

15/09/2026

fao. Claire Hall

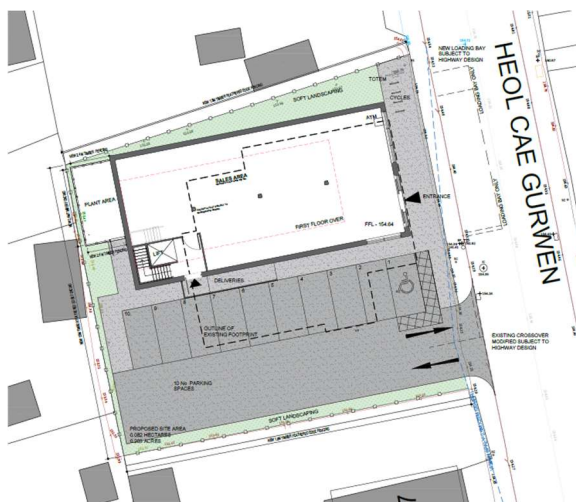
address. Neath Port Talbot Council,
Brunel Way, Briton Ferry,
Neath,
SA11 2GG

Dear Claire Hall

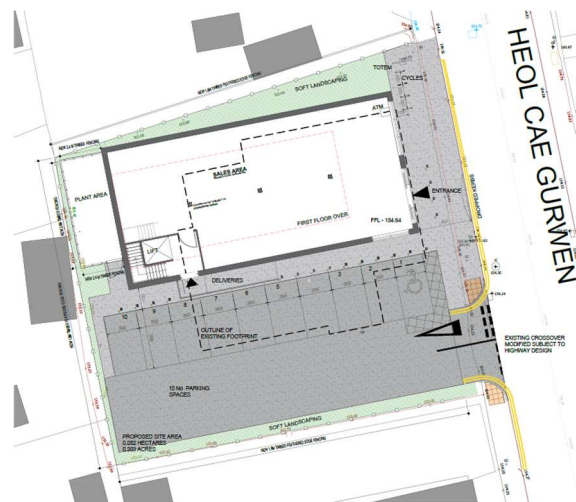
121 Heol-Cae-Gurwen, Gwaun-Cae-Gurwen, Ammanford, SA18 1PD

Further to our recent correspondence and receipt of the consultee responses, please find below our responses to the comments received in relation to application ref. P2026/0420, and all residual issues.

From the outset, it is important to note that, following receipt of the consultee responses, the proposed site layout has been revised to address the comments received. For ease of reference, the originally submitted site layout and the revised layout are presented below.



Submitted Proposed Layout



Revised Site Layout

The changes and revisions to the site layout (and scheme generally) are set out and explained in this submission, albeit (in summary) include and contain changes to the delivery arrangements to the site, whilst attending to any inconsistency in visibility splays etc.

To address the queries raised, this response note sets out the consultee comments received, and those satisfied and attended to by this submission.

For clarity, and ease of reference, consultee comments that do not require a specific response are included within Appendix A at the end of this note. These include:

- Coal Authority;
- Ecology;
- Drainage; and
- Welsh Water.

Accordingly, the consultee comments requiring a response are addressed in turn below (with full responses received set out in Appendix B). The responses requiring response include the following:

- Natural Resources Wales;
- NPT Highways;
- NPT Active Travel;
- NPT Planning Policy;
- NPT Biodiversity; and
- NPT Environmental Health.

Natural Resources Wales

Consultee Comment:

NRW's position is summarised in their consultation response. This is as follows:

- *We have concerns regarding the location of the proposal within a Marine Special Area of Conservation (SAC) catchment. Further details are provided below.*
- *We also have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding European protected species (bats). If this information is not provided, we would object to this planning application. Further details are provided below.*

Impacts on nutrient sensitive SACs

NRW's position is effectively that if your Authority is satisfied that this development should be screened out as not likely to have a significant effect, we would raise no further concerns in respect of nutrient impacts. If it is not possible to screen the development out, an Appropriate Assessment should be undertaken, and we should be re-consulted. If insufficient information is provided to demonstrate that there will be no adverse effect, we may object to this planning application.

European protected species (bats)

We advise that the additional survey work recommended in the report is undertaken and results submitted prior to determination of the application. Surveys should be undertaken in accordance with published best practice. If evidence of bat use is found, suitable avoidance, mitigation, or compensation measures should also be provided as appropriate to the species and their use of the site.

Applicant's Response

Impacts on nutrient sensitive SACs

In respect of nutrient neutrality, it is important to recognise that the lawful existing use of the site is as a club / events venue. Accordingly, the site could recommence operation in its existing lawful use at any time without the need for further planning permission. As evidenced by the submitted Nutrient Neutrality Assessment, the total nitrates

generated by the existing club is 3.11 kg tn/year, whilst the total nitrates generated by the proposed development is 2.22 kg tn/year.

It is concluded by the Nutrient Neutrality Assessment that *"Based on this analysis it is evident that the proposed redevelopment will provide betterment in terms of Total Nitrates, achieving a betterment factor of 1.40 and achieves nutrient neutrality."*

Accordingly, the proposal does not have a risk of, or significant effect on, increasing nutrients – indeed a betterment. As such this is not considered to be a constraint on the proposal (see response to NPT Biodiversity later for further commentary).

European protected species (bats)

The further bat survey work undertaken, and the resulting report, has been submitted. The key findings of this can be summarised as follows:

- The building was found to be in poor condition with much of the rear roofs missing and multiple openings to the interior;
- No bat roosts were recorded at the site; and
- Bat activity to the front of the building was very low;

In light of the above findings, it is considered that bats do not pose a constraint on the development, and that NRW's requirement for the further work to be undertaken and submitted are satisfied. Moreover, the findings of this work (notwithstanding that no bats have been identified) have informed the enhancement measures that are proposed as part of the scheme proposals.

NPT Highways

Consultee Comment:

NPT Highway's position can be summarised as follows:

- The submitted proposal provides only ten parking spaces, resulting in a significant shortfall against the adopted parking standards;
- Insufficient evidence has been provided to demonstrate that the parking shortfall can be accommodated without adverse impacts on the operation and safety of the highway network;
- The minimum parking bay dimensions shall be 4.8 metres by 2.6 metres, and the submitted layout should clearly demonstrate compliance with these standards;
- Concerns are raised regarding the proposed on-street loading bay;
- The submitted Transport Statement states that visibility splays of 2.4 metres x 90 metres can be achieved. However, the Proposed Site Plan identifies a visibility splay of 2.5 metres x 25 metres (20mph), resulting in a discrepancy between the submitted documents.

