

APPLICATION FOR A LAWFUL DEVELOPMENT CERTIFICATE FOR THE INSTALLATION OF ROOF MOUNTED SOLAR PV ON A NON-DOMESTIC BUILDING

SUPPORTING STATEMENT

AMAZON UK SERVICES LTD
CWL1, CRYMLYN
BURROWS, SWANSEA,
SA1 8QX

APPLICATION FOR A LAWFUL DEVELOPMENT CERTIFICATE FOR THE INSTALLATION OF ROOF MOUNTED SOLAR PV ON A NON-DOMESTIC BUILDING

SUPPORTING STATEMENT

**AMAZON UK SERVICES LTD CWL1, CRYMLYN
BURROWS, SWANSEA, SA1 8QX**

ON BEHALF OF SONNE SOLAR LIMITED

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)
(WALES) ORDER 1995 (GPDO) (AS AMENDED)**

Pegasus Group

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL
T 01454 625945 | **F** 01454 618074 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	SITE DESCRIPTION & THE WIDER AREA	2
3.	PROPOSED DEVELOPMENT	4
4.	PERMITTED DEVELOPMENT REGULATIONS ASSESSMENT	5
5.	CONCLUSION	10

1. INTRODUCTION

- 1.1 This Supporting Statement has been prepared by Pegasus Group on behalf of Sonne Solar Limited for an application for a Lawful Development Certificate for the proposed installation of roof mounted solar photovoltaic panels with an output of approximately 3.3 MW on the roof of Amazon UK Services Ltd, CWL1, Crymlyn Burrows, Swansea SA1 8QX.
- 1.2 This Statement describes the project and demonstrates that this proposed development constitutes Permitted Development under Class A of Part 43 of the Town and Country Planning (General Permitted Development) (Wales) Order 1995 (GPDO) (As Amended).
- 1.3 A Lawful Development Certificate is sought from Neath Port Talbot County Borough Council to confirm that development constitutes permitted development, for which planning permission is not required.

2. SITE DESCRIPTION & THE WIDER AREA

- 2.1 The Amazon Fulfilment centre at CWL1, Crymlyn Burrows, Swansea SA1 8QX is situated within the South Western extent of the North Port Talbot Planning jurisdiction, on the outskirts of Swansea.
- 2.2 Planning consent was given for the building in 2007 under application reference P2007/0236. The development proposal was described as follows: "Erection of a distribution warehouse (Class B8) with associated car parking, external works and landscaping; construction of access roads including main access roundabout; construction and closing up of a temporary access road for construction traffic".
- 2.3 Geographically the site is located approximately 0.6 km North of the coastline of Swansea Bay and located 5.4 km due East of the centre of Swansea. Port Talbot is located due South East of the site approximately 6.2 km to it's centre and the immediate site surroundings comprise of a mix of coastal terrain directly South and commercial and industrial buildings to the West. The coastal area adjacent to the South named 'Crymlyn Burrows' is a designated Site of Special Scientific Interest (SSSI).
- 2.4 Other notable land uses in the area include the Towers Hotel and Spa to the North East of the site, the Swansea Bay Golf Club to the East and the Swansea University Bay Campus area to the South West. The nearest residential area in relation to the site is the Ocean View residential development which is approximately 0.5km North East.
- 2.5 The site is not located within a Conservation Area or a World Heritage Site and the site does not comprise of an Ancient Monument. There are two listed buildings located North East of the site that are contained within the wider site of the Towers Hotel and Spa complex. These are the grade II listed Jersey Marine Tower and the Grade II Listed Handball Court.
- 2.6 There are no aerodromes in close proximity to the site area, the nearest one is Swansea Airport which is situated over 14 km away to the West.
- 2.7 The site does not lie within a defined flood risk area in terms of flood risk from the sea or from rivers.
- 2.8 In terms of access and road infrastructure the building is sited adjacent (North) to the A483 which is a key dual carriageway linking Swansea to the M4 motorway,

meeting at junction 42 and the interchange with the A48 which serves as the main access route into Port Talbot which. Therefore, the site is readily accessible for Heavy Goods Vehicles and the building is served by its own access road 'Ffordd Amazon' which begins at the interchange with the A483 roundabout sited due East of the building and leads round to the North of the building and beyond to the other industrial areas located to the West.

