



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad	25 th September 2025
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Matt John
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BY EMAIL ONLY

Dear Sir,

Town and Country Planning Act 1990

Pre-App. Ref.: Q2025/0241
PROPOSAL: Proposed conversion of building into 13no flats with retention of 3no retail units at ground floor.
LOCATION: 62-62B Station Road Port Talbot Neath Port Talbot SA13 1LZ

I refer to your correspondence received on 5 August 2025, concerning the above and your request for pre-application advice. Having considered the nature of submission, I respond as follows.

Local Context and Constraints

The application site is located within settlement limits and within the Port Talbot Town Centre. The building is three-storey in form and is split into two structures with a two-storey secondary wing to the rear.

The building is a Building of Local Importance and also has the following constraints;

- Flood Zone 3 for rivers and for Surface Water and Small Watercourses.
- Identified GGAT site.

Amgylchedd ac Adfywio

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Environment and Regeneration

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Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Please note that this information is based on our current records and is, as far as possible, accurate. Nevertheless, we reserve the right to advise you of any additional constraints that may be identified at the time of your application.

Relevant Planning History

From an examination of our records, the application site/ property has the following relevant planning history:

- P2020/0188 - Proposal: Works to the frontage of building to restore bay windows and associated works. Decision: Approved. Decision Date: 20-NOV-20

Relevant Planning Policies

The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet its sustainable development (or wellbeing) objectives. This report has been prepared in consideration of the Council's duty and the "sustainable development principle", as set out in the 2015 Act. In reaching the recommendation set out below, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

National Planning Policy:

[Future Wales: The National Plan 2040](#) is the national development framework, setting the direction for development in Wales to 2040. The development plan sets out a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate resilience, developing strong ecosystems and improving the health and wellbeing of our communities.

The following policies are of particular relevance to the assessment of this application:

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking states that;

The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:

- **creating a rich mix of uses;**
- **providing a variety of housing types and tenures;**
- **building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;**
- **increasing population density, with development built at urban densities that can support public transport and local facilities;**

- **establishing a permeable network of streets, with a hierarchy that informs the nature of development;**
- **promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and**
- **integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.**

Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time.

Policy 6 – Town Centre First

Policy 7 – Delivering Affordable Homes

Policy 8 – Flooding

Policy 9 – Resilient Ecological Networks and Green Infrastructure

Policy 12 – Regional Connectivity

Welsh National Marine Plan

https://gov.wales/sites/default/files/publications/2019-11/welsh-national-marine-plan-document_0.pdf

This Plan extends up to the level of mean high water spring tides and the waters of every estuary, river or channel, so far as the tide flows at mean high water spring tide. In comparison, land-use planning boundaries generally extend to mean low water spring tides. This Plan therefore overlaps physically with terrestrial plans, helping to facilitate integration between land and sea planning and management.

Vision and objectives

The vision for the Welsh inshore and offshore marine plan regions is: Welsh seas are clean, healthy, safe, productive and biologically diverse:

- Through an ecosystem approach, natural resources are sustainably managed and our seas are healthy and resilient, supporting a sustainable and thriving economy;
- Through access to, understanding of and enjoyment of the marine environment and maritime cultural heritage, health and well-being are improving;
- Through Blue Growth more jobs and wealth are being created and are helping coastal communities become more resilient, prosperous and equitable with a vibrant culture; and
- Through the responsible deployment of low carbon technologies, the Welsh marine area is making a strong contribution to energy security and climate change emissions targets.
- **Band One** activities are low risk and little or no additional evidence is likely to be required to demonstrate compliance with this Plan.

- **Band Two** activities are medium risk. Some evidence is likely to be required to demonstrate compliance with this Plan. The level of evidence required will be based upon the level of risk associated with the project.

- **Band Three** activities are higher risk, including projects that require formal project assessment processes. A greater level of evidence is likely to be required to demonstrate compliance with this Plan. Proposals falling into Bands Two and Three should include a clear supporting statement on which plan policies are relevant, the extent to which the proposal complies with the policies and how the proposal contributes to the Plan vision and objectives.

