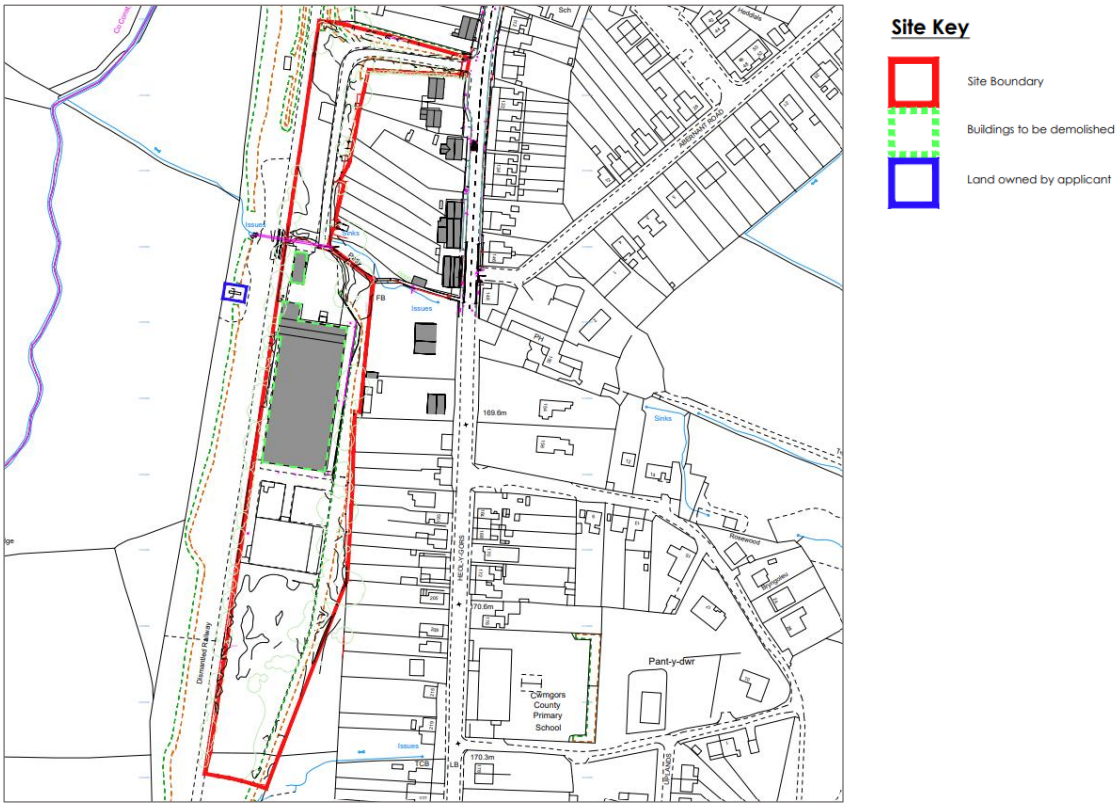
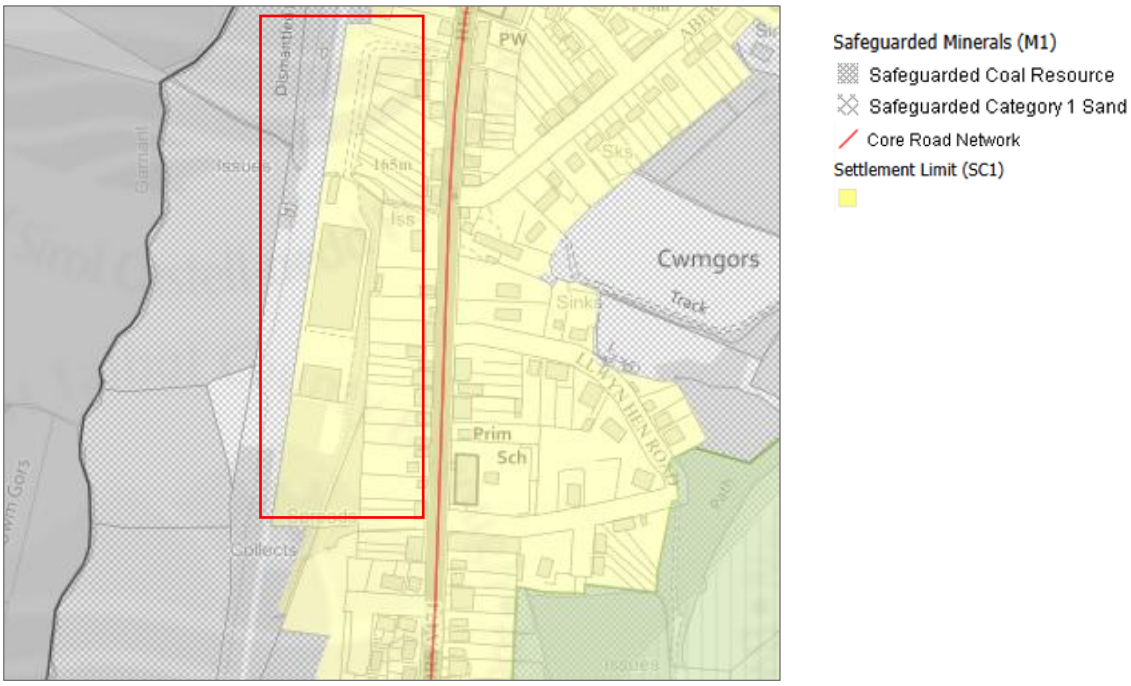
Planning Statement

Land West of Heol Heol-Y-Gors,
Cwmgors

April 2025

amity
planning consultants

Introduction	
Client	This statement has been prepared on behalf of Bluefield Land.
Scope	This statement accompanies the full planning application for proposed demolition and re-development of former Swelco Factory into affordable dwellings with appropriate green infrastructure, drainage, parking, and associated works.
Site Details	
Site Address	Former Swelco Factory, Heol y Gors, Cwmgors, Neath, SA18 1RF.
Site Location	***Fig.1 Location Plan*** 
Site Description	The site is 100% brownfield land and consists of the former redundant Swelco Factory building and associated grounds, located in Cwmgors, adjacent to Heol Y Gors. The former Swelco Factory has been out of use for over 20 years, and as such, has fallen into a state of disrepair. The total area of the site is 1.77 hectares, and the land predominantly slopes gently northeast to southwest. The site is delineated by a dismantled railway line and undeveloped land to the west, with continued former railway and residential development to the north. Further residential development is located at Heol-Y-Gors. The surrounding homes reflect architectural styles from 1940-2000's, ranging from one to two storeys. The wider settlement is enclosed by field parcels of varying sizes.

