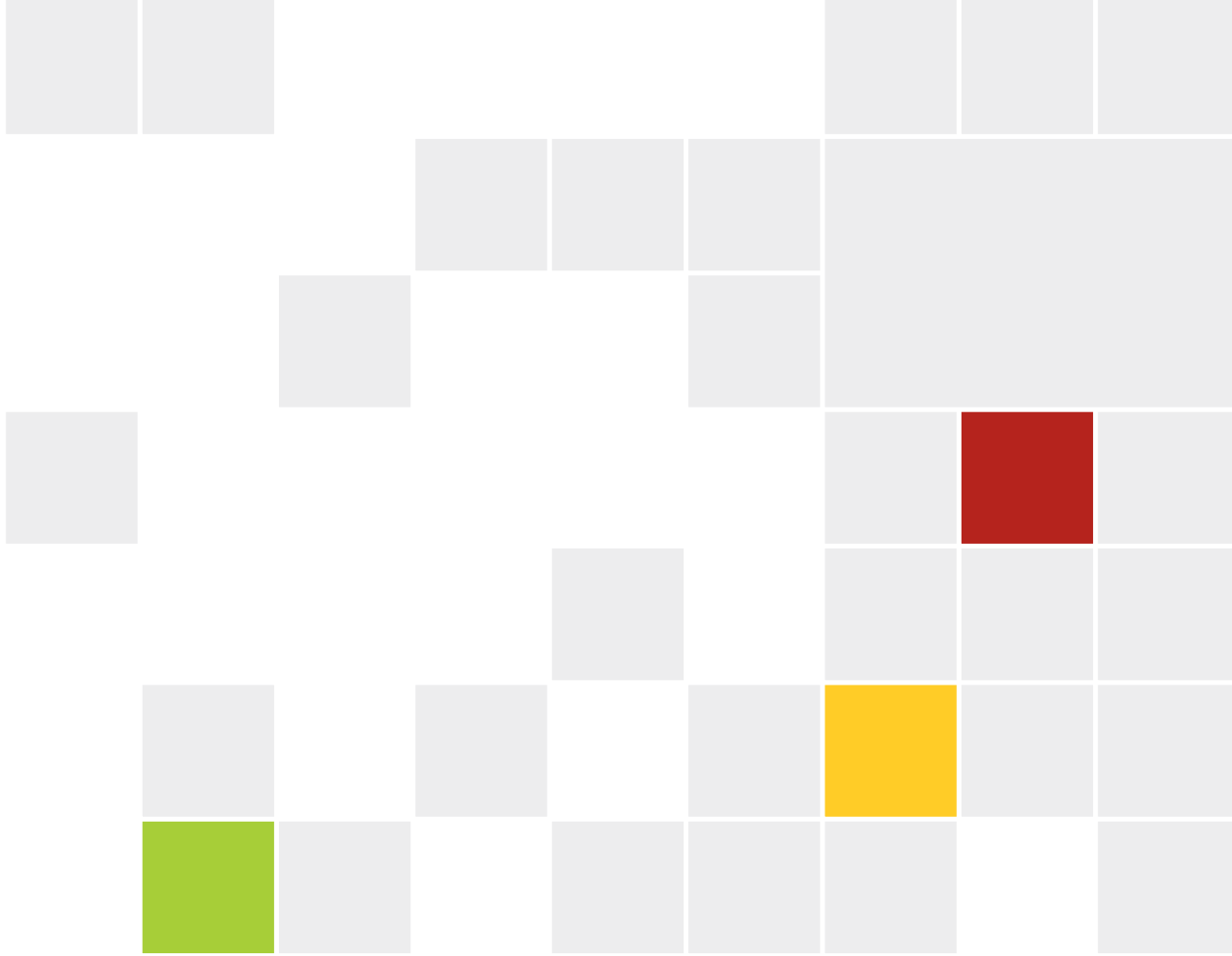
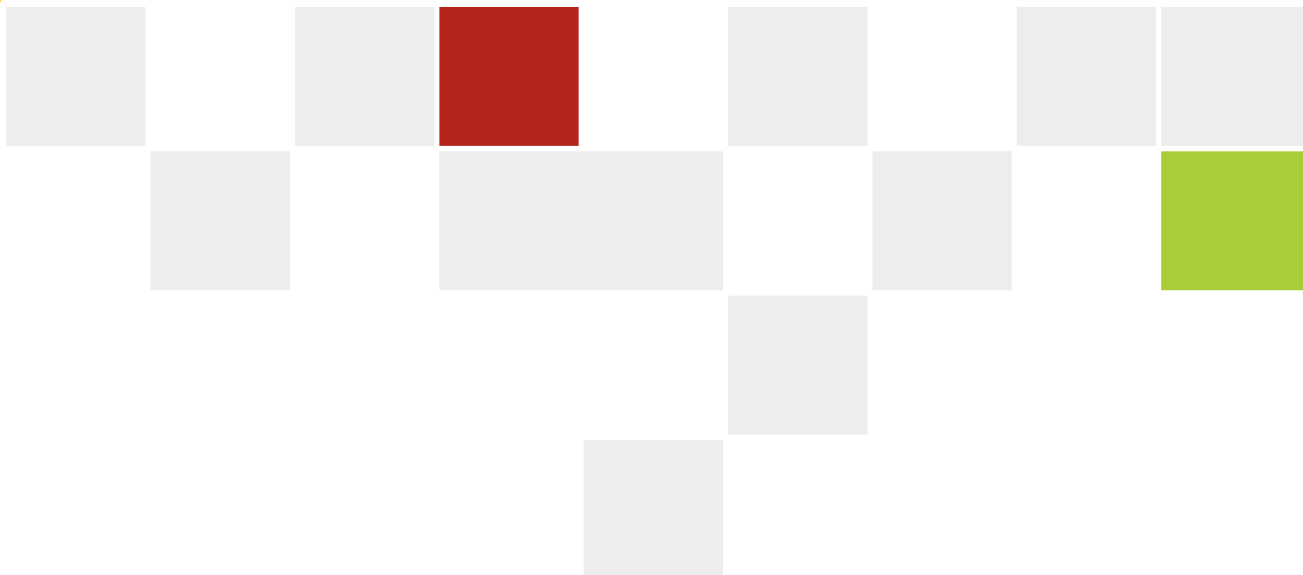




Land off Junction 38, M4, Margam

Planning Statement



Boyer

Report Control

Project:	J38, M4, Margam, Port Talbot
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APPENDIX

Appendix One – Site Location Plan

1. INTRODUCTION

- 1.1 This Planning Statement (PS) has been prepared by Boyer on behalf of our client, Sandvik Osprey, in support of a *“Full planning application of the development of the development of a metal processing facility totalling 28,500sq.m of floorspace comprising a powder processing plant (17,377sq.m), warehouse and store (5,428 sq.m) office building (1,442 sq.m), amenity building (776 sq.m), laboratory (200 sq.m), services building (470 sq.m), substation (107 sq.m), phase 2 (2,700 sq.m), CCTV and parking on-site at J38, M4, Margam, Port Talbot.”*
- 1.2 A Site Location Plan illustrating the location of the application site is included at **Appendix 1**.
- 1.3 The site comprises 6ha of agricultural land to the south of Port Talbot, west of Junction 38 of the M4.

Environmental Impact Assessment (EIA)

- 1.4 An Environmental Impact Assessment (EIA) Screening and Scoping Opinion was provided to Neath Port Talbot County Borough Council (NPTCBC) in June 2021.
- 1.5 An EIA Scoping Opinion was subsequently adopted by NPTCBC in August 2021, which confirmed that the proposals to represent EIA development and accordingly, this application is accompanied by an Environmental Statement (ES).

Pre-Application Consultation (PAC)

- 1.6 In line with Welsh Government legislation regarding new major development, a statutory 28-day Pre-Application Consultation (PAC) period was undertaken between 05th November 2021 and 3rd December 2021, which sought the views of Statutory Consultees and the local community on the proposed development. The process and the comments received are addressed in detail in the accompanying PAC Report.

Statement Structure

- 1.7 This Statement provides a planning assessment and sets out the following information:
- A description of the application site and the background context to the submission (Section 2);
 - An explanation of the development proposal (Section 3);
 - An outline of Pre-Application received from Neath Port Talbot Council (Section 4);
 - An overview of relevant, adopted national and local planning policy (Section 5);
 - An assessment of the relevant planning, design, and technical considerations regarding the proposed development (Section 6); and
 - An overall summary and conclusion (Section 7).

Other Application Documentation

- 1.8 In addition, the planning application is accompanied by the following documentation, which should be read in conjunction with this Statement.
- *Pre-Application Consultation (PAC) Report;*
 - *Planning Drawings including:*

- *Site Location Plan;*
- *Site Layout Plan;*
- *Elevations;*
- *Design and Access Statement (DAS);*
- *Environmental Statement (ES); comprising: Volume 1: Non-Technical Summary; Volume 2: Main Text; and*
- *Volume 3: Technical Appendices.*
- *Landscape and Visual Assessment (LVIA) [included within ES] prepared by Soltys Brewster Consulting Ltd;*
- *Transport Assessment prepared by Apex Transport Planning;*
- *Flood Consequence Assessment and Drainage Report Prepared by JBA Consultants and James and Nicholas Architects;*
- *Phase 1 Habitat Survey prepared by Soltys Brewster Consulting Ltd;*
- *Arboricultural Report prepared by Arboricultural Technician Services Ltd (arbTS);*
- *Ground Site Survey prepared by Reading Agricultural Consultants;*
- *Coal Mining Risk Assessment Note prepared by Terra Firma;*
- *Heritage Report prepared by Cotswold Archaeology;*
- *Agricultural Land Classification Survey prepared by Reading Agricultural Consultants;*
- *Air Quality Assessment prepared by Air Quality Consultants Ltd;*
- *Noise Report prepared by Hunters Acoustics Consultants.*

2. SITE AND CONTEXT ANALYSIS

Site Description

- 2.1 The Site comprises of an irregular parcel of land measuring approximately 6Ha located to the west of junction 38 of the M4, Margam, as demonstrated in the Site Location Plan enclosed at **Appendix 1**, and therefore within the administrative boundary of Neath and Port Talbot County Borough Council.
- 2.2 The Site's current land use is arable farmland that is bound by native hedgerow that wraps around the eastern and southern boundaries that border the A48, Heolcae'r-Bont (Longlands Lane) and the Wales Coastal Path (WCP). To the north and west of the site lies the access road to the adjacent Western Wood Energy Plant and Margam Green Energy Plant that feeds into the A4241 and A48. Beyond this areas of wet woodland are located with the BOC Plant and the Port Talbot Steel Work located approximately 1.13km away.
- 2.3 The currently vacant small holding of Tyn-y-Caeau is located to the immediate north-west and contains an established woodland within its' grounds along the eastern site boundary that is protected by a Tree Preservation Order (Ref. T364). The Grade II Listed Margam Crematorium (Ref. 87732) and Longlands House are found to the south of the site with adjacent playing fields.
- 2.4 In the wider context, Margam Country Park lies eastwards across the other side of Junction 38, M4, with Tata Steel Works to the west. Both Margam and Port Talbot and located to the Northwest at approximately 0.50km and 3.55km, respectively.
- 2.5 Existing access is provided from the Margam Interchange of the M4 via Heolcae'r-Bont (Longlands Lane) to the south, however additional upgraded access is provided by the A4241 Harbour Way Peripheral Distributary Road (PDR) Highway Network Enhancement to the north of the site. An access route follows the western boundary of the site to connect the two roads together that services Margam Green and Western Wood Energy Plants. This road is currently blocked at the midpoint and is subject to adoption.
- 2.6 The Site and specifically the proposed built development is predominantly located outside of the Flood Zone and falls within Development Advice Map Zone A (i.e. considered to be at little or no risk of fluvial or coastal/tidal flooding). Meanwhile parts of the highway and a small catchment to north of the site are identified within Zone B and Zone C2 with the attached Low Flood Risk from rivers, and surface water & small watercourses.
- 2.7 There are no listed buildings within the Site boundary.
- 2.8 The Site is located less than 0.09km from the designated Special Landscape Area (SLA) and Landscape of Historic Interest that contains the Margam Park Historic Park and Garden and Conservation Area within which numerous Grade I and Grade II Listed Buildings and Scheduled Ancient Monuments lie. Scheduled Monuments Mynydd y Castell Camp; Half Moon Camp and Erydd Isaf Round Barrows fall within 2km of the site.
- 2.9 Moreover, 0.44km south of the site lies a Site of Special Scientific Interest (SSSI) at the Eglwys Nunydd Reservoir with the Margam Moors SSSI to the adjacent south-west.

- 2.10 The Site includes trees that do not benefit from Tree Preservation Orders, and these trees will be retained where possible as part of the Proposed Development. The application is supported by an Arboricultural Impact Assessment, which confirms which of these trees will be protected.
- 2.11 An Air Quality Management Area (AQMA) is located to the north of the site and covers the majority of land and properties between the Tata Steel Works and the M4 motorway.
- 2.12 The application land is level to gently sloping at between 10m and 15m above Ordnance Datum (AOD). The slope directs water westward where it drains into a small unnamed watercourse that connects with Upper Mother Ditch. The Welsh government's predictive Agricultural Land Classification (ALC) map indicates the site to be comprised of predominantly grade 3, subgrade 3b, with catchments of grade 2 along the northern boundary line and non-agricultural land sparsely populating the boundary shared with Tyn y Caeau. Reading Agricultural Consultants investigated the ALC identified the site as predominantly subgrade 3a with subgrade 3b located in the north-western corner. Further information can be found within the supporting Agricultural Land Classification (ALC) Survey which accompanies this application.
- 2.13 There are no Public Rights of Ways (PROWs) on or immediately abutting the Site, however the WCP wraps the eastern and southern boundaries that provides a recreational route footpath across the Margam Moors, crossing the main Swansea/Paddington railway and Kenfig river into the Kenfig National Nature Reserve.

Site Context

Site Background, Context and Planning History

- 2.14 The site is located to the west of Junction 38 of the M4 in Margam on the western border of one of Port Talbot's main employment estates. The existing land use falls under arable farmland.
- 2.15 The site has a limited planning history with recent consents and applications submitted in the land adjoining and adjacent.

