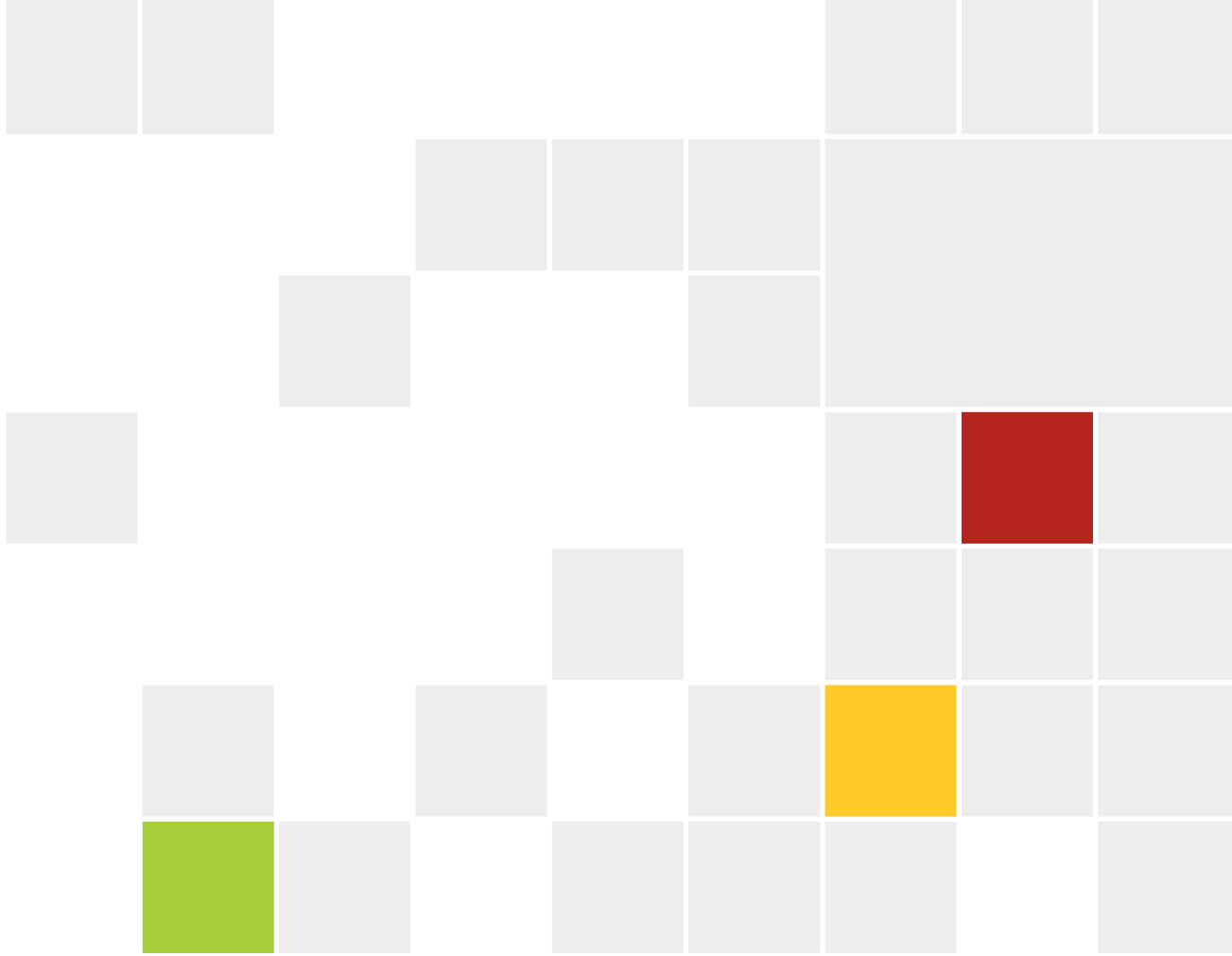
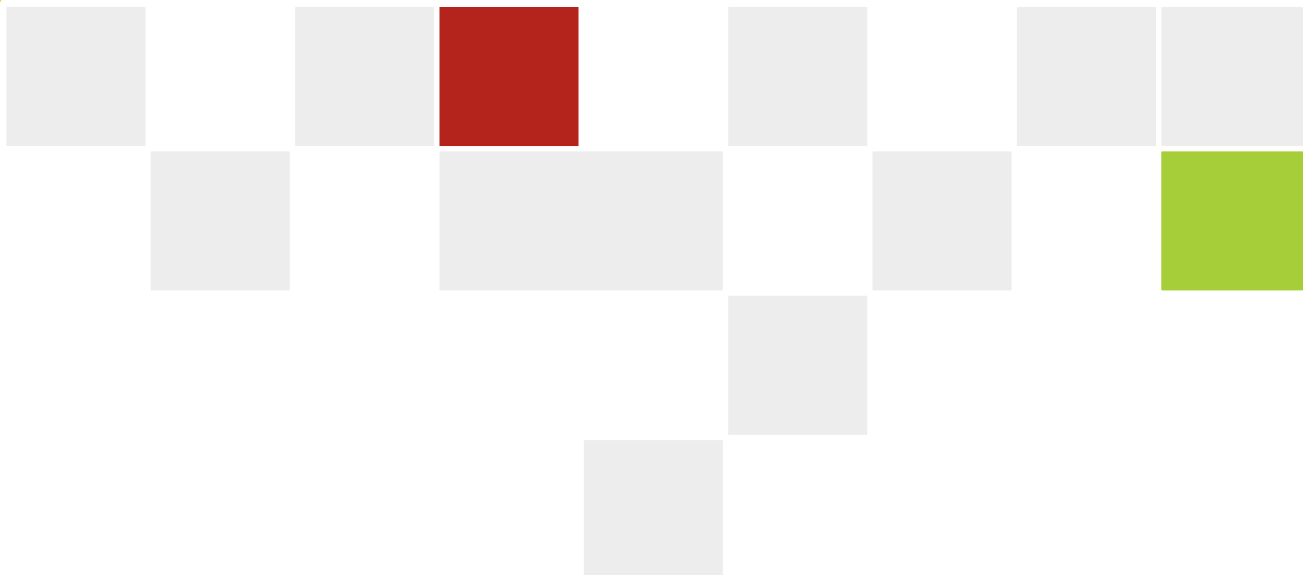




Land at Meadow Road, Neath

Planning, Design and Access Statement



Boyer

Report Control

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APPENDIX

Appendix One – Pre-App Response

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1. INTRODUCTION

- 1.1 This Planning, Design and Access Statement (PDAS) has been prepared by Boyer on behalf of our clients, Jones Brothers (Henllan) Ltd and Tai Tarian, in support of a full planning application for residential development at Land at Meadow Road, Neath.
- 1.2 The application seeks full planning permission for the development of 52 affordable dwellings and associated access, landscaping and site infrastructure and has been submitted to Neath Port Talbot Council (NPTC). The site is allocated for housing development within the NPTC adopted Local Plan.

Statement Structure

- 1.3 The remainder of the PDAS is structured as follows:
- A description of the application site and the background context to the submission (Section 2);
 - An explanation of the development proposal (Section 3);
 - A review of relevant national and local planning policy (Section 4);
 - A Design and Access Statement in accordance with national guidance (Section 5);
 - An appraisal of the key planning considerations regarding the proposed development (Section 6); and
 - A conclusion (Section 7).

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2. SITE AND CONTEXT ANALYSIS

Site Location and Description

- 2.1 The application site consists of an irregular parcel of land on the south eastern edge of Neath. The site extends to approximately 2ha and consists largely of agriculturally improved grassland with some mature trees within the meadows.
- 2.2 The topography of the site is relatively level and rises slightly towards the north and west. Along the south and west boundaries of the site, there are mature trees whilst to the east, there is an old dry stone wall in poor repair, which also has a line of trees along its boundary.
- 2.3 An overhead power cable crosses the site. There is also a culverted watercourse running underneath the centre of the site, which discharges to a watercourse towards the north east.
- 2.4 The site is bordered to the north and west by residential properties along Meadow Road and woodland; to the south by Eaglesbush House, Eaglesbush Cottages and residential properties along The Avenue; to the east by detached dwellings within large grounds and open countryside; and to the north east by woodland along Crythan Brook known as Eaglesbush Valley.
- 2.5 Access to the site is proposed from Meadow Road through a reconfiguration of an existing property within the applicant's control.
- 2.6 In the local area there are schools, a post office, convenience stores, churches and Melyn Park/Parc Melin within a short walking distance from the site. Additionally, there are bus stops on Meadow Road providing services to Neath and Neath Abbey. The site is located to the south of Neath town centre, where there is a greater variety of local facilities and services.

Site Context

- 2.7 The application site is within the Settlement Limit and is allocated for residential development in the Adopted Local Development Plan (LDP).
- 2.8 Neath, including Melincryddan, is identified as a 'Town' in the settlement hierarchy in the LDP.
- 2.9 The site is free from any other planning policy environmental designations. The woodland that sits adjacent to the north east of the site forms part of the Eaglesbush Valley Local Nature Reserve (sections of the Eaglesbush Valley are SINC, however not those adjoining the application site). The nearby Flood Zone C2 linked with Crythan Book is separated from the application site. There is also mature vegetation which includes TPOs. In terms of heritage, St Catherine's Church is Grade II* Listed and located approximately 300m north-west of the site.
- 2.10 The site is currently subject to a pending S73 application (Ref: P2019/5209) to extend the time of an outline planning permission for up to 50 dwellings plus associated infrastructure (original permission Ref: P2005/1808 and variation of condition 3 and 4 of original consent Ref: P2012/0151). The extant outline planning permission has therefore established the principle of residential development.

