

PLANNING STATEMENT

Adventure Playground, Gnoll Park

August 2024



Summary

Proposal:

Proposed construction of new woodland play area and associated works.

Location:

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

Date:

August 2024

Project Reference:

S23.117

Client:

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

Product of:

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Disclaimer:

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Introduction

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

Drawing name	Drawing reference
Site Location Plan	2080-07-HIR-A-DR-00020-S2-P1
Existing Site Plan	2080-07-HIR-A-DR-00001-S2-P1
Drainage Layout	2080-07-JUB-C-DR-00505-S2-P2-P2
Existing Landscape Plan	2080-DLA-08-DR-L-S3-3008-P01
Planting Plan	2080-DLA-07-DR-L-S3-3002-P03
Vegetation Removal	2080-DLA-07-DR-L-S3-1001-P02
Tree Survey Plan	TS589

Topographic Survey	N/A
Reech Sports and Play Proposal	N/A

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

Document name (reference where appropriate)	Prepared by
Planning application forms (1APP)	Asbri Planning
Planning Statement	Asbri Planning
PAC Report	Asbri Planning
Heritage Impact Statement	Hiraeth Architecture
Green Infrastructure Statement	Davies Landscapes
Tree Survey and Arboricultural Constraints Report	Neath Port Talbot County Borough Council
Preliminary Ecological Appraisal	Neath Port Talbot County Borough Council
Coal Mining Risk Assessment	Eart Science Partnership
Updated Ground Conditions Assessment	Jubb
Written Scheme of Investigation	Dyfed Archaeological Trust
Historic Environment Desk Based Assessment	Dyfed Archaeological Trust
Construction Environmental Management Plan	Andrew Scott
Accessories Cable Car Series CA 1302 Product Sheet	Cemer Playground Equipment
Accessories Crawling Tunnel CA 1000 Product Sheet	Cemer Playground Equipment
Accessories Worm Series CA752	Cemer Playground Equipment
Accessories Worm Series CA754	Cemer Playground Equipment
Adventure Group Fantastic Series Ages 253P Bird Tower Product Sheet	Cemer Playground Equipment
Adventure Group Metal Series AGMS 65 Product Sheet	Cemer Playground Equipment
Dynamic Group Compact Series DGCS 1017A Product Sheet	Cemer Playground Equipment
Dynamic Group Compact Series DGCS 1053 Product Sheet	Cemer Playground Equipment
Dynamic Group Silver Series C-SS 67	Cemer Playground Equipment
GEO Group Jungle Series GGJS 1017P Product Sheet	Cemer Playground Equipment

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

Site Description and Context

General Location

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

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



Site Features

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

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

Individual Application Site

- 2.9 Application 8 – Adventure Playground
- The site is located within an area of woodland that lies to the north-east of the Fishpond in Gnoll Country Park. The site sits next to an existing footpath, and parking areas and visitor facilities are located to the north. The site extends to approximately 1900 square metres.

Access

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

Planning History

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

LPA Reference	Proposal	Decision
N1993/0394	De-siting first, fish and guinea ponds, and watercourse. New road and car park, visitor centre, playground, golf course	Approved 25/10/2023
N1993/0416	Visitor Centre for information and leisure purposes	Approved 25/10/2023
N1993/0535	Visitor Centre	Approved 06/12/1993
N1993/0537	General refurbishments including new access steps	Approved 20/12/1993

N1994/0012	Removal of condition 4 and 5 application no. 93/394 and construction of footpath from Fairyland to car park	Approved 07/03/1994
N1994/0436	Modification to car parking area adjacent to first pond as approved on 2/3/93/0394/11	Approved 19/09/1994
P1997/0491	Renovations and improvements to Pond Cottage	Permitted Development 13/06/1997
P2014/0598	Prior notification for demolition of classroom building.	Prior Notification Approval Not Required 18/07/2014
P2017/0312	Extension to existing children's playground	Approved 20/06/2017
P2022/1055	Installation of 8m high multi play tower/equipment (to replace existing play apparatus/thick climbing unit)	Approved 01/02/2023
P2024/0014	Temporary modular cafe and toilets facility with enclosed external seating area (for a maximum of 12 months)	Withdrawn 12/02/2024
P2023/0659	Demolition of existing visitor centre and construction of new 2 storey visitor centre including new balustrades, sprinkler tank, external lighting of pedestrian routes from existing car park and associated landscaping and drainage works	Approved 21/03/2024
P2023/0676	Proposed single storey rear extension and change of use of Pond Cottage to form a tea room/cafe (A3 use)	Approved 18/04/2024
P2024/0145	Construction of new timber footbridge across existing watercourse to connect Gnoll Park with Brynau Woods	Approved 18/04/2024
P2023/0732	Consolidation and repair works to Gnoll House ruins and creation of education interpretation centre in Gnoll House cellars	Approved 23/05/2024
P2024/0129	Proposed extensions to existing car park and construction of new facilities building and associated works.	Approved 23/05/2024
P2024/0298	Details to be agreed in association with condition 4 (contamination assessment) of planning permission P2023/0659 dated 21.03.2024 (replacement visitor centre)	Approved 06/06/2024

