

PRE-APPLICATION CONSULTATION REPORT

**LAND NORTH OF CRYMLYN PARC
SKEWEN**

February 25



Summary

Proposal

Outline Planning Application for the Development of up to 153no. Homes

Location

Land North of Crymlyn Parc, Skewen, Neath

Date

February 25

Project Reference

S24.149

Client

Hale Group and Pobl Group

Product of

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Responses received from community consultees

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Responses received from specialist consultees

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Responses received from 'other' consultees

Introduction

- 1.1 Asbri Planning have been instructed by Hale Group and Pobl Group to undertake a Pre Application Consultation (PAC) and prepare a subsequent report in respect of the proposed Outline Planning Application for the Development of up to 153no. Homes at Land North of Crymlyn Parc, Skewen, Neath.
- 1.2 Asbri Planning have been instructed by Hale Group and Pobl Group to prepare a Pre Application Consultation Report (PAC) in respect of the proposed outline planning application for the development of up to 153no. homes.
- 1.3 In accordance with Part 1A of The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 ("the 2016 Order"), all major developments are required to be subject to pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority.
- 1.4 The 2016 Order confirms that any 'Pre-Application Consultation' exercise would be required to undertake the following steps prior to compiling the PAC Report;
 - Undertake publicity before application for Planning Permission (Section 2C)
 - By displaying a site notice (Schedule 1B) in at least one place on or near the land to which the proposed application relates for not less than 28 days;
 - By serving notice (Schedule 1B) to any owner or occupier of any land adjoining the land to which the proposed application relates; and
 - By making a draft valid planning application information available publicly for no less than 28 days. As per the guidance, when this takes the form of a webpage where the requisite information is freely available, the applicant must advertise a local library where residents are able to access the documents online.
 - Consult before applying for Planning Permission (Section 2D)
 - By serving notice (Schedule 1B) on community consultees; and
 - By serving notice (Schedule 1C) on specialist consultees.
- 1.5 Section 2E places a duty placed upon specialist consultees to provide a substantive response to pre-application consultation within 28 days.
- 1.6 This PAC Report has been prepared in accordance with Part 1 Section 2F of the 2016 Order and demonstrates how the applicant has;
 - Complied with Section 61Z of the Town and Country Planning Act 1990 (as amended) ("the 1990 Act");
 - Responded to consultations received from any person consulted under Section 61Z (3) or (4) of the 1990 Act; and
 - Taken account of the responses received.
- 1.7 In accordance with section 2F(2) this report includes;
 - a) A copy of the site notice and a plan showing its locations;
 - b) A declaration that the site notice was displayed in accordance with the 2016 Order;
 - c) A list of the addresses of adjoining land owners or occupiers;
 - d) Copies of all notices given to community consultees;
 - e) Copies of all notices given to specialist consultees;

- f) A summary of all issues raised in response to the statutory publicity, including confirmation of whether the issues raised have been addressed, and, if so, how;
- g) A summary of all issues raised by community and specialist consultees, including confirmation of whether the issues raised have been addressed, and, if so, how;
- h) Copies of all responses received from community and specialist consultees.

1.8 The statement confirms how the consultation has been publicised at section 2, whilst section 3 confirms which consultees have been consulted as part of this PAC. Sections 4 provides a summary of the responses received to the statutory publicity and provides a response to the comments. Section 5, 6 & 7 outlines the responses received to the consultation with Community, Specialist and 'Other' consultees and provides a response to each comment. The report concludes at section 8.

Statutory publicity before applying for planning permission

2.1 In accordance with Section 2C of the 2016 Order, the applicant has undertaken appropriate publicity by way of:

- Displaying a site notice for a period of no less than 28 days from the 8th November 2024 to the 6th December 2024 inclusive. A copy of the site notice is contained at Appendix A. Asbri Planning hereby declare on behalf of Hale Group and Pobl Group that the Site Notice was displayed in at least one place on or near the development site therefore the provisions of Section 2(C)(1)(a)(i) of the 2016 Order have been complied with;
- Giving requisite notice to owners/occupiers of any land adjoining the application site. A list of the identified adjoining land owners and a draft notice is contained in Appendix B.
- Made the full draft planning package available for inspection on Asbri Planning's website from the 8th November 2024 until the 6th December 2024 inclusive. Computer facilities were identified to view the application at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday).
- The following plans and documents were made available for inspection as show on the screenshot provided at Appendix C.

Table 1: list of proposed plans

Plan title	Drawing reference
Site Location Plan	2285 - 00(03)103
Illustrative Masterplan	2285 - 00(03)102E
211 Floor Plans	2285-211(03)200
211 Elevations	2285-211(03)300
212 Floor Plans	2285-212(03)200
212 Elevations	2285-212(03)300
213 GF Floor Plans	2285-213(03)200
213 FF Floor Plans	2285-213(03)201
213 SF Floor Plans	2285-213(03)202
213 Front & Side Elevations	2285-213(03)300
213 Rear & Side Elevations	2285-213(03)301
214 Floor Plans	2285-214(03)200
214 Front & Side Elevations	2285-214(03)300
214 Rear & Side Elevations	2285-214(03)301
421 Floor Plans	2285-421(03)200
421 Elevations (Brick)	2285-421(03)300
421 Elevations (Render)	2285-421(03)301
531 Floor Plans	2285-531(03)200
531 Elevations	2285-531(03)300
532 Floor Plans	2285-532(03)200
532 Elevations	2285-532(03)300
641 Floor Plans	2285-641(03)200
641 Elevations (Render)	2285-641(03)300
641 Elevations (Brick)	2285-641(03)301
642 Floor Plans	2285-642(03)200

642 Elevations (Render)	2285-642(03)300
642 Elevations (Brick)	2285-642(03)301
Howard Floor Plans	2285-HOW(03)200
Howard Elevations	2285-HOW(03)300
Letchworth Floor Plans	2285-LET(03)200
Letchworth Elevations	2285-LET(03)300
Oakdale Floor Plans	2285-OAK(03)200
Oakdale Elevations	2285-OAK(03)300
Rhiwbina Floor Plans	2285-RHI(03)200
Rhiwbina Elevations	2285-RHI(03)300
Proposed Drainage Strategy	C1600-C-SK03 Rev.E
Proposed Layout Plan	C1600-C-SK04 Rev.C
Vehicle Tracking Sheet 1 of 2	C1600-C-SK14
Vehicle Tracking Sheet 2 of 2	C1600-C-SK15
Landscape Strategy (07.11.2024)	TC24246 LA1 v4
Planting Strategy (07.11.2024)	TC24246 LA2 v4
Play Strategy (07.11.2024)	TC24246 LA3 v4
Topographical Survey 1 of 3	-
Topographical Survey 2 of 3	-
Topographical Survey 3 of 3	-
Perspective 1	-
Perspective 2	-
Perspective 3	-
Perspective 4	-
Perspective 5	-
Perspective 6	-
Perspective 7	-
Perspective 8	-
Perspective 9	-

Table 2: list of Documents

Document	Author
Application Forms	Asbri Planning
Planning Statement	Asbri Planning
Design and Access Statement	Spring Design
Transport Assessment	Acstro
Tree Survey	ArbTS
Noise Survey	Acoustic Consultants Ltd
Ecological Surveys	Hawkeswood Ecology
Green Infrastructure Statement	Tir Collective
Drainage Strategy	CB3 Consult
Site Investigation	Terra Firma
Waste Management Plan	Hale Group
Air Quality Assessment	Air Pollution Services

- 2.2 Any person who wished to make representations about the proposed development must have completed a Consultation Response Form, either online or as a hard copy, and issued to the agent by the 6th December 2024.

Consultation before applying for planning permission

- 3.1 In accordance with Section 2D of the 2016 Order, the applicant has undertaken consultation with all community and specialist consultees.

Community Consultees (Schedule 1B)

- 3.2 The applicant has undertaken consultation with the following community consultees;

Table 3: Community Consultees

Consultee	
Councillor Helen Ceri Clarke	cllr.h.c.clarke@npt.gov.uk
Councillor Cen Phillips	cllr.c.phillips@neath-porttalbot.gov.uk
Councillor Mike Harvey	cllr.m.harvey@npt.gov.uk
Councillor Alyson Anthony	cllr.alyson.anthony@swansea.gov.uk
Councillor Nathan Goldup-John	cllr.n.goldup-john@neath-porttalbot.gov.uk
Councillor Angharad Rebecca Aubrey	cllr.a.r.aubrey@npt.gov.uk
Town Council Louise Thomas	admin@coedffranc-tc.gov.uk
Adjoining Councillor Ryland Doyle	cllr.ryland.doyle@swansea.gov.uk
Adjoining Councillor Matthew Jones	cllr.matthew.jones@swansea.gov.uk
Adjoining Councillor Penny Matthews	cllr.penny.matthews@swansea.gov.uk

- 3.3 A copy of all notices issued to community consultees is contained within Appendix D.

Specialist Consultees (Schedule 1C)

- 3.4 The applicant has undertaken consultation with the following community consultees;

- Adjoining Local Planning Authority
- Cadw
- The Coal Authority
- Rail Network Operator
- Fire and Rescue Service
- Dwr Cymru/Welsh Water
- NRW
- Health and Safety Executive
- Welsh Government – Agricultural Land Classification
- Welsh Government – Trunk Road Agency
- The Canal and River Trust
- Local Highway Authority

- 3.5 A copy of all notices issued to specialist consultees are contained within Appendix E.

Other consultees

- 3.6 The client has gone beyond the requirements of the 2016 Order and has decided to consult the following additional ('other') consultees;

- National Grid
- Western Power
- Wales and West Utilities

- Archaeological Trust
- Police/ Secure by design
- Local Authority Ecology Officer
- Local Authority Drainage Officer
- Local Authority Tree Officer
- Local Authority Active Travel Officer
- Local Authority Contaminated Land Officer

3.7 The above consultees were given notice that the responses were required within 28 days from the receipt of the notice.

Response to the statutory publicity

4.1 This section provides a summary of the comments received in response to the statutory publicity, with personal data redacted in accordance with the General Data Protection Regulation (GDPR). Full copies of the responses received can be provided upon request; please note that all personal data will be redacted for data protection purposes in accordance with the GDPR.

4.2 As discussed, the application was publicised as follows;

- A site notice was displayed on/adjacent to the site; and
- Notices were issued to the adjoining land owners and/or occupiers.

4.3 159 responses were received between the date of issuing the letter and the time of the application submission. The nature of the correspondence received is summarised in the below table;

Table 4: Nature of the correspondence received	
Consultation Response	Number of Response
Support	0
Neither object nor support	0
Object	159
Total	159

4.4 The nature of the response totalled 0 in support, 0 persons of neutral opinion, and 159 objections. The contents of these responses is summarised as follows:

Flooding (9 concerns raised)

Concerns raised that Sustainable Drainage Systems (SuDS) might not prevent increased surface runoff, potentially impacting nearby properties, Crymlyn Bog SAC, and the railway line.	The proposed site will be a fully gravitational surface water drainage system, and separate gravitational foul network with a final pumped connection to the existing public sewerage network located within Crymlyn Parc. All on site sewer systems will be designed and constructed in accordance with the latest edition of “Sewers for Adoption” and any of the adopting authority’s (DCWW) specific requirements. The aim of the surface water drainage strategy is to mimic the natural catchment process as closely as possible, and the proposed system will need to be designed in accordance with the statutory “Sustainable Drainage Systems Standards for Wales” and any local authority’s SAB requirements. On site surface water attenuation strategies will help to restrict resultant discharge to the neighbouring watercourse, providing significant betterment in discharge rates for all storm events greater than a 1 year return period, as well as significant volumetric betterment for all short storm durations by comparison to existing conditions.
Neath Port Talbot’s Flood Risk Management Strategy highlights Crymlyn Parc’s susceptibility to surface water flooding. Increased impermeable surfaces could worsen flood risks.	A review of NRW’s Flood Map for Planning indicates that the northern boundary of the site is susceptible to surface water flooding as it is within Flood Zones 2 and 3. Notwithstanding, the indicative masterplan has taken this into consideration in that no dwellings will adjoin the site’s northern boundary. As such this, along with the proposed SuDS measures for the site will ensure that surface water flooding will be adequately managed as a result of the proposed development.
A similar high-density development in Cardiff’s Llanishen area led to increased surface water flooding and costly mitigation measures.	Every site has different characteristics including drainage and therefore each proposal must be considered on its own individual merits.
The removal of three large grassland areas, which aid water saturation, is a concern. The lack of attention to how water will flow post-development raises fears of exacerbating flooding.	Whilst it is acknowledged that the proposals will lead to the loss of a parcel of greenfield land, it should be noted that the land is allocated for housing under LDP Policy H1 (Housing Sites). This means the site has undergone prior screening by the local planning authority to ensure the site’s suitability for residential development. Furthermore, the Indicative Masterplan demonstrates that the site will retain large areas of greenfield land, which will aid water interception, and a SuDS basin is also proposed along the northwestern boundary of the site. The purpose of the basin is to manage and attenuate surface water during periods of heavy rainfall.

NRW flood maps show the site is at risk of flooding. The reliance on SuDS and SAB schemes is seen as insufficient, with no evidence that these measures will fully address flood risks or protect neighbouring properties.	A review of NRW's Flood Map for Planning indicates that the northern boundary of the site is susceptible to surface water flooding as it is within Flood Zones 2 and 3. Notwithstanding, the indicative masterplan has taken this into consideration in that no dwellings will adjoin the site's northern boundary. The proposals are subject to a SAB compliant drainage strategy that will need to be considered by the Local Planning Authority
The potential impact on the adjacent rail network and M4, as well as the village of Skewen, due to the loss of natural land for water saturation, is a significant concern.	A review of NRW's Development Advice Map indicates that the site resides within Flood Zone A, which indicates that the site is at little to no risk of flooding by rivers and seas. Furthermore, the Flood Map for Planning, which is due to supersede the Development Advice Map shortly, indicates that the site remains outside the identified flood zones for river and seas. In terms of surface water flooding, NRW's Flood Map for Planning indicates that the northern boundary of the site is susceptible to surface water flooding as it is within Flood Zones 2 and 3. Notwithstanding, the indicative masterplan has taken this into consideration in that no dwellings will adjoin the site's northern boundary. As such this, along with the proposed SuDS measures for the site will ensure that surface water flooding is adequately managed.
There is a question about whether Natural Resources Wales has been consulted regarding flood risk plans.	Natural Resources Wales have been consulted as part of this pre-application consultation, and have provided comments on the proposals, which can be found in Appendix G of this report.

Effect on Local Amenities / Services (92 concerns raised)

Local services such as roads, schools, healthcare, and public transport are already under strain. The proposed development will exacerbate this, leading to overcrowded schools, and longer healthcare wait times.	The impact of the development on local infrastructure and services will be considered by the LPA during the planning application process. However, the site has undergone rigorous testing through the Local Development Plan process and is an allocated site for residential purposes.
GP surgeries, dentists, and pharmacies are at full capacity. The additional housing will increase demand for healthcare services, reducing access for both new and existing residents.	The impact of the development on local infrastructure and services will be considered by the LPA during the planning application process. However, the site has undergone rigorous testing through the Local Development Plan process and is an allocated site for residential purposes.
Essential amenities like shops, parks, and recreational spaces are already insufficient. The proposed development lacks provisions for new amenities, which will lead to a car-dependent community. The proposed children's play area is also seen as inadequate and unsafe, particularly near a pond, with no	The impact of the development on local infrastructure and services will be considered by the LPA during the planning application process. However, the site has undergone rigorous testing through the Local Development Plan process and is an allocated site for residential purposes. The adequacy of the play space will be considered by the LPA however, the proposals seek to integrate door step play opportunities throughout the layout. The proposals also assist with creating better active surveillance over the existing play space.

plans for expanding sports facilities or recreational spaces.	
Local policing could be stretched with the addition of new homes, especially if health and safety concerns increase.	There is no evidence to suggest that local policing will be impacted by the proposals.
The application lacks impact assessments regarding how the increased demand on services will be managed, raising concerns about the sustainability of the development.	The impact of the development on local infrastructure and services will be considered by the LPA during the planning application process. However, the site has undergone rigorous testing through the Local Development Plan process and is an allocated site for residential purposes.
The development will destroy a valued area of natural beauty and green space used for recreation and wildlife habitat. The loss of these spaces for children to play and families to enjoy nature is a significant concern.	Whilst it is acknowledged that the proposals will lead to the loss of a parcel of greenfield land, the land is allocated for housing under LDP Policy H1 (Housing Sites). This means the site has undergone prior screening by the local planning authority to ensure the site's suitability for residential development. Furthermore, the proposals will ensure that biodiversity enhancements are provided in line with national planning guidance.
The construction and increased traffic are likely to disrupt local wildlife and lead to higher pollution, which could negatively affect air quality and residents' health and mental well-being.	Temporary disturbance during any construction activities is an inevitable consequence of development however this will be managed through the construction stage with the assistance of construction management plans to minimise disruption and minimise any impacts on the environment.
The development threatens the local rural character and balance of the existing community, particularly through the destruction of the only accessible green space and park for many residents.	It is considered that the proposals are in keeping with the character of the surrounding residential neighbourhood and through the incorporation of a mixed tenure approach to the site the proposals will ensure a mixed and balanced community.
Without adequate amenities like shops, healthcare, and recreational spaces, the development could lead to social isolation, particularly for vulnerable groups like children, the elderly, and those with health needs, potentially exacerbating mental health issues.	The impact of the development on local infrastructure and services will be considered by the LPA during the planning application process. However, the site has undergone rigorous testing through the Local Development Plan process and is an allocated site for residential purposes.
The development is perceived as prioritizing council tax revenue over community welfare. Many residents fear the increased housing will lead to a decline in living standards for both new and existing residents.	This is not the case. The proposals will ensure improved living standards for those in most need and the proposals are not considered to negatively impact the living conditions of existing residents.
The addition of 153 homes without proper infrastructure improvements is seen as unsustainable, leading to	The impact of the development on local infrastructure and services will be considered by the LPA during the planning application process. However, the

a further strain on already overloaded local services and a decrease in quality of life.	site has undergone rigorous testing through the Local Development Plan process and is an allocated site for residential purposes. Any S106 obligations required as a result of the proposals will need to be negotiated with the applicant and LPA.
Local schools, including Skewen Primary, are oversubscribed, and the development will worsen overcrowding. There are no plans to expand educational facilities to meet the needs of the additional population.	The impact of the development on local schools will be considered by the LPA as part of the application and any improvements required as a result of the proposals will be considered through any required S106 Obligations.
Site Access (37 concerns raised)	
Proposed access points are too close to residential areas with young families, and narrow roads, especially in Cae Morfa, pose safety risks for pedestrians, children, and construction vehicles.	The proposed access points have been designed to adoptable standards and will be subject to any required Road Safety Assessment. The Local Highways Authority will be consulted as part of the planning application and their comments incorporated into the design as necessary
Outdated traffic surveys, narrow roads, and insufficient access points will worsen congestion and increase reliance on vehicles due to limited transport links.	The accompanying Transport Assessment notes that traffic surveys were undertaken at the Crymlyn Gardens and Crymlyn Parc junctions on Tuesday 18th June 2024 (paragraph 3.18). Additional traffic surveys are also being undertaken following the PAC process in accordance with Highway Officer requests. The Manual for Streets, which provides guidelines on designing roads, states that there should be minimum carriageway width of 3.7m between kerbs. This is to ensure sufficient space for fire engines, which are the largest emergency vehicles. Paragraph 4.2 of the Transport Assessment notes that the existing dimensions of Crymlyn Parc will be continued; a 5.5m wide carriageway with 2m wide footways on both sides. This demonstrates that the proposed site accesses and roads can accommodate both smaller and larger vehicles in accordance with adopted standards.
There has been no consultation with emergency services about their ability to safely access the site, raising concerns over their response in emergencies due to narrow roads.	The Manual for Streets, which provides guidelines on designing roads, states that there should be minimum carriageway width of 3.7m between kerbs. This is to ensure sufficient space for fire engines, which are the largest emergency vehicles. Paragraph 4.2 of the Transport Assessment notes that the existing dimensions of Crymlyn Parc will be continued; a 5.5m wide carriageway with 2m wide footways on both sides. In light of the above, it is considered that the proposed highway width will be suitable for emergency vehicles.
The use of existing access roads for both construction and residential traffic is deemed unacceptable, with fears that local roads will be overwhelmed and no plans for alternative access routes.	Prior to the commencement of development, the site contractor will need to prepare a Construction Traffic Management Plan, which will outline the measures that will be taken to ensure the development will have a minimal impact on the traffic in the surrounding area.

