PLANNING STATEMENT AND JUSTIFICATION REPORT WITH GIS - REVB

CREATION OF TOURISM PARK THROUGH CONVERSION OF EQUESTRIAN STORE TO MEET AND GREET, ANCILLARY CAFÉ /RETAIL AND PLAYROOM WITH BESPOKE LODGES AND PODS TOGETHER WITH ASSOCIATED PARKING AND LANDSCAPING

LAND AT FORMER ABERGARWED SERVICE STATION, OFF B 4242 NEATH ROAD, ABERGARWED, NEATH, SA11 4EA

30th March 2026

Aerial View of Development Site Context (Source: Google Maps)

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HAYS / 1228

Application for Planning Permission
Town and Country Planning Act 1990

Head of Planning
Neath Port Talbot County Borough Council
Civic Centre
Port Talbot
SA13 1PJ

HAYSTON DEVELOPMENTS & PLANNING LTD is making an application on behalf of Mr James Caroll & family for the following planning permission:

1. **Proposal**: Creation of tourism park through conversion of equestrian store to meet and greet, ancillary café / retail and playroom with bespoke lodges and pods together with parking and landscaping
2. **Site location**: Land at former Abergarwed Service Station, off B 4242 Neath Road, Abergarwed, Neath, SA11 4EA
3. **Type of Planning Permission**: Full Permission
4. **Neath Port Talbot Local Development Plan (LDP) 2011 – 2026 (adopted January 2016)**
5. **Relevant Local Guidance:** Planning Obligations SPG (2016); Open Space and Green Space SPG (July 2017); Biodiversity and Geodiversity SPG (May 2018); Pollution (October 2016); Renewable and Low Carbon Energy (July 2017)
6. **Relevant National Legislation:**
   Town and Country Planning Act 1990
   Planning and Compulsory Purchase Act 2004
   Planning Act Wales 2015
   Well-being of Future Generations (Wales) Act 2015
   Active Travel (Wales) Act 2015
7. **Relevant National Policy and Guidance**:
   Future Wales - The National Plan 2040 (February 2021)
   Planning Policy Wales (PPW), Edition 12, February 2024
   TAN 4 (Retail and Commercial Development); TAN 5 (Nature Conservation and Planning); TAN 6 (Planning for Sustainable Rural Communities); TAN. 12 (Design); TAN 13 (Tourism): TAN 15 (Flooding); TAN. 18 (Transport); and TAN 23 (Economic Development),

1.0 INTRODUCTION

1.1 Please find enclosed the following:

- **Planning Statement and Justification Report** (this document)
- **Application forms and certificates**
- **Drawing 00a** – Expanded Location Plan – Scale A3 @ 1:2500
- **Drawing 01a** – Location and Block Plans – Scale A3 @ 1: 2500 and 1:1000
- **Drawing 02a** – Existing Topographical Survey – Scale A2 @ 1:500

- **Drawing 03e** – Proposed Site Plan – Scale A2 @ 1:500 (updated)
- **Drawing 04a** – Proposed Lodge Floor Plan – Scale A3 @ 1:50
- **Drawing 05a/06a**- Proposed Lodge Elevations – Scale A3 @ 1:50
- **Drawing 07a** – Proposed Pod Floor Plan – Scale A3 @ 1:50
- **Drawing 08a/09a** - Proposed Pod Elevations – Scale A3 @ 1:50
- **Drawing 10a** – Proposed Pod Material Swatch/Options (NTS)
- **Drawing 11a** – Proposed Toilet Block Floor Plan – Scale A3 @ 1:50
- **Drawing 12a** – Proposed Toilet Block Elevations – Scale A3 @ 1:100
- **Drawing 13a** – Vehicle Entrance Visibility Splay – Scale A3 @ 1:500
- **Drawings 14/15** – Existing Shed Floor Plan and Elevations – Scale A3 @ 1:100
- **Drawing 16** – Proposed meet and Greet Facility Floor Plan and Elevations – Scale A3 @ 1:100
- **Appendix A –** Approval Notice dated 18 October 2024 (reference 23/0689/FUL) – Waterfall Country Pods, Pencaedrain Farm, Dinas Terrace to Coed Wernhir, Rhigos, Aberdare, SA11 5NF.
- **Appendix B -** Preliminary Ecological Appraisal by I & G Ecological Consultancy Ltd dated June 2014
- **Appendix C –** Green Infrastructure Statement and Biodiversity Enhancements by I & G Ecological Consultancy Ltd dated June 2025
- **Appendix D –** Flood Consequence Assessment Statement dated 30th April 2024
- **Appendix E –** Coal Mining Risk Assessment Statement dated 24th April 2024
- **Appendix F** – Foul and surface water statement
- **Appendix G** - Policy assessment on Policy T01
- **Appendix H** – Business & Tourism Assessment with Forecasts
- **Appendix I – Flood Consequence Report (February 2026) by Francis Sant Ltd**
- **Planning Fee** – £920.00 (plus £85 planning portal) - £460 already paid under P2025/0660

1.2 The application site relates to an area of land situated on the south-eastern side of the B 4242 between the settlements of Resolven to the north-east and Tonna to the south-west, with the town of Neath further to the south-west. The site falls within the Clyne and Melincourt and Resolven Ward.

1.3 The application site comprises the former Abergarwed Filling Station which closed some years ago and some more open land to the north-east. Most of the site has lawful use for equestrian purposes although there is some more general storage use on other land to the south-west.

1.4 The proposal seeks to establish a small-scale private tourism/leisure development on the site including holiday lodges and pods together with ancillary facilities, car parking and landscaping.

1.5 The proposal seeks to complement wider natural leisure offer in the Vale of Neath, the nearby Brecon Beacons National Park and South Wales Valleys Landscape.

1.6 There is strong support from planning policy, at both the national and local level, for tourism development. The proposal would represent a highly sustainable form of development, making use of previously developed land and brownfield designation, and be ideally located to serve the locality and be of economic benefit to the area.

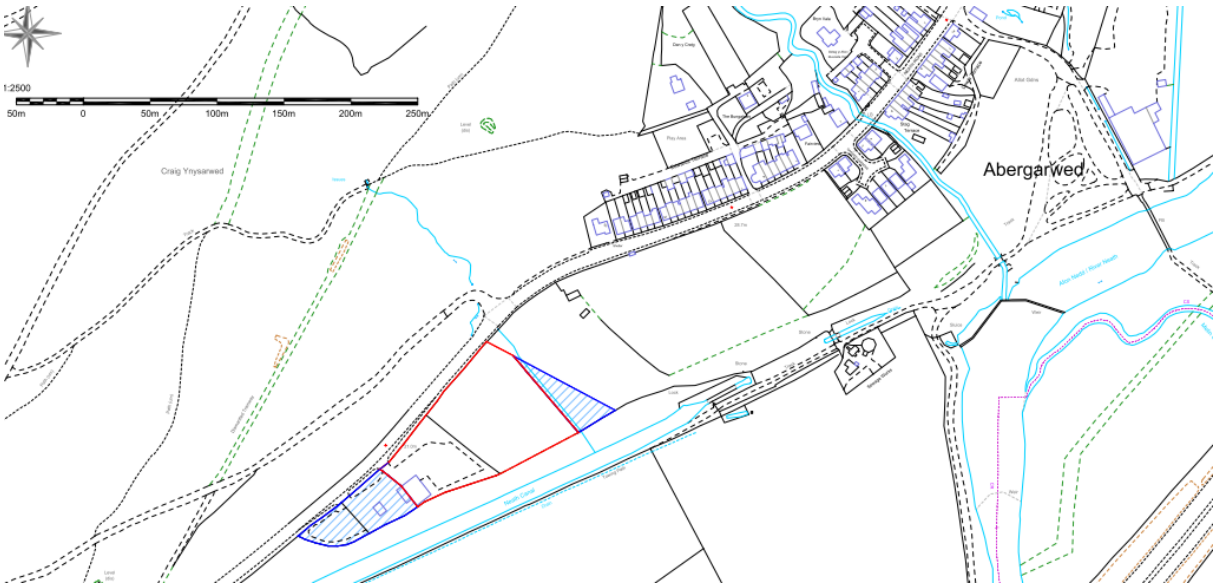
1.7 The proposal is also considered to have regard to the site constraints and environmental sensitivities of the area, including its wider countryside and landscape setting. The proposal would be relatively modest in scale and subject to careful layout, design and landscaping, can satisfactorily integrate into its valley setting.

1.8 In effect, one leisure use would be replaced by another, but with one which presents an opportunity to contribute more widely to the local Welsh economy and enhance the appearance and biodiversity interests of the site.

1.9 This report is prepared in accordance with the requirements of policies contained within the Neath Port Talbot Local Development Plan 2011-2026 (adopted January 2016) and set within the context of national planning policy and guidance, including Future Wales – the National Plan 2040 (February 2021), Planning Policy Wales (PPW) 2024 and various Technical Advice Notes.

2.0 SITE DESCRIPTION AND LOCALITY

2.1 The application site relates to an area of land situated on the south-eastern side of the B 4242 between the settlements of Resolven to the north-east and Tonna to the south-west. There is the smaller settlement of Abergarwed nearby to the north-east. The town of Neath is located some 7 kms to the south-west.



Location Plan – Drawing 00a

2.2 The application site is irregular in shape and has an area of 0.88 ha for the proposed development. There is other land adjacent which is also within the ownership of the applicant, which includes an area of land to the south-west which is used for general vehicle storage.

2.3 The application site has a lawful use for equestrian purposes, which includes the presence of a storage barn used for stabling and fodder storage together with a tack/utility building to the south-west. There is some informal hardstand to the north-east with an area of grassland/paddock further to the north-east. In addition to the buildings there are various structures, including steel storage containers and caravans, scattered around the site. Recent activities are wood and log processing.

2.4 The application site is generally flat although there is a slight slope down from north-east to south-west. There is some low close boarded fencing along much of the site frontage with ranch style fencing enclosing the paddock land further to the north-east. There are trees and other vegetation along the north-east, south-east and south-west boundaries of the site.

2.5 The site benefits from two separate vehicular accesses off the B 4242. One access serves the main equestrian use of the site with another entrance further to the south-west serving the general storage use area.

View of site looking south-west

View of site looking north-east

2.6 The B 4242 Neath Road generally runs parallel to the north-west of the main A 465, with junctions to the north-east and south-west at Resolven and Tonna respectively. Just beyond Neath the A 465 joins the M4. The B 4242 outside the site is subject to the national speed limit although this reduces to 30 mph on entry to the nearby settlement of Abergarwed. There is a narrow pavement on the same side of the with cycle lanes closer to the nearby village.

