

PLANNING STATEMENT

RHOSAFAN PRIMARY SCHOOL

June 25



Summary

Proposal

Demolition of the existing primary school and Tir Morfa Centre and construction of a new school, sports pitch, play facilities, highway and access works, plant, substation, sprinkler tank and associated works

Location

Rhosafan Primary School, Marine Drive, Port Talbot, SA12 7NN

Date

June 25

Project Reference

24.142

Client

Neath Port Talbot County Borough Council and Morgan Sindall

Product of

Asbri Planning Limited
Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff CF23 8RS

Prepared by

Liam Griffiths | Principal Planner

Approved by

Barrie Davies | Director

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Introduction

- 1.1 Asbri Planning is appointed as planning agent to Neath Port Talbot County Borough Council and Morgan Sindall to prepare this Planning Statement to accompany Demolition of the existing primary school and Tir Morfa Centre and construction of a new school, sports pitch, play facilities, highway and access works, plant, substation, sprinkler tank and associated works at Rhosafan Primary School, Marine Drive, Port Talbot, SA12 7NN.
- 1.2 The purpose of this Planning Statement is to provide a clear and logical document to outline the planning considerations and planning policies relevant to the proposal. The document also acts as a method of demonstrating the details of the planning application in a way that can be read both by professionals and the public.
- 1.3 The Planning Statement acts as a supporting document to the accompanying planning application and should be read in conjunction with all other elements of the application. The following drawings prepared to accompany the application:

Drawing name	Drawing reference
Site Location Plan	26CC04-ARC-30-ZZ-D-A-100000-P3
Existing Site Plan	26CC04-ARC-30-ZZ-D-A-100001-P3
Demolition Plan	26CC04-ARC-30-ZZ-D-A-100002-P1
Proposed Site Block Plan	26CC04-ARC-30-ZZ-D-A-100101-P4
General Arrangement Plans	26CC04-ARC-31-ZZ-D-A-200000-P10
General Arrangement Plan - Roof	26CC04-ARC-31-ZZ-D-A-200001-P10
Planning Elevations	26CC04-ARC-32-ZZ-D-A-200500-P4
Planning Sections	26CC04-ARC-33-ZZ-D-A-200600-P2
Detailed Planting Plan	26CC04-FRL-30-XX-D-L-1300
Proposed Landscape Layout	26CC04-FRL-30-XX-D-L-1500
Proposed Winter Garden Layout	26CC04-FRL-30-XX-D-L-1501
Boundary Plan	26CC04-FRL-30-XX-D-L-1503
Landscape Detail	26CC04-FRL-30-XX-D-L-1504
Bin and Compound Elevations	26CC04-FRL-30-XX-D-L-1505
Site Sections	26CC04-FRL-30-XX-D-L-1800
Green Infrastructure Strategy	26CC04-FRL-30-XX-D-L-2020
Furniture and Feature Plan	26CC04-FRL-30-XX-D-L-2021
Sprinkler Tank Details	26CC04-CFS-XX-XX-D-OH-0006
Drainage Layout	26CC04-HYD-52-XX-D-CS-3000-P07
Substation Elevations	EKV0014 / EKV0015

- 1.4 In addition, the following supporting documents are submitted.

Document name (reference where appropriate)	Prepared by
Application Forms	Asbri Planning

PAC Report	Asbri Planning
Design and Access Statement	Arcadis
Planning Statement	Asbri Planning
Topographical Survey	Gwalia Surveyors
Baseline Noise Survey	Formant
Bat Surve	Ecological Services
Energy Statement_P01	Stantec
Green Infrastructure Statement	Fenton Reece
Ground Investigation Report	Tetra Tech
Preliminary Ecological Assessment	Ecological Services
Transport Assessment	Asbri Transport
Travel Plan	Asbri Transport
Tree Report	ArbTS

1.5 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:

- Section 2: provides a description of the site and its surroundings, including a review of the site's planning history;
- Section 3: summarises the development proposals.
- Section 4: provides an overview of pre-application dialogue undertaken in regard to the emerging scheme.
- Section 5: outlines the relevant planning policy context, at both the national and local level.
- Section 6: addresses the key planning considerations associated with the development proposal.
- Section 7: provides a conclusion regarding the overall acceptability of the application.

Site Description

The site

- 2.1 Ysgol Gymraeg Rhosafan is located in the Sandfields area of Port Talbot, approximately 2.5km west of the town centre. The Swansea Bay shoreline lies around 500m to the west. The site is a roughly square parcel containing an irregularly shaped school building, surrounded by parking areas, access routes, playing fields, and hardstanding for sports and play. The site is centred on the following grid coordinates: E: 273949; N: 190492.
- 2.2 The site is set within a residential area, with homes bordering it in all directions, though Marine Drive separates the site from properties to the northeast. Access is currently secured directly off Marine Drive.
- 2.3 The site lies outside any flood zones for river flooding but partly falls within Zone 2 for surface water and small watercourse flooding.
- 2.4 There are no listed buildings within the site boundary. A Grade II-listed War Memorial stands approximately 1.2km southeast of the site within the Vivian Memorial Park. The park appears on the 1939 Ordnance Survey map, with the memorial already in place by that time.
- 2.5 A review of the Coal Authority interactive map shows the site is within a coal mining reporting area but is not classified as a development high-risk area.
- 2.6 There are no Public Rights of Way crossing the site. However, a Public Right of Way forms part of the Wales Coastal Path along the seafront, approximately 500m west.
- 2.7 Several bus stops are located close to the site, making it a highly accessible and sustainable location. Service 84 departs from the Western Avenue School bus stop, providing direct connections to Swansea.
- 2.8 Port Talbot Parkway is approximately 3km east of the site, with an adjacent public bus stop. On the town centre side of the railway track, a bus depot serves as a key transport hub for Port Talbot, as identified in the Local Development Plan (LDP).

