

FULL PLANNING APPLICATION

BRITON FERRY WHARF, NEATH

THE CONSTRUCTION OF ADVANCED COMPOSITE MANUFACTURING FACILITY, ASSOCIATED PARKING, STORAGE AND LOADING FACILITIES AT THE DOCKSIDE

PLANNING, DESIGN AND ACCESS STATEMENT

MARCH 2023



Geraint John Planning

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of a planning application, submitted on behalf of Camplas Holdings Ltd, in relation to the following development proposal:

"The Construction of Advanced Composite Manufacturing Facility, Associated Parking, Storage and Loading Facilities at the Dockside".

Information Submitted in Support of the Application

- 1.2 This Planning, Design and Access Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development.
- 1.3 The Design and Access Statement has been combined with the Planning Statement to form one document, considering the context and nature of the development.
- 1.4 A Design and Access Statement should effectively:
- Communicate the vision and principles of the scheme;
 - Explain how the objectives of environmental sustainability and good design have been applied;
 - Demonstrate that design issues have been considered early in the design process;
 - Demonstrate a commitment to 'inclusive design' – so that the development is accessible to all regardless of age, gender and infirmity.
- 1.5 In line with the relevant guidance, this Planning, Design and Access statement aims to explain the design concepts and principles applied to the development in relating to:
- Access;
 - Character (including amount, layout, scale, appearance and landscaping);
 - Community Safety;
 - Environmental Sustainability; and
 - Movement to, from and within the development.

Purpose and Structure of this Statement

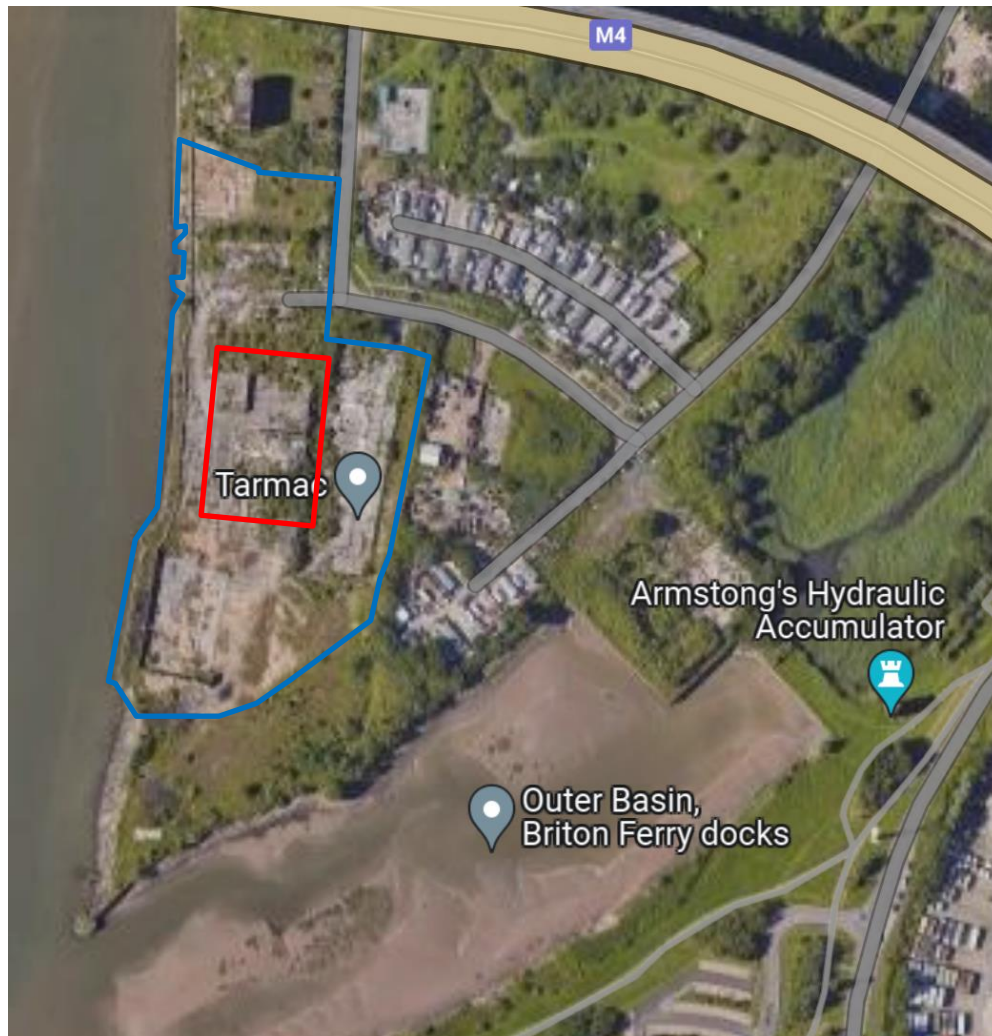
- 1.6 The statement is structured as follows:
- **Section 2** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site;
 - **Section 3** communicates the proposals and demonstrates the credentials of the proposed design;
 - **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
 - **Section 5** analyses the key planning considerations arising from the proposed development (in light of the planning policy context);
 - **Section 6** sets out our conclusions.
- 1.7 The following documents are submitted in support of the application, and should be read alongside this Planning, Design and Access Statement:
- Application Form;
 - PAC Report – Geraint John Planning;
 - Plans and Drawings – Gerald Blain Associates Ltd:
 - Dwg no. 01 Site Location Plan;

- Dwg no. 02 Existing Block Plan;
 - Dwg no. 03 Rev D Proposed Block Plan
 - Dwg no. 04 Rev C Plans & Elevations;
 - Dwg no.05 Rev C Site Section;
- Coal Mining Report – The Coal Authority;
- Noise Impact Assessment – ExCAL Limited;
- Contaminated Land Report – Landmark Information;
- Topographical Survey - JR Land Surveys;
- Preliminary Ecological Appraisal – Wyndrush Wild;
- Transport Statement – ExCAL Limited;
- Flood Consequences Assessment (including response to NRW Comments) - Shoreline Management Wales; and
- Heritage Impact Assessment (Prepared by Rob Scourfield – to be enclosed under separate cover).

2.0 SITE AND SURROUNDINGS

The Site

- 2.1 The site comprises of a parcel of broadly flat land located within Briton Ferry Industrial Estate. The site is approx. 3.68km south-west from Neath, and approx. 4.75km north-west from Port Talbot. The site is located within the administrative area of Neath Port Talbot Council and the proposed area measures to approximately 0.56ha.



