

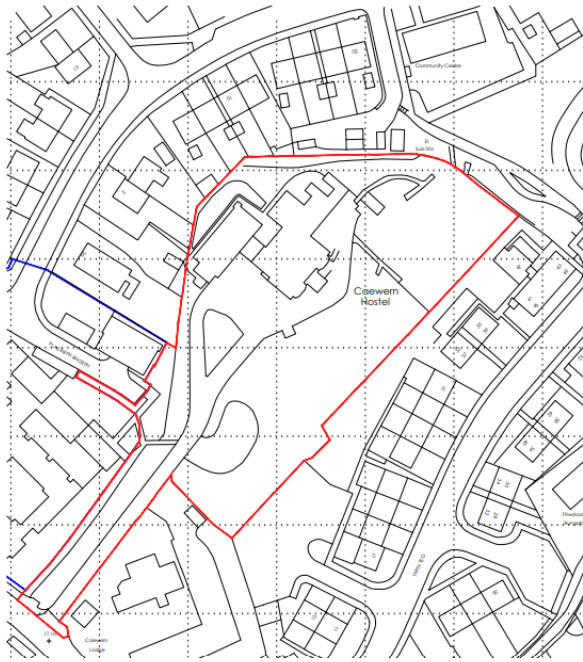
Planning Statement

Land East of Dwyr-y-Felin Road, Caewern
Neath

May 2024

amity
planning consultants



Introduction	
Client	This statement has been prepared on behalf of Linc Cymru
Scope	This statement accompanies the full planning application for proposed Demolition of Caewern House and associated structures; Construction of residential apartments together with associated road and parking, drainage, landscaping, and other infrastructure works.
Site Details	
Site Address	Dwr-y-Felin Road, Caewern, Neath, SA10 7RH.. The National Grid Reference of the site is (SS) 274615 198346.
Site Location	<i>Fig.1 Location Plan</i> 
Site Description	The application site is located to the north-east of Dwr-y-Felin Road in the settlement of Neath Abbey. The site extends to approximately 0.7ha and contains the remains of a large Victorian Villa known as Caewern House, together with an associated access track from Dwr-Y-Felin Road, hardstanding, and a number of trees. Caewern House comprises of a three storey, masonry-built building probably dating from the nineteenth century, with more recent single- and two-storey extensions. Caewern House was last used as a care home, however this use ceased around 2015 and the property has been subsequently vacant and has fallen into ruin following numerous instances of vandalism. The main development site falls steeply from north-west to the south-east, and has been formed into a series of plateaus. The access road also falls from north-east down to towards Dwr-Y-Felin Road to the south-west. The site majority of the site is bounded by residential properties, including houses on Heol Illtyd to the north-west, Twyn Teg Road to the south east, and Caewern Lodge on Dwr-Y-Felin Road to the south. and from the north and east, from properties located on Heol Illtyd Road and Twyn Teg Road.

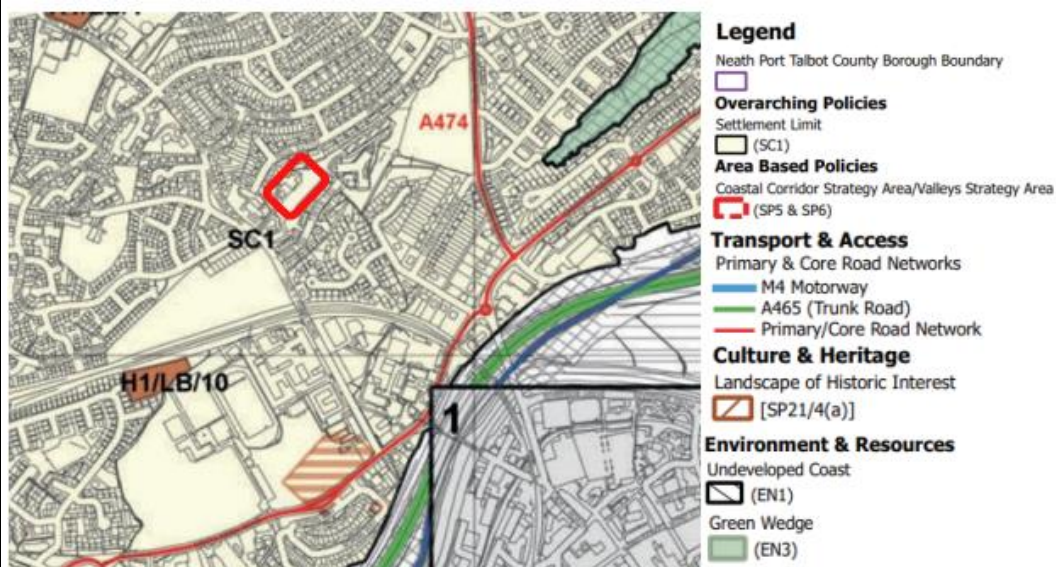
	The driveway off Dwr-y-Felin leads to a small car parking area in front of, and to the side of, the building. A larger, rough surfaced, car parking area is located in the woodland in the southeastern portion. The site has direct links from Dwr-y-Felin Road to the Primary Road Network to the south. Caewern Community Centre lies 100 meters northeast from the site. A number of services and facilities are accessible on foot or by bike from the site, including a Tesco Superstore, Post Office, School, College and Sports Centre. The closest bus stop is just outside of the current access to the site by Dwr-Y-Felin Road. Neath Train Station can also be accessed within 17 minutes walking distance from the site. A Scheduled Ancient Monument “Neath Roman Site” lies to the south, past Dwr-y-Felin Comprehensive School, which is protected under Policy SP21. A designated Green Wedge lies further east from the site (EN3).
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Relevant Planning Policy

