

PLANNING STATEMENT

**Land at Leiros Parc,
Bryncoch,
Neath**

July 2026



Summary

Proposal

Outline planning application (with all matters reserved except for access) for the construction of up to 250 residential dwellings, public open space, green infrastructure, a small flexible mixed-use/community space, sustainable drainage features, access arrangements, and all associated landscaping and infrastructure works.

Location

Land at Leiros Parc, Bryncoch, Neath.

Date

July 2026

Project Reference

S24.154

Client

Codi Group

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Introduction

- 1.1 Asbri Planning is appointed as planning agent to Codi Group to prepare this Planning Statement to accompany the proposed outline planning application (with all matters reserved except for access) for the construction of up to 250 residential dwellings, public open space, green infrastructure, a small flexible mixed-use/community space, sustainable drainage features, access arrangements, and all associated landscaping and infrastructure works at land at Leiros Parc, Bryncoch, Neath.
- 1.2 The site is allocated for housing within the adopted Neath Port Talbot Local Development Plan (LDP).
- 1.3 The purpose of this Planning Statement is to provide a clear and logical document to outline the planning considerations and planning policies relevant to the proposal. The document also acts as a method of demonstrating the details of the planning application in a way that can be read both by professionals and the public.
- 1.4 The Planning Statement acts as a supporting document to the accompanying planning application and should be read in conjunction with all other elements of the application. The following drawings prepared to accompany the application:

Drawing Name	Drawing Reference
Location Plan	LP-01-Rev2
Illustrative Masterplan	IMP-01
Land Use Plan	LU-01
Open Space Plan	OS-01
Active Travel Plan	ATR-01
Street Hierarchy Plan	SH-01
Existing Site Plan	SK-29
Drainage Layout	SK23-E
Plateau Layout	SK20-H
Plateau Section Sheet 1	SK21-E
Plateau Section Sheet 2	SK30
Vehicle Tracking Sheet 1	SK31-A
Vehicle Tracking Sheet 2	SK32
Green Infrastructure Strategy	TC24246-LA.1-V5
Planting Strategy	TC24246-LA.2-V5
Play Strategy 1	TC24246-LA.3-V5
Play Strategy 2	TC24246-LA.4-V4
Play Strategy 3	TC24246-LA.5-V4
Topographical Survey Sheets 1 - 7	31104S-1-RevA

1.5 In addition, the following supporting documents are submitted.

Document Name	Prepared By
Planning application forms (1APP)	Asbri Planning
Planning Statement	Asbri Planning
PAC Report	Asbri Planning
Covering Letter	Asbri Planning
Archaeological Desk Based Assessment	Archaeology Wales
Coal Mining Risk Assessment	Terra Firma
Intrusive Coal Mining Risk Assessment	Terra Firma
Design and Access Statement	Hammond Architectural
Flood Risk Assessment and Drainage Strategy Note	CB3 Consult
Landscape and Visual Appraisal	Tir Collective
Green Infrastructure Statement	Tir Collective
Noise Impact Assessment	Acoustic Consultants
Geotechnical Appraisal	Quantum Geotech
Geotechnical and Geoenvironmental Site Investigation Report	Terra Firma
Travel Plan	Asbri Transport
Transport Assessment	Asbri Transport
Arboricultural Report	ArbTS
Ecological Appraisal	EDP
Site Waste Management Plan	Hale Group
Energy Statement	Codi Group

1.6 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:

- Section 2: provides a description of the site and its surroundings, including a review of the site's planning history;
- Section 3: summarises the development proposals.
- Section 4: provides an overview of pre-application dialogue undertaken in regard to the emerging scheme.
- Section 5: outlines the relevant planning policy context, at both the national and local level.
- Section 6: addresses the key planning considerations associated with the development proposal.
- Section 7: provides a conclusion regarding the overall acceptability of the application.

Site Description

Site Description

- 2.1 The application site shown in Figure 1 comprises several enclosed greenfield parcels on a south-facing slope, with existing woodland and hedgerows defining the separate fields. The site includes a former farmyard which is partially used as allotments, agricultural fields, hedgerow and areas of semi-improved grassland, scrub and woodland along with an old stone barn.



Figure 1: Aerial image of site from April 2025 (Source: Google Maps)

- 2.2 Field boundaries are unmanaged and consist of mature trees and shrubs. To the north of the site is farmland and Gilfach Quarry whereas to the west is Leiros Farm and Gilfach Road providing access to the quarry. Leiros Parc Drive and Daphne Road adjoin the site's southern boundary, whereas dense woodland covers a steep topography to the east.
- 2.3 The site extends to approximately 11.79 hectares and is located north of Neath town centre, and approximately 300 metres to the east of the A474. Built development extends for over 2 kilometres along this road, which lies within Bryncoch. To the east of the site along the A4230 is the settlement of Cadoxton.
- 2.4 Much of Leiros Parc Drive comprises of detached houses and bungalows constructed during the 1970s/1980s. Further west along Alexander Road, dwelling types are mainly semi-detached and linked properties. Along Gilfach Road, properties date from the inter-war period, and include larger, detached houses set within generous plots. Traditional terraced properties lie in Cadoxton below a wooded embankment.
- 2.5 The site is well located in terms of access to the wider road network. Aforementioned, the site is within close proximity to the A474 Penywern Road, connecting Neath with Pontardawe as well as linking to the A465 Heads of the Valleys Road. The A465 provides direct access to the M4 Motorway at junction 43.

- 2.6 In terms of public transport provision, the nearest bus stops are located on Herons Way, Penywern Road, Llygad-Yr-Haul Road and Cadoxton Road providing journeys to several destinations including Neath, Pontardawe, Coelbren and Llandarcy. Neath Railway Station is located approximately 1.5km south of the site and receives a regular service from Great Western Railway and Transport for Wales.
- 2.7 There are multiple public rights of way contained within the site boundary, as shown in Figure 2. The public rights of way map highlights both the footpaths (orange) and bridleways (blue) contained within or running along the boundaries of the application site.

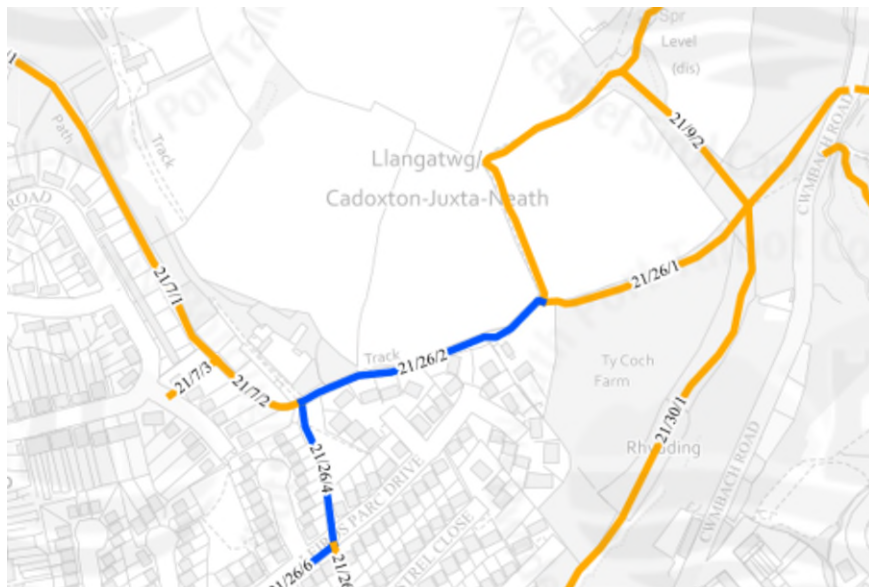


Figure 2: Public Rights of Way Map (Source: Neath Port Talbot Council)

