

PLANNING STATEMENT

**THE RED DRAGON,
MOORLAND ROAD,
SANDFIELDS,
NEATH PORT TALBOT,
SA12 6JZ**

August 2025



Summary

Proposal

Demolition of existing public house, and construction of a residential development and associated infrastructure works

Location

The Red Dragon, Moorland Road, Sandfields, Neath Port Talbot, SA12 6JZ

Date

August 2025

Project Reference

S24.163

Client

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Product of

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Introduction

- 1.1 Asbri Planning is appointed as planning agent to Swansea Developments SPV 1 Ltd to prepare this Planning Statement to accompany the proposed demolition of existing public house, and construction of a residential development and associated infrastructure works at the Red Dragon, Moorland Road, Sandfields, Neath Port Talbot, SA12 6JZ.
- 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 RLH Architectural and DP Landscape Architecture accompany the application:

Drawing name	Drawing reference
Location Plan	R590-100B
Topographic Survey	R590-101A
Constraints Plan	R590-102B
Proposed Site Plan	R590-103B
Proposed Site Elevations 1 of 2	R590-104
Proposed Site Elevations 2 of 2	R590-105
Proposed 3D Views and Map Key	R590-106B
Proposed External Finishes Sheet	R590-108B
Proposed External Finishes Site Plan	R590-109
Proposed Boundary Treatment Plan	R590-110
Proposed Domestic Lighting Plan	R590-111
Proposed Ecology Plan	R590-114
2P1B Block of Flats Ground and First Floor Plan	R590-115A
2P1B Block of Flats Second Floor Plan and Section A-A	R590-116A
2P1B Block of Flats Proposed Elevations	R590-117B
Soft Landscape Proposals	1264.01A
Engineering Layout	10420-100-01-D

1.4 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application forms (1APP)	Asbri Planning
Design and Access Statement	Asbri Planning
Planning Statement	Asbri Planning
PAC Report	Asbri Planning
Covering Letter	Asbri Planning
Transport Statement	Apex Transport Planning
Green Infrastructure Statement	DP Landscape Architecture
Site Assessment Survey	Ecological Surveys
Bat Survey	Ecological Services
Market Assessment Report	BP2 Land and Property Consultants
Tier 2 Geotechnical and Geoenvironmental Assessment	Terra Firma

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 subject site is located within the community of Sandfields, Port Talbot, and is situated approximately 1.9 km west of Port Talbot Town Centre. The subject site extends to approximately 0.21 hectares. Contained within the site is The Red Dragon pub and associated car parking area, along with some grass/amenity space. The Red Dragon Public House shown in Figure 1 is a part single, part two storey property with a mixture of pitched and flat roofs, set on the corner of Moorland Road and Abbeyville Avenue. The original structure has been subject to a number of alterations and this explains the peculiar form and aesthetic appearance of the property. The site is predominantly flat with no substantial changes in levels.



Figure 1 : View of application site from Moorland Road

- 2.2 Vehicle access is currently achieved at the site's southern boundary, from Moorland Road, which runs parallel to the southern boundary. The site can be accessed on foot from Abbeyville Avenue which runs parallel to the site's eastern boundary. The site benefits from good levels of pedestrian accessibility, with pavements lining both sides of the carriageway.
- 2.3 In respect of surroundings, the locality can be characterized as primarily residential in nature, with the recently developed County Flats Phase 1 located opposite the site as illustrated in Figure 2. To the north of the pub are residential dwellings, with the nearest pair of semi-detached properties constructed within the last two years which are shown in Figure 3. Moorland Road and Abbeyville Avenue adjoin the land's southern and eastern facing boundaries respectively.



Figure 2 : County Flats Phase 1 development.



Figure 3 : Relationship between Public House and properties to the north.

- 2.4 The subject site benefits from excellent connections to the surrounding infrastructure networks. There are multiple facilities in close proximity to the site including schools, beach, supermarkets, theatre and dentists. The site is well connected with Port Talbot Town Centre which contains an array of services and facilities.
- 2.5 The site is in close proximity to the M4 motorway, offering access towards destinations across South Wales and England. The nearest bus stop adjoins the site boundary along Moorland Road. The Red Dragon stop provides access to the number 82 Port Talbot Bus Station service which operates on an hourly basis. The nearest train station is located in Port Talbot, approximately 2 kilometres east of the site which is served by both Transport For Wales and Great Western Railway providing services to Cardiff Central, Milford Haven and London Paddington. National Cycle Route 4 can be accessed in close proximity to the site near Afan Way. The route is a long distance trail extending almost 700 kilometres and runs from London to Fishguard. There are no public rights of way contained within or immediately adjoining the site, however

two active travel routes adjoin the site (Reference: FR-PT-SU091 and FR-PT-SU094) as illustrated in Figure 4.



