

PLANNING STATEMENT

Land at Leiros Park, Bryncoch, Neath

November 2020



Summary

Proposal:

Full planning application for the development of 200 residential dwellings and associated works

Location:

Leiros Park, Neath

Date:

November 2020

Project Reference:

S20.174

Client:

Hale homes

Product of:

Asbri Planning Limited
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Disclaimer:

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Introduction

- 1.1 This Planning Statement has been prepared on behalf of Hale homes to accompany a full planning application for the development of 200 dwellings and associated works at Leiros Park, Neath.
- 1.2 The site is allocated for housing within the adopted Neath Port Talbot Local Development Plan. As such, the site was fully assessed through the council's Candidate Site Assessment process and met the required criteria as summarised by the local authority as follows:
- 'This site has the potential to provide 200 homes in Bryncoch, a popular residential area well located in relation to Neath and the wide range of services and facilities on offer. The development of the site accords with the Strategy as Bryncoch is identified as a 'large local centre' in the settlement hierarchy. The site will make an important contribution to meeting the housing need of the County Borough. The allocation has taken account of the need to minimise the impact on the landscape, highway network and existing habitat and species. It is proposed to allocate the revised 12.2ha site for 200 residential units reference H1/2'.***
- 1.3 The purpose of this Planning Statement is to provide a clear and logical document to outline the planning considerations and planning policies relevant to the proposal. The document also acts as a method of demonstrating the details of the planning application in a way that can be read both by the professionals and the public.
- 1.3 This Planning Statement acts as a supporting document for the accompanying planning application and should be read in conjunction with all other elements of the application which include the following plans (prepared by Hammond Architectural) and supporting documents.

Drawing name	Drawing reference
Site Location Plan	LP-01
External Works Layout	EW-01 Rev A
Finishes Layout	FL-01 Rev A
Planning Application Layout	PL-01 Rev. C
Public Open Space Layout	POS-01 Rev. A
Proposed Street Scene	PST-01
Proposed Site Sections	PSS-01
1 bed affordable walkup flat	A1BF
2 bed house	A2B
2 bed affordable walkup flat	A2BF
2 bed bungalow	A2BU

3 bed house	A3B
car parking layout	CPL-01 Rev A
1800 close board	EN01
1800 brick screen wall	EN02
0480 timber knee rail	EN03
close board fence gate	EN04
existing site sections	ESS-01
garages	GD-01
garages	GD-02
6 bed split level house	HT1
5 bed split level house	HT2
4 bed split level house	HT3
4 bed split level house	HT4
4 bed split level house	HT5
5 bed house	HTA
4 bed house	HTB
4 bed house	HTC
3 bed house	HTD
3 bed house	THE
3 bed house	HTF
3 bed house	HTG
3 bed house	HTH
Retaining Walls	C004
Proposed Levels	C005
Highway Longsections 1 of 2	C006
Highway Longsections 2 of 2	C007
Vehicle Tracking Analysis	C009
Existing Site Plan	SAB02
Proposed Drainage Strategy	SAB03

1.4 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application forms	Asbri Planning
Design and Access Statement	Asbri Planning
Planning Statement	Asbri Planning
PAC Report	Asbri Planning
Archaeological Desk-Based Assessment	Archaeology Wales
Preliminary Ecological Assessment	Bay Ecology
Bat Survey Report (See Appendix of Updated PEA)	Phlorum
Reptile Presence Absence Survey (See Appendix of Updated PEA)	Hawkeswood Ecology
Preliminary Ecological Assessment (See Appendix of Updated PEA)	Hawkeswood Ecology

Transport Assessment	Asbri Transport
Travel Plan	Asbri Transport
Arboricultural Report	ArbTs – Arboricultural Technician Services
Landscape Character and Visual Impact Assessment	TDA
Coal Mining Risk Assessment (April 2017)	Terrafirma
Site Investigation (June 2017)	Terrafirma
Intrusive Coal Mining Risk Assessment (August 2017)	Terrafirma
Intrusive Coal Mining Risk Assessment (September 2020)	Terrafirma
Human Health Risk Assessment (September 2020)	Terrafirma
Geotechnical Appraisal (August 2020)	Quantum Geotech
Environmental Plan	Hale

- 1.5 In terms of content, this introductory chapter is followed by a brief description of the site and its features. Following this, Chapter 3 provides an overview of proposals. Chapter 4 comprises a summary of the application's supporting documentation. Relevant national and local level policy for the application's appraisal are explored within Chapter 5. The application is appraised in Section 6, with Chapter 7 drawing the statement to a conclusion.

Site description

- 2.1 This section sets out the site's general location and provides a brief description of the application site and its immediate surroundings.
- 2.2 The site lies some 1.5km directly north of Neath town centre and some 300 metres to the east of the A474 Penywern Road, which links Neath with Pontardawe. Built development extends for over 2 kilometres along this road, which forms the Bryncoch area of the town. The area immediately south of the application site is known as Rhydding. To the east, along the A4230, the settlement is known as Cadoxton.
- 2.3 The site lies within a predominantly residential land use context. Much of Leiros Park Road comprises of detached houses and bungalows constructed during the 1970s/1980s. Further west, along Alexander Road, dwelling types are mainly semi-detached and linked properties. Further west, along Gilfach Road, properties date from the inter-war period, and include larger, detached houses set in generous plots. Traditional terraced properties lie in the Cadoxton area below a wooded embankment.
- 2.4 Access to the site is obtained via Leiros Park Drive. It will form one of the two proposed vehicular access points to and from the development. It is currently used as an access road to six cul-de-sacs of residential housing which access it via individual priority junctions that differ in size. Parking is permitted along the length of the road with footways for pedestrian movement and street lighting present. The road provides access to Penywern Road.
- 2.5 The application site comprises several enclosed greenfield parcels on a south-facing slope, and measures approximately 11.89 hectares in area. Existing woodland and hedgerows define the separate field parcels. Furthermore, the site includes a former farmyard which is partially used as allotments, agricultural fields, hedgerow and areas of semi-improved grassland, scrub and woodland and an old stone barn.
- 2.6 Field boundaries are unmanaged and consist of mature trees and shrubs. To the north of the site is farmland and Gilfach Quarry, to the west is Leiros Farm and Gilfach Road – a lane that runs north-south providing access to Gilfach Quarry. Leiros Parc Drive and Daphne Road adjoin the site's southern boundary which also provide two access points to the development. To the east is dense woodland covering a steep topography, beyond that is Cwmbach Road and further housing.

