

PLANNING STATEMENT

Gnoll Estate Country Park Car Park Extension and Service Building

February 2024



Summary

Proposal:

Proposed extension of visitor car park, construction of facilities building and associated infrastructure works.

Location:

Gnoll Estate Country Park, Fairyland, Neath, SA11 3BS

Date:

February 2024

Project Reference:

S23.117

Client:

Head of Property and Regeneration for Neath Port Talbot County Borough Council

Product of:

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Introduction

- 1.1 This planning application has been prepared on behalf of The Head of Property and Regeneration at Neath Port Talbot County Borough Council (NPTCBC) for the proposed development comprising the proposed extension of visitor car park, construction of facilities building and associated infrastructure works at Gnoll Estate Country Park, Fair-yland, Neath, SA11 3BS.
- 1.2 This application is one of several applications being made within the Country Park. The wider proposals have been supported by Levelling Up Funding (LUF) from Welsh Government which *"is especially intended to support investment in places where it can make the biggest difference to everyday life, including ex-industrial areas, deprived towns and coastal communities."* It has been introduced to help local areas identify real local priorities for investment. The scheme aims to utilise the LUF to create an attractive environment, heritage and tourism proposition that will benefit the Country Park along with the wider area, making it a highly desirable destination with many economic benefits.
- 1.3 The aim of this Planning Statement is to offer a clear and logical document to outline the planning considerations and planning policies pertinent to the application. The document also acts as a method of representing the details of the planning application in a way that can be read both by professionals and the public.
- 1.4 This Planning Statement acts as a supporting document for the accompanying planning application and should be read in conjunction with all other elements of the application which include the following documents:

Drawing name	Drawing reference
Existing Location Plan – Car Park	2080-05-HIR-A-DR-00020-S2-P4
Main Car Park Improvement Works	2080-05-HIR-A-DR-00210-S2-P2
Existing Location Plan – Service Building	2080-08-HIR-A-DR-00020-S2-P1
Proposed Facilities Building	2080-08-HIR-A-DR-00310-S2-P3
Proposed Location Plan	2080-08-HIR-A-DR-00200-S2-P3
Proposed Site Plan	2080-08-HIR-A-DR-00200-S2-P3

Landscaping Plan	2080-04-DLA-L-DR-3004-S2-T04
Drainage Layout	2080-05-JUB-C-DR-00501-S2-P9
External Works Layout	2080-05-JUB-C-DR-00700-S2-P2
Vehicle Tracking	2080-05-JUB-C-DR-00904-S2-P2
Lighting Plan – Service Building	2080-05-MCP-E-DR-9500-P01
Lighting Plan – Car Park	2080-02-MCP-E-DR-9200-P02

- 1.5 In addition, the following supporting documents have been submitted.

Document name (reference where appropriate)	Prepared by
Planning application forms (1APP)	Asbri Planning
Planning Statement	Asbri Planning
PAC Report	Asbri Planning
Project Context Statement	Hiraeth Architecture
Design and Access Statement (including Heritage Impact Assessment) – Car Park	Hiraeth Architecture
Design and Access Statement (including Heritage Impact Assessment) – Service Building	Hiraeth Architecture
Transport Statement	Asbri Transport
Historic Environment Desk Based Assessment	DAT
Written Scheme of Investigation	DAT
Ecological Assessment	NPTCBC Ecology
Tree Report – Car Park	NPTCBC
Tree Report – Service Yard	NPTCBC
Tree Protection Plan	NPTCBC
Drainage Strategy	Jubb
Non-Mains Drainage Assessment	Jubb
Ground Conditions Assessment Report	Jubb
Coal Mining Risk Assessment	ESP
Soft Landscape Specification	Davies Landscape Architects

Construction Environmental Management Plan	Andrew Scott
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- 1.6 In terms of the content of this Planning Statement, this chapter is followed by a site description and its features which includes a contextual analysis regarding the local character and nearby land uses and review of planning history. Next, Chapter 3 offers an outline of the proposed development. Subsequently, Chapter 4 provides a summary of the relevant national and local planning policies which provide the framework for appraising the proposed development. Meanwhile, Chapter 5 pulls together the vital points and conclusions from the supporting technical documents to demonstrate the overall suitability of the proposal in planning terms. To conclude, Chapter 6 states why the proposal should be granted planning permission.

Site Description and Context

General Location

- 2.1 The application site comprises the Gnoll Estate Country Park in Neath. The country park is a grade II* registered historic park and garden which sits on a steep sided hill at the eastern end of Neath. The park has retained its rich history by telling the story of the Mackworth family through the existing features still situated within the park that include four large duck ponds, two 18th century cascades and the Gnoll House ruins.
- 2.2 Figure 1 below demonstrates the Country Park's location (identified by red circle) within the wider surrounding area. A site location plan has been produced for each application, showing both a red line plan and blue line showing the land which is in the applicant's ownership.

Figure 1: Site Location (Source: OS Map online)



Site Features

- 2.3 The site itself is circa 5 hectares, and contains a visitor centre with café and toilet facilities inside, a children's playground, a fishpond, formal cascades and bridge, and waterfall and stream. There are several footpaths lying within the site which are used by visitors, and there are also three Grade II listed buildings within the site boundary:
- The Mosshouse Wood Cascades;
 - The Grotto; and
 - The War Memorial.

