

PLANNING STATEMENT

Former CSN Engineering, Neath

March 26



Summary

Proposal

Proposed development of Employment Units (B1/B2/B8 Use Class) and associated works

Location

Former CSN Engineering, Neath Abbey Road

Date

March 26

Project Reference

25.165

Client

RWP Properties Ltd

Product of

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Report Revision No.**Disclaimer**

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Introduction

- 1.1 Asbri Planning is appointed as planning agent to RWP Properties Ltd to prepare this Planning Statement to accompany the proposed development of Employment Units (B1/B2/B8 Use Class) and associated works at the former CSN Engineering site, Neath Abbey Road.
- 1.2 The Planning Statement acts as a supporting document to the accompanying planning application and should be read in conjunction with all other elements of the application. The following drawings have been prepared to accompany the application:

Drawing name	Drawing reference
Site Location Plan	Drg No 100
Site Plan	Drg No 01B
Proposed Plans & Roof Plans	Drg No 02A
Block 1 Elevations	Drg No 03A
Block 2 Elevations	Drg No 04A
Indicative Section A-A	Drg No 05A
Proposed Enclosed Bin Store	Drg No 06
Engineering Layout Plan RevA	C2345-C-003
Drainage Strategy RevA	C2345-C-SK02
Existing Site Plan	C2345-C-SK03
Soft Landscape Proposals	LB751_D01a
Swept Path Analysis	1913-ACS-XX-ZZ-DR-T-002-C

- 1.3 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application forms (1APP)	Asbri Planning
Planning Statement	Asbri Planning
Flood Consequence Assessment	JBA Consulting
Green Infrastructure Statement	Laird Bailey
Preliminary Ecological Appraisal	I & G Ecological Consulting Ltd
Site Investigation	Intégral Géotechnique (Wales) Limited
Tree Report	ArbTS - Arboricultural Technician Services Ltd
Noise Impact Assessment	Formant
Drainage Strategy Note	CB3 Consult

1.4 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:

- Section 2: provides a description of the site and its surroundings, including a review of the site's planning history;
- Section 3: summarises the development proposals.
- Section 4: provides an overview of pre-application dialogue undertaken in regard to the emerging scheme.
- Section 5: outlines the relevant planning policy context, at both the national and local level.
- Section 6: addresses the key planning considerations associated with the development proposal.
- Section 7: provides a conclusion regarding the overall acceptability of the application.

Site Description

The site

- 2.1 The site comprises the former CSN Engineering premises at Neath Abbey Road, Neath.



Figure 1: Site Boundary (grid ref. X: 274538, Y: 197512)

Site Description

- 2.2 The site comprises land adjacent to the former CSN Engineering premises as well as previously developed brownfield land located off Abbey Road, Neath. The overall site including CSN Engineering measures approximately 7,200m² (0.72 Hectares) and falls within the defined Settlement Limit according to the Neath Port Talbot LDP (2011-2026). It is bounded by a residential estate to the northeast, an Aldi superstore to the northwest, a small industrial estate to the west and overgrown grassland towards the south. The site can be accessed via the A465 dual carriageway, later connecting to Abbey Road which leads to the site.
- 2.3 The development site consists predominantly of the former CSN unit and existing outbuildings, hardstanding concrete, amenity grassland, scrub and tall ruderal vegetation. There is also a paved, curved access road that leads from the main road into the industrial site along the western and southern boundaries. The site is secured by a gated main entrance that restricts unauthorized access.

Planning History

- 2.4 A review of Neath Port Talbot's online planning register reveals that the site has been subject to the following planning history:

Proposal	Date Determined	Decision
Outline application for area of land to the south of the CSN precision engineering site for employment development within the B use class (B1, B2 & B8) - P2008/1292	04/03/2009	Refused

The Aldi store has since been developed by virtue of application ref: P2019/5304 which excluded the application site and delivered a new access arrangement for CSN Engineering and the application site.

Context Analysis

- 2.5 The site is irregular in shape and is situated just off Neath Abbey Road, which benefits from good access to the A465 and, subsequently, the M4, making it well-connected for transport and logistics. It is located directly behind a newly built Aldi supermarket, offering a prominent and accessible position. To the east, the site is bordered by residential housing, while the north is occupied by the Aldi store itself. To the south lies a railway line and the A465, and the area further east transitions into more industrial uses. There are currently some existing structures on the site, and a high-pressure pipeline runs just west of the site boundary. Neath Town Centre is situated directly east across the A464 dual carriageway.



Figure 2: Site View from above

Highways

- 2.6 The site has convenient highway connectivity due to its close proximity to Neath Abbey Road, which provides direct access to the A465 and the M4 motorway. The road network surrounding the site is well-established, supporting good vehicular access for deliveries, staff and visitors. A bus stop is situated very close by on Neath Abbey Road, offering regular services and enhancing accessibility. Neath railway station is also conveniently located approximately 550 metres (an 18-minute walk) to the east of the site, providing further sustainable travel options and strengthening the site's suitability for a range of potential uses.

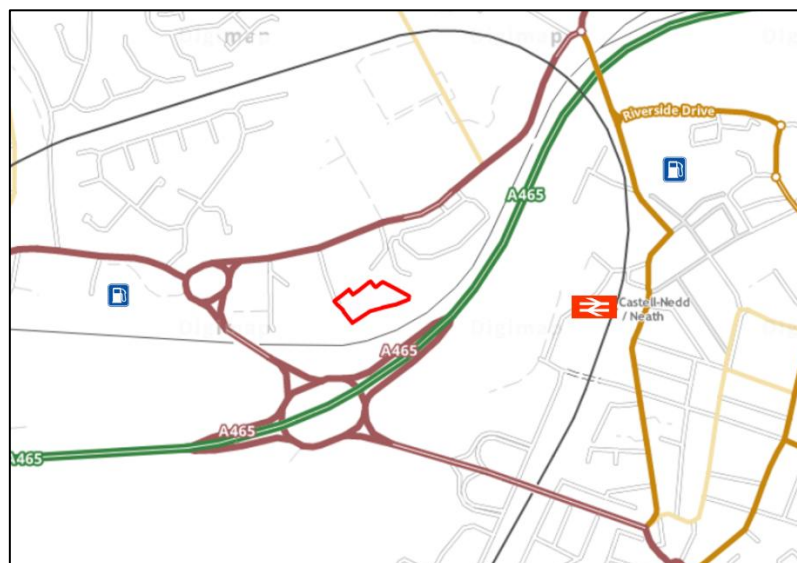


Figure 3: Local Highway/Transport Network

Public Right of Way

- 2.7 There are no recorded Public Rights of Way that run through or adjoining the site according to the Ordnance Survey.

Historic Environment

- 2.8 The Cadw mapping shows the site is not located near any listed buildings. The site is located 400m south west of the designated Scheduled Ancient Monument (SAM) Neath Roman Site (Cadw Ref: GM215) which lies within the playing fields of Dŵr y Felin Comprehensive School.

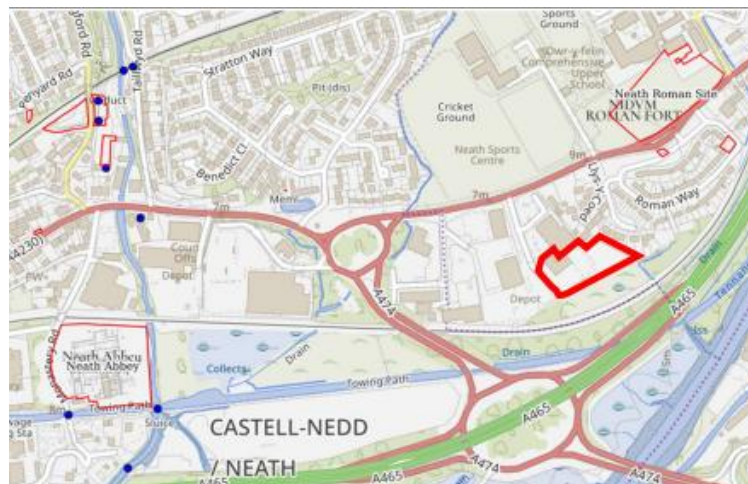


Figure 4: Nearby Historic Assets (Cadw Historical Records)

- 2.9 Additionally, the Historic Wales mapping below shows a number of non-statutory historic records located to the north and east. To the east, there is a record of the former Glyn-leiros Smelting Works (Tin Waste) which would appear to be located in the area now occupied by the residential development known as Glynleiros Gardens.