The Application Site

Application Reference	Description	Decision
P2020/0104	Request for Screening Opinion under Regulation 6 of the Environmental Impact Assessment Regulations 2017 - for the erection of 10 office, industrial and Storage and Distribution units (Use Classes B1, B2 and B8) creating a total of 30,101m ² of floorspace and associated engineering works.	EIA Development. 25 February 2020

Site's Surroundings

- 2.16 The proposed site is located approximately 0.71km south of the nearest residential community of Margam located off the A48 and separated by the Tata Sport and Social club and recreational fields, and bordered by woodland. The proposal would sit 0.66km east of Margam Castle and Orangery and directly adjacent to the east of Margam Green Energy Plant, Western Wood Energy Plant and BOC Gas and Gear. To the south immediately lies Longland House along Heolcae'r-Bont which also provides access to the Grade II Listed Margam Cemetery located over 0.57km from the site.
- 2.17 Notably, the former residential house Tyn Y Caeau that is located on the north-eastern boundary of the site was recently refused planning permission for conversion to a truck stop with café, guest room accommodation and spa facilities. The application is currently under appeal, however remains in abeyance with The Planning Inspectorate, Wales due to additional ES information requested.
- 2.18 The relevant planning history of the adjacent development are stated below:

Margam Green Energy Biomass Plant

Application Reference	Description	Decision
P2020/0671	Section 73 application for the variation of condition 2, (approved plans) and condition 4, (landscape and ecological management plan) to allow for the submission of revised details, of planning permission P2016/0895 approved on 27th January 2017 which related to a single storey office administration building and associated car park.(amended landscape and ecology management plan)	Conditional Approval. 02 December 2020

Application Reference	Description	Decision
P2020/0668	Section 73A application for the removal of conditions 6, 7, 15 and 16, (all relating to landscaping) as its proposed to include a single condition, removal of conditions 10, (construction method statement) 11,(treatment of suspended soils during construction) 12,(Foul and surface water disposal) and 23 (Land adjacent to southern boundary to remain free from development). as these are no longer required, and the variation of condition 2, (landscape and ecological management plan) 4, (noise) 5, (air quality) and 26, (approved plan list) to allow for the submission of a revised details, of planning permission P2016/0949 approved on 14/02/2017, which related to the construction of a biomass power station.(amended landscape and ecology management plan and Air quality summary reports).	Conditional Approval. 02 December 2020
P2016/1070	Installation Of Foul Sewer In Association With Energy Plant. (Amendment to application P2014/0835.)	Conditional Approval. 27 January 2017
P2016/0949	Variation of condition 16 (to list drawing numbers to amend the approved drawing to accommodate minor material changes to the development.) of application P2016/0236 granted on 12/05/16	Conditional Approval. 14 February 2017
P2016/0895	Single Storey Office Administration Building And Associated Car Park. (Amended elevations and sections, Appendix A Flood Consequences Assessment, LEMP Addendum and long section of relationship between car park and attenuation)	Conditional Approval. 27 January 2017
P2016/0236	Variation of conditions 14 & 17 in relation to details of Air Monitoring for Nox equipment and restricted hours of construction of Planning Permission P2014/0705 (Approved on the 26/09/14) in relation to waste wood Biomass fired power station.	Conditional Approved. 12 May 2016
P2014/0835	Installation of underground foul water drainage system (associated with Margam Green Energy Plant)	Conditional Approval. 30 October 2014

Application Reference	Description	Decision
P2014/0705	Construction of 40 MW biomass power station. Amendment to previous application P2008/1409 (Approved on appeal on the 8/3/2011) Changes to layout and design, together with additional fuel conveyor, electricity substation, firewater tank, silo, and water discharge balancing pond.	Conditional Approval. 08 October 2014

Tyn Y Caeau

Application Reference	Description	Decision
P2021/0861	Lawful Development Certificate (existing) to confirm a commencement of works in accord with condition No. 1 of Planning Permission P2005/0449 relating to a change of use to guest house accommodation including the construction of an extensions and the refurbishment of studios.	Awaiting Decision Validated 29 September 2021
P2020/0601	Change of use from dwelling house and annex building into a mixed used development consisting of guest house accommodation consisting of 16 guest rooms, with associated bar, cafe and spa facilities, and truck stop with 21 HGV parking spaces. The proposal includes the demolition of an existing single storey rear extension, and the erection of a single-storey rear extension, together with widened site access, additional internal access roads, parking areas and associated works. (Bat survey and mitigation submitted 18/09/2020)	Refused. 15 October 2020 Subject to appeal under reference: APP/Y6930/A/20/3263628
P2006/1396	Proposed Guest House Extension and Refurbishment	Conditional Approval. 22 November 2006
P2005/0449	Proposed Guest House Including the Construction of An Extension And The Refurbishment Of Existing Studios	Conditional Approval. 25 May 2005

Margam Biomass

Application Reference	Description	Decision
P2008/1409	Biomass Fired Power Station.	Refused, Allowed on Appeal. 16 March 2010

P2007/0826	Biomass Fired Power Station	Conditional Approval. 18 September 2007
P2006/0161	Relocate The Western Log Co (Use Classes B1, B2, B8 and A2)	Conditional Approval. 09 January 2007
P2004/0035	Proposed Bio Mass Power Plant	Conditional Approval. 27 April 2004

Harbour Way (Peripheral Distributor Road)

Application Reference	Description	Decision
P2012/0189	Construction of access road to link Biomass 2 to Peripheral Distributor Road (Stage 2).	Conditional Approval. 06 March 2014
P2010/1100	Construction of the Port Talbot Peripheral Distributor Road Stage 2. Amendment to application P2007/292 approved 28th August 2007.	Conditional Approval. 24 February 2011
P2007/0292	Construction of The Port Talbot Peripheral Distributor Road Stage 2.	Conditional Approval. 28 August 2007

- 2.19 There are two Sites of Importance for Nature Conservation (SINCs) within approximately 1.5km radius of the site and clustered to the south-west. The nearest being the Eglwys Nunydd Reservoir Site of Special Scientific Interest (SSSI) and the Margam Moors SSSI located to the adjacent west of the reservoir. Further south the Cynffig SSSI and Special Area of Conservation (SAC) is found along the coastline that stretches south from Margam Sands.
- 2.20 The Site is located within the vicinity of several Scheduled Ancient Monuments (SAMs) that are detailed in the supporting Historic Environment Desk-Based Assessment produced by Cotswold Archaeology.

3. PROPOSED DEVELOPMENT

- 3.1 The proposed development, as described on the submitted planning application form, is as follows:

Full planning application of the development of a metal processing facility totalling 28,500sq.m of floorspace comprising a powder processing plant (17,377sq.m), warehouse and store (5,428 sq.m) office building (1,442 sq.m), amenity building (776 sq.m), laboratory (200 sq.m), services building (470 sq.m), substation (107 sq.m), phase 2 (2,700 sq.m), CCTV and parking on-site at J38, M4, Margam, Port Talbot.

- 3.2 The purpose of the proposal is to relocate the existing Sandvik Osprey metal processing facilities currently located on a property off Milland Road, Neath to Junction 38, Margam. Sandvik Osprey is the world's largest fine metal powder producer, thereby the proposal seeks to provide greater manufacturing capacity and workforce to meet the unprecedented demand for fine metal powder generated by the growth of metal 3D printing. It is intended that the proposal will fall into use classes B1, B2 and B8, providing a total developed area of approximately 4.86ha, totalling a Gross Floorspace Area of 28,500 m² comprised of:

Table 1 Gross Floor Area of the Development Proposals

Development Proposal	Floor Space (m ²)
Powder Processing Plant	17,377
Warehouse and Store	5,428
Office	1,442
Amenity	776
Lab	200
Services Building	470
Substation	107
Gross Floor Area	28,500

- 3.3 Approximately 0.55ha is proposed for parking, comprised of 170 spaces with provisions for 11 disabled parking bays and 18 Electric Vehicle (EV) charging points. Roadways and the main yard measure approximately 1.188ha.

- 3.4 The production building is proposed to be split into a number of areas and have the following functions:

- *Powder Atomisation: Melting of metal within a furnace and gas atomisation of molten metal.*
- *Powder Processing: Classification of metal powder sizes from atomisation.*
- *Raw material handling and allow preparation.*
- *CE Alloys: Machining of parts.*
- *Warehouse and Stores: Storage and dispatch of product.*

- *Engineering: Maintenance and production support.*
- *Lab: Metallogical testing.*

- 3.5 The powder processing plant would be split into three sections, comprised of 1-3 storeys, and have a maximum building height of 16.5 metres. Similarly, the warehouse and store element would be one storey and have a building height of 16.5 metres. The lab would have a proposed maximum height of 4/6 metres and accommodate ½ storeys. There will be no external emissions or effluent.
- 3.6 The Amenity Building will stand two storeys tall with a maximum height of 9.9 metres and encompass a rest area, changing area and washing/showering facility.
- 3.7 The proposed office will operate as a general office for the site, stand part single storey, part two storeys tall with a maximum height of 8.7 metres.
- 3.8 The services building would sit within an enclosed compound and stand one storey tall with a maximum height of 9.0 metres. Within the services compound an Argon tank is proposed that would stand approximately 16.0 metres tall.
- 3.9 The proposed substation unit would comprise of a single storey switch room measuring 5.0 metres in height.
- 3.10 The following substances are to be used on site and storage of hazardous materials:
- *Raw Materials: Ni, Co, Cr, Fe, Al, etc. all in solid form.*
 - *Revert Powders: Stored in sealed drums on pallets (of above metal alloys).*
 - *Large dump material (solid metal) stored on pallets (of above metal alloys).*
 - *Refractory Materials: 25Kilo bags on pallets.*
 - *N and Ar: Pressurised buffer tanks.*
 - *Lubricants and Oils: Plastic 25L containers stored in self-contained bunded units.*
 - *Smaller substances (paints, glues, resins etc.) used on site are stored in chemical cabinets in stores.*
- 3.11 Where the metal powder production process requires a large quantity of inert gas, the relocation to Junction 38 will permit a direct piped gas connection with the adjacent BOC industrial gas production plant. This will improve the current arrangement at the Neath site that is supplied by at least two road tankers per day.
- 3.12 The proposed development is envisaged to provide a reduction in operating costs and carbon footprint, whilst delivering improvements to safety and air quality of the existing community within Neath Port Talbot.
- 3.13 The proposed design of the development is as follows:

Masterplan

- 3.14 The development site's masterplan is comprised of three interlinked zones, one for the office block, amenity building and open space, and the main factory building with supporting services. Each zone is accessed through a series of landscaped footpaths and are connected by two main vehicle highways that serve staff vehicles, and industrial and operational traffic separately. Two vehicle access points will be provided to the north and north-west of the site and service the two proposed vehicle routes. A single pedestrian access gate will be provided along the southern boundary to Heolcaer-Bont (Longlands Lane). Green landscaped borders surround the edges of the development site and provide a buffer to the surrounding context. Where possible, existing trees and native hedgerow have been retained alongside existing landscape features to enhance the green space provided on site.

Main Factory Building

- 3.15 The proposed factory building will have an L-shaped configuration and sit along the southern tree lined boundary of the site along Longlands Lane (Heolcae'r-Bont). The building would be situated on land that features a slight incline.
- 3.16 The western half will accommodate the atomising machinery and facilities, charge preparation, furnace preparation, sizing, and aluminium sizing. The eastern elevation of the western element would feature a loading bay that accesses both the charge and furnace preparation areas. The western element would measure 16.52m (H) x 60.65m (W) x 135.00m (D). A laboratory will be located adjoining the two halves and be access separately to the main building. Access doors would be located on all elevations and also provide fire exits. In total 2 no. loading bays will be provided along the eastern elevation and feature 6.00m x 6.00m roller shutter doors.
- 3.17 The eastern half will provide warehouse and storage, FLT charging, welding bay, engineering, and CE Alloys facilities. Additional space is proposed within the eastern half that forms phase 2 of the development. The eastern element would measure 16.53m (H) x 89.35m (W) x 60.00m (D). Phase 2 would form an additional 45.00m extension to the eastern element providing a total width of 134.35m. The combined width of the western and eastern element (including phase 2) would total 195.00m. Access doors will be located on all elevations and also provide fire exits. In total 3x no. loading bays will be situated on the northern elevation, each loading bay will feature 6.00m x 6.00m roller shutter doors.
- 3.18 The external construction materials would be comprised of horizontally spanning cladding consisting insulated flat trespa panels in the colour grey with blue vertical strips every 1/4th row. This material will provide a graduated colour finish from darker at ground level to a lighter tone at roof level. A shallow pitched roof with parapet is proposed that would feature a gutter behind which connects to a series of rainwater pipes located along each elevation.

Office Building

- 3.19 The proposed office block will be located in the northern field to the west of the main access route from the Harbour Way (A4241)/A48 roundabout. The proposed office will benefit from two car parks, a modest car park of 7 spaces to the north and larger car park to the south with a capacity of 55 spaces. Five accessible car parking spaces will be provided. The office block will be part single storey, part two storey with a flat roof design at a maximum height of 8.70 metres along the northern elevation. Fenestrations and access doors will be provided to all elevations with a stronger glazed element to the principal elevation to the north. Sandvik signage is to be located on the northern and eastern elevations at first floor level. The main access will be provided to the northern elevation of the two-storey component with a secondary entrance proposed to the south.
- 3.20 The two-storey element will measure 8.70m (H) x 28.98m (W) x 16.57m (D). The single storey element will measure 4.65m (H) x 14.13m (W) x 30.31m (D). The single storey element would project 13.68m beyond the two-storey element and have a modest wraparound element to the south.
- 3.21 The external building materials would comprise of:
- *Polyester powder coated aluminium double-glazed commercial grade doors;*
 - *Glazed powder coated aluminium panels;*
 - *Glazed powder coated aluminium windows;*
 - *Micro ribbed horizontal insulated cladding panels;*
 - *Insulated secret fix smooth faced composite horizontal wall panels;*
 - *Steel doors to plant room;*
 - *Glazed powder coated aluminium bi-folding doors; and*
 - *Nylon coated steel handrail with glazed panels;*
- 3.22 The office block will provide open plan workstations, single person and shared offices, training and breakout rooms, board rooms, and toilet and shower facilities at the ground floor. At first floor level additional meeting rooms, stores, toilet, and shower facilities will be provided with a larger conference room and roof top terrace.

