

DESIGN & ACCESS STATEMENT

Neath Port Talbot Dialysis Unit

September 2024



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Description of development:

Proposed redevelopment of Stationery House, including the part demolition of existing factory building and rebuilding work, change of use from vacant factory (Use Class B1 & B8) to form a Satellite Dialysis Unit (Use Class D1), including alterations to the existing building, with associated car parking, landscaping, refuse storage and engineering works.

Location:

Stationery House, Acacia Avenue, Sandfields, Port Talbot, SA12 7DN

Date:

September 2024

Asbri Project ref:

S24.144

Client:

Fresenius Medical Care UK Renal Services Ltd.



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Date	Sept. 2024	Sept. 2024
Revision	-	-

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INTRODUCTION

1.1 The purpose of a Design & Access Statement (DAS) is to provide a clear and logical document to demonstrate and explain the various facets of design and access in relation to the site and to appraise the proposed development against relevant planning policies. It also presents the details of a planning application in a way that can be read both by professionals and the public.

1.2 The diagram (right), extracted from Chapter 3 of Planning Policy Wales 12, summarises the five objectives of good design that should be taken into account when preparing a DAS. 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.

1.3 The submitted Design and Access Statement adheres to guidance embodied in the Welsh Government publication, Design and Access Statements in Wales, published in June 2017.

1.4 The statement is subdivided into nine sections, commencing with a brief overview of the site context and analysis in Section 2. Section 3 interprets and applies the context of the brief and vision for the site, whilst Section 4 summarises the relevant planning policy. Section 5 sets out the proposal, explores the relevant design and access facets associated with the application and provides a response to planning policy. The document then concludes, under Section 7.

1.5 This DAS has been prepared on behalf of Fresenius Medical Care UK Renal Services Ltd (FMC) to accompany a planning application for the proposed redevelopment of Stationery House, including the part demolition of existing factory building and rebuilding work, change of use from vacant factory (Use Class B1 & B8) to form a Satellite Dialysis Unit

(Use Class D1), including alterations to the existing building, with associated car parking, landscaping, refuse storage and engineering works at Stationery House, Acacia Avenue, Sandfields, Port Talbot, SA12 7DN.

1.6 The following information has been submitted in support of the application:



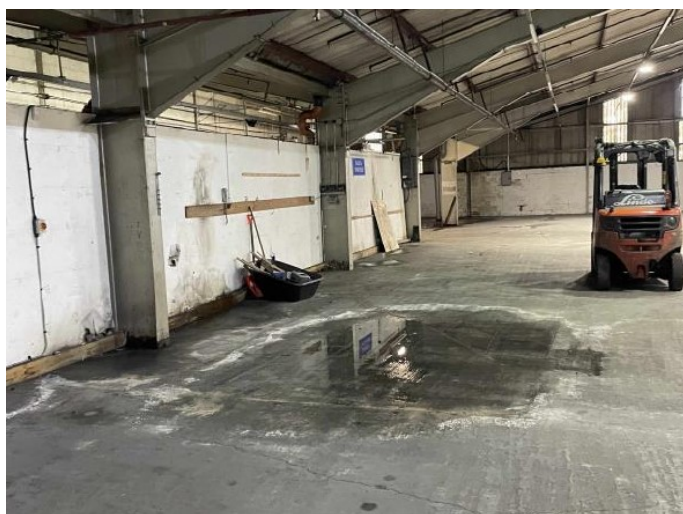
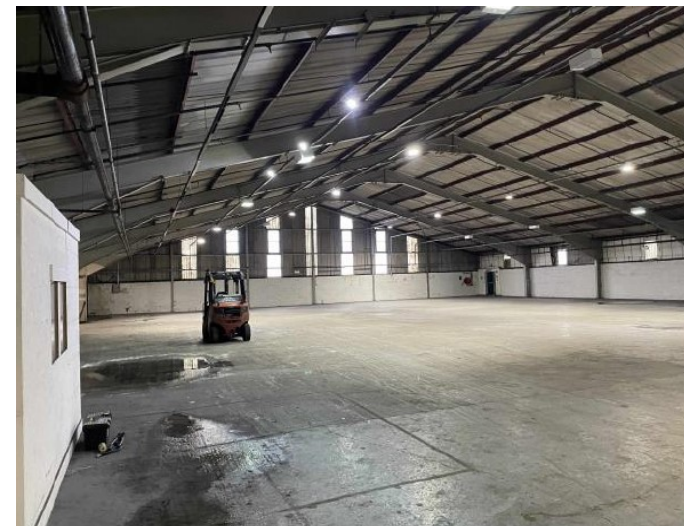
Drawing Name	Prepared By
Site Location Plan and Block Plan	CTD Architects
Site Layout Plan 'as existing'	CTD Architects
Site Layout Plan 'as proposed'	CTD Architects
Building Layout 'as existing'	CTD Architects
Building Roof Plan 'as existing'	CTD Architects
Building Elevations 'as existing'	CTD Architects
Building Layout 'as proposed'	CTD Architects
Building Roof Plan 'as proposed'	CTD Architects
Building Elevations 'as proposed'	CTD Architects
Building Section 'as existing & proposed'	CTD Architects
Bin Store and AC Enclosure Details	CTD Architects
Cycle Store Details	CTD Architects
Entrance Gate Details	CTD Architects
Site Section 'as proposed'	CTD Architects
General Arrangement Plan 'as proposed'	CTD Architects
Indicative Demolition Areas Plan	CTD Architects
Visualisations	CTD Architects

Document Name	Prepared By
Application Forms	Asbri Planning
Design & Access Statement	Asbri Planning
Construction Environmental Management Plan	Sandycroft
Construction Method Statement	Sandycroft
Drainage Strategy	Waterco
Interim Ecological Statement	Hawkeswood Ecology
Energy Statement	Viro
Engineering Appraisal	C2C
Green Infrastructure Statement	DP Landscape Architecture
Soft Landscape Proposals	DP Landscape Architecture
Noise Impact Assessment	Acoustic Consultants
Radon Report	Rhondda Geotech Services
Topographical Survey	Redbox Surveys
Transport Statement	Asbri Transport
Tree Report	ArbTS
Site Investigation	Rhondda Geotech

SITE IMAGES



INTERNAL IMAGES



SITE IN LOCAL CONTEXT



SITE CONTEXT AND ANALYSIS

The Site and Surroundings

2.1 The site comprises a detached factory unit with ancillary office space, a mix of single storey buildings filling the majority of the site with limited access and parking to the front. The existing factory unit is now vacant, and was previously occupied by Blackwood Wire Products Ltd.

2.2 The site fronts Acacia Avenue and is broadly rectangular in shape with an area of 0.3869 hectares. The site is centred on the following grid coordinates E: 274729, N: 190720.