Figure 5: Historic Wales Map

- 2.10 Given the above and considering the appraisal site consists previously developed land, it is considered unlikely that redevelopment for more industrial units would impact on the setting of the SAM or any undisturbed archaeological assets.

Health and Safety Executive

- 2.11 After consulting with the Health and Safety Executive's (HSE) online mapping advice service, there appears to be a high-pressure gas main running North-South along the site access and down the Western site boundary (figure 6). The following guidance states the following:

- *The proposed development site which you have identified currently lies within the consultation distance (CD) of at least one major hazard site and/or major accident hazard pipeline; HSE needs to be consulted on any developments on this site.*



Figure 6: Health and Safety Executive Report

- 2.12 The map shows that the majority of the site is within an 'Outer Zone'. The industrial units proposed at the site would likely fall within Development type DT1.1 relating to workplaces of less than 3 occupied storeys with less than 100 occupants, and the parking areas with no other associated facilities would comprise Development Type DT1.2. The proposals therefore fall within Level 1, which is the lowest level of sensitivity for a Development Type.
- 2.13 As the site is within the Outer Zones of the map and fall within the lowest sensitivity level, it is noted that the Executive **Do Not Advise Against the Development** (DAA) according to the Decision Matrix of the HSE guidance (Paragraph 35). As such, it appears that there is no in principle concern with development of the site for industrial units from a Health and Safety perspective.

Green Infrastructure and Biodiversity

- 2.14 Given that the site comprises previously developed land, on site vegetation is limited. The site is dominated by hardstanding, close-mown grassland towards the east and centre, with the remainder of the site consisting of concrete. There is overgrown grassland to the south, as well as mature trees and tall hedgerows separating the site from the railway tracks.
- 2.15 There is potential for protected species, particularly roosting bats, to be present within the existing structures and species such as reptiles to be present within the yard. A Preliminary Ecological Appraisal (PEA) has been completed, which has identified the existing biodiversity and habitats at the site. The majority of the site is occupied by light industrial units and tarmac. Tall ruderal vegetation has colonised areas of unconsolidated hard-standing to the east of the units, and small areas of retained grassland. Some areas of the tall ruderal tend towards semi-improved grassland, but at a scale too small to map. An area of immature sycamore and elm growing through bramble scrub is located in the north east corner.

The site is not located within or around a Site of Special Scientific Interest (SSSI) or a Special Area of Conservation (SAC).

Flood Risk

- 2.16 The Natural Resources Wales' (NRW) flood map for planning shows the site sits within flood zone 3 for rivers and sea, and for surface water and small watercourse flooding.

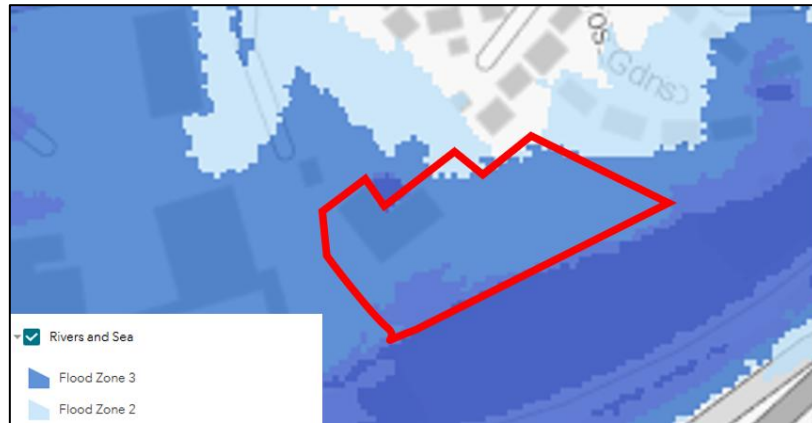


Figure 7: Flood Risk from Rivers and Seas (NRW Flood Map for Planning)

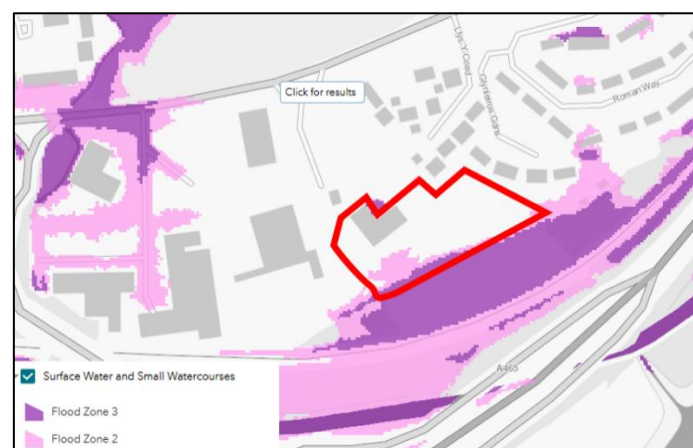


Figure 8: Flood Risk from Surface Water and Small Watercourses (NRW Flood Map for Planning)

Proposals

- 3.1 The proposal seeks to construct 2 industrial blocks (each including 4 units), associated parking bays outside the industrial blocks, and boundary treatment on the land adjacent to the existing CSN Engineering Building, Abbey Road, Neath.

Amount and Scale

- 3.2 The proposal comprises the following:

- 2 x industrial blocks (4 units per block)
 - Block 1: Total area: 340m², Height: 16.35m (53'6ft)
 - Block 2: Total area: 420m², Height: smaller units measuring 14.40m (50'5ft), larger units measuring 14.75m (53'6ft)
- 24 x vehicle parking spaces
 - 8 x operational van bays (2.4m x 5.5m)
 - 20 x car parking bays + 10% EV charging spaces (2.6m x 4.8m)
 - 2 x accessible parking bays
- Acoustic fencing between Blocks 1 & 2 (3.0m high) and barrier planting along eastern boundaries for additional screening
- Enclosed bin store

Layout

- 3.3 The site layout positions the Block 1 industrial building directly to the east of the existing CSN Building, and south of the Aldi superstore. Block 2 is proposed to be positioned along the eastern boundary to the rear of dwellings along Glynleiros Gardens, separated by vegetation. The access road leads from the existing site entrance to the proposed industrial units along the southern boundary. As seen on the site plan, the proposal aims to erect acoustic fencing as well as additional planting to act as a barrier between block 2 and the residential housing to the northeast. This is to minimise and prevent any adverse impacts in respect of noise and visual amenity that the development may pose. The proposal also respects the alignment of the combined sewer running along the eastern boundary behind block 2.

Design and Appearance

- 3.4 The proposed industrial blocks will be constructed and finished with functional, high quality and durable materials. The units will reflect the existing character of the surrounding context, with the area being predominantly industrial.
- 3.5 A high quality and contemporary design will be an attractive asset for the proposed units, which will enhance the surrounding industrial context and increase potential marketability.



Figure 9: Proposed southwest/front elevations (Block 2)

Access and Parking

- 3.6 The proposal will introduce 20 regular car parking spaces (10% EV charging), 8 operational van bays and 2 accessible parking spaces. The parking area will be of reasonable size to allow large vehicles to manoeuvre when loading/unloading outside the industrial units
- 3.7 The site will still be accessed via the existing entrance towards the west along, leading to Neath Abbey Road. Access will be managed through a secured gate at the entry point to prevent unauthorized access into the industrial site.

Boundary Treatment & Landscaping

- 3.8 The proposal intends to retain the green space at the top of the bank to the southeast, as well as planting additional trees along the eastern boundary. The PEA also includes possible mitigation measures which could be implemented during the development construction and operation phase. Soft landscaping proposals include amenity scrub planting within the car park, native structure planting along the eastern/southern boundary, amenity grassland verges, hedgerows, rain garden planting, and a sedum green roof sheltering the bin store.
- 3.9 The existing fence line surrounding the site will be retained to prevent unauthorized access into the site. In addition, acoustic barrier fencing will be erected along the eastern boundary to mitigate the potential noise impact on neighbouring amenity. The northern/eastern elevations of Blocks 1 and 2 will also act as screening from the residential properties to the rear.

