

Planning Statement

Heol Tabor

Cwmavan

September 2026

amity

planning consultants



Overview	
Client	This statement is submitted on behalf of Bluefield Land Ltd.
Context	The statement relates to a proposed full planning application for residential development engineering, access, drainage, landscaping and associated works at Heol Tabor, Cwmavan.
Preface	This application follows the withdrawal of planning application ref. P2024/0623, which sought full planning permission for the <i>“Construction of 5 No. two-bedroom bungalows with on-site parking, landscaping scheme and associated engineering works.”</i> The application was validated on 24 October 2024 and subsequently withdrawn in April 2026. During the determination of application P2024/0623, the Applicant secured the involvement of a Registered Social Landlord (RSL) partner, providing an opportunity to deliver affordable housing. This resulted in an evolution of the development proposals from five two-bedroom bungalows to 10 affordable units comprising eight apartments and two bungalows. Given the increase in the number of dwellings and associated changes to the form, layout and technical parameters of the development, the Local Planning Authority advised that it would not be appropriate to accommodate the revised scheme through the substitution of plans within the withdrawn application. It was therefore agreed between the Applicant and Neath Port Talbot Council that the most appropriate procedural course was to withdraw application P2024/0623, undertake a further period of pre-application engagement and subsequently submit a new application encompassing the revised development proposals in their entirety. The evolved scheme was subsequently considered through formal pre-application enquiry Q2026/0177, with the Council's written response issued on 28 July 2026. The pre-application response was broadly supportive of the development and confirmed the acceptability of the principle of residential development, subject to the satisfactory resolution of the detailed planning and technical matters identified. The scheme has subsequently been reviewed and amended, where necessary, to respond to the matters raised through that process. Accordingly, this application presents the evolved development proposals in full and should be considered in the context of the substantial technical and consultation work already undertaken in respect of the site. This Planning Statement therefore provides, where relevant, an overview of the consultation responses received during the determination of application P2024/0623, the subsequent pre-application advice provided under Q2026/0177, and the manner in which the current proposals have responded to the matters previously identified. A comprehensive suite of technical information accompanies the application at submission. Certain further ground-related investigations and associated technical reporting are also being progressed and will be submitted during the determination period. This approach enables the application programme to progress in parallel with the completion of those investigations, whilst ensuring that the LPA and relevant consultees are provided with the necessary technical evidence, and afforded an appropriate opportunity to consider that evidence, prior to the determination of the application.

Supporting Documents

Architecture

- 2851-00(03)100 Location Plan
- 2851-00(03)100F Site Layout
- 2851-00(03)102B Parking Provision Plan
- 2851-211(03)200B - HT 211 Floor Plans
- 2851-211(03)300A - HT 211 Elevations
- 2851-212(03)200A - HT 212 Floor Plans
- 2851-212(03)300 - HT 212 Elevations
- 2851-BS(02)300 - Bin & Bike Store Plans and Elevations
- 2851-Visuals & Key Plan
- Cwmavan Design Statement

Ecology

- Cwmavan Biodiversity Enhancement Strategy WWE26067
- Cwmavan ECIA WWE26067
- Cwmavan WWE26067 PEA 2026

Engineering

- Cwmavan 2851-505a - Engineering Appraisal
- Cwmavan 2851-500a - Drainage Strategy Plan

Landscape

- Cwmavan - Detailed Soft Landscape Proposals (Rev B)
- Cwmavan - Green Infrastructure Statement
- Cwmavan -Landscape Specification & Management Plan (Rev A)

Transport

- Cwmavan Transport Statement 2026

Ground

- Cwmavan Phase 1 SI October 2020
- Cwmavan Phase 2 SI Report Feb 2024
- Cwmavan R2 GIR Interperative Report Rev 2 Novemeber 2025
- Cwmavan SI Remediation Strategy July 2025

Arboriculture

- Cwmavan Tree Protection Plan

Topographic

- Cwmavan Topographic Survey 1 of 2
- Cwmavan Topographic Survey 2 of 2

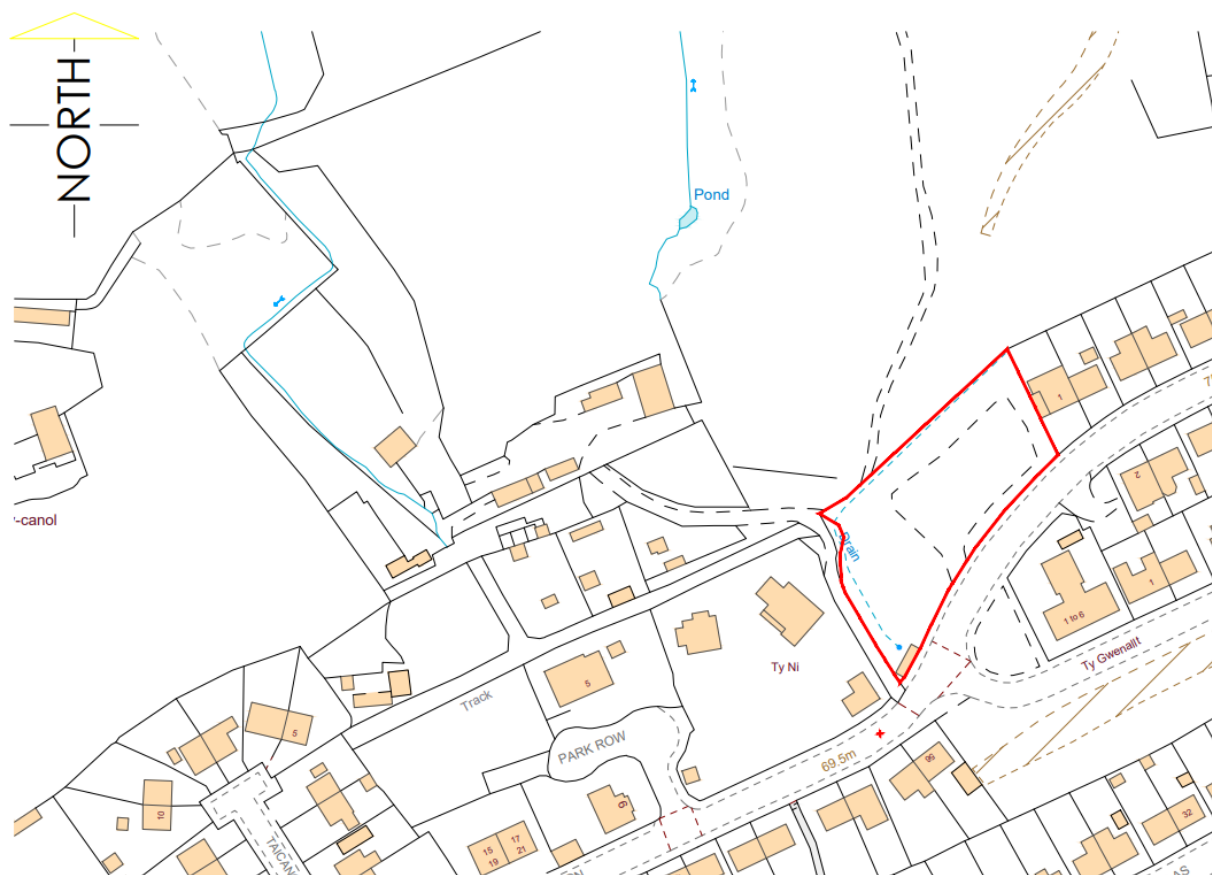
Other

- Affordable Housing Letter RSL Cwmavan
- Domestic Air Source Heat Pumps Professional Advice Note (2026)

Site Details

Site Location

Figure 1: Red line plan (Spring Design)



Site Description

The application site comprises a vacant parcel of land located on the northern side of Heol Tabor, Cwmavan in Neath Port Talbot. The site occupies a plot adjacent to the junction of Heol Tabor and Heol Tewgoed within an established residential area characterised by a mix of detached, semi-detached and terraced dwellings. Residential properties lie to the east, south and west of the site.

