

NEATH SHRIMP FARM TRANSPORT STATEMENT NOVEMBER 2023

1.0 INTRODUCTION

1.1 Background

- 1.1.1 This Transport Statement (TS) has been produced to consider the highway implications of a proposal to convert a rear section of existing building to create a shrimp farm ('aquaculture') facility, including reconfiguration of roof to provide additional height clearance and ancillary alterations.
- 1.1.2 The existing building has had several occupiers over the last 10 years which are known to be Metal Box who manufactured metal containers up to 2012 and then up to 2016 Crown Foods (food manufacturing) with the building remaining empty until the present time. In this regard, it is considered that the current building use can be classed as B2 'Industrial'.
- 1.1.3 The existing GFA of the building for this application is approximately 7728m² and utilises the sites existing car parking provision around the building.
- 1.1.4 The existing site access arrangements will remain unchanged for this application.
- 1.1.5 There has now been recent pre-application advice given by Neath and Port Talbot Council to which this TS seeks to respond. Please see attached as **Appendix A**.
- 1.1.6 Architects' plans attached as **Appendix B**.

2.0 POLICY

- 2.1.1 Whilst preparing this TS Entran Ltd and has sought to reference both National and Local Policy and Plan Documents including:
 - TAN 18;
 - Active Travel Wales (2013);
 - Wellbeing of Future Generations (Wales) Act 2015;
 - Planning Policy Wales 10 (PPW10);
 - Neath and Port Talbot County Borough Council - Local Plan 2016-2026;
 - SPG – Parking Standards (October 2016); and
 - National Standards / WG / SWTRA documents.



3.0 EXISTING SITE CONDITIONS

3.1 Current Site Usage

- 3.1.1 The existing site use class is considered to be B2 'Industrial' and the building is under the application is currently vacant and not operational.

3.2 Site Location

- 3.2.1 The site is located on Milland Road Industrial Estate, Neath, SA11 1NJ.
- 3.2.2 Milland Road is accessed off the A474 which in turn forms a roundabout with the A465.
- 3.2.3 To the west the A465 provides access to the M4 at J43. From the A465 and M4 all major routes can be connected to.
- 3.2.4 **Figure 3.1** below shows the site location in bold plan and visual form.

