

Our Ref: B032199

Planning Portal Ref: PP-10355954

Development Control Section

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

14 December 2021

Dear Sir

FULL PLANNING APPLICATION FOR THE PROPOSED TEMPORARY CHANGE OF USE OF THE BAY FIELD HOSPITAL, Ffordd Amazon, Swansea, SA1 8QB, FROM USE CLASS B1 (BUSINESS) / B2 (GENERAL INDUSTRIAL) TO USE CLASS D1 NON-RESIDENTIAL INSTITUTION (FIELD HOSPITAL & CORONAVIRUS TESTING/MASS VACCINATION CENTRE) FOR A PERIOD OF 3 YEARS.

Introduction

On behalf of our client Swansea Bay University Health Board, please find enclosed a full planning application for the proposed temporary change of use the Bay Field Hospital, Ffordd Amazon, Swansea, SA1 8QB from use class B1 (business) / B2 (general industrial) to use class D1 Non-residential institution (field hospital & coronavirus testing/mass vaccination centre) for a period of three years. At the end of the three-year period, or upon cessation of the Class D1 use, the floorspace will return to Class B1/B2 use.

The application submission comprises the following documents:

- Completed application forms and associated ownership certificates;
- This covering letter; and
- Site location plan.

Background

In response to the coronavirus pandemic the application site has been used by the applicant as a coronavirus testing/mass vaccination centre since 21st December 2020. The use of the application site as a coronavirus testing/mass vaccination centre is considered permitted development pursuant to the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2020, which came into force on 10 April 2020. The Amending Order permits NHS bodies to undertake any form of development for the purposes of preventing, controlling or mitigating the effects of, or taking other action in connection with a public health emergency. The Amendment Order 2020 restricts the retention of such development for a period of 12 months, after which a planning application is required.

Subsequently, the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2021 came into force on 21 March 2021, extending the permitted time period in which development could be retained from 12 months to 18 months. Accordingly, the current use remains permitted development until June 2022.

Moving forward the Field Hospital will be required to host additional non-Covid related services and potentially could be required beyond the 18-month permitted development period. Prior to the emergency use as a coronavirus testing/mass vaccination centre, we understand the site was used within Use Classes B1/B2. As such, this application seeks a temporary change of use for a period of three years, from Use Class B1/B2 to Use Class D1 Non-residential Institution (field hospital & coronavirus testing/mass vaccination centre). A temporary change of use is sought in order not to prejudice the longer term continued use of the building within Class B1/B2 after the Class D1 use has ceased.

The Site & Surroundings

Bay Field Hospital is located within the Elba Building of the Fabian Way Employment Area, approximately 3.7 miles east of Swansea city centre. Vehicular access is obtained from Ffordd Amazon, which runs parallel to the site's northern boundary. The unit is served by dedicated car parking facilities which adjoin the unit's western frontage.

A parking court adjoins the unit's western frontage. The access roads serving the Fabian Way Employment Area lies to the north (Ffordd Amazon) and south (Fabian Way). In terms of wider surroundings, an area of agricultural land and woodland is found to the north of the hospital, whilst Swansea University Bay Campus lies 500 meters to the southwest. Further Industrial spaces are situated to the east and west of the hospital.

Planning History

Tetra Tech have undertaken a search of Neith Port Talbot council's online planning register which revealed the following historic planning applications at the subject site:

Application Ref.	Proposal	Decision
P2020/0363	Change of use from Class B2 to Class D1 to facilitate occupation as a scaffolding training centre and external alterations	Approved July 2020

The Proposal

The proposal is for the temporary change of use of the Bay Field Hospital from use class B1/B2 to use class D1 Non-residential institution (field hospital & coronavirus testing/mass vaccination centre) for a period of three years with the use reverting to Class B1/B2 uses upon cessation of the proposed use or the expiry of three years- whichever is sooner. No external alterations to the property are proposed as part of this submission. The proposals include a car park to the south of the field hospital & coronavirus testing/mass vaccination centre which will accommodate approximately 560 spaces.

The Bay Field Hospital has provided coronavirus testing and mass vaccination facilities following the commencement of use in December 2020. Moving forward the Bay Field Hospital will be required to host additional healthcare related services including clinics and training facilities.

Planning Policy Context

Local Context

The statutory Development Plan is the adopted Neath Port Talbot CBC Local Development Plan 2011 – 2026 (adopted January 2016) in addition to the National Development Framework for Wales (Future Wales: The National Plan 2040). Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that planning applications and appeals be determined in accordance with the development plan “unless material considerations indicate otherwise”.

Section 38(4) of the PCPA 2004 (as amended) states that:

“For the purposes of any area in Wales the development plan is: (a) the National Development Framework for Wales, (b) the strategic development plan for any strategic planning area that includes all or part of that area, and (c) the local development plan for that area”.

