



**LRM**  
PLANNING  
LIMITED

# LAND AT BAGLAN WAY, PORT TALBOT

## PRE-APPLICATION CONSULTATION REPORT

Prepared by LRM Planning Limited  
on behalf of Glass Systems Limited

May 2022



## Report Control

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# 1 Introduction

- 1.1 This Pre-Application Consultation Report has been prepared on behalf of Glass Systems Limited to accompany a full planning application for the development of a glass processing industrial unit (B2 use class) and associated works on land sited at the corner of Moor Road and Baglan Way, north of Baglan Industrial Park, Port Talbot. The floorspace of the industrial unit measures 25,545m<sup>2</sup> including a mezzanine office measuring 1,355<sup>2</sup>. In addition, landscaping, access, car parking, bicycle and refuse storage, sustainable drainage and associated infrastructure are proposed. A site location plan is included at appendix 1.
- 1.2 This report, and the consultation process, has been carried out in accordance with legislation provided by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. Specifically, the report complies with the requirement for major development (in this case, a development comprising of 1,000sqm or more of new floorspace) to carry out a pre-application consultation exercise with the local community, stakeholders and specialist consultees.
- 1.3 This report outlines the legislative framework of the mandatory exercise; the methodology used; the outcome of the statutory exercise; the applicant's response to comments received; and a conclusion of the main findings.



## **2 Statutory Pre-Application Consultation requirements**

- 2.1 This Pre-Application Consultation Report has been prepared in line with legislation provided by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. A summary of the key requirements of this is provided here.

### **Display of site notices**

- 2.2 The applicant must display a site notice in at least one place on or near the land to which the proposed application relates for a period of no less than 28 days before submitting an application for the proposed development. It is at the discretion of the applicant if the consultation period is to last longer than 28 days.

### **Publication of draft planning application**

- 2.3 The applicant must make the draft planning application information available publicly. As per the guidance, when this takes the form of a webpage where the requisite information is freely available, the applicant must advertise a local library where residents are able to access the documents online. This must include draft planning application forms; scaled site location plan; all other scaled plans (site layout, floor plans, elevations); Design and Access Statement; and any information that would be needed in order to comply with any local validation requirements of the Local Planning Authority.

### **Advertisement to interested local persons and specialist consultees**

- 2.4 The applicant must write to any owner or occupier of any land adjoining the land to which the proposed application relates. It is at the discretion of the applicant as to whether this advertisement extends beyond the mandatory requirements. The applicant must also consult 'community consultees' (local/community and Ward Councillors); and 'specialist consultees'. Specialist consultees comprise the list of consultees in schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by the 2016 Order. Within this list, the applicant must identify the relevant specialist consultees depending on the site and its context.

### **Summary of responses received**

- 2.5 The applicant must review and summarise the responses received from all persons and bodies consulted during the statutory 28-day period.

### **Resulting actions from responses received**

- 2.6 The applicant must provide comments as to how each response received from consultees has been considered through the application.



### 3 Methodology

- 3.1 The requirements of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 were adhered to through the pre-application consultation process. The following paragraphs outline the methodology that LRM Planning has undertaken on behalf of the applicant in respect of the proposed industrial development on land at Baglan Way, Port Talbot. The consultation took place between the 4<sup>th</sup> February 2022 and the 4<sup>th</sup> March 2022.

#### **Display of site notices**

- 3.2 Bilingual site notices were produced and displayed at prominent and visible locations on the site entrances off Baglan Way, the northern corner of the site on Moor Road and Baglan Way and south-western boundary of the site off Moor Road.
- 3.3 The site notices were erected on Friday 4<sup>th</sup> February 2022. Copies of the notices are available at appendix 2, and a map and photographs showing the locations that the notices were displayed is available at appendix 3. A declaration of the posting of the site notices is supplied at appendix 4.

#### **Publication of draft planning application**

- 3.4 On Friday 4<sup>th</sup> February, LRM Planning, as the applicant's agent, displayed a draft planning application package on its website ([www.lrmplanning.com](http://www.lrmplanning.com)), which was made available for the statutory 28-day consultation period. The information displayed on the LRM Planning website comprised the following:

- Draft Planning Application Forms
- Design and Access Statement
- Arboricultural Method Statement
- Archaeology and Heritage Statement
- Drainage Strategy
- Ecological Appraisal Report
- Ecological Method Statement
- Flood Consequence Assessment
- Geotechnical and Geoenvironmental Report
- Ground Gas Monitoring Report and Assessment
- Landscape and Visual Baseline
- Noise Assessment
- Outline Drainage Strategy
- Phase 1 Habitat Plan
- Transport Assessment
- Travel Plan
- Tree Constraints Plan
- Drawings:



- Site Location and Block Plan
- Proposed Site Plan
- Topographical Survey
- General Arrangement Plan – Ground Floor
- General Arrangement Plan – First Floor
- General Arrangement Plan – Ground / First Floor Admin Staff Area
- 3D Images – Pages 1-10
- 3D Images – Pages 11-14
- General Arrangement Sections Sheet 01
- General Arrangement Sections Sheet 02
- Elevations

### **Advertisement to interested local persons and specialist consultees**

- 3.5 The publicity to neighbours comprised a letter-drop to some 130 addresses, which included all adjoining landowners and a number of additional properties identified by the development team.
- 3.6 A copy of the letter issued to local owners and occupiers of the surrounding dwellings/land is provided at appendix 5, which was accompanied by a copy of the notice contained at appendix 2. A map of the surrounding area, showing the extent of the letter drop, is displayed at appendix 6.
- 3.7 An email and attached notice were issued to the following persons in their roles as Ward Councillors for the locality:
- **Councillors Scott Bamsey, Nigel Thomas Hunt and Stephanie Lynch** as ward councillors for Aberavon, the Ward in which the site lies.
- 3.8 A copy of the email issued to Ward Councillors is provided at appendix 7.
- 3.9 An email and notice were also issued to the following bodies in their roles as identified specialist consultees in accordance with the requirements listed in the table under schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016:
- **Neath Port Talbot Council Highways Authority** – as the development is likely to result in a material increase in the volume of traffic entering or leaving a classified road; the development involves the formation or alteration of a means of access to a highway; and as an adjoining landowner.
  - **Dŵr Cymru Welsh Water** – as the water and sewerage undertaker concerned and the development involves new industrial development.
  - **The Coal Authority** – as the development lies within an area which has been notified for the purpose of this provision to the local planning authority by the Coal Authority because of the presence of land instability risks from coal mining.
  - **Cadw** – as the development measures over a hectare and is within a distance of 3 kilometres from the perimeter of multiple scheduled monuments, in the form of Ruins



of St Baglan's Church (0.75km north-east), Plas Baglan (0.90km north-east), Craig Ty Isaf Camp (1.8km north-east), Cwm Clais Castle Mound (1.9km east), Briton Ferry Dock Entrance (2.2km north-west), Buarth y Gaer (2.4km north-east), and Mynydd y Gaer (2.9km north-east).

- **Natural Resources Wales** – The development is within 250 metres of land which has, at any time in the 30 years been used for the deposit of refuse or waste.
- **Fire and Rescue Authorities** – as the floor space to be created by the development is 1,000 square metres or more; and development carried out on a site having an area of 1 hectare or more.

3.10 The email and notice were also addressed to the following non-statutory bodies voluntarily to provide an opportunity to comment on the proposed development prior to submission, and to allow the applicant and its team to ascertain if there were likely to be any other issues raised by future consultees to the planning application.

- **National Grid;**
- **Western Power;**
- **Wales and West Utilities;**
- **Glamorgan Gwent Archaeological Trust;**
- **Designing Out Crime Officer (South Wales Police);**
- **Neath Port Talbot Biodiversity Officer; and**
- **Neath Port Talbot Case Officer.**

3.11 A copy of the emails issued to specialist and voluntary consultees is provided at appendix 8, which was issued with a copy of the notice at appendix 2 attached.

### **Non-statutory consultation**

3.12 During the statutory consultation process Local Councillor Stephanie Lynch received a request from neighbours to the site to explore the possibility of a greater level of public engagement. It was explained to residents that whilst hosting of a public exhibition is not a mandatory requirement of the PAC process, the applicant was willing to host an online session with interested parties in order to answer queries that had been raised. The online consultation event held between the hours of 4pm and 6pm on Thursday 3<sup>rd</sup> March 2022, as agreed with Councillor Lynch. The event was attended by eight interested local parties, including Councillor Lynch. The development team in attendance at the meeting included the project manager from CJ Construction, flooding and drainage consultant from JBA Consulting, transport consultant from Apex Transport Planning consultant, ecologists from EDP, and planning consultants from LRM Planning.

3.13 The development team each answered comments received via the formal PAC process regarding their respective disciplines. Local residents were also able to contribute to the discussion via a chat box function. Some of the interested parties who attended had already provided comments to the development team through the PAC process with the comments raised included in the statutory results outlined below.

3.14 After the meeting, it was informally observed by the local councillor that the event had been



useful to clarify and appease certain concerns, thus the event was considered a worthwhile process in engaging the local community.

### **Post-PAC amendments to proposals**

- 3.15 After the conclusion of the PAC process, the applicants sought to finalise plans in readiness for the planning submission. In doing so, the building was reviewed further from an operational perspective, taking guidance from operational undertakings, and success and failures, of other factories within the portfolio of the company and its parent company. The assessment concluded that efficiencies of operation for the building would necessitate some changes to the building footprint. The width of the building was sought to be increased by about 3m and the length of the building by about 18m. This has resulted in an increase to the building footprint by approximately 10%. In the context of the scale of the building and the size of the site, this results in a fairly negligible alteration in the appearance of the building. The red line boundary and therefore site area have not been increased.
- 3.16 Guidance on PAC is now contained within the Development Management Manual, published by Welsh Government. This does not contain any guidance about changes post-PAC, but it is roundly accepted in the experience of LRM Planning that PAC is conducted at final draft stage, and post-PAC changes are entirely legitimate. The fundamental scheme proposals have not changed in that the purpose of the building and all relevant principles remain the same, it is only a non-prejudicial alteration to the building form that is proposed. Crucially, given the distance to the nearest neighbours, there was concluded to be no greater impact upon third parties.
- 3.17 Accordingly, it was decided that the change in the building between PAC and submission would not prejudice any third party, as the impact upon neighbours is no greater, given significant separation distances and the scale of the building already consulted upon at PAC stage. Therefore, following consultation with Neath Port Talbot County Borough Council, it was concluded that the PAC process undertaken was satisfactory and sufficient to support the planning application.



## 4 Statutory Pre-Application Consultation results

4.1 During the consultation period, the responses received can be summarised as follows:

- 10 responses were received from local residents and interested parties.
- One response was received from a Local Councillor.
- Responses were received from five specialist statutory consultees in the form of Dŵr Cymru Welsh Water (DCWW), Natural Resources Wales (NRW), Cadw, The Coal Authority and Neath Port Talbot Highway Authority.
- Two responses were received from non-statutory specialist consultees in the form of Designing Out Crime Officer (DOCO) and Glamorgan-Gwent Archaeological Trust (GGAT).
- No response was received from the Fire and Rescue Authorities.

4.2 Appendix 9 includes the response received from local councillor, appendix 10 comprises the response from specialist consultees and non-statutory consultees.

### Local residents' comments

4.3 There was a total of 10 comments received from local residents and interested parties. The table below has sought to summarise and group the main themes of comments received from local residents and Councillor Nigel Thomas Hunt.

| Comment / Issue                                                                                                                                                  | Number of responses<br>(Councillor comments<br>shown in brackets) |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| <b>Drainage and flooding</b>                                                                                                                                     |                                                                   |
| Concern that the proposed development will increase flooding issues in the vicinity                                                                              | 8 (1)                                                             |
| Comment that the ground in the local area is saturated and concern it will worsen with the loss of greenfield land                                               | 5 (1)                                                             |
| Query who will be held responsible if flooding worsens and suggestion that compensation should be paid to residents in such an eventuality                       | 2 (1)                                                             |
| Highlights that a flood warning was issued in the area in the week commencing 14 <sup>th</sup> February 2022, and query why it was only issued to some residents | 1 (1)                                                             |
| Dispute that the site poses a very low risk to flooding and the figures in the Flood Consequence Assessment                                                      | 1                                                                 |



|                                                                                                                                                                        |       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Query how the proposed development will impact flood risk in the local vicinity                                                                                        | 1     |
| Comment that the proposal makes no mention of climate change and changing weather conditions                                                                           | 1     |
| Note that the Drainage Strategy concludes that infiltration of surplus water into the existing soil both on and outside the site is unviable                           | 1     |
| The combination of mudstone and clay do not provide easy drainage for storm volume rainfall                                                                            | 1     |
| Comment that the site was classified as a C2 flood zone by Natural Resources Wales (NRW) until March 2017 and comment that the calculations are based on C1 flood zone | 1     |
| Comment that there was a flash flood in Pentre Afan in 2020                                                                                                            | (1)   |
| Query whether the ponds within the site will manage in extreme weather                                                                                                 | (1)   |
| Query whether Baglan Brook will be able to accommodate extra water and what will happen if the Seaway Parade pumping station fails                                     | (1)   |
| <b>Noise and light pollution</b>                                                                                                                                       |       |
| Concern regarding potential noise generated from the factory and query how noise pollution will be managed to minimise disruption to neighbouring residents            | 6 (1) |
| Seek clarification on light mitigation measures                                                                                                                        | 1     |
| <b>Ecology</b>                                                                                                                                                         |       |
| Note that the site is designated Site of Importance for Nature Conservation (SINC) and assertion that there are protected species on site                              | 5 (1) |
| Comment that the site is the only significant area of biodiversity and green space left in the ward and is beneficial to the well-being of local residents             | (1)   |
| Suggestion that the site has the potential to be a nature reserve                                                                                                      | (1)   |