- 2.4 The site's immediate surroundings to the north, south and west are mostly residential, whereas east lie several fields of grassland and trees. To the west of the site lies Neath town centre, where there are a range of facilities and services:
- Gnoll Country Park;
 - Neath Leisure Centre,
 - Neath Train Station;
 - Gwyn Hall;
 - Supermarkets;
 - Public House;
 - Pharmacy;
 - Dentist; and
 - Victoria Gardens
- 2.5 The entire application site lies within Zone A in the Natural Resources Wales (NRW) Development Advice Map. The Flood Map for Planning places some parts of the site within Flood Zones 2 and 3 for surface water and small watercourses.
- 2.6 A review of Cadw's shows there are three grade II listed buildings within the site curtilage as outlined in Paragraph 2.3. As previously noted, the Country Park is a Grade II* listed designated parkland, with it registered due to the survival of its largely eighteenth-century landscape park, which has significant historic interest, in its original rural setting above the town of Neath.
- 2.7 The Coal Authority's Interactive Map reveals some of the land to the west of the fishpond is within a Coal Mining Development High Risk Area.
- 2.8 Within the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) Proposals Map, the following policies are applicable to the site:
- Policy SP5 – Coastal Corridor Strategy Area;
 - Policy EN3 – Green Wedge;
 - Policy SP21 – Built Environment and Historic Heritage;
 - Policy M1 – Development in Mineral Safeguarding Area; and
 - Policy M2 – Surface Coal Operations

Individual Application Site

- 2.9 Application 6 – Car Park Extension and Service Building
- The existing car park is positioned to the north of the existing Gnoll Park Visitor Centre. It currently contains 183 vehicle spaces in total, and is served by vehicular access along Fairyland. The proposed areas for informally extending the car park are relatively flat, green open spaces that lie adjacent to the existing car park.

- 2.10 The proposed location of the new facilities building is to the east of the new visitor centre and in close proximity to the main visitor car park. The site currently consists of wooded land which is screened by trees.

Access

- 2.11 The site is less than two miles away from the Heads of the Valleys Road (A465), a trunk road that runs from Junction 43 of the M4 at Llandarcy to Bromyard in Herefordshire. It is 66 miles in total and connects settlements including Neath, Abergavenny, Merthyr Tydfil and Hereford. Junction 43 of the M4 is only a 10 minute drive away, which offers access to several destinations within South Wales and across the border in England.
- 2.12 The site is positioned in a highly sustainable location, with several bus stops in close proximity to the site. The nearest bus stop lies just before the main entry to the site along Fairyland. This stop is serviced by the 153 on a two hour basis, terminating at Neath bus station. Neath bus station is in the town centre, and has services heading to several destinations including Swansea, Skewen, Margam, Pontardawe and Brecon.
- 2.13 Neath Train Station is less than ten minutes away from the application site. Hourly services are operated by Great Western Railway travel between Swansea and London Paddington in both directions. Transport for Wales services also call at the station, with their services terminating at destinations including Manchester Piccadilly, Cardiff Central, Carmarthen and Milford Haven.
- 2.14 Running to the north of the site is national cycle route 47 which goes from Newport to Fishguard and forms part of the Celtic Trail West. The route itself is 121 miles long and over half of it lies in traffic free paths.

Planning History

- 2.15 A review of Neath Port Talbot's online planning history identifies the following planning history of importance relating to the site which dates back to 1993.

LPA Reference	Proposal	Decision
N1993/0394	De-siting first, fish and guinea ponds, and watercourse. New road and car park, visitor centre, playground, golf course	Approved 25/10/2023

N1993/0416	Visitor Centre for information and leisure purposes	Approved 25/10/2023
N1993/0535	Visitor Centre	Approved 06/12/1993
N1993/0537	General refurbishments including new access steps	Approved 20/12/1993
N1994/0012	Removal of condition 4 and 5 application no. 93/394 and construction of footpath from Fairyland to car park	Approved 07/03/1994
N1994/0436	Modification to car parking area adjacent to first pond as approved on 2/3/93/0394/11	Approved 19/09/1994
P1997/0491	Renovations and improvements to Pond Cottage	Permitted Development 13/06/1997
P2014/0598	Prior notification for demolition of classroom building.	Prior Notification Approval Not Required 18/07/2014
P2017/0312	Extension to existing children`s playground	Approved 20/06/2017
P2022/1055	Installation of 8m high multi play tower/equipment (to replace existing play apparatus/thick climbing unit)	Approved 01/02/2023
P2023/0659	Demolition of existing visitor centre and construction of new 2 storey visitor centre including new balustrades, sprinkler tank, external lighting of pedestrian routes from existing car park and associated landscaping and drainage works	Pending
P2023/0676	Proposed single storey rear extension and change of use of Pond Cottage to form a tea room/cafe (A3 use)	Pending
P2023/0732	Consolidation and repair works to Gnoll House ruins and creation of education interpretation centre in Gnoll House cellars	Pending
P2023/0789	Creation of new visitor accommodation comprising the reinstatement and landscaping of former kitchen gardens, reconstruction of former potting sheds to provide a new office/reception and 2 no. self-catering holiday units, construction of 14 no. new holiday cabins, a welfare/laundry building, replacement	Pending

	<i>workshop/machinery store and new parking area within pumphouse service yard</i>	
<i>P2024/0014</i>	<i>Temporary modular cafe and toilets facility with enclosed external seating area (for a maximum of 12 months)</i>	<i>Withdrawn 12th February 2024</i>

Proposal

- 3.1 The proposal seeks full planning permission for the extension of visitor car park, construction of facilities building and associated infrastructure works at Gnoll Estate Country Park.
- 3.2 The proposal itself consists of the following:
- Extension to existing car park by creating two areas of additional parking that will accommodate 100 new spaces;
 - Provision of 12 electric vehicle charging points;
 - Provision of 15 no. cycle stands;
 - Erection of a purpose-built service building; and
 - Associated landscaping and infrastructure works.

Further details over the precise nature of the proposals can be found in the accompanying Design and Access Statements (including Heritage Impact Assessments) produced by Hiraeth Architecture.