- 2.8 The site is located 1.5 kilometres north of Neath town centre which contains ample services and facilities. Neath town centre houses cafes, restaurants, public houses, and a number of retail outlets. Nearby schools to the site include Catwg Primary School, and Blaenhonddan Primary School, as well as Dwr y Felin Comprehensive, which are all within 1.2 kilometres. Cadoxton Park is 180 metres east of the site, and Pen y Wern Playing Fields are located approximately 730 metres to the south west. In terms of leisure uses, nearby facilities include Neath Sports Centre, Neath Leisure Centre and Neath Golf Club.
- 2.9 A review of the Natural Resources Wales (NRW) Flood Map for Planning (FMfP) contained in Figure 3, reveals that the site does not sit within the most vulnerable zone, however a section along its south-western boundary is prone to surface water flooding.



Figure 3: Flood Map for Planning (Source: Natural Resources Wales)

- 2.10 A review of the Coal Authority Map in Figure 4 shows that some of the northern and eastern parts of the site are located within a development high risk area.



Figure 4: Development High Risk Areas (Source: Mining Remediation Authority)

- 2.11 A review of the Cadw map reveals that there are no Listed Buildings and Schedule Monuments located within or adjacent to the site boundary. Additionally, the site is not located within any Registered Parks and Gardens, World Heritage Sites, or Registered Historic Landscapes.
- 2.12 Aforementioned, the site is allocated for housing within the adopted Neath Port Talbot LDP. Under Policy H1 of the LDP, the site is identified as a housing allocation for approximately 200 dwellings under reference H1/2 (Leiros Parc Extension) as illustrated in Figure 5.

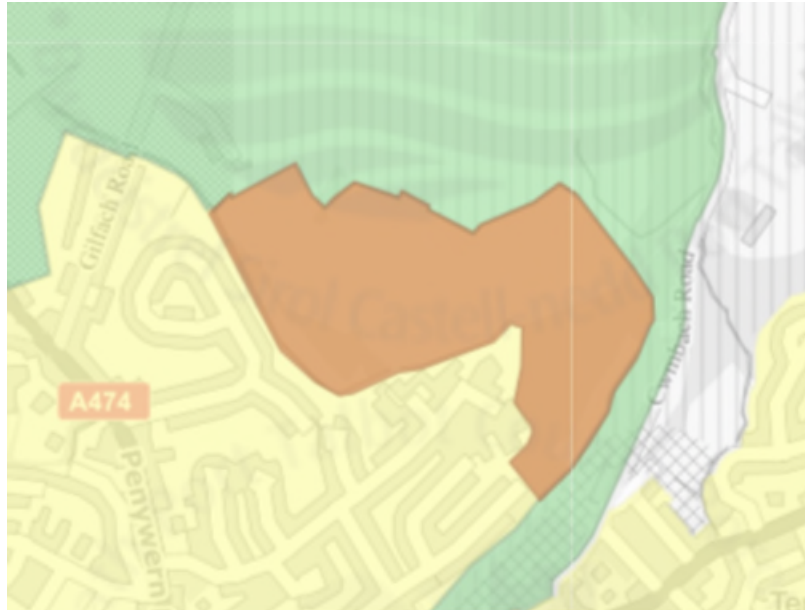


Figure 5: LDP Proposals Map (Source: Neath Port Talbot Council)

Planning History

- 2.13 A planning application was submitted on 10th November 2020 (Reference: P2020/1020) for the development of 200 residential dwelling and associated works at the site. The application was subsequently withdrawn on the 23rd April 2021.
- 2.14 A further pre-application enquiry was submitted on 2nd May 2023 (Reference: Q2023/0091). The response confirmed that the principle of development was considered acceptable subject to detailed design.
- 2.15 A search of the Neath Port Talbot County Council planning application search reveals the site has the following relevant planning history:

Reference	Proposals	Decision / Determination Date
N1998/0580	Residential development	Refused 17/09/1988
P2007/1341	Outline planning application for residential dwellings	Withdrawn 14/03/2008
P2008/0642	Outline planning application for two residential development	Refused 14/03/2008
P2017/0356	Request for a screening Opinion (EIA Regulations) for the development of 200 dwellings and associated infrastructure.	Not EIA Development 24/04/2017
P2017/0442	Construction of a double garage, raised patio, steps and path, and front porch at Ty Coch Farm, Rhyddings, Neath, SA10 8ED	Approved 06/06/2017
P2020/1020	Full planning application for the development of 200 residential dwellings and associated works.	Withdrawn 23/04/2021

Proposals

- 3.1 This application seeks outline planning consent (with all matters reserved except for access) for the construction of up to 250 residential dwellings, public open space, green infrastructure, a small flexible mixed-use/community space, sustainable drainage features, access arrangements, and all associated landscaping and infrastructure works. The development of circa 250 homes will comprise a mix of two-storey dwellings and apartments. One third of the homes are to be affordable in tenure, however the precise housing mix and tenure will be confirmed at reserved matters stage. In addition to this, a mixed-use community hub/building will be delivered to support local services and community activity. Details of the scale parameters for both the residential development and mixed use building have been included within the Design and Access Statement and have been reproduced below in Table 1.

PARAMETERS FOR RESIDENTIAL DEVELOPMENT	PROPOSED RANGE / MAXIMUM	PARAMETERS FOR MIXED USE BUILDING	PROPOSED RANGE / MAXIMUM
General building height	2 storeys	General building height	1 storey
Residential unit types	1-2 bed flats (2 storey blocks) 2, 3 and 4 bed houses	Ground floor use height	2.6m – 3.5m floor-to-ceiling
Building typologies	Detached, semi-detached and short terraces, Flats	Roof form	Flat or shallow pitch (up to 15 degrees)
Indicative block width	4.5m – 9.0m (houses) 16.5m – 19.5m (2-storey flat blocks)	Building footprint (approx.)	Up to 120 m ² GIA, comprising up to two single-storey modular / container-style buildings, subject to detailed design.
Indicative building depth	9.0m – 11.0m (houses) 10.0m – 19.5m (flat blocks)	Massing form	Linear or L-shaped arrangement
Indicative ridge heights	8.5m – 10.0m (houses) 8.0m – 10.0m (flat blocks)	Use flexibility	Capable of accommodating café/shop, community space, workspace or garden-related uses
Density indicator	Circa 35 dwellings / ha	Siting principle	Positioned to address public open space, movement routes or activity nodes

Table 1: Parameters for residential development and mixed use building (Source: Hammond Architectural)

- 3.2 The proposal has been developed to compliment the features of the site, such as the sloping terrain and existing green infrastructure whilst paying regard to the site's position within an established urban area surrounded by residential development. The site has a steep topography therefore the development will need to take account of this. The Land Use Plan included in Figure 6 shows that less than half of the site will consist of residential development. The community hub area at the southern end of the site will comprise less than 1% of the development site, whereas public open space, growing space and ecotone form over 40% of the site, illustrating how the development will be landscape/green infrastructure led.