Biodiversity Impacts (46 concerns raised)

The development would destroy green spaces, farmland, and wildlife habitats, negatively affecting local species like bats, badgers, foxes, hedgehogs, and pollinators, with concerns about the loss of biodiversity and ecological balance.	Whilst it is acknowledged that the proposals will lead to the loss of a parcel of greenfield land, the land is allocated for housing under LDP Policy H1 (Housing Sites). This means the site has undergone prior screening by the local planning authority to ensure the site's suitability for residential development. Furthermore, the proposals will ensure that biodiversity enhancements are provided in line with national planning guidance.
Protected species, including bats and birds, could lose their habitats, with insufficient mitigation measures for these species in the ecological impact assessment.	The accompanying Preliminary Ecological Appraisal states that <i>"The development Site supports no significant botanical interest. The fields are heavily grazed... Mature trees on the field boundaries offer opportunities for breeding birds and potentially roosting bats. However an updated Ground Level Tree Assessment and climbing survey did not find trees of high value potential for roosting bats.</i> <i>The proposed development will impact mainly upon the agriculturally modified grassland which is of low species diversity and to a lesser extent the derelict hedgerows. It is recommended that the hedgerows are to be retained, and if so it is considered that the development is likely to have little impact upon species currently using the Site.</i> <i>It is considered that there are no apparent overriding ecological reasons that would prevent the proposal proceeding, recommendations to enhance biodiversity are made within the report."</i>
The development prioritizes housing over environmental sustainability, risking pollution, habitat disturbance, and degradation of local ecosystems, including Crymlyn Bog, a nearby Special Area of Conservation.	Whilst it is acknowledged that the proposals will lead to the loss of a parcel of greenfield land, the land is allocated for housing under LDP Policy H1 (Housing Sites). This means the site has undergone prior screening by the local planning authority to ensure the site's suitability for residential development. Furthermore, the proposals will ensure that biodiversity enhancements are provided in line with national planning guidance.
Outdated ecological surveys and a lack of consultation with Natural Resources Wales raise concerns about the adequacy of the assessments regarding local wildlife and the impact on the Site of Special Scientific Interest.	The accompanying Preliminary Ecological Appraisal was prepared in September 2024. Protected species surveys are recognised as having a 'shelf life' of two years. As such, the report is deemed an acceptable and up-to-date document to submit alongside this outline planning application. Consultation has taken place with NRW as part of the PAC process.
The loss of valuable green spaces and farmland would negatively affect local residents' quality of life, particularly families, and reduce the community's access to environmental and recreational benefits.	It should be noted that open space provision is a requirement for the development. Consequently, an area of open space is proposed as part of the development. The existing agricultural fields are privately owned and do not have public access. Through the provision of development additional areas of open space will be made available for all existing and proposed residents.
Converting productive farmland to housing would harm local food	Specialist consultees in agricultural land classification and soil were consulted during the PAC period, and provided the following comments:

production and reduce available resources.	<i>"The site is currently allocated as a Housing Allocation (Policy H1) in the adopted (2016) Neath Port-Talbot LDP, therefore BMV policy would have been considered for allocations as part of the LDP process."</i> As such, they conclude that the site is suitable for a housing development.
The development contradicts planning policies protecting green belts and areas of natural beauty, especially near the SSSI, with calls for stricter adherence to environmental guidelines and Welsh Government biodiversity policies.	The application site is not located within a Green Belt or Green Wedge, and is not within proximity to a SSSI. The site is allocated for housing in the existing Local Development Plan.

Traffic (78 concerns raised)

The development will add up to 306 vehicles, worsening congestion on already busy roads like Crymlyn Road, Cae Morfa, and Skewen, with narrow residential streets struggling to accommodate the extra traffic.	Paragraph 4.7 of the Transport Assessment notes that TRICS data suggests that the development has the potential to generate between 69 and 77 peak hour vehicle movements. As such, the estimated traffic generation of the proposed development is insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network.
Local roads are in poor condition, outdated, and ill-equipped to handle increased traffic, leading to further congestion and delays, especially during peak hours.	An assessment of the characteristics of the local roads has been carried out as part of the Transport assessment and deemed to be acceptable to support the proposals. The views of the Local Highway Authority will be taken into account during the course of the planning application.
Increased traffic poses safety risks, particularly for pedestrians, children, cyclists, and areas with high foot traffic like parks and residential streets. Narrow roads, lack of traffic calming, and past traffic accidents raise concerns.	It is not considered that the proposal will give rise to any significant risk to highway safety. This has been considered and addressed within the supporting Transport Assessment which will be considered by the Local Highway Authority.
No clear plans for upgrading road design, parking, or public transport to accommodate the additional traffic, with concerns over insufficient parking provision in the development.	It is not considered that the proposal will give rise to any significant risk to highway safety. This has been considered and addressed within the supporting Transport Assessment which will be considered by the Local Highway Authority. Parking provided within the development accords with the Council's parking standards.
Construction traffic, including heavy vehicles, will cause significant disruption and safety risks, particularly with narrow streets and proximity to parks.	Prior to the commencement of development, the site contractor will need to prepare a Construction Traffic Management Plan, which will outline the measures that will be taken to ensure the development will have a minimal impact on the traffic in the surrounding area.
Traffic surveys are deemed insufficient, with doubts over the ability of local roads to cope with the added traffic and the safety and practicality of the proposed road system.	Additional traffic surveys are being undertaken in accordance with an agreed scope with the Local Highways Authority.

Local roads are already congested, especially during peak hours, and cannot handle further increases in traffic. Current infrastructure struggles with traffic queues and congestion.	Paragraph 4.7 of the Transport Assessment notes that TRICS data suggests that the development has the potential to generate between 69 and 77 peak hour vehicle movements. As such, the estimated traffic generation of the proposed development is insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network.
The development will add significant traffic, with 686 additional vehicles daily and 50 heavy construction vehicles, worsening congestion and safety risks, especially for children and elderly residents.	Paragraph 4.7 of the Transport Assessment notes that TRICS data suggests that the development has the potential to generate between 69 and 77 peak hour vehicle movements. This equates to 25 arrivals and 43 departures between 8am-9am, and 43 arrivals and 33 departures between 5pm-6pm. As such, the estimated traffic generation of the proposed development is insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network.
The development lacks nearby amenities and public transport options, leading to increased reliance on private cars, worsening traffic congestion.	There are a number of bus stops in the vicinity of the site. There are two within the Crymlyn Parc development and one Crymlyn Road. The bus stops provide access to service number 155 (Neath – Llandarcy Village via Skewen) which provides 5 daily services in each direction on Tuesdays and Thursdays. The No. 38 (Swansea – Neath) service runs hourly, 7 days a week, and can be accessed from the bus stops located near the Crymlyn Road / Pen yr Alley Avenue junction, some 1200m / 16 minutes walk from the application site. Skewen railway station is approximately 2km / 30 minutes walk from the site. Bus service 155 described above provides a convenient link between the development site and the railway station. Skewen railway station is on the South Wales mainline, which provides hourly services to Swansea and Cardiff. Neath and Swansea stations also provide access to mainline services and can both be reached within a reasonable cycle journey. As such, it is considered that the site is located in a sustainable location.
Increased traffic will reduce quality of life due to noise, pollution, and the deterioration of community atmosphere, with additional strain on already flood-prone roads.	It is not anticipated that the proposal will give rise to any significant increase in noise and disturbance. An Air Quality assessment has been submitted in support of the application along with a Noise Impact Assessment.
Local roads are unsuitable for heavy traffic, already prone to accidents, flooding, and congestion, highlighting the need for a new link road to accommodate additional traffic.	It is considered that the existing road infrastructure is suitable to accommodate the development which is an allocated housing site in the existing LDP.

Visual Impacts (55 concerns raised)

The high-density development of 153 properties, including multi-storey flats, is seen as out of character with the surrounding lower-density housing.	In terms of the proposed housing mix, the accompanying Planning Statement notes that the proposed layout has been designed following an extensive review of the surrounding area. Notwithstanding, in light of the comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats.
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The introduction of 2- and 3-storey flats is considered an eyesore, detracting from the visual appeal and overshadowing existing properties.	In light of the comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats.
The height and proximity of the flats, particularly 3-storey ones, raise significant privacy concerns due to potential overlooking of neighbouring properties.	In terms of the proposed housing mix, the accompanying Planning Statement notes that the proposed layout has been designed following an extensive review of the surrounding area. The layout utilises a mix of apartments and houses that are designed to respect the location of the site. Furthermore, following comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats, which helps address overlooking concerns.
The development is seen as blocking existing scenic vistas and altering the visual landscape.	The application site is allocated for residential development under LDP Policy H1/9 Crymlyn Grove (Phase 3). The landscape proposals for the site are based on a Stepwise Approach, and given the importance of existing green infrastructure at the site, the strategy was to avoid and retain wherever possible. Where green infrastructure features have been lost the design has mitigated and/or compensated for the loss and enhanced the green infrastructure overall. Consequently, the proposals should not have a detrimental impact on the landscape of the area.
The development is perceived as threatening the community's established identity and cohesion, potentially causing social divisions.	In terms of the proposed housing mix, the accompanying Planning Statement notes that the proposed layout has been designed following an extensive review of the surrounding area. The layout utilises a mix of apartments and houses that are designed to respect the location of the site. The form of the layout, using semidetached and terraced dwellings in a linear format, also reflects the prevailing character of the area. Also, following comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats. Furthermore, in relation to affordable housing, paragraph 6.18 of the Planning Statement explains that whilst the proposed development will provide in excess of the required affordable housing provision, it will provide a balanced mix of shared owner-ship, intermediate rent and social rent tenures. This will ensure that the community is well balanced.
Concerns about the impact of construction on the area's character and long-term damage to the visual aesthetic of the community.	Prior to the commencement of development, the site contractor will need to prepare a Construction Environmental Management Plan, which will outline the measures that will be taken to ensure the development will have a negligible impact on the existing character of the area.
Previous developments with similar high-density housing have led to public opposition due to inconsistencies with local architectural styles.	The accompanying Planning Statement notes that the proposed layout has been designed following an extensive review of the surrounding area. The layout utilises a mix of apartments and houses that are designed to respect the location of the site. Furthermore, amendments have been made to the housing mix in light of comments received during the pre-application consultation period. The three storey flats have been reduced to two-storey walk-up flats.

Pedestrian / Children Safety (72 concerns raised)

Proposed access points and increased traffic pose safety risks for children, particularly near Crymlyn Parc play area, with heavy construction vehicles creating further dangers.	The existing street dimensions of Crymlyn Parc will be continued; a 5.5m wide carriageway with 2m wide footways on both sides. The second access will be built with the same dimensions as the existing street dimensions. This is in line with the design code criteria outlined within the Manual For The Streets (Page 34). In terms of traffic generation, Section 4 of the Transport Assessment notes that the development has the potential to generate some 69 to 77 peak hour vehicle movements. As such, far fewer vehicles will travel to/from the site outside these peak hours. The estimated traffic generation of the proposed development is therefore insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network.
Increased traffic, including up to 600 vehicles, will make local roads more hazardous, especially for pedestrians, cyclists, and children, and construction traffic further exacerbates these risks.	Section 4 of the Transport Assessment notes that the development has the potential to generate some 69 to 77 peak hour vehicle movements. As such, far fewer vehicles will travel to/from the site outside these peak hours. The estimated traffic generation of the proposed development is therefore insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network.
Existing infrastructure is inadequate to handle the increased traffic, creating significant safety hazards for pedestrians, cyclists, and residents, especially with narrow, congested roads.	The existing street dimensions of Crymlyn Parc will be continued; a 5.5m wide carriageway with 2m wide footways on both sides. The second access will be built with the same dimensions as the existing street dimensions. This is in line with the design code criteria outlined within the Manual For The Streets (Page 34). Traffic calming measures have also been incorporated into the road design following comments made during the pre-application consultation. This will increase both cyclist and pedestrian safety as cars will need to slow down to pass through the traffic calming measures.
The construction entrance near residential areas with narrow roads raises concerns about large vehicles navigating safely, leading to accidents and disrupting the local environment and residents' safety.	The existing street dimensions of Crymlyn Parc will be continued; a 5.5m wide carriageway with 2m wide footways on both sides. The second access will be built with the same dimensions as the existing street dimensions. This is in line with the design code criteria outlined within the Manual For The Streets (Page 34).
The increase in traffic after construction will create ongoing safety risks, particularly for children playing outdoors, with unsuitable access roads near parks and narrow residential streets.	Section 4 of the Transport Assessment notes that the development has the potential to generate some 69 to 77 peak hour vehicle movements. As such, far fewer vehicles will travel to/from the site outside these peak hours. The estimated traffic generation of the proposed development is therefore insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network.
The development poses a long-term threat to the safety and well-being of the local community, particularly for young families and children, with potential social impacts due to housing types.	In terms of the proposed housing mix, the accompanying Planning Statement notes that the proposed layout has been designed following an extensive review of the surrounding area. The layout utilises a mix of apartments and houses that are designed to respect the location of the site. The form of the layout, using semidetached and terraced dwellings in a linear format, also reflects the prevailing character of the area. Also, following comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats.

	Furthermore, in relation to affordable housing, paragraph 6.18 of the Planning Statement explains that whilst the proposed development will provide in excess of the required affordable housing provision, it will provide a balanced mix of shared owner-ship, intermediate rent and social rent tenures. This will ensure that the community is well balanced. From a traffic generation perspective, section 4 of the Transport Assessment notes that the development has the potential to generate some 69 to 77 peak hour vehicle movements. As such, far fewer vehicles will travel to/from the site outside these peak hours. The estimated traffic generation of the proposed development is therefore insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network.
Large construction vehicles near play areas pose a significant danger to young children, creating an unsafe environment for families using the park.	A Construction Management Plan will be prepared for the construction stage of the project that will deal with site risks and manage any impacts.
Narrow, congested roads, especially in Cae Morfa, will be further exacerbated by construction traffic, increasing the risk of accidents and disruptions.	A Construction Management Plan will be prepared for the construction stage of the project that will deal with site risks and manage any impacts.
Increased traffic and construction would diminish the safety and quiet environment that attracted families to the area, especially for children who play outside regularly.	From a traffic generation perspective, section 4 of the Transport Assessment notes that the development has the potential to generate some 69 to 77 peak hour vehicle movements. As such, far fewer vehicles will travel to/from the site outside these peak hours. The estimated traffic generation of the proposed development is therefore insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network. In terms of the construction phase of the development, the site contractor will need to prepare a Construction Environmental Management Plan, which will outline the measures that will be taken to reduce the impact of the construction phase on existing residents in the area. Examples of the information provided in a CEMP include construction working hours, and measures to reduce noise and light pollution.
The development will increase vehicle numbers without sufficient parking, potentially forcing cars to park on pavements or narrow streets, further increasing the risk of accidents.	From a traffic generation perspective, section 4 of the Transport Assessment notes that the development has the potential to generate some 69 to 77 peak hour vehicle movements. As such, far fewer vehicles will travel to/from the site outside these peak hours. The estimated traffic generation of the proposed development is therefore insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network. Also, the Transport Assessment demonstrates that safe vehicular access to the site can be provided and adequate parking provision is made for the future occupiers and users of the site. As such, the proposals will have no detrimental impact on existing dwellings in the area.

Sustainable Travel Comments (33 concerns raised)

Public transport is infrequent and poor in the area, with buses operating on limited days, and the nearest bus stop is over half a mile away. The railway station is 30 minutes away on foot, with limited services.	There are a number of bus stops in the vicinity of the site. There are two within the Crymlyn Parc development and one Crymlyn Road. The bus stops provide access to service number 155 (Neath – Llandarcy Village via Skewen) which provides 5 daily services in each direction on Tuesdays and Thursdays. The No. 38 (Swansea – Neath) service runs hourly, 7 days a week, and can be accessed from the bus stops located near the Crymlyn Road / Pen yr Alley Avenue junction, some 1200m / 16 minute walk from the application site. Skewen railway station is approximately 2km / 30 minute walk from the site. Bus service 155 described above provides a convenient link between the development site and the railway station. Skewen railway station is on the South Wales mainline, which provides hourly services to Swansea and Cardiff. Neath and Swansea stations also provide access to mainline services and can both be reached within a reasonable cycle journey. As such, it is considered that the site is located in a sustainable location.
The development will exacerbate existing public transport issues, increasing car dependency, and contributing to road congestion and pollution, without addressing the lack of sustainable transport options.	The proposals will not exacerbate existing public transport issues, if anything a greater population can only increase the demand for such provision. The Transport Assessment assesses the impact of the development. The estimated traffic generation of the proposed development is considered insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network.
There are no cycle paths and inadequate walking routes, with missing pavements on Crymlyn Road, making active travel unsafe and impractical.	The proposals incorporate active travel provision within the layout and thereby seek to encourage greater use.
The development's location is isolated, with no local amenities within walking distance, leaving residents without cars isolated due to the lack of public transport and long distances to basic services.	As aforementioned there is a reasonable bus provision in the locality. Furthermore as previously mentioned the site is allocated for housing in the existing Local Development Plan so has undergone a rigorous process of site selection.
The planning statement's claims about transport links and opportunities for active travel are seen as misleading, as they don't accurately reflect the area's poor transport links and infrastructure.	It is not considered that the Planning Statement is misleading, it factually represents the active travel opportunities.

Housing Mix and/or Density Comments (59 concerns raised)

The high proportion of social housing (144 out of 153 units) raises concerns about potential social division and increased anti-social	In relation to affordable housing, paragraph 6.18 of the Planning Statement explains that whilst the proposed development will provide in excess of the required affordable housing provision, it will provide a balanced mix of shared owner-ship, intermediate rent and social rent tenures. This will ensure that the
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behaviour, especially near areas with young families.	community is well balanced, and will not lead to an increase in anti-social behaviour.
The housing mix, consisting mainly of small flats and terraced homes, contrasts with the existing larger, privately owned detached and semi-detached homes in the area.	In terms of the proposed housing mix, the accompanying Planning Statement notes that the proposed layout has been designed following an extensive review of the surrounding area. The layout utilises a mix of apartments and houses that are designed to respect the location of the site. Furthermore, following comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats, which is more in keeping with the character of the surrounding area.
The focus on social housing, particularly small one-bedroom flats, could lead to social isolation, stigmatization, and an increase in crime and anti-social behaviour, affecting the community's well-being.	In relation to affordable housing, paragraph 6.18 of the Planning Statement explains that whilst the proposed development will provide in excess of the required affordable housing provision, it will provide a balanced mix of shared owner-ship, intermediate rent and social rent tenures. This will ensure that the community is well balanced, and will not lead to an increase in anti-social behaviour.
The absence of larger homes, especially 4-bedroom houses, which are in demand in the area, does not meet the needs of larger families or align with the community's demographics.	The proposals reflect a local need in the area and represent the market needs for homes in the locality. There are 4 bedroom homes included within the illustrative layout.
The high concentration of social housing without proper integration with private homes could undermine community cohesion and long-term social sustainability.	In terms of the proposed housing mix, the accompanying Planning Statement notes that the proposed layout has been designed following an extensive review of the surrounding area. The layout utilises a mix of apartments and houses that are designed to respect the location of the site. Furthermore, following comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats, which is more in keeping with the character of the surrounding area.
The focus on social housing may deter private investment, reducing the area's economic vitality and hindering the development of a sustainable community.	A mixed tenure approach is proposed through the layout of the scheme.
The proposed three-storey flats, particularly near children's play parks, are considered out of character with the predominantly 2-storey homes in the area.	Following comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats, which is more in keeping with the character of the surrounding area.
Increased crime and anti-social behaviour due to the large proportion of social housing could negatively impact the safety of	As part of the Pre-application Consultation, the Secure by Design Officer was consulted, and noted that they were generally pleased with the site layout and that key areas such as parking bays are overlooked, thus reducing the likelihood of anti-social behaviour.

existing residents, especially families with children.	
The emphasis on social housing, particularly in an area with high council tax rates, misses the opportunity to introduce more privately owned homes that would better meet the needs of the local population.	In relation to affordable housing, paragraph 6.18 of the Planning Statement explains that whilst the proposed development will provide in excess of the required affordable housing provision, it will provide a balanced mix of shared owner-ship, intermediate rent and social rent tenures. This will ensure that the community is well balanced, and will not lead to an increase in anti-social behaviour.
Concerns over the long-term upkeep of communal areas in the flats, particularly with leasehold arrangements, could lead to management issues compared to freehold properties in the surrounding area	Any freehold interests would be retained and managed by Pobl who are a reputable registered social landlord.
Comparisons to successful local developments, like Cae Morfa, show that social housing can be better integrated into the community, highlighting the missed opportunity for a more harmonious design.	The proposals incorporate a mixed tenure approach across the development.
Site Location (27 concerns raised)	
Many residents suggest that the nearby Coed Darcy brownfield site, which has appropriate infrastructure and is already designated for development, would be a better location for this scale of housing. It is considered more suitable for additional housing without impacting greenfield land.	Whilst it is acknowledged that the proposals will lead to the loss of a parcel of greenfield land, the site is allocated for housing under LDP Policy H1 (Housing Sites). This means the site has undergone prior screening by the local planning authority to ensure the site's suitability for residential development.
There is strong opposition to developing greenfield land, especially when brownfield sites like Coed Darcy remain undeveloped. Residents argue that greenfield sites should be preserved for ecological reasons, and that developments should prioritize brownfield sites to avoid unnecessary harm to green spaces.	Specialist consultees in agricultural land classification and soil were consulted during the PAC period, and provided the following comments: "The site is currently allocated as a Housing Allocation (Policy H1) in the adopted (2016) Neath Port-Talbot LDP, therefore BMV policy would have been considered for allocations as part of the LDP process." As such, they conclude that the site is suitable for a housing development because the site has undergone prior screening by the local planning authority to ensure this.
The development is seen as conflicting with sustainability and	It is considered that the proposals balance the need for housing with biodiversity and environmental objectives. The site is allocated for housing in

ecological goals, with residents highlighting the loss of green spaces, habitats, and potential pollution concerns. They fear that the development would damage local ecosystems and reduce the quality of life for existing residents.	the Local Development Plan. The principle of development for the purposes proposed is firmly established.
Many comments refer to previous guidance by PEDW, which discourages major development in areas identified as Green Belt or Green Wedges except in exceptional circumstances. Residents believe the proposed site does not meet these exceptional circumstances and should not have been identified for housing.	The application site is not considered to be located within a Green Belt or Green Wedge, and is allocated as a Housing Allocation (Policy H1) in the adopted (2016) Neath Port-Talbot LDP.
There are concerns about the potential disruption caused by the development, especially in terms of noise, traffic, and safety. Some residents highlight the proximity of the development to a busy working farm (Pentwyn Farm) and suggest the need for a buffer zone due to safety hazards such as slurry pits and farm machinery.	It is not considered that the proposals will give rise to any significant increase in noise, traffic and safety concerns. Pentwyn Farm has been considered in the proposals and the design responds to its presence through the buffering with proposed residential units.
Several comments suggest that the Llandarcy area, which is already undergoing significant development, could accommodate more housing and should be prioritized over greenfield sites. The Llandarcy area has better infrastructure, transport links, and potential for further development without impacting greenfield land.	Whilst it is acknowledged that the proposals will lead to the loss of a parcel of greenfield land, the site is allocated for housing under LDP Policy H1 (Housing Sites). This means the site has undergone prior screening by the local planning authority to ensure the site's suitability for residential development. Furthermore, Wales is currently in the midst of a housing crisis, therefore it is imperative that local planning authorities prioritise approving planning applications for sites that are allocated for residential development.
There are concerns that the development lacks adequate community amenities and infrastructure, such as parks, green spaces, and local services. This, combined with the location's dependence on car travel, could lead to a commuter-based	The proposal incorporates areas of open space and provide better surveillance of existing areas of open space which will benefit existing residents.

