- 3.1.2. The pre-application response noted the relevant policies to the Proposed Development, these are discussed further in Section 4.2. This includes Policy EMP2 New Employment Proposals, which requires a sequential search to be undertaken to identify that there are no alternative sites that can reasonably accommodate the use. The pre-application response states that a comprehensive case will need to be made as to why the Proposed Development cannot be accommodated elsewhere.
- 3.1.3. The pre-application response concluded that the Proposed Development as it stands would not be supported due to the lack of evidence in respect of Policy EMP2, and that there are also site specific considerations that require further review. However, the pre-application response does note that the Proposed Development is located within an employment focused area, and further review should be given to emerging regional and local policy.
- 3.1.4. Since the pre-application response was received, a sequential search per Policy EMP2 has been undertaken. This is discussed further in Section 4.2. In addition, site specific considerations are addressed further in Section 6.
- 3.1.5. Correspondence from consultees received during the pre-application process also stated that the planning application should include:
  - Coal mining risk assessment report;
  - Contaminated land risk assessment;
  - Tree report;
  - Transport Assessment;
  - Preliminary Ecological Appraisal; and
  - SuDS application.

### 3.2 ENVIRONMENTAL IMPACT ASSESSMENT

- 3.2.1. The Proposed Development has been reviewed against the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 to determine whether an Environmental Impact Assessment (EIA) is required to accompany the planning application.
- 3.2.2. An EIA Screening Opinion request was submitted to CCC on the 28<sup>th</sup> February 2024 (LPA Ref. SCO/02078), seeking to confirm whether the Proposed Development is EIA Development. The request was formally required as the Proposed Development falls into Category 10 of Schedule 2 (Infrastructure projects (b) Urban Development Projects and (f) Construction of Roads) and the Site area exceeds the threshold of 1ha (the Site is circa 5.16ha).
- 3.2.3. A response from CCC was received on 1<sup>st</sup> May 2024 to confirm that the development is unlikely to have a significant effect on the environment. Therefore, it is not deemed to be EIA Development. A copy of the EIA Screening Opinion Request, and the response is included within Appendix B.

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### 3.3 PRE-APPLICATION CONSULTATION

3.3.1. In accordance with Part 1A of the Town and Country Planning (Development Management Procedures) (Wales) Order 2016, all major developments (over 1 hectare) are required to carry out Pre-Application Consultation (PAC), prior to submission to the Local Planning Authority. Therefore, this planning application will be accompanied by a Pre-Application Consultation Report which will demonstrate compliance with section 61Z of the Town and Country Planning Act 1990, and how consultation responses have been received and considered. Table 2-1 below provides a summary of the Pre-Application Consultation actions undertaken to date.

Pre-Application Consultation Actions	Date Requirement Actioned	Requirement Satisfied
Display a site notice	TBC (following PAC)	
Write to "any owner or occupier of any land adjoining the land to which the proposed application relates"	TBC (following PAC)	
Consult "community" and "specialist" consultees	TBC (following PAC)	$\checkmark$
Make the draft application available publicly	TBC (following PAC)	$\checkmark$

### Table 3-1 – Pre-Application Consultation Summary

3.3.2. Full details of all PAC activities undertaken in connection with the Proposed Development will be set out in the Pre-Application Consultation Report which will accompany the planning application.

### 4 PLANNING POLICY

### 4.1 NATIONAL PLANNING POLICY

### PLANNING POLICY WALES

4.1.1. Planning Policy Wales 12 (PPW) was adopted on 12<sup>th</sup> February 2024, it sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs). The policies within Table 3-1 are considered to be of relevance to the site and proposed development.

### Table 4-1 – PPW 12 Planning Policies

Policy	Description
1.18: The Planning System in Wales	Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.
2.8: Maximising Well-being and Creating Sustainable Places through Placemaking	Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales.
2.15 and Figure 5: National sustainable placemaking outcomes	<ul> <li>The national sustainable placemaking outcomes should be used to inform the assessment of development proposals:</li> <li>Creating and Sustaining Communities;</li> <li>Growing Our Economy in a Sustainable Manner;</li> <li>Making Best Use of Resources;</li> <li>Maximising Environmental Protection and Limiting Environmental Impact; and</li> <li>Facilitating Accessible and Healthy Environments.</li> </ul>
3.12: Movement	Good design is about avoiding the creation of car- based developments. It contributes to minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate.
3.20: Promoting Healthier Places	The planning system should identify proactive and preventative measures to reduce health inequalities.

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	This will include enabling opportunities for outdoor activity and recreation, reducing exposure of populations to air and noise pollution, promoting active travel options and seeking environmental and physical improvements, particularly in the built environment.
3.39: Placemaking in Rural Areas	For most rural areas the opportunities for reducing car use and increasing walking, cycling and use of public transport are more limited than in urban areas. In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. Development in these areas should embrace the national sustainable placemaking outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys.
3.43: Strategic Placemaking	Planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development.
3.7: Environmental Sustainability	Good design promotes environmental sustainability and contributes to the achievement of the well-being goals. Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.
4.1.19: Active and Social Streets	Well-designed, people orientated streets are fundamental to creating sustainable places and increasing walking, cycling and use of public transport. New development should improve the quality of place and create safe, social, attractive streets where people want to walk, cycle and enjoy, and children can play.
4.1.26, 4.1.27, 4.1.29 & 4.1.33: Active Travel	Walking and cycling are good for our health and well- being. They support valuable social and recreational opportunities and are integral to placemaking, creating life and activity in public places and providing the opportunity to meet people. Sustainable places invite people to walk and cycle as part of their everyday routine.
	The Active Travel (Wales) Act 2013 makes walking and cycling the preferred option for shorter journeys, particularly everyday journeys.

	The planning system has an important role to play in promoting and supporting the delivery of the Active Travel Act and creating the right environments and infrastructure to make it easier for people to walk and cycle, including new and improved routes and related facilities. The Active Travel Act requires local authorities to produce Active Travel Network Maps (ATNMs), identifying the walking and cycling routes required to create fully integrated networks for walking and cycling to access work, education, services and facilities. Development plans must identify and safeguard active travel routes and networks, including those identified in the Integrated Network Maps required by the Active Travel Act, and support their delivery. Planning authorities should also seek to assist in completion of the national cycle network and key links to and from the network. These measures should, where appropriate, be aligned with approaches to secure green infrastructure.
4.5.7: Recreational Spaces	Planning authorities should consider scope to use disused land and routes as parks, linear parks or greenways in urban areas and encourage the provision of safe and attractive cycle routes and footpaths. Where recreational use of redundant railway lines or spaces alongside canals or rivers is proposed, planning authorities should ensure that there is no detriment to adjoining users, wildlife or flood defences.
5.3.4: Productive & Enterprising Places – Transport Infrastructure	Great care must be taken to minimise the adverse impacts of new or improved transport infrastructure on the natural, historic and built environment and on local communities, including on public health resulting from community severance and airborne pollution. Routes should make the best use of existing landforms and other landscape features to reduce noise and visual effects, subject to safety and other environmental considerations.
5.4.1, 5.4.2, 5.4.4 Economic Development	The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses. Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. Economic land uses also include construction, energy,

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	minerals, waste and telecommunications sectors which are also sensitive to planning policy. This section focuses primarily on traditional employment land uses (B1, B2 and B8) while policies on other economic sectors are found elsewhere in PPW. Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development.
5.4.13 Steering economic development to the most appropriate locations	<ul> <li>Planning authorities should aim to:</li> <li>co-ordinate development with all forms of infrastructure provision such as transport and utilities;</li> <li>support national, regional, and local economic policies and strategies;</li> <li>align jobs and services with housing and sustainable transport infrastructure, to reduce the need for travel, and dependency on travel by car;</li> <li>promote the re-use of previously developed, vacant and underused land;</li> <li>deliver physical regeneration and employment opportunities to disadvantaged communities;</li> <li>control and manage the release of unwanted employment sites to other uses;</li> <li>propose specific locations for locally and strategically important industries which are detrimental to amenity and may be a source of pollution; and</li> <li>identify protection zones around land and premises that hold hazardous substances and protect the ability of existing businesses to operate or expand by preventing the incremental development of vulnerable uses in the locality.</li> </ul>
5.11.6 Making Best Use of Material Resources and Promoting the Circular Economy	The materials or resources needed and made available by development, and those it may generate, should be considered at an early stage in the planning process to assist in ensuring cost effective construction. Time spent at the design stage is a vital means of making effective use of resources and securing multiple benefits, such as economic prosperity, the resilience of ecosystems, fulfilling social aspirations and protecting the amenity and health of communities.
6.2.12 Integrating Green Infrastructure and Development	A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the

	development proposed and will describe how green infrastructure has been incorporated into the proposal.
6.9.23 Physical Ground Conditions and Land Instability	When considering development proposals planning authorities should take into account the nature, scale and extent of ground instability which may pose direct risks to life and health, buildings and structures, or present indirect hazards associated with ground movement, including mine entry collapse, which provide potential pathways for the migration to the surface of landfill or mine gases. Slopes, embankments, cuttings and underground cavities can themselves be put at risk from inappropriate neighbouring development and, where relevant, land stability should be addressed and appropriate mitigation measures secured to protect both existing assets and proposed development itself.

### TECHNICAL ADVICE NOTES

4.1.2. Each Technical Advice Note (TAN) provides detailed planning advice on a different topic. They should be read along with the Planning Policy Wales (PPW) document which sets out the land use planning policies. The TANs relevant to this application have been set out below:

### TAN 4 RETAIL AND COMMERCIAL DEVELOPMENT (2016)

4.1.3. This TAN provides guidance regarding the provision of retail and commercial developments, including assessment of the appropriateness of such development spatially, and the potential resultant impacts upon established retail centres. The documents also provide guidance regarding where such developments should be encouraged.

### TAN 5, NATURE CONSERVATION AND PLANNING (2009)

4.1.4. This TAN provides guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It also provides advice on development affecting designated sites and habitats, in addition to protected or priority habitats and species.

### TAN 12, DESIGN (2016)

4.1.5. This TAN provides guidance on how good design should be achieved through the planning process. Paragraph 2.6 of TAN 12 states that "design which is inappropriate in its context, or which fails to grasp opportunities to enhance the character, quality and function of an area, should not be accepted, as these have detrimental effects on existing communities".

### TAN 15, DEVELOPMENT AND FLOOD RISK (2004)

4.1.6. This TAN provides guidance which supplements the policy set out in PPW in relation to development and flooding. It includes development control procedures to mitigate flood risk when planning for new development.

### TAN 18, TRANSPORT (2007)

- 4.1.7. This TAN describes how to integrate land use and transport planning. It explains how transport impact should be assessed and mitigated.
- 4.1.8. In responding to such challenges, the Assembly Government adopts a sustainable development approach as the overarching framework within which strategies and policies are developed. PPW and the Wales Transport Strategy both aim to secure the provision of transport infrastructure and services, which improve accessibility, build a stronger economy, improve road safety and foster more sustainable communities.

### TAN 23 ECONOMIC DEVELOPMENT (2014)

- 4.1.9. This TAN defines economic development broadly so that it can include any form of development that generates wealth, jobs and income.
- 4.1.10. Paragraphs 1.2.1-2 highlight that the economic benefits of proposals and market needs should be fully considered when determining planning applications:

'The economic benefits associated with development may be geographically spread out far beyond the area where the development is located. As a consequence, it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development.

PPW advises that planning for economic land uses should aim to provide the land that the market requires, unless there are good reasons to the contrary. Where markets work well, this will help maximise economic efficiency and growth'.

### **FUTURE WALES (FEBRUARY 2021)**

- 4.1.11. Future Wales is the National Development Framework for Wales, setting the direction for development in Wales to 2040. Future Wales is a spatial 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 communities.
- 4.1.12. 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.

- 4.1.13. 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 means of 11 Outcomes. As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time, as follows:
- 4.1.14. 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

### **Growth Strategy**

- 4.1.15. The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows: Policy 1 – Where Wales will Grow: The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:
  - Cardiff, Newport and the Valleys
  - Swansea Bay and Llanelli
  - Wrexham and Deeside
- 4.1.16. It is further explained that "Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources" (page 60).
- 4.1.17. The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows: "Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being" (page 60).

### Placemaking

4.1.18. Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that "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".

- 4.1.19. 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.

#### **Green infrastructure**

4.1.20. To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration. Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated.

#### **Biodiversity and Green Infrastructure**

- 4.1.21. It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires "an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable" (page 76).
- 4.1.22. Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:
- 4.1.23. 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.

