



PLANNING STATEMENT

**INSTALLATION OF ROOF-TOP EXTRACTION FLUES TO
FACILITATE THE USE OF INTERNAL BOILER APPARATUS
AT FORMER TRW PLANT, NEATH VALE BUSINESS PARK,
RESOLVEN, NEATH**

on behalf of
Biosol Renewables UK Limited

Our Ref: 1456.a
Date: April 2023
Prepared by: Richard Banks

1.0 INTRODUCTION

- 1.1 Evans Banks Planning has been instructed by Biosol Renewables UK Limited to prepare an application for full planning permission for the “*installation of roof-top extraction flues to facilitate the use of internal boiler apparatus*” At Former TRW Plant, Neath Vale Business Park, Resolven, Neath.
- 1.2 This Planning Statement therefore forms part of the submission of the application to be considered by the Local Planning Authority, and provides information on the following points:
- A brief description of the site and surrounding area
 - A description of the existing and proposed development
 - Consideration of relevant Planning Law
 - Assessment of the visual effects upon the setting of the immediate locality as a consequence of the proposed ancillary installation.

2.0 SITE DESCRIPTION

- 2.1 The application site consists of part of the extensive factory and industrial unit, formerly known as the TRW Plant at the Neath Vale Business Park at Resolven. The plant extends to some 15,500 square metres (167,000 square feet) of general industrial spaces, mostly concentrated in one large unit, which is set with a rear perimeter close and parallel to the Neath Vale railway line. The plant dominates the Neath Vale Business Park and is encircled by a range of various industrial units, office blocks and commercial buildings. All are concentrated off a level industrial estate with direct roundabout access off the A465 Llandarcy to Hirwaun Trunk Road. The location of the former TRW Plant is shown at Figure 1 below.

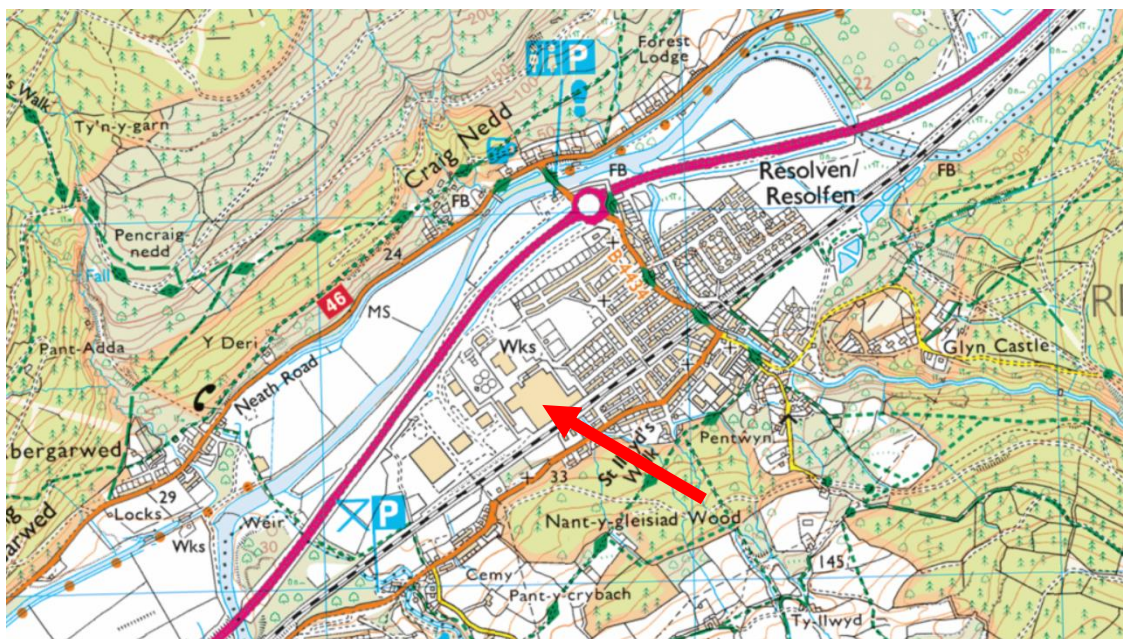


Figure 1 – location of former TRW Plant at Resolven

- 2.2 The property is set as one large industrial amalgamation of portal framed sheds with pitched roofs following a north-west to south-east roof line, with the building averaging roof ridge heights of circa 15 metres. The site is equipped with a large, surfaced car park to its eastern flank where a set of two-storey offices are to be found, whilst off the opposite western flank lie service doors for commercial loading / unloading via a surfaced operational yard. Figure 2 below provides an Ordnance Survey extract of the site, whilst Figure 3 provides the most recent Google Earth imagery.

