

Planning and Design Statement

44 Barg Steam Main

Port Talbot Steelworks, Port Talbot

April 2020

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Client
Tata Steel UK Limited

Our reference
TATT3012

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1. Introduction

1.1 This Planning Statement has been prepared by Turley on behalf of Tata Steel UK Ltd (“Tata”) in support of a retrospective full planning application for the erection of a steam main on land at Port Talbot Steelworks, Harbour Way, Port Talbot, SA13 2NG (“The Site”).

1.2 The formal description of the development (“Proposed Development”) is as follows:

“Retrospective application for the erection of a steam main and connecting pipework including a number of steel structures and new service bridge spanning approximately 65 metres and other associated works and infrastructure.”

Accompanying Documents

1.3 The application is to be read in combination with the full suite of detailed drawings together with a range of technical supporting documents (detailed in the subsequent sections).

1.4 Whilst the supporting documents inform this statement as necessary, it is not the intention to reference each and every conclusion back to the originating document. This approach is taken to allow a clearer assessment of the proposal against relevant planning policy.

1.5 The application package is summarised in **Table 1.1**.

Table 1.1 - Suite of Application Documents

Supporting Document	Drawing Reference / Prepared by
Application Form and Certificates	Turley Planning
Application Fee	Tata Steel
Planning and Design Statement (including Context Photographs)	Turley Planning
Planning Application Drawings	
Site Location Plan	Dwg No. 0000.00.00.11.084 – Rev A
Existing Site Plan	Dwg No. 0000.00.00.11.077 – Rev C
Proposed Layout Plan	Dwg No. 0000.00.00.11.083 – Rev A
West Elevation	Dwg No. 0000.00.00.11.079 – Rev A
East Elevation	Dwg No. 0000.00.00.11.080 – Rev A
North Elevation	Dwg No. 0000.00.00.11.082 – Rev A
South Elevation	Dwg No. 0000.00.00.11.081 – Rev A
Context photographs (Appendix 1 in the Planning and Design Statement)	Tata Steel

Structure of Statement

- 1.6 This Statement describes the proposed development for which planning permission is sought and demonstrates the scheme's compliance with national and local planning and environmental policies.
- 1.7 This Planning Statement is structured as follows:
- Section 2 – Site Context
 - Section 3 – The Proposal
 - Section 4 – Planning Policy Context
 - Section 5 – Planning Assessment
 - Section 6 – Summary and Conclusions

2. Site Context

- 2.1 This section of the Planning Statement provides a brief description of the application site and the existing Port Talbot Steelworks.

Site Location and Surroundings

- 2.2 The Site is located within the administrative boundary of Neath Port Talbot County Borough Council (NPTCBC). Port Talbot Steelworks occupies an area south of Port Talbot and the Port of Port Talbot. The overall location of the site within the wider Steelworks is indicated on **Figure 2.1** below. Photographs of the site are included as **Appendix 1**.

Figure 2.1: Application Site



- 2.3 The Site sits towards the northern end of the Port Talbot Steelworks and is located immediately above the disused Port Talbot Railway. It is adjacent to the existing Margam A, B and C power plant buildings and is to the west of the land for development under Development Consent Order ('the Port Talbot Steelworks Generating Station Order 2015'). The wider Port Talbot Steelworks site area is approximately 1,133 hectares. The Site is located towards the north within the Steelworks site and the Site area is approximately 0.43 hectares.
- 2.4 The wider Steelworks site is encircled, to the east by Harbour Way (A4241) (approximately 400 metres east) and the Port Talbot Docks and Tidal Harbour to the north and west of the site. Access to the site is provided from Harbour Way onto a number of private roads to the east of the site, where the access gates and barriers are located. The access is used for employees, vehicles associated with the Steelworks operation, and visitors to the Steelworks.

- 2.5 The site falls within Flood Zone B (areas known to have flooded in the past). The whole of Port Talbot Steelworks (including the site) is located within a mineral safeguarding area.
- 2.6 The site is not located within a national landscape designation. There are no internationally or nationally designated sites for nature conservation within the Site. The Site does not contain any listed buildings or scheduled ancient monuments and does not lie within a conservation area.

