

PROPOSED LIGHT INDUSTRIAL DEVELOPMENT AT OLD FOUNDRY ROAD, PONTARDAWE

Pre-Application Consultation Report

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PRE-APPLICATION CONSULTATION REPORT

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Appendix C Specialist Consultee Notice and Letter

Appendix D Specialist Consultee Responses

1 INTRODUCTION

- 1.1 From 1st August 2016, the Town and Country Planning (Development Management Procedure) (Wales) (Amendments) Order 2016 brought into effect various provisions set out in the Planning (Wales) Act 2015 including the requirement to undertake pre-application consultation which applies to all planning applications for 'major' development (full or outline) as defined in Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 and applications for Developments of National Significance (DNS).
- 1.2 This Pre-Application Consultation (PAC) report has been prepared in support of a full planning application, prepared by RPS on behalf of Bluefield Land Ltd, for the following:
- 1.3 *"The development of light industrial/commercial units (Use Class B2/B8) with associated parking, servicing, hard and soft landscaping and drainage infrastructure".*
- 1.4 This PAC report provides the background to the various consultation processes undertaken in accordance with the above legislation, sets out the consultation responses received and explains how the applicant has addressed these comments including any amendments to the development proposals which have emerged as a result.

Legislative Context

- 1.5 As stated above, the Town and Country Planning (Development Management Procedure (Wales) (Amendments) Order 2016 has brought into effect and provided the detail for various provisions set out in the Planning (Wales) Act 2015.
- 1.6 Detailed guidance on the requirements for pre-application consultation under Section 17 of the Planning (Wales) Act 2015 is contained in Annex 1 of the Welsh Government's letter to Chief Planning Officers dated 1st February 2016.
- 1.7 In November 2017, Welsh Government also issued 'Best Practice Guidance for Developers'. As set out in Annex 1 of the Best Practice Guidance, the applicant must undertake the following publicity/consultation procedures prior to the submission of the application:
- 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.
 - Write to any 'owner or occupier' of any land adjoining the land to which the proposed application relates.
 - Make the draft application available publicly online
 - Consult community and specialist consultees before applying for planning permission.
 - Consider if Environmental Impact Assessment is required for the project.
 - Submit a PAC report as part of the planning application.

Format and Context of the PAC

- 1.8 This PAC report follows the above legislation and guidance and therefore contains:
- a) A copy of the site notice (Appendix A);
 - b) A declaration that the site notice was displayed in accordance with the statutory requirements i.e. in at least one place on or near the development site for no less than 28 days (Appendix A);
 - c) A copy of the letter provided to adjoining owners/occupiers and community councillors (Appendix B);
 - d) Copies of all notices and letters provided to specialist consultees (Appendix C);
 - e) Copies of all responses received from specialist consultees with an explanation of how each response has been addressed (Table 3.1); and

- f) A summary of all issues raised in response to the statutory publicity (i.e. site notice and letters to owners and occupiers – the developer must confirm whether the issues raised have been addressed and if so, how they have been addressed (Table 3.2);

2 CONSULTATION

Site Notice

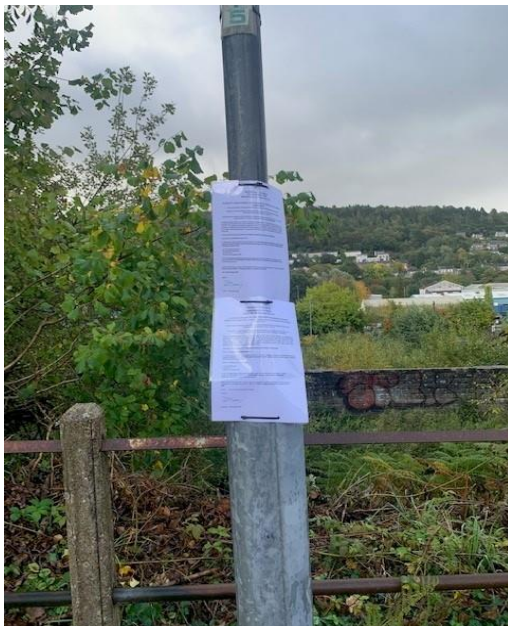
- 2.1 On behalf of Bluefield Land Ltd, RPS displayed a bi-lingual (English and Welsh) site notices (Appendix A) at various locations surrounding the site. The site notice included the dedicated website address for the proposed development where all draft application documents could be viewed. The site notice also included an email address where comments could be sent, and a telephone number should anyone wish to discuss the scheme or request hard copies of the draft application documents.
- 2.2 The locations of the site notices surrounding Old Foundry Road, Pontardawe are shown below.



Site Notice 1



Site Notice 2



Site Notice 3



Site Notice 4



- 2.3 The notices were erected on the 7th of October 2022 and remained in place for the required minimum of 28 days. A copy of the notice and a declaration to this effect is enclosed at **Appendix A**.

Adjoining Owner/Occupier and Community Councillor Notices

- 2.4 A Schedule 1B Notice Letter was sent to 169 occupiers/owners of land adjoining the development site and ward members on the Pontardawe Town Council. Examples of the notices and letters sent are included in **Appendix B**.

Availability of Draft Planning Application

- 2.5 A dedicated website for the proposed development was set up and hosted at <https://www.olfoundryroad-pac.co.uk> as seen in the screenshot below. The website was live from the 7th of October 2022.

- 2.6 The website's homepage and draft application page contained the proposed application, the plans; and other supporting documents.
- 2.7 During the consultation period no hard copies of the application documentation were requested.
- 2.8 The website also had a link button which allowed visitors to comment directly on the development proposals by emailing info@oldfoundryroad-pac.co.uk.
- 2.9 During the period from the 7th of October 2022 to the 7th of November 2022, the website was visited a total of 874 times. Of these visits 86.11% stayed between 1 and 60 seconds, 12.54% stayed between 1 and 10 minutes, and 1.34% stayed between 10 and 30 minutes and 0.0% longer than 30 minutes. Of the 874 visits to the website, 89% were accessed from a desktop while 11% were accessed from a mobile device.

Specialist Consultees Consultation

2.10 Developers are also required to undertake pre-application consultation with 'specialist consultees'. The following were consulted on the 7th of October 2022:

- Natural Resources Wales (NRW)
- Cadw
- Dwr Cymru Welsh Water (DCWW)
- Neath Port Talbot as the Highways Authority
- Neath Port Talbot as the Local Planning Authority
- South Wales Fire and Rescue
- Canals and Rivers Trust
- The Coal Authority

2.11 The notices and letters sent are included at **Appendix C**.

Requirement for Environmental Impact Assessment

2.12 The proposed development has not been the subject of a formal Screening Request. It is not considered the scheme meets the threshold for an Environmental Impact Assessment (EIA). In any event, the application will be screened at the submission stage.

3 RESPONSES TO THE CONSULTATION PROCESS

Specialist Consultee Responses

- 3.1 Eight letters were sent out to specialist consultees:
- Natural Resources Wales (NRW)
 - Cadw
 - Dwr Cymru Welsh Water (DCWW)
 - Neath Port Talbot as the Highways Authority
 - Neath Port Talbot as the Local Planning Authority
 - Mid and West Wales Fire and Rescue Service
 - Canals and River Trust
 - The Coal Authority
- 3.2 Seven responses were received by the deadline of 7th of November 2022. The responses are enclosed at Appendix D.
- 3.3 Table 3.1 overleaf provides a summary of all the matters raised from statutory consultees.

Table 3.1: Specialist Consultee Responses

Consultee	Summary of Comments	Developer Responses
Canals and River Trust	We have reviewed the pre-application consultation and based on the information available the Trust has concerns relating to the following issues, and we ask that further discussions take place prior to the submission of a formal application. Previously Glandwr Cymru objected to the proposal for housing on this site (P2019/5708 in our response dated 11.03.2020) as the applicant failed to provide sufficient evidence to allow the impact of the development on flood consequences, land stability and the restoration of the Swansea canal to be appropriately assessed. Previously we objected to the proposal as being contract to TAN15, Paragraph 6.9.23 of Planning Policy Wales 10 and Policies EN8 and BE3 of the adopted Neath Port Talbot Local Plan. It is noted that the same supporting documents are provided as part of this pre-consultation. Our comments relating to the lack of adequate supporting evidence therefore largely remains unchanged. The current proposal is for light/industrial/commercial units and the use of this site in this way does give less cause of concern, however we suggest a meeting with the applicant prior to the submission of a formal planning application is required. The site is located on land below the Swansea Canal which runs on an embankment for the length of the site. Since the Gilwern breach on the Monmouthshire 8 Brecon in 2007 the Trust have invested a lot of time and effort understanding and managing the risks associated with our canals and we have carried out work to model flood inundation below high consequence embankments. For information, the Swansea Canal embankment suffered a breach in 1998 very close to this site, with flood water causing nearby land, businesses and houses to flood. The embankment is owned by the applicant and supports both the canal and towpath.	An updated Flood Consequences Assessment (FCA) and Site Investigation Report have been included in the planning submission for the proposed industrial/commercial development at Old Foundry Road to assess the impact on flood consequences, land stability and restoration. The FCA has been amended from PAC to include updated planning policy and new section on fluvial flood modelling. TAN 15 states that <i>'flood defences must be shown by the developer to be structurally adequate particularly under extreme overtopping conditions'</i>. The existing flood defences protect the town to a 1% annual exceedance probability (AEP) standard and are maintained by NRW to be structurally adequate. The proposed development will not impact the formal flood defences. The tow path raising is no longer required and this is reflected in the updated FCA (JQJ-JBAU-XX-XX-RP-Z-0001-S1-P01.0-Old_Foundry_Road_FCA) attached to this planning application. Section 5.2.1 states that <i>'the finished site ground level is to be raised to 32.8m AOD, lowering slightly to 32.7m AOD to the south-east where landscaping is proposed. The proposed buildings raised ~150mm above this level. On this basis, the post-developed model scenario was simulated for the 1% AEP plus climate change and 0.1% AEP events'</i>. The site sections submitted as part of the planning application demonstrate that the revised scheme has less impact on the existing slope. The site is being raised so will help the stability

Technical Advice Note 15: Development and Flood Risk (TAN 15) identifies flood risk from canals in section 11.24 - 11.25 and identifies the need to consider their capacity to cause local flooding where overflow channels fail to operate, or an embankment fails or is breached.

The applicants discussed the consequences of a breach of the canal above the site with the Trust during the course of the previous application and as a result a flood consequence assessment was provided which takes some account of flooding from this type of event.