- 3.7 The internal layout of the proposed development has been designed with sufficient width and geometry to accommodate bus movements. A standard 12 metre bus is able to access and egress the site via Daphne Road which has been confirmed via vehicle tracking, with secondary streets typically reducing to 5.5 metres. Parking is typically provided on plot and will be in accordance with SPG standards.
- 3.8 It is considered that the scheme adopts a wholly green infrastructure led approach towards design as illustrated in the Green Infrastructure Strategy included in Figure 7, enabling biodiversity and ecological enhancement. In terms of landscape and green infrastructure works, the retention and enhancement of existing trees and vegetation, retention of the existing footpath routes, and the integration of new areas of public open space have informed the development proposals. New hedgerow, tree planting and woodland will be introduced along with ample play provision including seating areas, climbing equipment and stepping logs. Approximately 22% of the site layout will consist of parkland and informal public open space.



Figure 7: Green Infrastructure Strategy (Source: Tir Collective)

- 3.9 The existing trees along the northeastern and eastern boundaries of the site are to be retained. Adequate separation distances between the development and the area of woodland to the east are proposed in order to protect valuable green infrastructure at this end of the site. Moreover, the wooded areas along the south west and western boundaries are to be retained and restored in order to further contribute to the availability of public open green space on site, as well as improve separation distances and screening of existing residential properties. Adequate vegetation providing screening for nearby dwellings is also proposed along the southern boundary of the site.
- 3.10 The design team will finalise the energy strategy through future detailed design considering the following:
- A “fabric first” approach and passive design measures to reduce the energy demand of the development.

- PV panels are to be provided on the roof as illustratively shown on the proposed drawings. These are to be set into the plane of the roof to reduce their visual impact.
- An all-electric energy solution will be explored for both heating and water. Solutions include air/ground-source heat pumps for hot water and solar photovoltaic panels for on-site energy consumption.
- Further energy saving measures such as low energy lighting and electric vehicle charging points will be considered at a later date.

- 3.11 In accordance with Part 1A of the 'Town and Country Planning (Development Management Procedures) (Wales) (Amended) Order 2016' (DMPO 2016), all major developments are required to be subject of statutory pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority.
- 3.12 A full comprehensive summary of the pre-application consultation will be included within the accompanying pre-application consultation report, following responses received by statutory/specialist consultees as well as local councillors, community groups and residents.
- 3.13 A formal pre-application consultation took place between 16th January 2026 and 16th February 2026 with site notices displayed, letters sent to statutory, other and community consultees, along with adjoining residents.

Pre-Application Discussions

- 4.1 Extensive discussions have been held with the Council regarding the development of this site. A pre-application was submitted on 31st January 2025 for a proposed outline planning application for a residential development of circa. 258 homes and associated works (subject to confirmed access strategy).
- 4.2 A pre-application response was provided by Neath Port Talbot Planning Department on 4th June 2025 which confirmed that the principle of development was considered acceptable subject to compliance with LDP Policy H1/2 and other material considerations. Feedback was also provided in relation to highways and active travel, biodiversity and trees, drainage, contamination and other material considerations. The response concluded with a recommended list of supporting documentation to accompany a future planning application. Further details of the pre-application response are contained within page 23 of the submitted Design and Access Statement.

Planning Policy Context

Introduction

- 5.1 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires *“public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”*.
- 5.2 The Well-being of Future Generations (Wales) Act 2015 plays a significant role in shaping the planning system in Wales, embedding sustainable development principles into planning policy and decisions. The Act reinforces the planning system’s shift towards a holistic, sustainable approach, emphasising that planning in Wales must consider not just present needs but also the well-being of future generations.
- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.4 The Development Plan comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
 - Neath Port Talbot County Borough Council Local Development Plan 2011 - 2026 (January, 2016)
- 5.5 In addition to the Development Plan, the Planning Application has been informed by Policy and Guidance set out in the following:
- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
 - Neath Port Talbot County Borough Council Supplementary Planning Guidance

The Development Plan

- 5.6 The development plan comprises Future Wales and the Neath Port Talbot County Borough Council Local Development Plan (January 2016).

National Development Framework: Future Wales – The National Plan 2040

- 5.7 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. ‘Future Wales’ sets out the Welsh Government’s strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.
- 5.8 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Pages 54-56 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years’ time, as follows:

A Wales where people live:

- 1 *...and work in connected, inclusive and healthy places*
- 2 *...in vibrant rural places with access to homes, jobs and services*
- 3 *...in distinctive regions that tackle health and socio-economic inequality through sustainable growth*
- 4 *...in places with a thriving Welsh Language*
- 5 *...and work in towns and cities which are a focus and springboard for sustainable growth*

- 6 ...in places where prosperity, innovation and culture are promoted
- 7 ...in places where travel is sustainable
- 8 ...in places with world-class digital infrastructure
- 9 ...in places that sustainably manage their natural resources and reduce pollution
- 10 ...in places with biodiverse, resilient and connected ecosystems
- 11 ...in places which are decarbonised and climate-resilient

Placemaking

5.9 Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that *“Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration”*.

5.10 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

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

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*
- *integrating green infrastructure, informed by the planning authority’s Green Infrastructure Assessment.”*

5.11 Further detail on the Welsh Government’s strategic placemaking priorities is set out at Page 66 of Future Wales. Key placemaking principles are summarised below:

Mix of uses

To create activity throughout the day and enable people to walk and cycle, rather than being reliant on travelling by car, places should have a rich mix of residential, commercial and community uses within close proximity to each other. Urban growth and regeneration should integrate different uses within neighbourhoods.

Variety of housing

To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.

Walkable scale

To enable active and healthy lives, people should be able to easily walk to local facilities and public transport. Urban growth and regeneration should be focused within inner city areas and around town centres, as well

as around mixed-use local centres and public transport. Co-working hubs offering an alternative to home-working are an important feature of the economy, and these should be located in town and local centres.

Density

To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. It may be necessary to take social distancing requirements into consideration when designing public and communal spaces.

Street network

To provide a framework for different uses and types of housing to be integrated within neighbourhoods, urban growth and regeneration should be based on a network of streets that enable social distancing if necessary. The street network should be permeable, with streets primarily connecting at both ends with other streets and providing links into, out of, and through places. The street network should have a hierarchy, with streets that have different characters and functions.

Plot-based development

To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and local builders, urban growth and regeneration should provide opportunities for the development of small plots. A plot-based approach to development should be promoted, including the subdivision of larger sites to be built in small plots or as a group of plots.

Green infrastructure

To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration. Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated.

Housing

- 5.12 It is stated at Page 73 of Future Wales that *"the planning system has a long-established role in the delivery of affordable housing. We are committed to ensuring that new housing meets the needs of all members of society especially those unable to afford to buy on the open market. Echoing the strategic placemaking principles in policy 2, sustainable places are inclusive and welcoming to all; they do not exclude sections of the community or create ghettos of the affluent and the poor"*.
- 5.13 Policy 7 is of key relevance in regard to the delivery of affordable housing, which states the following *"The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through their Strategic and Local Development Plans planning authorities should develop strong evidence-based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing"*.