Aerial view of the Site (Site Location Approximately Shown in red)



Aerial view of the site and surrounding context

- 2.2 The site comprises mainly of hardstanding and several walls enclosing various stocking areas across the site. The site was most recently used as a concrete batching plant but has now been vacant for several years.
- 2.3 The site is bounded to the west by the river Neath. To the south, the site is bounded by a salt marsh; and to the north-west of the site is a gypsy/traveller site and further north, the M4 motorway.



View of M4 and adjacent Gypsy / Traveller site

Site Surroundings

- 2.4 A scrap yard and traveller's site are located further to the east. The site is surrounded by several industrial / commercial uses including Tarmac Briton Ferry Concrete Plant, TOAST, Ecolab, and Green Technology Innovation Hub. The M4 motorway also is within close proximity to the site as shown in the photo below:



View of site and surroundings from M4 motorway

- 2.5 There are several heritage assets which are situated around the site. Most notably, Briton Ferry Ironworks Engine House, a Grade II listed building is North of the proposed site. Further details are included in Section 6.



Briton Ferry Ironworks

Access

- 2.6 The site benefits from an existing access point, abutting its north-eastern boundary, connecting to an unnamed access road.



Access to the site

Site History

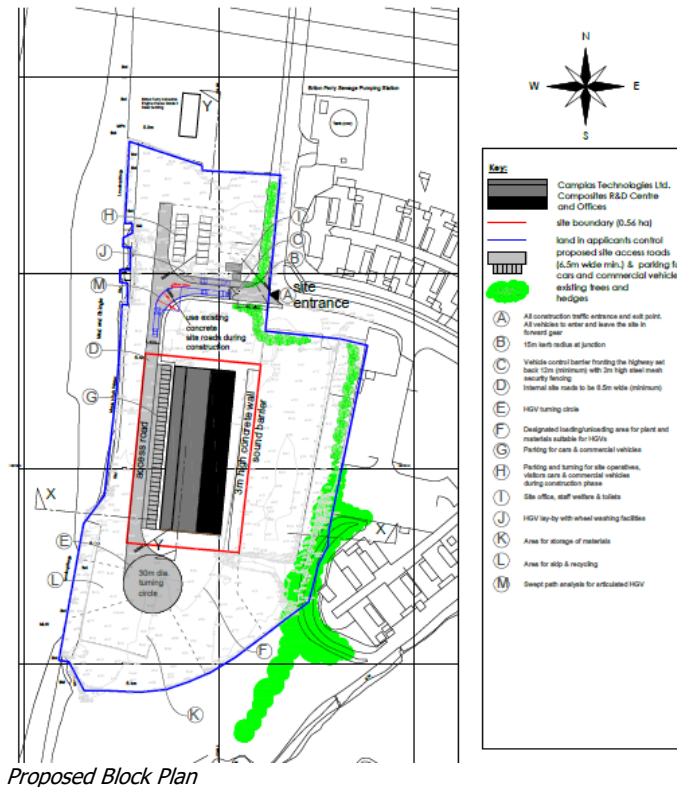
- 2.7 A planning application history search has been undertaken via Neath Port Talbot Council's on-line planning service. The site has been the subject of one planning application. This application, as well as several other applications of relevance, are summarised in greater detail below.

Application Ref.	Location	Proposal	Decision	Date of Decision
The Site				
P2014/0424	BRITON FERRY INDUSTRIAL ESTATE WHARF ROAD BRITON FERRY NEATH SA11 2HZ	Redevelopment of wharf area for 4300sq.m of Industrial (B1- light industrial, B2 - General Industrial and B8 - Storage and Distribution) floorspace (Outline application with means of access to be agreed)	Withdrawn	21/04/2015
Surroundings				
P2008/1354	LAND SOUTH OF WHARF ROAD CARAVAN SITE BRITON FERRY NEATH SA11 2LP	SITE FOR STATIC CARAVANS/MOBILE HOMES, FOR LONG TERM USE BY MAXIMUM OF 16 GYPSY FAMILIES	Refused	22/02/2009
P2004/0858	LAND TO NORTH OF M4 MOTORWAY AT FORMER ARC WHARF BRITON FERRY NEATH SA11 2LN	USE OF SITE FOR SAND WHARF, STORAGE OF AGGREGATES AND PRODUCTION OF READY MIX CONCRETE AND ERECTION OF BUILDING TO HOUSE PLANT AND PROVIDE STORAGE.	Approved	10/08/2004
P2001/1426	RIVERSIDE WHARF BRITON FERRY NEATH	ERECTION OF A 2.1 METRE HIGH PALLISADE FENCE AND GATES TO PART OF SITE BOUNDARY	Approved	15/02/2002
N1994/0079	RIVERSIDE WHARF BRITON FERRY NEATH	RETENTION OF SCRAP YARD OPERATION.	Approved	25/04/1994

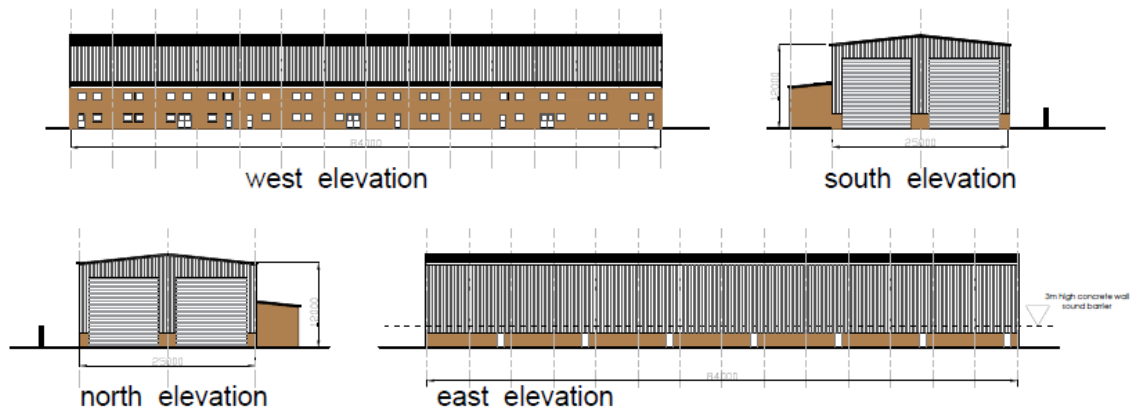
3.0 DEVELOPMENT PROPOSALS & DESIGN OBJECTIVES