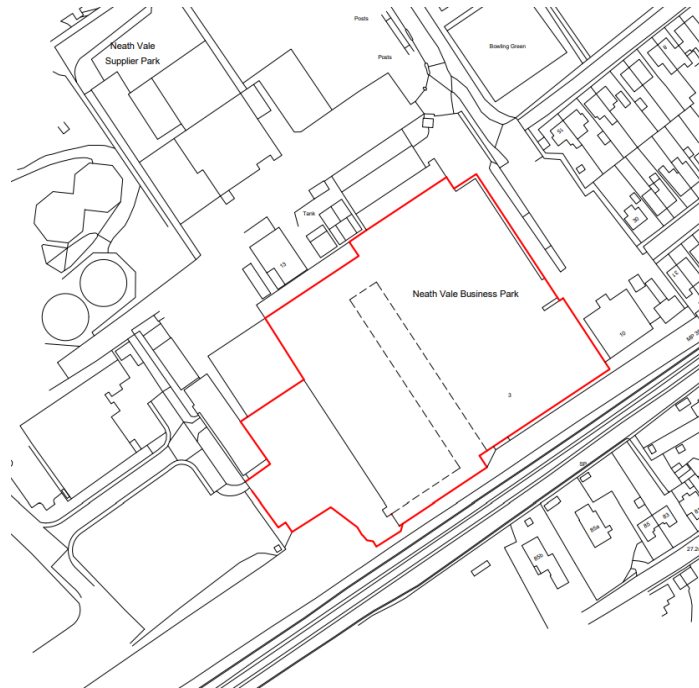


Figure 2 – Ordnance Survey map extract of application site

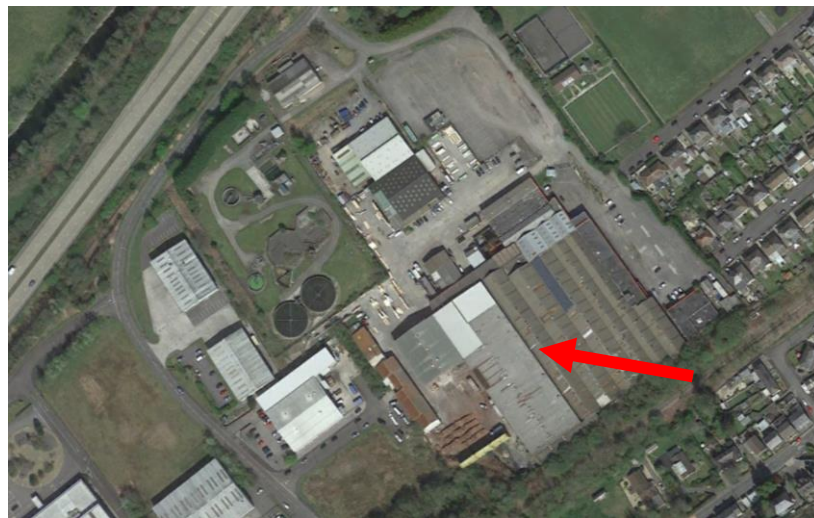


Figure 3 – Google Earth image of site at Neath Vale Business Park (April 2021)

- 2.2 The former TRW Plant has been split into a variety of commercially let units, all functioning as general industrial uses, taking advantage of the large elements of floorspace and the different additional units set close to the main factory plant unit.

- 2.3 The Business Park also extends westwards with detached and unrelated businesses set within their own expansive commercial curtilages, but also gaining vehicular access off the main spine estate road off the A465 roundabout at Resolven.
- 2.4 Temporary planning permission has also been granted in past years to use part of the factory unit as an Indoor Market. The last permission, referenced P2014/0361, was granted on 20th January 2016, with Condition No. 1 indicating that the use should only take place for a five-year period. We understand that the use of the majority of internal floorspace remains for use as an Indoor Market, and for up to two days per week. **However, part of that internal floorspace has returned to general industrial use (Use Class B2), as would have been required under the provisions of that temporary planning permission. The reverted use being that associated with the Applicant's business of processing waste wood for on-site energy use and to form wood products for onward sale elsewhere.** The Applicants have installed internal boiler equipment within this part of their leased floorspace for use as part of that general industrial operation.

