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PLANNING

Planning Statement

December 2022

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1 Introduction

- 1.1 This Planning Statement (PS) has been prepared by KEW Planning, on behalf of Linc Cymru, to support and justify the proposed development of 43 new homes at the former Dyffryn Lower Comprehensive School on Devonshire Place, Port Talbot.
- 1.2 The application site falls within the administrative boundary of Neath Port Talbot County Borough Council (NPTCBC). The site location plan is provided as Appendix 1.
- 1.3 The site currently comprises vacant school buildings, with no public access.
- 1.4 This PS provides an assessment of the proposals against the provisions of the statutory Development Plan covering the site, the Planning Policy Wales framework and other material planning considerations.

The Proposed Development

- 1.5 The description of development is as follows:

“Development for 43no. affordable dwellings and associated works including a new access, an internal road network, landscaping, sustainable drainage, car and cycle parking.”

- 1.6 The proposal seeks to deliver a 100% affordable residential development within the settlement boundary of Port Talbot. The site sits within a predominantly residential area, located a short distance from Talbot Road, which hosts a range of amenities; as such, it is within an attractive and accessible location in Port Talbot.
- 1.7 This brownfield site has been derelict since the former Dyffryn Lower Comprehensive School site and buildings were fully vacated in 2018, meaning its sustainable and accessible location is currently significantly underutilised.
- 1.8 Further to submission of a request for pre-application advice, a pre-application response was received on 11 August 2022 (see [Appendix 2](#)). The response was supportive of the proposed development, and pointed out technical considerations that the project team has taken into account while progressing the design to its final form.
- 1.9 The statutory Pre-Application Consultation took place from 28th October to 25th November 2022, with a public exhibition held on 8th November.

Linc Cymru

- 1.10 Linc Cymru is a Housing Association and Care provider, focused on building homes and environments that improve people's quality of life and create a prosperous and healthier Wales. Linc Cymru is committed to creating great places for people to live and flourish, now and in the future.

The Planning Application Documents

- 1.11 This application package comprises the following:

- Drawings (ref nos. 10249 PL1, 10249 PL2, 10249 PL3, 10249 PL10, 10249 PL23, 10249 PL30, 10249 PL31, 10249 PL32, 10249 PL35, 10249 PL37, 10249 PL38 and 10249 PL39), prepared by Roberts Limbrick Architects
- Design and Access Statement, prepared by Roberts Limbrick Architects
- Planning Statement, prepared by KEW Planning
- Pre-Application Consultation Report, prepared by KEW Planning
- Transport Statement, prepared by Apex Transport
- Landscaping Design Statement, prepared by Austin Smith Lord
- Drainage Strategy, prepared by Jubb
- Arboricultural Report (Tree Survey Data & Tree Constraints Plan, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement, prepared by KEW ArbTS - Arboricultural Technician Services Ltd
- Ecological Assessment Report, including bat roost inspection and three dusk/dawn bat activity surveys prepared by Pure Ecology
- Air Quality Report, prepared by Redmore Environmental
- Thermal Comfort Report, prepared by Services Design Solution Ltd
- Low & Zero Carbon Technology Appraisal Feasibility Report, prepared by Services Design Solution Ltd
- M&E drawing nos. 06485B-SDS-EX-XX-DR-N-3716-01, 06485B-SDS-EX-XX-DR-N-3716-02, 06485B-SDS-XX-XX-TL-N-1090-01, 06485B-SDS-XX-ZZ-SK-N-9020-01, 06485B-SDS-XX-ZZ-SK-N-9020-02, 06485B-SDS-XX-ZZ-SK-N-9020-03, 06485B-SDS-XX-ZZ-SK-N-9020-11, 06485B-SDS-XX-ZZ-SK-N-9020-21, 06485B-SDS-XX-ZZ-SK-N-9020-31, 06485B-SDS-XX-ZZ-SK-N-9020-41, 06485B-SDS-XX-ZZ-SK-N-9020-51.

Statement Structure

1.12 This PS is set out as follows:

- **Section 2** – provides a description of the site and surrounding area;
- **Section 3** – summarises the planning history records of the site;
- **Section 4** – summarises the relevant national and local planning policies, and other material considerations;
- **Section 5** – describes the proposed development;
- **Section 6** – provides justification for the proposed development; and
- **Section 7** – set outs the conclusions.



2 The Site and Surrounding Area

- 2.1 This section reviews the prevailing conditions of the existing site and the surrounding area, which are material factors when assessing the suitability of the proposed development.

The Site

- 5.1 The site is almost triangular in shape and measures 0.8 ha in size (refer to [Figure 1](#)). The parcel of land is constructed of hard standing and includes multiple school buildings, including classrooms, a canteen, and physical education facilities (refer to [Figures 2, 3, 4, 5 and 6](#)). The school's main building is a two-storey, stone building with a pitched roof, meaning certain elements of the building can be read as 3-storeys in height. The site varies in levels slightly (refer to [Figure 7](#)) and has several mature trees on its south-eastern boundary, as well as areas of overgrown shrubbery (refer to [Figure 8](#)). The site currently has only limited areas of soft landscape, and large areas of tarmac between the footprint of the school buildings.
- 2.2 This site was occupied by the Dyffryn Lower Comprehensive School until its closure in 2018, and has since been vacant. The school was closed as it was surplus to requirements, but it is still famous for having taught famous actors such as Richard Burton and Michael Sheen.
- 2.3 The site is located within the settlement boundary, and is bound to the north, east and south by terraced housing, and to the west by Central Junior School.



Figure 1 - Site Location



Figure 2 – Existing school buildings (looking west)



Figure 3 – Existing school buildings (looking northeast)



Figure 4 – Existing school buildings (looking north)



Figure 5 – Existing school buildings (looking east)



Figure 6 – Existing school buildings (looking south)



Figure 7 – View of the site's change in levels



Figure 8 – Mature trees situated in the site's south-eastern corner

- 2.4 The boundary treatment comprises a combination of railings and a stone wall (circa 3m in height) due to its former use as a school, combined with vegetation and trees along its eastern and southern boundaries.
- 2.5 The site does not include a vehicular access point or car parking provision as the former school provided pedestrian access only, situated at multiple locations along the site boundaries (one of which can be seen in [Figure 3](#)).

Arboricultural considerations

- 2.6 The site currently accommodates 15 trees and a group of two small apple trees to the north-west of the site. The majority of these trees are of moderate quality, with 2 being of high, 3 of low and 1 of poor quality (seen in [Figure 8](#)).
- 2.7 All the trees are located along the boundary of the site, with a larger concentration in the southern corner. A Tree Preservation Order has been served and NPT are in the process of seeking TPO the group of trees in the southern corner.

The Surrounding Area

- 2.8 The immediate surrounding area is predominantly residential in character, with rows of two-storey terraced housing surrounding the site, however the wider surrounding area is urban in nature. The site is located approximately 91m north of Talbot Road (A48), which is the main thoroughfare through Port Talbot. This road is home to many local amenities, including ALDI supermarket, hairdressers, cafes, and a Rugby Club. Further north of this is Port Talbot town centre, located approximately 0.4 miles north of the site, which includes amenities such as Tesco Superstore, Aberafan Shopping Centre, Princess Royal Theatre, and a Post Office.

- 2.9 Beyond the terraced housing to the east of the site is the M4 and other local amenities including Aberavon Rugby Club and Talbot Memorial Park. The M4 connects the site to other cities such as Swansea and Cardiff, as well as other locations in England (such as Bristol and London).
- 2.10 Beyond the terraced housing and Talbot Road to the west of the site is Harbourside Business Park, which includes a number of employment-related uses such as LBS Builders Merchants, HMCTS Port Talbot Justice Centre, TWI Engineering, and DWE Hydraulics and Pneumatics. Further south of this is Port Talbot steelworks, which includes a large area of employment-related land used by factories and industrial companies.
- 2.11 Bus stops are located 0.1 miles south of the site (Abbey Road) and 0.1 miles northwest of the site (Talbot Road). Port Talbot Parkway railway station is also within a short walking distance from the site, approximately 0.3 miles northwest of the site, equating to a 5-minute walk or 1-minute cycle journey. This connects the site to the rest of the UK by sustainable modes of transport.
- 2.12 The above demonstrates that there are a multitude of amenities within walking distance of the site, including shops, schools, restaurants and medical facilities.

Flood Risk Considerations

- 2.13 The development site lies within Flood Zone A, as identified within the Natural Resource Wales (NRW) Development Advice Map (DAM), illustrated in [Figure 9](#). Notwithstanding this, NRW has confirmed that the DAM supporting the extant Technical Advice Note (TAN) 15: 'Development flooding and coastal erosion' is out of date as no updates have been made for over 2 years and no future updates are expected. The Flood Map for Planning (FMfP), which comes into force on 1 June 2023, therefore constitutes the best available spatial information on flood risk and is being updated every 6 months.

2.14 In accordance with the FMfP, the development site lies outside of Flood Zones 2 and 3 (Rivers and Sea), however very small parts of the site are within Flood Zone 2 (Surface Water), within the western and southern boundaries, as illustrated in Figure 10.