Planning History

- 2.9 The site possesses the following planning history;

Proposals	Date determined	Decision
P2010/1181- Erection of a 2.4-2.7m high front boundary fence and gates	04/01/2010	Approved
P2011/0579- Erection of a demountable classroom with covered link to connect to existing demountable classroom	10/08/2011	Approved
P2020/0023- Four Classroom Extension To Existing School	09/01/2020	Approved

P2020/0474- Details pursuant to conditions 3 and 4 (Land Contamination) of Planning Application P2020/0023	20/07/2020	Approved
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The Proposed Development

- 3.1 Ysgol Gyfun Gymraeg Rhosafan Primary School is located in the Sandfields area of Port Talbot, approximately 500 metres north of Aberavon Beach. The site is surrounded by residential properties in all directions, with Marine Drive forming the northeastern boundary. The current access to the site is taken directly from Marine Drive.
- 3.2 The site accommodates an existing school building, which is planned for demolition as part of the redevelopment. The replacement school will provide modern teaching and learning spaces, sports and play facilities, and community amenities in line with the needs of NPTCBC Education Team and stakeholders. The new development will cater to:
- 511 primary school pupils plus 16 part days (Monday – Thursday). Total: 527 pupils; and
 - 57 primary school staff
 - The retained Tir Morfa services at the proposed new school will consist of 30 learners and 20 staff. The Tir Morfa services are contained within the confines of the school building.
- 3.3 The new school will be designed and delivered while ensuring that the existing school and community facilities remain operational throughout the construction phase. Once the new school is complete, the existing primary school and training centre/outbuilding will be demolished.
- 3.4 The project has been designed in accordance with the principles of sustainable development, targeting optimal energy efficiency, and achieving BREEAM “Excellent” certification, alongside Secure by Design principles and a Carbon Net Zero approach.

Amount, Scale and Layout

- 3.5 The proposed development comprises a part single and part two-storey school building with associated sports pitches, play areas, highway and access improvements, and extensive landscaping. The scheme has been designed to deliver a modern, high-quality educational facility, ensuring a stimulating and engaging learning environment for students.
- 3.6 The site layout has been carefully designed to optimise natural light, energy efficiency, and accessibility. Classroom arrangements have been configured to maximise daylight penetration, supporting passive heating and cooling strategies in line with sustainability objectives. The Winter Garden, an integral feature of the design, enhances indoor-outdoor connectivity, providing an adaptable learning space that supports biophilic design principles.
- 3.7 The new school building is centrally located on the site, positioned to create clear pedestrian circulation routes while maintaining appropriate buffers from neighbouring residential properties. The sports pitch is located near Marine Drive and will be enclosed by a 7.4m high ball-stop fence, ensuring security and safe use of the facility. Surrounding the building are expansive play areas and outdoor learning spaces, designed to support both recreation and educational activities.

Appearance

- 3.8 The architectural design of the two-storey entrance block incorporates distinctive materials and a projecting canopy, creating a welcoming and identifiable main entrance. The building's façade integrates a combination of low-carbon materials, including timber cladding, brickwork, and aluminium standing seam elements, reinforcing the project's commitment to sustainability and durability.

- 3.9 The overall massing and elevation treatments reflect the school's functional and environmental objectives. The use of light-coloured materials, large glazed sections, and natural textures ensures visual harmony with the surrounding landscape. The roofline incorporates varied heights, with the main roof at 8.45m, the teaching block at 3.75m, and the Winter Garden structure at 5.9m, ensuring an elevational approach that integrates well into the existing context.
- 3.10 The design takes inspiration from the local identity, incorporating natural materials and landscape elements to create a coherent and contextually responsive development. A standout feature is the Winter Garden, a semi-enclosed external learning space that seamlessly blends indoor and outdoor environments, enhancing both biodiversity and educational opportunities. This element plays a crucial role in the school's sustainability strategy, providing climate-responsive learning spaces and improving site-wide environmental resilience.

Access and Parking

- 3.11 The site is located in the Sandfields residential area of Port Talbot, near Aberavon Beach. The existing school currently accommodates 406 pupils, with an associated training centre, the Tir Morfa Centre, which provides adult education and childcare services. A new vehicular access arrangement will include separate entrance and exit points on Marine Drive, accompanied by a one-way internal circulation system. The site will also feature a dedicated drop-off and pick-up area to mitigate congestion on Marine Drive. The project will retain existing bus laybys for school transport services.
- 3.12 The development will provide 107 parking spaces, including designated drop-off/pick-up areas and three minibus spaces. The design incorporates disabled parking and cycle parking facilities in line with Neath Port Talbot's parking guidelines. Sustainability assessments have been undertaken, supporting a 10% reduction in the maximum parking provision due to the site's good public transport and active travel access.
- 3.13 The site benefits from good active travel infrastructure, including pedestrian footpaths, designated crossing points, and access to National Cycle Network Route 4. Safe walking routes to school have been identified by the local authority, ensuring pedestrian-friendly access. Public transport services include several bus routes operating within a short walking distance, with connections to Port Talbot Bus Station and railway stations at Baglan and Port Talbot Parkway.

Green Infrastructure

- 3.14 The proposed redevelopment of Ysgol Gynradd Gymraeg Rhosafan places Green Infrastructure (GI) at the heart of the design, ensuring that the school environment is not only sustainable and resilient but also enriches the learning experience and local biodiversity. The strategy responds to the site's coastal conditions, where wind, salt exposure, and sandy soils have historically limited the success of green features. It also seeks to address the current lack of ecological diversity, as the existing school grounds consist mainly of hardstanding, amenity grass, and scattered trees, with little connectivity to broader natural networks.
- 3.15 Despite the urban setting, the site is strategically positioned within a B-Lines pollinator corridor, part of a national initiative to create wildflower-rich pathways linking existing habitats. It is also located within proximity to eight Sites of Importance for Nature Conservation (SINC), offering opportunities to support regional biodiversity. The GI strategy enhances habitat connectivity by incorporating tree buffer zones, coastal meadow planting, and butterfly bunding, all of which provide shelter, forage, and breeding sites for pollinators such as the Shril Carder Bee, a priority species in the area.
- 3.16 A key focus of the strategy is the integration of Sustainable Drainage Systems (SuDS), which will manage surface water efficiently while enhancing biodiversity. The site will feature rain gardens, bioretention areas,

and permeable surfaces, all of which will mitigate runoff, support resilient planting, and improve local climate conditions. Additionally, interactive water features, such as a rainwater play feature and waterwheel, will be used to educate pupils on water conservation and natural cycles.