P2023/0789	Creation of new visitor accommodation comprising the reinstatement and landscaping of former kitchen gardens, reconstruction of former potting sheds to provide a new office/reception and 2 no. self-catering holiday units, construction of 14 no. new holiday cabins, a welfare/laundry building, replacement workshop/machinery store and new parking area within pumphouse service yard	Approved 19/06/2024
P2024/0307	Details to be agreed in association with condition 6 (gigabit capable broadband infrastructure) of planning permission P2023/0659 dated 21.03.2024 (replacement visitor centre)	Approved 09/07/2024
P2024/0299	Details to be agreed in association with condition 5 (remediation strategy) of planning permission P2023/0659 dated 21.03.2024 (replacement visitor centre)	Approved 17/07/2024
P2024/0306	Details to be agreed in association with condition 3 (CEMP) of planning permission P2023/0659 dated 21.03.2024 (replacement visitor centre)	Approved 19/07/2024
P2024/0308	Details to be agreed in association with condition 3 (CEMP) of planning permission P2024/0145 dated 18.04.2024 (timber footbridge)	Approved 19/07/2024
P2024/0309	Details to be agreed in association with condition 3 (CEMP) of planning permission P2023/0676 dated 18.04.2024 (extension and change of use to tea room/cafe)	Approved 19/07/2024
P2024/0357	Details to be agreed in association with condition 4 (intrusive site investigation) of planning permission P2023/0732 dated 23.05.2024 (education and interpretation centre)	Pending Determination
P2024/0358	Details to be agreed in association with condition 11 (site safety certification) of planning permission P2023/0732 dated 23.05.2024 (education and interpretation centre)	Pending Determination
P2024/0383	Details to be agreed in association with condition 3 (construction and environmental management plan) of	Pending Determination

	<i>planning permission P2024/0129 dated 23.5.24 (extensions to car park and new facilities building)</i>	
<i>P2024/0384</i>	<i>Details to be agreed in association with condition 3 (construction and environmental management plan) of planning permission P2023/0732 dated 23.5.24 (education interpretation centre in Gnoll House cellars)</i>	<i>Pending Determination</i>
<i>P2024/0404</i>	<i>Details to be agreed in association with condition 17 (cycle parking) of planning permission P2023/0659 dated 21.03.2024 (replacement visitor centre)</i>	<i>Pending Determination</i>
<i>P2024/0405</i>	<i>Details to be agreed in association with condition 12 (cycle parking) of planning permission P2023/0676 dated 18.04.2024 (extension and change of use to tea room/cafe)</i>	<i>Pending Determination</i>

Proposal

- 3.1 The proposal seeks full planning permission for the construction of a woodland play area and associated works.
- 3.2 The proposed play area will include climbing structures and slides, along with a junior area for children aged between two and eight containing soft surfaces and play panels. It will be accessible for all and is located in close proximity to the footpath which circles around the Fishpond. The proposals to improve the parkland create a demand for improved play parks close to the central areas of activity, something which this application looks to address. At present, there are three play areas within the County Park. One of the existing play areas that lies within the Fishpond Wood is to be replaced by this proposal.
- 3.3 A planting plan has been produced by Davies Landscapes which aims to offer screening of the play area from views in the nearby landscape. The proposal will maintain as many trees as possible, and vegetation that is lost will be replaced by appropriate native planting. These measures are deemed to provide substantial screening of the area even during the Winter months.
- 3.4 This application is one of several applications being made within the Country Park. The wider proposals have been supported by Levelling Up Funding (LUF) from Welsh Government which *"is especially intended to support investment in places where it can make the biggest difference to everyday life, including ex-industrial areas, deprived towns and coastal communities."* It has been introduced to help local areas identify real local priorities for investment. The scheme aims to utilise the LUF to create an attractive environment, heritage and tourism proposition that will benefit the Country Park along with the wider area, making it a highly desirable destination with many economic benefits.
- 3.5 Hiraeth Architects and NPTCBC undertook a public consultation event at Gnoll Estate Country Park Visitor Centre, which displayed all information included in the Stage 1 Levelling Up Funding document. A formal pre-application consultation took place between 18th May 2023 and June 15th 2023, with site notices displayed on site, letters sent to statutory, other and community consultees, along with adjoining residents. In addition to this, a response desk was set up in the visitor centre. Further information concerning the pre-application process and the responses gathered can be found in the submitted PAC Report.