[Planning Policy Wales \(Edition 12, February 2024\)](#)

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places

PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. It encourages a wider, sustainable and problem solving outlook which focuses on integrating and addressing multiple issues rather than on an approach which is fragmented, un-coordinated and deals with issues in isolation. It provides an opportunity to remove any actual or perceived problems in current approaches and stimulate and support innovative and creative ideas as well as high standards of evidence and assessment to underpin the preparation of development plans and strategies and individual proposals. Monitoring and learning from development outcomes so as to drive sustainable improvements in planning practice is also important.

The following is of particular relevance in the assessment of this planning application:

PPW 12 is supported by a series of more detailed [Technical Advice Notes](#) (TANs), of which the following are of relevance: -

- 11 - Noise
- 12 – Design
- 15 – Development, Flooding and Coastal Erosion (2025)

In addition to National guidance contained within Planning Policy Wales, any application would be considered against the Policies within Future Wales and the adopted Neath Port Talbot Local Development Plan, details of which are available on the Council's web site by visiting www.npt.gov.uk/ldp. The relevant policies would include:

Strategic Policies

- **Policy SP3** Sustainable Communities
- **Policy SP7** Housing Requirement
- **Policy SP8** Affordable Housing
- **Policy SP10** Open Space
- **Policy SP22** Welsh Language

Topic based Policies

- **Policy SC1** Settlement limits
- **Policy H1** Housing Sites
- **Policy AH1** Affordable Housing
- **Policy OS1** Open Space Provision
- **Policy EN2** Special Landscape Areas
- **Policy EN6** Important Biodiversity and Geodiversity Sites
- **Policy EN7** Important Natural Features
- **Policy TR2** Design and Access of New Development
- **Policy WL1** Development in Language Sensitive Areas

Supplementary Planning Guidance:

The following SPG is of relevance to this application: -

- 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 (July 2017)
- Development and the Welsh Language (July 2017)

All of the above SPG can be viewed on the [Council's website](#).

Analysis of Proposal

Principal of development

The application site is located within settlement limits whereby Policy SC1 identifies that development within settlement limits is acceptable in principle subject to compliance with the following policies and material considerations.

Due to the application sites location with the Port Talbot Town Centre, Policy R2 would be relevant and sets out the following;

- 1. Within the designated retail centres, uses that would enhance the vitality, viability and attractiveness of the centre, including uses in classes(16) A and D will be permitted where:
 - a) The proposal integrates with and strengthens the layout, retail character and pedestrian flows of the centre; and
 - b) Does not prejudice the effective use of upper floors; and (c) Maintains a vibrant and attractive shopping street frontage.*
- 2. Proposals for the redevelopment or conversion within a retail centre of retail, commercial, leisure or community premises to ground floor uses not complying with point 1 of this policy will only be permitted where:
 - a) It is demonstrated that the existing use is no longer viable or appropriate in the location; and
 - b) The proposal would not result in the loss of a supermarket, shop, café or public house which is important in terms of providing facilities to serve the community; Or:
 - c) The proposal would result in the redevelopment of derelict, unsightly, underused and vacant land / premises for alternative uses which would have significant social, community or regeneration benefits.*
- 3. Within the designated Primary Shopping Streets in Neath and Port Talbot town centres, ground floor uses other than Class A1 (Shops) will only be permitted where:
 - (a) The proposal falls within Class A2 (Financial and Professional Services) or Class A3 (Food and Drink); and
 - (b) The proposal does not result in the over-dominance of any non-A1 use; and
 - (c) The proposal on its own and/or in combination with other proposals and commitments does not lead to:
 - i. A material adverse effect on the retail function of the Primary Shopping Streets; or
 - ii. A material reduction in the number and distribution of shop premises within the retail frontage that it will occupy and within the Primary Shopping Streets as a whole.*
- 4. Within the district and local retail centres, proposals that would result in the over dominance of one use to the detriment of the vitality, viability and attractiveness of the retail centre will be resisted.*

From the information provided as part of the pre-application, the existing retail units at ground floor would be retained, however the proposal would result in the loss of the former Port Talbot and Aberavon Constitutional Club to the rear of the building.