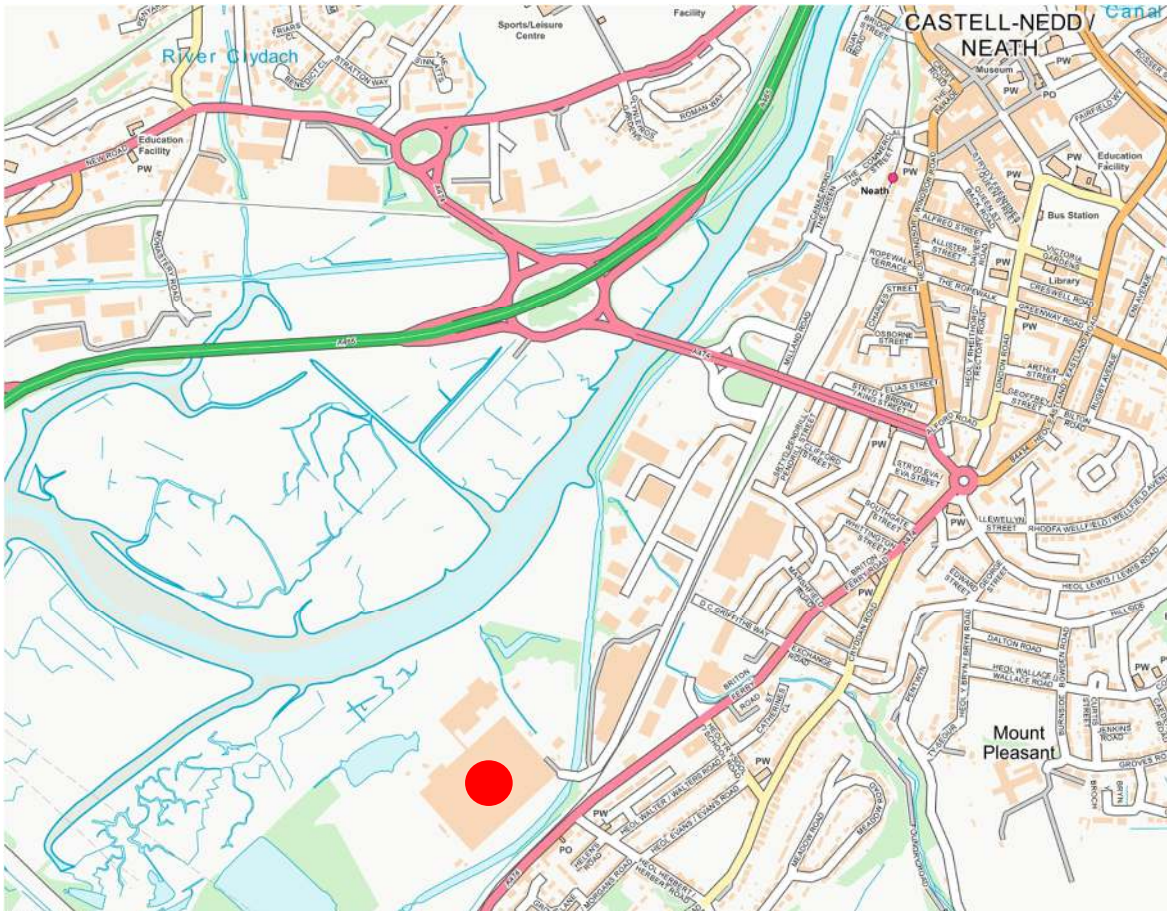




Figure 3.1 – Site Location Plans

3.3 General

- 3.3.1 Milland Road is approximately 7.3m wide, has a posted speed limit of 20mph, benefits from traffic calming measures, extensive no waiting restrictions and a comprehensive street lighting system.
- 3.3.2 Milland Road has a continuous footway along its southern flank and where required dropped kerbed crossings that include tactile paving.



- 3.3.3 There is also a footway crossing over the railway line adjacent to the site access which provides a route to public transport links (see Figure 3.1 above).
- 3.3.4 There are no dedicated cycle lanes however, Milland Road and other local roads are wide enough to cater for a cyclist and a vehicle ensuring that there are no barriers to pedestrians or cyclists in this location.
- 3.3.5 Utilising the footbridge there are local bus stops on the A474 within a 200m of the site serving routes 87 and X5 Cymru Clipper. Route 87 runs at a frequency of 20 mins at peak times ensuring that there is no barrier to the use of public transport from local residential areas and that anyone choosing to use the bus can do so conveniently. These stops include for laybys, shelters and raised kerbing (see Figure 3.1 above).
- 3.3.6 The nearest train station is Neath approximately 1.4km from the application site. A train from Cardiff takes approximately 35 minutes therefore, if anyone chooses to use the train to commute, they can do within a reasonable 1-hour commute time including a 15 minute walk from the Train Station to the application site.

4.0 PROPOSED SITE

4.1 Overview

- 4.1.1 The rear conversion of the existing building is proposed to be re-designated as a Shrimp Farm from a metal fabrication business but will remain under a B2 'Industrial use class for the purpose of this TS. The GFA of the conversion is approximately 7728sqm.
- 4.1.2 It is expected the shrimp farm will employ between 15-20 staff with core hours between 0800-1700hrs and will have 1 or 2 HGV arriving / departing during the week, with the product being distributed using smaller vans approximately 5 per week (for the purpose of the trip generation one van per day).
- 4.1.3 As a like for like B2 unit, further trip generation analysis is considered to be unnecessary.
- 4.1.4 The exiting access road will remain unchanged with the same sized vehicles using the access road and loading/ unloading at the rear of the building.
- 4.1.5 Pedestrian access will also remain the same from the southwestern side of the building.
- 4.1.6 Aside from introducing 2 EVCP, there is no proposal to amend existing car or cycle parking provision with 30 spaces to be retained on site (20 staff spaces + 10 visitor spaces).
- 4.1.7 The proposed site plan is presented as **Figure 4.1** below.

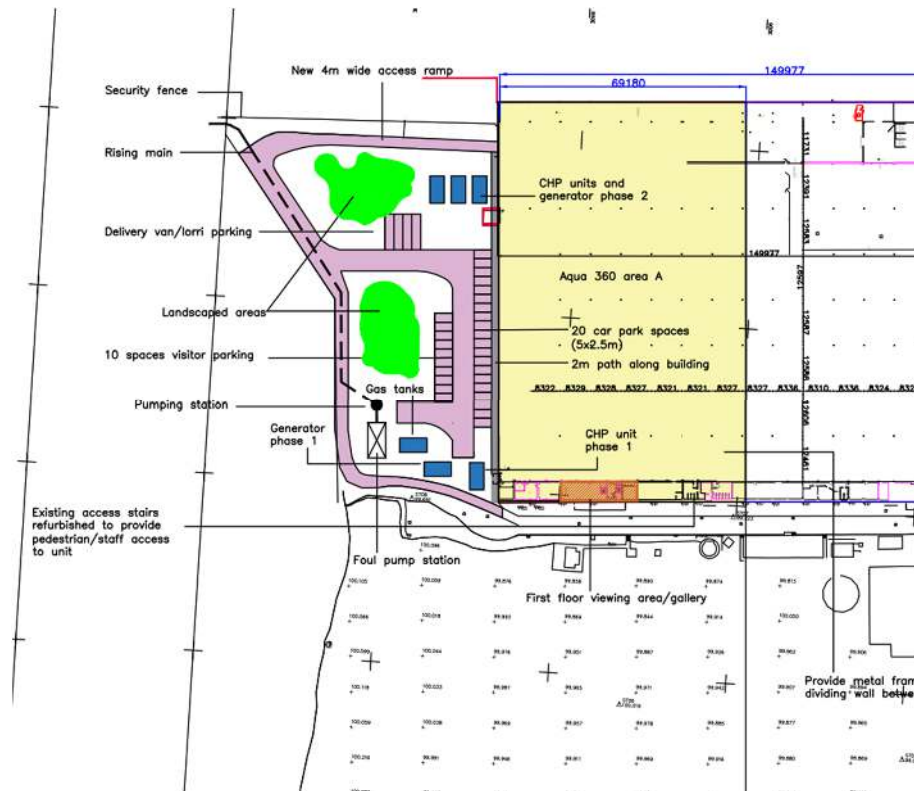


Figure 4.1 – Proposed Site Plan

4.2 Access Arrangements

- 4.2.1 Access arrangements will remain unchanged for the proposed conversion of the existing building.
- 4.2.2 This existing access is the primary access to the industrial park and can accommodate the proposed re-development in terms of geometry and there will be no increase in traffic when compared to the previous uses within the B2 Use Class (see Section 5 below).
- 4.2.3 See **Plate 1** illustrating the existing access arrangements below:



Plate 1 -Site Access Arrangements as existing (to remain unchanged)



- 4.2.4 The site access can currently accommodate all sizes of HGV's and will continue to do so in the future.
- 4.2.5 In this regard, the site access will remain unchanged for this proposed conversion application with no detriment to highway safety or free flow of traffic.

5.0 TRANSPORT IMPLEMENTATION STRATEGY

5.1 Introduction

- 5.1.1 The purpose of this TIS is to encourage modal shift for new and existing employees to more sustainable modes of transport thus moving away from a reliance on the private motor vehicle.

5.2 Baseline Conditions

- 5.2.1 Excellent footway connections are provided for as well as a crossing over the railway line ensuring no barriers to pedestrians and employees wanting to walk and/or use public transport.
- 5.2.2 Within 200m of the site entrance there are both northeast and southwest bound bus stops which include for bus layby, green surfacing, raised kerbing, shelter and flag.
- 5.2.3 These stops provide access to routes 87 and the X5 Cymru Skipper.
 - The route 87 provides a service between Swansea and Neath via Britton Ferry.
 - The X5 Cymru Skipper provides a service between Margam and Neath via Britton Ferry, Baglan and Port Talbot.
- 5.2.4 These services during the week run from approximately 0630 to 1900 at variable intervals, but intervals sufficient to ensure that travel to the site by bus is viable.
- 5.2.5 Cyclists are able to use wide carriageways ensuring no barrier to an employee wanting to cycle to work if convenient to do so.
- 5.2.6 In addition, and as a minimum the site will provide staff with:
 - Cycle stands; and
 - Changing areas

5.3 Proposed Measures

- 5.3.1 The following measures are proposed to enhance the sites sustainable credentials:

Travel Planning

- Travel information pack upon employment;
- Travel Information Boards in public areas;
- Promote public transport;
- Encourage car sharing;
- Provision of EVCP; and

5.4 Summary

- 5.5 In summary, the proposed development will continue to encourage alternative modes of travel to the private car and will be committed to providing support to employees where viably possible.



6.0 CONCLUSION

- 6.1 As set out within this TS the proposed conversion within the existing building will see a nett difference of zero when compared to the business that previously occupied this space.
- 6.2 Deliveries will be once or twice a week.
- 6.3 Distribution will equate to approximately 1 two-way trip per day using smaller 7.5T Box Vans.
- 6.4 The site access will remain unchanged, and no external works are required to the access road for the conversion and operation of the future business.
- 6.5 The development site is within a sustainable location with opportunity to use other modes of travel to the private car.
- 6.6 For the reasons set out in this TS, it is concluded that the development proposals will have no impact on the transport network and is not predicted to result in any material increase or a material change in the character of traffic in the vicinity of the site.



APPENDIX A

Pre-Application Response



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad	26th June 2023
Direct line Rhif ffôn	01639 686727
Email Ebost	c.hall@npt.gov.uk
Contact Cyswllt	Claire Hall
Your ref Eich cyf	
Our ref Ein cyf	Q2023/0100

Lisa Llewellyn
42 Gurnos Road
Ystalyfera
Swansea
Neath Port Talbot
SA9 2HY

BY EMAIL ONLY

Dear Sir/Madam

Town and Country Planning Act 1990

Pre-App. Ref.: Q2023/0100
PROPOSAL: Conversion of rear section of existing building to create a shrimp farm ('aquaculture') facility, including reconfiguration of roof to provide additional height clearance, ancillary alterations and new drainage
LOCATION: Former Metal Box Milland Road Industrial Estate Neath Neath Port Talbot SA11 1NJ

I refer to your correspondence received on 23 May 2023, concerning the above and your request for pre-application advice. Having considered the nature of submission, I respond as follows.

Local Context and Constraints

- DAM Maps Flood Zone C2, Risk Zone 3 Rivers and Sea
- Contaminated Land
- Low Risk Coal Area

Please note that this information is based on our current records and is, as far as possible, accurate. Nevertheless, we reserve the right to advise you of any additional constraints that may be identified at the time of your application.