Drainage

- 3.10 In respect of drainage, the proposed development will use a fully gravitational surface water and foul drainage system, designed per the latest "Sewers for Adoption" standards and DCWW requirements. The surface water strategy aims to replicate natural drainage and comply with the statutory 'Sustainable Drainage Systems Standards for Wales' and local SAB guidelines.
- 3.11 Site investigations showed suitable infiltration in most areas, so infiltration will be the primary drainage method. However, the access road area lacks sufficient infiltration, so runoff there will be attenuated and discharged at a controlled modified greenfield rate of 0.5l/s into the existing sewer system, assumed to connect to Tennant Canal. More information on the site's drainage can be found within CB3 Consult's Drainage Strategy document included with the application submission.

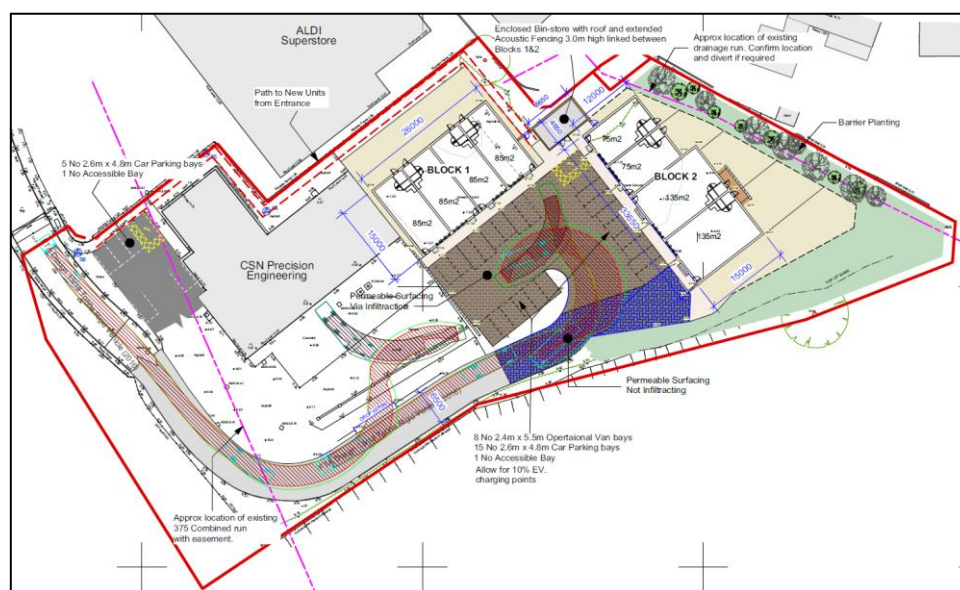


Figure 10: Proposed Site Layout

Pre-Application Discussions

- 4.1 The proposed development has been subject to a pre-application enquiry with Neath Port Talbot County Borough Council (pre-application reference: Q2025/0383). The case officer (Claire Hall) has provided a written report concerning the proposal, and a meeting was held with the officer to discuss principles in detail. A summary of the written pre-application report is provided below.

Officer Assessment

- 4.2 Local Context and Constraints

- Flood Maps for Planning ('FMfP') Zone 3: Rivers & Seas, Surface Water & Small Watercourses
- Tree Preservation Orders T090 & T091
- Contaminated Land
- Low Risk Coal Area
- HSE PADHI Pipeline

Analysis of Proposal

- 4.3 Having regard to the above planning policies, the main issues to consider relate to the principle of the proposed development in this location, the impact on residential amenity, the impact on visual amenity and design, the impact on highways and drainage, flood risk, pollution control, biodiversity/ecology and archaeology considerations.

- 4.4 **The Principle of Development**

- Site is located within settlement limits and Policy SC1 (Settlement Limits) states that sustainable new development that is proportionate in scale and form to the settlement will be acceptable in principle, subject to compliance with other requirements and policies.
- Site is located on an existing industrial estate which would be considered as an 'employment area'.
- Current demand for industrial premises within NPTCBC exceeds supply and it is therefore advised that we contact the Council's Business & Economic Development team to identify what grant funding support may exist for employment uses.
- Proposal to develop B2 industrial units is acceptable in principle in accordance with Policy EC3 (Employment Area Uses).

- 4.5 **Residential and Visual Amenity/Design**

- Siting of Block 1 appears to be acceptable.
- Concern raised with proximity and relative height of Block 2 to neighbouring residential properties.
- Proposed window openings in rear elevation are considered unacceptable, particularly at first floor level with regard to privacy and overlooking.
- Barrier planting and/or acoustic fencing would likely not be sufficient to protect residents from the proposed two storey construction particularly when the end user is unknown.
- A reduction in height and footprint of Block 2 and repositioning further away from these properties is recommended.
- Area not surveyed could be incorporated into the proposal as a mature landscape buffer.
- May be that Block 2 should be considered only for B1 and/or B8 and not B2 end uses in this regard.
- Outdoor amenity spaces should be provided for new or commercial developments for developments over 1,000sqm of floor space.
- Design for SuDS compliant drainage strategy should be shown at Planning Application stage.
- Air/Ground source heat pumps, solar panels and broadband connectivity should be considered.

4.6 **Highways Observations**

- The Parking layout must comply with adopted Parking Standards. There is concern that the introduction of first floors will result in greater parking demand.
- Under current ground floor proposal only, the requirement is one operational van space (2.4m x 5.5m) and two non-operational spaces per unit (2.4m x 4.8m).
- The proposed access width of 5.0m is below the required standard and should be increased to 6.5m to ensure safe two-way movement.
- Please provide CAD drawings of the vehicle tracking for review. Tracking should be updated to reflect a Pheonix Duo Recycler refuse vehicle (P2-15W with Elite 6x4 chassis) to confirm suitability for waste collection
- 2.0m footpath required for pedestrians
- Dedicated bin store needed to facilitate refuse collection and not be 30m from any unit.
- Gates shall be inward opening only and can be seen through.
- No surface water from within the curtilage of the dwelling shall be allowed to flow to a public highway or be connected into the highway drainage system.

4.7 **Drainage Observations**

- SAB Approval will be required.
- Should any springs or ground water seepage be encountered, works on site shall cease until scheme for collection and disposal of the water has been submitted to and approved by the LPA.
- No surface water or land drainage shall connect to Highway Drainage system.
- Adequate provision shall be made for the drainage on site.

4.8 **Local Lead Flood Authority**

As development falls within flood zone, a FCA and Drainage Statement will be required.

4.9 **Pollution Control**

- **Noise**
 - Site neighbours a residential estate and therefore noise levels must be considered both in relation to fixed plant and noise generating equipment.
 - Noise Impact Assessment will be required.
 - Noise from fixed plant will need to meet a noise level of 5db below background level.
- **Odour:** Should any Odour generating uses occupy the units, then an Odour Impact Assessment would be required.
- **Contaminated Land:** Contamination may be present on-site including asbestos.
- **Lighting:** Lighting scheme may be needed.
- **Air Quality and Net Zero:** Facilities of EV charging should be provided.
- **Demolition and Construction:** Likelihood of Asbestos will need to be addressed through construction phase.

4.10 **Biodiversity**

- Green Infrastructure Statement should be submitted with the application.
- Tree Survey may be required.
- There are trees in the neighbouring residential area that are protected by a Tree Preservation Order that may potentially be affected and this impact should be addressed within the Green Infrastructure Statement.

4.11 Advised that we engage Heneb to confirm any archaeological requirements.

4.12 This section considers how the design has evolved throughout the pre-application process and in discussions with the design team. The scheme has been amended to address pre-application comments and comply with relevant national and local policies. Below is a comparison of the initial site plan to the newly revised plan which shows minor changes to the overall layout and design.