Proposals

- 3.1 This statement should be read in conjunction with the accompanying Design & Access Statement which includes a response to the 5 Objectives of Good Design (*Access; Character; Community Safety; Environmental Sustainability; & Movement*) in accordance with the guidance set out in Technical Advice Note (TAN) 12: Design.
- 3.2 The application seeks planning permission for a housing scheme comprising the construction of 200 no. residential units with associated access and landscaping works. In producing the preliminary design and layout of the proposed development regard has been paid to the site's position within an established urban area which is surrounded by residential development.
- 3.3 The development will comprise a mix of open market housing and purely affordable housing split between 180 private and 20 affordable dwellings provided and organised in the following schedule of accommodation:
- 11 no. 6 bedroom houses;
 - 26 no. 5 bedroom houses;
 - 67 no. 4 bedroom houses;
 - 62 no. 3 bedroom houses;
 - 28 no. 2 bedroom houses, bungalows & apartments; and
 - 6 no. 1 bed apartment.
- 3.4 It is proposed to retain important trees and hedgerows within the site to ensure green corridors and landscape interest. It is also proposed to retain the route of the existing public rights of way and the route of the historic Rhyddings Canal is respected with suitable buffers.
- 3.5 Proposed materials sensitively correspond with the existing built context and comprise of the following:
- Concrete roof tiles;
 - Brick;
 - UPVC windows and rainwater goods;
 - Render; and
 - Stone cills and heads.
- 3.5 The proposals will incorporate areas of public open space as an integral part of the development, including both formal and informal recreation space. A dedicated kick-about area is proposed to the east of the site, to the immediate north of plot 46.

- 3.6 The site has a steep topography so the development will incorporate split level dwellings where necessary in order to respond to the site constraints.
- 3.7 As part of the development it is proposed to provide two points of vehicular access; one access from Leiros Parc Drive, and the other from Daphne Road. These accesses will form an extension to both existing carriageways, connecting with the proposed development's internal layout. The proposed vehicular accesses will also provide the main point of access for pedestrians and cyclists with 2m wide footways along both sides of the access roads. There are existing footpath links routing through the site that are to be maintained, these are situated along the southern boundary of the site, routing north and east.
- 3.8 The development will provide the necessary pedestrian and cyclist infrastructure within the site to encourage residents to walk and cycle, with 2m wide footways included on one or both sides of the carriageway for its entire length and, where appropriate, shared use private drives also included, prioritising the needs of pedestrians and cyclists over that of vehicles.
- 3.9 Contained within the Landscape and Visual Impact Assessment as an appendix is an outline landscape strategy this shows:
- existing trees and vegetation to be retained and enhanced;
 - Existing footpath route within existing green corridor to be retained and enhanced with new native understorey & standard native trees;
 - Existing green corridor to be retained and enhanced with new native understorey & standard native trees;
 - Proposed public open space to include native hedgerow planting and standard native trees; and
 - Proposed on-plot ornamental / street tree planting

Supporting documents

- 4.1 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.

Design and Access Statement

- 4.2 The submitted DAS, prepared by Asbri Planning Ltd establishes that the scale, form, massing, layout and design are considered to be appropriate to the local setting. The DAS provide consideration of all design matters associated with the proposal in accordance with TAN:12 and design and access statement guidance produced by WG.

Transport Assessment

- 4.3 Asbri Transport Ltd have produced a Transport Assessment which includes an analysis of the local highway network, including provision for pedestrian, cyclist and public transport movement, and has concluded that there are opportunities for residents of the proposed development to undertake trips by alternative modes of travel to the private car and that the site is closely situated within close proximity to existing bus services and local amenities.

- 4.5 In conclusion, it is considered that this development proposed on an allocated site is appropriate and acceptable in traffic and transport terms. It is considered that the traffic movements associated with the development proposals could be accommodated on the highway network and will not have a significant detrimental impact on the conditions already experienced on the local highway network due to the existing volumes of traffic using the network and predicted growth in future traffic volumes.

Travel Plan

- 4.6 The primary focus of this Travel Plan is the travel undertaken by residents at the development but also includes measures to encourage sustainable travel by visitors to the development. The headline objective of this Travel Plan is to reduce the proportion of car trips to and from the site and fully encourage and facilitate travel by sustainable mode. This reduces the impact of the development on the local highway network.

Archaeological Desk-Based Assessment

- 4.7 In April 2016, Archaeology Wales carried out an Archaeological Desk-Based Assessment and site visit to determine the archaeological potential of the site. The assessment confirms that no Scheduled Ancient Monument, Listed Building, registered Historic Landscape,

Conservation Area or listed Historic Park & Garden will be directly affected by the proposed development.

