

# Land Off The Princess Margaret Way, Port Talbot, SA12 6FA

Proposed Erection, and Seasonal Occupancy, of Ferris  
Wheel, and Proposed Change of Use of Land to Allow for a  
Funfair (Sui Generis)

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## 1. Introduction

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### Background

- 1.1. This Planning Statement has been prepared in support of a full planning application, submitted on behalf of Studt's Events in relation to the following development proposal, located at Land Off The Princess Margaret Way, Port Talbot:

*'Proposed Ferris Wheel at Aberavon Promenade, and Proposed Change of Use of Lane to Sui Generis (Funfair)'*

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### Information Submitted in Support of the Application

- 1.2. The following information has been prepared in support of the planning application:

| Document           | Author |
|--------------------|--------|
| Application Forms  | GJP    |
| Planning Statement | GJP    |

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### Purpose and Structure of this Statement

- 1.3. This Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations raised by the proposals. The Statement also sets out reasoned justification in support of the proposed development. The statement is structured as follows:
- **Section 2** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site;
  - **Section 3** provides details of the development proposals and design objectives;
  - **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
  - **Section 5** analyses the key planning considerations arising from the proposed development (considering the planning policy context); and
  - **Section 6** sets out our conclusions.

## 2. Site and Surroundings

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### The Site

- 2.1. The site is located within Aberafan, along Aberavon beachfront, and within the administrative boundary of Neath Port Talbot. This application comprises of two separate, but equally connected, application boundaries. The smaller red line comprises the area proposed for the Ferris Wheel, whilst the larger uniform parcel of land comprises the area for the proposed funfair. An aerial extract of the site can be seen below for reference.



*Aerial View of the Site*

- 2.2. The cumulative site area extends to approximately 0.98, and can be seen the in wider surrounding context in the below extract.



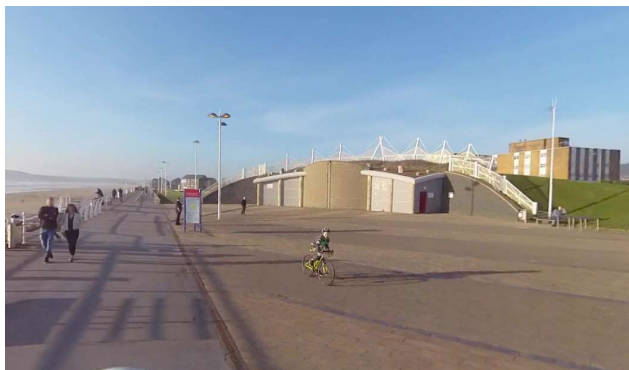
*Wider Aerial View of the Site*

## Site Surroundings and Sustainability

- 2.3. The site is located on Aberavon's beach front with many surrounding local amenities including, cafes, restaurants, the local football club etc.
- 2.4. The site is surrounded by open space to the northwest and southeast, with the promenade and beach adjoining the southwestern boundary of the application site, and The Princess Margaret Way running parallel to the site on its northeastern boundary.

### *Access & Parking*

- 2.5. The site is currently accessed via pavement off The Princess Margaret Way, and via the promenade shown in the photographs below:



*Street View of Proposed Ferris Wheel Location*



*Street View of Proposed Funfair Location*

- 2.6. As can be seen above, the site is predominately accessed via footpaths, although, public car parking is available within the surrounds. The existing car parking has been highlighted on the below map for reference.



*Wider Aerial Image of the Site (site boundary highlighted red and car parking highlighted yellow)*

### *Sustainability*

- 2.7. The site is situated within a sustainable location and is largely accessible by various forms of transport.
- 2.8. The nearest bus stop is located roughly 250m south of the site, along The Princess Margaret Way. Bus services run approximately every 60 minutes providing access to the wider Sandfields area.
- 2.9. Public footpaths and cycle paths are provided from to the north and south of the proposed development site, meaning the site is highly accessible and safe via foot/cycle.
- 2.10. As the site is accessible via public transport/on foot it lowers the reliance on car dependency and encourages sustainable transport and Active Travel. A Pay and Display Car Park is located within 300 metres of the site for those who do travel via car.
- 2.11. In light of the above, the site is located within a sustainable location where active and alternative modes of travel are available, and benefits from being in proximity to several local services and facilities.