Applicant's Response

Car Parking

In terms of car parking, it is noted that the development has a shortfall of 4 no. car parking spaces.

Turning to the previously approved application on site (ref. P2023/0586) – which also had a shortfall of 4no spaces – the previous Officer report notes the following:

"Whilst the application has not provided a sustainability appraisal to otherwise justify this shortfall, it is evident (from both the submission and the location of the proposed development) that the site is well served by public transport with a number of bus stops within close walking distance."

It was then concluded that:

"On balance therefore, and giving consideration to the site's lawful use as a public house, it is not considered that a refusal on car parking grounds is warranted or necessary in this case."

Accordingly, and noting that the previous approval comprised residential development, where vehicles would undoubtedly be parked for longer periods of time, the acceptability of a 4-no. space shortfall has already been established by the Council.

As the current proposal results in the same parking shortfall, and with 'top up shoppers' spending far less time parked at the site, there appears to be no material basis for reaching a different conclusion.

Moreover, the existing lawful use will generate a far greater parking requirement than the proposed use and development. The shortfall in the case of the proposal is far less in relative terms.

Finally, the response of the NPT Active Travel Officer sets out the following:

"The site is located within an established settlement and is in proximity to existing pedestrian infrastructure, public transport facilities, National Cycle Network Route 437 and a proposed future Active Travel Network Map (ATNM) route."

Given the above, and given the recorded recognition and acceptance of the accessible and sustainable location of the site, it is not considered that the shortfall is significant, and would not warrant refusal of the application – this is not least given the national planning policy move towards minimum as opposed to maximum standards and provision.

On Street Parking effects

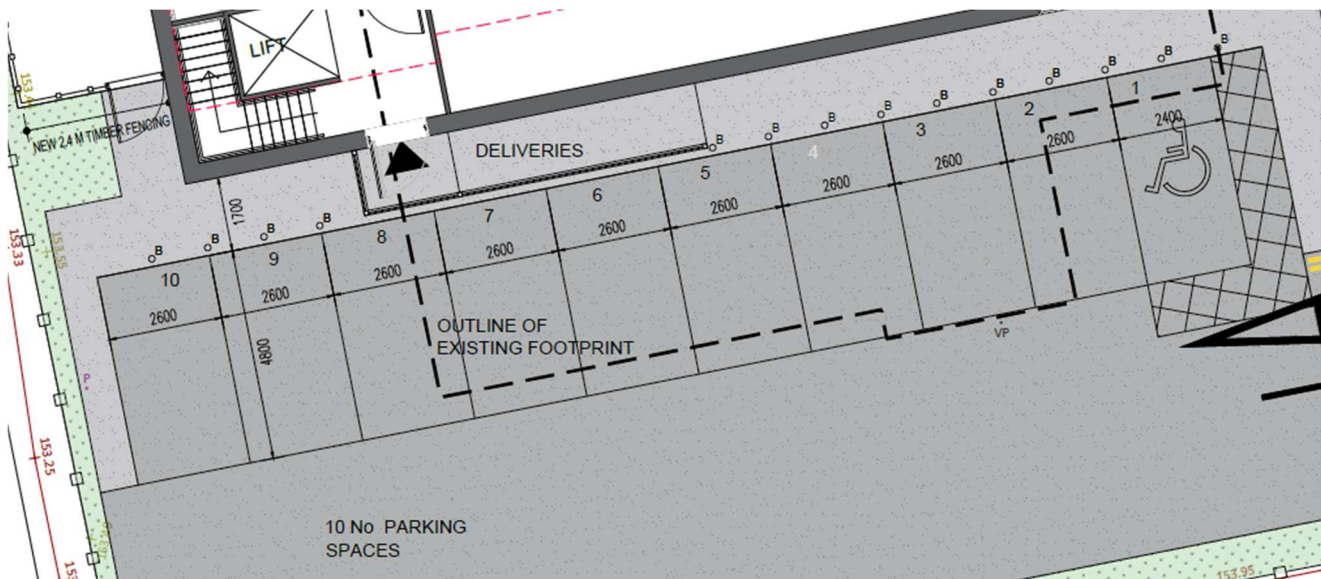
Any overspill parking associated with the development, which in any event is considered unlikely given the scale and number of car parking on-site spaces proposed as a part of the proposal, can be adequately accommodated within the highway.

The Transport Statement prepared and submitted records that on-street parking levels are light. Given this, it is considered that there can be no assertion that the proposal would exacerbate existing parking and traffic management issues, leading to increased obstruction of the highway and reduced operational efficiency of the road network. There are no evidenced existing parking and traffic management issues, whilst any on street parking that might take place would not obstruct the highway and reduce its operational efficiency.

Double yellow lines are proposed along the site frontage – to ensure that no on-street parking hinders access to and from the site, and / or impedes on street deliveries (when undertaken). The double yellow lines are proposed in lieu of the previously proposed on-street delivery bay, and will work and function effectively and safely – much in the same way as all commercial premises along the road corridor function (and for that matter home deliveries – both food shopping and postal deliveries to residential properties).

Parking Dimensions

Please see the updated site plan below which demonstrates adequate parking dimensions can and will be achieved and accommodated:



As can be seen and noted, and as annotated on the drawing, each and all spaces conform to the minimum size dimensions (4.m in length x 2.6m in width).

On-street Loading Bay

In relation to the proposed on-street loading bay, and as set out above in respect to the on-street parking concerns, (and with reference to the revised site layout plan submitted and included at the beginning of this note), this element has since been removed and replaced with double yellow lines along the frontage of the development. This amendment has been made to address concerns regarding potential operational efficiency of the road network.

Whilst any overspill is considered unlikely, the proposed double yellow lines will ensure that no on-street parking can occur as a result of the development, hence preventing and ensuring any disruption to the entry and exit to the site. By removing the dedicated and delineated on-street loading bay, there will be no 'permanent' facility proposed for this activity. Rather, as is permissible, a deliveries will use the restricted parking length of frontage when servicing the site. Such use will be infrequent and not of any scale – given the proposed offer of the site and premises.

As the previously proposed on-street parking/loading bay no longer forms part of the scheme, it is considered that the proposed double yellow lines will not give rise to any adverse impacts on the operation, capacity, or safety of the surrounding highway network.

With regard to the delivery process itself, the comment from highways states that "*deliveries should be accommodated within the site, with the customer car park temporarily closed during delivery operations. Delivery vehicles should reverse into the site and exit in a forward gear under the supervision of a suitably trained banksman, thereby minimising disruption to highway users and reducing potential road safety concerns.*"

In response, it is considered that deliveries undertaken from the public highway represent the safest and most practical arrangement in this instance. Requiring delivery vehicles to reverse into the site would introduce additional highway safety risks and potential disturbance to neighbouring occupiers, particularly given the manoeuvring required and the likely use of reversing alarms. It will also render the car park unusable for the duration of the delivery process – potentially leading to greater instance of over spill car parking into the highway.