Biodiversity and Green Infrastructure

- 5.14 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires *"an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable"* (page 76).

5.15 In addition to this, the associated importance of green infrastructure is highlighted:

“As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being” (page 78).

5.16 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

Policy 9 – Resilient Ecological Networks and Green Infrastructure

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.*

Transport

5.17 Future Wales identifies that transport in Wales is currently dominated by the car and that *“our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people’s everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people’s health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation” (page 85).*

5.18 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *“to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel” (page 85).*

Local Level

5.19 The Neath Port Talbot County Borough Council LDP was adopted in January 2016 and comprises part of the prevailing development plan for the area.

5.20 The following LDP policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
SP1	Climate Change
SP2	Health
SP3	Sustainable Communities
SP4	Infrastructure

SP5	Development in the Coastal Corridor Strategy Area
SP7	Housing Requirement
SP8	Affordable Housing
SP10	Open Space
SP15	Biodiversity and Geodiversity
SP16	Environmental Protection
SP18	Renewable and Low Carbon Energy
SP19	Waste Management
SP20	Transport Network
SP21	Built Environment and Historic Heritage
SC1	Settlement Limits
I1	Infrastructure Requirements
H1/2	Housing Allocations: Leiros Park Extension
AH1	Affordable Housing
OS1	Open Space Provision
OS2	Protection of Open Space
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
EN8	Pollution and Land Stability
RE2	Renewable and Low Carbon Energy in New Development
W3	Waste Management in New Development
TR2	Design and Access of New Development
BE1	Design

National Policy and Guidance

Planning Policy Wales Edition 12

- 5.21 Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.
- 5.22 Sustainable Development is defined at Page 7 of PPW as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*.
- 5.23 Paragraph 1.18 sets out that *"Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated"*.

Placemaking

- 5.24 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example states that *“Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities”*.
- 5.25 It is summarised succinctly at Paragraph 2.3 that *“The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all”*.
- 5.26 Placemaking is defined at Page 14 of PPW as follows:
- “Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and wellbeing in the widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings”*.
- 5.27 A set of ‘national sustainable placemaking outcomes’ are outlined on page 17 of PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:
- *Growing our economy in a sustainable manner*
 - *Making Best Use of Resources*
 - *Facilitating Accessible and Healthy Environments*
 - *Creating & sustaining communities*
 - *Maximising environmental protection and limiting environmental impact*
- 5.28 It is highlighted at Paragraph 2.20 that *“Not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being”*.
- 5.29 The implications of COVID are highlighted in Paragraph 2.22, stating for example that *“We must ensure that a post-Covid world has people’s well-being at its heart. Planning Policy Wales leads the way in this respect and contains the principles and policies needed for us to recover from this situation in a positive manner. In July 2020 the Welsh Government published Building Better Places⁹ which pinpoints the most relevant policy priorities and actions to aid in the recovery”*.
- 5.30 Paragraph 2.23 confirms that *“Building Better Places recognises the pivotal role that planners play in shaping our society for the future. They must plan for our priorities around placemaking, decarbonisation and well-being. Building Better Places starts to identify action to achieve this and upon which we must build; future reviews of Planning Policy Wales will enable us to further integrate this work. Everyone has a part to play to ensure that the communities of tomorrow benefit from the foresight of today”*.

Good Design

- 5.31 The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW where it is stated that *“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development,*

design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area”.

5.32 Good design must enable development proposals to address the issues of inclusivity and accessibility for all, and it is highlighted at Paragraph 3.6 that *“This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport”.*

5.33 In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals - Paragraph 3.7 states for example that *“Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution”.*

5.34 The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8:
“Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places”.

5.35 Paragraph 3.12 outlines that good design is also about avoiding the creation of car-based developments by minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. It is stated that *“Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate”.*

Sustainable Transport

5.36 PPW advises at Paragraph 4.1.10 that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:

- *“are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling”.*

5.37 Paragraph 4.1.11 summarises that: *“Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services”.*

5.38 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. Paragraph 4.1.13 sets out that *“The sustainable transport hierarchy should be used to reduce the need to*

travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport”.

Active Travel

- 5.39 The importance of developing local active travel networks to help mitigate the impact of new development by providing an alternative mode of travel to the private car is highlighted in PPW. It is stated at Paragraph 4.1.30 that *“Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice”.*

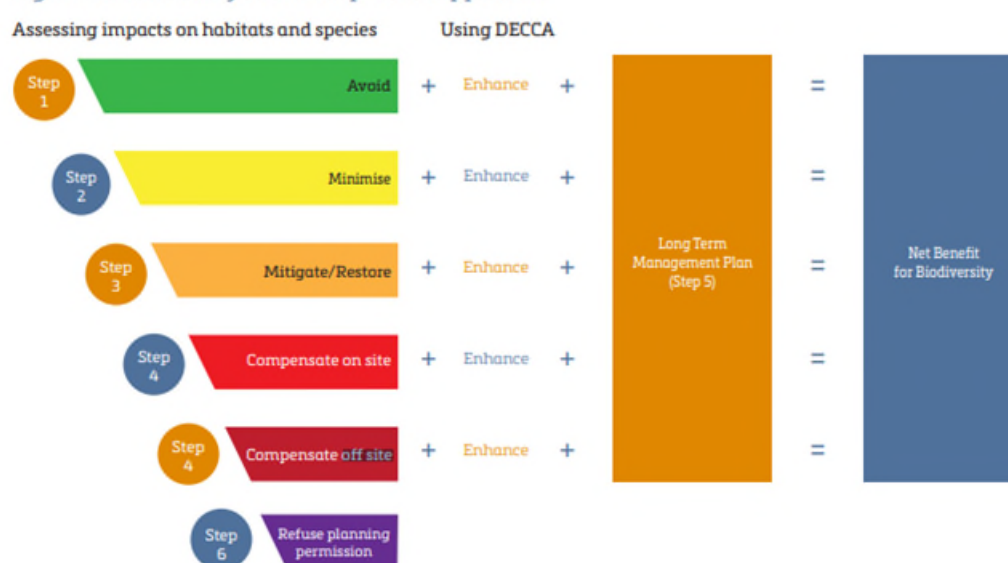
Public Transport

- 5.40 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this *“by locating development where there is, or can be, good access by public transport”.*

Green Infrastructure

- 5.41 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.11 that *“The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes”.*
- 5.42 Paragraph 6.2.12 confirms that *“A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied”.*
- 5.43 The Step-Wise Approach is depicted at figure 12 of PPW 12 and discussed at paragraph 6.4.15 which confirms that the first priority for planning authorities is to avoid damage, if that is not possible then there is a requirement to minimise, mitigate, compensate on site, and then only as a last resort off-site compensation for unavoidable damage must be provided.

Figure 12: Summary of the Step-Wise Approach



Sustainable Drainage Systems (SuDS)

- 5.44 The importance of considering SuDS as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *"The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development"*. It is advised at Paragraph 6.6.19 that *"Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified"*.