- 4.8 The site will have a minor indirect (visual) impact on The Gnoll, a Grade II* listed parkland, due to the partial visibility of the proposed development from viewpoints within the parkland. The site will also have a negligible indirect (visual) impact on four Scheduled Ancient Monuments due to distant and restricted views of the proposed development. The site will also have a negligible indirect (visual) impact on six Listed Buildings, again due to distant and partial views of the proposed development. The site is also considered to have a negligible indirect (visual) impact on Neath Town Centre Conservation Area, due to views across the Conservation Area from within the proposed development area, and slight alterations to the urban setting of this area.
- 4.9 The site lies within the Landmap historic landscape areas of Bryncoch Cilybeyll (NPTHL040), Neath Port Talbot Urban Corridor (NPTHL054) and Dulais Valley SW (NPTHL074). The development will have a minor direct and indirect (visual) impacts on Bryncoch Cilybeyll by altering part of the enclosed farmland and introducing an urban element to this landscape. The development will have a negligible direct and indirect (visual) impacts on the remaining Landmap historic landscape areas as it will not impact on any significant characteristic elements of these landscapes. Research highlights eight sites of archaeological interest within the proposed development area, along with a general potential for later post-medieval industrial activity. The former Rhydding Farmstead is recorded both as post-medieval house and farmstead (PRN 2630w), and the potential site of a medieval monastic grange (PRN 5278w). Rhydding Canal (LPN01), an early 19th century canal associated with George Tennant, forms the southwestern boundary of the site, and a post-medieval gravel pit (LPN02), the site of a post-medieval barn (LPN03), a post-medieval tramway/trackway (LPN04), possible outlying features associated with a post-medieval farmstead and colliery (LPN05) and terraced platforms within the upper valley slope (LPN06), all lie within the bounds of the proposed development and may potentially be directly affected by development works.
- 4.10 It is recommended that a buffer zone be maintained around the site of Rhydding Canal (LPN01) to ensure preservation in situ. Recording work, such as a photographic survey, is recommended on any upstanding remains of Rhydding Farmstead (PRN 2630w) prior to development, and an archaeological watching brief is recommended for any groundworks within and around the site of the former farmstead to record any below-ground remains associated with the farmstead and potentially with any remains associated with the

medieval grange (PRN 5278w). A further archaeological watching brief on development works that affect the remaining archaeological sites is also considered to be appropriate mitigation to ensure their preservation through record. It is further recommended that the public rights of way be maintained with an appropriate buffer zone to ensure continued visibility from within the area, as recommended in the LDP Strategic Housing Site Assessment Report.

Ecological Impact Assessment (September 2020)

- 4.11 The Ecological Impact Assessment has been prepared by Bay Ecology to address the potential ecological effects of the proposed development. The report includes a summary of the current conditions found within the surveyed area, a valuation of the ecological features and an indication of impacts and mitigation associated with the construction and operation of the proposed residential development. The structure of the report and the assessment methodology is based on current best practice guidelines described by the Chartered Institute of Ecology & Environmental Management (CIEEM, 2018). The scope of the EclA was established in correspondence with Neath Port Talbot post review of Hawkeswood Ecology & Phlorum Limited Survey Report conducted between 2016 & 2018. This verified the scope of the surveys undertaken at the site in 2020, the results of which have been used to inform the assessment within this report. The historic ecology surveys and report have been appended to this updated ecological impact assessment and are summarised below.

Preliminary Ecological Assessment (July 2016)

- 4.12 The above assessment was carried out by Hawkeswood Ecology in July 2016 and has subsequently been superseded/updated by the ecological impact assessment prepared by bay ecology June 2020.

Reptile Presence/ Absence Survey (November 2016)

- 4.13 The reptile survey was prepared by Hawkeswood Ecology in November 2016 following a field survey in September 2016. The survey has subsequently been superseded/updated by the ecological impact assessment prepared by bay ecology June 2020.

Bat Survey Report (October 2016)

- 4.14 The Bat Survey was undertaken by Phlorum and has subsequently been superseded/updated by the ecological impact assessment prepared by bay ecology June 2020.

Arboricultural Report, including Tree Survey & Tree Constraints Plan

- 4.15 An Arboricultural Report has been prepared by ArbTS which includes a Tree Survey, Tree Constraints Plan, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement. The proposal will require the removal of 45 no. trees comprises 11 category B and 34 category C & U. The proposal also required the removal of 1 category A group of trees and 6 category C groups of trees and hedgerows. The removal of the trees can be readily mitigated for through suitable compensatory tree planting to ensure there is no adverse impact onto the tree amenity of the surrounding area. Adhering to the tree protection details as found within this report the proposed development can be constructed without any significant long-term adverse impact onto the retained trees or the amenity of the area.

Landscape Character and Visual Impact Assessment

- 4.16 TDA have undertaken a Landscape Character and Visual Impact Assessment of the site to assess the general visual and landscape character impacts the proposed residential development will have upon the surrounding landscape. Whilst any proposed residential development would change the character of the site itself, the site would represent a logical infilling of development and would therefore be in keeping with the wider landscape character of the area. Overall the report concludes that it is therefore considered that the site can accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape.

Pre-Application Consultation (PAC) Report

- 4.17 Following the proposal undergoing the statutory pre-application consultation a Pre-application Consultation Report has been produced by Asbri Planning and has been submitted in support of this application. The report summarises the responses received from Community, Specialist and Other consultees alongside responses to their representations.

Coal Mining Risk Assessment (April 2017)

- 4.18 Terra Firma (Wales) Limited undertaken a Mining Risk Assessment Report for the site. The main objectives of Mining Risk Assessment were to:
- Investigate any historic mining activities that may pose a risk to the proposed development.
 - Determine the geological conditions beneath the site.
 - Determine if shallow workings are likely to be present beneath the site.
 - Determine the likely amount of sound rock head cover above any workings.

- Provide an assessment of the risk from shallow workings beneath the site.

4.19 The report recommends that a site investigation comprising rotary probeholes should therefore be carried out to quantify the risk from past shallow workings. All suspected mine entries should also be found, and their position, depth and dimensions recorded.