Amgylchedd ac Adfywio

Ceri Morris Pennaeth Cynllunio a Gwarchod y Cyhoedd

Y Ceiau, Ffordd Brunel, Parc Ynni Baglan, Castell-nedd SA11 2GG

Ffôn 01639 686868

Environment and Regeneration

Ceri Morris Head of Planning and Public Protection

The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG

Tel 01639 686868

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

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

Relevant Planning History

From an examination of our records, the application site/ property has the following relevant planning history:

• P2022/0608	Change of use of vacant industrial floorspace (use class B2) to provide a first floor gym (use class D2) and ground floor cafe (use class A3)	Refused 20.12.22
• P2022/0396	External alterations to extend the cladding and associated works	Approved 21.6.22
• P2022/0395	External alterations to extend the cladding and associated works	Approved 16.6.22
• P2020/0729	Details pursuant to the discharge of Condition 4 (External Materials) of P2019/0176	Approved 18.9.20
• P2020/0731	Details pursuant to the discharge of Condition 5 (External Materials) of P2019/5082	Approved 18.9.20
• P2019/5082	Demolition of an existing building and erection of a new biomass boiler house building to house woodchip fed biomass plant (Max 2 MW thermal output), plus chimney and associated works.	Approved 3.10.19
• P2019/0176	Removal of existing roof structure and provision of new roof to an increased height.	Approved 9.5.19
• P2019/5155	Change of use of existing ancillary factory offices to self-contained speculative office units (Class B1). Plus rebuilding and enclosure of existing external fire escape staircase and alterations to existing entrance steps to provide disabled access lift.	Approved 21.8.19

Relevant Planning Policies

The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet its sustainable development (or wellbeing) objectives. This report has been prepared in consideration of the Council's duty and the "sustainable development principle", as set out in the 2015 Act. In reaching the recommendation set out below, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

National Planning Policy:

[Future Wales: The National Plan 2040](#) is the national development framework, setting the direction for development in Wales to 2040. The development plan sets out a strategy for

addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate resilience, developing strong ecosystems and improving the health and wellbeing of our communities.

The following policies are of particular relevance to the assessment of this application:

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

Policy 8 - Flooding

Policy 9 – Resilient Ecological Networks and Green Infrastructure

Policy 12 – Regional Connectivity

Policy 13 – Supporting Digital Communications

[Planning Policy Wales \(Edition 11, February 2021\)](#) outlines the Welsh Government's commitment to the importance of 'places' and 'place-making', the importance of using previously developed land wherever possible in preference to greenfield sites, and the recognition of the health and wellbeing related benefits by creating a sense of place and improving social cohesion. PPW 11 confirms that the environmental components of places are intrinsically linked to the quality of the built and natural environment and contribute to the health and wellbeing of the people who live, work and play there. It emphasises the importance of creating sustainable communities and reducing reliance on the private car as part of a package of measures to reduce the country's carbon footprint and help tackle the climate emergency.

The following guidance is of particular relevance in the assessment of this planning application:

5.4.3 Planning authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level. Development plans should identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing employment sites of strategic and local importance.

5.4.4 Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development.

6.7.6 In proposing new development, planning authorities and developers must....address any implication arising as a result of its association with, or location within.....areas where there are sensitive receptors.

6.7.7 To assist decision making it will be important that the most appropriate level of information is provided and it may be necessary for a technical air quality and noise assessment to be undertaken by a suitably qualified and competent person on behalf of the developer.

PPW 11 is supported by a series of more detailed [Technical Advice Notes](#) (TANs), of which the following are of relevance: -

- Technical Advice Note 5: Nature Conservation and Planning
- Technical Advice Note 11: Noise
- Technical Advice Note 12: Design
- Technical Advice Note 15: Development and Flood Risk
- Technical Advice Note 18: Transport
- Technical Advice Note 23: Economic Development

In addition to National guidance contained within Planning Policy Wales, any application would be considered against the Policies within Future Wales and the adopted Neath Port Talbot Local Development Plan, details of which are available on the Council's web site by visiting www.npt.gov.uk/ldp .The relevant policies would include:

Strategic Policies

- **Policy SP1** Climate Change
- **Policy SP2** Health
- **Policy SP3** Sustainable Communities
- **Policy SP4** Infrastructure
- **Policy SP5** Coastal Corridor Strategy Area
- **Policy SP11** Employment Growth
- **Policy SP15** Biodiversity and Geodiversity
- **Policy SP16** Environmental Protection
- **Policy SP18** Renewable and Low Carbon Energy
- **Policy SP20** Transport Network
- **Policy SP21** Built Environment and Historic Heritage

Topic based Policies

- **Policy SC1** Settlement limits
- **Policy I1** Infrastructure Requirements
- **Policy EC2** Existing Employment Areas
- **Policy EC3** Employment Area Uses
- **Policy EC4** Protection of Existing Employment Uses
- **Policy EN6** Important Biodiversity and Geodiversity Sites
- **Policy EN7** Important Natural Features
- **Policy EN8** Pollution and Land Stability
- **Policy TR2** Design and Access of New Development
- **Policy BE1** Design

Supplementary Planning Guidance:

The following SPG is of relevance to this application:

- Planning Obligations (October 2016)
- Parking Standards (October 2016)
- Biodiversity and Geodiversity (May 2018)
- Pollution (October 2016)
- Open Space & Greenspace (July 2017)
- Renewable and Low Carbon Energy (July 2017)
- Design (July 2017)

All of the above SPG can be viewed on the [Council's website](#).

The Placemaking Charter, of which Neath Port Talbot Council are a signatory sets out the following principles:

People and community

The local community are involved in the development of proposals. The needs, aspirations, health and well-being of all people are considered at the outset. Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality.