### Transport

- 4.1.24. Future Wales identifies that transport in Wales is currently dominated by the car and that "our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people's everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people's health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation" (page 85).
- 4.1.25. Policy 28 of Future Wales indicates that Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. Policy 1 is the overarching framework for where development and growth will be focused in each region. Future Wales' spatial strategy identifies that growth in the South West region should be focused in the Swansea Bay and Llanelli area. The area comprising Neath, Port Talbot, the City of Swansea and Llanelli will be the primary growth area for the region. This area is the main existing centre of population, employment and services and is served by the main connectivity infrastructure.

### WELL-BEING OF FUTURE GENRATIONS ACT (WALES) (2015)

4.1.26. This document states that the "Well-being of Future Generations (Wales) Act is about improving the social, economic, environmental and cultural well-being of Wales. It will make the public bodies listed in the Act think more about the long-term, work better with people and communities and each



other, look to prevent problems and take a more joined-up approach. This will help us to create a Wales that we all want to live in, now and in the future. To make sure we are all working towards the same vision, the Act puts in place seven well-being goals":

#### Figure 4-1 - WBFGA - Well-being goals

- 4.1.27. The Act has seven goals that are listed as key objectives which the scheme will help to achieve. In particular, three of the goals are considered to be directly relevant to the scheme, as per the below:
  - A prosperous Wales an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work. By facilitating high quality business facilities, the proposed development will help generate wealth and provide employment opportunities;
  - A more equal Wales— a society in which people's opportunities are not constrained by their geographical location is supported by the proposed development which will provide opportunities for local business development and employment; and
  - A Wales of cohesive communities attractive, viable, safe and well-connected communities. With its ability to enhance employment and commerce in this part of Carmarthenshire, enabling residents to find employment opportunities in the local area the proposed development will enhance the surrounding communities.

### 4.2 LOCAL PLANNING POLICY

### CARMARTHENSHIRE COUNTY COUNCIL LOCAL DEVELOPMENT PLAN 2006-2021

- 4.2.1. The Carmarthenshire County Council Local Development Plan (LDP) 2006-2021 was adopted on 10th December 2014. Whilst work has commenced on the revised LDP, until it has been formally adopted this is the current LDP in place for all planning decisions.
- 4.2.2. In line with the Pre-Application advice received from Carmarthenshire County Council (CCC) on the proposed development, the LDP Policies within Table 3-2 are considered to be relevant to the proposed development:

Policy	Description
SP1 – Sustainable Places and Spaces	Proposals for development will be supported where they reflect sustainable development and design principles by:
	a) Protect and enhance the area's biodiversity value and where appropriate, seek to integrate nature conservation into new development.
SP2 - Climate Change	Development proposals which respond to, are resilient to, adapt to and minimise for the causes and impacts of climate change will be supported. In particular proposals will be supported where they:
	a) Adhere to the waste hierarchy and in particular the minimisation of waste;
	b) Promote the efficient consumption of resources (including water);
	c) Reflect sustainable transport principles and minimise the need to travel, particularly by private motor car;
	d) Avoid, or where appropriate, minimise the risk of flooding including the incorporation of measures such as SUDS and flood resilient design;

	e) Promote the energy hierarchy by reducing energy demand, promoting energy efficiency and increasing the supply of renewable energy;
	f) Incorporate appropriate climate responsive design solutions including orientation, layout, density and low carbon solutions (including design and construction methods) and utilise sustainable construction methods where feasible.
	Proposals for development which are located within areas at risk from flooding will be resisted unless they accord with the provisions of TAN 15.
SP3 - Sustainable Distribution – Settlement Framework	<ul> <li>Provision for growth and development will be at sustainable locations in accordance with the following Settlement Framework:</li> <li>Llanelli identified as a Growth Area.</li> </ul>
SP7 - Employment – Land Allocations	Sufficient land is allocated for the provision of 111.13 hectares of employment land for the plan period 2006 – 2021 in accordance with the Settlement Framework. Proposals for small scale employment undertakings (not on allocated sites) will be permitted where they are in accordance with Policy EMP2.
SP9 - Transportation	Provision is made to contribute to the delivery of an efficient, effective, safe and sustainable integrated transport system through:
	a) Reducing the need to travel, particularly by private motor car;
	<ul> <li>b) Addressing social inclusion through increased accessibility to employment, services and facilities;</li> </ul>
	c) Supporting and where applicable enhancing alternatives to the motor car, such as public transport (including park and ride facilities and encourage the adoption of travel plans), and active transport through cycling and walking;
	d) Re-enforcing the function and role of settlements in accordance with the settlement framework;
	e) Promoting the efficient use of the transport network;
	f) The use of locational considerations for significant trip generating proposals, with design and access solutions within developments to promote accessibility by non car modes of transport.
	Transport routes, improvements and associated infrastructural facilities which deliver the objectives and priorities of the Regional Transport Plan for South West Wales will be supported. Furthermore, maintaining and enhancing good traffic flows and the attractiveness and viability of more sustainable transport modes which support the strategy and its sustainable objectives will also be supported. Development proposals which do not prejudice the efficient implementation of any identified improvement or scheme will be permitted.
SP14 – Protection and Enhancement of	Development should reflect the need to protect, and wherever possible enhance the County's natural environment. All development proposals should be considered in accordance with national guidance/legislation and

the Natural Environment	the policies and proposals of this Plan, with due consideration given to areas of nature conservation value, the countryside, landscapes and coastal areas, including those outlined below:
	a) Statutory designated sites including Ramsar sites, SPAs, SACs, SSSIs and National Nature Reserves.
	<ul> <li>b) Biodiversity and Nature Conservation Value, including protected species and habitats of acknowledged importance as well as key connectivity corridors and pathways; (Policy EQ4 and EQ5);</li> </ul>
	c) Regional and locally important sites (and their features) including Local Nature Reserves, RIGS (see Policy EQ3);
	e) Features which contribute to local distinctiveness, nature conservation value or the landscape; (see Policy EQ5); and
	h) Natural assets: including air, soil (including high carbon soils) controlled waters and water resources (See Policies EP1 and EP2).
SP17 - Infrastructure	Development will be directed to locations where adequate and appropriate infrastructure is available or can be readily provided. The LDP therefore supports the economic provision of infrastructure by allocating sites in identified settlements and in accordance with the Settlement Framework.
	Planning Obligations relating to developer contributions towards necessary infrastructure improvements may be sought subject to policy GP3.
GP1 – Sustainability and High-Quality	Development proposals will be permitted where they accord with the following:
Design	a) It conforms with and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing, elevation treatment, and detailing;
	<ul> <li>b) It incorporates existing landscape or other features, takes account of site contours and changes in levels and prominent skylines or ridges;</li> </ul>
	c) Utilises materials appropriate to the area within which it is located;
	d) It would not have a significant impact on the amenity of adjacent land uses, properties, residents or the community;
	e) Includes an integrated mixture of uses appropriate to the scale of the development;
	f) It retains, and where appropriate incorporates important local features (including buildings, amenity areas, spaces, trees, woodlands and hedgerows) and ensures the use of good quality hard and soft landscaping and embraces opportunities to enhance biodiversity and ecological connectivity;
	g) It achieves and creates attractive, safe places and public spaces, which ensures security through the 'designing-out-crime' principles of Secured by Design (including providing natural surveillance, visibility, well lit environments and areas of public movement);

	h) An appropriate access exists or can be provided which does not give rise to any parking or highway safety concerns on the site or within the locality;
	i) It protects and enhances the landscape, townscape, historic and cultural heritage of the County and there are no adverse effects on the setting or integrity of the historic environment;
	j) It ensures or provides for, the satisfactory generation, treatment and disposal of both surface and foul water;
	k) It has regard to the generation, treatment and disposal of waste.
	I) It has regard for the safe, effective and efficient use of the transportation network;
	m) It provides an integrated network which promotes the interests of pedestrians, cyclists and public transport which ensures ease of access for all;
	n) It includes, where applicable, provision for the appropriate management and eradication of invasive species.
	Proposals will also be considered in light of the policies and provisions of this Plan and National Policy (PPW: Edition 7 and TAN12: Design (2014)).
GP2 – Development Limits	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.
GP3 - Planning Obligations	The Council will, where necessary seek developers to enter into Planning Obligations (Section 106 Agreements), or to contribute via the Community Infrastructure Levy to secure contributions to fund improvements to infrastructure, community facilities and other services to meet requirements arising from new developments.
	Where applicable, contributions will also be sought towards the future and ongoing maintenance of such provision either in the form of initial support or in perpetuity.
	In implementing this policy schemes will be assessed on a case-by-case basis
GP4 - Infrastructure for New	Proposals for development will be permitted where the infrastructure is adequate to meet the needs of the development.
Development	Proposals where new or improved infrastructure is required but does not form part of an infrastructure provider's improvement programme may be permitted where it can be satisfactorily demonstrated that this infrastructure will exist, or where the required work is funded by (or an appropriate contribution is provided by) the developer.
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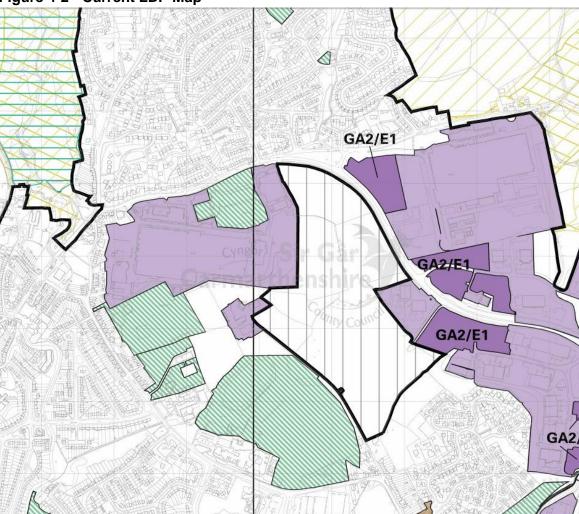
	Planning obligations and conditions will be used (where appropriate) to ensure that new or improved facilities are provided to serve the new development.
Policy EMP2: New Employment Proposals	Proposals for employment developments which are within, adjacent or directly related to the Development Limits of all defined settlements (Policy SP3) will be permitted provided that:
	a) A sequential search has been undertaken identifying that there is no allocation or existing employment site available that can reasonably accommodate the use, followed by there being no suitable land or building (for conversion or re-use) available within the Development Limits, then adjacent to limits, and finally on a site directly related to a recognised settlement;
	b) The development proposals are of an appropriate scale and form, and are not detrimental to the respective character and appearance of the townscape/ landscape;
	c) The development proposals are of an appropriate scale and form compatible with its location and with neighbouring uses.
TR2 Location of Development –	Proposals which have a potential for significant trip generation will be permitted where:
Transport Considerations	a) It is located in a manner consistent with the plans strategic objectives, its settlement framework and its policies and proposals;
	b) It is accessible to non car modes of transport including public transport, cycling and walking;
	c) Provision is made for the non-car modes of transport and for those with mobility difficulties in the design of the proposal and the provision of on site facilities;
	d) Travel Plans have been considered and where appropriate incorporated.
TR3 – Highways in Developments –	The design and layout of all development proposals will, where appropriate, be required to include:
Design Considerations	a) An integrated network of convenient and safe pedestrian and cycle routes (within and from the site) which promotes the interests of pedestrians, cyclists and public transport;
	b) Suitable provision for access by public transport;
	c) Appropriate parking and where applicable, servicing space in accordance with required standards;
	d) Infrastructure and spaces allowing safe and easy access for those with mobility difficulties;
	e) Required access standards reflective of the relevant Class of road and speed restrictions including visibility splays and design features and calming measures necessary to ensure highway safety and the ease of movement is maintained, and where required enhanced;

	f) Provision for Sustainable Urban Drainage Systems to allow for the disposal of surface water run off from the highway.
	Proposals which do not generate unacceptable levels of traffic on the surrounding road network and would not be detrimental to highway safety or cause significant harm to the amenity of residents will be permitted.
	Proposals which will not result in offsite congestion in terms of parking or service provision or where the capacity of the network is sufficient to serve the development will be permitted. Developers may be required to facilitate appropriate works as part of the granting of any permission.
TR4 Cycling and Walking	Developments should, where appropriate seek to incorporate, or where acceptable, facilitate links to the cycle, rights of way and bridleway network to ensure an integrated sustainable approach in respect of any site.
MPP3 Mineral Safeguarding	Planning permission will not be granted for development proposals where they would permanently sterilise resources of aggregates and coal identified within the mineral safeguarding areas (areas of search) identified on the proposals map unless:
	a) The applicant can demonstrate that the extraction of the mineral is impracticable, uneconomic or environmentally unacceptable (including compromising amenity and social considerations); or
	b) The mineral resource has already been extracted; or
	c) The mineral can be extracted satisfactorily prior to the development taking place; or
	d) The development is of a temporary nature and can be completed and the site restored within the timescale that the mineral is likely to be needed; or,
	e) The nature and location of the development would have no significant impact on the potential working of the resource.
EP1 – Water and Environmental Capacity	Proposals for development will be permitted where they do not lead to a deterioration of either the water environment and/or the quality of controlled waters. Proposals will where appropriate, be expected to secure improvements to water quality. Watercourses will be safeguarded through biodiversity/ecological buffer zones/corridors to protect aspects such as riparian habitats and species. Proposals will be permitted where they do not have an adverse impact on the nature conservation.
EP2 Pollution	Proposals for development should wherever possible seek to minimise the impacts of pollution. New developments will be required to demonstrate that they:
	a) Do not conflict with National Air Quality Strategy objectives, or adversely affect to a significant extent, designated Air Quality Management Areas (permitted developments may be conditioned to abide by best practice);
	b) Do not cause a deterioration in water quality;

