

Pre-Application Consultation Report

Caewern House
Dwr-Y-Felin Road
Neath

May 2024

amity
planning consultants



Introduction	
	This Pre-Application Consultation Report has been prepared on behalf of Linc Cymru to accompany a full planning application for demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works at Caewern House, Dwr-Y-Felin Road, Neath. This report, and the consultation process, has been carried out in accordance with legislation provided by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (“the DMPWO”). In particular, the report complies with the requirement for major development to undertake a pre-application consultation exercise with the local community, stakeholders and specialist consultees. The proposal constitutes major development as it proposes the development of 10 or more dwellings. This report outlines the legislative framework of the mandatory exercise; the methodology used; the outcome of the statutory exercise; the applicant’s response to comments received; and a conclusion of the main findings.
Planning Policy and Guidance	
Planning Policy Wales	Paragraph 2.8 of Planning Policy Wales (Edition 12, 2024) sets out that the planning system should maximise contributions towards all the goals of the Well-being of Future Generations Act. Figure 4 summarises the key planning principles. In “Facilitating accessible and healthy environments”, PPW11 advises the following: <i>“Our built and natural environments should be planned to promote mental and physical well-being. The best way of achieving this is to involve and collaborate with others to ensure issues are understood and prevented at the earliest opportunity through effective engagement with those affected by or having an interest in the development concerned.”</i>
Practice Guide: Realising the Potential of Pre-Application Discussions (2012)	The Welsh Government provides advice and encouragement to applicants to enter into pre-application discussions through the ‘Practice Guide: Realising the Potential of Pre-Application Discussions (2012)’. Paragraph 3.15 of this guide advises that: <i>“Applicants may wish to discuss development proposals with local communities or the representatives of local communities, which may include community and town councils, prior to the submission of a formal planning application in order to gain an understanding of local concerns. Early discussions with local communities can, potentially, allow any concerns or issues to be addressed or mitigated in any formal planning application.”</i>
Statutory Pre-Application Consultation Requirements	
	The requirement for statutory Pre-Application Consultation to be undertaken in advance of the submission of an application for major development is identified within Part 1A (Pre-Application Consultation) of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. The key requirements of this process are summarised below.
Publication of Draft Planning Application	Part 1A, Paragraph 2C (1)(b) of the DMPWO requires the applicant to make the following information available for inspection at a location in the vicinity of the proposed development for not less than 28 days: i) any documents and particulars or evidence that would be required for a subsequent application, in the same or substantially the same form, to be a valid application except certificates in relation to notices of applications for planning permission required; ii) a plan which identifies the land to which the proposed application relates; iii) any other plans, drawings and information necessary to describe the development which is the subject of the proposed application; iv) the design and access statement; and the particulars or evidence required by the local planning authority

Publicity by Site Notice	Part 1A, Paragraph 2C (1)(a)(i) of the DMPWO requires the applicant to publicise the proposed application by displaying a site notice in at least one place on or near the land to which the proposed application relates for not less than 28 days.
Publicity in Writing	Part 1A, Paragraph 2C (1)(a)(i) of the DMPWO requires the applicant to publicise the proposed application by writing to any owner or occupier of any land adjoining the land to which the proposed application relates.
Community Consultees	Part 1A, Paragraph 2D of the DMPWO requires the applicant to consult in writing with 'any community consultees' (namely local/community/ward Councillors).
Specialist Consultees	Part 1A, Paragraph 2D of the DMPWO requires the applicant to consult in writing with 'any specialist consultees' (comprising the list of consultees in schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by the 2016 Order), providing details of the scheme and 28 days for the specialist consultees to respond.
Pre-Application Consultation Report	Part 1A, Paragraph 2F of the DMPWO requires the applicant to prepare a pre-application consultation report which gives particulars of: a) how the applicant complied with section 61Z of the 1990 Act; b) any response to the consultation received from any person consulted under section 61Z(3) or (4) of the 1990 Act; and c) the account taken of those responses and must include a) a copy of the notice referred to in article 2C(1)(a)(i); b) a declaration that the notice referred to in article 2C(1)(a)(i) was displayed in accordance with the requirements of that article; c) a list of the addresses of persons who were given notice of the proposed application in accordance with article 2C(1)(a)(ii) and a copy of the notice given to such persons; d) copies of all notices given to community consultees and specialist consultees in accordance with articles 2D(2) and 2D(3); e) a summary of all issues raised by any person notified of the proposed application in accordance with section 61Z(3) of the 1990 Act and articles 2C and 2D(2), including confirmation of whether the issues raised have been addressed, and, if so, how; and f) copies of all responses received from specialist consultees with an explanation of the account taken of each response.

Methodology

Publication of Draft Planning Application	On 28 November 2022, Amity Planning as the applicant's agent displayed a draft planning application package on its website (www.amityplanning.co.uk), which was made available until 26 December 2022, in excess of the 28-day consultation period. The information displayed on the website comprised the following: <u>Architectural Plans</u> Site Location Plan Site Layout Plan Site and Access Layout Block A - Front and Side Elevation Block A - Rear and Side Elevation Block A - First Floor Plan Block A - Ground Floor Plan Block A - Second Floor Plan Block B - Front and Side Elevation Block B - Rear and Side Elevation Block B - Ground and First Floor Plan Block B - Second Floor Plan Site Sections C and D Site Sections E and F
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	<u>Perspective Images</u> Perspective 01 Perspective 02 Perspective 03 Perspective 04 Perspective 05 Perspective 06 Street Scenes <u>Tree Survey</u> Tree Survey Report Tree Constraints Plan A3 Caerwen House_Neath <u>Ecology Surveys</u> Preliminary Ecological Appraisal Bat Survey Report <u>Engineering/Drainage Strategy</u> 2609-500 - SuDS Strategy Plan 2609-501 - Existing Drainage Plan 2609-502 - Foul Drainage Strategy 2609-505 - Engineering Levels Plan <u>Transport Statement</u> 161122_22-379-20 - Transport Statement_v00 <u>Site Investigation</u> Site Investigation Report <u>Coal Mining Risk Assessment</u> Coal Mine Risk Assessment <u>Design And Access Statement</u> 2609 Caewern DRAFT DAS 24112022 <u>Application Form</u> Draft Application Forms - Caewern In line with Circular 32/92 Publicity for Planning Applications, site notices were displayed in three locations within a close proximity to the application site on 28 November 2022. The site notice contains all information set out in Schedule 1B Articles 2C and 2D of the DMPWO in both English and Welsh. A plan showing the locations where the site notices were displayed, and letters handed can be found at Appendix 2. A copy of the site notice can be found at Appendix 3, and photographs of the site notices as displayed can be found at Appendix 4. The notice identified that the draft planning application package could be viewed at www.amityplanning.co.uk and provided a contact phone number for requests for hard copies of the plans and documents. The notice also identified that representations about the proposed development could be made through an online feedback form at www.amityplanning.co.uk, or by post to Amity Planning Ltd, Suite 212, Creative Quarter, Cardiff, CF10 1AF.
Publicity in Writing	Notices and letters addressed to the 'Owner/ Occupier' of neighbouring properties (see Appendix 5) were delivered to neighbouring properties on 28 November 2022. The following properties were consulted: Caewern House, Dwr-Y-Felin Rd, Neath SA10 7RH 1 Twyn Teg, Neath, SA10 7RN 3 Twyn Teg, Neath, SA10 7RN 5 Twyn Teg, Neath, SA10 7RN 7 Twyn Teg, Neath, SA10 7RN 9 Twyn Teg, Neath, SA10 7RN