	The site has been colonised by unmanaged grassland with scattered scrub and some Japanese knotweed. Broadleaved woodland, sections of hedgerow and a line of trees are present on the boundaries. A small watercourse runs through the centre of the site which links through to the Afon Garnant. Vehicular access to the site is currently available through an existing entrance located to the northeast, off Heol-Y-Gors. Pedestrian access is also available via the existing footpath next to 175 Heol y Gors (Public Right of Way) which traverses the site. The site is highly accessible, with a variety of amenities including shopping and leisure facilities within walking distance. Additionally, bus stops conveniently situated along Heol-Y-Gors provide easy access to the wider area.
Relevant Planning Policy	
Approach	In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the area comprises of the Neath Port Talbot Local Development Plan 2011-2026 (adopted January 2016) together with Future Wales – The National Plan 2040. Relevant material considerations in this instance are identified as including Planning Policy Wales, various Technical Advice Notes, and adopted Supplementary Planning Guidance.
Local Development Plan	The Neath Port Talbot Local Development Plan (2011-2026) is the adopted development plan for the proposed site location and provides the statutory framework for the development and use of land within Cwmgors. ***Fig.2 Adopted LDP Proposals Map and the Application Site*** 

The site is subject to the following designations within the adopted Local Development Plan:

- Within the defined Development Limits of Cwmgors (Policy SC1)
- Categorised as a "Small Local Centre" within the Settlement Hierarchy (Policy SP3 - 3.0.11)
- Adjacent to a Coal Mining Safeguarded Area (Policy M1)
- Directly linked to the Primary Core Road Network (Policy TR1)

The following policies have been identified as relevant to the development proposals:

Policy SC1 -Settlement Limits
Policy SC1 advises that development within settlement limits, that is proportionate and of scale and form to the role and function of the Settlement Hierarchy will be acceptable in principle.

Policy SP3 - Sustainable Communities
Policy SP3 seeks to deliver sustainable, healthy and cohesive communities and conserve the countryside by;

1. Defining sustainable communities and locations for development by the identification of a settlement hierarchy that reflects the role and function of settlements.
2. Defining settlement limits within which development which accords with the settlement hierarchy will be permitted in principle.

Policy SP7 - Housing Requirement
In order to deliver the 7,800 new dwellings required to meet the economic-led growth strategy, provision will be made for the development of 8,760 additional dwellings between 2011-2026 including a 12.31% flexibility allowance.

Policy SP8 – Affordable Housing Requirement
Policy SP8 outlines that provision will be made to deliver 1,200 affordable housing units within Neath Port Talbot over the Plan period (2011-2026) through the following measures:

1. Setting thresholds and targets requiring housing developments to contribute to affordable housing provision; and
2. Providing a framework for determining affordable housing exception sites

Policy AH 1 – Affordable Housing
All new housing developments, including conversions, on sites accommodating 3 or more units will be required to contribute to affordable housing provision. As the site is within the Valley area, a contribution would not be sought.

Policy SP15 Biodiversity & Geodiversity
Important habitats, species and sites of geological interest will be protected, conserved, enhanced and managed.

Policy SP16 – Environmental Protection
Air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures:

1. Ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels;

2. Giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable;
3. Ensuring that developments do not increase the number of people exposed to significant levels of pollution.

Policy SP17 – Minerals
Policy SP17 regulates the exploitation of mineral resources. A proportionate contribution to meeting national, regional, and local demand for a continuous supply of minerals will be made while balancing the impact of development on the environment and communities. This will be achieved by:

1. Maintaining a minimum supply of aggregate throughout the Plan period.
2. Safeguarding identified resources of coal, hard rock and sand and gravel;
3. Promoting the efficient use of aggregates and encouraging the maximum use of alternative materials before the use of raw aggregate.
4. Ensuring that mineral development will not have an unacceptable impact on the environment and amenity of local residents.
5. Minimising the conflict between sensitive land uses and mineral operations by identifying buffer zones around mineral sites and protection zones around settlements

Policy M1 – Development in Mineral Safeguarded Areas
Development proposals within mineral safeguarding areas will only be permitted where it can be demonstrated that:

1. The mineral concerned is no longer of any value or potential value; or
2. The mineral can be extracted satisfactorily prior to the development taking place; or
3. In the case of temporary development, it can be implemented, and the site restored within the timescale that the mineral is likely to be needed; or
4. There is an overriding need for the development; or
5. The scale and location of the development would have no significant impact on the possible working of the resource.

Policy SP20 – Transport Network
Policy SP20 provides guidance on how the transport system and infrastructure is to be developed in a safe, efficient, and sustainable manner through the following measures:

1. Implementing key transport projects and supporting schemes identified in the Joint Transport Plan; 2. Promoting connectivity and access to public transport through improving bus and rail facilities;
2. Supporting enhancements to the walking and cycling network;
3. Promoting park and share schemes along key highway routes;
4. Promoting efficient use and links to the transport network through the identification of a road hierarchy;
5. Restricting development which would have an unacceptable impact on highway safety;
6. Requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport;
7. Requiring appropriate parking provision;
8. Facilitating movement of freight by means other than road.

Policy SP21 – Built Environment and Heritage
The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:

1. Encouraging high quality design standards in all development proposals;
2. Protecting arterial gateways from intrusive and inappropriate development;
3. Safeguarding features of historic and cultural importance;
4. The identification of the following designated sites to enable their protection and where appropriate enhancement: (a) Landscapes of Historic Interest; (b) Historic Parks and Gardens; (c) Conservation Areas; (d) Scheduled Ancient Monuments; and (e) Listed Buildings and their curtilage.

SP22 – Welsh Language
The Welsh language will be safeguarded and promoted in the following language sensitive areas:

1. Amman Valley.
2. Swansea Valley.
3. Pontardawe.
4. The community of Crynant in the Dulais Valley.

SP10 - Open Space
Provision will be made to ensure that all residents have access to adequate open space through the following measures:

i. Ensuring that new development addresses local needs;
ii. Retaining and protecting existing open space.