	<ul><li>c) Ensure that light and noise pollution are where appropriate minimised;</li><li>d) Ensure that risks arising from contaminated land are addressed through an appropriate land investigation and assessment of risk and land remediation to ensure its suitability for the proposed use.</li></ul>
EP3 Sustainable Drainage	Proposals for development will be required to demonstrate that the impact of surface water drainage, including the effectiveness of incorporating Sustainable Drainage Systems (SUDS), has been fully investigated. The details and options resulting from the investigation must show that there are justifiable reasons for not incorporating SUDS into the scheme in
	accordance with section 8 of TAN 15.
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; and
	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.
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).
GP5 Advertisements	Proposals for advertisements (which are subject to planning control) will be strictly controlled and will be expected to comply with the following:
	a) That their design, scale, materials and siting have full regard to the building, structure or land on which they are displayed;
	b) There are no adverse effects on the landscape/townscape or the setting and integrity of the historic environment;
	c) That they do not constitute a hazard to public safety especially when sited on roads;
	d) That they safeguard, and where possible positively enhance, the Welsh language in the County. Regard should also be had to the provisions of Policy SP18 - The Welsh Language.

Proposals for poster hoardings and advertisement signs should not lead to the proliferation or concentration of individually acceptable signs within the countryside.

An extract of the LDP map is shown below in Figure 4-2.



### Figure 4-2 - Current LDP Map

Legend	Кеу	Legend	Кеу
20%	Affordable Housing Viability Targets AH1		Recreation/ Open Space REC1
	Secondary Resource Zone MPP3		Residential Allocation H1
	Existing Employment Areas EMP1		High Specification Aggregate Sandstone and Igneous Rocks MPP3

GA2/h28



Proposed Employment Areas SP7, EMP1



4.2.3. In the current LDP, the site is identified as a mineral safeguarding zone MPP3 and within the affordable housing viability target AH1.

### SUPPLEMENTARY PLANNING GUIDANCE (SPG)

### South Llanelli SPD

- 4.2.4. South Llanelli SPG was adopted in December 2014 with the aim of securing deliverable and high quality development and ensuring that development reflects and respects the character and requirements for the area.
- 4.2.5. In particular, South Llanelli is bound by the Burry Inlet SSSI, SAC, RAMSAR and SPA environmental designations. Water quality issues are known to exist and are known to be failing to meet the Water Framework Directive (WFD) standards for nutrient loading. The need to improve and upgrade certain treatment works as well as implement sustainable solutions as part of the development of South Llanelli is noted.
- 4.2.6. It should be noted that the Burry Inlet and water quality issues will be considered as part of the planning application.

### **EMERGING PLANNING POLICY**

- 4.2.7. On 10th January 2018, CCC resolved to prepare a revised LDP for Carmarthenshire. Once adopted, the Revised LDP will be used as the basis for deciding planning applications and will assist in guiding future investment programmes.
- 4.2.8. At present, however, the production of the Revised LDP has been delayed due to the publication of new targets by Natural Resources Wales which seek to reduce river phosphate levels in special areas of conservation (SAC) across Wales.

4.2.9. In the revised LDP, the site is identified as a proposed employment area.

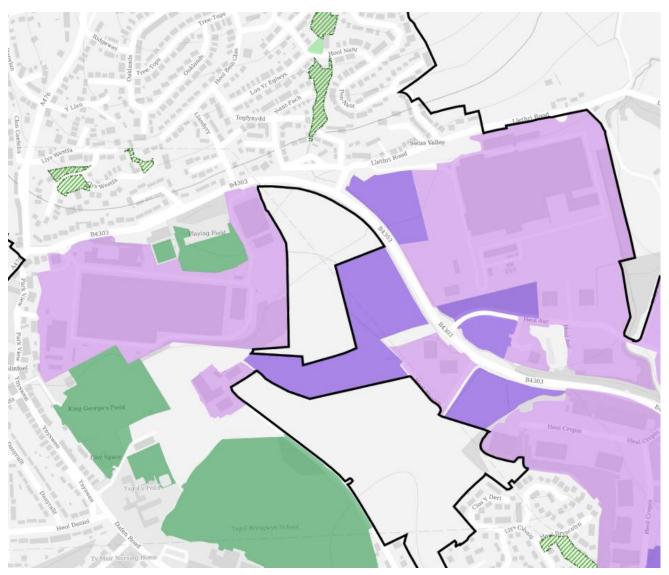


Figure 4-3 - Emerging Local Plan Map

Legend	Кеу	Legend	Кеу
	Proposed Employment Areas		Existing Employment Areas
	Development Limits		Amenity Greenspace
	Outdoor Sports Facility		

### **Draft Nature Conservation and Biodiversity**

4.2.10. The aim of this SPG is to ensure that the provisions of National Policies and that of the LDP are delivered at a local level and that planning applications are accompanied by the correct information that follows best practice guidelines.

### 4.3 PLANNING HISTORY

4.3.1. A planning application search, utilising CCC's planning register search facility, indicates that two planning applications of relevant to the proposed development have been made in proximity to the site boundary. The details of these applications are shown in Table 4-2 below.

Reference	Proposed Development	Address	Decision	Decision Date
S/15955	Three separate light industrial B2 or B8 units to be accessed from the Felinfoel/Llethri road via a new at grade junction	Dafen Development Park, Heol Rhosyn, Llanelli, Sa14 8pd	Withdrawn	04/04/2007
S/18709	Proposed industrial development (B1, B2 & B8) of the land to the west of Llethri Road and the construction of a new principal access road to serve Calsonic Kansei Ltd and the new future industrial development	Dafen Development Park, Llethri Road, Llanelli, Carmarthenshire, Sa14 8pd	Outline Granted	24/06/2008
S/06528	Industrial use falling within classes B1, B2 and B8	LAND AT HEOL RHOSYN, DAFEN, LLANELLI	Withdrawn	10/08/2004
LL/00308	Site development works, highway connection, distribution warehouse and light engineering and transport depot B1, B2, B8	DEVELOPMENT SITE AT LLETHRI ROAD, DAFEN, LLANELLI.	Granted	09/01/2002
S/02089	Proposed industrial units	LAND OFF LLETHRI ROAD, DAFEN, LLANELLI.	Granted	21/10/1999
S/01925	Laying of inert hardcore fill as preparation of site for future use commercial units	LAND BETWEEN LLETHRI ROAD, AND EXISTING CALSONIC WORKS, FELINFOEL, LLANELLI.	Full Granted	28/07/1999
D5/16031	Refurbishment of existing building to EEC standards. Extensions to form by-products and changing areas.	PWLL BACH ABATTOIR, DAFEN, LLANELLI.	Full Granted	13/01/1994
D5/6343	Development of Advance Factories	Dafen, Llanelli.	Approval of Reserved Matters	13/05/1982

 Table 4-2 – Planning Application History



D5/5977 Development for Advance Factory Units	Dafen, Llanelli.	Outlined Planning Permission	29/10/1981
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### 5 DESIGN

### 5.1 PROPOSED DEVELOPMENT

5.1.1. A Proposed Development description is set out below:

"Hybrid Planning Application comprising: Full Planning Permission for the construction of new access roads, associated infrastructure (including drainage) and engineering works to form the plots, plus Outline Planning Permission (all matters reserved - apart from access) for new industrial units on the plots - Class B1/B2/B8 use."

- 5.1.2. The Pre-Application Response received from CCC in September 2023 noted that it would be 'desirable for units to provide active/ interesting frontages and do not 'turn their back' on the road in this regard.' This feedback has been considered during the design evolution by amending the orientation of the units to create active frontages facing the main road (B4303). This will be covered in more detail during the reserved matters stage.
- 5.1.3. A Design Access Statement will also be submitted with the reserved matters application.



#### Figure 5-1 – Outline Layout

### 5.2 DESIGN DEVELOPMENT

### **INCLUSIVE DESIGN PRINCIPLES**

5.2.1. Good design is inclusive design, and inclusive design should be an integral part of the design process which extends from inception, through the planning, detailed design and construction

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phases of a project and into the management practices adopted in use. Inclusive design is about much more than catering for the needs of disabled people. It is about designing and managing an environment in a way that removes the frustration and obstacles experienced by many users including disabled people, older people, children and families.

### **EQUALITY ACT 2010**

- 5.2.2. The Equality Act (EA) 2010 requires due regard to be given to reducing socio-economic inequalities, the elimination of discrimination, harassment, and victimisation based on defined "protected characteristics". These characteristics include: disability, age, gender, race, religion or belief, sexual orientation, pregnancy and maternity and gender reassignment.
- 5.2.3. The EA is about discrimination; it is about people and equality of opportunity it is not only about the physical aspects of a design or a building. There is a duty on the provider of an opportunity or a service to ensure that discrimination does not occur. That discrimination can be direct or in-direct and can manifest itself in several ways including how a physical environment is designed or in the way that opportunities and services are delivered and managed.
- 5.2.4. In relation to the physical environment, the EA does not in itself have any performance-based requirements, nor does it offer advice on technical issues or specifications therefore, it is not possible to have an 'EA compliant' building or product. Designs may be to the latest good practice guidance, but it is the way in which the environment is actually used in practice that may ultimately decide if the antidiscrimination duties imposed under the EA are being met.
- 5.2.5. The measures needed to address discrimination will often vary according to the circumstances of each individual case. The EA lays the foundation for the elimination of discrimination. How that is achieved may depend on several considerations only one of which is the design of the physical environment.

### THE PRINCIPLES OF INCLUSIVE DESIGN

5.2.6. The following five principles have been adopted by the Welsh Government and Design Commission for Wales to describe the overall aim for an appropriately designed, inclusive environment, as per:

### Inclusive design:

- Places people at the heart of the design process;
- Acknowledges diversity and difference;
- Offers choice where a single design solution cannot accommodate all users;
- Provides for flexibility in use; and
- Provides buildings and environments that are convenient, enjoyable and safe to use for everyone.
- 5.2.7. Adopting these five principles in the design process for a development should lead to a physical environment that is:
  - Inclusive so everyone can use it safely, easily and with dignity;
  - Responsive taking into account what people say they need and want;
  - Flexible so different people can use it in different ways;
  - Convenient so everyone can use it without too much effort or separation;
  - Accommodating for all people, regardless of disability, age, mobility, ethnicity or circumstances;
  - Welcoming with no disabling barriers that might exclude some people; and



- Realistic offering more than one solution to help balance everyone's needs and recognising that one solution may not work for all.
- 5.2.8. Inclusive design should not be seen as an extra hurdle to cover. Instead, it should underpin the vision for a scheme and be integrated throughout the design process. As such, the design and access components should be intrinsically linked throughout the DAS.

### THE BENEFITS OF AN INTEGRATED DESIGN APPROACH

- 5.2.9. Adopting an inclusive approach to design offers designers and managers of environments the opportunity to:
  - Be creative;
  - Exceed minimum technical specifications;
  - Find, if needed, individual and innovative design solutions; and
  - Develop buildings, spaces and environments that are not only aesthetically pleasing or make bold statements but also ensure that usability, function and the needs of the end user play a fundamental role in that design and management process.