### Planning History

- 2.12. A planning history search has been undertaken via Neath Port Talbot Council's online planning service. This search identified that the site has been subject to some previous planning applications.
- 2.13. The applications at the site are included within the table provided overleaf for reference:

| App. Ref        | Location                                                                                                     | Proposal                                                                                                                                   | Decision | Date       |
|-----------------|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|----------|------------|
| <b>The Site</b> |                                                                                                              |                                                                                                                                            |          |            |
| P2022/0619      | Land At Aberavon Beachfront, The Princess Margaret Way, Sandfields, Port Talbot, Neath Port Talbot, SA12 6QW | Proposed siting of No. 3 mobile trading vehicles for either A1 or A3 use on Aberavon Beachfront, vehicles to be removed from site each day | Approved | 05/06/2023 |
| P2007/0484      | Opposite Mini Roundabout At Apollo Cinema, The Princess Margaret Way, Sandfields, Port Talbot, SA12 6QW      | Erection of landmark sculpture                                                                                                             | Approved | 15/05/2007 |
| P2003/0638      | Land At Princess Margaret Way, Sandfields, Port Talbot, SA12 6QP                                             | Demolition Of Existing Toilets, And Rebuilding New Public Toilets Also Including New Plaza and Amphitheatre Area                           | Approved | 17/06/2003 |

### 3. Development Proposals

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#### Background

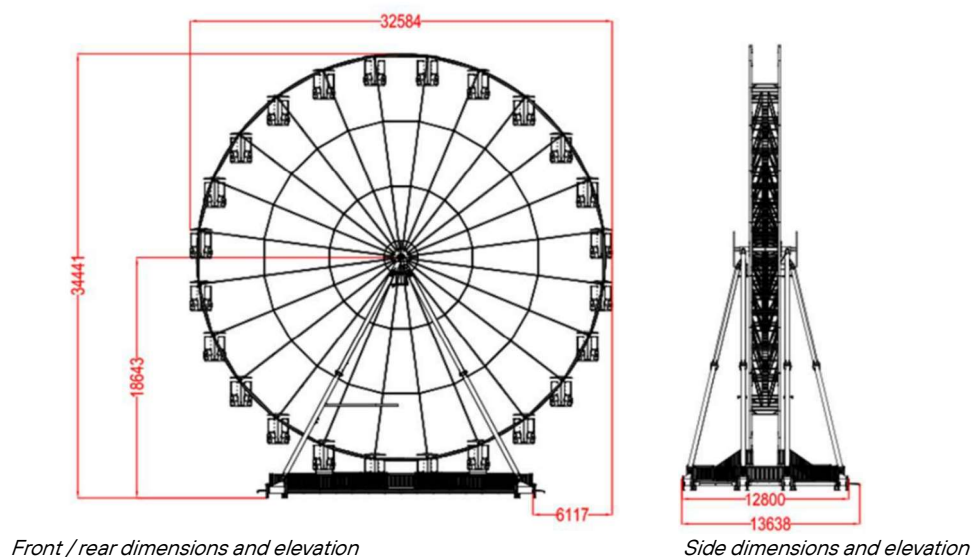
- 3.1. This chapter describes the elements which constitute the proposed development. It should be read in conjunction with the submitted application plans, drawings and other information. As indicated above, this application seeks full planning permission for the proposed development comprising the:

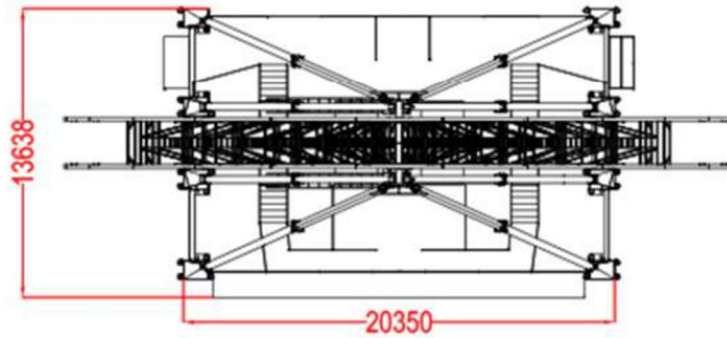
*'Proposed Erection, and Seasonal Occupancy, of Ferris Wheel, and Proposed Change of Use of Lane to Allow for a Funfair (Sui Generis)'*

