

ELRS, Port Talbot

Planning Statement

September 2025



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1. Introduction and Background

1.1. Background

This report is prepared by the Urbanists for Tilbury Douglas who is the appointed contractor on behalf of Neath Port Talbot County Borough Council. It is prepared to accompany the full planning application for the proposed refurbishment and reuse of the Former Education Library Resource Centre, Reginald Street, Port Talbot. It is proposed to refurbish the building for use as a Pre-16 Vocational Centre (Skills Hub). The centre will provide a wide range of vocational courses for Key Stage 4 students (aged 14-16) offering part time educational and training opportunities alongside their main school curriculum.

1.2. This Report

This document comprises the following;

- **Section two** describes the site in context and surrounding area, including its planning history;
- **Section three** describes the development proposal in more detail,
- **Section four** describes the legislative and planning policy context relevant to the proposed development;
- **Section five** sets out the findings of the pre-application consultation that occurred;
- **Section six** sets out the material considerations and provides an assessment of the proposals in planning policy terms;
- **Section seven** provides a summary and some conclusions based on the above.

1.3. The Application

The planning application comprises the following plans and reports:

- Existing and proposed elevations, floorplans, and roof plans;
- Existing and proposed site layout plans;
- Landscape Strategy plans;
- Drainage Strategy Plans;
- Access and Parking Plans;
- Design and Access Statement;

- Planning Statement;
- Green Infrastructure Statement;
- Transportation Statement;
- Outline Travel Plan;
- Ecology Assessment;
- Drainage Strategy (demonstrating approach to SAB);
- Arboriculture Assessment (including tree protection plan) ;
- Flood Consequences Assessment;
- Noise Assessment;
- Air Quality Assessment

2. The Development Site

2.1. Site Location

The development site is the former Education Library Resource Centre on Reginald Street, Port Talbot. The site is 0.4 hectares located within a residential area bounded by Villiers Street (north), Reginald Street (south), and adjacent to Velindre Community School to the east. The surrounding area is mainly terraced housing, with accessible street frontages offering excellent walkability and community integration potential.

The site is well connected with bus stops located on Cwmavon Road and between Villiers Street and Jersey Street. Port Talbot railway station is located approximately 950 metres from the site with Port Talbot Bus Station approximately 1.2 kilometres away.

As well as locally, the site is also strategically well connected with good access to wider highway networks such as the A4107, A48 and the M4 joining at Junction 40.

Figure 1: Existing Site Location (source: google earth)



Figure 2: Site Boundary



2.2. Site Description

The site contains a two storey building with an overall floor space of 2,080 sqm approx. The disused Victorian-era school building, formerly the Education Library and Resource Centre, on site has an external finish comprising pebble dash render with red-brick accents. The building layout includes an internal courtyard and pitched slate roofs, reflecting the Victorian aesthetic often used for educational buildings in that time period.

Figure 3: View from Reginald Street and from the Uplands



2.3. Planning History

This section sets out the planning history of relevance to the site and the proposed development. The following explores previous planning applications that were submitted for the site, followed by planning applications that were submitted for areas surrounding the site:

- P2008/0278 - New Galvanized fence extended above existing boundary wall to match 4m high ballstop fence opposite 30-36 Villiers Street

3. Development Proposal

The proposed development is for a Pre-16 Vocational Centre (Skills Hub) to be developed at the former Education Library Resource Centre (ELRS) on Reginald Street, Port Talbot. The centre will provide a wide range of vocational courses for Key Stage 4 students (aged 14-16) offering part time educational and training opportunities alongside their main school curriculum.

The facility will provide teaching and learning spaces for the following:

- Flexible Teaching / Training Rooms
- Engineering / Construction Skills Zone
- Creative Media, Retail
- Travel & Tourism, Careers and Esports
- Hairdressing, Beauty and Wellbeing
- Animal Care
- Child Care
- Kitchen and Cafe
- Offices
- Courtyard (Social Space)

The facility will also have a public-facing element in order to give the students real life experiences and interaction on the various courses that they will take. This is also an opportunity to integrate the community into the scheme in a meaningful way.

