

121 Heol-Cae-Gurwen, Gwaun- Cae-Gurwen, Ammanford, SA18 1PD

Proposed Demolition of Former Club and Development of a
Tesco Express Store

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1. Introduction

Background

- 1.1. This Planning Statement has been prepared in support of a full planning application, submitted on behalf of 'NMJ Property Holdings Limited' in relation to the following development proposal at '121 Heol-Cae-Gurwen, Gwaun-Cae-Gurwen, Ammanford, SA18 1PD':

'Proposed Demolition of Former Club and Development of a Tesco Express Store'

Information Submitted in Support of the Application

- 1.2. The following information has been prepared in support of the planning application:

Document	Author
Application Forms	GJP
Planning Statement	GJP
Retail Assessment	Reeves Retail Planning Consultancy
Green Infrastructure Statement	GJP
Plans & Drawings	Inspire Design
Design and Access Statement	Inspire Design
Drainage Strategy	CB3 Consult
Ecology	Gould Ecology
Transport Statement	Acstro

- 1.3. This Planning Statement should be read in conjunction with all of the above material, in particular with regard to the Material Consideration section of this statement.
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Purpose and Structure of this Statement

- 1.4. This Statement outlines the context within which the application is made, and provides a detailed examination of the main planning considerations raised by the proposals. The Statement also sets out reasoned justification in support of the proposed development. The Statement is structured as follows:
- **Section 2** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site;
 - **Section 3** provides details of the development proposals and design objectives;
 - **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
 - **Section 5** sets out an overview of the pre-application enquiry response;
 - **Section 6** analyses the key planning considerations arising from the proposed development (considering the planning policy context); and
 - **Section 7** sets out a summary of our conclusions.

2. Site and Surroundings

Site Location and Description

- 2.1. The proposed development site is located on Heol-Cae-Gurwen, the main thoroughfare through the established residential village of Gwaun-Cae-Gurwen. The site currently comprises a derelict former club building, with areas of overgrown vegetation to the rear. An aerial image depicting the site's location can be seen below for reference.



Aerial view of the site (approximate site outline in red)

- 2.2. The site comprises a rectangular parcel of brownfield land measuring approximately 0.06 hectares and lies within the defined settlement boundary of Gwuan Cae Gurwen. The site is currently occupied by a derelict building, together with an overgrown former access route and car parking area. Images of the site's existing condition are provided overleaf.

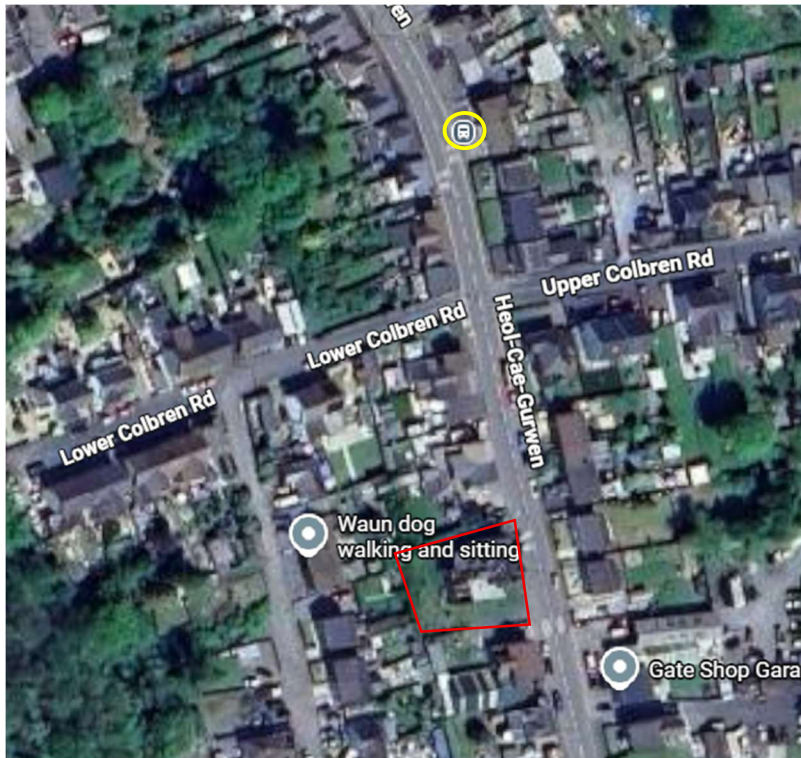


Existing Club Building on Site

- 2.3. The lawful use of the existing building is established as an events venue, having historically operated for wedding receptions, private parties, discos and other similar social functions. However, the site has since fall into a state of disrepair following its closure.

Surrounds, Sustainability and Connectivity

- 2.4. The site is located within a highly sustainable location, within the defined settlement boundary. The settlement comprises largely of residential dwellings as well as a number of services and facilities, all within easy walking distance of the site.
- 2.5. In terms of public transport provision, as shown by the extract below, the nearest bus stop is located on the road corridor that the site fronts and access out onto – to the north of the site. The stop is serviced by bus services 905 and x26 – which provide frequent services running Monday-Saturday to Neath Port Talbot and Swansea.



Approx. site location outlined in red, bus stop in yellow

- 2.6. Given the location of the site, it is within walking distance to the majority of the dwellings within the village, and benefits from good (flat and straight) footway connections in all directions. It is therefore considered that the site is located within a sustainable location and is easily accessible on foot and via public transport from Gwuen Cae Gurwen and the surrounding areas.

Access

- 2.7. The site benefits from two established vehicular access points onto Heol Cae Gurwen, which forms part of the Core Road Network as defined by the Local Development Plan. These accesses have historically served the former club and are shown in the images below.



Existing Access into Site (to be retained)



Existing Access to be removed

- 2.8. As illustrated above, both existing accesses are located immediately adjacent to the Core Road Network on Heol Cae Gurwen. However, the proposed development seeks to retain only one of these accesses, with the smaller access situated on the northern side of the site, in close proximity to the neighbouring dwelling, being removed as part of the proposal. This approach will avoid any potential highway safety, residential amenity, and vehicle conflict issues that could arise from maintaining two closely spaced accesses onto Heol Cae Gurwen.

Planning History

- 2.9. In assessing the site for development, a planning history search of the site and surrounds has been undertaken using Neath Port Talbots Planning Register. The search has identified a number of previous applications on both the site and surrounding area, these have been included in the tables below:

Planning App Ref.	Address	Proposal	Decision	Date
The Site				
L1978/0284	121 Heol Cae Gurwen, Gwauncaegurwen, Lliw Valley, SA18 1PD	leanto extension to existing cellar	Approved	08 May 1978
L1979/0670	Former RAOB Club, 121 Heol Cae Gurwen, Gwaun-Cae-Gurwen, Ammanford, SA18 1PD	Construction of living accommodation and extension of club facilities.	Approved	27 Nov 1979
P2004/1389	Land between 117 and 127 heol cae gurwen gwaun cae gurwen ammanford SA18 1PD	Demolition of club – and outline for two pairs of semi detached dwellings	Approved	02 Nov 2004

P2019/0382	Former RAOB Club, 121 Heol Cae Gurwen, Gwaun- Cae-Gurwen, Ammanford, SA18 1PD	Prior Notification for the demolition of the former club	Prior Notification Approval Not Required	29 Apr 2019
P2022/0912	121 Heol Cae Gurwen Gwaun Cae Gurwen SA18 1PD	Demolition of existing derelict 3 storey building and replacement with 3 storey apartment building (comprising 4no. 2- bed on ground and first floor and 2no 1- bed at top floor) together with a detached dwelling all with associated works and car parking.	Refused	13 July 2023
P2023/0586	121 Heol Cae Gurwen Gwaun Cae Gurwen Ammanford Neath Port Talbot SA18 1PD	Demolition of existing derelict 3 storey building and replacement with 3 storey apartment building (comprising 4no. 2- bed on ground and first floor and 2no 1- bed at top floor) together with a detached dwelling all with associated works and car parking.	Approved	02 Oct 2023

Planning History Table for the Site

Planning App Ref.	Address	Proposal	Decision	Date
Surrounding Area				
P2001/1108	Gate Shop Garage Heol Cae Gurwen Gwaun Cae Gurwen AMMANFORD SA18 1PD	Change of use from shop to office waiting room.	Approved	26 Oct 2001
P2009/0402	17 HEOL Y GORS CWMGORS AMMANFORD SA18 1PE	CHANGE OF USE OF PART OF THE GROUND-FLOOR FROM A1 (SHOP) TO A3 (HOT FOOD TAKE-AWAY) AND EXTERNAL EXTRACTION SYSTEM TO SIDE ELEVATION	Withdrawn	04 Jan 2010
P2021/1158	96 Heol Cae Gurwen Gwaun Cae Gurwen SA18 1PD	Certificate of Lawfulness (proposed) to use part of existing vehicular repair building/premises for MOT use (one of existing four vehicular repair bays to be replaced with an MOT bay)	Withdrawn	15 Feb 2022
P2023/0511	141-143 Heol Cae Gurwen Gwaun Cae Gurwen Ammanford SA18 1PD	Conversion of existing garage to holiday let accommodation with single storey side extension, the works for which include the provision of parking and turning facility.	Approved	19 Oct 2023

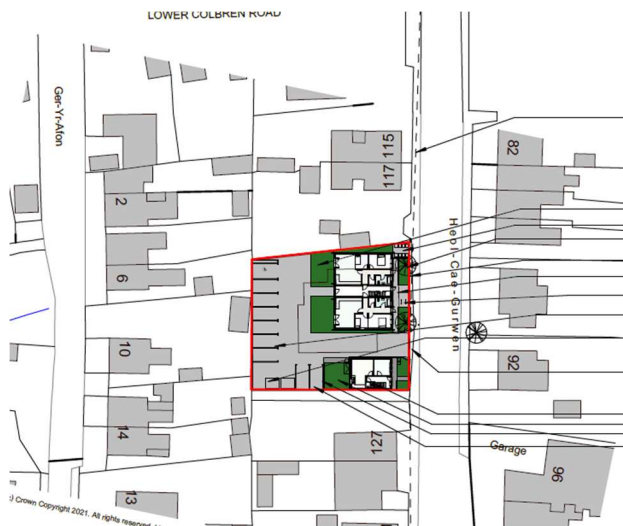
Planning History for the Surrounds

2.10. The most relevant planning application has been summarised below.

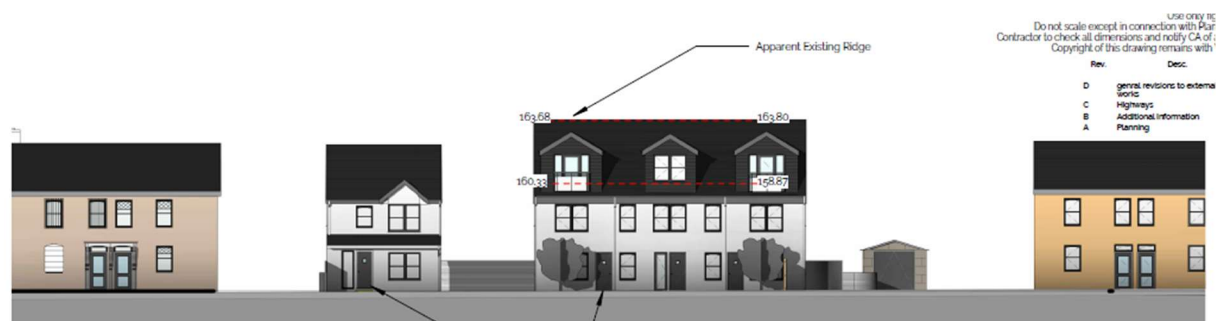
P2023/0586

2.11. The above permission relates to the *"Demolition of existing derelict 3 storey building and replacement with 3 storey apartment building (comprising 4no. 2-bed on ground and first floor and 2no 1-bed at top floor) together with a detached dwelling all with associated works and car parking"*. The application was approved on Monday 2nd October 2023, with the key details summarised below.

