



PLANNING, DESIGN AND ACCESS STATEMENT

In respect of:

**RESERVED MATTERS SUBMISSION –
RESIDENTIAL DEVELOPMENT
LAND AT FORGE WASHERY, LOWER
BRYNAMMAN, NEATH PORT TALBOT,
SA18 1SW**

On behalf of:

Tolkein Property Ltd.

Ref: 2020.a

May 2021

JCR Planning Ltd.

PLANNING • DEVELOPMENT

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development industry**

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1.0 INTRODUCTION

1.0.1 This planning, design and access statement (PDAS) has been prepared by JCR Planning Ltd. on behalf of Tolkein Property Ltd. ('the Applicant') in support of a reserved matters submission for the construction of 30 no. dwellings at the Forge Washery, Brynamman.

1.0.2 The scheme has been sensitively designed and based on a full understanding of the site and its spatial context. This statement should therefore be considered alongside the following drawings:-

• LOCATION PLAN	-	LOCPL2020.A
• SITE LAYOUT	-	GENPL1A
• LANDSCAPING	-	LANDSCAPE1A
• TOPOGRAPHICAL SURVEY	-	TOPO 001A
• TOPOGRAPHICAL SURVEY	-	TOPO 001B
• SITE SECTIONS (1 OF 2)	-	SECT1A
• SITE SECTIONS (2 OF 2)	-	SECT1B
• BRYNAMAN DRAINAGE A1 301	-	2104.301
• BRYNAMAN DRAINAGE A1 302	-	2104.302
• DWELLING TYPE A 'AMAN'	-	A2TYPEA.01A
• DWELLING TYPE B 'BRYN'	-	A2TYPEB.01B
• DWELLING TYPE C 'GARW'	-	A2TYPEC.01C
• DWELLING TYPE A 'OLCHFA'	-	A2TYPED.01D
• DWELLING TYPE E 'ISAF'	-	A2TYPEE.01E
• TREE ASSESSMENT	-	TREE01A

1.0.3 This PDAS therefore forms part of the reserved matters submission to be considered by the Local Planning Authority and provides supporting information.

1.0.4 In summary, the proposed scheme is an appropriate response to a unique opportunity to redevelop this brownfield site in a highly sustainable location and is fully policy compliant.

2.0 THE SITE

2.0.1 The site is situated to the east of Lower Brynamman, within the Neath Port Talbot County Borough Council (NPTCBC) authority area.

2.0.2 The site, referred to as ‘Pentre Efail’ (Forge Village), is irregular in outline. It is approximately 2.23 hectares in area, with maximum dimensions of 280 metres by 120 metres, and is relatively level. An aerial photograph of the site and its surroundings is provided at *Figure 1*. The full extent of the site is shown in the accompanying drawings.

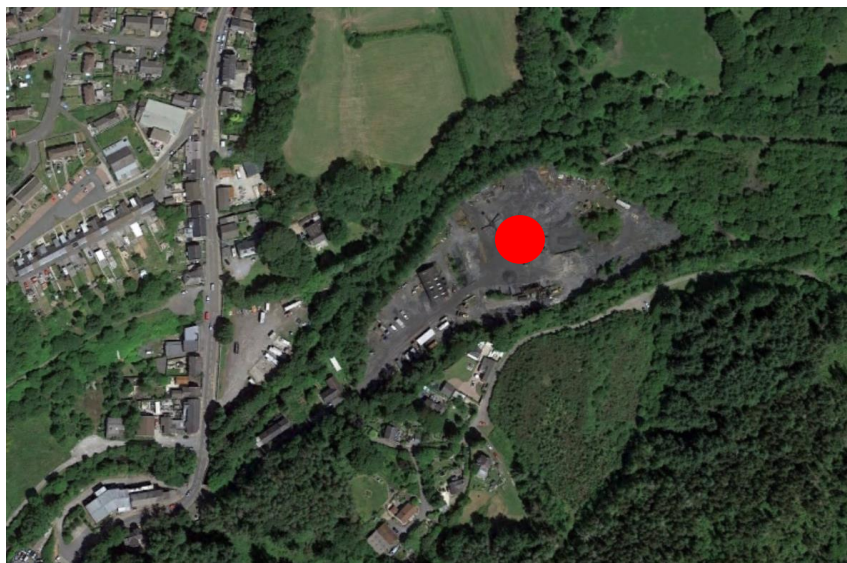


Fig. 1 - General aerial view of Pentre Efail site and surroundings

2.0.3 To the north of the site is the River Amman, which delineates the boundary with the neighbouring local authority, Carmarthenshire County Council. The southern boundary comprises a wooded area known as Cwm Amman and to the west of the site is Station Road (A4069).

