

**HARVEY CRESCENT, ABERAVON,
NEATH PORT TALBOT, SA12 6DF**

**PROPOSED RESIDENTIAL DEVELOPMENT
AND ASSOCIATED WORKS**

PLANNING STATEMENT

MARCH 2023



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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of a Full planning application, submitted on behalf of Coastal Housing Group for the following development proposal:

'Proposed residential development and associated works.'

Documents Submitted in Support of the Application

- 1.2 The following documents have been prepared in support of the Full Planning Application.

Document/Plan	Reference/Location
Planning Application Form	GJP
Planning Statement	GJP
Site Location Plan	HMA
Site Layout Plan	HMA
House Type Plans	HMA
Flood Consequences Assessment	JBA
Ecology Survey	Ecology Planning
Tree Report & AIA	ArbTS
Engineering Drawings	PHG
Transport Statement	Corun Associates
Knotweed Survey	Taylor Total Weed Control
Site Investigation Report	Intégral Géotechnique

Purpose and Structure of this Statement

- 1.3 This Planning Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development. The statement is structured as follows:
- **Section 2** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site;
 - **Section 3** provides details of the development proposals;
 - **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
 - **Section 5** analyses the key planning considerations arising from the proposed development (in light of the planning policy context); and,
 - **Section 6** sets out our conclusions.

2.0 SITE AND SURROUNDINGS

Site

- 2.1 The site is located within the Sandfields locality, which is of a central location in Port Talbot, to the North-East of the river Afan. The approximate red line boundary of the site is provided below.



Approximate Red Line Boundary of Site

- 2.2 The site currently comprises vacant, brownfield land, having previously been used as the location of the offices for Dewi Saint housing association. There are several hedges and trees to the North-East of the site. The surrounding properties consist of residential flats and semi-detached houses.

Access

- 2.3 The site is currently accessed off Harvey Crescent, to the South of the site, to allow safe and efficient movement of traffic. Access for the site has been previously implemented in connection with its previous use.
- 2.4 This access to the site has previously been considered acceptable to cater for a housing association and therefore, it is considered that the proposed development will unlikely lead to

any material change to traffic flows to the site. The site has very good visibility splays in both directions to ensure that vehicles can enter and leave the site in a safe and efficient manner.

Surroundings

- 2.5 The site lies within a predominantly residential area, with supporting uses located within the area of Sandfield East, Port Talbot.
- 2.6 There are residential properties surrounding the site, which are accessed via Harvey Crescent to the south; Newbridge Road to the west; and Victoria Road to the north. To the north-east of the site there is an existing Pet store and Port Talbot Welfare Club.

Sustainability and Connectivity

- 2.7 The site is located within a sustainable location – in close proximity to a number of local facilities and services.
- 2.8 In terms of public transport provision, the nearest bus stop is located circa 170m walking distance to the north-west of the site entrance - situated on Newbridge Road. The bus stop is served by the '82', and '9' Services which travel from Sandfields to Port Talbot Bus Station. Both the '82' and '9' run services hourly. Also located along Victoria Road, approximately 300m (walking distance) from the site, are 2 Hospital Road bus stops. These are served by numerous bus lines ('9', '82', '84', '87' and '66'), which provide additional services to Aberavon, Margam, Port Talbot and Swansea, on a more frequent basis each hour.
- 2.9 The site is located circa 250m south of Victoria Road. This road has several facilities including a 'Payzone' cash point, a 'Well' Pharmacy, a Nisa Local General store, various restaurants, as well as other services. The Port Talbot Gas Welfare Club is situated approximately 40m to the north-west of the site. To the west of the site, The Port Talbot Town Football Club is also located within 200m, and Tywyn Primary School, which is also circa 550m to the west. There is also a large recreation ground, Vivian Park, approximately 550m to the north of the site.
- 2.10 It is therefore considered that the site is located within a sustainable location and is well provided for in terms of services and facilities including public transport.

Planning History Context

Application Reference	Site Location	Proposal	Decision Date	Decision
The Site				
P/2011/560	Dewi Saint House, Harvey Crescent, Sandfields Port Talbot	Prior Notification for the demolition of Dewi Sant House.	26/07/2011	Prior notification not required.

On site (P/2011/560)

- 2.11 The Applicant, Coastal Housing Group, previously put forward an application for determination as to whether Prior Notification was required for the demolition of the former Housing Association offices, Dewi Sant House in 2011.
- 2.12 The council ruled that prior notification was not required. An extract from the application on the councils planning application search has been included below, showing the previous building that existed before demolition.