Approach	In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the area comprises of the Neath Port Talbot Local Development Plan 2011-2026 (adopted January 2016) together with Future Wales – The National Plan 2040. Relevant material considerations in this instance are identified as including Planning Policy Wales, various Technical Advice Notes, and adopted Supplementary Planning Guidance.
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Local Development Plan	The Neath Port Talbot LDP is the primary planning policy document for the County Borough. It sets out the planning policies and land use allocations that will shape the future of the County Borough area and will guide development management decisions. The LDP replaces the Neath Port Talbot Unitary Development Plan (2008). The LDP has been underpinned by a significant amount of gathered evidence. Whilst some of the information has been gathered from existing sources, a great deal has been established from original research commissioned or carried out by the Council. This information, referred to as the ‘evidence base’, has been used to identify the key issues and challenges facing the County Borough. The Adopted LDP contains the Proposals Map which shows the policy designations across Neath Port Talbot.
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Fig.2 Adopted LDP Proposals Map and the Application Site (in red)



The site is subject to the following designations within the adopted Local Development Plan:

- Within the defined Development Limits of Neath Abbey (Policy SC1)
- Categorised as a “Town” within the Settlement Hierarchy (Policy SP3 - 3.0.11)
- Within the Coastal Corridor Strategy Area (Policy SP5)
- Within a Settlement Protection Zone for Minerals (Policy M1)

The site furthermore has direct links from Dwr-y-Felin Road to the Primary Road Network to the south and a Scheduled Ancient Monument “Neath Roman Site” resides south past Dwr-y-Felin Comprehensive School, which is protected under Policy SP21. A designated Green Wedge lies further east from the site (EN3).

Having reviewed the content of all provisions of the LDP, the following policies have been identified as relevant to the development proposals:

Policy SC1 -Settlement Limits

Policy SC1 advises that development within settlement limits, that is proportionate and of scale and form to the role and function of the Settlement Hierarchy will be acceptable in principle.

Policy SP3 - Sustainable Communities

Policy SP3 seeks to deliver sustainable, healthy and cohesive communities and conserve the countryside by;

1. Defining sustainable communities and locations for development by the identification of a settlement hierarchy that reflects the role and function of settlements.
2. Defining settlement limits within which development which accords with the settlement hierarchy will be permitted in principle.

Neath is categorised as a “Town” within the Policy SP3 Settlement Hierarchy List, which is regarded as the most sustainable location for development. This category regards Neath as a regionally important settlement, providing the widest and most diverse range of functions, which is located on the strategic road network and fully accessible by a range of transport options.

Policy SP5 – Coastal Corridor Strategy Area

In the Coastal Corridor Strategy Area, sustainable growth and development will be promoted to benefit the County Borough as a whole, while protecting and enhancing the area’s character and environment. This will be achieved through the following area-specific measures:

1. Making provision for the majority of new residential development along the coastal corridor.
2. Allocating Strategic Regeneration Areas at Coed Darcy (Neath) and Harbourside (Port Talbot);
5. Promoting mixed use regeneration schemes at Neath Town Centre, Port Talbot Town Centre and Aberafan Seafront;
7. Managing urban form and setting through the designation of Green Wedges
8. Improving public and private transport provision

Policy BE1 Design

All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.

Policy SP7 - Housing Requirement

In order to deliver the 7,800 new dwellings required to meet the economic-led growth strategy, provision will be made for the development of 8,760 additional dwellings between 2011-2026 including a 12.31% flexibility allowance.

	Assumptions	Number of Units
Basic Housing Need (including Vacancy provision)	Preferred Economic Growth Scenario to meet the projected need of 3,850 jobs ⁽¹⁾	7,800
Flexibility Allowance	An allowance for sites not coming forward as anticipated	960
Total Housing Requirement		8,760

In accordance with Policy SP3 Sustainable Communities, Policy SP5 Development in the Coastal Corridor Strategy Area and SP6 Development in the Valleys Strategy Area, the LDP will mainly deliver housing development along the coastal corridor whilst re-invigorating the valley communities through focussed growth within Pontardawe and the Upper Neath Valley (including Glynneath, Resolven and Rheola).

Policy SP8 – Affordable Housing Requirement

Policy SP8 outlines that provision will be made to deliver 1,200 affordable housing units within Neath Port Talbot over the Plan period (2011-2026) through the following measures:

1. Setting thresholds and targets requiring housing developments to contribute to affordable housing provision; and
2. Providing a framework for determining affordable housing exception sites

Policy AH 1 – Affordable Housing

All new housing developments, including conversions, on sites accommodating 3 or more units will be required to contribute to affordable housing provision. Affordable Housing Percentage Targets will be sought in the following spatial areas. Coastal Corridor:

- Neath - 25%

Policy SP15 Biodiversity & Geodiversity

Important habitats, species and sites of geological interest will be protected, conserved, enhanced and managed.

Policy SP16 – Environmental Protection

Air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures:

1. Ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels;
2. Giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable;
3. Ensuring that developments do not increase the number of people exposed to significant levels of pollution.

