

PLANNING STATEMENT

Land at Ysgol Gymraeg Ystalyfera

August 2020



Summary

Proposal:

Construction of 2G sports pitch with associated floodlighting (8no. 15m high mounted columns), and pitch enclosures and associated works

Location:

Land at Ysgol Gymraeg Ystalyfera, Glan Yr Afon, Ystalyfera, Swansea, SA9 2JJ

Date:

August 2020

Project Reference:

S20.118

Client:

Andrew Scott Ltd on behalf of Director of Education, Neath Port Talbot County Borough Council

Product of:

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Introduction

- 1.1 This Planning Statement accompanies a full planning application submitted on behalf of Andrew Scott Ltd on behalf of the Director of Education, Neath Port Talbot County Borough Council. The application comprises Construction of 2G sports pitch with associated floodlighting (8no. 15m high mounted columns), and pitch enclosures and associated works on Land at Ysgol Gymraeg Ystalyfera, Glan Yr Afon, Ystalyfera, Swansea, SA9 2JJ.
- 1.2 This will provide a facility that better serves the needs of a Twenty First Century School.
- 1.3 The planning application comprises the following set of drawings prepared by Lawray Architects:

Drawing name	Drawing reference
Site Location Plan	A-039102 P03
Proposed Site Plan	A-069100 P00
Proposed 2G Sports Pitch	A0900100 P00
Proposed External Lighting	1920-012 SKE02
Proposed Drainage	(50)050 P01

- 1.4 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application forms (1APP)	Asbri Planning
Planning Statement	Asbri Planning
Noise Report	Acoustic Consultants Ltd
Phase 1 Preliminary Ecological Appraisal & Bat Surveys	Soltys Brewster
Pitch Lighting Calculation	SABA Consult

- 1.5 The statement takes the format of providing background information at section 2, an overview of the site and its surroundings at section 3 including a review of the relevant planning history. Section 4 will provide a description of the proposal with section 5 giving a summary of each of the application documents. Section 6 will then identify the relevant planning policy to the proposal and section 7 will provide an appraisal of the scheme against the planning policy. Finally, section 8 will conclude the document.

Background

Neath Port Talbot County Borough Council - 21st Century Schools Programme

- 2.1 The 21st Century Schools and Education Programme is a unique collaboration between the Welsh Government (WG), the Welsh Local Government Association (WLGA) and the local authorities in Wales, including Neath Port Talbot County Council. It is a major, long-term and strategic capital investment programme with the aim of creating a generation of 21st century schools in Wales. The programme will focus resources on the right schools in the right places, for early years through to post-16. The programme is partly funded by Welsh Government using a combination of capital and revenue funding, with the remaining funding provided by local authorities and others.
- 2.2 The primary aims of the programme are to:
- Reduce numbers of poor condition school buildings
 - Reduce surplus capacity and reduce running costs so as to maximise resources available to target improvements to learner outcomes.
 - The programme is also able to include proposals that address specific demand for places in Welsh Medium and Faith Based provision.
- 2.3 In 2008 Neath Port Talbot County Borough Council confirmed its commitment to modernising educational provision across the Borough. Through its own Strategic School Improvement Programme more than £123m has been invested in Neath Port Talbot's Educational facilities.
- 2.4 To date a number of schools have benefited from the 21st Century School Programme and Neath's Strategic School Improvement Programme. These include:
- Awel Y Mor – a £7.9m primary school in Sandfields in Port Talbot
 - Ysgol Bae Baglan - The award winning £40m all-through school Baglan, Port Talbot
 - Ysgol Gymraeg Ystalyfera – A £16m investment in the YGY Campus in the Swansea Valley
 - Ysgol Cwm Bromptil – A New £30m all-through school
 - The £19.3m Ysgol Gymraeg Bro Dur in Sandfields
 - The £7m Ysgol Carreg Hir in Briton Ferry

- 2.5 Since the initial funding Neath Port Talbot Council has been developing the next phase of schemes for the Strategic School Improvement Programme. The Welsh Government as part of the 21st Century School Programme has confirmed funding for £67m worth of investment to further the aims of modernising education in the Borough of Neath Port Talbot through the future Band B projects.

Site description

General location

- 3.1 The site is land located within Ystalyfera which is a former industrial village and community in the upper Swansea Valley, on the River Tawe, approximately 13 miles northeast of Swansea. The site is land within the existing Ystalyfera School ground and which forms part of the schools wider playing field space.

