

PLANNING STATEMENT

Land off Graig Road, Gellinudd, Rhos, Pontardawe

Prepared by LRM Planning Limited on behalf of Abigail Jones &
Iwan Temblett

March 2025



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DOCUMENT CONTROL

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1 Introduction

- 1.1 LRM Planning has been instructed to prepare this Planning Statement to accompany a full planning application for a proposed four-bedroom dwelling on land off Graig Road in Gellinudd, Rhos, Pontardawe.
- 1.2 This Planning Statement forms part of a suite of drawings and documents produced in support of the proposal. The Planning Statement and accompanying drawings demonstrate the suitability of the site to accommodate the proposed development. The full suite of documents submitted comprises:

DOCUMENT	PREPARED BY	REFERENCE (IF APPLICABLE)
Site Location Plan	Stiwdio C3 Architects	240302 - P01
Existing Site Plan	Stiwdio C3 Architects	240302 - P02 (rev.2)
Proposed Site Plan	Stiwdio C3 Architects	240302 - P03 (rev.4)
Proposed Ground Floor Plan	Stiwdio C3 Architects	240302 - P04 (rev.2)
Proposed First Floor Plan	Stiwdio C3 Architects	240302 - P05 (rev.2)
Proposed Roof Plan	Stiwdio C3 Architects	240302 - P06 (rev.2)
Proposed Elevations 1-2	Stiwdio C3 Architects	240302 - P07 (rev.4)
Proposed Elevations 2-2	Stiwdio C3 Architects	240302 - P08 (rev.3)
Proposed Sections	Stiwdio C3 Architects	240302 - P09 (rev.1)
Proposed Boundary Treatments Plan	Stiwdio C3 Architects	240302 - P11 (rev.3)
Proposed Site Plan with Visibility Splays	Stiwdio C3 Architects	240302 - P12 (rev.3)
Site Sections Plan	Vale Consultancy	20215_200 (rev.1)
Proposed Site Sections Sh1	Vale Consultancy	20215_201 (rev.1)
Proposed Site Sections Sh2	Vale Consultancy	20215_202 (rev.1)

Proposed Site Sections Sh3	Vale Consultancy	20215_203 (rev.1)
Planning Application Forms	LRM Planning	PP-13535297
Planning Statement	LRM Planning	24.117/6 – Mar 2025
Tree Survey	Treescene	06.08.24
Tree Constraints Plan	Treescene	08.2024
Preliminary Ecological Assessment	Ecological Services Ltd	July 2024
Coal Mining Risk Assessment Report	Terra Firma	CMRA-TF-24-364-CA
Drainage Plan	Vale Consultancy	20215_500_r04
Drainage Details	Vale Consultancy	20215_501_r03
Proposed Catchment Area and Flow Exceedance Plan	Vale Consultancy	20215_502_r04
Green Infrastructure Statement	Applicant	'Land off Graig Road, Gellinudd'
Topographical Survey	GDI Design Ltd	GDI-TOPO-CRA-001

- 1.3 The following sections discuss the site and its context; the proposed development; a summary of pre-application discussions; planning policy context; an appraisal of the development; and a conclusion in respect of the application submitted herein.

2 Site description and context

- 2.1 The application site is situated in Gellinudd, Rhos in the County Borough of Neath Port Talbot, and is located off Graig Road, between no. 102 Graig Road to the east and a converted chapel to the west. It is broadly rectangular in shape, tapering to the south, and measures circa 0.06 hectares in area. The site has been maintained so is relatively clear of vegetation. A man-made ditch is located along the western boundary of the site.
- 2.2 The site is set between no. 102 and 104 Graig Road to the east and a converted chapel to the west. To the north the site fronts onto Graig Road/A474, beyond which are dwellings of Lon Catwg, a mid-to-late 20th century housing estate. The nearest houses to the north are set half a storey beneath the road with their side and rear elevations facing the site. There is no physical demarcation of the southern boundary of the site with the land parcel extending and opening up to the south.
- 2.3 The predominant surrounding land use to the north, east and west is residential, with open countryside to the south. There is no established nor consistent residential character within the surrounding area of the site with dwellings varying in style, size and design.
- 2.4 The site is situated 1.5km from Pontardawe town centre and around 1.1km from Rhos community centre. Pontardawe provides various local amenities and services, including supermarkets, primary and secondary schools, GP practices, a chemist and a post office. Rhos is home to a primary school, post office, public house, community centre and other incidental amenities.
- 2.5 The site is well located in relation to bus services with a bus stop located immediately east of the site entrance as well as 120m walking distance east of the site on Graig Road. The stops provide northbound and southbound services on routes 903, 905 and 56 to Neath, Abercraf, Neath College and Cwmtwrch. Neath train station is able to be reached via the 903 service, from where trains run approximately hourly during peak times between Cardiff, Carmarthen, London Paddington and Swansea.
- 2.6 The Welsh Government Development Advice Maps show the site to be within Flood Zone A which is denoted as land that is considered to be at little or no risk of fluvial or coastal/tidal flooding. Though a new Technical Advice Note 15 which reclassified the flood zones is still awaiting a date for its adoption, this has now been postponed, and it is unknown when it will come into force, so the site remains in Flood Zone A. When the updated TAN 15 comes into force, the site will be located outside of any flood zone, which is the equivalent of Flood Zone A.
- 2.7 The site is not within close proximity to any heritage assets including conservation areas, listed buildings, scheduled monuments, or historic parks or gardens.
- 2.8 According to the Authority's website, the application site/ property has the following relevant planning history:

REFERENCE	DESCRIPTION	DECISION
P2012/0647	One detached dwelling and detached garage (outline application with all matters reserved)	Refused 13/09/2013
P2006/1026	Outline planning application – residential	Approved 19/09/2006

3 Proposed development

- 3.1 The proposed development seeks to provide a four-bedroom family home off Graig Road in Gellinudd. The dwelling measures approximately 146sqm and offers a well-proportioned house similar to neighbouring dwellings.
- 3.2 The dwelling measures one-and-a-half storey in height with pitched roof and dormer windows. Also, a timber framed entrance porch is proposed on the front elevation. In terms of material palette, the external walls are to be made of clay facing multi-brick and the roof finished in slate effect tiles, with Velux roof lights. A single storey extension is proposed to the rear accommodating the kitchen and dining area. This is proposed to be finished in horizontal timber cladding with a brick base.
- 3.3 The site is to be accessible from Graig Road, via a shared driveway that accommodates three car parking spaces, two along the side (eastern) elevation of the house, and one along the front, to the north. A patio area is proposed to the rear of the house behind which an area of wildflower seed mix is proposed as well as five new native trees.
- 3.4 The internal layout of the house would comprise of entrance hall, living room, cwtch, pantry, utility, kitchen / dining area and wet room at ground floor level, while provision is made for four bedrooms, en-suite and a family bathroom at first floor level.

4 Pre-application advice

- 4.1 A pre-application advice request was submitted on 17th May 2024 for the *“proposed development of four affordable dwellings, one open market dwelling, access and associated works”*. This was followed by a meeting between LRM Planning, the applicant and Planning Officer Rhodri Griffiths on the 4th June 2024.
- 4.2 The proposal, at the time of the request, included five dwellings and extended south to a wider parcel of land within the ownership of the applicant. Due to the wider parcel of land being located partly outside the settlement boundary and within a designated green wedge, the principle of development was not considered to be acceptable.
- 4.3 Since the pre-application meeting, revised proposals with a single dwelling on the northern area of land, as submitted, were informally shared with the planning officer. The officer considered that the principle of one dwelling, within settlement limits should be acceptable, subject to amenity, highway safety, ecological, and coal mining impact.
- 4.4 Comments from the officer included ensuring that adequate visibility splays were proposed and that they were on land within the control of the applicant. The officer also advised that the surfacing details need to be shown on the plan, and that a 7m vegetated buffer zone should be accommodated to protect habitats associated with the existing ditch along the western boundary of the site.
- 4.5 Regarding the dwelling and its design, the officer recommended that the width of the dwelling should be reduced minimise its visual impact and its potential impact on residential amenity. The officer also commented that the ridge height of the dwelling should have regard for those dwellings either side of the site.
- 4.6 The advice and feedback provided from the officer has influenced the final design vision of the scheme.

5 Planning policy framework

- 5.1 The planning policy context for the determination of this application is provided by national and local planning policy guidance. National guidance is set out within Future Wales, Planning Policy Wales and its accompanying Technical Advice Notes. Local policy comprises the adopted Neath Port Talbot Council Local Development Plan (adopted 2016), and its supporting Supplementary Planning Guidance (SPG) documents.

