

26 November 2025

Our Ref: CJD.LPC.5536

Ms Jessica King
Planning Services
Neath Port Talbot County Borough Council
The Quays
Brunel Way
Baglan Energy Park
Neath
SA11 2GG

Dear Ms King

1 Henfaes Road, Tonna, Neath, SA11 3DX

“Demolition of existing listed building on site, including the outbuildings and erection of 8no. dwellings (6no market and 2no affordable), with associated highway, landscaping, drainage and infrastructure works.”

Application for Planning Permission and Listed Building Consent

On behalf of my client I wish to make a revised Planning Application and Listed Building Consent submission for the above proposal.

You will be aware that a previous proposal for a similar scheme (Applications P2024/0817 & P2024/0818) was withdrawn on 18th March 2025. Further to the withdraw we continued constructive dialogue with the Council via the Pre-Application process (including meetings) and on 29th September 2025 received a helpful written response (Q2025/0220). This helpful process has assisted greatly in informing this current submission.

In order for the submission to be registered I am pleased to enclose the following:

- Completed Application Form
- Design & Access Statement
- Access Statement
- Heritage Assessment
- Heritage Assessment – TAN24 Issues
- Reinstatement Cost Plan
- Demolition Methodology
- Structural Survey
- Transport Statement
- Designers Response to Active Travel Observations
- Designers Response to Highways
- Flood Consequences Assessment
- Site Investigation Report
- Arboricultural Report
- Preliminary Ecological Appraisal

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- Green Infrastructure Statement
- Ecological Management Plan
- Package of Application Drawings:
 - 1566 001 A Site Location Plan
 - 005 A Site Plan as Existing
 - 010 A Site Sections as Existing
 - 015 A Dilapidated Main House Elevations as Existing (Sheet 1of2)
 - 016 A Dilapidated Main House Elevations as Existing (Sheet 2of2)
 - 026 C Site Plan as Proposed (Ground Floor Plans)
 - 027 C Site Plan as Proposed (First Floor Plans)
 - 028 C Site Plan as Proposed (Roof Plan)
 - 035 D Site Sections as Proposed
 - 036 A Site Entrance as Proposed
 - 045 C Plot 1 Proposed Floor and Roof Plans
 - 048 C Plot 2 Proposed Floor and Roof Plans
 - 049 C Plot 3 Proposed Floor and Roof Plans
 - 050 C Plot 4-5 Proposed Floor and Roof Plans
 - 052 C Plots 6-8 Proposed Floor and Roof Plans
 - 055 C Plot 1 Building Elevations Sheet 1 of 2
 - 056 C Plot 1 Building Elevations Sheet 2 of 2
 - 057 C Plot 2 Building Elevations
 - 058 C Plot 3 Building Elevations
 - 059 C Plot 4 & 5 Building Elevations
 - 061 D Plot 6 Building Elevations
 - 062 B Plots 6-8 Typical Illustrative Bike Shed Elevations
 - 063 A Plots 7-8 Building Elevations

Site Description and Proposal

The existing site, comprising some 0.64 ha is located in Tonna, a village situated approximately 2 miles north-east of Neath. To the north west is Henfaes Road, which is an attractive suburban street fronted by large, detached properties. To the north-east is a detached bungalow, a large detached dwelling lies to the south-west and to the south the site adjoins part of a larger estate constructed known as The Paddocks.

The site is largely overgrown and contains a number of dilapidated structures, the largest being the former house known as Tyn Yr Heol which is located centrally on the main part of the plot. This building is Grade II listed and is understood to date from c.1800 with later extensions added in the 1920s. This main building is seriously dilapidated, covered in ivy and is missing its roof. Remnants of three stone outbuildings lie to the north-east and to the south of the main house, all have collapsed and have also been taken over vegetation.

The remaining dilapidated structures on the site are considered beyond economic repair. Accordingly, the proposal is to demolish these and erect eight new dwellings. To inform the preparation of the scheme rigorous work has been undertaken to; a) appraise the remaining structures from a Heritage perspective, b) understand the local Urban context, c) have appropriate information regarding the Arboricultural situation at the site and c) fully understand the Ecological context at the site. This

rigorous assessment has resulted in a scheme of eight detached dwellings. Vehicular access will be via an existing access onto Henfaes Road. The overall Design Ethos of the proposal is the reinstatement of the street scene by introducing a new, sustainable frontage building of a similar size to the existing property, together with an additional seven dwellings carefully located in the site in a bespoke manner. Vehicular access will be via an existing access onto Henfaes Road, which will be altered to facilitate the development.

The site comprises urban land falling within the Settlement Limit for the locality as defined in the Development Plan Proposals Map.

Planning History

My understanding from examining the Planning History records is that the following permissions have been granted in the past.

N1993/0429 – Proposed 52 Bed nursing home – Condition approval 02/12/93.

