

FULL PLANNING APPLICATION

UNIT D, NORTH BANK ROAD, PORT TALBOT, SA13 1RE

**PROPOSED CONSTRUCTION OF INDUSTRIAL BUILDING
TO SITE CLASS 7 TEST CENTRE FOR VANS AND CARS
AND LEASE REMAINING UNITS FOR B2 AND B8 USE**

PLANNING, DESIGN AND ACCESS STATEMENT

MARCH 2024



Geraint John Planning

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1.0 INTRODUCTION

- 1.1 This Planning Design & Access Statement has been prepared in support of a planning application, submitted on behalf of PTB Properties Ltd, in relation to the following development proposal:

'PROPOSED CONSTRUCTION OF INDUSTRIAL BUILDING TO SITE CLASS 7 TEST CENTRE FOR VANS AND CARS AND LEASE REMAINING UNITS FOR B2 AND B8 USE'

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 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

- 1.4 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 and the design objectives;
 - **Section 4** sets out relevant planning policy framework in relation to the site and the development;
 - **Section 5** outlines the pre-application feedback received from the LPA to date;
 - **Section 6** analyses the key planning considerations arising from the proposed development (in light of the planning policy context);
 - **Section 7** sets out our conclusions.
- 1.5 The following documents are submitted in support of the application, and should be read alongside this Planning, Design and Access Statement:
- Application Form;
 - Flood Consequences Assessment – Vale Consultancy;
 - Contamination Report – Terra Firma;
 - Preliminary Ecological Appraisal – Wildwood Ecology;
 - Green Infrastructure Statement – GJP Ltd;
 - Plans and Drawings – Gerald Blain Associates Ltd:
 - 01 Location Plan
 - 02 Existing Block Plan
 - 03 Proposed Block Plan
 - 04 Proposed Plans & Elevations
 - 05 Site Sections

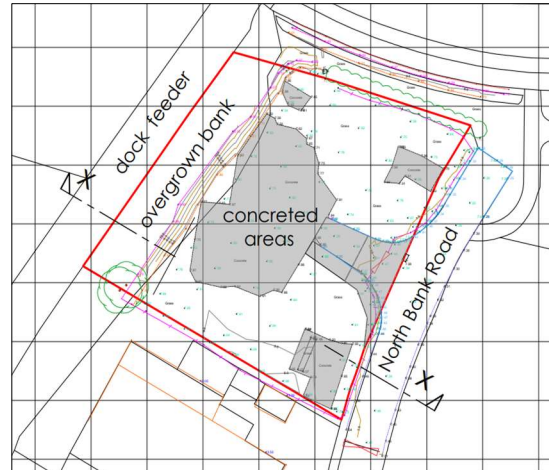
2.0 SITE AND SURROUNDINGS

The Site

- 2.1 The site comprises a parcel of broadly flat land located within The Docks, Port Talbot. The site is situated within the administrative area of Neath Port Talbot Council and the proposed area measures at approximately 0.23ha. Aerial views of the site are provided below:



Aerial view of the Site (site in red)



Existing Block Plan (dwg. 02)

- 2.2 The site comprises mainly hardstanding and overgrown vegetation. The site has previously been used to keep lorries but is now vacant. There is currently fencing on the eastern boundary, between the site and North Bank Road.
- 2.3 The site is bounded to the south by industrial buildings including Total Ground Care Ltd. To the west are mature trees and the Dock Feeder River, to the east the site is bounded by shrubs/grassland; and to the north of the site is the A4241 which links the site to the north and south of Port Talbot.
- 2.4 Photos of the site have been extracted below for reference:



View of the current site (north)



View of the current site (south)

Access

- 2.5 The site benefits from an existing access point that adjoins North Bank Road to the east. North Bank Road further adjoins the A4241 of which provides access to the wider surroundings of Port Talbot.



Access to the site off North Bank Rd

Site Surroundings

- 2.6 The site is surrounded by several industrial / commercial uses, as per the below aerial view extract:



Aerial view extract of site in context of surrounds

- 2.7 Some of the businesses in proximity to the site include:

- Total Ground Care;
- DWE Hydraulics & Pneumatics;
- Talbot Block;
- Network Rail IP Delivery;
- Exuma Plant; and
- Dyfed Steels Ltd.

Sustainability

- 2.8 In terms of sustainability, the site is accessible via / in proximity to the following forms of sustainable transport:

- Aberavon Council Bus Depot (services 9, 66, 82, 83, 84, 202) – 0.3 miles away; and
- Port Talbot Parkway – 1 mile away.

Site Planning History

- 2.9 A planning application history search has been undertaken via Neath Port Talbots Council's on-line planning register. Upon review of this data, the site is not subject to any previous planning history. Planning applications in the surrounding area of relevance are summarised below:



Site approx. in blue

The Surroundings					
Map Label	Application Ref.	Location	Proposal	Decision	Date of Decision
A	P2007/0248	SOUTH EAST OF RIVER AFAN AT JUNCTION OF DOCK ROAD/A4241 PORT TALBOT SA13 1RA	ERECTION OF A FOOT/CYCLE BRIDGE TO CROSS THE PDR STAGE 1C	Approved	Tue 03 Apr 2007
E	P1987/6222	LAND AT NORTH WHARF PORT TALBOT DOCKS PORT TALBOT	BUILDERS CONTRACTORS YARD	Approved	Tue 08 Nov 1988
B	T1978/2226	DOUCH & SONS PHOENIX WHARF THE DOCKS PORT TALBOT SA13 1RA	PLANT MAINTENANCE DEPOT	Approved	Thu 03 Aug 1978
C	T1977/1830	PORT TALBOT DOCKS PORT TALBOT	PLANT MAINTENANCE DEPOT	Approved	Mon 27 Feb 1978
D	T1977/1657	MARGAM ENGINEERING LTD NORTH BANK DOCKS PORT TALBOT	WORKSHOP EXTENSION	Approved	Fri 09 Sep 1977
D	T1974/0049	NORTH BANK PORT TALBOT	EXTENSION TO WORKSHOP	Approved	Tue 21 May 1974

