

PLANNING STATEMENT

No's 8-12 (even) Queen Street, Neath

August 26



Summary

Proposal

Proposed demolition of existing buildings and construction of mixed-use development comprising ground floor retail / commercial use (A1, A2, A3 or D2 use) with upper levels of residential and associated works

Location

No's 8-12 (even) Queen Street, Neath, SA11 1DL

Date

August 26

Project Reference

25.162

Client

Cardiff Building Company

Product of

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Report Revision No.

Revision A

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Introduction

- 1.1 Asbri Planning is appointed as planning agent to Cardiff Building Company to prepare this Planning Statement to accompany the proposed demolition of existing buildings and construction of mixed-use development consisting of a proposed 4 storey building comprising ground floor retail (A1 use) with upper levels of residential and associated works at no's 8-12 (even) Queen Street, Neath, SA11 1DL.
- 1.2 The proposals will provide regeneration to Neath Town Centre by introducing a modern and contemporary multi-use building along an existing shopping street. The scheme will also contribute towards the area's housing needs, as well as providing 25% affordable housing. Overall, the development will provide a new landmark building within the heart of Queen Street, providing a positive experience for passing shoppers and residents.
- 1.3 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 by Hammond Architectural Ltd to accompany the application:

Drawing name	Drawing reference
Site Location Plan	SK 00 SITE LOC PLAN
Proposed Ground Floor Plan	P07-PR-GF-PLN
Proposed First Floor Plan	P08-PR-1F-PLN
Proposed Second Floor Plan	P09-PR-2F-PLN
Proposed Third Floor Plan	P10-PR-3F-PLN
Proposed Roof Plan	P11-PR-RF-PLN
Proposed Front Elevations (Queen Street)	P12-PR-FRONT-ELE
Proposed Front Elevations	P13-PR-REAR-ELE
Proposed Rear Elevations	P14-PR-REAR-ELE
Proposed Internal Courtyard Elevations (01)	P15-PR-COURT-ELE
Proposed Internal Courtyard Elevations (02)	P16-PR-COURT-ELE
Proposed Typical Long Sections	P17-PR-TYP-SEC
Proposed Indicative Streetscenes	P18-PR-IND-PER
Vision Splay Ground Floor	P19-PR-VSP-PLN
Proposed South East Elevations	P20-PR-TYP-ELE
Proposed Block Plan	P21-PR-BF-PLAN-PLNG
Drainage Layout	2806-PHG-XX-XX-DR-C-0001
Soft Landscape Design	835-STO-00-00-DR-L-0001
Soft Landscape Details	835-STO-00-00-DR-L-0002

1.4 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application forms (1APP)	Asbri Planning
Planning Statement	
Energy Statement	
Sustainability Statement	
PAC Report	
Design and Access Statement	Hammond Architectural Ltd
Bat Survey	Ecological Services
Drainage Strategy Report V1	PHG Consulting Engineers
Green Infrastructure Statement	Stiwdio Owens Landscape Architecture
Flood Consequence Assessment	Brookbanks

1.5 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

The site

- 2.1 The site comprises brownfield land contained within Neath Town Centre, which include three mid-terrace commercial buildings which form no's 8-12 (even) Queen Street. No. 10 Queen Street currently lies vacant whereas number's 8 and 12 are currently occupied for ground floor retail (Coco Blush Boutique and Fine China). The properties have an active frontage onto Queen Street, and extend in a south westerly direction towards Queen Street Back Lane. The site falls on the following National Grid Reference: SS 7526 9749.



Figure 1: Site Location

Site Description

- 2.2 The buildings date back to in excess of 60 years and are situated within an urban environment. The buildings are both rendered and two storeys in height. 12 Queen Street has a pitched slate roof with a single brick chimney and areas of timber fasciae but no soffits. 10 Queen Street has a flat roof with areas of timber cladding. 8 Queen Street is attached to the existing Peacocks building, consisting of similar materials as no. 12, having a slightly lower roof height. The buildings have a slightly weathered appearance, particularly towards the rear of the properties along Queen Street Back Road. The 3 buildings have a combined area of approx. 711m².

Context Analysis

- 2.3 The buildings are situated in an urban environment along the commercial street of Queen Street in the town of Neath, comprising of numerous shops, cafes, and services. The Town Centre contains multiple features of importance including the general market, public buildings, the castle and Street Thomas church. The site is also located within Neath Town Centre Conservation Area, according to the LDP's Proposal Map.
- 2.4 Neath Bus Station lies at the southern end of Queen Street by Victoria Gardens and is served on a frequent basis. Services head to several destinations including Swansea, Skewen, Margam, Pontardawe and Brecon. Neath Train Station is located 0.1 miles from the site. Hourly services are operated by Great Western Railway traveling between Swansea and London Paddington in both directions. Transport for Wales services also call at the station, with their services terminating at destinations including Manchester Piccadilly, Cardiff Central, Carmarthen and Milford Haven. National Cycle Route 47 runs parallel to Neath Canal and can be accessed in close proximity to the site. The route itself is 121 miles long and stretches

from Newport to Fishguard and forms part of the Celtic Trail West. There are no public rights of way contained within or in close proximity to the site.



Figure 2: Site photo along Queen Street

Planning History

- 2.5 A review of Neath Port Talbot Council's planning search reveals the following planning history at the site:

Planning Reference	Proposal	Decision
P2015/0707	Change of Use from Offices to Pool Hall	Approved 29 th September 2015
P2008/0031	Installation of new shop front, air conditioning and erection of satellite dishes and aerial	Approved 15 th May 2008
P2008/0009	Fascia and projecting advertisement signs	Approved 25 th March 2008
P2007/1404	Change of use from restricted A2 use of bank/building society to open A2 use	Approved 20 th November 2007
P2004/1444	Fascia and projecting sign	Approved 23 rd November 2004
P1996/1627	Fascia sign and projecting sign	Approved 12 th December 1996
P1996/1578	Refurbishment of existing branch premises, including installation of new shopfront	Approved 12 th November 1996
N1991/0533	Installation of automatic teller machine	Approved 1 st November 1991
N1988/0965	Replacement of shop front sign	Approved 18 th January 1989
N1986/0498	Section 53 extension	Permitted development 2 nd September 1986
N1980/0026	Non illuminated fascia sign	Approved 26 th February 1980

N1979/0598	Conversion of existing unused floor space to printing processes	Approved 27 th November 1979
N1977/0303	New shop front	Approved 31 st August 1977
N1977/0291	Fascia sign projecting sign and internal illuminated sign	Approved 17 th September 1977
N1977/0206	Change of use building society branch office	Approved 28 th June 1977

Highways

- 2.6 The site is less than a mile away from the Heads of the Valleys Road (A465), a trunk road running from Junction 43 of the M4 at Llandarcy to Bromyard in Herefordshire. It is 66 miles in total and connects settlements including Neath, Abergavenny, Merthyr Tydfil and Hereford. Junction 43 of the M4 is an eight-minute drive away, which offers access to several destinations within South Wales and across the border in England. There are no parking facilities associated with the site.

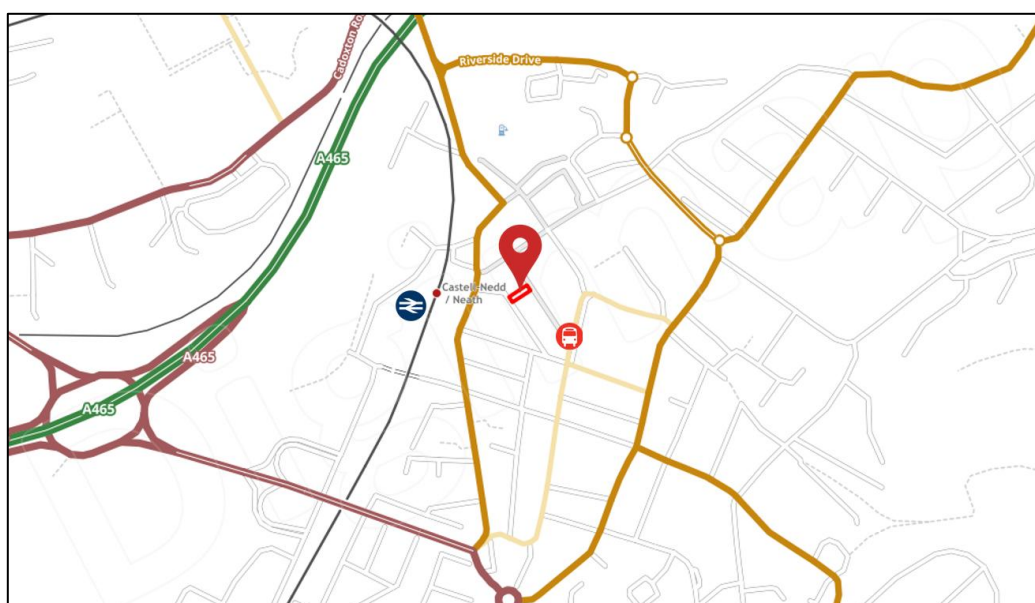


Figure 2: Neath Town Local Highway Network

- 2.7 Vehicles can access the site along Queen Street Back Road, towards the rear of the site, and there are numerous car parks which are within walking distance of Queen Street. The site frontage can only be accessed by pedestrians along Queen Street, via Orchard and Green Street.

