

PLANNING STATEMENT

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

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

September 2024



Summary

Proposal:

"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

Project Reference:

S24.144

Client:

Fresenius Medical Care Renal Services Ltd

Product of:

Asbri Planning Limited
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Disclaimer:

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Contents

Section 1

Introduction & Background

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 & Background

- 1.1 This Planning Statement has been prepared by Asbri Planning on behalf of the applicant, Fresenius Medical Care Renal Services Ltd, in support of a full planning application to be submitted to Neath Port Talbot County Borough Council 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.
- 1.2 The proposed 27 station Dialysis Unit comprises a new clinical facility initiated by the Swansea Bay University Local Health Board (SBUHB) to be managed and operated by Fresenius Medical Care UK Renal Services Ltd (FMC), all on behalf of NHS Wales, to provide improved out-patient renal dialysis treatment. The new facility would increase the overall capacity of renal dialysis services east of Swansea, supporting the NHS Wales overall requirement for an increased capacity for renal dialysis within the wider South West Wales region.
- 1.3 SBUHB have a requirement to continue to treat patients, with timescales established as critical / essential. The construction period for the facility would be fast-tracked and service commencement of the new facility would be implemented as soon as possible for patients in the South West Wales region to attain this life saving service closer to home.
- 1.4 The aim of the proposal 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.
- 1.5 People with chronic renal failure may require haemodialysis, as an outpatient, up to 3 times per 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. 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.

- 1.6 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. 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.
- 1.7 There is a 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 27 stations catering for 108 patients and 16,848 treatments per annum.
- 1.8 The Applicant has undertaken a site search for commercial property and new-build sites within the local area. Of the available property stock, the former factory, Stationery House was chosen for a number of key reasons:
- The location is within 30 minutes travel time for the majority of the current 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 via the local bus routes and railway station;
 - 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;
 - Further gains to renal patients at the site include new equipment, closer and free parking for patients along with a significantly refurbished modern unit meeting latest building regulations and Welsh government healthcare facilities guidelines.
- 1.9 As part of this application, the following application plans/drawings are submitted:

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

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

Document Name	Prepared By
Application Forms	Asbri Planning
Design & Access Statement	Asbri Planning
Construction Environmental Management Plan	Sandycroft
Construction Method Statement	Sandycroft
Highway Conditions Report	Sandycroft
Highway Condition Plan	Sandycroft
Drainage Strategy	Waterco
Preliminary Ecological Appraisal	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
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1.11 The 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 within the town of Port Talbot, situated approximately 1.9 km south east of the town centre. The application site extends to approximately 0.38 Ha and currently comprises a detached industrial warehouse unit with ancillary office space, with a single storey addition to the main warehouse unit that addresses Acacia Avenue. The site is accessed at the site's south western facing boundary, via Acacia Avenue. The site benefits from a dedicated car parking area which adjoins the unit frontage.
- 2.2 In respect of surroundings, the unit is set in an area of mixed uses, including residential, leisure, employment, education and healthcare. The site is bound by residential dwellings to the south and west of the application site which front Fairway and Lingfield Avenue, whilst employment uses are situated to the east and north. A fitness centre neighbours the site to the north west, whilst the A4241 runs parallel to the site's rear elevation. In terms of notable features in the surrounding area, Neath Port Talbot Hospital is situated approximately 450 metres south east of the subject site.
- 2.3 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. 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. 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.
- 2.4 In respect of environmental constraints, the Natural Resources Wales Development Advice Map indicates the site is located within Zone A and is considered to be at little or no risk of fluvial or coastal / tidal flooding. The Flood Map for Planning identifies the site to be within the Surface Water and Small Watercourses—Flood Zone 2 area with a 0.1% to 1% (1 in 1000 to 1 in 100) chance of flooding from surface water and/or small watercourses.
- 2.5 The Coal Authority online mapping indicates the application site is situated within the Coal Mining Reporting Area, however does not appear to fall within the Development High Risk Area.

3.0 Planning History

- 3.1 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:

Application Ref.	Proposal	Decision
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

- 3.2 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 associated 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 location 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 location 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.

- 3.3 This Planning Statement will demonstrate how the development proposals have positively responded to the feedback provided as part of the pre-application advice, therefore ensuring the proposal adheres to both local and national planning policy.

Pre-application Consultation

- 3.4 A Statutory Pre-application Consultation was undertaken by Asbri Planning (on behalf of the Applicant) between August and September 2024. The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) 2016 ('the 2016 Order') sets out the requirement to undertake pre-application consultation in respect of all planning applications for 'major' development. The proposal is categorised as 'major development' and is therefore accompanied by a Pre-Application Consultation Report as required by Article 2F(1) of the 2016 Order.
- 3.5 The consultation was held for 30 days, commencing on 9th August 2024 and concluding on 9th September 2024. A copy of the draft planning application was made available for inspection. Copies of the notice and consultation letters were provided to all owners & occupiers adjoining the application site, community consultees and specialist consultees. In response to the consultation, a single comment was received from adjoining owners and occupiers, which queried the internal layout of the proposal. These points were addressed in the accompanying PAC report.