- 3.17 The proposal also introduces a range of green learning environments, designed to immerse students in nature. A Forest School, Winter Gardens, and outdoor classrooms will provide dedicated spaces for environmental education, play, and well-being. The Winter Gardens will include flexible green walkways, geodesic learning pods, woven reading dens, and a central amphitheatre, creating a multi-sensory setting for lessons and recreation. Additionally, raised growing beds and polytunnels will allow pupils to engage in hands-on horticulture, fostering a deeper understanding of food production and sustainability. The proposals also include a community garden as per the existing site.
- 3.18 To encourage active travel, the scheme includes dedicated cycle storage with repair stations, improved pedestrian pathways, and boardwalk bridges, seamlessly integrating movement corridors with natural features. These enhancements align with the school's commitment to reducing car dependency and promoting healthier, more sustainable travel choices.
- 3.19 The Green Infrastructure Strategy for YGG Rhosafan will transform the school site into a thriving ecological hub, enhancing biodiversity, promoting sustainable practices, and creating a stimulating educational environment. By embedding nature-led design principles, the redevelopment supports environmental resilience, local wildlife, and community well-being, ensuring long-term benefits for both people and nature.

Pre-Application Discussions

- 4.1 A formal pre-application enquiry was submitted to the LPA on the 4th November 2024. A number of meetings have taken place and the nature of the pre-app response has been summarised below;

Active Travel & Accessibility

- The Active Travel Team has identified concerns regarding compliance with the Welsh Government's Active Travel Act Guidance (ATAG).
- Nearby pedestrian routes have failed active travel audits due to insufficient dropped kerbs and tactile paving, which need to be addressed.
- Cycling access to the site could be improved, with nearby routes also failing audits due to poor signage and infrastructure quality.
- Path widths and accessibility measures (e.g., raised plateaus, dropped kerbs for disabled parking) need to be confirmed to ensure compliance with ATAG standards.
- The cycle storage location near the Year 6 play area should be relocated to a more visible and accessible location.

Biodiversity & Green Infrastructure

- A proportionate Green Infrastructure Statement is required, detailing biodiversity enhancements and a stepwise approach to green infrastructure.
- An Ecosystem Resilience Assessment is required under Section 2 of the Environment (Wales) Act 2016, covering aspects such as ecosystem diversity, connectivity, and adaptability.
- The methodology for ecological mitigation should align with recommendations in the Preliminary Ecological Appraisal and Bat Survey Reports.
- A Protected Species Licence will be required before any work affecting protected habitats.

Environmental Health (Noise & Lighting)

- The baseline noise survey is considered methodologically sound, but the loss of data due to high winds should be supplemented in the full application.
- Noise impacts from the school's playing fields and sports areas have not been fully assessed. Given that out-of-hours use is not proposed, a planning condition may be imposed to restrict evening use.
- Plant noise emissions must be limited to 5dB below background levels, ensuring compliance with BS 4142 and BREEAM Pol 5.
- If floodlighting is proposed, a Lighting Impact Assessment will be required.

Highways & Transport

- A Traffic Management Scheme must be submitted, detailing existing Traffic Regulation Orders (TROs) and proposed changes to prevent obstruction at the site entrance.
- The new access/egress points from Marine Drive must be designed in line with Welsh Government's Active Travel Guidance, including a Swept Path Analysis for all vehicle types (including buses).
- A detailed construction plan for the car park is required, covering gradients, drainage features, and highway construction details.
- Highway safety concerns include the need for:
 - Road safety audits for any works on the public highway.

- A Construction Environmental Management Plan (CEMP) to address construction noise, drainage, site management, and traffic control measures.
- No construction vehicle access during school drop-off and pick-up times.

Drainage & Sustainable Urban Drainage Systems (SuDS)

- SAB (Sustainable Drainage Approval) is required before work begins, as per the Flood and Water Management Act 2010.
- Any groundwater seepage or springs encountered must be reported, and no groundwater should be discharged into the drainage system.
- Surface water and foul drainage must be managed separately, and no surface water should connect to the public sewer without prior approval.
- Riparian responsibilities must be observed, ensuring that any watercourses on-site remain unaltered unless agreed with the Authority.

Actions Arising

4.2 A response has been provided against each of the below matters in italics;

- Address the active travel and accessibility issues by revising path layouts, cycle storage locations, and kerb arrangements. Submit a Traffic Management Scheme, Swept Path Analysis, and a revised car park design.

The Transport Assessment (TA) submitted as part of this application reflects the latest scheme and has been developed in close consultation with Neath Port Talbot (NPT) Highways and other relevant authority stakeholders. The proposed off-site active travel works are limited to relocating a demarcated pedestrian crossing on Marine Drive, aligning with the pedestrian route to Western Avenue and the bus stops. The revised car park layout and swept path analysis have been incorporated into the TA. Vehicle tracking has been carried out to ensure compliance with access and manoeuvrability standards. Originally, the project sought to accommodate contracted school buses within the site, but following further assessment, it has been determined that the existing lay-by arrangements on Marine Drive will remain unchanged. Consequently, there is no requirement to revoke the existing Traffic Regulation Orders (TROs) on these lay-bys. The only required TRO revisions relate to new double yellow line parking restrictions opposite the site exit junction to ensure safe egress. Additionally, some existing double yellow line restrictions to the southeast of the site may become redundant post-opening, subject to further review. Given that the TA already addresses these key elements, no further off-site active travel interventions or modifications are proposed beyond those already discussed and agreed upon with NPT Highways.

- Submit the Ecosystem Resilience Assessment and Green Infrastructure Statement.
These are contained with the planning submission.
- Supplement the noise survey with additional data and provide a full assessment of school-related noise impacts.
The Noise Assessment has been updated to include a statement on why we do not believe there's a need for a detailed sports pitch noise assessment and it now also incorporates details of the building services plant noise assessment and data not available at pre-app stage.
- Ensure SuDS compliance and obtain SAB approval before constructions
A SAB compliant drainage scheme will be delivered for this project inline with legislation.

4.3 Overall, the main concerns relate to active travel infrastructure, ecological requirements, noise impacts, and highways/transport compliance. These have all been addressed as part of this full planning application.

- 4.4 A statutory PAC will be completed in accordance with Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Statutory PAC

- 4.5 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. A statutory PAC was completed from the 19th March 2025 to the 16th April 2025 inclusive.
- 4.6 A total of 3 public comments were received and have been responded to in the PAC report. As a result of the comments a Community Garden area has been added into the proposals. There were no comments received from Local Councillors. The statutory consultees provided responses to the PAC and no significant concerns or issues have been raised.