The site is currently empty and comprises predominantly scrub vegetation and previously disturbed land. Ground levels rise from the southern frontage with Heol Tabor towards the northern boundary, creating a noticeable change in levels across the site.

The site fronts directly onto Heol Tabor, an adopted residential highway subject to a 20mph speed limit. Existing pedestrian infrastructure is available along Heol Tabor, providing connections to the wider settlement and local services.

The site also benefits from an existing vehicular access from Heol Tabor.

Development Proposals

The Scheme

The proposed development comprises the construction of 10 affordable residential units together with associated access, parking, landscaping, drainage infrastructure and public realm enhancements. The scheme has been carefully designed to respond positively to the site's physical characteristics, surrounding residential context and the wider placemaking objectives of Planning Policy Wales and the LDP. The proposal seeks to transform a long-vacant and underutilised parcel of land into a high-quality residential development that integrates naturally with the existing settlement pattern along Heol Tabor. The proposal will provide 100% affordable housing provision.

Figure 2: Proposed Layout Rev F (Spring Design)



The development adopts a linear layout arrangement that follows the established building line and highway alignment of Heol Tabor. The proposed dwellings are positioned along the eastern side of the site fronting the highway, ensuring active frontage. The arrangement of built form has been carefully considered in order to create a coherent and legible form of development. The proposal also represents a logical infilling of the settlement.

The scheme comprises a mix of residential accommodation including 8no. one-bedroom walk-up flats and 2no. one-bedroom bungalows, providing a range of housing options suited to local affordable housing needs, including accommodation suitable for smaller households and older persons. The proposed units have been arranged in a manner that maximises efficient use of the site whilst maintaining an appropriate standard of residential amenity for future occupiers and avoiding site specific constraints, including that of ground conditions.

A strong emphasis has been placed on achieving a high-quality and attractive layout through the integration of landscaping and green infrastructure. Private rear gardens are provided for residents together with soft landscaped frontage areas and strategically positioned tree planting throughout the site. The landscape strategy assists in softening the visual appearance of the development, integrating the scheme into its surroundings and enhancing biodiversity value. Areas of public-facing landscaping are also proposed and will contribute positively to the streetscene and overall sense of place.

Figure 3: 3D Visuals (Spring Design)



Vehicular access to the development will be taken directly from Heol Tabor via driveway arrangements. Parking provision has been incorporated sensitively within the layout to ensure convenient access for residents whilst avoiding parking-dominated streetscenes. The parking areas are located directly adjacent to the dwellings they serve and have been integrated within the overall landscape framework of the site. Pedestrian access routes and private footpaths have also been incorporated to ensure safe movement throughout the development.

The proposed layout has also been informed by the site's existing topography and boundary conditions. Existing embankments and vegetation along the western edge of the site have been retained helping to provide a natural visual buffer and reinforce the edge of the development. The siting and orientation of the dwellings have been carefully considered to minimise overlooking, maintain privacy, avoid grounds constraints and create an attractive residential environment with appropriate levels of outlook and natural light.

The apartment building presents a simple and well-proportioned form. The front elevation provides active surveillance over the site frontage and parking areas, whilst the side and rear elevations maintain a consistent architectural approach through the use of appropriately scaled openings and simple detailing. The building has been designed to avoid excessive bulk or massing and is comparable in scale to surrounding residential development.

The proposed bungalows adopt a similarly simple architectural form with pitched roofs and a symmetrical arrangement of fenestration. Their single-storey scale ensures that they sit comfortably within the streetscape and provide an appropriate transition between the proposed apartment building and surrounding residential properties.

The overall appearance of the development is intentionally modest and functional, reflecting its affordable housing purpose whilst delivering a high-quality residential environment. The proposed dwellings incorporate a coherent palette of materials and architectural detailing that will create a unified development and contribute positively to the visual character of the area.

The proposed materials comprise of the following:

- Brickwork façade
- Red facing brick Timber cladding to front elevations - Black
- Plain smooth slate effect tiles - slate grey
- Grey PVCu rainwater goods
- Soffits and fascias – PVCu Grey

The design has also incorporated low-carbon technologies, including air source heat pumps.

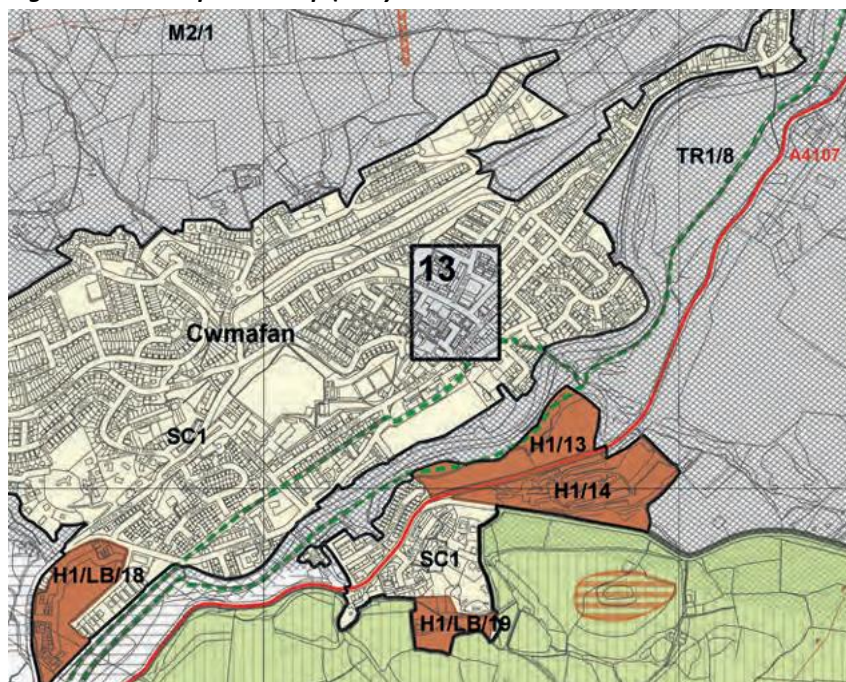
It is therefore concluded that the design and layout of the scheme is of a high quality, meeting all relevant criteria within Policies SP3, SP4, AH1, TR2, BE1 amongst others.

Relevant Planning Policy

Local Development Plan

The Neath Port Talbot Local Development Plan (2011-2026) is the adopted development plan for the proposed site location.

Figure 4: LDP Proposals Map (NPT)



Legend

- Neath Port Talbot County Borough Boundary
- Overarching Policies
- Settlement Limit (SC1)
- Safeguarded Coal Resource (M1)

For the purposes of the Local Development Plan, the site lies just outside the defined settlement boundary of Cwmafan and is designated as a coal resource. However, through the progression of the now withdrawn application (P2024/0623), the Local Authority have welcomed residential development at this location in principle, recognising its sustainable position and the logical rounding off of the existing settlement.

The following LDP Policies are of most relevance to the proposals:

SC1: Settlement Limits

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. Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form.

SP6: Development in the Valleys Strategy Area

In the Valleys Strategy Area, the local economy and communities will be enhanced and reinvigorated, and the distinctive environment will be protected through the following area-specific measures:

- i. Identifying Pontardawe and the Upper Neath Valley as Strategic Growth Areas (SGAs);
- ii. Making provision for the majority of new valleys residential development within the identified SGAs;
- iii. Safeguarding employment sites and uses;
- iv. Promoting a mixed-use regeneration scheme at Glynneath;
- v. Undertaking public realm improvements in Glynneath and Pontardawe Town Centres;
- vi. Identifying Rheola as a tourism site and safeguarding key tourism amenities;
- vii. Taking a flexible approach to encourage employment uses, including live-work units (11);
- viii. Taking a flexible approach to encourage small scale retail proposals;
- ix. Protecting cultural identity including areas of importance for the Welsh language.