Introduction

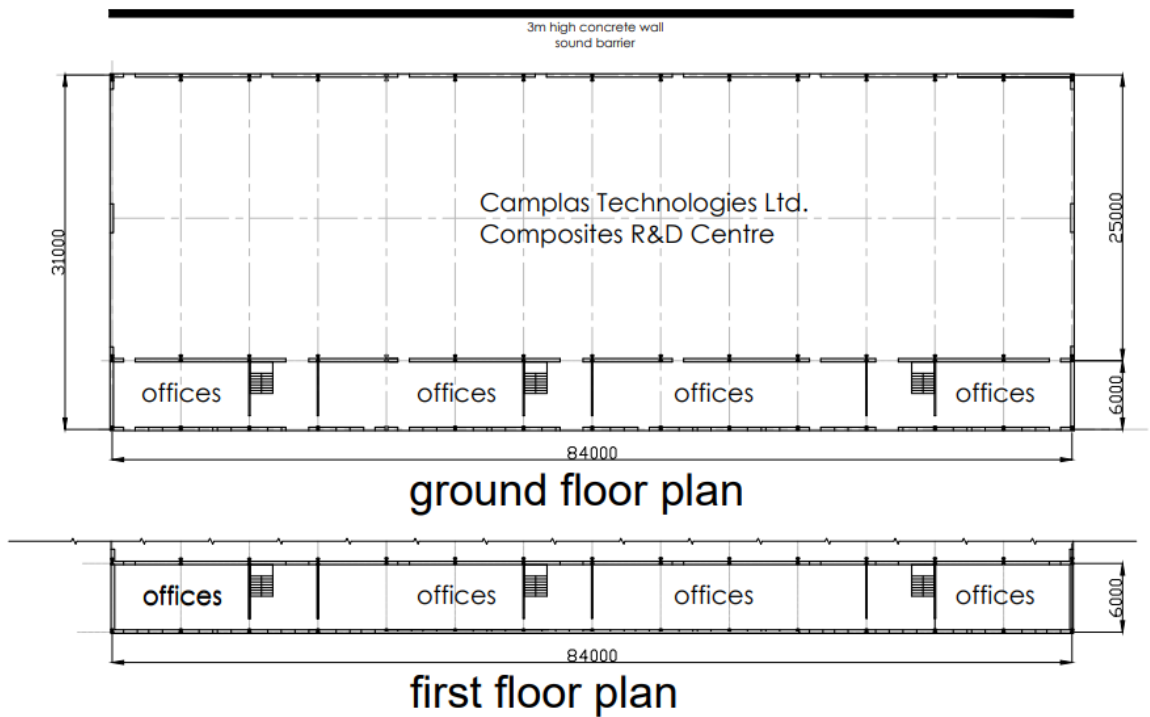
- 3.1 This chapter describes the elements which constitute the proposed development. It should be read in conjunction with the submitted application plans, drawings, and other information.
- 3.2 The proposal comprises the construction of a large industrial unit which will include two roller shutter doors to the east and west elevations and with two storeys of associated office rooms on the western elevation.



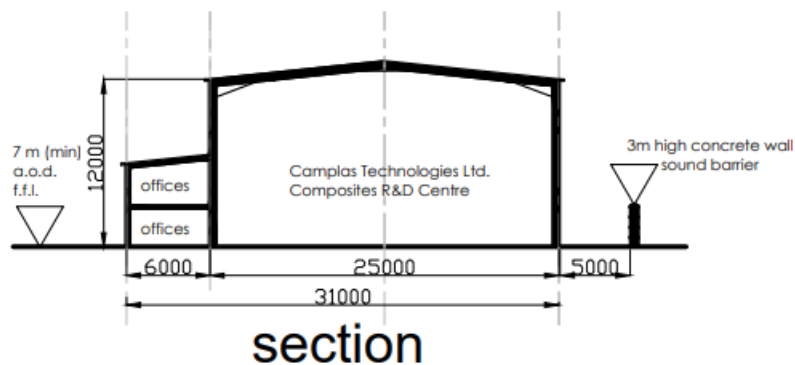
- 3.3 The site aims to export high volumes of GRP tanks via the river Neath, which are to be designed at the R&D Centre. Since the tanks are to be manufactured at the Briton Ferry site to then be loaded directly and transported by suitable vessels, the wharf location is important to the development.
- 3.4 The proposed R&D Centre is illustrated in the submitted drawings, extracts provided below:



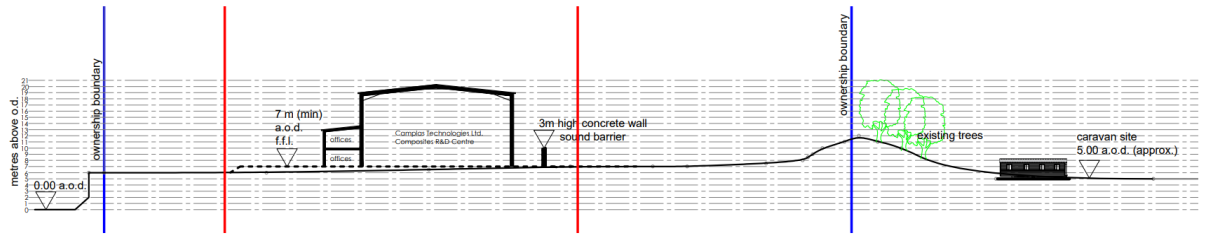
Proposed Elevations



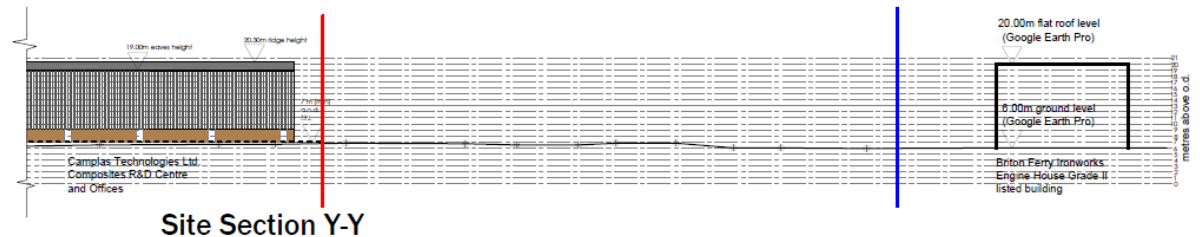
Proposed Ground and First Floor Plans



section



Proposed Section



Proposed Section in relation to existing heritage asset

- 3.5 Alongside the above, a 3m high concrete wall is proposed to act as a sound barrier and screens the development. The development benefits from further screening from the existing trees and hedges on the site.

