

Rock Street Flood Alleviation Scheme

Planning Statement

Neath Port Talbot County Borough Council

9th September 2021

NE06_001-ATK-GEN-SWMWREC-RP-LP-000001

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Introduction

1. Introduction

This Planning Statement has been prepared by Atkins on behalf of Neath Port Talbot County Borough Council (NPTCBC) to support an application for full planning permission to develop the Rock Street Flood Alleviation Scheme, hereafter referred to as the Scheme.

The Scheme is required to alleviate flood risk from the Gelliceibryn Brook to properties on Rock Street and Robert Street in Glynneath. Currently there is insufficient capacity in the existing drainage system to convey surface water during storm events. The proposed scheme removes over 200 properties from the predicted 1% (1 in 100) Annual Exceedance Probability (AEP) flood extent.

Broadly the Scheme consists of the installation of a new reinforced concrete inlet structure with a steel trash screen, safety guardrail and fencing, raising of the river banks adjacent to the new inlet structure to contain flows, a new wall adjacent to an open channel, a new buried 900mm diameter concrete culvert under the highway and through fields by open cut and thrust bore techniques, removal of an existing box culvert under the highway and replacement with new, removal and replacement of an existing wall, a new reinforced concrete outfall structure with safety guardrail, steps and erosion protection at the River Neath and a temporary vehicular access from the B4242 to the existing A465 embankment for construction access. A full description of the Proposed Development is contained within section 4 of this Planning Statement.

1.1. Application Documents

This planning application submission comprises the following documentation and drawings:

Table 1-1 – Application Submission

Document/ Drawing Title	Reference
Planning Application Form & Certificate	On planning portal
Planning Statement (this document)	NE06_001-ATK-GEN-SWMWREC-RP-LP-000001
Glynneath Flood Consequence Assessment	NE06_001-ATK-GEN-SWMWREC-RP-LW-000002
Preliminary Ecological Assessment	60940
Proposed Scheme Overview	NE06_001-ATK-GEN-SWMWREC-DR-CD-000001
Plan and Long Section Sheet 1	NE06_001-ATK-GEN-SWMWREC-DR-CD-000002
Plan and Long Section Sheet 2	NE06_001-ATK-GEN-SWMWREC-DR-CD-000003
Plan and Long Section Sheet 3	NE06_001-ATK-GEN-SWMWREC-DR-CD-000004
Plan and Long Section Sheet 4	NE06_001-ATK-GEN-SWMWREC-DR-CD-000005
Adopted Highway Boundary	NE06_001-ATK-GEN-SWMWREC-DR-CD-000006
Tree and Shrub Removal Plan	NE06_001-ATK-GEN-SWMWREC-DR-CD-000007
Existing Inlet General Arrangement	NE06_001-ATK-GEN-SWMWREC-DR-CD-000008
Existing Inlet Structure Sections	NE06_001-ATK-GEN-SWMWREC-DR-CD-000009
Proposed Inlet General Arrangement	NE06_001-ATK-GEN-SWMWREC-DR-CD-000010
Inlet Structure Sections and Details	NE06_001-ATK-GEN-SWMWREC-DR-CD-000011
Existing Open Channel Works General Arrangement	NE06_001-ATK-GEN-SWMWREC-DR-CD-000020
Proposed Outlet General Arrangement	NE06_001-ATK-GEN-SWMWREC-DR-CD-000030
Typical Drainage Details – Sheet 1 of 2	NE06_001-ATK-GEN-SWMWREC-DR-CD-000040
Typical Drainage Details – Sheet 2 of 2	NE06_001-ATK-GEN-SWMWREC-DR-CD-000041

The Scheme is not a major development, does not involve the provision of any dwelling houses and does not include a building with a floorspace of 100m² or more. Therefore, in accordance with Section 7 of The Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a Design and Access Statement is not required.

2. Location

2.1. Site Context

The application site, hereafter referred to as the Site, is situated in Glynneath, within the Upper Neath Valley, and is located entirely within the administrative boundary of Neath Port Talbot County Borough Council (NPTCBC). The site is less than 1ha in area therefore is not classed as 'major development' and so pre-application consultation is not mandatory.

Glynneath (population approx. 5,000) is a historic mining town, to the north east of Neath on the A465, it is located on the River Neath, which flows in a north east to south west direction, within the Upper Neath Valley, bound by steep slopes to the north and south exceeding 100m AOD. The town is centred around the High Street (B4242) which acts as the district centre. The surrounding area, to the north and south, is typified by steep wooded valleys which rise away from Glynneath which is located on the valley floor. The Site is at an approximate elevation of 55m Above Ordnance Datum (AOD). However, towards the northern site boundary, the elevation increases to 70m AOD over a distance of 60m. The topography of the whole study area is more variable, with elevation decreasing in a southwest direction.

The Scheme is located around the residential area of Rock Street and Lancaster Close of Glynneath - grid reference SN8793006730. The Site starts at the existing inlet at the Gelliceibryn Brook which is situated within semi natural ancient woodland. At this location is the connection point of a Public Right of Way (PRoW) comprising Footpath 30/9.N.Hi/1, which is adjacent to the inlet, and Footpaths 30/8.N.Hi/2, 30/8.N.Hi/1 and 30/7.N.Hi/2. From here, the watercourse travels through a series of culverts beneath the access roads to commercial properties and a series of open channels to the first property on Lancaster Close. The watercourse travels through two 600mm diameter culverts, one of which is blocked. These pass under the front gardens of the residential properties and discharge into an open channel before turning 90 degrees through a box culvert under Lancaster Close. Lancaster Close is used to access Rock Street and Roberts Street. Located to the north east of Lancaster Close and New Street are some allotments, Peniel Pentecostal church, Cwmnedd Primary School and YGG Cwm Nedd (Welsh Primary School). From the exit point of the culverts, the watercourse enters an open channel and turns towards the Maeshir Care Home, car park and wooded parkland before following the private footpath at the side of the care home and through the park. High Street, a mixed use residential and retail area with a post office nearby. South of Park Avenue (B4242) is semi-rural comprising an undeveloped field and the tree lined embankment of the old A465 which is also the former alignment of the Neath Canal. The watercourse outfalls into the Neath Canal which in turn discharges to the River Neath further downstream.

2.2. Designations

An online search has been carried out in order to identify whether the site is located within or in proximity to any statutory or non-statutory designated sites.

The Cadw historic map online map shows the following:

- Bethania Calvinistic Methodist Chapel Grade II Listed Building – approx. 225m
- Bethany English Presbyterian Church Grade II Listed Building – approx. 250m
- Walls and railings to Bethany English Presbyterian Church Grade II Listed Building – approx. 250m
- Piers and railings to Bethania Calvinistic Methodist Chapel Grade II Listed Building – approx. 350m

The Natural Resource Wales (NRW) mapping shows the following:

- Ancient Semi Natural Woodland – Within the Site
- Coastal and Floodplain Grazing Marsh Priority Habitat – Within the Site
- Flood Zones Low to High from Rivers – Within the Site
- Flood Zones Low to High from Surface Water & Small Watercourses – Within the Site

The NPTCBC adopted Local Development Plan proposals map (2016) shows the following:

- H1/LB/28 Glynneath – approx. 200m
- H1/23, R1/4, VRS1/1 Park Avenue, Glynneath – Within the Site
- R2/1 District Centre High Street, Glynneath - approx. 100m
- SP21/4(c) Glynneath Woollen Mill Conservation Area – approx. 500m

- M1 Safeguarded Coal Resource – Within the Site
- M2/1 Settlement Protection Zone – Within the Site
- EN2/3 Special Landscape Area - approx. 150m
- SP15/1(b) Cwm Gwrelych and Nant Llyn Fach Streams Site of Special Scientific Interest – approx. 1.25km
- SP15/1(b) Dyffrynoedd Nedd A Mellte A Moel Penderyn Site of Special Scientific Interest – approx. 2.25km
- SP15/1(a) Coedydd Nedd a Mellte Special Areas of Conservation – approx. 2.25km

The NPTCBC Public Rights of Way network online definitive map shows the following:

- 30/9.N.Hi/1 Footpath – Adjacent
- 30/8.N.Hi/2 Footpath – approx. 15m
- 30/8.N.Hi/1 Footpath – approx. 30m
- 30/7.N.Hi/2 Footpath – approx. 30m

2.3. Planning History

The details of the planning applications in proximity to the Site that are relevant to the proposed Scheme are listed below:

P2011/0486 – Granted December 2019

Land to the west of Rock Street and Robert Street is allocated for development under Ref.H1/LB/28 in the adopted Neath Port Talbot CBC Local Development Plan (January 2016). This site also benefits from planning permission (Application Ref: P2011/0486) for development of 10 detached dwellings and associated works. An application to discharge conditions 4 (replacement culvert) and 6 (access arrangements for maintenance of the new culvert inlet and outlet including a new inlet and grill) (Application Ref: P2020/0772) was approved in July 2021. This development site is outside of the Site on Park Avenue approx. 100m away.