|                                                                                                                                                                                                                                                                                                                                            |       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Note that the site has three primary species and nine contributory species                                                                                                                                                                                                                                                                 | (1)   |
| Suggest that any development that loses the SINC status of the site should form equivalent mitigation                                                                                                                                                                                                                                      | (1)   |
| Claim that RSPB Red Listed Birds have been recorded on the site including Lapwing, Common Linnet, Starling, Bullfinch, Cetti Warbler, Reed Bunting and Snipe, in addition to other species that have high conservation status including the shrill carder bee, the brown banded carder bee, the assassin bug and the Five Spot Burnet Moth | (1)   |
| Comment that St Joseph's Primary School chose to complete a mural about the biodiversity of the site in an Aberafan Subway                                                                                                                                                                                                                 | (1)   |
| <b>Access, traffic and parking</b>                                                                                                                                                                                                                                                                                                         |       |
| Concern of increased congestion as a result of the proposed development and proposed mitigation                                                                                                                                                                                                                                            | 2 (1) |
| Suggest that the parking provision is inadequate for the proposed development                                                                                                                                                                                                                                                              | 1     |
| Concern of increased number of lorries parking Moor Road                                                                                                                                                                                                                                                                                   | 1     |
| <b>Glass Systems Ltd</b>                                                                                                                                                                                                                                                                                                                   |       |
| Contention that there have been disputes regarding waste outside current factories due to plastic used to separate glass, waste left by delivery drives and broken glass                                                                                                                                                                   | 2 (1) |
| Comment that Glass Systems Ltd. are not good neighbours                                                                                                                                                                                                                                                                                    | 1 (1) |
| <b>Alternative sites</b>                                                                                                                                                                                                                                                                                                                   |       |
| Query whether other sites have been considered for development and suggest brownfield sites in the vicinity                                                                                                                                                                                                                                | 2 (1) |
| <b>Air Quality</b>                                                                                                                                                                                                                                                                                                                         |       |
| Concern regarding emissions from the proposed development                                                                                                                                                                                                                                                                                  | 1     |
| Note that in 2018 Welsh Government WelTAG (Welsh transport appraisal guidance) proposed closing a motorway                                                                                                                                                                                                                                 | (1)   |



|                                                                                                                                                                                       |     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| junction that affects the M4 that is less than 100 metres from the proposed development site                                                                                          |     |
| WelTAG Report noted the level of NOx to be unacceptable and requires mitigation. The rates of cancer and respiratory illness are high and unacceptable in the air quality in the area | (1) |
| <b>Construction</b>                                                                                                                                                                   |     |
| Query as to which construction firm will build the factory                                                                                                                            | 1   |
| Query the start date and duration of construction                                                                                                                                     | 1   |
| <b>Other</b>                                                                                                                                                                          |     |
| Seek confirmation of the number of employees, specifically how many will be employed from existing sites; how many new employees will be hired                                        | 1   |
| Query the operating hours of the factory                                                                                                                                              | 1   |
| Note that a historical field which formed part of the site was formerly known as Clawdd Coch Ucha.                                                                                    | (1) |

### Statutory bodies' responses

- 4.4 **Dŵr Cymru Welsh Water (DCWW)** offered no objection to the proposed development and sought to make the applicant aware of the regulations regarding sustainable drainage as outlined in Schedule 3 of the Flood and Water Management Act 2010, which requires the applicant to obtain sustainable drainage approval in respect of the proposed development. They acknowledge receipt of the drainage strategy which indicates proposals to dispose surface water flows to an adjacent surface water body and in principle offer no objection. They also advised that there are no problems envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from the site.
- 4.5 In addition, DCWW confirmed foul flows only from the proposed development can be accommodated within the public sewerage system. They sought to remind the applicant that if the development will give rise to a new discharge (or alter an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Dŵr Cymru / Welsh Water.
- 4.6 In order to establish what would be required to serve the site with an adequate water supply, DCWW stated that it will be necessary for the developer to fund the undertaking of a hydraulic modelling assessment on the water supply network.
- 4.7 **Natural Resources Wales (NRW)** requested additional information regarding flood risk and



breeding birds to overcome concerns raised with the application. Regarding Flood Risk, suggested that the Flood Risk Assessment Wales (FRAW) data quoted in section 4 of the Flood Consequence Assessment (FCA) cannot be used to discount tidal flood risk and that the latest Flood Map for Planning (FMfP) should be reviewed to assess the tidal flood risk. NRW also commented that the Authority needs to assess if the access and egress of the site can be managed due to flooding of Moor Road and Baglan Way.

- 4.8 With regards to Ecology and Breeding Birds, NRW are aware of several records of Lapwing at the site and in the surrounding area, therefore breeding birds survey should be scoped with the Local Authority Ecologist. It was also noted that the site forms part of the Panasonic Site of Importance for Nature Conservation (SINC), as this is a site of local importance, they deferred to the Local Authority to consider impact and mitigation.
- 4.9 Comments were also provided on Land Contamination, which were based on their assumption that gross contamination is not present at this location. NRW suggested that the Aquifer designations in the Terra Firma report were incorrect, stating that the superficial deposits are Secondary B and the bedrock Secondary A. NRW also noted a discrepancy in section 4.2 of the report in that, although there are no previous industrial uses on the site and the former BP Chemical works is 900m away, one of the sources has been listed as Isopropanol in the groundwater. However, this is not present in the groundwater samples that have been supplied.
- 4.10 **Cadw** offered no objection as their records show that there are no scheduled monuments or registered historic parks and gardens that would be affected by the proposed development. They suggested that the applicant consult with the Historic Environment Record held by Glamorgan-Gwent Archaeological Trust.
- 4.11 **The Coal Authority** confirmed that there are no recorded coal mining legacy hazards at shallow depth that could pose a risk to land stability at this site. Accordingly, there is no requirement for the applicant to submit a Coal Mining Risk Assessment in support of any formal planning application for the redevelopment of this site.
- 4.12 **The Highways Authority** had no objection in principle to the proposed development and offered observations on the proposals. They noted that the proposed new vehicular access point shall tie into and be constructed to the adoptable standard and specification of the highway authority. Additionally, visibility splays should be provided as detailed in Planning Policy Wales Technical Advice Note 18, and any proposed gates adjacent to the highway should be of a type that open inwards only and are setback within the site to allow vehicles to be removed from the public highway whilst the gates are opened/closed.
- 4.13 The applicant was reminded that details of any signage required within or on the external public highway will need to be submitted for approval along with lumen levels should they be illuminated. Parking complied with guidance set out in the Parking Standards Supplementary Planning Guidance. The operational manoeuvring areas and proposed cycle stands were also noted as being acceptable in terms of area and location.



### **Non-statutory bodies' responses**

- 4.14 **Designing Out Crime Officer** offered standard advice relating to industrial development. It was noted that the whole site should be protected by security fencing at least 2.4m in height, manufactured of weld mesh, expanded metal or similar and be of a design that is difficult to climb over. Vehicle access onto site should be controlled by the installation of barriers at the vehicle entrances with access control fitted. Vehicle access onto the sites must be prevented when the site is unoccupied. The whole of this development, especially the vehicle parking areas, should benefit from lighting that meets the British Standard 5489.
- 4.15 **Glamorgan-Gwent Archaeological Trust** stated that it is unlikely that significant archaeological remains will be encountered during the course of the development. As such, should a similar application be submitted, they would be unlikely to recommend any pre-determination works, or that any archaeological conditions are attached to any consent.



## 5 The applicant's response

- 5.1 As required by the legislation governing the pre-application consultation, this section summarises the comments received, and provides the Applicant's response to each. The comments are grouped in themes are addressed accordingly.

### Local residents / interested parties

#### Drainage and flooding

|                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Nature of comment   8/10 local resident/interested party comments; 1/1 Local Councillor:</b><br/>Concern that the proposed development will increase flooding issues in the vicinity.</p>                                                                                    |
| <p><b>Nature of comment   5/10 local resident/interested party comments; 1/1 Local Councillor:</b><br/>Comment that the ground in the local area is saturated and concern it will worsen with the loss of greenfield land.</p>                                                     |
| <p><b>Nature of comment   2/10 local resident/interested party comments; 1/1 Local Councillor:</b><br/>Query who will be held responsible if flooding worsens and suggestion that compensation should be paid to residents in such an eventuality</p>                              |
| <p><b>Nature of comment   1/10 local resident/interested party comments; 1/1 Local Councillor:</b><br/>Highlights that a flood warning was issued in the area in the week commencing 14<sup>th</sup> February 2022, and query why it was only issued to some residents.</p>        |
| <p><b>Nature of comment   1/10 local resident/interested party comments; 0/1 Local Councillor:</b><br/>Dispute that the site poses a very low risk to flooding and the figures in the Flood Consequence Assessment.</p>                                                            |
| <p><b>Nature of comment   1/10 local resident/interested party comments; 0/1 Local Councillor:</b><br/>Query how the proposed development will impact flood risk in the local vicinity.</p>                                                                                        |
| <p><b>Nature of comment   1/10 local resident/interested party comments; 0/1 Local Councillor:</b><br/>Comment that the proposal makes no mention of climate change and changing weather conditions.</p>                                                                           |
| <p><b>Nature of comment   1/10 local resident/interested party comments; 0/1 Local Councillor:</b><br/>Note that the Drainage Strategy concludes that infiltration of surplus water into the existing soil both on and outside the site is unviable.</p>                           |
| <p><b>Nature of comment   1/10 local resident/interested party comments; 0/1 Local Councillor:</b><br/>The combination of mudstone and clay do not provide easy drainage for storm volume rainfall.</p>                                                                            |
| <p><b>Nature of comment   1/10 local resident/interested party comments; 0/1 Local Councillor:</b><br/>Comment that the site was classified as a C2 flood zone by Natural Resources Wales (NRW) until March 2017 and comment that the calculations are based on C1 flood zone.</p> |
| <p><b>Nature of comment   0/10 local resident/interested party comments; 1/1 Local Councillor:</b><br/>Comment that there was a flash flood in Pentre Afan in 2020.</p>                                                                                                            |



**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**  
Query whether the ponds within the site will manage in extreme weather.

**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**  
Query whether Baglan Brook will be able to accommodate extra water and what will happen if the Seaway Parade pumping station fails.

- 5.2 **Applicant's response:** The Flood Consequence Assessment that was published as part of the PAC process and updated since, prepared by JBA Consulting, finds that the site has existing levels ranging from 6.68m Above Ordnance Datum (AOD) to 5.2m AOD approximately and concludes that the site is not at significant risk from any source of flooding, and does not give rise to any unacceptable levels of risk in line with Technical Advice Note 15 and will not increase risk of flooding in the vicinity.
- 5.3 The applicant is aware of ground saturation in the vicinity; however, the proposed drainage strategy will not worsen the existing situation as surface water will be held in basins and ponds on site that will attenuate water into the watercourse to ensure that the saturation will not worsen. The basins will remain largely dry throughout the year aside from periods of rainfall and will manage drainage during periods of extreme weather. Additionally, permeable paving is proposed in the parking areas and water harvesting is proposed for the roof in order to use the water during the glass processing. Attenuation on-site also overcomes issues regarding the infiltration of surplus water into the existing soil being unviable and mudstone and clay not providing easy drainage for storm rainfall.
- 5.4 The applicant must address the potential flooding issues that arise from the proposed development of this site, ensuring no worsening of existing conditions and no unacceptable impacts upon third parties. The applicant cannot be held accountable for any other localised perceptions of increased flooding. The proposed development has demonstrated that it will not give rise to unacceptable level of flood risk, which analyses data that takes climate change into consideration.
- 5.5 Regarding the concerns raised about flood alerts, these are weather warnings covering a fixed period of time and are not intended to be used to assess long-term flood risk for developments.
- 5.6 The calculations are based on the site being located within a C1 flood zone as defined by the Development Advice Maps hosted by Natural Resources Wales. The Development Advice Maps are based on the best available information considered sufficient to determine when flood risk issues need to be taken into account in planning future development.
- 5.7 It is noted that there was a flash flood in Pentre Afan, however as explained above the proposed development will not contribute to flooding impacts.
- 5.8 Basins on site will attenuate water into the brook, with water run-off controlled to be discharged to the nearby Baglan Brook at a flow rate no greater than the QBar (greenfield runoff rate estimation) greenfield equivalent of 4.77l/sha for all events up to and including the 1 in 100 year plus 40% climate change storm event



- 5.9 The failure of the pumping station has been considered and the modelled scenario proves that its failure will not result in any residual risk to the proposed development site due to the resulting impact being shallow flood depths and the excess water largely being contained within Baglan Brook. Impact upon Baglan Brook has also been assessed, with the conclusion that no unacceptable impacts will be arising. The accompanying FCA expands on all of the above points.

### Noise and light pollution

**Nature of comment | 6/10 local resident/interested party comments; 1/1 Local Councillor:**  
Concern regarding potential noise generated from the factory and query how noise pollution will be managed to minimise disruption to neighbouring residents.

**Nature of comment | 1/10 local resident/interested party comments; 0/1 Local Councillor:**  
Seek clarification on light mitigation measures.

- 5.10 **Applicant's response:** Careful consideration has been given to neighbouring properties and the noise generated from rail and road traffic in the vicinity. InAcoustic has been commissioned to assess the impact of noise. The noise assessment is based upon environmental noise measurements undertaken at the site and a subsequent model-based predictive exercise. The noise assessment ensures that noise is designed out of contention, by ensuring that the building fabric and any external plant items are appropriately specified.
- 5.11 As a result of the noise assessment process, noise from the proposals will not materially affect the amenity of the closest residential areas. Consequently, it is concluded that there are no technical constraints to this proposed development from the perspective of noise impact.
- 5.12 Light pollution can be controlled via a suitably worded condition and any signage (directional or otherwise) required for within or on the external public highway will need to be submitted for approval along with lumen levels should they be illuminated. The relative remoteness of the proposed development from local receptors also diminishes any potential impact of light pollution.

### Ecology

**Nature of comment | 5/10 local resident/interested party comments; 1/1 Local Councillor:**  
Note that the site is designated Site of Importance for Nature Conservation (SINC) and assertion that there are protected species on site.