Planning Policy Context

Introduction

- 5.1 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires *“public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”*.
- 5.2 The Well-being of Future Generations (Wales) Act 2015 plays a significant role in shaping the planning system in Wales, embedding sustainable development principles into planning policy and decisions. The Act reinforces the planning system’s shift towards a holistic, sustainable approach, emphasising that planning in Wales must consider not just present needs but also the well-being of future generations.
- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with **the Development Plan** unless material considerations indicate otherwise.
- 5.4 The Development Plan comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
 - Neath Port Talbot County Borough Council Local Development Plan (January 2016)
- 5.5 In addition to the Development Plan, the Planning Application has been informed by **Policy** and **Guidance** set out in the following:
- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
 - Relevant Supplementary Planning Guidance

The Development Plan

- 5.6 The development plan comprises Future Wales and the Relevant Local Development Plan (Adopted date).

National Development Framework: Future Wales – The National Plan 2040

- 5.7 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. ‘Future Wales’ sets out the Welsh Government’s strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.
- 5.8 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Pages 54-56 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years’ time, as follows:

A Wales where people live:

- 1 ...and work in connected, inclusive and healthy places
- 2 ...in vibrant rural places with access to homes, jobs and services
- 3 ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth
- 4 ...in places with a thriving Welsh Language

- 5 ...and work in towns and cities which are a focus and springboard for sustainable growth
- 6 ...in places where prosperity, innovation and culture are promoted
- 7 ...in places where travel is sustainable
- 8 ...in places with world-class digital infrastructure
- 9 in places that sustainably manage their natural resources and reduce pollution
- 10 ...in places with biodiverse, resilient and connected ecosystems
- 11 ...in places which are decarbonised and climate-resilient

Growth Strategy

- 5.9 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

Policy 1 – Where Wales will Grow

The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- Cardiff, Newport and the Valleys
- Swansea Bay and Llanelli
- Wrexham and Deeside

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

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

Placemaking

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

- 5.13 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

"The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:

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

- *integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment."*

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

Mix of uses

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

Variety of housing

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

Walkable scale

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

Density

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

Street network

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

Plot-based development

To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and local builders, urban growth and regeneration should provide opportunities for the development of small plots. A plot-based approach to development should be promoted, including the subdivision of larger sites to be built in small plots or as a group of plots.

Green infrastructure

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

Biodiversity and Green Infrastructure

5.15 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires *“an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable”* (page 76).

5.16 In addition to this, the associated importance of green infrastructure is highlighted:

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

5.17 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

Policy 9 – Resilient Ecological Networks and Green Infrastructure

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.*

Transport

5.18 Future Wales identifies that transport in Wales is currently dominated by the car and that *“our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people’s everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people’s health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation”* (page 85).

5.19 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *“to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel”* (page 85).

Local Level

5.20 The Neath Port Talbot County Borough Council Local Development Plan covers the period 2011 to 2026. It was adopted in January 2016 and comprises the statutory Development Plan for NPTCBC. A review of Neath Port Talbot Council’s LDP Proposals Map shows that the site comprises unallocated land located within the Settlement Boundary of Port Talbot.

5.21 The following LDP policies are considered relevant in the context of the proposed development:

Policy Reference	Relating to
<i>Overarching Policies</i>	
SP1	Climate Change
SP2	Health
SC1	Settlement Limits
SP3	Sustainable Communities
<i>Area Based Policies</i>	
SRA2	Harbourside Strategic Regeneration Area
<i>The Economy</i>	
SP11	Employment Growth
EC1	Employment Allocations
<i>Environment and Resources</i>	
SP15	Biodiversity and Geodiversity
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
SP16	Environmental Protection
EN8	Pollution and Land Stability
SP18	Renewable and Low Carbon Energy
RE1	Criteria for the Assessment of Renewable and Low Carbon Energy Development
SP19	Waste Management
W1	Waste Management in New Development
<i>Transport and Access</i>	
SP20	Transport Network
TR2	Design and Access of New Development
<i>Culture and Heritage</i>	
SP21	Built Environment and Historic Heritage
BE1	Design

National Policy and Guidance

Planning Policy Wales Edition 12

- 5.22 Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.
- 5.23 Sustainable Development is defined at Page 7 of PPW as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*.
- 5.24 Paragraph 1.18 sets out that *"Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated"*.

Placemaking

- 5.25 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example states that *"Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities"*.

5.26 It is summarised succinctly at Paragraph 2.3 that *"The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all"*.

5.27 Placemaking is defined at Page 14 of PPW as follows:

"Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well being in the widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings".

5.28 A set of 'national sustainable placemaking outcomes' are outlined on page 17 PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:

- *Growing our economy in a sustainable manner*
- *Making Best Use of Resources*
- *Facilitating Accessible and Healthy Environments*
- *Creating & sustaining communities*
- *Maximising environmental protection and limiting environmental impact*

5.29 It is highlighted at Paragraph 2.20 that *"Not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being"*.

5.30 The implications of COVID are highlighted in Paragraph 2.22, stating for example that *"We must ensure that a post-Covid world has people's well-being at its heart. Planning Policy Wales leads the way in this respect and contains the principles and policies needed for us to recover from this situation in a positive manner. In July 2020 the Welsh Government published Building Better Places⁹ which pinpoints the most relevant policy priorities and actions to aid in the recovery"*.

5.31 Paragraph 2.23 confirms that *"Building Better Places recognises the pivotal role that planners play in shaping our society for the future. They must plan for our priorities around placemaking, decarbonisation and well-being. Building Better Places starts to identify action to achieve this and upon which we must build; future reviews of Planning Policy Wales will enable us to further integrate this work. Everyone has a part to play to ensure that the communities of tomorrow benefit from the foresight of today"*.

Good Design

5.32 The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW where it is stated that *"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area"*.

5.33 Good design must enable development proposals to address the issues of inclusivity and accessibility for all, and it is highlighted at Paragraph 3.6 that *"This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young*

children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport”.

- 5.34 In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals - Paragraph 3.7 states for example that *“Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution”.*

- 5.35 The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8:

“Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places”.

