

PLANNING DESIGN & ACCESS STATEMENT

Nant Y Cafn Business Park
Seven Sisters
Neath
SA10 9ES

July 2024



Summary

Proposal:

Development of 6 no. industrial workshop units (Use Class B2), highways arrangements, parking, drainage, landscaping and all associated works.

Location:

Nant Y Cafn Business Park, Seven Sisters, Neath, SA10 9ES

Date:

May 2024

Project Reference:

S24.128

Client:

Neath Port Talbot County Borough Council

Product of:

Asbri Planning Limited
Suite D 1st Floor
220 High Street
Swansea
SA1 1NW

Prepared by:

Oliver Hanney

Approved by:

Phil Baxter

Disclaimer:

This report has been prepared for the sole and exclusive use of client whom it was commissioned and has been prepared in response to their particular requirements and brief. This report may not be relied upon by any other party.

The Contracts (Rights of Third Parties) Act 1999 shall not apply to this report and the provisions of the said Act are expressly excluded from this report. This report may not be used for any purpose other than that for which it was commissioned. This report may not be reproduced and/or made public by print, photocopy, microfilm or any other means without the prior written permission of Asbri Planning Ltd. The conclusions resulting from this study and contained in this report are not necessarily indicative of future conditions or operating practices at or adjacent to the Site. Much of the information presented in this report is based on information provided by others. That information has neither been checked nor verified by Asbri Planning Ltd.

Contents

Section 1

Introduction

Section 2

Site Description

Section 3

Planning History

Section 4

The Proposed Development

Section 5

Planning Policy Context

Section 6

Key Planning Considerations

Section 7

Conclusion

1.0 Introduction

- 1.1 This Planning, Design & Access Statement 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 6 no. industrial workshop units (Use Class B2), highways arrangements, parking, drainage, landscaping and all associated works at Nant Y Cafn Business Park, Seven Sisters, Neath, SA10 9ES.
- 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
Site Sections	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
Drainage Layout	Bingham Hall
External Layout	Bingham Hall
Vehicle Tracking	Bingham Hall
External Finishes	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
External Layout	Bingham Hall
Drainage Strategy Report	Bingham Hall
Biodiversity Report	NPT Wildlife
Soft Landscaping Proposals	Cambium
Landscape Management & Maintenance Plan	Cambium
Green Infrastructure Statement	Cambium
Plant Noise Assessment	Red Twin
Acoustic Design Review	Red Twin
Desk Study & Field Reconnaissance	SOCOTEC
Site Investigation Report	SOCOTEC
Topographical Survey	Landmark Surveys Wales
Transport Technical Note	Asbri Transport
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 settlement of Nant-Y-Cafn, situated a short distance south of Seven Sisters (750 metres) and approximately 11.5 km north east of Neath. The application site is situated in the Nant-Y-Cafn Business Park and currently comprises scrubland and vegetation, with an access track running through the southern section of the site, leading from the existing site access spur.
- 2.2 The application site is accessed at the site's western boundary, via Nant Y Cafn Business Park. An access track currently bisects the southern section of the site, leading to the adjoining agricultural site to the east, The site benefits from good links to the surrounding highways network, with Nant Y Cafn Business Park linking to the A4109, which provides access to Seven Sisters. The subject is served by a dedicated car parking area, which surrounds the larger of the two industrial units.



Image 1: Site view from access point

- 2.3 In respect of surroundings, the unit is set in an area of mixed uses, including employment, healthcare & residential. A GP surgery and pharmacy immediately adjoin the site to the south, whilst residential dwellinghouses are found to the west. Agricultural land adjoins the site to the north and east. In terms of notable features, the River Dulais is found approximately 175 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 both in Nant-Y-Cafn and the nearby settlement of Seven Sisters. This includes a convenience store, public house, health centre, pharmacy, public open space and a primary school. The nearest bus stop is located approximately 35 metres south of the site at Dulais Valley GP Surgery, providing access to the X8 Cymru Clipper route, which offers frequent services to Neath and the surrounding area.

