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PLANNING SUPPORTING STATEMENT

LAND WEST OF DAN Y GRAIG
PONTWALBY
GLYNNEATH

Revised 2024



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1.0 INTRODUCTION

1.1 On behalf of our client, Herbert R Thomas submit this revised Planning Statement in support of an outline application with ALL matters reserved for the development of three dwellings on a parcel of land to the west of Dan y Graig, Portwalby, Glynneath.

1.2 This application is a resubmission of a previously approved outline planning application (with detailed Access) on the same site, approved 2006 and an extension of time approved via Section 73 in 2009 (Ref 2009/0417).

1.3 This scheme was submitted in summer 2023 (Ref: P2023/00303) however the application was withdrawn as additional information was requested by NPTCBC with regard to DCWW apparatus. This additional information forms part of the new submission via the Planning Portal and the application submitted comprises:

- Application form and certificates
- Site location plan
- Proposed site layout (Block) plan (revised Rev H)
- Site levels and sections (revised Rev H)
- Planning Supporting Statement
- Design Statement
- Access information
- Tree Survey Report and Tree Protection Plan
- Flood Consequences Assessment Report (Rev FCA)
- Preliminary Ecological Assessment (PEA)
- Topographical Survey
- Green Infrastructure Technical note

1.4 This Planning Statement outlines the context within which the application is made, and provides a detailed examination of the main planning considerations relevant to the proposals, together with reasoned justification in support of the proposed development. The statement is structured as follows:

- **Section 2** provides a description of the characteristics of the site and surrounding area;
- **Section 3** considers details regarding the planning history associated with the site;

- **Section 4** provides details of the development proposals, how these have evolved and the design objectives (further information provided as part of separate Design Statement);
- **Section 5** sets out the relevant planning policy framework at both national and local level in relation to the site and the development;
- **Section 6** analyses the key planning considerations arising from the proposed development (in light of the planning policy context);
- **Section 7** provides a summary and our conclusions.

- 1.5 The report should be read in conjunction with the rest of the information outlined in paragraph 1.3 and the separate appendix to this report.
- 1.6 Should you have any questions with regard to any of the above the submission please ensure (see cover letter) you contact Anna Cheney in the first instance anna.cheney@hrt.uk.com.

2.0 THE SITE AND SURROUNDING CONTEXT

- 2.1 The application site promotes development of a parcel of land of approximately 0.28 hectares within the County Borough of Neath Port Talbot.
- 2.2 The current use of the site is open grass land with a small timber storage shed and would be considered to be underutilised. The site had been used for various uses in conjunction with the house of Dan y Graig to the east (recently sold separately). No permanent buildings are present on site. See Appendix 1 for a plan of the site edged red.



Figure 1: The site in context of the surrounding residential development.

- 2.3 The site is accessed via a hard surfaced driveway secured with wide steel gates (see Photos in Appendix 2 and separate access statement) opening to Glan Gwrelych, a winding road comprising approximately 40 residential dwellings of mixed period and design. Glan Gwrelych (see photos of this road shown in Appendix 2) is accessed from the main road (Merthyr Road / Aberdare Road – see photos of this junction in Appendix 2).
- 2.4 To the north lies the stream 'Nant Gwrelych' that flanks the edge of the larger parcel of land, within which the development site lies. Nant Gwrelych flows toward the River Neath to the north. To the east of the site and down a steep bank, lies Nant Gwrelych and a small, timber

pedestrian footbridge leads over the river to the residential property known as Dan y Graig. Dan y Graig sits in its own grounds, with vehicular access gained from a lane that joins Merthyr Road (note no vehicular access is available from the site to this property due to the Nant Gwrelych that runs between). To the south lies a steep wooded bank leading to the Brunel designed Pontwalby railway viaduct at high level. To the west lies the access from the site to Glan Gwrelych (fit for vehicles and pedestrians), and neighbouring properties set in private garden areas.

- 2.5 The topography of the site is gently sloping from south down to the north, therefore sloping from the access down towards Nant Gwrelych in the north and east. The edges of the site are characterised by trees and hedging (some mature), the central area being mostly clear and comprising rough grassland.
- 2.6 The wider area is characterised predominately by a wide mix of type, size and period of residential properties in the most part being set in garden areas with their own off street parking. See Figure 2 below for the context of the wider area, the site being marked with a small white pin.
- 2.7 Bus services are available on Merthyr Road at the junction with Glan Gwrelych (known as Pontwalby Bridge at around 500-600m distant from the proposed development via a walk along Glan Gwrelych). The closest train station is located in either Aberdare (8 miles) or Neath (12 miles).
- 2.8 A Public House is located on Aberdare Road. Key services and facilities including shopping, leisure centre, primary school and medical facilities are provided a short distance (approximately 1 mile) away in the small town of Glynneath.