Site Boundaries

- 2.8 The site is bounded by other commercial properties along the street, such as Peacocks to the north, American Candy Store/Neath Goldsmiths to the south, and a large M&S store directly opposite. To the rear, an un-used multi-storey car park and a block of flats (Victoria House) are seen along the backstreet to the west.

Public Right of Way

- 2.9 There are no known public rights of way routes which pass through or next to the site. The nearest PROW can be seen 560m east along Gnoll Dr, which is a designated footpath (ref: 42/MO.ANC.21/2).

- 2.10 The site has access to numerous footways and parks within the town centre. Victoria Gardens to the east of Queen Street offers many walkways, benches and additional greenspace for local residents and visitors, as well as being a hub for public transport. There is also a National Cycle Network Route (no. 47) along Canal Road which runs through the majority of Neath Town Centre.

Historic Environment

- 2.11 The Cadw Map reveals there are no designated historic assets contained within the site. Almost immediately opposite the site there is a Grade II listed building at no. 9 Queen Street (Cadw Ref.11820). The DS Morgan property is an early mid-19th century shop that has been designated as it is a surviving example of 19th century Queen Street shops. Victoria Gardens lies south east of the site, which is classified as a Grade II registered historic park and garden.

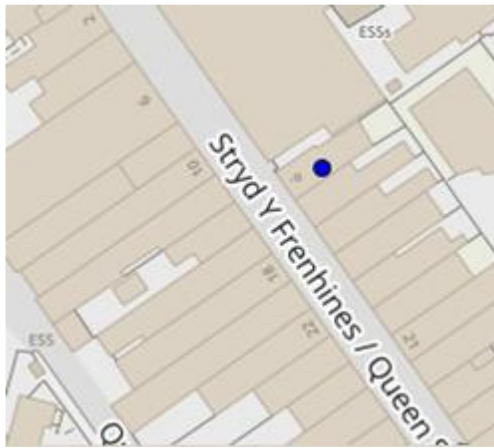


Figure 3: Cadw Historic Records Map



Figure 4: Grade II Listed Building (no. 9 QS)

Flood Risk

- 2.12 Within the NRW Flood Map for Planning, the site lies entirely within flood zone 3 for river and sea flooding, and is also located within flood zones 2 and 3 for surface water and small watercourse flooding.



Figure 5: NRW Flood Map for Planning (NRW)

- 2.13 As the site falls within flood zone 3, a Flood Consequence Assessment has been produced to accompany this application in line with the TAN 15 regulations. TAN 15 states that planning applications in Flood Zone 3 require the strongest justification and proposals will only be appropriate if they are essential to the Development Plan Strategy to regenerate an existing settlement or achieve key economic or environmental objectives.

Local Development Plan

- 2.14 A review of the Neath Port Talbot LDP Proposals Maps shows the following land allocations/policies within and around the site.



Figure 6: Neath Port Talbot LDP Proposals Map

- 2.15 Firstly, the site falls within the Settlement Limit (SC1) where development that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle. The Policy also states that developments of more than a few dwellings or uses that will attract or accommodate significant numbers of people are only likely to be acceptable in larger centres or towns where there are adequate facilities and transport infrastructure. The proposal intends to supply flats above ground floor retail within Neath Town Centre which satisfies these requirements.
- 2.16 The site falls within the Neath Town Centre District (Policy R2/1) which requires development to enhance the vitality, viability and attractiveness of Neath Town Centre and for proposals to integrate with and strengthen the layout, retail character and pedestrian flows. The development also lies on Primary Shopping Street (R2/3 – Queen Street), providing Class A1 shops on the ground floor which complies with the designated Policy.
- 2.17 The site is also within one of the six designated Conservation Areas in the County Borough (SP21/4(c)) where development proposals will be dealt with in accordance with national policy and guidance, which includes additional controls on demolition set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. This ensures that the development accords with the needs to preserve or enhance the area's identified character, appearance and setting.
- 2.18 Additionally, there is a Housing Allocation area to the northeast of the site (H1/7 – Neath Town Centre Redevelopment). Introducing housing into the town centre area is a key aim of the LDP, and the proposed scheme will contribute towards projected requirement and also towards the 1,200 affordable housing units with Neath Port Talbot over the plan period (2011-2026). There is also a 'Quiet Area' within Victoria Gardens towards the east of the site (EN10/5) which protects areas from significant increases in noise or other impacts from development that would adversely affect these criteria. The site does not fall within the area and is unlikely to significantly change the town centre soundscape or effect the quiet location.

Proposals

Proposed demolition of existing buildings and construction of mixed-use development comprising ground floor retail / commercial use (A1, A2, A3 or D2 use) with upper levels of residential and associated works.

Amount

3.1 The proposal will include the following components within the development:

- 4 storey building
 - 18 apartments (12 x 1B 2P and 6 x 2B 3P Apartments)
 - 2 retail units (80m² and 150m²)
 - Resident courtyard with landscaping
- Undercroft car park
 - 2 disabled spaces
 - 2 EV charging spaces

Scale

3.2 It is proposed to demolish the existing buildings in order to allow the applicant to maximise the site's potential. On the ground floor, 2 retail units circa 150m² and 80m² in floorspace are proposed. The first, second and third floors of the development will contain four 1-bedroom and two 2-bedroom apartments per floor with high-quality design being used in order to match the surrounding area and respect the characteristics of Neath Town Centre Conservation Area. The overall site measures approx. 711m² which includes 2 x 4 storey apartment buildings separated by a resident courtyard (ground floor retail in front building facing onto Queen Street) and an undercroft parking area.

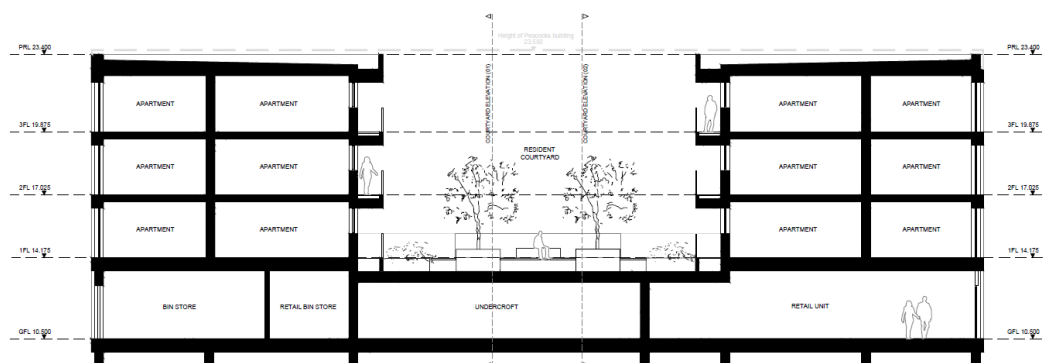


Figure 7: Proposed Long Section (Hammond Architectural Ltd)

Layout

3.3 The ground floor comprises 2 retail units facing out onto Queen Street towards the front, including staff provision (WC, staff room/kitchen etc.) and retail bin and bike storage. To the rear, there is an undercroft car park which accommodates 2 disabled spaces and 2 EV charging spaces. An internal bin store, plant area and bike store will also be provided.

