

## **SECTION A – MATTERS FOR DECISION**

### **Planning Applications Recommended For Refusal**

<b><u>APPLICATION NO:</u> P2016/0254</b>	<b><u>DATE:</u> 22/03/2016</b>
<b>PROPOSAL:</b>	Proposed pub/restaurant, access, car parking, layout and associated works (Outline permission with means of access and layout to be agreed).
<b>LOCATION:</b>	Land at Glynneath Business Park , Adjacent To A465, Glynneath , Neath
<b>APPLICANT:</b>	Waterstone Estates Ltd
<b>TYPE:</b>	Outline
<b>WARD:</b>	Blaengwrach

### **Background**

Prior to his recent passing, the late Cllr Alf Siddley called the application into Planning Committee on socio economic grounds.

### **Planning History:**

The site has a detailed planning history, of which the following is of relevance to this application : -

**93/444** – Business park: B1 (business), B2 (general industry), B8 (storage & distribution), A3 (food & drink) – Approved with conditions 17/11/94

**95/497** – Provision of basic roads and drainage, and changing of levels to allow future development – Approved with conditions 07/03/96

**96/1807** – Earthworks and drainage, re-profiling site to new levels to suit future development (commercial) – Approved with conditions 10/03/97

**97/1278** – Marketing board – Approved with conditions 09/02/98

**97/1408** – Outline permission for use classes B1, B2, B8, A3, C1 and petrol service station. A/C 5/3/98

**99/445** – McDonald's restaurant: little chef restaurant: Esso petrol service station and associated roadworks (adjacent land for future development) – Approved with conditions 12/10/99

**99/1141** – Pole mounted sign – Refused 23/11/99

**99/1243** – Proposed little chef, Glynneath (part of approval no 99/445) submission of details under condition 3-materials-of planning permission no: P/99/0445 – Approved 06/01/00

**99/1244** – Proposed little chef, Glynneath (part of approval No 99/445) submission of details under condition 7(d)-parking- of planning permission No 99/445 – Approved 06/01/00

**99/1247** – Proposed little chef, Glynneath (part of approval No 99445) submission of details under condition 11-parking and surface materials under planning permission No 99/445 – Approved 16/12/99

**00/119** – Submission of details under condition 7 (parking facilities) of previous planning consent 99/445 – Approved 10/03/00

**00/127** – McDonald's logo and estate sign structure – Approved with conditions 10/03/00

**00/252** – Embedded electricity generation plant – Approved with conditions 08/08/00

**00/879** – Approval of details required under Condition 3 of Previous Planning Consent 99/445 – Approved 03/08/00

**00/1018** – Approval of details under condition 2 (landscaping) of previous planning consent 99/445 – Approved 06/11/00

**00/1243** – Infrastructure works to enable future development (including vehicle and pedestrian access, drainage, ground improvement and landscaping) – Approved with conditions 13/03/01

**02/742** – 20,000 sq. ft and 15,000 sq. ft. industrial units at Glynneath Business Park – Approved with conditions 10/09/02

**02/1422** – New factory with linked administration (office) block – Approved with conditions 11/02/03

**03/947** – Outline application - Erection of secure training centre involving the construction of new administration, accommodation, educational and sports facilities, provision of car parking, service yard, erection of perimeter and security fencing, lighting and landscaping to site and relocation of pumping station – Approved with conditions 2/12/03

**10/174** – Replacement signage at roof level on front and both side elevations, five no. free standing internally illuminated signs, one no. banner sign, one no. customer order display, replacement totem sign and signs to be placed on replacement height restrictor – Approved with conditions 6/4/10

**10/180** – External alterations including re-cladding and blocking up of an existing booth window, alterations to entrance door, height restrictor, customer order display and replacement external seating area – Approved with conditions 6/4/10

**10/780** – Discharge of condition 2 (car park drainage) of planning permission 10/180 – Approved 19/8/10

**10/1128** – Creation of temporary car park, un-controlled pedestrian crossing over B4242, temporary footpath and footbridge over the Neath Canal for a period of 24 months – Not Determined

**Publicity and Responses if applicable:**

Blaengwrach Ward: No objections

Blaengwrach Community Council: It is felt that it is a much needed facility for this area, as well as bringing a much needed resource to Blaengwrach it would enhance the development as a tourist area within the Brecon Beacons, Lakes, Pontneddfechan Falls and much more in this area which sadly lacks this kind of amenity.