2.7 The application site is situated in a semi-rural and attractive valley setting. The topography is varied with the higher ground of the Rheola Forest opposite to the north-west and the lower ground featuring the River Neath and surrounding pastureland to the south-west, with hills and heathland in the distance.

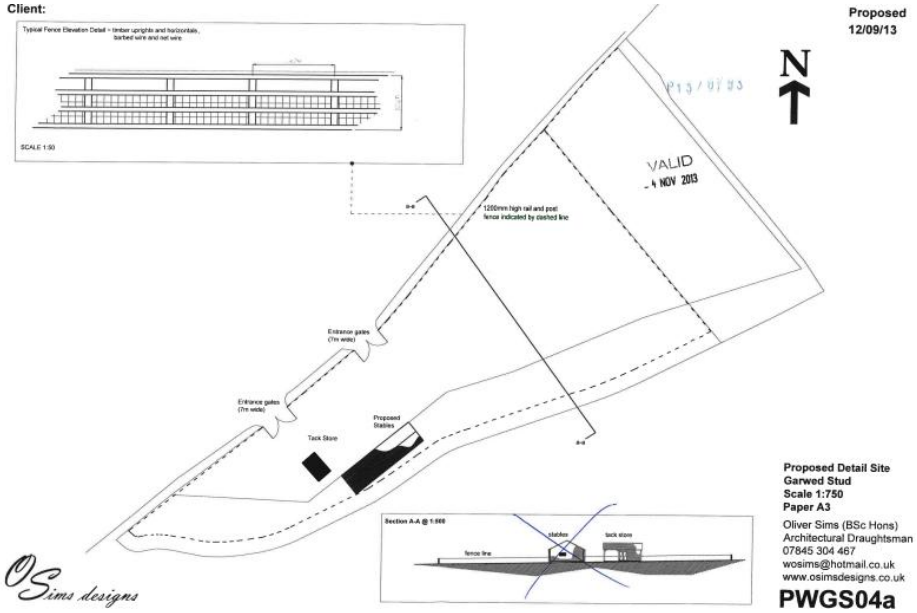
2.8 On lower ground to the south-west and just beyond the application site boundary is the Neath Canal and a towpath. In addition to some smaller settlements there are some farmsteads and isolated properties.

3.0 RELEVANT PLANNING HISTORY

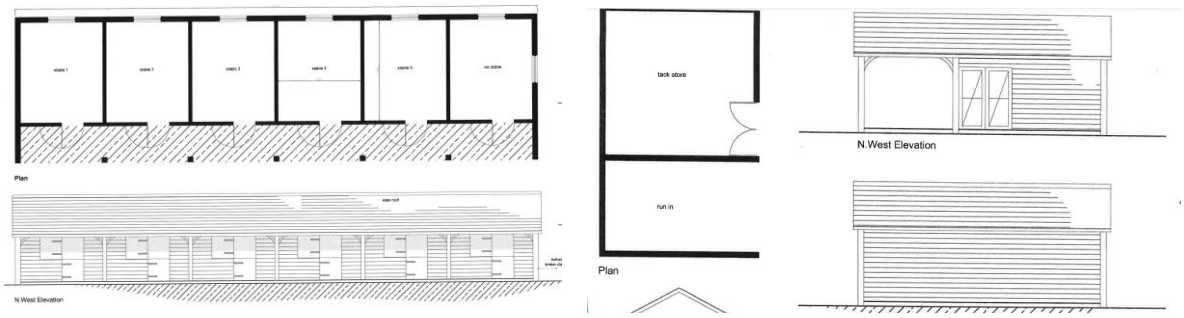
3.1 The south-western part of the site was once occupied by the former Abergarwed Filling Station which we understand would have closed upon the opening of the main A 465 Heads of the Valleys Road some years ago. The construction of the new road would have made the filling station unviable with much of the traffic diverted away from the B 4242 road.

3.2 The Council's planning website indicate that have been three planning applications affecting the site in recent years.

3.3 In December 2013, planning permission was granted (reference P/2013/0793) for the retention of a 1.2 m high perimeter fence together with proposed stables and tack room buildings. The proposed fencing was shown to enclose all sides of the site with the proposed stables and tack room buildings located towards the south-western part of the site.



Approved Site Plan



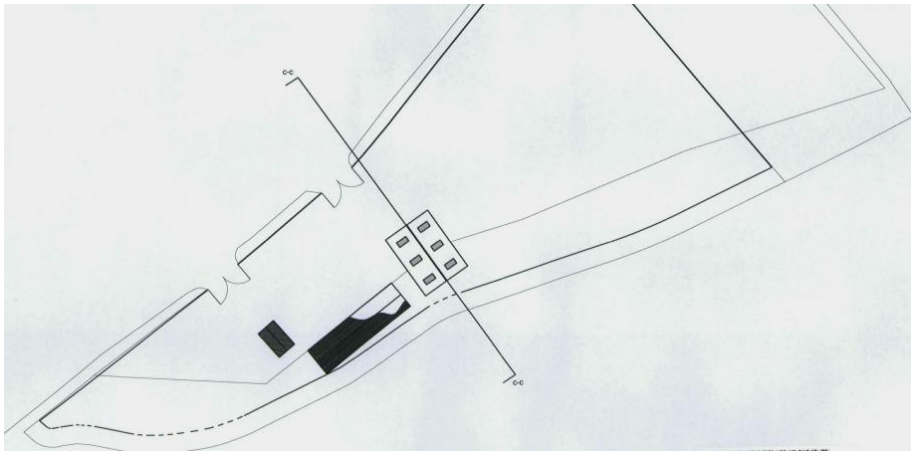
Approved Stables and Tack Room Buildings

3.4 Although there is fencing present along the site frontage the rest appears incomplete and the proposed buildings would not appear have been implemented.

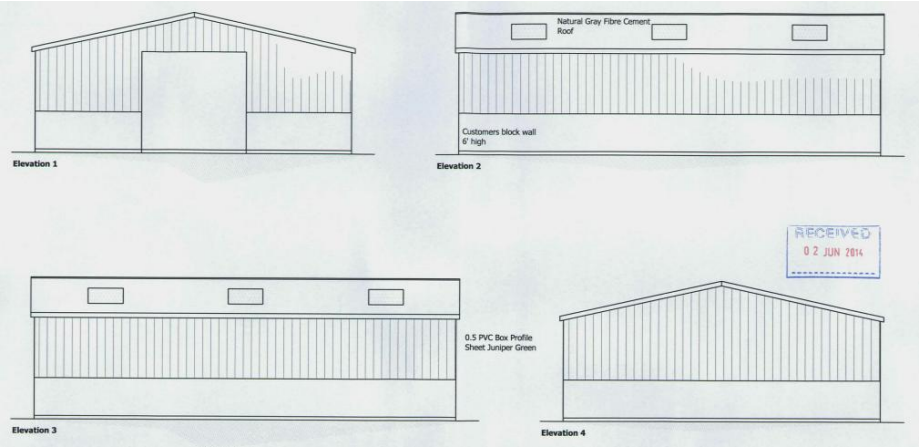
3.5 In granting the permission the Council concluded the following:

'The proposed development would not have a detrimental impact upon the amenities of any neighbouring residents or upon the character or appearance of the surrounding rural area, and there would be no adverse impact upon highway and pedestrian safety.'

3.6 The above was shortly followed in August 2014 by a further planning permission being granted (reference P/2014/0503) for the erection of a barn for the storage of equipment and fodder for equestrian use.



Approved Site Plan



Approved Elevations

3.7 The use of the approved building was conditioned accordingly and the reason for granting permission was similar to that stated in respect of the 2013 application.

3.8 In February 2020, permission was granted (reference P2019/5706) for the variation of condition 3 of the previous permission to allow the use of the approved storage building to be used for the stabling of horses and storage.

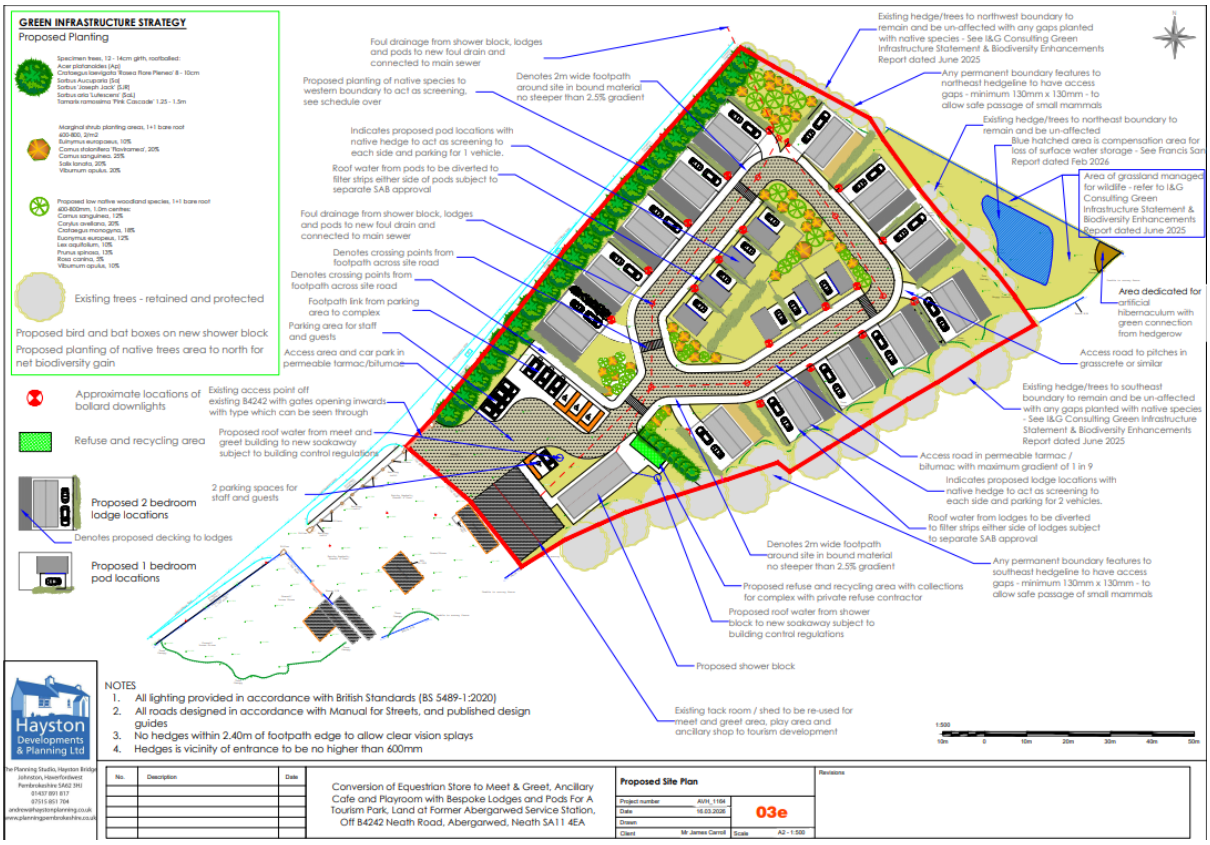
3.9 The use of the building was conditioned accordingly and the reason for granting permission was similar to the previous two applications. A condition also required some the land to be restored to grassland for equine use.

