

MARGAM GREEN ENERGY PLANT

PLANNING APPLICATION FOR THE ERECTION OF A NEW EQUIPMENT STORAGE BUILDING AT MARGAM GREEN ENERGY PLANT, MARGAM, PORT TALBOT

PLANNING STATEMENT

JULY 2020

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Building Layout and Elevations	2774-01-02 Rev A
South Elevation with Margam Green Energy Plant	2774-01-03 Rev A
East Elevation with Margam Green Energy Plant	2774-01-04 Rev A
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APPENDICES

Appendix A Flood Consequences Assessment

Appendix B Drainage Assessment

Appendix C Coal Mining Risk Assessment

Appendix D Landscape and Ecological Management Plan

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1.0 INTRODUCTION AND SCOPE OF THE APPLICATION

1.1 Introduction and Background

1.1.1 This Planning Statement has been prepared in support of a planning application under Section 70 of the Town and Country Planning Act 1990 (as amended) by Margam Green Energy Ltd ('the Applicant') for the erection of a new equipment storage building ('the Proposed Development') at the Margam Green Energy Plant ('MGEP').

1.1.2 The Proposed Development comprises the construction of a new building which would be used for the storage of spare process and mechanical equipment used for the operation of the MGEP.

1.1.3 MGEP became fully operational in June 2019. The building is required to provide storage for spare equipment in a secure environment to ensure the biomass facility can be maintained to the highest standards and repaired in a timely manner should breakdowns occur. This is considered essential to the efficient running of the MGEP. Currently spares are stored offsite thereby impacting on speed of replacing damaged equipment and thus affecting the efficiency of this renewable energy plant.

1.1.4 This Statement provides information to assist the Council to determine the application for the Proposed Development. The remainder of this section describes the scope of the planning application, the application site and the pre-application consultation undertaken with the Neath Port Talbot Council. Section 2.0 provides a summary of the planning history. Section 3.0 describes the Proposed Development and Section 4.0 provides a brief summary of the environmental effects of the development. Section 5.0 provides a planning appraisal of key relevant development plan policies and other material considerations. Finally, Section 6.0 provides conclusions in respect of the acceptability of the Proposed Development in planning terms.

1.2 Scope of the Planning Application

1.2.1 The planning application comprises the following main elements:

- Application Form;
- Drawings:

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- Location Plan 2774-01-01
 - Building Layout and Elevations 2774-01-02
 - South Elevation 2774-01-03
 - East Elevation 2774-01-04
 - Landscape Plan 2774-10-05 Rev B
 - Planning Statement;
 - Flood Consequences Assessment;
 - Surface Water Drainage Assessment;
 - Coal Mining Risk Assessment
 - Landscape Ecological Management Plan; and
 - Statutory Planning Application Fee

1.3 The Site and Its Context

- 1.3.1 The Proposed Development would be located within the boundary of the existing MGEP site to the south of the main plant (the Site). The location of the building is shown on drawing 2774-01-01.
- 1.3.2 The MGEP is located off Harbour Way, Margam, Port Talbot, approximately 300m to the west of the A48, which runs northwards into Margam alongside the M4 from junction 38. To the south of the MGEP is an area of wet woodland. To the west, beyond the MGEP, lies an area of marshy grassland and dense scrub and woodland. A major drainage watercourse called the Upper Mother Ditch is also located to the west, with a minor ditch running to the immediate south of the plant. The edge of the urban area of Margam is located to the north of the MGEP beyond the newly constructed Peripheral Distributor Road (Harbour Way) and a series of sports pitches.
- 1.3.3 The wider development area is set within an industrialised landscape with the Western Bioenergy Plant (which became operational in March 2008) and the British Oxygen Co (BOC) located beyond the wet woodland to the south. The London to Swansea railway line is situated 500m to the west, with the steelworks immediately beyond that to the west and stretching to the north-west.

1.4 Pre-Application Consultation

- 1.4.1 A request for pre-application advice in respect of the Proposed Development was submitted to Neath Port Talbot Council on 21st February 2020. An online meeting was held on the 2nd April 2020 to discuss the proposals and agree the scope of the application.