Figure 4 : Active Travel Routes in relation to application site (Source : Data Map Wales)

- 2.6 The Flood Map For Planning indicates the site lies outside any flood zone and is not likely to suffer from flooding.
- 2.7 A review of Cadw's records shows that no listed buildings or scheduled monuments are located on site. The nearest heritage asset lies to the north east of the site at the Grade II listed War Memorial located in Vivian Park. The War Memorial has been registered for its historic interest.
- 2.8 A review of the Mining Remediation Authority Interactive Map reveals that the site is not in a Development High Risk Area, although the site does lie within the South Wales Coal Mining Reporting Area.
- 2.9 The Local Development Plan Interactive Map indicates the site lies within settlement limits and is not subject to any environmental or ecological designations.
- 2.10 In terms of planning history at the site, a review of Neath Port Talbot's planning history indicates that the site and nearby surroundings has the following relevant planning history:

Reference	Proposals	Decision
P2015/0285	(Red Dragon Public House) – Single storey side extension.	Approved 21/07/2015
P2018/0454	Construction of a block of 10 apartments, associated parking, secure bicycle store, bin store and landscaping.	Refused 16/07/2018
P2019/0413	Pair of semi-detached two bedroom dwellings (Outline all matters reserved)	Approved 11/06/2019

P2021/0155	(Red Dragon Public House) – Single storey side/rear toilet extension	Approved 19/03/2021
P2022/0351	2 number semi-detached residential units with accompanying garden stores	Approved 10/06/2022
P2023/0108	Discharge of condition 3 (foul drainage), 4 (materials) and 5 (boundary treatments) of planning permission P2022/0351 for 2 number semi-detached residential units with accompanying garden stores	Approved 28/03/2023

Proposals

- 3.1 The proposed scheme will see the proposed demolition of existing public house, and construction of a residential development and associated infrastructure works. The development will comprise the following accommodation types:
- 16 no. 1 bedroom flats; and
 - 6 no. 2 bedroom flats.
- 3.2 The area to be developed for housing is 0.21 hectares, which results in a development density of 104.8 dwellings per hectare.
- 3.3 The development 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 Swansea Developments SPV 1 Ltd to deliver sustainable and modern homes in an accessible location. The site can adequately accommodate the proposed dwellings with the associated access, amenity and parking areas, without causing detriment to existing or future residents. The dwellings will be offset from its boundaries and the scale and design will ensure no adverse impact on residential amenity of adjacent properties. All units will be WDQR compliant.
- 3.4 In respect of design, it is envisaged that the block of flats will provide visual and aesthetic improvement upon the existing street scene – positioning a strong corner building with active frontage that addresses both Moorland Road and Abbeyville Avenue. It is thought a strong frontage that addresses both Moorland Road and Abbeyville Avenue will replicate the building lines observed in the surrounding area, creating continuity in siting and design. In terms of scale and height, the proposal will be part three storey and part two storey, in recognition of the heights of structures in the vicinity of the site.
- 3.5 The materials chosen will seek to enhance the immediate environment, with inspiration taken from the recently developed Phase 1 of County Flats. The utilisation of cladding along with mixed fairfaced brick has been influenced by the County Flats development opposite the application site. It is envisaged the perimeter planting will help soften the edges of the site in time as it matures, creating a separation between public and communal spaces. Boundary treatments for the site will include a brick boundary wall with stone cap and a close board timber boundary fence. Galvanised metal gates will be installed by footpaths leading to the flat entrances.
- 3.6 A new vehicular access to the site is proposed off Abbeyville Avenue with an internal road providing access to the majority of the parking spaces. The proposals aim to provide 23 no. parking spaces which equates to 1 space per unit, with an additional space for visitor parking. 21 of the parking spaces are located at the northern end of the site, whereas off-street parking has been provided for units no. 21 and 22 off Moorland Road. Appropriate turning facilities are provided within the site for delivery vehicles. Bin and bicycle enclosures have also been provided for resident and visitor use. Footpaths are provided across the site in order to provide easy access to the flats and communal areas. The existing bus stop along Moorland Road will be re-located to make room for the parking spaces to serve units 21 and 22.
- 3.7 The proposed residential units will be 100% affordable housing and managed by a Registered Social Landlord.
- 3.8 Aforementioned, landscaping is one of the key themes of the development. A detailed landscaping scheme and green infrastructure statement forms a key component of the proposals presented. The

scheme proposes a communal recreational area at the centre of the development, with additional amenity space provided along the southern and western boundaries. The proposal also utilises a scheme of perimeter landscaping in order to soften the impact of the development.