- 2.9 The site specifically lies within a designated employment zone in planning policy terms under EC2/1 (Fabian Way). In the employment designation areas uses are generally for B1, B2, B8 and complimentary employment use.
- 2.10 The main Amazon building itself lies on a flat land area which is screened to the South from the existing planting and vegetation and to the North of the inner 'Ffordd Amazon' access road there are landscaping bunds and further screening. There is further screening to the West between the industrial buildings and to the East the A483 is heavily tree lined and planted and views towards the main building are only achievable once in close proximity.
- 2.11 CWL1 is directly accessed via the 'Ffordd Amazon' access road which links to an inner access road for vehicular access to the parking areas and lorry entrance and exit points. Immediately North of the warehouse is a large parking area to accommodate staff parking and visitors, there is an additional overflow car parking area sited to the West of the building. To the sides of the existing warehouse are service yard and HGV loading bay areas that back up to the edges of the warehouse. Further overflow HGV and trailer parking is provided within the service yard areas.
- 2.12 The existing Amazon building CWL1 is comprised a large storage and distribution warehouse/fulfilment centre (Use Class B8).
- 2.13 Whilst the warehouse is predominately rectangular in shape, there are projecting elements of the building, consisting of ancillary offices/welfare facilities and HGV loading bays.

3. PROPOSED DEVELOPMENT

- 3.1 The development proposal relates to the installation of solar photovoltaic (PV) panels with an output of approximately 3.3 MW on the roof of the existing Amazon UK Services building at CWL1, Crymlyn Burrows, Swansea SA1 8QX.
- 3.2 The proposed development will comprise the installation of the following components:
- Approx. 7020 x 460W PV modules mounted on multiple roof areas as indicated on the submitted application drawings.
 - 26no. Inverters will be located either at roof level or will be mounted within the existing LV enclosures located on the ground floor on the south and north of the CWL1 fulfilment centre, or a mix of the two.
- 3.3 The existing Amazon UK Services building benefits from a flat roof with associated walkways, cable trays and supporting infrastructure. The proposed panels will be sympathetically positioned and distributed on both the central and western portion of the buildings roof.
- 3.4 The PV modules will be mounted to the roof on a flat roof ballast framing system and will be arranged in one almost continuous area across the central and western areas of the roof structure.
- 3.5 The proposed development will involve the installation of new galvanised cable trays that will run between the proposed PV arrays and will run from the roof to the proposed inverters that will either be at roof level or adjacent to the existing LV enclosures at ground floor level. Further cable trays will also be installed to connect the proposed inverters to the existing LV enclosures.
- 3.6 The development proposals support Amazon UK Services commitments to reducing their carbon emissions. The proposed solar panel on the roof of the Amazon UK Services building help meet this objective particularly when viewed as part of the overall sustainability of the building design and operation which incorporates measures to minimise the energy requirement of the building and maximise energy efficiency, including the existing solar array installation atop the warehouse roof.
- 3.7 The majority of the energy generated by the panels will be used by Amazon UK Services Ltd in their operations. The proposed arrays will generate electricity from

a renewable source to feed directly into the site to meet part of its electricity demand.

4. PERMITTED DEVELOPMENT REGULATIONS ASSESSMENT

- 4.1 Part 43 of Schedule 2 of the GPDO outlines what non-domestic generation can be undertaken as 'permitted development', without planning permission. Class A specifically relates to the *'installation of solar PV on a building other than dwellinghouse or a block of flats'*.
- 4.2 Part 43 *"Installation of non-domestic microgeneration"* was inserted into the GPDO by the 2012 amendment. The 2019 amendment allowed the increase of energy output permitted by removing the word *'micro'* from generation, thus since 2019 Part 43 is titled *"Installation of non-domestic generation"*.
- 4.3 The proposed development has been considered against the provisions of The Town and Country Planning (General Permitted Development) (Amendment) (Wales) (No. 2) Order 2012 as amended by The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2019.
- 4.4 The remainder of this chapter assess the proposal against each relevant criteria of Class A of Part 43. The legislation is considered

Part 43 Installation of non-Domestic Generation Equipment

Class A

Permitted Development:

A. The installation, alteration or replacement of solar PV or solar thermal equipment on a building other than a dwellinghouse or a block of flats.