2.3 Afan Way (A4241) adjoins the rear boundary of the site whilst Vitality Health and Fitness' car park adjoins its western boundary. Acacia Avenue adjoins the site's southern boundary, and residential properties adjoin the eastern boundary of the site.

2.4 In terms of the surrounding context, the site is located approximately 60m to the southwest of Baglan Bay Retail Park, which houses PureGym, Screwfix, an Iceland Food Warehouse, and Howdens. The area to the south of the site is largely residential in nature, where dwellings are typically 2-storey in nature.

2.5 A review of Cadw mapping identifies there are no listed buildings or scheduled monuments within or adjoining the site boundary. The nearest listed building is the Grade II listed war memorial (Ref: 22853) located within Vivian Memorial Park, some 900m to the southeast of the site.

2.6 In terms of flooding, NRW's Development Advice Map reveals that the site lies within Flood Zone A, where there is considered to be little or no risk of fluvial or coastal/tidal flooding.

2.7 In terms of surface water and small watercourse flooding, NRW's Flood Map for Planning indicates that the site resides

within Flood Zone 2. This indicates that there is a 0.1% to 1% (1 in 1000 to 1 in 100) chance of flooding from surface water and/or small watercourses in a given year, including the effects of climate change.

2.8 The Coal Authority's online interactive map confirms that the site lies outside any known mining areas. The coal authority is not aware of any evidence of damage arising due to faults affected by coal mining.

2.9 A review of the Neath Port Talbot LDP Proposals Map indicates the subject site is situated within the defined settlement boundary. The application site is not subject to a site-specific designation or allocation and therefore represents 'white land', where a range of development should be acceptable in principle.

Access

2.10 The application site benefits from excellent connections to the surrounding infrastructure and transport networks. Acacia Avenue benefits from pavements on either side of the carriageway, enabling safe access on foot. Similarly, active travel such as cycling is an attractive option given the site's sustainable location and proximity to active travel routes which link to services and facilities in the vicinity.

2.11 The A4241 / Afan Way is an existing walking and cycling active travel route as defined by the Neath Port Talbot Active Travel Network Map (route NPT-PT-SU0010) and is also on the National Cycle Network Route 4, a long distance route between London and Fishguard.

2.12 The site is well served by the existing highway network; the A4241 is an arterial route through Port Talbot, linking Junction 41 of the M4 motorway with Baglan Moor, Sandfields and Aberavon.

2.13 The nearest bus stop is Vivian Park Drive, c. 80 metres south, providing access to the 82 service which runs on an hourly basis during weekday daytime to Port Talbot bus station.

2.14 The nearest train station is Port Talbot, situated

approximately 2.3 km south-east of the site, in the town centre. Frequent services are available to Swansea, Neath, Bridgend, Cardiff and London.

Planning History

2.15 Asbri Planning have undertaken a review of the Neath Port Talbot Council online planning register, which identified the following historical planning application associated with the subject site:

- P1990/7498 - Change of use of manufacturing to 40 manufacturing and 60% warehousing: Approved 11/03/1990
- P1974/0084 - Advert Sign: Approved 09/07/1974

PRE-APPLICATION ADVICE

Pre-Application Submission and Feedback

2.16 Pre-application advice was provided by Neath Port Talbot County Borough Council on 8th April 2024. A summary of the pre-application advice is provided below.

- The application building appears to be very dated and in need of significant refurbishment.
- The development site is located off the main roads and public transport routes and is not considered to be a particularly sustainable location. Any application submitted would have to address the sustainability issues associated with such a location
- It would also need to justify such a location of a service building that would be visited by a large number of people throughout the day and potentially late into the evenings if the building were to be eventually use as indicated in the supporting document until 23:00hrs.
- It is therefore strongly suggested that consideration is given to a location within one of the Authority's town centre locations such as Neath or Port Talbot, both of which are served by well established bus and train routes, with interchange facilities. Such a location would also be considered to accord with the Welsh Government Principles of Town Centre first.
- It is noted that the proposed replacement building would be a marked improvement over the appearance of the existing building and would position the building within the boundaries of the site, rather than the existing development which currently fills the site to its rear and two side boundaries. The proposed replacement structure would therefore appear to be of a more comfortable scale of development within the site. It is also noted that the proposal would include landscaping and potential improvements in the appearance of the front boundary treatment.
- The proposed development would also result in a change in use of the existing building away from a commercial use and towards a non-residential institutional use (D1). This would be a change in the character of the existing land use within this location. The supporting statements suggests that the proposed development would create a more active frontage with more comings and goings throughout a longer working day (potentially to 23:00hrs). The adverse impacts associat-

ed with such an increase in activity at the site for a much longer period would have to be carefully weighed against the visual improvements in the amenity of the area that would result from the proposed development.

- It is noted that the proposal would result in a much-reduced replacement building, which would be located further back from the front and side boundaries with the existing residential properties. It is also considered likely that the modern cladding materials proposed for the walls and roof would have a higher grade of energy and noise insulation than the existing building, thereby providing a potential reduced impact upon the residential amenity of the occupiers of the adjacent dwellings.
- It is noted that the proposed elevation drawings show that there would be a number of windows located along both sides and rear elevations of the proposed building. While there would be no objection to the windows shown in the rear (north eastern) and north western side elevations, the windows within the south eastern elevation would look directly into the rear garden area of number 160 Lingfield Avenue. Even when considered with the set in off this boundary of the new building, the number and size of these windows would even if obscure glazed give the perception of overlooking.
- Particularly towards the rear of the building where it appears to be building up from the sloping down ground level, which would means that any proposed fencing would be less effective at screening any outlook from these windows. It is however, noted that a number of the internal dividing walls for the treatment areas are shown to terminate against these windows rather than walls. As such, it is assumed that this aspect of the building's design and layout is still under consideration and may well result in the reduction in the number and size of windows along this boundary to a less obtrusive extent, which when obscure glazed, together with appropriate boundary treatment (the effective height of which would have to be demonstrated by sections through the proposed building and proposed side boundary treatment) may help to mitigate the impacts down to a more acceptable level.

- While it is noted that submitted layout plan shows the tracked movement of a commercial vehicle just within the entrance to the site, the turning facilities are not located adjacent to the delivery area, which together with the parking spaces opposite does not appear to be sufficient room to turn a delivery vehicle once it has pulled into the delivery/servicing bay. Similarly, a vehicle trying to leave parking space 23 or the inner most ambulance bay would be unable to leave if a vehicle is using the delivery bay or drop-off area.
- It is also noted that the proposed layout plan indicates that the pedestrian access and vehicle access points would be retained, with replacement gates and railings. It is suggested that any replacement fencing and gates should be of a weld mesh variety over the existing palisade fencing as this would result in a less obtrusive visual impact and improved site security. It is however noted that the footway dropped kerbs looks a little irregular and should be replaced and that consideration should be given to the use of tactile pavement within the vehicle and pedestrian junctions.
- The application site is located off the main roads and away from the main public transport routes and as such is not considered to be a particularly sustainable located for a facility that would require the visit of a large number of visitors each day. It is suggested that consideration be given to a more sustainable located in close proximity to existing train and bus routes, thereby reducing the current dependence upon the use of private motor vehicles by both staff and visitors.