3.10 In view of the planning history, the lawful use of the site would therefore be for equestrian and associated business storage use.

4.0 PROPOSAL

4.1 The proposal seeks to establish a small-scale private tourism/leisure development on the site including holiday lodges and pods together with ancillary facilities, together with associated parking and landscaping.

4.2 The proposal comprises most of the land within the applicant's ownership. However, a small strip of land to the north-east and the far south-western part of the land within the same ownership are excluded, with the latter remaining in its current storage use with separate vehicular access.

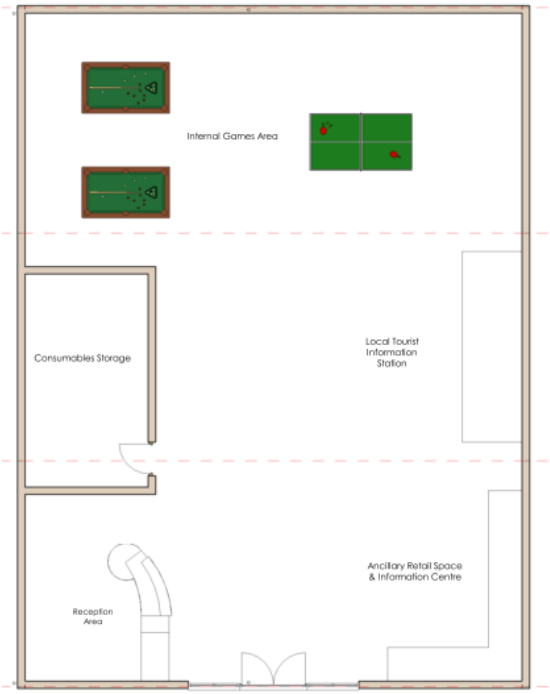


Proposed Site Layout Plan – Drawing 03e

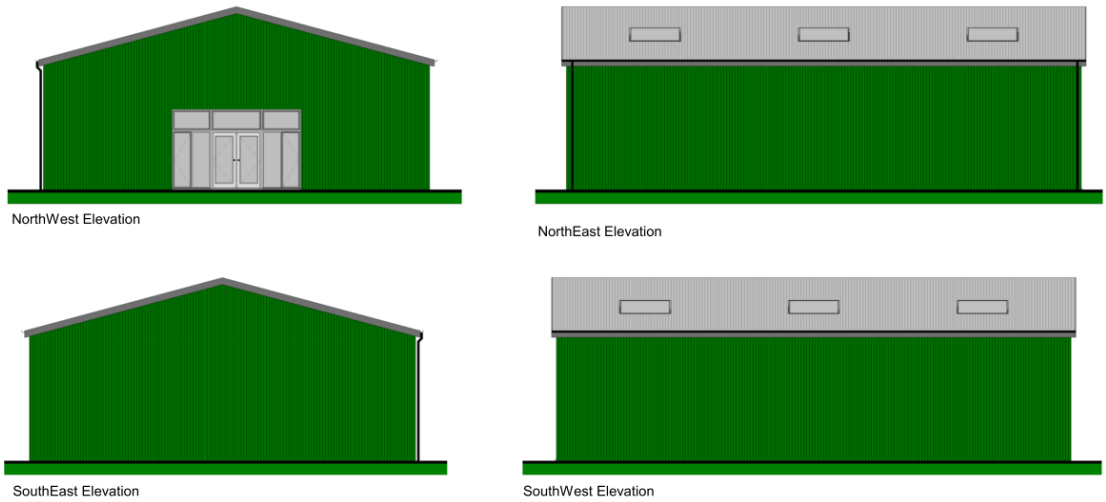
4.3 The proposal comprises several different elements which are described and set out below.

4.4 The existing equestrian/storage barn would be retained and be re-used for a meet and greet facility, play area and small shop / cafe ancillary to the main use of the site as a modest tourism/leisure development. There would be no extensions to the barn with the only external alteration being to the front entrance doors with the insertion of a smaller doorway entrance surrounded by glazing in uPVC frames. It offers some community use, however, that is likely to be small with the main use being the tourism visitors.

4.5 The proposed floor plan shows the intended use of the building, with the provision of a reception and ancillary small shop close to the entrance, a tourist information area and a play/recreation area towards the rear. There would also be a separate enclosed consumables storage room.



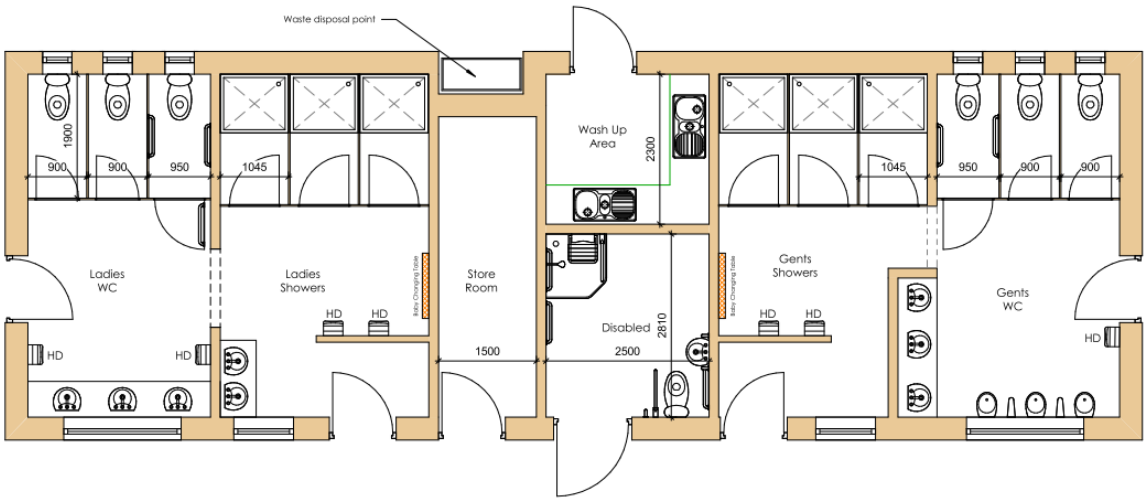
Meet and Greet Facility Floor Plan – Drawing 16



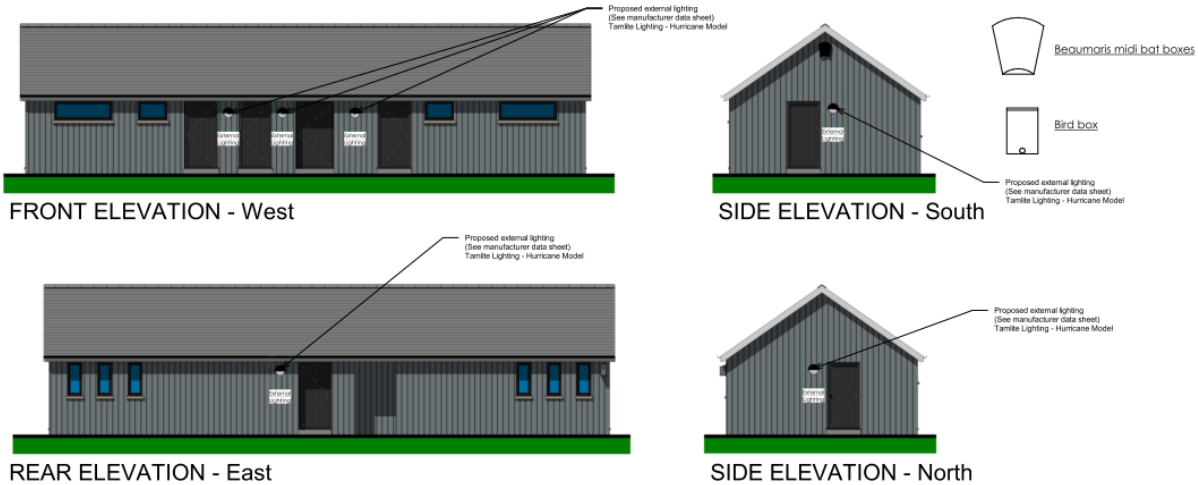
Meet and Greet Facility Elevations – Drawing 17

4.6 In proximity to the meet and greet facility, it is proposed to erect a toilet/welfare block. The internal layout shows the provision of separate toilet and shower facilities for gents and ladies with the central section given over to a disabled toilet, washing area and storeroom.

4.7 The building would be single storey in form with a gable-ended traditional pitch roof. The building would adopt a typical rural/agricultural appearance with grey cladding to the walls under grey box profile roofing sheets with black uPVC for the doors and fenestration. There would be low-level and shielded external lighting and the installation of suitably designed bird and bat boxes on the walls.



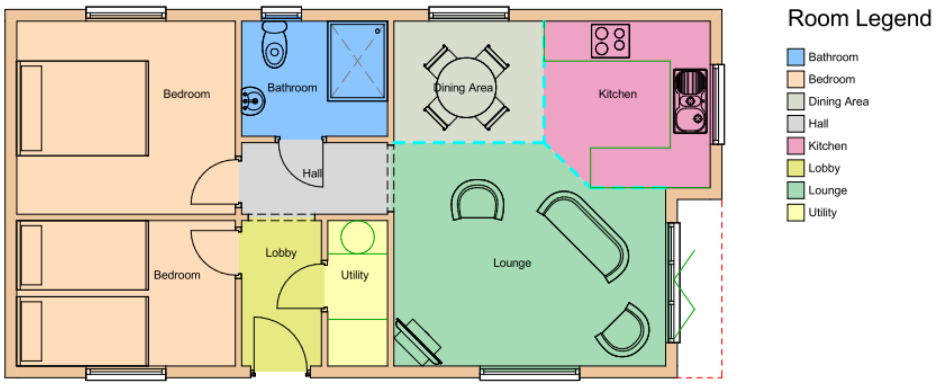
Proposed Toilet/Welfare Block Floor Plan – Drawing 11a



Proposed Toilet/Welfare Block Elevations – Drawing 12a

4.8 The main part of the site to the north-east would be laid out with a series of 13 x 2 bed timber lodges and 7 x 1 bed timber pods set around an internal access track and within landscaped grounds. The 2 bed lodges would be located around the sides with the 1 bed pods being located within the more central part of the site.