2.0 PLANNING HISTORY

2.1.1 The MGEP was originally approved on appeal (ref: APP/Y6930/A/10/2135473) on the 8th March 2011. A revised planning application was subsequently approved on the 8th October 2014 (ref: P2014/0705). This permission was subject to a series of planning applications 'amending' the approved development. The most recent of these being an application under Section 73 of the Town and Country Planning Act 1990 ('S73 application') which was granted in February 2017, ref. P2016/0949. This is the principal operative permission for the MGEP.

2.1.2 In addition there are two other permissions governing development within the MGEP site:

- P2015/0992 for the waste wood storage building; and
- P2016/0895 for the administration building.

2.1.3 Full details of the relevant planning permissions and the discharge of planning conditions are provided in Appendix E of this document

3.0 THE PROPOSED DEVELOPMENT

3.1 Introduction

3.1.1 This Section of the Planning Statement provides a description of the Proposed Development.

3.2 The Proposed Development

3.2.1 The development involves the construction of a new building adjacent to the southern boundary of the MGEP. The dimensions of the proposed building are 40m x 10m with a height of up to 7m. In total the proposal seeks to create an additional 400 sqm of floorspace.

3.2.2 The inside of the building would comprise a large storage area, with necessary racking systems and sub-division for the storage of the various spare parts and equipment required for the maintenance of the facility. There would be a small administration room which would be used for the logging and recoding of parts stored within the building. No welfare facilities are proposed as the building would not be permanently manned.

3.2.3 The building would not be externally lit and there would be no windows.

3.2.4 As described in the introduction, the building would be used to store spare equipment and parts for the operation of the MGEP. The requirement for the building was identified following the completion of the construction and commissioning phases of the MGEP. The operator originally tried to accommodate an equipment storage area within the main building but there was not sufficient safe storage area available. Currently spares are stored offsite thereby impacting on speed of replacing damaged equipment and thus affecting the efficiency of the plant.

3.2.5 If a suitable storage building is not provided onsite then it would be necessary for spares to be permanently stored in an offsite location, as is the case at present. This has a number of negative implications. The most important of which is that it would continue to result in logistical and operational reliability concerns as immediate access to spare parts and equipment is required to ensure the plant continues to operate in an efficient manner, with any shutdown periods within the plant minimised. The MGEP

also has permanent security presence. Many of the parts that would be stored are made to order overseas and have long manufacturing and delivery times. As such security is a key requirement for the operator.

3.2.6 The building would be designed to reflect the appearance of the main MGEP building with a composite flat panel cladding system and a parapet around the roof structure to screen the pitched roof behind. The building panels would be coloured light grey with a dark blue surround, as per the main MGEP building.

3.2.7 A new drainage scheme would be provided which would operate independently of the approved drainage strategy for the wider site. This drainage scheme is described in further detail below.

3.3 Environmental Impact Assessment

3.3.1 The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (hereafter referred to as 'the EIA Regulations') prescribe the types of development for which EIA is mandatory (Schedule 1 development) and others which may require assessment if they are likely to give rise to significant environmental impacts (Schedule 2 development).

3.3.2 The Proposed Development does not fall under any of the development types listed in Schedule 1 of the Regulations and is therefore not Schedule 1 development. At less than 400m² in area the building does not fall within any of the main development categories within Schedule 2 of the Regulations. However, the building does form a 'change or extension' to the MGEP and as such is captured by paragraph 13 of Schedule 2.

3.3.3 The applicable threshold and criteria for paragraph 13 is that the '*development as changed or extended may have significant adverse effects on the environment*'.

3.3.4 In considering the potential for significant adverse effects, either alone or in combination with the operation of the existing plant, the following points are considered relevant:

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- The development is not located in a 'sensitive area' in terms of the EIA Regulations.
 - The new building would not alter the operation of the facility and as such would have no impact on the emissions from the main plant in terms of air, noise or water either alone or in combination with the main plant.
 - The development would not give rise to any additional traffic movements, in fact it would reduce movements associated with the transport of parts and spare equipment.
 - The development is significantly smaller than the main MGEP and has been designed in a way that it would fit with the remainder of the development. As such it would not have any significant adverse landscape or visual impacts.