- 3.6 In terms of community consultees, three locally elected members responded to the consultation, raising a range of queries which included flood risk, surface water drainage and access. The comments raised by community consultees are fully addressed within the accompanying PAC report.
- 3.7 In respect of specialist consultees, valuable comments were provided by Neath Port Talbot Highways & Drainage section. The proposals have directly responded to the requirements and guidance provided, and includes an amended car parking layout, which sets out details of (inter alia); increased sized parking bays, EV charging provision, revised parking spaces arrangement and revised vehicular gate positions.
- 3.8 It is therefore considered the proposals have considered and responded to the comments provided as part of the statutory pre-application consultation. Full details of the consultation undertaken can be viewed within the PAC Report, which accompanies the application submission.

4.0 The Proposed Development

- 4.1 The proposals seek 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.
- 4.2 The proposed 27 station Dialysis Unit comprises a new clinical facility initiated by the Swansea Bay University Local Health Board (SBUHB) to be managed and operated by Fresenius Medical Care UK Renal Services Ltd (FMC), all on behalf of NHS Wales, to provide improved out-patient renal dialysis treatment. The new facility would increase the overall capacity of renal dialysis services east of Swansea, supporting the NHS Wales overall requirement for an increased capacity for renal dialysis within the wider South West Wales region. The renal dialysis unit will initially provide capacity up to 27 stations catering for 108 patients and 16,848 treatments per annum.
- 4.3 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.
- 4.4 The proposed redevelopment of the site will completely transform the appearance of the building. A substantial amount of the existing buildings are to be demolished with only part of the original workshop portal frame to remain. 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.
- 4.5 The main entrance has been designed to be a focal point for visiting patients, with new entrance signage, curtain walling and glazed canopy. The overall impact of the proposed development provides a modern and aesthetically pleasing building, improving the street scene and enhancing the local area. The new facility will consist of a 1,136 sqm total internal footprint. The unit incorporates dedicated isolation facilities, inbuilt future expansion provision and a dedicated service entrance for deliveries and waste removal.
- 4.6 The redevelopment of the site will include parking for 32 cars inclusive of 5 disabled spaces together with non-emergency ambulance parking, patient drop-off and dedicated deliveries area. Both vehicular and

pedestrian access to the site remains unchanged, with non-emergency ambulance and disabled zones located near to the entrance for ease of access. The provision of Electric Vehicle Charging (EVC) points are also included within the footprint of the Renal Dialysis car park. Additionally, the proposal includes open hooped cycle parking.

4.7 It is anticipated that the proposed dialysis unit will be staffed on site as follows:

- 9 Clinical staff per day inclusive Registered Nurse / Dialysis Assistants / Health Care Assistants (approximately 18 people in total to be employed to cover shift patterns and alternating dialysis treatment days).
- 1 Clinic Manager per day
- 1 Admin Staff per day
- 2 Housekeepers per day
- 2 Home HD area staff per day

4.8 This level of staffing will be complemented by a number of visiting staff, which will include:

- 1 Consultant visiting once or twice weekly
- 1 Dietician visiting once or twice weekly
- 1 Technical engineer visiting once or twice weekly
- Other visiting healthcare professionals, one or two visits per week.

4.9 The Dialysis Unit has been designed for a total of 27 treatment stations. Each patient will need to be treated for up to 4 hours per session, 3 times per week. i.e. Patients treated on a Monday will return on Wednesday and Friday. Approximate shift and opening times are:

- Morning shift being 06:30am—12:00pm
- Afternoon shift being—12:00pm—6:30pm

4.10 Based on the SBUHB requirement of 2 shifts on alternate days to facilitate treatment for up to 108 patients, unit opening times for patients would be Monday to Saturday 6:30am—6:30 pm. The unit will normally be closed on Sundays, Christmas Day and New Year's Day except for any unforeseen business continuity requirements.

4.11 The overall hours of operation will vary depending on capacity and patient requirements. With an allowance for staff arrival/departure and for equipment setup alongside any out of hours maintenance/cleaning etc. The unit may subsequently require employee / contractor access between the hours of 06:00am and 23:00pm.

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 in 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), Future Wales: The National Plan 2040 and the appropriate Technical Advice Notes (TANs).
- 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 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 Policy 1 - Where Wales will grow indicates 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.
- 5.6 Policy 9 - Resilient Ecological Networks and Green Infrastructure indicates to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, Future Wales seeks to identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

- 5.7 Policy 28 – National Growth Area – Swansea Bay and Llanelli indicates Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region.

Neath Port Talbot Local Development Plan 2011-2026

- 5.8 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.
- 5.9 **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"*.
- 5.10 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"*.
- 5.11 **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.
- 5.12 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"*.
- 5.13 **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"*

5.14 **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"*

5.15 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".

5.16 **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.*

5.17 *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".*

5.18 **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."*

- 5.19 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"*.
- 5.20 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"*.
- 5.21 Further to the policies outlined above, the following policies are of relevance to the proposals.