Policy SP17 – Minerals

Policy SP17 regulates the exploitation of mineral resources. A proportionate contribution to meeting national, regional, and local demand for a continuous supply of minerals will be made while balancing the impact of development on the environment and communities. This will be achieved by:

1. Maintaining a minimum supply of aggregate throughout the Plan period.
2. Safeguarding identified resources of coal, hard rock and sand and gravel;
3. Promoting the efficient use of aggregates and encouraging the maximum use of alternative materials before the use of raw aggregate.
4. Ensuring that mineral development will not have an unacceptable impact on the environment and amenity of local residents.
5. Minimising the conflict between sensitive land uses and mineral operations by identifying buffer zones around mineral sites and protection zones around settlements

Policy M1 – Development in Mineral Safeguarded Areas

Development proposals within mineral safeguarding areas will only be permitted where it can be demonstrated that:

1. The mineral concerned is no longer of any value or potential value; or
2. The mineral can be extracted satisfactorily prior to the development taking place; or
3. In the case of temporary development, it can be implemented, and the site restored within the timescale that the mineral is likely to be needed; or
4. There is an overriding need for the development; or
5. The scale and location of the development would have no significant impact on the possible working of the resource.

Policy SP20 – Transport Network

Policy SP20 provides guidance on how the transport system and infrastructure is to be developed in a safe, efficient, and sustainable manner through the following measures:

1. Implementing key transport projects and supporting schemes identified in the Joint Transport Plan; 2. Promoting connectivity and access to public transport through improving bus and rail facilities;
2. Supporting enhancements to the walking and cycling network;
3. Promoting park and share schemes along key highway routes;
4. Promoting efficient use and links to the transport network through the identification of a road hierarchy;
5. Restricting development which would have an unacceptable impact on highway safety;
6. Requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport;
7. Requiring appropriate parking provision;
8. Facilitating movement of freight by means other than road.

Policy SP21 – Built Environment and Heritage

The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:

1. Encouraging high quality design standards in all development proposals;
2. Protecting arterial gateways from intrusive and inappropriate development;
3. Safeguarding features of historic and cultural importance;

	4. The identification of the following designated sites to enable their protection and where appropriate enhancement: (a) Landscapes of Historic Interest; (b) Historic Parks and Gardens; (c) Conservation Areas; (d) Scheduled Ancient Monuments; and (e) Listed Buildings and their curtilage.
Future Wales. The National Plan 2040	Future Wales – the National Plan 2040 Future Wales – the National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities. As described above, the Welsh development framework has been designed incorporating the principles of sustainable development at its core. This comes as a result of the Well-being of Future Generations (Wales) Act 2015 ('the Act') that gives a legally-binding common purpose – the seven well-being goals – to the public sector to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals. In a more detailed level, the National Plan contains 18 strategic and spatial policies. In view of the nature of the development proposals, the policies below have been identified as relevant to the scheme: Policy 1 – Where Wales will grow Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking Policy 7 – Delivering Affordable Homes Policy 8 – Flooding Policy 9 – Resilient Ecological Networks and Green Infrastructure Policy 11 – National Connectivity Policy 12 – Regional Connectivity <i>Fig.3 The Seven Goals of the Well-being of Future Generations (Wales) Act 2015</i>
Planning Policy Wales (PPW)	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. Paragraph 2.8 acknowledges that “planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales” and “the

most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making planning policy and decision making” as per Paragraph 2.9.

PPW defines placemaking as a “holistic approach to the planning and design of development and spaces, focused on positive outcomes”. This approach “considers the context, function and relationships between a development site and its wider surroundings” and “adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary”.

Fig.4 PPW Themes Collectively Contribute to Placemaking (extract from PPW Edition 12)



In light of the nature of the development proposals and their location, the following themes and policy topic areas are identified as relevant.

1. STRATEGIC & SPATIAL CHOICES

Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the development of specific proposals, or when formulating a development plan.

Good Design

Good design is one of these fundamental choices to creating sustainable places where people want to live, work and socialise. PPW 12 sets out five key aspects of good design which are essential to make placemaking happen:

1) Access and Inclusivity

This can be achieved “making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children” (Paragraph 3.6) and through measures and features that “enable easy access to services by walking, cycling and public transport” and “encourage people to meet and interact with each other”.

2) *Environmental Sustainability*

Paragraph 3.7 states that “developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement (Paragraph 3.7)” and be resilient through “an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment”

Paragraph 3.8 highlights that “landscape and green infrastructure considerations are an integral part of the design process” and, in a similar manner, addressing land contamination, instability and flood risk and providing for biodiversity benefits should be part of the design.

3) *Character*

Paragraph 3.9 highlights that “the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations”. It goes on to say that “the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials” will be particularly important in areas recognised for their particular landscape, townscape, cultural or historic character and value.

4) *Community Safety*

Paragraph 3.11 establishes that “crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions”

5) *Movement*

Paragraph 3.12 states that good design in this matter means “minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys”. It also remarks that “existing infrastructure must be utilised and maximised, wherever possible”.

Previously Developed Land

Paragraph 3.55 emphasises the preference of previously developed land as opposed to greenfield sites. It advises that “previously developed (also referred to as brownfield) land [...] should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome”.

The PPW definition of previously developed land is land “which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure”.

