



Margam Green Energy Plant Office and Site Entrance Development

Planning Statement

Prepared for

Margam Green Energy Ltd

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1.0 INTRODUCTION, BACKGROUND & SCOPE OF APPLICATION

1.1 Introduction

- 1.1.1 This Planning Statement (PS) has been prepared in support of a planning application made by Margam Green Energy Ltd ('the Applicant'). The application is for the construction and operation of a new office building and development at the site entrance to Margam Green Energy Plant (MGEP) ('the Proposed Development'). The MGEP is located off Harbour Way, Margam, Port Talbot. The Proposed Development is located on land adjacent to the southern border of the MGEP.
- 1.1.2 This document is the PS provided to accompany the application for full planning permission for the Proposed Development. The remainder of this section describes the scope of the planning application and summarises the planning history of MGEP. Section 2.0 describes the Proposed Development, Section 3.0 provides a brief summary of the environmental effects of the Proposed Development and Section 4.0 provides a planning appraisal of key relevant development plan policies and other material considerations. Finally, Section 5.0 provides conclusions in respect of the acceptability of the Proposed Development in planning terms.

1.2 Proposed Development

- 1.2.1 The Proposed Development comprises a two-storey office building, three two-storey contractor cabins, a two-storey security cabin, a fuel inspection gantry, a car park, a smoking shelter, site entrance gate and access barrier, landscaping proposals, drainage infrastructure and ancillary development. Drawing 4183-8330-0001 shows the proposed Site Layout, as well as elevations and cross sections.
- 1.2.2 The Proposed Development would be located on land within and adjacent to the southern boundary of the MGEP. The location of the Proposed Development is shown on Drawing 2774-04-01.
- 1.2.3 The MGEP facility generates renewable electricity by way of steam turbine driven through the combustion of treated waste wood that would otherwise be disposed of at landfill. The facility has been operational since 2019 and is capable of generating 40MW of renewable energy.
- 1.2.4 Further detail of the facility and the process that takes place at the Proposed Development is provided at Section 2.0 below.

1.3 Planning History of MGEP

- 1.3.1 The MGEP was originally approved on appeal (ref. APP/Y6930/A/10/2135473) in March 2011. A revised planning application was subsequently approved in October 2014 (ref. P2014/0705). This application was subsequently subject to an application under Section 73 of the Town and Country Planning Act 1990 (as amended), to not comply with conditions 14 and 17. The revised planning permission was granted in May 2016 (ref. P2016/0236). This effectively varied the planning permission in respect of air quality monitoring requirements and construction hours. A further Section 73 application (to not comply with Condition 16) was approved in February 2017 (ref: P2016/0949). This permission varied the approved drawings to accommodate minor material changes to the development. Construction of the MGEP was completed in June 2019.
- 1.3.2 A review of planning permission ref. P2016/0949 was undertaken in 2020, along with the associated schemes approved pursuant to the planning conditions attached to the permission. The review identified a number of conditions which: could no longer be complied with; contained erroneous references; or, were no longer relevant. Following discussions with the Council, an application was submitted pursuant to Section 73A of the Town and Country Planning Act 1990 to resolve these matters. Planning permission ref. P2020/0668 was granted in December 2020.
- 1.3.3 A separate series of planning permissions for foul and surface water mains and a telecommunications cable were granted between 2014 and 2017 (refs: P2014/0835, P2016/1070, P2017/0705 and P2014/0835).
- 1.3.4 In 2015, planning permission ref. 2015/0992 was granted for a Waste Wood Storage Building within the MGEP site. In 2016 an application (ref. P2016/1020) was approved for a series of Non-Material Amendments under Section 96a of The Town and Country Planning Act 1990 (as amended) to the design of the building approved under ref. P2015/0992.
- 1.3.5 Planning permission ref. P/2016/0895 was granted in January 2017 for the development of an administration building and associated car park at the MGEP. In 2020, planning permission ref. P2020/0671 was granted under Section 73 to amend the Landscape and Ecology Management Plan and Landscape Plan listed under the relevant planning conditions, to achieve consistency across the MGEP related permissions. In November 2022, planning permission ref. P2022/0971 was granted

under Section 73 to vary Condition 1 of planning permission ref. P2020/0671 to extend the permitted building, change the layout of the adjacent car park and to increase parking and remove the bin store.