3.4 As mentioned, the first, second and third floors will contain 6 apartments per floor, with the addition of an outside resident courtyard space within the central area of the first floor. The apartments nearest this space on the first, second and third floors will be provided with a balcony overlooking the courtyard. Indicative solar arrays are proposed to be installed on the roof, which will also slope slightly for rainwater to gather towards the inner gutter zones.

Appearance

- 3.5 The proposal will implement high-quality building materials and a contemporary design which respects and responds to the immediate buildings in terms of scale, setback and architectural character. The building height will be in line with those to the north of Queen Street (E.G. Peacocks, Nationwide) and the 'Sports Direct' building to the south to ensure that the proposal does not pose any significant shadowing impacts on neighbouring properties. The proposal aims to create a building which consists of modern architecture which accentuates the rich history of Neath Town Centre.
- 3.6 The proposed drawings show recessed areas and façade articulations to create a clean, crisp street elevation. As seen below, the building has a symmetrical composition, with the entrances recessed towards the far end of the ground floor. The large window panes maximise natural light into the apartments and enhance the views out into the adjacent streets. The architectural structure reinforces the existing urban grain and block structure through thoughtful infill placement.
- 3.7 The main principles were to maintain the active street frontage on Queen Street and enhance street frontage on Queen Street Back Road with transparent façades and clear entry points. The proposed development offers an opportunity to modernise and transform the visual appearance of the existing buildings to create a more positive streetscape, as expressed by the planning officer during the pre-application process.



Figure 8: Proposed Front and Rear Elevations (Hammond Architectural Ltd)

- 3.8 Slight changes have been made to the plans with respect to the earlier comments from the planning officer during the pre-application phase. The officer's comments stated that 'although there were no objections in principle to a modern interpretation as being evolutionary in Queen Street, the design approach to the proposed new build needed to better consider the existing Victorian and Georgian proportions, particularly in terms of legibility of each storey'. Recent design proposals ensure that the windows and symmetry match the existing street scene, and the external materials have been narrowed down to white façade and grey brick to blend with the existing street scene/no. 6 Queen Street. Positive officer discussions have taken place via meetings and pre-app, especially with the addition of no. 8 Queen Street now part of the proposal.

Access and Parking

- 3.9 Access to the residential apartments will be provided via two staircases that can be entered from Queen Street and Queen Street Back Lane respectively. Vehicle access will be provided via Queen Street Back Lane which will lead to undercroft car parking area containing 2 disabled spaces and 2 electric vehicle charging space.

Boundary Treatment & Landscaping

- 3.10 The site is bounded by no's 6 & 14 Queen Street either side. No. 6 will approx. be the same height as the proposed building, and no. 14 will be in line with the first-floor apartments.

- 3.11 Landscaping and ecological enhancements are key considerations in order for the proposal to comply with both local and national planning policy. The outside resident courtyard will include trees and planting which aims to integrate passive solar design, creating a private sanctuary for residents away from the hustle of Queen Street. The space will also include benches within the centre to encourage social cohesion and offer a place for residents to relax outdoors. The proposal also includes a green roof structure which will provide the required attenuation and reduce the volume discharged by encouraging evapotranspiration.

Sustainability

- 3.12 As recognised in TAN 12, the factors that developers need to consider regarding environmental sustainability include achieving effective use and protection of natural resources, improving biodiversity and designing for change. As a result of the site's proximity to public transport, the site actively promotes the use of sustainable transport.
- 3.13 The proposal's design considers an energy strategy through a "fabric first" approach and passive design measures to reduce the energy demand of the development. Further energy saving measures will also be implemented, such as electric vehicle charging within the undercroft car park, as well as solar panels proposed on the roof plan.
- 3.14 All foul water generated by the proposed dwellings will discharge into the existing public sewers which are in Queen Street, this will replicate the existing drainage scenario although foul flows will slightly increase. This will be subject to a Section 106 application with Welsh Water Dŵr Cymru (DCWW).
- 3.15 In line with the SuDS principles, surface water will discharge to the existing surface water drainage system. The redevelopment includes a green roof structure which will provide the required attenuation and reduces the volume discharged by encouraging evapotranspiration.

Pre-Application Discussions

- 4.1 The proposed development has been subject to a pre-application enquiry with Neath Port Talbot County Borough Council (pre-application reference: Q2025/0152). The Case Officer (Claire Hall) has provided a written report concerning the proposal, and a meeting was held with the officer to discuss principles in detail. A summary of the written pre-application report is provided below. Follow up meetings have recently taken place with the LPA to agree on the building design. The officer mentioned that the DAS should also set out a clear explanation and justification for the proposed 16m window to window (14m balcony to balcony) distances, given that the Council's Adopted 'Design' SPG seeks a minimum of 21m for back-to-back relationships.

Officer Assessment

- 4.2 Local Context and Constraints

- Flood Map for Planning – Flood Risk Zone 3 (river and sea) and Zones 2 & 3 (surface water and small watercourse)
- Low Risk Coal Area
- Neath Town Centre Conservation Area
- Setting of Listed Building – 9 Queen Street (Cadw Ref.11820) – Grade II listed as a surviving example of C19 Queen Street shops.

Principle of Development

- 4.3 The officer acknowledged that the introduction of new residential accommodation within Neath Town Centre, particularly to upper floors where this does not lead to the loss of any ground floor commercial and/or retail development, is supported in principle, subject to other development management considerations (Policy R2/1).

Visual Amenity/Heritage Assets

- 4.4 The development site is centrally located near Neath's train and bus stations, presenting an opportunity to enhance the streetscape and support town centre regeneration. However, any proposed increase in building height must respect the character of the Conservation Area and the setting of the adjacent Grade II listed building on Queen Street. Concerns were raised about the current design, particularly its height and frontage, which may negatively impact the streetscape. The proposal should respond more sympathetically to the surrounding 2-storey Victorian terrace, especially in terms of roofline and shopfront character. Although a modern design is acceptable in principle, it must reflect the traditional Victorian and Georgian proportions, and further design revisions should be discussed with the Council's Heritage Officer using guidance from the Neath Town Centre Conservation Area SPG.

Flood Risk

- 4.5 Under the updated TAN 15 (March 2025), new vulnerable development (e.g. residential) is not allowed on greenfield sites within Flood Zone 3. However, the proposed scheme – with commercial use at ground level (less vulnerable) and residential above – may be acceptable in principle if it meets TAN 15 requirements. A Flood Consequences Assessment (FCA) must be submitted. Early engagement with Natural Resources Wales (NRW) is strongly recommended for pre-application advice.

Residential Demand & Amenity Standards

- 4.6 The Residential units must meet the Welsh Government's 'Beautiful Homes and Spaces' design standards. At least 25% of units must be affordable housing, with the design and layout influencing whether the Council's homelessness unit or partner Registered Social Landlords (RSLs) will engage. Engagement with the Council's Housing Strategy Team is advised. Current housing data indicates a high

demand for 1-bedroom General Needs accommodation, with a preference for schemes where the Council has 100% nomination rights.

- 4.7 As of 31/03/2025, 84% of the 259 applicants in temporary accommodation require 1-bedroom properties, highlighting a significant demand for 1-bed general needs housing in Neath. Therefore, any new provision of such units would help meet a clear and pressing housing need in the area.
- 4.8 It was recommended that the development include on-site amenity and open space to support placemaking and biodiversity, such as green roofs, terraces, or courtyards. Shared features like bike storage and rooftop gardens are supported, provided that adequate privacy and spacing. Due to the central location, an acoustically appropriate design is essential to mitigate noise from surrounding commercial activity. Under the 'agent of change' principle (PPW12 & emerging TAN 11), the developer is responsible for addressing any potential noise or air quality issues caused by existing uses. Measures must be included within the planning application to ensure a suitable living environment for future residents. Further guidance is available in the Pollution SPG.

Biodiversity

- 4.9 Due to the age and condition of the existing building, a bat and bird survey is the minimum requirement, with findings and any necessary mitigation/enhancement proposals to be submitted with the planning application. A Green Infrastructure Statement must be submitted, proportionate to the scale of the proposal.