Extract of location plan for application P2011/0560

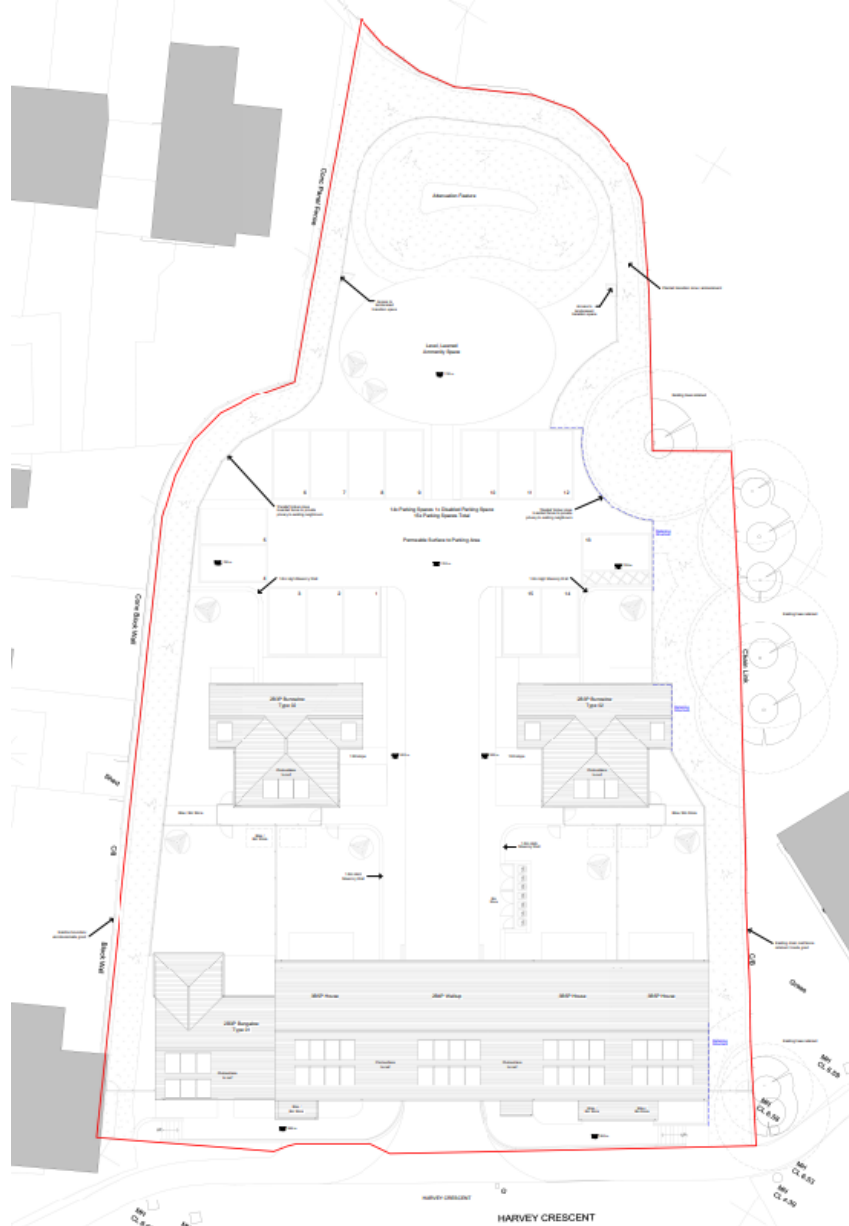
Surrounding Area

- 2.13 No other relevant planning history or applications for other residential developments in the surrounding area were found on the council's planning application search.

3.0 DEVELOPMENT PROPOSALS

The Proposals

- 3.1 The proposed development comprises 7no. affordable dwellings (100%) and associated works. The proposal will also provide access, amenity space, and parking.
- 3.2 The proposed residential dwellings mix comprises the following:
- 2no. 2-bed Mews House;
 - 1no. 2-bed Bungalow;
 - 3no. 3-bed house; and
 - 1no. 2-bed Walk-up apartment.
- 3.3 The below extract is taken from the Proposed Ground Floor Plan:

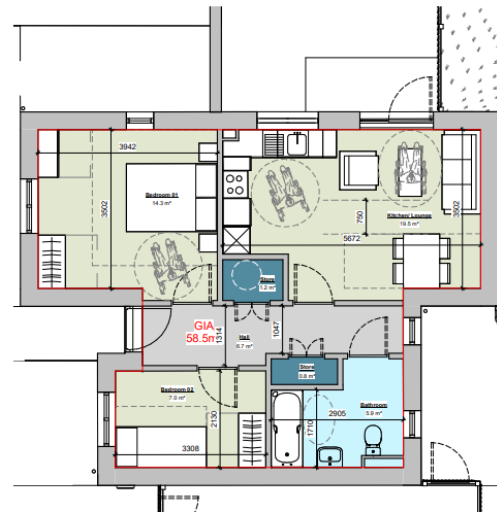


Extract of Site Layout Plan

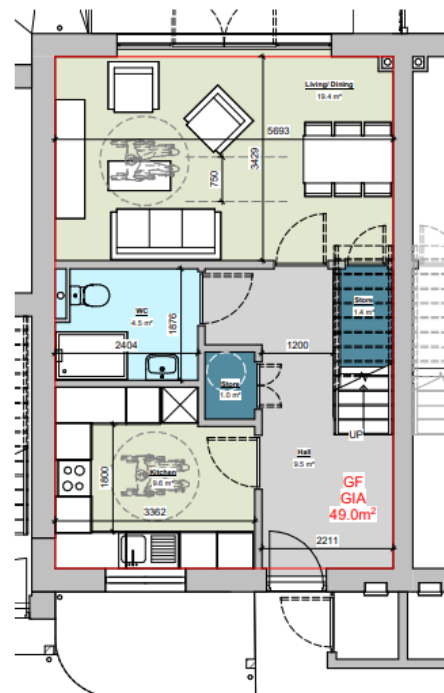
3.4 Floorplans of the proposed units are provided below:



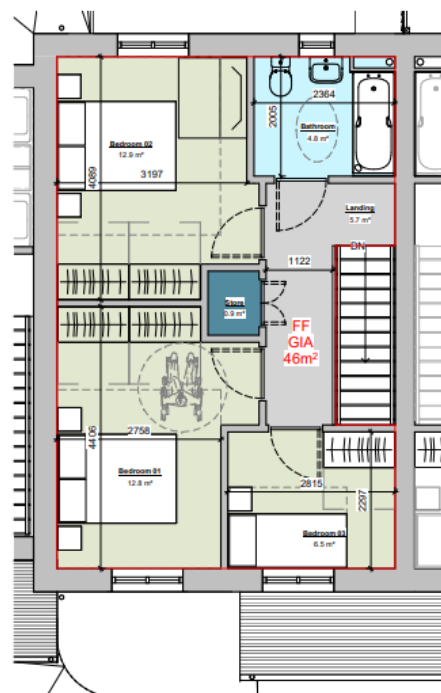
Bungalow Type 01 Floor Plan

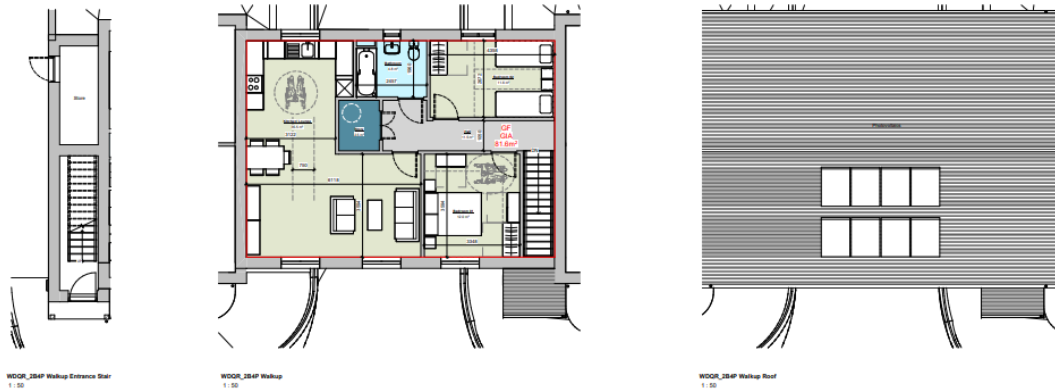


Bungalow Type 02 Floor Plan



House Floor Plans





Walkup Floorplans

3.5 The following are elements which are part of the proposed plans and drawings:

- There is a mix of housing provided, including a mix of 2-bed and 3-bed properties, in single and two-storey form;
- Appropriate and adequate access provision from Harvey Crescent;
- Relevant soakaway drainage and SuDS; and
- Each property benefits from parking provision and a generous amenity provision.

