



Figure 5 - Tracks towards the gate off Baglan Way to the east of the site



Figure 6 - Access off Baglan Way



Figure 7 - View across the site from the north



Figure 8 - Facilities and amenities within approx 800m of the site.

3

Interpretation and design development

Pre-application engagement with Local Authority

3.1 A pre-application meeting was held with Planning Officer Kathryn Williams on 14th December 2021 with follow up written response received on the 14th January 2022. The comments received were broadly positive with the Local Planning Authority supporting the principle of development, with the main consideration in the determination of any subsequent planning application being the impact on the SINC. The comments in respect of the proposals can be summarised as follows.

- The principle of industrial development on site was accepted due to its location within the settlement boundary and being set within an industrial/employment context.
- It was noted that any proposal would alter the appearance and character of the site given that it is vacant land.
- The scale and height of the proposed

development is appropriate as it reflects that of the Warburtons Factory to the south of the site.

- The case officer suggested that the design has the potential to provide visual interest along the north-eastern frontage that includes the office and visitor entrance.
- The Ecologist stated that overall, the information submitted to date was acceptable. Further survey work was requested relating to the loss of SINC and breeding birds. The Council also expect the site a 50-year management plan for the remainder of the site.
- A landscaping plan was requested to accompany the full planning application and a two for one ratio of replacement trees for each tree lost was requested.
- It was noted that associated amenity space is sought for employment development proposals over 1000sqm in area, in the

interests of health and well-being of employees. Details of such a provision should be submitted to support any application.

- Flooding and drainage comments sought clarity on the purpose of the bund and reminded the applicant of the need to obtain drainage approval from the Sustainable Drainage Systems (SuDS) Approving Body.
- The Highways Officer accepted the contents of the Transport Information Note in principle and was satisfied with the proposed extent of operation assessment in the proposed Transport Assessment.
- It was raised that the proposed development provides an overprovision of 97 car parking spaces based on Parking Standards Supplementary Planning Guidance (SPG).
- 5% accessible parking spaces are required in each car park, and 10% of spaces are expected to be an electric vehicle charging space.
- Cycle parking spaces required were calculated



at 90 long-stay spaces and 44 short-stay spaces.

- The Highways Officer also provided details of the operational assessment.
- The Noise and Environmental Health Officer agreed with the methodology set out in the noise report. They suggested a planning condition to be imposed due to the impact of the proposed development on nearby receptors.
- The Authority were content that Air Quality impacts are minimal and that they can be controlled through the Construction Environmental Management Plan which would only affect the construction phase of development.
- Regarding ground contamination, no remedial measures are required to made ground. It was requested that the applicant review the potential for the site having been used as a landfill. Further gas investigation was suggested as being required.
- It was recommended that imported materials should be chemically tested and contamination conditions relating to Site Investigation, Remediation Scheme, Verification and Unexpected Contamination was recommended.

- No Heritage and Archaeology impacts are foreseen.
- A separate screening opinion in response to a letter from LRM Planning, as agents to the applicant, confirmed that the site was not EIA (Environmental Impact Assessment) development.

Pre-Application Consultation with the community

- 3.2 A statutory PAC exercise was undertaken with the local community and specialist consultees over 28 days prior to this application being submitted. The PAC process garnered ten responses from neighbours and a voluntary online public consultation meeting was held local residents to discuss the proposal. There were responses from seven specialist consultees, with NRW raising concerns which have been addressed. This is reported upon in detail in the PAC Report submitted alongside this application.

Interpretation of context and design evolution

- 3.3 The context to the site, set out in section 2, provided parameters within which the proposals were shaped from. Chief amongst these are the SINC designation of the site; mature trees and hedgerows bounding the site; its aspect onto main road; and the noise from the M4 running

north-east of the site.