Existing Steam Main Operation

- 2.7 The 44 barg steam main is a key operational asset that connects the five 44 barg steam producing boilers with three turbo blowers, six turbo alternators, five turbine driven water pumps and two emergency oil pumps which are situated in the three existing Power Plant Buildings, Margam A, B and C. It is fundamental to the ongoing safe operation of the steelworks as it provides:
- Motive power for wind generation providing the “cold blast” required for Blast Furnace operation;
 - Motive power for electricity generation for partial self-sufficiency utilising gases arising from the steelmaking process including for controlled plant shutdown in case of disconnection from external grid; and
 - Motive power for pumps and supplying critical cooling water to Blast Furnace No.5. It supports 11 barg Process Steam main via two let-down valves and pass-out from one of the Turbo alternators.
- 2.8 The majority of the existing main was constructed in the 1950’s and had reached the end of its operating life, as have some of the supporting structures. The repairs and bridge has therefore been critical to the operation of the steelworks.

3. The Proposal

- 3.1 The proposal seeks full planning permission for the retention of the 44 Barg Steam Main. The full description of development is set out below:

“Retrospective application for the erection of a steam main and connecting pipework including a number of steel structures and new service bridge spanning approximately 65 metres and other associated works and infrastructure.”

- 3.2 The proposal includes a steam main which replaces the function of an existing steam main that has reached the end of its useful life. The steam main has two connection points within Margam C building that will be used to connect to the new Turbo Alternator currently under construction and a proposed future Boiler. The pipe bridge structure is also to be utilised to carry some of the new High Voltage cabling from the new Sub Station to the various existing substations on plant. **Figure 3.1** shows the bridge from ground level at the North end of the bridge, looking south. Further photographs are provided as **Appendix 1**.

Figure 3.1: View of the Bridge from ground level at the North end of the Bridge, looking South



- 3.3 The pipe bridge is a services bridge and has no permanent means of access. There are access ladders and suitable guard railing installed onto the foundation plinths for gaining access to isolation valves and cable marshalling boxes. Access to the bridge is via site roads, with both ends on the edge of existing car parking areas. The bridge passes over the railway embankment with 8.5m clearance from top of rails.
- 3.4 The bridge sits on concrete foundations that rise above ground level, providing protection from vehicle strikes. The bridge is 65m long, 17.6m high and 3m wide.

The Need for the Development

- 3.5 The majority of the existing main was constructed in the 1950's and had reach the end of its operating life, as had some of the supporting structures. Therefore, a new steam

main has been constructed, including the installation of a new pipe bridge crossing two site roads and the Ogmore Vale Embankment. The new main is made from a material whose creep range is outside the operating range of the steam main, removing one mode of degradation, making it suitable to last the next 60 years or more.

- 3.6 The bridge and other external supporting structures are constructed within the industrial context, being located within a steelworks. Where the bridge is seen, it is seen against the heaviest industrial site in Wales and will not be seen by the public. The new bridge is needed for the function of the steelworks and due to its context, planning permission should not be refused. **Figure 3.2** shows the bridge, image taken from scaffold tower at Margam C looking South towards the bridge.

Figure 3.2: View of Bridge from Scaffold Tower at Margam C looking South towards the Bridge



Pre-Application Engagement

- 3.7 The new steam main bridge crosses the disused Port Talbot railway, owned by Network Rail. Prior to the submission of this application, detailed discussions have taken place between Tata Steel and Network Rail regarding the scheme and no issues have been raised.

Environmental Impact Assessment

3.8 Following an extensive review of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, the site does not constitute EIA development, as follows:

- The proposed development falls within Schedule 2 Column 1 of Table 3 for Energy Industry. Row B refers to the 'industrial installations for carrying gas, steam and hot water'.
- The relevant threshold for this type of development to constitute EIA development is that the area of works exceeds 1ha.
- The proposed development covers 4,270sqm and therefore falls significantly below this threshold.