3.6 A mix of two storey and single storey dwellings are proposed to respond to the specific site constraints and context. The inclusion of varied two-house types adds interest to the street scene. The variations between the unit types are demonstrated in the elevations which are included as part of this submission, with some examples extracted below:



Front Elevation (from Harvey Crescent)



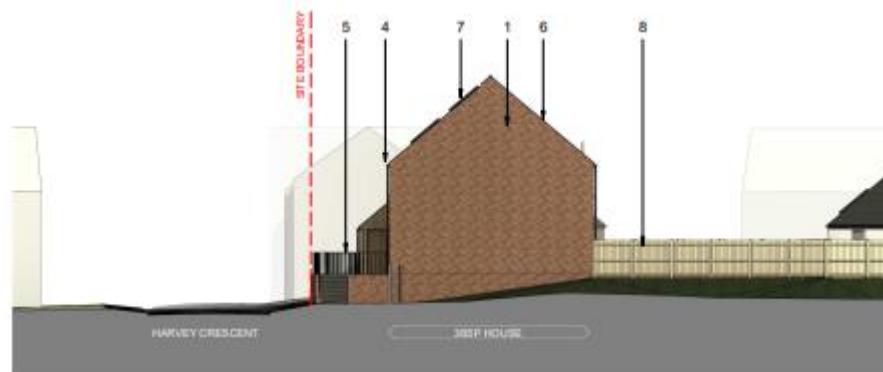
Rear Elevation (Mews House)



Rear Elevation (Bungalows)



Side elevation 01



Side elevation 02



Side elevation 03

- 3.7 Vehicular access will be provided from Harvey Crescent, to the south of the site, which comprises a slight relocation to the existing access. This access will be designed in accordance with local guidance, and will include dropped kerbs to ensure pedestrian movement along the existing Harvey Crescent footway is accommodated.
- 3.8 An internal access road will lead north from the access junction, into a central courtyard within the site. Internal pedestrian footways will be provided through the site, connecting to the access points off all proposed units on the site. These footways will run along both edges

of the internal access road carriageway, and along a raised and fenced route across the site frontage.

- 3.9 As seen in the plans, a caretaker store and bin store will be provided within the site, and the development itself will be managed by the Registered Social Landlord (RSL) – Coastal Housing Group.
- 3.10 Amenity space will be provided within the northern area of the site for residents, and provision for disabled parking will also be included as part of the proposals.
- 3.11 Appropriate landscaping and incorporation of SuDS also forms an important part of the site, and has informed the site layout, by way of ensuring such features can be implemented and accommodated sufficiently.
- 3.12 In total, 15no. car parking spaces are provided, with the provision of 1no. disabled parking space. This car parking area is located towards the rear of the development site. Footpaths within the site will allow residents to safely access their properties from the car parking area.

4.0 PLANNING POLICY CONTEXT

- 4.1 A review of the planning policy context associated with the site and proposed development (at the national and local level) is provided within this section of the Statement.
- 4.2 The key planning policies of relevance to the determination of the application are outlined. A detailed assessment of the accordance of the proposed development with these policies is provided in Section 5 (Material Considerations) of this Statement.

National Planning Policy

- 4.3 The following policy / guidance documents prepared at the national (Welsh Government) level are of relevance to the determination of the application.

Planning Policy Wales: Edition 11 (February 2021)

Key Planning Principles

- 4.4 Paragraph 2.13 states that *"The plan-led system underpins the delivery of sustainable places to ensure all development plans and decisions taken by the planning system work together to deliver sustainable places. The Key Principles (see Figure 4) represent a guiding vision for all development plans, including Future Wales"*. The key principles are as follows:

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

- 4.5 Paragraph 2.17 states *"In responding to the key principles for the planning system, the creation of sustainable places and in recognition of the need to contribute to the well-being of future generations in Wales through placemaking, development plans and development proposals must seek to deliver development that address the national sustainable placemaking outcomes"*.

Sustainability and Placemaking

- 4.6 Sustainable development forms a key consideration central to all policies contained within Planning Policy Wales (PPW). Paragraph 2.1 states: "The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation".
- 4.7 Paragraphs 2.8-2.9 set out the key drivers for placemaking, and states:

"Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working [long-term thinking, prevention, collaboration, integration and involvement], as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, whilst considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle. The most appropriate way to implement these

requirements is to adopt a placemaking approach to plan making, planning policy and decision making."

4.8 Paragraph 1.14 sets out The Well-being of Future Generation's Goals.



People and Places – National Sustainable Placemaking Outcomes

4.9 Paragraph 2.17 states:

"In responding to the key principles for the planning system, the creation of Sustainable Places and in recognition of the need to contribute to the wellbeing of future generations in Wales, planning policies and development proposals must seek to deliver development that address the National Sustainable Placemaking Outcomes."

National sustainable placemaking outcomes

4.10 Figure 6 on page 20 outlines how PPW should be used to achieve sustainable places in a diagrammatic manner.



4.11 Paragraph 2.27 sets out how to assess the sustainable benefits of development:

Planning authorities should ensure that economic, social, cultural and environmental benefits are given equal consideration in the decision-making process, by following the five Ways of Working, to ensure a balanced assessment is carried out and to implement the Well-being of Future Generations Act and the Sustainable Development Principle. There may be occasions when one type of benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contribution against the well-being goals. In assessing these benefits, key factors include:

Social Considerations

- *who are the interested and affected people and communities;*
- *how does the proposal change a persons way of life, which can include:*
 - *how people live, for example, how they get around and access services;*
 - *how people work, for example, access to adequate employment;*
 - *how people socialise, for example, access to recreation activities; and*
 - *how people interact with one another on a daily basis.*
- *who will benefit and suffer any impacts of the proposal;*
- *what are the short and long-term consequences of the proposal on a community, including its composition, cohesion, character, how it functions and its sense of place; and*
- *how does the proposal support development of more cohesive communities.*

Economic Considerations

- *the numbers and types of long term jobs expected to be created or retained;*
- *whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing local employment opportunities or upgrading the environment;*
- *the contribution the development would make to achieving wider strategies, for example the growth or regeneration of certain areas;*
- *the contribution this economic activity will have to wider policy goals, for example in the green growth sector; and*
- *how the proposal would support achievement of a more prosperous, low carbon, innovative and resource efficient Wales.*

Cultural Considerations

- *how far the proposal supports the conditions that allow for the development and growth of the Welsh Language;*
- *whether or not the development protects areas and assets of cultural and historic significance;*
- *have cultural considerations and their relationships with the tourism industry been appropriately maximised*
- *if the proposal protects areas known for their cultural value in terms of music, literature, sport and the arts; and*
- *vibrant cultural experiences.*

Environmental Considerations

- *will important features of the natural, historic and built environment be protected and enhanced;*
- *are the environmental impacts of development on health and amenity limited to acceptable levels and the resilience of ecosystems improved;*

- *is environmental protection for people, natural and cultural resources, property and infrastructure maximised and environmental risks prevented or appropriately managed;*
- *will high standards of restoration, remediation, decommissioning and beneficial after uses be achieved;*
- *will the depletion of non-renewable resources be minimised, waste prevented and the efficient and most appropriate use of materials made and re-use and recycling promoted;*
- *will the causes and impacts of climate change be fully taken into account through location, design, build, operation, decommissioning and restoration; and*
- *does it support decarbonisation and our transition to a low carbon economy"*

Good Design

- 4.12 It is set out within Paragraph 3.3 of PPW that *"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use as well as its construction, operation, management, and its relationship with the surrounding area".*
- 4.13 Further detail regarding the objectives of good design is set out within Technical Advice Note (TAN 12: Design (2016) – as detailed further below.
- 4.14 Figure 8 in PPW sets out the objectives of good design in an illustrative / diagrammatic manner.