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#### Ferris Wheel

- 3.2. The proposed Ferris Wheel will be assembled and transported in accordance with the detailed process found in the Ferris Wheel 36 Meter Manual by G-LP submitted alongside this statement. There are also daily, and weekly checks set out within the manual which will be complied with by the Applicant at all times.
- 3.3. The proposed Ferris Wheel will be utilised from 1<sup>st</sup> April to 30<sup>th</sup> September each year, and will operate between 10:00 and 22:00.
- 3.4. The proposed location of the Wheel is along the promenade of Aberavon Beachfront. The area is pedestrianised and easily accessible for wheelchair users and all other persons.
- 3.5. The dimensions and elevations illustrating the Ferris Wheel, are provided below for reference.





*Top dimensions and elevation*

- 3.6. As shown in the above drawings, the height of the wheel will be approximately 35m, and its width measures 13.6m.
- 3.7. The proposed development will also provide for 1no. confectionary stand located directly adjacent to the Ferris Wheel. Details of the proposed confectionary stand have not been provided at this stage – as the occupier of this space may change from season to season.

#### **Funfair**

- 3.8. The proposed development also comprises the material change of use of land to allow for a funfair. Given that the proposals are for the material change of use of land, the proposals have not provided a site / block plan at this stage.
- 3.9. The proposed funfair would be operational on the following dates:
- 11<sup>th</sup> April – 27<sup>th</sup> April 2025 (Easter); and
  - 25<sup>th</sup> July – 31<sup>st</sup> August 2025.
- 3.10. The proposed development will require up to seven days either side of the operating dates – to allow for operations to be set up, and taken down.
- 3.11. In terms of the dates of future years, these are yet to be clarified – as to allow for the proposals to operate around the school breaks / holidays as, and when, these have been identified.
- 3.12. The proposed hours of operation for the Funfair are from 11:00 to 21:00 – which allows for time to set up and lock up on each respective day.
- 3.13. The proposed development comprises 6 major rides. Details have not been provided of the specific rides at this stage – as this application merely seeks the material change of use of land. The rides will have no permanence, nor fixation to the ground, and accordingly, do not constitute operation development.
- 3.14. Details of the proposed rides have not been provided at this stage as the demands, and requirements, of the funfair may change from season to season. The flexibility to remove, and change, the rides that are located on site, is a typical feature, and draw, of such funfair attractions.
- 3.15. The proposed material change of use of land will also comprise the following:
- Three traditional food units located in the fair;
  - Two entrances, and two fire exits to allow for safe access to, and from, the fairground;
  - Heras fencing screening along the perimeter of the site;

- Silent generators, music / sound within the legal limit requirements, and no vibration generation from the rides; and
- Waste management facilities on site, managed and maintained by the applicant. The waste management facilities will include 10 bins on the fairground, and 2 bins around the Big Wheel

3.16. It should also be noted that the Applicant is currently advancing discussions regarding land means power – which will mean that generators are no longer needed on site. The generators that will be utilised in the meantime will run on low car diesel to reduce fumes emissions, and will produce minimal levels of noise.

3.17. Notwithstanding the above, the Applicant has been in active dialogue with Council regarding the above proposals, and the following measures have been included into the proposals to reduce any nuisance on neighbouring premises:

- All generators shall be switched off within 15 minutes of the course of the Big Wheel and funfair on each evening;
- The use of the public address microphones will be restricted to safety instructions only;
- The generators that are not fully sound proofed shall be boxed to reduce noise levels; and
- An operator will be on available on site at all times to deal with any complaints received.

3.18. In terms of employees, in total the Ferris Wheel and Funfair will employ a total of approximately 50 people, with the aim to employ 20 people from the local area.