OS1 - Open Space Provision
Where there is a quantitative deficiency in outdoor sport, children's play, informal space or allotments, provision will be sought, including the requirement for maintenance, in conjunction with all new residential developments of 3 or more dwellings, based on the following standards:

- Open Space Standard Outdoor Sport 1.6 hectares per 1,000 population
- Children's Play 0.25 hectares per 1,000 population
- Informal Space 0.55 hectares per 1,000 population
- Allotments 0.19 hectares per 1,000 population

In the case of employment or commercial development proposals of over 1,000 sqm, provision will be sought for associated amenity space.

EC2 - Existing Employment Areas
In order to protect the employment function of the County Borough's employment areas, uses on the following sites will be restricted in accordance with Policy EC3:

- Reference Site EC2/14 - Cwmgors Workshops and Industrial Estate, Amman Valley

EC3 - Employment Area Uses
Within allocated and existing employment areas, unless otherwise specified and where appropriate, uses will be restricted as follows:

i. Uses within classes B1, B2 and B8;
ii. Ancillary facilities or services which support and complement the wider role and function of the primary employment use;
iii. Commercial services unrelated to class B.

Developments will be required to demonstrate that proposals do not cause any adverse impacts on the overall function of the employment area and neighbouring commercial and residential properties, the proposal can be sustainably justified in this location and is appropriate in scale and form to the role and function of the employment area.

EC4 - Protection of Existing Employment Uses
Proposals which would result in the loss of existing land or buildings in employment use as defined in Policy EC3 and/or within the existing employment areas identified in Policy EC2, will only be permitted where the following criteria are satisfied:

i. It is demonstrated that employment uses are no longer viable or appropriate in this location; or
ii. Continued use for employment purposes would have unacceptable impacts on the environment, local amenity or adjacent uses; or
iii. The existing space can be redeveloped for employment uses that achieve an increased level of employment combined with other appropriate uses.

Policy TR2 - Design and Access of New Development
Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;
2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;
3. development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;
4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation

Policy TR3 - Safeguarding of Disused Railway Infrastructure
Disused or redundant railway infrastructure will be safeguarded and development which would inhibit the re-opening or the re-use for transport purposes will be resisted, unless it can be demonstrated that such re-opening or re-use is not realistic or necessary.

Policy BE1 - Design
All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.

Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;
2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;
3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;

4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;
5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;
6. It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);
7. It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;
8. It uses resources, including land and energy, as efficiently as possible through:
   a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;
   b) The layout and form of the development does not preclude the reasonable use of other adjacent land;
   c) Developing brownfield land in preference to greenfield land where possible;
   d) Minimising building exposure while maximising solar gain.
9. Its drainage systems are designed to limit surface water run-of and food risk and prevent pollution;
10. 10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.

Policy EN7 - Important Natural Features
Development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds will only be permitted where:

1. Full account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; or
2. The biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.

Policy SP16 - Environmental Protection
Air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures:

1. Ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels;
2. Giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable;
3. Ensuring that developments do not increase the number of people exposed to pollution

Policy EN8 - Pollution and Land Stability
Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to the following will not be permitted:

1. Air pollution;
2. Noise pollution;

3. Light pollution;
4. Contamination;
5. Land instability;
6. Water (including groundwater) pollution.

Proposals which would create new problems or exacerbate existing problems detailed above will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level.

Future Wales. The National Plan 2040

Future Wales – the National Plan 2040

Future Wales – the National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

Fig.3 The Seven Goals of the Well-being of Future Generations (Wales) Act 2015

As described above, the Welsh development framework has been designed incorporating the principles of sustainable development at its core. This comes as a result of the Well-being of Future Generations (Wales) Act 2015 ('the Act') that gives a legally-binding common purpose – the seven well-being goals – to the public sector to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.

In a more detailed level, the National Plan contains 18 strategic and spatial policies. In view of the nature of the development proposals, the policies below have been identified as relevant to the scheme:

Policy 1 – Where Wales will grow
Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 7 – Delivering Affordable Homes
Policy 8 – Flooding
Policy 9 – Resilient Ecological Networks and Green Infrastructure
Policy 11 – National Connectivity
Policy 12 – Regional Connectivity

Planning Policy Wales (PPW)	**Planning Policy Wales (12th Edition, February 2024)** Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions. Paragraph 2.8 acknowledges that "planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales" and "the most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making planning policy and decision making" as per Paragraph 2.9. PPW defines placemaking as a "holistic approach to the planning and design of development and spaces, focused on positive outcomes". This approach "considers the context, function and relationships between a development site and its wider surroundings" and "adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary". ***Fig.4 PPW Themes Collectively Contribute to Placemaking (extract from PPW Edition 12)*** In light of the nature of the development proposals and their location, the following themes and policy topic areas are identified as relevant. **1. STRATEGIC & SPATIAL CHOICES** Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the development of specific proposals, or when formulating a development plan. <u>Good Design</u> Good design is one of these fundamental choices to creating sustainable places where people want to live, work and socialise. PPW 12 sets out five key aspects of good design which are essential to make placemaking happen:

1) *Access and Inclusivity*

This can be achieved "making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children" (Paragraph 3.6) and through measures and features that "enable easy access to services by walking, cycling and public transport" and "encourage people to meet and interact with each other".

2) *Environmental Sustainability*

Paragraph 3.7 states that "developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement (Paragraph 3.7)" and be resilient through "an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment"

Paragraph 3.8 highlights that "landscape and green infrastructure considerations are an integral part of the design process" and, in a similar manner, addressing land contamination, instability and flood risk and providing for biodiversity benefits should be part of the design.

3) *Character*

Paragraph 3.9 highlights that "the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations". It goes on to say that "the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials" will be particularly important in areas recognised for their particular landscape, townscape, cultural or historic character and value.

4) *Community Safety*

Paragraph 3.11 establishes that "crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions"

5) *Movement*

Paragraph 3.12 states that good design in this matter means "minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys". It also remarks that "existing infrastructure must be utilised and maximised, wherever possible".