**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**  
Comment that the site is the only significant area of biodiversity and green space left in the ward and is beneficial to the well-being of local residents.

**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**  
Suggestion that the site has the potential to be a nature reserve.

**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**  
Note that the site has three primary species and nine contributory species.



**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**

Suggest that any development that loses the SINC status of the site should form equivalent mitigation.

**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**

Claim that RSPB Red Listed Birds have been recorded on the site including Lapwing, Common Linnet, Starling, Bullfinch, Cetti Warbler, Reed Bunting and Snipe, in addition to other species that have high conservation status including the shrill carder bee, the brown banded carder bee, the assassin bug and the Five Spot Burnet Moth.

**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**

Comment that St Joseph's Primary School chose to complete a mural about the biodiversity of the site in an Aberafan Subway.

- 5.13 **Applicant's response:** It is noted that the site is designated as a Site of Importance for Nature Conservation (SINC) with the main interest being the post-industrial habitat. 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 intention is to bring the retained areas of on-site SINC into regular long-term management. Provision of structural landscaping, a mix of native and non-native trees and shrubs are proposed throughout the site for biosecurity, diversity of ecosystems and habitat creation, as well as strengthening of screening and protection of visual amenity. A green roof is proposed to the office element of the proposals, which will mitigate for loss of the SINC and provide biodiversity benefits for the lifetime of the development.
- 5.14 With regards to bats, plantation woodland bounding the site provide a linear feature for bats commuting across the wider landscape, whilst habitats on site are of value for a bat assemblage more generally. Surveys indicated bat activity is dominated by relatively low levels of common pipistrelle and soprano pipistrelle bats.
- 5.15 Invertebrate surveys identified 211 species, 31 of which were deemed to be of conservation interest. No notable populations of breeding birds were found given the relatively small size of the site and prevalence of tall tree lines and buildings immediately adjacent which would deter many ground nesting species. The presence of badgers, dormice, otters, and great crested newt were also surveyed but no evidence of their presence was found.
- 5.16 Further detail in this regard is available in the accompanying ecological report prepared by EDP, which conclude that, subject to implementation of proposed mitigation measures, the scheme is capable of compliance with relevant planning policy for the conservation of the natural environment at all levels.
- 5.17 Regarding breeding birds, the necessity for further bird surveys have been scoped out, and instead presumes presence of a breeding bird assemblage. Mitigation is provided within the Ecological Appraisal report submitted with the planning application. This was agreed with the Local Authority. Further detail is provided in response to Natural Resources Wales comments in section 5.30-5.36 of this report.



- 5.18 It is noted that St Joseph's Primary School chose to complete a mural about the biodiversity of the site in an Aberafan Subway. The south-western portion of the site will be put into long-term management to mitigate the loss of the SINC. This will maintain the biodiversity on site.

### Access, traffic and parking

**Nature of comment | 2/10 local resident/interested party comments; 1/1 Local Councillor:**  
Concern of increased congestion as a result of the proposed development.

**Nature of comment | 1/10 local resident/interested party comments; 0/1 Local Councillor:**  
Suggest that the parking provision is inadequate for the proposed development.

**Nature of comment | 1/10 local resident/interested party comments; 0/1 Local Councillor:**  
Concern of increased number of lorries parking Moor Road.

- 5.19 **Applicant's response:** Apex Transport Planning have undertaken detailed operational assessments which demonstrate that the low level of traffic generation in the network peak hours from the site would not have a material impact on flows or congestion on the local highway network.
- 5.20 180 car parking spaces are being provided for the whole site, in line with local standards as dictated by the Parking Standards Supplementary Planning Guidance document, which requires industrial units to have a maximum of one space per 120sqm of floor area, whilst encouraging sustainable travel to minimise parking demand and impacts on the network.
- 5.21 With regards to lorry parking, there is a significant on-site operational area which can accommodate all expected operational vehicles comfortably and will not result in overspill onto Moor Road.

### Glass Systems Ltd

**Nature of comment | 2/10 local resident/interested party comments; 1/1 Local Councillor:**  
Contention that there have been disputes regarding waste outside current factories due to plastic used to separate glass, waste left by delivery drives and broken glass..

**Nature of comment | 1/10 local resident/interested party comments; 1/1 Local Councillor:**  
Comment that Glass Systems Ltd are not good neighbours.

- 5.22 **Applicant's response:** Comments relating to issues at existing factories, including waste, whilst not material planning considerations, have been passed onto the applicant to address.

### Alternative sites

**Nature of comment | 2/10 local resident/interested party comments; 1/1 Local Councillor:**  
Query whether other sites have been considered for development and suggest brownfield sites in the vicinity.



- 5.23 **Applicant's response:** Alternative sites have been considered in Wales, England and Scotland with the application site decided upon and considered the ideal location for the company's UK headquarters. The availability of the site and lack of availability of viable alternatives at the scale required was also a factor in determining the application site. There is no in-principle policy objection with the current proposals.

### Air Quality

**Nature of comment | 1/10 local resident/interested party comments; 0/1 Local Councillor:**  
Concern regarding emissions from the proposed development.

**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**  
Note that in 2018 Welsh Government WelTAG (Welsh transport appraisal guidance) proposed closing a motorway junction that effects the m4 that is less than 100 metres from the proposed development site.

**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**  
Weltag Report noted the level of NOx to be unacceptable and requires mitigation. The rates of cancer and respiratory illness are high and unacceptable in the air quality in the area.

- 5.24 **Applicant's response:** The air quality impacts associated with the scheme have been assessed by Air Quality Consultants. The proposed development will generate additional traffic on the local road network, but the assessment has shown that there will be no significant effects at any existing, sensitive receptor. Overall, the operational air quality effects of the proposed development are judged to be 'not significant'. Further information is available in the accompanying Air Quality Assessment.

### Construction

**Nature of comment | 1/10 local resident/interested party comments; 0/1 Local Councillor:**  
Query as to which construction firm will build the factory.

**Nature of comment | 1/10 local resident/interested party comments; 0/1 Local Councillor:**  
Query the start date and duration of construction.

- 5.25 **Applicant's response:** There is no contractor appointed to deliver the scheme at this point in time. Construction firms are often appointed via a tender process once a planning application has been approved, as it is more logical to provide costs for a project once a design is fixed and not open to changes. Construction will commence once planning consent has been secured and any pre-commencement planning conditions discharged, which is hoped to be summer/early autumn 2022. The build programme is anticipated to take 18-24 months.

### Employees

**Nature of comment | 1/10 local resident/interested party comments; 0/1 Local Councillor:**  
Seek confirmation of the number of employees, specifically how many will be employed from



existing sites; how many new employees will be hired

- 5.26 **Applicant's response:** 500 existing jobs from Swansea (190), Port Talbot (170) and Llantrisant (140) will be safe guarded/re-located to the proposed factory, with approximately 150 new jobs created. Therefore, a total of 650 employees will work at the proposed factory.

### Clawdd Coch Ucha

**Nature of comment | 0/10 local resident/interested party comments; 1/1 Local Councillor:**  
Note that a historical field which formed part of the site was formerly known as Clawdd Coch Ucha.

- 5.27 **Applicant's response:** Noted.

### DCWW

- 5.28 DCWW sought to make the applicant aware of the need to engage with the Statutory Approving Body (SAB) at Neath Port Talbot County Borough to agree a Sustainable Drainage (SuDS) strategy. They reminded the applicant that if the development will give rise to a new discharge (or alter an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent is required from Dŵr Cymru / Welsh Water. Additionally, in order to establish what would be required to serve the site with an adequate water supply, DCWW stated that it will be necessary for the developer to fund the undertaking of a hydraulic modelling assessment on the water supply network.
- 5.29 **Applicant's response:** The development team has engaged the Council to seek to agree a SuDS strategy which has been developed holistically with the scheme and will be subject to a separate process of approval. The applicant is aware of the need for Discharge Consent if trade effluent will be discharged and will consider a hydraulic modelling assessment on the water supply network.

### NRW

- 5.30 NRW required additional information regarding flood risk and breeding birds to overcome concerns raised with the application. They requested that the latest Flood Map for Planning (FMfP) should be reviewed to assess the tidal flood risk and that a breeding bird survey should be scoped with the Local Authority Ecologist. Regarding land contamination NRW noted that Aquifer designations in the Terra Firma report are incorrect and raised a discrepancy in section 4.2 of the report.
- 5.31 **Applicant's response:** To address the comments relating to flood risk, the FCA has been revised to detail the updated FMfP, and the modelling has been undertaken to address tidal flood risk to the site. It indicates that there is a very low tidal flood risk to the site and is in accordance with TAN 15. Regarding land contamination, the Site Investigation Report updated to address the discrepancies noted by NRW



- 5.32 The necessity for further bird surveys have been scoped out, and instead presumes presence of a breeding bird assemblage. Mitigation is provided within the Ecological Appraisal report submitted with the planning application. This was agreed with the Local Authority.
- 5.33 It is acknowledged that habitats onsite, marshy and neutral grassland, comprises suitable vegetation for ground nesting birds such as skylark and lapwing. Indeed, a single desk study recorded for skylark was returned for the site, albeit the data was collected over ten years ago in 2011. Similarly, two records for lapwing were returned, albeit the earliest dated 2005. The applicant is also aware historically that lapwing were recorded on site pre-2005 but survey effort following that time in 2006 and 2007, undertaken on behalf of NPT, did not identify any evidence of breeding behaviour with this change in the baseline attributed to possible predation.
- 5.34 Based on surveys of the site undertaken during 2021 including phase 1, botanical, bats, invertebrate and reptiles, it is considered that suitable habitat for ground nesting species is limited by virtue of the size of the site and proximity of tall vegetation and buildings along its peripheries in addition to encroaching scrub across the site; with lapwing and skylark typically preferring to nest where field sizes are large and devoid of vertical features, such as trees, woodlands and buildings, which would otherwise attract potential predators. Establishment of a notable population of these species is likely further confounded by the relatively high levels of disturbance observed across the site, being freely accessible to members of the public and dog walkers with evidence of motorbike/quad bike use.
- 5.35 In summary, it was assessed that the site is unlikely to support a significant assemblage of either species; skylark and lapwing are unlikely to nest at the peripheries of the site due to proximity to tall vegetation with grass height becoming unfavourable as summer progresses whilst the central areas further away from such deterrents are subject to frequent disturbance. The site provides similar constraints to the establishment of notable populations of little ringed plover, whilst this species also typically prefers gravels pits, sandy banks and reservoirs for nesting.
- 5.36 As such, presence of a breeding bird assemblage more generally is presumed with greatest diversity likely associated with peripheral tree lines, albeit particularly garden-variety birds such as house sparrow, dunnoek and starling. There remains potential for ground nesting species, although the presence of significant/notable populations is unlikely, as discussed above, whilst the site also offers value as a foraging resource. Therefore, the ecologist recommends that vegetation clearance and development of the site avoids the nesting bird season or is otherwise precluded by pre-commencement checks for nesting birds including ground nesting varieties to comply with legislation.

## Cadw

- 5.37 Cadw had no comments to make on the proposed development as their records show that there are no scheduled monuments or registered historic parks and gardens that would be affected by the proposed development.
- 5.38 **Applicant's response:** Cadw's response is noted and requires no action.



### **The Coal Authority**

- 5.39 The Coal Authority confirmed that the proposed development site falls outside the Development High Risk Area therefore, there are no recorded coal mining legacy hazards at shallow depth that could pose a risk to land stability at this site. had no comments to make on the proposed development as their records show that there are no scheduled monuments or registered historic parks and gardens that would be affected by the proposed development.
- 5.40 **Applicant's response:** The Coal Authority's response is noted and requires no action.

### **Highway Authority**

- 5.41 The highway authority offered no objection and offered observations on the proposed development.
- 5.42 **Applicant's response:** The response is noted and requires no action.

### **DOCO**

- 5.43 The Designing Out Crime Officer offered standard guidance for industrial developments including that the whole site should be protected by security fencing and vehicle access onto the site should be controlled by the installation of barriers.
- 5.44 **Applicant's response:** DOCO's response is noted and guidance has been taken on board in finalising the proposal.

### **GGAT**

- 5.45 Glamorgan-Gwent Archaeological Trust had no objection and were unlikely to recommend any pre-determination archaeological work, or any archaeological conditions.
- 5.46 **Applicant's response:** GGAT's response is noted and requires no action.