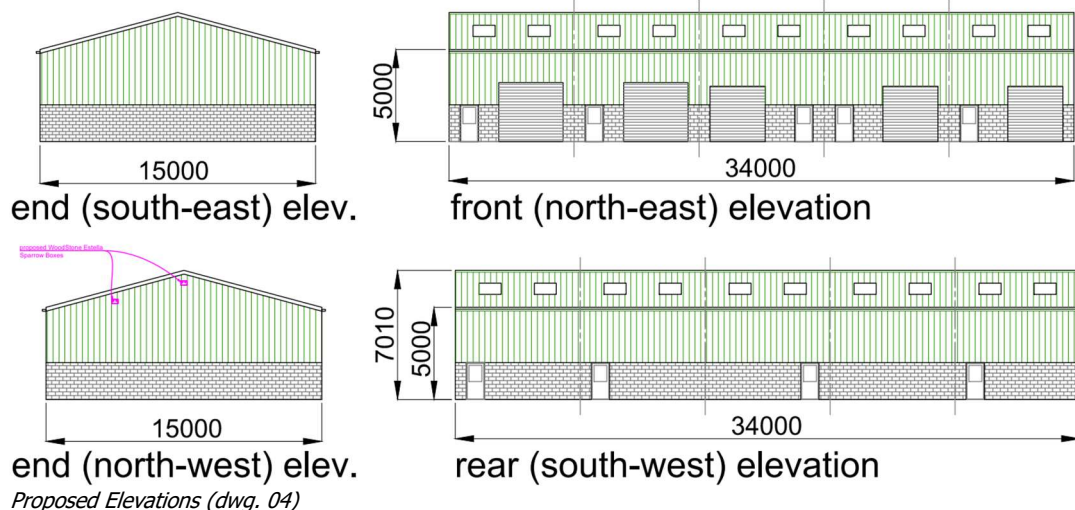
Surrounding planning history

- 2.10 Albeit outdated, the above table demonstrates that the surrounding area comprises light – heavy industrial land uses.

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 is for the construction of an industrial building that comprises 4 self-contained units. Units 1 and 2 will operate as a Class 7 Test Centre for Vans and Cars, whilst the remaining units (3, 4 and 5) are proposed to be leased for B2 and B8 uses. It is the intention of the Applicant to gain a flexible permission that permits a B2 / B8 use of units 3, 4 and 5, to allow for the ease of marketing to appeal to more end users. The proposed plans are outlined below for reference:





Proposed Floor Plans (dwg. 04)

Design Objectives

3.3 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".

3.4 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".

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

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

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

3.7 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

- 3.8 The site itself comprises 0.18 ha of regularly shaped and flat lying brownfield land capable of development.
- 3.9 On its eastern boundary, the site comprises an existing point of access that adjoins North Bank Road, providing efficient accessibility to main roads such as A4241 and A48. To the rear of the site (northwestern boundary) exists dense shrubbery / vegetation bank that acts as a natural barrier of separation to a stream – Dock Feeder.
- 3.10 By way of effective siting, the proposal has been set adjoining the southern curtilage of the site. This ensures the built form is set back from North Bank Road to allow for the efficient / ease of access, egress and manoeuvring of vehicles utilising the site.

Building

- 3.11 The development is for the construction of an industrial building that comprises 4 self-contained units with associated facility areas. Units 1 and 2 will form / be utilised as the Class 7 Test Centre, whilst units 3, 4 and 5 are proposed to comprise a flexible consent that permits B2 or B8 use. The flexible permission is sought to appeal to more end users for the ease of marketing the site post consent, and can be subject to a suitably worded condition.
- 3.12 The proposed building will measure at 34 metres in length along its frontage and 7.1 metres in total height. The roof is pitched at 15 degrees and will comprise 20 roof lights (4 per unit) with roller shutter doors and fire exit doors for each unit.

Scale, Amount and Appearance

- 3.13 The proposed built form comprises a footprint of 510sqm and will measure at 34 metres in length along its frontage and 7.1 metres in total height. The roof is pitched at 15 degrees and will comprise 20 roof lights (4 per unit) with roller shutter doors and fire exit doors for each unit. In terms of internal configuration, each unit size is proposed to measure 6.8m x 15m, and the Test Centre will be made up on units 1 & 2, thus comprising the larger footprint in comparison to units 3, 4 and 5.
- 3.14 The building is a steel-framed construction profiled with metal cladding and a pitched roof. The external materials proposed consist of steel profiled cladding, with the colours to be confirmed or conditioned as part of any planning approval.

Environmental Sustainability

- 3.15 The proposal comprises a range of environmentally friendly / sustainable aspects including the maintenance and enhancement of the existing vegetation at the rear of the site, a rain garden, a water butt and soakaway, and woodstone estella sparrow boxes.

Access and Movement

- 3.16 The site benefits from an existing point of access / egress which is to be utilised as part of the proposed development. The existing visibility splays are considered appropriate for the operations of the proposal. Likewise, the site comprises substantial area to allow for the manoeuvring of large vehicles. In terms of wider movement, the site is in close proximity to

pedestrian pavements / footways that provides access to various bus services approx. 7 minutes away. Access to and movement within the site is therefore considered to be appropriate in light of the proposal.

- 3.17 The height of roller 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

- 3.18 It is considered that the proposal has been appropriately designed to reflect and respond to the context of the location.



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

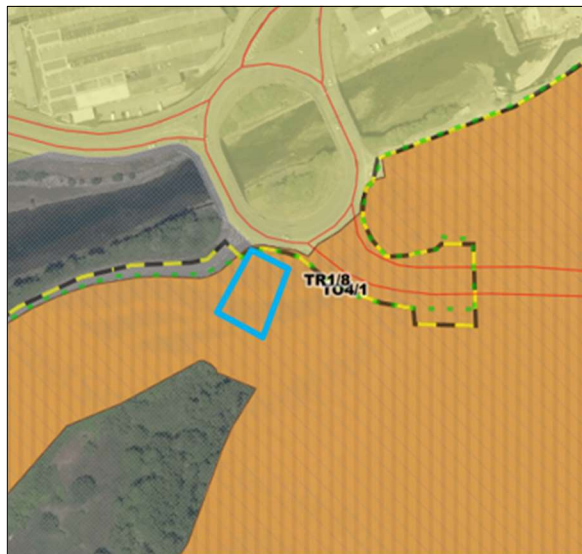
The following policy / guidance documents prepared at the national (Welsh Government) level are of relevance to the determination of this planning application:

- Future Wales: The National Plan 2040 (February 2021);
- Planning Policy Wales (12th Edition, February 2024); and
- Technical Advice Notes (TAN).

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

Local Planning Policy

- 4.3 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.



NPT LDP Proposals Map (site in blue)

Neath Port Talbot Relevant Policies Key	
	Settlement Limits
	House Allocation / Housing Landbank Site
	Strategic Employment Site
	Strategic Regeneration Area
	Retail Allocation
	Afan Valley Trail
	Wales Coast Path

- 4.4 Upon review of the above, the site comprises the following designations:

- Within Settlement Limits of Port Talbot (SC1);
- Within a Housing Allocation / Housing Landbank Site (H1/17);
- Within a Strategic Employment Site (EC1/4);
- Within a Strategic Regeneration Area (SRA 2 Harbourside);
- Within a Retail Allocation (R1/3);
- In proximity to the Afan Valley Trail (TR1/8); and
- In proximity to Wales Coast Path (TO4/1).