	11 Twyn Teg, Neath, SA10 7RN 13 Twyn Teg, Neath, SA10 7RN 15 Twyn Teg, Neath, SA10 7RN 17 Twyn Teg, Neath, SA10 7RN 19 Twyn Teg, Neath, SA10 7RN 21 Twyn Teg, Neath, SA10 7RN 23 Twyn Teg, Neath, SA10 7RN 25 Twyn Teg, Neath, SA10 7RN 27 Twyn Teg, Neath, SA10 7RN 29 Twyn Teg, Neath, SA10 7RN 31 Twyn Teg, Neath, SA10 7RN 33 Twyn Teg, Neath, SA10 7RN 35 Twyn Teg, Neath, SA10 7RN 37 Twyn Teg, Neath, SA10 7RN 39 Twyn Teg, Neath, SA10 7RN 41 Twyn Teg, Neath, SA10 7RN 43 Twyn Teg, Neath, SA10 7RN 45 Twyn Teg, Neath, SA10 7RN 47 Twyn Teg, Neath, SA10 7RN 49 Twyn Teg, Neath, SA10 7RN Tŷ Twyn Teg, Neath, SA10 7RN Caewern Community Centre, Heol Illtyd, Neath, SA10 7SF 20 Heol Illtyd, Neath, SA10 7SF 18 Heol Illtyd, Neath, SA10 7SF 16 Heol Illtyd, Neath, SA10 7SF 14 Heol Illtyd, Neath, SA10 7SF 12 Heol Illtyd, Neath, SA10 7SF 10 Heol Illtyd, Neath, SA10 7SF 8 Heol Illtyd, Neath, SA10 7SF 6 Heol Illtyd, Neath, SA10 7SF 4 Heol Illtyd, Neath, SA10 7SF 2 Heol Illtyd, Neath, SA10 7SF 2A Heol Illtyd, Neath, SA10 7SF Plas Bryn Rhosyn, Heol Illtyd, Neath SA10 7SE The notice identified that the draft planning application package could be viewed on www.amityplanning.co.uk and provided a contact phone number for requests for hard copies of the plans and documents. The notice also identified that representations about the proposed development could be made through an online feedback form on www.amityplanning.co.uk , or by post to Amity Planning Ltd, Suite 212, Creative Quarter, Cardiff, CF10 1AF.
Community Consultees	Under the provision of Schedule 1B Articles 2C and 2D of the DMPWO, the following 'community consultees' were consulted via email (see Appendix 6) on 28 November 2022. • Councillor Joe Hale • Councillor Chris Williams • Blaenhonddan Community Council
Specialist Consultees	Under the provision of Schedule 1C Article 2D of the DMPWO and in accordance with Schedule 4, the following 'specialist consultees' were consulted via email (see Appendix 7) on 28 November 2022. • Dŵr Cymru/Welsh Water • Neath Porth Talbot Council – The Highway/Drainage Authority • Natural Resource Wales • The Coal Authority The consultation identified that the draft planning application package could be viewed at www.amityplanning.co.uk and identified that consultation responses should be received no later than 26 December 2022.

Statutory Pre-Application Consultation Results

Local Residents/ the Public	Three members of the public have made representations about the development proposals. Responses can be summarised as follow: • Clarification was sought regarding the proposed location of the site access. • Opposition to the demolition of Caewern House. • Further social housing in a heavily social affordable dense area. • Cumulative impact upon the existing high volumes of traffic and congestion in Dwr y Felin Road. • Poor highway safety especially for children and young people that walk to the education centres nearby. • The three-storey nature of the development would be overbearing. • Trees and biodiversity will be undermined by the proposals. • Further pressure on the demand of local services which are already insufficient.
Community Consultees	<u>Councillor Chris Williams</u> No response <u>Councillor Joe Hale</u> No response <u>Blaenhonddan Community Council</u> A response was received by email on 14 December 2022. The re-development of the site is generally supported. However, the following detailed matters were raised: • Disappointment on the demolition of Caewern House. It is requested to revise the proposals to provide housing units by way of conversion of the building. • The new residents will put significant pressure on the use of local services and the highway infrastructure. • Sheltered and single person accommodation would generate less traffic and place reduced demand on local services.
Specialist Consultees	The following specialist consultees responded to the consultation. Copies of the responses can be found at Appendix 7. <u>Dwr Cymru/Welsh Water</u> No response. <u>Natural Resources Wales (NRW)</u> A response was received by email on 22 December 2022, stating that inadequate information had been regarding bats. Amity Planning sought further clarity on the consultation response. NRW subsequently confirmed by email on 11 January 2023 that there was no objection to the proposals including demolition of Caewern House. It was explicitly confirmed that any future application should be accompanied by a preliminary bat roost inspection, climbing inspections and/or activity survey for moderate to high category trees and a detailed plan outlining which trees require felling/ pruning, and their potential to support roosting bats. Furthermore, it was highlighted that a European protected species (EPS) Licence is required for this development and the LPA should include a planning condition about contaminated land if permission is granted. <u>Neath Porth Talbot Council – The Highway/Drainage Authority</u> A response was received by email on 20 December 2022.

	No objection has been raised to the development at this location, but some amendments were requested to make the proposals fully compliant with the relevant guidance and legislation. The matters highlighted in the response are visibility splays, parking arrangements, width of footpaths and roadway; and swept path analysis. <u>The Coal Authority</u> A response was received by email on 13 December 2022. It was confirmed that there are coal mining features and hazards which need to be considered in relation to the determination of any subsequent planning application. The 'Geo-Environmental and Geotechnical Assessment' (August 2021, prepared by Earth Science Partnership) submitted with this PAC was deemed satisfactory. Therefore, no objection was raised regarding the proposals subject to the imposition of a planning condition to ensure the completion of any necessary remedial/mitigatory measures.
Applicant's Response to Consultation	
Local Residents/ the Public and Community Consultees	<u>Local Residents and Community Consultees</u> The purpose of the consultation was to gain an insight into the thoughts of local residents in respect of the proposed development, to ensure that due regard was given to these views in bringing any development forward. One of the residents sought clarification about the proposed location of the site access. Amity Planning provided a response to this query by email, confirming that the existing access from Dwr-Y-Felin Road was the proposed main way of accessing the site for all road users; that a new footpath was also proposed to link the site with Heol Illtyd; and referring the resident to the Transport Statement published on Amity Planning's website as part of the PAC Consultation for more information. One further resident and Blaenhonddan Community Council objected the demolition of Caewern House. Whilst this objection is noted, the possibility of retaining the building, both in totality and in part, have been fully explored by the applicant as part of the development of the scheme but, unfortunately, is not viable. This is evidenced in some detail as part of the Planning Statement which accompanies the planning application. It is further noted that the building has no heritage designation. One further resident raised concerns on a wide range of topics which are dealt with in detail below: • <i>Further social housing in a heavily social affordable dense area</i> The latest published Annual Monitoring Report (October 2023) evidences that just 72 affordable housing units have been delivered in NPT since the LDP base date, compared to a cumulative target of 935 affordable dwellings. This represents a shortfall of 863 affordable housing units across the authority area. The AMR provides no specific data on a settlement by settlement basis, however Neath is classified as urban town and one of the County Borough's most sustainable settlements, and so would have been expected to accommodate a large proportion of these units. There is therefore a clearly evidenced need for affordable housing. • <i>Cumulative impact upon the existing high volumes of traffic and congestion in Dwr y Felin Road and poor highway safety especially for children and young people that walk to the education centres nearby</i> Neath Porth Talbot Council as Highway Authority has been consulted and no objection has been made to the proposals in terms of highway capacity. The application is supported by a detailed Transport Statement which evidences the impact of the development on highway capacity and further includes information on visibility splays, parking arrangements, width of footpaths and roadway, and swept path analysis which demonstrates that the re-development will not undermine highway safety.

