



Welsh Government

INTEGRATED SUSTAINABILITY APPRAISAL





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1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1. WSP has been commissioned by Welsh Government ('the Applicant') to prepare an Integrated Sustainability Appraisal (ISA) for a proposed employment allocation (hereafter referred to as the 'site') in Dafen, Llanelli. The Site is located at National Grid Reference 252582, 02355 (centre of the site) on Llethri Road (the B4303).
- 1.1.2. The site has been put forward to Carmarthenshire County Council (CCC) for allocation as an employment area within the Second Deposit Revised Local Development Plan (rLDP). CCC must be able to demonstrate the deliverability of all allocated employment sites which are included in its LDP. To ensure the deliverability of each proposed site, CCC has invited applicants to prepare an ISA.
- 1.1.3. This ISA forms part of the Site Assessment Methodology (SAM), a three-stage process designed to assess candidate sites. If a site is considered compatible against the location of future growth presented in the Revised LDP Preferred Strategy, the candidate site is progressed to stages 2a and 2b of the SAM. It is within these stages that an ISA is required to determine whether the site is subject to any major constraints which may impact upon its deliverability.

1.2 PURPOSE OF THIS ISA

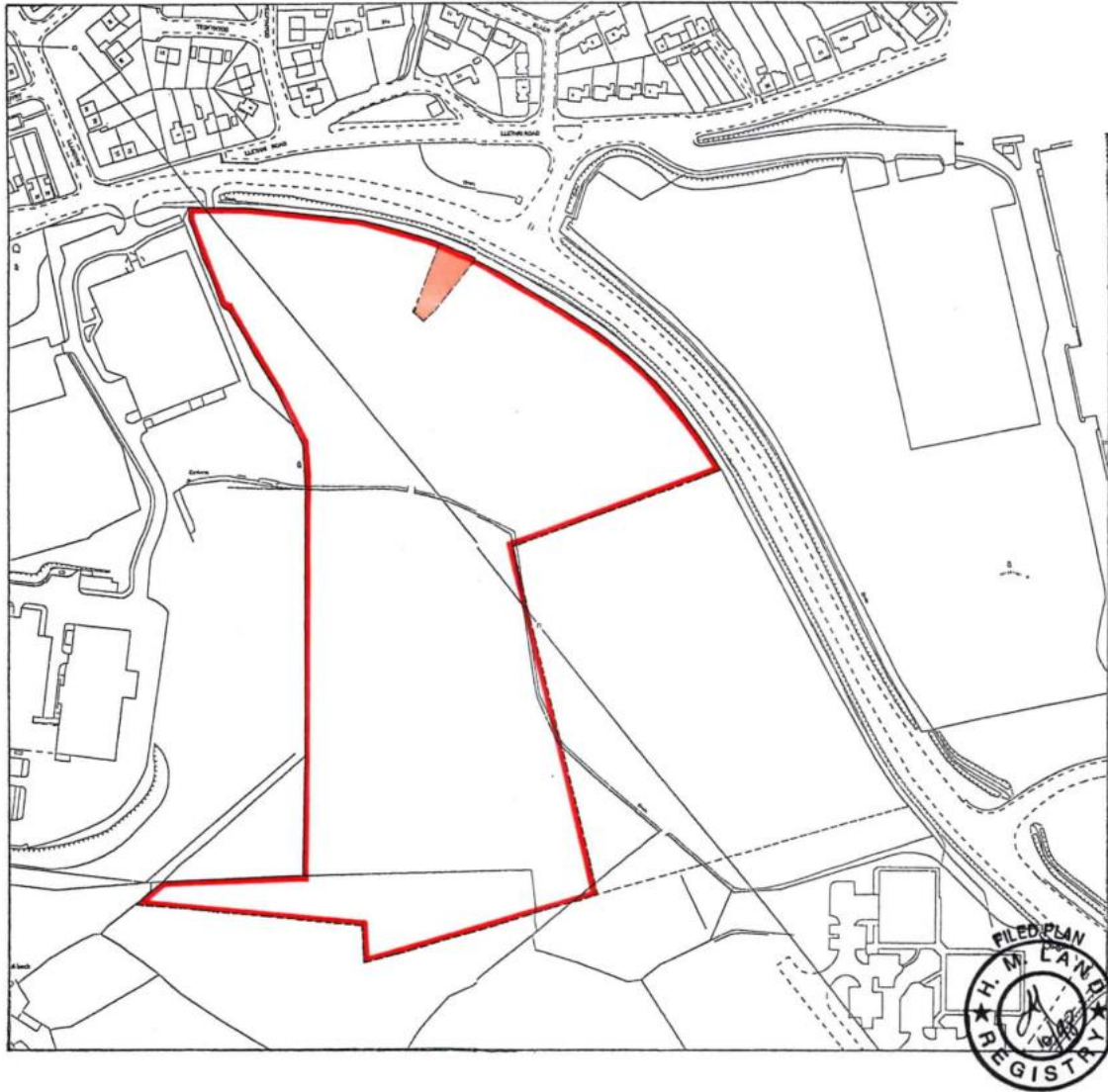
- 1.2.1. This ISA aims to fulfil the requirements of Stages 2a and 2b of the SAM process to determine whether the site can proceed to stage 3. To achieve this, the ISA addresses the questions set out in the Site Assessment Proforma in the ISA: Guide for Promoters of Sites for Development¹ issued by CCC.
- 1.2.2. This ISA has been structured as follows:
 - Chapter 1 provides an overview of the ISA and description of the site and its surroundings;
 - Chapter 2 sets out the Proforma questions and answers; and
 - Chapter 3 provides a conclusion which outlines whether any major constraints have been identified in Chapter 2 and what the next steps should be.