- 3.9 Ecological enhancements in the form of 2 no. bat boxes, 2 no. house sparrows and 2 no. swift boxes are proposed to be affixed to the building. Their location can be found on the submitted Proposed Site Elevations.
- 3.10 TAN 12 suggests that community safety can be achieved via design solutions that can aid crime prevention. These include providing natural surveillance, improving safety by reducing conflicts in uses, and promoting a sense of ownership and responsibility. It is considered that the site has been developed to reduce concealed areas that are not overlooked including all car parking spaces.
- 3.11 In accordance with Part 1A of the 'Town and Country Planning (Development Management Procedures) (Wales) (Amended) Order 2016' (DMPO 2016), all major developments are required to be subject of statutory pre-application consultation, prior to the planning application being validated by the Local Planning Authority.
- 3.12 A full comprehensive summary of the pre-application consultation is included within the accompanying pre-application consultation report, following responses received by statutory/specialist consultees as well as local councillors, community groups and residents. A formal pre-application has been undertaken with site notices displayed, letters sent to statutory, other and community consultees, along with adjoining residents.
- 3.13 The design team will consider the final energy strategy through future detailed design considering matters such as a fabric first approach and passive design measures to reduce energy demand, installation of photovoltaic panels and installation of low energy lighting and electric vehicle charging points.

Pre-Application Discussions

- 4.1 A non-statutory pre-application was submitted to Neath Port Talbot County Borough Council on 8th October 2024 for the development of 20 no. affordable residential apartment, access, parking, landscaping, drainage and all other associated works. The submission comprised the following documents:
- Pre-Application Form
 - Pre-Application Covering Letter
 - Proposed Drawings;
 - Concept Stage Design Statement;
 - Transport Statement;
 - Ecological Site Assessment; and
 - Marketing Report
- 4.2 A formal written response was issued on 6th February 2025. The response concluded that the principle of residential development was acceptable subject to compliance with relevant LDP policies, with substantial weight afforded to LDP policy SC2 (Protection of Existing Community Facilities). Feedback was also provided in relation to design, parking and highway safety, drainage, biodiversity and land contamination/coal mining. Details were also provided of the likely scope of Section 106 planning obligations and supporting documents required to accompany a future planning application.

Planning Policy Context

Introduction

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

The Development Plan

- 5.6 The development plan comprises Future Wales and the Neath Port Talbot County Borough Council 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.

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.

Delivering Affordable Homes

- 5.15 Page 72 of Future Wales concentrates of the delivery of affordable homes across the country. In order to deliver much needed affordable homes *"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."*
- 5.16 Policy 7 states that *"Through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing".*

Biodiversity and Green Infrastructure

- 5.17 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).
- 5.18 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).

- 5.19 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.*

Regional Connectivity

- 5.20 Policy 12 states that *"The Welsh Government will support and invest in improving regional connectivity. In urban areas, to support sustainable growth and regeneration, our priorities are improving and integrating active travel and public transport. In rural areas our priorities are supporting the uptake of ultra-low emission vehicles and diversifying and sustaining local bus services.*

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.*

Planning authorities must plan the growth and regeneration of the National and Regional Growth Areas to maximise opportunities arising from the investment in public transport, including identifying opportunities for higher density, mixed-use and car-free development around metro stations.

Active travel must be an essential and integral component of all new developments, large and small. Planning authorities must integrate site allocations, new development and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement.

Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points”.

Transport

- 5.21 *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).*
- 5.22 *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).*

National Growth Area

- 5.23 *Swansea Bay and Llanelli are the key focus for growth and investment in the South West region of Wales as outlined in policy 28 of Future Wales. The policy states that “Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The Welsh Government will work with regional bodies and local authorities to promote and enhance Swansea Bay and Llanelli’s strategic role and ensure key investment decisions support places in the National Growth Area and the wider region”.*

Local Level

- 5.24 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.
- 5.25 The following LDP policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
<i>Strategic Policies</i>	
SP1	Climate Change
SP2	Health
SP3	Sustainable Communities
SP4	Infrastructure
SP5	Development in the Coastal Corridor Strategy Area
SP7	Housing Requirement
SP8	Affordable Housing
SP10	Open Space
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
<i>Topic Based Policies</i>	
SC1	Settlement Limits
SC2	Protection of Existing Community Facilities
I1	Infrastructure Requirements
H1	Housing Sites
AH1	Affordable Housing
OS1	Open Space Provision
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
EN8	Pollution and Land Stability
RE2	Renewable and Low Carbon Energy in New Development
TR2	Design and Access of New Development
BE1	Design

National Policy and Guidance

Planning Policy Wales Edition 12

5.26 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.

5.27 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"*.

5.28 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

5.29 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"*.

5.30 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"*.

5.31 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".