Site Investigation (June 2017)

4.20 Terra Firma (Wales) Limited have undertaken a geoenvironmental assessment and geotechnical investigation of the site. The main objectives of the geoenvironmental assessment programme were to:

- Investigate the potential environmental liabilities at the site associated with any soil contamination
- Provide a summary of the environmental conditions at the site, together with any necessary further intrusive works and / or remediation works to render the site fit for its intended use

4.21 The main objectives of the geotechnical site investigation were to:

- Determine the type, strength and bearing characteristics of the shallow superficial and underlying solid geology
- Provide engineering foundation and floor slab recommendations for the development
- Provide recommendations with regard to any other geotechnical aspects pertaining to the development

4.22 The proposed remediation for the site comprises capping that is to consist of the proposed buildings, hard standing and in garden and landscaped areas 600mm of suitable clean imported subsoil/topsoil material.

Intrusive Coal Mining Risk Assessment (October 2017)

4.23 Terra Firma (Wales) Limited have undertaken an Intrusive Coal Mining Risk Assessment for the site. It was recommended that an exploratory investigation be undertaken at the site to investigate the risk to the site from shallow workings beneath the site, and to locate two shafts that were identified at the site by The Coal Authority. The Mountain coal seam was encountered it is recommended that further probeholes are sunk at the far north of the site to identify whether or not there are shallow workings associated with the Mountain coal seam.

4.24 At the unnamed coal seam it is considered that the risk to the site from shallow workings in the unnamed thin coal seam is negligible

and that no further risk assessment is warranted. At the Garland coal seam the risk to the site from shallow workings is negligible and no further assessment is warranted. No evidence of either shaft was encountered during the trial trenching. It is therefore considered that either the shafts do not exist, or they are located elsewhere on site.

Geotechnical Appraisal (August 2020)

- 4.25 Quantum Geotechnic Ltd (QG) have undertaken a series of in-situ Soakaway (percolation) tests within the agricultural land proposed for further residential development at Leiros Park, Bryncoch, Neath. The purpose of these tests was to obtain shallow ground information and drainage characteristics for the design of a suitable sustainable drainage solution across the proposed development site. Generally the strata described as silty Gravel and the underlying rock head provide a relatively high Soil Infiltration Rate which is anticipated will be sufficient to use within soakaway drainage, however the strata in localised areas was found to have significantly lower infiltration rates that is unlikely to support the use of such drainage solutions, i.e. in the areas of TP2, TP7, TP12 and TH13.

Human Health Risk Assessment (September 2020)

- 4.26 Terra Firma (Wales) Limited has therefore been commissioned by to determine a site-specific guideline for the site. It is anticipated that the site-specific guideline will provide a more reliable value with which to compare the site soils. Fourteen samples taken from the shallow natural soil were tested for a broad range of contaminants. Ten samples contained elevated concentrations of arsenic that exceeded the Category 4 Screening Level (C4SL) of 37mg/kg for a residential development with plant uptake. Across the fourteen samples, arsenic concentration ranged from 10mg/kg to 160mg/kg. No exceedances were recorded in any other samples and no visual or olfactory evidence of any other contamination was recorded in any of the exploratory holes.

Intrusive Coal Mining Risk Assessment (September 2020)

- 4.27 A Coal Mining Risk Assessment was previously undertaken at the site by Terra Firma (Report 14156 in June 2017). It was recommended that an exploratory investigation be undertaken at the site to investigate the risk to the site from shallow workings beneath the site, and to locate two shafts that were identified at the site by The Coal Authority. The Mountain coal seam was encountered in PH03, PH04, PH06, PH10, PH11, and PH13 to PH17 at the north of the site, varying between thicknesses of 0.3m and 2.1m. These probeholes confirm that the seam outcrops at the north of the site. No workings were recorded in the Mountain coal seam. It is therefore concluded that the seam is unlikely to be worked beneath the site and that the risk to the site from shallow workings in the seam is negligible.

4.28 The unnamed thin coal seam was recorded at depths of 15.2-15.6m and 18.2-18.3m in PH01 and PH02 respectively and in some of the other probeholes it was not recorded where it would have been expected, indicating that the seam is intermittent. It is therefore considered that the risk to the site from shallow workings in the unnamed thin coal seam is negligible and that no further risk assessment is warranted. The Garlant coal seam was not encountered in any of the three probeholes that were sunk at the west of the site to a depth of more than 29m below rockhead. The risk to the site from shallow workings in the Garlant seam is negligible and no further assessment is warranted.

Planning policy context

Introduction

- 5.1 The planning policy framework for the determination of this application is provided by the content and scope of national planning guidance, together with the adopted Neath Port Talbot LDP. National Planning Policy is largely contained within Planning Policy Wales (PPW) – 10th Edition, published by the Welsh Assembly Government on November 2019. PPW is supplemented by 21 Technical Advice Notes (TANs), the relevant TANs will also be discussed within this chapter.
- 5.2 The Development Plan for the purpose of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 is the Neath Port Talbot County Borough Council Local Development Plan which was adopted in January 2016. The adopted LDP provides the statutory framework for the development and use of land within the plan area during the Plan period (2011-2026).

Planning Policy Wales (PPW)

- 5.3 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.
- 5.4 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).
- 5.5 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. "

- 5.6 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.
- 5.7 The aforementioned Well-being of Future Generations Act is further explored in Section 1 of PPW, within which the 7 goals are further discussed. The goals are intended to shape the work of all public bodies in Wales and are listed as follows;
- A prosperous Wales;
 - A resilient Wales;
 - A healthier Wales;
 - A more equal Wales;
 - A Wales of cohesive communities;
 - A Wales of vibrant culture and thriving Welsh language; and
 - A globally responsible Wales
- 5.8 **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.***
- 5.9 Placemaking is a key thread running through the 10th Edition of PPW. It is described as an ***"inclusive process, involving all of those with a professional or persona interest in the built and natural environment, which focuses on developing plans, making decisions and delivering developments which contribute to the creation and enhancement of sustainable places."***
- 5.10 With reference to design, paragraph 3.5 states that ***"Good design is inclusive design"***. Furthermore, proposals are expected to ***"place people at the heart of the design process"***.