Promoting Healthier Places

- 4.15 Paragraph 3.21 states:

"Planning authorities have a role to play in the prevention of physical and mental illnesses caused, or exacerbated, by pollution, disconnection of people from social activities (which contributes to loneliness) as well as the promotion of travel patterns which facilitate active lifestyles. The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity. This will include considering the provision of, and access to, community and health assets, such as

community halls, libraries, doctor's surgeries and hospitals. Health impacts should be minimised in all instances, and particularly where new development could have an adverse impact on health, amenity and well-being. In such circumstances, where health or amenity impacts cannot be overcome satisfactorily, development should be refused."

4.16 Paragraph 3.22 states:

"Planning authorities should develop and maintain places that support healthy, active lifestyles across all age and socio-economic groups, recognising that investment in walking and cycling infrastructure can be an effective preventative measure which reduces financial pressures on public services in the longer term. The way a development is laid out and arranged can influence people's behaviours and decisions and can provide effective mitigation against air and noise pollution. Effective planning can provide calming, tranquil surroundings as well as stimulating and sensory environments, both of these make an important contribution to successful places."

Housing

4.17 Paragraph 4.2.2 states, in respect of housing that "the planning system must:

- *Identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- *Enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and*
- *Focus on the delivery of the identified housing requirement and the related land supply."*

4.18 Moreover, Paragraph 4.2.10 states: *"The supply of land to meet the requirement proposed in a development plan must be deliverable. To achieve this, development plans must include a supply of land which delivers the identified housing requirement figure and makes a locally appropriate additional flexibility allowance for sites not coming forward during the plan period. The ability to deliver requirements be demonstrated through a trajectory. The trajectory will illustrate the expected rate of housing delivery for both market and affordable housing for the plan period"*

4.19 Paragraph 4.2.13 also states: *"As part of considering housing delivery options, planning authorities should understand the contribution that all sectors of the housing market and house-builders could make to meeting their housing requirement. When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of house-builder ... the opportunity to deliver the proposed housing requirement."*

4.20 Paragraph 4.2.23 states: *"Development plans must include clear policy criteria against which applications for housing development on unallocated sites will be considered. Infill and windfall sites can also often make a useful contribution to the delivery of housing. Proposals for housing on infill and windfall site development within settlements should be supported where they accord with the national place-making outcomes."*

Affordable Housing

4.21 In respect of affordable housing, Paragraph 4.2.25 states: *"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."*

- 4.22 Paragraph 4.2.29 states: *"Where development plan policies make clear that an element of affordable housing, or other developer contributions, are required on specific sites, this will be a material consideration in determining relevant applications. 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. If, having had regard to all material considerations, the planning authority considers that the proposal does not contribute sufficiently towards the objective of creating mixed communities, then the authority will need to negotiate a revision of the mix of housing or may refuse the application."*

Active and Social Streets

- 4.23 Paragraph 4.1.22 states:

"The Welsh Government policy, Manual for Streets and its companion guide Manual for Streets 221, requires that street design should not follow the conventional engineering-led approach. The design of new or enhanced streets should respond to urban design principles, including those in Manual for Streets and the Active Travel Design Guidance²², and not adhere to rigid standards. Design Bulletin 32: Residential Roads and Footpaths has been superseded by Manual for Streets."

Public Transport

- 4.24 Paragraph 4.1.37 states:

"Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are highly accessible by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure, and services, reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development."

Sustainable Buildings

- 4.25 Paragraph 5.8.1 states:

"The planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of climate change, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures."

- 4.26 Paragraph 5.8.2 states:

"The Welsh Government's policy is to secure zero carbon buildings while continuing to promote a range of low and zero carbon technologies as a means to achieve this."

- 4.27 Paragraph 5.8.3 states:

"Sustainable building design principles should be integral to the design of new development. Development proposals should:

- mitigate the causes of climate change by minimising carbon and other greenhouse gas emissions associated with their design, construction, use and eventual demolition; and*
- include features that provide effective adaptation to, and resilience against, the current and predicted future effects of climate change."*

Technical Advice Notes (TANs)

4.28 The relevant Technical Advice Notes of relevance to the determination of this application are;

- TAN 2 – Planning and Affordable Housing (2006);
- TAN 12 – Design (2016);
- TAN 15 – Development and Flood Risk (2021); and
- TAN 18 – Transport (2007).

TAN 2 – Planning and Affordable Housing (2006)

4.29 TAN 2 provides practical guidance on the role of the planning system in delivering affordable housing. The guidance defines affordable housing for ease of reference to key stakeholders. The TAN provides advice to local planning authorities on how to determine affordability, and outlines the importance of collaborative planning with site owners and key stakeholders alike.

TAN 12 – Design (2016)

4.30 Detailed guidance on the objectives of good design is set out within TAN 12. The objectives of good design are set out within the following categories:

Access

- Ensuring ease of access for all

Movement

- Promoting sustainable means of travel

Sustaining or Enhancing Local Character

- Promoting legible development
- Promoting a successful relationship between public and private space
- Promoting quality, choice, and variety
- Promoting innovative design

Community Safety

- Ensuring attractive, safe public spaces
- Security through natural surveillance

Environmental Sustainability

- Achieving efficient use and protection of natural resources
- Enhancing biodiversity
- Designing for change

4.31 TAN 12 advises that in areas of special character such as conservation areas the way in which new development is accommodated and change is managed may need a greater level of direction from the local planning authority. It is stated that *"whilst meeting the objectives of good design should be the starting point, more detailed advice may be required to ensure preservation or enhancement of specific qualities, and these should form part of the pre-application discussions."* Moreover, *"in conservation areas there should be regard to the desirability of preserving or enhancing their character and appearance."*

4.32 It is also stated in Paragraph 5.6.2 that *"within conservation areas, the objective of sustaining character is particularly important and context appraisals should reflect this"* and *"the general aspects of the "character" objective of good design should be pursued."*

TAN 15 – Development and Flood risk

- 4.33 Tan 15 provides advice and technical guidance in relation to development and flooding. It is stated in paragraph 4.3 that *"The overarching aim when considering new development is to prevent exposure to risk, by making locational choices in the following order of preference:*

- Direct new development to areas at minimal risk of flooding – areas in Zone 1;*
- Enable resilient development in areas served by formal flood risk management defences that reduce the risk and consequences of flooding over the lifetime of development – areas in the TAN 15 Defended Zones;*
- Allow resilient development in undefended areas of relatively low risk – areas in Zone 2."*

