

PLANNING STATEMENT

**LAND AT LLANGATWG
COMPREHENSIVE SCHOOL,
MAIN ROAD,
CADOXTON,
NEATH,
SA10 8DB**

July 2025



Summary

Proposal

Proposed demolition of existing comprehensive school and loss of existing sports fields, construction of new comprehensive school, modified car parking arrangement, inclusion of sports pitches and multi use games areas, lighting, landscaping and associated infrastructure works

Location

Land at Llangatwg Comprehensive School, Main Road, Cadoxton, Neath, SA10 8DB

Date

July 2025

Project Reference

24.217

Client

Neath Port Talbot County Borough Council Education Department

Product of

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Report Revision No.

Revision D

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Introduction

- 1.1 Asbri Planning is appointed as planning agent to Neath Port Talbot County Borough Council Education Department to prepare this Planning Statement to accompany the proposed demolition of existing comprehensive school and loss of existing sports fields, construction of new comprehensive school, modified car parking arrangement, inclusion of sports pitches and multi use games areas, lighting, landscaping and associated infrastructure works at land at Llangatwg Comprehensive School, Main Road, Cadoxton, Neath, SA10 8DB.
- 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 have been prepared to accompany the application:

Drawing name	Drawing reference
Site Location Plan/Existing Site Plan	26CC07-ASL-00-ZZ-D-A-0001-P5
Existing Floor Plans 1 of 5	N/A
Existing Floor Plans 2 of 5	N/A
Existing Floor Plans 3 of 5	N/A
Existing Floor Plans 4 of 5	N/A
Existing Floor Plans 5 of 5	N/A
Proposed Site Plan	26CC07-ASL-30-00-D-A-0100-P2
Demolition Site Plan	26CC07-ASL-30-00-D-A-1510-P3
Proposed Ground Floor Plan	26CC07-ASL-31-00-D-A-0101-P9
Proposed First Floor Plan	26CC07-ASL-31-01-D-A-0102-P8
Proposed Second Floor Plan	26CC07-ASL-31-02-D-A-0103-P8
Proposed Roof Plan	26CC07-ASL-31-03-D-A-0104-P5
Planning Elevations Sheet 1	26CC07-ASL-32-ZZ-D-A-0110-P3
Planning Elevations Sheet 2	26CC07-ASL-32-ZZ-D-A-0111-P3
Proposed Sections 1	26CC07-ASL-33-ZZ-D-A-0130-P5
Proposed Sections 2	26CC07-ASL-33-ZZ-D-A-0131-P4
Site Sections	26CC07-ASL-32-ZZ-D-A-0140-P2
Courtyard Close Visual	N/A
Courtyard Far Visual	N/A
LSC Entrance Visual	N/A
Main Approach Visual 1	N/A
Main Approach Visual 2	N/A
North Entrance Visual	N/A

Landscape Masterplan	26CC07-ASL-30-XX-D-L-1001-P11
Hard Landscape	26CC07-ASL-30-XX-D-L-1002-P06
Soft Landscape	26CC07-ASL-30-XX-D-L-1003-P06
Roof Terraces Landscape	26CC07-ASL-30-XX-D-L-1004-P05
Boundary Treatment	26CC07-ASL-30-XX-D-L-1005-P10
BB103 Areas	26CC07-ASL-30-XX-D-L-1007-P03
Biodiversity Enhancement	26CC07-ASL-30-XX-D-L-1008-P03
Landscape Site Sections	26CC07-ASL-30-XX-D-L-2001-P04
Service Yard Elevations	26CC07-ASL-30-XX-D-L-2002-P01
Proposed Drainage Layout Sheet 1	26CC07-CUR-52-XX-D-C-0001-P05
Proposed Drainage Layout Sheet 2	26CC07-CUR-52-XX-D-C-0002-P05
Proposed Levels Plan Sheet 1	26CC07-CUR-50-XX-D-C-0001-P04
Proposed Levels Plan Sheet 2	26CC07-CUR-50-XX-D-C-0002-P04
External LUX Plot	26CC07-TBA-55-XX-D-E-6301-P02
External Sports Pitches LUX Plot	26CC07-TBA-55-XX-D-E-6302-P01
Hydrant Tank Builders Work Layout and Details	26CC07-CFS-XX-XX-D-OH-0006-P01
Sprinkler System Water Supplies Layout	26CC07-CFS-XX-XX-D-OH-0007-P01

1.4 In addition, the following supporting documents are submitted.

Document name (reference where appropriate)	Prepared by
Planning application forms (1APP)	Asbri Planning
Covering Letter	Asbri Planning
Planning Statement	Asbri Planning
PAC Report	Asbri Planning
Design and Access Statement	Austin Smith Lord
Green Infrastructure Statement	Austin Smith Lord
Landscape Maintenance and Management Plan	Austin Smith Lord
Outline Specification	Austin Smith Lord
Drainage Strategy	Curtins
Flood Consequences Assessment	JBA Consulting
Transport Statement	Acstro
Topographic Survey	Gwalia Surveyors
Utilities Survey	Gwalia Surveyors
Preliminary Ecological Assessment	Ecological Services
Arboricultural Report	ArbTS
Phase 1 Geoenvironmental Assessment Desk Top Study	Tetra Tech
Ground Investigation and Geotechnical Design Report	Tetra Tech
Historic Building Recording	Heneb
Net Zero Carbon Report	Arda Consulting

Low Zero Carbon Study	Troup Bywaters + Anders
Luminaire Schedule	Troup Bywaters + Anders
Baseline Noise Survey Report	Formant

