

Our Ref: S20.167
Date: 15 April 2020

Neath Port Talbot County Borough Council
Development Control Section
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Dear Sir or Madam,

Town & Country Planning Act 1990 (as amended)
Change of use of existing buildings to office (Use Class B1) and workshop (Use Class B2) and associated works
Movern Business Centre, Church Street, Briton Ferry, Neath, SA11 2JP
Planning Portal Reference No: PP-08650732

Asbri Planning has been appointed by Lase Ltd. to submit a planning application relating to the change of use of existing buildings to workshop (Use Class B2), ancillary offices (Use Class B1) and associated works at Movern Business Centre, Church Street, Briton Ferry, Neath.

In the interests of clarity, no physical works are proposed by way of the application.

The application was submitted via Planning Portal and comprises the following documents:

Document	Prepared by
Application Forms	Asbri Planning
Cover Letter	Asbri Planning
Site Location Plan	Asbri Planning
Business Details	-
Floor Plan Uses	-

Site Description

The site relates to a regular shaped parcel of land measuring approximately 0.15 hectares and features an arrangement of vacant, dated and contemporary buildings positioned around a central courtyard area. The buildings have been subject to previous extensions resulting in varying building heights.

It is located on the junction of Church Street and Shelone Road and is centred on the following grid coordinates: E: 273728, N: 194237. By virtue of its location in Briton Ferry, the site's surroundings are largely residential in character. Notwithstanding, the recently closed Llansawel Primary School is situated beyond Shelone Road to the east.

The central courtyard area can be utilised for car parking and can accommodate approximately 10 vehicles.

The site lies in a sustainable location with access to an array of services and facilities positioned along the A474 approximately 550m to the east. In regard to public transport, the nearest bus stop to the site is situated along the A474. One service operates regularly from this stop providing users with transport to destinations including Aberavon, Baglan and Neath.

It has been used for a variety of uses over the years. Indeed, it was a munitions factory as Mullens Works, produced Copper Boilers as Metal Box, manufactured trailers and secure cabins as Celtic Trailers. Manufacturing of ultrasonic cleaning equipment took place via Maysonic Ultrasonics and it has also had a retail use via Celtic Trailers. A review of Natural Resources Wales Development Advice Map reveals that the site lies within Flood Zone A, as such, is considered to be at little or no risk of fluvial or tidal/coastal flooding.

A review of the Historic Environment Records reveals that the site lies within proximity to a number of historical assets, the closest of which relates to the Church of St Mary. The Church is designated as a Grade II Listed Building (Ref: 23301) and is screened from the site by residential dwellings and mature trees. As such, the development would not impact the setting of the listed building.

Planning History

A review of Neath Port Talbot Council's online planning register reveals that the site has not been subject to any recent planning applications. Notwithstanding and as aforementioned, the sales particulars detail that the site has previously been used for office (Use Class B1) use.

The Proposed Scheme

In the interests of clarity, no physical works are proposed by way of the application. The only works will be internal where planning permission will not be required in order to create workshop space. The proposal therefore relates only to the use of building.

The site is intended to be used for an array of uses including an automotive repair centre focussing on diagnostic fault investigation and general automotive repairs and servicing which will comprise the workshop uses whilst ancillary office use will also be required. Additional industrial uses comprise laser welded overlays and for laser hardening of industrial components which will also require ancillary office use.

The application is accompanied by a floor plan illustrating which units will be used as workshops (Use Class B2) with ancillary offices (Use Class B1). In addition, the floor plan illustrates that the reconfiguration of some internal rooms will also be required to facilitate the proposed development.

The proposed development will result in a series of economic benefits not only for the applicant but also in the form of job creation of a significant number of full-time jobs. It is likely that the positions will be occupied by local persons.

Planning Policy Framework

Planning Policy Wales

National planning policy is contained within the tenth edition of Planning Policy Wales (PPW), published by the Welsh Government in December 2018. It constitutes guidance for Local Planning Authorities (LPAs) and decision-makers and sets out the Government's planning policies for Wales and how these are expected to be applied.

The planning system is central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage the use and development of land in the public interest which is consistent with key sustainability principles.

Paragraph 3.51 states that:

"Previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development".

Economic Development is defined within PPW as:

"...the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes. 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."