Previously the FCA was written on the premise that the canal towpath could be raised by up to 500mm to prevent overtopping. It is not clear if that is still the intention, but it is not mentioned on any of the submitted drawings, and it appears that there is no intention to alter the towpath or the canal embankment. This should be clarified. If the towpath is not to be raised this minimises the impact of the proposal on the embankment but does not overcome concerns relating to flooding in the event of a breach or overtopping event.

Glandwr Cymru previously agreed that the modelling that was carried was in accordance with our guidance, but it should be noted that the modelling results are for a blue sky event'. i.e., what could happen if the embankment itself failed with normal (non-flood) levels of water in the canal. The modelling including the raising of the towpath.

If the towpath is not now to be raised, the canal overtops or if there was a failure of water control infrastructure, then low peak flows and the duration of flows to the site could be significantly different to that indicated in the flood modelling. This was the case in the 1998 breach adjacent to this site, and as a result the flood water levels, extent and damage was greater than the submitted modelling indicates. The applicants should clarify their intentions and re-run the

of the bank and that the site still slopes downwards from west to east thus helping run off should a breach occur.

A drainage concept plan (14834_510_r02 - Drainage Concept Plan) has been created and will support the final planning application, as a result of these comments.

modelling if the parameters have altered prior to the submission of the formal application.

Site earthworks can be used to divert flows away as raising the towpath only moves the problem. Potential management of inflows may provide the best mitigation. In order to fully understand the impact of the proposal, further information will be required, such as additional cross sections, detailed drainage plan and construction methodology for works at the toe of the embankment.

Historically, there are occurrences where canal embankments suffer from leakage. The applicants should carry out a full investigation of the site prior to determination and this may indicate a need to undertake permanent repairs to the canal or embankment to minimise the risk of leakage in the future. Dependent on the findings of this investigation, the Trust may wish to seek a contribution towards the cost of permanent mitigation or additional inspections of our asset in line with the advice given in TAN 15.

Current planning guidance requires planning authorities to take into account the nature, scale and extent of ground instability. It recognises that slopes and embankments can be put at risk from inappropriate neighbouring development, and where relevant, land stability should be addressed, and appropriate mitigation measures secured to protect both existing assets and proposed development itself.

The plans suggest the developer will excavate foundations into the lower levels of the embankment. Any construction works or alterations to the ground profile could potentially destabilise the embankment and increase the likelihood of failure, resulting in the collapse of the towpath and possible breach of the canal.

The submitted cross sections appear to indicate that the impact of the proposed industrial units is less than that previously shown for the houses, however additional cross

sections throughout the site would be of assistance, as well as further details regarding the piled foundations.

The CEMP largely deals with the impact of the proposal on neighbouring properties. A more detailed section on protection of the canal embankment during works, would be of assistance.

It appears from the site investigation report that trial pits and bore holes carried out recently and in 2006 have not investigated the canal embankment. The site investigation report recommends that 'a stability assessment or similar is completed on the north of the site prior to redevelopment'. The report states that, when engineering levels are understood, an assessment of the temporary works and permanent works required to ensure the short, medium and long-term stability of the bank and canal is maintained should be completed. This report requires updating.

In order to understand the impact of the ground re-modelling and the temporary and permanent works, a geotechnical survey of the embankment, a slope stability analysis and details of foundation design within the zone of influence of the embankment will all be required prior to the submission of a formal planning application as both the stability of the embankment and further work to assess flood flows could have an impact on the site layout and viability.

The length of canal adjacent to the site is safeguarded under Policy BE3 1.b of the adopted local plan which states:

"Proposals which would prejudice the conservation, restoration and operation of these safeguarded lengths of canal will be restricted. Proposals will need to demonstrate that they would not adversely affect the setting of the canal or prevent or discourage the use of the canal for recreation and water supply."

As mentioned above, it is not clear if it the applicant's intention to raise the towpath by 50mm or whether the various reports need to be updated to remove reference to this. Doing so will have an impact on the freeboard of the canal (the distance between the water level and the towpath level) which could prevent this area of canal being used recreationally in the future. The height difference would be too great to allow safe access for canoeists etc. Increasing the use of the canal for non-motorised water sports is an aspiration of both the Swansea Canal Society and Glandwr Cymru as the next stage in the restoration of the canal.

Any failure in the embankment as a result of this proposal could result in the loss of water in the canal, leading not only to the flooding of the site and surroundings but an impact on businesses within the area who rely on a supply of water from the canal. Without further information on the physical impact of this proposal on the canal towpath and embankment it must be assumed that the proposal does not comply with policy BE3.

Drainage

It is noted that surface water from block B will be collected and taken to the front of the site. This should be discussed further with Glandwr Cymru however it is expected that this will help minimise de-stabilisation of the embankment as a result of ground saturation and so this should be fully considered as part of the slope stability analysis. The details of the drainage area/channel at the rear does however require further clarification.

Future Management, Maintenance and inspection

Previously the Trust was concerned that the proposed retaining would not be owned or maintained by the Trust but will remain responsible for holding up our asset, the canal and towpath. If the change to industrial/commercial use means that the embankment will remain under the care of a single management company that would be beneficial, but this needs clarification.

The embankment is currently assessed on a bi-monthly basis, as regardless of the fact that it is not owned by Glandwr Cymru we wish to ensure that it is not likely to cause a breach in our canal. Following further investigations to be carried out by the applicant and agreement as to the scope of any additional mitigation as a result of this and of the change of use of the land the frequency of inspections may need to increase.

It is suggested that a suitable access agreement is put in place. As mentioned above a contribution may be sought if additional inspections of their embankment are considered necessary as a result of this proposal.

Any new planting or the removal of existing planting and boundary treatments may affect our ability to inspect the high-risk structure as well as destabilise the embankment. It is noted that the Arboricultural report also appears to relate to the previous proposal and may need updating.

It is suggested that a full landscaping plan is required as part of the formal planning application, not only to understand the impact on the embankment and ability to assess it, but also to properly understand the impact of the proposal when viewed from the canal.

Accessibility

It is noted that the canal towpath is not recognised as a sustainable active travel route, not is an access suggested to it. The Council in conjunction with Glandwr Cymru promote the towpath as a sustainable off-road transport route and work is currently being undertaken elsewhere on the towpath to improve it as a sustainable Active Transport route. The Active Travel (Wales) Act 2013, TAN: 18 (Transport) and Welsh Office Circular 13/97 Planning Obligations) all suggest that planning authorities may use planning obligations to secure improvements to an active travel route.

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Conclusion

Whilst the proposal use may give Glandwr Cymru less cause for concern than the original residential proposal, the pre-application as submitted does not provide enough detail to properly assess the proposal in terms of its impact on our asset, the Swansea Canal. Much of the supporting information is possibly now out of date and related to the previous residential proposal, and as such may require refreshing.

We request that a meeting take place to determine the level of additional detail required to allow a proper consideration of the proposal prior to the submission of a formal application.

Mid and West
Wales Fire and
Rescue Service

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 comments from Mid and West Wales Fire and Rescue Service have been noted and implemented as part of the planning application.

- are identified, in relation to the proposed developments, together with suggestions as to how these can be addressed.
- 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 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>

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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).

Cadw

Thank you for your letter of 6 October inviting our comments on the pre-planning application consultation for the proposed development described above.

The comments from Cadw have been noted, in preparation of the planning application.

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 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 is set out in Annex A.

Assessment

Scheduled Monuments

GM342 Standing Stones 300m W of Cefncelfi
GM400 Waun y Coed Colliery Branch Canal and
Tramroad Incline
GM514 Burial Chamber at Pen-yr-Alltwn

This pre-planning application is for Light industrial/commercial units and works at Land to the North of Old Foundry Road, Pontardawe.

The above designated historic assets are located inside 2km of the proposed development, but intervening topography, buildings and vegetation block all views between them. Consequently, the proposed development will have no impact on the settings of these designated historic assets.

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

The Coal Authority

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.

The comments from the Coal Authority have been noted. There are no actions required for the planning application.

Neath Port Talbot County Borough Council Highways

No highway objection in principle to the proposals submitted on drawing number 1618:PAC 04 and the supporting documents submitted as part of this application consultation process. These comments however, are subject to any subsequent planning application submission being compliant with the following documents and inclusive of the guidance conditions below:-

An access plan (14834_700_r03 - Vehicle & Pedestrian Access Scheme) and vehicle tracking plan (14834_900_r04 – VT) have been created to demonstrate compliance with the NPTCBC SPG Parking Standards (2016). These plans will support the final planning application.

- 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 car parking allocation as detailed within this pre application consultation is in compliance with NPTCBC SPG Parking Standards (2016). The units are single storey and allocated with three parking spaces.

The access to the site is compliant with a width of 6.1 meters. The access is designed with a 6 meter radius which is substandard, but the vehicle tracking supplied with the application shows that the appropriate vehicles can enter and exit the development.

Bin storage facilities are compliant with accessibility of waste collection vehicles. The vehicle tracking supplied shows that a refuse vehicle can manoeuvre the site.

The development is compliant in maximising walking and cycling accessibility by including two cycling storage facilities. A pedestrian route to an active travel link has also been included in the development.

Vision splays of 2.4m by 90m onto existing public highways must be achieved. Pedestrian vision splays of 2.4 metres by 2.4 metres (measured back from back of footway) shall be maintained each side of each vehicular access within which nothing over 600mm in height shall be erected or allowed to grow and shall be retained as such thereafter.

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 SP2022.0010.

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 or 01639 686850.

NOTES TO APPLICANT

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.

Dwr Cymru
Welsh Water

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into

The comments from Dwr Cymru Welsh Water have been noted. There are no actions required for the planning application.

account within any future planning application for the development.

SEWERAGE

I 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 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

The foul flows only from the proposed development can be accommodated within the public sewerage system.

You are 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 you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that 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

A water supply can be made available to service this proposed development. Initial indications are that a connection can be made from the 6" diameter CI watermain in 272562, 204117 location. The cost of providing new on-site watermain can be calculated upon the receipt of detailed site layout plans which should be sent to the above address.

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

Natural
Resources Wales

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, 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 unsuspected land contamination on any planning permission granted. Without the inclusion of this condition by the planning authority we would be likely to object to the planning application.

Flood Risk

The planning application proposes highly vulnerable development. Our Flood Risk Map confirms the site to be within Zone C1 of the Development Advice Map (DAM)

An amended FCA for an industrial/commercial use supports the planning application. This is an updated version of the previous 2019 FCA which related to a proposed residential development at the same location.

