

PLANNING DESIGN & ACCESS STATEMENT

Glyncorrwg Workshops **Glyncorrwg** **Port Talbot** **SA13 3EA**

June 2024



Summary

Proposal:

Development of 4 no. industrial workshop units (Use Class B2), highways arrangements, parking, drainage, landscaping and all associated works.

Location:

Glyncorrwg Workshops, Glyncorrwg, Port Talbot, SA13 3EA

Date:

June 2024

Project Reference:

S24.127

Client:

Neath Port Talbot County Borough Council

Product of:

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1.0 Introduction

- 1.1 This Planning, Design & Access Statement (PDAS) has been prepared by Asbri Planning on behalf of the applicant, Neath Port Talbot County Borough Council, in support of a full planning application to be submitted to the Neath Port Talbot County Borough Council for the proposed development of 4 no. industrial workshop units (Use Class B2), highways arrangements, parking, drainage, landscaping and all associated works at Glyncorrwg Workshops, Glyncorrwg, Port Talbot, SA13 3EA.
- 1.2 The purpose of this PDAS is to provide a clear and logical document to outline the planning considerations and planning policies relevant to this proposal. The document also acts as a method to demonstrate the details of the planning application in a way that can be read both by professionals and the public. It also explains the numerous facets of design and access relating to the site and to appraise the proposed development against relevant planning policies.
- 1.3 The diagram below, extracted from Chapter 3 of Planning Policy Wales 12, summarizes the five objectives of good design that should be considered when preparing a PDAS. The circular nature of the diagram represents the equal weightings that need to be given to each of the 5 Objectives of Good Design: Access; Movement; Character; Environmental Sustainability and Community Safety



- 1.4 As part of this application, the following application plans/drawings are submitted:

Drawing Name	Prepared By
Site Location Plan	EPT Partnership
Proposed Site Plan	EPT Partnership
Proposed Ground Floor Plan	EPT Partnership
Reflected Ceiling Plan	EPT Partnership
Roof Plan	EPT Partnership
Proposed Elevations	EPT Partnership
Proposed Sections	EPT Partnership
3D View	EPT Partnership
Proposed External Finishes	Bingham Hall
External Works Layout	Bingham Hall
Drainage Layout	Bingham Hall
Vehicle Tracking	Bingham Hall
Sub-structure Details	Bingham Hall

- 1.5 The following supporting documents are submitted alongside the Planning Application:

Document	Prepared By
Planning Application Forms	Asbri Planning
Drainage Strategy Report	Bingham Hall
Biodiversity Report	NPT Wildlife
Flooding Consequences Assessment	Bingham Hall
Soft Landscape Proposals	Cambium
Soft Landscape Management & Maintenance Plan	Cambium
Green Infrastructure Statement	Cambium
Plant Noise Assessment	Red Twin
Acoustic Design Review	Red Twin
Desk Study & Field Reconnaissance	SOCOTEC
Ground Investigation Report	SOCOTEC
Topographical Survey	Landmark Surveys Wales
Transport Technical Note	Asbri Transport
Vehicle Tracking	Bingham Hall
Tree Report	ArbTS

- 1.6 The Planning Design & Access Statement assesses the requirement of local and national planning policy relevant to the application site and is structured as follows:

- Section 2: Site Description & Surrounding
- Section 3: Planning History

- Section 4: The Proposed Development
- Section 5: Planning Policy Context
- Section 6: Key Planning Considerations
- Section 7: Conclusion

2.0 Site Description & Surroundings

- 2.1 The application site is located in the village of Glyncoirwg, situated approximately 13 km north east of Port Talbot. The application site is situated at the southern edge of the village and currently comprises 2 no. industrial warehouse unit and associated car parking, alongside amenity grassed areas.
- 2.2 The application site is accessed at the site's eastern boundary, via an unnamed road which links Park Street and Cymmer Road. The site benefits from good links to the surrounding highways network, with the access road linking to Cymmer Road. The subject is served by a dedicated car parking area, which surrounds the larger of the two industrial units.



Image 1: View of Approximate Site Location

- 2.3 In respect of surroundings, the unit is set in an area of mixed uses to the south of the village, including employment, assembly & leisure and residential. A playing field immediately adjoins the site to the north, whilst a mountain bike centre and campsite is found to the south and west of the site. Agricultural land is situated to the east of the site. The access road which serves the proposal runs adjacent to the site's eastern boundary. In terms of notable features, the Afon Corrwg is found approximately 50 metres west of the application site.



Image 2: View of approximate site location from access road

- 2.4 The application site occupies a sustainable location in close proximity to a range of services and facilities available in Glyncorrwg including a convenience store, public house, health centre, primary school. The nearest bus stop is located in Glyncorrwg, providing access to the 83 (Glyncorrwg) service.

3.0 Planning History

- 3.1 Asbri Planning have undertaken a review of the Neath Port Talbot online planning register, which did not identify any relevant historic planning applications associated with the subject site.

4.0 The Proposed Development

- 4.1 The development proposes the erection of an industrial unit, comprising 4 no workshops (Use Class B2), alongside highways arrangements, parking, drainage, landscaping and all associated works at Glyncorrwg Workshops, Glyncorrwg, Port Talbot.