Amenity Building

- 3.23 The amenity building is proposed for the east of the site, north of the main factory building and to the south of the large eastern car park. The building would be comprised of a single storey and two-storey element both with asymmetric pitched roof designs and joined by single storey flat roof extension. The main entrance will be located on the eastern elevation and provide access to training rooms, changing rooms, locker storage, an office and medical room, and shower and toilet facilities. The single storey element would contain the proposed canteen common area.
- 3.24 The proposed single storey element would measure 6.15m (H) x 12.12m (W) x 18.73m (D). The pitched roof would have an eaves height of 3.89m and the flat room element would measure 3.00m to the eaves. The two-storey element would measure 9.95m (H) x 13.41m (W) x 22.00m (D). The pitched roof would have an eaves height of 7.08m to the south.
- 3.25 The external building materials would comprise of:
- *Insulated secret fix smooth faced composite horizontal wall panels;*

- *Profiled insulated composite cladding roof panels;*
- *Micro ribbed vertical insulated cladding panel;*
- *Glazed powder coated aluminium windows;*
- *Polyester powder coated aluminium double-glazed commercial grade door;*
- *Steel doors to plant room;*

The Gatehouse / Security Area

- 3.26 The gatehouse / security area is proposed to be located at the north-western access point. This area will be self-contained and manned by a security personnel. This will include a security barrier for additional surveillance.
- 3.27 The gatehouse would measure 2.70m (W) x 2.20m (D).

Services and Substation Buildings

- 3.28 The proposed services building would measure 9.00m (H) x 15.00m (W) x 31.00m (D) and be located along the western boundary to the south of the proposed operational vehicle access route. The services building would be constructed from the same cladding material as the main building and feature a flat roof. Access doors will be located on the eastern elevation with a roller shutter door loading bay located on the western elevation. The building would be surrounded by a 2.40m high palisade fence with access gates to the north and south of the services compound.
- 3.29 An argon tank will sit within the compound area, measuring 16.16m in height with a 3m diameter. The tank itself has no moving parts but will supply a number of pumps that were in the original plan, although lorries will have to service / refill the tank from the adjacent BOC site.
- 3.30 The proposed substation would be located 37.00m to the south of the services compound and measure 5.00m (H) x 14.64m (W) x 13.86m (D). The building would be constructed from the same materials as the main building and feature a flat roof design. Access doors will be located on the northern elevation.

Phasing

- 3.31 The proposed development's timescale and phasing is comprised of five key phases shown in the table below:

Phase	Timescale
Planning Consent	June 2022
Construction Phase	August 2022 – December 2023
Equipment Phase 1 Install	December 2023 – May 2024
Phase 2 Equipment transfer from Neath	June 2024 – May 2026
Decommission and Sale of Neath	July 2026

- 3.32 Upon receipt of planning consent, the construction phase is due to commence and involves enabling works, site earthworks, access works, main site drainage, construction of foundations, structures, and external landscaping.

- 3.33 The final phase envisages the decommissioning of the Neath site with plants individually moved across to Margam depending on production and customer acceptance. There is potential for some contamination from the site's previous use, having seen over 150 years of industrial use. The existing buildings are to remain followed by the sale of the site in July 2026.
- 3.34 Altogether, the phasing would take place over just short of 4.5-year period and is anticipated to commence in June 2022.

Processing Plant, Machinery and Operations

- 3.35 Operations at the existing metal plant in Neath involve all relevant material processing for Sandvik manufacturing and machining solutions for additive manufacturing of inert gas powders. The current Neath site contributes to the world leading Osprey metal powders for additive manufacturing, metal injection moulding and hot isostatic pressing that offers more than 2,000 metal powder grades. These processes involve powder sizing and particle sizes of 5-80 micron and present in-house powder manufacturing capabilities for inert gas atomisation and vacuum inert gas atomisation. Powder by Sandvik provides the possibility to customise or optimise materials to application or process, from small lots for prototype development up to high volume batches for large scale production – from 20kg up to 6000*kg batches.
- 3.36 Current operations are comprised of two main functions (listed below), however exclude aluminium brazing products:
- *Fine metal powders (76%)*
 - *Controlled Expansion Alloy (CEA) Products (24%)*
- 3.37 Specific processing machinery, not presently on-site at the existing facility, may be introduced depending on the results of testing activities and market approaches which could lead to the creation of additional products and services.

Operating hours

- 3.38 The intended hours of operation would be 24/5 production in the main production building from Sunday night 22:00 to Saturday morning at 06:00. There is potential for possible operation on Saturday and Sunday 06:00-14:00 overtime.
- 3.39 The site operations would see around 2-10 HGV vehicle movements per day.
- 3.40 The proposed office staff would have core hours of 07:00 – 18:00.

Site Access and Parking

Access

- 3.41 Access to the proposal would be provided from the existing highway network that branches out from the Harbour Way (A4241) roundabout interchange and Longlands Lane (Heolcae'r-Bont) to the south.

- 3.42 The main vehicle access route would form an extension of an existing spur on the northern boundary with secondary access for operational HGV traffic located 60m to the west, along the north-western boundary in the form of a new priority junction. Both of which provide appropriate geometry and visibility splays to be considered safe and suitable to accommodate the development proposal. Moreover, the proposal can appropriately accommodate service and delivery vehicles that can enter and exit the site in forward gear. Vehicles are able to reverse against the proposed service bays throughout the site and turn in the areas provided without conflict.
- 3.43 Following discussion with NPTCBC Highways Officers, the north-western access would provide right-turn only when exiting the site. Suitable signage would be installed to inform HGV drivers that left turn movements are not allowed.
- 3.44 Vehicular access will be split into domestic/office block traffic to the north of the site and industrial freight and service traffic to the north-west by two separate access points. The internal layout and circulation will encourage the separation of domestic and industrial vehicles, however access between the two will be provided to the east of the site. The internal access roads would be subject to 20mph speed restrictions with the road's geometry assisting in enforcing these speeds.
- 3.45 Pedestrian access will remain separate from vehicle movements and be integrated throughout the site to connect the two functions and ensure a permeable and accessible amenity open space is provided. Pedestrian crossings are also provided at appropriate locations within the site with suitable inter-visibility.
- 3.46 In terms of pedestrian and cycle access, the site is well connected to existing walking and cycling routes and active travel network along the shared footway/cycleway of the A48 which connects the site to the surrounding Margam and Port Talbot residential areas.
- 3.47 For further detail, please refer to the submitted Transport Assessment completed by Apex Transport Planning.

Car / Cycle Parking

- 3.48 A total of four car parks deliver 170 car parking spaces that would provide the following:
- *Southern car park – 10 spaces*
 - *Main car park – 98 spaces (6 disabled, 10 electric vehicle charging)*
 - *Secondary car park – 55 spaces (4 disabled, 6 electric vehicle charging)*
 - *Northern car park – 7 spaces (1 disabled, 2 electric vehicle charging)*
 - ***Total car parking – 170 spaces (11 disabled, 18 electric vehicle charging)***
- 3.49 All spaces will measure 2.6m x 4.8m in line with the SPG. An additional 1.2m hatched area has been provided to disabled spaces for those with mobility impairments to enable safe access to vehicles. Where needed, step free access has been provided via suitable dropped kerbs and crossings close to building entrances.
- 3.50 Electric vehicle charging ports will be provided for 18 vehicles and will be distributed across the site.

- 3.51 Due to the forecasted HGV movements on site, there would not be a significant demand for operational parking for large vehicles. However, a dedicated area for operational parking is provided on the east and west sides of the main building.
- 3.52 The Site's cycle parking accords with cycle parking standards set out in the SPG. Overall, the proposed development will provide covered cycle shelters in two locations across the Site that accommodate 56 cycles, as well as a further 28 cycle stands for visitor use, collectively providing cycle storage for 84 cycles. Each shelter will be located in close proximity to the building entrances as shown on the masterplan, and cycle parking will be monitored as part of the travel plan.

Sustainability

- 3.53 Bus stops are conveniently located within walking distance (within 800 to 1.2km) and provide a good frequency of services to surrounding residential areas, Port Talbot bust station and Port Talbot Parkway Rail Station and therefore suitable for commuting journeys. Taking account of the surrounding existing employment area, a good level of sustainable travel is already present and therefore supporting walking, cycling and public transport journeys on the transport network. Due to the site's location within an established industrial estate, it will promote and encourage sustainable travel behaviour and attract a workforce who choose to travel by sustainable modes. This will assist in constraining the level of vehicle generation from the site and minimise the impact of the development on the highway network.
- 3.54 The site benefits from the adjacent good quality National Cycle Network Route 4 that links to the site access road and services London to Fishguard.

4. PRE-APPLICATION ADVICE

- 4.1 A formal request for discretionary Pre-Application Advice was submitted to NPTC in June 2021 in respect of the proposed metal processing facility at the application Site. Written advice was subsequently received in September 2021, which is attached at **Appendix 3**.
- 4.2 In providing their response, the Case Officer indicated that, subject to a number of detailed comments in respect of technical matters, that elements of the proposal would be acceptable provided that additional reports and information accorded with LDP policy. More detailed comments were received detailing matters of biodiversity and are provided below.
- 4.3 In terms of additional, material planning considerations relevant to the site, it was considered that additional information on the following technical matters would need to be addressed as part of the planning application:
- *Car parking provision*
 - *Secure cycle parking provision*
 - *Landscaping and green infrastructure provision*
 - *Biodiversity enhancements and mitigation*
 - *Electric vehicle charging facilities*
 - *Design techniques and proposed materials*
 - *Boundary treatment*
 - *CCTV scheme*
- 4.4 Biodiversity comments were supplied in response to our request that outlined the following areas for consideration in the proposal:
- *Assessment of the impacts to biodiversity and natural features and mitigation.*
 - *An extended phase 1 habitat survey to identify a balance of s7, LBAP, and SINC habitat loss and gain for the scheme.*
 - *Bat surveys*
 - *Hydrological connection to adjacent SINC and nearby SSSI*
 - *Potential air quality affects*
 - *Assessment of ecosystem resilience*
 - *Assessment of impact upon bird habitats*
 - *Mitigation and compensation for identified adverse impacts*
- 4.5 Following the receipt of these comments, various amendments have been made to the development proposal in accordance with the pre-application response to minimise the potential impacts and are outlined below.
- 4.6 Due to discussion surrounding the Health and Safety Executive consultation and high-pressure zones, the previously proposed 3x no. office buildings have been combined into one and moved to the northern field outside of the zone. Not only does this address concerns regarding health and safety but also reduce the capacity of the car parking provided on site. This relocation further strengthens the 'placemaking' of the development to provide a stronger street frontage, creating a sense of place and identity for the site whilst providing natural surveillance and security.

- 4.7 During the pre-application process amended site layout plans were submitted on 23 July 2021 and assessed accordingly. NPTCBC considered subject to the design that the site layout would be acceptable and create *‘a better sense of place and a suitable streetscene, while also resulting in a more secure site.’* The revised site layout plan and parking provision were deemed to have *‘a less intrusive design that also meets the needs of the development.’* Recognition was also given to the careful consideration to retain the areas of trees located within the site and noted the attractive treed area provided forming Open Space Provision. Additional alterations to the development proposal’s design and materials have resulted in the use of horizontally spanning cladding comprised of insulated flat trespa panels for the main factory building and will be grey in colour with blue vertical stripes every 1/4th row.
- 4.8 The reduction of car parking provision from 300 to 170 appropriately addresses NPTCBC’s concerns raised and are spread across two key areas for officer workers in the northern field and factory workers to the east. Additional visitor parking is provided along the northern frontage adjacent to the northern access route. In total 11 accessible parking spaces and 18 EV charging points are distributed across the site. Further amendments have been made to accommodate various high value trees that surround the eastern car park and reconfigure the proposed parking layout design. The car parking provisions have been suitably amended to ensure an efficient and appropriate use of land in line with LDP policy, Supplementary Guidance and Welsh Government Planning Guidance.
- 4.9 In addition to the office building relocation, the proposed amenity building has been altered to fit the scheme with the addition of a canteen extension to the northern elevation, having been reduced in size and orientation altered. An extra storey is also proposed to the amenity block to accommodate additional offices and breakout spaces for the work force.
- 4.10 The vehicular and pedestrian access to the site was also revised to enable an additional pedestrian route along the southern boundary to Heolcae’r-bont and provide a secondary emergency route to the service area. Widening of the main vehicle access to the factory has also taken place to improve operational accessibility. This route also services the newly proposed pumping station, revised services compound, and substation along the western boundary of the site.
- 4.11 The proposed security measures have been strengthened on site with drop down barriers to the northern access route, additional security gates, paladin fencing, and palisade fencing located throughout the site. A comprehensive lighting and CCTV scheme will also support these security measures. Moreover, a dedicated security area will be located at the north-western site entrance and include a manned gatehouse to monitor operational traffic in and out of the site.
- 4.12 Following the pre-application meeting, the configuration of balancing ponds has undergone various amendments to reflect design and layout changes alongside the publication of the updated TAN15 flood maps. Initially proposed to the south of the office building located within the northern field, the finalised drainage scheme located the attenuation pond to the east of the office block adjacent to the access road.
- 4.13 Additional landscaping and footpaths are proposed to provide better pedestrian connection between the northern and southern field with various pedestrian crossings proposed throughout the site.

Pre-Application Consultation (PAC)

- 4.14 In accordance with the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, the PAC process took place for the statutory 28-day period between 05th November 2021 and 03rd December 2021. However, responses were accepted up to the submission date to allow for any late comments.
- 4.15 As detailed in the submitted PAC Report, further amendments were made following comments received from statutory consultees that informed the design evolution of the proposed development.
- 4.16 A key alteration that took place was the relocation of the western access point to the north-western boundary in line with NPT Highway Officer's recommendation. This in turn informed the new proposed layout of the development and therefore meant the drainage scheme, Green Infrastructure Plan and landscaping were revisited to accommodate the new access road. The amendments would ensure, where possible, hedgerow and higher category trees would be retained.
- 4.17 Together these revisions are considered to lessen the potential impacts of the development. This is discussed in greater detail later within this statement and the accompanying ES, in addition to other technical reports submitted in support of this application.

5. PLANNING POLICY CONTEXT

Introduction

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 An assessment of both National Planning Policy and Local Planning Policy has been undertaken.
- 5.3 Material considerations at a national level include:
- *Planning Policy Wales (PPW) Edition 11, published December 2021; and*
 - *Technical Advice Notes (TANs), including:*
 - *TAN 5: Nature Conservation and Planning*
 - *TAN11: Noise (October 1997)*
 - *TAN 12: Design*
 - *TAN 15: Development and Flood Risk (July 2004)*
 - *TAN 18: Transport*
 - *TAN 21: Waste*
 - *TAN 23: Economic Development*
 - *TAN 24: The Historic Environment*
- 5.4 In terms of Local Planning Policy, the 'Development Plan' in this case comprises the Neath & Port Talbot Local Development Plan (LDP), adopted January 2016 and Future Wales: The National Plan 2040, adopted 2021.
- 5.5 The remainder of this Section highlights relevant policy and guidance within the LDP, followed by a review of other relevant documents identified above.

