

PLANNING STATEMENT

**LAND OFF HELO-Y-GLO, TONNA,
NEATH SA11 3NJ**

August 25



Summary

Proposal

Development of 9 No. affordable apartments, highways arrangements, access, parking, landscaping, drainage and all other associated works

Location

Land off Heol-Y-Glo, Tonna, Neath SA11 3NJ

Date

August 25

Project Reference

S25.171

Client

Tai Tarian Ltd

Product of

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Report Revision No.

Revision A

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Introduction

This full application proposes the development of 9 No. affordable apartments, highways arrangements, access, parking, landscaping, drainage and all other associated works at land off Heol-Y-Glo, Tonna, Neath, SA11 3NJ.

- 1.1 Asbri Planning is appointed as planning agent to Tai Tarian Ltd to prepare this Planning Statement to accompany development of 9 No. affordable apartments, highways arrangements, access, parking, landscaping, drainage and all other associated works at land off Heol-Y-Glo, Tonna, Neath, SA11 3NJ.
- 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 by Spring Design to accompany the application:

Drawing name	Drawing reference
Location Plan	2641-00(03)101A Location Plan
Proposed Site Layout	2641-00(03)100D Site Layout
Ground Floor Plan	2641-211(03)200A 211 GF Plan
First Floor Plan	2641-211(03)201A 211 FF Plan
Second Floor Plan	2641-211(03)202A 211 SF Plan
Side Elevations	2641-211(03)300A 211 Side Elevations
Front Elevations	2641-211(03)301A 211 Front Elevations
SuDS Strategy Plan	2641-500-1-A - SUDS Strategy Plan
Engineering Levels Plan	2641-501-1-A - Engineering Appraisal Plan
Proposed Site Access	2641-SK550-A Proposed Site Access
Swept Path Assessment (1 of 3)	2641-SK555-01-A - Swept Path Assessment (1 of 3) 2641-SK555-02-A - Swept Path Assessment (2 of 3) 2641-SK555-03-A - Swept Path Assessment (3 of 3)
Soft Landscape Proposals	1217.01 Rev B_SOFT LANDSCAPE PROPOSALS

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

Document	Prepared by
Planning application forms (1APP)	Asbri Planning
Planning Statement	Asbri Planning

Covering Letter	Asbri Planning
Tree Survey	Treescene Arboricultural consultants
Tree Constraints Plan	Treescene Arboricultural consultants
Preliminary Ecological Assessment	Ecological Services Ltd
Updated Site Assess	Ecological Services Ltd
Geo-environmental/technical appraisal	Integral Geotechnique
Green Infrastructure Statement	DP Landscape Architecture
Energy Strategy Statement	Spring Design

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 The site is located within the village of Tonna, situated approximately 3.1km north east of Neath town centre. It is found on the eastern boundary of Tonna off the B4434 along Heol-Y-Glo Road.

