

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

The Town and Country Planning (Development Management Procedure)
(Wales) Order 2015 (as amended)

HEAD OF ENGINEERING & TRANSPORT

HIGHWAYS OBSERVATIONS

PLANNING APPLICATION NO: 2/3/26/0262/00
APPLICANT: Pontrhydyfen Rugby Football Club (RFC)
LOCATION: Pontrhydyfen Rugby Football Ground, Oakwood
Avenue, Pontrhydyfen, Neath Port Talbot, SA12
9SD
PROPOSAL: CONSTRUCTION OF CLUBHOUSE AND
ASSOCIATED WORKS.

The Highway Authority, in responding to the above application, provides the following substantive response:

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐

MY HIGHWAYS OBSERVATIONS ON THIS PROPOSAL ARE AS FOLLOWS:-

The scheme features several amendments following the pre-application Q2026/0377 consultation – some of which are deemed acceptable on highway safety grounds. However, there are still a number of outstanding points that must be addressed to alleviate our remaining significant highway safety concerns.

Please see below a number of highway safety concerns and conditions relating to the proposed scheme:

Extent of Public Highway

1. Prior to commencement of any works, clarification of the boundary extent of the site is required, as drawing number *1000 Rev P3* titled *Site Location Plan* shows the red line boundary of the site encompassing a portion of NPT cycle network and highway verge. However, NPT records indicate that the verge and cycle path may be owned by NPT. This must be clarified to confirm the type of agreement that is to be in place for the proposed works involving the site access and alterations to the cycle route, under sections 38, 184, and 278 of the *Highways Act 1990*.
2. Any land required to facilitate access to the site which is not currently within the ownership or control of the Highway Authority shall be subject to the

appropriate legal agreement under Section 278 and/or Section 38 of the Highways Act 1980. Such agreements shall be completed prior to the commencement of the relevant works, and shall secure the design, construction, adoption (where applicable), and future maintenance of the highway infrastructure to the satisfaction of the Highway Authority.

Site Access

We have significant highway safety concerns surrounding the access to site, and the impact of construction traffic on the surrounding highway of the site. As such, please see the following highway safety conditions relating to the site access:

3. Prior to commencement of any works, a Construction Traffic Route Access Plan must be provided, which must include the following:
 - a) A detailed route plan for all construction vehicles, including restrictions on turning movements at the Oakwood Avenue / B4287 junction. Vehicles unable to complete the turn in a single manoeuvre shall enter Oakwood Avenue via a left turn from the B4287 and exit via a right turn only, utilising the A4107 Afan Valley Road for access to and from Pontrhydyfen.
 - b) Types and anticipated numbers of construction vehicles (including HGVs, vans, and plant), together with predicted daily movements and identification of peak periods.
 - c) Measures to manage vehicular conflicts on the surrounding highway network, including interactions with residents and emergency vehicles.
 - d) Measures to prevent on-street waiting or queuing, including controls on delivery scheduling and staggered arrival times to avoid vehicle stacking.
 - e) Details of any temporary traffic management required, including TTROs, road or lane closures, temporary signage, and the use of traffic marshals or banksmen.
 - f) Provision of wheel washing facilities and measures to prevent mud or debris being deposited on the public highway.
 - g) Measures to protect existing highway infrastructure, including kerbs, footways, and verges.
 - h) On-site parking arrangements for contractors and construction staff to prevent overspill onto the local highway network.
 - i) Measures to ensure the safety of pedestrians and cyclists, including users of NCN887.
 - j) Measures to minimise noise and dust arising from construction traffic.
 - k) Arrangements to maintain continuous access for emergency services and refuse collection vehicles.
 - l) Details of traffic management arrangements during matchdays (where construction overlaps with site use), including measures to manage increased vehicular and pedestrian activity, prevent conflict with construction traffic, and ensure safe and efficient access for players, spectators, residents, and emergency services.

Swept Path Analysis

Drawing numbers *25140-SPA01 Rev A* and *25140-SPA02 Rev A* showing the swept path analysis for coaches entering and existing the site are not sufficient. The analysis carried out indicates that larger vehicles cannot complete left turns from Oakwood

Avenue onto the B4287 or right turns from the B4287 onto Oakwood Avenue. Therefore:

4. Prior to commencement of any works, an updated swept path analysis on all junctions approaching site must be submitted to and approved in writing by the Local Planning Authority (from the Oakwood Avenue – B4287 junction onwards), using the largest vehicle expected to go site (inclusive of low loader vehicles used to transport excavator equipment). The tracking must be undertaken using AutoTrack CAD software.

