



GRANDISON BROOK FLOOD ALLEVIATION SCHEME

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Client signoff

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1. Introduction

AtkinsRéalis is instructed to seek full planning permission on behalf of Neath Port Talbot Council (NPTC) for the proposed GRANDISON BROOK FLOOD ALLEVIATION SCHEME (hereafter, referred to as 'the Proposed Development') associated with Grandison Brook in the Pantyrheol area of Briton Ferry.

The Pantyrheol area of Briton Ferry is subject to periodic flooding due to the insufficient capacity of the Grandison Brook culvert. During heavy rainfall, flows exceed the culvert's capacity, causing water to surcharge at culvert inlets and drainage connections. This results in overland flows that travel downhill, collect on the A474, and lead to internal flooding of nearby residential and commercial properties. The objective of the Proposed Development is therefore to increase the hydraulic capacity of the watercourse and thereby reduce the risk of flooding.

The planning application site (hereafter referred to as 'the Site') lies within NPTC's administrative area. The Proposed Development exceeds one hectare, necessitating the preparation of a Planning, Design, and Access Statement (PDAS) to support the planning application. This PDAS describes the Proposed Development and the Site, details stakeholder consultations, and assesses how the Proposed Development conforms to planning policy.

1.1 Content of the Planning Application

The planning application comprises this PDAS, as well as the supporting documents listed below, and the drawings set out in Table 1-1.

- Application Form
- Planning Design and Access Statement (this document)
- Environmental Impact Assessment (EIA) Screening Opinion
- Ecological Impact Assessment (July 2022, updated in July 2025)
- Bat Roost Reports (27th February 2026 and 20th April 2026)
- Tree Survey Report (October 2025 and 16th April 2026)
- Ground Investigation Report
- Construction Traffic Management Plan (CTMP)
- Green Infrastructure Statement
- Flood Consequences Assessment
- Heritage Desk-based Assessment
- Heritage Impact Statement
- Water Framework Directive (WFD) Assessment
- Pre-application Consultation Report

Table 1-1 - Application Drawings

Drawing reference	Title	Revision	Scale	Date Issued
NE05_001-ATK-GEN-DR-CD-000001	Proposed Scheme Overview (Sheet 1 of 2)	P01	1:1250	03/26
NE05_001-ATK-GEN-DR-CD-000002	Proposed Scheme Overview (Sheet 2 of 2)	P01	1:2500	03/26



Drawing reference	Title	Revision	Scale	Date Issued
NE05_001-ATK-GEN-DR-CD-000010	Proposed Scheme Overview Sheet 1 of 2	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000011	Proposed Scheme Overview Sheet 2 of 2	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000012	Plan and Long Section - Sheet 1	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000013	Plan and Long Section - Sheet 2	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000014	Plan and Long Section - Sheet 3	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000015	Plan and Long Section - Sheet 4	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000016	Plan and Long Section - Sheet 5	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000017	Plan and Long Section - Sheet 6	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000020	Plan and Long Section - Sheet 7	P01	1:100	03/26
NE05_001-ATK-GEN-DR-CD-000021	Plan - Sheet 8	P01	1:25	03/26
NE05_001-ATK-GEN-DR-CD-000022	Inlet Structure - Cul_0015 - General Arrangement	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000070	Inlet Structure - Cul_0015 - Proposed Details Sheet 1 of 2	P01	1:50	03/26
NE05_001-ATK-GEN-DR-CD-000071	Inlet Structure - Cul_0015 - Proposed Details Sheet 2 of 2	P01	1:50	03/26
NE05_003-ATK-GEN-DR-CD-000073	SW MH21 - General Arrangement Plan	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000120	SW MH21 - Proposed Details Sheet 1 of 1	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000130	Brook Court - SW MH19 -SW MH20 Cross Sections	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000140	Retaining Wall at NR Culvert (NR ID SDI1 207 01) - General Arrangement and Sections	P01	1:100	03/26
NE05_001-ATK-GEN-DR-CD-000200	Culvert Repairs at NR Culvert (NR ID SWM2 206 78) - General Arrangement and Details	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000201	Brook Court - DCWW Foul Sewer Diversion - General Arrangement	P01	As shown	03/26



Drawing reference	Title	Revision	Scale	Date Issued
NE05_001-ATK-GEN-DR-CD-000202	Typical Details - Sheet 1 of 3	P01	As shown	03/26
NE05_001-ATK-GEN-DR-CD-000310	Typical Details - Sheet 2 of 3	P01	1:250	03/26
NE05_002-ATK-GEN-DR-CD-000311	Typical Details - Sheet 3 of 3	P01	1:250	03/26
NE05_003-ATK-GEN-DR-CD-000312	Jersey Park - Below Ground Attenuation General Arrangement Sheet 1 of 2	P01	1:125	03/26
NE05_004-ATK-GEN-DR-CD-000313	Jersey Park - Below Ground Attenuation General Arrangement Sheet 2 of 2	P01	1:125	03/26
NE05_005-ATK-GEN-DR-CD-000314	Jersey Park - Below Ground Attenuation - Sections Sheet 1 of 2	P01	As shown	03/26
NE05_006-ATK-GEN-DR-CD-000315	Jersey Park - Below Ground Attenuation - Sections Sheet 2 of 2	P01	As shown	03/26

1.2 EIA Screening

EIA screening of the Proposed Development is required because the Site exceeds 1ha. An EIA screening exercise was undertaken in August 2024. NPTC, as the local planning authority, adopted an EIA screening opinion on 13th September 2024, confirming that the Proposed Development did not constitute EIA development (LPA ref P2024/0533).

After the adoption of the aforementioned negative EIA screening opinion, and following the receipt of comments from Cadw, a request was made for a second EIA screening opinion. The LPA adopted a second EIA screening opinion on 27th January 2025 (LPA ref. P2024/0811) confirming that the Proposed Development does not constitute EIA development.

2. Project Context

2.1 Site Context

The Proposed Development is located within Briton Ferry, falling entirely under the jurisdiction of NPTC. Briton Ferry lies approximately 8 km northeast of Swansea and 3 km south of Neath. The Proposed Development is set predominantly within the residential zones of Briton Ferry, encompassing key infrastructure, community facilities, and undeveloped areas.

The Site includes a range of notable features, such as a large cemetery on Ynysmaerdy Road, Ysgol Carreg Hir school, and multiple outdoor recreational facilities. These facilities comprise a public park, a bowling green, sports clubs for rugby and cricket, football pitches, and allotments. Additionally, the Site contains undeveloped scrubland that was previously used as a railway maintenance yard. Critical transport infrastructure also forms part of the Site, including the main A474 road and sections of railway, such as the South Wales Main Line and the Swansea District Line (primarily freight).



Beyond the planning application Site to the south lies a park and woodland. Briton Ferry is positioned to the east of the River Neath, which flows along a northeast to southwest axis through the Neath Valley. The upper sections of the valley are characterised by steep, wooded slopes that rise above 100 metres Above Ordnance Datum (AOD) on both the north and south sides. The town of Briton Ferry is centred around the A474 (Neath Road and Pantyrheol), a key district thoroughfare, while densely populated housing dominates the western side of this road. The Proposed Development is situated at an average elevation of approximately 7 metres AOD, however, the terrain within the Site varies significantly, with the south-eastern boundary of the Grandison Brook culvert reaching 42 metres AOD. More broadly, the topography of the area surrounding Briton Ferry displays considerable variation, with elevations generally declining towards the west.

The location plan and proposed Red Line boundary are illustrated in Figure 2-1. The application red line boundary is also shown in Drawing Nos NE05_001 ATK GEN SWMWREC DR CD 000001 Rev. P01 and NE05_001 ATK GEN SWMWREC DR CD 000002 Rev. P01



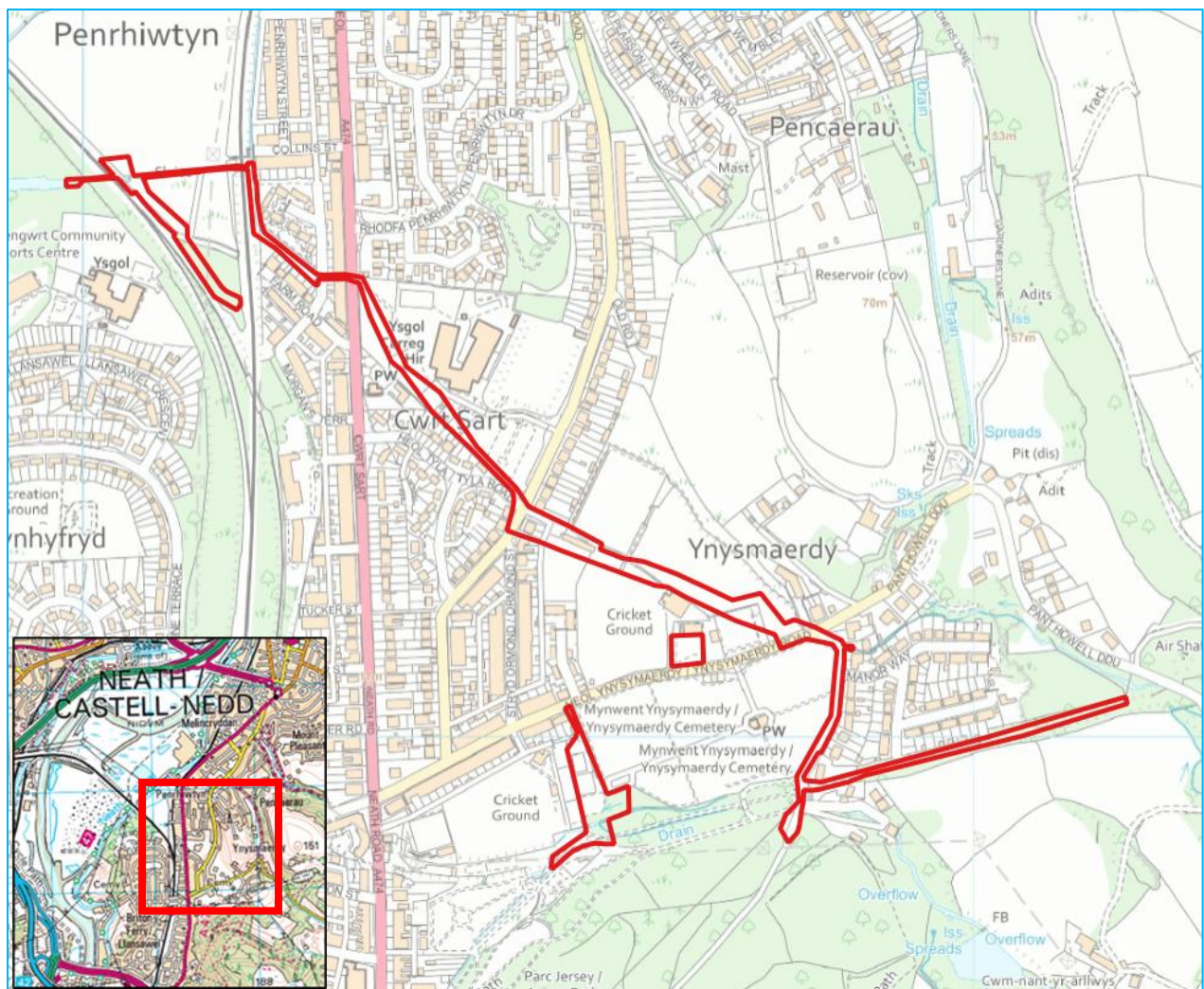


Figure 2-1 – Site Location plan and proposed Red Line boundary

2.2 Designations

The desk-based designations review was conducted to evaluate the environmental sensitivity and designations of the Site and its surroundings. The key findings are as follows:

National Landscapes

The proposed embankment and culvert work at Grandison Brook are not situated within a National Landscape.