4. Planning Policy Context

Introduction

- 4.1 Legislation requires that planning applications are determined in accordance with the Development Plan, unless material considerations indicate otherwise. This section summarises the relevant planning policy context for the proposed development and relevant material considerations.

Development Plan

- 4.2 The current 'Development Plan' for the site consists of the Neath Port Talbot County Borough Council Local Development Plan 2011 - 2026 (NPTLDP), which was adopted in January 2016. This is the primary consideration in the determination of planning applications.

Material Considerations

- 4.3 Other material considerations include:
- Planning Policy Wales (PPW) (Edition 10, December 2018)
 - Technical Advice Notes, including:
 - TAN 11: Noise (1997)
 - TAN 12: Design (2016)
 - TAN 15: Development and Flood Risk (2004)
 - TAN 23: Economic Development (2014)
 - Supplementary Planning Guidance, including:
 - Pollution (October 2016)
 - Design (July 2017)
- 4.4 The relevant planning policies are listed below in this section under different headings. The full list of relevant planning policies to the proposal are included within **Appendix 2**.

Site Specific Policies

- 4.5 The NPTLDP sets out the policies specific to Port Talbot Steelworks. The Steelworks is identified as an existing employment area and local policy restricts uses on the site to protect the employment function of the Site (Policy EC 2). The uses are restricted in the existing employment areas (Policy EC 3), the most relevant for the Steelworks includes uses within classes B1, B2 and B8 and ancillary facilities or services which support and complement the wider role and function of the primary employment use.

Policy Considerations

- 4.6 A number of policy themes are identified below that set out relevant planning policies and supporting text that are considered to be of relevance to this planning application.

Environmental Health

- 4.7 One of the objectives for the NPTLDP is to value the environment. The Plan includes policies that aim to address air quality issues, minimise noise generating and polluting activities (Objective 16 and Strategic Policy 16). It also seeks to reduce people's exposure to the determinants of poor health and states that development should not have an unacceptable adverse effect on health, biodiversity and local amenity (Strategic Policy 2 and Policy EN 8).
- 4.8 PPW sets out the environmental components of placemaking, including reducing overall pollution, high quality and built to last, reducing environmental risk and clean air (Chapter 6).
- 4.9 TAN 11 provides guidance on noise and how the planning system can be used to minimise the impacts of noise without placing unreasonable restrictions on development. It states that in industrial development the character of the noise should be taken into account as well as its level.

Minerals

- 4.10 The NPTLDP sets out criteria in which development will be permitted in mineral safeguarding areas. This includes where it can be demonstrated that there is an overriding need for the development, or the scale and location of the development would have no significant impact on the working of the resource (Policy M1).

Employment and Infrastructure

- 4.11 Another objective of the NPTLDP is to promote a sustainable economy. It highlights that the Steelworks is one of the largest employers and existing employers will be supported and safeguarded (Strategic Policy 11). The use on these sites will be restricted to uses ancillary facilities or services which support and complement the wider role and function of the primary employment use (Policy EC 3).

Design

- 4.12 The NPTLDP states that proposals will be expected to demonstrate high quality design (Policy BE 1) and sets out criteria relating to the design of proposals and states that development will be permitted if it does not compromise the safe, effective and efficient use of the highway network (Policy TR 2).
- 4.13 PPW, TAN 12 and the Design SPG also provide guidance on promoting good, sustainable design through the planning system.

Transport

- 4.14 The NPTLDP provides details on transport infrastructure and states that disused or redundant railway infrastructure will be safeguarded and development that would inhibit the re-opening or the re-use for transport purposes will be resisted (Policy TR 3).

Sustainable Development

- 4.15 PPW sets out that the primary objective is to ensure that the planning system contributes towards the delivery of sustainable development that previously developed land should be used in preference to greenfield where it is suitable for development (Paragraph 1.2 and Paragraph 3.51).