Notwithstanding this, delivery vehicles are expected to occupy the on street area for a relatively short duration, typically no more than approximately 30 minutes per visit.

Accordingly, it is considered that the omission of the loading bay and its replacement with double yellow lines represents the most appropriate arrangement for servicing the site.

Visibility Splays

To avoid any confusion and inconsistency between plans and outputs, the visibility splays have been removed from the revised site layout plan. This does not alter the proposed access arrangements, given that the required visibility splays of 2.4m x 90m can and will still be achieved – in accordance with, and as documented within the submitted Transport Statement.

Accordingly, there are no highway safety concerns arising.

As an aside and in combination, pedestrian vision splays can be achieved and implemented, and are set out in the submitted material.

In respect to the needs for a Road Safety Audit, the applicant is content and agreeable to the imposition of a suitably worded condition to require the preparation, submission, and approval of such detail following determination of the application (as is a/the common approach to such matters).

NPT Active Travel

Consultee Comment:

It should be noted at the outset that the Active Travel response is not an Objection, rather it sets out some concerns regarding the detail of the scheme (and need to demonstrate and document this).

The response can be summarised as follows:

- limited information has been provided regarding how the development will physically connect to, support or safeguard the active travel routes. The applicant should demonstrate how the site layout and frontage design can facilitate future integration with the proposed ATNM route identified adjacent to the site and ensure that opportunities for future active travel improvements are not prejudiced, and that safe, direct and accessible pedestrian routes are provided between the development and bus stops to encourage sustainable multimodal journeys and reduce reliance on the private car are achievable;
- cycle parking is proposed as part of the development; however, there is inconsistency across the submitted documents regarding the quantity and arrangement of cycle parking provision. Clarification should therefore be provided;
- consideration should be given to incorporating appropriate wayfinding measures to support walking and cycling journeys. Signage should clearly identify local active travel connections and key destinations where appropriate;
- particular attention should be given to pedestrian priority at the site access, ensuring that pedestrian routes remain continuous, legible and accessible for all users, including disabled people, older people and those travelling with pushchairs. Dropped kerbs and tactile paving should be provided at all crossing points for accessibility; and
- the following details should be provided:

Footway and carriageway dimensions;

Parking bay dimensions;

Cycle parking details (location, type, and capacity)

Gradients of pedestrian routes and access points.

Loading Bay and delivery details – i.e. are there dropped kerbs from the footway to the loading Bay, when would deliveries likely occur as this would affect visibility and usage of cycle parking/walking

routes, is there consideration for how the loading Bay may limit visibility within vision splays from the existing crossover

Applicant's Response

Connectivity to active travel routes

The site and surrounds is generally level, with no significant changes in ground levels. As such, pedestrian and cycling routes can be provided with appropriate gradients, ensuring convenient and accessible movement throughout the development. It is considered that the location, and the surrounding topography, will ensure that pedestrian and cyclist journeys to and from the site will be maximised.

Safe, direct and accessible pedestrian connections already exist between the site and the surrounding residential area / bus stops via the existing footway network. The road frontage benefits from dedicated footways on both sides of the road, and in both directions. These routes are accessible and safe, not least given the natural surveillance afforded by the numerous residential properties that front onto the corridor.

The below visuals demonstrate how the proposal would interact with the existing footway connections at the site frontage – providing level, convenient, legible, useable and inviting access to and from the proposed store:

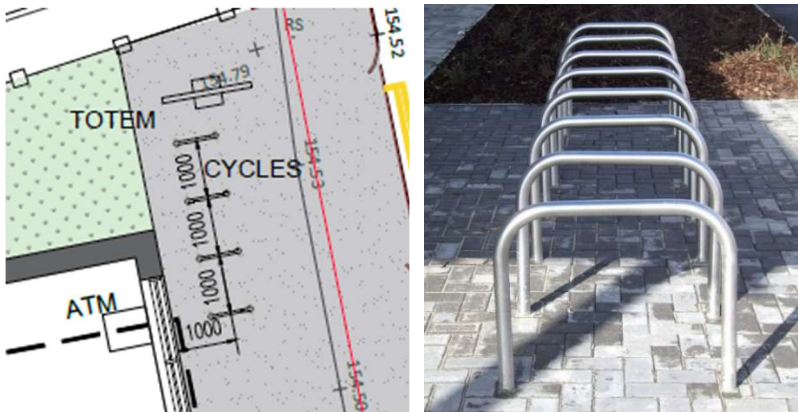


Visuals

Cycle Parking & Provision

In regard to cycle parking, 4 no. cycle stands are proposed, providing space for up to 8 bicycles and therefore meeting the requirements of the Active Travel Act Guidance. Whilst the exact specification of the cycle storage has not yet been finalised, this detail can be secured by condition to ensure compliance.

For ease of reference, the revised plan and an example of a suitable cycle stand that will be implemented has been provided as follows.



Cycle Parking Location & Example provision

Wayfinding measures

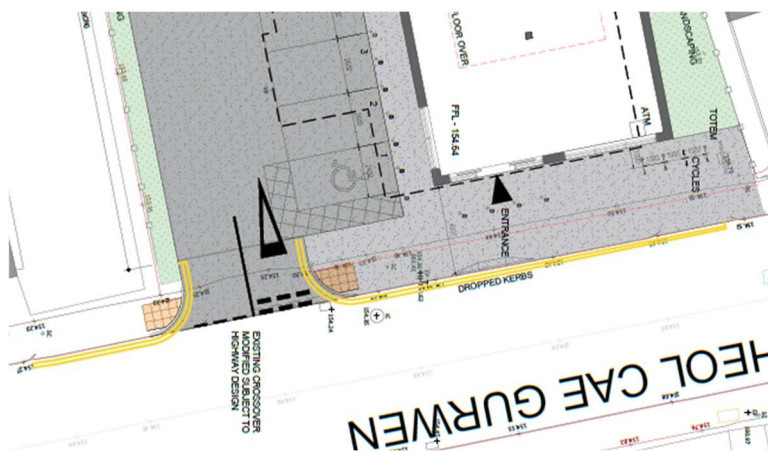
It is considered that such measures, both inside the store, and externally, can be provided. A combination of operator information boards and details, together with external signage, can be secured by condition – such that other destinations beyond the store can be easily and readily identified. This can and will include the presence and location of the designated centre, and the other retail and commercial facilities that the store will combine with, and compliment.