## 4. Planning Policy Context

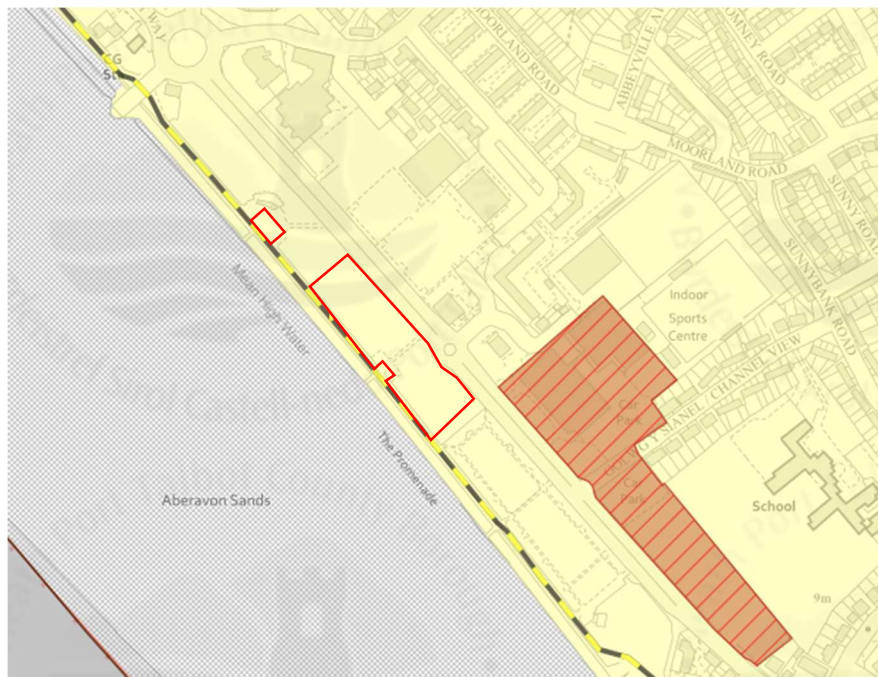
### Background

- 4.1. A review of the planning policy context associated with the site and proposed development (at the national and local level) which are of relevance to the determination of the application are outlined and provided within 'Appendix A – National Planning Policies'.
- 4.2. A detailed assessment of how the proposed development accords with these policies is provided in Section 5 (Material Considerations) of this Statement.

### Local Planning Policy

- 4.3. In current development plan for the Local Planning Authority comprises the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) which was adopted in January 2016.

### LDP Proposals Maps



LDP Proposals Map Extract (site shown illustratively in red)

| Key |                      |  |                               |
|-----|----------------------|--|-------------------------------|
|     | Wales Coast Path     |  | Mixed Use Regeneration Scheme |
|     | Housing Allocation   |  | Settlement Limit              |
|     | Safeguarded Minerals |  |                               |

- 4.4. As shown in the above LDP Proposals Map extract, the key planning designations of relevance to the site are as follows:

- The site is located within settlement limits;
- The site is located directly adjacent to the Wales Coast Path;
- The site is located directly adjacent to a housing allocation;
- The site is located directly adjacent to a mixed use regeneration scheme; and
- The site is located directly adjacent to a mineral safeguarding area.

### LDP Constraints Maps



LDP Constraints Map Extract (site shown illustratively in yellow)

| Key |                     |  |                          |
|-----|---------------------|--|--------------------------|
|     | Candidate Site 2022 |  | Flood Zone 2 - Seas      |
|     | Flood Zone 3 - Seas |  | Port Talbot Spatial Area |
|     | Wards Current       |  | Wards (pre April 2022)   |

4.5. As shown in the above LDP Constraints Map extract, the key planning constraints of relevance to the site are as follows:

- The site was previously proposed as a candidate site;
- The site is located within the Port Talbot Spatial Area;
- The site is located directly adjacent to a Flood Zone 2 for seas;
- The site is located directly adjacent to a Flood Zone 3 for seas; and
- The site is located within the Ward of Sandfields East ED.

4.6. Considering the above, it is considered that the most relevant policies of the adopted LDP for this application are as follows:

- **Strategic Policy SP3:** Sustainable Communities;
- **Strategic Policy SP10:** Open Space;
- **Strategic Policy SP13:** Tourism;
- **Strategic Policy SP15:** Biodiversity and Geodiversity.