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- 2.11 Jones Brothers are working with Tai Tarian Housing Association (joint applicants) to deliver a 100% affordable housing scheme and provide much needed, high quality affordable housing to the area.
- 2.12 Context analysis is an important early stage in the design process. Key features of the site and surrounding area are below:
- The site rises slightly in the north east of the site
 - Mature trees, TPOs and areas of woodland
 - Access via existing residential street
 - Existing culvert
 - Established utility services connections

Pre-application Enquiry

- 2.13 A pre-application request was submitted to NPTC on 22nd October 2020. The Council's pre-application response was received on 30th November 2020 and is included at **Appendix 1**.
- 2.14 A pre-application meeting was then held between the applicant and NPTC planning officers on 7th December 2020, during which various elements of the scheme such as design and layout were discussed.
- 2.15 Key discussions were focused around the layout and open space areas, access and connectivity in addition to trees and ecology.
- 2.16 The proposed scheme has since been updated in response to the pre-application advice received and has included a revised layout with key improvements to open space areas and sensitive integration to the surrounding landscape in addition to justification for the access arrangements and additional off street parking.

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3. PROPOSED DEVELOPMENT

Application proposal

- 3.1 The proposed development, as described on the submitted planning application form, is as follows:

“Development of 52 affordable dwellings and associated access, landscaping and site infrastructure”

- 3.2 A schedule of accommodation is provided in the Sketch Layout Plan and is broken down as follows:

- 14 x 1-bed walk up apartments
- 5 x 2-bed bungalows
- 2 x 2-bed walk up apartments
- 22 x 2-bed houses
- 6 x 3-bed houses
- 3 x 4-bed houses

- 3.3 All of the proposed units will be affordable and are of a mix of types and sizes that responds to the local need.

- 3.4 Access will be served from a new route off Meadow Road. Residential development will be on either side of the new access road, which travels south, then continues eastwards and southwards through the development, before culminating in a turning head at the south east corner of the site. The access will ensure residents and other vehicles can manoeuvre safely in and out of the development.

- 3.5 Proposed drainage – SuDS will be incorporated organically into the scheme in accordance with engineering details and requirements and will include a Type 2 pumping station at the north east corner of the site.

- 3.6 Proposed landscaping – The scheme seeks to respect and maximise the existing mature trees and woodland where possible, particularly along the north eastern boundary, which will provide a buffer between the development and surrounding uses. There will also be new tree and wildflower planting and managed open space areas with natural trails and play.

Brief and Vision

Applicant

- 3.7 The applicants are Jones Brothers (Henllan) Ltd, a development and construction company based in South Wales; and Tai Tarian, a housing association working across Neath Port Talbot county borough.

Brief

- 3.8 A team of professionals has been assembled on behalf of the applicants to prepare the application, which includes:

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- Development and Technical Solutions Ltd (project management)
- Boyer (planning)
- Spring Design (design and engineering (including sustainable drainage infrastructure))
- TDA (landscape)
- Vectos (transport)
- Integral Geotechnique (ground conditions)
- Hawkeswood Ecology (biodiversity)
- Arboricultural Technician Services (arboriculture)

3.9 The brief to the project team was to collaborate effectively to secure full planning permission for a residential development that provides good quality, sustainable, affordable homes.

Vision

3.10 A clear vision has been established for the site as follows:

- Logical extension to the residential development along Meadow Road
- Connectivity with the existing neighbourhood including safe and convenient pedestrian links.
- 'Landscape first' approach - respect and celebrate the existing mature trees and woodland to maintain a strong green infrastructure framework
- High quality, sustainable design that respects the surrounding built and natural environment

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4. PLANNING POLICY CONTEXT

Introduction

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The 'Development Plan' in this case comprises the Neath Port Talbot Local Development Plan (LDP) adopted January 2016 and Future Wales: The National Plan 2040, adopted February 2021.
- 4.3 Material considerations at a national level include:
- Planning Policy Wales (PPW) Edition 11, published February 2021;
- Technical Advice Notes (TANs), including, *inter alia*:
- TAN 2: Planning and Affordable Housing
 - TAN 11: Noise
 - TAN 12: Design
 - TAN 18: Transport
- 4.4 At a local level, relevant supplementary planning documents include:
- Affordable Housing SPG, published October 2016
 - Design SPG, published July 2017
 - Planning Obligations SPG, published October 2016
 - Parking Standards, published October 2016
 - Biodiversity and Geodiversity, published May 2018
 - Open Space & Greenspace, published July 2017
 - Pollution SPG, published October 2016
- 4.5 The remainder of this section highlights relevant policy and guidance within the LDP, followed by a review of other relevant documents identified above.

The Development Plan

- 4.6 The site lies within the designated Settlement Limit under **Policy SC1** (Port Talbot) of the LDP. The policy states that within settlement limits, development that is proportionate in scale and form to the role and function of the settlement according to the Settlement Hierarchy will be acceptable in principle.
- 4.7 Within the Settlement Hierarchy, the site is within Neath (including Melincryddan) settlement, which is identified as a 'Town' which sits top of the hierarchy. Towns are described as "*regionally important settlements providing the widest and most diverse range of functions. Located on the strategic road network, they are fully accessible by a range of transport options*", thus Neath is a highly appropriate location for large scale residential development.

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- 4.8 **Policy H1** sets out the housing sites allocated for development. The site is allocated under reference H1/LB/6: Eaglesbush, Melincryddan. The main site characteristics, opportunities and constraints relate to Highways and the provision of off-site improvement works; Biodiversity surveys relating to the woodland area; the requirement for Affordable Housing; and Utilities infrastructure provision. In addition, there are contamination and archaeological considerations and the opportunity to provide open space.
- 4.9 Policy **SP8** states that provision for 1,200 affordable housing units will be delivered over the plan period (2011 – 2026) and **Policy AH1** further details that new housing developments in Neath will be required to provide a target 25% affordable housing.
- 4.10 The following policies are also of relevance to the proposed development:
- Policy SP1 – Climate Change
 - Policy SP3 – Sustainable Communities
 - Policy SP4 – Infrastructure
 - Policy I1 – Infrastructure Requirements
 - Policy SP7 – Housing Requirement
 - Policy SP10 – Open Space
 - Policy OS1 – Open Space Provision
 - Policy EN6 – Important Biodiversity and Geodiversity Sites
 - Policy EN7 – Important Natural Features
 - Policy SP16 – Environmental Protection
 - Policy EN8 – Pollution and Land Stability
 - Policy SP18 – Renewable and Low Carbon Energy
 - Policy SP20 – Transport Network
 - Policy W3 – Waste Management in New Development
 - Policy TR2 – Design and Access of New Development
 - Policy BE1 – Design
- 4.11 These policies relate to technical considerations and are therefore considered in more detail in Sections 5 (design and access) and 6 (key planning considerations), as well as the suite of technical information submitted with the application

Future Wales: The National Plan 2040

- 4.12 Future Wales was published in February 2021 and forms part of the statutory development plan, sitting alongside the adopted Neath Port Talbot LDP as the primary planning policy against which applications will be determined.
- 4.13 The most relevant policies in Future Wales are as follows:
- Policy 1 Where Wales will grow: Identifies Swansea Bay and Llanelli (which includes Neath Port Talbot) as one of three National Growth Areas, where there will be growth in employment and housing opportunities and investment in infrastructure.

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- Policy 2 Shaping Urban Growth and Regeneration – Strategic Placemaking: Supports urban neighbourhoods that provide a variety of housing types and tenures, are compact and walkable, organised around mixed use centres and public transport, amongst other things including the integration of green infrastructure.
- Policy 7 Delivering Affordable Homes: Welsh Government will increase delivery of affordable housing. Planning authorities should explore all opportunities to increase the supply of affordable housing.
- Policy 9 Resilient Ecological Networks and Green Infrastructure: Seeks to safeguard ecological networks and maximise green infrastructure through placemaking.
- Policy 28 National Growth Area Swansea Bay and Llanelli: This area will be the main focus for economic and housing growth in the south west region and includes Neath. An estimated 25,600 homes are needed in the region up to 2039 and for the first 5 years (to 2024), 44% of additional homes should be affordable.

National Planning Policy and Guidance

- 4.14 The Council will also refer to Government guidance contained within Planning Policy Wales 11 (February 2021) and Technical Advice Notes.

Planning Policy Wales – Edition 11 (February 2021)

- 4.15 Welsh Government planning policy is contained within Planning Policy Wales Edition 11, which was published in February 2021.
- 4.16 This has been prepared in the context of the Well-being of Future Generations Act (2015), which places a duty on public bodies to carry out sustainable development. It requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.
- 4.17 The Planning Act introduced a statutory purpose for the planning system. Any statutory body carrying out a planning function must exercise those functions in accordance with the principles of sustainable development as defined in the Well-being of Future Generations Act
- 4.18 Given the site's allocation in the development plan, matters of principle are less relevant and PPW's thrust towards sustainable development, as well as its design and technical policy, are most relevant. Significant weight is given in PPW 11 to the concept of sustainable development, and of maximising well-being through 'placemaking' within the design of new developments. "Placemaking" is defined as *"a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well being in the widest sense."*
- 4.19 Paragraph 2.3 states in relation to this that *"development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all."*

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4.20 To support this approach, the Placemaking Wales charter initiative has been developed. Various organisation can sign up to the charter by way of support and commitment to the following 6 placemaking principles:

- People and community – meeting people’s needs and enhancing a sense of community
- Location – efficient use of land to support and enhance existing places and connectivity
- Movement – prioritising walking, cycling and public transport and designing safe active travel routes
- Mix of uses – for community development, local business growth and access to jobs, services and facilities
- Public realm – well defined streets and public spaces that are welcoming, safe and inclusive
- Identity – value and respect the positive, distinctive qualities of existing places, including heritage, culture, language, built and natural physical attributes.

4.21 In addition to the concept of placemaking, PPW 11 also sets out how design is the relationship between all elements of the natural and built environment, stating the following:

‘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.’

(Paragraph 3.3)

4.22 It further states that:

‘To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surroundings area.’