Design Objectives

- 3.6 Design is defined within Planning Policy Wales (PPW) as:

"The relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings".

- 3.7 TAN 12 highlights that:

"Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone".

- 3.8 TAN 12 promotes key objectives of good design under the following headings:

- Character and Context;
- Community Safety;
- Environmental Sustainability; and
- Movement and Access.

- 3.9 The way in which each key objective has been considered and addressed in the design of the scheme is outlined below.

- 3.10 Moreover, the guidance set out in Design And Access Statements in Wales (April 2017) has also been considered in preparing this Statement.

Character and Context

Layout

Site

- 3.11 The site is located within Briton Ferry Industrial Estate on a site allocated for Safeguarded Freight Facility (TR4/3 – Marine Aggregate Wharf). The site includes hardstanding and numerous walls surrounding various stocking areas across the site.
- 3.12 The site is bounded to the west by the river Neath, to the south by a salt marsh and to the northwest by a caravan park. The site is served by an unadopted road. In the southeast corner, the site contains existing trees and hedges and vegetation which provides screening to the existing traveller park.
- 3.13 To make best use of the site the building is proposed to be in a logical position, away from the existing properties to cause the least amount of harm. This has also informed the positioning of the 35 car parking spaces. The desired location is also essential as the R&D Centre exports are proposed to be shipped via the river Neath, allowing for easy access leading to fast exportation.
- 3.14 The development proposes to use the existing concrete side roads and site entrance to access into the site. Staff and Visitor access will be by the same main access point with vehicles using the car park facilities to the south of the building and near to the offices. The development proposes to use the existing concrete side roads. All vehicular movements on site will be with a low-speed restriction.

Building

- 3.15 The proposal is for a R&D Centre building with an adjoining two storey office block which totals eight offices for the manufacturer of GPR storage tanks. The proposed unit size o/a is 84m x 31m x 12m to eaves.
- 3.16 Adjacent to the building is a 3m high concrete wall which is a sound barrier for the development ensures minimal noise disruption to the surrounding areas.

Scale, Amount and Appearance

- 3.17 The facility comprises 2,604sqm GEA Ground floor footprint.
- 3.18 The building is a combination of brick and steel-framed construction with a slightly pitched roof finished in a profiled metal cladding.
- 3.19 The architectural approach proposed echoes the surrounding typologies including the Industrial units a Chosen Park (Wernick Group Ltd and TOAST) to the southeast of the site proposals is in keeping with the industrial nature of buildings in the vicinity of the site.
- 3.20 The proposed height to eaves of 12m is determined by the size of equipment required for the manufacturer of GPR storage tanks. The void formed by the roof pitch provides for a fully accessible service zone housing mechanical and electrical plant and equipment serving the construction of turbine units.
- 3.21 Overall, the new unit for the manufacturer of GPR storage tanks at Briton Ferry will be a well-mannered development with a suitable design to fit the nearby industrial estates.
- 3.22 The external materials consist of fairfaces concrete blockwork and steel profiled cladding, with the colours to be confirmed.

Environmental Sustainability

- 3.23 Energy-efficient heating, cooling, ventilation and lighting systems will be used within the building. Energy-efficient light fittings will be used both internally and externally.
- 3.24 The proposed scheme seeks to achieve BREEAM – Very Good, with the relevant credits relating to the appropriate elements of the proposed development i.e. Transport and Noise, attained demonstrating to the sustainability of the proposal. Further details can be found within the accompanying reports.

Access and Movement

- 3.25 The site already benefits from the existing hardstanding and the existing site entrance which is to be used in the development. There are nearby bus stops and an increase in cycle provisions close to the site. The development will have access to allocated 35 parking spaces on site for staff and visitors. Footpaths will be extended into the site from the existing main road and linkages provided to all the main pedestrian areas.
- 3.26 In addition, as requested by the LHA within the Pre-Application Consultation (PAC) window, the proposal incorporates the following design features:
- A kerb radius of 15m is provided at the junction to accommodate HGV's, and the gates fronting the highway are set back 12m from the highway, and open into the site only;
 - The internal site roads are a minimum of 6.5m wide to allow 2 HGV vehicles to pass;
 - Swept path analysis has been undertaken to demonstrate that HGV's can pass at bends within the development;
 - A sufficient turning circle for HGV's is provided within the southern portion of the site; and
 - Designated loading/unloading areas for HGV's are provided.
- 3.27 The height of sectional doors will be set at an appropriate height to allow vans and lorries to reverse into each unit for loading and unloading, and to facilitate use of forklift trucks. Emergency exits are to be provided to each unit to facilitate egress.

Summary

- 3.28 It is considered that the manufacturing industrial unit has been designed to reflect the needs of the company whilst part of an industrial landscape. It has been carefully sited to respond to the context whilst allowing for future expansion.

4.0 PLANNING POLICY CONTEXT

Introduction

- 4.1 A review of the planning policy context associated with the site and proposed development (at the national and local level) is provided within this section of the Statement.

National Planning Policy

The following policy / guidance documents prepared at the national (Welsh Government) level are of relevance to the determination of this pre-application enquiry:

- Future Wales: The National Plan 2040 (February 2021);
- Planning Policy Wales (11th Edition, February 2021); and
- Technical Advice Notes (TAN).

- 4.2 Full detail of these National Planning Policies and planning Advice Notes has been appended to this pre-application submission (Appendix A).

- 4.3 The following policy / guidance documents prepared at the National (Welsh Government) level are of relevance to the determination of the application.

Local Planning Policy

- 4.4 The current development plan for Local Planning Authority comprises the Neath Port Talbot Borough Council Local Development Plan (2011-2026) which was formally adopted by the Council on 27th January 2016.



Extract of Neath Port Talbot Council Local Development Plan Proposals Map

The below policies are related to the site:

Neath Port Talbot Relevant Policies Key	
	Safeguarded Freight Facility: TR4/3 – Marine Aggregate Wharf

	Settlement Protection Zone
	Safeguarded Category 1 Sandstone Resource
	Application Site

4.5 To summarise, in terms of the site's designations the site is;

- Within a Coastal Corridor Strategy Area (Strategy Area Policy P5);
- Partially within a Settlement Protection Zone;
- Within an allocated Safeguarded Freight Facility (Policy TR4/3 – Marine Aggregate Wharf); and
- Within a mineral Safeguarded Area (Category 1 Sandstone Resource).

