

PLANNING STATEMENT

**Land north of Harbour Way,
Harbour Side Regeneration Area,
Port Talbot**

June 2024



Summary

Proposal:

Construction of a new building comprising offices, research and development and light industry (B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant, substation, sprinkler store, gas store and associated works

Location:

Land north of Harbour Way, Harbour Side Regeneration Area, Port Talbot

Date:

September 2024

Project Reference:

23.251

Client:

Neath Port Talbot County Borough Council

Product of:

Asbri Planning Limited
Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff CF23 8RS

Prepared by:

Liam Griffiths | Senior Planner

Approved by:

Barrie Davies | Director

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Asbri Planning Ltd on behalf of Morgan Sindall and Neath Port Talbot County Borough Council (NPTCBC), in support of a Full Planning Application for the construction of a new building comprising offices, research and development and light industry (B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant, substation, sprinkler store, gas store and associated works at land north of Harbour Way, Harbour Side Regeneration Area, Port Talbot.
- 1.2 The site is located within Harbourside Strategic Regeneration Area which is designated to provide mixed use development in the period of the LDP. The proposals will assist in meeting the employment allocation by providing a new building comprising offices, research and development and light industry (B1 use).
- 1.3 The new facility is a collaborative innovation centre working with academia, namely Swansea University as a key stakeholder to help end users from the steel and an end user from industry to develop and deploy new technologies, products and processes to help move the steel industry move towards a net zero carbon future.
- 1.4 The following application plans/drawings are submitted:

Drawing Reference	Drawing Name
26CB02-ARC-31-00-D-A-200100-P03	Proposed Floor Plan Level 00
26CB02-ARC-31-01-D-A-200101-P02	Proposed Floor Plan Level 01
26CB02-ARC-31-01-D-A-200102-P02	Proposed Floor Plan Level 02
26CB02-ARC-31-R3-D-A-200103-P02	Proposed Roof GA Plan
26CB02-ARC-30-00-D-A-100000-P02-	Site Location Plan
26CB02-ARC-30-00-D-A-100001-P02-	Existing Site Plan
26CB02-ARC-33-XX-D-A-200120-P02-	Proposed Sections
26CB02-ARC-32-XX-D-A-200110-P05-	Proposed Elevations
26CB02-FRL-01-XX-D-L-1001	Landscape Masterplan
26CB02-FRL-01-XX-D-L-1005	Planting Plan and Specification
26CB02-FRL-30-XX-D-L-1006	Green Infrastructure Strategy
26CB02-FRL-30-XX-D-L-1007	Block Paving Layout
26CB02-FRL-30-XX-D-L-1008	Site Furniture and Stores
SWI-HYD-XX-00-DR-C-0600	Drainage Layout
SWI-HYD-XX-00-DR-C-0700	External Works
SWI-HYD-XX-00-DR-C-1042	Site Sections

SWI-HYD-XX-00-DR-C-3200	Long Sections
26CB02-HYD-55-XX-D-E-550002_	External Lighting Isolines Layout
3292-U-001 - 013	Topographical Survey

1.5 The following supporting documents are submitted alongside the Planning Application:

Document Name	Prepared By
Planning Application Form	Asbri Planning
Planning Statement	Asbri Planning (March 2024)
Design and Access Statement	Arcadis (March 2024)
Baseline Noise Survey Report	Formant (May 2023)
Combined Phase 1 and Phase 2 Ground Investigation Report	Hydrock (December 2023)
Energy and Sustainability Statement	Hydrock (March 2024)
Transport Statement	Hydrock (June 2024)
Travel Plan	Hydrock (June 2024)
Sustainability Report	Hydrock (June 2024)
Flood Consequence Assessment	JBA (March 2024)
Ecology Update Note	NPT Ecology
Biodiversity Mitigation Strategy January 2021	WSP
Ecology Report 2019	NPT Ecology
Ecology Update 2021	NPT Ecology
Waste Management Plan	Swansea University
Green Infrastructure Strategy	Fenton and Reece
Air Quality Impact Assessment	Air Quality Solutions

1.5 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:** outlines the relevant planning policy context, at both the national and local level.
- **Section 5:** addresses the key planning considerations associated with the development proposal.

- **Section 6:** provides a conclusion regarding the overall acceptability of the application.

2.0 Site Description

The Site & Surroundings

- 2.1 The Application Site comprises a brownfield parcel of land and currently is easily distinguishable in two distinct parcels north and south of a highway which runs central to the site. The site is located to the south of Port Talbot Town Centre and almost immediately south of Port Talbot Train Station.

Land Use

- 2.2 The site is in a strategic location, the area has excellent infrastructure links, such as Port Talbot Parkway Station and M4 motorway nearby. The area also has a mix of commercial establishments and residential accommodation. The site is bound to the north by Harbourside car park, to the east by Harbour Court which is a building in office use, the southern boundary is formed by Harbour Way / the dock and finally immediately west of the site are further undeveloped parcels of land associated with the regeneration allocation alongside employment uses. The site is situated on the grid co-ordinates X:276585 and Y:189446 and comprises a total site area of approximately 2.32ha.

Flooding

- 2.3 A review of the NRW Development Advice Maps shows that the site is predominantly located within flood zone C1 Served by significant infrastructure, including flood defences and part within flood zone B Areas known to have flooded in the past. The flood map for planning demonstrates the site is predominantly located within flood zones 2 and 3 in relation to river flooding and zones 2 and 3 surface water / small watercourses flooding.

Heritage

- 2.4 A review of the Cadw Mapping records show that the site is adjoined by Grade II listed building Harbour Court. The reason for designation is as an early C20 building retaining its external character, for its historic interest as the head offices of a nationally important company, and as the only surviving building of the Port Talbot Steel Company. There are other listed buildings within Port Talbot town centre which are on the opposite side of the train tracks to the site.

Coal

- 2.5 A review of the coal authority mapping shows the site is within a coal mining reporting area but is not within a development high risk area.

Local Development Plan

2.6 The NPTCBC Local Development Plan (LDP) shows that the site is within the settlement limits for Port Talbot (SC1), a Coastal Corridor Strategy Area (SP5), Harbour Side Regeneration Area (SRA2), and an Employment Allocation EC1/4 B1 Use. Port Talbot Parkway train station is located only 65m north of the site and immediately adjacent is a public footpath connection which could be connected to the site. On the Port Talbot town centre side of the railway track is a bus depot and is the starting point for Port Talbot Town Centre as defined by the LDP.

Access

2.7 Port Talbot is well-connected by roads, with M4 motorway nearby, making it accessible by car. Additionally, there's a Port Talbot Parkway railway station, providing train services to Swansea, Cardiff and London. Local buses further facilitate movement within the town and nearby areas. National Cycle Route 4 is located closely to the southern boundary of the site and is a long distance route between London and Fishguard via Reading, Bath, Bristol, Newport, Swansea, Tenby, Haverfordwest and St. Davids. There is significant existing and proposed cycling infrastructure in the area as shown on the Active Travel Network Maps:

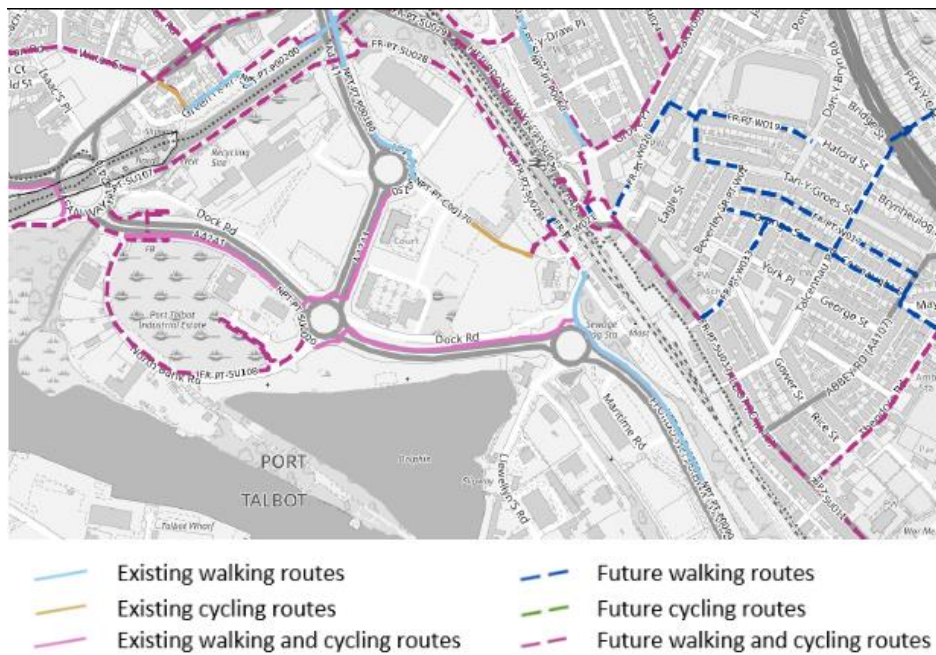


Figure 1: Active Travel Network Map

Planning History

2.8 A review of NPTCBC's online planning history record has identified the following planning applications of relevance to the Application Site:

- P2024/0155 - Request for Screening Opinion under Regulation 6 of the Town and Country Planning (Environment Impact Assessment) (EIA) (Wales) Regulations 2017 for the Construction of a new building comprising offices, research and development and light industry (B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant, substation, sprinkler store, gas store and associated works – *Not an EIA Development 20th March 2024.*
- P2022/0823 - Details to be agreed in association with conditions 6 (verification) and 12 (road safety audit - stages 1, 2 and 3) of application P2020/0294 granted 15/04/20 – *Approved 11th November 2022.*
- P2021/0569 - Details pursuant to the discharge of conditions 5 (site investigation and remediation) of planning permission P2020/0294 granted on 05/10/2020 – *Approved 20th July 2021.*
- P2020/1014 - Details pursuant to the discharge of conditions 5 (site investigation and remediation) and 6 (verification) of planning permission P2020/0294 granted on 05/10/2020 – *Approved 21st April 2021.*
- P2021/0073 - Details pursuant to the discharge of conditions 4 (Construction Environmental management Plan) of planning permission P2020/0294 granted on 05/10/2020 – *Approved 26th February 2021.*
- P2021/0072 - Non-material amendment to application P2020/0294 to vary the wording of conditions 5 (Site investigation/Remediation), 6 (verification), to allow the submission of the details prior to the construction of the road; and to vary the wording of Condition 13 (surface Water/Land drainage) to allow surface water into the highway surface water network – *Approved 26th February 2021.*
- P2021/0201 - Details pursuant to the discharge of conditions 3 (Notice of commencement of development) of planning permission P2020/0294 granted on 05/10/2020 – *Approved 26th February 2021.*
- P2021/0124 - Details pursuant to the discharge of conditions 9 (Landscaping and biodiversity mitigation measures) 10 (Landscape management plan) of planning permission P2020/0294 granted on 05/10/2020 – *Approved 24th February 2021.*
- P/2020/1006 - Details pursuant to the discharge of conditions 7 (method statement and risk assessment for the protection of the structural condition of the water main assets) and 8 (Tata pipe diversion) of planning permission P2020/0294 granted on 05/10/2020 (additional info received 06/11/20) – *Approved 1st December 2020.*

- P2020/0294 - Construction of an access road, flood mitigation works, land contamination remediation works, improving the load capacity of the ground and associated works to facilitate the regeneration of a former brownfield land for future commercial development. (additional information relating to water main and flooding) – *Approved 5th October 2020.*

Pre-application Enquiry

- 2.9 It should be noted also that a pre-application enquiry for the construction of a new building comprising offices, research and development and light industry (B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant, substation, sprinkler store, gas store and associated works at the same application site was submitted to NPTCBC on 21st February 2024. Following the submission a meeting took place March 2024 with a written response received 12th September 2024.

EIA Screening

- 2.10 A request for an EIA screening opinion was submitted to NPTCBC and received on 4th March 2024 in relation to the following development proposal at the Application site: *"request for Screening Opinion under Regulation 6 of the Town and Country Planning (Environment Impact Assessment) (Wales) Regulations 2017 for the Construction of a new building comprising offices, research and development and light industry (B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant, substation, sprinkler store, gas store and associated works."* (Application Ref. P2024/0155). The NPTCBC's Screening Direction issued on 20th March 2024 indicates that the development is not an EIA development and that the application need not be accompanied by an environmental statement.

3.0 Development Proposals

Background

- 3.1 The new facility is a collaborative innovation centre working with academia, namely Swansea University as a key stakeholder to help end users from the steel and an End User from industry to develop and deploy new technologies, products and processes to help move the steel industry move towards a net zero carbon future. The core theme of the SWITCH (South Wales Industrial Transition from Carbon Hub) programme is to assist decarbonisation of the steel and metals industry, to strengthen collaboration between industry and academia and to future proof the steel and metals industry in Wales and the UK.
- 3.2 The scheme is to achieve Net Zero Carbon targets in Construction and Operation as set out in the Works Information and a BREEAM Excellent rating. Swansea University will relocate from their existing facility located at Room 42 Talbot Building, Singleton Campus, Swansea University, Swansea, Wales, SA2 8PP. The current facility is referred to as SAMI (steel and metals innovation). Further information is on their website here: <https://www.samiswansea.co.uk/>
- 3.3 The building is to act as a demonstrator for the UK manufacturing sector, with a large emphasis on the UK Steel Industry, utilising as far as possible steel and other materials produced by the UK steel supply chain and other UK produced materials.

Proposed Use of the Building

- 3.4 It is proposed that the brownfield site is redeveloped to include a new building comprising offices, research and development and light industry (B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant, substation, sprinkler store, gas store and associated works.
- 3.5 The building will be a SAMI a research facility with processes that are bespoke but relatively small scale. SaMI is an open access facility established at Swansea University to deliver practical research solutions to support steel innovation within the industry. This is achieved this through a combination of SaMI's expertise and equipment capability. Academic experts and industrial technologists design and implement bespoke research to provide practical innovative solutions with the ultimate aim of supporting the innovation and decarbonisation of the industry.

- 3.6 The building will have – welding and workshop capabilities that will support the core research elements rig manufacture, sample preparation. Similar to a small fabrication workshop, offices to house university staff, industrial co-located staff and visiting industrialists and academics – standard office work and meetings spaces.
- 3.7 More specifically, the proposed building can be split into the following key areas:
- **Pilot Area and store** – The pilot area is a large two-storey space housing the metals processing equipment required to make small scale (50kg) alloy batches of research interest via vacuum induction melting, small rolling mill and other research scale industrial metals processing (metallic feedstock sorting and technology to enhance this activity). Most of the equipment is used to develop, manufacture and assess small batch alloys for material properties and manufacturing process research and development. The store is for work in progress materials and samples, mostly metallic substrates with some consumables required for the operation.
 - **Welding and Workshop** – supporting activities relating to sample preparation, testing rig and assessment capability manufacture. Essentially there to support the research by have an ability to design and develop or modify existing equipment in house to the required designs and specifications.
 - **Mechanical testing** – a suite of capability designed to test the new and existing alloys for material performance and longevity in use, utilising a range of mechanical testing equipment.
 - **Sintec** – This is a custom designed suite of capabilities to enable the testing of materials in harsh environments. Utilising specialised cabinets and test regimes for high temperature and high-pressure atmospheres in hydrogen or other relevant gaseous environments.
 - **Material characterisation** – an analytical capability to look at the microstructure, chemical properties and surface characteristics of the materials and processes in use. utilising microscopes, SEM and elemental analysis and some wet chemistry capability.
 - **SEM room** – Housing a high magnification Field Effect Scanning electron microscope and ancillary equipment, part of the overall materials characterisation capability.
 - **Office spaces, meeting areas and Welfare** - To support the strong industrial collaborative requirements of the project to house both university and industrial researchers and enable

the bringing together of the required process expertise to rapidly accelerate the progress of materials development.