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 6 no. workshops (Use Class B2), alongside highways arrangements, parking, drainage, landscaping and all associated works at Nant Y Cafn Business Park, Seven Sisters, Neath, SA10 9ES.
- 4.2 The proposal will see the construction of an industrial unit, comprising 6 no. workshops, in the north of the subject site. The existing site access spur will be utilised, leading to a dedicated car park to serve the proposals. An area for SuDS is provided in the far east of the site, alongside new tree planting. Boundary planting is incorporated within the site to soften the edges of the development, adding greenery and visual interest.

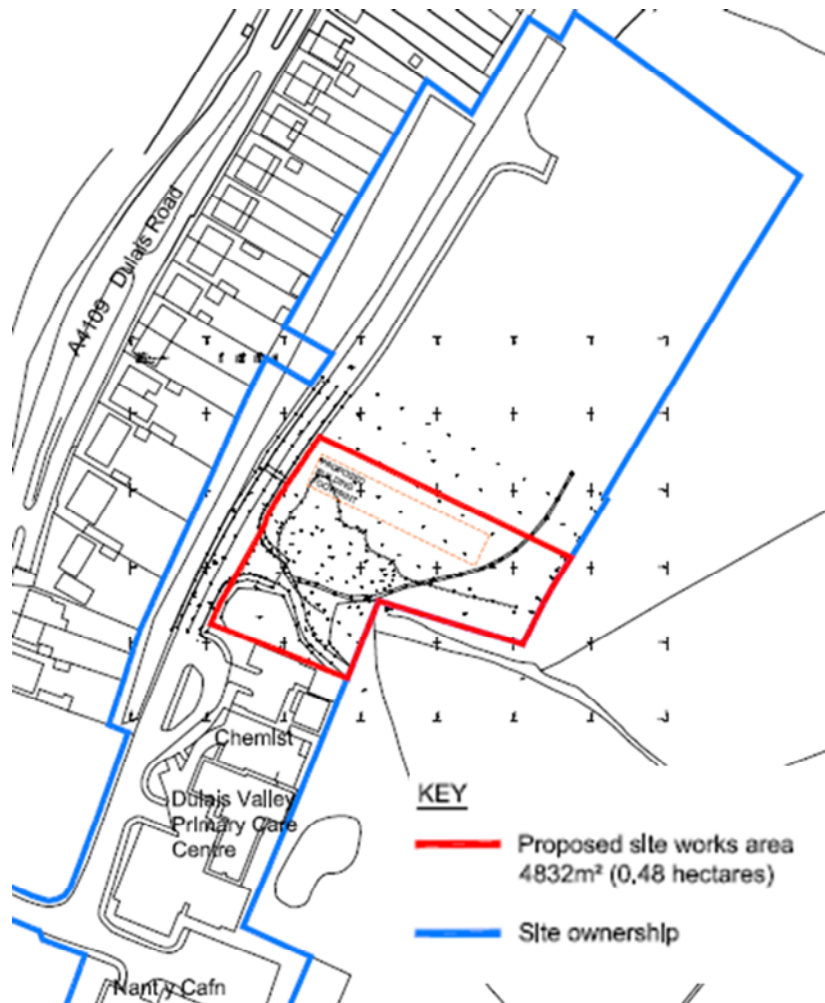


Image 3: Site Location Plan

- 4.3 The development is served by 18 no. car parking spaces, provided adjacent to the proposed frontage/south facing elevation. This includes 2 no. accessible car parking spaces together with EV spaces.
- 4.4 The proposed workshops are functional in design and modest in appearance. The unit is a single storey in height with external walls of brickwork and cladding. The unit frontage will benefit from 6 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.

5.0 Planning Policy Context

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that: "If regard is to be had to the Development Plan for any purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the Plan unless material considerations indicate otherwise".
- 5.2 The development plan that encompasses the application site is the Neath Port Talbot Local Development Plan 2011 – 2026, adopted January 2016. Material considerations at a local level also include the relevant Supplementary Planning Guidance. Material considerations at a national level include Planning Policy Wales Edition 12 (February 2024), and the appropriate Technical Advice Notes (TANs).