Relevant Policies

4.6 On the basis of the above, it is considered that the following policies are considered to be of direct relevance.

Policy	Title	Summary
Policy SP11	Employment Growth	Existing employment uses will be supported and safeguarded and new and expanding employment developments will be encouraged.
Policy SP17	Minerals	A proportionate contribution to meeting national, regional and local demand for a continuous supply of minerals will be made while balancing the impact of development on the environment and communities.
Policy SP20	Transport network	The transport system and infrastructure will be developed in a safe, efficient and sustainable manner through the following measures such as requiring appropriate parking provision and facilitating movement of freight by means other than road.
Policy SP21	Built environment Historic heritage Topic based Policies	The built environment and historic heritage will, where appropriate, be conserved and enhanced by encouraging high quality design standards in all development proposals.
Policy SC1	Settlement limits	Outside settlement limits, development will only be permitted under the following circumstances: 1. It constitutes a sustainable small scale employment use adjacent to a settlement limit; or 2. It constitutes live-work unit(s) immediately adjacent to a settlement limit in the Valleys Strategy Area only; or 3. It constitutes the small-scale expansion of an existing business or the suitable conversion of an existing building; or 4. It constitutes the appropriate replacement of an existing dwelling; or 5. It is an affordable housing exception site; or 6. It is an appropriate rural enterprise dwelling; or 7. It is an appropriate 'One Planet Development'; or 8. It is a sustainable tourism or farm diversification proposal that is suitable in a countryside location; or 9. It is associated with the provision of public utilities, infrastructure and waste management facilities that cannot reasonably be located elsewhere; or 10. It is associated with either agriculture, forestry, minerals or energy generation; or 11. It relates to the appropriate provision of accommodation for Gypsies / Travellers; or 12. It constitutes the provision of open space and small scale ancillary facilities adjoining the settlement limit. Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form.
Policy I1	Infrastructure requirements	In addition to infrastructure improvements necessary to make a development acceptable in health, safety and amenity terms, additional works or funding may be required to ensure that, where appropriate, the impact of new development is mitigated.
Policy OS1	Open Space Provision	In the case of employment or commercial development proposals of over 1,000 sqm, provision will be sought for associated amenity space.
Policy EN7	Important natural features	Development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds will only be permitted where full

		account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; or the biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.
Policy EN8	Pollution and Land stability	Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to the following will not be permitted: • Air pollution; • Noise pollution; • Light pollution; • Contamination; • Land instability; • Water (including groundwater) pollution. Proposals which would create new problems or exacerbate existing problems detailed above will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level.
Policy M1	Development in Mineral Safeguard Area	Development proposals within mineral safeguarding areas will only be permitted where it can be demonstrated that: the mineral concerned is no longer of any value or potential value; or the mineral can be extracted satisfactorily prior to the development taking place; or in the case of temporary development, it can be implemented and the site restored within the timescale that the mineral is likely to be needed; or there is an overriding need for the development; or the scale and location of the development would have no significant impact on the possible working of the resource
Policy TR4	Safeguarding Freight facilities	The following will be safeguarded for the transportation of freight: Port Talbot Tidal Harbour Port Talbot Docks, Existing & Potential Wharves and Existing Rail Connections & Sidings. Proposals that would inhibit the use of these for transport purposes will be resisted, unless it can be demonstrated that the use of the route for movement of freight is not realistic or necessary.
Policy BE1	Design	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.

Supplementary Planning Guidance

4.7 Neath Port Talbot Council has prepared and adopted Supplementary Planning Guidance (SPG) which provides additional policy advice to be read in line with the LDP. The following SPG's are considered to be of relevance to the site and proposed development:

- Parking Standards (October 2016);
- Biodiversity and Geodiversity (May 2018);
- Pollution (October 2016);
- Open Space & Greenspace (July 2017); and
- Design (July 2017).

Replacement Local Development Plan (RLDP) 2021-2036

4.8 Neath Port Talbot Council is preparing a replacement Local Development Plan. It is anticipated that this Plan will be adopted in 2025 and will run until 2036.

4.9 The Deposit Plan represents the first full draft of an emerging LDP which the LPA are currently preparing.

5.0 PRE-APPLICATION ADVICE

5.1 A Pre-Application Enquiry was submitted for the proposed development of the site, to Neath Port Talbot Council, in June 2020 for *"the constructing of a 3600m² advanced composite manufacturing facility, associated parking, storage and loading facilities at the dockside"*.

5.2 The key considerations outlined within the formal response pertaining to the development are reproduced below for context:

Principle of Development

5.3 With regards to Policy SC1 'Settlement Limits', the response outlines that the proposal's supporting documents should advice on how the development complies with this policy.

5.4 With regards to Policy TR4 'Safeguarding Freight Facilities', the site is allocated for freight transportation and since the products constructed at the site are proposed to be transported via the Wharf, this is considered compliant with TR4.

5.5 Since the site is within a mineral Safeguard Area (Sandstone resource) Policy M1, a development proposal should demonstrate the following:

1. The mineral concerned is no longer of any value or potential value; or
2. The mineral can be extracted satisfactorily prior to the development taking place; or
3. In the case of temporary development, it can be implemented and the site restored within the timescale that the mineral is likely to be needed; or
4. There is an overriding need for the development; or
5. The scale and location of the development would have no significant impact on the possible working of the resource.

5.6 To conclude the general principle of development from the pre-application response, the report stated that *the manufacturing of renewable energy components and the utilisation of the Wharf to transport these goods would be acceptable subject to complying with any other relevant policies set out within the Neath Port Talbot Local development plan, and there being no unacceptable impact in terms of residential amenity, visual amenity and highway and pedestrian safety, ecology, and historic heritage. The application submission would need to demonstrate its compliance with all the above policies.*

Visual Amenity

5.7 The response notes that limited information on the location of the building was provided so the following comments were general guidance.

5.8 The site is in a prominent location so the development would be visible to the surrounding areas. The response states *"It forms part of the basin entrance from the River Neath and is in clear view from the Quays, Council offices, and wales coastal path which runs along the riverside which are located across the tidal basin and the wider Baglan industrial estate. The elevated section of the M4 to the North provides a panoramic view over the site and the wider tidal basin and river area. In addition to this there is a listed building on site (the Old Engine house) and the structure at entrance to the tidal basin is also listed"*. This means that the design and materials should be carefully considered as well as the impact on the landscaped areas and outside storage areas to not negatively impact the visual amenity of the area, upon the listed building, and wider tidal basin and wharf area.

5.9 The report then states that the site is appropriate to accommodate a well-designed development which is well screened. Since the site is located between two gypsy traveller sites,

it could look out of place as it was stated that the building would be higher than the average industrial unit. Although, that was based on limited information so submitting further details may highlight that this is not the case, changing the LPA's minds.