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 Llangatwg School is an English-medium community school located in the village of Cadoxton, just outside the town of Neath. The school currently has the capacity to accommodate 1,170 pupils, but it is operating below capacity with 770 pupils enrolled (aged 11 to 16) along with approximately 90 staff members. Llangatwg serves both the Neath and Dulais Valleys, as well as the villages of Cilfrew and Cadoxton. The majority of students access the school by bus, with eight separate services currently transporting pupils.
- 2.2 The existing site is a somewhat rectangular shaped parcel of land comprising a variety of shaped and designed school buildings on its western half and accompanying sports fields to the east. The site is centred on the following grid coordinates: E: 276688; N: 199284.
- 2.3 Buildings on the site first appeared between 1918 and 1935, with the courtyard block and caretaker's house the first to be developed. The school gym hall building is of a similar age and remains on the site. Three of the original school buildings remain and are of good architectural quality, whereas the remaining structures are of much lower quality, varying in style and condition.
- 2.4 The site is situated within a predominantly residential area, with residential properties to the south and west. To the north lies a large area of green infrastructure, comprising restored ancient woodland. To the east is Neath Coachbuilders Ltd, a company specialising in commercial vehicle servicing, repairs, and breakdown assistance across South Wales. Beyond Neath Coachbuilders are residential cul-de-sacs and Cilffriw Primary School. The site is bordered to the south by the A4240 (Main Road) and Penscynor Road, which define the site's perimeter in this direction. There is a one-way entry/exit system into the school, with the main road providing access to the site and the exit onto Penscynor Road.
- 2.5 Several bus stops lie within close proximity of the site including those along Penscynor Road and the Main Road (A4230) making it a highly sustainable location. Cilfrew and Cadoxton lie approximately a three minute drive from the site, whereas Neath is roughly a 10 minute drive away. Neath bus station lies roughly five kilometres from the site and offers services heading to several destinations including Swansea, Skewen, Margam, Pontardawe and Brecon. Neath Train Station offers hourly services are operated by Great Western Railway travel between Swansea and London Paddington in both directions. Transport for Wales services also call at the station, with their services terminating at destinations including Manchester Piccadilly, Cardiff Central, Carmarthen and Milford Haven. There are no Public Rights of Way that cross the site, although there is a Public Right of Way network within the woodland located to the north of the site, as shown in Figure 1.



Figure 1: Ordnance Survey Map (Source : Ordnance Survey)

- 2.6 The adopted TAN 15 Flood Map shown below in Figure 2 reveals that the site does not lie within a flood zone for rivers and seas. The new TAN 15 Flood Map shows that the western part of the site partially lies within flood zones 2 and 3 surface water and small watercourses as illustrated in Figure 3. A review of Google Maps confirms that there are open streams on site, and a culvert crosses the pitch diagonally, connecting to an open water feature positioned to the south of Nant y Glyn.



Figure 2 : Natural Resources Wales (NRW) Flood Map for Planning (Rivers and Seas)
(Source : NRW)

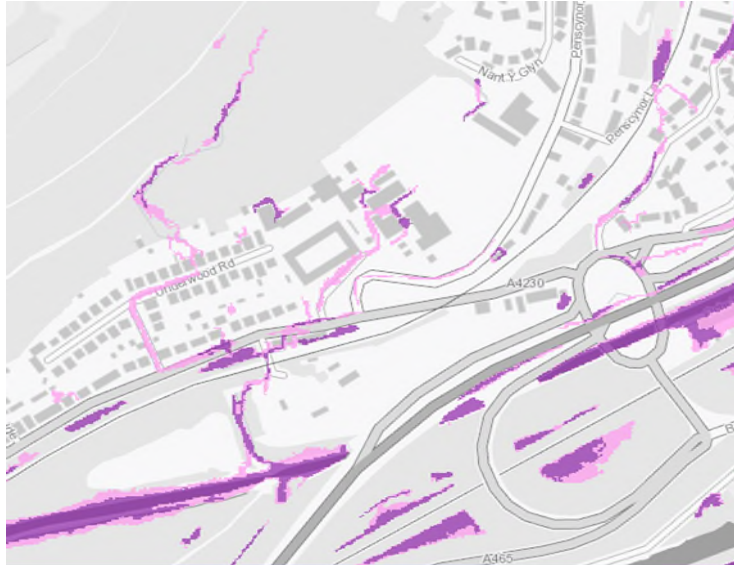


Figure 3 : NRW Flood Map for Planning (Surface Water and Small Watercourses) (Source : NRW)

2.7 A review of Historic Wales Map confirms that no listed buildings, scheduled ancient monuments, registered parks and gardens or any further heritage features lie within the immediate vicinity of the site. The Scheduled Monuments located nearest to the site are listed below:

- GM485 - Tinplate works at Aberdulais Falls
- GM505 - Canal Boat at Aberdulais Basin
- GM506 - Aberdulais Aqueduct

2.8 Figure 4 indicates the position of the nearest heritage assets to the site, with several listed building lying to the south and east of the site. No part of the site is identified as a Building of Local Importance in the relevant Supplementary Planning Guidance.

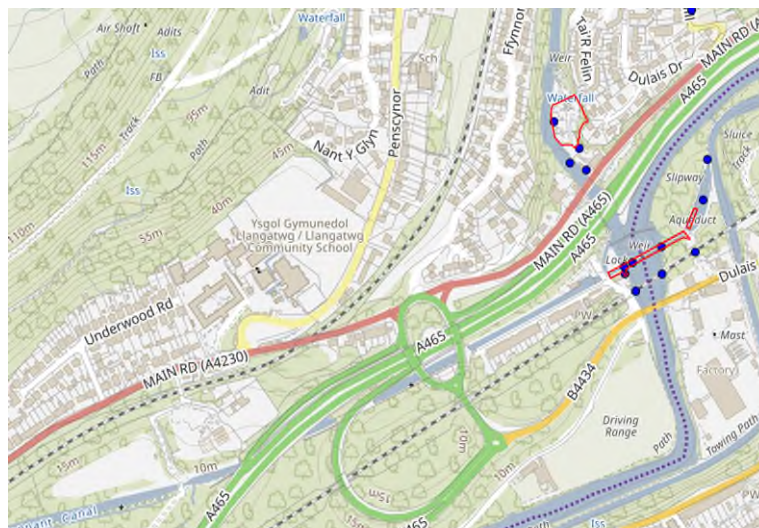


Figure 4 : Cadw Planning Map (Source : Cadw)

- 2.9 Early consultation with Heneb confirmed that there are no known archaeological sites in the proposed development area. However, a review of historic Ordnance Survey shows the first phase of the school's development (4th ed), as well as a managed waterway running northeast-southwest through the current playing fields and likely associated with a malt house immediately adjacent to the development site. An archaeological assessment does not need to be submitted with the application. .
- 2.10 The school, originally built in 1929 and opening in 1930, included a main building, a caretaker's house, and small outbuildings for 608 students. Designed by architect W. John Nash, the school expanded over time, adding a gymnasium in 1938, a canteen, and new teaching blocks in the 1960s and 1990s. The original quadrangle building, caretaker's house, and gymnasium remain standing. The quadrangle features red brick with Doultong oolite dressings, while the caretaker's house is constructed of similar materials. The gymnasium, built later, retains original features such as its floor and ceiling details, making it a valuable element of the school's historic fabric.
- 2.11 The site borders a restored ancient woodland, located to the north of the site. In addition to this, the built-up proportion of the site has a number of trees pepper potted, but more generally, trees are located around the site's periphery. A review of Datamap Wales suggests that there are no nationally designated (SACs,SSSI, SPAs) assets on the site or within close proximity.
- 2.12 The site lies within the South Wales Coal Mining Reporting Area, as indicated with the Mining Remediation Authority Interactive Map in Figure 5.



