

Date: 13th August 2021

Our Ref: 21.251

Neath Port Talbot County Borough Council
Development Control Section
The Quays, Brunel Way
Neath
SA11 2HZ

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

Tel: 02920 732 652
www.asbriplanning.co.uk

Dear Sir or Madam,

Town and County Planning Act 1990 (As Amended)
Proposed installation of Air Source Heat Pump
Land adjacent to Swn yr Afon, Brynteg, Seven Sisters, Neath, SA10 9ET
Planning Portal Reference: PP-10125138

Asbri Planning is appointed as planning agent to Swansea Bay University Health Board in respect of the above planning application for the proposed installation of an air source heat pump at land immediately adjacent to Swn yr Afon, Brynteg, Seven Sisters, Neath, SA10 9ET.

The certificate has been submitted via Planning Portal and the submission documents are listed below.

Document name (reference where appropriate)	Prepared by/Reference
Planning application forms (1APP)	Asbri Planning
Cover Letter	Asbri Planning
Site Location Plan	18565-VE-SW-XX-SI-M-XX03
Existing Site Layout Plan	18565-VE-SA-00-DR-M-5601 P2
Proposed Site Layout Plan	50639-VE-SA-00-DR-M-5602 P2
Existing Elevation	18565-VE-SA-00-DR-M-5603 P2
Proposed Elevation	50639-VE-SA-00-DR-M-5604 P2
Existing Elevation 2	50639-VE-SA-00-DR-M-5605 P1
Proposed Elevation 2	50639-VE-SA-00-DR-M-5606 P1
ASHP Technical Specifications	18565-VE-SA-XX-RP-M-5601
Databook	CAHV-P500YA-HPB
Plant Noise Assessment	RBA Acoustics

Background

Swansea Bay University Health Board has adopted a green initiative in order to limit waste and reduce carbon emissions. Accordingly, it is intended that an air source heat pump will be installed at land adjacent to Swn yr Afon, Brynteg, Seven Sisters.

Site Description

The site comprises land situated to the west of Swn yr Afon, a one storey care facility positioned along Brynteg in Seven Sisters. It measures approximately 175m².

Access to Swn yr Afon is achieved via Brynteg to the north.

The site's surroundings comprise residential dwellings to the north and west whilst a woodblock occupies the land to the east and south.

A review of Historic Wales's online register reveals that there are no listed buildings or scheduled ancient monuments within close proximity of the site. The historic environment will therefore not present a constraint to the proposed development.

The Proposed Scheme

The development relates to the installation of an air source heat pump at land adjacent to Swn yr Afon. The new ASHP will be installed within the existing fenced area, adjacent to the existing boiler room within the Care Home.

The proposed plans illustrate that 2 no. insulated pipes will extend from the air source heat pump to the boiler room. The pipework will run at a high level below the roof eaves, directly entering into the boiler room. The ASHPs will be mounted on a base with drainage to remove condensate.

Access and Movement

Due to the nature of the air source heat pump, once installed, there will be minimal on-site activity limited to standard maintenance procedures. As such, it is considered that the proposed development will have a negligible impact on the surrounding highway network.

Planning Policy Framework

Legislation

In respect of national legislation, The Climate Change Act became law on 26th of November 2008. One of the key provisions of the Act is the introduction of legally binding targets on greenhouse gas emissions comprising reductions through action in the UK and abroad of at least 80% by 2050. Targets also include reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline. The generation of electricity by renewable means, such as solar energy can be a key contributor towards meeting these targets.

The Energy Act was made law in December 2013 and includes provision on decarbonisation and electricity market reform which comprises replacing current generation capacity and upgrading the grid to deal with rising demand.

Future Wales: The National Plan 2040

Future Wales: The National Plan 2040 adopted in February 2021 establishes a national framework setting the direction for development in Wales to 2040. It forms a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

In respect of climate change, the Plan confirms that:

"It is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised

and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use and how we live and travel."

Concerning renewable energy it states:

"Wales can become a world leader in renewable energy technologies. Our wind and tidal resources, our potential for solar generation, our support for both large and community scaled projects and our commitment to ensuring the planning system provides a strong lead for renewable energy development, mean we are well placed to support the renewable sector, attract new investment and reduce carbon emissions."

Policy 17 of the Plan relates to Renewable and Low Carbon Energy and Associated Infrastructure and stipulates:

"The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs."

In determining planning applications for renewable and low carbon energy development, decision-makers must give significant weight to the need to meet Wales's international commitments and our target to generate 70% of consumed electricity by renewable means by 2030 in order to combat the climate emergency."

In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas, subject to the criteria in policy 18."

Applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty and all proposals should demonstrate that they will not have an unacceptable adverse impact on the environment."