Residential Amenity and Lighting

- 5.10 There is a gypsy traveller site nearby which is split into two sections: the larger section in the North and the smaller section to the south adjacent to the tidal basin edge. The report states that the development should not cause negative impacts in terms of residential amenity to the gypsies/travellers. Further to this, as the development may be operating 24hrs a day, external lighting for staff and security reasons could be needed so Any lighting design should ensure that lighting overspill from the development, does not negatively impact upon residential amenity.

Noise

- 5.11 The case officer stated that the development has the potential to produce a significant volume of noise due to the use of the dock and the potential sound absorbing capabilities of the building. Therefore, a Predicted Noise Assessment was suggested.

Biodiversity

- 5.12 The report states that Policy EN7 is of importance to ensure that any impacts on biodiversity and properly assessed and, where necessary, mitigated. The report says that *"the site is surrounded and close to several watercourse/estuary SINC's: this will need to be appropriately surveyed and assessed"*.

Highway and pedestrian safety

- 5.13 In terms of highways and pedestrian safety, the report states that *Vehicular access points should have a 4.5 by 43 metre visibility splay in either direction, and have a minimum width of 6.1 metres. Any gate erected across a vehicular access shall be set back a minimum of 20 metres. The Parking requirements for the development shall be in accordance with NPTCBC Parking Standards. (Highly Technical Industry).*
- 5.14 *The Highways section have also pointed out that the proposed development is served by an unadopted road, approximately 0.7km in length with no footway, cycle route and inadequate drainage. I have checked and believe that this road is in the ownership of Neath Port Talbot Council (Estates Section).*

Land Contamination and Flooding

- 5.15 The pre-app response states that a Phase 1 risk Assessment would be needed, as well as a site investigation and remediation may be necessary because of the site's previous land use. Also, as part of the site is located within the TAN15: C2 and B flood zone, a Flood Consequence Assessment produced in accordance with the guidance within TAN15 would and considering the proposal would be required.

Summary

- 5.16 The response concludes that the principle of the proposed development, having regard to the relevant policies of the LDP, can be supported provided the proposal is shown to be compatible with its location having regard to the detailed matters that have been raised herein.

6.0 MATERIAL CONSIDERATIONS

6.1 Having regard to the above, the key planning considerations arising from the proposed development are considered to be as follows:

- The Principle of the Proposed Development;
- Highways, Access and Parking;
- Flooding;
- Ecology;
- Residential Amenity;
- Land contamination
- Other considerations.

6.2 These issues are discussed in further detail below.

The Principle of the Proposed Development

National Planning Policy

6.3 As highlighted in Chapter 4 of this Statement and **Appendix A**, there are a range of national planning policies which the development will be assessed against.

6.4 PPW promotes the presumption in favour of sustainable development. The proposed development is considered to be sustainable for the following reasons:

- The surrounding area to the proposed development is located in close proximity to industrial premises and employment location. The proposed development would add to, and complement, the existing uses surrounding the site;
- The proposed development would provide quality, lasting, environmentally sound and flexible employment opportunities in this location; and
- The proposal seeks to enhance the economic activity in the area.

6.5 Given the proposal will bring about significant economic benefits to the locality and wider region, through the creation of employment opportunities, it is considered that the development will accord with the Welsh Government's aims to grow towns.

6.6 Moreover, the site meets the requirements of TAN 15 where the development is reliant on the location being next to the River Neath, albeit in a flood zone, for the transportation of goods made and designed at the proposed R&D Centre.

6.7 In light of the above, it is considered that the proposals are in compliance with the policies set out in Planning Policy Wales and Future Wales.

Local Planning Policy

6.8 As highlighted previously, there are a number of adopted LDP policies which the site must be assessed against in terms of the acceptability of the proposed development. These have been assessed in turn as follows:

- Policy TR 4 'Safeguarding Freight Facilities'

6.9 This policy encourages freight to be transported via ports, wharves, and railways. The proposal aims to ship the units via the existing Briton Ferry Wharf on the River Neath, complying with TR4/3. Paragraph 5.4.31 of the LDP states that the referenced safeguarding freight spots are necessary due to *the important role they have in supporting the local economy and allowing goods to be transported by means other than road, reducing congestion and emissions.*

6.10 It is considered that the proposals will comply with Policy TR4/4 as a result.

- Policy BE 1 'Design'

6.11 In accordance with Policy BE 1, the proposed development is made to a *high-quality design, taking into account the surroundings and built environmental context to create an attractive, sustainable place*. The proposed design is similar to nearby industrial warehouses, such as the Tarmac Briton Ferry Concrete Plant (approx. 0.2 miles North of the site) and units at Chosen Park Industrial Estate. The proposal includes landscaping provided by the existing trees and hedges in the south-eastern corner to, screening the site from the traveller site, complying with Policy BE 1.

- Policy SP20 'Transport network'

6.12 This policy promotes sustainable means of transport in NPT. The development complies with criterion 9 which encourages *facilitating movement of freight by means other than road*. This is because the GPR tanks which are to be built at the sites are to then be shipped via the river Neath, not by roads.

Employment

6.13 The proposed development will directly result in the creation of circa 30 new full-time jobs, creating further employment opportunities for the area, beneficially contributing to the economy. This is a key consideration of the proposals and is in line with the Economic Growth Strategy for South West Wales (2013 - 2030) 'Maximising job creation for all' through the following:

- *Supporting workforce re-entry amongst those who are economically inactive;*
- *Local enterprise development;*
- *Increasing job opportunities by supporting employment growth within the indigenous business stock;*
- *Establishing a co-ordinated programme of work experience placements and formal apprenticeships.*

Summary

6.14 The prevailing national and local policies seek to ensure that industry and employment generation is supported, the environment is protected, and sustainable transport and development is encouraged where possible. The proposed development embraces each of these fundamental principles.

6.15 The proposed development seeks the construction of advanced composite manufacturing facility for GPR storage tanks, associated parking, storage and loading facilities at the dockside. There are existing employment units in proximity to the site, and the proposed development would provide new employment opportunities in an established area. As noted, the site is located in proximity to existing employment uses and would be seen in this context, thereby integrating with its surroundings and reducing any effect in respect of visual impact.

6.16 The principle of the development therefore complies with the strategic aims of Policy SP20 (Transport Network), Policy SC1 (Settlement Limits), TR4 (Safeguarding Freight Facilities) and Policy BE 1 (Design).