Figure 5 : Mining Remediation Authority Interactive Map (Source : Mining Remediation Authority)

- 2.13 A review of Neath Port Talbot County Borough Council's Interactive Proposals Map shown in Figure 6 reveals that the site lies within the settlement boundary, where development is considered acceptable in principle, subject to compliance with all other material planning considerations. From the map, the site is not subject to any ecological or environmental constraints or designations.

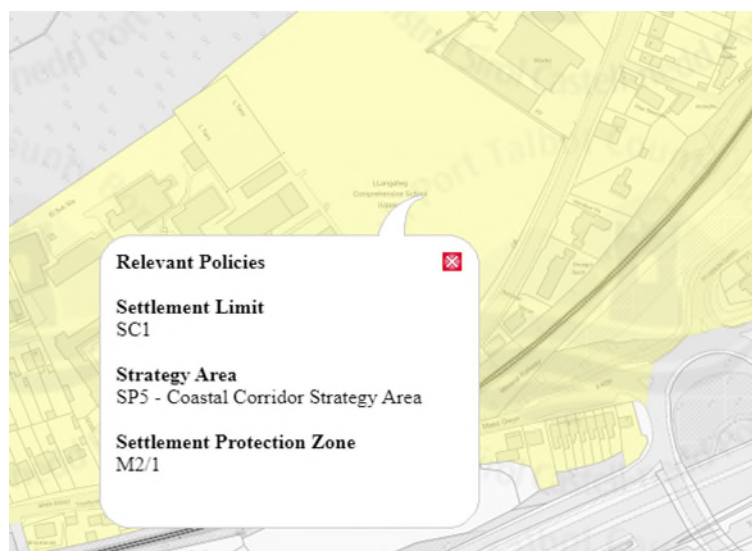


Figure 6: Neath Port Talbot Local Development Plan (2011-2026) (Adopted January 2016)
(Source: Neath Port Talbot Council)

2.14 A review of Neath Port Talbot County Borough Council's online planning archive records identifies the following planning history associated with the site. This information is provided in the below table:

Planning Reference	Proposal	Decision
P1999/0826	Attach Solar Panels To Front Of Science Block	Approved 27th August 1999
N1995/0427	Provision Of Floodlighting	Awaiting Decision
N1995/0284	Provision Of New Changing Rooms	Approved 10th July 1995
N1993/0274	Erection Of 3 No. Lighting Columns At Edge Of Rugby Pitch	Approved 23rd August 1993
N1993/0199	Single Storey Extension To Existing Craft Block	Awaiting Decision
N1981/0284	Demountable Classroom	Approved 29th April 1981
N1979/0313	Boundary Fence 1.5m	Approved 24th July 1979
N1977/0489	Science Labs	Approved 18th December 1977
N1977/0358	Proposed Science Laboratories	Approved 26th September 1977
N1976/0334	Mobile Classroom Unit	Approved 20th July 1976

2.15 The above confirms that the school has been added to on an ad hoc basis since 1976.

Proposals

- 3.1 The proposal is for the construction of a new comprehensive school, demolition of existing comprehensive school and associated infrastructure works at Llangatwg School. The new school is to be constructed within the existing school boundary, to the south east. The remainder of the site will include a variety of playing fields and parking provision for the school.
- 3.2 The new school will have a building capacity for 850 secondary school pupils, 16 additional learning need pupils and 90 full and part time staff. The proposed student capacity is 27% less than the existing capacity of 1,170.
- 3.3 The proposed school building will be C-shaped, with stepped massing up to a height of three storeys. The stepped form of the building is proposed to reduce its massing away from Pencynor Road and respect the amenity of nearby residential dwellings. External materials for the building will include red clay brickwork, metal cladding, aluminium windows and curtain walling.
- 3.4 The floor plans for the school indicate several rooms and facilities will be provided including:
- Classrooms
 - IT facilities
 - WC facilities
 - Staff rooms
 - Lab rooms
 - Sports hall
 - Conference/meeting room
 - Learning resource centre
 - Immersion room
 - Science prep room and chemical store
- 3.5 In addition to the new school building, a modified parking arrangement will be provided. Designated bus, car and taxi drop off areas will be provided, along with parking spaces which include EV and disabled provision. Bus bays are proposed along the school's access that will allow buses to manoeuvre safely within the site without blocking circulation or parking for vehicles, whilst also providing improved connectivity for students between the bus bays and school building entrances. The existing one way vehicle circulation will be retained as part of the proposal. A service yard is proposed at the eastern end of the site that will be accessed via a vehicle crossover of the Pencynor footway. The new access provides 2.4m x 45m visibility splays in both directions. The service yard contains two designated spaces for school mini-buses. Covered cycle spaces are also proposed across two shelters.
- 3.6 Towards the rear of the site a senior/rugby football pitch, three multi use game areas and a youth football pitch will be provided, not only for pupils use but also for the wider community beyond school hours. Other external features included within the proposal are a food growing area, forest school, running track, greenhouse and amphitheatre/performance space.
- 3.7 The vision for the proposal is to provide a modern school building with ample external facilities offering an exciting learning environment with flexible and adaptable facilities to meet the requirements of the new curriculum. Once the new school building has been constructed, the contractor will then demolish the existing school buildings and undertake any outstanding external works.