2. ACTIVE & SOCIAL PLACES

Transport

Paragraph 4.1.11 sets out that “development proposals must seek to maximise accessibility by walking, cycling, and public transport, by prioritising the provision of appropriate on-site”. In this respect, “the sustainable transport hierarchy must be a key principle in the preparation of development plans,

	including site allocations, and when considering and determining planning applications” as per Paragraph 4.1.14. The Welsh Government policies set out the sustainable transport hierarchy which is, in this order, from walking and cycling, public transport, ultra-low emissions vehicles to other private motor vehicles. Active travel is a cornerstone of the transport policies in Wales. Paragraph 4.1.31 confirms that “planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling”. With regards to vehicle parking, Paragraph 4.1.50 advises that a design-led approach should ensure that “appropriate level of car parking is integrated in a way which does not dominate the development”. Paragraph 4.135 requires new development to “provide appropriate levels of secure, integrated, convenient and accessible cycle parking”. <u>Housing</u> Paragraph 4.2.1 advises that “new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities”. Paragraph 4.2.18 acknowledges the potential on brownfield sites to deliver further housing when saying that “maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites”. 3. DISTINCTIVE & NATURAL PLACES <u>Green Infrastructure</u> Paragraph 6.2.1 defines green infrastructure as “the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places” and “at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks”. Paragraph 6.2.11 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that “with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places”. It is also advised that “there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents”. Paragraph 6.4.3 states that “the planning system has a key role to play in helping to reverse the decline in biodiversity and increase the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement”.
Technical Advice Notes	Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs: • TAN 2: Planning and Affordable Housing (June 2006) • TAN 5: Nature Conservation and Planning (September 2009) • TAN 10: Tree Preservation Orders (October 1997)

	• TAN 12: Design (March 2016) • TAN 18: Transport (2007)
SPG	The local planning policies are supplemented by Supplementary Planning Guidance (SPG). The following SPGs have been identified as relevant to the development proposals: • Design SPG 2017 • Affordable Housing SPG 2016 • Planning Obligations SPG 2016 • Open Space & Green Space SPG 2017 • Historic Environment SPG 2019 • Parking Standards SPG 2016
Planning History	
Planning History	The following planning history relates to the application site: • P2016/0649 Conversion of Caewern House (inc. demolition of existing extensions and outbuildings) to provide 8 No. 1 & 2 bed apartments. Construction of a detached two-story block providing 7 No. 1 bed apartments, plus 1 No. 2 bed detached bungalow and single storey bins/buggies/cycles enclosure, associated drainage, landscaping and highway works – Refusal due to failure to sign required S106 agreement for a financial contribution towards the provision of open space – Refused 16th November 2018 because the S106 Agreement was not entered into The following planning history in respect of the adjacent site is also of relevance: • P2013/1042 Demolition of existing building and erection of new 60-bed care home with ancillary car parking and engineering options – Approved 5th March 2014
Analysis	
Land Use Planning	Planning Policy Wales makes it clear that identifying a land supply to support the delivery of the housing requirement and a focus on the delivery of the housing requirement are key aspects of the planning system, stating at para 4.2.2 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. With regard to the principle of development, the following LDP policies are relevant: <u>SP3: Sustainable Communities</u> Policy SP3 relates to sustainable communities and stipulates that, within settlement limits “development which accords with the settlement hierarchy will be permitted in principle”. The supporting text to the policy advises at para 3.0.14 that “with the exception of Dormitory settlements, all settlements have defined limits, with greater potential for development incorporated for settlements that are higher in the hierarchy.”

	SC1: Settlement Limits Policy SC1 reconfirms that “development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle”. SP7: Housing Requirement Policy SP7 identifies a housing requirement of 7,800 dwellings over the plan period. It identifies that this will be delivered through a combination of sites with planning permission, housing allocations, windfall and small sites. The supporting text anticipates that windfall sites (i.e. unallocated sites of 10 residential units or more) would contribute 825 units towards the overall requirement. SP8: Affordable Housing Policy SP8 set-out a need for the delivery of 1,200 affordable homes within the authority area over the plan period. The site represents unallocated, previously developed (brownfield) land within the defined settlement boundary of Neath Abbey, and so its development for residential purposes fully accords with LDP Policies SP1 and SC1. The principle of development in land-use planning terms is therefore in compliance with the development plan. With regard to housing delivery, NPT’s latest published AMR (October 2022) identifies that the LPA had a cumulative shortfall in overall housing delivery of 3,146 dwellings against the LDP target (representing a delivery of just 44% against the target over the plan period elapsed to-date). The figures for affordable housing delivery are even more stark, evidencing that, of the 833 affordable dwellings which should have been delivered during the plan period to-date, just 72 have actually been provided, a shortfall of over 91%. The proposed development would therefore provide a valuable contribution of 36 dwellings towards the local authority’s targets of delivering 7,800 dwellings (825 of which were identified for delivery on large windfall sites such as this one), including 1,200 affordable dwellings, over the plan period. The site’s compliance with locational requirements of PPW and the LDP and, in particular, contribution towards affordable housing delivery, ensure full compliance with the relevant elements of PPW and the LDP, and weigh heavily in favour of the site’s residential development.
Demolition of Existing Property	The existing building has no heritage status and is in a significant state of disrepair. Notwithstanding this, it is recognised that there has historically been a high-level of community interest in the building, including in response to previous proposals for the redevelopment of the site, and it is understood that the property had once been considered for inclusion on the ‘local list’. Whilst, ultimately, the property was not deemed worthy of either statutory listing or inclusion in the ‘local list’ and consequently has no formal heritage status, Linc Cymru and the wider design team have had sensitive regard to its community prominence when considering their options for the site’s redevelopment. This included exploration of the viability of the potential reinstatement and conversion of the building into apartments at an early stage of the project, as referenced in our original pre-application enquiry in November 2022, as well as undertaking a series of community engagement events, in part in recognition of the strength of local feeling around the existing building.