It would also bring to the area employment which has been diminishing over the last years with the loss of colliery's and industry which has devastated the jobs in the vicinity, with many young people with vision of employment left sadly with very little prospects.

The project is looking to bring up to 60 jobs to the area and an opportunity for apprenticeships in hospitality etc. This is not an

opportunity we can afford to miss, so we are asking you to look at this application favourably and bring this facility to our Community.

National Resources Wales: No objection

Environmental Health and Trading Standards (Contaminated Land): No objection

Head of Engineering and Transport (Highways): No objection

Head of Engineering and Transport (Drainage): No objection

The Glynneath Regeneration Group: The Regeneration Group recognise the benefit of the proposed facilities particularly to users of the A465 and also the potential local job creation benefits. However, concerns were also expressed at the impact of the development on the existing town centre. Their view was that the greatest regenerative benefit would be realised if the land was developed with uses that are complementary to the services and facilities in the town centre rather than a duplication

A Site Notice was displayed and the application was advertised in the local press.

One letter of objection has been received which objects on the grounds that this has potential to have negative effects on his business and others in the surrounding Glynneath area.

Two letters of support have been received from Bethan Jenkins AM and Jeremy Miles AM which are summarised as follows:

**Bethan Jenkins AM** pledges her support to the planning application.

*She believes that these developments will create many opportunities for the villages of Glynneath, Cwmgrach and Resolven. Such opportunities include employment which is needed in the area, it will enhance the area and make it more than a place people pass when travelling on the A465.*

**Jeremy Miles AM** advises that he has been contacted by the residents and community representatives from Blaengwrach who are in support of the planning application and the potential employment opportunities that the proposal would bring. While acknowledging that the application site

is positioned outside the settlement limits and within the mineral safeguarding area, states: -

*“However, due to existing facilities alongside the proposed development and the cessation of mineral extraction activity in recent years, many residents believe that to recommend refusal at this junction would not reflect the potential benefits to the local community, particularly for the younger generation with the huge potential for the development of apprenticeships in the catering and service industry within such an environment.”*

*“With regards to a threat to existing businesses within Glynneath town centre, it is also believed that the majority of business generated would be associated with passing trade on the A465, primarily motorists which would not divert through the town to access services.”*

### **Description of Site and its Surroundings:**

The site measures approximately 0.95 hectares in area and is situated adjacent to the existing McDonalds restaurant on the A465 Heads of the Valleys Road. To the north and beyond the river is an area of vacant land which received planning permission in 2015 for a primary healthcare centre and pharmacy.

The site is situated approximately 1.5km to the south west of Glynneath district centre and beyond the established settlement limits for the purposes of the adopted Neath Port Talbot Local Development Plan.

### **Brief description of proposal:**

Members should note that this proposal comprises the second of two proposed ‘phases’ for a roadside service area, with the first phase (P2016/0117) appearing elsewhere on this agenda.

This application seeks outline planning permission with all matters reserved for a pub/restaurant, access, car parking, layout and associated works.

The parameters submitted indicate the pub/restaurant will have the following dimensions:

Width 30m (minimum) 35m (maximum)  
Depth 18m (minimum) 23m (maximum)

Eaves height

Single-storey 2.4m (minimum) 3m (maximum)

Two-storey 4.8m (minimum) 5.5m (maximum)

Ridge height

Single-storey 5.4m (minimum) 7.5m (maximum)

Two-storey 8m (minimum) 10m (maximum)

The illustrative plan shows parking for up to 85 spaces.