The proposal has been designed with net-zero principles in mind. The aim is for the reuse of the building to achieve BREEAM 'Excellent' status. The design incorporates public, private and semi-public spaces in a considered approach allowing for easy access and movement throughout the building.

Figure 4 & 5: Proposed Illustrative Visualisation (Source Jon James Studio Architecture)



4. Legislation and Planning Policy Context

The following legislation below sets out the material considerations for planning permission. This legislation is of particular importance in terms of ensuring sustainable development and managing the interests of both current and future generations.

4.1. Legislation

Town and Country Planning Act (1990)

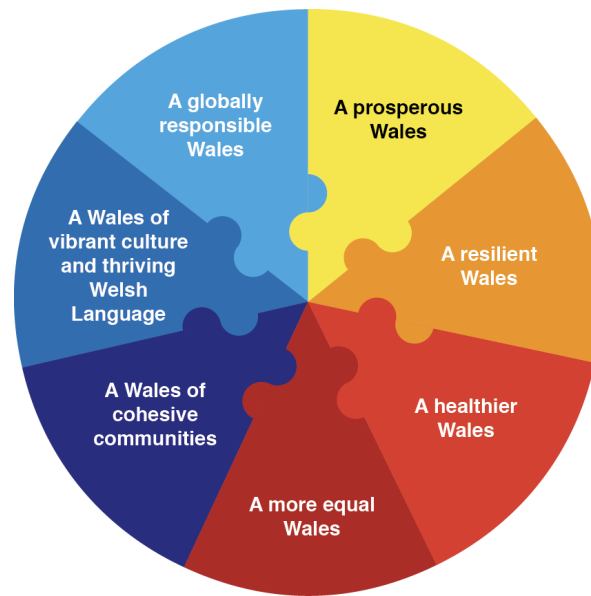
Under Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise. For Wales, the Development Plan includes the National Development Framework for Wales, any strategic development plan for an area that includes all or part of that area, and the local development plan for that area.

The Planning Act (Wales) (PWA) 2015 states that Local Planning Authorities must exercise their function in relation to the determination of planning applications “...as part of carrying out sustainable development in accordance with the Well-being of Future Generations (Wales) Act 2015 (annex 2), for the purpose of ensuring that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales.” (PA(W), Sec.2(2)).

Wellbeing of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act requires public bodies in Wales to consider the long-term impact of their decisions. The Future Generations Act defines Sustainable Development in Wales as: “The process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.” The Act identifies seven well-being goals; that are illustrated below. The Act makes it clear that the public bodies must work to achieve all of the goals, not just one or two. The Act also sets out five ways of working needed for public bodies to achieve the seven well-being goals. These include the fundamental requirement to balance short-term needs with the needs to safeguard the ability to also meet long-term needs.

Figure 6: Well being Goals



4.2. National Planning Policy

The key national planning policy that provides material context to the proposed development is comprised of:

- Planning Policy Wales (2024) Ed. 12
- Future Wales: The National Plan 2040

Collectively, these documents provide the guide to ensure the delivery of sustainable development proposals.

Planning Policy Wales (2024) Ed. 12

Planning Policy Wales (Edition 12) (PPW) is the Welsh Government's land use planning policy for Wales. The primary objective of PPW is to ensure the planning system contributes towards the delivery of sustainable development, and improves the social, economic, environmental and cultural well-being of current, and as required by the Wellbeing of Future Generations (Wales) Act, future generations. PPW identifies key planning principles to include: growing our economy in a sustainable manner; delivering educational facilities; creating healthy and accessible environments; creating and sustaining communities; and, maximising environmental protection and limiting impact.