- **Policy EN6:** Important Biodiversity and Geodiversity Sites;
- **Policy EN7:** Important Natural Features;
- **Policy EN8:** Pollution and Land Stability;
- **Policy TR2:** Design and Access of New Development;
- **Policy BE1:** Design. and
- **Policy W3:** Waste Management in New Development.

4.7. In light of the above Policies, it is considered that Strategic Policy SP13 (Tourism) is of most relevance to this proposal. Strategic Policy SP13 states:

*"Tourism*

*The economic prosperity of Neath Port Talbot will be promoted through encouraging continued growth in the tourist sector by:*

1. *Encouraging high quality, sustainable tourism development;*
2. *Providing a flexible approach to the development and conversions to tourism facilities;*
3. *Resisting, where appropriate, proposals which would result in the loss of tourism facilities;*
4. *Supporting tourism proposals through the allocation of land for tourism development."*

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## Supplementary Planning Guidance

4.8. In following Supplementary Planning Guidance (SPG) have also been taken into consideration:

- Development and Biodiversity (Adopted February 2021); and
  - Pollution (Adopted October 2016).
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## 5. Material Considerations

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### Key Planning Considerations

5.1. The key planning considerations arising from the proposed development (considering the nature and form of the proposed development and the planning policy context outlined within the preceding section of the Statement) are as follows:

- Principle of Development;
- Design, Character and Appearance;
- Landscape and Visual Impact;
- Highways and Sustainability;
- Ecology, Green Infrastructure, and Biodiversity Net Gain;
- Noise;
- Air Quality;
- Waste Management; and
- Other Material Considerations.

5.2. These issues are discussed in further detail below.

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### Principle of Development

5.3. National Planning Policy sets out the key role that tourism can play in both Paragraph 5.5.1 of PPW 12 outlines the key role that tourism can play in both advancing and protecting the built and natural environment, noting that *'Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection'*.

5.4. PPW expands on this by stating that the planning system *'encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities'*.

5.5. Moreover, PPW states in Paragraph 5.5.7 that *'Planning authorities should adopt positive approaches to proposals which utilise previously developed or disused land and water bodies for tourism uses, particularly in relation to urban regeneration'*.

5.6. It is therefore unequivocally clear that the proposals comply with the prevailing aspirations and objections of PPW 12.

5.7. In terms of Local Planning Policy, Strategic Policy SP13 encourages the continued growth in the tourist sector (in the interests of the area's economic prosperity), and specifically encourages high-quality, sustainable tourism development. In so doing, the amplification text within paragraph 5.2.52 advocates a flexible approach to proposals.

5.8. In light of the above, given that the proposed development consists of the erection of a Ferris Wheel – which will contribute positively to the high-quality and sustainable approach to Tourism in the wider County, and also the material change of use of land to allow for a funfair – which will also contribute positively to the wider Tourism sector of the county, it is considered that the principle of development is acceptable.

- 5.9. Notwithstanding the above, Paragraph 5.2.53 sets out that *'whilst flexibility is applied, proposals will be required to demonstrate they are sustainable in terms of location, accessibility and do not have an adverse impact on the environment'*. As such, these aspects of the proposal will be discussed in more detail below.
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## Design, Character and Appearance

- 5.10. In regard to the design, the proposed Ferris wheel aims to ensure that the character and appearance of the surrounding area is preserved and protects. The proposed development includes a typical Ferris Wheel design – which is a distinct and notable feature of beachfront locations. Examples of Ferris Wheel's in such locations can be found at Llandudno Pier and Swansea Waterfront.
- 5.11. Policy BE1 (Design) sets out that all *"All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places."*

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

1. *It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;*
2. *It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;*
3. *It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;*
4. *It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;*
5. *Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;*
6. *It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);*
7. *It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;*
8. *It uses resources, including land and energy, as efficiently as possible through:*
  - a) *Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;*
  - b) *The layout and form of the development does not preclude the reasonable use of other adjacent land;*
  - c) *Developing brownfield land in preference to greenfield land where possible;*
  - d) *Minimising building exposure while maximising solar gain.*
9. *Its drainage systems are designed to limit surface water run-of and flood risk and prevent pollution;*
10. *The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities"*

- 5.12. In regard to the above policy criteria, it is considered that the proposals are in accordance with the corresponding design principles as:

- The proposed design will complement and enhance the character and appearance of the surrounding Aberavon Beachfront, and will not adversely affect the surrounding area in terms of character, appearance, landscape or cultural heritage. Rather, it will enhance the character and appearance of the area by providing a traditional beachfront feature in this location;
- The proposals will retain green infrastructure features (please see submitted Green Infrastructure Statement);
- The proposed development will also provide for, and achieve, an attractive safe space located along Aberavon Beachfront – which benefits from sufficient lighting and ‘Secured by Design’ principles. Notwithstanding this, the proposals, by its very nature, will provide for a well-lit and ‘safe’ space;
- The site is accessible by all modes of transport, and allows for access by all (please see below ‘sustainability’ section); and
- The proposals make efficient use of land – not least as this land has been identified, and tendered, by Neath Port Talbot Council.

5.13. In terms of the proposed fairground, this aspect of the proposals comprises the material change of use of land, and as such, a site plan has not been provided – not least to provide the proposed development with the flexibility to change the rides that are located on site. This will allow for the Applicant to respond to the demands of the business, and continue to update the offer on site – which will in turn, continue to attract visitors. In any event, the rides that are located on site will not constitute operation development – as there is will be no permanence to the ground, and the rides can be moved with relative ease.

5.14. Notwithstanding the above, the proposed fairground will, by its very nature, enhance the seafront location of the site, and will be commensurate to the surrounding area – as it will provide for a typical seafront feature in this location.

5.15. In light of the above, it is considered that the proposals are wholly acceptable in regard to design, character and appearance.

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## Landscape and Visual Impact

5.16. In terms of landscape and visual impact, the proposals seek to utilise the open space which is located along The Princess Margaret Way, and bring the land into a beneficial use which will actively enhance Aberavon Beachfront.

5.17. As stated above, the proposed development, is of a nature typical to a seaside / beachfront location, and will therefore positively contribute to the surrounding area through maintaining a scale, form and design that is compatible with the character of the surrounds.

5.18. Given all of the above, it is considered that the proposals will not result in any detrimental impacts to the landscape, nor will it visually impact the surrounding area. Adversely, it is considered that the proposals will complement, and enhance, the seaside location, through providing a typical beachfront attraction along Aberavon Beachfront

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## Highways and Sustainability

5.19. The site can be accessed off The Princess Margaret Way, which runs directly adjacent to the site. Visitors to the site will utilise the existing highway infrastructure, which suitably serves the wider Aberavon Beachfront.

- 5.20. As demonstrated above in this document, the site is located within settlement limits, and as such, benefits from sustainable modes of travel. The site is located within 250m of an existing bus stop, which is serviced by the 82 bus service – which provides services to the wider Sandsfields area approximately every 60 minutes.
- 5.21. Further to the above, the site benefits from existing pedestrian infrastructure, which provides pedestrian access along both The Princess Margaret Way and the promenade.
- 5.22. Whilst the site is accessible both via public transport, and to pedestrians, given the nature of the proposals (tourism proposal), there will be some visitors who opt to travel to the site via private vehicle. For the visitors that do opt to travel to site via private vehicle, there is a car park located approximately 50m away from the site, on the opposite side of The Princess Margaret Way – where spaces are readily available.
- 5.23. In light of the above, it is considered that the proposals can be demonstrated to be compliant with Policy TR 2.
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## Ecology, Green Infrastructure, and Biodiversity Net Gain

- 5.24. Policies EN6 and EN7 of the LDP advocate for the mitigation of any impacts on biodiversity / nature features. Further to this, PPW promotes the net gain of biodiversity enhancement, and requests that a Green Infrastructure Statement be submitted alongside all Planning Applications. As such, a Green Infrastructure Statement has been prepared and submitted alongside this application. The content of the statement outlines that avoidance, mitigation, and enhancement can be provided as part of the scheme, and the applicant is open to discussion to allow for these measures to be achieved. Accordingly, in light of this, it is considered that the proposals accord with Policies EN6, EN7, and PPW 12.
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## Noise