2.0.4 The site is accessed from the A4069, the main road through Lower and Upper Brynamman, along a track which serves as vehicular access to both the application site and a small cluster of residential properties. Adjacent to the site's southern and western boundaries are a number of residential dwellings, approximately six to the south and five to the west. The details of the upgrading works to this access were approved under the reference of application no. P2017/0445.

- 2.0.5 The site was historically occupied by the Amman Ironworks in the first half of the 19th century and latterly by a brickworks. The original structures have largely been removed and this brownfield site is now dominated by areas of hard standing and remnant spoil workings.
- 2.0.6 Currently, a coal depot and washing yard is operational on the site but is slowly being dismantled. In terms of physical development, the site accommodates portable site offices, a former weighbridge, a large shed (garage), and a number of small outbuildings.
- 2.0.7 The current use of the site mainly falls within Class B2 of the Town and Country Planning (Use Classes) Order 1987. The current land use involves processes or undertakings that have potential to result in noise, as well as emissions in the form of dust and fumes.
- 2.0.8 The land to the south and east of the site is set higher than the site itself. Ground levels across the site range from 51 m AOD at the east to a minimum level of 46 m AOD in the west, close to the point of access to the site.
- 2.0.9 Built into the northern facing slope of the site is a furnace bank relating to the historical industrial operations carried out at the site. This is a Grade II listed structure (listing no. 26,818).
- 2.0.10 A previous ecology report, prepared in July 2005, noted the following features - native and non-native trees growing on top of the bund around the periphery of the site. Overall, the main body of the site was considered to be of little ecological value and therefore no constraints to development have been identified.

2.1 SURROUNDING AREA

- 2.1.1 The River Amman runs along the site's northern boundary, whilst a wooded area (Cwm Aman) lies to the south and the main A4069 highway (Station Road) is to the west, from which the site is accessed.

- 2.1.2 As documented in an archaeological desk-based assessment undertaken by Cambria Archaeology (January 2002), the two buildings (thought to have been a company shop and an office) originally associated with the operational function of the site as an ironworks, are situated outside the application site boundary, and are now occupied for residential use.
- 2.1.3 The residential dwellings to the south of the site are understood to fall within the margins of Castell Farm. These dwellings are located outside the LDP settlement boundary. The dwellings to the west of the site are within the settlement boundary of Lower Brynamman.
- 2.1.4 A footpath abuts the site boundary (adjacent to but outside) and follows a similar alignment to the River Amman. The footpath crosses the river via a footbridge to the north of the site.
- 2.1.5 Lower Brynamman is closely related to Brynamman which is located to the north of River Amman. Brynamman falls within Carmarthenshire County Council's administrative area. However, for all intents and purposes, despite being located within NPTCBC the settlement of Lower Brynamman is considered to function as a Carmarthenshire settlement.
- 2.1.6 Brynamman provides a range of services and facilities, including a primary school, places of worship, public hall, public houses, retail outlets and cinema. The site is situated within convenient walking distance of the settlement's services and facilities.
- 2.1.7 Both Brynamman and Lower Brynamman are well served by public transport. There are bus stops within a short walk of the site's access, with regular services linking Lower Brynamman with several nearby settlements, including Ammanford to the west (124) with its wide range of services and facilities, and further afield to Swansea (X26).
- 2.1.8 Lower Brynamman has a coal mining heritage, as do the majority of settlements in this locality, and there is a strong sense of community, to which the relatively high proportion of Welsh speakers contributes significantly. The settlement is typical of a

West Wales village community that has seen a decline in primary industry and manufacturing, and is now reliant on service industries, largely located elsewhere.

2.1.9 The Brecon Beacons National Park is located to the north and west of the site, being a distance of approximately 0.85km at its closest point. The Amman Valley Cycle Way runs adjacent to the site's boundary following the line of the River Amman.

2.1.10 The submitted proposal has given careful consideration to the character and appearance of the site, a fact reflected in the overall layout, which both reflects and assists in lifting the visual quality of the site's locality.

3.0 PLANNING HISTORY

3.0.1 The site as a whole has a varied planning history, principally based around the existing uses of the site. The applications of principal significance to this statement, over the last 20 years or so, are detailed below:-

- 1977/126 Erection of coal washing and grading plant and associated bunkers – Approved 24/6/77
- 1982/212 Renewal of consent for coal washing and grading plant bunkers, storage ponds and buildings – Approved 23/7/82
- 1987/212 Renewal of consent for coal washing and grading plant and offices – Approved 15/9/87
- P2008/0798 Outline application for residential development and alterations to existing access - Approved 25/8/2016
- 2017/0007 Outline application for residential development and alterations to existing access – Appeal against conditions – Upheld APP/Y6930/A/17/3170318
- P2017/0445 Variation of Condition 6 (access arrangements) to allow reduction in carriageway width and provision of larger footway of planning permission P2008/0798 - Upheld at appeal APP/Y6930/A/18/3194251

3.0.2 The planning history of the site outlined above relates mainly to the operational undertakings of the various mineral business operations at the site, and more latterly residential development. There are therefore previous planning applications of significant relevance to this submission.