The floor plans detail that an existing residential unit occupies part of the second floor providing 5 bedrooms.

The application would result in the change of use of the building with the provision of 13no flats. It is noted that as part of the pre-application the applicant has not submitted a planning statement to demonstrate the proposals compliance with the above policy R2. Should a full planning application be submitted a statement would be expected, to justify the proposed development and its compliance with Policy R2 of the Local Development Plan.

The application site is also a Building of Local Importance. Policy BE2 sets out that *‘Development proposals that would affect buildings that are of local historic, architectural or cultural importance will only be permitted where:*

- 1. They conserve and where appropriate enhance the building and its setting; or*
- 2. It is demonstrated that the development could not reasonably be accommodated without affecting or replacing the building and the reasons for the development outweigh the heritage importance of the site’.*

Within the Buildings of Local Importance Supplementary Planning Guidance, the application site is described as an *‘Imposing three-storey building, red brick frontage with projecting first floor bay windows with central gable and stone detailing. The ground floor retains its central grand entrance and shopfront features with inserted modern shopfronts.’* The justification for consideration sets out that *‘although modern shopfronts have been inserted at ground floor, the building retains its original ground floor structure and main entrance and upper floors’.*

As such it is acknowledged that the focus of the building being identified as a Building of Local Importance is the frontage. From the information provided it is assumed that the front of the building would remain unchanged, with the retention of the ground floor retail units and the retention of the first and second floor window arrangement.

Should a full planning application be submitted the applicant may wish to include a Heritage Statement to outline the proposed alterations to the building and the proposed retention and conservation of any existing and historical features.

The Authority’s Housing Strategy have been consulted and confirm that there is a demand for the development however are not aware of the scheme. It is advised that the applicant contact the Authority’s Housing Strategy Team to discuss the proposed development.

The Authority’s Environmental Health Housing team have been consulted and have raised concerns with the over-intensification of the site. It is likely that the change of use is also going to require the installation of sprinklers in the flats, and with the scale of the residential element there is a possibility that pumping and water storage equipment may also need to be installed into the outside space.

Notwithstanding the over-intensification of the site, the flat layouts on the first and second floors are generally good, however the primary means of escape from the bedroom in the ground floor flats is through the combined kitchen/living space and in flat C it is directly past the kitchen. This is a fire safety risk that is not present in the better designed units on higher floors, and whilst the risk is mitigated to an extent by a sprinkler installation, and alternative layout within these flats would be preferred.

Design and Visual impact

Policy BE1 sets out 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 of the following criteria, where relevant, are satisfied:*

- 1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;*
- 2. It respects 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;*
- 3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;*
- 4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;*
- 5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;*
- 6. It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);*
- 7. It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;*
- 8. It uses resources, including land and energy, as efficiently as possible through:*
 - a. Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;*
 - b. The layout and form of the development does not preclude the reasonable use of other adjacent land;*
 - c. Developing brownfield land in preference to greenfield land where possible;*
 - d. Minimising building exposure while maximising solar gain.*
- 9. Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;*
- 10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities'.*

The application site is a large three-storey building with a two-storey rear wing that extends up to the rear lane adjoining Forge Road. The plans submitted convey that in addition to the proposed change of use to create 13no flat, the proposal would also include the following works;

- Proposed lift shaft to the rear
- Proposed hip to gable extension to rear wing
- Proposed doors and windows
- Enlarged external staircase
- Juliet balconies to rear elevation of main building
- Potential demolition of single storey rear extension (however this is not clear from the key on the plan)

The proposed lift shaft would extend above the eaves of the existing property however would be located on the rear elevation of the property and would not be visible from Station Road. It is noted that the majority of buildings along station road have rear extensions and wings and as such the proposed lift shaft and the hip to gable extension are not considered to be out of keeping.

The plans appear to show the demolition of a single storey extension within the rear courtyard area. Should a full planning application be submitted a site visit would be undertaken to assess the proposed demolition works.