	The original optioneering and associated cost appraisals for the site identified that: • The existing building is in an extremely dilapidated state of repair, and the costs of reinstating it would be prohibitive. • The siting and design of the existing Caewern House building would significantly limit the development potential of the remainder of the site, which would reduce coverage and consequently would further detract from achieving a viable development. • It is extremely difficult to meet Welsh Government requirements for new affordable housing units to achieve an EPC-A rating in a converted building, which would add further significant cost to the project (if the property were statutory listed then additional grant funding would be available however, since it has no heritage status, it is not). In order to support the above, and in response to the request of the LPA as part of pre-application discussions, this application is supported by summaries of Grant Outcomes, Works Cost Indexes, and ACG Outcomes for three development options (Appendix 1 to this document). OCE 1 & OCE 2 would involve the retention/part-retention of the existing building however would not be supported by Welsh Government on viability grounds. Only a new build option (OCE 3) would be financially viable. With regard to community engagement, a copy of a Public Engagement Report which summarises the outcomes of the initial community engagement events in October 2022 is enclosed at Appendix 2. This is now supplemented by a copy of the PAC Report, which summarises the outcome of the statutory Pre-Application Consultation process which took place in November/December 2022. The engagement exercises evidenced that, whilst there clearly remains a high-level of public interest in the building and a general preference amongst the community for the building to be retained, this is balanced by clear concerns around the ongoing vacancy and dilapidation of the building and associated anti-social behaviour and a recognition that something urgently needs to be done with the site. In summary the building has no heritage status and is accordingly afforded no protection from demolition. Notwithstanding this, it has been robustly evidenced that there is no viable opportunity to retain the building, and furthermore that there is a need for urgent action at the site in response to in response to issues associated with anti-social behaviour and the general dilapidation of the building.
Design and Character	Policy SC1 and Policy SP3 define the nature of developments to be permitted in relation to their location within the Settlement Hierarchy. The proposal Site is categorised as a “Town” within the Policy SP3 Settlement Hierarchy List, which is regarded as the most sustainable location for development. This category regards Neath as a regionally important settlement, providing the widest and most diverse range of functions, which is located on the strategic road network and fully accessible by a range of transport options, therefor the principle of development in this location is justified and in robust accordance with these Policy’s. Policy SP5 furthermore allocates Neath as a “Strategic Regeneration Area”. Therefore, it is concluded that development proposals within this area are of wider benefit to the County Borough as a whole and are encouraged over other less strategic Sites. The Design and Access Statement that accompanies this planning application provides full details of the development in this regard following the PPW’s key aspects of good design: Access and Inclusivity; Environmental Sustainability; Character; Community Safety; and Movement. The scheme seeks to deliver a well-designed and well-informed residential development of 36 affordable flats, which effectively integrate with the existing residential neighbourhood and highway network compliant with local policy.

The key place-making principles incorporated within the design of this scheme are as follows:

- Creating a strong sense of place through high quality residential architecture, materials and a robust, permeable and legible layout that clearly defines the private and public realms
- Resolution of the relationships with both Heol Illtyd and Twyn Teg properties with attractive and welcoming properties that do not overbear.
- Placing landscape design at the heart of the proposals by retaining and augmenting existing landscape assets so that street is characterised by green infrastructure rather than by roads and parking
- Maximising and strengthening pedestrian safety and connectivity within and beyond the site
- Providing active frontage, security, natural surveillance and both visual and physical permeability within and along the edges of the proposed development to ensure a safe and sustainable place to live.

Furthermore, PPW stipulates that good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers flexibility in use, and provides buildings and environments that are convenient and enjoyable to use for everyone. The scheme includes provision for apartments suitable for adaptive needs, therefore ease of accessibility and movement is an important factor throughout. The layout of the site will be a safe and easy place for people to move around. Both the external arrangement of the site and internal design of the accessible units are designed to be fully accessible to people with varying degrees of mobility.

Policy BE1 – Design, along with the Neath Port Talbot County Borough Council's SPG on "Design" adopted in 2017 provides further extensive detail on the objectives of good design, in order to create attractive, safe and sustainable places which respect the context of local townscape, providing enhancements where possible.

Caewern House' principal façade faces 40 degrees from south, this is reflected in many of the domestic properties in the immediate vicinity. The design has been developed to integrate its scale with that of the local context and therefore consists of 3-storey apartment buildings containing 6 apartments each, in keeping with local characteristics. Careful attention has been paid to ensure that the proposals do not dominate those surrounding the site. The design proposals furthermore provide safe and secure private garden areas for the residents of the proposed development in addition to reinforcing existing landscape assets by placing them at the centre of the public realm proposals.

The inherently robust nature of housing designed in accordance with WDQR 2021, which amongst other guidance incorporates both the Welsh Government Development Quality Requirements and the Lifetime Homes standards will ensure that the development can anticipate potential change in the make-up and needs of occupiers, thereby facilitating future diversity both within the development and in the wider locality

Car parking has been allocated in accordance with adopted Neath-Port Talbot supplementary planning guidance, so that all 1 bedroom properties are provided with a maximum of 1 car parking space. Wherever possible, car parking has been designed to be as close as possible to the entrances of proposed flats in order to ensure easy access to accommodation for occupants and visitors, including those whose mobility may be limited. Parking space sizes are designed in compliance with adopted Neath-Port Talbot supplementary planning guidance and with the requirements of Lifetime Homes. Ease of pedestrian and cycle access to the Neath Town, together with the proximity of bus services to both the district centre, will also contribute to reduced reliance on the car as a means of transport.