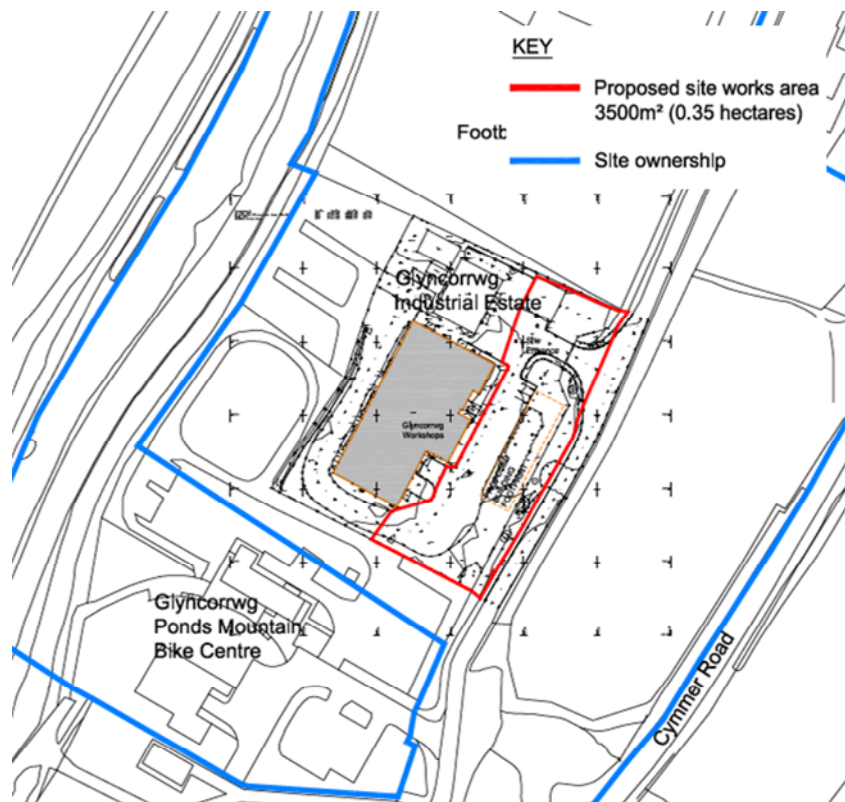


Image 3: Site location & proposed layout plan

- 4.2 The proposal will see the construction of an industrial unit, comprising 4 no. workshops, in the east section of the wider Glyncorrwg workshops site. The proposed development is sited in an area of the site which is currently utilised as a grassed amenity area. The unit is situated adjacent to the frontage of the existing workshops unit. The existing site access point is situated directly north of the proposed development.
- 4.3 The proposal is served by 18 no. car parking spaces, provided adjacent to the proposed frontage and south facing elevation. This includes 2 no. accessible car parking spaces.
- 4.4 The proposed workshops are functional in design and modest in appearance, corresponding with the existing Glyncorrwg workshops. The unit is a single storey in height with external walls of brickwork and

cladding. The unit frontage will benefit from 4 no. roller shutter doors providing access to each workshop, alongside entrance doorways. The proposals utilise a pitched roof with integrated translucent rooflight windows to provide natural light. Internally, each unit is provided with separated office space, W/C and breakroom.

Future Wales: The National Plan 2040

- 5.4 Future Wales is the highest tier of development plan in Wales. It is focused on solutions to issues and challenges at a national scale. Its strategic nature means it does not allocate development to all parts of Wales, nor does it include policies on all land uses. Nevertheless, planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.
- 5.5 Under Policy 1 the Welsh Government supports sustainable growth in all parts of Wales. The subject site is situated within the Swansea Bay and Llanelli National Growth Area, where employment, housing opportunities and investment in infrastructure will be directed.

Neath Port Talbot Local Development Plan 2011-2026



Image 5: NPT LDP Proposals map extract

- 5.6 The LDP Proposals Map indicates the subject site is located a short distance south of the defined settlement limit under **Policy SC 1**, which states:

“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. Outside settlement limits, development will only be permitted under the following circumstances:

1. *It constitutes a sustainable small scale employment use adjacent to a settlement limit*

Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form”.

- 5.7 The supporting policy text of Policy SC 1 indicates proposals for development outside settlement limits that can be justified under the terms of Policy SC 1 will be expected to be located near to existing development whenever possible.
- 5.8 Within the settlement hierarchy for Neath Port Talbot under **Policy SP 3 ‘Sustainable Communities’** Glyncorwg is identified as a small local centre with a defined role and function as a *“settlement with adequate public transport links with at least one shop and/or several community facilities”*.
- 5.9 Further, Policy SP 3 ‘Sustainable Communities’ states:

“The delivery of sustainable, healthy and cohesive communities and the conservation of the countryside will be promoted by:

 1. *Defining sustainable communities and locations for development by the identification of a settlement hierarchy that reflects the role and function of settlements;*
 2. *Defining settlement limits within which development which accords with the settlement hierarchy will be permitted in principle;*
 3. *Resisting inappropriate development outside settlement limits.”*
- 5.10 The Proposals Map indicates the application site forms part of an existing employment area under **Policy EC 2**. The site is identified under reference EC2/13 Glyncorwg Workshops, Afan Valley. Policy EC 2 states:

“In order to protect the employment function of the County Borough’s employment areas, uses on the following sites will be restricted in accordance with Policy EC3.”
- 5.11 The supporting policy text indicates the employment sites are well located and relate well to existing settlements and infrastructure and could therefore reduce the need for residents to travel further afield to access employment opportunities.
- 5.12 **Policy EC 3 ‘Employment Area Uses’** states:

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

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

Developments will be required to demonstrate that proposals do not cause any adverse impacts on the overall function of the employment area and neighbouring commercial and residential properties, the proposal can be sustainably justified in this location and is appropriate in scale and form to the role and function of the employment area."

- 5.13 In addition to its location adjoining the settlement boundary and forming part of an existing employment allocation, the proposed development is situated within the '**Valleys Strategy Area**' under **Policy SP 6**, which states:

"In the Valleys Strategy Area, the local economy and communities will be enhanced and reinvigorated and the distinctive environment will be protected through the following area-specific measures:

- *Safeguarding employment sites and uses;*
- *Taking a flexible approach to encourage employment uses"*

- 5.14 Further to the above, the supporting policy text indicates the strategy is centred on improving economic resilience with the encouragement of tourism, small scale employment and other economic developments.