Location

Places grow and develop in a way that uses land efficiently, supports and enhances existing places and is well connected. The location of housing, employment and leisure and other facilities are planned to help reduce the need to travel.

Movement

Walking, cycling and public transport are prioritised to provide a choice of transport modes and avoid dependence on private vehicles. Well designed and safe active travel routes connect to the wider active travel and public transport network and public transport stations and stops are positively integrated.

Mix of uses

Places have a range of purposes which provide opportunities for community development, local business growth and access jobs, services and facilities via walking, cycling or public transport. Development density and a mix of uses and tenures helps to support a diverse community and vibrant public realm.

Public realm

Streets and public spaces are well defined, welcoming, safe and inclusive with a distinct identity. They are designed to be robust and adaptable with landscape, green infrastructure and sustainable drainage well integrated. They are well connected to existing places and promote opportunities for social interaction and a range of activities for all people.

Identity

The positive, distinctive qualities of existing places are valued and respected. The unique features and opportunities of a location including heritage, culture, language, built and natural physical attributes are identified and responded to.

The proposed development will need to address all of the above placemaking principles and the objectives for good design. How your proposals address all of these principles will be required as part of any Planning statement/ design and access statement submitted with your application. Your application will be assessed against these principles as they are key to ensuring that development positively contributes towards building sustainable places that support active and healthy lives.

Analysis of Proposal

Principle of Development

The application site lies outside of the designated Settlement Limits of the Adopted NPT LDP (LDP Policy SC1). Policy SC1 identifies 12 criteria whereby development will be permitted outside settlement limits and in all cases requires that they be of an appropriate scale and form.

Policy SC1 criterion 3 recognises that development may be permitted where it constitutes the suitable conversion of an existing building; in this case the application site/building is specifically designated within the Local Development Plan as an employment area under Policy EC2/5.

Supporting paragraph 3.0.16 goes on to state that *whether specific development proposals are appropriate or suitable outside settlement limits will be assessed with reference to the relevant topic policies within this Plan and national policy*. Supporting paragraph 3.0.17 states that *'employment use' relates to uses that provide significant employment opportunities as set out in Policy EC3*.

Policy EC2 states that:

'In order to protect the employment function of the County Borough's employment areas, uses on the following sites are restricted in accordance with Policy EC3: EC2/5 Melincryddan CMB/Milland Road Industrial Estate, Neath.'

Policy EC3 states that:

'Within allocated and existing employment areas, unless otherwise specified and where appropriate, uses will be restricted as follows:

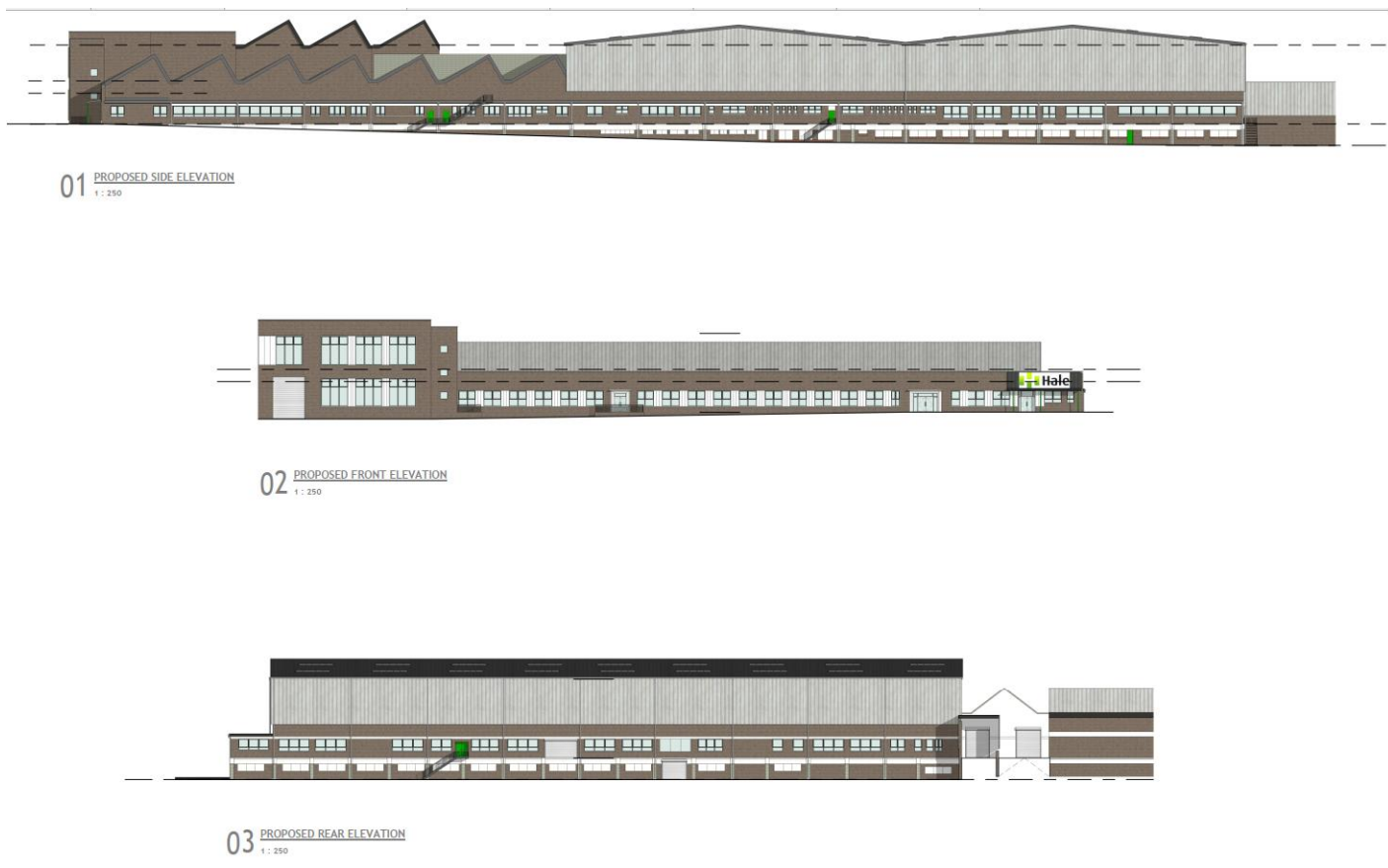
- ***Uses within classes B1, B2 and B8;***
- ***Ancillary facilities or services which support and complement the wider role and function of the primary employment use;***
- ***Commercial services unrelated to class B***