3.8 In terms of research capabilities, a SaMI facility has specific steel and metals capabilities and expertise in:

- Bespoke testing & evaluation in extreme environments (takes place in the SINTEC area, includes hydrogen atmospheres, high temp and high pressure environment);
- Innovative and effective alloy and downstream pilot scale product and process development (takes place predominantly in Pilot area – vacuum induction melting and small batch alloy manufacture (kg’s not tons), small scale rolling mill and run out table);
- Product characterisation (Materials characterisation lab – mainly analytical techniques such as SEM, Microscopes, Spectroscopy and metallographic preparation);
- Fatigue, fracture and annealing analysis (tensile and fatigue testing of materials, at various sizes – from 1mm dogbones to long steel sections (2 to 3 m long with 20 to 30cm cross section));
- Product and process integrity testing of materials (makes use of the characterisation and testing capabilities to assess suitability and lifetime testing; and
- Due to the flexibility of the approach and ability to create bespoke research, SaMI has the potential to more broadly support industry sectors in research and innovation focused on decarbonisation. (essentially means they can use a combination of existing and new testing methodologies to suit the industry requirements using the workshop and welding equipment).

Employment Numbers & Opening Hours

3.9 In terms of the proposed number of employees, a total of 95no. employees are proposed. Out of the 95, 80no. are to be office-based working hybrid 2 to 3 days in the office on a weekly basis and the remaining 15no. are to be operational staff for the facility. As for operating hours, the building is expected to be open Monday to Friday during normal business hours. For further detail in this respect please see page 7 of the accompanying Design and Access Statement.

Access

3.10 The 2 existing access points are to be maintained to offer a primary and secondary access to the site. The access to the west of the site will provide a deliveries and collections access only and maintains the

main access to the east for all other purposes and the primary gateway to the facility.

- 3.11 Staff parking is located to the north of the building a Staff entrance within the Atrium Stair Core. Visitor parking located in front of the main entrance. Suitable split of Disabled Parking, EV Charging and Able Parking bays is to be provided. Total number of car parking spaces to be provided is 93 including EV charging and disabled spaces.
- 3.12 In terms of active travel, the facility is to promote active/net zero travel by providing cycle storage and shower facilities, plus electric charge points. Pedestrian access to the main entrance of the building is connected from the public footpath and Port Talbot Parkway Station. The site is surrounded by existing pedestrian and cycle routes that allow the node of connection into the site to be utilised for active travel which is encouraged by Neath Port Talbot.

Character

- 3.13 The proposal responds to the character of the site and surrounding context while maintaining the purpose of the build. The purpose of SWITCH is to create a research and testing facility in which collaboration between Swansea University and relevant industry partners can participate. The locality to the Port Talbot Tata Steel Works and expression of steel within the design highlights the relevance of the work being completed in the building. Additionally, to the expression of steel within the building materiality, the decarbonising vision for the research being carried out continues with the base build of Net Zero Carbon Targets, expressed through the extent of Roof and Facade mounted PV panels to achieve these targets.
- 3.14 Key design characteristics:
- Colour palette and materiality that responds to adjacent buildings, but maintains a unique point of interest for the SWITCH proposal.
 - Vertical Metal Fin features break up the Horizontality of the building and create a flagship building for the site.
 - Exposed Steel Structure through translucent materials used within the design.
 - Materiality of the proposal responds to the Steel Industry connections as a building to showcase steel design capabilities.
 - Net Zero Carbon Base Build with BREEAM Excellent design targets.

- Utilisation of South and West Facing Facades for mounted PV.

Landscaping & Biodiversity

- 3.15 The restoration of brownfield sites is an opportunity to create contrast, interest and sense of place. Apart from the building and associated car parking and outbuildings, the remainder of the site is not to be occupied by built form or hard landscaping. Instead, the site is to be developed to create biodiversity buffers and enhancement.
- 3.16 The aim is to reinstate the native landscape character, by drawing inspiration from the Crymlyn Burrows Site of Special Scientific Interest (SSSI) at the Bay Campus, to provide:
- New native woodland planting;
 - New SUDS floodplain meadows; and
 - New wildflower margins.

4.0 Planning Policy Context

Introduction

4.1 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. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
- NPTCBC Local Development Plan 2011-2026 (adopted January 2016).

4.2 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;
- NPTCBC Supplementary Planning Guidance.

4.3 This section of the Planning Statement provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this application. For ease of reference, this overview is set out below at the national and local level.

National Level

The Well-Being of Future Generations (Wales) Act 2015

4.4 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*”. The Act sets out seven ‘well-being’ goals as follows:

- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.

- A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

4.5 Within the Act, sustainable development is defined 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”*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

National Development Framework: Future Wales – The National Plan 2040

4.6 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.

4.7 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 Page 52 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

- 4.8 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*

- 4.9 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).

- 4.10 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).

Placemaking

4.11 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”*.

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

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

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.

Biodiversity and Green Infrastructure

4.13 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).

4.14 In addition, 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).

4.15 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

4.16 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).*

4.17 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).*

Planning Policy Wales Edition 12

4.18 Planning Policy Wales (PPW) Edition 12 was published on 24th 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.

4.19 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”.*

4.20 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

- 4.21 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”*.
- 4.22 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”*.
- 4.23 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”*.
- 4.24 A set of ‘national sustainable placemaking outcomes’ are outlined within PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:
- *Creating and Sustaining Communities*
 - *Enables the Welsh language to thrive*
 - *Appropriate development densities*
 - *Homes and jobs to meet society’s needs*
 - *A mix of uses*
 - *Offers cultural experiences*
 - *Community based facilities and services*
 - *Making Best Use of Resources*
 - *Makes best use of natural resources*
 - *Prevents waste*
 - *Prioritises the use of previously developed land and existing buildings*
 - *Unlocks potential and regenerates*
 - *High quality and built to last*
 - *Maximising Environmental Protection and Limiting Environmental Impact*
 - *Resilient biodiversity and ecosystems*

- *Distinctive and special landscapes*
 - *Integrated green infrastructure*
 - *Appropriate soundscapes*
 - *Reduces environmental risks*
 - *Manages water resources naturally*
 - *Clean air*
 - *Reduces overall pollution*
 - *Resilient to climate change*
 - *Distinctive and special historic environments*
- *Growing Our Economy in a Sustainable Manner*
 - *Fosters economic activity*
 - *Enables easy communication*
 - *Generates its own renewable energy*
 - *Vibrant and dynamic*
 - *Adaptive to change*
 - *Embraces smart and innovative technology*
- *Facilitating Accessible and Healthy Environments*
 - *Accessible and high-quality green space*
 - *Accessible by means of active travel and public transport*
 - *Not car dependent*
 - *Minimises the need to travel*
 - *Provides equality of access*
 - *Feels safe and inclusive*
 - *Supports a diverse population*
 - *Good connections*
 - *Convenient access to goods and services*

4.25 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”*.

4.26 The implications of COVID are highlighted in PPW 11 with 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”*.

Good Design

4.27 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”.

- 4.28 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”.*
- 4.29 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”.*
- 4.30 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”.*
- 4.31 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

- 4.32 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”.*
- 4.33 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”.*
- 4.34 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

- 4.35 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

- 4.36 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

- 4.37 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.5 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, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places”*.

Sustainable Drainage Systems (SuDS)

- 4.38 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

- 4.39 The following Technical Advice Notes (TANs) are of relevance to the development proposal.
- 4.40 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*
- 4.41 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.