VISION & BRIEF

Background

4.1 People with chronic renal failure may require haemodialysis as an outpatient up to 3 times a week. Haemodialysis is a treatment which is essential to the maintenance of life, and requires up to 4 hours for each patient visit. Kidney dialysis services across the area have been developing over the past few years in response to inevitable pressures facing the service.

4.2 These pressures include an increasingly older and growing kidney patient population with more co-morbidities, such as diabetes and coronary heart disease, and the need to enhance the choices available to renal patients in the care they receive. Delivery of services close to the patient home which will provide equity of access and consistency in quality are key drivers for kidney services in this demographic.

4.3 Swansea Bay University Health Board (SBUHB) provides long term dialysis for patients across a network of sites in the east and west Swansea region emanating from the Morriston Hospital Main Unit, including satellite dialysis units in Carmarthen, Haverfordwest and Aberystwyth.

4.4 SBUHB are seeking to enhance renal capacity in the area with the introduction of a further two new dialysis units in Neath Port Talbot and Bridgend respectively.

4.5 There is demonstrable need for the Neath Port Talbot facility to be conveniently located within a close proximity of the Neath Port Talbot Hospital Site to best serve Neath Port Talbot's patients. The renal dialysis unit will initially provide capacity up to 27no. stations catering to 108 patients and 16,848 treatments per annum.

Vision

4.6 The aim is to create a high quality healthcare facility which will sit comfortably within the surrounding area, enhancing the existing building and site with modern materials, design, functionality and sustainability.

Brief

4.7 The Applicant embarked on extensive site searches for commercial property and new-build sites within the local area. The following criteria was key for the chosen Site:

- The location is within 30 minutes travel time for the majority of existing patients;
- The proposed internal space of the unit and associated site area would be able to facilitate the required space for the current patient numbers including expected future expansion and parking provision all at ground floor level.
- Public transport availability.
- Vacant premises, immediately available for conversion to meet critical timescales. The new satellite dialysis unit will meet the needs of Neath Port Talbot dialysis patients off-site from the Morriston Hospital, reducing burdensome journey times for patients, whilst delivering a high standard of care as defined by the Welsh Renal Clinic Network Service Specification, and national and international best practice guidelines.
- The unit will provide additional facilities to enable dedicated training for home haemodialysis for all patients who wish to have their treatments in their own home and to provide an area for shared self care.



Typical Unit Reception

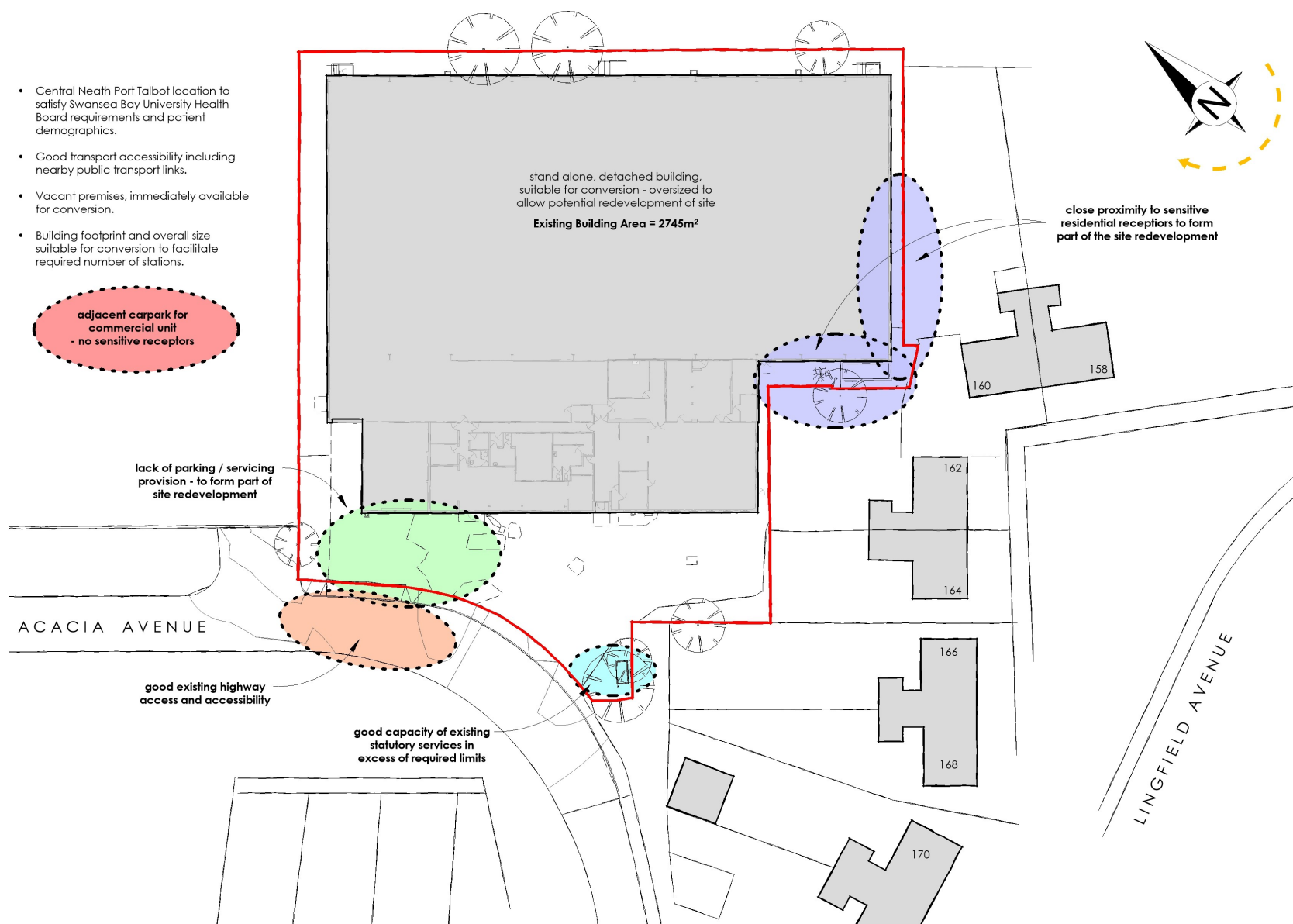


Typical Unit Treatment Area

PROPOSED CONTEXT VIEWS



OPPORTUNITIES AND CONSTRAINTS MAP



INTERPRETATION

Design Concept

3.1 The concept for the development of the site has derived from the following:

- Full site analysis including a full desktop study of the site and its surroundings
- A site visit and general visual assessment of the surrounding area.
- Discussions with the client and a full understanding of the brief and vision of the project, and

3.2 The above steps have presented the key opportunities and constraints for the site, which are outlined below:

Opportunities

Settlement Boundary - the site is wholly within the settlement boundary of Port Talbot where development is considered acceptable.