- 5.36 Paragraph 3.12 outlines that good design is also about avoiding the creation of car-based developments by 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 is stated that *“Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate”.*

Welsh Language

- 5.37 It is set out in PPW that the Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. Paragraph 3.29 states that *“If required, language impact assessments may be carried out in respect of large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language”.*

Sustainable Transport

- 5.38 PPW advises at Paragraph 4.1.10 that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:

- *“are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling”.*

- 5.39 Paragraph 4.1.11 summarises that: *“Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services”.*

- 5.40 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles.

Paragraph 4.1.13 sets out that *"The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport"*.

Active Travel

- 5.41 The importance of developing local active travel networks to help mitigate the impact of new development by providing an alternative mode of travel to the private car is highlighted in PPW. It is stated at Paragraph 4.1.30 that *"Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice"*.

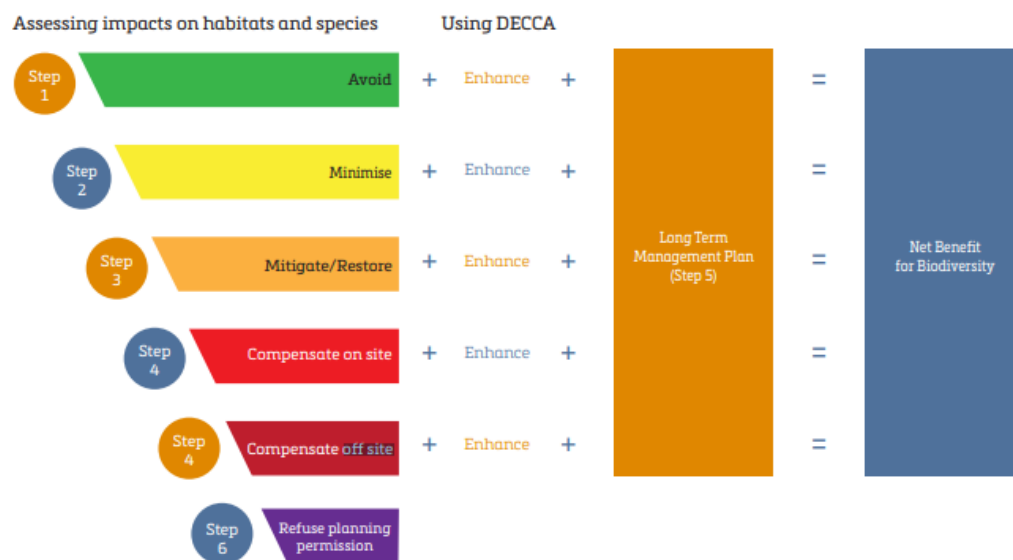
Public Transport

- 5.42 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this *"by locating development where there is, or can be, good access by public transport"*.

Green Infrastructure

- 5.43 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.11 that *"The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes"*.
- 5.44 Paragraph 6.2.12 confirms that *"A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied"*.
- 5.45 The Step-Wise Approach is depicted at figure 12 and discussed at paragraph 6.4.15 which confirms that the first priority for planning authorities is to avoid damage, if that is not possible then there is a requirement to minimise, mitigate, compensate on site, and then only as a last resort off-site compensation for unavoidable damage must be provided.

Figure 12: Summary of the Step-Wise Approach



Sustainable Drainage Systems (SuDS)

- 5.46 The importance of considering SuDS as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *"The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development"*. It is advised at Paragraph 6.6.19 that *"Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified"*.

Technical Advice Notes

- 5.47 The following Technical Advice Notes (TANS) are of relevance to the proposed development:
- 5.48 TAN 11 Noise (1997): provides advice on how the planning system can be used to minimise impact of noise without placing unreasonable restrictions on development. It outlines some of the main considerations which local planning authorities should take into account in drawing up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.
- 5.49 TAN 12 Design (2016): provides advice on design considerations and states that development should aim to:
- *Create places with the needs of people in mind, which are distinctive and respect local character*
 - *Promote layouts and design features which encourage community safety and accessibility*
 - *Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles*
 - *Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building*
 - *Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards*
 - *Secures the most efficient use of land including appropriate densities*
 - *Consider and balance potential conflicts between these criteria*
- 5.50 TAN 18 Transport (2007) confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new

development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.

Local Planning Authority Supplementary Planning Guidance

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

- SPG: Biodiversity and Geodiversity
- SPG: Pollution
- SPG: Renewable & Low Carbon Energy
- SPG: Parking Standards
- SPG: Design

Appraisal

Overview

- 6.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.
- 6.2 The key material planning considerations are as follows:
- The principle of development
 - The Impact on Residential Amenity
 - The Impact of Noise
 - The Impact on Transport
 - Biodiversity, Ecology and Green Infrastructure
 - Other material considerations

The Principle of Development

- 6.3 The proposals involve the demolition of the existing school and its redevelopment with a modern, 21st-century educational facility. The site is located within the defined settlement boundary and is currently in active educational use. The existing community facilities within the school will be retained and integrated into the new development, ensuring continuity of provision. As such, the principle of a replacement school on this site is well established and fully justified.
- 6.4 The proposals are fully compliant with national and local planning policy, including Planning Policy Wales (PPW), Future Wales: The National Plan 2040, and the Neath Port Talbot County Borough Council (NPTCBC) Local Development Plan (LDP). Specifically, the development aligns with Policy SC1 (Settlement Limits), which directs development to established settlements, and Policy SP3 (Sustainable Communities), which promotes well-designed, accessible, and resilient community infrastructure.

The Impact on Residential Amenity

- 6.5 The proposed development replaces the existing operational school with a modernised facility, retaining its current educational and community function. As such, many of the impacts on adjoining properties will remain unchanged, including those associated with play facilities, school activity, and operational hours. The existing Multi-Use Games Area (MUGA) is located along the south-eastern boundary, while the grass sports pitch sits towards the south-western boundary. These established uses will be retained within the new layout, ensuring continuity in their placement and function. Additionally, the proposed sports pitch will not be available for community use outside of school hours, thereby limiting any potential increase in noise or disturbance for nearby residents.
- 6.6 The sports pitch will be enclosed by a 7.4m high ball stop fence, ensuring adequate containment of activities. This fencing will run along the shared boundary with existing residential properties fronting Marine Drive and Marine Close, whose rear gardens directly back onto the site. The south-eastern boundary of the site is currently formed by a 2.4m-high fence, which will remain as part of the boundary treatment strategy. These measures provide both security and screening, minimising any potential impacts on neighbouring properties.