### **Main issues:**

The issues to be considered in the determination of this application relate to the principle of the development at this location having regard to the prevailing planning policies, the relevance of the planning history of the site together with any impact on visual and residential amenity, highway and pedestrian safety, and an assessment of relevant material considerations

### **Policy Context:**

Planning Policy Wales (Edition 8) 2016

Paragraph 7.6.1 advises:

*“Local planning authorities should adopt a positive and constructive approach to applications for economic development. In determining applications for economic land uses authorities should take account of the likely economic benefits of the development based on robust evidence. In assessing these benefits, key factors include:*

- the numbers and types of jobs expected to be created or retained on the site;*
- whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment;*
- a consideration of the contribution to wider spatial strategies, for example for the growth or regeneration of certain areas.”*

Whilst it is acknowledged that the development will result in the creation of employment opportunities, this is only one of the above factors which must be considered. The other key factors identified above confirm the need to ensure that a development supports the Council's regeneration priorities and wider spatial strategies. In this regard the Council has identified a regeneration priority within the Glynneath area centred around the Park Avenue site. This site was chosen due to its size, ability to accommodate a mixture of commercial and residential uses, and its sustainable and accessible location within the heart of the community, close to the district centre but also close to the A465. This regeneration priority has been further highlighted following the designation of the Park Avenue site as a mixed use Valleys Regeneration Scheme under Policy VRS1 within the adopted LDP. The supporting text associated with this policy goes on to state:

*Within the Upper Neath Valley Strategic Growth Area, the Park Avenue Mixed Use Regeneration Scheme at Glynneath is key to delivering the growth strategy to the area and is considered to present the best opportunity for the growth of the town. A mix of residential and retail uses is envisaged.*

As stated above Policy VRS1 designates a sustainably located site which has been assessed as part of the LDP Examination process to be most suitable to accommodate a range of mixed uses including the use proposed under this application. In contrast the application site is detached from the district centre of Glynneath and is located outside settlement limits where there is a presumption against such development. While it is acknowledged that the application site is prominently located adjacent to the A465 and there is potential to secure trade from vehicles on the A465, the location of the allocated regeneration site which is also close to the A465 would also secure this aim in addition to supporting the vitality and viability of the district centre of Glynneath. Furthermore the approval of this development may have a negative impact upon existing services within Glynneath as it would capture passing trade from the A465 who might otherwise be encouraged into Glynneath itself. As a result whilst it is acknowledged that the development would lead to job creation opportunities, these could also be realised should the allocated site be developed, which for the reasons specified above is considered to be a more sustainably and appropriately located site and as such does not comply with the objectives of PPW relating to economic development.

Technical Advice Note 12: Design (2016)

Technical Advice Note 18: Transport (2007)

Technical Advice Note 23: Economic Development.

This primarily deals with business uses contained within Classes B of the Use Classes order however the principles can be extended to job creation and economic development opportunities more generally. It amplifies the objectives of PPW as specified above by including a number of considerations which should be assessed for developments which are not in accordance with the sequential test. These tests are assessed in detail within the appraisal to this report.

### **Neath Port Talbot Local Development Plan**

In accordance with the Planning and Compulsory Purchase Act 2004, the Council prepared the Local Development Plan (2011-2026). The LDP was submitted for independent Examination to the Planning Inspectorate on 30<sup>th</sup> September 2014 and the Ministers of the Welsh Government appointed independent Inspectors to conduct the Examination to assess the soundness of the Plan. The LDP Examination officially ended on the 2<sup>nd</sup> December 2015 when the Council received the Inspectors' Report from the Planning Inspectorate. The Report was published and the recommendations contained within were 'binding', meaning that the Council had to accept the changes recommended by the Inspectors.

