

Our Ref: IR/PB/S25.130

Date: 31st March 2025

Neath Port Talbot County Borough Council,
Development Control Section,
The Quays,
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Neath,
SA11 2HZ

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Dear Sir or Madam,

Town and Country Planning Act 1990
Full planning permission for erection of mesh fence
Land at Heathland Way, Coed Darcy, Llandarcy, SA10 6FF
Planning Portal Reference: PP-13826769

Asbri Planning is appointed as planning agent to Beacon Cymru Group in respect of the above planning application for erection of mesh fence at land at Heathland Way, Coed Darcy, Llandarcy, SA10 6FF.

The planning application has been submitted via Planning Portal and the submission documents are listed below.

The following drawings are submitted, prepared by Spring Design.

Drawing name	Drawing reference
Site Location Plan	N/A
As Built Security Fencing Layout	2432-800-B

In addition, the supporting documents submitted comprise the following:

Document name (reference where appropriate)	Prepared by
Planning application forms (1APP)	Asbri Planning
Planning Letter including Green Infrastructure Statement	Asbri Planning

In addition, payment of the £315 application fee will be made to Neath Port Talbot County Borough Council.

Site Description

The application site lies to the south of Heathland Way, a road situated within the residential development at Coed Darcy, Llandarcy. The site is located within a new residential development constructed within the past 15 years, and lies in close proximity to Neath Town Centre and Swansea City Centre. The site occupies a sustainable position and has strong links with the M4 motorway. Nearby facilities include gym, restaurant, café and college.

Within the adopted Natural Resources Wales (NRW) Development Advice Map (DAM), the site is located within Flood Zone A and is therefore not at risk of any flooding. The NRW Flood Map for Planning (FMP) indicates the site lies outside Flood Zones 2 and 3 and therefore is unlikely to flood.

The site does not lie within a Coal Mining Development High Risk Area, and there are no heritage assets contained within or in the immediate vicinity of the site.

The adopted Local Development Plan (LDP) Map indicates the site lies within settlement limits of Llandarcy. The site is also located within a Housing Allocation, Strategic Regeneration Area and Strategic Employment Site.

Planning History

A search of the Neath Port Talbot County Borough Council website reveals the site has extensive planning history, although no application has been submitted for the site since 2020.

Proposed Development

The proposal comprises the erection of a 1.8 metre mesh fence which will be circa 250 metres long. The applicant is proposing the Eclipse, V Mesh Profiled Fencing System which has been installed within other areas of the development at Coed Darcy.

Planning Policy

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 Well-being of Future Generations (Wales) Act 2015 plays a significant role in shaping the planning system in Wales, embedding sustainable development principles into planning policy and decisions. The Act reinforces the planning system’s shift towards a holistic, sustainable approach, emphasising that planning in Wales must consider not just present needs but also the well-being of future generations.

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 comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021); and
- Neath Port Talbot County Borough Council Local Development Plan (January, 2016).

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; and
- Neath Port Talbot County Borough Council Supplementary Planning Guidance

The Development Plan

The development plan comprises Future Wales and the Neath Port Talbot County Borough Council Local Development Plan (January, 2016).

National Development Framework: Future Wales – The National Plan 2040

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.

Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Pages 54-56 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

Growth Strategy

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; and
- Wrexham and Deeside

It is further explained that *"Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources"* (page 60).

The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows: *"Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being"* (page 60).

Placemaking

Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that *"Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration"*.

Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following: *"The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres"*

and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*
- *integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment."*

Further detail on the Welsh Government's strategic placemaking priorities is set out at Page 66 of Future Wales. Key placemaking principles are summarised below:

Mix of uses

To create activity throughout the day and enable people to walk and cycle, rather than being reliant on travelling by car, places should have a rich mix of residential, commercial and community uses within close proximity to each other. Urban growth and regeneration should integrate different uses within neighbourhoods.

Variety of housing

To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.

Walkable scale

To enable active and healthy lives, people should be able to easily walk to local facilities and public transport. Urban growth and regeneration should be focused within inner city areas and around town centres, as well as around mixed use local centres and public transport. Co-working hubs offering an alternative to home-working are an important feature of the economy, and these should be located in town and local centres.

Density

To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. It may be necessary to take social distancing requirements into consideration when designing public and communal spaces.

Street network

To provide a framework for different uses and types of housing to be integrated within neighbourhoods, urban growth and regeneration should be based on a network of streets that enable social distancing if necessary. The street network should be permeable, with streets primarily connecting at both ends with other streets and providing links into, out of, and through places. The street network should have a hierarchy, with streets that have different characters and functions.

Plot-based development

To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and

local builders, urban growth and regeneration should provide opportunities for the development of small plots. A plot-based approach to development should be promoted, including the subdivision of larger sites to be built in small plots or as a group of plots.

Green infrastructure

To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration. Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated.

Biodiversity and Green Infrastructure

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).

In addition to this, the associated importance of green infrastructure is highlighted: “*As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being*” (page 78).

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.*

National Growth Area

Swansea Bay and Llanelli are the key focus for growth and investment in the South West region of Wales as outlined in policy 28 of Future Wales. The policy states that “*Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The Welsh Government will work with regional bodies and local authorities to promote and enhance Swansea Bay and Llanelli’s strategic role and ensure key investment decisions support places in the National Growth Area and the wider region*”.

Local Level

The Neath Port Talbot LDP was adopted in January 2016 and comprises part of the prevailing development plan for the area.

The following Local Development Plan policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
SP1	Climate Change
SC1	Settlement Limits
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
BE1	Design

National Policy and Guidance

Planning Policy Wales Edition 12

Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW 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.

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"*.

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"*.

Good Design

The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW where it is stated that *"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"*.