3.0 PROPOSED DEVELOPMENT

- 3.1 Biosol Renewables occupy an extensive part of the main former TRW Plant unit – known as Unit 1. The business' operations within the site currently involve importing wood which is segregated through a chipping exercise. Wood chip is transferred into the factory interior where it is placed on drying beds which are heated to remove any water absorption. That dried produce is accordingly packaged for onward sale.

The excess wood from the initial segregation process is fed into boilers on site which generates heat energy to power the above drying process.

- 3.2 The entire process is therefore wholly cyclical with **no energy exported** from the site to the National Grid, or elsewhere. Figure 4 below provides a floor layout of the existing process taking place within Unit 1B at the site. Figure 5 illustrates where the current operation is based and where the proposals to install additional boiler systems will be located within an immediately adjoining internal part of the overall complex. Photographs 1, 2 and 3 below illustrate the internal operation of a large, open industrial space with woodchip loaded onto dryer beds, and the adjacent boilers generating heat to feed that drying process.

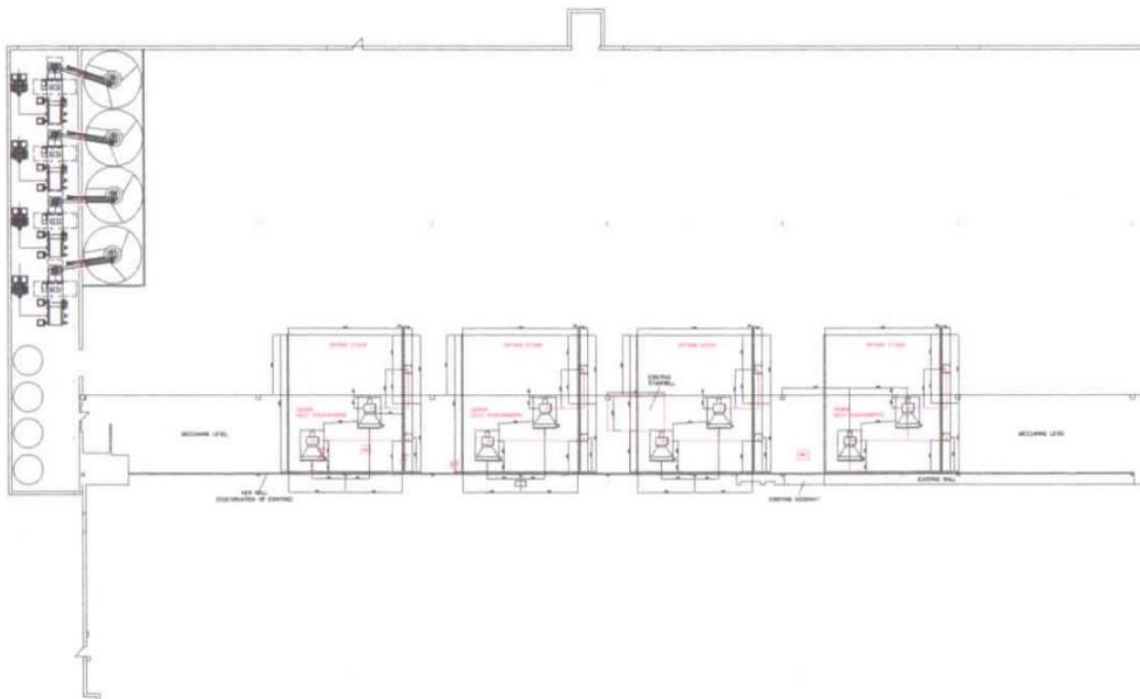


Figure 4 – existing floor layout plan of wood drying beds with internal boiler systems located nearby