Local Level

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

4.42 The NPTCBC Local Development Plan (LDP) was adopted in January 2016. Within the adopted NPTCBC LDP the application site is located within the boundary of settlement limits of Port Talbot (SC1). In addition, the site is within a Coastal Corridor Strategy Area (SP5), Harbour Side Regeneration Area (SRA2) and an Employment Allocation for B1 Use (EC1/4). As such, the overall principle of development is established as acceptable, subject to detailed considerations and accordance with LDP policies and adopted SPG.

4.43 With regards to LDP policies of relevance to the proposed development, the following table provides a summary of policies from the adopted NPTCBC LDP which are of relevance to the determination of the application

LDP Policy Reference	Relating to
SP1	Climate Change
SP2	Health
SC1	Settlement Limits
SP5	Development in the Coastal Corridor Strategy Area
SRA2	Harbourside Strategic Regeneration Area
SP11	Employment Growth
EC1	Employment Allocations
SP15	Biodiversity and Geodiversity
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
SP16	Environment Protection
EN8	Pollution and Land Stability
SP18	Renewable and Low Carbon Energy
RE1	Criteria for the Assessment of Renewable and Low Carbon Energy Development
SP19	Waste Management
W1	Waste Management in New Development
SP20	Transport Network

TR2	Design and Access of New Development
SP21	Built Environment and Historic Heritage
BE1	Design

4.44 Those LDP policies of key importance are discussed in detail below.

Policy SP1 – Climate Change

4.45 *“The causes and consequences of climate change will be addressed by implementing the following measures. In relation to the causes of climate change:*

- 1. The efficiency and sustainability of the County Borough’s settlements will be enhanced through developing more cohesive and efficient settlements and settlement patterns, and consequently more sustainable travel patterns;*
- 2. Greenhouse gas emissions from transport will be minimised through encouraging freight / commercial transport by alternatives to road (e.g. rail or sea);*
- 3. Dependence on the private car and the need to travel in general will be reduced through promoting alternative means of transport and more efficient use of existing facilities, co-location and joint use of facilities;*
- 4. Provision will be made for the County Borough’s appropriate contribution to renewable and low carbon energy generation.*

In relation to the consequences of climate change:

- 1. Likely increased food risk will be taken into account and addressed by ensuring that there is greater resilience by avoiding development on land that is at risk from flooding in the first instance in accordance with the sequential approach set out in national guidance or in locations that could increase the risk of flooding elsewhere;*
- 2. The fragmentation of habitats will be minimised and opportunities made for habitat and species change and migration where possible.”*

Policy SP2 - Health

4.46 *“The following measures will be taken in relation to the high levels of poor long term health and sickness in Neath Port Talbot:*

- 1. The development of sustainable, safe and confident communities will be promoted through the colocation of jobs and facilities and the development of community facilities and services in accordance with the settlement framework;*
- 5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates.”*

Policy SC1 – Settlement Limits

4.47 *“Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.”*

Policy SP5 – Development in the Coastal Corridor Strategy Area
4.48 *“In the Coastal Corridor Strategy Area, sustainable growth and development will be promoted to benefit the County Borough as a whole, while protecting and enhancing the area’s character and environment. This will be achieved through the following area-specific measures:
2. Allocating Strategic Regeneration Areas at Coed Darcy (Neath) and Harbourside (Port Talbot)”*

Policy SRA2 – Harbourside Strategic Regeneration Area
4.49 *“A Strategic Regeneration Area is designated at Harbourside, Port Talbot for a mixed-use development comprising the following allocations:
EC1/4 – Employment – 7ha”*

Policy SP11 – Employment Growth
4.50 *“Existing employment uses will be supported and safeguarded and new and expanding employment developments will be encouraged through the following measures:
1. 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; 2. Additional employment provision will be made within the Strategic Regeneration Areas as part of mixed use, sustainable development in these locations;
3. Existing employment areas will be safeguarded for employment uses;
4. Premises in existing appropriate lawful employment use will be safeguarded for employment purposes;
5. Employment uses will be encouraged in principle within settlement limits;
6. 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”*

Policy EC1 – Employment Allocations
4.51 *“The following sites are allocated for employment uses:
EC1/4 - Land within Harbourside SRA - 7ha - B1”*

Policy SP15 – Biodiversity and Geodiversity
4.52 *“Important habitats, species and sites of geological interest will be protected, conserved, enhanced and managed through the following measures: 1. The identification of the following Internationally and Nationally designated sites within the County Borough to enable their protection: (a) Special Areas of Conservation (SACs) and Ramsar Sites; (b) Sites of Special Scientific Interest (SSSIs); (c) National Nature Reserves (NNRs). 2. The identification and protection of sites of*

regional and local importance; 3. The protection of important natural heritage features”

Policy EN6 – Important Biodiversity and Geodiversity Sites

- 4.53 *“Development proposals that would affect Regionally Important Geodiversity Sites (RIGS), Local Nature Reserves (LNRs), Sites of Interest for Nature Conservation (SINCs), sites meeting SINC criteria or sites supporting Local Biodiversity Action Plan (LBAP) or S42 habitats or species will only be permitted where:*
- 1. They conserve and where possible enhance the natural heritage importance of the site; or*
 - 2. The development could not reasonably be located elsewhere, and the benefits of the development outweigh the natural heritage importance of the site.*
- Mitigation and/or compensation measures will need to be agreed where adverse effects are unavoidable.”*

Policy EN7 - Important Natural Features

- 4.54 *“Development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds will only be permitted where:*
- 1. Full account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; or*
 - 2. The biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.”*

Policy SP16 – Environmental Protection

- 4.55 *“Air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures:*
- 1. Ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels;*
 - 2. Giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable;*
 - 3. Ensuring that developments do not increase the number of people exposed to significant levels of pollution.”*

Policy EN8 – Pollution and Land Stability

- 4.56 *“Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to the following will not be permitted:*
- Air pollution;*
 - Noise pollution;*
 - Light pollution;*
 - Contamination;*

- Land instability;
- Water (including groundwater) pollution.

Proposals which would create new problems or exacerbate existing problems detailed above will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level."

Policy SP18 – Renewable and Low Carbon Energy

4.57 *"A proportionate contribution to meeting national renewable energy targets and energy efficiency targets will be made while balancing the impact of development on the environment and communities. This will be achieved by:*

1. *Encouraging where appropriate, all forms of renewable energy and low carbon technology development;*
2. *Encouraging energy conservation and efficiency measures in all new major development proposals;*
3. *Ensuring that development will not have an unacceptable impact on the environment and amenity of local residents."*

Policy RE1 - Criteria for the Assessment of Renewable and Low Carbon Energy Development

4.58 *"Proposals for renewable and low carbon energy development will only be permitted subject to the following criteria:*

4. *All renewable energy or low carbon energy development proposals will be required to demonstrate that:*
 - (a) *Measures have been taken to minimise impacts on visual amenity and the natural environment;*
 - (b) *There will be no unacceptable impacts on residential amenity;* (c) *The development will not compromise highway safety;*
 - (d) *The development would not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services communications; and*
 - (e) *There are satisfactory proposals in place for site restoration as appropriate"*

Policy SP19 – Waste Management

4.59 *Provision will be made for the delivery of an integrated network of waste management facilities through the following measures:*

2. *Identification of preferred sites for in-building waste treatment capacity;*
4. *Ensuring that provision is made for the sustainable management of waste in all new developments."*

Policy W1 – In-Building Waste Treatment Facilities

4.60 *"Proposals for the treatment, processing, storage and distribution of waste will only be permitted where all of the following criteria, where relevant, are satisfied:*

- (a) The proposal reflects the priority order of the waste hierarchy as far as possible;*
- (b) The proposal is carried out within a purpose built or appropriately modified existing building, unless it can be demonstrated that part or all of the proposed operation can only be carried out in the open;*
- (c) It can be demonstrated that the development would not compromise highway safety;*
- (d) It is demonstrated that measures can be taken to reduce, and where possible avoid, damage or disturbance to the environment and the amenity of neighbouring land uses or individual properties to acceptable levels;*
- (e) Appropriate, acceptable site management proposals are submitted for the duration of the development;*
- (f) The proposal is supported by an appropriate Waste Planning Assessment."*