- 5.11 **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*
- 5.12 **Section 6 – Distinctive and Natural Places** – this theme covers environmental and cultural components of placemaking. Section 6.0.2 states:
- “The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These features give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles.”***
- 5.13 Section 6.3 of PPW10 relates to landscape recognising that all the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places.
- Technical Advice Notes**
- 5.14 Planning Policy Wales is supplemented by 21 topic-based Technical Advice Notes (TANs). The most relevant to this application are discussed, in turn, below.
- TAN 2: Planning and Affordable Housing***
- 5.15 Technical Advice Note 2 provides guidance on the planning system’s role within the delivery of affordable housing. Within the note, ***‘the need to work collaboratively is stressed, including the requirement for housing and planning authorities to undertake local housing market assessments in participation with key stakeholders’.***

TAN 12: Design

5.16 TAN 12 provides advice on design considerations and, in relation to the design of new housing development, paragraph 5.11.2 states that local planning policies and guidance should aim to:

- *create places with the needs of people in mind, which are distinctive and respect local character;*
- *promote layouts and design features which encourage community safety and accessibility;*
- *focus on the quality of places and living environments for pedestrians rather than the movement and parking of vehicles;*
- *avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building;*
- *promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards;*
- *secure the most efficient use of land including appropriate densities;*
- *consider and balance potential conflicts between these criteria.*

TAN 18: Transport

5.17 Published in March 2007, TAN 18 encourages the integration of land use planning and the development of transport infrastructure. This can be achieved by locating development where there is good access by public transport, walking and cycling. It advocates:

- **the integration of land use planning and transport in order to promote resource and travel efficient settlement patterns.**
- **ensuring that development is located where there is good accessibility by public transport, cycling and walking. This minimises the need to travel and promotes social inclusion,**
- **Managing parking provision. Paragraph 3.2 encourages local authorities to maximise relative accessibility. Accessibility is defined as the relative ability to take up services, markets or facilities. Placing focus on accessibility is important in addressing social exclusion and maximises the choices available in services, employment and recreation opportunities, in these instances, the TAN views transport as ‘a means to an end’.**

Neath Port Talbot County Borough Council Local Development Plan (2011-2026)

- 5.18 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions 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 (2011-2026) which was adopted by the council in January 2016.
- 5.19 Under Policy H1 of the LDP, the site is identified as a housing allocation for 200 dwellings under policy reference H1/2 (Leiros Park Extension).
- 5.20 The following LDP policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
<i>Strategic Policies</i>	
SP1	Climate Change
SP2	Health
SP3	Sustainable Communities
SP4	Infrastructure
SP5	Development in the Coastal Corridor Strategy Area
SP7	Housing Requirement
SP8	Affordable Housing
SP10	Open Space Provision
SP15	Biodiversity and Geodiversity
SP16	Environmental Protection
SP18	Renewable and Low Carbon Energy
SP19	Waste Management
SP20	Transport Network
SP21	Built Environment and Historic Heritage
<i>Area Based Policies</i>	
SC1	Settlement Limits
I1	Infrastructure Requirements
H1/2	Housing Sites
AH1	Affordable Housing
OS1	Open Space Provision
OS2	Protection of Open Space
EN6	Important Biodiversity and Geodiversity sites
EN7	Important Natural Features

EN8	Pollution and Land Stability
RE2	Renewable and Low Carbon Energy in New Development
W3	Waste Management in New Development
TR2	Design and Access of New Development
BE1	Design

- 5.21 The delivery of **'sustainable, healthy and cohesive communities and the conservation of the countryside'** is discussed by Strategic Policy SP3. The policy highlights how such communities will be promoted by:

**'1. Defining sustainable communities and locations for development by the identification of a settlement hierarchy that reflects the role and function of settlements;
2. Defining settlement limits within which development which accords with the settlement hierarchy will be permitted in principle;
3. Resisting inappropriate developments outside settlement limits'**

- 5.22 Within settlement limits, Policy SC 1 explains how a development 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'**.

- 5.23 Policy SP 7 sets out the authority's housing requirement during the Plan period. A total of 7,800 new dwellings are deemed necessary in order 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'**.

- 5.24 Policy H1 identifies the sites allocated for housing within the plan area. Relevant to this application is allocation H1/2 – Leiros Park Extension. In keeping with the number of units put forward within this application, the estimated number of units is states as 200 for the 12.2ha site.

- 5.25 Policy AH1 sets out the affordable housing requirement for new developments, including conversions, on sites accommodating 3 or more units. Within Neath, an affordable housing target of 25% is sought. However, exact levels of contribution **'will depend on the circumstances of each proposal and the viability of the scheme'**.

- 5.26 Relevant to this application is Policy SP10 which relates to Open Space. Adequate provision will be implemented through the following measures:

***'1. Ensuring that new development addresses local needs;
2. Retaining and protecting existing open space'***

- 5.27 Accompanying SP10, Policy OS 1 provides a table which outlines the following requirements and standards for different types of open space provision:

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

- 5.28 Policy W3 discusses the management of waste within new developments, certain proposals are required to produce Site Waste Management Plans, they are as follows:

***'a) Residential development for 50 or more dwellings;
b) Industrial or commercial development that would generate in excess of 1,000 tonnes of waste per annum;
c) Development that would generate hazardous waste'***

- 5.29 Policy SP20 discusses developments and the highway network, it states that transport systems and infrastructure should be delivered in a ***'safe, efficient and sustainable manner through the following measures:***

- 1. Implementing key transport projects and supporting schemes identified in the Joint Transport Plan;***
- 2. Promoting connectivity and access to public transport through improving bus and rail facilities;***
- 3. Supporting enhancements to the walking and cycling network;***
- 4. Promoting park and share schemes along key highway routes;***
- 5. Promoting efficient use and links to the transport network through the identification of a road hierarchy;***
- 6. Restricting development which would have an unacceptable impact on highway safety;***
- 7. Requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport;***
- 8. Requiring appropriate parking provision;***
- 9. Facilitating movement of freight by means other than road'***