(Paragraph 3.3)

4.23 Sustainable and active travel are also key themes within PPW 11. Paragraph 4.1.25 states that *“Design and Access Statements should demonstrate how the design of new or enhanced streets has responded to urban design principles, including the guidance in Manual for Streets and the Active Travel Design Guidance.”* The Active Travel (Wales) Act 2013 makes walking and cycling the preferred option for shorter journeys. Design and Access considerations are provided later within this report.

TAN2: Affordable Housing (2006)

4.24 TAN2 provides guidance to local authorities in planning for affordable housing and includes a definition of ‘affordable’: *“housing provided to those whose needs are not met by the open market...”* The definition includes both social rented and intermediate housing.

TAN11: Noise (1997)

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- 4.25 This TAN provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development.

TAN12: Design (2016)

- 4.26 TAN 12 states that a Design and Access Statement must explain the concepts and principles in relation to the following:

- Access;
- Environmental Sustainability;
- Movement to, from and within the development;
- Character (including amount, layout, scale, and landscaping); and
- Community Safety.

- 4.27 Paragraph 5.11.2 sets out more specific design objectives relating to new housing and states that design should aim to:

- Create places with the needs of people in mind, which are distinctive and respect local character;
- Promote layout and design features which encourage community safety and accessibility;
- Focus on the quality of the 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 buildings;
- 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; and
- Consider and balance potential conflicts between these criteria.

TAN18: Transport (2007)

- 4.28 This TAN recognises the role of the planning system in facilitating sustainable travel patterns. It seeks to influence the location of new development to reduce the need to travel and promote sustainable movement. However, TAN18 acknowledges that *“the car is important for accessibility in rural areas and is likely to remain so for the foreseeable future.”*

Supplementary Planning Guidance

Affordable Housing SPG (2016)

- 4.29 The SPG confirms that all affordable housing is expected to be of a high standard of design and that affordable housing mix should reflect local need.

Design SPG (2017)

- 4.30 The SPG provides further detail on the criteria of LDP Policy BE1 – Design.

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- 4.31 It also states that medium to large residential developments are required to take account of the relationship between the development and the neighbouring land uses, transport network, landscaping, retention of important features and connections to goods and services.

Planning Obligations SPG (2016)

- 4.32 The SPG sets out the Council's basis for requiring planning obligations as part of new development.
- 4.33 Regarding Transportation and Access, all proposals are subject to planning obligations regarding highways infrastructure where necessary.
- 4.34 Contributions to Education Facilities are sought where the proposed development would result in additional demand for school places.
- 4.35 Where there is an identified shortfall in Open Space provision, contributions for open space will be sought for developments of 3 or more units.

Parking Standards (2016)

- 4.36 The parking standards for housing development is 1 parking space per bedroom, with a maximum requirement of 3 spaces for residents, and 1 visitor space per 5 units.
- 4.37 The SPG also states that where evidence is supplied that shows car ownership levels will be lower than normal, a more flexible approach to parking space provision can be taken.

Biodiversity and Geodiversity (2018)

- 4.38 The SPG provides further guidance on LDP Policies SP15, EN6 and EN7 regarding the protection, conservation, enhancement and management of important habitats, species and sites.
- 4.39 To ensure that biodiversity and geodiversity impacts are fully understood and managed, the SPG requires that all existing or potential features are identified early in the development process and safeguarded where possible, for example through designing biodiversity into schemes through landscaping, site layout and SUDs.

Open Space & Greenspace (2017)

- 4.40 The SPG supplements LDP Policies SP10, OS1 and OS2, as well as the Planning Obligations SPG in relation to the provision of open space.
- 4.41 The categories of open space are: outdoor space, children's play, informal space and allotments.
- 4.42 When calculating open space requirements to be sought for new residential development, the following are considered:
- Open space requirement across the various categories per dwelling
 - Where there is existing over provision in any category, whether a shortfall in provision would result from the development

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- Where a S106 agreement is likely for off-site provision, the likely cost of open space provision for each category.

Pollution SPG (2016)

- 4.43 The SPG considers the causes and impacts of various types of pollution in Neath Port Talbot. It identifies how the relevant LDP policies must be implemented and how adverse impacts can be avoided or mitigated. The types of pollution considered are Air, Noise, Light, Land Contamination and Water pollution.

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5. DESIGN AND ACCESS STATEMENT

Introduction

- 5.1 This section of the Statement takes forward the key findings of the context analysis and uses these as guiding principles in the iterative process of forming a final scheme for the submission.
- 5.2 Design goals to achieve the vision for the site:
- Logical extension to the residential development along Meadow Road
 - 'Landscape first' approach - respect and celebrate the existing mature trees and woodland to maintain a strong green infrastructure framework
 - High quality, sustainable design that respects the surrounding environment
- 5.3 Relevant planning policy has also been analysed, with various LDP policies, SPG and national guidance having influenced the proposals. From a design perspective, LDP Policy BE1 (Design) provides a series of criteria which development proposals are required to meet.
- 5.4 Additionally, the technical information prepared by the consultant team has been fundamental in devising an acceptable scheme. Key technical considerations are discussed within this section where appropriate, but also in Section 6 in relation to relevant planning policy.
- 5.5 The Pre-Application discussions established important principles for the proposal:
- High quality open space areas with natural surveillance and natural play
 - Safe and convenient access
 - Sensitive landscaping and landscape buffers
 - Integrated sustainable drainage features

Design Evolution

- 5.6 The design team has worked together with the wider professional team to develop the concept design. A number of surveys were undertaken, including a Topographical survey, Tree survey, Ecological assessment, Drainage survey and Utilities assessment. The surveys formed the basis for the initial site analysis and enabled an understanding of the baseline constraints and opportunities at the site.
- 5.7 Initial concept schemes were then developed to explore viability and access arrangements. Previously, outline permission Ref: P2005/1808 included access via the grounds of Eaglesbush House. However as some existing housing on Meadow Road is under Tai Tarian's ownership, this access design can now be altered to reconfigure an existing dwelling to provide access from the established highway route along Meadow Road.
- 5.8 The design process has evolved over time with collaborative input from the consultant team. Of key importance to the design evolution has been a 'landscape first' approach, high quality and sustainable housing, and organically integrated SuDS.

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5.9 The Pre-app response from officers has also been fundamental in the evolution of the scheme. Following the pre-application comments the scheme was updated to include the following:

- Total number of dwellings reduced from 53 to 52 for an updated housing mix (houses in plots 12-15 replaced with walk up flats to help compensate for loss of units in area of open space /woodland).
- Revised lower (north eastern) end of the site to allow for outward looking development onto the woodland. In addition utilising the road as the requisite buffer between the site and the woodland.
- Revised the enlarged area of open space to ensure it can be multi-purpose – used for suds /biodiversity and incorporate a natural play area. Reconfigured houses to overlook this space and also open up the area to tie into adjacent woodland, also an opportunity for natural open space /play.
- Introduced a natural footway link through the woods to the site entrance, in doing so linking to the area of trees T203+205 which was also identified as an opportunity for natural play.
- Generally reconfigured plots to improve relationships with trees/parking.
- Altered the area around the large oak tree to a communal garden for the walk up flats.
- Off-street parking added near to site access.

5.10 Further detail is provided in the attached Architectural Appraisal prepared by Spring Design.

Design and Access

5.11 In accordance with the Welsh Government guidance set out in TAN 12: Design and the Design Commission for Wales guidance on Design and Access Statements, these matters are discussed under the following key headings:

- Character (including considerations of placemaking, amount and density, streets, spaces and public realm, uses and tenure, scale, layout, heritage and detail design);
- Access;
- Movement;
- Environmental sustainability; and
- Community safety.

Character – Placemaking

5.12 A key aspect of placemaking is the relationship of the natural and built environment. As an edge of town location, the site has excellent connectivity to the surrounding settlement and its facilities. This ensures future residents will have an opportunity to prosper in these environments to the fullest sense.

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- 5.13 Design goes beyond architecture and extends to the relationship between people, spaces and buildings. In terms of the site, achieving placemaking aspirations will involve integrating with the surrounding built and natural environment as best as possible. The proposed dwellings will be of similar character to the existing surroundings, with a range of bungalows, walk up flats and traditional detached, semi-detached and terraced houses. The emphasis on green infrastructure throughout the scheme will also ensure integration with the natural environment.

Character – Amount and Density

- 5.14 The proposed development includes 52 affordable dwellings. The number of dwellings is in line with the site allocation requirements, which estimated 50 dwellings being delivered at the site.
- 5.15 The scheme will also be 100% affordable, which far exceeds the 25% LDP policy requirements for affordable housing.
- 5.16 The allocated site effectively forms the net developable area and therefore the net density equates to approximately 26 dwelling per hectare for the site area, however this includes natural open space and accordingly the developable area includes dwellings at an appropriate density reflective of the site's location and character.

Character – Streets

- 5.17 The entrance to the site is signified by a proposed junction at the highway, off Meadow Road. There will be an area of informal open space and bespoke buildings to help create a distinct entrance to the development.
- 5.18 The development pattern at the entrance and throughout the site responds to the existing adjacent houses, in order to integrate with existing housing in Melyn whilst retaining some of its own character.
- 5.19 The streets have been designed to create visual interest, with focal buildings located to provide a terminating vista on approach. There are also several dual aspect houses, front gardens, footpaths, car parking, retained mature trees, new planting and SUDS features.

Character – Spaces and Public Realm

- 5.20 In terms of public realm, the scheme places landscaping and green infrastructure at its heart. The existing mature trees and woodland at the site will be retained where possible to create focal points in various locations. Informal areas of open space are provided throughout the site, guided by the areas of existing green infrastructure to help create a sense of place. A footpath is also proposed in the north of the site to provide future residents with access to nature.

Character – Uses and Tenure

- 5.21 The proposed use of the development is affordable residential dwellings. All the units will be affordable and managed by Tai Tarian Housing Association.

