

Planning Department
Neath Port Talbot Council
The Quays,
Brunel Way,
Neath
SA11 2GG

13 October 2025

Dear Sir/Madam,

**DAY'S MOTORPARK NEATH, NEATH ABBEY ROUNDABOUT, NEATH ABBEY, NEATH, SA10 7DF
REQUEST FOR DISCRETIONARY PRE-APPLICATION ADVICE
EXTERNAL UPGRADES AND CHANGE OF USE OF UNIT FROM SUI GENERIS VEHICLE DEALERSHIP TO CLASS
B8 USE WITH ANCILLARY TRADE COUNTER AND ASSOCIATED DEVELOPMENT**

Montagu Evans LLP is appointed by Car Hire (Day of Swansea) Ltd ("the Applicant") to an application proposing external alterations and a change of use from a Sui Generis vehicle dealership to Class B8 with ancillary trade counter use and associated development at Day's Motorpark Neath, Neath Abbey Roundabout, Neath Abbey, Neath, SA10 7DF ("the Site").

Day's intend to vacate the Site in the near future. They have agreed terms with Howdens and Toolstation to occupy it subject to a satisfactory planning permission in accordance with their requirements. The submission follows positive pre application discussions with the Council (LPA Ref. Q2025/0149) in July 2025.

The submission comprises the following documentation:

- Completed Application Forms dated 10 October 2025;
- Certificate A dated 10 October 2025;
- Completed CIL forms dated 10 October 2025;
- Planning Statement (this letter) dated 10 October 2025;
- Drawing No 001 Existing Ground Floor Plan;
- Drawing No 002 Existing First Floor Plan;
- Drawing No 003 Existing Elevations
- Drawing No 004 Existing Elevations;
- Drawing No 005 Location Plan;
- Drawing No 010 Proposed Elevations (East and North);
- Drawing No 011 Proposed Elevations (South and West);
- Drawing No 019 Proposed Block Plan;
- Drawing No 022 Proposed Ground Floor Plan;
- Drawing No 023 Proposed First Floor Plan;
- Flood Consequences Assessment;
- Phase 1 Habitat Survey;
- Phase 1 Site Investigation;
- Green Infrastructure Statement; and
- Transport Note and Servicing and Delivery Management Plan.

The application has been submitted via the Planning Portal (Portal Ref. PP-14295374). The application fee comprising £460 has been paid via the online payment system.

SITE DESCRIPTION AND PLANNING HISTORY

The Site comprises land at Day's Motorpark Neath, Neath Abbey Roundabout, Neath Abbey. It is 0.6 ha in size and currently in use as a vehicle dealership and linked workshop. The Site is prominent, benefits from a frontage onto a well trafficked highway, within the Settlement Boundary, brownfield in nature and in a wider location dominated by commercial uses.

It is in close proximity to highway infrastructure comprising Neath Abbey Road (A474), located to the north from which an existing vehicular and pedestrian access exists via a spine road serving the wider industrial / commercial area to the south.

Development on Site comprises two units totalling 998 Sq. m which have been used for the purposes of the sale and display of vehicles and a linked workshop building. The wider Site comprises hardstanding used for the display of vehicles.

Nath Abbey Road provides a link to A465 and M4 beyond. Bus stops on the A4230 are located circa 280 meters west of the Site from which the No. 4, 34, 38, 155 and 204 services run to a variety of location within Neath and the surrounding area.

Based on NRW Flood Map for Planning, the Site sits within a medium risk area of flood risk from rivers for the purposes of achieving a planning permission (extract below):

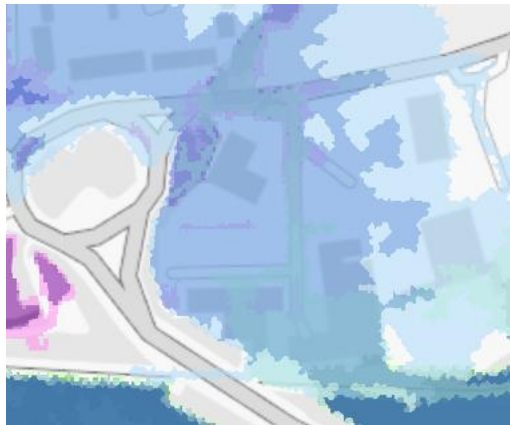


Figure 1 – Development Advice Map Extract

The Site is in relatively close proximity to a SINC Watercourse and a lower risk coal mining area. It is within proximity to a Major Hazard site / pipelines as per the HSE records for the wider area.