	<i>The three-storey nature of the development would be overbearing</i> The scale and height of Caewern House is significant in comparison with most of the properties to east and west. The proposed blocks of flat would not significantly differ from that. The scheme has been carefully developed to ensure that the proposed development would not have a detrimental impact on the amenity of neighbouring residents by way of overbearing, overlooking or loss of light. <i>Trees and biodiversity will be undermined by the proposals</i> Good quality trees on site are being retained where possible and, where trees are required to be removed in order to facilitate the site's redevelopment, these are being mitigated for with replacement planting on a 3 for 1 basis as required by PPW. This is evidenced on the Tree Survey and Landscaping Proposals which accompany the application. With regard to ecology, the application is accompanied by both a Preliminary Ecological Appraisal and Bat Survey Report which evidence that Caewern House itself is used as bat roost, and propose mitigation measures in response to this. NRW have reviewed the reports and are satisfied that bats would not be adversely impacted by the development, subject to implementation of the identified mitigation. Furthermore, subject to compliance with the mitigation identified in the reports, no other ecological features would be adversely impacted by the development. <i>Further pressure on the demand of local services which are already insufficient</i> A proposed development of 36 affordable units would not have an adverse impact on local services, not least because future residents of the development would be selected from the local housing register and so would already be resident in the area.
Specialist Consultees	<u>Natural Resources Wales (NRW)</u> NRW's comments are noted and welcomed. <u>Neath Porth Talbot Council – The Highway/Drainage Authority</u> The Highway/Drainage Authority's comments are noted. The application proposals have been evolved subsequent to those presented for PAC Consultation, in part in response to these comments. <u>The Coal Authority</u> The Coal Authority's comments are noted and welcomed.
Conclusion	
	This Pre-Application Consultation Report has been prepared on behalf of Linc Cymru to accompany a full planning application for demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works at Caewern House, Dwr-Y-Felin Road, Neath. This Report is a statutory requirement and addresses all matters required by article 1 of the Town and Country Planning (Development Management Procedure)(Wales)(Amendment) Order 2016. It has been demonstrated herein that the applicant has undertaken all measures necessary to comply with the guidance. Alongside the planning application, this report demonstrates that the issues raised by the consultees have either been addressed as part of the planning application or are justified in planning terms.

Appendix 1: Site Location Plan



Appendix 2: Location of Site Notices and Extent of Neighbour Notice Consultation



Appendix 3: Site, Neighbour and Community Notice

SCHEDULE 1B Articles 2C and 2D

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D

(to be served on owners and/or occupiers of adjoining land and community consultees; and displayed by site notice on or near the location of the proposed development)

Purpose of this notice: this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at Caewern House, Dwr-Y-Felin Road, Neath

I give notice that Linc Cymru is intending to apply for planning permission for:

"Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works"

You may inspect copies of:

- the proposed application;
- the plans; and
- other supporting documents

online at www.amityplanning.co.uk/caewern-house or scanning the QR code below.

If you are unable to access the documents electronically you may request copies of this information by emailing info@amityplanning.co.uk or by telephoning the agent acting on behalf of the applicant on **07535 396394** (referring to 'Caewern House').

Anyone who wishes to make representations about this proposed development must write to the agent using the contact details on the above website or via email to info@amityplanning.co.uk by **26 December 2022**.

Signed:



Date: 28 November 2022



ATODLEN 1B Erthyglau 2C a 2D

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO

Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO HYSBYSIAD O DAN ERTHYGLAU 2C a 2D

(i'w gyflwyno i berchnogion a/neu feddianwyr tir cyffiniol ac ymgylgoreion cymunedol; ac i'w arddangos drwy hysbysiad safle ar neu gerllaw lleoliad y datblygiad arfaethedig)

Diben yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau yn uniongyrchol i'r datblygwr ynglŷn â datblygiad arfaethedig cyn cyflwyno cais am ganiatâd cynllunio i'r awdurdod cynllunio lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn lleihau dim ar eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir gennych yn y ffeil gyhoeddus.

Datblygiad arfaethedig yn Caewern House, Dwr-Y-Felin Road, Castell-nedd

Rwyf yn hysbysu bod Linc Cymru yn bwriadu gwneud cais am ganiatâd cynllunio llawn ar gyfer:

"Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works"

Gallwch weld copïau o'r canlynol:

- y cais arfaethedig;
- y planiau; a
- dogfennau ategol eraill

ar-lein yn www.amityplanning.co.uk/caewern-house neu sganio'r cod QR isod.

Os nad ydych yn gallu cael mynediad at y dogfennau yn electronig gallwch ofyn am gopïau o'r wybodaeth hon drwy anfon e-bost at info@amityplanning.co.uk neu drwy ffonio'r ceisydd ar **07535 396394** (yn cyfeirio at gan dir yn 'Caewern House').

Rhaid i unrhyw un sy'n dymuno gwneud sylwadau ynglŷn â'r datblygiad arfaethedig hwn ysgrifennu at y ceisydd/yr asiant drwy ddefnyddio'r manylion cyswllt ar y wefan neu drwy ebost i info@amityplanning.co.uk erbyn **26 Rhagfyr 2022**.

Llofnod:



Dyddiad: 28 Tachwedd 2022



Appendix 4: Photographs of the display of Site Notices



Appendix 5: Letter given to owners/occupiers



Suite 212
Creative Quarter
Cardiff
CF10 1AF

28 November 2022

The Owner and/or Occupier

Dear Sir/ Madam,

Statutory Pre-Application Consultation for development at Caewern House, Dwr-Y-Felin Road, Neath

I am pleased to enclose on behalf of Linc Cymru a pre-application notice in respect of proposed development at Caewern House, Dwr-Y-Felin Road, Neath, for:

“Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works”

The enclosed notice provides details of how to view and comment on the proposed development in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Please note that any comments should be received no later than **26 December 2022**.

Please note that any comments made will be summarised in a report for inclusion in the planning application.

Yours faithfully

Joan Isus
for Amity Planning

Os oes angen copi o'r llythyr hwn yn Gymraeg, cysylltwch â'r swyddfa ar y manylion isod.

Joan

From: Elene
Sent: 01 December 2022 09:36
To: kylegorman3@gmail.com
Cc: Joan; Jon
Subject: RE: Caewern house
Attachments: 161122_22-379-20 - Transport Statement_v00.pdf

Good morning Kyle,

Thank you for your email. The access for cars is proposed via an upgraded and relocated private access road which will join Dwr-Y-Felin Road. This has been designed to avoid intensification of the residential streets of Heol-Illyd, Heol-Y-Wern and Llgad-Yr-Haul. There are however arrangements to create a footpath from the Site to link with Heol-Illyd Road.