In addition, several windows are proposed to be installed and relocated to the side and rear elevations of the building and secondary wing of the site. Should a full planning application be submitted a site visit would be undertaken to assess the outlook and potential overlooking impacts of the new windows and doors. In terms of visual appearance the proposed windows and doors should seek to provide vertical rhythm across all elevations.

However, from the plans provided there appears to be some discrepancies between the windows and what is currently on site. From undertaking a desk top assessment, the application site appears to abut no.64 to the north. This would restrict the ability to facilitate windows to the northern side elevation of the site at ground and first floor. The plans detail 4no windows to the first-floor side elevation serving 2no bedrooms and a living area. Should it not be possible to provide the windows to the bedrooms of flat 3 then concerns would be raised.

In addition, no windows are proposed in the living area of flat A at ground floor which also raises concerns in terms of standard of accommodation to be provided and access to sunlight for occupants.

It appears that further consideration is required for the proposed windows arrangements on site as for example, bedroom 1 of Flat 1 looks directly into the living area of Flat 3. The windows bedroom of flat 8 look out onto the lift corridor and the windows at second floor are not shown on the elevation plan and may be rooflights due to the height of the secondary wing, this is not clear from the existing plan and the proximity to the neighbouring building.

The application would be expected to provide facilities as part of the development, including secure bin storage, secure bicycle storage and clothes drying facilities. The plans submitted show a small bin store and bike store at ground floor, which is unlikely to be sufficient. Should a full planning application be submitted a management plan should be included to detail where and how the waste will be managed, and it is likely that a larger bin store area would be required due to the number of flats to be provided and a separate bin storage area for the retained retail/commercial uses. Further information regarding bin and bicycle storage is including within the Highway and Pedestrian Safety section below.

The application also proposes to extend the external fire escape. While it is noted that the staircase would not be widely visible from the lane to the rear of the site, should a full planning application be submitted a site visit would be undertaken to ensure no unacceptable overlooking.

Overall, it is considered that due to the limited external space, limited bin storage provision, the proposal is considered to be an over-intensification of the site.

Drainage

Sustainable Drainage – Statutory Requirements w.e.f January 2019

Please note that all new developments of more than 1 house or where the construction area is of 100m² or more will require sustainable drainage - built in accordance with mandatory standards for sustainable drainage published by Welsh Ministers - to manage on-site surface water. More information is available in [Schedule 3 of the Flood & Water Management Act 2010](#).

These systems must be approved by the Council's Engineering Service acting in its SuDS Approving Body (SAB) role **before construction work begins**. In this respect it is essential that a developer of any such project gain SAB approval of its surface water drainage alongside any relevant planning permission. **You will not be allowed to start construction until both permissions have been approved.**

If you have not done so already, and your development would not fall into any of the relevant exceptions, you are therefore strongly encouraged to request further advice from the SAB. Involving the SAB Officers in pre-application discussions will allow for SuDS drainage matters (to ensure suitability of proposed SuDS design in line with national standards and adequate site layout) to be considered alongside the assessment of planning merits. **There is an additional charge of £250 for this service.** This can be as part of any agreed further pre-application submissions with the Planning Authority (recommended) or independently/ direct with the SAB. You are advised, however, that failing to engage in joint pre-application discussions has the potential to lead to delays and, most notably, the potential need to obtain further planning permission should any agreed SuDS design not be compliant with any relevant planning permission. Further details are available at www.npt.gov.uk/planning.

With regard to fresh and foul sewer connections the application is encouraged to contact Dŵr Cymru Welsh Water (DCWW) to seek further pre-application advice – see note below for details of their pre-application services.

Flood Risk

Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion was adopted on 31st March 2025 and provides Local Planning Authority's guidance to reduce flood risk and develop away from high risk area. The new TAN 15 provides technical guidance which supplements the policies set out in Planning Policy Wales and Future Wales in relation to flooding and coastal erosion.

The application site is located within Flood Zone 2 and 3 Rivers and Seas and partially within Flood Zone 3 Surface Water and Small Watercourses. The site is also located within the TAN 15 Rivers Defended Zone.