- 3.3 The car park extension aims to offer additional spaces to facilitate the anticipated possible increase in visitor numbers whilst taking into consideration the character and appearance of the Park in order to minimise impact. 12 electric vehicle charging points will be provided and will be located within some of the existing parking bays by the visitor centre.
- 3.4 In terms of the facilities building, it is proposed that a new functional building in a central location within the Park is provided. At present, the facilities building is situated to the south of the fishpond however in order to facilitate the Kitchen Garden development (Currently submitted under planning reference P2023/0789), it needs to be relocated. Furthermore, the current facilities offer a lack of storage space, and containers are also being utilised which don't serve their intended purpose. The new facilities building will house the following: horse box, flail deck mower, mini compact tractor, gator and an all-terrain vehicle.
- 3.5 This application is one of several applications being made within the Country Park. The wider proposals have been supported by Levelling Up Funding (LUF) from Welsh Government which "is especially intended to support investment in places where it can make the biggest difference to everyday life, including ex-industrial areas, deprived towns and coastal communities." It has been introduced to help local areas identify real local priorities for investment. The scheme aims to utilise the LUF to create an attractive environment, heritage and tourism proposition that will benefit the Country Park

along with the wider area, making it a highly desirable destination with many economic benefits.

Design

- 3.6 This section addresses the five objectives of good design which include access, character, environmental sustainability, movement and community safety. This is expanded upon further in the Design and Access Statement produced by Hiraeth Architecture.

Access

- 3.7 100 new parking spaces are to be provided to the northwest and northeast of the existing loop road to the car park offering vehicular access to these areas without requiring the construction of new extensive access roads. The new facilities building will require an access route, this will lead from the car park and enable it to be accessed by both vehicles and pedestrians, though this will be restricted by a gate upon site entry. Existing paths within the landscaping of the Park will offer a route to the proposed entrance.

Character

- 3.8 In terms of the additional car parking, careful consideration has been given to the existing Parkland to ensure this area is not overdeveloped or includes too much hard surfacing. The design aims to be sympathetic and native hedgerow planting is proposed in addition to the retention of existing trees in order to offer an element of screening. The use of dark green metal sheeting for the new facilities building will enable it to blend in with its surrounding and prevent it from being visually obtrusive.

Environmental Sustainability

- 3.9 The scheme aims to address sustainability matters by installing 12 electric vehicle charging points within the car park, along with providing 15 new cycle stands. The electric chargers are to be provided within the existing visitor spaces that lie in close proximity to the visitor centre. The new cycle stands will encourage users to travel to the Park in a sustainable manner, and they will be able to leave their bicycles in a safe and secure area. These measures will further enhance the sustainability credentials of the Park moving forward.

Movement

- 3.10 A key aspect of any development is for the site to be accessed by numerous types of transport. Throughout this document, it has been emphasised that the site is well situated for public transport and active travel needs which permit access to nearby facilities and settlements, and wider areas of NPTCBC. The site is positioned in a

sustainable location, with several bus stops in close proximity to the site. The nearest bus stop lies just before the main entry to the site along Fairyland whereas Neath Train Station is less than a ten minute drive from the application site. Running to the north of the site is national cycle route 47 which goes from Newport to Fishguard and forms part of the Celtic Trail West.

- 3.11 Connectivity between the vehicle charging areas and new visitor centre has been enhanced. An accessible path is proposed, in addition to levels being adjusted to suit a raised walkway into the new visitor centre.

Community Safety

- 3.12 Natural surveillance of the car park is already in place due to the number of visitors to the Park on a daily basis. Community safety will be improved through re-location of the new service building with a gated area installed to restrict unauthorised access. Storing the equipment within a secure building is key for the safety of staff, volunteers and visitors. The Lighting Schemes produced by McCann and Partners will also improve safety and visibility in these areas of the Park.

Pre-Application Consultation

- 3.13 Hiraeth Architects and NPTCBC undertook a public consultation event at Gnoll Estate Country Park Visitor Centre, which displayed all information included in the Stage 1 Levelling Up Funding document. A formal pre-application consultation took place between 18th May 2023 and June 15th 2023, with site notices displayed on site, letters sent to statutory, other and community consultees, along with adjoining residents. In addition to this, a response desk was set up in the visitor centre. Further information concerning the pre-application process and the responses gathered can be found in the submitted PAC Report.

Planning Policy Context

Introduction

- 4.1 The planning policy framework for the determination of this application is provided by the content and scope of national planning guidance, together with the adopted Neath Port Talbot County Borough Council Local Development Plan. National Planning Policy is largely contained within Planning Policy Wales (PPW) – 11th Edition, published by the Welsh Assembly Government on February 2021. PPW is supplemented by 19 Technical Advice Notes (TANs), the relevant TANs will also be discussed within this chapter.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
 - Neath Port Talbot County Borough Council Local Development Plan (January, 2016)
- 4.3 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:
- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
 - Neath Port Talbot County Borough Council Supplementary Planning Guidance; and
 - Managing Change to Registered Historic Parks and Gardens in Wales (Cadw Guidance published in 2017)

National Level

The Well-Being of Future Generations (Wales) Act 2015

- 4.4 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires *“public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”*. The Act sets out seven ‘well-being’ goals as follows:
- A prosperous Wales: 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); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the

wealth generated through securing decent work.

- A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global wellbeing.

- 4.5 Within the Act, sustainable development is defined as follows: *"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"*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

National Development Framework: Future Wales – The National Plan 2040

- 4.6 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. 'Future Wales' sets out the Welsh Government's strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.

- 4.7 Future Wales sets out its overarching ambitions based on the na-

tional planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes.