I have attached the Transport Statement for the proposal to this email if you would like to read about the access arrangements in more detail, or see some images depicting the new access. This document is also available to view online amongst a full set of plans and other supporting documents with this link - [Caewern House \(amityplanning.co.uk\)](https://caewernhouse.amityplanning.co.uk).

If you have any further queries, please get in touch.

Kind regards,
Elene



Elene Gegeshidze
Planner

☎ 07498 915610
✉ elene@amityplanning.co.uk

Suite 212, Creative Quarter, Cardiff. CF10 1AF

From: Amity Planning <info@amityplanning.co.uk>
Sent: 30 November 2022 19:38
To: Elene <Elene@amityplanning.co.uk>
Cc: Joan <Joan@amityplanning.co.uk>; Jon <jon@amityplanning.co.uk>
Subject: Fwd: Caewern house

Sent from [Outlook for iOS](#)

From: [REDACTED]
Sent: Wednesday, November 30, 2022 4:40:42 PM
To: Amity Planning <info@amityplanning.co.uk>
Subject: Caewern house

Hi just seem the plans is this going to affect heol Illtyd in anyway as to entrance or exit or is the entrance and exit going to be from ten teg

[REDACTED]

Sir / Madam

In answer to the letter we were left stating that

CAEUERAN HOUSE DWR-Y-FELIN Road was to be demolished.

I think this is disgusting that a lovely old building should be demolished as there are a lot of buildings put up with are so ugly

Who decides these building demolition I wonder. As the new bus is like hegolando Dr in the building not in keeping with 2022. I know you don't listen to people's views. But it's a disgrace in my opinion.

[REDACTED]

Joan

From: Amity Planning
Sent: 27 December 2022 11:11
To: Jon; Joan; Elene
Subject: Fwd: Redevelopment of Caewern house

Sent from [Outlook for iOS](#)

From: [REDACTED]
Sent: Monday, December 26, 2022 6:25:04 PM
To: Amity Planning <info@amityplanning.co.uk>
Subject: Redevelopment of Caewern house

Dear Amity planning,

I wish to object to the redevelopment at Caewern house for the following reasons

1. The area of Waunceirch and Caewern already has an over abundance of social housing with the area being dominated by estates run by Coastal housing, Tai Tarian and Swansea Housing.
2. The town of Neath has an over abundance of Flats for social housing
3. The proposed entrance to the development is off a very dangerous and HEAVILY CONGESTED road I. E. Dwr y Felin Road and additional traffic going in and out of this proposed estate will cause additional and unacceptable congestion. It is a road which is used heavily by children and young people walking to and from a large comprehensive school and college and additional vehicles will cause this road to become even more dangerous than it is already is.
4. The three story proposed building will be overbearing and an eyesore (having visited the Linc buildings in Micna Street Port Talbot it can be seen that this is an ugly building and the plans for the Caewern development appear to be a carbon copy of the buildings at Micna street).
5. The current undeveloped site is a haven for biodiversity and bats roosts exist there. Biodiversity will be harmed by the development. Many trees and habitat have already been removed which I find unacceptable at a time when the Welsh Government has declared a climate and nature emergency.
6. In the last five years there has been building on three green spaces in Caewern for housing.
7. There is currently a lack of services and infrastructure in the area such as Doctors surgeries, pharmacy and dentists and will not support additional housing.

In summary yet another housing development will lead to over congestion, make Dwr y Felin Road an danger and additional pressure on already stretched services as well as destruction of habitat for wildlife.

[REDACTED]

Sent from my iPhone

Appendix 6: Community Consultee Letter and Responses



Suite 212
Creative Quarter
Cardiff
CF10 1AF

28 November 2022

Councillor Jo Hale

By email – cllr.j.hale@npt.gov.uk

Dear Cllr. Jo Hale,

Statutory Pre-Application Consultation for development at Caewern House, Dwr-Y-Felin Road, Neath

I am pleased to enclose on behalf of Linc Cymru a pre-application notice in respect of proposed development at Caewern House, Dwr-Y-Felin Road, Neath, for:

"Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works"

The enclosed notice provides details of how to view and comment on the proposed development in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Please note that any comments should be received no later than **26 December 2022**.

Please note that any comments made will be summarised in a report for inclusion in the planning application.

Yours sincerely

A handwritten signature in black ink, appearing to be "Joan Isus". The signature is stylized with a large, looped initial 'J' and a long, horizontal stroke at the end.

Joan Isus
for Amity Planning

Os oes angen copi o'r llythyr hwn yn Gymraeg, cysylltwch â'r swyddfa ar y manylion isod.



Suite 212
Creative Quarter
Cardiff
CF10 1AF

28 November 2022

Councillor Chris Williams

By email – cllr.c.williams@npt.gov.uk

Dear Cllr. Chris Williams,

Statutory Pre-Application Consultation for development at Caewern House, Dwr-Y-Felin Road, Neath

I am pleased to enclose on behalf of Linc Cymru a pre-application notice in respect of proposed development at Caewern House, Dwr-Y-Felin Road, Neath, for:

“Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works”

The enclosed notice provides details of how to view and comment on the proposed development in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Please note that any comments should be received no later than **26 December 2022**.

Please note that any comments made will be summarised in a report for inclusion in the planning application.

Yours sincerely

Joan Isus
for Amity Planning

Os oes angen copi o'r llythyr hwn yn Gymraeg, cysylltwch â'r swyddfa ar y manylion isod.



Suite 212
Creative Quarter
Cardiff
CF10 1AF

28 November 2022

Blaenhonddan Community Council

By email – clerk@blaenhonddan-wcc.gov.uk

Dear Mr. Lanchbury,

Statutory Pre-Application Consultation for development at Caewern House, Dwr-Y-Felin Road, Neath

I am pleased to enclose on behalf of Linc Cymru a pre-application notice in respect of proposed development at at Caewern House, Dwr-Y-Felin Road, Neath, for:

"Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works"

The enclosed notice provides details of how to view and comment on the proposed development in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Please note that any comments should be received no later than **26 December 2022**.

Please note that any comments made will be summarised in a report for inclusion in the planning application.

Yours sincerely

Joan Isus
for Amity Planning

Os oes angen copi o'r llythyr hwn yn Gymraeg, cysylltwch â'r swyddfa ar y manylion isod.

Joan

From: Jon
Sent: 14 December 2022 16:33
To: Elene; Joan
Subject: FW: Caewern House, Neath



Jon Wilks
Director

☎ 07584 089182
✉ jon@amityplanning.co.uk

Suite 212, Creative Quarter, Cardiff. CF10 1AF

From: Clerk Blaenhonddancc <clerk@blaenhonddan-wcc.gov.uk>
Sent: 14 December 2022 12:48
To: Jon <jon@amityplanning.co.uk>
Subject: RE: Caewern House, Neath

Dear Mr Wilks

Your letter and pre-application notice in respect of Caewern House was considered by my Council on Monday 12 December 2022. Council resolved that it should forward its observations to you in the following terms. Redevelopment of the site is supported by the Council, although it is disappointed that the building needs to be demolished. Council is concerned that the development will increase pressure on local services and the highway infrastructure which is already under pressure. Accordingly, whilst supporting the redevelopment, Council would encourage you to revisit the proposals to increase the quantity of, for example, sheltered and single person accommodation that would generate less traffic and place reduced demand on local services.