3.0.3 The Inspector's decision in respect of the recent Appeal (APP/Y6930/A/18/3194251 refers) imposed the following conditions:-

Schedule of Conditions

1.	Details of the appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.	General - <i>Compliance</i>
2.	Any application for approval of the reserved matters shall be made to the local planning authority not later than three years from the date of this permission.	Time constraint - <i>Compliance</i>

3.	The development shall begin either before the expiration of five years from the date of this permission or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.	Time constraint – <i>to be complied with</i>
4.	The development shall be carried out in accordance with the following plans and documents: • Location Plan (SAV1) • Red and blue line plan (SAV 2) • Revised Access Proposal- General arrangement –VC8596.00, R6, Sheet No. 03 • Revised access proposal boundary plan – VC8596.00, R2, Sheet No. 05 • Revised access proposal cross section- VC8596.00, R4, Sheet No. 06 • Extent of Works - CSA95SK03 • Environmental Report -Blandford Consulting (June 2005) • Welsh Language Impact Assessment (Oct 2008) • Letter dated July 13th 2016 from Geraint John detailing Welsh Language mitigation. • Viability Report - Savills (Feb 2011) • Stage 1 Road Safety Audit (July 2017) • Foundation and Highway Construction Appraisal - Austin Partnership (17/4/13) • Access Statement - Savills (May 2008) • Planning Statement - Savills (May 2008) • Flood Consequences Assessment (Oct 2015) • Archaeology Assessment and Site Visit - Archaeology Wales - Dec 2013 • Archaeology Evaluation - Archaeology Wales Sept 2014	<i>Compliance</i>
5.	As part of the submission of the first reserved matters application full details of the existing and proposed ground levels across the whole of the site shall be submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall ensure that the ground levels are raised to the maximum water level identified in the Flood Consequences Assessment (FCA) which accompanies the application. The development shall be carried out in accordance with the approved details.	<i>Compliance – see accompanying sections drawing</i>
6.	As part of the first reserved matters application full details of the proposed open space provision at the site, including details of the timing of such provision, shall be submitted to and approved in writing by the Local Planning Authority, and the public open space shall thereafter be provided and retained in accordance with the agreed details.	<i>Compliance – see accompanying landscaping drawing</i>
7.	As part of the first reserved matters application, full details of hard and soft landscaping schemes for the landscaping of all public landscape areas, other than small privately owned domestic gardens, shall be submitted to and approved in writing by the Local Planning Authority. The submitted planting schemes shall include: i. indications of all existing trees and hedgerows on the land, and details of any to be retained, taking into account potential growth, together with measures for their protection in the course of development;	<i>Compliance – see accompanying landscaping drawing</i>

	ii. a statement setting out the design objectives and how these will be delivered; iii. hard surfacing materials and designs; iv. details of the design and location of minor artefacts and structures including street furniture, public refuse bins, highway grit bins for development access road and footpaths; v. planting schemes including species, planting densities and sizes at time of planting, including wildlife friendly species and those that will promote habitat creation. The approved landscaping schemes shall be fully implemented within the first planting season following completion of the development, any trees or plants which within a period of five years from the completion of the residential development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and the same species, unless the Local Planning Authority gives written consent to any variation.	
8.	As part of the submission of the first reserved matters application details of a Landscape Management Plan, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas including highway verge areas and public open spaces other than privately owned domestic gardens, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of any of the dwellings on the site. The landscape management plan shall be carried out as approved.	<i>Compliance – see accompanying LMP</i>
9.	As part of the first reserved matters application a scheme to address the impacts upon the Welsh Language shall be submitted to and approved in writing by the Local Planning Authority. The details shall be based upon the recommendations set out in the letter from GJ Planning dated 13th July 2016. The scheme as approved shall be fully implemented prior to the first beneficial use of any dwelling, or any other timeframe as approved as part of the scheme.	<i>Compliance – see accompanying WLAP</i>
10.	No development approved by this permission shall commence until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which shall be submitted by the applicant and approved by the Local Planning Authority. The programme and scheme shall be fully implemented as defined in the approved details.	<i>Pre-commencement – to be complied with</i>
11.	No development shall commence on site, including vegetation or debris clearance works, until a method statement for the protection of reptiles has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.	<i>Pre-commencement – to be complied with</i>
12.	As part of the first reserved matters application a scheme which makes provision for a cycleway linking the application site to the existing footbridge shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to the first beneficial use of any dwelling, or any other timeframe as approved as part of the scheme.	<i>Compliance – see accompanying landscaping drawing</i>