P2020/0364 – Granted July 2020

Peniel Pentecostal Church, a proposed extension to existing church to provide a cafe (Class A3 Use). This development site is adjacent to the Site on Lancaster Close.

3. Background

3.1. Need for the Development

Properties on Rock Street and Robert Street in Glynneath experience flooding because there is insufficient capacity in the existing drainage system to convey surface water during certain storm events and due to a blocked culvert.

The Scheme is required to alleviate high probability flood risk from the Gelliceibryn Brook to properties on Rock Street and Robert Street. Following detailed feasibility and hydraulic modelling, a scheme is put forward for works to provide capacity to alleviate flooding to the 1 in 100 year standard. The proposed scheme removes over 200 properties from the predicted 1% (1 in 100) Annual Exceedance Probability (AEP) flood extent. The works will involve installation of a new culvert in the highway and through fields which will be buried underground. This will discharge to the River Neath.

3.2. Design Development

The Outline Business Case (OBC) in 2018 by JBA Consulting identified that in the current situation, 41 residential properties were at risk of flooding in the 50% Annual Exceedance Probability (AEP) flood event and this increases to 78 residential properties in the 1% AEP flood event, (a further 32 properties are at flood risk). From the OBC, a preferred option was identified by JBA Consulting which comprised: reprofiling and deepening of over 40m of the Gelliceibryn Brook to contain river flows, upgrading of a 60m length of existing culvert with a new box culvert with a new inlet structure; unblocking of existing twin 0.6m diameter culverts and the design of a new 1m high, 25m long flood wall along the length of the open channel downstream of the twin 0.6m diameter culverts.

Since the OBC, further modelling has been undertaken by Atkins which has confirmed that the new scheme proposed removes over 200 properties from the predicted 1% (1 in 100) Annual Exceedance Probability (AEP)

flood extent. This is described further in the Flood Consequence Assessment, reference NE06_001-ATK-GEN-SWMWREC-RP-LW-000002. As a result of this, the preferred scheme by JBA in the OBC has been developed with the need for additional works and discharge to the River Neath which is described in section 4 below.

3.3. Consultation

Consultation has been carried out during the development of the Scheme, both formally with statutory consultees (NRW on the need for a Flood Risk Activity Permit), with other regulating bodies and with members of the public and affected landowners. As part of this, pro-active discussions have taken place with the Local Planning Authority (LPA) ahead of submission of this planning application.

A request for pre-application advice was submitted to NPTCBC as the LPA in September 2020 in order to gain a detailed understanding of the local consultee's views on the proposals. The enquiry set out the background and need for the Scheme. The request also set out the proposed option including preliminary drawings of the Scheme. Planning and environmental constraints were set out as well as details of relevant planning policy.

A meeting was held between the LPA and the design team to discuss the proposals further in April 2021. The meeting discussed the pre application feedback and to agree the way forward. This discussion considered various aspects including the different consents required or available to the applicant, and potential constraints within the Site.

The LPA noted that any works that are on, over or under the existing drainage network or constitute maintenance or repair are permitted development under Part 14 Class A of the Town and Country Planning (General Permitted Development) Order (GPDO) 1995). Any other works require planning permission, such as the new culvert in the highway to the River Neath.

It was also noted by the LPA that as long as the compound and storage areas are connected to the red line boundary, they are permitted development under Part 4 Class A of the GPDO. Therefore, the compound area does not need to be within the red line and would not count towards the total site area. The LPA noted that as the proposal is under 1ha, pre-application consultation (PAC) will not be required before a planning submission to the LPA. The LPA noted that the EIA requirements at Rock Street would be as per The Environmental Impact Assessment (Land Drainage Improvement Works) Regulations 1999 & 2017) and not under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

It was highlighted that there is a need to clear some trees to construct the inlet. The LPA noted we should try to avoid mature trees where possible for the inlet and to be mindful of any potential bats and birds prior to construction. It was noted by the LPA that there are no TPO's on the trees, and therefore the tree felling does not require consent from NPTCBC. The LPA noted Ancient Woodland is designated by NRW but that the proposal is unlikely to impact the Ancient Woodland designation due to the small area of works required. The LPA highlighted the presence of contaminated land in the area. The LPA also noted the need to consider the visibility from the junction near the new inlet. It was highlighted that visibility should improve with the removal of existing smaller trees and that the inlet is located just within the woodland away from the road.

4. Proposed Development

4.1. Proposal

The proposed works will involve installation of a new culvert which will be buried underground in the highway and through fields. This will discharge to the River Neath. Refer to drawing NE06_001-ATK-GEN-SWMWREC-DR-CD-000001 for the Proposed Scheme Overview. The Rock Street Flood Alleviation Scheme comprises of the following elements:

- Reprofiting of Gelliceibryn Brook banks and associated drainage works including new ACO drains.
- Construction of a new reinforced concrete inlet structure and steel trash screen and guardrail. Area surrounded with palisade or timber featheredge fencing at Lancaster Close.
- New buried 600mm diameter concrete culvert from the Lancaster Close inlet structure to the existing twin 600mm diameter culverts.
- Laying a new buried 900mm diameter concrete overflow culvert (approx. 650m long) from Manhole (MH) 1 to MH 8 underground at Lancaster Close and car park.
- Installation of a new wall adjacent to the open channel at the bottom of Lancaster Close to contain flows.

- Removal and replacement of the concrete wall adjacent to the walkway between the flats and houses fronting onto Park Avenue to establish the thrust bore pit.
- Removal of the existing 1220 x 650 concrete culvert and replacement with new on the line of the existing watercourse that crosses Lancaster Close. This connects the upstream 600mm diameter culverts to the open channel downstream.
- A new 900mm diameter concrete underground culvert from MH 8 to MH 9.
- A 900mm diameter concrete underground culvert from MH 9 to MH 11.
- A new 900mm diameter concrete underground culvert from MH 11 to MH 12.
- A 900mm diameter underground culvert from MH 12 to the outfall.
- Construction of a new concrete outfall structure, with associated steel safety guardrail (1.1m high) and steps at the River Neath.
- Temporary vehicular access at junction of the old A465 Glynneath bypass with B4242 opposite Morfa Glas and laying of geotextile and crushed stone (Type 1 sub-base).

The thrust bore tunnelling activities will generate spoil. The existing site is constrained due to the flood plain and the SINCR designation next to the river. Therefore, all spoil generated by the Scheme will be disposed of offsite.

A temporary construction compound is proposed to be located within the field south of Park Avenue (B4242) and part of the car park off Lancaster Close.

One of the existing twin 600mm diameter culverts in the front gardens of Lancaster Close will be fully cleaned to remove any blockages. This element of the scheme is permitted development and is therefore excluded from the planning application.

4.2. Construction

Construction works would be undertaken between 07:00 and 19:00 Monday to Friday, and 08:00 to 13:00 on Saturdays, with no work over public and bank holidays. Individual construction elements for the works will cover a 12 month period scheduled to commence in January 2022 and be completed by end of winter 2022.

