



PRE-APPLICATION CONSULTATION STATEMENT

**FORMATION OF A TRUCK STOP, (INCLUDING RETENTION OF MINOR ALTERATIONS UNDERTAKEN TO APPROVED PLANS GRANTED PLANNING PERMISSION UNDER P2005/0449 TO FORM A GUEST HOUSE) WITH ADDITION OF A CAFÉ & ERECTION OF REAR SINGLE-STOREY EXTENSION TO ACCOMMODATE SPA FACILITIES, TOGETHER WITH FORMATION OF AN HGV PARKING AREA WITH ELECTRIC VEHICLE CHARGING HUB POINTS, INTERNAL ACCESS ROAD & ASSOCIATED INFRASTRUCTURE
AT
TYN-Y-CAEAU, MARGAM ROAD, MARGAM, SA13 2NW**

**On behalf of
Recycling Plant & Machinery Limited**

Our Ref: 1112c

Date: December 2022

Prepared by: Iwan Easton

Approved by: Richard Banks

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1.0 INTRODUCTION

- 1.1 This Pre-Application Consultation Statement (PACS) has been prepared in response and in line with the guidelines and requirements of the Planning (Wales) Act 2015 and the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (the Order).

The proposal to which this PACS relates is the *“FORMATION OF A TRUCK STOP, (INCLUDING RETENTION OF MINOR ALTERATIONS UNDERTAKEN TO APPROVED PLANS GRANTED PLANNING PERMISSION UNDER P2005/0449 TO FORM A GUEST HOUSE) WITH ADDITION OF A CAFÉ & ERECTION OF REAR SINGLE-STOREY EXTENSION TO ACCOMMODATE SPA FACILITIES, TOGETHER WITH FORMATION OF AN HGV PARKING AREA WITH ELECTRIC VEHICLE CHARGING HUB POINTS, INTERNAL ACCESS ROAD & ASSOCIATED INFRASTRUCTURE”* at Land at Tyn-y-Caeau, Margam Road, Margam, Port Talbot.

- 1.2 This PACS therefore provides information on what consultation measures have been undertaken, what results and responses were generated as a result of these various processes and any impact they may have then had on the proposed development to which it relates.

2.0 ON-SITE PUBLICATION

2.1 SITE NOTICE

In line with the requirements of Schedule 1B of the Order, site notices have been displayed at the application site since 2nd November 2022. Below are photographs of the two site notices in position, affixed to positions at the gated entrance to Tyn-y-Caeau; and at a position off the southern footway about the A4241 roundabout with the A48 road respectively. A copy of the Site Notice is included at Appendix 1 of this Statement



Photo 1 – Notice erected upon a highway sign post adjoining application site



Photo 2 – Notice upon a traffic sign pole at the junction off the A4241 roundabout

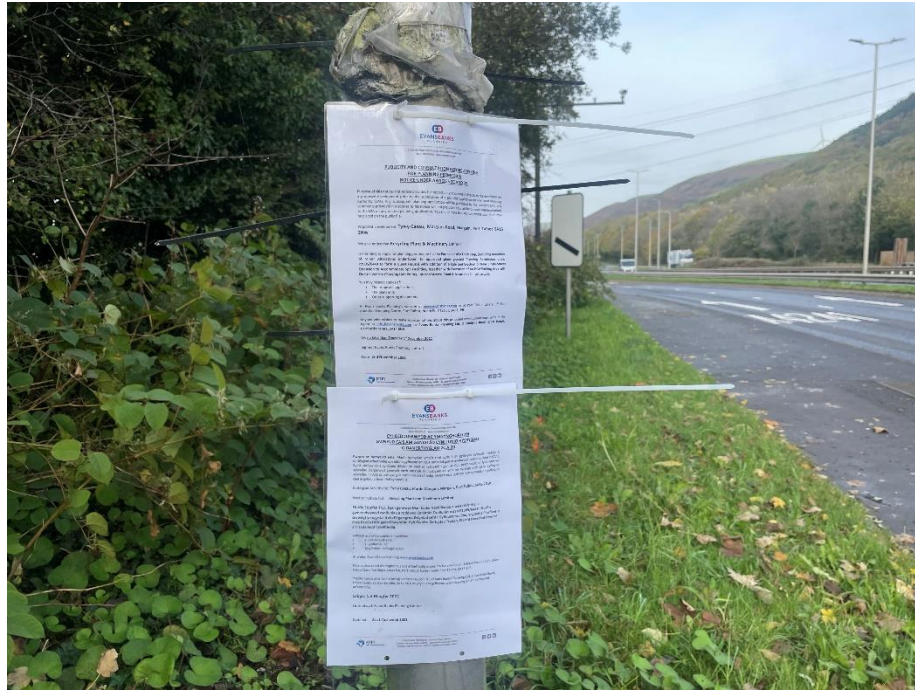


Photo 3 – close up view of erected Notices

2.2 NOTIFICATION TO ADJOINING OWNERS AND OCCUPIERS

2.2.1 In line with the requirements of Schedule 1B of the Order, a letter of notification has been issued to the occupier or owner of the land and property as listed below advising of the intended submission of the planning application in question, where a copy of the draft application submissions can be viewed and by when any representations they may have are to be submitted.