community with limited local engagement.	
The current state of local roads is seen as insufficient for the increased traffic that the development would generate. Some residents argue that infrastructure at Coed Darcy would better support the development, with better road access and existing plans for local services and amenities.	The Manual for the Streets, which provides guidelines on designing roads, states that there should be minimum carriageway width of 3.7m between kerbs. This is to ensure sufficient space for fire engines, which are the largest emergency vehicles. Paragraph 4.2 of the Transport Assessment notes that the existing dimensions of Crymlyn Parc will be continued; a 5.5m wide carriageway with 2m wide footways on both sides.
Several comments suggest that there is already a sufficient stock of housing in the area, and that the proposed development may flood the housing market, making it harder for existing properties to sell. Some residents also question the focus of the development on profit generation for developers rather than addressing actual housing needs.	Wales is currently in the midst of a housing crisis, therefore it is imperative that local planning authorities prioritise approving planning applications for sites that are allocated for residential development. In terms of the housing market and developer profits, these are not a material planning consideration.
Environmental Impacts (49 concerns raised)	
Current residents already face significant noise and air pollution from the nearby M4 motorway, and the addition of 153 homes and increased traffic will exacerbate these issues, negatively impacting quality of life. The reliability of the 2021 noise impact assessment is questioned due to pandemic-related traffic conditions.	In terms of traffic generation the Transport Assessment notes that the development has the potential to generate between 69 and 77 peak hour vehicle movements. As such, the estimated traffic generation of the proposed development is insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network. From an air quality perspective, the Air Quality Assessment concludes that the Proposed Development is not expected to worsen the air quality in the local area, with all pollutant concentrations below the respective AQOs and LVs. As set out in the appended document '<i>Air Quality at Locations of Human Health Exposure: Crymlyn Parc, Skewen</i>', the maximum change in annual mean concentrations in 2026 is less than 1% of the respective AQOs. Thus, all changes in pollutant concentrations are described as '<i>negligible</i>'. In terms of noise pollution, the accompanying Noise Impact Assessment concludes that with the noted building fabric construction, and suitable ventilation provisions, the predicted internal noise levels within the proposed dwellings from both road traffic and rail noise are easily within the criteria of British Standard 8233:2014 of 35 dB LAeq (16 hour) in the daytime rooms, and 30 dB LAeq (8 hour) and 45 dB L_{Amax}(F) in the night-time rooms. As such, Acoustic Consultants Ltd. consider external noise to be suitably controlled within the habitable rooms of the proposed residential development and good internal conditions can be achieved. The noise map predictions

	provided in their report also indicate that noise levels in amenity spaces fall within the upper guideline value of BS8233 and are therefore acceptable.
The development will lead to an estimated 686 new car journeys and over 50 additional HGV journeys per day, increasing carbon emissions, noise, and air pollution, conflicting with climate goals for reduced emissions. Existing traffic congestion will worsen, further deteriorating air quality.	The first figure has been taken from the Air Quality Assessment, which states in paragraph 2.7 that: <i>"The annual average daily traffic (AADT) generated by the development is estimated to be 686, with 343 arrivals and 343 departures".</i> The Transport Assessment notes that the development has the potential to generate between 69 and 77 peak hour vehicle movements. This means that all other movements are likely to be spread out across the remaining 22 hours of the day, which equates to 12-13 vehicle movements in each direction per hour on average (343 – peak hour vehicle movement / 22hours). In terms of construction vehicle traffic, Paragraph 2.9 of the Air Quality Assessment states that whilst the traffic generated during the construction phase is currently unknown, it is unlikely that more than 50 heavy duty vehicles (HDVs) will access and egress the site daily. This equates to 25 HDVs arriving and 25 HDVs departing the site throughout the day. As such, the estimated traffic generation of the proposed development is insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network. From an air quality perspective, the Air Quality Assessment concludes that the Proposed Development is not expected to worsen the air quality in the local area, with all pollutant concentrations below the respective AQOs and LVs. As set out in the appended document '<i>Air Quality at Locations of Human Health Exposure: Crymlyn Parc, Skewen</i>', the maximum change in annual mean concentrations in 2026 is less than 1% of the respective AQOs. Thus, all changes in pollutant concentrations are described as '<i>negligible</i>'. In terms of noise pollution, the accompanying Noise Impact Assessment concludes that with the noted building fabric construction, and suitable ventilation provisions, the predicted internal noise levels within the proposed dwellings from both road traffic and rail noise are easily within the criteria of British Standard 8233:2014 of 35 dB LAeq (16 hour) in the daytime rooms, and 30 dB LAeq (8 hour) and 45 dB L_{Amax}(F) in the night-time rooms. As such, Acoustic Consultants Ltd. consider external noise to be suitably controlled within the habitable rooms of the proposed residential development and good internal conditions can be achieved. The noise map predictions provided in their report also indicate that noise levels in amenity spaces fall within the upper guideline value of BS8233 and are therefore acceptable.
The construction phase will bring noise, dust, heavy machinery, and increased traffic, severely disrupting the community, particularly for residents working from home or with young children. Concerns include soil and water contamination from construction	Prior to the commencement of development, the site contractor will need to prepare a Construction Environmental Management Plan, which will outline the measures that will be taken to ensure the development will have a negligible impact on residents in the area.

activities, which will permanently increase noise, light, and air pollution.	
There are concerns about elevated arsenic levels in the soil and potential environmental contamination from hazardous waste near the site. Previous reports do not sufficiently address pollution from non-mobile machinery and heavy plant during construction.	The accompanying Geotechnical and Geoenvironmental Report states that to protect future site users from the identified contamination either the site will need to be capped, or the affected soils could be removed from site and disposed of at a suitably licenced landfill site. If the site is capped, the capping will consist of the proposed buildings and hard standings, and in garden and soft landscaped areas the capping should consist of 600mm of suitable inert topsoil, and subsoil if desired. Providing the proposed development obtains planning approval, the site contractor will ensure that they adhere to the recommendations provided in all reports.
New street and residential lighting will contribute to light pollution, negatively affecting local wildlife and diminishing the natural nighttime environment.	A Lighting Strategy will be prepared following planning application approval to ensure that the development has a limited impact on wildlife and upon existing residents.
Long-term exposure to noise and air pollution may cause respiratory problems and increase stress for residents. The extended construction timeline will disrupt residents' lives and well-being for several years.	Prior to the commencement of development, the site contractor will need to prepare a Construction Environmental Management Plan, which will outline the measures that will be taken to limit noise and air pollution during the construction phase of the development. Further information will be prepared by the site contractor to address traffic management during the construction phase, therefore the proposals should not have a detrimental effect on the existing residents of Crymlyn Parc.
The development is seen as detrimental to both the community and the local environment, with concerns about pollution, contamination, and traffic. There are also worries about the adequacy of environmental assessments and mitigation measures in the planning documents.	The planning submission is supported by a comprehensive suite of supporting documents which demonstrates that any adverse impacts associated with the development can be adequately managed and controlled.
Existing Use of the Site (19 concerns raised)	
The field serves as an emergency landing site for the air ambulance.	The site is in private ownership and not publicly accessible land.
Local residents, including those from neighbouring areas like Cae Morfa and Crymlyn Parc/Crymlyn Gardens, use the site for leisure activities such as walking, which contributes to their mental and physical well-being. The green space is particularly valuable for families and individuals with	The application site is not considered to be located within a Green Belt or Green Wedge, and is not allocated for leisure purposes. Rather, the site is allocated as a Housing Allocation (Policy H1) in the adopted (2016) Neath Port-Talbot LDP. An area of amenity grassland will remain on land that adjoins the southern boundary of the site, where the existing play area is located. Furthermore, Skewen Park, which has a range of sporting facilities, is located some 1.6km to the east of the site.

disabilities, offering a safe and peaceful environment.	
The site is currently used for agricultural purposes, though some neighbours believe it is poorly managed. Despite this, there is a strong desire to preserve such green spaces as a buffer between urban sprawl and the motorway, benefiting both the environment and wildlife.	The accompanying Preliminary Ecological Appraisal states that <i>"The development Site supports no significant botanical interest. The fields are heavily grazed... Mature trees on the field boundaries offer opportunities for breeding birds and potentially roosting bats. However an updated Ground Level Tree Assessment and climbing survey did not find trees of high value potential for roosting bats.</i> <i>The proposed development will impact mainly upon the agriculturally modified grassland which is of low species diversity and to a lesser extent the derelict hedgerows. It is recommended that the hedgerows are to be retained, and if so it is considered that the development is likely to have little impact upon species currently using the Site.</i> <i>It is considered that there are no apparent overriding ecological reasons that would prevent the proposal proceeding, recommendations to enhance biodiversity are made within the report."</i> Furthermore, specialist consultees in agricultural land classification and soil were consulted during the PAC period, and provided the following comments: <i>"The site is currently allocated as a Housing Allocation (Policy H1) in the adopted (2016) Neath Port-Talbot LDP, therefore BMV policy would have been considered for allocations as part of the LDP process."</i> As such, they conclude that the site is suitable for a housing development.
Existing Infrastructure Concerns (49 concerns raised)	
The local roads are in poor condition, with potholes, narrow streets, and a lack of maintenance, which cannot accommodate the traffic increase from 153 new homes. Heavy construction vehicles will further damage the fragile road surfaces. Existing congestion, particularly on Crymlyn Road and other local roads, will worsen, creating safety risks for pedestrians, including children. Questions have been raised about constructing new access roads over high-pressure gas mains and power lines.	<u>Existing roads</u> The Manual for the Streets, which provides guidelines on designing roads, states that there should be minimum carriageway width of 3.7m between kerbs. This is to ensure sufficient space for fire engines, which are the largest emergency vehicles. Paragraph 4.2 of the Transport Assessment notes that the existing dimensions of Crymlyn Parc will be continued; a 5.5m wide carriageway with 2m wide footways on both sides. This demonstrates that the existing roads leading up to the development site are adequate. <u>Construction Vehicles</u> A Construction Traffic Management Plan will be prepared by the site contractor prior to the development commencing which will outline the measures that will be taken to ensure that the existing highway is maintained and the management of vehicle movements. <u>Increased Congestion</u> The accompanying Air Quality Assessment, which states in paragraph 2.7 that: <i>"The annual average daily traffic (AADT) generated by the development is estimated to be 686, with 343 arrivals and 343 departures".</i>

	The Transport Assessment notes that the development has the potential to generate between 69 and 77 peak hour vehicle movements. This means that all other movements are likely to be spread out across the remaining 22 hours of the day, which equates to 12-13 vehicle movements in each direction per hour on average (343 – peak hour vehicle movement / 22). In terms of construction vehicle traffic, Paragraph 2.9 of the Air Quality Assessment states that whilst the traffic generated during the construction phase is currently unknown, it is unlikely that more than 50 heavy duty vehicles (HDVs) will access and egress the site daily. This equates to 25 HDVs arriving and 25 HDVs departing the site throughout the day. As such, the estimated traffic generation of the proposed development is insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network. <u>Gas Mains and Power Lines</u> Wales and West Utilities were consulted as part of the Pre-Application Consultation. In response to their comments, Hale and CB3 met with Wales and West on site to address the concerns raised, and CB3 have prepared a short statement outlining what has been done to address Wales and West's comments. This statement accompanies this planning submission.
Water pressure is already low, especially at peak times, and is expected to worsen with the addition of 153 new homes. The existing water supply system is old and strained, and frequent outages have been reported. There are concerns about whether the current infrastructure can handle the increased demand.	In terms of potable water, a Hydraulic Modelling Assessment (HMA) has been undertaken and a solution has been identified. An updated Drainage Strategy has been prepared to address the outcomes of the HMA.
The local sewerage and waste management systems are already under strain, with failures and outages reported in certain areas. The development will place additional pressure on these systems, potentially leading to more interruptions, flooding, and contamination risks. There are also concerns about the drainage system's capacity to handle the increased wastewater and stormwater, especially with existing issues in Crymlyn Parc.	As part of this pre-application consultation, Welsh Water were consulted. They note that foul flows generated by the proposed development can be accommodated within the public sewerage system. In terms of surface water drainage, Welsh Water have no objection to the proposed drainage strategy prepared at pre-application consultation stage.

Road safety is a concern, especially with construction vehicles, delivery vans, and residents' cars increasing traffic. No plans have been presented to repair or improve the local roads, which are already showing signs of subsidence and damage	A Construction management Plan will be prepared to support the construction stage of the project should planning permission be granted. The Transport Assessment considers the condition of the existing road infrastructure in the vicinity of the site.
The current electricity supply is under strain, with frequent power cuts reported in nearby areas. The new development will likely overload the infrastructure, leading to more frequent power outages.	Utilities companies have been consulted as part of the application and have not objected on these grounds.
Other Comments (34 concerns raised)	
There are questions regarding the proposed mix of social housing versus private sale, with some residents concerned that an emphasis on social housing could lower property values. Additionally, concerns about the long-term upkeep of communal areas, especially for leasehold apartments, may result in varying standards between freehold and leasehold properties	In terms of the proposed housing mix, the accompanying Planning Statement notes that the proposed layout has been designed following an extensive review of the surrounding area. The layout utilises a mix of apartments and houses that are designed to respect the location of the site. The form of the layout, using semidetached and terraced dwellings in a linear format, also reflects the prevailing character of the area. Also, following comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats. Furthermore, in relation to affordable housing, paragraph 6.18 of the Planning Statement explains that whilst the proposed development will provide in excess of the required affordable housing provision, it will provide a balanced mix of shared owner-ship, intermediate rent and social rent tenures. This will ensure that the community is well balanced. In terms of the long-term upkeep of communal areas for the affordable housing, Pobl Group will manage this.
The development is seen as conflicting with national and local planning policies, such as the Planning Policy Wales (PPW) and the Well-being of Future Generations (Wales) Act 2015. The development also fails to meet criteria for building on designated green spaces and lacks sustainable building practices or green energy solutions. Residents are concerned about the absence of electric vehicle (EV) chargers, which may hinder future environmental preparedness. Moreover, the development is seen	Please see the Appraisal section of the accompanying Planning Statement for further information on how the proposals adhere to local and national planning policies.

as contributing to worsening local traffic and air quality.	
The local water table is already problematic, with concerns that the development will worsen flooding and water management issues, particularly near Coedffranc cemetery and Crymlyn Parc. There is insufficient infrastructure to handle the increased drainage needs, especially regarding Sustainable Urban Drainage Systems (SUDS). The development may also disrupt local farming activities, notably at Pentwyn farm, which is vital to the community.	A drainage strategy has been prepared in support of the application and the proposals will be subject a formal SAB process in consultation with the Council's Drainage officers.
There is dissatisfaction with the insufficient consultation with the local community, which is viewed as a failure to properly engage existing residents. Concerns are raised that the development prioritizes council tax revenue over residents' welfare, offering no tangible benefits to the local community.	In accordance with Part 1A of The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 ("the 2016 Order"), all major developments are required to be subject to pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority. The 2016 Order confirms that any 'Pre-Application Consultation' exercise would be required to undertake the following steps prior to compiling the PAC Report; • Undertake publicity before application for Planning Permission (Section 2C) - By displaying a site notice (Schedule 1B) in at least one place on or near the land to which the proposed application relates for not less than 28 days; - By serving notice (Schedule 1B) to any owner or occupier of any land adjoining the land to which the proposed application relates; and - By making a draft valid planning application information available publicly for no less than 28 days. As per the guidance, when this takes the form of a webpage where the requisite information is freely available, the applicant must advertise a local library where residents are able to access the documents online. • Consult before applying for Planning Permission (Section 2D) - By serving notice (Schedule 1B) on community consultees; and - By serving notice (Schedule 1C) on specialist consultees. In accordance with Section 2C of the 2016 Order, the applicant has undertaken appropriate publicity by way of: ▪ Displaying a site notice for a period of no less than 28 days from the 8th November 2024 to the 6th December 2024 inclusive. Photo evidence of this can be found in Appendix A of this PAC Report. ▪ Giving requisite notice to owners/occupiers of any land adjoining the application site. A full list of neighbours can be found in Appendix B of this PAC Report.

- Made the full draft planning package available for inspection on Asbri Planning's website from the 8th November 2024 until the 6th December 2024 inclusive. Computer facilities were identified to view the application at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH.

Based on the above, it is clear that Asbri Planning have followed the requirements of Part 1A of The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 ("the 2016 Order").

Response to Community Consultees

Introduction

- 5.1 A full copy of all responses received from community consultees are contained within Appendix F. Please note that any personal data has been redacted for data protection purposes in accordance with the General Data Protection Regulation (GDPR).
- 5.2 The below tables provide a copy of the responses received, and the design teams responses to these comments;

Councillor Hellen Ceri Clarke and Councillor Cen Phillips

No comment/Objection/Objection/

Comment Cllr Cen Phillips and Cllr Hellen Clarke express strong opposition to a proposed development, citing several concerns:

1. **Traffic Assessment:** The traffic survey only accounts for two of four entrances to the Crymlyn Parc/Cae Morfa estate, missing important traffic data. The proposal's impact on Crymlyn Road and Serecold Avenue traffic should be further evaluated.
2. **Active Travel Routes:** The claim of adequate active travel routes is false, as key sections of pavement are missing. The developer should fund the installation of these facilities to ensure safe walking and cycling routes.
3. **Public Transport Accessibility:** The development lacks effective public transport links, with no nearby services for those without private vehicles, leading to isolation for residents, especially those with disabilities. The current bus services are inadequate, and the nearest train station is over half an hour away.
4. **Accident Record:** The report downplays safety concerns by citing only one injury incident. There have been numerous non-injury accidents and near misses due to speeding and parking issues.
5. **Development Location:** The site is greenfield land, while brownfield land at Coed Darcy, allocated for housing, remains undeveloped. Developing brownfield sites should be prioritized.
6. **Social Impact:** The proposed development's housing mix differs significantly from the established area, potentially disrupting the social fabric. The inclusion of three-story flats and a high level of social housing could unbalance the community.
7. **Loss of Open Space:** The development would destroy a vital local amenity, an open space used by residents for recreation. This space is particularly important given the lack of other local facilities.
8. **Environmental and Water Issues:** The development could exacerbate local water table issues, as the nearby cemetery has already experienced burial restrictions due to groundwater concerns. The potential impact on public health due to poor drainage and environmental contamination from nearby waste issues is also a concern.
9. **Electric Vehicle Charging and Amenities:** The lack of provisions for electric vehicle charging and additional amenities (shops, community centres, etc.) is noted. These are crucial to make the development more sustainable and cohesive with the existing community.
10. **Conclusion:** The councillors oppose the proposal, arguing that it would negatively affect neighbouring residents, increase traffic problems, reduce green space, and

fail to meet sustainability criteria for non-car-dependent living. They believe the development is not in line with local and national planning policies.

Response 1. **Traffic Assessment** – Additional surveys will be completed in March 2025 as this is considered a neutral month. Further information will be provided following the completion of the surveys. This arrangement has been agreed between Acstro and Neath Port Talbot's Highways Officers.

2. **Active Travel Routes** – It is not considered that the Planning Statement is misleading, it factually represents the active travel opportunities.
3. **Public Transport Accessibility** – There are a number of bus stops in the vicinity of the site. There are two within the Crymlyn Parc development and one Crymlyn Road. The bus stops provide access to service number 155 (Neath – Llandarcy Village via Skewen) which provides 5 daily services in each direction on Tuesdays and Thursdays.

The No. 38 (Swansea – Neath) service runs hourly, 7 days a week, and can be accessed from the bus stops located near the Crymlyn Road / Pen yr Alley Avenue junction, some 1200m / 16 minutes walk from the application site.

Skewen railway station is approximately 2km / 30 minutes walk from the site. Bus service 155 described above provides a convenient link between the development site and the railway station. Skewen railway station is on the South Wales mainline, which provides hourly services to Swansea and Cardiff.

Neath and Swansea stations also provide access to mainline services and can both be reached within a reasonable cycle journey. As such, it is considered that the site is located in a sustainable location.

4. **Accident Record** – It is not considered that the proposal will give rise to any significant risk to highway safety. This has been considered and addressed within the supporting Transport Assessment which will be considered by the Local Highway Authority.
5. **Development Location** - Whilst it is acknowledged that the proposals will lead to the loss of a parcel of greenfield land, the site is allocated for housing under LDP Policy H1 (Housing Sites). This means the site has undergone prior screening by the local planning authority to ensure the site's suitability for residential development.
6. **Social Impact** - In terms of the proposed housing mix, the accompanying Planning Statement notes that the proposed layout has been designed following an extensive review of the surrounding area. The layout utilises a mix of apartments and houses that are designed to respect the location of the site. The form of the layout, using semidetached and terraced dwellings in a linear format, also reflects the prevailing character of the area. Also, following comments received during the pre-application consultation period, the three storey flats have been reduced to two-storey walk-up flats.

Furthermore, in relation to affordable housing, paragraph 6.18 of the Planning Statement explains that whilst the proposed development will provide in excess of

the required affordable housing provision, it will provide a balanced mix of shared owner-ship, intermediate rent and social rent tenures. This will ensure that the community is well balanced.

7. **Loss of Open Space** - The application site is an unallocated area of private agricultural land and is not allocated for leisure purposes. Rather, the site is allocated as a Housing Allocation (Policy H1) in the adopted (2016) Neath Port-Talbot LDP. An area of amenity grassland will remain on land that adjoins the southern boundary of the site, where the existing play area is located. Furthermore, Skewen Park, which has a range of sporting facilities, is located some 1.6km to the east of the site.
8. **Environmental and Water Issues** – A drainage strategy has been prepared in support of the application and the proposals will be subject a formal SAB process in consultation with the Council's Drainage officers.
9. **Electric Vehicle Charging and Amenities** – The impact of the development on local infrastructure and services will be considered by the LPA during the planning application process. However, the site has undergone rigorous testing through the Local Development Plan process and is an allocated site for residential purposes. Pobl will consider the incorporation of EV charging through the detailed design.

Response to specialist consultees

- 6.1 The following comments have been received following consultation with the required specialist consultees. A full copy of the representations received can be reviewed at Appendix G. Please note that any personal data has been redacted for data protection purposes in accordance with the General Data Protection Regulation (GDPR).

Canal and River Trust

No comment

Comment This scheme does not meet the criteria for consultation with us as set out in the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. We are therefore returning the consultation to you.