	The Site's vehicular access will be provided from Dwr-yFelin Road, this will act as the development's main entrance. Provision of this access is proposed via an upgraded and relocated private access road onto Dwr Y-Felin Road, where a replacement priority T-junction would be created some 30-metres south of bus stop "Heol Glynderwen – Southbound". Active Travel links will comprise of the retention of the existing footpath link to Dwr-y-Felin Road, as well as the creation of a new footpath with link to Heol Illtyd Road. Prior consultation with the local residents identified the importance of the existing site access as a throughfare, with concern raised for its use at night. The proposal will seek to improve this access as part of the meshing with the surrounding urban fabric as an important pedestrian link between Heol Illtyd and Dwr-Y-Felin Road. The existing mature landscape of Caewern House has also been a key consideration in the development of the design. The current design layout has been configured around existing trees and existing level restrictions. Additionally, the site plan includes a sizable amount of secure shared amenity greenspace surrounding the proposed apartments along with strategic landscaping. Orientation of the proposed buildings and the internal living spaces southwards also benefit from solar gain. Due to design details described above it is regarded that the design of the development accords with the below criteria as set out within the SPG: <i>a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;</i> <i>b) The layout and form of the development does not preclude the reasonable use of other adjacent land;</i> <i>c) Developing brownfield land in preference to greenfield land where possible;</i> <i>d) Minimising building exposure while maximising solar gain.</i> It is concluded that the scheme has been designed in compliance with both local and national policy.
Residential Amenity	Policy BE1 states proposals should not have any negative impact to "the amenity of occupiers of adjacent land or the community" and "achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well-lit environments and areas of public movement)". PPW objectives of "Strategic & Spatial Choices" also urge the importance of mindful design in regard to residential amenity highlighting that "the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations". Given the net site area, the residential development has the appropriate density. The site's layout is considered to adequately balance the required space for residential lots, public parking lots, and landscaping areas. The plot arrangement is such that neither overlooking effect nor overbearing effect would occur to the future occupiers. By reason of separation distance, no adverse effect is anticipated between the existing properties and surrounding dwellings. All house types for the residential scheme have been designed to provide good standard of amenity for future occupiers of the dwellings. All habitable rooms will have an acceptable standard of light, outlook and privacy and their amenity spaces sufficiently private and usable and appropriate for family-sized dwellings such as those that are proposed.

	The development pattern of the proposals ensures continuity of enclosure, active frontages and legibility, which will contribute to a safer built environment. New public routes will benefit from appropriate levels of street lighting, whilst the orientation of the dwellings means that parking areas and footpaths will benefit from natural surveillance in order to protect people and property by contributing to the safety of public spaces and routes. In conclusion, the design of the development will ensure good levels of residential amenity in accordance with the LDP and with PPW Placemaking Design.
Highways Impact and movement	PPW Para 3.48 encourages higher-density development in highly sustainable locations, stating: <i>“Planning authorities should reassess development sites which are highly accessible to non-car modes and allocate them for travel intensive uses such as offices, shopping, leisure, hospitals and housing of sufficient density to fully utilise their accessibility potential.”</i> At the concept stage 2no. options for the vehicular access into were considered as follows: • The upgrading of the existing vehicular access from Dwr-Y-Felin Road • A new vehicular access from Heol Illtyd. A possible third option for a new vehicular access from Twyn Teg to the east was dismissed early in the process on the basis of the presence of a watercourse, challenging topography, land-ownership and tree cover. There are constraints associated with both options. Heol Illtyd is a quiet residential estate road which is subject to significant on-street parking, the road sits higher than existing levels on the site, and there is third-party land between the adopted highway and the application site. On the other hand, the existing access from Dwr-Y-Felin Road is not of appropriate width and does not provide suitable junction radii. Whilst there is sufficient land to make the necessary upgrade works to this access, the existing mature trees which line with this access road represent a constraint to the delivery of these improvements. Notwithstanding the constraints, Heol Illtyd was originally identified as the preferred option for access in order to minimise potential tree loss, and accordingly was presented as such as part of the initial public engagement exercise. This element of the initial proposals however generated significant concern for both residents and politicians, who considered that Heol Illtyd, which is a residential cul-de-sac with significant on-street parking, would not be appropriate to serve the traffic generation from the proposed development and that the development would consequently give rise to an adverse detrimental impact on both highway safety and the amenity of existing residents. In direct response to this feedback the proposals were revised to provide vehicular access from Dwr-Y-Felin Road via an upgraded T-junction and access road which would avoid intensification of the vehicular movement along residential streets of Heol Illtyd, Heol-Y-Wern and Llgad-Yr-Haul. A Transport Statement has been prepared for this scheme and attached with this document detailing the Site transport proposals and associated information. As part of the proposals, the existing access road will be replaced by a newly constructed road slightly north of its present location. The carriageway would sit slightly lower than the existing public footpath that runs along the western boundary of the site and adjoining Pobl care facility. This carriageway has been designed to be 5.5 metres wide which is suitable for two large vehicles to pass according to Manual for Streets Figure 7.1, whilst junction radii of 6-metres would be used to control vehicle speeds entry to the newly constructed lane.