- Welsh Government Estates Directorate
by e-mail - estatesprofessionalservices@gov.wales

2.2.2 A copy of the notice can be found at Appendix 1 and a list of the addressees is included at Appendix 2 of this Statement.

2.3 DRAFT PLANNING APPLICATION

2.3.1 An indication has been provided on the Site Notice and the letters to adjoining owners and Members of the Public that a draft copy of the application can be viewed at Evans Banks Planning website at www.evansbanks.com/consultations. Copies were also placed on deposit for inspection at the Public Library in the Afan Shopping Centre at Port Talbot.

2.3.2 The draft application package included the following:

Design and Access Statement
Annexe Existing Elevations & Floor Plans
Application Forms

Bat Report
Tree Report
Dormice Mitigation Report
Drainage Strategy Plan
Drainage Details
Drainage Notes
Drainage – SUDS Details
Environmental Statement
Non-Technical Summary of ES
Landscape & Visual Impact Assessment
Existing 3D Elevations, Elevations & Floor Plans
Highway General Arrangement Plan
Location Plan
Proposed 3D Elevations
Proposed Annexe Elevations
Proposed Annexe Floor Plans
Proposed Bat Roost Plan
Proposed Elevations
Proposed Floor Plans
Site Layout and Landscaping Plan
Topographic Survey
Tree Survey Report
Vehicle Swept Path Plan

3.0 COMMUNITY AND STATUTORY CONSULTATION

3.1 CONSULTATION WITH COMMUNITY CONSULTEES

3.1.1 A copy of the draft application was provided to the following on 2nd November 2022 via e-mail (a copy of the letter attached to that e-mail sent can be found at Appendix 3):

- County Councillor Robert Jones
- County Councillor Dennis Keogh
- County Councillor Laura Williams

3.2 CONSULTATION WITH STATUTORY CONSULTEES

3.2.1 A copy of the draft application was provided to the following on 2nd November 2022 via email and letter (an issued Notice can be found at Appendix 4):

- Neath-Port Talbot County Borough Council – Highways Directorate
- Welsh Water
- Natural Resources Wales
- CADW
- Coal Authority
- Welsh Government Trunk Roads Division
- Mid & West Wales Fire Authority

4.0 RESPONSE TO REPRESENTATIONS RECEIVED

This section of the PACS provides a summary of all responses received to the pre-application consultation process in terms of the three processes outlined in previous sections of this Statement, as well then as an indication of any subsequent changes made to the proposed development as a result of them. A copy of all responses received can be found at Appendix 5.

4.1 ON-SITE PUBLICATION

Site Notice & Neighbouring Landowners / Properties

- 4.1.1 The PAC exercise did not generate any formal responses as a result of the erected site notices, which are as follows.
- 4.1.2 The PAC exercise did not generate any formal responses as a result of the formal letter notice distributed to the adjoining landowner.

4.2 STATUTORY CONSULTATION RESPONSES

Statutory Consultees

- 4.2.1 The following provides a summary and response to each of the comments received as a result of correspondence/meetings with Statutory Consultees.

Point Raised	Response
Natural Resources Wales – has noted the breadth of extensive habitat and grassland surveys prepared within the application, and has minor queries	NRW's response is welcomed and scope for minor amendments noted
Welsh Water – have no objections indicating that sufficient sewer capacity and water supply capacity exists to cater for any additional flows from the proposed development. They also highlight the presence of their existing apparatus at the site.	The response is noted and welcomed.
NPTCBC Highways – Object to the draft proposals, on the grounds that there are concerns over the location and use of the proposed access. There were also concerns over the potential increase in traffic generation as a result of the development.	The response is noted however the applicants fundamentally disagree with the concerns made as the scheme has been prepared in line with National Highway Guidance and procedure.
Coal Authority – the site lies within a Development High Risk Area for mining legacy. A Coal Mining Risk Assessment must be prepared which provides further commentary on risks of shallow mine workings.	A Coal Mining Risk Assessment is included within the application and reveals coal legacy to be off the site / or not affected by the proposals.

Mid & West Wales Fire Authority – offer technical comments relating to distances from available water supplies for firefighting purposes	The comments are welcomed and noted
CADW – offer no objections to the proposals in relation to the setting of Margam's Scheduled Ancient Monuments	The comments are welcomed and noted

- 4.2.2 No response has been received from County Councillors Robert Jones, Dennis Keogh or Laura Williams.