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- 5.22 A mix of 1, 2, 3 and 4-bed houses, bungalows and flats are proposed, which will meet the local need and encourage a diverse resident population, potentially comprising single people, couples, families, and over 65s. These additional residents will have a positive effect on the longevity of local facilities and businesses in Neath.

Character – Scale

- 5.23 A variety of types of dwellings are proposed, comprising walk-up flats, bungalows, and two storey houses. The dwellings will be of appropriate massing and density to assimilate with the character of surrounding development in Neath.
- 5.24 The housing layout includes a mixture of detached, semi-detached and terraced housing to respond to the surrounding development.

Character – Layout

- 5.25 As discussed, the layout of the development seeks to provide a logical extension to existing residential development, to respond to the surrounding character. This represents the most effective and efficient layout.
- 5.26 Dwellings are orientated around the site entrance in a way to add visual interest at the gateway to the development. Dwellings are orientated to face onto streets or open spaces, with their gardens backing onto site boundaries to avoid any undue overlooking to the adjacent dwellings. Existing trees and proposed soft landscaping along the site boundary will also serve as a landscape buffer to protect the amenity of the surrounding residential and natural environment.
- 5.27 A mixture of parking to the front and sides of properties is used and deemed appropriate in this location. In addition, the road layout has been defined by the existing culvert easement through the centre of the development.
- 5.28 Drainage infrastructure will be located in the north eastern corner of the site, and will be landscaped to ensure a sufficient 15m exclusion zone from the residential area.

Character – Heritage

- 5.29 Other than the presence of a Grade II* Listed Building (St Catherine's Church) 300m north of the application site and separated by existing development around Meadow Road and Old Road, the site and surrounding area is free from heritage constraints, thus there will be no detrimental impact on heritage.

Character – Detail Design

- 5.30 An architectural assessment of the surrounding residential development was undertaken, demonstrating the variety of existing appearances and materials. It is proposed that the new development will utilise similar materials and renders in order to effectively assimilate with the local setting and character.
- 5.31 The proposed elevations are traditional in approach with simple materials and form in line with dwellings within the vicinity.

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- 5.32 Regarding boundary treatments, 1.8m high close boarded timber fencing is proposed around the property gardens, as well as 1.8m high brick screen walls with brick piers at corner plots 4, 40-41, 16, 18 and 34, and along the car parking spaces for plots 38-41.
- 5.33 The road will be tarmacked with areas of brick paving also used in the south east and south west corners. Additionally, SuDS features are proposed along the pavement edge.

Access

- 5.34 Vehicular and pedestrian access to and from the site will be facilitated through the proposed extension to the highway at Meadow Road.
- 5.35 There is good pedestrian permeability throughout the site, with a second pedestrian exit via the proposed footpath to the south of the development, which links with an existing footway.
- 5.36 The proposed vehicular route and turning head in the south east corner of the development aims to provide safe and practical accessibility in, around and out of the site.

Movement

- 5.37 Safe pedestrian access to local facilities and public transport connections in Neath is facilitated by existing lit footways along Meadow Road, Old Road and School Road, as well as throughout the wider urban area and towards Eaglesbush Valley.
- 5.38 Bus service 4 serves Meadow Road (2 minute walk from the site entrance) which connects Melyn to Neath Town Centre and Neath Abbey. Bus route X5 serves Furnace Terrace (approximately 11 minute walk from the site entrance) with services to and from Swansea. In addition, Neath train station and Park and Ride facility is approximately 1.2 miles away.
- 5.39 Policy compliant car parking is provided, as described in Section 6 of this statement. The proposed parking allocation is 1 space per bedroom with a maximum of up to 3 spaces. The proposed layout includes additional parking for existing residents to avoid on street parking.
- 5.40 Overall, the site is sustainably located within a Town and will connect directly to the highway network, public transport stops and existing travel routes. Therefore the development is considered to encourage both sustainable and active travel.
- 5.41 Further details and maps are provided within the attached Archaeological Statement.

Environmental Sustainability

- 5.42 The site's environmental constraints have been fully assessed and accounted for through the design of the scheme.
- 5.43 A comprehensive approach to green infrastructure, biodiversity enhancement and sustainable drainage has been designed into the heart of the development. In particular, an effort to retain the existing mature trees and woodland has been made in the interest of protecting and celebrating the natural environment.

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- 5.44 A variety of ornamental and native tree planting, as well as wildlife-friendly wildflower, hedgerow planting and rain gardens will be used to enhance the street scene.
- 5.45 Hard and soft landscaping, comprising fencing and planting, will be utilised to provide appropriate buffering for areas of woodland and protected trees.
- 5.46 With regard to energy efficiency, the development will be required to comply with DQR (Development Quality Requirements), which represent a high standard for affordable housing construction in Wales that ensures development is energy and resource efficient.
- 5.47 Kerbside refuse collection will be operated within the development.

Community Safety

- 5.48 The layout, orientation and arrangement of properties and parking areas ensures maximum natural surveillance to the benefit of community safety. Street lighting will also be included within the development.
- 5.49 It is considered that secured by design principles have been adhered to in the proposed development.

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6. KEY PLANNING CONSIDERATIONS

6.1 Further to design and access matters considered in the previous section, the key planning and technical issues pertinent to the consideration of this application are as follows:

- Principle of development
- Highways
- Drainage
- Trees and landscape
- Biodiversity
- Other matters

Principle of development

- 6.2 The principle of residential development at the site is established primarily through the allocation in the adopted LDP. Under LDP Policy H1, the site is allocated with the reference H1/LB/6 – Eaglesbush. The main site characteristics, opportunities and constraints relate to Highways, Biodiversity, Affordable Housing, Utilities, Contamination and Open Space. Each of these matters have been addressed within various chapters of this PDAS, as well as the suite of additional technical documents and plans submitted with the application.
- 6.3 The site is located within the defined settlement boundary as set out in LDP Policy SC1, where residential development is acceptable in principle. Furthermore, it is located within the designated ‘Town’ of Neath, which benefits from a number of facilities and amenities including retail, restaurants, takeaways, public houses, health centres, community centres, churches, and open space. Neath is therefore a highly appropriate and sustainable location for large scale residential development.
- 6.4 Additionally, the site has previously been granted outline planning permission for ‘residential development plus associated infrastructure’ (Ref: P2005/1808), demonstrating that the LPA considered the site suitable for residential development.
- 6.5 The principle of development is therefore strongly evident in the site’s LDP allocation, location within Neath settlement and its planning history.

Highways

- 6.6 According to LDP Policy H1, the allocated site has highways capacity for a maximum of 50 dwellings. However, the previous outline application for 50 dwellings was based on the proposed access from Eaglesbush House. Now that direct access to the site is proposed via Meadow Road, the site is considered capable of accommodating the proposed capacity of 52 dwellings.
- 6.7 The submitted Transport Statement provides justification for the proposed access arrangement which is considered appropriate for the nature and scale of development.

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- 6.8 A number of off-site highways improvements are also proposed to support the development. For example, there will be a new junction from Meadow Road to provide access to the site, all necessary signage and markings, as well as off street parking provision to relieve the existing parking situation.
- 6.9 The type of housing proposed includes for example, 1 bedroom affordable flats, which is likely to result in lower car ownership than would be associated with larger, standard open market dwellings. This will serve to limit the number of vehicles on site, the number of additional car journeys in and out of the site and encourage active travel modes. The area benefits from good pedestrian connectivity, which will also contribute to active travel.
- 6.10 Sufficient car parking is provided in accordance with the appropriate standards with one space per bedroom and a maximum of up to 3 spaces. This demonstrates compliance with LDP Policy TR2.
- 6.11 The anticipated additional vehicle movement associated with the proposal is not considered to have a detrimental impact upon the highway network and as set out within the site allocation requirements, highways contributions will be provided where necessary.

Drainage

- 6.12 The proposal includes integrated sustainable drainage infrastructure, a Type 2 Pumping Station, located in the north east corner of the development. Its location near to the existing wooded area ensured the infrastructure will be appropriately screened from surrounded uses.
- 6.13 In keeping with the vision for a landscape led scheme, the infrastructure will be landscaped with two types of wildflower mix planting, grass areas, native tree planting and rain gardens to enhance the street scheme and provide multi-functional open spaces.

Trees and landscape

- 6.14 The site is adjacent to Eaglesbush Valley Local Nature Reserve and partly comprises some woodland.
- 6.15 As such, the scheme adopts a landscape first approach to retain existing site features wherever possible. The proposed layout addresses the various site constraints in order to minimise the need for tree removal. For instance, there are a number of TPOs along the western boundary of the site adjacent to Eaglesbush House, so the revised access from Meadow Road means that these trees can be retained.
- 6.16 Furthermore the proposed layout has evolved with changes to the internal road to allow sufficient buffers with woodland to the north east.
- 6.17 Other existing trees throughout the development and particularly along the site boundary will be retained where possible to provide screening and an attractive natural environment for future residents.

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- 6.18 In addition, new landscaping comprising the planting of native and ornamental trees, shrubs, grass, wildflowers and native hedgerows will further integrate the existing landscape character on site and contribute to achieving good design and placemaking objectives.
- 6.19 Further detail is contained within the full suite of landscape and green infrastructure information that has been prepared by TDA and submitted as part of this application.

Biodiversity

- 6.20 As the site lies adjacent to Eaglesbush Valley Local Nature Reserve and partly includes mature trees and woodland, a Preliminary Ecological Appraisal (PEA) and survey reports have been prepared by Hawkeswood Ecology and submitted as part of the application. The report identified that the main ecological features on site are the mature trees and woodland area, noting that the trees on site have potential to support bats and breeding birds. However, the proposed developable area of grassland has low species diversity due to its current use for grazing.
- 6.21 In accordance with Policies EN6 and EN7 of the LDP, various features and assets which encourage biodiversity will be conserved and enhanced where possible. The appropriate mitigation measures proposed include retaining mature trees and protected trees wherever possible, new tree planting, appropriate buffers from the woodland area wherever possible, and using close board fencing along garden boundaries and the site boundary to isolate the development from surrounding woodland.