Such detail can and will be capably secured by planning condition.

Pedestrian priority at the site access & throughout

As evidenced by the revised plans and drawings, the scheme makes clear that there is considerable provision for pedestrian connectivity across and throughout the site. The following plan extract shows and depicts the following:

- A site frontage area that provides level, convenient, legible, useable and inviting access to and from the proposed store;
- Dedicated and convenient / accessible cycle parking;
- Footways and carriageways of adequate and useable dimensions;
- Pedestrian routes and access points that are level and of a suitable gradient;
- Pedestrian vision splays; and
- Dropped kerbs and tactile paving at all crossing points for accessibility.



Other details

As set out above, and as demonstrated by, and documented within, the revised scheme proposals and plans etc, the following details are all addressed satisfactorily: footway and carriageway dimensions; parking bay dimensions; cycle parking details (location, type, and capacity); gradients of pedestrian routes and access points.

Revisions to the form of the loading bay and delivery details such that there will be no conflict – as set out in detail earlier.

Summary

To summarise, the proposal will provide suitable and accessible active travel (pedestrian and cycling) routes and facilities throughout the development, and as an integral part of the scheme.

This, in the context of the recognition that the site is located within an established settlement and is in proximity to existing pedestrian infrastructure, public transport facilities, National Cycle Network and a proposed future Active Travel Network Map (ATNM) route will ensure that the development will function sustainably and suitably.

Planning Policy

Consultee Comment:

NPT Planning Policy's position can be summarised as follows:

- Retail need: It is considered that the applicants have provided sufficient information to show that a quantitative need exists in the area for further convenience goods retailing, supplemented by additional qualitative justification to satisfy criterion1 of the policy.
- Sequential test: two alternative edge of centre sites have been identified in GCG that could potentially accommodate the proposal and would be sequentially preferable. It is considered that insufficient information has been provided to show that the sites are not available or to demonstrate that either site (or the two sites combined) could not provide a viable and preferable location for the development."

As noted above, the quantitative case for additional provision of a / the proposed store in this location has been made. The residual issues therefore relate to whether there are any sequentially preferable sites that are suitable, viable, and available to accommodate the need.

This response accordingly addresses the residual sequential assessment concerns – over and above, and in addition to, the submissions made previously.

Applicant's Response

As per the submitted Planning Statement, which considered and evidenced the position in respect to sequential site assessment in detail, the following is set out:

"Firstly, in respect of the Water Street site, and as set out within the additional information submitted at pre-application stage, contact was made with the developer who secured planning permission app ref. P2022/0726, for the proposed 'Residential development of 10 dwellings with associated parking and works'. This scheme for redevelopment of the site was approved on 12 December 2024. The landowner / developer confirmed in response to our approach and enquiry regarding the availability of the site, the following: "Our intention is to develop the site for residential houses as per the approved planning." It is clear therefore that this site is not available or suitable.

With respect, it is considered that this places an unreasonable, evidential burden on the applicant. Clear confirmation was provided by the developer that they intend to implement the extant residential permission, which was granted following recent determination and following a lengthy and protracted planning process. The expectation that the applicant should further explore or promote alternative commercial uses on land controlled by an unrelated third party—particularly where that landowner has an active and approved development proposal—is neither practical nor proportionate. As such, it is reasonable to conclude that the Water Street site is not available or suitable as a sequentially preferable alternative.

Given the above, it is considered that the position has been assessed and evidenced compellingly – in that neither site identified as being potentially sequentially preferable would be suitable, available, or deliverable.

1. The site is very small and will not allow adequate parking;

2. Parking that is possible will need to be accessed over the pavement as there is insufficient space to allow a dedicated street / isle access;
3. Deliveries will need to be on street and as there is no turning area suitable the lorry would have to reverse off the main street down Water Street. This is also a zigzag protected crossing area so deliveries from the front are not possible;
4. There is a significant amount of BT equipment at the front and side of the site which will restrict access further;
5. The site is currently walled to its frontage; this will need to be removed to allow pedestrian and vehicular access; and
6. The existing trees on site will need to be removed.

Accordingly, the site is not suitable – being too small for the proposed development. Only 5 parking spaces would be capably provided – representing a 9 space shortfall as compared the requirement, and moreover would result in the loss of the existing public car park facility (which serves, and functions with, the centre). Some 15 or so car parking spaces would be ‘lost’ in the process, which (combined with the shortfall in provision) would result in a deficit of some 24 spaces less than existing and required.

In terms of the Water Street (former school) site, the suggestion that *“insufficient information has been provided to show that the sites are not available”* is respectfully not accepted.

Contact was made with the developers of the Water Street site, going beyond what would ordinarily be required as part of the sequential assessment process. The developers confirmed that the site will be built out in accordance with the extant planning permission (for residential) and, accordingly, cannot reasonably be considered available to accommodate the proposed development.

Furthermore, the site is located within, and would be accessed from, a tight no through road residential cul-de-sac. The street already accommodates a level of on-street parking, with vehicles parked along one side of the carriageway, as shown in the images below. The cul de sac has no turning head or facility, rendering on street manoeuvring of delivery and customer car movements difficult and compromised.



Water Street Site Access



The proposed development would therefore introduce additional vehicle movements onto a road that primarily serves existing residential properties, giving rise to highway, and amenity issues.

In light of the above, it is considered that the application site represents the most appropriate and deliverable location to accommodate the proposed development. The suggestion that the development could instead be located on either of the alternative sites is unrealistic and undeliverable in practice. One of the alternative sites is to be developed in accordance with an extant planning permission, and it has been confirmed that this scheme will be implemented. The other site is of insufficient size to accommodate the proposed development and would, in any event, give rise to a number of issues.

Accordingly, there are no suitable alternative sites available that would represent a preferable location for the proposed development, and the application site remains the most appropriate option.

NPT Biodiversity

Consultee Comment:

"While we welcome the submission of the Nutrient Neutrality Assessment, it has come to my attention that the site has not been used as a club in many years (sorry for not noticing this sooner). As the previous use was prior to the SAC failing, we can not use the assessment provided as the site currently has no nutrient loads which we need to compare against. Therefore, it fails the HRA screening, and we cannot grant permission."

Applicant's Response

The lawful planning use of the site remains as a club/events venue, and no material change of use has occurred. The fact that the premises have not operated for a period of time does not remove the lawful fallback position that the use could recommence at any time without requiring planning permission.

It is therefore not appropriate to assume a zero nutrient baseline solely on the basis of temporary non-operation. The relevant baseline for Habitat Regulations Assessment purposes should be the site's lawful existing use, against which the proposed development should be assessed.