FUTURE WALES: THE NATIONAL PLAN 2040

- 5.2 Future Wales is the top-tier national development framework, produced by Welsh Government. It is a strategy for addressing key national priorities through the planning system over the next two decades, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems, and improving the health and well-being of our Planning Policy Wales

PLANNING POLICY WALES

- 5.3 Planning Policy Wales (PPW) is the principal national planning policy document which sets out the land use policies of the Welsh Government (WG) against which development proposals should be assessed. The latest version is the twelfth edition, published in February 2024.
- 5.4 The main thrust of PPW is to ensure that the planning system contributes towards sustainable development and improves the social, economic, environmental, and cultural well-being of Wales. Placemaking lies at the heart of PPW, with policy and development management decisions required to seek to deliver development that adheres to these principles.
- 5.5 Figure 4 of PPW covers the Key Planning Principles of WG in seeking to achieve “*the right development in the right place*”. Development proposals must seek to deliver development that addresses these outcomes, albeit paragraph 2.20 recognises that not all of these outcomes can necessarily be achieved under every development proposal.
- 5.6 Paragraphs 3.3 to 3.18 of PPW highlight the importance of good design in “*creating sustainable places where people want to live, work and socialise*”. To achieve good design development, proposals need to meet the five overarching aims of design which comprise of access, character, community safety, environmental sustainability, and movement.
- 5.7 Section 6 of PPW sets out green infrastructure and how it can be integrated into developments, which should be protected and enhanced due to the multi-functional roles. A proactive approach to green infrastructure and biodiversity should be adopted to help reverse the decline in biodiversity and increase the resilience of ecosystems.
- 5.8 Paragraph 6.2 relates to Green Infrastructure and notes that “*at a local scale, [green infrastructure] might comprise parks, fields, public rights of way, allotments, cemeteries and gardens. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.*” Green infrastructure provides multiple benefits for social, economic, and cultural as well as environmental resilience. These benefits are important in domestic environments where they can facilitate health and well-being related benefits.

TECHNICAL ADVICE NOTES

- 5.9 The following Technical Advice Notes (TANs) are of relevance in the consideration of these proposals.

- TAN 12 – Design (2016)

5.10 TAN 12 relates to Design and was updated in March 2016. It provides advice and information on a number of related areas including the definition of design for planning purposes; design considerations in planning decisions; and local planning authority design policy and advice.

WELL-BEING OF FUTURE GENERATIONS ACT

5.11 The Well-being of Future Generations Act imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principles, and to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Its content is sought to be delivered through the planning system via the intertwining of the Act through the new PPW.

LOCAL DEVELOPMENT PLAN

5.12 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. The development plan for the site comprises the Neath Port Talbot Council Local Development Plan (2011-2026).

5.13 The site is within the settlement boundary as defined by the Neath Port Talbot Council Local Development Plan. This site is not subject to any designations. It can therefore be classed as 'white land', whereby the principle of development on this site is acceptable, subject to material planning considerations.

5.14 Policies with a prefix of SP (strategic policies) are overarching policies relating to development in the county borough. Policy SP3 (Sustainable Communities) notes that the delivery of sustainable, healthy and cohesive communities will be promoted by defining sustainable communities and locations for development by a settlement hierarchy that reflects the role and function of settlements. The policy also identifies settlement limits within which development which accords with the settlement hierarchy will be permitted in principle.

5.15 Linked to the above is policy SC1 (Settlement Limits) which confirms development that is proportionate in scale and form to the role and function of the settlement will be acceptable in principle within settlement limits.

5.16 Policy BE1, Design, emphasises the importance that a new development achieves and creates attractive and safe places. It sets out a series of criteria that are sought to be achieved on new development proposals. This includes considerations of character, context, materials, highway safety, local features, security, transport connectivity, use of resources, drainage and layout.

5.17 A summary of the pertinent LDP policies is provided below, listed in the order they appear in the LDP.

LDP POLICY	RELATING TO
STRETEGIC POLICIES	
SP1	Climate Change
SP3	Sustainable Communities

SP6	Valleys Strategy Area
SP15	Biodiversity and Geodiversity
SP16	Environmental Protection
SP21	Built Environment and Historic Heritage
SP22	Welsh Language
TOPIC BASED POLICIES	
SC1	Settlement Limits
EN6	Important Biodiversity and Geodiversity Sites
TR2	Design and Access of New Development
BE1	Design
WL1	Development in Language Sensitive Areas

SUPPLEMENTARY PLANNING GUIDANCE

5.18 In addition to the above policies, the following SPGs are considered of relevance to this application:

- Biodiversity and Geodiversity (May 2018);
- Parking Standards (October 2016); and
- Design (July 2017).