<u>Previously Developed Land</u>

Paragraph 3.55 emphasises the preference of previously developed land as opposed to greenfield sites. It advises that "previously developed (also referred to as brownfield) land […] should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome".

The PPW definition of previously developed land is land "which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure".

2. ACTIVE & SOCIAL PLACES

Transport

Paragraph 4.1.11 sets out that "development proposals must seek to maximise accessibility by walking, cycling, and public transport, by prioritising the provision of appropriate on-site". In this respect, "the sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications" as per Paragraph 4.1.14. The Welsh Government policies set out the sustainable transport hierarchy which is, in this order, from walking and cycling, public transport, ultra-low emissions vehicles to other private motor vehicles.

Active travel is a cornerstone of the transport policies in Wales. Paragraph 4.1.31 confirms that "planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling".

With regards to vehicle parking, Paragraph 4.1.50 advises that a design-led approach should ensure that "appropriate level of car parking is integrated in a way which does not dominate the development". Paragraph 4.135 requires new development to "provide appropriate levels of secure, integrated, convenient and accessible cycle parking".

Housing

Paragraph 4.2.1 advises that "new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities".

Paragraph 4.2.18 acknowledges the potential on brownfield sites to deliver further housing when saying that "maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites".

3. DISTINCTIVE & NATURAL PLACES

Green Infrastructure

Paragraph 6.2.1 defines green infrastructure as "the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places" and "at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks".

Paragraph 6.2.11 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that "with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places". It is also advised that "there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents".

Paragraph 6.4.3 states that "the planning system has a key role to play in helping to reverse the decline in biodiversity and increase the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement".

Technical Advice Notes	Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs: • TAN 2: Planning and Affordable Housing (June 2006) • TAN 5: Nature Conservation and Planning (September 2009) • TAN 10: Tree Preservation Orders (October 1997) • TAN 12: Design (March 2016) • TAN 18: Transport (2007)
SPG	The local planning policies are supplemented by Supplementary Planning Guidance (SPG). The following SPGs have been identified as relevant to the development proposals: • Planning Obligations (October 2016) • Parking Standards (October 2016) • Affordable Housing (October 2016) • Biodiversity and Geodiversity (May 2018) • Pollution (October 2016) • Open Space & Greenspace (July 2017) • Renewable and Low Carbon Energy (July 2017) • Design (July 2017) • Development and the Welsh Language (July 2017)
Planning History	
Planning History	The following planning history relates to the application site: • P2010/1195 - Application to vary Condition 3 of P2006/1503 (Residential Development Outline) to extend the period for the submission of reserved matters to the 27th February 2015 (Bat and Reptile Survey - Rec 26-03-13) – Withdrawn • P2006/1503 - Outline application for residential development (60 units) with associated access and engineering works – Approved 27.2.2008. • P2004/1078 Amendment to condition 2 (height of storage tank from 5.7 m to 6.15m) - relating to previous planning consent P2004/0659- Approved 31.8.2004. The applicant has also previously submitted representations under the RLDP process for this site under reference RLDP/AMV/2003.
Analysis	
Principle of Development	The proposed redevelopment aims to transform the long-vacant former Swelco Factory site in Cwmgors for a high-quality, affordable housing development. The site, previously classified under Use Class B2 (General Industry), has been unused since 2002 due to evolving industrial demands in the area. The prolonged vacancy and deteriorating condition of the site provide clear evidence that it is no longer suitable or desirable for industrial use. The application site lies within the settlement boundary of Cwmgors and is unallocated for any other purposes. The principle of the residential re-development of the site for residential use is therefore in accordance with Strategic Policy SP3 (Sustainable Communities) and Policy SC1 (Settlement Limits), and

	would contribute towards the general and affordable housing targets as identified in Strategic Policies SP7 and SP8, the former of which includes for an allowance for the provision of 825 dwellings on large windfall sites. This is reflected in pre-application discussions with the LPA and also the site's planning history, which includes a (now lapsed) planning permission for the construction of 60 dwellings. It is concluded that the principle of the residential development of the site is therefore acceptable and in full compliance with the development plan.
Design and Amenity	The Design and Access Statement that accompanies this planning application provides full details of the development in this regard following the PPW's key aspects of good design: Access and Inclusivity; Environmental Sustainability; Character; Community Safety; and Movement. The scheme seeks to deliver a well-designed and well-informed residential development of 45 affordable dwellings which effectively integrate with the existing residential neighbourhood and highway network compliant with local policy. The vision for this scheme is to deliver attractive, high-quality affordable homes while transforming a redundant and derelict brownfield site into a visually appealing and sustainable environment. The development presents an opportunity to remediate existing contamination and address invasive species, allowing for the creation of new habitats and thoughtfully landscaped areas. These enhancements will be carefully managed, ensuring long-term ecological and visual benefits that would not be achievable if the site remained in its current neglected state. The proposed affordable housing mix comprises: **Schedule of Accommodation** Affordable Ref Description M² No. 211 1 Bed 50 16 No. 421 2 Bed 82 17 No. 531 3 Bed 93 10 No. 641 4 Bed 110 2 No. Total 45 No. The dwellings will follow a linear formation reflective of development along Heol y Gors Road. However, the placement of plots is planned as such to avoid a rigid appearance, adding visual interest. Policy BE1 (8a) of the adopted Local Development Plan states that 'normally a minimum of 35 dwellings per hectare in the Coastal Strategy Area or a minimum of 30 per hectare in the Valleys Strategy Area' will be required. This site falls within the Valley Strategy Area where a minimum of 30 dwellings per hectare will be required. The application site is approximately 1.77 hectares in size as 45 units are proposed this would equate an overall site density of 25 dwellings per hectare. The density is thus below the minimum required. This is however justified to be able to adapt to the grounds conditions of the site, accommodate the appropriate drainage infrastructure and biodiversity enhancement/mitigation to align with PPW Edition 12 Chapter 6 requirements. Therefore, it is considered that a reduction of the quantum of development is suitable and a necessary adjustment in this instance. Significant areas of amenity space are retained and enhanced through the design of the development and these areas as shown on the layout plan will either comprise of strategic landscaping, new and enhanced habitats for biodiversity or to accommodate sustainable drainage solutions. Policy BE1 also requires that development complements and enhances the character and appearance of the site; respects the context of the site and its place within the local landscape; utilises materials appropriate to its surroundings; and incorporates appropriate landscaping. The design of the development relates to the context and character of the surrounding locality. The mix of external materials have also been accepted in principle by NPTC through pre-application engagement.