Designated Nature Conservation Sites

- Two designated nature conservation sites lie within 2 km of the Site, namely: Earlswood Road Cutting Site of Special Scientific Interest (SSSI), and Crymlyn Burrows SSSI,

Local Environmental and Historical Features

Within a 1 km radius of the Site, there are four locally designated sites, including:

- Eaglesbush Valley Local Nature Reserve: Located about 1 km north-east of the Site, this reserve is recognised for its biodiversity and ecological importance.

- River Neath: Designated as a Site of Importance for Nature Conservation (SINC), located 1 km west of the Site.
- Ancient Semi-Natural Woodland: Found to the south of the Site (ID 18274).
- Restored Ancient Woodland: Located in proximity to Jersey Park to the south of the Site (ID 11351), adjacent to the ancient semi-natural woodland.

Sites of Importance for Nature Conservation (SINCs)

Within a 1 km radius of the Site, there are five Sites of Importance for Nature Conservation (SINCs), including:

- Neath Canal (984m)
- Giant's Grave (899m)
- Shelone Woods (926m)
- Garth Mor (370m)
- The Waun, Cimla (713m)

Scheduled Monuments

The Ynysmaerdy Railway Incline lies within the Site. The Carreg Hir Standing Stone (Pen-Rhiw-Tyn) is located approximately 160 metres north-east of the Site within the grounds of Ysgol Carreg Hir.

Historic Park and Garden

Part of the Site falls within Jersey Park, which is a Grade II registered historic park and garden.

Flood Risk

According to Natural Resources Wales (NRW) flood maps sources, areas within Briton Ferry are categorised as being at high risk of surface water flooding, with a likelihood of occurrence exceeding a 1 in 30 (3.3%) annual exceedance probability (AEP) event. The primary flooding source is the Grandison Brook catchment. A secondary contributor is the Ynysmaerdy Brook, which merges with Grandison Brook within the existing culvert system.



3. Interpretation

Through an analysis of the Site and its context as set out in Chapter 2, and applying the objective of the Proposed Development, a set of design principles have been established, which have informed the design process. The design principles are as follows:

- Provide flood mitigation for up to a 1 in 100-year event (1% Annual Exceedance Probability, AEP) to residential and commercial properties in the Pantyrheol area of Briton Ferry by improving the hydraulic capacity of the Grandison Brook culvert.
- Avoid or minimise direct physical impacts on, and detrimental impacts on the setting of, both the form and legibility of the Scheduled Monument and on the Jersey Park Historic Park and Garden.
- Ensure the arrangement and choice of materials for the alterations are sympathetic to both the appearance and setting of the Scheduled Monument and Jersey Park Historic Park and Garden.
- Avoid or minimise impact on potential buried remains associated with the former trackside building.
- Minimise the impact of construction and operation of the Proposed Development on recreation, including users of the Jersey Park Historic Park and Garden, Briton Ferry Woods, the sports pitches, the allotments and minimising the impact on local residents.

4. Project Background

4.1 Need for the Development

The Pantyrheol area in Briton Ferry frequently experiences flooding that affects both residential and commercial properties. These incidents occur due to the inadequate capacity of the existing Grandison Brook culvert. Floodwaters overflow at the inlet near Ynysmaerdy Road, flowing overland towards Pantyrheol, with additional surcharges occurring at various points along the culvert. At the A474 Pantyrheol Road, the surcharged culvert prevents effective drainage of surface water, resulting in water accumulation on the road and flooding of nearby properties.

Grandison Brook originates in the Ynysmaerdy district of Briton Ferry, fed by two open-channel tributaries, Upper Grandison Brook and Ynysmaerdy Brook. These tributaries enter separate culverts that converge near the junction of Ynysmaerdy Road and Pant Howell Ddu. From this point, Grandison Brook flows underground for approximately 1.5 km, passing beneath the A474 Pantyrheol Road, a secondary service road (near Brook Court/Llys-y-Nant Road), and the South Wales Main Line and Swansea District Line railways, before ultimately discharging into the River Neath west of the two railway corridors.

The existing drainage system lacks sufficient capacity to handle the surface water flows generated by certain storm events, leading to flooding in properties near Pantyrheol. The Proposed Development is critical to reducing the risk of flooding from Grandison Brook to these properties. Through extensive feasibility studies and hydraulic modelling, a solution has been identified to provide flood mitigation for up to a 1 in 100-year event (1% Annual Exceedance Probability, AEP). The Proposed Development will protect over 292 residential and commercial properties from the predicted flood extents associated with a 1% AEP event.



4.2 Design Evolution

Background

The Grandison Brook is a watercourse that was culverted at some point between 1918 and 1935 and has a low level of protection against flood events. The Proposed Development involves the installation of a new culvert to increase the drainage system's capacity. The new culvert will run parallel to the existing system, following a route beneath the highway, through playing fields, and under allotments. This culvert will be buried underground, ensuring minimal disruption to the surface environment. The increased capacity of the upgraded system will allow floodwaters to flow more effectively from Grandison Brook into the River Neath, mitigating the flood risk for properties in Briton Ferry.

AtkinsRéalis was appointed in September 2019 to undertake the detailed design of the Proposed Development, including comprehensive hydraulic modelling. Updated hydrological assumptions, based on Natural Resources Wales (NRW) guidance, revealed limitations in earlier proposals. Despite improvements in some areas, the initial designs were found to cause increased flooding risks to downstream properties. Design adjustments were made to avoid these impacts, resulting in an expanded scope for the project. The revised Proposed Development includes a longer culvert system that outflows into a watercourse connecting to the River Neath, ensuring a more robust and effective flood mitigation solution as a result of the updated hydrological assumptions undertaken.

Design considerations and amendments

Towards the end of 2022, revisions were made to the design of the Proposed Development as set out in the following paragraphs.

An amendment to the line of the proposed culvert was made to avoid Llansawel AFC grounds in favour of a route through some allotments. This decision to amend the alignment was made because of the impacts to the football club, which plays in the Cymru Premier League, the national football league of Wales. The previously proposed pipe route through the pitch had the potential to require league games to be relocated and the need for quality reinstatement to the pitch to meet league requirements. The impact of the route through the allotments was considered less disruptive and the reinstatement requirements less onerous.

The flood bund proposed along the eastern edge of Jersey Park was removed from the Proposed Development to allow floodwater to enter Jersey Park towards the proposed flood attenuation system.

The proposed attenuation pond on a strip of tarmac and grass between the cricket pitch and Jersey Park on the Scheduled Monument was discounted in favour of a buried tank under the children's play area and 5-a-side tarmac football pitch to the northeast. This followed an initial consultation with Cadw, which highlighted that the area of the previously proposed pond was in an area protected as a Scheduled Monument (the historic Ynysmaerdy Railway Incline).

The addition of stone/gravel to existing access routes alongside Network Rail land is proposed to improve access to the construction area.

As part of an EIA screening exercise undertaken in August 2024, concerns were raised by Cadw about the potential for the Proposed Development to have significant direct and indirect effects on the Ynysmaerdy Incline Scheduled Monument and the Jersey Park Historic Park and Garden. Therefore, on 22 October 24 a meeting was held on Site and further design changes were made including consideration of further mitigation measures as set out below.

In Jersey Park, for the planned stormwater attenuation system, the introduction of a bank across the Scheduled Monument was discounted in favour of a ditch near to the play park, with a footbridge provided to carry the footpath over the ditch. This design change was made to maintain a continuous gradient of the Incline to minimise impact on the form and legibility of the Railway Incline, a key aspect of the historic asset's significance.



Further mitigations for the impact on the setting of Jersey Park Historic Park and Garden are now proposed including selecting a steel footbridge which aesthetically reflects past industrial heritage and the removal of some modern street furniture (fencing) and its replacement with fencing which matches that used around the main park perimeter. The design of these features will accord with the architectural aesthetic guidelines being developed for the emerging Masterplan for Jersey Park which is being prepared for Friends of Jersey Park.

The use of buried pipework to connect the ditch with the attenuation system and to connect the outlet from the attenuation system to an existing watercourse was introduced to reduce the visual impact on the legibility of the Scheduled Monument.

The potential for the Proposed Development to impact on the potential buried remains of a trackside building to the east of the proposed flow interception ditch was identified. The design has been revised to avoid impacting on this structure as far as possible by increasing the separation distance to the proposed ditch excavation. Additionally, mitigation in the form of archaeological investigation will take place in advance of the construction works to identify any buried features and allow mitigation to reduce direct impact through full excavation recording.

The potential for the introduction of onsite interpretation about the Incline was considered although it was recognised that this would require periodic replacement. Interpretation signage is being considered as part of the Masterplan being developed by NPT, which is beyond the scope of this planning application. The potential for community engagement was also noted through 'Friends of Jersey Park' and local historical societies. The Applicant has consulted the team preparing the Masterplan for Jersey Park to ensure the flood alleviation scheme is taken into account in the emerging Masterplan.

There are a number of small trees which would require removal. Where appropriate, their loss would be mitigated by replacement of 3 trees of a similar type and compensatory size for every 1 lost. These will be onsite, or immediately adjacent to the Site.

Further mitigations to the part of the Incline above Ynysmaerdy Road on the walking route known as Rhodfa Clarke (Incline) are proposed including reinstating the appearance of Incline which has become very narrow at pinch points due to lack of maintenance of vegetation. The works would allow potential for strimming to widen the path along the Incline outside Jersey Park to widen the pathway and reduce potential for rutting which is occurring particularly at pinch points. These improvements would mitigate and minimise direct physical impacts on and/or impact on the setting of the Incline from floodwater which will be routed along it.

The Proposed Development follows Cadw's recommendation to use biodegradable reinforced coir matting in place of geotextile where the bank of the Incline is to be raised, thus enabling suitable grass to grow through the matting. Stone cladding is now proposed to a small drainage headwall at the location of the Incline with Ynysmaerdy Road to reduce the visual impact of the Proposed Development within the extent of the Scheduled Monument.

A ditch and headwall proposed at the junction of the Incline and Ynysmaerdy Road has been relocated further to the east to avoid being located on private land. An additional bund will be constructed to offer protection to the four properties south of the Incline (Ger y Nant, Parkways, Incline Cottage and Mill Stream) which are located towards the upper end of Ynysmaerdy Road.

Following consultation, the local highway authority commented that the proposed use of a drainage grating within the public highway along with a road hump of 300mm high was not considered suitable. An alternative design has been developed which involves earthworks to the west of Ynysmaerdy Road to the rear of the rugby sports pitch to create a ditch to collect flood water. Regrading of the road and a hump not exceeding 100mm high across the road and over the footway are proposed to ensure flood water is routed to the ditch rather than in a south-west direction along Ynysmaerdy Road.