- 5.15 In addition to the policies outlined above, the following policies are of relevance to the proposals.

Policy Reference	Relating to...
<i>Overarching Policies</i>	
SP 1	Climate Change
SP 2	Health
SP 4	Infrastructure
Policy I 1	Infrastructure Requirements
<i>Area Based Policies</i>	
SP 6	Development in the Valleys Strategy Area
SP 11	Employment Growth
EC 5	Employment Uses in the Valleys
SP 15	Biodiversity & Geodiversity

EN 7	Important Natural Features
SP 16	Environmental Protection
EN 8	Pollution & Land Stability
W 3	Waste Management in New Development
TR 2	Design & Access of New Development
BE 1	Design
SP 21	Built Environment and Historic Heritage

Supplementary Planning Guidance

5.16 Supplementary Planning Guidance (SPG) is produced to provide further detail on certain policies and proposals contained within the Swansea Local Development Plan (LDP). SPG do not have the same status as adopted development plan policies, however, they may form a material consideration in determining planning applications. The following SPG have been adopted:

- Parking Standards – 2016
- Biodiversity and Geodiversity – 2016
- Pollution – 2016
- Design – 2017

Planning Policy Wales Edition 12

5.17 In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, is “to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales”.

5.18 PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of ‘placemaking’ should be at the heart of the planning system. It is stated at Paragraph 2.8 that development proposals “must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act’s Sustainable Development Principle”. Paragraph 2.9 goes on to clarify that “The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making”.

- 5.19 PPW defines placemaking as follows: “Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well-being in the widest sense”.

Technical Advice Notes

- 5.20 In addition to the national policy guidance set out above, Technical Advice Notes (TANs) are land-use planning guidance documents issued by the Welsh Government to provide practical advice and guidance on areas of policy set out in Planning Policy Wales. TANs of relevance to the proposed development include:

- TAN 5: Nature Conservation and Planning
- TAN 11: Noise
- TAN 12: Design
- TAN 15: Development & Flood Risk
- TAN 18: Transport
- TAN 23: Economic Development

6.0 Key Planning Considerations

6.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- Principle of Development
- Sustainability
- Economic Development
- Design
- Noise & Residential Amenity
- Highways, Access & Parking
- Coal Mining Legacy
- Flood Risk
- Drainage
- Contamination
- Ecology & Biodiversity
- Trees & Green Infrastructure

Principle of Development

6.2 The application site is allocated as an existing employment site under Policy EC 2, where the site is identified as part of the Glyncorrwg Workshops, Afan Valley – reference EC2/13. Within these sites, uses are protected for employment related activities under Policy EC 3, which aims to ensure permitted uses only include Class B1, B2 & B8, ancillary development which supports the role and function of the wider employment use or commercial services unrelated to Class B use. As highlighted above, the development proposal comprises 4 no. workshops which are classified as employment uses. On this basis, the proposal will see the development of additional employment floorspace within an existing site safeguarded for employment uses – in accordance with Policies EC 2 & EC 3.

6.3 Importantly, Policy EC 3 indicates *"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."*

6.4 In response to the requirements outlined above, the development proposes a modest quantum of employment floorspace, which is clearly

subservient to the existing Glyncorrwg Workshops. By providing modern and adaptable employment floorspace it is envisaged the quality of employment use will be improved as a result of the proposals. The development will therefore ensure the function of the employment area is emboldened and maintained. The proposal can be sustainability justified and these requirements are discussed in the following section. It is considered the modest quantum of employment floorspace is appropriate and corresponds with the scale and form of the existing employment area.

- 6.5 Whilst it is acknowledged that the proposal is situated outside of the defined settlement limits, (albeit a short distance south of the settlement limits within an existing employment allocation) the proposal is directed towards brownfield land that is near an established settlement and is recognised as a 'small local centre' within the settlement hierarchy under Policy SP 3 'Sustainable Communities'. It is considered the proposals accord with the role and function of the settlement and will therefore maintain a sustainable community by improving employment floorspace provision. On this basis the proposal broadly accords with the high-level objectives of Policy SP 3.
- 6.6 In respect of the settlement limit, Policy SC 1 indicates outside of settlement limits, development will be permitted where it constitutes a sustainable small-scale employment use adjacent to a settlement limit. It is acknowledged the proposal does not directly adjoin the settlement boundary but is however located a short distance south of the settlement limit. The new building will be located adjacent to the existing industrial unit on site. It will also be of an appropriate scale and form, corresponding with the existing structures on site. The proposal can therefore demonstrate part adherence to the supporting justification text of Policy SC 1.
- 6.7 Further to the above, the application site is situated within the 'Valleys Strategy Area' under Policy SP 6 which seeks to enhance and reinvigorate such communities through the safeguarding of employment sites and by taking a flexible approach to encourage employment uses. The addition of employment floorspace at the subject site can be seen to accord with Policy SP 6 and represents the flexible approach required to encourage employment uses. The supporting policy text advocates for improving economic resilience and small-scale employment, which the proposal duly responds to.
- 6.8 In summary, we consider a robust principle for employment uses has been established at the subject site. The proposal demonstrates thorough adherence to the relevant planning policy as set out in the adopted LDP. This includes Policies EC 2, SP 3, EC 3 & SP 6.