4.10 Drainage

1. SAB Approval is required before any works begin on site.
2. If springs or groundwater seepage are discovered, work must stop in the affected area until an approved disposal scheme is submitted.
3. No interference with existing water features is permitted
4. Foul and surface water must be drained separately.
5. Surface or land drainage runoff must not connect to the public sewer system without written approval.
6. The site must include adequate drainage provisions to avoid disrupting drainage on adjacent land during and after construction.

Highways

- 4.11 No on-site car parking is required due to the site's central location near public transport, but secure cycle parking and bin storage must be included. No objection in principle from the Highways Officer

Specific Requirements:

- Visibility splays onto Queen Street Back Lane must meet Manual for Streets standards.
- A delivery plan is required for the retail unit, especially given Queen Street is pedestrianised. Show how deliveries will be managed via Queen Street Back Lane.
- Gates onto the highway must- Open inwards only, be see-through, Be maintained accordingly
- A detailed Demolition & Construction Environmental Management Plan (CEMP) must be submitted

Pre-Application Consultation Report (May-June 2026)

- 4.12 A pre-application consultation took place from the 13th May 2026 to the 10th June 2026. Site notices were displayed at the site and notices were served to adjoining owners/occupiers, community councillors and statutory/other relevant consultees. A summary of all responses received from consultees during this period can be seen below, and full responses can be viewed within the accompanying PAC Report and appendices.

Specialist Consultees

The Coal Authority

- 4.13 Confirmed that the site falls within the defined Development Low Risk Area and therefore have no comment to make.

Cadw

- 4.14 The proposed development will have no impact on the setting of the surrounding historic assets and therefore have no comment to make.

Mid and West Wales Fire and Rescue Service

- 4.15 No objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation.

Dŵr Cymru Welsh Water

- 4.16 The site is crossed by a public sewer with the approximate position being marked on the attached Statutory Public Sewer Record. No part of any building will be permitted within the protection zone of the public sewer measured 3 metres either side of the centreline. For completeness, we recommend the developer refer to their title deeds to confirm if there are any covenants or restrictions associated with the asset crossing the proposed development site. Our strong recommendation is that your site layout is amended to take into account the location of the assets crossing the site.

A large diameter brick egg sewer is located to the north east of the development site in the road and we would not permit a new direct connection to this sewer as this is a strategic asset.

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

We anticipate this development will require the installation of a new single water connection to serve the new premise. The provisions of Section 45 of the Water industry Act 1991 apply. We therefore rely on the Local Planning Authority to control the delivery of any required reinforcement or offsite works by way of planning condition at planning application stage.

Trunk Road Agency

- 4.17 Advise that the Welsh Government as highway authority for the A465 would not issue a direction in respect to a future planning application.

Natural Resource Wales

- 4.18 The FCA should be amended so that it is factually correct to aid the Local Planning Authority in its decision making for this proposal. Given that the official and most up to date flood risk data is the FMfP then the FCA should reflect the same level of flood risk.

We also have no comment to make on the application as submitted in respect to bats.

NPT Highways Authority

- 4.19 Whilst the principle of development is supported, concerns are raised in respect of highway safety, specifically relating to the proposed residential/staff parking provision and vehicular access arrangements.
1. Clarification to be provided on allocation of parking for residential/retail space within the development, and further justification is required for the overall parking provision.
 2. Concerns over increased traffic generation from a combination of resident/staff parking and service vehicles along Queen Street Back Road.
 3. Clarification needed for the proposed servicing arrangements, including safe and sufficient refuse collection towards the back of the property
 4. The proposed ground floor plan should be redesigned so that the doors to the cycle room and refuse collection open inwards.
 5. Visibility splay of 2.4m x 25m should be provided in each direction from the access, and pedestrian visibility splays of 2.4m x 2.4m should be provided on either side of the vehicular access.
 6. The parking dimensions shall be in accordance with the NPTCBC Parking Standards SPG 2016:
 - a. Disabled drivers' vehicles: 4.8m x 3.6m
 - b. Cars (EV Charging): 4.8m x 2.6m
 7. No development shall commence (including site clearance) until a Demolition & Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority.

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 Local Development Plan (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;
 - Relevant Supplementary Planning Guidance

The Development Plan

- 5.6 The development plan comprises Future Wales and the Neath Port Talbot Local Development Plan (2026).

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

Growth Strategy

- 5.9 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

Policy 1 – Where Wales will Grow

The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- Cardiff, Newport and the Valleys
- Swansea Bay and Llanelli
- Wrexham and Deeside

- 5.10 It is further explained that *"Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources"* (page 60).

- 5.11 The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows: *"Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being"* (page 60).

Placemaking

- 5.12 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"*.

- 5.13 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."*

5.14 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.

Biodiversity and Green Infrastructure

- 5.15 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).

- 5.16 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).

- 5.17 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

- 5.18 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).

- 5.19 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

- 5.20 The Neath Port Talbot Local Development Plan was adopted in January 2016 and comprises part of the prevailing development plan for the area.
- 5.21 The following LDP policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
<i>Strategic Policies</i>	
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
SP12	Retail
SP15	Biodiversity and Geodiversity
SP18	Renewable and Low Carbon Energy
SP19	Waste Management
SP20	Transport Network
SP21	Built Environment and Historic Heritage
<i>Topic Based Policies</i>	
SC1	Settlement limits
I1	Infrastructure Requirements
AH1	Affordable Housing
OS1	Open Space Provision
R2/1	Proposals Within Retail Centres
EN6	Important Biodiversity and Geodiversity Sites
EN7	Important Natural Features
EN8	Pollution and Land Stability
RE2	Renewable and Low Carbon Energy in 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

- 5.22 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.
- 5.23 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"*.
- 5.24 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

- 5.25 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"*.
- 5.26 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"*.
- 5.27 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 well being in the widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings"*.
- 5.28 A set of 'national sustainable placemaking outcomes' are outlined on page 17 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
- 5.29 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"*.
- 5.30 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 Places*⁹ which pinpoints the most relevant policy priorities and actions to aid in the recovery”.

- 5.31 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

- 5.32 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”.*
- 5.33 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”.*
- 5.34 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”.*
- 5.35 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”.
- 5.36 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”.*

Welsh Language

- 5.37 It is set out in PPW that the Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. Paragraph 3.29 states that *"If required, language impact assessments may be carried out in respect of large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language"*.

Sustainable Transport

- 5.38 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"*.

- 5.39 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"*.

- 5.40 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

- 5.41 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

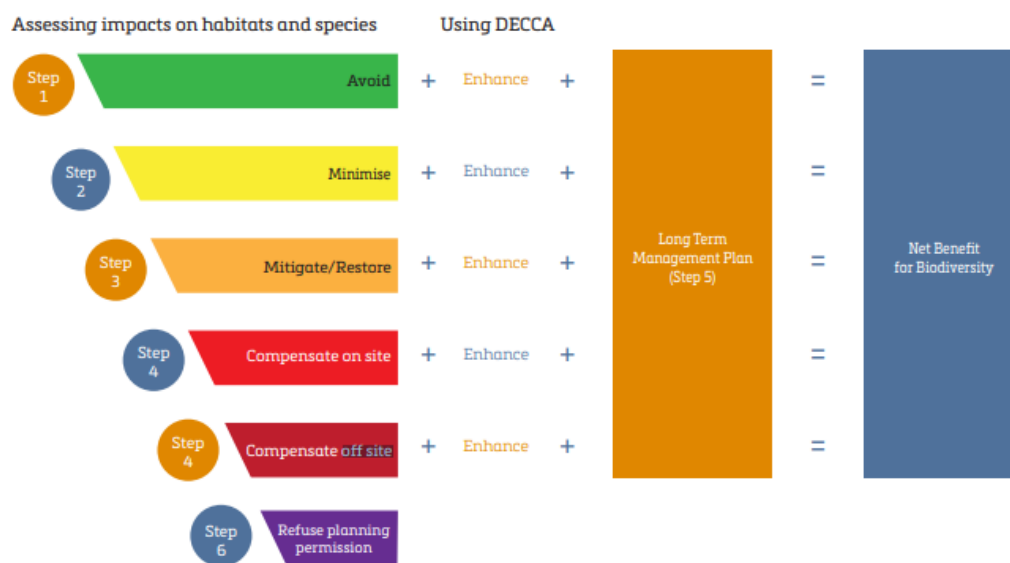
- 5.42 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this *"by locating development where there is, or can be, good access by public transport"*.