- 4.34 The advice in section 10 relates specifically to flood risk caused by rivers and the sea, and paragraph 10.1 states that *"Development in Zone 1 is acceptable in principle in relation to flood risk, providing it does not cause any increase in flood risk elsewhere. Where development is proposed in a flood risk area facing risk from rivers and the sea, the planning authority will need to be satisfied that its location is justified. It is important that areas in Zone 3 are used only as a last resort, and not at all for new highly vulnerable development. More flexibility is permitted in Zone 2 and the TAN 15 Defended Zones, where formal defence infrastructure provides a good standard of protection against flooding."*

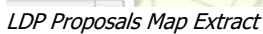
TAN 18 – Transport (2007)

- 4.35 As paragraph 3.3 of TAN 18 sets out, *"The location of new residential development has a significant influence on travel patterns as the majority of trips start or finish at home."* For this reason, the criteria set out within TAN 18 are of particular relevance to this proposal.
- 4.36 The overarching theme of TAN 18, with reference to new residential development is set out in paragraph 3.3 which states *"It should be a key aim of development plans to identify residential sites that are accessible to jobs, shops and services by modes other than the car and where public transport services have the existing or planned capacity to absorb further development."*
- 4.37 TAN 18 also sets out parking space requirements for new residential development, as well as the criteria for any new highways built on the proposed site.

Local Policy Context

Neath Port Talbot County Borough Council Local Development Plan (2011-2026)

- 4.38 Neath Port Talbot Council adopted their replacement LDP in January 2016. This is the statutory plan for the Authority until 2026.
- 4.39 An extract from the LDP Proposals Map is provided overleaf. As previously discussed, the government building named on the LDP map has since been demolished.



Key	Designation	Key	Designation
	SC1 – Settlement Limit		SP5 – Coastal Corridor Strategy Area
	Policy M2/1 – Settlement Protection Zone		

4.40 As shown on the LDP proposals map, the site is:

- Located within the Settlement Limit for Port Talbot – Policy SC1.
- Situated within the Coastal Corridor Strategy Area – Policy SP5.
- Situated in the Settlement Protection Zone – Policy M2/1.

4.41 Neath Port Talbot Council does not have a separate constraints map; however, constraints are included together with the proposals map. Therefore, based on the extract above it is considered that the site is not subject to any major constraints.

4.42 In view of the above, it is considered that the policy position regarding the site is of most relevance to the proposed development. The relevant policies are:

Policy	Title	Summary
SP 3	Sustainable Communities	This policy provides a Settlement Hierarchy, which identifies areas which are in sustainable location and can more appropriately accommodate growth in terms of their function. Sandfields is identified within this, as a large local centre.
SC 1	Settlement Limits	Development within the settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.
SP 5	Coastal Corridor Strategy Area	Development in the Coastal Corridor Strategy Area will be promoted to benefit the County Borough as a whole, whilst also protecting and enhancing the areas character and environment. Within this, they highlight the importance of making provision for the majority of new residential development along the coastal corridor.

Policy	Title	Summary
SP 8	Affordable Housing Strategy	Meeting affordable housing need is a fundamental element of the strategy, as a key function of the LDP is catering for Neath Port Talbot's housing requirement.
AH 1	Affordable Housing	All new housing developments, including conversions, on sites accommodating 3 or more units will be required to contribute to affordable housing provision. The exact affordable housing contribution to be provided will depend on the circumstances of each proposal and the viability of the scheme.
M2 / 1	Surface Coal Operations	This policy identifies areas where surface coal operations would be unacceptable in principle and draws out settlement protection zones, which are drawn at a distance of 500m around all settlements in Neath Port Talbot.
SP 20	Transport and Access	The strategy seeks to provide a sustainable and more integrated transport network. The LDP aims to develop the transport network to safely and effectively facilitate the movement of people and freight within the County Borough, to reduce reliance on the private car and to improve connectivity to neighbouring areas.
TR 2	Design and Access of New Development	New Development must demonstrate that it will have no adverse effect on the existing highway network and should also be accessible by a variety of means, not just the private car.
SP 21	Built Environment and Historic Heritage	The strategic policy therefore seeks to conserve and enhance the built environment and heritage of the whole County Borough. This hopes to do so by encouraging high quality design standards in all development proposals.
BE 1	Design	All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.

Supplementary Planning Guidance

- 4.43 The key Supplementary Planning Guidance (SPG) which are of relevance to the proposals are summarised below:

Title	Summary
Planning Obligations (2016)	This guidance has been prepared in order to set out how the Council will use obligations to ensure that, where necessary, the impact of development is mitigated by appropriate improvements to local infrastructure, facilities or services.
Design (2017)	This guidance has been prepared in order to set out the framework of design considerations in relation to new residential development in Neath Port Talbot.
Affordable housing (2017)	This provides guidance on implementing affordable housing policies and proposals contained within the LDP, addresses the affordable housing need in Neath Port Talbot and negotiating affordable housing contributions.

5.0 MATERIAL CONSIDERATIONS

5.1 The key planning considerations arising from the proposed development (in light of the planning policy context outlined within the preceding section of the Statement) are considered to be as follows:

- Principle of Development;
- Design;
- Sustainability;
- Landscaping;
- Residential Amenity;
- Highways and Access;
- Flood Risk & Drainage;
- Trees; and
- Other Issues.

5.2 These issues are discussed in further detail below.

Principle of Development

5.3 As previously discussed, the site is located within the settlement limit for Port Talbot, which is categorised as a Sustainable Community (SP3) within the LDP and placed at the top of the Settlement Hierarchy. The Settlement Hierarchy identifies Port Talbot as one of the most sustainable locations to accommodate more growth within the administrative boundaries. Therefore, the location of the site is considered to be acceptable in principle for the proposed residential use / development.

5.4 The development will provide 100% affordable homes, with the following mix : 3no. 2-bed bungalows, 3no. 3-bed houses and 1no. 2-bed walk-up apartment.

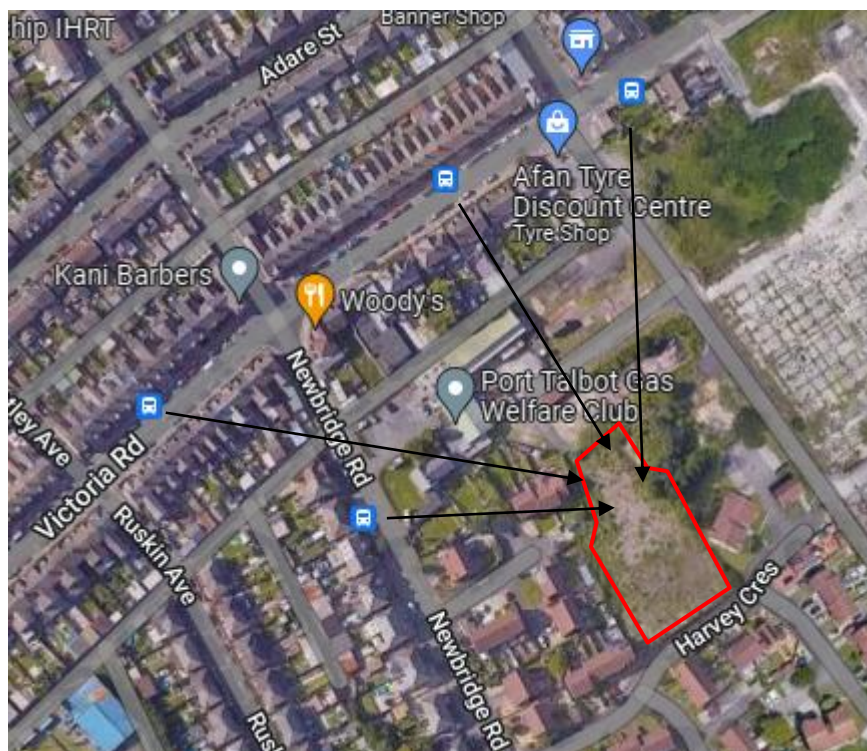
5.5 The re-use of suitable previously developed land and buildings, avoiding development on greenfield sites, is advocated through PPW – which states the following: *“Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.”*