SP7: Housing Requirement

In order to deliver the 7,800 new dwellings required to meet the economic-led growth strategy, provision will be made for the development of 8,760 additional dwellings between 2011-2026 including a 12.31% flexibility allowance.

SP8: Affordable Housing

Provision will be made to deliver 1,200 affordable housing units within Neath Port Talbot over the Plan period (2011-2026) through the following measures:

- i. Setting thresholds and targets requiring housing developments to contribute to affordable housing provision; and
- ii. Providing a framework for determining affordable housing exception sites.

AH1: Affordable Housing

All new housing developments, including conversions, on sites accommodating 3 or more units will be required to contribute to affordable housing provision.

The exact affordable housing contribution to be provided will depend on the circumstances of each proposal and the viability of the scheme. The provision of affordable housing will be implemented through the use of planning conditions, obligations and/or legal agreements between the Council, Developers and Registered Social Landlords.

SP10: Open Space

Provision will be made to ensure that all residents have access to adequate open space through the following measures:

- i. Ensuring that new development addresses local needs;
- ii. Retaining and protecting existing open space.

OS1: Open Space Provision

Where there is a quantitative deficiency in outdoor sport, children's play, informal space or allotments, provision will be sought, including the requirement for maintenance, in conjunction with all new residential developments of 3 or more dwellings, based on the following standards:

Open Space	Standard
Outdoor Sport	1.6 hectares per 1,000 population
Children's Play	0.25 hectares per 1,000 population
Informal Space	0.55 hectares per 1,000 population
Allotments	0.19 hectares per 1,000 population

In the case of employment or commercial development proposals of over 1,000 sqm, provision will be sought for associated amenity space.

Policy TR2: Design and Access of New Development

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 TR3: Safeguarding of Disused Railway Infrastructure

Disused or redundant railway infrastructure will be safeguarded and development which would inhibit the re-opening or the re-use for transport purposes will be resisted, unless it can be demonstrated that such re-opening or re-use is not realistic or necessary.

Policy BE1: Design

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-off and flood 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.

	Policy EN7: Important Natural Features 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 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 pollution Policy EN 8: Pollution and Land Stability 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: 1. Air pollution; 2. Noise pollution; 3. Light pollution; 4. Contamination; 5. Land instability; 6. 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.
Supplementary Planning Guidance	The Neath Port Talbot Council Local Development Plan (2011 – 2026) is complemented by a series of Supplementary Planning Guidance documents that provide further advice and guidelines on specific policies. Although Supplementary Planning Guidance does not have the same status or weight as the adopted local development plan, it can be considered as a material consideration in determining planning applications. The following SPGs are of relevance: • Planning Obligations (October 2016) • Affordable Housing (October 2016) • Open Space and Green Space (July 2017) • Parking Standards (October 2016) • Design (July 2017)

Planning History	The following planning history is of relevance to the development proposals: App ref: P2024/0623 - Construction of 5 No. 2-bedroomed bungalows with on-site parking, landscaping scheme and associated engineering works – Withdrawn 2026. App ref: P2020/1071 - Construction of 4 x detached bungalows and 2 x semi-detached dwellings (Outline application with all matters reserved) – Approved 2021.
Request to LPA	
Principle of Development	The proposed development seeks to bring a long-vacant and underutilised site back into beneficial use through the delivery of a high-quality residential scheme comprising 10 affordable dwellings. The proposal represents a logical and sustainable extension to the existing built form of the settlement and will provide a meaningful contribution towards addressing the significant identified need for affordable housing within Neath Port Talbot County Borough. Whilst the site lies marginally outside the defined settlement boundary, the principle of residential development at this location has previously been established as being acceptable by the Local Planning Authority throughout the sites planning history, where the site was considered to constitute an appropriate rounding off of the settlement. In physical and visual terms, the site is closely related to the existing pattern of development along Heol Tabor and is contained by established residential development to the east and north. The proposed scheme would therefore integrate naturally with the existing settlement form and would not result in isolated or sporadic encroachment into the countryside. The submitted site layout demonstrates a coherent and well-related form of development that responds positively to the surrounding urban grain and existing highway alignment. Notwithstanding this established baseline, the proposal is further supported in principle through Policy AH2 of the Neath Port Talbot Local Development Plan, which supports small affordable housing exception sites adjoining settlement limits where specific criteria are satisfied. Firstly, there is a clear and demonstrable need for affordable housing within Neath Port Talbot County Borough. The Neath Port Talbot Local Housing Market Assessment (2019) identified a requirement for an additional 978 affordable homes between 2018 and 2033. Whilst this assessment has not been updated in recent years, affordable housing need remains a significant and well-established issue across the County Borough. In this regard, the Registered Social Landlord have confirmed that a continued need exists for affordable housing within the area. The proposal would therefore make a meaningful contribution towards addressing an identified and ongoing housing need through the provision of 10 affordable dwellings in a sustainable location. The delivery of affordable housing remains one of the Council’s most pressing strategic objectives and substantial weight should therefore be attributed to schemes capable of increasing the affordable housing stock in sustainable locations.

The proposal would deliver 100% affordable housing, comprising 10 units specifically designed to meet local housing needs. The submitted layout includes a mix of one-bedroom apartments and bungalows, providing accommodation suitable for smaller households and older residents, thereby contributing towards a more balanced housing stock within the area. The development therefore directly responds to identified local housing requirements and would provide social and economic benefits through the provision of secure and accessible homes for local people.

The proposal occupies a highly sustainable location adjacent to the existing settlement, with future occupiers benefiting from convenient access to existing services, facilities and public transport connections within the wider settlement area. The development would therefore reduce reliance on private vehicle use and aligns with the overarching sustainability objectives of the LDP and Planning Policy Wales.

Beyond Policy AH2, the redevelopment of the site would regenerate a vacant and visually neglected parcel of land, enhance the character and appearance of the locality through a comprehensive landscaping strategy, and create an attractive and cohesive form of development that respects the surrounding residential context. The layout has been carefully designed to provide appropriate private amenity areas, landscaping, parking provision and pedestrian connectivity, ensuring the scheme delivers a high standard of placemaking.

In context of this, the principle of the proposed development has also been subject to detailed consideration by Neath Port Talbot County Borough Council through the formal pre-application process. A pre-application enquiry was submitted for the development of 10 affordable dwellings with associated engineering, drainage and landscaping works, with the Council issuing its formal response on 28 July 2026 under reference Q2026/0177.

Importantly, the Local Planning Authority concluded that the proposed development is acceptable in principle. Whilst acknowledging that the site lies immediately outside the currently defined settlement limit and therefore gives rise to a degree of conflict with Policy SC1, the Council considered that this conflict is limited. In particular, the site directly adjoins the established settlement, is contained by existing development and would represent a logical rounding-off of the settlement rather than an intrusive or isolated encroachment into the open countryside.

The Council also considered the proposal in the context of Policy AH2 relating to Affordable Housing Exception Sites. Although the proposed 10 dwellings exceed the nine-unit threshold within Policy AH2 by a single dwelling, the pre-application response recognised that the underlying purpose of the policy is to facilitate affordable housing to meet identified local need. Significant weight was therefore afforded to the fact that the scheme would provide 100% affordable housing, is directly adjacent to the established settlement, would contribute towards identified housing need, supports the strategic housing objectives of Policies SP7, SP8 and AH1, and would not result in an isolated form of development. The Council consequently considered that the underlying objectives of Policy AH2 could be substantially met notwithstanding the marginal exceedance of its numerical threshold.