2.12. For ease of reference, the submitted plans of app ref P2023/0586 have been provided below.



Proposed Block Plan (app ref P2023/0586)



Proposed Street Scene (app ref P2023/0586)

2.13. In assessing the acceptability of the scheme, the following views were expressed.

Principle of Development

2.14. With regard to the principle of development, the Officer firstly noted *"The site is located within settlement limits, as defined in the LDP, and Policy SC1 states that sustainable new development that is proportionate in scale and form to the role and function of the settlement will be acceptable in principle, subject to compliance with all other requirements and policies."*

2.15. As highlighted within the planning history table, the principle of demolition of the site has previously been established and approved. The Case Officer further noted *"no proposals for alternative community facilities have come forward. Given the length of time the building has not been used as a community facility, its current dilapidated condition and lack of deliverability of previous, alternative schemes, it is considered that sufficient anecdotal evidence exists to satisfy Policy SC2 requirements. Accordingly no objection is raised to the principle of the redevelopment of this site"*.

Impact on Visual Amenity

2.16. In terms of Visual Amenity, it was firstly noted that the *"condition of the existing building/site is considered to be detrimental to the appearance of the area"*. In regard to the siting of the previously proposed scheme the Officer stated that *"The siting and orientation of the proposed buildings has been carefully considered so that they face the public realm and follow the prevailing pattern of neighbouring buildings, both in terms of height and orientation"*.

- 2.17. It was considered that the two-storey element of the proposal would have sat comfortably alongside the developments to the south, while the larger three-storey apartment building would be positioned in a similar location to the existing three-storey public house, albeit set further away from neighbouring dwellings. As such, it was concluded that the development would have a *“satisfactory impact on the visual amenity and character of the area”*.

Impact on Residential Amenity

- 2.18. Regarding residential amenity, it was firstly stated that *“The layout is considered to demonstrate that the proposal will have no detrimental impact on existing residential properties”*.
- 2.19. It was noted that the development would give rise to *“some”* overlooking of the neighbouring properties, however *“the proposed building is sited further eastwards than the existing building, thereby increasing the separation distance between the buildings. Proposed window to window distances are well in excess of the minimum 21m set out in the Council’s Adopted Design SPG and better than exists at present. On balance, therefore, the impact is considered to be acceptable having regard to the existing site context.”*
- 2.20. It was therefore concluded that, subject to strengthened boundary treatment, the proposal would not result in any adverse impact on the residential amenity of the surrounding area.

Parking and Access Requirements and Impact on Highway Safety

- 2.21. As for parking, access, and highway safety, the Officer noted that the proposed development had *“a shortfall of 4 spaces in total”*. However, the shortfall was deemed acceptable as the Officer stated *“the site is well served by public transport with a number of bus stops within close walking distance. On-street parking is prevalent in this predominantly residential area, but the site is located directly on the main A474 road that runs through the village which has on-street parking controls in place. Furthermore, additional space exists within the shared rear parking area and it is possible that additional parking could be accommodated within this area, either informally or in tandem to the proposed spaces, which, if occurs, would be a matter for the future occupiers themselves.”*
- 2.22. In turn, it was concluded that *“On balance therefore, and giving consideration to the site’s lawful use as a public house, it is not considered that a refusal on car parking grounds is warranted or necessary in this case.”*

Drainage

- 2.23. The Officer noted in relation to drainage that, *“there is a requirement to comply with national statutory SuDS standards. The layout is considered to demonstrate there is sufficient space within the site to accommodate a scheme for surface water drainage that can be compliant with standards, subject to separate SAB approval being given for the details. The Drainage Officer and Welsh Water have raised no objection in principle to the application on drainage grounds.”*

Contaminated Land

- 2.24. As set out in the Officers Report, the site was previously located in proximity of a former factory. As such, a desk study of the site is required to assess the potential pollution associated with development of the site. This could have been secured by condition.

Biodiversity/ Ecology

- 2.25. In respect of biodiversity and ecology, the submitted survey work comprised a walkover survey and a bat scoping survey undertaken on 7 July 2022. The key findings confirmed that no bat roosting activity was recorded within the building. Low numbers of pipistrelle species bats were however observed in the vicinity

of the site, including occasional flights within the building, which contains multiple openings and is missing a significant proportion of the roof to the rear.

- 2.26. The report also states the plot margins had potential suitability for nesting birds, however the plot generally had low or negligible suitability for protected species, but several small specimens of wall cotoneaster were noted which would require careful handling.
- 2.27. It was concluded that *"Provided all of the recommendations contained within Section 7 of the ecology report are implemented, the proposed works can be carried out with a negligible risk of adverse ecological impacts. Proposals for delivering a net benefit to biodiversity have been provided. The council's Ecologist raises no objection to the application subject to compliance with the ecology report recommendations."*

Interim Summary

- 2.28. It is clear from the site's planning history that the existing site and building have a lawful club-related use, and that the redevelopment of the site and building would bring about considerable betterment and enhancement in terms of use, visual amenity, and other respects.

Background

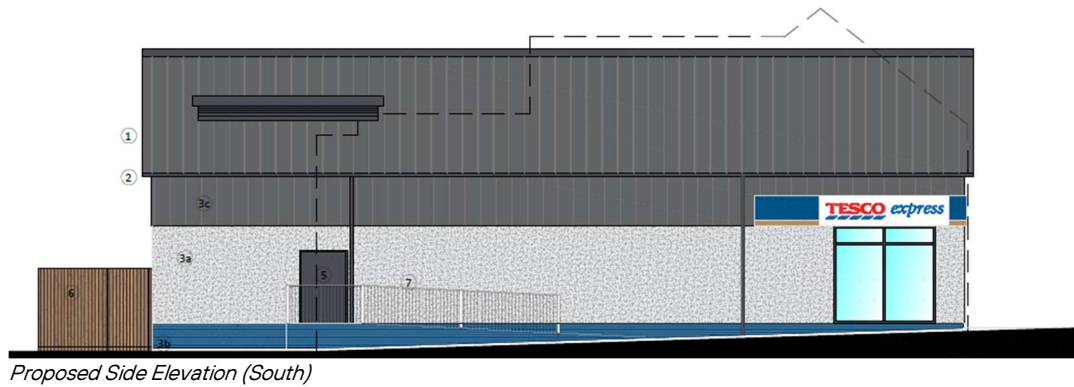
- 'Proposed Demolition of Former Club and Development of a Tesco Express Store'*

The site plan for Heol Cae Gurmen shows a rectangular building footprint with a dashed outline indicating the 'OUTLINE OF EXISTING FOOTPRINT'. The building is labeled 'FIRST FLOOR OVER' and 'PPF - 126.64'. To the left of the building is a 'DELIVERED' area with numbered parking spaces (1-10). To the right of the building is a 'NEW LOADING BAY' and a 'NEW CROSSOVER' area. The plan also shows 'NEW EXISTING SITE', 'PLANT AREA', 'SOFT LANDSCAPING', and 'NEW EXISTING ROAD'. The surrounding area includes 'NEW EXISTING ROAD' and 'NEW EXISTING ROAD'.

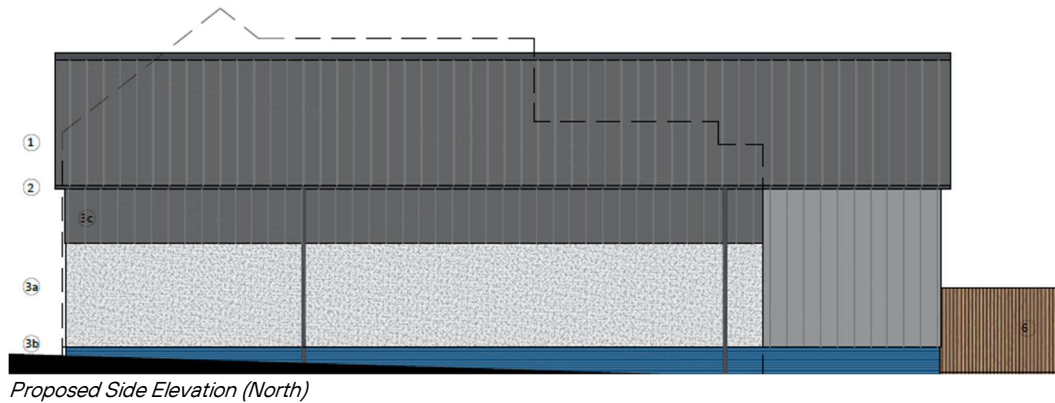
(N.B. - Dashed line shows outline/footprint of the existing building)



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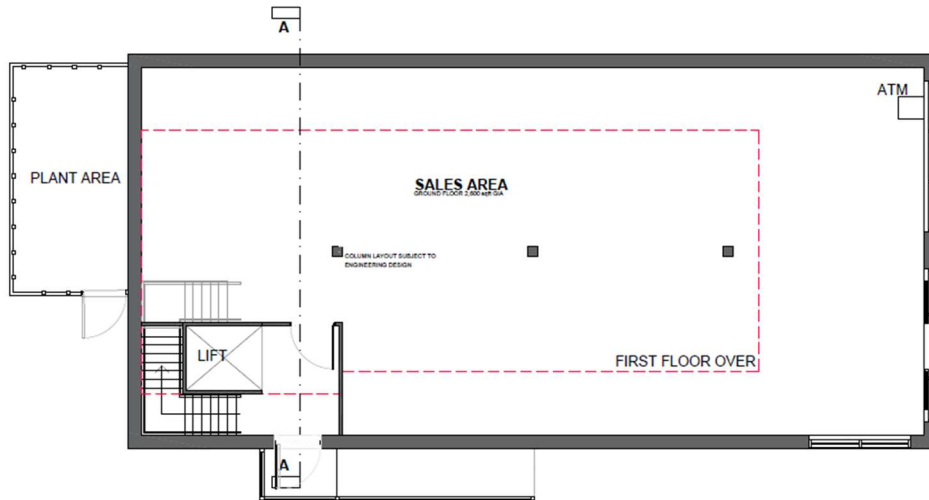


(N.B. - Dashed line shows outline/footprint of the existing building)