Highways, Access and Parking

- 6.17 As per policy TR 2 of the LDP, the proposed development requires that development has appropriate and safe access and does not give rise to parking or highway concerns, for instance by promoting pedestrian, cycle and public transport access. Furthermore, necessary and appropriate transport infrastructure, including access and parking, are to be provided as part of the development. A Transport Statement has been prepared by ExCAL Transport Consultants.
- 6.18 Staff and visitor access will be provided by the same main access point with vehicles using the car park facilities to the west of the R&D and Office Centre building. All vehicular movements on site will be with a low-speed restriction. The on-site parking facilities will be in line with Policy TR2 – where the proposal shall comply with the parking and servicing standards set out in the Parking Standards SPG.
- 6.19 In terms of public transport, the Briton Ferry train station is located approximately 0.8 miles north-east from site (18-minute walk / 5 minute car drive) which allow for journeys to and from Cardiff and Carmarthen. The accompanying Transport Statement provides full details of the sustainability credentials of the site.
- 6.20 As part of the PAC exercise, it was confirmed by NPT Highways that they have "*no highway objection in principle to the proposal*" subject to minor scheme amendments, and submission of additional information. The following design 'tweaks' have been made to the proposals, comprising of:
- A kerb radius of 15m is provided at the junction to accommodate HGV's, and the gates fronting the highway are set back 12m from the highway, and open into the site only;
 - The internal site roads are a minimum of 6.5m wide to allow 2 HGV vehicles to pass;
 - Swept path analysis has been undertaken to demonstrate that HGV's can pass at bends within the development;
 - A sufficient turning circle for HGV's is provided within the southern portion of the site; and
 - Designated loading/unloading areas for HGV's are provided.
- 6.21 In light of these scheme amendments, the proposals are considered to be entirely acceptable from a highways perspective.

Flooding

- 6.22 Shoreline Management Wales, in support of the proposed development, undertook a Flood Consequences Assessment (TAN15) to assess how practical operational flood management at the site would utilise current, and probably improving over time, flood warning systems.
- 6.23 The FCA reports that currently the site is likely to be at risk from tidal flooding, where most of the site is within Flood Zone 3. However, much of the existing site comprises of concrete slabs and these are unlikely to increase flooding elsewhere because suitable mitigation measures can be implemented in respect of rainfall and run off.
- 6.24 Application P2014/0424, the proposed Business, Industrial and Storage space in 2014, although subsequently withdrawn, was also submitted with an FCA. This found that the proposal met the TAN 15 requirements through the justification test and acceptability criteria.
- 6.25 Further to this, the development is categorised in the TAN 15 guidance as being in the less vulnerable development category, where TAN 15 recognises the that under certain circumstances, such as industrial development, there is an allowance for flexibility to enable the risks of floods.

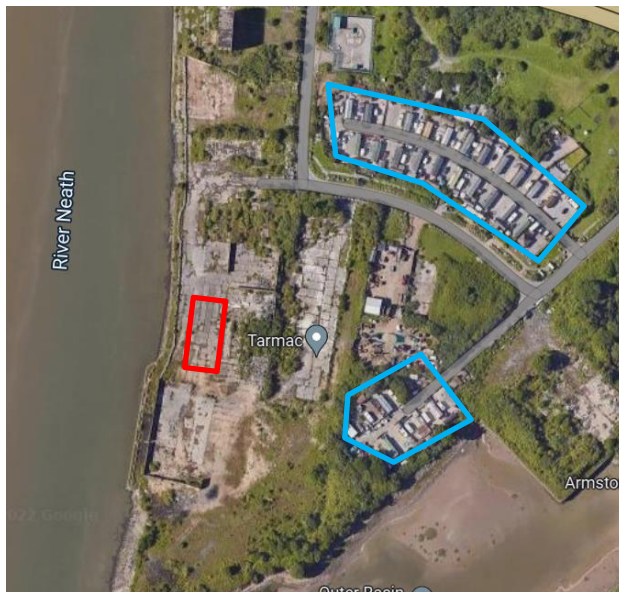
- 6.26 The report then goes on to examine how feasible operational flood management at the site would utilise current, and future, flood warning systems.
- 6.27 An additional assessment of the site's fluvial flood risk has been undertaken in light of NRW's statutory PAC response, which evidences that the proposal is not at fluvial flood risk, and the proposals therefore demonstrate their adherence with TAN 15.

Ecology

- 6.28 Wyndrush Wild, in support of this proposed development, have undertaken a preliminary ecological appraisal to provide a baseline to assess the value of habitats and their potential for protected species within and adjacent to the application site and to investigate potential impacts that may occur during construction and postconstruction stages.
- 6.29 The report found that although there are two protected SSI's within 1km of the proposal, neither would be impacted by the development. The survey found relatively diverse flora in certain areas of the site, but these areas have no potential for reptiles, and no notable invertebrate species were reported.
- 6.30 The report states that the *"Control or eradication of the two invasive non-native plant species is recommended. Any work such as movement of cut vegetation off site should take account of their presence. Any landscaping, including screening planting, should use native plants. A Pollution Prevention Plan may be required to ensure that construction and ongoing site use does not impact on the adjoining River Neath SINC and associated inter-tidal habitats. No other SINC's in the area would be impacted by the proposal."*
- 6.31 Furthermore, the report concluded saying that *"Landscaping associated with the scheme should seek to provide opportunities for species associated with open, disturbed ground, for example by limiting shrub planting to the eastern boundary, and instead working with natural revegetation of infertile substrates such as dredged sand or crushed rubble. Consideration of discharges from the site during and post-construction may require production of a Pollution Prevention Plan or similar."*

Residential Amenity

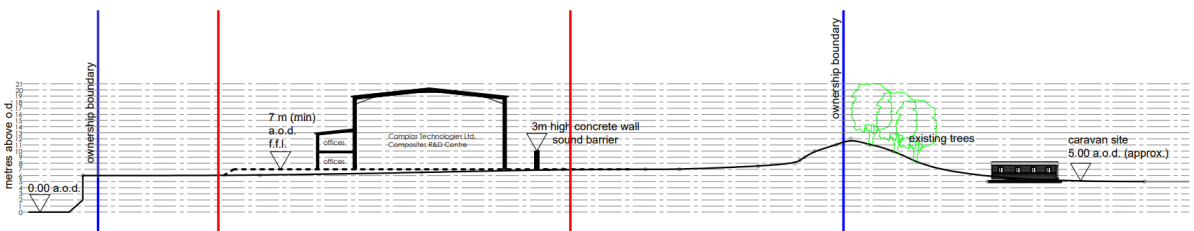
- 6.32 The site is located next to a gypsy/traveller site, split into two sections. The larger section is to the Northeast of the development whilst the smaller site is in the southeast, adjacent to the tidal basin edge. Residential amenity was highlighted as a consideration in the pre-application response. Therefore, any possibility of noise and visual impacts has been assessed as part of the proposals:



Residential amenity approx. in blue

Noise impacts

- 6.33 ExCAL were commissioned to undertake a comprehensive Noise Assessment of the proposed GRP Production Facility, to assess its impacts upon nearby sensitive receptors (residential properties), once the development is in operation. To mitigate against any noise pollution, ExCAL proposed to include a 3m high barrier along the eastern barrier, as per the below.