Image 4: NPT LDP Cover page

- 5.3 Section 38(4) of the PCPA 2004 (as amended) states that: "For the purposes of any area in Wales the development plan is: (a) the National Development Framework for Wales, (b) the strategic development plan for any strategic planning area that includes all or part of that area, and (c) the local development plan for that area". Accordingly, the policies of relevance contained within the National Development Framework Future Wales: The National Plan 2040 and the adopted LDP are now discussed.

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

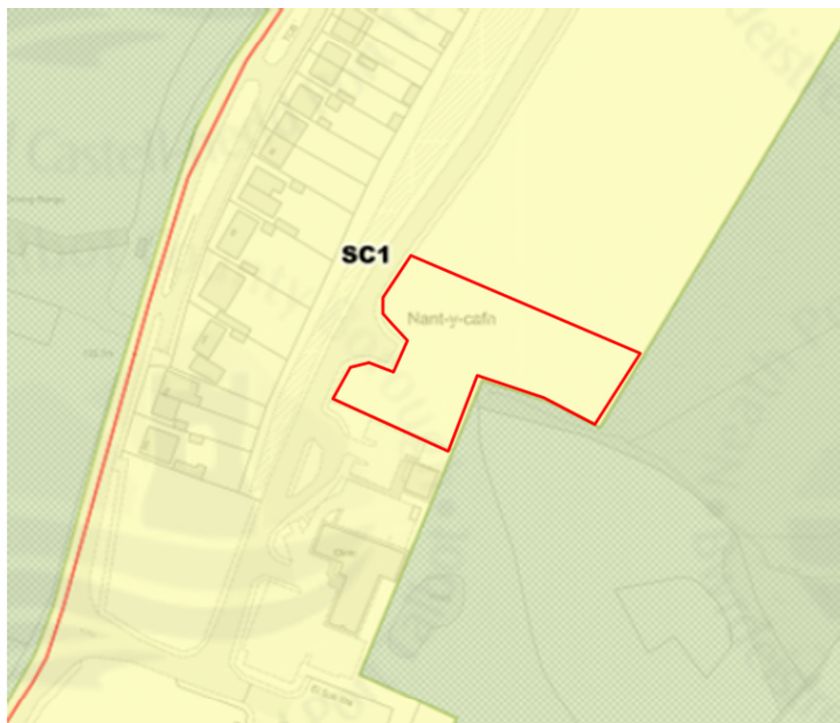


Image 5: NPT LDP Proposals Map Extract

- 5.6 The LDP Proposals Map indicates the subject site is located within the settlement boundary as defined by 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."*
- 5.7 Within the settlement hierarchy for Neath Port Talbot under **Policy SP 3 'Sustainable Communities'** Nant-Y-Cafn / Seven Sisters 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”.

5.8 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.”*

5.9 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 Glyncorrwg 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.”

5.10 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.

5.11 **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.”

- 5.12 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"*

- 5.13 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.

- 5.14 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

- 5.15 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

- 5.16 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”.
- 5.17 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”.
- 5.18 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

- 5.19 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
- Ecology & Biodiversity
- Trees & Green Infrastructure

Principle of Development

6.2 As highlighted in the preceding Policy Context section, the application site is located within the Settlement Limit as defined by Policy SC 1, which indicates that development that is proportionate in scale and form to the role and function of the settlement will be acceptable in principle. Furthermore, in respect of settlement limits the supporting text states at para. 3.0.13:

“They allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the strategy.”

6.3 The application site is not allocated for a specific use within the adopted LDP and therefore represents ‘white land’ within the settlement boundary, where a range of development should be considered acceptable in principle subject to compliance with the other policies of the Plan. The supporting text confirms this position at para 3.0.14, stating:

“Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy and subject to it being proportionate in scale and form to the role and function of the settlement”.