### 6 PLANNING ASSESSMENT

### 6.1 INTRODUCTION

6.1.1. The proposed development is located off the existing Heol Rhosyn with the new road splitting, with one spur travelling west towards the Prima foods site and the other travelling north to the site boundary. Proposed light industrial units are located to the south of the westbound spur and east of the northbound spur.

### 6.2 CHARACTER

- 6.2.1. Incorporated into the development are a number of natural landscaping features including sustainable drainage features (Swales and attenuation basins) and planting. The layout of the proposed development accommodates the contours of the terrain and the character reflects the existing surrounding land uses.
- 6.2.2. The site is dominated by a large overhead electric line that runs from the north to the south-east corner.

### 6.3 ACCESS AND MOVEMENT

- 6.3.1. The site is accessed via Hoel Rhosyn which provides access to Llethri Road. Hoel Rhosyn has a posted speed limit of 40mph and street lighting provided.
- 6.3.2. The closest bus stop is almost immediately south of the site boundary along the B4304 Cambrian Street. This stop is served by the L3 which travels between Llanelli Bus Station and Pontarddulais Bus Station and the L5 which serves a circular route from the bus station around the northeast of Llanelli. The closest rail station is Llanelli Station which is located 1.3km walking distance from the site and is serviced by Transport for Wales which runs between Carmarthen and Cardiff Central.
- 6.3.3. Personal Injury Collision (PIC) data has been obtained from the Crash Map in the vicinity of the development. The data showed a total of 14 collisions that has occurred during the past five years of which none were classified as fatal, four collisions were classified as serious and the remaining ten were classified as slight in terms of severity.
- 6.3.4. The applicant is submitting a hybrid planning application to develop the site for Commercial use in order of 5,786sqm with a single access priority junction located on Llethri Road.
- 6.3.5. The trip rate for the Development has been calculated using TRICs which is an industry standard approach. The report reviewed the trip generation for three different scenarios depending on the different quantum of floorspace for the Commercial use. The total number of trips associated with worst case scenario is 55 two-way trips in the AM peak and 47 in the PM peak. The trip distribution has been calculated based on the 2011 travel to work census data and the turning proportions of the traffic surveys undertaken.
- 6.3.6. To assess the impact of the development a junction assessment has been carried out on the site access junction for the AM and PM peak periods for the following Scenarios:
  - 2024 Base Year;
  - 2028 Do Minimum and Do Something
  - 2033 Do Minimum and Do Something

- 6.3.7. The assessment showed that the traffic associated with the proposed development can be accommodated on the local highway network in 2028 and 2033 without leading to any of the junction operating close to capacity. The forecast impact of the development is minimal at the priority junction and as such no highway mitigation is required to accommodate the development.
- 6.3.8. The TA concludes that the development proposals are in accordance with national, regional and local policy. The proposals will not likely generate a significant number of trips and modelling demonstrates that the trips would not have a significant impact on the operation and safety of the local highway network.
- 6.3.9. Paragraph 111 of the National Planning Policy Framework states that, "development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". Taking this into account and the conclusions of this TA, there are no reasons why the planning application should be refused on highways and transport grounds, as the impact of the development is not deemed to cause a severe impact.
- 6.3.10. For further information, please refer to the Transport Assessment submitted alongside the planning application.

### 6.4 ENVIRONMENTAL SUSTAINABILITY

- 6.4.1. The proposed development is located in an area of moderate contamination unfit for residential or agricultural use. As a result, the industrial nature of the proposed development is well suited for the site.
- 6.4.2. Further details about the ecological and environmental aspects of the site have been covered within a Sustainability Development Integration Tool (SDIT) Workshop. The SDIT Workshop demonstrates a shared Governments Sustainable Development Objective:

### Prudent use of natural resources – reducing our ecological footprint

- 6.4.3. The development contributes to the objective of prudent use of natural resources the masterplan maximises the net development area, it will adhere to the Welsh Government's low carbon guidance, will use locally sourced construction materials, cut and fill material will be re-used on site, CCC recycling guidance and the waste hierarchy will be adhered to, and flood risk will be managed via SuDS.
- 6.4.4. Further opportunities to contribute to a prudent use of natural resources at future project stages include incorporating low embedded energy systems and net zero carbon buildings, using features such as air-source heat pumps, solar panels or green roofs, the provision of separate recycling facilities as per the new workplace recycling laws, use of a sustainable procurement strategy, and holding a sustainable design workshop during the detailed design stage.

### A Sustainable Natural Environment

- 6.4.5. The development contributes to the objective of a sustainable natural environment as it seeks to protect and enhance biodiversity through a series of ecological enhancements that will be implemented, have no impact on the local landscape or historic assets, and will minimise flood risk through the implementation of SuDs.
- 6.4.6. Further opportunities to contribute to a sustainable natural environment at future project stages include identifying a suitable surface water removal scheme to reduce impact on the Burry Inlet,

production of a Landscape Plan and Green Infrastructure Strategy, holding a sustainable design workshop, use of resilient materials, and promotion of sustainable travel modes.

### 6.5 COMMUNITY SAFETY

6.5.1. The proposed development increases the surveillance and activity within the Dafen area and as such is anticipated to contribute to improved community safety. Additionally, the proposed units will be constructed in accordance with Secured By Design standards and features CCTV and security lighting.

### 6.6 PLANNING POLICY

The Table below sets out the relevant policies from the CCC LDP and how the Proposed Development is in accordance with these.

Policy	Compliance
SP1 – Sustainable Places and Spaces	The proposed development is located within the Llanelli, a growth area as identified within the settlement framework and integrates well with surrounding industrial uses and associated development character. It aims to protect and enhance biodiversity and integrate nature conservation features into the development.
SP2 - Climate Change	The proposed development is designed to be resilient to and minimise the impacts of climate change. It adheres to the waste hierarchy and minimises waste and makes efficient use of resources. Additionally, the proposed development is located in a sustainable location within an existing settlement, reducing the distance local residents need to travel to access these jobs and services.
SP3 - Sustainable Distribution – Settlement Framework	Policy SP3 states that growth and development will be in sustainable locations in accordance with the settlement framework. The settlement framework identifies Llanelli as a growth area. As the proposed development is located within Llanelli, it is in accordance with this policy.
SP7 - Employment – Land Allocations	As stated in Policy SP7, small scale employment proposals on unallocated sites will be permitted where they are in accordance with Policy EMP2. The proposed development's compliance with Policy EMP2 is conveyed below this table. Therefore, the proposed development is in accordance with this policy.
SP9 - Transportation	Through its location within an existing urban area, accessible by active transportation methods. The proposed development aims to improve access to employment opportunities through the provision of high quality light industrial units. Further information is provided in the transport assessment.

### Table 6-1 – Compliance with Local Planning Policy

SP14 – Protection and Enhancement of the Natural Environment	<ul> <li>Section 4.8 of the updated PEA (2023), sets out the ecological enhancement opportunities that are to be included as part of the Proposed Development:</li> <li>Sensitive/low UV lighting during construction and operation so as to keep visual disturbance of bats to a minimum;</li> <li>Planting of a variety of native species as part of landscaping to encourage invertebrates;</li> <li>Creation of additional hedgerows using native species of local provenance;</li> <li>Installation of bird and bat boxes in trees and integral within new structures to provide additional refuge sites for these species' groups;</li> <li>The incorporation of wildflower areas to provide refuge for reptiles, amphibians and hedgehog; and</li> <li>Good horticultural practice should be utilised, including the use of peatfree composts, mulches and soil conditioners and favouring native plants of local provenance in landscaping.</li> </ul> A Habitat Regulations Assessment (HRA) has been prepared to support the planning application. Following Stage 1: Screening, it was identified that the Proposed Development has the potential to result in a Likely Significant Effect on Carmarthen Bay and Estuaries/ Bae Caerfyrddin ac Aberoedd SAC through habitat degradation. As a result, it is recommended that the Proposed Development proceed to Stage 2: Appropriate Assessment to assess its effects on the integrity on Carmarthen Bay and Estuaries/ Bae Caerfyrddin ac Aberoedd SAC through habitat degradation.		
SP17 - Infrastructure	The existing surrounding highway network features sufficient capacity to accommodate the proposed development as outlined in the transport assessment.		
GP1 – Sustainability and High-Quality Design	The area surrounding development is industrial in nature and the proposed development integrates well with this character, using materials appropriate to its use and surrounding development context and will therefore not have a significant impact on the amenity of adjacent land uses, properties, residents or the community. Security of the proposed development has been considered, with secured		
	by design principles integrated into the development. The proposed development will utilise existing highway access and		
	provide sufficient parking onsite, eliminating detrimental impacts on parking as a result of the development.		
	Pre-application consultation with CADW, Dyfed Archaeology Trust and the Heritage Officer confirmed that the proposed development is not anticipated to have a detrimental impact on existing historic and cultural sites or assets.		
	The proposed development will comply with relevant regulations for the utilisation of water and disposal of waste.		

	Highway safety has been incorporated into the design to maximise safety of the transportation network with off-street parking, clear visibility at junctions and pedestrian crossings.
	The proposed development is accessible by active travel modes with segregated pathways from vehicular traffic. Shared use active travel pathways are also located to the north and east of the site.
	As elaborated upon in the CEMP, safe working practices will ensure for appropriate management and eradication of any invasive species on site.
GP2 – Development Limits	It is noted that the proposed development is located outside of the development limits, however as the surrounding urban area is already connected and integrated into the Llanelli urban area the proposed development would promote an effective and appropriate use of land concentrating growth within the Llanelli urban area, and would be a natural extension to the existing built development.
	(Please see Paragraph 6.6.2 for further details).
GP3 - Planning Obligations	If it is identified that Planning Obligations are required, this can be discussed at a later stage.
GP4 - Infrastructure for New Development	As elaborated upon in the Transport Assessment, the surrounding highway network has sufficient capacity to accommodate any traffic generated by the proposed development.
Policy EMP2: New Employment	The current LDP shows that the site falls outside of an Employment Allocation.
Proposals	According to Policy EMP2, a sequential search needs to be undertaken for employment proposals that fall outside of the employment allocation. In addition, the Pre-Application Response received from the LPA on 11 <sup>th</sup> September 2023 advised that a comprehensive case would need to be made to demonstrate that the proposals are demand led and not speculative.
	In response, a Sequential Search has been undertaken which found that none of the allocated sites would be suitable to accommodate the Proposed Development.
	A Demand Study has also been undertaken which concluded that the Proposed Development would provide much needed floor space to the market.
	Furthermore, it should be noted that the Site falls within an Employment Allocation within the emerging LDP.
	(Please see Paragraph 6.6.4 for further details).
TR2 Location of Development – Transport Considerations	The proposed development is located in an area considered acceptable by the settlement framework and existing policies. It is accessible by non car modes of transport, integrating with the existing shared-use active travel pathway adjacent to the site on Llethri Road and a short distance

	from the off-road national cycle network route 47. Existing bus stops are located within a short walk of the site to the north on Llethri Road and all areas of the site are accessible by foot by segregated pavements. Further details on the proposed development's trip generation and travel plans are included in the Transport assessment.
TR3 – Highways in Developments – Design Considerations	The proposed development will incorporate safe routes for bike riders and pedestrians. Public transport is available within a short distance of the site with bus stops to the north on Llethri Road. Appropriate parking and servicing space in accordance with required standard will be provided by the proposed development. Sufficient parking will be provided on-site and will therefore not cause significant harm to the amenity of residents or detrimentally impact the highway network. The proposed development will provide disabled parking and ensures that access for all units is possible by those with mobility difficulties. The internal spine road will be compliant with required access standards reflective of the relevant Class of road and speed restrictions necessary to ensure highway safety and the ease of movement is maintained. In line with Statutory Standards for SuDS in the form of surface conveyance and attenuation features, such as swales, rills, basins and ponds, have been considered and space allocated with the site masterplan to accommodate these features. A sustainable drainage application will be pursued from SAB. As elaborated upon in the Transport Assessment, the surrounding highway network has sufficient capacity to accommodate any traffic generated by the proposed development.
TR4 Cycling and Walking	The proposed development incorporates safe routes for bike riders to access the industrial units. It will link to the existing shared-use active travel pathway along Llethri Road.
MPP3 Mineral Safeguarding	The Proposed Development is located within a Mineral Safeguarding Area, however according to the Geo-Environmental Preliminary Risk Assessment the overall risk posed to future human health receptors is generally moderate to low, dependent on the nature of use the proposed development and zoning of the Site. The Assessment recommends an intrusive ground investigation is required prior to redevelopment of the Site. However, it should be noted that due to the location of the Site relative to surrounding settlements, it is unlikely that this area would be used for mineral extraction which would be in accordance with Policy MPP3 Part A. (Please see Section 6.8 for further details).
EP1 –	The proposed development is not anticipated to have a detrimental impact on the water environment or the quality of controlled waters.