The site

- 3.2 The site is detached from the wider school grounds that occupy all of the building and is located to the east of the Afon Twrch on a parcel of land which is currently occupied by playing fields. The existing MUGA on site currently forms a compound which was used during the construction of previous phases of development at the school. The site is accessed via a single width lane known as 'Glantwrch' which also serves a property known as 'Abertwrch Farm' which is to the south east. Further to the east is an existing sewerage treatment works which has its own dedicated access.
- 3.3 The TAN:15 development advice maps produced by NRW identify the site is largely located within flood zone B areas known to have flooded in the past, albeit part of the access to the site is over zone C2 whereby appropriate consideration needs to be made.
- 3.4 The historic wales maps identify there are no listed buildings or scheduled ancient monuments within the site boundary or within close proximity to the site.
- 3.5 A review of the Coal Authority development advice maps identifies the site is wholly located within a coal mining reporting area.

Surroundings

- 3.6 The surrounding area is predominantly comprised of residential use with complementary uses including:
- Open space/playing fields;
 - Ystalyfera RFC;
 - Places of Worship;
 - Community Hall;
 - Pharmacy;
 - GP;
 - Supermarket
 - Public House; and
 - Convenience shop

- 3.7 The school grounds are comprised of a mix of modern and older school buildings following partial redevelopment alongside ancillary facilities such as a car park and recreational areas.

Access

- 3.8 Access to the site is via a single width lane known as Glantwrch which itself is accessed off Gurnos Road. A footbridge provided a pedestrian link between the school grounds and the playing field site.

Planning History

- 3.9 The wider school site has a range of planning history as this is phase 3 of the redevelopment. This includes:

Application no.	Description	Decision
P2014/0294	Siting of 1 No. demountable building, construction of access track and perimeter fencing for use as a classroom for a temporary period not exceeding 24 months	Approved (28 th May 2014)
P2014/0788	Siting of demountable buildings for use as classrooms, staffrooms and toilets for a temporary period not exceeding 24 months. (Phase 1 of which was approved under P2014/0294)	Approved (9 th December 2014)
P2014/1175	Demolition of existing 2/3 storey teaching block and construction of new 2/3 storey teaching block	Approved (5 th February 2015)
P2016/1090	Construction of a 2 storey school building (for pupils age 3-11) together with associated parking, playground facilities, lighting and landscaping, plus highway works	Approved (31 st January 2017)
P2018/0444	Retention and completion of works to facilitate the creation of additional car parking and enclosure within school grounds	Approved (27 th June 2018)

P2019/5175	Retention of existing temporary contractors site accommodation to March 2022	Approved (19 th August 2019)
P2019/0419	Prior Notification for the demolition of the 3 no blocks, Tawe, Maths and Swimming Pool/Gymnasium	Prior Notification Not Required
P2020/0425	Construction of two storey school classroom building and associated works	Approved (7 th July 2020)

Proposals

- 4.1 The proposal comprises the construction of a floodlit 2G artificial surface playing field with associated enclosures. The overall pitch dimensions are 97.4 x 63m. The enclosure is a 4.5m high fence surrounding the perimeter of the pitch. 8 no. floodlights are proposed mounted on columns to a height of 15m.
- 4.2 Areas of ancillary hard surfaces and footpaths are also included and generally making good of surfaces and boundaries in the vicinity.
- 4.3 Having taken advice from the Council's Ecologist the floodlit pitch is proposed away from boundary hedgerows. The proposed external lighting plan demonstrates the light spread. Bat Activity Surveys have also informed the proposals.

Supporting documents

- 5.1 The following section intends to provide a brief overview of the supporting documents and reports which have been prepared to accompany the planning application for the proposed development.

Ecology

- 5.2 An ecological appraisal of the site has been undertaken by Soltys Brewster Ecology this includes a summary of bat survey results. Desk based consultation confirmed that the site itself does not hold any form of statutory or non-statutory nature conservation designation. The Ecological Appraisal undertaken in March 2020 identified that the site was dominated by amenity grassland and hard standing with some small areas introduced planted shrubs and scattered scrub. Generally the amenity field is considered of limited ecological interest and represents the most suitable area of the site to support development. The main potential constraint identified pertained to bats, where commuting links and areas of foraging opportunities for bats could be affected by additional light spill (from pitch floodlights) illuminating bordering vegetation of woodland to the east and riparian corridor to the west.
- 5.3 In general, the level of bat activity was considered to be between low/moderate across the site, with relatively small numbers of bat passes recorded during the transect activity surveys. A limited range of bat species were recorded during the surveys with passes recorded only for Common Pipistrelle and Soprano Pipistrelle. The highest level of bat activity recorded/observed was during the first activity transect conducted in April 2020.