- 6.4 The proposal is directed towards an established settlement. Seven Sisters 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 adheres to Policy SP 3. It is therefore considered the modest quantum of employment floorspace is appropriate and corresponds with the scale and form of the settlement.
- 6.5 Policy SP 11 'Employment Growth' indicates new and expanding employment developments will be encouraged. The Policy indicates employment uses will be encouraged in principle within settlement limits. Additionally, within the Valley Strategy area a flexible approach will be taken to employment proposals within settlement limits.
- 6.6 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.
- 6.7 In addition to the above, the pre-application advice provided by the LPA indicates the subject site was previously allocated under Policy EC1/10 of the former UDP for employment/industrial uses. Whilst it is acknowledged this policy context is no longer relevant, the advice confirms there are existing employment generating uses in the vicinity of the site which suggests the provision of new industrial units may be acceptable in principle. The advice highlights how consideration should be given to the impact on adjoining land uses, in respect of noise and visually in respect of the adjoining special landscape area.
- 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 SC 1, SP 3, SP 6 & SP 11.

Sustainability

- 6.9 The application site occupies a highly sustainable location within the defined settlement boundary, in close proximity to services, facilities, community assets and public transport nodes in Seven Sisters. As highlighted above, the nearest bus stop is outside of the health centre which immediately adjoins the site to the south, providing access to the X8 Cymru Clipper service, which calls twice an hour in daytime hours on weekdays. The site benefits from good connections to surrounding infrastructure and active travel facilities. The existing access spur benefits from pedestrian pavements on both sides of the carriageway. Nant-Y-Cafn Business Park also has pavements on one side of the carriageway, enabling safe pedestrian movement to Dulais Road.
- 6.10 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. Seven Sisters 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

- 6.11 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”*.
- 6.12 The proposal will provide new, modern employment floorspace, creating 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

- 6.13 The proposed workshops are functional in design and modest in appearance, corresponding with the position of the site at the edge of the settlement and bordering a Special Landscape Area. The unit is a single storey in height with external walls of brickwork and cladding. The unit frontage will benefit from 6 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.

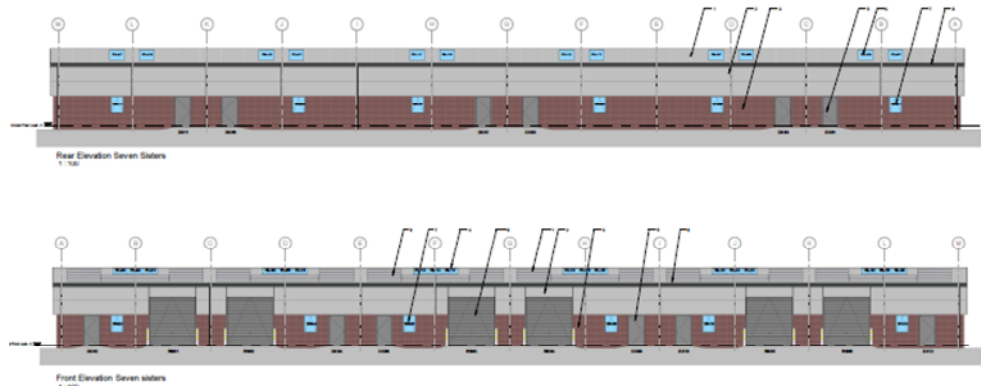


Image 6: Front & rear elevations

- 6.14 The design of the proposal responds to the context of the site and the surrounding area. The visual appearance of the workshops has been formulated to be of an appropriate scale which will ensure the proposal is not overly prominent in the landscape. It is considered the height and massing of the proposal is suitable for the character of the area.



Image 7: Side elevations

- 6.15 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. To summarise, the proposal demonstrates compliance with Policy BE 1 'Design' of the adopted LDP.