- 5.30 With regards to the Design and Access of new developments, Policy TR2 explains how proposals will only be approved where all of the policy's criteria (where relevant) are met:

'1. The development does not compromise the safe, effective and efficient use of 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 allows 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'

Supplementary Planning Guidance

- 5.31 The below Supplementary Planning Guidance are considered to be of relevance to the proposal:
- Planning Obligations (October 2016)
 - Parking Standards (October 2016)
 - Affordable Housing (October 2016)
 - Biodiversity and Geodiversity (May 2018)
 - Pollution (October 2016)
 - Open Space & Greenspace (July 2017)
 - Renewable and Low Carbon Energy (July 2017)
 - Design (July 2017)
- 5.34 As a result of new private housing development, Paragraph 1.0.3 of the SPG on **Affordable Housing** states the provision of affordable housing is ***'seen as of paramount importance after the essential infrastructure (such as access and servicing) has been provided.'***
- 5.35 The SPG on **Open Space and Greenspace** highlights the requirement for open space provision on sites accommodating 3 or more units. The authority's preference for on-site provision is stated in Paragraph 4.1.3.3.
- 5.36 The SPG on **Design** ***'provides information in respect of design 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'***. It serves as supplementary guidance to LDP Policy BE1 (Design).

- 5.37 The document recognises that 'Design' refers to a wide range of factors such as the physical appearance of a building, ease of access, the impact of new development on existing structures as well as the protection of natural resources.

Appraisal

Overview

- 6.1 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**;
- The **impact** of development on the **character and appearance** of the **surrounding area**;
- The impact of the development on **residential amenity**;
- The impact of the development in terms of **access and the surrounding highway network**; and
- The **impact** of the development on **biodiversity**; and
- Other **material considerations**.

Principle of Development

- 6.2 The site is located within the settlement boundary in accordance with policy SC1. Development within settlement limits that is proportionate in scale and form to the role and function of the settlement is generally acceptable in principle. The site is allocated for housing under policy H1/2 for up to 200 dwellings. The proposal comprises residential development of 200 dwellings. As such the principle of residential development at the site is considered acceptable subject to detailed design considerations.

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

- 6.3 The proposals will serve as a continuation of Bryncoch's residential development which sits to the south of the site. The proposed development has been layout to mimic the orientation of the existing properties with dwellings fronting onto the highway and in cul de sacs. The proposal has much green infrastructure running throughout with existing trees being retained, open spaces and connecting corridors/pathways. The layout retains a significant band of trees and open space along the southern boundary which provides screening for the existing properties maintaining the green appearance. Overall it is considered that the proposal offers a logical continuation of residential development from the existing properties at Bryncoch developing the allocation site in keeping with the character and appearance of the built development.
- 6.4 The Landscape Character and Visual Impact Assessment considers the impact of the development on the character and appearance of its immediate setting with a focus on landscape. The development of

a greenfield site is going to change the character of the site itself but it is considered that this offers a logical infilling of development in keeping with the wider landscape character. The visual appraisal has established that, with the exception of Photo Viewpoints 3, 4, 8, 9 and 10 views of the site from the surrounding area and locations accessible to the general public are screened by a combination of the natural topography of the area, existing residential properties and existing trees & vegetation.

- 6.5 However, with regards to viewpoints 3, 4, 8 and 9 it should be noted that the viewpoints are immediately adjacent to the site boundaries, as such any visual impact is highly localised. Furthermore, as the surrounding residential properties are already clearly visible, glimpses of additional dwellings will not be out of context and the development will not be visually incongruous.
- 6.6 The Visual Impact report considers that based on the established landscape character of the area, the screening provided by a combination of the natural topography of the area, the surrounding residential properties & trees, the site could accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape.
- 6.7 The LDP identifies within the Valleys Strategy Area, a development density should be at least 30 dph. The site is approximately 12.2ha with 200 residential dwellings proposed. This equates to a gross density of 16.4dph. Considering the site constraints topography, existing trees, hedgerow, vegetation, requirement for providing open space, highways and incorporation of SuDS the developable area is significantly reduced. The net density of the site, site area minus site constraints, is therefore much closer to the required 30dph.
- 6.8 The proposal to develop the allocated site in accordance with the allocation provide a logical extension from the existing residential area of Bryncoch. The proposal has been sympathetically designed to allow assimilation into the existing character and appearance of the area which has been informed by a Landscape Character and Visual Impact Assessment. The proposal is therefore compliant with national and local planning policies.

The impact of the development on residential amenity

- 6.9 The layout has been designed and orientated to ensure there is no detrimental impact towards the privacy and amenity of existing and proposed residential dwellings. The main area of consideration for this matter is the south eastern corner of the site. The layout of the proposed properties ensures separation distances of 21m are

achieved between existing and proposed properties as demonstrated on the plan. Other sections of the southern boundary maintain and propose significant areas of trees which provides screening to and from existing properties. Overall the proposal maintains the privacy and does not create any overlooking to existing properties.

6.10 A second consideration in relation to amenity is the visual amenity that existing properties are afforded by the existing site. The existing site is undeveloped green land as such there is going to be a change in the visual amenity afforded to existing properties. The proposal offers landscape mitigation to lessen the impacts towards visual amenity. As set out in the Landscape Character and Visual Impact Assessment this includes:

- The integration of the development into the existing field pattern and the retention of all existing trees and hedgerows wherever possible.
- The enhancement of field boundaries with new native planting to soften the edges of the development and increase screening. Field boundary hedgerows will be maintained at an increased height of 1.8m.
- Detailed on plot landscape scheme and public open space provision to break up massing of the development and improve the biodiversity and landscape value of the site.
- Native and ornamental tree planting to provide biodiversity improvements and a strong arboricultural character.
- Retention of the existing footpath within a reinforced soft landscape buffer

6.11 With the proposed mitigation it is considered that the impact towards visual amenity will be acceptable.

6.12 The proposed dwellings achieve appropriate separation distances and does not create any areas of overlooking. Overall the proposal maintains the privacy and amenity of the existing residential dwellings and does not create issues within privacy and amenity within the proposed development. The proposal is therefore compliant with national and local planning policy.