Should the updated swept path analysis identify any overrun areas and/or require the removal of NPT street furniture, the following condition will become applicable:

5. No development shall commence until full details of any proposed HGV overrun areas required to facilitate the turning and manoeuvring of construction vehicles have been submitted to and approved in writing by the Highway Authority. The details shall include the location, design, construction materials, and extent of the overrun areas, together with measures to prevent damage to existing highway infrastructure, verges, footways, and adjacent land.

The submitted details shall also identify any Neath Port Talbot (NPT) street furniture (including, but not limited to, signage, lighting columns, bollards, guardrails, and street nameplates) that may require temporary removal, relocation, or protection to accommodate construction vehicle movements.

Full details of the proposed removal, storage, protection, and subsequent reinstatement of any affected street furniture shall be provided and agreed in writing with the Highway Authority. All costs associated with the removal, storage, and reinstatement of such street furniture shall be at the applicant's expense.

The approved overrun areas and any associated street furniture works shall be implemented prior to their first use and retained for the duration of the construction period. Upon completion of the works, any temporary overrun areas shall be removed and all affected highway land and street furniture reinstated to its original condition, or otherwise in accordance with details agreed in writing by the Highway Authority.

Active Travel

Drawing number 25140-SK01 Rev A (Option 2) found within the submitted *Transport Statement & Travel Plan* shows the existing combined highway and cycleway network access to be retained, but for a new 3m wide cycle path to be installed on the existing verge adjacent to the existing access, with the existing barrier to be relocated closer to the proposed car park.

The general layout of these amendments is acceptable in principle, subject to no objections being raised by an active travel consultation. However, further information is required on the following:

6. No development shall commence until evidence has been submitted to and approved in writing by the Highway Authority demonstrating that the proposed access has been designed in accordance with adoptable standards.
7. No development shall commence until evidence is provided demonstrating that a section 278/38 adoptable extension is proposed. In order to ensure the road works you are required to undertake are carried out to the satisfaction of the Local Planning Authority and subsequently adopted if you so wish you are advised prior to commencing any work on these works to contact the Head of Engineering and Transport at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG (f.a.o. Mrs Joanna Weeks – Telephone No. 01639 686395 or e-mail j.weeks@npt.gov.uk) to agree the specification, enter an adoption agreement and arrange on-site inspection of your works.

Parking

Drawing number *25140-SK03 Rev A* shows the proposed parking arrangements for the site, with 40 car parking spaces and 1 coach space provision. Further details regarding parking requirement and general layout and construction details are required:

8. It is noted in section 4.16 of the *Transport Statement & Traffic Plan* that the 'seat' provision of the clubhouse has been replaced by the licensed clubhouse requirement as the space cannot be used for both purposes at the same time. However, notwithstanding the details submitted, no development shall be brought into use until details of the parking provision for the site have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall demonstrate that the parking provision accords with the requirements of the adopted *Supplementary Planning Guidance (SPG)*, based on the use or combination of uses that generates the maximum parking demand.

For the avoidance of doubt, where shared or dual-use spaces are proposed (including the clubhouse), the parking provision shall be calculated on the basis of the highest applicable parking requirement, and not on the assumption of mutually exclusive use. The approved parking provision shall be implemented in full prior to first use of the development and retained thereafter.

9. No development shall take place until details have been submitted to and approved in writing by the Local Planning Authority showing the allocation of parking spaces for staff, public visitors, and participants.

The submitted details shall clearly identify and demarcate the parking areas for each user group and demonstrate that they are capable of operating independently of one another.

The approved parking arrangements shall be implemented in full prior to first use of the development and retained thereafter.

10. Prior to commencement of any works, further details must be added to the car park layout drawing showing disabled parking provisions, adequate manoeuvrability to allow vehicles to enter and exit in forward gear, pedestrian

vision splays, and clear markings. Parking spaces must measure at least 4.8m in length by 2.6m in width, increased to 3.6m in width for disabled spaces, with 10% of the total number of spaces designated for EV charging, per the *SPG*.

