
Planning Statement

Coed Darcy, Former Llandarcy Oil Refinery, Neath

Prepared by Savills on behalf of St. Modwen
Developments Ltd

Planning Statement

Coed Darcy, Former Llandarcy Oil Refinery



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1. Introduction

- 1.1. When the former BP Llandarcy Oil Refinery finally ceased production for the last time in 1998, the land and buildings that remained presented not only a challenge to its owners and the local authority, but a major opportunity for a new developer partner. Located to the west of Neath, south of Skewen and only a short distance to the east of Swansea, the land on which the vast former oil refinery sat was exceptionally well placed to be recycled and repurposed.
- 1.2. The proposals developed between the then owners – BP – and the local authority – Neath Port Talbot CBC – Welsh Government (then Welsh Assembly Government) and the Princes Foundation and involved the creation of a new 'Urban Village'. This hugely ambitious project would see the considerable buildings at the refinery demolished, the land remediated, and in their place the construction of a new urban village and community with around 4,000 homes, employment, education facilities etc.
- 1.3. This vision was captured at that time in the Unitary Development Plan, where the land was allocated for development; and shortly after outline planning permission was granted for the development. This was the catalyst for the preparation of further detailed information and strategies to discharge conditions; demolition and remediation works to prepare the site for development; and the construction of new infrastructure which would facilitate development.
- 1.4. The first phase of development comprising just under 300 homes was completed in 2018, however, since then no further construction has taken place. The reason for this is quite simple. Despite numerous attempts to adapt the extant planning permission and to change the phasing of infrastructure, it has simply not been possible to make the development viable. The cost of delivering the development (and associated infrastructure, remediation and servicing) exceeded the revenue that would have been generated from the sale of the new homes; and as such the development stalled.
- 1.5. Whilst the site remains an exceptional opportunity to deliver a high-quality new community, it not possible to achieve this through the current outline planning permission. The decision was therefore taken by St. Modwen Developments Ltd to progress a new outline planning application and to put in place proposals

which are viable and capable of delivering the regeneration of this important brownfield site to create a thriving new community.

- 1.6. This Statement has been prepared in support of the new outline planning application submitted by Savills on behalf of St. Modwen Developments Ltd (hereafter referred to as 'the applicant'). The application is for a smaller, more manageable and less infrastructure-heavy scale of development than the previous permission, comprising up to 2,000 residential dwellings, a primary school, retail, public open space, employment space and supporting infrastructure. It has been prepared with very careful attention not only to the infrastructure required to support a new community in this location but also with a thorough understanding of viability to ensure that the development is deliverable and the difficulties that the site faced in the past are not repeated.

Planning Statement

- 1.7. The purpose of this Planning Statement is to assess the proposal against relevant local and national planning policy and guidance and other material considerations, and thereby to assist the local planning authority in determining the planning application in accordance with s38(6) of the Planning and Compulsory Purchase Act 2004.
- 1.8. This Statement provides comprehensive details of the application proposals, the context and history of the site, an overview of the national and local planning policy which is relevant to the determination of the planning application and a detailed analysis of the planning considerations. It concludes with an overview of the key issues and provides a summary of the principal benefits of the proposals.
- 1.9. The Statement is structured as follows:
- Section 2: Site, Surroundings and Planning History
 - Section 3: Pre-Application Consultation and Engagement
 - Section 4: Development Proposals
 - Section 5: Planning Policy Context and Relevant Material Considerations
 - Section 6: Planning Assessment

- Section 7: Summary and Conclusions

Planning Application Documentation

1.10. In addition to this Statement, the planning application is supported by a suite of technical studies; with the application according with the LPA's validation checklist. These documents should be considered in conjunction with this Statement in order to provide a comprehensive understanding of the application and the benefits that the proposed development will deliver.

- Parameter Plans;
- Illustrative Masterplan;
- Topographical Survey;
- Design & Access Statement;
- Transport Assessment;
- Framework Travel Plan;
- Flood Consequences Assessment and Drainage Strategy
- Arboricultural Report;
- Employment Report;
- Sustainability Statement;
- Energy Strategy;
- Resource Efficiency Framework Plan;
- Shadow Habitats Regulations Assessment;
- Pre-application Consultation Report.

Environmental Impact Assessment

1.11. The proposed development has been the subject to an EIA Scoping Request under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Wales) (LPA Ref: P2021/0768). The Scoping Opinion confirmed that the proposals constitute EIA development and an ES is submitted to support this planning application including the following chapters:

- Non-Technical Summary
- Chapter 1: Introduction
- Chapter 2: The Site
- Chapter 3: Proposed Development
- Chapter 4: Methodology
- Chapter 5: Transport & Travel
- Chapter 6: Air Quality
- Chapter 7: Noise
- Chapter 8: Ground Conditions
- Chapter 9: Water Environment
- Chapter 10: Biodiversity
- Chapter 11: Landscape & Visual Impact
- Chapter 12: Climate Change
- Chapter 13: Socioeconomics
- Chapter 14: Proposed Mitigation & Residual Effects

Planning Statement

Coed Darcy, Former Llandarcy Oil Refinery



2. Site, Surroundings & Planning History

Site Location & Context

- 2.1. The site comprises a large proportion of the former BP oil refinery at Llandarcy. The refinery was first developed for industrial use during World War I, becoming the UK's first crude oil refinery. Since 1998, the refinery has been systematically decommissioned, and most of the structures have been demolished).
- 2.2. Located between Skewen to the north, Neath to the north east and Swansea to the south west, the site is immediately adjacent to Junction 43 of the M4 within Neath Port Talbot County Borough Council (NPTCBC). Swansea city centre lies 4km south-east of the site whilst Neath town centre lies circa 3.5km north-east. The site is currently accessed from the B4290 which feeds off junction 43 of the M4 motorway via the Northern Access Road (which has been implemented under the extant planning permission).
- 2.3. Swansea District railway line dissects the northern and central part of the site. The far northern boundary adjoins the 'north site' reservoir (which lies outside of the site boundary) and the M4 abuts the eastern boundary of this part of the site.
- 2.4. The application site also includes the existing buildings of Britannic House, Heritage House and William Knox House, and the original Contractor's yard, which is located to the south of the site boundary and to the north of Llandarcy Village, and is leased to a mix of businesses for open storage and industrial uses.