	In terms of visibility, given the rollout of the '20's Plenty in Wales' in September 2023, Dwr-Y-Felin will be subject to a 20mph speed limit. 25-metres visibility splays, measured from a point 2.4-metres back from the give-way line, show that there will be no visibility obstruction. The proposed junction arrangements have also been subject to swept-path analyses assuming a 11.2-metre refuse collection vehicle, as required by local guidance. Additionally, to ensure all units are within the required 30-metre distance of a bin store, as per Manual for Streets, the proposed development includes two bin store locations. In order for pedestrians to access the existing bus stops and services on Dwr-Y-Felin Road to the south, the existing footpath link will be retained improved as appropriate. A new footpath/cycleway link will be created to adjoin Heol-Illyd Road. This pedestrian footway located on the southern side of Dwr-Y-Felin Road is considered as an "Existing Route" under the Active Travel Wales Act. By way of development, natural surveillance of the existing footway will be significantly improved, with associated improvements in perceived safety and security, addressing an existing issue identified by early consultation with the local community. The proposed access strategy allows for direct, safe, and convenient connections to an active travel route and beyond, supporting and aligning with Neath Port Talbot's overall active travel objectives. Cyclists will be able to access the site via the proposed access road and cycle parking will be in accordance with Neath and Port Talbot Supplementary Planning Guidance (SPG) document entitled "Parking Standards" which details cycle parking should be provided within the curtilage of dwellings and considered within the dwelling design, or where external cycling parking is provided, cycle stands should be provided at one space per five bedrooms, which based on the scheme proposed equates to 8 spaces. These would be provided within a cycle store within the central courtyard area. The Active Travel section of the Transport Statement details various modes of active travel opportunities from site on foot, by bike and by public transport inclusive of GIS modelling to portray links from Site. The evidence set out within this section of the report confirms that a wide range of non-car travel options would be available to the future residents of the proposed development. The Active Travel section identifies a number of facilities which would facilitate non-vehicular trips to a wide range of local destinations, in line with the policy objectives of Planning Policy Wales and the Active Travel Wales act. With regard to vehicle parking, Neath Port Talbot County Borough Council's adopted Supplementary Planning Guidance on "Parking Standards" identifies a parking maximum of 1 space per bedroom (to a maximum of 3 per dwelling) as well as 1 visitor space for every 5 dwellings. The proposed development would therefore generate a maximum provision of 47 spaces. The guidance however identifies that a parking reduction is acceptable where a certain sustainability score can be achieved. Following the guidance outlined in the Parking Standards SPD (October 2016), the site's sustainability index has been calculated at 16 (as detailed in the Transport Statement) which facilitates a reduction of up to 2 spaces per dwelling. The scheme proposals offer a balanced approach of providing 36 resident spaces, one space per dwelling, in addition to informal visitor parking which can occur on the access road.
Drainage	A Drainage Strategy has been developed for the Site, which has been designed in compliance with the relevant SABs legislation. The drainage solution is to include permeable paving/attenuation with potential swales to the lower end of the site. New foul drainage connections to the existing combined sewer serving Caewern House are to be made and the Existing Combined Sewer is to be retained, to accommodate foul flows from the proposed development.

	With the integrated design approach to Sustainable Urban Drainage Systems (SuDS) the proposals demonstrate a clear commitment to achieving the aims set out in TAN 12, as follows: • To use sustainable materials with low environmental impact (embodied energy) that are sourced sustainably (i.e. Forestry Stewardship Council timber) as well as maximising the use of used, reclaimed and recycled materials. • To employ a sustainable approach to water in terms of its supply (rainwater harvesting/flow restriction), demand management (use efficiency) and drainage (SUDs) and its effect on the local water table • To deal with waste management both during and after construction (re-use & disposal), including the provision of appropriate facilities for sorting, storing and recycling of waste in buildings and across the site • To demonstrate climate resilience by taking into account the climate the development is likely to experience over its lifetime by managing & minimising climate change effects (e.g. extreme temperatures)
Ecology	This application is supported by: • Preliminary Ecological Appraisal (November 2022) prepared by I & G Ecological Consulting. • Bat Survey Report (November 2022) prepared by I & G Ecological Consulting. • Natural Resource Wales's Pre-Application Consultation response dated 23rd December 2022 and follow-up correspondence. The Preliminary Ecological Appraisal (herein PEA) was informed desk-based assessment and ecological site survey which assessed the suitability of the site for badgers, otters, dormice, breeding birds, bats, reptiles, amphibians, water voles and marsh fritillary butterflies. The survey also sought to identify the presence or otherwise of non-native species. The PEA identifies that the site consists mainly of buildings and hardstanding, scattered trees and shrubs, amenity grassland and small pockets of scrub with low ecological interest, but that the native trees and shrubs have higher ecological value. The report identifies that the existing property and outbuildings have bat roost potential and consequently that targeted bat emergence surveys are required. The Bat Survey Report was informed by a daytime bat scoping survey which took place on 25th August 2022, a dusk activity survey which took place on 25th August 2022, and a dawn activity survey which took place on 10th September 2022. During the scoping survey no bats were found but droppings were found beneath a hole in the roof on the single storey section to the north-east, and the property was considered to have confirmed potential to support roosting bats, and a confirmed risk of bats using the features present. During the activity surveys up to four Soprano pipistrelle were seen to leave/enter a hole in the roof on a single storey section, and this species as well as Common pipistrelle were detected foraging and commuting on site. Recommendations within the PEA and Bat Survey Report include: • The provision of 2 Improved Roost Maternity (or similar) bat boxes and 2 Harlech Woodstone (or similar) bat boxes to be affixed to mature trees within the curtilage of the site. • Bat access is to be provided on the new buildings through 1 Vivaro Pro Build-in (or similar) bat box installed in each gable end wall (x 12 in total) of the new buildings. • The provision of 2 open-fronted and 2 small-holed bird boxes to be affixed to mature trees within the curtilage of the property.