Green Infrastructure

- 5.43 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"*.

- 5.44 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”.*
- 5.45 The Step-Wise Approach is depicted at figure 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)

- 5.46 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

- 5.47 The following Technical Advice Notes (TANS) are of relevance to the proposed development:
- 5.48 TAN 2 Planning and Affordable Housing (2006): outlines the general concept of affordable housing as being: *“the ability of households or potential households to purchase or rent property that satisfies the needs of the household without subsidy”.* The guidance requires local planning authorities to: *“include an affordable housing target in the development plan which is based on the housing need identified in the local housing market assessment, indicate how the target will be achieved using identified policy approaches and monitor the provision of affordable housing against the target and where necessary take action to ensure that the target is met”.*

- 5.49 TAN 4 Retail and Commercial Development (2016): provides guidance regarding the provision of retail and commercial developments, including assessment of the appropriateness of such development spatially, and the potential resultant impacts upon established retail centres. The documents also provide guidance regarding where such developments should be encouraged.
- 5.50 TAN 5 Nature Conservation and Planning (2009): provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.
- 5.51 TAN 11 Noise (1997): provides advice on how the planning system can be used to minimise impact of noise without placing unreasonable restrictions on development. It outlines some of the main considerations which local planning authorities should take into account in drawing up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.
- 5.52 TAN 12 Design (2016): provides advice on design considerations and states that development should aim to:
- *Create places with the needs of people in mind, which are distinctive and respect local character*
 - *Promote layouts and design features which encourage community safety and accessibility*
 - *Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles*
 - *Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building*
 - *Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards*
 - *Secures the most efficient use of land including appropriate densities*
 - *Consider and balance potential conflicts between these criteria*
- 5.53 TAN 15 Development, Flooding and Coastal Erosion (2025) provides technical guidance which supplements the policies set out in PPW and Future Wales in relation to flooding and coastal erosion. It provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. It also provides advice on the consequences of the risks and adapting to and living with flood risk. It does not take precedence over other Technical Advice Notes and should be considered alongside other planning policies.
- 5.54 TAN 18 Transport (2007) confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.
- 5.55 TAN 23 Economic Development (2014) includes guidance on the role of land use planning in generating wealth, jobs, and income. It provides detailed planning advice on economic development and emphasises the importance of economic considerations in the planning decision-making process. The TAN also outlines how local planning authorities should assess the economic benefit associated with allocating sites and determining planning applications for economic development.

- 5.56 TAN 24 The Historic Environment (2017) states that development in Conservation Areas should put an emphasis on controlled and positive management of change that encourages economic vibrancy and social and cultural vitality, and accords with the area's special architectural and historic qualities.

Local Planning Authority Supplementary Planning Guidance

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

- Planning Obligations (October 2016)
- Parking Standards (October 2016)
- Affordable Housing (October 2016)
- Biodiversity and Geodiversity (May 2018)
- Pollution (October 2016)
- Open Space & Greenspace (July 2017)
- Renewable and Low Carbon Energy (July 2017)
- Design (July 2017)
- The Historic Environment (April 2019)

Any other relevant documents

- 5.58 Additional material for consideration includes:

- Cadw Setting of Historic Assets in Wales (May 2017)
- Neath Town Centre Conservation Area SPG (March 2006) – *Not Adopted*

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
 - Design
 - The impact and highways and parking
 - The impact on residential amenity
 - Biodiversity and green infrastructure
 - Other material considerations

The principle of development

- 6.3 The development site lies within the settlement limits of Neath as defined by LDP Policy SC1 (Settlement Limits) and associated proposals map. Development within settlement limits that is proportionate in scale and form to the role and function of the settlement is generally supported in principle. Furthermore, PPW outlines that previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. The site is brownfield in nature and therefore, the principle of developing this site is acceptable in this regard. The site lies in an inherently sustainable location, with a range of services and facilities within walking distance of the site which include strong public transport connections.
- 6.4 The development comprises 2 retail or commercial units at ground floor which will front onto Queen Street and this assist in achieving an open and inviting active frontage. Retail / commercial units play a key role in sustaining the attractiveness, vitality and viability of town centres. The retail / commercial units will help increase footfall in the area, provide employment opportunities and offers an active frontage onto Queen Street. The adopted LDP encourages retail uses within town centres such as Neath, therefore the proposal complies with LDP Policy SP12 (Retail).
- 6.5 Policy R2/1 within the LDP requires development to enhance the vitality, viability and attractiveness of Neath Town Centre and for proposals to integrate with and strengthen the layout, retail character and pedestrian flows. The planning officer has confirmed that the introduction of new residential accommodation within Neath Town Centre, particularly to upper floors where this does not lead to the loss of any ground floor commercial and/or retail development, is supported in principle, subject to other development management considerations.
- 6.6 Another key retail policy in the LDP is Policy R2 (Proposals Within Retail Centres). Having reviewed the policy, only the first point is applicable in relation to the proposed development which has been addressed below:
- 6.7 *Within the designated retail centres, uses that would enhance the vitality, viability and attractiveness of the centre, including uses in classes A and D will be permitted where:*

a) The proposal integrates with and strengthens the layout, retail character and pedestrian flows of the centre

- The proposal will integrate well into the Town Centre as a result of it being an A1/A2/A3/D2 use that will retain the predominant shopping role and function of the centre.

b) Does not prejudice the effective use of upper floors

- It is proposed to use the upper floors for residential accommodation. The ground floor retail use will not prejudice the proposed use of the upper floors.

c) Maintains a vibrant and attractive shopping street frontage.

- The retail unit will provide a vibrant and attractive shopping frontage that will contribute towards the vibrancy and vitality of Neath Town Centre.

6.8 In summary, the retail element of the proposal accords with LDP Policy R2 (Proposals Within Retail Centres).

6.9 Residential apartments are proposed across the first, second and third floors of the four-storey building. Eighteen apartments are proposed, all of which having a similar floor space area and layout. Policy SP7 (Housing Requirement) identifies a need to provide 8,760 additional dwellings between 2011 and 2026. Policy AH1 (Affordable Housing) states that a minimum of 25% of units shall be provided as affordable housing units within Neath for all developments accommodating 3 or more units.

6.10 With regard to the above, the proposal complies with Policy SC 1 (Settlement Limits) as the development lies within the defined settlement limits, proportionate in scale and form to the role and function of the settlement, and should therefore be acceptable in principle. As such, the principle of development is firmly established in the context of the prevailing LDP policies, as confirmed by the Local Planning Authority. The scheme also adheres to guidance within Planning Policy Wales (Edition 12) as the proposal will re-use previously developed land, promoting sustainable development principles.

Design

6.11 The proposal will implement high-quality building materials and a contemporary design which respects and responds to the immediate buildings in terms of scale, setback and architectural character. The development offers an opportunity to modernise and transform the visual appearance of the existing buildings to create a more positive streetscape.

6.12 Comments from the planning officer within the pre-application response stated that *'a good design offers potential for positive place-making in this key location within the town centre and the economic regeneration benefits should also form part of the design/justification for the development'*. However, concerns were raised over the legibility of the building proportions in relation to the adjoining buildings. This issue has been addressed below and confirmation was later received from the planning officer that the proposed layout was acceptable.



