

PLANNING STATEMENT

Land East of Minyrawel, Pen Yr Alltwen, Rhos, Pontardawe

Prepared by LRM Planning Limited on behalf of Ms Dawn
Davies

November 2025



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1 Introduction

- 1.1 LRM Planning is instructed to prepare this Planning Statement to accompany an outline application for residential development of eight dwellings, with approval sought for access, and all other matters reserved on land off Pen Yr Alltwen Road, Rhos, Pontardawe.
- 1.2 This Planning Statement forms part of a suite of drawings and documents produced in support of the proposal. The Planning Statement and accompanying drawings demonstrate the suitability of the site to accommodate the proposed development. The full suite of documents submitted comprises:

DOCUMENT	PREPARED BY	REFERENCE (IF APPLICABLE)
Application Forms	LRM Planning	October 2025
Planning Statement	LRM Planning	October 2025
Site Location Plan	Westfield Architects	448 – AL 0(90)01
Topographical Survey	Westfield Architects	448 – AL 0(90)02
Proposed Site Layout	Westfield Architects	448 – AL 0(90)03
Proposed Site Layout Tree Report Overlay	Westfield Architects	448 – AL 0(90)04
Ecology Site Assessment Survey	Ecological Services Ltd	October 2025
Tree Survey	Treescene	September 2025
Tree Constraints Plan	Treescene	September 2025
Green Infrastructure Statement	Tirlun Design Associates	May 2024
Pontardawe Speed Survey	Road Data Services Ltd	2019

- 1.3 The following sections discuss the site and its context; the proposed development; a summary of pre-application discussions; planning policy context; an appraisal of the development; and a conclusion in respect of the application submitted herein.

2 Site description and context

THE SITE

- 2.1 The site is broadly rectangular in shape, extending slightly to the northeast, and measures 0.33 hectares in area. The site comprises a section of a pastoral field which has a periphery of hedgerows and trees and slopes down gradually eastwards from the highest point in the northwest corner.
- 2.2 The application site is situated along the east of Pen Yr Alltwen Road, to the northwest of Rhos in the County Borough of Neath Port Talbot. More specifically, the site is bounded:
- to the **north** by Pen Yr Alltwen road, which is characterised by a linear arrangement of detached dwellings;
 - to the **east** by dwellings of Maes Y Cornel;
 - to the **south** by the wider field parcel in which the proposed development sits and further dwellings of Penyralltwen Park; and
 - to the **west** by a detached dwelling known as Minyrawel.
- 2.3 Beyond the residential properties to the north and the west, the wider area is predominantly characterised by agricultural land, large sections of woodlands, and scattered detached dwellings. To the east and the southeast of the site, the pattern of residential development continues into the village of Rhos.
- 2.4 There is no established nor consistent residential character within the surrounding area of the site, with dwellings varying in form, massing and design.
- 2.5 The site is constrained topographically, by virtue of the land falling relatively steeply from west to east, from its highest point at the northwestern corner, down by nearly 11m when it reaches the southeast corner.

CONTEXT, CONSTRAINTS AND OPPORTUNITIES

- 2.6 The site is situated 1.7km to the southeast of the town centre of Pontardawe, as defined in the Local Development Plan. Though Rhos does not have a similarly defined centre in the LDP, the site lies 350m west of the primary school, 600m from a convenience store/post office and 900m from the Smith's Arms public house. Pontardawe provides various local amenities and services, including supermarkets, primary and secondary schools, GP practices, a chemist and a post office.
- 2.7 The site is well located in relation to bus services with north and southbound bus stops located 90m east of the site along Neath Road. These bus stops provide services along routes 903, 905, 256 and 56 to Neath, Abercraf, Neath College and Cwmtwrch, amongst other destinations.
- 2.8 Bus route 903 conveniently connects the site to Neath train station which provides direct services to Cardiff, Carmarthen, London Paddington, Swansea and other local, regional and national destinations.