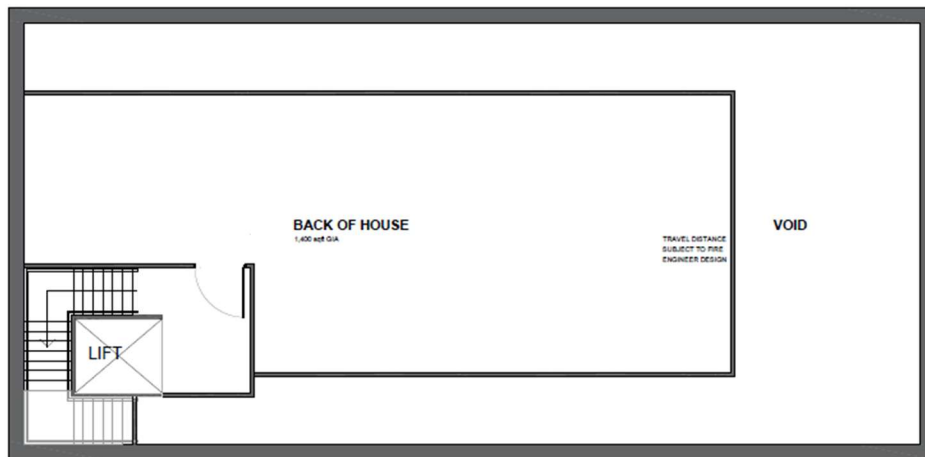
(N.B. - Dashed line shows outline/footprint of the existing building)

Floor Plans



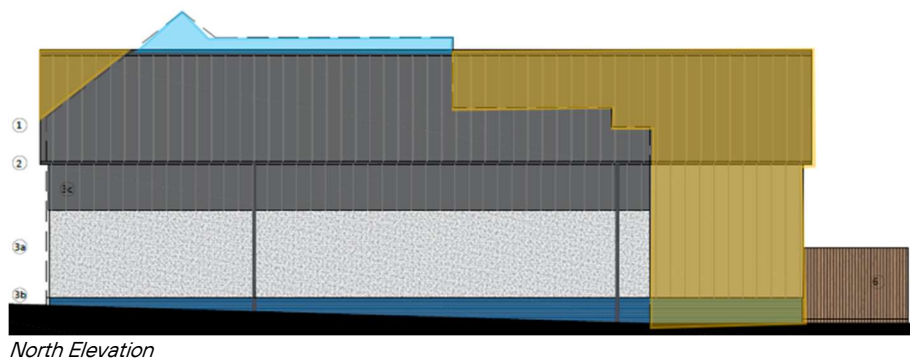
Proposed Ground Floor Plan

(N.B. – Red line shows outline of the mezzanine floor)



Proposed First Floor Plan

- 3.5. As shown in the plans above, the proposed development comprises a two-storey building, which would significantly reduce the built form and mass at site. The proposal also represents a reduction in height compared to the existing structure. To clearly illustrate the reduction in scale and massing, the illustration's overleaf have been produced.



Key	
	Loss of Massing
	Redistribution of Massing

- 3.6. As can be seen and noted from the above, the proposed building will be lower than the existing (when comparing heights), and only marginally larger in footprint – solely attributable to the 'length' of the development – the width being narrowed. Soft landscaping will enclose the plot on all sides, and no windows / outward looking features are proposed on the western and northern elevations – to ensure that no overlooking or residential amenity impacts into the closet / adjacent properties arises.



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- 3.7. The street scene above demonstrates that the proposal integrates well with the neighbouring properties, being of a similar (slightly lesser) height and massing. It also retains the established street frontage along the core road network facing the public realm and following the prevailing pattern of neighbouring buildings (e.g. siting and orientation), while providing a much-needed visual improvement compared to the existing dilapidated building – which is considered to be *“detrimental to the appearance of the area”*.
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4. Planning Policy Context

Background

- 4.1. A review of the planning policy context associated with the site and proposed development (at the National level) which are of relevance to the determination of the application are outlined and provided within 'Appendix A – National Planning Policies'. The key provisions of policy at the National Level are however set out below.
- 4.2. A detailed assessment of how the proposed development accords with these policies is provided in Section 6 (Material Considerations) of this Statement.
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National Planning Policy

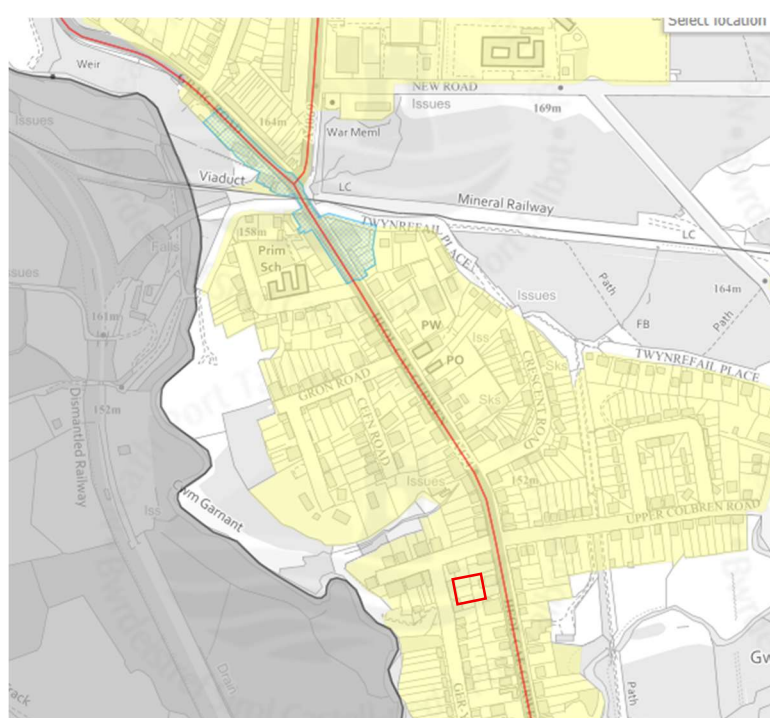
- 4.3. National Planning Policy is set out in the Welsh Government's Planning Policy Wales (PPW), the most recent edition of which was published in February 2024 (Edition 12). It is supplemented by a number of Technical Advice Notes (TANs) which provide additional Government guidance on topic specific matters, including TAN 4: Retail and Commercial Development.
- 4.4. The purpose of PPW is to set out the land use planning policies of the Welsh Government and has the primary objective of ensuring that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.
- 4.5. The Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. In implementing this policy, PPW requires that applicants seeking permission for retail and town centre uses outside of defined town centres demonstrate:
- A need for a proposed retail use. This need may be quantitative, to address a quantifiable unmet demand for the provision concerned, or qualitative, with precedence given to the former particularly as the basis for development plan allocations (para 4.3.15). Considerations that may represent qualitative need are set out in para 4.3.16 and include factors such as:
 - The site being highly accessible by walking, cycling or public transport;
 - The proposal contributing to a substantial reduction in car journeys; or
 - The proposal addressing locally defined deficiencies in provision in terms of quality and quantity, including where it may alleviate a lack of convenience goods provision in a disadvantaged area.
 - Compliance with the sequential test, which means showing that for retail developments proposed on sites outside of defined centres, there is no suitable and available site for a similar development, either in the centre or on its edge; and
 - That the proposal will not have a significant adverse impact on the vitality and viability of the defined centres or investment within them. A retail impact assessment is specifically required for developments of 2,500 sqm gross or more, but TAN4 confirms that retail impact assessments may be required for smaller developments but should be proportionate to potential impacts.
- 4.6. Paragraph 3.3 emphasises the importance of good design in new developments, stating that *"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not solely*
-

concerned with the architecture of individual buildings, but with the relationship between all elements of the natural and built environment, and between people and places. To achieve sustainable development, design must extend beyond aesthetics to incorporate the social, economic, environmental and cultural aspects of a development, including how spaces are used, how buildings and the public realm support those uses, and how development is constructed, operated, managed and integrated with the surrounding area."

Local Planning Policy

- 4.7. The current adopted Development Plan for the Local Planning Authority comprises the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) which was formally adopted by the Council on the 27th of January 2016.
- 4.8. Extracts of the adopted LDP Proposals Map and Constraints Map are provided below:

Proposals Map



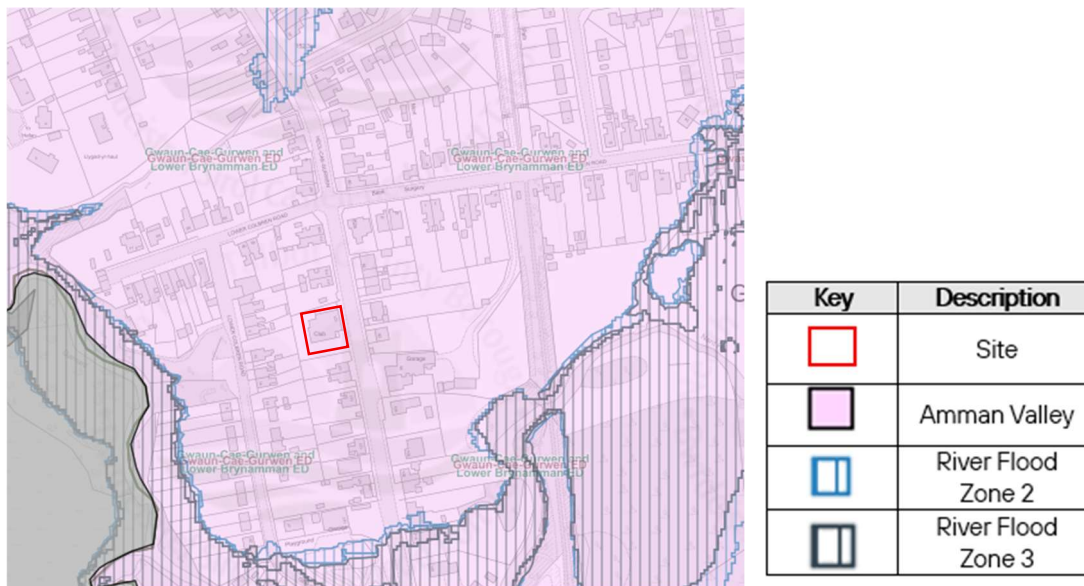
Proposals Map (Approximate Site Location Outlined in Red)

Key	Description
	Site
	Settlement Limit
	Core Road Network
	Local Centre

- 4.9. The LDP Proposals Map (as extracted above) confirms that the site is:

- Located within the Settlement Boundary;
- Located adjacent to the Core Road Network; and
- In close proximity to the Local Centre.

Constraints Map



Constraints Map (Approximate Site Location in Red)

4.10. As per the above LDP Constraints Map, the site is:

- Located in the Amman Valley; and
- Not affected by any Flood Risk Designations.

4.11. Based on the map extracts above, and in consideration of the nature of the proposed development, the policies considered to be of greatest relevance are set out below.