4.3 SUMMARY

- 4.3.1 The Applicants have generally welcomed the Pre-Application Consultation responses from Statutory Consultees.
- 4.3.2 The application particulars seek compliance with the policies and procedures of the Neath-Port Talbot Local Development Plan in terms of promoting a modest Truck Stop on a part of Margam which is encircled with proposed Employment land as defined within the LDP.
- 4.3.3 The proposals seek to retain all buildings within the grounds of the former smallholding for conversion to guest rooms and associated café. The only new form of physical development within the grounds of Tyn-y-Caeau will be surfaced HGV and car parking areas and an internal road. Attention has been paid to ensuring such areas benefit from means of surface water through sustainable drainage systems.
- 4.3.4 The proposals seek to retain all mature tree specimens within the Tyn-y-Caeau grounds, which have also been assessed for Bat Habitats. No specimens are to be felled and thus any dormice habitat can be adequately mitigated for as part of the proposals. Reptile and Grassland Surveys have also taken place and revealed no known habitat or flora of significant interest.
- 4.3.5 The proposals will improve an existing vehicular access onto the A48 dual carriageway at Margam Road. An examination on site has revealed that if public highway verges are properly maintained of vegetation growth, that a visibility splay of 4.5m x 160m can be easily achieved and retained thereafter.
Furthermore, the application proposals can introduce a deceleration lane to ensure that entering vehicles can adequately decelerate whilst turning into the site, and not present road safety risks to other motorists.

Appendices

APPENDIX 1

COPY OF SITE NOTICE

APPENDIX 2

LIST OF ADDRESSES

APPENDIX 3

COPY OF NOTICE TO STATUTORY CONSULTEES

APPENDIX 4

COPY OF RESPONSES RECEIVED

APPENDIX 1

COPY OF SITE NOTICE

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D

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 **Tyn-y-Caeau, Margam Road, Margam, Port Talbot SA13 2NW**

We give notice that **Recycling Plant & Machinery Limited**

Is intending to apply for planning permission for the **Formation of a Truck Stop, (including Retention of Minor Alterations undertaken to approved plans granted Planning Permission under P2005/0449 to form a Guest House) with addition of a Café and Erection of Rear Single-Storey Extension to Accommodate Spa Facilities, together with Formation of an HGV Parking Area with Electric Vehicle Charging Hub Points, Internal Access Road & Associated Infrastructure.**

You may inspect copies of:

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

At Evans Banks Planning's website at www.evansbanks.com or at Port Talbot Library, 1st Floor Aberafan Shopping Centre, Port Talbot, Neath Port Talbot, SA13 1PB.

Anyone who wishes to make representations about this proposed development must write to the Agent at info@evansbanks.com or **Evans Banks Planning Ltd, 2 Llandeilo Road, Cross Hands, Carmarthenshire, SA14 6NA**

By: no later than Thursday 1st December 2022

Signed: Evans Banks Planning Limited

Date: **2nd November 2022**

Appendix 2

LIST OF ADDRESSES

Statutory	Sent by	Address/Email Address
CADW	Email	cadwplanning@gov.wales
Dwr Cymru/Welsh Water	Email	Developer.services@dwrcymru.com
NRW	Email	swplanning@cyfoethnaturiolcymru.gov.uk
NPT Highways	Email	HDC@npt.gov.uk
NPT Planning Department	Email - FYI	planning@npt.gov.uk
Coal Authority	Email	planningconsultation@coal.gov.uk
Fire & Rescue Service	Email	mail@mawwfire.gov.uk
Trunk Roads	Email	LGC_Development_Control-South@gov.wales
Councillors – Margam & Taibach	Email	Councillor Rob G Jones – cllr.r.g.jones@npt.gov.uk Councillor Dennis Keogh – cllr.d.keogh@npt.gov.uk Councillor Laura Williams – cllr.l.williams@neath-porttalbot.gov.uk
Welsh Office	Email	estatesprofessionalservices@gov.wales

Appendix 3

COPY OF NOTICE TO STATUTORY CONSULTEES

Email to Statutory Consultees:

Dear Sir / Madam,

We are instructed by Recycling Plant and Machinery Limited to give formal notice under Part 1A of Article 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

The site area of the proposed development exceeds one hectare, and therefore constitutes a "major" development, whereby the Welsh Government pre-application consultation procedures (PAC) apply (*The Town and Country Planning (Development Management Procedure)(Wales)(Amendment) Order 2016*)('the Order').

The formal notification relates to a Pre-Application Consultation exercise in preparation of a submission for full planning permission for the following development –

**Formation of a Truck Stop, (including Retention of Minor Alterations undertaken to approved plans granted Planning Permission under P2005/0449 to form a Guest House) with addition of a Café and Erection of Rear Single-Storey Extension to Accommodate Spa Facilities, together with Formation of an HGV Parking Area with Electric Vehicle Charging Hub Points, Internal Access Road & Associated Infrastructure.
At Tyn-y-Caeau, Margam Road, Margam, Port Talbot SA13 2NW**

We attach a formal Notice under Article 2D of the Order for your attention as a statutory consultee as specified within the Order.

Members of the public, statutory bodies, and other third-parties, have a minimum period of 28 days within which to make representations in respect of the proposed development, in this instance, **by not later than 1st December 2022**

At the end of this period, all representations will be carefully considered by Evans Banks Planning prior to finalising the formal planning application. All representations received will be included within the pre-application consultation report that will accompany the submitted planning application to Neath-Port Talbot County Borough Council.

Any representations that you may wish to make within the stipulated time period, should be submitted in writing to –

Evans Banks Planning Ltd., 2 Llandeilo Road, Cross Hands, Carmarthenshire, SA14 6NA, or preferably, by e-mail to info@evansbanks.com.

Copies of the proposed application documentation are available for inspection upon our website at www.evansbanks.com/consultations

Should you have any queries, or wish to discuss the PAC exercise, please telephone the undersigned on the numbers below.