Policy SP20 – Transport Network

- 4.61 *"The transport system and infrastructure will be developed in a safe, efficient and sustainable manner through the following measures:*
- 1. Implementing key transport projects and supporting schemes identified in the Joint Transport Plan;*
 - 2. Promoting connectivity and access to public transport through improving bus and rail facilities;*
 - 3. Supporting enhancements to the walking and cycling network;*
 - 4. Promoting park and share schemes along key highway routes;*
 - 5. Promoting efficient use and links to the transport network through the identification of a road hierarchy;*
 - 6. Restricting development which would have an unacceptable impact on highway safety;*
 - 7. Requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport;*
 - 8. Requiring appropriate parking provision;"*

Policy TR2 – Design and Access of New Development

- 4.62 *"Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:*
- 1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;*
 - 2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;*
 - 3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;*
 - 4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation."*

Policy BE1 - Design

- 4.63 *“All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. 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;*
 - 5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;*
 - 6. 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);*
 - 7. 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;*
 - 8. It uses resources, including land and energy, as efficiently as possible through:
 - (a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;*
 - (b) The layout and form of the development does not preclude the reasonable use of other adjacent land;*
 - (c) Developing brownfield land in preference to greenfield land where possible;*
 - (d) Minimising building exposure while maximising solar gain.**
 - 9. Its drainage systems are designed to limit surface water run-of and food risk and prevent pollution;*
 - 10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.”*

Supplementary Planning Guidance

4.64 The following Supplementary Planning Guidance (SPG) adopted by NPTCBC is of relevance to the proposed development:

- Port Talbot Harbourside & Town Centre Development Framework SPG (September 2019);
- Parking Standards (October 2016);
- Design (July 2017);
- Renewable and Low Carbon Energy in New Development (July 2017);
- Biodiversity and Geodiversity (May 2018);
- Pollution (October 2016); and
- Planning Obligations (October 2016).

5.0 Appraisal

Overview

- 5.1 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.
- 5.2 The key material considerations of relevance in the determination of the application are as follows:
- Principle of Development
 - Design
 - Flooding
 - Ecology
 - Heritage Impact Assessment
 - Transport
 - Ground Conditions
 - Waste Management
 - Energy
 - Air Quality
 - Noise

The Principle of Development

- 5.3 The Application Site is located within the boundary of the defined settlement limit of Port Talbot as demonstrated on the LDP Proposals Map. The principle of development is established as acceptable within the boundary of settlement limits (subject to detailed design and material considerations). As such complies with policy SC1 (Settlement Limits).
- 5.4 In addition, the site comprises previously development land. The use of the site as proposed presents a highly efficient redevelopment of brownfield land within settlement limits, positioned within a highly sustainable location. Planning policy at all levels encourages the efficient use of such sites in preference to greenfield land, and as such, it is considered that the principle of the proposed development is acceptable. At the local level, the proposals supports policy SP5 and SRA2, which seeks regeneration at Harbourside, and policy and EC1/4, which refers to the 7 hectares of employment land.

5.5 The proposals are also in accordance with the Welsh Government's overarching national growth strategy – the site is located within a Growth Area ("Swansea Bay"), as identified in Future Wales. Furthermore, Policy 33 of Future Wales states that "*strategic and local development plans should recognise that the growth area should be the focus for strategic economic and housing growth and for essential services and facilities*".

5.6 The pre-application response confirms that in principle, the development is considered to be acceptable and states:

"In light of the above policies contained within the Local Development Plan, the application site is located within settlement limits, is an allocated Strategic Regeneration Area and is an allocated employment site for B1 use. As such the proposed development for the construction of Research and Development Centre is considered to be acceptable in principle."

5.7 Overall the principle of development is considered to be established and the proposals will deliver development on an allocated regeneration site in accordance with policies Coastal Corridor Strategy Area (SP5), Harbour Side Regeneration Area (SRA2) and an Employment Allocation for B1 Use (EC1/4).

Design

5.8 The architects have developed the design of the site to consider the space requirements for the occupier of the building alongside the site characteristic and constraints. The positioning of the building has been informed by the surrounding built context and it is considered that the principle elevation should face towards the town centre. The flooding at the site has also informed the positioning of the building.

5.9 Given the site is allocated for an employment use and in a strategic regeneration area there are limited sensitive uses nearby the site. The nearest residential properties are to the north / north east on the opposite side of the railway. Nearest the site to the east is a building in office use with more recently developed employment uses to the west. Overall, it is considered that the proposals will have no detrimental impact towards amenity of surrounding neighbours. Visually it is considered the proposals will have a benefit to the area. Currently the site comprises an undeveloped brownfield plateau which has minimal visual merit for the area. The site is engineered for future development.

5.10 It is noted that Harbour Court to the east of the site is Grade II listed. The reason for designation is as an early C20 building retaining its external character, for its historic interest as the head offices of a

nationally important company, and as the only surviving building of the Port Talbot Steel Company. The character of the area is largely defined by Port Talbot Town Centre with the railway line being prominent in the landscape. There are extensive areas of industrial and light industrial uses with newer employment buildings in the Harbourside allocation also having been developed. Overall, the proposals will contribute to the regeneration of the area and are considered to have a positive impact. The setting of the listed building is already defined by various built developments in the area and the proposals do not deviate from this setting.

- 5.11 In terms of policy compliance, the proposal, in line with LDP Policy BE1 (Design), complements the area and with careful attention to siting, appearance and scale enhances the visual aspects of the locality. In addition, as set out in Section 4 of this statement, the concept of placemaking forms a key consideration at all levels of planning policy. At the national level, for example, 'Future Wales – The National Plan 2040' highlights that the growth of urban areas *"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"*. Through Green Infrastructure and the landscaping of the site, the scheme will be more resilient to climate change, in accordance with LDP Policy SP1 (Climate Change). The landscape strategy is to be delivered using low-carbon materials and build methods, sustainable drainage systems are to be an integral part of the design, and walking and cycling are to be promoted.
- 5.12 The scheme is to achieve Net Zero Carbon targets in Construction and Operation as set out in the Works Information and a BREEAM Excellent rating.
- 5.13 The pre-application response confirms that the proposed scale and massing of the building would respect the context of the site and its location within Harbourside. The response also confirms in principle the material finished shown within the submitted documents is not considered to appear out-of-keeping with the immediate locality or the wider Harbourside Regeneration Area.
- 5.14 In conclusion the proposals will deliver a modern facility that is highly efficient and sustainable providing space for a collaborative innovation centre working with academia and industry partners to develop and deploy new technologies, products and processes to move towards a net zero carbon future

Flooding

- 5.15 The Natural Resources Wales' Development Advice Map zone classification of a site is used to trigger different planning actions based on a precautionary assessment of flood risk. Zone C1 is described as areas of the floodplain which are developed and served by significant infrastructure, including flood defences.
- 5.16 On the Flood Map for Planning the entirety of the site is located within Flood Zone 3 from fluvial sources, there is a minor encroachment of Flood Zone 2 into the Southeastern boundary of the site from the sea, and the vast majority of the rest of the site is within Flood Zone 2 of an area at risk of Surface Water or Small Watercourse flooding. The site is not within a TAN15 Flood Defended Zone.
- 5.17 The accompanying Flood Consequence Assessment (JBA, March 2024) to support the planning application for the proposal concludes that with appropriate design and flood mitigation measures the site can satisfy all the necessary requirements, such as:
- The proposals have been developed with care to including measures to manage and mitigate the risks of flooding. These measures including, raising Finished Floor Levels (FFL) to 7.9mAOD, rising site levels to 7.7mAOD, lowering areas along the southern and southeastern boundary to a maximum level of 6.8mAOD, and increasing the number of flood relief culverts under Harbourside Way from 3no. to 5no.
 - Detailed hydraulic modelling has been used to assess the risk of fluvial flooding to the site. This demonstrates that the proposed building will be flood-free in the post-development 1% AEP plus climate change fluvial event. Ancillary car parking areas and internal roads are predicted to flood to depths of less than 0.3m. Such flooding is unavoidable without causing an increase in flood risk elsewhere. As such, in line with NRW guidance for ancillary areas, the proposals satisfy the requirements of A1.14 of TAN15.
 - During the post-development 0.1% AEP event the building is predicted to flood to a maximum flood depth of 210mm. Ancillary areas flood risk depths no greater than 600mm. Flooding greater than this is only predicted in areas of designated flood storage and conveyance. As such, the proposals comply with the requirements of A.15 of TAN15.
 - It is recommended that the building management sign up NRW's Flood Warning Service and that a Flood Response Plan is prepared to ensure that future occupiers of the site

are aware of the flood risk and recommended flood risk management actions.