Figure 2 – The site (north of the Pontwalby Viaduct), marked with a white pin in context of the surrounding settlements.

3.0 PLANNING HISTORY

3.1 The online NPTCBC planning register was accessed (March 2024) to establish the recent planning history. The application site has been subject to a number of planning applications in the past, these are noted in the table below.

Table 1: Planning history summary

Reference	Location	Proposal	Decision Date	Decision
<i>P2023/0303 18/4/23</i>	<i>Land at Dan Y Graig</i>	<i>Outline residential development for 3 dwellings</i>	<i>-</i>	<i>Withdrawn 15/6/2023</i>
<i>P2009/0417</i>	<i>Land west of Dan y Graig</i>	<i>Section 73 application to vary condition 3 (time) of permission P2006/0307</i>	<i>14/06/2010</i>	<i>Outline (with Access) Approval with conditions</i>
<i>P2006/0307</i>	<i>Land west of Dan y Graig</i>	<i>Outline residential development for 3. No detached dwellings with garages</i>	<i>27/4/2006</i>	<i>Outline (with Access) Approval with conditions</i>
<i>2/3/91/0501/03</i>	<i>Field, Dan y Graig</i>	<i>Parking of 8 tonne lorry</i>	<i>16/07/1992</i>	<i>Approval for 2 years with conditions</i>
<i>2/3/94/0354/04</i>	<i>Field, Dan y Graig</i>	<i>Parking of 8 tonne tipper lorry</i>	<i>06/10/1994</i>	<i>Renewal of temporary consent with conditions (5 years)</i>
<i>2/3/77/0249/03</i>	<i>Glan Gwrelych, Pontwalby</i>	<i>Filling in of land</i>	<i>29/03/1978</i>	<i>Approval with conditions</i>
<i>2/3/76/... (poor quality of copy)</i>	<i>Glan Gwrelych, Glynneath</i>	<i>Filling in of land and provision of vehicular access</i>	<i>23/11/1976</i>	<i>Refusal*</i>
<i>2/3/76/0467/01</i>	<i>Pontwalby Glynneath</i>	<i>Developing area for one bungalow</i>		<i>Outline Approval with conditions</i>

**Reason – The engineering operation as carried out is unsatisfactory in structural terms to adequately form a means of access and also ensure the free flow of the stream.*

3.2 From the above table it is clearly evident that the principle of residential development for this site is long established. Note the outline application in 2023 was withdrawn in order to settle a matter in connection with DCWW. Further details with regard to the changes made to the scheme and the response from DCWW are contained in this report (Section 4 and Appendix 4).

3.3 The principle of residential development of the site is evidenced by the applications previously approved for the residential development of 3 detached dwellings with garages (Outline with Access) in 2006 reference P2006/00307. In 2009, a planning application sought to vary condition 3 of the above permission in order to allow an extension of time to develop the scheme. This application reference P2009/0417 raised a couple of issues that were overcome and was also approved (under the NPT UDP) with the Planning Officer concluding that:

The proposed variation of the condition for the extension of time to commence works on site is acceptable as there has been no material change in circumstances since the original planning permission was approved. The proposal therefore complies with policies GC1, T1, T10, ENV17 and H3 of the Neath Port Talbot Unitary Development Plan and approval is recommended. (NPTCBC Officer Report 20/4/2010).

3.4 Matters of note from the previous approval include street scene, residential amenity, flood risk, ecology and highways. These matters are noted below out of completeness and to provide context for this current application.

3.5 **Street scene** – the Officers report states that while no specific details are provided the indicative layout submitted shows an '*acceptable street picture can be achieved and that development would not have an unacceptable impact upon the character and appearance of the surrounding area*'.

3.6 **Residential Amenity** – The Officers report states '*The indicative layout shows that it is possible to accommodate an appropriately designed residential development on the site without having an adverse impact upon the residential amenity of the neighbouring properties*'.