- 1.3.6 In October 2020, planning permission ref. P2020/0613 was granted for the erection of a new equipment storage building and associated works at the location of the office building and contractor cabins now proposed. The equipment storage building subject of planning permission ref. P2020/0613 was not constructed. Planning permission ref. P2020/0613 remains 'live' until 07 October 2025.
- 1.3.7 In January 2023, planning permission ref. P2022/0972 was granted for development at the site entrance of the MGEP comprising a security hut, smoking shelter, security barrier system, changes to the kerb system, shallow retaining wall structures and signage at the site entrance. In September 2023, an application to discharge Condition 3 and Condition 4 of planning permission ref. P2022/0972 was approved at the Site however construction of the development has not commenced.
- 1.3.8 The Proposed Development is situated on the sites of planning permission refs: P2020/0613 (equipment storage building) and P2022/0972 (development at the site entrance), neither of which have been constructed. If planning permission were granted for the Proposed Development, the Proposed Development would be progressed instead of the proposals previously approved through planning permission refs: P2020/0613 and P2022/0972.

1.4 The Site Context

- 1.4.1 The Proposed Development would be located on land within and adjacent to the southern boundary of the MGEP. The location of the Proposed Development is shown on Drawing 2774-04-01.
- 1.4.2 MGEP is located off Harbour Way, Margam, Port Talbot, approximately 300m to the west of the A48, which runs northwards into Margam alongside the M4 from junction 38. To the south of the consented MGEP is an area of wet woodland. To the west, beyond the consented MGEP, lies an extended area of marshy grassland and dense scrub and woodland. A major drainage watercourse called the Upper Mother Ditch is also located to the west. The edge of the urban area of Margam is located to the north of the MGEP.

- 1.4.3 The wider development area is set within an industrialised landscape with another Biomass Plant (which became operational in March 2008) and the British Oxygen Co (BOC) located beyond the wet woodland to the south. The London to Swansea railway line is situated 500m to the west, with the steelworks immediately beyond that to the west and stretching to the north-west.

1.5 Scope of the Planning Application

- 1.5.1 The planning application comprises the following main elements:

- Application Form;
- Drawings;
 - Drawing 2774-04-01 Location Plan
 - 4183-8310-0001DW Proposed Site Entrance R4
 - 4183-8320-0001DW Proposed Gate House R3
 - 4183-8330-0001DW Proposed Site Elevations R2
 - 4183-8600-0001DW Post Development Ground Levels R1
 - 4183-8330-0005DW Smoking Shelter R1
 - 4183-8330-0004DW Sampling Gantry R1
 - 4183-8330-0003DW Contractor Cabins R1
 - 4183-8330-0002DW Site Office Elevations R1
 - 2774-01-05 Rev E Landscape Plan
- Flood Consequences Assessment and Drainage Statement (Appendix A);
- Coal Mining Risk Assessment (Appendix B);
- Ecology Technical Note (Appendix C); and
- Statutory Planning Application Fee.

2.0 SCHEME DESCRIPTION

2.1 Introduction

2.1.1 This Chapter of the PS provides a description of the Proposed Development.

2.2 The Proposed Development

2.2.1 The Proposed Development comprises a two-storey office building, three two-storey contractor cabins, a two-storey security cabin, a fuel inspection gantry, a car park, a smoking shelter, site entrance gate and access barrier, landscaping proposals, drainage infrastructure and ancillary development.

2.2.2 The dimensions for the office building are 18m x 10m with a height of 5.2m.

2.2.3 Three contractor cabins are proposed. Each cabin is two storeys, with a height of 5.2m and 12m long x 2m wide.

2.2.4 The dimensions for the security cabin are 7m x 7m with a height of 6m and the dimensions for the fuel inspection gantry are 16.5m x 2.5m with a height of 3.5m.

2.2.5 In total, the proposal seeks to create an additional 602 sqm of floorspace.

2.2.6 The Site varies in level, sloping down towards the west from approximately 8m above ordnance datum (AOD) where the security barriers, security cabin and fuel inspection gantry are located, to approximately 7m AOD where the contractor cabins, office building and car park are located.

2.2.7 The office building, security cabin and contractor cabins have been designed to reflect the appearance of the main MGEP building. The building panels would be coloured light grey with a dark blue surround, as per the main MGEP building. The smoking shelter would comprise a steel frame with translucent plastic sheets.

