

LAND AT MARGAM STREET, CYMMER, NEATH PORT
TALBOT COUNTY BOROUGH COUNCIL.

PROPOSAL FOR PLANNING PERMISSION FOR FOUR DETACHED
DWELLINGS

PLANNING STATEMENT

FEBRUARY, 2023



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1. PURPOSE OF THIS PLANNING STATEMENT

This document provides an overview of the planning position and proposal for the construction of 4 detached dwellings having considered the National Policy position, the Local Policy position as well as taking into account matters relevant to the post-Covid issues material to the consideration of this application.

The Planning Statement is structured such that it outlines the following;

1. Purpose of this Planning Statement
2. Executive Summary;
3. Site Location Plan and Block Plan;
4. Proposed Development;
5. Statement of Justification;
6. National Policy Context;
7. Local Planning Policy Context;
8. Summary of Material Considerations;
9. Summary.

2. EXECUTIVE SUMMARY

This application seeks to develop a site located in the very heart of the village of Cymmer. The site was that of a repair garage and yard associated with it which is no longer in operation.

This development is commensurate with Policies contained within the Neath Port Talbot Local Development Plan (2016). As such, this proposal is modest in its size and will be sensitively located in order that it will seamlessly blend in with the existing streetscene. The fact that most of the site disappears from view being a level site where Margam Road itself rises to join School Road. This will allow the development to “nestle” into the valley side and not therefore conflict with the unique vernacular this valley presents.

This proposal has been formulated having regard to a detailed consideration of the constraints and opportunities as well as detailed analysis of current planning guidance. It also takes into consideration the

impacts Covid-19 is having on the economy and the need to develop an appropriate recovery that supports well-being.

The site is within the settlement limit of Cymmer within the Neath Port Talbot Local Development Plan (2016).

3. SITE LOCATION PLAN AND BLOCK PLAN



4. SITE DESCRIPTION AND PROPOSAL

The site lies at the very centre of Cymmer. As such, the site is generously provided with access to facilities ranging from the local infants and junior school, retail, health, library and all manner of leisure

pursuits being in the Afan Valley and close to Glyncorrwg. Most importantly, this access can be by way of Active Travel means.

Cymmer lies mid-way up the Afan Valley with a short commute/bus ride to Port Talbot as well as access to Caerau and Bridgend beyond.

The site contains a closed garage building built some years ago and is showing its age. There are also a couple of lean-to additions which are in a poor state of repair and appearance. The remainder of the site is covered in tarmac and was used for the parking of vehicles.

The empty building is immediately adjacent to a residential property at no.127 Margam Road and opposite nos. 123,124 and 125 Margam Road. The site also extends below Cymmer Fish Bar and the building which was once a Glyncorrwg Urban District Council Building which has now been converted into a residential property.

The site itself is level but Margam Road itself slopes gently up past the site. The intention is to set the properties back from the edge of highway with their position which will set the development within its surroundings. This will ensure the development will not present a stark “new” presence on the street scene which would be out of keeping. It is accepted that this development should “fit like a glove” into its environment and seek to blend in, surrounded by mature trees and vegetation which are located adjacent to the rear of the site.

The proposal is for four modern, well insulated, detached dwellings.

Plot 1 is for a 4 bed property containing 3 parking spaces with storage in the rear garden for cycles/mobility scooter.

Plot 2 is for a 4 bed property containing 3 parking spaces with storage in the rear garden for cycles/mobility scooter.

Plot 3 is for a 3 bed property containing 3 parking spaces with storage in the rear garden for cycles/mobility scooter.

Finally, Plot 4 is for a 4 bed property containing 3 parking spaces with storage in the rear garden for cycles/mobility scooter.

Each property has space in the rear garden for recycling and there is a station directly adjacent to kerbside where recycling can be left on collection day.

5. STATEMENT OF JUSTIFICATION

Back in 2021 a pre-application enquiry was submitted Q2021/0252 for the demolition of the garage and the construction of an 8 terrace, each containing two bedrooms. It was noted that the response focussed on EC4 and the “loss” of an employment use within the village.

It must be noted that EC4 refers to employment use defined in EC3 and /or within existing areas defined in EC2. EC3 relates to allocated and existing employment areas and EC2 refers to Existing Employment areas. Paragraph 5.2.24 goes on to expand that it is recognised that development for employment uses on some sites may become unviable over the Plan period as the economy continues to change.