I hope that you can explore this and put the revised proposals in place before submitting a formal application.

Rowland Lanchbury

Rowland Lanchbury
Clerc y Cyngor / Clerk to the Council
Cyngor Cymuned BLAENHONDDAN Community Council
t – 01639 632436
m – 07873 129744
e – clerk@blaenhonddan-wcc.gov.uk

From: Jon <jon@amityplanning.co.uk>
Sent: 28 November 2022 16:29

Appendix 7: Specialist Consultee Notice, Letters and Responses

SCHEDULE 1C Article 2D

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLE 2D

(to be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012)

Purpose of this notice: this notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development at Caewern House, Dwr-Y-Felin Road, Neath

I give notice that Linc Cymru is intending to apply for planning permission for:

“Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works”

You may inspect copies of:

- the proposed application;
- the plans; and
- other supporting documents

online at www.amityplanning.co.uk/caewern-house or scanning the QR code below.

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to the email address info@amityplanning.co.uk by **26 December 2022**.

Signed:



Date: 28 November 2022





Suite 212
Creative Quarter
Cardiff
CF10 1AF

28th November 2022

Dŵr Cymru – Welsh Water

By email – developer.services@dwrcymru.com

Dear Sir/Madam,

Statutory Pre-Application Consultation for development at Caewern House, Dwr-Y-Felin Road, Neath

I am pleased to enclose on behalf of Lincs Cymru a pre-application notice in respect of proposed development at Caewern House, Dwr-Y-Felin Road, Neath, for:

“Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works”

The notice represents a formal request for a pre-application consultation response from a specialist consultee under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

The notice provides details of how to view and comment on the proposed development in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Please note that any comments should be received no later than **26th December 2022**.

Yours faithfully

Joan Isus
for Amity Planning

Os oes angen copi o'r llythyr hwn yn Gymraeg, cysylltwch â'r swyddfa ar y manylion isod.



Suite 212
Creative Quarter
Cardiff
CF10 1AF

28th November 2022

Natural Resource Wales

By email – swplanning@cyfoethnaturiolcymru.gov.uk

Dear Sir/Madam,

Statutory Pre-Application Consultation for development at Caewern House, Dwr-Y-Felin Road, Neath

I am pleased to enclose on behalf of Lincs Cymru a pre-application notice in respect of proposed development at Caewern House, Dwr-Y-Felin Road, Neath, for:

“Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works”

The notice represents a formal request for a pre-application consultation response from a specialist consultee under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

The notice provides details of how to view and comment on the proposed development in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Please note that any comments should be received no later than **26th December 2022**.

Yours faithfully

Joan Isus
for Amity Planning

Os oes angen copi o'r llythyr hwn yn Gymraeg, cysylltwch â'r swyddfa ar y manylion isod.



Ein cyf/Our ref: CAS-204253-S6G4
Eich cyf/Your ref: Dŵr Y Felin Road

Maes Newydd,
Llandarcy,
Neath Port Talbot,
SA10 6JQ

Amity Planning Consultants
Suite 212
Creative Quarter
Cardiff
CF10 1AF

ebost/email:
swplanning@cyfoethnaturiolcymru.gov.uk

23/12/2022

Annwyl Syr/Madam / Dear Sir/Madam,

STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.

BWRIAD / PROPOSAL: DEMOLITION OF CAEWERN HOUSE AND ASSOCIATED STRUCTURES; CONSTRUCTION OF RESIDENTIAL APARTMENTS TOGETHER WITH ASSOCIATED ROAD AND PARKING, DRAINAGE, LANDSCAPING, AND OTHER INFRASTRUCTURE WORKS

LLEOLIAD / LOCATION: CAEWERN HOUSE, DWR-Y-FELIN ROAD, NEATH

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 28th November 2022.

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding bats, a European protected species. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

We also advise that based on the information submitted to date, we would ask the planning authority to include a condition regarding land contamination on any planning permission granted. Without the inclusion of this condition by the planning authority we would be likely to object to the planning application.

European Protected Species: Bats

From the tree survey, we note that several trees on site require felling/works to facilitate the development, therefore, a preliminary bat roost inspection should be undertaken to assess their potential to support roosting bats. For any trees categorised as having

moderate to high potential for supporting bats, further surveys (climbing inspections and/or activity surveys) will be required in accordance with best practice. A detailed plan should be included with the submission which outlines which trees require felling/ pruning, and their potential to support roosting bats.

We have reviewed the supporting bat report (*'Bat Survey Report for Linc-Cymru Housing – Caewern House, Dŵr Y Felin Road, Caewern, Neath, Neath Port Talbot, SA10 7RH'* by I & G Ecological Consulting, dated 17/11/2022, report reference: IG2022CaewernHouse) which has identified that bats are present at the application site.

Bats and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

- i. the development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.
- ii. There is no satisfactory alternative and
- iii. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning (TAN5) states that your Authority should not grant planning permission without having satisfied itself that the proposed development either would not impact adversely on any bats on the site or that, in its opinion, all three conditions for the eventual grant of a licence are likely to be satisfied. Please note, for the purposes of providing advice at the planning application stage, our comments are limited to compliance with the third test only.

Based on the above report, we do not consider that the development is likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Therefore, we do not object to the proposal but in line with the 'Dear CPO' letter issued by Welsh Government on 1st March 2018, we request that the following informative is attached to any planning permission granted by your Authority:

Warning: A European protected species (EPS) Licence is required for this development.

This planning permission does not provide consent to undertake works that require an EPS licence.

It is an offence to deliberately capture, kill or disturb EPS or to damage or destroy their breeding sites or resting places. If found guilty of any offences, you could be sent to prison for up to 6 months and/or receive an unlimited fine.

To undertake the works within the law, you can obtain further information on the need for a licence from Natural Resources Wales on 0300 065 3000 or at <https://naturalresources.wales/permits-and-permissions/species-licensing/when-you-need-to-apply-for-a-protected-species-licence/?lang=en>.

Development should not be commenced until the Applicant has been granted a licence by Natural Resources Wales pursuant to Regulation 55 of the Conservation of Habitats and Species Regulations (2017) authorising the specified activity/development to go ahead.

Please note that any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Contaminated Land

We have reviewed the submitted report (*'Former Caewern Care Home, Neath – Geo-Environmental and Geotechnical Assessment'* by Earth Science Partnership, dated August 2021, Report Reference: ESP.7828b.3558 (Draft)) and note that the risk to groundwater is low. We agree with this conclusion and request that the following condition is imposed on any planning permission granted.

Condition 1

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Reason

To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

Advice for the Developer

Culverted Watercourse

From our mapping system there appears to be a culverted watercourse which traverses the site. It is extremely poor practice to erect any structure over, or close to a culvert as any failings in the integrity of the culvert may result in damage to the built structure. As this is an ordinary watercourse, we advise that you liaise with the Lead Local Flood Authority, which in this case is Neath Port Talbot Local Authority, who should hold detailed information on the culvert.

Ground Stabilisation by Grouting

We note the proposed use of grout to stabilise the ground from old mine working. Depending on the type of grout used on site, an Environmental Permit may be required – please contact our Permitting team for more advice and permit application requirements.