Application Site & Topography

- 2.5. The land is characterised by varied topography which is partly attributable to the underlying geology, and partly to the series of terraces that were formed to facilitate construction of the former oil refinery. The topographical high of the Site is the central southern area at an elevation of 80 metres above Ordnance

Datum (maOD). The Site elevation falls away in all directions, and the topographical low of 9 maOD is in the far south west of the Site which is occupied by Crymlyn Tip.

- 2.6. Near vertical slopes are present to the north of the existing Phase 1 residential development, and towards the west of the Site. In other areas of the Site, the topographical gradient is shallower.
- 2.7. The high point of the site is immediately west of the existing residential development lying at approximately 77.0mAOD and falls from east to west towards the Crymlyn Bog down to a level of approximately 9.0mAOD. Levels also fall from this high point to the railway line to north, which is in a cutting, and towards the existing Coed Darcy Business Park where levels are approximately 29.0mAOD. The topography north of the railway has a plateau through the centre, where levels are approximately 55.0mAOD which falls away to approximately 40.0mAOD along the northern and southern boundaries and approximately 25.0mAOD in the south-western corner of the site.

Water Features & Flood Risk

- 2.8. The North Site Reservoir forms the northern boundary of the site. The South Site Reservoir is located in the west of the Site and beyond which is the Crymlyn Bog. To the east of the site lies the River Neath (approximately 900m east of the site). In addition, a number of Dwr Cymru Welsh Water (DCWW) sewers cross the site boundary.
- 2.9. The Site is identified to lie outside the maximum flood extents from Rivers and Seas, in accordance with the recently released Natural Resources Wales Flood Map for Planning, with the majority of the site identified within Zone A of the Development Advice Mapping (DAM) which is considered the most appropriate area for development with regard to flood risk. A small area to the south-west of the Site is is

identified in DAM Zone C2, which is defined in TAN 15 as “*Areas of the floodplain without significant flood defence infrastructure*”, however all built development is located in DAM Zone A.

Natural Environment

- 2.10. The Crymlyn Bog Ramsar Site, Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR) abut the western boundary of the site.
- 2.11. The Pant-y-Sais SSSI is located approximately 1km to the south of the site and the Earlswood Road Cutting and Ferryboat Inn Quarries SSSI is 1.7km south-east.
- 2.12. Within the 2-5km radius of the site is the Crymlyn Bog and Pant y Sais NNR, Crymlyn Burrows SSSI, Six Pit, Swansea Vale and White Rock SSSI and the Glais Moraine SSSI.
- 2.13. The Coed Darcy GCN Area SINC is located partially within the Site at its south-western edge. In addition, much of the Site is designated as NPT Watercourses SINC. Moreover, the following non-statutory nature conservation designations are located within 2km of the site:
- Jersey Marine Woods & Gelli Bwch Farm SINC
 - Llandarcy Village Green SINC
 - Tennant Canal SINC
 - Neath Estuary SINC
 - M4 Corridor SINC
 - Main Swansea – Fishguard Railway Line SINC
 - Crymlyn Quarry Woodland SINC
 - Pentredwr Grasslands SINC
 - Red Jacket Fen Wildlife Trust Reserve (WTR)

- Pentrefynnon SINC
- Junction 44 Heathlands SINC

Historic Environment

- 2.14. There are no conservation areas, scheduled ancient monuments or listed buildings within the site boundary. Two designated sites have been identified in close proximity to the site – the Llandarcy Workers Village Conservation Area and St. Margaret’s Chapel Scheduled Ancient Monument. William Knox House is a designated by NPTCBC as a Locally Listed Building.
- 2.15. The site has been subject to a considerable amount of below ground impact from the construction and operation of the former refinery. This past ground disturbance will have had a seriously detrimental effect on any archaeological deposits that may have been present in the area.

Active Travel Context

- 2.16. There are no Public Rights of Way (PRoW) within the site, but there are two public footpaths within the vicinity of the site. In addition, footways with street lighting are provided along the B4290 and a shared footway cycleway is provided around the southern gyratory of Junction 43, and then off-road to Britton Ferry.

Planning History

- 2.17. Outline Planning Permission (OPP) for the redevelopment of the entire former oil refinery site was granted in February 2008. This OPP (reference P2005/0393) consented the delivery of 4,000 new homes, business and retail space and commercial, education, community facilities, public open space together with highways, drainage, services, infrastructure, car parking and landscaping. Since approval of the OPP, there have been a number of applications submitted for the site for various works.
- 2.18. Aside from infrastructure and remediation works (including the northern access road), phases 1A and 1B have been delivered by Persimmon Homes and comprised the development of just under 300 new homes. This permission has been built out and occupied.

3. Pre-Application Consultation & Engagement / Statement of Community Involvement

Public Engagement

- 3.1. Prior to the submission of the outline planning application, the applicant undertook early consultation with phase 1 residents to inform the community on the emerging proposals and discuss any queries or questions arising. A summary of the extent of consultation undertaken is set out below.
- 3.2. Drop-in sessions took place within the existing retail unit of the phase 1 development on:
- 29th July between 3 and 7pm
 - 3rd August between 4 and 7pm
- 3.3. At the drop-in sessions, members of the applicant's team and a member of their appointed planning consultancy team from Savills were available to discuss the proposals with local residents. Boards displayed the progression of the scheme and indicative masterplan for discussion.
- 3.4. The sessions were advertised on the applicant's website, via the Management Company for phase 1 and a letter was posted to every resident in phase 1. It is estimated that 60+ households attended and to date, 12 feedback forms have been received.
- 3.5. Separate to these events, regular meetings have taken place with the Working Group which is made up of phase 1 residents and the local Councillor representing Coedffranc West ward.
- 3.6. The key messages to come out of these sessions were:
- Residents want to see the traditional character and identity of the existing, delivered phase of Coed Darcy preserved through the next stages of development;
 - Residents want to see a local shop and further facilities come forward; and
 - Residents want to see the school come forward.