- 5.25. Policy EN8 (Pollution and Land Stability) states that proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to an unacceptable risk due to Noise Pollution will not be permitted.
- 5.26. The subtext of Policy EN8 sets out that *"In relation to noise, potentially noisy proposals should not be located close to sensitive uses (such as hospitals, schools and housing) and new noise-sensitive developments should not be located near to existing noisy uses (including industry and existing or proposed transport infrastructure) unless it can be shown that adverse effects can be dealt with through mitigation measures incorporated into the design."*
- 5.27. Accordingly, the important context here is that the proposed development comprises the erection, and seasonal occupation, of a Ferris Wheel, and the material change of use of land to allow for a funfair along the promenade at Aberavon Beach. The proposed development is therefore, by its very nature, located in the most appropriate location.
- 5.28. In terms of the proposed Ferris Wheel, it is considered this will not generate a significant level of noise, and as a result, will not result in any adverse impact on the surrounding area.
- 5.29. As for the proposed funfair, this aspect of the proposals comprises the material change of use of land. It should be noted that the Applicant is a well-established operator of sites of this nature, and the proposed development will be subject to the appropriate noise management – which will restrict music / noise levels to

within the legal limits, and will ensure that all rides that are to be sited on the site will not result in a high level of noise or vibration concerns.

- 5.30. The Applicant is currently in process of obtaining land means power for the site – so any generators that are used to operate the funfair will be a temporary arrangement. The generators that will be used in the meantime will generate minimal levels of noise, and will run on low carbon diesel to reduce fumes emissions.
- 5.31. In light of the above, it is considered that noise resulting from the proposals does not propose a constraint to development, and as such, is acceptable accordingly.

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## Air Quality

- 5.32. Policy EN8 (Pollution and Land Stability) states that proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to an unacceptable risk due to Air Pollution will not be permitted.
- 5.33. The proposed development is located approximately 100m away from any sensitive receptor, and as such, there is sufficient separation distance between the proposed development, and the nearest sensitive property.
- 5.34. As stated above, the Applicant is currently in the process of obtaining land means power for the site, and any generators are to be used on the site will be temporary. That said, the generators that are to be used will run on low carbon diesel in order to reduce fumes emissions.
- 5.35. In terms of the confectionary stands that are to be located on site, the exact stands that are to be located on site cannot be determined at this stage – as they will change from season to season, however, as stated above, there is a significant, and acceptable, separation distance from the nearest residential property, and as such, there will be no adverse impact on the amenity of local occupiers.
- 5.36. Moreover, it should be noted that residential properties are commonly located above bakeries, restaurants etc, and there is an Indian restaurant located within approximately 20m of the residential properties located on the opposite side of The Princess Margaret Way.
- 5.37. In light of the above, it is considered that there will be no adverse impacts in regard to Air Quality arising from the proposed development, and as such, is acceptable accordingly.

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## Waste Management

- 5.38. Policy W3 (Waste Management in New Development) sets out that proposals for new built development will need to demonstrate that provision is made for the waste generated by the development.
- 5.39. It should first be noted that the proposed development by its very nature, does not constitute operational development, and as such, given that Policy W3 relates to 'new built development', this policy is not directly relating to the proposed development.
- 5.40. That said, the proposed development proposes the incorporation of 10no. bins associated with the proposed fairground, and 2no. bins located directly adjacent to the proposed Ferris Wheel. Any waste that is generated by the proposed development will be collected by a reputable waste management company, and will be disposed of accordingly.

- 5.41. In light of the above, it is considered that the proposed waste management arrangements are acceptable, and comply with Policy W3 (Waste Management in New Development) accordingly.

## Other Material Considerations

### *Flood Risk*

- 5.42. A search of Natural Resource Wales Flood Risk Map shows that a small proportion of the site is located within an area at low risk of flooding from surface water and small watercourses. An extract of NRW's Flood Risk Map can be found below for reference.