Condition Survey

11. Prior to any works commencing on site including any works of removal of existing structures, a condition survey shall be carried out on the entire construction traffic route from the site, connecting via Oakwood Avenue to its junction with the B4287 and shall be submitted to and approved by the Local Planning Authority. Within one month of the completion of the development a condition survey shall be again carried out of the same stretch of highway, the findings of the survey shall be used to identify any damage to the public highway that has been caused as a consequence of the development and a scheme for the rectification of the damage together with a timetable for the completion of the works shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full in accordance with the approved details.

NOTES TO APPLICANT

Highway Adoption Agreements

To ensure the road works you are required to undertake are carried out to the satisfaction of the local planning authority you are advised prior to commencing any work on these works to contact the Head of Engineering and Transport at The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG (Highway Development Control Section Telephone No. 01639 686850 or e-mail sab-hdc@npt.gov.uk) to agree the specification, enter an adoption agreement and arrange onsite inspection of your works.

The Final Completion (adoption) Certificate for the required S.278 Agreement of the Highways Act 1980 to facilitate the junction giving access to the development, will not be issued until confirmation is submitted to the Local Planning Authority that a S.104 Agreement of the Water Industry Act 1991 has been completed and is in its maintenance period prior to adoption by DCWW.

Works on the Existing Highway (S.38 / 278 Hybrid)

Developers' attention is drawn to the provisions of Section 278 of the Highways Act, 1980 in cases where a development would require access or other works to be carried out within the existing highway. Where highway works to benefit a development require land adjacent to an existing highway to be constructed upon together with works on the existing public maintained highway, a hybrid S38/278 shall be used. Works that are to be undertaken within the existing public maintained highway only will require a S278 agreement. No Work shall be undertaken on the existing public maintained highway until the appropriate legal agreement has been entered into.

Any works undertaken on the public highway without the appropriate legal agreement with the Highway Authority, the Highway Authority has the right to request the

developer to remove and/or reinstate that part of the highway back to its original condition to the satisfaction of the Highway Authority.

A plan detailing the differences between the existing and proposed highway shall be submitted to form part of the legal agreement, this should be made up of two colours, green for the proposed area to be adopted and brown for the existing highway.

Developers are reminded that consent under the Town and Country Planning Act, 1990/91, conveys no approval for works to be undertaken affecting any part of the public highway, including verges and footways. The Developer must:-

- (i) Obtain the approval of Neath Port Talbot County Borough Council as Highway Authority for the details of any works to be undertaken in the Public Highway.
- (ii) Indemnify the Authority against all claims arising from such works, including claims under the Land Compensation Act.
- (iii) Give not less than 1 calendar months' notice in writing of the date of commencement of the works.

As part of this process you are advised that only certain contractors are permitted to undertake the works on the public highway, a list of these contractors are available from the Highway Authority's Highway Development Control Section.

Traffic Regulation Order

For the implementation of the Traffic Regulation Order you should contact the Project Manager Specials and Traffic of Neath Port Talbot County Borough Council at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG f.a.o. Mr Martin Brumby Project Manager Highways (e-mail m.brumby@npt.gov.uk or telephone 01639 686013) who will advise you of the procedure for the implementation of the required Traffic Regulation Order. *Please note this process can take up to 4 months – subject to the consultation process outcome*.

Works within the Highway

If any works are required within the highway, the written consent of the Highway Authority is required to be sought. This includes the placement of any skips, scaffolding, hoarding or any traffic management on the highway.

Damage to the Highway

If any damage arises to the highway as a consequence of any works adjoining the highway, the damage will be required to be made good to the satisfaction of the Highway Authority. Failure to do so may result in the Highway Authority making good the damage and recovering any expenses reasonably incurred by them in so doing. You should therefore contact the Highways Maintenance Unit of Neath Port Talbot County Borough Council at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG FAO Gary Thomas (Tel No. 01639 686327) e-mail g.thomas3@npt.gov.uk to discuss any licenses or approval required. This is required to be undertaken before any works commence on the highway.

Active Travel

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

SIGNED: N. Evans DATE: 01/06/2026
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