PPW emphasises that the planning system should support economic growth within the context of sustainable development and that economic development should facilitate regeneration and promote social and environmental sustainability.

Paragraph 5.4.2 states

"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. The construction, energy, minerals, waste and telecommunications sectors are also essential to the economy and are 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."

Para 5.4.4 states;

"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."

Technical Advice Notes

PPW is also supported by 20 Technical Advice Notes which provide detailed planning advice which are taken into account by Local Authorities when determining planning applications and preparing Local Development Plans.

Technical Advice Note 23: Economic Development

TAN 23 defines economic development broadly so that it can include any form of development that generates wealth, jobs and income.

Paragraphs 1.2.1 and 1.2.2 highlight that the economic benefits of proposals and market needs should be fully considered when determining planning applications:

"1.2.1 - 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."

1.2.2 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."

Further to the above, paragraph 1.2.5 states:

"Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development."

Neath Port Talbot County Borough Council Local Development Plan

In terms of planning policy, the statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises the Neath Port Talbot County Borough Council Local Development Plan

adopted by the Council in January 2016.

A review of the proposals map reveals that the site is situated within the settlement boundary for Briton Ferry, as such, is positioned in an area where development is normally permitted. Further, it is not subject to any specific allocations or constraints which would prohibit the proposed development.

Accordingly, the following policies contained within the LDP are considered relevant to the proposed application:

Policy Reference	In relation to
<i>Overarching Policies</i>	
SC1	Settlement Limits
<i>Area Based Policies</i>	
SP5	Development in the Coastal Corridor Strategy Area
<i>The Economy</i>	
SP11	Employment Growth
EC4	Protection of Existing Employment Uses

The site is situated within Briton Ferry, as such, within the Coastal Corridor Strategy Area as defined by the adopted LDP. Policy SP5 (Development in the Coastal Corridor Strategy Area) is therefore relevant to the proposal and states:

"In the Coastal Corridor Strategy Area, sustainable growth and development will be promoted to benefit the County Borough as a whole, while protecting and enhancing the area's character and environment. This will be achieved through the following area-specific measures:

- 1. Making provision for the majority of new residential development along the coastal corridor;*
- 2. Allocating Strategic Regeneration Areas at Coed Darcy (Neath) and Harbourside (Port Talbot);*
- 3. Allocating Strategic Employment Sites at Baglan Bay and Junction 38 (M4) Margam;*
- 4. Safeguarding existing employment uses and sites for employment purposes;*
- 5. Promoting mixed use regeneration schemes at Neath Town Centre, Port Talbot Town Centre and Aberafan Seafront;*
- 6. Developing a University Campus at Fabian Way;*
- 7. Managing urban form and setting through the designation of Green Wedges;*
- 8. Improving public and private transport provision including the following schemes:*
 - a) Highway improvements at Baglan Energy Park, Coed Darcy, Ffordd Amazon, and Harbour Way;*
 - b) New interchange and railway station improvements at Port Talbot;*
 - c) Park and Share scheme at Junction 38 (M4) Margam."*

Given that the application relates to establishing the use of the site for office (Use Class B1) and workshops (Use Class B2) resulting in the reuse of a long term vacancy to provide a series of economic benefits including job creation, a pertinent policy to consider is Policy SP11 (Employment Growth) which states:

"Existing employment uses will be supported and safeguarded and new and expanding employment developments will be encouraged through the following measures:

- 1. 96 hectares of land for employment and business purposes will be allocated for development within the Plan period in the Coastal Corridor Strategy Area to meet economic development and employment needs;*
- 2. Additional employment provision will be made within the Strategic Regeneration Areas as part of mixed use, sustainable development in these locations;*

3. *Existing employment areas will be safeguarded for employment uses;*
4. *Premises in existing appropriate lawful employment use will be safeguarded for employment purposes;*
5. *Employment uses will be encouraged in principle within settlement limits;*
6. *In the Valleys Strategy Area, a flexible approach will be taken to employment proposals and 'live-work' units within or immediately adjacent to settlement limits."*

Supplementary Planning Guidance

In addition, the following Supplementary Planning Guidance documents adopted by Neath Port Talbot CBC are considered relevant to this pre-application enquiry:

- Access, Car Parking and Design
- Model Design Guide for Wales Residential Development
- Nature Conservation Planning Guidance

Appraisal

In this section, an appraisal of the proposed development is provided. The following observations set the context for the appraisal:

- The site is situated within the settlement boundary for Briton Ferry.
- The application site comprises vacant buildings. The reuse of the site will therefore avoid a long term vacancy.
- It has been used for a variety of employment (primarily Class B) uses over the years.
- The units have been vacant for some time. A positive use of the site is therefore proposed.
- The application is tailored to the requirements of the incoming tenant. It is not speculative in nature.
- The proposed development will result in a series of economic benefits in the form of 6 jobs.
- The site has previously been used for office use in part.