- 3.4 These matters were known from an early stage in the process. Accordingly, the layout and design sought to account for these elements from an early stage.
- 3.5 In addressing these, and comments from the Local Authority, a number of early iterations of the proposals were prepared to arrive at the proposed scheme. To address the matters raised, the design has sought to ensure the footprint of the building is as efficient as possible. Initial designs were formed around the proposed machinery and the scheme designed accordingly.
- 3.6 The proposed design has sought to contain the development to the north-eastern portion of the site to minimise the impact on the SINC and continue the industrial form along Baglan Way, and away from nearest residential receptors. The office facade of the building is also proposed to face Baglan Way to provide visual interest on the most prominent element of the site.
- 3.7 Proposed and existing trees provide a buffer zone within the landscape to enhance the appearance of the development in the context of the wider landscape, noting views towards the site from the Wales Coastal Path that runs along Mynydd Dinas beyond the M4 to the east. Landscaping and trees also provide a natural buffer to the noise from the M4.

- 3.8 Following pre-application discussions car parking provision has been reduced, with a total of 180 spaces now provided. 51 car parking spaces are accessed off Baglan Way and 129 are accessed off Moor Road. Of the 51 spaces accessed off Baglan Way, 18 will include electric vehicle charging points and nine spaces will be accessible bays.
- 3.9 At the time of writing, which is in anticipation of the commencement of Pre-Application Consultation with the local community and specialist consultees, the development team is awaiting feedback from the Sustainable Drainage Approving Body (SAB) in relation to Sustainable Drainage (SuDS) features on site. The layout as currently proposed anticipates SuDS features including detention basins being sited along the northeast site boundary, which is the public frontage of the building. This will be fully developed in time for the full planning application.
- 3.10 Landscaping proposals have also been developed in response to the pre-application feedback, with retention of existing features sought, alongside new landscape features. This includes sitting out spaces for staff of the facility, as requested at the pre-application stage.



Figure 9 - Baglan Way to the north-east of the site



Figure 10 - Access off Baglan Way



Figure 11 - Junction of Moor Road and Baglan Way



Figure 12 - Moor Road along the north of the site



Figure 13 - Bus shelter near Baglan station on the A4241



Figure 14 - Baglan station



Figure 15 - M4 motorway from A4241



Figure 16 - Moor Road along the south-west of the site



Figure 17 - Warburtons factory to the south of the site



Figure 18 - Existing industrial unit at Baglan Industrial Park



Figure 19 - Existing industrial unit at Baglan Industrial Park



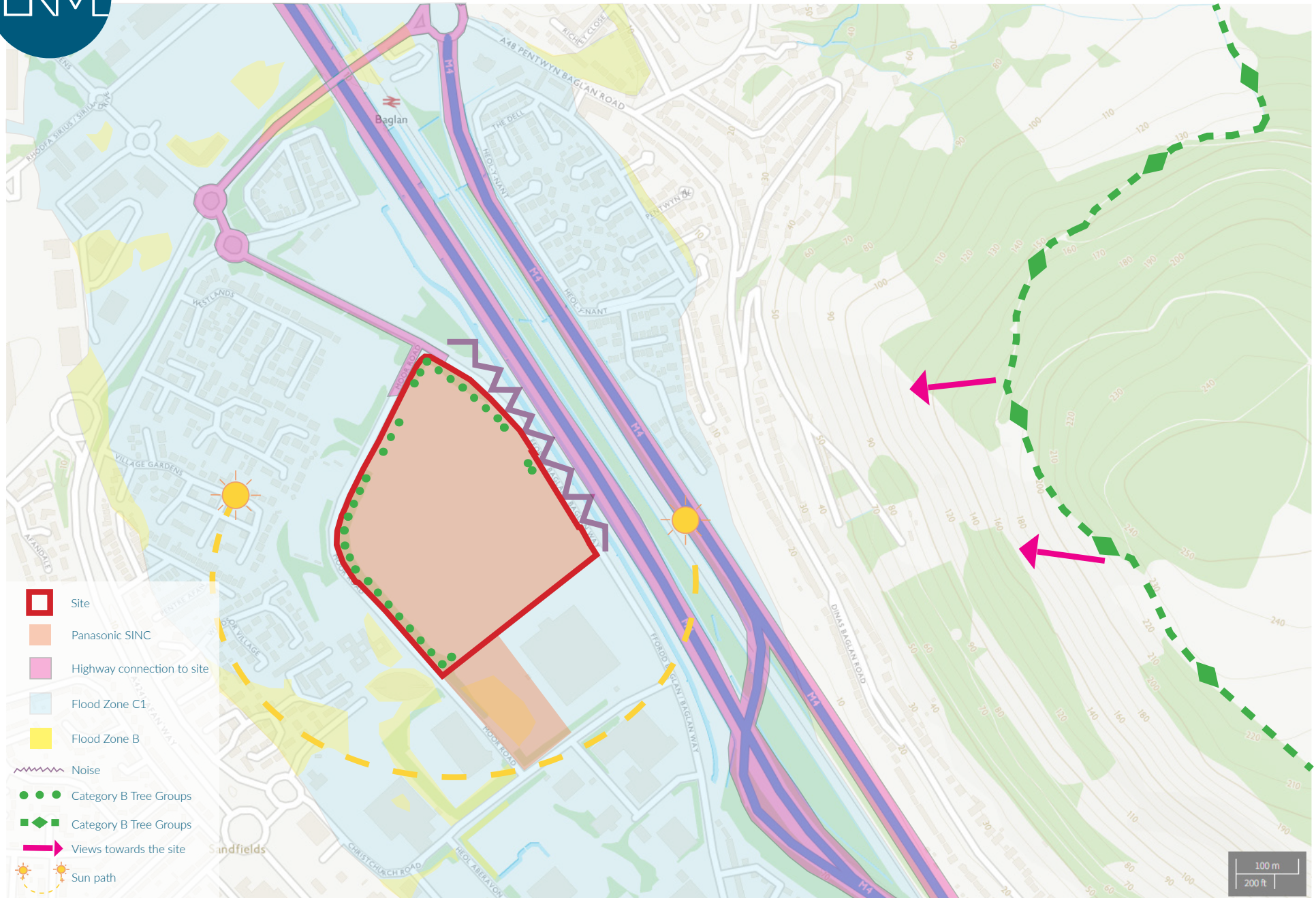
Figure 20 - Existing industrial unit at Baglan Industrial Park