A review of Historic Wales records show that the Site is free from any heritage assets that would present issues for the purposes of achieving planning permission. It is not located within or adjacent to a Conservation Area, nor is any element of it is subject of a Listing.

Surrounding uses are commercial in nature including numerous units within a Class B2/B8 use.

PLANNING HISTORY

We have undertaken a search of the planning history of the Site using the Council's online planning explorer. No applications of note have been highlighted which would comprise a material consideration in the context of the proposal subject of this submission.

In accordance with the above, the application comprises a fresh chapter in the planning history of the Site and as such it should be determined in accordance with prevailing local and national Policy.

PRE APPLICATION DISCUSSIONS

The proposed development was subject of positive pre application dialogue with the Council prior to the submission of the application.

The response confirmed the supporting documents package required in order to enable the expedient determination of the submission. Extracts are provided below:

“The proposed development will utilise a soon to be vacant industrial building, which will complement the existing industrial and commercial uses within the vicinity. Furthermore, there are no residential properties within the vicinity of the site who could otherwise be adversely affected in terms of general amenity. Accordingly, I am unable to foresee a likely officer objection to the development as proposed, which is considered to be appropriate in scale and form to the role and function of this existing industrial estate/employment area.”

“It has been noted that this is an existing building, which is not proposed to be extended. However, no further details with regards to design (finishes, materials, etc) have been submitted. Subject to control over the finishes for the buildings, means of enclosure and landscaping, it is considered that the development will have an acceptable impact on the visual amenity of the area.”

“No highway or drainage objection in principle to the proposals submitted, subject to any future planning application submission being in compliance with the following SPG and policy guidance notes.

“The HSE do not advise against the proposed development.”

“In view of the type and form of development proposed in this location, and having regard to internal floor space not increasing, no planning obligations are considered necessary to make the development acceptable in planning terms and to meet the policy and legislative tests for planning obligations.”

The application proposals and supporting information match that requested by the Council in the written feedback.

THE PROPOSED SCHEME

Car Hire (Day of Swansea) Ltd intend to cease trading from the Site in near future. Notwithstanding, they retain a commitment to the ownership of it and are committed to investment to ensure it remains occupied and providing benefits for the residents of Neath.

Terms have been agreed with both Howdens and Toolstation to occupy the existing units on it as part of a strategy to avoid the potential of a long-term vacancy subject to receipt of a satisfactory planning permission in accordance with the requirements of the intended tenants.

Linked to the existing lawful use of the Site, the units within it are, in effect, landlocked within a Sui Generis use allowing for them to be used for the purposes of vehicle sales and ancillary linked activity only. Day's comprise a leading vehicle retailer within the South Wales region with extensive experience within the sector. Based on their experience and knowledge of the market, in addition to commercial advice, it is considered unlikely in the extreme that an occupier can be found without an alteration to the planning use of the Site.

Howdens and Toolstation have agreed to occupy the units subject to planning permission allowing for their occupation within a Class B8 with ancillary trade counter use. Planning Permission is not required for the internal subdivision of the existing unit into separate units in accordance with the intended occupier's requirements.

The primary focus of the application is the intended use of the units. No additional floorspace is to be created. Limited physical development to the unit which will be cosmetic in nature comprising operational requirements for the intended occupiers is set out below.

Regarding the wider Site, there will also be a reconfiguration of existing car parking areas and installation of cycle parking. The existing vehicle and pedestrian access to the Site will be maintained.