Sent to:

**Welsh Water
Coal Authority
CADW**

Welsh Government Estates Department

Councillors Rob Jones, Dennis Keogh & Laura Williams

NRW

NPT Highways Dept.

WG Trunk Roads Agency

MWW Fire & Rescue Service

Appendix 4

COPY OF RESPONSES RECEIVED

**NEATH-PORT TALBOT COUNTY BOROUGH COUNCIL
HEAD OF TRANSPORT & ENGINEERING**

PAC APPLICATION NO: N/4/22/0013/00

APPLICANT: LAURA NEWCOMBE - EVANS BANKS PLANNING LIMITED

LOCATION: TYN-Y-CAEAU, MARGAM ROAD, MARGAM, SA13 2NW

PROPOSAL: FORMATION OF A TRUCK STOP, (INCLUDING RETENTION OF MINOR ALTERATIONS UNDERTAKEN TO APPROVED PLANS GRANTED PLANNING PERMISSION UNDER P2005/0449 TO FORM A GUEST HOUSE) WITH ADDITION OF A CAFÉ & ERECTION OF REAR SINGLE-STOREY EXTENSION TO ACCOMMODATE SPA FACILITIES, TOGETHER WITH FORMATION OF AN HGV PARKING AREA WITH ELECTRIC VEHICLE CHARGING HUB POINTS, INTERNAL ACCESS ROAD & ASSOCIATED INFRASTRUCTURE.

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

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐
SAB (SAB approval is required)	☒

MY OBSERVATIONS ON THIS PAC ARE AS FOLLOWS:-

ALL PLANNING SUBMISSIONS MUST BE IN COMPLIANCE WITH THE FOLLOWING DOCUMENTS:-

- NEATH PORT TALBOT COUNTY BOROUGH COUNCIL - PARKING STANDARDS (OCT 2016).
- NEATH PORT TALBOT COUNTY BOROUGH COUNCIL – GUIDE TO THE LAYOUT OF DEVELOPMENT ROADS.
- PLANNING POLICY WALES TECHNICAL ADVICE NOTE 18: TRANSPORT.
- WELSH GOVERNMENT DOCUMENT – SUSTAINABLE DRAINAGE (SuDS) STATUTORY GUIDANCE AND IMPLEMENTATION OF SCHEDULE 3 TO THE FLOOD & WATER MANAGEMENT ACT 2010.
- PLANNING POLICY WALES, EDITION 11 AND FUTURE WALES – THE NATIONAL PLAN 2040.

1. DRAWING NUMBER 2020-547 SK04 REV B DETAILS THE PROPOSED RELOCATION OF THE EXISTING SIGNAGE ON THE ADOPTED PUBLIC HIGHWAY TO ACCOMMODATE THE REQUIRED 4.5 METRE X 160 METRE VEHICULAR VISIBILITY SPLAYS. HOWEVER, THE EXISTING LOCATION OF THE HIGHWAY SIGNAGE IS IN A FIXED LOCATION THAT IS BEST SUITED TO ASSIST DRIVERS LEAVING THE TRUNK ROAD. THE Y DISTANCE OF THE VISIBILITY SPLAY IS WITHIN LAND OUTSIDE THE CONTROL OF THE APPLICANTS LAND OWNERSHIP AND IS HEAVILY VEGETATED FURTHER IMPACTING DRIVER VISIBILITY ON EGRESS OF THE SITE. THEREFORE, IT IS THE VIEW OF THE HIGHWAY AUTHORITY THAT THE REQUIRED STANDARDS CANNOT BE MET. IT IS IMPORTANT THAT VISIBILITY ALLOWS DRIVERS ON THE MAJOR ROAD TO BE AWARE OF TRAFFIC ENTERING FROM THE MINOR ROAD IN TIME FOR THEM TO BE ABLE TO REDUCE SPEED AND STOP SAFELY IF NECESSARY.

2. THE PROPOSED NEW JUNCTION IS APPROXIMATELY 70 METRES AWAY FROM THE HARBOUR WAY (A4241) ROUNDABOUT. THIS FURTHER REDUCES THE LEAD IN LENGTH FOR HGV'S TO MANOEUVRE AND CHANGE LANES (WHERE NEEDED) TO HEAD IN THE DIRECTION OF THE M4. TO ENCOURAGE HGV'S TO UNDERTAKE A SUDDEN LAND CHANGE WITHIN SUCH A SHORT DISTANCE WOULD SEEK TO CREATE VEHICULAR BREAKING AND POSSIBLE SHUNTING OF MOTOR VEHICLES TO THE DETRIMENT OF HIGHWAY SAFETY. IN ADDITION THE EXISTING DUAL CARRIAGEWAY / SLIP ROAD HAS HORIZONTAL CURVED ALIGNMENTS WHICH ENCOURAGE DEVIATION TO THE LEFT BEYOND THE PROPOSED ACCESS/EXIT JUNCTION, MAKING THE LAND CHANGE EVEN MORE CHALLENGING.