National Planning Policy and Guidance

- 5.6 The Council will also refer to Government guidance contained within Planning Policy Wales 11 (February 2021) and Technical Advice Notes.

Planning Policy Wales – Edition 11 (February 2021)

- 5.7 Welsh Government planning policy is contained within Planning Policy Wales Edition 11 (PPW), which was published in February 2021.
- 5.8 This has been prepared in the context of the Well-being of Future Generations Act (2015), which places a duty on public bodies to carry out sustainable development. It requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental, and cultural.
- 5.9 Chapter 5 of PPW addresses the productive and enterprising placemaking and well-being that is provided through well-connected employment and sustainable economic development that create and renew hubs of economic activity around sustainable transport nodes which capitalise on their location and the opportunities which this presents.

- 5.10 Section 5.4 details the importance of strategic economic development that seeks to maximise opportunities to strengthen a foundational economy and steer economic development in the most appropriate locations. The development of land for activities that generate sustainable long-term prosperity, jobs and income is encouraged through the management of allocated strategic employment sites and uses. Support is given to innovative, emerging technology and high value added sectors such as advanced engineering in their role they play in terms of investment and job creation.
- 5.11 Paragraph 5.13.4 establishes the Welsh Government's Towards Zero Waste policy that supports facilities that align with the priority order of their waste hierarchy. 5.13.13 sets out the need to support a transition towards circularity of materials through the provision of facilities that provide high efficiency and high-quality reuse and recycling. All of which is set in the context of promoting a circular economy, to reduce unnecessary waste and encourage high quality manufacturing.

Technical Advice Notes

TAN 5: Nature conservation and planning (2009)

- 5.12 TAN 5, at paragraph 5.1.6, states "Local planning authorities, along with other public bodies, have a duty to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which SSSIs are of special scientific interest".

TAN 11: Noise

- 5.13 TAN 11 advises how the planning system can operate to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly costs or administrative burdens of business. The guidance sets out the main considerations when determining applications which will be exposed to existing noise sources or generate noise. Sections B17 and E12 advise on noise at work for the protection of employees from exposure to excessive noise, noise rating levels, generation, and character from industrial developments.

TAN 12: Design

- 5.14 TAN 12 details the route to good design through the design process and assessment of overarching design issues. Section 5.12 states the importance of design for employment areas to add value to commercial property, support the image of modern businesses and encourage further investment, whilst ensuring that new premises are integrated into their surroundings.

TAN 15: Development and Flood Risk

- 5.15 TAN 15 advises caution in respect of new development in areas of high flood risk by setting out a precautionary framework to guide planning decisions. This technical advice notes identifies general industrial and employment development as less vulnerable land uses to flooding.

TAN 18: Transport

- 5.16 TAN 18 provides advice on the integration between land use planning and transport, location of development, parking, design, walking and cycling, public transport, infrastructure and the assessment and management of impacts and implementation. Point 3.7 highlights the importance for identifying locations for major travel generating uses that offer genuine and easy access that consider the potential for changing existing unsustainable travel patterns through a co-ordinated approach to LDP allocations and transport improvements.

TAN 21: Waste

- 5.17 TAN 21 details how the planning system should contribute towards sustainable waste management and resource efficiency which feeds into the Welsh Government overarching waste strategy 'Towards Zero Waste'. This document sets out planning considerations that take into account the social, economic, and environmental outcomes of waste management facilities in the Welsh Government's commitment towards sustainable development.

TAN 23: Economic Development

- 5.18 TAN 23 principally deals with development that falls within the B-classes and recognises the whole-economy contribution to economic growth. TAN 23 promotes a planning system that recognises the economic aspects of all development and delivers planning decisions which balance social, environmental, and economic considerations in the interest of sustainability.

TAN 24: The Historic Environment

- 5.19 TAN 24 sets out the best practice for planning decisions that deal with listed buildings, schedule monuments, and conservation areas relating to designation and consent procedures with registered historic assets. Guidance is provided that considers the historic environment's cultural context, historic assets and contribution to the character and sense of place of different parts of Wales during decision making.

Neath & Port Talbot Local Development Plan

- 5.20 The Site lies within the designated Strategic Employment Site **Policy EC1/2+** (Land off J38, M4, Margam) of the Neath & Port Talbot LDP with the attached use classes of B1, B2 and B8 permitted. Supporting text at paragraphs 5.2.13 -5.2.16 note that the strategic employment allocation at J38 has excellent transport links, lying to the south of the proposed Harbour Way PDR Network Enhancement, adjacent to the A48 and M4, and near to numerous existing employment and industrial operations. Furthermore, at paragraph 5.3.112 of **Policy W1** the LDP identifies the preferred site as appropriate for the provision of new in-building waste treatment facilities.
- 5.21 **Policy SP 11 Employment Growth** sets out the criteria for the assessment for new and expanding employment developments whereby:
- *96 Ha of land for employment and business purposes will be allocated for development within the Plan period in the Coastal Corridor Strategy Area to meet economic development and employment needs;*

- *Additional employment provision will be made within the Strategic Regeneration Areas as part of mixed use, sustainable development in these locations;*
- *Existing employment areas will be safeguarded for employment uses;*
- *Premises in existing appropriate and lawful employment use will be safeguarded for employment purposes;*
- *Employment uses will be encouraged in principle within settlement limits;*

5.22 SP11 recognises the sites' location within the Costal Corridor as an area of highest market demand with easy access to the strategic road and freight networks.

5.23 The following policies are also of relevance to the proposed development:

Policy	Topic
SP1	Climate Change
SP2	Health
SP3	Sustainable Communities
SP4	Infrastructure
SP5	Development in the Costal Corridor Strategy Area
SP11	Employment Growth
SP15	Biodiversity and Geodiversity
SP16	Environmental Protection
SP18	Renewable and Low Carbon Energy
SP19	Waste Management
SP20	Transport Network
SP21	Built Environmental and Historic Heritage
SC1	Settlement Limits
SC2	Protection of Existing Community Facilities
I1	Infrastructure Requirements
OS1	Open Space Provision
EC1	Employment Allocations
EC2	Existing Employment Areas
EC3	Employment Area Uses
EC4	Protection of Existing Employment Uses
TO4	Walking and Cycling Routes
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
EN8	Pollution and Land Stability
EN9	Developments in the Central Port Talbot Area
RE2	Renewable and Low Carbon Energy in New Development
W3	Waste management in New Development
TR2	Design and Access of New Development
BE1	Design

5.24 These policies relate to the general approach to new development as well as environmental considerations. Therefore, they are considered in more detail in Section 5 (key planning considerations), as well as in the suite of technical information submitted with the application.

5.25 At a local level, relevant Supplementary Planning Guidance (SPG) include:

- *Planning Obligations (October 2016)*
- *Parking Standards (October 2016)*
- *Pollution (October 2016)*
- *Open Space and Greenspace (July 2017)*
- *Renewable and Low Carbon Energy (July 2017)*
- *Design (July 2017)*
- *Landscape and Seascapes (May 2018)*
- *Biodiversity and Geodiversity (May 2018)*
- *The Historic Environment (April 2019) (incl. Schedule of Buildings of Local Importance and SPG: Schedule of Designated Canal Structures)*

Supplementary Planning Guidance

Planning Obligations (October 2016)

5.26 The SPG sets out relevant planning obligations that will be sought by the council from developers, for example towards transport and social infrastructure.

Parking Standards (October 2016)

5.27 This document sets out the required standards for parking provisions and the relevant matters that need to be considered in the planning of parking facilities of new developments. Guidance is provided on the submission of travel plans and sustainability considerations in acknowledgement of the wider policy context, application of parking standards and parking requirements.

Pollution (October 2016)

5.28 The Pollution SPG addresses each of the type of pollution, their causes and impacts on Neath Port Talbot that need to be considered and sets out the required steps to ensure avoidance and mitigation methods comply with relevant policy. The guidance provides a brief outline of the LDP's allocations in relation to the Habitats Regulations Appraisal (HRA) requirements.

Open Space and Greenspace (July 2017)

5.29 The Open Space and Greenspace SPG defines open space and its provision in Neath Port Talbot. Guidance details Open Space provision for employment and commercial development alongside practical guidance that identifies policy thresholds for the implementation of amenity space in an attempt to improve the health and well-being of the workforce.

Renewable and Low Carbon Energy (July 2017)

5.30 This SPG details the relevant criteria and all types of renewable and low carbon energy technologies that are involved in the implementation of policy. The document provides matters for consideration that are covered within the assessment of landscape and visual impacts, identifies thresholds and requirements that inform the division and phasing of sites. Lastly the document recognises the community benefits of low carbon technology.

Design (July 2017)

- 5.31 The Design SPG provides a character and context study of Neath Port Talbot, followed by a detailed guidance on the implementation of Policy BE1 Design. The documents also address the key strategic development areas and relevant design consideration for different development types and the County's 'Gateways.' Key issues are provided for commercial development, setting out the aims and objective for good design in both commercial and industrial development.

Landscape and Seascape (May 2018)

- 5.32 The Landscape and Seascape SPG identifies and evaluates the impacts of change and development on Neath Port Talbot's land and seascapes and the role Landscape and Visual Impact Assessments hold in understanding their significance. The guidance highlights how development can affect specific views, visual amenity and the cultural and historic association to the landscape and seascape.

Biodiversity and Geodiversity (May 2018)

- 5.33 The SPG provides information and establishes the council's expectations for all development proposals to protect, conserve, enhance and manage the full range of biodiversity and geodiversity features, habitats, and interests across Neath Port Talbot.

The Historic Environment (April 2019) (incl. Schedule of Buildings of Local Importance and SPG: Schedule of Designated Canal Structures)

- 5.34 The Historic Environment SPG delivers an overview of the historic environment of Neath Port Talbot and the relevant statutory protections and local designations in place that safeguard and conserve the County Borough's historic assets.

6. KEY PLANNING CONSIDERATIONS

6.1 This Section now sets out the key planning considerations arising from the proposal and draws the site's context, planning policy review and any other material considerations.

6.2 The key planning and technical issues pertinent to the consideration of this application are as follows:

- Principle of Development;
- Planning Policy Compliance, with regard to:
 - Economic Benefits;
 - Impact on Local Area and Amenity;
 - Impact on Flood Risk and Drainage;
 - Impact on Surface Water, Groundwater and Water Supplies;
 - Landscape Impact;
 - Ecology and Wildlife Impact;
 - Highways and Transport Impact;
 - Impact on Noise Pollution and Air Quality;
 - Local Heritage Impact;
 - Impact on Health and Society;
 - Heritage Impact;
 - Geological and Geomorphological Impact; and
 - Visual Impact and Design;

Principle of development

6.3 The principle of employment and industrial development at the Site is established primarily through its designation as a strategic employment site under Policy EC1 'Employment Allocations' as allocation reference 'EC1/2+ - Junction 38 (M4), Margam'. To this end site, comprising 6ha in size, is allocated for use classes B1, B2 and B8.

6.4 As stated within Policy EC3 of the LDP, *'the proposal should demonstrate that it can be sustainably justified in this location and is appropriate in scale and form to the role and function of the employment area'*.

6.5 With specific reference to the Site and its strategic allocation for employment use at Junction 38 (M4), a key consideration for the planning application is employment growth (Policy SP11) to promote a sustainable economy. The proposed development complies with Strategic LDP Policies SP5 and SP11, where the existing employment use of the Neath facility (EC2/5) seeks to expand their services within land allocated for strategic employment purposes that falls within the Coast Corridor Strategy Area (EC1/2+). By doing so, the development will safeguard the existing employment use within the county borough and provide opportunity for employment expansion, aligning with the intent of paragraph 5.2.1 of SP11: *'Existing employment uses will be supported and safeguarded and new and expanding employment developments will be encouraged...'*. Furthermore, SP11 details that expanding employment developments will be encouraged and supported to meet economic development and employment needs of Neath Port Talbot.

- 6.6 The identified site falls within the periphery of the established industrial employment estate of the wider Tata Steel Works and forms a strategic cluster of industrial developments along the recently completed PDR network. Employment allocation EC1/2+ for Junction 38 (M4), Margam details the permitted use classes for development as B1, B2 and B8.
- 6.7 The Site is adjacent to existing Margam Green Energy Plant, Western Wood Energy Plant, BOC Gas and Gear store and the wider Tata Steel development, meaning the Site's context is already characterised by more recent and long-established industrial development, to which the proposal would form an appropriate extension.
- 6.8 Paragraphs 5.2.13 – 5.2.16 of LDP policy SP11 directly address the proposed employment site and its potential for industrial operations. These paragraphs identify the site's '*excellent road transport links*' with the adjacent Harbour Way PDR, A48 and M4 in close proximity. Policy SP11 also notes '*the site is near to a number of existing employment and industrial operations.*'
- 6.9 The proposed development would be comprised of B1, B2 and B8 uses, aligning with LDP Policy EC1 and EC3. Policy EC3 restricts development within allocated employment areas to ancillary facilities and services which support and complement the wider role and function of the primary employment use.

'Within allocated and 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.'* (5.2.20 EC3, LDP 2016)

- 6.10 Paragraph 5.2.22 addresses ancillary services appropriate within heavy industrial sites, as such the proposed development would seek to support and substantially enhance the overall industrial function of the existing employment area at an appropriate scale and form. The development would do so whilst providing business to the neighbouring gas and green energy plant.
- 6.11 The acceptability of this form of development in principle is therefore strongly evident in the Site's LDP designation and location adjacent to the existing industrial centre of Port Talbot.

Planning Policy Compliance

- 6.12 The key LDP policies relevant for this type of planning application have been referenced above in section 5. The following assessment will provide greater details alongside the submitted technical report for this application.

Economic Growth

Economic Growth Strategy for South West Wales (2013-2030).

- 6.13 Notably, the development seeks to retain the business of Sandvik Osprey within Neath Port Talbot that would otherwise be lost due to on-going constraints at the existing Neath site.