2.2.8 Car parking would be provided to the east of the proposed office building. This area would provide 10 car parking spaces, 2 of which would be fitted with EV charging points.

2.2.9 A new drainage scheme would be provided to serve the Proposed Development and is described below.

- 2.2.10 The office would provide capacity for six staff members, and would include a large meeting space to accommodate up to approximately 20 visitors, when required. The office is to be constructed for the use by existing staff members, but it would also enable the Applicant to employ a further two employees, if required. All members of staff to occupy the new office building would be full-time employees.
- 2.2.11 The contractor cabins would provide office and welfare facilities for contractors as and when required.
- 2.2.12 The fuel inspection gantry would enable the fuel being delivered to the MGEP to be weighed and inspected prior to it entering the MGEP site.
- 2.2.13 The security cabin and security barrier system is required to provide a permanent and robust site security arrangement which avoids the need for security personnel to go into the roadway to manually re-position cones to permit access to the Site. The proposed barrier system would be fitted with an Automatic Number Plate Recognition system (ANPR) connected to a data base of staff vehicle registration plates to allow staff vehicles automatic free access to the site, whilst preventing free access to others.

Drainage Scheme

- 2.2.14 A drainage scheme has been prepared for the Proposed Development, as presented in Appendix A Flood Consequence Assessment and Drainage Statement.
- 2.2.15 The Site does not appear to be positively drained other than the hardstanding area to the site entrance. As such, surface water runoff from the remaining areas is expected to infiltrate where conditions allow and flow overland in a direction determined by topography, towards the drainage ditch along the southern boundary.
- 2.2.16 The Site has a total area of 0.275 ha, of which 0.15 ha will consist of new impermeable areas to be positively drained. Areas outside of this are expected to continue to drain as existing. The areas to be positively drained will be disposed of into the drainage ditch located along the southern boundary, and will be restricted to 1.3 l/s in up to the 1.0% AEP storm event including a 30% climate change allowance.
- 2.2.17 The Proposed Development will include attenuation storage within the pipe network and a geo-cellular storage tank to be located below the access into the MGEP (as shown on the proposed surface water drainage layout provided in Appendix F of the

Flood Consequence Assessment and Drainage Statement (FCADS) accompanying this planning application).

- 2.2.18 Permeable paving will be used within parking bays and a gravel surface will be utilised adjacent to the office building and contractor cabins, to provide surface water treatment.
- 2.2.19 In addition, a bypass separator, catchpit manholes and silt traps in channels drains will also help prevent contaminants discharging into the downstream receptor.
- 2.2.20 Foul loading from the proposed office building would be nominal and would be accommodated in the existing foul water drainage network serving the wider site.

Landscaping

- 2.2.21 Landscaping is proposed as shown on Drawing 2774-01-05 Rev E Landscape Plan. The proposals include trees, a reptile hibernacula and reptile bank, species rich grassland and raised planters. The landscaping proposals are primarily aimed at providing habitat creation and would also provide an enhanced environment for those working at the Site.

2.3 Environmental Impact Assessment

- 2.3.1 The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (as amended) (hereafter referred to as 'the EIA Regulations') prescribe the types of development for which EIA is mandatory (Schedule 1 development) and others which may require assessment if they are likely to give rise to significant environmental impacts (Schedule 2 development).
- 2.3.2 The Proposed Development does not fall under any of the development types listed in Schedule 1 of the EIA Regulations and is therefore not Schedule 1 development. Due to the area of the Proposed Development Site (0.28 ha), the development does not fall within any of the main development categories within Schedule 2 of the Regulations. However, the development does form a 'change or extension' to the MGEP and as such, the Proposed Development is captured by Paragraph 13 of Schedule 2.
- 2.3.3 The applicable threshold and criteria for Paragraph 13 is that the '*development as changed or extended may have significant adverse effects on the environment*'.

2.3.4 In considering the potential significant adverse effects, either alone or in combination with the operation of the existing plant, the following points are considered relevant:

- The Proposed Development is not located in a 'sensitive area' in terms of the EIA Regulations.
- The Proposed Development would not alter the operation of the facility and as such would have no impact on the emissions from the main plant in terms of air, noise or water either alone or in combination with the main plant.
- The Proposed Development is significantly smaller than the main MGEP and has been designed to fit with the existing development, with regards to both scale and appearance. As such, the Proposed Development would not have any significant adverse landscape or visual impacts.