Noise Impact Assessment

- 5.4 A Noise Impact Assessment has been undertaken by Acoustic Consultants Ltd. This report addresses the noise impact of the sports pitch on the existing sensitive receivers around the site and provides outline mitigation measures as appropriate. The report concludes that the proposals are considered acceptable in terms of noise impact on existing properties and the impact is low in terms of the relevant guidance documents and Planning Policy Wales.

Planning policy context

Introduction

- 6.1 The planning policy framework for the determination of this application is provided by the content and scope of national planning guidance, together with the Neath Port Talbot Local Development Plan (LDP) adopted January 2016.

Planning Policy Wales

- 6.2 PPW Edition 10 was adopted by the Welsh Government in December 2018 and is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications. PPW Edition 10 sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.
- 6.3 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. PPW and the National Development Framework (NDF) set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).
- 6.4 Sustainable development is defined as:
- “Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. ”***
- 6.5 Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Plans at all levels of the development plan hierarchy must be prepared in accordance with national planning policies. Planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.

6.6 **Under Section 2 – People and Places – Achieving Well Being Through Placemaking**, 5 Key Planning Principles are highlighted, under the general heading of ***Achieving the Right Development in the Right Place*** which are:

- 1. Growing our economy in a sustainable manner***
- 2. Making best use of resources***
- 3. Facilitating Accessible and Healthy Environments***
- 4. Creating and Sustaining Communities***
- 5. Maximising environmental protection and limiting environmental impact.***

6.7 **Section 3 – Strategic and Spatial Choices** states that effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals.

6.8 Paragraph 3.3 emphasises that good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.

6.9 Section 3.8 relates to how good design can help to ensure high environmental quality. Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places

6.10 Community safety is a key social consideration with the aim to produce safe environments that do not compromise on design quality in accordance with the cohesive communities well-being goal.

6.11 Avoiding car based developments is key to achieving good design as it contributes to minimising the need to travel with reliance on the car. Achieving these objectives can be made easily accessible by sustainable transport modes.

6.12 Section 3.13 relates to existing infrastructure stating:

“Existing infrastructure must be utilised and maximised, wherever possible. Where new infrastructure is necessary to mitigate transport impacts of a development and to maximise accessibility by sustainable non-car modes, it should be integrated within the development layout and beyond the

boundary, as appropriate. This could include works to connect cycle routes within a site to a wider strategic cycling network or provision of bus priority measures on highway corridors serving a new development."

- 6.13 **Section 4 – Active and Social Places** defines those places which promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities. Places which are active and social contribute to the seven goals of the Well-being of Future Generations Act. The key issues in this theme include:
- *assisting in the delivery of cohesive communities which will meet the needs and are accessible to all members of society, including older people;*
 - *tackling inequalities between communities, delivering services and jobs closer to where people live and acknowledging the importance of inclusive communities and the wider environment for good health and well-being;*
 - *improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles*
- 6.14 Paragraph 4.19 states that the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:
- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car
 - are designed in a way which integrates them with existing land uses and neighbourhoods; and
 - make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.
- 6.15 **Section 6 – Distinctive and Natural Places** requires that development plan strategies, policies and development proposals should be formulated to look to the long term protection and enhancement of the special characteristics and intrinsic qualities of places, be these of natural, historic or built environments, ensuring their longevity in the face of change. This means both protecting and enhancing landscapes, habitats, biodiversity, geodiversity and the historic environment in their own right as well as other components of the natural world, such as water resources or air quality.
- Technical Advice Notes**
- 6.16 The following TANs are considered relevant to this planning application:

Technical Advice Note (TAN): 5 Nature Conversation and Planning

- 6.17 TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

Technical Advice Note (TAN) 12: Design (2016)

- 6.18 TAN 12 provides guidance on how good design should be achieved through the planning process. The document recognises that design is a process of analysis of the surrounding area recognising and resolving any issues that may be present.

Technical Advice Note (TAN) 18: Transport (2007)

- 6.19 TAN 18 explains how to integrate land use and transport planning with particular emphasis on how transport impacts should be assessed and mitigated through well designed developments.