Sustainability

- 6.9 In respect of previously development land, PPW indicates “Previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.”
- 6.10 The proposed development seeks to develop land within an existing employment allocation, and can therefore be considered a scheme which utilises previously developed, brownfield land – as opposed to creating a purpose built-new build facility on a new greenfield site which would result in higher levels of embodied energy as a consequence of the construction process. The development proposals also represents the most efficient use of brownfield land and adheres to Welsh government’s policy narrative for sustainable resource management.
- 6.11 Furthermore, the application site occupies a sustainable location within an established employment allocation and a short distance south of the defined settlement, in close proximity to services, facilities, community assets and public transport nodes.
- 6.12 To summarise, the location of the subject site allows sustainable modes of transport to be considered a viable alternative to private vehicles – therefore contributing towards achieving the modal shift in transport habits. As highlighted above, the proposal adheres to Policy SP 3 which seeks to create sustainable communities. Glyncorrwg is identified as a small local centre with adequate public transports links and facilities. To conclude, the proposed development can be considered sustainable, in accordance with both local and national level planning policy.

Economic Development

- 6.13 In respect of economic development and prosperity, PPW states “For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services”. The proposal will provide new, modern employment floorspace to complement the existing employment floorspace on site. The proposal therefore represents an opportunity to further economic development and prosperity in the community. Furthermore, PPW indicates “Wherever possible, planning

authorities should encourage and support developments which generate economic prosperity and regeneration". Accordingly, the proposals align with the generation of economic prosperity.

Design

- 6.14 The proposed workshops are functional in design and modest in appearance, corresponding with the existing Glyncorrwg Workshops. The unit is a single storey in height with external walls of brickwork and cladding. The unit frontage will benefit from 4 no. roller shutter doors providing access to each workshop, alongside entrance doorways. The proposals utilise a pitched roof with integrated translucent rooflight windows to provide natural light. Internally, each unit is provided with separated office space, W/C and breakroom.

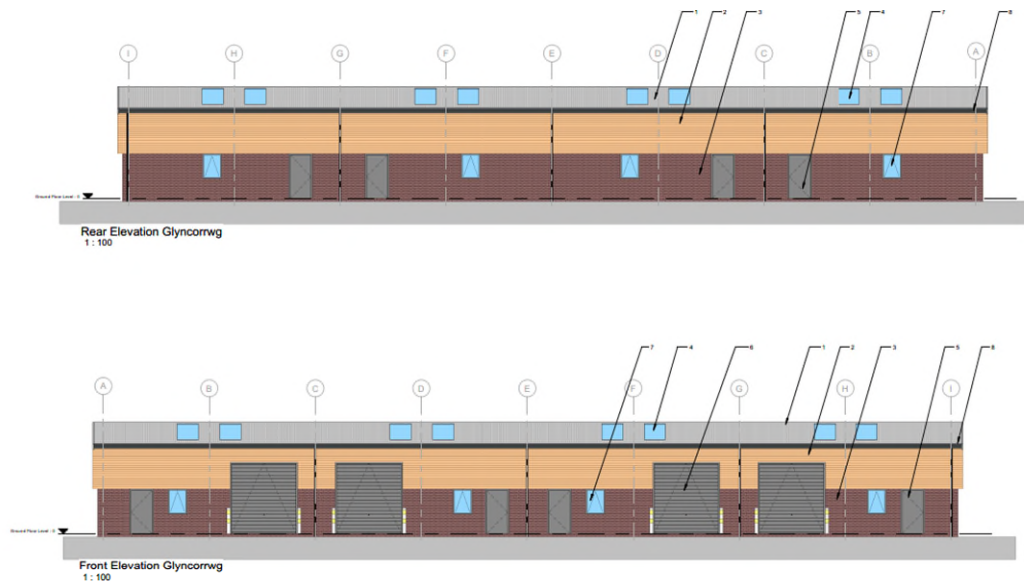


Image 6: Proposed front and rear elevations

- 6.15 The design of the proposal responds to the context of the site and the surrounding area. The visual appearance of the workshops is comparable to the existing industrial unit, albeit on a smaller scale. In order to respond to the pre-app comments the materials of the building have been uplifted to reflect a more natural appearance utilising cedar cladding on the upper sections of the elevations. It is considered the height and massing of the proposal is suitable for the character of the area, especially given the site's proximity to an existing industrial building.

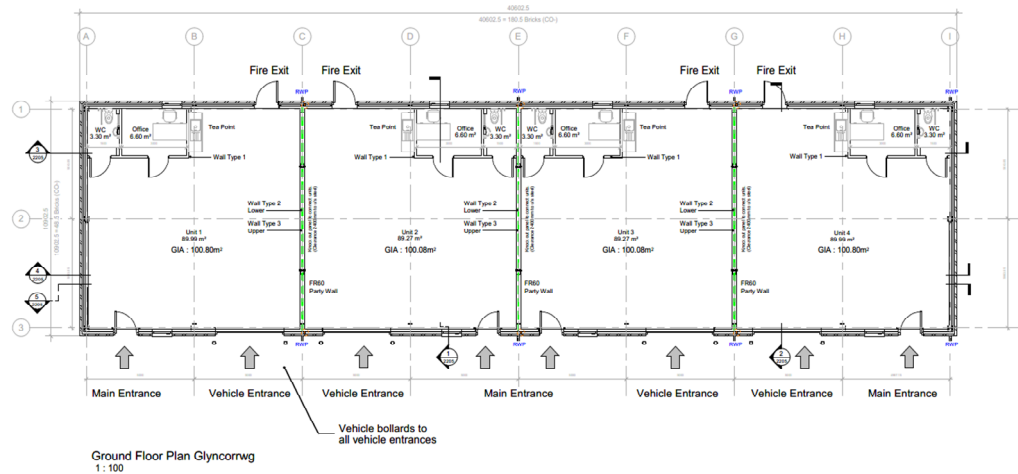
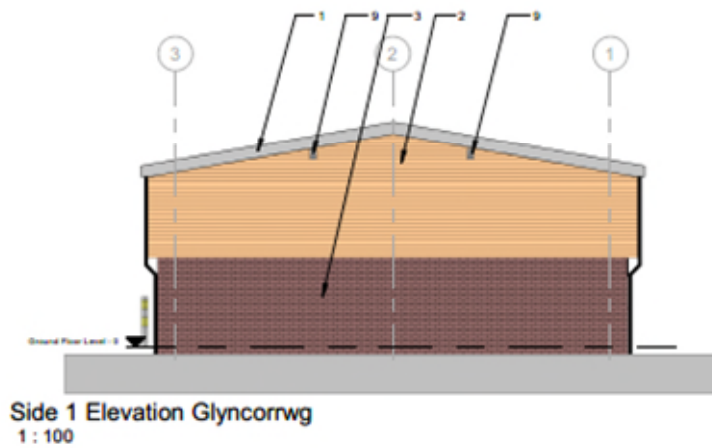