2.3.5 On the basis of the low sensitivity of the Site from an environmental perspective, the scale of the Proposed Development, and the lack of any adverse in-combination effects with the main facility, it is considered that the development would not give rise to any significant environmental effects. As such, it would not constitute EIA development.

3.0 SUMMARY OF ENVIRONMENTAL EFFECTS

3.1 Introduction

- 3.1.1 A Flood Consequence Assessment and Drainage Statement (FCADS), a Coal Mining Risk Assessment and an Ecology Technical Note have been completed to support this planning application. These are contained in Appendices A – C, respectively. A summary of the findings of these reports are provided under the following sub-headings.

3.2 Flood Consequences Assessment

- 3.2.1 A Flood Consequence Assessment is provided in the FCADS at Appendix A.
- 3.2.2 The Flood Map for Planning - Rivers and Sea indicates the site to be located in Flood Zone 1, with a small area in the west in Flood Zone 2 (rivers).
- 3.2.3 The FCA confirms that there are no records of flooding at or within the immediate vicinity of the Site and concludes that the risk of flooding to the Proposed Development is assessed to be negligible / low with the exception of the Afon Cynffig and Ty Du Brook, which may pose a risk in the western extent of the Site during a 0.1% AEP fluvially dominated event. No built development is proposed within the area of identified risk, as this area will be utilised for landscape and ecological management.
- 3.2.4 Ground levels within the proposed developable area of the site will be set at a minimum of 7.0 m AOD, which is 2.14 m above the flood level indicated in the west of the site during a 0.1% AEP fluvially dominated event. In addition, the finished floor level of the two-storey office will be at least 0.15 m above adjacent ground levels, with ground levels sloping down from the building.
- 3.2.5 The FCA confirms the proposals would not be expected to have an adverse impact on flood risk elsewhere.
- 3.2.6 The FCA concludes that the Proposed Development would comply with TAN 15.

3.3 Drainage

- 3.3.1 A Drainage Statement has been prepared and is also provided in the FCADS at Appendix A, and this includes the proposed Surface Water Drainage Scheme which

would adopt a sustainable drainage system (SuDS). The proposed SuDS comprises attenuation storage within the pipe network, a geo-cellular storage tank, permeable paving within parking bays and gravelled surfaces adjacent to the office and contractor cabins. In addition to aiding runoff rates at the Site, the use of permeable paving and gravel surfaces will also enhance water quality treatment.

- 3.3.2 A bypass separator, catchpit manholes and silt traps in channels drains will also be used to prevent contaminants discharging into the downstream receptor, further enhancing water quality treatment.
- 3.3.3 The Drainage Statement concluded that to achieve a peak discharge rate of 1.3l/s, a total storage volume of 80.2m³ would be required. The geo-cellular storage tank will provide approximately 72m³ of attenuation storage, with the remaining storage provided within the pipe network. These features will provide adequate storage for a 1 in 100 year storm event plus a 30% allowance for climate change.
- 3.3.4 The Drainage Statement concludes that the Proposed Development is in accordance with the requirements of local and national planning policy.

3.4 Coal Mining Risk Assessment

- 3.4.1 The Site lies within a 'Development High Risk Area' as defined by the Coal Authority. As such a Coal Mining Risk Assessment accompanies this application (Appendix B). The report concludes that the risk to development on the site from abandoned shallow mine workings is negligible.

3.5 Ecology

- 3.5.1 An Ecological Technical Note has been prepared, and is provided at Appendix C.
- 3.5.2 This note provides ecological context for the Site in terms of designated ecological sites, habitats and protected species. The note also considers the potential impacts of the proposed development on these features and demonstrates how the stepwise approach to securing a net benefit for biodiversity has been applied.
- 3.5.3 The Site is subject of an approved Landscape Ecological Management Plan (LEMP) (BSG Ecology 2020). The Ecological Technical Note concludes that although the extent of habitat provided as part of the Proposed Development is less than previously committed to in the LEMP, the solution proposed to achieve Biodiversity Net Benefit would increase the Site's biodiversity and condition. Therefore

ecosystem resilience of the Site would be improved beyond its current baseline condition and what was proposed within the currently approved LEMP.