5.32 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

5.33 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"*.

5.34 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"*.

5.35 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

5.36 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"*.

5.37 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"*.

5.38 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"*.

5.39 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".

5.40 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"*.

Sustainable Transport

- 5.41 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”.*
- 5.42 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”.*
- 5.43 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

- 5.44 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

- 5.45 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”.*

Housing

- 5.46 PPW highlights the importance of delivering houses. Paragraph 4.2.1 states that *“New housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities”.*
- 5.47 In terms of affordable housing, paragraph 4.2.26 notes that *“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”.*
- 5.48 Affordable housing consists of *“social rented housing owned by local authorities and RSLs and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents. Affordable housing may also include that owned by community-led housing organisations where this meets the Welsh Government’s definition set out in paragraph 4.2.26 above”.*

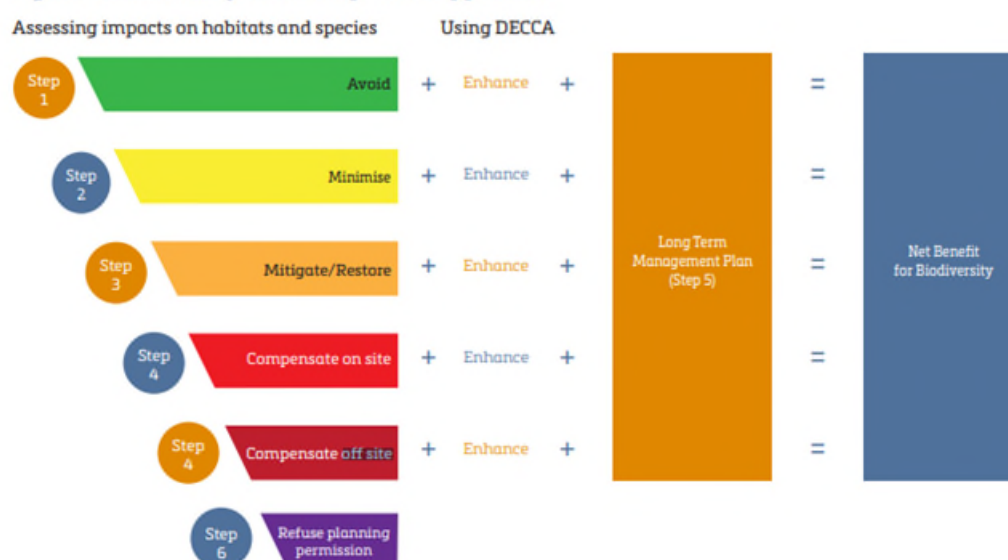
Community Facilities

- 5.49 In terms of community facilities, paragraph 4.4.1 advises that *“Community buildings and spaces provide an important focus for sustaining communities and their well-being. They 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”*.

Green Infrastructure

- 5.50 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”*.
- 5.51 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”*.
- 5.52 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)

- 5.53 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

- 5.54 The following Technical Advice Notes (TANS) are of relevance to the proposed development:
- 5.55 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"*.
- 5.56 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.
- 5.57 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*
- 5.58 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"*.
- 5.59 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

- 5.60 The following Supplementary Planning Guidance (SPG) adopted by Neath Port Talbot County Borough Council is of relevance to the proposed development:
- Planning Obligations (October, 2016);
 - Parking Standards (October, 2016);

- Affordable Housing (October, 2016);
- Biodiversity and Geodiversity (October, 2016);
- Pollution (October, 2016);
- Open Space and Greenspace (July, 2017);
- Renewable and Low Carbon Energy (July, 2017); and
- 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:
- The Principle of Development
 - Loss of Community Facility
 - Design
 - Impact on Visual and Residential Amenity
 - Parking and Highway Safety
 - Drainage
 - Land Contamination and Coal Mining Risk
 - Ecology and Biodiversity
 - Landscaping and Green Infrastructure
 - Energy

The Principle of Development

- 6.3 The proposal seeks demolition of existing public house, and construction of a residential development and associated infrastructure works at the Red Dragon, Moorland Road, Sandfields, Neath Port Talbot, SA12 6JZ. The site is situated within an urban area which is surrounded by residential dwellings and it is viewed as a sustainable and accessible location; within walking distance of several services and facilities including public transport. The site comprises brownfield land within the settlement limits of Sandfields in the adopted Neath Port Talbot County Borough Council LDP, that would represent a suitable development of the site whilst addressing housing need in the area. The proposal is considered to comply with LDP Policy SC1 (Settlement Limits).
- 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 majority of the site is brownfield land, and the proposal will make efficient use of land by providing a use compatible with its surroundings and being located within an accessible and sustainable area.
- 6.6 The development of 22 no. dwellings would provide a valuable contribution in terms of meeting the plan targets as outlined by Policy SP7 (Housing Requirement). The LDP Policy makes provision for 8,760 dwellings during the plan period. Furthermore, Policy SP8 (Affordable Housing) sets out that there is a need to provide 1,200 affordable housing units within the Authority in the plan period. Policy AH1 (Affordable Housing) states that developments providing 3 or more units will be required to contribute to

affordable housing provision, with 25% a minimum target in this instance. The proposal complies with Policy AH1 as it is an entirely affordable housing scheme.