5. Proposed Development

5.1 Proposal

The Proposed Development involves a series of works aimed at reducing flooding risks in Briton Ferry, specifically to properties along the Grandison Brook. The Proposed Development includes the following key elements:

Culvert and Inlet Structure Installations

A new culvert will be installed along the highway and through green/open spaces, replacing some sections of the existing open channel. The new culvert will rejoin the existing watercourse downstream before discharging into the River Neath. This overarching arrangement is supported by a number of localised and associated works, as set out below:

- Localised raising of the existing banks along Rhodfa Clarke Walk by 0.5m to help control flood waters.
- Excavation and replacement of existing culverts, along Ynysymaerdy Road. A new 1200mm diameter culvert will be installed in an open trench across the playing fields and through allotments behind Llansawel AFC grounds to Old Road, whilst the existing culvert in these areas will be cleaned and relined to increase longevity of the existing culvert system.
- Refurbishment of the existing inlet structure at Ynysymaerdy Road, replacing the galvanised steel trash and security screen with a new screen. The inlet structure will have a galvanised steel guardrail on top, an access ladder with a handhold to allow operatives to access and maintain the structure and will be secured by a 1.1m high galvanised access gate with mesh infill panels. The culvert at Pantyrheol Road will change size from a 1200mm diameter pipe culvert to twin culverts (1250 x 750mm). It will be installed across the road and through a gap between houses, continuing towards the railway corridor.
- A new 1750 x 1000 box culvert will be constructed east of the mainline railway, connecting to the existing brick arch culvert near Collins Street, with the land raised slightly along the route of the culvert. Gabion baskets will be used to support the earthworks.
- A concrete chamber will be constructed where the new box culvert connects to the existing brick arch culvert and will be around 2m above the existing ground. The culvert will outfall to the existing ditch and flow towards the District Line (freight) railway line further to the west.

Jersey Park

- A buried surface-water storage tank will be constructed beneath the play area, which will include a new inlet structure, pipe inlet, and a new section of watercourse with a pedestrian footbridge.
- The proposed replacement of the parapet and handrail of the existing footbridge at Jersey Park will be designed to reflect the early 20th-century architectural style prevalent throughout the park and to accord with architectural aesthetic guidelines within the emerging Jersey Park Masterplan.

Penrhiwtin Flood Defence

A proposed earthwork flood defence bund, with a crest level at 6.5m AOD, will be built to protect the railway line from increased flood levels during extreme storms. A small section of concrete retaining wall will be incorporated in part of the flood defence and will be constructed above an existing culvert headwall.



Landscaping and Reinstatement

Disturbed areas along the construction route will be reinstated, particularly where the culverts cross highways and playing fields.

Some trees will be removed in the school grounds, near the perimeter of the cricket pitch and along a small section of the Incline. At Ynysmaerdy Road the proposed ditch also requires the removal of seven Sycamore trees because their root systems pose a risk of interfering with and potentially damaging the new pipes being installed. Nine low-or-poor quality trees and one moderate quality tree (Lime) in the Jersey Park playground are to be removed to allow the installation of the buried storm-attenuation system. The dimensions of the attenuation tank are a function of the flood modelling which has been undertaken while the siting of the tank has been heavily influenced by existing physical constraints such as a wall, a building and fencing. Due to the sizing requirement of the tank and the physical constraints, removal of one moderate quality tree is unavoidable. A total of 23 trees are proposed for removal to accommodate the Proposed Development.

A compensatory tree planting scheme will ensure the Proposed Development complies with NPTC's tree replacement policy. Tree replanting in the vicinity of the drainage scheme is constrained by the need to avoid roots from interfering with the drainage scheme and to avoid impeding the flow of flood water. In addition, no tree planting is proposed in the Ynysmaerdy Incline Scheduled Monument. At the proposed ditch on Ynysmaerdy Road, two replacement trees would be planted in specially designed tree pits that incorporate features, such as root barriers or deflectors, to actively restrict horizontal and near-surface root spread. Furthermore, any species selected for replanting will be chosen specially, not to rely on a wide root spread and known to have a compact or deeper growing root system. At Jersey Park a tree protection scheme will be incorporated within the works to protect trees in close proximity to excavated areas.

For the reasons identified above the majority of new tree planting will be off-site on land owned and managed by NPTC. As part of the emerging landscape masterplan for the Jersey Park Registered Park and Garden, which is being developed on behalf of the Friends of Jersey Park, suitable locations have been identified for compensatory planting within the Park. In order to replace trees on 3 to 1 basis, as required by the tree replacement policy, some tree planting would take place in other parks/spaces elsewhere in the County. Therefore 69 trees are to be planted to compensate for the trees to be felled as part of the Proposed Development. A detailed tree mitigation planting scheme identifying the locations, species, spacings and height of the tree planting will be prepared and agreed with stakeholders at the detailed design phase.

The proposed Ynysmaerdy Road ditch will require the removal of the existing concrete fencing. A new timber fence will be erected behind the ditch, and a pedestrian guardrail will be installed along the footpath for safety reasons.

5.2 Construction

Construction activities will be limited to daytime hours (e.g. 7:30 am to 6:00 pm Monday to Friday and 8:00 am to 1:00 pm on Saturdays). Whilst no night-time working is planned, it may be required for specific sites on weekday nights only. Occasional weekend working may be required to minimise the duration of the construction phase or to deliver large construction items outside peak traffic hours. There will be no work over Christmas, New Year, Easter, public holiday and Bank Holidays.

Temporary site compounds will be required for storing plant, machinery, and welfare facilities. The primary compound location is proposed at the Briton Ferry Woods Car Park on Ynysmaerdy Road. Other potential locations for site compounds include the car park at Ysgol Carreg Hir School or the car park at the Briton



Ferry RFC rugby club (See Figure 5-1). The temporary compounds will be established using permitted development rights.

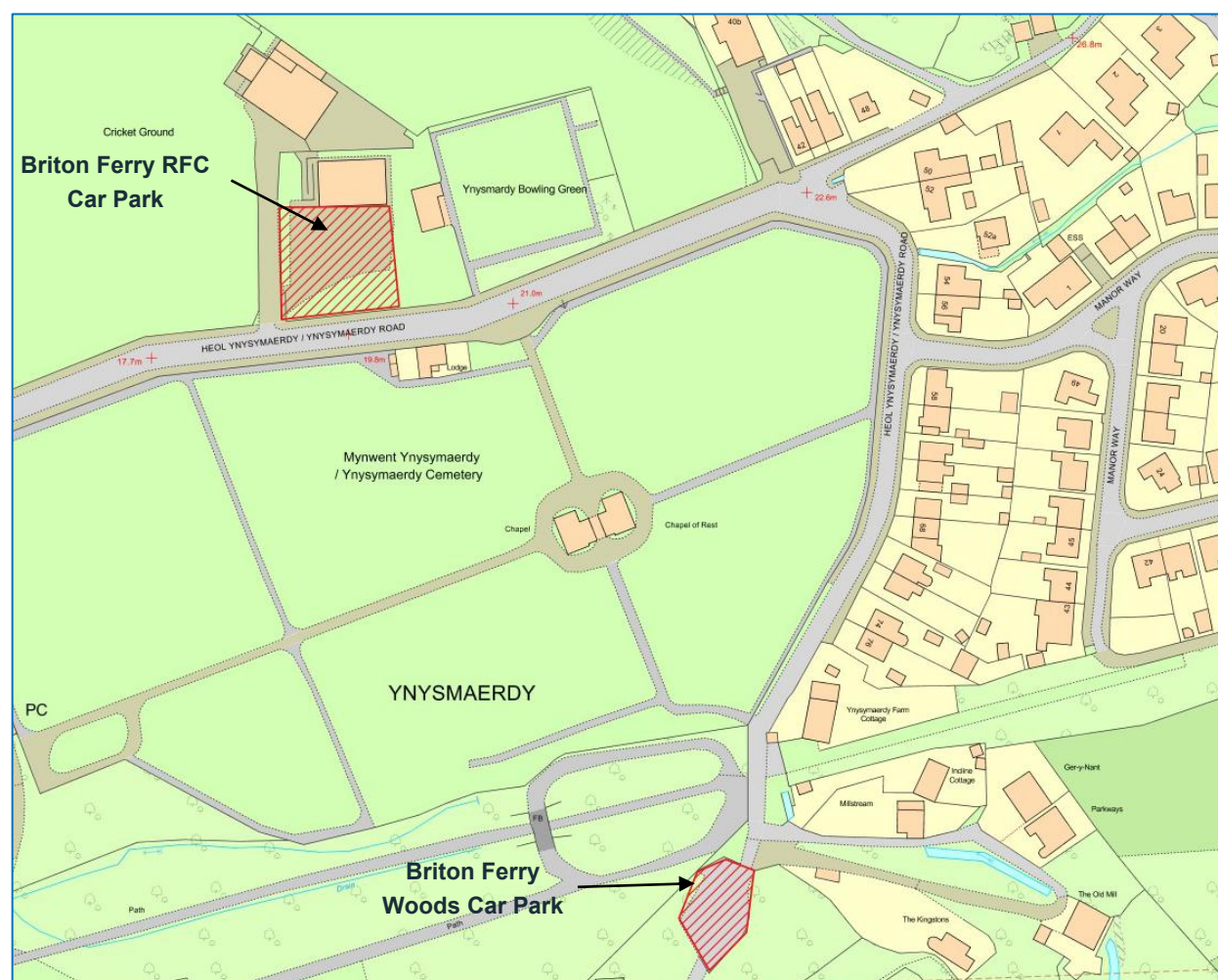


Figure 5-1 - Proposed Location of a Construction Compound

Plans of the main construction routes and off-road site access routes are provided in the Construction Traffic Management Plan (CTMP) (ref: NE05_001-ATK-ECA-SWMWREC-RP-LP-002).

The construction works are anticipated to last 12 months and will be carried out in phases to minimise disruption, particularly during the peak seasons for recreational facilities.

In advance of work starting, occupiers of adjacent properties and the public generally will be informed of the works, their planned duration, roads and access closures, and alternative access routes. The information will be conveyed in writing and by locally posted public notices.

Jersey Park playground and its access point from the western boundary with Ynysmaerdy Road will be temporarily closed during the construction of the below-ground surface water storage tank. The temporary loss of the playground would impact on users of the facility. The nearest alternative playground is approximately 1km away. The play equipment at the playground will be renewed on completion of the works.

To undertake the works to replace the culvert under the cricket and rugby pitches and under the allotments, the temporary closure of those facilities would be necessary. Some work is also required at the location of an existing buried manhole within the bowling green, which will involve taking the existing manhole out of service

by installing a continuous liner through the chamber to prevent future use. This particular aspect of work will be undertaken entirely underground without the need to excavate any ground on the bowling green.

The culvert installation works would be carefully programmed to minimise the impact on the use of those facilities. Following installation of the replacement culvert the affected ground would be re-instated to its pre-works condition.

Dust will be generated during construction. In order to minimise dust generation good construction practice measures will be adopted including use of water bowsers to dampen material stockpiles and restricting the speed of construction site vehicles.