The Council formally adopted the LDP on 27<sup>th</sup> January 2016, and therefore the proposal must be assessed against the following relevant Policies within the LDP: -

#### **Strategic Policies**

- Policy SP1            Climate Change
- Policy SP2            Health
- Policy SP3            Sustainable Communities
- Policy SP4            Infrastructure
- Policy SP6            Development in the Valleys Strategy Area
- Policy SP12           Retail
- Policy SP14           The Countryside and Undeveloped Coast
- Policy SP15           Biodiversity and Geodiversity
- Policy SP16           Environmental Protection
- Policy SP17           Minerals



- Policy SP19 Waste Management
- Policy SP20 Transport Network
- Policy SP21 Built Environment and Historic Heritage

## Detailed Policies

- Policy SC1 Settlement Limits
- Policy I1 Infrastructure Requirements
- Policy R3 Out of Centre Retail Proposals
- Policy EN6 Important Biodiversity and Geodiversity sites
- Policy EN7 Important Natural Features
- Policy EN8 Pollution and land stability
- Policy M1 Development in Mineral Safeguarding areas
- Policy M2 Surface Coal Operations
- Policy M3 Development in Mineral Buffer Zones
- Policy W3 Waste Management in New Development
- Policy TR2 Design and Access of New Development
- Policy BE1 Design

## Principle of Development

The application site lies outside of the settlement limit of Glynneath as defined by Policy SC1 of the adopted LDP, and is therefore defined as being within the ‘countryside’.

Policy SC1 lists 12 circumstances under which development would be permitted outside settlement limits, with only criterion (1) being of relevance to this proposals insofar as it allows a proposal which “constitutes a sustainable small scale employment use adjacent to a settlement limit”.

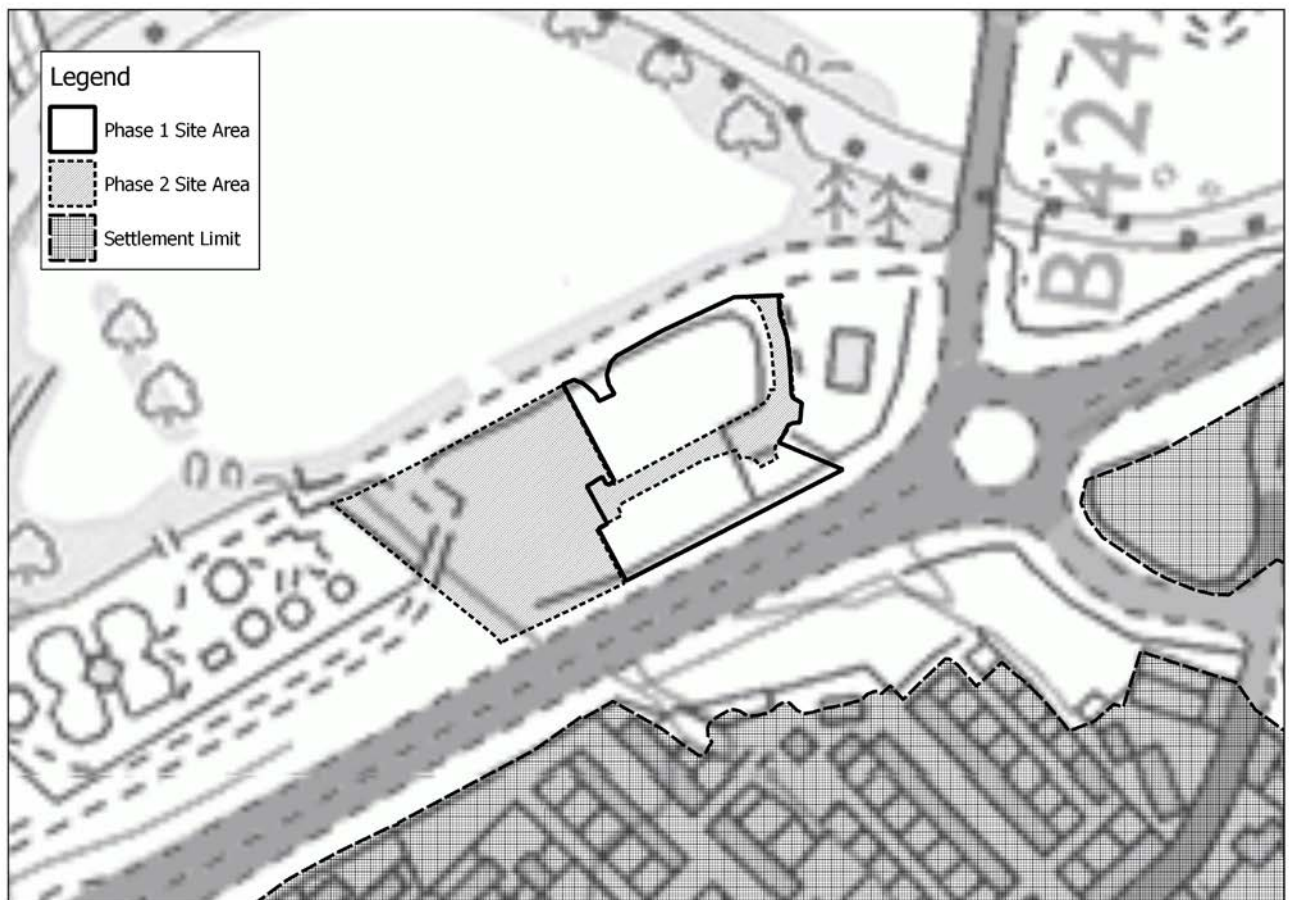
Considering the proposal against this criterion, it is considered that: -