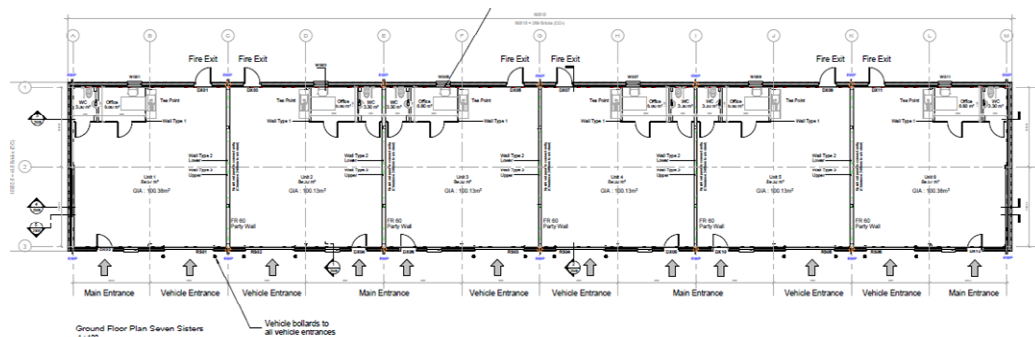


Image 8: Proposed floorplans

Residential Amenity & Noise

- 6.16 The siting of the proposed workshops is approximately 55 metres west of the rear elevations of the nearest residential properties situated on Dulais Road. The rear gardens of the dwellings are situated approximately 25 metres west of the proposed workshops.
- 6.17 A Plant Noise Assessment has been prepared by Red Twin in support of the proposed development. The Assessment makes the following recommendations and conclusions:
- We have undertaken an assessment of the proposed new fixed building plant against the methodology set out in BS4142:2014 and to assess compliance with the relevant guidance, i.e. local planning policy and national policy.
 - Prior to the detailed design and equipment selection we have assessed the situation in reverse and set a maximum sound level for the proposed equipment which can be expected to achieve the Local Authority requirements at the nearest neighbours
 - It is thought that the proposed plant will be similar in context to the neighbouring units and the proposed location is not sensitive to the inclusion of new building services plant.
 - 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.
 - We are of the opinion that the new sources would not be noticeable as out of character with the ambient sounds in this area and no adjustment to the targets in the standard are necessary.
 - It is likely that the proposed mechanical plant will be of a low impact during the day and night period.
- 6.18 Additionally, an Acoustic Design Review has been prepared by Red Twin, which indicates that the target internal noise levels will 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. The design of the building can be demonstrated to achieve the acoustic performance requirements subject to the design recommendations stated.

- 6.19 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. Through the implementation of the above recommendations, it is envisaged the proposed development will not significantly impact the residential amenity of nearby residential dwellinghouses.

Highways, Access & Parking

- 6.20 Vehicular and pedestrian access will be achieved utilising the existing access/egress spur that leads into the site from Nant-Y-Cafn Business Park. The proposed development provides a generous area for internal vehicular movements within the site. It is anticipated that vehicles accessing the site will be able to enter, manoeuvre to turn and leave the site in a forward gear. The proposed access point benefits from good visibility in both directions along Nant-Y-Cafn Business Park.
- 6.21 It should be noted a public car park is situated immediately south of the application site, which serves the nearby health centre.



Image 9: View of Nant-Y-Cafn looking south from opposite the site access spur

6.22 A Transport Statement has been prepared by Asbri Transport in support of the proposals. The Statement makes the following findings and recommendations:

- It can be observed from this data that there are no recorded personal injury collisions in close proximity to the proposed development site. The four slight collisions observed are spread along the A4109 to the north and south of Seven Sisters with two occurring in the centre of the village.
- A review of this data shows that there is not an accident or road safety issue on this section of the A4109 which would be exacerbated by the implementation of the proposed development.
- Vehicular access to the development site would be via the existing priority junction on the Nant Y Cafn Business Park access road immediately to the north of the Primary Care Centre and the Pharmacy. The existing junctions have visibility splays that comply with current technical standards as detailed in Manual for Streets.
- Pedestrian access will be via the existing footways either side of the access road.
- The proposal provides 18 car parking spaces, including 2 no. disabled spaces, which is considered sufficient.
- The proposed development would likely generate an up to 10 and 8 two-way vehicular movements during the AM and PM peak hours respectively. Daily, the site could generate up to 43 two-way vehicle movements. In respect of trip generation, it can be considered that this likely level of movement will have a marginal impact on the highway network.



Image 10: View of Nant-Y-Cafn looking north, opposite site access spur

- 6.23 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

- 6.24 As previously noted, the site is located within the Coal Mining Reporting Area but is outside of the High-Risk Development Area. It is envisaged the planning application will not require a supporting Coal Mining Risk Assessment.

Flood Risk

- 6.25 The NRW TAN15 online Development Advice Map extract below indicates the application site is situated within Flood Zone A – Considered to be at little or no risk of fluvial or coastal/tidal flooding.