2.15 Flood risk is discussed in section 7 of this report, and the application is accompanied by a Drainage Strategy.

Map Perygl Llifogydd / Flood Risk Map -

Allwedd / Map Key

- Zone C1
- Zone C2
- Zone B
- Zone A

Graddfa / Scale at A3 1:4,999

Dyddiad / Date
01/06/2022



0.3 0 0.13 0.3
Kilometers
British_National_Grid

Figure 9 – NRW Development Advice Map

Flood Map for Planning Flood Map for Planning

Legend

TAN15 Defended Zones

TAN15 Defended Zones

	Rivers	Rivers
	Sea	Sea
	Rivers and Sea	Rivers and Sea

Rivers and Sea

Rivers and Sea

	Flood Zone 3	Flood Zone 3
	Flood Zone 2	Flood Zone 2

Surface Water and Small Watercourses

Surface Water and Small Watercourses

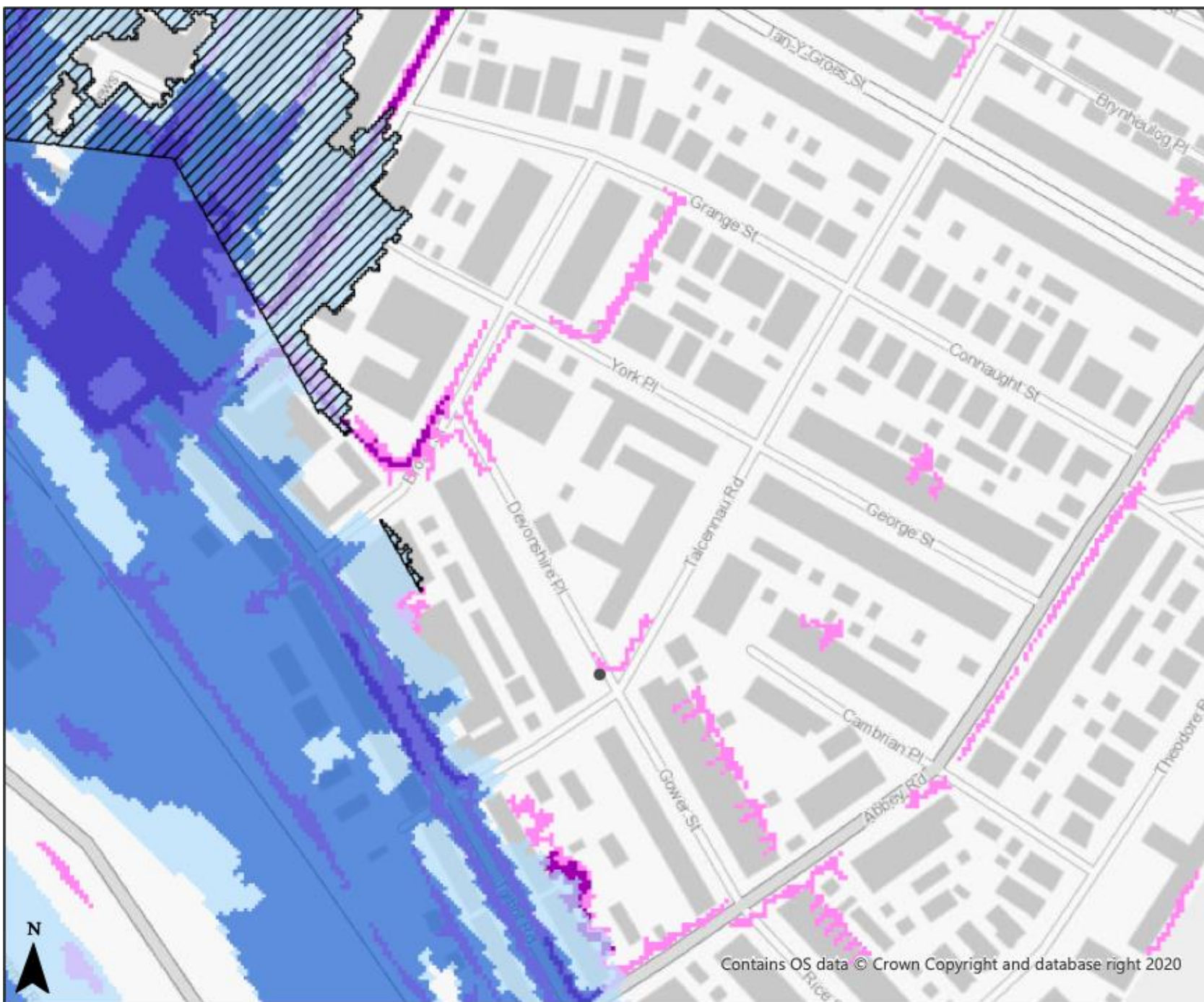
	Flood Zone 3	Flood Zone 3
	Flood Zone 2	Flood Zone 2

Recorded Flood Extents

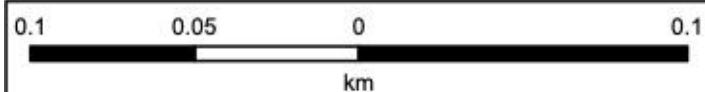
	Recorded Flood Extents
--	------------------------

Scale: 1:2,500

Date: 01/06/2022



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British National Grid

Figure 10 – NRW Flood Map for Planning



3 Planning History

3.1 This chapter summarises the planning history of the site, both in terms of historic records and recent developments, which are material considerations for this planning application.

Statutory online planning register

3.2 Research of the statutory online planning register has revealed 1 planning application for the site, dated 2004.

3.3 Table 1 summarises the planning history records for the site.

Table 1 – Planning History Records

No	Reference	Address	Description of Development	Decision	Date
1	P2004/1313	Corner of Devonshire Place / Talcennau Road Port Talbot SA13 1SG	Post Person security container for short term storage of mail prior to dwelling.	Approved	9 December 2004



4 Planning Policy

- 4.1 This chapter summarises the relevant national and local planning policy framework for this pre-application.
- 4.2 All development should be in accordance with the statutory development plan, unless material considerations indicate otherwise, as required by s36 of the Planning and Compulsory Purchase Act 2004. In this context, the statutory development plan for NPTCBC is NPTCBC Local Development Plan (LDP), adopted in January 2016. Other material considerations that should be considered are local Supplementary Planning Guidance (SPGs).
- 4.3 National planning guidance is also a material consideration, specifically Planning Policy Wales Edition 11 2021 (PPW11), Future Wales: The National Plan 2040, and Technical Advice Notes (TANs).

Site designation

- 4.4 The application site is afforded the following designations:
- SC1 – Settlement Limit (Port Talbot)
 - SP5 – Coastal Corridor Strategy Area



KEY

Settlement Limit (SC1)



Coastal Corridor Strategy Area / Valleys
Strategy Area (SP5 & SP6)



Settlement Protection Zone (M2/1)



H1/LB/22

Figure 11 – Extract from LDP Proposals Map, site shown in red

National Planning Policy

4.5 Regard has been had to the Government's PPW11 and the relevant TAN documents:

- Planning Policy Wales Edition 11 (2021)
 - Paras 3.3 to 3.17 (Good Design Making Better Spaces)
 - Paras 3.19 and 3.23 (Promoting Healthier Places)
 - Paras 3.49 to 3.52 (Accessibility)
 - Paras 3.55 and 3.56 (Previously Developed Land)
 - Paras 4.1.9 to 4.1.18 (Sustainable Transport)
 - Paras 4.1.19 to 4.1.35 (Active and Social Streets)
 - Paras 4.1.36 to 4.1.39 (Public Transport)
 - Paras 4.1.49 to 4.1.54 (Car Parking)
 - Paras 4.1.55 and 4.1.56 (Transport Assessments)
 - Paras 4.2.1 to 4.2.34 (Housing)
 - Para 4.4.1 (Community facilities)
 - Para 4.5.1 (Recreational spaces)
 - Paras 5.8.1 to 5.8.3 (Sustainable Buildings)
 - Paras 5.11.1 to 5.11.3 (Making Best Use of Material Resources and Promoting the Circular Economy)
 - Para 5.12.1 (Design Choices to Prevent Waste)
 - Para 5.12.6 (Design in Locally Sourced, Alternative or Recycled Materials)
 - Para 6.2.1 to 6.2.3 (Green Infrastructure)
 - Para 6.2.5 (Integrating Green Infrastructure and Development)

- Para 6.3.12 to 6.3.17 (Characteristics of Local Landscapes)
- Paras 6.4.15, 6.4.17, 6.4.18 and 6.4.21 to 6.4.25 (Biodiversity and Ecological Networks)
- Paras 6.6.8, 6.6.17 to 6.6.20, 6.6.24, 6.6.25 and 6.6.27 (Water and Flood Risk)
- Paras 6.7.6 and 6.7.8 (Framework for Addressing Air quality and Soundscape)
- Paras 6.9.16 to 6.9.21 (Land Contamination)
- Future Wales: The National Plan 2040
 - Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
 - Policy 7 - Delivering Affordable Homes
 - Policy 9 - Resilient Ecological Networks and Green Infrastructure
 - Policy 12 - Regional Connectivity
- Welsh National Marine Plan (2019) (WNMP)
- Technical Advice Notes
 - TAN 2 – Planning and Affordable Housing
 - TAN 5 – Nature Conservation and Planning
 - TAN 11 – Noise
 - TAN 12 – Design (2016)
 - TAN 15 – Development and Flood Risk (2004)
 - TAN 16 – Sport, Recreation and Open Space
 - TAN 18 – Transport (2007)
 - TAN 20 – Planning and the Welsh Language (2017)

- TAN 24 – The Historic Environment (2017)

Local Planning Policy

4.6 The following policy documents have informed the proposal:

- NPTCBC LDP (Adopted January 2016)
 - Policy SP1 – Climate Change
 - Policy SP2 – Health
 - Policy SP3 – Sustainable Communities
 - Policy SP7 – Housing Requirement
 - Policy SP8 – Affordable Housing
 - Policy SP10 – Open Space
 - Policy SP15 – Biodiversity and Geodiversity
 - Policy SP16 – Environmental Protection
 - Policy SP18 – Renewable and Low Carbon Energy
 - Policy SP19 – Waste Management
 - Policy SP20 – Transport Network
 - Policy SP21 – Built Environment and Historic Heritage
 - Policy SC1 – Settlement Limits
 - Policy SC2 – Protection of Existing Community Facilities
 - Policy I1 – Infrastructure Requirements
 - Policy SP5 – Development in the Coastal Corridor Strategy Area

- Policy H1 – Housing Sites
- Policy AH1 – Affordable Housing
- Policy OS1 – Open Space Provision
- Policy RE2 – Renewable and Low Carbon Energy in New Development
- Policy W3 – Waste Management in New Development
- Policy TR2 – Design and Access of New Development
- Policy BE1 – Design
- Policy WL1 – Development in Language Sensitive Areas
- Policy EN6 – Important Biodiversity and Geodiversity Sites
- Policy EN7 – Important Natural Features

4.7 There are also a number of SPG documents which are material considerations for this proposal, including the following:

- Affordable Housing (October 2016)
- Parking Standards (October 2016)
- Planning Obligations (October 2016)
- Design (July 2017)
- Biodiversity and Geodiversity (May 2018)
- Pollution (October 2016)
- Open Space and Greenspace (July 2017)

Local Planning Policy – Replacement NPT LDP

- 4.8 A Delivery Agreement for the preparation of the Replacement LDP (RLDP) was approved by Welsh Government on 11th January 2022, allowing NPTCBC to formally commence preparation of the RLDP. In accordance with the Delivery Agreement, the RLDP will be adopted in July 2025.



5 The Proposed Development

- 5.2 This section of the report outlines the details of the development proposals. Further details are set out in the technical reports accompanying this pre-application.
- 5.3 The proposal will make efficient use of a brownfield site, which is situated in an extremely sustainable and accessible location. Existing dwellings front the site on three boundaries, meaning its derelict state currently detracts from the overall character and appearance of the area. The proposed development will therefore make use of an extremely sustainable, brownfield site through introducing much-needed affordable housing within the area.

Description of development

- 5.4 The formal description of development is as follows:

“Development for 43no. affordable dwellings and associated works including a new access, an internal road network, landscaping, sustainable drainage, car and cycle parking.”

Layout

- 5.5 The proposed layout is demonstrated in [Figure 12](#) overleaf. The layout aims to integrate the site with its surroundings through ensuring the proposed dwellings front the adjacent streets, subsequently creating an active frontage for the proposed development. The layout retains the existing trees within the south-eastern corner and incorporates an area of public open space for use by future residents as well as existing neighbouring residents.



Figure 12 - Proposed Site Layout, extract from drawing ref. 10429 PL03 rev.D

- 5.6 The proposed layout comprises two main elements, the residential development and the area of public open space. The residential development takes the form of 2-storey terraced houses, 2-storey walk-up apartments, and 2no. 3-storey apartment blocks situated within the south-eastern corner. The scale of the apartment blocks is intentionally modest, and they are set within the site so as to not overshadow neighbouring properties or alter the scale of the area. The units located along the perimeter of the site front onto the existing roads, replicating and responding to the terraced streetscape conditions of the area.
- 5.7 As part of the proposal, the an existing building situated on the boundary of Devonshire Place will be retained and converted into residential accommodation (3 bedroom bungalow). This is a key building to retain as it forms part of the boundary wall, a defining aspect of the site, and will provide the focal point upon entry to the site.
- 5.8 The proposed area of public open space, described in detail in the Landscaping paragraphs, will create a sense of place and community not only for the future residents of the site, but for the wider neighbourhood. It has been designed to seamlessly integrate with the drainage strategy for the development, and provide opportunities for biodiversity enhancements.
- 5.9 1no. new vehicular and pedestrian access is proposed from York Place. In addition, pedestrian access points are proposed from Talcennau Road, Devonshire Place, and Broad Street, providing active routes connecting the site to its surroundings. The proposed car parking is situated along the new principal road, which runs through the centre of the site. This arrangement allows the car parking to be located away from the proposed front elevations of dwellings, ensuring the development is not car-dominated.
- 5.10 The proposed routes through the site align with desire lines and provide clear visibility and legibility. The internal road hierarchy responds to the context, with a wider central road and smaller rear access roads/ paths, this also delineates the public and private realms.