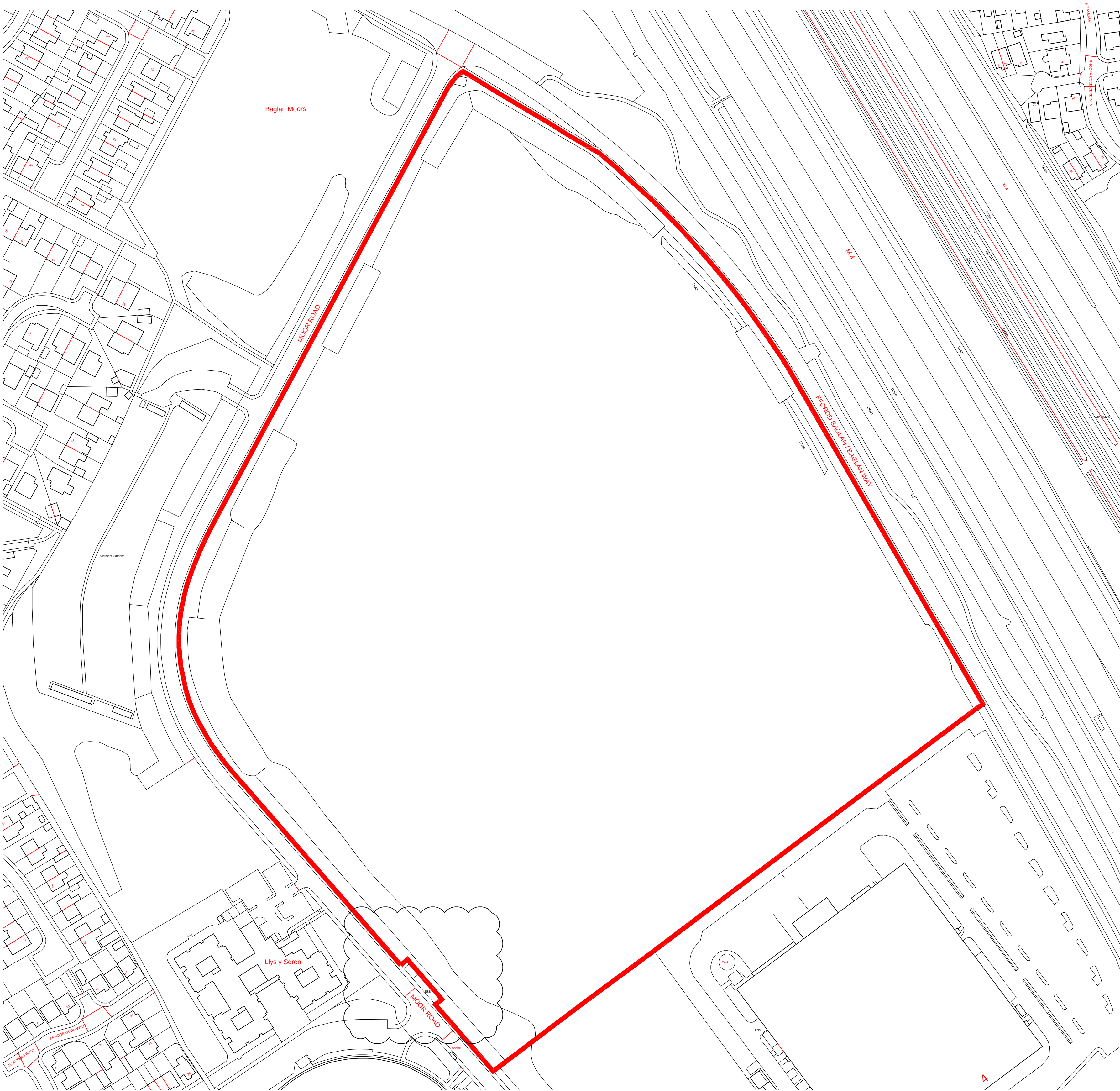
## 6 Conclusion

- 6.1 This Pre-Application Consultation Report is submitted as part of a full planning application for the development of a glass processing industrial unit (B2 use class) and associated works on land sited at the corner of Moor Road and Baglan Way, north of Baglan Industrial Park, Port Talbot. The industrial unit measures 25,545m<sup>2</sup> of floorspace including a mezzanine office measuring 1,355m<sup>2</sup>. In addition, landscaping, access, car parking, bicycle and refuse storage, sustainable drainage and associated infrastructure are proposed. This Report is a statutory requirement and addresses all matters required by article 1 of the Town and Country Planning (Development Management Procedure)(Wales)(Amendment) Order 2016.
- 6.2 It has been demonstrated herein that the applicant has undertaken all measures necessary to comply with the guidance. Changes to the proposals following PAC were assessed in the context of the scale, nature and impact of these alterations. It was concluded that post-PAC changes are entirely legitimate, provided that there is no prejudicial impact upon third parties. Given the relatively negligible increase in scale in the context of the size of the building, and the significant distance to receptors, it was concluded that the PAC process was sufficient to advertise stakeholders of the proposals and that further consultation prior to submission was not necessary. Interested parties will have a further opportunity to comment on proposals directly to the Local Authority once the application is submitted.
- 6.3 Alongside the planning application, this report demonstrates that the issues raised by the local community and specialist consultees have either been addressed as part of the application; justified in planning terms; or are not material planning considerations that require addressing.
- 6.4 The finalised proposals that form part of the planning application are therefore the result of an iterative process that has sought to engage the local community. It is also asserted that the development is entirely appropriate given its context, and for these reasons, as well as the considerations put forward in other supporting documents it is considered that Neath Port Talbot County Borough Council should recommend the approval of this planning application.

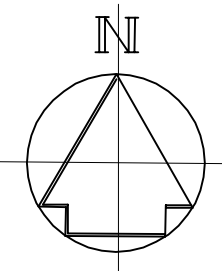
*LRM Planning*  
*May 2022*



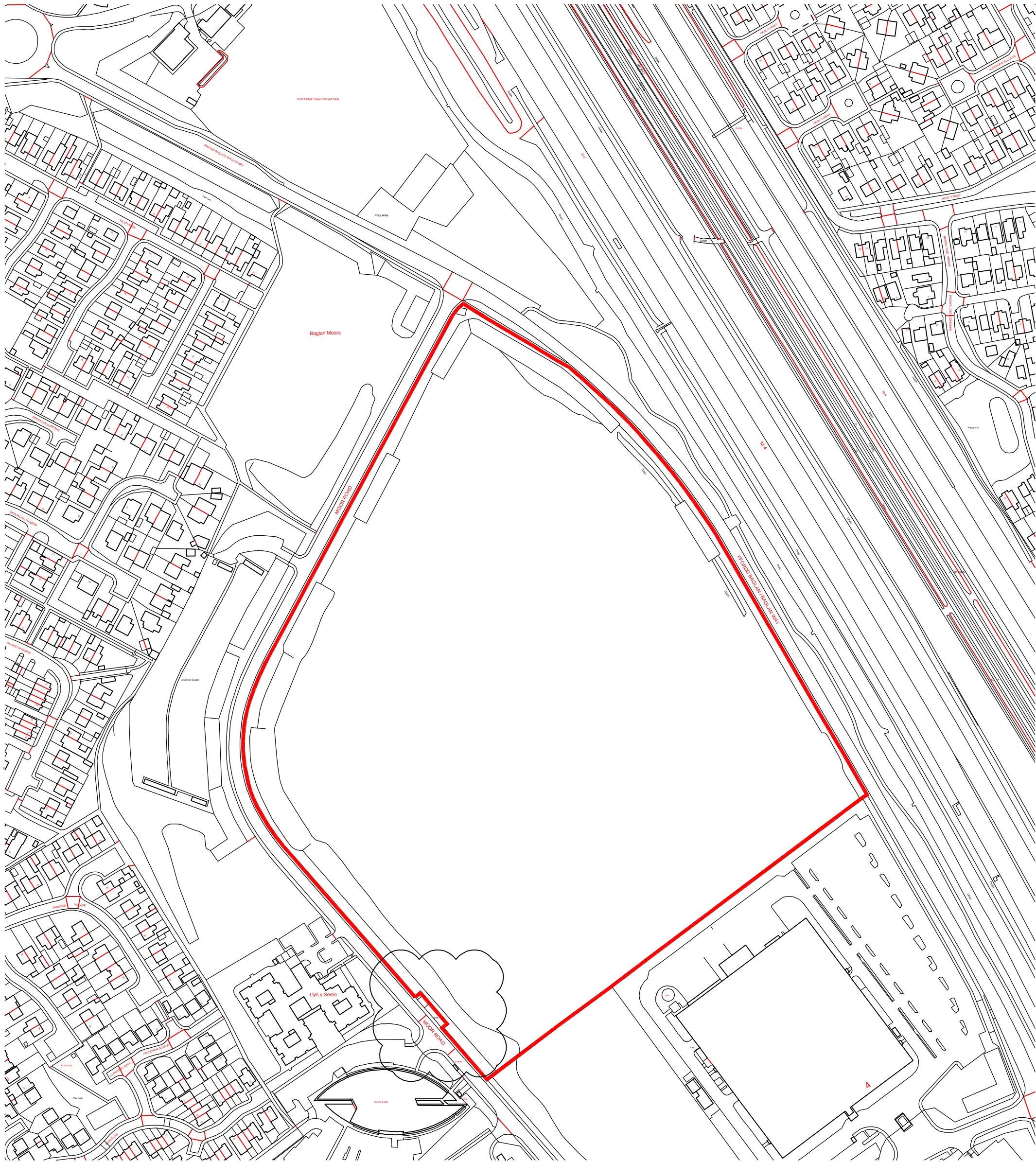
## Appendix 1 – Site Location Plan



BLOCK PLAN  
SCALE 1:1250 @ A1



LEGEND  
SITE BOUNDARY



SITE LOCATION PLAN  
SCALE 1:2500 @ A1

| Rev:  |  |  | No. REVISION |  |  | by |  |  | date       |  |  |
|-------|--|--|--------------|--|--|----|--|--|------------|--|--|
| A     |  |  | A            |  |  | AP |  |  | 18.08.2021 |  |  |
| 21.49 |  |  | A01          |  |  |    |  |  |            |  |  |
| 21.49 |  |  | A01          |  |  |    |  |  |            |  |  |
| 21.49 |  |  | A01          |  |  |    |  |  |            |  |  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| NOTES                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |  |
| 1 Do not scale from this drawing                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |  |
| 2 All dimensions to be checked on site                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |  |
| 3 'As built' drawings are prepared, in part, based upon information furnished by others. While this information is believed to be reliable, James & Nicholas LLP assume no responsibility for the accuracy of 'As built' drawings or for any errors or omissions that may have been incorporated into them as a result of incorrect information provided to us by others. Those relying on an 'As built' drawing are advised to obtain independent verification of its accuracy. |  |  |
| STAGE                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |  |
| APPROVAL                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |  |

|                              |  |  |
|------------------------------|--|--|
| REFER ALSO TO THE FOLLOWING: |  |  |
| Drawings:                    |  |  |
| Bending Schedules:           |  |  |

|                               |  |  |
|-------------------------------|--|--|
| CLIENT                        |  |  |
| CJ CONSTRUCTION (WALES) LTD   |  |  |
| GLASS SYSTEMS UK'S NUMBER ONE |  |  |

|                                                                                      |  |  |
|--------------------------------------------------------------------------------------|--|--|
| james&nicholas                                                                       |  |  |
| Grove House, Grove Place, Port Talbot SA13 1XA ð Tel 01639 885431 ð Fax 01639 891687 |  |  |
| admin@jamesandnicholas.com ð www.jamesandnicholas.com                                |  |  |
| James & Nicholas Limited Liability Partnership. Registered in the UK No. OC303071    |  |  |
| Job title                                                                            |  |  |
| NEW PRODUCTION UNIT, BAGLAN INDUSTRIAL PARK, PORT TALBOT, CJ CONSTRUCTION            |  |  |
| Drawing title                                                                        |  |  |
| SITE LOCATION AND BLOCK PLAN                                                         |  |  |
| by                                                                                   |  |  |
| date                                                                                 |  |  |
| drawn                                                                                |  |  |
| checked                                                                              |  |  |
| approved                                                                             |  |  |
| Job No:                                                                              |  |  |
| Drawing No:                                                                          |  |  |
| Rev:                                                                                 |  |  |
| 21.49                                                                                |  |  |
| A01                                                                                  |  |  |
| A                                                                                    |  |  |
| 1:1250, 1:2500 @ A1                                                                  |  |  |



## Appendix 2 –Notice displayed on site and issued to interested parties

## **PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE**

### **Town and Country Planning (Development Management Procedure) (Wales) Order 2012**

**Purpose of this notice:** This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the Local Planning Authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

**Proposed development at:** Land at Baglan Way, Port Talbot.

**I give notice that:** Glass Systems Limited

**Is intending to apply for planning permission for:** Full planning consent for the development of an industrial unit and associated works including sustainable drainage, car parking, landscaping and other associated works.

**You may inspect copies of:**

- The proposed application;
- The plans; and
- Other supporting documents.

**Online at:** <http://lrmplanning.com/public-consultation/>

**Computer facilities are available to view this information online at:** Baglan Library, 2 Willow Grove, Baglan, Port Talbot, SA12 8NY which is open: Monday (10:00-12:30, 14:00-18:00); Tuesday (13:30-18:00); Thursday (10:00-12:30, 14:00-18:00); Friday (13:30-18:00); and Saturday (9.30-13.30); and closed Wednesday and Sunday.

**Anyone who wishes to make representations about this proposed development must write to the applicant/agent at:**

**Email:** [admin@lrmplanning.com](mailto:admin@lrmplanning.com)

**Address:** LRM Planning, 22 Cathedral Road, Cardiff, CF11 9LJ

**All responses must be received by:** Friday 4<sup>th</sup> March 2022

## CYHOEDDUSRWYDD AC YMGYNHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO

### Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

**Diben yr hysbysiad hwn:** Mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau yn uniongyrchol i'r datblygwr ynglŷn â datblygiad arfaethedig cyn cyflwyno cais am ganiatâd cynllunio i'r Awdurdod Cynllunio Lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir gennych wrth ymateb i'r hysbysiad hwn yn lleihau dim ar eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir gennych yn y ffeil gyhoeddus.

**Datblygiad Arfaethedig yn:** Tir ger Ffordd Baglan, Port Talbot

**Rwyf yn hysbysu bod:** Glass Systems Limited

**Yn bwriadu gwneud cais am ganiatâd cynllunio er mwyn:** Caniatâd cynllunio llawn i adeiladu uned diwydiannol a gwaith cysylltiedig gan gynnwys draenio cynaliadwy, parcio, tirweddu, a gwaith cysylltiedig.

#### Gellwch archwilio copïau o'r canlynol:

- y cais arfaethedig;
- y planiau; a
- dogfennau ategol eraill

**Ar-lein yn:** <http://lrmplanning.com/public-consultation/>

**Mae cyfleusterau cyfrifiadur ar gael i archwilio'r wybodaeth hon ar lein yn:** Llyfrgell Baglan, Willow Grove, Baglan, Port Talbot, SA12 8NY sydd ar agor: Dydd Llun (10:00-12:30, 14:00-18:00); Dydd Mawrth (13:30-18:00); Dydd Iau (10:00-12:30, 14:00-18:00); Dydd Gwener (13:30-18:00); a Dydd Sadwrn (9.30-13.30); ac ar gau ar Ddydd Mercher a Ddydd Sul.