- 6.7 The site is located in a sustainable and its development is considered to produce a mix of residential homes which will create a vibrant community with its own local distinctiveness and sense of place in line with principles established within LDP Policies SC1 (Settlement Limits), SP3 (Sustainable Communities), SP7 (Housing Requirement), SP8 (Affordable Housing), AH1 (Affordable Housing) and BE1 (Design), in addition to the Affordable Housing Supplementary Planning Guidance and Technical Advice Note 2 (Planning and Affordable Housing). In light of the above, the principle of developing the site for a residential use is considered acceptable. As confirmed under subsequent headings, it is considered that the development will not give rise to any significant adverse impacts upon visual and residential amenity, highway safety and several other material considerations whilst providing a contribution to the area's housing land supply requirements.

Loss of Community Facility

- 6.8 The justifying text of Policy SC2 states *"any facility that serves a community purpose can be defined as community facility, including community halls, libraries, local or village shops, public houses and places of worship"*. Accordingly, the Red Dragon Pubic House can be considered a 'community facility'. As highlighted above, Policy SC2 indicates *"any proposals which would result in the loss of an important existing community facility will only be permitted where it can be demonstrated that: the facility is surplus to requirements; or the existing use is no longer viable."*
- 6.9 In order to demonstrate the scheme adherence to Policy SC2, a review of the commercial marketability of the property has been undertaken by B2P Land & Property Consultants, and is submitted as part of this application. The review provides the following pertinent points:
- Given the recent economic pressures and austere budget outlook in general for the UK economy as whole, we are expecting vacancy rates to increase further over the next 12-24 months, and take up levels across the board to drastically reduce. We are expecting the A3 public house sector, in particular those in secondary or tertiary locations, to suffer as the level of disposable income is expected to decline even further.
 - A cursory check online for similar properties in the local vicinity provided 16 no. public houses available within a 5 mile radius of the subject property, 10 properties available within 3 miles and 2 properties available within a mile.
 - The property has been marketed since 1 March 2024. The property has been marketed on a For Sale or To Let basis so as to encompass as wide a range of enquiries as possible. It is still being actively marketed at the present time.
 - To date, we have received a very limited number of enquiries during the marketing period; all of these have been from local individuals enquiring for the rental / asking price. We have not received any viewing requests.
 - Given the age and condition of the building, it is our opinion that the level of investment required to make the building fit-for-purpose to be used as an A3 licenced premises would far outweigh the value of the property. This is evidenced by the lack of enquiries.
 - From conversation with the existing occupier, he confirmed that both turnover and profitability have steadily declined over the last decade as both social and spending habits have changed. They confirmed that the existing business is currently unsustainable.
 - Given the demand experienced to date, and in consideration of the future economic outlook, we have serious concerns over the likelihood of a reputable commercial occupier to be able to sustain adequate trade from the premises in order to secure its long term future under the current use.

- 6.10 Having outlined the key findings of the commercial marketing review, we believe it has been evidenced the existing use is no longer viable. The marketing exercise undertaken has illustrated how there is little commercial interest to retain the property in its current format as a public house. Additionally, the review demonstrates how the continuation of the existing use appears unsustainable, given the sub-optimal economic outlook and difficult market conditions.
- 6.11 It is considered the marketing exercise undertaken by B2P is sufficient to show that reasonable efforts have been made to market the property for sale or lease, for its existing use. Indeed, the property has been actively marketed for over 12 months, with little prospect of a suitable occupier/interested party coming forward to retain the use.
- 6.12 The low number of enquiries referenced in the review points towards the unsuitability of the existing property and floorspace. When combined with a substantial cost to renovate the existing property it becomes apparent why a low number of enquiries have been received. This is also reflected in the lack of enquiries from parties interested in providing an alternative community facility. A property with an inflexible floorspace offer that requires substantial investment is unlikely to be considered an attractive proposition for alternative future uses. Further to the above, the review highlights the current availability of similar properties in the area, again a clear indication that demand for such properties appears very low.
- 6.13 A review of similar facilities in the surrounding area has identified a number of public houses serving the community, which includes the Sand Rabbit Bar & Grill, The Burgess Green PH, The Amazon PH & The Margam Deer. It therefore appears the community is served by adequate provision of similar facilities.
- 6.14 In summary, it is considered the commercial marketing review sufficiently addresses the criteria of Policy SC2 and therefore suggests the loss of such a facility is justified. To conclude, we believe the proposal wholly adheres to Policy SC2 (Protection of Existing Community Facilities).