4.9 The proposed lodges would have self-contained facilities and would fall under the definition of a caravan under the 1968 Act and 2006 Order. The lodges would be in brown timber or composite cladding under a shallow pitched blue/black coated steel pantile roof.

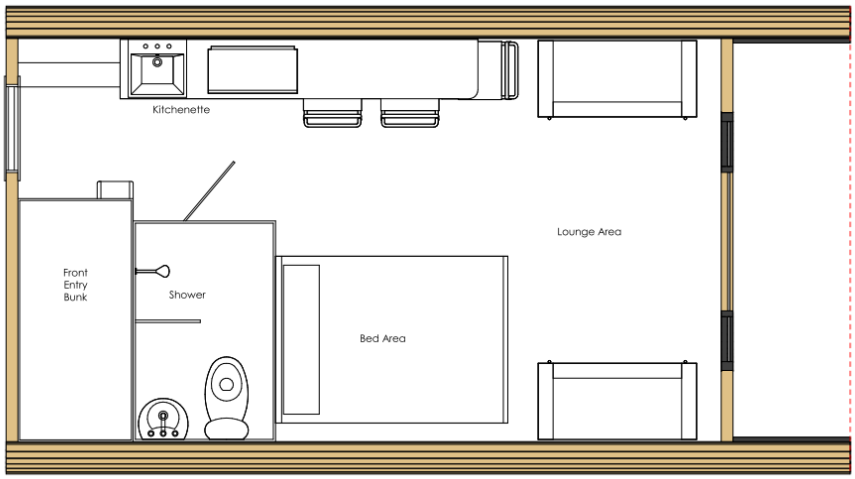


Proposed Lodge Floor Plan – Drawing 04a

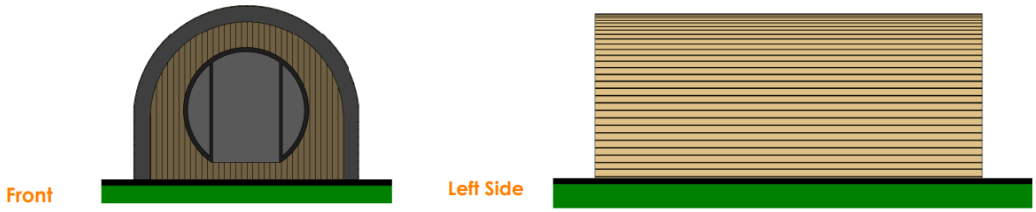
Rear Right Side

Proposed Lodge Elevations – Drawing 04a/05a/06a

4.10 The proposed pods would be smaller in size also with a degree of self-containment in an internal open-plan layout with an outside covered veranda at the front end of the structure. The pods would have a rounded shape with timber cladding or composite boards to the walls and roofs. However, the final finish and appearance to the pods can vary with the applicant providing a materials palette as part of the application at Drawing 10a.



Proposed Pod Floor Plan – Drawing 07a



Proposed Pod Elevations – Drawings 08a/09a

4.11 Use would be made of the existing vehicular access off the B 4242 which is considered adequate to serve the proposed development. As such, no modifications are required with adequate visibility splays of 2 m by 215 m in both directions, as illustrated on Drawing 13a.

4.12 Within the site, there would be an overflow for staff, deliveries and guest parking area close to the meet and greet building facility, comprising a total of 11 spaces including 3 for disabled use. There would be a refuse and recycling collection area in proximity to the proposed new toilet/welfare block. The lodges and pods would have the benefit of 2 and 1 parking spaces respectively located adjacent to the holiday units.

4.13 The proposal is accompanied by a robust and extensive landscaping scheme and green infrastructure strategy to help integrate the development into the site and its wider semi-rural surroundings. In addition to the retention of the existing trees and vegetation around the site's boundaries, the proposal includes a new planting strip along the road frontage together with additional planting strips and varied planted amenity areas within certain areas of the development, including a larger area of land to the north-east but within the same ownership of the applicant. There would also be a hedgerow screen between the reception/car parking area and the main holiday park area. These include specimen trees, marginal shrub planting and low native woodland species as set out within the schedule.

4.14 The internal access track and parking areas would be constructed in crush, rolled permeable stone with the access areas to the plots being in grasscrete or similar. Electric charging points are offered and updates requested by LPA Highways are shown on Drawing 03e.

4.15 Foul drainage from the development, including the lodges, pods and toilet block, would be to a new foul drain with connection to a nearby main sewer. Proposed roof water from the toilet/welfare block would be to soakaways subject to building regulations with that from the lodges and pods diverted to filter strips either side of the holiday units under TAN 15 a drainage assessment is attached as **Appendix F**.

4.16 Appendices F, G & H provide useful further information as detailed below:

- **Appendix F** – Foul and surface water statement
- **Appendix G** - Policy assessment on Policy T01
- **Appendix H** – Business & Tourism Assessment with Forecasts

4.17 A formal FCA has now been submitted by Francis Sant Ltd (Appendix I) dated February 2026 and Section 6 is scanned in below:

6 CONCLUSIONS AND RECOMMENDATION

Conclusions

The client wishes to develop a Tourism park at the former Abergarwed Service Station by installing 13 lodges, 8 accommodation pods, and a shower block. In addition, it is proposed to convert an existing shed into an information centre to house a meet and greet area, a play area and an ancillary shop. There are concerns, however, that the site could be at risk of flooding with a small area, on the eastern side of the site, located within a Zone 2 flood area, as shown on the Surface Water and Small Watercourse Flood Map For Planning. Francis Sant were, therefore, asked to undertake a Flood Consequence Assessment to evaluate the risk.

As shown on the Flood Map For Planning, a small area, on the eastern side of site, is potentially at risk of flooding during a Q1000 event from surface water pooling due to a dip in the topography. The flood area is connected to the adjacent watercourse and, therefore, can contain an element of flood storage. The area at risk could be removed from the development possibly incorporating it as a location reserved for planting. Alternatively the ground can be raised, with the potential loss of flood storage capacity being compensated for by lowering the ground for a similar area on the other side of the watercourse.

The site is not considered at risk from tidal or river flooding. The site is also not expected to be at risk from reservoir failure, and the risk of ground water flooding is considered to be low.

If possible, the floor level of the proposed information centre and shower block will be raised by 150mm above the surround ground levels and wet proofing measures will be employed, where appropriate, as identified in Section 5.

A Flood Response Plan is not considered necessary at present, but the site's management should remain vigilant to the potential of flooding and the risk should be reviewed periodically. A flood free access route from the site is expected during all considered fluvial events.

A sustainable drainage solution, in accordance with the Welsh Government Standards and the SUDS Manual, should be incorporated into the design. SAB approval will also need to be applied for from the local authority.

A summary of the schemes compliance with TAN 15 is provided in Table 6.1.

Table 6.1 – Compliance With Tan15

Ref	Criteria	
	What Zone does the development lie in?	Mainly zone Zone 1 and partially Zone 2
	Vulnerability of the development?	Highly vulnerable
	Is the development located on greenfield or developed land?	Part greenfield / part developed
	Is the development flood free during a 1 in 100 fluvial or 1 in 200 tidal events?	Yes
	Is the flood depth less than 600mm during a 1 in 1000 year event?	Yes
	Is the velocity expected to be less than 0.15 for a highly vulnerable development or less than 0.3 for a less vulnerable development during a 1 in 1000 year event?	Yes
	Is there a safe access route?	Yes
	Is the development at risk from costal erosion?	No
	Is the development in a defended zone?	No
	Is there a record of a previous flood event?	No
	Does the development have a detrimental impact on third parties' risk of flooding?	No not with mitigation measures

Recommendations

In developing the site, it is recommended that:

- the finished floor level of the information centre and shower block is set 150mm above the adjacent ground level;
- flood proofing measures, as identified in Section 5, should be considered for inclusion in the scheme;
- consideration should be given for the inclusion of a non return valve on the foul sewer system;
- A sustainable drainage system should be included in the design;
- SAB approval is applied for;
- The ground levels, of the surface water pooling area, is raised with an equivalent area on the eastern side of the small watercourse lowered to compensate for a loss of flood storage on a level for level basis.

The site plan is updated (Drawing 03e) to show compensation of loss of surface water storage and the overall conclusion is that the scheme complies with the latest TAN 15.

5.0 NATIONAL PROCEDURAL LEGISLATION AND PLANNING POLICY

LEGISLATION

5.1 The Well-being of Future Generations (Wales) Act 2015, sets out the requirements of LPAs to consider the long-term impacts of the decisions made, in order to work better with communities to deliver a sustainable outcome and prevent on-going issues such as climate change, poverty and health inequalities.

5.2 The Planning (Wales) Act 2015 states that LPAs must exercise their function in relation to the determination of planning applications '…as part of carrying out sustainable development in accordance with the Well-being of Future Generations (Wales) Act 2015, for the purposes of ensuring that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales.'

5.3 The Active Travel (Wales) Act 2015 sets that there is a requirement for LPAs to identify and plan for active travel routes and increase the provision for walking and cycling, and encourage users to rely less on cars, and to provide greater infrastructure to provide them.

POLICY

FUTURE WALES - The National Plan 2040 (2021)

5.4 Future Wales – The National Plan 2040 was adopted as the national development framework setting the direction of development in Wales to 2040.

5.5 The document divides Wales into four regions with the site falling into the South-West Region as covered by the Regional Strategic Development Plan. The area close to the site has been identified as a route for national connectivity with Neath-Port Talbot being identified as a national growth area. There is also the Brecon Beacons National Park nearby to the north.

5.6 The document provides a series of national policies of which four can be relevant to the proposal. Policy 1 identifies that South Wales is a key location for future growth. Policy 4 sets out that development plans should support rural communities, assess their needs and set out policies that support them. This should encourage employment opportunities and local services to those areas. Policy 5 sets out how the rural economy should be supported to promote and sustain economic growth by delivering proposals that meet the employment needs of the area. This policy also sets out the importance of supporting development that broadens the economic base of the area. in our view, this can include leisure and tourism developments. Policy 9 sets out the importance of adapting to climate change and safeguarding the natural environment, and that these are not compromised by future development.

5.7 The importance of tourism is noted on page 70 in the following statement:

"*Foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure are recognised as a major and growing employer and contributor to the Welsh rural economy…"*

Planning Policy Wales (Edition 12, 2024) (PPW)

5.8 PPW states that the primary objective of the document is to ensure that the planning system delivers sustainable development with the concept of 'place-making' being an important element. This document identifies key planning principles that include growing the economy in a sustainable manner; creating healthy and accessible environments; sustaining communities; and maximising environmental protection and limiting impact.

5.9 The document sets out four key themes which contribute to placemaking. Leisure development generally falls under the active and social places theme which includes encouraging the multiple use of open space and facilities, and where appropriate to increase their effective use; the promotion of healthier lifestyles; and enabling opportunities for outdoor activity and recreation.