Response Comment noted. No action required.

Coal Authority

No comment

Comment We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make.

Response Comment noted. No action required.

Welsh Water

Comments

Comment Public Sewerage Network

The proposed development site is located in the immediate vicinity of a separate sewerage system, comprising foul and surface water public sewers, which drains to Afan New Works Wastewater Treatment Works (WwTW).

Surface Water Drainage

We acknowledge the 'Proposed Drainage Strategy' (Drawing No. C-SK03 Rev. E) indicates proposals to dispose surface water flows to an existing watercourse and, in principle, we offer no objection.

In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

Foul Water Drainage – Sewerage Network

We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. We advise that the flows should be connected to the combined sewer between manholes SS71965803 and SS71965802 located to the south-east.

Foul Water Drainage – Sewerage Treatment

No problems envisaged.

Potable Water Supply

The water supply system in the immediate vicinity has insufficient capacity to serve the development and will also cause detriment to existing customers' water supply. A hydraulic modelling assessment is required to establish the scope of any reinforcement works to be completed at the same time as the provision of new water mains to serve the new development under Section 41 and Section 51 of the Water Industry Act (1991).

With respect to the draft form, we acknowledge that this planning application is submitted on behalf of Hale Group who have previously commissioned Welsh Water to undertake a hydraulic modelling assessment and a report has been issued in relation to necessary off-site reinforcement works to the potable water supply network. Such works may entail a connection point to the Windmill Hill SRV located at 268275,195448, or installation of a suitably sized length of main between separate networks to the east and west of the site. We welcome further engagement with the developers on this matter.

Response Public Sewerage Network

Comments noted.

Surface Water Drainage

Comments noted.

Foul Water Drainage – Sewerage Network

Comments noted.

Foul Water Drainage – Sewerage Treatment

Comments noted.

Potable Water Supply

Comments noted. A hydraulic modelling assessment has been undertaken by DCWW on behalf of the client, and further information regarding a way forward is provided by CB3 in the accompanying Drainage Strategy.

Fire and Rescue Service

No Comment

Comment The Fire Authority has no comment to make on access for fire appliances or water supplies.

The Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation.

Response Comments noted, no action required.

Trunk Roads

Objection – More information required

Comment The applicant must provide the following information to support any future planning application at the site:

1. A revised Transport Assessment (TA) to include detailed traffic modelling of the M4 junction 43 to check capacity. The assessment should be undertaken to include any high seasonal variations (if appropriate) and AM / PM peak hour flows on the trunk road network.

Committed housing development in the immediate vicinity at Coed Darcy, should be included. If the junction capacity for the worst-case scenario is observed to be operating above the theoretical Ratio of Flow Capacity (RFC) value of 0.85, the applicant would be required to supply proposals to alleviate capacity concerns mitigating the developments impact. Alternatively, reasoning for its acceptability should be supplied for our full consideration.

Response Comments noted. Acstro have liaised directly with the Trunk Road Agency to discuss these matters in further detail, and have amended their Transport Assessment accordingly to address their comments.

Health and Safety Executive

Objection

Comment The assessment indicates that the risk of harm to people at the proposed development site is such that HSE's advice is that there are sufficient reasons on safety grounds, for advising against the granting of planning permission in this case.

As the proposed development is within the Consultation Distance of a major hazard pipeline you should consider contacting the pipeline operator before deciding the case. There are two particular reasons for this:

1. The operator may have a legal interest (easement, wayleave etc.) in the vicinity of the pipeline. This may restrict certain developments within a certain proximity of the pipeline.
2. The standards to which the pipeline is designed and operated may restrict occupied buildings or major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline, or its operation, if the development proceeds.

Response Comments noted. CB3 have contacted the pipeline operator, Wales and West Utilities to discuss matters further. Both Hale and CB3 met with Wales and West on site to address the concerns raised, and CB3 have prepared a short statement outlining what has been done to address Wales and West's comments. This statement accompanies this planning submission.

NRW

Comments

Comment We have concerns with the application as proposed because inadequate information has been provided.

Protected Sites

1. PEA – Para 4.12 – Notes that there are no impact pathways to Crymlyn Bog SAC, but no information has been submitted in regards to impacts on the site through both hydrological and air quality pathways.

2. The risk of pollutants either as a result of construction or storm sewage overflow entering the watercourse as well as the SAC also needs to be considered.

Contaminated Land

3. Having reviewed the GGR Report, they note that further site characterisation and sampling is required (soils and groundwater). They are satisfied that this aspect can be controlled by the following conditions:

Condition 1

No development or phase of development at the Land North of Crymlyn Parc suspected of contamination, shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Condition 2

Prior to the occupation or operation of the development, a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Condition 3

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Waste

A previously permitted landfill is located close to the northern boundary of the development site. They advise that you consult with the Local Authority's Environmental Health and Building Control departments to ensure that any risk from landfill gas can be acceptably managed.

Pollution Prevention

Condition 4

No development or phase of development, including site clearance, shall commence until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed;
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (ofspoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures; measures to control light spill and the conservation of dark skies.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities

- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Response Comments noted. Hawkeswood Ecology have prepared a revised PEA to address the comments raised by NRW, which accompanies this planning application submission.

Agricultural Land

Comments

Comment Thank you for the formal request for a pre-application consultation response under Article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2016, concerning agricultural land quality and the application of Best and Most Versatile (BMV) agricultural land policy (PPW paragraph 3.58 and 3.59). This advice relates to technical information only, not the merits or otherwise of the proposal on which it is for the determining authority to take a view (TAN6; Annex B6).

1. Agricultural Land Classification (ALC) - Information.

The Department does not hold any information on detailed ALC field surveys for the site. According to the Predictive ALC Map for Wales, the site is considered ALC Subgrade 3a (BMV).

2. Agricultural Land Classification (ALC) – Advice:

The Department does not recommend a field survey is undertaken nor application of PPW para 3.58 and 3.59. The site is currently allocated as a Housing Allocation (Policy H1) in the adopted (2016) Neath Port-Talbot LDP, therefore BMV policy would have been considered for allocations as part of the LDP process.

Response Comments noted, no action required.

Local Authority Highways and SAB Officer

Comments

Comment In principle I have no objection to the proposal of a residential development at this location, however I have concerns over the design of the layout as listed below.

Highways Observations

1. Need to consider active travel.
2. Gradient and size/length of shared drives.

3. Parking allocation rates – requesting a plan to be provided showing which spaces are for which properties.
4. Need to cross reference parking areas.
5. Recommended driveway dimensions.
6. Courtyard parking car space dimensions.
7. Garage dimensions.
8. Forward visibility splays to be annotated on the plans.
9. Vehicular visibility splays at junctions to be annotated on the plans.
10. Street Lighting Design required.
11. Details of proposed gradients throughout the site are required.
12. Traverse lengths on turning heads should not exceed the requirements within our design guide.
13. Pedestrian footpaths will need to be continued around all the turning head areas.
14. The footway should be a minimum of 2m this is not currently maintained throughout the site.
15. The back of footpath radii at the junctions within the site, shall be a 5.7 metres radii and a 6 metres kerb radii.
16. The location of the parking for some properties need to be reorganised to reduce the walking distance from the property to the parking space.
17. Pedestrian crossing points will be required to be shown on the plans provided.
18. Please provide an adoptable highway drawing to be reviewed.
19. Auto-tracking will need to be provided for the S bend in the centre of the scheme, to ensure two-way traffic can pass safely. Please also provide the CAD files to confirm the auto-tracking is correct.
20. If any alterations are required to the existing adopted highway network as a consequence of this development, it shall be subject to the Road Safety Audit process.
21. There is a length of unrestrained highway that is excess of the maximum 60m, in other areas of the site, narrowing of the carriageway has been used, please consider this for this location also.

Transport Assessment

1. All traffic count surveys should be undertaken over a 7 day period in a neutral month, only one day of survey has been provided at this time.
2. The other access point has not be surveyed to ensure that there if no issues at this point currently, Serecold Avenue onto Crymlyn Road. No consultation or Scoping for TIA survey locations have been agreed by the Council and therefore this should be undertaken prior to additional surveys taking place.
3. Please review how the development has been included within the growth factors, this should be added to the baseline prior to the growth factor.

Drainage

1. SAB approval will be required prior to any work commencing.
2. Should any springs or ground water seepage be encountered the on-site works in that area shall cease until a scheme for collection and disposal of the water has been submitted to and approved in writing by the Local Planning Authority. No ground water shall ever be discharged into the proposed drainage scheme.
3. There must be no interference, alteration or diversion of any ditch, watercourse, stream or culvert crossing or bordering the site, without prior consultation and agreement with the Authority.

4. Unless otherwise agreed in writing by the Local Planning Authority, foul water and surface water discharges shall be drained separately from the site.
5. No surface water or Land drainage run-off shall be allowed to connect, either directly or indirectly, to the public sewerage or Highway surface water system unless otherwise approved in writing by the Local Planning Authority.
6. Adequate provision shall be made for the drainage of the site, to ensure that the drainage of any adjoining land is not interrupted or otherwise adversely effected by the development during the life time of construction.

Response Highways Observations

1. Active travel has been considered as part of the proposals.
2. This information will be provided at Reserved Matters stage.
3. This information will be provided at Reserved Matters stage.
4. The number of parking spaces provided for each property type is in line with Neath Port Talbot's parking standards.
5. Spring Design confirm that the parking spaces meet the recommended dimensions outlined above.
6. Spring Design confirm that the parking spaces meet the recommended dimensions outlined above.
7. Spring Design confirm that the internal dimensions of the garages are 6m in length and 3m in width.
8. Forward visibility splays will be provided within the Transport Assessment.
9. Vehicular visibility splays at junctions will be provided within the Transport Assessment.
10. Street lighting design will be finalised at Reserved Matters stage.
11. This information will be provided at Reserved Matters stage.
12. The maximum traverse lengths are not specified within Neath Port Talbot County Borough Council's Design Guide. The layout design will be finalised at Reserved Matters stage.
13. It is not considered that an extension to the pedestrian footpath is required at this location as existing dwellings to the south of the site cannot access the site from this location.
14. The architect has reviewed the illustrative masterplan and can confirm that the width of all footpaths is 2m.
15. All junction inner kerb radii have been redesigned to 8m, with the outer kerb measuring 6m.
16. Spring Design note that only a handful of units will have parking to the rear. These plots will have rear access paths, thus reducing the walking distance from the property to the parking space.
17. Pedestrian crossing points will be provided within the Transport Assessment.
18. An adoptable highway drawing will be prepared at Reserved Matters stage.
19. Auto-tracking for the S-bend will be provided in the Transport Assessment.
20. Comment noted.
21. Traffic calming measures have been implemented along sections of the highway that exceed 60m in length.

Transport Assessment

1. All traffic count surveys are to be completed in March 2025 as this is considered a neutral month. Further information will be provided following the completion of the surveys.

2. Surveys on the other access point (Serecold onto Crymlyn Road) are to be completed in March 2025 as this is considered a neutral month. Further information will be provided following the completion of the surveys. This has been discussed and agreed between Acstro and the council's Highways Officers.
3. Scoping has been discussed and agreed with Highway Officers. Committed development traffic will be included within the highway capacity exercise being undertaken in March 2025.

Drainage

Comments noted.

Response to other consultees

- 7.1 The following comments have been received following consultation with the 'other' consultees listed at paragraph 3.6. A full copy of the representations received can be reviewed at Appendix H. Please note that any personal data has been redacted for data protection purposes in accordance with the General Data Protection Regulation (GDPR).

Heneb (Archaeology Trust)

Comments

Comment Overall, it is unlikely that significant archaeological material will be encountered during the works. As a result, should a similar application to the one you have outlined be submitted, we would be unlikely to recommend any pre-determination works or that any archaeological conditions be attached to any consent.

Response Comments noted, no action required.

Wales and West

Comments

Comment An intermediate / high pressure gain main(s) is located in proximity to the site. No excavations are to take place above or within 10m of the confirmed position of these mains without prior consultation with Wales and West Utilities.

Response Comments noted. Both Hale and CB3 met with Wales and West on site to address the concerns raised, and CB3 have prepared a short statement outlining what has been done to address Wales and West's comments. This statement accompanies this planning submission.

Secure by Design Officer

Comments

Comment To obtain Secured by Design Gold Award, the following comments were raised:

1. Site Layout

I am generally pleased with the site layout. All the vehicle parking bays are within curtilage/overlooked.

The only concerns I have is in respect of the footpaths adjacent to plots 53 – 76 and 140-144. These paths must be afforded as much natural surveillance as possible by adjacent properties and properties overlooking i.e. plots 90-95 by having appropriately placed windows in the homes. Views of the footpaths from the plots must not be blocked by trees.

2. Lighting

3. Boundary identification

4. Landscaping and planting

5. Vehicle parking

6. LAP

7. Side and rear boundaries

8. Garden sheds

9. Bin stores
10. Bicycle stores
11. Security lighting
12. Drainpipes
13. Blank walls
14. Public utilities
15. Access control
16. Door security
17. Window security
18. Intruder alarm system
19. Identification of properties

Response Comments noted. Spring Design have discussed the comments raised directly with the Secure by Design Officer, and can confirm that windows will face the proposed footpaths within the development, thus providing natural surveillance.

Conclusion

- 8.1. Asbri Planning have been instructed by Hale Group and Pobl Group to prepare a PAC Report to demonstrate that appropriate pre-application consultation has been carried out in respect of the proposed Outline Planning Application for the Development of up to 153no. Homes at Land North of Crymlyn Parc, Skewen, Neath.
- 8.2. This PAC Report is prepared in accordance with Part 1 Section 2F of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 ("the 2016 Order") and demonstrates how the applicant has complied with Section 61Z of the Town and Country Planning Act 1990 (as amended) ("the 1990 Act") and responded to the comments received from any interested party consulted under Section 61Z (3) or (4) of the 1990 Act.
- 8.3. As required by Sections 2C, 2D and 2E of the 2016 Order, the forthcoming application has been publicised, consulted upon and considered in accordance with the regulations.
- 8.4. Where appropriate, responses to comments received are provided in addition to details of any amendments to the application package/ proposal arising from the comments received.
- 8.5. In accordance with the above, it is considered that the requirements of Part 1 Section 2C, 2D, 2E and 2F of the 2016 Order have been satisfied.

Appendix A - Copy of Site Notice and map showing their location

Date: 8th November 2024

Our Ref: S24.149



Suite D, 1st Floor

220 High Street

Swansea

SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk

SITE NOTICE

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D

OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Purpose of this notice:

This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Asbri Planning Ltd. gives notice that Hale Group and Pobl Group are intending to apply for outline planning permission for the development of up to 153 no. homes; with all matters reserved at land north of Crymlyn Parc, Skewen, Neath.

You may inspect copies of:

- the proposed application;
- the plans; and
- other supporting documents

Online by visiting www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Dyddiad: 8fed Tachwedd 2024
Ein cyf: S24.149



Swit D, Llawr Cyntaf
220 High Street
Abertawe
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

HYSBYSIAD SAFLE

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO.

Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012 (Wedi diwygio)

ATODLEN 1 Erthygl 4. (4) ATODLEN 1B Erthygl 2C a 2D

Cais cynllunio amlinell am ddatblygiad hyd at 153 o dai; gyda phob mater wedi ei gadw

Tir i'r gogledd o Barc Crymlyn, Sgiwen, Castell-Nedd

Bwriad yr hysbysiad:

Mae'r hysbysiad yma yn rhoi cyfle i wneud sylwadau yn uniongyrchol i'r datblygwr ynglŷn â'r datblygiad arfaethedig cyn i gais am ganiatâd cynllunio cael ei gyflwyno i'r awdurdod cynllunio lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; bydd unrhyw sylwadau a ddarperir gennych wrth ymateb i'r hysbysiad yma ddim yn anfanteisio eich hawl i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir gennych yn y ffeil gyhoeddus.

Mae Asbri Planning Limited yn hysbysu bod Hale Group a Pobl Group yn bwriadu gwneud cais ar gyfer caniatad cynllunio amlinell am ddatblygiad hyd at 153 o dai; gyda phob mater wedi ei gadw ar y tir i'r gogledd o Barc Crymlyn, Sgiwen, Castell-Nedd.

Mae modd i chi archwilio copïau o'r canlynol:

- y cais arfaethedig;
- y cynlluniau; a
- dogfennau ategol eraill

Gallwch ddod o hyd i gopïau electronig drwy fynd i www.asbriplanning.co.uk/statutory-pre-application-consultation. Os nad ydych yn gallu cael mynediad at y dogfennau yn electronig, mae cyfleusterau cyfrifiadur ar gael yn Llyfrgell Sgiwen, Carnegie Hall, Evelyn Road, Sgiwen, Castell-Nedd Port Talbot, SA10 6LH. Mae'r llyfrgell ar agor yn ystod yr oriau canlynol: 9.30yb – 12.30yp a 2yp – 5.30yp (Dydd Llun, Mawrth a Iau), 9.30yb – 12.30yp a 2yp – 6.30yp (Dydd Gwener), 9.30yb – 12.30yp (Dydd Sadwrn), ac Ar gau (Dydd Mercher a Sul).

Dylai unrhyw sydd yn dymuno gwneud sylwadau ynglŷn â'r datblygiad arfaethedig ysgrifennu at yr asiant drwy ysgrifennu i mail@asbriplanning.co.uk neu Asbri Planning Ltd, Swit D, Llawr Cyntaf, 220 High Street, Abertawe, SA1 1NW erbyn 6ed Rhagfyr 2024.



Appendix B - List of the addresses of adjoining land owners and/or occupiers and a copy of the draft letter issued

Date: 8th November
Our Ref: S24.149

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

«Add1»
«Add2_»
«Add3»



Tel: 01792 480535
www.asbriplanning.co.uk

Dear Owner/Occupier

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Asbri Planning Ltd. has been commissioned by Hale Group and Pobl Group in respect of outline planning permission for the development of up to 153 no. homes; with all matters reserved at land north of Crymlyn Parc, Skewen, Neath. As the scheme constitutes a major development, a pre-application consultation period is required in order to provide those who may be interested in the proposals with an opportunity to view the draft application package and express their views.

Purpose of this notice:

This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

You may inspect copies of:

- the proposed application;
- the plans; and
- other supporting documents

Online at www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,



Ffion Goodland – Planner
Asbri Planning Ltd

Owner/Occupier	50 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	52 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	54 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	56 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	58 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	60 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	62 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	64 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	66 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	68 Crymlyn Parc	Neath, SA10 6DG
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Owner/Occupier	72 Crymlyn Parc	Neath, SA10 6DG
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Owner/Occupier	106 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	108 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	110 Crymlyn Parc	Neath, SA10 6DG
Owner/Occupier	112 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	114 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	116 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	118 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	120 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	122 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	124 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	126 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	128 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	130 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	132 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	134 Crymlyn Parc	Neath, SA10 6EF
Owner/Occupier	124 Cae Morfa	Neath, SA10 6EH

Owner/Occupier	126 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	128 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	130 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	132 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	134 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	136 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	138 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	140 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	141 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	142 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	143 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	144 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	145 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	146 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	147 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	148 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	149 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	150 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	151 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	152 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	153 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	154 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	155 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	156 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	157 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	158 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	159 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	160 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	161 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	162 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	163 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	164 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	165 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	166 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	167 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	168 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	169 Cae Morfa	Neath, SA10 6EE
Owner/Occupier	170 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	172 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	174 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	176 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	178 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	180 Cae Morfa	Neath, SA10 6EH
Owner/Occupier	Civic Centre	Port Talbot, SA13 1PJ

Owner/Occupier	Leeder Property Consultants Ltd	26 Walter Road, Swansea, SA1 5NN
Owner/Occupier	44 Doughty Street	London, WC1N 2LJ
Owner/Occupier	Pentwyn Farm	Skewen, Neath, SA10 6NL

Appendix C - Screenshot of the Asbri Planning Website

CRYMLYN PARC, SKEWEN, NEATH

[Home](#) » [Consultations](#) » [Statutory Pre-Application Consultation](#) » [Crymllyn Parc, Skewen, Neath](#)

CRYMLYN PARC, SKEWEN, NEATH



Asbri Planning Ltd. has been commissioned by Hale Group and Pobl Group to undertake pre-application consultation in respect of an Outline planning application for the development of up to 153 no. homes; with all matters reserved at land north of Crymllyn Parc, Skewen, Neath.

We give notice that Hale Group and Pobl Group is intending to apply to Neath Port Talbot County Borough Council for the following development;

Outline planning application for the development of up to 153 no. homes; with all matters reserved

Prior to formal submission to the Local Planning Authority and in accordance with the requirements set out in Part 1A of the Town & Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended), the proposal will be subject to pre-application consultation.

All relevant drawings, reports and supplementary supporting documents are made available for inspection and review online below. If you are unable to access the documents electronically you may request copies of this information by emailing mail@asbriplanning.co.uk.

Anyone who wishes to make representations about this proposed development must do so by 6th December 2024. We would encourage you to e-mail these to mail@asbriplanning.co.uk, alternatively please download the [attached form](#), and send them to;

Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW.