As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time, as follows:

A Wales where people live:

- 1. ...and work in connected, inclusive and healthy places*
- 2. ...in vibrant rural places with access to homes, jobs and services*
- 3. ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth*
- 4. ...in places with a thriving Welsh Language*
- 5. ...and work in towns and cities which are a focus and springboard for sustainable growth*
- 6. ...in places where prosperity, innovation and culture are promoted*
- 7. ...in places where travel is sustainable*
- 8. ...in places with world-class digital infrastructure*
- 9. ...in places that sustainably manage their natural resources and reduce pollution*
- 10. ...in places with biodiverse, resilient and connected ecosystems*
- 11. ...in places which are decarbonised and climate-resilient*

- 4.8 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

Policy 1 – Where Wales will Grow

The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- *Cardiff, Newport and the Valleys*
- *Swansea Bay and Llanelli*
- *Wrexham and Deeside*

- 4.9 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires "an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable" (page 76).

- 4.10 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

Policy 9 – Resilient Ecological Networks and Green Infrastructure

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation,*
- *to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.*

4.11 Future Wales identifies that transport in Wales is currently dominated by the car and that *"our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people's everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people's health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation"* (page 85).

4.12 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *"to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel"* (page 85).

4.13 Policy 28 (National Growth Areas - Swansea Bay and Llanelli) of Future Wales is also of relevance, as it states that Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. This national growth area is considered as the hub for economic and housing growth.

Planning Policy Wales (Edition 12)

4.14 Planning Policy Wales (PPW) sets out land use planning policies of the Welsh Government which is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

4.15 Its primary objective 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.

- 4.16 Sustainable Development is defined at Page 7 of PPW as follows: *"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"*.
- 4.17 Paragraph 1.18 sets out that *"Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated"*.
- 4.18 The significance of good design for development proposals is highlighted in Paragraph 3.3 of PPW where it is noted *"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"*.
- 4.19 Design is not only about the architecture of a structure but the relationship amongst every facet of the natural and built environment and between people and places. Furthermore, good design encourages environmental sustainability and contributes towards meeting well-being targets. Paragraph 3.7 states: *"Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution. An integrated and flexible approach to design, including early decisions regarding location"*.
- 4.20 Paragraph 3.8 discusses good design within an environmental context. It *"can help to ensure high environmental quality. Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places. This embraces the principles of 'ecosystems services' and sustainable management of natural resources where multiple benefits solution become an integral part of good design. In a similar manner,*

addressing environmental risks can make a positive contribution to environmental protection and improvement, addressing land contamination, instability and flood risk and providing for biodiversity, climate protection, improved air quality, soundscape and water resources benefits".

- 4.21 Paragraph 3.9 focuses on how the special characteristics of an area should be fundamental for development design: *"The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process and expressed, when appropriate, in a design and access statement"*.
- 4.22 Paragraph 3.75 states *"The construction of new buildings in a Green Belt or green wedge is inappropriate development unless it is for the following purposes:*
- justified rural enterprise needs;*
 - essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the Green Belt or green wedge and which do not conflict with the purpose of including land within it;*
 - limited extension, alteration or replacement of existing dwellings; or*
 - small scale diversification within farm complexes where this is run as part of the farm business."*
- 4.23 Paragraph 4.1.10 highlights that any development should focus on sustainable travel and reduce the reliance on cars, with a particular emphasis on short journeys as these are most frequently made by individuals. *"The planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:*
- are sited in the right locations where they can be easily accessed by sustainable modes of travel and without the need for a car;*
 - are designed in a way which integrates them with existing land uses and neighbourhoods; and*
 - make it possible for all short journeys within and beyond the development to be easily made by walking and cycling."*
- 4.24 Paragraph 4.1.11 supports the above information, by encouraging development of active travel and sustainable transport infrastructure and services. It notes that *"proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising*

the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services."

4.25 Paragraph 5.5.1 notes *"Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection."*

4.26 Paragraph 6.1.2 states *"The historic environment is made up of individual historic features which are collectively known as historic assets. Examples of what can constitute an historic asset include:*

- Listed buildings;*
- Conservation areas;*
- Historic assets of special local interest;*
- Historic parks and gardens;*
- Townscapes;*
- Historic Landscapes;*
- World Heritage Sites; and*
- Archaeological remains (including scheduled monuments)."*

4.27 In respect of Historic Park and Gardens, PPW states *"Planning authorities should value, protect, conserve and enhance the special interest of parks and gardens and their settings included on the register of historic parks and gardens in Wales. The register should be taken into account in planning authority decision making. Green Infrastructure Assessments should be used to explore the role of historic parks and gardens and the findings of other landscape character assessments should be fed into historical and cultural assessments to ensure consistency of information."*

4.28 Paragraph 6.1.19 states *"The effect of a proposed development on a registered park or garden, or its setting, is a material consideration in the determination of planning applications".*