The information below is provided as advice regarding the use of grout.

1. Vulnerability Survey

Identify all surface and groundwater features and users in the vicinity of the site including old or existing mine adits and mine-workings, drains and culverted features. In addition, all relevant historic documents held by the appropriate local planning authority should be used to identify any natural or man-made structures beneath or in the vicinity of the site.

It is important for a walk-over survey to be carried out to validate the vulnerability survey and identify any features not included in the formal records, i.e., disused adits or mine-workings etc.

To notify abstractors in case of grout break-out licensed surface water abstractions and private water supplies downstream of a site need to be identified. For a main river this would typically be a few km's; NRW can supply this information.

2. Procedure

- Location of the area to be grouted.
- Check area against vulnerability survey and historic land-use records.
- Nature of any structures to be grouted, cavities in the sub-strata, mine-workings etc.
- Is grouting to take place above or below the water table?

- Method of grout injection, i.e., as part of an inner/outer "curtain" or individual injection boreholes etc.
- Type of grout to be used, i.e., ratio of cement, water, other material (e.g., PFA) - this should take into consideration whether grouting is to take place above or below water table.
- Thixotropy of the grout, i.e., how far will the grout extend into the cavity when injected. Again, this should take into consideration whether the works are above or below water table.
- Duration of grouting works.
- How much grout is to be injected into both individual points and as a total quantity.

3. Monitoring

- Identification of sites grouting material could emerge, i.e., adits/drains into water courses etc.
- Proposals for monitoring such features during the work, i.e., which ones, frequency of monitoring.
- Confirm details of monitoring with Natural Resources Wales local Environmental Protection Officer prior to the commencement of workings.
- Agree suitable mitigation measures with the local Environmental Protection Officer should any impact on any feature occur during to the workings.

4. Management

- Keep daily records of the following:
- Review previous days grouting operations (where grouted, how much grout used etc).
- Location of areas to be grouted.
- Boreholes used for grouting.
- Times of injection into each borehole.
- Quantities of grout to be injected into each borehole (both projected and actual).
- Records if quantity of grout "lost" in a borehole.
- Pressure used in grouting at a borehole.
- Type of grout used.
- Review of monitoring.
- Details of any breakouts of any grout.
- Details of any clean-up of grout at monitoring sites.
- Reporting of information needs to be agreed with NRW prior to the commencement of workings.
- In cases of an unpredicted loss of grout, emergency procedures should be agreed with NRW to include an increase in the frequency of monitoring of any identified surface water features.
- Notification of the local Environmental Protection Officer should either any outbreak or an unpredicted loss of grout occurs.
- Notification of identified downstream surface water abstractors in the event of an emergency, i.e., if there was any outbreak of grout into a surface watercourse.

Waste

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the [*CL:AIRE Definition of Waste: Development Industry Code of Practice*](#). This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

Pollution Prevention

Construction and demolition activities can give rise to pollution and so it is important that appropriate provisions are in place to manage dust, silt, surface water and the storage of waste during the construction phase. You should take any precaution to prevent contamination of surface water drains and local watercourses. All works at the site must be carried out in accordance with GPP5, 'Works and maintenance in or near water' and PPG6, 'Working at construction and demolition sites' which is available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

A Fracchiolla

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales

Joan

From: SW Planning <swplanning@cyfoethnaturiolcymru.gov.uk>
Sent: 11 January 2023 13:15
To: Jon; SW Planning
Cc: Joan; Elene
Subject: RE: Dwr Y Felin Road - Caewern House NEATH (Stat Pre-app) - NRW Response NRW:08690842

Good afternoon,

Thank you for your email.

Apologies for any confusion caused by the comments within our previous response. To clarify, we have no objection to the proposal in respect of the demolition of the existing building. An EPS licence is required, and this is detailed in the informative within our previous response.

To confirm, the additional information required is in relation to bats and any proposed felling of trees on site. This has been repeated below for your convenience:

"From the tree survey, we note that several trees on site require felling/works to facilitate the development, therefore, a preliminary bat roost inspection should be undertaken to assess their potential to support roosting bats. For any trees categorised as having moderate to high potential for supporting bats, further surveys (climbing inspections and/or activity surveys) will be required in accordance with best practice. A detailed plan should be included with the submission which outlines which trees require felling/ pruning, and their potential to support roosting bats".

I hope this clarifies our position. However, if you have any further questions, please don't hesitate to contact me.

Kind regards,

A Fracchiolla

A Fracchiolla
Tîm Cynllunio Datblygu / Development Planning Team
Cyfoeth Naturiol Cymru / Natural Resources Wales

www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

----- Original Message -----

From: Jon Wilks <jon@amityplanning.co.uk>;
Received: Tue Jan 03 2023 17:21:35 GMT+0000 (Greenwich Mean Time)
To: Swplanning <swplanning@cyfoethnaturiolcymru.gov.uk>; South West Planning MailBox Queue <swplanning@cyfoethnaturiolcymru.gov.uk>;
Cc: Joan <jon@amityplanning.co.uk>; Elene <elene@amityplanning.co.uk>;

Subject: RE: Dwr Y Felin Road - Caewern House NEATH (Stat Pre-app) - NRW Response
NRW:08690842

Dear A Fracchiolla

Thank you for your consultation response to the above PAC Consultation received 23/12/22. I would be grateful if you could provide further clarification on content of your response in respect of bats.

In the first paragraph of your response, you advise:

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding bats, a European protected species. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

However you then go on to advise that you have reviewed the bat survey report, and that based on this, you “do not consider that the development is likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.” You conclude that you would offer no objection to the proposal but would seek the imposition of an informative.

Could you therefore please clarify what additional information is being sought to support a planning application, or alternatively confirm whether the opening paragraph was included in error?

Kind regards



Jon Wilks
Director

☎ 07584 089182

✉ jon@amityplanning.co.uk

Suite 212, Creative Quarter, Cardiff. CF10 1AF

From: Amity Planning <info@amityplanning.co.uk>

Sent: 23 December 2022 21:49

To: Jon <jon@amityplanning.co.uk>; Elene <Elene@amityplanning.co.uk>; Joan <Joan@amityplanning.co.uk>

Subject: Fwd: Dwr Y Felin Road - Caewern House NEATH (Stat Pre-app) - NRW Response NRW:08690842

Sent from [Outlook for iOS](#)

From: SW Planning <swplanning@cyfoethnaturiolcymru.gov.uk>

Sent: Friday, December 23, 2022 16:05

To: Amity Planning <info@amityplanning.co.uk>

Subject: Dwr Y Felin Road - Caewern House NEATH (Stat Pre-app) - NRW Response NRW:08690842

Good afternoon,

Please find attached our response to the above application, if you have any queries please do not hesitate to contact me.

Kind Regards

A Fracchiolla

Tim Cynllunio Datblygu / Development Planning Team

Cyfoeth Naturiol Cymru / Natural Resources Wales

www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



Suite 212
Creative Quarter
Cardiff
CF10 1AF

28th November 2022

Neath Port Talbot Council – Highway Development Control

By email – hdc@npt.gov.uk

Dear Sir/Madam,

Statutory Pre-Application Consultation for development at Caewern House, Dwr-Y-Felin Road, Neath

I am pleased to enclose on behalf of Lincs Cymru a pre-application notice in respect of proposed development at Caewern House, Dwr-Y-Felin Road, Neath, for:

“Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works”

The notice represents a formal request for a pre-application consultation response from a specialist consultee under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

The notice provides details of how to view and comment on the proposed development in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Please note that any comments should be received no later than **26th December 2022**.