The impact of the development in terms of access and the surrounding highway network

6.13 The proposal comprises two new access points via Leiros Parc Drive connecting centrally to the sites southern boundary and at Daphane Road to the sites south eastern corner. The points of access each extend from what are currently dead-ends. The two accesses enable a looped highway arrangement as detailed within the LDP. The points of access provide a logical extension to the existing highway layout.

- 6.14 The Transport Assessment considers the proposal impact surrounding highway. The application site is accessible to public transport, with the nearest bus stops located approximately 250m south of the application site's nearest boundary on Herons Way. Neath bus station is located within 1.7 km to the south of the application site. There are existing pedestrian routes providing safe access to the bus stops and station from the application site. Neath Railway station is located approximately 1.7km to the south of the application site.
- 6.15 There are several local cycle routes, both advisory and signposted, in proximity of the site that facilitate local connectivity as well as leading to national cycle route (NCN) 47. In addition, NCN 46 is currently being constructed, which will form a new long distance route connecting Neath to towns such as Brynmawr, Abergavenny and Hereford along its route when complete. It is therefore considered that there are realistic opportunities to utilise modes of transport other than the private car.
- 6.16 It is estimated that the proposed development could generate up to 121 vehicle movements (two-way) in the AM peak period and 100 vehicle movements (two-way) in the PM peak period.
- 6.17 Junction analysis has shown that the Penywern Road/A4230/Golwg y Gamlas/Cadoxton Road roundabout is already over capacity with current demand conditions. It is considered that the development will do little to degrade the roundabout's operational performance further. Significant junction analysis considering a number of improvements to Cadoxton Road has been undertaken which is proposed as a mitigation measure for the proposed development. This has concluded that the **Option 4B** improvement to Cadaxton Road would improve the operation of the junctions in the future assessment scenario of 2025 and 2035.
- 6.18 The average impact of the development traffic on all arms of the Penywern Road/A4230/Golwg Y Gamlas/Cadoxton Road roundabout is 2% in terms of the percentage change in traffic flow.
- 6.19 In conclusion, it is considered that this development proposed on an allocated site is appropriate and acceptable in traffic and transport terms. It is considered that the traffic movements associated with the development proposals could be accommodated on the highway network and will not have a significant detrimental impact on the conditions already experienced on the local highway network due to the existing volumes of traffic using the network and predicted growth in future traffic volumes.

The impact of the development on Biodiversity

- 6.20 The site has extensive trees and hedgerow throughout and the tree survey undertaken documents the existing site conditions. The arboricultural report highlights that the proposal will require removal of trees and hedgerow to accommodate the development. It is considered that the loss of trees and hedgerow can be readily mitigated for through suitable compensatory tree planting to ensure there is no adverse impact onto the tree amenity of the surrounding area. A tree protection plan has been produced to ensure that there will be no impact towards trees being retained during the construction phase. Adhering to the tree protection details as found within the arboricultural report the proposed development can be constructed without any significant long-term adverse impact onto the retained trees or the amenity of the area. Overall with the mitigation of additional tree planting proposed the development will have a negligible impact towards site arboriculture.
- 6.21 The site has had extensive ecological survey work with surveys undertaken in 2016 and updated surveys completed in 2020. The fieldwork was undertaken on 1st May 2020 by a suitably experienced ecologists and incorporated all the land within the proposed development site boundary and areas immediately adjacent to it (where access was possible). The land within the site boundary was comprised of habitats predominantly comprised of improved grassland fields, which are bordered by Ancient Semi Natural Woodland, broadleaf woodland treelines, bracken & bramble banks and unmanaged species poor defunct hedgerows; whilst a small heavily grazed poor semi-improved grassland field was located at the western extent of the site.
- 6.22 In relation to bats three dusk bat activity transects were considered sufficient to identify the levels activity and bat species utilising site. In total three dusk activity surveys were conducted between June and August 2020 during the optimal survey months (April-August inclusive), to ascertain the level of use of the site by bats; the bat species present and the resources the site provides e.g. commuting habitat/ foraging resource. In addition, automated detector surveys were also undertaken on the two hedgerows & single treeline, which separate the improved grassland fields, and are to be breached as part of the proposed development. A ground based inspection of the trees on site for their potential to support roosting bats was undertaken as part of the Extended Phase 1 Habitat survey conducted 1st May 2020. The development will result in the demolition of a stone barn located in the southern extent of the site, and as such an updated building inspection was conducted on the 1st May & 11th August 2020 with particular regard to roosting bats and nesting birds.