- The proposal is not considered to amount to a *small-scale* development. This is because the applicant has confirmed that this is phase two of a larger scheme. The cumulative effect of the existing McDonalds restaurant, together with the petrol filling station and drive-thru coffee shop which are proposed within phase one and the pub/restaurant proposed under this application would be more than small in scale and would not occupy a sustainable location.

- In terms of the location of the site, (discounted the access which runs through phase one of the larger scheme) the application site will be located a minimum distance of 400m from the edge of the settlement associated with Glynneath, 205m from Blaengwrach and 45m from Cwmgwrach. Furthermore the site is separated from the settlement of Glynneath by extensive highway infrastructure, a river and open areas of land, while the A465 which is a dual carriageway separates the site from both Blaegwrach and Cwmgwrach. For these reasons the site cannot be considered as being adjacent to the settlement.

In respect of the second point, the applicant has stated that they consider the site to be 'adjacent' to the settlement limit, and argue that their interpretation of the dictionary definition and its synonyms "close to", "proximate to", "nearby" etc. offer credence to their interpretation.

Nevertheless, the dictionary definition of the word 'adjacent' is: "*next to or adjoining something else*", and applying this definition the application site is clearly not adjacent to the settlement limit.



Having regard also to the purpose of the planning policy which seeks to restrict development outside of settlement boundaries, it is considered that such terminology can only reasonably be given its common sense meaning. It is therefore concluded that as a matter of fact the application site is not adjacent to the settlement limit.

Accordingly, it is considered that the proposal does not fall within any of the exceptions allowed under Policy SC1, and therefore the principle of development is contrary to the Local Development Plan.

The proposed development would therefore represent a departure to the Development Plan, and it is therefore pertinent that Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that “where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”. Such material considerations are addressed below.