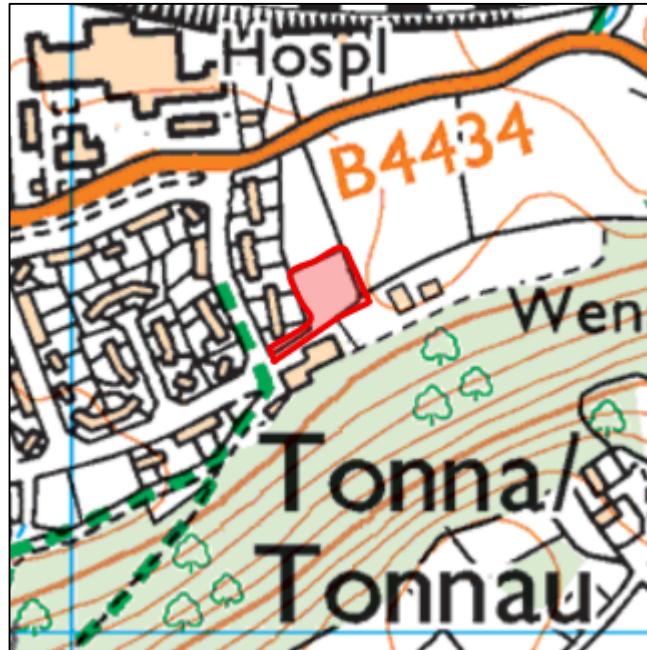


Figure 1: Site Location, OS Map, DataMapsWales

Site Description

- 2.2 The site is an irregular shaped parcel of land that extends to approximately 0.24 Ha, roughly being two adjacent almost rectangular areas of land. The site sits at the south east end of Heol Y Glo and immediately to the north of an industrial unit and storage yard under the ownership or former ownership of Tonna Luxury Coaches. The site currently comprises of hardstanding which appears to be utilised as a parking area, alongside two semi-detached residential dwellings and their curtilage. Access to the site appears to be via the neighbouring Tonna Luxury Coaches site, which the car park serves, at the site's southern boundary. It appears the site as a whole is not currently accessible via the adopted highway. The area to the west and north west of the site is crisscrossed by roads in an area of mainly residential housing. An area of allotments is located to the east of Heol Y Glo and to the north of the concrete hardstanding area of the site. Housing stock in the immediate area is generally made up of semi-detached properties. Immediately to the east of the proposed site is several livestock grazing and hay meadows bounded by tree lines and hedgerows, the fields follow the B4434 minor road.
- 2.3 In respect of surroundings, the site is set in an area of primarily residential uses. Dwellings at Heol-Y-Glo adjoin the site to the north and west. Allotment gardens adjoin the sites northern boundary, whilst agricultural land directly adjoins the site's eastern boundary. The Tonna Luxury Coaches site adjoins the site's southern border. It is thought residential properties may have once stood on this land parcel from the previous planning history

- 2.4 Within the wider area Heol-Y-Glo directly joins onto the B4434, originates in Neath and runs north-east through Tonna to Resolven. The Tonna Hospital Site is located approximately 105m north from the subject site. The River Neath & Neath canal are situated approximately 275 metres north of the subject site.
- 2.5 The nearest bus stop is Tonna Hospital Uchaf, approximately 200 metres west of the site, which provides access to the X7 Cymru Clipper (Swansea – Neath – Glynneath) and X5 (Swansea – Neath) service. The nearest train station is Neath, approximately 3.5km south west of the site. The Nearest public rights of way run in front of the proposed site entrance and towards and up the wooded area south, it does not directly interfere with the site.
- 2.6 In respect to historic features there are no listed buildings or protected sites of historical importance within the immediate area. The nearest site is a grade II listed building approx. 500m west of the site.

Planning History

- 2.7 The application site/property has the following relevant planning history:

Proposals	Date determined	Decision
P2008/0915 - Outline application for 8 No. dwellings (Tennis Court Garage).	15/07/2010	Granted
P2008/0793 – Details of Floor Levels Pursuant to Condition 12 of Planning permission P2008/0241	23/06/2008	Granted
P2008/0792 – Approval of details relating to the eradication of Japanese knotweed and the erection of bird nesting boxes pursuant to conditions 7 and 8 of planning permission P2008/0241	23/06/2008	Granted
P2008/0788 – Approval of details of drainage pursuant to conditions 9, 10 and 11 of planning permission P2008/0241	24/07/2008	Granted
P2008/0241 – Erection of a terrace of 3 No. dwellings	21/04/2008	Granted
P2006/0453 – Outline Residential	06/06/2006	Granted
P2000/1206 – Demolish flats, with site clearance and landscape to site, to form an amenity area	16/11/2000	Granted

Proposal

This full application proposes the development of 9 No. affordable apartments, highways arrangements, access, parking, landscaping, drainage and all other associated works at land off Heol-Y-Glo, Tonna, Neath, SA11 3NJ.

Amount, Scale and Layout

- 3.1 The 9 No. affordable apartments will be set in a single detached block set over 3 storeys in terms of scale and seeks to achieve a permeable and cohesive development that sits well within the existing context of the site surroundings, creating an attractive place to live. The proposal offers an exciting opportunity for the Council to deliver sustainable new homes in an accessible location whilst re-developing a redundant site.
- 3.2 The site will be served by a new junction from Heol-Y-Glo, with an internal access route providing the primarily vehicular and pedestrian access point to the development. The development will be served by dedicated car parking provision. A car parking area to serve the apartments is situated along the access road opposite of the apartments. A bin storage area is proposed in close proximity to the parking area – to allow for convenient waste collection.
- 3.3 It is envisaged the proposed development will serve as a gateway development, with future residential proposals utilising the access proposed as part of this development. The path of the future access is indicated on the enclosed Site Layout Plan.