The submitted Nutrient Neutrality Assessment demonstrates that the lawful existing club use generates 3.11 kg TN/year, compared with 2.22 kg TN/year from the proposed development. The proposal therefore results in a reduction in nitrate loading of 0.89 kg TN/year, representing a betterment factor of 1.40.

Notwithstanding the above, and in the event it is considered that the site has no nutrient loads, the site has previously been approved for the *"Demolition of existing derelict 3 storey building and replacement with 3 storey apartment building (comprising 4no. 2-bed on ground and first floor and 2no 1-bed at top floor) together with a detached dwelling all with associated works and car parking"* – application reference. P2023/0586)

Given that this permission was granted on 02 Oct 2023, it could lawfully be implemented until 2028. Accordingly, the nutrient loading associated with the approved residential development would be substantially greater than that arising from the proposed retail use.

In light of the above, it is considered that the lawful use of the site itself represents the primary fallback position. In the event that this position is not accepted, the alternative residential development of the site would also give rise to a higher level of nutrient generation than the development now proposed.

The proposal therefore results in a clear reduction in nitrate loading when compared with either of the lawful fallback scenarios and provides a demonstrable nutrient betterment.

This is a position accepted in the region – where the lawful use of a building (even if unoccupied at the time of applying for planning permission) is capably accounted for in assessing nutrient loading and capacity. One such case example is the change of use and conversion of Crown Building Llanelli (Planning Application Ref : PL/09492: Affordable Housing Scheme Comprising the Change of Use of the Existing Office (B1) Building to Provide Residential Apartments, and the Demolition of a 3 Storey Structure for Associated Parking Use.

In this case, having considered the figures used in the screening flows calculator and the justifications, it was concluded by the LPA Ecologist that "the development will not lead to an increase in foul flows, is unlikely to increase nutrients and can be screened out of further HRA processes."

It is considered that the above approach can and ought to be deployed in this case, and it held that there will be a betterment in the position accordingly.

NPT Environmental Health

Consultee Comment:

NPT Environmental Health's position can be summarised as follows:

Overall Recommendation : We require additional information in relation to noise.

The application includes a plant area but we have not been provided with a noise impact assessment in accordance with BS4142 for the potential noise source. In our opinion this information should be provided prior to determination of the application to allow for conditions if necessary for mitigation and controls.

Applicant's Response

It should be noted that the response does not raise any issues in respect to Contaminated Land and / or Air Quality – the other two 'fields' of the consultees remit.

In respect to noise, the following is set out.

Noise

In response to the consultation response, a 'Noise Note' has been prepared and is submitted alongside this response. This sets out further details on the plant area, the equipment to be used, the setting within which the area will function, and any potential for noise impacts associated with the proposal.

Given that the proposed store will be laid out, and will function as all Tesco Express stores will and do, it is possible to know and define the plant and equipment to be installed, and their likely noise levels etc.

Having regard to this, and to the detail set out in the Noise Note it is considered that the proposed plant would not give rise to significant adverse noise effects or an unacceptable impact upon the living conditions of neighbouring residential occupiers. This is as a result of the following:

- the nature and specification of the proposed refrigeration and air-conditioning plant;
- the manufacturers' noise data available for comparable equipment;
- the substantially greater separation distance between the proposed plant and the nearest residential properties when compared with the previously assessed comparable scheme;
- the proposed timber boundary fencing and intervening soft landscaping, which will provide acoustic screening and suppression;
- the low operational noise characteristics of modern refrigeration and air-conditioning plant; and
- the findings of the comparable noise assessment undertaken in support of Application Ref. 31258/009.

The proposal is therefore considered acceptable in respect of noise and residential amenity.

Notwithstanding the above, and in the interests of ensuring that the development does not give rise to unacceptable noise impacts, it is considered that a suitably worded condition can be imposed requiring details of all plant and machinery to be submitted to, and approved in writing by, the Local Planning Authority prior to the commencement of operation.

Conclusion

The responses set out above methodically, comprehensively, and adequately address the matters raised by consultees.

Accordingly, there are no outstanding issues that would prevent the determination of the application, and we respectfully request that the application is approved.

If any further information or clarification is required, please do not hesitate to get in touch.

Yours sincerely,



Geraint John
Director
Geraint John Planning Ltd.

Appendix A – Additional Responses (Not requiring response)

Coal Authority

Consultee Comment:

"The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make.

However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant."

Response

"We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area" – No concerns raised.

NPT Ecology

Consultee Comment:

"As stated in section 7 of the Preliminary Ecological Appraisal including Daytime Bat Walkover, up to date bat surveys are required before we can determine this application."

Response

The Bat Survey has since been submitted to the Local Planning Authority, with the following findings identified:

"No bat roosts were recorded at the site, and the survey effort was deemed sufficient to conclude that bat roosts are likely absent."

"Therefore demolition of the building would be likely to have a negligible risk of disturbing bats or their roosts."

"Bat activity at the site was relatively low and the proposed redevelopment would be unlikely to cause significant impacts to bat foraging or commuting habitats."

In light of the above findings, it is considered that bats do not pose a constraint on the development.

NPT Drainage

Consultee Comment:

No comment	☐
No objection (subject to any specified conditions below)	☒
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☐
Objection – on the grounds set out below	☐
SAB (SAB approval is required)	☒

Response

No objection raised - noted on SAB approval being required.

Dwr Cymru Welsh Water (DCWW)

Consultee Comment:

"We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

Firstly, with respect to the submitted application form and accompanying plans, we acknowledge that the development proposes to discharge foul and surface water flows to the sewer.

The proposed development site is located in the catchment of a public sewerage system which drains to Garnswllt Wastewater Treatment Works (WwTW) and ultimately discharges to a river Special Area of Conservation (SAC). We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the immediate public sewerage system, whereas the WwTW has a phosphorus consent limit. However, the WwTW is currently failing to comply with the 95% quartile for its flow passed forward (FPF) performance, at the time of this consultation.

Turning to surface water drainage, as of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. However, in this instance, we would advise that there is no agreement to communicate surface water flows into the public sewer. Accordingly, as a material consideration within the planning process and notwithstanding the submitted application form, we recommend a condition that specifies no surface water flows shall communicate directly or indirectly to the public sewerage system.

Accordingly, if you are minded to grant planning consent for the above development, we would request that the following Condition(s) and Advisory Notes are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets:

Condition

No buildings on the application site shall be brought into use earlier than 31/12/2027, unless the upgrading of the public sewerage system, into which the development shall drain has been completed and written confirmation of this has been issued to the Local Planning Authority by Dwr Cymru Welsh Water.