Yours faithfully

Joan Isus
for Amity Planning

Os oes angen copi o'r llythyr hwn yn Gymraeg, cysylltwch â'r swyddfa ar y manylion isod.

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

The Town and Country Planning (Development Management Procedure)
(Wales) Order 2015 (as amended)

HEAD OF ENGINEERING & TRANSPORT

OBSERVATIONS

PAC APPLICATION NO: N/3/22/0014/00
APPLICANT: JON WILKS - AMITY PLANNING
LOCATION: CAEWERN HOUSE, DWR Y FELIN ROAD, CAEWERN,
NEATH, NEATH PORT TALBOT, SA10 7RH
PROPOSAL: DEMOLITION OF CAEWERN HOUSE & ASSOCIATED
STRUCTURES; CONSTRUCTION OF RESIDENTIAL
APARTMENTS TOGETHER WITH ASSOCIATED
ROAD & PARKING, DRAINAGE, LANDSCAPING, &
OTHER INFRASTRUCTURE WORKS

The Highway/Drainage Authority, in responding to the above application, provides the following substantive response:

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐
SAB (SAB approval is required)	☒

MY OBSERVATIONS ON THIS PAC ARE AS FOLLOWS:-

No Objection in principle to development at this location, however the following items of concern need addressing and is subject to any subsequent planning application submission being compliant with the following documents and inclusive of the guidance conditions below:-

- Neath Port Talbot County Borough Council - Parking Standards (Oct 2016).
- Neath Port Talbot County Borough Council - Design Guide for Streets and Public Realm for Residential and Commercial Developments.
- Planning Policy Wales Technical Advice Note 18: Transport
- Schedule 3 of the Flood and Water Management Act (FWMA) 2010 requires surface water drainage for new developments to comply with Mandatory National Standards for Sustainable Drainage (SuDS). Reference to the Non-Statutory Ministerial National Standards and the CIRIA 753: The SuDS Manual is recommended.
- Welsh Government's Active Travel Guidance

Highways

1. It is noted that the car parking provision in terms of number of spaces is not in accordance with NPTCBC Parking Standards. I would request the following alterations are made:
 - a. Parking shall be provided at a ratio of 1 space per bedroom, to a maximum of 3 per dwelling.
 - b. Provision shall be made within the development for safe and secure on-street visitor parking at a rate of one space per five dwellings which shall be clearly shown on the submitted site layouts.
 - c. Spaces should be a minimum of 2.6 x 4.8.
2. Vision splays of 2.4m by 43m onto the existing public highway known as Dwr Y Felin Road must be achieved and within which nothing over 600mm in height shall be erected or allowed to grow and shall be retained as such thereafter. It is noted that the bus stop is highlighted within the current visibility splays this will need to be relocated alongside any other street furniture that is within the splay areas.
3. Within the Transport statement provided it is stated that 8 cycle storage spaces should be included, these are to be included on the site layout.
4. Active travel has been considered with the development maximising walking as a pedestrian route is included to connect with an existing active travel link. If the existing active travel link is to include cycles then this would need to be extended to 3m wide.
5. In accordance with active travel, the footpaths must be 2m in width. In addition to the current plans, a new tactile crossing will be required at the end of the footpath to cross Dwr Y Felin Road, this is due to the desire line of pedestrians to take the shortest route.
6. Footways shall be 2m wide and be on both sides of the street. This would be required from the connection with the existing footpath at the south-west of site, linking with the buildings to the north.
7. The carriageway width at the entrance to the development is currently drawn as 5m width, this should be increased to at least 5.5m.
8. The entrance road is of 80m before the first parking bay, this is in excess of the required 60m maximum of unrestrained highway in a residential area. Speed control will be achieved by a variety of measures such as, narrowing of carriageway or chicanes.
9. Waste should not be carried more than 25m, for blocks 31-36 this would be exceeded as this is measured following the footway.
10. The size of the vehicle used within the provided swept path analysis is incorrect. This should be re-run with the vehicle size increased, with the dimensions of a Phoenix 2 Duo Recycler (P2-15W with Elite 6x4 chassis) used.

11. All works to be constructed on the public highway shall be subject to Road safety Audits, stages 1 to 4 in accordance with GG 119 of the Design Manual for Roads and Bridges. Each stage of the Road safety Audit shall be submitted for approval in writing by the Local planning Authority. All issues highlighted at each stage, being addressed to the written approval of the Local Planning Authority within 3 months of that stage of that Road safety Audit has been approved.
12. A Construction Method Statement needs to be submitted to and approved before the development commences. The approved Statement shall be adhered to throughout the construction period. The statement shall provide for:
- a. **Construction methods:** details of the extent and phasing of development; details for the storage and management of plant and materials used in constructing the development
 - b. **Drainage:** Details of drainage measures during construction phases to ensure that the drainage of any adjoining land, and land downstream is not interrupted or otherwise adversely affected by the development.
 - c. **General Site Management:** details of the construction programme including timetable; details of site clearance; details for erection and maintenance of security hoarding including decorative displays and facilities for public viewing.
 - d. **Control of Nuisances:** Wheel washing facilities and measures to control light spill.
 - e. **Traffic Management:** details of site deliveries including routes of vehicles, plus delivery and construction times, taking into account the proximity of residential dwellings and school opposite, there shall be no deliveries in excess of 3.5 tonnes shall access or leave the site via any route during the hours of 8am to 9.30am and 2.30pm to 4pm during school term times; details for the loading and unloading of plant and materials; details for the parking of vehicles of site operatives and visitors; scheme for the erection of temporary/semi-temporary signage warning drivers of the presence of children and speed restrictions; Measures to prevent stacking of vehicles onto the public highway; The frequency and size of vehicles used to transport the waste material arising from the demolition works;
 - f. **Hours of working on site,** including specified hours for deliveries; details of restrictions to be applied during construction and demolition works (including timing, duration and frequency of works) to prevent noise or nuisance amenity issues to surrounding properties.
 - g. **Responsible Persons:** details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details, the CEMP must also be signed by the responsible person.

Transport Statement

13. Section 2.2.2 states a 5m carriageway has been proposed which is below that of the width of a residential street, in addition 2.4.1 states that cyclists will be able to access the site via this 5m wide access road – have the Active Travel department given comment on this proposal to have cyclists within a shared

5m wide carriageway which would give a lane width of 2.5m for both vehicles and cyclists?

14. Section 2.6.2 Parking allocation is 1 space per bedroom, any provision of visitor parking at a rate of 1 space per 5 dwellings must be provided in addition to that of the residential requirement. The proposed total of 38 combined residential and visitor spaces does not comply.
15. Section 2.7.2 There are concerns that the existing bus shelter will be located within the visibility splay, this will need to be re-located accordingly.
16. The size of the vehicle used within the provided swept path analysis is incorrect. This should be re-run with the vehicle size increased, with the dimensions of a Phoenix 2 Duo Recycler (P2-15W with Elite 6x4 chassis) used.