Figure 21 - Existing industrial unit at Baglan Industrial Park

Figure 22 - 3D Aerial View





4

Planning Policy Context

Overview

- 4.1 The planning policy context for the determination of this application is provided by national and local planning policy guidance. National guidance is set out within Planning Policy Wales, and its accompanying Technical Advice Notes.
- 4.2 Local policy comprises the adopted Neath Port Talbot Local Development Plan (2011-2026), and its supporting Supplementary Planning Guidance documents.

Future Wales

- 4.3 Future Wales is Welsh Government's top-tier national development framework. It is a strategy for addressing key national priorities through the planning system over the next two decades, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems, and improving the health and well-being of our communities.

- 4.4 It is a spatial strategy which does not seek to take decisions that are most appropriately taken at the regional or local level, but does provide a strategic direction for all scales of planning and sets out policies and key issues to be taken forward at the regional scale. One of the key aims of the document is to address issues which Welsh Government consider to be a priority at this time.

- 4.5 The document follows a sequential structure, with each section building on the previous one as follows, 'Wales: An Overview', 'Setting and achieving our ambitions', 'Strategic and Spatial Choices: Future Wales' spatial strategy' and 'The Regions'.

Wales: An Overview

- 4.6 This chapter provides a broad overview of the country and its intricacies. It is a very high-level overview of the country, however it 'recognises and supports the important role of businesses of all sizes, from major international manufacturers to micro businesses, in strengthening, diversifying and

increasing the resilience of our economy.'

Setting and achieving our ambitions

- 4.7 A focus of Future Wales is to provide quality development in the right places for the right reasons. 11 Future Wales Outcomes are set out within the chapter, which collectively are a statement of where Wales wants to be in 20 years. Every part of Future Wales is concerned with achieving these Outcomes.
- 4.8 Each Outcome commences with the prefix 'A Wales where people live...' building on the statement to provide a vision of Wales in 2040. Of particular relevance to the proposal are the following outcomes, all following the same prefix:
 - A Wales where people live:
 - 1 '...and work in connected, inclusive and healthy places',
 - 3 '...in distinctive regions that tackle health

and socio-economic inequality through sustainable growth’,

- 5 ‘...and work in towns and cities which are a focus and springboard for sustainable growth’,
- 6 ‘... in places where prosperity, innovation and culture are promoted’,
- 7 ‘...in places where travel is sustainable’,
- 9 ‘...in places that sustainably manage their natural resources and reduce pollution’,
- 10 ‘...in places with biodiverse, resilient and connected ecosystems’, and
- 11 ‘...in places which are decarbonised and climate-resilient’.