Technical Advice Notes

4.30 The following Technical Advice Notes (TANS) are of relevance to the development proposal.

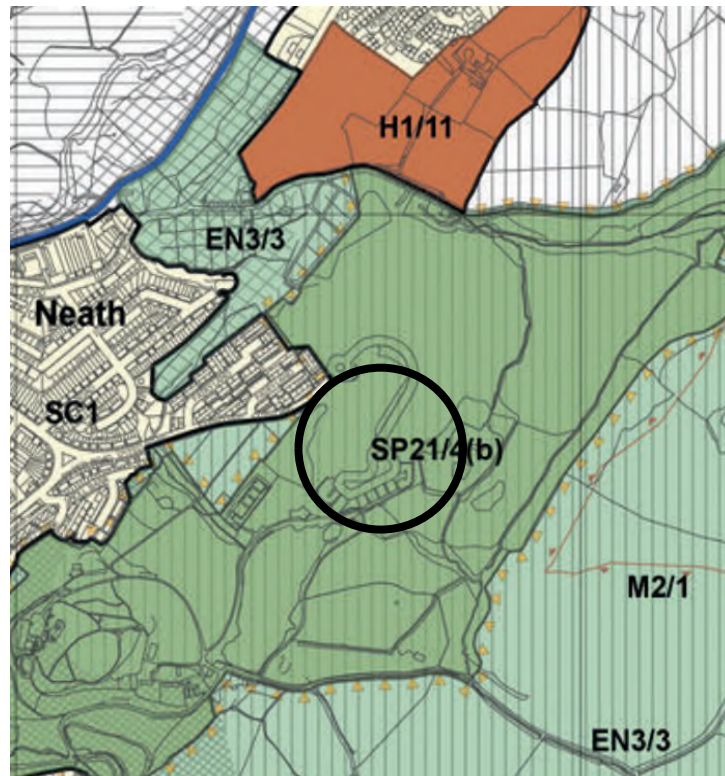
- Technical Advice Note 12: Design;
- Technical Advice Note 13: Tourism;
- Technical Advice Note 18: Transport; and
- Technical Advice Note 24: The Historic Environment

Local Level

Neath Port Talbot County Borough Council Local Development Plan

- 4.31 The Neath Port Talbot County Borough Council Local Development Plan (LDP) was adopted in January 2016 and is the prevailing development plan for the County. The application site lies outside the settlement boundary relating to Tonna as shown below in Figure 3. From the map, the following LDP policies are applicable to the site:
- M1 - Development in Mineral Safeguarding Areas
 - EN3/3 - Neath / Tonna / Cimla / Efail Fach Green Wedge
 - SP5 - Coastal Corridor Strategy Area
 - SP21/4(b) - Built Environment and Historic Heritage (Historic Parks and Gardens)
 - M2/1 - Surface Coal Operations

Figure 3: NPTCBC LDP Map



- 4.32 The following LDP policies are considered relevant in the context of the proposed development:

Policy Reference	Relating To...
Policy SP1	Climate Change
Policy SP2	Health
Policy SP3	Sustainable Communities

Policy SC1	Settlement Limits
Policy SP4	Infrastructure
Policy I1	Infrastructure Requirements
Policy SP5	Development in the Coastal Corridor Strategy Area
Policy SP13	Tourism
Policy TO1	Tourism Development in the Countryside
Policy EN3	Green Wedges
Policy SP15	Biodiversity and Geodiversity
Policy EN7	Important Natural Features
Policy M1	Development in Mineral Safeguarding Areas
Policy M2	Surface Coal Operations
Policy RE2	Renewable and Low Carbon Energy in New Development
Policy SP20	Transport Network
Policy TR2	Design and Access of New Development
Policy SP21	Built Environment and Historic Heritage
Policy BE1	Design

Supplementary Planning Guidance

4.33 The following Supplementary Planning Guidance are considered relevant to the proposal:

- Infrastructure Requirements
- Biodiversity and Geodiversity
- Parking Standards
- Design
- The Historic Environment

Cadw Guidance – Managing Change to Registered Historic Parks and Gardens in Wales

4.34 Cadw produced the above best-practice guidance in order to provide general advice when changes are proposed to impact upon a registered historic Park and Garden. Under Section 2.2 it states that *"it is important to consider the impact of your proposals for change on the significance of your registered historic park or garden before you begin work. In particular, you should beware of the potential cumulative impact of small-scale changes, which individually may seem insignificant."*

4.35 Within the document, the following advice is provided:

- Setting - *When considering change, you should take a holistic approach to understanding its potential impact on setting. The impact of change on any one element may have unintended consequences for the setting if it is not properly considered.*

- Views - *Over time, views can be lost or compromised. This may result from inappropriate planting, incongruous development, or from lack of maintenance which has allowed vegetation to grow and obscure the intended view. Once you have identified the contribution of views to the significance of your registered historic park or garden, you may be able to open up and manage intended views which will enhance the site's historic character and heritage value, as well as your appreciation of it.*
- Archaeology - *Significant archaeological features may be present in a historic park and garden; they may be undesignated or as yet undiscovered. When considering change that may impact on archaeological features you should contact your local planning authority's archaeological advisors for advice.*
- Layout - *It is important that you understand the significant elements of the historic layout of your registered historic park or garden and interpret their evolution. This will help you to make informed and sympathetic management decisions without compromising its historic significance.*
- Entrances and Routes - *Wherever possible, you should keep historic circulation routes open. Information in the register entry and historic map research can help you to understand which routes are significant. If possible, you should avoid creating additional routes which subdivide parkland or alter the historic layout. If a new route is unavoidable or highly desirable, you should give it careful consideration to ensure minimal adverse impact on your registered historic park or garden. If additional routes are required, consider opportunities to open up former historic drives and tracks through the site.*
- Historic Boundary Features - *You should retain historic boundary features where possible and your repairs should use traditional materials and methods. Where possible, avoid additional permanent boundaries in open parkland because they fragment the landscape physically and visually, and alter the historic layout. It is also important to consider the function of the boundary.*
- Garden Building and Ornaments - *Built structures are often vulnerable to damage, decay and neglect. Routine management and maintenance are important to ensure longevity. Your repairs should use sympathetic materials and techniques. They need to be informed by an understanding of the historic structure and its condition. It is advisable to seek advice from an appropriately qualified and experienced professional before repairing historic structures.*

- *Water Features - Like other historic features in your registered historic park or garden, it is essential to understand the significance of water features and associated water management structures before making changes to them.*
- *Planting - Registration does not place any restrictions on planting layout and choice of plants; however, understanding the significance of the planting in your registered historic park or garden can help you to manage it and enhance historic character.*

Appraisal

Overview

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the statement aims to identify the main issues of relevance to the determination of the planning application, and assess the scheme against the Development Plan.
- 5.2 The key material considerations of relevance in the determination of the application are as follows:
- Principle of Development;
 - Impact on Visual Amenity;
 - Access and Highway Considerations; and,
 - Other Material Considerations.