- Residents were pleased to see new foot and cycle networks being proposed to enhance connectivity in the area.

3.7. This engagement process is important in shaping the proposals and St. Modwen Developments Ltd are committed to maintaining a dialogue with the local community throughout the delivery of the development.

Pre-Application Consultation (PAC)

3.8. PAC is a statutory obligation in Wales where application documents are made available to the public and consultees to comment on for 28 days prior to the formal submission of the planning application.

3.9. PAC will run from Wednesday 13 October until Wednesday 10 November. Any comments received during this time will be reviewed and amendments made to the proposals where appropriate before the planning application is submitted.

3.10. The PAC documents will all be available to view and download by visiting the following website:
https://sites.savills.com/Coed_Darcy/

3.11. Alternatively, a hard copy of the PAC documents will be made available for public viewing at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath, SA10 6LH for the duration of the PAC period.

3.12. The planning application will be supported by a PAC Report which will fully explain the process and the outcomes as well as summarise the comments we receive.

Pre-Application Discussions

3.13. A thorough pre-application process has taken place with the NPT Council. Bi-weekly meetings have taken place with a number of planners and other officers since April 2021. Planning officers, policy officers, ecology officers, drainage officers, transport officers, education officers plus others have all been in attendance at various points.

Design Review Panel

3.14. An early stage masterplan and opportunities framework were presented to the panel of the Design Commission for Wales (DCFW) on 13 May 2021. DCFW response was positive; they were pleased to

note our approach to placemaking, active travel and the creation of a '15 minute neighbourhood' and highlighted further opportunities to develop a movement strategy to avoid car domination and integration of the green infrastructure through the street hierarchy.

- 3.15. The proposals are due to go to again to Design Commission for Wales on 14 October 2021 for a further detailed review of the proposed masterplan. The panel will provide a formal written response. The applicant's project team will review these comments and make amendments to the proposals where appropriate. The whole process of the design evolution will be explained fully in the Design and Access Statement which is submitted with the planning application.

4. Development Proposals

Description of Development

- 4.1. Outline planning permission is sought with all matters reserved except access, for the following development description:

“Outline planning application, with all matters reserved except for strategic access, for residential uses (C2 & C3 use class), including land for education (D1 use class) with associated public open space, commercial uses (A1, A2, A3, B1, D1 & D2), commercial / employment (B2 & B8) uses, public open space, highway works, sustainable drainage, ecological mitigation and enhancement, landscaping, ground remediation, and associated engineering and infrastructure works.”

- 4.2. Accompanying the Description of Development and appended to the application form is a schedule detailing the quantum of development by use. This schedule is copied in the table below.

Use Class	Use Description	Quantum
C2 / C3	Residential	Up to 2,000 dwellings on 40ha net residential area
D1	Land for Education. The application proposals include land for a two form entry primary school with additional ‘flexible’ land which could be used to deliver either a through school or residential development and open space.	2.6ha for education with a further 4.4ha of flexible land for education. The maximum floorspace for a primary school is 2,500sq.m. and the maximum for a through school is 15,000sq.m. <i>[Note: should the authority take up the option of the Through School this would reduce the quantum of land available for residential development by 1.7ha]</i>

Land for commercial purposes to be provided within the 'Flexible Mixed Use' zone on the Land Use Parameter Plan. There are two such areas:		
A1 / A2 / A3 / B1 / D1 / D2	(1) in the neighbourhood centre;	Up to 1,134 sq.m. GIA within the mixed use core of the proposals. This floorspace may be integrated within buildings which also contain residential dwellings. It is proposed that a maximum of 750 sq.m. GIA floorspace within this area is for A1 Retail use and that this quantum will be controlled by condition.
A3 / D1 / D2	(2) the conversion of existing buildings (known as Britannic House, Heritage House and William Knox House) close to the eastern boundary of the site.	Either residential dwellings (within the maximum parameter of 2,000 dwellings specified above) and / or up to 4,550sq.m. floorspace from the converted buildings.
B2 / B8	Extension to Darcy Business Park	Up to 800 sq.m. GIA on 0.22ha of land

Plans

4.3. The proposed development is defined by the description of development and by the arrangement of land uses that are identified on the parameter plans, which describe the extent of the proposed development with parameters established for siting, access, design and size.

4.4. The following plans are submitted for approval as part of this planning application:

- Site Location Plan (ref: 21009(05) 100 D);
- Land Use Plan (ref: 21009(05) 200 E);
- Scale and Massing Plan (ref: ref: 21009(05) 201 E);
- Movement Plan (ref: 21009(05) 202 E);
- Green Infrastructure Plan (ref: 2180801-SBC-00-XX-DR-L-101-PR08);

- Northern Site Access Drawing (ref: 510423/M4J43/209/200)

4.5. An Illustrative Masterplan (ref: 21009(05) 104 D) has also been prepared to show how the development can be delivered within the parameters set out within the Design and Access Statement; but this plan has been submitted for information purposes only and not for approval. As well as the illustrative masterplan, there are Indicative Drainage Strategy Plans (ref: 0547-A-0004-P11 and 0547-A-0002-P6) and a Strategic Soft Landscape Plan (ref: 2180801-SBC-00-XX-DR-L-102 PL02).

Housing

- 4.6. The proposed development provides land for up to 2,000 residential dwellings. The exact housing mix will be determined at the detailed stage, but it is expected that the development will include a range of house types to allow for a wide demographic and a mix of new homes. House types will be based upon 1-4 bedroom properties and are expected to include, apartments, terraced, semi-detached and detached houses, with private gardens and parking spaces.
- 4.7. The proposals include the provision of a proportion of affordable housing for those unable to access housing on the open market.
- 4.8. The residential site area covers 40 hectares with a housing densities between 36 and 44 dwellings per hectare (dph).