Policy	Title	Summary
Policy SP1	Climate Change	Seeks to address climate change by locating development sustainably, reducing greenhouse gas emissions, promoting renewable and low-carbon energy, and ensuring developments are resilient to the effects of climate change.
Policy SP2	Health	Requires development to contribute positively to physical and mental health by creating safe, accessible environments, promoting active travel, protecting residential amenity, and avoiding unacceptable impacts from pollution or noise.
Policy SP3	Sustainable Communities	Supports development that strengthens sustainable, inclusive communities by providing accessible services, housing, employment and community facilities, particularly within existing settlements.
Policy SP4	Infrastructure	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 acceptable community.
Policy SP12	Retail	Aims to support the County Borough's existing retail centres through the protection and encouragement of retail provision in appropriate locations, together with allowing complementary uses that will enhance retail centres.
Policy SP15	Biodiversity and Geodiversity	Seeks to protect important habitats and sites of geological interest.
Policy SP16	Environmental Protection	Aims to protect air, water and ground quality within the County.
Policy SP20	Transport Network	Promotes sustainable transport choices, prioritising walking, cycling and public transport, while ensuring development does not compromise highway safety or the efficiency of the transport network
Policy SP21	Built Environment and Historic Heritage	Requires development to respect local character and distinctiveness, protect heritage assets, and deliver high-quality design that responds positively to its context.
Policy SP22	Welsh Language	Ensures development protects and, where appropriate, enhances the Welsh language, particularly within identified language-sensitive areas.
Policy SC1	Settlement limits	"Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle."
Policy I1	Infrastructure Requirements	The policy sets out the general principle that any proposal for new development will be expected to meet the infrastructure needs that it generates.

Policy R3	Out of Centre Retail	<i>"Proposals for new retail development or additional retail floorspace within settlement limits but outside the defined retail centres or retail allocations will only be permitted where:</i> <i>1. It is demonstrated that there is a need for the development; and</i> <i>2. The development cannot be accommodated within a defined retail centre and is located in line with the sequential approach; and</i> <i>3. The vitality and viability of existing retail centres will not be undermined taking into account the cumulative effects of other approved retail developments, recently completed developments and plan commitments; and</i> <i>4. The proposal would not undermine the Council's retail hierarchy or any regeneration schemes that the Council has formally approved;"</i>
Policy EN8	Pollution and Land Stability	Proposals with unacceptable impacts on air pollution, noise pollution, light pollution, contamination, land instability and water will not be permitted.
Policy TR2	Design and Access of New Development	The policy sets out that development proposals must ensure the safe and efficient operation of the highway network, provide appropriate parking and cycling facilities with suitable access for service vehicles, and be accessible by a range of transport modes including public transport, walking and cycling.
Policy BE1	Design	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

Supplementary Planning Guidance (SPG)

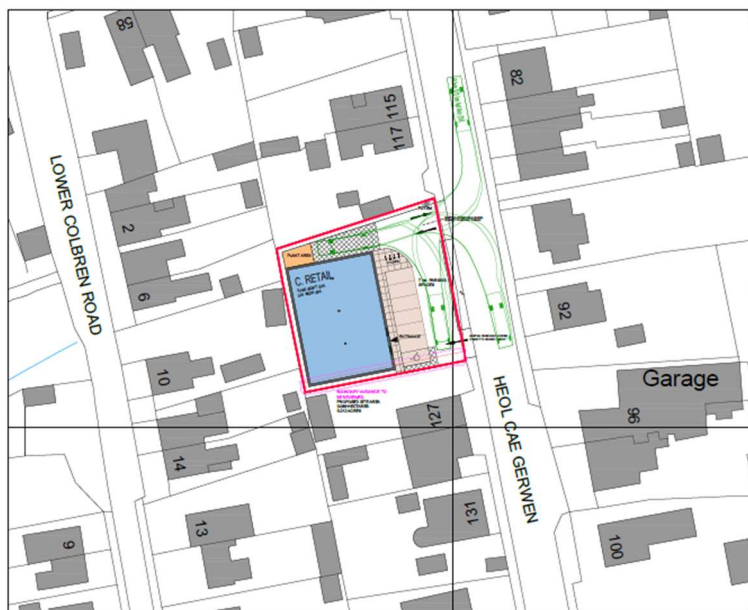
4.12. The key Supplementary Planning Guidance (SPG) which are of relevance to the proposals are noted below.

- Planning Obligations (October 2016);
- Parking Standards (October 2016);
- Biodiversity and Geodiversity (May 2018);
- Pollution (October 2016);
- Design (July 2017); and
- Development and the Welsh Language (July 2017).

5. Pre-Application Advice

Initial Pre-Application Dialogue

- 5.1. An initial Pre-Application Enquiry was submitted to 'Neath Port Talbot County Borough Council' in February 2026. Following this submission, a meeting was held with the appointed Case Officer. During the meeting, it was agreed that additional information could be provided to respond to matters raised by the Case Officer and statutory consultees. The initial consultee comments can be found in full in **Appendix B** and are summarised below.
- 5.2. For ease of reference, the original / first site plan can be found below:



Extract of Original / First Site Layout

Environmental Health

- 5.3. The Environmental Health Officer noted *"No objection to the proposed re-development in principle, subject to the information submitted. The applicant would need to demonstrate that the development would not result in any environmental or public impacts"*

Contaminated Land

- 5.4. In regard to land contamination, the case officer advises that, prior to any development works, it must be established whether the land is contaminated and what measures may be necessary to ensure the site is suitable for its intended use.

Lighting

- 5.5. In regard to lighting, it was noted *"Artificial lighting has the potential to increase artificial lighting levels locally impacting biodiversity and the amenity of nearby dwellings."*

Air Quality & Net Zero

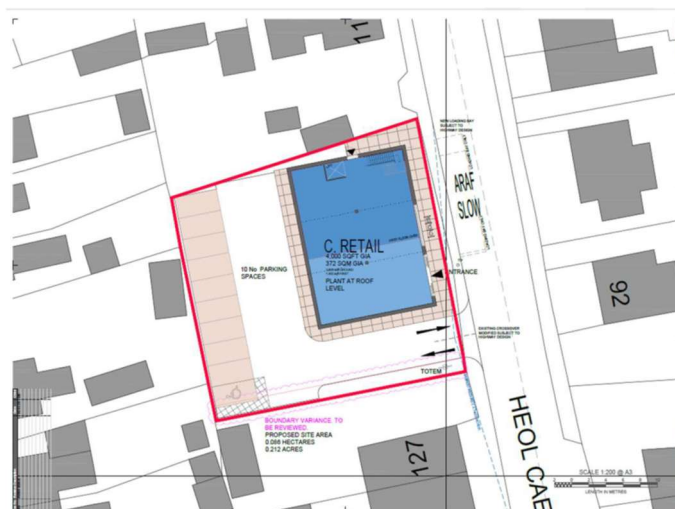
- 5.6. With respect to air quality and net zero, given the nature of the scheme, the Officer noted that *"it is expected that facilities for charging electric vehicles and other ultra-low emission vehicles are provided in accordance with the National Planning Policy Framework. A condition requiring charging points is therefore necessary."*

Highways and Drainage

- 5.7. In regard to highways and drainage the following points were raised:
- In accordance with NPTCBC Parking Standards for a Zone 4 site with a gross floor area of 321 m², the proposal should provide sixteen non-operational parking spaces, two commercial vehicle spaces, one disabled parking space, and appropriate cycle parking.
 - Given the site's location on an A-classified, traffic-sensitive route, parking provision should be sufficient to support the development without reliance on on-street parking.
 - Existing parking activity in the surrounding area is noted, and the proposal should take this into account when considering on-site parking provision.
 - Detailed CAD-based vehicle tracking drawings are required to demonstrate safe and workable manoeuvring within the site.
 - The southern access should be designed to meet the Highway Technical Design Guide, including an access width of 5.5 metres.
 - Vehicular visibility splays of 90 metres in both directions should be demonstrated in line with TAN 18 for a 30mph road, with splays kept clear of obstructions above 600mm.
 - Pedestrian visibility splays of 2.4m x 2.4m should be provided at each access and maintained free from obstructions above 600mm.
- 5.8. It should also be noted that, during the initial pre-application meeting, comments were raised in relation to the site layout, parking provision, alternative sites, and retail need. Detailed submissions were made in response to the issues raised, details and copies of which are provided in **Appendix C**, and is discussed in further detail below.

Parking / Road Frontage

- 5.9. Taking into account the feedback provided at the pre-application meeting in relation to the siting and positioning of the built form, the layout was revised to relocate the store to the main street frontage and to provide an increased level of car parking compared to the original proposal. The revised site plan is provided below for reference.



Revised Site Plan

- 5.10. As shown above, the revised plan provided 10 car parking spaces and repositions the store to the main street frontage, largely within the footprint of the existing building. These changes respond to feedback raised at the meeting in relation to the site's relationship with the road frontage, neighbouring residential properties, and highway matters (including parking and potential overspill). The revised built form also reduced the potential amenity impacts by avoiding development directly to the rear of existing dwellings.
- 5.11. Further to the above, additional research into the site, together with discussions with long-standing local residents, confirmed that the existing building previously operated as a busy social club, particularly at weekends, with regular shows/events taking place. A sketch of the historic arrangement can be found below for reference.



Historic Arrangement

- 5.12. As highlighted within the submitted information, the site historically operated with only four on-site parking spaces, despite the former building being capable of accommodating up to 80 occupants at peak use. In contrast, the proposed Tesco convenience store is expected to generate a significantly lower level of demand, with approximately 10–15 customers at any one time during peak periods. The previous events-based use would also have involved visitors remaining on site for considerably longer than typical short-stay “top-up” shopping trips.

Alternative Potentially Sequentially Preferable Site (Water Street)

- 5.13. The Case Officer raised comments in relation to the availability of an alternative site for the proposed development – Water street former school and Water Streetcar park. However, it should be noted that the former school site has an extant planning (ref: P2022/0726) for the ‘residential development of 10 dwellings with associated parking and works’ which was approved on 12 December 2024.
- 5.14. Following this, contact was made with the site developers, who confirmed: “Our intention is to develop the site for residential houses as per the approved planning.” It is therefore concluded that the Water Street site is not available for alternative (retail) use, nor is there any indication that the developers intend to deviate from the approved residential scheme. As such, this site cannot be considered a suitable, available or viable option for accommodating the proposal. Further details and account on this issue is set out in the sequential site assessment submitted with the planning application, and to accompany the impact assessment.

Retail Need

- 5.15. The need to establish retail demand for the proposed development was discussed at the pre-application meeting and is acknowledged. This matter is further discussed within Section 6 'Material Considerations' of this Statement. Further detail and account on this issue is set out in the submitted retail need and impact assessment prepared by Reeves Retail.
- 5.16. Over and above this, supporting evidence was provided by a letter from E.J. Hales (**Appendix D**), Tesco's long-standing agents in Wales, which confirmed a longstanding and pressing need for a convenience store in this location. The correspondence explained how such sites are identified based on catchment, demographics and existing provision, and confirmed that this area has been a target location for over 15 years. It also confirmed that the proposal is for a small "top-up" format store, that Board approval has been secured, and that the scheme reflects a clear commercial commitment to meeting local demand. Collectively, this evidence demonstrated a clear need and capacity for additional convenience retail provision within the locality.