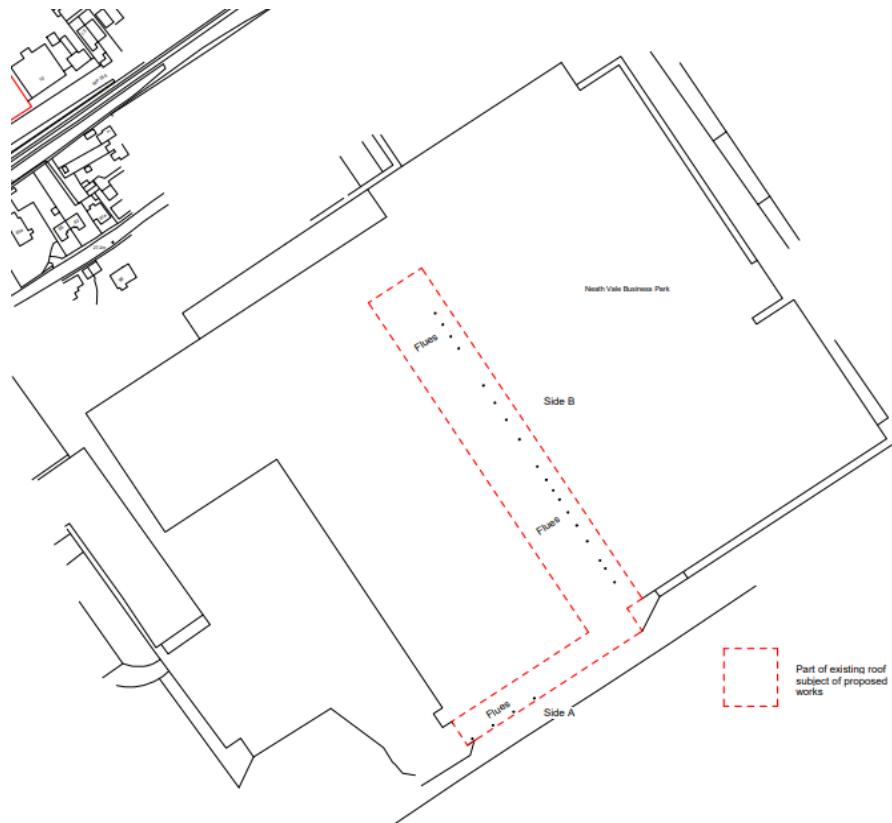


Figure 5 – existing Plant layout plan indicating location of existing and proposed units to expand internal boiler installation



Photo 1 – existing internal storage of woodchip with drying beds on show



Photo 2 – drying beds in operation with associated vehicles importing and exporting wood product



Photo 3 – dried wood chip stockpiled ready for packaging and export



Photo 4 – internal floorspace dedicated to boiler apparatus which generates heat for the drying process

- 3.3 The Applicants wish to replicate the existing process but use an adjoining internal floorspace to install additional boiler systems, as shown in Figure 6 below. The **additional boilers will generate heat to be used within the remainder of the Plant complex, including the office suites off the eastern flank of the plant.**

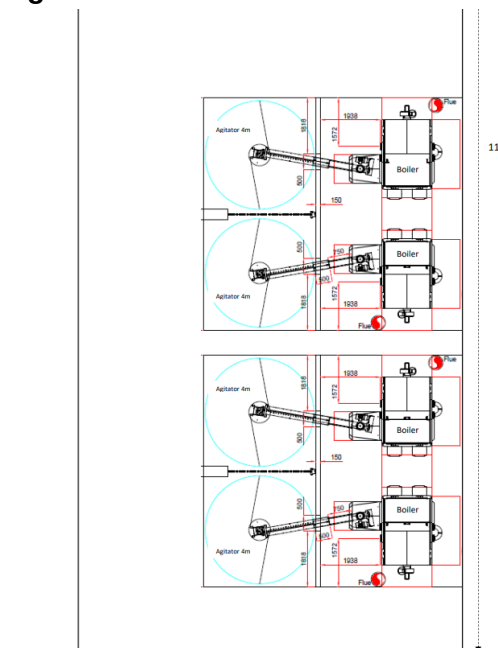


Figure 6 – proposed installation of additional boiler plant in adjoining part of building

- 3.4 The proposals will be wholly proposed within the centre of the former TRW Plant with no external floorspace created, nor any increase if the roof height of the existing structure. Instead, the proposals will require the installation of roof top extraction flue which are proposed to **protrude 1.5 metres** above the existing roof plane, as shown in the sectional plan reproduced below as Figure 7. It should be noted that the external flues will be set within a single roof valley, with the protruding flue at a mid-point in that precise roof plane. **The consequence of that position is that the exposed flue, even at a height of 1.5m above the roof plane will not rise to a height equivalent to the roof ridge level at that part of the building.**