N1993/0593 – Proposed 52 bed nursing home (reserved matters) - Conditional Approval 20/01/94.

N1994/0572 - Proposed 52 bed nursing home (reserved matters) - Conditional Approval 20/01/94.

P1998/1256 – Continuation without complying with condition 1 (Time Limit) of consent N1993/0429 – Conditional Approval 17/12/98

P2024/0817 & P2024/0818 – Demolition of existing buildings and erection of 8 dwellings – Withdrawn 18/03/2025.

Development Plan Policy Position

From my evaluation of the Development Plan policy framework the relevant planning policy context for the consideration of this proposal is set out in the following key documents.

Neath Port Talbot Local Development Plan (2011 – 2026) Adopted 2016

The Local Development Plan, represents the Council's primary strategic planning document. The relevant policies affecting the site are as follows:

Strategic Policies

Policy SP3 Sustainable Communities

Policy SP7 Housing Requirement

Policy SP8 Affordable Housing

Policy SP10 Open Space

Policy SP21 Built Environment and Historic Heritage

Policy SP22 Welsh Language

Topic Based Policies

Policy SC1 Settlement limits
Policy AH1 Affordable Housing
Policy OS1 Open Space Provision

Policy EN6 Important Biodiversity and Geodiversity Sites
Policy EN7 Important Natural Features
Policy TR2 Design and Access of New Development
Policy BE1 Design.

Supplementary Planning Documents (SPD)

The relevant SPD documents for the determination of this application are:

Planning Obligations (October 2016)
Parking Standards (October 2016)
Affordable Housing (October 2016)
Biodiversity and Geodiversity (May 2018)
Pollution (October 2016)
Open Space & Greenspace (July 2017)
Renewable and Low Carbon Energy (July 2017)
Design Checklist SPD (Adopted) 2007
Residential Parking Standards SPD (Adopted) 2013
Waste Collection Guidance for New Developments SPD (Adopted) 2015
Historic Environment (2019)
Development and the Welsh Language (2017)

National Planning Policy and Guidance

National Policy which is relevant to the determination of the application is as follows:

- Planning Policy Wales (Edition 12) - 2024
- Technical Advice Note (TAN) 2: Planning and Affordable Housing (2006)
- Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009)
- Technical Advice Note (TAN) 12: Design (2016)
- Technical Advice Note (TAN) 15: Development and Flood Risk (2004)
- Technical Advice Note (TAN) 18: Transport (2007)
- Technical Advice Note (TAN) 24: The Historic Environment (2017)

Key Planning Issues

In order to assist your consideration of this submission I would like to offer the following commentary on the key planning issues raised.

Principle of Development

Given the location of the site within the Settlement Limits as defined on the Development Plan Proposals Map, the principle of new residential development is acceptable in accordance with Policy SC1.

We have been mindful in preparing this submission of the need to achieve an appropriate site density having regard to the contents of Policy BE1, and the supporting text at paragraph 5.5.14 which recognises that significant constraints associated with a site will be taken into account when determining an appropriate density. This issue is fully evaluated within the submitted Design and Access Statement with the following extract setting out the pertinent analysis;

The overall site area within the applicant's ownership amounts to some 0.64ha. However there are a number of physical and environmental constraints that significantly limit the extent of development achievable upon the site including:

- *root protection zones for both the TPO trees and existing trees worthy of retention,*
- *the 6m easement across the site required for existing and proposed foul drainage connections,*
- *perimeter land to provide an ecological buffer and continuous habitat*
- *other unusable strips of land not capable of development.*

The position of the TPO trees on site together with the street character and heritage value attributed to the existing boundary wall also limits vehicular access point resulting which also drives the development pattern on site. The diagram left (Fig. 13) Indicates a total net developable area of 0.3 ha.

The submitted proposal delivers 8 new dwellings providing a density of 26 dph. Given the nature of the site and the above constraints we consider this to be an appropriate density.

We are also mindful that Policy AH1 states, "All new housing developments, including conversions, on sites accommodating 3 or more units will be required to contribute to affordable housing provision. Affordable Housing Percentage Targets will be sought in the following spatial areas. Coastal Corridor: Neath - 25%." To comply with Policy AH1 it is proposed that Plots 7 and 8 (which are two bedroom dwellings) will be allocated as Affordable Housing.

The principle of the new housing proposed, within this sustainable urban location is therefore clearly acceptable, and an added material benefit of the scheme will be the provision of Policy compliant Affordable Housing.

Design / Heritage Impact

Included with the submission is a detailed Heritage Assessment (and this also needs to be read in conjunction with the accompanying Structural Survey, Demolition Method Statement and Reinstatement Cost Plan). The Heritage Assessment evaluates the redevelopment scheme proposed from a Heritage perspective with the following being pertinent extracts from the assessment;

This report demonstrates that the surviving elements of the building embody little of any special architectural or historic fabric/interest. The standing remains which are in a dangerous condition, show that there are no historic features which have survived and the ruins do not portray a complete or intact example an elegant house of status, as per the list description.