Design

- 6.15 As discussed in the proposal section, the scheme has been developed holistically considering not only the built form, but also the green infrastructure which forms an integral part of forming a liveable environment. In visual terms the layout and plot density, it is considered that the proposal is appropriate for the area and does not result in an over development of the site. The proposal includes a part two, part three storey block of flats which would be in keeping with the character and appearance of the surrounding area. It is an exciting opportunity for Swansea Developments SPV 1 Ltd to assist with the delivery of affordable and sustainable new homes in an accessible location.
- 6.16 During pre-application discussions with the Local Authority, the following comments were raised:
- Consideration to staggering down the building on the western side of the development from three to two storey, similar to units 1 and 2; and
 - Concerns over the proximity of the parking located on the northern boundary, shared with no. 36a and 36b Abbeyville Avenue.
- 6.17 In response to this feedback, the applicant decided to incorporate the additional parcels of land lying immediately west of the public house and associated parking area. The addition of a further 0.03 hectares of land allowed the inclusion of two further flats to be included that would form a staggered ridgeline to the elevation fronting onto Moorland Road. The stepdown from three storey to two storey on units 21 and 22 which are now included within the proposal mirrors the stepdown at units 1 and 2. The additional parcel of land incorporated into the scheme offers additional amenity space and has resulted in the

parking arrangement being adjusted. Additional planting is proposed at the northern boundary that will provide further screening from neighbouring dwellings.

6.18 Following completion of the pre-application consultation during 2025, the following alterations have been made to the scheme:

- An area of land measuring 5.5m x 12.5m has been removed from the north-west boundary reducing the site area from 0.22 hectares to 0.21 hectares;
- The bike store has been relocated to the south of parking spaces 19 and 20;
- The parking spaces accessed via Abbeyville Avenue have been reconfigured as a result of the omission of land;
- The bin store has been relocated nearer the site entrance off Abbeyville Avenue; and
- Footpath widths within the site have been increased to 1.5m.

6.19 A high-quality palette of materials will ensure a distinctive and attractive finish. Elevation treatments will utilise a combination of brick and cladding, to create definition and contrast. Boundary treatments will comprise brick boundary walls with stone cap and close board timber boundary fence. Tiled roofs with red brickwork walls, in addition to cladding at first floor breaks up the elevations and offers a maintenance free surface.

6.20 The application site is well-related to the existing settlement pattern of Sandfields, with residential properties surrounding the entire site. 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 design, layout and orientation of proposed buildings together with the green infrastructure provision, provides 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 or future residents of the proposed development. The layout ensures that residents of the block of flats are able to easily access the amenity space provided across the site.

6.21 In summary, the proposal is considered acceptable from a design and placemaking perspective by positively contributing to the streetscape, actively encouraging natural surveillance and improving the safety and usability of the active travel link. The addition of new, well-designed homes would result in a positive impact upon the character of the area and would enhance connections with the existing community whilst having no detrimental impact upon the living conditions of existing or future residents. The proposals to deliver 100% affordable housing will make an important contribution to the delivery of affordable homes within the Local Authority. 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. Having considered the above, the proposal is deemed to be in accordance with LDP Policy BE1 (Design) and TAN 12 (Design).

Impact on Visual and Residential Amenity

6.22 The proposed layout demonstrates that the site can be developed whilst maintaining the privacy and amenity of surrounding neighbours. Parking will be located near the boundary of properties along Abbeyville Avenue and Moorland Road in an area currently utilised for the parking of vehicles for visitors to the public house. Appropriate separation distances have been provided in respect of the proposed and existing development, meaning the privacy of neighbours won't be compromised. The proposal is not considered to result in any overlooking or overbearing impact.

- 6.23 The site is located within an urban part of Neath Port Talbot and has road frontage onto two streets. The site is fairly flat, with residential dwellings surrounding the majority of the site's boundaries. The site occupies a prominent position within the street-scene of the area and the development would be visible from nearby locations.
- 6.24 In order to manage the impact of the development upon neighbouring residents, a Construction Environmental Management Plan will be submitted to the Local Authority prior to commencement of any works.
- 6.25 In summary, the proposal has been designed to actively address existing streets and connections. The addition of new, well designed homes would result in a positive impact upon the character of the area and enhance connections with the existing community. Being integrated within an existing community, the proposal has been carefully considered in terms of its effect upon existing resident in terms of residential amenity. For the above reasons, it is considered there would not be a detrimental impact on visual and residential amenity and the proposal complies with LDP Policy BE1 (Design) and TAN 12 (Design).