Other matters

- 6.22 Other matters of consideration and subject to pre-application discussion are technical aspects which have been covered in the application submission.
- 6.23 Ground conditions, including coal risk have been investigated in an accompanying report prepared by Integrale which finds no reason for development not to proceed, subject to further works ahead of construction as recommended in the report.
- 6.24 Construction and waste management have been considered and plans are included which look at the waste hierarchy and how waste and construction impacts are minimised, in accordance with LDP Policy W3.
- 6.25 Further considerations on lighting, retaining structures and archaeology are able to be dealt with through appropriately worded conditions.

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7. CONCLUSION

- 7.1 This Planning, Design and Access Statement has been prepared to accompany and support an application for full planning permission for the development of 52 dwellings on Land at Meadow Road, Neath. The application is submitted on behalf of Jones Brothers (Henllan) Ltd and Tai Tarian.
- 7.2 The application site is allocated within the Neath Port Talbot Council adopted LDP under Policy H1 'Eaglesbush, Melincryddan'. The development will comprise 52 affordable dwellings to be operated and managed by Tai Tarian Housing Association.
- 7.3 Pre-application consultation and engagement has been undertaken to ensure the acceptability of the proposed development. This has included non-statutory pre-application discussion with officers in addition to the statutory pre-application consultation (PAC) process with the local community. The proposed development has evolved as a result of pre-application engagement.
- 7.4 The principle of residential development at the site is established through the allocation in the adopted LDP, its location within the settlement boundary and the previous outline planning permission.
- 7.5 In accordance with the LDP, the scheme has been designed to provide high quality affordable housing that is sensitive to the surrounding land uses. The scheme represents a logical extension to the existing residential area and will substantially contribute to the affordable housing stock in Neath.
- 7.6 The site is sustainably located on the south eastern edge of Neath town. It is within walking distance to a variety of shops, schools, open space, public transport facilities. New pedestrian links as well as suitable vehicular access and car parking will also be provided.
- 7.7 A landscape led approach to green infrastructure, biodiversity enhancement and sustainable drainage is incorporated within the site design. This includes the retention of existing mature trees and woodland, as well as other features including native and ornamental tree planting, wildflower planting, rain gardens and other soft landscaping.
- 7.8 The proposal will result in the delivery of an allocated site and provide much needed affordable housing in this part of Neath Port Talbot. It is therefore considered that planning permission should be granted without delay.

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APPENDIX ONE – PRE-APP RESPONSE

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Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad	30 th November 2020
Direct line Rhif ffôn	01639 686755
Email Ebost	h.bowen@npt.gov.uk
Contact Cyswllt	Helen Bowen
Your ref Eich cyf	
Our ref Ein cyf	Q2020/0186

John-Rhys Davies
Boyer
Third Floor
Park House
Greyfriars Road
Cardiff
CF10 3AF

BY EMAIL ONLY

Dear Sir,

Town and Country Planning Act 1990

Pre-App. Ref.: Q2020/0186
PROPOSAL: Residential development - Non statutory
LOCATION: Land North East Of Eaglesbush House Pencaurau Neath SA11 2AA

I refer to your correspondence received on 28 October 2020, concerning the above and your request for pre-application advice. Having considered the nature of submission, I respond as follows.

Local Context and Constraints

- Contaminated Land.

Amgylchedd ac Adfywio

Ceri Morris Pennaeth Cynllunio a Gwarchod y Cyhoedd

Y Ceiau, Ffordd Brunel, Parc Ynni Baglan, Castell-nedd SA11 2GG
Ffôn 01639 686868

Environment and Regeneration

Ceri Morris Head of Planning and Public Protection

The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG
Tel 01639 686868

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

- Tree Preservation Orders- T102/A1, T21/W3, T312/W1, T231/T1, T231/T10, T231/T2, T231/T3, T231/T4, T231/T5, T231/T6, T231/T7, T231/T8, T231/T9, T244/T1, T244/T2, T244/T3, T312/T1.



- Local Nature Reserve



- SINC Watercourse
- SINC Woodland



- High Risk Coal Area



- GGAT Sites- Site: Manorial Fulling Mill, Eaglesbush, Neath



- Public Rights of Way



Please note that this information is based on our current records and is, as far as possible, accurate. Nevertheless, we reserve the right to advise you of any additional constraints that may be identified at the time of your application.

Relevant Planning History

From an examination of our records, the application site/ property has the following relevant planning history:

Reference: P2003/0036

Proposal: LOPPING OF TREES COVERED BY TREE PRESERVATION ORDER NO T87

Decision Date: 01-JAN-04

Reference: N1994/0516

Proposal: TREE PRESERVATION ORDER NO. 12: LOPPING OF TREES ALONG ACCESS ROAD TO FARM.

Decision Date: 18-MAR-95

Reference: P2012/0151

Proposal: Variation of condition 3 of Planning Permission P2005/1808 (Approved on the 24/3/09) to extend the period of the submission of reserved matters for three years.

Decision Date: 15-JUL-16

Reference: P2005/1808

Proposal: Outline application for a residential development plus associated infrastructure

Decision Date: 24-MAR-09

Reference: P2019/5209

Proposal: Variation of condition 3 and 4 of planning permission P2012/0151 approved on 15/07/2016 to extend the period to submit the reserved matters for 3 years and to extend the time limit for the commencement of development for a further 5 years (additional ecology info received 29/01/2020)

Relevant Planning Policies

In addition to national guidance contained within Planning Policy Wales, any application would be considered against the Policies within the Adopted Neath Port Talbot Local Development Plan, details of which are available on the Council's web site by visiting www.npt.gov.uk/ldp .The relevant policies would include:

Strategic Policies

- | | |
|----------------------|--------------------------------|
| • Policy SP1 | Climate Change |
| • Policy SP3 | Sustainable Communities |
| • Policy SP4 | Infrastructure |
| • Policy SP7 | Housing Requirement |
| • Policy SP8 | Affordable Housing |
| • Policy SP10 | Open Space |
| • Policy SP15 | Biodiversity and geodiversity. |
| • Policy SP16 | Environmental Protection. |

- **Policy SP18** Renewable energy and low carbon energy
- **Policy SP19** Waste Management
- **Policy SP20** Transport Network

Topic based Policies

- **Policy SC1** Settlement limits
- **Policy I1** Infrastructure requirements
- **Policy H1/LB/6** Housing Sites
- **Policy AH1** Affordable Housing
- **Policy OS1** Open Space Provision
- **Policy EN6** Important Biodiversity and Geodiversity Sites
- **Policy EN7** Important Natural Features
- **Policy EN8** Pollution and land stability
- **Policy RE2** Renewable and low carbon energy in new development
- **Policy W3** Waste management in new development
- **Policy TR2** Design and Access of New Development
- **Policy BE1** Design

Supplementary Planning Guidance:

The following SPG is of relevance to this application: -

- 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)

All of the above SPG can be viewed on the [Council's website](#).

Analysis of Proposal

The submission seeks pre-application advice ahead of submitting a full planning application for a proposed residential development of 53 affordable dwellings at land at Meadow Road, Neath.

It is stated in your cover letter that the site comprises approximately 2ha of land south east of Meadow road, Pencaurau, Neath. The site is bordered to the west by the residential properties of Meadow Road and woodland, to the south by Eaglesbush House, Eaglesbush Cottages and the residential properties of the Avenue, to the east by detached dwellings within large grounds and open countryside and to the north east by woodland along Crythan Brook known as Eaglesbush Valley.

The description goes further to add that;

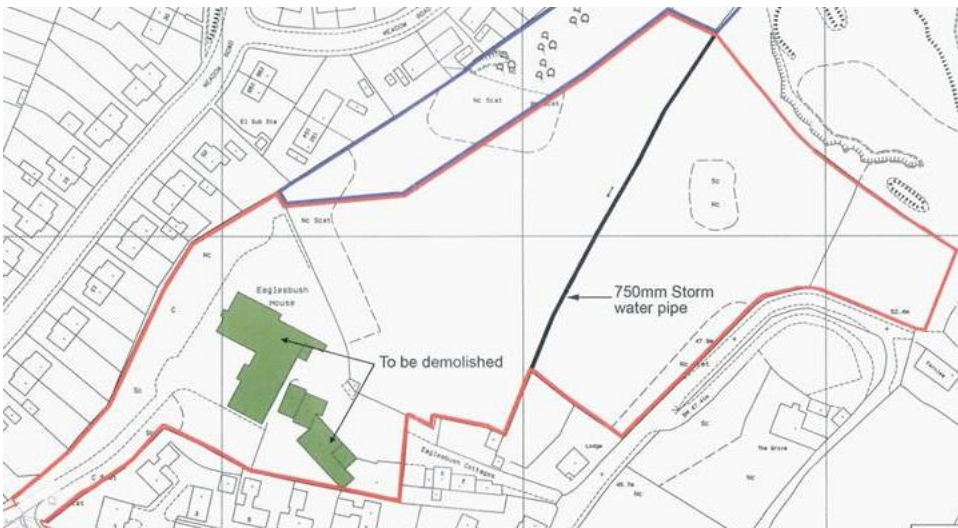
The majority of the site consists of agriculturally improved grassland with some mature trees

within the meadows. The site topography is relatively level, rising slightly towards the north and west. The field boundaries to the south and west include mature trees and to the east of the site is an old dry stone wall which is in poor repair and also has a line of trees along its boundary.

The application is supported with an indicative layout as shown below, together with a drainage and engineering layout.



The application refers to previous, and current applications, however, as noted below the site area is not the same, and the fundamental differences being the exclusion of Eaglesbush House complex and the alternative access proposals. Noting that additional land is also included within your proposed application site previously edged blue.



As this proposes an alternative site and proposal, this reply would be based on a potential submission of a full planning application, and current validation requirements, together with existing planning policy and legislation. There appears no merit in referring back to other proposals as these are not material to the consideration of this potential full planning application.