Amended full application site plan

- 4.14 In addition, the proposed access road width has been increased from 5.0m to 6.5m in order to satisfy the Highways Officer's comments during the pre-application phase. There will also be a dedicated pedestrian footpath behind the former CSN building, running from the main entrance to the industrial units. This will ensure safe pedestrian access into the site, as opposed to using the access road alongside oncoming vehicles.
- 4.15 The parking layout has been slightly altered to cater for additional spaces and comply with the adopted parking standards. The number and scale of parking was unclear during the pre-application stage; therefore, an indicative layout was used to suggest an ideal plan. This also includes five additional parking spaces and one accessible parking bay west of the existing CSN Engineering Building for staff use.
- 4.16 An enclosed bin store has also been added between both units to facilitate refuse collection, and will also act as an acoustic barrier to protect the amenity of residents to the north. The acoustic barrier along the eastern boundary has been omitted as the Noise Impact Assessment confirms that it is not needed. Noise mitigation will instead be established within the fabric of the buildings and noise limitations will be applied to any plant on the rear elevations of the units.

Planning Policy Context

Introduction

- 5.1 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires *“public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”*.
- 5.2 The Well-being of Future Generations (Wales) Act 2015 plays a significant role in shaping the planning system in Wales, embedding sustainable development principles into planning policy and decisions. The Act reinforces the planning system’s shift towards a holistic, sustainable approach, emphasising that planning in Wales must consider not just present needs but also the well-being of future generations.
- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with **the Development Plan** unless material considerations indicate otherwise.
- 5.4 The Development Plan comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
 - Neath Port Talbot Local Development Plan (2016)
- 5.5 In addition to the Development Plan, the Planning Application has been informed by **Policy** and **Guidance** set out in the following:
- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
 - Relevant Supplementary Planning Guidance

The Development Plan

- 5.6 The development plan comprises Future Wales and the Neath Port Talbot Local Development Plan (2026).

National Development Framework: Future Wales – The National Plan 2040

- 5.7 The National Development Framework: Future Wales – the National Plan 2040 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 our communities. As stated above, the National Development Framework has Development Plan status.
- 5.8 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Pages 54-56 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years’ time, as follows:

A Wales where people live:

- 1 ...and work in connected, inclusive and healthy places
- 2 ...in vibrant rural places with access to homes, jobs and services
- 3 ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth
- 4 ...in places with a thriving Welsh Language
- 5 ...and work in towns and cities which are a focus and springboard for sustainable growth

- 6 ...in places where prosperity, innovation and culture are promoted
- 7 ...in places where travel is sustainable
- 8 ...in places with world-class digital infrastructure
- 9 ...in places that sustainably manage their natural resources and reduce pollution
- 10 ...in places with biodiverse, resilient and connected ecosystems
- 11 ...in places which are decarbonised and climate-resilient

Growth Strategy

- 5.9 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

Policy 1 – Where Wales will Grow

The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- Cardiff, Newport and the Valleys
- Swansea Bay and Llanelli
- Wrexham and Deeside

- 5.10 It is further explained that *"Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources"* (page 60).

- 5.11 The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows: *"Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being"* (page 60).

Economic Action Plan

- 5.12 The Economic Action Plan supports the delivery of Prosperity for All – the national strategy for Wales. It sets out a vision for inclusive growth based on strong foundations, future industries and productive regions. It aims to build resilience and future proof the economy.

- 5.13 The Plan focuses funding support on businesses which align with decarbonisation objectives, are innovative and entrepreneurial, seek to export and import, support skills development and high-quality employment, and support automation, research and development and digitalisation. The Plan identifies national thematic sectors and foundational sectors.

- 5.14 Thematic sectors include high value manufacturing, tradable services (e.g. sale of online services), and enablers (key competitiveness drivers e.g. digital or renewable sectors). Whilst foundation sectors include tourism, food, retail and care. The Plan also introduces a new regionally focused model of economic development.

Placemaking

- 5.15 Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that *"Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration"*.

- 5.16 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

"The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*
- *integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment."*

5.17 Further detail on the Welsh Government's strategic placemaking priorities is set out at Page 66 of Future Wales. Key placemaking principles are summarised below:

Mix of uses

To create activity throughout the day and enable people to walk and cycle, rather than being reliant on travelling by car, places should have a rich mix of residential, commercial and community uses within close proximity to each other. Urban growth and regeneration should integrate different uses within neighbourhoods.

Variety of housing

To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.

Walkable scale

To enable active and healthy lives, people should be able to easily walk to local facilities and public transport. Urban growth and regeneration should be focused within inner city areas and around town centres, as well as around mixed use local centres and public transport. Co-working hubs offering an alternative to home-working are an important feature of the economy, and these should be located in town and local centres.

Density

To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. It may be necessary to take social distancing requirements into consideration when designing public and communal spaces.

Street network

To provide a framework for different uses and types of housing to be integrated within neighbourhoods, urban growth and regeneration should be based on a network of streets that enable social distancing if necessary. The street network should be permeable, with streets primarily connecting at both ends with other streets and providing links into, out of, and through places. The street network should have a hierarchy, with streets that have different characters and functions.

Plot-based development

To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and local builders, urban growth and regeneration should provide opportunities for the development of small plots. A plot-based approach to development should be promoted, including the subdivision of larger sites to be built in small plots or as a group of plots.

Green infrastructure

To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration. Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated.

Biodiversity and Green Infrastructure

- 5.18 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires *“an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable”* (page 76).

- 5.19 In addition to this, the associated importance of green infrastructure is highlighted:

“As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being” (page 78).

- 5.20 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

Policy 9 – Resilient Ecological Networks and Green Infrastructure

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation 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*
- *identify 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.*

Transport

- 5.21 Future Wales identifies that transport in Wales is currently dominated by the car and that *“our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people’s everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people’s health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation”* (page 85).

The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel

choices is highlighted in Future Wales, and it is stated that planning authorities will be required “to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel” (page 85).

Local Level

5.22 The Neath Port Talbot Local Development Plan was adopted in January 2016 and comprises part of the prevailing development plan for the area.

5.23 The following LDP policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
<i>Strategic Policies</i>	
SP 1	Climate Change
SP 2	Health
SP 3	Sustainable Communities
SP4	Infrastructure
SP 5	Development in the Coastal Corridor Strategy Area
SP 11	Employment Growth
SP 15	Biodiversity and Geodiversity
SP 16	Environmental Protection
SP 20	Transport Network
SP 21	Built Environment and Historic Heritage
<i>Topic Based Policies</i>	
I 1	Infrastructure Requirements
EC 2	Existing Employment Areas
EC 3	Employment Area Uses
EC 4	Protection of Existing Employment Uses
EN 6	Important Biodiversity and Geodiversity Sites
EN 7	Important Natural Features
EN 8	Pollution and Land Stability
OB12	Promoting a Sustainable Economy
TR 2	Design and Access of New Development
BE 1	Design

5.24 **Policy SC 1** Settlement Limit: The LDP Proposals Map indicates the subject site is located within the settlement boundary, which indicates that “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.”

5.25 **Policy SP 3** Sustainable Communities: Within the settlement hierarchy for Neath Port Talbot, Neath Abbey is identified as a large local centre with a defined role and function as a “Settlements with adequate public transport links with clusters of one or more retail units and local services, with one or more community facilities and employment provision.”

5.26 **Policy SP 11** Employment Growth: Existing employment uses will be supported and safeguarded and new and expanding employment developments will be encouraged through the following measures:

- 96 hectares of land for employment and business purposes will be allocated for development within the Plan period in the Coastal Corridor Strategy Area to meet economic development and employment needs;
- Additional employment provision will be made within the Strategic Regeneration Areas as part of mixed use, sustainable development in these locations;
- Existing employment areas will be safeguarded for employment uses;
- Premises in existing appropriate lawful employment use will be safeguarded for employment purposes;
- Employment uses will be encouraged in principle within settlement limits
- In the Valleys Strategy Area, a flexible approach will be taken to employment proposals and ‘live-work’ units within or immediately adjacent to settlement limits.

5.27 **Policy EC 3** Employment Area Uses: Within allocated and existing employment areas, unless otherwise specified and where appropriate, uses will be restricted as follows:

- Uses within classes B1, B2 and B8;
- Ancillary facilities or services which support and complement the wider role and function of the primary employment use;
- Commercial services unrelated to class B.

Developments will be required to demonstrate that proposals do not cause any adverse impacts on the overall function of the employment area and neighbouring commercial and residential properties, the proposal can be sustainably justified in this location and is appropriate in scale and form to the role and function of the employment area.

