



20th December 2024

Claire Hall
NPT CBC

By Email

Dear Claire

**P2024/0301: AFFORDABLE APARTMENT DEVELOPMENT
CAEWERN HOUSE, DWR-Y-FELIN ROAD, NEATH SA10 7RH**

I am pleased to enclose a suite of amended plans and documents in respect of the above application as follows:

Prepared by Spring Design

- Proposed Site Plan (2609 00(03)110 Rev.O)
- Proposed Site Plan Path Widths (2609 00(03)111)
- SuDs Strategy Plan (2609-500 Rev.G)
- Foul Drainage Strategy (2609-502 Rev.D)
- Engineering Levels Plan (2609-505 Rev.E)
- Adoption Plan (2609-530 Rev.B)
- Refuse Vehicle Swept Path Assessment (2609-555 Rev.B)
- Longitudinal Sections (2609-600 Rev.A)

Prepared by Calibro

- Letter of Response
- Transport Statement (22-379-20 Rev.04)
- Internal Layout Swept Path Analysis (20-107 Rev.B)
- Proposed Site Access (20-102 Rev.E)
- Visibility Splays (20-111 Rev.O)

Prepared by Tir Collective

- Landscape Strategy Plan (TC22110 Landscape Strategy v8)
- Green Infrastructure Strategy

Prepared jointly by Tir Collective and Tyler Grange Ecology:

- Landscape Strategy response

The plans and documents respond to the consultation responses and LPA comments as follows:

Highways Comments of 6th December 2024

Comment: *All works to be constructed on the public highway shall be subject to Road safety Audits, stages 1 to 4 in accordance with GG 119 of the Design Manual for Roads and Bridges. Each stage of the Road safety Audit shall be submitted for approval in writing by the Local planning Authority. All issues highlighted at each stage, being addressed to the written approval of the Local Planning Authority within 3 months of that stage of that Road safety Audit has been approved. Please provide the stage 1 and stage 2 reports.*

Response: This is acceptable to the applicant as a condition of the planning permission.

Comment: *In addition to the current plans, a new tactile crossing will be required at the end of the footpath to cross Dwr Y Felin Road, this is due to the desire line of pedestrians to take the shortest route. This will also need to be on a separate drawing not just as an appendix.*

Response: This is shown on the Visibility Splays plan (20-111 Rev.O) prepared by Calibro.

Comment: *Narrowings within the highway will only be allowed for a maximum distance of 10m, with a minimum width of 3.6m to ensure emergency vehicle access. This is currently exceeded in with the current design. The response to highway comments does not justify the current design, our highway design guide standards will need to be adhered to.*

Response: The narrowing has been reduced to less than 10m as evidenced on the attached Proposed Site Plan (2609 00(03)110 Rev.O) and confirmed in the enclosed Letter of Response by Calibro.

Comment: *The entrance road is of 80m before the first parking bay, this is in excess of the required 60m maximum of unrestrained highway in a residential area. Speed control will be achieved by a variety of measures such as, narrowing of carriageway or chicanes. The introduction of a tactile crossing at 60m would not be able to decrease the design speed of the entrance road. Additional measures will need to be considered. This has been addressed within the latest 'Response to highway comments' however this has not been included within the provided 'Proposed Site Plan' drawing. Please provide the technical drawing for review, outside of a report, to ensure dimensions can be scaled correctly.*

Response: The Proposed Site Plan (2609 00(03)110 Rev.O) has been updated to include the narrowing shown on the highways plans, as confirmed in the enclosed Letter of Response by Calibro. Technical drawings have been provided as separate documents.

Comment: *There is a small area of footway next to parking space P1, however there is no suitable crossing point included. This is included within the public right of way drawing within the Transport Statement. Please update on the 'Proposed Site Plan' to show the additional crossing as within Appendix B.*

Response: The Proposed Site Plan (2609 00(03)110 Rev.O) has been updated to include the crossing shown on the highways plans.

Comment: *Please can you clarify the kerb types throughout the scheme. A radius kerb is shown on the drawing, with the footpath continuing in multiple area? There is only one formal crossing point included, this is not sufficient for the scheme.*

Response: The plans have been amended to address the issue of the radius kerb and now show more than 1 formal crossing point.