The intended external alterations are shown on Drawings 22 and 23 and comprise the following:

- Creation of 2no. shopfronts;
- Creation of 2no. rear servicing areas and linked external alterations;

Drawing 19 shows the wider updates to the Site comprising:

- Creation of vehicle parking consisting of:
 - 16;
 - 2 DDA spaces;
 - 2 EV charging points;
 - Cycle parking spaces; and
 - Servicing areas.

Linked to the above, vehicle tracking drawings prepared by Dynamic Transport Planning form part of the application submission.

Net Benefit for Biodiversity will be achieved via the installation of bird boxes at the Site.

The proposed development will lead to economic benefits via the creation of circa 20no. new positions across the two operations at a range of levels. Jobs will overwhelmingly be sourced locally. The economic benefits comprise a material consideration in the determination of the forthcoming application.

Intended Occupier 1 – Howdens

Howden Joinery Limited operates as a depot to serve small builders within a geographical catchment area of the depot concerned. From incorporation in 1995, they have grown to be a major force in their market, which is demonstrated in the independent kitchens report from Mintel. They operate over 850 depots across the UK.

The company operate within a Class B8 use including an ancillary trade counter for retail sales restricted to trade operators in isolation rather than to the general public.

Within each depot, they store rigid and self-assembly kitchens, bathroom cabinets and associated accessories and joinery products, such as doors, windows etc. It should be noted that no manufacturing or industrial processes of any kind take place within the depots, they purely serve as storage warehouses.

Each depot solely caters for trade-based custom on an account basis and are not aimed at the general retail market. Indeed, stringent controls have been imposed to prevent retail sales from these premises as this would conflict with the company's primary business.

Howdens do not benefit from representation within Neath. The closest outlet to the Site is Unit 17, Aberavon Road, Baglan Industrial Park, SA12 7DJ.

Intended Occupier 2 – Toolstation

Toolstation Ltd is a UK wide subsidiary of Travis Perkins plc with over 550 warehouse/trade counter outlets currently in operation. It specialises in the sale of power tools and accessories, handtools, screws and fixes decorating materials,

heating and electrical supplies, work clothing and other products associated with building/DIY. Each unit stocks approximately 10,000 plus catalogue products and serves predominantly the building industry, although Toolstation do accept trade from private customers.

The required Toolstation opening hours are as follows:

- Monday to Saturday (including Bank Holidays) 07:00 to 20:00; and
- Sundays 09:00 to 17:00.

Toolstation does not benefit from a presence within Neath or Port Talbot. The closest outlet is at Swansea Enterprise Park, Units 9/10, Worcester Court, Mannesman Close, SA7 9FD.

PLANNING POLICY

We consider national policy contained in Future Wales: The National Plan 2040, Planning Policy Wales, various Technical Advice Notes and The Wellbeing of Future Generations (Wales) Act 2015 are relevant to this application. At a local level, the statutory Development Plan comprises the Neath Port Talbot County Borough Council Local Development Plan (2011-2026).

Future Wales: The National Plan 2040

Future Wales: The National Plan 2040 was adopted in February 2021 establishes a national framework setting the direction for development in Wales to 2040.

The Plan forms a development plan with a 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 our communities.

Policy 1 is the overarching framework for where development and growth will be focused in each region. Future Wales' spatial strategy identifies that growth in the South West region should be focused in the Swansea Bay and Llanelli area. The area comprising Neath, Port Talbot, the City of Swansea and Llanelli will therefore be the primary growth area for the region.

Policy 28 identifies Swansea Bay and Llanelli will be the main focus for growth and investment in the Southwest region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

Planning Policy Wales

Planning Policy Wales (PPW) Edition 12 (February 2024) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

The planning system is central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage the use and development of land in the public interest which is consistent with key sustainability principles. Paragraph 3.3 states

“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. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area.”

PPW emphasises that the planning system should support economic growth within the context of sustainable development and that economic development should facilitate regeneration and promote social and environmental sustainability.