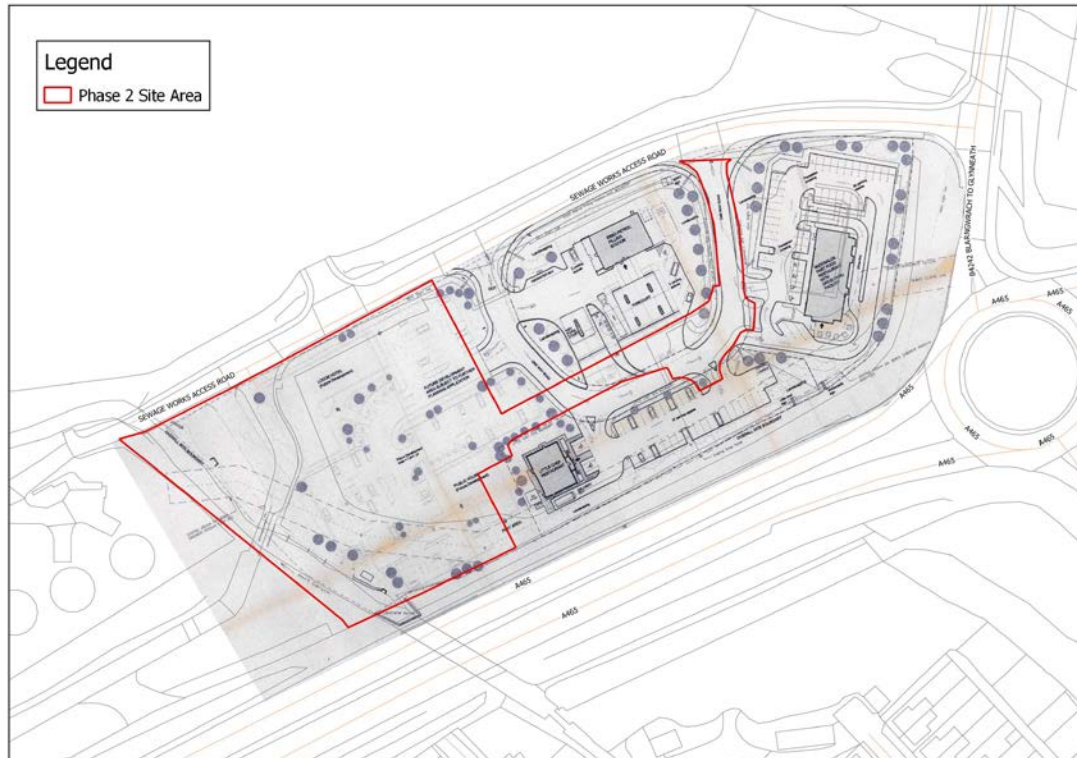
## **Material Considerations**

### Site History / Fallback

The applicants have submitted a planning statement on the associated phase 1 application which seeks to rely on the potential to complete the development permitted by P1999/0445 as a fall back option. As noted in the planning history above, that approved “McDonald's restaurant: little chef restaurant: Esso petrol service station and associated roadworks (adjacent land for future development)” in October 1999.

Whilst the issue of an extant permission being in place was integral to the applicant's justification for the first phase of the development (P2016/0117), it is not an issue with regard to this second phase as the parcel of land subject to this planning application has not received planning permission historically for the uses proposed under this submission.

The plan below shows the extent of the historic planning permission and that of this proposal.



## Economic Benefits

The applicants state that the proposal will create employment opportunities which are likely to be recruited locally, and that local contractors will be used during the construction phase, thus further supporting the local economy. They thus argue that the economic benefits outweigh any Policy concerns.

In considering such matters, it is also noted that National guidance in respect of economic development is contained in TAN23, and in this regard paragraph 1.2.7 outlines that a sequential test should be used when ... determining planning applications. Judgement should be applied to the economic use and its applicability to the particular location. First preferences should be given to sites within settlement limits, second preference to edge of settlement sites, and third preference should consider land in the open countryside. It also notes that if land supply within settlements is already sufficient to meet demand, then generally it will be wrong to identify sites in the countryside.

TAN 23 further advises that where a planning authority is considering a planning application ... it should ask three questions in order to help

clarify and balance the economic, social and environmental issues. These are considered in turn below:

**Alternatives:** if the land is not made available (the site is not allocated, or the application is refused), is it likely that the demand could be met on a site where development would cause less harm, and if so where? This test follows from the principle in PPW, that the planning system should steer development to the most sustainable locations.

As mentioned earlier in the report, the LDP has allocated a mixed use regeneration site at Park Avenue, Glynneath (VRS 1 - Valleys Regeneration Scheme), which the LDP considers is “key to delivering the growth strategy to the area and is considered to present the best opportunity for the growth of the town. It is a site of significant scale close to the town centre and is therefore key for the future growth and change of the town”

It is not considered that the development amounts to a ‘roadside service’ area given that it proposes a pub/restaurant. The potential harm caused by this development in discouraging growth from within the village boundaries as people use this development as an alternative is considered unacceptable. Furthermore the development could undermine the delivery of the council’s designated regeneration site to the detriment of the sustainable development of Glynneath.