A site compound will be located to the south of the B4242 on grass. Removal of topsoil and grass will also be required for a temporary gravel and sub-base lay down area for temporary site offices and the access track will be constructed in the compound area from the B4242. The site compound will be used to store construction materials, plant and machinery, including a bunded storage area for diesel and fuels and all refuelling of plant, and site offices and basic welfare facilities for the contractors (self-contained kitchen/ toilets). Both the site compound and gravel surface will be removed following construction, and the area re-topsoiled and grassed/ seeded, returning it to its existing condition.

All materials for this Scheme, including the site compound units, will be delivered to site by road. Examples of likely plant to be used are a tracked excavators, dumpers, Tunnel Boring Machine (TBM), mobile crane, micro-tunnelling equipment and JCBs. The existing access arrangements onto the Site will be modified to allow vehicles to pull off the B4242 road.

The flow in the existing channel will be flumed with a series of temporary culverts to allow the flow to continue. Over pumping and use of settlement tanks may also be required to manage flows. The area for the inlet structure will be excavated by machine then be constructed by hand using steel and timber formwork used to create the temporary shutters for the concrete wall. Once the structure is complete the temporary diversion culverts will be removed and flows diverted back.

The culvert will be constructed from the downstream end to the top end of the scheme. It is proposed that the 900mm diameter concrete culvert in the highway at Lancaster Close and field south of the B4242 will be constructed with an excavator to make a trench in the road and field using traditional open cut trench techniques with use of a trench box. An excavator and dumper to fill around the pipe, backfill the trench and reinstate the surface as existing.

The 900mm diameter concrete culvert across the B4242 highway will be constructed by thrust boring techniques using a Tunnel Boring Machine (TBM). This method of construction will minimise disruption to traffic on the B4242. The tunnelling machine cutter head will be operating within a slurry medium and does not employ a percussive action. The noisiest kit is the separation & centrifuge, about 75dB at 10m, 70db at 15m. Mitigation measures, such as the timing and duration of works and potentially acoustic screens, will be employed to minimise noise effects. These measures will be set out in a Construction Environmental Management Plan (CEMP).

For the TBM works, there will be a need to create launch and receiver pits formed with a temporary sheet pile cofferdam perimeter wall for the thrust boring machine. At the works in the lane and field to the south, a launch pit (at MH 12 initially and then MH 9) will consist of a 5.5m x 4.5m pit and will be excavated approx. 500mm below the MH invert level. The receiver pit will be installed at the location of MH 11 and MH 8 and will consist of a 4.5m x 3.5m fully enclosed cofferdam as above. The tunnelling equipment will then be lifted by crane into place and thrust bored from MH 12 to MH 11 and once complete from MH 9 to MH 8. At MH 12 a crane platform will also be required to accommodate a mobile crane and the access at the entrance to the old A465 and down to the MH location will need to be upgraded to allow plant access. Once the pipe run has been installed and the micro-tunnelling equipment has completed its task it will be removed by crane and taken off site. The cofferdams at the receiver pits will be used to construct the manholes for the culverts in the dry. Then the temporary cofferdams will be removed, the area backfilled and the ground reinstated to its original condition.

The outfall structure adjacent to the River Neath would be a precast or reinforced concrete construction with safety railings and a hinged metal flap valve or screen for safety and with access steps for maintenance. It will be constructed from the landward side and not within the River Neath. An excavator will excavate the riverbank from the land to allow installation. At the base of the concrete headwall there will be the need for blockstone, stone rip rap and erosion protection matting to provide scour protection.

5. Planning Legislation and Policy

This chapter reviews the planning policy framework against which the proposed development is to be considered. It includes relevant planning acts, policy and guidance at the national level, as well as adopted policies in the local development plan.

5.1. Legislation

5.1.1. Planning (Wales) Act 2015

The Planning (Wales) Act 2015 amended the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004. The Act introduced a number of reforms to the way in which planning is dealt with in Wales and is a material consideration. The Act introduced a number of reforms to strengthen development planning including the introduction of a National Development Framework which replaced the Wales Spatial Plan and provisions for the establishment of Strategic Planning Panels to prepare Strategic Development Plans. The Act also delivered improvements to development management and enforcement systems.

5.1.2. Well-being of Future Generations (Wales) Act 2015

This piece of legislation is a material consideration in the determination of planning applications in Wales. The Act places a duty on Welsh Ministers (and other public bodies) to produce well-being objectives that accord with the national well-being goals, presented in Table 5-1; and take reasonable steps to meet those objectives in the context of the principle of sustainable development.

Table 5-1 – Welsh Wellbeing Goals

Goal	Description
A prosperous Wales	An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
A resilient Wales	A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
A healthier Wales	A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
A more equal Wales	A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).

A Wales of cohesive communities	Attractive, viable, safe and well-connected communities.
A Wales of vibrant culture and thriving Welsh language	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
A globally responsible Wales	A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

Moreover, to demonstrate that appropriate consideration has been given to the Well-being goals and sustainable development principle in the decision-making process, public bodies are required to have regard to the 'five ways of working' contained in the Well-being Act. These require consideration of involvement; collaboration; integration; prevention; and long term factors. Each of these are set out in detail below:

Table 5-2 – Welsh Wellbeing Goals – Ways of Working

Way of Working	Description
Involvement	The importance of involving people with an interest in achieving the well-being goals and ensuring that those people reflect the diversity of the area which the body serves.
Collaboration	Acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives.
Integration	Considering how the public body's well-being objectives may impact upon each of the well-being goals, on their objectives, or on the objectives of other public bodies.
Prevention	How acting to prevent problems occurring or getting worse may help public bodies meet their objectives.
Long-term	The importance of balancing short-term needs with the needs to safeguard the ability to also meet long-term needs.

5.2. National Planning Policy

5.2.1. Future Wales

Future Wales – the National Plan 2040, published February 2021, is the national development framework for Wales. It sets the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

5.2.1.1. Chapter 4 - Strategic and Spatial Choices: Future Wales' spatial strategy

The policies established in Future Wales are material considerations to decisions on planning applications. The policies in Future Wales relevant to this Scheme are set out below:

Policy 8 – Flooding states that flood risk management will be used to support sustainable strategic growth and regeneration in National and Regional Growth Areas, prioritising development in Growth Areas with no flood risk. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority to improve the protection of developed land and opportunities for Growth Areas. Flood management infrastructure investments must maximise social, economic and environmental benefits; and not have an adverse impact on international and national statutory designated sites for nature conservation and the features for which they have been designated.

Policy 9 – Resilient Ecological Networks and Green Infrastructure emphasises the importance of the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, alongside the strategic focus of Future Wales on urban growth. This policy states this will be achieved by the Welsh Government working with key partners to:

- Identify areas which should be safeguarded, in Strategic and LDPs, and created as ecological networks or their importance for adaptation to climate change, for habitat protection, restoration or creation, to

protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and

- Identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

Natural Resources Wales produces indicative maps illustrating natural resource themes, as illustrated below, and should be used as a starting point for considering the resilient ecological networks and green infrastructures. Area statements should identify the strengths and opportunities to strengthen ecological networks. Any priority areas for action identified in Area Statements are a material planning consideration and development plans should set out appropriate policies to safeguard and connect these areas.

5.2.1.2. Chapter 5 - The Regions

This Chapter recognises that regional planning will play an increasingly important role in the future and is central to the Welsh Government's vision for a three tiered planning system. Wales' four regions provide a focus for Welsh Government policy and future investment. Each region has its own distinctive opportunities and challenges. Embracing these through more effective regional collaboration will lead to better outcomes for all parts of Wales and create a fairer distribution of wealth and opportunity. Glynneath falls within the South West Wales Region which covers Carmarthenshire, Neath Port Talbot, Pembrokeshire, Swansea and Pembrokeshire Coast National Park.