13.	Prior to the commencement of work on site a scheme to assess the nature and extent of any contamination on the site, and confirmation of whether or not it originates on the site shall be submitted to and agreed in writing with the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons in accordance with the following document:- Land Contamination: A Guide for Developers (WLGA, WAG & EAW, July 2006) and shall be submitted as a written report which shall include: i. A desk top study to identify all previous uses at the site and potential contaminants associated with those uses and the impacts from those contaminants on land and controlled waters. The desk study shall establish a 'conceptual site model' (CSM) identifying all plausible pollutant linkages to be assessed. ii. a survey of the extent, scale and nature of contamination; iii. an assessment of the potential risks to: • human health, • ground waters and surface waters • adjoining land, • property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes, • ecological systems, • archaeological sites and ancient monuments; iv. an appraisal of remedial options, and proposal of the preferred remedial option(s).	Pre-commencement – <i>to be complied with</i>
14.	Prior to the commencement of work on site a remediation scheme to bring the site to a condition suitable for the intended use by removing any unacceptable risks to human health, buildings, other property and the natural and historical environment shall be prepared and submitted to and agreed in writing with the Local Planning Authority. The scheme shall include all works to be undertaken, proposed remediation objectives, remediation criteria and site management procedures. The measures proposed within the remediation scheme shall be implemented in accordance with an agreed programme of works.	Pre-commencement – <i>to be complied with</i>
15.	Prior to first beneficial occupation of any dwelling hereby permitted, a verification report which demonstrates the effectiveness of the agreed remediation works carried out in accordance with condition 14 shall be submitted to and agreed in writing with the Local Planning Authority.	Pre-occupation – <i>to be complied with</i>
16.	Prior to first beneficial occupation of any dwelling hereby permitted, artificial nesting sites for birds within the site/on the buildings shall be provided in accordance with a scheme which shall first have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall thereafter be retained on site.	Pre-occupation – <i>to be complied with</i>
17.	Prior to the first occupation of any dwelling the access road shall be constructed to base course level (and the footpath to wearing course) including details of drainage, street lighting and signage in accordance with a scheme which has first been submitted to and approved in writing by the Local Planning Authority. Prior to the first occupation of the final dwelling the road shall be finished to wearing course.	Pre-occupation – <i>to be complied with</i>

18.	Prior to commencement of any works at the junction a Stage 2 Road Safety Audit for the works to the junction shall be submitted to and approved in writing by the Local Planning Authority, and any items raised in the approved stage 2 Road Safety Audit shall be fully implemented on site as part of the junction improvement works. On completion of the approved junction works a stage 3 Road Safety Audit shall be undertaken in accordance with the Design Manual for Roads and Bridges Volume 5, Section 2, Part 2, HD 19/15, the findings together with proposed schedule of works shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be fully implemented on site prior to the occupation of the first approved dwelling. In accordance with the Design Manual for Roads and Bridges Volume 5, Section 2, Part 2, HD 19/15 and within 12 months from the date of the occupation of the first dwelling a Stage 4 Road Safety Audit shall be undertaken and any matters raised to be undertaken on site shall be submitted to and approved in writing by the Local Planning Authority. An approved works shall be fully implemented on site prior to the expiry of 3 months from the date of the approval of the Stage 4 Road Safety Audit details.	Pre-commencement – to be complied with
19.	As part of the first reserved matters application a scheme for the comprehensive and integrated drainage of the site showing how foul water, surface water and land drainage will be dealt with, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be informed by an assessment which shall be carried out of the site potential for disposing of surface water by means of a sustainable drainage system, with the results of the assessment provided to the Local Planning Authority. Where a sustainable drainage scheme is to be provided, the submitted details shall: i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters; ii. include a period for its implementation; and iii. provide a management and maintenance plan of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. The scheme as agreed shall be fully implemented prior to the first beneficial use of the development.	Compliance – see drainage drawings prepared by ‘Francis Sant’ engineers
20.	No development shall commence, including any works of demolition, until a Construction Method Statement has been submitted to and approved in writing by the local planning Authority. The approved statement shall be adhered to throughout the construction period. The statement shall provide for: i. the parking of vehicles of site operatives and visitors ii. loading and unloading of plant and materials, and the routing of construction and delivery vehicles iii. storage of plant and materials used in constructing the development	Pre-commencement – to be complied with