**Jobs accommodated:** how many direct jobs will be based at the site?

The accompanying evidence suggests the proposal will create up to potentially 37 full/part time new jobs. This figure was given by the applicant in relation to the restaurant use. That being considered, the very nature of the restaurant use and the scale parameters given, it is extremely unlikely that this will equate to 37 full time jobs. The creation of 37 jobs however, will not offset the harm to the potential town centre growth initiatives proposed through the valleys regeneration scheme that have been adopted by the local authority which could themselves generate similar if not more jobs within the heart of the community. As a consequence there are serious concerns that the development will adversely affect the delivery of the wider regeneration aspirations for Glynneath.

**Special merit:** would the development make any special contribution to policy objectives? For example, a major employment site may be a key

element of a wider spatial strategy which aligns jobs, development and infrastructure.

The only factor of relevance relates to the 37 jobs created by this development. Whilst each and every job created is valued, this development will undermine the delivery of a scheme on the allocated regeneration site at Park Avenue and as such it would be contrary to the policies which seek to promote economic development within this area.

Accordingly, while acknowledging that the proposed use would 'create employment', this is not considered to be of such significant weight that it would justify the development outside of settlement limits to the detriment of the Councils wider regeneration aspirations for this area and it is therefore contrary to Policy SC1 and to the principles contained within TAN23.

#### *Principle of Development Conclusion*

For the reasons given above, it is therefore concluded that the development of this site would amount to unjustified new development in the countryside, which fails to accord with Policy SC1 of the Local Development Plan. In addition, notwithstanding the potential economic benefits identified above, it has been concluded that there are no material considerations of sufficient weight to override the harm caused by reason of its failure to meet adopted LDP Policy.

Following the above assessment of the 'principle' of development, other matters are considered in turn below

#### **Retail Impact**

LDP Policy R3 concerns itself with retail proposals outside defined retail centres but within settlement limits. The policy states that out of centre retail proposals will only be permitted where they satisfy the following criteria:

1. It is demonstrated that there is a need for the development; and
2. The development cannot be accommodated within a defined retail centre and is located in line with the sequential approach; and

3. The vitality and viability of existing retail centres will not be undermined taking into account the cumulative effects of other approved retail developments, recently completed developments and plan commitments; and

4. The proposal would not undermine the Council's retail hierarchy or any regeneration schemes that the Council has formally approved;  
Or:

5. The proposal is within the Coastal Corridor Strategy Area and is for a new retail unit, change of use or extension resulting in a premises of 100m<sup>2</sup> gross floorspace or less and is demonstrated to serve local neighbourhood needs; or

6. The proposal is within the Valleys Strategy Area and is a new retail unit, change of use or extension resulting in a premises of 200m<sup>2</sup> gross floorspace or less.

It has been argued earlier in this report that there is no justified need for this proposal at this location, moreover it is considered that its location outside both the defined settlement limits and the allocated regeneration site for Glynneath will undermine the delivery of a more sustainable development on the allocated site together with existing services within Glynneath itself. As a result the development would be contrary to criterion 1 and 4 of Policy R3.

In terms of the second criterion, the allocated regeneration scheme site is considered to be more appropriately located and the uses proposed within this application could be accommodated on that site. Turning to the third criterion, as indicated earlier in this report the proposed use is remotely located from the district shopping centre and whilst it is acknowledged that they are aiming to secure passing trade from the A465, they will also capture the trade which could have been directed into Glynneath itself. This will therefore have a negative impact upon the vitality and viability of the district shopping centre.

The fifth criterion is not relevant to this application. The sixth and final criterion specifies a threshold of 200m<sup>2</sup> of gross floorspace outside of the district shopping centre. Whilst this application is in outline only, the submitted parameters indicate that the pub/restaurant will incorporate a gross floorarea of between 540m<sup>2</sup> and 805m<sup>2</sup> which exceeds the threshold specified in Policy R3.

Furthermore there are very serious concerns that the development will reduce or even remove trade which is currently being diverted into Glynneath, to the detriment of its vitality and viability. The development may also affect the ability to attract additional new retail investment to the town, notably at the mixed use regeneration site at Park Avenue Glynneath. This site is considered to be the most appropriate and sustainable location for such new development in the Glynneath area.