Access and Highways

- 4.9. The primary access will be achieved from Ffordd Coed Darcy which has already been built as part of the NAR network. The access to the northern part of the site (north of the railway) will be from a new junction on the B4290.
- 4.10. The detailed housing layout will be designed with a network of connected pedestrian and cycle friendly streets and will allow for safe movement around the site for all users. The access road will vary in width through the development. It will sit within landscape verges, which will include trees and drainage features. A range of additional pedestrian/cycle connections are proposed throughout the development. A new bus loop will be able to be formed within the development.

- 4.11. The Illustrative Masterplan demonstrates that sufficient parking can be achieved on the site, albeit the details of parking provision is a matter for reserved matter approval when the final housing mix is confirmed.

Green Infrastructure

- 4.12. The application proposals incorporate a significant level of green infrastructure through a Green Infrastructure (GI) Masterplan. This has been developed as part of the iterative masterplanning process, and has been informed by a tree survey, extensive ecological survey and assessment, drainage strategy, landscape and visual appraisal, and a suite of other technical surveys and reports.

- 4.13. In summary, the GI masterplan contains:

- Retained trees, hedgerows, woodland, scrub, and grassland with the potential for enhancement through management;
- Retained and enhanced water bodies, and a series of proposed new water bodies led by ecological mitigation and enhancement (not least for GCN);
- A series of proposed diverse grassland mixes and early successional habitats, including for extensive areas of dry, Open Mosaic Habitat. This targeting ecological enhancement and biodiversity gain along with aesthetic and interpretive uses to enhance POS and the public realm;
- Publicly accessible open space, equipped and unequipped play, distributed through a large GI/recreation network of paths. The play strategy focuses on the benefits of natural play integrated with the landscape context and components of the site;
- A network of linked footways and cycleway connecting the development with the adjacent road and public rights of way/path network and the extensive recreational landscape resource;
- Sustainable drainage features;
- The overall green infrastructure comprises a substantial proportion of the overall site area.

4.14. The GI is based upon delivering multifunctional greenspace so that it provides biodiversity, landscape, recreational, aesthetic and sustainability benefits. The majority of the GI will be publicly accessible (apart from dedicated ecology areas where access is likely to be detrimental for faunal species). New and existing residents alike will have easy access to areas of formal, semi-formal and 'wild' greenspace for play and recreation.

4.15. The majority of the existing hedgerows and trees are to be retained and integrated into the development. Proposed landscape elements across the site within the green infrastructure and throughout the built form are proposed to be proposed to:

- enhance micro-climate;
- provide an accessible and visible landscape structure to the development neighbourhoods;
- visually integrate development areas;
- create a network of habitat corridors for a range of native target species, linking with the garden resource and bat and bird boxes; and
- provide a diverse and interesting natural landscape asset promoting natural play for all ages.

4.16. The following open space provision is identified on the Illustrative Masterplan:

Typology	NPT Requirement ¹	Application Proposals
Outdoor Sport-Pitch	60,887 sq m	11,026 sq m
Outdoor Sport-Non Pitch	23,825 sq m	28,177 sq m
Designated play space (Neaps, Leaps, Laps etc)	13,236 sq m	13,236 sq m
Informal space	29,120 sq m	269,815 sq m
Allotments	10,060 sq m	TBC

Note – the Landscape GI plan does not specify the location of land for the specified typologies. There is however a large surplus of land in the 'informal space' typology and, in addition to this, retained and

¹ Calculated on the basis of 2,000 dwellings from the proposed development and an additional 300 dwellings completed on phase one.

proposed woodland / scrub areas totalling 193,358 sq.m. which will have managed public access. Subject to consideration of the ecological mitigation requirements associated with the application there is potential to redistribute land within the separate typologies in order to address particular requirements including allotment provision.

Drainage

- 4.17. The site lies wholly outside of the maximum peak flood extents identified within Natural Resources Wales (NRW) Flood Risk from Rivers and Seas mapping. Further to this, the majority of the site, lies within Zone A of the Development Advice Mapping (DAM) which is considered the most appropriate area for development with regard to flood risk, with only a small localised area to the south west of the Site lying within DAM Zone C2. All build development is proposed within DAM Zone A.
- 4.18. The site will implement a sustainable surface water drainage strategy, which will incorporate a range of attenuation features (e.g. swales, basins and ponds) and conveyance features (e.g. swales, filter drains and pipes). This strategy aims to mimic the pre-development, greenfield conditions with outfalls to the Crymlyn Bog, the North Site Reservoir, and the existing DCWW drainage network surrounding the Site., all at attenuated rates.

Utilities

- 4.19. It is anticipated that the proposed foul sewer network will be offered to DCWW for adoption under Section 104 of the Water Industry Act 1991. To meet the requirements for adoption, the proposed infrastructure must be designed and constructed according to Sewers for Adoption 7th Edition.

5. Planning Policy Context & Relevant Material Considerations

- 5.1. This section of the statement details the most relevant national and local planning policy context for the site and proposed development. It identifies relevant planning and land use documents which have informed and guided the proposed development from the outset and against which it will be assessed.

The Development Plan

- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. In this case, the development plan comprises of the following two documents:
- Future Wales: The National Plan 2040 - Welsh Government has formally adopted Future Wales: The National Plan 2040 (Future Wales). Future Wales outlines the Welsh Government's strategies for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, delivering growth in the right areas, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities.
 - Neath Port Talbot CBC Local Development Plan (LDP) – This document was adopted in 2016 and covers the period between 2011 and 2026. The LDP encourages the regeneration of previously developed land for housing delivery.

- 5.3. Whilst not having development plan status, the provisions of Planning Policy Wales (PPW) are also relevant. Technical Advice Notes (TANs) support PPW and add further detailed content a range of issues which may affect development.