- 3.7 In addition it should be noted there has been no material change in circumstances in the relationship with the adjacent dwellings since the original outline planning permission was granted. The nearest property remains approximately 25m away.
- 3.8 **Highway safety (Access, Parking and Traffic Flows):** The Head of Engineering and Transport recommended refusal as Glan Gwrelych is *'narrow and lacking footways with barely room for two vehicles to pass, also with a sub standard visibility onto Merthyr Road and further traffic generation along this road will be detrimental to highway safety and the free flow of vehicles and pedestrians'*.
- 3.9 The planning officer however, in regard to the above comment from Highways, stated:
'Glan Gwrelych is effectively a cul-de-sac with around 40 dwellings. Whilst the road is narrow in certain locations and its junction with Merthyr Road is not to current visibility standards it is primarily used by local traffic where drivers are aware of the local highway conditions'.
- 3.10 The planning officer went on to say:
'There is limited scope available for further residential development along the road in view of potential flooding, adjacent to Afon Nedd, therefore it is considered three additional dwellings will not materially lead to a significant increase in perceived highway safety conditions. It is therefore considered that the application would not have an unacceptable impact upon highways and pedestrian safety'.
- 3.11 **Ecology** – The Local Authority Biodiversity Officer recommended that a 7m buffer be put in place between the development and the river, within which no development or vegetation clearance should take place. The buffer Zone is shown in green hatched area on the plans in Appendix 1. A condition was duly placed on the previous permission regarding this buffer (condition 22).
- 3.12 **Flooding** – The Environment Agency (EA) (now Natural Resources Wales, NRW) note that the buffer zone (as marked in Appendix 1) does not cover the entire area at risk of flooding and that part of the curtilage of Plot 3 would still be affected during a flood event. At the time of the application the EA therefore recommended the site boundary be amended to exclude this area (as it was a Section 73 application this was not possible), however a condition was imposed to ensure the area susceptible to flooding is excluded from Plot 3 and the applicant submitted a letter of acceptance to the consequences. The officer writes:

'it is therefore considered that with the above condition and the acceptance of consequences that the flood risks are considered to be minimal and not reason to justify a reason for refusal.'

- 3.13 The discussions with DCWW were extensive in relation to the previous application and agreed the proposals could be taken forward provided the development adhered to conditions including the dwellings remained 5m from the DCWW apparatus. Appendix 1 contains the 'historic plan' that marks the line of the DCWW trunk main. This information was been taken as accurate given the previous approval however discussions during 2023 led to further investigative work to prove the location of the main in the context of the proposed scheme and revision of access to the dwellings to satisfy DCWW. See Appendix 4 for DCWW paperwork from the previous permission on this site and the correspondence of 2023 and 2024 relating to the current submission. In conclusion the DCWW planning liaison officer confirms in the light of the design changes they would conditionally support the scheme.
- 3.14 It is noted that the previous applications of 2006 and 2009 were supported by NPTCBC under the former development plan. The proposals subject to this application are considered in the following section in relation to the current, relevant national and local planning policy context of the adopted Local Development Plan.

4.0 DEVELOPMENT PROPOSALS

- 4.1 The application proposes an outline planning application for 3x No. detached dwellings, with all matters reserved.
- 4.2 The application proposes similar details to that of the previous submission (P2006/0307, 2009/0417 and withdrawn application P2023/0303)). A minor amendment has been made to the access to the dwellings due to the movement of the access drive to move away from DCWW apparatus. In addition the site boundary was very slightly amended when compared to 2006/2009 permissions due to reasons that arose with the previous application in terms comments from Natural Resources Wales (NRW) in relation to flood risk. Please see Section 5 for further details. .Note however that all matters are reserved for a later date.
- 4.3 The number of properties, plot divisions and location of the dwellings within the plots remains broadly as per the approved outline plans of 2006/2009. The indicative layout shows the site having the ability to be split in to 3 plots, each comprising a detached dwelling with off street parking by means of a driveway for 2 cars per dwelling and private garden area. The garden areas are considered acceptable, noting the plot furthest west has the smallest garden get given the openness of the rest of the area this is considered acceptable (note the movement of the access slightly south has allowed for a little more garden area for this dwelling).
- 4.4 The homes will front a small private road that serves as the access to the development. The line of this road has slightly amended from the approvals of 2006/2009 (and the withdrawn P2023/0303 application) in order to satisfy the requirements of DCWW. The road now sits further to the south, hugging the southern boundary of the site.
- 4.5 The applicant owns the majority of the land with legal right of way over the mouth of the access. See accompanying note regarding access.
- 4.6 The original design of the dwellings intended to provide a single storey dwelling with the provision of internal stairs and a dormer window for use of the roof space. The scale of the dwellings is therefore likely to be similar to that of the approved scheme though there is scope to potentially achieve the maximum scale as stipulated below. See below for the maximum and minimum range of scale that was submitted post approval in 2009. These form the

indicative scale for this application however please note this will ultimately be determined at the reserved matters stage and is provided below as a range.