Reason: To prevent further hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment. No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment."

Response

Noted – Happy to accept an appropriately worded condition.

Appendix B – Responses requiring response

Natural Resources Wales (NRW)

We have concerns regarding the location of the proposal within a Marine Special Area of Conservation (SAC) catchment. Further details are provided below.

We also have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding European protected species (bats). If this information is not provided, we would object to this planning application. Further details are provided below.

Impacts on nutrient sensitive SACs

NRW has published updated conservation advice (Regulation 37 advice) for marine Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

The discharge from the proposed development would be within a river catchment for the Burry Inlet Inner of the Carmarthen Bay and Estuaries SAC.

The marine water body has been identified as having ecological features sensitive to high levels of nutrients, where elevated levels of nitrogen have been recorded and a biological response to this observed. Increases in nitrogen discharges in freshwater catchments draining to the marine water body may contribute to the failure of the site to meet its conservation objectives.

In line with our Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within these SAC catchments.

In the first instance, we refer you to the section titled 'What development proposals are unlikely to increase nutrient levels within a river SAC?'. Please note that this advice is equally applicable to marine SACs. If having considered that Advice, your Authority is satisfied that this development should be screened out as not likely to have a significant effect, we would raise no further concerns in respect of nutrient impacts. If it is not possible to screen the development out, an Appropriate Assessment should be undertaken, and we should be re-consulted. If insufficient information is provided to demonstrate that there will be no adverse effect, we may object to this planning application.

European protected species (bats)

We have concerns about the above proposal and advise that further information is submitted in support of the application to assess the impacts of the proposal on bats, a European protected species. Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

We have reviewed the following information submitted in support of the application:

- Preliminary Ecological Appraisal including Daytime Bat Walkover by Gould Ecology Ltd, dated June 2026

We note that the report has identified that bats may be present at the application site. However, Section 7 of the report advises that further survey work is required in the form of 2 dusk emergence surveys. We concur with this advice.

We advise that the additional survey work recommended in the report is undertaken and results submitted prior to determination of the application. Surveys should be undertaken in accordance with published best practice. If evidence of bat use is found, suitable avoidance, mitigation, or compensation measures should also be provided as appropriate to the species and their use of the site.

Based on the application, as submitted, we are unable to provide you with any assurance that the proposal would not be likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Other matters

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

If you have any queries about the above, please do not hesitate to contact us.

NPT Highways

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐

"MY HIGHWAYS OBSERVATIONS ON THIS PROPOSAL ARE AS FOLLOWS:-

The following concerns have been identified in relation to the proposed development of new retail store at 121 Heol Cae Gurwen:

1. The proposed development does not comply with the Neath Port Talbot County Borough Council (NPTCBC) Parking Standards (October 2016). The site is located within Zone 4 and has a gross floor area of 294m². In accordance with Section 4.3 – Shops, the minimum parking requirement for a development of this nature is two commercial vehicle spaces, fourteen non-operational parking spaces, one disabled parking space and appropriate cycle parking facilities. The submitted proposal provides only ten parking spaces, resulting in a significant shortfall against the adopted parking standards.

2. The applicant has sought to justify the parking shortfall on the basis that overflow parking can be accommodated on the adjacent highway. This is not considered acceptable. Whilst the Transport Statement states that on-street parking levels are relatively light, this does not reflect existing conditions, with significant on-street parking already occurring along Heol Cae Gurwen from residential and commercial uses. The proposed development is therefore likely to generate additional overspill parking, further increasing congestion, restricting traffic flow and giving rise to highway safety concerns on this busy A-classified route. Insufficient evidence has been provided to demonstrate that the parking shortfall can be accommodated without adverse impacts on the operation and safety of the highway network.

3. All parking spaces shall be designed in accordance with Neath Port Talbot County Borough Council Parking Standards (October 2016), Appendix C. The minimum parking bay dimensions shall be 4.8 metres by 2.6 metres, and the submitted layout should clearly demonstrate compliance with these standards.

4. Concerns are raised regarding the proposed on-street loading bay. This section of Heol Cae Gurwen is a busy main road which is already subject to significant on-street parking pressures. The introduction of a formal loading bay is likely to further reduce available parking provision and could exacerbate existing parking and traffic management issues, potentially leading to increased obstruction of the highway and reduced operational efficiency of the road network. In light of the known parking constraints, the Highway and Traffic Management Section does not support the provision of a dedicated on-street loading bay. Instead, deliveries should be accommodated within the site, with the customer car park temporarily closed during delivery operations. Delivery vehicles should reverse into the site and exit in a forward gear under the supervision of a suitably trained banksman, thereby minimising disruption to highway users and reducing potential road safety concerns.

5. The submitted Transport Statement states that visibility splays of 2.4 metres x 90 metres can be achieved. However, the Proposed Site Plan identifies a visibility splay of 2.5 metres x 25 metres (20mph), resulting in a discrepancy between the submitted documents. The required visibility splay shall be provided in accordance with TAN 18: Transport, which for a road subject to a 30mph speed limit requires visibility splays of 2.4 metres x 90 metres in both directions. There shall be no obstruction exceeding 600mm in height within the visibility splays in order to maintain safe and unobstructed visibility for vehicles exiting the site.

6. Pedestrian vision splays of 2.4 metres by 2.4 metres (measured back from back of footway) shall be provided and maintained each side of each access within which nothing over 600mm in height shall be erected or allowed to grow.

7. All works to be constructed on the public highway shall be subject to Road safety Audits, stages 1 to 4 in accordance with Design Manual for Roads and Bridges. Road Safety Audits Stage 1 and 2 need to be submitted within the planning application. Each stage of the Road safety Audit shall be submitted for approval in writing by the Local planning Authority. All issues highlighted at each stage, being addressed to the written approval of the Local Planning Authority within 3 months of that stage of that Road safety Audit has been approved.

NPT Active Travel

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐

"1. Legislation, Policy, Guidance & Design Standards:

1.1. In line with Welsh Government legislation, all walking and cycling infrastructure must be designed in accordance with the Active Travel Act Guidance (ATAG), as set out under the Active Travel (Wales) Act 2013.

Aligned with Planning Policy Wales, the ATAG ensures that all new public and private developments - whether mixed-use, housing, employment or public services - are masterplanned, laid out and designed for full walking and cycling accessibility. It covers both on-site provisions and connections to nearby services, facilities and the wider active travel network.

For further information, visit Neath Port Talbot's Active Travel webpage

2. Active Travel links in the area

2.1 The Councils Active Travel Network Map (ATNM) shows a future route (dotted lines) in the vicinity of the proposed development.