PPW sets out the four key themes which contribute to placemaking:

Strategic and spatial choices, including how to achieve good design that enables access and inclusivity, environmental sustainability and respect for local character; and healthier places, including enabling opportunities for outdoor activity and recreation. Active and social places, including encouraging the multiple use of open space and facilities, where appropriate, to increase their effective use. Productive and enterprising places, including the promotion of healthy lifestyles, and physical and mental health and wellbeing; provision of integrated green infrastructure and resilience to climate change. Distinctive and natural places, including the need to conserve and enhance the historic environment and its assets; protecting and enhancing green infrastructure assets; protection and enhancement of biodiversity; protection of trees and woodland where they contribute towards the ecological, character or green infrastructure functionality of an area; and to integrate Sustainable Drainage Systems to minimise flood risk and maximise other benefits. The way these different principles, themes and targets integrate when considering planning proposals is summarised in Figure 5 below. The conclusion of this process should result in a proposal that contributes towards a sustainable place and achieving the Well-being Goals and National Sustainable Placemaking Outcomes that developments are expected to meet.

The updated chapter 6 has been initially set out in guidance, titled 'Addressing the nature emergency through the planning system:update to Chapter 6 of Planning Policy Wales. This has now been incorporated into the Edition 12 of PPW.

The main Chapter 6 changes to policy requirements are:

Green Infrastructure: A stronger emphasis would be placed on a proactive approach, covering cross-boundary considerations, identifying key outputs of green infrastructure assessments, the submission of proportionate green infrastructure statements with planning applications and signposting Building with Nature standards.

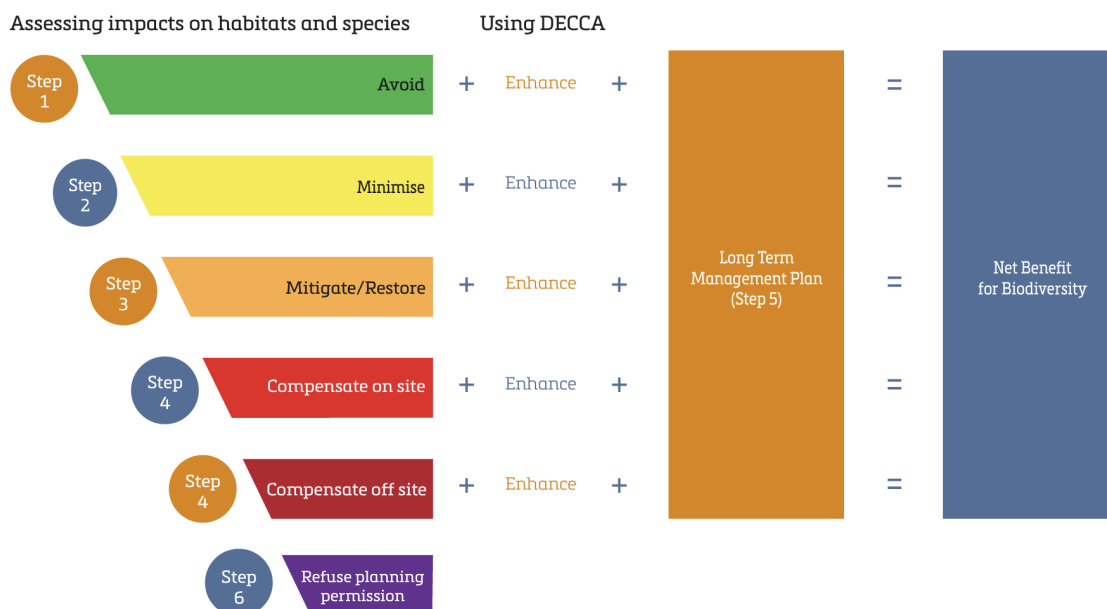
Net Benefit for Biodiversity and the Step-wide Approach (see Figure 6 below): Off-site compensation is acknowledged as a last resort, and the need to consider enhancement and long-term management at each step is recognised. Green infrastructure statements are set out as a requirement to demonstrate the 'step-wide approach' i.e. avoid, minimise, mitigate/restore, compensate on-site, compensate off-site. This links to the DECCA framework of ecosystem resilience to evidence adequate enhancements (Diversity, Extent, Condition, Connectivity and resultant Adaptation/resistance/recovery aspects). **Trees and Woodlands:** A close alignment is

taken with the step-wise approach, as well as promotion of new planting as part of development based on securing the right tree in the right place. For any trees that may be removed as part of a proposed development, consideration of their GI value including carbon, landscape amenity and ecological resilience sets a baseline from which a proportionate ratio of planting compensation shall be considered. Furthermore, the prescribed minimum ratio or areas of tree cover to compensate for any tree/woodland loss should be regarded.