Table 2 – Maximum and Minimum scale of development (2009)

Maximum length 12 m	Maximum width 14 m
Minimum length 10m	Minimum width 12 m
Maximum height 9 m	Minimum height 7 m

- 4.7 It is noted that mature trees and hedging on the site will be retained as far as practical and those surrounding the site will be protected. Please see attached Tree Survey report for further detailed information on the effects of the development on the trees within and surrounding the site and mitigation measures where necessary. It is noted that 2 trees are proposed to be felled in order to facilitate the scheme. It is proposed six native species, as of local a provenance as possible will be included within the design to compensate for the loss of the two trees scheduled for removal. Species chosen are two *Sorbus aucuparia*, two *Prunus padus* and two *Corylus avellana*. Please see Technical Note from BEEcological for further information on Green Infrastructure and the stepwise approach.
- 4.8 Land in the ownership of the applicant and not proposed for development is outlined blue on the plan in Appendix 1. It is evident that a large proportion of the land is to remain open on the east and southern portion of the site to allow openness within the site and separation between the development and the river and also the wooded bank of the Pontwalby Viaduct. You will also see that the redline boundary for the scheme has been slightly revised from that permitted in 2006/2009 in order to ensure that the mouth of the access and any work required here is achievable and that no area of the site could potentially be associated with flood risk – see accompanying FCA report (by Tulip Engineering) for further details.
- 4.9 Further information relating to the overarching design principles of this outline proposal is provided in the Design Statement (DS) that accompanies this application out of completeness and to inform the process. To clarify, the potential requirement for a DAS is not triggered from the potential scale of the 3 dwellings cumulative floorspace (circa 100 sq m), nor the site size of 0.28 ha (the trigger being 0.5 ha or more). The site is not located within a conservation area or World Heritage Site.

DCWW discussions:

- 4.10 Discussions with DCWW have taken place following the Withdrawal of the 2023 scheme given there was resistance to the submitted sketch plan showing the actual line of the water main. The applicant commissioned Alpine Land Surveys to establish the line of the main that broadly accorded with the sketch plan submitted (and approved from the 2006/2009 applications). Once the line of the main was re-established the discussions culminated in a meeting on 10th November 2023 including the applicants, DCWW planning liaison officer Chris Scourfield, DCWW Engineer Andrew Wall and Anna Cheney (HRT).
- 4.11 The meeting concluded that the scheme should revise the line of the access roadway to avoid the DCWW main as far as possible. It was acknowledged there would be a small stretch (circa 2m) where the hard surface access would cross the main (note the existing hard standing access crosses the apparatus), however the majority of the proposed access drive would ensure it is situated away from the main.
- 4.12 The location of the dwellings is at least 5m from the main as per the previous conditions.
- 4.13 Submission of the revised plan was made to DCWW in early 2024. See layout plan, an extract is provided below for ease of reference. Recent discussions during 2024 concluded that DCWW 'can offer our support but with the need for the previous conditions'. The applicant is aware of the need for the conditions to protect the apparatus beneath.



Figure 3 – revised plan (extract) of proposal showing road as far away from DCWW main as possible (Plan Ref 2229-007 CFW Architects)

- 4.14 Section A shows the people are standing in the front garden, this is at house floor level. The thin black line is the line of the drive/parking spaces that come down off the roadway level approaching the house level. Similar sections is shown in B (and C on the full plan, yet not in the extract above) except section A does not have a car shown side on.
- 4.15 The three houses have similar parking arrangements with the roadway being kept above the water main level, then the houses are set approximately 1 metre below this road level. The drives slope down to the properties in order to minimise the need for too many steps (or alternatively ramps).