**Mae'n rhaid i unrhyw un sy'n dymuno gwneud sylwadau ynglun â'r datblygiad arfaethedig hwn ysgrifennu at y ceisydd/yr asiant yn:**

**Cyfeiriad e-bost:** [admin@lrmplanning.com](mailto:admin@lrmplanning.com)

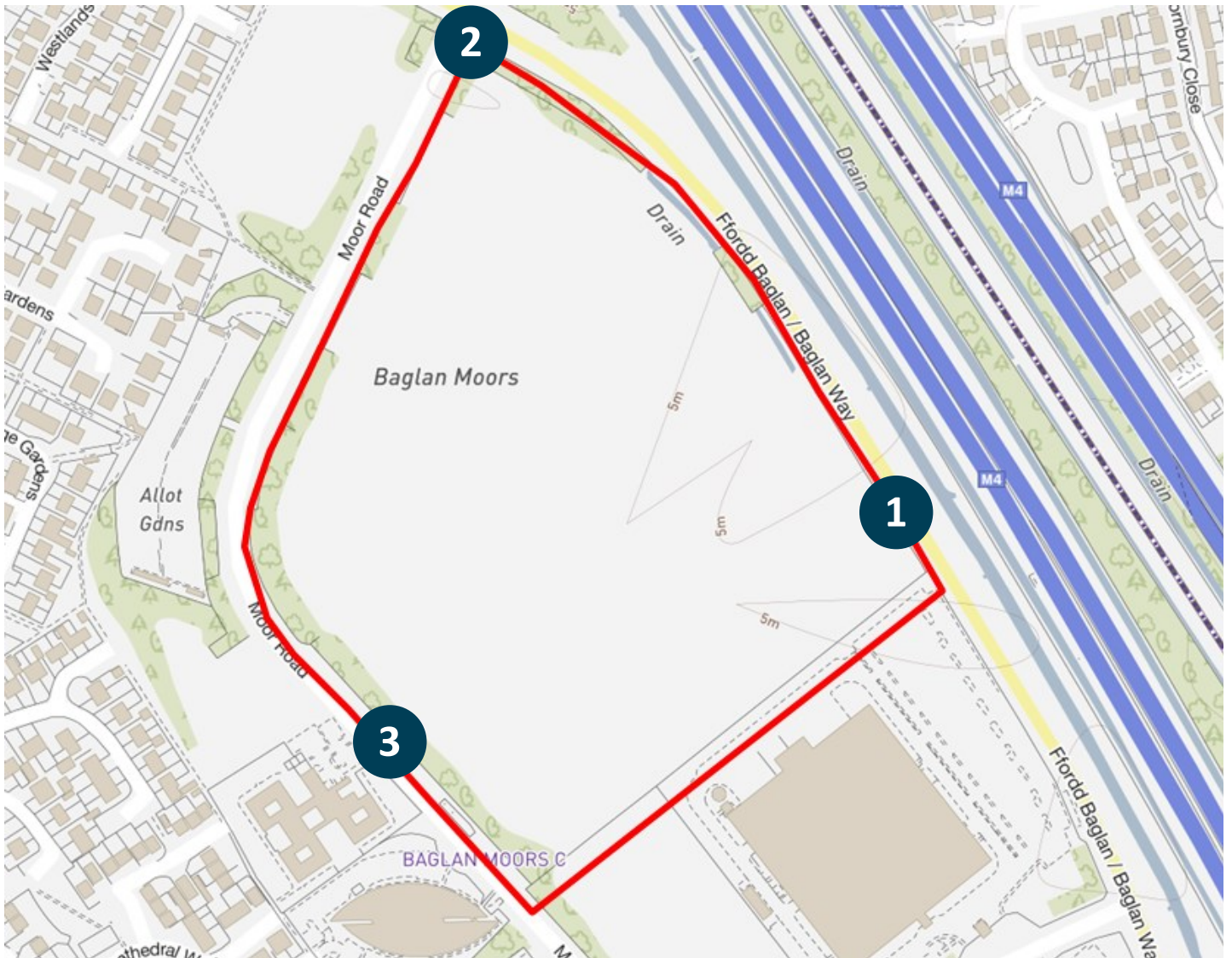
**Cyfeiriad:** LRM Planning, 22 Heol y Gadeirlan, Caerdydd, CF11 9LJ

**Rhaid anfon ymateb i ddod i law erbyn:** Dydd Gwener 4ydd Mawrth 2022

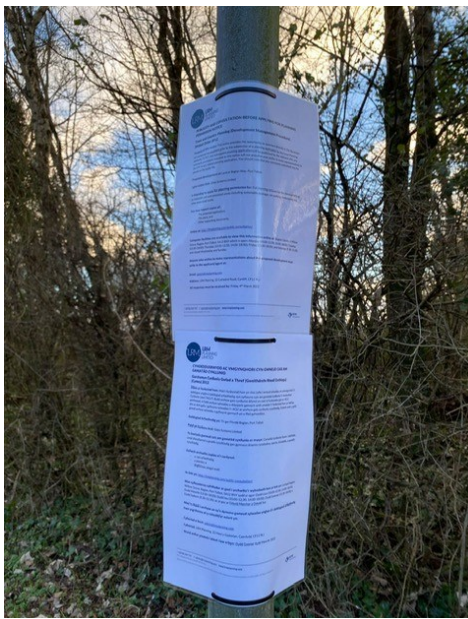


## Appendix 3 – Photographs and aerial map of locations for display of Site Notices

## Photographs and aerial map of locations for display of Site Notices



1. Entrance off Moor Road



2. Northern corner



3. Moor Road



## Appendix 4 – Declaration of display of Site Notice

## DECLARATION OF DISPLAY OF SITE NOTICE

### Town and Country Planning (Development Management Procedure) (Wales) Order 2012

|                                                                                        |                                                                                                                                                  |
|----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>I give notice that:</b>                                                             | LRM Planning Ltd.                                                                                                                                |
| <b>On behalf of:</b>                                                                   | Glass Systems Limited.                                                                                                                           |
| <b>Has correctly displayed bilingual site notices on site at:</b>                      | Land at Baglan Way, Port Talbot                                                                                                                  |
| <b>Advising interested parties of the intention to develop the site in respect of:</b> | Full development of an industrial unit and associated works including sustainable drainage, car parking, landscaping and other associated works. |
| <b>On:</b>                                                                             | Friday 4 <sup>th</sup> February 2022                                                                                                             |
| <b>For a period of:</b>                                                                | No less than 28 days                                                                                                                             |
| <b>Declaration made by:</b>                                                            | Rhys Jones, Planner, LRM Planning                                                                                                                |

For more details, including number of site notices and location of displayed site notices, please see accompanying Pre-Application Consultation Report.



## Appendix 5 – Copy of letter issued to local owners and occupiers



Date: 4<sup>th</sup> February 2022  
Our Ref: SH/21.177

Owner or Occupier

Dear Sir or Madam,

**Publicity and Consultation Before Applying for Planning Permission Notice Under Articles 2C and 2D as Modified by Article 2G  
Town and Country Planning (Development Management Procedure) (Wales) Order 2012  
Proposed development of an industrial unit and associated works including sustainable drainage, car parking, landscaping and other associated works on land at Baglan Way, Port Talbot.**

LRM Planning is acting as planning agent to Glass Systems Limited. in respect of the proposed development outlined above. We are writing to you as a near neighbour of the site to provide the enclosed notice, which gives you the opportunity to comment directly to the applicant, prior to the formal planning application being made to the Local Authority.

The draft planning application, including full set of drawings, can be viewed by visiting <http://lrmp planning.com/public-consultation/> and then the link for 'Land at Baglan Way, Port Talbot'. Alternatively, visit the LRM homepage ([www.lrmplanning.com](http://www.lrmplanning.com)) and click on 'Public Consultations', via the menu in the top left-hand corner of the screen. Should you wish to comment, please contact LRM Planning via the email or postal addresses provided below, or the feedback form on the website.

Following the consultation period of 28 days, the comments received will be reviewed, considered and responded to, in the form of a Pre-Application Consultation Report that will accompany the planning application. The planning application will be submitted to Neath Port Talbot County Council for consideration soon thereafter. The deadline for comments on this application is Friday 4<sup>th</sup> March 2022. ***You will have an opportunity to comment directly to the Local Authority once the application is submitted.***

Yours faithfully,

**LRM Planning Ltd**

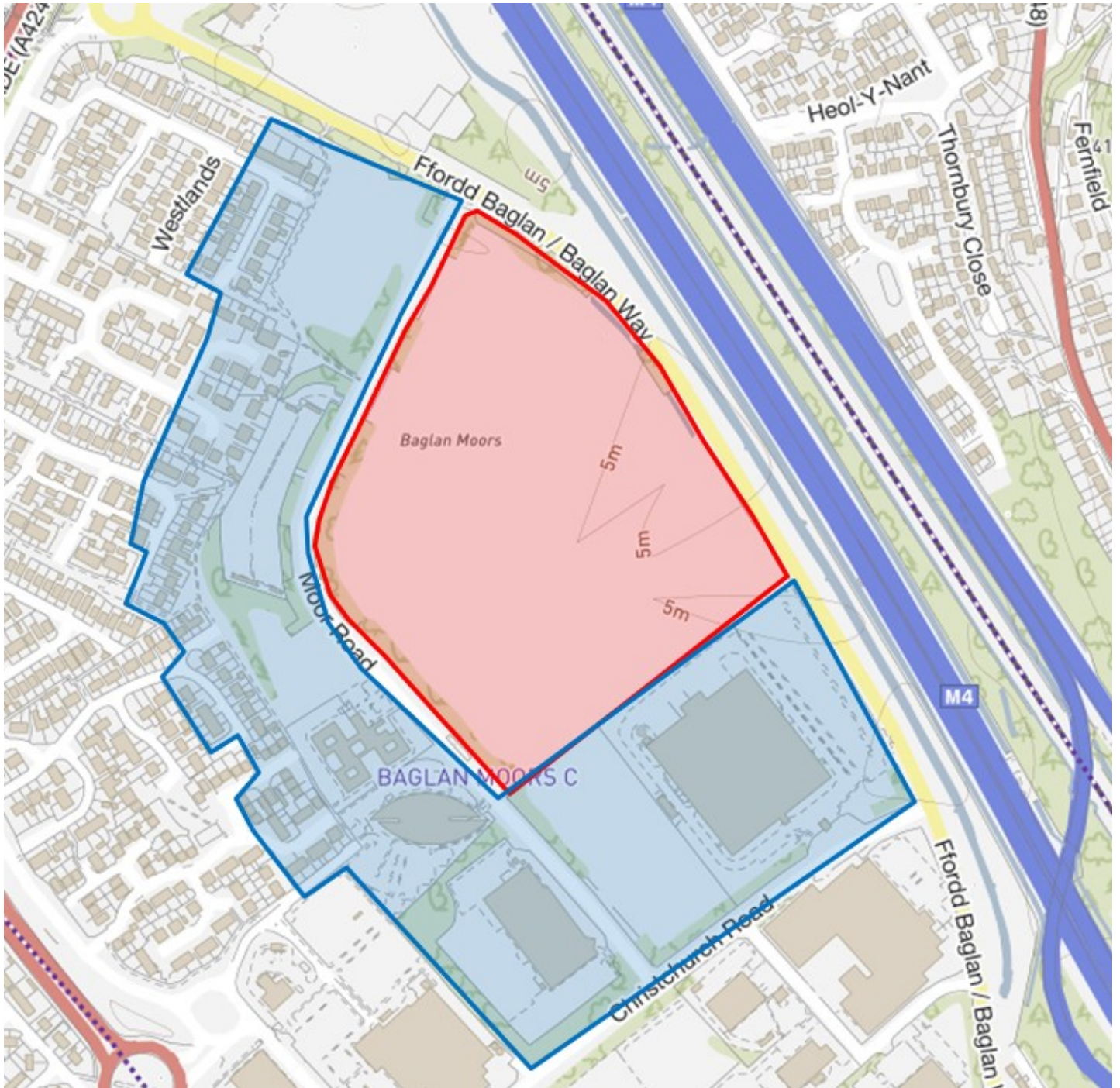
*Os hoffwch fersiwn Cymraeg o'r lythr hon, cysylltwch ag  
LRM Planning, os gwelwch yn dda*

*Should you require a Welsh language version of this letter,  
please contact LRM Planning*



## Appendix 6 – Map of surrounding streets showing extent of letter drop

Map of surrounding streets showing extent of letter drop





## Appendix 7 – Copy of correspondence issued to Councillors

**From:** [Steffan Harries](#)  
**To:** ["cllr.s.bamsey@npt.gov.uk"; "cllr.n.t.hunt@npt.gov.uk"; "cllr.s.lynch@npt.gov.uk"](#)  
**Bcc:** [Alex Holland \(alexholland@cj-construction.co.uk\); Rhys Jones](#)  
**Subject:** Pre-Application Consultation - proposed glass processing facility at Baglan Way, Port Talbot  
**Date:** 04 February 2022 14:19:49  
**Attachments:** [image001.jpg](#)  
[220204 Pre-Application Consultation Notice.pdf](#)

---

Dear Councillors,

I am contacting you as part of the mandatory Pre-Application Consultation (PAC) exercise on planning applications for major development. This notice comprises a formal invitation to provide Pre-Application Consultation comments.

This relates to a planning application for the development of an industrial unit for the processing of glass, and associated works including sustainable drainage, car parking, landscaping and other associated works on land at Baglan Way, Port Talbot.

For transparency, this email is addressed to the following persons:

- **Councillors Scott Bamsey, Nigel Thomas Hunt and Stephanie Lynch** as ward councillors for Aberavon, the Ward in which the site lies.

The formal notice attached provides information about the proposals, and gives details on how to view the draft planning application, which is now available for viewing on our website at [www.lrmplanning.com](http://www.lrmplanning.com), and includes drawings, draft planning application forms and draft Design & Access Statement, along with other supporting documents.