3. ALL WORKS TO BE CONSTRUCTED ON THE PUBLIC HIGHWAY SHALL BE SUBJECT TO A ROAD SAFETY AUDIT STAGE 1-4 IN ACCORDANCE WITH HD 19/03 OF THE DESIGN MANUAL FOR ROADS AND BRIDGES. EACH STAGE OF THE ROAD SAFETY AUDIT SHALL BE SUBMITTED FOR APPROVAL IN WRITING BY THE LOCAL PLANNING AUTHORITY. ALL ISSUES HIGHLIGHTED AT EACH STAGE, BEING ADDRESSED TO THE WRITTEN APPROVAL OF THE LOCAL PLANNING AUTHORITY WITHIN THREE MONTHS OF THAT STAGE OF THE ROAD SAFETY AUDIT HAS BEEN APPROVED.

4. SHOULD A HGV DECELERATE TURNING LEFT INTO THE SITE, THE VISIBILITY FOR A HGV EXITING THE SITE IS OBSTRUCTED TEMPORARILY WHICH MAY ALLOW SMALLER VEHICLES TO ACCELERATE PAST THE HGV TURNING LEFT, WITH POTENTIAL FOR A COLLISION WITH A VEHICLE EXITING THE SITE. IT IS ASSUMED THAT THIS WOULD BE IDENTIFIED DURING THE REQUIRED ROAD SAFETY AUDIT STAGE 1 & 2.
5. The car parking arrangements and quantities shall be in accordance with Neath Port Talbot County Borough Council - Parking Standards SPG (Oct 2016), with Electric Vehicle charging being essential to the overall design.
6. A CONSTRUCTION METHOD STATEMENT HAS BEEN SUBMITTED TO AND APPROVED IN WRITING BY THE LOCAL PLANNING AUTHORITY. THE STATEMENT SHALL PROVIDE FOR:
 - (i) the parking of vehicles of site operatives and visitors
 - (ii) loading and unloading of plant and materials
 - (iii) storage of plant and materials used in constructing the development
 - (iv) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
 - (v) wheel washing facilities
 - (vi) measures to control the emission of dust and dirt during construction
 - (vii) a scheme for recycling/disposing of waste resulting from demolition and construction works
 - (viii) scheme for the erection of temporary/semi temporary signage warning drivers of speed restrictions.
 - (ix) The Construction Method Statement shall be signed by a competent person(s).

The approved Statement shall be adhered to throughout the construction period.

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7. 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

CONCLUSION

THE HIGHWAY AUTHORITY HAVE SIGNIFICANT SAFETY CONCERNS OVER THE LOCATION AND USE OF THE PROPOSED ACCESS. THE COUNCIL'S HIGHWAY AUTHORITY FEELS THAT THIS APPLICATION SHALL CREATE SIGNIFICANT TRAFFIC GENERATION COMPARED TO ITS CURRENT USE AND THE NEW PROPOSED JUNCTION GEOMETRY FRONTING ONTO THE DUAL CARRIAGEWAY AND HARBOUR WAY ROUNDABOUT IS LIKELY TO COMPROMISE THE SAFE, EFFECTIVE AND EFFICIENT USE OF THE HIGHWAY NETWORK AND WILL LIKELY HAVE AN ADVERSE IMPACT ON HIGHWAY SAFETY. THEREFORE THIS PROPOSAL DOES NOT COMPLY WITH POLICY TR2 AND SHOULD THE PROPOSAL BE SUBMITTED AS A FULL PLANNING APPLICATION, THE HIGHWAY AUTHORITY ARE LIKELY TO RECOMMEND REFUSAL FOR THIS PARTICULAR APPLICATION.

THESE OBSERVATIONS ARE PROVIDED WITHOUT PREJUDICE AND BASED UPON THE INFORMATION PROVIDED AT THE PRELIMINARY STAGE. HOWEVER, SHOULD FURTHER OR ADDITIONAL DETAILS BE SUBMITTED THEREAFTER, OUR OBSERVATIONS MAY CHANGE TO REFLECT THIS SUBMISSION.

DRAINAGE COMMENTS

1. Should any springs or ground water seepage be encountered the on site works in that area shall cease until a scheme for collection and disposal of the water has been submitted to and approved in writing by the Local Planning Authority. No ground water shall ever be discharged into the proposed drainage scheme.
2. There must be no interference, alteration or diversion of any ditch, watercourse, stream or culvert crossing or bordering the site, without prior consultation and agreement with the Authority.
3. Unless otherwise agreed in writing by the Local Planning Authority, foul water and surface water discharges shall be drained separately from the site.
4. No surface water or Land drainage run-off shall be allowed to connect, either directly or indirectly, to the public sewerage system unless otherwise approved in writing by the Local Planning Authority.
5. ADEQUATE PROVISION SHALL BE MADE FOR THE DRAINAGE OF THE SITE, TO ENSURE THAT THE DRAINAGE OF ANY ADJOINING LAND IS NOT INTERRUPTED OR OTHERWISE ADVERSELY EFFECTED BY THE DEVELOPMENT DURING THE LIFE TIME OF CONSTRUCTION.