5.0 PLANNING POLICY CONTEXT

- 5.1 A review of the planning policy context associated with the site and proposed development (at the national and local level) is provided within this section of the Statement. The key planning policies of relevance to the determination of the application are outlined. Please see Appendix 3 for LDP policies in full. A detailed assessment of the accordance of the proposed development with these policies is provided in Section 6 (Material Considerations) of this Statement.

National Planning Policy

- 5.2 Planning Policy Wales (12th Edition, February 2024)

Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

Key Planning Principles

- 5.3 Paragraph 2.13 states that “The plan-led system underpins the delivery of sustainable places. To ensure all development plans and decisions taken by the planning system work together to deliver sustainable places. The Key Principles represent a guiding vision for all development plans, including Future Wales”. The key principles are as follows:

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

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

5.5 PPW also states in paragraph 4.4.2 5 that the planning system must:

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

5.6 Since the withdrawal of the application in June 2023, revisions to PPW are relevant to this application, specifically Chapter 6 . The main changes to policy are as follows:

- Green Infrastructure (Page 135, Section 6.2): provides a stronger emphasis on taking a proactive approach to green infrastructure, the submission of a proportionate green infrastructure statement with planning applications and signposting Building with Nature standards.
- Net Benefit for Biodiversity and the Step-wise Approach (Page 143, Section 6.4): requires the securing of net benefit for biodiversity through application of the step wise approach. There is also a need to consider enhancement and long-term management at each step.

Technical Advice Notes

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

- ***Technical Advice Note (TAN) 2 : planning and affordable housing*** (June 2006)
Local authorities have key strategic and enabling roles in the provision of affordable housing. Housing and planning authorities must work together to create the policy framework for the provision of affordable housing and should adopt a collaborative approach to preparing, co-ordinating and implementing local housing strategies, development plans and Supplementary Planning Guidance (SPG).
- ***Technical Advice Note (TAN) 12 – Design*** (March 2016) providing the objectives of good design. The objectives of good design are set out within the following

categories and discussed further in the design and access statement: Access, Movement, Community Safety, and Environmental Sustainability.

- **Technical Advice Note (TAN) 15: development and flood risk** (July 2004) advises caution in respect of new development in areas of high flood risk by setting out a precautionary framework to guide planning decisions in so far as the should direct new development away from those areas which are high risk of flooding. Where development has to be considered in high risk areas (Zone C) only those developments which can be justified on the basis of the tests contained in the TAN are located within such areas. The Development Advice Map (DAM) stipulates this site as broadly free from flood risk. The river corridor is marked as Zone C2 and a small immediate surrounding area to the area is marked as Zone B. The map is based on Natural Resource Wales' extreme flood outlines (Zone C) and the British Geological Survey drift data (Zone B). Zone B, areas known to have been flooded in the past evidenced by sedimentary deposits, data originally published 2004, updated in 2017, Zone C data revised quarterly. The DAM map and Flood risk Assessment Wales Map are shown in figure 4 and 5 respectively. Any floodrisk created in Zone C2 (located in a small area of the garden of the development) will be dealt with by the revision to the site boundary.