1.3 SITE DESCRIPTION

- 1.3.1. The site is approximately 6 hectares and currently comprises an irregularly shaped parcel of land which consists of several undeveloped, open fields segregated by the presence of overgrown grass and low lying shrubs (scrubland). There are two or three unnamed streams/ditches present throughout the site. **Figure 1-1** indicates the Red Line Boundary of the site.

¹ Carmarthenshire County Council (2023). Revised 2018-2023 Local Development Plan: Integrated Sustainability Appraisal (ISA) Guide for Promoters of Sites for Development. Available online: [isa-guide-for-promoters-of-sites-for-development.pdf \(gov.wales\)](#) [Accessed 01/08/2023]

Figure 1-1 - Site Red Line Boundary



Source: H.M. Land Registry

- 1.3.2. The north of the site is noted to slope in a downwards direction, plateauing out towards the south. Ordnance Survey data² indicates the site is ~45mAOD (above ordnance datum) in the north, sloping down to ~24mAOD in the south.
- 1.3.3. The land is currently owned by Marelli (Calsonic Kansei), which also owns the land which abuts the site boundary to the west.

² Bing (2023). Bing Maps: Ordnance Survey. Available online: [Bing Maps - Directions, trip planning, traffic cameras & more](#) [Accessed: 02/08/2023]

1.3.4. A Site Information Pack³ report covering the site and other adjacent areas of undeveloped land was produced by WSP in June 2021. This report includes details of the history of the site and adjacent areas as follows:

- 1878-1899: Gors Colliery and associated pit and spoil is located in the southern area of the site. A Coal pit (disused) is labelled ~50m east and an old coal level is ~25m west. An air shaft is located south of the site. Bryn-gwyn Pit (Coal) is located beyond this, quarried land is indicated adjacent to the west of the pit. Dafen Works (Iron and Tin Plate) is located approximately 750m - 1000m south of the site. A reservoir is labelled adjacent to the east of the works. A tramway is located within the works.
- 1907-1922: Gors Colliery is labelled as disused. Bryn-gwyn Pit (Coal) is labelled as disused. Stream or river labelled on the western side of the site, is indicated to be flowing south. Bryn-gwyn Pit (Coal) is now a Brick Works. A quarry is labelled ~40m north.
- 1953: Nuffield Engineering Works (comprising three large buildings, with smaller associated buildings around the perimeter) is located ~30m west, specialising in motor car components. The Dafen Works is now labelled 'Blackplate and Galivanted Sheet Works'.
- 1965 – 1987: Gors Colliery (disused) is no longer labelled on site. Dafen Works Site is now labelled as 'Works'. A car body works is located to the east of the site, approximately ~120m from the site boundary, with associated tanks.
- 1972 – 1987: The Nuffield Works is now labelled an Engineering Works for car radiators. A number of tanks are shown on the southern side of the building. An abattoir is ~35m south-west of the site. The reservoir, south of the site, is now partially filled. The brick works is now a number of warehouses. A scrap yard is located next to the former Dafen Works.
- 1992 – 1993: The pit associated with the Gors Colliery is now infilled.
- 2006: The abattoir to the south-west of the site has been extended and adjoins the south-western site boundary.