Parking and Highway Safety

- 6.26 The proposal aims to provide 23 no. parking spaces in total. The quantum of parking equates to 1 space per unit, along with 1 no. dedicated visitor / public parking space. Applying the Parking Standards SPG, a minimum of 22 parking spaces need to be required, therefore the site accords with the relevant parking requirements. A 5.5 metre wide access off Abbeyville Avenue is proposed, extending to 6m that will lead to the majority of the parking bays serving the block of flats. Footpaths measuring 1.5m will be provided across the site to provide easy access to all units and will connect the development with nearby streets.
- 6.27 Aforementioned, the site is well connected to public transport/active travel, reducing the reliance on cars. The existing bus stop along Moorland Road will be relocated in order to make space for parking bays serving units 21 and 22. The bus stop along Moorland Road will continue to provide services to Port Talbot Bus Station. Port Talbot Train Station is nearby and receives a frequent service, with services heading to several destinations including Cardiff Central and London Paddington. There are two active travel links adjoining the eastern and southern boundaries of the site.
- 6.28 A Transport Statement has been prepared by Apex Transport Planning in support of the development proposals. The report provides the following findings and recommendations.
- The site is situated in a highly sustainable location. Potential future residents can walk or cycle to a number and range of facilities, services and schools within appropriate distances via good quality routes, reducing the need to own a car.
 - There are continual and suitable active travel links from the site to the surrounding area, and NPTCBC propose to provide improved active travel links within the vicinity of the site. There are also footways on both sides of the carriageway and well-lit streets within the surrounding area. Walking would therefore be an attractive mode of transport for potential future residents.
 - The site also has good public transport links, which provide a suitable and realistic alternative to travelling by car. This will assist in constraining vehicle generation and reduce the need for residents to own a car. It will also benefit and attract residents that would prefer to travel by public transport.
 - Obtained road safety data does not indicate an existing safety issue which would be exacerbated by the proposals, with just one incident recorded over a seven year period within the vicinity of the site, which did not involve active travel modes.

- The site will be accessed from new dropped kerb crossover arrangement onto Abbeyville Avenue. There is no evidence of an existing safety issue along Abbeyville Avenue and the swept path analysis demonstrates the suitability of the access design. As such this is considered appropriate for accommodating the vehicle movements associated with the proposed development.
- Pedestrian access would be obtained from four points, two from Moorland Road, and two from Abbeyville Avenue which will connect directly to the building from the existing footways. This will suitably encourage walking, by minimising journey distances.
- Parking is provided at an appropriate level (one space per unit plus one visitor space) considering the likely demand for an affordable apartment scheme and is in accordance with the maximum parking standards, through appropriately applying the allowable sustainability reduction. The provision can comfortably accommodate the forecast demand (between 7 and 9 vehicles), as well as accommodate visitors. The provision is also in line with the aspirations of Future Wales and PPW12 in relation to minimising parking. The parking provision enables a less car dominated development to be provided with more green space, improving the quality of the scheme.
- Refuse will be collected on-street from Abbeyville Avenue and Moorland Road with vehicles being able to stop within suitable distances of the bin stores. Access for fire tenders is also appropriate from on-carriageway.
- A robust vehicle trip generation analysis shows that the proposals are forecast to generate 11 - 12 two-way movements during the AM Peak and the PM Peak. This is a minimal level of vehicle movements which would not have a material impact on the operation of the highway or an unacceptable impact on road safety, particularly given the existing public house use would have generated movements on the network.

6.29 As a result of the above, the proposal is considered to align with LDP Policies SP1 (Climate Change), SP20 (Transport Network), TR2 (Design and Access of New Development) and BE1 (Design), along with the Neath Port Talbot Parking SPG, and Technical Advice Note 18 (Transport). The proposal is acceptable in traffic and transport terms, with the highway network has sufficient capacity to accommodate the proposal without any negative effect.

Drainage

6.30 As noted earlier in this statement, the site is not within a flood zone. Regulation, adopted on the 7th January 2019, requires all new developments of more than 1 dwelling house or where construction area is 100m² or more to submit a Sustainable Drainage Systems (SuDS) application demonstrating compliance with the statutory SuDS standards for the design, construction, operation and maintenance of surface water drainage systems serving new developments. It is noted that the drainage strategy for foul and surface water will be developed with regard to Schedule 3 of the Flood and Water Management Act 2010 and will therefore require a separate drainage consent from the Council's SAB Authority.

6.31 The engineering strategy produced by Phoenix Design indicates both foul and surface water are to be disposed of via the combined public sewer. SuDS features are to be incorporated into the design which include raingardens.