Figure 4 - DAM Map showing floodrisk Pontwalby

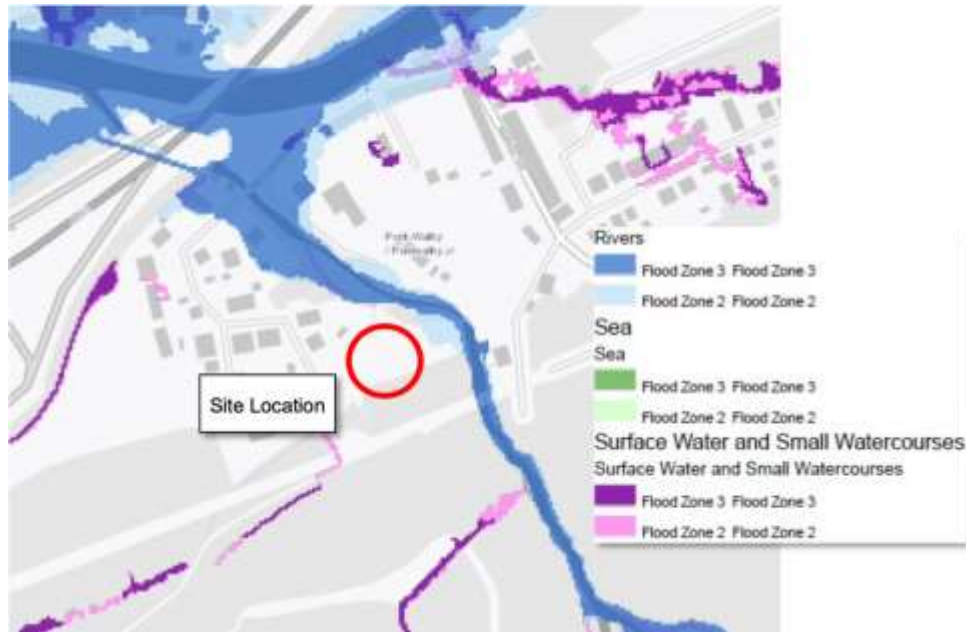


Figure 5 – Map for Planning (Floodrisk Assessment Wales Map; Pontwalby)

- 5.8 The above listed National policy of PPW and the more detailed TAN topics are promoted through the provision of the Local Development Plan (LDP) and other guidance such as Supplementary Planning Guidance (SPG) produced by the Local Planning Authority (LPA).

Local Planning Policy

- 5.9 The local planning policy context is discussed in this section. First the adopted plan is considered and important information is then provided with regard to the ongoing preparation of the RLDP.
- 5.10 **NPTCBC LDP 2011 – 2026** is the current adopted LDP for the area. The following extract shows the relevant section of the proposals map. The site can be seen shaded yellow, shown as an open grassland area and set within the settlement limits of Pontwalby. Pontwalby is identified in the local plan as part of the District Centre with Glynneath (settlement with good transport links and a wide range of functions serving the immediate and surrounding communities).



Figure 6: Extract from the NPTCBC LDP 2011-2026

- 5.11 The site is not covered by any specific allocation or designation (other than being located within the settlement limit). General policies of the LDP guiding development would therefore apply with specific consideration of the following policies :

Strategic Policies: *SP3 – sustainable communities*

SP7 – Housing requirement

Detailed Policies: *SC1 – Settlement limits*

H1 – Housing sites

SP8 – Affordable housing

AH1 – Affordable Housing

EN7 – Important natural features

BE1 – Design

- 5.12 Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy and subject to it being proportionate in scale and form to the role and function of the settlement.

- 5.13 The Upper Neath Valley Strategic Growth Area shows Glynneath as the key settlement in the upper Neath Valley and has good links to the upper Dulais Valley and the Brecon Beacons National Park as well as to Neath and the Coastal Corridor Strategy Area via the A465 (T) Dual Carriageway. *'Significant growth in the Glynneath Area / Upper Neath Valley will therefore benefit the wider area and enhance the sustainability and attractiveness of both*

Glynneath and Resolven. The area is well placed to benefit from tourism developments especially those associated with the 'Waterfall Country' and the Brecon Beacons National Park'.

Reference	Allocation	Site Area (ha)	Estimated No. of Units
Housing			
H1/23	Park Avenue, Glynneath	13.2	150
H1/LB/27	Heol Y Glyn, Glynneath	2.7	81
H1/LB/28	Welfare Hall, Glynneath	0.8	17
H1/LB/29	Ynys Y Nos Avenue, Glynneath	0.5	16

Table 3 - Upper Neath Valley Strategic Growth Area Allocations (taken from the NPTLDP 2011-2021)

- 5.14 The LDP provides a framework for the development of 8,760 additional residential units. This is greater than the identified housing need in order to provide a 12.31% flexibility allowance for sites not coming forward as anticipated.
- 5.15 Whilst the development is only for 3 dwellings it still will make a small contribution to the housing supply of the area through the 'small site supply / completion' (those sites with less than 10 residential units). The NPT Joint Housing Land Availability Study 2019 housing land supply figure for the NPTCBC area is determined as 4.5 years and therefore the development would aid in meeting the short fall in the 5 year requirements.
- 5.16 **Full Review of Neath Port Talbot LDP.** Work on the replacement LDP (RLDP) of 2023-2038 commenced in 2021 and proposes an adoption date of April 2027. The candidate site consultation closed end of May 2022. A further call for candidate sites closed December 2023. Note this site being 0.28 ha was under the 0.3 ha threshold to be submitted to the council as a 'formal' candidate site however it was forwarded for NPTCBC records in order to inform the forward housing trajectory.
- 5.17 The Council are now considering the submitted candidate sites and the next stage of the RLDP preparation will be the preferred strategy that is due for consultation November – December 2024.