- 4.5 Taking into account the above proposals map, it is considered that the following LDP policies are of relevance to the determination of the proposal:

Policy	Title	Summary										
Policy SC 1	Settlement Limits	Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.										
Policy SP 5	Development in the Coastal Corridor Strategy Area	Policy SP5 sets out how the strategy to facilitate growth within Neath Port Talbot will be applied in the Coastal Corridor Strategy Area.										
Policy SRA 2	Harbourside Strategic Regeneration Area	The Harbourside SRA is an extensive area of brownfield former dockland close to Port Talbot town centre. It provides an important opportunity for comprehensive mixed-use development in a sustainable central location.										
Policy H1	Housing Sites	Land is identified for residential development at the following locations: <table><tr><th>Reference</th><th>Site Name</th><th>Settlement</th><th>Estimated Number of Units</th><th>Site Area (ha)</th></tr><tr><td>H1/171#</td><td>Harbourside</td><td>Port Talbot</td><td>385</td><td>10</td></tr></table>	Reference	Site Name	Settlement	Estimated Number of Units	Site Area (ha)	H1/171#	Harbourside	Port Talbot	385	10
Reference	Site Name	Settlement	Estimated Number of Units	Site Area (ha)								
H1/171#	Harbourside	Port Talbot	385	10								
Policy SP11	Employment Growth	The Harbourside SRA is an extensive area of brownfield former dockland close to Port Talbot town centre. It provides an important opportunity for comprehensive mixed use development in a sustainable central location. Existing employment uses will be supported and safeguarded and new and expanding employment developments will be encouraged.										
Policy EC 1	Employment Allocations	The following sites are allocated for employment use: <table><tr><td>EC1/4</td><td>Land within Harbourside SRA</td><td>7 ha</td><td>B1</td></tr></table>	EC1/4	Land within Harbourside SRA	7 ha	B1						
EC1/4	Land within Harbourside SRA	7 ha	B1									
Policy R 1	Retail Allocation	Land within the Harbourside Strategic Regeneration Area is allocated for bulky comparison goods retail in line with the Supplementary Planning Guidance.										
Policy TR2	Design and Access of New Development	New development will be required to demonstrate that it will have no adverse effect on the existing highway network and traffic or congestion will not be increased to unacceptable levels.										
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

- 4.6 Neath Port Talbot Council has prepared and adopted Supplementary Planning Guidance (SPG) which provides additional policy advice to be read in conjunction with the LDP.
- 4.7 The following SPGs are considered relevant to the determination of the proposal:
- Parking Standards (October 2016);
 - Design (July 2017); and
 - Port Talbot Harbourside & Town Centre Development Framework SPG.

Replacement Local Development Plan (RLDP) 2021-2036

- 4.8 Neath Port Talbot Council is preparing a Replacement Local Development Plan. It is not currently known when this will be adopted.
- 4.9 The Deposit Plan represents the first full draft of an emerging LDP which the LPA are currently preparing. There is therefore no policy / constraints map to consider as part of this at this stage.

5.0 PRE-APPLICATION ADVICE

- 5.1 A pre-application enquiry was submitted to NPT in August 2023. It was the aim of the Applicant to assess the principle of introducing a B2 use in an area allocated for B1 use under Employment Allocation EC1.
- 5.2 The analysis of the proposal was broken down into subsections, of which are extracted and summarised below.

Principle of Development

- Policy SC1 states that 'Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle'.*
 - Policy SRA2 identifies that the application site is located within the Harbourside Strategic Regeneration Area (SRA) which is designated for a mixed use development. The Harbourside SRA is an extensive area of brownfield former dockland located in close proximity to the Port Talbot Town Centre. In addition, Policy EC1 identifies that the Harbourside SRA has an employment allocation of B1 use. It is noted that the proposed use of the units would likely be B2 uses, which would not accord with the allocated B1 use for the locality, however, consideration is given to the fact that the site is located within a predominantly industrial location. Should a full planning application be submitted the applicant should demonstrate how the proposal would accord with policy SRA2 and EC1 of the LDP, and identify the proposed use class of the proposed units.*
- 5.3 Further dialogue with the LPA regarding their stance on the principle of the application confirmed the following:
- 'Policy EC1 identifies that the Harbourside SRA has an employment allocation of B1 use. It is noted that the proposed use of the units would likely be B2 uses, which would not accord with the allocated B1 use for the locality however consideration is given to the fact that the site is located within a predominantly industrial location'.*
 - 'Therefore, I do agree with your statement that while the identified use is for B1, there is potential for B2 uses to be considered acceptable and any application submission should demonstrate / justify the proposed use, as B2 uses are generally considered to generate more noise and disturbance than B1 uses'.*

Design and Visual Impact

- In terms of design and visual impact the proposed units would face onto North Bank Road with the north side elevation facing the A4241. Due to the curved design of North Bank Road, there is no established building line however the existing buildings to the south of the site are predominantly orientated perpendicular to the road. Notwithstanding this, it is noted that the site is constrained by an existing bund to the west and the parallel siting of the building to North Bank Road is not considered to be out of keeping with the locality. Furthermore, due to the sites location on the end of North Bank road and next to the A4241 the proposed orientation of the building is considered to reduce the visual massing of the building when viewed from the north.*
- Proposed building would measure 34m in width, 15m in depth and to a height of 7m and would be visible from busy A road to the north. The proposed composite cladding is not considered to positively contribute to the visual appearance of the building and due to the visibility of the units from the A4241 it is advised that an alternative material finish is proposed should a full planning application be submitted to provide a higher quality finish.*
- From undertaking a desk top assessment, vegetation is located around the boundary if the site and should a full planning application be submitted a landscaping scheme should be*

included, with the provision of boundary treatment for the site. The development should be designed to incorporate green infrastructure within the design where possible.

Parking and Highway Safety

- The application site benefits from an established access onto North Bank Road with a dead-end to the east of the site. A pedestrian and cycle path is also located to the east of the site. It is noted that the first unit would be for the use as a HGV MOT testing centre and should a full planning application be submitted the proposal would need to demonstrate adequate parking and turning on site for the vehicles together the sufficient parking for the additional 3no units.*
- The proposal would need to demonstrate accordance with the Parking Standards SPG and should a planning application be submitted the highway department would be consulted as part of the application. As noted above the site is located next to a cycle and pedestrian route and should a full planning application be submitted the applicant should consider and incorporate active travel as part of the 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. This is also reinforced by PPW 11.*
- Biodiversity enhancement is necessary for all applications of development. Accordingly, you are advised of the need to undertake an Extended Phase 1 habitat survey of the site for submission as part of your application.*
- It will be important to follow any recommendations made within the phase 1 survey, insofar as they relate to the need for further more specific surveys (e.g. bird surveys, reptile surveys) since failure to submit such additional surveys would mean that your application would be invalid.*
- You will also need to put forward proposals for mitigation/compensation for any adverse impacts identified in the above assessments. For smaller applications this can be in the form of integrated bat/bird bricks. For larger applications advice from a suitably qualified ecologist should be sought. Enhancements will also be required as part of the SuDs process but must be detailed in the planning application.*

Flooding

- The application site is located within flood zone C2 and within the Flood Maps for Planning (FMfP) flood zones 2 and 3. Although it is noted that an FCA has been submitted as part of the pre-application submission, should a full planning application be submitted NRW would be consulted as part of the application process.*

Land Contamination

- The application site lies in an area that has the potential of being contaminated from former industrial uses. As such as a minimum a desktop assessment would need to be submitted, which will assess the need for further site investigation and remediation.*

5.4 The comments received within the pre-application response from the LPA as outlined above will form the basis of discussion in more detail within Section 6 below – Material Considerations.