Technical Advice Notes

- 5.45 The following Technical Advice Notes (TANS) are of relevance to the proposed development:

- TAN 2 – Affordable Housing (2006)
- TAN 5 – Nature Conservation and Planning (2009)
- TAN 10 – Tree Preservation Orders (1997)
- TAN 11 – Noise (1997)
- TAN 12 – Design (2016)
- TAN 15 – Development, Flooding and Coastal Erosion (2025)
- TAN 16 – Sport, Recreation and Open Space (2016)
- TAN 18 – Transport (2007)

Local Planning Authority Supplementary Planning Guidance

- 5.46 The following Supplementary Planning Guidance (SPG) adopted by Neath Port Talbot County Council is of relevance to the proposed development:

- Planning Obligations (October 2016)
- Parking Standards (July 2017)
- Affordable Housing (October 2016)
- Biodiversity and Geodiversity (May 2018)
- Pollution (October 2016)
- Open Space & Greenspace (July 2017)
- Renewable and Low Carbon Energy (July 2017)
- Design (July 2017)

Appraisal

Overview

- 6.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.
- 6.2 The key material planning considerations are as follows:
- The Principle of Development;
 - Visual and Residential Amenity;
 - Parking and Highways; and
 - Other Material Considerations

The Principle of Development

- 6.3 The proposed development site is located within settlement limits. As defined in the LDP by Policy SC1 (Settlement Limits), sustainable new development that is proportionate in scale and form to the role and function of the settlement will be acceptable in principle. Moreover, the site is allocated for housing as under Policy H1/2* of the LDP. It's considered that in principle, the proposal is accepted subject to compliance with local policy and material considerations, as outlined in the following sections. This is echoed in the pre-application responses provided by the LPA in 2023 and 2025 on the proposed scheme.
- 6.4 Policy SP7 (Housing Requirement) outlines the need to deliver 8,760 additional homes across the County to meet the projected level of future population growth. The proposal concerns the development of a greenfield parcel of land to provide an additional 250 dwellings, which will contribute to the County's housing supply. The proposed development is therefore considered to accord with Policy SP7.
- 6.5 Policy SP8 (Affordable Housing) states that a key function of the LDP is to cater for Neath Port Talbot's housing requirement through an appropriate supply and mix of housing tenures in order to provide an affordable and acceptable standard of housing for all groups in society in accordance with Welsh Government policy. Meeting affordable housing need is a fundamental element of the strategy, and provision has been made within the LDP to deliver an additional 1,200 affordable dwellings within the County across the LDP period. Sources such as the Mid and South West Wales Housing Assessment summary for Neath Port Talbot identify a particular need for 1 and 2 bedroom units within the Authority which will be delivered as part of this proposal.
- 6.6 The proposal seeks to provide 250 new dwellings on a greenfield site, with one third of these being affordable in nature in order to comply with LDP Policy AH1 (Affordable Housing). As the site is located within the Neath Coastal Corridor Strategy Area, a minimum of 25% of the units are required to be affordable to be policy compliant. On this basis, the proposal complies with Policy SP8 and AH1 of the Local Development Plan. In addition to affordable homes, shared ownership and private market units will be provided to ensure a well-balanced community as part of the development.
- 6.7 To add further weight to the argument for the delivery of affordable homes as part of the proposal, recent data published by the Home Builders Federation (HBF) indicates that an estimated 110,000 new homes are required between 2019 and 2039 to address housing needs in Wales. This figure included the goal of delivering 7,400 additional homes being delivered annually between 2019/20 – 2023/24, although only 5,300 were built annually during that period. In light of the failure to meet annual targets, there is already a backlog of almost 11,000 homes against the targets set out in Future Wales.

- 6.8 The LDP identifies the site within the Coastal Corridor Strategy as part of LDP Policy SP5 (Development in the Coastal Corridor Strategy), therefore a development density of 35 dwellings per hectare is required. The site is approximately 11.79 hectares with 250 residential dwellings proposed. This equates to a gross density of 21.2 dwellings per hectare. Taking into account the site's topography, existing green infrastructure, requirement for providing open space, highways and incorporation of SuDS features, the developable area is substantially reduced. As a result of this, the net density of the site is considered to be much closer to the required 35 dwellings per hectare specified under Policy BE1 (Design).
- 6.9 The site is located in a sustainable location, and its development is considered to produce a mix of residential homes which will create a vibrant community with its own local distinctiveness and sense of place in line with principles established within LDP Policies SP1 (Climate Change), SP3 (Sustainable Communities), SP5 (Development in the Coastal Corridor Strategy Area), SP7 (Housing Requirement), SP8 (Affordable Housing), SC1 (Settlement Limits), H1/2 (Leiros Park Extension), AH1 (Affordable Housing) and BE1 (Design) in addition to the Affordable Housing Supplementary Planning Guidance and Technical Advice Note 2 (Planning and Affordable Housing).
- 6.10 In light of the above, the principle of developing the site for the purpose proposed is established. As confirmed under subsequent headings, it will not give rise to any significant adverse impacts upon visual and residential amenity, highway safety and several other material considerations whilst providing a valuable contribution to the area's housing land supply requirements.

Visual and Residential Amenity

- 6.11 Policy BE1 (Design) of the LDP relates to high-quality design, supporting development proposals that fully take in to account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.
- 6.12 Aforementioned, the development prioritises design, aiming to preserve the character of the surrounding residential context while also creating a new neighbourhood, with its own sense of place. The proposed material palette referenced within the Design and Access Statement have been carefully considered in order to harmonise with the surrounding built form and appearance of properties. The use of render, stone and brick is based upon the existing architectural features in the area.
- 6.13 The site lies within a predominantly residential area. The development will result in a proposal of a commensurate scale as a result of the surrounding properties being two storeys high. It is evident that the residential use is fully compatible with surrounding land use, which due to its modest scale would not lead to any unacceptable harm upon the living conditions of the occupants of adjacent properties.
- 6.14 The proposals will serve as a continuation of the residential context of Bryncoch, which sits to the south and west of the site. The proposed development has been laid out to mimic the orientation of the existing properties with dwellings fronting onto the highway and in cul-de-sacs. The proposal has ample green infrastructure running throughout with existing green infrastructure features being retained where possible, along with open space and footpaths/active travel route being introduced. The layout retains a significant band of trees and open space along the southern portion of the site which provides screening for the existing properties. Furthermore, the tree lines of the northeast, and eastern boundaries are to be retained. New woodland is proposed in the northwestern corner of the site, acting as a form of biodiversity enhancement. It is considered that the proposal offers a logical continuation of residential development from the existing properties at Bryncoch which will result in development of the housing allocation being in keeping with the character and appearance of existing built development.