NOTE(S) TO APPLICANT

IT IS RECOMMENDED THAT A SAB PRELIMINARY APPLICATION BE SUBMITTED THE SAME TIME AS THE PLANNING PROCESS TO ENSURE CONSISTENCY IN RESPECT OF LAYOUT AND LAND USE. THIS IS DEALT WITH UNDER SEPARATE LEGISLATION TO THAT OF PLANNING.

PRIOR TO ANY WORK COMMENCING ON SITE, A SAB APPLICATION IS TO BE SUBMITTED AND APPROVED BY THE SUDS APPROVING BODY.

SAB APPROVAL WILL BE REQUIRED PRIOR TO ANY WORK COMMENCING. TO COMMENCE WORK IS A BREACH OF SAB APPROVAL REQUIRED UNDER PARAGRAPH 7 (1) SCHEDULE 3 OF THE FLOOD AND WATER MANAGEMENT ACT 2010 WHEREBY LEGAL ACTION WILL BE TAKEN BY THE AUTHORITY UNDER THE SUSTAINABLE DRAINAGE

(ENFORCEMENT) (WALES) ORDER 2018. GUIDANCE AND APPLICATIONS CAN BE FOUND ON
[HTTPS://WWW.NPT.GOV.UK/17534](https://www.npt.gov.uk/17534)

Any existing on site infrastructure should be considered in SuDS design to find the most effective solution. It is important to understand the location and capacity of existing drainage to determine what infrastructure should be reused in the SuDS scheme. Other buried infrastructure, such as utilities, will need to be located and considered in the SuDS design. Using SuDS such as permeable paving and bio retention should be avoided in major service strips, as access will require disturbance and rebuilding of the SuDS system, but compatibility can be achieved by constructing dedicated and well-marked service strips that are designed with access in mind.

Please note the balancing pond located opposite the proposed site was designed to receive the highway water run-off from Harbour Way only. Therefore, a totally separate assessment is to be provided as part of the SAB Application which will be required for this development.

Neath Port Talbot County Borough Council offer a SAB pre application service, it is highly recommended that this route is explored prior to the submission of a full SAB application.

SIGNED: 

DATE: 1ST DECEMBER 2022

PP HEAD OF ENGINEERING & TRANSPORT

PAC REF: N/4/22/0013 JW



Ein cyf/Our ref: CAS-202477-W4L5

Maes Newydd,
Llandarcy,
Neath Port Talbot,
SA10 6JQ

ebost/email:
swplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 65 3358

Evans Banks Planning
2 Llandeilo Road
Cross Hands
Carmarthenshire
SA14 6NA

22nd November 2022

Annwyl Syr/Madam / Dear Sir/Madam,

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

BWRIAD / PROPOSAL: FORMATION OF A TRUCK STOP, (INCLUDING RETENTION OF MINOR ALTERATIONS UNDERTAKEN TO APPROVED PLANS GRANTED PLANNING PERMISSION UNDER P2005/0449 TO FORM A GUEST HOUSE) WITH ADDITION OF A CAFÉ AND ERECTION OF REAR SINGLE-STOREY EXTENSION TO ACCOMMODATE SPA FACILITIES, TOGETHER WITH FORMATION OF AN HGV PARKING AREA WITH ELECTRIC VEHICLE CHARGING HUB POINTS, INTERNAL ACCESS ROAD & ASSOCIATED INFRASTRUCTURE.

LLEOLIAD / LOCATION: TYN-Y-CAEAU, MARGAM ROAD, MARGAM, PORT TALBOT SA13 2NW

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 1st November 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 European Protected Species (Dormice). 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.

We also advise that based on the information submitted to date, we would ask the planning authority to include a condition regarding European Protected Species – Bats (Lighting) on any planning permission granted and the documents identified below in the approved plans and documents condition on the decision notice. Without the inclusion of this condition and documents by the planning authority we would be likely to object to the planning application.

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

Condition: A Lighting Plan

Documents:

- **Proposed Bat Roost Plan entitled 'Tyn-Y-Caeau, Margam, Port Talbot Proposed Plan Elevations' dated 04/11/21 by AE Architectural Designs;**
- **Drawing entitled 'Site Plan including Tree Survey Plan', drawing no 1120-O2F, Revision F, dated 05/08/21 by Thomas Login Architecture**

Ecology

Dormice

We have reviewed the report entitled '*Dormouse Mitigation Strategy – Land at Tyn y Caeau, Margam, Port Talbot, SA13 2NW*', dated January 2022 (Version 2). We welcome the principles of the document which are largely acceptable, however we advise that Section 5 entitled 'Precautionary Construction Methods' is amended so that clearance does not take place between the window of 1st June and 30th August, for the protection of the species. Additionally, we note that use of 'should' in the documents; this language will need to be amended so that the statements in the report refer to clear commitments. This document should therefore be updated and submitted in support of any subsequent planning application.

Bats

We have reviewed the report entitled '*Tyn-y-Caeau, Margam Road, Margam, Port Talbot, Neath Port Talbot, SA13 2NW – Bat Survey Report for Recycling Plant & Machinery Ltd*', by I&G Ecological Consulting, updated September 2022. We note the report has confirmed roost sites for lesser horseshoe, common and soprano pipistrelle within the existing buildings on site.