Strategic and Spatial Choices: Future Wales’ spatial strategy

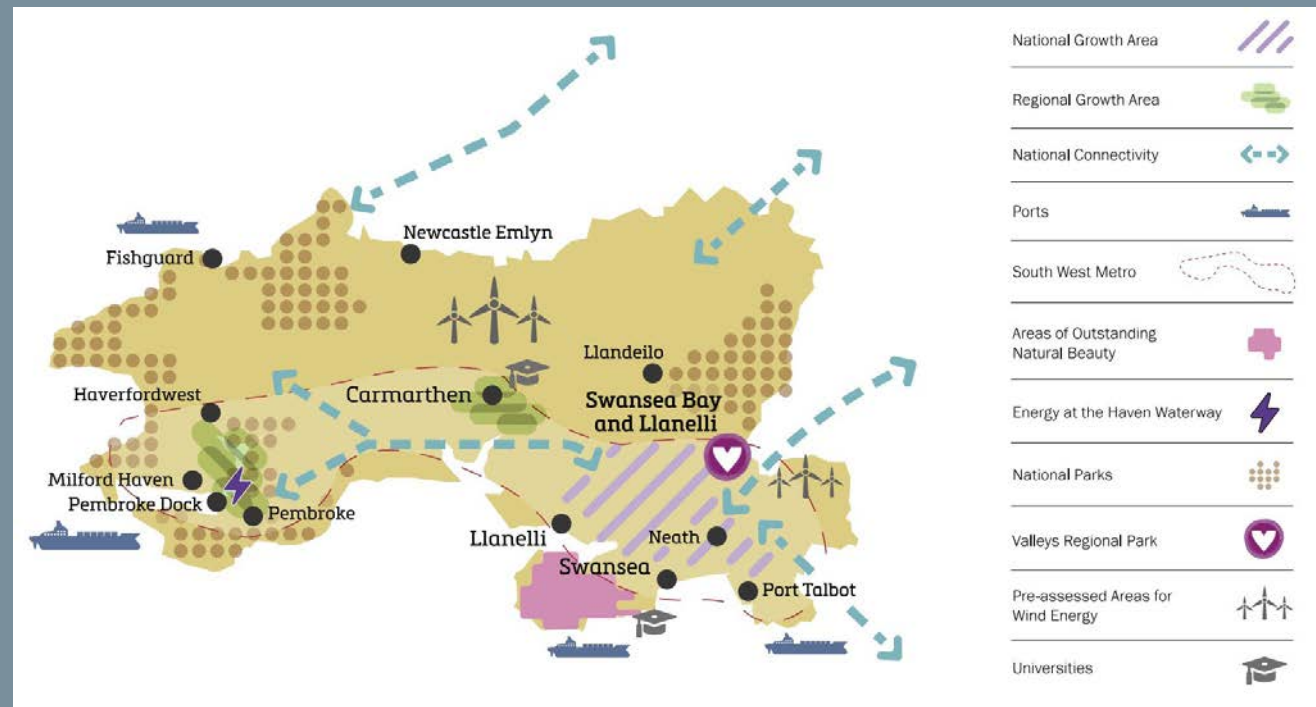
- 4.9 One of the opening paragraphs states that “the spatial strategy supports the Future Wales Outcomes. Decisions taken at a national level, including Welsh Government investment choices, will reflect the principles of the strategy and make positive contributions towards the national placemaking objectives.” Cities and large towns are identified as the main development areas

through co-locating homes, jobs, and services in these areas, aiming to utilise untapped potential of places and their infrastructure. Among the places identified to achieve this growth, referred to as National Growth Areas is Swansea Bay and Llanelli, identified in Policy 1, ‘Where Wales will grow’. A total of 19 policies are identified within this chapter. These include ‘Strategic Placemaking’, ‘Supporting Urban Growth and Regeneration’, among others.