Policy 28 – National Growth Area – Swansea Bay and Llanelli the Welsh Government supports sustainable growth and development in Swansea Bay and Llanelli which will be the main focus for growth and investment in the South West region. The Welsh Government will work with regional bodies and local authorities to promote and enhance Swansea Bay and Llanelli's strategic role and ensure key investment decisions support places in the National Growth Area and the wider region. Strategic decisions on the location of key services and infrastructure should support existing settlements and be taken on a regional basis, ensuring they are located in the most accessible and sustainable locations, support actions to address inequality and deprivation and improve links to adjoining regions.

5.2.2. Planning Policy Wales: Edition 11

Planning Policy Wales (PPW), published February 2021, sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TAN), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

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 and the Well-being of Future Generations (Wales) Act 2015.

The policies established in PPW are material considerations to decisions on planning applications. These policies are set out in PPW in paragraphs over six chapters.

5.2.2.1. Chapter 2 – People and Places: Achieving Well-being Through Placemaking

Creating sustainable places is the goal of the land use planning system in Wales. Sustainable places are the output of the planning system rather than the process of achieving them. All development decisions, either through development plans policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improving well-being.

The key sections of this chapter which relate to the Scheme are set out in Table 5-3 below:

Table 5-3 – Relevant Sections from Chapter 2

Section	Policy
Key Planning Principles	The five Key Principles of Collaboration; Prevention; Long-term Vision; Involvement; and Integration represent a guiding vision for all development plans. These principles support the culture change needed to embrace placemaking and ensure that planning facilitates the right development in the right place.
Planning Policy Wales and Placemaking	At a strategic level, traditional planning policy topics can be clustered around four themes which contribute individually to placemaking: • Strategic & Spatial Choices; • Productive & Enterprising Places;

- Distinctive & Natural Places; and
- Active & Social Places.

These themes draw together the linkages between planning policies to make it clear how individual components contribute to placemaking.

5.2.2.2. Chapter 3 – Strategic and Spatial Choices

Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. It should be noted that the policy issues should not be considered in isolation from one another. This includes considering the design of a development and its impacts upon everyday lives as well as thinking holistically about where people might live and work and which areas should be protected. These crucial, early decisions will have the greatest impact on the type of development which is ultimately delivered and its contribution to sustainable development and the environmental, social, cultural and economic well-being of Wales.

The key sections of this chapter which relate to the Scheme are set out in Table 5-4 below:

Table 5-4 – Relevant Sections from Chapter 3

Section	Policy
Placemaking in Action	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. 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 surrounding area. Design is an inclusive process, which can raise public aspirations, reinforce civic pride and create a sense of place and help shape its future. For those proposing new development, early engagement can help to secure public acceptance of new development.

This section of PPW understands that supporting infrastructure is important to all planning authorities as it underpins economic competitiveness and opportunities for the local residents and businesses. Para 3.62 states that planning authorities should, in conjunction with key providers, take a strategic and long-term approach to towards the provision of infrastructure as part of plan making. This may involve collaboration between key infrastructure providers to ensure infrastructure provision is sustainable, fit for purpose and can be co-ordinated and timed to support placemaking aspirations.

5.2.2.3. Chapter 6 – Distinctive and Natural Places

The Distinctive and Natural Places theme covers environmental and cultural components of placemaking. These components are complementary to those of the Active and Social and Productive and Enterprising themes and collectively the three themes come together to contribute towards the national sustainable placemaking outcomes.

Table 5-5 – Relevant Sections from Chapter 6

Section	Policy
The Historic Environment	The historic environment comprises all the surviving physical elements of previous human activity and illustrates how past generations have shaped the world around us. It is central to Wales's culture and its character, whilst contributing to its sense of place and identity. It enhances quality of life, adds to regional and local distinctiveness and is an important economic and social asset. The historic environment is made up of individual historic features which are collectively known as historic assets. Examples of what can constitute an historic asset include: • Listed buildings; • Conservation areas; and • Townscapes.

Section	Policy
Conservation Areas	There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings. Positive management of conservation areas is necessary if their character or appearance are to be preserved or enhanced and their heritage value is to be fully realised.
Green Infrastructure	The Environment (Wales) Act 2016, provides a context for the delivery of multi-functional green infrastructure. Its provision can make a significant contribution to the sustainable management of natural resources, and in particular to maintaining and enhancing biodiversity and the resilience of ecosystems in terms of the diversity between and within ecosystems and the extent, condition and connectivity of ecosystems and their ability to adapt.
Landscape	All the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places.
Water and Flood Risk	Climate change is likely to increase the risk of flooding as a result of sea-level rises, increased storminess and more intense rainfall. Flooding as a hazard involves the consideration of the potential consequences of flooding, as well as the likelihood of an event occurring. The continued construction of hard engineered flood defences to protect development in areas of floodplain is not sustainable. Government resources for flood and coastal defences are directed at protecting existing developments and are not available to provide defences in anticipation of future development. Development should reduce, and must not increase, flood risk arising from river and/or coastal flooding on and off the development site itself. The priority should be to protect the undeveloped or unobstructed floodplain from development and to prevent the cumulative effects of incremental development

5.2.3. Technical Advice Notes

As noted above, the Welsh Government has prepared a series of Technical Advice Notes (TAN) which supplement PPW. The relevant TANs which have been considered are outlined in Table 5-6:

Table 5-6 – Technical Advisory Notes

Technical Advisory Note	Policy Overview
TAN 5: Nature Conservation and Planning (2009)	TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.
TAN 11: Noise (1997)	TAN 11 provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business. It outlines some of the main considerations which local planning authorities should take into account in drawing-up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.
TAN 12: Design (2016)	The purpose of TAN 12 is to equip all those involved in the design of development with advice on how 'Promoting sustainability through good design' and 'Planning for sustainable building' may be facilitated through the planning system.
TAN 15: Development and Flood Risk (2004)	This TAN 15 provides technical guidance which supplements the policy set out in Planning Policy Wales in relation to development and flooding. It provides a framework within which risks arising from both river and coastal flooding, and from additional run-off from development in any location, can be assessed.
TAN 24: The Historic Environment (2017)	TAN 24 provides guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and Listed Building (LBC) applications. This TAN provides specific

Technical Advisory Note	Policy Overview
	guidance on how the following aspects of the historic environment which are relevant to the Scheme should be considered: • Archaeological remains; • Listed buildings; • Conservation areas; and • Historic assets of special local interest.

5.3. Local Planning Policy

5.3.1. Neath Port Talbot Local Development Plan

The Neath Port Talbot County Borough Council Local Development Plan adopted January 2016 sets out both the strategic planning policies for the district and the development management policies. Those policies which are applicable to this proposed development are listed below:

Strategic Policy SP1 Climate Change the causes and consequences of climate change will be addressed by implementing the following measures. The efficiency and sustainability of the County Borough's settlements will be enhanced through developing more cohesive and efficient settlements and settlement patterns. Likely increased food risk will be taken into account and addressed by ensuring that there is greater resilience by avoiding development on land that is at risk from flooding in the first instance in accordance with the sequential approach set out in national guidance or in locations that could increase the risk of flooding elsewhere. The fragmentation of habitats will be minimised and opportunities made for habitat and species change and migration where possible.

Strategic Policy SP3 Sustainable Communities seeks the delivery of sustainable, healthy and cohesive communities and the conservation of the countryside.

Policy SC1 Settlement Limits ensures that development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle. Outside settlement limits, development will only be permitted under the following circumstance it is associated with the provision of public utilities, infrastructure and waste management facilities that cannot reasonably be located elsewhere.

Strategic Policy SP4 Infrastructure seeks developments to make efficient use of existing infrastructure and where required make adequate provision for new infrastructure, ensuring that there are no detrimental effects on the area and community.

Strategic Policy SP6 Development in the Valleys Strategy Area: In the Valleys Strategy Area the local economy and communities will be enhanced and reinvigorated and the distinctive environment will be protected through promoting a mixed use regeneration scheme at Glynneath.

Policy VRS1 Valleys Regeneration Scheme allocated land to the south of Park Avenue for a mixed use regeneration scheme including retail (Allocation R1/4) and residential (Allocation H1/23).