5.3 Character

Scale

The Proposed Development exceeds one hectare, stretching from the Rhodfa Clarke (Incline) footpath in the east to a rail freight line in the west, to reduce flood risk to over 292 properties in the Pantyrheol area of Briton Ferry. The dimensions of the proposed culverts, flood defence bund and buried surface water storage tank are a function of the additional hydraulic capacity required with the Grandison Brook to provide flood protection.

Heritage

The Ynysmaerdy Incline Scheduled Monument and the Jersey Park Historic Park and Garden are nationally important designations. Therefore, minimising the impact of the Proposed Development on these designations has been an important consideration in the evolution of the design proposals.

A proposal for an attenuation pond was discounted with a buried tank proposed instead to minimise impacts on the Scheduled Monument. A proposal to introduce a bank across the Scheduled Monument was discounted with a ditch near to the play park proposed, with a footbridge provided to carry the footpath over the ditch. This design change was made to maintain a continuous gradient of the Incline to minimise impact on the form and legibility of the Railway Incline. Stone cladding is proposed to a small drainage headwall at the location of the Incline with Ynysmaerdy Road to reduce the visual impact of the Proposed Development within the extent of the Scheduled Monument.

Further mitigations for the potential impact on the setting of Jersey Park Historic Park and Garden include selecting a steel footbridge which aesthetically reflects past industrial heritage and removal of some modern street furniture (fencing) and its replacement with fencing which matches that used around the main park perimeter. The use of buried pipework to connect the ditch with the attenuation system and to outlet the attenuation system into an existing watercourse reduces the visual impact on the legibility of the Scheduled Monument.

The design has been revised to avoid impacting on the potential buried remains of a former trackside building as far as possible by increasing the separation distance to the proposed ditch excavation.

Spaces and Public Realm

The Proposed Development has been designed to ensure that the majority of it will be buried underground. The intake structures are the only significant above ground element and a new bespoke manhole near Brook Court. This will minimise the visual impact of the Proposed Development and will avoid post-construction adverse effects on users of Jersey Park.

In Jersey Park, some of the fencing and the footbridge over the watercourse are to be replaced using materials and finishes which are more in keeping with the existing local vernacular.

Any vegetation lost as a result of the Proposed Development will be reinstated. The loss of several small trees will be mitigated by 3 trees for every 1 that is lost, of a similar type and compensatory size.



5.4 Access

For the construction phase, access to the Proposed Development will be via a combination of existing public highways and temporary site access tracks. The Site is effectively split into two sections because the mainline railway and the fenced off area of Network Rail land within Penrhiwtin is not routinely accessible to the public. This section to the west can only be accessed via a level crossing off the A474 opposite Morgans Road. The eastern section of the Site is accessible via the A474 and Ynysmaerdy Road up to the point where entrance points will be created to access off-road sections. The temporary off-road access tracks will run alongside existing sections of open channel, along the line of the proposed culvert and within Jersey Park.

A CTMP (ref: NE05_001-ATK-ECA-SWMWREC-RP-LP-002) has been prepared to support the planning application. The CTMP proposes a range of mitigation measures to be employed during the construction phase, including programming and phasing of construction, road/lane closures and public rights of way closures/diversions, to avoid or minimise conflict with pedestrian and vehicular access to the adjacent land uses.

Two public rights of way will be affected during construction of the Proposed Development. These are Footpath 30/MO.ANB18/1 which runs along The Incline and Footpath 37/MO.ANY1/1 which runs along the northern edge of the rugby pitch and along the access to Llansawel AFC. It is likely that these footpaths would need to be temporarily diverted. The diversions would require temporary diversion orders. Construction will be programmed to minimise the duration of temporary footpath closures/diversions and ensure safe access for footpath users.

Once construction is complete, users should see improvements to the local public right of way network at this location due to decreased flood risk and also from effectively increasing the width of the Incline following the strimming of vegetation..

Once the Proposed Development is operational, access will only be required for maintenance visits. Access for maintenance would be obtained via the existing public highway network and through agreement with landowners/occupiers such as Network Rail as required.

5.5 Environmental Sustainability

The construction stage of the Proposed Development will involve the consumption of natural resources and the generation of greenhouse gas (GHG) emissions during the production of construction materials, their transport to the Site, and construction activities. NPTC procurement policies, including duties under the Well-being of Future Generations (Wales) Act, require consideration of sustainability and climate change. Where possible, local and sustainable material choices will be considered, and transport options will consider climate impacts.

A Site Waste Management Plan will also be developed prior to construction, setting out how waste will be managed during the construction process in order to minimise waste and reuse it or recycle it where possible.

Operation of the Proposed Development will be passive and will not require any power. Post construction, there will be no need for any repair or maintenance works for several years, and any are likely to be small-scale in nature and are not anticipated to result in significant generation of GHG or other emissions. There are no scheduled maintenance works, but inspection and monitoring will be carried out and reactive maintenance carried out only if necessary, which is expected to be small scale and infrequent. Barring such maintenance, the operation of the Proposed Development does not require any intervention once construction has finished.

The purpose of the Proposed Development is to deliver climate change adaptation and improve resilience by reducing the risk of flooding in Briton Ferry. The design of the Proposed Development takes into account the most up-to-date predictions of future climate change and flood risk. This means that the Proposed Development is designed to withstand a 1 in 100-year event (1% Annual Exceedance Probability, AEP).



Ecological enhancements, planting and other mitigation measures are proposed to enhance biodiversity and to help offset carbon emissions as set out below:

- At the Incline, ecological enhancements will include bat boxes on retained trees and 2 bird boxes for tit species.
- Retained amenity grassland habitats will be enhanced through a reduction in management frequency and implementation of more ecologically sensitive management techniques, such as infrequent cutting regimes, using low ground pressure machines and removal of arisings.
- Cutting regimes will be designed to leave a taller sward and timed to encourage natural wildflower establishment, allowing the setting of seed.
- Where possible, turf will be removed to create bare areas which are permitted to naturally recolonise from the local seed bank, with only light grass seeding where necessary to accelerate cover.

Before construction commences a Construction Environmental Management Plan (CEMP) will be prepared to minimise adverse environmental effects during construction of the Proposed Development. The CEMP will cover the following topics:

- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats mitigation measures.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- Control of Nuisances: restrictions in construction including timing, duration and frequency of works; measures to minimise noise and vibration; dust control measures; measures to control light spill.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use, details of construction materials.
- Water Quality: measures to minimise the risk of water pollution.

5.6 Community Safety

A principal aim of the Proposed Development is to enhance the standard of flood protection in Briton Ferry, and in so doing, it will improve community safety.

5.7 Consultation

5.7.1 Pre-Application Advice

In December 2020, a request for pre-application planning advice on a flood alleviation scheme for the Grandison Brook was submitted to Neath Port Talbot Council (Pre-app ref. Q2021/0001). As part of that request, clarity was sought on whether some, or all, of the Proposed Development could be considered permitted development (i.e. not requiring a planning application). Schedule 2, Part 14, Class A of the Town and Country Planning (General Permitted Development) Order 1995 states that permitted development includes: *“development by a drainage body in, on or under any watercourse or land drainage works and required in connection with the improvement, maintenance or repair of that watercourse or those works.”* NPTC is a drainage body, by virtue of being a Lead Local Flood Authority (LLFA) and is seeking to carry out land drainage works in connection with the improvement of existing below-ground pipework. An informal response from NPTC planning team indicated that part of the works could be permitted development.



Following a revision to the design of the Proposed Development, the permitted development analysis was revisited in November 2022. Whilst some elements of the Proposed Development as currently designed could, on their own, be considered permitted development, those elements are interspersed with sections that are potentially not permitted development due to the offline nature of the works relative to the existing drainage system. The conclusion was reached that an application for planning permission covering the whole Proposed Development would be more coherent and easier to be understood by stakeholders.

5.7.2 Stakeholder Consultation

NPTC, as the local planning authority, adopted an EIA screening opinion on 13th September 2024, confirming that the Proposed Development did not constitute EIA development (LPA ref P2024/0533). The screening opinion included feedback from highways and drainage officers at NPTC on what would be expected to be included in a planning application for the Proposed Development.

Given the sensitivity of the densely populated area in which the Site is located, the highways officer requested a CTMP to be prepared for each phase/location of construction. Inter alia, the CTMP is required to contain information on the following: consolidation/timing of deliveries, traffic routes/volumes/frequency, road/lane closures, public rights of way diversions and a site operative travel plan.

Various drainage requirements of the Proposed Development were set out by the drainage officer, including the potential need for SuDS Approval Body (SAB) approval prior to commencement of works on site.

Consultation was undertaken with the NPTC Ecologist between July and August 2021 to consider the potential loss of or effects to trees and vegetation due to the Proposed Development. The first site walkover was conducted with the Ecologist on 5th August 2021.

Following the adoption of the Environmental Impact Assessment (EIA) Screening Opinion on 13th September 2024, the LPA received a late consultation response from Cadw, the Welsh Government's Historic Environment Service. Cadw expressed concerns that *the EIA Screening Opinion request did not provide sufficient information regarding mitigation measures for potential impacts on the Scheduled Ancient Monument and the Historic Park and Garden within the vicinity of the proposed development.*

Considering these concerns, the NPTC's heritage officer organised an on-site meeting with Cadw to discuss the identified issues. Following a site meeting on 22 October 2024 with AtkinsRéalis staff, NPTC officers, and Cadw, key heritage considerations for the Proposed Development at Jersey Park and the Scheduled Monument of Ynysmaerdy Incline (GM489) were addressed. The limited physical impact of the Proposed Development on the Scheduled Monument was discussed, and it was agreed that Scheduled Monument Consent (SMC), with mitigation measures focusing on conserving the appearance of the Incline, using sensitive designs (e.g. a flow interception ditch with a footbridge), and employing sympathetic materials to minimise visual impact would be required.

Addressing vegetation degradation, widening paths to prevent rutting, and improving local structures like the play area footbridge were also discussed at the site meeting. Minimal visual impact is expected in Jersey Park, with its character preserved through sensitive vegetation reinstatement. The requirement for further archaeological evaluations was also discussed.

Subsequently, as a result of the Cadw consultation response, which was received after the first EIA Screening Opinion was adopted, a revised EIA Screening Opinion request was submitted in December 2024. This incorporated more detailed information regarding heritage mitigation. This revised submission directly addressed Cadw's concerns, ensuring that appropriate measures are proposed to safeguard the integrity of the Scheduled Ancient Monument and the Historic Park and Garden. This process and approach demonstrated the commitment of the LPA to addressing heritage-related concerns and ensuring compliance with statutory and advisory requirements.



The amendments to the Proposed Development, as discussed at the site meeting, including a more sensitive design and the introduction of more mitigation and enhancement measures, will reduce the impact of the Proposed Development on designated heritage assets.

After the adoption of a negative EIA screening opinion on 13th September 2024, and following the receipt of comments from Cadw, and the submission of a revised EIA screening report, the LPA adopted a second EIA screening opinion on 27th January 2025 (LPA ref. P2024/0811) confirming that the Proposed Development does not constitute EIA development.

6. Planning Legislation and Policy

This chapter reviews the planning policy framework against which the Proposed Development will be judged. It includes relevant planning acts, policy and guidance at the national level, as well as adopted policies in the local development plan.