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
BE 1	Design
RE 2	Renewable & Low Carbon Energy in New Development

Supplementary Planning Guidance

- 5.22 Supplementary Planning Guidance (SPG) is produced to provide further detail on certain policies and proposals contained within the Neath Port Talbot 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:

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

Planning Policy Wales Edition 12

- 5.23 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”.
- 5.24 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”.
- 5.25 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

- 5.26 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 11: Noise
- TAN 12: Design
- TAN 15: Development & Floodrisk
- 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
- Acceptability of Proposed Use
- Sustainability
- Design
- Impact Upon Neighbouring Residential Amenity
- Transport & Highways
- Parking
- Trees
- Landscaping & Green Infrastructure
- Noise
- Ecology & Biodiversity
- Drainage
- Energy
- Planning Obligations

Principle of Development

6.2 The application site is situated within the settlement boundary and is not allocated for a specific use within the adopted Neath Port Talbot LDP. Indeed, the LDP Proposals Map confirms the application site comprises unallocated 'white land', where a development of this nature at this location should be considered acceptable in principle.

6.3 As highlighted above, Policy SC 1 'Settlement Limits' indicates development within settlement limits that is proportionate in scale and form to the role and function of the settlement, as detailed within the Settlement Hierarchy will be acceptable in principle. The application site is located within the town of Port Talbot, which Policy SP 3 'Sustainable Communities' identifies at the top of the settlement hierarchy, where settlements should provide *"the widest and most diverse range of functions"*. Furthermore, Policy SP 3 indicates the delivery of sustainable communities will in part be achieved through defining settlement limits within which, development that accords with the settlement hierarchy will be permitted in principle. It is considered the proposed development is of an appropriate for a settlement at the peak of the Settlement Hierarchy and should be considered acceptable in principle.

- 6.4 In addition to the application site's location within the defined settlement boundary and a sustainable community at the peak of the Settlement Hierarchy, the proposal is situated within the 'Coastal Corridor Strategy Area' under Policy SP 5, which seeks to promote sustainable growth and development which benefits the County Borough as a whole. Directing the proposed development towards the Strategy Area therefore aligns with the strategic and spatial vision of the Plan and adheres to Policy SP 5.
- 6.5 Further to the local level policy context highlighted above, the proposed development seeks to utilise previously developed, brownfield land which correspond to the sustainability requirements of Planning Policy Wales Ed. 12. As highlighted in the preceding 'Proposal' section, the scheme seeks to retain elements of the existing steel frame structure, reducing the need for new building materials and the associated embodied construction energy. Whilst the proposed development is not for employment uses per se, the proposals will involve the employment of a number of staff, ensuring employment opportunities align with the sustainable settlement strategy of the adopted plan.
- 6.6 In summary it is considered a robust principle of development has been established at the subject site, evidenced through the proposals adherence to the policies noted above and compliance with the strategic and spatial vision of the adopted LDP, alongside the overarching sustainability objectives of PPW12 at a national level.

Acceptability of Proposed Use

- 6.7 The application site has historically operated as a mixture of manufacturing and storage / distribution uses, within use classes B1 (Business) and B8 (Storage or distribution), although the unit is currently vacant. Consequently, the application site is considered to be in employment use and is subject to Policy EC 3 'Employment Area Uses', which is protected under Policy EC 4 'Protection of Existing Employment Uses'.
- 6.8 As highlighted in the preceding Policy Context section, Policy EC 4 states: *"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."*

- 6.9 Furthermore, the supporting policy text indicates at paragraph 5.2.25 *"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"*.
- 6.10 In response to the requirements of Policy EC 4, a marketing exercise has been undertaken which demonstrates how the existing employment use is no longer viable at the application site. The property has been marketed by Knight Frank for sale since February 2024. The property has therefore been marketed for a period of approximately 6 months, with no prospect of attracting an occupier for employment uses (B1/B2/B8). The lack of interest from such an occupier highlights how employment uses are no longer viable at Stationery House.
- 6.11 In this time the application site has been vacant since February 2024. On this basis, it can be evidenced that reasonable efforts have been made to market the property for its existing use – with no prospect of attracting an employment user. Therefore, the proposal demonstrates compliance with criteria 1 of Policy EC 4. In summary, the loss of an existing employment use building is therefore justified.
- 6.12 In addition to the marketing exercise undertaken by Knight Frank, the applicant has prepared a search for an alternative site to accommodate the proposals.
- 6.13 The Applicant has also engaged in discussions with the Local Authority to establish the availability of Council owned sites and existing properties that may be capable of accommodating the proposed development. As a result of these discussions, no sites were identified as capable of hosting the proposals.
- 6.14 In order to demonstrate that the application site represents the most preferential and suitable location for the proposed development, Asbri Planning have prepared a search for a sequentially preferable site. Dialogue with the Local Planning Authority surrounding the pre-application advice indicated the application should consider the Town Centre First Policy advocated within Planning Policy Wales Ed 12 and TAN 4.