- 5.11 The proposed development significantly improves the permeability of the site, which is currently inaccessible to the public due to its former use as a secondary school. At present the site is secured through boundary walls or fencing of approximately 3m in height along all boundaries, and the school buildings front the centre of the site in order to provide a sense of enclosure and safety for pupils. The proposed development would therefore improve the site's connectivity and integration with the surrounding area through incorporating pedestrian and cycle routes along all boundaries, demonstrating that these users are at the top of the movement hierarchy, providing sustainable connections to the surrounding area and seeking to create a sense of community.

Scale and Massing

- 5.12 The proposed terraced houses and walk-up flats take the form of two-storey buildings. The apartment blocks take the form of three-storey buildings, delivering a development which is in-keeping with its surrounding context, whilst also ensuring key placemaking principles are incorporated through landscaping, plus the delivery of an area of public open space, pedestrian and cycle routes. The proposed massing is appropriate in this context due to the site being largely surrounded by terraced housing, but also located in a sustainable location in close proximity to the amenities located along Talbot Road as well as Port Talbot Parkway train station.

Design and Visual Appearance

- 5.13 The proposed development forms a connection with the surrounding terraced housing, which is Victorian and Edwardian in style with several distinguishing features defining the local vernacular. The submitted DAS outlines the distinguishing features within the local area, including street formation, building form, and architectural details. The proposed development has incorporated modern interpretation of key architectural details, such as bay windows and framed openings.

- 5.14 The proposed materials will incorporate brick and render for the facades, with clay and slate tiles. The development aims to incorporate contemporary living with the site's traditional surroundings, achieved through a modern interpretation of bay windows, using simple framing around openings, full height glazing elements, square bays and crisp detailing. This ensures the development is in-keeping with the surrounding context, whilst also having its own identity and sense of place through representing an innovative and contemporary residential development.
- 5.11 The proposal will also incorporate reclaimed materials used in the existing school buildings through retaining the stone façades, existing wooden benches, and any other materials where possible. The existing building along Devonshire Place will be retained – as outlined within the proposed site plan (drawing no. 10429SCH03 Rev D) – and converted into residential accommodation. As outlined within the DAS, this is a key building to retain as it forms part of the boundary wall, a defining aspect of the site, and will provide a focal point upon entry to the site. The existing stone boundary wall, which adds character to the site's identity, will also be retained either in its current location, or within a relocated area on site. Retaining these buildings and materials demonstrate that the proposal has incorporated the site's history and heritage, creating a strong character and sense of place for the development.

Housing Mix

- 5.12 The proposed development will introduce 43 new affordable dwellings to this brownfield, vacant site within a predominantly residential area of Port Talbot. It comprises a mix of 1-, 2- and 3-bed dwellings, as demonstrated in [Table 2](#).

Table 2: Proposed Unit Mix

Unit Size	Number
1-bed flat (Common Access)	18
2-bed flat (Walk Up)	6
2-bed house	8
3-bed house	10
3-bed house (existing building)	1
	Total = 43

- 5.13 The 1-bed dwellings at ground floor level have been designed to meet Lifetime Homes standard, and to be wheelchair adaptable depending on the needs of future residents. This ensures that the development can accommodate the needs of senior residents and of residents with specific mobility requirements.

Amenity

- 5.15 The proposed terraced houses are all provided with private gardens measuring a minimum of 40sqm, and the proposed 1-bed flats within the south-eastern corner of the site are provided with private balconies measuring 5.2sqm.
- 5.16 In addition to this, residents will be able to enjoy the landscaped areas provided as part of the scheme, described in detail in the following paragraphs.

Landscaping

- 5.17 Landscaping is at the heart of the proposal. Details of the proposed landscaping scheme are set out in the Landscape Design Statement that accompanies this application, the Landscape Masterplan is shown in [Figure 13](#).
- 5.18 The landscape strategy comprises two elements: the housing area and the public open space (POS). The landscape of the housing area is designed to delineate the hierarchy of streets and spaces from the main spine road to the two courtyard spaces to the east and west. The courtyards and parking spaces off the main spine are surfaced with permeable unit pavers. A permeable resin-bounded gravel path follows the main spine to connect to the POS to the south. The roadside planting areas and house frontage planting strips are rain gardens, encouraging the infiltration of surface water and run off to support the wider surface water management strategy. Avenue and tree groups of native species, provide structure, softness and seasonal interest.
- 5.19 Easily accessible to both future residents of the scheme and the existing community, the area of POS has been designed as a key component of the development, promoting social interaction and improving the quality of life of future and existing residents alike. The structure of the space is established by the presence of the mature trees to the site boundary and the stone boundary wall itself. Railing are set into stretches of the wall. The qualities of the space are therefore already firmly established and the landscape treatment is designed to reflect and enhance the character of a glade recreating an intimate garden space.
- 5.20 The central area of amenity grass is framed by a sequence of ornamental species creating a natural boarder that also introduces ecological value. Maintenance of this space will be made by differential mowing, creating an inward oval lawn for informal play and recreation, edged with wildflower meadow.

5.21 The structural hierarchy is further extended with mixed planting borders against the housing facades and medium height native shrubs that support birds and flowering trees around the edges to screen the sub-station and bring visual seasonal interest. The paths are simple landscape elements that pick up the curvilinear lines of the lawn. The existing timber seating elements will be cleaned, treated and reinstated within the POS area. Lighting provides security and safety and extends the use of the space into the evening.



Figure 13 - Landscape Masterplan

- 5.22 In the north-west corner of the site, it is proposed to plant a mix of new trees and native shrub mix in order to mitigate the loss of existing trees (see Tree section below) and enhance biodiversity. New tree planting along the access roads and scattered planting of native shrubs will also support ecological value creation. The back gardens will be planted with rich species amenity grass and, where possible, wildflower meadow. By including native species, the planting scheme minimises maintenance requirements and offers an enjoyable outdoor area for future residents. Pollinator's species will be supported by wildflower meadow areas to enhance the habitat value, with localised pockets of rich species turf for amenity areas.
- 5.23 A new substation will be installed to the south-west of the site, set 10m away from any existing building and fenced with a palisade type. A section of the existing boundary wall will be taken down to provide access to the new substation from Devonshire Place. An existing substation will be kept in its existing location.
- 5.24 The site's landscaping is substantially improved from its existing state, and these high-quality landscaped areas will allow residents to develop a sense of community. The proposed area of public open space can be used by all members of the public, which is a vast improvement to the current situation. There is a lack of public open space in the surrounding area, with Talbot Memorial Park being the only area of green area of open space available in the vicinity of the site. The provision of an area of green open space will also assist with improving the air quality of the surrounding area, subsequently ensuring a good quality of life for future residents as well as improving the quality of life for existing neighbouring residents.
- 5.25 As explained in the Landscape Strategy that supports this application, the landscape proposals have been carefully coordinated to support the overall drainage strategy for the site. Permeable paving in the courtyards and parking areas, and resin-bounded gravel permeable footpaths in conjunction with the below ground infiltration tanks, would enable the slow percolation of rainwater into the groundwater. Planted raingardens would border parking areas and houses, designed to receive run off and feed the rainwater slowly

into the system. Species would be selected to withstand these challenging conditions, yet still provide attractive, colourful areas of planting. Finally, lawn areas and wildflower meadows would also have a role to play in providing substantial areas for infiltration and designed to accept run off from adjacent hard surfaces.

Access and Transport

- 5.26 At present, the site does not include a vehicular entrance into the site, and the primary pedestrian access is situated on the site's south-western corner (as seen in [Figure 3](#)). The proposed development will significantly improve the site's connectivity with the surrounding area through incorporating a new vehicular access from York Place on the site's northern boundary, as well as multiple pedestrian and cycle access points and walkways on all boundaries, connecting the site to the surrounding residential area in addition to the facilities located along Talbot Road and Port Talbot Parkway railway station.
- 5.27 The proposed vehicular access arrangements will comprise a simple priority junction, ensuring the internal road network is safe and usable for all. This access will also provide a pedestrian footway of 2m in width on both sides of the road, which will continue for 8m before the crossing which provides access to the footways on the west side of the site.
- 5.28 The development will incorporate 41no. car parking spaces, the majority of which will be situated along the new principal street incorporated into the development, thus minimising the presence of cars within the development itself. The proposed dwellings on the west of the site are provided with car parking spaces towards the front of the dwellings, and the proposed dwellings on the east of the site are provided with car parking spaces towards the rear of the dwellings. The parking provision provides 2no. spaces for 3-bedroom units (with the exception of units 1 and 2 which front onto Broad Street and would therefore parkin informally on-street), 1no. space for 2-bedroom units and 9no. unallocated spaces for the 18no. 1-bed flats.

- 5.29 During the Pre-Application Consultation process, the proposal included 11no. visitor parking spaces along Talcennau Road where the zig zag parking restrictions are currently placed due to the site's previous use as a school. However, in response to feedback received at the public consultation, these have been removed.
- 5.30 The proposed terraced houses are provided with cycle parking stands within the curtilage of their private gardens, and the proposed flats are provided with 6 no. cycle stands located within two locations adjacent to the flatted blocks. The location of the car parking and cycle parking provision is demonstrated in [Figure 12](#).
- 5.31 The roads exiting the principal street to the car parking provision are proposed to use shared, level surfaces within the site, promoting efficient traffic movement whilst also slowing traffic and creating a safer street environment.
- 5.32 Footways are provided on both sides of the site access from York Place and a suitable crossing provided between the two within the site. The footways link to other internal footways within the site, as well as a shared space environment which is considered safe and suitable for the movements generated by the proposals. There are also an additional pedestrian accesses located on Talcennau Road and Broad Street, and two on Devonshire Place, and as such these ensure the site has excellent permeability and connectivity with the surrounding area.

Refuse

- 5.33 Refuse and recycling storage is proposed to be located within the curtilage of the proposed terraced houses. The refuse and recycling storage for the flatted blocks is proposed to be located adjacent to the car parking provision, providing functional access for refuse collection vehicles.

Ecology

- 5.34 The Ecological Assessment Report confirms that the site is not designated for wildlife and is not immediately adjacent to statutory or non-statutory designated wildlife sites. There are no predicted impacts on designated wildlife sites. The application site as a whole is considered to be of low ecological value, due to it consisting mostly of hardstanding and buildings relating to the previous school use. There are no 'habitats of principal importance', which could provide protection to habitats that are priorities for nature conservation. Due to the site's abandoned state, plants and vegetation have started to grow around the vacant school buildings, especially within the buildings along the eastern boundary.
- 5.35 The site's south-eastern boundary, along Devonshire Place and Talcennau Road, contains a number of mature and semi-mature trees and hedgerow. This is considered the most interesting habitat features because of their size and age and will be retained as part of the proposed development.
- 5.36 The Report includes a bat roost assessment that confirms low numbers of common pipistrelle bats (*Pipistrellus pipistrellus*) are roosting in five of the eight buildings at the site. Three dusk/ dawn bat surveys (August/ September 2022) undertaken for a roost characterization assessment established the buildings support common pipistrelle 'day roosts' (i.e. non-breeding summer roosts), with individual bats or pairs of bats using external crevice features on buildings. The roost opportunities for bats are largely associated with the poor condition and damage to the buildings that is likely to have occurred following the school closure in 2018. Day roosts of common pipistrelle bat species are classified as being of low conservation significance and the loss of roosts due to demolition of the school buildings is predicted to have a negative impact at the local (site) level only.
- 5.37 There are no other significant protected species constraints, and no further surveys are required.