- 6.15 In terms of residential amenity, the siting and layout of the application site has been carefully considered in order to minimise the impacts of the proposed development, in conjunction with the topography and existing green infrastructure. The layout has been designed and orientated to ensure there is no detrimental impact towards the privacy and amenity of existing and proposed residential dwellings.
- 6.16 The overall scale of the proposal is controlled by the majority of dwellings being two storeys high. Furthermore, the proposed dwellings are set back from the site boundary, increasing distance from green infrastructure and the existing housing. Consequently, the proposal will neither unacceptably overbear or overshadow existing properties in close proximity to the site.
- 6.17 In summary, the proposal is considered acceptable from a design and placemaking perspective by positively contributing to the appearance of the area. The addition of new, well-designed homes would result in a positive impact upon the character of the area and would enhance connections with the existing community whilst having no detrimental impact upon the living conditions of existing or future residents. Being integrated within an existing community, the proposal has been carefully considered in terms of its effect upon existing resident in terms of residential amenity. The proposals to deliver a substantial amount of affordable housing will make an important contribution to the delivery of affordable homes within the Local Authority. Having considered the above, the proposal is deemed to be in accordance with LDP Policy BE1 (Design) and TAN 12 (Design).

Parking and Highway Safety

- 6.18 The application site is well positioned north of Neath Town Centre, being located near to the A473 and A465, and within walking distance of facilities and services. The site lies in proximity to bus services and is only 1.5km from Neath Railway Station. Moreover, there are several local cycle and walking routes in close proximity which offer local connectivity and serve as links to National Cycle Route 47. The site therefore has excellent sustainability credentials with numerous opportunities in terms of both utilising public transport and promoting active travel.
- 6.19 Aforementioned, two access strategies were presented as part of the pre-application discussions and it was subsequently decided that option 2 would be the more favourable. This option supports a one road access strategy, meaning only Daphne Road will be used as the point of access for vehicular traffic. This will also provide a point of access for pedestrians and cyclists, however, an additional emergency access and active travel only link will be provided via Leiros Park Drive, linking with the proposed bus loop within the site.
- 6.20 The internal layout of the proposed development has been designed with sufficient width and geometry to accommodate bus movement, with buses able to enter and exit the site via Daphne Road. Typically, secondary streets will reduce to 5.5m with occasional street narrowing or introduction of green infrastructure to help slow vehicle speeds and enhance the street scene. Moreover, parking is typically proposed on plot and provided in accordance with the Parking Standards SPG.
- 6.21 In order to promote sustainable travel at the site, a Travel Plan has been prepared which seeks to reduce the reliance on cars and promote alternative transport choices. A series of measures have been proposed including providing a welcome pack, providing cycle parking facilities, and the promotion of local services. A condition will be imposed to ensure adherence to the approved Travel Plan.
- 6.22 A Transport Assessment accompanying the application states that a review of the local highway network has demonstrated that the traffic associated with the development will have little noticeable impact on the functioning of the junctions assessed. Where the local highway network experiences theoretical capacity issues in the baseline situations, the addition of traffic from the development only results in a minor

worsening of performance although the level of change is unlikely to be precisely replicated within modelling information due to the instability of modelling junctions which are at capacity. Due to the currently policy stance on active travel and public transport, it is not deemed appropriate in this case to mitigate the small traffic impact caused by the development or seek to address the pre-existing issues. Such an approach is also not considered to be in accordance with the Welsh Government Transport Policy.

- 6.23 In addition to the above, percentage impact assessments of the change in traffic volumes assigning to the junctions in the study area forecast to result from the proposal have been undertaken and reveal that beyond those highway links providing direct access to the application site, the level of impact is considered to be low. In reviewing drone footage provided in April 2026, there appear to be network constraints to the west of the western roundabout on Neath Abbey Road resulting in blocking issues. The queuing south-west bound traffic along Cadoxton Road restricts vehicles from existing the roundabout in this direction. This takes place during the AM peak period and is considered to be a consequence of upstream junction restrictions. It is not considered appropriate to attempt to mitigate the small traffic impact of the development or seek to ease the pre-existing issues which have existed on the network for many years.
- 6.24 In summary, the development proposed on an allocated site is appropriate and acceptable in traffic and transport terms. It is considered that the traffic movements associated with the development proposals could be accommodated on the highway network and will not have a significant detrimental impact on the conditions already experienced on the local highway network due to the existing volumes of traffic using the network and predicted growth in future traffic volumes.
- 6.25 On this basis, it's considered that the proposed in in alignment with Policies SP20 (Transport Network) and TR2 (Design and Access of New Development) as well as the adopted Parking Standards SPG (July 2017). The pre-application response in relation to the proposed scheme confirmed that from a Highways perspective, the principle of development is considered acceptable.

Other Material Considerations

Landscape and Green Infrastructure

- 6.26 A key aspect of the proposal is ensuring that adequate landscaping and green infrastructure elements are incorporated into the development. The Green Infrastructure Strategy prepared by Tir Collective shows that a number of existing trees are to be retained as part of the proposal. In addition to this, it is proposed to plant trees, scrub and hedgerow along with the introduction of amenity grassland, landscape based play spaces and a disaggregated LEAP. Although some of the site's green infrastructure features are to be lost, the overarching landscape masterplan provides ample enhancements that will improve the biodiversity value and visual amenity of the site.
- 6.27 A Green Infrastructure Statement is provided confirming that the development demonstrates net benefit for biodiversity and has followed the stepwise approach set out in Chapter 6 of Planning Policy Wales Edition 12. The implementation of the landscape design will result in a network of healthy and multifunctional green spaces providing a range of environmental benefits for wildlife and people.
- 6.28 Tir Collective has prepared a Landscape and Visual Impact Assessment (LVIA) in order to assess the impact of the proposed development on the landscape of the site and its context. The landscape and visual assessments concluded there would be some minor and moderate adverse impacts. The proposal would result in an expansion of the footprint of the settlement, however the existing built development within the settlement of Bryncoch surrounds the site. Elements contributing towards the distinctive character of the site including the sloping landform and mature field boundaries would be preserved and utilised as part of the development which includes public open spaces.

- 6.29 The pattern of the new development would replicate the existing land fabric. The development would be viewed alongside the existing dwellings within Rhydding and would integrate into the area courtesy of the materials utilised and their building type. The Hillside Park along with retention of green infrastructure features including hedgerow and mature trees will assist with visually breaking up development blocks. In summary, the proposed residential development is considered appropriate and wouldn't have an unacceptable landscape character or visual amenity impact upon its immediate setting or the wider landscape.
- 6.30 In terms of Policy BE1 (Design), the proposal adheres to the following point "*It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate*". The materials proposed for the build will be locally sourced, and a substantial amount of landscaping will be incorporated into the development in order to mitigate its impact. Moreover, the green infrastructure proposals are also considered to be in accordance with the recently updated Chapter 6 of Planning Policy Wales Edition 12.