Supporting Documents

Plans

Architect

[Illustrative Masterplan](#)

[Location Plan](#)

[211 Floor Plans](#)

[211 Elevations](#)

[212 Floor Plans](#)

[212 Elevations](#)

[213 GF Floor Plans](#)

[213 FF Floor Plans](#)

[213 SF Floor Plans](#)

[213 Front & Side Elevations](#)

[213 Rear & Side Elevations](#)

[421 Floor Plans](#)

[421 Elevations \(Brick\)](#)

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[531 Floor Plans](#)

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[532 Floor Plans](#)

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[641 Floor Plans](#)

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[642 Floor Plans](#)

[642 Elevations \(Brick\)](#)

[642 Elevations \(Render\)](#)

[Howard Floor Plans](#)

[Howard Elevations](#)

[Letchworth Floor Plans](#)

[Letchworth Elevations](#)

[Oakdale Floor Plans](#)

[Oakdale Elevations](#)

[Rhixwina Floor Plans](#)

[Rhixwina Elevations](#)

Engineering

[Proposed Drainage Strategy](#)

[Proposed Layout Plan](#)

[Vehicle Tracking Sheet 1 of 2](#)

[Vehicle Tracking Sheet 2 of 2](#)

Landscape

[Landscape Strategy](#)

[Planting Strategy](#)

[Play Strategy](#)

TCPO

[Topographical Survey 1 of 3](#)

[Topographical Survey 2 of 3](#)

[Topographical Survey 3 of 3](#)

Visuals

[Perspective 1](#)

[Perspective 2](#)

[Perspective 3](#)

[Perspective 4](#)

[Perspective 5](#)

[Perspective 6](#)

[Perspective 7](#)

[Perspective 8](#)

[Perspective 9](#)

Reports

[Air Quality Assessment](#)

[Design and Access Statement](#)

[Draft Application Form](#)

[Drainage Technical Note](#)

[Preliminary Ecological Appraisal & Tree Bat Roost Potential Assessment](#)

[Green Infrastructure Statement](#)

[Noise Impact Assessment](#)

[Planning Statement](#)

[Geotechnical & Geoenvironmental Report](#)

[Addendum to Geotechnical & Geoenvironmental Report](#)

[Transport Assessment](#)

[Archaeological Report](#)

[Waste Management Plan](#)

◀ PREVIOUS

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☎ 029 2073 2652

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Website developed by **spindogs**®

Appendix D - Copy of all notices issued to community consultees (Schedule 1B)

Date: 8th November 2024

Our Ref: S24.149

Councillor Helen Ceri Clarke
97 Crymlyn Parc
Skewen
Neath
SA10 6EF

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk



Dear Councillor Helen Ceri Clarke

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Asbri Planning Ltd. gives notice that Hale Group and Pobl Group are intending to apply for outline planning permission for the development of up to 153 no. homes; with all matters reserved at land north of Crymlyn Parc, Skewen, Neath.

You may inspect copies of:

- the proposed application;
- the plans; and,
- other supporting documents

Online by visiting www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Date: 8th November 2024

Our Ref: S24.149

Councillor Cen Phillips
Port Talbot Civic Office
Port Talbot
SA13 1PJ

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk



Dear Councillor Cen Phillips

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Asbri Planning Ltd. gives notice that Hale Group and Pobl Group are intending to apply for outline planning permission for the development of up to 153 no. homes; with all matters reserved at land north of Crymlyn Parc, Skewen, Neath.

You may inspect copies of:

- the proposed application;
- the plans; and,
- other supporting documents

Online by visiting www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Date: 8th November 2024

Our Ref: S24.149

Councillor Mike Harvey
28 Hill Road
Neath Abbey
Neath
SA10 7NR

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk



Dear Councillor Mike Harvey

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Asbri Planning Ltd. gives notice that Hale Group and Pobl Group are intending to apply for outline planning permission for the development of up to 153 no. homes; with all matters reserved at land north of Crymlyn Parc, Skewen, Neath.

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- the proposed application;
- the plans; and,
- other supporting documents

Online by visiting www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Date: 8th November 2024

Our Ref: S24.149

Alyson Anthony
Democratic Services
Guildhall
Swansea
SA1 4PE

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk



Dear Alyson Anthony

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Asbri Planning Ltd. gives notice that Hale Group and Pobl Group are intending to apply for outline planning permission for the development of up to 153 no. homes; with all matters reserved at land north of Crymlyn Parc, Skewen, Neath.

You may inspect copies of:

- the proposed application;
- the plans; and,
- other supporting documents

Online by visiting www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Date: 8th November 2024

Our Ref: S24.149

Ryland Doyle
Democratic Services
Guildhall
Swansea
SA1 4PE

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk



Dear Ryland Doyle

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Asbri Planning Ltd. gives notice that Hale Group and Pobl Group are intending to apply for outline planning permission for the development of up to 153 no. homes; with all matters reserved at land north of Crymlyn Parc, Skewen, Neath.

You may inspect copies of:

- the proposed application;
- the plans; and,
- other supporting documents

Online by visiting www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Date: 8th November 2024

Our Ref: S24.149

Matthew Jones
Democratic Services
Guildhall
Swansea
SA1 4PE

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk



Dear Matthew Jones

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
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Purpose of this notice:

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- other supporting documents

Online by visiting www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Date: 8th November 2024

Our Ref: S24.149

Penny Matthews
Democratic Services
Guildhall
Swansea
SA1 4PE

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk



Dear Penny Matthews

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

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Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Date: 8th November 2024

Our Ref: S24.149

Councillor Nathan Goldup-John
Port Talbot Civic Office
Port Talbot
SA13 1PJ

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk



Dear Councillor Nathan Goldup-John

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

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- other supporting documents

Online by visiting www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Date: 8th November 2024

Our Ref: S24.149

Councillor Angharad Rebecca Aubrey
Port Talbot Civic Office
Port Talbot
SA13 1PJ

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk



Dear Councillor Angharad Rebecca Aubrey

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

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- other supporting documents

Online by visiting www.asbriplanning.co.uk/statutory-pre-application-consultation. For those without access to the internet, computer facilities are available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath Port Talbot, SA10 6LH. The library is open during the following hours: 9.30am – 12.30pm and 2pm – 5.30pm (Monday, Tuesday and Thursday), 9.30am – 12.30pm and 2pm – 6.30pm (Friday), 9.30pm – 12.30pm (Saturday) and Closed (Wednesday and Sunday). Anyone who wishes to make representations must write to the agent at mail@asbriplanning.co.uk or Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Date: 8th November 2024

Our Ref: S24.149

Louise Thomas - Clerk
Memorial Hall, Skewen Park (off Wern Road)
Skewen
Neath
SA10 6DP

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk



Dear Louise Thomas - Clerk

**PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION
TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)
SCHEDULE 1 ARTICLE 4. (4) SCHEDULE 1B ARTICLES 2C & 2D
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

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- the proposed application;
- the plans; and,
- other supporting documents

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Yours Sincerely,



**Ffion Goodland – Planner
Asbri Planning Ltd**

Appendix E - Copy of all notices issued to specialist consultees (Schedule 1C)

Date: 8th November 2024

Our Ref: S24.149

Adjoining Local Planning Authority
Planning@swansea.gov.uk

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

**OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

This notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (As Amended).

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In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to the agent at mail@asbriplanning.co.uk or to Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

The Health and Safety Executive
online app

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED

LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

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Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner

Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Trunk Road Agency
LGC_Development_Control-South@gov.wales

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

**OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

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Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Local Highway Authority
j.griffiths4@npt.gov.uk

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

**OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

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Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Local Highway Authority
hdc@npt.gov.uk

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

**OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

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Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

The Coal Authority
planningconsultation@coal.gov.uk

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

**OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

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Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Natural Resources Body for Wales
swplanning@cyfoethnaturiolcymru.gov.uk

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

**OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

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Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Cadw
cadwplanning@gov.wales

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED

LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

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Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner

Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

The water and sewerage undertaken concerned
developer.services@dwrcymru.com

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

**OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL MATTERS RESERVED
LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH**

Purpose of this notice:

This notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (As Amended).

Asbri Planning Ltd. gives notice that Hale Group and Pobl Group are intending to apply for outline planning permission for the development of up to 153 no. homes; with all matters reserved at land north of Crymlyn Parc, Skewen, Neath.

A copy of the proposed application; plans; and other supporting documents can be viewed online at <http://www.asbriplanning.co.uk/statutory-pre-application-consultation/>.

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to the agent at mail@asbriplanning.co.uk or to Asbri Planning Ltd, Suite D, 1st Floor, 220 High Street, Swansea, SA1 1NW by 6th December 2024.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Rail Network Operator
trawscymrufeedback@tfw.wales

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

TOWN AND COUNTY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 (AS AMENDED)

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Yours Sincerely,

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Ffion Goodland – Planner

Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Rail Network Operator
assetprotectionwales@networkrail.co.uk

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

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Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Rail Network Operator
contact@tfw.wales

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

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Ffion Goodland – Planner

Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Rail Network Operator
planningconsultations@tfw.wales

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

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Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Fire and rescue

South Wales: Firesafety@southwales-fire.gov.uk

Suite D, 1st Floor

220 High Street

Swansea

SA1 1NW

Tel: 01792 480535

www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

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Yours Sincerely,



Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Fire and rescue
bregs@mawwfire.gov.uk

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

SCHEDULE 1C ARTICLE 2D

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Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. Goodland'.

Ffion Goodland – Planner

Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

The Canal and River Trust
NationalPlanning.function@canalrivertrust.org.uk

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

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Ffion Goodland – Planner
Asbri Planning Ltd

Date: 8th November 2024

Our Ref: S24.149

Agricultural Land
lqas@gov.wales

Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Tel: 01792 480535
www.asbriplanning.co.uk

Dear Sir/Madam

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Yours Sincerely,

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Ffion Goodland – Planner
Asbri Planning Ltd

Appendix F - Responses received from community consultees

Observations on Statutory Pre- Application consultation – Crymlyn Parc, Skewen

I write on behalf of Cllr Cen Phillips and myself as the ward councillors for the proposed development. We have several concerns which I trust you will take into consideration in your report.

Firstly, I will address the traffic assessment document. In it, you have only examined two of the four entrances to the Crymlyn Parc/Cae Morfa estate. By not including the two entrances/exits in Serecold Avenue there is a large proportion of traffic activity that you have failed to capture.

This makes a nonsense of your traffic survey as there are a number of existing vehicles that you haven't counted and in doing so have not considered the possibility of vehicles using those entrances.

The amount of traffic using Crymlyn Road, and subsequently Serecold Avenue, should, in my opinion, also be monitored as the proposed development will significantly impact on the level of traffic using this main road.

You state that there are adequate active travel routes installed or being planned in the surrounding area. This information is untrue.

You will note that there are sections of pavement missing in Crymlyn Road, by the cemetery and towards the junction with Serecold Avenue that you have included in your active travel map.

Obviously if the developer would like to pay for these facilities to be installed then that can only be a good thing otherwise it cannot be true that there are safe routes for walking and cycling and such a statement should not be included as fact in your report.

Secondly, with regards to the issue of public transport, we have concerns about the desirability of placing a large social housing development, with no effective access to public transport, at least a half hour walk away from any amenities.

This in our view would lead to personal and financial isolation to those who have no access to private transport and actively discriminates against those with a disability.

The current bus connections are infrequent and would be unlikely to support people travelling to and from full time employment, for example. The train station is over a half hour walk away from the estate and with no joined up bus service would be unsuitable for those with reduced walking ability.

I would point out that there are no bus or train services on a Sunday either from, or to Skewen.

Placemaking states that *'building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other'*

While 'within walking distance' is vague and subjective, I would suggest that an hour's round trip to reach any local services or amenities stretches the idea beyond any kind of reasonable limits. The proposed development does not meet that standard in any way whatsoever.

You claim that '*easy access to public transport provision and local shops removes reliance on private vehicle ownership*'. This claim is fundamentally misleading.

Local public transport provision is poor. The nearest shops and facilities are not within what most would call reasonable walking distance. The existing active travel links to them are poor.

Residents of this proposed estate would be absolutely reliant on private vehicles, as are the residents of the two neighbouring estates. This is an estate at the very furthest edge of the residential area, and a long way from local facilities.

I take issue with the statement: "*There is one, slight, severity injury accident recorded on Cae Morfa. This occurred on 6th January 2018. This is evidently an isolated incident and the absence of a cluster of similar incidents provides confidence that there is no inherent safety issue at this location. There are no recorded injury collisions on Crymlyn Road nor at its junctions with Crymlyn Gardens or Crymlyn Parc. This indicates that the highway network that serves the site operates safely.*"

There have been numerous non-injury collisions and near misses around the estate with indiscriminate parking and speeding contributing to this. It is no coincidence that as Councillors we have repeatedly asked for yellow lines around junctions and that the Go safe camera van operates on the estate.

Thirdly, in relation to the Design and Access Statement, you state that the site is currently '*open pastureland*'. It is a green field site overlooking a vast tract of brownfield land at Coed Darcy, which has been allocated for housing, and as yet undeveloped.

The development of brownfield land should be prioritised. There is no need or reason to build on this greenfield site.

Fourthly, the established residential area is of a completely different mix and make-up from the proposed plan, which would unbalance the social fabric of the area.

Fifthly, you say that construction of a new access is required across open space at the southern boundary. This 'open space' is the ONLY local facility and amenity for all the residents in the existing residential area. They have no shops. They have no pubs. They have no church, or community centre, nor place to go for interaction or wellbeing. Nothing, apart from one very small park.

The proposal to largely obliterate the most usable part of that one tiny peaceful haven (much of which is steeply sloped and/or left uncut due to the presence of rare crickets on the site) to build an access road is appalling.

Your claim that the proposal would complete the development pattern of the local area is disputed. In fact, we believe that it would disrupt and unbalance local

communities with an inappropriate housing out of character with the surrounding area.

It seems somewhat ridiculous to try to claim that the proposed development will be *'perfectly in keeping with its surroundings'* while at the same time claiming that it will be *'a new development with its own unique character'*. Those two things are mutually exclusive.

The proposal includes three storey blocks of flats, which are entirely out of keeping with the surrounding area. Exceeding the 25% social housing level significantly risks unbalancing the social make-up of the residential area. It could create a place that is little more than isolated housing far from local amenities, creating potential problems for new residents and neighbouring existing residents alike.

Sixthly, on the provision of new SuDS scheme – given that there are already significant problems with the local water table resulting in burials being discontinued in the nearby cemetery to the south, draining more water into the landscape would seem unwise, to say the least.

The proposed site would appear to be a top of the hill location, above the existing housing, and would therefore presumably drain on both sides. I hope that the additional pressure of more housing has been considered in the light of the impact on public health given that the community council have been told that they cannot bury any more dead bodies because of groundwater.

There are further pollution issues impacting the groundwater such as the prosecution by NRW regarding potential hazardous waste on the Pentwyn Farm land (ref: [Natural Resources Wales / Three men sentenced for multi-million pounds illegal waste operations in Neath](#)) which has not been removed from the ground. The report was completed in May 2021 but the prosecution did not happen until December 2021 so I would be interested to know whether you were aware of this environmental breach and what plans for remediation you have.

Seventhly, on the design of the estate itself we were disappointed to see that no consideration has been given to ERV charging points at the properties. As it is anticipated that the number of electrically powered vehicles will increase and should be encouraged. We feel that access to charging points should be a mandatory requirement for all new developments.

We were also surprised that there appears to be no intention to provide additional amenities to the area, such as shops, cafes, community centres, highway upgrades etc. We believe that should you wish to progress with this proposal then these additional items should be included in your plans. It would go some way to give existing residents additional facilities and could help to foster community cohesion with a new community.

In conclusion, we oppose this proposal as it would have a detrimental impact on the lives of neighbouring residents via highways issues and loss of green space and the only local amenity site, and it does not meet a reasonable criterion of sustainability as a non-car dependent development. We believe that the scheme is not policy

compliant when considered against the relevant local and national level planning policies.

Appendix G - Responses received from specialist consultees

From: Arwel.Williams@gov.wales
Sent: 06 December 2024 16:22
To: Ffion Goodland; LQAS@gov.wales
Cc: Mail Asbriplanning
Subject: RE: SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C, 2D & 2G- LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Prynhawn da Ffion,

Apologies, I completely missed the site was allocated. Please see revised response below:

Re: Pre-application Consultation Response under Article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2016 – Land North of Crymlyn Parc, Skewen, Neath.

Thank you for the formal request for a pre-application consultation response under Article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2016, concerning agricultural land quality and the application of Best and Most Versatile (BMV) agricultural land policy (PPW paragraph 3.58 and 3.59). This advice relates to technical information only, not the merits or otherwise of the proposal on which it is for the determining authority to take a view (TAN6; Annex B6).

1. Agricultural Land Classification (ALC) - Information.

The Department does not hold any information on detailed ALC field surveys for the site. According to the Predictive ALC Map for Wales, the site is considered ALC Subgrade 3a (BMV).

2. Agricultural Land Classification (ALC) – Advice:

The Department does not recommend a field survey is undertaken nor application of PPW para 3.58 and 3.59. The site is currently allocated as a Housing Allocation (Policy H1) in the adopted (2016) Neath Port-Talbot LDP, therefore BMV policy would have been considered for allocations as part of the LDP process.

Cofion

Arwel

Arwel Wyn Williams
Uwch Arbenigwr, Dosbarthiad Tir Amaethyddol a Phridd / Senior Specialist, Agricultural Land Classification & Soil
Is-adran Tirweddau, Natur a Choedwigaeth / Landscapes, Nature and Forestry Division
Adran dros Newid Hinsawdd a Materion Gwledig / Department for Climate Change & Rural Affairs
Llywodraeth Cymru / Welsh Government
Ffôn / Tel: 0300 025 2052
E-bost: arwel.williams@llyw.cymru / E-mail: arwel.williams@gov.wales
Ar y We / Internet: www.llyw.cymru/priddoedd / www.gov.wales/soils



From: Ffion Goodland <Ffion@asbriplanning.co.uk>

Sent: 06 December 2024 15:57

To: LQAS <LQAS@gov.wales>; Williams, Arwel (LGHCRA - Climate Change and Env Sustainability - Landscapes, Nature & Forestry) <Arwel.Williams@gov.wales>

Cc: Mail Asbriplanning <mail@asbriplanning.co.uk>

Subject: RE: SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C, 2D & 2G- LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Dear Arwel,

Many thanks for your email below. Given that the site is allocated for residential development in Neath Port Talbot's adopted Local Development Plan under LDP Policy H1 (Housing Sites), does this have any bearing on your comments?

As the PAC deadline is today, I appreciate that it may not be possible for you to provide a response within the allocated timeframe. As such, if you could provide a response within the next week, that would be greatly appreciated.

Kind regards,
Ffion

Ffion Goodland – Planner 

Asbri Planning Ltd | T: 01792 480535 | W: <http://www.asbriplanning.co.uk>



Think before you print

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From: Arwel.Williams@gov.wales <Arwel.Williams@gov.wales> **On Behalf Of** LQAS@gov.wales

Sent: 02 December 2024 18:30

To: Mail Asbriplanning <mail@asbriplanning.co.uk>; LQAS@gov.wales

Subject: RE: SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C, 2D & 2G- LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Dear Ffion Goodland,

Re: Pre-application Consultation Response under Article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2016 – Land North of Crymlyn Parc, Skewen, Neath.

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1. Agricultural Land Classification (ALC) - Information.

The Department does not hold any information on detailed ALC field surveys for the site. According to the Predictive ALC Map for Wales, the site is considered ALC Subgrade 3a (BMV).

2. Agricultural Land Classification (ALC) – Advice:

[Planning Policy Wales \(PPW\)](#) paragraph 3.58 notes, ‘*Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC) is the best and most versatile, and should be conserved as a finite resource for the future*’.

As per the published [Predictive Map Guidance Note](#) (see flow chart on page 2 – copy attached for information), where the Predictive ALC Map identifies grades 1, 2 or 3a (BMV agricultural land), a survey will be required to determine grades present and in what proportion.

Planning applications are expected to be supported by survey evidence where BMV agricultural land is an issue for consideration, therefore it is recommended that an ALC field survey is undertaken for the site in line with the ‘[Guidelines and Criteria for Grading the Quality of Agricultural Land](#)’ (MAFF 1988). The Department would be available, if requested, to validate any ALC survey undertaken to support the application on behalf of the surveyor, applicant or LPA.

If an ALC survey confirms the presence of BMV land on site, the Department fully expects the policy (PPW paragraph 3.58 and 3.59) to be robustly addressed – in terms of how ‘considerable weight’ has been applied to protecting BMV, clear demonstration of ‘overriding need’ for the loss of BMV and that either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value which outweighs the agricultural considerations. Should any party refuse or neglect to commission a survey, or the survey is not accepted by the Welsh Government, the Predictive ALC Map Grade should be accepted as the best available information by the determining authority.

The Department would expect to be consulted by the LPA on any application on the site under Arrangements in TAN6, Annex B5 and B6.

3. Substantive Response.

As per Article 2E(2)(c) of the 2016 Order, the Department advises that, as a specialist consultee, that it has concerns in relation to the proposed development and how those concerns can be addressed.

Regards

Arwel Williams

Arwel Wyn Williams

Uwch Arbenigwr, Dosbarthiad Tir Amaethyddol a Phridd / Senior Specialist, Agricultural Land Classification & Soil
Is-adran Tirweddau, Natur a Choedwigaeth / Landscapes, Nature and Forestry Division

Adran dros Newid Hinsawdd a Materion Gwledig / Department for Climate Change & Rural Affairs

Llywodraeth Cymru / Welsh Government

Ffôn / Tel: 0300 025 2052

E-bost: arwel.williams@llyw.cymru / E-mail: arwel.williams@gov.wales

Ar y We / Internet: www.llyw.cymru/priddoedd / www.gov.wales/soils



From: Mail Asbriplanning <mail@asbriplanning.co.uk>

Sent: 08 November 2024 14:44

To: LQAS <lqas@gov.wales>

Subject: SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C, 2D & 2G- LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Dear Sir/madam

Please see attached Consultation for your attention

Kind regards

Kelly Davies

Business Support Manager

Asbri Planning Ltd | T: 02920 732652 | W: <http://www.asbriplanning.co.uk>



Cardiff | Swansea



Think before you print

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Ffion Goodland

From: National Planning Function <NationalPlanning.Function@canalrivertrust.org.uk>
Sent: 11 November 2024 11:09
To: Mail Asbriplanning
Subject: RE: SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C, 2D & 2G- LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Good morning,

Thank you for your pre-application consultation in respect of Land north of Crymlyn Parc, Skewen. The Canal & River Trust is potentially a specialist consultee in the mandatory pre-application process. However, this scheme does not meet the criteria for consultation with us as set out in the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

We are therefore returning the consultation to you. If for any reason you consider that you require the input of the Trust please let us know.

Should you have any queries please do not hesitate to contact us,

Sarah Steele
Planning and Data Support Technician
My working hours are Monday, Tuesday 8:00-16:30 and Friday 8:00-16:00

E planning@canalrivertrust.org.uk

Canal & River Trust
National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port CH65 4FW
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Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.

Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>

Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.

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The Coal
Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Asbri Planning Ltd

Neath Port Talbot County Borough Council

[By email: mail@asbriplanning.co.uk]

11 November 2024

Dear Asbri Planning Ltd

Re: PRE-APPLICATION Land North of Crymlyn Park

Outline planning application for the development of up to 153 no. homes with all matters reserved; LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Thank you for your notification of 8 November 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make.

