



Geraint John Planning

Geraint John Planning
E: geraint@gjplanning.co.uk
T : 02920 105360

Office 16 (House 1, 2nd Floor)
The Maltings
East Tyndall Street
Cardiff
CF24 5EA
www.geraintjohnplanning.co.uk

15 January 2024

Planning Department
Neath Port Talbot County Borough Council
The Quays
Baglan Energy Park
Neath
SA11 2GG

Dear Sir / Madam,

FULL APPLICATION (REF. P2023/0838): THE REGULARISATION OF THE CAR PARK AT THE WELFARE HALL, GLYNNEATH, NEATH, SA11 5EE.

BIODIVERSITY STATEMENT

We have noted an objection from the Council's ecologist on the application ref. P2023/0838. In response to this objection, the following biodiversity statement aims to address the issues and concerns raised:

Landscaping Loss

The Officer has expressed concerns regarding the perceived "loss" of landscaping in this area given what has been approved by permission ref. P2021/0027 (i.e. Condition 11 and the approved landscaping plan) in comparison to what is now proposed (i.e. a car park with associated landscaping). It is important to note however that the original scheme sought to build houses on this land, and as such there would have no biodiversity benefit from this. We appreciate that the proposal could be seen as a perceived loss of landscaping, however when compared to the initial proposal of constructing houses on this plot of land, the proposed development is still enhancing the site's biodiversity benefits, and still introduces a greater diversity of landscape elements. The proposal retains the existing trees, implements landscaping initiatives, and introduces a wildflower meadow adjacent to the car park. These measurements all conserve and enrich the area and landscape. Consequently, the proposal is still seen to enhance the area, and be more biodiversity friendly.

Furthermore, there is strong community support for this area to be retained as a car park with it being heavily relieved upon by the local community - especially by occupiers of the dwellings associated with application ref. P2011/0486, and the users of Glynneath Rugby, Earlsfield play park, tennis courts and library. The community benefits of the car park therefore outweigh any potential adverse biodiversity impacts in this case. Especially as there are no highway safety issues resulting from the proposal, and as the proposal is still enhancing the site's biodiversity benefits and landscaping (as explained above re the original scheme).

Overall, the proposal is still regarded as an overall enhancement to the area in landscaping terms, and on balance, the community benefits are considered to outweigh any perceived landscaping "loss". We

hope this provides a substantial justification for addressing the Officer's concerns about this potential loss.

Proposed Biodiversity Enhancement

In the interest of promoting biodiversity and to provide Ecological Enhancement Measures on site in accordance with Policy 9 of Future Wales, as well as aligning with Policy SP15 of the adopted Neath Port Talbot Local Development Plan, 3 no. external bird nesting boxes will be attached to the existing trees towards the car park's south boundary of the car park.

These bird boxes are specifically designed and sized to accommodate House Sparrows. They will be sited prior to first occupation of the development and will be positioned from a minimum of 2m and a maximum of 4m above ground level.

House Sparrow boxes were specifically chosen for this site's biodiversity enhancement, considering their number in towns and cities have significantly declined by 60% in parts of the UK. Given the substantial population decrease, the House Sparrow is now red-listed as a species of high conservation concern. The proposals therefore seek to enhance this biodiversity aspect.

Green Infrastructure

In light of recent updates to Chapter 6 of Planning Policy Wales Edition 11 in regard to the enhancement of biodiversity and ecosystems, it was suggested any subsequent planning application is supported by a Green Infrastructure Assessment. In this case, the development avoids any damage to biodiversity as it currently operates as an informal car park which would be formalised as a result of the application.

At this stage, it is acknowledged by the Officer that the criteria of a Green Infrastructure Assessment is of a degree of ambiguity and subject to interpretation. As such, the following sets out how the development has considered green infrastructure as part of the proposal:

- In terms of enhancement, the development has incorporated biodiversity enhancement measures, as detailed above, which are proportionate to the development's scale and are designed to be maintenance-free.
- The proposal enables pedestrian access to the adjacent open land and play fields. As a result, the proposal will safeguard natural elements and assists connectivity for pedestrians.
- The site's ecology and visual amenity of the site will be maintained, and the provision of the car park will protect physical health and the wellbeing outcomes of the community.

As such, the proposed development will result an increased net benefit to biodiversity when compared to the initial housing scheme and by maintain the status quo of the site as an informal car park.

It is considered therefore that the proposal is compliant not only with local policy, but also the updated Chapter 6 of PPW 11.

Conclusion

It is considered that the information provided above enables the planning application to be considered and approved.

We trust that the documentation submitted is sufficient. However, should you require further information, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Geraint John', with a stylized flourish at the end.

Geraint John
Director
Geraint John Planning Ltd.