- 6.14 In terms of existing employment areas, Policy EC2 identifies the current Neath site within the Milland Road Industrial Estate, Neath that is located in an area of flood risk as identified in TAN15. Paragraph 5.2.18 states existing employment areas will be protected with future development restricted to employment uses as per Policy EC3. The proposal would support this where the existing Neath site undergo a phased closure prior to relocation, through which the site is proposed to be sold on for redevelopment for employment use in line with EC4.
- 6.15 This relocation therefore triggers Policy EC4, through which this application and supporting documents demonstrate that the current employment site at Neath is no longer viable or appropriate in this location to meet the demands of Sandvik Osprey.
- 6.16 In compliance with Policy EC4, Sandvik Osprey have demonstrated that the current site in Neath is no longer viable in order to keep up with the unprecedented demand for their services. The following 13 challenges are identified across the existing operations at the Milland Road Industrial Estate and can be grouped into five key themes: safety, environmental, productivity, quality, and expansion. The identified challenges are as follows:
- *General site congestion (safety)*
 - *Restricted site entrance (safety)*
 - *Vehicle/personnel segregation (safety)*
 - *Localised anti-social behaviour (safety)*
 - *HGV loading (safety and productivity)*
 - *Controlled asbestos (safety and environmental)*
 - *Aged buildings (environmental)*
 - *Outdoor logistics (quality and environmental)*
 - *Poor product flow (productivity)*
 - *Fully utilised space (expansion)*
 - *Limited electrical supply (expansion)*
 - *Limited inert gas capacity (expansion)*
- 6.17 Therefore, the proposed development would enable Sandvik Osprey to address and overcome the above challenges, whilst simultaneously enabling them to extend their services through creation of space and dedicated facilities to market high purity variants (such as cooper powder) and expand production of Metal Injection Moulding (MIM) and Additive Manufacturing (AM – also known as 3D printing).
- 6.18 The new location and proposed development would enable greener operation of the metal processing facilities and ensure the retention of Sandvik Osprey within Wales and the UK.

Design, Access, and Layout

- 6.19 Paragraph 5.5.8 of LDP policy BE1 stipulates that '*All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.*' Policy BE1 then continues to set out the criteria proposals must satisfy to be permitted and is addressed below.

Character and Appearance

- 6.20 In terms of character and appearance of the site, the development will substantially change the existing Greenfield character of the site, however it will contribute positively to the existing industrial character of the adjacent estate and the wider Margam area. The proposed siting and scale of the development would be appropriate, whereby it would form the fourth industrial addition to the surrounding industrial estate made up of the Margam Green Energy Plant, Western Wood Energy Plant and BOC Gas & Gear and therefore sit within an established local industrial landscape. The proposed height and massing of each component would be appropriate to their context with the maximum height of the development being the main building at circa 16.5m that would sit below the neighbouring Margam Green Energy Plant. Together this will provide a development that is within scale of the proposed floor space.
- 6.21 Section 5.12 of TAN 12 Design details the importance of design in employment and commercial areas where *'Efforts should be made to present a positive, outward looking image by ensuring key buildings within the development front on to roads and help improve connectivity'*. The proposed design would support this through the location of the office block providing clear street frontage to the main access routes to the north.
- 6.22 As per 5.5.12 of BE1 the new development takes full account of the visual impact it may create and is carefully assessed in the submitted LVIA produced by Soltys Brewster Consulting Ltd. Ltd. It is considered that the proposal would not create additional harm to the 'Arterial Gateway' of Neath Port Talbot than what already exists due to previous development in the area.

Layout and Masterplan

- 6.23 The masterplan would deliver a legible development that responds to surrounding industrial uses, reflecting, and complimenting the densities and patterns of development within the vicinity of the site. The proposal would achieve an appropriate mix of uses and densities across the site to support the administrative and industrial demands of Sandik Osprey. The proposal would clearly define boundaries and establish building lines that form a strong relationship between public and private spaces, whilst utilising design to create easily recognisable features and landmarks in line with TAN12. The development's design strengthens this relationship through an improved layout and street frontage at the northern entrances of the site.
- 6.24 The layout design would ensure safe movement across the site and safe access in and out of the site for all modes of travel. As detailed in the transport assessment, the design would align with policy BE1 and not have *'a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community'*. A series of landscaped footpaths and highways will connect each element of the masterplan together and link the development with the surrounding community enhancing the existing integrated transport network in accordance with criterion 7 of policy BE1. This continuous footpath network would support the site's legibility through a coherent walkable masterplan and provide an ease of movement to, from and within the site in line with paragraph 7.0.10 of the Design SPG.
- 6.25 The proposal's layout would ensure the services area are conveniently located on the western perimeter of the site within an accessible compound that is partly screened from public areas, as per section 7.0.3 of the Design SPG (2017).

Green Infrastructure

- 6.26 The submitted Green Infrastructure Plan illustrates the proposed landscape design that incorporates existing patterns of vegetation, planting, and green corridors throughout the site. The plan identifies the landscape features that are to be protected or enhanced through appropriate landscape treatment and sets out the layout, scale, and form of the design to ensure habitat connectivity.
- 6.27 Overall, the dedicated green spaces create an attractive environment that provides space for biodiversity and therefore enhance the development's ability to adapt to changes in local environmental conditions over time as a result of climate change.

Community Safety and Crime Prevention

- 6.28 The design solutions used within the scheme reflect that of community safety and crime prevention to design out crime, creating a safe and secure place through good design. Initiatives such as natural surveillance and a sense of ownership and responsibility have been integrated across the site through the strategic location of highly populated buildings overlooking key access routes, security gates and fencing in addition to adequate street lighting and CCTV. A 2.8m high paladin fence would be erected around the perimeter of the security barrier, gate, and boundary line with 2.4m high palisade fencing around relevant electrical transformers. A gate house is proposed at the north-western access road entrance adjacent to the security gate for HGV traffic. By doing so the development seeks to *'reduce opportunities for crime, disorder and anti-social behaviour'* as stipulated in TAN12 Design.

Construction Materials

- 6.29 Careful consideration has been given to the proposed materials across the development proposal to ensure the design responds sensitively to its context. Each building's external treatment has been designed to provide longevity of their use and a positive visual impact through an effective use of glazing, cladding and facades. This in turn helps to reduce their dominance within the immediate and wider context whilst ensuring the specialist needs of the occupier are met.

Signage

- 6.30 Signage and branding placed on the relevant buildings would be appropriate to the scale of development and the local industrial context. 'Sandvik' blue branding is proposed on the north and south elevations of the main building and would be non-illuminated and not project from building face. This branding is also proposed for the north and eastern elevations of the office block that both benefit from road frontage in the northern field.

Main Building Design

- 6.31 The main building would be located on the southern boundary of the site, furthest from the main entrance and street scene and provide a significant set back from the adjacent Tyn Y Caeau. Smaller scale development such as the amenity building and car park will be located between the two and ensure the massing and scale of the building would not dominate the site. The main building's L-shaped design would provide visual interest through a coloured gradient facade treatment that would lessen the dominance of the building. It is also noted that the main building would stand approximately 16m tall.

Office Block Design

- 6.32 The part two-storey, part single storey office block has a clear primary and secondary block configuration with the principal elevation facing the existing shared access road to the north. The entrances and reception area would also front on to the proposed forecourt facing the shared access route and enhance the surrounding street scene. The proposed planting scheme and landscaping would also ensure the building blends in with the surrounding context.

Amenity Building Design

- 6.33 The amenity building would have a two-storey asymmetric roof element that steps down to a single storey canteen extension with a pitched roof and strong glazed element on the northern elevation. The main entrance on the eastern elevation would have an entrance canopy to provide shelter to those entering and exiting the building.

The Services and Substation Building Design

- 6.34 The services and substation buildings have been designed to ensure an ease of access for maintenance and service vehicles as demonstrated by their co-location along the perimeter of the site nearby to the operational entrance. Their appearance and proposed materials would complement that of the main building and contribute towards a coherent development scheme. The proposed building scales would also be fit for their purpose and contribute towards their subservient appearance that is not visually intrusive.

Impact on the Character and Appearance of the Area

- 6.35 As per LDP Policy SP21 Built Environment and Historic Heritage, the development proposal would respect the distinctiveness of the site and where appropriate conserve and enhance the surrounding built environment and heritage through sensitive design, appropriate scale, form, and materials. Overall, the development is not considered to harm the immediate setting due to the existing industrial context of the site and wider area. However, where appropriate landscaping and planting has been introduced to strengthen the existing boundary treatment to the east to soften the development's impact on the historic development to the east beyond the M4.

Highways and Transport

- 6.36 Policy TR2 of the LDP states: *'Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:*

1. The development does not compromise the safe, effective, and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;

2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;

3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;

4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.'

6.37 Additionally, Policy SP20 'Transport Network' provides a number of measures in which the transport system and infrastructure will be developed, which include: '*7. requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport*' and '*8. Requiring appropriate parking provision.*'

6.38 Apex Transport Planning were instructed on behalf of Sandvik Osprey to undertake a Transport Assessment and Travel Plan to determine the sustainable connectivity and transport impact of the development proposal. The report concluded that the proposals are appropriately located for access by sustainable modes, considering this is an allocated employment site, in an existing employment area, where movements have been accommodated safely. The report also details proposed parking and access arrangements in line with the finalised masterplan.

Access

6.39 As detailed earlier in Section 3 of this Statement, the development site is accessed from an unadopted road which links to the A48/A4241 roundabout and located within close proximity of the strategic road network, assisting in minimising the impact of the proposal on the local road network. The main access routes would form an extension of an existing spur on the northern boundary with secondary access for operational traffic located on the north-western boundary. Both of which provide appropriate geometry and visibility splays to be considered safe and suitable to accommodate the development proposal.

6.40 Moreover, the proposal can appropriately accommodate service and delivery vehicles that can enter and exit the site in forward gear. The north-western access road would also benefit from a right-turn only when exiting the site. Vehicles are able to reverse against the proposed service bays throughout the site and turn in the areas provided without conflict. Together this ensures the implementation of safe and efficient transport infrastructure on site in support of LDP Policy SP20 Transport Network.

6.41 Security gates or drop-down barriers will be located at all entrances into the site to provide secure access for all vehicles in and out of the site. 4m wide double access gate will separate operational and domestic traffic access to the south of the main car park.

Active Travel

- 6.42 In terms of pedestrian and cycle access, the site is well connected to existing walking and cycling routes and active travel network along the shared footway/cycleway of the A48 which connects the site to the surrounding Margam and Port Talbot residential areas. The site benefits from the adjacent good quality National Cycle Network Route 4 that links to the site access road and services London to Fishguard, therefore demonstrating the site's suitability to support and enhance Neath Port Talbot's walking and cycling network (SP20).

Parking

- 6.43 As detailed within the accompanying Transport Assessment, total of 170 car parking spaces will be provided that would accord with the guidance set out for Zone 4 locations in the Parking Standards SPG (2016) and provide 11 disabled parking bay in excess of the guidance (6%). To align with PPW11 (Planning Policy Wales 11) and NPTCBC's electric vehicle aspirations, the scheme would accommodate 10% of the parking space for electric vehicle charging (18 spaces). Due to the forecasted HGV movements on site, there would not be a significant demand for operational parking for large vehicles. However, a dedicated area for operational parking is provided on the east and west sides of the main building.

Car Park	Number of Spaces
Southern car park (Amenity)	10
Main car park	98 (6 disabled, 10 electric vehicle charging)
Secondary car park (Office)	55 (4 disabled, 6 electric vehicle charging)
Northern car park (Office)	7 (1 disabled, 2 electric vehicle charging)
Total:	170 (11 disabled, 18 electric vehicle charging)

Cycle Parking

- 6.44 As stipulated in the Parking SPG, industrial development should provide 1 space per 500m² for long stay parking and 1 space per 1000m² for short stay parking. When applying this to the development proposal it would equate to a requirement of 56 long stay space and 28 short stay spaces (84 spaces total).
- 6.45 The site will provide secure and covered cycle shelters which can accommodate 56 cycles in two locations within close proximity of the amenity block. A further 28 cycle stands are provided for visitor use. Each shelter will be located close to building entrances for the amenity and office block.
- 6.46 The development would deliver above the required level of cycle parking provision stipulated in the SPG. The cycle parking will be monitored as part of the travel plan and, if demand dictates, additional provision will be considered.
- 6.47 To this end, it has been demonstrated that the above criteria of Policy TR2 has been met and the proposed development will have no adverse effect on the existing highway network.

Archaeology and Heritage

- 6.48 Forming part of this application, Cotswold Archaeology have completed a Historic Environment Desk-based Assessment for the proposed development in line with Policy SP21 to identify, where appropriate, the historic heritage will be conserved and enhanced. Policy SP21 'Built Environment and Historic Heritage' states:

'The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:

- 1. Encouraging high quality design standards in all development proposals;*
- 2. Protecting arterial gateways from intrusive and inappropriate development;*
- 3. Safeguarding features of historic and cultural importance;*
- 4. The identification of the following designated sites to enable their protection and where appropriate enhancement: (a) Landscapes of Historic Interest; (b) Historic Parks and Gardens; (c) Conservation Areas; (d) Scheduled Ancient Monuments; and (e) Listed Buildings and their curtilage.'*

- 6.49 Where the site does not contain any listed buildings or scheduled ancient monuments, nor fall within a landscape of historic interest, historic parks and gardens, or conservation areas, the development would in principle comply with SP21. Nevertheless, consideration has been given to the site's diverse and distinctive historical surroundings.
- 6.50 Cotswold Archaeology's assessment concluded that the development of land within the site would lead to no harm to significance of designated heritage assets located within the environs of the site through alteration of their setting. Demonstrating that the development would ensure the safeguarding and protection of Margam Historic Park and Gardens, Grade I listed Margam Castle and associated designated heritage assets.
- 6.51 An effect of less 'very small' harm to the overall significance of the non-designated Tyn y Caeau Farmhouse. The late-18th Century Farmhouse is currently dis-used and abandoned and separated from the ownership of the adjacent land. The construction of the M4 Motorway to the east and industrial developments to the west have resulted in a loss of 'rural' character, further diminishing the significance of the Farmhouse, and creating an urban environment. However, on balance the impact of the development would not be contrary to LDP Policy 21 or PPW Edition 11, where cases that involve less significant archaeological remains must weigh the relative importance of the remains and their settings against additional factors, such as the need for the proposed development.
- 6.52 The site does not feature within any main designated views from Margam Park and is largely screened elsewhere due to mature tree and hedgerow coverage. However, although the site may fall within a 'gateway' into the county along the M4 corridor, the development would sit appropriately within its immediate industrial context in conjunction with the existing power plants and not result in the degradation of the image for the area.

- 6.53 Cotswold Archaeology's assessment identified structures that are ruinous in nature that likely comprised storage barns or outhouses associated with the adjacent Tyn y Caeau Farmhouse. The late-19th century structure show what is likely the eastern edge of the walled property line that forms the northern edge of the woodland. Due to the structure's evidential and historical value as a non-designated historic asset, the surviving eastern wall is to be retained and will not be adversely impacted upon. This area can be seen to be retained within the accompanying Masterplan drawing.