- 5.18 The FCA concludes that with appropriate design and flood mitigation measures the site satisfies all the requirements of the Justification Test and Acceptability Criteria in compliance with the aims and objectives of Planning Policy Wales and TAN-15.

Biodiversity and Landscape

- 5.19 The site is over 5km from the nearest statutory designated sites at Margam Moors SSSI, Eglwys Nunydd Reservoir SSSI and Crymlyn Burrows SSSI. A number of water-based sites that meet the criteria as Sites of Importance for Nature Conservation (SINC) are however within 300m. A large number of records for protected and priority species within 1km of the site were reported as part of the desk study, some of which were considered to have potential to be present on site.

- 5.20 The site has a history of ecology surveys and mitigation associated with a previous planning application ref. P2020/0294. The historic ecology surveys have been submitted with the application including the extended Phase 1 habitat survey. The historic surveys originally found that the meet the criteria as a SINC for Open Mosaic Habitats on Previously Developed Land (OMHPL). The survey also noted Small Blue, a protected butterfly species, which is a primary indicator for SINC status. The site was also the subject of a Reptile survey (where a small population of Slow worm was recorded) and has been assessed in relation to suitability for other species, and particularly noted potential for invertebrates such as Shril Carder Bee.

- 5.21 The site was cleared of vegetation in 2020 and appropriate measures were undertaken to protect reptiles. A number of mitigation measures, including habitat replacement, seeding and planting of plug plants along with habitat manipulation methods for reptiles were proposed to offset the reported likely impacts. The scheme also increased the ecological value of the area through removing non-native invasive species, planting/seeding species into areas which are currently un-vegetated (road/hard standing) to attract invertebrates and birds, plus providing reptile refugia/hibernaculum. Two mitigation areas were established to mitigate for the habitat loss caused by the enabling works. Overall, there was an increase in SINC quality habitat in the area. The habitat creation proposals were undertaken at the same time as the completion of the enabling works at the site.

- 5.22 The proposed development does not fit within the development platforms that were originally constructed and which the biodiversity

mitigation was designed and planted around. As this development is happening relatively soon after the construction of the original site with the development platforms, it is not considered that there will be a significant short- or long-term loss of SINC quality habitat as a result of this development.

- 5.23 More specifically, there will be a loss of the verges which have been planted up as wildflower verges as well as some of the SUDs features. Part of the mitigation planting will remain untouched during development. The loss of verges which will occur will be mitigated for by the mitigation meadow seed areas. The same species mix will be used as was used in the original mitigation areas. Additional SUDs features will be implemented on the site and these will be appropriately planted up. All landscaping and species mixes used on the site will be pollinator friendly and appropriate to the site, its previous SINC status to ensure that there is no loss of habitat in the wider area. A Biodiversity Mitigation Strategy will be developed for this site to ensure long term success of the habitats that will be created.
- 5.24 The application is supported by a Landscape Plan and Green Infrastructure Strategy (GIS). The GIS considers the baseline position for the site and provides an assessment using the Step Wise approach and DECCA as required by PP12 chapter 6. The main priorities for the site are:
- to retain as much of the existing biodiversity as possible;
 - Enabling a coordinated approach to water management on site and flood mitigation
 - Support identified priority habitats for rare invertebrates
 - Bringing users of the site closer to nature
- 5.25 The GIS includes an assessment of the existing green space within the site comparing what is to be lost and what is to be gained through new planting. The assessment confirms that overall there will be a gain of 8192m² of new planting. As such there will be substantial net biodiversity benefit via the proposals.
- 5.26 In conclusion whilst the site contains areas of ecological mitigation associated with the previous enabling works the proposals within this application will further enhance and provide expansive new planted areas. The proposals therefore comply with PPW12, Future Wales and NPTLDP policies SP15 (Biodiversity and Geodiversity) and EN7 (Important Natural Features).

Heritage Impact Assessment

- 5.27 The pre-application response advises that a Heritage Impact Assessment is required due to the proximity of the Grade II listed Magistrates Court. The response specifically states:

"it is also noted that the site would be located to the west of the old Magistrate Court which is a Listed Building. It is noted that the proposed building would be sited away from the boundary with the Listed Building however a full planning application would be expected to be supported by a Heritage Impact Assessment to assess the potential impact upon the setting of the Listed Building and CADW would also be consulted as part of the application."

- 5.28 Following receipt of the comments Asbri issued a response to the LPA to confirm that Cadw guidance advises that Heritage Impact Statements are not formally required for planning application which impact the setting of a listed building. However it is good practice for an assessment to be undertaken. As such it has been agreed that the Heritage Impact Assessment can be detailed in the Planning Statement as this is proportionate to the site context.

- 5.29 To the eastern site boundary is Harbour Court which is a Grade II listed building ref. 23152. The property was designated in March 2000. The reason for the listing is:

"Listed as an early C20 building retaining its external character, for its historic interest as the head offices of a nationally important company, and as the only surviving building of the Port Talbot Steel Company."

- 5.30 The exterior of the building is described as:

"Neo-Georgian style. Main range with end wings which are advanced to the front. Constructed of red brick in stretcher bond, suggesting double skin construction. Pale stone dressings including plinth and rusticated quoin strips to wings. Hipped tiled roofs with swept eaves, with individual roofs to the main range and each wing. The front of the main range is 7-window while the wings are 3-window. Horned multi-pane sash windows throughout with stone sills and flat gauged brick heads with keystones. Central bay with doorway and stairlight above, flanked by narrow 4-over-4-pane sash windows, under a raised segmental pediment. Doorcase with tapering pilasters, moulded capitals and wide flat cornice, containing double panelled doors with overlight. This supports a pronounced stone tablet which rises to the sill of the stairlight above and reads 'Port Talbot / Magistrates Court.' The round-headed stairlight has a moulded stone surround with ears and large inverted volutes against the jambs. A large fluted and scrolled keystone supports a keyed oculus in the pediment which has moulded

stone drops to the sides. The windows flanking the central bay are 8-over-8-pane sashes, except for the outer ground floor windows which are paired 4-pane sashes. The front elevations of the wings are symmetrical with 8-over-8-pane sashes flanked by 6-over-6-pane sashes, all the windows openings with aprons. Added range to L, with large catslide section and no openings. The N side of the N wing is also 3-window with 8-over-8-pane sashes, but those to the lower storey are not aligned with those above. The L and central lower windows have aprons beneath. The rear is rendered and altered. Flat roofed projection behind main range with lean-to to R. Mainly UPVC windows, irregularly spaced. The added bay to the S end is similar, with flat-roofed projection to rear, probably a staircase bay, and irregular windows."

5.31 The interior of the building is described:

"The interior was altered when the building was converted to a magistrates court, with the addition of partition walls and lowered ceilings. Inside the front entrance is a small stairhall with open-well staircase to the R against the front wall. The timber balustrading consists of a turned baluster between 2 plain uprights to each tread, and a moulded handrail."