Strategic Policy SP14 The Countryside and the Undeveloped Coast seeks the protection and where feasible enhanced through the following measures, the protection of the open countryside through the control of inappropriate development outside settlement limit.

Strategic Policy SP15 Biodiversity and Geodiversity states that important habitats, species and sites of geological interest will be protected, conserved, enhanced and managed through the following measures, the identification of the following Internationally and Nationally designated sites within the County Borough to enable their protection: Special Areas of Conservation (SACs) and Ramsar Sites; Sites of Special Scientific Interest (SSSIs); National Nature Reserves (NNRs). The identification and protection of sites of regional and local importance; The protection of important natural heritage features.

Policy EN6 Important Biodiversity and Geodiversity Sites proposals that would affect Regionally Important Geodiversity Sites (RIGS), Local Nature Reserves (LNRs), Sites of Interest for Nature Conservation (SINCs), sites meeting SINC criteria or sites supporting Local Biodiversity Action Plan (LBAP) or S42 habitats or species will only be permitted where they conserve and where possible enhance the natural heritage importance of the site; or the development could not reasonably be located elsewhere, and the benefits of the development outweigh the natural heritage importance of the site. Mitigation and/or compensation measures will need to be agreed where adverse effects are unavoidable.

Policy EN7 Important Natural Features proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows/ field boundaries, watercourses or ponds will only be permitted where account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; or the biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.

Strategic Policy SP16 Environmental Protection seeks that the air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures by ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels; by giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable; and ensuring that developments do not increase the number of people exposed to significant levels of pollution.

Policy EN8 Pollution and Land Stability proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/ or local amenity or would expose people to unacceptable risk due to the following will not be permitted: Air pollution; Noise pollution; Light pollution; Contamination; Land instability; Water (including groundwater) pollution. Proposals which would create new problems or exacerbate existing problems detailed above will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/ or local amenity to an acceptable level.

Strategic Policy SP17 Minerals seeks to safeguard identified resources of coal, hard rock and sand and gravel.

Policy M1 Development in Mineral Safeguarding Areas proposals within mineral safeguarding areas will only be permitted where it can be demonstrated that the mineral concerned is no longer of any value or potential value or there is an overriding need for the development; or the scale and location of the development would have no significant impact on the possible working of the resource.

Policy TR2 Design and Access of New Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied including the development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation.

Policy BE1 Design promotes high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment, Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible. Its drainage systems are designed to limit surface water run-of and flood risk and prevent pollution.

Policy BE3 The Canal Network In order to protect and conserve the canal network, the following lengths of canal will be safeguarded, the Neath Canal from Briton Ferry to Ysgwrfa Bridge, Aberpergwm. Developments affecting locations where lengths of canal have been drained, infilled, culverted, obstructed or cut off from the remainder of the network, but where there is the possibility of future reinstatement, will be expected to take into account the historic line of the canal and to avoid the introduction of buildings or structures that would prevent reinstatement.

6. Development Appraisal

Section 70(2) of The Town and Country Planning Act 1990, confirms that planning applications should be determined in accordance with the Development Plan unless material circumstances indicate otherwise.

6.1. Planning Considerations

The relevant planning considerations raised by the proposed development are summarised and assessed against the prevailing planning policy framework below.

6.1.1. Flood Risk and the Water Environment

A Flood Consequences Assessment (FCA) (Atkins, August 2021) for Glynneath has been prepared and submitted in support of this application. Refer to FCA document NE06_001-ATK-GEN-SWMWREC-RP-LW-000002 for further details. The FCA has been produced in accordance with Technical Advice Note 15 (TAN 15). Although TAN 15 relates to the siting and impact of new development it provides a framework within which risks arising from both river and coastal flooding can be assessed. TAN 15 does not permit flood risk elsewhere to be

increased as a result of developing a site. One of the key issues the FCA assesses is whether there is an adverse effect on fluvial flooding as a result of the proposed improvements through the construction of the alleviation scheme which in effect is reducing the amount of water being stored on the floodplain.

The Scheme is required to alleviate flood risk from the Gelliceibryn Brook to properties on Rock Street and Robert Street in Glynneath. Currently there is insufficient capacity in the existing drainage system to convey surface water during storm events. The proposed scheme removes over 200 properties from the predicted 1% (1 in 100) Annual Exceedance Probability (AEP) flood extent.

The modelling assessment with scheme has demonstrated that the consequences of flooding of the proposed scheme are acceptable and that the flood risk can be managed. In addition, the scheme will reduce the flood risk to the people and both residential and commercial properties of Glynneath. A summary of the modelling output is provided below:

- The proposed works have been shown to provide a 1% (1 in 100) AEP standard of service.
- The 0.1% AEP fluvial events have been tested in the hydraulic model for the current day pre-scheme (Baseline), and With-scheme situations.
- A 100-year development lifetime has been assumed. Climate change effects on fluvial flows up to a 1% AEP event have been applied.
- There is no detriment or negative effects to fluvial flooding as a result of the scheme that would increase flood risk elsewhere.

The proposed Scheme which aims to reduce flooding is therefore in compliance with Chapter 6 of Planning Policy Wales, Policy 8 of Future Wales, TAN 15 and Strategic Policy SP1 Climate Change, Strategic Policy SP4 Infrastructure of the Neath Port Talbot Local Development Plan.

Measures to avoid impacts on water environment during construction will be set out in a CEMP to comply with Policy SP16 Environmental Protection and Policy EN8 Pollution and Land Stability in the Neath Port Talbot Local Development Plan.

6.1.2. Contaminated Land

A generic quantitative risk assessment (GQRA) has been undertaken with reference to the site-specific data obtained as part of the September 2020 ground investigation. An assessment of risk has been undertaken using precautionary Generic Assessment Criteria (GAC), that represent minimal or tolerable risk, relevant to the Potential Contaminant Linkages (PCLs). In addition, the potential implications of the contaminant concentrations, suitability of material for reuse and the preliminary waste classification have been assessed. Land contamination is assessed through the identification and assessment of PCLs. The approach in the following section is in accordance with the Contaminated Land Exposure Assessment (CLEA) model produced by DEFRA and the Environment Agency and as outlined in the DEFRA/ Environment Agency Land Contamination Risk Management Guidance (LCRM).

No visual evidence of non-aqueous phase liquids (NAPL) was reported during the site investigation. Visual evidence of contamination within the soil comprised plastic, fragments of red engineering brick and brick, among others. There was no olfactory evidence of contamination reported from the site investigation.

Based on the investigation and assessment, the overall contamination risk associated with the site is considered to be low to human health, controlled waters, property and ecological receptors under the current and future end use. Therefore, the Scheme is in accordance with the following policies: Policy 9 of Future Wales, Chapter 6 of Planning Policy Wales and Strategic Policy SP4 Infrastructure, Strategic Policy SP16 Environmental Protection and Policy EN8 Pollution and Land Stability of the Neath Port Talbot Local Development Plan.

6.1.3. Ecology

A Preliminary Ecological Assessment (PEA) has been undertaken (TACP (UK) Ltd, October 2020) to determine the potential impacts of the proposed development on ecological features within the Site. Reference should be made to the PEA for full details on the ecological baseline, the potential impacts of the proposed development, as well as mitigation and enhancements measures.

The PEA identifies protected and notable species that are known to be present either on the Site or in the surrounding area (1-2km). A Phase 1 Habitat Survey was carried out by TACP in September 2020 to provide a baseline for assessing the value of the habitats and their potential to support protected species.

The PEA noted that the Scheme would involve minor loss of part of the semi natural ancient woodland. The habitats on site do not correspond to any EU Annex I habitats or UK/ Neath Port Talbot, BAP habitats and do not

contain any rare or protected species of flora or fauna. There is evidence of invasive non-native species (INNS) to the north of the site and at the egress of the existing culvert subsequent to the crossing beneath Lancaster Close.