The Regions

- 4.10 Regional planning will play an increasingly important role in the future, and this chapter provides a strategic vision for North, Mid Wales, South West and South East regions, focusing on strategic plans and is therefore of lesser relevance to the proposal. The South West has a population of over 700,000 and includes Swansea Bay and Llanelli a National Growth Area.

Figure 24 - South West strategic diagram - Future Wales 2040w





Planning Policy Wales

- 4.11 Planning Policy Wales (PPW) is the principal national planning policy document which sets out the land use policies of the Welsh Government against which development proposals should be assessed. The latest version is the eleventh edition, published in February 2021.
- 4.12 In a bid to ensure placemaking is prioritised, and to aid in implementing the Well-being of Future Generations Act, policy topics within PPW has been grouped under five themes, comprising: *People and Places: Achieving Well-being through Placemaking; Strategic and Spatial Choices; Active and Social Places; Productive and Enterprising Places; and, Distinctive and Natural Places*, respectively. The subsequent sub-headed chapters are supplemented by detailed and interwoven policy, which seek to work together in delivering sustainable places.
- 4.13 PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. In this regard it seeks to achieve WG's well-being goals. All statutory bodies in Wales carrying out a planning function must exercise those functions with the principles of sustainable development as defined in the Well-being of Future Generations Act. Accordingly, paragraph 1.18 of PPW

states emphatically that '*legislation secures a presumption in favour of sustainable development*'.

- 4.14 Figure 4 of PPW covers the Key Planning Principles of WG in seeking to achieve "*the right development in the right place*". Development proposals must seek to deliver development that addresses these outcomes, albeit paragraph 2.20 recognises that not all of these outcomes can necessarily be achieved under every development proposal.

Strategic and Spatial Choices

- 4.15 It is indicated within PPW that the first stage of the assessment of proposals must take place in respect of Strategic and Spatial Choices. In this regard it is stated that "*Effective strategic placemaking requires early collective consideration of placemaking issues at the outset... when developing specific proposals*".
- 4.16 Paragraphs 3.3 to 3.18 of PPW highlights the importance of good design in "*creating sustainable places where people want to live, work and socialise*". To achieve good design development, proposals need to meet the five overarching aims of design which comprise of access, character, community safety, environmental sustainability, and movement.
- 4.17 PPW seeks to ensure that proposals achieve a broad balance between housing,

community facilities, services, and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. Major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities should be sited within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.

- 4.18 PPW indicates at paragraphs 3.61 to 3.63 that development should be located so that it can be well serviced by existing or planned infrastructure.

Active and Social Places

- 4.19 A key theme of PPW is creating places that are active and social, this includes sustainable transport provision. The opening paragraphs to this chapter include the following aspiration of PPW:

"tackling inequalities between communities, delivering services and jobs closer to where people live and acknowledging the importance of inclusive communities and the wider environment for good health and well-being;"
- 4.20 PPW places importance on locating development so as to minimise the need to travel and increasing accessibility by modes