Neath Port Talbot Local Development Plan

- 6.20 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decision should be made in accordance with the authority's adopted development plan, unless material considerations indicate otherwise. In this instance, the statutory development plan for this application site is provided in the Neath Port Talbot Local Development Plan (2010-2021).
- 6.21 The site is located outside of the settlement boundary for Ystalyfera, within a mineral safeguarding area and is within the settlement protection zone.
- 6.22 The following LDP policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
<i>Overarching Policies</i>	
SP1	Climate Change
SP2	Health
SP3	Sustainable Communities
SC1	Settlement Limits
SC2	Protection of Existing Community Facilities
SP4	Infrastructure
<i>Topic Based Policies</i>	
SP10	Open Spaces
OS2	Protection of Existing Open Space
<i>Environment and Resources</i>	
SP15	Biodiversity and Geodiversity
EN6	Important Biodiversity and Geodiversity Sites

EN7	Important Natural Features
SP16	Environmental Protection
EN8	Pollution and Land Stability
SP17	Minerals
M1	Development in Mineral Safeguarding Areas
M2	Surface Coal Operations
M3	Development in Mineral Buffer Zones
SP18	Renewable and Low Carbon Energy
SP19	Waste Management
<i>Transport and Access</i>	
SP20	Transport Network
TR2	Design and Access of New Development
<i>Culture and Heritage</i>	
BE1	Design

6.23 Policy OS2 is considered pertinent to the proposal and states:

"Protection of Existing Open Space Any proposals which would result in the loss of an existing area of open space will only be permitted where it can be demonstrated that:

- 1. The open space is no longer needed; and*
- 2. There is no shortfall of provision of that category of open space in the ward, before or as a result of the development; and*
- 3. The site would not be suitable to provide an alternative type of open space for which there is a shortfall.*

Or:

It can be demonstrated that equivalent or enhanced facilities can be provided on a suitable and accessible replacement site which would serve the local community equally well."

Supplementary Planning Guidance

6.24 The following supplementary planning guidance's are also of relevance to the proposed development:

- Parking Standards (October 2016);
- Biodiversity and Geodiversity (May 2018)
- Pollution SPG (October 2016);
- Open Space and Greenspace (July 2017);

Parking Standards (October 2016)

6.25 This Supplementary Planning Guidance (SPG) provides information about the standards that will need to be achieved in respect of parking provision across Neath Port Talbot setting out the relevant matters that will need to be taken into consideration when developments are being planned. It also provides guidance on the submission of travel plans and sustainability considerations that will

inform developers, designers and builders what is expected of them, and from them, at an early stage of the development process.

Biodiversity and Geodiversity (May 2018)

- 6.26 This Supplementary Planning Guidance (SPG) provides information and guidance setting out the expectations on all development proposals to protect, conserve, enhance and manage important habitats, species and sites of geological interest.

Pollution (October 2016)

- 6.27 This Supplementary Planning Guidance (SPG) gives information about pollution issues in Neath Port Talbot and sets out the relevant matters that will need to be taken into consideration when developments are being planned in the County Borough. This includes air, noise, light, land and water pollution.

Open Space and Greenspace (July 2017)

- 6.28 This Supplementary Planning Guidance (SPG) provides information in respect of open space provision. The provision of open space gives the opportunity for more active lifestyles and can therefore play an integral role in improving the health and well-being of residents.

Appraisal

Overview

- 7.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- The **principle of development at this location**
- The impact of the development on the **character and appearance of the surrounding area;**
- The impact of the development on **residential amenity;**
- The impact of the development on **biodiversity;**
- The impact of the development in terms of **drainage and flood risk;**
- Any **other material considerations**

The principle of development at this location

- 7.2 In relation to the principle of development the site is existing playing field land and therefore there is no change of use proposed. The only change is to the nature of surface proposed together with the introduction of floodlighting and fencing. Policy OS2 relates to the protection of open space and states that the loss of an existing area of open space will only be permitted where it can be demonstrated that that equivalent or enhanced facilities can be provided on a suitable and accessible replacement site which would serve the local community equally well. The proposal will provide enhanced facilities on the same site which will better serve the local community. The artificial pitches will be able to be used all year round. The proposal is therefore compliant with policy OS2 and the principle of development is considered to be accepted.

The impact of the development on the character and appearance of the surrounding area

- 7.3 As discussed above, the current use of the site is playing field and given the relatively well screened nature of the site it is not considered that the changes to the surfaces would have any adverse visual impact on the character of the area. The floodlighting proposed around the 2G sports pitch is likely to be the most imposing however, given the built-up setting and relatively screened nature of the site and the fact it is an existing playing field the floodlighting would not appear out of context.
- 7.4 The proposal is therefore compliant with PPW10, Technical Advice Note 12 (Design) and Policies SP3 (Sustainable Communities), SC1 (Settlement Limits), OS2 (Protection of Existing Open Space), EN3

(Green Wedge), SP4 (Infrastructure) and BE1 (Design) of the Council's LDP.