As set out in Paragraph 6.1 of TAN15, a Flood Consequence Assessment would be required for any application partially or fully in Surface Water and Small Watercourses Flood Zones 2 and 3.

The prime objective of a Flood Consequences Assessment is to develop a full appreciation of:

- The risk and consequences of flooding on the development; and

- The risk and consequences (i.e. the overall impacts) of the development on flood risk elsewhere.

The proposal seeks to provide highly vulnerable development within Flood Zones 2 and 3. ‘

10.22 - Planning applications in zone 3 require the strongest justification. No new highly vulnerable development on greenfield land should be permitted in zone 3 regardless of the conclusion of any Flood Consequences Assessments and NRW will not consider these conclusions. Welsh Ministers must be notified of any such proposal a planning authority intends to approve.

*Paragraph 10.23 - Other proposals will only be appropriate if they are essential to the Development Plan Strategy to regenerate an existing settlement or achieve key economic or environmental objectives. Any redevelopment proposal must be consistent with the acceptability considerations in section 11. In addition, **proposals which include residential development must ensure that such uses do not occur at ground floor level**. Proposals that address national security or energy security needs, mitigate the impacts of climate change, that are necessary to protect and promote public health may also, by exception, be appropriate provided that their locational need is clear and the potential consequences from flooding have been considered and found to be acceptable.*

Paragraph 10.24 - In zones 2, 3 and TAN 15 defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused. In these zones, Planning Authorities should seek all opportunities to provide enhanced flood protection for existing communities at risk.

Section 11 of TAN 15 sets out the acceptability of flood consequences. It is advised that the applicant considers the contents of TAN 15 and may wish to contact Natural Resources Wales (NRW) to seek further pre-application advice – see note below for details of their pre-application services.

Impact upon neighbouring properties

Policy BE1(4) requires that development does not have a significant adverse effect on the amenity of local residents. The Authority has Supplementary Planning Guidance (adopted July 2017) on Design which provides specific advice on how to consider residential amenity impacts in determining planning applications.

The application site is located within a predominately commercial area with ad-hoc residential uses. As such careful consideration would have to be given to the impact of the development on neighbouring properties.

The proposal would result in the addition of windows, and the impact upon neighbouring properties in terms of overlooking would be fully assessed at the full planning application during a site visit. However, the addition of windows to the rear elevation of the secondary wing and onto the lane has the potential to overlook the residential units at Glan Afan.

Careful consideration would also be given to the windows overlooking to courtyard area.

Highways and Pedestrian Safety

Policy TR2 of the LDP identifies that proposals will only be permitted where there are appropriate levels of parking and cycling facilities provided. The development has to be accessible by a range of travel means, including public transport and safe cycle and pedestrian routes.

PPW states that “*It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles*”. This is reflected in the Parking Standards SPG (October 2016), which gives guidance on the level of parking required.

The Authority’s Highway Section have been consulted as part of the pre-application submission and have provided the following comments;

While the site’s proximity to public transport and local amenities supports its sustainability, the lack of available space within the curtilage raises concerns about the feasibility of meeting statutory and policy requirements for cycle parking and waste storage.

The Highway Authority recommends:

- *A detailed site layout plan showing suitably sized proposed locations for cycle and waste facilities*
- *Consideration of innovative design solutions (e.g. vertical cycle racks, underground waste containers)*
- *Engagement with the Waste Manager and Active Travel Officer to ensure compliance and practicality*

Recycling/Refuse Collection - Larger Flats and Houses of Multiple Occupancy

The Council operate a fortnightly collection of non-recyclables and a weekly collection of recyclables. It may be possible to service larger communal wheeled bins for

both non-recyclable and recyclable waste for larger blocks of flats and houses of multiple occupancy.

As a guide, Developer's designs should accommodate:

- 140 litres per flat for residual waste*
- 90 litres per flat for plastic and cans*
- 90 litres per flat for cardboard*
- 45 litres per flat for glass*
- 25 litres per flat for food waste*

There will be a minimum of five wheeled bins of various sizes from 140 to 1100 litres.