The principal characteristics of the proposed development's appearance are designed to ensure robustness, longevity, and visual cohesion. The design employs a limited palette of materials and architectural forms to create a strong visual identity. The scheme draws on inspiration from local materials and traditional design elements such as pitched roofs.

The scheme incorporates low-maintenance finishes, including red clay facing brick with detailed brickwork and rendered elevations on key plots. Grey PVCu windows are also specified to comply fully with Building Regulations and Secured by Design standards. Roofing materials will consist of plain, smooth clay tiles in a smooth brown finish, complemented by black PVCu rainwater goods. Additional detailing includes brown PVCu soffits and fascias, along with brown vertical boarding on projecting elements of the buildings, contributing to a unified and durable aesthetic.

The scheme ensures appropriate separation distances of over 21m between the proposed dwellings and existing neighbouring properties would be screened through existing and proposed boundary treatments and vegetation, thereby preventing any adverse impact on the amenity of both proposed and existing occupants in terms of overlooking or overshadowing. The dwellings will be complemented by public-facing soft landscaping buffer. The site layout also identifies areas where close boarded timber fencing and high screen wall are proposed (both 1.8m tall).

The proposed open areas within the scheme are within the secure rear courtyard and overlooked by all dwellings. Ground floor apartments also have direct access to the public areas. The gated access to the rear courtyard provides a safe and secure environment for the residents of the scheme to use and enjoy. Adequate lighting will be installed where required, whilst the orientation of the dwellings means that parking areas will benefit from natural surveillance to protect people and property by contributing to the safety of public spaces and routes. The proposals will furthermore achieve Secured By Design Gold Standards.

Due to the topography of the site new retaining structures and engineered embankments are required to facilitate the construction of the dwellings and highway. As requested, details of retaining and embankment works have been provided with the submission of this planning application together with sections and cross-sections through the site. In accordance with criteria 3 of Policy BE1 the retaining works and embankments also integrate new landscaping.

The proposed highway arrangement includes linking a new estate road to the existing access point on Heol y Gors, with two sets of private driveways located in the central and southern parts of the site. This arrangement was previously approved under the existing lapsed planning permission for the site. It has also been previously confirmed that safe access can accommodate a larger number of dwellings than currently proposed. Although some trees will need to be removed to facilitate the widening of the access for visibility purposes, as well as between plots 41 and 42, compensatory planting is proposed throughout the site and depicted on the proposed Soft Landscaping Plan. All 1-bedroom properties (walk-up apartments) are proposed to be provided 1 car parking space allocation and all other properties are planned to have 1 space per bedroom to up a maximum of 3 spaces.

The site is located within a well-established residential area, benefiting from excellent connections to pedestrian pathways and public transport. The location also offers numerous opportunities to promote active travel. The proposed road layout includes a designated footpath, ensuring clear and safe separation between pedestrians and vehicles. Communal external spaces are also designed to be overlooked, enhancing safety and security for residents. Additionally, sufficient external lighting will be installed in these areas to further promote safety and usability. The existing PROW will also be retained and enhanced through removal of invasive species.

A further key aspect of the proposal is the enhancement of biodiversity through the introduction of a comprehensive landscaping strategy, including sustainable drainage systems (SuDS). This ensures the development aligns with sustainable development principles while transforming the site into a more valuable space.

Fig.5 Proposed Site Plan

	The proposed redevelopment will significantly enhance the visual quality of the site and provide a complementary development to the existing surrounding settlement. The site will however maintain its own sense of identity, and adhere to the principles of good design. It is therefore concluded that the design and layout of the scheme is of a high quality, meeting all relevant criteria within Policies SP3, SP4, AHI, TR2, BE1 amongst others.
Highways Impact and movement	A Transport Statement has been prepared for the scheme, which addresses highway matters such as traffic generation, highway safety and parking to ensure compliance with TAN18, along with Policy SP20 and other associated Local Development Plan policies and guidance. The existing access to the site is to be widened to ensure appropriate visibility and turning spaces are achieved, and that the road is brought up to an adoptable standard, including provision of footways, of which have been designed to the most appropriate yet achievable standard on this site, without severe detriment to loss of ecology, and considered against other site constraints. Notably, the comments received from the Highways Department have been investigated by the team. The existing site access off Heol-y-Gors consists of an asphalt access road, circa 5.0m in width, with narrow berm either side, which then batters down to the site boundaries. The batters range in height up to a maximum of circa 3.05m. It is suggested that the batters between the access road and site boundaries would have been required in order to achieve a satisfactory longitudinal gradient (circa 1 in 20) along the access between Heol-Y-Gors and the lower, generally level, development plateau below. The proposed access to the new residential development consists of a 5.5m wide carriageway with 2.0m footway to the north. The horizontal and vertical alignment of the new access road has been designed to achieve a 15.0m long 'platform' (maximum longitudinal gradient of 1 in 20) at the junction with Heol-y-Gors. Elsewhere, longitudinal highway gradients have been designed to a gradient of not more than 1 in 12 or less than 1 in 150 – all in compliance with NPT Highways' requirements. A narrow berm is proposed either side of the proposed access to allow for fencing/barriers as required. A max. 1 in 2 batter is then proposed from the access road down to existing site boundary levels. The Land Registry plans indicate a minimum width of land ownership of circa 9.38m at the access of Heol-y-Gors. Therefore, there is insufficient space within the Client's land ownership to provide a 2.0m footway on each side of the proposed access bellmouth. A 2.0m footway has therefore been provided to the north of the proposed access which would connect with the existing footway to the north. Note that there is an existing footpath link within the development which links with the existing footway adjacent No.173 Heol-y-Gors. This would provide a pedestrian connectivity to the south. The provision of any more extensive footway always creates an issue against retaining important habitats on the site as much as possible, given that losses are unavoidable at the access point. Visibility splays of 2.4m x 45m are available at the junction between the access and Heol y Gors and two sets of private driveways will be located in the central and southern parts of the site. This arrangement was previously approved under the existing lapsed planning permission for the site. In regard to traffic generation, the TRICS trip rate database has been reviewed (Table 1 of the Transport Statement) and it has been confirmed that the change of the use of the building would result in a positive impact due to removing the possibility of high-volume HGV traffic. Further traffic calming measures are also incorporated within the Transport Statement. The proposed parking provision for the scheme follows the appropriate parking standards of 1 space per bedroom with a maximum of 3 spaces per dwelling. Visitor parking has been thoroughly considered and it is deemed that it is not necessary to provide dedicated visitor parking as it has been seen that visitors