Detailed hydraulic modelling has been used as part of the assessment and mitigation measures have been recommended as a result of the modelling exercise.

Section 7 mitigation measures and the subsequent conclusions and recommendations of the FCA, demonstrate that the risks and consequences of flooding can be managed to an acceptable level.

The condition on land contamination has been noted and accepted.

contained in TAN15 and the FMfP identifies the application site to be at risk of flooding and falls into Flood Zone 3 Rivers and Sea.

The details and procedures of submitted CEMP will be implemented throughout the course of the development and beyond.

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 Flood Consequences Assessment (FCA) that the potential consequences of flooding can be managed to an acceptable level.

An updated 2023 Preliminary Ecological Appraisal (PEA) supports the planning application. The walk over and provisional roost assessment were carried out on the 12th January 2023 to provide updated survey results. Please see the attached PEA for the results.

We have reviewed the submitted FCA, produced by JBA Ltd., Dec 2019, Ref. 2018s1312_Holly Street FCA v4.0.docx. 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 FCA is based on an application for residential with a different footprint. The FCA needs to be updated/redone to include the industrial units. In addition, upon receipt and review of any submitted FCA, we may request the submission and review of any hydraulic model which is used to inform the FCA.

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 would object to this application.

Land Contamination

We welcome the submission of the Site Investigation Report, referenced 12360/RAH/19/SI and note its content. On our assumption that gross contamination is not present at this location we offer no adverse comments in respect of the potential impacts on controlled waters, however, the requested unsuspected contamination condition should be

included within any permission granted. We also advise that the requirements of Planning Policy Wales and the Guiding Principles for Land Contamination (GPLC) are followed.

Condition: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with.

Pollution Prevention

Given the proximity of the site to the adjacent canal, all appropriate pollution control measures must be adopted on site during site clearance and construction to ensure the integrity of controlled waters. We have reviewed the Construction Environmental Management Plan (CEMP), reference 1618:PL:CEMP, prepared by Kennedy James Griffiths and offer no adverse comments. Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works and maintenance in or near water' and 'Working at construction and demolition sites'.

Ecology

We have reviewed the Preliminary Ecology Report prepared by Hawkswood Ecology, July 2019, however we note that the survey information is over 2 years and is now out of date. We are unable to provide comments until the surveys have been updated.

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

Adjoining Land Owner/Occupier and Community Councillors Consultation Responses

- 3.4 Of the 190 notice letters sent out, 182 were owner/occupiers and six responded. Table 3.2 below provides a summary of all the matters/issues raised during the consultation process and how the developer has addressed these issues.
- 3.5 Of the 182 letters sent out, two were returned as undeliverable.

Third Party Representations

- 3.6 During the 28-day PAC period no third-party representations were received in respect of the PAC development proposals.

Table 3.1: Adjoining Land Owner/Occupier, Elected Members and Local Interest Group Consultation Responses

Themes	Developer Response
Noise Levels	Level impacting on the proposed site during the daytime period are being mitigated as far as feasible with a 2.5m high (above site level) close boarded timber fence/masonry wall or combination of them both along the site boundary. This barrier should have a minimum mass of 10 Kg/m2 with no gaps.
Pollution	The attached CEMP deals with pollution prevention and demonstrates how relevant Guidelines for Pollution Prevention and best practice will be implemented. All vehicles on site are to switch off engines and are not to 'idle' on site. This will reduce noise and minimise potential air pollution.
Additional Traffic	The attached CEMP deals with traffic management (Section 5.1) under specific mitigation measures.
Benefits to Local Residents	The Proposal is designed to be accessible to all. The site is accessible by car, cycle, walking and is close to public transport connections providing a range of transport options for potential residents. The site is also close to local amenities reducing reliance on the car and the number of trips generated by the proposed development, all in accordance with Policies of the Local Plan.
Impacts on Wildlife	The attached PEA provides a list of recommendations (Section 9) for the proposed development to mitigate any adverse impact on the local wildlife. This includes the retention of trees, shrubs and vegetation to preserve bird nests and bats. Bat tubes and bird boxes will also be used. Any species around the canal embankment have also been considered and further survey work will be undertaken, should any species be sited in the area. The attached CEMP also covers pollution or contamination prevention to the adjacent SINC and the hedgerow and tree roost protection zones.
Impact on the Canal	The attached Design and Access Statement (DAS) seeks to provide a layout that is sensitive to its surroundings, including the canal. All existing trees and footpaths/towpaths along the canal embankment will be retained, meaning the use of canal will not be hindered by the development. Flood prevention measures will also be applied to retain the use of the canal towpath as a recreational route.
Use of Brownfield Land	The proposed development constitutes new industrial facilities adjacent to the existing Alloy Industrial Estate (predominantly B1, B2 and B8 use). The development seeks to make best use of an area of vacant brownfield land situated in amongst similar building types and activities/uses on the estate. The application site comprises previously developed land which falls within the defined LDP settlement limits. The application offers the opportunity to transform a currently vacant, brownfield site into a modern extension to an existing industrial area, creating a new, high quality supply in the local market. PPW sets out the preference for the use of previously developed land and buildings, including the use of vacant or underused land, commercial property in and around settlements. This is clearly demonstrated by this proposal.
Construction Programme	The current expectation is that construction of the proposed development would take approximately 68 weeks. The works will commence at the end of March 2023 with an anticipated completion date of July 2024, although this may change subject to date of obtaining planning consent. The proposed site working hours are therefore: (i) Construction Hours No development, (including land raising and demolition if required) shall be carried out other than between the hours of 08.00 and 18.00 Monday to Friday and between the hours of 08.30 and 13.00 on Saturdays.

PRE-CONSULTATION REPORT

Should any works that will produce significant noise be required during construction the contractor is to contact the Local Authority Environmental Health Officer to agree suitable start times which are likely to be later than the 7.30AM for general works. (iii) Prior Approval - Out of Hours Prior approval will be required for any construction to take place outside permitted times and on Sundays and Bank Holidays, where it would create noise audible at the boundary of any residential property.

For more information on the construction programme, please paragraph 2.2 of the attached CEMP.

Principle of Development

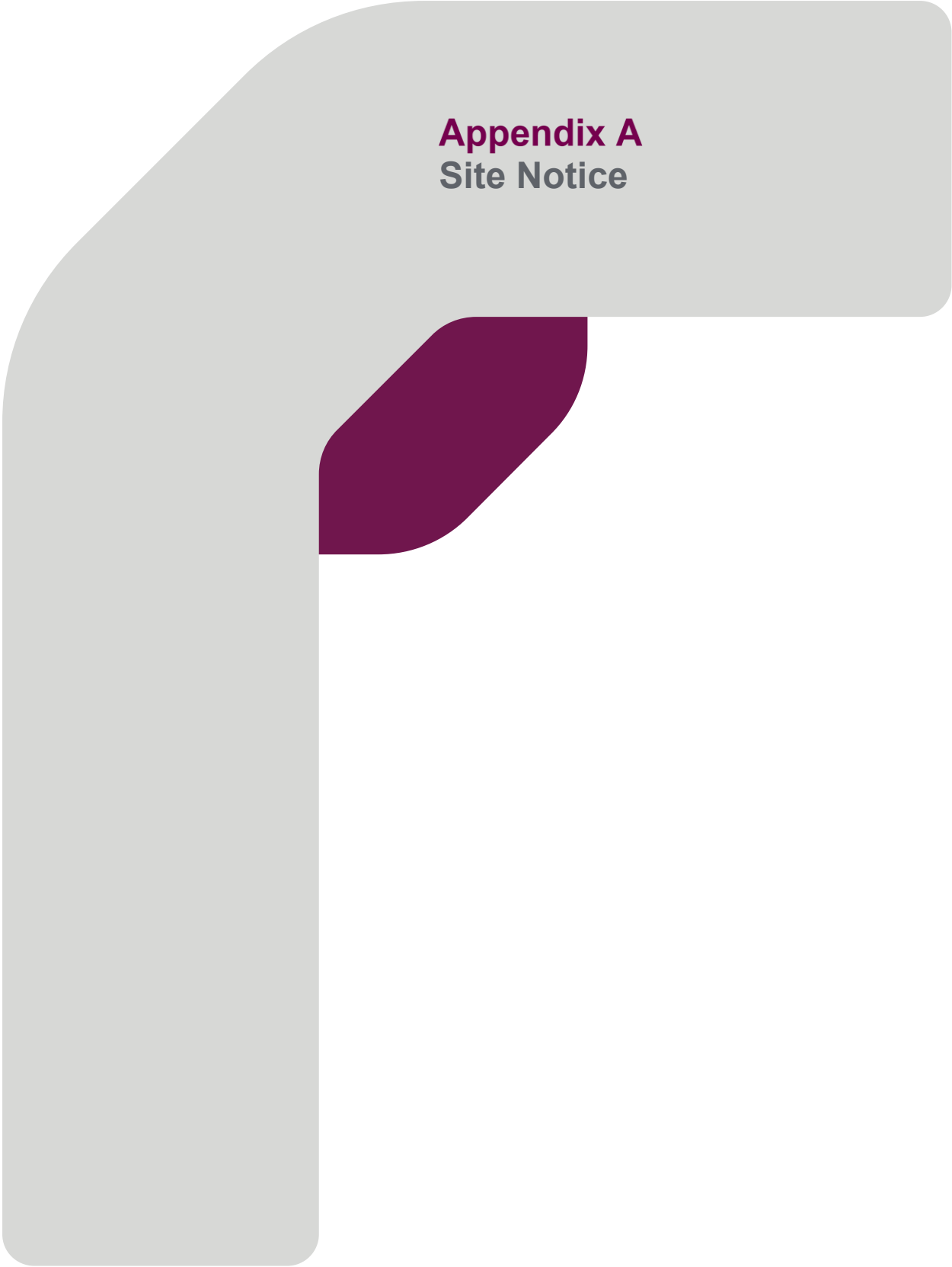
The principle of this development is established given that the site is adjacent to an area allocated for employment use (Policy EC2/18 Alloy Industrial Estate) within the adopted LDP, as indicated on the Proposals Map. The application site's proximity to the LDP employment allocation and its position within the natural boundary of the wider industrial estate area, means the proposed development is considered entirely appropriate to its location.

4 DEVELOPER RESPONSE TO CONSULTATION RESPONSES

- 4.1 As a result of the consultation and the representations received, no concerns/issues were raised that require the amendment of the proposal.
- 4.2 It is concluded that the applicant has complied with the requirements of the Town and Country Planning (Development Management Procedure) (Wales) (Amendments) Order 2016, in respect of pre-application consultation requirements.