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;
- Design and Visual Impact;
- Parking and Highway Safety;
- Flooding;
- Biodiversity;
- Land Contamination; and
- Other considerations.

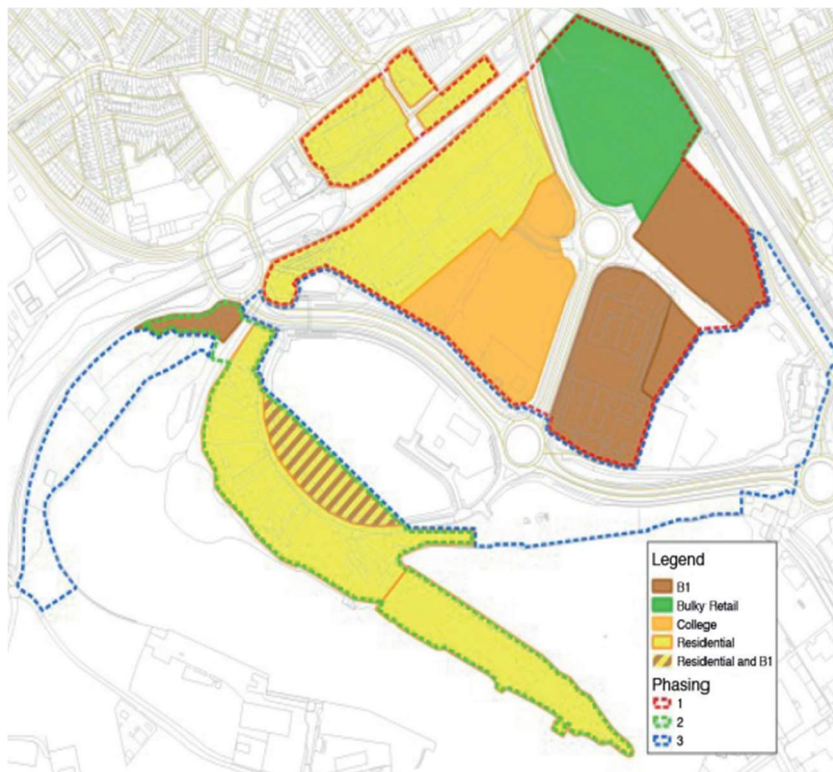
The Principle of the Proposed Development

6.2 The principle of development in this location is considered acceptable on the basis that the site is situated within the settlement boundary of Port Talbot, and is therefore located within an inherently sustainable location. This is supported and endorsed by Planning Policy Wales, Future Wales and Policy SC1 of the Neath Port Talbot Borough Council's LDP (2011-2026).

6.3 Under the current Local Development Plan, the site falls within the Harbourside Strategic Regeneration Area (SRA2). Under this designation, the site is allocated for the following uses:

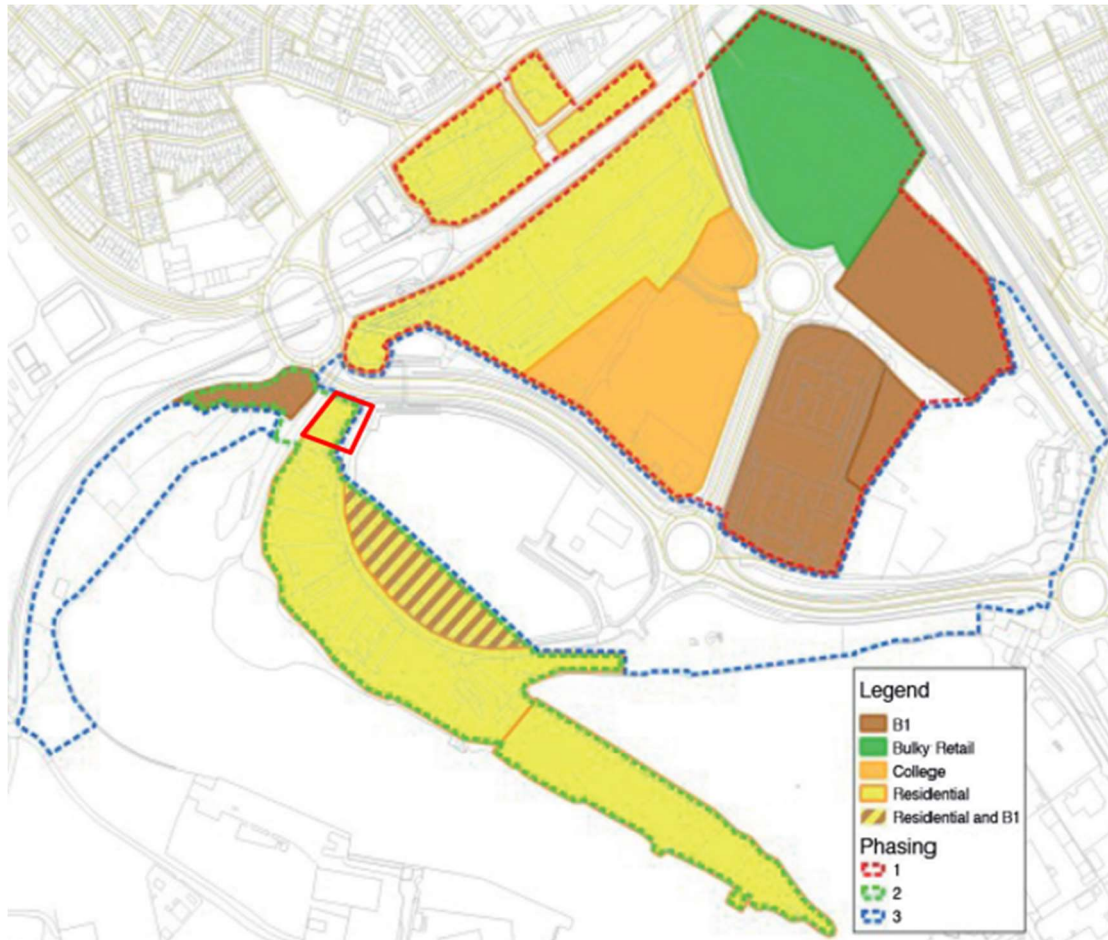
- Housing (H1/17);
- Strategic Employment (EC1); and
- Retail (R1).