- 1 Sparrow terrace to be affixed to each gable end wall of Type A Block buildings (x 2 in total) and x 1 House martin nest cup to be affixed at the apex of each gable end wall of Type B Block buildings.
- Retention and protection of mature trees where possible, and their replacement with native trees where it is not.
- Vegetation clearance outside of bird nesting season.
- Treatment and disposal of invasive non-native species in an appropriate manner.
- Biodiversity enhancements including hedgehog appropriate fencing, and the planting of native and pollinating species.

The Bat Survey Report also confirmed that a European Protected Species (EPS) licence would be required to derogate the existing bat roosts.

The above reports were made available to Natural Resources Wales (herein NRW) as part of the statutory Pre-Application Consultation (PAC) process which ran from 28th November 2022 to 26th December 2022. On 23rd December 2022 NRW provided their written response to the PAC Consultation. With regard to bats, which are a European Protected Species, the NRW response advised:

“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:

- 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.*
- There is no satisfactory alternative and*
- 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."

NRW conclude by advising that they "do not object to the proposal" however require an informative be attached to any planning permission confirming that an EPS is required.

Separately in their response, NRW expressed concern with the application as proposed because of inadequate information in respect of bats. It was however later clarified by way of correspondence that this simply related to the need for a tree inspection survey prior to the felling of any trees.

The LPA's pre-application response advises that evidence of bats is a material consideration in respect of the demolition of the original building having regard to the nature and extent of derogation tests that need to be satisfied before any planning permission and/or licence for development that results in disturbance to a EPS can be granted. In this regard it should be noted that:

- The principle of the derogation of a bat roost in order to facilitate a site's redevelopment to meet a local affordable housing need is firmly established as constituting an "imperative reason of overriding interest" for the purposes of the first test.
- The detailed viability information provided above clearly evidences that no alternative to the derogation of the roost exists in this instance, as no option for the retention of the building containing the roost would be commercially viable. Indeed, the building has now been vacant for a period of in excess of 10 years and has significantly deteriorated in this time. Ultimately, therefore, unless the redevelopment of the site can be secured the roost will eventually be lost as the building continues to deteriorate. This addressed the second test.
- NRW have confirmed in their response that, subject to the identified mitigation being implemented, they are satisfied that development would not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range, and so the third test would also be satisfied.

With regard to other ecological considerations, all recommendations of the PEA and Bat Survey Report can be accommodated within the development in order to deliver both mitigation and appropriate ecological enhancement, including:

- 4no. bat boxes will be located on appropriate trees within the site.
- 12no. bat boxes will be installed into the gable ends of the proposed buildings.
- 4no. bird boxes will be located on appropriate trees within the site.
- Bird boxes will be located in the gable ends of the proposed buildings.
- Mature trees will be retained wherever reasonably possible and, where it is necessary to remove trees, these will be replaced by native tree planting, located so as to maximise the opportunity for them to reach full maturity.
- Vegetation clearance will be undertaken outside of bird nesting season.
- Invasive non-native species will be treated and removed using approved techniques.
- Other biodiversity enhancements including hedgehog fencing and the planting of native and pollenating species will also be incorporated.

It is considered that the above mitigation can be appropriately controlled via the imposition of planning conditions.

	Having regard to the above it is considered that the proposed development would be in full accordance with local and national planning policy relating to ecology and European Protected Species.
Trees	This enquiry is accompanied by a detailed Tree Survey & Constraints Plan, which has been a key consideration in developing the design proposals as identified in earlier sections. Most of the existing trees on the development site are located around the site peripheries. The siting of buildings and infrastructure has been developed around the RPAs of the higher quality trees wherever possible ensuring that, for the most part, only low-quality and dangerous trees require removal. The exception to this is in respect of the access where the requirement to realign and widen the access road will result in the loss of some mature, Category B trees. Given that alternative options for access have been fully explored and dismissed (as detailed elsewhere in this document) this represents an unfortunate, but inevitable, consequence of securing the regeneration of the site. Where trees are to be lost as a result of the redevelopment of the site (regardless of quality), it is proposed to replace them on a 3 for 1 basis in line with the recommendations of PPW, and as evidenced on the landscaping proposals.
Conclusion	The principle of re-developing the site is appropriate given the sustainable location of the site within Caewern and the previously developed nature of the land. The form and appearance of the development will respond to the character of the area and ensure good conditions of residential amenity. Sustainability in transport is feasible given the availability of services and facilities nearby and it has been enhanced by the improvements on Site of pedestrian infrastructure and level of car parking provision. The flats have furthermore been designed for people with varying degrees of mobility ensuring inclusivity of design. The provision of affordable housing accords with the affordable housing need for the area and development of this Site for residential purposes is in line with the various relevant Policy. It has also been demonstrated that whilst not protected by Policy, the retention and conversion of the Caewern House main building is not viable. Biodiversity and habitats have been considered and appropriately assessed to the extent that the development will not cause any harm subject to measures for protection, mitigation and enhancement. The scheme furthermore incorporates strategic design and landscaping to integrate into the Site's character and landscape context. For these reasons, it has been established that the design of the scheme demonstrates placemaking in action. The aforementioned factors also show how closely the residential development complies with the PPW and all applicable TANs that make up national policy. The plan also complies with the key principles of the Neath Port Talbot council LDP and the recommendations made in the adopted SPGs. In conclusion, the proposed development is suitable, sustainable, strategic and is fully consistent with the planning policy framework.