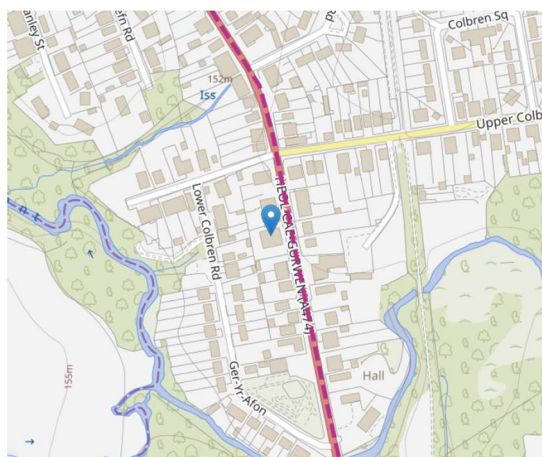
•Future Routes: These are proposed routes that either don't yet exist or need improvements to meet the required standards.

Permeable Network & Direct Routes to Key Destinations:

The Neath Port Talbot ATNM shows one route within 500m of the site as follows:

•FR-GCG-SU003 – Future walking and cycling route along Heol-Cae-Gurwen linking the nearby residential areas of Gwan-Cae-Gurwen and Cwmgors up via Heol-y-gors (A474) and the existing walking and route and future cycle routes along that path

2.2. The snapshot below from DataMapWales illustrates the route as mentioned above:



3. Accessibility

3.1 The site is located within an established settlement and is in proximity to existing pedestrian infrastructure, public transport facilities, National Cycle Network Route 437 and a proposed future Active Travel Network Map (ATNM) route. As such, the development should be expected to make a positive contribution to walking, wheeling and cycling connectivity in accordance with the Active Travel (Wales) Act and associated Guidance

Whilst the submitted documents acknowledge the presence of future active travel routes in the vicinity of the site, limited information has been provided regarding how the development will physically connect to, support or safeguard these routes. The applicant should demonstrate how the site layout and frontage design can facilitate future integration with the proposed ATNM route identified adjacent to the site and ensure that opportunities for future active travel improvements are not prejudiced

Cycle parking is proposed as part of the development; however, there is inconsistency across the submitted documents regarding the quantity and arrangement of cycle parking provision. Clarification should therefore be provided. The applicant should demonstrate that sufficient secure and convenient cycle parking is provided for both staff and customers in accordance with Welsh Government Active Travel guidance and best practice standards.

Given the site's proximity to National Cycle Network Route 437 and the future ATNM route, consideration should also be given to incorporating appropriate wayfinding measures to support walking and cycling journeys. Signage should clearly identify local active travel connections and key destinations where appropriate.

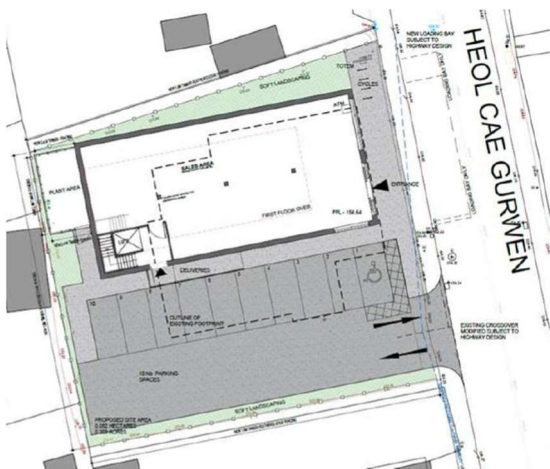
3.2. The application should provide safe, direct and attractive pedestrian connections between the proposed retail unit and the surrounding residential area. Particular attention should be given to pedestrian priority at the site access,

ensuring that pedestrian routes remain continuous, legible and accessible for all users, including disabled people, older people and those travelling with pushchairs.

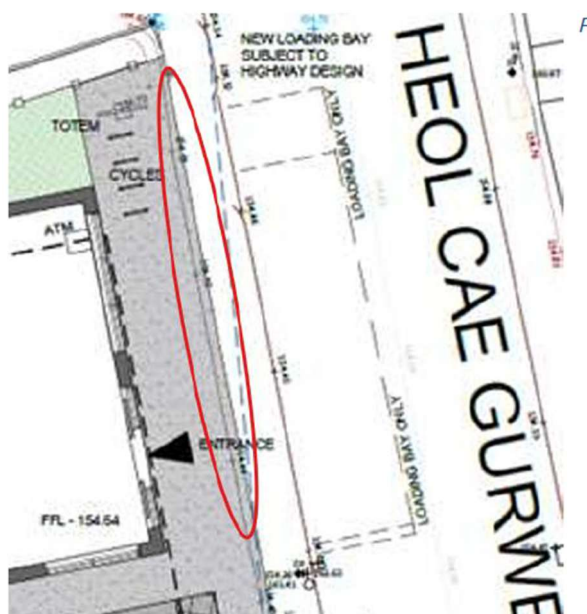
3.3. The submitted Transport Statement identifies bus stops on Heol Cae Gurwen within approximately 200 metres of the site. The applicant should demonstrate that safe, direct and accessible pedestrian routes are provided between the development and these bus stops to encourage sustainable multimodal journeys and reduce reliance on the private car.

4. Internal Layout

4.1. Any footways within the site should be a minimum of 2m wide, continuous, and link all entrances, parking areas and outdoor spaces. Based on the documentation provided it is unclear whether this is the case. Within the attachments there is no proposed site plan, however there is reference to one within the GJP Planning Statement June 2026 document (Screenshot attached below).