Figure 9: Proposed Part Elevations (Hammond Architectural Ltd)

- 6.13 The building has been adapted to compliment the height of the existing structures (no. 6 Queen Street and Sports Direct further south) and considers the existing Victorian and Georgian proportions as the windows on the first floor align with the windows of the adjoining building frontages. The development also relates to the Conservation Area SPG to examine the building design within the Neath Town Conservation Areas. The shop front is designed in relation to the proportions of the rest of the building and/or adjoining frontages, with the front windows being the same scale as the adjoining retail stores. The SPG also states that *'there is no wish to discourage modern or innovative design that is of good quality, but consideration should be given to the period of the buildings if changes are proposed'*. The development proposals have reconsidered the building materials used for the development, by using grey brickwork and white render to compliment the adjoining Peacocks building, the M&S Store opposite, and the smaller retail stores.
- 6.14 Following on from the pre-application stage, the applicant now owns no. 8 Queen Street which was not included in the original proposal plans. This has allowed the applicant to increase the number and overall floor space of the upper apartments, whilst also providing an additional retail unit along Queen Street. This was also encouraged by the planning officer during pre-application discussions, stating: *"It is unfortunate that the proposal does not also include No.8 Queen Street which abuts the much taller Art Deco 'Peacocks' building at No.6 Queen Street. Without it, the application site must consider how it sits within the wider 2-storey Victorian terrace on either side of the site"*. The new building will now complement the elevations of no. 6 QS and integrate with the existing streetscape.
- 6.15 With regard to the above, it is proposed that the development would have a positive contribution on the existing streetscape and provide economic benefits to the existing primary shopping street. The LPA raise no objections in principle to a modern interpretation as being evolutionary in Queen Street. Overall, the proposal complies with Policy BE1 (Design) as the building will complement and enhance the character and appearance of the site and buildings along Queen Street. The building will also implement sustainable design principles, by providing solar arrays on the roof and green infrastructure within the central courtyard. The addition of a high-quality designed building in the Town Centre offering both retail and residential uses should be considered favourably.

The impact on highways and parking

- 6.16 The application site is well positioned in Neath Town Centre, being located near to the A465 and within walking distance of several facilities and services including those within the town centre. The site lies in close proximity to Neath's Bus and Train Stations. The site therefore has excellent sustainability credentials with numerous opportunities in terms of both utilising public transport and promoting active travel. Access to the residential apartments is provided via two staircases which can be accessed via Queen Street and Queen Street Back Lane.
- 6.17 The proposal will provide 2 disabled parking spaces and 2 EV charging bay, as well bike storage for both staff and residents at the property. The undercroft car park will be on the first floor below the apartments, which will be accessible via Queen Street Back Road. The proposal meets the aims of reducing car use, as the site falls within a highly sustainable and accessible location near numerous transport networks. The case officer expressed that there is no expectation to provide any on-site car parking as part of the proposals, given that the site is located in the town centre within close proximity to existing train and bus stations. We are providing parking spaces for disabled access and EV charging, even though the reliance on cars by residents or visitors to the retail unit will be minimal. There will also be pay and display pay and display car parks and short stay spaces near the site.
- 6.18 The Council's Highways Officer raises no objection in principle to the development in this location. To address the observations made by the officer, we have provided vehicular visibility splays onto Queen Street Back Lane, in accordance with Manual for Streets (figure 10 below)

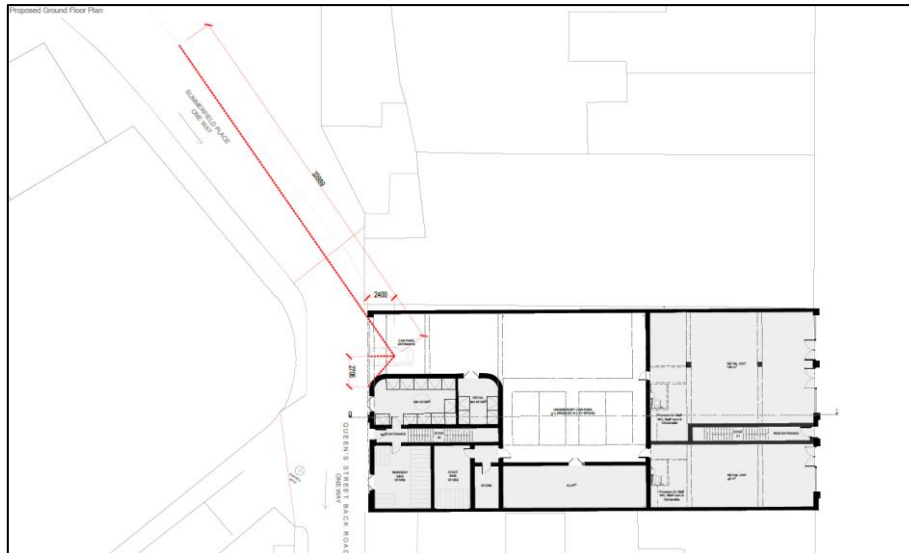


Figure 10: Visibility Splays onto Queen Street Back Lane

- 6.19 The approach road is angled and is limited to 20mph. It is also a one-way street which has one footpath on the opposite side of the road. The vision splay distance in the direction of approaching traffic is over 30m, where only 25m is required for a 20mph road. There is only a 2.7m vision splay to the left, however given the road is a one-way street, this would only concern approaching pedestrians from the opposite direction. The gates are currently roller shutter style, which can be perforated or chain link style down the line, which ensures they do not open outward onto Queen Street Back Lane.
- 6.20 The Highways Authority identified potential highway safety issues at the pre-application consultation stage, specifically concerning the adequacy of the proposed residential/staff parking provision and vehicular access arrangements. In response to these comments, the scheme has been reviewed and amended where necessary, and additional supporting information has been provided as part of the full application.
- 6.21 Firstly, no staff parking is proposed as part of the development, consistent with the existing arrangement for the three retail units currently onsite. There is an existing garage door to the back of two of the units which provides some space for operational purposes, albeit it's only big enough for a car. A Sustainability Statement has also been submitted with the application to justify the proposed level of parking provision. After conducting the sustainability assessment, the site scored 11 points which proves that the site is located within a highly sustainable location, with local facilities, train station and bus stops all located within 200m of the site. Despite not delivering 1 space per dwelling, it provides a strong argument for parking reduction in terms of sustainability. As the total points scored is above the 10-pts standard, a parking reduction of 2 spaces per dwelling is applied to the overall scheme.
- 6.22 Secondly, the back road is already subject to double yellow line restrictions as well as some on-street parking associated with the Victoria House flats. As mentioned, the road is a one-way system and there is a pedestrian footpath on the opposite side of the road. Only 4 no. parking spaces will be provided for residents and none will be provided for the proposed retail units, therefore it is unlikely that congestion will be exacerbated by future residents or staff members. The proposed parking spaces will also be contained within the undercroft parking area within the building, as opposed to the existing spaces right beside the road. Additionally, the refuse collection point will also be provided within the building, which will reduce bin storage along the back street. /the proposed development will improve the general arrangement and reduce obstruction along Queen Street Back Road.

- 6.23 Thirdly, servicing of the retail units will be take place along Queen Street (front elevations) before 10:00am, where vehicles are permitted access along the pedestrianised street for servicing purposes. Residential refuse will be collected directly from the bin store by collection operatives, whilst commercial waste will be managed by retailers, and brought out for collection at the appropriate times.
- 6.24 Furthermore, the ground floor layout will be amended so that the rear access doors open inwards, or alternatively roller shutters will be provided. The proposed parking spaces will also be revised to ensure compliance with the NPTCBC Parking Standards SPG (2016):
- a. Disabled Drivers Vehicles: 4.8m x 3.6m
 - b. Cars (EV Charging): 4.8m x 2.6m
- 6.25 Finally, a Demolition and Construction Environmental Management Plan will be submitted prior to the commencement of works to manage construction-related impacts.
- 6.26 To conclude, the site is in a sustainable location within Neath Town Centre and is connected by exceptional access to public transport facilities, cycle and pedestrian routes and local amenities within the town centre. Although the proposal conflicts with the Parking Standards SPG, the sustainability assessment justifies the level of parking provision given the site's proximity to nearby services. The proposals accord with LDP Policies SP20 (Transport Network) and TR2 (Design and Access of New Development), as the development will not negatively impact highways and access safety, and will not lead to a substantial increase in traffic volume along Queen Street Back Lane.