4.0 PLANNING POLICY ASSESSMENT

4.1 Introduction

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require applications to be determined against the policies of the Development Plan unless material considerations indicate otherwise. This sets the statutory function of the Development Plan in the determination of applications for planning permission.

4.1.2 The Proposed Development is located within the administrative area of Neath Port Talbot County Borough Council. In the case of the Proposed Development, the statutory development plan comprises the following documents:

- Neath Port Talbot County Borough Council Local Development Plan 2011 to 2026 (adopted January 2016); and
- Neath Port Talbot County Borough Council Local Development Plan 2011 to 2026 Proposals Map.

4.1.3 In addition to the most relevant policies of the statutory development plan, the proposal has also been considered in the context of other material planning considerations. Those most relevant to the Proposed Development are considered to be as follows:

- Future Wales - the National Plan 2040;
- Well-being of Future Generations (Wales) Act 2015;
- Planning Policy for Wales Edition 12; and
- Technical Advice Notes (TANs).

4.2 Appraisal

Neath Port Talbot County Borough Council Local Development Plan (2011-2026)

4.2.1 The policies of the Neath Port Talbot County Borough Council Local Development Plan (2011 – 2026) (LDP) considered to be most relevant to the determination of the planning application are as follows:

- Strategic Policy SP1 Climate Change

- Strategic Policy SP15 Biodiversity and Geodiversity
- Policy EN7 Important Natural Features
- Policy EN8 Pollution and Land Stability
- Policy BE1 Design
- Strategic Policy SP18 Renewable and Low Carbon Energy

Strategic Policy SP1 Climate Change

- 4.2.2 Strategic Policy SP1 sets out the Council's overarching policy towards climate change. The causes and consequences of climate change are set out within the policy. With regard to flood risk, the policy states:

"1. Likely increased flood risk will be taken into account and addressed by ensuring that there is greater resilience by avoiding development on land that is at risk from flooding in the first instance in accordance with the sequential approach set out in national guidance or in locations that could increase the risk of flooding elsewhere;"

- 4.2.3 As identified in the Flood Consequences Assessment (Appendix A), the risk of flooding to the Proposed Development has been assessed and found to be negligible / low with the exception of the Afon Cynffig and Ty Du Brook. No built development is proposed within the area of identified risk, and no flooding issues have been identified at the MEGP plant since it was constructed.
- 4.2.4 With regard to increasing flood risk elsewhere, the FCADS (Appendix A) confirms that the proposals would not be expected to have an adverse impact on flood risk elsewhere.
- 4.2.5 In light of the above, the Proposed Development would not be located on land at risk from flooding and would not increase the risk of flooding elsewhere. The proposal is therefore considered in accordance with Strategic Policy SP1.
- 4.2.6 In addition, the Proposed Development supports the efficient operation of the MEGP which has a renewable energy generating capacity of 40MW. On this basis, the Proposed Development is considered to contribute to achieving Strategic Policy SP1.

Biodiversity and Geodiversity

- 4.2.7 Strategic Policy SP15 Biodiversity and Geodiversity sets out the Council's overarching policy towards protecting, conserving, enhancing and managing biodiversity and geodiversity and ensures that biodiversity is fully taken into account in all planning decisions.
- 4.2.8 Policy EN7 Important Natural Features seeks to protect and enhance ecologically or visually important natural features. The Proposed Development is located on brownfield land and therefore no important natural features will be adversely impacted.
- 4.2.9 The Proposed Development will provide ecological enhancements, achieved through landscaping measures shown on Drawing 2774-01-05 Rev E. There is currently an approved LEMP covering the full extent of the MGEP site and the landscaping proposals complement the landscape and ecological features already approved and implemented.
- 4.2.10 An Ecology Technical Note accompanies the planning application (Appendix C) and confirms how the Proposed Development would achieve an improvement in the ecological resilience of the Site.
- 4.2.11 The Proposed Development is in accordance with Strategic Policy SP15 and Policy EN7.