	iv. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate v. wheel washing facilities vi. measures to control the emission of dust and dirt during construction vii. a scheme for recycling/disposing of waste resulting from demolition and construction works viii. scheme for the erection of temporary/semi temporary signage warning drivers of the presence of children and speed restrictions ix. a demolition method statement including mitigation measures to minimise the impacts of the demolition upon noise and nuisance to adjoining properties. The approved statement, schemes and mitigation shall be adhered to throughout the demolition and construction period of the development.	
21.	There must be no interference, alteration or diversion of any ditch, watercourse, stream or culvert crossing or bordering the site. Any drainage pipe, highway drain or highway run-off entering, crossing or discharging into the development site must be accommodated into the site development works by the developer. No buildings shall be erected over or within the safety zone of any culvert or watercourse.	<i>Compliance – see accompanying site layout drawing</i>
22.	A 7 metre vegetated buffer zone shall be maintained between the development and the riverbank, within which, other than for the construction of the cycle link required by condition 12, no development or vegetation clearance shall take place.	<i>Compliance – see accompanying landscaping drawing</i>
23.	Foul water and surface water discharges must be drained separately from the site.	<i>Compliance – see drainage drawings prepared by ‘Francis Sant’ engineers</i>
24.	No surface water and land drainage run-off shall be allowed to connect/discharge (either directly or indirectly) to the public sewerage system.	<i>Compliance – see drainage drawings prepared by ‘Francis Sant’ engineers</i>
25.	Notwithstanding the information shown on the approved drawings the existing minor junction leading to Cwm Amman Farm onto the access road shall have a minimum visibility splay of 2.4m x 33m in either direction. This splay shall be constructed as such prior to any other work commencing on site.	<i>Pre-commencement – to be complied with</i>
26.	Prior to the commencement of development a scheme of traffic calming measures shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to the first occupation of the first dwelling to be completed.	<i>Pre-commencement – to be complied with</i>
27.	Notwithstanding the information shown on the approved drawings the narrowest section of the road shall provide a minimum carriageway width of 5m in accordance with detailed drawings which shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development. The work shall be undertaken in accordance with those approved details.	<i>Pre-commencement – to be complied with</i>

4.0 PROPOSED DEVELOPMENT

- 4.0.1 The proposal seeks approval for those matters reserved – appearance, landscaping, layout and scale – following the granting of outline planning permission at appeal on the 1st June 2018 (APP/Y6930/A/18/3194251 refers).
- 4.0.2 The Applicant aims to redevelop this brownfield site with the vision of creating high quality residential accommodation that is readily assimilated within the local townscape, without causing any visual detriment.
- 4.0.3 The proposed scheme introduces significant visual improvements to the built environment that will enhance the character of Lower Brynamman.
- 4.0.4 The scheme encompasses an holistic approach to the planning and design of the development, which significantly improves the area's potential to create a high quality development that will promote prosperity, health, happiness and well-being.



Fig. 2 – Proposed site layout

- 4.0.5 The development proposes 30 no. dwellings, comprising 26 detached and 2 no. pairs of semi-detached. It is evident from the accompanying drawings that the 2.23 hectare brownfield site is capable of accommodating the proposed number of dwellings and associated parking, amenity areas and open space provision, etc., without detriment to any known acknowledged amenity interest.
- 4.0.6 In more detail, the five dwelling types proposed are:-
- Aman - 6 no. detached, 2 storey, 2 bedroom
 - Bryn - 7 no. detached, 2 storey, 3 bedroom
 - Garw - 4 no. semi-detached, 2 storey, 3 bedroom
 - Olchfa - 9 no. detached, 2 storey, 4 bedroom
 - Isaf - 4 no. detached, 2 storey, 4 bedroom
- 4.0.7 It is anticipated that the development will provide accommodation for 30 no. households, which equates to between 60 and 70 persons. For the purposes of this report, a figure of 65 persons is considered representative. However, pre-judging the number and type of households that will occupy a proposed development is fraught with difficulty. The most robust way of evaluating potential occupancy characteristics is simply by applying the average household size figure to each proposed dwelling.
- 4.0.8 Given the size of the dwellings, the expected occupation will be by families, as opposed to retired couples or single persons. Applying the average household size of 2.4 persons, it is anticipated that there will be at least twelve children living within the thirty dwellings.
- 4.0.9 The anticipated impact on existing services is likely to be positive, in the sense that the expected number of children will not result in an excessive burden being placed on local schools. Likewise, it is not thought that the anticipated number of adults will place undue demand on health services, given their anticipated average age.
- 4.0.10 The submitted scheme relates to the provision of 30 no. dwellings but does also include informal grassed areas of open space and makes provision for improved access to the adjacent Amman Valley Cycleway. Provision is also made for the retention of the archaeological kiln features with appropriate landscaping of these locally significant assets.