The Impact on Residential Amenity

- 6.27 The proposal will supply 18 new apartments within the city centre, and contribute a minimum of 25% affordable housing, in line with Policy AH1 of the Neath Port Talbot LDP and the Welsh Governments development quality standards.
- 6.28 With regard to housing demand within the area, the Council's Housing Officer has observed that there is evidence which suggests there is a considerable demand for 1-bed accommodation within the Neath East and South wards. The housing stock information provided within the planning officer's report found that the percentage among the 259 applicants in temporary accommodation that require 1-bed properties is 84%, as of 31/03/2025. With respect to the comments provided from the housing officer, the scheme contributes towards the housing demand within the Neath area by providing 18 x 1/2-bed apartments within Neath Town Centre.
- 6.29 The proposal will provide shared amenity spaces in the form of a central courtyard for the residents, to maximise density on a small urban footprint. This will also include green space/infrastructure and bike storage. This will contribute towards positive place-making objectives, including biodiversity net gain. The planning officer stated that there were no objections to the proposed shared amenities (e.g., courtyard design, rooftop gardens, bike storage) subject to satisfactory window-to-window distances being achieved both within the development itself and in terms of its relationship with existing neighbouring residential occupiers. Following the earlier pre-application plans, slight adjustments have been made to the newly revised plans to ensure that the proposed building symmetry aligns with adjoining and surrounding buildings along Queen Street.
- 6.30 Residential flats will overlook the internal courtyard and the distances achieved between window to window are 16.5m and balcony to balcony 14.2m. The distances are visually demonstrated in the DAS. The distances were discussed with officers at pre-application and it was confirmed that these are acceptable. External to the proposed building there are few other potential impacts on residential properties as a result of the development. There are no new relationships created which result in an unacceptable impact.

- 6.31 In light of the above, the proposal conforms to Policy AH1 (Affordable Housing) as the development contributes a required affordable housing provision of 25% within the Neath area. Moreover, the scheme supports Policy SP7 (Housing Requirement) with the addition of 18 new residential units, thus contributing towards the Council's required housing provision of 7,800 new dwellings between 2011-2026.

Biodiversity and Green Infrastructure

- 6.32 The proposal intends to implement green infrastructure and planting within the central resident courtyard and on the roof. This includes shrub planting around the courtyard perimeter and trees within the centre. Access to greenery within the building will encourage social interaction, promote relaxation, and support biodiversity by attracting birds and other wildlife within the area.
- 6.33 A Green Infrastructure Statement has been prepared by Stiwdio Owens Landscape Architects which outlines how the proposals adhere to the step-wise approach and DECCA framework within Planning Policy Wales (Edition 12). In addition, a soft landscape design has been prepared to ensure a number of enhancements are integrated into the development and where possible a net benefit for biodiversity is provided.
- 6.34 Firstly, the development footprint sits within an area which is identified as being low ecological value, therefore the proposal will not have any adverse impacts on habitats and/or species as a direct result of the development. Furthermore, tree and shrub planting have been proposed within the soft landscaping design to mitigate any loss as a result of the development.
- 6.35 In line with PPW, the development seeks to provide a net benefit for biodiversity. These are provided through a number of enhancements that aim to align with the DECCA framework including:
- **Diversity** – enhancing diversity by providing new tree and shrub planting;
 - **Extent** – proposed shrub planting within the courtyard to maintain and increase semi-natural habitat areas and linkages;
 - **Condition** – improving the condition of the site with the implementation of a long-term management and maintenance plan;
 - **Connectivity** – creating soft landscape areas within the site that links between habitats and improves connections; and
 - **Aspects of resilience** – integration of elements within the scheme to improve adaptability and resilience to future pressures. This includes tree planting to help with cooling, shading and carbon storage, vegetation cover to reduce water runoff, along with a range of varied size/ scales of habitats to contribute to ecological value and resilience.

- 6.36 Overall, the habitat value of the site is considered to be low with limited botanical diversity as a result of the existing buildings and urban context. A number of potential impacts have been avoided due to the arrangement of the development. a range of planting proposals have been included within the scheme with the aim of mitigating any losses as a result of the development, diversify the ecosystems, and provide a net benefit for biodiversity. The proposal is in alignment with the DECCA framework contained within Planning Policy Wales (Edition 12) and is compliant with the relevant environmental policies within the adopted Local Development Plan.

Other material considerations

Flood Risk and Drainage

- 6.37 As outlined above, the site lies within flood zone 3 for river and sea flooding, and is also located within flood zones 2 and 3 for surface water and small watercourse flooding.

- 6.38 The accompanying drainage strategy sets out approaches on how the development can manage surface and foul water sustainably, whilst meeting the regulatory requirements. At present, all surface water runoff generated by the 714m² impermeable surfacing (roofs and hard standing) is discharged into rainwater pipes and directly onto the public highway or pedestrian areas. From here the surface water runoff is then collected in gullies before discharging into the combined sewer. In line with the SuDS principles, surface water will discharge to the existing surface water drainage system subject to CCTV surveys being undertaken. The surface water drainage system has been designed to accommodate storm events up to and including the 1 in 100-year event with a 40% allowance for an increase in rainfall intensity due to climate change. All foul water generated by the proposed dwellings will discharge into the existing public sewers which are in Queen Street, this will replicate the existing drainage scenario although foul flows will slightly increase. This will be subject to a Section 106 application with Welsh Water Dwr Cymru (DCWW).
- 6.39 The development will decrease flood risk downstream and the peak runoff rate will also be reduced post development. Prior to construction, a full-SAB application will be submitted to the local SuDS Approval Body (SAB) for review and approval. This process ensures compliance with national standards and facilitates the adoption and maintenance of SuDS features.
- 6.40 The FCA provided by Brookbanks shows that the Site is not at risk of flooding within the 0.1% AEP (1000 year) tidal flooding scenario. Access to the development is not inhibited by tidal floodwaters as roads within the direct vicinity of the development are not inhibited by flood waters. The proposed development is located outside of the modelled floodplain and therefore existing ground levels retained. NRW modelling as seen below shows that the Site is not at risk of flooding within the 0.1 % AEP fluvial flooding scenario, however, it should be noted that the NRW fluvial modelling data is over ten years old. It is also noted that this is the most current form of this data available at time of writing. The below images show that the nearest extent of the NRW modelled 0.1%AEP tidal flooding is approximately 100m northwest from the Site boundary, at around 6 to 7mAOD. Even with climate change allowances added the tidal level would not reach anywhere near the site which is over 10mAOD. Without the climate change scenarios being run through the NRW model, this assessment can only be based on the currently available information. However, based on the available modelled extents, surrounding levels, and distance from the Site, it is considered unlikely that either the tidal or fluvial 0.1% AEP plus climate change events would affect the Site.
- 6.41 In line with sections 10.22 – 10.25 of TAN:15 the proposals meet the development strategy of providing regeneration within the town centre to achieve economic objectives set by the local authority. The proposals are strongly supported by the Local Planning Authority and this has been established through pre-application discussions.
- 6.42 The development proposals will maintain the sites existing context in terms of flood risk and vulnerability of uses with less vulnerable commercial uses on the ground floor. In this instance, the scheme contributes to the Development Plan Strategy by providing affordable housing within the town centre and regenerating existing shopfronts to achieve economic objectives within the local area.

Heritage

- 6.43 The site lies within the Neath Town Centre Conservation Area (SP21/4(c)) where development proposals will be dealt with in accordance with national policy and guidance, which includes additional controls on demolition set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Policy SP21 states that full regard will be paid to the effects of proposals on the character of the conservation area, with the objective of ensuring that all proposals accord with the need to preserve or enhance the area's identified character, appearance and setting.

- 6.44 As noted in the site context section above, the site also lies immediately adjacent D S Morgan (No. 9 Queen Street – Grade II Listed Building). The building has been designated as it is a surviving example of 19th century Queen Street shops. Other historic assets within the vicinity include 23 Green Street, Mosaic Temple and Victoria Gardens.
- 6.45 The pre-application response stated *“A good design offers potential for positive place-making in this key location within the town centre and the economic regeneration benefits should also form part of the design/justification for the development. There is no objection in principle to a modern interpretation as being evolutionary in Queen Street, however the design approach to the proposed new building needs to better consider the existing Victorian and Georgian proportions, particularly in terms of legibility of each storey.”*
- 6.46 The setting of a historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive, negative or neutral contribution to the significance of an asset.
- 6.47 The guidance notes states that applicants for planning permission should provide the local planning authority with sufficient, but proportionate, information to allow the assessment of the likely impact of proposals for development on a historic asset and its setting. For proposals involving a minimum impact on a single asset, a simple checklist approach derived from Cadw’s ‘Setting of Historic Assets in Wales’ document to the assessment with a short statement for each of the four stages described below may be sufficient.