Figure 7: Applying PPW principles in decision-making



Figure 8: Summary of the Step-Wise Approach



Future Wales: The National Plan 2040

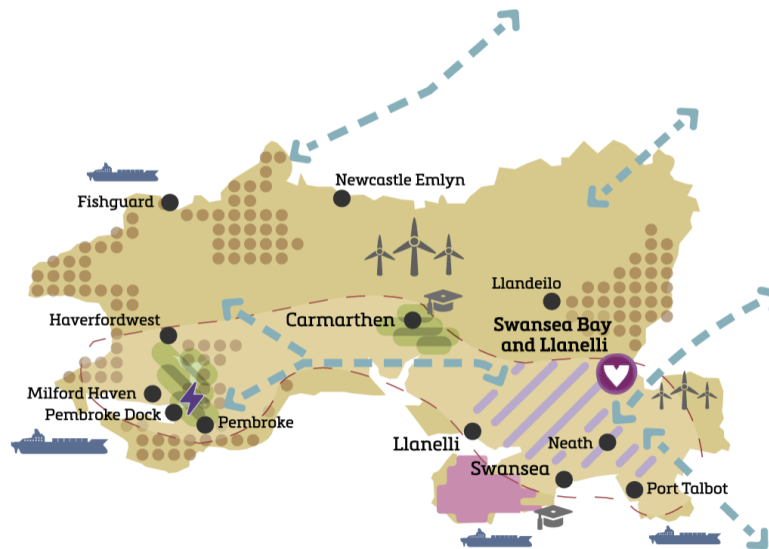
Future Wales: The National Plan 2040 was adopted in February 2021 as the national development framework setting the direction of development in Wales to 2040. The document is part of the development plan. The plan provides a strategy to address key national priorities through the planning system, including developing a vibrant economy, developing strong ecosystems, achieving decarbonisation and climate resilience and improving the health and wellbeing of communities.

The plan also sets out 11 Future Wales Outcomes, which forms the vision for Wales in 2040. The aim is for a Wales where people live:

- In connected, inclusive and healthy places;
- In vibrant rural places with access to homes, jobs and services;
- In distinctive regions that tackle health and socio-economic inequality through sustainable growth;
- In places with a thriving Welsh Language;
- In towns and cities which are a focus and springboard for sustainable growth;
- In places where prosperity, innovation and culture are promoted;
- In places where travel is sustainable;
- In places with world-class digital infrastructure;
- In places that sustainably manage their natural resources and reduce pollution;
- In places with biodiverse, resilient and connected ecosystems; and
- In places which are decarbonised and climate-resilient.

Future Wales divides Wales into 4 regions with Port Talbot falling within the South-West Region, as covered by the Regional Strategic Diagram below. It also shows that Port Talbot is included within the national growth area.

Figure 9: South-West Region Strategic Diagram (p.145)



Future Wales also provides a series of national policies (ch.4, Strategic and Spatial Choices), the following are pertinent to the proposed development:

Policy 1 (Where Wales will grow) identifies that South Wales is a key location for future growth and Policy 2 sets out the need to create spatial frameworks to achieve the placemaking aims of the Wales planning system.

Policy 2 (Shaping Urban Growth and Regeneration - Strategic Placemaking) also sets out the key Strategic Placemaking Principles: mixtures of uses; a variety of housing; walkable scales; increased densities in town and cities; integration with street networks; plot-based development; and green infrastructure.

Policy 3 (Shaping Urban Growth and Regeneration - Public Sector Leadership) sets out how the Welsh Government will play an active, enabling role to support the delivery of urban growth and regeneration. It details that the Welsh Government will assemble land, invest in infrastructure and prepare sites for development. Policy 3 explains how local authorities and other public sector bodies will work together to unlock the potential of their land and support them to take an increased development role.

