



PLANNING STATEMENT

PROPOSED STORAGE BUILDING AT LAND SOUTH OF NEATH ROAD, ABERGARWED

on behalf of
Mr C Hendy of ASW Scaffolding

Our Ref: 1083.a
Date: January 2021
Prepared by: JDE

1.0	INTRODUCTION	3
2.0	SITE DESCRIPTION	4
2.1	THE SITE	4
2.2	THE SURROUNDING AREA	5
2.3	PROJECT DESIGN PARAMETERS AND PRINCIPLES	6
3.0	THE PROPOSED DEVELOPMENT.....	7
4.0	LOCAL PLANNING POLICY	10
5.0	CONCLUSION.....	13

1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Mr C Hendy to prepare a full planning application for a storage building for use by his scaffolding company at land south of Neath Road, Abergarwed. The application has been prepared following the receipt of a response from the local planning authority (LPA) to a pre-application enquiry and subsequent discussions for a larger form of development relating to multiple industrial units. Taking on board the comments of the Authority and the specific needs of the Applicant, the scheme now relates to a single building at a location within the wider site considered previously to be acceptable for such a scale of development by the Authority.
- 1.2 This Planning Statement therefore forms part of the submissions of the application to be considered by the Authority, and provides information on the following points:
- A brief description of the site and surrounding area
 - A description of the proposed development
 - Consideration of relevant planning policy
- 1.3 Following further discussions with the LPA, this current application is also now accompanied by a Transport Statement, Ecological Appraisal Report, Coal Mining Risk Assessment and a Flood Consequence Assessment, all of which should be read in conjunction with this Statement.

2.0 SITE DESCRIPTION

2.1 THE SITE

- 2.1.1 The application site (pictured below) relates to an area of land forming part of a much larger parcel of brownfield land consisting of a range of hardstanding and surfaced areas.



Photograph 1



Photograph 2

- 2.1.2 The northern element of the application site is largely undefined, with only its western edge defined by a mix of boundary treatments. The southern element of the core of the site is then similarly open (illustrated in Photograph 2), providing the means of access to the northern element from the shared access road, which then runs on to Neath Road.
- 2.1.3 As can be seen from Photograph 1, the land has previously housed buildings used for commercial purposes, with the last active use we understand being that of a vehicle repair garage. Part of the application site however recently benefitted from planning permission (LPA Ref. No. P2014/1193) for a building for use for storage purposes (potatoes), but this has not been constructed. Notwithstanding this, it is the form, scale and footprint of this previously approved building that has been replicated by this current planning application.

2.2 THE SURROUNDING AREA

- 2.2.1 As illustrated by the photograph below, the application site lies at the north eastern edge of the settlement of Abergarwed.



Photograph 3

- 2.2.2 Directly to the application site's south then lies an existing highway maintenance yard and storage depot, which then also uses the same access road as the application site. The core of the settlement of Abergarwed is then located to the west of the application site, largely based along Neath Road. A number of well served bus stops are also present within the settlement.
- 2.2.3 In the wider sense, Abergarwed is located just off the A465, which provides it with good access to the nearby larger settlements of Neath and Resolven. In terms of the latter, the settlement contains a wide range of community facilities and local services. Notwithstanding this, it should be noted that the area is currently designated as an Objective 1 Area with regards to its economic status and so regeneration projects represent a vital and key tool in addressing this current position.

2.3 PROJECT DESIGN PARAMETERS AND PRINCIPLES

2.3.1 As a result of the local context and the requirements of the Applicant's business, the following design principles and parameters have influenced the design of the proposal subject of this planning application:-

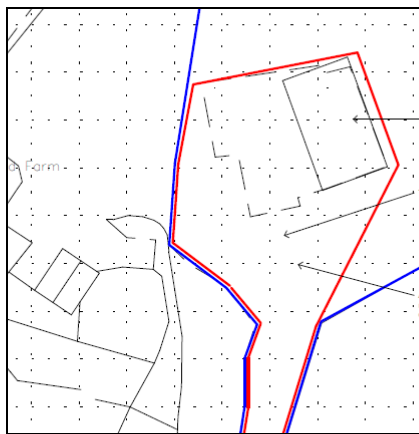
- **Scale** – To replicate the general form of that of the previously approved building, whilst also being fit for purpose for the Applicant's business needs.
- **Design** – To utilise finishes that are reflective of those previously approved, but also those of other commercial buildings found in the area.
- **Access** – To utilise the existing means of access serving the site.