3.3.5 On the basis of the low sensitivity of the site from an environmental perspective, its small scale and the lack of any adverse in-combination effects with the main facility it is considered that the development would not give rise to any significant environment effects. As such it would not constitute EIA Development.

4.0 ENVIRONMENTAL EFFECTS

4.1 Introduction

4.1.1 A Flood Consequences Assessment, Drainage Assessment, Landscape and Ecology Management Plan and a Coal Mining Risk Assessment have been completed to support this planning application. These are contained in Appendices A, B, C and D respectively. A summary of the findings of these reports are provided under the following sub-headings.

4.2 Flood Consequences Assessment

4.2.1 A Flood Consequences Assessment (FCA) accompanies this application (Appendix A). The Proposed Development would be located within Flood Zone B. Technical guidance, TAN 15, which supplements Planning Policy Wales, only requires an assessment of flooding consequences to be provided in parts of Zone B where flooding has been identified as a material consideration to allow for localised problems.

4.2.2 Flood Zone mapping from Natural Resources Wales shows the Site as lying outside Flood Zones 2 and 3 which are areas at high risk of flooding. It also noted that no flooding issues have been identified at the Site since it was constructed, including during the exceptional weather event in February 2020. As such there is no explicit requirement for a FCA to be provided with the application.

4.2.3 However, the MGEP Site was classified as falling within Zone C2, defined as an area at a high risk of flooding, at the point the previous application for the MGEP was submitted. FCAs were therefore submitted in support of the previous applications for the MGEP. For this reason an updated FCA has been provided in support of this application.

4.2.4 The FCA confirms the low flood risk classification at the Site and that the proposed ground floor level of the spares equipment building has been set at a minimum of 6.79m AOD to comply with the requirements of Condition 17 of permission P2016/0949 (i.e. the current operative permission for the MGEP).

4.3 Drainage

- 4.3.1 A Drainage Assessment has been submitted with this application (Appendix B). A sustainable drainage system (SuDS) is proposed which would comprise a surface water attenuation feature located to the east of the building which would discharge surface water at a controlled rate into the existing drain located to the south of the development area. The attenuation feature would provide adequate storage for a 1 in 100 year storm event plus a 30% allowance for climate change. The drainage strategy provides additional detail on the proposed drainage system, including calculations for the proposed attenuation system. No foul water system is required for the development.

4.4 Coal Mining Risk Assessment

- 4.4.1 The Site lies within a 'Development High Risk Area' as defined by the Coal Authority. As such a Coal Mining Risk Assessment accompanies this application (Appendix C). The report concludes that the risk to development on the site from abandoned shallow mine workings is negligible.

4.5 Landscape Ecology Management Plan (LEMP)

- 4.5.1 The approved landscape drawing (AX-1065-PL-01 REV F) under permission ref: P2016/0949 indicates the proposed Site as being landscaped with grass and dense scrub/wet woodland. Clearly this landscaping would not be possible should the development proceed.
- 4.5.2 A revised Landscape Plan (2774-10-05 Rev B) and LEMP (Appendix D) accompanies this application. The Landscape Plan and LEMP include a revised landscape design for the wider MGEP site. The LEMP and the accompanying Landscape Plan (2774-10-05 Rev B) has, in parallel to this planning application, been submitted to the Council within a S73 application. The S73 application is being made in order to 'amend' a number of the planning conditions on the main MGEP permission. As part of the S73 application ECO2 are seeking to implement an alternative landscaping scheme to that currently approved. The revised landscaping scheme takes into account the equipment spares building and provides alternative landscaping treatment in other areas of the site which is required due to

modified ground conditions as a result of the development which have prevented the currently approved scheme from establishing.