5 CONCLUSIONS

- 5.1 This PAC report provides a copy of the relevant notices/letters, as well as a summary of responses received from all consultees.
- 5.2 No objections were made by any of the specialist consultees. Responses have however been provided to all matters raised in Table 3.1.
- 5.3 No objections were received from owner/occupiers of adjoining land or community councillors, just a single request for clarification. A developer response to that representation has been provided in Table 3.2.
- 5.4 In conclusion, this report documents the way in which the applicant has addressed the PAC requirements outlined and sets out the responses to matters raised during the pre-application consultation process.



Appendix A Site Notice

SCHEDULE 1 Article 4(4)
Pre-application notices
SCHEDULE 1B Articles 2C & 2D

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING
PERMISSION

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

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

(to be served on owners and/or occupiers of adjoining land and community consultees; and displayed
by site notice on or near the location of the proposed development)

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 to the North of Old Foundry Road, Pontardawe**

I give notice that **Bluefield Land Ltd**

is intending to apply for planning permission for: **The Development of light industrial/commercial units (Use Class B2/B8) with associated parking, servicing, hard and soft landscaping and drainage infrastructure**

You may inspect copies of:

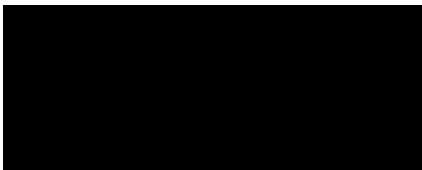
- the proposed application;
- the plans; and
- other supporting documents

online at <https://www.oldfoundryroad-pac.co.uk> and computer facilities are available to view this information online at: **Pontardawe Library, Holly Street, Pontardawe, Swansea, SA8 4ET** during normal opening hours.

Anyone who wishes to make representations about this proposed development must write to the agent **Damian Barry at RPS, 2 Callaghan Square, Cardiff, CF10 5AZ**

By: **7th November 2022**

Signed:

A large black rectangular box redacting the signature of the agent.

Date: 7th October 2022

ATODLEN 1 Erthygl 4.(4)
Hysbysiadau cyn-ymgeisio
ATODLEN 1B Erthyglau 2C a 2D

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM
GANIATÂD CYNLLUNIO Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu)
(Cymru) 2012

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO
HYSBYSIAD O DAN ERTHYGLAU 2C A 2D

(i'w gyflwyno i berchnogion a/neu feddianwyr tir cyffiniol ac ymgynghoreion cymunedol; ac i'w
arddangos drwy hysbysiad safle ar neu gerllaw lleoliad y datblygiad arfaethedig)

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 i'r Gogledd o Old Foundry Road, Pontardawe**

Rwyf yn hysbysu bod **Bluefield Land Ltd**

yn bwriadu gwneud cais am ganiatâd cynllunio ar gyfer: **Datblygu unedau diwydiannol/masnachol
ysgafn (Dosbarth Defnydd B2/B8) gyda meysydd parcio, gwasanaethu, tirlunio caled a meddal a
seilwaith draenio cysylltiedig.**

Gellwch archwilio copïau o'r canlynol:

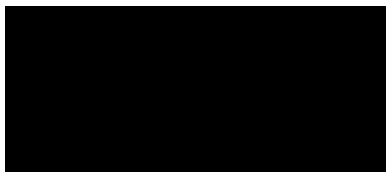
- y cais arfaethedig;
- y planiau; a
- dogfennau ategol eraill

ar-lein yn <https://www.oldfoundryroad-pac.co.uk> ac maecyfleusterau cyfrifiadur ar gael i
archwilio'r wybodaeth hon ar lein yn **Pontardawe Library, Holly Street, Pontardawe,
Swansea, SA8 4ET** yn ystod oriau agorarferol.

Mae'n rhaid i unrhyw un sy'n dymuno gwneud sylwadau ynglŷn â'r datblygiad arfaethedig hwn
ysgrifennu at y yr asiant **Damian Barry RPS, 2 Sgwar Callaghan, Caerdydd, CF10 5AZ**

Erbyn **7fed Tachwedd 2022**

Llofnod:



Dyddiad: 7fed Hydref 2022

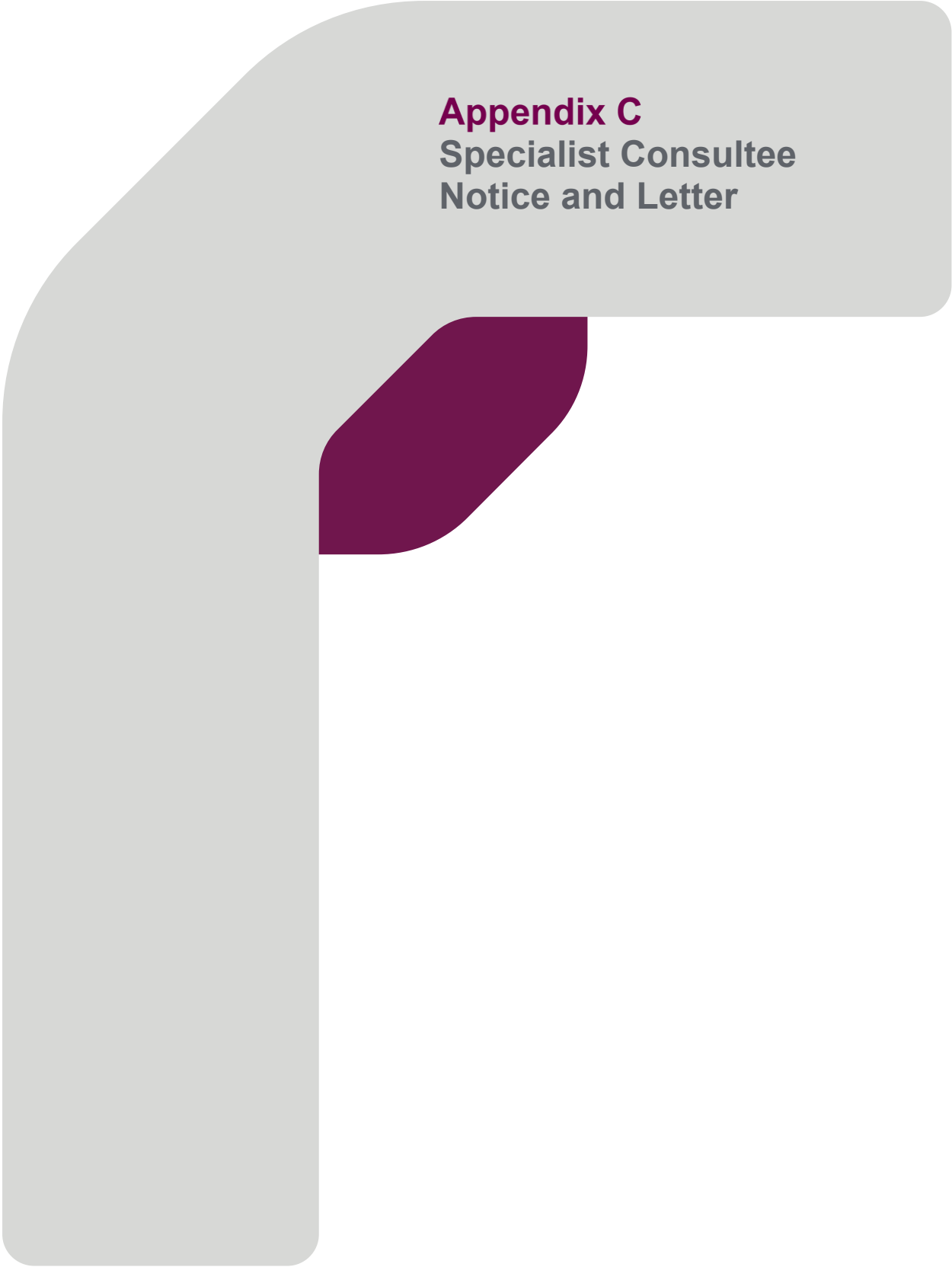


Appendix B

Owner/Occupier and Community Councillor Consultee List

	Ward / Company Name	Address Line 1	Address Line 2	Address 3	Address Line 4	Town/City	Postcode	Email Address	
Community Council									
Councillor Heath Davies	Plaid Cymru - Pontardawe	82 Parc Gilbertson	Gelligrn	Pontardawe		Swansea	SA8 4PU		
Councillor Anthony John Richards	Plaid Cymru - Pontardawe	Port Talbot Civic Centre		Port Talbot		Port Talbot	SA11 1PJ		
Councillor Linet Purcell	Town Mayor - Pontardawe Town Council	39 New Road	Ynysmeudwy	Pontardawe		Swansea	SA8 4PJ		
Councillor Rebecca Phillips	Deputy Town Mayor - Pontardawe Town Council	9 Maes Rhosyn		Pontardawe		Swansea	SA8 3HT		
Councillor Gary Davies	Pontardawe Town Council	7 Bryn Onnen		Pontardawe		Swansea	SA8 4LH		
Councillor Dai Brain	Pontardawe Town Council	20 Clos y Cwm		Pontardawe		Swansea	SA8 1JZ		
Councillor Meirion Davies	Pontardawe Town Council	2 New Road	Ynysmeudwy	Pontardawe		Swansea	SA8 4PU		
Councillor Bledwyn Howells	Pontardawe Town Council	11 Bryn Onnen		Pontardawe		Swansea	SA8 4LH		
Councillor Jill Lord	Pontardawe Town Council	17 Uplands Road		Pontardawe		Swansea	SA8 4AH		
Councillor Anthony Richards	Pontardawe Town Council	197 Bryn Morgrug	Alltwn	Pontardawe		Swansea	SA8 3BE		
Councillor Matthew Vincent	Pontardawe Town Council	8 Clos y Cwm		Pontardawe		Swansea	SA8 4JZ		
Councillor Jamie Nemeth	Pontardawe Town Council	7 Lon Dea		Pontardawe		Swansea	SA8 4LZ		
Councillor Heath Davies	Pontardawe Town Council	82 Parc Gilbertson	Gelligrn	Pontardawe		Swansea	SA8 4PU		
Owner/Occupier									
Owner/Occupier	Heat Pump Services Ltd	38 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		Unit 3	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier		Unit 7	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier		Unit 5	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier		Unit 10	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier		Unit 3B	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier		Unit 1	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier		Unit 6	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier		Unit 4C	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier		Unit 7	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier		Unit 1	Gilbertson Court	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier		Unit 3	Gilbertson Court	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier		Unit 10	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier		Unit 11	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier		Unit 8	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier		Unit 9	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier		A & M Garages Ltd	Unit 1	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier		Afon Veterinary Centre	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EN		
Owner/Occupier		All Revved Up Motorcycles	Unit 3A	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN	
Owner/Occupier		Fabricator Ltd	Unit 5	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN	
Owner/Occupier		Group 4 Engineering	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EN		
Owner/Occupier	Inflatable Testing Wales	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EN			
Owner/Occupier	J & L Packaging	Unit 2C	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier	L L I W Building Supplies	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EN			
Owner/Occupier	Liquid Paintwork	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EN			
Owner/Occupier	N P T C Group of Colleges	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EN			
Owner/Occupier	Osborne Jones Property Care Ltd	Ema Evans Business Centre	Alloy Industrial Centre	Pontardawe	Swansea	SA8 4EN			
Owner/Occupier	Pontardawe MOT Centre	Unit 7	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier	Pontardawe Primary Care Centre	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4JU			
Owner/Occupier	Quad Bikes Wales	Unit 2	Gilbertson Court	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier	Rostls Canning Brett Ltd	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EP			
Owner/Occupier	Rowan Gas	Unit 6	Ema Evans Business Centre	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EN		
Owner/Occupier	Royal Mail	Pontardawe Delivery Office	Alloy Industrial Centre	Pontardawe	Swansea	SA8 4EL			
Owner/Occupier	Slice & Dice Pontardawe Ltd	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EN			
Owner/Occupier	Sues Café	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EN			
Owner/Occupier	The Box Yard	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4EZ			
Owner/Occupier	Trade Mate	Unit 9	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier	Trade Mate	Unit 8	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier	Wall Colmonoy Ltd	Alloy Industrial Estate		Pontardawe	Swansea	SA8 4HL			
Owner/Occupier	Welsh Auctions	Unit 4	Cwmataw Business Park	Alloy Industrial Estate	Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier	Westward Energy Services Ltd	Energy House	Alloy Industrial Centre	Pontardawe	Swansea	SA8 4EN			
Owner/Occupier	Neath Port Talbot Council	Alloy House	Tawe Terrace		Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		39 Ynys Y Mond Road	Alltwn		Pontardawe	Swansea	SA8 3BA		
Owner/Occupier		Cwmataw Business Park			Pontardawe	Swansea	SA8 4EZ		
Owner/Occupier		1 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		2 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		3 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		4 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		5 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		5 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		6 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		7 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		8 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		9 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		10 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		11 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		12 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		13 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		14 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		15 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		16 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		17 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		18 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier	A & A Services (Wales) Ltd	19 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		20 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		21 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		22 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		23 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		23 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		23 Tawe Terrace			Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		Brother Engineering	Alloy House	Tawe Terrace		Pontardawe	Swansea	SA8 4HA	
Owner/Occupier		Clee Thompsonkison Francis	Tawe Terrace		Pontardawe	Swansea	SA8 4HA		
Owner/Occupier		1 Fuller Street			Pontardawe	Swansea	SA8 4ES		
Owner/Occupier		2 Fuller Street			Pontardawe	Swansea	SA8 4ES		
Owner/Occupier		3 Fuller Street			Pontardawe	Swansea	SA8 4ES		
Owner/Occupier		4 Fuller Street			Pontardawe	Swansea	SA8 4ES		
Owner/Occupier		5 Fuller Street			Pontardawe	Swansea	SA8 4ES		
Owner/Occupier		6 Fuller Street			Pontardawe	Swansea	SA8 4ES		
Owner/Occupier		7 Fuller Street			Pontardawe	Swansea	SA8 4ES		
Owner/Occupier		8 Fuller Street			Pontardawe	Swansea	SA8 4ES		
Owner/Occupier		9 Fuller Street			Pontardawe	Swansea	SA8 4ES		
Owner/Occupier		24 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		27 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		28 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		29 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		30 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		31 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		32 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		33 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		34 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		35 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier		37 Thomas Street			Pontardawe	Swansea	SA8 4HD		
Owner/Occupier	West Wales Cycles	1 Arthur Terrace			Pontardawe	Swansea	SA8 4HE		
Owner/Occupier		2 Arthur Terrace			Pontardawe	Swansea	SA8 4HE		
Owner/Occupier		2 Arthur Terrace			Pontardawe	Swansea	SA8 4HE		
Owner/Occupier		4 Arthur Terrace			Pontardawe	Swansea	SA8 4HE		
Owner/Occupier		2 Clos Yr Hen Ysgol			Pontardawe	Swansea	SA8 4AZ		
Owner/Occupier		3 Clos Yr Hen Ysgol			Pontardawe	Swansea	SA8 4AZ		
Owner/Occupier		4 Clos Yr Hen Ysgol			Pontardawe	Swansea	SA8 4AZ		
Owner/Occupier		5 Clos Yr Hen Ysgol			Pontardawe	Swansea	SA8 4AZ		
Owner/Occupier		6 Clos Yr Hen Ysgol			Pontardawe	Swansea	SA8 4AZ		
Owner/Occupier		7 Clos Yr Hen Ysgol			Pontardawe	Swansea	SA8 4AZ		
Owner/Occupier		8 Clos Yr Hen Ysgol			Pontardawe	Swansea	SA8 4AZ		
Owner/Occupier		9 Clos Yr Hen Ysgol			Pontardawe	Swansea	SA8 4AZ		
Owner/Occupier		10 Clos Yr Hen Ysgol			Pontardawe	Swansea	SA8 4AZ		
Owner/Occupier		2 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		3 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		4 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		5 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		6 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		8 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		10 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		12 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		14 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		16 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		18 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier	Peter Lynn Solicitors	20 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		21 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		29 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		31 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		33 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		35 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		37 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		38 Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		6A Holly Street			Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		Neath Port Talbot County Borough Council	Gastell-Nedd Port Talbot	Holly Street	Pontardawe	Swansea	SA8 4ET		
Owner/Occupier		Neath Port Talbot County Borough Council	Pontardawe Library	Holly Street	Pontardawe	Swansea	SA8 4HQ		
Owner/Occupier		28 George Street			Pontardawe	Swansea	SA8 4HQ		
Owner/Occupier		29 George Street			Pontardawe	Swansea	SA8 4HQ		
Owner/Occupier		30 George Street			Pontardawe	Swansea	SA8 4HQ		
Owner/Occupier		31 George Street			Pontardawe	Swansea	SA8 4HQ		
Owner/Occupier		32 George Street			Pontardawe	Swansea	SA8 4HQ		
Owner/Occupier		33 George Street			Pontardawe	Swansea	SA8 4HQ		

Owner/Occupier	5 Woodland Road			Pontardawe	Swansea	SA8 4HJ
Owner/Occupier	6 Woodland Road			Pontardawe	Swansea	SA8 4HJ
Owner/Occupier	7 Woodland Road			Pontardawe	Swansea	SA8 4HJ
Owner/Occupier	8 Woodland Road			Pontardawe	Swansea	SA8 4HJ
Owner/Occupier	10 Woodland Road			Pontardawe	Swansea	SA8 4HJ
Owner/Occupier	11 Woodland Road			Pontardawe	Swansea	SA8 4HJ
Owner/Occupier	Flat 1	Ty Haf	Grove Road	Pontardawe	Swansea	SA8 4HH
Owner/Occupier	Flat 2	Ty Haf	Grove Road	Pontardawe	Swansea	SA8 4HH
Owner/Occupier	Flat 3	Ty Haf	Grove Road	Pontardawe	Swansea	SA8 4HH
Owner/Occupier	Flat 4	Ty Haf	Grove Road	Pontardawe	Swansea	SA8 4HH
Owner/Occupier	Belton Cottage	Grove Road		Pontardawe	Swansea	SA8 4HH
Owner/Occupier	Y Mans	Y Mans	2 Grove Road	Pontardawe	Swansea	SA8 4HH
Owner/Occupier	Y Mans	2 Grove Road		Pontardawe	Swansea	SA8 4HH
Owner/Occupier	4 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	5 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	6 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	7 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	8 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	9 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	10 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	11 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	12 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	13 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	14 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	15 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	17 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	18 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	19 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	20 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	21 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	25 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	26 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	27 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	28 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	32 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	34 Grove Road			Pontardawe	Swansea	SA8 4HH
Owner/Occupier	36 Grove Road			Pontardawe	Swansea	SA8 4HH



Appendix C

Specialist Consultee Notice and Letter

SCHEDULE 1C Article 2D
CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
Town and Country Planning (Development Management Procedure) (Wales) Order
2012

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
NOTICE UNDER ARTICLE 2D

(to be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012)

Purpose of this notice: this notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development at: **Land to the North of Old Foundry Road, Pontardawe**

I give notice that: **Bluefield Land Ltd**

is intending to apply for planning permission for: **The development of light industrial/commercial units (Use Class B2/B8) with associated parking, servicing, hard and soft landscaping and drainage infrastructure.**

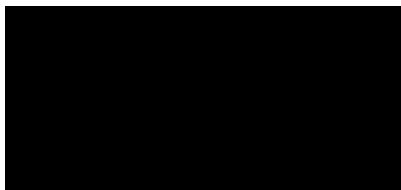
A copy of the proposed application; plans; and other supporting documents can be viewed online at <https://www.olfoundryroad-pac.co.uk>

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to the agent:

Damian Barry
RPS
2 Callaghan Square
Cardiff
CF10 5AZ
info@oldfoundryroad-pac.co.uk

By: 7th November 2022

Signed:



Date: 7th October 2022

ATODLEN 1C Erthygl 2D
YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO
Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO HYSBYSIAD O DAN
ERTHYGL 2D

(i'w gyflwyno i ymgynghoreion arbenigol, fel y'u diffinnir gan erthygl 2(1) o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012.

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn ddeisyfiad ffurfiol am ymateb i ymgynghoriad cynymgeisio o dan erthygl 2D o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012.