Image 7: Proposed floorplan

- 6.16 It is considered the proposal is in keeping with the immediate context and character of the area. It should be noted a landscape planting strategy has been utilised in order to ensure the proposal is well embedded within the landscape setting. Planting at the eastern boundary will ensure the development is not overly prominent in the street scene. To summarise, the proposal demonstrates compliance with Policy BE 1 'Design' of the adopted LDP.



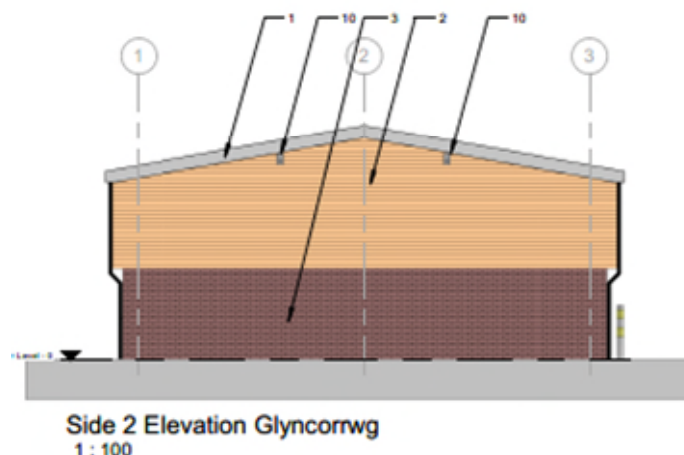


Image 8: Proposed side elevations

Noise & Residential Amenity

- 6.17 The application site is located approximately 200 metres south of residential properties. There is a playing field and community facilities separating the proposal and the nearest residential dwellinghouses at Park Street. On this basis, it is considered the proposal will not result in an unacceptable impact upon residential amenity. A suitable separation distance is present between the proposals and the nearest dwellings.
- 6.18 In order to quantify the acoustic impact of the proposals a Plant Noise Assessment and Acoustic Design Review have been prepared by Red Twin. The Plant Noise Assessment finds that the proposed plant will be similar in context to the neighbouring industrial units and the proposed location is not sensitive to the inclusion of new building services plant. In respect of the assessment of noise impact, It is not known where potential plant is to be sited, and so it is assumed a worst-case scenario of the plant being located externally, at the nearest part of the building to the nearest noise sensitive receiver.
- 6.19 The proposed units are commercial/industrial in nature and the fixed plant servicing them would operate in a continuous manner, much like the road traffic noise and other existing plant currently affecting the area. The Assessment concludes that the new sources would not be noticeable as out of character with the ambient noise in this area and no adjustment to the targets in the standard are necessary. In summary, It is likely that the proposed mechanical plant will be of a low impact during the day and night period.
- 6.20 In respect of internal noise conclusions, the Acoustic Design Review expects the target internal noise levels to be achieved without needing

to specify the acoustic performance of the building envelope. The derived performance requirements are not overly onerous and are expected to be readily achieved with standard building materials. In summary, The design of the building can be demonstrated to achieve the acoustic performance requirements subject to the design recommendations stated.

Highways, Access & Parking

- 6.21 Vehicular and pedestrian access will be achieved utilising the existing access/egress arrangements from the access road which serves the Glyncorrwg Workshops. It is considered the existing access arrangements that serve the Glyncorrwg Workshops are suitable to accommodate the proposed development. In respect of internal movements, the existing Glyncorrwg Workshops benefits from a large area for car parking, servicing and deliveries. It is anticipated the addition of the proposed workshops will not prejudice the ability of vehicles to enter the site, manoeuvre to turn and then leave the site in a forward gear.