Trees

- 5.38 The proposal retains the mature and semi-mature trees within the site's south-eastern corner and protects their associated RPAs through locating area of public open space within this area. These trees make a positive contribution to the locality through improving the biodiversity, wildlife opportunities and air quality within the area. They will also provide a positive outlook for future residents within the flatted block as well as the residents using the area of public open space.
- 5.39 The Arboricultural Report that accompanies this planning application confirms that three trees will be removed to facilitate the construction of the proposed development. Two of these trees are small low or poor quality trees (C / U Category) and do not present a constraint on developing the site. The removal of one moderate quality tree (B Category) abutting York Place can be mitigated for by suitable compensatory tree planting on the site, as shown in the Landscape Plan.
- 5.40 A road side landscape planting area has been provided on York Place to ensure the tree amenity of the area is retained for the future.

Drainage

- 5.41 The drainage strategy for the site has been developed holistically to maximise the ecological and hydrological benefit and ensure effective durability of both.
- 5.42 It is proposed to discharge surface water run-off via infiltration soakaways. This method is considered the most viable approach given the good infiltration rated exhibited on site. For further confirmation, additional ground water monitoring will be undertaken over the winter period to ascertain the presence of groundwater on site.

- 5.43 The proposed drainage strategy is subject to approval by the SuDS Approval Body (SAB) and, as such, a Pre-SAB application has already been submitted to NPTCBC, to be followed by a full SAB Application. Subject to SABs approval, the surface water drainage is proposed to drain via SUDs features which provide treatment, to soakaway tanks and unlined raingardens to discharge via infiltration to the ground.
- 5.44 Attenuation tanks are proposed to provide storage and to also act as soakaways and have been sized to accommodate events up to and including the 1-in-100 year storm event + 40% CC, with highly conservative factors of safety. Site levels will be designed to convey overland flows away from the proposed development during exceedance events and in the event of failure, runoff will flow freely toward the permeable paving and landscaped areas. Additionally, a further precautionary fail-safe measure will be high level overflow pipes fitted on the infiltration tanks, discharging to the proposed foul sewer network, should the unlikely failure occur.
- 5.45 As explained in the Landscape section, the drainage strategy is supported by the landscape proposal, contributing to slowing down the discharge of rainwater and maximising infiltration into the ground.
- 5.46 Runoff from impermeable front half of roofs, roadways, hardstanding footpaths and car parking is proposed to be conveyed into lined raingardens (located within 5m from building extents) and permeable paving and discharged to one of three soakaway infiltration tanks, located 5m away from building extents. Runoff from impermeable rear half of roofs and patios is proposed to be conveyed into unlined raingardens located 5m away from building extents and allowed to drain via localised infiltration to the ground.
- 5.47 Where possible, proposed rainwater pipes from buildings are to pass through adjacent rain gardens to aid treatment, improve water quality and reduce peak flow rates.

5.48 Foul water from the proposed residential development will be conveyed via the internal foul water network and will discharge to the existing DCWW combined sewer on Devonshire Place.



6 Consultation Process

- 6.1 This section summarises the consultation undertaken prior to submitting the planning application, including that with the public and the pre-application discussions with NPTCBC.

Pre-Application Advice

- 6.2 A request for pre-application advice was submitted on the 1st of July 2022 and a pre-application meeting held on the 8th of August. A pre-application response was received on the 11th of August setting out the following:

Table 3 – Pre-application advice and response of the project team

Pre-application advice received (ref. Q2022/0127)	Planning Application - response from project team
Principle of development	
In principle the residential development of this site is in accordance with policies BE1 and SC1.	Noted.
The school modernisation programme undertaken by NPTCBC is likely to meet the requirements of Policy SC2(1) that require that it is demonstrated that the facility is surplus to requirements. To address the requirements of paragraph 3.0.21, consideration in an application should be given to the potential for other alternative community uses, such as public open space and a play area.	Noted, an area of public open space and a play area are incorporated in the scheme.

The high density is considered to be appropriate to its context which is a densely developed urban environment and is reflective of the nature of the units which are being developed at the site.	Noted.
The scale and form of development is considered to be appropriate to its context.	Noted.
Tenure, mix and type of dwellings proposed	
The mix of housing proposed appears to reflect the identified local affordable housing need.	Noted.
The proposal must meet Welsh Government affordable housing quality standards.	Noted.
Visual amenity	
The site within the street scene is prominent and the development would be visible from the adjoining roads. However, the surrounding development screens the site from wider views and any development would have a limited and localised impact.	Noted.
The site as a former school has a strong identity, but the buildings are unoccupied and in deteriorating condition. Due to this, they do detract somewhat from the character and appearance of the area. The three storey element of the scheme can be accommodated without unacceptable harm to visual amenity.	Noted.

Overall, the general design is acceptable and policy compliant. The use of stone on prominent elevations is considered desirable, particularly if stone from the existing buildings can be re-used. It is considered that the brick elevations do need to be broken up by other materials more reflective of the immediate context. The retention where possible of the existing boundary treatments would also be supported and where not possible appropriate boundary treatments that would be reflective of the similar nearby residential development should be incorporated into the scheme.	The houses will use brick and render for the façades with clay and slate tiles. The proposed elevations are articulated by simple framing around openings, full height glazing elements, square bays and crisp clean detailing. Thus, the proposal represents a modern development of the local vernacular, integrating into the context, whilst being innovative and contemporary. The existing stone boundary wall is a key characteristic of the site that defines its identity. Therefore, it will be retained, either in its current location, or where necessary relocated to accommodate additional landscaping and entrance paths. Retaining this element of the site will ensure that its identity is maintained.
Residential amenity and living conditions	
A Construction Environmental Management Plan, at least in draft form, is required to ensure that the impacts on residents are mitigated to an acceptable level. NPTCBC is likely to restrict the hours of operation at the site through the use of a planning condition. Based on the site visit it was considered that generally the layout did achieve a reasonable standard of amenity to neighbouring properties and would not lead to an unacceptable impact on amenity.	As there is no contractor appointed at present, a pre-commencement condition will be necessary to ensure this matter is dealt with.
Biodiversity and ecological impact	
The proposal needs to be supported by appropriate ecological surveys (Extended Phase 1 habitat survey) and where necessary it	The Ecological Assessment Report that accompanies this planning application includes an extended Phase 1 habitat survey as well as

should incorporate appropriate mitigation for any impacts to protected species.	three dusk/ dawn bat surveys, undertaken between August and September 2022.
Full details of ecological enhancement should be included in support of the application.	Appendix 5 of the Report contains a Biodiversity Enhancement Strategy.
Accessibility to the site	
The site is sustainably located.	Noted.
No objection to the proposed access.	Noted.
The Local Highways Authority (LHA) advised that the sustainability appraisal provided has justified a reduction in parking at the site. In terms of highway and pedestrian safety, the LHA raised no objection to the application, but have noted a variety of additional information that should accompany any application.	A Transport Assessment accompanies this planning application which addresses the comments made by the LHA.
Flooding and drainage	
There is no flood risk from any sources to the site.	Noted.
The proposal should be discussed with Dwr Cymru Welsh Water directly to ensure that adequate sewerage capacity is available in the locality and that it can be provided with a water supply.	
De-risking	
No significant risks have been identified at this site based on the information NPTCBC holds. Should any issues be identified at the	Noted.

site, the application should be supported by sufficient information to show that these risks can be effectively mitigated, the detail of which can be secured by conditions.	
Other material considerations	
No heritage assets will be affected by this proposal.	Noted.
As the site is located in an air quality management area, consideration should be given to this issue particularly the potential to increase air pollution in the course of demolition and construction.	An Air Quality Assessment is submitted as part of this planning application.
As noted above a CEMP should be submitted which mitigates these impacts.	As there is no contractor appointed at present, a pre-commencement condition will be necessary to ensure this matter is dealt with.
There appears to be capacity within the current layout to incorporate a play area and this should be included within the finalised application.	An informal play area has been included in the proposed development.
Major Developments	
As this is a major development, there is a statutory requirement for the applicant / developer to consult the community and relevant statutory consultees in advance of formal submission of an application.	A Pre-Application Consultation took place between 28 October and 25 November.
Section 106 Planning Obligations	
NPTCBC is likely to seek planning obligations covering the following: Affordable Housing	Noted.

• Biodiversity • Transport • Education • Public Open Space • Community Facilities	
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Pre-Application Consultation (PAC)

- 6.3 The proposal constitutes ‘Major’ development, as the application involves the provision of over 1,000 square metres of floor area. As required by Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) for all major developments, a Pre-Application Consultation was undertaken between 28th October and 25th November 2022.
- 6.4 The Pre-Application Consultation (PAC) Report that accompanies the application provides full details of the statutory consultation process.
- 6.5 The consultation undertaken was in excess of the legislative requirements. Every effort was made to make the planning application documents and the overall vision for the former school site accessible and clear to the local communities, statutory consultees, and stakeholders.
- 6.6 KEW Planning had notification letters, including the statutory notices, posted first class within a radius of the site of more than 50m. This is in excess of the minimum requirements to ensure a wider audience was captured and best practice methods were adopted.

- 6.7 Hard copies of the application documents were available for viewing at the St Theodore's Church Hall, Talbot Road, SA13 1LB for the duration of the PAC period, and online at <https://kewplanning.co.uk/consultations/> .
- 6.8 In addition to this, a public exhibition was organised on the 8th of November to give members of the public the opportunity to view the scheme, give their views and meet the project design team who were on hand to explain the proposals and answer any questions.
- 6.9 A total of 47 responses were received from the local community and adjoining land owners following the notification of neighbouring land occupiers and the public exhibition. The key concerns raised in the responses were overdevelopment, loss of privacy and overlooking, impact on local road network and existing levels of car parking, impact of proposed affordable housing on the safety of the area, potential increase of antisocial behaviour. These concerns have been addressed in detail in the Pre-Application Consultation Report which accompanies this planning application.

Public Exhibition

- 6.10 The public exhibition was held at the Taibach Community Centre, Duke Street, SA13 1NA on Tuesday 8th November between the hours of 18.00 and 20.00. Linc Cymru representatives Simon Lewis, Alun Jonas, Rachel Stevens, Natalie Hawkins, Shelly Leonard, Bethan Aubrey and Paul Stephans; Kathryn Williams and Ben Smith of KEW Planning; and Aled Roberts and Ellie Perkins of Roberts Limbrick were available to discuss the proposals with the public at this exhibition. Councillor Fairfield attended the exhibition and stayed for the duration of the exhibition.

Social Media

- 6.11 KEW Planning advertised the proposed redevelopment on their social media channels (LinkedIn, Twitter, and Facebook) to ensure that the news of the PAC could reach the widest possible audience.

Conclusions

- 6.12 The above demonstrates that extensive engagement and communication with stakeholders; specialist consultees and the wider community has been undertaken.



7 Justification for the Proposal

7.1 This section of the PS identifies the planning issues associated with the proposed development and explains how each issue has been considered in relation to the adopted development plan and its policies. Further technical details can be found in the supporting reports outlined in paragraph 1.10.