Comment: *The bin stores should be located where the access is along adopted highway, these should also not require the bins to be wheeled greater than 5m to the refuse vehicle. This distance is required in accordance with the 'Guide to the Council's Waste Collection Service for Developers'.*

Response: The scheme has been amended to ensure that the bin stores are within 5m of the adopted highway as shown on the enclosed plans.

Comment: *A long section of the carriageway is required to show the gradients that will be constructed. Also the gradients for the additional link of footpath are required and tie in details.*

Response: The long section of the carriageway is shown on the Road Longitudinal Section Plan (2609-600 Rev.A) prepared by Spring Design. The gradients of the footpath are shown on Engineering Levels Plan (2609-505 Rev.E) prepared by Spring Design.

Comment: *The auto-tracking provided shows that both spaces 31 and 32 are not able to be accessed and egressed without colliding with the proposed retaining wall. Please reconsider this design.*

Response: The Internal Layout Swept Path Analysis plan (20-107 Rev.B) prepared by Calibro demonstrates that the spaces can now be accessed without conflict with the retaining wall, as confirmed in the enclosed Letter of Response by Calibro.

Comment: *Parking spaces P8-P10, please show how the footpath will be linked here, this should be a dropped vehicular crossing over the footpath. Please also consider the orientation of these spaces as they are not 90° to the highway.*

Response: The orientation of these spaces has been amended and the enclosed plans evidence how the footpath will be linked.

Comment: *The adoption plan covers the pedestrian link to Plas Bryn Rhosyn. It is unclear the extents as there is an additional area of new footpath that has not been included for adoption? There is an existing footpath in this location that is not currently adopted, is this to be reconstructed to ensure that the footpath is constructed to adoptable standards?*

Response: The footpath will be improved, but it is not proposed to offer this up for adoption.

Comment: *A Construction Method Statement needs to be submitted to and approved before the development commences. The approved Statement shall be adhered to throughout the construction period.*

Response: This is acceptable to the applicant as a condition of the planning permission.

Comment: *Within Figure 2.2, the existing bus shelter appears to be relocated, can you confirm that this will be included as part of the scheme.*

Response: This is incorrect. The bus stop is not in the 25m visibility splay and so does not require relocating, as clarified in the enclosed Letter of Response by Calibro.

Comment: *Please provide all the appropriate CAD drawings to be able to check the swept path analysis, for the refuse vehicle and the junction.*

Response: These are enclosed.

Active Travel Comments of 10th December

Comment: The steps proposed at the back of block 4 will result in disabled access being limited at the front of block 4. This is discriminating against disabled visitors. Can a ramp (in accordance with Active Travel Guidance: see DE103) be considered at this location.

Response: An additional bike store has been introduced to the rear of Block 4, and an external level access to the rear of Block 4 is provided to the north-west of this block (in addition to the level access through the block itself). Furthermore, an external level access has been introduced to the south-east of Block 5 (in addition to the level access through the block itself). See Fig.1 below.

Fig.1: Level access around Blocks 3 and 4



Comment: It seems that dropped kerbs and tactile paving are missing, which are necessary for disabled access to the site. These should be included in the plans wherever there are kerbs. For example, please refer to the screenshots below.

Response: These have been included on the latest plans.

Comment: It is unclear why a build out has been proposed at the location shown below. While the buildouts would provide a shorter crossing distance, pedestrians are waiting to cross while traffic would be approaching from both directions with the expectation that they will give way. This will make pedestrians in this location vulnerable to impact by vehicles. Proposed island is also positioned behind parking bay p1 making access to this space difficult. The carriageway in this location is not dimensioned but appears to be extremely narrow. Please remove build out and maintain an informal crossing at this location.

Response: This has been introduced in response to a request from highways officers, and is required for highway safety purposes. The crossing has been relocated to avoid conflict with the parking bay, but the concerns around pedestrian safety are not recognised – the crossing provides an opportunity for pedestrians to cross at a narrower part of the carriageway.

Comment: *Please confirm the widths of all paths, including the existing footway to be retained, and ensure they meet active travel requirements. Below shows one measurement has been put in place. Can this be repeated across all separate path areas.*

Response: These are shown on the Proposed Site Plan Path Widths (2609 00(03)111).

Comment: *Can the widths be confirmed where the proposed highway radius is impeding on the footway? (See below.) The radius has been placed in but no width at the narrowest point, please can this be confirmed?*

Response: These are shown on the Proposed Site Plan Path Widths (2609 00(03)111).