tend to ignore these bays and ultimately park as close as possible to their desired property. This results in the property often adopting this space as their own, taking it away from visitors. It has therefore been concluded that on this scheme it would make more logical sense to provide visitor parking at the kerbside. The design of this development is such that properties are arranged on one side of the street only. It is therefore considered that a modest level of on street parking can be accommodated safely.

In terms of cycle storage, the scheme will provide 1 stand per 5 bedrooms in accordance to parking standards for the two blocks each containing 6 flats. In terms of sustainable travel, the site is exceptionally located for new occupiers to be able to meet their day-to-day needs without reliance on private motor vehicles.

The site is very well connected to local facilities and amenities. A PROW crosses the site which allows access to the main road. This connection will be improved as part of the site's remedial works. The following amenities and facilities are walkable from the site, ensuring daily needs can be met:

Fig.6 Facilities/Amenities available within walking distance

Facility	Distance (m)
Cwmgors Community Centre	140
Cwmgors Chinese Take Away	200
Abernant Bee Friendly Park	210
Indulgence Beauty Salon	350
Youth Circus	700
Fraser Foods	750
Kylie Barbers	800
Maerdy Playing Fields	1100
Bond St Dentist	1150
Poptys Bakery	1200
Cresci's Cafe	1200
CK's Foostore	1300
Premier Shop	1400
Amman Valley Doctors Practice	1400
GCG Pharmacy	1400
Cwmgors RFC	1700

Figure 5 of the Transport Statement depicts the areas within a 5-mile catchment area for cycling. This catchment area is intersected by National Cycle Network Route 437, which connects Ammanford and Cwmllynfell. A bus stop is located adjacent to the site on Heol y Gors Road of which the 905 and X26 services operate. The 905 connects to Neath College main campus and the X26 provides links to Swansea Bus Station.

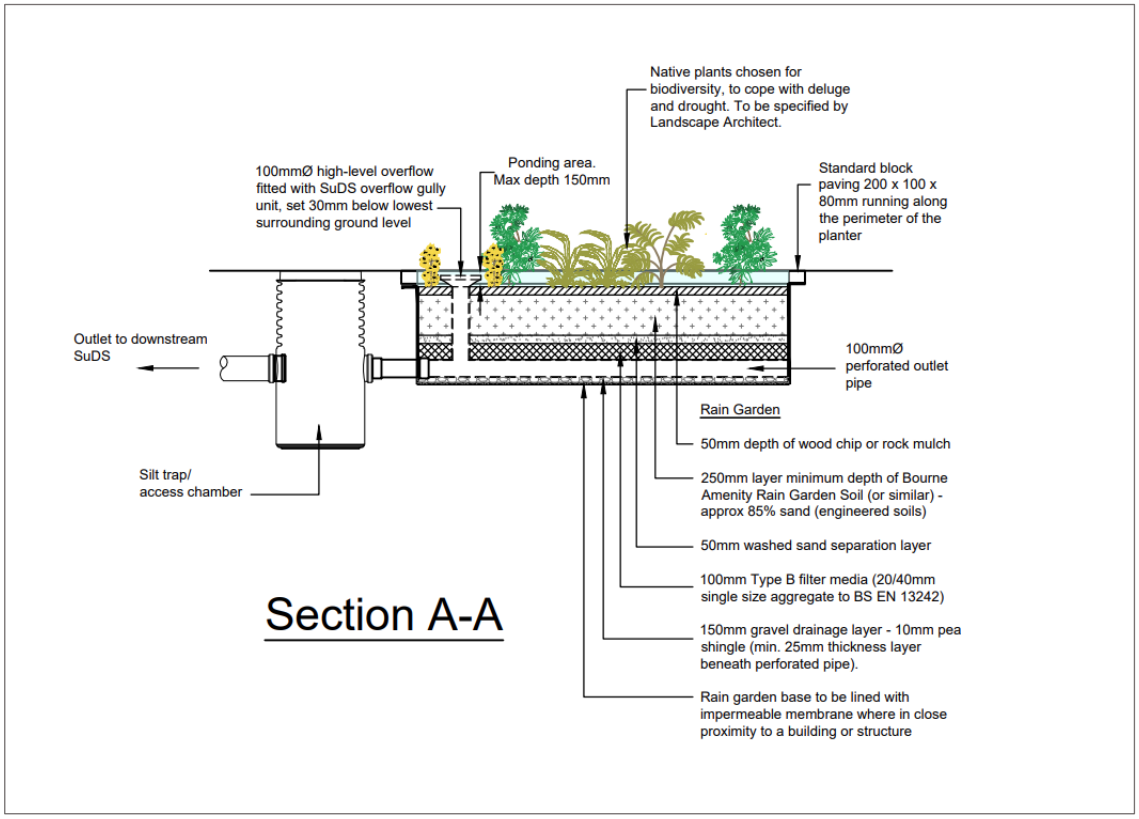
It is therefore concluded that appropriate and safe highway provision can be made on site, and that the site is suitable in regard to its location to be able to travel to and from sustainably. There will be no material impact to the operations of the highway. Furthermore a previous lapsed planning permission identified that planning was permissible for a scheme of 60 unit without any such impacts to the highway. Therefore it is asserted that the development is policy compliant and transport considerations should not preclude its development. The development adheres with LDP Policies TR2, TR3, SP3 and TAN18.

Drainage	A detailed Drainage Strategy has been produced for the Site and full technical details will be submitted for approval under a SAB application. The strategy to drain the site ensures effective management of surface water and foul water, incorporating Sustainable Drainage Systems to minimise flood risk, enhance water quality, and promote biodiversity. The scheme also achieves a significant betterment in runoff rates compared to pre-development conditions, contributing to the overarching objectives of sustainable and resilient infrastructure.