- 6.15 The approach adopted in this sequential site assessment is consistent with the recommendations and guidance set out in PPW and TAN 4 with regard to the sequential approach to site selection.
- 6.16 The general requirements of the sequential approach to site selection in the context of retail planning policy are set out at paragraphs 4.3.18 to 4.3.24 of PPW. Whilst it is acknowledged the proposals are not for retail uses it is considered the method advocated in PPW can be utilised to inform the search for an alternative, sequentially preferable site for the proposed development.
- 6.17 In summary, the sequential approach requires that all potential suitable and available town centre options, and then edge of centre options, are thoroughly assessed before out-of-centre sites are considered for key town centre uses. The approach requires pragmatism and flexibility from local planning authorities, developers and retailers alike. The onus of proof that more central sites have been thoroughly assessed rests with the developer.
- 6.18 Key considerations for carrying out the sequential test on each potential site include:
- The likelihood of the site becoming available within a reasonable period of time;
 - Suitability of the site for the proposed development; and
 - Viability for the proposed use
- 6.19 Asbri Planning has therefore conducted a sequential site search of the relevant nearby designated centres in order to ascertain whether there are any suitable, available and viable sites which could accommodate the proposed development. Bearing in mind the need for flexibility, the physical requirement to meet the needs of the proposed development have been taken to be:
- A site that can accommodate a floorspace requirement of approximately 1,163 sqm GIA. There is no prospect for disaggregation in this instance due to operational requirements;
 - A site that is located in close proximity to Neath Port Talbot Hospital;
 - A site or unit that has suitable access to accommodate dedicated patient and staff car parking, alongside circulation areas to enable ambulance drop off for patients.
- 6.20 The approach that has been adopted in this sequential site analysis will review available and marketed sites within Port Talbot. The sequential search identified the following sites/units within Port Talbot:

- Office - 36 Forge Road, Port Talbot – 84 sqm
- Restaurant unit - Station Road, Port Talbot – 557 sqm
- Office - Baglan Bay Innovation Centre, Baglan Energy Park – unit sizes up to 140 sqm
- Retail unit – 6 Station Road, Port Talbot – 550 sqm
- Former Rhodes Avenue changing facility – 292 sqm
- Business units – Addison Road, Port Talbot – 95 sqm
- Retail unit – 30-32 Station Road, Port Talbot – 323 sqm
- Retail unit - 28, 28a & 28b Commercial Road, Port Talbot – c. 60 sqm
- Ind. Unit – Rutherglen Centre, Port Talbot – c. 1850 sqm
- Ind. Unit - Unit 8 And 9 Seaway Parade – c. 1,036 sqm
- Office – The Grange, Port Talbot – c. 761 sqm
- Development land – Baglan Bay Retail Park – 9,900 sqm

6.21 The vacant units outlined above are identified to be currently marketed and therefore **available**. However, the sequential site search of vacant units within the defined Centre highlights the constrained, relatively small size of units within the Centre. All of the vacant units below the floorspace requirement threshold are physically too small to accommodate the proposed development. On this basis, such marketed and available units identified above are considered **unsuitable**. The units are therefore **discounted** from the sequential search.

6.22 Having discarded the sites which are physically too small to accommodate the extent of the development, the remaining sites are:

- Ind. Unit – Rutherglen Centre, Port Talbot – c. 1850 sqm
- Ind. Unit - Unit 8 And 9 Seaway Parade – c. 1,036 sqm
- Development land – Baglan Bay Retail Park – 9,900 sqm

6.23 Whilst these sites benefit from the space to accommodate the proposals they are all situated outside of the defined Port Talbot town centre and are therefore no more sequentially preferable than the application site. On this basis they are **discounted** from the sequential search.

6.24 In summary, the sequential test has identified that no sites can be considered available, suitable and viable, sequentially preferable alternatives in respect of the proposals. The proposed development is considered, therefore, to fully accord with local and national policy and guidance as well judicial and appeal authority with respect to the sequential approach.

Sustainability

- 6.25 The proposed development seeks the change of use of the application site, 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 greenfield site, resulting in higher levels of embodied energy as a consequence of the construction process and potentially the need for increased travel. The proposal is also located a short distance from the existing Neath Port Talbot Hospital, creating the sustainable co-location of health facilities, requiring less travel.
- 6.26 The change of use of the application site also represents the most efficient use of brownfield land and adheres to Welsh government’s policy narrative for sustainable resource management. As noted, in the preceding section, the proposal will re-use elements of the existing steel frame structure of the industrial unit. The proposal will bring a vacant site back in to functional use, to the benefit of the local community and wider Neath Port Talbot local authority area.
- 6.27 Alongside the sustainability merits of the scheme in respect of the most efficient use of brownfield land, the application site occupies an inherently sustainable location within a sustainable community at the peak of the Settlement Hierarchy, which is well served by transport infrastructure and is located in close proximity to services and facilities. Neath Port Talbot Hospital is positioned a short distance east of the site and co-location with the hospital is a crucial aspect of the proposed development, as detailed in the introductory section.
- 6.28 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. 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.
- 6.29 The nearest bus stop is located on Vivian Park Drive, c. 80 metres south of the application site, providing access to the 82 service which runs on an hourly basis during weekday daytime to Port Talbot bus station. 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.
- 6.30 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. To conclude, the proposed development can be considered inherently sustainable, in accordance with both local and national level planning policy.