Development is not permitted by Class A of Part 43 if :-

a) The solar PV or solar thermal equipment would be installed on a wall or pitched roof and would protrude more than 200mm beyond the plane of the wall or the roof slope when measured perpendicular with the external surface of the wall or roof slope;

[continued]

- 4.5 The solar PV panels would be mounted on the flat roof of the Amazon building CWL1 and as such criteria a) is not relevant. In any event, the solar PV panels would be set at minimum 2m from the building's parapet and as such it would not protrude beyond 200mm beyond the wall or roof slope when measured perpendicular with the external surface of the wall or roof slope.

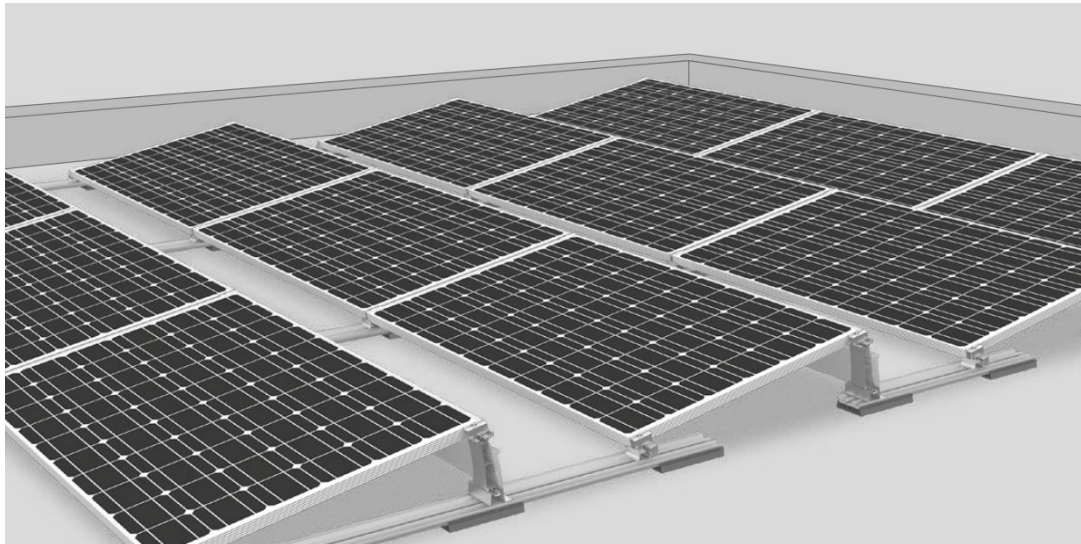
Development is not permitted by Class A of Part 43 if :-....

b) The solar PV or solar thermal equipment would be installed on a flat roof and would protrude more than 1m above the plane of the roof;

[continued]

- 4.6 The solar panels will be mounted to the roof on a flat roof ballast framing system which has a 10 degree tilt from horizon. The solar PV would not protrude more than 1m above the plane of the roof. The maximum height of the installation would be 0.8m above the plane of the roof. The proposal therefore satisfies this criterion.

- 4.7 *Illustration of the mounting system is set out below: -*



Development is not permitted by Class A of Part 43 if :-....

c) The solar PV or solar thermal equipment would be installed on a roof and within 1 metre of the external edge of the roof;

[continued]

- 4.8 As depicted on the Roof Layout Plan the solar panels will be located at a distance of greater than 2 metres from the edge of the building. The proposal therefore is compliant with criterion c).