Nutrients

- 5.17. The issue of nutrients and phosphates was discussed at the pre-application meeting. The additional information noted envisaged that the flows associated with the proposed store will be considerably less than those associated with the lawful use. The drainage works have been undertaken to quantify this and are discussed further in section 6 'Material Considerations of this Statement'

Pre-Application Response

- 5.18. Following the initial consultee responses and the subsequent submission of additional information, the formal pre-application response was issued in March 2026. The full response is provided in **Appendix E** and is summarised below.

Principle of Development

- 5.19. Firstly, the Case Officer notes that the site is located within the defined Settlement Boundary. As such, Policy SC1 confirms that sustainable new development which is proportionate in scale and form to the role and function of the settlement is acceptable in principle, subject to compliance with all other relevant policies and planning requirements.
- 5.20. It is also confirmed that given the sites previous planning history "*the principle of demolishing the existing building has already been established and there is an extant planning permission for a residential development on the site. Therefore, the existing community facility has effectively already been lost and the development proposed is for a new retail store which would serve as a replacement community facility. Therefore there is no objection in principle to the proposals under LDP Policy SC2.*"
- 5.21. The Case Officer raised concerns regarding the location of the proposal, noting that the site lies outside the defined retail centre. It was acknowledged however that Policy SP12 adopts a flexible approach to small-scale, out-of-centre retail proposals within the Valleys Strategy Area.
- 5.22. The Officer stated that as the development is outside of the Retail Centre, the proposal / application "*requires evidence of need for an additional Tesco Express store development as well as evidence that any such need cannot be accommodated within the defined Local Centre or other sequentially acceptable location,*" – in accordance with Policy R3 criterion 1.

5.23. The Officer's report then considered two alternative sites for the proposed development, those being Water Street and the Council owned car park which serves the existing retail centre. In relation to the Water Street site, the Case Officer noted *"notwithstanding the information provided in your emails on 19 February and 2 March, the other landowner's 'intention' to develop the (former school) site is not evidence that the landowner would not consider an alternative development"*.

5.24. In regard to the Council owned car park, it was stated that *"my colleagues in Estates have confirmed that no formal approach has been made to themselves about developing a Tesco Express store on the Council owned car park site on Water Street. Evidence can be gathered by the Council as landowner about the extent of its use to serve the existing retail centre and your comment that its development would lead to diminished trade in the centre itself appears to be speculative rather than based on any empirical evidence or data."*

5.25. The unsuitability of these sites is addressed in detail in the following sections.

Visual Amenity

5.26. In regard to visual amenity, it was concluded that *"The condition of the existing building/site is considered to be detrimental to the appearance of the area and the redevelopment of the site is therefore acceptable in principle."*

Residential Amenity

5.27. In respect of residential amenity, given the site's location within a residential area, the Case Officer stated that *"repositioning the proposed building at the front of the site instead of the back is preferable in order to avoid the store (and any associated noise from deliveries, condenser units etc.) from being in close proximity to these neighbouring properties."* [This has been fully complied with when formulating the end design of this proposal]. The proposed design and layout must accord with LDP Policy BE1 requirements and the Design SPG.

Highway Safety and Drainage

5.28. In terms of Highway Safety, the following points were raised by the Case Officer:

- The development results in a shortfall in parking provision, which is likely to lead to overspill on-street parking;
- The site fronts an A-classified route with limited off-street parking availability;
- The adjacent car garage already generates significant on-street parking, which may be exacerbated by the proposal;
- The submitted vehicle tracking layout is inadequate, with conflicts identified at the footway and kerblines;
- The southern access is substandard and requires widening to 5.5 metres to comply with the Highway Technical Design Guide;
- Vehicle visibility splays of 90 metres in both directions (30mph road) must be demonstrated and kept clear of obstructions exceeding 600 mm; and
- Pedestrian visibility splays of 2.4 m × 2.4 m are required at all accesses, with no obstructions above 600 mm in height.

5.29. In terms of drainage, the following points were raised by the Case Officer;

- SAB approval will be required prior to any work commencing;
- Should any springs or ground water seepage be encountered, the on site works in that area shall cease until a scheme for collection and disposal of the water has been submitted;
- No surface water or Land drainage run-off shall be allowed to connect, either directly or indirectly, to the Highway Drainage system unless otherwise approved in writing by the Local Planning Authority;

- Adequate provision shall be made for the drainage of the site, to ensure that the drainage of any adjoining land is not interrupted or otherwise adversely effected by the development during the life time of construction.

Contaminated Land

5.30. As a former factory was previously located in close proximity to the site, it was noted by the Officer that there is possibility of contamination and made ground being encountered at the site. As such, a desk study will be required to assess the potential pollutant linkages associated with this development and to comply with LDP Policy EN8 and the Pollution SPG.

5.31. Notwithstanding this, given that this was conditioned as part of the previous permission (ref. P2023/0586), it is believed that a suitably worded condition (replicating what was previously conditioned) can address this matter post any permission that may be achieved. As such, a desk study has not been submitted as part of this application – as it is not deemed necessary given the above.

Biodiversity and Ecology

5.32. In regard to biodiversity and ecology, it was noted that bat scoping and emergence surveys were previously undertaken as part of the 2023 extant planning permission, however these are now out of date, and the site will need to be resurveyed. Accordingly, updated ecological surveys have been undertaken re-assess the site and building and to satisfy this.

6. Material Considerations

Key Planning Considerations

6.1. The key planning considerations arising from the proposed development (considering the nature and form of the proposed development and the planning policy context outlined within the preceding section of the Statement) are as follows:

- Principle of Development;
- Design;
- Highways, Access and Parking;
- Retail Need and Impact;
- Residential Amenity;
- Visual Amenity;
- Biodiversity and Ecology;
- Drainage;
- Contaminated Land; and
- Other Considerations

6.2. These issues are discussed in further detail below.

Principle of Development

6.3. First and foremost, the site is located within settlement limits, as defined in the Local Development Plan. LDP Policy SC1 states that sustainable new development that is proportionate in scale and form to the role and function of the settlement will be acceptable in principle, subject to compliance with all other requirements and policies.

6.4. It is also considered that the principle of demolishing the existing building has already been established through the grant of an extant planning permission (app ref. P2023/0586) on the site. This position is supported by the Case Officer, who noted as part of the pre-application process dialogue on this proposal that *"the principle of demolishing the existing building has already been established and there is an extant planning permission for a residential development on the site."*

6.5. *Policy SC2 of the LDP seeks to protect the existing community facilities within Neath Port Talbot., stating:*

"Any proposals which would result in the loss of an important existing community facility will only be permitted where it can be demonstrated that:

- 1. The facility is surplus to requirements; or*
- 2. The existing use is no longer viable."*

6.6. As per the pre-application response, it was confirmed that *"the existing community facility has effectively already been lost and the development proposed is for a new retail store which would serve as a replacement community facility. Therefore there is no objection in principle to the proposals under LDP Policy SC2."* Accordingly, the replacement community facility proposed by this scheme is considered acceptable in principle.

6.7. Policy R3 (Out of Centre Retail Proposals) of the Local Development Plan – the key policy to address – seeks to control proposals for new retail development or additional retail floorspace within settlement limits but outside the defined retail centres. As highlighted earlier within this statement, the site is located outside, but within easy walking distance of, the defined retail centre (approximately five minutes). As such, the proposal will need to satisfy the following criteria:

1. *'It is demonstrated that there is a need for the development; and*
2. *The development cannot be accommodated within a defined retail centre and is located in line with the sequential approach; and*
3. *The vitality and viability of existing retail centres will not be undermined taking into account the cumulative effects of other approved retail developments, recently completed developments and plan commitments; and*
4. *The proposal would not undermine the Council's retail hierarchy or any regeneration schemes that the Council has formally approved;'*

Criterion 1 – Need for Development

6.8. As set out within the Retail Assessment prepared by Reeves Retail, and submitted in support of this application the proposal has demonstrated both a quantitative and qualitative need for the proposed Tesco Express store. Quantitatively, the assessment identifies significant convenience expenditure leakage from the local catchment, with much of this spend currently being directed to larger stores in Pontardawe and Ammanford. The proposed development will therefore reduce trade leakage, and meet an identified operator need for representation in the area.

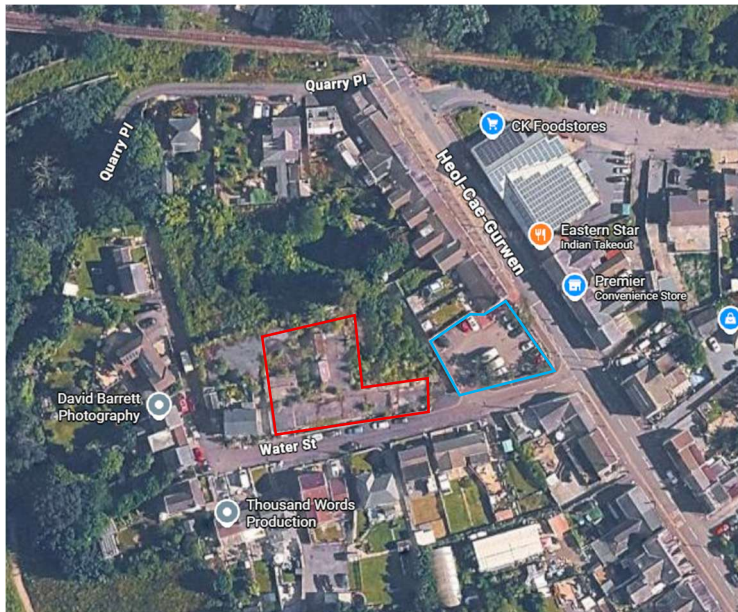
6.9. In qualitative terms, the assessment identifies deficiencies in the existing convenience retail offer, particularly in respect of the availability and choice of fresh food, meat, dairy and bakery products. The proposed Tesco Express would enhance consumer choice and provide a wider range of convenience goods for local residents. It would also strengthen the retail offer within an area of relative deprivation, in a highly accessible location that can be reached by foot, cycle and public transport. Furthermore, the proposal would reduce the need for residents to travel to other centres to meet their day-to-day food shopping needs.

6.10. Further details regarding the identified retail need are contained within the accompanying Retail Assessment. Notwithstanding this, and having regard to the findings summarised above, it is clear that the proposed development would deliver a much-needed convenience retail facility within an area that is currently under-served – in accordance with criterion 1 of Policy R3.

Criterion 2 – Sequential Approach

6.11. First and foremost, the proposed development cannot be accommodated within the defined retail centre, as there are no suitable or available sites. As set out in further detail within the submitted Retail Assessment, and as addressed in **Appendix F** to this statement (Sequential Assessment), both potential sites (discussed further below) are either subject to existing planning permissions, or their development would have adverse impacts on the retail centre.

6.12. At the pre-application stage, two alternative sites were suggested within or adjacent to the defined retail centre – namely sites on Water Street and a Council-owned car park. An aerial image showing both has been extracted overleaf for reference.