5.28 **Policy OB 12** Promoting a Sustainable Economy: Improve and strengthen the economic base of Neath Port Talbot to increase economic activity, reduce the unemployment rate in line with the Welsh average and negate some of the impacts of a reduced working age population.

5.29 **Policy BE 1** Design: Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 1 It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;
- 2 It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;
- 3 It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;
- 4 It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;

Neath Port Talbot LDP Proposals Map

- 5.30 Neath Port Talbot's Local Development Plan proposals map identifies that the site is located within development limits and has no other designations. As such, it is within an area where development is normally permitted and not subject to any specific allocations or constraints.

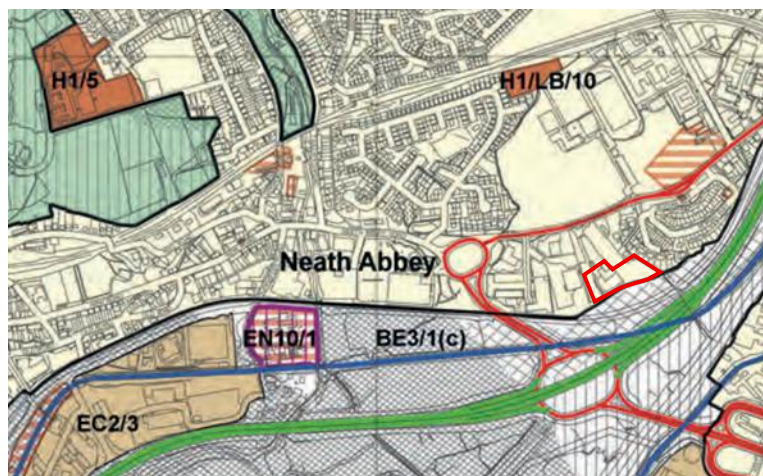


Figure 13: NPTCBC Proposals Map Extract

National Policy and Guidance

Planning Policy Wales Edition 12

- 5.31 Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW is to ensure that the planning system contributes 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.
- 5.32 Sustainable Development is defined at Page 7 of PPW as follows: *"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"*.
- 5.33 Paragraph 1.18 sets out 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"*.

Placemaking

- 5.34 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example states that *"Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities"*.
- 5.35 It is summarised succinctly at Paragraph 2.3 that *"The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all"*.
- 5.36 Placemaking is defined at Page 14 of PPW as follows:

"Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well being in the widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings".

5.37 A set of 'national sustainable placemaking outcomes' are outlined on page 17 PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:

- *Growing our economy in a sustainable manner*
- *Making Best Use of Resources*
- *Facilitating Accessible and Healthy Environments*
- *Creating & sustaining communities*
- *Maximising environmental protection and limiting environmental impact*

5.38 It is highlighted at Paragraph 2.20 that *"Not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being".*

5.39 The implications of COVID are highlighted in Paragraph 2.22, stating for example that *"We must ensure that a post-Covid world has people's well-being at its heart. Planning Policy Wales leads the way in this respect and contains the principles and policies needed for us to recover from this situation in a positive manner. In July 2020 the Welsh Government published Building Better Places⁹ which pinpoints the most relevant policy priorities and actions to aid in the recovery".*

5.40 Paragraph 2.23 confirms that *"Building Better Places recognises the pivotal role that planners play in shaping our society for the future. They must plan for our priorities around placemaking, decarbonisation and well-being. Building Better Places starts to identify action to achieve this and upon which we must build; future reviews of Planning Policy Wales will enable us to further integrate this work. Everyone has a part to play to ensure that the communities of tomorrow benefit from the foresight of today".*

Previously Developed Land

5.41 Previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome. It is recognised, however, that not all previously developed land is suitable for development. This may be, for example, because of its unsustainable location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated.

Economic Development

5.42 PPW defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.

5.43 Paragraph 5.4.2 states that 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. Economic land uses also include construction, energy, minerals, waste and telecommunications

sectors which are also sensitive to planning policy. The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim. Similarly, growth in innovative, emerging technology and high value-added sectors such as advanced engineering, renewable and low carbon energy, digital and bio-technology sectors are also strongly supported. Development plans should consider the role these sectors may play in terms of investment and job creation in their area. This section focuses primarily on traditional employment land uses (B1, B2 and B8) while policies on other economic sectors are found elsewhere in this chapter and other parts of PPW.

Good Design

- 5.44 The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW 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. 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”*.
- 5.45 Good design must enable development proposals to address the issues of inclusivity and accessibility for all, and it is highlighted at Paragraph 3.6 that *“This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport”*.
- 5.46 In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals - Paragraph 3.7 states for example that *“Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution”*.
- 5.47 The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8:
“Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places”.
- 5.48 Paragraph 3.12 outlines that good design is also about avoiding the creation of car-based developments by minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. It is stated that *“Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate”*.

Sustainable Transport

- 5.49 PPW advises at Paragraph 4.1.10 that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:

- *“are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling”.*

5.50 Paragraph 4.1.11 summarises that: *“Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services”.*

5.51 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. Paragraph 4.1.13 sets out that *“The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport”.*

Active Travel

5.52 The importance of developing local active travel networks to help mitigate the impact of new development by providing an alternative mode of travel to the private car is highlighted in PPW. It is stated at Paragraph 4.1.30 that *“Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice”.*

Public Transport

5.53 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this *“by locating development where there is, or can be, good access by public transport”.*

Green Infrastructure

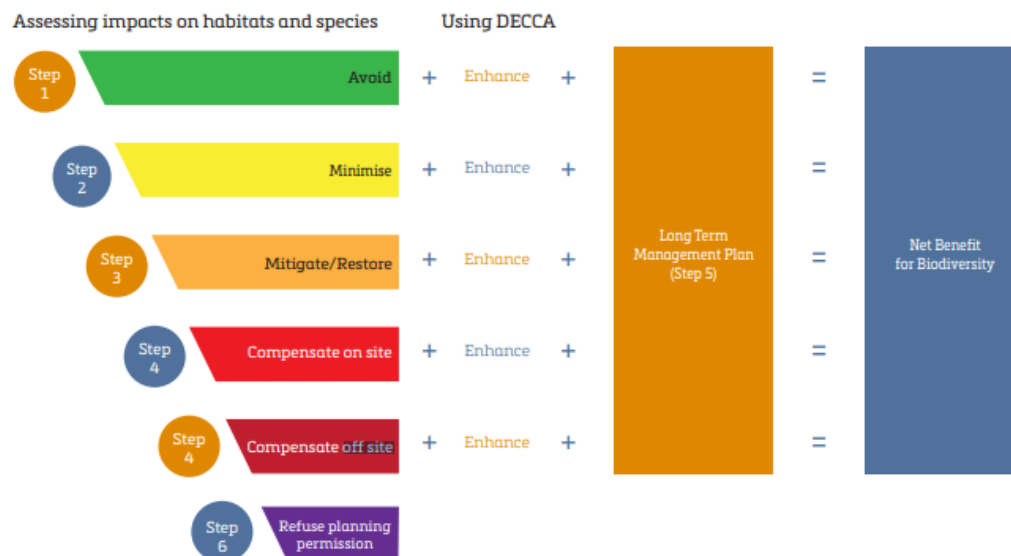
5.54 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.11 that *“The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes”.*

5.55 Paragraph 6.2.12 confirms that *“A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied”.*

5.56 The Step-Wise Approach is depicted at figure 12 and discussed at paragraph 6.4.15 which confirms that the first priority for planning authorities is to avoid damage, if that is not possible then there is a

requirement to minimise, mitigate, compensate on site, and then only as a last resort off-site compensation for unavoidable damage must be provided.

Figure 12: Summary of the Step-Wise Approach



Sustainable Drainage Systems (SuDS)

- 5.57 The importance of considering SuDs as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *"The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development"*. It is advised at Paragraph 6.6.19 that *"Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified"*.