- 3.8 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.
- 3.9 The applicant has embraced the introduction of green infrastructure principles into this project. A joined-up approach between different disciplines including ecology, landscaping and drainage has been adopted. This has manifested itself in the incorporation of a landscaping masterplan which includes both soft and hard landscaping features.

Pre-Application Discussions

4.1 An informal meeting was held with the planning department in December 2024 during which it was confirmed that;

- Detailed information on the school's community use is required to assess the impact on noise, lighting, and parking from activities outside regular school hours.
- Emphasis was placed on addressing the impact of noise and light on nearby residents. It was suggested that public engagement occur before the PAC, involving local councillors and sensitive receptors, especially considering one councillor's interest in preserving some of the older buildings on-site.
- A baseline noise assessment was requested to evaluate the impact of noise from a nearby garage.
- Concerns were raised about the location of the ALN and whether the external space (next to a road and car park) is appropriate.
- It was confirmed that there are Tree Preservation Orders (TPOs) on land behind the nearby coachbuilders facility.
- Car parking must be carefully planned, and the potential change in catchment areas should also be considered.
- There were questions raised about the construction logistics.

4.2 On 27th February 2025, a formal pre-application was submitted to the Council under planning reference Q2025/0076. The planning officer provided their feedback via both written email and virtual meetings, with some of the key points have been noted below which have been addressed prior to full application submission:

Biodiversity

- Details of biodiversity enhancement measures are required
- A Green Infrastructure Statement must clearly show how the step wise approach has been adhered to.
- Any tree to be removed will require to be replaced with 3 trees of a similar type and size for each one lost
- The use of synthetic grass is not supported and requested its removal from the scheme

Environmental Health

- Noise Impact Assessment will need to include noise from any mechanical plant and ventilation proposed, including air source heat pumps if included.
- A Lighting Impact Assessment Report describing the external lighting strategy for the proposed development and an assessment of the anticipated effects including details of the lighting design criteria is required.
- Details of the luminaire specifications should be provided with details of their parameters.
- An assessment of the noise generated from the balcony and courtyard is required.

Highways and Active Travel

- A drawing is required showing visibility splays on all access points in accordance with Manual for Streets

- Clarification required on the barrier system shown on the Car Park Access plan within the Transport Statement
- Clarification required whether the paths around the car park are flush or if there will be a kerb or bollards
- The two main pedestrian entrances would benefit from a raised plateau in accordance with Active Travel Guidance
- Several active travel improvements suggested with signalised crossing point on the A4230 outside the school being a priority

Flood Risk and Drainage

- SAB approval required
- Flood Consequences Assessment required given that the site lies within flood zones 2 and 3 in the adopted NRW Flood Map for Planning

Design

- Concerns raised about the block design and impact of the proposal on residential amenity.
- Requested that entrance to the site is more prominent from a wayfinding perspective

Community Use

- Updated community statement required which references use of music played within sports hall
- Clarification sought about management of outdoor facilities

4.3 Overall, the main concerns related to design, lighting, noise and the community use associated with the proposal. A follow up meeting was arranged with the LPA on 1st May 2025 following their initial comments to run through more detailed drawings prepared by project architects Austin Smith Lord, with particular focus on the western elevation of the school building.

4.4 A statutory PAC has been undertaken in accordance with Town and Country Planning (Development Management Procedure) (Wales) Order 2012, which took place between 16th May and 13th June 2025. The findings of the PAC can be found within the submitted PAC Report. During the PAC period, a public engagement event was held at Llangatwg School on 5th June 2025.

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;
 - Neath Port Talbot County Borough Council Supplementary Planning Guidance

The Development Plan

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

National Development Framework: Future Wales – The National Plan 2040

- 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.

Flooding

- 5.15 Policy 8 of Future Wales is of importance in regards to flood risk which states the below:

Policy 8 - Flooding

Flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority. Opportunities for multiple social, economic and environmental benefits must be maximised when investing in flood risk management infrastructure. It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.

Biodiversity and Green Infrastructure

- 5.16 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).*
- 5.17 In addition to this, the associated importance of green infrastructure is highlighted on page 78:

“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”.

- 5.18 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

- 5.19 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).*

- 5.20 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

- 5.21 The Neath Port Talbot County Borough Council Local Development Plan was adopted in January 2016 and comprises part of the prevailing development plan for the area. A review of Neath Port Talbot Council’s LDP Proposals Map shows that the site lies within the settlement boundary, where development is considered acceptable in principle, subject to compliance with all other material planning considerations. From the map, the site is not subject to any ecological or environmental constraints or designations.
- 5.22 The following LDP policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
SP1	Climate Change
SP2	Health
SP3	Sustainable Communities
SP4	Infrastructure
SP15	Biodiversity and Geodiversity
SP16	Environmental Protection
SP18	Renewable and Low Carbon Energy
SP19	Waste Management
SP20	Transport Network
SP21	Built Environment and Historic Heritage
SC1	Settlement Limits
I1	Infrastructure Requirements
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
EN8	Pollution and Land Stability
M2	Surface Coal Operations
RE2	Renewable and Low Carbon Energy in New Development
W3	Waste Management in New Development
TR2	Design and Access of New Development
BE1	Design

National Policy and Guidance

Planning Policy Wales Edition 12

- 5.23 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.
- 5.24 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"*.
- 5.25 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

- 5.26 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"*.
- 5.27 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"*.
- 5.28 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"*.
- 5.29 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*
- 5.30 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"*.
- 5.31 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”.

- 5.32 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

- 5.33 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”.*
- 5.34 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”.*
- 5.35 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”.*
- 5.36 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”.*
- 5.37 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”.*

Sustainability

- 5.38 It is highlighted at Paragraph 3.50 that *“planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community*

facilities (including libraries, schools, doctor's surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport."

Sustainable Transport

- 5.39 Paragraph 4.1.7 reveals that *"The Welsh Government is committed to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Delivering this objective will make an important contribution to decarbonisation, improving air quality, increasing physical activity, improving the health of the nation and realising the goals of the Well-being of Future Generations Act"*.
- 5.40 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"*.
- 5.41 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"*.
- 5.42 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

- 5.43 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

- 5.44 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"*.