Brownfield Land - previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.

Sustainable Location - the site is considered to be located within a sustainable location and is well connected to a number of shops, services and facilities.

Site Topography - the topography of the site is generally level.

Low Flood Risk - NRW's Flood Map for Planning shows that the site does not lie within a flood zone.

Public Transport - public transport surrounds the site, with a bus stop within close proximity connecting the area to Neath, Port Talbot and Swansea.

Availability - vacant premises, immediately available for conversion.

Suitability - stand alone, detached building, suitable for conversion - oversized to allow potential redevelopment of site.

Services - good capacity of existing statutory services in excess of required limits.

Access - good existing highway access point and accessibility.

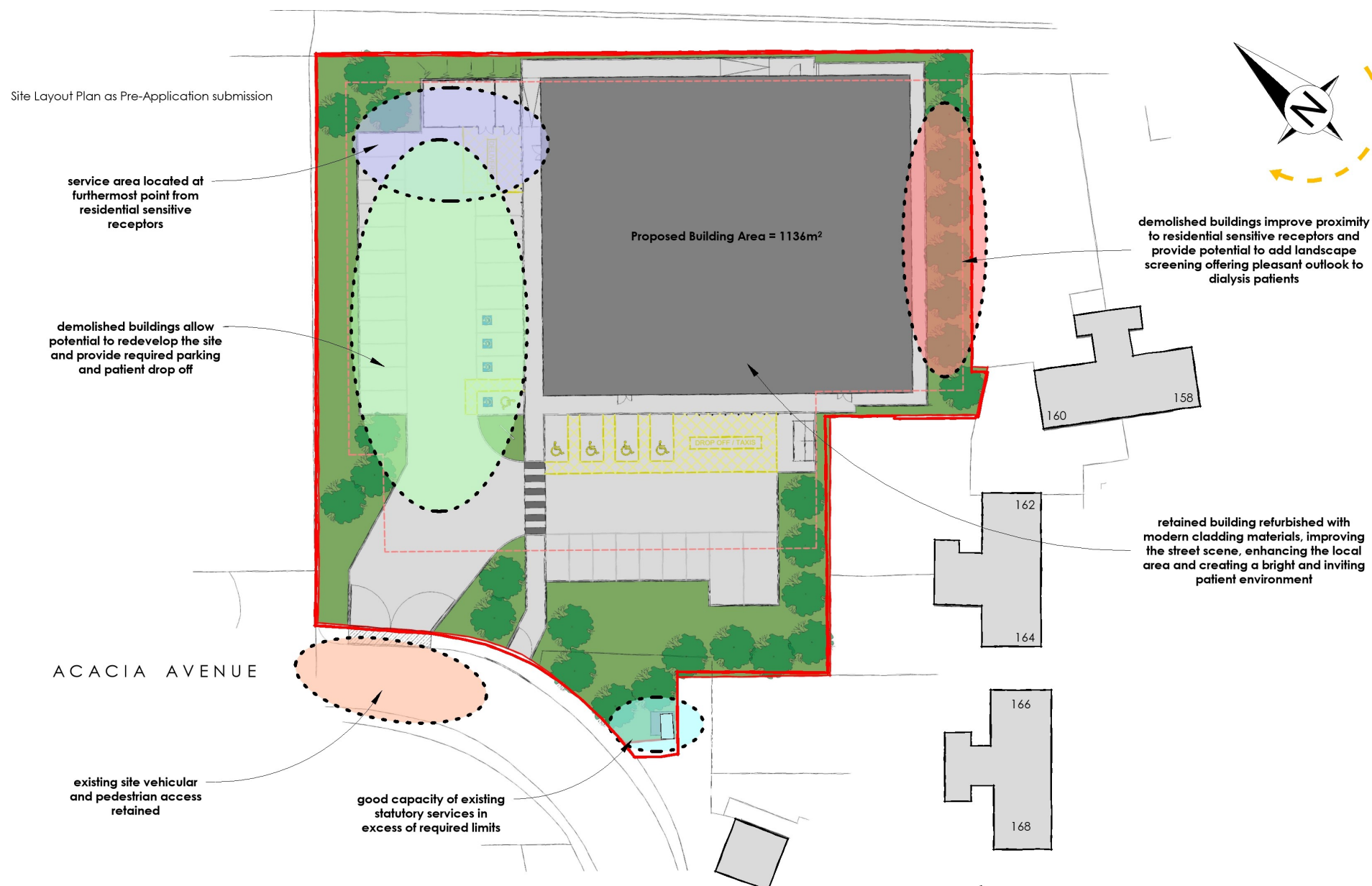
Favourable North Western Boundary - adjacent car park for nearby commercial unit, no sensitive receptors.