This conclusion was further reinforced through consideration of national planning policy. The LPA recognised the priority afforded by Planning Policy Wales to increasing the supply of

	affordable housing within sustainable locations and noted that the site is physically connected to the existing settlement, benefits from access to the established highway network and enables future residents to access the services and facilities available within Cwmavan. The development was therefore considered to align with the wider placemaking principles of PPW. The Council's overall planning balance at pre-application stage was unequivocal, concluding that: <i>“On balance, the broader strategic and social benefits associated with the provision of much-needed affordable housing, together with the site's sustainable relationship to the existing settlement and the limited extent of harm arising from the modest extension beyond the current settlement boundary, are considered to outweigh the identified policy conflicts. Accordingly, the proposal can be considered acceptable in principle.”</i> The Policy Team also specifically identified a need for 55 one-bedroom social rented units in the Port Talbot Housing Market Area, with 92% of county-wide net annual social housing need relating to one-bedroom properties. More importantly for AH2, they considered the four Cwmavan allocations - two have been developed and Western Logs/Hawthorn Close are no longer considered deliverable, while the remaining windfall permissions are open-market. The LPA therefore says it can reasonably be concluded that there are no available opportunities within the settlement limits Overall, the principle of development is considered to be in accordance with the LDP. The proposal represents an appropriate and sustainable form of residential development, delivers a significant affordable housing benefit in an area of identified need, and accords with the objectives of Policy AH2 and the wider strategic aims of the Neath Port Talbot Local Development Plan and Planning Policy Wales.
Amenity	The proposed development has been carefully designed to provide a high standard of residential amenity for future occupiers whilst ensuring that the living conditions of existing neighbouring residents are appropriately safeguarded. The layout has been informed by the established residential character of Heol Tabor, the position and orientation of surrounding properties, the site's topography and the need to provide appropriate levels of privacy, outlook and natural light. The application site is surrounded by existing residential development, principally along Heol Tabor and Ty Gwenallt, with the proposed development forming a continuation of the established residential frontage. The siting and orientation of the proposed dwellings have been carefully considered in relation to neighbouring properties to ensure that the development would not result in unacceptable overlooking, loss of privacy, overbearing impacts or material loss of daylight or sunlight. The proposed buildings are predominantly positioned towards the eastern side of the site and address Heol Tabor, reflecting the established orientation and pattern of development within the surrounding area. Existing properties on the opposite side of Heol Tabor are separated from the development by the intervening public highway and associated frontage areas. This physical separation, together with the orientation and scale of the proposed buildings, ensures an

appropriate relationship with existing dwellings and avoids an unacceptably enclosed or overbearing form of development.

To the north and west, the site's existing embankment, retained vegetation and proposed landscape buffer provide further physical and visual separation between the development and surrounding land uses. The submitted Site Layout also demonstrates that the proposed built development is concentrated away from the western site boundary, with the intervening landscaped and undeveloped areas assisting in maintaining an appropriate relationship with the existing property known as Ty Ni.

The scale of the proposed development is also appropriate to its residential context. The two proposed bungalows are single-storey in form, thereby inherently limiting their potential effect upon neighbouring properties, whilst the proposed walk-up apartment accommodation has been designed at a scale and massing that remains compatible with the surrounding built environment. The Local Planning Authority's formal pre-application response under Ref. Q2026/0177 recognised that the proposed layout successfully follows the established building line, reinforces the existing street pattern and provides an outward-facing and coherent form of development rather than introducing isolated or fragmented development.

With regard to the amenity of future occupiers, the development has been designed to create a pleasant, functional and attractive residential environment. The proposed accommodation provides appropriately proportioned internal living spaces, whilst the arrangement of windows provides suitable levels of outlook and natural surveillance. The Local Planning Authority specifically acknowledged at pre-application stage that the proposed accommodation is well considered and generally exceeds minimum expectations for affordable one-bedroom accommodation, with efficient internal layouts, adequate circulation space and functional living environments. The accessible design of the proposed bungalows was also afforded positive weight.

Private outdoor amenity areas are incorporated within the development, supplemented by substantial areas of soft landscaping and green infrastructure. The Site Layout distinguishes between private rear gardens, resident-managed frontage areas and wider public-facing landscaping, creating a clear hierarchy between public and private space and providing an attractive setting for future residents. The landscape framework, including new tree and shrub planting and the retained undeveloped buffer, will further contribute towards privacy, visual amenity and the overall quality of the residential environment.

Overall, the proposal provides an appropriate relationship between new and existing development and would secure a high standard of accommodation for future occupiers. The scale, siting, orientation, landscaping and boundary treatments incorporated within the scheme ensure that the development would not result in unacceptable impacts upon neighbouring residential amenity through overlooking, loss of privacy, loss of light or overbearing effects. The proposal is therefore considered to accord with Policy BE1 of the Neath Port Talbot Local Development Plan.

Open Space	The proposed development has been considered against Policies SP10 and OS1 of the Neath Port Talbot Local Development Plan and the Council's adopted Planning Obligations Supplementary Planning Guidance. The scheme comprises 10 one-bedroom affordable dwellings and has been designed to incorporate a strong landscape and green infrastructure framework within the site. The development retains a substantial landscaped buffer along the northern boundary adjacent to the existing woodland and incorporates areas of soft landscaping, native tree and shrub planting, species-rich grassland and vegetated sustainable drainage features. These areas will contribute positively to the amenity and environmental quality of the development and provide an attractive setting for future residents. Given the modest scale of the site and the nature of the proposed development, formal areas of outdoor sport or children's play are not proposed on-site. Importantly, the Council's formal pre-application response recognised that the Planning Obligations SPG provides an exception in respect of children's play contributions for developments consisting solely of studio or one-bedroom accommodation. As all 10 proposed dwellings comprise one-bedroom units, a contribution towards children's play provision is therefore not anticipated to be applicable. The Local Planning Authority has nevertheless advised that contributions towards the remaining categories of open space identified by Policy OS1, including outdoor sport, informal open space and allotment provision, are likely to remain applicable. The precise level of any contribution will be determined in accordance with the Council's adopted methodology and, where necessary, secured through an appropriately worded Section 106 Agreement.
Community Engagement	Although the proposed development does not meet the statutory threshold requiring formal Pre-Application Consultation under the relevant Welsh planning legislation, the importance of ensuring that the local community was appropriately informed of the proposals was nevertheless recognised. In this regard, the partner Registered Social Landlord (RSL) has undertaken its own non-statutory notification exercise with local residents and neighbouring occupiers. This provided information regarding the proposed affordable housing development and afforded interested parties an opportunity to become aware of the proposals and liaise with stakeholders if necessary. Whilst this exercise did not constitute a formal statutory Pre-Application Consultation process, it represents a proportionate and proactive approach to community engagement having regard to the scale and nature of the proposed development.
Highways and Transport	A detailed Transport Statement has been prepared by Apex Transport Planning to assess the transport and highway implications of the proposed development, including the accessibility of the site by sustainable modes, highway safety, access arrangements, parking provision, servicing and forecast vehicle trip generation. The TS builds upon the earlier Access Statement submitted at pre-application stage and responds directly to the detailed comments subsequently provided by the Highway Authority. Importantly, the Council's formal pre-application advice did not identify any overriding highway