5.32 Finally a section on the history of the building is detailed within the listing and states:

"Built as the General Offices of the Port Talbot Steel Company in the early C20. The company was incorporated in 1906 and took over and remodelled the existing works of Messrs Gilbertson of Pontardawe, who had begun in 1901 under the influence of the Port Talbot Railway & Docks Company. The offices are shown on the Ordnance Survey of 1917 surrounded by steelworks buildings and in a publication of c1920. It is little altered from that time except that the S wing was single-storey with parapets, and there was a cupola above the entrance along with some chimney stacks. The boardroom is said to have been downstairs to the L of the entrance. The building was converted to a Magistrates Court in 1988 and opened by Lord MacKay of Glasfern."

5.33 The building and grounds have undergone updates and changes over its years to adapt the building so that it is suitably for office use. Key planning applications and changes are listed below:

- **P2005/1004** Listed Building Application For Alterations To Existing Entrance Ramp And Steps. Approved September 2005.
- **P2017/0826** Demolition of side annex and construction of a two storey, side extension to accommodate a new escape staircase and change of use of remaining building from a former Magistrate Court

(Use class D1) to Office accommodation (Use Class B1), insertion of two ground floor windows and one first floor window, plus alteration of an internal door into an external window (Following demolition); replacement natural finish zinc roof with standing seams to rear plant room, together with extension of existing access, turning and car parking and landscape areas. Approved October 2017.

- **P2017/0834** Listed Building Application for the demolition of side annex and construction of a two storey, side extension to accommodate a new escape staircase, insertion of two ground floor windows and one first floor window, alteration of an internal door into an external window (Following demolition); replacement natural finish zinc roof with standing seams to rear plant room, two areas of replacement glassfibre flat roofs, and replacement doors, and replacement slim line double glazing panes to all front windows, removal of external air conditioning unit from rear elevation, together with alterations to existing access, turning, car parking and landscape areas. Plus application of a Renotex type product to external walls, alterations to internal layout including removal of walls, construction of stud partition walls and installation of a frameless glass balustrade on the outside of the existing. Approved January 2018.
- **P2024/0431** Construction of two-storey side extension and external alterations to existing building.

5.34 In considering the above applications it is evident that the Listed Building and its surrounding context have evolved overtime. It is also recognised that the Listed Building is physically within the Harbour Side Regeneration Area (SRA2) and an Employment Allocation for B1 Use (EC1/4). Given the location within these allocations which have been formally adopted through the LDP process it is recognised that the setting of the listed building is going to change over the plan period. The setting of the listed building has therefore changed to a more contemporary character reflective of the changes and developments in the area. The allocation within the LDP recognises that change will take place within the vicinity of the building over time.

5.35 The Listed Building sits to the sites eastern boundary. Along the eastern boundary the proposals will retained areas of ecological mitigation which have been completed during the site enabling work application ref. P2020/0294 alongside additional areas of planting. As such there will not be any significant built forms of development immediately adjacent the listed building boundary. The site then provides areas of car parking with the nearest point of the proposed building situated approximately 57m from the sites eastern boundary. This buffer provides sufficient distance to ensure that the proposals do not appear overbearing to the Listed Building.

- 5.36 The outlook from the Listed Building is significantly defined by various forms of industrial buildings located to the south / south east and looking towards the steel works. To the north is Port Talbot Train Station / town centre and residential properties. To the west is the site alongside blocks of offices more recently developed. The offices are of a similar design and composition to the site proposals and have informed the appearance of the proposed building. As such the proposals are in keeping with existing development in the area completing the setting and context.
- 5.37 In conclusion, the site sits adjacent the Grade II listed 'Magistrates Court' to the east. The setting of the Listed Building is significantly informed by developments in recent years and its location within the Strategic Regeneration Area. The proposals provide a building and development that is in keeping with the existing character and context and therefore the impacts on the Listed Building is considered to be acceptable. The proposals are compliant with PPW12, Future Wales and NPT LDP policies SP21 (Built Environment and Historic Heritage) and supplementary planning guidance.

Highways, Access, and Active Travel

- 5.38 As demonstrated fully within the accompanying Transport Assessment and Travel Plan (Hydrock, March 2024), the site is located within a highly sustainable location being accessible by a variety of transport options, and within walking / cycling distance of a range of facilities via existing and future / proposed active travel routes. In summary:

- Footway and pedestrian crossing provision within the vicinity of the development site is of a good standard. The majority of roads within the vicinity of the proposed development have footway provision on both sides of the carriageway and there are several formal and informal crossing facilities.
- The site is in close proximity to Swansea Bay Cycle Network Active Travel cycle red route is located along Harbour Way and the shared use footway from Harbourside car park to the A4241. This cycle route provides access to cycle routes around Port Talbot to residential areas north of the railway line and along Port Talbot beach at Swansea Bay. A section of the National Cycle Network (NCN) 4 from London to Fishguard goes along A4241 Harbour Way and provides routes west to Swansea and east to Margam County Park. The NCN 887 provides a route between Port Talbot and Afan Forest Park.

- Bus provision within the vicinity of the site is good, with the closest bus stop to the site is Port Talbot Parkway which is approximately 300m away and is accessed via the railway station building and across the railway line. This stop is served by the buses X1, X2, 87 and T1C. There is a high frequency of local and national bus services that serve Port Talbot Bus Station which is located approximately 720m west of the site. National Express services serve the bus station with destinations including London, Birmingham, London Gatwick and Heathrow, Manchester and Nottingham.
- Railway connections via the adjacent Port Talbot Parkway train station are frequent. Regular daily services are available to many destinations in the local region and further afield, such as: Swansea, Chester, London, Carmarthen, Cardiff, Milford Haven, Llanelli and Manchester.

Car Parking

- 5.39 The parking standards for Neath Port Talbot are set out in the NPTCBC LDP Parking Standards, Supplementary Planning Guidance (SPG). A zonal approach to the standards is employed within the SPG with the site falling under Zone 4. Based on the proposed Gross Floorspace Area of 3,688 sqm, in order to comply with the NPT parking standards, a total of 184 car parking spaces would be required at the development.
- 5.40 A 'reduction in parking requirement' calculation is set out in the Parking Standards SPG which allows a reduced level of parking provision, dependant on the number of sustainability points achievable by a development. It has been calculated that the proposed development could achieve a sustainability Score of seven and therefore a 20% reduction can be applied to the car parking requirement as per the 'reductions in parking requirement'.
- 5.41 Once the 20% reduction factor is applied to the parking requirement, the policy compliant level of car parking provision would be 147 car parking spaces. NPTCBC parking standards require that 5% of the overall parking capacity is provided as dedicated disabled parking bays.
- 5.42 The proposed parking provision has been based on the operators experience of the required staffing levels. Therefore, the bespoke approach for the development proposals is to provide a total of car parking spaces within the site. Based on 93 car parking spaces, five disabled parking spaces will be provided in line with NPTCBC parking standards. In addition, nine parking bays will be allocated as Electric

Vehicle (EV) charging. This is an appropriate level of car parking based on the use of the development.

Active Travel

- 5.43 Active travel is promoted as a key objective of the development with dedicated pedestrian/cycle paths created throughout the site, providing safe and attractive active travel routes which draw upon the site's network of existing landscape features and green infrastructure. Pedestrian and cycle access from the site into the surrounding community will be gained directly.
- 5.44 The NPTCBC cycle parking standards are set out within the Parking Standards SPG. The standards relating to B1 offices are 1 stand per 200 square metres for long stay and 1 stand per 1000 for short stay. Based on the current proposed GFA of 3,688 sqm there would be a requirement for the provision of 18 long stay cycle parking spaces and four short stay spaces.
- 5.45 As for pedestrians, there is a high-quality pedestrian infrastructure within the vicinity of the site which is well-maintained, lit and benefits from good natural surveillance. Pedestrian access into the site would be from Oakwood Road via a continuation of the existing footways and a footpath accessed from the internal access road of the site along to Harbourside Road.