Development is not permitted by Class A of Part 43 if :-....

d) The solar PV or solar thermal equipment would be installed on a wall and within 1 metre of a junction of that wall with another wall or with the roof of the building;

[continued]

- 4.9 The solar equipment will all be roof mounted and no elements would be installed within 1 meter of a junction of that wall to another wall or with the roof of the building, the proposal therefore is compliant with criterion d).

Development is not permitted by Class A of Part 43 if :-....

e) In the case of a building on article 1(5) land or on land within a World Heritage Site, the solar PV or solar thermal equipment would be installed on a wall or roof slope which fronts a highway;

[continued]

- 4.10 The site is not contained within an area of land designated as article 1(5) land or within a World Heritage Site, the proposal therefore is compliant with criterion e).

Development is not permitted by Class A of Part 43 if :-....

f) The solar PV or solar thermal equipment would be installed on a site designated as a scheduled monument;

[continued]

- 4.11 The site is not designated as a scheduled ancient monument, the proposal therefore is compliant with criterion f).

Development is not permitted by Class A of Part 43 if :-....

g) The solar PV or solar thermal equipment would be installed on a listed building or on a building within the curtilage of a listed building; or

[continued]

- 4.12 The site is not a listed building or within the curtilage of a listed building, the proposal therefore is compliant with criterion g).

Development is not permitted by Class A of Part 43 if :-....

h) The solar PV or solar thermal equipment would be installed on a building within three kilometres of the perimeter of an airport or aerodrome.

- 4.13 The site is not located within three kilometres of the perimeter of an airport or aerodrome the proposal therefore is compliant with criterion h).
- 4.14 The development would therefore be permitted subject to the considerations of the following conditions.

Conditions:

A.2 Development is permitted by Class A subject to the following conditions –

(a)solar PV or solar thermal equipment must, so far as practicable, be sited so as to minimise its effect on the external appearance of the building;

(b)solar PV or solar thermal equipment must, so far as practicable, be sited so as to minimise its effect on the amenity of the area;

(ba) solar PV or solar thermal equipment must, so far as practicable, be sited so as to minimise any impacts from glint or glare; and

(c)solar PV or solar thermal equipment no longer needed for or capable of generation must be removed as soon as reasonably practicable.

- 4.15 Due to the low level projection from the flat roof and the siting of the panels being more than 2 metres inwards from the outer edge of the building there will be no material effect on the external appearance of the building. The proposal therefore satisfies condition a).
- 4.16 The flat roof ballast framing system has been chosen to keep the panels at a very low level atop the existing flat roof. The siting of the panels away from the roof edge would ensure that the solar PV panels would have no impact on the local highway network, furthermore it would not be readily visible to occupiers of neighbouring buildings in the vicinity of CWL1. The immediate area is industrial and commercial with the Amazon site CWL1 being an existing dominant warehouse structure in the area, the installation of the solar panel and equipment will not change this relationship with the surrounding amenity of the area. The proposal therefore satisfies condition b). Furthermore, being roof mounted on a large building which is taller than the surrounding/adjacent buildings, the solar panels will not cause significant glint or glare to ground based receptors including the local highway. . The proposal therefore satisfies condition b.a).
- 4.17 The building is in commercial use by Amazon Services Ltd who are committed to reducing their carbon emissions; the solar equipment is intended to remain in place for the duration of Amazons occupation of the site to be energy efficient. The proposal therefore satisfies with condition c).

5. CONCLUSION

- 5.1 For the reasons set out in this supporting statement, the development proposal is considered to meet the criteria and conditions of Schedule 2, Part 43, Class A of the of the Town and Country Planning (General Permitted Development) (Wales) Order 1995 (GPD0) (As amended). Accordingly, the proposal constitutes permitted development and planning permission is not required.
- 5.2 On behalf of Sonne Sonar Ltd we therefore request that a ***Lawful Development Certificate is issued*** for the proposed development.

pegasusgroup.co.uk

First Floor, South Wing,
Equinox North, Great Park Road,
Almondsbury, Bristol, BS32 4QL

E Bristol@pegasusgroup.co.uk

T 01454 625 945