Constraints

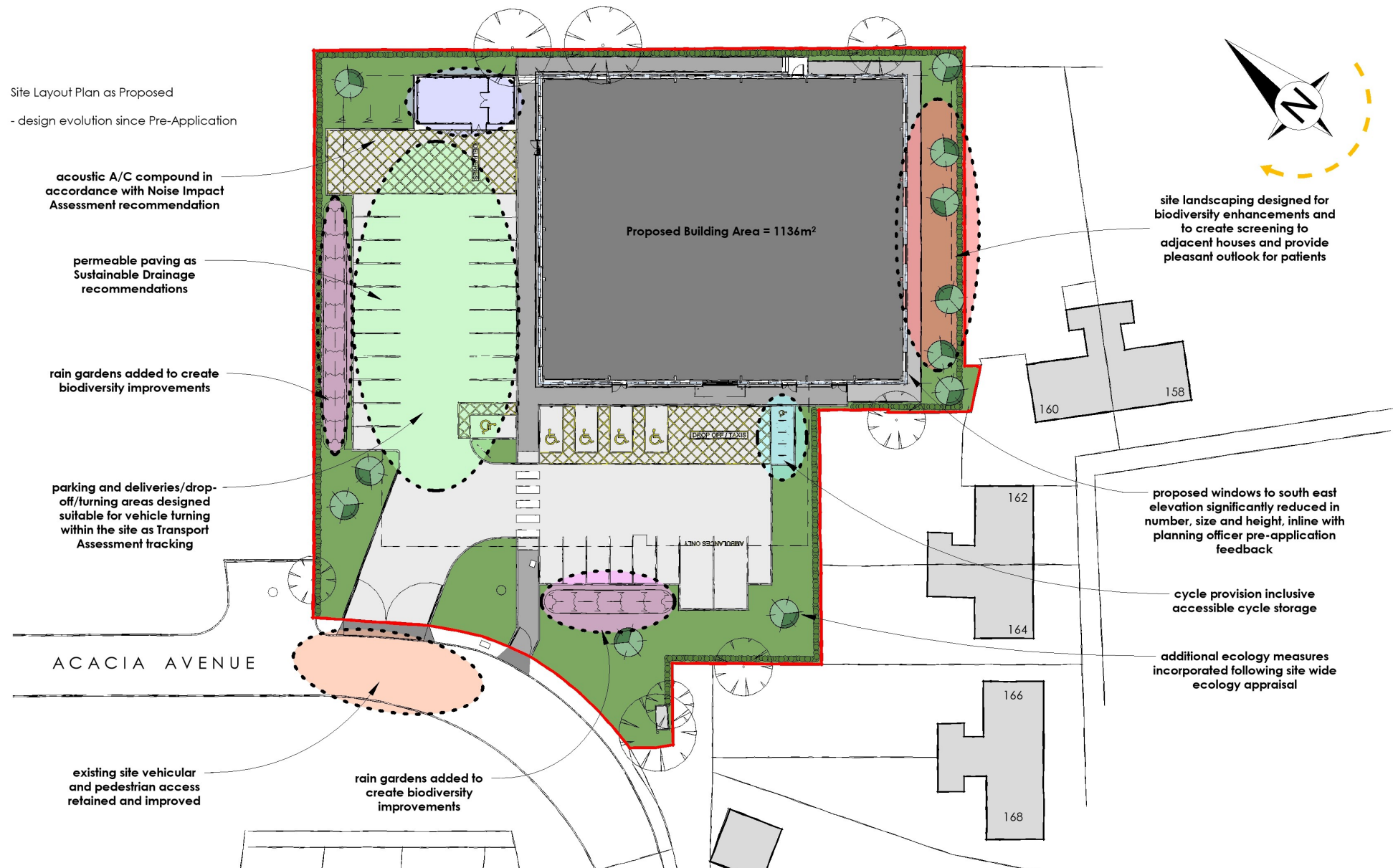
Parking & Servicing - lack of existing parking/servicing provision, creating the need for inclusion within the site redevelopment.

Nearby Residences - site in close proximity to sensitive residential receptors to the south of site.

DESIGN EVOLUTION - PART 1



DESIGN EVOLUTION - PART 2



PLANNING POLICY



Overview

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
- Neath Port Talbot Local Development Plan

4.2 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
- NPTCBC Supplementary Planning Guidance.

National Level

The Well-Being of Future Generations (Wales) Act 2015

4.3 The Well-being of Future Generations (Wales) Act came into force in 2015 and seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act puts in place seven well-being goals in order to make sure that everyone works towards the same vision. The well-being goals are set out to the left.

4.4 Within the Act, sustainable development is defined as follows: “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”. The Act

sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

National Development Framework: Future Wales – The National Plan 2040

4.5 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. ‘Future Wales’ sets out the Welsh Government’s strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.

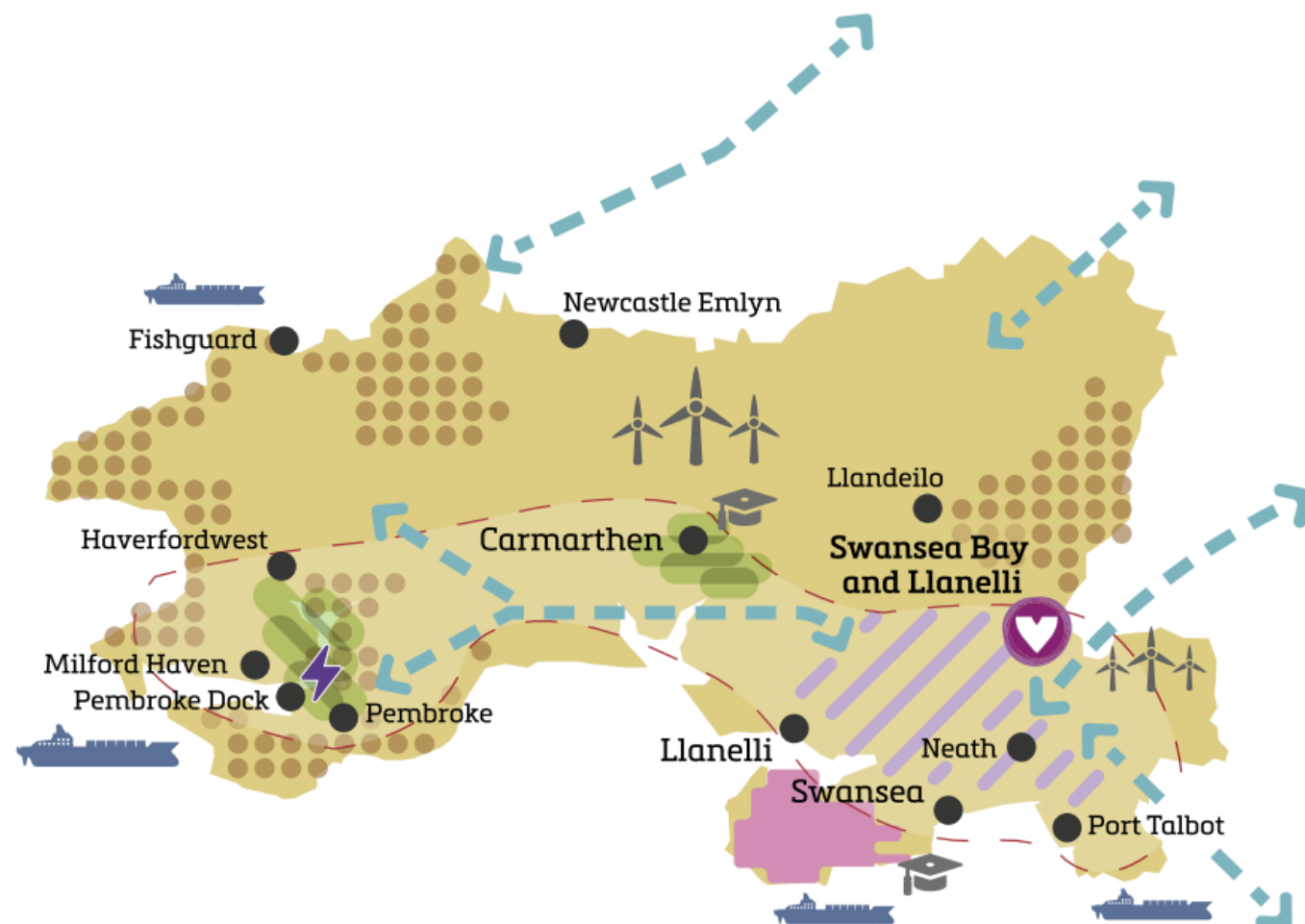
4.6 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years’ time, as follows:

A Wales where people live:

- 1....and work in connected, inclusive and healthy places
- 2....in vibrant rural places with access to homes, jobs and services
- 3....in distinctive regions that tackle health and socio-economic inequality through sustainable growth
- 4....in places with a thriving Welsh Language
- 5....and work in towns and cities which are a focus and springboard for sustainable growth
- 6....in places where prosperity, innovation and culture are promoted
- 7....in places where travel is sustainable

FUTURE WALES SOUTH WEST REGIONAL STRATEGIC DIAGRAM

Regional strategic diagram



National Growth Area	
Regional Growth Area	
National Connectivity	
Ports	
South West Metro	
Areas of Outstanding Natural Beauty	
Energy at the Haven Waterway	
National Parks	
Valleys Regional Park	
Pre-assessed Areas for Wind Energy	
Universities	

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- 8....in places with world-class digital infrastructure
- 9....in places that sustainably manage their natural resources and reduce pollution
- 10....in places with biodiverse, resilient and connected ecosystems
- 11....in places which are decarbonised and climate-resilient.

Planning Policy Wales Edition 12

4.7 Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW 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, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.

4.8 Sustainable Development is defined at Page 7 of PPW as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*.

4.9 Paragraph 1.18 sets out that *"Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated"*.

4.10 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example states that *"Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities"*.

4.11 Section 3 of PPW states that effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. The policy issues should not be considered in isolation from one another. This includes considering the design of a development and its impacts upon everyday lives as well as thinking holistically about where people might live and work and which areas should be protected.

4.12 Paragraph 3.3 emphasises that 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.

4.13 Paragraph 3.55 states that 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.

4.14 Paragraph 4.1.11 summarises that: *"Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services"*.

4.15 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.5 that *"The quality of the built environment should be enhanced by integrating green infrastructure into development through*

PLANNING POLICY

appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places".

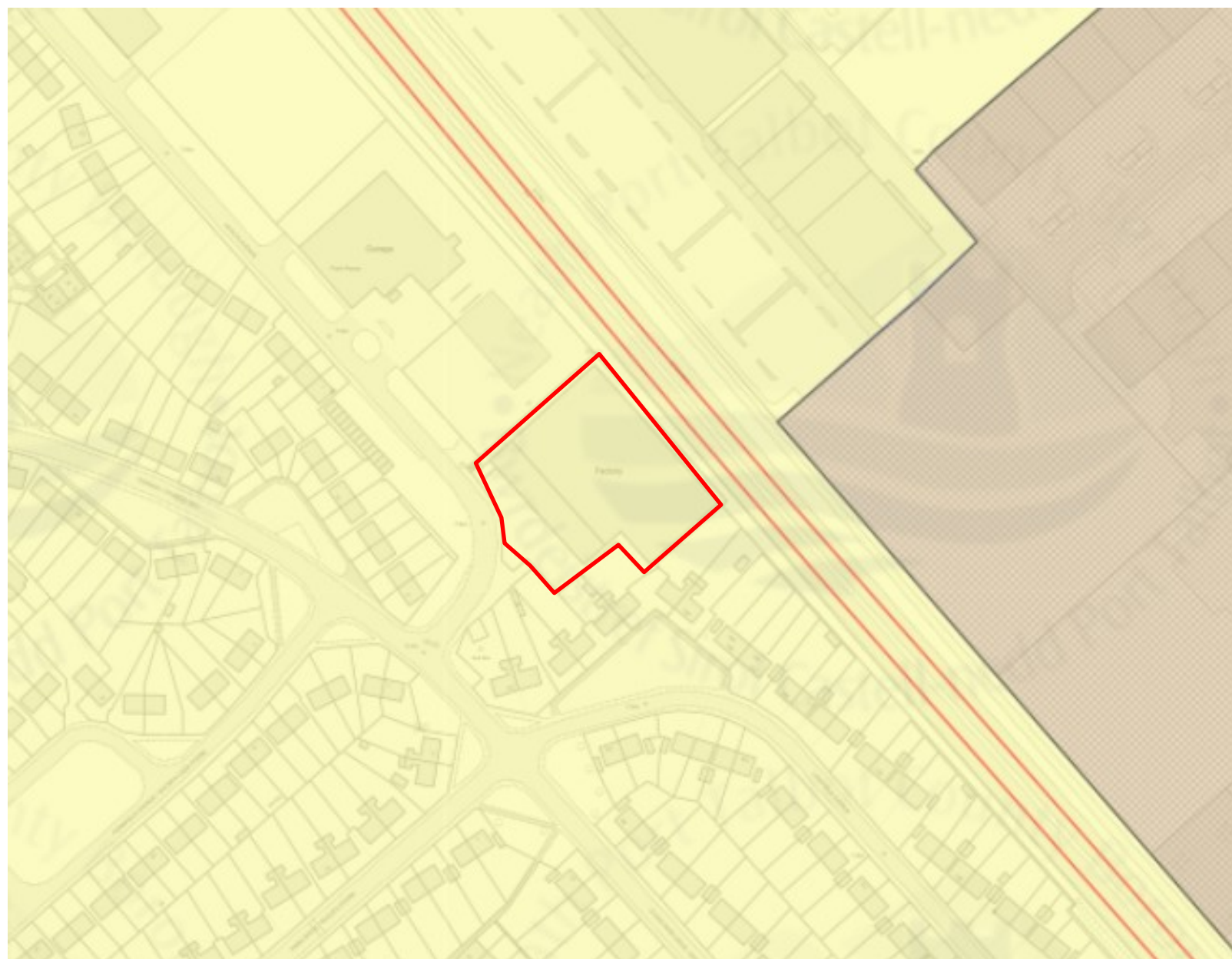
4.16 The importance of considering SuDs as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *"The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development". It is advised at Paragraph 6.6.19 that "Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified".*

Technical Advice Notes

4.17 The following Technical Advice Notes (TANs) are of relevance to the development proposal.

- TAN 4: Retail and Commercial Development (2006)
- TAN 5: Nature Conservation and Planning (2009)
- TAN 11: Noise (1997)
- TAN 12: Design (2016)
- TAN 18: Transport (2007)
- TAN 23: Economic Development (2014)