FLOODING

- 2.9 The new Natural Resources Wales (NRW) Flood Maps for Planning show the site to fall within a flood zone 1 area which signifies areas at little or no risk of flooding from rivers, the sea, and surface water in a given year including the effects of climate change. Similarly, there is no flood risk shown on the NRW mapping for surface water and small watercourses.

HERITAGE

- 2.10 The site is not within close proximity to any heritage assets including conservation areas, listed buildings, scheduled monuments, or historic parks or gardens. The nearest scheduled monument is Penyralltwen burial chamber, some 250m east-southeast of the site. The nearest listed asset is within Rhos, in the form of the grade II-listed fingerpost on Neath Road/Plas Road situated opposite the post office, around 500m due east of the site.

ECOLOGY

- 2.11 In terms of ecology, the site sits within close proximity to a number of protected sites. Specifically, the falls within the northeastern corner of the Fferm Alltwenganol Site of Importance for Nature Conservation (SINC) and is less than 1km away from five other SINCs, one Site of Special Scientific Interest (SSSI), and four sites of Ancient Semi Natural Woodland (ASNW).

PLANNING HISTORY

- 2.12 There remains a live full planning application for the site, submitted by LRM Planning on behalf of the same applicant and registered under planning reference P2018/1032. This proposed eight split level dwellings, with associated highway works. The application has been repeatedly delayed for various reasons, leading the applicant to submitting an outline application, in order to secure the principle and allow the layout to be agreed under a future reserved matters application.
- 2.13 The following sections demonstrate the differences between the extant full application and this outline submission.

3 Proposed development

- 3.1 This application seeks outline planning permission for residential development on land located along Pen Yr Alltwen Road, to the northwest of Rhos, Pontardawe. All matters are reserved for future consideration, except for access, which is to be determined under this application. As set out above, this outline application follows an earlier submission of a full planning application by the same applicant and development team for this site that remains undetermined, so there are some similarities between that application and the one currently being submitted.
- 3.2 Access to the site is proposed via a new junction on Pen Yr Alltwen Road, located along the site's northern boundary. The proposed design sees access gained from the northeastern corner of the site, with the road continuing southwest down the site. A turning head is proposed around two-thirds of the way down the road.
- 3.3 The access road has been informed by specialist advice from a transport consultant and takes account of tree and ecological constraints. It achieves the required visibility splays in both directions in accordance with the 20-mph speed limit specified in Technical Advice Note 18 (TAN 18), published by Welsh Government, and also meets pedestrian visibility requirements.
- 3.4 The updated tree survey and tree constraints plan by Treescene, and updated ecological surveys carried out by Ecological Services have resulted in changes to the site layout in comparison to the previous application. Primarily this has resulted in greater distance from the existing northern vegetation line and the proposed plots. Updated ecological surveys undertaken in September 2025 revealed that the site forms part of the Fferm Alltwenganol SINC and contains species-rich neutral semi-improved grassland and important tree lines. These ecological constraints have directly informed the design of the proposed access road arrangement and ensures the revised layout provides sufficient space for mitigation.

4 Planning policy framework

- 4.1 The planning policy context for the determination of this application is provided by national and local planning policy guidance. National guidance is set out within Future Wales, Planning Policy Wales and its accompanying Technical Advice Notes. Local policy comprises the adopted Neath Port Talbot Council Local Development Plan (adopted 2016), and its supporting Supplementary Planning Guidance (SPG) documents.

FUTURE WALES: THE NATIONAL PLAN 2040

- 4.2 Future Wales is the top-tier national development framework, produced by Welsh Government. It is a strategy for addressing key national priorities through the planning system over the next two decades, 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.