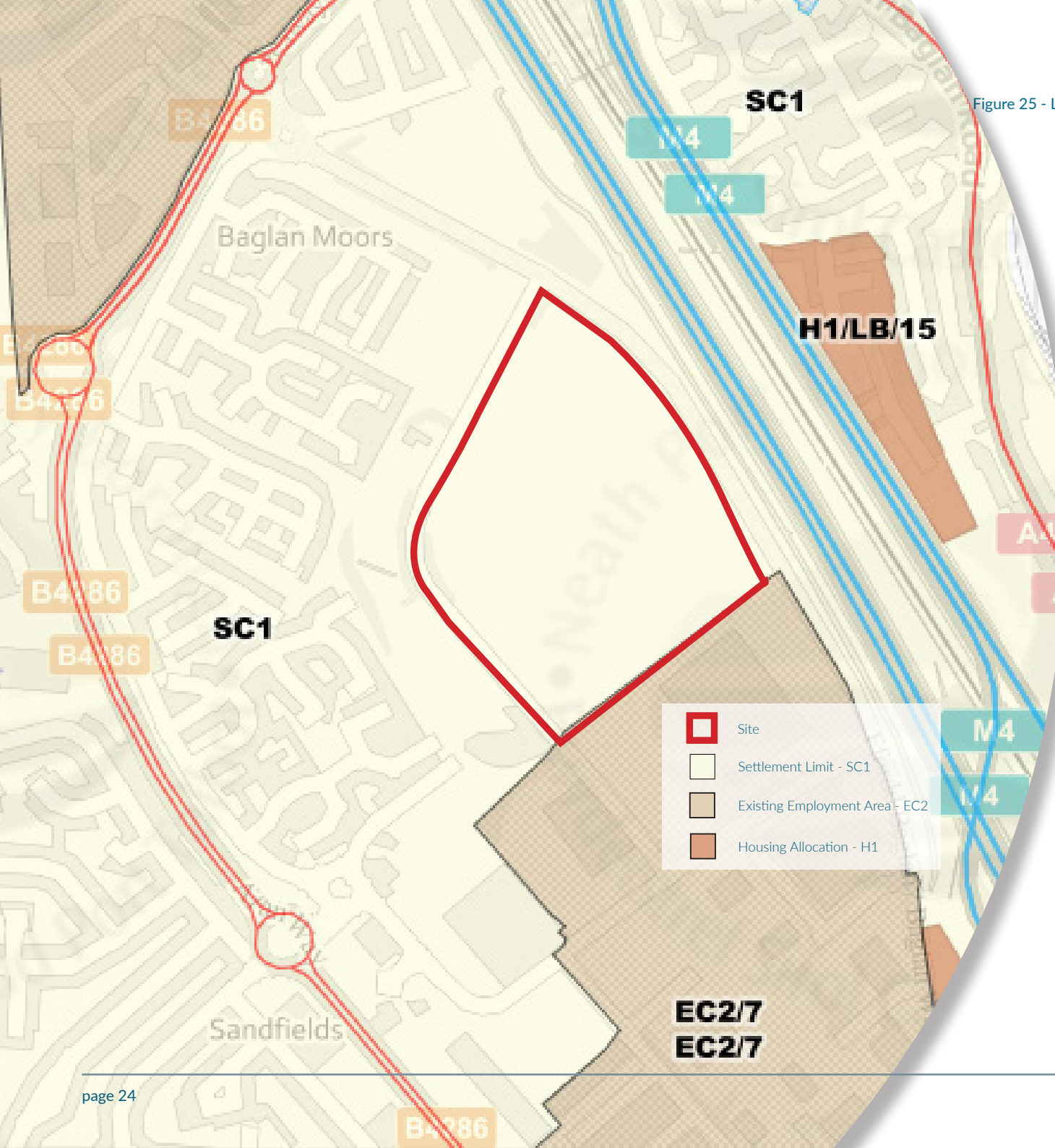


Figure 25 - Local Development Plan Proposals Map

other than the private car.

Productive and Enterprising Places

- 4.21 PPW guides that productive and enterprising places are those which promote economic, social, environmental and cultural well-being by “*providing well-connected employment and sustainable economic development*”. Further, it is indicated that “*increased economic activity across all sectors and at all scales*” will contribute to prosperity of settlements.
- 4.22 PPW further indicates that by “*building on the existing economic strengths of places*” and “*promoting sufficient employment and enterprise opportunities*”, places can become more equal and deliver prosperity for all.

Distinctive and Natural Places

- 4.23 This chapter of PPW covers a range of topics, including cultural heritage matters, natural assets, and environmental quality. The opening statement of the chapter states that:

“Development proposals should be formulated to look to the long-term protection and enhancement of the special characteristics and intrinsic qualities of places...Problems should be prevented from occurring or getting worse. Biodiversity loss should be reversed, pollution reduced, environmental risks addressed and overall resilience of ecosystems



improved.”

Technical Advice Notes

- 4.24 The following Technical Advice Notes (TANs) are of relevance in the consideration of these proposals.
- 4.25 TAN 11, Noise, was published in October 1997, provides advice on how to minimise adverse impacts of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business.
- 4.26 TAN 12 relates to Design and was updated in March 2016. It provides advice and information on a number of related areas including the definition of design for planning purposes; design considerations in planning decisions; and local planning authority design policy and advice.
- 4.27 TAN15, published in July 2004, provides guidance for development in relation to flood risks and offers a framework to assess risks associated with coastal and fluvial flooding.
- 4.28 TAN 18, which was published in March 2007, deals with Transport matters, and advocates locating development where there is good access by public transport, walking and cycling; generally advocating development at sustainable sites.