5.18 In view of the above and the mid (rather than later) stage of the RLDP, it is considered that the policies of key relevance to this application remain those from the adopted plan as referenced in the start of this section. In addition are the adopted Supplementary Planning Guidance notes that are reviewed in the paragraphs below.

5.19 **Supplementary Planning Guidance (SPG)** is produced by the LPA providing additional guidance to that of the LDP. The SPG of relevance for this application are:

- ***Affordable Housing SPG published October 2016*** – this confirms there is 0% affordable housing requirement in Glynneath (as part of the Neath Valley). Note this is a change to the requirement of the 2009 renewal where affordable housing was noted in condition 16 of that permission under the old UDP for NPT (Policy H4). Further research has demonstrated in the Affordable Housing viability study of 2012 found the valleys areas did not support the provision of affordable housing, and therefore no affordable housing contribution is required in the Afan Valley, Amman Valley, Dulais Valley, Neath Valley or Swansea Valley spatial areas.
- ***SPG Parking Standards published October 2016*** Interpretation and application of the standards rests with the Local Authority, but flexibility in the standards allows local circumstances to be taken into account. The residential new build and conversions standard for houses is 1 space per bedroom (maximum requirement 3 spaces). For visitors 1 space per 5 units is stipulated. Curtilage parking must be provided where possible and garages should be provided as the most secure option with safe pedestrian passage between spaces and dwelling.
- ***SPG Open Space and Greenspace published July 2017*** seeks In accordance with Policy OS1, in locations where there is a quantitative deficiency in one or more of the identified categories of open space, contributions will be required on all new housing developments on sites accommodating 3 or more units. In this instance as only a small proportion of the site is to be developed with the remainder left open it is considered the onsite provision of open space will be met in line with policy. Therefore no off site provision or contribution should be applicable for this submission.
- ***SPG Design published July 2017***: The Council's planning policy is set out in the Neath Port Talbot Local Development Plan (LDP), namely Strategic Policy SP21 (Built Environment and Historic Heritage) and detailed Policy BE1 (Design) and this SPG

should be read in the context of these policies and explanatory text. A key Principle of infill development is stated that Developers should identify how their proposals consider and respect the character of the area within which they are located, promote quality and enhance the street scene. In the submitted design the development is considered to take design cues from the surrounding area, ensuring it respects the lower density, semi rural feel of this part of Pont Walby. The open land to the south (beyond the viaduct) marks the open countryside and the scheme has been designed with this in mind. The revision of the access road to the south ensures the garden areas, especially the front garden of Plot 1 can be as large as possible.

6.0 MATERIAL CONSIDERATIONS

6.1 In this section the material considerations are summarised under each heading.

Nature of proposed use

6.2 It is confirmed by the planning history in Section 3 that the principle of residential development of No. 3 dwellings on this site has been long established. The development will make a small contribution to the housing supply for the borough.

6.3 The density of the proposal is 10.7 dwg/ha. Whilst this is below the expected 35 dwg/ha the design seeks to reflect the edge of settlement location, together with respect of those existing dwellings surrounding the site. These factors provide a lower density scheme. The constraints of the site including the Nant Gwrelych that borders the site, the topography and the existing and proposed planting all impact the scheme design creating a density of housing development below average on this fringe site.

6.4 The development of 3 dwellings on the site will complement the surrounding residential uses of the area and provide sufficient open area and buffer to the river, in line with the previous permission.

6.5 Impact of proposed use on amenity of neighbouring properties has been considered in the previous applications and is deemed to be of a sufficient distance and orientation so as not to harm the amenity of the surrounding residential properties.

Ecology, Biodiversity and Green Infrastructure

6.6 Ecology and nature conservation has been considered and the mature vegetation surrounding the site comprising of trees and hedgerow will be retained as far as practical in order to preserve any natural habitats and wildlife corridors it may support.

6.7 A tree survey has been carried out in accordance with BS5837 and an accompanying report details 2 trees, of low quality, will need to be removed to facilitate the scheme. (Note the removal of Tree4 is still required despite the revision of the line of the access road). Mitigation of this loss is also detailed as part of the application. Noting the recent policy contained within Chapter 6 of PPW No. 6 trees are proposed to compensate the loss of the 2 trees. The Technical note from BEEcological of March 2024 details the native species proposed.