The surface water management system includes a combination of permeable paving, rain gardens, swales, and linear SuDS basins. These features will intercept, treat, and store surface water runoff while reducing peak discharge rates. Porous asphalt driveways are proposed to allow infiltration, while rain gardens will provide interception and initial treatment. Swales and SuDS basins are integrated into the design to manage highway runoff, ensuring effective storage and treatment prior to discharge. Additionally, silt traps will be installed at permeable pavement outlets to prevent sedimentation, and GreenBlue Urban SuDS Pods will intercept and attenuate roof runoff where appropriate.

To ensure compliance with local standards, surface water discharge rates will be restricted to the pre-development brownfield Qbar rate of 54.1 l/s, achieving a betterment of between 33% and 37% across storm events up to a 1 in 100-year event.

Fig.7 Rain Garden Section



The rain gardens will be located near plots 41-45, 37-38, 12-15 and adjacent to plot 30. The planting scheme includes a diverse selection of species chosen for their ability to thrive in wet conditions while supporting biodiversity. The mix features vibrant and resilient plants such as Geranium Rozanne, Deschampsia cespitosa, and Cornus sanguinea 'Midwinter Fire,' which provide seasonal interest and structure. This is complemented by Juncus effusus, Hemerocallis 'Red Rum,' and Bergenia cordifolia, adding texture and colour to the rain garden.

Foul water will be managed through a combination of adoptable and non-adoptable foul water drains, with connections to the existing sewer network where feasible. Inspection chambers and manholes will be installed to ensure system robustness and ease of maintenance.

Ecology	In line with both Policy EN7, as well as wider National Policy, a suitable Preliminary Ecology Appraisal has been included with this submission, along with a suitable and appropriate Green Infrastructure Statement. The findings and recommendations can be summarised as per below: **Grassland Habitat** The site is comprised of bare soil with rubble, scrub and tree piles, along with Japanese Knotweed, of which remediation has commenced. To ensure no harm to any mammals who may be using rubble/scrub piles for artificial refugia no works will be undertaken until the spring when hibernation is over. Reptile surveys are also to be undertaken around the boundaries of the site between April and September (7 visits) to determine presence or absence. **Linear Boundary Features** The linear features on both the eastern and western boundaries are suitable for supporting dormice, reptiles, bats and nesting birds. Dormouse nest boxes will be installed and findings recorded between March and November. **Northern Outbuilding** This building is in a state of disrepair with damp conditions and was assessed as being low/ moderate for bats. A dusk survey will be undertaken, with a follow up survey should this be required. **Main Factory Building** The building has the potential to support bats and has the potential to be a winter hibernation roost. Winter hibernation checks will be undertaken January / February using static monitors to be left on site for 10 consecutive nights. There are a number of areas where the mortar is missing in the brickwork therefore it is proposed that during the winter months these are checked by an ecologist using an endoscope from a mobile elevated platform. If the gaps do not go anywhere or are free from bats, then they will be blocked using a hessian cloth to prevent any use of them by bats again reducing the survey effort. If bats are found, then they will be left undisturbed and be recorded as such for the licence application. **Main Factory Building Extension** Bat droppings were found in this building which will be sent off for examination to determine species. Two surveys will be undertaken on this building based on the presence of droppings. **Watercourse** A watercourse runs beneath the site and the identified wooded ghyll which runs along the eastern boundary within the centre of the site was confirmed to form part of the Neath Port Talbot Waterways SINC. This watercourse is hydrologically linked to the Afon Garnant which lies 227m west of the site. It is concluded that the development has the opportunity to enhance the SINC through its remediation of invasive Japanese Knotweed. Furthermore, construction would be strictly controlled to ensure no pollution or spill into the watercourse. It is important to highlight that the prolonged vacancy of the site has resulted in contamination and the encroachment of invasive species. Japanese Knotweed, Rhododendron, Virginia creeper, Cotoneaster, Snowberry, and Wilson's honeysuckle will be systematically eradicated from the site and its surroundings, with appropriate measures in place to prevent their spread during development. Additionally, the site's contamination is being thoroughly remediated. These actions will create a healthier environment, allowing natural habitats to flourish and supporting the long-term sustainability of the biodiversity of the site, which if left unmanaged would diminish overtime.

	It is asserted that adherence to the above recommendations, along with sensitive construction practices, important remediation and required licensing that there will be no harm to existing species or habitats of ecological value. Where removal of existing vegetation has been unavoidable, either due to the development or due to other reasons, this has been minimised and then mitigated with new planting and ecological measures to ensure the appropriate restoration of habitats. A comprehensive landscaping proposal has been proposed for the scheme as detailed in later sections of this document. The site will be enhanced by the introduction of new native tree planting, native hedge planting, new shrubs including plants known to benefit wildlife, wildflower meadow areas and other habitat types. The appended GIS further demonstrates compliance with the step-wise approach.
Landscape & Green Infrastructure	To demonstrate compliance with the LDP, along with National Policy Guidance on Green Infrastructure (PPW Edition 12 Chapter 6) a Comprehensive Soft Landscaping Proposal has been prepared and appended with a suitable Green Infrastructure Statement. Given the nature of the proposed development, a portion of the site will be occupied by buildings, access roads, and parking areas. However, the layout has been carefully designed to maximise the available green space, aligning with the Green Infrastructure objectives of the scheme. It is important to highlight that the site, currently contaminated and underutilised, will be restored to a visually attractive and functional environment. The remediation process will address both the contamination and the presence of invasive species, such as Japanese Knotweed, which would otherwise degrade the site over time. Remediation work has already commenced, mitigating further environmental harm and preparing the site for the establishment of new planting. This ensures that the proposed planting scheme will have the best possible conditions for long-term success and biodiversity enhancement. The landscape proposals have been designed to contain a range of measures to ensure GI is maintained and enhanced as part of the development. Key measures include: • Native tree planting around the site. This provides an attractive setting for the development and adds to the existing landscape infrastructure. • Native hedge planting to boundaries provides a food source and nesting opportunities for birds. • Shrub planting including species known for wildlife value. This softens building frontages and enhances biodiversity. • The inclusion of wildflower meadow area to the SUDS features and around the site generally provides further ecological benefits and enhances the external environment. • Installation of bat and bird boxes and the creation of new habitats that support local wildlife as outlined in earlier sections of this document. ***Fig.8 Soft Landscape Proposal***