Comment: *Design is proposing to move the bus shelter to provide the required 25m visibility splay. The proposed location of the bus stop does not comply with the ATAG as there is insufficient passing space between the bus stop and the retaining wall. A 3 metre path is required behind the bus stop as shown in DE504 in ATAG.*

Response: This is incorrect. The bus stop is not in the 25m visibility splay and so does not require relocating, as clarified in the enclosed Letter of Response by Calibro.

Comment: *The amount, type and spacing of cycle storage needs to comply with the Active Travel Act Guidance (see table 14.6 below in regard to spacing). Please confirm the spacing.*

Response: The cycle stores have been designed to accommodate cycle parking to the requisite standards, based on a vertical storage solution. The applicant would be happy to accept a condition requiring further details of the storage to be provided for approval in advance of construction works.

Comment: *Some of the cycle parking locations are situated behind buildings. Please can these be relocated to more visible areas to enhance natural surveillance.*

Response: There is no opportunity to provide the cycle storage without significant disruption to the development. The cycle stores are subject to natural surveillance from occupiers of the adjacent properties.

Comment: *For block 4, the location of the bike storage (see screenshot below) requires users to access it via steps. This makes the storage inaccessible for cyclists and is unacceptable from an active travel perspective.*

Response: As identified above, an additional bike store has been introduced to the rear of Block 4, and an external level access to the rear of Block 4 is provided to the north-west of this block (in addition to the level access through the block itself).

Comment: *From block 5 how will the bike racks be accessed without cyclists travelling through the building with their bike?*

Response: As identified above, an external level access has been introduced to the south-east of Block 5 (in addition to the level access through the block itself).

Comment: *For better accessibility, it would be preferable to have a direct walking and cycling link through the site, linking to Heol Llityd.*

Response: This has been discussed in-depth previously and is not possible for reasons of topography, tree cover, third-party land-ownership and the presence of a culvert.

Comment: *Is there plans to have lighting on the site?*

Response: The highway will be adopted and so will require street-lighting. There will additionally be lighting to private communal areas which will need to balance the conservation of protected species against security needs. This can appropriately be addressed through the imposition of a condition.

Ecology Comments forwarded 10th December

Comment: *According to our Tree Surveyor's comments, a total of 24 trees and 4 groups of trees will have to be removed to accommodate this development; a tree replanting scheme of adequate scale must be submitted - the 3 for 1 PPW on this site will equate to a total 70 replacement trees. The newly submitted 'Summary of Amendments' contradicts this by stating: "With regard to tree loss I can confirm that 15 Category A-C tree are being removed as a result of the development, meaning that 45 are required to be planted. We are proposing 46 new trees". The summary also suggests that Category U trees are not trees; we disagree, and from our perspective, dead decaying trees / standing dead wood, is of great biodiversity value and should be compensated for in line with PPW. The applicant needs to show how the required tree planting ratio, as outlined by our tree surveyor, is to be accommodated on/or immediately adjacent to the site.*

Response: This is addressed in the enclosed in the Landscape Strategy response prepared jointly by Tir Collective (Landscape Consultants) and Tyler Grange (Ecologists).

LPA Comments of 10th December

Comment: *I am still not satisfied with your response to the tree replanting 1:3 issue – not necessarily because I will be requiring additional trees to be planted but because your submission doesn't clearly and qualitatively demonstrate the biodiversity net gain without them, and therefore I cannot conclude that the requirements of the policy have been met. I do not accept exclusion of 'U' category trees as PPW12 does not say this. I have asked for a clear developed landscaping strategy which sets out the BNG and sets out the size of initial trees as these need to be sufficiently mature to mitigate for those being lost. Please refer back to my emails of 20 September and 1 October in this regard. The Council's tree officer is requiring 70 new trees be planted therefore Members will want to know the justification for not requiring this which is what the above request seeks to set out.*

Response: This is addressed in the enclosed in the Landscape Strategy response prepared jointly by Tir Collective (Landscape Consultants) and Tyler Grange (Ecologists).

LPA Comments at Meeting of 25th October

Comment: *Concerns raised in respect of the impact of Block 1 on the townscape/neighbour amenity.*

Response: This was addressed through the submission of revised plans for Block 1 on 15th November.

I trust that this satisfactorily addresses all outstanding matters and will enable the application to be reported to January committee.

Yours sincerely



Jon Wilks
Director