1.4 SITE SURROUNDINGS

1.4.1. The following land uses surround the site:

- To the north: Llethri Road and residential properties;
- To the east: Llethri Road, with large industrial building beyond;
- To the south: further undeveloped, open fields; and
- To the west: an auto parts and supply manufacturer (Marelli Automotive Systems UK) with associated industrial buildings, Calsonic Kansei Swiss Valley AFC sports club and sports grounds and a food manufacturing supplier.

³ WSP (2021). Site Information Pack – Dafen Development Park – Llethri Road, Dafen.

2 SITE ASSESSMENT PROFORMA

2.1 INTRODUCTION

Stages 2a and 2b of the ISA assessment requires a detailed site assessment which addresses the feasibility of the site by identifying any fundamental constraints. In accordance with the ISA: Guide for Promoters of Sites for Development, a Site Assessment Proforma has been completed as shown in **Table 2-1** below. The table groups together by topic the questions listed in the Site Assessment Proforma shown in the ISA guidance.

- 2.1.1. The Site Information Pack mentioned above has been used alongside a desktop based study of publicly available online resources to populate this Proforma.

Table 2-1 – Site Assessment Proforma

Topic	Question	Answer	Comment
Population and human health	Is the site compatible against the location of future growth presented in the Deposit LDP?	Yes	This site is located in Dafen, an area of Llanelli, which is named as one of three strategic growth areas in the draft Second Deposit rLDP ⁴ (paragraph 9.4). As part of the strategy under ‘Regeneration and the Economy’, regeneration and economic growth is considered “an integral part of its strategic ambitions” (paragraph 9.23) and opportunities to maximise investment and job creation across a range of sectors will be sought.
	Can the site accommodate 5 or more dwellings?	Yes	The site is approximately 6 hectares, therefore the site could accommodate 5 or more dwellings. However, the intended purpose of this site is for commercial use.
	Is the site within, or directly related to an identified settlement in Tiers 1-3 of the LDP Preferred Strategy?	Yes	The site is located within the settlement of Llanelli, a Tier 1 settlement according to the LDP Preferred Strategy. The site itself has not been allocated for development, however it is currently surrounded by development, including areas allocated or used for employment to the west, south and east and residential areas to the north of the site.
	Does the site have access to green space, leisure, and recreational facilities	Yes	There are multiple outdoor spaces within 2km of the site, predominantly comprising outdoor sports areas.

⁴ Carmarthenshire County Council (2023). Draft Second Deposit Local Development Plan. Available online: [Carmarthenshire County Council / Cyngor Sir Gâr - Second Deposit LDP \(oc2.uk\)](https://www.carmarthenshire.gov.uk/cyngor-sir-gar-second-deposit-ldp-oc2-uk) [Accessed 02/08/2023]

	that are within a reasonable distance?		Those within 500m of the site are listed below: <ul style="list-style-type: none"> • Football ground used by Calsonic FC – 100m to the west • King George’s Field (park) – 300m to the west • Outdoor space of Ysgol Bryngwyn School – 250m to the south-west • Four areas of amenity grassland – closest area 250m to the north
	Is the site within reasonable distance to: <ul style="list-style-type: none"> a) Employment provision b) Retail provision c) Other services and facilities 	Yes	The site is located adjacent to existing employment areas (Marelli Automotive Systems UK, a food manufacturer, and an unidentified metal parts manufacturer) as well as proposed employment areas. The closest retail provision is located 2km south of the site.
	Is the site within a reasonable distance to education facilities?	Yes	The closest primary school (Ysgol Y Felin) and the closest secondary school (Ysgol Bryngwyn School) are located 600m south-west of the site. There are seven further education facilities within 2km of the site.
	Does the location and/or scale of the site have the potential to have detrimental impact on Welsh Language?	Unknown	The site is proposed to be allocated for employment but the nature of the commercial/industrial use it will assume is unknown at this stage. It is proposed a Language Action Plan or Impact Assessment is undertaken to determine the impact of an area allocated for commercial use.
Water environment	Is the site located within a flood risk zone?	No	The site is not located within a flood zone The closest area covered by a flood zone is approximately 150m west and is designated Flood Zone B under NRW’s Development Advice Map ⁵ .
	Does the site have an available water connection?	Unknown	As part of WSP’s Site Information Pack report ⁶ , a capacity inquiry was made to Dwr Cymru Welsh Water (DCWW) for potable water supply for an area covering 32,650sqm of industrial development. DCWW responded that in order to determine the availability of a water connection, a Hydraulic Modelling Assessment (HMA) will be completed.