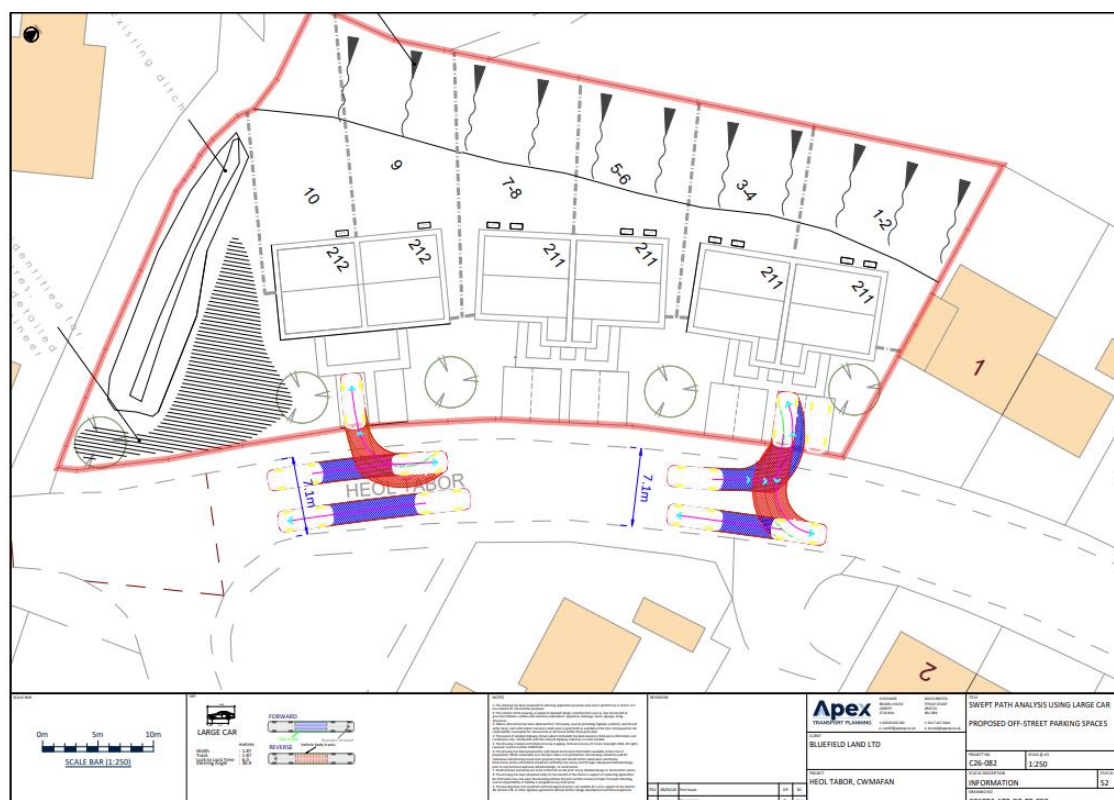
objection to the principle of development, subject to the detailed matters raised being satisfactorily addressed.

Heol Tabor is a lightly trafficked residential road operating within a 20mph speed limit. The carriageway measures approximately 6.5–7.0 metres in the vicinity of the site and accommodates some informal on-street parking. Its residential character, frontage development, direct property accesses and existing parking activity contribute to a naturally low-speed environment. Similar frontage parking and vehicle crossover arrangements are already established throughout the surrounding highway network.

The proposed development would be served by direct vehicular access from Heol Tabor through frontage vehicle crossovers. The arrangement reflects the established character of the surrounding residential area and has been developed further following the Highway Authority's pre-application comments concerning parking, crossovers, pedestrian and vehicular visibility, landscaping, pedestrian provision, cycle parking, gradients, surfacing and drainage.

The final access arrangement demonstrates 2.0m × 25m vehicular visibility splays, appropriate to the 20mph speed environment, together with 2.4m × 2.4m pedestrian visibility splays in accordance with the Highway Authority's pre-application requirements. These areas would be maintained free of landscaping or other obstruction. Swept-path analysis using a large car also demonstrates that vehicles can appropriately manoeuvre into and out of the frontage parking spaces within the available carriageway.

Fig. 5 – Swept Path Analysis (Apex Transport)



The development provides 12 off-street parking spaces, comprising one dedicated resident space for each of the 10 affordable dwellings together with two dedicated visitor spaces. The latter accords with the NPTCBC Parking Standards SPG requirement for one visitor space per five dwellings. This represents an improvement upon the earlier arrangement by providing visitor demand within the site rather than relying upon surrounding on-street capacity.

The frontage parking has also been reconsidered in response to the Highway Authority's pre-application comments. Apex notes that the Council's Highway Technical Design Guide differentiates between conventional private driveways and grouped parking alongside an adoptable highway. The proposed arrangement more closely reflects the latter, comprising adjoining frontage spaces serving separate residential units. At 3.2 metres wide, the proposed spaces exceed the 2.6 metre width identified for grouped parking, while separate pedestrian approach paths are provided to the dwellings.

The level of parking provision is also supported by local car ownership characteristics. The 2021 Census data for the Output Area containing the site demonstrates that 68% of households have one car or less. Apex notes that this data encompasses all dwelling and tenure types and that car ownership associated with the proposed development, comprising exclusively one-bedroom affordable homes, could reasonably be expected to be lower. The provision of one resident space per dwelling, supplemented by dedicated visitor parking, is therefore considered appropriate.

Secure cycle parking is incorporated into the development. A secure and covered cycle store providing four spaces would serve the walk-up units, exceeding the minimum requirement of two spaces under the Council's Parking Standards SPG, while cycle storage for the two bungalows can be accommodated within their respective private curtilages.

The existing frontage footway would be retained, with separate private pedestrian paths providing access between Heol Tabor and the proposed dwellings. The site connects directly to the established pedestrian network, including a footway approximately 1.8–2.0 metres wide along the northern side of Heol Tabor, with onward connections through the surrounding residential area.

The site is well positioned to enable everyday journeys to be undertaken by sustainable modes. Local shops, schools, healthcare, community and leisure facilities are available within suitable walking and cycling distances, with a range of facilities accessible within a 20-minute walk. The surrounding 20mph residential streets also provide a low-speed environment conducive to cycling, with connections available to the wider National Cycle Network and Active Travel Network. This accords with the Council's own pre-application assessment, which described the site as occupying a "sustainable location within the existing settlement of Cwmafan".

Public transport accessibility is particularly good. The nearest bus stop is situated on Heol Tewgoed approximately 40 metres south of the site and is served by Service 81, which provides approximately hourly connections between Cwmclais Road and Port Talbot Parkway Railway Station between approximately 07:00 and 19:00 Monday to Saturday. Further bus services are accessible from stops along the B4286 approximately 800 metres to the south. Port Talbot Parkway provides onward regional and national rail connections.

	Refuse collection would take place from the kerbside on Heol Tabor, with dedicated bin storage provided to the rear of the walk-up units and within the individual curtilages of the bungalows. Routine deliveries and servicing can similarly take place directly from Heol Tabor. Emergency vehicles, including fire appliances, can serve the development directly from the highway, with all dwellings located within 45 metres of Heol Tabor. A quantitative assessment of vehicle trip generation has now also been undertaken using TRICS data for affordable/local authority flats, reflecting the affordable tenure, predominantly flatted form and one-bedroom nature of the proposed accommodation. The development is forecast to generate only approximately two two-way vehicle movements during each of the AM and PM peak hours and approximately 27 two-way movements across the 12-hour period. Apex concludes that this level of traffic would not materially affect the operation of the local highway network and that no formal capacity assessment or highway mitigation is required. The TS also undertakes a comprehensive review of Personal Injury Accident data. No incidents were recorded within the vicinity of the site during the most recent seven-year assessment period. Across the full 26 years of available data, only one incident was recorded in the vicinity, in 2011, which was classified as a slight injury accident. Apex therefore identifies no evidence of an existing highway safety issue which would be exacerbated by the development. The site frontage has also historically accommodated limited vehicular access movements without evidence of an associated road safety concern. Accordingly, the proposed access arrangements provide safe and suitable access to the development; the parking and cycle provision appropriately respond to the nature and tenure of the proposed homes; and the modest forecast trip generation would have no material effect upon the operation of the surrounding highway network. The site also provides realistic opportunities for future residents to travel by walking, cycling and public transport, reducing reliance upon the private car. The proposals are therefore considered to accord with the sustainable transport objectives of Planning Policy Wales, TAN 18, the Active Travel (Wales) Act 2013 and the relevant transport policies of the Neath Port Talbot Local Development Plan.
Trees	There are no trees located within the developable area of the site. However, a single tree is positioned outside of the application boundary along the adjacent embankment. This tree has been categorised as a Category C specimen following arboricultural assessment and, whilst of lower value, remains a material landscape feature that will be appropriately protected and retained as part of the proposed development. A Tree Protection Plan has been prepared by ArbTS accompanies the proposals and confirms that appropriate protection measures can be successfully implemented throughout the construction phase. The report identifies a suitable construction exclusion zone around the retained tree in accordance with the requirements of BS 5837. Importantly, the existing boundary fence line will be retained, ensuring that no construction activity, excavation works, storage of materials, vehicle movements or dumping of waste will occur within the protected

root protection area of the tree. The proposed development has therefore been carefully designed to avoid any direct or indirect impacts upon the retained tree.