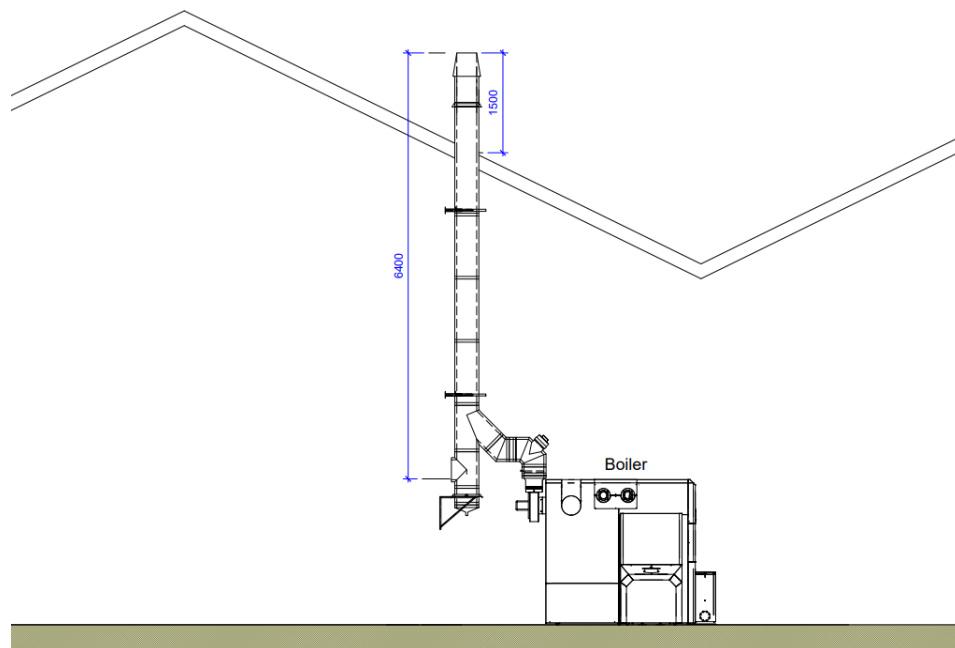


Figure 7 – proposed sectional plan illustrating extent of projection of external flue above existing roof plane

- 3.5 Four external flues are already in place across part of the southern elevation of the factory building. This application seeks to retain those flues in place and add a further 18 flues across one roof plane, as shown in Figure 8 below. That precise roof plane is set at a central position within the large factory unit, and it is notable that such flues, by not being located at the exposed fringes of the factory will be inconspicuous in the proposed position. Photo 5 below provides an illustration of existing flues, and their slender, unassuming appearance and form is readily confirmed.

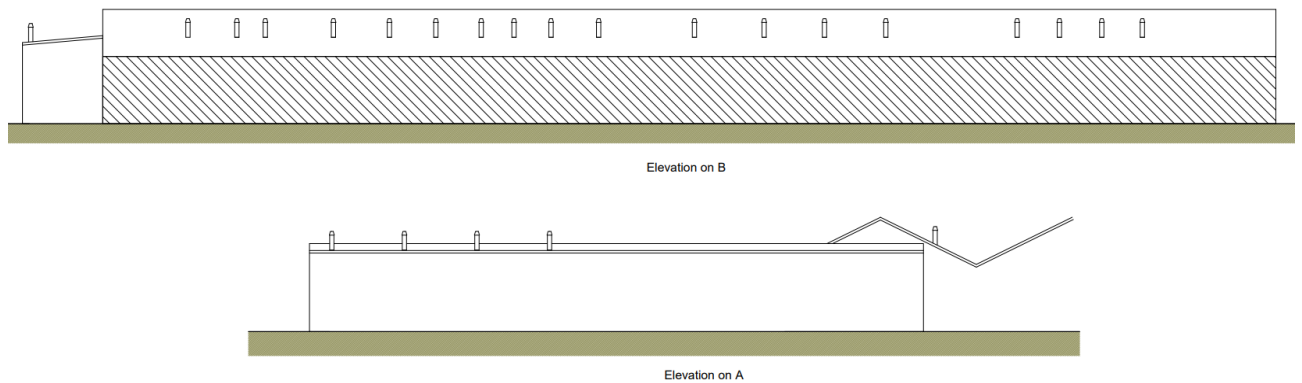


Figure 8 – proposed locations of external extraction flues upon selected roof plane