Biodiversity and Trees

- 6.31 An Arboricultural Report has been produced by ArbTS that includes Tree Survey Data, a Tree Constraints Plan, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement. The site contains 29 Category A trees/tree groups and 1 area of woodland, 76 Category B trees/tree groups/hedgerow, 95 Category C trees/tree groups/hedgerow and 10 Category U trees. 54 trees are to be removed in total (25 individual trees, 29 trees within tree groups and 20 metres of hedgerow), with 87% of these being low or poor quality trees. The removal of the moderate quality trees can be mitigated by suitable compensatory tree planting and practical woodland management. The Tree Protection Plan has been provided to illustrate how to facilitate construction of the development.
- 6.32 Detailed ecological assessments of the site were undertaken by EDP comprising a desk study, Extended Phase 1 Habitat Survey, botanical assessment and further detailed surveys with respect to bats, breeding bird, badger (*Meles meles*), dormouse (*Muscardinus avellanarius*) otter (*Lutra lutra*) and water vole (*Arvicola amphibius*). This was followed up by an Extended Phase I habitat survey of the site in March 2026, in addition to further roosting bats, breeding birds and badger surveys.
- 6.33 No part of the site is covered by any statutory or non-statutory designations. There are several such designations within the potential zone of influence, which includes Crymlyn Bog Ramsar Site and Special Area of Conservation (SAC), the Tennant Canal Site of Importance for Nature Conservation (SINC), Catwg Wetland SINC, Neath Estuary SINC and Neath Canal SINC. In addition, Ancient Semi-natural Woodland (ASNW) lies directly adjacent to the eastern boundary of the site.
- 6.34 With respect to habitats, the site is characterised by five agricultural grassland fields subdivided by mature tree lines with a sixth field within the south-eastern corner of the site dominated by dense scrub. It is considered that the said habitats are considered to be of negligible site-level importance, although the field located at the north-west corner is considered to be of local level importance given its relatively greater botanical diversity. The eastern boundary of the site is defined by broadleaved woodland and ASNW, whilst the southern boundary is delineated by a linear band of dense scrub, woodland and scattered mature/semi-mature trees through which flows a small stream. Such features are judged to be of Local-County level importance and are priority habitats for Wales, especially the ASNW, which is considered as an irreplaceable habitat and is protected under the Planning Policy Wales.
- 6.35 In terms of the species, the habitats supported by the site are of value for a breeding bird and bat assemblage of local level importance and also provide suitable habitat for badger, common reptiles, amphibians and hedgehog.

- 6.36 EDP have provided measures for the avoidance, mitigation and compensation where possible to preserve features with the site and to allow creation of new habitats to compensate for proposed losses. Due to the scale of the development and the proposed mitigation measures in terms of habitats and protected/notable species, the scheme is compliant with wildlife legislation and planning policy for conservation whilst also delivering benefits to biodiversity.
- 6.37 In summary, the proposal is acceptable from a biodiversity and arboriculture perspective and accords with LDP Policies SP15 (Biodiversity and Geodiversity) and EN7 (Important Natural Features), the Biodiversity and Geodiversity Supplementary Planning Guidance, along with Technical Advice Note 5 (Nature Conservation and Planning).

Coal Mining and Contamination

- 6.38 A range of site investigative works have been carried out for the site comprising:
- Coal Mining Risk Assessment – April 2017;
 - Site Investigation - June 2017;
 - Geotechnical Appraisal – August 2020; and
 - Intrusive Coal Mining Risk Assessment – September 2020; and
- 6.39 Remedial measures will be required with regards to site soils which have been found to contain elevated levels of arsenic. The affected soils are the shallow surface soils that cover the entire site. The proposed remediation for the site comprises capping that is to consist of the proposed buildings, hard standing and garden and landscaped areas with 600mm of suitable clean imported subsoil/topsoil material.
- 6.40 In relation to coal, The Mountain coal seam was encountered. It is recommended that further probeholes are sunk at the far north of the site to identify whether or not there are shallow workings associated with The Mountain coal seam. At the unnamed coal seam it is considered that the risk to the site from shallow workings in the unnamed thin coal seam is negligible and that no further risk assessment is warranted. At the Garlant coal seam the risk to the site from shallow workings is negligible and no further assessment is warranted. No evidence of either shaft was encountered during the trial trenching. It is therefore considered that either the shafts do not exist, or they are located elsewhere on site. As such further investigative works are being undertaken.
- 6.41 Percolation testing identified that generally the strata consists of silty gravel and the underlying rock head provide a relatively high soil infiltration rate which is anticipated will be sufficient to use within soakaway drainage, however the strata in localised areas was found to have significantly lower infiltration rates that is unlikely to support the use of such drainage solutions, i.e. in the areas of TP2, TP7, TP12 and TH13. In summary, the level of site investigation undertaken indicates that contamination can be readily mitigated for.

Drainage and Flood Risk

- 6.42 Regulation, adopted on the 7th January 2019, requires all new developments of more than 1 dwelling house or where construction area is 100m² or more to submit a Sustainable Drainage Systems (SuDS) application demonstrating compliance with the statutory SuDs standards for the design, construction, operation and maintenance of surface water drainage systems serving new developments. It is noted that the drainage strategy for foul and surface water will be developed with regard to Schedule 3 of the Flood and Water Management Act 2010 and will therefore require a separate drainage consent from the Council's SAB Authority.

- 6.43 This application is accompanied by a Drainage Strategy Note clarifying the foul and surface water drainage arrangements. In respect of foul drainage, a new Welsh Water foul drainage system will serve the proposal subject to a Section 104 adoption approval. Due to the scale of the proposals, the scheme will connect into the public sewer at two or three separate points. The majority of the development will discharge to the public sewer in Leiros Parc Drive.
- 6.44 The surface water strategy aims to replicate the natural catchment process as closely as possible, and will be in accordance with SuDS standards. Several raingardens are proposed across the site serving the adoptable road, with surface water reused through the hydration of planting. Moreover, water butts and raingardens will be provided for each residential property that will collect roof run-off for private non-potable use.
- 6.45 Based on the site investigation undertaken to date, the majority of the site is suitable for an infiltration surface water disposal solution with localised areas around the southern end of the site needing a positive offsite connection. Additional infiltration testing is recommended at the proposed formation level of the SuDS system as a result of the extensive cut and fill exercise required. Where infiltration is not possible or connection via gravity into the existing watercourse isn't feasible, a connection into the highway system in Leiros Parc Drive and Daphne Road will be required at an attenuated rate. An updated HMA is required for the mains water supply serving the development. Ongoing discussions are currently taking place between the applicant and Welsh Water concerning the HMA. Subject to all other assessments being acceptable, Welsh Water have confirmed they would look to impose a condition to any future planning permission which would allow the LPA to move forward with granting a planning permission whilst the HMA is being developed and details of the agreed scheme could then be submitted via condition.
- 6.46 In terms of flood risk, the site does not sit within the most vulnerable zone, however a section along its south-western boundary is prone to surface water flooding. The proposed flood risk has been dealt with as part of the drainage strategy which has been prepared.
- 6.47 Having considered the above, the proposal aligns with the following point of Policy BE1 (Design): "*9. Its drainage systems are designed to limit surface water run-off and food risk and prevent pollution*". Sustainable Urban Drainage Systems are being implemented as part of the scheme, which is advised as part of the policy under paragraph 5.5.13 of the LDP. Furthermore, the flood risk along the southern boundary will be dealt with via a comprehensive drainage strategy.

Archaeology

- 6.48 In April 2016 and updated in 2026, Archaeology Wales carried out an Archaeological Desk-Based Assessment and site visit to determine the archaeological potential of the site. The assessment confirms that no Scheduled Ancient Monument, Listed Building, registered Historic Landscape, Conservation Area or listed Historic Park and Garden will be directly affected by the proposed development.
- 6.49 The site will have a minor indirect (visual) impact on The Gnoll, a Grade II* listed parkland, due to the partial visibility of the proposed development from viewpoints within the parkland. The site will also have a negligible indirect (visual) impact on four Scheduled Ancient Monuments due to distant and restricted views of the proposed development. The site will also have a negligible indirect (visual) impact on six Listed Buildings, again due to distant and partial views of the proposed development. The site is also considered to have a negligible indirect (visual) impact on Neath Town Centre Conservation Area, due to views across the Conservation Area from within the proposed development area, and slight alterations to the urban setting of this area.