Accordingly, the policies of relevance contained within the National Development Framework and the adopted JLDP are now discussed.

Future Wales: The National Plan 2040

Future Wales sets out a spatial strategy as a guiding framework for where large scale change and nationally important development will be focused over the next 20 years. The policies of the Spatial Strategy which are relevant to the scheme are now discussed.

Policy 1 – ‘Where Wales will grow’ indicates the Welsh Government supports sustainable growth in all parts of Wales. Three National Growth Areas are identified, where growth in employment and housing opportunities and investment in infrastructure. The application site is situated within the Swansea Bay & Llanelli NGA.

Policy 2 – ‘Shaping Urban Growth and Regeneration – Strategic Placemaking’ indicates 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. The policy sets out a number of placemaking principles which includes (inter alia): creating a mix of uses; provides a variety of housing types and tenures; building places at a walkable scale; increasing population density, building at urban densities; establishing a permeable network of streets; and integrating green infrastructure.

Policy 3 – ‘Supporting Urban Growth and Regeneration – Public Sector Leadership’ indicates the Welsh Government will play an active, enabling role to support the delivery of urban growth and regeneration. The Welsh Government will assemble land, invest in infrastructure and prepare sites for development, working with local authorities and other public sector bodies to unlock the potential of their land and support them to take an increased development role. Furthermore, the public sector’s use of land, developments, investments and actions must build sustainable places that improve health and well-being.

Policy 28 – ‘National Growth Area – Swansea Bay and Llanelli’ indicates the Welsh Government believes Swansea Bay and Llanelli to be the main focus for growth and investment in the South West region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

Neath Port Talbot Local Development Plan 2011 – 2026

Policy SC1 Settlement Limits indicates development within settlement limits that is proportionate in scale and form to the role and function of the settlement as defined by the Settlement Hierarchy will be acceptable in principle.

Policy SP4 Infrastructure indicates developments will be expected to make efficient use of existing infrastructure and where required make adequate provision for new infrastructure, ensuring that there are no detrimental effects on the area and community.

Policy SP5 Development in the Coastal Corridor Strategy Area indicates sustainable growth and development will be promoted within the Strategy Area to benefit the County Borough as a whole, while protecting and enhancing the area’s character and environment.

Policy EC2: Existing Employment Uses indicates the application site is situated within allocation EC2/1 (Fabian Way), where uses will be restricted in accordance with Policy EC3, to protect the employment function of the County Borough’s employment areas.

Policy EC3: Employment Area uses states that within allocated and existing employment areas, unless otherwise specified and where appropriate, uses will be restricted as follows:

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

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

Policy EC4: Protection of Existing Employment Uses indicates that proposals which would result in the loss of existing land or buildings in employment use as defined in Policy EC3 and/or within the existing employment areas identified in Policy EC2, will only be permitted where the following criteria are satisfied:

1. It is demonstrated that employment uses are no longer viable or appropriate in this location; or
2. Continued use for employment purposes would have unacceptable impacts on the environment, local amenity or adjacent uses; or

3. The existing space can be redeveloped for employment uses that achieve an increased level of employment combined with other appropriate uses.

Policy TR2: Design and Access of New Development indicates 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.

Strategic Policy SP1: Climate Change indicates that the causes and consequences of climate change will be addressed by reducing dependence on the private car and the need to travel in general through promoting alternative means of transport and more efficient use of existing facilities, co-location and joint use of facilities.

Supplementary Planning Guidance

Neath Port Talbot Parking Standards 2016

This Supplementary Planning Guidance (SPG) provides information about the standards that will need to be achieved in respect of parking provision across Neath Port Talbot. The Fabian Way Employment Area is categorised as Zone 4 (Suburban or near urban) within the SPG. Here it is stated that Health Centres & Surgeries should provide 1 space per operational practitioner, 1 space per 3 non-operational ancillary staff and 3 spaces per non-operational practitioner.

National Context

Planning Policy Wales Edition 11

Planning Policy Wales (PPW) Edition 11 (February 2021) sets out the land use planning policies of the Welsh Government. The primary objective of the latest version of PPW is to ensure that the planning system contributes to the delivery of sustainable development and improves the social, economic, environmental and cultural wellbeing of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

The Well-being of Future Generations (Wales) Act 2015 seeks to improve the social, economic, environmental and cultural well-being of Wales. It contains seven well-being goals which certain public bodies (including local health boards) must seek to achieve in order to improve well-being both now and in the future. Paragraph 2.12 relates to the interaction between the Well-being and Future Generations (Wales) Act 2015 and PPW, it states:

“The planning system is a very important policy, decision making and delivery mechanism. It should seek to maximise delivery of outcomes against all aspects of well-being/sustainable development, thus seeking to maximise contributions towards all of the goals of the Well-being of Future Generations Act. This can be achieved by adopting a placemaking approach”

Placemaking considers the context, function and relationships between a development site and its wider surroundings. The five-key sustainable placemaking outcomes are outlined at Figure 4 of PPW 11, which should be used to inform the assessment of development proposals. These are:

- Growing the economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Maximising environmental protection and limiting environmental impact.