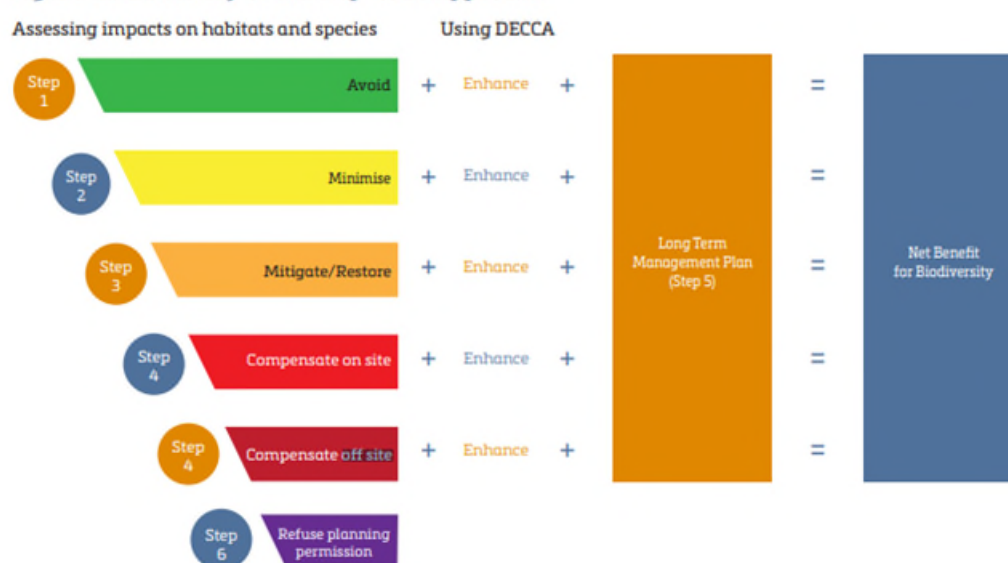
Community Facilities

- 5.45 Paragraph 4.4 states *"Community facilities perform various functions which cover a broad range of activities and services that can be delivered by the public, private and third sectors. Community facilities contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places. They can include schools, cultural facilities, health services, libraries, allotments and places of worship"*.

Green Infrastructure

- 5.46 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"*.
- 5.47 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"*.
- 5.48 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) and Flooding

- 5.49 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"*.
- 5.50 Paragraph 6.6.22 states *"The climate emergency is likely to increase the risk of flooding as a result of sea-level rises, increased storminess and more intense rainfall. Flooding as a hazard involves the consideration of the potential consequences of flooding, as well as the likelihood of an event occurring. Planning authorities should adopt a precautionary approach of positive avoidance of development in*

areas of flooding from the sea or from rivers. Surface water flooding will affect choice of location and the layout and design of schemes and these factors should be considered at an early stage in formulating development proposals".

- 5.51 Paragraph 6.6.25 notes *"Development should reduce, and must not increase, flood risk arising from river and/or coastal flooding on and off the development site itself. The priority should be to protect the undeveloped or unobstructed floodplain from development and to prevent the cumulative effects of incremental development"*.

Technical Advice Notes

- 5.52 The following Technical Advice Notes (TANS) are of relevance to the proposed development:
- 5.53 TAN 5 Nature Conservation and Planning (2009) provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.
- 5.54 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.
- 5.55 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*
- 5.56 TAN 15 Development, Flooding and Coastal Erosion (2021) offers technical guidance which supplements the policies set out in PPW in relation to flooding and coastal erosion. It provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. It also offers advice on the consequences on flood risk and the impact of living with it.
- 5.57 TAN 16 Sport, Recreation and Open Space (2009) advises on the role of the planning system in making provision for sport and recreational facilities and informal open spaces, as well as protecting existing facilities and open spaces in urban and rural areas in Wales.
- 5.58 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

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

- Renewable and Low Carbon Energy SPG (July 2017);
- Parking Standards SPG (October 2016);
- Pollution (October 2016);
- Design SPG (July 2017); and
- Biodiversity and Geodiversity (May 2018)

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:
- Principle of Development;
 - Design;
 - Community Use of Facilities Statement;
 - Highways, Access and Parking; and
 - Biodiversity
 - Drainage and Flood Risk
 - Other Material Considerations

Principle of Development

- 6.3 The proposal concerns the construction of new comprehensive school, demolition of existing comprehensive school and associated infrastructure works at land at Llangatwg Comprehensive School, Main Road, Cadoxton, Neath, SA10 8DB. Within the adopted Local Development Plan, the site is categorised as white land within settlement limits (Policy SC1 - Settlement Limits). The site is currently occupied by Llangatwg Community School and as such, the principle of developing a new school on this site from a use class perspective is established.
- 6.4 Redeveloping the school on the existing site represents a form of sustainable development, retaining it in a location that is well-connected to nearby facilities and can be conveniently accessed via public transport. Planning Policy Wales (Edition 12) outlines that previously developed land (brownfield land) should, wherever possible, be used in preference to greenfield sites where it is suitable for development. Previously developed land (brownfield land) is defined as land that *"is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure."*
- 6.5 The proposal aims to offer more local education to pupils with additional learning needs within the local education authority. To ensure minimum disruption, the existing school and community facilities will remain operational until the replacement premises are finished whilst the new school is under construction. In addition to providing an improved learning experience for students, it will also offer enhanced access to facilities for use by the community outside of school opening hours.
- 6.6 It is acknowledged that three of the existing school buildings are of architectural merit, with the main courtyard building, caretaker's house, and gym hall are constructed with red brick and stone details, featuring prominent chimneys and slate roofs. None of the buildings are listed. Following a review by NPTCBC's Education and Property teams, it was decided to demolish all existing buildings and construct a new school on the playing fields in phases. Key reasons for this decision include:
- Non-compliance with BB98 standards – Existing classrooms and gym hall are significantly undersized, leading to inefficient timetabling and limited use.
 - Structural limitations – The rigid layout makes it difficult to create compliant classrooms without compromising architectural character.