6.1 Legislation

6.1.1 Planning (Wales) Act 2015

The Planning (Wales) Act 2015 amended the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004, introducing several reforms to enhance the planning system in Wales. A key change was the establishment of a National Development Framework, replacing the Wales Spatial Plan, and the creation of Strategic Planning Panels to prepare Strategic Development Plans. The Act also implemented improvements to development management and enforcement processes.

In 2021, the Welsh Government initiated a consolidation programme to simplify and modernise planning law. This effort aims to bring together provisions from various Acts, including the Town and Country Planning Act 1990 and the Planning (Wales) Act 2015, into a single, accessible framework tailored to Wales' specific needs. The consolidation is intended to create a more efficient and effective planning system by updating and harmonising existing laws.

As of April 2025, the Planning (Wales) Act 2015 remains in effect, with ongoing efforts to consolidate and modernise planning legislation in Wales.

6.1.2 Well-being of Future Generations (Wales) Act 2015

The Planning (Wales) Act 2015 requires that legislation be a material consideration in the determination of planning applications in Wales. The Act places a duty on Welsh Ministers, along with other public bodies, to produce well-being objectives that align with the national well-being goals. They must also take reasonable steps to meet these objectives within the context of sustainable development principles. The Welsh Well-being Goals are:

- **Prosperous Wales**, an innovative, productive, and low-carbon society that recognises the limits of the global environment, uses resources efficiently, and develops a skilled, well-educated population. It fosters an economy that generates wealth and provides employment opportunities, ensuring decent work and equitable access to wealth.
- **Resilient Wales**, a nation that maintains and enhances a biodiverse natural environment with healthy, functioning ecosystems that support social, economic, and ecological resilience, capable of adapting to changes, such as climate change.

- **Healthier Wales**, a society that maximises people's physical and mental well-being, where choices and behaviours that benefit future health are understood and supported.
- **More equal Wales**, society that enables people to fulfil their potential, regardless of their background, including socio-economic circumstances.
- **Wales of cohesive communities**, attractive, viable, safe, and well-connected communities.
- **Wales of vibrant culture and thriving Welsh language**, society that promotes and protects culture, heritage, and the Welsh language, encouraging active participation in arts, sports, and recreation.
- **Globally responsible Wales**, nation that, in its efforts to improve the economic, social, environmental, and cultural well-being of Wales, considers the positive contribution that such efforts may make to global well-being.

To ensure appropriate consideration of the well-being goals and sustainable development in the decision-making process, public bodies are required to have regard to the 'five ways of working' under the Well-being Act. These are:

- Involvement: Involving people with an interest in achieving the well-being goals and ensuring that their diversity reflects the area being served.
- Collaboration: Collaborating with any other individuals or parts of the body itself that can help meet the well-being objectives.
- Integration: Considering how the public body's well-being objectives may impact the well-being goals, their own objectives, or those of other public bodies.
- Prevention: Taking action to prevent problems from occurring or worsening to help public bodies meet their objectives.
- Long-term: Balancing short-term needs with long-term requirements to safeguard future ability to meet these needs.

6.2 National Planning Policy

6.2.1 Future Wales – The National Plan 2040

Published in February 2021, Future Wales –The National Plan 2040 serves as the national development framework for Wales, guiding development until 2040. It addresses key national priorities, including fostering a vibrant economy, achieving decarbonisation and climate resilience, developing strong ecosystems, and improving the health and well-being of communities.

Chapter 4 - Strategic and Spatial Choices: Future Wales' Spatial Strategy

The policies outlined in **Future Wales** are material considerations for planning applications. Relevant policies for the Proposed Development include:

Policy 8 – Flooding

This policy prioritises flood risk management to support sustainable growth in National and Regional Growth Areas, focusing on developments in areas with no flood risk. The Welsh Government will collaborate with Flood Risk Management Authorities and developers to plan new infrastructure, promoting nature-based



solutions for improved protection of developed land. Infrastructure investments should maximise social, economic, and environmental benefits, without harming designated nature conservation sites.

Policy 9 – Resilient Ecological Networks and Green Infrastructure

This policy highlights the importance of enhancing biodiversity, ecosystem resilience, and green infrastructure, alongside urban growth. The Welsh Government will work with partners to:

- Safeguard key areas for ecological networks in Strategic and Local Development Plans (LDPs), protecting habitats, species, and ecosystem services.
- Identify opportunities to maximise green infrastructure and nature-based solutions in placemaking to secure sustainable growth, ecological connectivity, and social well-being.
- Natural Resources Wales provides indicative maps for natural resource themes, which should be used as a starting point for considering ecological networks and green infrastructure. Area Statements will identify priority areas for action, which should be safeguarded and connected through development plans.

Chapter 5 - The Regions

This chapter underscores the growing role of regional planning in Wales, forming part of the Welsh Government's vision for a three-tiered planning system. The four regions in Wales have distinct opportunities and challenges, and regional collaboration is key to achieving better outcomes and a fairer distribution of wealth and opportunity. Glynneath is located within the Southwest Wales Region, which includes Carmarthenshire, Neath Port Talbot, Pembrokeshire, Swansea, and Pembrokeshire Coast National Park.

Policy 28 – National Growth Area – Swansea Bay and Llanelli

Welsh Government supports sustainable growth in Swansea Bay and Llanelli, designating these areas as the focus for growth and investment in the Southwest region. Collaboration between regional bodies and local authorities will promote Swansea Bay and Llanelli's strategic role, ensuring that key investment decisions support these areas and the wider region. Strategic decisions on the location of services and infrastructure should be made regionally, prioritising accessibility, sustainability, and addressing inequality and deprivation. They should also strengthen links with neighbouring regions.

6.2.2 Planning Policy Wales: Edition 12

Planning Policy Wales (Edition 12) was published in 2021 and updated in July 2024, superseding Edition 11. It reflects changes to the legislative and policy framework for planning in Wales, placing a strong emphasis on sustainability, climate change, and resilience. This edition brings several key reforms to how planning decisions are made, ensuring that they align with national priorities and provide clear guidelines for local authorities, developers, and stakeholders involved in the planning process.

Chapter 2: People and Places: Achieving Well-being Through Placemaking

The chapter focuses on Placemaking as a cornerstone for achieving well-being in Wales. Placemaking involves creating inclusive, sustainable, and resilient spaces that enhance quality of life and align with the Well-being of Future Generations (Wales) Act 2015. The chapter mentions the need to integrate well-being goals into planning and highlights the principle of sustainable development, which requires balancing social, environmental, and economic considerations.



Chapter 3: Strategic and Spatial Choices

This chapter addresses the importance of strategic and spatial planning in managing land use and development across Wales. It advocates for a coherent spatial strategy that aligns local, regional, and national priorities while respecting environmental limits. The growing role of regional planning is highlighted, with partnerships addressing housing, infrastructure, and employment needs.

The distribution of development thoughtfully, ensuring long-term sustainability for both urban and rural regions. Infrastructure planning must integrate a focus on supporting transport, utilities, and essential services.

Chapter 5: Productive and Enterprising Places

This chapter highlights the role of sustainable development as the foundation for planning in Wales, aligning with the Well-being of Future Generations (Wales) Act 2015. The Act places sustainable development at the core of decision-making. The key policy considerations include:

- National Development Framework (NDF): The NDF is a component providing a long-term spatial strategy to guide development. It aligns with sustainable development principles and directs growth in ways that promote economic, social, environmental, and cultural well-being.
- Technical Advice Notes (TANs): PPW Edition 12 reaffirms the importance of TANs, offering specific guidance on planning topics such as:
 - TAN 5: Nature Conservation and Planning, focusing on biodiversity protection.
 - TAN 12: Design, outlining principles for sustainable and high-quality design.
 - TAN 15: Development, flooding and coastal erosion.
- Climate Change and Resilience: This emphasises the need to address climate change through mitigation and adaptation measures. All planning decisions should contribute to achieving net-zero emissions, incorporating green infrastructure and nature-based solutions. Resilient ecosystems and biodiversity are critical for creating environments that can adapt to changing climate conditions.
- Flood Risk Management: Developments should be concentrated in areas with low flood risk, while sustainable drainage systems and nature-based solutions are encouraged to mitigate risks. Flood management projects should also ensure environmental and social benefits while safeguarding natural habitats.

Chapter 6: Distinctive and Natural Places

The chapter centres on protecting and enhancing Wales' natural environment, biodiversity, and cultural heritage. It stresses the importance of biodiversity and ecosystem resilience, requiring planners to respect natural ecosystems and adopt nature-based solutions.

The protection of landscapes and cultural heritage is prioritised, ensuring that developments respect areas of natural beauty and historic significance. Planning should safeguard high-value environmental areas, such as Sites of Special Scientific Interest (SSSI), while promoting green infrastructure to support both urban and rural development.

Climate resilience is a key focus, with policies encouraging flood risk management and sustainable drainage systems to adapt to climate change. Environmental Impact Assessments (EIAs) are mandatory for developments affecting natural resources or biodiversity, particularly in sensitive areas such as National Parks or Areas of Outstanding Natural Beauty (AONB).



6.2.3 Technical Advice Notes

The Welsh Government has produced a series of Technical Advice Notes (TANs) that complement the Planning Policy Wales (PPW). The following relevant TANs have been considered for the Proposed Development:

- TAN 5: Nature Conservation and Planning (2009): Provides guidance on how the land use planning system can contribute to the protection and enhancement of biodiversity and geological conservation.
- TAN 11: Noise (1997): Advises on how the planning system can mitigate the adverse effects of noise without imposing unreasonable restrictions on development or excessive costs and administrative burdens. It highlights key considerations for local planning authorities in preparing development plan policies and determining planning applications for noise-generating developments or those exposed to existing noise sources.
- TAN 12: Design (2016): Offers guidance on promoting sustainability through good design and planning for sustainable buildings, aiming to support those involved in the design process to meet these objectives.
- TAN 15: Development, flooding and coastal erosion (2025): Provides technical guidance to supplement Planning Policy Wales on development and flooding. It outlines a framework for assessing risks associated with both river and coastal flooding, as well as additional runoff from development in any location.
- TAN 24: The Historic Environment (2017): Provides guidance on how the planning system should account for the historic environment during the preparation of development plans and the decision-making process for planning, listed building consent (LBC) and scheduled monument consent applications. This includes the consideration of archaeological remains, listed buildings, conservation areas, and historic assets of special local interest relevant to the Proposed Development.



6.3 Local Policy

6.3.1 Neath Port Talbot Local Development Plan

The **Neath Port Talbot Local Development Plan (LDP)**, adopted in January 2016, outlines strategic planning and development management policies. Below are the relevant policies that apply to the Proposed Development:

Strategic Policy SP1 – Climate Change

This policy addresses climate change by promoting efficient and sustainable settlement patterns, considering flood risks, and enhancing resilience. It also seeks to minimise habitat fragmentation and support habitat migration where possible.

Strategic Policy SP3 – Sustainable Communities

This policy focuses on creating sustainable, healthy, and cohesive communities while conserving the countryside.

Policy SC1 – Settlement Limits

Development within settlement limits must be proportionate to the settlement's role and function. Development outside these limits is allowed only for public utilities, infrastructure, or waste management that cannot be located elsewhere.