- 4.5.3 The revised landscaping plan / LEMP includes a series of habitats including marshy grassland, woodland, open mosaic habitat, additional pond and reptile mitigation features. These features are considered to offer local biodiversity value and, based on the known ground conditions at the site are considered to be deliverable.

5.0 PLANNING POLICY CONTEXT AND APPRAISAL

5.1 Policy Context – Overview

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of The Town and Country Planning Act 1990 require that applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.

5.1.2 The Proposed Development is located within the administrative area of Neath Port Talbot County Borough Council. In the case of the Proposed Development, the statutory development plan comprises the following documents:

- Neath Port Talbot County Borough Council Local Development Plan 2011 to 2026 (adopted January 2016); and
- Neath Port Talbot County Borough Council Local Development Plan 2011 to 2026 Policy Map.

5.1.3 The Council have embarked on a review of the adopted Local Plan. The Draft Review Report was subject to a 6 week consultation period from the 3rd February to the 16th of March 2020. The Draft Review report did not propose any modifications to the policies considered most relevant to the determination of this application.

5.1.4 In addition to the most relevant policies of the statutory development plan, the proposal has also been considered in the context of other material planning considerations.

5.1.5 The following appraisal considers the policies and guidance which are considered directly material to the determination of the proposal for which planning permission is being sought.

5.2 Statutory Development Plan - Neath Port Talbot County Borough Council Local Development Plan 2011 to 2026 (adopted January 2016)

5.2.1 The policies of the development plan considered to be most relevant to the determination of the planning application have been established following

pre-application discussion with the Council and review of the development plan. The policies identified of most relevance are as follows:

- Strategic Policy SP1 Climate Change
- Policy BE1 Design
- Policy EN8 Pollution and Land Stability
- Strategic Policy SP18 Renewable and Low Carbon Energy

5.2.2 These policies are considered below.

Strategic Policy SP1 Climate Change

5.2.3 Strategic Policy SP1 sets out the Council's overarching policy towards climate change. The causes and consequences of climate change are set out within the policy. With regard to flood risk, the policy states:-

"1. Likely increased flood risk will be taken into account and addressed by ensuring that there is greater resilience by avoiding development on land that is at risk from flooding in the first instance in accordance with the sequential approach set out in national guidance or in locations that could increase the risk of flooding elsewhere;"

5.2.4 As identified in the Flood Consequences Assessment (Appendix A), the Development Advice Map (DAM) for Wales shows areas at risk of flooding for the purposes of land-use planning. The Proposed Development would be located within Flood Zone B of the DAM. Technical guidance, TAN 15, to be used alongside the DAM, requires an assessment of flooding consequences to be provided in parts of Zone B where flooding has been identified as a material consideration to allow for localised problems. No flooding issues have been identified at the MEGP plant since it was constructed.

5.2.5 In addition, Flood Zone mapping from Natural Resources Wales (NRW) shows the Site outside of flood zones 2 and 3 which are areas at high risk of flooding. The NRW detailed flood mapping has shown:

- The Site does not lie in a high risk area of flooding from rivers or the sea;
- The Site is not shown to be in a flood warning area or flood alert area;

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- The Site is not a risk from reservoir flooding;
 - The Site is not shown to be susceptible to surface water flooding.
- 5.2.6 With regard to increasing flood risk elsewhere, the Drainage Assessment (Appendix B) proposes a SuDS solution for managing surface water runoff, which include an allowance for increased intensity rainfall events as a result of climate change.
- 5.2.7 The Proposed Development would not be located on land at risk from flooding and would not increase the risk of flooding elsewhere. The proposal is therefore considered in accordance with Strategic Policy SP1.
- 5.2.8 The development is being proposed to support the efficient operation of the MGEP which has a renewable energy generating capacity of 40MW. The development would enable any shut down periods at the plant to be minimised and help ensure that the maximum amount of renewable energy is generated from the facility. The ability to store equipment on site would also reduce the need for transportation to / from a remote storage location, reducing greenhouse gas emissions from transport.
- 5.2.9 On the basis of the above the Proposed Development is considered to help achieve Strategic Policy SP1.