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 food 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.

Land Contamination and Coal Mining Risk

6.33 Following receipt of pre-application comments from the Authorities Contaminated Land Department, a Tier 2 Geotechnical and Geoenvironmental Assessment has been produced by Terra Firma. In terms of

coal mining risk, the overall risk to the surface stability of the site from potential unrecorded legacy mining features is negligible and lies within a negligible risk zone from mine gas therefore no mitigation measures are necessary. The ground conditions reveal the site mostly comprises of made ground, clay and sand. The only contamination uncovered of any concern was the elevated levels of arsenic within two of the six samples tested. As the site is classified as CS1 there are no special ground gas protection measures required to be included as part of the construction works. In summary, the proposal accords with LDP Policy EN8 (Pollution and Land Stability).

Ecology and Biodiversity

- 6.34 An Ecological Site Assessment has been undertaken by Ecological Services Ltd and supports this application. There is limited ecological interests on the site as the majority of the site is covered by hardstanding and the building proposed to be demolished. The building to be demolished has been identified as having moderate potential for bat roosts and thereby emergence/re-entry activity surveys were recommended.
- 6.35 Biodiversity enhancements recommended included the creation of habitat corridors through and around the development site to include tree planting, hedgerow planting and the creation of grassland verges. Other enhancements can include sensitive lighting, and hedgehog friendly fencing design.
- 6.36 A Bat Survey was conducted by Ecological Services Ltd in October 2024. The report concluded that during emergence surveys, no bats were observed emerging from the Public House. A very low number of bat calls were recorded and no bats were observed utilising the building. Two bat activity surveys were recommended and the surveys were completed in August and September 2024. In summary, the proposed works to the building won't have a detrimental impact on the local bat population. It does not offer significant hibernation potential for bats and no proof of nesting birds using the building was found. The Bat Survey advised that sparrow nest boxes, swift boxes and bat boxes should be erected in order to comply with Planning Policy Wales Edition 12. The enhancements recommended within the report are to be implemented and their location are shown on the Proposed Site Elevations.
- 6.37 In light of the above, it is considered that the proposals would not have a detrimental impact upon the ecology of the site, subject to satisfactory mitigation measures and ecological enhancements. No trees need to be felled as part of the development, and biodiversity enhancements have been put forward to boost the ecological credentials of the development. 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).

Landscaping and Green Infrastructure

- 6.38 A key aspect of the proposal is ensuring that adequate landscaping and green infrastructure elements are incorporated into the development. The Soft Landscaping Proposals (Drawing Ref: 1264.01A) shows that extensive landscaping works are proposed as part of the development which include native hedge, trees and shrub planting, along with an amenity grassed area.
- 6.39 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.
- 6.40 In terms of Policy BE1 (Design), the proposal adheres to the following point *"It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where*

appropriate". As previously mentioned, the materials proposed for the build will be locally sourced, and a substantial amount of landscaping will be incorporated into the development in order to mitigate its impact. Moreover, the green infrastructure proposals are also considered to be in accordance with the recently updated Chapter 6 of Planning Policy Wales Edition 12.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Swansea Developments SPV 1 Ltd in relation to the proposed full planning application for demolition of existing public house, and construction of a residential development and associated infrastructure works at the Red Dragon, Moorland Road, Sandfields, Neath Port Talbot, SA12 6JZ.
- 7.2 The proposal will result in a modern 100% affordable housing development underpinned by a clear design strategy. The applicant has worked on incorporating feedback provided by the Local Planning Authority during pre-application discussions. 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, and green infrastructure have been considered as part of the proposal.
- 7.3 The proposed development is considered to be acceptable in design terms with a layout that ensures that the built form is offset sufficiently from existing boundaries. The proposed mix of units and modern palette of materials proposed will enhance and have a positive impact on the immediate area. The proposed residential end use is considered to be compatible with prevailing land uses.
- 7.4 There are no highway or pedestrian safety implications associated with the proposed development. The site is accessible by a variety of transport means and not just the private car. The site is deemed to be in a relatively sustainable and accessible location; with several local facilities within walking distance, and a bus stop in close proximity to the site.
- 7.5 The loss of the existing Public House has been justified within this document and in the submitted Marketing Assessment. Evidence has been provided to illustrate that the facility is surplus to requirement and therefore the proposal complies with LDP Policy SC2 (Protection of Existing Community Facilities).
- 7.6 The scheme design has been developed following pre-application discussions with the local planning authority, and undertaking of a formal pre-application consultation. The scheme presented aims to align with the aspirations of the LPA.
- 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. Substantial weight should be afforded in favour of the proposal given it will deliver a 100% affordable housing scheme. Furthermore, 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.