Technical Advice Notes

- 5.58 The following Technical Advice Notes (TANS) are of relevance to the proposed development:
- 5.59 TAN 5 Nature Conservation and Planning (2009): provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.
- 5.60 TAN 11 Noise (1997): provides advice on how the planning system can be used to minimise impact of noise without placing unreasonable restrictions on development. 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.
- 5.61 TAN 12 Design (2016): provides advice on design considerations and states that development should aim to:
- Create places with the needs of people in mind, which are distinctive and respect local character
 - Promote layouts and design features which encourage community safety and accessibility
 - Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles

- *Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building*
 - *Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards*
 - *Secures the most efficient use of land including appropriate densities*
 - *Consider and balance potential conflicts between these criteria*
- 5.62 TAN 15 Development, Flooding and Coastal Erosion (2025): provides technical guidance which supplements the policies set out in PPW and Future Wales in relation to flooding and coastal erosion. It 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. It does not take precedence over other Technical Advice Notes and should be considered alongside other planning policies.
- 5.63 TAN 18 Transport (2007) confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.
- 5.64 TAN 23 Economic Development (2014): includes guidance on the role of land use planning in generating wealth, jobs, and income. It provides detailed planning advice on economic development and emphasises the importance of economic considerations in the planning decision-making process. The TAN also outlines how local planning authorities should assess the economic benefit associated with allocating sites and determining planning applications for economic development.
- 5.65 TAN 24 Historic Environment (2017) states that development in Conservation Areas should put an emphasis on controlled and positive management of change that encourages economic vibrancy and social and cultural vitality, and accords with the area's special architectural and historic qualities.

Local Planning Authority Supplementary Planning Guidance

- 5.66 The following Supplementary Planning Guidance (SPG) adopted by Neath Port Talbot County Borough Council is of relevance to the proposed development:
- *Planning Obligations (October 2016)*
 - *Parking Standards (October 2016)*
 - *Biodiversity and Geodiversity (May 2018)*
 - *Open Space & Greenspace (July 2018)*
 - *Renewable and Low Carbon Energy (July 2017)*
 - *Pollution (October 2016)*
 - *Design (July 2017)*
 - *The Historic Environment*

Appraisal

Overview

- 6.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.
- 6.2 The key material planning considerations are as follows:
- The principle of development
 - Character and appearance
 - Residential amenity
 - Flooding
 - Sustainability
 - Economic development
 - Highways, access and parking
 - Other material considerations

The principle of development

- 6.3 The development site falls within the settlement limits of Neath as defined by LDP Policy SC1 and associated proposals map. Development within settlement limits that is proportionate in scale and form to the role and function of the settlement is generally supported in principle. Para. 3.0.13 states: "They allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the strategy." Furthermore, PPW outlines that previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. The site is brownfield in nature and therefore, the principle of developing this site is acceptable in this regard. The site lies within an inherently sustainable location, having direct access to local highways and services within the area, making it an ideal location for transporting large goods and logistics.
- 6.4 The site is not allocated for a specific use within the adopted LDP and therefore represents 'white land' within the settlement boundary, where a range of development should be considered acceptable in principle subject to compliance with the other policies of the Plan. The supporting text confirms this position within para 3.0.14, stating: "Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy and subject to it being proportionate in scale and form to the role and function of the settlement".
- 6.5 The proposal is directed towards an established settlement. Neath Abbey is recognised as a 'large local centre' within the settlement hierarchy under Policy SP 3 18 'Sustainable Communities'. It is considered the proposal accords with the role and function of the settlement and will therefore maintain a sustainable community by improving employment floorspace provision. On this basis the proposal adheres to Policy SP 3. It is therefore considered the modest quantum of employment floorspace is appropriate and corresponds with the scale and form of the settlement.
- 6.6 Pre-application discussions with the planning officer highlighted that the current demand for industrial premises within the Neath Port Talbot County Borough exceeds supply. The officer later concluded that *"the proposal to develop the site for B2 industrial units is therefore considered to be acceptable in principle, subject to all other development management considerations as detailed in the following sections."*

- 6.7 Policy SP 11 'Employment Growth' indicates new and expanding employment developments will be encouraged. The Policy indicates employment uses will be encouraged in principle within settlement limits. Additionally, within the Coastal Corridor Strategy area a flexible approach will be taken to employment proposals within settlement limits.
- 6.8 Given the flexible nature of the application, the end users of the units are not currently known but it is anticipated that the development will result in a series of economic benefits including significant job creation on site which is estimated to in the region of 3-5 full time employment positions per unit which equates to 24 – 40 positions. In addition, it is considered that the proposed development will facilitate wider economic growth within Neath and the County Borough by encouraging economic activity in the area and through supply chain relationships with existing businesses.
- 6.9 Despite not being allocated for a specific use, it lies adjacent to the existing CSN Engineering building which comprises an employment use. Development of the site for industrial units therefore represents a conforming land use. In light of the above, it is considered that the principle of development is firmly established, as confirmed by the planning officer.

Character and Appearance

- 6.10 The proposed industrial blocks will be constructed and finished with functional, high quality and durable materials. The units will reflect the existing character of the surrounding context, with the area being predominantly industrial.
- 6.11 In accordance with Policy BE 1 (Design), proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 6.12 ***It complements and enhances the character and appearance of the site, buildings or area in terms of siting, appearance, scale, height, massing, and elevation treatments.***

The proposed development intends to construct two modern industrial blocks comprising a total of 8no. units which compliments the design of the existing units within the area, such as the LH Evans unit and LBS Building Merchants to the west comprises of a similar layout, height and design of the proposed plans. Additionally, the Aldi store and car park directly north of the site is a new development and therefore the proposed units would replicate the same modern design principles and adopt the same principle of utilising redundant land.

- 6.13 ***It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges.***

In terms of the surrounding context, the proposal aims to construct industrial units in a mixed-use area featuring retail, industrial and other employment uses and is therefore reflective of the local landscape. After reviewing Cadw's historic map, the it is also considered unlikely that the development would impact on the setting of any listed buildings. Notwithstanding, it is acknowledged that the site lies in an area of high archaeological potential due to its proximity to the Neath Roman Fort which is designated as a Scheduled Ancient Monument.

- 6.14 ***It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate.***

The proposed materials have not yet been specified; however, the elevation plans indicate that the buildings will incorporate similar materials to those used for the surrounding industrial units. The plans also propose barrier planting for added screening between the development and the existing residential properties.

6.15 ***It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community.***

The proposal will not impact on the surrounding highway network as it will utilise the new access developed by virtue of the Aldi development. The application is accompanied by vehicular tracking which demonstrates that the site and the adjacent CSN Engineering are accessible by 10m rigid vehicle subject to widening of the existing access road.

As mentioned, additional screening and noise mitigation will be provided to ensure no adverse impacts on the amenity of neighbouring residential land owners. The proposed site layout also shows that the development will not impact the Aldi store or car park to the north.

6.16 ***Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible.***

Given that the majority of the site consists of previously developed land and hardstanding grassland/concrete, there will be limited impacts on the site's green space/vegetation as the proposal will not build on the existing grassland to the east. Additional landscaping and native planting will be proposed to enhance the site's biodiversity.

6.17 ***It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well-lit environments and areas of public movement).***

The development will be within a large open space to facilitate easy movement. In addition, it will make use of an otherwise redundant site enhancing natural surveillance.

6.18 ***It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community.***

There are numerous public transport services nearby, including bus stops along Neath Abbey Rd/A4230 and Neath Train Station within an 18-minute walk. The site can also be accessed on foot via the existing footpath west of the Aldi store, which can also accommodate cyclists if needed.

6.19 ***It uses resources, including land and energy, as efficiently as possible through making the best and most efficient use of existing/brownfield land, with the layout and form of the development not precluding on the reasonable use of other adjacent land.***

In this aspect, the development makes use of previously developed brownfield land for employment uses and economic development, meaning there should be no issues with regard to efficient land use. The proposal will also incorporate solar PV panels on the roofs of each industrial unit. Translucent rooflights are also proposed to maximise natural light into the units, which will also reduce reliance on artificial lighting during daylight hours, thus improving energy efficiency and reducing overall energy costs.

6.20 ***Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution.***

The proposed development will be subject to an application to the SuDS Approval Body (SAB) and the proposed surface water strategy comprises a porous surface storage area for the car park and access. As the application site lies in an area of flood risk, a Flood Consequence Assessment has been prepared to accompany the application.

6.21 ***The layout and design of the development achieve inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.***

The proposal includes a large car park, wide roads, and even tarmac to facilitate disabled users.