Water and Environmental Capacity	A small watercourse, a tributary of the Afon Dafen, runs through the site. A precautionary method of works taking into account the results of ecology surveys will be provided for the construction of the proposed development to prevent adverse impact on nature conservation.		
EP2 Pollution	The Llanelli air quality management area is located approximately 1.4km to the south-west near the site. The proposed development is not expected to result in a significant impact on air quality in the local area. The capacity of the surrounding road network is sufficient that there will be limited impact on traffic and any associated emissions.		
	The proposed development is not anticipated to have a detrimental impact on the water quality.		
	The levels of noise pollution are predominantly generated by the surrounding road network. The site is located in an area predominantly surrounded by existing heavy and light industrial uses. In addition, the buffer between the existing residential areas 180m to the north and 270m to the south is sufficient that the limited noise generated by the proposed development would not significantly impact the amenity of these residential areas.		
EP3 Sustainable Drainage	In line with Statutory Standards for SuDS in the form of surface conveyance and attenuation features, such as swales, rills, basins and ponds, have been considered and space allocated with the site masterplan to accommodate these features. A sustainable drainage application will be pursued from SAB.		
	Therefore, the proposed development is in compliance with TAN 15.		
EQ4 – Biodiversity	The Site has previously been subject to a PEA in 2021. Following this, targeted surveys were carried out in C1 and C2 in 2022 (Bat, Reptile and Dormouse). Additionally, a Phase 1 Habitat Survey was undertaken in 2023 to classify and map British habitats.		
	Section 4.8 of the updated PEA (2023), sets out the Ecological Enhancement Opportunities that are to be included as part of the Proposed Development:		
	<ul> <li>Sensitive/low UV lighting during construction and operation so as to keep visual disturbance of bats to a minimum;</li> <li>Planting of a variety of native species as part of landscaping to encourage invertebrates;</li> <li>Creation of additional hedgerows using native species of local</li> </ul>		
	<ul> <li>provenance;</li> <li>Installation of bird and bat boxes in trees and integral within new structures to provide additional refuge sites for these species' groups;</li> <li>The incorporation of wildflower areas to provide additional habitat;</li> <li>Invertebrate hotels and habitat piles to provide refuge for reptiles, amphibians and hedgehog; and</li> </ul>		
	<ul> <li>Good horticultural practice should be utilised, including the use of peat- free composts, mulches and soil conditioners and favouring native plants of local provenance in landscaping.</li> </ul>		

	A Habitat Regulations Assessment (HRA) has been prepared to support the planning application. Following Stage 1: Screening, it was identified that the Proposed Development has the potential to result in a Likely Significant Effect on Carmarthen Bay and Estuaries/ Bae Caerfyrddin ac Aberoedd SAC through habitat degradation. As a result, it is recommended that the Proposed Development proceed to Stage 2: Appropriate Assessment to assess its effects on the integrity on Carmarthen Bay and Estuaries/ Bae Caerfyrddin ac Aberoedd SAC through habitat degradation. Green Infrastructure Statement has been prepared. This showcased how the Proposed Development considered the existing green infrastructure, particularly the existing trees across the site. It outlines how mitigation and
	<ul> <li>enhancement measures are proposed for the site, including the planting of new trees, native hedgerows and scrub, and wetland grass.</li> <li>Proposed SuDS features along the main access route through will be planted with a diverse flowering seed mixture, which would benefit ecological features on site as well as providing visual interest. These new features would contribute to the wider green infrastructure of the site and local landscape.</li> </ul>
	Overall, it is considered that the Proposed Development will be in accordance with Wales' and Carmarthenshire's guidance for Green Infrastructure.
EQ5 – Corridors, Networks and Features of Distinctiveness	An updated PEA was prepared in March 2024, it recommends various ecological enhancements including retention/ reinstatement of woodland corridors and species-diverse grassland to increase the value of the Site Biodiversity.
GP5 Advertisements	Any signage located on or adjacent to the units will be compliant with the requirements of policy GP5 and the subject of a minor application prior to their installation before occupation of the units.

### POLICY GP2 – DEVELOPMENT LIMITS

- 6.6.2. Policy GP2 of the CCC LDP relates to development limits. It is noted that the proposed development is located outside of the development limits, as outlined in the LDP, and therefore technically within the 'open countryside'. Notwithstanding this however, when comparing the proposed development against the rationale of the development limits policy it is clear that it would not conflict with any of these.
- 6.6.3. Whilst it is technically outside settlement limits, in reality on site it would not be located in the 'countryside' and would be a natural extension to the existing industrial development off Heol Rhosyn, with urban development to the east, west and north-west. As the surrounding urban area is already connected and integrated into the Llanelli urban area, the proposed development would not result in the coalescence of settlements, ribbon development or a fragmented development pattern. Therefore, the proposed development promotes an effective and appropriate use of land concentrating growth within the Llanelli urban area, and would be a natural extension to the existing built development.

### POLICY EMP2 - NEW EMPLOYMENT PROPOSALS

- 6.6.4. Policy EMP2 of the CCC LDP 2006-2021 requires a sequential search to be undertaken for employment proposals to prove that there is no allocation or existing employment site that can reasonably accommodate the use, followed by there being no suitable land or building (for conversion or re-use) available within the Development Limits, then adjacent to limits, and finally on a site directly related to a recognised settlement.
- 6.6.5. Furthermore, the pre-application advice received from CCC on 11 September 2023 stated that in order for the proposal to be considered acceptable, a comprehensive case will need to be made as to why that the proposed development cannot be accommodated elsewhere.
- 6.6.6. The Pre-application advice also requested that the planning application demonstrates that the proposed development is demand led, not speculative, and that the proposed development is designed to meet identified demand and the units designed in a way to accommodate such demand.

#### Demand

- 6.6.7. A Demand Study for the Proposed Development has been undertaken and is included in Appendix C. The Demand Study concludes that the Proposed Development would provide much needed floor space to the market. The current availability at present in Llanelli, alongside the commentary around recent take up demonstrates that there is sustained demand and an inherent need for employment land, and the resultant developments. These developments must come forward physically and as pipeline to show visibility to meet requirements for floorspace and prevent occupiers considering alternative localities.
- 6.6.8. Proactive land use and bringing forward employment land in locations such as Dafen, are crucial to effectively meet the future demand for industrial space and to prevent loss of employment and input for the local economy through occupiers turning to alternative locations due to lack of floorspace.

#### Allocations in LDP 2006-2021

- 6.6.9. A review of employment allocations in the CCC LDP 2006-2021 has been undertaken to determine site suitability. The search focussed on Llanelli and the wider area, this included sites allocated in Llanelli, Burry Port, Cross Hands, Ammanford, and Carmarthen. The aim for the proposed development is to enhance accessibility and employment across the South-East of Carmarthenshire, and contribute to the holistic regeneration of Llanelli, therefore designated sites beyond this search area were no included in the sequential search.
- 6.6.10. There were a total of 14 sites allocated in the LDP 2006-2021 in this area. These sites were assessed for site suitability using the following parameters:
  - Site size minimum site size of 4ha, this is to provide enough space for the required units, plus required access infrastructure, car parking, and landscaping;
  - Land-use consideration of the existing use of the site, current planning permissions, or development plan allocations. Would its loss be acceptable and does the proposed development accord with the proposed future use;
  - Environmental/ Technical Constraints Is the site the subject of any environmental designations, at risk from flooding or other technical constraints to its development;
  - Compatibility with surrounding uses the possible impact of light industrial development on surrounding uses and, particularly, any impact on residential amenity in terms of its physical



structure, built design, signage, as well as the impact of its operation e.g. noise, lighting, smells etc.;

- Accessibility consideration of whether the site is accessible for future users of the proposed development;
- Access and traffic impact most forms of development will contribute directly and indirectly to traffic impact, both in terms of effect on adjacent roads and impact on the amenity of neighbouring uses as a result of increased traffic;
- Site availability For a site to represent a practical opportunity for light industrial use it needs to be available immediately; and
- Commercial feasibility For a site to be practical, it needs to be commercially viable. This will be determined by the cost of acquiring the site, site preparation, building costs and the rate of return sought by the developer.
- 6.6.11. The table below details the reasons why the sites were not considered suitable for the proposed development.

LDP Site Ref.	Name	Location	Proposed Use Class	Size (ha.)	Reason site unsuitable for proposed development
GA1/E1	Cillefwr Industrial Estate	Carmarthen	B1,B2,B8	4.38	Not large enough to accommodate proposed development. Outside of the Llanelli area therefore, it is not applicable.
GA1/MU1	West Carmarthen	Carmarthen	B1,B2,B8	5.45	Proximity to scheduled monument and large area of site within a conservation area present design constraints. Proposed development is not mixed use so is less suited to this mixed-use allocation. Outside of the Llanelli area therefore, it is not applicable.
GA1/MU2	Pibwrlwyd	Carmarthen	B1,B2,B8	15.5	Would require acquisition of site. Site is allocated as mixed use, masterplanned for predominantly residential use, resulting in significantly less space for commercial, which as a result means the site is too small to accommodate the proposed development. Outside of the Llanelli area therefore, it is not applicable.

### Table 6-2 – Sequential Search Results

LDP Site Ref.	Name	Location	Proposed Use Class	Size (ha.)	Reason site unsuitable for proposed development
GA2/MU9	Delta Lakes	Llanelli	B1	9.78	Site is under development for a mixed use development including a Wellness Resort (Planning Permission: PL/03872)
GA2/E1	Dafen	Llanelli	B1,B2,B8	22.8	Only largest parcel sufficiently large enough to accommodate proposed development. Largest parcel features flooding issues, scheduled monument, destruction of large area of woodland and potential contamination. The topography of the land provides an additional constraint to developing the site.
GA3/E1	Cross Hands Business Park	Ammanford/ Cross Hands	B1,B2,B8	0.79	Site already developed. Outside of the Llanelli area, therefore it is not applicable.
GA3/E2	Meadows Road, Cross Hands	Ammanford/ Cross Hands	B1,B2,B8	1.16	Not large enough to accommodate proposed development. Outside of the Llanelli area therefore, it is not applicable.
GA3/E3	Parc Menter, Cross Hands	Ammanford/ Cross Hands	B1,B2,B8	1.04	Northern parcel developed and southern parcel not large enough to accommodate proposed development. Outside of the Llanelli area therefore, it is not applicable.
GA3/E8	Cross Hands West Food Park	Ammanford/ Cross Hands	B1,B2,B8	8.91	Two of the parcels already developed, high risk of surface water flooding and remaining undeveloped parcels too small to accommodate proposed development. Outside of the Llanelli area therefore, it is not applicable.
GA3/E10	Capel Hendre Industrial	Ammanford/ Cross Hands	B1,B2,B8	4.05	Remaining undeveloped parcels too small to accommodate proposed development. Outside

LDP Site Ref.	Name	Location	Proposed Use Class	Size (ha.)	Reason site unsuitable for proposed development
	Estate, Capel Hendre				of the Llanelli area therefore, it is not applicable.
GA3/E11	Parc Hendre, Capel Hendre	Ammanford/ Cross Hands	B1,B2,B8	11.73	High surface water flooding risk and parcels too small to accommodate proposed development. Outside of the Llanelli area, therefore, it is not applicable as the identified demand is specifically for the Llanelli area.
GA3/E12	Heol Ddu, Tycroes	Ammanford/ Cross Hands	B1,B8	0.34	Site too small to accommodate proposed development. Outside of the Llanelli area, therefore, it is not applicable as the identified demand is specifically for the Llaneli area.
T2/1/E1	Dyfatty	Burry Port	B1,B2,B8	3.28	Site too small to accommodate proposed development.