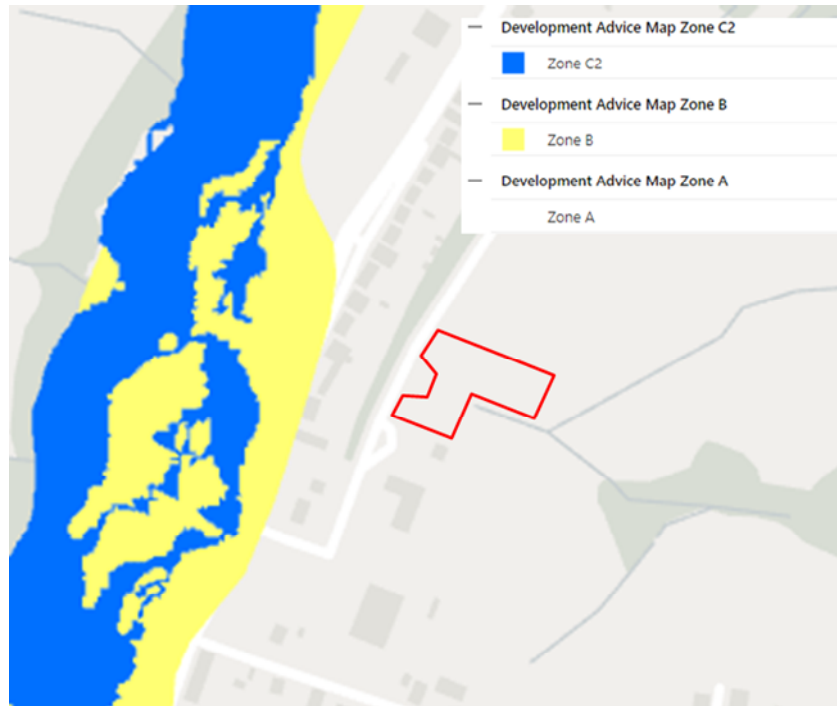


Image 11: NRW TAN 15 online mapping extract

- 6.26 The forthcoming Flood Map for Planning mapping extract below indicates the site is unconstrained by flood risk from rivers and sea. An area of surface water and small watercourses flooding is located within the site. It is envisaged the Drainage Strategy and scheme of SuDS measures will address surface water flooding constraints. These details are discussed further below.

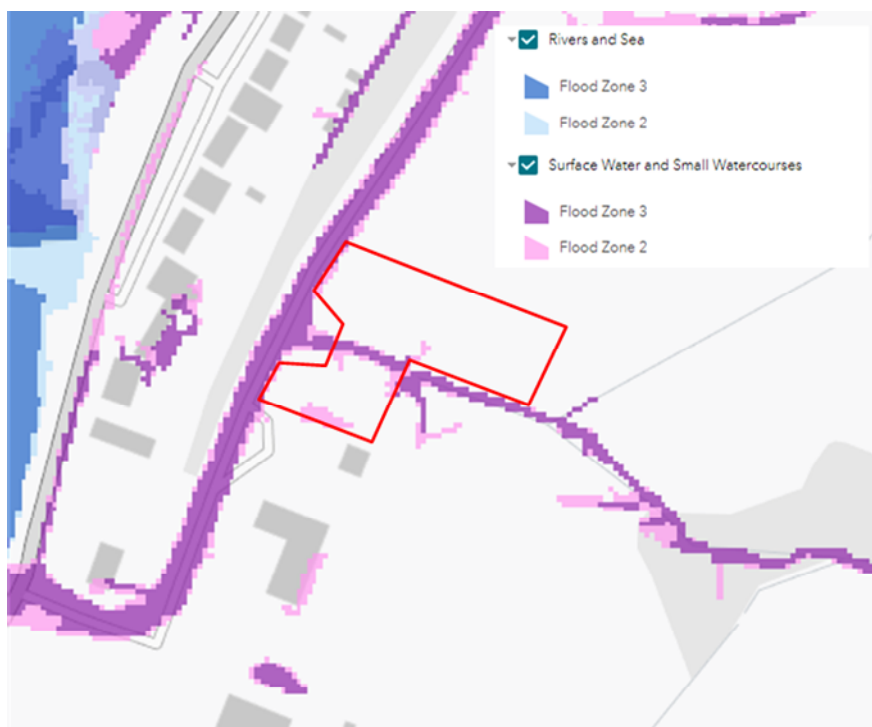


Image 12: Flood Map for Planning extract

- 6.27 In summary, it has been demonstrated how the application site is unconstrained by flood risk and the development of the site will not be prejudiced by flood risk considerations.