To access this information, please follow the menu on the blue bar on the left-hand side of the webpage, click on 'Public Consultation', and then on '*Land at Baglan Way, Port Talbot.*'

The formal consultation begins today, Friday 4<sup>th</sup> February and runs for 28 days until Friday 4<sup>th</sup> March 2022. In accordance with the requirements of article 2E of the Order, any response you wish to make must be received by this date.

Our advertisement of this development to neighbours is via display of site notice(s) and letter drop. The letter drop extends to the properties immediately adjoining and facing the development site and a number of properties in the surrounding area. You are of course more than welcome to inform residents beyond the immediate confines of the site, as you deem appropriate, who may also submit comments via the same means.

In addition, should you find it useful to discuss with members of the development team to discuss the proposals, please either email back or call on either of the below numbers, and we will seek to find a mutually convenient date.

If you have any queries, please do not hesitate to contact me on the details provided below.

Kind regards,

**Steffan Harries** Director  
BSc (Hons) MA(UD) MRTPI

t: 02920 349737 m: 07500 931546  
website: [lrmplanning.com](http://lrmplanning.com)  
twitter: [@lrmplanning](https://twitter.com/lrmplanning)

[LRM Planning Covid-19 Statement](#)

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ

Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ



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## Appendix 8 – Copy of correspondence issued to specialist consultees

**From:** [Steffan Harries](#)  
**To:** ["HDC@npt.gov.uk"](#); ["NDCPlanning.Planning@dwrcymru.com"](#); ["planningconsultation@coal.gov.uk"](#); ["Cadwplanning@gov.wales"](#); ["swplanning@cyfoethnaturiolcymru.gov.uk"](#); ["Bregs@mawwfire.gov.uk"](#)  
**Cc:** ["plantprotection@cadentgas.com"](#); ["wpdnewsupplieswales@westernpower.co.uk"](#); ["enquiries@wvutilities.co.uk"](#); ["planning@ggat.org.uk"](#); ["Michael.Harvey2@south-wales.pnn.police.uk"](#); ["l.palmer@npt.gov.uk"](#); ["r.sharp@npt.gov.uk"](#); ["kathryn@kewplanning.co.uk"](#); [Nathan Goldup-John](#)  
**Bcc:** [Alex Holland \(alexholland@cj-construction.co.uk\)](#); [Rhys Jones](#)  
**Subject:** Pre-Application Consultation - proposed glass processing facility at Baglan Way, Port Talbot  
**Date:** 04 February 2022 14:19:58  
**Attachments:** [image001.jpg](#)  
[220204 Pre-Application Consultation Notice.pdf](#)

---

Dear Sir/Madam,

I am writing to you as a specialist consultee or adjoining landowner as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, to serve the attached notice. This notice comprises a formal request for Pre-Application Consultation comments under article 2D of the Order as Modified by Article 2G.

This relates to a planning application for the development of an industrial unit for the processing of glass, and associated works including sustainable drainage, car parking, landscaping and other associated works on land at Baglan Way, Port Talbot.

For transparency, this email is addressed to the following bodies/persons in accordance with the requirements listed in the table under schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016:

- **Neath Port Talbot Council Highways Authority** – as the development is likely to result in a material increase in the volume of traffic entering or leaving a classified road; the development involves the formation or alteration of a means of access to a highway; and as an adjoining landowner.
- **Dŵr Cymru Welsh Water** – as the water and sewerage undertaker concerned and the development involves new industrial development.
- **The Coal Authority** – as the development lies within an area which has been notified for the purpose of this provision to the local planning authority by the Coal Authority because of the presence of land instability risks from coal mining.
- **Cadw** – as the development measures over a hectare and is within a distance of 3 kilometres from the perimeter of a scheduled monument, in the form of Ruins of St Baglan's Church (0.75km north-east), Plas Baglan (0.90km north-east), Craig Ty Isaf Camp (1.8km north-east), Cwm Clais Castle Mound (1.9km east), Briton Ferry Dock Entrance (2.2km north-west), Buarth y Gaer (2.4km north-east), and Mynydd y Gaer (2.9km north-east).
- **Natural Resources Wales** – The development is within 250 metres of land which has, at any time in the 30 years been used for the deposit of refuse or waste; and is designated as Flood Zone C1.
- **Fire and Rescue Authorities** – as the floor space to be created by the development is 1,000 square metres or more; and development carried out on a site having an area of 1 hectare or more.

The email is also addressed to the following non-statutory bodies voluntarily to provide an opportunity to comment on the proposed development prior to submission.

- **National Grid;**
- **Western Power;**
- **Wales and West Utilities;**
- **Glamorgan Gwent Archaeological Trust;**
- **Designing Out Crime Officer (South Wales Police);**

**Neath Port Talbot Biodiversity Officer; and**  
• **Neath Port Talbot Case Officer.**

The formal notice attached provides information about the proposals and gives details on how to view the draft planning application, which is now available for viewing on our website at [www.lrmplanning.com](http://www.lrmplanning.com), and includes drawings, draft planning application forms and draft Design & Access Statement, along with other supporting documents.

To access this information, please follow the menu on the blue bar on the left-hand side of the webpage, click on 'Public Consultation', and then on '*Land at Baglan Way, Port Talbot*'.

The formal consultation begins today, Friday 4<sup>th</sup> February and runs for 28 days until Friday 4<sup>th</sup> March In accordance with the requirements of article 2E of the Order, any response you wish to make must be received by this date.

If you have any queries, please do not hesitate to contact me on the details provided below.

Kind regards,

**Steffan Harries** Director  
BSc (Hons) MA(UD) MRTPI

t: 02920 349737 m: 07500 931546

website: [lrmplanning.com](http://lrmplanning.com)

twitter: [@lrmplanning](https://twitter.com/lrmplanning)

[LRM Planning Covid-19 Statement](#)

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ

Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ



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## Appendix 9 – Response from Local Councillor

**From:** [Cllr. Stephanie Lynch](#)  
**To:** [Steffan Harries](#)  
**Subject:** Re: Pre-Application Consultation - proposed glass processing facility at Baglan Way, Port Talbot  
**Date:** 16 February 2022 10:14:32  
**Attachments:** [image001.jpg](#)

---

Hi Steffan,  
We have quite a few questions from residents which to be honest I am struggling to answer! Would you consider an online meeting to answer questions that they have?  
Kind regards,  
Stephanie

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---

**From:** Steffan Harries <steffanharries@lrmp planning.com>  
**Sent:** Friday, February 4, 2022 2:19:51 PM  
**To:** Cllr. Scott Bamsey <c llr.s.bamsey@npt.gov.uk>; Cllr. Nigel Thomas Hunt <c llr.n.t.hunt@npt.gov.uk>; Cllr. Stephanie Lynch <c llr.s.lynch@npt.gov.uk>  
**Subject:** Pre-Application Consultation - proposed glass processing facility at Baglan Way, Port Talbot

Dear Councillors,

I am contacting you as part of the mandatory Pre-Application Consultation (PAC) exercise on planning applications for major development. This notice comprises a formal invitation to provide Pre-Application Consultation comments.

This relates to a planning application for the development of an industrial unit for the processing of glass, and associated works including sustainable drainage, car parking, landscaping and other associated works on land at Baglan Way, Port Talbot.

For transparency, this email is addressed to the following persons:

- **Councillors Scott Bamsey, Nigel Thomas Hunt and Stephanie Lynch** as ward councillors for Aberavon, the Ward in which the site lies.

The formal notice attached provides information about the proposals, and gives details on how to view the draft planning application, which is now available for viewing on our website at [www.lrmplanning.com](http://www.lrmplanning.com), and includes drawings, draft planning application forms and draft Design & Access Statement, along with other supporting documents.

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The formal consultation begins today, Friday 4<sup>th</sup> February and runs for 28 days until Friday 4<sup>th</sup> March 2022. In accordance with the requirements of article 2E of the Order, any response you wish to make must be received by this date.

Our advertisement of this development to neighbours is via display of site notice(s) and letter drop. The letter drop extends to the properties immediately adjoining and facing the development site and a number of properties in the surrounding area. You are of course more

than welcome to inform residents beyond the immediate confines of the site, as you deem appropriate, who may also submit comments via the same means.

In addition, should you find it useful to discuss with members of the development team to discuss the proposals, please either email back or call on either of the below numbers, and we will seek to find a mutually convenient date.

If you have any queries, please do not hesitate to contact me on the details provided below.

Kind regards,

**Steffan Harries** Director  
BSc (Hons) MA(UD) MRTPI

t: 02920 349737 m: 07500 931546

website: [lrmp planning.com](http://lrmp planning.com)

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Click [here](#) to report this email as spam.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni

If you would like to use Welsh when dealing with the Council please click [here](#)

Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch [yma](#)

This message has been scanned for malware by Forcepoint. [www.forcepoint.com](http://www.forcepoint.com)

**From:** [Cllr. Nigel Thomas Hunt](#)  
**To:** [LRM Planning](#)  
**Subject:** Proposed development at Baglan Way, Port Talbot  
**Date:** 03 March 2022 22:11:09

---

Dear Sir/Madam,

I write to you today about the proposed planning development by Glass Systems limited on land at Baglan Way formerly known as Clawdd Coch Ucha (The High Red Flood Bank) on Baglan Moors.

I am a Local elected member for the said area on Neath Port Talbot County Borough Council.

I have several reservations about this proposed project.

Bio diversity, flooding, noise, air quality.

This land has SINC Status. I have read an informal report by a leading figure in south west Wales Charles Hipkin that describes it as an oasis of bio diversity in an extensively urbanized ward of Aberafan & Baglan Moors. It is the only significant area left of bio diversity and green space in the ward. It has potential to become a nature reserve and improve the wellbeing of those that live, work, learn and play in this area. To be designated SINC status an area needs to meet certain criteria – it has to have at least one primary/priority species and or at least five Contributory species – Clawdd Coch Ucha has three Primary species and nine contributory species. It is so diverse over 200 vascular plant species have been recorded and listed here. This is probably due to it never having been grazed on or tarnished by pesticides. It truly is a special piece of land. Any development that loses this land SINC status should form equivalent mitigation.

Other features of this site include RSPB Red Listed Birds that have been recorded here – Lapwing, Common Linnet, Starling, Bullfinch, Cetti Warbler, Reed Bunting and Snipe. Other species that have high conservation status that have been recorded on the site include the shrill carder bee, the brown banded carder bee, the assassin bug and the Five Spot Burnet Moth. In 2020 school children from St Joseph's Primary School chose to complete a mural about the bio Diversity of Clawdd Coch Ucha in an Aberafan Subway and included a lapwing, bullfinch, shrill carder bee and the Assassin Bug in their art. To see this place being developed would be heart breaking.

The Bio Diversity of this land must be considered and mitigated by any development.

This area was classed as a C2 Floodplain by NRW until March 2017. In fact it was a C2 floodplain until a week before a prison proposal was put forward by Welsh Government and the Ministry of Justice for the same land. I observe that some of your calculations are around C1 and not C2 floodplain.

During this PAC a flood warning was sent to this very area by NRW during storm Eunice – many neighbouring areas did not. Why was this?

This part of Baglan Industrial Estate is closest to residents.

As recently as 2020 we had a flash flood in Pentre Afan. There is subsidence in many houses in Brooklyn Gardens and Village Gardens. We have sodden gardens throughout the Moors. By concreting over hundreds of metres of green land which has soaked away water forever – where is that water going to go?

In extreme weather will the ponds you propose to landscape into then site hold up?

Will the Baglan Brook be able to take the extra water, and what happens if the Seaway Parade

pumping station fails?

The question of exceedance in the report does not have anywhere near enough detail to convince me that the question of flood risk is answered?

And of course who is going to make good on any harm caused by over development and flooding to the residential community?

Will it be the developer or the Glass Factory?

Or will it fall upon the NPTCBC and the Taxpayer?

Or the residents whom object to this development?

Who is going to take responsibility for this risk of exceedence?

Furthermore the Air Quality in Port Talbot is well documented – in 2018 a Welsh Government Weltag Report proposed closing a motorway junction that effects the m4 that is less than 100 metres from this development. This stretch of M4 was also closed as was the mainline railway line close to the proposed site during storm Eunice. The Weltag Report said that the level of NOx was unacceptable and we are to mitigate against this. Developing a green lung for the area is going against this and would have an adverse effect on all businesses on Baglan Way if junction41 was ever to close.

The rates of cancer and respiratory illness are already way to high and unacceptable in this area and air quality will not be improved by this development.

The residents of Baglan Moors are all living in close proximity to this land. The noise levels from a 24 hour glass factory is going to affect their wellbeing.

I cannot see any benefit for this already built up area.

Furthermore, the experience of The Glass Factory on Aberafan Road has not seen them as the best of neighbours. The litter and smashed glass is a perpetual nuisance for our street care teams.

Finally the volume of traffic in the area is already very high. At times its bottlenecked. The extra traffic is going to add to an at times already saturated road system.

Has the glass factory considered land on Baglan Energy Park, Kenfig Industrial Estate , or any other such industrial estate that is away from residents houses and not granted sink status?

I am sure there are far more appropriate industrial brown field sites where this development would be welcomed and I implore you to look elsewhere?

Yours

Councillor Nigel Thomas Hunt

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni

If you would like to use Welsh when dealing with the Council please click [here](#)

Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch [yma](#)

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## Appendix 10 – Responses from Dŵr Cymru Welsh Water, Natural Resources Wales, Cadw, The Coal Authority, Highways Authority, Glamorgan-Gwent Archaeological Trust and Designing Out Crime Officer

LRM Planning Limited  
22 Cathedral Road,  
Cardiff  
CF11 9LJ

**Date: 25/02/2022**  
**Our Ref: PPA0006439**

Dear Sir/Madam,

**Grid Ref: 274887 191508**

**Site Address: Land at Baglan Way, Port Talbot**

**Development: 2D - Full Planning consent for the development of an industrial unit and associated works.**

We refer to the Schedule 1C - Article 2D notice received and your formal request for a pre-application consultation response before applying for planning permission from Dwr Cymru Welsh Water as a 'Specialist Consultee' as defined by Paragraph (y) of Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. It is acknowledged that the consultation request relates to a major development site and thus seeks a substantive response within 28 days from the date of the notice, as per the requirements of Article 2E. This request includes our views on the capacity of our network of assets and infrastructure to accommodate your proposed development.