- 4.29 TAN 23, from February 2014, focuses on economic development, which by definition of the Note, includes any form of development that generates wealth, jobs and income.

Well-being of Future Generations Act

- 4.30 The Well-being of Future Generations Act imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principles, and to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Its content is sought to be delivered through the planning system via the intertwining of the Act through PPW.

Local Development Plan

- 4.31 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. The development plan for the site comprises the Neath Port Talbot Council Local Development Plan (2011-2026).
- 4.32 The site is within the settlement boundary as defined by the Neath Port Talbot Council Local

Development Plan. This site is not subject to any designations. It can therefore be classed as ‘white land’, whereby the principle of development on this site is acceptable, subject to material planning considerations.

- 4.33 Policies with a prefix of SP (strategic policies) are overarching policies relating to development in the county borough. Policy SP1 relates to climate change, and states that an emphasis will be on sustainable growth which benefits Neath Port Talbot as a whole. It outlines that this will be achieved by, *inter alia*:
 - *The efficiency and sustainability of the County Borough’s settlements will be enhanced through developing more cohesive and efficient settlements and settlement patterns, and consequently more sustainable travel patterns; and*
 - *Dependence on the private car and the need to travel in general will be reduced through promoting alternative means of transport and more efficient use of existing facilities, co-location and joint use of facilities.”*
- 4.34 Strategic Policies (SP) for the area provide a basis for the determination of planning applications. Policy SP2 (Health) states that the development of sustainable, safe and confident communities require the co-location of jobs and facilities. The provision of new employment opportunities will



also be promoted to reduce unemployment and economic inactivity rates.

- 4.35 Policy SP5 is relevant for any sites within the Coastal Corridor Strategy Area. Amongst other broad issues, this policy cites the coastal corridor as the area to safeguard existing employment uses and sites for employment purposes.
- 4.36 SP11 (Employment Growth) aims to support new and expanding employment developments through encouraging employment uses within settlement limits, in principle. 96 hectares of land has been allocated for employment and business purposes between Employment growth will play an important role in supporting the local economy
- 4.37 Policy SP18 covers the Authority's approach to Renewable and Low Carbon Energy, whereby it is encouraged where possible in new developments. SP19 (Waste Management) includes amongst its aim the need to ensure that new development provides for the sustainable management of waste.
- 4.38 SP20 (Transport Network) requires development proposals to be designed to provide safe and efficient access and promote sustainable transport. Developments also require appropriate parking provision. SP20 links to SP2 in that new development proposals should be accessible by a variety of means, not just

private car in the interest of creating sustainable communities. Walking, cycling and public transport play an important role in reducing the number of shorter journeys taken by car and contribute towards the Plan's aim to provide a sustainable more integrated transport network.

- 4.39 Policy SC1 relates to settlement limits and states that development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.
- 4.40 The Settlement Hierarchy at table 3.1 of the LDP has identified communities that have sufficient capacity to accommodate new development within designated boundaries. Port Talbot is one of three settlements that lie at the top of the hierarchy as it is a regionally important settlement providing the widest and most diverse range of functions. Further, Port Talbot is located on the strategic road network, and is fully accessible by a range of transport options.
- 4.41 Policy I1 relates to Infrastructure Requirements and states that provision for various resources and amenities must be considered. This includes community and public transport.
- 4.42 Policy EC3, Employment Area Uses, requires developments to demonstrate that proposals do not cause any adverse impacts on the

overall function of the employment area and neighbouring commercial and residential properties. It also requires proposals to be sustainably justified in the location and appropriate in scale and form to the role and function of the employment area.