The fields to the south of the B4242 have seasonal constraints with regards to nesting birds and there is potential for reptiles and amphibians. The field boundaries and the small woodland lining the wet ditch to the south of this field has the potential to support bats. However, on the whole the ecological constraints are considered manageable.

In addition, consultation has been undertaken with the NPTCBC Ecologist between July and August 2021 about the potential loss or effects to trees and vegetation due to the proposed Scheme. A site walkover was conducted with the Ecologist on the 5th August 2021. Effects to trees are discussed further below.

In accordance with advice received from the NPTCBC Ecologist, vegetation clearance will take place in winter, brash piles will not be left on site as it will encourage reptiles to move into the works area (chippings rot and give off warmth) and will encourage birds to nest in brash piles. Any areas proposed for wood piles will be agreed with the local planning authority in advance. As the SINC's are becoming degraded by the amount of scrub that is currently growing, scrub clearance in some areas will benefit the SINC.

The PEA demonstrates that the proposed development would result in minimal significant residual effects, with most of the proposal underground. Some aspects like scrub clearance are likely to have a beneficial effect on the SINC's habitats and species. In this regard the proposed development supports Policy 9 of Future Wales and Chapter 6 of Planning Policy Wales and Strategic Policy SP14 The Countryside and the Undeveloped Coast, Strategic Policy SP15 Biodiversity and Geodiversity, Policy EN6 Important Biodiversity and Geodiversity Sites, Policy EN7, Important Natural Features and Strategic Policy SP16 Environmental Protection of the Neath Port Talbot Local Development Plan.

A tree clearance and shrub removal drawing NE06_001-ATK-GEN-SWMWREC-DR-CD-000007 shows the location of effected trees and shrubs by the proposed Scheme. Consultation has been undertaken with the NPTCBC Ecologist between July and August 2021 about the potential loss or effects to trees due to the proposed Scheme. A site walkover was conducted with the Ecologist on the 5th August 2021. The general findings of the walkover in relation to trees, designations and Invasive Non-Native Species (INNS) are contained in Table 6-1 below:

Table 6-1 – Vegetation Survey

Location	Designation	Noted Species	Proposal	Response	INNS
Intake	Ancient Semi Natural Woodland Woodland SINC	Small/ Young Trees	Trees to be removed at inlet as identified on drawings.	Trees should be removed outside of nesting bird season. Replacement of trees is needed. The trimming of trees in the car park is acceptable. Wood from felled trees can be piled up. Chippings can be spread out but if there is a large amount then they should be removed.	Himalayan balsam and Buddleia
Garages		Small/ Young Trees Pear Tree		Trees should be removed outside of the nesting bird season. Replacement trees will be needed. There is a pear tree so potential to replace it with a new pear tree.	Montbretia
Car Park		Rowan Tree		Trimming the overhanging trees over the car park is acceptable. The Rowan tree next to the road needs replacing if lost.	Leylandii
Field and North side of Embankment	Lamb and Flag SINC	Conifer Trees		Trimming the trees out of nest bird season is acceptable. Any lost trees should be replaced	

Flood Plain and South side of Embankment	Lamb and Flag SINC				Japanese Knotweed
Access road from B4242		Trees and shrubs		Trimming the trees and shrubs out of nest bird season is acceptable to create access. Any lost trees should be replaced.	

Within the Ancient Woodland, designated by NRW. Trees are to be removed to accommodate the Scheme. During previous consultation with the LPA (see section 3.3 above), it was noted that the loss of trees is unlikely to impact the designation due to the small area of works required and young age of the trees. It was also noted by the LPA that there are no Tree Preservation Orders (TPO) on the trees along the proposed route.

All pre-construction tree removal and vegetation is proposed to take place in winter to avoid the bird nesting season. It is proposed for tree replacement to be done on a 2:1 basis and consist of suitable native, local tree species such as hazel, oak, rowan, silver birch, alder, cherry etc.

There is potential for minor negative impacts to existing trees and designations however, due to the proposed 2:1 replacement and young age of the trees to be lost, this potential impact is expected to be mitigated and therefore potential negative effects are anticipated to be minimal against planning policy including Policy 9 of Future Wales and Chapter 6 of Planning Policy Wales and Strategic Policy SP14 The Countryside and the Undeveloped Coast, Strategic Policy SP15 Biodiversity and Geodiversity, Policy EN6 Important Biodiversity and Geodiversity Sites, Policy EN7 Important Natural Features and Strategic Policy SP16 Environmental Protection of the Neath Port Talbot Local Development Plan.

6.1.4. Heritage

There are no designated heritage assets within the Scheme extent. There is one conservation area, Glynneath Woollen Mill, approximately 350m west of the Scheme. There are two non-designated heritage assets within the Site extent. There are 16 non-designated heritage assets in the Study Area. Most of the heritage assets within the Study Area relate to the town's industrial and ecclesial heritage.

Key notable land use developments of the site and surrounding area within a 500m radius, indicated on historical mapping, are summarised in Table 6-2 below:

Table 6-2 – Historic Land Uses

Year	The Site	Development within 500m of the site
1876 - 1877	The site is shown to comprise of mostly fields in the south. The northern half is within woodland with the presence of two waste tips from the local coal pits. A large building named Gelli Ceubren is located in the northwest of the site. A linear feature runs through the site from north-south, which could be a railway/ access track.	The area north of the site is mostly covered with vegetation along with numerous embankments that vary in size from approximately 25m to 165m. Numerous old coal pits and levels are present to the north and northeast of the site. The nearest coal pits are located approximately 85m from the site and nearest coal level is approximately 25m from the site. Numerous buildings are present within 500m of the study area, most commonly to the east and south of the study area. Most of the buildings are located approximately 200m southeast of the study area.
1884	A well is located at the northern extent of the site.	A canal is present approximately 260m south of the site. An iron and brick works are present 300m to the southeast. A disused school is present, along with a burial ground, approximately 370m to the west of the site.

		A section of railway is present approximately 430m to the south of the study area in a west east orientation.
1899	The building located in the northwest of the site appears to have decreased in size.	Additional buildings are present in the urban development approximately 200m southeast of the site.
1900	No significant changes.	The iron and brick works are now labelled as brick and cement works. A carbon works is now present approximately 310m south of the site.
1918 - 1919	A series of railway tracks are present in the east running down to the south from a Coal screening area. The supposed track on the 1876 to 1877 mapping is shown as an old tramway. A gravel pit is present adjacent to the tramway tracks in the north-east of the site. The building in the northwest of the site has increased in size	Coal screens are present adjacent east of the site including a goods shed adjacent to the east. The urban development to the southeast of the site has significantly increased in size towards the site. This includes the construction of a school approximately 40m east of the site
1921	No significant changes.	The brick and cement works are now shown to be disused. The carbon works are no longer present
1938	Rock Street and Robert Street are present extending westwards out of the site. Four small buildings have appeared in the north.	The urban housing development is continuing to increase, extending northwards. A new road has appeared running northeast – southwest approximately 80m south of the site. Several buildings have appeared northwest and west of the site within 250m.
1953	The railway tracks have now been removed.	Railway track are no longer present in close proximity to the site, along with the goods shed. Allotments are located 35m east of the site. A new railway siding is now present approximately 320m south of the site. A small urban housing development has appeared approximately 350m west of the site.
1962 - 1964	Five buildings have appeared to the north along with a church to the south. A swimming pool has also appeared to the southeast.	No significant changes.
1964	No significant changes.	The urban housing development approximately 350m west of the site has expanded westward.
1972 - 1981	Houses are now present east of Lancaster Close. An allotment is now present immediately east of the new houses. A coal yard is now labelled opposite Rock Street, north of the new houses. A large building has also appeared in the southeast.	The A465 has now been upgrade to a dual carriageway and moved 250m south of the site, running in a west – east direction. A fire station is present approximately 430m southeast of the site. The urban development east of the site continues to increase in size eastward.
1980	No significant changes.	The railway approximately 430m to the south is labelled as dismantled.
1983	No significant changes.	A large building has been constructed immediately west of the site in the southwest corner. The urban development west of the site has increased in size westwards.
1995 - 1996	No significant changes.	Additional buildings are now present

Three clusters of post medieval chapels are located within the Study Area, 200m east of the Scheme. One is a large chapel within extensive churchyard (09139w), built in 1839, rebuilt in 1874 and rebuilt again in 1894.