Future Wales

- 5.4. The Welsh Government has formally adopted Future Wales: The National Plan 2040 (Future Wales). Future Wales outlines the Welsh Government's strategies for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, delivering growth in the right areas, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving

the health and well-being of communities. Unlike its predecessor, the Wales Spatial Plan, which was in place when the previous outline application and subsequent reserved matters applications were determined, Future Wales now forms part of the statutory development plan.

- 5.5. Future Wales sub-divides Wales into four regions with the application site located within the South West Wales region. A total of 36 policies are contained within Future Wales of which 19 are thematic and the remainder relate to the four regions.
- 5.6. The following themes and pertinent policies have been extracted because they are directly relevant to the determination of this planning application.

Location and shape of growth

- 5.7. Policy 1: Where will Wales Grow identifies a series of National and Regional Growth Areas within which new development is generally to be focussed. One of these National Growth Areas is the Swansea Bay and Llanelli urban cluster which includes Neath and the whole of the development site.
- 5.8. Policy 2: Shaping Urban Growth and Regeneration states that growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. It then goes on to identify seven key principles for placemaking:
- creating a rich mix of uses;
 - providing a variety of housing types and tenures;
 - building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;
 - increasing population density, with development built at urban densities that can support public transport and local facilities;

- establishing a permeable network of streets, with a hierarchy that informs the nature of development;
- promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and
- integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.

5.9. Policy 3: Supporting Urban Growth – Public Sector Leadership – this policy explains how the Welsh Government will play an active, enabling role to support the delivery of urban growth and regeneration.

5.10. Policy 17: Renewable and Low Carbon Energy and Associated Infrastructure – this policy strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet the future needs of Wales.

5.11. Policy 28: National Growth Area – Swansea Bay and Llanelli – this policy provides more information about aspirations for growth within this newly designated National Growth Area. The policy reaffirms that Neath is included within the National Growth Area.

5.12. The policy subtext identifies a requirement for 25,600 additional homes within the National Growth Area between 2019/2020 and 2039/2040 of which there is a need for 44% to be affordable.

Affordable Homes

5.13. Policy 7: Delivering Affordable Homes sets out the estimated housing need over the next 20 years. The housing need estimates also indicate that the provision of affordable homes should become a key focus for housing delivery. It is estimated over the next five years (2019-20 – 2023-24), under the central estimate, that on average the estimated annual additional homes are split almost equally between affordable housing (social housing or intermediate rent) and market housing.

Biodiversity and Green Infrastructure

- 5.14. Policy 9: Resilient Ecological Networks and Green Infrastructure seeks to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure. This should be achieved by identifying areas to be safeguarded, opportunities for the maximising the value of existing green infrastructure and introducing new green infrastructure. Where possible, existing designated or high value sites should be connected through green infrastructure improvements.

Connectivity

- 5.15. Policy 11: National Connectivity sets out the aspiration of the Welsh Government to support and invest in improving national connectivity. The priorities are to encourage longer-distance trips to be made by public transport, while also making longer journeys possible by electric vehicles. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to support the delivery of the following measures to improve national connectivity:

- Rail Network – Transform the rail network and improve the quality of rail services for passengers.
- Bus Network – Invest in the development of the national bus network, fully integrated with regional and local bus networks, to increase modal share of bus travel and improve access by bus to a wider range of trip destinations.
- Strategic Road Network – Invest in road improvements to reduce journey times, deliver a safer and more resilient road network, and improve air and noise quality. Create a network of rapid charging points to enable longer distance travel by electric vehicles throughout Wales.
- National Cycle Network - Revitalise the National Cycle Network to create a network of traffic free paths connecting cities, towns and countryside across Wales.

- 5.16. Policy 12: Regional Connectivity encourages a modal shift away from the private car by incorporating measures that encourage active travel and the use of public transport. 20 miles per hour is identified as the default speed limits for most streets.

5.17. Policy 31: South Wales Metro policy offers support for the development of a metro within the South West Wales region. Local Development Plans and the Strategic Development Plan are also encouraged to do the same.

5.18. Local planning authorities are encouraged to support development close to metro hubs that is higher density, mixed use, and car-free. Throughout the document there is reference to the role railway stations can play as community hubs. Land is reserved outside of the site boundary for consideration by Welsh Government for a metro station.

5.1. Policy 13: Supporting Digital Communications states that developments should include the provision of Gigabit capable broadband infrastructure from the outset.

Sustainability

5.2. Policy 16: Heat Networks sets a requirement for an Energy Masterplan to accompany proposals for strategic level mixed-use development. The threshold set is 100 homes.

NPTCBC Local Development Plan (LDP) 2011-2026

5.3. The NPTCBC Local Development Plan (LDP) 2011-2026 was adopted in 2016. It guides the future development of the area, providing a clear vision which sets out where, when and how much new development can take place over the plan period. The LDP sets out the vision, objectives and strategy to achieve this.

5.4. The following policies are considered to be relevant to the determination of the planning application:

- Policy SP1: Climate Change
- Policy SP2: Health
- Policy SP3: Sustainable Communities
- Policy SP4: Infrastructure
- Policy SP7: Housing Requirement
- Policy SP8: Affordable Housing
- Policy SP12: Retail
- Policy H1: Housing Sites

- Policy AH1: Affordable Housing
- Policy EC1: Employment Allocations
- Policy EC3: Employment Area Uses
- Policy SRA1: Coed Darcy Strategic Regeneration Area
- Policy SP15: Biodiversity and Geodiversity
- Policy SP16: Environmental Protection
- Policy EN8: Pollution and Land Stability
- Policy SP20: Transport Network
- Policy TR1: Transport Proposals
- Policy TR2: Design and Access of New Development
- Policy SP21: Built Environment and Historic Environment
- Policy SP10: Open Space
- Policy OS1: Open Space Provision
- Policy OS2: Protection of Existing Open Space
- Policy BE1: Design
- Policy SP18: Renewable/Low Carbon Energy
- Policy SP19: Waste Management
- Policy SP17: Minerals
- Policy M1: Development in Mineral Safeguarding Areas
- Policy W3: Waste Management in New Developments

Material Considerations

- 5.5. There are a number of material considerations and guidance documents published by NPTCBC and the Welsh Ministers. A number of these are now dated and their weight therefore varies accordingly. Commentary on these documents is made where appropriate within this Statement, and the wider planning application documentation.