Development and Flood Risk

- 4.16 TAN 15 provides advice on matters including the use of development advice maps to determine flood risk issues. The guidance sets out how to assess the flooding consequences of proposed development.

Policy Summary

- 4.17 To summarise, a number of key policy themes emerge as being relevant to the proposed development, as follows:
- Achieving sustainable developments which ensure efficient re-use of brownfield sites and consider economic, social and environmental issues.
 - Safeguarding and supporting existing employment uses in Wales and Neath Port Talbot in particular. The Steelworks is recognised as one of the largest employers in the region.
 - Proposed uses which support the overall function of the employment area will be supported.
 - Design quality is an internal part of the planning and decision making process. Consideration should be given to the surrounding character and context when developing the design proposals. The area's industrial heritage and steel industry is recognised as an existing part of the context.

5. Planning Assessment

- 5.1 This section provides an assessment of the proposed development with reference to the planning policy context provided in previous sections, and other relevant considerations. This focuses on the principle of development and the suitability of the site to accommodate the proposed development and the specific issues including environmental considerations, suitability and deliverability of the application.

Principle of Development

- 5.2 As noted in Section 3, the proposed development is a steam main which replaces the function of an existing steam main that has reached the end of its useful life. The existing main was constructed in the 1950's. The new main is required for the continued operation of the steelworks. A new steam main has been constructed in material that will make it suitable to last the next 60 years.
- 5.3 The operation of the Steelworks plays a fundamental role in the economy and employment of Port Talbot and the surrounding area. There is no direct link between the proposals and employment. However, the proposals make a positive investments into the sustainable operations of the Steelworks and supports its continued operation as a strategic employer in the region. This is supported by local planning policy (Policy EC 3).
- 5.4 The bridge is an established and acceptable use in this location and an integral part of the steelworks operation. The principle of development is acceptable. The bridge is strongly supported by prevailing policy as an appropriate use in this location, within an existing heavy industrial site.

Design

- 5.5 The following sub-sections explain how the proposed development has been considered and designed to consider the proposed function. The proposals are set within the existing industrial context of the Steelworks, therefore the design is considered acceptable given the location.

Layout

- 5.6 The proposed layout has been designed to maintain the operation of the Steelworks and is therefore considered acceptable. The steam main connects the five 44 barg steam producing boilers with three turbo blowers, six turbo blowers, six turbo alternators, five turbine driven water pumps and two emergency oil pumps which are situated in the three existing Power Plant Buildings, Margam A, B and C.

Use and Amount

- 5.7 The use and amount of development proposed is appropriate to the context. The proposal includes a steam main bridge which replaces the function of the existing steam main. It is fundamental to the ongoing safe operation of the steelworks as it provides:

- Motive power for wind generation providing the “cold blast” required for Blast Furnace operation;
- Motive power for electricity generation for partial self-sufficiency utilising gases arising from the steelmaking process including for controlled plant shutdown in case of disconnection from external grid; and
- Motive power for pumps supplying critical cooling water to Blast Furnace No. 5.

5.8 The new steam main has two connection points within Margam C building that will be used to connect to the new Turbo Alternator and a proposed future Boiler. The pipe bridge structure is also to be utilised to carry some of the new cabling from the new Sub Station to the various existing sub stations on plant. The steam main is required for the continued operation of the Steelworks and is consistent with the other uses in the vicinity of the Site. The steam main is therefore a supported use in the context of the industrial Site and considered an acceptable development.

Scale

5.9 The bridge is 65m long, 17.6m high and 3m wide. The proposed height is in keeping with the surrounding structures and buildings. The bridge also passes over the railway embankment with 8.5m clearance from top of the rails. **Figure 5.1** shows the scale of the bridge in relation to the surrounding structures.

Figure 5.1: Image taken from ground level at the South end of the Bridge, looking North



Materials and Appearance

- 5.10 The bridge and other external support structures are constructed from S355 structural steel beams, columns, angles and plate that have been galvanised for corrosion protection.
- 5.11 The bridge sits on concrete foundations that rise above ground level, providing protection from vehicle strikes. Other supports sit on concrete foundations. The pipe is

P11 alloy steel pipe with man-made mineral fibre insulation clad with galvanised steel sheet. Cabling is contained using galvanised steel ladder racking.