Another large 19th century chapel (09368w) with slate roof and stone front elevation is located within this cluster. It has buff brick highlights to window and door surrounds and quoins. The other chapel (09470w) is set back from the High Street within a walled graveyard in the centre of the town. It has a painted render and stone front elevation with window surround and quoin highlights and prominent above central entrance which reads "Erected 1846, Re-erected 1876".

Glynneath was formerly in the historic county of Glamorgan. Industrialisation started in Glynneath with coal mining in 1793, and rapidly expanded when the Neath Canal came to the village in 1775. Many features of the old canal still survive to the present. Neath and Tennant Canals (01027.0w) which dissect through the southern portion of the Scheme, provided 21 miles of waterway from Aberdulais to Swansea and from Glynneath to Briton Ferry. The two canals were built separately, the Neath under Acts of Parliament of 1791 and 1793. These waterways were vital to the industrial development of the Vale of Neath in the days before the railways.

The historic alignment of the Neath Canal follows the historical route of the old A465 Glynneath bypass, which was built initially in the 1970s, the canal was culverted above Ysgwrfa lock, to allow the road to be straightened. Above (east of) Pentremalwed lock, the road was built over the canal bed, which has been lost. This bypass road was superseded by the A465 dual carriageway in 1996 which became the new bypass. An embankment along the route of the old A465 bypass remains but is unused and lies over the final section of the Neath canal, with part of the existing A465 dual carriageway running over the site of the former Glynneath basin. The canals are currently being restored by the Neath and Tennant Canals Preservation Society

A Condition Survey for the Neath Canal, undertaken in 2006, considered the navigable depth required for restoring missing sections of the canal. This states that the "The canal will be restored to a trapezoidal profile with a 1.5m depth of water and a 300mm freeboard. Whilst the full 1.5m depth will not be needed for modern canal barges, the channel is normally oversized slightly to allow for a build up of silt. The sides of the channel will need to be graded to a stable maximum slope of 1 vertical to 2 horizontal." The proposed depth of the culvert is in excess of 1.5m so, in the event that the canal is restored in this location, it will still be possible to build a new canal channel above the proposed culvert.

The construction of the Vale of Neath Railway (02500.0m) 105m south of the Scheme, was authorised by Act of Parliament in 1846. The first trains ran between Neath and Pontypool in 1863 and in the same year the Vale of Neath Railway amalgamated with the Great Western Railway. The line played an important part in the later development of industry and mining in the Vale of Neath carrying coal, iron and chemicals as well as passengers. The line was closed in 1985. The line between Neath and Glynneath is now being restored by the Vale of Neath Railway Society as a potential tourist attraction. The Hirwaun Common Mineral Railway (03220m) was marked as a tramroad on the tithe map of c.1840 and a conventional locomotive-operated railway on the OS map of c.1880. A tramway incline (01039.1m) runs 800m west from Deri Hir and built as part of the Cefn Rhigos Tramroad in 1803-5, with the objective to connect the ironworks at Aberdare with the Neath Canal and used by a high-pressure steam-engine.

The Scheme goes through the Old Tramway (07604w) however, it is likely that there are no remains of the tramway in-situ.

Consultation with Glamorgan-Gwent Archaeological Trust took place in August 2021. It was considered that the Scheme would have no impacts to the historic environment. It was stated by the County Archaeologist that "*There is no indication that there are any archaeological or historic environment features that would be adversely affected by the proposal and therefore we do not propose any mitigation.*". Further consultation was undertaken with the LPA about potential effects to conservation, particularly in relation to the former canal, in August 2021.

Therefore, due to the already disturbed nature of the culvert corridor, no physical impacts are anticipated to either archaeology or the non-designated heritage assets during the construction or operational phase of the proposed Scheme.

Overall, there will be minimal harm to archaeology and the non-designated heritage assets within the Site extent or study area, with no impacts anticipated so the proposals would satisfy both Chapter 6 of Planning Policy Wales and Policy BE1 Design, Policy BE3 The Canal Network of the Neath Port Talbot Local Development Plan regarding the impact of developments on heritage assets and their setting.

6.1.5. Design and Visual Impact

The Proposed Development is an engineering scheme to manage surface water drainage and as such its design is utilitarian and simple to enable this requirement.

The intake and outfall structures are the only significant above ground elements. Their size is determined by the capacity required to manage flood risk. The inlet structure is detailed on drawing NE06_001-ATK-GEN-SWMWREC-DR-CD-000010 and 000011 comprising of reinforced concrete walls on 3 sides which vary in height

from approximately 700mm to 1740mm from existing ground level. The inlet structure also includes a galvanised steel trash screen situated within the walls of the structure and stainless steel guardrail on top. Concrete steps are provided to allow operatives to access and maintain the structure. The inlet structure will be secured by 2m high palisade or feature edge fencing and will include an access gate for NPT to use a JCB to access and remove debris from the sump of the structure. The inlet structure is situated at the same location as the existing inlet and is partly screened from view along Lancaster Close and PRoW Footpath 30/9.N.Hi/1 by woodland. The outfall structure is detailed on drawings NE06_001-ATK-GEN-SWMWREC-DR-CD-000030 and 000040. It comprises of a concrete headwall 2.4m high, however most of this is buried in the ground and only approx. 1.5m (of which 1.1m is guardrail and 0.4m concrete at ground level) high is above existing ground. This faces the River Neath. The outfall will contain access steps to the side for maintenance, the outfall structure is situated adjacent to the CSO outfall and is partly screened from view by intermittent tree cover and vegetation from the river and A465 bridge. In addition, there will be the removal and replacement of the concrete wall adjacent to a walkway between the care home and houses fronting onto Park Avenue to allow construction for the underground culvert at that location. The proposed sections of new culvert are underground and therefore will not be visible, except where they connect to the open channels of the existing culvert, for short sections.

The Proposed Development has been carefully designed to ensure its visual impact is as limited as possible whilst still providing flood alleviation to neighbouring properties. The Scheme design seeks to minimise its impact above ground while not impacting on the ancient woodland or streetscape within Glynneath and at the embankment of the River Neath. The arrangement and mainly underground nature of much of the Scheme and the colours of materials chosen ensure that it is acceptable in design and visual terms and therefore the Proposed Development complies with Chapter 3 and Chapter 6 of Planning Policy Wales and Strategic Policy SP14 The Countryside and the Undeveloped Coast, Policy SC1 Settlement Limits and Policy BE1 Design of the Neath Port Talbot Local Development Plan.

The construction compound and stone area would be temporary and would be removed on completion of the proposed works. These temporary effects would not likely result in adverse landscape, visual or amenity impact during the construction phase. This is consistent with Chapter 6 of Planning Policy Wales, Strategic Policy SP4 Infrastructure, Strategic Policy SP14 The Countryside and the Undeveloped Coast.

6.1.6. Access and Layout

The local PRoW network consists of Footpath 30/9.N.Hi/1, Footpath 30/8.N.Hi/2, Footpath 30/8.N.Hi/1 and Footpath 30/7.N.Hi/2. Access to all these PRoWs will be maintained during construction. Users of 30/9.N.Hi/1, which crosses the Gellicebryn Brook, will be diverted approx. 5m to facilitate construction of the new intake. Once construction is complete users should see improvements to the local PRoW network at this location due to decreased flood risk.

During construction the riverside footpath will be the subject of a temporary minor diversion around the proposed location of River Neath outfall during its construction. The effect on access will be negligible.

Access to the Site for construction is from the local highway network including Lancaster Road and the B4242.