	The design of the site clearly demonstrates the application of the Step-Wise Approach, ensuring that the natural environment is respected and preserved wherever possible. The majority of the existing healthy trees along the eastern and western boundaries of the site will be retained, minimising the impact on the existing vegetation. Where the removal of vegetation has been necessary, whether due to the development or other factors, this has been carefully minimised. Furthermore, any loss has been mitigated through a comprehensive strategy of new planting and ecological interventions, ensuring the restoration and enhancement of habitats. It is therefore affirmed that the development complies with relevant National Policy guidelines, along with Policies BE1, EN7, EN6 along with the Biodiversity and Geodiversity SPG.
Welsh Language	The proposed development aligns with Policy SP22 and Policy WL1 of the Neath Port Talbot Local Development Plan (LDP), which designate the site as being within a Welsh Language Sensitive Area. The application is supported by a Welsh Language Impact Assessment and Action Plan, which demonstrates compliance with the relevant policies and ensures that the Welsh language and culture are preserved and enhanced through the proposal. The assessment confirms that the development will not adversely affect the proportion of Welsh speakers in the community. While a slight increase in English speakers may occur, this is not expected to result in a proportionate decline in Welsh speakers. The scheme focuses on supporting local residents by offering 100% of the proposed homes to individuals and families on the local affordable housing register, which helps to retain the existing community and mitigate the risk of out-migration. The mix of housing types caters to families of various sizes, ensuring the development aligns with the demographic needs of the area. This approach prevents significant changes to the community's age structure or social dynamics. Families moving into the development are likely to have children already enrolled in local schools, ensuring continuity and stability of existing Welsh speakers remaining in Local Schools. The development does not displace any existing businesses, community, voluntary, or youth groups. On the contrary, it supports local economic activity by increasing the immediate local population, which in turn benefits nearby businesses. As the development is for residential purposes and addresses the specific demand for social housing in Cwmgors, it does not disrupt local Welsh traditions or cultural practices. The Applicant is committed to supporting the use of the Welsh Language and will encourage practice as part of implementing the proposed development. The following measures will be implemented to enhance the development's positive impact: • Using bilingual signage where appropriate • All external correspondence will be provided in Welsh and English where possible • Supporting the local supply chain (where possible), including sourcing construction services and operational labour locally • Providing Welsh Street names The applicant is also committed to supplying a 'Welcome Pack', placing the language in its context and setting out the local Welsh language provision. It will also be able to provide a list of clubs and activities within the Cwmgors area that allow new residents to keep in touch with the local Welsh culture. This will include the activities based at the Cwmgors Community Hall which situates itself at a 12-minute

	walking distance from the proposed development site. The activities include various walking clubs, Cwmgors Rugby Club, Pony Club and Merced y Wawi. The proposed development demonstrates full compliance with Policy SP22 and Policy WL1 through its careful consideration of the Welsh language and cultural impacts, commitment to affordable housing provision, and support for the local community. By addressing key social, cultural, and economic factors, the scheme reinforces its alignment with the Neath Port Talbot LDP and Welsh Language SPG.
Trees	This application is accompanied by a detailed Tree Survey & Constraints Plan, which has been a key consideration in developing the design proposals as identified in earlier sections. Most of the existing trees on the development site are located around the site peripheries. The siting of buildings and infrastructure has been developed around the RPAs of the higher quality trees wherever possible ensuring that, for the most part, only low-quality and dangerous trees require removal. The exception to this is in respect of the access where the requirement to realign and widen the access road will result in the loss of some mature, Category B trees. Given that alternative options for access have been fully explored and dismissed this represents an unfortunate, but inevitable, consequence of securing the regeneration of the site. To mitigate the loss of these trees and enhance the site's green infrastructure, the Soft Landscape Proposals include the planting of 42 new trees. This number is proportionate to the space available, the retained trees, and their future growth requirements. Where higher-value trees are unavoidably lost, replacement planting will be undertaken on a 3:1 basis, consistent with the recommendations of PPW.
Noise	It is not considered that the proposed development would give rise to any concerns in respect of noise and air quality which would warrant further consideration as part of the application process. The previous planning permission for the site sought the development of 60 dwellings and no concerns were raised in regard to this consideration, nor any requirement for third party work triggered through the pre-application engagement process.
Contamination	Given the long-term vacancy of the SWELCO Factory and the years of fly-tipping and vandalism the site has endured, the applicant is committed to thoroughly investigating and remediating any contamination present. A comprehensive site investigation has been undertaken and any recommended follow-up actions are being diligently implemented. Remediation for contaminants will include measures to improve ground quality. Appropriate construction methods, as advised by a qualified geo-environmental engineer, will be employed. Additionally, the applicant is committed to protecting the site's watercourse throughout the redevelopment process. It is therefore affirmed that the proposal will comply with policies SP16 and EN8 of the LDP.
Conclusion	
	The principle of re-developing the site is wholly appropriate given the sustainable location of the site within Cwmgors and the previously developed nature of the land. The form and appearance of the development will respond to the character of the area and ensure good conditions of residential amenity. The location of the development is also highly sustainable given the availability of services and facilities nearby and the key link to the core transport network. The provision of affordable housing accords with the affordable housing need for the area and development of this Site for residential purposes is in line with the various relevant Policy. It has also

	been agreed through pre-application engagement that the retention and conversion of the former factory main building is not viable nor desirable. Biodiversity and habitats have been considered and appropriately assessed to the extent that the development will not cause any harm subject to measures for protection, mitigation and enhancement. The scheme furthermore incorporates strategic design, green infrastructure and landscaping to integrate into the Site's character and landscape context. For these reasons, it has been established that the design of the scheme demonstrates placemaking in action. The aforementioned factors also show how closely the residential development complies with the PPW and all applicable TANs that make up national policy. The plan also complies with the key principles of the Neath Port Talbot council LDP and the recommendations made in the adopted SPGs. In conclusion, the proposed development is suitable, sustainable, strategic and is fully consistent with the planning policy framework.