Approx. Water Street site location in red, Council owned car parking in blue

- 6.13. Firstly, in respect of the Water Street site, and as set out within the additional information submitted at pre-application stage, contact was made with the developer who secured planning permission app ref. P2022/0726, for the proposed 'Residential development of 10 dwellings with associated parking and works'. This scheme for redevelopment of the site was approved on 12 December 2024. The landowner / developer confirmed in response to our approach and enquiry regarding the availability of the site, the following: "Our intention is to develop the site for residential houses as per the approved planning." It is clear therefore that this site is not available or suitable.
- 6.14. In response to the above, the Case Officer stated that "Notwithstanding the information provided in your emails of 19 February and 2 March, the other landowner's 'intention' to develop the (former school) site is not evidence that the landowner would not consider an alternative development, particularly as no construction has commenced on the extant housing development permission".
- 6.15. With respect, it is considered that this places an unreasonable, evidential burden on the applicant. Clear confirmation was provided by the developer that they intend to implement the extant residential permission, which was granted following recent determination and following a lengthy and protracted planning process. The expectation that the applicant should further explore or promote alternative commercial uses on land controlled by an unrelated third party—particularly where that landowner has an active and approved development proposal—is neither practical nor proportionate. As such, it is reasonable to conclude that the Water Street site is not available or suitable as a sequentially preferable alternative.
- 6.16. In respect of the Council-owned car park on Water Street, this site functions as a / the key public parking facility serving the defined retail centre of Gwaun Cae Gurwen. Its redevelopment would result in the significant loss of essential parking provision that supports the hierarchy, accessibility, and functioning of the centre. The removal of this facility would be likely to undermine the vitality and viability of the retail centre, contrary to the objectives of Policy R2. In particular, Criterion 1, which seeks to ensure that development within designated centres "enhances the vitality, viability and attractiveness of the centre". The loss of this car park would fail to meet these requirements and therefore this site cannot be considered a suitable or sequentially preferable alternative.
- 6.17. In this instance, where there are no suitable, available, or viable sites within centres, Technical Advice Note 4 (Retail and Commercial Development) sets out (in section 7.1) that : "If no suitable sites are available in retail and commercial centres then edge-of-centre locations should be considered, with preference given to

brownfield sites that are or will be well connected to the existing centre and accessible by a variety of means of transport, particularly walking, cycling and public transport."

- 6.18. It is of course the case that the site is a brownfield site, is occupied by a commercial premises, and is well connected to the existing centre and accessible by a variety of means of transport, particularly walking, cycling and public transport. As such, the site and proposals are wholly compliant with TAN4.
- 6.19. It is therefore concluded that there are no alternative, potentially sequentially preferable sites located in a more sustainable location than the application site. As such, the proposed development is fully in accordance with Criterion 2 and National Planning Policy.

Criterion 3 - Impact on Existing Retail Centre

- 6.20. The application site comprises an existing commercial facility and, as set out above, is readily accessible from the local centre via a direct, level and convenient pedestrian route, with footways provided on both sides of the road. The proposal would provide a local convenience retail facility focused on meeting day-to-day shopping needs and is not expected to draw significant footfall or trade from the existing centre. Rather, as demonstrated within the Retail Assessment, trade diversion is anticipated primarily from larger food stores located outside the immediate catchment area, reflecting the current leakage of convenience expenditure from the locality.
- 6.21. As such, having regard to the role and function of the proposed Tesco Express as a local convenience store serving day-to-day shopping needs, it is considered that the vitality and viability of existing retail centres would not be undermined – in accord with criterion 3.

Criterion 4 - Retail Hierarchy

- 6.22. In respect of Criterion 4, research undertaken has identified no known investment or regeneration proposals that would be prejudiced by the development. Furthermore, the proposed Tesco Express, would serve a local convenience function and help retain expenditure within the settlement – avoiding conflict with the established retail hierarchy. Accordingly, the proposal is compliant with Criterion 4.
- 6.23. In light of the matters set out above, it is considered that the principle of development for a Tesco Express facility on the site is acceptable, and fully compliant with both National and Local Planning Policy.

Design

- 6.24. The proposed development will demonstrate the highest possible standards of design, as set out within Policy BE1 (Design), which notes *"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."* The key creations of have been extracted below for reference.
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.'*

6.25. Further information on how the proposal accords with the criteria can be found within the 'Design and Access Statement' prepared by Inspire Design. That said, for ease of reference, the key design credentials for the proposals have been discussed in detail below.

6.26. As set out within the DAS submitted in support of this application, the mix of uses and styles in the immediate context of the site offers a distinctive variation in form and materials in constructions that generally rise to a maximum of two stories. The material palette of the surrounding area is varied, comprising buff brick, stone, smooth and rough render in residential buildings, alongside examples of brick, render and metal cladding within nearby commercial development. Accordingly, the proposed development has been designed to be contextually appropriate, basing its architectural proportions, scale and form from the surrounding properties, thereby in accordance with criteria 1, 2 and 3 of LDP Policy BE1.

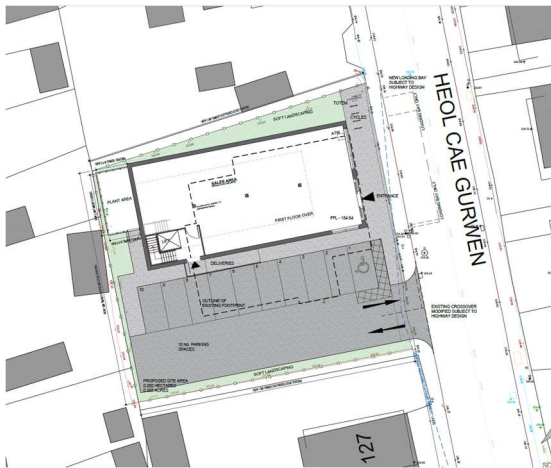
6.27. The revised site layout has been carefully designed to provide safe and efficient vehicular and pedestrian access to and within the site. The proposed arrangements ensure there will be no significant adverse impacts on highway safety or the amenity of neighbouring occupiers. Residential properties surround the site, with the closest being the gable of a property to the north at approximately 14m, 19m to the east, and properties at Nos. 90 and 92 on the opposite side of Heol Cae Gurwen located circa 20m to the south. To the west, the gable of No. 127 lies approximately 23m away, while rear elevations on Ger-Yr-Afon are also set at a similar distance.

6.28. All surrounding dwellings are two-storey in form, typically with eaves heights of around 5m, and comprise pitched roof designs with a mix of brick, stone and rendered finishes. Appropriate separation distances, site levels and boundary treatments have been incorporated to safeguard residential amenity, ensuring that the development does not result in unacceptable impacts upon the surrounding community. As such, the proposal satisfies Criteria 4 and 5.

6.29. The plans and visuals of the proposed development can be found below for reference:



Indicative perspective view. NTS

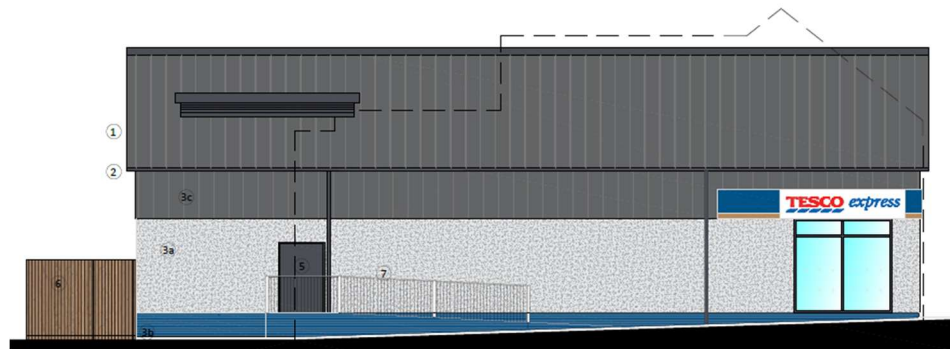


Extract of Proposed Site Plan

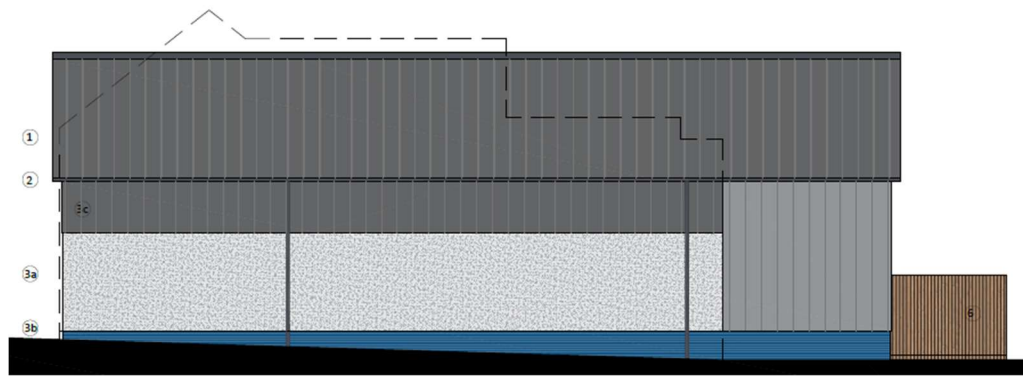


Proposed Front Elevation (East)

Rear Elevation (West)



Proposed Side Elevation (South)



Proposed Side Elevation (North)

6.30. As shown in the above plans, the proposal comprises a dark grey metal-clad roof, with a rough-cast render finish forming the main elevation material. The upper wall is clad in a matching material to the roof, helping to further break down the visual proportions of the elevations. A blue base detail follows the site's natural topography, with timber fencing positioned along the western elevation. The proposed material palette has been extracted from the submitted Design and Access Statement and is set out below:



1. Rough Cast Render
Colour White



2. Coated profiled metal
wall sheet. Color Dark
grey



3. Plinth in contrasting
blue bricks



4. Fascias and soffit powder
coated aluminium Dark grey
roofing.



5. Coated profiled metal
roofing sheet. Color
Dark Grey



6. Aluminium shop front
window system
Color Dark Grey

6.31. As shown on the eastern elevation, the street-facing elevation comprises a glazed glass frontage facing onto the public area. CCTV and lighting will be installed to illuminate the shopfront, incorporating both natural surveillance and CCTV within areas of public movement - thereby creating an inviting and attractive safe place, in line with Criterion 6.

6.32. Criterion 7 of the policy requires developments to promote *"the interests of pedestrians, cyclists and public transport and ensure linkages with the existing surrounding community"*. As set out previously within this statement, a bus stop is located on the road corridor which the site fronts. The site is also accessible to and from the local centre via a flat, straight and convenient route, benefiting from pedestrian footways on both sides of the road. In addition, cycle parking measures have been incorporated into the scheme, further promoting sustainable transport. As such, it is considered that the site is located in an area which promotes the use of existing sustainable transport modes.