7.2 The relevant planning issues are as follows:

a) Principle of Development

b) Design

1) Proposed Internal Layout

2) Proposed Site Layout

3) External Amenity Space

4) Appearance, Scale and Massing

5) Access and Parking

c) Technical Considerations:

1) Flood Risk, Drainage and SuDS

2) Trees

3) Ecology

4) Landscape

a) Principle of Development

- 7.3 As the site comprises a former school, the proposed development is required to comply with **LDP Policy SC 2 (Protection of Existing Community Facilities)** in order to confirm the principle of development is acceptable. The policy states that proposals which would result in the loss of an important existing community facility will only be permitted where it can be demonstrated that the facility is surplus to requirements, or the existing use is no longer viable. The former Dyffryn Lower Comprehensive School, which provided education for Years 7 and 8, closed in 2018 as it was replaced alongside Groes Primary School by Ysgol Cwm Bromptil which accommodates 1,455 pupils aged 3 to 16 on the Dyffryn Upper School site. NPTCBC's Education Skills and Culture Cabinet Board published their cabinet paper, dated April 2019, recommending that Members declare the former Dyffryn (Lower) school land and premises at Talcennau Road as being surplus to the operational requirements of the Education, Leisure and Lifelong Learning Service and transfer responsibility to the Head of Property & Regeneration.
- 7.4 The paper highlights the Council's responsibility to promote high educational standards and deliver efficient primary and secondary education, which is achieved through having the right schools in the right place to ensure they are fit for the 21st century learner. In order to achieve this, Cabinet determined to implement a proposal for a brand new 21st Century school to replace Gores Primary and Dyffryn School, which would both be discontinued.
- 7.5 Addressing the requirements of supporting paragraph 3.0.21, the nature and condition of the existing buildings on site are such that it would not be possible to adapt them to a new community use. Instead, the proposal includes a generous area of public open space which will be enjoyed by future residents of the scheme and the local community. Therefore, it is considered that the proposal meets the requirements of **LDP Policy SC 2**.

- 7.6 Consequently, the principle of residential development within this brownfield, vacant and underutilised site is acceptable, in line with **LDP Policy SC 1 (Settlement Limits)** which confirms that development within settlement limits that is proportionate in scale and form to the role and function of the settlement limit, as set out in the Settlement Hierarchy, will be acceptable in principle. The site is located within the settlement limit, as identified in Figure 11, meaning the principle of residential development is acceptable. The ways in which the proposal is proportionate in scale and form to the surrounding area are outlined in more detail below. Additionally, the proposed development would contribute towards NPTCBC's commitment to provide 8,760 homes over the plan period (2011-2026), as required by **LDP Policy SP7 (Housing Requirements)**, and 1,200 affordable homes as required by **LDP Policy AH1 (Housing)**.
- 7.7 In addition to this, **LDP Policy SP 5 (Development in the Coastal Corridor Strategy Area)** promotes sustainable growth and development which benefits the County Borough as a whole, while protecting and enhancing the area's character and environment. This is achieved through making provision for the majority of new residential development along the coastal corridor, where the proposed development site is located. This, alongside the above, demonstrates that the principle of development is therefore acceptable.
- 7.8 The proposal will be 100% affordable, with tenure details to be confirmed at a later stage. The pre-application advice notes that the **Affordable Housing SPG** supports the provision of properties being provided by registered social landlords as tenure neutral (section 4.4), as this would allow the greatest flexibility in addressing the housing need of the area. TAN2 states the view of the Welsh Government that the involvement of a registered social landlord secures sufficient control over future occupancy of affordable housing. It is therefore likely that officers will be flexible in terms of tenure reflecting the adopted policy position within the SPG and TAN2.

b) Design

1. Proposed Internal Layout

- 7.9 The proposed dwellings are comprised of 2-bed houses, 3-bed houses (of two typologies), 1-bed flats and 2-bed walk up flats (of two typologies). The internal layout of these dwellings can be seen in submitted drawings, which demonstrate that all dwellings are provided with a suitable layout with good sized bedrooms and living areas which will provide a high quality of life for future residents.
- 7.10 The proposed units have all been designed in accordance with the Welsh Development Quality Requirements (WDQR) 2021 (Creating Beautiful Homes and Places), which sets out the minimum functional quality standards for new affordable homes. The 1-bed flats all measure 51.8sqm, which exceeds the requirements of 50 sqm in accordance with the WDQR. The ground floor 2B3P flats measure 59.9 sqm and 61 sqm (cranked), which exceed the WDQR requirement of 58 sqm for common access flats. The first floor 2B3P walk-up flats exceed the WDQR requirement of 65sqm through measuring 69.2 sqm and 69.8 sqm (cranked). The proposed 2B4P houses measure 84.4 sqm, exceeding the requirement of 83 sqm; the proposed Type 1 3B5P houses measure 94 sqm, exceeding the requirement of 93 sqm; and the proposed Type 2 3B5P houses measure 96 sqm, exceeding the requirement of 93 sqm. The size and layout of the proposed development has therefore been designed in accordance with the requirements of the WDQR (2021), demonstrating that the proposal recognises the benefit that quality and culturally suitable homes will have on both physical and mental well-being for future residents.
- 7.11 The above demonstrates that the proposed dwellings all exceed the desired internal floor space measurements, ensuring the proposals provide a high standard of living for future residents. As such, the proposals meet the requirements of **LDP Policy SP 21 (Built Environment and Historic Heritage)**, which required high quality design standards in all proposals, and **LDP Policy BE 1 (Design)** which requires proposals to achieve inclusive design, as confirmed in the pre-application advice.

- 7.12 The proposed development will have a density of 57 dwellings per hectare, which is in excess of the minimum requirement. The pre-application advice notes that this is appropriate in the local context, a densely developed urban environment, and that it is reflective of the nature of the proposed units.

2. Proposed Site Layout

- 7.13 The proposed development includes the provision of 43 new homes, comprising 2,938 sqm of residential accommodation. The site layout responds to the constraints and opportunities of the site through fronting the proposed dwellings along the perimeter of the site onto the existing roads, replicating the terraced streetscape of the area, and fronting the proposed dwellings within the site onto the new internal road in order to provide a sense of arrival for residents entering the site. The proposed buildings are situated as such to create focal points and aid street legibility.
- 7.14 The new vehicular access is proposed from York Place, allowing for minimal disruption to existing traffic, and leads to the retained building along the site's south-eastern boundary to provide a vista and homage to the site's history. Pedestrian access is available from all boundaries, ensuring the development significantly improves the site's permeability and connection to the surrounding area.
- 7.15 The development retains the existing mature trees within the site's southern corner, adjacent to the area of Public Open Space (POS), meaning the root protection area of the trees are not adversely impacted by the proposed development. This also means that the dwellings fronting this area of POS are provided with a pleasant outlook and passive surveillance. In addition to this area, the new layout will provide new pedestrian routes for the local community, to and through the residential area, punctuated with pockets of landscaped spaces, providing additional trees and low-level planting. The landscaped design will contextualise the buildings and offer a connective fabric. The landscape framework defines public and private areas, with green defensible space to the front of properties, soften boundaries and creating a pleasant public realm.

- 7.16 The above demonstrates that paragraphs 3.3 to 3.13 of **PPW 11** have been considered and incorporated into the development, ensuring the scheme places people and the environment at the heart of the design. With regards to local planning policy, the above demonstrates that **LDP Policies BE 1 (Design), SP 21 (Built Environment and Historic Heritage), and TR 2 (Design and Access of New Development)** have all been complied with.

3. External Amenity Space

- 7.17 All proposed dwellings are provided with their own private external amenity space, in the form of gardens or balconies (as stipulated in paragraph 5.13 of this report), in accordance with the WDQR 2021 standards, which require all family homes to have a private garden, which is safe for small children to play, convenient to use, of sufficient size and is easy to maintain. In addition, the proposal incorporates an area of dedicated POS, which is a significant improvement to the existing site which has large areas of hardstanding.
- 7.18 The proposed development would therefore contribute public open space to an area that is currently severely lacking in open space available to nearby residents. This demonstrates that paragraphs 4.1.19 to 4.1.35, and 6.2.5 of **PPW 11** have been incorporated into the development to create active and social streets, through integrating green infrastructure into the development. With regards to local planning policy, it is considered that **LDP Policy SP10 (Open Space)** has been complied with.

4. Appearance, Scale and Massing

- 7.19 The proposed development will create high quality, healthy, sustainable and a locally distinct place. As highlighted within the accompanying DAS, the proposed development has been developed through an understanding of the heritage and context of the site, to develop high quality, comfortable and modern homes.

- 7.20 The existing building along the site's boundary with Devonshire Place will be retained, along with the existing stone boundary wall where possible. This ensures the development links to the site's history and heritage, immediately creating a strong sense of place and identity within the scheme. The pre-application advice confirms that the retention, where possible, of the existing boundary treatments would also be supported.
- 7.21 The existing stone boundary wall will be retained, either in its current location, or where necessary relocated to accommodate additional landscaping and entrance paths. Whilst retaining the existing buildings is not feasible, the viability of reusing some of the stone will be examined thoroughly. This will embed the new dwellings in their setting.
- 7.22 In addition to any reclaimed stone, the 2- and 3-storey developments will be constructed using brick and render for the facades, with clay and slate tiles for the roof. This corresponds with the materiality of the surrounding context, demonstrating that the development includes high quality design whilst also safeguarding features of historic and cultural importance. The proposed massing is appropriate in this context due to the site's urban location surrounded by rows of two-storey terraced housing. The three-storey apartment blocks are set back into the site, ensuring the scale of the area is not altered whilst also ensuring the neighbouring properties are not overshadowed.
- 7.23 The pre-application advice comments that due to the surrounding development, the site is screened from wider views and any development would have a localised impact. The existing buildings, unoccupied and in deteriorating condition, are considered to detract somewhat from the character and appearance of the area.
- 7.24 The high-density proposal ensures the development contributes towards the Council's housing requirement – as set out in **LDP Policy SP7 (Housing Requirement)** – whilst also incorporating large areas of landscaping to create a strong sense of place. As the design

is progressed, the most appropriate energy efficiency measures for the site will be reviewed and included in the development proposal. It is therefore considered that the proposed development is in line with **LDP Policies SP21 (Built Environment and Historic Heritage) and BE 1 (Design)**, as well as the requirements of **PPW 11** and **TAN 12 (Design)**.

5. Access and Parking

- 7.25 A new priority junction creates access from York Place, with a new internal road through the site that terminates at the retained building. The proposed development significantly improves the site's permeability and connection with the surrounding area through incorporating pedestrian accesses on all four boundaries. These pedestrian accesses lead to walking and cycling routes through the site which align with likely desire lines and provide clear visibility and legibility for future residents or members of the public walking through the site.
- 7.26 The proposal's car and cycle parking provision are outlined in Section 5 of this report. Although the car parking provision is below the maximum standards set out in the **Parking Guidance SPG**, which would equate to 79 resident parking spaces and 9 visitor parking spaces, the site sits within a highly sustainable and connected location. The SPG allows for reductions based on the sustainable location of the site and potential car ownership levels. To adequately consider a reduction in parking, Appendix F of the SPG includes a sustainability calculation which is fully analysed within the submitted Transport Statement.
- 7.27 To summarise the findings of the Transport Statement, given the site's extremely accessible location within 800m of a wide range of local facilities, public transport links with good frequency, and a cycle route, it is considered the reduction in car parking is acceptable. The Transport Statement also highlights that there is a low level of car ownership in the immediate surrounding area, with ownership levels at 0.91 cars per household and 40% households without a car. As such, the proposed development incorporates 0.95 spaces per household (excluding visitor parking), which is considered appropriate in line with the SPG, as well as

Policy 12 of Future Wales: The National Plan 2040, which states that planning authorities should promote car-free and low car developments in accessible location such as this.

- 7.28 The access and parking arrangements are therefore fully in accordance with **LDP Policy TR 2 (Design and Access of New Development)**, **Parking Guidance SPG**, **Future Wales Policy 12**, and **PPW (edition 11)**.

c) Technical Considerations

1) Flood Risk, Drainage and SuDS

- 7.29 The development site lies within Flood Zone A, as identified within the NRW DAM, and sits outside the Flood Zone for Rivers and Seas within the NRW FMfP (refer to Figures 9 and 10). This means it is at low risk of flooding and a Flood Consequence Assessment will not be required. However, as identified within the FMfP (Figure 10), very small areas along the western and southern boundaries are within Flood Zone 2 (Surface Water).
- 7.30 As such, a Drainage Strategy has been submitted that incorporates high quality surface water and foul water drainage systems. Landscaped areas have been included in the site layout to enhance the site's biodiversity, and these will be lower than the adjacent paved areas to integrate with the SuDS features.
- 7.31 The proposal has therefore considered the requirements of **TAN 15**, as well as **LDP Policy SP1 (Climate Change)**. NRW and Welsh Water will be consulted in due course to confirm that the proposal is acceptable in flood risk and drainage terms. A Pre-SAB application has already been submitted to NPTCBC, to be followed by a full SAB Application.