5.6 It should also be noted that the proposed development will positively contribute to the LDP vision for 2026, which aims to build sustainable communities whilst safeguarding green spaces within the authority.

5.7 The proposed development will comply with the affordable housing policy SP8 through the creation of residential dwellings that will contribute to the overall supply that has been targeted within the area. In doing so, the urban design incorporated within the development reflects, improves and further enhances these elements that are found in the surrounding area of Harvey Crescent. The design approach taken for the new homes will seek to ensure cohesion and integration with the existing character and form of dwellings within the surrounding area.

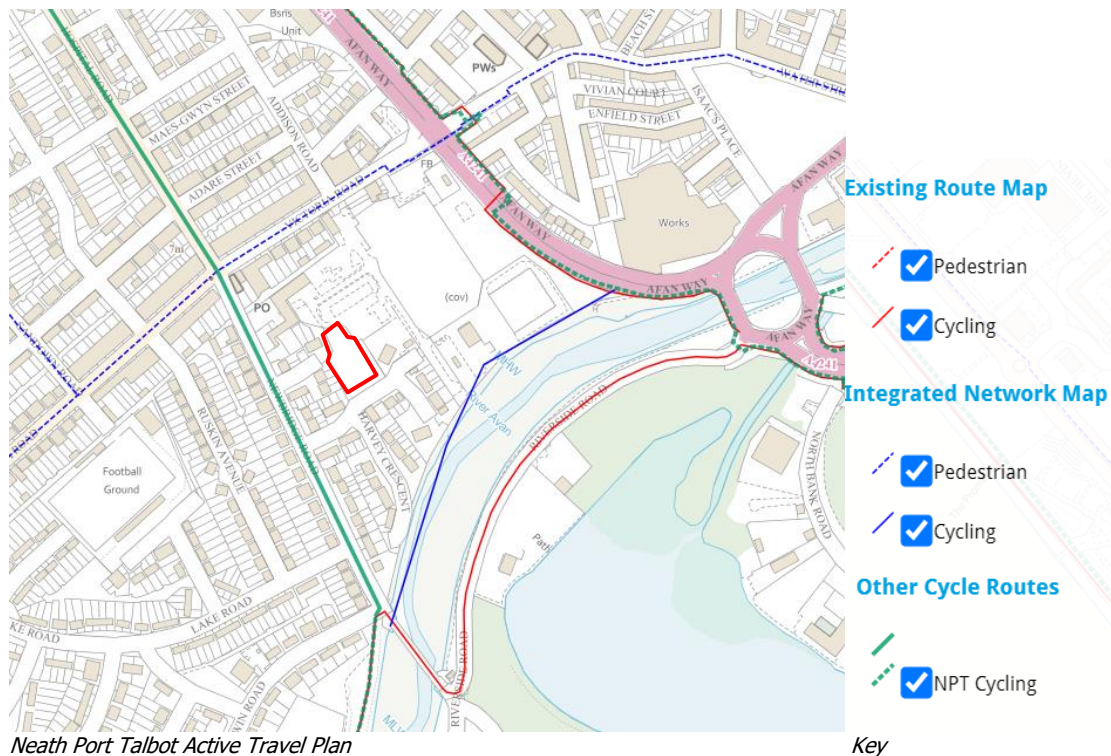
5.8 The proposed development will see the redevelopment of the of a site, which is contained within the settlement boundary and is in a highly sustainable location in close proximity to a variety of services and facilities contained with Port Talbot (identified as a ‘Key Settlement’ within the adopted LDP). As such it is considered that the proposed development would be in full accordance with the Local Development Plan.

- 5.9 As set out within this submission, the site sits in a sustainable location adjacent to a number of services and facilities that are within walking distance of the proposed development – given that it is sited within the settlement of Port Talbot.
- 5.10 The local services which are located within walking distance to the site include the following:
- Pharmacy – Well Port Talbot (140m);
 - Woody's Restaurant (140m);
 - Gino's Barbers (140m);
 - The Happy Wok (150m);
 - Afan Tyre Shop (160m);
 - Nisa Convenience Store (180m);
 - Port Talbot Town FC (240m);
 - Little Warren Playing Fields (390m);
- 5.11 The majority of local services, in particular retail, food & drink provision is located along Victoria Road which is sited north of the site.
- 5.12 It is considered that the site benefits from a wide variety of local amenities which would serve future residents of the proposed development.
- 5.13 In terms of public transport there are several bus stops within walking distance which provide services throughout Port Talbot, Neath and Margam, which would connect residents to wider areas. There is also a train station located 1.4 miles to the east, which is accessible via active transport.



Bus stops adjacent to the site

- 5.14 The site is also within proximity of several active travel routes designated by Neath Port Talbot's Active Travel Plan.



- 5.15 In light of the above, it is considered that the site is in an inherently sustainable location, that boasts excellent local amenity provision, as well as public transport links and active travel routes. Therefore, the proposal represents a sustainable form of development.
- 5.16 To summarise, it is considered that the proposal satisfies the Council's Plans for affordable housing and the principle of development at the site is considered acceptable.

Design

- 5.17 The proposals are for a high-quality and sustainable scheme, creating a more attractive and characterful place than the existing environment, which is currently characterised by bare ground.
- 5.18 The development at this site is to be built to an exceptionally high quality where the particular characteristics and the context of the environment and local settlement of Aberavon Crosses are considered – and where appropriate, enhanced.
- 5.19 It is considered that the proposals, which comprise a mix of single storey and two storey dwellings, are an appropriate form of development for the site / setting.
- 5.20 In terms of materials and finish, the units include the provision of high-quality materials, seeking to achieve a bespoke and contemporary finish to the properties. The proposed materials aim to provide a high-quality finish, which is considered to be an enhancement to the prevailing character in the area.
- 5.21 As noted previously, there is not considered to be any prevailing architectural style or character on the area. The proposals therefore present a functional yet modern and distinctive design, utilising a coherent materials palette. Soft landscaping is integral to the scheme, in the form of private and shared amenity space, and areas of planting, all of which will serve to soften the development and increase biodiversity value.