Appearance

- 3.4 The exterior of the development will be largely rendered & brickwork frontage and projecting elements completed in weatherboard finish with symmetrical fenestration. The material palette along Heol-Y-Glo is not dissimilar to what is proposed and would be reflective with the proposed development.

Boundary Treatment & Landscaping

- 3.5 The quantum of residential development shown has been influenced by the site's opportunities and constraints, whilst also considering the overarching need to introduce green infrastructure, open space and SUDS features. The development utilises a scheme of sustainable drainage, which includes a SuDS basin which will contribute towards both the sustainable management of water and the site's Green Infrastructure strategy. Rain gardens will also be utilised as part of the landscaping and green infrastructure strategy. The development proposals prioritise the retention of trees and existing natural features, creating a vibrant and verdant neighbourhood, demonstrating the scheme's purposeful approach towards Green Infrastructure provision.

Sustainability

- 3.6 Sustainability is an important quality that is promoted by both National and Local Planning Policies. The site is also considered to be within a highly sustainable location, with public transport links nearby and within walking distance. In addition, the proposal involves the construction of a residential development on brownfield land, which will make beneficial use of a currently vacant, underutilised site.

The design team will consider the final energy strategy through future detailed design considering the following:

- A "fabric first" approach and passive design measures to reduce the energy demand of the development.
- An all-electric energy solution will be explored for both heating and water. Solutions include air-source heat pumps for hot water and solar photovoltaic panels for on-site energy consumption.

- Further energy saving measures such as low energy lighting and electric vehicle charging points have also been considered.

Pre-Application Discussions

- 4.1 As part of this proposal Pre-Application advice was sought after with Neath Port Talbot County Borough Council in order to best promote the proposed development moving forward. The response supplied detailed advice on the proposed development and how best to move forward with a full application.
- 4.2 The local context of the site was outlined in the pre-application as a brownfield site that would be classed in the proposal as a backland development. The pre-application indicates that the land adjacent, east, of the site is a candidate site for residential housing (RLDP/N/45) within the Replacement Local Development Plan (RLDP).
- 4.3 In terms of constraints the response indicates that there is no further requirement from the Coal Remediation Authority due to the site being within a Low-Risk Area. The site does adjoin easterly to an Area of Special Conservation however this is also the candidate site for housing allocation as it is well contained and a natural location for expansion for the village with minimal impact to the conservation area. As for minerals the site shares common boundaries with safeguarded category 1, gravel and sandstone but is envisioned that the proposal would not interfere with the resource by definition of the policy.
- 4.4 Biodiversity constraints were also raised as the site falls within a Phase 1 Habitat Area and Extended Habitat surveys would be required. There was an initial PEA conducted in 2024 that outlined various mitigations and compensations may be needed and that further ecological input will be required.
- 4.5 For planning policy, the council's response outlines a number of national and local policies in regards to Future Wales: National Plan 2040, Planning Policy Wales (Edition 12, February 2024), TAN's, and Neath Port Talbot Local Development Plan (2011-2026), and Supplementary Guidance.
- 4.6 The Council's also provided an in-depth analysis of the proposal on the viability of the development and how best to proceed with a full application and what would be required of the applicant in order for a successful application to be considered

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 Local Development Plan (2011-2026) (Adopted 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 Neath Port Talbot County Borough Local Development Plan (Adopted 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.

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.

Housing

5.15 The provision on affordable housing is a key priority within the Welsh Government which is identified at Page 72 that 'The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised'.

5.16 Policy 7 of Future Wales is of key relevance in regards to delivering affordable homes which states the following:

5.17 *Providing housing in Wales at levels which meet our needs is a key priority for the Welsh Government. The planning system must facilitate the provision of additional market and affordable housing. There is a complex picture of housing need and provision with the opportunities people have varying significantly depending on income and where they live in Wales.*

5.18 *The national and regional estimates of need do not reflect future policies or events and are not a Housing Requirement for Wales or the regions. However, the estimates do provide part of the evidence and context on which housing policy and requirements can be based. The estimates of market and affordable housing need should inform the housing requirements set out in Strategic and Local Development Plans and it is expected the housing requirements will differ from the estimates of housing need*

Biodiversity and Green Infrastructure

5.19 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).

5.20 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).

5.21 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

5.22 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).

5.23 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).