2) Trees

- 7.32 It is proposed to remove three trees to facilitate the construction of the proposed development. Two of these are small low or poor quality trees and their loss is not detrimental to the arboricultural value of the site. The removal of a moderate quality tree (B Category) to the norther boundary will be mitigated for by suitable compensatory tree planting on the site, as shown in the landscape plan: its loss is therefore considered acceptable. The existing mature trees located along the site's southern and eastern boundaries will be retained.
- 7.33 The Arboricultural Report demonstrates that the proposal will have no adverse impact on the retained trees, as well as outline any mitigation measures to be incorporated into the proposed development.

3) Ecology

- 7.34 As the application site has low ecological value overall, the proposal offers the opportunity to provide biodiversity gains. Appendix 5 of the Ecological Assessment Report contains a Biodiversity Enhancement Strategy showing the proposed location for bird and bat boxes, log piles, native scrub planting and wildflower meadows.
- 7.35 Replacement roosts for common pipistrelle bats will be required as compensation for the loss of the roost resource when the school buildings are demolished. The recommended level of mitigation for the loss of the known and potential roosts is the provision of 15 replacement roosts for crevice dwelling bats. This will provide a variety of roost conditions and provide sufficient shelter for the number of pipistrelle bats recorded at the Site. The proposed mitigation strategy is to provide eight raised ridge tiles to provide access for bats under the roof cover and seven bat boxes that can be integrated into the walls of the new buildings. The provision of new crevice roost features on different aspects of the buildings will create varying thermal environments within the artificial roosts and the bat boxes will benefit from the thermal qualities of the building mass.

- 7.36 The Report also recommends that five nest boxes for house sparrows are erected on the new building to encourage breeding at the site by this species. The proposed habitat enhancement scheme also includes five general purpose bird boxes that can be erected on trees or installed on houses with gardens.
- 7.37 The mitigation measures required during construction will be detailed within a Construction Environmental Management Plan (CEMP). As there is no contractor appointed at present, a pre-commencement condition will be necessary to ensure this matter is dealt with.
- 7.38 The management of habitats created, retained and enhanced as part of the development will be described within the submitted Biodiversity and Landscape Management Plan.
- 7.39 The above demonstrates that the proposed development is in accordance with the requirements of **LDP Policy EN7 (Important Natural Features)**, which requires development to take full account of natural features in the design of the development, and if removal is unavoidable, mitigation measures will be agreed.

4) Landscape

- 7.40 A Landscape Design Statement accompanies this planning application, to demonstrate that the proposal will significantly improve the site's existing character and appearance, benefitting future residents and residents of the wider neighbourhood alike.
- 7.41 The new layout will offer the local community new pedestrian routes, to and through the residential area, in addition to new open space, punctuated with pockets of landscaped spaces, additional trees and low-level planting. The landscape design will contextualise the buildings and offer a connective fabric by providing break-up areas of parking and hardscape, providing a more

natural feel to the proposed development. The spatial framework will define public and private areas, providing defensible space to the front of properties, create a soft boundary by infilling space between houses, and create a pleasant public realm.

- 7.42 In response to the pre-application advice, the area of public open space now includes an informal, soft natural play area to be enjoyed by future residents as well as the local community.
- 7.43 The planting scheme will include native species to minimise maintenance requirements and offer an enjoyable outdoor environment for future residents. Pollinator's species will be supported by wildflower meadow areas (with reduced to a maximum of two cuts a year) to enhance the habitat value, with localised pockets of rich species turf for amenity areas.
- 7.44 The proposal has been designed to enhance biodiversity by creating pocket spaces with new native species (trees, shrubs and ground cover), offer amenity areas, and places to sit along footpaths that connect to wider the neighbourhood. Sheltered and secure cycle parking will be incorporated with easy access to support active travel to and from site. The landscape design will use a simple palette of robust materials which could be sourced locally and will require low maintenance during occupation.
- 7.45 The above demonstrates that the proposed development will result in a significant improvement to the site's existing character and appearance, which comprises mostly of hardstanding. It can therefore be demonstrated that the development is in accordance with **LDP Policy EN7 (Important Natural Features)** and **NPTCBC's Biodiversity and Geodiversity SPG** (May 2018) through ensuring biodiversity value is taken into account.



8 Conclusions and Benefits

- 8.1 All development should be sustainable in order to meet the national and local planning policy objectives. Sustainable development must meet three key deliverables, which are environmental, economic and social factors. The proposed development meets all of the key criteria as demonstrated below.

Environmental

- 8.2 As the site currently comprises hard standing and vacant buildings, it is considered that the proposed development will significantly improve the site's existing environmental and ecological value. This is achieved through incorporating high quality landscaping, enhancing the existing ecological and biodiversity features on site, and retaining the mature trees along the site's southern boundary. It is also anticipated that the proposed development's sustainable approach of reducing car provision and incorporating high quality pedestrian routes through the site will improve the site's connectivity to its surrounding context. These features will encourage future residents and surrounding residents to use sustainable modes of transport. Finally, the proposal will use sustainable materials that are locally sourced, wherever possible.

Social

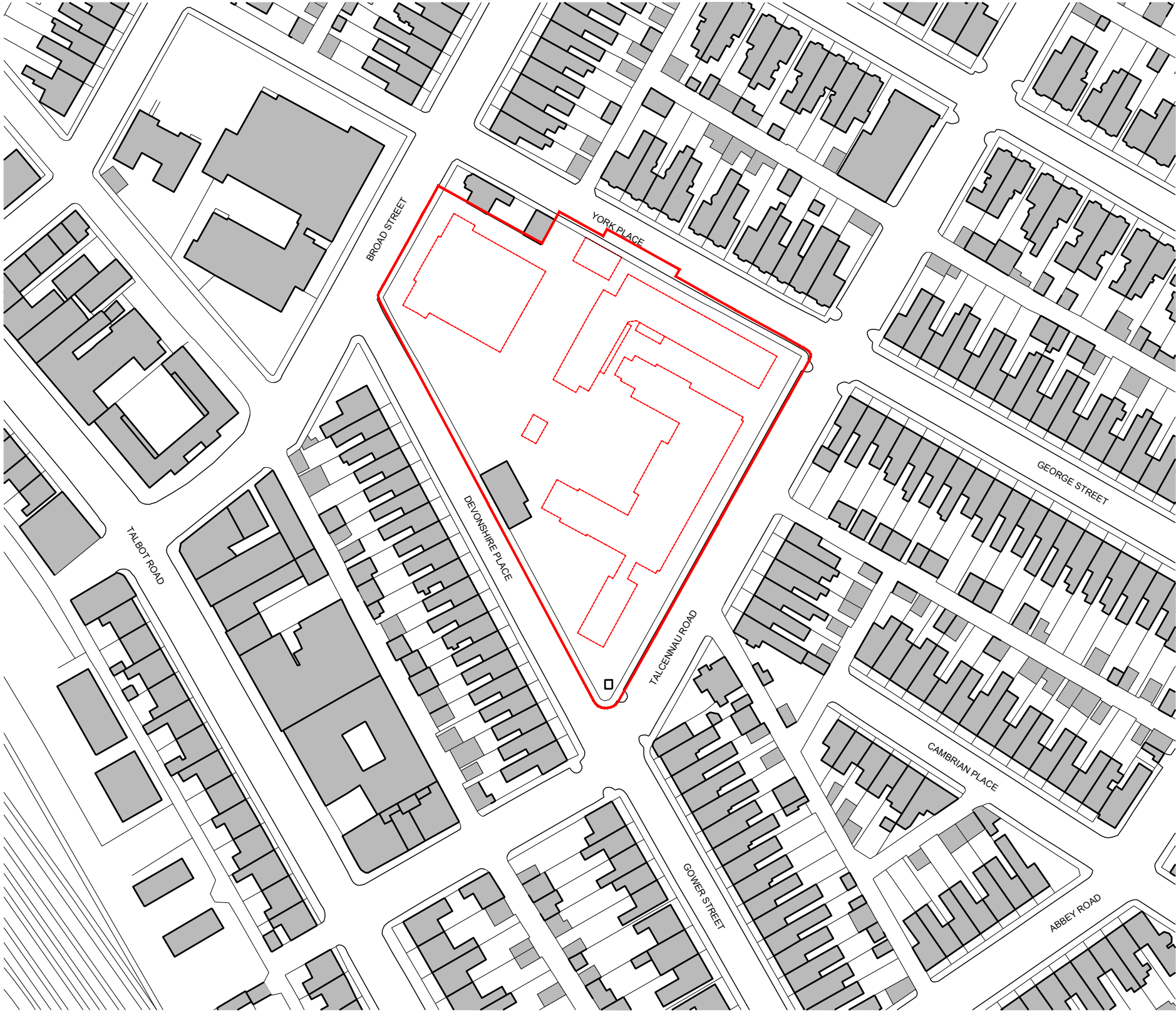
- 8.3 The proposed development will provide 43 new affordable homes in a brownfield, underutilised site situated in an extremely sustainable and accessible location. This, alongside the scheme's sense of place and high-quality landscaping, will create a new community and fantastic quality of life for future residents. Linc Cymru's philosophy is to build homes and environments that improve people's quality of life and create great places for people to live and flourish.

- 8.4 This is a vast improvement to the site's current derelict state which does not provide passive surveillance to the surrounding streets, leading to an un-safe and uninviting environment. The 43 homes will also contribute towards NPTCBC's target of delivering 1,200 affordable homes over the Plan period (2011-2026), helping those who are unable to access or afford open market housing.

Economic

- 8.5 Delivering 43 new affordable homes will lead to significant economic benefits such as the creation of jobs during construction, as well as additional spending in the local economy due to the introduction of new residents. These factors will contribute towards the vitality of Talbot Road, as well as Port Talbot town centre.

Appendix 1 – Site Location Plan



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rev.	date	description
A	12/12/22	Boundary line amended



Roberts Limbrick

project
Residential Development
Devonshire Place
Port Talbot

client
Linc Cymru

drawing
Site Location Plan

status
PLANNING

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MAY 2022

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project
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rev.
A

Appendix 2 – Pre-Application Advice



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad	11th August 2022
Direct line Rhif ffôn	01639 686776
Email Ebost	m.griffiths5@npt.gov.uk
Contact Cyswllt	Matthew Griffiths
Your ref Eich cyf	
Our ref Ein cyf	Q2022/0127

Kathryn Williams
Suite 4
11 Cathedral Road
Cardiff
CF11 9HA

BY EMAIL ONLY

Dear Sir/Madam

Town and Country Planning Act 1990

Pre-App. Ref.: Q2022/0127
PROPOSAL: Development for 43no. affordable dwellings and associated works including a new access, an internal road network, landscaping, sustainable drainage, car and cycle parking.
LOCATION: Former Dyffryn Lower School Talcennau Road Port Talbot Neath Port Talbot SA13 1EP

I refer to your correspondence received on 1 July 2022, concerning the above and your request for pre-application advice. Our pre-application service is detailed on our website and we offer comment on the following issues:

- (i) Relevant planning history;
- (ii) Relevant development plan policies against which the proposal will be assessed;
- (iii) Any relevant supplementary planning guidance;
- (iv) Any other material planning considerations;
- (v) Whether any Section 106 contributions are likely to be sought and an indication of the scope and amount of contributions;
- (vi) The information required to enable validation of any subsequent application;
- (vii) Informal, and without prejudice, comments on the planning merits of your proposals including, where appropriate advice on design, and preparation and presentation of an application likely to satisfy the Council's planning policies.

