



Planning Services
Neath Port Talbot County Borough Council
The Quay
Brunel Way
Baglan Energy Park
Neath
SA11 2GG

14th July 2023

Dear Sir / Madam,

**Full Planning Application for to the Reconstruction and Re-Siting of a Security Gate and Adjoining Wall and Piers
Dream Fields, Llandarcy, Neath, SA10 6JU**

This covering letter has been prepared by Simply Planning Limited ('SPL') on behalf of our client, Mr Jonathan Hale, and is submitted in support of a planning application for the removal of the existing five bar gate and the replacement with a modern electronic security gate, erection of adjoining walls and piers to the replacement gate, and the resurfacing of the existing access at Dream Fields, Llandarcy, Neath, SA10 6JU.

The full description of development is as follows:

"The resurfacing of access, reconstruction and re-siting of a security gate, adjoining wall, piers and ancillary works"

In support of this full planning application, the following plans and documents are submitted for consideration by the Local Planning Authority;

- Covering Planning Letter, prepared by Simply Planning Ltd;
- Southern Wall Technical Note, prepared by CB3 Consult Ltd; and
- Architectural Plans and Drawings, prepared by Dewi Evans Architect, and CGI images, prepared by Chamberlain Moss King consisting of the following:

Document Title	Document Reference
Site Location Plan	2104-24
Entrance Plan	2104-18A
Site Entrance - Elevations	2104-20A
Masonry Edging Details	2104-21A
Site Entrance – Visibility Splays 1	2104-26
Site Entrance – Visibility Splays 2	2104-27
Entrance Landscaping Plan	2104-28
CGI – Perspective 1	N395-A-A01

Document Title	Document Reference
CGI – Perspective 2	N395-A-A02
CGI – Perspective 3	N395-A-A03

The planning application fee of £230 will be paid to the Local Planning Authority upon submission of the application. Once the fee has been received, we consider that all the local and national validation checklist requirements will have been met and the application can be validated accordingly.

Site Context and Planning Background

This planning application relates to the access to the site of Dream Fields, Llandarcy, which is a large farm holding on the western side of the of the B4290.



The property has recently changed names and was formerly known as Gelli Bwch Farm and was purchased by the applicant, Mr Jonathan Hale, in January 2022. Since the purchase of the land it became apparent that the access was sub-par, with at least two traffic incidents occurring at the entrance to the site within the last 12 months. The applicant has subsequently tried to rectify this issue, to prevent a more serious traffic infringement occurring as a result of the sub-standard access.

The subject of this full planning application does not relate to all of the land associated with the farm, but focuses only on the access to the site, which is located on the eastern boundary. Access is gained from the B4290, at the point in the road where speeds change from 30mph to 40mph. Images of the existing access, taken from Google Maps, is located below:



Image of access approached from north



Image of access approached from south

Policy Constraints

The application site falls within the boundaries of Neath Port Talbot County Borough Council (NPT) and so the Development Plan for the determination of any Planning Applications at the site would be the 'Neath Port Talbot Local Development Plan 2011-2026' (adopted January 2016) ('LDP'). Provided below is an extract of the LDP Proposals Map which shows the application site.



LDP Proposals Map Extract

The LDP Proposals Map shows that the site is:

- Contained within the Coastal Corridor Strategy Area;
- Outside of an identified settlement limit;
- Within a Green Wedge;
- Within a Settlement Protection Zone; and
- Contained within a Mineral Safeguarding Area.

The LDP proposals map does not assess all the constraints which might be included in the land. Therefore, further consideration is given in the table below as to any other constraints that might be within the site and that would be material to any future planning application at the site.

Constraint	Commentary
Flood Risk	The NRW TAN15 Development Advice Map shows that the site is within Flood Zone A and is at little or no risk of flooding. The Flood Map for Planning for Wales shows that the site is within Flood Zone 1 and is at little or no risk of flooding.
Ecology	The site is not located within any sites designated for ecology or biodiversity conservation. Crymlyn Bog, a designated Special Area of Conservation, Site of Special Scientific Interest and National Nature Reserve, is located approximately 540m south of the site.
Phosphates	The Welsh Government Data Map shows that the site does not fall within the catchment area for any Special Area for Conservation with increased levels of phosphates.