Planning Policy Context

Introduction

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

National Level

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

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

wealth generated through securing decent work.

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

- 4.5 Within the Act, sustainable development is defined as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

National Development Framework: Future Wales – The National Plan 2040

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

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

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

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

A Wales where people live:

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

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

Policy 1 – Where Wales will Grow

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

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

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

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

Policy 9 – Resilient Ecological Networks and Green Infrastructure

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

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

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

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

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

Planning Policy Wales (Edition 12)

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

4.15 Its primary objective is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

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

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

- 4.21 Paragraph 3.9 focuses on how the special characteristics of an area should be fundamental for development design: *"The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process and expressed, when appropriate, in a design and access statement"*.
- 4.22 Paragraph 4.1.11 supports the above information, by encouraging development of active travel and sustainable transport infrastructure and services. It notes that *"proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services."*
- 4.23 Paragraph 6.1.2 states *"The historic environment is made up of individual historic features which are collectively known as historic assets. Examples of what can constitute an historic asset include:*
- Listed buildings;*
 - Conservation areas;*
 - Historic assets of special local interest;*
 - Historic parks and gardens;*
 - Townscapes;*
 - Historic Landscapes;*
 - World Heritage Sites; and*
 - Archaeological remains (including scheduled monuments)."*
- 4.24 In respect of Historic Park and Gardens, PPW states *"Planning authorities should value, protect, conserve and enhance the special interest of parks and gardens and their settings included on the register of historic parks and gardens in Wales. The register should be taken into account in planning authority decision making. Green Infrastructure Assessments should be used to explore the role of historic parks and gardens and the findings of other landscape character assessments should be fed into historical and cultural assessments to ensure consistency of information."*

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

Technical Advice Notes

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

- Technical Advice Note 5: Nature Conservation and Planning;
- Technical Advice Note 12: Design;
- Technical Advice Note 16: Sport, Recreation and Open Space; and
- Technical Advice Note 24: The Historic Environment

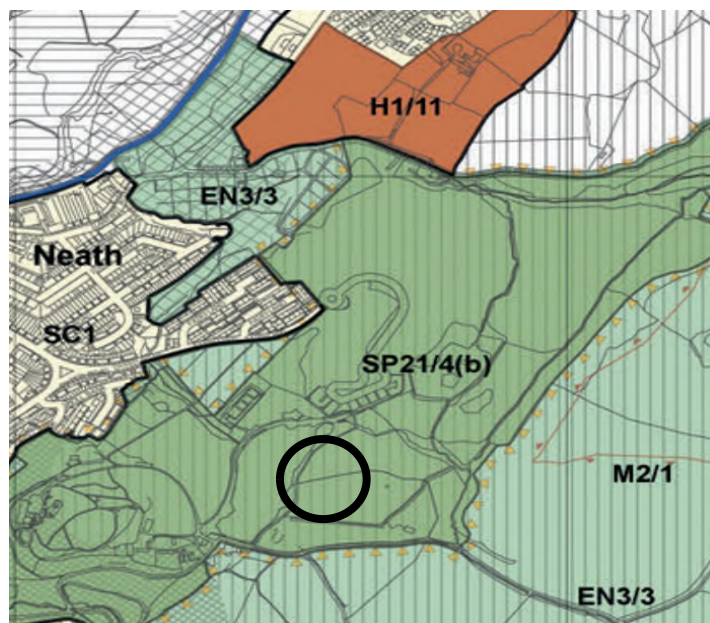
Local Level

Neath Port Talbot County Borough Council Local Development Plan

- 4.27 The Neath Port Talbot County Borough Council Local Development Plan (LDP) was adopted in January 2016 and is the prevailing development plan for the County. The application site lies outside the settlement boundary relating to Tonna as shown below in Figure 3. From the map, the following LDP policies are applicable to the site:

- M1 - Development in Mineral Safeguarding Areas
- EN3/3 - Neath / Tonna / Cimla / Efail Fach Green Wedge
- SP5 - Coastal Corridor Strategy Area
- SP21/4(b) - Built Environment and Historic Heritage (Historic Parks and Gardens)
- M2/1 - Surface Coal Operations

Figure 3: NPTCBC LDP Map



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

Policy Reference	Relating To...
Policy SP1	Climate Change
Policy SP2	Health
Policy SP3	Sustainable Communities
Policy SC1	Settlement Limits
Policy SP4	Infrastructure
Policy I1	Infrastructure Requirements
Policy SP5	Development in the Coastal Corridor Strategy Area
Policy OS2	Protection of Existing Open Space
Policy EN3	Green Wedges
Policy SP15	Biodiversity and Geodiversity
Policy EN7	Important Natural Features
Policy M1	Development in Mineral Safeguarding Areas
Policy M2	Surface Coal Operations
Policy SP21	Built Environment and Historic Heritage
Policy BE1	Design

Supplementary Planning Guidance

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

- Infrastructure Requirements

- Biodiversity and Geodiversity
- Design
- The Historic Environment
- Open Space and Greenspace

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

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

4.31 Within the document, the following advice is provided:

- *Setting - When considering change, you should take a holistic approach to understanding its potential impact on setting. The impact of change on any one element may have unintended consequences for the setting if it is not properly considered.*
- *Views - Over time, views can be lost or compromised. This may result from inappropriate planting, incongruous development, or from lack of maintenance which has allowed vegetation to grow and obscure the intended view. Once you have identified the contribution of views to the significance of your registered historic park or garden, you may be able to open up and manage intended views which will enhance the site's historic character and heritage value, as well as your appreciation of it.*
- *Archaeology - Significant archaeological features may be present in a historic park and garden; they may be undesignated or as yet undiscovered. When considering change that may impact on archaeological features you should contact your local planning authority's archaeological advisors for advice.*
- *Layout - It is important that you understand the significant elements of the historic layout of your registered historic park or garden and interpret their evolution. This will help you to make informed and sympathetic management decisions without compromising its historic significance.*
- *Entrances and Routes - Wherever possible, you should keep historic circulation routes open. Information in the register entry and historic map research can help you to understand which routes are significant. If possible, you should avoid creating additional routes which subdivide parkland or alter*

the historic layout. If a new route is unavoidable or highly desirable, you should give it careful consideration to ensure minimal adverse impact on your registered historic park or garden. If additional routes are required, consider opportunities to open up former historic drives and tracks through the site.

- *Historic Boundary Features - You should retain historic boundary features where possible and your repairs should use traditional materials and methods. Where possible, avoid additional permanent boundaries in open parkland because they fragment the landscape physically and visually, and alter the historic layout. It is also important to consider the function of the boundary.*
- *Garden Building and Ornaments - Built structures are often vulnerable to damage, decay and neglect. Routine management and maintenance are important to ensure longevity. Your repairs should use sympathetic materials and techniques. They need to be informed by an understanding of the historic structure and its condition. It is advisable to seek advice from an appropriately qualified and experienced professional before repairing historic structures.*
- *Water Features - Like other historic features in your registered historic park or garden, it is essential to understand the significance of water features and associated water management structures before making changes to them.*
- *Planting - Registration does not place any restrictions on planting layout and choice of plants; however, understanding the significance of the planting in your registered historic park or garden can help you to manage it and enhance historic character.*

Appraisal

Overview

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

Principle of Development

- 5.3 The proposal concerns the development of a woodland play area and associated works within Gnoll Country Park. Within the LDP, the site lies outside settlement limit, but is within a designated heritage Park, as recognised under Policy SP21.
- 5.4 In terms of the principle of development, the key LDP policies for consideration are policies EN3 (Green Wedges), SP21 (Built Environment and Historic Heritage), and BE1 (Design).
- 5.5 The site is located within an area of woodland located to the north-east of Fishpond in Gnoll Country Park. The site lies next to an existing footpath which loops around the Park. A new woodland play area is proposed to improve visitor attraction within the Park, along with the provision of a landscaping scheme to screen the development from key views within the historic parkland .
- 5.6 Neath Port Talbot County Borough Council has submitted a successful funding application to the UK Government's Levelling Up Fund to deliver £12 million of investment over the next two years at Gnoll Estate Country Park. The overarching focus of the Gnoll Estate Country Park project is to improve facilities, enable the restoration of the various heritage assets and enhance the natural environment within the Park in order to boost tourism prospects across the Park.
- 5.7 Policy SP21 (Built Environment and Historic Heritage) is "*encouraging high quality design standards in all development proposals*". The impact of this development upon the setting of the Park will be minimal

as both the siting of the development and landscaping works have been carefully considered, in addition to the use of materials and scale of equipment which aim to respect the surrounding woodland context. Within Policy SP21, the application site is identified as a Historic Park and Garden, one of six within the Local Authority.