The impact of the development on residential amenity

- 7.5 The site is detached from the main school campus and largely away from the vast majority of existing residential properties to the north and west. Glantwrch Farm is the nearest residential receptor to the south east and a very conscious attempt was made to site the new 2G sport pitch away from this property such that the impact of the proposed floodlights would be minimised. A degree of noise and disturbance would be experienced by the existing occupier however this is not unusual given the pre-existing character of the site as a playing field.
- 7.6 The Noise Impact Assessment demonstrates that the proposal is acceptable in terms of noise impact on existing properties and the impact is low in terms of the relevant guidance documents and Planning Policy Wales. Whilst the external lighting plan provides pitch lighting calculation demonstrating that the flood lighting is predominantly captured within the pitch area. As such with appropriate management it is considered that the impact from noise, disturbance and lighting can be adequately mitigated such that no significant harmful residential impacts would be experienced.
- 7.7 Therefore the proposal is considered to maintain the amenity of adjacent residential dwellings. The proposal is therefore compliant with PPW10, Technical Advice Note 12 and Policies SP3 (Sustainable Communities), SC1 (Settlement Limits), SP4 (Infrastructure) and BE1 (Design) of the Council's LDP.

The impact of the development on biodiversity

- 7.8 The site as existing is comprised of playing fields and is currently being used as a compound area for the development of the Ystalyfera School buildings. The site itself is therefore considered to have low ecological value as is grassed playing fields that are regularly maintained.
- 7.9 The main ecological impact from the proposal relates to the installation of flood lighting for the 2G pitch. The report identifies the integrity of linear features beyond the site boundary should be carefully considered during the proposed works. In particular for mobile species such as birds and bats which are likely to utilise these features for foraging and commuting purposes.
- 7.10 No trees within the site will be felled/removed by the proposed development. As such all identified features albeit mainly low potential will be retained. However, there was still some risk

associated with light spill. The orientation of the pitch reduces the risk of light spill onto the woodland edge. The lighting as shown on the proposed lighting plan has been designed to reduce spillage in line with comments provided by the ecologist. The report concludes that the overall approach adopted is unlikely to have a significant adverse impact on foraging bats.

- 7.11 The proposal therefore presents no detrimental impact towards site biodiversity and is compliant with national and local planning policy.

The impact of the development in terms of drainage and flood risk

- 7.12 The site is located within flood zone B areas known to have been flooded in the past and used to indicate that as part of a precautionary approach site levels should be checked against the extreme flood level. The proposal is comprised of a low risk development. Overall, the development is at a low risk of flooding from all sources and meets the requirements of TAN:15.
- 7.13 In relation to surface water the proposal will have a negligible impact as will discharge from the site similarly to the existing conditions whereby surface water discharges to the ground.

Other materials considerations

Highways and Access

- 7.14 The proposal does not comprise any parking or vehicular access arrangements as it will utilise the schools existing facilities.

Drainage

- 7.15 A proposed drainage strategy has been prepared by Bingham Hall which shows the proposed 2G pitch will be permeable sand based carpet style surface. As the surface will be permeable the existing site conditions for surface water drainage will remain similar to the proposed.

Conclusion

- 8.1 This Planning Statement accompanies a planning application submitted on behalf of Andrew Scott Ltd on behalf of Director of Education, Neath Port Talbot County Borough Council. The application comprises the Construction of 2G sports pitch with associated floodlighting (8no. 15m high mounted columns), and pitch enclosures and associated works on Land at Ysgol Gymraeg Ystalyfera, Glan Yr Afon, Ystalyfera, Swansea, SA9 2JJ.
- 8.2 The application site comprises land within the existing Ysgol Gymraeg Ystalyfera school grounds. The development has arisen as part of the 21st Century Schools and Education Programme is a unique collaboration between the Welsh Government (WG), the Welsh Local Government Association (WLGA) and the local authorities in Wales, including Neath Port Talbot County Council.
- 8.3 The existing school is in operation with parts of the grounds being redeveloped under earlier phases. The project will help to bring the school into the requirements of the 21st century for students.
- 8.4 It is therefore considered that the proposal is compliant with the relevant policies highlighted and as such accords with relevant national and local planning policy and guidance. It is therefore requested that Neath Port Talbot County Borough Council's Local Planning Authority grant planning permission accordingly.