Principle of Development

- 5.3 The proposal consists of the extension of visitor car park, construction of facilities building and associated infrastructure works within Gnoll Country Park. Within the LDP, the site lies outside settlement limit, but is within a designated heritage Park, as recognised under Policy SP21.
- 5.4 In considering the principle of development, the key LDP policies are policies EN3 (Green Wedges), SP21 (Built Environment and Historic Heritage), SP13 (Tourism), TO1 (Tourism Development in the Countryside), SP20 (Transport Network), TR2 (Design and Access of New Development) and BE1 (Design).
- 5.5 The application site consists of part of the existing car park that is near the visitor centre, in addition to two areas for the car park extension that are relatively flat. The proposed facilities building lies east of the visitor centre and currently comprises of woodland.
- 5.6 Neath Port Talbot County Borough Council has submitted a successful funding application to the UK Government's Levelling Up Fund to deliver £12 million of investment over the next two years at Gnoll Estate Country Park. The overarching focus of the Gnoll Estate Country Park project is to improve facilities, enable the restoration of the various heritage assets and enhance the natural environment within the Park in order to boost tourism prospects across the Park. Consequently, tourism policies SP13 (Tourism) and TO1 (Tourism Development in the Countryside) are pertinent to this application.

- 5.7 Policy TO1 states: *Tourism proposals outside of settlement limits will only be permitted where all of the following criteria are satisfied:*
- 1. It is demonstrated that the proposal is viable and contributes towards the quality and economic sustainability of the tourism industry;*
 - 2. It is demonstrated that either the proposal requires a countryside location or it could not be accommodated within an existing settlement;*
 - 3. The proposal would not have an adverse impact upon the landscape, ecology, and cultural heritage and would not adversely impact upon the social, economic, environmental or residential amenity of the area;*
 - 4. The proposal does not create unacceptable levels of vehicular traffic, cause a detriment to highway safety and access can be provided by a range of transport modes.*

An assessment of the proposals against these criteria is offered below:

1. It is demonstrated that the proposal is viable and contributes towards the quality and economic sustainability of the tourism industry

Extending the car park will boost the tourism prospects of the Park by encouraging visitors to visit as they will know ample parking is provided. These additional 100 spaces are necessary to accommodate the proposed changes at the Park (Please refer to all submitted applications to date) that aim to boost the facilities and services provided within the Park. The brand-new facilities building will house modern equipment that will enable staff and volunteers to preserve the quality of the Park facilities.

2. It is demonstrated that either the proposal requires a countryside location or it could not be accommodated within an existing settlement

The proposal is intrinsically linked to the Country Park and as such the development location is dictated by this factor. The scale and location of the development is appropriate and due to the site's green wedge allocation, it is not possible for the proposal to be situated within an existing settlement unless it would be situated outside the grounds of the Park.

3. The proposal would not have an adverse impact upon the landscape, ecology, and cultural heritage and would not adversely impact upon the social, economic, environmental or residential amenity of the area

Under subsequent headings, it is confirmed that there will be no impact upon ecology, landscape or cultural heritage. Furthermore, there will be no negative social, economic or environmental impact.

4. The proposal does not create unacceptable levels of vehicular traffic, cause a detriment to highway safety and access can be provided by a range of transport modes.

The proposal will see an increase in vehicle movements associated with the site. In order to accommodate the increase in visitor numbers, an additional 100 parking spaces are to be provided, which will

take the number of parking spaces at the main car park to 283 spaces. As noted previously in this document, a bus stop is situated on entry to the Country Park which offers services to Neath town centre, whereas running to the north of the site is national cycle route 47 which affords access by a range of transport modes. The proposal supports users of electric vehicles with 12 brand new electrical charging points required, and 15 new cycle stands are proposed that will encourage visitors and tourists to cycle into the site.

- 5.8 Policy SP21 (Built Environment and Historic Heritage) is *"encouraging high quality design standards in all development proposals*. The impact of the car park extension upon the Park was heavily scrutinised through the design process, with several locations proposed including making use of the golf course. It has been decided to pursue the submitted option as it reduced the need to expand into surrounding areas, forming a natural extension to the existing parking provision. The facilities building has been designed to blend in with its surroundings in order to have minimal impact upon the Registered Park and Garden. A dark green metal sheeting will be used to clad the building that will assist with this. Within Policy SP21, the application site is identified as a Historic Park and Garden, one of six within the Local Authority.
- 5.9 In terms of Policy EN3 (Green Wedges), the site is located within the Neath/Tonna/Cimla/Efail Fach green wedge. The proposal is not supportive of inappropriate development, however given the fact that an extension to the existing car park and new facilities building is necessary, this will boost the wider tourism prospects of the Park. The policy states that proposals in a green wedge are unacceptable *"other than those for certain justified or essential activities that need to be located in the area and small scale extensions"*. The car park extension will prevent any unauthorised parking that will block access/exit routes and parking in public open space, whereas a new service building is required to house all necessary equipment that will assist with keeping the Park in pristine condition. To summarise, it is considered that the proposed works would not in any way prejudice the openness of the green wedge, therefore the proposal accords with the spirit of Policy EN3 (Green Wedges).
- 5.10 Policy BE1 (Design) advocates high quality design of proposals that take into consideration the existing environment to create beautiful places and spaces. This policy recognises the importance of the proposed development fitting in with the current character of the site, whilst considering its impact on the surrounding areas. Moreover, the design should factor in accessibility for all users, create an attractive safe place for visitors and use materials that match the characteristics of the site.