- 5.12 The design of the bridge has been considered to meet the operational requirements of the steelworks. The design of the proposals complement the existing Steelworks and provide a bridge which is in keeping with the surrounding area. As the proposals are only seen via a private access only road, it will only be viewed in the context of Steelworks, the proposals are in compliance with the local and national planning policy.

Highways and Access

- 5.13 The pipe has no permanent means of access. There are access ladders and suitable guard railing installed onto the foundation plinths for gaining access to isolation valves and cable marshalling boxes. During construction and installations of cabling, designed scaffold access will be utilised. Access to the bridge is via site roads, with both ends on the edge of existing car parking areas. There will be no access to the public.
- 5.14 Local planning policy supports high quality design as long as it does not compromise the highway network. As demonstrated, the proposals have an 8.5m clearance from the top of the railway bank (the bridge passes over the railway embankment) and it has also been agreed with Network Rail.

Environmental Considerations

- 5.15 Local planning policy requires development to not have an unacceptable adverse effect on health and/or amenity. The proposed development is required for the continued operation of the steelworks. In regards to the environmental considerations (such as noise and air quality) the proposed development will not give rise to any environmental impacts. Therefore, the development complies with the local policy.

Summary

- 5.16 The above assessment demonstrates that the site is suitable for the proposed development. It has delivered a steam main bridge which makes it suitable to last for the next 60 years or more. The delivery of this structure supports the overall operation of the Steelworks.
- 5.17 The proposal is set within the existing industrial context and sits against the blast services, water coolants and other structures of similar materials, it is a supported use within the context of this industrial site and maintaining its operation.
- 5.18 There is no direct link between the proposals and employment, however the proposals make a positive investments into the sustainable operations of the Steelworks and supports its continued operation as a strategic employer in the region.
- 5.19 The proposal accords with local and national policy and the overall benefits of the development weight in favour of granting planning permission for the proposed development.

6. Summary and Conclusions

6.1 The forgoing analysis in this Statement demonstrates that the proposed development:

- Provides a steam main bridge that is fundamental to the ongoing safe operation of the Steelworks.
- Replaces the function of the existing steam main bridge to a new main made from material suitable to last the next 60 years or more.
- Through the continued operation of the Steelworks, contributes to the positive investment into the sustainable operations of the Steelworks as a strategic employer.
- Is designed to reflect the industrial context, it does not have a direct impact on public views. Where the bridge can be seen, it is seen within the heavy industrial context and therefore considered acceptable.

6.2 The assessment in this Statement demonstrates that there are no adverse impacts associated with the steam main bridge. When considered against the Development Plan for Neath Port Talbot and national planning policy, the benefits of the scheme outweigh any negative impact.

6.3 It is considered that the proposed development in this location, is acceptable. Accordingly, planning permission should be granted.

Appendix 1: Context Photographs

Figure 1.1: Taken from a scaffold tower at Margam C, looking South towards the bridge