Strategic Policy SP4 – Infrastructure

The policy encourages efficient use of existing infrastructure and provision for new infrastructure, ensuring no detrimental effects on the area and community.

Strategic Policy SP14 – The Countryside and Undeveloped Coast

The policy aims to protect the open countryside by controlling inappropriate development outside settlement limits.

Strategic Policy SP15 – Biodiversity and Geodiversity

The policy focuses on protecting, conserving, and enhancing important habitats, species, and geological sites, including Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs), and National Nature Reserves (NNRs).

Policy EN6 – Important Biodiversity and Geodiversity Sites

Proposals affecting regionally important sites will be permitted only if they conserve or enhance the site's value, or if development cannot be located elsewhere and benefits outweigh the harm.

Policy EN7 – Important Natural Features

Proposals that impact ecologically important features like trees, hedgerows, or watercourses must ensure they are protected or compensated for if removal is unavoidable.

Strategic Policy SP16 – Environmental Protection

Ensures the protection of air, water, and ground quality and aims to reduce pollution. Preference is given to brownfield development over greenfield sites.

Policy EN8 – Pollution and Land Stability

Proposals causing unacceptable pollution or health risks, including air, noise, or water pollution, will not be permitted unless mitigation measures are included.



Strategic Policy SP17 – Minerals

Safeguards mineral resources, including coal, hard rock, and sand, ensuring they are protected unless the development outweighs their potential value.

Policy M1 – Development in Mineral Safeguarding Areas

Development in mineral safeguarding areas is only permitted if the mineral resource is no longer of value, or the development's location and scale would not significantly impact the mineral resource.

Policy TR2 – Design and Access of New Development

Development proposals must ensure safe use of the highway network and not generate unacceptable traffic or safety issues.

Policy BE1 – Design

Promotes high-quality design that enhances the natural, historic, and built environment, with a focus on sustainability, drainage systems, and ecological connectivity.

6.3.2 Replacement Local Development Plan (RLDP) 2023-2038

NPTC is preparing a Replacement Local Development Plan (RLDP) that will cover the period from 2023 to 2038, replacing the adopted LDP 2011-2026. The RLDP will allocate land for homes and employment, protect the unique environment of NPT, and contain policies that provide the basis for decisions on planning applications. The RLDP will assist in integrating the Council's Corporate Plan and Well-being Plan, alongside other Council strategies.

The Council held an eight-week consultation on the Replacement Local Development Plan Preferred Strategy between 12th December 2024 and 6th February 2025. This consultation aimed to gather feedback from the community and stakeholders on the proposed strategy. To deliver the plan's strategic growth, several key sites have been identified.

The Preferred Strategy sets out 18 strategic policies that address the key issues and contribute to delivering the vision and objectives of the RLDP. Some of the key strategic policies include:

Chapter 8: Strategic Policies

Chapter 8 of the RLDP's Preferred Strategy focuses on the strategic policies that will guide development and land use decisions in NPT from 2023 to 2038. These policies are designed to address key issues such as housing, employment, infrastructure, and environmental sustainability.

SP1: Strategic Placemaking Policy SP1 states that development proposals must contribute to creating sustainable places. This is achieved through strategies that enhance communities, support the green growth economy, and protect the natural environment (Policy SP1, para 8.1.1).

For the Proposed Development, this policy requires:

- **Climate Change Adaptation:** The Proposed Development should incorporate appropriate design measures and mitigation strategies to address the impact of climate change (Policy SP1, para 8.1.1). This includes using flood alleviation techniques that not only prevent flooding but also consider long-term environmental changes such as rising sea levels or more frequent storms.
- **Sustainable Locations:** Development should be directed to the most sustainable areas, with a focus on settlements within defined limits. Flood risk should be a key consideration when selecting locations, avoiding areas vulnerable to flood damage (Policy SP1, para 8.1.1.3).
- **Inclusive and Safe Places:** The Proposed Development must ensure that flood mitigation efforts help create vibrant and diverse communities, offering protection to both existing homes and future developments. This aligns with creating safe and welcoming spaces for all (Policy SP1, para 8.1.1.4).



- **Infrastructure Protection:** The Proposed Development must aim to protect and enhance existing infrastructure. This includes maintaining natural drainage systems and reinforcing flood defences to ensure sustainable development, without overburdening local infrastructure (Policy SP1, para 8.1.1.7).

SP2: Climate Change, Policy SP2 emphasises that development proposals must make a positive contribution towards mitigating, adapting to, and building resilience to the impacts of climate change (Policy SP2, para 8.1.2).

For the Proposed Development, this policy requires:

- **Energy Efficiency and Low-Carbon Design:** The Proposed Development should prioritise energy efficiency measures, reducing energy consumption, and promoting low- or net-zero carbon targets. This includes using renewable energy solutions where possible and designing structures that minimise resource use, such as sustainable materials and energy-saving technologies (Policy SP2, para 8.1.2.1).
- **Sustainable Location and Sustainable Transport:** The flood alleviation Proposed Development should be situated in locations that promote sustainable transport and digital connectivity, as well as providing opportunities for active travel such as walking or cycling (Policy SP2, para 8.1.2.7).
- **Flood Risk Avoidance:** As flood risks are a concern, particularly due to Neath Port Talbot's coastal and valley locations, the Proposed Development must be designed to avoid areas at risk of flooding or exacerbating flood risk elsewhere. Development should take place in line with the latest flood risk guidance, ensuring resilience against future climate-related impacts (Policy SP2, para 8.1.2.5).
- **Nature-Based Solutions:** Emphasis should be placed on incorporating nature-based solutions, such as wetland restoration or the creation of green buffers along watercourses, to enhance resilience to climate change and mitigate flood risks (Policy SP2, para 8.1.2.10).

SP3: Nature Emergency, Biodiversity, and the Natural Environment, Policy SP3 requires that all development proposals must contribute to a net benefit for biodiversity and enhance ecosystems resilience, addressing the nature emergency declared in 2019 (Policy SP3, para 8.1.3).

For the Proposed Development, this policy requires:

- **Biodiversity and Protected Species:** The flood alleviation Proposed Development must ensure the protection of identified protected species and habitats within or near the project area. This includes complying with statutory regulations concerning wildlife conservation and safeguarding biodiversity in the face of climate impacts (Policy SP3, para 8.1.3.2).
- **Site Integrity Protection:** Development must protect the integrity of statutory and non-statutory designated nature conservation sites. If such sites are nearby, the Proposed Development should be designed to avoid any adverse impacts, potentially relocating development away from sensitive areas (Policy SP3, para 8.1.3.3).
- **Ecological Connectivity:** The project should support efforts to enhance ecological networks. For example, it could help connect fragmented habitats, improving biodiversity and promoting wildlife corridors (Policy SP3, para 8.1.3.4).
- **Biodiversity Enhancements:** The Proposed Development should implement biodiversity net gain, which could involve habitat restoration, creation of wetlands, or planting native species along the brook to improve the ecosystem's resilience (Policy SP3, para 8.1.3.4).

SP15: Historic Environment, Policy SP15 underscores the need to conserve and enhance the historic environment, which includes townscapes, buildings, heritage assets, and cultural features (Policy SP15, para 8.4.1).



For the Proposed Development, this policy requires:

:

- **Respect for Local Character:** Any development or alteration within the flood alleviation project should respect the local heritage and townscape character. For instance, if the brook is located near conservation areas or important historical structures, the Proposed Development should ensure that heritage values are maintained and enhanced (Policy SP15, para 8.4.1.1).
- **Heritage Protection:** If any heritage assets are present near the flood alleviation works, their protection and enhancement should be prioritised. This includes both designated and non-designated heritage sites, such as historic buildings, canal structures, or areas of cultural importance (Policy SP15, para 8.4.1.3).

SP18: Environmental Protection, Policy SP18 ensures that the quality of the environment is safeguarded, with particular attention to issues such as flood risk, land contamination, and water quality (Policy SP18, para 8.4.4).

For the Proposed Development, this policy requires:

- **Flood Risk and Coastal Erosion:** The Proposed Development must align with national guidance to reduce flood risk and prevent coastal erosion, ensuring that future development in flood-prone areas is avoided. Coastal defences should be strengthened where necessary to mitigate risks exacerbated by climate change (Policy SP18, para 8.4.4.6).
- **Water Quality Protection:** Measures must be put in place to protect water quality, ensuring that runoff from the flood alleviation works does not degrade water resources or lead to contamination. The management of watercourses should take environmental and ecological impacts into account (Policy SP18, para 8.4.4.7).
- **Water Resource Management:** The Proposed Development should ensure the sustainable use of water resources, integrating water conservation measures and employing efficient drainage systems (Policy SP18, para 8.4.4.7).



7. Development Appraisal

This chapter provides an appraisal of the Proposed Development against relevant local and national planning policies set out in Chapter 6, as well as any other material considerations relevant to the Proposed Development. The key issues considered in this appraisal are:

- Principle of Development/Flood consequences
- Drainage and the Water Environment
- Impacts on residential amenity and access during construction
- Ground conditions and geo-environment
- Biodiversity and landscape
- Heritage
- Land use

7.1 Principle of Development/Flood Consequences

The Proposed Development involves enhancement to existing drainage infrastructure to increase its capacity to manage and mitigate flood risk. Therefore it is classified as Water Compatible Development under TAN15. By its nature, the Scheme must be located within areas at risk of flooding in order to deliver its intended function of protecting existing development and infrastructure.

By addressing known capacity constraints within the Grandison Brook drainage system, the Proposed Development will result in a significant improvement to flood risk with a potential 292 residential and commercial properties in Briton Ferry benefitting from flood risk reduction from the 1% (1 in 100) AEP flood event.

There is no negative impact/detriment to third party properties as a result of the proposed works. Elevated flood levels are predicted as a consequence of the Proposed Development in three areas. The Proposed Development has been discussed with NPTC and Network Rail who are responsible for these areas of land. Both bodies have confirmed that in principle they accept the elevated flood levels which are a consequence of the Proposed Development.

For the 1% AEP fluvial event with climate change factored in, the Proposed Development will bring significant benefit compared to the without scheme scenario. There is no detriment or negative effects to fluvial flooding as a result of the Proposed Development that would increase flood risk to any properties.

Through avoidance of ecologically sensitive sites, incorporation of targeted ecological enhancement measures, and adherence to relevant environmental legislation, the Scheme is considered to pose minimal risk to the sustainable management of natural resources.

The Proposed Development will reduce the risk to life, reduce disruption to residents, workers and visitors and will reduce the expected damages to residential and commercial properties. The consequences of flooding associated with the Scheme are acceptable and the flood risk can be managed.

For all of the reasons given above the Proposed Development is in accordance with Planning Policy Wales, TAN 15, Policy SP1 (Strategic Placemaking) in the Neath Port Talbot Local Development Plan and Policy SP2



(Climate Change) and Policy SP18 (Environmental Protection) of the Replacement Local Development Plan Preferred Strategy.

7.2 Drainage and the Water Environment

Works required for the Proposed Development are principally below ground, with minimal changes to surface level or above-ground features on Site, and the surfacing will be restored to its existing condition.

Furthermore, the Flood Consequences Assessment (FCA) has considered the impacts of surface water flows across the Site and concludes that there are no detrimental impacts to surface water flows, i.e., no increases in flood risk as a result of the Proposed Development (compared to the scenario without the Proposed Development) up to the 1 in 1000 (0.1% chance event) including allowances for climate change. Detriment is defined as any increase in flood levels by more than 5mm.