Principle of development.

The site appears to lie within the defined settlement limits for the area as set out under Policy SC1 of the Local Development Plan. In addition the majority of the site is allocated for Housing specifically under Policy H1/LB/6.



Housing allocation. (Land Bank Site)
This Refers to up to 50 dwellings on a site of 2.5ha.

In principle therefore the development of residential development within settlement limits, and within a partially allocated housing site would appear acceptable, subject to compliance with all other relevant policies within the development Plan and associated Supplementary Planning Guidance.

Policy BE1 states, that development should achieve a density of 35 dwellings per hectare. Based on your information the development would only provide 26.5 dph and therefore would not accord with this criteria. However, as noted previously, you appear to be including land that is woodland and protected by TPO. As such the DPH may increase if the application site is amended to remove these areas within which no work appears to be taking place. These can be edged blue, as noted under the previous applications. Any application where there is no robust justification for a reduction in density would not comply with the aforementioned policy requirement, and therefore receive a negative recommendation.

For a development of this scale the application will need to provide open space with resident and visual amenity value, a minimum of 25% affordable housing, and would need to address the requirements of Policy W3 which states that;

Proposals for new built development will need to demonstrate that provision is made for the design, layout, storage and management of the waste generated by the development both during the construction phase and occupation. The following proposals will be required to produce Site Waste Management Plans:

(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

5.3.129 This policy relates to all new built development including residential, industrial, commercial and retail. Early consideration of the waste management needs for any proposal is essential to ensure planning for waste is considered at the outset.

5.3.130 Where appropriate, Site Waste Management Plans will be required which would state

how the waste will be dealt with. An assessment of the waste generated by the development will be required at the planning application stage.

Layout, design and character.

The submission is supported by a “Architectural Appraisal” but appears to be more of a master planning document, or site interpretation document, setting out existing constraints and site features which have informed your indicative layout. There are no details provided or alternative layouts, or architectural details in relation design of properties or character.

There is a limited amount of detail therefore in order for the Authority to make an informed opinion on which to offer detailed advice or guidance, however, there are some layout issues that we would wish to see further clarification on, and/or changes to reflect these comments.

The document submitted refers to “Informal areas of open space provided throughout scheme” For a site of this scale and relative separation from surrounding areas, the Authority would wish to see these areas provided in a way that allows them to be used for amenity value. At this time these areas are not linked, have poor value as usable spaces for amenity value. These also add little to creating a character within the site, and in most cases are poorly overlooked, and are at risk of creating antisocial issues in the future. This is especially apparent on the larger areas as highlighted on the plan below.



The site clearly benefits from natural features, and it is considered that a more sympathetic layout and design could create improved character, more usable connected amenity spaces, utilising these areas, which are overlooked and create value to the street scene for residents, plus improved pedestrian connectivity and amenity and biodiversity value.

In addition it is unclear if the relevant distances off the protected habitat and trees on site are appropriate. Some of the development appears in close proximity to mature trees and this results in pressure in the future on this for removal or reduction. Evidence that there are sufficient and appropriate distances not just in relation to root protection, but also ecological and long-term management of these areas will be required to allow the Authority to consider the impacts.

At this time we would have concerns over the layout based on the above, notwithstanding any future comments on the layout and design in respect of the properties themselves. In addition there are clearly visual impacts on the creation of this new access, and potential amenity issues. The existing gradients may necessitate retaining works or features to construct an access with appropriate pedestrian links. At this time no details are provided that would allow the authority to robustly consider the impacts of the access on these issues.

Impact on Trees

The Authority's Arboricultural Officer has advised that the submitted site layout plan (ref:2330-00(02)100) plots / house numbers 1, 14, 50, 51, 18/19, 20/21, 40/41 and 42/43 will be in close proximity to the existing trees. If these trees are not pruned before or during the construction works it is highly probable that the new residents will submit applications to remove or prune the trees or undertake the work without permission. In addition, there are a number of footpaths within the root protection area of the category A Oak tree T200. Any works within the root protection area should be avoided but if there is no alternative the footpath will need to be installed using a no dig system and placed on a geogrid system. A method statement will need to be produced and submitted and the works will need to be supervised by a suitably qualified arborist. To avoid serious damage to the trees it is critical that the guidelines and recommendations in BS5837:2012 Trees in relation to design, demolition and construction are followed at all times.

Highway and pedestrian safety

Policy TR2 identifies that proposals will only be permitted where there are appropriate levels of parking and cycling facilities provided. The development has to be accessible by a range of travel means, including public transport and safe cycle and pedestrian routes.

In relation to any off-site improvements required to address Active Travel, reference should be made to paragraphs 5.3.6 – 5.3.8 of the Planning Obligations SPG. The Parking Standards SPG (October 2016) also gives guidance on the level of parking required and Appendix D Note D.6 states that all residential developments must be accessible by cycles and cycle storage must be a factor of dwelling design. Making walking and cycling the most attractive means of travelling for short journeys would be beneficial.

'All development proposals will be expected to demonstrate high quality design. Proposals will only be permitted where it plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and

ensures linkages with the existing surrounding community.'

The proposal has been assessed by the Head of Engineering and transport (highways) who have advised that they have no objection to the proposal however have raised the following comments:

- A Transport Statement (Not a TIA) is required, this new access is an alternative to that already approved under planning application P2005/1808, the access proposed onto Meadow Road currently facilitates approx. 158 existing dwellings plus the new proposed access on to Meadow Road will add an additional 53 new dwellings on to the highway network – total of 211 existing and proposed.
- All works to be constructed on the public highway shall be subject to Road Safety Audits, stages 1 to 4 in accordance with HD19/03 of the Design Manual for Roads and Bridges. Each stage of the Road Safety Audit shall be submitted for approval in writing by the Local planning Authority. All issues highlighted at each stage, being addressed to the written approval of the Local Planning Authority within 3 months of that stage of that Road safety Audit has been approved.
- The original planning application P2005/1808 requires a maximum of 50 dwellings from this site. Now the applicant proposes to construct 53 dwellings and our current Highway Design Guide requires dwellings of 50 to 100 requires a loop arrangement. This development would require a loop within the site to allow for adequate movement throughout the development.
- The existing build out within Meadow Road is very close to the proposed junction and would only seek to encourage vehicles to speed up along the one-way system to get through the narrowing before any oncoming traffic, which would be a highway safety risk to vehicle and pedestrians. This needs to be reviewed as part of the off-site works and RSA.
- Vehicular junction visibility splays together with forward visibility shall be compliant with Manual for Streets based upon the known speed limit and annotated on plans.
- The development shall show pedestrian visibility splays of 2.4m by 2.4m from the back of footway and either side of driveways.
- A Construction Method Statement is required which shall include details of the following:
 - a. the parking of vehicles of site operatives and visitors
 - b. loading and unloading of plant and materials
 - c. storage of plant and materials used in constructing the development
 - d. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
 - e. wheel washing facilities
 - f. measures to control the emission of dust and dirt during construction
 - g. a scheme for recycling/disposing of waste resulting from demolition and construction works
 - h. scheme for the erection of temporary/semi temporary signage warning drivers of the presence of children and speed restrictions.
 - i. The Construction Method Statement shall be signed by a competent person(s).

- A schematic street lighting design is required.
- Details of the location of recycling and waste bin storage areas are to be shown on plan. The council refuse and recycling vehicles will only pick up on kerb side collection points only.
- New Junction fronting onto Meadow Road has radii which is below current adoptable standards – they need to have a minimum of 6m kerb radii and 5.75m back of footpath to accommodate larger footway radii and adequate tactile crossing area.
- If any highway retaining walls are required details of the retaining wall(s) together with structural calculations are required.
- The internal highways shall be designed with any unrestrained lengths no greater than 60metres.
- Within the development all houses fronting onto the highway shall be provided with a 2m footway minimum.
- At the location of the proposed access, Meadow Road is showing a carriageway width of approximately 4.7- 4.8m this below the minimum width of a carriageway which should be 5.5m to facilitate two way traffic.
- Highway gradients and straights approaching junctions shall be compliant with the councils design guide and specification for adoption of highways.
- Parking shall be compliant with the Authority's Parking Standards SPG [Oct 2016].
- Whilst the applicant has provided an indicative layout/Scheme for off-site works, a more detailed engineering layout/plan/proposals of the access together with any swept path analysis of the largest delivery and/or refuse vehicle that will service the development will be required.
- The applicant needs to consider Active Travel for this development.
- In respect of landscaping proposals ,no trees shall be planted within the footway nor shall any trees be planted within 2m of the back of footway unless a suitable root barrier is placed along the back of footway.
- If the scheme incorporates garages within the development then they need to be 6m by 6m for a double garage and 6m by 3m for single garages.

- All single driveway lengths shall be a minimum of 6metres long and compliant with the Authority's highway design guide.
- Any and all shared driveways shall have a maximum length 25m including a minimum width of 4.5m and with an adequate turning facility, to ensure compliance with the Authority's highway design guide.

Biodiversity

As identified above, Policies EN6 and EN7 will be of relevance insofar as there is a need to ensure any impacts on biodiversity/ natural features are appropriately assessed and, where applicable, mitigated.

Accordingly, you are advised of the need to undertake an Extended Phase 1 habitat survey of the site for submission as part of your application. This survey should include the identification of the presence of s7 Environment (Wales) Act (s42 NERC Act 2006)/ LBAP habitats and species, and sites that meet SINC criteria, in addition to protected species. A balance of s7/LBAP/SINC habitat loss/gain to the scheme should be included, and the surveys should cover all areas that may be impacted by the scheme.

It will be important to follow any recommendations made within the phase 1 survey, insofar as they relate to the need for further more specific surveys (e.g. bird surveys, reptile surveys) since failure to submit such additional surveys would mean that your application would be invalid. Given that the survey seasons can be limited, failure to plan ahead may also lead to a significant delay in registration, and consequently impact on project timescales.