Good design must enable development proposals to address the issues of inclusivity and accessibility for all, and it is highlighted at Paragraph 3.6 that *"This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport"*.

In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals - Paragraph 3.7 states for example that *"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"*.

The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8: *"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”.

Paragraph 3.9 revolves around character, stating that *“The special characteristics of an area should be central to the design of a development. 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”.*

In terms of community safety, Paragraph 3.11 notes that *“Local authorities are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities well-being goal”.*

Green Infrastructure

The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.11 that *“The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes”.*

Paragraph 6.2.12 confirms that *“A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied”.*

The Step-Wise Approach discussed at paragraph 6.4.15 confirms that the first priority for planning authorities is to avoid damage, if that is not possible then there is a requirement to minimise, mitigate, compensate on site, and then only as a last resort off-site compensation for unavoidable damage must be provided.

Technical Advice Notes

The following Technical Advice Notes (TANS) are of relevance to the proposed development:

TAN 5 Nature Conservation and Planning (2009) provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.

TAN 12 Design (2016) provides advice on design considerations and states that development should aim to:

- *Create places with the needs of people in mind, which are distinctive and respect local character*
- *Promote layouts and design features which encourage community safety and accessibility*
- *Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles*

- *Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building*
- *Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards*
- *Secures the most efficient use of land including appropriate densities*
- *Consider and balance potential conflicts between these criteria*

Local Planning Authority Supplementary Planning Guidance

The following Supplementary Planning Guidance (SPG) adopted by Neath Port Talbot County Borough Council is of relevance to the proposed development:

- Biodiversity and Geodiversity (May, 2018).
- Design (July, 2017).

Appraisal

As stated above, 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 Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.

The key material planning considerations are as follows:

- The principle of development;
- Visual and residential amenity; and
- Green infrastructure

The principle of development

This application seeks planning permission for erection of mesh fence at land at Heathland Way, Coed Darcy, Llandarcy, SA10 6FF. The open mesh design of the fence and its green colouring are specific design features which seek to reduce its visual impact within the site. The design allows the existing green landscaping features associated with the application site to retain their visibility through the fence where applicable. The principle of development is considered acceptable, with the exact same fence installed across other areas of the site. In summary the proposal accords with LDP Policies SC1 (Settlement Limits), BE1 (Design) and the Design SPG.

Visual and residential amenity

The proposed fence is not considered to a detrimental effect on visual amenity. The proposed fence will only be 1.8 metres tall and is installed across other areas of the Coed Darcy residential development. The fence is considered to be located in close proximity to some of the occupied properties, however the overall benefit of the fence and its moderate scale is deemed to override these concerns. In summary, the proposal complies with LDP Policy BE1 (Design) and the Design SPG.

Green Infrastructure

Paragraph 6.21 of Planning Policy Wales defines green infrastructure as *"the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, ponds, natural green spaces, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems."*

At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.

The Environment (Wales) Act 2016, provides a context for the delivery of multi-functional green infrastructure. Its protection and provision can make a significant contribution to the sustainable management of natural resources, and in particular to protecting, maintaining and enhancing biodiversity and the resilience of ecosystems in terms of the diversity within and connections between ecosystems and the extent and condition of these ecosystems, so that they are better able to resist, recover from and adapt to pressures. This means that the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty under the Environment (Wales) Act 2016.

The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes.

The DECCA Framework and Net Benefits for Biodiversity: The DECCA framework is used for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act. These are: Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience. A summary of the definitions is described below:

- *Diversity: maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits.*
- *Extent: incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance.*
- *Condition: The condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer term types of disturbance. Both direct and wider impacts should be considered, for example avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect etc.*
- *Connectivity: This refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural resources. Developments should take opportunities to develop functional habitat and ecological networks within and between ecosystems, building on existing connectivity.*
- *Aspects of ecosystem resilience (adaptability, recovery and resistance): ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.*

Paragraph 6.4.11 of Planning Policy Wales states that *"planning authorities must follow a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact."*

The development won't have any detrimental impact upon green infrastructure as the applicant is only seeking to erect a mesh fence. It is considered that this proportional Green Infrastructure Statement which has been undertaken following the Step-Wise approach advocated in Planning Policy Wales has evidenced that the proposed

development is respectful of existing green infrastructure assets, and seeks to avoid impact as much as possible. The proposal is considered to achieve NBB by following the Step-Wise Approach. Given the nature of the proposals, and the context of the application site and streetscene, it is not considered reasonable or necessary to require a form of ecological enhancement, in this particular instance.

In light of the above, it is considered that the proposed development is in accordance with LDP Policies EN6 (Important Biodiversity and Geodiversity Sites) and EN7 (Important Natural Features) in addition to the Biodiversity and Geodiversity SPG.

Conclusion

This planning letter has been prepared on behalf of Beacon Cymru Group to accompany a full planning application for erection of mesh fence at land at Heathland Way, Coed Darcy, Llandarcy, SA10 6FF. The principle of development is considered acceptable, and there is precedent for the type of mesh fencing proposed across the wider Coed Darcy residential development. Furthermore, the proposal won't result in any detrimental impact upon visual/residential amenity and green infrastructure.

The proposals therefore comply with the relevant national and development plan planning policies and supplementary planning guidance. Furthermore, there are no material considerations which would prevent the planning application from being determined in accordance with the relevant planning policy framework. It is for these reasons that it is respectfully requested that Neath Port Talbot County Borough Council grant planning permission for the proposed development.

I trust that the submitted documents allow the application to be validated and look forward to receiving details of the name of the case officer, application reference number and target determination date. If you have any queries in the meantime, please do not hesitate to get in touch.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Rowlands', with a horizontal line underneath.

Iwan Rowlands
Planner
Asbri Planning Ltd