LDP PROPOSALS MAP

**Neath Port Talbot Local Development Plan 2011-2026****Proposals Map**Legend

Settlement Limit (SC1)



Existing Employment Area (EC2)



Primary & Core Road Networks



M4 Motorway



A465 (Trunk Road)



Core Road Network

PLANNING POLICY

Policy Reference	Relating to...
<i>Strategic Policies</i>	
SP 1	Climate Change
SP 2	Health
SP 3	Sustainable Communities
SP 10	Open Space
SP 11	Employment Growth
SP 15	Biodiversity & Geodiversity
SP 16	Environmental Protection
SP 18	Renewable & Low Carbon Energy
SP 21	Built Environment & Historic Heritage
<i>Topic bases Policies</i>	
OS 1	Open Space Provision
EN 6	Important Biodiversity & Geodiversity Sites
EN 7	Important Natural Features
EN 8	Pollution and Land Stability
TR 2	Design & Access of New Development
DE 1	Design
RE 2	Renewable & Low Carbon Energy in New Development

Local Level

4.18 The development plan that encompasses the application site is the Neath Port Talbot Local Development Plan 2011-2026, adopted in January 2016.

4.19 The LDP Proposals Map indicates the subject site is situated within the defined settlement boundary. The application site is not subject to a site-specific designation or allocation and therefore represents 'white land', where a range of development should be acceptable in principle. Policies of relevance are discussed below:

Policy SC1 Settlement Limits indicates 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. The supporting policy text states "all settlements have defined limits, with greater potential for development incorporated for settlements that are higher in the hierarchy".

Furthermore, "They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the strategy".

Policy SP 3 Sustainable Communities indicates 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..

Port Talbot is identified at the top of the settlement hierarchy, within the 'town' tier of the hierarchy. The role and function of towns is defined as "Regionally important settlements providing the widest and most diverse range of functions. Located on the strategic road network, they are fully accessible by a range of transport options".

Policy SP 5 Development in the Coastal Corridor Strategy Area indicates "In the Coastal Corridor Strategy Area, sustainable growth and development will be promoted to benefit the County Borough as a whole, while protecting and enhancing the area's character and environment. This will be achieved through the following area-specific measures (inter alia):

4. Safeguarding existing employment uses and sites for employment purposes"

Policy SP 11 Employment Growth indicates "existing employment uses will be supported and safeguarded and new and expanding employment developments will be encouraged through the following measures (inter alia):

4. Premises in existing appropriate lawful employment use will be safeguarded for employment purposes"

The supporting policy text indicates existing employment land and premises "will continue to play an important role in supporting the local economy. They will be safeguarded for employment uses wherever appropriate, including broader categories of uses than those within Class B such as ancillary cafés, day nurseries and commercial services which provide employment opportunities and necessary amenities".

PLANNING POLICY

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”.

Policy EC4 Protection of Existing Employment Uses indicates “proposals which would result in the loss of existing land or buildings in employment use as defined in Policy EC3 and/or within the existing employment areas identified in Policy EC2, will only be permitted where the following criteria are satisfied:

1. It is demonstrated that employment uses are no longer viable or appropriate in this location; or
2. Continued use for employment purposes would have unacceptable impacts on the environment, local amenity or adjacent uses; or
3. The existing space can be redeveloped for employment uses that achieve an increased level of employment combined with other appropriate uses.”

The supporting policy text states at paragraph 5.2.24 “in order to enable flexibility for the appropriate re-use of such sites, the policy aims to provide a basis for assessing applications for the conversion of existing employment areas, land and premises to non-employment uses”.

Paragraph 5.2.25 indicates “The applicant will be required to demonstrate that employment uses as identified in Policy EC3 are no longer viable or appropriate in that location. The type of evidence required will vary depending on the use and circumstances but may include details of why the land / premises is no longer in use and evidence to show that reasonable efforts have been made to market it for sale or lease for its existing use”.

Supplementary Planning Guidance

4.20 The following Supplementary Planning Guidance (SPG) adopted by Neath Port Talbot CBC is of relevance to the proposed development:

- Planning Obligations – 2016
- Parking Standards – 2016
- Biodiversity and Geodiversity – 2018
- Renewable & Low Carbon Energy – 2017
- Design - 2017

PROPOSED CONTEXT VIEWS



THE PROPOSAL

Overview

8.1 The proposed comprises the redevelopment of Stationery House, including the part demolition of existing factory building and rebuilding work, change of use from vacant factory (Use Class B1 & B8) to form a Satellite Dialysis Unit (Use Class D1), including alterations to the existing building, with associated car parking, landscaping, refuse storage and engineering works.

Access and Movement

8.2 Vehicular access to the site will be via the existing site access junction directly off Acacia Avenue. It is intended that refuse and emergency vehicles will be able to enter and exit the site by turning within the demise of the site.

8.6 Proposed active travel access to the site is to be provided via shared pathway and gate located to the east of the vehicular access. Pedestrian infrastructure within the immediate vicinity of the site is of a reasonable quality and as discussed above, there is continuous footway provision on the southern edge of carriageway of approximately 1.5m wide for the extent of Acacia Avenue which fronts residential dwellings located on here. To the east of the site, there is footway provision on both sides until the Acacia Avenue/Fairway priority junction. At this junction there is a dropped kerb and tactile paving on the western side of carriageway only.

8.3 It should be noted the provision of a new dialysis unit in Port Talbot will reduce the need of and distance of travel for patients who reside in Neath Port Talbot.

Amount, Scale & Layout

8.4 The proposed development seeks to minimise and improve the impact of the development on its surroundings with demolition of circa half of the existing building footprint, allowing the provision of landscape buffer zones to the adjoining housing thereby providing improved outlook and amenity to neighbouring residents.

Materials

8.5 The development will seek to demolish a substantial part of the existing buildings to create a more desirable area for development and to make the internal space useable as a Healthcare facility. Existing roof and wall materials will be replaced with modern insulated materials as part of the

proposed adaptations.

8.6 The design of the Unit will utilise modern cladding materials in a combination of profiles and colours creating a distinct modern healthcare feel. Extensive use of glazing throughout the building will create a bright and inviting patient environment.

Landscape and Biodiversity

8.7 The impact of the new development will be mitigated by creating new planting zones, wildflower meadows and other landscape features which will improve biodiversity, provide important ecological habitats and enhance the amenity value of the site.

8.8 The successful establishment of the landscape design for the site will provide a network of healthy, multi-functional and biodiverse green spaces, capable of delivering a wide range of environmental and quality of life benefits for people and wildlife.

Community Safety

8.9 TAN 12 suggests that community safety can be achieved via design solutions that can aid crime prevention. These include providing natural surveillance, improving safety by reducing conflicts in uses, and promoting a sense of ownership and responsibility.