European Protected Species: Legislation and Policy

All species of British bats are European Protected Species, legally protected under The Conservation of Habitats and Species Regulations 2017. Legal protection relates to the animals themselves and the places they use to rest and breed.

Where a European Protected Species is present and development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. One of these requires that the development authorised will 'not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range'.

These requirements are translated into planning policy through Planning Policy Wales (PPW) Edition 11 dated February 2021, sections 6.4.22 and 6.4.23 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The planning authority

should take them into account when considering development proposals where a European Protected Species is present.

NRW Advice on the Application

Therefore, should the Local Planning Authority (LPA) be minded to grant planning permission, we advise that the two technical drawing listed at the beginning of the letter are included within the condition identifying approved plans and documents on the decision notice.

Additionally, to ensure that the lighting of the site does not compromise the effectiveness and likely uptake of the bat house, we advise that a lighting plan condition is attached to any planning permission granted. Given the species present, the proposals should aim to ensure that light does not spill on either the bat house or boundary vegetation.

Condition: Prior to its installation, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. The Lighting Plan should include:

- Details of the siting and type of external lighting to be used
- Drawings setting out light spillage in key sensitive areas, in particular the bat house and along the boundary vegetation
- Light modelling images to present the night time effects of lighting on building elevations and ground surfaces from key viewpoints the lighting shall be installed and retained as approved during

The lighting shall be installed and retained as approved.

Justification: A lighting plan should be submitted to ensure lighting details are agreed prior to installation and to reduce the impacts of lighting in the interest of protected species and their associated commuting and foraging habitat.

EPS Licence

We advise that the Applicant should refrain from building the proposed bat roost until they have submitted a European Protected Species (EPS) licence application and has received a licence for the development from NRW. Therefore, in line with the 'Dear CPO' letter issued by Welsh Government on 1st March 2018, we will request that the following informative is attached to any planning permission granted by the LPA:

Warning: An European protected species (EPS) Licence is required for this development.

This planning permission does not provide consent to undertake works that require an EPS licence.

It is an offence to deliberately capture, kill or disturb EPS or to damage or destroy their breeding sites or resting places. If found guilty of any offences, you could be sent to prison for up to 6 months and/or receive an unlimited fine.

To undertake the works within the law, you can obtain further information on the need for a licence from Natural Resources Wales on 0300 065 3000 or at <https://naturalresources.wales/permits-and-permissions/species-licensing/when-you-need-to-apply-for-a-protected-species-licence/?lang=en>.

Development should not be commenced until the Applicant has been granted a licence by Natural Resources Wales pursuant to Regulation 55 of the Conservation of Habitats and Species Regulations (2017) authorizing the specified activity/development to go ahead.

Ecological Report Timings

We note the 'Ecological Appraisal Report' is dated May 2020 and 'Tree Survey for Bat Potential' is dated 25th November 2020, both by I&G Ecological Consulting. Whilst we note the aforementioned bat survey for the site has been updated for this season, these two reports have not been updated since 2020 and either may be or are very close to being older than 2 years. Therefore, in line with best practice, consideration should be given to updating these reports in preparation to support any subsequent planning application, to ensure that the most up to date site information is available. We advise you discuss this further with the LPA's Ecologist.

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](#).

<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

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

Yn gywir / Yours faithfully

Hannah Roberts

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



200 Lichfield Lane
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Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

Evan Banks Planning Limited

[By Email: info@evanbanks.com]

16 November 2022

Dear Sir / Madam

PRE-APPLICATION Tyn-y-Caeau

Formation of a Truck Stop, (including Retention of Minor Alterations undertaken to approved plans granted Planning Permission under P2005/0449 to form a Guest House) with addition of a Cafe and Erection of Rear Single-Storey Extension to Accommodate Spa Facilities, together with Formation of an HGV Parking Area with Electric Vehicle Charging Hub Points, Internal Access Road & Associated Infrastructure.; Tyn-y-caeau, Margam Road, Margam, Port Talbot, SA13 2NW

Thank you for your notification of 01 November 2022 seeking the views of the Coal Authority on the above pre-application enquiry.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

I have checked the location plan and can confirm that the site falls within the Development High Risk Area as defined by the Coal Authority. Our records indicate that coal seams of workable thickness outcrop within the site and surrounding area that may have been historically worked at shallow depths beneath the site.

1

Protecting the public and the environment in mining areas

In accordance with the approach agreed with the Local Planning Authority (LPA), any planning application for re-development of this site needs to be accompanied by a Coal Mining Risk Assessment Report.

Whilst it is noted that this pre-application enquiry is accompanied by a Coal Mining Risk Assessment (BC/MB/05.20.03, 22 May 2020) prepared by Blandford Consulting, this has not been prepared for this specific proposal. Accordingly, as part of any formal planning application, the applicant needs to submit a development specific Assessment in order for the applicant to demonstrate to the LPA that the proposal is, or can be made safe and stable, as required by Planning Policy Wales (paras. 6.9.23 – 28).

It is noted that the above Assessment has failed to identify that shallow mine workings could be present within the site; as identified within the CON29M coal mining report (51002276499001, 19 May 2020) Section 1: Past underground coal mining, used to inform the above Assessment. Accordingly, further commentary on this specific risk would also need to be included within the revised Assessment.