5.24 Policy 12 – Regional Connectivity

The Welsh Government will work with Transport for Wales, local authorities, operators and partners to deliver the following measures to improve regional connectivity:

- Active Travel – Prioritising walking and cycling for all local travel. We will support the implementation of the Active Travel Act to create comprehensive networks of local walking and cycling routes that connect places that people need to get to for everyday purposes.
- Bus – Improve the legislative framework for how local bus services are planned and delivered. We will invest in the development of integrated regional and local bus networks to increase modal share of bus travel and improve access by bus to a wider range of trip destinations.
- Metros – Develop the South East Metro, South West Metro and North Wales Metro. We will create new integrated transport systems that provide faster, more frequent and joined-up services using trains, buses and light rail.
- Ultra-Low Emission Vehicles – Support the roll-out of suitable fuelling infrastructure to facilitate the adoption of ultra-low emission vehicles, particularly in rural areas.

Local Level

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

5.26 The following Neath Port Talbot County Borough Council’s LDP policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
Strategic Policies	
SP1	Climate Change
SP2	Health
SP4	Infrastructure
SP3	Sustainable Communities
SP7	Housing Requirement
SP8	Affordable Housing
SP10	Open Space
SP15	Biodiversity and Geodiversity
SP16	Environmental Protection
SP19	Waste Management
SP20	Transport Network
SP21	Built Environment and Historic Heritage
Topic Based Policies	
SC1	Settlement Limits
H1	Housing Sites

AH1	Affordable Housing
I1	Infrastructure Requirements
OS1	Open Space Provision
EN2	Special Landscape Areas
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
TR2	Design and Access of New Development
BE1	Design
W3	Waste Management in New Development

National Policy and Guidance

Planning Policy Wales Edition 12

- 5.27 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.
- 5.28 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"*.
- 5.29 Paragraph 1.18 sets out that *"Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated"*.

Good Design

- 5.30 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"*.
- 5.31 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"*.
- 5.32 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”.

- 5.33 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 this function together to contribute toward the quality of places”.

- 5.34 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”.*

Housing

- 5.35 It states in the PPW in Paragraph 4.2.1 that planning authorities must understand all aspects of the housing market in their areas, which will include the requirement, supply and delivery of housing. This will allow planning authorities to develop evidence-based market and affordable housing policies in their development plans and make informed development management decisions that focus on the creation and enhancement of Sustainable Places. New housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for a range of identified housing needs and contribute to the development of sustainable and cohesive communities.
- 5.36 Paragraph 4.2.26 confirms a community’s need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications. Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers (as per the definition for AH within para. 4.2.27).
- 5.37 Paragraph 4.2.30 outlines development plan policies to make clear that an element of affordable housing or other developer contributions are required on specific sites, this will be a material consideration in determining relevant applications. Applicants for planning permission should therefore demonstrate and justify how they have arrived at a particular mix of housing having regard to development plan policies. If, having had regard to all material considerations, the planning authority considers that the proposal does not contribute sufficiently towards the objective of creating mixed communities, then the authority will need to negotiate a revision of the mix of housing or may refuse the application.