8.10 It is considered that the site has been developed to reduce concealed areas that are not overlooked. Importantly this includes all areas of car parking which will be appropriately lit and naturally overlooked.

Community Involvement

8.11 In accordance with Part 1A of the 'Town and Country Planning (Development Management Procedures) (Wales) (Amended) Order 2016' (DMPO 2016), all major (Amended) Order 2016' (DMPO 2016), all major developments are required to be subject of preapplication consultation, prior to the Planning Application being validated by the Local

Planning Authority.

8.12 A full comprehensive summary of the pre-application consultation is to be included within the accompanying pre-application consultation report, following responses received by statutory consultees as well as local councillors and residents.

Energy Efficiency & Sustainability

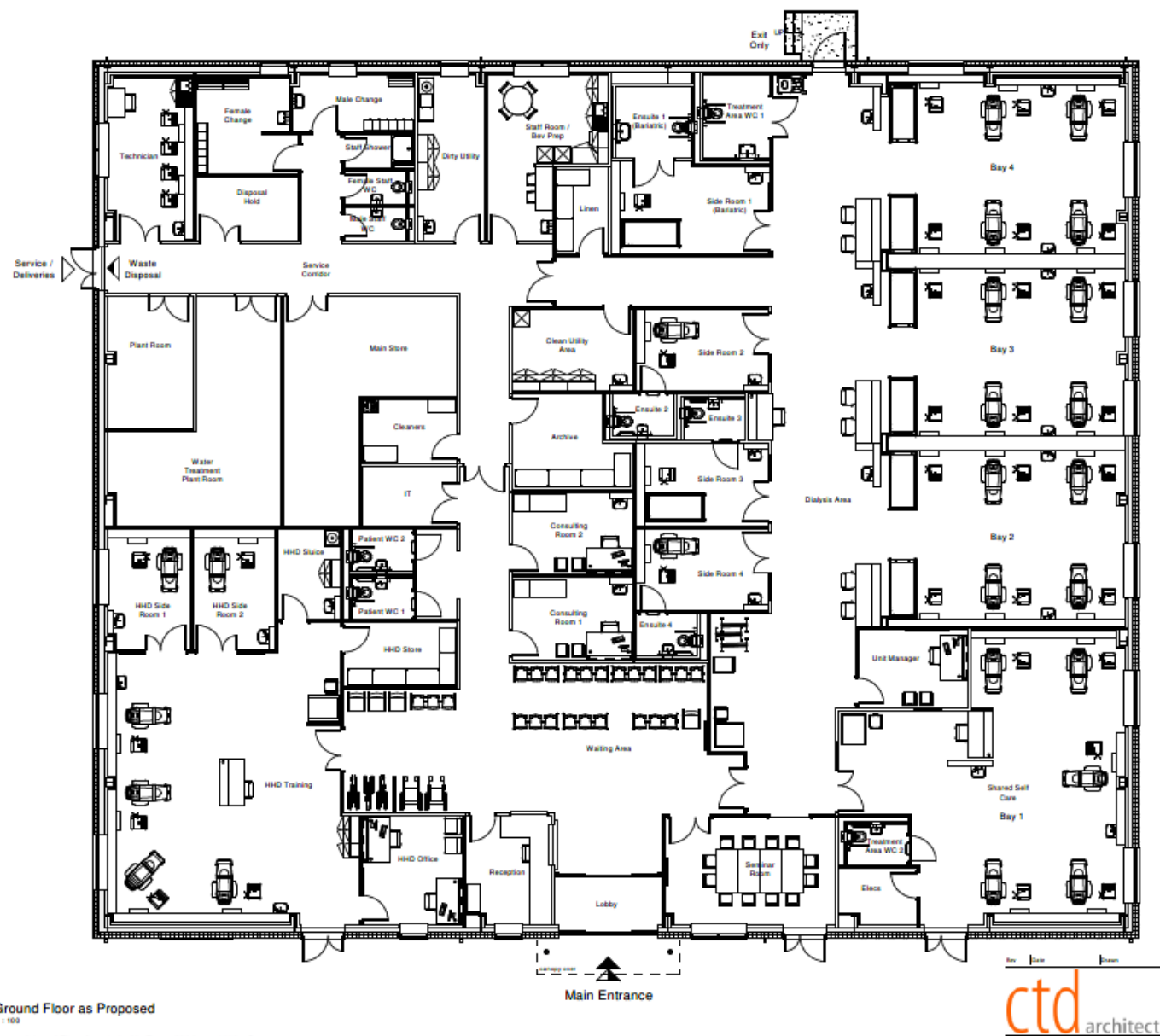
8.13 A fabric first approach is adopted with enhanced insulation levels beyond the minimum Part L standards. This results in a 3.8% reduction in Co2 emissions through lower heating demand.

8.14 The scheme will utilise air conditioning through air source heat pump split system VRF as a means of supplying heating and cooling through an energy efficient, on-site low carbon energy source. This is considered the most appropriate renewable or low-carbon energy source for the scheme as it would deliver heating and cooling to most occupied spaces in an energy efficient manner and ensure exceptional thermal comfort for the building users which is an essential aim of the development.

8.15 In addition, incorporating mechanical ventilation with heat recovery (MVHR) to make use of waste heat and low energy LED lighting is proposed, maximising energy demand reduction. Overall, Co2 emissions are reduced by 1.9 tCO2/year, approximately 14% lower than the Part L compliant baseline emissions scenario.



GENERAL ARRANGEMENT PLAN



PROPOSED CONTEXT VIEWS



PROPOSED CONTEXT VIEWS



CONCLUSION

9.1 This Design and Access Statement has been prepared on behalf of Fresenius Medical Care Renal Services Ltd for the proposed redevelopment of Stationery House, including the part demolition of existing factory building and rebuilding work, change of use from vacant factory (Use Class B1 & B8) to form a Satellite Dialysis Unit (Use Class D1), including alterations to the existing building, with associated car parking, landscaping, refuse storage and engineering works at Stationery House, Acacia Avenue, Sandfields, Port Talbot, SA12 7DN.

9.2 This DAS has demonstrated that the development, as proposed, is compliant with relevant policies contained within the adopted Neath Port Talbot Local Development Plan and is considered to be in accordance with the document.

9.3 A comprehensive assessment of the proposal is provided in the Planning Statement that accompanies this application. Separate supporting documents in respect of material considerations are also included in the application package and highlight the proposal as acceptable in all regards.

9.4 As such, it is concluded that the proposal fully accords with both national and local policies. Furthermore, there are no material considerations which would prevent the planning application from being determined in accordance with the relevant planning policy framework. In this respect, it is respectfully requested that Local Planning Authority consider this planning application favourably and grant planning permission for the proposed development.