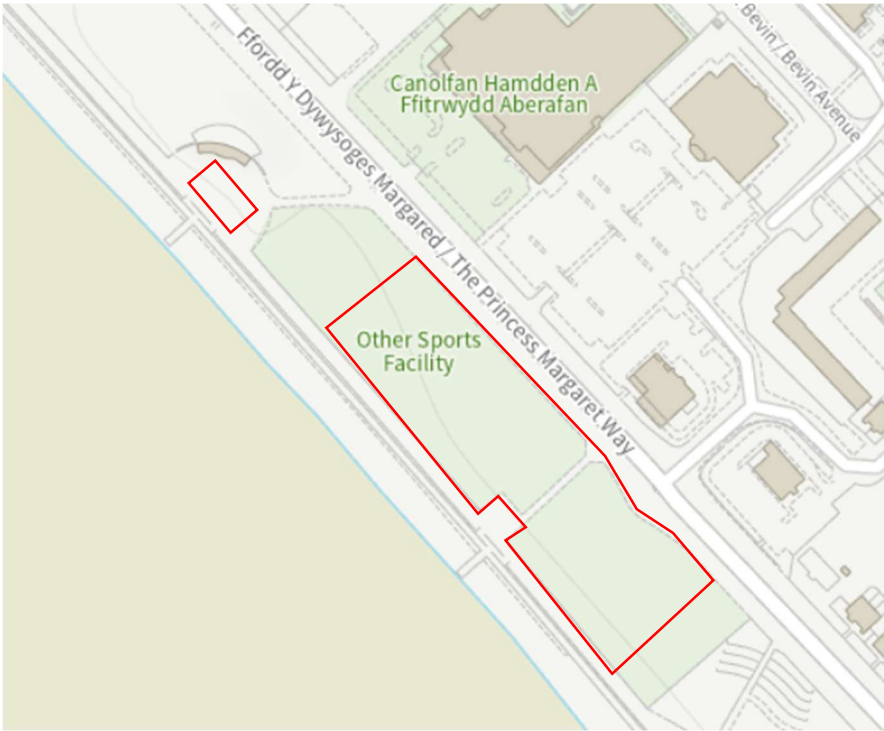


*NRW Flood Risk Map Extract (site circled in red)*

| Key                     |        |                                                    |        |
|-------------------------|--------|----------------------------------------------------|--------|
| Flood Risk from the Sea |        | Flood Risk from Surface Water & Small Watercourses |        |
|                         | High   |                                                    | High   |
|                         | Medium |                                                    | Medium |
|                         | Low    |                                                    | Low    |

Heritage

5.43. A search of the below Historic Wales Map shows the site is not constrained by any heritage features.



Historic Wales Map (site circled in red)

Public Rights of Way

5.44. In terms of Public Rights of Way, a review of the Public Rights of Way Map demonstrates that two footways pass through the site, and that the site is located directly adjacent to a cycle way. An extract of the PRoW map can be found overleaf for reference.



Public Rights of Way Map Extract (approximate site area highlighted in red)

| Key |                          |
|-----|--------------------------|
|     | Footway / Multi-use path |
|     | Cycleway                 |

- 
- 5.45. Whilst it is acknowledged that there are two footways that pass through the site, given the nature of the development (a funfair) the site will be readily accessible, and the site will be traversable. As such, PRow are not considered to be a fundamental constraint to development.
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## 6. Summary and Conclusions

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### Summary

- 6.1. The application proposals are considered to accord with planning policies at both the national and local level. In particular, it is considered that there are a number of material consideration in support of the application, which include the following:
- The principle of development in this location is in accordance with national and local policy;
  - The proposed development consists of a sympathetic addition to Aberavon beachfront, that is considered to maintain the relative relationship between promenade and the wider surroundings;
  - The proposed design ensures that the proposals represent a design commensurate of surrounding context of Aberavon beachfront and the special qualities and characteristics of the wider surrounding area have been responded to positively and protected, in order to not be harmful to the character of the local area;
  - The proposals are considered to have no unacceptable impact on highway safety nor cause or exacerbate existing traffic congestion, heritage or Rights of Way;
  - The proposals will not result in an unacceptable level of noise generations;
  - The proposals incorporate appropriate waste management measures; and
  - The proposals will not negatively impact the ecology of biodiversity features on site, and is in accordance with Policies EN6 and EN7 accordingly.
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### Conclusion

- 6.2. Having regard to the above material considerations, it is considered that the proposed development represents an appropriate and policy compliant scheme.
- 6.3. Accordingly, it is therefore considered that the proposed development is acceptable, and we would respectfully request that the full application be approved.
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**GJP.**

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