Datblygiad arfaethedig yn **Tir i'r Gogledd o Old Foundry Road, Pontardawe**

Rwyf yn hysbysu bod **Bluefield Land Ltd**

yn bwriadu gwneud cais am ganiatâd cynllunio ar gyfer: **Datblygu unedau diwydiannol/masnachol ysgafn (Dosbarth Defnydd B2/B8) gyda maes parcio, gwasanaethu, tirlunio caled a meddal a seilwaith draenio cysylltiedig.**

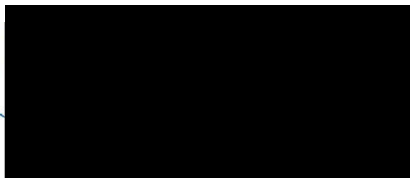
Mae copi o'r cais arfaethedig; planiau; a dogfennau ategol eraill wedi eu hatodi/ar gael i'w harchwilio ar lein yn <https://www.oldfoundryroad-pac.co.uk>

Yn unol â gofynion erthygl 2E o Orchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012, rhaid anfon ymateb i'r ymgynghoriad at:

Damian Barry
RPS
2 Sgwar Callaghan
Caerdydd
CF10 5AZ
info@oldfoundryroad-pac.co.uk

Erbyn **7fed Tachwedd 2022**

Llofnod:



Dyddiad: 7fed Hydref 2022

Our ref: JPW1985



Date: 06 October 2022

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Dwr Cymru Welsh Water
Developer Services
PO Box 3146
Cardiff
CF30 0EH

Dear Sir/Madam / Annwyl syr neu madam,

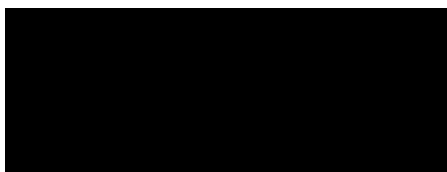
**Notice of Publicity and Consultation Before Applying for Planning Permission
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Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012**

In accordance with the above please find enclosed a Notice relating to a proposed planning application. *Yn unol â'r uchod, amgaeaf Hysbysiad i ymwneud a cais cynllunio arfaethedig.*

Should you require any clarification please do not hesitate to contact me. *Os bydd angen eglurhad arnoch mae croeso i chi gysylltu â mi.*

Yours faithfully / *Yr eiddoch yn gywir*
for RPS Consulting Services Limited / *Gwasanaethau Ymgynghori RPS Cyfyngedig*



DAMIAN BARRY
info@oldfoundryroad-pac.co.uk

Enc: As above / *Fel uchod*

Our ref: JPW1985



Date: 06 October 2022

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Highways Department
Neath Port Talbot CBC
Civic Centre
Port Talbot
SA13 1PJ

Dear Sir/Madam / Annwyl syr neu madam,

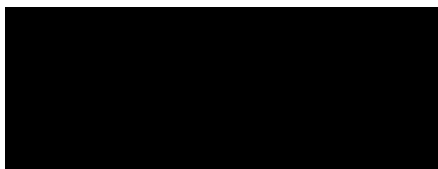
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Yours faithfully / *Yr eiddoch yn gywir*
for RPS Consulting Services Limited / *Gwasanaethau Ymgynghori RPS Cyfyngedig*



DAMIAN BARRY
info@oldfoundryroad-pac.co.uk

Enc: As above / *Fel uchod*

Our ref: JPW1985



Date: 06 October 2022

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Natural Resources Wales
Maes Newydd
Llandarcy
Neath Port Talbot
SA10 6JQ

Dear Sir/Madam / Annwyl syr neu madam,

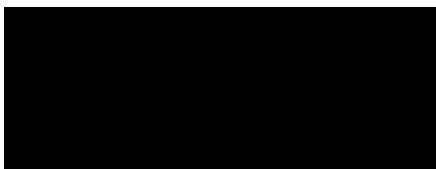
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Yours faithfully / *Yr eiddoch yn gywir*
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DAMIAN BARRY
info@oldfoundryroad-pac.co.uk

Enc: As above / *Fel uchod*

Our ref: JPW1985



Date: 06 October 2022

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Canal and River Trust
National Waterways Museum Ellesmere Port
South Pier Road
Ellesmere Port
Cheshire
CH65 4FW

Dear Sir/Madam / Annwyl syr neu madam,

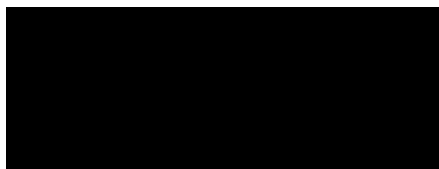
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Yours faithfully / *Yr eiddoch yn gywir*
for RPS Consulting Services Limited / *Gwasanaethau Ymgynghori RPS Cyfyngedig*



DAMIAN BARRY
info@oldfoundryroad-pac.co.uk

Enc: As above / *Fel uchod*

Our ref: JPW1985



Date: 06 October 2022

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Mid and West Wales Fire and Rescue Service
Service Headquarters
Lime Grove Avenue
Carmarthen
Carmarthenshire
SA31 1SP

Dear Sir/Madam / Annwyl syr neu madam,

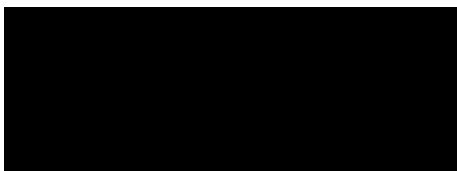
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Yours faithfully / *Yr eiddoch yn gywir*
for RPS Consulting Services Limited / *Gwasanaethau Ymgynghori RPS Cyfyngedig*



DAMIAN BARRY
info@oldfoundryroad-pac.co.uk

Enc: As above / *Fel uchod*

Our ref: JPW1985



Date: 06 October 2022

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

Planning Department
Neath Port Talbot CBC
Civic Centre
Port Talbot
SA13 1PJ

Dear Sir/Madam / Annwyl syr neu madam,

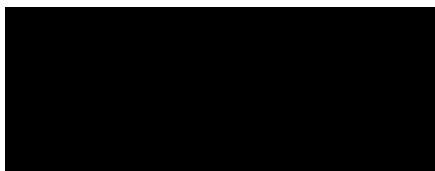
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Should you require any clarification please do not hesitate to contact me. *Os bydd angen eglurhad arnoch mae croeso i chi gysylltu â mi.*

Yours faithfully / *Yr eiddoch yn gywir*
for RPS Consulting Services Limited / *Gwasanaethau Ymgynghori RPS Cyfyngedig*



DAMIAN BARRY
info@oldfoundryroad-pac.co.uk

Enc: As above / *Fel uchod*

Our ref: JPW1985



Date: 06 October 2022

2 Callaghan Square
Cardiff
CF10 5AZ
T +44 2920 668 662

The Coal Authority
200 Lichfield Lane
Mansfield
Nottingham
NG18 4RG

Dear Sir/Madam / Annwyl syr neu madam,

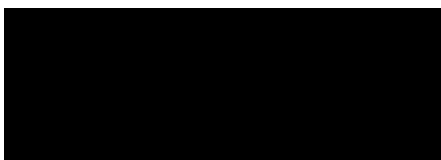
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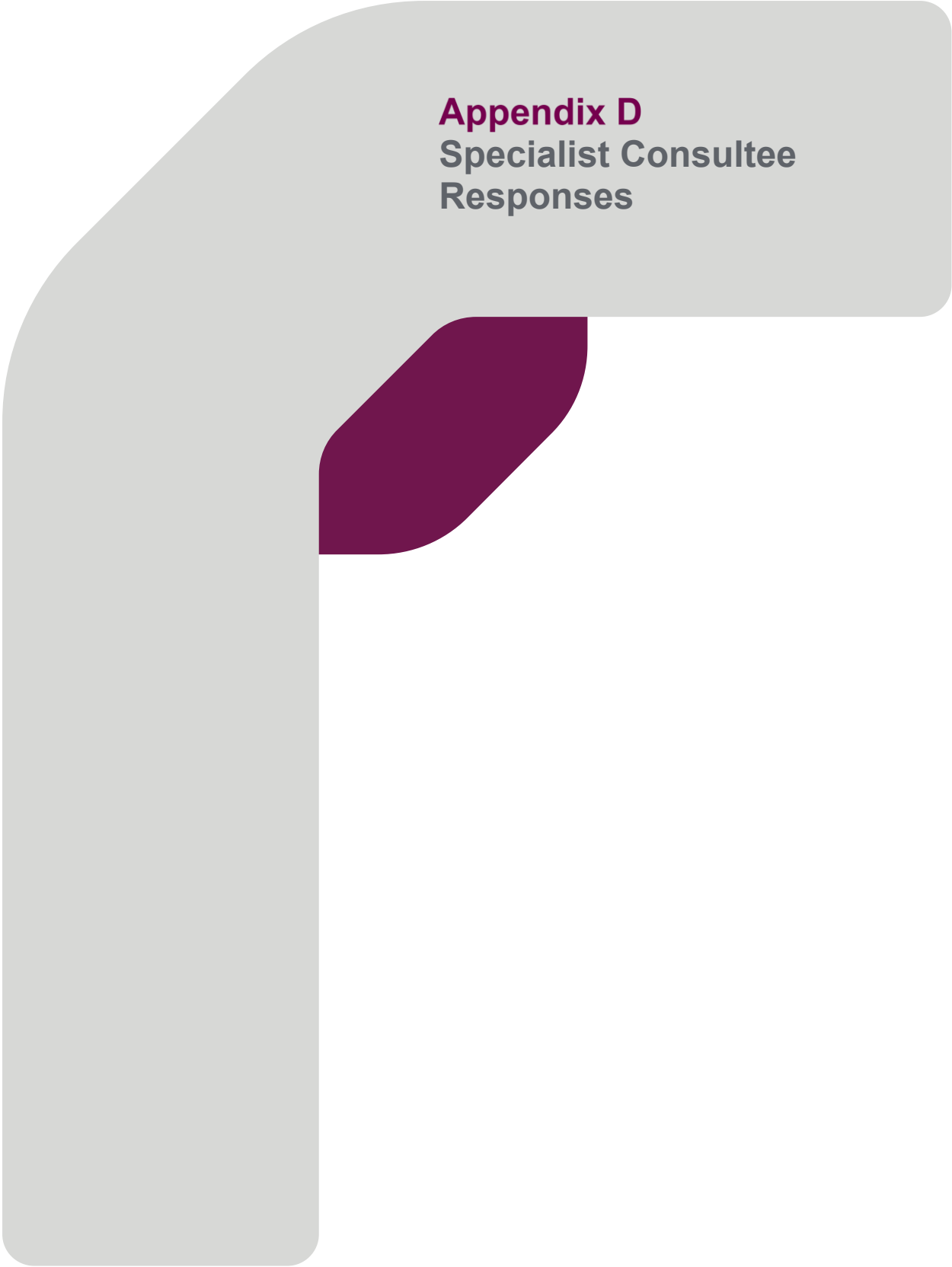
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Yours faithfully / *Yr eiddoch yn gywir*
for RPS Consulting Services Limited / *Gwasanaethau Ymgynghori RPS Cyfyngedig*



DAMIAN BARRY
info@oldfoundryroad-pac.co.uk

Enc: As above / *Fel uchod*



Appendix D

Specialist Consultee Responses

RPS Group Limited

By email:
info@oldfoundryroad-pac.co.ukEich cyfeirnod
Your reference

JPW1985

Ein cyfeirnod
Our reference

LC

Dyddiad
Date

14 October 2022

Llinell uniongyrchol
Direct line

0300 0256004

Ebost
Email:cadwplanning@gov.wales

Dear Sir/Madam

Pre-Planning Application - The development of light industrial/commercial units (Use Class B2/B8) with associated parking, servicing, hard and soft landscaping and drainage infrastructure, Land to the North of Old Foundry Road, Pontardawe

Thank you for your letter of 6 October 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 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 is set out in Annex A.