6.4 The Harbourside SRA is an extensive area of brownfield former dockland close to Port Talbot town centre and is allocated under SRA2 for an opportunity for mixed use development in a sustainable central location. This is evidenced by the Harbourside Masterplan:



Harbourside Masterplan

6.5 The site location is overlayed onto the Harbourside Masterplan for reference:



Harbourside Masterplan (site outlined in red)

- 6.6 During pre-application discussions with the LPA, it was confirmed that given the site is set in a predominantly industrial location, and in an area of flood risk, there is potential for B2 uses to be considered acceptable. Further feedback suggested that any Full Planning Application should justify the proposed use, as B2 uses are generally considered to generate more noise than B1 uses.
- 6.7 As per Section 3 of this Statement, it is the intention of the Applicant to develop an industrial building on site, that comprises a Class 7 Test Centre in units 1-2, and to lease the remaining units 3-5 for B2 / B8 uses.
- 6.8 In light of the pre-app feedback received to date, and the development proposal, this Statement seeks to justify the proposal by assessing the proposed B2 (and B2 / B8) use at the site in light of the Harbourside Strategic Regeneration Policy – SRA2, and its potential impact on amenity. Under the regeneration policy, the site is allocated for the following uses:
- Housing (H1/17);
 - Strategic Employment (EC1/4); and
 - Retail (R1/3).
- 6.9 Upon review of the Harbourside Masterplan, the site is allocated specifically for Residential development. Notwithstanding this, each of the above designations will be reviewed and assessed separately below.

Housing (H1/17)

- 6.10 As per the Harbourside Masterplan outlined above, the site falls into an area allocated specifically for Residential Housing. Neath Port Talbot Council are currently in the process of replacing the currently adopted Local Development Plan. A call for Candidate Sites was carried out between November – December of 2023. The submitted sites have been uploaded to the LPA's interactive proposals map. Please see extract of this below:



NPT's RLDP Candidate Site Allocations Map (site outlined in blue)

- 6.11 As per the above, the site does not comprise any allocation, and a planning history search confirms that there has been no attempt to develop housing on this plot to date. It is appreciated that the RLDP is at pre-preferred strategy stage, and the allocations as outlined above have yet to be formally endorsed, however, there is a clear lack of endeavour to develop housing on the site. It could be argued therefore, that the site has been assessed unsuitable for the delivery of housing in the past / to date, and that future prospects of housing delivery is unlikely.
- 6.12 To reinforce the above position, a review of NPT's Annual Monitoring Report (AMR) (October 2020) was conducted, and more specifically Indicator 19, that stated '*The number of new housing units provided within the Harbourside SRA falls below the cumulative requirement for 2 consecutive years*' where just 32.4% of the annual target was delivered. This provides tangible evidence to conclude that the Harbourside Strategic Regeneration Area is not suitable for the delivery of housing. Further to this, annual monitoring of housing supply for the area in the last four years has ceased, due to the lack of demand to deliver residential development in the Harbourside. The prospects of housing being built on the site in the near future therefore is considered extremely low.
- 6.13 A potential reason for the lack of demand to develop housing at the site is its proximity to the water courses to the northwest (Dock Feeder and River Afan) and west (sea). An FCA carried out on the site concluded that the site is '*at Low Risk of flooding from all sources; fluvial flooding poses the greatest risk. The proposals are fully compliant with A1.14 and A1.15 of TAN15 and therefore the potential consequences of flooding are acceptable and manageable across the lifetime expectancy of the development*'. Notwithstanding this, a review of NRW's Development Advice Map and Flood Map for Planning concludes that the site is situated within an area of Zone C2 and B (an area that has been known to flood in the past and without any defence

infrastructure) and Flood Zone 2 (the combined 0.1% risk of flooding from rivers and the sea including climate change). Given that the area has flooded in the past, it is considered that the siting of use class orders of 'C' nature would face more severe implications in terms of impact compared to industrial uses such as B2 / B8. This is confirmed by TAN 15, that states: *'A flood event can have different consequences for different types of development, which influences where it is acceptable to locate development. For example, flooding in residential areas can result in a traumatic impact on lives. Other land uses, however, may be able to manage infrequent or low-level flooding in an acceptable way – flooding of this nature may be disruptive but unlikely to be dangerous'* (para 6.1). The guidance goes on to categorise residential uses as highly vulnerable development to flooding, and general industrial uses as less vulnerable development. Accordingly, it is considered that the proposed development of B2 and B8 uses at the site is more appropriate than the allocation for residential development given the potential flood risk of the site.

Strategic Employment (EC1)

- 6.14 Policy SRA2 (Harbourside Strategic Regeneration Area) states that the Harbourside presents an attractive area for mixed use development, including Employment-led development. Policy EC1 (Employment Allocations) states that in regard to employment uses, the land within the Harbourside SRA should only permit B1 use.
- 6.15 Upon review of Indicator 20 of NPT's Annual Monitoring Report (2020), the amount of land developed for employment uses within the Harbourside SRA falls below the cumulative requirement for 2 consecutive years. The report further confirms that *'There has now been no land developed for employment uses at Harbourside for four consecutive years'*, which is suggested to be as a result of negative influences such as flood risk and contaminated land.
- 6.16 In light of the lack of B1 employment delivery within the area, the existing land uses that surround the site comprise the following:
- W Corrigan Engineers – Engineer & Fabrication
 - Total Ground Care – Gardening & Landscape Unit / Yard
 - Glen Davies – Skips Hire & Recycling
 - Storage Yard – Lorries & Trailers
 - Docks Café – Café
 - DWE Hydraulics & Pneumatics – Hydraulics
 - Talbot Block – Builders Merchant Suppliers
 - Rail Network – Storage Yard
- 6.17 In light of the above, it is clear that the immediate surroundings to the site comprise established and active B2 uses – as agreed by the pre-app feedback. It is considered therefore that the proposal to site B2 / B8 uses immediately adjoining these uses is acceptable given it would assimilate well within the clearly industrial context of the area and would not result in an incongruous appearance or activity / use. Further to this, it could be argued that, given the predominantly industrial location of the area, that the siting of uses of B1 nature would appear incongruous to the existing spatial context of the area, and could result in the creation of amenity implications in the form of noise. Accordingly, it is not considered that the siting of B1 uses at the site is appropriate, nor likely to come forward within this adopted plan period, as suggested by the Annual Monitoring Report.
- 6.18 Paragraph 4.0.11 of Policy SRA2 advocates for the area to be developed for commercial development for small scale industrial uses. Paragraph 4.0.13 of the strategic policy states: *'In order to support the regeneration of the area and to give clarity about site constraints a masterplan will be published in the form of Supplementary Planning Guidance (SPG). The masterplan will provide guidance as to the type of development that the Council considers appropriate within Harbourside and the town centre, including residential units, bulky goods*

retail, education and business uses (offices, light industry and storage/ distribution)'. However, the SPG has yet to be formally issued. Notwithstanding this, given that the delivery of B1 uses at the site is evidenced to not come forward in the near future, as per the Annual Monitoring Report, it is considered that the siting of B2 and B8 uses at the site would be the most appropriate approach to accord with the aims of the strategic policy as it would comprise small scale industrial uses that would provide employment opportunities for the area. This meets the overarching aims of Policy SP11 (Employment Growth) as it provides additional employment within the Strategic Regeneration area. It is considered that a reluctant approach to providing consent for B2 / B8 uses on this site will result in the site remaining vacant due to the lack of demand to deliver B1 uses at the site.