Although this application is for four properties which is different to the pre-application we have produced a Statement of Justification to clarify the proposed development.

In response the subsequent statement has four sections;

- Precedent
- Neath Port Talbot Local Development Plan Review Report
- Neath Port Talbot Local Development Plan Annual Monitoring Report (October 2022)
- Average Annual Requirement (October 2022)
- Summary

PRECEDENT

Whilst this is not a comprehensive list, the examples given seek to show that there are examples close to the application site as well as across the Authority that highlight where it has been acceptable to grant

permission on former employment sites and allow a more acceptable use on the land;

P2013/0038 Alltwen Industrial Estate – The demolition of 8 industrial units and the construction of 34 dwellings.

This was refused and led to an appeal A2014/0008. This was refused at appeal and led to an application to the High Court
APP/Y6930/A/14/2218029

Lear Investments vs Welsh Ministers – This was an application to the High Court under Section 288 of the Town and Country Planning Act 1990 by Lear Investments to quash a decision letter of an Inspector appointed by the Welsh Ministers.

Key issues in the decision to allow the development of the 34 houses was the buildings had reached the end of their useful life. It also concluded that the site had the potential to be a bad neighbour both in relation to noise (smell) and no restrictions to operational hours.

The construction of the building was also focussed upon in terms of its inadequate insulation, out-of-date heating and whole electrical system needing extensive maintenance and repair.

P2017/0249 Old Fire Station, Brytwyn Road, Cymmer – permission was granted for 3 detached dwellings in close proximity to this application. It was stated that as the proposal here was within settlement limit and there were no adverse effects on visual and residential properties and did not impact on highway and pedestrian safety.

There was no mention that the site was in fact a lumber yard with a retail counter for a number of years.

P2014/0550 Holly Street, Pontardawe - Demolition of redundant foundry building. Permission was granted as the site had been the subject of countless complaints of smell and smoke over the years. As it was a foundry, it was in operation constantly and in close proximity to houses, commercial properties and community facilities.

The site was subsequently included as a housing allocation H1/LB/32 for 45 dwellings in the Neath Port Talbot Local Development Plan (January 2016).

- It must be noted here that Table 5.3 in the Neath Port Talbot Local Development Plan (January 2016) titled “Distribution of Overall Housing Provision indicates no Land-bank or New Allocations but expects 39 windfall properties and 65 small sites.

NEATH PORT TALBOT LOCAL DEVELOPMENT PLAN REVIEW REPORT (JULY 2020)

In order to ensure that there is a regular and comprehensive assessment of whether plans remain up-to-date the Council is statutorily required under Section 69 of the Planning and Compulsory Purchase Act 2004 to undertake a full review of the adopted Local Development Plan.

Strategic Policy 7 – Housing Requirement made provision to deliver 7,800 homes to support employment growth. The Review Report states that the revised Planning Policy Wales introduces the concept of Place-making which is a key element in developing sustainable places that will promote healthier lifestyles and meet the requirements of the Well-being of Future Generations Act 2015. Authorities should understand their local housing market and should identify a housing requirement that is realistic and deliverable and considers all members of the community. Future plans should therefore cater for the housing needs of all and allocate sufficient land in the most appropriate places to create inclusive communities that are attractive, accessible, active and healthy, creating prosperity for all. The focus is therefore not just about meeting housing demand but ensuring that place-making is at the heart of new development.

The Review Report goes on to state that housing delivery has fallen significantly below the targets set within the monitoring framework with an average delivery rate between 2011/12 and 2018/19 of 230 homes per annum compared with a requirement of 448 homes per annum.

Viability has been cited as a major concern by developers, impacted heavily by various planning obligations coupled with limited interest to develop in Neath Port Talbot.

It must be noted that the growth strategy of the Neath Port Talbot Local Development Plan (January 2016) does state that there will be a “*flexible approach to development in the valley communities*” 2.3.10

NEATH PORT TALBOT LOCAL DEVELOPMENT PLAN ANNUAL MONITORING REPORT (OCTOBER 2022)

The Neath Port Talbot Local Development Plan Annual Monitoring Report (October 2022) confirms that the shortfall in house building has not changed. In 2021/22 the cumulative completions as a percentage of the Local Development Plan target is 44%.