### Land within the Development Limits

- 6.6.12. As mentioned above the Site is not located within the Development Limits as allocated in the CCC LDP 2006-2021. A search has been conducted of vacant land, within the Llanelli Development Limits, to assess if a suitable alternative site within the Development Limits is available, per Policy EMP2.
- 6.6.13. These sites were assessed for site suitability using the following parameters:
  - Minimum site size of 4ha, this is to provide enough space for the required units, plus required access infrastructure, car parking, and landscaping;
  - Not allocated for development in the CCC LDP 2006-2021; and
  - Not allocated for recreation/open space in the CCC LDP 2006-2021.
- 6.6.14. One land parcel was found to fit these criteria adjacent to the A484, south east of Penallt Road. This site, however, is not considered suitable for the Proposed Development as it is made up largely of woodland with a Public Right of Way (PRoW) running through the centre, to develop the Proposed Development here would result in the loss of both. The land parcel is also within a residential area, with dwellings adjacent, and therefore the Proposed Development of light industrial units could have potential impact to the amenity of these dwellings and would therefore not be appropriate on this land. Additionally, a large portion of site sits in Flood Zone B.



#### Land adjacent to the Development Limits

6.6.15. Policy EMP2 also requires a search of land adjacent to the Development Limits. Given that the Site is located on land adjacent to the Development Limits it was not considered necessary to undertake this search.

#### **Existing employment sites**

6.6.16. The objective of the proposed development is to improve the provision of industrial facilities in order to foster business development in the area. Existing employment sites that are currently on the market have been considered in the Demand Study within **Appendix C**. The Demand Study found that of the 7 vacant units identified within Llanelli 6 of these units were currently under offer, and existing stock is older and lacking in specification, therefore there are no existing options offering new or more modern space that can accommodate strong environmental, social and governance (ESG) credentials.

#### **Summary of Sequential Search**

6.6.17. On analysis of existing employment sites allocated under the existing LDP, it is clear that none of the sites within the locality are of sufficient size or of an undeveloped nature in order to accommodate the Proposed Development. Furthermore, nearly all of the sites would require acquisition which would depend on the site availability and impact commercial feasibility. Additionally, no other sites within development limits, or existing employment sites, were identified that would be suitable to accommodate the Proposed Development.

### 6.7 PRINCIPLE OF THE PROPOSED DEVELOPMENT

- 6.7.1. As previously outlined, Outline permission for proposed use previously granted for a similar employment proposal on the site. Thus, the suitability of the site for an employment use has been confirmed. Additionally, the site is proposed for employment use in the draft local development plan.
- 6.7.2. Furthermore, as outlined in section 3.2, a sequential search was undertaken in accordance with policy EMP2. **Table 6-2** shows the unsuitability of all allocated employment sites in the current adopted LDP.

### 6.8 LAND AND SOIL

6.8.1. A Geo-Environmental Preliminary Risk Assessment has been prepared and submitted alongside this planning application. A summary of the findings has been set out below:

#### The Site

- 6.8.2. The Site is located within an area of low to moderate environmental sensitivity. The Site is reported to be underlain by a thickness of varying Superficial deposits over bedrock of the Pennant Sandstone Formation, classified as a Secondary A Aquifer by the EA.
- 6.8.3. Groundwater vulnerability across the Site is reported to be medium to high towards the north of the Site (Zone A) and medium to low towards the south (Zone B).
- 6.8.4. No ecological, archaeological or environmentally sensitive Sites have been identified within 1km of the Site. Numerous unnamed streams/drainage ditches have been identified across the Site, one of which is classified as Tertiary River thought to contribute to the flow of the Afon Dafen (Primary

River) located ~30m south of the Site. The Site has been identified within an area at risk to both inland and groundwater flooding, and a flood risk assessment for the Site will likely be required due to the area exceeding 1ha.

6.8.5. The Site is located within an area of low radon potential and no protection measures will be required across the proposed development.

### **Contaminated Land**

- 6.8.6. Potential on Site sources of contamination identified within this assessment include:
  - Potential for historical use of pesticides and herbicides across agricultural land (Zone A);
  - Made Ground associated with infilled colliery (Zone B);
  - Gors Colliery (Zone B); and,
  - Mineral Railway (Zone B).
- 6.8.7. Potential off Site sources of contamination identified within this assessment include:
  - Abattoir;
  - Landfill;
  - Engineering Works / Car Radiator Works;
  - Car Body Works;
  - Collieries;
  - Mineral Railway; and
  - Infilled Reservoir.
- 6.8.8. The overall risk posed to future human health receptors is generally moderate to low, but dependent on the nature of use the proposed development (residential/commercial) and zoning of the Site (more contaminative sources present to the south).
- 6.8.9. A lower level of risk would be considered to be posed to future human health receptors across a commercial development due to the likely more extensive use of hardstanding, limited frequency of exposure (during working hours only) and likely better ventilated construction (warehouses etc.). However, in order to fully understand and assess potential risks from contaminative sources, an intrusive ground investigation is required prior to redevelopment of the Site.

#### Recommendations

- It is recommended that a ground investigation is undertaken prior to any development at the Site;
- The geo-environmental intrusive investigation can be combined with an investigation for geotechnical purposes, which would be required to assess the potential geotechnical constraints for the proposed development and for design purposes.
- Further specialist ecological advice should be sought in relation to the positive identification of Japanese Knotweed across the Site. It is understood that WSP is currently completing an ecological assessment of the Site any information/documents associated with ecological assessments of the Site should also be made available to the reader of this report.
- A Flood Risk Assessment is likely to be required for the Site in support of any future planning applications.
- Obtain an updated Consultants Coal Mining Report from the Coal Authority.



### 6.9 LANDSCAPE AND VISUAL

#### Landscape Character

6.9.1. The Site is situated towards the west of the Swansea Bay Landscape Character Area. Key characteristics of the area include:

"Extensive sandy coast is backed by dunes, with lagoons and important coastal heath. Major river estuaries issue within the area, including those of rivers Loughor, Neath and Tawe. Large parts of the area have been built on, with major docks by the Neath and Tawe estuaries. The focus of development is the city of Swansea, Wales' second largest, but also Llanelli, Neath Port Talbot and Pyle. Character is urban and suburban with large housing and industrial estates. Heavy industries and settlement have made use of these strategically important locations, between coalfield and sea, and major ports around Swansea and the Steel Works at Port Talbot are landmark features."

#### **Visual Amenity**

- 6.9.2. The nearest residential dwellings are located on Clos Y Deri, approximately 300m south-east. There are a number of industrial and commercial receptors located within the immediate surrounding area. There are no Public Rights of Way (ProW) that cross the site or located adjacent to it.
- 6.9.3. The Site offers a pleasant visual amenity of views across the grassland visible from the road and ProW 36/88/1. Few residential dwellings benefit from this view.

#### Construction

- 6.9.4. There is the potential for temporary negative visual and landscape impacts as a result of construction activities and any traffic management required causing temporary congestion. In particular, there is the potential for temporary visual and landscape impacts to the nearby ProW, commercial and residential dwellings. The loss of vegetation as a result of the works will result in moderate negative impact on the local landscape character during construction.
- 6.9.5. These impacts would be short-term and temporary. The area of works during construction will be set out to mitigate any potential effects on landscape or visual amenity and this will be managed through the CEMP.

#### Operation

- 6.9.6. The Site is situated in a built-up area, surrounded by predominantly industrial and commercial units. Additionally, the site is mostly screened from the sensitive residential receptors by the industrial and commercial units in place, and by the trees and hedgerows bordering the site.
- 6.9.7. Therefore, whilst the land use of existing grassland will change, there is unlikely to be significant operational impacts on the landscape and townscape arising from the Proposed Development.
- 6.9.8. Please note, further detail will provided within a Design and Access Statement which will be submitted alongside the planning application.

### 6.10 SUSTAINABLE TRANSPORT

6.10.1. The Transport Assessment (TA) states that access to the site is subject to detailed design review and further planning. However, it is evident from the masterplan that the site will be designed to accommodate safe, suitable and convenient access for pedestrians and cyclists. Vehicular access

to the site will be secondary and will be designed to encourage the uptake of sustainable transport modes by making these journeys faster and more attractive.

- 6.10.2. The TA explores the impact of the Proposed Development on the sustainable transport network. The impact on sustainable transport services and active travel infrastructure in the area has been based on the multi-modal trip generation analysis for the Proposed Development.
- 6.10.3. It is the view of the TA that the anticipated trip generation for sustainable modes of travel would be able to be easily accommodated on the exiting sustainable transport network in the vicinity of the site. It is also considered that, as part of any future development, contributions, in line with the level of development, toward improvements to existing services and active travel infrastructure would be provided to ensure that future employees are able to choose to travel sustainably.
- 6.10.4. Traffic during construction will be managed through measures outlined in the CEMP.

### 6.11 **BIODIVERSITY**

### PRELIMINARY ECOLOGICAL APPRAISAL (PEA) 2021

- 6.11.1. A Preliminary Ecological Appraisal (PEA) was undertaken in January 2021 for a larger proposed development on this Site. It was identified in this PEA that habitats present within the Site and the surrounding area have the potential to support the following protected and notable species:
  - Badger
  - Dormouse
  - Hedgehog
  - Reptiles
  - Amphibians
  - Breeding bird species
  - Bats
  - Invasive Non-Native Species (INNS) including Japanese Knotweed.
- 6.11.2. Two Priority Habitats were identified within the Site: hedgerows and neutral grassland.
- 6.11.3. With the revision of scope reducing the area of the Site, bat, reptile and dormouse surveys were carried out between July and November 2022. No confirmed roosts or evidence of bats were recorded on the Site, however it was found that the Site is used for foraging and commuting. The reptile survey confirmed the presence of slow worms and common lizards, and the dormouse surveys confirmed the likely absence of dormice within the Site.
- 6.11.4. There is the potential for negative impacts resulting from the possible spread of Invasive Non-Native Species (INNS) and disturbance to protected and/or notable species during vegetation clearance. All vegetation clearance should follow a method statement / precautionary methods of working to minimise negative impacts would be required and should be supervised by an Ecological Clerk of Works (ECoW).
- 6.11.5. The recommendations and mitigation measures included within the EIA screening note and those set out in the PEA will minimise construction impact at the Site, mitigate for any adverse effects on the baseline of the Site, and enhancing biodiversity by increasing the botanical and invertebrate diversity of the Site. This will promote biodiversity net benefit and contributing to ecosystem resilience within the wider landscape.
- 6.11.6. The following embedded mitigation will be captured as part of the Proposed Development:

- CEMP
- CTMP
- ETC.
- 6.11.7. The biodiversity enhancements and mitigation listed were developed following the 'stepwise approach' advocated in Net Benefit for Biodiversity guidance, of firstly avoiding, then minimising,
- 6.11.8. mitigating and as a last resort compensating for adverse impacts on the environment that occur as part of a development. The assessment of impacts and the development of mitigation also considered the DECCA Framework, a Natural Resources Wales (NRW) tool for evaluating ecosystem resilience based on attributes specified in the Environment (Wales) Act 2016.
- 6.11.9. It is considered that the Proposed Development will achieve a 'Net Benefit for Biodiversity' providing the mitigation and enhancement listed above are implemented as described.

#### **Designated sites**

6.11.10. No designated environmental sites are located within 2km of the site. The nearest designated sites are the Burry Inlet and Loughor Estuary SSSI and the Carmarthen Bay and Estuaries SAC 3.6km to the east. Therefore, no negative impacts on statutory designated sites of non-statutory designated sites are envisaged from the Proposed Development.

#### Agricultural land classification

6.11.11. The DataMap Wales predictive ALC map estimates that the site is comprised of grade 3b agricultural land.

### **UPDATED PRELIMINARY ECOLOGICAL APPRAISAL (PEA) 2023**

- 6.11.12. A historic PEA was carried out in January 2021. The results of an ecological survey are typically considered to be valid for 18 24 months (CIEEM, 2019), and therefore an updated PEA has been undertaken.
- 6.11.13. The Site comprised several fields of agricultural pasture used for sheep grazing, separated by species poor-hedgerows and small pockets of linear broadleaved woodland and areas of dense scrub. Amongst the improved grasslands were areas of marshy grassland and an area of cattle-grazed neutral grassland at the northern end of the Site.

#### **Designated Sites**

- 6.11.14. Five statutory designated sites of international importance were identified within 10km of the Site, and one national statutory nature conservation site was identified within 5km of the Site:
  - The Carmarthenshire Bay and Esturies/ Bae Caerfyrddin ac Aberoedd SAC
  - Burry Inlet SPA and Ramsar;
  - Bristol Channel Approaches SAC
- 6.11.15. The above are hydrologically connected to the Site, therefore a HRSA is to be produced and reviewed in agreement with the LPA and NRW.
- 6.11.16. The Burry Inlet and Loughor Estuary SSSI requires an assessment of the impacts of the Proposed Development on the SSSI is required in order to determine the requirement for SSSI assent.

