Superseded

CARNEYSWEENEY

Date: 04th August 2025
Our Ref: CSC1159

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Neath Port Talbot County Borough Council
Development Control Section
The Quays
Brunel Way
Neath
SA11 2HZ

Planning Portal Reference: PP-14215172

Dear Sir/Madam,

APPLICATION ON BEHALF OF MOTOR FUEL GROUP
MORRISONS, CHRISTCHURCH ROAD, BAGLAN INDUSTRIAL PARK, PORT TALBOT, SA12 7DA

On behalf of our client, Motor Fuel Group (MFG), please find enclosed a planning application for the proposed extension to the existing petrol filling station's sales building, and associated works at Morrisons, Christchurch Road, Baglan Industrial Park, Port Talbot, SA12 7DA.

The following documents are submitted in support of this application:

- Completed Application Form
- Planning Supporting Letter (this document)
- Green Infrastructure Statement
- Application drawings comprising:
    - Baglan - 14314 - 2096 - BP - Block Plan
    - Baglan - 14314 - 2096 - LP - Location Plan
    - Baglan - 14314 - 2096 - 200 - Existing Site Layout
    - Baglan - 14314 - 2096 – 201 A - Proposed Site Layout
    - Baglan - 14314 - 2096 - 201-1 - Proposed Tracking Plan
    - Baglan - 14314 - 2096 - 202 - Existing Sales Building
    - Baglan - 14314 - 2096 - 203 - Existing Sales Building Elevations
    - Baglan - 14314 - 2096 - 204 - Proposed Sales Building
    - Baglan - 14314 - 2096 - 204-1 - Proposed HVAC Layout
    - Baglan - 14314 - 2096 - 205 - Proposed Sales Building Elevations

Supporting Information

This application follows the previous approval under reference P2024/0699 dated 20th June 2025 for the for the following description of development:

Proposed extension to existing petrol filling station sales building, removal of existing jet wash facilities to replace with 4 No. jet wash bays with canopy and plant room, creation of an EV charging zone with EV chargers, EV canopy, substation enclosure, meter cabinet, LV panel and associated works.

Following confirmation of the operator of the extension, this application now seeks permission for the extension to be occupied by Burger King.

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The schedule of areas (sqm) of the sales building are shown in the table below:

	Existing	Proposed Extension	Total
Gross External Area	66 sqm	84 sqm	150 sqm
Gross Internal Area	56 sqm	82 sqm	138 sqm

Planning Policy Context

The adopted development plan comprises the Local Development Plan (2011-2026). The adopted policies map identifies that the site is located outside of the town centre boundary.

Development Plan

The following policies are of most relevance to this proposal:

- Policy SP3 – Sustainable Communities
- Policy SC1 – Settlement Limits
- Policy SP12 – Retail
- Policy R3 – Out of Centre Retail Proposals

Rational for the Proposal

MFG is the UK's largest independent forecourt operator with over 900 sites offering a dual-fuel strategy, convenient retail and 'food to go'. As part of MFG's proposals to upgrade facilities across their portfolio of Morrison petrol filling stations they are also taking the opportunity to extend the existing kiosk/shop, to provide an improved offer to visiting motorists.

Key Considerations

The development plan establishes Neath as a Town in the settlement hierarchy which is a regionally important settlement providing the widest and most diverse range of functions, accessible by a range of transport options. In this case the site is located outside of the town centre boundary but within the settlement limit of Neath and forms part of the existing Morrison Petrol filling station offering. The principle of the extension has been established under permission reference P2024/0699. Policy SC1 identifies support for development which is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy.

The National Planning Policy Framework (2024) indicates that significant weight should be places on the need to support economic growth and wider opportunities for development at Paragraph 85. The proposals will enhance the existing offer at the site, without compromising the efficient operation of the facility.

The proposed development would be located within the existing Morrisons development area, within an existing employment area, situated away from residential dwellings. Therefore, it is not considered that the proposed extension, structures and uses would have an adverse impact on residential amenities. The proposed area will be well-lit and does not raise any concerns from anti-social behaviour / natural surveillance perspective.

The site is located off a private road accessed from Christchurch Road via a Roundabout to the south west. No changes are proposed to the existing site access. It is not expected that the proposed development will cause any increase in traffic on the surrounding highway network, due to the ancillary nature of the retail offering and expected use of the site by the passing motorist. Existing car parking spaces associated with the sales kiosk are expected to be sufficient to meet the needs of the sales building and extension.

As part of MFG's proposals to upgrade facilities across their portfolio of Morrison petrol filling stations they are also taking the opportunity to knock down and rebuild the existing sales building, to provide an improved offer

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to visiting motorists. In terms of retail planning policies, the sequential and impact tests do not apply as the small kiosk offer is purely ancillary to the main use as a petrol filling station, which is not a 'main town centre use' (as defined in the National Planning Policy Framework) – petrol filling stations do not fall within the Class E(a) shop use, being listed in the Use Classes Order 1987 (as amended) as a sui generis use. There should therefore be no mandatory requirement to assess the impact of the larger sales building. In respect of the sequential test, again the land use is sui generis not a shop use, but in any event given any new proposed areas of the sales building is intended to provide an improved offer to customers using the petrol filling station, it is site specific and clearly could not be located on a separate site.

Notwithstanding the above, if an impact assessment was required by policy, then the Government's Planning Practice Guidance (PPG) is clear that impacts should be assessed on a like for like basis in respect of the particular retail sector (PPG ref. 2b-015-20190722), which here would mean the impact of the larger forecourt kiosk on the turnover of other petrol filling stations. However, retail policies in both the National Planning Policy Framework and development plan are concerned with protecting the vitality and viability of defined town centres, so given the kiosk is purely ancillary to the petrol filling station use and caters to passing motorists and is not a retail destination in its own right, a retail impact assessment is clearly not warranted. The PPG also says that impact tests should be undertaken in a proportionate and locally appropriate way (PPG ref. 2b-017-20190722), so again, given the new kiosk involves only a modest minor development to a small retail offer intended to serve customers of the PFS, an impact assessment is not necessary. Any small uplift in turnover the new sales building will bring will not be spending that would otherwise be spent in the town centre.

We trust that the application is in order and that it can be processed accordingly. Should you have any queries or wish to discuss the above please don't hesitate to contact us.

Yours faithfully,

Lucy Burton
Planner
CarneySweeney

Encl.