Para 5.4.2 identifies:

“Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services.”

Para 5.4.4 states:

“Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development.”

Technical Advice Notes

The following Technical Advice Notes (TANs) adopted by Welsh Government are also considered to be of relevance to this pre-application enquiry:

- TAN 4: Retail and Commercial Development
- TAN 12: Design
- TAN 18: Transport
- TAN 23: Economic Development

The Wellbeing of Future Generations (Wales) Act 2015

The Wellbeing of Future Generations (Wales) Act 2015 places a duty on public bodies that they must carry out sustainable development. The Well-being Goals include:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh Language
- A globally responsible Wales.

Local Development Plan (2011-2026)

The Neath Port Talbot County Borough Council Local Development Plan (2011-2026) was Adopted in January 2016. Under the provisions of the Planning (Wales) Act, it comprises the statutory Development Plan for the Council area.

The Site is located within the Settlement Boundary and is not allocated for a specific purpose as per the Proposals Map (extract below):



Figure 2 – Proposals Map extract

The following policies are considered relevant in the context of the forthcoming application:

- **Policy SC1 Settlement Limits** states, *“development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.”*
- **Policy SP1 Climate Change** states in respect of flood risk, *“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.”*
- **Strategic Policy SP11 Employment Growth** identifies, *“Employment uses will be encouraged in principle within settlement limits”.*
- **Strategic Policy SP20 Transport Network** states, *“The transport system and infrastructure will be developed in a safe, efficient and sustainable manner”.*
- **Policy BE1 Design** identifies, *“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”.*
- **Policy TR2 Design and Access of New Development** relates to highways implications of new proposals. It identifies proposals will be supported where:
 - *“The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;*
 - *Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;*
 - *The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes; and*
 - *Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.”*
- **Policy EN6 Important Biodiversity and Geodiversity Sites** identifies, *Development proposals that would affect Regionally Important Geodiversity Sites (RIGS), Local Nature Reserves (LNRs), Sites of Interest for Nature Conservation (SINCs), sites meeting SINC criteria or sites supporting Local Biodiversity Action Plan (LBAP) or S42 habitats or species will only be permitted where:*
 - *They conserve and where possible enhance the natural heritage importance of the site; or*
 - *The development could not reasonably be located elsewhere, and the benefits of the development outweigh the natural heritage importance of the site.*
- **Policy EN7 Important Natural Features** identifies, *“development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds will only be permitted where:*

- *Full account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; or*
- *The biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed."*
- **Policy EN8 Pollution and Land Stability** states, *"Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to the following will not be permitted."*

Supplementary Planning Guidance

The following SPG is of relevance to this application:

- Planning Obligations (2016);
- Parking Standards (2016);
- Biodiversity and Geodiversity (2018);
- Pollution (2016);
- Renewable and Low Carbon Energy (2017); and
- Design (2017)

Emerging Planning Policy

Neath Port Talbot Council started work on its Replacement Local Development Plan in 2021. An 8-week consultation on the Replacement Local Development Plan Preferred Strategy between 12th December 2024 and 6th February 2025.

The Council is running slightly behind the dates set out in the Delivery Agreement published in October 2023. The Publication version of the Replacement Plan has not yet been released into the public domain. Accordingly, the document is not at an advanced enough stage to comprise a material consideration in the determination of the application.

Summary of Planning Policy

In the context of the scale and type of development proposed, it is our opinion that the proposals should be considered against the following:

- **Are the proposals for a scale of development appropriate?** The proposed development is located within a soon to be vacant unit at Day's Neath Abbey operation. No alteration to the scale of it is proposed by way of the application. We therefore conclude the proposal is of an appropriate scale;
- **Is the proposed development appropriate to the character and appearance of the site and the surrounding built environment?** The Site is tired in appearance and in need of regeneration. The proposed development will comprise a modernisation of its appearance and the facilities it provides and ensure its continued occupation;
- **Is the proposed development easily accessible, or capable of being made easily accessible, by a choice of means of transport, including by public transport, walking and cycling?** The Site forms part of an existing destination that is accessible by train, bus, walking and cycling as well as by private vehicles. The proposed development will provide facilities which the operators have an identified need. Therefore, we conclude that the proposals are fully compliant in this regard; and
- **Will the proposals comprise sustainable economic development?** The proposed development will meet the requirements of the named tenants and therefore contribute positively to the overall economic wellbeing of the area. It will make use of a soon to be vacant unit within the Applicant's operation and result in the creation of new jobs. Accordingly, we conclude that the proposals are compliant in this regard.

PLANNING CONSIDERATIONS

The proposed development comprises the change of use of the Day's Motorpark Neath, Neath Abbey Roundabout, Neath Abbey to allow for occupation by Howdens and Toolstation under a Class B8 with ancillary trade counter use respectively in addition to linked alterations to the unit and Site.

Principle of Development

The Site is soon to become vacant. National operators have agreed in principle to occupy it subject to receipt of a satisfactory planning permission allowing for their use within Use Class B8 with an ancillary trade counter.

In the context of the proposed development, the following observations are made:

- Positive pre application feedback has been provided by the Council prior to the submission of the application. The response confirmed, *"I am unable to foresee a likely officer objection to the development as proposed, which is considered to be appropriate in scale and form to the role and function of this existing industrial estate/employment area."*
- The Site is located within the Settlement Boundary. It is therefore suitable for development in principle;
- Day's no longer consider their operation from the Site to be viable. They are therefore seeking a positive use of the premises and the avoidance of a prominent vacancy fronting the A474;
- The Site is, in effect, landlocked within its lawful use allowing for it to be used for the purposes of the sale and display of vehicles. Owing to a general market downturn in the sector, it is highly unlikely an occupier can be found within the confines of its existing use;
- The Site is surrounded by a mixture of uses including those within Class A and Class B uses. The proposed development will compliment surrounding uses and facilitate linked trips with nearby operators, thus reducing the need to travel between alternative facilities within Neath and Port Talbot;
- The development will make use of the existing structure without significant alteration to it. It is therefore highly sustainable in nature via the repurposing of the unit;
- In pre application feedback, the Council identified Policies EC1 and EC4 as relevant to the proposed development. In this context, the following observations are made:
 - The Site is not allocated for employment purposes; and
 - The existing use is as a Sui Generis vehicle dealership. It is therefore not an existing Class B use;
- In accordance with the above, notwithstanding the Class B8 prevailing use of the proposed occupiers of the Site, the lawful use nor allocation of it are for Class B purposes. The proposed development will, in effect, establish a Class B use at the Site which is consistent with the Council's aspirations for it and the surrounding area;
- The Council highlighted Policy R1 as relevant to the proposals within the pre application response. Notwithstanding, it is noteworthy that neither the existing nor proposed use are within Class A. Both the existing and proposed uses have retail elements, however, they are ancillary in nature to the prevailing use. Accordingly, assessments of retail impact, need or the sequential test are not relevant in support of the application. Further, the proposed occupiers, Howdens and Toolstation are not retail operations, nor are they typically found within Town Centres. The Site is appropriate in the context of their operations and consistent with their requirements;
- The proposal is not speculative. The tenants are pre signed to the development and will occupy it subject to receipt of a satisfactory planning permission;
- The existing vehicular and pedestrian access will be utilised as part of the proposed development;
- The development will modernise and enhance the visual appearance of the Site; and
- The development will result in economic benefits via the creation of circa new positions which comprises a material consideration in the determination of the application.

In accordance with the above, the proposed development complies with the requirements of Policies SC1 and SC11 of the Development Plan and will result in a series of benefits including ensuring the continued economic benefits.

Visual Enhancement

The proposed alterations to the Site are existing are limited and do not extend to additional floorspace or an extension to the unit. The Site as existing is tired in nature and in need of an upgrade. As part of the proposals, external betterments are to proposed including the introduction of separate shopfronts and rear servicing areas in accordance with the requirements of the incoming tenants.