PLANNING POLICY WALES

- 4.3 Planning Policy Wales (PPW) is the principal national planning policy document which sets out the land use policies of the Welsh Government (WG) against which development proposals should be assessed. The latest version is the twelfth edition, published in February 2024.
- 4.4 The main thrust of PPW is to ensure that the planning system contributes towards sustainable development and improves the social, economic, environmental, and cultural well-being of Wales. Placemaking lies at the heart of PPW, with policy and development management decisions required to seek to deliver development that adheres to these principles.
- 4.5 Figure 4 of PPW covers the Key Planning Principles of WG in seeking to achieve “*the right development in the right place*”. Development proposals must seek to deliver development that addresses these outcomes, albeit paragraph 2.20 recognises that not all of these outcomes can necessarily be achieved under every development proposal.
- 4.6 Paragraphs 3.3 to 3.18 of PPW highlight the importance of good design in “*creating sustainable places where people want to live, work and socialise*”. To achieve good design development, proposals need to meet the five overarching aims of design which comprise of access, character, community safety, environmental sustainability, and movement.
- 4.7 Section 6 of PPW sets out green infrastructure and how it can be integrated into developments, which should be protected and enhanced due to the multi-functional roles. A proactive approach to green infrastructure and biodiversity should be adopted to help reverse the decline in biodiversity and increase the resilience of ecosystems.
- 4.8 Paragraph 6.2 relates to Green Infrastructure and notes that “*at a local scale, [green infrastructure] might comprise parks, fields, public rights of way, allotments, cemeteries and gardens. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.*” Green infrastructure provides multiple benefits for social, economic, and cultural as well as environmental resilience. These benefits are important in domestic environments where they can facilitate health and well-being related benefits.

TECHNICAL ADVICE NOTES

- 4.9 The following Technical Advice Notes (TANs) are of relevance in the consideration of these proposals.

- 4.10 TAN 12 relates to Design and was updated in March 2016. It provides advice and information on a number of related areas including the definition of design for planning purposes; design considerations in planning decisions; and local planning authority design policy and advice.
- 4.11 TAN 18, which was published in March 2007, deals with Transport matters, and advocates locating development where there is good access by public transport, walking and cycling, generally advocating development at sustainable sites.

WELL-BEING OF FUTURE GENERATIONS ACT

- 4.12 The Well-being of Future Generations Act 2015 imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principles, and to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Its content is sought to be delivered through the planning system via the intertwining of the Act through all subsequent versions of PPW published since the Act was passed.

LOCAL DEVELOPMENT PLAN

- 4.13 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. The development plan for the site comprises the Neath Port Talbot Council Local Development Plan (2011-2026).
- 4.14 The site is within the settlement limit for Rhos, as defined by the Neath Port Talbot Council Local Development Plan. This site is not subject to any designations. It can therefore be classed as 'white land', whereby the principle of development on this site is acceptable, subject to material planning considerations.
- 4.15 Policies with a prefix of SP (strategic policies) are overarching policies relating to development in the county borough. Policy SP3 (Sustainable Communities) notes that the delivery of sustainable, healthy and cohesive communities will be promoted by defining sustainable communities and locations for development by a settlement hierarchy that reflects the role and function of settlements. The policy also identifies settlement limits within which development that accords with the settlement hierarchy will be permitted in principle.
- 4.16 Linked to the above is policy SC1 (Settlement Limits) which confirms development that is proportionate in scale and form to the role and function of the settlement will be acceptable in principle within settlement limits.
- 4.17 Policy BE1, Design, emphasises the importance that a new development achieves and creates attractive and safe places. It sets out a series of criteria that are sought to be achieved on new development proposals. This includes considerations of character, context, materials, highway safety, local features, security, transport connectivity, use of resources, drainage and layout.
- 4.18 A summary of the pertinent LDP policies is provided below, listed in the order they appear in the LDP.

LDP POLICY RELATING TO

STRATEGIC POLICIES

SP1	Climate Change
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SP3	Sustainable Communities
SP6	Valleys Strategy Area
SP7	Housing Requirement
SP10	Open Space
SP15	Biodiversity and Geodiversity
SP16	Environmental Protection
SP20	Transport Network
SP22	Welsh Language
TOPIC BASED POLICIES	
SC1	Settlement Limits
AH1	Affordable Housing
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
EN8	Pollution and Land Stability
W3	Waste Management in New Development
TR2	Design and Access of New Development
BE1	Design

SUPPLEMENTARY PLANNING GUIDANCE

4.19 In addition to the above policies, the following SPGs are considered of relevance to this application:

- Planning Obligations (Oct 2016);
- Affordable Housing (Oct 2016);
- Biodiversity and Geodiversity (May 2018);

- Parking Standards (October 2016); and
- Design (July 2017).