Figure 1.2: Ground level, North East of the Bridge looking West



Figure 1.3: Ground level, North East of the Bridge looking West



Figure 1.4: Ground level, North of the Bridge, looking South



Figure 1.5: Ground level, North of the Bridge, looking South



Figure 1.6: Ground level, North of the Bridge, looking South



Figure 1.7: Ground level North West of the Bridge, looking East



Figure 1.8: Ground level North West of the Bridge, looking East

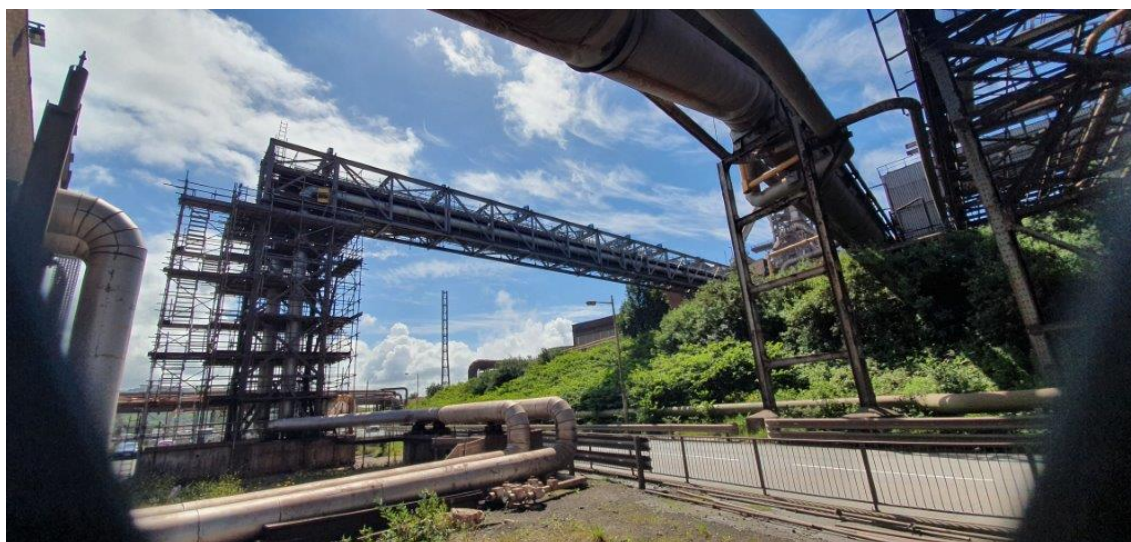


Figure 1.9: Ground level at the South end of the Bridge, looking North



Figure 1.10: Ground level at the South end of the Bridge, looking North



Figure 1.11: Ground level at the South end of the Bridge, looking North



Figure 1.12: Ground level at the South end of the Bridge, looking North



Appendix 2: Planning Policy Context

Neath Port Talbot County Borough Council Local Development Plan

1. The NPTLDP was adopted in January 2016 and covers the plan period to 2026. The following policies and supporting text are considered to be of relevance to this planning application.
- Environmental Health**
 2. **Paragraph 2.2.1** states that one of the objective themes for NPTCBC is to value the environment. **Objective 16** aims to address air quality issues and minimise noise generating and polluting activities.
 3. **Strategic Policy 2 (Health)** is to reduce people's exposure to the determinants of poor health and provide an environment that encourages healthy, active and safer lifestyles.
 4. **Strategic Policy 16 (Environmental Protection)** states that air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures:
 - Ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels;
 - Giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable;
 - Ensuring that developments do not increase the number of people exposed to significant levels of pollution.
 5. **Policy EN 8 (Pollution and Land Stability)** states that proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk such as air, noise and light pollution, contamination, land instability and water pollution will not be permitted.
 6. **Policy EN 9 (Developments in Central Port Talbot Area)** requires developments which could breach air quality objectives during their construction phase in this area to comply with a Construction Management Plan, submitted to the Council as part of the planning process.
- Minerals**
 7. **Policy M1 (Development in Mineral Safeguarding Areas)** sets out a number of alternative criteria to be met in order for development to be permitted within these areas. This includes demonstrating that there is an overriding need for the development, or that the scale and location of the development will have no significant impact on the working of the resource.
- Employment**
 8. **Paragraph 2.2.1** states that one of NPTCBC's overall objective themes is to promote a sustainable economy.