Ecology

- 6.54 Soltys Brewster Consulting Limited have undertaken a Phase 1 Habitat Survey of the site which is included within the accompanying Ecology Note. This assessment concluded that the site holds no designation for nature conservation, although it should be noted the site is located 500m from the Eglwys Nunydd Reservoir Site of Special Scientific Interest (SSSI), which is also a locally designated Site of Importance for Nature Conservation (SINC).
- 6.55 Although the assessment returned records of a Badger within 1km of the proposed site, no evidence was found during the survey to suggest the current use of the site by a Badger. It was recommended that protective measures during the construction phase of any future development could be used, such as protective fencing and the covering of excavations overnight.
- 6.56 The assessment also identified a number of trees which may have the potential to support roosting bats (Target note 5 and 7) of the report and so further surveys have been recommended if these were to be removed. As per the accompanying masterplan, both trees are proposed to be retained for the development and so further surveys should not be required.
- 6.57 Furthermore, it was found that the presence of Great Crested Newts or Dormice would be unlikely at the site. It was also stated that the proposed layout indicated that the areas of the site considered most suitable to support reptiles are likely to be impacted by the scheme layout and so no further survey work would be required.
- 6.58 The site was noted to support priority habitats listed under Section 7 of the Environment Act (Wales) 2016 and identified potential impacts from the development such as the loss, fragmentation, and disturbance of these habitats, where sections of the marshy grassland, woodland and hedgerow would be lost as part of the development design. However, the retention of these features (as far as practicable) and on-site compensation measures, such as habitat creation and detailed habitat management strategy, would help avoid the impacts of the development.

Arboriculture

- 6.59 Arboricultural Technician Services Ltd (arbTS) have produced an assessment of the quality of the trees, impact of the proposed development, and details of the protection measures for retained trees during construction work. A Arboricultural Impact Assessment (AIA), Tree Constraints Plan (TCP), Tree Protection Plan and Arboricultural Method Statement have been produced to support the submitted Arboricultural Report.

- 6.60 In total 37 trees and 23 tree groups were surveyed, providing a total of 60 surveys 2 of which were classed of high-quality category A, 27 classed as moderate category B, 30 deemed of low-quality class C and optional for retention and one of poor-quality category U that are unsuitable for retention.
- 6.61 The submitted AIA details the proposed tree loss to facilitate the construction of the proposed development. 14 individual trees and 5 small tree groups are proposed to be removed totalling 30 trees overall. 20 of these individual trees are of low-quality category C and do not present a constraint on the site. 10 category B tree are to be removed and can be readily mitigated on site by a comprehensive tree planting scheme.
- 6.62 The loss of trees is not considered to impact the local amenity of the area where mitigate tree, hedgerow and shrub planting will provide a combination of different diverse tree/shrub species and varied nursery aged stock.
- 6.63 Tree surgery is also proposed to prune back lateral branches of Hedgerow G3 and G4 by 2 metres in branch length to suitable pruning points.
- 6.64 Potential damage to the Root Protection Area from the removal can be managed through the installation of tree protective fencing, construction exclusion zones, permanent ground protection, aboricultural watch brief and the installation of a no dig cellular confinement system for footpath construction. During the landscaping phase, an airspade will be used to remove soil to accommodate the installation of drainage pipes that will be threaded through the retained tree roots and back filled with extracted soil. These methods shall ensure no significant long term adverse impact will occur to any of the retained trees' root system or associated soil structure.
- 6.65 A high proportion of the higher value trees (A + B Category) have been retained. The proposed Tree Protection Plan would facilitate the construction of the development and ensure the protection of the retained trees during all stages of construction.
- 6.66 Adhering to the detailed aboricultural report will ensure the development can be constructed without any significant long-term adverse impact onto the retained trees or the amenity of the area.

Green Infrastructure

- 6.67 A Green Infrastructure Plan has been produced by Soltys Brewster, which sets out the proposed Green Infrastructure strategy for the site. The intent of Policy EN7 of the LDP seeks to take into account ecological or visually important natural features and permit development where *'full account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible'*. The submitted Green Infrastructure Plan has considered the biodiversity value and role of the relevant features on site where removal is unavoidable, and incorporated mitigation measures in line with Policy EN7.
- 6.68 Where possible, the overall scheme retains and enhances the existing green infrastructure corridor that stretches across the site and previously separated the northern and southern fields and joins up with the eastern boundary shared with Tyn Y Caeau. The proposed planting scheme would strengthen this corridor with native hedge mix to gap up existing hedgerow and plant trees at key corridor intersections, as shown in the amenity open space to the north of the canteen.

- 6.69 Owing to the secondary access road to the northwest of the site boundary the G2 hawthorn hedgerow is proposed to be partially removed, however this will be mitigated through on-site compensation such as additional planting, habitat creation and a detailed habitat management strategy to enhance the existing green corridor. Furthermore, the completed ecology note, identifies this hedgerow as heavily grazed and ‘gappy.’ To this end, the GI corridors of the site will be retained and enhanced where possible.
- 6.70 Additional native hedge mix is proposed along the staff access road into the site, the northern boundary of the main building car park shared with Tyn Y Caeau, and the southern boundary of the site along Longlands Lane to gap up the existing hedgerow. Where appropriate coppice management will be implemented along the green infrastructure corridor.
- 6.71 Existing marshy grassland and semi-improved neutral grassland to the north of the site is to be retained and managed with existing Japanese knotweed stands to be treated along the boundary of Tyn Y Caeau. The northern road access will be sufficiently treated with considerable tree planting along the shared road frontage with a more spaced-out configuration at the site entrance and northern car park.
- 6.72 To enable the road and car park construction across the site a collection of trees are to be removed in the northern field, and to the south of Tyn Y Caeau as shown on the green infrastructure and strategic landscape plan. All trees that are to be removed have been individually assessed and fall within Category C or B. Amendments to the site layout have ensured the retention of a significant cluster of trees located on the southern boundary with Tyn Y Caeau where a category A Beech tree is located.
- 6.73 It is proposed that the eastern boundary will be strengthened with a native woodland mix and semi-mature trees to create buffer from the immediate A48 and Margam Interchange, and adjacent M4. To the west of this a wet grassland mix is proposed on land adjacent to the amenity block. Landscaping will especially be focused on the proposed open amenity space to the north of the amenity block and canteen. Paragraph 5.1.57 of LDP Policy OS1 requires open space provision for employment developments *‘to access outdoor amenity space close to the workplace in the interests of health and well-being’*. This requirement will be satisfied through a high-quality landscaping and planting scheme that will provide attractive areas to sit and rest for the enjoyment of site’s employees.
- 6.74 Thus, it is considered that where possible landscape features and trees have been retained and protected in line with LDP Policy EN7.

Landscape and Visual Impact

- 6.75 Policy EN 2 ‘Special Landscape Areas’ of the LDP advises that *‘development within the designated Special Landscape Areas will only be permitted where it is demonstrated that there will be no significant adverse impacts on the features and characteristics for which the Special Landscape Area has been designated’*.
- 6.76 The Landscape and Visual Impacts of the proposed development have been assessed by Soltys Brewster, which included four viewpoints of the site. The site is not located within a Special Landscape Area, although Landscape Character Area 1 – Margam Marsh (reference EN2/4) lies to the east of the site, which is separated by the M4 motorway.

- 6.77 It was found that some short-term visual effects will be experienced during the construction phase of the development, particularly for residents adjacent to the southern boundary on Heolcaer Bont and users of the Wales Coast Path, however, it was found that there will be no significant landscape effects during the operational stages of the development, with some significant visual effects.

Ground Conditions, Contamination and Pollution

- 6.78 Policy EN8 '*Pollution and Land Stability*' of the LDP, states '*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 due to the following will not be permitted:*

- *Air pollution;*
- *Noise pollution;*
- *Light pollution;*
- *Contamination;*
- *Land instability;*
- *Water (including groundwater) pollution.*

- 6.79 Proposals which would create new problems or exacerbate existing problems detailed above will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level.'

- 6.80 A Phase 1 Geotechnical Desk Study was performed by Terra Firma to assess the ground condition of the site and provide a preliminary human health and environmental risk assessment

Coal Mining Risk Assessment

- 6.81 Accordingly, a Coal Mining Risk Assessment has been completed that identified there are no known mine entries within 20m of the site. The assessment concluded that it would not have been technically viable to undertake small scale unrecorded coal extraction beneath the site on account of the depth to bedrock and the need to dewater any excavations. The overall risk to the surface stability of the site from possible unrecorded workings is considered negligible.
- 6.82 The known workings are not expected to pose significant risk of mine gas as gassing potential diminished with age after working and, given the seams depths, they will be flooded and lie at a significant depth leading to hydrostatic pressure which also retard gas emissions from coal.

Pollution and Human Health and Environmental Risk Assessment

- 6.83 An Envirocheck Report indicates no record of any landfill sites within 250m of the site.
- 6.84 A category 3 minor pollution incident to controlled water is recorded within 250m radius of the site and relates to a discharge of raw sewage from Afan Pumping Station in 1995.

- 6.85 A preliminary human health and environmental risk assessment has assessed the potential or known sources of contamination associated with the sites current and historical land use and their potential pollution pathways. All identified sources of pollution to human health and the aquatic environment were considered low risk with probabilities of low likelihood – unlikely determined and therefore acceptable under Policy EN8. Additional intrusive ground investigation would enable the assessment of the chemical and geotechnical properties of the site alongside the installation of monitoring wells to assess the groundwater level and allow gas monitoring to determine the Gas Characteristic Situation of the site.

Ground Quality

- 6.86 The above demonstrates that the ground quality of the development will be protected and no significant adverse effects on the ground quality will arise or significantly increase pollution levels in accordance with SP16 and EN8 of the LDP. The supporting assessments and desk studies have accounted for the past activities of the surrounding area and determined the ground contamination and stability would be suitable for development. The proposal would comply with Policy EN8 where the development would not exacerbate existing land contamination, pollution or instability and ensure no adverse effects will be caused at any stage of development within or outside the site.

Flood Risk

- 6.87 JBA Consulting completed a Flood Consequence Assessment (FCA) for the proposal and identified that the majority of the development site is located in Zone A of the Development Advice Map Classification. The site is therefore considered to be at little or no risk of fluvial or tidal flooding with only a small catchment of the proposed development to fall within Zone B (past evidence of flooding from sedimentary deposits) and Zone C2 (floodplain without significant flood defences). As per paragraph 11.1 of TAN15, where a site falls partially within zone C, the planning authority must judge whether to apply a justification test and the acceptability of flood consequences. In this instance, a small part of the access road is located in the very limited areas of Zone C2. Furthermore, the site is an allocated strategic employment site. The supporting FCA has assumed that a Justification Test would not apply to this development, however the acceptability criteria have been carefully considered through the assessment.
- 6.88 Policy SP1 of the LDP states, '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 flooding elsewhere.'
- 6.89 Natural Resources Wales' (NRW) Flood Risk Assessment Wales (FRAW) Map indicates that the majority of the site is located within a very low risk area for flooring from rivers. A small part of the northern boundary has a high and medium risk of fluvial flooding with two small areas along the north-western corner and access road having a low risk of fluvial flooding.
- 6.90 The NRW FRAW flood risk sea map indicates the site is not at risk of tidal flooding. A detailed assessment of tidal flood risk shows that the proposed development site and its access roads are predicted to be flood free during the 2021 0.5% AEP and 0.1% AEP flood events.
- 6.91 The NRW FRAW surface water and small watercourses map shows that the majority of the site is at very low risk of flooding, however a small, localised area in the south has a high chance of flooding due to a dip in topographic levels that result in surface water ponding. To address this, the proposal seeks to re-level this area within the site design to ensure surface water ponding does not occur. The proposed drainage strategy would also demonstrate the development will not increase the risk of surface water flooding.
- 6.92 The Council's Flood Risk Management Plans indicate no historical groundwater or sewer flooding and therefore conclude the risk of groundwater flooding and sewer flooding at the site is very low. The NRW flood maps indicate the site is not at risk of flooding due to reservoir failure.

- 6.93 Following the recently published Flood Map for Planning (FMP) and updated TAN15, the new FMP indicates a greater extent of the site will fall within flood zone 3 and 2 for sea, rivers and surface water and small watercourses. However, no built development is proposed within the Rivers or Surface Water and Small Watercourses Flood Zones 2 or 3. A small part of the north-western access road is proposed within Flood Zones 2 and 3 of the FMP for the sea. Further detail is set out within the FCA supporting the proposed development.
- 6.94 The submitted FCA demonstrates the proposal's acceptability in terms of the TAN15 criteria and satisfies all the requirements in compliance with the development and flood risk aims of PPW and LDP Policy SP1.

Drainage

- 6.95 A Preliminary Drainage Strategy Report has been prepared by James and Nicholas.
- 6.96 Initial infiltration tests undertaken by Terra Firma (Wales) Ltd found the infiltration rates within the sand and gravel ground profile to vary between 1.12×10^{-4} m/s to 9.77×10^{-5} m/s, which therefore indicates the site has a very good soakaway potential.
- 6.97 The site is currently not served by a dedicated foul sewerage system, however a combined adopted sewer crosses the site, parallel to and within the eastern boundary. Moreover, as the site is currently Greenfield, it is not served by a piped surface water system. An existing drainage ditch cross the site from east-to-west and drains into a culvert located on the western boundary that runs beneath the existing access road and drains into the Margam Moors drainage system. A second culvert is located in the north-western corner and serves nearby highway drainage and similarly discharges to the Margam Moors via a balancing pond located outside of the site.
- 6.98 Due to the topography of the site, it is not possible to connect directly to the existing combined adopted sewer. Therefore, foul drainage is proposed to drain into a wet well and pumping station adjacent to the western boundary and pump the effluent from the tank via rising main prior to discharge via a connection to the combined adopted sewer.
- 6.99 The development proposed would have the following Total Flow Rates:

Proposed Building	Total Flow Rate (l/s)
Office Block	35.8
Amenity Block	20.9
Main Building	18.0
Total Wastewater Flow Rate:	7.4

- 6.100 It is therefore proposed that the pumping station will pump wastewater at a rate of 7.4l/s into the existing combined adopted sewer at the eastern boundary of the site.
- 6.101 DCWW (Dwr Cymru Welsh Water) are to be consulted to ensure the wastewater proposal can be accommodated within their existing system.