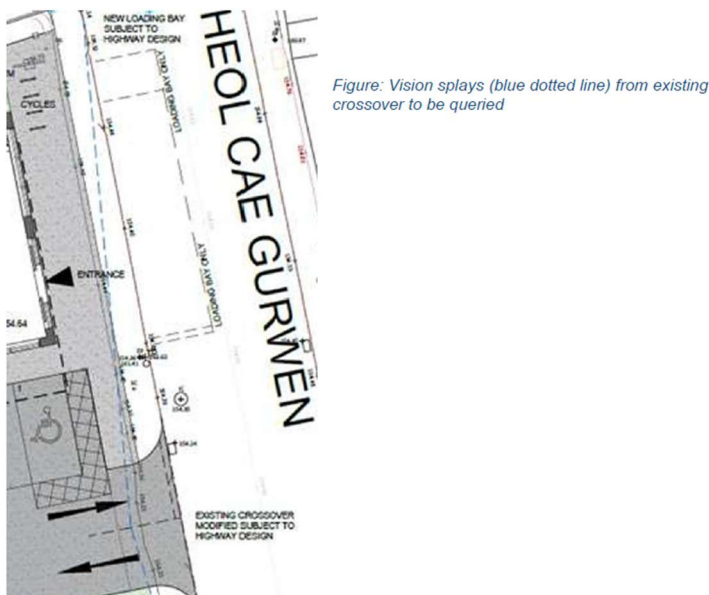
4.2. Dropped kerbs and tactile paving should be provided at all crossing points for accessibility. This would include at the Cross Junction and at the loading Bay





4.3, Please provide a detailed General Arrangement Plan (or similar) for the proposed development. This should include:

- Footway and carriageway dimensions;
- Parking bay dimensions;
- Cycle parking details (location, type, and capacity)
- Gradients of pedestrian routes and access points.
- Loading Bay and delivery details – i.e. are there dropped kerbs from the footway to the loading Bay, when would deliveries likely occur as this would affect visibility and usage of cycle parking/walking routes, is there consideration for how the loading Bay may limit visibility within vision splays from the existing crossover



This level of detail is necessary to ensure compliance with design standards and Active Travel Guidance.

5. Cycle Parking

5.1. The amount, type and spacing of cycle storage need to comply with the Active Travel Act Guidance, as shown below.

Based on the site plan it is assumed that there would be 4 Sheffield stands, but this would need to be clarified as site plan diagram is unclear. With the self-contained retail unit measuring 372sqm (as per Design and Access Statement provided) 4 stands would comply with ATAG for a medium-sized retail unit. Quantities and dimensions for the stands are outlines in the diagrams below.

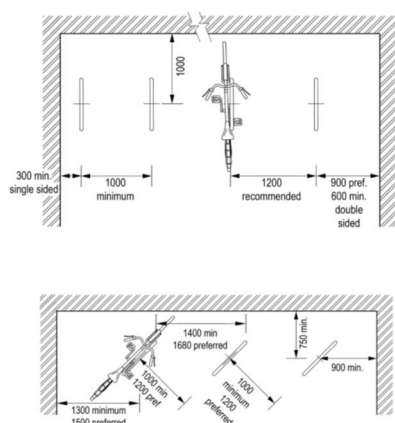
Table 14.4 – Cycle parking quantities for new development

Land use type	Sub category	Short stay requirement (obvious, easily accessed and close to destination)	Long stay requirement (secure and ideally covered)
All	Parking for adapted cycles for disabled people	1 space minimum. 10% (up to 50 spaces) 5% of total capacity (over 50 spaces) co-located with disabled car parking	1 space minimum. 10% (up to 50 spaces) 5% of total capacity (over 50 spaces) co-located with disabled car parking
Retail	Small (<200m ²) Medium (200-1,000m ²) >1,000m ²	1 per 100m ² 1 per 200m ² 1 per 250m ²	1 per 100m ² 1 per 200m ² 1 per 500m ²
Employment	Office/finance (A2/B1) Industrial/warehousing (B2/B8)	1 per 1000m ² 1 per 1000m ²	1 per 200m ² 1 per 500m ²
Leisure and institutions	Leisure centres, assembly halls, hospitals and Educational institutions	Greatest of 1 per 50m ² or 1 per 30 seats/capacity	1 per 5 employees Separate provision for staff and students. Based on travel plan mode share targets, minimum: Staff: 1 per 20 staff Students: 1 per 10 students
Residential	All except sheltered/elderly housing or nursing homes Sheltered/elderly housing/nursing homes	0.05 per residential unit	1 per bedroom 0.05 per bedroom
Public transport interchange	Standard stop Major interchange	Upon own merit 1 per 200 daily users	

Table 14.6 – Space required for cycle parking

Situation	Dimensions	Area per cycle
Stands on street	1.8m x 0.5m	1m ²
Within building – minimum	1.8m x 0.5m spaces plus 1.8m aisle	1.35m ²
Within building – desirable	2.0m x 0.75m spaces plus 3.0m aisle	2-3m ²

Figure 14.25 – Recommended layouts and dimensions for Sheffield stands – perpendicular and echelon



Notes to Planner

Standalone document of Proposed site plan should be requested to further evaluate whether the plans comply with Active Travel Act Guidance. Currently the one's embedded within the documents are unclear and too low resolution.

NPT Planning Policy

"As discussed earlier, with regard to retail planning policy and in particular LDP policy R3, my comments on this application are

1.Retail need: It is considered that the applicants have provided sufficient information to show that a quantitative need exists in the area for further convenience goods retailing, supplemented by additional qualitative justification to satisfy criterion1 of the policy.

2.Sequential test: two alternative edge of centre sites have been identified in GCG that could potentially accommodate the proposal and would be sequentially preferable. It is considered that insufficient information has been provided to show that the sites are not available or to demonstrate that either site (or the two sites combined) could not provide a viable and preferable location for the development."

NPT Environmental Health

"The General Environmental Health Planning Consultation response to the above application has considered the following relevant areas:

Noise	☒	Air Quality	☒	Contaminated Land	☒
Odour	☐	Housing	☐	Other (please specify)	☐

The Environmental Heath Team, in responding to the above application, provides the following substantive response:

No Objection	☐
No Objection subject to conditions (see the specified conditions below)	☐
Requires further information (see details below)	☒
Objection (on the grounds set out below)	☐
Discharge of planning conditions	☐
Discharge of planning conditions not recommended	☐

Overall Recommendation

We require additional information in relation to noise.

Observations and Comments

Noise

The application includes a plant area but we have not been provided with a noise impact assessment in accordance with BS4142 for the potential noise source. In our opinion this information should be provided prior to determination of the application to allow for conditions if necessary for mitigation and controls.

The application also states that deliveries will take place between 06.00 and 23.00 hours. Environmental Health would not be supportive of this, due to the proximity to residential receptors and would want to restrict deliveries and refuse collections to between 07.00 and 19.00 hours unless it can be demonstrated by way of a noise assessment that the extended hours would not have a detrimental impact on neighbouring residents.

Contaminated Land

As the application rightly highlights the development has the potential to have been affected by contamination from previous industrial uses in the area. We are in agreement that risk assessments and if necessary remediation can be secured by condition and would recommend the standard condition for this purpose.

Air Quality

As this is a small local store, we do not consider it likely that it will have a detrimental impact on air quality.

Recommended Conditions

Noise – further information is required but conditions in relation to noise levels from plant and restrictions on deliveries and refuse collections are likely.

Contaminated Land – LC01, 03, 04 and 05.