Amgylchedd ac Adfywio

Ceri Morris Pennaeth Cynllunio a Gwarchod y Cyhoedd

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

Ffôn 01639 686868

Environment and Regeneration

Ceri Morris Head of Planning and Public Protection

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

Tel 01639 686868

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

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

Having considered the nature of the submission and following our meeting with you and your client; I respond as follows.

Local Context and Constraints

- Air Quality Management Area
- Coal Authority development low risk area

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

Relevant Planning History

From an examination of our records, no material planning history has been identified.

Relevant Planning Policies

The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet its sustainable development (or wellbeing) objectives. This report has been prepared in consideration of the Council's duty and the "sustainable development principle", as set out in the 2015 Act. In reaching the recommendation set out below, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

National Planning Policy:

[Future Wales: The National Plan 2040](#) is the national development framework, setting the direction for development in Wales to 2040. The development plan sets out 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 wellbeing of our communities.

The following policies are of particular relevance to the assessment of this application:

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

Policy 7 – Delivering Affordable Homes

Policy 9 – Resilient Ecological Networks and Green Infrastructure

Policy 12 – Regional Connectivity

[Planning Policy Wales \(Edition 11, February 2021\)](#) outlines the Welsh Government's commitment to the importance of 'places' and 'place-making', the importance of using previously developed land wherever possible in preference to greenfield sites, and the recognition of the health and wellbeing related benefits by creating a sense of place and improving social cohesion. PPW 11 confirms that the environmental components of places are intrinsically linked to the quality of the built and natural environment and contribute to the health and wellbeing of the people who live, work and play there. It emphasises the importance of creating sustainable communities and reducing reliance on the private car as part of a package of measures to reduce the country's carbon footprint and help tackle the climate emergency.

PPW11 sets out that the first stage in considering a proposal is against the Strategic and Spatial Choices issues and the national sustainable placemaking outcomes. This is a key gateway test which ensures these important issues are explored with opportunities identified along with potential mitigation measures. Next, the detailed impact and contribution to Active & Social Places, Productive and Enterprising Places and Distinctive & Natural Places is assessed. The considerations within each of these themes will vary on a case-by-case basis depending on the proposal concerned. However the merits, or otherwise, of a proposal need to be considered in the public interest. This process will result in a strategy or proposal which contributes to the sustaining of or creation of sustainable places and which delivers on the national sustainable placemaking outcomes.

The following is of particular relevance in the assessment of this planning application:

4.2.25 A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications. Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers.

PPW 11 is supported by a series of more detailed [Technical Advice Notes](#) (TANs), of which the following are of particular relevance: -

- [TAN 2: planning and affordable housing \(30 June 2006\)](#)
- [TAN 5: nature conservation and planning \(30 September 2009\)](#)
- [TAN 11: noise \(31 October 1997\)](#)
- [TAN 12: design \(31 March 2016\)](#)
- [TAN 15: development and flood risk \(20 July 2004\)](#)
- [TAN 16: sport, recreation and open space \(31 January 2009\)](#)
- [TAN 18: transport \(31 March 2007\)](#)
- [TAN 24: the historic environment \(30 May 2017\)](#)

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

Strategic Policies

- | | |
|----------------------|---|
| • Policy SP1 | Climate Change |
| • Policy SP2 | Health |
| • Policy SP3 | Sustainable Communities |
| • Policy SP7 | Housing Requirement |
| • Policy SP8 | Affordable Housing |
| • Policy SP10 | Open Space |
| • Policy SP14 | The Countryside and the Undeveloped Coast |
| • Policy SP15 | Biodiversity and Geodiversity |
| • Policy SP16 | Environmental Protection |
| • Policy SP19 | Waste Management |

- **Policy SP20** Transport Network
- **Policy SP21** Built Environment and Historic Heritage

Topic based Policies

- **Policy SC1** Settlement limits
- **Policy H1** Housing Sites
- **Policy AH1** Affordable Housing
- **Policy I1** Infrastructure Requirements
- **Policy OS1** Open Space Provision
- **Policy EN6** Important Biodiversity and Geodiversity Sites
- **Policy EN7** Important Natural Features
- **Policy TR2** Design and Access of New Development
- **Policy WL1** Development in Language Sensitive Areas
- **Policy BE1** Design
- **Policy W3** Waste Management in New Development

Supplementary Planning Guidance:

The following SPG is of relevance to this application:

- Planning Obligations (October 2016)
- Parking Standards_(October 2016)
- Affordable Housing_(October 2016)
- Biodiversity and Geodiversity (May 2018)
- Pollution (October 2016)
- Open Space & Greenspace (July 2017)
- Design (July 2017)

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

Analysis of Proposal

Introduction and Key Issues

This proposal is for the demolition of the former Dyffryn Lower School and its re-development for 43 affordable dwellings and associated works including a new access, an internal road network, landscaping, sustainable drainage, bin storage, car and cycle parking.

Based on the nature of the proposal and the policy context outlined above, the following are considered to be the key issues:

- Principle of development
- Density, tenure and mix of dwellings proposed
- Visual amenity
- Residential amenity and living conditions
- Biodiversity and ecological impact
- Accessibility to the site
- Flooding and drainage

The Development Plan comprises Future Wales - the National Plan 2040 and the Neath Port Talbot Local Development Plan (2011–2026) adopted January 2016. Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires that decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

Principle of development

The site of development is located within the Settlement Limit of Port Talbot as defined by Policy SC1 of the LDP and associated Proposals Map. Development within settlement limits that is proportionate in scale and form to the role and function of the settlement is generally acceptable in principle.

The site of development was not allocated for any use within the LDP and as noted above was previously occupied by a school. A school would be considered as a community use to which Policy SC2 would apply. This policy seeks to protect existing community facilities, allows for the loss of a community facility where it is demonstrated that the facility is surplus to requirements or that the existing use is no longer viable. The reasoned justification for policy SC2 goes on to say the following at paragraph 3.0.21: "...any change to a non-community use will be resisted unless it can be demonstrated that the facility is no longer viable or needed by the community and that there is no potential that the building can be used for an alternative or shared community use."

The supporting information to the enquiry indicates that the school was declared to be surplus to the Authority's requirements, with Ysgol Cwm Brombil providing alternative provision at a nearby site. The school modernisation programme undertaken by the Authority is likely to meet the requirements of Policy SC2(1) that require that it is demonstrated that the facility is surplus to requirements. To address the requirements of paragraph 3.0.21 consideration in an application should be given to the potential for other alternative community uses. Re-use for alternative uses is not addressed in the current pre-application enquiry. We did discuss during our meeting the nature and condition of the buildings and the potential for there to be continued community use within the scheme in the form of public open space and a play area. The public open space and play area could be included in the application to address this issue and the supporting information to the application should consider the potential for re-use of the building.

The site is located within a settlement as defined by Policy SC1 and its associated proposal maps. It is also a vacant previously developed site. The surroundings are residential and the site is sustainably located with public transport and services in close proximity. The LDP envisages the provision of over 2,000 dwellings in Port Talbot (LDP table 5.3) and it is defined as a Town in the settlement hierarchy. In this context the development of 43 dwellings, is considered to be of an appropriate scale and form to the function of the settlement in compliance with SC1. The plan contains an allowance for the provision of 825 dwellings on large windfall sites and the provision of housing from these sites would fall within delivery of this type of site as envisaged in the plan.

Policy BE1 Design requires that all development proposals must be of high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. Criterion 8 requires developments to make the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area. The site is around 0.75 of a hectare and it is proposed to accommodate 43 homes. This would give a density of 57 dwellings per hectare, which is well in excess of the minimum requirement. In principle this density is considered to be appropriate to its

context which is a densely developed urban environment and is reflective of the nature of the units which are being developed at the site.

In principle the residential development of this site is in accordance with policies BE1 and SC1.

Tenure, mix and type of dwellings proposed

Planning Policy Wales 11 states in paragraph 4.2.1 that: “new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities.” At paragraph 4.2.29 it goes on to state that: “Applicants for planning permission should therefore demonstrate and justify how they have arrived at a particular mix of housing, having regard to development plan policies.” this paragraph goes on to state: “All affordable housing, including that provided through planning obligations and planning conditions, must meet the Welsh Government’s development quality standards.”

The proposal is for the erection of a 43 dwellings. In terms of tenure the enquiry indicates that the proposal will be developed by a registered social landlord as affordable housing, but does not provide detail of the proposed tenure. The affordable housing SPG supports the provision of properties being provided by registered social landlords as tenure neutral (section 4.4), this would allow the greatest flexibility in addressing the housing need of the area. Technical Advice Note 2 Affordable Housing, states the view of the Welsh Government that the involvement of a registered social landlord secures sufficient control over future occupancy of affordable housing. It is likely that the Authority will be flexible in terms of tenure reflecting the adopted policy position within the SPG and TAN2.

The mix of homes proposed is as follows:

- 1 bed apartment – 18 units
- 2 bed apartment – 6 units
- 2 bed house – 8 units
- 3 bed house – 11 units

In accordance with PPW11, the supporting information to a future application should include a justification for the mix of housing with regard to development plan policy.

The application has been referred to the strategic housing team within the Authority. At present they have not responded to the consultation. They would have a role in commenting on the mix of housing provision in an affordable housing scheme such as this. Notwithstanding their lack of response to the enquiry, it is noted that there is generally across the Authority a need for affordable dwellings. This includes an identified need for 3,100 affordable dwellings over the plan period, this need is across a range of housing types. Sources such as the Mid and South West Wales Housing Assessment summary for Neath Port Talbot identify a particular need for 1 and 2 bedroom properties with a smaller need for 3 bedroom properties within the settlement of Port Talbot. In general it is considered that the mix of housing will be appropriate in meeting affordable housing need, based on the evidence available to the Authority.

To accord with PPW11 the proposal must meet Welsh Government affordable housing quality standards.

Overall the mix of housing proposed does appear to reflect the identified local affordable housing need. If advice is provided by the strategic housing team this will be forwarded on, but the

application should also be accompanied by a statement justifying the type of housing proposed (this can be incorporated into a supporting planning statement).

Visual amenity

Policy BE1 requires that development complements and enhances the character and appearance of the site; respects the context of the site and its place within the local landscape; utilises materials appropriate to its surroundings; and incorporates appropriate landscaping.

The site is within a densely developed urban area and has a road frontage to all sides. Along Devonshire Place and Talcennau Road the dwellings are terraced. York Place has a mixture of semi-detached and terraced properties. To Broad Street the site fronts to the Central Junior School. Roads are relatively wide with on street parking.

The site within the street scene is prominent and the development would be visible from the adjoining roads. There is a slight change in levels across the site, but it is relatively flat. The surrounding development screens the site from wider views and any development would have a limited and localised impact. The site as a former school has a strong identity with railings and stone walls to the frontage and also characteristic educational buildings of various scales including some larger buildings which would be similar in height to a three storey property. The buildings are unoccupied and in deteriorating condition, due to this they do detract somewhat from the character and appearance of the area.

The proposal is to develop the site with forty three dwellings. The impact on visual amenity was discussed during a site visit and also within the pre-application meeting. Generally the scheme appears to be largely acceptable. Considering the various road frontages, the development to York Place is similar to the existing surrounding development. The opportunities to develop to Broad Street are limited and the development follows a similar form to the surrounding area with the development of three properties. Along Devonshire Place existing site features such as mature trees and one of the school buildings are retained and development is of a much less dense character. To Talcennau Road the properties are larger with the three storey apartments facing the highway at this point. Based on a site visit it is considered that the three storey element of the scheme can be accommodated without unacceptable harm to visual amenity. In general the scale and form of development is considered to be appropriate to its context.