Flood risk

- 6.8 Flood risk has been assessed on the basis of the current DAM maps and the site boundary is amended accordingly from the previous submission on this site to ensure there is no evidence of the DAM maps conflicting with the site area for development of the dwellings in terms of floodrisk.
- 6.9 The applicants advise despite the zoning on the plan the area has not flooded in their memory.
- 6.9 Note an FCA report is submitted as part of the application and concludes the development as proposed meets the key TAN 15 requirements including a flood-free development and emergency access route and no flood risk increase elsewhere. As a precautionary measure the developer may choose to incorporate flood resilience measures in the detailed design and construction, for example entrance flood gates, flood resilient doors and windows, self-closing air bricks, and elevated electrical sockets. Note that the FCA has been updated in light of the changes in levels with regard to the most recent layout plan moving the access road as far as possible toward the

Residential and visual amenity

- 6.10 The nearest neighbouring property to the application site approximately 25m distant to the north west and screened by a wooded area that is now subject to TPO. Any loss of trees (x2) to facilitate the development will be mitigated by No. 6 tree planting in the immediate vicinity of the site (as per the recommendation within the BEEcological technical note in line with PPW). The proposal is not considered to create an adverse impact on the residential amenity of the neighbouring properties.

Highway Safety

- 6.11 In line with the application of 2009, the access in to the site remains as per existing. The existing private access drive and gate being currently used by vehicles (and pedestrians) to access the site and parking of an 8 tonne lorry in the past (in connection with the owners business activities, see Planning History, Section 3), together with turning of NPCBC refuse vehicles to allow them to exit Glan Gwerlych in a forward gear.

- 6.12 It is considered that the local road, Glan Gwerylch is well placed to serve the development in so far as it is effectively a cul-de -sac and therefore will be used by those accessing properties and not as a 'through road'. The required visibility splays for egress from the development site on to Glan Gwerylch are considered to be achievable and will be demonstrated as part of the reserved matters stage.
- 6.13 In terms of the above history the access into the site is well established and has been used by HGV for many years prior (and more recently turning of NPTCBC dust carts)..
- 6.14 The applicant sought Legal advice and entered in to subsequent proceedings (by TLJ Solicitors, Neath) to formalise the access arrangement. An ST4 application was sought and finalised via Land Registry. There is a right of access over the 'driveway' that provides access in to the site. The remainder of the site is clearly within the longterm ownership of the applicant. Note a Notice C certificate was served in April 2023 with no person coming forward. This situation is still considered to be the case however for the avoidance of doubt an additional / supplementary notice was served at the time of submission and displayed in the Western Mail (attached). The council estates department were also contacted again in April 2024 confirming none of the area edged red is within their ownership.

7.0 SUMMARY AND CONCLUSION

- 7.1 The outline proposal (all matters reserved) is located fully within the settlement limit of Pontwalby as defined in the adopted NPTCBC LDP 2011-2021.
- 7.2 The development is proposed within an established residential area and is therefore considered in-keeping in its context and sympathetic to the neighbouring properties.
- 7.3 The residential proposal will provide a small addition to the 5 year housing supply that it is acknowledged is currently at a shortfall. It is noted the density is below the guidance for 30 dwg/ha in the Valleys area however the design seeks to respect the surrounding residential dwellings and the open countryside to the south.
- 7.4 Access to the development remains as existing to the site and is from the east via Glan Gwrelych. The access is well established having been used in the past for a lorry and regular access by domestic vehicles to the field by the applicants who enjoy a legal right of way. The road within the site avoid the DCWW main as far as possible. Conditions to ensure protection of the main have been discussed.
- 7.5 The development as proposed meets the key TAN 15 requirements including a flood-free development and emergency access route and no flood risk increase elsewhere.
- 7.6 The proposal seeks to meet the Green Infrastructure and seeks net benefit for biodiversity through the stepwise approach as prescribed by PPW.
- 7.7 In conclusion the proposals fit well with the surrounding area and provides a certain future and surveillance for this vacant underused site. The principle of development for residential use was established some years ago yet was unimplemented initially due to ill health.
- 7.8 Circumstances dictated that the proposal was not brought forward until now. Revisions have taken place in order to put forward the current outline scheme for 3 dwellings (all matters reserved). We would respectfully ask for your approval of this outline application that will bring both variety and choice of housing to Pontwalby.

APPENDIX

Please see separate appendix