- 4.43 Policy OS1, Open Space Provision, requires that provision is made for open space where a local deficit is identified.
- 4.44 Policy RE2 relates to Renewable and Low Carbon Energy in New Development and encourages on-site zero / low carbon technology.
- 4.45 Policy EN6 covers Important Biodiversity and Geodiversity Sites, including Sites of Interest for Nature Conservation (SINC). Proposals should preserve and, where possible, enhance the natural heritage importance of the site. Developments will be permitted where they cannot reasonably be located elsewhere, and the benefits of the development outweigh the natural heritage importance of the site. This links to Policy EN7 which seeks to protect Important Natural Features.
- 4.46 Policy EN8 relates to Pollution and Land Stability and requires that new proposals must adequately consider, and address where necessary, any impacts arising from pollution resulting from new development.



4.47 Policy W3, Waste Management in New Development, seeks to ensure that provision is made for design, layout, storage and management of the waste in new developments, both during construction phase and occupation. Early consideration of the waste management needs for any proposal is essential to ensure planning for waste is considered at the outset.

4.48 Policy TR2 covers Design and Access of New Development. It legislates how access must be accounted for in new development. This includes ensuring that new development does not compromise safety, effectiveness and efficiency of the highway network; that cycle and car parking provision is delivered at an appropriate level; and that sustainable travel options are provided where possible.

4.49 Policy BE1, Design, emphasises the importance that a new development achieves and creates attractive and safe places. It sets out a series of criteria that are sought to be achieved on new development proposals. This includes considerations of character, context, materials, highway safety, local features, security, transport connectivity, use of resources, drainage and layout.

4.38 A summary of the pertinent LDP policies is provided below, listed in the order they appear in the LDP.

LDP Policy	Relating to
Strategic Policies	
SP1	Climate Change
SP2	Health
SP3	Sustainable Communities
SP4	Infrastructure
SP5	Development in the Coastal Corridor Strategy Area
SP10	Open Space
SP11	Employment Growth
SP15	Biodiversity and Geodiversity
SP16	Environmental Protection
SP18	Renewable and Low Carbon Energy
SP19	Waste Management
SP20	Transport Network
SP21	Built Environment and Historic Heritage
Topic based Policies	
SC1	Settlement Limits
I1	Infrastructure Requirements
EC3	Employment Area Uses
OS1	Open Space Provision
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
EN8	Pollution and Land Stability

RE2	Renewable and Low Carbon Energy in New Development
W3	Waste Management in New Development
TR2	Design and Access of New Development
BE1	Design
TO4	Walking and Cycling Routes

Supplementary Planning Guidance

4.39 Is it considered that the following SPG documents are applicable in consideration of the proposed development:

- Open Space and Greenspace (July 2017);
- Planning Obligations (October 2016);
- Design (July 2017);
- Car Parking Standards (October 2016);
- Pollution (October 2016); and
- Renewable and Low Carbon Energy (July 2017).

5

The proposal & assessment against objectives of good design

- 5.1 The aim of the development is to provide additional processing space, storage, staff facilities and office space at a single venue which will consolidate existing functions of the business, and allow Glass Systems Ltd to benefit from new business opportunities, to expand their business, and to provide new job opportunities for the local community.

Character

- 5.2 The design, by James & Nicholas LLP, has sought to provide a development that adheres to modern principles of placemaking and construction, that corresponds to its context by taking into consideration the wider industrial setting.
- 5.3 The proposal is to develop a new processing unit, storage building, and new welfare facilities for staff. It will also incorporate an office block. The building measures 25,545m², with a mezzanine office space fronting onto Moor

Road that includes a first-floor space measuring 1,355m² internally.

- 5.4 The elevations comprise typically industrial materials, which prioritise functionality and longevity. In this regard, the structure comprises of steel frame cladding with composite 1m wide panel cladding and a small brickwork plinth, planar glazing to the office and administrative quarters, insulated sectional doors, steel personnel doors and single ply roof membrane. Both material choices and façade grid size (1m) aim to create a uniform and coherent appearance across the whole facility. The warehouse loading bay on the north-western and south-eastern facade are interspersed with roller shutters.
- 5.5 In terms of design, the proposed development adopts a layout which considers the immediate site constraints together with the wider landscape and ecological considerations to deliver a design which is cohesive with uses in

Figure 26 - Welsh Government's Objectives of Good Design (source: Planning Policy Wales)