6 Appraisal

OVERVIEW

- 6.1 This section of the Planning Statement aims to identify the main issues relevant to the determination of the application and seeks to assess the scheme against the pertinent considerations.
- The **principle of the development** of this site in land use policy terms;
 - The **design** of the proposed development including layout, scale, character, materials and access;
 - The impact on **trees** and **landscaping**;
 - The impact of the proposed development in respect of **biodiversity**;
 - The proposed **access** and vehicle **parking** requirements; and
 - The **sustainable drainage** features of the site.

PRINCIPLE OF THE DEVELOPMENT

- 6.2 The principle of the development is acceptable due to the location of the site within the settlement limit of Gellinudd and the residential nature of the site context. Additionally, despite the small nature of the site, it provides a valuable contribution towards wider housing need of Neath Port Talbot (NPT). The Annual Monitoring Report (AMR) (October 2023) identifies that the delivery of housing across NPT falls behind annual target set out in the Local Development Plan with only 41% of the cumulative annual target having been delivered to date. This further establishes the principle of development.
- 6.3 The overriding principles of PPW are considered to be met. In this respect, a site within the settlement boundary is being made use of in order to provide housing in sustainable location. It provides adequate access to the local centre, bus routes and rail services when travelling further afield is necessary. Thus, the location of the proposal supports PPW's vision where walking, cycling and public transport are prioritised and positively integrated within a scheme. The principle of the proposal therefore complies with key objectives related to health and well-being, sustainability and climate change.

DESIGN OF THE DEVELOPMENT

- 6.4 Stiwdio C3 have designed a bespoke high-quality dwelling in respect of its design and contribution to the built form and surrounding landscape. Through a thorough assessment of the site and surrounding context and a detailed process of design development, Stiwdio C3 evolved the design taking on board the advice and comments received from the Local Planning Authority.
- 6.5 The final design is considered to positively respond to the pattern, grain and density of development within the immediate vicinity. To the west, the garden of the new dwelling and suitable boundary treatments, will function as a buffer between the new dwelling and the converted chapel ensuring an acceptable distance between the two. This will also prevent any overlooking and any sense of overdevelopment. The dwelling has a blank façade facing the converted chapel therefore there are no overlooking concerns. Similarly, to the east, the new dwelling and no. 102 Graig Road are separated by their respective driveways and boundary treatments which will prevent any amenity issues arising. Consideration of the space between the proposed and existing dwellings demonstrates compliance with policy BE1 of the LDP.
- 6.6 There is no single distinct character style of dwellings in the site vicinity. Moreover, the vicinity of the site is characterised by its assortment of dwelling types, in terms of form, scale and finishes,

resulting in it not being possible to read the streetscape as a single entity. Notwithstanding this, the development is to be one-and-a-half-storeys in height, reflecting the local context in terms of residential scale. The dwellinghouse itself is to be set back with the plot to respect the existing building line of Graig Road, and will therefore, comply with policy BE1 of the LDP, with the design responding to the context of the site and its setting in terms of building heights, plot widths and setback.

- 6.7 The internal layout and main outlook of the new dwelling has been designed and orientated to have a relationship with Graig Road with the timber framed porch main entrance proposed on the front elevation. The development of a new dwellinghouse supports the role, function and character of Gellinudd as a residential settlement.
- 6.8 The new dwellinghouse is to adopt a material palette comprising mostly of clay facing multi-brick, which will be supplemented with other materials including timber, slate effect tiles and glass. The incorporation of timber and brick will create a strong, yet traditional character. The combination of the proposed materials is considered to comply with the overarching sustainable design principles of LDP policy BE1 and the Design SPG and paragraph 3.7 of PPW, as referenced above.

TREES AND LANDSCAPING

- 6.9 The site includes a group of Category B trees, which denotes trees with a life expectancy of over 40 years, along southern portion of the western boundary, and two category C trees, which are those with a life expectancy of between 20-40 years, within the southern section of the site. The site is also bound by a group of category C trees to the south-east. The site layout requires the removal of one category C tree which will be replaced by five native trees in accordance with Welsh Government policy on green infrastructure and biodiversity enhancement.
- 6.10 The proposal also maintains a distance from the green edges to retain biodiversity in the south and west of the site, as well as the retention of the group of category B trees which are prominent boundary trees forming significant linear landscape feature. The design as shown would be respectful of the edge of settlement setting of the site, ensuring retention and enhancement of green infrastructure is prioritised.