Proposals should describe the net benefits the scheme will bring in terms of social, economic, environmental and cultural improvements to local communities. New strategic grid infrastructure for the transmission and distribution of energy should be designed to minimise visual impact on nearby communities. The Welsh Government will work with stakeholders, including National Grid and Distribution Network Operators, to transition to a multi-vector grid network and reduce the barriers to the implementation of new grid infrastructure."

Future Wales separates the country into four regions. The site lies within the South West Wales region, Policy 28 of the plan is therefore applicable and states:

Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The Welsh Government will work with regional bodies and local authorities to promote and enhance Swansea Bay and Llanelli's strategic role and ensure key investment decisions support places in the National Growth Area and the wider region."

Planning Policy Wales

National planning policy is contained within the 11th edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2021. It constitutes guidance for Local Planning Authorities (LPAs) and decision-makers and sets out the Government's planning policies for Wales and how these are expected to be applied.

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

Sustainable development is defined as:

"Sustainable Development" means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs"

Section 3 – Strategic and Spatial Choices, states that effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. The policy issues should not be considered in isolation from one another.

Section 5 – Productive and Enterprising Places covers the economic components of placemaking which promote the economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle climate change.

Paragraph 5.7.1 emphasises that low carbon electricity must become the main source of energy in Wales. Renewable electricity will be used to provide both heating and transport in addition to power. The future energy supply mix will depend on a range of established and emerging low carbon technologies, including biomethane and green hydrogen.

Paragraph 5.7.14 establishes Welsh Government's targets for the generation of renewable energy which are as follows:

- *for Wales to generate 70% of its electricity consumption from renewable energy by 2030;*
- *for one Gigawatt of renewable energy capacity in Wales to be locally owned by 2030; and*
- *for new energy projects to have at least an element of local ownership.*

Paragraph 5.7.15 goes onto state:

"The planning system has an active role to help ensure the delivery of these targets, in terms of new renewable energy generating capacity and the promotion of energy efficiency measures in buildings."

Neath Port Talbot Decarbonisation and Renewable Energy Strategy

In 2019, councillors endorsed a Decarbonisation and Renewable Energy Strategy which sets out how the Council will lead by example and do its fair share to reduce the carbon footprint of its own operations.

Neath Port Talbot Local Development Plan

The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises the Neath Port Talbot CBC Local Development Plan adopted by the Council in January 2016. A review of the LDP Proposals Map reveals that the site is situated within the settlement boundary of Seven Sisters. As such, is in an area where development is normally permitted. As illustrated on the proposals map below:

Figure 1: LDP Proposals Map Extract



The following policies are therefore considered to be relevant to the proposed development:

Policy Ref	In relation to
<i>Overarching Policies</i>	
SP1	Climate Change
Policy SC1	Settlement Limits
<i>Environment and Resources</i>	
SP18	Renewable and Low Carbon Energy
RE1	Criteria for the Assessment of Renewable and Low Carbon Energy Development

Policy SP18 relates to Renewable and Low Carbon Energy and states:

A proportionate contribution to meeting national renewable energy targets and energy efficiency targets will be made while balancing the impact of development on the environment and communities. This will be achieved by:

- 1. Encouraging where appropriate, all forms of renewable energy and low carbon technology development;*
- 2. Encouraging energy conservation and efficiency measures in all new major development proposals;*
- 3. Ensuring that development will not have an unacceptable impact on the environment and amenity of local residents.*

Policy RE1 sets out the criteria against which proposals for renewable and low carbon energy developments will be assessed and states:

Proposals for renewable and low carbon energy development will only be permitted subject to the following criteria:

- 1. Large scale wind farm developments (>25MW) will be expected to be located within the boundaries of the refined Strategic Search Areas.*

2. *Proposals for wind farms of any size outside the SSAs will only be permitted where it is demonstrated that there will be no unacceptable impact on visual amenity or landscape character through the number, scale, size, design and siting of turbines and associated infrastructure.*
3. *Small scale wind farm developments (<5MW) will be required to demonstrate that the impacts are confined to the local scale.*
4. *All renewable energy or low carbon energy development proposals will be required to demonstrate that:*
 - a) *Measures have been taken to minimise impacts on visual amenity and the natural environment;*
 - b) *There will be no unacceptable impacts on residential amenity;*
 - c) *The development will not compromise highway safety;*
 - d) *The development would not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services communications; and*
 - e) *There are satisfactory proposals in place for site restoration as appropriate.*

Planning Considerations

This section aims to identify the main issues relevant to the consideration of the certificate and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- The **principle of development** in terms of land use planning policy and sustainable development;
- The impact of the development on the **character and appearance of the surrounding area**; and
- The impact of the development in terms of **access and traffic generation**.

The following observations set the context of the appraisal:

- The proposal relates to the development of a renewable energy infrastructure scheme which will contribute to the reduction of CO2 emissions.
- The project is being progressed by Swansea Bay University Health Board therefore, it represents a public sector enterprise.
- Neath Port Talbot Council have endorsed a Decarbonisation and Renewable Energy Strategy. Therefore, the proposed development will assist in achieving their ambitions.
- The site lies within the settlement boundary, as such, is located in an area where development is normally permitted.
- Due to the nature of the air source heat pump, once installed, there will be minimal on-site activity limited to standard maintenance procedures. As such, it is considered that the proposed development will have a negligible impact on the surrounding highway network.