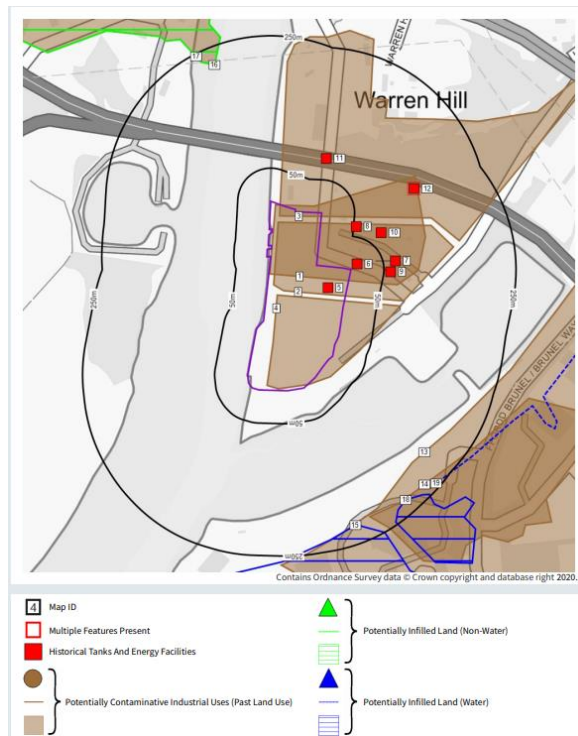
Extract of Proposed Site section

Visual impacts

- 6.34 The existing trees between the caravan site and the development will screen the development to soften the visual impact of the R&D centre and offices onto the surroundings and nearby caravans.
- 6.35 In addition to the above, and as confirmed in the accompanying reports, and discussed above, the proposed development will not have any detrimental impact upon nearby residents relating to matters comprising odour, parking, highway safety, or any other consideration. Therefore, the proposal is considered acceptable, in terms of impact upon amenity of residents.

Land Contamination

- 6.36 A Land Contamination Report (ref. 257067073) was undertaken by Landmark Information. The below map highlights the location of potentially contaminative historical land uses identified through mapping.



Historical Land Uses

- 6.37 On the site the report found one Local Authority Pollution Prevention and Control named Hanson Aggregates South Wales Limited which was dated 1st August 1992 and one Local Authority Pollution Prevention and Control Enforcements dated 10th June 2004. A Pollution Prevention Plan is proposed to be conditioned as part of any future permission.

Other Considerations

Historic Environment



Historic Wales Map

Key	
	National Monuments Record of Wales
	Historic Environment Records
	Listed Building
	Scheduled Monuments

- 6.38 As shown in Historic Wales map above, there are no heritage assets located within the site boundary of the proposed development.
- 6.39 However, there are identified assets located in close proximity to the site. The closest assets are identified as Historic Environmental Records (green) and National Monuments Record of Wales (red). Examples of heritage surrounding the site are listed below:
- The Grade II Listed building named the "Briton Ferry Ironworks Engine House", is located on the North West side of Briton Ferry docks and immediately South of the elevated M4;
 - The Grade II listed structure, named "North Jetty of outer Tidal basin" at Briton Ferry Docks in on the entrance to the tidal basin close to the site; and
 - A Scheduled Ancient Monument named "Briton Ferry Dock Entrance" is nearby to the application site.
- 6.40 Given the location of the proposed facility within the site boundary, and its proposed use, it is considered that there will be no material impact upon these assets in any event. The facility will be sited a fair distance away from the records and any other historical designations in the vicinity of the site.

- 6.41 A Heritage Impact Assessment (HIA) has been prepared by Rob Scourfield in support of the scheme, to demonstrate the scheme's acceptability in this respect. This has been enclosed under separate cover.

Archaeology

- 6.42 The applicant has confirmed that they are agreeable to the imposition of a planning condition, requiring the preparation and submission of an archaeological desk-based assessment for formal approval. It is therefore considered that the archaeological value of the site should in now way withhold the issuing of planning consent.

PRoW

- 6.43 A review of Neath Port Talbot's Public Right of Way (PRoW) map confirms that there are no PRoWs that run directly through or adjacent to the site boundary of the proposed development. As such, the proposal will not impede upon any footways in any event.



Neath Port Talbot's PRoW Map

Coal Risk

- 6.44 As part of the PAC exercise, The Coal Authority have confirmed 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.*"
- 6.45 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.*
- 6.46 In light of this information, Coal Risk is considered to have no constraints to the development.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 The proposed development seeks permission for the '*Construction of advanced composite manufacturing facility, associated parking, storage and loading facilities at the dockside*'.
- 7.2 It is considered that there are several material considerations in support of the application, which include the following:
- The site has been identified as falling within an area safeguarded for freight – Policy TR4/3. As the final products planned to be shipped via the River Neath, the principle of development is considered appropriate;
 - The proposed development will bring about significant economic benefits to the local and wider region, by way of creating further employment opportunities;
 - The proposed development will coincide with the surrounding industrial land uses;
 - The facility will assist to increase economic activity within the locality;
 - The proposal will not have any detrimental impact upon the amenity of adjacent occupiers including lighting, noise, odour and highway safety;
 - The proposal will not have any adverse impact upon existing trees and ecology within and adjacent to the site;
 - The proposals would have no harmful impact upon the neighbouring heritage assets, and any archaeological matters can be dealt with as part of the imposition of a pre-commencement planning condition on any future planning approval; and
 - The principle of the development complies with the strategic aims of the LDP, as well as PPW11 and Future Wales.
- 7.3 Having regard to the above material considerations, it is considered that the proposed development represents an appropriate and a wholly policy compliant scheme, which makes good use of this existing site.
- 7.4 Accordingly, it is therefore considered that the proposed development is acceptable, and we would respectfully request that the application be approved.