6.33. Criterion 8 of the policy promotes the efficient use of resources through the following measures:

- 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.'*

(GJP Emphasis)

- 6.34. As detailed within this Statement, the site comprises previously developed (brownfield) land, formerly occupied by a commercial premises. The proposed redevelopment therefore represents an efficient and effective use of available land, making use of a sustainable brownfield site.
- 6.35. Furthermore, the front and side elevations of the proposed store incorporate a glazed frontage. This design approach maximises opportunities for natural daylight and solar gain, while reducing perceived massing along the street frontage and introducing an active and attractive location.
- 6.36. It is therefore considered that the proposals are wholly in accordance with Criterion 8.
- 6.37. In regard to Criterion 9 (drainage), the proposals have been prepared to limit surface water run-off, manage flood risk and prevent pollution. This is addressed in further detail within the submitted Drainage Strategy Report, as well as in the drainage section of this Statement below.
- 6.38. The final criterion of Policy BE1 seeks to ensure that the layout and design of development are inclusive and accessible to all users. The proposed development has been designed with this objective in mind and will incorporate step-free access throughout. In addition, automatic entrance doors will be provided to ensure that the building can be accessed easily and safely by all members of the community.
- 6.39. Notwithstanding the above assessment, the pre-application Case Officer acknowledged that the current condition of the site is sub-optimal, noting that it is *"considered to be detrimental to the appearance of the area and the redevelopment of the site is therefore acceptable in principle"*. Any development would therefore be an improvement on the design.
- 6.40. In light of the above, it is considered that the proposed development integrates well within its surrounding context, and will deliver a significant improvement when compared to the existing condition of the site.
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Highways, Access and Parking

- 6.41. In terms of highways, Access and Parking, the site benefits from an established access point of Heol Cae Gurwen which served the former club. The intention is therefore to upgrade the existing access point to serve the proposed development, and to close the second existing access to the northern side of the site (resulting in a rationalisation of the points of access and vehicular movements to and from the site).
- 6.42. A Transport Statement has been produced by Acstro to support the planning application, and should be read in conjunction with this Statement accordingly.
- 6.43. The site is located on Heol Cae Gurwen, which forms part of the A474, the main distributor road linking Pontardawe and Ammanford. The street is subject to a 30mph speed limit, is straight, and has street lighting and footways on both sides. There are no parking restrictions in the vicinity of the site. On-street parking levels are not significant as all of the properties to the immediate north and south, on both sides of the street, have off-street parking. Accordingly, it is considered that the site is accessible to pedestrians, cyclists and public transport users.
- 6.44. The development proposes a total of 10 parking spaces, including one designated for blue badge holders to the south of the store. It is acknowledged that the Council's Parking Standards recommend the provision of 14 parking spaces (based on a ratio of 1 space per 20m²), resulting in a shortfall of four spaces. However, on-street parking in the vicinity of the site is relatively limited due to the availability of off-street parking for surrounding properties. As such, it is considered that the shortfall of four spaces, when assessed against the

Parking Standards, can be appropriately accommodated through on-street parking without adversely impacting the local highway network.

- 6.45. Furthermore, an assessment of the likely hourly trip generation of the proposed convenience store has been undertaken, based on data from comparable stores across the UK. This enables the anticipated hourly parking accumulation associated with the development to be estimated. The assessment indicates that parking demand will be 10 spaces or fewer throughout most of the day, with a peak demand of 11 spaces occurring during the hour between 16:00 and 17:00. This demonstrates that the proposed provision of 10 parking spaces will be sufficient to accommodate demand for the majority of the day. During the brief peak period, a maximum overspill of one vehicle may occur, which could be accommodated on the surrounding highway without resulting in a material impact.
- 6.46. The TRICS data indicates that the proposed convenience store is expected to generate approximately 55 to 66 vehicle movements during peak hours. However, the majority of these trips would not represent new traffic on the local highway network. Instead, they are likely to consist predominantly of pass-by trips, where customers incorporate a visit to the store into an existing journey. Research into the breakdown of trip types is provided in the TRICS Report 95-2 – Passby & Diverted Traffic, and states that primary or new trips account for only a small proportion, up to 8%, of traffic generated by a new retail development. Based on this research a robust approach has been taken with the presumption that new trips will account for no more than 10% of the development's overall trip attraction volume. On that basis the development can be expected to only generate some 5 to 6 new peak hour vehicle movements. As such, the development is not anticipated to result in a significant increase in traffic volumes or to have a material impact on the operation of the local highway network – particularly given Heol Cae Gurwen's Core Road Network status.
- 6.47. In terms of deliveries to the store, there is insufficient space within the site to accommodate delivery vehicles entering, turning, and exiting in a forward gear. As such, servicing will take place from the kerbside. This approach is consistent with the former use of the site, where deliveries to the private members' club were also undertaken from the kerbside. It also reflects the arrangements for the majority of businesses along Heol Cae Gurwen, many of which do not benefit from off-street servicing facilities. Kerbside deliveries are therefore a common and established practice in the area, and it is considered that this arrangement would not give rise to any adverse impacts.
- 6.48. Access to the store's car park will be provided via a vehicle crossover across the existing footway. Visibility splays measuring at least 2.4m x 90m can / will be achieved in both directions.
- 6.49. During the pre-application process, the Case Officer provided initial observations in relation to highway matters. In light of the above, and the information provided within the Transport Statement, it is considered that these have been satisfactorily addressed, and the proposal is not expected to result in any adverse impacts on the highway network.

Retail Need and Impact

- 6.50. The submitted Retail Need and Impact Assessment prepared by Reeves Retail Planning Consultancy identifies a clear need for the proposed Tesco Express store, both in quantitative and qualitative terms. The assessment concludes that the convenience retail offer within Gwaun-Cae-Gurwen and the surrounding catchment is currently limited, with existing provision predominantly comprising small-scale convenience stores offering a restricted range of day-to-day food shopping goods, particularly fresh fruit and vegetables, meat, dairy and bakery products. As a result, a significant proportion of local convenience expenditure is currently directed to larger food stores in Pontardawe, Ammanford and, Garnant.

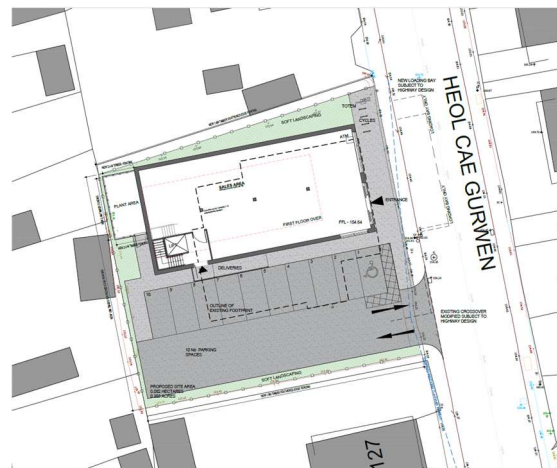
- 6.51. The assessment estimates that the primary catchment has a population of approximately 4,280 persons and generates in the region of £11.56 million of annual convenience goods expenditure. However, existing stores within the catchment are currently retaining less than one-third of this expenditure, resulting in substantial expenditure leakage to competing centres outside the locality. The proposed Tesco Express would therefore help retain spending within the local area, improving the sustainability of local shopping patterns and addressing an identified quantitative need for additional convenience retail provision.
- 6.52. In qualitative terms, the assessment identifies deficiencies in both the range and quality of convenience shopping currently available to local residents. The proposed development would provide access to a broader choice of convenience goods, including a significantly enhanced fresh food offer, whilst reducing the need for residents to travel to larger centres to meet their everyday shopping requirements. The proposal would also provide a modern convenience retail facility within an area identified as experiencing relatively high levels of deprivation and in a location that is readily accessible by foot, cycle and public transport.
- 6.53. In addition to the above, there is further evidence of leakage of expenditure from the area, with the community providing a charity-run bus service to transport residents to other nearby centres. It is also clear that the existing food stores in the vicinity are over-trading relative to their expected position.
- 6.54. It should also be noted that Gwaun-Cae-Gurwen has represented a longstanding operational requirement for Tesco, with the operator confirming that it has sought representation within the settlement for a number of years but has been unable to secure an appropriate site (please see **Appendix D** - E.J. Hales Letter). The proposal would therefore meet both an identified operator requirement and a locally evidenced retail need.
- 6.55. In light of the details set out above, it is evident that there is a demand for further retail floor space within Gwaun Cae Gurwen.
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Residential Amenity

- 6.56. As shown on the site layout, the store has been positioned to avoid and design out any overlooking in respect to the existing residential properties that bound the site (to the north, south and west).
- 6.57. The store has been sited to ensure that no habitable room windows impact on neighbouring residential properties. As such, it is considered that the development will not give rise to any adverse overlooking or loss of privacy impacts. Moreover, this is a considerable betterment over the existing arrangement, where multiple windows in the side and rear elevations of the existing club building, including a number at first floor look directly over and into the residential curtilage of a number of dwellings.
- 6.58. It was also noted by the Case Office that, *"The application site is surrounded on three sides by existing residential development therefore repositioning the proposed building at the front of the site instead of the back is preferable in order to avoid the store (and any associated noise from deliveries, condenser units etc.) from being in close proximity to these neighbouring properties"*.



Comparison of Original (Pre-Application)



Revised Sit Plan

- 6.59. As shown on the revised site plan, the built form has been repositioned further away from the residential properties to the rear of the site, and brought forward to reinforce the existing street frontage. This siting has been carefully considered to minimise the potential for noise and disturbance, and to avoid giving rise to any adverse impacts on neighbouring residential properties to the north and west. This included the provision of a landscape strip along the northern side of the building, together with a privacy fence etc. These, alongside the separation of the site from the dwelling to the north side by a large side garden area, and range of outbuildings, will ensure no adverse impact on the property to which it will be the closest to.
- 6.60. All deliveries will be undertaken during normal operating hours, between 06:00 and 23:00, to minimise the potential for noise disturbance during unsociable hours. Notwithstanding this, we recognise that conditions can be imposed to safeguard amenity during delivery times.
- 6.61. It is considered accordingly that the development will not give rise to any issues in regard to amenity – particularly given the revised layout.

Visual Amenity

- 6.62. With regards to Visual Amenity, the current building that occupies the site is run-down and littered, and in a condition that is determinately affecting the character of the surrounding area. Images of the current condition of the site can be found below.