- 6.50 The site lies within the Landmap historic landscape areas of Bryncoch Cilybebyll (NPTHL040), Neath Port Talbot Urban Corridor (NPTHL054) and Dulais Valley SW (NPTHL074). The development will have a minor direct and indirect (visual) impact on Bryncoch Cilybebyll by altering part of the enclosed farmland and introducing an urban element to this landscape. The development will have a negligible direct and indirect (visual) impact on the remaining Landmap historic landscape areas as it will not impact on any significant characteristic elements of these landscapes.
- 6.51 Research highlights eight sites of archaeological interest within the proposed development area, along with a general potential for later post-medieval industrial activity. The former Rhydding Farmstead is recorded both as post-medieval house and farmstead (PRN 2630w), and the potential site of a medieval monastic grange (PRN 5278w). Rhydding Canal (LPN01), an early 19th century canal associated with George Tennant, forms the southwestern boundary of the site, and a post-medieval gravel pit (LPN02), the site of a post-medieval barn (LPN03), a post-medieval tramway/trackway (LPN04), possible outlying features associated with a post-medieval farmstead and colliery (LPN05) and terraced platforms within the upper valley slope (LPN06), all lie within the bounds of the proposed development and may potentially be directly affected by development works.
- 6.52 It is recommended that a buffer zone be maintained around the site of Rhydding Canal (LPN01) to ensure preservation in situ. Recording work, such as a photographic survey, is recommended on any upstanding remains of Rhydding Farmstead (PRN 2630w) prior to development, and an archaeological watching brief is recommended for any groundworks within and around the site of the former farmstead to record any below-ground remains associated with the farmstead and potentially with any remains associated with the medieval grange (PRN 5278w). A further archaeological watching brief on development works that affect the remaining archaeological sites is also considered to be appropriate mitigation to ensure their preservation through record. It is further recommended that the public rights of way be maintained with an appropriate buffer zone to ensure continued visibility from within the area, as recommended in the LDP Strategic Housing Site Assessment Report.

Energy

- 6.53 Codi have provided details of their decarbonisation strategy to support this application. The focus of the strategy is on reducing construction impacts and operational energy through a number of measures including utilising locally sourced materials, implementing a fabric first approach, incorporation of PV panels and the use of innovative offsite construction methods. As a result of implementing the above measures, the proposal would accord with LDP Policy RE2 (Renewable and Low Carbon Energy in New Development) and the Renewable and Low Carbon Energy Supplementary Planning Guidance.

Noise

- 6.54 Due to the site's proximity to Gilfach Quarry, a Noise Assessment has been undertaken by Acoustic Consultants. Prior to undertaking the noise survey at the application site, attempts were made to contact the quarry operator but they didn't respond and no blasting information could be sourced online. An attended portion of the site survey for circa 4 hours revealed that the operational noise from the quarry wasn't audible at the nearest boundary edge. No blasting noise was detected during the entire survey.
- 6.55 Based upon the measured noise levels, the site falls into NEC B of TAN11 (Noise). With the proposed noise control measures being applied to the scheme, the aims of TAN11 and PPW12 will be achieved and acceptable internal condition met. Moreover, noise levels in amenity spaces are to fall within the BS8233 criteria. In summary, the proposed development of the site is acceptable from a noise perspective and therefore accords with LDP Policy EN8 (Pollution and Land Stability), TAN11 (Noise) and PPW12.

- 6.56 In terms of construction noise, it is accepted that there will be some disruption from works however this would be temporary in nature. Furthermore, no construction would take place during unsociable hours. A Construction Environmental Management Plan will be produced by the contractor prior to works commencing to ensure matters such as noise are dealt with. It is not considered that the scheme would generate an unacceptable noise despite the increased traffic associated with the development.

Waste

- 6.57 Policy W3 (Waste Management in Development) requests details of waste management during the construction phase and occupation. Site Waste Management Plans are required for developments of 50 or more dwellings. In terms of post-occupation waste, the details of bin store locations will be provided with the reserved matters layout. A framework waste management plan has been submitted to support the application, which can be safeguarded through the imposition of an appropriately worded planning condition.

Lighting

- 6.58 In respect of external lighting, no details have yet been provided. The applicant is satisfied with a condition being imposed dealing with any lighting to be installed as part of the development. Any construction lighting will be covered off under the Construction Environmental Management Plan.

Section 106 Contributions

- 6.59 LDP Policy SP4 (Infrastructure) states that *"Development will be expected to make efficient use of existing infrastructure and where required make adequate provision for new infrastructure, ensuring that there are no detrimental effects on the area and community. Where necessary, Planning Obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable"*.
- 6.60 LDP Policy I1 (Infrastructure Requirements) sets out that additional funding or works may be necessary to mitigate the impact of new development. These requirements include consideration and suitable provision for several matters including affordable housing, open space, active travel and education.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Codi Group in relation to the proposed outline planning application (with all matters reserved except for access) for the construction of up to 250 residential dwellings, public open space, green infrastructure, a small flexible mixed-use/community space, sustainable drainage features, access arrangements, and all associated landscaping and infrastructure works at land at Leiros Parc, Bryncoch, Neath.
- 7.2 The site is a housing land allocation (Reference: Policy H1/2) in the adopted Neath Port Talbot County Borough Council Local Development Plan with the planning application addressing the specific considerations highlighted during the site selection process, including landscape impact and transportation issues. A suite of supporting documentation accompanies this application that demonstrates the site's suitability for residential development of this scale, which will form a major contribution to the authority's housing stock.
- 7.3 The scheme design has been developed following detailed pre-application discussions with the local planning authority in 2025. The discussions at pre-application stage have been referenced within this document and demonstrates that the scheme presented aims to align with the aspirations of the LPA. Several technical reports have been produced to accompany the application which address topic specific issues which are relevant to the proposal. Matters relating to highways, ecology, drainage and green infrastructure have all been considered as part of the proposal.
- 7.4 Material considerations include PPW12, Building Better Places, TANs and SPG, all of which support the development, as set out above. The content of this statement has demonstrated how the scheme can be seen to comply with prevailing national planning policy, guidance and legislation. This includes compliance with requirements of Planning Policy Wales Edition 12, the inclusion of Sustainable Drainage Systems (SuDS) features that comply with national standards (The Flood and Water Management Act 2010 (Schedule 3)) and compliance with Building Better Places - The Planning System Delivering Resilient and Brighter Futures. The statement has also set out the material considerations considered as part of the proposal, demonstrating the positive weight of those material considerations.
- 7.5 As such, it is concluded that the proposal fully accords with both national and local policies. Substantial weight should be afforded in favour of the proposal given it will deliver a much needed housing development within Neath Port Talbot. Furthermore, there are no material considerations which would prevent the planning application from being determined in accordance with the relevant planning policy framework. In this respect, it is respectfully requested that the Local Planning Authority consider this planning application favourably and grant planning permission for the proposed development.