The fire destroyed the historic interior and its detailing, fabric and roof coverings and was so extensive that it caused the collapse of the internal structures including the staircase, roof and floors. The additional weight of fallen debris and material damaged sections of basement vaulting causing further loss fabric. The outcome of the fire was the loss of all significant internal features which was to the detriment of the Site's architectural interest and this has been further eroded over time by the wind and weather and vegetation growth. The features which do survive, date from the C20 (steel floor beams), whilst door and window openings are devoid of architectural detail/mouldings and thus have very little historic value or merit.

Due to the exceptional circumstances of this Site, and in light of further robust assessment, it is apparent the standing structures are beyond viable repair and restoration, although the Site offers an opportunity for sensitive redevelopment and enhancement of the local area. The proposed redevelopment is sympathetic and is one based upon the manner in which Tyn Yr Heol House addressed the street. The proposed scheme would achieve a beneficial reuse of the Site, removing the blight to the wider community by providing housing, a use that this Site has historically been associated with.

In addition, a specific document is included title, "Heritage Assessment – TAN 24 Issues" which articulates how the three criteria in paragraph 5.15 of Technical Advice Note (TAN) 24 are all met, with the following being the salient conclusion;

TAN24 requires that where alternative proposals for a site are to considered, including replacement buildings, then the merits of the design of such schemes including whether the loss of any listed building would be outweighed by the benefits for the community that may arise. This reports demonstrates that the proposals to redevelop the Site which includes the demolition of the listed building is one which is meets the criteria set out in TAN24 para 5.15.

In summary, the redevelopment scheme proposed is entirely appropriate given the poor physical condition of the structures on the site, and the design advocated is entirely sympathetic to the historic context of the site.

Design

Included with the submission is a detailed Design and Access Statement, which in partnership with the submission drawings comprehensively explains the rationale for the design, and how the scheme will create a bespoke, carefully considered design which is tailored to the site's characteristics and constraints. The scheme design has been informed by rigorous site analysis in terms of the existing site characteristics, with the dwellings designed to fit comfortably taking into account the existing vegetation and ecological constraints.

The following extract from the Conclusion aptly summarises the schemes Design merits:

The existing property comprises a large, overgrown plot measuring approximately 0.64 ha. The site contains a number of dilapidated structures that, over time, have been reclaimed by nature and, whilst listed, have clearly been demonstrated to be beyond economic repair.

These buildings continue to deteriorate and are now considered to be dangerous structures, representing a health and safety risk to anyone venturing onto the property.

The site also contains a number of significant TPO trees that contribute positively to the street scene and the wider landscape setting of the site. At the same time they also present significant constraints to the development layout. The proposed development of the site carefully balances the potential impacts with the many site constraint and the desire to create an attractive, sensitive and bespoke, enclave development.

The proposals have been developed in response to the unique and challenging environmental, physical and broader contextual constraints imposed by this site.

Drawing upon an analysis of the local and wider context the proposals reference traditional materials and forms whilst creating a bespoke, 'contemporary vernacular' that is sympathetic to its setting.

These proposals are therefore considered to represent a high quality exemplar development appropriate to the site and offer an opportunity to provide the following public benefits:

to re-establish the historic street scene with a sustainable, appropriately scaled new dwelling,

to provide seven additional new high quality sustainable homes adding add to local housing stock,

A key element of our design objective has been to embrace sustainable construction principles.

In this respect the building forms have been orientated to facilitate the introduction of photo-voltaic panels on south-east and south-west facing roof slopes. It is anticipated that these will be combined with the use of air source heat pumps together with high levels of thermal insulation and airtightness to achieve required low energy / net zero carbon standards. Existing stone and bricks arising from demolitions on site will be assessed for reuse and, where viable, be utilised in the construction of new boundary walls and buildings.

We do believe that the design principles advocated by this scheme are an appropriate response to the redevelopment of this site, creating an extremely high standard of design which will be beneficial to the overall visual amenities of the locality.

Residential Amenity

The site is located within a predominantly residential area with properties located to the north, east, south and west of the site. The scheme layout has been purposefully designed to respect this relationship, and the configuration of the proposed dwellings ensures that that no harmful loss of privacy or overbearing impact issues will occur to these existing properties.

Transport

Included with the submission is a comprehensive Transport Statement evaluating all Transportation issues associated with the scheme. In addition two documents are also included which explain how the comments received by the Highway Authority and Active Travel in respect of Applications P2024/0817 & P2024/0818 have been addressed.