3.0 THE PROPOSED DEVELOPMENT

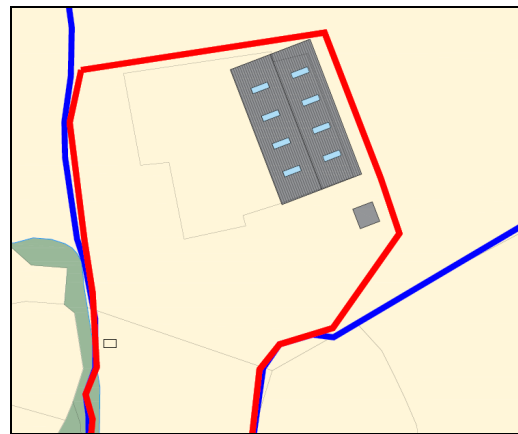
- 3.1 The proposal is for full planning permission for a new commercial storage building for use by the Applicant's business. The following information should be read in conjunction with the accompanying plans, drawings and associated supporting information.

Project Overview

- 3.2 As detailed previously, the proposal subject of this current application has drawn heavily on the previously approved storage (potatoes) building. As a result, the general scale and form of the proposed building reflects that of the approved scheme, as illustrated by the two site layout plans below:



Plan A
(Approved Layout)



Plan B
(Proposed Layout)

- 3.3 In addition to the above then ensuring that the proposal will have a comparable if not identical visual contribution to the wider setting as to that of the previously approved scheme, the siting of the proposed building subject of this application also then protects heritage assets (filled in canal) that were highlighted by the Authority during the pre-application enquiry process for the larger scheme.

- 3.4 Similarly to the form and scale of the proposal, the level and form of traffic to be generated by the proposed use is reflective of that previously approved for the site. This is fully explored and set out in the accompanying Transport Statement, clearly indicating that the proposal will not result in any differing impact on existing users of the local highway network as to that of the previously approved scheme.

Operational Activities

- 3.5 The proposed building will act as the principle depot for the Applicant's scaffolding provision business. The building will therefore house equipment, some vehicles when not in use and an office area from which to coordinate and undertake the business' paperwork requirements. Welfare facilities will also be provided for staff when present on site.
- 3.6 We understand from the Applicant that the general depot related activities of their business relates to general loading and unloading of vehicles with the required equipment for the different forms of project the business works on. This invariably requires therefore for staff to be on-site at the start of the working day and then at the end of the working day, with for the vast majority of time no staff being present on site during the day. As a result of this working pattern, the following periods of operation are proposed, but it should be again noted that there will be little or no activity on the site during the day:

Mon-Fri	0730hrs to 1630hrs
Saturday	0800hrs to 1400hrs

- 3.7 We understand that the Applicant's business has between 8-15 employees at any one time, but not all will visit the site at the same time, often being picked up on route to a project site or being met there. As a result, there are no more than 2 at the application site outside normal loading and unloading hours.

External Finishes

- 3.8 The proposed building will be based on a steel portal framework, with the roof and walls then clad in steel profile sheeting. The means of entry will be in the form of a pedestrian door at the rear of the elevation, with a pedestrian door and roller shutter vehicle door present in the front elevation.

Landscaping and Boundary Treatments

- 3.9 Aside from that occupied by the proposed building, all external areas will remain as existing (including ground levels), as will any existing boundary treatments.