5.10 The document refers to placemaking in rural areas, which highlights the following overall strategy for accommodating development:

3.38 The countryside is a dynamic and multi-purpose resource. In line with sustainable development and the national planning principles and in contributing towards placemaking outcomes, it must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors. Fostering adaptability and resilience will be a key aim for rural places in the face of the considerable challenge of maintaining the vibrancy of communities and availability of services as well as contributing to the Cohesive Communities well-being.'

5.11 The document gives strong support to tourism development which plays a very important part on the Welsh economy.

'5.5.1 Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales.

5.5.3 In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy.'

5.5.6 Planning authorities should provide a framework for maintaining and developing well-located, well designed, good quality tourism facilities. They should consider the scale and broad distribution of existing and proposed tourist attractions and enable complementary developments such as accommodation and access to be provided in ways which limit negative environmental impacts as well as consider the opportunities to enhance biodiversity.

'5.6.3 …Small-scale enterprises have a vital role to play in the rural economy and contribute to local and national competitiveness and prosperity. While some employment can be created in rural locations by the reuse of existing buildings, new development will be required in many areas.'

5.12 The proposal would provide well-located, well-designed and high-quality modest tourism facility which would make a positive contribution to the local rural economy whilst limiting its environmental impact.

5.13 **TAN 4** (Retail and Commercial Development) focuses on promoting viable urban and rural retail and commercial centres as the most sustainable locations to live, work, shop, and socialise, and to sustain the viability and attractiveness of such centres.

5.14 **TAN 6** (Planning for Sustainable Rural Communities) focuses on providing practical guidance on the role of the planning system in supporting the delivery of sustainable communities. The following are relevant:

'2.1.1 …The overall goal for the planning system to support living and working rural communities in order that they are economically, socially and environmentally sustainable.'

3.1.2 Planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment.'

3.2.1 When assessing planning applications for the re-use or adaptation of a rural building, the primary consideration should be whether the nature and extent of the new use proposed for the building is acceptable in planning terms.

3.2.3 Conversion proposals should respect the landscape and local building styles and materials. If a planning application is submitted for the re-use of a building which the

planning authority considers has a significant adverse effect on the landscape in terms of visual amenity, it may be appropriate in connection with any proposed structural changes to impose conditions to secure an improvement in the external appearance of the building.

5.15 The proposal would support the rural economy and provide an element of employment. The proposal would include the reuse of an existing rural building where the intended nature of the use and its extent are entirely appropriate and where its impact upon the landscape is established and existing.

5.16 **TAN 12** (Design) aims to equip all those involved in the design of development with advice on how sustainability, through good design, may be facilitated through the planning system. It sets out the core design principles that any development proposal should follow to create a sustainable development and exhibit a high level of design quality.

5.17 The proposal would comply with the five key objectives of good design, as follows:

- Access –The layout of the site for allow ease of access for all and promote a legible development.
- Character – The proposal is of an appropriate layout and design, having regard to its function as a holiday park; it would make use of (in part) a previously developed site and the use of an existing building; and have full regard to its sensitive semi-rural valley setting whilst minimising its visual impact.
- Community Safety – The proposal would represent a private development appropriately managed by the applicant, and would ensure attractive, safe public access and security through natural surveillance.
- Environmental Sustainability – The proposal would achieve efficient use and protection of natural resources, and significantly enhance biodiversity.
- Movement - The site has good accessibility, being located directly off the B 4242, with visitors being within easy reach of nearby tourist attractions, settlements and facilities, including by way of walking or cycling, rather than total reliance on the private car.

5.18 **TAN 13** (Tourism) identifies the importance of the Wales Tourist Board and their responsibility for promoting and developing tourism in Wales. It notes that tourism:

'4, …makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas.'

5.19 **TAN 18** (Transport) seeks to promote an efficient and sustainable transport system and minimise the need to travel. However, it also recognises the need to balance access to public transport against the contribution tourism can make in rural areas stating:

3.15 …In rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific area.'

5.20 **TAN 23** (Economic Development) advises that the planning system should support economic and employment growth alongside social and environmental considerations within the context of sustainable development.

Overall Assessment

5.21 The proposal can therefore be seen to comply with the overall objectives of national policy in relation to the location of tourism development. Whilst located within the countryside, it is within an area of South Wales which has been identified for growth and national connectivity. The site is within a reasonably sustainable location, being within easy reach of nearby towns and other settlements and their services and facilities together with convenient access of visitors to the countryside and local tourism attractions. Visitors would also be able to make use of the nearby canal towpath network. The proposal would make a positive contribution to local tourism economy.

6.0 LOCAL DEVELOPMENT PLAN ASSESSMENT

6.1 The statutory local development plan for the area comprises the Port Talbot Local Development Plan 2011 – 2026, adopted January 2016.

6.2 The Council is currently undergoing a review of the adopted Local Development Plan. We understand from the Council's planning website that work started in 2021 with the latest Delivery Agreement having been agreed with the Welsh Government in October 2023. Earlier this year, the Council completed a consultation on its Preferred Strategy for the area with adoption indicated for April 2027. Therefore, given the relatively early stage reached, no weight can be attached to this emerging Plan.

6.3 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 confirms that planning applications should be determined in accordance with the statutory Development Plan for the area, unless material considerations indicate otherwise.

6.4 In terms of planning constraints, the site is located within the countryside outside any defined urban or settlement area. The site is also within the Vale of Neath Sensitive Landscape Area (SLA3), an area for Safeguarding Minerals (Category 2 – sand and gravel) and close to the Neath Port Talbot Watercourse SINC. **Appendix F** also provides a useful foul and surface water assessment under the latest TAN 15 guidance.

6.5 The application proposal is assessed under the following main headings.

Principle of Development

6.6 **Policy SP 1** (Climate Change) is focused on implementing measures to address the causes of climate change, such as through the development of sustainable, healthy and cohesive communities, and through the enhancement and improvement of existing settlements, and encouraging sustainable travel patterns.

6.7 The above is also reflected in **Policy SP 3** (Sustainable Communities) which includes settlement limits within which development which accords with the settlement hierarchy will be acceptable in principle but also resisting inappropriate development outside settlement limits. Table 3.1 sets out the settlement hierarchy where Neath is identified as a regionally important settlement providing the widest and most diverse range of functions and located on the strategic road network. Resolven is identified as a Large Local Centre with adequate public transport links and clusters of facilities and amenities. The nearby settlements Abergarwed and Melincourt have limited facilities but adequate public transport links. The area is served by bus service 161. The site, being close to the Neath Canal, visitors would have easy access to cycle routes in the area, which includes the Neath – Glyncorrwg Loop from Port Talbot.

6.8 The important point to highlight here is that although the site is located within the countryside, it is not isolated or remote, and has good connections to these various settlements, with public transport links and access to various facilities and amenities. For example, the nearby settlement of Resolven has various facilities and amenities, including a Church, Community Hall, small Nisa supermarket, takeaways, café, recreation ground and Saturday market.

6.9 **Policy SC 1** (Settlement Limits) sets out that development within settlement limits that is proportionate in scale and form to the role and function of the settlement. However, the site lies outside of any settlement where it states that development will only be permitted in certain circumstances. Apart from part of the proposal involving the reuse/conversion of an existing building, it would not fall within any of the stated categories. *However, the supporting text explains that whether a specific development proposal is appropriate or suitable outside settlement limits will be assessed with reference to the relevant topic policies within this Plan and national policy. In our view, it is strongly argued that tourism-related developments can be appropriate in the countryside outside settlement limits.*

6.10 Where development is permitted outside settlement limits, it also states that any new buildings must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form. In this case, the proposed new buildings would be sited in proximity to the existing retained building on site.

6.11 It is contended that the proposal would be suitably located and accessible and have good connectivity to the surrounding settlements, including that of Abergardwed and Resolven nearby. A countryside location has been justified elsewhere in this Statement.

Development Strategy

6.12 **Policy SP 6** (Development in the Valleys Strategy Area) states that the local economy and communities will be enhanced and reinvigorated and the distinctive environment will be protected through area-specific measures set out within the policy. Whilst the policy centres on the two identified strategic growth areas around Pontardawe and the Upper Neath Valley around Glynneath, the supporting text explains that growth in these areas would benefit the wider area and where the area is well placed to benefit from tourism developments.

6.13 At paragraph 1.2.7, it explains that the Wales Spatial Plan and its Western Valleys Strategy identifies eleven key settlements which will have a critical role to play in the success of the city region, three of which lie within Neath Port Talbot, including Neath itself. There are several smaller settlements that have also been identified as supporting communities including the Glynneath/Resolven area in Neath Port Talbot. One of the key priorities for the Region is *'…developing a strong leisure and activity-based tourism industry.'*

6.14 Section 2.3 sets out the overall strategy for the County Borough. According to the Map 2.1, this identifies a Neath as a Primary Key Settlement with that of Resolven and Glynneath as Key Settlements, with the area being identified as an area of 'Inland Tourism Potential.'
6.15 Paragraph 2.2.19 states the following:

'Tourism within Neath Port Talbot has become a significant contributor to the local economy and has provided a variety of opportunities, especially within the valley areas. In 2011, the revenue to Neath Port Talbot from tourism was estimated to be in the region of £92 million, indicating the paramount importance of this sector to employment and business opportunity. Given that the valley communities offer the greatest concentration of tourism facilities, growth in this sector has the potential to be a major regenerative tool.'

6.16 Paragraph 2.4.14 states the following:

'The strategy and policies seek to support this industry by taking a flexible approach to new tourism proposals and resisting where possible the loss of existing facilities.'

6.17 Paragraphs 2.5.32 to 2.5.60 specifically deal with the approach to development within 'the valleys.' Whilst these paragraphs focus on the two growth areas, it also recognises that in response to the decline in the more traditional industries, there is a need to diversify into other industries, such as tourism. The following two paragraphs are relevant:
2.5.55 A wide range of visitor attractions and areas of natural beauty present opportunities for Neath Port Talbot to continue to build on its tourism industry. The Plan acknowledges this and seeks to support the industry by taking a more flexible approach to new tourism proposals and resisting where possible the loss of existing facilities. Rheola has been allocated for a new tourism development providing holiday accommodation and ancillary facilities to attract visitors to the area.

2.5.57 The Vale of Neath has become an important tourist destination, with the Waterfall Country and Neath Canal seeing increased visitors and opportunities for growth. In addition, the Swansea, Dulais and Amman Valleys present opportunities with tourist attractions in these areas and their proximity to the Brecon Beacons National Park.'