Stage 1: Identify the Historic Assets

- 6.48 The historic assets have been identified below. Although the development would sit directly adjacent no. 9 Queen Street, it is considered that the building would not be significantly visible from the remaining listed assets.
- **Neath Town Centre Conservation Area** (SP21/4(c)): features of importance include the traditional commercial centre with some small shop units, the general market, public buildings, the castle, St. Thomas' church, Victoria Gardens and other architectural features and structures.
 - **D S Morgan** (no. 9 Queen Street, Cadw ref 11820): Grade II Listed Commercial Building designated for being a surviving example of a 19th Century Queen Street Shop. Located 9.8m from the site, on the street line adjoining the Marks and Spencers store.
 - **23 Green Street** (Cadw ref 11786): Grade II Listed Commercial Building. Early/mid-19th Century, 3-storey commercial building with modern shop front on ground floor. Located approx. 30m northwest of the site on the corner of Queen Street.
 - **Masonic Temple** (no. 29 Queen Street, Cadw ref 11821): Grade II Listed Institutional Building. 1848 2-storey structure built with cambered stone lintel exterior. Located approx. 62m south east of the site midway along Queen Street.
 - **Victoria Gardens** (Cadw ref PGW(Gm)64(NEP)): Grade II Registered Historic Park and Garden. Well preserved Victorian urban public park, with most of its original layout and features, including a fine bandstand and inclined beds used to display carpet bedding designs. Located approx. 114m south east of the site adjacent Neath Bus Station.

Stage 2: Define and Analyse the Setting

- 6.49 As mentioned, the identified historic assets fall within the Neath Town Centre Conservation Area, which has been designated for its architectural quality and historical importance. Some features of importance include the traditional commercial centre with some small shop units, the general market, public buildings, the castle, St. Thomas' church, Victoria Gardens and other architectural features and structures. There are

over 40 buildings/structures within the conservation area that are individually listed by CADW for their special architectural or historical importance.

- 6.50 The surrounding area predominantly consists of 2/3 storey terrace flats with ground floor retail. Existing materials defining the character and appearance of the conservation area include stone, brick, render, timber for windows and doors, and slate roofing. The majority of buildings within the area are 2/3 storey terraced shop fronts with residential accommodation above. The surrounding upper-level flats have undergone minimal change; however, numerous ground floor retail stores have been renovated/commercialised due to change in occupiers, such as the M&S and Sports Direct buildings either side. Queen Street mainly comprises 2 storey mixed use terraced buildings towards the south end/midway along the street, however, there are rows of 3/4 storey terraced buildings towards the north end of the street. The proposed development will adjoin these buildings towards the north and will complement the height of the existing street proportions.
- 6.51 Overall, the listed buildings along Queen Street have been preserved or have undergone minimal refurbishment, with previous planning applications only concerning change of use and advertisement consent. Notwithstanding, the area comprises a variety of buildings which retain historic value, have been commercialised by introducing modern design principles, and few which have been physically neglected.

Stage 3: Evaluate the Potential Impact of Change or Development

- 6.52 It is important to evaluate whether the proposed development can be incorporated sensitively to the setting of the listed building. In terms of visual impact, there is a possibility that the development could overshadow/dominate the listed building opposite (no. 9 Queen Street), however the Peacocks building directly adjacent (no. 6 Queen Street) is already of significant scale compared to the historic asset. The presence of no. 6 signifies the height and scale of the proposed development, and it is considered that the addition of a contemporary building of a similar scale would not pose a significant impact compared to the existing Peacocks building adjacent.
- 6.53 With regard to non-visual impacts, the newly proposed ground floor retail space will enhance the vibrancy along Queen Street and draw more people to the shopping street. As mentioned, the existing no. 10 property within the site remains vacant and neglected. The proposal will replace this building to provide a new active frontage, creating a warmer and safer environment for passing pedestrians. The introduction of upper residential flats will also reinforce neighbourhood identity within the area. The 'Setting of Historic Assets in Wales' document produced by Cadw outlines:

"Changes can also have a positive impact that may enhance the setting, such as returning a sense of enclosure to sites where it has been lost."

- 6.54 Overall, the proposal will provide a contemporary building which accentuates and enhances Neath's rich architectural context.

Stage 4: Mitigation

- 6.55 Mitigation is the action taken to avoid or minimise any harm to the significance of a historic asset and its setting. Slight modifications have been implemented to the design to ensure the proposed building reflects the surrounding context where possible. The retention of ground floor retail also ensures that the development does not detract from the existing shopping street.
- 6.56 The street elevations have been adapted to address the pre-application response, so that the upper flats/windows align with the existing street proportions and roof height. Recent design proposals ensure that the windows and symmetry match the existing street scene, and the external materials have been

narrowed down to white façade and grey/white brick to blend with the existing street scene/no. 6 Queen Street. The proposal avoids the overuse of brickwork and other alternative materials which would be alien to the adjoining properties. The addition of no. 8 Queen Street will now also provide an even streetscape beside no. 6, as opposed to the previous pre-application plans which only included no's 10-12.

- 6.57 After undertaking the Impact Assessment regarding the nearby historic assets, it is considered that the proposed development will not have a damaging impact on the setting of the nearby listed buildings or conservation area. The scheme also complies with Policy SP21 (Built Environment and Historic Heritage) as the proposal encourages high quality design standards and has identified the relevant historic assets/designations to enable their protection and/or enhancement.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Cardiff Building Company in relation to the proposed full planning application for the proposed demolition of existing buildings and construction of mixed-use development comprising ground floor retail / commercial use (A1, A2, A3 or D2 use) with upper levels of residential and associated works
- 7.2 The proposal satisfies the requirements of Policy SC1 as the site falls within the defined Settlement Limits of Neath Port Talbot County Borough, where development that is proportionate in scale, form, and function set out in the Settlement Hierarchy should be considered acceptable in principle. The scheme will also regenerate existing buildings on previously developed brownfield land, which should be deemed as favourable sustainable development. Furthermore, the proposal is in accordance with Policy R2/1 of the Development Plan, with the pre-application response also confirming that the introduction of new residential accommodation and ground floor retail within Neath Town Centre is supported in principle. As such, the principle of development is firmly established in the context of the prevailing LDP policies, as confirmed by the Local Planning Authority.
- 7.3 The development will construct a high quality and contemporary mixed-use building which will aim to enhance the existing streetscape along Queen Street. The scale and design proposals of the building have been adapted to take into account the existing street proportions and context along the retail high street. The LPA raise no objections in principle to a modern interpretation as being evolutionary in Queen Street. Overall, the proposal complies with Policy BE1 (Design) as the building will enhance the character and appearance of the site and overall area, without causing an adverse impact on neighbouring amenity.
- 7.4 The site is located within a highly sustainable location within Neath Town Centre, with direct access to nearby public transport services and a walkable environment. Although the development provides undercroft parking and bike storage, there is no requirement for the proposal to comply with the adopted Parking Standards SPG, due to its sustainable location and close proximity to public/active transport networks. No objections were raised by the Highway's Officer on the scheme's parking layout or location of the proposal. Therefore, it is deemed that the proposal complies with the relevant transportation policies as the development will not negatively impact highways and access safety, and will not lead to a substantial increase in traffic volume along Queen Street Back Lane.
- 7.5 The development proposals will maintain the sites existing context in terms of flood risk and vulnerability of uses with less vulnerable commercial uses on the ground floor. In this instance, the scheme contributes to the Development Plan Strategy by providing affordable housing within the town centre and regenerating existing shopfronts to achieve eco-nomic objectives within the local area.
- 7.6 The scheme contributes towards the housing demand for 1-bedroom apartments within the area, as outlined by the Council's Housing Officer, by providing 18 x 1-bed apartments within Neath Town Centre. The residential apartments will also contribute a minimum of 25% affordable housing, in line with Policy AH1 of the Neath Port Talbot LDP and the Welsh Governments development quality standards.
- 7.7 Given the low habitat value and green infrastructure within and around the existing site, the development will deliver a net benefit for biodiversity through shrub and tree planting within the central courtyard and the roof. These proposals will have a positive impact on future residents and provide suitable habitat for local wildlife. Considering the location and context of the development, the proposal is considered compliant with Policy SP15 (Biodiversity and Geodiversity) of the Local Development Plan.

- 7.8 The proposals therefore comply with the relevant national and development plan planning policies and supplementary planning guidance. It is for these reasons that it is respectfully requested that Neath Port Talbot County Council grant planning permission for the proposed development.