The Council's pre application response identified Policy EN2 Special Landscape Areas as relevant to the proposals. The Site is not located within a Special Landscape Area, however, given alterations to the unit are cosmetic in nature, it is clear the proposal will not result in any detrimental impact on any such surrounding allocations such as Neath Abbey.

The proposed development will therefore deliver the regeneration of the Site in addition to meeting the requirements of the incoming tenants and deliver a refresh to the dated appearance of the Site as existing. It will therefore be resultant in a visual enhancement to the Site when compared to the existing appearance.

A separate Advertisement Consent application is to be progressed by the prospective tenants upon approval of the application to which this Statement relates.

In accordance with the above, the proposed development complies with the requirements of Policy BE1 of the Development Plan.

Access and Highways

It is evidenced above and within the supporting assessments that the Site is within a sustainable location. The proposals include the retention and use of the existing vehicular and pedestrian access.

Vehicle parking is proposed as set on the proposed layout plan. The parking mix has been devised with input from the intended operators based on their extensive experience within the marketplace and includes a greater number of van parking spaces than would be required via the Council's parking standards tied to their trading characteristics.

The application is supported by a Transport Note and Delivery and Servicing Management Plan prepared by Dynamic Transport Planning.

The Transport Note confirms the following:

- The existing access junction along the eastern edge of the site, off the unnamed access road will be retained as existing to serve the proposed site.
- The highway accident data has been reviewed for the most recently available three-year road safety record for the area surrounding the site. The data does not demonstrate any pre-existing patterns or trends of incidents that could be affected by the development proposals.
- The proposed development will be supported by 20 parking bays, inclusive of mobility impaired bays and EV charging.
- A swept-path assessment has been undertaken which demonstrates that the largest anticipated vehicles can continue to be accommodated within the wider site.
- A review of the wider site's accessibility has identified that the site provides some potential for access by sustainable modes of travel, particularly for staff.
- The TRICS trip generation assessment found that during the AM and PM highway peak-hour assessment periods, the proposed development would result in around one two-way movement each minute, during the busiest peak hour.

The Delivery and Servicing Management Plan sets out delivery and servicing arrangements, the number and types of deliveries, anticipated time of deliveries and the location of deliveries

In accordance with the above, the proposed development will accord with the requirements of SP20 and TR2 of the Development Plan.

Sustainable Economic Development

Sustainable development is the cornerstone of the planning system under PPW. The application proposals seek full planning permission to upgrade and enhance the appearance of the Day's dealership, Neath Abbey and facilitate its use as 2no. trade counters to be occupied by Howdens and Toolstation.

As evidenced within the Transport Note which forms part of the application package, the Site is highly accessible private vehicle. It benefits from a frontage onto the A474, and as such, it is accessible to prospective customers in this regard.

The proposed development constitutes sustainable economic development, as it will make use of an existing unit that is not at the end of its lifecycle and soon to become vacant. It will enable the potential for a prominent vacancy to be avoided and ensure the retention of a positive use at the Site.

The proposed development will also adopt the use of sustainable construction methods and materials, and will deliver high quality design, improving the appearance of the unit and wider Site.

We therefore conclude that the proposed development represents sustainable economic development and will secure sustainable economic growth by way of additional job creation in addition to investment in the Site. The proposals are therefore sustainable in nature in accordance with the thrust of Policy SP11 of the Development Plan.

Flood Risk

The Site is located within an area liable to flooding for the purposes of achieving a planning permission. To that end, and key in respect of flood risk, it is a material consideration that no additional floorspace is proposed at the Site.

Unda have prepared a Flood Consequences Assessment (FCA) to support the application. The Assessment confirms:

- The site is located within Flood Zone 3 as defined by Natural Resources Wales (NRW).
- Post development, the site will remain a "less vulnerable development".
- There will be no unacceptable loss of floodplain storage or increase in run-off from the Site.
- Flood proofing of the development will be incorporated as appropriate.
- A flood warning and evacuation plan will be implemented post development.