The actual provision will be determined by the Waste Manager. Wheeled bins can be presented in bin store areas. Bin store areas should not be more than 5m from an adopted highway. The Council operate a fleet of 26T refuse collection freighters for larger flats and houses of multiple occupancy, and will not travel across unadopted highways, which may be damaged by our HGVs.

Parking Requirement

Page 11 point 3.2.9 (c) of NPTCBC SPG – Parking Standards 2016 states

'If the site has no existing parking, the conversion will not require any although it would be desirable to gain these parking spaces.'

'Local circumstances should always dictate the approach to be taken'

With respect to the above and in terms of the sustainability of the site, and its proximity to the public transport hub, public car parks, the town centre, local facilities, cycle routes, and the frequency of public transport, I would have no highway objection to this proposal, as the current use has no parking provision, with no scope within curtilage to provide any, as the site is almost completely built out to the full extents of its boundaries.

Active Travel

Cycle Parking Requirement

According to Appendix D of the SPG Neath Port Talbot County Borough Council - Parking Standards (Oct 2016), the cycle parking standards for residential developments are as follows:

- Flats/Bedsits:*
 - Long-stay cycle parking: 1 space per unit.*
 - Short-stay cycle parking: 1 space per 10 units*

For a development of 13 flats or bedsits, this equates to:

- 13 long-stay cycle parking spaces (one per unit).*
- 2 short-stay cycle parking spaces (rounded up from 1.3)*

These provisions are intended to support sustainable travel and align with the Council's Active Travel objectives.

Development proposals must seek to maximise walking and cycling accessibility by prioritising the provision of appropriate on-site infrastructure and where necessary off-site infrastructure. Walking and cycling infrastructure and services should be prioritised and put in place from the outset, before people have moved in and travel patterns have been established, as per Planning Policy Wales, Edition 11 and Future Wales – The National Plan 2040. All new walking and cycling infrastructure should be built to standards set out in Welsh Government's Active Travel Guidance and off-site infrastructure should link to (where possible) routes on Neath Port Talbot Council's Active Travel Network Map. This shows where walking and cycling routes already exist (Existing Routes) and where upgrades or brand new routes are anticipated for the next 15 years (Future Routes) in built up areas. Further information on the Active Travel Guidance and Neath Port Talbot's Active Travel Network Map can be found here www.npt.gov.uk/activetravel

Biodiversity

As identified above, Policies EN6 and EN7 of the Local Development Plan will be of relevance insofar as there is a need to ensure any impacts on biodiversity/natural features are appropriately assessed and, where applicable, mitigated.

Planning Policy Wales (PPW) 12 sets out that; The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well being outcomes.

A Green Infrastructure Statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step wise approach (Paragraph 6.4.15 of PPW 12) has been applied.

Where the adverse effect on biodiversity and ecosystem resilience clearly outweighs other material considerations, **the development should be refused.**

The main policy requirements within PPW 12 can be summarised as follows:

Green Infrastructure: *Stronger emphasis on taking a proactive approach to green infrastructure covering cross boundary considerations, identifying key outputs of green infrastructure assessments, the submission of proportionate green infrastructure statements with planning applications and signposting Building with Nature standards.*

Net Benefit for Biodiversity and the Step-wise Approach: *Further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit.*

Protection for Sites of Special Scientific Interest: *Strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a 'living landscape'. Other development is considered unacceptable as a matter of principle.*

Trees and Woodlands: *Closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place. At a minimum any tree felled must be replaced at a ratio of at least 3 trees of a similar type and size planted for every 1 lost.*

The Authority's Biodiversity Team have been consulted as part of the pre-application and have identified that the building provides roosting/ foraging opportunities for bats and that works proposed in this application may disturb bats/their roosting places/affect their foraging behaviour. Therefore, prior to determination of a full application, a full bat survey, in line with Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th ed). Bat Conservation Trust, London, shall be submitted to the Planning Authority for consideration. Where bats are found a mitigation plan shall also be submitted and NRW consulted. All surveys to be undertaken by a suitably experienced ecologist.

You are therefore strongly encouraged to liaise further with the Council's Countryside & Wildlife team on biodiversity@npt.gov.uk so that they may provide proactive advice to seek to address any identified biodiversity issues at the earliest stage of your project/design.