- 4.0.11 Access to the site is via the existing access from the A4069 which previously served the washery. Each dwelling is served by individual driveways direct from the estate road, with sufficient parking provision.
- 4.0.12 Although the site lies outside the settlement limits for Lower Brynamman, as defined in the LDP, the principle of residential development at this location is established by the granting of outline planning permission. Furthermore, the redevelopment and regeneration of this key brownfield site is supported by both national and local planning policy and will bring a previously community significant site back to efficient and beneficial use.
- 4.0.13 The development proposal also includes previously approved improvements to the access road and the junction with the A4069 Station Road, as well as a new length a footpath along the north-western edge of the access road.
- 4.0.14 It has previously been accepted, that the redevelopment of the site will allow significant environmental enhancements to be introduced, thus benefitting the surrounding area.
- 4.0.15 The low visual quality of the site is pronounced and it is essential that its sensitive redevelopment for housing will present the opportunity to assimilate this site into the surrounding landscape. It is noted that the site is not valued for any inherent landscape quality and as such, is not constrained by any particular landscape designation.
- 4.0.16 The site's redevelopment will result in the following benefits:-
- redevelopment (and more efficient use) of a conflicting land use brownfield site, which is encouraged by both national and local planning policy guidance
 - an opportunity to improve and maintain the local community, thereby positively addressing the issue of population decline, through the provision of homes for local people, thus benefitting existing local services and facilities and the Welsh language
 - the end of a 'bad neighbour' development as currently undertaken at the site and its replacement with a more appropriate residential land use

- prevent an intensification of the current industrial use which could quite lawfully occur under the current permitted parameters at the site
- the site's redevelopment was initially supported by the majority of the adjacent existing residents
- the site and its general environs exhibit the characteristics of an urbanised area, as evidenced by a 'cluster' of residential dwellings to the south, the industrial character of the site itself, the relative degree of 'closure' in landscape terms, and by virtue of its position, i.e. immediately abutting the eastern edge of the settlement boundary
- improved access to the site and reduction of vehicle and pedestrian conflict through the removal of HGV movements associated with the site's current operational function
- highway improvements will facilitate improved pedestrian and vehicular linkages between the site and surrounding area, to include the nearby centres of Lower Brynamman and Brynamman, for both existing and new residents
- will allow the restoration and maintenance of a listed structure providing historic interest to the local community
- will not adversely affect any third party land and flood risks associated with the local fluvial regime are considered negligible.

4.0.17 Finally, and perhaps of utmost importance, are the economic benefits that the proposed residential development will bring to the Upper Amman Valley communities. Poor market conditions and a lack of confidence has constantly prevented investment in this area and few housebuilders are prepared to commit to the construction of dwellings in such an uncertain market. The proposed scheme is regarded as a potential catalyst for other development to take place in the locality.

4.0.18 Overall, it is considered, that due to the limited scale of the development, there will be no negative impact on the community of Lower Brynamman.

4.0.19 Considered within the context of 'placemaking', the submitted scheme contributes both to a contextual and functional relationship with its wider surroundings and will also add to the social, economic, environmental and cultural value of the area.

4.0.20 The following information provides an overview of the scheme and should be read in conjunction with the accompanying drawings.

General Siting

4.0.21 The design approach for the scheme has been influenced by the site's parameters, alignment, and the need to accommodate certain features of local significance whilst also providing generous areas of open space.

Scale

4.0.22 The proposal is for 30 no. dwellings, comprising 6 no. two bedroom, 11 no. three bedroom, and 13 no. four bedroom properties.

External Finishes

4.0.23 The external appearance of the dwellings has drawn on the materials palette of the locality. The proposed scheme generally comprises smooth render, facing brick ('red' and 'blue') with decorative plinths and quoins, and slate roofs. Windows and doors are PVCu.

Drainage

4.0.24 All foul water will be disposed of via connection to the existing public sewer network. Detailed drainage design has been prepared by Francis Sant Engineers as part of this reserved matters submission and is included in this submission.

4.0.25 Surface water is to be intercepted via a sustainable drainage system, with overflow water being discharged at a controlled rate to the river. Several online attenuation features are included within the scheme.

Parking

4.0.26 A minimum 3 no. parking spaces are provided per dwelling.

Landscaping

4.0.27 A detailed landscaping scheme has been prepared and included as part of this reserved matters submission. Boundary treatments will be as existing and supplemented as and where necessary.