Policy BE1 Design

- 5.2.10 Policy BE1 expects all development proposals to “*demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive and sustainable places*”. The policy then sets out that proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1 It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;

2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural

heritage and it takes account of the site topography and prominent skylines or ridges;

3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;

4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;

5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;

6. It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);

7. It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;

8. It uses resources, including land and energy, as efficiently as possible through: (a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area; (b) The layout and form of the development does not preclude the reasonable use of other adjacent land; (c) Developing brownfield land in preference to greenfield land where possible; (d) Minimising building exposure while maximising solar gain.

9. Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;

10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.

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- 5.2.11 Criteria 6 and 7 are not considered relevant for this proposal. The remaining criteria are considered below.
- 5.2.12 The proposed spares equipment building would be a minor small scale addition to the much larger complex of buildings associated with the MGEP. The proposed building would use materials complementary to the main MGEP and due to its modest 7m height and small footprint when compared to the rest of the MGEP development, would not influence the perceived scale or massing of the overall development. Therefore, the proposal is considered in accordance with criterion 1.
- 5.2.13 With regard to Criterion 2, it is considered that the Proposed Development respects the context of the MGEP plant as a whole by being designed to complement other buildings on the larger site. The Proposed Development is of a much smaller scale when considered against the backdrop of the MGEP plant as a whole and therefore it is considered that there will be little change with regard to the view of the plant within the local landscape. .
- 5.2.14 The proposed Landscaping Scheme provides details of proposed hard and soft landscaping considered appropriate to its surroundings, in accordance with criterion 3.
- 5.2.15 The proposal would not result in an increase in the number of workers at the Site and therefore there would not be an adverse impact on highway safety in accordance with criterion 4.
- 5.2.16 With regard to important local features listed in criterion 5, there is a Landscape of Historic Interest, Margam Mountain, approximately 380m east of the Site. It is considered, due to its location within the overall site and its relatively low ridge height the equipment storage building would not introduce any material change to the visual appearance of the overall MGEP complex from the wider landscape. Criterion 5 also references retaining and enhancing important biodiversity and ecological connectivity as far as possible. The Proposed Development would not constrain biodiversity and ecological connectivity, in particular it would not affect the locally important wet woodland habitat located to the south and west of the MGEP.

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- 5.2.17 It is considered that the Proposed Development is in accordance with criterion 8 by using an existing site to make the most efficient use of land. If the proposed building was located on another site, inefficiencies would occur from the additional time required to access spare parts and equipment causing unnecessary delays and longer shutdown periods.
- 5.2.18 Part b of criterion 8 refers to the Proposed Development not precluding the reasonable use of other adjacent land. The Proposed Development is located within the existing fence line of the MGEP and would not preclude development proceeding on any of the land allocated for development within the Local Development Plan.
- 5.2.19 With regard to drainage systems referenced in criterion 9, as set out under Strategic Policy SP 1 and in Section 4.0 of this report, a SuDS solution has been proposed as part of the development.
- 5.2.20 In accordance with criterion 10 the proposed building has been designed with hand railed ramp access into the building, along with a dropped kerb, thus facilitating use of the building to mobility impaired users.
- 5.2.21 Therefore, in light of the foregoing, the Proposed Development is considered to be consistent with the aims of Policy BE1 of the adopted LDP.

Policy EN8 Pollution and Land Stability

- 5.2.22 Policy EN8 sets out the Council's policy with regard to Pollution and Land Stability. Policy EN8 states that proposals which will have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to, in particular, matters of air pollution, light pollution and water pollution will not be permitted.
- 5.2.23 The nature of the Proposed Development is such that there would be no change in respect of air quality, contamination, water & ground water quality or effects on human health.
- 5.2.24 With regard to any possible noise pollution, the proposed operations to be carried out within the building would not create a significant noise impact. Furthermore, Condition 19 of the operative planning permission (P2016/0949) sets limits for operational noise for the plant as a whole.