Design

- 6.31 The development will seek to demolish 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.
- 6.32 The proposed redevelopment of the site will completely transform the appearance of the building. 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.
- 6.33 The main entrance has been designed to be a focal point for visiting patients, with new entrance signage, curtain walling and glazed canopy. The overall impact of the proposed development provides a modern and aesthetically pleasing building, improving the street scene and enhancing the local area. The new facility will consist of a 1,163 sqm total internal footprint. The unit incorporates dedicated isolation facilities, inbuilt future expansion provision and a dedicated service entrance for deliveries and waste removal.
- 6.34 The unit design ensures a patient-focused facility and journey of care where organisation and patient flow is pivotal to the design ensuring the best possible patient experience and well-being, whilst substantially reducing infection hazard from a clinical perspective.
- 6.35 In response to the feedback provided as part of the pre-application advice and as evidenced in the accompanying Design & Access Statement, the design proposals have evolved as the scheme has progressed from initial development conception stages through the pre-application stage. This has included alterations to the proposed windows in the south east elevation, which have been significantly reduced in number, size and height in order to ensure neighbouring residential amenity is maintained. Further design revisions have seen the inclusion of additional proposed landscaping at the site boundaries to enhance biodiversity and provide improved site screening. Improved Rain Gardens have been utilised to respond to the need for increased biodiversity values and enhanced surface water management, Further ecological measures have also been employed and incorporated throughout the site, including new planting following the site wide ecological appraisal.

- 6.36 In summary it is considered the design of the proposal represents a policy compliant scheme and adheres to Policy TR 2 Design & Access of New Development & Policy BE 1 Design.

Impact Upon Neighbouring Residential Amenity

- 6.37 The proposed development seeks to minimise and improve the impact of the development on its surroundings with the reduction 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.
- 6.38 As highlighted in the pre-application advice, the property is very dated and in need of significant refurbishment. The proposals will therefore provide visual betterment to the existing environment, to the benefit of the street scene and built environment. The pre-application advice confirms that the development 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 side boundaries”*.
- 6.39 The development would also result in the removal of a commercial use in close proximity to neighbouring residential dwellinghouses. It is envisaged this change of use will potentially benefit residential amenity, due to the activities associated with industrial uses, especially in respect of potential noise. It is considered the proposed non-residential use is more in keeping with the character of the area.
- 6.40 It is envisaged that the reduced footprint, massing and scale of the proposal will benefit residential amenity. Furthermore, the proposals will not result in overlooking or a loss of privacy for neighbouring occupiers. On this basis it is considered the development adheres to Policy BE 1 ‘Design’ of the adopted LDP which requires proposals to not have a significant adverse impact upon the amenity of occupiers of adjacent land.

Transport & Highways

- 6.41 A Transport Statement has been prepared by Asbri Transport in support of the application proposals and details the transport characteristics of the development. In order to assess the impact of the site on the existing transport infrastructure, the Statement assesses the likely level of vehicular trips generated by the proposed development. 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.

- 6.42 In terms of transport impact, it is important to consider given the nature of the proposed Renal Unit and the poor health of the majority of patients, that a large majority of patients will drive or be driven to the unit, with the mode share for active travel and public transport being low. The Statement indicates at paragraph 4.2.11 *"It is accepted practice that 60-70% of patients will travel to the Renal unit by Ambulance, supplied by the Non Emergency Patient Transport Service (NEPTS) or be dropped off by family or friends or by Taxi"*.
- 6.43 Given the high vehicular mode share for patients and staff the forecasted trip generation can be understood as the worst-case scenario in terms of trip generation. To summarise, in respect of trip generation the Statement finds the impact in traffic terms is minimal.
- 6.44 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.
- 6.45 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. The site is located within a densely populated residential area of Port Talbot, with established pedestrian routes and footway provision along both sides of the carriageway on most roads surrounding the site.
- 6.46 In respect of highways safety, the collision record for the 5-year period analysed does not raise any particular highways safety issues. This data shows above, there have been a total of 7 collisions within the assessed area; 6 slight and 1 serious collision. The collisions have involved 2 cyclists and involved a total of 11 vehicles. The 7 collisions have resulted in a total of 8 casualties.
- 6.47 Concluding, the Transport Statement finds "It is considered that there are no highways or transport reasons to preclude the grant of planning permission". On this basis, the scheme demonstrates compliance with Policy TR2 'Design & Access of New Development' of the adopted LDP.

Parking

- 6.48 In respect of parking provision, it is proposed that the scheme will be served by a total of 32 parking spaces including 5 disabled spaces and 4 spaces equipped with electric vehicle charging. This equates to 1 parking space per treatment station should the proposal be operated at maximum capacity. The proposal also provide 2 spaces dedicated for the use by Ambulances provided by the Non-Emergency Transport Services (NEPTS), as well as a drop/off pick up area.
- 6.49 The Neath Port Talbot Parking Standards Supplementary Planning Guidance (SPG) does not include a land use specific to the proposed Dialysis Unit. However, the proposals differ from the characteristics and parking requirements of the most comparable medical related uses including hospitals and health centres. This is due to the proposed dialysis unit having predictable arrivals and departures of patients as the use of the treatment stations would be managed.
- 6.50 Hence, it is considered that the proposed approach enables a more representative indication of demand in view of the specialist nature of the services to be provided at the dialysis unit. This can be broken down as follows:
- Patients - 1 space per 3 treatment stations: 10 spaces
 - Full-Time Staff – 15 maximum (9 clinical, 6 ancillary): 15 spaces
 - Visiting Staff – Maximum of 5 on any given day: 5 spaces
- 6.51 In respect of cycle parking, in accordance with the guidance in the HTM 07-03 NHS car parking management, cycle parking for 8 cycles will be provided immediately to the right of the building entrance as shown in the site layout. The NHS guidance does not provide any indication on the number of secure cycle spaces to be provided, but given the specific nature of the proposed facility, the number of patients cycling to access treatment will be very low, while the cycle mode share for staff is likely to be low. The proposed provision will be sufficient to accommodate for the likely demand for secure cycle parking at the proposed Renal Unit.
- 6.52 In summary it is considered the proposed parking provision is suitable and appropriate to serve the development scheme, in accordance with Policy TR 2 'Design and Access of New Development'.