Access and Parking Arrangements

- 3.10 Although not formally marked on the ground, as indicated in the accompanying Transport Statement, the application site has sufficient space to accommodate both staff and commercial vehicle parking. Likewise, the site is also able to provide sufficient space to accommodate turning provision for both commercial and staff vehicles, without conflict.

Drainage

- 3.11 The proposal will be served by a surface water drainage system compliant with current regulations. All foul water will be disposed of via a new septic tank.

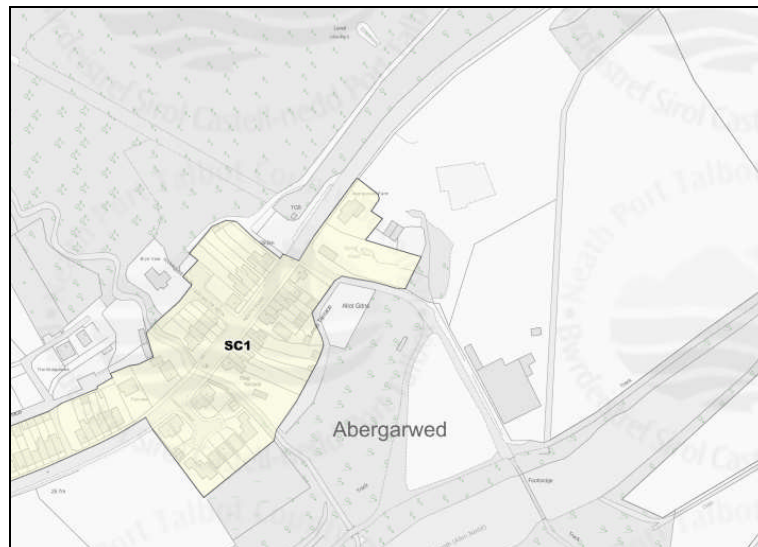
4.0 LOCAL PLANNING POLICY

4.1 In terms of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the adopted development plan for the area within which the application site is positioned is the *Neath Port Talbot Local Development Plan* (LDP). It is therefore the policies of this document that have been referred to in the preparation of the proposal subject of the planning application in question, including the following:-

- Policy SP1 – Climate Change
- Policy SP6 – Development in the Valleys Strategy Area
- Policy SP16 – Environmental Protection
- Policy SP20 – Transport Network
- Policy SC1 – Settlement Limits
- Policy EC5 – Employment Uses in the Valleys
- Policy EN7 – Important Natural Features
- Policy TR2 – Design and Access of New Development
- Policy BE1 – Design
- Policy BE3 – The Canal Network

4.2 Notwithstanding the above, any consideration of the application proposal must be made against the context of the previously granted planning permission for an almost identical building on the site. On the basis that the form, scale and design of the two buildings are comparable, it is considered that the relevant aspects of Policy BE1 are adhered to. In addition, due to the siting of the building, any heritage interest in the site in relation to the former canal, would then be protected, ensuring the proposal also then adheres to Policy BE3.

4.3 Policy SC1 then deals with the matter of defined Settlement Limits around settlements within the County Borough. Abergarwed does indeed have such limits (extract of Proposals Map shown in Plan C), with the application site then adjoining these.



Plan C

- 4.4 Under the provisions of Policy SC1 (which deals with Settlement Limits) it sets out a series of forms of development that would be deemed acceptable at locations that whilst lying outside of the defined Settlement Limits, they nevertheless adjoin them or are well related to them. Such uses include “... *small scale employment* ...” uses (Criterion 1), which the application proposal represents an example of.
- 4.5 The supporting text of Policy SC1 then goes on to advise that in dealing with specific forms of business, the relevant topic based policies should then be referred to. In the case of the application proposal, the most relevant policy is Policy EC5 (*Employment Uses in the Valleys*). The Policy makes specific provision for employment uses outside of defined Settlement Limits, providing the following criteria are met:
1. The site directly adjoins the settlement limit; and
 2. The site is in a sustainable location and is accessible by sustainable modes of transport; and
 3. The site is serviced or can be readily serviced; and