- Thermal performance challenges – Upgrading insulation without eroding heritage features is difficult.
- Accessibility issues – No lift provision in some buildings, with limited space for installing them.
- Site constraints – Keeping the school operational during renovation is impractical and costly.
- Inefficiencies in pupil management – The spread-out layout causes supervision and truancy issues.
- Renovation costs – High costs for balancing energy efficiency, building condition, and architectural preservation.
- Building fabric performance – The existing façade and roof require significant refurbishment to meet energy standards.
- Heating system replacement – Existing systems are incompatible with air source heat pumps (ASHPs), requiring a full replacement.
- Hot water system limitations – Current systems lack the capacity to support ASHPs, requiring additional plant space.
- Ventilation constraints – Ceiling voids are too low to accommodate necessary mechanical ventilation heat recovery (MVHR) systems.
- Air handling unit (AHU) placement – No viable space for AHUs without major structural alterations.
- Renewable energy challenges – Limited roof space for PV panels, with shading issues reducing efficiency. Car park space is insufficient for additional solar installations.

6.7 Given the above constraints, the construction of a new, purpose-built school is considered the most practical and cost-effective solution to meet modern educational and energy efficiency standards. As requested by Heneb, a Level 2 building survey has been completed as a form of mitigation for the proposed loss of the buildings.

6.8 To summarise, the principle of development is considered to be acceptable, and the proposal makes efficient use of land within settlement limits. The proposals are compliant with National Policy, the National Development Framework and NPTCBC Local Development Plan policies including SC1 (Settlement Limits) and SP3 (Sustainable Communities).

Design

6.9 As illustrated in the Design and Access Statement produced by Austin Smith Lord, design has been at the forefront of the proposal. The proposals are considered to be visually acceptable in design terms, representing an appropriate development within an urban area that is bordered mostly by residential dwellings. The proposed stepped C-shaped school building aims to address the key constraints associated with the site, whilst offering favourable access points for pupils, staff and community, with a discrete entrance for the LSC, secure delivery and servicing arrangements along with an improved external space.

6.10 It can be confirmed that the proposal aligns with Policy BE1 (Design), with all the following measures proposed as part of the development:

- The design of the buildings takes into consideration the existing context and surroundings;
- Locally sourced materials will be used during construction, and elements of hard and soft landscaping will be incorporated in order to incorporate the buildings into its immediate surroundings;
- There will be no detrimental impact on highway safety;
- Natural surveillance is encouraged, with clear entrances and exits provided; and
- Sustainable urban drainage systems will be incorporated into the proposal.

- 6.11 In terms of external materials, a brick plinth will be provided for the entire ground floor of the building. Elements of metallic copper colour are proposed in order to unify the building, and the colour itself will age better than feature flat colours. Glazing is proposed for key entrances in order to create visibility through the building, whereas the window design has taken into consideration the need for ventilation and daylighting whilst enhancing visual appearance. The proposal will aim to utilise locally sourced materials where possible.
- 6.12 Hard and soft landscaping features will be incorporated including feature paving, concrete slab, tree planting and amenity grass in order to create a high quality, aesthetically pleasing and biodiverse environment which can be enjoyed by pupils and staff. A range of fencing and boundary treatments are proposed that will assist with segregation, safeguarding and containment of spaces. The landscaping scheme has taken into consideration the local landscape character including its topography, micro-climate and ecology.
- 6.13 PPW Edition 12 states *"the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process and expressed, when appropriate, in a design and access statement"*. Future Wales – The National Plan 2040 echoes the above, *"irrespective of location or scale, the design and micro-siting of proposals must seek to minimise the landscape and visual impact, particularly those in close proximity to homes and tourism receptors"*.
- 6.14 It is considered that the development proposal is of high quality which responds positively to its immediate surroundings and makes efficient use of the land in question. The design, layout and orientation of proposed building and sports pitches together with the proposed landscaping offers an attractive, legible, accessible and safe environment. The precise layout and orientation of the development seeks to ensure that no significant adverse impacts would be caused to current levels of amenity of existing residents who live in properties surrounding the site, along with the coachbuilders which lies to the immediate east of the site. The overall relationship between the character and appearance of the surrounding area and the proposal will therefore be benefitted by the development as it provides an aesthetically pleasing design that is of a higher quality than the majority of the existing school buildings.
- 6.15 Having considered the above evidence, it is considered that the proposal subject to any suggested layout changes or landscape feedback by the Local Planning Authority is acceptable from a design perspective. The proposal is considered to be compliant with LDP Policy BE1 (Design), the Design SPG and Technical Advice Note 12 (Design).

Community Use of Facilities Statement

- 6.16 Llangatwg School is committed to supporting community engagement by providing access to its facilities outside of standard school hours. The school recognises the importance of shared spaces for educational, sporting, and recreational activities and aims to balance community access with the needs of its students and staff.
- 6.17 Based on currently available information, it is anticipated that the sports hall and pitches will be available for community use during weekday evenings from 18:00 to 22:00. At weekends, these facilities will be open from 09:00 to 20:00 on Saturdays and 09:00 to 18:00 on Sundays, allowing local clubs, teams, and organisations to benefit from the school's amenities. Additionally, the school premises will be accessible for specific activities, including revision sessions during holidays. The sports hall and pitches will host

holiday clubs for three weeks, running from 09:00 to 14:00, providing valuable recreational opportunities for young people.

- 6.18 To ensure a clean and safe environment, the facilities will undergo regular cleaning from 06:30 to 08:00 and 15:00 to 18:00, with the use of four vacuum cleaners and four buffing machines. The school remains committed to maintaining high standards for all users.
- 6.19 Llangatwg School values the positive impact of community engagement and will continue to facilitate the responsible use of its facilities while minimising any disruption to local residents.

Highways, Access and Parking

- 6.20 Several bus stops lie within close proximity of the site including those along Penscynor Road and the Main Road (A4230) making it a highly sustainable location. Parking provision at the school is to be increased from 70 to 97 spaces, consequently reducing the demand for on-street parking in areas near to the site. School buses presently accessing the site cause issues by blocking circulation for other vehicles and access to spaces within the school car park. The proposal will provide dedicated bus parking bays, adjacent to a footway offering a segregated pedestrian route to and from the school. The bus bays are positioned away from vehicle circulation routes and are segregated from the car parking area which allows for safe movement of all vehicles. A new service yard at the eastern end of the site will offer a secure and segregated space for commercial vehicle movements. This will be served via a new access from Penscynor Road that is considered acceptable in relation to highway design standards.
- 6.21 The site is served by an acceptable access; an appropriate level of parking provision and the traffic generated by the proposal will have no detrimental impact on highway conditions as stated in the submitted Transport Statement. The development is considered to comply with LDP Policies SP20 (Transport Network) and TR2 (Design and Access of New Development), along with the Parking Standards SPG and TAN 18 (Transport).