To construct the proposed Lancaster Close culvert and intake, temporary lane closures are required along Lancaster Close car park and the Gellicebryn Brook, which will affect access to Rock Street and Robert Street. It is envisaged that access to these streets for residents and local businesses will be continued for the duration of the construction works, with the lane closure controlled by either traffic signal or a banksman. Properties to the east of Lancaster Close will continue to have access during the construction period. Disruption to vehicles is expected to be negligible due to low traffic volumes and the limited duration of the works. A separate highways order from the local highways authority will be requested for the traffic management works. Once construction is complete the roads will be returned back to their original state.

Car parking space in the car park off Lancaster Close behind the care home will be temporarily reduced to allow construction of the culvert. The car park is within the control and ownership of NPTCBC. The footpath at the side of the care home between the car park and Park Avenue (B4242) will be temporary closed during construction. The footpath is private and is not identified as a PRoW on the NPTCBC definitive map. The path will be the subject of a minor diversion during construction. Once construction is complete the affected portion of the car park and the private footpath will reopen. The temporary and partial closure of the car park and the temporary closure of the footpath are not expected to have any significant effects.

To construct the proposed outfall at the River Neath, and to facilitate the delivery of tunnelling equipment to the embankment of the former Glynneath Bypass, a temporary access will be required from Park Avenue (B4242) at the junction of the old A465 Glynneath Bypass with the B4242 opposite Morfa Glas. It is proposed to create a new temporary access onto the B4242 and then lay a temporary geofabric membrane and stone hardstanding on top from Type 1 sub-base up to the existing tarmac section of the old bypass on the embankment. The old

bypass is within the ownership of Welsh Government/ South Wales Trunk Road Agency (SWTRA). Therefore, it is considered the temporary use of this route for access is consistent with its previous use as a highway. This temporary access forms a part of the planning application. Once construction is complete the temporary access will be removed and the roads will be returned back to their original state.

Given the above the Scheme is in compliance with Policy TR2 Design and Access of New Development of the NPTCBC Local Development Plan.

6.1.7. Land Use

In accordance with Strategic Policy SP17 and Policy M1 of the NPTCBC Local Development Plan, the scale and location of the Scheme would have no significant impact on the possible working of the mineral resource within the identified mineral safeguarding area.

The culvert proposed in the fields to the south of the B4242 will follow line of and remain as close as possible to the existing combined sewer overflow. This will ensure it has the least impact on the layout of any future development of the site as proposed by Strategic Policy SP6 Development in the Valleys Strategy Area and Policy VRS1 Valleys Regeneration Scheme in the NPTCBC Local Development Plan whilst ensuring there is sufficient space for maintenance access to the sewer.

7. Conclusion

On behalf of NPTCBC planning permission is sought for the construction of the Rock Street Flood Alleviation Scheme.

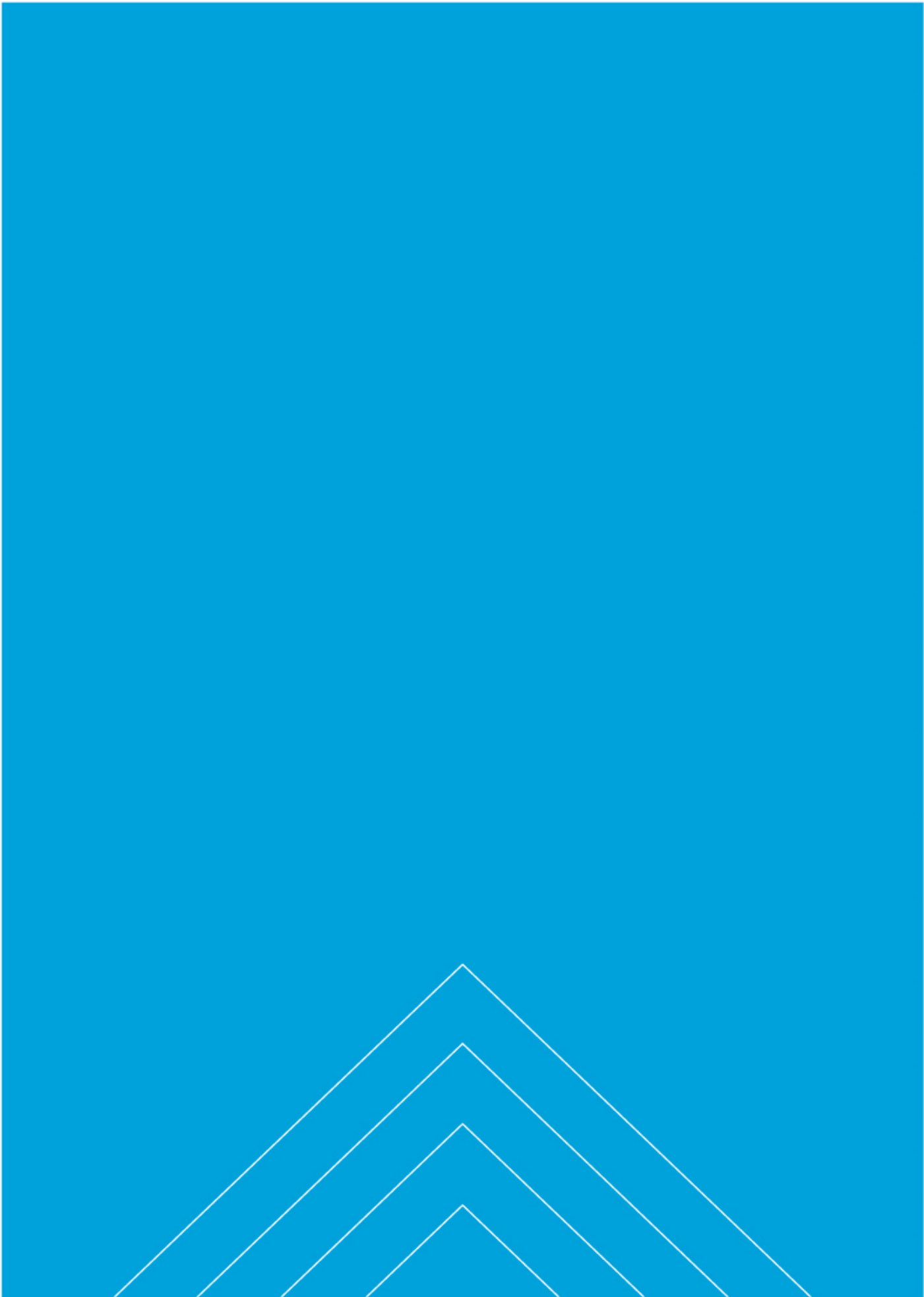
Section 70(2) of the Town and Country Planning Act 1990 requires that all planning applications should be determined in line with the policies and proposals of the Development Plan unless other material considerations determine otherwise. The emphasis of the plan-led system continues to provide the policy context for the consideration of planning applications for the development or use of land under Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Properties on Rock Street and Robert Street in Glynneath experience flooding. The Scheme is required to alleviate flood risk from the Gelliceibryn Brook to properties on Rock Street and Robert Street in Glynneath. Currently there is insufficient capacity in the existing drainage system to convey surface water during storm events. The proposed scheme removes over 200 properties from the predicted 1% (1 in 100) Annual Exceedance Probability (AEP) flood extent.

It has been demonstrated that the Proposed Development as a simple engineering structure would be appropriate for its location. It is considered that the design of the Proposed Development would be acceptable in principle.

This Planning Statement sets out how it is considered that when applying a planning balance, the benefits proposed by the Scheme outweigh any perceived harm. With mitigation, the Scheme is not anticipated to result in any adverse impacts in terms of access, flood risk, ecology, landscape, heritage or noise. Where appropriate the Scheme will contribute to the goals set out in the Well-being of Future Generations (Wales) Act 2015.

Planning legislation requires that planning applications are determined in accordance with the Development Plan unless material circumstances indicate otherwise. It is considered that the planning balance for the proposed development, weighs plainly in favour with national planning policies and the Local Development Plan, therefore representing sustainable development in the context of planning policy and as such planning permission should be granted.



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