Policy 9 (Resilient Ecological Networks and Green Infrastructure) explains the importance of identifying areas which should be safeguarded and created as ecological networks for their importance for adaption to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly

compromised by future development; and also the importance of identifying 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.

Policy 12 (Regional Connectivity) emphasises the importance of Active Travel and explains how planning authorities must plan the growth and regeneration of the National and Regional Growth Areas to maximise opportunities arising from the investment in public transport.

4.3. Technical Advice Notes

In addition to the above overarching development policies, a series of Technical Advice Notes (TANs) provide design guidance to development proposals. Technical Advice Notes should be read in conjunction with Planning Policy Wales (PPW) and are to be taken into account during the preparation of Development Plans. Those relevant to the development are identified below. These documents provide practical guidance that the development scheme will need to consider and apply as the design progresses.

TAN 5: Nature Conservation and Planning (2009)

This Technical Advice Note provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. The guidance states that biodiversity conservation and enhancement is an integral part of planning for sustainable development. The guidance advocates a collaborative approach where LPAs, developers and key stakeholders in conservation should work together to deliver sustainable development.

TAN 10: Tree preservation orders (1997)

TAN 10 advises in the interest of protecting trees and woodlands by making Tree Protection Orders (TPOs). The Act places a duty on local planning authorities to make adequate provision where appropriate for the preservation and planting of trees when granting planning permissions by imposing conditions and/or making TPOs.

TAN 11: Noise (1997)

This note provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the cost and administrative burdens of business. It outlines some of the main considerations which local planning authorities should take into account in drawing up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.

TAN 12: Design (2016)

This Technical Advice Note aims to equip all those that are involved in the design of the development with advice on how sustainability, through good design, may be facilitated through the planning system. It sets out the core design principles that any development proposal must follow to help create a sustainable environment and exhibit a high level of design quality. These are structured via the five key objectives of good design illustrated below.

Figure 10: Design Objectives



Technical Advice Note 15: Development, flooding and coastal erosion (2025)

This TAN provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. It also provides advice on the

consequences of the risks and adapting to and living with flood risk in relation to development and flooding. It replaces the previous 2004 advice.

The updated TAN refers to the Flood Map for Planning which identifies flood zones as below. It takes a risk-based approach, so that a locally appropriate approach can be taken during the development management process.

TAN 18: Transport (2007)

This TAN recognises that the integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. It states PPW and the Wales Transport Strategy both aim to secure the provision of transport infrastructure and services, which improve accessibility, build stronger economy, improve road safety and foster more sustainable communities. This includes integration of transport and land use planning.

TAN 24: Historic Environment (2017)

This note helps local authorities and developers understand how to consider the historic environment during the planning process. It provides advice on various aspects of the historic environment, including World Heritage Sites, archaeological remains, listed buildings, conservation areas and historic parks, gardens and landscape.

4.4. Local Policy

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

The Local Development Plan (LDP) is the statutory development plan for the County Borough and was adopted in 2016. It sets out the local planning policy framework against which development proposals are considered. It designates sites for protection and/ or enhancement and allocates sites for development, supported by written policies providing more detail on the nature of development that will be acceptable in the district. The policies considered relevant to the proposed development are identified below; these are the policies the development will need to satisfy in order to secure planning permission.

- SP1 - Climate Change
- SP3 - Sustainable Communities
- SP11 - Employment Growth

- SP15 - Biodiversity and Geodiversity
- SP16 - Environmental Protection
- SP18 - Renewable and Low Carbon Energy
- SP21 - Built Environment and Historic Heritage
- SC2 - Protection of Existing Community Facilities
- OS1 - Open Space Provision
- EN8 - Pollution and Land Stability
- TO4 - Walking and Cycling Routes
- TR2 - Design and Access of New Developments
- BE1 - Design
- RE2 - Renewable and Low Carbon Energy in New Development

Supplementary Planning Guidance

Supplementary Planning Guidance expands upon the policies outlined in the Local Development plan for key topics and or types of development. The most relevant are as follows:

- Planning Obligations
- Open Space and Greenspace
- Biodiversity and Geodiversity
- Pollution
- Renewable and Low Carbon Energy
- Parking Standards
- Design
- The Historic Environment
- Development and the Welsh Language

5. Pre-application Consultation

The pre-application stage including the following:

1. Informal NPTC/Design Team site visit;
2. Submission of request for Pre-Application advice; and,
3. Community engagement events.