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

Yours faithfully

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.



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Evans Banks Planning Ltd

By email: info@evansbanks.com

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date

Llinell uniongyrchol
Direct line

E-bost
Email:

LC

15 November 2022

0300 0256004

cadwplanning@gov.wales

Dear Sir/Madam

Pre-Planning Application - Formation of a Truck Stop, (including retention of minor alterations undertaken to approved plans granted planning permission under P2005/0449 to form a Guest House) addition of a Café and erection of rear single-storey extension to accommodate spa facilities, together with formation of an HGV Parking Area with Electric Vehicle Charging Hub Points, internal access road & associated infrastructure, Tyn-y-Caeau, Margam Road, Margam, Port Talbot SA13 2NW

Thank you for your letter of 1 November 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.

Having carefully considered the information provided, we have no objection to the proposed development in regards to the scheduled monuments or registered historic park and garden listed in our assessment of the application below.

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

Assessment

Scheduled Monuments

GM005 Margam Abbey
GM011 Margam Inscribed & Sculptured Stones
GM056 Danish Camp
GM159 Froyd Uchaf Round Barrow





On the west the rampart survives on a similar scale to the north-east section. On the north, the defences are crossed and largely obscured by a modern wall and field bank.

The enclosure was probably constructed to control access along the coast and allow the inhabitants to exploit the farmland and marshes of the Margam Plains. The significant views from the scheduled monument are therefore to the south in an arc from east to west.

The proposal is located some 530m south of scheduled monument GM488 Chain Home Low Radar Station, Margam which consists of the remains of a radar site dating to the Second World War. The radar station is part of the 'Chain Home Low'; designed to guard against enemy surface craft and submarines in the British Channel. The station consists of three rectangular concrete buildings with flat roofs, set on the high scarp of the Margam ridge facing south-east and overlooking the British Channel. The most north-westerly of the three retains the framework of a steel gantry, the base for a rectangular radar transmitter/receiver array, known as a 'bedstead array' from its wires and framework. The gantry is believed to be a unique survivor within the British Isles. Next to it is a generator house and southeast of this a probable stand-by generator house for use in case of breakdown or enemy attack. The station is likely to have been built by the army between 1941 and 1943, prior to the takeover of the system by the RAF.

The radar station was located on the ridge of ~~Cefn Cruagwylt~~ overlooking the Bristol Channel. This location was chosen to give the radar system a long range over the channel but generally views from the radar station were not important.

The proposed development will see a former dwelling house and adjacent annex at ~~Tyn-y-Caeau~~ utilised as a transport hub and service area for HGV drivers and other motorists. The existing two-storey buildings will continue to accommodate over-night Guest House use and be coupled with a café and serving bar at ground and lower floor levels. Parts of the grounds will accommodate the vehicle parking. The external changes to the house and annex will be minor and involve the removal of a rear conservatory to be replaced by single-storey spa extension and the provision of an external fire escape stairwell to the side elevation. The primary visual change will be the movement and parking of vehicles. They are likely to be seen in the identified significant views from scheduled monuments GM163 and GM477; however, vehicles will be seen in the context of the stream of traffic along the M4 in the foreground. Trees and vegetation surrounding the site will provide extensive screening. As such whilst there may be a very slight visual change in the view from the monuments this will not have any effect on the way that they are experienced, understood and appreciated. Consequently, the proposed development will have no impact on the settings of scheduled monuments GM163, GM477 and GM488.

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



Yours sincerely,

Laura Cooper
Policy and Protection





Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru
Mid and West Wales
Fire and Rescue Service

Prif Swyddog Tân | Chief Fire Officer
Roger Thomas BA(Hons), MSc

tancgc.gov.uk
mawwfire.gov.uk



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Gafynner am/
Please ask for:

Watch Manager Geraint Morgan

Rhif Est/Ext. No.

2277

E-bost/E-mail:

bregs@mawwfire.gov.uk

Fy Nghyf/My Ref:

GM/KDT/00340852

Dyddiad/Date:

01 November 2022



Dear Sir,

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
ORDER 2012**

THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

**DEVELOPMENT PROCEDURE (CONSULTEES) (WALES) (MISCELLANEOUS AMANDMENTS)
ORDER 2021 – FIRE AND RESCUE AUTHORITIES**

RE: Tyn-y-Caeau, Margam Road, Margam, Port Talbot SA13 2NW

APPLICATION NUMBER: N/A

I acknowledge receipt of the notification to the Mid and West Wales Fire and Rescue Authority in relation to the above application.

The site plan/s of the above proposal has been examined and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development

- The following concerns are identified, in relation to the proposed developments, together with suggestions as to how these can be addressed.
 1. Please confirm the Proposal meets the requirements of B5 Approved document B (Wales) 2020 in relation to water supplies and vehicle access for firefighting purposes.

The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the

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attached Appendix and the following links: <https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>

<https://www.ukfrs.com/index.php/promos/16847>

Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).

The plan/s has been retained for record purposes.

Yours faithfully



Watch Manager G Morgan
Authorised Fire Safety Inspecting Officer
On behalf of the Mid and West Wales Fire and Rescue Authority

Enc