- 5.11 It can be confirmed that the proposal aligns with Policy BE1 (Design), with all the following measures proposed as part of the development:
- It complements the character and appearance of the site;
 - The design of the scheme takes into consideration the existing context;
 - Materials will be used that are appropriate to its surroundings
 - There will be no detrimental impact on highway safety;
 - Ecological enhancements are proposed as part of this application;
 - Natural surveillance is encouraged
- 5.12 In respect of Policy SP20 (Transport Network), the proposal offers appropriate parking provision through the extension to meet the increased number of visitors attending the Country Park. The increase in trip generation will have minimal highway impact, and therefore there are no detrimental transport issues caused by the extension. Consequently, the development accords with this policy. In terms of Policy TR2 (Design and Access of New Development), an assessment has been provided below:
- 1. 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 or create unacceptable levels of traffic generation;**
- As noted in the Transport Statement, there won't be an unacceptable impact on the existing highway network. Due to the increased number of visitors to the Country Park. There won't be any unacceptable levels of traffic generation created, and the increase in visitor numbers will be managed through the creation of 100 new visitor parking spaces.
- 2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;**
- In order to meet visitor demand, a further 100 vehicle spaces have been provided. This visitor parking increase is considered appropriate in order to manage the increase in visitor numbers due to the proposed improved tourism offering.
- 3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;**
- The development is accessible by several modes of transport which has been emphasised throughout this Planning Statement.
- 4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation**
- A Transport Statement has been produced by Asbri Transport that addresses all highway and transport matters. The Local Highway Au-

thority commented during the Pre-Application Consultation process that a Transport Statement would be sufficient for this proposal.

Impact on Visual Amenity

- 5.13 The proposed development has been designed to have minimal impact upon the wider visual amenity of the Park. The car park will be extended to the northwest and northeast of the existing loop road running through the Country Park. The zones of development are appropriate as they prevent encroaching upon the wider landscape. To reduce visual impact, native hedgerows are proposed in addition to the retention of existing trees. As previously mentioned, the facilities building will blend in with the existing surroundings in order to have no visual impact. This use of a dark green cladding for the building will assist this process, and the proposed building will be surrounded by several trees. The proposal complies with Policy BE1 (Design) as careful consideration has been given to the *"siting, design, appearance, massing and scale to minimise any visual intrusion and where appropriate enhance the visual aspects of the area"*.

Highways and Access Considerations

- 5.14 For the visitor car park, 100 additional spaces are proposed which can be adequately accommodated within the application. Furthermore, 12 electric vehicle charging points will be provided in the existing car park area nearest the visitor centre. 15 cycle stands are to be provided near the existing car park. This figure meets the total number of cycle stands required as part of all planning application submitted to date for the series of proposed developments at Gnoll Park.
- 5.15 As previously mentioned, the site lies in a sustainable location that can be accessed via bus. The nearest bus stop lies just before the main entry to the site along Fairyland. This stop is serviced by the 153 on a two hour basis, terminating at Neath bus station. Neath Train Station is less than a ten minute drive from the application site and receives a frequent service from both Transport for Wales and Great Western Railway. Running to the north of the site is national cycle route 47 which goes from Newport to Fishguard and forms part of the Celtic Trail West. A Transport Statement accompanies this application which concludes, the impact of the forecast increase in trip generation that may be expected as a consequence of the development on the access and local highways network are minimal, with no reasons for refusal on transport and highways grounds. As a result of the above, the proposal is considered to align with Policies SP1 (Climate Change), SP20 (Transport Network), TR2 (Design and Access of New Development) and BE1 (Design).

Other Material Considerations

Trees

- 5.16 The submitted tree reports state that there are a total of 13 trees within the application site (1 Category A, 8 Category B, 3 Category C and 1 Category U). Of these trees, only the one Category U tree requires removal. The root protection area of tree group G1 within the facilities building report will need to be offset in order to minimise tree removal.
- 5.17 In terms of recommendations within the report, protective fencing needs to be erected around the root protection zones prior to any work on site. The report advises that the trees should be inspected for any protected species, and that any form of hard surfacing construction within root protection zones is ill-advised. Should all recommendations be carried out from the report, the development is not deemed to have any negative effect on the vast majority of retained trees. From a policy perspective, LDP Policy EN7 (Important Natural Features) is pertinent to this material consideration. In summary, the development will not impact any trees of high or medium value, with only one Category U tree requiring felling. Having considered the above, the proposal is compliant with Policy EN7.

Ecology

- 5.18 The car park extension areas are situated within species poor amenity grassland areas. As mentioned above, one tree requires removal to facilitate this aspect of the development. To enable biodiversity enhancement, 2 lines of native hedgerow are to be planted adjacent to the car park extension zones. In order to facilitate the development of the new service building, roughly 700m² of scrub woodland will be cleared. The Ecological Assessment states that there are no ecological constraints connected with the scrub clearance to allow the facilities building construction. To mitigate for the loss of scrub woodland, the adjacent scrub woodland will be entered into a woodland management plan. At present, the area to be managed has not been confirmed although it will be at least 3 times greater than the size of the area to be cleared.
- 5.19 As no further survey work is necessary and a set of ecological enhancements have been proposed, the scheme is compliant with Policies SP15 (Biodiversity and Geodiversity) and EN7 (Important Natural Features). The proposal will protect, conserve, enhance and manage *"Important habitats, species"* as noted in Policy SP15, whereas the development won't *"adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds"* which is requested as part of Policy EN7. Measures have been put in place to protect existing trees, with only a Category U tree needing felling. Furthermore, biodiversity enhancements have been put forward to mitigate any impact of the development and biodiversity interests.