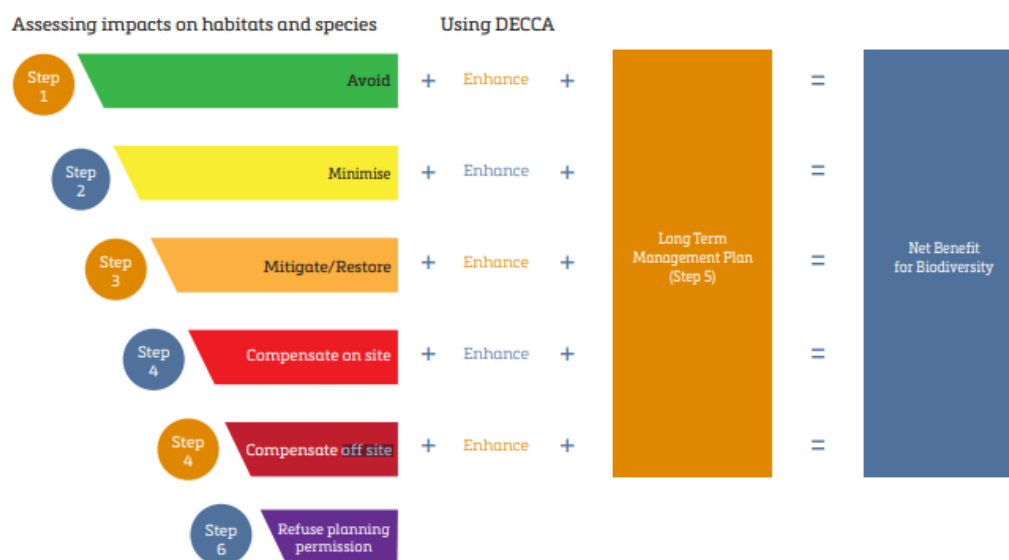
Green Infrastructure

- 5.38 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”.*
- 5.39 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”.

- 5.40 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)

- 5.41 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

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

- TAN 2: Planning and Affordable Housing (June 2006)
- TAN 5: Nature Conservation and Planning (September 2009)
- TAN11: Noise (October 1997)
- TAN 12: Design (March 2016)
- TAN15: Development and Flood Risk (March 2025)
- TAN 18: Transport (March 2007)

- 5.43 TAN 2 Planning and Affordable Housing (2006): outlines the general concept of affordable housing as being: “the ability of households or potential households to purchase or rent property that satisfies the needs of the household without subsidy”. The guidance requires local planning authorities to: “include an affordable housing target in the development plan which is based on the housing need identified in the local housing market assessment, indicate how the target will be achieved using identified policy approaches and

monitor the provision of affordable housing against the target and where necessary take action to ensure that the target is met”.

- 5.44 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.
- 5.45 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.
- 5.46 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*
- 5.47 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

- 5.48 The following Supplementary Planning Guidance (SPG) adopted by **LPA Name** is of relevance to the proposed development:
- Planning Obligations (October 2016)
 - Parking Standards (October 2016)
 - Affordable Housing (October 2016)
 - Biodiversity and Geodiversity (May 2018)
 - Pollution (October 2016)
 - Open Space & Greenspace (July 2017)
 - Design (July 2017)

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
 - Density, tenure and dwellings proposed
 - Visual amenity
 - Residential amenity and living conditions
 - Biodiversity and ecological impact
 - Flooding and drainage
 - Accessibility to the site

Principle of Development

- 6.3 The proposed site will fall within the settlement limits of Tonna and therefore will satisfy the Policy of SC1 Settlement Limits. The site comprises whiteland within settlement limits of Tonna in the adopted Neath Port Talbot LDP, that would represent a suitable development of a redundant site whilst addressing housing need in the area.
- 6.4 National policy, embodied in Planning Policy Wales 12 seeks to maximise the use of land as a resource and emphasises that planning policies, decisions and proposals should promote resource efficient and climate change resilient settlement patterns that minimise land take and urban sprawl. It also states that developments should be located to minimise the demand for travel, especially by private car and to ensure that all local communities have sufficient good quality housing for their needs, including affordable housing.
- 6.5 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. The site meets this requirement as it represents efficient use of previously developed land within an accessible and sustainable location. The site's redevelopment for residential use will result in both a compatible and more visually acceptable use.
- 6.6 The site is considered to be in compliance with being proportionate in scale and form to the role and function of the settlement. It is considered that the site also allows for the capacity to further promote new development around the settlement. Policy SP3 operates in tandem with SC1 to secure the delivery of sustainable, healthy, and cohesive communities and the conservation of the countryside.
- Tonna is classed as a small local centre that has adequate public transport links with at least one shop and/or several community facilities. Because of this the site would be a sustainable location and that Tonna can appropriately accommodate growth with no noted conflicts with SC1 policy.
- 6.7 In regards to housing policies the site would be classed as a small windfall site, with a capacity of less than 10 residential units, and would contribute to the council's LDP objective 7 of providing an adequate supply,

mix, type and tenure of housing with sustainable settlement in comparison to existing dwellings along Heol-Y-Glo currently. The site would contribute to Policy SP7 which targets to build additional homes within the county, between the LDP timeframe and would also contribute the council's target of providing Affordable Homes. Policy SP8 outlines the targets for Affordable Housing where within the proposed site would be a target of 25%, however due to the proposal, all dwelling within the development will be Affordable and therefore would make the site acceptable in respect to SP8.