To create a suitable vehicular access, an existing access point onto Henfaes Road western boundary will be widened slightly to provide adequate visibility in both directions. A new access road, 5.5m in width, and turning head will be provided to adoptable standards allowing sufficient space for cars and service vehicles to pass. Refuse and emergency vehicles will be able to enter the site and leave in forward gear. The road layout facilitates full kerbside collection of household and recycled waste with carry distances being within acceptable limits.

The following summary points from the Transport Statement articulate how all Transport issues are satisfactorily addressed:

The proposal is for 8 dwellings with associated parking and access on land formerly occupied by a care home that has long since closed. The site access is from the same location as the former care home access but is improved to

allow two-way traffic. The access complies with visibility standards for a 30mph speed limit. The speed limit has been 20mph since September 2023.

The access road is to adoptable standards with 5.5m width and footway and service strips and can accommodate refuse vehicles and fire tenders including allowing these vehicles to turn within the site. The access road includes lighting and drainage to adoptable standards.

There is a private parking square and turning area for plots 2,3 and 4. 22 car parking spaces have been provided within the development serving the individual plots and 2 visitor parking spaces have been provided within the adoptable highway area.

The traffic generation of the site is forecast to be 4 vehicles two-way in the peak hour (both AM and PM) and 36 vehicles two way over a 12-hour day. Even at its peak the site will only generate one vehicle movement every 15 minutes.

The site is served by a regular bus service that links the Vale of Neath with Neath Town Centre and Swansea City Centre. Neath Town Centre is a ten-minute journey from the site.

The towpath of the Neath Canal is a recognised multi-user trail and can be reached via a short (300m) walk or cycle ride from the site. This trail leads to Neath Town Centre, and also to Briton Ferry and the Vale of Neath as far as Ysgwrfa.

There is a local primary school and grocery store accessible on foot from the development. All facilities are available in Neath Town Centre which is a ten-minute bus journey from the site.

Overall, the site is very accessible by non-car modes and has negligible traffic impact on the local highway network.

Arboriculture

A key characteristic / constraint of the site is the presence of existing vegetation which includes a number of trees subject to a Tree Preservation Order (TPO), in addition to many others of less significant quality. These have all been thoroughly analysed with the results included in the submitted Arboricultural Report. Thereafter, the layout has been designed to respect the root protection areas of the TPO and the Category B / C trees identified in the Arboricultural Report.

These mature trees, along with others, where providing a positive contribution to the setting and habitat, will be retained, whilst low quality trees will be removed. The proposals indicate the removal of several category 'U' trees which are in poor condition, together with 5 additional category B & c trees to facilitate development.

The layout facilitates the planting of 23 new trees to replace those lost. New managed, soft landscaped buffer planting will be introduced along the southern and eastern perimeters of the site to provide continuous habitat and additional screening.

The above approach will ensure that the existing green characteristic of the site is reflected in the proposed layout, and the good quality trees which are to be retained will create a highly attractive landscape framework for the development.

Ecology

Having regard to the current overgrown nature of the site we have been mindful that Ecology is an important issue which needs to be examined and addressed. Accordingly, a comprehensive Ecological Appraisal has been undertaken together with bat surveys. This work has informed final Ecological Appraisal, Ecological Management Plan and Green Infrastructure Statement which are included with the submission. This detailed assessment work has informed the scheme, whereby the proposals have been designed to enable the delivery and integration of appropriate Ecological mitigation and enhancement measures.

Coal Mining

We acknowledge that the site is located within a High Risk Coal Area. Accordingly, a Coal Mining Risk Assessment accompanies the submission together with a Land Contamination Assessment. These documents demonstrate that there are no prohibitive coal mining risks or contaminated land issues associated with the development of the site.

Section 106 Planning Obligations

As indicated earlier two of the Plots are identified as the Affordable Housing units. With regard to Public Open Space, the Pre-Application response indicated an eight dwelling scheme will generate a contribution requirement of £17,736.

If the above S106 Planning Obligation requirements can be confirmed at an early stage of the assessment process, we will thereafter liaise with you to complete the Section 106 Planning Obligation to facilitate the release of the Planning Permission.

Conclusion

I do trust the commentary within this Support Planning Statement, together with the comprehensive range of associated documents, demonstrates the meticulous manner in which this scheme has been prepared with rigorous appraisal and evaluation of all the issues involved.

We have fully acknowledged the heritage sensitive issues associated with the removal of the remains of the listed buildings, and thereafter the scheme has been devised in a careful manner to achieve an efficient density whilst being sensitive to the site's constraints.

The transport, arboricultural and ecological constraints have been fully acknowledged, with a bespoke design creating an extremely visually attractive form of development.

It is therefore entirely appropriate that Planning Permission and Listed Building Consent should be granted for this proposal. Should you require any assistance during the assessment period please do not hesitate to contact me.

Yours sincerely

Chris Dance
LPC (Trull) Ltd
Director

cc Client
 Consultant Team