Retail (R1)

- 6.19 In line with Strategic Policy SRA2, the Harbourside comprises a Retail Allocation – R1/3. Paragraph 5.2.41 of Policy R1 states '*At present there is poor connectivity to the town centre and as part of any development proposal the linkages will have to be improved and measures put in place to overcome the physical barriers (including the roads and railway lines) in order to ensure integration and linked trips to the town centre*'. In line with this point, it is not considered that the siting of retail uses in this location is considered appropriate, given its poor connectivity for pedestrians. It is inherently accepted that Retail Centres are located within town centre locations to allow for the ease of access for pedestrians, and their overall manoeuvrability. The siting of retail uses in any location are subject to sequential testing, to determine their appropriateness in achieving adequate footfall to reach the goal of improving the vitality / viability of an urban area – as promoted by Policy SP12. It is not considered that the location of the site would allow for the successful operation of a retail unit.

B2 use's potential impact on amenity

- 6.20 In light of pre-app feedback, the LPA suggested that B2 uses are generally considered to generate more noise and disturbance than B1 uses. Although this is appreciated and agreed, it is not considered that B2 and B8 use at the site would result in the production of noise levels that would be considered adverse in the existing setting. In light of the existing uses surrounding the site, it is not considered that the existing soundscape of particularly high quality. Therefore, given that the proposal is in-keeping with the existing uses at the site, it is not considered that the amenity of the area will be adversely impacted as a result of the proposal, as any noise produced from the proposal will be considered to replicate the existing soundscape.
- 6.21 Further to the above, given the predominant industrial setting, and the unlikely delivery of C3, B1, or R1 uses during this plan period, it is considered that the siting of uses that aren't of B2 / B8 nature would result in amenity being impacted giving the existing soundscape produced as a result of the nature of the existing surrounding uses.
- 6.22 Notwithstanding the above, the Applicant would consider the implementation of noise mitigation measures if it is considered that the proposal would result in adverse noise levels being omitted.

Interim Summary

- Upon review of the planning register, the Candidate Site Submissions for the RLDP, and the AMR, no attempt has been made to deliver housing on the site. It is considered that the site has been assessed as not suitable for housing by developers, therefore.
- The site is situated in an area known for flooding / flood risk, having been flooded in the past. TAN 15 advocates for less vulnerable uses such as light-heavy industrial to be sited within these areas. Accordingly, the site is not considered suitable to site residential,

employment (specifically B1) or retail uses given that these comprise highly vulnerable development.

- The immediate surrounds comprise established and active B2 uses, and the prospects of delivering the allocated B1 use is extremely unlikely, due to site constraints and general lack of demand. It is considered therefore that the proposal is acceptable given it would assimilate well within the clearly industrial context of the area. Further to this, it could be argued that, given the predominantly industrial location of the area, that the siting of uses of B1 nature would appear incongruous to the existing spatial context, and could result in the creation of amenity implications in the form of noise, as a result of the existing soundscape produced from the immediate setting. The siting of B2 and B8 uses at the site would also still accord with the aims of the strategic policy as it would comprise small scale industrial uses that would provide employment opportunities for the area.
- It is inherently accepted that Retail Centres are located within town centre locations to allow for the ease of access for pedestrians to boost the vitality / viability of an urban area. The siting of retail uses in this location is not considered appropriate, given its poor connectivity for pedestrians.
- For the reasons as summarised above, the proposal to site B2 and B8 uses at the site is considered entirely acceptable from the perspective of noise and amenity. Notwithstanding this, if considered necessary, the Applicant is willing to introduce noise mitigation measures if and suggested by the LPA.
- The proposal is considered the most appropriate use(s) for the site, and represents sound site-specific planning, as it maximises the development potential of a site in light of its spatial context and constraints.

Design and Visual Impact

- 6.23 Policy BE 1 of the LDP (Design) advocates for development proposals to demonstrate high quality design in light of the existing natural, historic and built environment, and that it contributes to attractive and sustainable places. The policy sets out a range of criterion that are considered to set out parameters to which a proposal must attend to, to accord with the design policy overall. The criterion of relevance to the proposal are set out below for reference:

'Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;*
- 3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;*

- 6.24 The siting of the proposal has changed from the pre-application submission. Notwithstanding the relatively positive assessment of the previous siting of the unit, it is now situated along the southwestern boundary of the site, perpendicular to North Bank Rd. This has been implemented to replicate the siting of the surrounding units that are also configured in this way, as it was considered that this responds more positively to the existing character of the surrounds, to ensure the proposal does not appear incongruous. The general siting, footprint, height and form of the proposal is considered acceptable, on the basis that it replicates the general industrial appearance that dominates the immediate surrounds.
- 6.25 In regard to the criterion 3 set out above, the proposed material finish to the building is proposed to be Kingspan RW 40mm Core Composite, as this replicates the existing material in the surrounds, providing an industrial street scene. In light of the pre-app response, the Applicant is looking to gain insight from the LPA as to what finish would be considered appropriate, and is seeking to have this imposed by way of condition. In terms of landscaping, the proposal comprises a range of hard and soft landscaping aspects. For example, as per *03 Rev A Proposed Block Plan*, a rain garden and additional planting is proposed to be sited along the frontage, rear and northern corner of the site. Further to this, the proposal looks to improve the current surface of the site through the introduction of additional concrete / paving. This will improve the manoeuvrability of the site for vehicles.
- 6.26 In light of the above, the proposal's design is considered acceptable as it is in-keeping with the existing streetscape and utilises appropriate materials and landscaping to ensure visual harmony with the surrounds. Accordingly, the proposal is deemed entirely acceptable in light of Policy BE 1.

Parking and Highway Safety

- 6.27 Policy TR 2 of the LDP requires for all new development proposals to demonstrate that it will have no adverse impact on the existing highway network, traffic, or congestion.
- 6.28 As set out by the pre-application response, the application site benefits from an existing point of access which is to be retained as part of the proposal. The proposal is therefore considered to be served by an acceptable level of access as it affords vehicles adequate visibility splays and, allowing the site to be exited in forward gear.
- 6.29 It is appreciated that there is a potential for x 4 new use classes to be operated on site, however, in terms of trip generation, it is not considered that the proposal would result in a material increase in traffic levels, and any additional vehicular movement is considered to be easily absorbed by the existing highway network.

6.30 In regard to parking provision, the proposal is to provide parking for the following:

- Units 1 & 2 – Class 7 Test Centre for vans and cars; and
- Units 3, 4 and 5 – B2 / B8 industrial use.