Trees

- 6.53 An Arboricultural Report has been prepared by ArbTS in support of the development proposals. The purpose of this report is to assess the quality of the trees at Stationery House, Port Talbot, assess the arbori-

cultural impact of the proposed development design and provide details regarding the protection of retained trees during construction work. The tree survey was conducted by *Stephen Lucocq BSc (Hons), Tech Cert (ArborA), M.Arbor.A* on 24th June 2024. The Report provides the following findings and recommendations:

- No trees are required to be removed to facilitate the construction of the proposed development design.
- Root protection area potential damage can all be managed through the retention of existing surfacing and boundary fencing, which will ensure no significant long-term adverse impact will occur to any of the retained trees.
- The site has several Arboricultural constraints that must be considered in the development design phase. No trees are required to be removed to facilitate the construction of the proposed development design.
- 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.
- Adhering to the tree protection details in the Report, the proposed development can be constructed without any significant long-term adverse impact on the retained trees or the area's amenity.

6.54 In summary, it is considered the re-development of the site will not be constrained by the trees identified both within and neighbouring the site.

Landscaping & Green Infrastructure

6.55 A Landscaping Strategy and Green Infrastructure Statement has been prepared by DP Landscape Architecture in support of the development proposals. The Landscaping Strategy provides a comprehensive approach towards soft landscaping provision, seeking to promote biodiversity at the application site. The existing landscape has been assessed and important existing features have been identified. These will be retained and enhanced where possible and as appropriate, as part of the new landscape proposals for the site.

6.56 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.

- 6.57 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. On this basis it is envisaged the proposals will comply with Policy BE1 Design, Strategic Policy SP15 Biodiversity and Geodiversity, Strategic Policy SP16 Environmental Protection & Policy EN7 Important Natural Features.

Noise

- 6.58 A Noise Impact Assessment has been prepared by Acoustic Consultants in support of the development proposals. The report provides a noise impact assessment of the anticipated operational noise at the nearest residential noise sensitive receivers (NSRs). The noise impact assessment is based on the results of a background noise level survey and noise level predictions using manufacturer's noise data from a similar site.
- 6.59 Details of the proposed plant are not finalised at this early stage. However, we have been informed that there is a similar renal dialysis unit that our client has recently worked on serving a similar number of patients. We have been informed that it is likely the HVAC selection will be the same, as our client aims to keep continuity across the similar schemes. Plant noise limits derived from on-site measured noise data are provided. Noise limits are set in accordance with PPW, TAN11, and British Standard 4142:2014+A1:2019 (BS4142).
- 6.60 The Assessment provides the following findings and recommendations:
- In respect of boundary treatments and timber fencing proposed to the plant area, The fencing must be 2.5m high, comprising material with a minimum surface mass of 10kg/m². The access doors to the plant units are shielded from direct line of sight to the NSRs.
 - The proposed plant noise is expected to be below and equal to the background noise level during both the day and night periods. If the plant schedule listed in this report does not reflect the finalised plant specification, then plant limits have been provided that will need to be met.
 - With the proposed plant noise limits met, plant noise associated with the proposals will be of low impact in terms of BS4142 and plant noise from the proposals would not cause a change in behaviour or attitude and will achieve the aims of the PPW.

Ecology & Biodiversity

- 6.61 A Preliminary Phase Ecological Appraisal and Preliminary Roost Assessment has been prepared by Hawkeswood Ecology in support of the development proposals. The Appraisal provides the following findings and recommendations:
- The PRA found the building to support few obvious bat access points. The structure of the main building was a block and brick base to the unit with asbestos cladding and an asbestos roof. The front office section was brick built with some UPVC plastic shiplap to the guttering and metal profile roofing and wall cladding in areas.
 - Given the use of asbestos sheets and metal cladding the building was considered to be of moderate potential to support roosting bats as they can roost in the overlap between sheets and can access the cavities even when filled with glass fibre type insulation. Two observation surveys were undertaken in accordance with accepted guidelines. No emergence from the building was noted.
 - The Site was not considered to be of any particular biodiversity value and does not currently support roosting bats. It did support some interesting species found in local semi-natural habitats. Formalising this type of habitat in the landscape plan and offering opportunities to roosting bats and breeding birds offer a substantial increase in biodiversity value of the Site.
 - No specific reasons were noted that would prevent the proposed reconfiguring of the building to proceed, however recommendations are made in relation to bats during the demolition process.
- 6.62 On this basis it is envisaged that the ecological status of the site will not constrain the re-development of the site.. On this basis it is envisaged the proposals will comply with Strategic Policy SP15 Biodiversity and Geodiversity, Strategic Policy SP16 Environmental Protection & Policy EN7 Important Natural Features.