Approval from the Sustainable Drainage Approving Body (SAB) is required for all construction work with drainage implications that cover an area of 100 square metres or more. The SuDS Standards¹ for Wales, particularly, focus on providing means to avoid or mitigate increases in impermeable areas. Developments of this size or larger can significantly impact surface water drainage, necessitating the implementation of Sustainable Drainage Systems (SuDS) to manage on-site surface water. The Proposed Development does not introduce any new impermeable areas. There is no increase in impermeable surfacing beyond that which already exists on site.

The project team has worked proactively and constructively with the Sustainable Drainage Approval Body (SAB) throughout the design process to ensure that drainage matters and flood risk considerations have been appropriately addressed at an early stage. Following review of the proposals, the SAB Authority has confirmed in writing that the development is exempt from the requirement for SAB approval, having regard to the limited scale, nature, and functional purpose of the works.

On this basis, it is concluded that the Proposed Development will not result in any adverse impact on surface water drainage, flood risk, or the surrounding highway or land drainage network.

A Water Framework Directive (WFD) assessment forms part of the planning application for the Proposed Development. The WFD assessment recommends mitigation and preparation of a Construction Environmental Management Plan (CEMP) to avoid or minimise adverse effects on water quality during construction of the Proposed Development.

Provided the mitigation measures recommended in the WFD assessment are implemented, the drainage strategy for the Proposed Development will be in conformity with Strategic Policy SP16: Environmental Protection, Strategic Policy SP4: Infrastructure, Policy EN8: Pollution Control and Policy BE1: Design in the Neath Port Talbot Local Development Plan and Strategic Policy SP18: Environmental Protection in the Replacement Local Development Plan Preferred Strategy.

7.3 Amenity

Before construction commences a Construction Environmental Management Plan (CEMP) will be prepared to minimise adverse effects on amenity during construction. The CEMP will include measures to minimise noise, vibration, dust and light spill impacts.

The Construction Traffic Management Plan (CTMP) outlines the overall strategy for managing construction and delivery traffic to facilitate the Proposed Development. The plan details the programming, phasing, and

¹ [National standards for sustainable drainage systems \(SuDS\)](#)

location of work activities, highlighting the impacts on traffic and access. By utilising different compound locations, the number of trips across the Site will be reduced.

The construction phase traffic for the Proposed Development is expected to increase traffic volumes by only 1.4% on main roads (A474), but the impact will be more significant on Ynysymaerdy Road, especially at its eastern end. The CTMP includes placeholders for further appraisal and assesses construction impacts against peak hourly flows rather than total vehicle numbers. Works at Carreg Hir school are scheduled for the summer to avoid impacting pupils.

Consultation with residents on Ynysymaerdy Road has provided advanced notice of temporary reductions in on-street parking and potential relocation of refuse collection points. Special provisions will be considered to mitigate traffic management impacts on individuals with limited mobility or health issues. The works will progress on a rolling schedule to maintain as much access as possible.

The CTMP outlines specific mitigation measures, as highlighted in policy TR2 – Design and Access of New Development², to minimise the impact of construction traffic for the proposed development, including:

- Liaison with the Highway Authority to agree on traffic measures.
- Precautions to reduce disturbance or inconvenience to affected properties by considering activity timings and durations.
- Site security and signage.
- Measures to control nuisances such as dust emissions and mud spreading.

The mitigation measures will be incorporated into the contractual conditions of the Proposed Development works contract, guiding the contractor's operations throughout the construction period. Consequently, the Proposed Development, with the implementation of the CEMP and the CTMP, complies with the planning policies outlined in Policy TR2: Design and Access of New Development, Policy SP20: Transport Infrastructure, and Policy BE1: Design from the Neath Port Talbot Local Development Plan.

7.4 Geo-environmental Risk Assessment

Based on the ground investigation and subsequent assessment, the potential geo-environmental risks from the Proposed Development are as follows:

- Human Health: Low.
- Controlled Waters: Low.
- Property: Very low.

However, potential risks to future on-site maintenance users within the Ysgol Carreg Hir section of the Site are considered high. Therefore, specific considerations for the Ysgol Carreg Hir section include the engineered cover system installed by Sanctus in 2018, which involves burying asbestos-impacted material 300 to 400 mm below ground level, covered with a high visibility marker liner and clean cover soil.

Where the culvert is to be installed at a depth greater than 0.4 m below ground level, excavation will be required below the cover system layer in this area. Specialist advice will be obtained from a competent asbestos specialist. The work shall be undertaken in line with the Control of Asbestos Regulations 2012 (CAR2012). The CL: AIRE Joint Industry Working Group Decision Tool will be used to determine if the works are notifiable, and mitigation will be implemented for the protection of site workers. Risk assessments and method statements will consider the most appropriate mitigation measures to be implemented.

² Neath Port Talbot Local Development Plan (LDP), adopted in January 2016

The overall considerations implemented as per the Geo-environmental Risk Assessment and local plan policies include:

- Implementation of appropriate health and safety measures, practices, and procedures during construction to mitigate potential risks to construction workers and visitors.
- Adoption of best practice environmental management during construction, such as minimising dust generation and migration, to mitigate potential risks to controlled waters, visitors, and surrounding off-site users.
- Handling and stockpiling Made Ground soils, asphalt/sub-base, and natural soils separately to avoid cross-contamination and facilitate potential reuse or disposal.
- Implementation of a watching brief by a qualified land contamination specialist to recognise and appropriately assess and mitigate unexpected contamination.
- Maintaining vigilance for potential asbestos-containing material at the surface or other unexpected contamination during site clearance and earthworks in areas not previously investigated.
- Conducting a waste classification assessment outside the scope of the Ground Investigation Report. Handling and reusing soils in accordance with a site-specific MMP and the CL: AIRE Definition of Waste Code of Practice or other relevant processes. Classifying soils removed off-site according to the Environment Agency's Technical Guidance WM3.

In conclusion, the geo-environmental assessment complies with the identified planning policies in respect of geo-environmental considerations, particularly those outlined in the Neath Port Talbot Local Development Plan, including Policy EN8: Pollution and Land Stability and Policy SP16: Environmental Protection.

7.5 Biodiversity

An Ecological Impact Assessment was undertaken in July 2022 and this was updated in July 2025. The assessments covered 1 km beyond the Site. It indicated the protected species that are present in the wider area and included a review of available designated sites information within 2 km of the Site for internationally and nationally designated sites and within 1 km for locally designated sites. Supplemental reports document surveys of potential bat roost features (PRF) were undertaken in February 2026 and April 2026. No bat roosts were discovered during these PRF surveys, and it was concluded that the planned felling or other tree works proposed would not have an impact on any roosting bats at the time of the survey. In accordance with recommendations contained within the PRF survey reports, a Construction Environmental Management Plan (CEMP) will specify the requirement for a pre-construction check before felling of any trees covered in ivy, and if any PRF's are found, then an inspection by a competent person will be made before proceeding with tree works.

The latest Ecological Impact Assessment provides a summary of potential impacts of the Proposed Development, the necessary mitigation measures and residual effects on the Important Ecological Features which include nationally and locally designated sites, and valued habitats and species.

7.5.1 Valued Habitats and Species

Habitats

There are no designated sites within the Site, and none identified by the desk study would be affected by the construction of the Proposed Development. The Proposed Development would not result in the permanent loss of habitats within the Site boundary. The impact on scrub, parkland scattered trees, and mixed semi-natural woodland trees would be of slight negative magnitude, resulting in a neutral ecological significance at the local level.



Other vegetation, such as amenity grassland, would also have a slight negative magnitude, resulting in a neutral ecological significance overall. The remaining habitats, would experience slight to moderate negative impacts due to direct and indirect disturbance during construction, leading to a slight adverse ecological significance.

Bats

Construction may reduce available foraging habitats for bats, resulting in a slight negative magnitude. Indirect impacts from light and noise pollution could occur, leading to an impact of slight adverse ecological significance.

Otters

No holts or resting sites were identified on Site. Direct impacts may occur if otters use the Site during construction, particularly with open excavations. Indirect impacts from light and noise pollution are anticipated to be managed, resulting in a slight negative magnitude and neutral significance. This could increase if active holts are found.

Water Voles

No resting sites for Water Voles were identified on Site. Direct impacts may occur if water voles use the site during construction, particularly with open excavations. Indirect impacts from light and noise pollution are anticipated to be managed, resulting in a slight negative magnitude and neutral significance. This could increase if active holts are found.

Breeding and Non-Breeding Birds

Construction may reduce habitat availability for both breeding and non-breeding birds, resulting in a slight negative impact. Clearance during the breeding season (late February to early September) could cause direct mortality, injury, or disturbance. Indirect impacts from noise pollution and disturbance of adjacent habitats are also possible, particularly during the breeding season. Overall, the impact on birds is slight negative, with negligible significance for non-breeding birds and slight adverse significance for breeding birds.

Reptiles and Amphibians

Construction could cause direct mortality, injury, or disturbance to reptiles and amphibians, resulting in a slight negative impact. Further direct impacts may occur if these species use the site during works, especially if excavations are left open overnight. Indirect impacts are not anticipated. Overall, the impact on reptiles and amphibians is slight negative, resulting in neutral significance.

Badgers

No active setts were identified on Site. Direct impacts may occur if badgers use the site during works, particularly with open excavations. Indirect impacts from light and noise pollution are possible but expected to be managed. Overall, the impact on badgers is slight negative, resulting in neutral significance. This could increase if active setts are found prior to or during the work.

European Hedgehog

During construction of the Proposed Development works may cause direct impacts on hedgehogs, particularly if excavations are left open overnight, resulting in trapped or injured animals. Indirect impacts from light and noise pollution are also possible. Overall, the impact on hedgehogs is slight negative, resulting in neutral significance.



Invertebrates

During construction of the Proposed Development works could cause direct mortality and injury to invertebrates. Indirect impacts are limited to light pollution effects on nocturnal species. Overall, the impact on invertebrates is slight negative, resulting in neutral significance.

Fish

In-channel works could impact migratory species through noise or vibration and should be restricted to outside the Natural Resources Wales embargo period (October 15th to May 15th). Indirect impacts from light pollution or noise are negligible. Overall, the impact on fish is negligible, resulting in neutral significance.

7.5.2 Ecosystem Services

Construction impacts will not negatively affect the ecosystem services provided by the Site. There may be slight positive impacts on supporting and regulating services. Cultural services may be affected by indirect effects such as noise and dust. The magnitude of these impacts is negligible, resulting in neutral significance in the wider site context.

The operation phase is not expected to have additional impacts on identified habitats, including bats, European otters, breeding and non-breeding birds, reptiles, amphibians, badgers, and European hedgehogs. Changes in hydrology will be limited to the site itself. Overall, the magnitude and significance of operational impacts are anticipated to be neutral.

7.5.3 Enhancements and long-term restoration

While not specifically required to mitigate impacts from the Proposed Development, the enhancements and long-term restoration will include Ecologically Sensitive Management whilst implementing ecologically sensitive management regimes where possible to provide ecological enhancement. A replacement tree planting scheme on a 3:1 ratio will be developed to have positive impact on biodiversity. Enhancements also include installing bat boxes on retained trees (monitored by a licensed bat worker) and two bird boxes suitable for tit species to both enhance the habitat and limit the use of bat boxes by these birds.