- 5.22 As illustrated in the Proposed Street Elevations, these dwellings have been designed to provide a strong outlook / frontage onto Harvey Crescent.

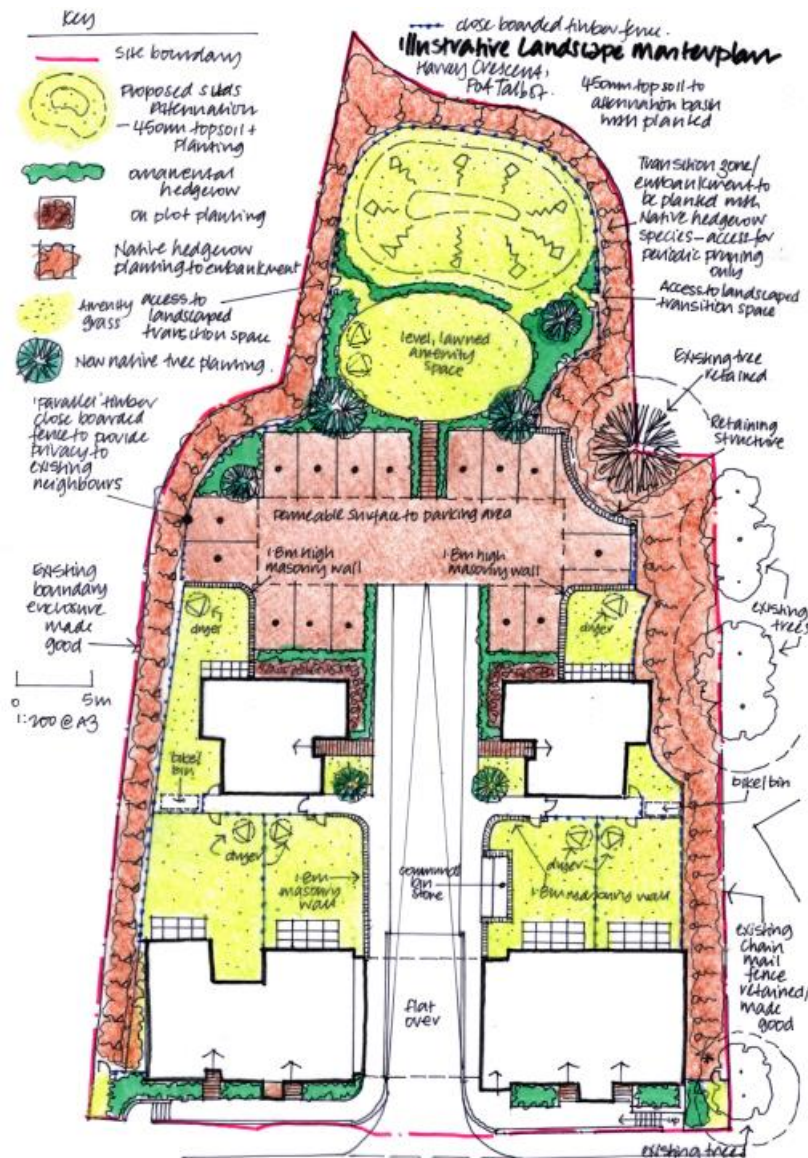


Proposed Street Elevation (Front)

- 5.23 The design and character of the development, as shown in the extract above, has been carefully considered within the context of the site's surroundings, and to ensure that it is in keep with the existing built form.
- 5.24 Overall, it is considered that the designs produced by Holder Mathias Architects are wholly suitable for the location and affordable housing needs, as well as compliant with local planning policy 'BE 1 'Design'.

Landscaping

- 5.25 To support the planning application, an Indicative Landscape Plan Masterplan is submitted, which details the proposed landscaping within the site. Specifically, detail pertaining to planting within the site is provided, including how plants will relate to SuDS features, as well as the implementation of native hedgerow planting to the embankment, amenity grass and new native tree planting.
- 5.26 Moreover, existing trees within the site along its boundary are to be retained, and form part of the landscaping plan. Overall, the site will benefit from excellent landscaping features, which will ensure biodiversity benefits are achieved to great effect.
- 5.27 An extract of the Plan is provided overleaf:



Indicative Landscape Masterplan

- 5.28 It is considered that full detail of the proposed landscaping, relating to exact mix of species, management and implementation of planting etc. will be conditioned as part of any permission.

Residential Amenity

Amenity Space

- 5.29 As demonstrated, on the proposed Site Plan, the units benefit from ample amenity space for leisure and recreation. For the houses and bungalows, this takes the form of a private back garden, whereas the apartment has access to the shared amenity space.

Privacy / Overlooking

- 5.30 The scale, orientation of the units and positioning of windows has been carefully considered to protect privacy. Additionally, the proposed dwellings are located a sufficient distance away from existing adjacent dwellings so that there is no risk of overlooking or the loss of natural

light. All of the dwellings have an outlook over the internal street layout, providing good surveillance and minimising opportunities for crime.

- 5.31 It is therefore considered that the proposal does not give rise to any amenity concerns.

Highways & Access

- 5.32 A Transport Statement has been prepared by Corun in support of the proposal.

Access

- 5.33 Vehicular access will be provided from Harvey Crescent, in the south of the site, comprising a slight relocation of the existing access. This access will be designed in accordance with local guidance, and will include dropped kerbs to ensure pedestrian movement along the existing Harvey Crescent footway is accommodated. It is considered that there will be no material change in highways movements to and from the site, in light of the previous use of the site, and therefore, it is considered that there will be no capacity issues.
- 5.34 An internal access road will lead north from the access junction, into a central courtyard within the site. Internal pedestrian footways will be provided through the site, connecting to the access points off all proposed units on the site. These footways will run along both edges of the internal access road carriageway, and along a raised and fenced route across the site frontage.
- 5.35 The visibility splays have been assessed in detail within the submitted Transport Statement and the proposed arrangements are considered to provide an acceptable solution that achieve highways safety.

Parking

- 5.36 It is proposed to include 14 parking spaces on the development site, with 1no. disabled parking provision (15no. in total). This equates to 2 spaces per dwelling, which satisfies the requirements of Policy SP20 of the NPT Local Development Plan.

Flood Risk & Drainage

- 5.37 The below extract from the NRW confirms that the site is within a flood zone C1, however, development is generally permitted in these areas. This is confirmed by TAN 15 as development risk is minimal in these areas.