#### **Priority Habitats**

6.11.17. Priority Habitats were identified within the Site; hedgerows and neutral grassland.

- 6.11.18. Hedgerows should be retained where possible. Where not possible, the destruction of the habitats should be agreed with the LPA, and replaced on at least a 1:1 ratio.
- 6.11.19. In order to confidently rule out the neutral grassland as a Priority Habitat, a follow up visit would be recommended from April to September. In the absence of further surveys, it is recommended that the parcel of neutral grassland habitat is treated as a Priority Habitat, and mitigation and enhancement measures are incorporated into the design under such assumptions.

#### Walkover Survey

6.11.20. The watercourse on Site may be re-routed as part of the Proposed Development, and as such it is recommended that a suitably qualified aquatic ecologist conducts a walkover of the Site to assess its potential to support notable/protected aquatic surveys. As a result of this walkover, further surveys may be required.

#### **Protected and Notable Species**

- 6.11.21. No signs of badger were recorded within the Site but habitat on Site provides suitable areas for sett creation. The grasslands on Site also provided suitable foraging and commuting habitat for badger. A pre-works check for badger is recommended due to the ability of badgers to create new setts in a short space of time.
- 6.11.22. Preliminary avoidance and/or mitigation measures are recommended for hedgehogs, amphibians, breeding birds and bats and in the form of protection/retention of habitats, ECoW and Precautionary Methods of Working. This aligns with the 'Mitigate' principle of the stepwise approach.
- 6.11.23. A programme of translocation for reptiles known to be present within the Site has been recommended.
- 6.11.24. Invasive non-native plant species were recorded on Site. Recommendations have been made for the removal and control of these species.

#### **Ecological Enhancements**

- 6.11.25. Ecological enhancements are also recommended, such as incorporation of a sensitive lighting scheme, retention/reinstatement of woodland corridors and species-diverse grassland and bird and box installation in order to increase the value of the Site for biodiversity. This accords with the 'Compensate' principle of the stepwise approach.
- 6.11.26. For further information, please refer to the Habitat Regulations Assessment (HRA) which has been submitted alongside this planning application.

### 6.12 DRAINAGE AND FLOOD RISK

6.12.1. An Indicative Drainage Strategy and Flood Risk Assessment has been prepared by WSP UK in support of this planning application. A summary of the findings has been set out below:

#### Flood Risk

6.12.2. From the conclusions set out within this document, from a flood risk standpoint the site should be considered suitable for the proposed development. Subject to the mitigation and de-risk measures suggested within the Flood Risk section of this report.

#### Foul Drainage

- 6.12.3. The most sustainable method for the disposal of foul water discharge from the proposed development site is via gravity to the public sewerage system. The nearest public foul sewerage system is located within the site boundaries. DCWW should be consulted prior to a full planning application however at this stage they have confirmed through a pre-planning inquiry that either the 225mm combined sewer to the northwest or the 375mm foul sewer to south of the site would be a suitable point of discharge.
- 6.12.4. DCWW also highlighted that under the Memorandum of Understanding (MoU), a strategy for surface water removal from the public sewerage system is required in order to compensate for the additional foul flows produced by the site. Off-site surface water removal opportunities are currently under investigation as there are none within the site.

#### Surface Water Drainage

- 6.12.5. Based on the required hierarchy, the most suitable method to dispose of surface water runoff from the proposed development is likely to be to the watercourses within and adjacent to the site. Infiltration was deemed an unsuitable method of surface water discharge due to the high water table identified during ground investigation works.
- 6.12.6. Rainwater harvesting serving the proposed roofs may be a viable option for the development plots, these would however need to be used in conjunction with other discharge options. Permeable paving is also envisaged for car parking areas.
- 6.12.7. It is proposed to attenuate the runoff generated from the redeveloped site so that it is discharged at the existing greenfield runoff rate, for key design rainfall events up to and including 100YRP event with 40% allowance for climate change.
- 6.12.8. In line with the Statutory Standards for SuDS in the form of surface conveyance and attenuation features, such as swales, rills, basins and ponds, have been considered and space allocated within the site masterplan to accommodate these features.
- 6.12.9. It should be noted that a Sustainable urban Drainage System (SuDS) application will be submitted to the SuDS Approval Body (SAB) alongside the planning application.

### 6.13 HISTORIC ASSETS

6.13.1. There are no listed buildings located within or adjacent to the site. However, a review of Cadw's search function shows that there are 97 historic assets located within 3km of the site. These are listed within Table 6-4 below:

Historic Asset	Number
Grade I Listed Building	5
Grade II Listed Building	80
Grade II* Listed Building	5
Scheduled Monument	7

Table 6-3 – Summary of Historic Assets

- 6.13.2. As shown in the table above, the closest listed asset is the Church of The Holy Trinity, a Grade II listed building 500m to the west of the site. The nearest scheduled monument is the Penprys Pit Engine House 1.3km east of the site. Two listed parks and gardens are located within 3km. Despite the proliferation of a large number of historic assets within 3km of the site, the majority of these are screened by existing buildings, foliage or terrain from the site.
- 6.13.3. Crucially, the distance of the proposed development from these assets combined with the surrounding industrial development means that the proposed development would not materially impact the setting or character of any of these listed assets.
- 6.13.4. Additionally, comments from the Buit Heritage Conservation Officer and CADW state that designated historic assets are located within 3km of the site, however intervening topography, buildings and vegetation block all views between them. Consequently, they acknowledge that the proposed development will have no impact on the settings of these designated historic assets. Furthermore, the Dyfed Archaeological Trust were consulted and confirmed that no further action is required to safeguard the historic environment.

## 6.14 NOISE

6.14.1. Parker Jones Acoustics Limited (PJA) were instructed to undertake a Noise Impact Assessment (NIA) to assess the impact of noise 'pollution' generated by the proposed development on noisesensitive receptors (residential properties) in the surrounding area, once fully operational (Figure 6-1).

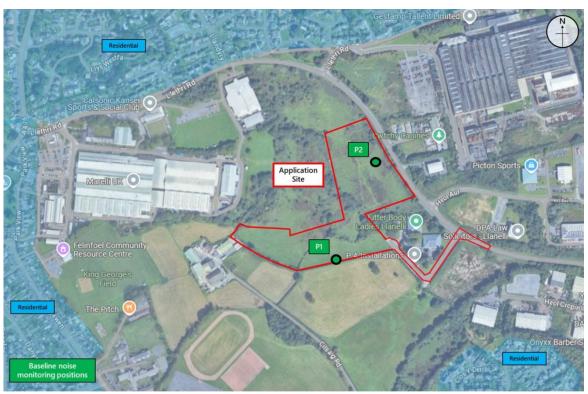


Figure 6-1 - Site Location and Surrounding Area

6.14.2. Therefore, the noise emissions from the proposed development have been assessed following a BS 4142:2014+A1:2019 methodology, based upon existing background noise levels determined by a

baseline noise survey and subsequent predictions of the noise emissions using a detailed 3D noise model – based on an indicative worst-case scenario.

- 6.14.3. In summary, the assessment has been made against minimum background noise levels measured from the survey within the proposed operating hours of 07:00 19:00 Monday to Friday and 08:00 to 17:00 on Saturday, recording a minimum value of 41 dB LA90,15min (see Section 4.0).
- 6.14.4. The predicted rating noise level during the worst-case 1-hour period may reach up to 40 dB at the worst affected residential property, 1 dB under the minimum background level (see Section 5.0).
- 6.14.5. BS 4142:2014+A1:2019 implies that a rating level below the background sound level is generally an indicator that the level of impact is acceptable.
- 6.14.6. These conclusions demonstrate that the proposed development should be able to operate with an acceptably low level of noise impact on local residents.
- 6.14.7. Nonetheless, PJA would agree with typical planning conditions regarding operational times, restrictions of deliveries to certain times, and the implementation of a Noise Management Plan (see Section 6.0), to ensure that the risk of impact remains low and that any complaints are logged and dealt with accordingly.
- 6.14.8. For further information, please see the NIA that has been submitted alongside this planning application.

## 6.15 AIR QUALITY

- 6.15.1. The proposed development is not expected to result in a significant impact on air quality in the local area. The capacity of the surrounding road network is sufficient that there will be limited impact on traffic and any associated emissions.
- 6.15.2. The B1/B2/B8 use of the proposed development is not expected to produce significant emissions.
- 6.15.3. The Llanelli Air Quality Management Area (AQMA) is located 1.4km south-west of the proposed development area.

## 6.16 SOCIO-ECONOMIC

### **Social Progress**

- 6.16.1. The Proposed Development would contribute to the objective of social progress in the following ways:
  - Providing Employment Space;
  - Public Transport Enhancements;
  - Implementing a Travel Plan;
  - Landscaping and Tree Planting on Site;
  - Cycling Facilities;
  - EV Charging Spaces;
  - Disabled Parking;
  - Bilingual Signage; and
  - Community Benefit (incl. procurement, designing out crime and equality workshops).

### Sustainable Economy

- 6.16.2. The Proposed Development would contribute to the objective of a sustainable economy as it would provide units for B1, B2 and B8 use within Llanelli which would increase employment provision and provide economic growth to mee the identified need/ demand. The development would include mixed uses suitable for different economic needs, and the units would offer a range of sizes and layouts to suit different business needs. The site is also located in an already established employment area within Llanelli.
- 6.16.3. Further opportunities to contribute to a sustainable economy at future stages of the development include community benefit clauses:
  - To maximise local procurement opportunities;
  - Develop local supply chains; and
  - Enable local SMEs to compete for construction and supply contracts via a sustainable procurement strategy.

## 7 CONCLUSION

7.1.1. As stated in the planning application form, permission is sought for the following:

"Hybrid Planning Application comprising: Full Planning Permission for the construction of new access roads, associated infrastructure (including drainage) and engineering works to form the plots, plus Outline Planning Permission (all matters reserved - apart from access) for new industrial units on the plots - Class B1/B2/B8 use."

- 7.1.2. This Planning, Design and Access Statement (PDAS) seeks to analyse the development in the context of the requirements of relevant planning policy and guidance (both National and Local) to provide an overarching analysis of the proposals in the context of site specific and general development policies.
- 7.1.3. Section 6 of this PDAS assesses the material matters including the Principle of Development, Sustainable Transport and Biodiversity against relevant policy in both PPW and the Local Development Plan.
- 7.1.4. Overall, there is an identified demand for the proposed development which is supported by several material considerations at both National and Local scale. The Proposed Development accords with the adopted Plan for Carmarthenshire County Council and the significant benefits weigh heavily in favour of this Proposed Development and therefore, it is requested that planning permission is granted.

# **Appendix A**

## **PRE-APPLICATION RESPONSE**

11

# **Appendix B**

## **SCREENING OPINON RESPONSE**

# **Appendix C**

## **DEMAND STUDY**

PUBLIC

wsp

1 Capital Quarter Tyndall Street Cardiff CF10 4BZ

wsp.com



### **Alexandra Einon**

From: Sent: To:	Heledd M Davies <hemdavies@carmarthenshire.gov.uk> 25 February 2025 16:57 clerk@newcastleemlyntowncouncil.co.uk; clerc@ccllangeler.cymru; clerccynwylelfed@gmail.com; clerk@llanfihangelaberbythych.org.uk; Gorslas.CC.Clerk@gmail.com; Dai.Nicholas@llandybiecc.wales; towncouncil@kidwelly.gov.uk; clerk@trimsarancc.org.uk; enquiries; clerkllcc@gmail.com</hemdavies@carmarthenshire.gov.uk>
. Subject:	GORCHYMYN / ORDER - GOSOD TERFYN CYFLYMDER O 40 M.Y.A. / IMPOSITION OF 40 M.P.H. SPEED LIMIT - HTTR/1884
Attachments:	C - HYSBYSIAD CYHOEDDUS.pdf; E - PUBLIC NOTICE.pdf; C - DATGANIAD RHESYMAU.pdf; E - STATEMENT OF REASONS.pdf; C - GORCHYMYN.pdf; E - ORDER.pdf; AA23.pdf; AA24.pdf; AA38.pdf; AA39.pdf; AF29.pdf; AF30.pdf; AG28.pdf; AG29.pdf; AH24.pdf; AH25.pdf; AI24.pdf; L33.pdf; M33.pdf; P11.pdf; S18.pdf; S19.pdf; V35.pdf; W35.pdf; Y37.pdf; Y38.pdf; Z38.pdf

#### Annwyl Syr / Fadam,

Amgaeir fersiynau Cymraeg a Saesneg o Hysbysiad fydd yn cael ei gyhoeddi yn y Carmarthen Journal a'r Llanelli Star ddydd Mercher y 26<sup>ain</sup> o Chwefror 2025, i hysbysu bwriad y Cyngor naill ai i leihau terfynau cyflymder presennol i 40mya, lleihau hyd y terfynau cyflymder 40mya presennol neu i ailgadarnhau'r terfynau cyflymder 40mya presennol.