Drainage

- 6.63 A Drainage Strategy has been prepared by Waterco in support of the proposed development. The aim of the Drainage Strategy is to identify water management measures, including Sustainable Drainage Systems (SuDS), to provide surface water runoff reduction and treatment.
- 6.64 All methods of surface water discharge have been assessed. Infiltration techniques are not considered suitable due to the presence of

groundwater at 0.5m.bgl. In absence of a nearby watercourse or public surface water sewer, a connection to the public combined sewer is proposed.

- 6.65 Surface water from the site currently discharges to the public combined sewer which crosses the site. The existing connection will be retained. Discharge will be made at a limited rate of 2 l/s, providing significant betterment over the existing situation.
- 6.66 Surface water runoff up to the 1 in 100 year plus 40% climate change event will be attenuated on site. A total attenuation volume of 208m³ will be required to achieve the discharge rate and will be provided in the form of the sub-grade of permeable surfaced parking spaces. The sub-grade will be formed from a 0.3m depth of stone aggregate underlain by a 0.4m deep geo-cellular storage structure.
- 6.67 The sub-grade will be lined as to prevent groundwater ingress. A geo-cellular structure with suitable load bearing capacity such as the Polypipe Permavoid system will be used to enable shallow depth installation. Raingardens are also proposed to provide amenity and biodiversity benefits. Foul flows will be discharged to the public combined sewer crossing the site utilising the existing connection.
- 6.68 In summary, it is considered that surface water drainage will not constrain the re-development of the site. The proposals will therefore comply with Policy SP 16 Environmental Protection & Policy EN 8 Pollution and Land Stability.

Energy

- 6.69 An Energy Statement has been prepared by Viro in support of the development proposals and provides an overview of the relevant planning policies and placing emphasis on sustainability through energy efficient designs with low carbon and renewable technology appraisal. An overview of the proposed design is provided including fabric efficiency measures and energy efficient building services.
- 6.70 The assessment provides baseline energy and Co2 emissions results for the scheme which represent the worst acceptable performance standard dictated by Building Regulations Approved Document L (2021). This result is then used to assess proposed enhancements to the building design.
- 6.71 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.

- 6.72 Furthermore, the assessment has identified 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.
- 6.73 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. On this basis it is considered the proposal aligns with Policy RE2 Renewable and Low Carbon Energy in New Development.

Engineering

- 6.74 A Structural Appraisal of the premises has been undertaken by C2C Consulting Engineers in support of the proposed development. The Appraisal finds the existing structure could be adapted to incorporate the proposed changes. However, we would recommend that a formalised regime of repair and new construction is drawn up and undertaken which encompasses such items as the following.
- 6.75 It is proposed to demolish the ancillary buildings across the front elevation including the monopitch section of the steel framed structure located directly behind. In addition, a single bay of the portal frame is to be removed from the Northwest side and three bays from the Southeast, to provide an efficient building space for the end users' needs and increased external parking areas.
- 6.76 The new structure is to be formed across the side elevations of the revised portal framed footprint, to create the gable elevations. New foundations will be required to support the proposed replacement cladding across this elevation. Cladding rails are required to span between gable posts which will need to be sited off isolated foundations. Foundations are considered to be of a twin pile and reinforced cap nature ensuring they are supported off competent material.
- 6.77 The stability of the steel frame will need to be considered in both its temporary and permanent state. Roof bracing should be introduced into the end bays, it is considered that the existing bracing is not likely to be adequate to reuse and as a consequence replacement steel is to be added. Bracing will also need to be formed in the side elevations,

in addition to a review of the expected uplift loads which are likely to result in having to increase the foundation concrete locally in these areas to provide dead load to maintain equilibrium.

- 6.78 It was noted that a steel beam was absent at eaves level across the Northeast elevation, consideration should be given to incorporating a new tie beam at this level.
- 6.79 In general the primary steelwork and roof purlins appeared to be in good order, there was no notable deflections or distortions noted to the steel members or any discernible corrosion. However, the existing steel frame will require a thorough design appraisal to confirm its adequacy for conversion.
- 6.80 New rainwater goods are to be incorporated into the proposed development and formalisations of drainage onsite.
- 6.81 Notwithstanding the points above. C2C Consulting Engineers are satisfied the proposed new renal facility may be converted within the reduced footprint of the existing factory unit using where appropriate the existing or slightly modified support structure around any new load bearing construction.

Planning Obligations

- 6.82 The legislative basis for planning obligations is Section 106 of the Town and Country Planning Act 1990 as amended by Section 12 of the Planning and Compensation Act (1991). Guidance on planning obligations is further provided by Circular 13/97 (Planning Obligations), which sets out a number of tests for the use of planning obligations.
- 6.83 Any obligation must be necessary to make the proposed development acceptable in planning terms;
- The obligation must be relevant to planning;
 - The obligation must be directly related to the proposed development;
 - Obligations must be fairly and reasonably related in scale and kind to the proposed development;
 - Obligations must be reasonable in all other respect.
- 6.84 More recently, Part 11 of the Planning Act 2008 provided for the introduction of the Community Infrastructure Levy (CIL) to fund the provision of infrastructure in England and Wales. The Community Infrastructure Levy Regulations came into force on 6th April 2010. Regulation 122(2) gives legal effect to three of the tests from Circular 13/97, as follows:

"a planning obligation may only constitute a reason for granting planning permission if it complies with the three tests...namely, that it is: (a) Necessary to make the development acceptable in planning terms; (b) Directly related to the development; and (c) Fairly and reasonably related in scale and kind to the development."