- 5.8 In terms of Policy EN3 (Green Wedges), the site is located within the Neath/Tonna/Cimla/Efail Fach green wedge. The proposal is not supportive of inappropriate development, however given the fact that the proposal is looking to secure biodiversity enhancement and mitigate the loss of existing woodland, it could be considered an appropriate form of development. The policy states that proposals in a green wedge are unacceptable *“other than those for certain justified or essential activities that need to be located in the area and small scale extensions”*. The proposed development will encourage an increased numbers of visitors to this area of the Park, and will improve the visitor experience for children in an area that will be inclusive and accessible to all. To summarise, it is considered that the proposed works would not in any way prejudice the openness of the green wedge, therefore the proposal accords with the spirit of Policy EN3 (Green Wedges).
- 5.9 Policy BE1 (Design) advocates high quality design of proposals that take into consideration the existing environment to create beautiful places and spaces. This policy recognises the importance of the proposed development fitting in with the current character of the site, whilst considering its impact on the surrounding areas. Moreover, the design should factor in accessibility for all users, create an attractive and safe place for visitors and use materials that match the characteristics of the site.
- 5.10 It can be confirmed that the proposal aligns with Policy BE1 (Design), with all the following measures proposed as part of the development:
- It complements the character and appearance of the site;
 - The design of the scheme takes into consideration the existing context;
 - There will be no detrimental impact on highway safety;
 - Ecological enhancements are proposed as part of this application;
 - Natural surveillance is encouraged

Impact on Visual Amenity

- 5.11 The proposed development has been designed to have minimal impact upon the wider visual amenity of the Park. As previously mentioned, the site will be well-screened and won't conflict with the character and appearance of the Park. The proposal complies with

Policy BE1 (Design) as careful consideration has been given to the *"siting, design, appearance, massing and scale to minimise any visual intrusion and where appropriate enhance the visual aspects of the area"*.

Access Considerations

- 5.12 The proposed play area is designed to be inclusive and accessible, with pathways and equipment that accommodate children with different abilities. The play area itself is easily accessible off the main footpath which loops around the Fishpond.
- 5.13 As previously mentioned, the site lies in a sustainable location that can be accessed via bus. The nearest bus stop lies just before the main entry to the site along Fairyland. This stop is serviced by the 153 on a two hour basis, terminating at Neath bus station. Neath Train Station is less than a ten minute drive from the application site and receives a frequent service from both Transport for Wales and Great Western Railway. Running to the north of the site is national cycle route 47 which goes from Newport to Fishguard and forms part of the Celtic Trail West. As a result of the above, the proposal is considered to align with Policies SP1 (Climate Change) and BE1 (Design).

Other Material Considerations

Trees

- 5.14 The submitted tree report states there are 5 tree areas contained within the application site which are all classified as Category C, however there is a mixture of B, C and U category trees within those areas. The removal of 1400m² of understorey scrub and tree saplings are required in areas of A1 and A5 as shown in the Tree Survey Plan.
- 5.15 In terms of recommendations within the report, protective fencing needs to be erected around the root protection zones prior to any work on site. The report advises that the trees should be inspected for any protected species, and that any form of hard surfacing construction within root protection zones is ill-advised. Moreover, tree species planting is recommended as part of the development. Detail concerning proposed tree species planting can be found in the Planting Plan produced by Davies Landscapes (Drawing Ref: 2080-DLA-07-DR-L-S3-3002-P03). Should all recommendations be carried out from the report, the development is not deemed to have any negative effect on retained trees. From a policy perspective, LDP Policy EN7 (Important Natural Features) is pertinent to this material consideration. In summary, the development won't adversely affect all existing trees as all efforts will be made to retain them, and no tree requiring removal is a Category A. As noted in the next section, mitigation for those trees lost will be provided as additional trees will

be planted on the development site. Having considered the above, the proposal is compliant with Policy EN7.