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.'

Given the industrial processing nature and character of the proposed development, it is considered that the proposals are acceptable in principle, subject to the above criteria and compliance with all other relevant development plan policies. In this regard, the determining issues are considered to be the impact of the proposed development in terms of design/visual appearance, amenity (particularly noise and odour), biodiversity, highway safety and drainage considerations.

Design/Visual Appearance

Subject to adherence to the biodiversity bat survey and licensing requirements (as detailed in the relevant section below), there is no objection in principle to raising the roof of the building to accommodate the additional head height for the proposed development. Planning permission was granted in 2019 for the adjacent industrial unit to raise its roof level (planning application ref. P2019/0176) and accordingly there may be a design/visual appearance benefit in altering the roof profile of this unit in a similar manner in order to maintain the building's symmetry. Extracts from the approved plans for the adjacent unit are set out below:



Consideration should be given to the inclusion of solar arrays on the new roof and/or other renewable energy features to assist with sustainable energy production to serve the proposed use which will likely be an energy intensive operation.

Amenity

Having regard to the precautionary requirements of TAN 11, the 'agent of change principle' enshrined within PPW11 and the Adopted 'Pollution' SPG, you will need to provide a noise impact assessment and odour management proposals to satisfy Policy EN8 requirements. The proposed use has the potential to conflict with adjoining business occupiers from noise and odour associated with the proposed development.

Biodiversity

As identified above, Policies EN6 and EN7 of the Local Development Plan will be of relevance insofar as there is a need to ensure any impacts on biodiversity/ natural features are appropriately assessed and, where applicable, mitigated.

Planning Policy Wales (PPW) 11 sets out that "planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity". This policy and subsequent policies in Chapter 6 of PPW 11 respond to the Section 6 Duty of the Environment (Wales) Act 2016.

The 'Dear CPO' letter from Welsh Government dated 23/10/2019 makes it clear that where **biodiversity enhancement** is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission.

Biodiversity enhancement is therefore necessary for all applications for development.

The building is a known bat roost and the works proposed may disturb their roosting places and/or affect their foraging behaviour. Accordingly, you are advised of the need to undertake a full bat survey, in line with Collins, J. (ed) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd ed). Bat Conservation Trust, London, which must be submitted to the Planning Authority for consideration as part of any planning application. A detailed bat methodology and mitigation plan must also be submitted. All surveys and mitigation plans must be undertaken by a suitably qualified ecologist.

All bats and their roosts are protected against disturbance under UK and European legislation. Where bats or their roosts are present at a site/building, no development can take place unless a licence to disturb these species and/or their roosts has first been granted by Natural Resources Wales ('NRW') in accordance with the relevant legislation. **NRW should therefore be consulted on the proposed bat survey, methodology and mitigation plans prior to being submitted.**

NRW can be contacted at:

Natural Resources Wales, Tŷ Cambria, 29 Newport Road, Cardiff CF24 0TP, tel. 0300 065 3000

Advice can also be obtained from the Bat Conservation Trust, who can be contacted at:

Studio 15, Cloisters House, Cloisters Business Centre, 8 Battersea Park Road, London, SA8 4BG, tel. 0345 1300 228

Advice from a suitably qualified ecologist should be sought. Biodiversity enhancements must be detailed in the planning application.

Highways & Drainage

The Highways Officer raises no objection in principle to development at this location, however they have identified the following items of concern which will need to be addressed as part of any subsequent planning application submission. The following documents are applicable to their assessment:

- Neath Port Talbot County Borough Council - Parking Standards (Oct 2016).
- Neath Port Talbot Highway Technical Design Guide for Residential, Commercial & Industrial 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

The following highway and drainage observations have been noted:

Highway observations

1. A full parking scheme needs to be provided for the proposal, including both operational and non-operational spaces, including a minimum 10% EVC spaces, disabled and secure cycle parking.
2. Delivery routes should be provided, showing access and egress and where these will be parked while loading/offloading. Also the route of staff and visitors access and egress should be provided.
3. A full Transport Impact Assessment is required for the development

Drainage observations

No objection, however it is noted that there is an intention to construct a new car park to accommodate the parking associated with development. This new car park would require a SAB approval.