The facing materials are brickwork and stone under slate roofs. There is limited amounts of brickwork in the locality with most of the surrounding properties having stone elevations. There is brickwork in the wider locality. The use of stone on prominent elevations is considered desirable, particularly if stone from the existing buildings can be re-used. It is considered that the brick elevations do need to be broken up by other materials more reflective of the immediate context.

The retention where possible of the existing boundary treatments would also be supported and where not possible appropriate boundary treatments that would be reflective of the similar nearby residential development should be incorporated into the scheme.

Overall the general design is acceptable and in accordance with Policy BE1.

Residential amenity and living conditions

Policy BE1(4) requires that development does not have a significant adverse effect on the amenity of local residents. The Authority has Supplementary Planning Guidance (adopted July 2017) on Design which provides specific advice on how to consider residential amenity impacts in determining planning applications.

The site is directly adjoined by one residential property 22 Broad Street and there are numerous other residential properties in close proximity, separated by the surrounding roads. The proposal will involve extensive demolition of the majority of the existing buildings at the site and the extensive hard standing areas. The demolition and construction impacts should be fully considered in any application and it is likely that a Construction Environmental Management Plan will be required to ensure that the impacts on residents are mitigated to an acceptable level. This should be submitted with the application at least in a draft form. The Authority is also likely to restrict the hours of operation at the site through the use of a planning condition.

Full consideration should be given to the amenity of adjoining residential properties in the finalised design. Based on the site visit it was considered that generally the layout did achieve a reasonable standard of amenity to neighbouring properties and would not lead to an unacceptable impact on amenity.

Biodiversity and ecological impact

Policies EN6 and EN7 require any impacts on biodiversity/ natural features to be appropriately assessed and, where applicable, mitigated. The site is occupied by buildings hard standing and mature trees. During the site visit it was outlined that ecological surveys were being undertaken due to the potential for the site to be occupied by protected species. These have not been finalised and have therefore not been provided in support of the enquiry. The Authority cannot therefore provide detailed advice on the surveys undertaken or the appropriateness of any proposed mitigation.

The proposal needs to be supported by appropriate ecological surveys and where necessary it should incorporate appropriate mitigation for any impacts to protected species. The Authority is also required, under Section 6 of the Environment (Wales) Act 2016 to secure ecological enhancement as part of its decisions on planning applications. Full details of ecological enhancement should be included in support of the application.

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

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

An assessment of ecosystem resilience (Section 2 Environment (Wales) Act 2016); this shall particularly consider:

- (a) diversity between and within ecosystems;
- (b) the connections between and within ecosystems;
- (c) the scale of ecosystems;
- (d) the condition of ecosystems (including their structure and functioning);
- (e) the adaptability of ecosystems.

You will also need to put forward proposals for mitigation/compensation for any adverse impacts identified in the above assessments. For larger applications advice from a suitably qualified ecologist should be sought. Enhancements will also be required as part of the SuDs process but must be detailed in the planning application.

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

Due to there being limited information on the ecological impact of the development the Authority cannot provide substantive advice on this issue. However, providing that appropriate surveys are undertaken and suitable mitigation and enhancement provided, then the proposal can potentially comply with Policies EN6 and EN7.

Accessibility to the site

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

PPW states that “It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles”. This is reflected in the Parking Standards SPG (October 2016), which gives guidance on the level of parking required.

There are bus stops a short walk from the site. The supporting information also indicates that there is cycle parking available to residents. The site is close to the services of Port Talbot town centre, opposite a primary school and also close to the railway station. It is considered that the site is sustainably located and the proposal is considered to be in reasonable compliance with the sustainable transport hierarchy as set in Planning Policy Wales. The Local Highways Authority (LHA) has responded to the application and advised that the sustainability appraisal provided has justified a reduction in parking at the site. In terms of highway and pedestrian safety, the LHA raised no objection to the application, but have noted a variety of additional information that should accompany any application. The development creates a new access directly onto the public highway. No objections to this have been raised to this.

Overall, and subject to addressing the comments of the LHA, the proposal is viewed to be in accordance with policy TR2.

Flooding and drainage

The application was referred to the Authority’s Highways and Drainage service.

In their response they have indicated that the development will require separate approval under the sustainable drainage regulations. The Sustainable Drainage Approval Body (SAB) has not indicated in their response to the Local Planning Authority that the scheme is not capable of meeting the statutory standards (Surface water runoff destination; Surface water runoff hydraulic control; Water Quality; Amenity; Biodiversity; Design of drainage for construction, operation and maintenance). In light of this response it is considered that the appropriate disposal of surface water can be left through the SAB approval process.

The site is not in an area of fluvial flood risk as identified in Technical Advice Note 15: Development and Flood Risk. Constraints did not identify flood risk from other sources to the site.

The application form indicates that foul flows will be diverted to the main sewer. The proposal should therefore be discussed with Dwr Cymru Welsh Water directly to ensure that adequate sewerage capacity is available in the locality and that it can be provided with a water supply.

De-risking

Planning Policy Wales (2020) sets out that the planning system should guide development to reduce the risk from natural or human made hazards affecting the land surface or subsurface. Risks to development may arise from matters such as land stability due to former mine workings or land contamination. Strategic Policy SP16 sets the context for consideration of environmental protection and requires protection and where feasible improvement of the environment. Policy EN8 sets out that development that would expose people to unacceptable risk due to contamination or land instability will not be permitted.

The site is identified as being in The Coal Authority (TCA) development low risk area. Within these areas there remains some risk of undocumented works and the standing advice of the TCA will apply.

The site is not identified as being likely to be potentially contaminated. During the site visit it was noted that ground investigations were being undertaken. If these investigations identify any potential issues at the site then the proposal should be discussed with the Authority's contaminated land officer and Natural Resources Wales.

No significant risks have been identified at this site based on the information the Authority holds. However, as noted above this is previously developed site and there maybe issues identified in the investigations being undertaken at the site. If any issues are identified at the site the application should be supported by sufficient information to show that these risks can be effectively mitigated, the detail of which can be secured by conditions.

Therefore, the proposal is determined to be in accordance with Policies SP16 and EN8 of the Local Development Plan.

Other material considerations

The site is isolated from heritage assets such as listed buildings, conservation areas or scheduled ancient monuments. There are some buildings of local importance, along Talbot Road, but these are separated from the site by existing development along Devonshire Place and would be unaffected by the proposal.

The site is located in an air quality management area and consideration should be given to this issue particularly the potential to increase air pollution in the course of demolition and construction. As noted above a CEMP should be submitted which mitigates these impacts.

As discussed during our site meeting and meeting with the applicants, the Authority would be supportive of the incorporation of an on-site play area. The nearest play area appears to be located at Talbot Memorial Park which is over 350 metres away to the south east and separated by roads and existing development. There appears to be capacity within the current layout to incorporate a play area and this should be included within the finalised application.

Major Developments

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

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

Best practice guidance for developers on Pre-application Community Consultation can be found on the [Welsh Government website](#).

Section 106 Planning Obligations

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

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

- Affordable Housing
- Biodiversity
- Transport
- Education
- Public Open Space
- Community Facilities

In relation to affordable housing, we note that the proposal is for an affordable housing scheme to be provided by a registered social landlord. Mechanisms for ensuring that the development is affordable will need to be detailed in any application. No requirement for biodiversity to be incorporated into the section 106 have been identified, however this position will be further informed by surveys at the site and the proposed mitigation and enhancement.

The calculations submitted in support of the enquiry have been reviewed. We note that it is suggested that the floor area of the development is 2,925 sqm, however there appears to be an additional unit within the scheme than referred to in the calculations and the planning statement indicates a floor area of 2,938 sqm. Calculations have been based on the higher floor area, 43 units (of which 25 are 2 bedroom).

In respect to transport a figure of £84.85 per square metre is identified to contribute to improvements to the cycle / pedestrian network. This would equate to a contribution of £249,289.30. In relation to education, the calculation should be based on 25 units of 2 or more bedroom properties and would therefore equate to £223,325. The requirement for a contribution will depend on the capacity within the schools in the locality at the time the application is made, with this figure being the maximum payable. I have requested the current capacity within schools in the locality and will forward on receipt of this detail.

In relation to community facilities the Council does not consider it appropriate to apply a standard formula for calculating the likely scale of the planning obligation. The impact of new development proposals will be assessed against the existing level of provision in discussion with the developer and stakeholders including Local Councillors.

In relation to open space we would assess the following contributions:

Outdoor Sports Pitch - £12,212

Outdoor Sports - Non-Pitch - £44,290

Informal Spaces - £2,709

Children's Play - £36,765

Allotment - £2,064

Total – £98,040

Viability

Where a developer/applicant indicates that they may be unable to provide the full affordable housing requirement or other planning obligations on viability grounds, they will need to submit a detailed financial assessment of the proposed development using the Council's Development Viability Model (DVM). For more information, please visit our [Viability Assessments for Planning Applications](https://www.npt.gov.uk/media/16366/section-106-obligations-viability-assessment-procedure-note-and-guidance-note.pdf) page and/or read the Council's Viability Assessment Procedure Note: <https://www.npt.gov.uk/media/16366/section-106-obligations-viability-assessment-procedure-note-and-guidance-note.pdf>.

Before submitting an application, and as part of any further pre-application discussions (which may require further charges), the Planning Officer will discuss the Council's expectations, and offer you the opportunity for a completed viability assessment to be submitted and reviewed prior to the planning application (subject to payment of the relevant charges outlined on the Council's website at <https://www.npt.gov.uk/30472>). Alternatively this can be at application stage, though we would always recommend initiating discussions at pre-application stage.

Required Supporting Documentation

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

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

- Pre-Application Consultation (PAC) Report ('Major' development)
- Design and Access Statement (see TAN 12 Design, Appendix 1)
- Phase 1 Habitat Survey / Bat Survey / Barn Owl Survey
- Details of biodiversity enhancements
- Tree Survey
- Site survey identifying existing ground levels, plus details of proposed levels including sections / cross-sections
- Transport statement

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

It is also this Authority's practice to recommend to applicants that detailed information is submitted at application stage to ensure that, in the event of planning permission being granted, that 'pre-commencement' conditions (which require approval of details prior to work starting on

site) can be minimised. You are therefore encouraged to ensure that your initial submissions incorporate as much information as possible (for example materials, boundary treatment, ecology mitigation, Construction Management Plan, Travel Plan etc.), and address all matters raised in the advice given above.

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

“Guidance on the use of the standard application form ('1app') and validation of applications”:
<https://gov.wales/sites/default/files/publications/2019-03/section-7-annex-planning-applications-lists-of-validation-requirements.pdf>

The Town and Country Planning (Development Management Procedure)(Wales) Order 2012: [http://www.legislation.gov.uk/wsi/2012/801/contents/made \(original Order\)](http://www.legislation.gov.uk/wsi/2012/801/contents/made (original Order)).
(Note subsequent Amendment Orders: [2014](#) ; [2015](#) ; [2016](#) ; and [2017](#)).

How we will deal with your planning application

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

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

While Officers will endeavour to ensure you are aware of the progress of your application, we would encourage you to contact the case officer should you wish to discuss any matter further.

Development Team Approach – Building Control

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

Requests for Further Advice

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

Yours faithfully

A handwritten signature in black ink, appearing to read 'M Griffiths', with a long horizontal flourish extending from the end.

Matthew Griffiths

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

Seeking Pre-Application Advice from External Consultees

Natural Resources Wales (NRW)

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

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

Dŵr Cymru Welsh Water (DCWW)

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

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

Coal Authority

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

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

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