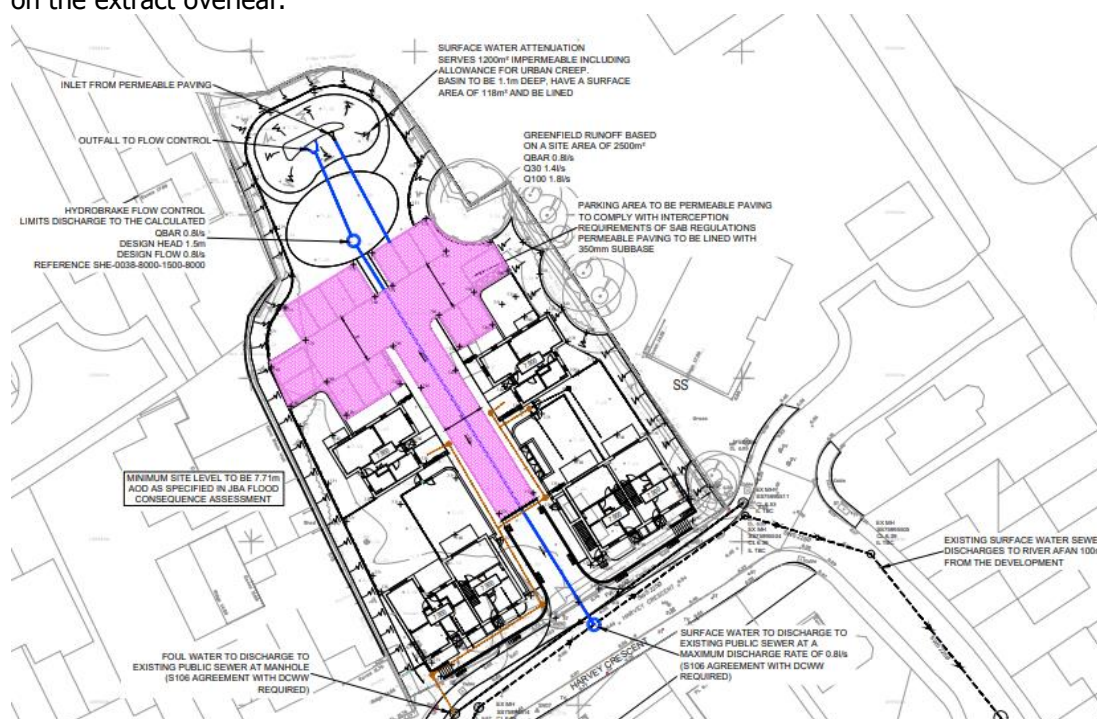
Extract from NRW, Development Advice Map (site shown by approximate red line)

5.38 This is also confirmed by an extract from the NRW flood map for planning, as shown below.



Extract of NRW Flood Map for Planning – Rivers (site shown by approximate red line)

- 5.39 A flood Consequences Assessment has been produced by JBA in support of the application. The assessment outlines that the levels of the site should be raised to 7.71mAOD, which is to be level with the 0.1% AEP plus climate change tidal flood event. As presented within the PHG Engineering Layout, the minimum site level is to be 7.71mAOD, in accordance with the recommendations of the FCA. This therefore alleviates any concerns pertaining to flood risk within the site.
- 5.40 In their report, JBA have confirmed that the site is not at risk of flooding from surface water and is at little to no risk of groundwater, sewer or reservoir flooding. Overall, the site is concluded to be compliant with Planning Policy Wales and TAN-15 on the grounds of flood risk.
- 5.41 An engineering layout produced by PHG consulting confirms that the site can support an appropriate drainage layout, with an attenuation area to the north, as well as the ability for surface water to discharge into the existing public sewer to the south. This is demonstrated on the extract overleaf.



Extract of engineering layout

- 5.42 In summary, it is considered that the site is entirely policy compliant on the grounds of flood risk and drainage, and that the scheme is appropriate in this location.

Ecology

- 5.43 An ecological survey has been undertaken on the site by Ecology Planning, to inform the ecological conditions of the site.
- 5.44 The survey found that the habitats within the site are of negligible ecological value, comprising almost exclusively bare ground with a small amount of scrub. In addition, the survey concluded that the site has negligible supporting value to off site habitat.
- 5.45 It is considered that the proposed tree planting scheme on site will enhance biodiversity activity, thus resulting in a net gain. Other enhancements including the provision of bat boxes

on the proposed dwellings will further assist in achieving a betterment – culminating in an acceptable scheme.

Trees

- 5.46 There are a number of trees scattered within the site, and particularly grouped in the along the north-east boundary of the site. A Tree Survey was undertaken by ArbTS in November 2022, which identified 5 medium quality trees and 3 low quality trees on the site. This is summarised in the table extracted below.

BSS837:2012 Quality Category	Total Number of Individual Trees Surveyed	Total Number of Tree Groups Surveyed	Total Number of Tree Areas Surveyed	Total Number of Woodland Areas Surveyed	Total Number of Hedgerows Surveyed	Total
A (High)	0	0	0	0	0	0
B (Medium)	5	0	0	0	0	5
C (Low)	3	0	0	0	0	3
U (Poor)	0	0	0	0	0	0
Total A,B,C,U	8	0	0	0	0	8

Tree Survey Summary Table

- 5.47 The tree survey report concluded that given no trees are intended to be removed, and with the appropriate tree protection measures implemented, where necessary, the proposed development will have no unacceptable aboricultural impact.

Other Issues

Public Rights of Way

- 5.48 The below extract from the NPT council's LDP proposals map demonstrates that there are no Public Rights of Ways on or adjacent to the site.



Public Right of Way Map

Heritage

- 5.49 As shown on the Historic Wales map extract included below, there are no heritage features or assets on or in proximity to the site which could be affected. The site also does not lie within or close to a Conservation Area.



Historic Wales Map

6.0 SUMMARY AND CONCLUSIONS

Purpose of this Statement

- 6.1 This Planning Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development. The detailed assessments undertaken and reported are considered to allow the proposals to be viewed favourably.

Summary of Key Considerations

- 6.2 The proposals are considered to accord with planning policies at both the national and local level. In particular, it is considered that there are a number of material considerations in support of the application, which include the following:
- The principle of development is considered to be acceptable, in line with both national and local planning policies;
 - The detailed design of the proposals is considered to be sensitive in form, scale and mass – reflecting the existing character and scale of the existing development in the wider and immediate surrounds;
 - The site layout is considered to be of a sensitive design which does not result in any unacceptable impacts upon the residential amenity of the surrounding areas;
 - The development is compliant with LDP policy SP8 with its affordable housing provision;
 - The application is supported by an FCA which confirms that the development is not unacceptable in respect of flood risk;
 - The site is inherently sustainable, given the vast opportunities to access local amenities and with the provision of public transport in the locality;
 - The proposed high-quality materials aim to be complementary to, and reflect the character of the surrounding area;
 - The proposal is acceptable on highways grounds, and will not give rise to any safety issues; and
 - There is no other technical constraint which might restrict its development.

Conclusion

- 6.3 Having regard to the above material considerations, it is considered that the proposed development represents an appropriate scheme in Aberavon and complements the surrounding area. Accordingly, we would respectfully request that the application be approved.