Other Considerations

The application site is located in an area at risk from flooding (Zone C2 of the Development Advice Maps and Flood Zone 3 in the newer Flood Maps for Planning). Having regard to the precautionary requirements of TAN 15 and enshrined within Future Wales Policy 8, you will need to provide flood risk mitigation, resilience and evacuation proposals as part of the planning application.

Given the separate legislative requirements to obtain a bat licence and environmental permit for this development/site, you are strongly encouraged to contact Natural Resources Wales (NRW) to seek further pre-application advice – see note below for details of their pre-application services.

Given the water (supply and disposal) implications for the proposed development/site you are strongly encouraged to contact Dŵr Cymru Welsh Water (DCWW) to seek further pre-application advice – see note below for details of their pre-application services.

Sustainable Drainage – Statutory Requirements w.e.f January 2019

Please note that all new developments of more than 1 house or where the construction area is of 100m² or more will require sustainable drainage - built in accordance with mandatory standards for sustainable drainage published by Welsh Ministers - to manage on-site surface water. More information is available in [Schedule 3 of the Flood & Water Management Act 2010](#).

These systems must be approved by the Council's Engineering Service acting in its SuDS Approving Body (SAB) role **before construction work begins**. In this respect it is essential that a developer of any such project gain SAB approval of its surface water drainage alongside any relevant planning permission. **You will not be allowed to start construction until both permissions have been approved.**

If you have not done so already, and your development would not fall into any of the relevant exceptions¹, you are therefore strongly encouraged to request further advice from the SAB.

¹ Exceptions and exemptions, in summary, relate to:-

Involving the SAB Officers in pre-application discussions will allow for SuDS drainage matters (to ensure suitability of proposed SuDS design in line with national standards and adequate site layout) to be considered alongside the assessment of planning merits. **There is an additional charge of £250 for this service.** This can be as part of any agreed further pre-application submissions with the Planning Authority (recommended) or independently/ direct with the SAB. You are advised, however, that failing to engage in joint pre-application discussions has the potential to lead to delays and, most notably, the potential need to obtain further planning permission should any agreed SuDS design not be compliant with any relevant planning permission. Further details are available at www.npt.gov.uk/planning.

Section 106 Planning Obligations (if applicable)

The Council's approved [Planning Obligations Supplementary Planning Guidance](http://www.npt.gov.uk/planning) (SPG) provides the local policy basis for seeking planning obligations through Section 106 Agreements in Neath Port Talbot. The Council's approved SPG is also available to view/ download at www.npt.gov.uk/planning.

Viability

Where a developer/applicant indicates that they may be unable to provide the full affordable housing requirement or other planning obligations on viability grounds, they will need to submit a detailed financial assessment of the proposed development using the Council's Development Viability Model (DVM). For more information, please visit our [Viability Assessments for Planning Applications](http://www.npt.gov.uk/media/16366/section-106-obligations-viability-assessment-procedure-note-and-guidance-note.pdf) page and/or read the Council's Viability Assessment Procedure Note: <https://www.npt.gov.uk/media/16366/section-106-obligations-viability-assessment-procedure-note-and-guidance-note.pdf>.

Before submitting an application, and as part of any further pre-application discussions (which may require further charges), the Planning Officer will discuss the Council's expectations, and offer you the opportunity for a completed viability assessment to be submitted and reviewed prior to the planning application (subject to payment of the relevant charges outlined on the Council's website at <https://www.npt.gov.uk/30472>). Alternatively this can be at application stage, though we would always recommend initiating discussions at pre-application stage.

Required Supporting Documentation

We would encourage you to submit your application electronically via www.gov.wales/planningapplications.

Having regard to the nature of your proposal, it is considered at this stage that in addition to the submission of standard mandatory supporting documentation such as application forms, plans and fee, any application for the above development should also be accompanied by the following additional documentation: -

- Statement of how development complies with TAN15 / Flood Consequences Assessment
-
- Existing sites and developments with planning permission granted or deemed to be granted (whether or not subject to any conditions as to a reserved matter) or for which a valid application has been received but not determined by 7 January 2019. However, SAB approval will still be required if the planning permission was granted subject to a condition as to a reserved matter and an application for approval of the reserved matter is not made before 7 January 2020.

- Bat Survey(s)
- Bat Methodology and Mitigation Strategy/Plan(s)
- Details of biodiversity enhancements
- Construction and Environmental Management Plan ('CEMP')
- Contaminated Land Desk-top Assessment
- Transport Assessment
- Noise Impact Assessment
- Odour Control Management Plan and any associated Odour Abatement details/equipment
- Drainage proposals (including water source(s), storage, treatment and disposal arrangements)

If any subsequent application fails to include the information above, there is a chance it may not be registered and, in any event, it is likely that an application will either be refused or will not be able to be progressed until its satisfactory submission.