PPW indicates the built and natural environment is a key determinant of health and well-being, where the planning system has an important role in shaping the social, economic, environmental and cultural factors which determine health.

Furthermore, the way places work and operate can have an impact on the choices people makes in their everyday lives. Additionally, PPW highlights how the planning system should identify proactive and preventative measures to reduce health inequalities, especially in those disadvantaged and deprived communities where people are disproportionately affected by health problems. Hence, the planning system should consider the provision of and access to health assets in order to ensure planning authorities fulfil their role in the prevention of physical and mental illness which may be exacerbated by the impacts of new development.

Key Planning Issues

Principle of Development

The proposed change of use of the Bay Field Hospital will see the re-use of an existing industrial unit within the Fabian Way Employment Area, prioritising the use of previously developed land (PDL) and existing buildings – in accordance with the Making Best Use of Resources tenet of the PPW11 National Sustainable Placemaking Outcomes. PPW11 indicates PDL “should, wherever possible, be used in preference to greenfield sites where it is suitable for development” (para 3.55) The re-use of PDL also accords with the requirements of Strategic Policy SP1 of the Neath Port Talbot Local Development Plan which aims to prioritise the effective use of land and reduce the effect on local resources.

The application site is situated within the settlement boundary, defined under Policy SC1 Settlement Limits which states *“development within settlement limits that is proportionate in scale and form to the role and function of the settlement as defined by the Settlement Hierarchy will be acceptable in principle”*. On this basis, the proposal’s location within the settlement boundary establishes a basis principle of development.

The application site occupies a highly sustainable location within the Fabian Way Employment Area, an established employment led mixed use area which benefits from excellent connections to the surrounding highway network. The site is conveniently situated approximately 400 metres north of the A483 which feeds directly into Swansea city centre 3.16 km to the west. Additionally, following the A483 east for 3.3 km leads to the M4 which links to port Talbot and later Cardiff.

In terms of access via sustainable modes of transport, the nearest bus stop is located approximately 450 metres southwest of the site at Elba Cres, providing access to the 84 and 84A buses which serve Port Talbot and Swansea. There is also a direct bus link, the 9A, which runs every 20 minutes from Swansea city bus station to Bayfield Hospital. The site is easily accessible on foot and is served by the existing network of pavements and pedestrian footpaths that are found across The Fabian Way Employment Area. In respect of cycle access the National Cycle Route 4 from Swansea runs directly across the sites access. In summary, the site is considered highly accessible via sustainable modes of transport in accordance with Strategic Policy SP1 of the Neath Port Talbot Local Development Plan - which encourages the use of active travel for local journeys and reducing the need to travel by private car.

In summary, it has been demonstrated how the proposed development is consistent with the principles of sustainable development through the re-use of previously developed land, in a highly sustainable and accessible location, which allows active travel as a viable alternative to private vehicle use. Importantly, the application site is situated within the settlement boundary – establishing a basic principle of development. On this basis, a principle of development for the proposed change of use has been established which considers the requirements of both Local and National planning policy.

Loss of Employment Land

As highlighted in the planning policy context section above, the application site is allocated for employment uses within the Neath Port Talbot Local Development Plan under Policy EC2, which seeks to safeguard land for employment uses. Policy EC3: Employment Area Uses states that within allocated and existing employment areas, unless otherwise specified and where appropriate, uses will be restricted as follows:

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

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

Furthermore, Policy EC4 indicates that proposals which would result in the loss of existing land or buildings in employment use and/or within the existing employment areas will only be permitted where the following criteria is satisfied:

1. It is demonstrated that employment uses are no longer viable or appropriate in this location; or
2. Continued use for employment purposes would have unacceptable impacts on the environment, local amenity or adjacent uses; or
3. The existing space can be redeveloped for employment uses that achieve an increased level of employment combined with other appropriate uses.

Whilst it is acknowledged that the proposed development does not fall under the uses set out under Policy EC3 and does not satisfy the criteria set out under Policy EC4, the proposed development makes the most efficient use of under-utilised employment floorspace and represents the re-use of previously developed land in accordance with PPW11.