- 6.7 The proposed school building has been positioned away from the site boundaries, creating a buffer zone between the development and adjoining residential properties. This ensures that existing spatial relationships remain largely unchanged, reducing any potential impacts on residential amenity. The western, southern, and eastern boundaries benefit from natural separation, with additional soft landscaping and rain gardens incorporated into the site layout to enhance screening and biodiversity. Given that the site will remain in educational use, the overall impact on neighbours is expected to be minimal. Noise considerations are addressed separately below.
- 6.8 The proposals are fully compliant with National Policy, the National Development Framework, and the Neath Port Talbot County Borough Council (NPTCBC) Local Development Plan. The scheme aligns with Policy BE1 (Design) by ensuring that the site layout, scale, and boundary treatments respect the existing urban context while enhancing functionality and sustainability. The design also adheres to relevant Supplementary Planning Guidance (SPG), ensuring that the school provides a high-quality, well-integrated, and appropriately mitigated environment for both users and the surrounding community.

The Impact of Noise

- 6.9 Formant Ltd has undertaken a Baseline Noise Survey and Noise Impact Assessment for the proposed redevelopment of Ysgol Gynradd Gymraeg Rhosafan. The report summarises the results of environmental noise monitoring conducted in March 2024 and evaluates the potential impact of the new development. The site is located within a predominantly residential area, away from any significant sources of transportation, commercial, or industrial noise. Consequently, environmental noise impacts on the proposed school are expected to be minimal. However, it will be important to consider the potential noise impact of new mechanical services plant on nearby Noise Sensitive Receptors (NSRs).
- 6.10 The soundscape at the existing school is primarily influenced by natural noise sources, with the assessment confirming that noise was dominated by wind and sea sounds from the southwest. The site is located approximately 150m from Aberavon Beach, where relatively high wind speeds are common, making wind and wave noise the most typical audible elements. Notably, traffic noise was not detected during the survey, reinforcing the conclusion that man-made environmental noise is low.
- 6.11 Noise measurements taken at the location of the proposed school buildings recorded an ambient daytime noise level of approximately 47 dB LAeq,T, which is below the BB93 limits for natural ventilation. As a result, all ventilation strategy options—including natural ventilation—are considered acoustically suitable for the development.
- 6.12 In summary, the site is exposed to low environmental noise levels, and no significant noise impacts are anticipated for the school. The existing acoustic environment is dominated by natural elements, and noise levels fall within acceptable limits for an educational setting.
- 6.13 While specific mechanical plant selections have not yet been finalised, noise emissions limits have been established in accordance with BS 4142 and BREEAM Pol 5 compliance requirements. For BREEAM Pol 5 certification, the rating sound level limits at nearby residential properties must be 5 dB below background noise levels, which equates to 38 dB LA,r during the day and 33 dB LA,r at night. If the BREEAM limits cannot be met, noise levels equal to the background sound levels would still be considered a 'low impact' under BS 4142 and therefore acceptable.
- 6.14 The proposed noise limits are considered achievable using standard plant and attenuation measures. The assessment indicates that mechanical plant noise emissions will remain within acceptable levels, and no significant impacts are anticipated.

- 6.15 With regard to operational noise, the redevelopment will not introduce any new noise-generating activities beyond those associated with the existing school use. The nature and intensity of school-related noise—such as pupil activities and break times—will remain broadly unchanged. Importantly, there is no planned out-of-hours community use of the sports and play facilities, further ensuring that noise impacts on adjoining residential properties will be negligible.
- 6.16 The proposals fully comply with national and local planning policies, including Planning Policy Wales (PPW), Future Wales: The National Plan 2040, and the Neath Port Talbot County Borough Council (NPTCBC) Local Development Plan (LDP). Specifically, the development aligns with Policy EN8 (Pollution and Land Stability), which seeks to minimise noise pollution and protect sensitive receptors, as well as relevant Supplementary Planning Guidance (SPG) related to environmental protection and design quality

The Impact on Transport

- 6.17 The accompanying Transport Assessment provides a comprehensive review of existing conditions, site accessibility, development proposals, trip generation, and impact assessment, demonstrating compliance with Policy TR 2 of the Neath Port Talbot Local Development Plan.
- 6.18 The site is located within the Sandfields residential area of Port Talbot, near Aberavon Beach. The existing school accommodates 406 pupils, with the Tir Morfa Centre providing additional adult learning and childcare services. The surrounding road network is predominantly residential, subject to a 20 mph speed limit, with various traffic-calming measures in place.
- 6.19 A review of accident data from 2019-2023 confirms that the area has a strong road safety record, with only one slight collision recorded, none of which involved pedestrians or cyclists. Traffic surveys undertaken in June 2024 identified peak congestion periods between 08:00-09:00 and 15:00-16:00, aligning with school drop-off and pick-up times. The development has been designed to ensure that these movements do not adversely affect the local highway network.
- 6.20 The proposal supports sustainable transport objectives, ensuring accessibility by a range of travel modes. The site benefits from good active travel infrastructure, including pedestrian footpaths, designated crossing points, and access to National Cycle Network Route 4. Safe walking routes to school have been identified by the local authority.
- 6.21 Public transport services are located within a short walking distance, with regular bus services connecting the site to Port Talbot Bus Station, Baglan, and Port Talbot Parkway railway stations, supporting Policy TR 2 by reducing reliance on private vehicles.
- 6.22 The redevelopment will increase school capacity to 511 pupils (plus 16 part days), including 45 nursery spaces, while integrating the remaining Tir Morfa services with 30 learners and 20 staff. A new vehicular access arrangement will introduce separate entrance and exit points on Marine Drive, improving site circulation and minimising congestion.
- 6.23 In line with Policy TR 2, the development includes 107 parking spaces, incorporating:
- Dedicated drop-off and pick-up areas, reducing on-street congestion on Marine Drive;
 - Three minibus spaces for school transport;
 - Disabled parking bays ensuring inclusive access; and
 - Secure cycle parking, encouraging active travel.
- 6.24 A 10% reduction in maximum parking provision is supported by the site's good access to public transport and active travel routes, in line with Neath Port Talbot's sustainability assessments.