Planning Policy Wales 11

- 5.6. PPW (Edition 11), which was adopted in February 2021, represents the latest change to PPW since it was first published in May 1996 and entirely rewrites and restructures Edition 9 in the context of the Well-being of Future Generations (Wales) Act 2015.
- 5.7. PPW11 has an over-riding objective to accommodate current and future needs and seeks to maximise delivery of outcomes against all aspects of well-being and sustainable development, set to be achieved by adopting a placemaking approach. The concept of placemaking introduced in the PPW is considered a key element to deliver the aspirations of the Act and drive plan-making and development management decisions.
- 5.8. 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 and the Well-being of Future Generations (Wales) Act 2015. The key planning principles are set out in this document are:
- Growing the economy in a sustainable manner
 - Making the best use of resources
 - Facilitating accessible and healthy environments
 - Creating and sustaining communities
 - Maximising environment protection and limiting environment impact
- 5.9. PPW11 establishes the key principles of the planning system and how development should be shaped to deliver the best possible outcomes.

Technical Advice Notes (TANs)

- 5.10. The Technical Advices Notes (TANs) supplement Future Wales and PPW11. TANs provide supplementary policy principles and add more detailed content on how a range of issues might affect the development potential of the site. The following TANs are considered relevant to the proposals at Coed Darcy:
- TAN 2: Planning and Affordable Housing (2006)
 - TAN 4: Retail and Commercial Development (2016)
 - TAN 5: Nature Conservation and Planning (2009)

- TAN 11: Noise (1997)
- TAN 12: Design (2016)
- TAN 15: Development, Flooding and Coastal Erosion (2021)
- TAN 16: Sport, Recreation and Open Space (2009)
- TAN 18: Transport (2007)
- TAN 20: Planning and the Welsh Language (2017)
- TAN 21: Waste (2017)
- TAN 23: Economic Development (2014)
- TAN 24: Historic Environment (2017)

Well-being of Future Generations (Wales) Act 2015

5.11. The Well-being of Future Generations Act places a duty on public bodies to carry out sustainable development. The Act requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.

5.12. The Well-being of Future Generations Act contains 'Five Ways of Working' which public bodies are required to demonstrate in undertaking their sustainable development duty. Giving consideration to these ways of working is an intrinsic part of the planning system. It will be for each decision making body to demonstrate how they have operated in this manner. These 'Five Ways of Working' are set out as follows:

- Collaboration
- Prevention
- Long Term
- Integration
- Involvement

Supplementary Planning Guidance (SPGs)

5.13. Supplementary Planning Guidance (SPGs) will be taken into account as material considerations. A number of SPGs have been produced by NPTCBC on various topics. The following ones are considered relevant to this proposal:

- Planning Obligations (2019)

- Affordable Housing (2016)
- Landscape and Seascape (2018)
- Open Space & Green Space (2017)
- Biodiversity & Geodiversity (2018)
- Pollution (2016)
- Renewable & Low Carbon Energy (2017)
- Parking Standards (2016)
- Design (2018)
- Schedule of Buildings of Local Importance (2019)
- Development & the Welsh Language (2017)

Local Plan Update and Emerging Policy

- 5.14. The existing local plan was adopted in 2016 and in accordance with guidance, the four year full review of the plan commenced in January 2020 with the publication of the Draft Review Report. This Report provided an overview of the key issues to be considered when taking the existing LDP forward and set out areas where changes may be required. However, it did not detail changes that should be made to the plan, as the detail and extent of changes will be identified through the preparation of the Replacement Local Development Plan (RLDP).
- 5.15. The Draft Review Report was subject to a 6 week public consultation period from 3rd February to the 16th March 2020. The responses to the comments received were presented for consideration at a meeting of Full Council on 2nd July 2020; with members approving the final Review Report (July 2020) for publication.
- 5.16. At the time of writing this statement, the Draft Delivery Agreement is currently out for consultation which sets out a timetable for delivering the RLDP. According to this draft timetable, work will start in 2022 with adoption planned for 2025.

6. Planning Assessment

6.1. This section of the Planning Statement outlines the planning considerations relevant to the determination of this outline application. It is split into two sub-sections as follows:

- 1) the principle of development; and
- 2) compliance with development management policies.

The Principle of Development

6.2. The principle of the development at Coed Darcy has long been established. The site was originally granted planning permission in 2008 and has featured in two local plan iterations since the site was decommissioned by BP in 1998.

6.3. The statutory development plan for the area comprises the NPTCBC LDP (2016) and Future Wales (2021). A number of policies within the NPTCBC LDP support development at the site, most prominently Policy SRA1 which designates Coed Darcy as a Strategic Regeneration Area for the development of an urban village supported by allocations for housing (4,000 dwellings, 2,400 of these within the plan period) as well as employment space.

6.4. The allocation covers a wider area than the currently application proposals and hence the allocation for 4,000 dwellings. This outline application includes only the central and northern parts (north of the rail line) of the allocation and therefore proposes a scale of development commensurate with the land within the application boundary. The quantum and approach to employment space has been carefully considered given the current context and are justified by the Employment Assessment submitted in support of the planning application. Employment provision within the site is therefore consistent with up to date evidence of market demand.

6.5. The principle of development is further supported by policies set out in Future Wales (2021), principally, Policy 28 which identifies Neath as part of a 'national growth area' where the aim to provide 25,600 homes over the plan period, as well as Planning Policy Wales 11.