Density, tenure and dwellings proposed

- 6.8 The development proposed is a single detached L-shaped building providing 9 no. affordable apartments sitting across 3 storeys each being 1-bedroom apartments with two variations of apartments throughout the building which will all be in line with the WDQR (2021) requirements. Each flat offers open plan living accommodation with 1-bedroom and bathroom. The floor areas provide ample living space with private access through the means of a communal hallway, featuring protected corridors set around a stair core. The layout also provides well illuminated space with means to control noise.
- 6.9 The tenure on the proposal will be developed for/by a registered social landlord as 100% affordable housing. In the case of properties being provided by registered social landlords as tenure neutral will be supported by the affordable housing SPG as it would allow greater flexibility in addressing the housing need of the area. This is also supported within the views of the Welsh Government's TAN 2 advise as Authorities will be flexible in terms of tenure reflecting the adopted policy position.
- 6.10 Tai Tarian would be contributing valuable affordable homes that would help support policy SP8 and justify the mix of housing with regards to policy through the availability of housing already in existence along Heol-Y-Glo which would also be supported by Mid and Southwest Wales Housing Assessment the summarises that within Neath Port Talbot there is a particular need for 1-bedroom properties. These dwellings will also again be met to ensure high quality affordable / social housing and will meet the 8 components within creating beautiful homes and places.

Visual amenity

- 6.11 The proposal aims to provide a detailed level of design and is believed to adhere to criteria set in Policy BE1. This sets out a level of high quality of design and fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive and sustainable places. In regards to Policy BE1 the proposal will also reflect those principles within the TAN 12 that gives guidance on achieving successful design in developments.
- 6.12 Due to the location of the site in order to create access to the site the green space adjoined to Heol-Y-Glo will be transformed into the access road supplying the apartment block. In regards to the location of the proposed development it will be established as a backland development upon the underutilised brownfield site. The proposed plans show the building standing at 3-storey with a secluded amenity area and suitable parking for each apartment. The site also displays the possibility of extending the road into RLDP candidate site.
- 6.13 In regards to the exterior of the development there is a largely rendered & brickwork frontage and projecting element completed in weatherboard finish with symmetrical fenestration and use of cladding on the forward set sections that are completed with a flat roof parapet. It is argued that this is a simple use of materials but in relation of the material palette along Heol-Y-Glo it would be reflective of the adjacent surrounding dwellings and therefore be in keeping with the locality of the site. In relation of landscaping this is described in greater detail within the Green Infrastructure Statement provided by DP Landscape Architecture.

Residential amenity and living conditions

- 6.14 In respect to residential amenity the proposed development due to its precise design and orientation would be a suitable distance away from neighbouring residents as to safeguard levels of privacy currently enjoyed. The site layout drawing also supports the view that residential amenity will be safeguarded and will be compliant with Policy BE1 and planning guidance. Although it is highlighted the location of the outdoor amenity space is heavily overlooked by the proposed building it is considered that the space around the property is open enough not to create a presence of overbearing along with the access to the frontage of the property also.
- 6.15 To protect residential amenity during the site construction, phase the proposed site will be supported with a Construction Environmental Management Plan (CEMP) to ensure the safety and residential amenity is protected throughout the development and minimise/mitigate such impacts. A noise impact assessment can be conducted also to prove the fact that two uses can co-exist and thrive around the development proving to be a suitable place to live.
- 6.16 It is important to also recognise that the proposed development has left the potential of further development in the neighbouring field to the east and therefore must consider future residential amenity. In respect to that, the proximity of the commercial building will have to be considered, it is mentioned within the pre-application that the operations of the business are unknown but from recent searches it appears to still be operational as of this report and therefore any future developments would have to realise the sensitivity of noise. However, due to the relation of the commercial business it is not envisioned that this would not be of significant impact as the main relation of noise will be the coming and going of transport buses and would not be consistent throughout the day.