- 6.25 Traffic modelling indicates that, despite the school's increased capacity, overall vehicle trips will decrease due to improved on-site parking and drop-off/pick-up areas. The new layout will remove current on-street congestion and ensure that access arrangements allow for the safe manoeuvring of service vehicles, including refuse collection and emergency services.
- 6.26 A swept path analysis was conducted to verify that the site layout accommodates the movement of a minibus, a large estate car, a refuse collection vehicle (RCV), and emergency services vehicles. The assessment confirmed that:
- The separate entrance and exit system on Marine Drive allows safe vehicle movement;
 - The internal one-way circulation system optimises traffic flow; and
 - Buses will continue to use the existing laybys, preventing conflicts within the school site.
 - To further enhance pedestrian safety, the proposal includes dropped kerbs, tactile paving, and a potential raised table crossing to facilitate safer active travel routes.
- 6.27 The proposed development is fully compliant with Policy TR 2, ensuring that: It does not compromise highway safety or create unacceptable traffic levels; It provides appropriate parking, cycling facilities, and safe service vehicle access; It is well-connected by sustainable transport and encourages walking and cycling; and A Transport Assessment and Travel Plan have been prepared to assess and mitigate potential impacts.
- 6.28 The Local Highway Authority provided comments at PAC stage confirming no objection. The comments advocate for staggered parent drop off and delivery times, EVC charging and a Travel Plan to be submitted. Each of these items is accounted for in the planning submission.
- 6.29 Overall, the redevelopment of Ysgol Gynradd Gymraeg Rhosafan supports a sustainable and efficient transport network, improving access, safety, and traffic management for the school and the wider community. The proposals therefore comply with national and local planning policy.

Biodiversity and Green Infrastructure

- 6.30 A preliminary ecological appraisal and bat survey has been completed at the site. The reports are submitted in support of this pre-application enquiry. The PEA confirmed that further bat surveys would be needed which have been completed. The bat survey found a Common Pipistrelle (*Pipistrellus pipistrellus*) was observed emerging from the school building during the second emergence survey. Common Pipistrelles are a common species of bat and are often found roosting in buildings. These types of bats are more tolerant to light disturbance than other species of bats. The school building is now a confirmed bat roost. No work that could affect the bat roost is permitted by law, without the permission from Natural Resources Wales, including any works to the roof. Direct illumination of the building is also not permitted, as this could constitute disturbance. Some simple measures that could be achieved to enhance the biodiversity of the site include the provision of integrated bat and bird boxes within any new buildings created on site. A variety of bird boxes can be used but all boxes must be placed at least 2m high from ground floor. A variety of bat boxes can be used but all boxes must be placed at least 2m high from ground floor. Bat boxes must be located at least 2m away from any external light source including windows.
- 6.31 The trees and buildings within the site have potential for use by nesting birds. Any tree or building works must be completed outside of the bird nesting season of March to August inclusive. If this is not achievable an ecologist must inspect any vegetation with the potential for birds to be present for active birds' nests prior to removal works beginning.

- 6.32 At present, the semi improved grassland within the site is fairly monotonous being flat and open. The grassland is likely to be used by school pupils for recreational purposes so must be maintained to some level. However creating a little more structural diversity to the grassland would be welcomed. Scattered tree planting to create a more parkland feel to less well used areas or tree / hedgerow planting with buffer areas of less intense mowing would help to create smaller micro-climates for flora and fauna.
- 6.33 Overall the existing site is predominantly comprised of developed areas with the school building and areas of hard standing. The areas of grassland are well managed by the school in operation and do not present a significant constraint to development. Net biodiversity benefit can be achieved through the landscape, green infrastructure and bat / bird boxes throughout the site.
- 6.34 The Arboricultural Report provided by ArbTS confirms that one category B tree will be lost as a result of the development. Removing the one moderate-quality tree (B Category) can be readily mitigated by suitable compensatory tree planting on the site.
- 6.35 The Green Infrastructure (GI) Strategy for the redevelopment of Ysgol Gynradd Gymraeg Rhosafan fully aligns with the objectives of Policy BE 1: Design, ensuring a high-quality, sustainable development that enhances the natural, historic, and built environment. The proposed scheme has been designed to maximise biodiversity, improve sustainability, and create an attractive, functional space for both pupils and the wider community.
- 6.36 The design complements and enhances the character and appearance of the site by integrating coastal-adapted planting, which responds to the local environment and climatic conditions. The introduction of tree buffer zones, wildflower meadows, and rain gardens will improve the visual and ecological quality of the site, ensuring that it sits harmoniously within the surrounding landscape. The use of soft and hard landscaping features, such as the Winter Gardens, forest school, and boardwalk pathways, further supports the creation of a natural, inviting setting that respects the site's context.
- 6.37 In response to the local landscape and topography, the scheme has been designed to mitigate the challenges of an exposed coastal location while enhancing biodiversity connectivity. The planting strategy includes native tree species and coastal meadow planting, ensuring resilience to wind, salt, and dry soil conditions. The development also acknowledges the wider green infrastructure network, with the site sitting within a B-Lines pollinator corridor, which will be strengthened through butterfly bunding, wildflower habitats, and tree planting. These interventions will contribute to regional biodiversity and ecological resilience.
- 6.38 The proposal makes use of high-quality, appropriate materials to enhance both the built and natural environment. The hard landscaping elements, including permeable pathways and natural timber structures, have been carefully selected to integrate seamlessly with the site's ecological and educational functions. The soft landscaping strategy prioritises habitat creation, with elements such as rain gardens, sensory planting, and woodland flora enhancing the site's ecological value while providing educational opportunities.
- 6.39 A key objective of the GI Strategy is to retain and enhance important green features, responding to the historical lack of ecological diversity on-site. The scheme significantly improves habitat connectivity by introducing new green corridors, pollinator-friendly planting, and native woodland. This will provide long-term benefits to wildlife, particularly supporting pollinators and bird species. The incorporation of outdoor classrooms, growing beds, and sensory gardens ensures that green spaces serve multiple functions, supporting both biodiversity and education.