Environmental Enhancement

4.0.28 A number of measures are included within the proposal which will enhance the biodiversity in the area. The scheme is to incorporate the following:-

- areas of public open space
- hedgerow planting
- wildflower seeding
- tree planting (pioneer species to create a wooded area)
- 5 no. hibernacular

4.0.29 External lighting will be kept to a minimum and will be carefully located in order to avoid illuminating any potential bat habitat in the area.

4.0.30 It is evident that the scheme will make a positive contribution to the locality's character and appearance and will certainly not result in any harm. The proposal, as submitted, has taken full account of the site and its setting, as well as the incorporation of existing features of local significance, and for these reasons, should be supported.

5.0 PLANNING POLICY

5.0.1 Planning Policy Wales (PPW) (Edition 11, February 2021) is the latest update that sets out the direction of Welsh Government policy, with its holistic objective to accommodate both current and future societal needs. It is heavily linked to the newly released national development framework for Wales called ‘Future Wales: The National Plan 2040’ (February 2021). In accordance with Section 38 of the Planning and Compulsory Purchase Act 2004, the Future Wales document has become part of the development plan. Planning Policy Wales (Ed.11) (PPW) establishes the key principles for the planning system, whereas Future Wales (FW) applies the key principles of PPW and establishes where in Wales development should take place and how these places should grow and change.

5.0.2 Regrettably, the PPW document is silent on many day-to-day planning issues and instead focusses upon a number of nebulous paradigms and concepts.

5.0.3 The most dramatic change within PPW is the promotion and adherence to the socio-economic context provided by the ‘Well-being of Future Generations (Wales) Act 2015’ and thus aims to deliver a vision of Wales encompassing:-

- a more prosperous Wales
- a resilient Wales - which supports healthy, functioning ecosystems and recognises the limits of the global environment
- a healthier Wales
- a more equal Wales
- a Wales of more cohesive communities
- a Wales of vibrant culture, and
- a globally responsible Wales.

5.0.4 It is evident that PPW is now aiming to maximise the delivery of outcomes against all aspects of well-being and sustainable development by adopting the new and largely conceptual ‘placemaking’ approach.

5.0.5 The definition of ‘placemaking’ contained in PPW is:-

What is Placemaking?

“Placemaking” is 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.

Placemaking considers the context, function and relationships between a development site and its wider surroundings. This will be true for major developments creating new places as well as small developments created within a wider place.

Placemaking should not add additional cost to a development, but will require smart, multi-dimensional and innovative thinking to implement and should be considered at the earliest possible stage. Placemaking adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary and embed wider resilience into planning decisions.

Fig. 3 - PPW Definition of Placemaking

(PPW, p. 14)

5.0.6 In effect, trying to secure placemaking within the planning system, has become the main component in the delivery of all the aspirations within the ‘Well-being of Future Generations Act’, as well as placing a duty on public bodies to embrace and carry out sustainable development.

5.0.7 A more practical application of the placemaking concept comprises an understanding of the interrelationship between the following components:-



Fig. 4 - PPW Themes Collectively Contribute to Placemaking

(PPW, p. 20)

5.0.8 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.

5.0.9 ‘Sustainable development’ is defined as 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.

5.0.10 Refreshingly, PPW stipulates that:-

“It is not the function of the planning system to interfere with or inhibit competition between users of and investors in land”.

(PPW, para 1.19)

5.0.11 PPW sets out the manner in which placemaking will influence land use plan making, as well as development management decisions. The plan-led system is considered fundamental in underpinning the delivery of “sustainable places”.

5.0.12 An overall vision utilising five key principles has been adopted to support the change needed to embrace placemaking as a framework for the preparation and implementation of all development plans:-

- *Growing our economy in a sustainable manner;*
- *Making best use of resources;*
- *Facilitating accessible and healthy environments;*
- *Creating & sustaining communities; and*
- *Maximising environmental protection and limiting environmental impact.*

(PPW, Figure 5 and Annex B)

5.0.13 It is however accepted that not every development will be able to demonstrate full compliance with these principles, but that they still need to be considered in the development management process to see if a proposal can be improved or enhanced, in order to promote wider well-being. It is for developers and planning authorities to identify these opportunities.

5.0.14 Despite the weight given to conceptual policy, PPW does contain a number of more pragmatic guiding principles which are relevant to the submitted proposal:-

Preference for Previously Developed Land

Previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.

(PPW, para. 3.55)

Better Places through Design

Meeting the objectives of good design should be the aim of all those involved in the development process.