Overall Summary

6.18 It is therefore contended that the location of the site and type of development involved complies with the overall development strategy of the Plan. The Neath Valley is one of several areas which has been identified where there are opportunities for further tourism development, and where the proposal currently before the County Borough Council would contribute

supporting the changing and diversification of the rural economy. New tourism and leisure development are one of main drivers of the local economy.

Retail Development

6.19 **Policy SP 12** (Retail) states that, in accordance with general national policy, new retail development should generally be focused in directed to the main urban areas and retail centres, although it advocates a more flexible approach to small scale retail proposals in the Valleys Strategy Area. It explains this could apply to retail proposals, involving a change of use or extension, for less than 200 sqm.

6.20 In this case, the proposal involves the provision of a very small retail/information area within part of the proposed meet and greet building, through the conversion of the existing equestrian building. It would serve as an ancillary function to the proposed tourism park and given its small scale, would not conflict with the overall retail strategy for the area or materially affect the vitality or viability of other retail premises within nearby settlements. Such facilities are common on tourism sites. The goods on offer would be limited to day-day provisions and could be conditioned accordingly.

Tourism Development

6.21 **Policy SP 13** (Tourism) states that the economic prosperity of Neath Port Talbot will be promoted through encouraging continued growth in the tourist sector by:
1. Encouraging high quality, sustainable tourism development;
2. Providing a flexible approach to the development and conversions to tourism facilities;
3. Resisting, where appropriate, proposals which would result in the loss of tourism facilities;
4. Supporting tourism proposals through the allocation of land for tourism development.

The supporting text to the policy explains the following:
'Tourism in Neath Port Talbot is a growing industry, providing a vital and valid contribution to the local economy. Over recent years, Neath Port Talbot has seen considerable investment in this industry, which has strengthened tourism infrastructure and increased and improved tourism facilities and services. This, in turn, has seen annual increases in the number of visitors to the area. The Council has a tourism action plan that recognises the contribution of this industry to the local economy and promotes future growth. The LDP supports this by taking a flexible approach to new tourism proposals and resisting where possible the loss of existing facilities.

Whilst flexibility is applied, proposals will be required to demonstrate they are sustainable in terms of location, accessibility and do not have an adverse impact on the environment.'

6.22 The proposal would represent a high-quality sustainable development, part of which would involve the conversion of an existing equestrian building but also affect previously developed land. Careful attention has been given to the layout, design and appearance of the development which includes a robust and extensive landscaping plan to not only enhance the site itself but to help blend the proposed development into its surroundings.

6.23 The proposal includes the provision of a range of lodges and pods which would provide quality and varied tourism accommodation to visitors.

6.24 Whilst the site is located within the countryside, it is in a sustainable location with good accessibility off the B 4242, which allows for good linkages to the nearby town of Neath and other settlements, such as Resolven which is identified as an important Large Local Centre with a good range of facilities and amenities. Whilst there would be some reliance on the private car, there are opportunities to explore the countryside on foot or by cycle. The small shop on site would provide a basic range of goods and information which would help reduce car journeys.

6.25 It has been demonstrated elsewhere in this Statement, through careful layout, design and landscaping, that the proposal would not have an adverse impact on the environment. Whilst visible from the main road, the existing and proposed landscaping with substantially screen the development in the wider landscape and valley setting. The site already contains buildings and other structures and is used for equestrian purposes.

6.26 **Policy TO 1** (Tourism Development in the Countryside) states that tourism proposals outside of settlement limits will only be permitted where all of the following criteria are satisfied:
1. It is demonstrated that the proposal is viable and contributes towards the quality and economic sustainability of the tourism industry;
2. It is demonstrated that either the proposal requires a countryside location, or it could not be accommodated within an existing settlement;
3. The proposal would not have an adverse impact upon the landscape, ecology, and cultural heritage and would not adversely impact upon the social, economic, environmental or residential amenity of the area;
4. The proposal does not create unacceptable levels of vehicular traffic, cause a detriment to highway safety and access can be provided by a range of transport modes.

The supporting text to the policy explains the following:

'This policy offers flexibility in providing new, high quality tourism facilities outside of settlement limits in locations which would not normally be considered for development. Since a large concentration of tourism facilities are located within the valleys area, allowing development outside of settlement limits will provide scope for the tourism sector to grow and contribute to reinvigorating the valley communities.

Proposals will be required to demonstrate that they are economically viable, will promote sustainable development and enhance economic growth in the tourism sector. The valley areas, with their rural setting have the potential to continue to build on the growing tourism industry and can integrate rural diversification into tourism schemes. Evidence required to accompany applications may include business plans and local data, including information on existing and projected visitor numbers for the area and an assessment of the position of the proposed development within the current tourism market.

Certain proposals, by their very nature will require a countryside location and may include activities such as golf, fishing and mountain biking. Such activities will need to be designed in a manner to ensure the environmental impact is fully assessed and is minimised.'

6.27 The proposal would positively contribute to the rural tourism economy and help reinvigorate the valley community. The applicant owns the land and the proposal affects previously developed land. The applicant simply wishes to exchange the existing equestrian use with a tourism use, both activities relate to the outdoors and quite often require a countryside location.

6.28 The proposal would not have an adverse impact upon the landscape, ecology or cultural interests of the area. It is argued that the proposal can be satisfactorily integrated into its sensitive valley setting and any environmental impacts can be avoided, mitigated or enhanced.

6.29 The proposal would achieve positive social and economic impacts, through the provision of high-quality holiday accommodation units and in so doing, leading to healthier lifestyles with outdoor recreational and related activities. Therefore, contributing the Well-being goals of national policy and legislation.

6.30 The proposal would not create unacceptable levels of vehicular traffic, cause a detriment to highway safety and access can be provided by a range of transport modes. This is addressed further later in this Statement and a new separate document is attached as **Appendix G**.

Tourism Statement

6.31 The application involves a modest tourism development, comprising a total of 20 holiday lodges together with some ancillary facilities. The lodges would be run for holiday letting and occupation all-year round by the applicant.

6.32 The first part of Policy TO 1 requires an applicant to demonstrate that a proposal is viable and contributes towards the quality and economic sustainability of the tourism industry, with the supporting text advising that a business plan may be required. However, given the modest scale of the development proposed, this application is accompanied by some general tourism background information which provides support for development involved.

- The site is close to Neath, midway between the Brecon Beacons and the Gower and is perfectly located for tourism accommodation and near many tourist attractions as well as existing sports and outdoor pursuits, and will utilise local countryside for walks, bridleways and cycleways.

- At the national level, the latest domestic tourism statistics (*Great Britain Tourism Survey and Domestic Tourism Statistics, March 2024*) outlined that Great Britain residents took 6.79 million overnight trips in Wales between January to September 2023, equating to 19.46 million nights during these trips, with there being an increase in overnight trips rising from 6.53 million in 2022, an increase of 4%.

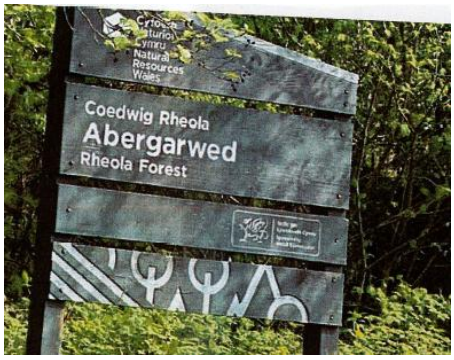
- Domestic and overseas travel intentions in 2024 are relatively positive, with intentions to take a spring (April to June) and summer (July to September) holiday or short break are higher than the equivalent period in 2023.

- In terms of more localized demand statistics, Neath Port Talbot had a total of 1.51 million tourism visits in 2019 (pre-Covid levels/latest data publicly available) which equates to 10.3% of all tourism visits to South West Wales. Of the 1.51 million tourism visitors about 0.36 million were staying visitors with 1.15 million day-visitors. From 2010 to 2019 visitor days and visitor numbers (combining day trips and overnight stays) have both increased by more than 11% (Neath Port Talbot Destination Management Plan 2023 – 2028).

- In terms of visitor profiles, the Neath Port Talbot Visitor Survey 2022 found that the main reason for visiting the area was to take part in outdoor and sporting activities (65%). The survey also found that 65% of visitors came from Wales, with 31% from England, 1% from Scotland and N Ireland and 3% from overseas.

- Overall, from the statistics, including available accommodation, there is a large demand for tourism in Neath Port Talbot which appears to be on a upwards trajectory and that the Welsh tourism industry appears to have recovered from both Covid and cost of living effects on the industry.

- The Destination Management Plan undertook a recent SWOT analysis of the tourism industry and found that there is a current lack of high-quality accommodation and limited private sector engagement. The proposal before the Council would represent a modest and high-quality tourism development that would contribute positively to the local tourism accommodation offer. Indeed, as part of its Action Plan, the document acknowledges that individually, each project has the potential to make a difference to the tourism sector in the County Borough area.



- The site is within 500 yards of the Abergarwed Rheola Forest managed by Natural Resources Wales and offers recreation and walk areas.

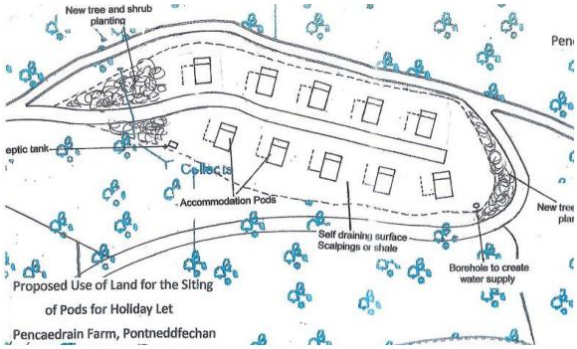
- Finally, a more comprehensive Business Plan and outlay costs has been provided in **Appendix H**.

6.33 We are aware of a planning permission, granted in October 2024 by this practice, for the establishment and expansion of an existing tourism glamping site in a location further north along the Neath Valley. This permission (reference 23/0659/FUL) relates to a development known as Waterfall Glamping Pods at Pontneddfechan, a short distance from the settlement of Glynneath. Although this site is located within the adjacent Borough of Rhondda Cynon Taf, it is close the administrative boundary of Neath Port Talbot and within the same Neath Valley

setting. It therefore has some relevance and is argued to provide some support to the principle of the current proposal at Abergarwed. A copy of the decision is attached at **Appendix A**.