You will also need to put forward proposals for mitigation/compensation for any adverse impacts identified in the above assessments.

Once you have the results of the survey, you are therefore strongly encouraged to liaise further with the Council's Countryside & Wildlife team (Tel: 01639 686149), so that they may provide proactive advice to seek to address any identified biodiversity issues at the earliest stage of your project / design.

As this site has been partly looked at previously, the following specific comments can be confidently added to this response, and would be required with the submission of any application;

- An updated Extended Phase 1 habitat survey, this should include the identification of the presence of S7 Environment (Wales) Act (S42 NERC Act 2006)/ LBAP habitats and species, sites that meet SINC criteria, in addition to protected species. A balance of S7/LBAP/SINC habitat loss/gain to the scheme should be included. The surveys should cover all areas that may be impacted by the scheme. The results of this survey should inform the requirement for further more specific surveys, such as bird surveys, reptile surveys. The site is close to Eaglesbush Valley LNR; this will need to be appropriately assessed. The survey should also double check if any badger activity is evident on site and if reptiles are present.
- Bat Survey.

- There are habitats on site that will support birds therefore it is also recommended that a breeding bird survey is undertaken.
- A biodiversity record search from the South East Wales Biodiversity Records Centre (SEWBRc) should be undertaken to inform the required surveys and the assessment.
- An assessment of the impacts upon areas identified as sites of importance for nature conservation (SINC) and all areas that would meet the criteria of a SINC. NB details of identified SINCs are available from SEWBRc and the criteria are available from the Wales Biodiversity Partnership website.
- An assessment of ecosystem resilience (Section 2 Environment (Wales) Act 2016); this shall particularly consider:
 - (a) *diversity between and within ecosystems;*
 - (b) *the connections between and within ecosystems;*
 - (c) *the scale of ecosystems;*
 - (d) *the condition of ecosystems (including their structure and functioning);*
 - (e) *the adaptability of ecosystems.*
- An assessment of impacts upon bird habitat (Section 9a Conservation of Habitats and Species Regulations 2010 as amended); this should ideally be based on up to date survey information (including breeding, foraging and wintering requirements).
- Details of biodiversity enhancement measures.

Proposals for mitigation/compensation for any adverse impacts identified in the above assessments.

Archaeology

Glamorgan Gwent Archaeological Trust (GGAT) advises that to ensure that all aspects of the development that will have an impact on the archaeological resource are identified, that appropriate archaeological work is undertaken to lessen this impact. Therefore, if consent were forthcoming it would be subject to a condition requiring a programme of archaeological work in accordance with a written scheme of investigation as there are likely to be features associated with the house and grounds within the development area, and information in the HER shows that there may be other features in the area.

Land Contamination

As the site falls within a land contamination buffer a Phase 1 preliminary risk assessment (desk study) will be required to accompany the planning application.

Coal

There are a number of coal mining features within the site. As such the site lies within a high risk coal mining area, and accordingly a mining report and risk assessment will be required. It is strongly recommended that you engage with pre application discussion with the coal Authority as mining features could potentially impact the layout of a development.

Drainage

It is noted that you have provided an indicative drainage scheme, however, this development will require SABS and as such will require a separate pre-application with the relevant approval body.

Please note that from 7th January 2019, all new developments of more than 1 house or where the construction area is of 100m² or more will require sustainable drainage - built in accordance with mandatory standards for sustainable drainage published by Welsh Ministers - to manage on-site surface water. More information is available in [Schedule 3 of the Flood & Water Management Act 2010](#).

These systems must be approved by the Council's Engineering Service acting in its SuDS Approving Body (SAB) role **before construction work begins**. In this respect it is essential that a developer of any such project gain SAB approval of its surface water drainage alongside any relevant planning permission. **You will not be allowed to start construction until both permissions have been approved.**

If you have not done so already, and your development would not fall into any of the relevant exceptions¹, you are therefore strongly encouraged to request further advice from the SAB. Involving the SAB Officers in pre-application discussions will allow for SuDS drainage matters (to ensure suitability of proposed SuDS design in line with national standards and adequate site layout) to be considered alongside the assessment of planning merits. **There is an additional charge of £250 for this service.** This can be as part of any agreed further pre-application submissions with the Planning Authority (recommended) or independently/ direct with the SAB. You are advised, however, that failing to engage in joint pre-application discussions has the potential to lead to delays and, most notably, the potential need to obtain further planning permission should any agreed SuDS design not be compliant with any relevant planning permission. Further details are available at www.npt.gov.uk/planning.

Prior to commencement of any works within a watercourse, permanent and temporary permission under Section 23 of the Land Drainage Act 1991 must be obtained from the Authority. You are therefore advised to contact the Development Management Engineer, Mr Justin Griffiths at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG (Tel.No.01639 686397 e-mail j.griffiths4@npt.gov.uk . Please note such consents can take up to 8 weeks to be processed after registration and early application is advised.

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¹ Exceptions and exemptions, in summary, relate to:-

- Existing sites and developments with planning permission granted or deemed to be granted (whether or not subject to any conditions as to a reserved matter) or for which a valid application has been received but not determined by 7 January 2019. However, SAB approval will still be required if the planning permission was granted subject to a condition as to a reserved matter and an application for approval of the reserved matter is not made before 7 January 2020.

Notwithstanding the necessary consent required under section 23 of the Land Drainage Act 1991. The applicant must note that any culverts/ditches/open watercourses that conveys water through their land are to remain free from obstruction at all times. All tributary watercourses (culverted or not) located within the applicants land would be riparian responsibilities whereby the responsibility to sustain the flow of watercourse would remain with the land owner and subsequently passed on to the respective landowners thereafter should the land be sold. For further information on riparian responsibilities please contact Mr Justin W. Griffiths Senior Engineer – Team Leader (Tel: 01639 686397 or email j.griffiths4@npt.gov.uk), alternatively you could access the riparian booklet online using the following web-link <https://www.npt.gov.uk/2867>

- There is a critical watercourse covering the Cryddan catchment area which is identified on the Councils GIS, and is located in the centre of the proposed development approximately. The Drainage Officer advises that the location of this watercourse has been difficult to identify but is essential to the development layout and needs to be factored into the design.
- Should any springs or ground water seepage be encountered the on site works in that area shall cease until a scheme for collection and disposal of the water has been submitted to and approved in writing by the Local Planning Authority. No ground water shall ever be discharged into the proposed drainage scheme.
- There must be no interference, alteration or diversion of any ditch, watercourse, stream or culvert crossing or bordering the site, without prior consultation and agreement with the Authority.
- Foul water and surface water discharges shall be drained separately from the site.
- No surface water or Land drainage run-off shall be allowed to connect, either directly or indirectly, to the public sewerage system.
- Adequate provision shall be made for the drainage of the site, to ensure that the drainage of any adjoining land is not interrupted or otherwise adversely effected by the development during the life time of construction.

You are encouraged to contact Natural Resources Wales (NRW) to seek further pre-application advice – see note below for details of their pre-application services.

You are encouraged to contact Dŵr Cymru Welsh Water (DCWW) to seek further pre-application advice – see note below for details of their pre-application services.

Major Developments

Please be aware that as a ‘major’ development there is now a statutory requirement (introduced by s17 of the Planning (Wales) Act 2015) for the applicant / developer to consult the community and relevant statutory consultees in advance of formal submission of an application.

Please note that a major application cannot be validated until such consultation is undertaken and a Pre-Application Consultation (PAC) Report submitted with the application.

Detailed advice on Pre-application Consultation can be found on the [Welsh Government website](#).

Please note that at this time there is specific guidance in relation to PAC under COVID-19 restrictions. If the process is not carried out in accordance with these procedures, the application will be invalid upon submission, and will need to be redone.

Section 106 Planning Obligations

The Council's approved [Planning Obligations Supplementary Planning Guidance](#) (SPG) provides the local policy basis for seeking planning obligations through Section 106 Agreements in Neath Port Talbot. The Council's approved SPG is also available to view/ download at www.npt.gov.uk/planning.

Following consideration of the proposed development and potential impacts and needs arising from the development, I would advise that the Council is likely to seek planning obligations covering the following: -

Affordable Housing - Policy AH1 requires affordable housing contributions from all qualifying new housing developments. The site is located within the Neath spatial area, which requires a 25 % of unit's contribution towards affordable housing on all developments over 3 units.

Education - The Local Authority's Education Department has not yet responded to this pre application enquiry with regards to whether there are any capacity issues within the catchment of this site. Their response will be forwarded once received.

Public Open Space - Policy OS1 states where there is a quantitative deficiency in outdoor sport, children's play, informal space or allotments, provision will be sought, including the requirement for maintenance in conjunction with all new residential developments of 3 or more dwellings, based on the following standards:

Open Space Standard

Outdoor Sport 1.6 hectares per 1,000 population

Children's Play 0.25 hectares per 1,000 population

Informal Space 0.55 hectares per 1,000 population

Allotments 0.19 hectares per 1,000 population

The site lies within the Neath East Ward where there is a shortfall in all categories of open space except informal. There is also a shortfall in allotment availability in the ward.

The development proposal would have the following open space requirements:

	A	B	C	D	E	F	G
19							
20							
21							
	LDP Policy OS 1 Categorisation	Total Development Proposal Open Space Requirement	Open Space Cost	Cost Per Dwelling	Housing Units	Scheme Total Cost	
22							
23							
24	Area	sq m	sq m				
25							
26	OUTDOOR SPORT-PITCH	1,396	£10.80	£284	53	£15,052	
27	OUTDOOR SPORT-NON PITCH	546	£100.00	£1,030	53	£54,590	
28	DESIGNATED PLAY SPACE	303	£150.00	£855	41	£35,055	
29	INFORMAL SPACE	668	£5.00	£63	53	£3,339	
30	ALLOTMENTS	231	£10.90	£48	53	£2,544	
31							
32	TOTALS	3,143		£2,280		£110,580	
33							

The calculations are based on no on-site open space provision , and based on this, the site would require £110,580 of S106 contributions for open space to meet the Policy requirement. If there is to be on site open space the S106 calculation for the relevant category can be reduced to take that in account. The cost/ sqm of each category is detailed in the SPG and also in the attached spreadsheet. For example, if 50sqm of Informal open space is provided on site, at a cost of £5.00 per square metre the S106 costs could be reduced by £250.