9. **Paragraph 1.1.7** highlights that the employment base in Neath Port Talbot is focused along the coastal corridor, where Tata Steel and the Council are the largest employers.
10. **Strategic Policy 11 (Employment Growth)** states that existing employment uses will be supported and safeguarded and new and expanding employment development will be encouraged.
11. **Policy EC 2 (Existing Employment Areas)** states that in order to protect the employment function of the County Borough's employment areas, uses on particular sites will be restricted in accordance with Policy EC 3. This includes EC2/11 Tata Steelworks, Margam.
12. **Policy EC 3 (Employment Area Uses)** states that within existing employment areas, unless otherwise specified and where appropriate, uses will be restricted as follows:
 - *"Uses within classes B1, B2 and B8;*
 - *Ancillary facilities or services which support and complement the wider role and function of the primary employment use;*
 - *Commercial services unrelated to class B.*

Developments will be required to demonstrate that proposals do not cause any adverse impacts on the overall function of the employment area and neighbouring commercial and residential properties, the proposal can be sustainably justified in this location and is appropriate in scale and form to the role and function of the employment area."

13. **Paragraph 5.2.22** specifically references Tata Steel and states that within such heavy industrial sites, the types of ancillary facilities/services that would be appropriate would be different to that of general employment estates or parks. Ancillary services that may be appropriate here could include:
 - Energy and power generation
 - Waste recovery and transfer proposals not contained within the traditional B use classes.
14. Such uses will be favourably considered where the proposals would support the overall function of the employment area and not cause any adverse impact on the area for employment purposes or unacceptable harm to the amenity of neighbours.

Design

15. **Policy TR2 (Design and Access of New Development)** confirms that proposals will only be permitted where they can meet all of the relevant criteria. This includes not compromising safe and efficient use of the highway network, and providing safe access arrangements to allow safe manoeuvring of service vehicles.
16. **Policy BE 1 (Design)** states that all proposals will be expected to demonstrate high quality design and take account of the natural, historic and built environmental context. The policy sets a range of criteria to be satisfied (where relevant) for development to be permitted. This includes:

- Complementing and enhancing the appearance of the site and area in relation to the proposal's scale, height and massing, elevational treatment.
 - Respect the site's context within the local landscape.
 - Utilise appropriate materials and landscaping/screening, where appropriate.
 - Resources are used as efficiently as possible.
17. In relation to respecting the heritage of the area, **paragraph 5.5.3** states that the key character of most of the area derives from its industrial heritage, including the large scale steel industries since the 20th century.

Transport

18. **Policy TR3 (Safeguarding of Disused Railway Infrastructure)** states that disused or redundant railway infrastructure will be safeguarded and development which would inhibit the re-opening or the re-use for transport purposes will be resisted, unless it can be demonstrated that such re-opening or re-use is not realistic or necessary.
19. **Policy TR4 (Safeguarding Freight Facilities)** states that proposals that would inhibit the use of the above for transport purposes will be resisted, unless it can be demonstrated that the use of the route for movement of freight is not realistic or necessary.
20. **Paragraph 5.4.30** states that the Port Talbot Tidal Harbour, Port Talbot Docks, Neath River wharves and a number of rail connections and sidings are major freight facilities operating in the County Borough and offer the potential for increased and more varied use.

Other Material Considerations

Planning Policy Wales

21. Planning Policy Wales (PPW) (Edition 10) was adopted in December 2018 and sets out the land use planning policies of the Welsh Government against which development proposals should be assessed. It is supplemented by a series of Technical Advice Notes.

Sustainable Development

22. **Paragraph 1.2** states that "the primary objective of the PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales".
23. **Paragraph 3.51** notes that previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.
24. **Paragraph 5.8.3** seeks to ensure that sustainable building design principles are integral to the design of new development.

Environmental Health

25. **Chapter 6** of the PPW sets out the environmental and cultural components of placemaking, including reducing overall pollution, high quality and built to last, reducing environmental risk and clean air.
26. **Section 6.7** relates to air quality and soundscape. In relation to the location of commercial and industrial development, **Paragraph 6.7.15** states that potentially polluting development includes commercial, industrial, energy and agricultural or transport infrastructure. Such development should be located in areas where there is low potential for public exposure, or where its impact can be minimised.
27. **Paragraph 6.7.16** sets out considerations in making planning decisions for polluting development including:
- Location, including the reasons for selecting the chosen site itself;
 - Impact on health and amenity;
 - Effect of pollution on the natural and built environment and the enjoyment of areas of landscape and historic and cultural value;
 - Impact on groundwater and surface water quality;
 - Effect on biodiversity and ecosystem resilience;
 - The risk and impact of potential pollution from the development, insofar as this might lead to the creation of, or worsen the situation in, an air quality management area, a noise action planning priority area or an area where there are sensitive receptors; and
 - Impact on the road and other transport networks.