The retained amenity grassland habitats could be enhanced for ecological purposes by reducing management frequency and adopting more ecologically sensitive techniques, such as:

- Infrequent cutting regimes using low ground pressure machines and removing arisings.
- Cutting regimes designed to leave a taller sward and timed to encourage natural wildflower establishment, allowing seed setting.
- Turf removal to create bare areas that can naturally recolonize from the local seed bank, with light grass seeding where necessary to accelerate cover.

7.5.4 Summary

The Site features a culvert network running beneath an urbanised and residential area. To the south, there is a large cemetery and a public park with a public right of way lined with mixed species trees. The area includes amenity grassland, a bowling green, a rugby/cricket club, and a football club. Further west, separate from the main works area, the culvert is exposed again and channels down to the local railway, ending in an open channel with significant aggregations of Japanese Knotweed.

NPTC plans to undertake maintenance or replacement works, with minimal operational changes expected to impact the site's biodiversity.



Potential indirect construction impacts on protected species will be largely mitigated through the following measures, guided by specific method statements, pollution and sediment management plans, and toolbox talks such as:

- **Precautionary Clearance:** Adopt a two-staged clearance approach with full ecological checks. Initial vegetation cut to 150mm (300mm for woody species), followed by detailed ecological checks. Arisings will be removed or used to create habitat piles in designated areas.
- **Seasonal Clearance:** Conduct clearance during appropriate seasons for ecological receptors, such as the active reptile season (April to September), with mitigation for nesting birds through ecological checks.
- **Tree Removal:** Adhere to BCT guidance for potential bat roosts; tree removal is not anticipated.
- **Pre-Work Checks:** Conduct pre-work checks by experienced ecologists for protected species, including nesting birds, otters, water voles, badgers, reptiles, amphibians, bats, and other highlighted species.
- **Root Protection:** Ensure works near trees do not impact root protection zones.
- **Lighting:** Use directional and low-level lighting to minimise light spill into retained and adjacent habitats.
- **Noise and Vibration:** Minimise noise and vibration impacts, especially during sensitive periods like breeding, hibernation, and migration seasons.
- **Fish Embargo:** Restrict works near water bodies during the migratory fish embargo (15th October – 15th May) unless agreed with the county ecologist.
- **Excavation Safety:** Cover or close excavations overnight to prevent trapping animals; provide escape routes if fencing is not possible.
- **Night-Time Work:** Restrict night-time work near trees.
- **Site Compounds:** Place site compounds, storage, and laydown areas carefully to maintain connectivity for protected species and use noise barrier fencing to reduce impacts.
- **Barrier Fencing:** Use secure, clearly identified barrier fencing to prevent accidental encroachment into retained/adjacent areas.
- **Access Routes:** Clearly identify access routes, maximising the use of existing roads and hardstanding areas.
- **Material and Waste Management:** Implement appropriate plans, including contingency measures, and avoid refuelling and parking near watercourses.
- **Dust Suppression:** Use dust suppression measures and provide spill kits near high-risk areas.
- **Ecological/Environmental Clerk of Works:** Involve an Ecological/Environmental Clerk of Works during clearance and construction to address emerging risks.
- **Designated Sites:** No direct impacts had been identified on designated sites, so no mitigation measures are required.
- **Habitats:** Identified habitat losses are assessed to be of slight adverse significance at the Site and local level, necessitating mitigation.

The Ecological assessment concludes that the Proposed Development complies with the identified planning policies, including Policy EN6: Important Biodiversity and Geodiversity Sites, Policy EN7: Important Natural Features, Policy SP15: Biodiversity and Geodiversity, and Policy BE1: Design. The Proposed Development incorporates comprehensive mitigation measures to address potential impacts on protected species and



habitats, ensuring alignment with the Neath Port Talbot Local Development Plan. These measures include precautionary clearance, seasonal clearance, root protection, lighting management, noise and vibration minimisation, and excavation safety, among others. By adhering to these policies and implementing the recommended mitigation strategies, the Proposed Development aims to preserve and enhance the ecological value of the site while minimising adverse effects.

7.6 Heritage

The Proposed Development will result in impacts upon the Scheduled Monument of Ynysmaerdy Incline (GM489) and Jersey Park Registered Park and Garden (PGW(Gm)62(NEP)). These impacts will arise from the construction of new flood attenuation tanks (within Jersey Park), associated pipework, ditches, and retaining/head walls.

The construction of the Proposed Development is expected to impact potential archaeological remains associated with the Railway Incline. Excavations for the new pipework and ditch to the south of the play park require ground disturbance within the Scheduled Monument, potentially affecting industrial archaeological remains. The construction of the attenuation tank will impact the former route of an embankment that joined the Railway Incline in the area of the children's playground. Historical maps indicate the presence of this embankment, but site inspections noted no visible trace, suggesting reduced potential for associated archaeological remains to survive.

The Proposed Development will result in physical impacts on the Ynysmaerdy Railway Incline in two locations. In the first location, to the south of the play area within Jersey Park, impacts to the Ynysmaerdy Incline will result from the following design proposals:

- Excavation for installation of pipework, hydrobrake flow control chambers, and manholes.
- Formation of a new ditch with a headwall.

In the second location, to the east of Jersey Park and Ynysmaerdy Road, impacts to the Ynysmaerdy Incline will result from:

- Formation of a new earth retaining bank with a raised footpath aligned along the crest of the bank along the former route of the Railway Incline.
- Excavation of a ditch 1.5m deep with a concrete headwall with sloped grating to the south of the existing footpath, adjacent to Incline Cottage.
- Regrading of the existing footpath to provide a 1 in 20 cross fall towards the new ditch.
- Minor earthworks to top off low spots along the existing embankment along the north side of the Railway Incline and a shorter extent to the south of the Incline.

Scheduled Monument Consent is required as the Proposed Development will result in permanent physical impacts to the Scheduled Monument and the loss of fabric associated with the monument, where excavation of new ditches is proposed and for the installation of new pipework.

The Proposed Development will detract from the evidential value of the asset and decrease legibility of the Incline at these two locations. New elements will be introduced into the Scheduled Monument through the construction of the headwall with sloped grating to the north of Ynysmaerdy Road in the area of the Rhodfa Clarke footpath and further west within Jersey Park and a ditch with a headwall to the south of the play park. These modern engineered elements will detract from the integrity of the monument in two limited areas.

Therefore, archaeological evaluation is recommended across the Proposed Development footprint within Jersey Park to assess the presence and survival of archaeological remains. Scheduled Monument Consent is required for these evaluation works, separate from the main works application. Consultation with Cadw and the Glamorgan Gwent County Archaeologist will be undertaken to agree on the scope and methodology. A



site walkover with Cadw representatives is recommended to identify the location and methodology for reinstatement of the Incline Banks and proposed headwall and footpath works along the Rhodfa Clarke footpath.

Archaeological investigations are ongoing to inform the exact location of infrastructure to minimise impacts on the Incline and on Jersey Park.

The Proposed Development will have a direct, physical impact on Jersey Park and on its setting. Physical impacts to Jersey Park will occur in the area of the play park and on the Railway Incline adjacent to this.

Overall, while the Proposed Development will result in localised harm to archaeological remains and the appearance of the Ynysmaerdy Incline and the registered park and garden, several measures are recommended to minimise and mitigate these impacts. These measures include detailed design adjustments to reduce ground disturbance, sensitive material usage, and vegetation reinstatement. Additionally, improvements to the playpark and picnic area, as well as opportunities for enhancement of the Scheduled Monument, are proposed. These recommendations aim to ensure that the Proposed Development aligns with Strategic Policy SP21: Built Environment and Historic Heritage and Policy BE1 – Design in the Neath Port Talbot Local Development Plan and with Policy SP15: Historic Environment in the Replacement Local Development Plan Preferred Strategy.

7.7 Land Use

During construction the works will be programmed to minimise the impact of the temporary closure of the cricket and rugby pitches and allotments on physical and mental health and well-being. Following construction, the land will be reinstated to its pre-construction condition and flood risk will be reduced to enable the sporting and recreational land uses to continue. Therefore, with mitigation, the Proposed Development aligns with the health and well-being objectives in the Well-being of Future Generations (Wales) Act 2015, the National Plan 2040, Planning Policy Wales, NPT LDP Strategic Policy SP3, Strategic Policy SP4.

8. Summary

The Pantyrheol area in Briton Ferry frequently experiences flooding that affects both residential and commercial properties. To address this, AtkinsRéalis has been instructed by NPTC to seek a full planning permission to undertake the proposed flood alleviation scheme associated with Grandison Brook. This Planning, Design, and Access Statement (PDAS) supports the planning application.

The Proposed Development involves a series of works to increase the drainage system's capacity in order to reduce flooding risks in Briton Ferry, specifically to properties along the Grandison Brook. The Proposed Development will deliver climate change adaptation and improve resilience by reducing the risk of flooding in Briton Ferry. There will be a significant improvement to flood risk if the Proposed Development is constructed with a total of 292 properties in Briton Ferry benefitting from flood reduction from the 1 in 100-year event (1% Annual Exceedance Probability, AEP). The Proposed Development includes surface water management solution to ensure that runoff is directed into the proposed drainage infrastructure.

The Proposed Development includes culvert installations; a buried surface water storage tank; refurbishment of an existing inlet structure and a flood defence bund to protect a railway line.

The LPA has adopted an EIA screening opinion confirming that the Proposed Development does not constitute EIA development. The screening opinion included feedback from highways and drainage officers at NPTC on what would be expected to be included in a planning application for the Proposed Development.

A set of design principles were established to inform the design process for the Proposed Development. The design has evolved through more hydraulic modelling and through consultation with stakeholders. As a result, the project has been expanded and mitigation strategies developed to ensure a more robust and effective flood mitigation solution whilst avoiding or minimising adverse effects on nationally important heritage assets and on recreational facilities.

Construction of the Proposed Development will be carefully programmed to minimise the impacts arising from the temporary closure of recreational facilities. The Proposed Development includes an enhancement to the walking route along the Incline by strimming the adjacent vegetation to remove narrow pinch points along the route.

A CTMP has been prepared which proposes a range of mitigation measures to avoid or minimise conflict with pedestrian and vehicular access to adjacent land uses. The CTMP, along with the CEMP, will ensure adverse impacts on local amenity will be avoided or minimised.

Potential geo-environmental risks from the Proposed Development will be managed through adherence to legislation controlling the management of asbestos. The construction stage will involve the consumption of natural resources and the generation of greenhouse gas, so where possible, and in accordance with NPTC procurement policies, local and sustainable material choices will be considered, and transport options will consider climate impacts.

The Proposed Development incorporates comprehensive mitigation measures to address potential impacts on protected species and habitats. Any vegetation lost as a result of the Proposed Development will be reinstated and the loss of small trees will be mitigated by 3:1 compensatory tree planting to enhance biodiversity and to help offset carbon emissions.

The Proposed Development is in accordance with national and local planning policy and therefore, the LPA is respectfully requested to grant planning permission.



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