Landscaping

- 5.20 The Landscaping Plan (Drawing Ref: 2080-04-DLA-L-DR-3004-S2-T04) shows 2 lines of native hedgerow are to be planted adjacent to the car park extension zones in an attempt to integrate the proposal into the wider surroundings. Re-graded soil will be provided to surround the extended car park areas which are to seeded with amenity grass seed. The full planting schedule is available within the aforementioned drawing, and further detail is provided within the Soft Landscape Specification produced by Davies Landscape Architects. In summary, the landscaping additions preserve and enhance biodiversity and enable the scheme to pursue biodiversity net gain.
- 5.21 In terms of Policy BE1 (Design), the proposal adheres to the following point *"4. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate"*. Introducing landscaping into the development will enhance the scheme and allow it to integrate into its immediate surroundings. The proposal acknowledges that *"Landscaping has an important effect and is a significant part of the overall design process"*.

Drainage

- 5.22 SAB will be required as part of the application, as the extension area of the car park is greater than 100m². Surface water runoff is proposed to discharge via infiltration at the car park. Geotechnical soak away tests suggested good infiltration rates there. As shown on the Drainage Layout (2080-05-JUB-C-DR-00501-S2-P9), infiltration will take place at the base of permeable paving within both car park extension zones. Foul water drainage is not required in this area as stated in the Non-Mains Drainage Assessment.
- 5.23 Having considered the above, the proposal aligns with the following point of Policy BE1 (Design): *"9. Its drainage systems are designed to limit surface water run-of and flood risk and prevent pollution"*.

Archaeology

- 5.24 A Written Scheme of Investigation and Historic Environment Desk Based Assessment (DBA) has been produced by Dyfed Archaeological Trust to accompany the proposed set of works at Gnoll Park. The DBA summarises that there is no impact on the locations of the proposed service building and car park extension.
- 5.25 In terms of mitigation, as there is no impact identified in respect of both application, additional archaeological mitigation is not required.

From a policy perspective, the proposal accords with Policy SP21 (Built Environment and Historic Heritage) by safeguarding the existing historic significance of the site.

Ground Investigation and Coal Mining Risk

- 5.26 The Coal Mining Risk Assessment produced by Earth Science Partnership revealed there were no recorded mine entries or mine workings within the vicinity of the application site. There are three relatively thin seams, which means the risk on mine workings within the seams could be low. The report states that due to the lack of correct information, this should be investigated in further detail.
- 5.27 In terms of further investigative work, the report advises the following:
- Three boreholes to 30m required due to mining hazard below site;
 - Assessment of subsidence risk to development and options considered for risk mitigation measures
 - Mine Gas Risk Assessment may also be required.
- 5.28 Following the results of the Coal Mining Risk Assessment, Jubb produced a Ground Conditions Assessment Report which revealed:
- A thin veneer of topsoil extending to a depth of 0.3 metres was encountered within the grassed areas of the car park;
 - No sources of gas were identified therefore risk is deemed to be negligible;
 - Overall contamination risk is considered to be low;
 - No coal mining risk associated with the site; and
 - No further survey work required
- 5.29 Having considered the above, the proposal accords with LDP Policy M1 (Development in Mineral Safeguarding Areas). In respect of Policy M1, it has been evidenced throughout this document that there is a need to extend the existing car park and provide a new service building for the Park, and further justification for this can be seen in the Design and Access Statement.

Conclusion

- 6.1 This planning statement has been prepared on behalf of The Head of Property and Regeneration at Neath Port Talbot County Borough Council (NPTCBC) for the proposed extension of visitor car park, construction of facilities building and associated infrastructure works, at Gnoll Estate Country Park, Fairyland, Neath, SA11 3BS. This application forms part of a series of works proposed at Gnoll Park as part of a Levelling Up Funding programme.
- 6.2 The application site encompasses some of the existing car park, two areas of grassland adjoining the visitor car park, and land to the east of the visitor centre that will house the new facilities building. The car park will be extended to meet the increased visitor numbers attending the Park as a result of the additional and improved facilities provided as part of the LUF. The additional spaces will retain a suitable walking distance from the visitor centre and amenities contained within the Country Park. In terms of the new facilities building, it will offer a suitable space to house additional equipment for the required maintenance of the Park.
- 6.3 The impact upon the registered park and garden has been considered as part of the application. The impact upon the Park is set to be positive, as an extension to the car park will prohibit development of spaces within the surrounding Parkland. Furthermore, this aspect of the LUF bid is necessary in order to accommodate the projected increase in visitor numbers to the Park. In terms of the new facilities building, the structure will aim to blend in with its immediate surroundings in order to not disrupt the character and appearance of the Park. The siting of the building has been carefully considered in order to have minimal visual impact.
- 6.4 This document has demonstrated that the development, as proposed, is compliant with relevant policies contained within the adopted NPTCBC LDP, in particular Policies EN3 (Green Wedges), SP21 (Built Environment and Historic Heritage), SP13 (Tourism), TO1 (Tourism Development in the Countryside), Policy SP20 (Transport Network) Policy TR2 (Design and Access of New Development) and BE1 (Design). In addition to this, the proposal accords with relevant Technical Advice Notes and policies noted within Future Wales and Planning Policy Wales.
- 6.5 Notwithstanding the above, a comprehensive assessment is provided in Section 5 of this statement. Separate supporting documents in

respect of material considerations are also included in the application package and highlight the proposal as acceptable in all regards.

- 6.6 As such, it is concluded that the proposal fully accords with both national and local policies. Furthermore, there are no material considerations which would prevent the planning application from being determined in accordance with the relevant planning policy framework. In this respect, it is respectfully requested that Neath Port Talbot County Borough Council consider this planning application favourably and grant planning permission for the proposed development.