Amgaeir hefyd fersiynau Cymraeg a Saesneg o Ddatganiad Rheswm y Cyngor dros gyflwyno'r Gorchymyn, y Gorchymyn arfaethedig a'r cynlluniau y cyfeirir atynt yn yr Hysbysiad a'r Gorchymyn.

Fe wnewch nodi bod y cyfnod gwrthwynebu yn dod i ben ar y 19<sup>eg</sup> o Fawrth 2025, felly dylai unrhyw sylwadau yr hoffech wneud i'r Awdurdod gael eu derbyn erbyn y dyddiad hwn fan hwyraf os gwelwch yn dda.

Yn gywir,

Dear Sir / Madam,

Enclosed are the Welsh and English versions of a Notice to be published in the Carmarthen Journal and the Llanelli Star on Wednesday 26<sup>th</sup> of February 2025, publicising the Council's intention to either reduce existing speed limits to 40mph, reduce the length of existing 40mph speed limits or to reaffirm existing 40mph speed limits.

Also enclosed are the Welsh and English versions of the Council's Statement of Reasons for introducing the Order, the proposed Order and the plans referred to in the Notice and the Order.

You will note that the objection period expires on the 19<sup>th</sup> of March 2025, therefore any representations that you wish to make to the Authority should be received by no later than this date please.

Yours faithfully,

**Heledd Davies** 

Cyfreithwraig | Solicitor Gweinyddiaeth â'r Gyfraith | Administration and Law Adran y Prif Weithredwr | Chief Executive's Department

01267 224066

COMMUNITY COUNCIL		
DATE 2 6 FEB 202		
FILE REF.		
PASSED TO	Pol	

#### PUBLIC NOTICE

### THE COUNTY OF CARMARTHENSHIRE (IMPOSITION OF 40 M.P.H. SPEED LIMIT) ORDER 2025

**NOTICE** is hereby given that Carmarthenshire County Council proposes to make an Order under Sections 84(1)(a), 84(1)(c), 84(2) and 124 of, and paragraph 27 of Schedule 9 to, the Road Traffic Regulation Act 1984 (as amended).

The effect of the Order will be:

- (a) To impose a 40 m.p.h. speed limit in the lengths of road briefly described in column 2 of the Schedule to this Notice, but more particularly shown on the plans bearing the unique tile reference numbers specified in column 3 of the said Schedule for each locality described in column 1 thereof, which are to be read in conjunction with the Order and which form part of the same.
- (b) To revoke "The County of Carmarthenshire (Part of the A476 Road, Gorslas Ffairfach) (Imposition of 50 M.P.H. Speed Limit) Order 2011" insofar as the same relates to the proposed lengths of road described in the Schedule to this Notice and more particularly shown on the plans bearing the unique reference numbers specified in column 3 of the said Schedule.
- (c) To revoke "The County of Carmarthenshire (Trimsaran, Kidwelly, Carway & Pontyates) (Imposition of 50 M.P.H. Speed Limit) Order 2012" insofar as the same relates to the proposed lengths of road described in the Schedule to this Notice and more particularly shown on the plans bearing the unique reference numbers specified in column 3 of the said Schedule.
- (d) To revoke "The County of Carmarthenshire (Imposition of 30 M.P.H. Speed Limit) Order 2023" insofar as the same relates to the proposed lengths of road described in the Schedule to this Notice and more particularly shown on the plans bearing the unique reference numbers specified in column 3 of the said Schedule.

(e) To revoke "The County of Carmarthenshire (Class II Trimsaran Road, Trimsaran) (Imposition of 50 M.P.H. Speed Limit) Order 2005" and "The County of Carmarthenshire (Restricted Road and 40 M.P.H Speed Limit) Order 2015 (Cwmbach Road and Heol Trimsaran, Llanelli)" in their entirety.

Full details of these proposals are contained in the draft Order which, together with the plans annexed thereto showing the parts of roads affected and a statement of the Council's reasons for proposing to make the Order, may be examined at Carmarthenshire County Council's Customer Service HWB's, located at:

- Unit 22 St Catherine's Walk, Carmarthen SA31 1GA; and
- No.36 Stepney Street, Llanelli SA15 3TR

during usual office hours.

The documents can also be:

- viewed on Carmarthenshire County Council's website at <u>https://www.carmarthenshire.gov.wales/home/council-democracy/public-notices;</u> or
- obtained free of charge by writing to the Council's Traffic Management Section at Block 2, Parc Myrddin, Richmond Terrace, Carmarthen SA31 1HQ, or by emailing <u>ENTrafficManagement@carmarthenshire.gov.uk</u>.

Should you wish to object to the proposed Order, please send your grounds for objection in writing to Steven Murphy, Head of Law Governance and Civil Services at County Hall, Carmarthen SA31 1JP by the **19<sup>th</sup> March 2025**, quoting the below file reference.

#### Dated this 26th day of February 2025

File Reference: HMD/HTTR-1884 Direct Line: 01267 224066 Email: <u>HeMDavies@carmarthenshire.gov.uk</u> WENDY WALTERS Chief Executive County Hall, Carmarthen

### SCHEDULE

### IMPOSITION OF 40 M.P.H. SPEED LIMIT

<u>1</u> Locality	<u>2</u> Name/Description of Road	<u>3</u> Map Reference
Aber-arad	Class II Road, B4333 Aber-arad to Hermon	P11
Carmel	Principal Road, A476 from The Gate to Johns Terrace	AF29
Carmel	Principal Road, A476 from Johns Terrace to Carmel	AG28 & AG29
Cross Hands	Principal Road, A476 Cross Hands Economic Link Road	AF29 & AF30
Ffairfach	Principal Road, A476 Ffairfach to Carmel	AH24, AH25 & AI24
Hermon	Class II Road, B4333 Hermon to Cynwyl Elfed	S18 & S19
Kidwelly	Class II Road, B4308 Kidwelly to Trimsaran	V35 & W35
Llanmiloe	Principal Road, A4066 Llanmiloe to Laugharne	L33 & M33
Nantgaredig	Class II Road, B4310 Nantgaredig to Felingwmisaf	AA23 & AA24

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Penymynydd	Class II Road, B4308 Penymynydd to Furnace	AA38, AA39, Y37, Y38 & Z38
	5 5 5	

## THE COUNTY OF CARMARTHENSHIRE (IMPOSITION OF 40 M.P.H. SPEED LIMIT) ORDER 2025

The Carmarthenshire County Council ('hereinafter referred to as "the Council"), in exercise of its powers under Sections 84(1)(a), 84(1)(c), 84(2) and 124 of, and paragraph 27 of Schedule 9 to, the Road Traffic Regulation Act 1984 (as amended) ("the Act") and of all other enabling powers, and after consultation with the Chief Officer of Police in accordance with Part III of Schedule 9 to the Act, hereby makes the following Order:-

- This Order may be cited as "The County of Carmarthenshire (Imposition of 40 M.P.H. Speed Limit) Order 2025" and shall come into operation on the XXX day of XXX 2025.
- 2. In this Order:
  - (a) 'Exempted Vehicle' means:
    - (i) any vehicle being used for the purposes described in Section
       87 of the Act;
    - (ii) any vehicle being used for naval, military or air-force purposes and being driven by a person for the time being subject to the orders of a member of the armed forces of the Crown, who is a member of the Special Forces, in response or for practice in responding to a national security emergency, by a person who has been trained in driving at high speeds or for the purpose of training a person in driving vehicles at high speeds;
  - (b) 'Map' means a map comprising the entire County of Carmarthenshire, which is to be read in conjunction with the Order and forms part of the Order;

- (c) '**Map Schedule**' means the collection of Map Tiles listed in the Schedule to this Order, showing, by reference to the Map Schedule Legend, the lengths of road subject to the speed limit imposed by this Order;
- (d) 'Map Schedule Legend' means the Map Schedule Legend endorsed on the Map Tile identifying the lengths of road subject to the speed limit imposed by this Order;
- (e) '**Map Tile**' means a rectangle of a grid overlaying the Map, denoting an area of the County of Carmarthenshire, with each tile having a unique Tile Reference;
- (f) 'Special Forces' means those units of the armed forces, the maintenance of whose capabilities is the responsibility of the director of Special Forces or which are, for the time being, subject to the operational command of that director;
- (g) **'Tile Reference**' means the reference given to each Map Tile, starting in the top-left extremity and increments numerically across the grid horizontally and alphabetically down the grid vertically.
- 3. No person shall drive any motor vehicle, other than an Exempted Vehicle, at a speed exceeding 40 m.p.h. in the lengths of road shown on the Map Schedule specified in the Schedule to this Order.
- 4.
- (i) The County of Carmarthenshire (Part of the A476 Road, Gorslas-Ffairfach) (Imposition of 50 M.P.H. Speed Limit) Order 2011;
- (ii) The County of Carmarthenshire (Trimsaran, Kidwelly, Carway & Pontyates) (Imposition of 50 M.P.H. Speed Limit) Order 2012; and
- (iii) The County of Carmarthenshire (Imposition of 30 M.P.H. Speed Limit) Order 2023

are hereby revoked, insofar as they relate to the lengths of road specified in the Schedule to this Order that are subject to a 40mph speed limit.

5.

- The County of Carmarthenshire (Class II Trimsaran Road, Trimsaran) (Imposition of 50 M.P.H. Speed Limit) Order 2005; and
- (ii) The County of Carmarthenshire (Restricted Road and 40 M.P.H Speed Limit) Order 2015 (Cwmbach Road and Heol Trimsaran, Llanelli)

are hereby revoked in their entirety.

**GIVEN** under the Common Seal of Carmarthenshire County Council on this XXX day of XXX Two Thousand and Twenty-Five.

The Common Seal of	)
CARMARTHENSHIRE COUNTY COUNCIL	)
was hereunto affixed	)
in the presence of:	)

.....

#### **Steven P Murphy**

Head of Law, Governance & Civil Services

### MAP SCHEDULE

AA23	AA24	AA38	AA39	AF29
AF30	AG28	AG29	AH24	AH25
AI24	L33	M33	P11	S18
S19	V35	W35	¥37	Y38
Z38				

### STATEMENT OF REASONS

## The County of Carmarthenshire (Imposition of 40 M.P.H. Speed Limit) Order 2025

The purpose of the Order is:

- a) to reduce existing, higher speed limits to 40mph or to reduce the length of existing 40mph speed limits where they have been identified as being necessary to improve road safety; or
- b) to reaffirm existing 40mph speed limits which are part of wider speed limit orders that are being revoked.

The following proposed speed limit reductions to 40mph have been identified as being necessary to improve road safety, by regulating traffic speeds where there is a history of road traffic collisions or where there is a high risk of road traffic collisions with vulnerable road users:

<u>1</u> Locality	<u>2</u> Name/Description of Road	<u>3</u> Map Reference
Aber-arad	Class II Road, B4333 Aber-arad to Hermon	P11
Carmel	Principal Road, A476 from The Gate to Johns Terrace	AF29
Carmel	Principal Road, A476 from Johns Terrace to Carmel	AG28 & AG29

Cross Hands	Principal Road, A476 Cross Hands Economic Link Road	AF29 & AF30
Hermon	Class II Road, B4333 Hermon to Cynwyl Elfed	S18 & S19
Kidwelly	Class II Road, B4308 Kidwelly to Trimsaran	V35 & W35
Nantgaredig	Class II Road, B4310 Nantgaredig to Felingwmisaf	AA23 & AA24
Penymynydd	Class II Road, B4308 Penymynydd to Furnace	AA38, AA39, Y37, Y38 & Z38

The following locations are lengths of existing 40mph speed limits that are part of wider speed limit orders that are being revoked. The 40mph speed limit will, however, still apply to the following lengths of road:

<u>1</u> Locality	<u>2</u> Name/Description of Road	<u>3</u> Map Reference
Ffairfach	Principal Road, A476 Ffairfach to Carmel	AH24, AH25 & AI24
Llanmiloe	Principal Road, A4066 Llanmiloe to Laugharne	L33 & M33
Penymynydd	Class II Road, B4308 Penymynydd to Furnace	AA38, AA39, Y37, Y38 & Z38