AVERAGE ANNUAL REQUIREMENT (OCTOBER 2022)

In March 2020 the Welsh Government published the Development Plan Manual (Edition 3) which introduced a requirement for Annual Monitoring Reports to include up-to-date Housing Trajectory and compare the actual delivery of housing against the Average Annual Requirement (AAR). The AAR for Neath Port Talbot is 495 units and the cumulative delivery as a percentage stands is at about 45%. The Council attempting to understand why this is the case but again looks for windfall and small sites to play their part.

SUMMARY

In conclusion, the justification for this development is comprehensive. The ceased use has reached the end of its useful life. It was a bad neighbour due to its proximity to residential dwellings, potential for noise, smells, disturbance through the movement of vehicles and systems of working. Hours of working could also be a potential problem.

The Well-being of Future Generations Act requires us to consider development that will be “better” for future generations. Place-making

expects development which will “fit like a glove” in its location, is sustainable in terms of access to active travel movement.

It must also be stressed that a flexible approach is required for growth in the valleys and whilst the Local Development Plan Housing targets are falling far short, windfall and small sites are expected to play their part and this site plays its part in delivering these homes.

6. NATIONAL PLANNING POLICY CONTEXT

A review of the National Planning Policy context associated with the site and proposed development is provided within this section of the planning statement. The planning policies and guidance of relevance to the consideration of the proposal are set out below;

FUTURE WALES - THE NATIONAL PLAN 2040 (February 2021)

Published in February 2021 Future Wales is the first development plan in Wales that seeks to sustain and develop a vibrant the economy, achieve de-carbonisation and climate resilience, developing strong ecosystems and improving health and well-being of our communities.

The planning system should contribute to shaping places around a vision for healthy and resilient places.

PLANNING POLICY WALES 11 (February 2021)

Adopted in February 2021 Planning Policy Wales is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications. PPW 11 sets out the land use policies of the Welsh Government.

The planning objective of PPW 11 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.

Sustainable development is defined as “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action in accordance with the sustainable development principle, aimed at achieving the well-being goals. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs”.

The Well-being of Future generations Act is further explored in Section 1 of PPW 11 within which 7 goals are further discussed. The goals are intended to shape the work of all public bodies in Wales and are listed as follows;

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and
- A globally responsible Wales.

Under Section 2 – People and Places – Achieving Well-being through Placemaking . 5 key Planning Principles are highlighted under the general heading of Achieving the Right Development in the Right Place which are;

1. Growing Wales’s economy in a sustainable manner;
2. Making best use of resources;
3. Facilitating accessible and healthy environments;
4. Creating and sustaining communities;
5. Maximising environmental impacts and minimising environmental impacts.

6. LLWYBR NEWYDD – A NEW WALES STRATEGY CONSULTATION NOVEMBER 2020 – JANUARY 2021

This Welsh Government strategy will shape the future of transport in Wales for the next 20 years. There are five priorities listed in the strategy and the number that relate to active travel and carbon emission reduction give a clear indication of their intent to see that development is accessible. The priorities include;

1. Reduce greenhouse gases; greater homeworking, 20 minute neighbourhoods, town centre first approach;
2. Grow public transport use;
3. Accessible transport structure including walking and cycling;
4. Making sustainable transport choices more attractive;
5. Support innovations that develop sustainable transport choices.

BUILDING BETTER PLACES – THE PLANNING SYSTEM DELIVERING RESILIENT AND BRIGHTER FUTURES – PLACEMAKING AND THE COVID-19 RECOVERY (July 2020)

Building Better Places sets out the Welsh Government's Planning Policy priorities to assist in taking action in the recovery period after Covid – 19. Recovery shall not be at the expense of quality. The need to fully embrace placemaking which has multiple benefits indicating that this not only helps improve quality of life but helps to tackle climate change.

PLACEMAKING WALES CHARTER (September 2020)

The aims of placemaking include the way places are planned, designed, developed and managed which has the potential to positively shape where and how people will live, work, socialise, move about and engage. Placemaking is ensuring that each new development contributes positively to creating or enhancing environments within which people can thrive. It places people at the heart of the process and results in places that are vibrant, have clear identity and where people can develop a sense of belonging.