In accordance with the conclusions of the FCA, the proposed development will not result in any increase to flood risk both in respect of the Site and third-party land. The proposed development is therefore in accordance with the requirements of Policy SP1 of the Local Development Plan.

Ecology and Biodiversity

No demolition works are proposed to the unit as existing. Proposed physical works overwhelmingly consist of external alterations to it. Notwithstanding, as requested during pre-application feedback, a Phase 1 Ecological Assessment has been undertaken by Eyr Gwyn Ecology and forms part of the application package.

The assessment confirms:

- No suitable roosting features for bats were identified. Herring Gulls *Larus argentatus* were recorded on the roof of the building on Site during the site survey. White staining, indicative of bird droppings was also recorded. Therefore, it is considered possible that Herring Gulls could be nesting on the roof the building on Site.

- The Proposed Development will not impact habitats that have suitability for protected/notable species. Therefore, further surveys or preliminary avoidance and/or mitigation measures for protected/notable species are not recommended at this time.
- One Invasive Non-Native Species (INNS) was identified within the Survey Area: Himalayan balsam *Impatiens glandulifera*. Due to the location of the Himalayan Balsam relative to the Site, it is not anticipated that the works will take place close to the INNS.
- Net Benefit for Biodiversity (NBB) enhancements are also recommended, such as the seeding of wildflower meadows and bird and bat box installation. Removal of INNS from the wider Survey Area is also recommended.

Owing to the lack of physical development, the proposals will not result in any detrimental impact on the SINC Watercourse in proximity to the Site.

The proposal will ensure Net Benefit for Biodiversity is achieved via the installation of bird boxes on the exterior of the building.

In accordance with the conclusions of the Phase 1 Ecological Assessment and linked to the lack of physical development associated with the proposal, the application accords with the requirements of Policies EN6 and EN7 of the Local Development Plan.

Green Infrastructure

The application is supported by a Green Infrastructure Statement prepared by Avalon Architecture. The assessment highlights that the proposal will not result in the loss of existing landscaping at the Site.

Given the proposals relate to hardstanding, the proposal does not present an opportunity to increase landscaping at the Site.

Archaeology

The applicant has consulted with Heneb Heritage prior to the submission of the application who have confirmed:

- The Site is located within c100m of an early Roman Fort, discovered during development work in 2021.
- Although the ground had undergone considerable disturbance and change, there were remains of defensive ditch systems and land management features. Other significant remains of Roman date are in the surrounding area.
- On the basis of no physical works or ground disturbance, there would not be a need for mitigation, but any ground disturbance is likely to encounter archaeological deposits, and clearly any such disturbance would require mitigation.

Given there is to be no ground disturbance, the proposed development is acceptable in respect of archaeological considerations.

CONCLUSION

The application proposes external alterations and a change of use from a Sui Generis vehicle dealership to Class B8 with ancillary trade counter use and associated development at Day's Motorpark Neath, Neath Abbey Roundabout, Neath.

Day's intended to vacate the Site in the near future. Terms have been agreed to facilitate the continued occupation of it subject to the approval of the application subject of this Statement.

The application has been subject of positive pre application engagement with the Council prior to the submission of the application. The feedback supported the principle of the proposal and set out the required supporting document package required to enable the determination of the application.

The proposals are sustainable in nature. It will enable the continued positive use of the Site with minimal physical works proposed and meet the requirements of Howdens and Toolstation, the intended occupiers. Further, they will result in economic benefits by way of the creation of new jobs. It is evidenced via the supporting documents that the proposal is acceptable in respect of material considerations associated with the application.

We trust that the above is clear and look forward to receiving confirmation that the application is valid in the near future. Should you have any questions or wish to discuss, please do not hesitate to contact Matthew Gray [REDACTED] at this office.

Yours sincerely,

[REDACTED]

MONTAGU EVANS LLP

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