Constraint	Commentary
Heritage	The site contains no Listed Buildings or Scheduled Ancient Monuments and is not within a Conservation Area. Due to the small scale of the proposed development, there are no scheduled monuments or listed buildings in the near area that would be impacted by the scheme.
Coal Mining	The site falls outside of a Coal Mining High Risk Area.

Planning History

A planning history search undertaken via the Neath Port Talbot County Borough Council website shows a number of planning applications on the site, which are as follows:

Planning Reference	Description	Decision	Decision Date
N1982/0083	Dwelling for agricultural worker	Refused	15th February 1982
N1985/0045	Conservation of outbuilding to living accommodation	Granted	19th February 1985
N1985/0241	Amendment of Planning Approval 85/0045/003 for conversion and extension of outbuilding to living accommodation	Granted	3rd June 1985
N1985/0600	Installation of Septic Tank to serve proposed Granny Flat Extension	Granted	18th November 1985
N1995/0531	New farmhouse to replace existing	Refused	8th January 1996
P2001/0527	Erection of stables (12 No boxes) and store for use of public	Granted	24th July 2001
P2013/0894	Request for EIA screening opinion for the erection of a wind turbine with height of 79.6m to tip	Not EIA Development	28th October 2013
P2023/0182	Erection of new outbuilding to house poultry, farm equipment, hay, and 2 no. biomass boilers with solar panels on the roof	Pending	TBD

There has been a number of historical planning applications at the site. However, these have been determined prior to the adoption of the LDP, Future Wales 2040 and Planning Policy Wales edition 11. As such, these are not considered to be material to any future planning application at the site. The most recent application (ref: P2023/0182) for the erection of an outbuilding has yet to be determined.

Pre-application advice was sought from NPT regarding this proposed development. A virtual meeting with the Case Officer, Claire Hall, took place on 23/03/2023. The meeting was broadly positive towards the development, although some changes and further information was requested.

Visibility Splays were requested, which demonstrate that 2.4m x 120m was visible in both directions, in accordance with Technical Advice Note 18: Transport (TAN18). Accompanying this application are plans which demonstrate that the required visibility splays are achievable in both directions (drawing refs: 2104-26 & 2104-27).

In addition, further information was requested regarding mitigating landscaping for the proposals. Accompanying this application is an Entrance Landscaping Plan (drawing ref: 2104-28), which shows the extent of planting proposed. This is discussed in greater length under the 'Key Material Considerations' heading below.

The Case Officer requested that the materiality was given further thought. Revisions have been made following the meeting and these are discussed under the 'Key Material Considerations' heading below.

Finally, the Case Officer requested further information regarding the drainage of the site, and regarding the suitability of the dwarf retaining wall. An Entrance Plan (drawing ref: 2104-18A) has been submitted to provide the required information, whilst a Technical Note, prepared by CB3 Consult, demonstrates the suitability of the retaining wall.

Proposed Development

This application seeks planning permission for the re-siting of the security gate, erection of adjoining walls and piers, and resurfacing of the access. The development proposed at the site consists of the following:

- Removal of existing five bar gate;
- Provision of electronic security gate;
- Erection of adjoining wall and piers;
- Resurfacing of access.

Below is a CGI image of the proposed works.



To the south (left) of the security gate, the wall remains below 1m at all stages. To the north (right) of the security gate, the wall is lower than 2m in height and at its closest point, is located 7.4m from the highway. The security gate and adjacent pillars are less than 2m in height.

The walls will consist of random rubble stonework, which will be derived from local and reclaimed stone, to ensure that the proposed works reflect the local vernacular and will be congruous with its surroundings. Bush hammered dressed stone will be used for the copings and gate pillars.

Key Material Considerations

The application site falls within the boundaries of Neath Port Talbot County Borough Council and so the Development Plan for the determination of the planning applications at the site would be Future Wales: The National Plan 2040 (adopted February 2021) and the 'Neath Port Talbot Local Development Plan 2011-2026' ('LDP'). Also of relevance is national planning guidance, Planning Policy Wales 11 ('PPW11') and the Technical Advice Notes. Of particular relevance to the proposed works is Technical Advice Note 18 – Transport ('TAN18'). Llwyber Newydd: the Wales Transport Strategy 2021 ('WTS') sets out the Welsh Governments approach to the transport system over the next 20 years.