5 Appraisal

OVERVIEW

- 5.1 This section of the Planning Statement aims to identify the main issues relevant to the determination of the application and seeks to assess the scheme against the pertinent considerations.
- The **principle of the development** of this site in land use policy terms.
 - The proposed **access** arrangements.
 - The impact of the proposed development in respect of **trees, biodiversity** and **ecology**.
 - Other considerations including **sustainable drainage, flooding** and **design**.

PRINCIPLE OF THE DEVELOPMENT

- 5.2 The principle of the development is established by the virtue of the site's location within the defined settlement limits, governed by LDP policy SC1 and the residential nature of the site context. The site provides a valuable contribution towards wider housing need of NPT in a sustainable, well-connected location in accordance with key principles of PPW. LDP policy SP6 addresses development in the Valleys Strategy Area, within which the wider area of Pontardawe is identified as a Strategic Growth Area. This residential development within that area therefore accords with the policy requirements of the LDP.
- 5.3 Additionally, this site is able to provide a contribution towards meeting housing targets within the Local Authority, as governed by policy SP7. The latest Annual Monitoring Report (AMR) available online, published in October 2023, identifies that the delivery of housing across NPT falls behind the annual target set out in the Local Development Plan, with only 41% of the cumulative annual target having been delivered by the time of the publication of the AMR. This is a substantial shortfall, and though this site is small in size, it will evidently contribute to addressing some of the shortfall.
- 5.4 Though design considerations will not come into play at outline stage, LDP policy BE1 (design) stipulates density requirements within its criteria-based requirements. The Valleys Strategy Area has a target minimum density of 30 dwellings per hectare (dph). Although this site, at just over 24dph, falls short of the policy requirement, this is justifiable for a number of reasons. Firstly, the steeply sloping topography means that the development must address a fall of some 11m from the highest to lowest points on the site. Secondly, there are multiple existing green infrastructure assets on site, not least the existing vegetation, which is sought to be retained to avoid unnecessary tree loss. Finally, the existing built form in the existing context is befitting of an edge-of-settlement setting, wherein slightly lower density development is more in keeping with the vernacular, in comparison to high density development.

ACCESS

- 5.5 Access to the site remains largely unchanged from that which was proposed under the earlier full planning application for the site, referenced P2018/1032. This was designed by experienced transport consultancy Apex Transport, and was informed by speed surveys, which were carried out in 2019. Given that speed limits in built-up areas in Wales have been subject to the 20-mph speed limit initiative since September 2023, it is unlikely that speeds in the site vicinity will have increased since the time of the survey.
- 5.6 The access arrangements were heavily scrutinised by the Highways Authority under the 2018 planning application, in the context of LDP policy TR2. Given that both the principle and detail were

agreed at that time, it is considered likely that the Highways Authority will arrive at a similar conclusion on this occasion.

TREES AND LANDSCAPE

- 5.7 An updated tree survey and tree constraints plan, carried out by Treescene in September 2025, shows that the site contains two category A trees along the northern boundary, a mixture of Category B and C trees grouped around the north, west and eastern boundaries, as well as two category U trees to the north and east boundaries. The site access avoids the removal of any Category A trees and limits tree loss to three trees, comprising of two Category B specimens and one Category C. This approach balances impact on trees and biodiversity against the need to provide a safe access for the site.
- 5.8 The two visitor car parking spaces on site are located within root protection areas (RPAs) for Category B trees on the eastern boundary. These parking spaces are set to be constructed at a higher ground level than the RPAs, meaning minimal, if any impact arising.
- 5.9 Though the layout is subject to agreement at reserved matters stage, plot 01 has been relocated from the earlier full planning application to ensure it lies outside of the RPA for the Category A Beech tree referenced T10. Similarly, plot 02 has been sited outside of the RPA for the Category A Oak referenced T6, in comparison to its siting under the full planning consent.
- 5.10 The layout ensures the retention of all Category A trees and the vast majority of Category B trees. This will ensure that impact to the existing landscape is kept to a minimum. The landscaping scheme that would be submitted with any subsequent reserved matters application would be able to secure additional planting in suitable locations along the site boundary to compensate for these minimal losses, and would demonstrate compliance with LDP policies SP16, EN7 and national policies.