Having reviewed the details submitted I would advise there is no objection in principle to the proposed development and offer the following standing advice which should be taken into account within any future planning application for the development:

### **SEWERAGE**

Firstly, we have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. Notwithstanding this, if the development will give rise to a new discharge (or alter an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Dwr Cymru / Welsh Water. Please note that the issuing of a Discharge Consent is independent of the planning process and a consent may be refused although planning permission is granted.

Turning to surface water drainage, as of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'.

In this instance, we acknowledge receipt of a 'Drainage Strategy' which indicates proposals to dispose surface water flows to an adjacent surface water body and in principle offer no objection subject to applicants' consultation with Neath Port Talbot County Borough Council, as the determining SuDS Approval Body (SAB) and Lead Local Flood Authority, in relation to their proposals for SuDS features.

Please note, Dwr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation; for completeness, no amount of surface water flows will be permitted to connect to the public sewerage system. In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of [www.dwrcymru.com](http://www.dwrcymru.com).

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

## **SEWAGE TREATMENT**

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

## **WATER SUPPLY**

In order to establish what would be required to serve the site with an adequate water supply, it will be necessary for the developer to fund the undertaking of a hydraulic modelling assessment on the water supply network. For the developer to obtain a quotation for the hydraulic modelling assessment, we will require a fee of £250 + VAT.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.  
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in  
Welsh and English

Dŵr Cymru Cyf, a limited company registered in  
Wales no 2366777. Registered office: Pentwyn Road,  
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y  
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng  
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn  
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com)

Please quote our reference number in all communications and correspondence.

Yours faithfully,



**Owain George**  
**Planning Liaison Manager**  
**Developer Services**

***Please Note that demands upon the water and sewerage systems change continually; consequently, the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.***

Steffan Harries,  
LRM Planning,  
22 Cathedral Road,  
Cardiff,  
CF11 9LJ

3 March 2022

Annwyl Syr / Dear Sir,

**STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING  
(DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.**

**BWRIAD / PROPOSAL:** Development of an industrial unit and associated works including sustainable drainage, car parking, landscaping and other associated works.

**LLEOLIAD / LOCATION:** Baglan Way, Baglan Industrial Park, Port Talbot, SA12 7BY

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 4 February 2022.

**We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding flood risk and breeding birds. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.**

Flood Risk

The planning application proposes less vulnerable development (industrial). Our Flood Risk Map confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in TAN15 and the Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and falls into Flood Zone 3 Rivers and Sea.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate through the submission of an FCA that the potential consequences of flooding can be managed to an acceptable level.

We have reviewed the FCA undertaken by JBA, dated August 2021 reference BF-JBAU-XX-XX-RP-Z-0001-D3-P01-Baglan\_Way\_Industrial\_Unit\_FCA. Our advice to you is that the FCA fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level for the reasons explained below:

The use of Flood Risk Assessment Wales (FRAW) data as quoted in section 4, is not considered appropriate to inform the findings of an FCA and cannot be used to discount tidal flood risk. The latest flood risk information available (FMfP Map) shows there to be a tidal flood risk to the application site and the FCA should be revised to assess the 0.5%, 0.5%+CC over Lifetime of Development (LOD), 0.1% and 0.1%+CC LOD

We acknowledge that the site is shown to comply with the requirements of TAN15's Tables A1.14 and A1.15 in the fluvial flood scenario's and we would highlight that Moor Road and Baglan Way is shown to be at risk of flooding and the Local Authority will need to assess if the access and egress can be acceptably managed.

If no further information is submitted, or a revised FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we object to this application.

As it is for the local authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, they will need to consult other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

#### Ecology and Breeding Birds

We are aware of several records of Lapwing at the site and in the surrounding area. The ecological report prepared by The Environmental Dimension Partnership Ltd, January 2022 (edp7017\_r006a) has scoped out breeding surveys, including ground nesting species such as Lapwing and Skylark. Lapwing are on the UK Schedule 1 Bird List, and are also listed under Section 7 of the Environment (Wales) Act, 2016, as a Species of Principal Importance in Wales, therefore breeding bird surveys should be carried in support of the application. We recommend you contact the Local Authority Ecologist to discuss the scope of these surveys.

The site forms part of the Panasonic Site of Importance for Nature Conservation (SINC), as this site is of local importance we defer to the Local Authority Ecologists for comment.

#### Land Contamination

Natural Resources Wales considers that the controlled waters at this site are not of the highest environmental sensitivity, therefore we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

It is recommended that the requirements of Planning Policy Wales and the [Guiding Principles for Land Contamination \(GPLC\)](#) should be followed.

These comments are based on our assumption that **gross contamination** is not present at this location. If, during development, gross contamination is found to be present at the site the Local Planning Authority may wish to re-consult Natural Resources Wales.

We have reviewed the report prepared by Terr Firma, Geotechnical and Geoenvironmental Report, Baglan Way, August 2021, Job No: 16750. We note the Aquifer designations are incorrect, the superficial deposits are Secondary B and the bedrock Secondary A.

In section 4.2 although there are no previous industrial uses on the site and the former BP Chemical works is 900m away, one of the sources has been listed as Isopropanol in the groundwater. However, this is not present in the groundwater samples that have been supplied.

We draw Terra Firma attention to the relevant documents [Natural Resources Wales / Land contamination](#)

## **Other Matters**

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

**Rhian Isaac**

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning  
Cyfoeth Naturiol Cymru / Natural Resources Wales

LRM Planning Limited

By email: [admin@lrmpanning.com](mailto:admin@lrmpanning.com)Eich cyfeirnod  
Your referenceEin cyfeirnod  
Our referenceDyddiad  
DateLlinell uniongyrchol  
Direct lineEbost  
Email:

LC

22 February 2022

0300 0256004

[cadwplanning@gov.wales](mailto:cadwplanning@gov.wales)

Dear Sir/Madam

**Pre-Planning Application - Full planning consent for the development of an industrial unit and associated works including sustainable drainage, car parking, landscaping and other associated works, Land at Baglan Way, Port Talbot**

Thank you for your letter of 4 February inviting our comments on the pre-planning application consultation for the proposed development described above.

**Advice**

The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final planning application. Our assessment of the pre-application is given below.

Our records show that there are no scheduled monuments or registered historic parks and gardens that would be affected by the proposed development.

We therefore have no comments to make on the proposed development.

The national policy and Cadw's role in the planning process are set out in Annex A.

**Assessment**

This planning application is for an Industrial Unit and works at Land at Baglan Way, Newport.

Located within a 3km buffer of the application area are:

**Scheduled Monuments**

GM054 Buarth y Gaer, Mynydd y Gaer  
GM055 Mynydd y Gaer (Lower) Camp



GM263 Craig Ty-Isaf Camp  
GM289 Cwm-Clais Castle Mound  
GM358 Plas Baglan  
GM428 Ruins of St Baglan's Church  
GM445 Briton Ferry Dock Entrance

Registered Park and Garden

PGW(Gm)62(NEP) Jersey Park

Intervening topography, buildings and vegetation mean it is unlikely that the proposal will be inter-visible with the scheduled monuments or the registered park and garden. Therefore it is unlikely that there will be any effect on the settings of the scheduled monuments or the registered park and garden.

Finally, there may also be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by the Glamorgan-Gwent Archaeological Trust [www.ggat.org.uk](http://www.ggat.org.uk)

Yours sincerely,

Laura Cooper  
Policy and Protection

## **Annex A**

### Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

### National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW [planning-policy-wales-edition-11.pdf](#) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

### Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the



determination of a planning application.



**The Coal  
Authority**

Resolving the **impacts** of mining

200 Lichfield Lane  
Mansfield  
Nottinghamshire  
NG18 4RG  
T: 01623 637 119

E: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)  
[www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

For the attention of Steffan Harries - Director  
LRM Planning Limited

**[By email: [admin@lrmplanning.com](mailto:admin@lrmplanning.com)]**

09 February 2022

Dear Mr Harries

**Schedule 1C Article 2D - Consultation before applying for planning permission**

**Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020**

**Intention to apply for planning permission at Land at Baglan Way, Port Talbot**

Thank you for your notification of 04 February 2022 seeking the pre-application views of the Coal Authority on the above.

I have checked the site location plan against our coal mining information and can confirm that, whilst the proposed development site falls within the coalfield, it is located outside the Development High Risk Area as defined by the Coal Authority. Therefore, there are no recorded coal mining legacy hazards at shallow depth that could pose a risk to land stability at this site.

Accordingly, there is no requirement for the applicant to submit a Coal Mining Risk Assessment in support of any formal planning application for the redevelopment of this site and / or for the Local Planning Authority (LPA) to consult the Coal Authority on any

planning application for this site. The LPA should add our Standing Advice on any planning permission granted.

I trust that the above is helpful, however please do not hesitate to contact me if you would like to discuss this matter further.

Yours sincerely

D Roberts

**Deb Roberts** *M.Sc. MRTPI*

**Planning & Development Manager**

Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available data on the date of the response, and electronic consultation records held by The Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by The Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

## **NEATH PORT TALBOT COUNTY BOROUGH COUNCIL**

The Town and Country Planning (Development Management Procedure)  
(Wales) Order 2015 (as amended)

### **HEAD OF ENGINEERING & TRANSPORT**

#### **OBSERVATIONS**

PAC APPLICATION NO: N/4/22/0003/00  
APPLICANT: MR STEFFAN HARRIES  
LOCATION: LAND AT BAGLAN WAY, PORT TALBOT  
PROPOSAL: DEVELOPMENT OF AN INDUSTRIAL UNIT &  
ASSOCIATED WORKS INCLUDING SUSTAINABLE  
DRAINAGE, CAR PARKING, LANDSCAPING & OTHER  
ASSOCIATED WORKS.

---

The Highway/Drainage Authority, in responding to the above application, provides the following substantive response:

|                                                                                                           |                                     |
|-----------------------------------------------------------------------------------------------------------|-------------------------------------|
| <b>No comment</b>                                                                                         | <input type="checkbox"/>            |
| <b>No objection</b> (subject to any specified conditions below)                                           | <input checked="" type="checkbox"/> |
| <b>Concerns have been identified</b> (see below for how those concerns can be addressed by the applicant) | <input type="checkbox"/>            |
| <b>Objection</b> – on the grounds set out below                                                           | <input type="checkbox"/>            |
| <b>SAB Required</b>                                                                                       | <input checked="" type="checkbox"/> |

#### **MY OBSERVATIONS ON THIS PAC ARE AS FOLLOWS:-**

No highway objection in principle to the proposals submitted on drawing number 21.49-A03-Rev C and the supporting documents submitted as part of this pre application consultation process. This PAC submission follows substantive pre application advice to the applicant by NPTCBC Planning, Engineering and Transport sections. These comments however, are subject to any subsequent planning application submission being compliant with the following documents and inclusive of the guidance conditions below:-

- Neath Port Talbot County Borough Council - Parking Standards (Oct 2016).
- Neath Port Talbot County Borough Council - Design Guide for Streets and Public Realm for Residential and Commercial Developments.
- Planning Policy Wales Technical Advice Note 18: Transport
- Schedule 3 of the Flood and Water Management Act (FWMA) 2010 requires surface water drainage for new developments to comply with Mandatory National Standards for Sustainable Drainage (SuDS). Reference to the Non-

Statutory Ministerial National Standards and the CIRIA 753: The SuDS Manual is recommended.

- Welsh Government's Active Travel Guidance

### **Highway Observations**

The proposed new vehicular access points to the proposed unit are located off the public highway network, and shall tie into and be constructed to the adoptable standard and specification of the highway authority.

The visibility splays required for all the proposed new access points should be provided as detailed in Planning Policy Wales Technical Advice Note 18, Visibility Standards Table A and measured at a 4.5 metre setback for the heavy goods vehicular access off Moor Road and a 2.4 metre setback for the vehicular access point off Baglan Way. Any proposed gates adjacent to the highway should be of a type that open inwards only and are setback within the site to allow vehicles to be removed from the public highway whilst the gates are opened/closed.

Details of any signage (directional or otherwise) required for within or on the external public highway will need to be submitted for approval along with lumen levels should they be illuminated.

The car parking allocation as detailed within this pre application consultation is in compliance with NPTCBC SPG Parking Standards (2016). These spaces shall be dimensioned as 4.8 m x 2.6 m and 4.8 m x 3.6 m for disabled driver vehicle spaces.

The operational manoeuvring areas and proposed cycle parking stands are both acceptable in terms of area and location as detailed on the aforementioned drawing number.

### **SAB Application Requirement**

**It is noted that a SAB pre application has been submitted for this development and the respective response returned to the agent by the SUD's Approving Body Ref SP 2021/0023.**

Please note that SAB approval will be required prior to any work commencing. It is a breach of approval required under Paragraph 7 (1) Schedule 3 of the Flood and Water Management Act 2010 whereby action will be taken by the Authority under The Sustainable Drainage (Enforcement) (Wales) Order 2018. You can search the Authority's web site for further information using the link <https://www.npt.gov.uk/17534> or contact the Highway Development Control Section using [hdc@npt.gov.uk](mailto:hdc@npt.gov.uk) or 01639 686850.

## **NOTE (S) TO APPLICANT**

### **Active Travel**

Development proposals must seek to maximise walking and cycling accessibility by prioritising the provision of appropriate on-site infrastructure and where necessary off-site infrastructure. Walking and cycling infrastructure and services should be prioritised and put in place from the outset, before people have moved in and travel patterns have been established, as per Planning Policy Wales, Edition 11 and Future Wales – the National Plan 2040. All new walking and cycling infrastructure should be built to standards set out in Welsh Government's Active Travel Guidance and off-site infrastructure should link to (where possible) routes on Neath Port Talbot Council's Active Travel Network Map. This shows where walking and cycling routes already exist (Existing Routes) and where upgrades or brand new routes are anticipated for the next 15 years (Future Routes) in built up areas. Further information on the Active Travel Guidance and Neath Port Talbot's Active Travel Network Map can be found here: [www.npt.gov.uk/activetravel](http://www.npt.gov.uk/activetravel).