- 6.85 The Local Planning Authority has an adopted Supplementary Planning Guidance (SPG) in relation to planning obligations, in October 2016, the SPG also seeks to provide greater clarity for all interested parties by considering the following: The approach and procedures the Council will apply where planning obligations are required;
- The types of development that might require planning obligations and the thresholds and trigger points that might apply to different types of development; and
 - The scale and, where appropriate, the mechanism for calculating the obligation
- 6.86 Policies Policy SP4 Infrastructure & Policy I1 Infrastructure Requirements of the LDP sets out the areas where contributions may be sought and recognises the requirement set out in PPW and Circular 13/97 in relation to the tests for the use of planning obligations. In terms of the pre-application response received by the applicant indicated that the proposed development would result in the creation of 1,163sq.m of new floorspace which would result in a required financial contribution of £98,681 towards Active Travel improvements.
- 6.87 The Active Travel (Wales) Act 2013 sets out the requirements for Local Authorities to take reasonable steps to enhance the provision made for, and to have regard to, the needs of walkers and cyclists so as to promote active travel journeys and secure new and improved active travel routes for connected purposes.
- 6.88 It is accepted that some proposals for new development can have impacts on the walking and cycle network. Paragraph B10 of Welsh Office Circular 13/97 (Planning Obligations) states '...in addition to new access roads and improved junctions...appropriate contributions may be sought towards improved measures for cyclists and pedestrians both on and where necessary, off the development'. TAN 18 (Transport) also stipulates that planning authorities may use planning obligations to secure improvements in cycling, whether as a result of a proposal on its own or cumulatively with other proposals.
- 6.89 Turning to the actual development proposed and the Local Planning Authority's requirements in terms of the necessity of a planning obligation in relation to active travel, this request must be viewed in the

context of the of the 3 relevant tests set out in the Community Infrastructure Levy Regulations and assessed accordingly.

6.90 In respect of whether the financial contribution is necessary to make the development acceptable in planning terms, attention is drawn to the current PAC response provided by the Head of Engineering & Transport on the 23rd August 2024. That response confirmed that in principal there were no objections to the siting of a Satellite Dialysis unit at the Former Factory at Stationery House, Acacia Avenue subject to various safety concerns regarding the layout of the proposed site being addressed. The response made no direct reference to the need for a financial contribution of £98,681 towards Active Travel improvements in order to overcome any fundamental transportation related impacts of the development. It should also be accepted that the Council have already undertaken improvements to active travel routes in proximity of the site which were completed in 2023 (FR-PT-SU065 and FR-PT-SU064) on Southdown Road and Southdown Court to improve walking and cycling links between Baglan Bay Retail Park and Sandfields housing estate. These works included:

- widening and resurfacing of path to enable shared-use of the path
- improvements to junctions including adding tactile crossing points throughout
- improvements to lighting near the bridge access

6.91 The development itself will due to its very nature have a limited demand in terms of active travel and this is set out within the accompanying Transport Statement. Whilst staff may utilise sustainable modes of transport including walking/cycling to the site, patients due to their ill health and the treatment which they will have on site will place little if any demand on the active travel network. As such the request for any financial contribution would not in our view directly related to the development proposed and its associated impacts.

6.92 Finally, in terms of any financial contribution this must be fairly and reasonably related in scale and kind to the development proposed. It is argued that the creation of a new satellite dialysis unit to serve a local medical need for the community, located in an area which has already active travel infrastructure and is of a scale and nature which will not have any significant impact on such existing infrastructure that no financial contribution is application in relation to this particular proposal.

7. Conclusion

7.1 This planning statement has provided the policy justification 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. This statement has demonstrated the scheme's compliance with planning policy at both a local and national level, establishing the following pertinent planning considerations:

- The application site is situated within the settlement boundary and is not allocated for a specific use within the adopted LDP. Indeed, the LDP Proposals Map confirms the application site comprises unallocated 'white land', where a development of this nature at this location should be considered acceptable in principle.
- It is considered a robust principle of development has been established at the subject site, evidenced through the proposals adherence to the policies noted above and compliance with the strategic and spatial vision of the adopted LDP, alongside the overarching sustainability objectives of PPW12 at a national level.
- It can be evidenced that reasonable efforts have been made to market the property for its existing use – with no prospect of attracting an employment user. Therefore, the proposal demonstrates compliance with criteria 1 of Policy EC 4. In summary, the loss of an existing employment use building is therefore justified.
- Whilst the proposed development is not for employment uses per se, the proposals will involve the employment of a number of staff, ensuring employment opportunities align with the sustainable settlement strategy of the adopted plan.
- The proposed development can be considered highly sustainable, in accordance with both local and national level planning policy.
- In addition to the key points addressed above, the scheme demonstrate compliance with all other material considerations including; highways & access, transport, parking, design, green infrastructure, landscaping, drainage and energy

7.2 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.