6.22 The proposal satisfies the requirements of Policy BE 1 (Design) within the adopted LDP, as the development demonstrates high quality design which fully takes into account the natural and built environmental context and contributes to the creation of attractive, sustainable places.

6.23 To conclude, a high quality and contemporary design will be an attractive asset for the proposed units, which will enhance the surrounding industrial context and increase potential marketability. The proposed design templates were welcomed by the planning officer. Overall, the design principles comply with local policy and therefore should be considered acceptable.

Residential Amenity

6.24 The site boundary adjoins existing residential properties to the East; therefore, it is important that the development does not negatively impact the amenity of the existing dwellings. Criterion 4 of Policy BE 1 state that proposals should not have a significant adverse impact on the highway safety, the amenity of occupiers of adjacent land or the community. The proposed site plans and Noise Impact Assessment illustrate that the proposed bin store will act as acoustic barrier. Barrier planting is also proposed along the eastern boundary to act as screening. This will reinforce additional screening to the site and will reduce any adverse impact in respect of noise generating activities and visual amenity on adjacent residential properties. Precautions will also be taken with regard to residential amenity during the construction phase to minimise any unnecessary noise, dust, or environmental impacts on neighbouring properties.

6.25 A Noise Impact Assessment has been undertaken by Formant Ltd to review the potential noise impacts arising from the proposed industrial development on land adjacent to the CSN Engineering site. The results of the computer noise model have been used to predict the specific sound level from each individual source at the nearest NSR location (residential properties along Glynleiros Gardens). The data concluded that the predicted cumulative ratings levels are at least 6.9 dB below the background levels during daytime and 5.5 dB below background during night time at the NSRs. In line with BS 4142, this is considered a 'low impact' depending on the context. In addition to this, noise barrier screening, fixed plant noise limits, and building envelope sound insulation are proposed to mitigate the potential impact of noise on adjoining residents. After reviewing the data and analysis within the NIA, it is considered that no significant adverse impacts are predicted at the NSR locations as a result of the proposed development (i.e. the properties along Glynleiros Gardens directly east).

6.26 It is noted in the pre-app response (ref: Q2025/0383) that concerns were raised in relation to the proximity and relative height of the proposed units within Block 2 to the residential properties/gardens directly east. A reduction in the height and footprint of Block 2 and its repositioning further away from these neighbouring residential properties was therefore recommended. These concerns have been addressed by bringing Block 2 forward, increasing the closest wall-to-wall separation distance from 16m to 17m (rear garden extension) and from 30m to 32m between no. 3 Glynleiros Gardens. In addition to this, the overall height of Block 2 has been reduced from 16.35m to 14.75m, and the pitch of the roofs is also reduced to 15 degree further lowering the overall height of the units. Furthermore, the proposed development is compliant with the 25-degree rule, ensuring that it will not result in an adverse impact in respect of overbearing and overshadowing on No. 3 Glynleiros Gardens.

6.27 The units will only contain ground floor space despite being 2 storeys in height, which will mitigate overlooking into the rear gardens. It is noted that the distance between the properties do not exceed the 21m standard distance, albeit given the orientation of the proposed units as opposed to being directly side-on, this relationship is considered to be acceptable.

- 6.28 The planning officer also mentioned that ‘the additional planting/acoustic fencing would not be sufficient to protect residents from the proposed units, particularly when the end user is unknown and B2 has the potential to be noisiest employment use’. To address this, we have considered proposing a potential mixed employment use of B1, B2 and B8 as opposed to an exclusive B2 use to reduce potential noise impacts. Notwithstanding, this approach would be dependent on the potential occupiers.
- 6.29 In light of the above, the proposed plans have been amended to address the concerns raised on neighbouring amenity during the pre-application phase. The development considers the proximity of the residential properties along Glynleiros Gardens by respecting the privacy and amenity of neighbouring residents. It is considered that the proposal complies with Policy BE 1 (Design) of the Neath Port Talbot LDP as the plans have been adapted to minimise any adverse impacts on the amenity of occupiers of adjacent land/residents. The positioning and dimensions of Block 2 has been adapted to address the concerns raised during pre-application discussions, by increasing the separation distance between the neighbouring properties and reducing the overall height of the proposed units. Other mitigations include acoustic fencing and planting to screen the units and minimise the potential noise impact.

Flooding

- 6.30 As mentioned above, the application site falls within flood zone 3 for rivers and sea, and for surface water and small watercourse flooding. This means there is a combined 1% risk of flooding from rivers and seas, and within an area with more than 1% (1 in 100) chance of flooding from surface water and/or small watercourses in a given year, including the effects of climate change.
- 6.31 The application is accompanied by a Flood Consequence Assessment prepared by JBA which identifies that the proposal is classified as less vulnerable development under TAN 15 but is subject to flood risk from fluvial and tidal sources associated with the River Clydach and River Neath. The site is at low risk of reservoir and sewer flooding and very low risk of surface water flooding. The site is located in an area at high risk of groundwater flooding, although this is less significant than the fluvial and tidal risk and can be mitigated alongside these sources.
- 6.32 Hydraulic modelling has been completed based on the River Neath 2015 1D/2D ESTRY TUFLOW model to assess fluvial and tidal risk. Post-development modelling was undertaken to inform mitigation to demonstrate that the development will be safe and ensure it will not increase flood risk elsewhere.
- 6.33 Finished Floor Levels will be raised above the fluvial 1% AEP plus climate change and tidal 0.5% plus climate change event in accordance with TAN15 frequency thresholds, i.e. a minimum finished floor level of 7.05mAOD. Plans in Appendix B show finished floor levels of 7.20 mAOD.
- 6.34 In conclusion, the FCA has found that in respect to flood risk, the development meets the requirements set out in TAN-15 and the aims of Planning Policy Wales. The mitigation measures within the FCA have been implemented to reduce the impact of flood risk on the development and third parties.

Sustainability

- 6.35 The site is based in a highly sustainable location within the defined settlement boundary, and is in close proximity to nearby services, facilities, community assets and public transport nodes in Neath Abbey. There are numerous bus stops which are close to the site long Abbey Road, which provide access to regular services to Neath Town and Abercraf. The site benefits from good connections to surrounding infrastructure and active travel facilities. The site has direct access to the A465 dual carriageway, just 2.7 miles northeast of the M4 motorway, making it a strategic location for transporting goods within South Wales. The existing accesses benefit from pedestrian pavements on both sides of the carriageway.

- 6.36 As mentioned, the proposal will incorporate solar PV panels on the roofs in order to achieve low or zero carbon and increase the marketability of the newly proposed industrial units. Translucent rooflights are also proposed to maximise natural light into the units, which will also reduce reliance on artificial lighting during daylight hours, thus improving energy efficiency and reducing overall energy costs. The building exterior will contain insulated metal panels/cladding, reducing the need for excessive heating and cooling, leading to lower energy costs. The material palette will consist of high quality and durable materials, ensuring longevity and stability.
- 6.37 The proposed units will be built on previously developed brownfield land, which is a sustainable approach to new development through utilising existing land use. This minimises the impact on local biodiversity and green infrastructure, and where possible, creating an opportunity to provide a net benefit biodiversity to the site.
- 6.38 Overall, the new development will contribute towards economic and sustainable growth within Neath, by providing space for local businesses to grow as well as offering new employment opportunities. As defined by Policy SC1 and the Neath Port Talbot LDP Proposals Map, the site lies within a sustainable location within the designated settlement limits. The site also has direct access to the local highway network and public transport, making it a sustainable location for transport and logistics.

Economic Development

- 6.39 The In respect of economic development and prosperity, PPW states "For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. Economic land uses include the traditional employment land uses 19 (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services".
- 6.40 The planning officer expressed that the current demand for industrial premises within the Neath Port Talbot County Borough exceeds supply and the applicant is therefore advised to contact the Council's Business & Economic Development team to establish what grant funding or other support may be available to help deliver this site for traditional (B1/B2/B8) employment uses.
- 6.41 LDP Policy EC3 states that:
'Within allocated and existing employment areas, unless otherwise specified and where appropriate, uses will be restricted as follows:
- *Uses within classes B1, B2 and B8;*
 - *Ancillary facilities or services which support and complement the wider role and function of the primary employment use;*
 - *Commercial services unrelated to class B*

Developments will be required to demonstrate that proposals do not cause any adverse impacts on the overall function of the employment area and neighbouring commercial and residential properties, the proposal can be sustainably justified in this location and is appropriate in scale and form to the role and function of the employment area.'