Principle of Development

The application proposes the change of use of the property in order for it to accord with the requirements of the incoming tenant. No physical works that require planning permission are proposed.

In regard to the principle of development, the site lies wholly within the settlement boundary of Briton Ferry on 'white land' as defined by the LDP Proposals Map, consequently is located in an area where development is normally permitted subject to compliance with pertinent planning policies and is not subject to any specific allocations or constraints.

Given that the proposal relates to the reuse of a vacant and redundant site, it is considered the proposed development will help promote the Welsh Government's objectives of the sustainable use of land and buildings. Furthermore, the site is readily accessible to public transport nodes and local facilities by virtue of its position within close proximity to the A474.

The sales particulars for the site detail that the site has been used as an office (Use Class B1), as such, the proposed application seeks to maintain the use of the site. The proposed development is therefore considered a conforming land use.

The site is situated within Briton Ferry, as such, within the Coastal Corridor Strategy Area as defined by the adopted LDP. As such, Policy SP5 (Development in the Coastal Corridor Strategy Area) is considered pertinent to the application. As detailed above, the buildings have previously been used for a variety of uses including B2 and B1. It is therefore considered that the change of use application to regularise the use of the site will enable the positive reoccupation of the site as part of a previously approved operation (in respect of Use Class) in accordance with criterion 4 of Policy SP5 (Development in the Coastal Corridor Strategy Area).

Similarly, given that the site has been used as an office (Use Class B1) previously and includes provision for workshops (Use Class B2), the proposed development is in accordance with criterion 5 of Policy SP11 (Economic Growth) which aims to encourage employment uses within settlement boundaries.

In light of the above, it is considered that principle of changing the use of existing buildings to office (Use Class B1) and workshop (Use Class B2) and associated works at Movern Business Centre, Church Street, Briton Ferry, Neath is firmly established.

Other Material Planning Considerations

Sustainable Economic Development

Sustainable development is identified in Planning Policy Wales as a golden thread running through the planning system.

The application site comprises vacant buildings. As such, reuse of the site to provide office and workshop provision will make use of previously developed and avoid a long-term vacancy.

Terms have been agreed to purchase the site and convert it to accommodate office (Use Class B1) and workshop (Use Class B2) subject to receipt of a satisfactory planning permission. The proposal is therefore not speculative and should planning permission be granted then it is anticipated that the scheme could be delivered immediately upon receipt of planning permission and discharge of pre-commencement conditions.

It is clear that the proposed development will comprise a sustainable and positive use of a site which is currently serving little purpose. It is considered important from an economic development perspective that such sites are seen to be developed. Finally, the proposed development will result in a series of economic benefits including the creation of 6 jobs.

It is therefore concluded that the proposed development comprises sustainable economic development which will continue to enable sustainable economic growth in an appropriate location which is accessible to local facilities and public transport.

Conclusion

This letter has been prepared on behalf of Lase Ltd. in respect of their application for the proposed change of use of existing buildings to workshop (Use Class B2) and ancillary offices (Use Class B1) at Movern Business Centre, Church Street, Briton Ferry, Neath.

The site is vacant. It lies within the settlement boundary for Briton Ferry, as such, is located in an area where development is normally permitted. The proposal will result in significant economic benefits in the form of the creation of 6 jobs. This comprises a material consideration in the determination of the application.

The proposal accords with national and local planning policy which encourage the reuse of previously developed land and employment uses within settlement limits.

I trust that you will find the application and supporting documents in order. Notwithstanding, if you require any additional information or clarification do not hesitate to contact me on the number above.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'M Gray', with a large, loopy flourish underneath.

Matthew Gray

Associate