The Charter outlines 6 principles that cover the range of considerations that contribute to establishing and maintaining good places. They include location – the location of housing to help reduce the need to travel; Movement – a wider active travel network.

Good places will not be dependent on private car use. Reducing car use will help to reduce carbon emissions.

THE WELL-BEING OF FUTURE GENERATIONS ACT (WALES) (2015)

The Well-Being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people to prevent persistent problems such as poverty, health inequalities and climate change.

The Future Generations Act defines Sustainable Development in Wales as the process of improving the economic, social, environmental and cultural well-being of Wales by taking action in accordance with the sustainable development principle aimed at achieving well-being goals. The Act seeks an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change).

TECHNICAL ADVICE NOTES

Technical Advice Notes (TANs) supplement the policy principles of PPW and add further detail on issues which might affect development potential of the site. The TAN which is considered relevant to the proposal and should therefore be given weight is;

TECHNICAL ADVICE NOTE (TAN) 12 – DESIGN (March 2016)

Further detail guidance on the objectives of good design is provided within TAN12. 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.

7. NEATH PORT TALBOT COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN POLICIES STRATEGIC DEVELOPMENT PLAN POLICIES

The Neath Port Talbot Local Development Plan was adopted in January 2016.

Policy SP1- CLIMATE CHANGE

The efficiency and sustainability of the County's settlements will be enhanced developing more cohesive and efficient settlements with more sustainable travel.

Dependence on the private car will be reduced by alternative means of transport.

Policy SP2 - HEALTH

Healthier more active lifestyles will be encouraged.

Policy SP3 – SUSTAINABLE COMMUNITIES

The delivery of sustainable, healthy and cohesive communities.

Policy SP7 – HOUSING REQUIREMENTS

Policy SP8 – AFFORDABLE HOUSING – there is no requirement for an affordable housing contribution in the Afan Valley.

Policy SP10 – OPEN SPACE

The threshold is not met.

Policy SP11 – Employment Growth

Policy SP15 – Biodiversity and Geodiversity

Policy SP 19 – WASTE MANAGEMENT

There is recycling storage area designed into the site in order that all residents can cleanly and safely separate all recycling streams so that as much is recycled and re-used through joining the Council refuse collection facility.

Policy SP20 – TRANSPORT NETWORK

Both vehicle and cycle parking is provided on site. This ensures that adequate standards are maintained and that residents can also benefit from owning a cycle and using it for active travel journeys.

SUPPLEMENTARY PLANNING GUIDANCE;

PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING GUIDANCE (October 2016)

- A planning obligation must be relevant to planning and necessary to make the proposed development acceptable in planning terms;
- Directly related to the proposed development;
- Fair and reasonable in the context and scale and type of development.

Paragraph 3.5.3 states that for some planning obligations, the identification of a set of formula which can be applied consistently in specific circumstances to calculate the scale of the obligation provides a level of predictability and clarity with the process for the benefit of all parties.

Paragraph 4.5.1 of the SPG also rightly highlights that the financial viability of a development will be one of the key factors in determining

the scale of obligations that could be secured through Section 106 agreement.

Paragraph 4.5.2 there may be occasions when not all of the identified obligations can be met without compromising the overall viability of a particular development. If a scheme is not financially viable then there is a high risk that a scheme may not proceed.

Paragraph 4.5.3 in these circumstances the possibility of reducing the identified contribution will be explored further.

All relevant details of the scheme will be provided in order to establish if any contribution can be made in relation to the development.

CATEGORIES OF PLANNING OBLIGATION;

AFFORDABLE HOUSING

There is no Affordable Housing contribution required in the Afan Valley.

TRANSPORTATION AND ACCESS

The nature and scale of this scheme has minimal impact on the highway network.

NEW OR IMPROVED CYCLE / PEDESTRIAN ROUTES

This is an edge of kerb development with easy access to those active travel routes in this part of the Afan Valley. There is therefore no requirement to enhance or provide new connectivity to existing community facilities to enhance /create active travel routes. These already exist and will be used by the new residents.

EDUCATION

The contribution that may be required needs to be clarified.

WELSH LANGUAGE

The development is not in a language sensitive area therefore the threshold for the trigger has not been made.

OPEN SPACE

The development is for a small number of houses therefore the threshold for the trigger has not been made.