However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant.

Yours

The Coal Authority Planning Team



Dŵr Cymru
Welsh Water

PPA0009052 Public Sewer Record



LEGEND(Representative of most common features)

Waste network	
	Foul chamber
	Surface water chamber
	Combined chamber
	Combined sewer overflow
	Special purpose chamber
	Treatment works
	Pumping station
	Outfall
	Lamp hole
	Storm overflow
	Rising main
	Gravity sewer
	Private sewer
	Private sewer subject to Sect. 104 adoption agreement
	Private Sewer Trans.
	Lateral Drain
	Inspection Chamber

Sewer (symbol colour indicates the type)
 Combined
 Surface water
 Foul
 Private Sewer Trans.
 Lateral Drain
 Inspection Chamber

Notes:

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

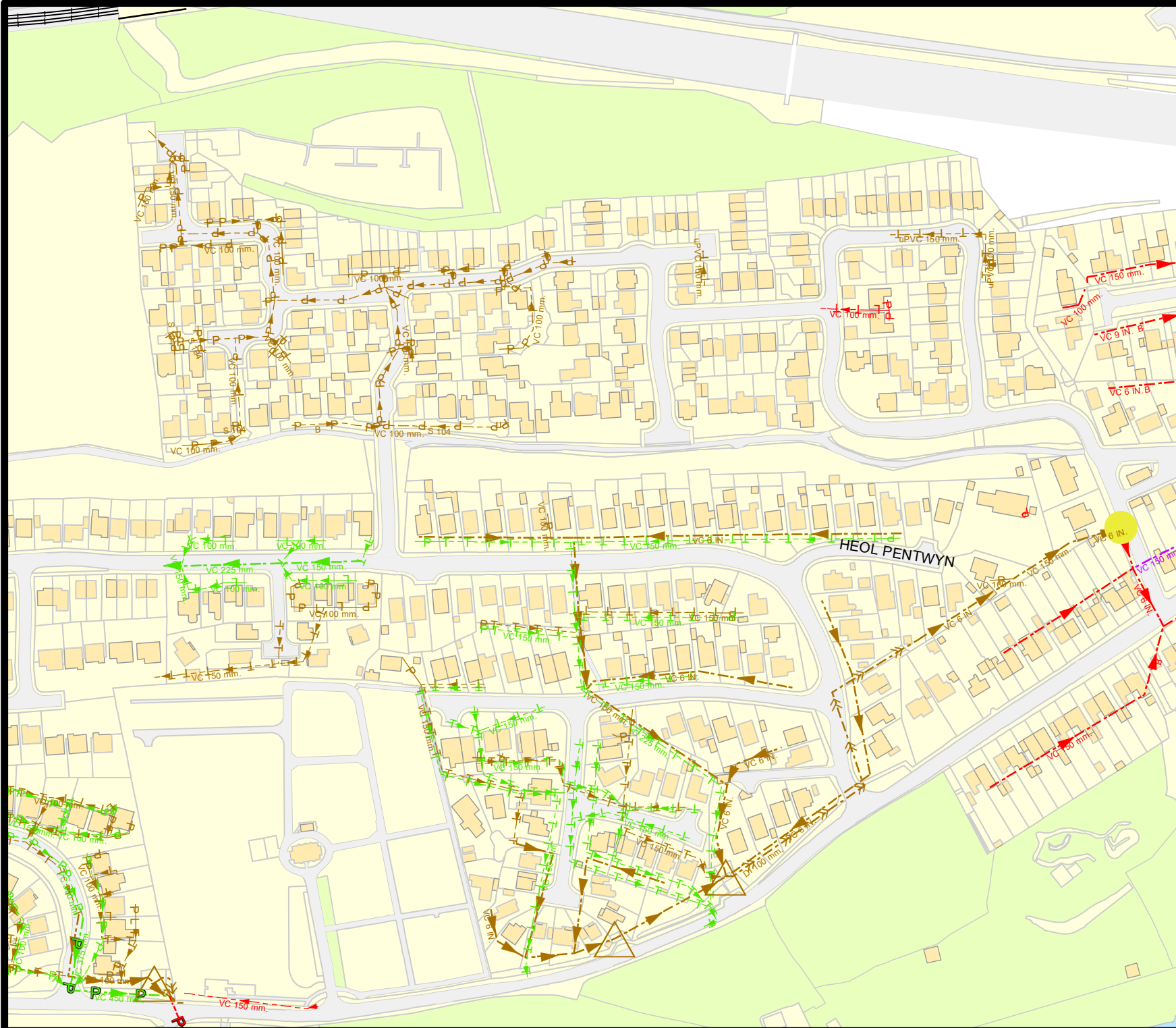
Order Cymeru Cyffwrdding (the Company) gives this information as to the position of its underground apparatus by way of general guidance only and is not the stated understanding that it is based on the best information available and no warranty as to correctness is relied upon in the event of excavations or other works made in the vicinity of the company's apparatus. The usual of locating apparatus before carrying out any excavations rests entirely on you. The information which is supplied by the Company, is done so in accordance with statutory requirements of sections 193 and 199 of the Water Industry Act 1991 and the Regulations made thereunder. It is not intended that this information should be relied upon for the purpose of any investigation. It should be noted that the records that are available to the Company may not disclose the existence of a water main, service pipe, sewer, lateral drain or disposal main and any associated apparatus laid before 1 September 1991, or any other structures or apparatus that may be installed or laid down after that date. It should be understood that the furnishing of this information is entirely without prejudice to the provision of the New Roads and Street Works Act 1991, or the Company's right to be compensated for damage to its apparatus.

Service pipes are not generally shown but their presence should be anticipated.

**EXACT LOCATIONS OF ALL APPARATUS
TO BE DETERMINED ON SITE.**

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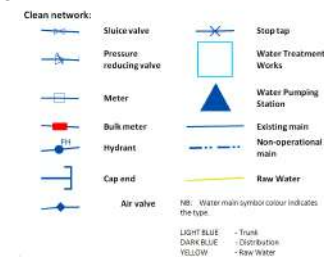


Dŵr Cymru
Welsh Water

PPA0009052 Water Main Plan



LEGEND



Notes:

Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

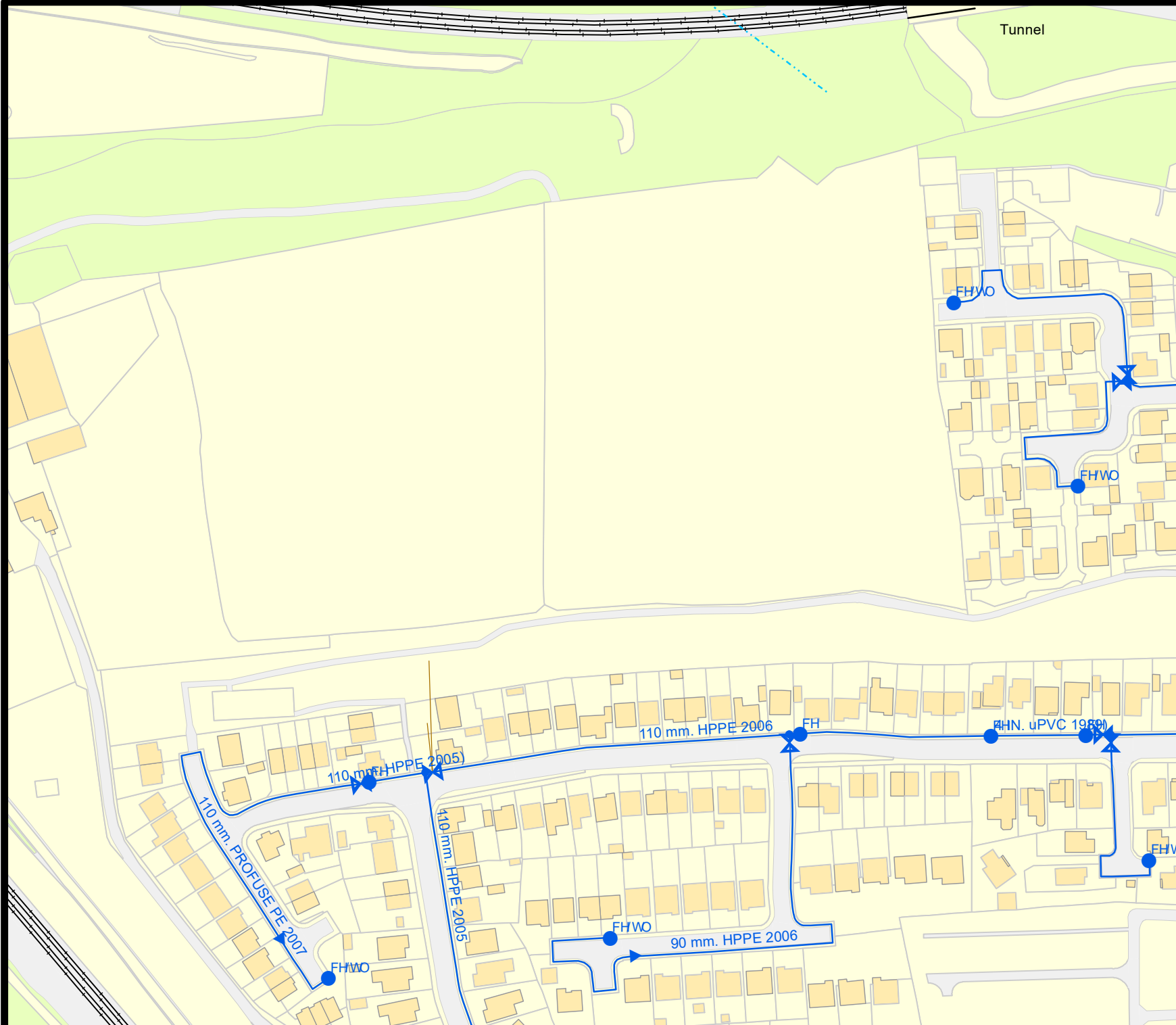
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Service pipes are not generally shown but their presence should be anticipated.

**EXACT LOCATIONS OF ALL APPARATUS
TO BE DETERMINED ON SITE.**

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Printed on: 21 Nov 2024



Asbri Planning
220 High Street
Swansea
SA1 1NW

Date: 21/11/2024
Our Ref: PPA0009052

Dear Sir/Madam,

Grid Ref: 270884 196981

Site Address: Land North of Crymlyn Parc, Neath

**Development: Article 2D - Outline Planning Application for The Development Of Up To 153 No. Homes;
With All Matters Reserved.**

I refer to your pre-planning enquiry received relating to the above site, seeking our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted I can provide the following comments which should be taken into account within any future planning application for the development.

Firstly, we note that the proposal relates to a residential development comprising 153 no. units on land North of Crymlyn Parc, Skewen, Neath and we acknowledge that the site is allocated (Ref: H1/9) within the Local Development Plan (LDP) for 150 no. units. In reference to our representations during the LDP consultation process, we can confirm that an assessment has been undertaken of the public sewerage and watermains systems to accommodate this development and informs our appraisal as follows.

PUBLIC SEWERAGE NETWORK

The proposed development site is located in the immediate vicinity of a separate sewerage system, comprising foul and surface water public sewers, which drains to Afan New Works Wastewater Treatment Works (WwTW).

You are also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

SURFACE WATER DRAINAGE

As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy which states that discharge to a combined sewer shall only be made as a last resort. Disposal should be made through the hierarchical approach, preferring infiltration and, where infiltration is not possible, disposal to a surface water drainage body in liaison with the Land Drainage Authority and/or Natural Resources Wales.

In this instance, we acknowledge the 'Proposed Drainage Strategy' (Drawing No. C-SK03 Rev. E) indicates proposals to dispose surface water flows to an existing watercourse and, in principle, we offer no objection. It is therefore recommended that the developer consult with Neath Port Talbot County Borough Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, DCWW is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation. Please refer to further detailed advice relating to surface water management included in our attached Advice & Guidance note.

In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

FOUL WATER DRAINAGE – SEWERAGE NETWORK

We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. We advise that the flows should be connected to the combined sewer between manholes SS71965803 and SS71965802 located to the south-east. Should a planning application be submitted for this development we will seek to control these points of communication via appropriate planning conditions and therefore recommend that any drainage layout or strategy submitted as part of your application takes this into account. However, should you wish for an alternative connection point to be considered please provide further information to us in the form of a drainage strategy, preferably in advance of a planning application being submitted.

You may need to apply to Dwr Cymru Welsh Water for any connection to the public sewer under Section 106 of the Water Industry Act 1991. However, if the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.



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Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

FOUL WATER DRAINAGE – SEWAGE TREATMENT

No problems are envisaged with the Wastewater Treatment Works for the treatment of domestic discharges from this site.

POTABLE WATER SUPPLY

The water supply system in the immediate vicinity has insufficient capacity to serve the development and will also cause detriment to existing customers' water supply. A hydraulic modelling assessment is required to establish the scope of any reinforcement works to be completed at the same time as the provision of new water mains to serve the new development under Section 41 and Section 51 of the Water Industry Act (1991).

With respect to the draft form, we acknowledge that this planning application is submitted on behalf of Hale Group who have previously commissioned Welsh Water to undertake a hydraulic modelling assessment and a report has been issued in relation to necessary off-site reinforcement works to the potable water supply network. Such works may entail a connection point to the Windmill Hill SRV located at 268275,195448, or installation of a suitably sized length of main between separate networks to the east and west of the site. We welcome further engagement with the developers on this matter.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,

Rhys Evans
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently, the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.



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Wales no 2366777. Registered office: Pentwyn Road,
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Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.



Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru
Mid and West Wales
Fire and Rescue Service

Prif Swyddog Tân | Chief Fire Officer

R.S. Thomas *KFSM BA(Hons) MSc*

Y Pencadlys, Heol Llwyn Pisgwydd,
Caerfyrddin, Sir Gâr, SA31 1SP
post@tancgc.gov.uk | tancgc.gov.uk

Headquarters, Lime Grove Avenue,
Carmarthen, Carmarthenshire, SA31 1SP
mail@mawwfire.gov.uk | mawwfire.gov.uk

0370 60 60 699

Asbri Planning
Suite D, 1st Floor
220 High Street
Swansea
SA1 1NW

Gofynner am/
Please ask for:
Rhif Est/Extn.
No.

Station Manager P. Phillips

E-bost/E-mail:

bregs@mawwfire.gov.uk

Fy Nghyf/My
Ref:

PP/KDT/00354776

Dyddiad/Date:

19th November 2024

Dear Sir / Madam,

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(WALES) ORDER 2012**

THE DEVELOPMENTS OF NATIONAL SIGNIFICANCE (PROCEDURE) (WALES) ORDER 2016

**DEVELOPMENT PROCEDURE (CONSULTEES) (WALES) (MISCELLANEOUS AMANDMENTS)
ORDER 2021 – FIRE AND RESCUE AUTHORITIES**

**RE: Development of up to 153No. Homes; with all matters Reserved – Land North of
Crymlyn Parc, Skewen, Neath**

APPLICATION NUMBER: N/A

I acknowledge receipt of the notification to the Mid and West Wales Fire and Rescue Authority in relation to the above application.

The site plan/s of the above proposal has been examined and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development:

- The Fire Authority has no comment to make on access for fire appliances or water supplies.
- The Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation.

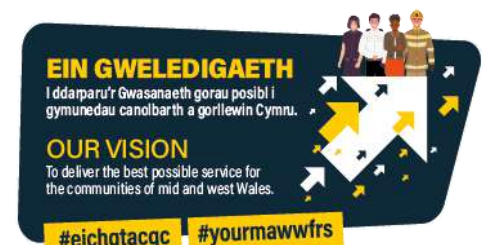
The developer should consider the need to provide adequate water supplies and vehicle access for firefighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following links: <https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>
<https://www.ukfrs.com/index.php/promos/16847>

Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg
- byddwn yn ymateb yn gyfartal i'r ddau ac yn ateb yn eich
dewis iaith heb oedi.

Rydym yn croesawu galwadau yn y Gymraeg a'r Saesneg.

We welcome correspondence in Welsh and English -
we will respond equally to both and will reply in your
language of choice without delay.

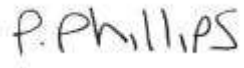
We welcome calls in Welsh and English.



Furthermore, the applicant should be advised to contact the appropriate Authority responsible for ensuring safety and compliance for these types of developments i.e., Health & Safety Executive / Local Authority Building Control.

The plan/s has been retained for record purposes.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P. Phillips'.

Station Manager P Phillips
Authorised Fire Safety Regulator
On behalf of the Mid and West Wales Fire and Rescue Authority

Enc

MID AND WEST WALES FIRE AND RESCUE SERVICE

Advice on Water Supplies

1. WATER SUPPLIES FOR FIREFIGHTING

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to care for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

Reference to the National Guidance Document on the Provision of Water for Fire Fighting 2007.

Access to Open Water Supplies

Where development of water-front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire and Rescue Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

1.1. HOUSING

Minimum main size 100 millimetres. Housing developments of units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.2. TRANSPORTATION

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100 millimetres. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

1.3. INDUSTRY

In order that an adequate supply of water is available for use by the Fire and Rescue Authority in case of fire, it is recommended that the water supply infrastructure to any commercial industrial estate is as follows:

Light Industrial/Commercial

Up to one hectare, 20 litres per second - Minimum Main Size 100 millimetres

Up to two hectares, 35 litres per second - Minimum Main Size 150 millimetres

High Risk Industrial

Up to three hectares 50 litres per second - Minimum Main Size 150 millimetres

Over three hectares, 75 litres per second - Minimum Main Size 150 millimetres

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site if they are capable of supplying the above flow rates for at least one hour.

The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high-risk premises may require a greater flow.

1.4. SHOPPING, OFFICES, RECREATION AND TOURISM

Commercial developments of this type should have a water supply capable of delivering a minimum of 20 to 75 litres per second to the development site. The Fire and Rescue Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements.

1.5. EDUCATION, HEALTH AND COMMUNITY FACILITIES

Village Halls

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

Primary Schools and Single Storey Health Centres

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

Secondary Schools, Colleges, Large Health and Community Facilities

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

1.6. DISTANCES BETWEEN FIRE HYDRANTS

The distance between fire hydrants should not exceed the following:

Residential areas	-	200 metres
Industrial Estates	-	150 metres
Town Centre Areas	-	90 metres
Commercial (Offices & Shops)	-	100 metres
Residential Hostels	-	Adjacent to access
Hotels	-	Adjacent to access
Institutional (Hospitals & Old Persons Home)	-	Adjacent to access
Old Persons Home	-	Adjacent to access
Educational (Schools & Colleges)	-	Adjacent to access

1.7. CONCLUSION

Developers should hold joint discussions with the relevant Water Authority or the Environmental Agency and the Fire and Rescue Authority to ensure that adequate water supplies are available in case of fire.

The Fire and Rescue Authority reserve the right to ask for static water supplies for firefighting on site, as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

The Town and Country Planning (Development Management Procedure)
(Wales) Order 2015 (as amended)

HEAD OF ENGINEERING & TRANSPORT

OBSERVATIONS

PAC APPLICATION NO: N/3/24/0012/00
APPLICANT: ASBRI PLANNING
LOCATION: CRYMLYN PARK, SKEWEN, NEATH
PROPOSAL: DEVELOPMENT OF 153 HOMES

The Highway/Drainage Authority, in responding to the above application, provides the following substantive response:

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐
SAB (SAB approval is required)	☒

MY OBSERVATIONS ON THIS PAC ARE AS FOLLOWS:-

The following documents are applicable to this submission:-

- Neath Port Talbot County Borough Council - Parking Standards (Oct 2016).
- Neath Port Talbot Highway Technical Design Guide for Residential, Commercial & Industrial Developments.
- Planning Policy Wales Technical Advice Note 18: Transport
- Schedule 3 of the Flood and Water Management Act (FWMA) 2010 requires surface water drainage for new developments to comply with Mandatory National Standards for Sustainable Drainage (SuDS). Reference to the Non-Statutory Ministerial National Standards and the CIRIA 753: The SuDS Manual is recommended.
- Welsh Government's Active Travel Guidance

In principle I have no objection to the proposal of a residential development at this location, however I have concerns over the design of the layout as listed below.

Highway Observations

1. Active Travel needs to be considered.
2. All shared drives (serving a maximum of 5 dwellings) to have a gradient not exceeding 1 in 12 to be 4.5m wide have pedestrian vision splays of 2.4m by 2.4m (behind footway) which should be hard surfaced, and a turning facility provided so all vehicles can enter and leave in a forward gear. Shared drives should not exceed 30m in length (carrying distance for bins) and there will be a need to widen the footway or provide a bin parking area where bins/sacks can be placed on collection day without obstructing the footway. It appears on the drawing provided that there are currently shared drives that exceed the maximum length of 30m. Please draw attention to plots 91-95, this is 50m greatly in excess of the 30m requirement.
3. Parking will be required at an allocation rate of one car parking space per bedroom up to a maximum of three in accordance with Parking Standards October 2016, please review as it appears some properties may not satisfy this requirement. It is difficult to read which spaces are for each property, can you please provide a numbered plan for this to be reviewed in detail.
4. Where multiple properties parking areas are away from the property, these should be cross referenced to ensure the suitable number of spaces for the property type.
5. Driveway dimensions are recommended as follows:-
 - Single drives shall be a minimum length of 6.0 metres from back of footway to front of garage structure, 3.6 metres minimum width.
 - Parallel driveways shall be 6.2m wide (3.6m plus 2.6m) with a 6m length.
 - Tandem driveways shall be 3.6m wide and 10.8m (6m plus 4.8m) in length for two spaces, the third space shall require an addition 4.8m.

In addition to the provision of pedestrian visibility splays located either side of each individual access/driveway
6. Courtyard parking car space dimensions 4.8m in length by 2.6m wide with a 6m offset reversing distance.
7. Garage dimensions to be as follows (internal dimensions):-
 - Single garage 6m in length by 3m wide
 - Double garage 6m in length by 6m wide
8. Forward visibility splays to be annotated on the plans.
9. Vehicular visibility splays at junctions to be annotated on the plans.
10. Street Lighting Design required.