Image 9: View of Existing Parking Area and Approximate Site Location

- 6.22 It is anticipated the transport implications of the scheme will remain broadly comparable to the transport environment currently observed at the subject site. On this basis, we believe the transport implications of the scheme are acceptable.
- 6.23 In respect of parking provision, the application site benefits from a substantial level of parking provision with-in the site. It is envisaged the existing car parking provision at Glyncorrwg Workshops is more than capable of accommodating the anticipated parking demand. The proposal provides 18 no. car parking spaces, including 2 no. accessible spaces.
- 6.24 Parking spaces are not currently delineated within the Glyncorrwg Workshops site, so parking is to some extent ad hoc. Whilst the site has a theoretical capacity to accommodate the proposal, the scheme will result in formalised parking to cater for the proposed users whilst also accommodating existing users. Large areas of hardstanding will remain and enable parking to still takes place elsewhere on the site without spilling out onto the public highway. Importantly, this will not prejudice the safe operation of vehicular movements within the site.
- 6.25 A Transport Technical Note has been prepared by Asbri Transport Ltd in support of the proposals. The Statement provides the following findings and recommendations:
- In respect of highway safety, It was observed that no collisions have occurred within the local area within the latest 5-year period.
 - Vehicular access is proposed via the existing priority junction on Park Street. This access junction serves existing light industrial land use currently occupied by MPN Windows. The existing access has a visibility splay that complies with current technical standards as detailed in Manual for Streets. Pedestrian access will be via the existing footways either side of the access road.
 - Based on the adopted NPT Parking Standards SPG, a total of 6 parking spaces are required and 100m² of operational space. The proposal will provide a total of 18 parking spaces, two of which will be marked for use by disabled motorists including a 1.2m hatched and 2 will be for EV charging.
 - To assess the impact of the site on the existing transport infrastructure, it is necessary to assess the likely level of vehicular trips generated by proposed employment use on the site. The findings demonstrate the proposed development would likely generate up to 7 and 6 two-way vehicular movements during the AM and PM peak hours respectively. Daily, the site could generate up to 29 two-way

vehicle movements. It can be considered that this likely level of movement will have a marginal impact on the highway network.

- 6.26 On this basis, the proposed development complies with the requirements of the adopted Parking Standards SPG. To conclude the proposed development adheres to Policy TR 2 'Design & Access of New Development'.

Coal Mining Legacy

- 6.27 As previously noted, the site is located within the Coal Mining Reporting Area but is outside of the High-Risk Development Area. As confirmed in the pre-application advice provided by the LPA, the planning application does not require a supporting Coal Mining Risk Assessment.

Flood Risk

- 6.28 The NRW TAN15 online Development Advice Map viewing indicates the application site is situated within Flood Zone C2 – without significant flood defence infrastructure. On this basis the application should be supported by a Flood Consequences Assessment.



Image 10: NRW TAN 15 online mapping extract

- 6.29 The Flood Map for Planning indicates the site comprises areas Flood Zone 2 and 3 in respect of flooding from the sea and rivers, as indicated on the mapping extract below. Areas of Flood Zone 2 & 3 in

respect of surface water drainage and small watercourses are found on site.

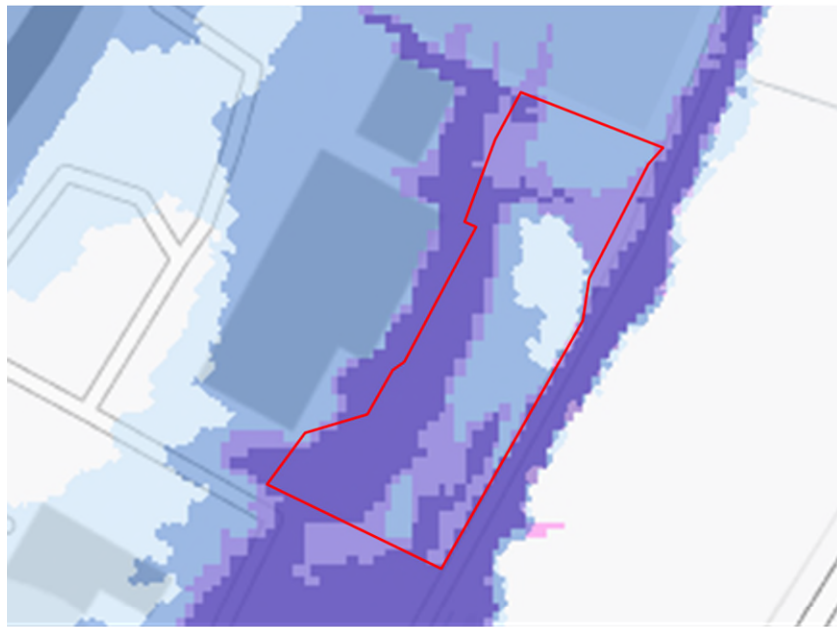


Image 11: Flood Map for Planning online mapping extract

6.30 The proposed development represents 'less vulnerable development' that should be considered acceptable in areas of Flood Zone C2 subject to the justification test.

6.31 The justification tests of TAN15 are set out as follows:

"All other new development should only be permitted within zones C1 and C2 if determined by the planning authority to be justified in that location. Development, including transport infrastructure, will only be justified if it can be demonstrated that:-

- i. Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; or,*
- ii. Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region;*
- and**
- iii. It concurs with the aims of PPW and meets the definition of previously developed land (PPW fig2.1); and,*
- iv. The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in sections 5 and 7 and appendix 1 found to be acceptable."*

6.32 As highlighted in preceding sections, the proposal will create additional employment floorspace at an allocated and safeguarded site for employment uses. On this basis, the proposal and its location is necessary to contribute to key employment objectives. Furthermore, the proposal is previously developed, brownfield land and concurs with the aims of Planning Policy Wales Ed. 12 – as roundly demonstrated by this Statement.

6.33 The Flood Consequences Assessment, prepared by Bingham Hall in support of the proposals provides the following findings and recommendations:

- The Development Advice Map shows that the site lies within Flood Zone C2, an area of the floodplain without significant flood defence infrastructure. The site is at a risk greater than 1.0% each year for flooding to occur as a result of overtopping of the Afon Corrwg. Other sources of flooding were generally considered low to negligible risk without any proposed mitigation measures.
- The site is classified as being 'previously developed land' and in line with Planning Policy Wales guidance, the development aims to make the best use of an existing land whilst not exacerbating flood risks elsewhere.
- Flooding of the property itself is deemed acceptable at a depth of 300mm in the extreme event.
- The proposed development is Industrial, defined within TAN15 as a 'Less Vulnerable' development and utilises a brownfield site. Therefore, the site, although located within a flood risk zone complies with TAN15's development category and justification requirements
- The site meets the justification and acceptability criteria for the type of development under consideration outlined in TAN 15 planning policy, subject to mitigation measures and the inclusion of flood resilient design.