Sustainable Drainage Systems

6.102 With regards to Sustainable Drainage Systems (SuDS), an overall proposed surface water drainage layout is illustrated on drawings 20.62.C09 provided. The proposed drainage scheme would limit surface water run-off and flood risk whilst prevent pollution to align with LDP Policy BE1. The development proposal would ensure the drainage system would have '*no detrimental effects on the water environment or on flood risk*' as stated in paragraph 5.5.13 and would utilise various SuDS technique to do so.

6.103 Water quality of the site would also be managed through the construction of SuDS, as detailed in the Drainage Strategy Report. By implementing this strategy, the proposal seeks to '*minimise any adverse effects on water quality*' and reduced the development's '*potential to cause pollution*' through drainage in compliance with LDP Policy RN8 Pollution and Land Stability (paragraph 5.3.50).

6.104 Given the large scale of the proposal, six sub-catchment areas are proposed with appropriate surface water drainage strategies:

Catchment Area	Location	Proposed SuDS
1	Office Block and North Car Park	Served by an attenuation pond
2	Office Block and South Car Park	Served by a cellular soakaway
3	Main Car Park	Served by an infiltration basin
4	Main Building (West)	Served by an attenuation tank
5	Main Building (East)	Served by a cellular soakaway
6	HGV Access Road	Served by an infiltration strip

6.105 Catchment area 1 is to be served by a lined attenuation pond measuring a base area of 261m² and 1m deep. It is proposed to have a permanent body of water at 500mm deep and have storage capacity up to a 100-year storm plus 40% to account for Climate Change. The attenuation pond would be connected to a spel class 1 full retention separator with an attenuation pond outlet set 500mm above base level and discharge rate restricted to 2.5l/s. This will then connect to culvert B which drains into an existing drainage ditch off site.

6.106 Catchment area 2 would feature a cellular soakaway underneath the car park south of the office block. It would measure 15m x 15m x 0.8m with a 213m³ store and 95% void ratio. The soakaway would drain 3670m³ of surface water runoff.

6.107 Catchment 3 would contain an infiltration basin measuring 500mm deep, cover an area of 450m² with a base area of 300m². 3 inlets would be present, and the basin would be grassed and planted to provide amenity space.

6.108 Catchment 4 would be serviced by a cellular attenuation tank measuring 25m x 25m x 2m with a storage of 1250m³ for a 1 in 100-year storm and account for +40% for Climate Change. Surface water discharge is to be restricted to 21.9l/s via a hydrobrake (Qbar 1 in 100). The connected pumping chamber is to discharge surface water back into culvert A. The tank will be connected to a spel class 1 full retention separator.

6.109 Catchment 5 would include a cellular soakaway with the measurements 25m x 25m x 1.2m and storage of 690m³. The soakaway is to drain 12,000m² of surface water runoff and be constructed with sand and gravel strata. It will be connected to a spel class 1 full retention separator.

6.110 Finally, catchment 6 serves the HGV access road that will enter the site from the north-western boundary of the site and provide access to and from the Production Unit and its associated service buildings. This access road is to be serviced by an infiltration strip that will run along the length of the western perimeter of the road. The strip will measure two metres in width and 700mm deep and designed to accommodate a 1 in 100 year +40% climate change storm based on a calculated infiltration rate of 0.450m/hour. The proposed strip will be planted with wet meadow grass to replace the existing wet meadow grass which will be removed to allow the access road into the site.

6.111 Road areas and car parks are to be served by beany block drainage throughout the site. The north-western access road is to benefit from a service filter strip, to allow infiltration and to be planted with wet meadow grass.

6.112 Additional drainage features are proposed within the hardstanding area of the service compound (3no. gullies) and surface water drainage is to run along the perimeter of the substation and main industrial building to pick up rainwater pipes from the roof. ACO drains are also proposed to run the full length of the kerbing and dock leveller of the main building with the service road to be drained via gullies.

6.113 Further information is provided within the accompanying Drainage Strategy Report and Drainage Masterplan.

Waste

6.114 According to Policy SP 19 Waste Management, 'provision should be made for the sustainable management of waste in all new developments.' Additionally, Policy W3 Waste Management in New Development states, *'proposals for new development will need to demonstrate that provision is made for the design, layout, storage and management of the waste generated by the development both during the construction phase and occupation. The following proposals will be required to produce Site Waste Management Plans:*

- *(a) Residential development for 50 or more dwellings;*
- *(b) Industrial or commercial development that would generate in excess of 1,000 tonnes of waste per annum;*
- *(c) Development that would generate hazardous waste.'*

6.115 A Site Waste Masterplan has been prepared by Tetra Tech which provides further information on the applicant's intentions in terms of the management of waste generated from the proposed site and construction works. The SWMP encourages the minimisation of construction waste as far as is practicable. However, where the generation of construction waste is unavoidable, waste will be managed sustainably and responsibly in accordance with waste legislation, the Waste Hierarchy and national and local waste policy.

Air Quality

- 6.116 Air quality is an identified key issue in NPT and informs objective OB16 to address air quality issues and Policy SP16 for Environmental Protection. Policy EN8 does not permit development that would have an *'an unacceptable adverse effect on healthy, biodiversity and/or local amenity or would expose people to unacceptable risk'* due to air pollution. Human health and ecological receptors have been assessed as part of the submitted Environmental Impact Assessment statement. This assessment concluded that during the construction works there is potential to create dust, however appropriate mitigation measures are proposed so that any residual effects will be 'not significant.' Once completed the development is not predicted to result in any significant effects in relation to air quality in terms of NO₂, PM₁₀, PM_{2.5}, chromium, nickel, copper, and lead. Therefore, the proposed development would not contribute to these unacceptable adverse effects and where new problems may arise, suitable mitigation measures are proposed to reduce this risk.
- 6.117 TAN18 Transport makes reference to local air quality and the need for Air Quality Action Plans to be prepared for any Air Quality Management Areas declared. To the north of the site lies the Margam AQMA that was established in 2001 and is recognised in paragraph 5.3.43 of LDP policy EN8. Policy EN9 also addresses the Margam AQMA and the potential risk in breaches of air quality objectives. A CEMP (Construction Environmental Management Plan) has been produced that details the measures in place to avoid this possibility through the management of dust and airborne pollutants. Dust control procedures will be implemented to avoid the emission of dust and other particulates as far as reasonably practicable to ensure there is no significant deterioration of the current air quality as a result of the works. Please refer to the CEMP for further detail.
- 6.118 Daily visual and aural dust emissions monitoring shall be carried out and qualitative observations recorded to detail any remedial action taken if required.
- 6.119 In sum, the proposed development would suitably address and mitigate any potential risks to air quality and satisfy the requirements of LDP policy EN8 and EN9.

Noise and Vibrations

- 6.120 Hunter Acoustics have completed a Noise Impact Assessment on behalf of Sandvik Osprey for the operational noise impact of the proposed development. As part of this Hunters Acoustics have investigated the long-term background noise, the proposed operations, the main external building fabric, noise map analysis and car park noise impact assessment. A 7-day environmental noise survey has been undertaken covering both weekday and weekend periods to assess the existing noise climate and sound sensitive receptors controlled by existing industrial site, and the nearby A48 and M4 road traffic.
- 6.121 Source plant noise measurements have also been taken at the existing facility in Neath and used as a basis for an acoustic model, calculating sound insulation performance requirements to meet agreed environmental noise limits and assess external ventilation.

- 6.122 Ambient $L_{Aeq,15min}$ sound levels measure a daytime value of 58dB and 56dB, and similar night-time values of 56dB. The background $L_{Aeq,15min}$ sound levels measure daytime values of 50dB and 51 dB, and night-time levels of 46dB and 48dB. Both sound levels are controlled by continuous industrial sources, with the BOC site as a dominant source and contributions from plants at Western Bio Energy throughout the day and night, keeping night-time noise levels elevated. Road traffic noise from the A48 and M4 are not indicated as significant. Daily time history charts across ambient and background sound levels indicate levels that are generally consistent during the day and night.
- 6.123 Sample measurements were taken for source sample noise monitoring of the existing operations including internal process, external plant, and yard activity. Please refer to the submitted Noise Impact Assessment for further detail and the sample measurement results.
- 6.124 A noise rating level 5dB below the pre-existing background L_{A90} sound climate, at the Sound Sensitive Receivers (SSR) is proposed in line with the requirements of Pol05 of BREEAM2018. This shall ensure that the operational noise impact is unlikely to have an adverse impact based on BS4142:2014+A1:2019 guidance and mean that absolute L_{Aeq} noise levels are not increased.
- 6.125 The following operational noise criteria is applied at the nearest residential SSRs based on measured background sound levels:

Period	Noise Rating Level, dB L_{ArTr} *	
	Longlands House Greenacres	Tyn y Caeau
Daytime (0700-2300hrs)	45	46
Night-time (2300-0700hrs)	41	43

The Main Building

- 6.126 The main noisy indoor processes measured at the existing Neath site (atomising and sizing) are to be located in the western section of the main building. Low noise activities are indicated in the middle section with Phase 2 located at the eastern end to allow for future expansion. Phase 2 is likely to contain sizing activities.
- 6.127 Full height concrete walls are proposed between the noisy atomising/sizing halls and the quieter warehouse/stores.

The External Plant

- 6.128 Service filters for the ventilation and dust extract plant are to be located along the western elevation with 9no.transformers, maximising screening, and distance losses to the nearest SSRs.
- 6.129 Additional transformers are located in the substation compound, on the southern boundary near the proposed office block.
- 6.130 Proposed cooling tower plant is to be confirmed, however quieter cooling towers are proposed compared to the existing fans measured at Neath.

HGV Movements

- 6.131 External operations including HGVs accessing/leaving the factory have been considered with 10no. HGVs per day between 08:00-18:00 expected, allowing a maximum of 2no HGVs in any one hour. 2no HGVs per week are advised between 18:00-08:00. All HGVs are to access the site from the north-western entrance, away from the identified sound sensitive receptors.
- 6.132 Although, initial noise model results indicate daytime factory and HGV noise levels to meet the criteria, a marginal excess is indicated at night for HGV movements. However, as night-time HGV movements would be limited to two visits per week and absolute levels are well below prevailing ambient noise night climate, the proposed occasional movements can be easily accommodated within the existing soundscape.

Car Park

- 6.133 Consideration has also been given to the staff car movements to/from the two car parks at shift change. The car parks are to be accessed from the north-western entrance, running past Tyn y Caeau.
- 6.134 The car park noise impact assessment has predicted office car park levels at SSR Tyn y Caeau to be 45 LAeq,1hr (dB) on arrival and 46 LAeq,1hr (dB) on leaving.
- 6.135 The car park noise impact assessment has predicted shop floor car park level at SSR Tyn y Caeau to be 44 LAeq,1hr (dB) on arrival and 46 LAeq,1hr (dB) on leaving.
- 6.136 A car park noise impact assessment determined the scale and severity of noise change to be insignificant at 10dB below the existing prevailing ambient noise of 56dBL_{Aeq,T}, and therefore 0dB change is indicated.
- 6.137 Possible mitigation for the overall noise impact may take the form of screening to remove line of sight from Tyn t Caeau first floor level to the car park access road and boundary of the shop floor car park.
- 6.138 The completed assessment also details a good practice guide for control of noise at source.
- 6.139 NPTCBC's Pollution SPG addresses noise at industrial developments, stating that in the case of industrial noise '*higher levels of background noise (e.g. traffic noise) render industrial sounds less noticeable.*' The development would support this guidance, where it is located directly adjacent to the A48 and PDR Harbour way, and less than 50m from the M4 where traffic noise is generally high. Furthermore, the site falls outside of the Welsh Government's Noise Action Planning Priority Area.
- 6.140 To this end, it is considered that the proposed development is in accordance with Policy EN 8 'Pollution and Land Stability'.

Agricultural Land Classification

Site and Climatic Conditions

- 6.141 Reading Agricultural Consultants conducted an assessment of land quality and identified the topography is level to gently sloping at between 10m and 15m above Ordnance Datum. The site's agro-climatic conditions are warm and very wet with moderately small to moderate moisture deficits. The number Field Capacity Days is very large and very unfavourable for providing opportunities for agricultural field work. There is an overriding climatic limitation to Grade 2.

Soil Surveys and Agricultural Land Classification

- 6.142 The soil surveys identified the topsoil as sandy clay loam with an average depth of 28cm and very dark greyish brown or dark brown colour (10YR3/2 or 10YR3/3). The volume of stone is low at between 2 and 8% and has a friable consistency and fine angular or sub angular blocky structure. In the north-eastern field, the surface layer of soil is notably more organic.
- 6.143 The upper subsoil comprises of the same instead with an increase stone content to 10-25% by volume. In the west, few mottles are present in the upper subsoil but in the east the mottles are common. The profile in the north-east is considered gleyed in the upper subsoil. The structure is weakly developed, but with fine subangular or angular blocky peds and friable consistency, the upper subsoil is permeable.
- 6.144 The stone content increases with depth, and additionally the subsoil was particularly dry at time of survey, resulting in an average total observation depth of 46cm, ranging from 22cm in the north-east to 80cm in the west. The lower subsoil in the west comprises medium to coarse sandy loam which is light olive brown (2.5Y5/3) and distinctly mottled. The lower subsoil is gleyed at depth and in a coarse subsoil texture, therefore the profiles are assessed as Wetness Class (WC) I.
- 6.145 The soil profile in the north-east is gleyed in the sandy clay loam upper subsoil and therefore assessed as WC III.
- 6.146 Together these profiles are all limited by wetness and workability to Subgrade 3a.
- 6.147 It is therefore determined that 4.7Ha (77%) of the site falls within Subgrade 3a, and the remaining 1.4Ha (23%) are graded subgrade 3b.

Energy

- 6.148 In accordance with policy SP18 Renewable and Low Carbon Energy, the development strives to meet national renewable energy targets and energy efficiency through achieving BREEAM accreditation in the future. Building design has carefully considered energy conservation and efficiency measures to reduce the overall need for electricity. Due to the convenient location of the adjacent Margam Green energy plant and Western Wood Energy Plant, the development would seek to connect to existing sources of renewable energy in line with LDP Policy RE2.