Photo 5 – existing roof-top external flues at Vale of Neath Business Park

4.0 LAWFUL USE

- 4.1 The property currently comprises of a variety of general industrial floorspaces under one building structure. The existing Use Class of those units therefore remains as Use Class B2, with the exception of the Indoor Market hall, which falls outside this Applicant's lease.
- 4.2 The "planning unit" is acknowledged by the established planning permission for the whole building, and thus the proposed internal alterations will not change that singular unit. The existing and proposed floor plans show that the proposed boilers will provide a subordinate and ancillary role in the function and operation of an industrial process, that being the processing of woodchip to form a finished wood product, and in the case of the proposed boilers to serve as an internal energy producing source to heat the entire complex. The proposals involve a reconfiguration of the internal layout of the industrial plant, but which will retain its predominant B2 use. Section 55 of the Town & Country Planning Act 1990 (as amended) defines what is termed "development" and stipulates that **interior works are exempt** from being categorised as development.
- 4.3 The occupants' means of internally accessing and egressing the building via the service doorway off the western elevation via the external operational yard will not materially change, nor would their means to park and externally operate a vehicle in the immediate locality. In short, we submit that the character of the "planning unit" would not materially change, and to the passer-by / member of the general public they would not be any discernible difference as to whether additional boilers are being introduced internally within part of the industrial building.

5.0 PLANNING POLICY

- 5.1 The development plan in force is the Neath-Port Talbot Local Development Plan (LDP). The following policies have been taken into consideration in the preparation of this planning application. The Proposals Map of the LDP identifies the Vale of Neath Business Park as an Employment Allocation, as shown in Figure 10 below, and specifically as Site EC2/16.

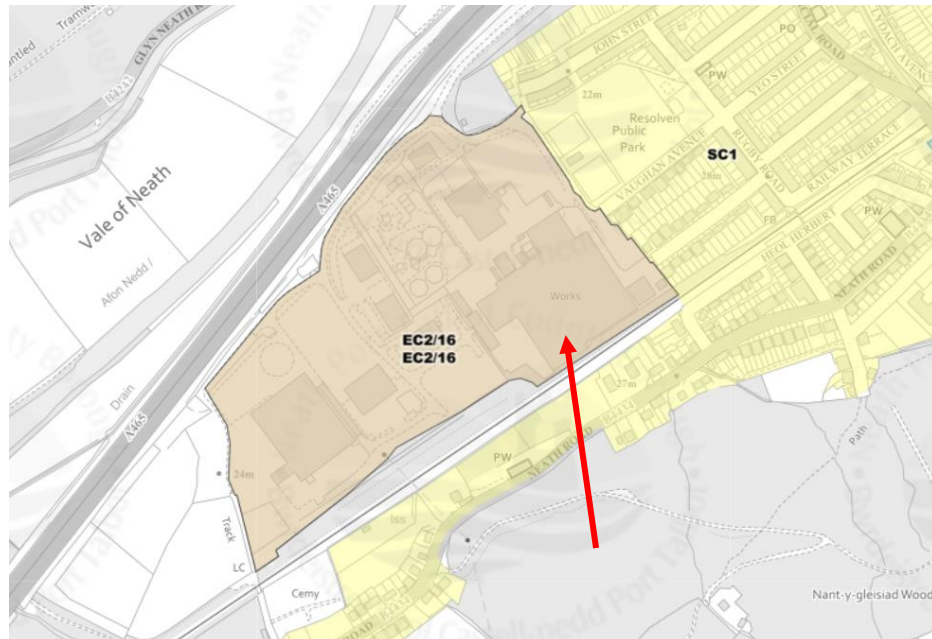


Figure 10 – Extract from NPT LDP Proposals Map for this part of Resolven with site highlighted

- 5.2 New development proposals are supported under Policy EC3, which states:
“Uses Within allocated and existing employment areas, unless otherwise specified and where appropriate, uses will be restricted as follows:
- *Uses within classes B1, B2 and B8;*
 - *Ancillary facilities or services which support and complement the wider role and function of the primary employment use;*
 - *Commercial services unrelated to class B.*
- Developments will be required to demonstrate that proposals do not cause any adverse impacts on the overall function of the employment area and neighbouring commercial and residential properties, the proposal can be sustainably justified in this location and is appropriate in scale and form to the role and function of the employment area.”*

- 5.3 Policy BE 1 “Design” requires that *“All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.”* Criterion 1. Requires all proposals to ensure they *“complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment.”*
- 5.4 The above photographic evidence and submitted plans graphically illustrate that the form of external works is minimal, being wholly ancillary and subordinate in the context of a very large industrial building, which rises to circa 9.5 metres in overall height. The installation of slender flues only 1.5 metres in height, and only positioned at a mid-roof plane location, **not above the roof ridge level of the building**, will result in those flues being inconsequential and minor in general appearance when viewing the site from public land.
- 5.5 LDP Policies EC3 and BE1 are accordingly satisfied, and it is respectfully requested that planning permission be accordingly granted for the installation of the external roof-top extraction flues.