(PPW, para. 3.4)

Joint Working

Planning authorities should work with landowners to ensure that suitably located previously developed sites are brought forward for development.

(PPW, para. 3.56)

Development Efficiency

Higher densities should be encouraged in urban centres to generate a critical mass of people to support services such as public transport, local shops and schools.

(PPW, para. 3.51)

Accessibility

Development proposals must seek to maximise accessibility by walking, cycling and public transport.

(PPW, para. 4.1.11)

5.0.15 In addition to PPW, further detail is provided by a series of Technical Advice Notes (TANs) relating to a range of issues. The most relevant TAN to the submitted application is:-

TAN 12: Design (March 2016)

Encourages high quality design, built environments and public realm from all new development.

5.1 LOCAL PLANNING POLICY

5.1.1 In terms of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the adopted development plan for the area within which the application site is located is

the Neath Port Talbot County Borough Council Local Development Plan (LDP) (2011 – 2026)(Adopted January 2016).

5.1.2 The LDP provides context for the consideration of the submitted development proposal and contains general development management policies, as well as site specific policies.

5.1.3 The LDP Proposal Map confirms the site is outside Lower Brynamman's settlement boundary and does not have any specific land use designation. However, the approval of the original outline application and subsequent Section 73 applications confirm that the principle of residential development at this location is fully policy compliant. It is therefore the policies of the Neath Port Talbot LDP that have been referred to in the preparation of this reserved matters submission, including the following:-

- Strategic Policy SP3 - Sustainable Communities
- Policy SC1 - Settlement Limits
- Strategic Policy SP10 - Open Space
- Policy OS1 - Open Space Provision
- Policy TR2 - Design and Access of New Development
- Strategic Policy SP21 - Built Environment and Historic Heritage
- Policy BE1 - Design
- Strategic Policy SP22 - Welsh Language
- Policy WL1 - Development in Language Sensitive Areas

5.1.4 A high level of policy support is confirmed for the proposal, at both a national and local level. Purely in terms of land use issues, there is no reason to consider the proposed scheme to be unacceptable, as the wide ranging positive gains are significant.

6.0 JUSTIFICATION

- 6.0.1 The overall principle of residential development at this location is considered to be acceptable, by virtue of its planning history. The proposal will clearly contribute towards the vitality and viability of Lower Brynamman.
- 6.0.2 Both national and local planning policy support the provision of residential accommodation in appropriate locations.
- 6.0.3 A number of key considerations have informed the proposed scheme:-
- the site is situated adjacent to the built-up area of Lower Brynamman and therefore, by definition, meets the aspiration for sustainable development as set out in PPW
 - the site is appropriate for residential development in terms of scale and location
 - the LDP promotes the delivery of new homes in appropriate locations
 - the principle of residential development is already established
 - the land use proposed is entirely compatible with surrounding neighbouring uses
 - the proposed development is readily deliverable within the context of all financial, technical and environmental considerations
 - the proposal will engender socio-economic benefits through the delivery of residential accommodation in a sustainable location and also through the provision of construction employment opportunities.
- 6.0.4 The proposed scheme is consistent with PPW's overall placemaking strategy and will create economic uplift and value within the local economy, along with increased economic input via expenditure, thereby creating and delivering high quality residential accommodation for the community.
- 6.0.5 The primary objective of Welsh Government policy is to require housing proposals to be considered in the context of the presumption in favour of sustainable development.

- 6.0.6 The submitted scheme therefore complies with these general aspirations at a local and national level in boosting housing supply, through the redevelopment of a brownfield site at a sustainable location.
- 6.0.7 The proposal also complies with LDP policies which relate to securing housing diversity across the plan area.
- 6.0.8 The proposed development of this ‘windfall’ site, which is readily available and highly deliverable, will blend with the prevailing residential context of the locality.
- 6.0.9 The site is in a highly sustainable location, with easy walking, cycling and public transport connectivity to a wide range of community, education, retail and employment facilities.
- 6.0.10 It is considered therefore, that the proposed scheme represents an entirely appropriate form of development at this location, which wholly respects neighbouring uses, whilst providing a high quality standard of accommodation for future occupiers.

7.0 CONCLUSION

- 7.0.1 It is considered that the proposed development fully accords with the latest Welsh Government planning policy and placemaking objectives within Planning Policy Wales, as well as those at a local level, which support the delivery of housing. The proposed development will also make efficient and positive use of an under-utilised, brownfield, urban site.
- 7.0.2 The proposed residential dwellings will provide a high standard of accommodation for future occupiers in close proximity to public transport facilities, local services and employment, as well areas of open space.
- 7.0.3 It is therefore respectfully requested that this reserved matters submission be approved.