Assessment**Scheduled Monuments****GM342 Standing Stones 300m W of Cefncelfi
GM400 Waun y Coed Colliery Branch Canal and Tramroad Incline
GM514 Burial Chamber at Pen-yr-Alltwn**

This pre-planning application is for Light industrial/commercial units and works at Land to the North of Old Foundry Road, Pontardawe.

The above designated historic assets are located inside 2km of the proposed development, but intervening topography, buildings and vegetation block all views



between them. Consequently, the proposed development will have no impact on the settings of these designated historic assets.

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

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.



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

RPS
Consulting UK & Ireland
2 Callaghan Square
Cardiff
CF10 5AZ

*Gofynner am/
Please ask for:*

Rhif Est/Extn. No.

E-bost/E-mail:

Watch Manager G Morgan

bregs@mawwfire.gov.uk

FAO: Gemma Carrieri

Fy Nghyf/My Ref: GM/KDT/00231323

Dyddiad/Date: 10 October 2022

Dear Madam,

**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: Land North of Old Foundry Road, Pontardawe

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

- 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

Y Pencadlys, Heol Llwyn Pisgwydd, Caerfyrddin, Sir Gâr, SA31 1SP
Headquarters, Lime Grove Avenue, Carmarthen, Carmarthenshire, SA31 1SP

post@tancgc.gov.uk
mail@mawwfire.gov.uk

0370 60 60 699

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

MID AND WEST WALES FIRE AND RESCUE SERVICE

Advice on Water Supplies

1. WATER SUPPLIES FOR FIREFIGHTING

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to care for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Reference to the National Guidance Document on the Provision of Water for Fire Fighting 2007.

Access to Open Water Supplies

Where development of water-front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

1.1. HOUSING

Minimum main size 100 millimetres. Housing developments of units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.2. TRANSPORTATION

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100 millimetres. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

1.3. INDUSTRY

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any commercial industrial estate is as follows:

Light Industrial/Commercial

Up to one hectare, 20 litres per second - Minimum Main Size 100 millimetres

Up to two hectares, 35 litres per second - Minimum Main Size 150 millimetres

High Risk Industrial

Up to three hectares 50 litres per second - Minimum Main Size 150 millimetres

Over three hectares, 75 litres per second - Minimum Main Size 150 millimetres

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site if they are capable of supplying the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high-risk premises may require a greater flow.

1.4. SHOPPING, OFFICES, RECREATION AND TOURISM

Commercial developments of this type should have a water supply capable of delivering a minimum of 20 to 75 litres per second to the development site. The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and Single Storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

1.6. DISTANCES BETWEEN FIRE HYDRANTS

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates	-	150 metres
Town Centre Areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hostels	-	Adjacent to access
Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Home)	-	Adjacent to access
Old Persons Home	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

1.7. CONCLUSION

Developers should hold joint discussions with the relevant Water Authority or the Environmental Agency and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire.

The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site, as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.

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

Damien Barry
RPS
2 Callaghan Square
Cardiff
CF10 5AZ

ebost/email:
swplanning@cyfoethnaturiolcymru.gov.uk

07/11/2022

Annwyl Syr/Madam / Dear Sir/Madam,

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

BWRIAD / PROPOSAL: The development of light industrial/commercial units (Use Class B2/B8) with associated parking, servicing, hard and soft landscaping and drainage infrastructure.

LLEOLIAD / LOCATION: Old Foundary Road, Pontardawe,

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 6 October 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, 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 unsuspected land contamination on any planning permission granted. Without the inclusion of this condition by the planning authority we would be likely to object to the planning application.

Flood Risk

The planning application proposes highly vulnerable development. Our Flood Risk Map confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in TAN15 and the 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 Flood Consequences Assessment (FCA) that the potential consequences of flooding can be managed to an acceptable level

We have reviewed the submitted FCA, produced by JBA Ltd., Dec 2019, Ref. 2018s1312_Holly Street FCA v4.0.docx. 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 FCA is based on an application for residential with a different footprint. The FCA needs to be updated/redone to include the industrial units. In addition, upon receipt and review of any submitted FCA, we may request the submission and review of any hydraulic model which is used to inform the FCA.

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 would object to this application.

Land Contamination

We welcome the submission of the Site Investigation Report, referenced 12360/RAH/19/SI and note its content. On our assumption that gross contamination is not present at this location we offer no adverse comments in respect of the potential impacts on controlled waters, however, the requested unsuspected contamination condition should be included within any permission granted. We also advise that the requirements of Planning Policy Wales and the Guiding Principles for Land Contamination (GPLC) are followed.

Condition: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with.

Pollution Prevention

Given the proximity of the site to the adjacent canal, all appropriate pollution control measures must be adopted on site during site clearance and construction to ensure the integrity of controlled waters.

We have reviewed the Construction Environmental Management Plan (CEMP), reference 1618:PL:CEMP, prepared by Kennedy James Griffiths and offer no adverse comments.

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works and maintenance in or near water' and 'Working at construction and demolition sites' which are available on the following

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

Ecology

We have reviewed the Preliminary Ecology Report prepared by Hawkswood Ecology, July 2019, however we note that the survey information is over 2 years and is now out of date. We are unable to provide comments until the surveys have been updated.

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



**The Coal
Authority**

Resolving the **impacts** of mining

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

E: planningconsultation@coal.gov.uk
www.gov.uk/coalauthority

For the attention of Damian Barry
RPS

[By email: info@oldfoundryroad-pac.co.uk]

17 October 2022

Dear Damian

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

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

Proposed development at Land to the North of Old Foundry Road, Pontardawe

Thank you for your notification of 07 October 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



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

PLANNING APPLICATION NO: N/3/22/0011/00
APPLICANT: DAMIAN BARRY
LOCATION: LAND TO THE NORTH OF OLD FOUNDRY
ROAD, PONTARDAWE
PROPOSAL: LIGHT INDUSTRIAL/ COMMERCIAL UNITS (USE
CLASS B2/B8) WITH ASSOCIATED PARKING,
SERVICING, HARD AND SOFT LANDSCAPING
AND DRAINAGE INFRASTRUCTURE

The Highway 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	☐

MY OBSERVATIONS ON THIS PAC PROPOSAL ARE AS FOLLOWS:-

No highway objection in principle to the proposals submitted on drawing number 1618:PAC 04 and the supporting documents submitted as part of this application consultation process. 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 car parking allocation as detailed within this pre application consultation is in compliance with NPTCBC SPG Parking Standards (2016). The units are single storey and allocated with three parking spaces.

The access to the site is compliant with a width of 6.1 meters. The access is designed with a 6 meter radius which is substandard, but the vehicle tracking supplied with the application shows that the appropriate vehicles can enter and exit the development.

Bin storage facilities are compliant with accessibility of waste collection vehicles. The vehicle tracking supplied shows that a refuse vehicle can manoeuvre the site.

The development is compliant in maximising walking and cycling accessibility by including two cycling storage facilities. A pedestrian route to an active travel link has also been included in the development.

Vision splays of 2.4m by 90m onto existing public highways must be achieved. Pedestrian vision splays of 2.4 metres by 2.4 metres (measured back from back of footway) shall be maintained each side of each vehicular access within which nothing over 600mm in height shall be erected or allowed to grow and shall be retained as such thereafter.

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 SP2022.0010.

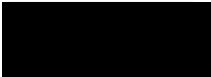
Please note that SAB approval will be required prior to any work commencing. It is a breach of approval required under Paragraph 7 (1) Schedule 3 of the Flood and Water Management Act 2010 whereby action will be taken by the Authority under The Sustainable Drainage (Enforcement) (Wales) Order 2018. You 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 or 01639 686850.

NOTES TO APPLICANT

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.

BT

SIGNED:  DATE: 26/10/2022
pp HEAD OF ENGINEERING & TRANSPORT

PAC REF: N322001100 - LAND TO THE NORTH OF OLD FOUNDRY ROAD

Mr Damian Barry
RPS
2 Callaghan Square,
Cardiff
CF10 5AZ

Date: 28/10/2022
Our Ref: PPA0007234

Dear Mr Barry

Grid Ref: 272489 204090

Site Address: Land North of Old Foundry Road Pontardawe, Neath

Development: 2D - The development of light industrial/commercial units (Use Class B2/B8) with associated parking, servicing, hard and soft landscaping and drainage infrastructure.

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

SEWERAGE

I 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 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

The foul flows only from the proposed development can be accommodated within the public sewerage system.

You are 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 you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that 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

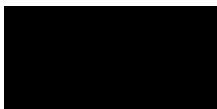
A water supply can be made available to service this proposed development. Initial indications are that a connection can be made from the 6" diameter CI watermain in 272562, 204117 location. The cost of providing new on-site watermain can be calculated upon the receipt of detailed site layout plans which should be sent to the above address.

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

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

Please quote our reference number in all communications and correspondence.

Yours faithfully,



Owain George
Planning Liaison Manager
Developer Services

Enc. Water plan

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.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dwr 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.



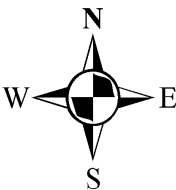
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Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

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



LEGEND

Clean network:

- | | | | |
|--|-------------------------|--|-----------------------|
| | Sluice valve | | Stop tap |
| | Pressure reducing valve | | Water Treatment Works |
| | Meter | | Water Pumping Station |
| | Bulk meter | | Existing main |
| | Hydrant | | Non-operational main |
| | Cap end | | Raw Water |
| | Air valve | | |

NB: Water main symbol colour indicates the type.