11. Details of proposed gradients throughout the site are required.
12. Traverse lengths on turning heads should not exceed the requirements within our design guide, as this can encourage indiscriminate parking.
13. Pedestrian footpaths will need to be continued around all the turning head areas.
14. The footway should be a minimum of 2m this is not currently maintained throughout the site.
15. The back of footpath radii at the junctions within the site, shall be a 5.7 metres radii and a 6 metres kerb radii.
16. The location of the parking for some properties need to be reorganised to reduce the walking distance from the property to the parking space. For instance the homeowner for plots 7 & 63 would have to walk a considerable distance to reach their driveway and would likely result in them parking on the carriageway to be able to park closer to their property.
17. Pedestrian crossing points will be required to be shown on the plans provided.
18. Please provide an adoptable highway drawing to be reviewed.
19. Auto-tracking will need to be provided for the S bend in the centre of the scheme, to ensure two-way traffic can pass safely. Please also provide the CAD files to confirm the auto-tracking is correct.
20. If any alterations are required to the existing adopted highway network as a consequence of this development, it shall be subject to the Road Safety Audit process.
21. There is a length of unrestrained highway that is excess of the maximum 60m, in other areas of the site, narrowing of the carriageway has been used, please consider this for this location also.

Transport Assessment

1. All traffic count surveys should be undertaken over a 7 day period in a neutral month, only one day of survey has been provided at this time.
2. The other access point has not be surveyed to ensure that there if no issues at this point currently, Serecold Avenue onto Crymlyn Road. No consultation or Scoping for TIA survey locations have been agreed by the Council and therefore this should be undertaken prior to additional surveys taking place.
3. Please review how the development has been included within the growth factors, this should be added to the baseline prior to the growth factor.

Drainage Observations

1. SAB approval will be required prior to any work commencing. To commence work is a breach of SAB approval required under Paragraph 7 (1) Schedule 3 of the Flood and Water Management Act 2010 whereby legal action will be taken by the Authority under The Sustainable Drainage (Enforcement) (Wales) Order 2018. Guidance and applications can be found on www.npt.gov.uk/sab
2. Should any springs or ground water seepage be encountered the on site works in that area shall cease until a scheme for collection and disposal of the water has been submitted to and approved in writing by the Local Planning Authority. No ground water shall ever be discharged into the proposed drainage scheme.
3. There must be no interference, alteration or diversion of any ditch, watercourse, stream or culvert crossing or bordering the site, without prior consultation and agreement with the Authority.
4. Unless otherwise agreed in writing by the Local Planning Authority, foul water and surface water discharges shall be drained separately from the site.
5. No surface water or Land drainage run-off shall be allowed to connect, either directly or indirectly, to the public sewerage or Highway surface water system unless otherwise approved in writing by the Local Planning Authority.
6. Adequate provision shall be made for the drainage of the site, to ensure that the drainage of any adjoining land is not interrupted or otherwise adversely effected by the development during the life time of construction.

Notes to Applicant

Works on the Existing Highway

Developers' attention is drawn to the provisions of Section 278 of the Highways Act, 1980 in cases where a development would require access or other works to be carried out within the existing highway. Where highway works to benefit a development require land adjacent to an existing highway to be constructed upon together with works on the existing public maintained highway, a hybrid S38/278 shall be used. Works that are to be undertaken within the existing public maintained highway only will require a S278 agreement. No Work shall be undertaken on the existing public maintained highway until the appropriate legal agreement has been entered into.

Any works undertaken on the public highway without the appropriate legal agreement with the Highway Authority, the Highway Authority has the right to request the developer to remove and/or reinstate that part of the highway back to its original condition to the satisfaction of the Highway Authority.

A plan detailing the differences between the existing and proposed highway shall be submitted to form part of the legal agreement, this should be made up of two colours, green for the proposed area to be adopted and brown for the existing highway.

Developers are reminded that consent under the Town and Country Planning Act, 1990/91, conveys no approval for works to be undertaken affecting any part of the public highway, including verges and footways. The Developer must:-

- (i) Obtain the approval of Neath Port Talbot County Borough Council as Highway Authority for the details of any works to be undertaken in the Public Highway.
- (ii) Indemnify the Authority against all claims arising from such works, including claims under the Land Compensation Act.
- (iii) Give not less than 10 working days notice in writing of the date of commencement of the works.

As part of this process you are advised that only certain contractors are permitted to undertake the works on the public highway, a list of these contractors are available from the Highway Authority's Highway Development Control Section.

Adoption of the highway

In order to ensure the road works you are required to undertake are carried out to the satisfaction of the Local Planning Authority and subsequently adopted if you so wish you are advised prior to commencing any work on these works to contact the Head of Engineering and Transport Services at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG (FAO Mrs Delyth Thomas, telephone number (01639) 686404 or e-mail d.a.thomas@npt.gov.uk) to agree the specification, enter an adoption agreement and arrange onsite inspection of your works.

Any agreement to adopt the roads relating to this development should be entered into with the Council prior to the commencement of development. Such an agreement will be under Section 38 of the Highways Act 1980 relating to the specification, timescale and subsequent adoption of the roads and a Bond to ensure that the Authority can complete the works if the Developer defaults on the roadworks.

Active Travel

Development proposals must seek to maximise walking and cycling accessibility by prioritising the provision of appropriate on-site infrastructure and where necessary off-site infrastructure. Walking and cycling infrastructure and services should be prioritised and put in place from the outset, before people have moved in and travel patterns have been established, as per Planning Policy Wales, Edition 11 and Future Wales – The National Plan 2040. All new walking and cycling infrastructure should be built to standards set out in Welsh Government's Active Travel Guidance and off-site infrastructure should link to (where possible) routes on Neath Port Talbot Council's Active Travel Network Map. This shows where walking and cycling routes already exist (Existing Routes) and where upgrades or brand new routes are anticipated for the next 15 years (Future Routes) in built up areas. Further information on the Active Travel Guidance and Neath Port Talbot's Active Travel Network Map can be found here www.npt.gov.uk/activetravel

SAB

It is understood that the SAB pre-application service has been commenced for this development.

Please note that from 7th January 2019, all new developments of more than 1 house, or where a construction area is of 100m² or more, plus if the SAB authority believe that any redevelopment of land has significant surface water drainage implications. This will require sustainable drainage - built in accordance with mandatory standards for sustainable drainage published by Welsh Ministers - to manage on-site surface water. More information is available in [Schedule 3 of the Flood & Water Management Act 2010](#).

These systems must be approved by the Council's Highway Development Control service acting in its SuDS Approving Body (SAB) role **before construction work begins**. In this respect it is essential that a developer of any such project gain SAB approval of its surface water drainage alongside any relevant planning permission. **You will not be allowed to start construction until both permissions have been approved.**

If you have not done so already, and your development would not fall into any of the relevant exceptions, you are therefore strongly encouraged to request further advice from the SAB. Involving the SAB Officers in pre-application discussions will allow for SuDS drainage matters (to ensure suitability of proposed SuDS design in line with national standards and adequate site layout) to be considered alongside the assessment of planning merits. This can be as part of any agreed further pre-application submissions with the Planning Authority (recommended) or independently/direct with the SAB. You are advised, however, that failing to engage in joint pre-application discussions has the potential to lead to delays and, most notably, the potential need to obtain further planning permission should any agreed SuDS design not be compliant with any relevant planning permission. Further details are available at www.npt.gov.uk/sab.

Ordinary Watercourse Consent

Prior to commencement of any works within a watercourse, hereby approved permanent and temporary under Section 23 of the Land Drainage Act 1991 must be obtained from the Authority. You are therefore advised to contact the Development Management Senior Engineer, Mrs Delyth Thomas at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG (Tel.No.01639 686404 e-mail d.a.thomas@npt.gov.uk) Please note such consents can take up to 8 weeks to be processed after registration and early application is advised.

Notwithstanding the necessary consent required under section 23 of the Land Drainage Act 1991. The applicant must note that any culverts/ditches/open watercourses that conveys water through their land are to remain free from obstruction at all times. All tributary watercourses (culverted or not) located within the applicants land would be riparian responsibilities whereby the responsibility to sustain the flow of watercourse would remain with the land owner and subsequently passed on to the respective landowners thereafter should the land be sold. For further information on riparian responsibilities please contact Mrs Delyth Thomas, Senior Engineer – Team

Leader (Tel: 01639 686404 or email d.a.thomas@npt.gov.uk), alternatively you could access the riparian booklet online using the following web-link <https://www.npt.gov.uk/2867>

BT

SIGNED:  DATE: 05/12/2024
pp HEAD OF ENGINEERING & TRANSPORT

PAC Ref: N324001200

Asbri Planning Ltd
Unit 9 Oak Tree Court, Mulberry Drive, Cardiff Gate Business Park,
Cardiff
CF56 8RS



Decision : HSL-241129111933-744 ADVISE AGAINST

Your Ref: S24.149

Development Name: Crymlyn Parc

Comments:

Land Use Planning Consultation with Health and Safety Executive [Town and Country Planning (Development Management Procedure) (England) Order 2015, Town and Country Planning (Development Management Procedure) (Wales) Order 2012, or Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013]

The Health and Safety Executive (HSE) is a statutory consultee for certain developments within the Consultation Distance of Major Hazard Sites/ pipelines. This consultation, which is for such a development and also within at least one Consultation Distance, has been considered using HSE's planning advice web app, based on the details input on behalf of Asbri Planning Ltd.

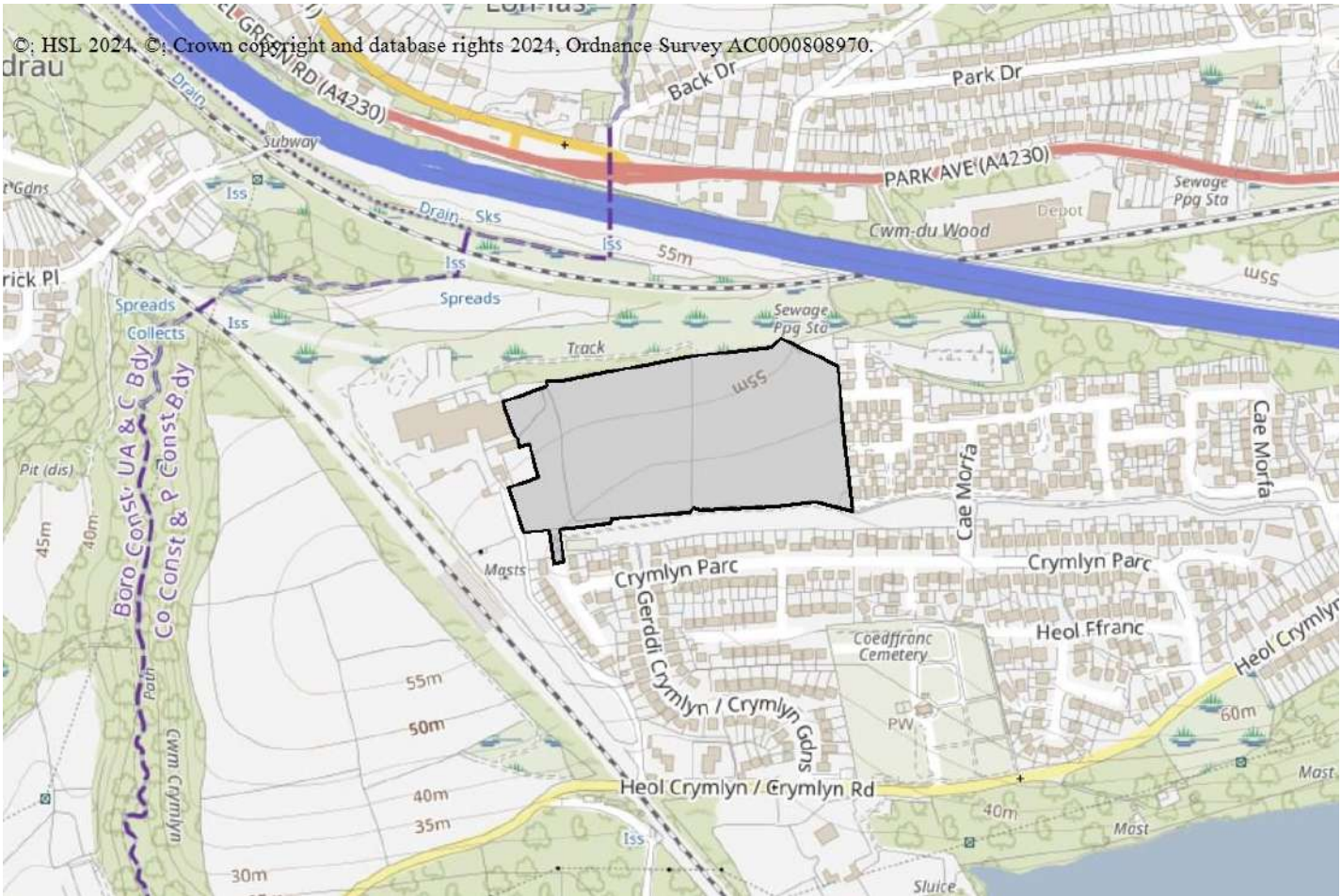
HSE's Advice: Advise Against. The assessment indicates that the risk of harm to people at the proposed development site is such that **HSE's advice is that there are sufficient reasons on safety grounds, for advising against the granting of planning permission in this case.**

Major hazard sites/pipelines are subject to the requirements of the Health and Safety at Work etc. Act 1974, which specifically includes provisions for the protection of the public. However, the possibility remains that a major accident could occur at an installation and that this could have serious consequences for people in the vicinity. Although the likelihood of a major accident occurring is small, it is felt prudent for planning purposes to consider the risks to people in the vicinity of the hazardous installation. Where hazardous substances consent has been granted (by the Hazardous Substances Authority), then the maximum quantity of hazardous substance that is permitted to be on site is used as the basis of HSE's assessment.

If you decide to refuse planning permission on the grounds of safety, HSE will provide the necessary support.

Housing : Advise Against

How many dwelling units are there (that lie partly or wholly within a consultation distance)? More than 30



If the proposed development relates to an extension to an existing facility, which will involve an increase of less than 10% in the population at the facility, then HSE may reconsider this advice; please contact HSE's Planning Advice team if this development involves such an extension.

Pipelines

- 7323_1589 Wales and West Utilities

As the proposed development is within the Consultation Distance of a major hazard pipeline you should consider contacting the pipeline operator before deciding the case. There are two particular reasons for this:

- The operator may have a legal interest (easement, wayleave etc.) in the vicinity of the pipeline. This may restrict certain developments within a certain proximity of the pipeline.
- The standards to which the pipeline is designed and operated may restrict occupied buildings or major traffic routes within a certain proximity of the pipeline. Consequently there may be a need for the operator to modify the pipeline, or its operation, if the development proceeds.

HSE's advice is based on our assessment of the pipeline as originally notified to us. It may be that in the vicinity of the proposed development the operator has modified the pipeline to reduce risks by, for example, laying thick-walled pipe. If you wish to contact the operator for this information then HSE is willing to re-assess the risks from the pipeline, relative to the proposed development, if all the following details are supplied to HSE by email (lupenquiries@hse.gov.uk):

- pipeline diameter, wall thickness and grade of steel.

- start and finish points of thick-walled sections (not required if it is confirmed that they are more than 750m from all parts of the development site).

Please note there may be an additional charge for this work.

This advice report has been generated using information supplied by Kate Stevens at Asbri Planning Ltd on 04 December 2024.

Note that any changes in the information concerning this development would require it to be re-submitted.

You may wish to contact HSE's Planning Advice team to discuss the above enquiry result by email at lupenquiries@hse.gov.uk. Depending on the nature of the further discussions you may be advised that there is a charge for consultancy work done on your behalf by the team.

Asbri Planning Ltd
Suite D
1st Floor 220 High Street
Swansea
SA1 1NW

Ein cyf/Our ref: CAS-268151-Z2C6
Eich cyf/Your ref: S24.149

Dyddiad/Date: 06 December 2024

Annwyl Syr/Madam/Dear Sir/Madam,

**STATUTORY PRE-APPLICATION CONSULTATION – TOWN AND COUNTRY
PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012
AS AMENDED**

**BWRIAD/PROPOSAL: THE DEVELOPMENT OF UP TO 153 NO. HOMES; WITH ALL
MATTERS RESERVED**

LLEOLIAD/LOCATION: LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH.

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 08 November 2024.

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding protected sites and waste. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

We also advise that based on the information submitted to date, we would ask the planning authority to include conditions regarding pollution prevention and land contamination on any planning permission granted Without the inclusion of these conditions by the planning authority we would be likely to object to the planning application.

Protected Sites

We note the sites proximity to the Crymlyn Bog Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC).

We have reviewed the submitted preliminary ecological appraisal (PEA) by Hawkeswood Ecology, (Ref: HE/40/2020, September 2024) which states in paragraph 4.12 that there are no impact pathways to Crymlyn Bog SAC, however no information has been submitted in regards to impacts on the site through both hydrological and air quality pathways.

The storm/surface drainage system feeds into the Crymlyn Brook catchment, which in turn feeds the hydrological system of the bog. The Calcareous Fen, and Transition Mires and Quaking Bog features are both currently in poor condition due to over-wetting of the system, therefore any potential additional hydrological inputs to the bog need to be carefully considered. The risk of pollutants either as a result of construction or storm sewage overflow entering the watercourse as well as the SAC also needs to be considered.

We note the submitted Air Quality Assessment however this does not include impacts on nearby environmental receptors. Given the close proximity of the proposed development to Crymlyn Bog SAC, we would require an air quality report and modelling which rules out any impact upon the sensitive habitats present on site.

Therefore we have concerns that harm from the proposed development on the SAC and SSSI cannot be ruled out.

Habitat Regulations Assessment

Under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for the local Authority to carry out the test of Likely Significant Effects for the proposed development. Should they conclude that the proposal is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, an appropriate assessment must be made of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as they specify.

Contaminated Land

We have reviewed the supporting documents including the following:

- Geotechnical and Geoenvironmental Report (GGR): Proposed Residential Development, Phase 5 Crymlyn Road, Skewen. May 2021. Referenced: 110521-16595-01. Prepared by Terra Firma Wales.

From the report we note that groundwater was not encountered during the drilling works. However, there is no information as to whether groundwater was encountered after drilling by measuring groundwater levels within the installed wells after drilling was completed. This would have provided a truer picture of baseline groundwater conditions.

Concentrations of arsenic have been recorded above the generic threshold value in 9 of the 19 soil samples tested. All are from the brown organic-rich slightly gravelly clay which covers the site.

The GGR recommends that a more detailed analysis of the soils at the site takes place to calculate a site-specific assessment criterion for arsenic. Alternatively, to protect future site users from the identified contamination, either the site will need to be capped or the affected soils removed from site and disposed of at a suitably licenced landfill site.

Additionally, we note from the GGR that only 3 of the 17 soil samples were analysed for Total Petroleum Hydrocarbon (TPH) which is a small percentage of the number of soil

samples collected. TPH is typically analysed for when oil contamination is presented or suspected to be present.

Considering this shortfall in sampling and chemical characterisation, further site characterisation and sampling is required (soils and groundwater). We are satisfied that this aspect can be controlled by the following conditions:

Condition 1

No development or phase of development at the Land North of Crymlyn Parc suspected of contamination, shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification:

To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

Condition 2

Prior to the occupation or operation of the development, a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification:

To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated

prior to occupation or operation, to prevent both future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Condition 3

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification:

To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

In addition, for a development of this scale you will need to obtain the approval of the SuDS Approving Body (SAB) for the management of surface water on site.

We advise that infiltration of surface water drainage into the ground should only be permitted for parts of the site where it has been demonstrated there is no resultant unacceptable risk to controlled waters. This should be informed by ground investigations and/or a remediation strategy. If this is not properly controlled, the development may create pathways for pollution to controlled waters.

Waste

A previously permitted landfill is located close to the northern boundary of the development site. The licence for the deposit of inert and industrial waste was in operation from 1993 to 2002 and surrendered in 2005. The landfill was classified as an inert site and therefore significant volumes of gas and leachate are unlikely to be produced. However, we advise that you consult with the Local Authority's Environmental Health and Building Control departments to ensure that any risk from landfill gas can be acceptably managed.

Pollution Prevention

Due to the potential for pollution during construction, we request that a Construction Environmental Management Plan (CEMP) is submitted for the development. We would be satisfied with the following condition being attached to any planning permission granted.

Condition 4

No development or phase of development, including site clearance, shall commence until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed;
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of

spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.

- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures; measures to control light spill and the conservation of dark skies.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Justification: A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction.

We would request that the procedures and methodologies to be followed in respect of preventing pollution, namely GPP's 1,5,6 and as a precaution GPP 21 and 22. A link to the various documents can be found here: [Guidance for Pollution Prevention \(GPP\) documents | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland](#)

Please note that additionally, an Ordinary Water Course consent would need to be approved by the lead local flood authority (Neath Port Talbot County Council) for the construction of the Headwall.

Foul Drainage

We note that the drainage plans show connection to the mains sewer for the disposal of foul waters. We recommend you contact Dwr Cymru Welsh Water to confirm that there is sufficient capacity to accommodate the proposed development.

Protected Species

NRW is not in a position to comment on this application at this time as it relates to protected species. We'd advise that you consult the Local Authority's Ecologist on the proposal to ensure that biodiversity matters are appropriately considered.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Kirsty Murphy

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: swplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Ffion Goodland

From: Mustafa, Dana <Dana.Mustafa@wsp.com>
Sent: 22 November 2024 16:17
To: Mail Asbriplanning
Cc: LGC_Development_Control-South@gov.wales
Subject: Pre - Planning - Land north of Crymlyn Parc, Skewen, Neath

Good afternoon,

Pre - Planning - Land north of Crymlyn Parc, Skewen, Neath
Development of up to 153 no. homes; with all matters reserved.

I refer to your preplanning consultation of 08/11/24 regarding the above application and advise that the Welsh Government as highway authority for the M4 motorway directs that planning permission is not granted at this time as the applicant has provided insufficient information to determine the application.

The applicant must provide the following information to support this application or resubmit the application with the following details;

- 1) A revised Transport Assessment (TA) to include detailed traffic modelling of the M4 junction 43 to check capacity. The assessment should be undertaken to include any high seasonal variations (if appropriate) and AM / PM peak hour flows on the trunk road network. Committed housing development in the immediate vicinity at Coed Darcy, should be included. If the junction capacity for the worst case scenario is observed to be operating above the theoretical Ratio of Flow Capacity (RFC) value of 0.85, the applicant would be required to supply proposals to alleviate capacity concerns mitigating the developments impact. Alternatively, reasoning for its acceptability should be supplied for our full consideration.