Fig.6 Tree Protection Plan (ARBts)



In addition to the protection of existing vegetation, the scheme incorporates new tree planting as part of the wider Green Infrastructure Framework for the site, which will enhance the visual appearance, biodiversity value and landscape quality of the development.

The proposed planting strategy reflects the placemaking and green infrastructure objectives set out within Planning Policy Wales Edition 12 and will contribute positively towards the creation of an attractive and sustainable residential environment. It is therefore concluded that the proposal adopts a robust arboricultural approach, ensuring the protection of existing trees whilst delivering meaningful landscape enhancements in accordance with national policy and best practice guidance.

Ecology

An ECIA, and biodiversity enhancement scheme prepared by Wildwood Ecology are submitted with this application.

The application is supported by a comprehensive suite of ecological information prepared by Wildwood Ecology, including a Preliminary Ecological Appraisal, subsequent species surveys, an Ecological Impact Assessment and Biodiversity Enhancement Strategy. The assessment has therefore been informed by detailed survey work undertaken during 2026, including habitat surveys, a badger walkover, bat activity monitoring, great crested newt habitat assessment and reptile surveys.

The site itself comprises a mixture of bramble scrub, neutral grassland and sparsely vegetated land, together with an existing ditch. The development will result in the loss of approximately 423sqm of neutral grassland and 820sqm of sparsely vegetated land, however, the scheme has been designed to retain and strengthen the more ecologically valuable features of the site. In particular, the existing ditch will be retained and incorporated alongside the proposed sustainable drainage feature, while the northern bank and adjoining scrub will be retained and enhanced through native understorey planting. Existing grassland will also be supplemented by wildflower planting.

The landscape proposals have been developed alongside the ecological recommendations and provide a substantial area of habitat creation and enhancement. This includes a 5m wide native understorey buffer along the northern boundary, incorporating native whips and feathered trees, together with wildflower meadow, wetland and flowering lawn habitats. This creates an appropriate transition between the development and adjoining woodland and provides stronger ecological connectivity with the wider green infrastructure network.

The EclA identifies that the adjoining woodland may qualify as priority habitat, although it is located outside the application site and will not be directly affected by the development. The proposed northern landscape buffer, retention of the existing bank and boundary treatment will provide an appropriate separation between the residential development and this habitat. A close-boarded fence will also demarcate the enhanced buffer, helping to prevent residential encroachment while providing an additional barrier to light spill.

Importantly, detailed bat activity surveys have been undertaken. These recorded a range of species using the site and surrounding habitats, including common and soprano pipistrelle, Myotis species and noctule, together with more light-sensitive species including brown long-eared and lesser horseshoe bat. The overall assemblage was assessed as being of moderate ecological significance.

The proposals have therefore been specifically designed to ensure that lighting does not adversely affect the adjoining woodland edge or established bat commuting and foraging routes. No additional street lighting is proposed, with external lighting at the rear of the properties limited to motion-sensor lighting. A sensitive lighting plan will also be provided to demonstrate the retention of dark flight lines and control light spill towards the northern woodland boundary.

Given the confirmed presence of lesser horseshoe and brown long-eared bats, the lighting strategy will be required to achieve a maximum of 0.2 lux on the horizontal plane and 0.4 lux on the vertical plane at the retained woodland edge, taking account of both internal and external sources of lighting. The strategy will follow Bat Conservation Trust and Institution of Lighting Professionals Guidance Note 08/23 and incorporate appropriate measures including warm-white lighting of 2700 Kelvin or lower, controlled LED luminaires, negligible or zero upward light output and motion sensors with short activation periods where external security lighting is required. Construction works will also be undertaken during daylight hours to minimise disturbance. This strategy will be submitted during the determination period.

Reptile surveys identified slow worm and low populations of grass snake and common lizard. Reptiles were recorded on the south-facing northern bank, which is being retained and enhanced as part of the development. The ecological strategy therefore seeks to maintain this habitat while ensuring that construction works do not result in harm to reptiles.

Vegetation clearance will be undertaken in accordance with a precautionary working methodology and under ecological supervision. This includes directional and phased clearance towards retained habitat, ecological searches prior to further clearance and ground works, reptile fencing around development areas and the creation of brash piles adjacent to the retained ditch to provide additional refuge habitat. The ditch and retained habitat will also be protected from construction activity.

Great crested newt are not anticipated to be present on the site. The surveyed waterbodies were found to have water levels too low to support aquatic GCN and the onsite ditch is not connected to suitable offsite aquatic habitat. Nevertheless, a precautionary approach will be adopted during construction given the potential for occasional movement through terrestrial habitat, with works stopping and NRW consulted should GCN unexpectedly be encountered.

The EclA also considers other protected and notable species. No badger setts or evidence of badger activity were recorded within the adjoining woodland, although a precautionary pre-commencement check will be undertaken. Appropriate measures are also proposed for nesting birds and hedgehogs, including ecological supervision of vegetation clearance where necessary, protection of active nests, safe treatment of excavations and provision of gaps within new fencing to maintain movement through the site.

The scheme also incorporates a range of specific biodiversity enhancements, including integrated bat boxes, swift bricks, additional bird nesting provision, reptile/amphibian hibernacula and a hedgehog house. These measures sit alongside the wider habitat creation and enhancement proposed through the landscaping scheme and will provide permanent opportunities for biodiversity within the completed development.

The EclA also identifies Himalayan balsam and rockspray cotoneaster within the site, which will be appropriately managed, including treatment of Himalayan balsam. Japanese knotweed was identified within the adjoining off-site woodland but no works are proposed within this area.

Overall, the proposal has been developed in accordance with the stepwise approach to biodiversity. Existing ecological features have been retained wherever practicable, including the ditch and northern bank; potential construction impacts will be appropriately controlled; the relationship with the adjoining woodland is strengthened through new habitat and a sensitive lighting strategy and a range of new habitats and species-specific enhancements are incorporated into the development.

Accordingly, the ecological evidence demonstrates that the development can be delivered without significant adverse effects upon important ecological features. Indeed, Wildwood concludes that, with the identified mitigation and precautionary measures in place, no significant ecological impacts are anticipated. The proposals therefore provide an appropriate

	ecological response to the site while delivering habitat enhancement and opportunities for biodiversity as an integral part of the development, complying with PPW12 Chapter 6.
Flood Risk	Both the current Flood Risk Map for Planning and the Development Advice Map show that the site is at no risk of flooding from rivers and sea, nor surface water/small watercourses. Therefore, it is concluded that there is no risk of exacerbated flooding through the delivery of the proposed development. Furthermore, the scheme seeks to include appropriate drainage methods.
Drainage	A Drainage Strategy Plan has been prepared by Spring Design. The strategy demonstrates how foul and surface water drainage can be appropriately accommodated as part of the proposed development, with the surface water strategy incorporating Sustainable Drainage Systems in accordance with the statutory SAB requirements applicable in Wales. The surface water strategy adopts a treatment-train approach, incorporating a combination of porous surfacing, below-ground attenuation, rain gardens and controlled discharge. Parking areas will comprise a porous surface finish with an open-graded sub-base beneath, allowing surface water to be temporarily stored and attenuated before discharge. Flows from these areas will be restricted through orifice control chambers, thereby managing the rate at which runoff leaves the development. Fig.7 Drainage Proposal (Spring Design)