6.31 In light of the above therefore, the SPG standards of relevance are extracted below for reference:

Units 1 & 2 – Class 7 Test Centre for vans and cars

Type of Development	Operational	Non-Operational
Garages	1 car/lorry space per each car/lorry service bay	2 car/lorry spaces per each service bay

6.32 On the basis that the test centre will be for only vans and cars, it is not considered that provision is required for 'lorry' spaces / sizes. Accordingly, the above 'garages' bracket is considered appropriate to accord with.

6.33 Unit 1 and 2 comprise a service bay each, and therefore are provided 2 operational parking spaces, and 4 non-operational spaces. 6 parking spaces are provided in total.

Units 3, 4 and 5 – B2 / B8 industrial use

Type of Development	Operational	Non-Operational
Small Industry (< 235m ²)	1 van space	2 spaces

6.34 On the basis that the specific use of Units 3, 4 and 5 are not yet known, the parking provision is set out provisionally under the above 'small industry' bracket.

6.35 In line with the above standards, 3 spaces are required per unit, resulting in a total parking requirement of 9 spaces.

6.36 It is considered that the total parking requirement on site is 15 spaces. Please refer to the proposed block plan (03 Rev A) that evidences a total of 14 parking spaces on site. These include a combination of standard car parking units, as well as commercial spaces.

6.37 It is appreciated that the proposal currently falls short of the on-site requirement by 1 parking unit, however, reference is made to the size of Units 3, 4 and 5, only measuring at 102sqm each overall. This is only 2sqm over the size threshold of the previous bracket of parking requirement (< 100m²), which would otherwise be met on site. Accordingly, the parking provision on site is considered to be acceptable.

6.38 Further to the above, reference is made to the existing public parking provision within the surrounds, that is considered to absorb any residual parking demand not met on site:

- Cramic Way Car Park (0.7 miles away from site);
- Port Talbot Station Car Park (0.7 miles away from site); and
- Harbourside Car Park (0.7 miles away from site).

6.39 Overall, therefore, the proposal is considered acceptable in light of Policy TR 2, and NPT's Parking SPG.

Flooding

- 6.40 As stated previously, the site is designated within the Harbourside Strategic Regeneration Area. Paragraph 4.0.12 of the LDP states that the following regarding the area's flood risk:

'The Harbourside allocation area is affected by the risk of flooding, with significant parts identified as being within Development Advice Map Zone C. All development proposals within the Harbourside allocation will be required to demonstrate that they accord with national policy relating to flood risk as set out in TAN15, including provision for emergency access and egress in accordance with an agreed evacuation plan.'

- 6.41 NRW's Development Advice Map and Flood Map for Planning have been extracted below for reference:



NRW Development Advice Map (site approx. in red)



NRW Flood Map for Planning (site approx. in red)

- 6.42 As per the above extracts, it is clear that the site is at risk from flooding. The proposal is to site B2 and B8 uses at the site, which are considered entirely acceptable in line with TAN 15 and PPW 12 guidance as these uses are less vulnerable to the impacts of flooding. Accordingly, the development proposal is considered acceptable in terms of flood risk.

Biodiversity

- 6.43 Policies EN6 and EN7 of the LDP advocate for the mitigation of any impacts on biodiversity / natural features. Further to this, the recent updates to PPW promote the net gain of biodiversity enhancements, and request a Green Infrastructure Statement is submitted with any Planning Application – please refer to Green Infrastructure Statement submitted in support of this Application. The content of the statement outlines the biodiversity mitigation and enhancement measures proposed as part of the scheme, and accordingly, in light of this, it is considered that the proposal accords with Policy EN6, EN7 and PPW 12.
- 6.44 Pre-application feedback from the LPA requested an Extended Phase 1 habitat survey of the site for submission as part of this application – please find this enclosed with this submission. The PEA (carried out by Wildwood Ecology) confirmed that the site is constrained by Japanese Knotweed, and subsequently recommended an eradication programme. The Applicant confirms that they have contacted the local authorities for the removal of the Knotweed and have entered into 5-year contract on the removal of the evasive species on the land.

Land Contamination

- 6.45 Pre-application dialogue with the LPA confirmed that the site lies in an area that has the potential of being contaminated from former industrial uses, and recommended that a desktop assessment be carried out.
- 6.46 Please refer to enclosed Phase 1 Desk Study Report carried out by Terra Firma submitted in support of this application. The report sets out recommendations for further works that include: *'We would recommend ground investigation comprising trial pitting for chemical samples and shallow inspection and deeper boreholes for geotechnical design and gas well installation'.*
- 6.47 In light of the above recommendation, it is the Applicant's intention to have the recommended additional works imposed by way of a suitably worded condition on any approved Decision Notice.

Other Considerations

- Trees – no trees are to be cleared or felled as part of this application;
- Archaeology / Historic Environment – the site is not an area with high archaeological value, nor does it comprise historical designations; and
- PRoWs – 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.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 The proposed development seeks permission for the "PROPOSED CONSTRUCTION OF INDUSTRIAL BUILDING TO SITE CLASS 7 TEST CENTRE FOR VANS AND CARS AND LEASE REMAINING UNITS FOR B2 AND B8 USE".
- 7.2 It is considered that there are several material considerations in support of the application, which include the following:
- The development is located within the settlement of Port Talbot, complying with Policy SC 1 (Settlement Limits);
 - The site has been identified as falling within Harbourside Strategic Regeneration Area which is for mixed use development. This allocated site is brownfield land, which is currently vacant, therefore the principle of the development is considered appropriate;
 - It is considered that due to the site's location and constraints, it is not suitable to be built out for its allocated uses (housing, B1 employment, retail). This is evidenced by the Annual Monitoring Report that shows a lack of demand for these uses at the site, which is reinforced by a planning history search that evidences no attempt to develop the site for the allocated uses. The proposal is therefore considered the most appropriate use(s) for the site, and represents sound site-specific planning, as it maximises the development potential of a site in light of its spatial context and constraints;
 - The proposed development will assist in increasing economic activity within the locality by bringing about economic benefits to the local and wider region by way of creating further employment opportunities, in turn complying with Policy SP11 (Employment Growth);
 - The proposed development will coincide with the surrounding industrial land uses and accordingly, will not have any detrimental impact upon the amenity of adjacent occupiers including lighting, noise, or odour;
 - The site is constrained from the perspective of flood risk, however, in line with TAN guidance, the proposal is considered more appropriate than the allocated uses, and is therefore considered entirely acceptable from the perspective of flood risk;
 - The proposal is considered entirely acceptable from the perspective of highways and parking;
 - The proposal is considered acceptable from the perspective of ecology. The Applicant has entered into 5-year contract to remove evasive species on the land;
 - The proposal comprises a range of green infrastructure aspects to enhance biodiversity on site; and
 - The proposal is considered acceptable from the perspective of all other material considerations including heritage and public rights of way.
- 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 brownfield site in a strategic Regeneration site.
- 7.4 Accordingly, it is therefore considered that the proposed development is acceptable, and we would respectfully request that the application be approved.