- 6.23 In general the bat activity was low/moderate across site, with relatively small numbers of bat passes recorded during the transect activity surveys, with the recorded calls considered to be produced by a small number of bat species. From the activity surveys the majority of the bat activity was associated with southern treeline, which extends along the boundary as well as the north eastern mature boundary woodland/treelines. Overall the site was considered to provide foraging and commuting habitat for a limited range of bat species dominated by 'hawking' species, those adapted for more open environments (e.g. Pipistrelle). Based on the low/moderate levels of activity and limited number of species recorded over the course of the surveys, the majority of the site (improved grassland fields) would be considered to have negligible ecological value for bats. However, the southern, eastern and north eastern extent of site, which possessed the more mature treelines and woodland habitats, had greater bat activity (foraging/commuting) associated with them. Given the increased activity in these areas the overall site was considered to be of local ecological importance to foraging bats.
- 6.24 In relation to birds a total of three breeding bird survey visits were completed; on the 1st May, 27th May and 17th June 2020. Survey visits commenced from dawn (this early start time was to record territorial singing passerines). The majority of the bird species identified onsite were scrub and tree habitat nesting birds, with no ground nesting birds identified during the targeted surveys. The assemblage of birds noted on the site were considered to be typical for the habitats present in this area of Wales and was considered to be of ecological importance in a Local context.
- 6.25 The Hawkeswood Ecology Preliminary Ecological Assessment concluded that further Dormice surveys were not required onsite as Dormice records within the area do not exist, and the lack of hedgerow network connectivity, combined with the Vincent Wildlife Trust (2001) predictive map did not predict their presence in this location.
- 6.26 Reptiles are considered likely to be absent from the majority of site. However, the presence of individual common reptile species could not be precluded. As such clearance and construction works across much of the site is unlikely to have a significant adverse impact on this species. However, clearance of areas considered potentially suitable to support small populations of common reptiles could result in injury or mortality of individuals present which is likely to constitute an adverse impact within the development site boundary in the absence of mitigation.

- 6.27 The EcIA 2020 concludes that a significant adverse impact was considered unlikely, on foraging bats, breeding birds, foraging badgers and reptiles, due to the retained and newly created habitats offsetting any initial habitat loss. A range of mitigation measures to avoid or minimise the impacts of the development during construction and operation have been incorporated into the scheme. Mitigation measures incorporated into the construction phase include the retention/ protection of as much woodland, treeline, grassland, scrub, ditches, running water and hedgerow habitat as practicable, avoidance of key periods (e.g. bird nesting season) during clearance works and production of a Construction Environmental Management Plan detailing measures to minimise the risk of run-off to existing watercourses. As part of the development new habitat features would be created as part of a public open space and would include new wildflower grassland and tree planting, along with the management and enhancement of retained habitats onsite.
- 6.28 A range of mitigation measures to avoid or minimise the impacts of the development during construction and operation have been incorporated into the scheme. Mitigation measures incorporated into the construction phase include the retention/ protection of as much woodland, treeline, grassland, scrub, ditches, running water and hedgerow habitat as practicable, avoidance of key periods (e.g. bird nesting season) during clearance works and production of a Construction Environmental Management Plan detailing measures to minimise the risk of run-off to existing watercourses. As part of the development new habitat features would be created as part of a public open space and would include new wildflower grassland and tree planting, along with the management and enhancement of retained habitats onsite.

Other materials considerations

Contamination

- 6.29 A range of site investigative works have been carried out for the site this includes:
- Coal Mining Risk Assessment – April 2017;
 - Site Investigation - June 2017;
 - Intrusive Coal Mining Risk Assessment - October 2017; and
 - Geotechnical Appraisal – August 2020
- 6.30 Remedial measures will be required with regards to site soils which have been found to contain elevated levels of arsenic. The affected soils are the shallow surface soils that cover the entire site. The proposed remediation for the site comprises capping that is to

consist of the proposed buildings, hard standing and in garden and landscaped areas 600mm of suitable clean imported subsoil/topsoil material.

- 6.31 In relation to coal The Mountain coal seam was encountered it is recommended that further probeholes are sunk at the far north of the site to identify whether or not there are shallow workings associated with the Mountain coal seam. At the unnamed coal seam it is considered that the risk to the site from shallow workings in the unnamed thin coal seam is negligible and that no further risk assessment is warranted. At the Garland coal seam the risk to the site from shallow workings is negligible and no further assessment is warranted. No evidence of either shaft was encountered during the trial trenching. It is therefore considered that either the shafts do not exist, or they are located elsewhere on site. As such further investigative works have been undertaken, see intrusive coal mining report September 2020. This concludes there is no risk.
- 6.32 Percolation testing identified that generally the strata is described as silty Gravel and the underlying rock head provide a relatively high Soil Infiltration Rate which is anticipated will be sufficient to use within soakaway drainage, however the strata in localised areas was found to have significantly lower infiltration rates that is unlikely to support the use of such drainage solutions, i.e. in the areas of TP2, TP7, TP12 and TH13.
- 6.33 Overall with the level of site investigation undertaken it is considered that contamination can be readily mitigated for.

Drainage Strategy

- 6.34 The proposed foul system is to gravitate into DCWW chambers and CCTV surveys will be required to confirm connecting to the chambers. In terms of surface water drainage infiltration testing has been undertaken which confirms that infiltration is a viable solution. The site is designed to infiltrate to ground and the majority of the highway runoff is designed to be collected by permeable paving, infiltration swales or basins. Where necessary a detention basin will be provided to deal with any overflow. At some sections of the highway a low infiltration rate was observed as such surface water will be collected within a piped system and discharged into the highway system at Daphne Road and Leiros Parc Drive. Permeable paving will be provided to maximise any infiltration.
- 6.35 Each plot is to include a water butt with an overflow discharging into the plots own private permeable paving / bio-retention areas discharging to the ground. Shared driveways are to be constructed from permeable paving discharging to ground.

- 6.36 The proposal has been design in accordance with national SuDS standards and a SAB application will be submitted.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Hale homes to accompany a full planning application for the development of 200 no. residential dwellings and associated works at Leiros Park, Bryncoch, Neath.
- 7.2 The site is a housing land allocation in the adopted Neath Port Talbot Local Development Plan with the planning application addressing the specific considerations highlighted during the site selection process, including landscape impact and transportation issues.
- 7.3 A suite of supporting documentation accompanies the planning application. The documents demonstrate the site's suitability for a residential development of this scale, a development which will form a major contribution to the authorities housing stock.
- 7.4 As such, it is concluded that the proposal fully accords with both national and local policies. Furthermore, there are no material considerations which would prevent the planning application from being determined in accordance with the relevant planning policy framework. In this respect, it is respectfully requested that Neath Port Talbot County Borough Council consider this planning application favourably and grant planning permission for the proposed development at Leiros Park, Neath.