6.34 In summary, it has been demonstrated how the proposals have satisfied the relevant TAN 15 tests to confirm the acceptability of the proposals in respect of flood risk.

Drainage

6.35 The Flood and Water Management Act 2010 (Schedule 3) establishes SABs in County Councils and requires new developments to include Sustainable Drainage Systems (SuDS) features that comply with national standards.

- 6.36 All new developments of more than 1 dwelling house or where construction is 100m² or more will need to submit a SuDS application demonstrating compliance with the statutory SuDS standards for the design, construction, operation and maintenance of surface water drainage systems serving new developments. As such, the proposals must demonstrate how it will ensure that the SuDS standards are adhered to.
- 6.37 A Drainage Strategy Plan has been prepared by Bingham Hill in support of the proposals, demonstrating how the development utilises the Sustainable Drainage features in the conveyance of surface water. This includes a swale to the south of the workshops, designed to store and convey surface water runoff.

Contamination

- 6.38 The pre-application advice provided by the LPA indicates the development site is located in an area that has the potential of being contaminated from former industrial uses and coal mining. A desktop assessment is therefore required in support of the application.
- 6.39 A Desktop Contamination Assessment has been prepared by SOCOTEC in support of the development proposals. The Assessment provides the following findings and recommendations:
- The Field Reconnaissance Identified waterlogged ground surface, confirmed absence of chimney noted on historic site plan (though footprint still remains) and the location of an electricity substation attached to the existing Cwmgorr workshops building.
 - Geohazards and Geotechnical considerations all very low or negligible.
 - Moderate risk of migration and inhalation of coal mine gas from disused shafts and workings.
 - Adjacent site users include metal manufacturing and fabrication and vehicle repair, testing and servicing.
 - The Desk Study recommend undertaking a combined Tier 2 Geoenvironmental and geotechnical investigation and assessment to test the Preliminary Conceptual Site Model and engineering geological model. Confirm presence and thickness of Made Ground via intrusive investigation and composition of underlying superficial deposits, presence and extent of coal seam via intrusive investigation.
 - In respect of further investigations, the Desk Study recommends a proposed GI to include one cable percussion borehole to refusal (anticipated shallow), four dynamic sampler boreholes with gas and groundwater standpipe

installations for post-fieldwork monitoring and six DCP tests.
Conduct geoenvironmental and geotechnical testing.

6.40 Subsequently, a Site Investigation Report was prepared by SOCOTEC in May 2024, to provide geoenvironmental and geotechnical parameters for the design and construction of the proposed development. The Report provides the following findings:

- The scope of the investigation was specified by SOCOTEC and comprised boreholes, field testing, monitoring, laboratory testing and reporting.
- The Made Ground and natural Till are unsuitable for foundation purposes. All foundations should be designed to transfer loads of the proposed development to the underlying bedrock, the Brithdir Member. The depth of the bedrock was found to be approximately 4.5 to 6.5 m below ground level (and may potentially be deeper beneath other parts of the site), it is considered that the industrial units to be constructed could be supported by piled foundations, extending to within the upper part of the Brithdir Member. As a possible alternative the designer may wish to consider a ground improvement technique, such as vibrated stone columns.
- Shallow groundwater should be anticipated.
- The engineering geological model was unable to calculate soil infiltration rate from soakaway testing due to low permeability ground conditions. A SuDS option is unlikely to be feasible.
- Concrete aggressivity should use DS-2 and AC-2 or DS-3 and AC-3 depending on the foundation design chosen.
- Coal Authority report notes nearby coal outcrop, dipping shallowly to the north. Although not anticipated beneath the site, there is the potential for shallow unrecorded mine working beneath the site. However, the Coal Authority report concludes that the site is 'acceptably free from coal mining related risk.
- Geoenvironmental Generic Quantitative Risk Assessment finds a low risk presented to human health and controlled waters from contaminants analysed. Moderate gas generation potential, with moderate risk. CS2 (Type D development) gas protection measures recommended. Basic protection measures required for Radon.
- Recommendations include Further gas monitoring could confirm worst case scenario encountered

Ecology & Biodiversity

- 6.41 The application site includes a small number of trees which will require removal as part of the proposal – however these are mitigated for by new tree planting as detailed in the site layout plan and Landscaping Strategy.
- 6.42 As highlighted above, a Landscaping Strategy has been prepared by Cambium in support of the scheme. The Landscaping Strategy provides a comprehensive approach towards soft landscaping provision, seeking to promote biodiversity at the application site.
- 6.43 The soft landscape proposals and landscape management and maintenance plan ensure the loss of the marshy grassland and trees required to facilitate the development is mitigated with on and off-site compensation. The soft landscape proposals incorporate native species and local 'seed bank', providing biodiversity benefit.
- 6.44 An attenuation swale is created, introducing a new wildlife habitat and water management on site in accordance with SUDs principles. The sides of the swale are to be seeded with meadow mixture of wetlands and site won topsoil from existing marshy grassland to be used for growing medium to ensure the 'seed bank' of the marshy grassland is utilised. The base of the swale is to be seeded with bespoke wildflower / grass mix. Allow for natural colonisation by desirable native species for pollinator benefit.
- 6.45 Disturbed marshy grassland during construction is to be made good and over seeded with marshy grassland mix as required. Off-site verge, within NPT ownership, is to be ecologically enhanced through management as per 4.5 above along with the planting of a native, species rich hedge. The proposed biodiversity enhancement includes the installation of bird and bat boxes
- 6.46 A Preliminary Ecological Appraisal has been prepared by Cambium in support of the scheme. The Appraisal provides the following findings and recommendations:
- To the South-East of the site is the Ynys Corrwg Farm Site of Importance for Nature Conservation (SINC), which is designated for its lowland meadow habitat. The grassland on the workshop site is highly likely a continuance of this priority habitat.
 - The marshy grassland should be retained and managed as a meadow. Any loss of this grassland will require mitigation/compensation. This could be in the form of a permanent change of management of nearby amenity grassland (off-site) into meadow, or the inclusion of Green Infrastructure such as living walls/green roofs.