After reviewing the above Planning Policy context, we consider the key material consideration to be highway safety and design. The proposed development is assessed against the identified local and national planning policies below.

Highway Safety

Policy SP20 (Transport Network) of the NPT LDP requires development proposals to be designed to provide safe and efficient access. Policy TR2 (Design and Access of New Development) advises that development proposals will only be permitted where the development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety; and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use.

Paragraph 2.2 of TAN18 emphasises that PPW and the Wales Transport Strategy both aim to improve road safety. Paragraph 4.1.47 of PPW states that in established urban and rural neighbourhoods, changes to the street design should be adopted to improve the street environment and promote road safety. Further, paragraph 5.3.10 of the same document states that at any location, traffic flow and safety can be assisted by good junction design. On page 18 of the WTS, it advises that the Welsh Government will use inclusive design principles in infrastructure projects to improve accessibility and safety for everyone.

From existing local and national policy, it is clear that highway safety is of significant importance to all involved in the planning system. As previously stated, in the brief time that the applicant has owned the land, he has been made aware of 2 traffic incidents due to the insufficient access. The applicant has also been made aware that further traffic incidents have taken place prior under the previous ownership. As such, the principle of improving the safety of the access is acceptable and should be encouraged.

To improve the safety of the access, the existing gate, which is located 5.8m from the highway has been removed and a new security gate is proposed which is located 18m from the highway. This increased distance allows for a long farm vehicle to move off of the highway whilst waiting for the gate to be opened, preventing obstruction of the highway and the safety risks that this would entail. A planning application (planning ref: P2023/0182) has been submitted to the Council which seeks the erection of an outbuilding to house poultry, farm equipment, hay, and 2

no. biomass boilers. Whilst not a significant increase, there will be a greater number of large vehicles utilising the site, and consequently the access, which would greatly benefit from being able to pull off the highway whilst awaiting the gate to open.

Annex B of TAN18 sets out visibility splay standards within Wales. The junction sits on the border of a 30mph and 40mph zone, however, a Speed Survey undertaken by Vectos recorded speeds of 47mph travelling from the south and 49.1mph travelling from the north. As part of the pre-application meeting with the Council, it was requested that 2.4m x 120m visibility splays were provided in both directions. Drawings references 2104-26 and 2104-27 show that these visibility splays can be achieved with only minor trimming of the trees and hedges to the south of the access. These trees and hedges are partly within the applicant's land and partly part of the public highway. Therefore, these 2.4m x 120m are achievable and sufficient visibility for the recorded speeds and therefore is acceptable for highway safety.

Paragraph 5.10 of TAN18 advises that the design of new streets should be considered in the context of the particular location. Carriageway widths should be appropriate to the particular context and the street character. As the track services a farm and three dwellings, this is very low intensity use. Even should the application for the proposed outbuilding be granted, this will not result in a significant increase in traffic movements. Passing places are available further up the track and therefore an access width of 4m is appropriate to the context of the area and use.

The access is proposed to be re-surfaced. This would increase the safety of any private cars which use the track, as cars must currently turn into the site from the highway at very slow speeds to prevent any suspension or tyre damage.

Design of Access

LDP Policy BE1 (Design) states:

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. Proposals will only be permitted where all of the following criteria, where relevant, are satisfied. The relevant criteria are as follows:

- 1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;*
- 2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;*
- 3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;*
- 4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;*
- 5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;*

6. *It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);*
7. *Its drainage systems are designed to limit surface water run-off and food risk and prevent pollution.*

Criteria 1 of Policy BE1 requires development to complement and enhance the character and appearance of the site. The existing access consists of an unsurfaced dirt track and old steel bar gate. Whilst it is accepted that this is a traditional farm access often found within the countryside, the site appears tired and run down as a result of the boundary being marked by felled tree trunks and a rusted steel gate. The proposed works are aesthetically an improvement on the current arrangement, with the stonework and gate rejuvenating the appearance of the site.