6.34 This site is situated in countryside and was established as a glamping site with some 10 pods following permissions in 2018 and 2021. The later permission in October 2024 sought an expansion of the glamping site under Phase II with an additional 4 timber lodges and a meet and greet building on a different part of the site. Some details of the development are provided below:

Locational Context



Previously Approved and Recently Approved Developments

Phase I Glamping Pods

Phase II Timber Lodges

6.35 In finding the proposal to be acceptable, the reason for granting permission was stated as follows:

'The proposal would facilitate an extension to an existing holiday-let business through the provision of 4 no. lodges and a meet and greet office. The proposed tourism/leisure use has already been established through the granting of a previous planning permission (ref. 20/1380) and the proposed extension/additional lodges are of a modest scale which would ensure that the use would remain compatible with the surrounding countryside. Furthermore, taking into account the modest scale of the overall development and also the modest scale of the proposed lodges, the proposed development is considered acceptable in terms of its impact upon the character and appearance of the area…'

6.36 On the principle and location of development, Officers stated in the Planning Committee Report the following:

'The application site consists of a parcel of land that is located outside of the defined settlement boundary, in open countryside, and close to the boundary with Bannau Brycheiniog National Park. Whilst development outside defined settlement boundaries would not ordinarily comply with the sustainability objectives of Policy AW2, national policy does not hold this as a barrier to development associated with tourism, particularly as rural areas are typically associated with

this kind of use. National policy is supportive of sustainable tourism proposals in rural areas on account of the fact that it contributes to a healthy, diverse economy. It notes that diversification of rural enterprises can strengthen the rural economy and bring additional employment and prosperity to rural communities

It is considered that the proposal would be supported by Policy CS1 of the Rhondda Cynon Taf Local Development plan which encourages a strong, diverse economy and promotes new forms of employment in the leisure and tourism sectors and Chapter 5 of Planning Policy Wales (Edition 12). As such, there is no policy objection to the principle of tourism-related development in this location and the principle of the development is considered to be acceptable, subject to an assessment of other material planning considerations set out below.'

6.37 The important point to highlight here is that the above relates to a similar form and scale of development as that proposed at Abergarwed (although the latter relates to a previously developed site rather than open countryside), that this type of proposal can typically be acceptable in countryside locations and which can play an important role in supporting the rural economy, including the Neath Valley which is becoming increasingly important for tourism.

Character and Appearance of the Area

6.37 **Policy SP 14** (The Countryside and the Undeveloped Coast) states that the countryside and undeveloped coast, including landscapes, seascapes and agricultural land, will be protected and where feasible enhanced through certain measures. These include the protection of the open countryside through the control of inappropriate development outside settlement limits; and the designation and protection of Special Landscape Areas.

6.38 The supporting text explains that strategic policy aims to conserve the County Borough's countryside, landscapes and undeveloped coast, support rural enterprise including tourism and leisure activities and concentrate development in sustainable locations. *The approach is implemented through a range of detailed policies and recognises that there is a balance to be reached between accommodating development and the protection of the countryside.*

6.39 **Policy EN 2** (Special Landscape Areas) states in order to protect areas of high landscape quality, six Special Landscape Areas have been designated, which includes the Vale of Neath (E2/3). Their character has been informed by the Neath Port Talbot Landscape Character Assessment published in 2004. Development within the designated Special Landscape Areas will only be permitted where it is demonstrated that there will be no significant adverse impacts on the features and characteristics for which the Special Landscape Area has been designated.

6.40 The supporting text explains that while development is not precluded within the SLAs, these areas will be protected as far as possible from any development that would harm their distinctive features or characteristics. It explains that it is anticipated that mineral and renewable energy developments are likely to be the predominant types of proposal that could have significant impacts. Applications for developments within these areas will thus have to conform to high design standards and that in the case of any new buildings, generally these

should be located within an existing building curtilage, farm complex or other group of buildings or immediately adjacent to a settlement limit wherever possible.

6.41 The valleys are characterised by the attractive landscape setting of river valleys separated by upland plateaus and mountains. The valleys area consists of five main valleys, including the Neath Valley. The valleys are generally rural in aspect and contain scattered communities throughout. While the individual valleys have strong individual characteristics and identities, they share common features and problems.

6.42 The proposal relates to a site which is already in equestrian use with some existing buildings and associated structures. It comprises previously developed land. Whilst the proposal would extend into some more open land to the north-east, it would represent a modest and relatively low-key tourism development in the countryside. The use of external materials would be appropriate having regard to the type of development involved. Its immediate context is the B 4242 and the arterial road of the A 465 nearby and the settlements of Abergarwed and Resolven. In our view, given the location and characteristics of the site, the proposal would not harm the landscape character setting.

Layout, Design and Function

6.43 **Policy SP 21** (Built Environment and Historic heritage) states that the built environment and historic heritage will, where appropriate, be conserved and enhanced through certain measures, such as encouraging high quality design standards in all development proposals.

6.44 Policy BE 1 (Design) states that all development proposals will be expected to demonstrate high-quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. Proposals will only be permitted where all certain criteria, where relevant, are satisfied. The policy sets out some 10 design considerations. The proposal would comply for the following reasons.

- The proposal would complement and enhance the character and appearance of the site and the area within which it is located, through appropriate siting, appearance, scale, height, massing and in the use of materials.

  As set out above, the character and appearance of the area would not be harmed by the proposal.

- The proposal would respect the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges.

  It is recognized that the site may be located within the context of the arterial gateway of the A 465 which is located beyond fields to the south-east of the development. The proposed development would be generally be well screened in views by the

surrounding trees and other vegetation but may become more visible in the months of leaf fall. However, given its low profile, any visual impact and potential intrusion would be minimized. The proposal would not be prominent on any skylines or ridges. The proposal would largely be seen within the context of its location adjacent to the B 4242 Neath Road. However, even here, it is proposed to provide some additional planting along the frontage to screen the development in the medium-longer terms and to provide greater privacy to the visitors to the site.

- The proposal would utilise materials appropriate to its surroundings and incorporate hard and soft landscaping and screening where appropriate. Careful attention has been given to these aspects of the proposed development to ensure that it successfully integrates into the site and its surroundings.

- The proposal would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community. The highway safety aspect has been dealt with elsewhere in this Statement and there are no immediate neighbours that could be affected by the development.

- As set out elsewhere in this Statement, important local features such as green infrastructure, biodiversity and ecological connectivity are retained and enhanced as far as possible.

- As set out elsewhere in this Statement, the proposal would achieve and create attractive and safe places, including where appropriate natural surveillance, visibility, a suitably lit environment and areas of public movement appropriate to the type of development involved. Within the site, each of the units of accommodation would have the benefit of a private amenity space.

- Given the location of the site, there would be adequate linkages with the surrounding local community, including access to visitor attractions, and with alternative modes of transport being available to the use of the private car.

- The proposal seeks to use resources, including land and energy, as efficiently as possible, such as through the reuse of previously developed land and making the best and most efficient use of the land available, whilst not detracting from the surrounding area.

- The proposal adopts appropriate drainage systems designed to limit surface water run-of and food risk and prevent pollution.

- The layout and design of the proposal achieves inclusive design by ensuring a barrier free environment, allowing access by all and making full provision for people with disabilities, in relation to visitors to the site.

Highway safety, traffic and parking

6.45 **Policy SP 20** (Transport Network) states that the transport system and infrastructure will be developed in a safe, efficient and sustainable manner through certain measures. These include restricting development which would have an unacceptable impact on highway safety, requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport; and requiring appropriate parking provision.

6.46 **Policy TR 2** (Design and Access of New Development) development proposals will only be permitted where all of the following criteria, where relevant, are satisfied: 1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation; 2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use; 3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes; 4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.

6.47 The proposal seeks to make use of one of two existing vehicular access which serve the site. The existing vehicular access is located forward of the existing shed building which is proposed to be reused as a meet and greet facility. The gated access is slightly set back from the frontage and where the access benefits from narrow deceleration and acceleration lanes together with a pavement which runs along the full length of this side of the road.

6.48 The site once served a former filling station and now serves a site that has a lawful use for equestrian purposes. Whilst the proposal is likely to result in an increase in the amount of traffic using the site when compared to the present use, this is not likely to be so significant to adversely affect highway safety. A 40mph limit operates by the site and existing pedestrian footpath aids visibility and pedestrian safety.

6.49 The application is accompanied by a sight line visibility plan which demonstrates good and unobstructed visibility in both directions along the road, deemed appropriate for the status and traffic conditions along this stretch of the road. The additional planting along the site frontage should not affect sight line visibility.

Photos showing the 40 mph sign and pedestrian access

6.50 The proposal would be accessible by a range of travel means, including public transport and safe cycle and pedestrian routes. There is a pavement on the same side of the road and cycle lanes nearby which would provide satisfactory access to the nearby settlements of Abergarwed and Resolven to the north-east.

6.51 The arrangement of the site frontage would provide adequate space for larger service vehicles to enter, park and leave the site in forward gear.

6.52 It is considered that an appropriate amount and layout of car parking has been provided to serve the proposed development. In addition to some overflow parking close to the entrance and reception building, other parking for future holiday visitors to the site would be appropriately sited directly adjacent to the lodges and pods.

6.53 As the site is generally level, and with the proposed holiday units and facilities being at ground level only, this should allow for satisfactory accessibility within and around the site for all users. The site would be suitably signposted and surfaced together with some low-level bollard downlighters in appropriate locations to allow sage access.

6.54 It is therefore considered that, given the modest scale of development involved, the past/current use of the site and the suitability of the existing vehicular access arrangements, the proposal can be satisfactorily accommodated onto the local road network without harm to highway safety.

Nature Conservation and Ecology

6.55 **Policy SP 15** (Biodiversity and Geodiversity) states that important habitats, species and sites of geological interest will be protected, conserved, enhanced and managed through certain measures, such as the identification of Internationally and Nationally designated sites and the protection of important natural heritage features.

6.56 **Policy EN 6** (Important Biodiversity and Geodiversity Sites) states that development proposals that would affect certain important sites, such as Sites of Interest for Nature Conservation (SINCs), will only be permitted where they conserve and where possible enhance the natural heritage importance of the site; and the development could not reasonably be located elsewhere, and the benefits of the development outweigh the natural heritage importance of the site. Mitigation and/or compensation measures will need to be agreed where adverse effects are unavoidable.

6.57 **Policy EN 7** (Important Natural Features) states that development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows/field boundaries, watercourses or ponds will only be permitted where full account has been taken of the relevant features in the design of the development, with measures put

in place to ensure that they are retained and protected wherever possible, or the biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.

6.58 A preliminary ecological appraisal of the application site was carried out in June 2024 in order to determine the ecological baseline of the site, to identify any ecological constraints, necessary for informing the design of the proposed development together with recommendations. This document is attached at **Appendix B.**

6.59 In addition to providing a description of the site and surroundings, it sets out the relevant planning policy and legislation.

6.60 The appraisal identified no statutory environmental sites of concern within 2 kms of the site but that there were several non-designated sites in the vicinity. The latter comprised Sites of Importance for Nature Conservation (SINC) including the River Neath and Canal on the lower ground to the north-east and east, areas of Ancient Semi-natural Woodland and Meadows.