BIODIVERSITY AND ECOLOGY

- 5.11 The site is comprised of pastoral fields with boundary vegetation and trees to the north, east and west. The updated ecological site assessment survey confirms that the development site forms the northeastern pocket of the Fferm Alltwenganol SINC. Mitigation for loss of existing SINC habitat will be able to be secured via a detailed scheme of habitat compensation and mitigation to be submitted with a future reserved matters application. This will ensure compliance with LDP policies SP15 and EN6, as well as national policy requirements.
- 5.12 The site has potential for use by reptiles. To ensure minimal impact on any such possible populations, vegetation clearance should take place during the months of April to September. The ecology report also contains other mitigation measures and enhancements, including the provision of bat and bird boxes, hedgehog fencing, and the use of native species in any planting proposals. These elements will be secured under a reserved matters application.

OTHER CONSIDERATIONS

- 5.13 **Sustainable drainage** – The applicant acknowledges the requirement for sustainable drainage systems (SuDS) in accordance with current legislation. Appropriate SuDS measures will be integrated into the site design and brought forward as part of a future reserved matters application. A separate application will also be submitted to the Sustainable Drainage Approval Body for approval in due course.
- 5.14 **Design** – By nature of this application being made in outline, matters of appearance, landscaping, layout and scale will be determined under a future reserved matters application. Notwithstanding this, the layout submitted demonstrates that the site is able to accommodate eight dwellings, whilst being respectful of existing green infrastructure assets including mitigation measures; and also

ensuring safe access to the site. A Green Infrastructure Statement is submitted herein, with its stipulations subject to agreement under a future reserved matters application.

6 Conclusion

- 6.1 This Planning Statement has been prepared in support of an outline planning application for residential development of eight dwellings on land east of Minyrawel, Pen Yr Alltwen Road, Rhos. All matters are reserved except for access, which is to be determined as part of this application.
- 6.2 The proposals follow an earlier full planning application that is yet to be determined, thus it is hoped this application for outline consent will be more straightforward and able to be supported. The principle of residential development is acceptable due to the location of the site in a sustainable location within the defined settlement limits. The proposed access has been carefully designed in accordance with relevant national and local planning guidance, technical advice, as well as updated ecological and arboricultural surveys.
- 6.3 Design aspects of the development will be addressed through future reserved matters submissions. These will ensure a high-quality scheme that respects the amenity of neighbouring properties, protects and enhances green infrastructure and biodiversity, and contributes positively to the character and appearance of the area. Notwithstanding that detail, the layout submitted demonstrates how a compliant scheme of eight homes would be able to be achieved. There are no technical constraints to development, and sustainable drainage approval will be able to be achieved via the careful consideration of this layout.
- 6.4 Wellbeing goals of the Well-being of Future Generations Act (WFGA), as intertwined in PPW 12, are adhered to through this application as discussed in section 6. This concludes that there would be no significant or unacceptable impacts upon the achievement of wellbeing objectives, nor at a detriment to future generations, as a result of this development being carried out. This also seeks to ensure that decision-making helps to prevent problems occurring or getting worse.
- 6.5 In conclusion, the proposed development represents a sustainable and appropriate use of land within the settlement limits, contributing to an increasing local housing need. The site benefits from good accessibility and connectivity to services and public transport. As such, the proposals comply with local and national planning policy and offer the opportunity to deliver new homes in a suitable location. It is therefore respectfully requested that Neath Port Talbot County Borough Council supports this outline application.

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