- 6.149 An Energy Assessment has been prepared by Melin Consultants, who are members of CIBSE Low Carbon Consultants. Melin Consultants have independently assessed and evaluated the Energy Efficient Design Measures, Site Constraints, the Baseline Energy Demand and CO2 emissions, and funding Availability when investigating the viability of integrating low and zero carbon (LZC) technologies.
- 6.150 Several technologies have been identified as suitable for inclusion within the development to further enhance the overall CO2 reduction. The most appropriate technologies being PV panels and Air Source Heat Pumps. The possibility of an electrical connection from the adjacent biomass energy plant was also deemed viable with the capability of supplying all the electricity for the proposed development from a low carbon electricity source and to remain 'off-grid.' If this were to be utilised, a back-up system would be required to ensure a supply is provided to meet the heat load of the development.
- 6.151 The roof sized of the development would be suitable to house a significant number of Solar Photovoltaic Panels that would provide a large reduction in energy costs and CO2 emissions.
- 6.152 An Air Source Heat Pump could be used to provide heat and hot water for the site, especially where there will be no gas connection on the site.
- 6.153 Subject to further studies, Biomass, CHP, Solar Thermal and Ground Source Heat Pump may be considered appropriate, however Hydro and Wind are not considered suitable.
- 6.154 The overall energy use for the three buildings totals 1,006,605.63kwh per annum. The use of energy generating technologies within the development would aid in reducing this energy load and the overall carbon emissions from the site. The process electricity load of the development, in particular the Production Unit, would likely mean all the energy generated on the site would be used on site and little exported to the grid.
- 6.155 The assessment determined that based on the heating loads of the buildings, a district heating system is potentially feasible. However, further consideration is required due to the varying requirements for heat and hot water due to the uses, heating loads and occupancies of each building affecting the plant sizing. All identified LZC technologies could be used for a site district heating scheme, subject to further consideration into their feasibility.
- 6.156 The development is not considered to have an unacceptable impact on the environment and amenity of local residents from the existing relationship that is present on site and the adjoining industrial context. The supporting Energy Assessment demonstrates the scheme's compliance with Local Policies SP18 and RE2.

Climate Change

- 6.157 NTPCBC set out how the LPA will address both the causes and consequences climate change through LDP policy SP1 Climate Change.

6.158 The development proposal strives to meet each of the criteria set out within this policy to minimise its' effects on climate change and recognises the fundamental importance of the policy to the LDP. In terms of causes of climate change, the development proposal would enhance the efficiency and sustainability of the County borough's settlements through the co-location of industrial development within a key strategic site that follows NPTCBC's sustainable development principles. Consequently, this will introduce more sustainable travel patterns through increased accessibility and enable a reduction in greenhouse gas emissions from operational transport as detailed in the submitted transport assessment. The site already benefits from a good level of sustainable travel which will be enhanced further through the proposed travel plan that will encourage sustainable travel behaviour. This in turn will help reduce the dependence on the private car through promoting alternative means of transport in line with policy SP1. Moreover, the development will seek to enhance efficiency and sustainability through the site's BREEAM outstanding ambitions in line with SP1 and the environmental considerations of PPW 11 in terms of location, design, build and operation.

6.159 In regard to the consequences of climate change listed in SP1, the proposal has taken into account and accords with recent national guidance TAN15: Development and Flood Risk, as detailed in the submitted FCA. The proposed drainage scheme would also enhance the development site's resilience from future risk of flooding by accounting for +40% capacity due to climate change and ensure there would be no increased risk of flooding elsewhere due to the development. Furthermore, the proposal would seek to minimise the fragmentation of habitats through the proposed green infrastructure plan that would, where possible, retain and enhance the existing green corridor and retain established tree coverage and strengthen existing native hedgerow.

Health and Safety

6.160 A preliminary human health and environmental risk assessment has been instructed and completed by Tetra Tech which concluded that there are no significant adverse effects to health as a result of the scheme. In addition, the proposed development will provide a number of jobs, which is a benefit to the area.

6.161 Strategic Policy SP2 Health provides measures to address the high levels of poor long-term health and sickness in NPT. The proposed development would seek to comply with these policy measures, where relevant, to ensure the development of sustainable, safe, and confident community. Careful consideration has been given to the environmental and safety impacts the development may have on the site and its surroundings and can be found in the submitted human health report. The scheme would provide an employment site that is highly accessible by the surrounding communities of Margam and Port Talbot and promote an active lifestyle through improved active travel routes. Most notably, the development proposal would provide new employment opportunities for the local area and therefore aid the reduction in unemployment and economic inactivity rates in accordance with SP2.

6.162 Sandvik have engaged with Health and Safety Executive (HSE) to ensure the development will be safe for operation. Consultation with HSE was triggered where the site is located within the inner, middle, and outer zones of the neighbouring BOC Gases development. The outcome determined that HSE 'Do not advise against' the development on safety grounds.

Community Safety and Security

- 6.163 The proposed development scheme has been designed with regard to public safety and the fear of crime as per paragraph 5.5.17 of LDP policy BE1. The development will utilise sufficient fencing and boundary treatment in conjunction with a self-contained security Gatehouse at the north-western access point and drop-down barriers to the northern access to ensure the safety of those on site and the surrounding area. Security gates will also be installed throughout the site to help aid crime and disorder prevention.
- 6.164 In addition, the installation of a comprehensive CCTV and lighting scheme will ensure surveillance across the whole site covering 23 cameras and help reduce the opportunities for crime, disorder, and anti-social behaviour. However, the proposed low level lighting scheme will balance the need to enhance safety and security with the policy objective of EN8 Pollution and Land stability to minimise the impact on light pollution.

7. CONCLUSION

- 7.1 Planning legislation requires that planning applications be determined in accordance with the Development Plan unless material consideration indicate otherwise.

“Full planning application of the development of a metal processing facility totalling 28,500sq.m of floorspace comprising a powder processing plant (17,377sq.m), warehouse and store (5,428 sq.m) office building (1,442 sq.m), amenity building (776 sq.m), laboratory (200 sq.m), services building (470 sq.m), substation (107 sq.m), phase 2 (2,700 sq.m), CCTV and parking on-site at J38, M4, Margam, Port Talbot.”

- 7.2 The proposal has been subject to extensive pre-application discussions which have informed the design of the development.

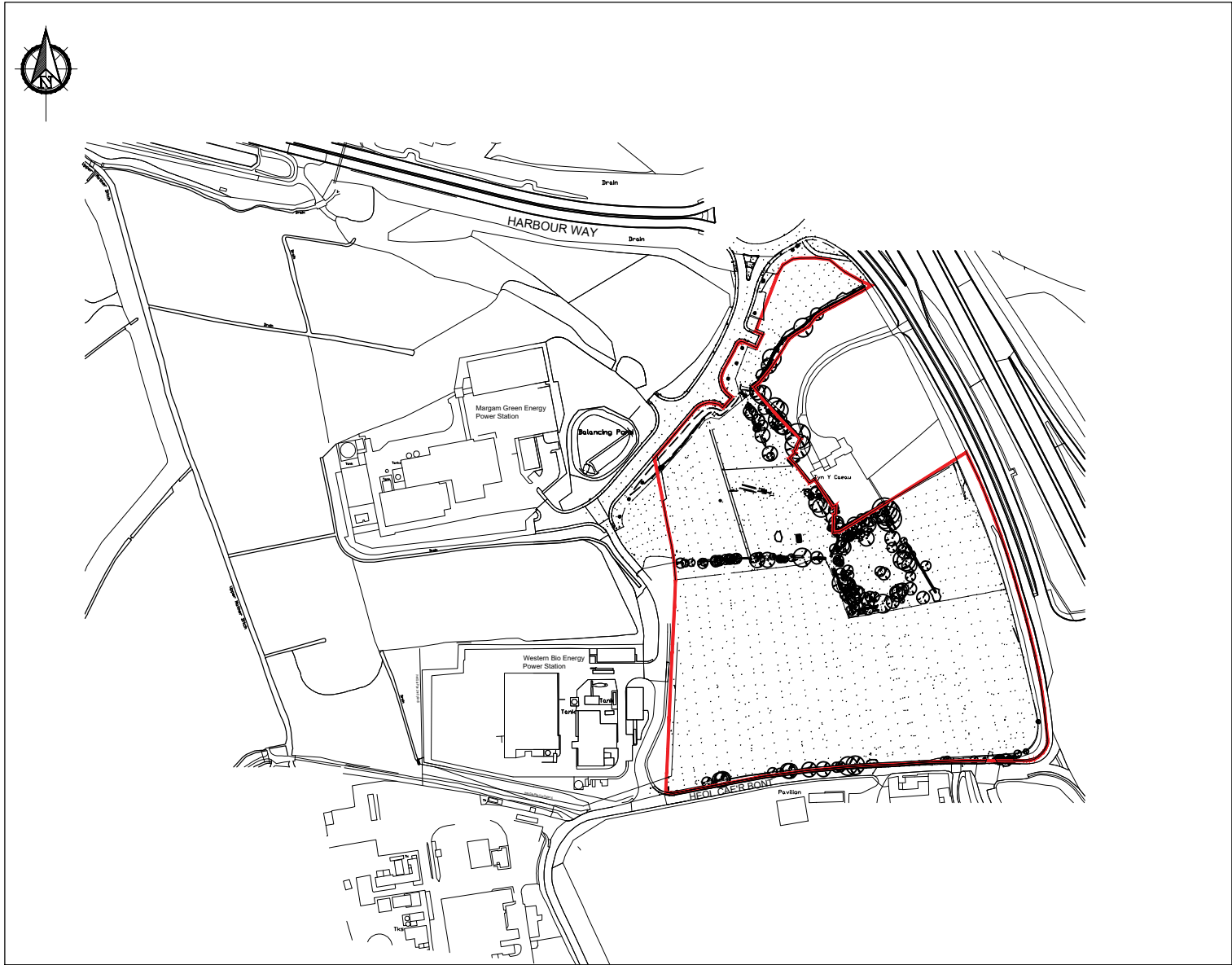
- 7.3 It has been demonstrated that the proposal will be delivered in accordance with relevant development plan policy and national planning guidance through making efficient use of an allocated strategic site for employment use, creating development that help meets the needs of the local economy and by providing high quality development that appropriately and sensitively reflects the site's industrial context.

- 7.4 In these terms, the proposal will:

- *Optimise the use of underutilised allocated for its dedicated employment use;*
- *Strengthen the existing industrial context of the site and coastal corridor;*
- *Provide potential for future expansion and promote economic growth through business specialisation;*
- *Be of a scale consistent with the surrounding context, in line with important principles established by local and national planning policies;*
- *Be accessible by all modes of transport;*
- *Make a significant contribution to the local economy in terms of job creation and investment;*
- *Help support a key local industry and provide much needed economic growth for the local economy; and*
- *Reflect the comments and representations of local residents, Members and the Council Planning Officers made during the pre-application process.*

- 7.5 In summary, the proposal is considered to be a positive scheme. It will deliver significant social, environmental, and economic benefits locally. These benefits are considered to outweigh the site's Greenfield location and thus suggest that planning permission should be granted.

APPENDIX ONE – SITE LOCATION PLAN



KEY

SITE BOUNDARY. ———

SITE LOCATION PLAN
SCALE 1:5000 @ A4

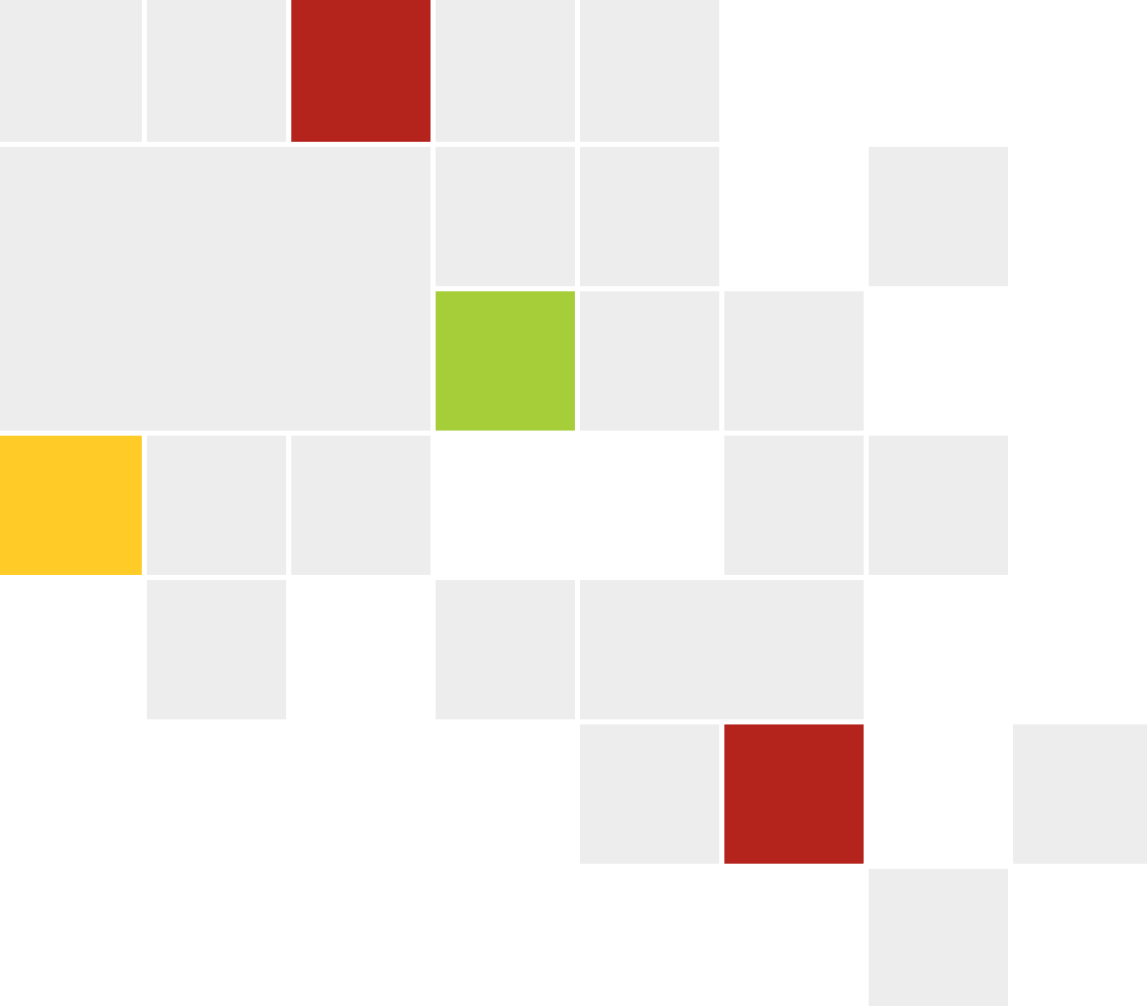
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No.	REVISION	by	date	No.	REVISION	by	date

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