Biodiversity and ecological impact

- 6.17 The site has been subject to a preliminary ecological survey and an up-to-date site assessment which was undertaken by Ecological Services Ltd. The surveys involved an initial desk-based assessment and data search as well as a physical walkover survey, the latter assessment being undertaken in optimal survey season.
- 6.18 The proposed development will likely result in the loss of areas of concrete hardstanding and its associated colonising vegetation, Bramble scrub, trees, woody scrub, semi- improved grassland, tall ruderal vegetation, short perennial vegetation, and marshy grassland. The habitats within the site are considered to have biodiversity value at a local level only. The current biodiversity value of the site is considered to be of local value only. Direct habitat loss implications within the development site can be limited by compensatory planting and suitable management of retained green spaces which are incorporated within the site plans.
- 6.19 To demonstrate a biodiversity enhancement and improvement to green infrastructure a provision of a range of bird and bat boxes on the proposed buildings could provide additional habitat for such species not currently found at site. A reptile hibernaculum could be created in the north west corner of the site adjacent to the allotment boundary to the north.
- 6.20 It is envisioned that due to the minimal biodiversity value of the site, its development would have little conflict with policies SP15, EN6 and EN7 and the proposed plans would introduce green infrastructure around the site along with the inclusion of SuDS around the access road.
- 6.21 To support this application, a green infrastructure statement has been submitted which will promotes the design in a proportionate scale along with being of high quality. This statement will also prove that the

development will be accordance of overarching national policy where the sites feature will appropriately assess and mitigate against potential impact.

Flooding and drainage

- 6.22 Although the site lies outside the impact of flooding from Rivers/Seas there is the potential impact from surface water/watercourses along the access of the proposed development. Within the plans there is significant SuDS areas positioned in and around this area to help mitigate against the potential flood risk, as sustainable drainage systems are an integral part of design and approaches for new developments. Due to the size of the proposal the site will also seek the approval of SAB before construction in line with the new TAN15 advise to ensure suitable development. In the requirement of Policy BE1 (9) the proposal must connect with existing foul drainage to the main sewer. In order to ensure consistency of design and facilitate long-term maintenance the sewers will be built to Welsh Government standards and is envisioned that there will be adequate capacity to do so.

Accessibility to the site

- 6.23 The Proposed site has taken into consideration of the council's comments within the pre-application of the access to the site, as it was originally going to demolish the two buildings to the west of the site in order to create access but have taken onboard the advice now utilising the land south of said buildings to create access. The access would now be in greater connectivity of the existing road and will be in accordance of the guidance for designing and modifying residential streets. The proposal supports the advice displayed with these guidance as it conforms with the road and pavement requirements along with trying to support non-private vehicular transport with the inclusion of open pavements and bike racks available to future residents of the proposal. In respect to the above it is considered that the proposal will not have unacceptable impact on highway safety and therefore support policy SP20 along with TR2.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Tai Tarian Ltd in relation to the proposed full planning application for development of 9 No. affordable apartments, highways arrangements, access, parking, landscaping, drainage and all other associated works.
- 7.2 To conclude to the application consists of a backland development of a 3-storey building that will accommodate 9 socially rented 100% affordable dwellings (AH1), that will be managed by licenced applicant Tai Tarian. The application is considered as a small windfall site and due to the number of proposed dwellings will not require a Pre-Consultation Assessment as it does not meet the threshold for this requirement. The development is within settlement limits (SC1) and will be developed on a brownfield site, of approx. 0.24 Ha, which is considered more favourable than greenfield in both local and national policies.
- 7.3 The site is considered suitable for development and is proposed in the revised Local Development Plan to be allocated as Housing development (RLDP/N/0045) in the near future along with the field to the east of the site. The application utilises the land efficiently with also providing variety in housing type along Heol-Y-Glo along with suitable access to the development that promotes the potential of further development to the east.
- 7.4 The plans of the development provide the insight of the site and is considered to of a high quality of design while reflecting the local dwellings within the area that would meet the local and national standards. This would further promote the amenity of the development and considers the residential amenity within these plans also with careful consideration for both existing and future occupiers of the surrounding area while exploring the potential of residential and commercial properties co-existing around one another.
- 7.5 As for constraints regarding the proposal the development will only look to improve the current biodiversity and ecological value of the site due to the lack of green infrastructure around currently and will therefore be in compliance of EN6 and EN7 and further national policy set out in PPW12. The development will be further supported by a Green Infrastructure Statement and various impact assessments to prove suitability of the site. For the issue of potential surface water and watercourse flooding the plans implement an extensive SuDS within the area most envisioned by NRW's Flood Map by the access of the development which should see to counter and satisfy SAB in suitable flood management.
- 7.6 The proposals therefore comply with the relevant national and development plan planning policies and supplementary planning guidance. It is for these reasons that it is respectfully requested that Neath Port Talbot County Borough Council grant planning permission for the proposed development.