The above position is supported by the Glynneath Regeneration group who recognise the benefit of the proposed facilities particularly to users of the A465 and also the potential local job creation benefits. However they raise concerns with regard to the impact of the development on the existing town centre.

Accordingly it is considered that the proposal will result in the creation of an out of town development contrary to Policy R3 of the LDP.

### **Visual Amenity:**

The application is made in Outline with all matters reserved. The parameters of development proposed would enable a restaurant to be constructed within the area without impacting upon the character and appearance of the area as a whole when viewed with the detailed plans submitted as part of "Phase 1".

As was the case with Phase 1, the flat site incorporates the existing bund as a shielding mechanism against the A465.

Therefore in terms of visual amenity, it is considered that the proposed development could, through the use of a quality design and use of finishes safeguard the overall character and appearance of the surrounding area.

### **Residential Amenity:**

The proposed development by virtue of its location away from nearby properties (the nearest residential property being located at 46 Cefn Gelli) and across significant highway infrastructure, would have no unacceptable impacts upon nearby residential properties.



## **Highway Safety (e.g. Parking and Access):**

The Head of Engineering and Transport (Highways) has assessed the proposal and is satisfied that the development will not have a negative impact on highway and pedestrian safety. As a result there is no objection to this development on highway and pedestrian safety grounds subject to the imposition of a number of conditions.

## **Flooding**

The application was accompanied by a Flood Consequences Assessment and substantial hydraulic modelling where it was concluded that the site is compliant with the requirements of Technical Advice Note 15 (TAN15). This document was scrutinised by Natural Resources Wales who in turn shared the conclusion that the site is compliant with TAN15. Therefore the application is considered to be acceptable in terms of any flooding impacts / issues.

## **Mineral Safeguarding**

It is also noted that the site is located within a Mineral safeguarding area under Policy M1 of the adopted LDP (coal safeguarding).

Policy M1 looks to safeguard mineral resources as they are finite and any development will need to meet criteria which ensure they are not sterilised or their extraction hindered.

Notwithstanding the above it is considered that the development due to its scale and location will not have a significant impact on the working of the mineral. Moreover, given the sites relationship to existing and future already approved development including McDonalds and the recently approved health care centre to the south, and given the site's close proximity to the settlement limits and visual prominence, it is very unlikely that any mineral extraction would be acceptable in this location. Accordingly, there is no objection to the principle of development on mineral safeguarding / Policy M1 grounds.

## **Conclusion:**

The site is located outside of the defined settlement limit, and outside of land allocated or safeguarded for employment or retail use by the LDP, where such uses should be located in order to steer economic development to the most appropriate and sustainable locations. Policy

SC1 only allows exceptions for small scale employment uses, and it is considered that by reason of its scale and location away from the settlement boundary, the proposed development does not amount to an exception for proposals outside settlement limits detailed in Policy SC1. Furthermore the development will undermine the regeneration aspirations of the Council within the Glynneath area as defined under Policy VRS1. Accordingly the proposal would amount to unjustified new development in the countryside, contrary to Policies SC1 and R3 of the Neath Port Talbot Local Development Plan and contrary to the objectives of Planning Policy Wales and the national guidance contained in Technical Advice Note 23 (Economic Development), and that there are no material considerations of sufficient weight which outweigh the harm caused by reason of its failure to comply with the above Policies.

**RECOMMENDATION:            Refusal**

(1) The proposed development represents an unjustified form of development outside the defined settlement limits, the development of which would also undermine the sustainable growth of Glynneath contrary to Policy SC1 of the Neath Port Talbot Local Development Plan.

(2) The proposed development by virtue of the use proposed and its location outside the defined district shopping centre and outside the allocated Valleys Regeneration Scheme Site, will adversely affect the function together with the vitality and viability of the district shopping centre and will also undermine the Council's aspirations to deliver a comprehensive regeneration scheme on an allocated and more sustainably located site within Glynneath and as such is contrary to the objectives of Planning Policy Wales, TAN 23 and Policies VRS1 and R3 of the Neath Port Talbot Local Plan.