6.61 Having regard to the desk and on-site surveys carried out, the overall conclusion of the appraisal was that the site has a *low local ecological value* and that the dominant habitat of neutral grassland was also of low local ecological value, providing foraging opportunities, potential nest sites and refugia for a range of species.

6.62 At section 6 of the appraisal, it highlights that planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. It was therefore recommended that, in order to provide a net enhancement for the development, new native planting should be incorporated into the development using species of local provenance. It was also recommended that in order to provide a net biodiversity for biodiversity, appropriate trees in the surrounding area, including buildings in the proposed development should include artificial habitats such as bat bricks/boxes, bird bricks/boxes and/or swift/swallow cups, the details of which should be agreed with the LPA ecologist.

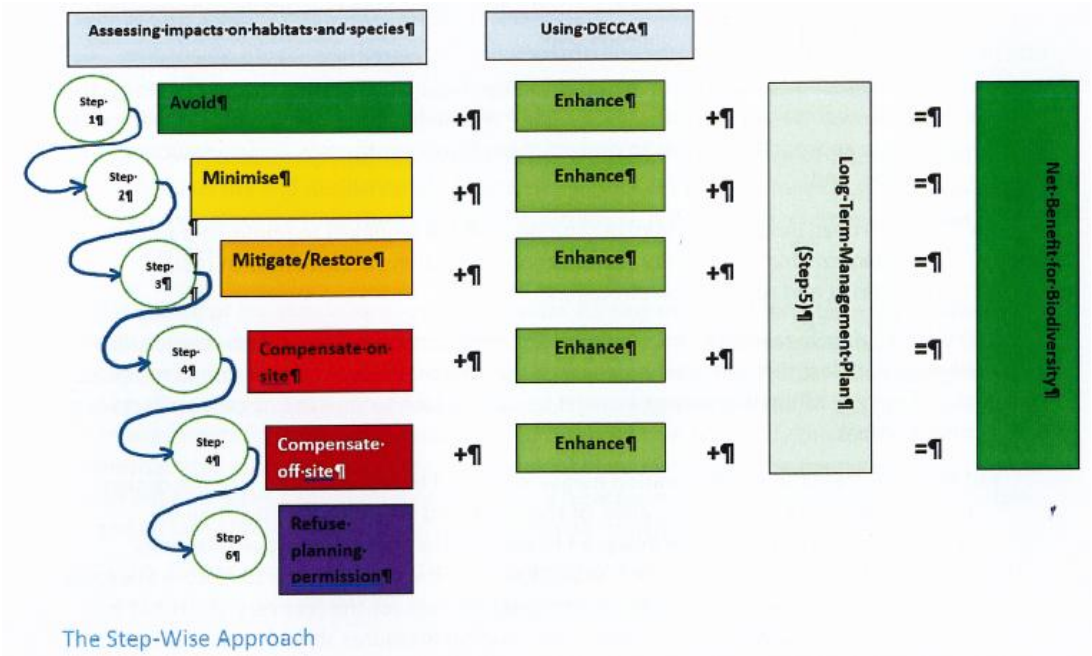
6.63 Due to the proximity of the site to several SINCs including the NPT Watercourses and Neath Canal, it was recommended that the protection of these areas during construction from pollution and sediment run-off should be built into the site working methodology, with some suggestions made. This could be secured by a suitably worded condition.

6.64 Various other recommendations are made in respect of the grassland areas, trees and woodland, bats, birds and possible reptiles through careful and appropriate management of the site, and where existing trees should be retained and protected where necessary. Appropriate external lighting should also be considered.

Green Infrastructure Statement

6.65 The application is also accompanied by a Green Infrastructure Statement together with recommendations in respect of Biodiversity Enhancements, which is **in Appendix A**. An updated GIS enhancements are also detailed in Drawing 03e.

6.66 At Section 2 of the Statement it sets out a detailed green infrastructure analysis and stepwise approach to the development of the site in accordance with Government legislation and policy. The table at 2.2 sets out the site features that will either be affected or avoided by the development; recommended protective measures to be undertaken; recommended minimisation/mitigation; and recommended compensation where relevant. Additional details are provided in section 2.4.



6.67 Section 4.1 sets out ideas for enhancing biodiversity, which include new hedge planting 'gapping up', new wildlife friendly tree planting, diverse wildlife friendly planting, built-in or externally mounted bird and bat boxes on certain buildings, and the provision of a reptile refugia. A new wet area, to the east, to compensate surface water is now provided, which will also help wildlife and aquatic plants.

6.68 These various recommended measures have been incorporated into the layout and design of the development where practical. These details can be secured by an appropriately worded condition. These are deemed to comply with national and local planning policy in protecting and enhancing the biodiversity interests of the site and the immediate locality.

Infrastructure and Services

6.69 **Policy SP 4** (Infrastructure) states that developments will be expected to make efficient use of existing infrastructure and where required make adequate provision for new infrastructure, ensuring that there are no detrimental effects on the area and community. Where

necessary, Planning Obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable.

6.70 The application sets out the proposed drainage arrangements on site. This indicates that foul drainage would be connected to a mains sewer nearby with roof water directed to soakaways.

6.71 The proposal would involve additional development on the site, in the form of a new toilet/welfare block and timber lodges and pods, which would have some impact upon the existing drainage conditions on the site. However, some parts of the site already have areas of hardstanding with the new internal access tracks and parking areas being constructed in permeable surface materials to aid natural drainage.

6.72 The proposal takes an appropriate and sustainable approach to the overall drainage of the site and given the amount of development proposed, is likely to be subject of separate SABs approval and or through the building regulations.

6.73 Given the layout and design of the development, and the various measures proposed, the proposal should be acceptable in overall drainage impact terms and not materially affect the natural environment.

Other Considerations – Flood Risk, Minerals and Potential Contamination

6.74 We have sought clarification of the flood risk status of the application site. In an email dated 30 April 2024 from a flood risk analyst (see **Appendix D**) it was confirmed that the site was located within Flood Zone 1 of the Flood Map for Rivers and Sea which is at a low risk of flooding and where all development types are acceptable in principle. As such, we do not believe that a Flood Consequence Assessment is required in this case.

6.75 The site lies close to the River Neath which is on lower ground to the east and south-east. The Flood Map obtained from Natural Resource Wales shows an area of flooding nearby (outline in blue – C2) but this is confined to the lower ground and areas either side of the River Neath and does affect the application site as indicated on the map on the next page.

Flood Map Extract – Natural Resource Wales

6.76 **Policy M 1** (Development in Mineral Safeguarding Areas) states that development proposals within mineral safeguarding areas will only be permitted where it can be demonstrated that 1. The mineral concerned is no longer of any value or potential value; or 2. The mineral can be extracted satisfactorily prior to the development taking place; or 3. In the case of temporary development, it can be implemented and the site restored within the timescale that the mineral is likely to be needed; or 4. There is an overriding need for the development; or 5. The scale and location of the development would have no significant impact on the possible working of the resource.

6.77 The site is situated in a mineral resource area, for safeguarding sand and gravel. However, the site is modest in size and partly comprises previously developed land – with an historic filling station use and now with buildings and structures associated with a lawful equestrian use. A such, the site is unlikely to be worked for such purposes or to have any significant impact on the possible working of the resource. In addition, a large part of the development is 'reversible' where the lodges and pods can be removed in the future if required.

6.78 In an email dated 25 April 2024 from a coal mining impact consultant (see **Appendix E**) it has been confirmed that there are unlikely to be any coal mining issues in this location.

6.79 **Policies SP 16** (Environmental Protection) and **EN 8** (Pollution and Land Stability) states that air, water and ground quality and the environment generally will be protected and where feasible improved through certain measures. These include ensuring that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels; giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable; and ensuring that developments do not increase the number of people exposed to significant levels of pollution. Proposals which would create new problems or exacerbate existing problems will not be acceptable unless mitigation measures are included to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level.

6.80 Part of the site was occupied by a former filling station which closed several years ago following the construction of the A 465. There is therefore the potential for pollution where new development is to be carried out and occupied by human habitation.

6.81 It is understood that the filling station occupied the far south-western area of the site, in the vicinity of the existing buildings and other structures and open vehicle storage area. This is where the two vehicular accesses are present. In this case, whilst the existing storage shed is to be reused as a meet and greet facility, the proposed holiday accommodation is proposed to be located on an area of open ground to the north-east and away from what we believe to be the previous location of the former filling station. In addition, the proposal would not involve any significant new operational development in this location.

6.82 **Policies SP 18** (Renewable and Low carbon Energy) and **RE 2** (Renewable and Low Carbon Energy in New Development) seek to reduce gas emissions and to incorporate, where appropriate, all forms of renewable energy and low carbon technology development and energy conservation and efficiency measures in proposals.

6.83 In this case, the proposal relates to a modest tourism development in respect of the provision of some lodges and pods and other ancillary development. The proposed lodges and pods would be constructed in sustainable materials with the proposed toilet block constructed to relevant building regulation standards. The proposed buildings and structures would be entirely functional in their form and construction but having full regard to the site's semi-rural location and landscape setting. It would represent a high-quality and sustainable development.

7.0 SUMMARY/CONCLUSION

7.1 The application proposal seeks to establish a small-scale private tourism/leisure development on the site including holiday lodges and pods together with ancillary facilities, car parking and landscaping .Facilities are mainly for site tourists, however, there are some opportunities for ancillary community use, if desired.

7.2 The site is argued to be ideally located for such a development. The proposal seeks to complement wider natural leisure offer in the Vale of Neath, the nearby Brecon Beacons National Park and South Wales Valleys Landscape.

7.3 The proposal is considered to represent a sustainable form of development which would generate both social and economic benefits and have full regard to the physical and environmental constraints of the site and its sensitive landscape valley setting.

7.4 The proposal includes the use of previously developed land and makes use of an existing building on the site, limiting the amount and impact of development proposed. The proposal is argued to be relatively modest in its scale with careful attention having been made to the layout, design, appearance and landscaping of the development. Net biodiversity gains and ecological enhancements are clearly provided.

7.5 The site already benefits from established and satisfactory vehicular access arrangements and service infrastructure, and where any environmental impacts can either be avoided, mitigated, compensated or enhanced as part of the overall development.

7.6 The proposal is considered to accord with the overall strategic objectives for accommodating new development, including tourism development, and for contributing to economic growth within this part of South Wales. Appendices G & H provide more relevant justification.

7.7 As such, we would welcome the support of the Council to this application.

If any further information is required, please do not hesitate to contact Hayston Developments & Planning Ltd.

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RTPI
mediation of space · making of place

Appendices