Biodiversity

- 6.22 An Arboricultural Report has been produced by ArbTS that includes Tree Survey Data, a Tree Constraints Plan, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement. There are a total of 39 trees on site which consist of 3 Category A tree, 9 Category B trees, 21 Category C trees and 6 Category U trees. To facilitate the development, 13 individual trees, 2 small tree groups and part of 1 tree group will need to be removed; giving a total of 24 trees to be removed. 21 of the trees proposed for removal are Category C, whereas 3 are Category B. Only Category C trees are deemed to be a constraint to developing the site. The removal of the moderate-quality trees can be mitigated by suitable compensatory tree planting and surrounding practical woodland management. It is proposed to remove 5 Category U trees and Tree Group G3 due to their poor condition. The Tree Protection Plan has been provided to illustrate how to facilitate construction of the development.
- 6.23 The Preliminary Ecological Appraisal confirms that the site consists of permanent and temporary school buildings (portacabins), sports pitches, car parks, access road, and associated landscaping within, and around the edge of the site. Recommendations and mitigation are provided for the loss of habitat, along with recommended surveys/works which include bat transect surveys, refugia survey and pre-works inspection for dormice. The report acknowledges that the site contains an array of green infrastructure, and offers good habitat connectivity to the wider landscape. Biodiversity enhancements recommended within the report have informed the Green Infrastructure Statement. Bat surveys of the site have been conducted by NPT and will accompany the planning application.

- 6.24 A Green Infrastructure Statement is provided confirming that the development demonstrates net benefit for biodiversity and has followed the stepwise approach set out in Chapter 6 of Planning Policy Wales Edition 12. The implementation of the landscape design will result in a network of healthy and multifunctional green spaces providing a range of environmental benefits for wildlife and people. Biodiversity enhancements proposed within the report include the introduction of raingardens, creation of open water channel offering opportunities for new habitat creation, the planting of additional stretches of hedgerow utilising locally-sourced materials and hedgehog friendly fencing across the site. A Landscape Management and Maintenance Plan outlines the strategies and procedures for the upkeep and preservation of the proposed landscaping scheme.
- 6.25 In summary, the proposal accords with LDP Policies SP15 (Biodiversity and Geodiversity) and EN7 (Important Natural Features), the Biodiversity and Geodiversity Supplementary Planning Guidance, along with Technical Advice Note 5 (Nature Conservation and Planning).

Drainage and Flood Risk

- 6.26 In terms of surface water drainage, the proposal will be SuDS compliant, with discharge locations considered in respect of the SuDS hierarchy and the four pillars of SuDS design. The proposal will lead to an increase in positively-drained surface water catchment in comparison with the existing site. The proposed positively-drained catchment area results in an increase of 58% when compared to the existing site area. Surface water runoff from the new development is to be restricted to the existing 2-year brownfield rate, with a 30% betterment being applicable. This discharge rate is applicable to all storms up to the critical 100 year return period design storm. With an overall drained catchment of 3.45 hectares, the restricted flow rate is 230 l/s for the application site.
- 6.27 The drainage design will aim to direct runoff to a green SuDS feature in order to maximise interception and treatment via natural biological processes. The drainage scheme includes run off from roofs, roads, and parking/delivery areas that shall be captured within bioretention areas and swales which will offer substantial treatment for the catchments. In terms of surface water amenity and biodiversity, these benefits shall be delivered by distributing green SuDS features across the application site. Vegetation within SuDS features will offer visual interest and habitat for wildlife. Furthermore, an attenuation basin is proposed with a boardwalk offering raised access to the densely-planted part of the site.
- 6.28 In terms of foul water drainage, foul flows will be conveyed to the combined sewer via gravity. Discussions with Welsh Water have confirmed that the combined sewer and nearby wastewater treatment works have the ability to accommodate the foul flows from the proposal. As a result of the existing combined sewer passing through the site, a diversion agreement is requirement to divert the sewer from the southeast of the site, via the proposed parking area heading west and reconnecting the existing sewer in the southwestern area of the site prior to continuing downstream.
- 6.29 The whole site lies within Flood Zone 1 for Rivers and Seas. The site is predominantly within Flood Zone 1 of the Flood Map for Planning for Surface Water and Small Watercourses, however parts of the site are situated in Flood Zones 2 and 3 of the Flood Map for Planning for Surface Water and Small Watercourses. Areas shown to be at risk of flooding include areas of open channel of the unnamed watercourse in the northern portion of the site in addition to the area of open channel within the existing school site.
- 6.30 An assessment of the flood risk mechanisms revealed that the area upstream of the unnamed ordinary watercourse by the coachbuilders facility poses the biggest risk of flooding to the development site as a result of the risk of blockage of the culvert. In order to minimise the risk of flooding occurring from the culvert blockage the following measures are recommended within the submitted Flood Consequences Assessment (FCA):

- The open section of channel immediately upstream of Inlet 2 should be cleared and secured so far as possible to prevent unauthorised access and the accumulation of debris.
 - Consideration should be given to the requirement and possible removal of the security screen at Inlet 2 and its corresponding outlet. The risk of unauthorised access to be managed by other means.
 - A management and maintenance plan should be implemented to ensure the watercourses and screens are regularly checked and cleared to reduce the risk of blockage.
 - So far as practical the new school building should be raised above surrounding ground levels to direct any exceedance flow around the building.
- 6.31 The above measures will be implemented as part of the development in order to reduce the flood risk associated with the site. The FCA concludes that in respect of flood risk, the proposal is acceptable and satisfies both Technical Advice Note 15 and the aims of Planning Policy Wales Edition 12.
- 6.32 Having considered the above, the proposal aligns with the following point of Policy BE1 (Design): “9. *Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution*”. Sustainable Urban Drainage Systems are being implemented as part of the scheme, which is advised as part of the policy under paragraph 5.5.13 of the LDP. In terms of flood risk, the risk associated with development is not considered to be unacceptable. As a result of this, the proposal complies with Planning Policy Wales and Technical Advice Note 15 (Development and Flood Risk).