It is also this Authority's practice to recommend to applicants that detailed information is submitted at application stage to ensure that, in the event of planning permission being granted, that 'pre-commencement' conditions (which require approval of details prior to work starting on site) can be minimised. You are therefore encouraged to ensure that your initial submissions incorporate as much information as possible (for example materials, boundary treatment, ecology mitigation, Construction Management Plan, Travel Plan etc.), and address all matters raised in the advice given above.

Detailed guidance on the use of the national standard application form for planning permission and other associated consent regimes; and the information which must accompany a planning application so that the local planning authority can determine the validity of the application, can be found as follows: -

"Guidance on the use of the standard application form ('1app') and validation of applications":
<https://gov.wales/sites/default/files/publications/2019-03/section-7-annex-planning-applications-lists-of-validation-requirements.pdf>

The Town and Country Planning (Development Management Procedure)(Wales) Order 2012: <http://www.legislation.gov.uk/wsi/2012/801/contents/made/original/Order>.
 (Note subsequent Amendment Orders: [2014](#); [2015](#); [2016](#); and [2017](#)).

How we will deal with your planning application

As part of its emphasis on 'Delivering Quality Development Quickly', the Planning department prides itself on the service it offers our customers. Once your application has been received, this will include an allocated case officer making contact with you or your appointed agent within the first week and arranging a visit, following which we will contact you by phone or email to advise of any discrepancies with your application. We will also work with you to address any outstanding concerns, including any amendments required to make your proposal acceptable.

Once we are happy with the validity of your application, we will formally consult neighbours and relevant consultees. Provided there are no significant matters of concern resulting from such consultations, we will then seek to determine your application as swiftly as possible after the expiry of the statutory publicity period, and aim to do so within the 8 week statutory period.

While Officers will endeavour to ensure you are aware of the progress of your application, we would encourage you to contact the case officer should you wish to discuss any matter further.

Development Team Approach – Building Control

The Development Management and Building Control teams work closely to assist developers in improving the quality of their development and ensuring compliance with all appropriate conditions and Regulations. In particular, Building Control provide a competitive and highly professional service and seek to actively engage with developers at the earliest stage of their project. You are therefore encouraged to contact the Building Control team on 01639 686820 or by emailing building.control@npt.gov.uk to enter into early negotiations and understand the benefits of the Council's Development Team approach.

Requests for Further Advice

Following receipt of this initial advice, should you wish to discuss your scheme prior to formal submission, please contact the case officer on the direct number or email address given above. Further charges may apply.

Yours faithfully

Claire Hall

If you require this information in larger print, or in an alternative format, please contact the above named officer.

Seeking Pre-Application Advice from External Consultees

Natural Resources Wales (NRW)

Natural Resources Wales has a key role in the planning system and you may wish to hold pre-application consultation with them, utilising their pre-application service, so that environmental considerations are identified and addressed at the earliest opportunity. More information about Natural Resources Wales's pre-application service, including what advice can be sought for free, and what advice is subject to a fee can be found at:

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/?lang=en>

Dŵr Cymru Welsh Water (DCWW)

Welsh Water has a key role to play in the development and planning process as the services provided are at the forefront of public health and protection of the environment. Welsh Water encourages all developers to engage with them as early as possible in order to address any issues that may arise during the planning/construction process. Please also be advised that for any major development applications you will need to consult Welsh Water as a 'Specialist Consultee' by submission of the relevant information as set out in Schedule 1C, Article 2D of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

Upon receipt of a pre-application enquiry, Welsh Water will provide a written response advising whether the local network(s) can support the proposal, whether off-site water mains and/or sewers will need to be provided, and whether there are any apparatus located within the land you wish to develop and the requirements for these apparatus. This service is provided for a fee of £71+ VAT (**please refer to DCWW schedule of charges**) and can be submitted by post or by completing the online enquiry form at <http://www.dwrcymru.com/en/Developer-Services>. Further information can be obtained from the dedicated team of planning officers at Welsh Water on 0800 917 2652

Coal Authority

In line with many other statutory consultees, the Coal Authority no longer provides responses to pre-application enquiries without a charge. The Coal Authority therefore requests LPAs to direct applicants that are seeking pre-application advice regarding coal mining legacy issues because their site falls within the Development High Risk Area to them, so they may provide a quotation for providing advice.

Should only a small part of your site fall within the High Risk area, we would especially encourage you to engage with the Coal Authority, since they may advise in certain situations that a Coal Mining Risk Assessment is not required.

Further advice may be found at: <https://www.gov.uk/government/organisations/the-coal-authority>



APPENDIX B

Architects Plans



NOTES

Key

 Aqua360 land
 NPT land

A	Oc't23	Amended	CH
REV	DATE		BY CHKD

CLIENT

Aquaculture 360

PROJECT

Proposed Shrimp Farm
at Neath, Milland Rd,
SA11 1NJ

Red + Blue Line Plan

DRAWING ISSUE

Land Plan

GENERAL NOTES

A- The scale shown on this drawing only applies to the correct paper size.
B- Do not scale from this drawing take figured dimensions only.
C- Any discrepancies to be reported to *stob* consult.
D- Drawings in PDF format are not to scale and are for reference only.

DATE	Oct'23	PRODUCED BY	C.Holmes
SCALE	1:2000	CHECKED	
PAPER SIZE	A3	APPROVED	

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