BIODIVERSITY AND THE NATURAL ENVIRONMENT

This development does not impact on any local, national or internationally important designated site therefore the threshold for the trigger has not be made.

COMMUNITY FACILITIES

As this development is for less than 10 units the threshold for the trigger has not been made.

PUBLIC REALM AND LANSCAPING

Not applicable.

AFFORDABLE HOUSING SUPPLEMENTARY PLANNING GUIDANCE (October 2016)

This is not applicable in the Afan Valley.

OPEN SPACE AND GREEN SPACE SUPPLEMENTARY PLANNING GUIDANCE (July 2017)

As this development is one bed flats the threshold for the trigger for this SPG has not been made.

PARKING STANDARDS SUPPLEMENTARY PLANNING GUIDANCE (October 2016)

The parking standards for this development have been met.

The cycle parking standards has also been met.

DESIGN SUPPLEMENTARY PLANNING GUIDANCE (July 2017)

The Design SPG specifically references Policy SP21 Built Environment and Historic Heritage.

“The built environment and historic heritage will be conserved and enhanced through (3) safeguarding features of historic importance”.

Having closed and vacated, the site has the potential to fall into a state of neglect, particularly in relation to the surrounding land. The development will result in a much more attractive and vibrant development bringing new life back into a somewhat “empty” corner of Cymmer.

This development therefore conforms to the Design SPG.

DETAILED DEVELOPMENT PLAN POLICIES

Policy SC1 – Settlement Limits

This development is within the settlement limit and is proportionate in scale and form to the role and function of Neath Abbey.

Policy I1 – Infrastructure Requirements

Additional funding may be required to consider any impacts of this development which may need to be mitigated for.

Policy H1 – Housing Sites

Windfall Sites contribute an element of the housing provision of the plan. This site contributes to this provision.

Policy EC4 – Protection of Existing Employment Uses

A statement of justification has been prepared to identify why this site needs to be developed for housing.

Policy AH1 – Affordable Housing

Affordable Housing is not a requirement in the Afan Valley.

Policy OS1 – Open Space Provision

As this is a development for 3 and 4 bedroom houses, the contributions needed will be paid towards.

Policy W3 – Waste Management in New Development

The development will be built ensuring that there is minimal waste. The occupation of the site will also ensure that there is minimal waste and maximum recycling with the provision of a recycling area available to all residents.

Policy EN8 – Pollution and Land Stability

Any mitigation needed from a desk top survey of ground contamination will be addressed once known (if any).

Policy TR2 – Design and Access of New Development

This development does not compromise the safe, effective and efficient use of the highway. It also provides appropriate levels of parking and cycling facilities.

Policy BE1 – Design

Development will be expected to take into account the context of the site and its place within the local landscape. Important local features including buildings shall be retained as far as possible.

SUMMARY

This Planning Statement has sought to consider the application in terms of National Policy as well as Local Policy. It is fair to say that since the publication of Future Wales – The National Plan 2040 in February 2021 there has been constant new legislation and guidance. All have a common core in their delivery and that has been the reduction of greenhouse emissions. In delivering this, housing must be better located and connected. Covid-19 has compounded the housing market problems that existed in Neath Port Talbot and this development helps towards addressing one of the major requirements of the LDP and that is housing provision.

The site offers a natural in-filling within the settlement limit and satisfies all of the Policy requirements of the Plan.

Placemaking isn't just a vague statement. Planning Authorities have to consider how it changes its approach from the past and embrace how it shall deliver placemaking in building sustainable development which will be better for future generations.

The Planning Authority need to consider how old, badly repaired businesses that look at crippling running costs into the future need to move forward.

When this business started it had a local market and was appropriate (if not ideal) where it was located. Now with new building regulations, high energy costs, the move to electric vehicles and the need for expensive new equipment and customers requiring less visits to the garage, the Local Planning Authority needs to realise that this situation is likely to be repeated over and over.

This use was always a bad neighbour, and now it has ceased, has the potential to become a dumping ground and an eyesore. There are sufficient precedent cases to guide the decision which will allow good quality housing in a part of the County that desperately needs it following the closure of the secondary school recently. If the high expectations the Local Planning Authority has in the development of the Wildfox Adventure Resort then the LPA has to have confidence in this site also.