- 6.40 The proposed Winter Gardens and outdoor learning areas create a safe, attractive environment, designed in accordance with 'Secured by Design' principles. These spaces are well-lit, visible, and naturally supervised, ensuring a secure setting for students and staff. The use of natural materials, seating clusters, and sensory planting creates a calming, engaging atmosphere, enhancing the overall learning experience.
- 6.41 Sustainability is embedded within the design, ensuring that land and resources are used efficiently. The site layout prioritises green infrastructure over hardstanding areas, maximising ecological value while providing functional outdoor learning and recreational spaces. The incorporation of SuDS (Sustainable Drainage Systems), including rain gardens, bioretention areas, and permeable surfaces, will effectively manage surface water runoff, limit flood risks, and prevent pollution, in full compliance with Policy BE 1's drainage requirements.
- 6.42 Finally, the development achieves inclusive design, ensuring that all users can access and benefit from the site's green infrastructure. The provision of accessible pathways, sensory gardens, and barrier-free learning spaces ensures that the school is welcoming and functional for all abilities. These features create a highly inclusive environment, reinforcing the educational, recreational, and ecological value of the site.
- 6.43 In summary, the Green Infrastructure Strategy for Ysgol Gynradd Gymraeg Rhosafan fully meets the requirements of Policy BE 1, ensuring a high-quality, sustainable, and well-integrated development. The proposal will deliver long-term benefits for biodiversity, climate resilience, and community well-being, creating an attractive, functional, and environmentally responsible school environment. The proposals are compliant with National Policy, the National Development Framework and NPTCBC Local Development Plan policies including TR2 (Design and Access of New Development) and Supplementary Planning Guidance's.

Other materials considerations

Energy

- 6.44 An Energy and Sustainability Statement has been provided to meet policy RE1 (Criteria for the Assessment of Renewable and Low Carbon Energy Development). This includes following the energy hierarchy, by first looking to reduce the need for energy, then looking to ensure energy is supplied in the most efficient manner possible, and lastly the use of renewable energy sources. The proposed building is required to comply with Building Regulations Part L2 Wales criteria. Further to this, the building shall go above and beyond Part L2, by operating as 'energy positive'. In practical terms this means that the building shall export more energy to the National Grid when compared to the amount it consumes, over the course of a year.

Ground Investigation

- 6.45 A Ground Investigation Report has been prepared for the planning application. With regards to the risks to human health, laboratory testing has identified elevated concentrations of arsenic in two samples potentially associated with the anthropogenic components of the Made Ground. There are no specific screening criteria applicable for a school scenario, however the recorded concentrations are noted to exceed the screening value for a public open (residential) end use (79 µg/l) but do not exceed the screening value for a public open space (park) end use (170µg/l). From information published by the BGS it is noted that the site is in an area where high background concentrations of arsenic are anticipated and as such, it is possible that these concentrations are typical of the surrounding site area.
- 6.46 Additional samples were obtained from the vicinity of the exceedances noted above, were scheduled for bioaccessibility testing for a range of heavy metals. With regards to arsenic concentrations a maximum bioaccessible fraction of 6.9% was recorded. When this fraction is applied the exceedances noted in Phase 1, the resultant concentrations are noted to be below the screening threshold for public open space

(residential) end use. It is also noted that recorded concentrations are below the screening values for a residential with plant uptake.

- 6.47 Based on the information presented above and within the context of the proposed development, it is not considered that further assessment or risk management procedures will be considered necessary at this time.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Neath Port Talbot County Borough Council and Morgan Sindall to accompany an application for the demolition of the existing primary school and the construction of a modern, 21st-century educational facility at Rhosafan Primary School, Marine Drive, Port Talbot, SA12 7NN. The proposals include a new school building, sports pitch, play facilities, highway and access improvements, plant, and associated works, ensuring that the redevelopment meets contemporary educational and environmental standards.
- 7.2 The proposed development seeks to replace the existing operational school with a modernised facility within the defined settlement boundary, where the principle of educational use is long established. The scheme retains and enhances community facilities, ensuring continuity in provision while delivering a purpose-built, future-proofed school environment that meets modern curriculum and accessibility standards.
- 7.3 As the site is already in established educational use, the impacts on adjoining properties will largely reflect the existing situation. The redevelopment maintains the established positioning of play facilities, with the Multi-Use Games Area (MUGA) to the south-eastern boundary and the sports pitch to the south-western boundary, ensuring that the overall activity levels remain unchanged.
- 7.4 In terms of operational noise, the proposals will not result in any significant changes for neighbouring properties, as the nature of school-related activities remains consistent. While the new facilities offer improved functionality, the sports and play areas will not be available for out-of-hours community use, ensuring continued protection of residential amenity.
- 7.5 The transport impact assessment confirms a reduction in overall traffic flows within the local road network, primarily due to the significant decrease in the Tir Morfa ALN operations on-site. While the new site access will experience a forecast increase in traffic flows, the magnitude of change remains within acceptable limits, with no capacity issues arising. The scheme also promotes sustainable transport choices, with enhanced pedestrian access, cycle storage, and improved site circulation in accordance with Policy TR2 (Design and Access of New Development).
- 7.6 The proposals are supported by a comprehensive suite of Landscape Plans and a Green Infrastructure Statement, which set out biodiversity and environmental enhancements across the site. The existing school grounds, while well-maintained, present significant opportunities for ecological improvement. The Landscape Masterplan introduces extensive new planting, improved habitat connectivity, and dedicated green infrastructure features, in line with Building with Nature Standards. The Winter Garden is a key feature, providing enhanced biodiversity, educational opportunities, and a greater variety of species planting, ensuring that the development contributes to local and regional ecological networks in accordance with Policy BE1 (Design) and Policy EN8 (Pollution and Land Stability).
- 7.7 The proposals fully comply with relevant national, regional, and local planning policies, including Planning Policy Wales, the Future Wales National Plan 2040, and the Neath Port Talbot Local Development Plan. The scheme meets the design, sustainability, and transport objectives set out in Policy BE1 (Design), Policy TR2 (Transport and Accessibility), and Policy EN8 (Environmental Protection), ensuring that the development delivers high-quality, resilient, and community-focused infrastructure. Given the policy compliance, environmental enhancements, and educational benefits, it is respectfully requested that Neath Port Talbot County Borough Council grant planning permission for the proposed development.