Current Condition of the Site

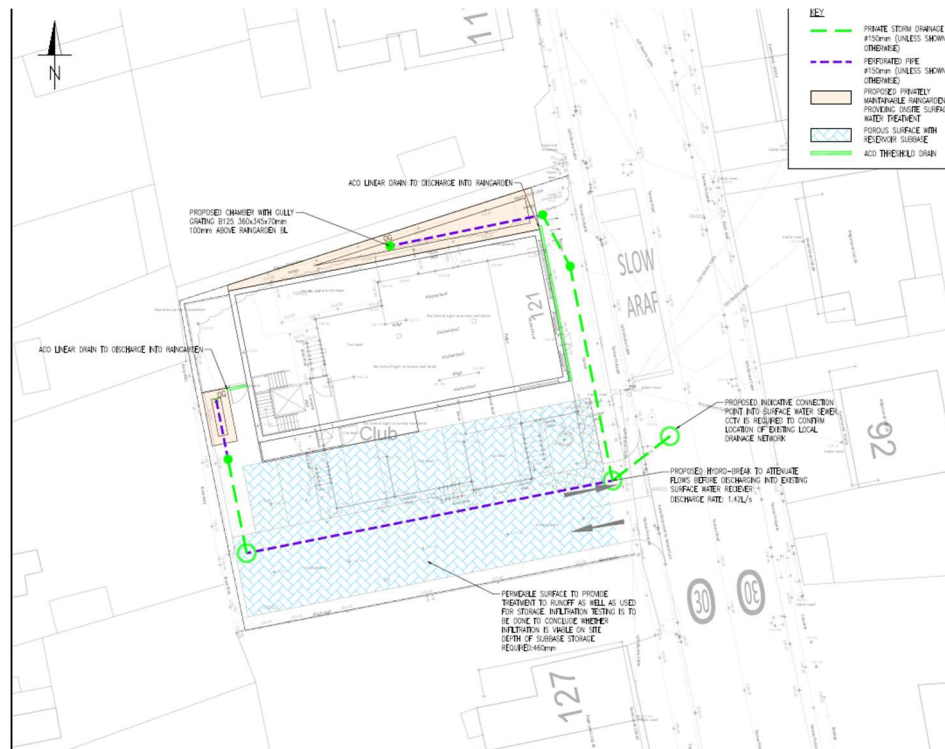
- 6.63. In respect of visual amenity the pre-application response noted " *The condition of the existing building/site is considered to be detrimental to the appearance of the area and the redevelopment of the site is therefore acceptable in principle. No elevation plans have been provided for comment but a well-designed road frontage development is preferable to the original proposal for a building to be erected at the rear of the site.* "
- 6.64. In light of the above, it is considered that the development will bring a much-needed visual betterment to the site and surroundings, as such it is considered acceptable in this regard. The appropriate, and high-quality design of the proposed building is addressed earlier in the Design sub-section of this statement.
-

Biodiversity and Ecology

- 6.65. With regard to ecology, an initial Preliminary Ecological Appraisal (PEA) comprising an Extended Phase 1 Habitat Survey and Daytime Bat Walkover has been undertaken by Gould Ecology Ltd on the 5th of May 2026, with further bat surveys scheduled to be carried out in due course. It should also be noted that Gould Ecology previously undertook ecological assessments in relation to the earlier application at the site (ref. P2023/0586).
- 6.66. The survey identified a number of small gaps and cavities within the existing building which could provide roosting opportunities for bats, and the structure is therefore considered to have moderate suitability for bat roosts. Boundary vegetation, including hedgerows, also has potential to support nesting birds during the breeding season. In addition, evidence of house sparrow nesting was recorded within a soffit gap on the north-west corner of the building.
- 6.67. In light of these findings, further bat surveys (comprising two dusk emergence surveys) have been commissioned to establish the presence or likely absence of roosting bats. Any demolition works will be undertaken outside of the bird nesting season (typically March to August inclusive), unless a pre-commencement check confirms the absence of active nests.
- 6.68. It should be noted that these findings are consistent with those found in the initial survey undertaken in 2022, in which it was found that there was no evidence of bats in any part of the building.
- 6.69. Notwithstanding the above, any loss of ecological features and biodiversity within the site (including the removal of vegetation) will be appropriately mitigated through replacement planting and ecological enhancements. These measures - which are discussed further in the accompanying Green Infrastructure Statement - ensure that the development delivers a net benefit for biodiversity, in accordance with the aims and objectives of Planning Policy Wales.
- 6.70. Whilst the forthcoming bat survey results will provide further confirmation of the presence of roosting bats within the building, it is noted that no evidence of bats was identified in the previous 2022 survey undertaken in support of application ref. P2023/0586. It is considered that the proposed development can appropriately mitigate any potential impacts on species. Furthermore, the inclusion of biodiversity enhancement measures will deliver an overall improvement to the ecological value of the site. As such, the development can and will achieve a biodiversity net gain.
-

Drainage

- 6.71. The submitted drainage scheme confirms that suitable foul water, surface water and land drainage arrangements can be achieved. The scheme also demonstrates compliance with SAB (SuDS Approval Body), approval of which will be sought in due course. An extract of the proposed drainage plan can be seen overleaf for reference.



Drainage Strategy Plan

- 6.72. In regard to foul drainage, the application site is served by an existing connection into the public sewer. The public sewer serving the application site discharges into Garnswllt Wastewater Treatment Works which discharges into River Loughor. This is proposed to be maintained subject to a review of the condition of the drainage system.
- 6.73. It is understood that the former use of the site could typically accommodate an average of approximately 30 persons at any given time. In contrast, the proposed store would employ circa 5 staff members. On this basis, the proposed redevelopment would result in a reduction in occupancy and associated nutrient output. The development therefore achieves a betterment factor of 1.40 in respect of total nitrates and achieves nutrient neutrality.
- 6.74. Whilst detailed surface water drainage proposals will be finalised and submitted following any grant of planning permission, it is recognised that the proposed redevelopment exceeds 100m² and will therefore be subject to full SAB approval. It is considered that the scheme can be designed to incorporate appropriate sustainable drainage measures in accordance with the relevant standards and requirements.
- 6.75. To conclude and as outlined in the Drainage Strategy Report, the proposed drainage systems have been designed to deliver a robust and easily maintainable solution, with each element located in the most suitable parts of the site to support effective long-term surface and foul water management.
- 6.76. Accordingly, it is considered that the proposal includes appropriate and sufficient drainage measures.

Contaminated Land

- 6.77. Given that a former factory was previously located in close proximity to the site, the Case Officer at the pre-application stage identified the potential for contamination and made ground to be present. As such, a desk study would typically be required to assess any potential pollutant linkages associated with the development and to ensure compliance with LDP Policy EN8 and the Pollution SPG.
- 6.78. However, it is noted that this matter was addressed by condition as part of the previous planning permission (ref. P2023/0586). On this basis, it is considered that a suitably worded planning condition (replicating that previously imposed) can adequately deal with any contamination risks following the grant of permission. Accordingly, a desk study has not been submitted as part of the current application, as it is not considered necessary at this stage.

Other Considerations

Public Rights of Way

- 6.79. As shown in the map overleaf, there are no public rights of way in proximity to the site.



Public Right of Way Map (site outlined in red)

- 6.80. Accordingly, public rights of way are not considered to present a constraint to the proposed development.

Heritage

- 6.81. The Historic Map for Wales confirms that the site is not itself is not listed, nor is it neighboured by any heritage assets. Accordingly, it is considered that the proposal will not have any unacceptable heritage impacts.

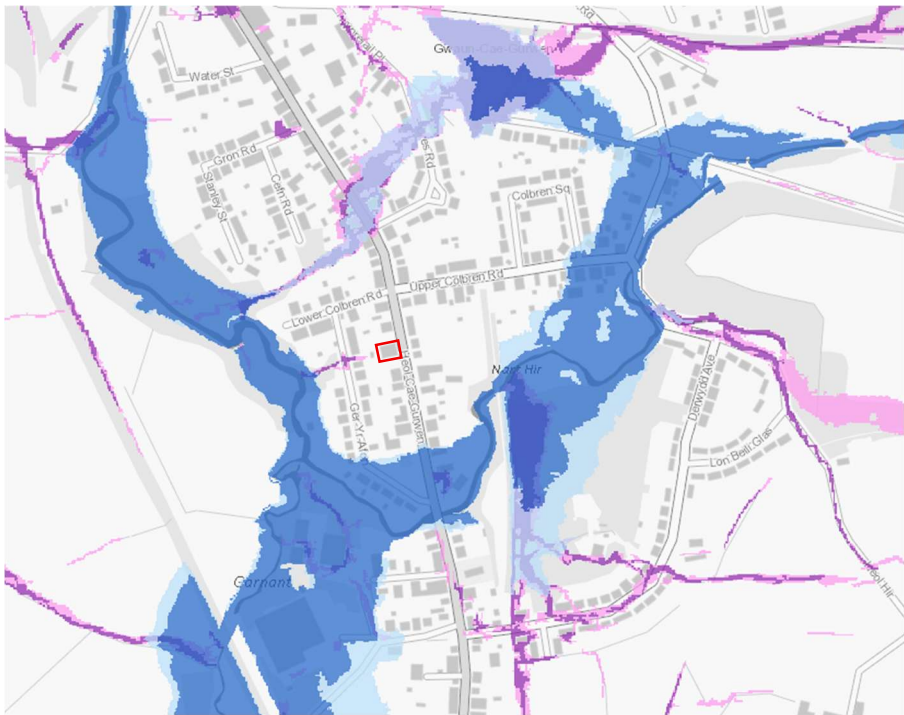


Key	
	HER
	National Monument Records of Wales

Historic Wales Map (approximate site outlined in red)

Flood Risk

6.82. The flood risk map below confirms the site is not located within any designated flood zones, therefore flood risk will not pose a constraint on the development.



NRW Flood Risk Map (Approximate site outlined in red)

Key			
	Flood Zone 2-Rivers		Flood Zone 3-Surface Water and Small Watercourses
	Flood Zone 3-Rivers		Flood Zone 2-Surface Water and Small Watercourses

7. Summary and Conclusions

Summary

- 7.1. This Planning Statement outlines the context within which the full application is made, provides a detailed examination of the main planning considerations raised by the proposals, together with a reasoned justification in support of the proposed development.
- 7.2. The proposed development seeks full planning permission for the demolition of the former club building and its redevelopment of a Tesco Express store
- 7.3. The proposal is considered to be policy compliant and both appropriate and acceptable:
- The principle of development is acceptable, with the site located within the settlement boundary where sustainable development is supported by Policy SC1, and the principle of redevelopment already established through an extant planning permission;
 - The proposal will deliver a much-needed Tesco Express store, addressing both quantitative and qualitative retail need identified within the submitted Retail Assessment;
 - The development will reduce expenditure leakage from the local area, improve access to fresh food and convenience goods, and reduce the need for residents to travel to larger centres for day-to-day shopping;
 - The proposal satisfies the requirements of Policy R3, with no suitable or available sequentially preferable sites identified within the defined retail centre;
 - The development will not undermine the vitality or viability of existing retail centres, with trade diversion expected to come primarily from larger stores outside the immediate catchment area;
 - The proposal will not undermine the Council's retail hierarchy, and no approved regeneration or investment schemes will be prejudiced by the development;
 - The site occupies a highly sustainable brownfield location within easy walking distance of the village centre, with excellent pedestrian, cycle and public transport connections;
 - The proposal will regenerate a long-standing vacant and derelict brownfield site, bringing previously developed land back into productive use;
 - Significant visual betterment will be achieved through the demolition of the existing dilapidated building, which has been identified as being detrimental to the appearance of the area;
 - The proposed building is lower in height and reduced in massing compared to the existing structure, providing a high-quality development that integrates well with the surrounding streetscape;
 - The layout and design have been carefully developed to avoid overlooking and loss of privacy, with no adverse impacts upon neighbouring residential properties anticipated;
 - The revised siting of the building moves activity away from neighbouring dwellings, providing further protection for residential amenity and reducing the potential for disturbance; and
 - The site is not affected by any flood risk, heritage, or public rights of way designations.
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Conclusion

- 7.4. Having regard to the above material considerations, it is considered that the proposed development represents an appropriate and policy compliant scheme.
- 7.5. Accordingly, it is therefore considered that the proposed development is acceptable, and we would respectfully request that the full application be approved.
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GJP.

**Planning &
Development
Consultancy**