Drainage

17. SAB approval will be required prior to any work commencing. To commence work is a breach of SAB approval required under Paragraph 7 (1) Schedule 3 of the Flood and Water Management Act 2010 whereby legal action will be taken by the Authority under The Sustainable Drainage (Enforcement) (Wales) Order 2018. Guidance and applications can be found on www.npt.gov.uk/sab

It is noted that a SAB pre-application has been submitted and is currently under review.

18. Should any springs or ground water seepage be encountered the on site works in that area shall cease until a scheme for collection and disposal of the water has been submitted to and approved in writing by the Local Planning Authority. No ground water shall ever be discharged into the proposed drainage scheme.
19. There must be no interference, alteration or diversion of any ditch, watercourse, stream or culvert crossing or bordering the site, without prior consultation and agreement with the Authority.
20. Unless otherwise agreed in writing by the Local Planning Authority, foul water and surface water discharges shall be drained separately from the site.
21. No surface water or Land drainage run-off shall be allowed to connect, either directly or indirectly, to the public sewerage system unless otherwise approved in writing by the Local Planning Authority.
22. Adequate provision shall be made for the drainage of the site, to ensure that the drainage of any adjoining land is not interrupted or otherwise adversely effected by the development during the life time of construction.

NOTES TO APPLICANT

Active Travel

1. Development proposals must seek to maximise walking and cycling accessibility by prioritising the provision of appropriate on-site infrastructure and where necessary off-site infrastructure. Walking and cycling infrastructure and services should be prioritised and put in place from the outset, before people have moved in and travel patterns have been established, as per Planning Policy Wales, Edition 11 and Future Wales – the National Plan 2040. All new walking and cycling infrastructure should be built to standards set out in Welsh Government's Active Travel Guidance and off-site infrastructure should link to (where possible) routes on Neath Port Talbot Council's Active Travel Network Map. This shows where walking and cycling routes already exist (Existing Routes) and where upgrades or brand new routes are anticipated for the next 15 years (Future Routes) in built up areas. Further information on the Active Travel Guidance and Neath Port Talbot's Active Travel Network Map can be found here: www.npt.gov.uk/activetravel.

SAB

2. Please note that from 7th January 2019, all new developments of more than 1 house, or where a construction area is of 100m² or more, plus if the SAB authority believe that any redevelopment of land has significant surface water drainage implications. This will require sustainable drainage - built in accordance with mandatory standards for sustainable drainage published by Welsh Ministers - to manage on-site surface water. More information is available in Schedule 3 of the Flood & Water Management Act 2010.

These systems must be approved by the Council's SAB & Highway Development Control Section **before construction work begins**. In this respect it is essential that a developer of any such project gain SAB approval of its surface water drainage alongside any relevant planning permission. **You will not be allowed to start construction until both permissions have been approved.**

If you have not done so already, and your development would not fall into any of the relevant exceptions, you are therefore strongly encouraged to request further advice from the SAB. Involving the SAB Officers in pre-application discussions will allow for SuDS drainage matters (to ensure suitability of proposed SuDS design in line with national standards and adequate site layout) to be considered alongside the assessment of planning merits. There is an additional charge of £250 for this service. This can be as part of any agreed further pre-application submissions with the Planning Authority (recommended) or independently/ direct with the SAB. You are advised, however, that failing to engage in joint pre-application discussions has the potential to lead to delays and, most notably, the potential need to obtain further planning permission should any agreed SuDS design not be compliant with any relevant planning permission. Further details are available at www.npt.gov.uk/sab

Highways

3. Prior to commencing any works on site the applicant will be required to enter into an agreement with the Authority under Section 278 of the Highway Act 1980 to carry out the works upon the existing public highway. You are advised prior to commencing any work on these works to contact the Head of Engineering and Transport Services at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG (FAO Miss Chloe Dyer, telephone number (01639) 685452 or e-mail c.dyer@npt.gov.uk) to agree the specification, enter the agreement and arrange on site inspection of your works.

BT SIGNED:  DATE: 20/12/2022
pp HEAD OF ENGINEERING & TRANSPORT

PAC Ref: N322001400 - CAEWERN HOUSE, DWR Y FELIN ROAD, NEATH



Suite 212
Creative Quarter
Cardiff
CF10 1AF

28th November 2022

The Coal Authority

By email – planningconsultation@coal.gov.uk

Dear Sir/Madam,

Statutory Pre-Application Consultation for development at Caewern House, Dwr-Y-Felin Road, Neath

I am pleased to enclose on behalf of Lincs Cymru a pre-application notice in respect of proposed development at Caewern House, Dwr-Y-Felin Road, Neath, for:

"Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works"

The notice represents a formal request for a pre-application consultation response from a specialist consultee under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

The notice provides details of how to view and comment on the proposed development in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Please note that any comments should be received no later than **26th December 2022**.

Yours faithfully

Joan Isus
for Amity Planning

Os oes angen copi o'r llythyr hwn yn Gymraeg, cysylltwch â'r swyddfa ar y manylion isod.



200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Joan Isus - Amity Planning

[By Email: info@amityplanning.co.uk]

13 December 2022

Dear Joan

PRE-APPLICATION ENQUIRY: PRE-APPLICATION Caewern House Neath

Demolition of Caewern House and associated structures; construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works; Caewern House, Dwr-y-felin Road, Neath

Thank you for your consultation letter of 28 November 2022 seeking the views of the Coal Authority on the above.

The application site falls within the defined Development High Risk Area.

The Coal Authority records indicate that within the application site and surrounding area there are coal mining features and hazards which need to be considered in relation to the determination of this planning application, specifically actual shallow coal mine workings. Whilst our records also indicate the presence of a recorded mine entry (shaft) within 20m of the planning boundary, this does not affect the proposed development layout and can be discounted.

In terms of the submitted Geo-Environmental and Geotechnical Assessment (August 2021, prepared by Earth Science Partnership), which has been informed from appropriate geological and mining information, as well investigations undertaken, my personal opinion is that it would be sufficient to accompany any subsequent future planning application to meet the requirements of National policy.

In terms of the Report's content, the Report confirms risks posed by identified shallow mine workings and that stabilisation works within the proposed building footprints will be required.

On account of the above, the **likely Coal Authority recommendation would be no objections, subject to the imposition of a condition to ensure the completion of any necessary remedial/mitigatory measures.**

I hope this is helpful however please do not hesitate to contact me if you would like to discuss this matter further.

Yours sincerely

Chris MacArthur

Chris MacArthur B.Sc.(Hons), DipTP, MRTPI
Planning Liaison Manager

General Information for the Applicant

Under the Coal Industry Act 1994 any intrusive activities, including initial site investigation boreholes, and/or any subsequent treatment of coal mine workings/coal mine entries for ground stability purposes require the prior written permission of The Coal Authority, since such activities can have serious public health and safety implications. Failure to obtain permission will result in trespass, with the potential for court action. In the event that you are proposing to undertake such work in the Forest of Dean local authority area our permission may not be required; it is recommended that you check with us prior to commencing any works. Application forms for Coal Authority permission and further guidance can be obtained from The Coal Authority's website at:

<https://www.gov.uk/get-a-permit-to-deal-with-a-coal-mine-on-your-property>

Disclaimer

The above consultation response is provided by the Coal Authority as a Statutory Consultee and is based upon the latest available data on the date of the response, and electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The

views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.