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- 5.2.25 With regard to land instability, a Coal Mining Risk Assessment (Appendix C) accompanies this application which concludes that the risk to the Site from abandoned shallow mine workings is negligible.
- 5.2.26 No external lighting is proposed on the building and therefore there will not be any light pollution from the Proposed Development.
- 5.2.27 Consequently, it is considered that there would be no conflict with policy EN8 of the adopted LDP.

Strategic Policy SP18 Renewable and Low Carbon Energy

- 5.2.28 Strategic Policy SP18 sets out the Council's policy for renewable and low carbon energy. Included within the policy is encouragement, where appropriate, of all forms of renewable energy and low carbon technology. The principle of this renewable energy plant has been established. The Proposed Development will contribute to making the MGEP an efficient and reliable plant by providing spare equipment on-site, enabling the facility to keep working. The Proposed Development would therefore support the wider renewable energy and waste management functions of the MGEP.

5.3 Material Considerations

Planning Policy Wales (PPW) Edition 10 (December 2018)

- 5.3.1 The PPW sets out the land use planning policies of the Welsh Government. National Planning policy comprises, the PPW which is supported by Technical Advice Notes (TANs), Minerals Technical Advice Notes (MTANs) and policy clarification letters.
- 5.3.2 The PPW sets out that its primary objective is "*to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, and environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act and other key legislation.*"(paragraph 12).
- 5.3.3 With regard to energy, paragraph 5.7.1 acknowledges that the planning system plays a key role in delivering clean growth and the decarbonisation of energy, in addition to building resilience to the impacts of climate change.

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- 5.3.4 The PPW sets out that the Welsh Government is committed to delivering the outcomes as set out in *Energy Wales: A Low Carbon Transition* which includes the priority of reducing reliance on energy generated from fossil fuels (paragraph 5.7.4).
- 5.3.5 The Proposed Development would help support the operation of the MGEP which utilises waste wood for the production of renewable energy. As such it helps to achieve one of the key principles set out in PPW 'Productive and Enterprising Places' through the development of economic infrastructure, which helps generate energy in a sustainable manner and helps to promote the circular economy.
- 5.3.6 Accordingly, the development is considered to contribute towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015

Renewable and Low Carbon Planning Policy and Legislation

- 5.3.7 There are a plethora of national policies and legislative documents supporting the development of renewable and low carbon energy generation projects. Neath Port Talbot has itself recently published a consultation draft of 'Decarbonisation and Renewable Energy Strategy'.
- 5.3.8 This Strategy/Action Plan outlines the Council's overarching vision and objectives, sets out what the Council has already achieved and identifies the potential future opportunities that exist in relation to renewable and low carbon developments.
- 5.3.9 Section 2 provides a review of the relevant UK and national policy documents which identify the importance of supporting renewable energy development. It is clear that there is significant support for developments which help achieve the urgent need for increased renewable energy.
- 5.3.10 As set out above this development would help ensure that the MGEP operates in an efficient and reliable manner, maximising the amount of renewable energy which can be generated by the plant. In this regard the development gains support from the policies which relate to encouraging renewable energy generation.

6.0 CONCLUSION

- 6.1.1 The Proposed Development has been designed to complement the main MGEP in terms of function and form. Building materials would match the main plant and the equipment storage building would not alter the overall scale and massing of the MGEP complex.
- 6.1.2 The proposed equipment storage building is required to enable the efficient and reliable operation of the MGEP plant. The longer the MGEP can operate without interruption, the more energy can be produced from a renewable resource, reducing the reliance on fossil fuels in accordance with local and national policy.
- 6.1.3 The potential environmental effects of the Proposed Development have been considered and no unacceptable adverse environmental effects have been identified.
- 6.1.4 The Proposed Development has been appraised in the context of the Statutory Development Plan and relevant material policy considerations. This process has demonstrated that the Proposed Development is either in conformity with, or supported by, all facets of the identified relevant planning policy context when considered individually and as a whole.
- 6.1.5 Accordingly, we would kindly request that planning permission for the proposed equipment spares building is granted without delay.