- There should be no net loss of woodland.
- Any works to the existing buildings should be done outside of the nesting bird season (March – September) or be preceded by a check for nesting birds by an ecologist. The buildings have little bat potential and do not require a survey.
- Enhancement can be provided through green infrastructure such as green roofs, and bird and bat boxes on buildings.

6.47 Given the findings and recommendations as set out within the PEA, alongside the scheme of ecological enhancement measures proposed, it is envisaged the proposal will adhere to Policy SP 15 'Biodiversity & Geodiversity', EN 7 'Important Natural Features' & SP 16 'Environmental Protection'.

Trees & Green Infrastructure

6.48 The application site includes a number of trees, both within the site and at the boundary. The application site includes a small number of trees which will require removal as part of the proposal – however these are mitigated for by new tree planting as detailed in the site layout plan and Landscaping Strategy. The proposal adopts a green infrastructure-based approach towards development, with the scheme of landscaping providing a comprehensive approach towards soft landscaping and new planting. The proposed development fully embraces opportunities to integrate green features into the site design, to the benefit of the landscape setting. The proposed development will not prejudice or negatively impact the green infrastructure which borders the site.

6.49 A Tree Survey and Tree Constraints Plan has been prepared by ArbTS in support of the proposals. The findings and recommendations of the Survey and Constraints Plan are as follows:

- The Arboricultural Impact Assessment finds the site has several Arboricultural constraints that must be considered in the development design phase. A few trees have been identified as being removed to facilitate the construction of the proposed development design. All of these trees identified for removal are low-or poor poor-quality trees (C / U Category). These trees should not present a constraint on developing the site.
- Potential damage to the root protection areas can be managed through the retention of boundary fencing. This will ensure no significant long-term adverse impact will occur to any of the retained trees.
- The construction of the proposed development, whilst complying with the tree protection scheme as detailed in

section 6, will ensure that no significant long-term adverse Arboricultural impact occurs on the health of any retained trees on or adjacent to this site or the long-term amenity of the area.

- 6.50 A Green Infrastructure Statement has been prepared by Cambium in support of the proposals. The GI Statement indicates The proposed development is designed to support and improve biodiversity, to enhance and better the GI connectivity by protecting identified GI features and to respond to the landscape functions, including wildlife habitat enhancements, water management and will go some way towards improving the condition of the natural ecosystem and the aesthetic of the surrounding landscape.
- 6.51 In consideration of the Step-wise approach, the design has considered maintaining the largest possible area of existing habitat paying due regard to the potential for continued long term maintenance and management of retained areas to benefit biodiversity. The proposals ensure that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species and ensuring that the favourable conservation status of local species populations is maintained.
- 6.52 The landscape design and mitigation assist both the functional and the aesthetic aspects of the landscape but also contribute to the preservation and restoration of the natural ecosystems and a balanced coexistence between the proposed development and the environment aspects of the site.
- 6.53 To conclude, the proposals demonstrate how trees are successfully integrated within the proposed development, to the benefit of green infrastructure. The scheme therefore complies with Policy EN 7 'Important Natural Features' & SP 16 'Environmental Protection'.

7.0 Conclusion

- 7.1 This Planning Design and Access Statement has provided the policy justification in support of a full planning application to be submitted to Neath Port Talbot County Borough Council for the proposed development of 4 no. industrial workshop units (Use Class B2), highways arrangements, parking, drainage, landscaping and all associated works at Glyncorwg Workshops, Glyncorwg, Port Talbot.
- 7.2 This PDAS has sought to address the pre-application advice provided by the LPA and demonstrates how the proposal represents a policy compliant scheme. In summary, this PDAS makes the following pertinent points:
- The application site is allocated as an existing employment site under Policy EC 2, where the site is identified as part of the Glyncorwg Workshops, Afan Valley– reference EC2/13. Within these sites, uses are protected for employment related activities under Policy EC 3.
 - Whilst it is acknowledged that the proposal is situated outside of the defined settlement limits, (albeit a short distance south of the settlement limits and within an existing employment allocation) the proposal is directed towards brownfield land and is recognised as a 'small local centre' within the settlement hierarchy under Policy SP 3 'Sustainable Communities'. On this basis the proposal broadly accords with the high-level objectives of Policy SP 3.
 - A robust principle for employment uses has been established at the subject site. The proposal demonstrates thorough adherence to the relevant planning policy as set out in the adopted LDP. This includes Policies EC 2, SP 3, EC 3 & SP 6.
 - The proposed development can be considered highly sustainable, in accordance with both local and national level planning policy.
 - The design of the proposal responds to the context of the site and the surrounding area, The proposal demonstrates compliance with Policy BE 1 Design of the adopted LDP.
 - In addition to the key points addressed above, the scheme demonstrate compliance with all other material considerations including; highways & access, transport, design & parking
- 7.3 To conclude, we believe the proposals represent a policy compliant scheme when considered against the relevant local and national level

planning policies. On this basis we politely request that the application be positively determined, and planning permission be granted without delay.