Appendix 1 – National Planning Policies

NATIONAL PLANNING POLICY CONTEXT

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

Planning Policy Wales (Edition 12)

Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

People and Places: Achieving Well-being Through Placemaking

There are a number of key planning principles indicated within Figure 3 of Planning Policy Wales (PPW) to achieve the right development in the right place. These key planning principles are set out with a view to achieve a number of national sustainable placemaking outcomes, as explained in paragraphs 2.15-2.20 and outlined in Figure 4. The national sustainable placemaking outcomes are:

- *"Growing our economy in a sustainable manner"*
 - *Enables the Welsh language to thrive*
 - *Appropriate development densities*
 - *Homes and jobs to meet society's needs*
 - *A mix of uses*
 - *Offers cultural experiences*
 - *Community based facilities and services*
- *Making best use of resources*
 - *Makes best use of natural resources*
 - *Prevents waste*
 - *Prioritises the use of previously developed land and existing buildings*
 - *Unlocks potential and regenerates*
 - *High quality and built to last*
- *Maximising environmental protection and limiting environmental impact*
 - *Resilient biodiversity and ecosystems*
 - *Distinctive and special landscapes*
 - *Integrated green infrastructure*
 - *Appropriate soundscapes*
 - *Reduces environmental risks*
 - *Manages water resources naturally*
 - *Clean air*
 - *Reduces overall pollution*
 - *Resilient to climate change*
 - *Distinctive and special historic environments*
- *Creating & sustaining communities*
 - *Fosters economic activity*
 - *Enables easy communication*
 - *Generates its own renewable energy*
 - *Vibrant and dynamic*
 - *Adaptive to change*



- *Embraces smart and innovative technology*
- *Facilitating accessible and healthy environments*
 - *Accessible and high-quality green space*
 - *Accessible by means of active travel*
 - *and public transport*
 - *Not car dependent*
 - *Minimises the need to travel*
 - *Provides equality of access*
 - *Feels safe and inclusive*
 - *Supports a diverse population*
 - *Good connections*
 - *Convenient access to goods and services*
 - *Promotes physical and mental health well-being*

Figure 5 of PPW sets out themes that collectively contribute to placemaking which include strategic and spatial choices, productive and enterprising places; distinctive and natural places and active and social places. Para. 2.24 states that *"These themes draw together the linkages between planning policies to make it clear how individual components contribute to placemaking."*

Figure 7 sets out that sustainable benefits of development should be considered in the decision-making process, assessing social, economic, cultural and environmental considerations. More specifically, para. 2.27 outlines a number of key factors in the assessment process, including.

Economic Considerations

- "How the proposal would support the achievement of a more prosperous, low carbon, innovative and resource efficient Wales."

Environmental Considerations

- "Will the depletion of non-renewable resources be minimised, waste prevented, and the efficient and most appropriate use of materials made and re-use and recycling promoted;
- will the causes and impacts of climate change be fully taken into account through location, design, build, operation, decommissioning and restoration; and
- does it support decarbonisation and the transition to a low carbon economy."

Design

Para. 3.3 states:

"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surroundings area."

Figure 7 of PPW12 states the objectives of good design. These include considering access, movement, environmental sustainability, community safety and character.

Para. 3.7 outlines that *"Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution."*

Productive & Enterprising Places

Para. 5.7.6 states:

"The planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts. This forms part of the Welsh Government's aim to secure the strongest economic development policies, to underpin growth and prosperity in Wales, recognising the importance of decarbonisation and the sustainable use of natural resources, both as an economic driver and a commitment to sustainable development."

Para. 5.7.4 highlights the Welsh Government's commitment to the outcomes set out in Energy Wales: A Low Carbon Transition, prioritising *"reducing our reliance on energy generated from fossil fuels"*.

Green Infrastructure

Paragraph 6.2.12 states: *'A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal'.*

Future Wales: The National Plan 2040

Future Wales: The National Plan 2040 was adopted in February 2021 and replaces the Wales Spatial Plan as the national development framework setting the direction for development in Wales up to 2040. Future Wales represents the highest tier of development plan and focuses on solutions at a National Scale setting out a framework which will inform Strategic Development Plans at a regional level and Local Development Plans (LDPs) at local authority level.

The document consists of a development plan which aims to set out a strategy for addressing key national priorities through the planning system. These include, but are not limited to, developing a vibrant economy and improving the health and well-being of communities. The document is aware of challenges including the climate emergency and the ongoing effects of the global health pandemic and, in fact, aims to re-energise the economy in a sustainable way.

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

The Welsh Government states that *"The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure"*.

Policy 8 – Flooding

The Welsh Government states in the Plan that *"Opportunities for multiple social, economic and environmental benefits must be maximised when investing in flood risk management infrastructure. It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated"*.

Technical Advice Notes

Technical Advice Notes (TANs) supplement the policy principles of PPW and add further detail on issues which might affect development potential of the site. TANs which are considered relevant to the proposal and should therefore be given weight are:

TAN	Title
TAN 12	Design (2016)
TAN 15	Development, Flooding and Coastal Erosion (2021)
TAN 23	Economic Development (2014)

TAN 12 – Design (2016)

Further detailed guidance on the objectives of good design is provided within TAN 12. The objectives of good design are set out within the following categories:

Access

- Ensuring ease of access of all.

Movement

- Promoting sustainable means of travel.

Sustaining or Enhancing Local Character

- Promoting legible development;
- Promoting a successful relationship between public and private space;
- Promoting quality, choice and variety;
- Promoting innovative design.

Community Safety

- Ensuring attractive, safe public spaces;
- Security through natural surveillance.

Environmental Sustainability

- Achieving efficient use and protection of natural resources;
- Enhancing biodiversity;
- Designing for change.

TAN 15 - Development, Flooding and Coastal Erosion (2021)

This TAN gives technical information supporting the policies set out in PPW in relation to flooding and coastal erosion. It offers a basis within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed.

TAN 15 states: 'A flood event can have different consequences for different types of development, which influences where it is acceptable to locate development. For example, flooding in residential areas can result in a traumatic impact on lives. Other land uses, however, may be able to manage infrequent or low-level flooding in an acceptable way – flooding of this nature may be disruptive but unlikely to be dangerous' (para 6.1). The guidance goes on to categorise residential uses as highly vulnerable development to flooding, and general industrial uses as less vulnerable development.

TAN 15 states under Zone 3 (Rivers and Seas) that:

'Less vulnerable development will only be justified if:

1. There are exceptional circumstances that require its location in Zone 3, such as the interests of national security, energy security, public health or to mitigate the impacts of climate change; AND 2.
2. Its location meets the definition of previously developed land; AND 3.
3. The potential consequences of a flooding event for the particular type of development have been considered, and found to be acceptable in accordance with the criteria contained in section 11.'

TAN 23 – Economic Development (2014)

This guidance defines economic development as anything that that generates wealth, jobs and income. TAN 23 sets out guidance for LPA's when putting together Development Plans and planning for economic developments.