Policy EN8 Pollution and Land Stability

- 4.2.12 Policy EN8 sets out the Council's policy with regard to Pollution and Land Stability. Policy EN8 states that proposals which will have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to, in particular, matters of air pollution, light pollution and water pollution will not be permitted.
- 4.2.13 The nature of the Proposed Development is such that there would be no change in respect of air quality, contamination, water & ground water quality or effects on human health, such as adverse noise impacts.
- 4.2.14 With regard to land instability, a Coal Mining Risk Assessment (Appendix B) accompanies this application which concludes that the risk to the Site from abandoned shallow mine workings is negligible.

4.2.15 No external lighting is proposed on the office or contractor cabin buildings. Lighting at the site entrance would be as per current levels. Therefore, the Proposed Development would not result in any additional impacts resulting from lighting.

4.2.16 Consequently, it is considered that there would be no conflict with Policy EN8.

Policy BE1 Design

4.2.17 Policy BE1 expects all development proposals to “*demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive and sustainable places*”.

4.2.18 The policy sets out a number of criteria and stipulates that proposals will only be permitted where they satisfy all of the relevant criteria. With the exception of Criteria 7, all of the criteria set out under Policy BE1 are considered relevant to the Proposed Development and these are discussed below.

4.2.19 The Proposed Development will be in-keep with the existing buildings on-site and will not influence the perceived scale or massing of the overall development. The Proposed Development is of a much smaller scale when considered against the backdrop of the MGEP as a whole and therefore, there will be little change with regard to the view of the plant within the local landscape. The Proposed Development is in accordance with Criterion 1 and Criterion 2.

4.2.20 The proposed buildings have been designed to reflect the appearance of the main MGEP building. As stated in Section 2.0, the building panels would be coloured light grey with a dark blue surround to reflect the main MGEP building and as stated above, the Proposed Development would provide ecological enhancements. As such, the Proposed Development is in accordance with Criterion 3 and Criterion 5.

4.2.21 The Proposed Development would not result in a material increase in the number of workers at the MGEP and would not result in any additional HGVs accessing the site. The Proposed Development would therefore not result in any adverse impact on highway safety and is in accordance with Criterion 4.

4.2.22 The addition of a security barrier and security cabin would provide the Site with permanent and robust security system whilst also removing the need for staff to enter the roadway to manually re-position cones to permit access to the Site, subsequently

increasing the safety at the Site. The Proposed Development is in accordance with Criterion 6.

- 4.2.23 The Proposed Development complies with Criterion 8 by virtue of being located within the existing fence line of the MGEP and given it would not preclude development proceeding on any of the land allocated for development within the Local Development Plan.
- 4.2.24 The Surface Water Drainage Design is provided within Appendix A. The design demonstrates that the proposed drainage system limits flood risk and surface water runoff such that the Proposed Development is in accordance with Criterion 9.
- 4.2.25 The Proposed Development incorporates hand railed ramp access into the office building and contractor cabins as well as dropped kerbs, thus facilitating use of the buildings to mobility impaired users. The Proposed Development is in accordance with Criterion 10.
- 4.2.26 The above demonstrates that the Proposed Development constitutes high-quality design and is therefore considered to be consistent with the aims of Policy BE1.

National Development Framework: Future Wales – The National Plan 2040

- 4.2.27 The National Development Framework: Future Wales – the National Plan 2040 (Future Wales) was published on 24th February 2021. Future Wales sets out the Welsh Government's strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of Welsh communities.
- 4.2.28 Policy 8 of Future Wales is of key relevance in terms of managing flood risk. The policy directs development away from areas at risk of flooding and requires proposals to not cause unacceptable impacts on the surrounding natural environment. As stated in Section 3.0 of this PS, the drainage scheme for the Proposed Development comprises attenuation storage, permeable paving and gravelled surfaces to help control the flow of surface water runoff, subsequently reducing flood risk at the Site. The proposal also includes a bypass separator, catchpit manholes and silt traps in channel drains which, in addition to permeable paving and gravelled surfaces, will help prevent contaminants discharging into the downstream receptor such that the Proposed Development would not cause unacceptable impacts on the surrounding

natural environment. The Proposed Development is therefore supported by Policy 8 of Future Wales.

- 4.2.29 Policy 9 of Future Wales is of key relevance to the resilience of ecosystems, enhancement of biodiversity and the provision of green infrastructure. The Welsh Government is committed to reversing the decline in biodiversity and increasing the resilience of Welsh ecosystems. The Proposed Development would provide ecological enhancements and would not impact the locally important wet woodland habitat located to the south and west of the MGEP. The Proposed Development is therefore supported by Policy 9 of Future Wales.