	Rain gardens are also proposed at rainwater pipe locations where feasible, providing source-control treatment close to where rainfall occurs and integrating the drainage strategy with the wider landscaping and biodiversity proposals. The strategy also incorporates cellular attenuation storage to provide additional surface water storage within the site. Surface water will ultimately discharge at a controlled rate to the existing ditch, which forms part of the existing drainage characteristics of the site. This approach responds directly to the existing site conditions, which include a ditch along the northern embankment and a further ditch running north to south along the western part of the site, receiving flows from the northern ditch and an existing drain entering the site from the west. The drainage proposals have also been considered alongside the ecological and landscape strategy. The existing onsite ditch is to be retained, with the Ecological Impact Assessment confirming that a sustainable drainage feature will be created within/around this habitat. This provides an opportunity for the drainage infrastructure to perform a multifunctional role, managing surface water whilst contributing to habitat retention and enhancement within the development. Foul drainage is proposed to connect to the existing Dŵr Cymru Welsh Water combined sewer network, with the Drainage Strategy identifying the potential foul outfall and proposed 100mm foul sewer infrastructure. The precise connection arrangement remains subject to the necessary drainage investigations and consultation with Dŵr Cymru Welsh Water. Overall, the drainage strategy demonstrates that the development can incorporate an appropriate SuDS solution through source control, attenuation and controlled discharge to the existing ditch, while foul flows can be directed towards the existing public sewer network. The proposals appropriately respond to the existing drainage characteristics and topography of the site and integrate drainage with the wider landscape and ecological strategy. The detailed arrangements will be subject to the separate statutory SAB approval process and agreement with the relevant drainage bodies.
Noise	Air source heat pumps are proposed as part of the low-carbon energy strategy for the development. The principle of incorporating ASHPs was welcomed by the Council at pre-application stage, recognising their contribution towards the decarbonisation of new development, reduction in greenhouse gas emissions and improved long-term sustainability of the proposed affordable homes. The Council's pre-application response identified the need to consider noise associated with the proposed ASHPs. Presetly, the Institute of Acoustics and Chartered Institute of Environmental Health have published the Domestic Air Source Heat Pumps Professional Advice Note (2026) which is submitted with this application. This provides current professional guidance specifically addressing the assessment of noise from domestic ASHP installations and establishes a proportionate, risk-based approach to considering potential effects. For typical domestic installations, the guidance provides a straightforward assessment route based upon the established MCS 020a methodology. There is therefore a clear and established technical route through which the final ASHP installations can be demonstrated to achieve an

	appropriate acoustic environment. Once the final units and detailed installation arrangements are confirmed, compliance can be demonstrated through the proportionate methodology set out within the 2026 IOA/CIEH route where required and a planning condition be imposed to ensure compliance of the specification to the standards. On this basis, a standalone Noise Impact Assessment involving noise monitoring is not considered necessary or proportionate at planning application stage. This position is supported by the latest professional guidance, which provides a more proportionate means of assessing domestic ASHP installations while maintaining appropriate protection for residential amenity. The proposed ASHPs are consequently capable of being appropriately integrated into the development without unacceptable noise effects. Their inclusion also represents a positive component of the scheme, providing an efficient low-carbon heating solution consistent with the wider objectives of reducing carbon emissions and delivering sustainable, energy-efficient affordable homes.
Contamination	Ground condition constraints affecting the site are well understood and have been subject to extensive technical scrutiny by the schemes geotechnical engineer. Significant dialogue has also been had with relevant statutory consultees throughout the previously withdrawn application process (P2024/0623). Natural Resources Wales (NRW) initially raised concerns regarding the previous application due to insufficient information relating to proposed grouting of shallow mine workings beneath the site. These works are now instructed and underway. The results of which shall be submitted during the determination period. NRW had also raised concerns regarding the drainage ditch located to the west of the site and measures to manage potential overland flow during construction works, as well as uncertainty around potential mobile contaminants. The applicants geotechnical engineer updated previous reports to address these matters head on which NRW welcomed. NRW have subsequently confirmed that additional clarification on these matter had been satisfactorily provided within the updated report. In light of the above, it is evident that the outstanding matters raised by NRW relate primarily to the detailed implementation and environmental management of the proposed grouting operations which tie directly to the requests of the Coal Authority. The progression of the grouting strategy, alongside the submission of the further associated technical information requested by NRW, will ensure that the residual risks associated with land contamination, groundwater protection and historic mining legacy are appropriately mitigated and controlled. It is therefore considered that the previous concerns relating to the drainage ditch, potential contaminant migration and the environmental effects of the remediation works have either been satisfactorily addressed already or are capable of being robustly managed through the agreed remediation and verification process, such that no substantive technical or policy conflict remains outstanding.

Coal Mining

The application site lies within the Coal Authority's defined High Risk Area. Intrusive site investigations and trial trenching undertaken by Spencer Quantum Ltd have confirmed that the recorded mine entry (Coal Authority adit ref. 278192-003) is not located within the application site boundary, with the point at which the adit enters below ground understood to lie to the north of the site.

The coal mining legacy affecting the site has previously been subject to detailed consideration. In connection with withdrawn planning application P2024/0623, the Coal Authority reviewed the Technical Advice Note and Remediation Strategy prepared in respect of the site and subsequently withdrew its previous objection, subject to appropriate measures being undertaken to demonstrate that the site would be made safe and stable for the proposed development. A 6m stand-off distance from the identified adit has also been incorporated into the scheme in accordance with the recommendations of Spencer Quantum Ltd and the Coal Authority.

The Coal Authority previously recommended that verification of the required remedial works could be secured by condition, requiring the submission of a signed statement or declaration by a suitably competent person prior to occupation confirming that the site had been made safe and stable and that the necessary mitigation identified by the relevant geo-technical consultants had been completed.

Notwithstanding this previous position, following further discussions with the Local Planning Authority, it has now been agreed that additional assessment of the coal mining and land stability matters will be undertaken during the lifetime of the current planning application. The Applicant has therefore committed to progressing the necessary further technical assessment and investigation whilst the application is under consideration, with the findings and any associated recommendations to be submitted to the Local Planning Authority for consideration prior to determination.

This approach will enable the LPA to consider the additional technical evidence as part of its determination of the application and to be satisfied as to the nature and extent of the identified coal mining constraints, the suitability of the proposed mitigation strategy and the ability of the site to be safely developed for residential purposes.

Importantly, the requirement for further assessment should be viewed in the context of the substantial body of technical work already undertaken at the site. The existing intrusive investigations, trial trenching, Technical Advice Note and Remediation Strategy have established an understanding of the historic mining features affecting the land and have identified a technical pathway for addressing those constraints. Furthermore, the Coal Authority's previous withdrawal of its objection demonstrates that the presence of historic mining features does not, in itself, represent an overriding constraint to residential development, provided that appropriate investigation, remediation and verification measures are undertaken.

The further assessment to be provided during the determination period will therefore build upon the existing evidence base and enable the precise remediation and stabilisation requirements to be confirmed. Where drilling, grouting or other remedial measures are

identified as necessary, these will be incorporated into the development and undertaken in accordance with the recommendations of the suitably qualified geo-technical specialists.