### **S.38/278 Agreement Requirement**

#### **Works on the Existing Highway (S.38 / 278 Hybrid)**

Developers' attention is drawn to the provisions of Section 278 of the Highways Act, 1980 in cases where a development would require access or other works to be carried out within the existing highway. Where highway works to benefit a development require land adjacent to an existing highway to be constructed upon together with works on the existing public maintained highway, a hybrid S38/278 shall be used. Works that are to be undertaken within the existing public maintained highway **only** will require a S278 agreement. **No** Work shall be undertaken on the existing public maintained highway until the appropriate legal agreement has been entered into.

Any works undertaken on the public highway without the appropriate legal agreement with the Highway Authority, the Highway Authority has the right to request the developer to remove and/or reinstate that part of the highway back to its original condition to the satisfaction of the Highway Authority.

A plan detailing the differences between the existing and proposed highway shall be submitted to form part of the legal agreement, this should be made up of two colours, green for the proposed area to be adopted and brown for the existing highway.

Developers are reminded that consent under the Town and Country Planning Act, 1990/91, conveys no approval for works to be undertaken affecting any part of the public highway, including verges and footways. The Developer must:-

- (i) Obtain the approval of Neath Port Talbot County Borough Council as Highway Authority for the details of any works to be undertaken in the Public Highway.
- (ii) Indemnify the Authority against all claims arising from such works, including claims under the Land Compensation Act.
- (iii) Give not less than 10 working days notice in writing of the date of commencement of the works.

As part of this process you are advised that only certain contractors are permitted to undertake the works on the public highway, a list of these contractors are available from the Highway Authority's Highway Development Control Section.

SIGNED:



DATE: 3<sup>rd</sup> March 2022

**pp HEAD OF ENGINEERING & TRANSPORT**

PAC Ref: N422000300 - LAND AT BAGLAN WAY, PORT TALBOTJW

**From:** [Rob Dunning](#)  
**To:** [Steffan Harries](#)  
**Subject:** RE: Pre-Application Consultation - proposed glass processing facility at Baglan Way, Port Talbot  
**Date:** 08 February 2022 10:46:30

---

Dear Steffan,

Many thanks for the pre-planning enquiry. We have consulted the regional Historic Environment Record (HER) and note there are no known sites within the proposed development area. A review of historic Ordnance Survey mapping indicates no significant features or structures. Furthermore, modern aerial photography shows that the site has been subject to large scale stripping and ground intrusion works. These are likely to have had an adverse effect on any potential remains that may have been present. Overall, it is unlikely that archaeologically significant remains will be encountered.

As such, should a similar application to the one you have outlined be submitted, we would be unlikely to recommend any pre-determination works, or that any archaeological conditions are attached to any consent.

Should you require anything further, please get in touch.

Regards,

Rob

Rob Dunning BSc MCIfA  
Archaeological Planning Officer  
Glamorgan-Gwent Archaeological Trust Ltd  
SA12 Business Centre  
Seaway Parade  
Baglan Energy Park  
Port Talbot  
SA12 7BR

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**From:** Steffan Harries <[steffanharries@lrmpplanning.com](mailto:steffanharries@lrmpplanning.com)>  
**Sent:** 04 February 2022 14:20  
**To:** [HDC@npt.gov.uk](mailto:HDC@npt.gov.uk); [NDCPlanning.Planning@dwrcymru.com](mailto:NDCPlanning.Planning@dwrcymru.com);  
[planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk); [Cadwplanning@gov.wales](mailto:Cadwplanning@gov.wales);

swplanning@cyfoethnaturiolcymru.gov.uk; Bregs@mawwfire.gov.uk

**Cc:** plantprotection@cadentgas.com; wpdnewsupplieswales@westernpower.co.uk; enquiries@wwutilities.co.uk; GGAT Planning <planning@ggat.org.uk>; Michael.Harvey2@south-wales.pnn.police.uk; l.palmer@npt.gov.uk; r.sharp@npt.gov.uk; kathryn@kewplanning.co.uk; Nathan Goldup-John <nathan@kewplanning.co.uk>

**Subject:** Pre-Application Consultation - proposed glass processing facility at Baglan Way, Port Talbot

Dear Sir/Madam,

I am writing to you as a specialist consultee or adjoining landowner as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, to serve the attached notice. This notice comprises a formal request for Pre-Application Consultation comments under article 2D of the Order as Modified by Article 2G.

This relates to a planning application for the development of an industrial unit for the processing of glass, and associated works including sustainable drainage, car parking, landscaping and other associated works on land at Baglan Way, Port Talbot.

For transparency, this email is addressed to the following bodies/persons in accordance with the requirements listed in the table under schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016:

- **Neath Port Talbot Council Highways Authority** – as the development is likely to result in a material increase in the volume of traffic entering or leaving a classified road; the development involves the formation or alteration of a means of access to a highway; and as an adjoining landowner.
- **Dŵr Cymru Welsh Water** – as the water and sewerage undertaker concerned and the development involves new industrial development.
- **The Coal Authority** – as the development lies within an area which has been notified for the purpose of this provision to the local planning authority by the Coal Authority because of the presence of land instability risks from coal mining.
- **Cadw** – as the development measures over a hectare and is within a distance of 3 kilometres from the perimeter of a scheduled monument, in the form of Ruins of St Baglan's Church (0.75km north-east), Plas Baglan (0.90km north-east), Craig Ty Isaf Camp (1.8km north-east), Cwm Clais Castle Mound (1.9km east), Briton Ferry Dock Entrance (2.2km north-west), Buarth y Gaer (2.4km north-east), and Mynydd y Gaer (2.9km north-east).
- **Natural Resources Wales** – The development is within 250 metres of land which has, at any time in the 30 years been used for the deposit of refuse or waste; and is designated as Flood Zone C1.
- **Fire and Rescue Authorities** – as the floor space to be created by the development is 1,000 square metres or more; and development carried out on a site having an area of 1 hectare or more.

The email is also addressed to the following non-statutory bodies voluntarily to provide an opportunity to comment on the proposed development prior to submission.

- **National Grid;**
- **Western Power;**
- **Wales and West Utilities;**
- **Glamorgan Gwent Archaeological Trust;**
- **Designing Out Crime Officer (South Wales Police);**

**Neath Port Talbot Biodiversity Officer; and**  
• **Neath Port Talbot Case Officer.**

The formal notice attached provides information about the proposals and gives details on how to view the draft planning application, which is now available for viewing on our website at [www.lrmplanning.com](http://www.lrmplanning.com), and includes drawings, draft planning application forms and draft Design & Access Statement, along with other supporting documents.

To access this information, please follow the menu on the blue bar on the left-hand side of the webpage, click on 'Public Consultation', and then on '*Land at Baglan Way, Port Talbot*'.

The formal consultation begins today, Friday 4<sup>th</sup> February and runs for 28 days until Friday 4<sup>th</sup> March. In accordance with the requirements of article 2E of the Order, any response you wish to make must be received by this date.

If you have any queries, please do not hesitate to contact me on the details provided below.

Kind regards,

**Steffan Harries** Director  
BSc (Hons) MA(UD) MRTPI

t: 02920 349737 m: 07500 931546

website: [lrmplanning.com](http://lrmplanning.com)

twitter: [@lrmplanning](https://twitter.com/lrmplanning)

[LRM Planning Covid-19 Statement](#)

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ

Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ



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**Police Headquarters**

Cowbridge Road  
Bridgend  
CF31 3SU

In an emergency always dial **999**  
for non-emergencies dial **101**  
Website: [www.south-wales.police.uk](http://www.south-wales.police.uk)

Neath Police Station  
Gnoll Park Road  
Neath  
SA11 3BW

Tel 07815 953 028

[Michael.Harvey2@south-wales.pnn.police.uk](mailto:Michael.Harvey2@south-wales.pnn.police.uk)

16th February 2022

LRM Planning Ltd  
Cardiff

Dear Mr Harries

**Re: Proposed Glass Processing Facility Baglan Way.**

In relation to the above planning application I would have the following observations to make :-

**(i). Perimeter security.**

The whole site should be protected by security fencing. The fencing should meet the security standard LPS 1175 SR1 or equivalent, be at least 2.4 metres high, manufactured of weld mesh, expanded metal or similar and be of a design that is difficult to climb over. It should be sited on a hard surface or embedded in the ground.

Barriers should control vehicle access onto site as there has been a problem with travellers occupying open spaces in this area e.g. vehicle parking areas.

If the site is unoccupied, gates of the same standard as specified above should secure it. If padlocks and chains are used to secure the gates they must meet appropriate security standards e.g. Sold Secure Gold.

**(ii). Vehicle access.**

Vehicle access onto site should be controlled by the installation of barriers at the

Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

South Wales Police welcomes receiving correspondence in Welsh and English.  
Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



vehicle entrances with access control fitted. Vehicle access onto the sites must be prevented when the site is unoccupied.

### **(iii). CCTV.**

I would ask for the outside and the main entrances into the building, vehicle entrances onto the site, the vehicle parking areas and bike and bin stores to be protected by CCTV.

The CCTV cameras should be located in elevated positions. Ideally the CCTV would be monitored.

The images produced must be admissible in a court of law and the General Data Protection Regulations (GDPR) must be complied with.

### **(iv). Signage.**

Signs should be sited advertising the fact that CCTV cameras are operating in the area if CCTV is installed.

### **(v). Lighting.**

The whole of this development, especially the vehicle parking areas, should benefit from lighting that meets the British Standard 5489.

The lighting must be effective and enhance CCTV coverage if installed.

The lighting must be situated in elevated positions to prevent vandalism and be protected in vandal proof housings.

### **(vi). Landscaping.**

Maximum surveillance must be maintained across the whole development site. Ideally plants and bushes would only grow to a maximum height of 1 metre. The view of the car parking areas from the unit must not be obscured by trees or planting.

Trees should be located in areas where they do not obstruct CCTV coverage or lighting or provide an assist to climbing. They should have no branches below 2 metres from the ground. This is to allow clear lines of sight across the whole of the development.

### **(vii). Vehicle parking areas.**

Vehicle access into the parking areas should be controlled by barriers (as already outlined).

Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

South Wales Police welcomes receiving correspondence in Welsh and English. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Vehicle parking areas must be well lit, ideally the lighting meeting the British Standard 5489. All vehicle parking bays should be protected by monitored CCTV.

The perimeter of the car parking areas must be clearly defined and access confined to the main vehicle entrance/exit points.

There must be clear lines of sight across the vehicle parking areas with any planting being low level. Ideally these area would be overlooked by the building.

#### **(viii). Bicycle stores.**

Bike stores must be secure, lit and overlooked (please visit [www.securedbydesign.com](http://www.securedbydesign.com) for more information).

#### **(ix). Bin stores.**

Bin storage areas should be secure areas protected by solid doors/gates. Access into these areas should be controlled by access control and they should be located away from the buildings.

#### **(x). Building shell security.**

The building must be constructed of materials that are resistant to attack. The first two metres of the external walls must be brickwork or materials of a similar strength.

The design must take into account the need to prevent features that aid scaling or climbing and hidden areas must be designed out.

#### **(xi). Drainpipes.**

Rainwater down pipes can provide a convenient scaling aid onto roofs, or to reach windows above ground floor level. Rain water pipes should be either flush fitting (i.e. square profile) or concealed within the cavities.

#### **(xii). Intruder alarm systems.**

The building especially the administrative and staff accommodation should be alarmed on all floors when unoccupied, with the alarm system linked to a central monitoring station. All rooms where there is valuable equipment or information stored should be alarmed and any alarm wires should be protected.

#### **(xiii). Access control.**

Access into the building and from public areas into semi private and private areas e.g. into the administrative and staff accommodation, should be controlled via access control e.g. fob, swipe card etc.

Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

South Wales Police welcomes receiving correspondence in Welsh and English. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Entry into all rooms where valuable equipment is sited should also be controlled and these rooms must be kept locked when not in use.

Access control should meet Secured by Design (SBD) standards and specifications.

#### **(xiv). Door security.**

The external doors of the buildings, those separating public and private areas and those protecting rooms where valuable property or information is stored should meet where possible the standard PAS 24 2016, LPS 1175 SR2 or equivalent and be third party tested and certificated.

Glass in door panels or adjacent to door panels should be laminated.

Doors in recesses of more than 600mm should be avoided.

All vertical lift doors/ roller shutter doors fitted must be locked in place, internally and externally, when the building is unoccupied.

In respect of operating mechanisms external fittings must be avoided. Internal mechanisms must be secure and sited away from the door openings.

Fire doors must not have external door furniture fitted, and should meet SBD standards and specifications. They must also be alarmed. Doors that are described as fire doors, or where fire performance is declared or implied, are required to have third-party certification for both security and fire performance.

Doors should be protected against ram raiding.

#### **(xv). Window security.**

All vulnerable external windows should meet SBD standards i.e. PAS 24 2016 or equivalent and be third party tested and certificated.

All glass in vulnerable windows i.e. ground floor windows within this development should be laminated.

#### **(xvi). Computers.**

Careful siting of power trunking is required to ensure that computers and valuable equipment are kept away from windows wherever possible.

High risk and mainframe computers should be secured in a purpose built room in individual cabinets.

Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

South Wales Police welcomes receiving correspondence in Welsh and English.  
Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Further more detailed information can be found on the Secured by Design website at [www.securedbydesign.com](http://www.securedbydesign.com) .

If you require any further information or to discuss any of the points raised in this report please do not hesitate to contact me.

Yours Sincerely

**Mike Harvey**

**Designing out Crime Officer**

**Please Note.**

For the Secured by Design award to be made PAS 24 2016 doors and windows must be permanently and preferably visibly marked PAS 24 2016. They must also be third party tested and certificated.

*Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.*

*South Wales Police welcome's receiving correspondence in Welsh and English. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.*

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