Compliance with Development Management Policies

- 6.6. The application proposals comply with the adopted Development Plan development management policies, and where relevant national policy and guidance. We consider these in turn below:

NPTCBC – Policy SRA1

- 6.7. Policy SRA1 sets out the spatial vision for Coed Darcy. The policy states that Coed Darcy is a Strategic Regeneration Area for the development of an urban village comprising the following allocations:

Reference	Use	Size
H1/LB/5	Residential	4,000 units, 2,400 within the plan period.
EC1/3	B1 Business	41,200 sqm

- 6.8. As part of the proposals submitted with this application, up to 2,000 of the dwellings can be supported within the illustrative masterplan. The application proposals include only the central and northern part of the site and therefore provide for a considerably smaller scale of development than was envisaged in the adopted development plan. The development does not however prejudice the delivery of the southern part of the allocation should that come forward for development in the future.
- 6.9. An Employment Report has been submitted with the application which confirms that there is not a need for the levels of employment space outlined within the policy wording for a number of reasons including; the location near to Swansea and the effects of the 2020 pandemic. A reduced quantum has therefore been provided in accordance with this up to date evidence.

- 6.10. Wider Development Plan Compliance

Element	Policies	Compliance
Ecology	NPTCBC Local Plan: EN6 EN7	The site has been subject to a number of ecological surveys by Ecology Solutions between June 2020 and September 2021, with these surveys including habitat work to ascertain the general ecological value of the land contained within the boundaries of the

Element	Policies	Compliance
		site and to identify the main habitats and associated plant species, with notes on fauna utilising the site. In addition, a suite of targeted protected species surveys were completed, the scope of which were discussed and agreed in principle with NPT Council. The creation of a variety of new wetland habitats, extensive dry grassland, Open Mosaic Habitat and new woodlands, as well as the bolstering of existing habitats will enhance biodiversity on the site. The principles and design aspirations for these new habitats will be detailed within the Framework Landscape and Ecological Mitigation Plan (LEMP). Full details of the ecology work are included in the Biodiversity ES chapter and other supporting documents.
Landscape	NPTCBC Local Plan: Objective 15 PPW11	The Coed Darcy site is currently a post-industrial, brownfield, transitional landscape. Objective 15 to <i>'conserve NPTs important landscapes, countryside ... important wildlife, habitats and geodiversity sites, ensuring that developments throughout the County respect all landscapes and minimise adverse impacts,'</i> has been central to the development of the application proposals. The Green Infrastructure (GI) led masterplan, identifies the important habitats to conserve and enhance, and provides the opportunity to enhance and diversify the derelict portions of this post-industrial site, integrating sustainable development with existing and new Green Infrastructure assets for wildlife and residents. In relation to PPW 11, the development approach has equally embraced the principles and objectives to <i>'contribute towards the delivery of sustainable development and improve the social, economic, environmental and cultural well-being of Wales'</i>, by the protection of the most valuable habitats and Green Infrastructure (GI) assets on the site, developing a GI Constraints and Opportunities led masterplan, with the opportunity to integrate development within the wider landscape, and contributing to the sustainable, green future of the community with habitat

Element	Policies	Compliance
		enhancement, interpretative and recreational GI opportunities for all.
Flood Risk/Drainage	NPTCBC Local Plan: ST03 SABS NRW: Zone A, zone C2 of DAM maps	In accordance with Policy ST03, the proposed built form is located outside of the maximum peak flood extents identified within Natural Resources Wales (NRW) Flood Risk from Rivers and Seas mapping. Further to this, the majority of the site, lies within Zone A of the Development Advice Mapping (DAM) which is considered the most appropriate area for development with regard to flood risk, with only a small localised area to the south west of the Site lying within DAM Zone C2. The Flood Consequence Assessment confirms that this remains the case in the future year plus the relevant climate change scenario. The site will implement a sustainable surface water drainage strategy, which will incorporate a range of attenuation features (e.g. swales, basins and ponds) and conveyance features (e.g. swales, filter drains and pipes). This strategy aims to mimic the existing pre-development, greenfield conditions with outfalls to the Crymlyn Bog, the North Site Reservoir, and the existing DCWW drainage network surrounding the Site., all at attenuated rates. The Surface Water Drainage Strategy has been designed in accordance with the key principles of “<i>Sustainable Drainage Systems Standards for Wales</i>” (SDSSW) (2018) and, following discussions with the local SuDS Approving Body (SAB), it is proposed that SAB applications will be made at the detailed design stage of each phase. Full details can be found in the Drainage Strategy and the Flood Risk Assessment submitted in support of the application as well as in the Water Environment ES chapter.
Ground Conditions	NPTCBC Local Plan: EN8 M1	The works associated with Ground Conditions proposed as part of the outline application will build on the extensive intrusive investigation and targeted remediation already completed. Based on a fixed masterplan and proposed final ground levels, assessments will be undertaken using updated risk-based criteria

Element	Policies	Compliance
		to determine whether there are unacceptable risks to human health in the finished development from residual contamination which may require remediation. The updated risk-based criteria will allow for the sustainable retention and re-use of materials whilst providing safe conditions for future residential occupation. The proposed works will also include assessment of current groundwater quality to determine the risks to identified receptors and to ensure appropriate mitigation is implemented to manage the potential impacts on sensitive off-site receptors in the long term. In addition, further intrusive investigation will establish the engineering properties of the ground to inform foundation design and ensure that ground stability or other geotechnical constraints are suitably mitigated. Consideration has been given to the presence of mineral resources at the site and the anticipated impacts and effects of the proposed development. Further details can be found in the Phase 1 Geo-environmental Desk Study and Ground Conditions ES chapter submitted in support of the application.
Energy	NPTCBC Local Plan: SP3 Future Wales: Policy 16	Energy and Sustainability Statements are submitted in support of the application which provide a high level strategy for the reduction of energy use on the application site; with the details to come forward through future reserved matters.
Climate Change	NPTCBC Local Plan: SP1 Future Wales: Throughout	The application site represents a sustainable location for development – in a location identified for development at both local and national level. The greenhouse gas emissions of the project have been calculated with the available outline detail. This has identified the “hot spot”