Planning Policy Wales Edition 12

- 4.2.30 Planning Policy Wales Edition 12 (PPW) sets out the land use planning policies of the Welsh Government. The PPW is supported by Technical Advice Notes (TANs), Minerals Technical Advice Notes (MTANs) and policy clarification letters.
- 4.2.31 Paragraph 1.2 sets out that its primary objective is *“to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, and environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act and other key legislation.”*
- 4.2.32 Paragraph 1.8 states that: *“Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated”.*
- 4.2.33 The importance of good design is highlighted at Paragraph 3.3 where it is stated that *“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.”*
- 4.2.34 As set out above, the Proposed Development constitutes high-quality design and is therefore consistent with the aims of PPW, with regards to good design.
- 4.2.35 With regards to flood risk, PPW sets out that the planning system should ensure sustainable drainage systems are an integral part of design approaches for new

development (Paragraph 6.6.5), and that development should reduce, and must not increase, flood risk (Paragraph 6.6.25).

- 4.2.36 A Flood Consequences Assessment and Drainage Statement have been prepared in support of the Proposed Development. The FCADS sets out a sustainable drainage system for the Proposed Development and confirms that the proposal is not expected to have an adverse impact on flood risk at the Site or elsewhere. As such, the Proposed Development is in accordance with PPW.
- 4.2.37 A key theme of PPW is producing Productive and Enterprising Places (PEP), which are defined as those which promote Wales' economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. For planning purposes, PPW defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and income. One of the core policy principles covered by the PEP theme is to encourage proposals which promote low carbon developments and sites for renewable energy, manufacturing, and research and development close to areas of deployment of renewable energy.
- 4.2.38 In addition, Paragraph 5.7.1 acknowledges that the planning system plays a key role in delivering clean growth and the decarbonisation of energy, in addition to building resilience to the impacts of climate change.
- 4.2.39 The Proposed Development is located within the boundary of, and would help support the security and operation of, the MGEP which utilises waste wood for the production of renewable energy. As such, the Proposed Development helps to achieve some of the key principles set out under the PEP theme.
- 4.2.40 Accordingly, the development is considered to contribute towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

Technical Advice Notes

- 4.2.41 Technical Advice Notes (TANs) support PPW and provide guidance on how national planning policies should be applied at the local level.
- 4.2.42 TANs considered relevant to the Proposed Development are as follows:

- TAN 12: Design;
- TAN 15: Development and Flood Risk; and
- TAN 23: Economic Development.

4.2.43 The TANs have been considered and the Proposed Development is considered to align with the principles contained within them.

4.3 Conclusions

4.3.1 The Proposed Development has been assessed against the relevant planning policies at both local and national levels. The policy appraisal has concluded that the Proposed Development aligns with the development plan and broader national policy frameworks, demonstrating compliance with key strategic policies related to climate change resilience and flood risk, biodiversity protection, design quality, and economic development.

5.0 CONCLUSION

- 5.1.1 The Proposed Development comprises a two-storey office building, three two-storey contractor cabins, a two-storey security cabin, a fuel inspection gantry, a car park, a smoking shelter, site entrance gate and access barrier, landscaping proposals, drainage infrastructure and ancillary development. The Proposed Development is located within the MGEP off Harbour Way, Margam, Port Talbot.
- 5.1.2 The Proposed Development has been designed to complement the main MGEP in terms of function and form. Building materials would match the main plant and the proposed buildings would not alter the overall scale and massing of the MGEP complex. The Proposed Development would replace development proposals at the Site which have been previously granted planning permission (planning permission refs: P2020/0613 and P2022/0972).
- 5.1.3 The Proposed Development would improve site safety and function.
- 5.1.4 The potential environmental effects of the Proposed Development have been considered, and no unacceptable adverse environmental effects have been identified.
- 5.1.5 The Proposed Development has been appraised in the context of the Statutory Development Plan and relevant material policy considerations. This process has demonstrated that the Proposed Development is either in conformity with, or supported by, all facets of the identified relevant planning policy context when considered individually and as a whole.
- 5.1.6 Accordingly, we would kindly request that planning permission for the Proposed Development is granted without delay.