Section 106 Planning Obligations

The Council's approved [Planning Obligations Supplementary Planning Guidance](#) (SPG) provides the local policy basis for seeking planning obligations through Section 106 Agreements in Neath Port Talbot. The Council's approved SPG is also available to view/ download at www.npt.gov.uk/planning.

Following consideration of the proposed development and potential impacts and needs arising from the development, I would advise that the Council is likely to seek planning obligations covering the following: -

- **Affordable Housing**

The Local Development Plan Policy AH1 explains that all new housing developments on sites accommodating 3 or more dwellings will be required to contribute to affordable housing provision. The application site is located within the Port Talbot Spatial Area whereby a 25% affordable housing contribution would be expected. It is noted that the development proposes 12 new dwellings on site. As such 3no of the units would be expected to be Affordable Housing Units. The applicant may wish to contact a Local Housing Association to discuss if there would be any interest in taking on the units as further information with regard to the management of the affordable units would be sought during the application stage, should a full planning application be submitted.

- **Public Open Space**

The Local Development Plan Policy OS1 (Open Space Provision) sets out that where there is a quantitative deficiency in outdoor sport, children's play, informal space or allotments, provision

will be sought, including the requirement for maintenance, in conjunction with all new residential developments of 3 or more dwellings.

In relation to open space the following contribution would be required. The proposed development would incorporate 12 additional dwellings on site. The Authority's open space information indicates a shortfall in all open space areas;

Outdoor Sports Pitch (12 units) - £3,408
Outdoor Sports - Non-Pitch (12 units) - £12,360
Informal Spaces (12 units) - £756
Children's Play (12 units) - £10,260
Allotment (12 units) - £576
Total – £27,360

Viability

Where a developer/applicant indicates that they may be unable to provide the full affordable housing requirement or other planning obligations on viability grounds, they will need to submit a detailed financial assessment of the proposed development using the Council's Development Viability Model (DVM). For more information, please visit our [Viability Assessments for Planning Applications](#) page and/or read the Council's Viability Assessment Procedure Note: [Section 106 Obligations Viability Assessment Procedure Note and Guidance Note](#).

Before submitting an application, and as part of any further pre-application discussions (which may require further charges), the Planning Officer will discuss the Council's expectations, and offer you the opportunity for a completed viability assessment to be submitted and reviewed prior to the planning application (subject to payment of the relevant charges outlined on the Council's website at [Pay planning application fees - Neath Port Talbot Council](#)). Alternatively this can be at application stage, though we would always recommend initiating discussions at pre-application stage.

Required Supporting Documentation

We would encourage you to submit your application electronically via www.gov.wales/planningapplications.

Having regard to the nature of your proposal, it is considered at this stage that in addition to the submission of standard mandatory supporting documentation such as application forms, plans and fee, any application for the above development should also be accompanied by the following additional documentation: -

- Heritage Assessment/ Statement
- Statement of how development complies with TAN15 and Flood Consequences Assessment
- Structural Survey
- Phase 1 Habitat Survey and Bat Survey
- Details of biodiversity enhancements (incorporated within your GI Statement)
- Coal Mining Risk Assessment
- Transport Assessment
- Green Infrastructure Statement.

If any subsequent application fails to include the information above, there is a chance it may not be registered and, in any event, it is likely that an application will either be refused or will not be able to be progressed until its satisfactory submission.

It is also this Authority's practice to recommend to applicants that detailed information is submitted at application stage to ensure that, in the event of planning permission being granted, that 'pre-commencement' conditions (which require approval of details prior to work starting on site) can be minimised. You are therefore encouraged to ensure that your initial submissions incorporate as much information as possible (for example materials, boundary treatment, ecology mitigation, Construction Management Plan, Travel Plan etc.), and address all matters raised in the advice given above.