Ecology and Green Infrastructure

5.16 The Ecological Assessment has concluded that the entire site consists of broad-leaved semi-natural woodland. The proposed area of woodland removal won't affect any substantial areas of vegetation supporting key foraging resources. The report advises that works should occur outside the bird nesting season (between March and August inclusive). If this cannot be achieved, the trees will need to be the subject of a nesting bird check. The site is not considered to support roosting bats, dormouse or badgers.

5.17 In terms of biodiversity enhancement the following measures are proposed:

- Installation of bird and bat boxes on trees;
- Removal of Montbretia and Himalayan Balsam;
- Management of the existing woodland; and
- Thinning out of trees to allow some to remain mature.

The above measures have also been captured within the Green Infrastructure Plan produced by Davies Landscapes, which confirms the proposal complies with Planning Policy Wales Edition 12 Chapter 6.

5.18 As no further survey work is necessary and a set of ecological enhancements have been proposed, the scheme is compliant with Policies SP15 (Biodiversity and Geodiversity) and EN7 (Important Natural Features). The proposal will protect, conserve, enhance and manage *"Important habitats, species"* as noted in Policy SP15, whereas the development won't *"adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds"* which is requested as part of Policy EN7. Measures have been put in place to protect existing trees, where possible, and mitigation is proposed for the area of woodland to be lost as part of the development.

Archaeology

5.19 A neutral to slightly adverse effect has been highlighted for the proposed application site due to potential groundworks associated with the play area in close proximity to GP05 (Harle Lane Road), GP44 (Coal Pits) and GP45 (Banks). Nevertheless, these sites may lie beyond the areas to be affected by associated groundworks. The groundworks are presumed to be minimal, and restoration of the formal cascade will result in a positive impact. From a policy perspective, the proposal accords with Policy SP21 (Built Environment and Historic Heritage) by safeguarding the existing historic significance of the site.

Ground Investigation and Coal Mining Risk

- 5.20 A Coal Mining Risk Assessment has been produced which assesses the risk associated with the application site. The report advises that the mining hazard below the site should be investigated further. The mine shaft needs to be investigated to find its depth and diameter, and once discovered at least one rotary drillhole should be constructed through the shaft. Depending on the results of the shaft investigation, further rotary boreholes may be required to investigate for shallow mine workings.
- 5.21 Following on from the Risk Assessment, Jubb produced a Ground Conditions Assessment Report which revealed that the site is of low risk and that only one coal mine entry 30 metres away from the application site was of interest. The report advises that the mine entry data sheet is obtained for this and a visual inspection of the location is undertaken as part of any further works. Having considered the above, the proposal accords with LDP Policy M1 (Development in Mineral Safeguarding Areas).

Conclusion

- 6.1 This planning statement has been prepared on behalf of The Head of Property and Regeneration at Neath Port Talbot County Borough Council (NPTCBC) for the proposed construction of a woodland play area and associated works at Gnoll Estate Country Park, Fairyland, Neath, SA11 3BS. This application forms part of a series of works proposed at Gnoll Park as part of a Levelling Up Funding programme.
- 6.2 The proposed play area will include climbing structures and slides, along with a junior area for children aged between two and eight containing soft surfaces and play panels. It will be accessible for all and is located in close proximity to the footpath which circles the Fishpond. A planting plan has been produced to offer screening of the play area from views in the nearby landscape. The proposal will maintain as many trees as possible, and woodland that is lost will be replaced by appropriate native planting.
- 6.3 The impact upon the registered Park and Garden has been considered as part of the application. The impact upon the Park is set to be positive, as it will provide an enhanced visitor experience for children, offering them a space to enjoy the equipment provided in an accessible and inclusive environment.
- 6.4 This document has demonstrated that the development, as proposed, is compliant with relevant policies contained within the adopted NPTCBC LDP, in particular Policies EN3 (Green Wedges), SP21 (Built Environment and Historic Heritage), and BE1 (Design). In addition to this, the proposal accords with relevant Technical Advice Notes and policies noted within Future Wales and Planning Policy Wales.
- 6.5 Notwithstanding the above, a comprehensive assessment is provided in Section 5 of this statement. Separate supporting documents in respect of material considerations are also included in the application package and highlight the proposal as acceptable in all regards.
- 6.6 As such, it is concluded that the proposal fully accords with both national and local policies. Furthermore, there are no material considerations which would prevent the planning application from being determined in accordance with the relevant planning policy framework. In this respect, it is respectfully requested that Neath Port Talbot County Borough Council consider this planning application favourably and grant planning permission for the proposed development.