If you have any further queries, please forward to the following Welsh Government
Mailbox Lgc_development_control-south@gov.wales.

Kind regards,

Dana

Dana Mustafa BEng (Hons) MSc
Assistant Engineer – Roads North West



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-LAEmHhHzdJzBITWfa4Hgs7pbKl Checked for spam and viruses
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Appendix H - Responses received from 'other' consultees



Heddlu De Cymru
Pencadlys Heddlu
Heol y Bont-faen
Penybont
CF31 3SU

South Wales Police
Police Headquarters
Cowbridge Road
Bridgend
CF31 3SU

Cadw De Cymru Yn Ddiogel

Keeping South Wales Safe

Neath Police Station
Gnoll Park Road
Neath
SA11 3BW

Email michael.harvey2@south-wales.police.uk
Telephone 07815 953028

21st November 2024

Asbri Planning

Dear Sir/ Madam

Re: LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH.

Having reviewed the drawings, I would make the following observations with a view to the development achieving the Secured by Design (SBD) Gold Award :-

(i). Site layout.

I am generally pleased with the site layout. All the vehicle parking bays are within curtilage/overlooked.

The only concerns I have is in respect of the footpaths adjacent to plots 53 – 76 and 140-144. These paths must be afforded as much natural surveillance as possible by adjacent properties and properties overlooking i.e. plots 90-95 by having appropriately placed windows in the homes. Views of the footpaths from the plots must not be blocked by trees.

Windows and perimeters adjacent to the paths must be protected by defensible planting i.e. thorny bushes/plants.

Pedestrian routes must be designed to ensure that they are visually open, direct, overlooked, lit and well used. Routes must not ideally be segregated from one another or provide access to side/rear gardens. Paths ideally should be 3 metres wide.

Prif Gwnstabl | Chief Constable Jeremy Vaughan

www.south-wales.police.uk

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg. Byddwn yn ymateb yn eich iaith o ddewis.
We welcome correspondence in Welsh and English. We will respond in your language of choice.



HEDDLU
DE CYMRU
SOUTH WALES
POLICE



Entry onto the estate must be restricted to the designated main routes.

Reason – To prevent autocrime.

(ii). Lighting.

Lighting on the estate must meet the British Standard 5489.

Reason – To increase public safety and remove the cover of darkness for criminals.

(iii). Boundary identification.

Defensible space using symbolic barriers e.g., pillars, rumble strip, or a change of road surface, i.e., colour or texture, must be built into the design especially at the entrances to the development.

There must be e.g. a change of surface, i.e., colour or texture, to identify public areas from private or semi-private areas e.g., the footpaths from the driveways/front gardens.

Preferably front boundaries would be identified by low walls and gates.

Reason -To encourage a feeling of territoriality amongst users and to deter criminals.

(iv). Landscaping and planting.

Overgrown shrubs and other thick barriers that are near public areas must be avoided and clear sightlines must be maintained over long distances. Windows and doors must not be obscured by landscaping features and trees in public areas must not have any foliage below 2 metres from the ground.

Trees and other landscaping features must not be positioned where they could create hiding/entrapment spaces, obscure signage and lighting or provide a potential climbing aid into properties.

There must be clear lines of sight across the development and clear unobstructed views of the parking bays and the footpaths mentioned under point (i), from the



properties.

Reason - To increase surveillance, reduce the opportunity for crime and to prevent hiding places being created for criminals to operate.

(v). Vehicle parking.

Vehicle parking, especially parking at the side of properties and the parking for the apartment blocks, must be overlooked preferably by rooms in the properties ideally, that are usually occupied e.g., living rooms, kitchens.

During the hours of darkness, the bays must be well illuminated, and they must enjoy good natural surveillance from the properties with unobstructed views.

Reason – To provide safe vehicle parking areas that are used and to prevent auto-crime.

(vi). LAP.

These areas must be located where they are afforded good natural surveillance from properties (as per drawing) to provide protection for the young children using the areas. Also, this would reduce the risk for the areas being targeted for anti-social behaviour when not in use.

Ideally the areas would be lit and protected by railings/fencing to prevent vehicular entry, and they should be locked out of hours.

Any planting must be of the low-level type, i.e. plants or bushes must only grow to a maximum height of 1 metre and trees should have no branches below 2 metres from the ground to afford maximum surveillance of the spaces.

Reason – To provide safe areas for children to play and to prevent anti-social behaviour.

(vii). Side and rear boundaries.

The walls/fencing and gates preventing access to the rear and sides of the properties must be robust, at least 1.8 metres high (2 metres high if the side or rear



gardens are adjacent to open land). To prevent it being climbed the perimeter security must be of a suitable design.

Boundaries adjacent to paths must be protected by defensible planting.

Gates must be lockable both sides with a key, the same height as the adjacent wall/fencing and sited at, or as near to, the front building line of the properties as possible.

Rear and side gardens must be secure areas.

Reason – To prevent access for criminals to areas where they cannot be seen and to prevent burglary.

(viii). Garden sheds.

Garden sheds should be sited away from the rear fencing or walls.

Reason - To prevent assisting people in climbing over the perimeter security.

(ix). Bin stores.

Bins must be kept in secure areas e.g., the rear gardens. The communal bin stores for the apartments must be secure and access into communal bin stores must be controlled by access control e.g. digilocks.

Reason – To prevent arson and assisting criminals to climb over the perimeter security.

(x). Bicycle stores.

Bike stores must be secure, lit and overlooked by the properties (please visit www.securedbydesign.com for more information.

Access into communal bike stores must be controlled by access control e.g. fob, swipe card etc.

Reason – To prevent bike theft.





(xi). Security lighting.

Security lighting must be installed controlled preferably by photo electric cells or time switches or alternatively PIR detectors. The lighting should protect the rears and sides of the homes/apartments, the parking bays, bike and bin stores and the driveways.

Callers at the external doors of the properties must be lit during the hours of darkness.

Reason – To increase public safety, reduce crime and to allow callers at the doors to be identified.

(xii). Drainpipes.

If the drainpipes of the properties are not within the fabric of the buildings, they must be designed or protected so that they do not offer an assist to climbing.

Reason – To prevent access to windows above ground floor level or to roofs.

(xiii). Blank walls.

Windowless elevations or blank walls adjacent to space to which the public have access, should be avoided, and provide at least one window to a habitable room wherever possible. Where blank flanking walls are unavoidable, a 1 metre 'buffer zone' must be created.

Reason – To increase surveillance and to prevent anti-social behaviour.

(xiv). Public utilities.

If smart meters are not installed, meter boxes must be fixed to, or as near to, the front building lines of the properties as possible.

Reason – Not to give an excuse for criminals to access the rear of properties.

(xv). Access control.

Access into the apartment block must be controlled by access control with audio and



visual verification fitted that meets Secured by Design standards and specifications.

Reason -To prevent opportunist crime and burglary.

(xvi). Door security.

The entrance doors into the apartment block must meet the standard PAS 24 2022, LPS 1175 SR2 or equivalent and should be third party tested and certificated by a UKAS accredited test house.

Door entry and access control must be tested on the same certificate. Doors that are described as fire doors, or where fire performance is declared or implied, are required to have third-party certification for security, smoke, and fire performance. Fire doors must have no external furniture fitted.

It is vitally important that developments have the correct level of security specifications for door-sets and windows and that the selected doors for any development have been tested against the requirements of BS 6375, parts 1-3 and are classified according to their intended use. This is particularly important when deciding on the relevant door-set for an apartment block, as the usage will be much higher. Therefore, the door-set must be fit for its intended purpose and environment as in the Secured by Design New Homes Guide 2024

Glass fitted in or adjacent to door panels must be laminated and doors in recesses of more than 600 mm deep must be avoided.

The doors in the houses and individual apartment doors must meet the standard PAS 24 2022 or equivalent and again be third party tested and certificated by a UKAS accredited test house.

Glass fitted in or adjacent to door panels must be laminated and doors in recesses of more than 600 mm deep must be avoided.

Reason – To prevent burglary.

(xvii). Window security.

All vulnerable windows fitted, e.g., ground floor windows, windows above flat roofs, must meet the standard PAS 24 2022 or equivalent and must be third party tested



and certificated by a UKAS accredited test house. They should also have key operated window locks fitted.

Reason – To prevent burglary.

(xviii). Intruder alarm system.

A 13-amp fused spur should be installed in each individual property. Ideally all properties would have an intruder alarm fitted up to the relevant British Standard.

Reason To deter and detect criminals.

(xix). Identification of properties.

Property numbers and street names must be clearly displayed.

Reason – To assist postal workers, emergency services etc. to find properties.

Further detailed information can be found by visiting the Secured by Design website www.securedbydesign.com.

If you or the developer wish discussing any of the points raised in this report please do not hesitate to contact me.

Yours Sincerely

Mike Harvey
Designing out Crime Officer

Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

South Wales Police welcome's receiving correspondence in Welsh and English. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Ffion Goodland

From: Rob Dunning <Rob.Dunning@heneb.org.uk>
Sent: 11 November 2024 14:19
To: Mail Asbriplanning
Subject: RE: LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Dear Kelly,

Many thanks for the pre-planning enquiry. We have consulted the regional Historic Environment Record (HER) and note there are no known archaeological sites within the development area. Previous archaeological work in the vicinity, including an appraisal, evaluation and watching brief, has recorded the remains of Cefnyresgyrn farmstead and a Post-medieval trackway of relatively low importance. Furthermore, there is no indication of such remains being present within the current development. Indeed a review of historic Ordnance Survey mapping depicts no archaeological structures or features.

Overall, it is unlikely that significant archaeological material will be encountered during the works. As a result, should a similar application to the one you have outlined be submitted, we would be unlikely to recommend any pre-determination works or that any archaeological conditions be attached to any consent. This is consistent with our previous responses to a pre-planning enquiry and the LDP (our ref. NPT0523 and NPT0623).

Should you require anything further, please get in touch.

Regards,

Rob

Rob Dunning BSc MCIfA
Stewardship Officer



Heneb Ymddiriedolaeth Archaeolegol Cymru Rhanbarth Morgannwg Gwent
Heneb The Trust for Welsh Archaeology, Glamorgan Gwent Region

gynt Ymddiriedolaeth Archaeolegol Morgannwg Gwent Cyf, Formerly Glamorgan Gwent Archaeological Trust Ltd.

SA12 Business Centre, Seaway Parade Industrial Estate, Baglan, Port Talbot, SA12 7BR

Ymholiadau Cyffredinol | Tel: 01792 655208
Ebost | Email: GGAT-planning@heneb.org.uk
Gwefan | Website: www.ggat.org.uk/cms

Cwmni cyfyngedig (No.1198990) ynghyd ag elusen gofrestredig (No.504616) yw'r Ymddiriedolaeth.

Swyddfa Cofrestredig: Ty Cornel, 6 Stryd Caerfyrddin, Llandeilo, Carmarthenshire, SA19 6AE

Dylai'r datganiadau neu'r sylwadau uchod gael eu trin fel rhai personol ac nid o reidrwydd fel datganiadau neu sylwadau gan Ymddiriedolaeth Archaeolegol Cymru.

Mae'r e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac at ddefnydd yr unigolyn neu'r corff y cyfeiriwyd hwy atynt yn unig. Os ydych wedi derbyn yr e-bost hwn drwy gamgymeriad, dylech hysbysu'r gweinyddydd yn y cyfeiriad canlynol: enquiries@ggat.org.uk

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From: Mail Asbriplanning <mail@asbriplanning.co.uk>
Sent: 08 November 2024 14:45

Subject: SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C, 2D & 2G- LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Dear Sir/madam

Please see attached Consultation for your attention

Kind regards

Kelly Davies
Business Support Manager
Asbri Planning Ltd | T: 02920 732652 | W: <http://www.asbriplanning.co.uk>



Cardiff | Swansea



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Ffion Goodland

From: Mail Asbriplanning
Sent: 15 November 2024 10:40
To: Ffion Goodland; Iwan Rowlands
Subject: FW: 8150125902
Attachments: 8150125902-Exchange of Information.pdf; 8150125902 plan.pdf

From: Izaak Follon <Izaak.Follon@wwutilities.co.uk> **On Behalf Of** Dig (Shared Mailbox)
Sent: 15 November 2024 09:51
To: Mail Asbriplanning <mail@asbriplanning.co.uk>
Subject: 8150125902

Good Morning,

Reference: 8150125902

Please find enclosed a copy of the requested plan and our general conditions, for your reference.

Our records show those pipes owned by Wales & West Utilities (WWU) in its role as a Licensed Gas Transporter (GT). Service pipes, valves, syphons, stub connections, etc. may not be shown but their presence should be anticipated. No warranties are therefore given in respect of it. They also provide indications of gas pipes owned by other GTs, or otherwise privately owned, which may be present in this area. This information is not information of WWU and WWU is unable to verify this information or to confirm whether it is accurate or complete.

The plan must be printed in A3 size and will also need to be produced in colour. If this is not possible, we can send you a hard copy if requested. Let me know if you require any further assistance.

Regards



Izaak Follon | Plant Protection

Tel: 07967844387

Wales & West House | Spooner Close | Celtic Springs

| Newport | NP10 8FZ

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From: Taylor Davies <Taylor.Davies@wwutilities.co.uk>
Sent: 11 November 2024 13:15
To: Dig (Shared Mailbox) <Dig2@wwutilities.co.uk>
Subject: FW: SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C, 2D & 2G- LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

Many thanks,



Taylor Davies | Network Support Assistant
Connections
Mob: 07977 591 944
Wales & West House | Spooner Close | Celtic Springs
| Newport | NP10 8FZ

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From: Chris Dowden <Chris.Dowden@wwutilities.co.uk> **On Behalf Of** Connections
Sent: 08 November 2024 15:18
To: Frontdesk Requests <frontdeskrequests@wwutilities.co.uk>
Subject: FW: SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C, 2D & 2G- LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

From: Mail Asbriplanning <mail@asbriplanning.co.uk>
Sent: 08 November 2024 14:45
Subject: SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C, 2D & 2G- LAND NORTH OF CRYMLYN PARC, SKEWEN, NEATH

[Caution: This email has been sent from outside Wales & West Utilities]

Dear Sir/madam

Please see attached Consultation for your attention

Kind regards

Kelly Davies
Business Support Manager
Asbri Planning Ltd | T: 02920 732652 | W: <http://www.asbriplanning.co.uk>



Cardiff | Swansea



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<http://www.canit.akauk.net/>

Our Reference Number : 8150125902

Your Reference Number :



Wales & West House
Spooner Close
Celtic Springs
Coedkernew
Newport NP10 8FZ

www.wwutilities.co.uk

FAO:

Date :
Network Contact :
Telephone :
Fax :

Dear

Re: Exchange of Information

Wales & West Utilities acknowledge receipt of your notice received on , advising us of your intention to carry out work at:

We enclose an extract from our mains records of the area covered by your proposals together with a comprehensive list of General Conditions for your guidance. This plan shows only those pipes owned by Wales & West Utilities in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GT's and also privately owned may be present in this area. Information with regard to such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty and the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Wales & West Utilities, its agents or servants for any error or omission.

YOU WILL NOTE THE PRESENCE OF OUR INTERMEDIATE / HIGH PRESSURE GAS MAIN(S) IN PROXIMITY TO YOUR SITE. NO EXCAVATIONS ARE TO TAKE PLACE ABOVE OR WITHIN 10m OF THE CONFIRMED POSITION OF THESE MAINS WITHOUT PRIOR CONSULTATION WITH WALES & WEST UTILITIES

The Wales & West Utilities Intermediate / High Pressure Network may be affected by your proposals and a copy of the information you have provided has been forwarded to Asset Management for their comment. They will then contact you as necessary. Please note, 7 days notice is required if you require a site visit from an Engineer.

Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus.

If you have requested a new connection or diversion of our apparatus, information will be sent under a separate letter.

If you have any queries please contact on who will be happy to assist you.

Any information you provide as part of this application process for our services will only be used in accordance with our privacy notice statement which can be found on our website www.wwutilities.co.uk. Alternatively a paper copy can be provided to you on your request by contacting our Data protection Officer at DataProtection@wwutilities.co.uk

24 hour gas escape number
Rhif 24 awr os bydd nwy yn gollwng

0800 111 999*

*calls will be recorded and may be monitored
caiff galwadau eu recordio a gellir eu monitro



BSL210

Wales & West Utilities Limited

Registered Office:
Wales & West House, Spooner Close, Coedkernew, Newport NP10 8FZ
Registered in England and Wales: No. 5046791

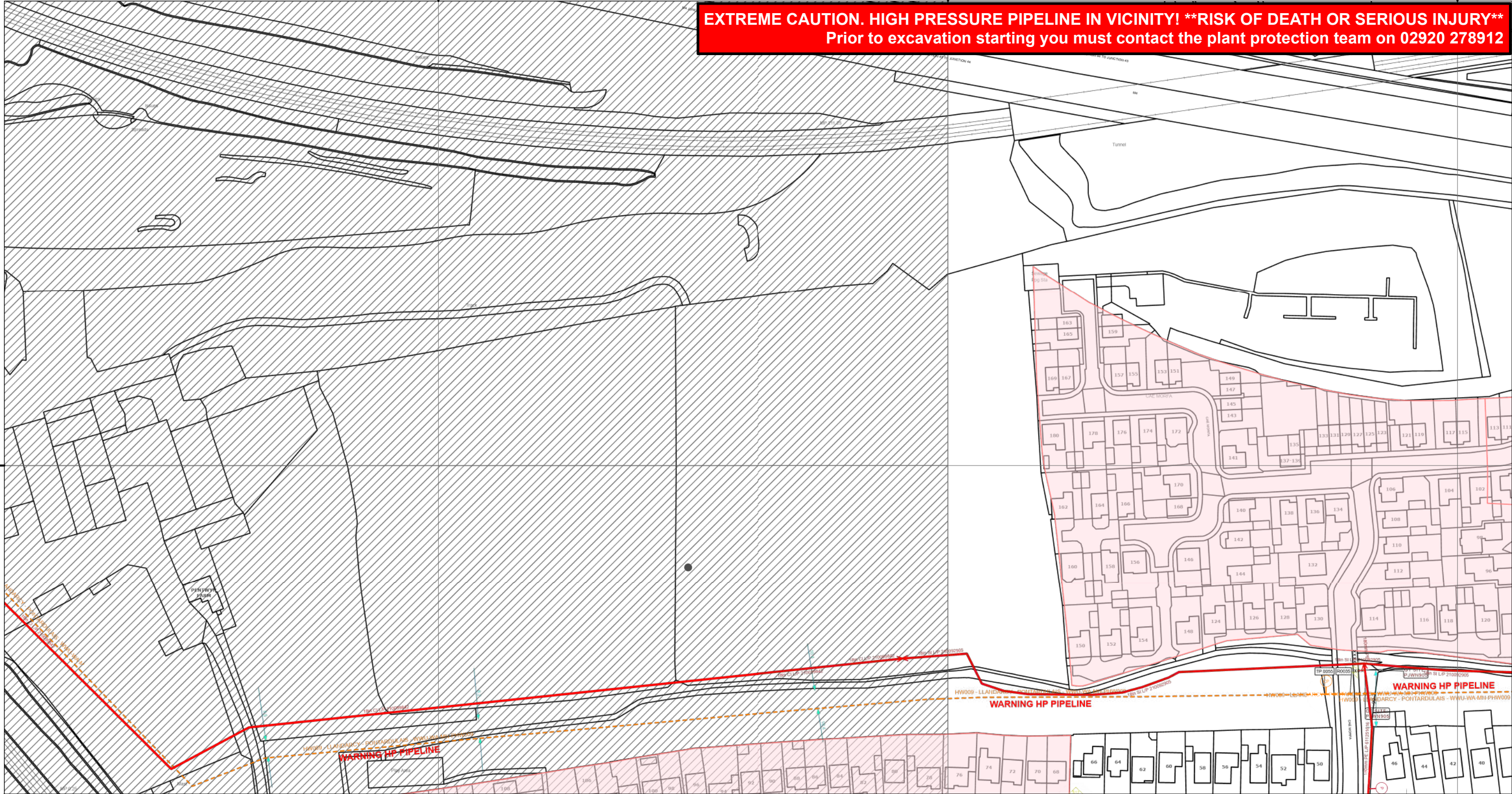
270800

271000

271200

EXTREME CAUTION. HIGH PRESSURE PIPELINE IN VICINITY! **RISK OF DEATH OR SERIOUS INJURY**
Prior to excavation starting you must contact the plant protection team on 02920 278912

197000



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IMPORTANT NOTICES

- This information is given as a guide only and its accuracy cannot be guaranteed
- The plan only shows those pipes owned by Wales & West Utilities (WWU) as its role as a licensed Gas Transporter
- Service pipes, valves, syphons, stub connections etc. may not be shown but their presence should be anticipated
- You must use safe digging practices in accordance with HS(G)47 to establish the actual position of mains, services and other apparatus before any mechanical excavation is used
- It is your responsibility to ensure this information is provided to all persons working near our plant
- If in doubt call the WWU dig team on 02920 278912

- Low Pressure (LP) 21mbar – 75mbar
- - - Medium Pressure (MP) 350mbar – 2bar
- - - Intermediate Pressure (IP) 2bar – 7bar
- - - High Pressure (HP) >7bar
- ⌵ Line/Fire Valve
- ⌵ Governor Station
- ⌵ Change of Diameter
- ⌵ End Cap
- ⌵ Depth of cover

In case of an emergency call 0800 111 999

Title: 8150125902

Date Requested: 15/11/2024
Job Reference:
Site Location: Easting: 270925E Northing: 197027N
Requested by:
Your Scheme/Reference: Connections_A3_Landscape
Exact Scales: 1:1,500 @A3

Warning: PDF designed for colour print only with no page scaling

Dial
before
you dig

We need
10 days'
notice

Smell gas?
Call the Gas Emergency Service on 0800 111 999.

Dial
Call 029 2027 8912 before you start work.

Investigate
Before you dig, make sure you know what's below.

Go ahead
Done your research? Now you can dig safely.