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Element	Policies	Compliance
		areas for emissions. These in turn inform recommendations to minimise emissions for the next stage of detailed design. Dependence on the private car has been considered within the design. Cycle paths and active travel routes have formed a significant part of the proposed development and every residential property will be set up to allow Electric Vehicle charging. Where possible, PV charging will be considered for suitable buildings and building design, location and orientation will be used to maximise PV energy generation. Full details can be found in the Climate Change chapter of the ES and the Energy Strategy submitted in support of this application.
Design	NPTCBC Local Plan: BE1	The application is submitted in outline, and as such, establishes design parameters for any future detailed consent/s. As set out in the Design and Access Statement, the proposals have been informed by analysis of the surrounding characteristics and the context of the site, and establish the principles to deliver a high quality, distinctive scheme. The proposals have been designed in accordance with the requirements of Policy BE1 in relation to good design, along with appropriate scale, density, massing, heights and layout. Part II of the Design & Access Statement sets out the process for the preparation of detailed designs for the reserved matters applications. It is envisaged that this process will be conditioned to the outline permission to ensure the high quality aspirations established through the outline application are followed through at the detailed design stage.
Transport	NPTCBC Local Plan: SP4 SRA1 SP20 TR1	The Transport Assessment confirms that any impacts from the development can be successfully mitigated. Details of the primary site access are not reserved, and a preliminary design is included for approval as part of this planning

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Element	Policies	Compliance
	TR2 Future Wales: Policy 11 Policy 12	application. This provides a safe and suitable access for the proposed development. The Movement and Street Hierarchy Plan provides for the retention of existing routes, alongside the delivery of new pedestrian and cycle routes, and a comprehensive street hierarchy to inform future detailed proposals. Improved footpath and cycle links around the whole site open up much of the area to the public for the first time. This will sit alongside new signage and cycle parking provision in the retail and commercial areas. The Transport Assessment and associated Framework Travel Plan submitted in support of this application, explain how the proposals maximise the opportunities for sustainable travel from the site to key destinations.
Amenity; Environmental Protection	NPTCBC Local Plan: EN8 Future Wales: Policy 9	An Air Quality Assessment is submitted with the planning application which confirms that the impact of the development on NO₂, PM₁₀ and PM_{2.5} concentrations at sensitive receptors would be negligible, and these would remain below relevant NAQOs both with and without the proposed development. There are no relevant ecological receptors within the 200m of a road affected by changes in traffic as a result of the proposed development area. Further information on this can be found in the Air Quality chapter of the ES. A Noise Impact Assessment is included with this submission as part of the ES, and confirms that the proposed development will not result in unacceptable noise levels at neighbouring existing properties, with levels below the upper guidance levels. A noise barrier is proposed either side of the site entrance in order to reduce the noise levels further. Mitigation is also proposed in the

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Element	Policies	Compliance
		northern part of the site. This is explained in detail in the ES Chapter relating to noise. The DAS confirms that the development will deliver acceptable relationships with existing residential development which borders the site.
Open Space	NPTCBC Local Plan: SP10 OS1 OS2	The development proposals meet the requirements of Policy SP10 by ensuring adequate access to public open space for all residents of the new development.
Waste	NPTCBC Local Plan: SP19 W3	A Construction Environmental Management Plan (CEMP) will be prepared at the appropriate time to manage waste generated through the construction process.
Housing	NPTCBC Local Plan: SP7 H1 AH1 Future Wales: Policy 1 Policy 2 Policy 28	The proposed development will provide a range of housing sizes, tenures and types: including flats and housing. Whilst the precise housing mix will be determined at the reserved matter stage, the Illustrative Masterplan indicates how a range of housing sizes and types could be delivered across the site.

7. Summary & Conclusions

- 7.1. The Coed Darcy development proposals contained within this outline planning application present an outstanding opportunity to deliver a mixed-use new community through the regeneration of a substantial previously developed site. The proposals have been carefully designed to contain the range of uses needed to support a thriving new community, whilst ensuring that the development is viable and ultimately deliverable. It is crucial that this new chapter in the planning of Coed Darcy presents a solution that enables the aspirations of the applicant and the authority to be delivered.
- 7.2. The preceding section of this Statement outlines the planning case in support of the application proposals. It explains the very significant benefits to granting planning permission and enabling delivery of up to 2,000 residential dwellings along with employment, commercial and retail space as well as related infrastructure and public open space on the application site. In summary, the benefits are as follows:
- The delivery of the development would provide housing for the local community in a sustainable location, adjacent to the built up area.
 - This proposal presents a viable means of delivering a large part of the land allocated for development in the adopted development plan and delivers a proportion of the strategic housing requirement for NPTCBC, widening the choice of high-quality homes.
 - The development will deliver a proportion of affordable housing which would be available to meet the needs of local households who could not afford to buy or rent on the open market.
 - The application proposals are consistent with the objective of the Welsh Ministers to boost housing delivery and support economic growth.
 - The application proposals integrate cohesively with phase 1 of the development.
 - Excellent pedestrian, cycling and public transport connectivity is provided from the site to key designations in the wider area supporting active travel objectives.
 - Land safeguarded for the provision of new Metro station to come forward in the future, delivered by Welsh Government/Transport for Wales.
 - If required, expansion land is available for the primary school to become a through school, further increasing the sustainability credentials of the site.

- The development will be set within an attractive landscape setting, through the establishment of a high-quality public realm that is served by formal and informal open spaces linked by a continuous network of landscaping. The open space created will provide an opportunity for play and for general amenity.
- The site is not subject to any environmental or technical constraints to delivery which cannot be overcome/mitigated.
- The development would introduce strategic and on-plot water attenuation which would reduce run-off rates from the development to an acceptable level.
- Opportunities for apprenticeships, work experience and training can be delivered.

7.3. The development proposals are consistent with the relevant policies of the development plans. Furthermore, the combination of these benefits must be attributed substantial weight in the determination of the planning application. In accordance with national legislation, policy and guidance, planning permission should be granted at the earliest opportunity in order to support the delivery of this important allocated site.