4. Development would have no detrimental impact on the amenities of neighbouring commercial or residential properties, the environment, landscape or highway safety; and
 5. The development would be proportionate in scale and form to the role and function of the settlement or area.
- 4.6 The application proposal relates to a site that adjoins the settlement of Abergarwed and its associated limits. Abergarwed is a settlement served by a number of bus stops, as well as being located a short distance from one of the County Borough's main transport arteries. We understand that the relevant services are present on site and that taking into consideration the nature of the proposed use, its hours of activity and the recent planning history of the site, the proposal will therefore have no detrimental impact on neighbouring uses, the environment, the surrounding landscape or highway safety. Combined therefore with the proposal representing a modest commercial scheme to serve a local business and secure local employment – all in an Objective 1 Area - the application proposal therefore fully adheres to the requirements of Policy EC5 and in turn those of Policy SP20 and Policy TR2.
- 4.7 In addition to the above consideration and following previous discussions with the LPA with regards to the proposal, further investigatory works and assessments have been undertaken with regards to possible biodiversity interests on the site and possible levels of flood risk.
- 4.8 With regards to the former, this application submission is accompanied by an Ecological Appraisal Report, which subject to a small number of recommendations being adhered to (which the Applicant is committed to), concludes that the application proposal will have no detrimental impact on any biodiversity interests. As a result, the application proposal adheres to the relevant requirements and objectives of Policy SP16, Policy EN7 and Policy BE1.
- 4.9 Turning then to the matter of flooding, it is recognised that an element of the application site lies within a C2 Flood Risk Zone as defined by the Development

Advice Maps, forming part of *Technical Advice Note 15: Development and Flood Risk* (TAN15). As a result and in accordance with the requirements and guidelines of TAN15, the application submissions are accompanied by a Flood Consequence Assessment (FCA).

- 4.10 The FCA considers the flood risk levels of all elements of the application site. It highlights however, that the area at least risk is that to be occupied by the proposed new building, with in fact, a large portion of it being positioned outside the defined C2 Zone. The FCA rightly goes on to set out that TAN15 highlights that there are circumstances when the siting of new development within C2 Zones can be considered to be acceptable.
- 4.11 In considering the guidance of TAN15, the nature of the application proposal and indeed the nature of the application site itself must therefore be taken into consideration. The proposal is a form of 'less vulnerable' development as defined by TAN15 and represents a proposal that will help regenerate a longstanding brownfield site in an Objective 1 Area. With this in mind, together the low level of risk the application building would be subject to, the application proposal therefore clearly represents a form of development and regeneration project supported by TAN 15 and so in turn also adheres to the requirements of Policy SP1.
- 4.12 In summary therefore, the application proposal adheres to the detailed aspects of local and national planning policy, as well as assisting with meeting the strategic objectives of Policy SP6.

5.0 CONCLUSION

- 5.1 The proposal is for a storage building for use by his scaffolding company at land south of Neath Road, Abergarwed
- 5.2 The proposal has come about as a result of a direct demand required by the Applicant's scaffolding provision business for a storage facility that is currently not met by the existing supply of land and premises in the area. Recognising its long standing commercial and industrial history, as well as its key location from a transport perspective, the Applicant has therefore acquired the site with a mind to then meet the needs of his own business. However, whilst the importance of meeting their commercial needs to continue to secure local employment opportunities is significant, the Applicant also recognises this must be balanced against other wider interests, and so all environmental matters have been given full consideration in the preparation of this application.
- 5.3 As a result of the above, the application proposal represents a modest development that draws on the previous consent on the site, both in terms of physical form and operational scale. The proposal therefore relates to a modest commercial development, at a sustainable location that will not result in any detrimental impact to any known current or historical interest. The application proposal therefore represents a valuable opportunity to help regenerate a brownfield site and secure a local employment opportunity, all in full adherence to the requirements of both local and national planning policy.
- 5.4 We therefore respectfully request that planning permission be granted for the scheme put forward by this application.