⁵ Natural Resources Wales (2023) Development Advice Map. Available online: [Geocortex Viewer for HTML5 \(cyfoethnaturiolcymru.gov.uk\)](https://geocortex.naturalresources.wales.gov.uk/) [Accessed 01/08/2023]

Ground conditions	Is the site located within or adjacent to a mineral buffer zone?	No	The site is not located within or adjacent to a mineral buffer zone. There are no mineral buffer zones within 2km of the site.
	Is the site located within a Mineral Safeguarding Area?	No	The site is not located within a Mineral Safeguarding Area. There are several Mineral Safeguarding Areas within 2km of the site, with the closest, a Category 2 Sand & Gravel Safeguarding Area located 350m east of the site.
	Does the soil contain high carbon soil e.g., peatlands?	No	The site does not contain high carbon soil as checked on the Peatland of Wales map ⁶ .
	Does the site contain high quality agricultural land?	Yes (very minor)	The majority of the site is classified as Grade 3b agricultural land (moderate quality) ⁷ . A very small area located in the far south-west boundary of the site, approximately 0.03 ha, is classified as Grade 3a agricultural land (good). Land classified grade 3a and above is considered to be the best and most versatile (BMV) agricultural land. Given the small amount of BMV agricultural land present on the site, any development on the site is not expected to result in a significant loss of good quality soil resources.
	Is the site located within or immediately adjacent to any Regionally Important Geological and Geomorphological Sites?	No	The site is not located within or adjacent to a Regionally Important Geological and Geomorphological Site (RIGS). There are also no RIGS within 2km of the site.
Biodiversity	Is the site located within or immediately adjacent to any sites designated for importance to nature conservation?	No	The site is not located within or adjacent to any sites designated for importance to nature conservation. There are also no designated sites within 2km of the site.
	Is the site within or adjacent to a phosphate sensitive SAC catchment?	No	The site is not located within or adjacent to a phosphate sensitive SAC catchment.

⁶ DataMap Wales. (2022). Peatland of Wales Maps. Available online: [Peatlands of Wales Maps | DataMapWales \(gov.wales\)](#) [Accessed 02/08/2023]

⁷ DataMap Wales (2023). Predictive Agricultural Land Classification (ALC) Map 2. Available online: [New map | DataMapWales \(gov.wales\)](#) [Accessed 01/08/2023]

			There are also no phosphate sensitive SAC catchments within 2km of the site.
Cultural Heritage	Is the site located within or immediately adjacent to any Scheduled Monuments?	No	<p>The site is not located within or adjacent to any Scheduled Monuments.</p> <p>However, there are three Scheduled Monuments located within 2km of the site:</p> <ul style="list-style-type: none"> • Section of former Carmarthenshire Railway, Felinfoel – 1.1km to the north-west • Penprys Pit Engine House – 1.4km to the south-east • St David's Colliery – 1.5km to the south-east
Planning	Would development of the site be in contrary to general planning principles?	No	The nature of the commercial use of the development is yet to be determined, however it is not expected to be in contrary to general planning principles.
	Would the development of the site have a detrimental impact on the character and setting of the settlement or its features?	Unknown	<p>The site is located adjacent to areas which are either used for commercial purposes or allocated employment areas. These areas have been landscaped to mitigate character and setting impacts. It is likely this will be adopted for the development of the site.</p> <p>To the north of the site lies a cluster of residential properties. Any changes to the use of this site will alter the landscape and visual amenity experienced by the residents of these nearby properties. However, given the site is adjacent to areas of commercial use, the change to the landscape will not be too dissimilar to its current setting and the visual amenity experienced will also not be too dissimilar.</p> <p>The closest listed building (Grade II Church of The Holy Trinity) is situated approximately 600m west of the site and any views of the site from the listed building is blocked by an industrial building (Marelli UK), therefore any development of the site is not expected to have an impact on the setting of any historical asset.</p>
	Will the proposal involve the re-use of suitable previously developed land and/or buildings?	No	As part of the Site Information Pack, the site and adjacent areas to the south and east were identified as the site of a former colliery. The colliery was labelled as disused in the early twentieth century and in the mid to late twentieth century, various engineering works used this site and adjacent areas. The site also potentially comprises low level agricultural land used for sheep grazing.