An informal site visit was held between NPTC and the Design Team (03/07/25). The team walked the site and inspected parts of the existing building in the context of the initial development options. The proposed development approach was supported and agreed in principle with key issues to consider including: access, green infrastructure, and external treatment/appearance. It was agreed that the approach to the external cladding treatment would improve the appearance of the existing elevations although it was important to ensure that the key existing architectural features remain visible (window surrounds, air vents etc.). This is evidenced in the proposed elevations and Design and Access Statement.

A request for Non-Statutory Pre-Application Advice was submitted to Neath Port Talbot Council. The submission included: draft site plans; illustrative sketch elevations; draft proposed floor plans; Design and Planning Reports; plus summaries of drainage, flood risk, and transportation/access.

A response is awaited and any changes that it may recommend to the scheme will be considered at the time.

A community engagement exhibition took place at the Port Talbot Ynys Bowling Club on 25/09/25 during late afternoon to evening (16.00-20.00). The exhibition comprised a set of project image boards, plus printed scheme drawings. It was manned by representatives of Tilbury Douglas, Jon James Studio Architect, and the Urbanists, who were available to discuss the project and answer questions.

A questionnaire and comment sheets were provided for visitors.

It was advertised to some 120 surrounding residences by the delivery of a project newsletter that outlined the proposals and issues considered. Around 20 people attended.

The key issues raised and discussed included:

- Proposed use and form of education;
- Construction traffic impacts;

- Potential parking implications for surrounding areas;
- Impacts of pupils arriving and leaving the facility;
- Form of the community access opportunities; and,
- Potential impacts of the existing Velindre Community School.

A further event is scheduled for 03/10/25 and will be covered in the consultation summary report that will be submitted shortly following the second event.

Figure 11: Engagement materials



6. Planning Assessment

6.1 Introduction

Planning applications must be determined in accordance with the adopted Development Plan unless material considerations indicate otherwise. This requirement is set out in the Planning and Compulsory Purchase Act 2004 (Sec. 38(6)).

To demonstrate how the development proposal satisfies the adopted Development Plan, this section of the statement assesses the proposal against the relevant Development Plan policies. It also demonstrates how the proposal satisfies wider local policy and also wider national policy and legislation. These documents and plans will be considered in the determination of the application.

6.2 Assessment

Theme	Relevant Policy	Compliance Summary
Sustainability	Future Wales Policy 1 - Where Wales will Grow LDP SP3 - Sustainable Communities	The development proposal provides a beneficial reuse of an existing educational facility to serve the community. The delivery of the scheme will provide a space for healthy and cohesive community integration. This has been designed with elements of the scheme being public and semi-public facing. Keeping a distinction between the public and private space in order to create a more coherent scheme.
Regeneration	Future Wales Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking Policy 3 - Shaping Urban Growth and Regeneration - Public Sector Leadership	The design proposal regenerates a vacant building and brings it back into beneficial use. The key architectural details, on the facade and internally, that provide the building with its unique victorian features that have been kept intact. This ensures that the original character of the building is not lost and