LIGHT BLUE - Trunk
DARK BLUE - Distribution
YELLOW - Raw Water

Notes:

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation

Dŵr Cymru Cyfyngedig ("the Company") gives this information as to the position of its underground apparatus by way of general guidance only and on the strict understanding that it is based on the best information available and no warranty as to its correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. The onus of locating apparatus before carrying out any excavations rests entirely on you. The information which is supplied by the Company is done so in accordance with statutory requirements of sections 198 and 199 of the Water Industry Act 1991 which is based upon the best information available and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the existence of a water main, service pipe, sewer, lateral drain or disposal main and any associated apparatus laid before 1 September 1989, or, if they do, the particulars thereof including their position underground may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provision of the New Roads and Street Works Act 1991 and the Company's right to be compensated for any damage to its apparatus.

Service pipes are not generally shown but their presence should be anticipated.

**EXACT LOCATIONS OF ALL APPARATUS
TO BE DETERMINED ON SITE.**

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Map Ref: 272527,204109
Map scale: 1:1250
Printed by: Gillian Williams
Printed on: 28 Oct 2022

Damian Barry
RPS

Your Ref

Our Ref CRTR-PLAN-2022-37265

Tuesday 25 October 2022

Dear Damian Barry

Proposal: The development of light industrial/commercial units (Use Class B2/B8) with associated parking, servicing, hard and soft landscaping and drainage infrastructure

Location: Land to the North of Old Foundry Road, Pontardawe

Waterway: Swansea Canal

Thank you for your consultation.

We are the charity who look after and bring to life 109 miles of canals in Wales. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of Wales. The Trust is known as Glandŵr Cymru, the Canal & River Trust in Wales and we are a statutory consultee in the Development Management process.

We have reviewed the pre-application consultation and based on the information available the Trust has **concerns** relating to the following issues, and we ask that further discussions take place prior to the submission of a formal planning application.

Previously Glandŵr Cymru objected to the proposal for housing on this site, (P2019/5708 in our response dated 11.03.2020) as the applicant had failed to provide sufficient evidence to allow the impact of the development on flood consequences, land stability and the restoration of the Swansea canal to be appropriately assessed. Previously we objected to the proposal as being contrary to TAN 15, Paragraph 6.9.23 of Planning Policy Wales 10 and Policies EN8 and BE3 of the adopted Neath Port Talbot Local Plan.

It is noted that the same supporting documents are provided as part of this pre-consultation. Our comments relating to the lack of adequate supporting evidence therefore largely remains unchanged. The current proposal is for light/industrial/ commercial units and the use of the site in this way does give less cause for concern, however we suggest a meeting with the applicant prior to the submission of a formal planning application is required.

The site is located on land below the Swansea Canal which runs on an embankment for the length of the site. Since the Gilvern breach on the Monmouthshire 8 Brecon in 2007 the Trust have invested a lot of time and effort understanding and managing the risks associated with our canals and we have carried out work to model flood inundation below high consequence embankments.

[Glandŵr Cymru](#)

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

[T 0303 040 4040](tel:03030404040) [E canalrivertrust.org.uk/contact-us](mailto:canalrivertrust.org.uk/contact-us) [W canalrivertrust.org.uk](http://canalrivertrust.org.uk)

For information, the Swansea Canal embankment suffered a breach in 1998 very close to this site, with flood water causing nearby land, businesses and houses to flood. The embankment is owned by the applicant and supports both the canal and towpath.

Technical Advice Note 15: Development and Flood Risk (TAN 15) identifies flood risk from canals in section 11.2411.25 and identifies the need to consider their capacity to cause local flooding where overflow channels fail to operate, or an embankment fails or is breached.

The applicants discussed the consequences of a breach of the canal above the site with the Trust during the course of the previous application and as a result a flood consequence assessment was provided which takes some account of flooding from this type of event.

Previously the FCA was written on the premise that the canal towpath could be raised by up to 500mm to prevent overtopping. It is not clear if that is still the intention, but it is not mentioned on any of the submitted drawings, and it appears that there is no intention to alter the towpath or the canal embankment. This should be clarified. If the towpath is not to be raised this minimises the impact of the proposal on the embankment but does not overcome concerns relating to flooding in the event of a breach or overtopping event.

Glandŵr Cymru previously agreed that the modelling that was carried was in accordance with our guidance, but it should be noted that the modelling results are for a blue sky event'. i.e., what could happen if the embankment itself failed with normal (non-flood) levels of water in the canal. The modelling including the raising of the towpath.

If the towpath is not now to be raised, the canal overtops or if there was a failure of water control infrastructure, then low peak flows and the duration of flows to the site could be significantly different to that indicated in the flood modelling. This was the case in the 1998 breach adjacent to this site, and as a result the flood water levels, extent and damage was greater than the submitted modelling indicates. The applicants should clarify their intentions and re-run the modelling if the parameters have altered prior to the submission of the formal application.

Site earthworks can be used to divert flows away as raising the towpath only moves the problem. Potential management of inflows may provide the best mitigation. In order to fully understand the impact of the proposal, further information will be required, such as additional cross sections, detailed drainage plan and construction methodology for works at the toe of the embankment

Historically, there are occurrences where canal embankments suffer from leakage. The applicants should carry out a full investigation of the site prior to determination and this may indicate a need to undertake permanent repairs to the canal or embankment to minimise the risk of leakage in the future. Dependent on the findings of this investigation, the Trust may wish to seek a contribution towards the cost of permanent mitigation or additional inspections of our asset in line with the advice given in TAN 15.

Current planning guidance requires planning authorities to take into account the nature, scale and extent of ground instability. It recognises that slopes and embankments can be put at risk from inappropriate neighbouring development, and where relevant, land stability should be addressed, and appropriate mitigation measures secured to protect both existing assets and proposed development itself.

The plans suggest the developer will excavate foundations into the lower levels of the embankment. Any construction works or alterations to the ground profile could potentially destabilise the embankment and increase the likelihood of failure, resulting in the collapse of the towpath and possible breach of the canal.

The submitted cross sections appear to indicate that the impact of the proposed industrial units is less than that previously shown for the houses, however additional cross sections throughout the site would be of assistance, as well as further details regarding the piled foundations.

The CEMP largely deals with the impact of the proposal on neighbouring properties. A more detailed section on protection of the canal embankment during works, would be of assistance.

It appears from the site Investigation report the trial pits and bore holes carried out recently and in 2006 have not investigated the canal embankment. The site investigation report recommends that 'a stability assessment or

Glandŵr Cymru

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 **E** canalrivertrust.org.uk/contact-us **W** canalrivertrust.org.uk

similar is completed on the north of the site prior to redevelopment. The report states that, when engineering levels are understood, an assessment of the temporary works and permanent works required to ensure the short, medium and long-term stability of the bank and canal is maintained should be completed. This report requires updating.

In order to understand the impact of the ground re-modelling and the temporary and permanent works, a geotechnical survey of the embankment, a slope stability analysis and details of foundation design within the zone of influence of the embankment will all be required prior to the submission of a formal planning application as both the stability of the embankment and further work to assess flood flows could have an impact on the site layout and viability.

The length of canal adjacent to the site is safeguarded under Policy BE3 1.b of the adopted local plan which states;

Proposals which would prejudice the conservation, restoration and operation of these safeguarded lengths of canal will be resisted. Proposals will need to demonstrate that they would not adversely affect the setting of the canal or prevent or discourage the use of the canal for recreation and water supply.

As mentioned above, it is not clear if it the applicant's intention to raise the towpath by 500mm or whether the various reports need to be updated to remove reference to this. Doing so will have an impact on the freeboard of the canal (the distance between the water level and the towpath level) which could prevent this area of canal being used recreationally in the future. The height difference would be too great to allow safe access for canoeists etc. Increasing the use of the canal for non—motorised watersports is an aspiration of both the Swansea Canal Society and Glandŵr Cymru as the next stage in the restoration of the canal.

Any failure in the embankment as a result of this proposal could result in the loss of water in the canal, leading not only to the flooding of the site and surroundings but an impact on businesses within the area who rely on a supply of water from the canal. Without further information on the physical impact of this proposal on the canal towpath and embankment it must be assumed that the proposal does not comply with Policy BE3.

Drainage

It is noted that surface water from block B will be collected and taken to the front of site. This should be discussed further with Glandŵr Cymru however it is expected that this will help minimise de-stabilisation of the embankment as a result of ground saturation and so this should be fully considered as part of the slope stability analysis. The details of the drainage area/channel at the rear does however require further clarification.

Future Management, Maintenance & inspection

Previously the Trust was concerned that the proposed retaining would not be owned or maintained by the Trust but will remain responsible for holding up our asset, the canal and towpath. If the change to industrial/commercial use means that the embankment will remain under the care of a single management company that would be beneficial, but this needs clarification.

The embankment is currently assessed on a bi-monthly basis, as regardless of the fact that it is not owned by Glandŵr Cymru we wish to ensure that it is not likely to cause a breach in our canal. Following further investigations to be carried out by the applicant and agreement as to the scope of any additional mitigation as a result of this and of the change of use of the land the frequency of inspections may need to increase.

It is suggested that a suitable access agreement is put in place. As mentioned above a contribution may be sought if additional inspections of their embankment are considered necessary as a result of this proposal.

Any new planting or the removal of existing planting and boundary treatments may affect our ability to inspect the high-risk structure as well as destabilise the embankment. It is noted that the arboricultural report also appears to relate to the previous proposal and may need updating.

Glandŵr Cymru

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It is suggested that a full landscaping plan is required as part of the formal planning application, not only to understand the impact on the embankment and ability to assess it, but also to properly understand the impact of the proposal when viewed from the canal.

Accessibility

It is noted that the canal towpath is not recognised as a sustainable active travel route, nor is an access suggested to it. The Council in conjunction with Glandŵr Cymru promote the towpath as a sustainable of-road transport route and work is currently being undertaken elsewhere on the towpath to improve it as a sustainable Active Transport route. The Active Travel (Wales) Act 2013, TAN: 18 (Transport) and Welsh Office Circular 13/97 (Planning Obligations) all suggest that planning authorities may use planning obligations to secure improvements to an active travel route.

Conclusion

Whilst the proposed use may give Glandwr Cymru less cause for concern than the original residential proposal, the pre-application as submitted does not provide enough detail to properly assess the proposal in terms of its impact on our asset, the Swansea Canal. Much of the supporting information is possibly now out of date and related to the previous residential proposal, and as such may require refreshing.

We request that a meeting take place to determine the level of additional detail required to allow a proper consideration of the proposal prior to the submission of a formal application.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

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