Detailed guidance on the use of the national standard application form for planning permission and other associated consent regimes; and the information which must accompany a planning application so that the local planning authority can determine the validity of the application, can be found as follows: -

“Guidance on the use of the standard application form ('1app') and validation of applications”:
<https://gov.wales/sites/default/files/publications/2019-03/section-7-annex-planning-applications-lists-of-validation-requirements.pdf>

The Town and Country Planning (Development Management Procedure)(Wales) Order 2012: [http://www.legislation.gov.uk/wsi/2012/801/contents/made \(original Order\)](http://www.legislation.gov.uk/wsi/2012/801/contents/made (original Order)).
(Note subsequent Amendment Orders: [2014](#) ; [2015](#) ; [2016](#) ; and [2017](#)).

How we will deal with your planning application

As part of its emphasis on 'Delivering Quality Development Quickly', the Planning department prides itself on the service it offers our customers. Once your application has been received, this will include an allocated case officer making contact with you or your appointed agent within the first week and arranging a visit, following which we will contact you by phone or email to advise of any discrepancies with your application. We will also work with you to address any outstanding concerns, including any amendments required to make your proposal acceptable.

Once we are happy with the validity of your application, we will formally consult neighbours and relevant consultees. Provided there are no significant matters of concern resulting from such consultations, we will then seek to determine your application as swiftly as possible after the expiry of the statutory publicity period, and aim to do so within the 8 week statutory period.

While Officers will endeavour to ensure you are aware of the progress of your application, we would encourage you to contact the case officer should you wish to discuss any matter further.

Development Team Approach – Building Control

The Development Management and Building Control teams work closely to assist developers in improving the quality of their development and ensuring compliance with all appropriate conditions and Regulations. In particular, Building Control provide a competitive and highly professional service and seek to actively engage with developer's at the earliest stage of their project. You are therefore encouraged to contact the Building Control team on 01639 686820 or

by emailing building.control@npt.gov.uk to enter into early negotiations and understand the benefits of the Council's Development Team approach.

Requests for Further Advice

Following receipt of this initial advice, should you wish to discuss your scheme prior to formal submission, please contact the case officer on the direct number or email address given above. Further charges may apply.

Yours faithfully

Jessica King

If you require this information in larger print, or in an alternative format, please contact the above named officer.

Seeking Pre-Application Advice from External Consultees

Natural Resources Wales (NRW)

Natural Resources Wales has a key role in the planning system and you may wish to hold pre-application consultation with them, utilising their pre-application service, so that environmental considerations are identified and addressed at the earliest opportunity. More information about Natural Resources Wales's pre-application service, including what advice can be sought for free, and what advice is subject to a fee can be found at:

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/?lang=en>

Dŵr Cymru Welsh Water (DCWW)

Welsh Water has a key role to play in the development and planning process as the services provided are at the forefront of public health and protection of the environment. Welsh Water encourages all developers to engage with them as early as possible in order to address any issues that may arise during the planning/construction process. Please also be advised that for any major development applications you will need to consult Welsh Water as a 'Specialist Consultee' by submission of the relevant information as set out in Schedule 1C, Article 2D of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016.

Upon receipt of a pre-application enquiry, Welsh Water will provide a written response advising whether the local network(s) can support the proposal, whether off-site water mains and/or sewers will need to be provided, and whether there are any apparatus located within the land you wish to develop and the requirements for these apparatus. This service is provided for a fee of £71+ VAT (**please refer to DCWW schedule of charges**) and can be submitted by post or by completing the online enquiry form at <http://www.dwrcymru.com/en/Developer-Services>. Further information can be obtained from the dedicated team of planning officers at Welsh Water on 0800 917 2652

Mining Remediation Authority

In line with many other statutory consultees, the Mining Remediation Authority no longer provides responses to pre-application enquiries without a charge. The Mining Remediation Authority therefore requests LPAs to direct applicants that are seeking pre-application advice regarding coal mining legacy issues because their site falls within the Development High Risk Area to them, so they may provide a quotation for providing advice.

Should only a small part of your site fall within the High Risk area, we would especially encourage you to engage with the Mining Remediation Authority, since they may advise in certain situations that a Coal Mining Risk Assessment is not required.

Further advice may be found at: <https://www.gov.uk/government/organisations/mining-remediation-authority>