Principle of Development

The increase in renewable energy generation is seen to be of paramount importance within the UK in order to reduce overall CO2 emissions by 100% by 2050. Projects such as the subject of this application will help assist in the mitigation of climate change through the provision of an alternative energy sources to reduce the reliance of fossil fuels.

In planning terms, policy support for renewable energy projects is contained within Future Wales and Planning Policy Wales. Of particular relevance are Policy 17 (Renewable and Low Carbon Energy and Associated Infrastructure) and paragraphs 5.7.1, 5.7.14 and 5.7.15 of PPW, which reaffirm that the overall commitment to tackle climate change and increase energy security is of paramount importance.

Similarly, at a local level the Neath Port Talbot Local Development Plan is committed to reducing carbon emissions in order to combat climate change. The proposed development will assist Swansea Bay University Health Board and Neath Port Talbot Council in reducing their carbon emissions. In doing so, the scheme will contribute to achieving goals set out in the Council's Decarbonisation and Renewable Energy Strategy. The proposed development is therefore in accordance with criterion 1. of Policy SP18 (Renewable and Low Carbon Energy) of the adopted LDP.

Policy RE 1 (Criteria for the Assessment of Renewable and Low Carbon Energy Development) at section 4 establishes a number of criteria against which proposals are assessed and will be discussed in turn below:

Criterion (a) Measures have been taken to minimise impacts on visual amenity and the natural environment

The location of the air source heat pump has been chosen to limit the potential visual impact by being sited adjacent to Swn yr Afon and is therefore screened from surrounding uses. Given the scale of the proposal, it will not result in an adverse impact on the natural environment.

Criterion (b) There will be no unacceptable impacts on residential amenity

The application is accompanied by a Plant Noise Assessment prepared by RDA Acoustics which identifies that the noise from the proposed plant installations is within the assumed Local Authority criterion. Notwithstanding, it is recommended that the ASHPs are fitted with attenuator kits capable of achieving insertion loss. The proposed plant installation are therefore considered to be acceptable in terms of noise and will not result in an unacceptable impact on residential amenity in accordance with criterion b.

Criterion (c) The development will not compromise highway safety;

Given the site's location adjacent to Swn yr Afon, it will in no way compromise highway safety.

Criterion (d) The development would not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services communications;

Due to the nature and scale of the proposal it will not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services communications.

Criterion (e) There are satisfactory proposals in place for site restoration as appropriate.

It is anticipated that the site can be restored to its original state if required.

The proposed development is therefore compliant with relevant criteria contained within Policy RE 1 (Criteria for the Assessment of Renewable and Low Carbon Energy Development).

In light of the above, it is considered that the principle of installing an air source heat pump at land adjacent to Swn yr Afon is firmly established.

Character and Appearance of the Surrounding Area

The air source heat pump will occupy an inconspicuous position immediately adjacent to Swn yr Afon and will not be significant in scale. The site is not within close proximity to a listed building and nor is it within a Conservation Area. The site and its surroundings are within the settlement boundary, as such, is in an area where development is normally permitted. As such, the development will not adversely impact the character or appearance of the surrounding area.

Access and Traffic Generation

It is acknowledged that in order to facilitate the construction of the development, there will be an increase in vehicular movements to the site for a short period of time. However, once established, the development will require minimal personnel on site, as such, will result in a negligible impact on the surrounding highway network.

Conclusion

This letter has been prepared on behalf of Swansea Bay University Health Board to accompany a planning application for the proposed installation of an air source heat pump at land immediately adjacent to Swn yr Afon, Brynteg, Seven Sisters.

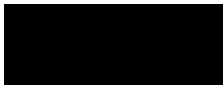
This letter demonstrates that the provision of renewable energy generating development will help contribute to climate change targets held by Swansea Bay University Health Board, Neath Port Talbot Council and Welsh Government.

The proposed development is compliant with planning policy at strategic and national levels including Policy 17 (Renewable and Low Carbon Energy and Associated Infrastructure) of Future Wales and paragraph 5.7.15 of PPW. Also, at a local level, the scheme is compliant with policies SP18 (Renewable and Low Carbon Energy) and RE 1 (Criteria for the Assessment of Renewable and Low Carbon Energy Development) of the adopted LDP.

It is therefore respectfully requested that Neath Port Talbot County Borough Council grant planning permission for the proposed installation of an air source heat pump at land adjacent to Swn yr Afon, Brynteg, Seven Sisters.

In addition, £460.00 will be paid to the Authority to cover the application fee.

Yours sincerely,



Geraint Jones

Senior Planner