Other Material Considerations

Noise and Lighting

- 6.33 In terms of noise impact arising from the school, the noise emissions limits have been set 5Db below the representative background levels in accordance with BREEAM/BS 4142. An initial review of the proposed air source heat pump noise indicates that the proposed noise limits can be achieved with the implementation of plant and attenuation measures, resulting in no substantial impact as a result of plant noise emissions. Moreover, the implementation of a noise barrier along the end of the proposed sports pitch will result in no significant noise impacts upon nearby residential dwellings.
- 6.34 An external lighting scheme for both the school and sports pitches has been designed by Troup Bywaters + Anders. It has been designed to take into consideration the surrounding residential context and has also been influenced by feedback from the project ecologist.
- 6.35 In summary, the proposal is considered to accord with LDP Policies SP16 (Environmental Protection) and EN8 (Pollution and Land Stability), the Pollution SPG and TAN 11 (Noise).

Ground Investigation

- 6.36 A Phase 1 Geoenvironmental Report produced by Tetra Tech summarised that there is potentially substantial thickness of made ground and re-worked strata on the site. Consequently, there is a potential for contaminants to be present within the near surface materials, posing a risk to future users. The potential for asbestos containing materials to lie within the made ground and demolition material cannot be ruled out. A detailed UXO risk assessment is not necessary, with the site classified as low risk. In terms of the risk associated with the wider environment, this is classified as low to moderate.
- 6.37 From a geotechnical perspective, there is a high-risk development area located to the north of the site in respect of coal mining. As a result of the site’s use and location in a highly industrialised setting, made ground is likely to be present across the site. The characteristics of the made ground, in addition to in

ground obstructions from previous work at the site are likely to make up the key geotechnical constraints associated with the site.

- 6.38 The report concludes with a series of recommendations which include the geotechnical testing of soils, returning to monitor land gas and groundwater, and an interpretive geotechnical assessment of ground conditions at the site.
- 6.39 As a result of the findings of the Phase 1 Report, a ground investigation is required. Further assessment through an intrusive ground investigation is required for made ground connected with the current development on site along with the reworked deposits and possible made ground associated with the landscaped ground identified across the application site and surrounding areas. The depth to competent strata, presence of soft/inappropriate materials, depth to groundwater and soil infiltration rates require ground investigation in respect of ground conditions and possible geotechnical constraints. The ground investigation will aim to assess several elements including the installation of land gas and groundwater monitoring wells, geotechnical testing of soils and return visits to monitor land gas and groundwater.
- 6.40 The Ground Investigation Report advised that the anticipated exposure to sub surface soils will be substantially courtesy of the presence of hardstanding with in the site. Due to the development which has already taken place at the site, a reactive approach is recommended in order to identify any contamination which hasn't previously been identified during works on site. In terms of ground gas, no protection measures are considered necessary for the site.
- 6.41 From a geotechnical perspective, traditional pad or strip foundations within natural deposits using conventional methods may be utilised. Pad foundations within the natural deposits should result in settlements of less than 25mm.
- 6.42 In summary, the recommendations of the reports will be implemented that will allow the proposal to comply with LDP Policy M2 (Surface Coal Operations).

Energy

- 6.43 A Low Zero Carbon Study and Net Zero Carbon Report have been provided in order to meet the requirements of LDP Policy RE1 (Criteria for the Assessment of Renewable and Low Carbon Energy Development).

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Neath Port Talbot County Borough Council Education Department for the proposed demolition of existing comprehensive school and loss of existing sports fields, construction of new comprehensive school, modified car parking arrangement, inclusion of sports pitches and multi use games areas, lighting, landscaping and associated infrastructure works at land at Llangatwg Comprehensive School, Main Road, Cadoxton, Neath, SA10 8DB.
- 7.2 The proposal is for a modern school building with associated external facilities which will provide an exciting environment for students and offer community uses beyond school hours. The principle of redeveloping the site is well established given the site is currently operating as a school. To ensure minimum disruption, the existing school and community facilities will remain operational until the replacement premises are finished whilst the new school is under construction.
- 7.3 The proposals are considered to be visually acceptable in design terms, representing an appropriate development within an urban area that is bordered mostly by residential dwellings. The proposed C-shaped school building aims to address the key constraints associated with the site, whilst offering favourable access points for pupils, staff and community, with a discrete entrance for the LSC, secure delivery and servicing arrangements along with an improved external space.
- 7.4 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 Landscape Masterplan introduces extensive new planting, improved habitat connectivity, and dedicated green infrastructure features, in line with Building with Nature Standards resulting in a strong biodiverse environment.
- 7.5 The submitted Transport Statement confirms the development is in an appropriate and accessible location. It is served by a safe access, relevant parking facilities are available and it is the traffic generated will have no detrimental impact on highway conditions. As such there are no highway/transport issues associated with the proposal. Furthermore, the scheme also encourages sustainable transport choices, with improved pedestrian access, cycle storage facilities for students and visitors, and improved site circulation.
- 7.6 The scheme design has been developed following pre-application discussions with the local planning authority, and aims to align with their aspirations. Several technical reports have been produced to accompany the application which address topic specific issues which are relevant to the proposal. Matters relating to highways, ecology, flood risk and green infrastructure have been considered as part of the proposal.
- 7.7 Material considerations include PPW12, Building Better Places, TANs and SPG, all of which support the development, as set out above. The content of this statement has demonstrated how the scheme can be seen to comply with prevailing national planning policy, guidance and legislation. This includes compliance with requirements of Planning Policy Wales Edition 12, the inclusion of Sustainable Drainage Systems (SuDS) features that comply with national standards (The Flood and Water Management Act 2010 (Schedule 3)) and compliance with Building Better Places - The Planning System Delivering Resilient and Brighter Futures. The statement has also set out the material considerations considered as part of the proposal, demonstrating the positive weight of those material considerations.
- 7.8 As such, it is concluded that the proposal fully accords with both national and local policies. There are no material considerations which would prevent the planning application from being determined in

accordance with the relevant planning policy framework. In this respect, it is respectfully requested that the Local Planning Authority consider this planning application favourably and grant planning permission for the proposed development.