Public Transport Contribution: this may be required, you are encouraged to liaise with the bus provider on this matter.

Biodiversity You may need to put forward proposals for mitigation/compensation for any adverse impacts identified within the ecological assessment

Further discussion on such matters can, of course, be entered into at the time of an application, or as part of any agreed further pre-application submissions.

Required Supporting Documentation

We would encourage you to submit your application electronically via www.gov.wales/planningapplications.

Having regard to the nature of your proposal, it is considered at this stage that in addition to the submission of standard mandatory supporting documentation such as application forms, plans and fee, any application for the above development should also be accompanied by the following additional documentation: -

- Pre-Application Consultation (PAC) Report ('Major' development)
- Design and Access Statement (see TAN 12 Design, Appendix 1)
- Phase 1 Habitat Survey / Bat Survey / Barn Owl Survey and other biodiversity reports and assessment as set out previously within this reply.
- Tree Survey
- Archaeological Study / Evaluation (noting the reply from GGAT)
- Contaminated Land Desk-top Assessment
- Construction Management Plan
- Site survey identifying existing ground levels, plus details of proposed levels including

sections / cross-sections

- Structural calculations for any retaining features.
- Coal Mining Risk Assessment
- Waste Management Plan (Policy W3)
- Transport Statement.
- Lighting Scheme
- Streetscene elevations
- Details of any S106 contributions

If any subsequent application fails to include the information above, there is a chance it may not be registered and, in any event, it is likely that an application will either be refused or will not be able to be progressed until its satisfactory submission.

It is also this Authority's practice to recommend to applicants that detailed information is submitted at application stage to ensure that, in the event of planning permission being granted, that 'pre-commencement' conditions (which require approval of details prior to work starting on site) can be minimised. You are therefore encouraged to ensure that your initial submissions incorporate as much information as possible (for example materials, boundary treatment, ecology mitigation, Construction Management Plan, Travel Plan etc.), and address all matters raised in the advice given above.

Detailed guidance on the use of the national standard application form for planning permission and other associated consent regimes; and the information which must accompany a planning application so that the local planning authority can determine the validity of the application, can be found as follows: -

“Guidance on the use of the standard application form ('1app') and validation of applications”:

<http://wales.gov.uk/topics/planning/policy/guidanceandleaflets/1appguidance>

The Town and Country Planning (Development Management Procedure)(Wales) Order 2012:

[http://www.legislation.gov.uk/wsi/2012/801/contents/made \(original Order\).](http://www.legislation.gov.uk/wsi/2012/801/contents/made (original Order).)

(Note subsequent Amendment Orders: [2014](#) ; [2015](#) ; [2016](#) ; and [2017](#)).

How we will deal with your planning application

As part of its emphasis on 'Delivering Quality Development Quickly', the Planning department prides itself on the service it offers our customers. Once your application has been received, this will include an allocated case officer making contact with you or your appointed agent within the first week and arranging a visit, following which we will contact you by phone or email to advise of any discrepancies with your application. We will also work with you to address any outstanding concerns, including any amendments required to make your proposal acceptable.

Once we are happy with the validity of your application, we will formally consult neighbours and relevant consultees. Provided there are no significant matters of concern resulting from such consultations, we will then seek to determine your application as swiftly as possible after the expiry of the statutory publicity period, and aim to do so within the 8 week statutory period.

While Officers will endeavour to ensure you are aware of the progress of your application, we would

encourage you to contact the case officer should you wish to discuss any matter further.

Development Team Approach – Building Control

The Development Management and Building Control teams work closely to assist developers in improving the quality of their development and ensuring compliance with all appropriate conditions and Regulations. In particular, Building Control provide a competitive and highly professional service and seek to actively engage with developer's at the earliest stage of their project. You are therefore encouraged to contact the Building Control team on 01639 686820 or by emailing building.control@npt.gov.uk to enter into early negotiations and understand the benefits of the Council's Development Team approach.

Requests for Further Advice

Following receipt of this initial advice, should you wish to discuss your scheme prior to formal submission, please contact the case officer on the direct number or email address given above. Further charges may apply.

Yours faithfully

Helen Bowen

If you require this information in larger print, or in an alternative format, please contact the above named officer.

Seeking Pre-Application Advice from External Consultees

Natural Resources Wales (NRW)

Natural Resources Wales has a key role in the planning system and you may wish to hold pre-application consultation with them, utilising their pre-application service, so that environmental considerations are identified and addressed at the earliest opportunity. More information about Natural Resources Wales's pre-application service, including what advice can be sought for free, and what advice is subject to a fee can be found at:

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/?lang=en>

Dŵr Cymru Welsh Water (DCWW)

Dŵr Cymru Welsh Water has a key role to play in the development and planning process as the services provided are at the forefront of public health and protection of the environment. Dŵr Cymru encourages all developers to engage with them as early as possible in order to address any issues that may arise during the planning/construction process.

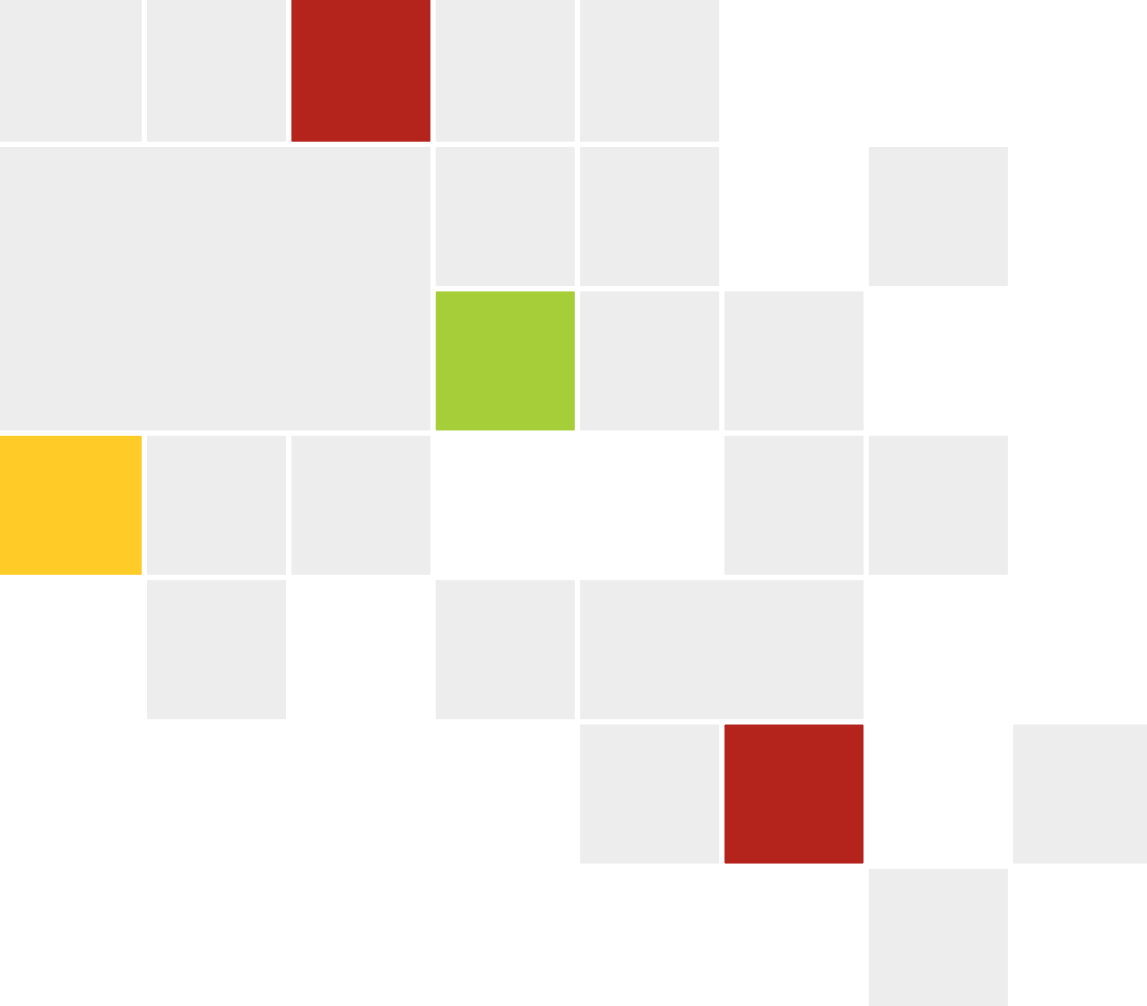
To assist, Dŵr Cymru operates a pre-planning service in order to assess the impact of the proposed development. A written response will be provided advising whether the local network(s) can support the proposal, whether off-site water mains and/or sewers will need to be provided, and whether there are any apparatus located within the land you wish to develop and the requirements for these apparatus. This service is provided for a fee of £155+ VAT and can be submitted by post or by completing the online enquiry form at <http://www.dwrcymru.com/en/Developer-Services>. Further information can be obtained from the dedicated team of planning officers on 0800 917 2652.

Coal Authority

In line with many other statutory consultees, the Coal Authority no longer provides responses to pre-application enquiries without a charge. The Coal Authority therefore requests LPAs to direct applicants that are seeking pre-application advice regarding coal mining legacy issues because their site falls within the Development High Risk Area to them, so they may provide a quotation for providing advice.

Should only a small part of your site fall within the High Risk area, we would especially encourage you to engage with the Coal Authority, since they may advise in certain situations that a Coal Mining Risk Assessment is not required.

Further advice may be found at: <https://www.gov.uk/government/organisations/the-coal-authority>



Boyer

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