- 6.42 The proposal will provide new, modern employment floorspace, creating an opportunity to further economic development and prosperity in the community. Furthermore, PPW indicates "Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration". Accordingly, the development aligns with the generation of economic prosperity.

Highways. Access and Parking

- 6.43 The application site falls within a strategic location for industrial activity, with direct access to the A465 and surrounding highway network. Vehicular and pedestrian access will be achieved utilising the existing access/egress spur that lead into the site via Abbey Road to the West of the Aldi car park.
- 6.44 Following on from pre-application advice from the highways officer, the proposed access width has been increased from 5.0m to 6.5m to ensure safe two-way movement of vehicles. This complies with the minimum requirement set out in the Neath Port Talbot Highway Technical Design Guide, allowing adequate room for heavy vehicles to enter and exit the site efficiently.
- 6.45 In addition, the proposal will provide 15 regular car parking spaces (10% EV charging provision in line with Policy 12 of Future Wales), 8 operational van bays, and 1 accessible parking bays for the new units. This is considered to be sufficient parking provision for the proposed development, considering the units will only comprise ground floor industrial use. The scale of the parking spaces will measure 2.6m x 4.8 (regular car parking spaces) and 2.4m x 5.5m (operational van spaces) to satisfy the minimum requirements set out by the Highways Officer and the NPT Parking Standards (2016). New parking provision will also be provided for the former CSN Building as the proposal requires road widening on the area of the existing parking.
- 6.46 As seen in the proposed site layout and vehicular tracking, the development will provide a generous area for internal vehicular movements within the site. It is anticipated that vehicles accessing the site will be able to enter, manoeuvre to turn, and leave the site in a forward gear.
- 6.47 A separate pedestrian footpath will be provided behind the existing CSN Engineering building, which will lead from the main access gate to the main courtyard between the 2 industrial blocks. This will allow safe pedestrian access into the site without forcing people to share the access road beside oncoming vehicles. A designated enclosed bin store will also be included between Blocks 1 & 2 to facilitate refuse collection within the car park. The carrying distance for bins does not exceed 30m from any individual unit to the collection point.
- 6.48 To conclude, the proposal complies with the Neath Port Talbot Highway Technical Design Guide and the adopted Parking Standards by providing adequate parking provision and suitable vehicle access for the proposed use. The development will also provide sufficient space for larger vehicles to manoeuvre within the site to avoid congestion. In terms of highway considerations, it is considered that the proposal meets the requirements of Policy TR 2 (Design and Access of New Development) as the development provides an appropriate level of parking provision, allows safe manoeuvring for service and larger vehicles, and is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes. Given the site is located within an existing industrial park, it is considered that the scale of the development will not have an adverse effect on the highway safety or create unacceptable levels of traffic generation.

Other materials considerations

Health and Safety Executive

- 6.49 As identified above, the presence of a nearby high-pressure main means that the site sits within an 'Outer' HSE consultation zone. In this area, the Executive Do not Advise Against development for workplaces as they comprise the lowest level of sensitivity. As such, development of industrial units in this area is deemed acceptable in principle from a Health and Safety executive, but it is still recommended that the Executive are consulted as the proposal progresses.

Biodiversity and Green Infrastructure

- 6.50 Given that the site predominantly comprises previously developed land, on site vegetation removal will be minimal. The site is dominated by hardstanding concrete and unmaintained grassland. The proposal will revitalise the site's green infrastructure by providing soft landscaping such as amenity scrub and native structure planting, amenity grassland, hedgerows, rain garden planting, and a sedum green roof to shelter the bin store.
- 6.51 A Green Infrastructure Statement has been prepared by Laird Baley to identify the local Green Infrastructure (GI) network both within and surrounding the site, illustrating how the development proposals follow a step-wise approach to avoid, minimise, mitigate, and, where required, compensate the local GI in line with Chapter 6 of Planning Policy Wales (Edition 12).
- 6.52 The development seeks to avoid, as far as possible, existing scrub on the north east boundary. The sycamore in the northern corner of the site, along with trees and vegetation along the southern boundary, will be unaffected by the proposed development. Tall ruderal vegetation colonising unconsolidated ground across the development area will be impacted by the development, however this will be offset through the development of native structure planting, which includes a range of fruiting and flowering shrubs and trees. The proposals will provide habitat opportunity for local wildlife and provide a net benefit biodiversity value compared to its current state.
- 6.53 Landscape management will include an appropriate aftercare period to ensure that any retained and created habitats, connections and landscape planting are established well and are maintained for connectivity and health.
- 6.54 Due to the existing predominantly unmanaged scrub and colonising tall ruderal vegetation on site, the development proposals will introduce significant improvements to onsite GI to both diversity and quality. The Native species will be used throughout the scheme to create and enhance the development's peripheral corridors linking the site with the SINC to the south. A range of landscape typologies will be introduced, diversifying biodiversity, providing important ecological habitats and enhancing the neighbouring residential amenity. Existing scrub will be retained and brought under active management. Habitat boxes for both birds and bats will be integrated into proposed units, providing nesting opportunities across the site.
- 6.55 Given the Green Infrastructure design and long-term management proposals, it is considered that the proposed scheme fully complies with Chapter 6 of Planning Policy Wales (Edition 12) which sets out the policy for biodiversity and nature. The proposal also adheres to the guidance provided within Policy EN7 (Important Natural Features) as the development does not adversely affect ecologically or visually important natural features, and where possible, provides sufficient enhancements to enrich the site's green infrastructure.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of RWP Properties Ltd in relation to the proposed full planning application for the proposed development of Employment Units (B1/B2/B8 Use Class) and associated works.
- 7.2 The proposal meets the guidelines within Policy SC1 as the site falls within the defined Settlement Limits of Neath Port Talbot County Borough, where development that is proportionate in scale, form and function set out in the Settlement Hierarchy should be considered acceptable in principle. The proposal will also be developed on previously developed brownfield land and should be deemed as favourable sustainable development. Additionally, the Local Planning Authority have not raised any in-principle objection or concern regarding this policy, and therefore the principle of development is firmly established.
- 7.3 The proposal satisfies the requirements of Policy BE 1 (Design) within the adopted LDP, as the development demonstrates high quality design which fully takes into account the context of the existing industrial area. It was noted in the pre-application response that concerns were raised over the proximity of the industrial units to the adjoining residential properties to the east, therefore careful consideration has been made to ensure minimal disturbance on the privacy of adjoining residents. The height, positioning and potential use of Block 2 has been amended prevent any significant noise or overbearing impacts on adjoining residents. It is considered that the proposal complies with Policy BE1 (Design) as the scheme has been adapted to minimise any adverse impacts on the amenity of occupiers of adjacent land/residents.
- 7.4 It is deemed that the development meets the requirements set out in TAN-15 and the aims of Planning Policy Wales. The mitigation measures within the FCA have been implemented to reduce the impact of flood risk on the development and third parties.
- 7.5 The proposals will not pose any impacts on the highway network, as access to the site will continue to be via the existing entrance point. The development is compliant with the Neath Port Talbot Highway Technical Design Guide and the adopted Parking Standards as adequate parking provision and suitable vehicle access is provided for the proposed use. The proposal meets the requirements of Policy TR 2 (Design and Access of New Development) as the development provides an appropriate level of parking provision, allows safe manoeuvring for service and larger vehicles, and is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes.
- 7.6 Given the site predominantly comprises brownfield land, on site vegetation removal will be minimal. The scheme proposes to introduce soft landscaping and wildlife habitats which will enhance the site's green infrastructure and provide a net benefit biodiversity value. The proposal satisfies the requirements within the step-wise approach from Planning Policy Wales (Edition 12) as well as Policy EN7 as the development does not adversely affect ecologically or visually important natural features, and where possible, provides sufficient enhancements to enrich the site's green infrastructure.
- 7.7 The proposals therefore comply with the relevant national and development plan planning policies and supplementary planning guidance. It is for these reasons that it is respectfully requested that Neath Port Talbot County Borough Council grant planning permission for the proposed development.