Drainage

- 6.28 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.
- 6.29 All new developments of more than 1 dwelling house or where construction is 100m² of 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.
- 6.30 A Drainage Strategy Plan has been prepared by Bingham Hall 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 east of the workshops, designed to store and convey surface water runoff.

Ecology & Biodiversity

- 6.31 The application site includes a number of trees and vegetation 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. Mitigation will be provided in the form of...
- 6.32 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.
- 6.33 A Preliminary Ecological Appraisal has been prepared by NPT Wildlife in support of the scheme. The Appraisal provides the following findings and recommendations:
- Part of the site is designated as a Site of Importance for Nature Conservation (SINC). It is designated for lowland dry acid grassland, lowland heathland, purple moor-grass and rush pasture. It is also part of wider Marsh fritillary habitat.
 - Any works to vegetation should be done outside of the nesting bird season (March – September) or be preceded by a check for nesting birds by an ecologist.
 - Enhancement can be provided through green infrastructure such as green roofs, and bird and bat boxes on buildings.
 - Although the site area contains mainly scrub, which has its own merits, it is degraded as far as the SINC designation is concerned. Any development in this area will require some form of mitigation for the loss of bird nesting habitat plus some form of enhancement. There should be no loss of the marshy grassland, which occupies the northern site boundary, as it is a priority habitat as identified in the Section 7 list of the Environment Act (Wales) 2016.
- 6.34 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

- 6.35 The application site includes a number of trees, both within the site and at the boundary. The application site includes a 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.

6.36 A Green Infrastructure Statement has been prepared by Cambium in support of the proposals, and provides the following recommendations and findings:

- 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.
- In consideration of the Step-wise approach, the design has considered maintaining the largest possible area for Marshy Grassland habitat creation.
- The proposals ensure that retained habitats adjacent to the site 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.
- 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.

6.37 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:

- In respect of overall tree loss, 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 quality trees (C Category). These trees should not present a constraint on developing the site.
- Root protection area potential damage can all be managed through the installation of tree protective fencing, installation of a Cellweb product and arboricultural supervision when excavating within the RPA etc., as designed by an Arboriculturist will ensure no significant long-term adverse impact will occur to any of the retained trees.

- Some branch reduction/branch lifting pruning work will be required to facilitate this proposed scheme, as detailed in the tree protection plan (Appendix 4). This work will be carried out to the British Standard 3998:2010 tree work recommendations. Adhering to this standard will ensure no adverse impact on these trees' long-term health or visual amenity.
- Overall, the design has considered the size and value of the trees on this site to minimise any future pressures to heavily prune or fell the higher-value trees.
- In summary, the construction of the proposed development, whilst complying with the tree protection scheme 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.



Image 13: View of application site

6.38 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 6 no. industrial workshop units (Use Class B2), high-ways arrangements, parking, drainage, landscaping and all associated works at Nant Y Cafn Business Park, Seven Sisters, Neath, SA10 9ES.
- 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 located within the Settlement Limit as defined by Policy SC 1. The application site is not allocated for a specific use within the adopted LDP and therefore represents 'white land' within the settlement boundary, where a range of development should be considered acceptable in principle subject to compliance with the other policies of the Plan.
 - The proposal is directed towards an established settlement. Seven Sisters 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
 - 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.
 - Policy SP 11 'Employment Growth' indicates new and expanding employment developments will be encouraged. The Policy indicates employment uses will be encouraged in principle within settlement limits. Additionally, within the Valley Strategy area a flexible approach will be taken to employment proposals within settlement limits.
 - 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 SC 1, SP 3, SP 6 & SP 11.
 - 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.