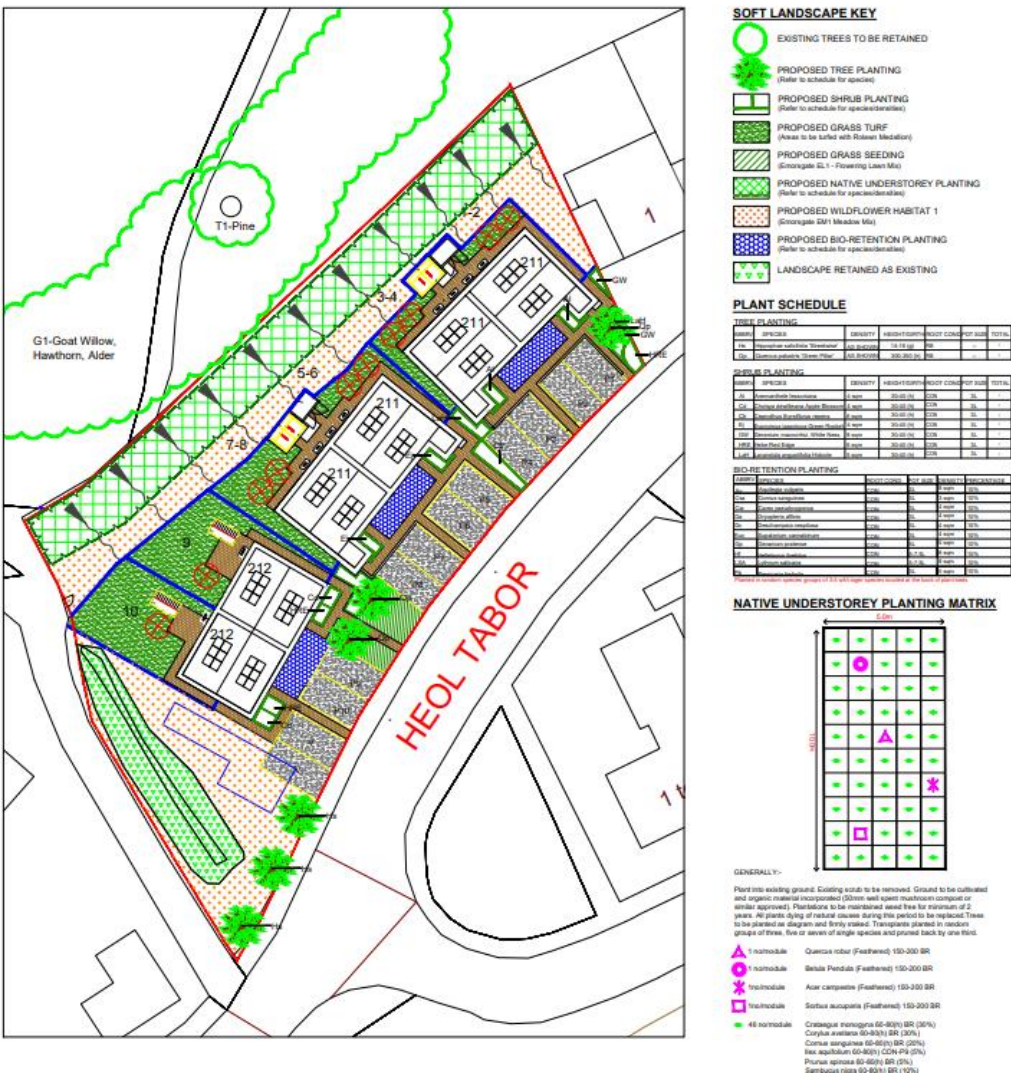
Following completion and consideration of the additional assessment, it may remain appropriate for any planning permission to include suitably worded conditions securing the implementation of the agreed remediation strategy and subsequent verification of the completed works.

This will allow the land stability position to be fully considered prior to determination, whilst detailed implementation and verification requirements can, where appropriate, be controlled through conditions attached to any subsequent planning permission.

Landscaping

The landscaping proposal has been designed with the context of local ecology from the outset and strictly follow the step wise approach of PPW12. Detailed Landscaping Proposals, Green infrastructure Statement and associated Landscape Management Plan have been prepared by Tirlun Design and submitted with this application.

Fig.8 Landscape Proposal (Tirlun Design)



There are no existing trees or hedgerows within the site itself, with the principal arboricultural feature comprising the established off-site woodland adjoining the northern and north-western boundaries. Patchy bramble scrub and areas of neutral grassland are present within the site, particularly around the northern embankment, together with an existing ditch along the western boundary. The existing green infrastructure value of the site is therefore relatively limited, with its principal value arising from its relationship with the adjoining woodland corridor.

The proposed development has been carefully designed in response to this context. Development is concentrated within the lower, previously cleared part of the site, with an undeveloped buffer retained along the northern boundary to provide separation from the woodland edge. Importantly, the Council's Arboriculturist confirmed through the pre-application process that the proposals do not require direct tree removal or significant alteration of the wooded slope, and that the development falls outside the plotted Root Protection Areas of the identified off-site trees. A construction exclusion zone is also provided adjacent to the northern boundary to safeguard the woodland and its rooting environment during construction.

The landscape strategy goes considerably further than simply protecting the adjoining woodland and provides a comprehensive package of new planting and habitat enhancement across the site. A 5-metre-wide native understorey buffer is proposed along the northern boundary, incorporating native whips and feathered trees. Together with adjoining wildflower habitat, this will establish a transitional habitat between the residential development and existing woodland, strengthening the landscape structure and ecological connectivity of the northern boundary.

The proposals include 24 new native trees within the northern understorey planting and a further 13 trees within the development, including avenue street trees. This represents a significant improvement in the arboricultural value of a site which presently contains no established trees within its boundary. The tree planting is complemented by extensive areas of wildflower meadow, wetland planting and flowering lawn, introducing a substantially greater diversity of vegetation and habitat across the completed development.

The landscape strategy also responds positively to the existing habitats identified through the ecological assessment. A proportion of the existing neutral grassland is retained, together with the existing ditch, while the northern bramble scrub will be enhanced through native understorey planting. The loss of other areas of neutral grassland and patchy scrub required to accommodate the development is compensated through the creation of new wildflower, wetland and flowering lawn habitats.

The proposed SuDS infrastructure has also been integrated into the landscape strategy rather than treated as a separate engineering feature. Wetland wildflower planting is incorporated within the SuDS areas, allowing these spaces to perform a multifunctional role in managing surface water while also contributing to biodiversity, visual amenity and the wider green infrastructure network.

	The approach is supported by the Council's Arboriculturist, who considered that the retained northern buffer, native tree and understorey planting, wildflower habitat and SuDS features are likely to provide green infrastructure, landscape and biodiversity benefits while maintaining appropriate separation from the woodland edge. The Council consequently raised no arboricultural objection in principle and concluded that the development is capable of being accommodated without adverse effects upon retained trees or the adjacent woodland resource. Overall, the proposals will transform a vacant and previously cleared site into an attractive residential environment with a strong landscape structure. The development will protect the adjoining woodland, significantly increase tree planting within the site, introduce a wider range of native and biodiverse habitats and strengthen the relationship between the site and the wider green infrastructure network. The long-term establishment and success of the landscape proposals will be secured through the accompanying Landscape Specification and Management Plan, including appropriate maintenance, monitoring and replacement planting. It is confirmed that the proposals accord with PPW12 and policies EN7 and SP16 of the LDP.
Conclusion	Having regard to the queries above, the proposed development represents a carefully considered affordable housing scheme that seeks to redevelop a long-vacant and underutilised site in a sustainable location adjacent to the existing settlement of Cwmavan. The proposal has evolved significantly through engagement with statutory consultees and technical specialists and has been informed by detailed assessments relating to highways, ecology, arboriculture, drainage, ground conditions, mining legacy and landscape matters. The scheme has been designed to respond positively to these constraints whilst delivering a high-quality residential environment that integrates with the surrounding pattern of development. The proposal would facilitate the redevelopment of a vacant and previously disturbed parcel of land which has remained undeveloped despite the benefit of planning permission for residential development. The scheme therefore represents an efficient use of land in accordance with the placemaking and sustainable development objectives of Planning Policy Wales and avoids the need for the release of undeveloped greenfield land to meet affordable housing needs.