Employment

- 6.4 When assessing the Sustainable Benefits of Development (**Paragraph 2.25**), the key factors in relation to economic considerations include contribution the development would make to achieving wider strategies and contribution the economic activity will have to wider policy goals.

Design

- 6.5 **Paragraph 3.3** states that to achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management and its relationship with the surrounding area.

Technical Advice Notes

28. The Technical Advice Notes (TANs) are supplementary documents to Planning Policy Wales and each TAN provides detailed planning advice on a different subject. The TANs relevant to the proposed development are listed below.

TAN 11: Noise

29. This TAN was adopted in October 1997 and provides guidance on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development.
30. Noise generating development should not cause an unacceptable degree of disturbance. In the case of industrial development the character of the noise should be taken into account as well as its level.
31. The guidance states that measures to mitigate the impact of noise should be proportionate and reasonable and may include, but are not limited to:
- Engineering: reduction of noise at point of generation, containment of noise generated, protection of surrounding noise-sensitive buildings.
 - Layout: adequate distance between noise source and noise-sensitive building or area, screening by natural barriers, other buildings or non-critical rooms in a building.
 - Administrative: limiting operating time of noise source, restricting activities allowed on the site, specifying an acceptable noise limit.

TAN 12: Design

32. TAN 12 was adopted in March 2016 and provides advice on promoting good, sustainable design through the planning system.
33. The guidance promotes early consultation and consideration of design with the local planning authority and sets out the approach for delivering good design. Guidance is provided on a range of design elements, including, but not limited to access, character, sustainability, movement and context.

TAN 15: Development and Flood Risk

34. This TAN was adopted in July 2004 and provides advice on matters including the use of development advice maps to determine flood risk issues.
35. The guidance sets out how to assess the flooding consequences of proposed development and action that can be taken through development plans and development control (management) procedures to mitigate flood risk when planning for new development.

TAN 23: Economic Development

36. This TAN was adopted in February 2014 and provides guidance on the role of land use planning in economic development.
37. The guidance states economic land uses include the traditional employment uses as well as retail, tourism and public services. Economic land uses also include agriculture, energy generation and other infrastructure.

Supplementary Planning Guidance

Pollution

38. The Pollution Supplementary Planning Guidance was adopted on 27 January 2016 and gives information about pollution issues in Neath Port Talbot. The document sets out the relevant matters that will need to be taken into consideration when developments are being planned. Margam/Taibach Air Quality Management Area is located to the east of the site as shown in the figure below.

Figure 2.1: Margam/Taibach Air Quality Management Area



39. The guidance builds upon Policy EN8 and 9 of the NPTLDP and provides the full details in relation to air, noise, light and water pollution.

Design

40. This guidance was adopted in July 2017 and is a material consideration in the decision making process.
41. With regards to the Steelworks, the SPG recognises that the large scale steel industry forms a key characteristic of the area's heritage and character. The Steelworks forms part of the landscape and views across the area.

42. Section 4 of the SPG focuses on the implementation of Policy BE1 of the NPTLDP. This sets out a number of key principles which should be considered by developers in the design of the proposal, including:
- Defining and identifying where and how development proposals have regard to distinctiveness and enhancing the character of the surrounding area.
 - Demonstrating how local context and character has been addressed, including the wider landscape, townscape and heritage where appropriate.
 - Explaining and justifying the use of materials and landscaping within the development.
 - Demonstrating that the proposals do not adversely affect highway safety or residential/community amenity.
 - Demonstrating that the planning, layout and orientation makes efficient use of land, taking account of the site's constraints.

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