Vehicular Access

- 5.46 With regards to site access, as part of the development proposals the recently consented and constructed access road will be closed. It is proposed that the development site will gain access from the existing priority junction with Oakwood Road. This access will be for staff, visitors and refuse vehicles. A delivery access will be located to the west of the site and accessed via Harbourside Road for delivery vehicles and refuse vehicles. Servicing arrangements will be via the proposed vehicular access at the main access to the bin store located to the north of the site and via the delivery access to the west of the site.

Sustainability

- 5.47 The Transport Consultant Hydrock have prepared a Sustainability Report which provides a succinct document summarising the sustainability credentials of the site in relation to transport. The report includes the below tables which demonstrates the facilities within close proximity:

Type	Name	Distance (metres)	Walking Time (mins)	Cycling Time (mins)
Train station	Port Talbot Parkway Railway Station	200	3	1
Bus stop	Port Talbot Bus Station	250	3	1
Shopping	Mandie's Breakfast Van	220	3	1
	Talbot Road inc. Spar / Fast Food	350	4	2
	Port Talbot Town Centre and primary shopping street	400	5	2
	Aberfan Shopping Centre	1000	12	5
	Tesco Superstore	1500	15	7

5.48 It is considered that the proposed level of car parking is sufficient to accommodate the likely parking demand generated by staff travelling to the site, together with promoting the use of sustainable travel in accordance with local and national policy. It is not considered that the proposed development will have a significant impact on the surrounding highway network. The proposals are compliant with PPW12, Future Wales and NPTLDP policies TR2 (Design and Access of New Development) and supplementary planning guidance.

Ground Conditions

5.49 In light of the site's previously developed nature, appropriate geo-environmental surveys have been undertaken. A geo-environmental and geotechnical assessment, comprising a desk study, intrusive investigation, laboratory testing and assessment of data has been undertaken by Hydrock (December, 2023). The Geo-Environmental and Geotechnical Assessment summarises the likely mitigation and remedial measures suitable for the identified contamination and proposed development.

5.50 The remediation works proposed comprises the installation of a clean cover system, installation of a gas vapour membrane and in situ soil stabilisation or treatment of contaminants. The site was previously remediated as part of the enabling works.

Air Quality

5.51 Air Quality Solutions have prepared an Air Quality Assessment (AQA) to support the application. The AQA has been prepared considering the sites proximity to the Air Quality Management Area. Potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of earthworks, construction and trackout activities. It is considered that the use of good practice control measures would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.

- 5.52 Dispersion modelling was undertaken in order to predict annual mean pollutant concentrations across the application site and to predict impacts as a result of additional road vehicle exhaust emissions associated with the proposed development. Results were subsequently verified using local monitoring results provided by Neath Port Talbot Council (NPTC).
- 5.53 The dispersion modelling results indicated that annual mean pollutant concentrations across the application site were below the relevant air quality objectives at proposed sensitive locations.
- 5.54 The university commented that emissions from development processes are minimal, with the biggest emissions being via the use of the reducibility apparatus which releases small quantities CO. There is currently a CO monitor at the top of SAMI that alarms if the level exceeds 30PPM which has never been triggered. Other emissions from the flues relate to the gases used directly on site - all of which (except N2) originate from gas cylinder use within the laboratory areas. This limits volumes of emissions to levels that could be considered insignificant. The largest gas volume is from a nitrogen source, and this is anticipated to be no more than 100l/min for existing usage.
- 5.55 The site is therefore considered suitable for proposed end use without the implementation of protective mitigation techniques.
- 5.56 Additionally, the assessment concluded that impacts on pollutant levels as a result of operational phase pollutant emissions were predicted to be **negligible** at all sensitive locations in the vicinity of the site. The use of robust assumptions, where necessary, was considered to provide sufficient results confidence for an assessment of this nature.
- 5.57 Based on the assessment results the site is considered suitable for the proposed end use subject to the inclusion of relevant mitigation measures to offset excess emissions associated with the development and complies with the Planning Policy Wales, Future Wales and NPTLDP policies SP16 (Environmental Protection) and EN8 (Pollution and Land Stability).

Waste Management

- 5.58 While located offsite, in a similar way to existing offsite facilities, SWITCH harbourside will come under the policies and procedures of the university. Waste handling for other offsite facilities currently form part of the university contract which provides waste data as part of the contract. All chemical and hazardous waste is stored locally in small volumes in bespoke chemical storage containers and collected

by contractors for disposal. A waste management plan has been provided summarising procedures the end user must follow.

Energy

5.59 An Energy and Sustainability Statement accompanies the application and demonstrates that the building is capable of performing to an energy positive standard and is in compliance with LDP policy RE2 relating to Renewable and Low Carbon Energy in New Development.

5.60 The energy requirements and potential energy sources have been considered and discussed for the proposed development of SWITCH Harbourside. The assessments carried out show that the requirements of these policies are satisfied, the overarching requirement of which is compliance with Building Regulations Part L. It has been shown that the implementation of passive design, energy efficient measures and renewable technologies satisfy the energy requirements for the building.

Noise Impact

5.61 A baseline noise survey report to review the soundscape at the site of the proposed development was undertaken by Formant (May 2023). The proposed development contains spaces which will be sensitive to environmental noise intrusion and noise from the proposed building services plant has the potential to affect nearby noise sensitive receptors.

5.62 The ambient sound levels ranged from 51 to 58 dBLAeq, which exceeds the thresholds for natural ventilation for some of the spaces within the proposed development. However, subject to some good acoustic design measures, natural ventilation may be possible for the development. No additional glazing, façade or roof acoustic upgrades are likely to be required.

5.63 The nearest noise sensitive receptors (NSRs) to the site are houses to the north, east and west of the site. Background sound levels at the site were fairly high due to the constant traffic noise from the north, with the lowest 30-minute measurement being 48 dBLA90. Noise data from the Welsh Government's noise mapping indicates that night time noise levels are typically around 5dB lower than daytime at the location of the proposed building, therefore a representative background sound level of 43 dBLA90 has been adopted for assessment of night time noise emissions.

5.64 Plant selections are not known at this stage, but noise emissions limits have been set based on BS 4142 and the BREEAM Pol 05 limit of '5 dB below background', i.e. rating sound levels at nearby receptors should not exceed 43/38 dBLA,r (day/night). It is

considered that these limits are considered achievable with standard plant and attenuation measures.

- 5.65 In light of the above, it is considered that the proposed development is in accordance with LDP Policy EN8 (Pollution and Land Stability) and as such, is acceptable in regard to noise impact on local amenity.

6.0 Conclusion

- 6.1 This Planning Statement has been prepared by Asbri Planning Ltd on behalf of Neath Port Talbot County Borough Council (NPTCBC), in support of a Full Planning Application for the construction of a new building comprising offices, research and development and light industry (B1 use) alongside reconfiguration of the highway, parking, access, landscaping, drainage, plant, substation, sprinkler store, gas store and associated works at land north of Harbour Way, Harbour Side Regeneration Area, Port Talbot.
- 6.2 The site is located within Harbourside Strategic Regeneration Area which is designated to provide mixed use development in the period of the LDP. The proposals will assist in meeting the employment allocation by providing a new building comprising offices, research and development and light industry (B1 use). The new facility is a collaborative innovation centre working with academia, namely Swansea University as a key stakeholder to help end users from the steel and an end user from industry to develop and deploy new technologies, products and processes to help move the steel industry move towards a net zero carbon future.
- 6.3 The site comprises previously developed / brownfield land within settlement limits, which is currently vacant. The site is located within a highly sustainable location within walking and cycling distance of a range of local services and facilities, and is highly accessible by public transport. The use of the site as proposed presents the highly efficient redevelopment of previously developed land within a highly sustainable location. The redevelopment of site is in full accordance with Future Wales which encourages *“sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources”*.
- 6.4 Having regard to the material considerations set out within this Planning Statement, it is considered that the proposed development represents an appropriate and policy compliant scheme. Accordingly, it is respectfully requested that the application is approved.