			<p>The risk posed to human health as a result of the potential for contaminated land on the site is considered to be moderate to low, subject to further investigations including an intrusive ground investigation.</p>
	Does the site have connections to other infrastructure requirements?	No	<p>A capacity inquiry was made to Western Power Distribution for the requirement of 2.5MVA of electricity. The response concluded that the capacity was available, although infrastructure would be required to connect any development to the existing electricity supply.</p> <p>A separate capacity inquiry was made to Wales and West Utilities (WWU) for a proposed usage of 5,400,000 kWh per annum of gas, which would supply approximately 6000 sqm of industrial floor space. WWU's response concluded that there was capacity within the local network to supply the proposed site, with the nearest connection point being the 250mm diameter main located within the south footpath off Llethri Road.</p> <p>DCWW have acknowledged that there is capacity within the public sewer network to receive foul sewerage flows from the proposed development, however there are currently no connections.</p>
Traffic and transport	Is the site accessible from the existing public highway?	Yes	<p>The B4303 (Llethri Road) adjoins the north and east boundary of the site.</p> <p>Based upon a desktop review, Google StreetMap⁸ shows a gate access onto the B4303 as of January 2009 which indicates that this has been used for access and egress to the site.</p> <p>Whilst access to the site is limited, there is potential for the existing road junction off Llethri Road/Heol Rhosyn to accommodate an access road for employment uses. Heol Rhosyn has the potential to be extended beyond its current point to serve any future developments on this site and the adjoining allocated land in Welsh Government ownership.</p>
	Does the site have an available access point with adequate visibility?	Not currently	There are no current access points.

⁸ Google. 2023. Google Maps. Available online: [Google Maps](https://www.google.com/maps). [Accessed: 02/08/2023]

	Have any significant and evidenced highway issues been identified relating to the site?	Unknown	No significant and evidenced highway issues have been identified, although this cannot be confirmed.
	Does the site have suitable access to public transport and/or active travel route?	Yes	<p>There is a shared use path which extends around the north and east boundary of the site.</p> <p>There are two bus stops within 100m of the north boundary of the site: Llandry bus stop located 100m to the west and Blaen Nant bus stop located 70m to the north.</p> <p>The closest train station is Llanelli located 3.3km south-west of the site.</p>
Air Quality	Is the site within or immediately adjacent to an AQMA?	No	The site is not within or immediately adjacent to an AQMA. The closest AQMA is Llanelli AQMA located approximately 1.6km to the south-west at its closest point.

3 CONCLUSIONS

- 3.1.1. A Site Assessment Proforma has been completed to determine the deliverability of the site under an employment allocation. A desktop based study has been undertaken to identify any significant environmental or social-economic constraints. In response to the questions in the Proforma, the site and its surroundings area was assessed to see if any of the following constraints were present within the site, adjacent to the site, or in some instances, within a 2km study area.
- 3.1.2. The following potential constraints have been identified:
- There is one small area (<0.1 ha) of Grade 3a agricultural land located within the far south-west section of the site but this is not considered to be a significant constraint owing to the size of the area the land covers.
 - There is the potential for contaminated land as a result of historic land uses, although this is not considered to pose a high risk to human health.
 - It is currently unknown whether the existing potable water supply has capacity for any development on this site to connect to it. A Hydraulic Modelling Assessment (HMA) should be completed to determine the availability of a water connection, as recommended by DCWW.
- 3.1.3. Based upon the outcome of this desktop study, no significant constraints have been identified. The site is not located within or adjacent to any features which may affect its deliverability: no designated historical, ecological or geological sites were identified, the site is not located within a flood zone and the site is positioned within proximity to active travel and public transport facilities, educational facilities and other employment provisions.



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