Criteria 2 advises that development must respect the context of the site, whilst criteria 3 states that proposals should utilise materials appropriate to its surroundings. The walls to be erected will consist of random rubble stonework, which will be derived from reclaimed and local stone. Stone will also be used for the copings and gate pillars. As this material derives from, and is widely used in, the surrounding area, the scheme clearly respects the local context. In regard to soft landscaping, significant planting has been proposed around the development, to soften its appearance and to further reduce any potential urbanising impact. A number of trees are already present on site. To complement these, hedges are proposed to the rear of the low wall to the south of the access and further hedges proposed to the front and beyond the wall to the north of the access. Directly in front of the wall to the right of the access, when seen from the road, with shrubs planted between these bulbs and the hedges. The Landscaping Plan (drawing ref: 2104-28) which accompanies this application demonstrates this landscaping, including species, in more detail.

A CGI image of the scheme is shown below.



During the pre-application meeting, the Case Officer discussed exploring the possibility of using a yellow brick edged coping stone as used in one of the barns which has fallen into poor condition within the wider farmland, an image of the barn and coping stone suggested is shown below:



The use of the yellow coping stone was explored, however it was considered that the type, colour and pattern of the stone resulted in producing an urbanising effect upon the access. Whilst the yellow stone is used on this barn, it is not prevalent within the wider site and there are no other examples of this stone being used within the wider rural area. In addition, this type of stone, with the colouring and pattern, is traditionally found in urban and suburban residential areas. Therefore, it was considered that the proposed stone was more appropriate for the rural area.

Despite the rural location, there is a large junction located opposite the site, for access to Edward Works. Therefore, the proposed access could not be considered to be urbanising the rural environment, given its modest size in comparison with the opposite junction.

Criteria 4 requires the design of a scheme to ensure that it would not significantly adversely impact highway safety. Highway safety has been discussed at length in the previous section. To summarise, the current arrangement clearly significantly impacts road safety, with little space to pull off the highway to open the gate, an uneven road speed to drastically reduce the speed which turning into the site can be undertaken, and recorded speeds of 49.1mph. The scheme proposed surfacing the access and providing greater space for vehicles to pull off the highway. The design of the access, with walls that can partially be seen from further north and south of the highway, increases safety as drivers are able to see where a car is turning. Currently, the access is hidden and drivers often are unaware of where a car is turning, increasing the chances of a collision.

Of the remaining criteria of Policy BE1, only criteria 9 is considered directly relevant to the scheme, which is discussed below. There will be no negative impact upon the green infrastructure, biodiversity and ecological connectivity by the scheme and the additional planting will result in a biodiversity net gain, which should be seen as a benefit of the proposals. The proposed development will improve the attractiveness of the space and the development should be considered in accordance with Policy BE1 and acceptable on design grounds.

Drainage

Criteria 9 of Policy BE1 advises that drainage systems should be designed to limit surface water run-off. The Site Entrance Plan (drawing ref: 2104-18A) which accompanies this planning application shows the drainage details for the site. This includes sloping depth drainage channels and 100mm drainage pipes which discharge into the existing stream. Further information is available by consulting the Site Entrance Plan. The scheme has been designed to limit surface water run-off and complies with Policy BE1 of the LDP.

Summary and Conclusion

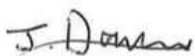
In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan, unless other material considerations indicate otherwise. The relevant development plan for the area is the Neath Port Talbot County Borough Council Local Development Plan 2011-2026 (LDP).

The proposals would result in a drastic increase in highway safety, which is greatly needed. The proposed scheme allows for vehicles to pull off the highway as they await the opening of the gate. The surfacing of the access also reduces the probability of damage to vehicles as they leave the highway. This ensures that the scheme is in compliance with Policies SP20 (Transport Network) and TR2 (Design and Access of New Development) of the LDP and TAN18.

The scheme improves the appearance of the access, using locally sourced and reclaimed stonework which ensures the materials are appropriate to the local area. This, coupled with the design, ensures that the scheme respects and retains the local vernacular, and complements and enhances the character and appearance of the access and wider area. Soft landscape has been used to soften the appearance of the site and drainage measures have been incorporated to limit surface water run-off. Therefore, the scheme is in compliance with LDP Policy BE1 (Design).

The proposed scheme is consistent with all relevant local and national policies. Therefore, we consider that planning permission can be granted for the resurfacing of access, reconstruction and re-siting of a security gate, adjoining wall and piers at the application site.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'J. Downey'.

Josh Downey

Senior Planner

Enc.