Beyond the requirements of policy EC4 it is important to state that the proposed Class D1 Use (non-residential institution) will not detrimentally affect the use of the existing employment uses which adjoin the site and are found in the wider Fabian Way Employment Area. In terms of day-to-day use, the field hospital & testing/mass vaccination centre will not create any additional operational noise or impacts that would differ from typical Class B employment uses. Indeed, the proposals do not comprise any physical alterations to the application site or the adjoining car parking area. Given the temporary nature of the permission, it is anticipated the proposed use would not jeopardise the ability of any established businesses around Fabian Way to operate effectively.

Additionally, the applicant requires a site that benefits from a prominent location and high levels of accessibility via the existing highway network. As highlighted in preceding sections, the application site is located in close proximity to the A483 and represents an ideal location for members of the public who may be attending the unit from the surrounding region.

As highlighted in preceding sections, the proposed change of use is sought for a temporary period of three years. It is suggested a condition be attached to any future planning permission which requires the use to revert back to the existing Class B employment uses upon cessation of the proposed use or the expiry of three years from the date of the permission, whichever is sooner. The condition will therefore ensure the unit is restored to its original use following the cessation of the temporary permission. Therefore, by ensuring the unit returns to employment use after a three-year period, the LPA retains the ability to protect and preserve the area for employment uses in the long term, satisfying the over-arching planning policy objective of the LDP.

It should also be noted that an adjoining site was given permission for a change of use from Class B2 to Class D1 in July 2020. In this case the presiding officer concluded that, due to its linkages with industry and the nature of the development, it is not considered to be a major departure to the development plan policies in place. On this basis, the planning history has demonstrated how class D1 uses can be found acceptable at the subject site.

Parking

In accordance with the Neath Port Talbot Parking Standards 2016, the proposed development is capable of providing the necessary car parking provision. As highlighted above, the proposals include a new car park situated to the south of the field hospital & coronavirus testing/mass vaccination centre. There are anticipated to be approximately 120 members of staff, therefore 120 parking spaces are required for the operational staff. In respect of non-operational requirements, a maximum of 360 spaces will be required based on the calculation of 120 practitioners (3 spaces per practitioner). However, it appears unlikely all 120 members of staff will be classified as a 'practitioner' ie doctor, nurse, health visitor. This presents a maximum parking requirement of 480 spaces. The car park adjoining the site contains approximately 560 spaces. As such, the proposals are capable of accommodating the maximum parking requirements and satisfy the Neath Port Talbot Parking Standards 2016.

Conclusion

As set out above, the proposed development comprises the temporary change of the use of the Bay Field Hospital from use class B1 (business) / B2 (general industrial) to use class D1 Non-residential institution (field hospital & coronavirus

testing/mass vaccination centre) for a period of three years. To summarise, this covering letter has made the following pertinent points towards a positive determination:

- The application site is situated within the settlement boundary, defined under Policy SC1 Settlement Limits, establishing a basic principle of development at the subject site.
- The proposed development is consistent with the principles of sustainable development through the re-use of previously developed land, in a highly sustainable and accessible location, which allows active travel as a viable alternative to private vehicle use.
- Importantly, the proposed Class D1 Use will not detrimentally affect the use of the existing employment uses which adjoin the site and are found in the wider Fabian Way Employment Area.
- It is suggested a condition be attached to any future planning permission which requires the use to revert back to the existing Class B employment uses upon cessation of the proposed use or the expiry of three years from the date of the permission, whichever is sooner. By ensuring the unit returns to employment use after a three-year period, the LPA retains the ability to protect and preserve the area for employment uses in the long term, satisfying the over-arching planning policy objective of the LDP.
- It should also be noted that an adjoining site was given permission for a change of use from use class B2 to use class D1 in July 2020 – demonstrating the acceptability of D1 uses in the locality.
- In accordance with the Neath Port Talbot Parking Standards, the proposed development is capable of providing the necessary car parking provision.

Finally, notwithstanding the policy compliant position set out above, it should also be noted that provision of appropriate testing and vaccination facilities, including beyond the 18-month period provided for in recent permitted development changes, is a significant material consideration weighing in favour of the grant of this permission. Appropriate testing and vaccination facilities look likely to play an increasing significant role in re-opening society and the economy in a pandemic and post-pandemic world. Accordingly, while policies generally seek to maintain business floorspace in Class B uses in order to safeguard the jobs and economic activity, it can certainly be stated that allowing the economy to re-open will make the most significant positive contribution to prosperity and job creation. Having appropriate testing facilities and vaccination centres are a crucial part of achieving that.

We trust the above and enclosed provides you with sufficient information at this stage. A payment of £xxxx has been made in respect of the requisite application fee.

In the meantime, please contact us if you require any additional information regarding the proposal.

Yours sincerely,



Oliver Hanney
Senior Town Planner
Tetra Tech Planning