BIODIVERSITY

- 6.11 The site has recently been cleared and now only some scrub and arisings remain on the vacant site. The site was also cleared some 10 years ago and consisted mainly of scrub and very little mature growth. The Preliminary Ecological Appraisal ("PEA") confirms that the development site comprises mainly short perennial vegetation. It also identifies that a ditch is present along the western boundary. This has been created by the site owners to allow for drainage of the site. The ditch is choked with tall ruderal vegetation and bramble.
- 6.12 The PEA also confirms that there are no records of Bats, nesting Birds, Great Crested Newts, Otters, Badgers or Dormouse on site. However, precautionary measures are advised including a wildlife friendly lighting strategy to prevent light spill onto retained vegetation and adjacent habitat. A site design which demonstrates habitat connectivity, and a wildlife sensitive lighting strategy is recommended. Additionally, a precautionary approach to the removal of habitat will be followed to protect any species that may be present. Compensation measures for the loss of bird foraging and nesting habitat will also be delivered in the form of bird boxes.
- 6.13 Regarding reptiles, the survey confirmed that the ditch line along the western boundary of the site is not suitable for breeding use by reptiles. It is however, considered to be suitable for use by reptiles and amphibians during their terrestrial life stages. Given the adjacent, suitable habitat for reptiles to use, reptile surveys were not recommended. Instead, a reptile mitigation strategy will be used to naturally encourage reptiles out of the development site. Accordingly, the development accords with LDP policy SP15.

ACCESS AND PARKING

- 6.14 The site is to be accessed via Graig Road, with a new access point proposed along the northern boundary of the site. This has been designed following advice from a transport consultant. The access achieves the required 2.4m x 45m visibility splay in both directions within the land owned by the applicant or the highway land, based on a 20mph speed limit as required by TAN18. Pedestrian visibility splay requirements are met, and a standard detail of the footway crossover will be provided.
- 6.15 Three vehicular parking spaces are proposed to serve the site. There is sufficient manoeuvring space within the site curtilage to ensure that a car is able to leave the site in a forward gear. The Parking Standards SPG dictates that for houses, one space is required per bedroom, up to a maximum of three spaces. Accordingly, the provision of three spaces to serve the new dwellinghouse accords with local parking standards

SUSTAINABLE DRAINAGE

- 6.16 The development proposes to utilise sustainable drainage methods to manage the surface water from the entire site. This will be in the form of below ground cellular storage, providing amenity and biodiversity benefits. An application will be made to the Sustainable Drainage Approving Body (SAB) in due course. Foulwater is proposed to be discharged into the existing public sewer.

7 Conclusion

- 7.1 This Planning Statement has been produced in support of the proposal for a new dwellinghouse on land off Graig Road, Gellinudd.
- 7.2 The principle of the development is considered to have been established by nature of the sustainable location of the site within the settlement boundary. The design facets proposed are befitting of the location of the site and design has been carefully considered to ensure minimal impact on existing residents and is considered to make a positive impact on the character and appearance of the streetscene.
- 7.3 The proposals have been subject to pre-application discussions between the applicant and the Local Authority. During these discussions, the response has been positive in terms of principle and approach, with suggested amendments heeded in the finalising of the proposal. Amenity of existing and future residents has been carefully considered with the design, as well as windows and boundary treatments ensuring that no amenity concerns arise.
- 7.4 Though the removal of one tree is required, the retention of the majority of trees alongside new planting proposals and ecological mitigation in the form of bird boxes more than compensates for the losses.
- 7.5 Wellbeing goals of the Well-being of Future Generations Act are considered to be adhered to through this application in that there would be no significant or unacceptable impacts upon the achievement of wellbeing objectives as a result of the application being approved and development being carried out. By a similar token, the aspirations of the PPW, which mirrors the well-being goals, are followed under these proposals.
- 7.6 In conclusion, it is considered that the proposal offers an opportunity to provide a high-quality family home in a sustainable location. The site accords with sustainable development principles through its location within the settlement boundary. The development is considered to be a suitable addition and an improvement on the existing unkempt site. On this basis, it is considered that the full planning application is one Neath Port Talbot County Borough Council is in a position to support.

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