	LDP SC2 - Protection of Existing Community Facilities	remains in keeping with its surroundings.
Environment	Future Wales Policy 9 - Resilient Ecological Networks and Green Infrastructure TAN 5 - Nature Conservation and Planning 10 - Tree preservation orders 24 - The historic environment LDP SP1 - Climate Change OS1 - Open Space Provision SP15 - Biodiversity and Geodiversity	The scheme has been designed to support and enhance the green infrastructure on site through landscape and biodiversity enhancements. The design process has followed the stepwise approach and has avoided any significant harm to the biodiversity on site. This has been carefully outlined in the Green Infrastructure Statement provided with the application. The proposed construction works will be undertaken in accordance with a Construction Management Plan to ensure that construction impacts are managed and minimised. The reuse of the building and site shows methods of reducing noise impact to surrounding sensitive receptions (residential). This is evidenced in detail in the Acoustic Design Report.
Connectivity	Future Wales Policy 12 - – Regional Connectivity TAN 18 - Transport LDP TO4 - Walking and Cycling Routes TR2 - Design and Access of new developments	The site is well connected and therefore utilises sustainable modes of transport and active travel. These have been identified and are supported by a Transport Statement and Framework Travel Plan. The proposal has a minibus service to pick up and drop off students. A dedicated on site minibus parking and delivery vehicle bay is proposed as part of the scheme to accommodate this. The space can comfortably accommodate two minibuses or one minibus and one delivery

		vehicle without obstructing other vehicle movements. There are also 18 car parking spaces including two accessible bays.
Design	TAN 12 - Design 24 - Historic Environment LDP BE1 - Design SP21 - Built Environment and Historic Heritage	The development proposal follows the principles of good design to help create a sustainable environment. The high level of design quality has been presented in detail in the Design and Access Statement, highlighting the principles of passive design and biophilic design as well as the six placemaking principles. The development proposal also aligns with the LETI guidance for new schools.
Energy	Future Wales Policy 17 - Renewable and Low Carbon Energy and Associated Infrastructure LDP SP18 - Renewable and Low Carbon Energy RE2 - Renewable and Low Carbon Energy in New Development	The scheme is aligned with Net zero carbon principles and is aiming to achieve BREEAM 'Excellent' status. The redesign of the existing facility has been done in accordance with high performing passive design principles and fabric-first approach. The courtyard space has embraced biophilic design and has landscape integrated within the building footprint supporting physical and mental wellbeing.
Flood Risk	TAN 15 - Development, flooding, and coastal erosion	The site is within Flood zone 2 and 3, however is within a defended zone. The scheme has incorporated SuDS features where possible and will be going through a SAB approval process.
Economy	LDP SP11 - Employment Growth	The scheme promotes a sustainable economy and will provide skills and training, plus facilities for work experience for young people.

Noise	TAN 11 Noise LDP SP16 - Environmental Protection EN8 - Pollution and Land Stability	The scheme benefits from an acoustic design review report which assesses the external sound sources as well as the potential noise impact of the scheme on the surrounding residential area. The report has considered the effects of the external Plastering Building and Construction Area and External Plant Noise Emissions including ASHPs, Substations and Roof Plant equipment. The report provides advice on acoustic screening methods and acoustic attenuation kits to be used to minimise noise impact.
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The above analysis demonstrates that the proposal is fully in accordance with Regional Policy as well as the Local Development Plan. The analysis of the development against the relevant local policy demonstrates that the development is sustainable and reflects good design and placemaking. In this respect, the development complies with the placemaking-led approach of Planning Policy Wales and Future Wales. In being sustainable and reflecting good placemaking practice, the development will also comply with the Wellbeing of Future Generations (Wales) Act, ensuring that future generations in the local area will have a good quality educational provision for vocational subjects.

7. Conclusion

This report is prepared by the Urbanists for Tilbury Douglas, who is the appointed contractor on behalf of Neath Port Talbot County Borough Council. It is prepared in support of the full planning application for the proposed refurbishment and reuse of the Former Library Resource Centre, Reginald Street, Port Talbot.

The site is within the defined settlement boundary, will not conflict with surrounding uses, is highly accessible, and will provide an important facility to improve healthcare outcomes in South Wales.

The scheme has been designed following a comprehensive site baseline analysis, through the detailed educational facility requirements and function analysis, and a formal pre-application submission to Port Talbot. The emerging design has been assessed continually during the design process to ensure that it meets or exceeds the requirements and takes all relevant planning issues and opportunities into account.

The project will significantly improve the provision of local educational services, and has been shown to meet the extensive planning requirements and guidance, with particular focus on placemaking principles, green infrastructure and the sustainable reuse of an existing educational building.