

PLANNING STATEMENT

Outline planning application for the development of up to 153 no. homes; with all matters reserved.

LAND NORTH OF CRYMLYN PARC
SKEWEN
NEATH

October 2024



Summary

Proposal:

Outline planning application for the development of up to 153 no. homes; with all matters reserved.

Location:

Land North of Crymlyn Parc, Skewen, Neath

Date:

October 2024

Project Reference:

S24.126

Client:

Hale Group & Pobl Group

Product of:

Asbri Planning Limited
Suite D 1st Floor
220 High Street
Swansea
SA1 1NW

Prepared by:

Oliver Hanney

Approved by:

Phil Baxter

Disclaimer:

This report has been prepared for the sole and exclusive use of client whom it was commissioned and has been prepared in response to their particular requirements and brief. This report may not be relied upon by any other party.

The Contracts (Rights of Third Parties) Act 1999 shall not apply to this report and the provisions of the said Act are expressly excluded from this report. This report may not be used for any purpose other than that for which it was commissioned. This report may not be reproduced and/or made public by print, photocopy, microfilm or any other means without the prior written permission of Asbri Planning Ltd. The conclusions resulting from this study and contained in this report are not necessarily indicative of future conditions or operating practices at or adjacent to the Site. Much of the information presented in this report is based on information provided by others. That information has neither been checked nor verified by Asbri Planning Ltd.

Contents

Section 1

Introduction

Section 2

Site Description

Section 3

Planning History

Section 4

The Proposed Development

Section 5

Planning Policy Context

Section 6

Key Planning Considerations

Section 7

Conclusion

1.0 Introduction

- 1.1 This Planning Statement has been prepared by Asbri Planning on behalf of the applicant, Hale Group and Pobl Group, in support of an outline planning application to be submitted to the Neath Port Talbot County Borough Council for the proposed development of up to 153 no. homes; with all matters reserved at Land North of Crymlyn Parc, Skewen, Neath.
- 1.2 As part of this application, the following application plans/drawings are submitted:

Drawing Name	Prepared By
Site Location Plan	Spring Design
Illustrative Masterplan (scale parameters)	Spring Design
Illustrative House types (scale parameters)	Spring Design
Illustrative Drainage/Engineering Plan	CB3 Consult
Landscape Strategy	Tir Collective
Planting Strategy	Tir Collective
Play Strategy	Tir Collective
Topographical Survey	Senior Surveys

- 1.3 The following supporting documents are submitted alongside the Planning Application:

Document	Prepared By
Application Forms	Asbri Planning
Planning Statement	Asbri Planning
Design and Access Statement	Spring Design
Transport Assessment	Acstro
Tree Survey	ArbTS
Noise Survey	Acoustic Consultants Ltd
Ecological Surveys	Hawkeswood Ecology
Green Infrastructure Statement	Tir Collective
Drainage Strategy	CB3 Consult
Site Investigation	Terra Firma
Waste Management Plan	Hale Group
PAC Report	Asbri Planning
Air Quality Assessment	Air Pollution Services

- 1.4 The Planning Statement assesses the requirement of local and national planning policy relevant to the application site and is structured as follows:

- Section 2: Site Description & Surrounding

- Section 3: Planning History
- Section 4: The Proposed Development
- Section 5: Planning Policy Context
- Section 6: Key Planning Considerations
- Section 7: Conclusion

2.0 Site Description & Surroundings

- 2.1 The application site is located within the settlement of Skewen, Neath, situated approximately 4.1 km west of Neath town centre, and approximately 1.45 km west of Skewen village centre. Located in the west of Skewen, the application site extends to approximately 4.7 Ha and currently comprises three field parcels of agricultural land. The site contains green pasture that is used for grazing animals, alongside trees and hedgerow which line the perimeter of the site and provide the internal demarcations of the field parcel boundaries. Access to the site is currently gained from within Pentwyn Farm, which adjoins the site to the west, via an agricultural gate.
- 2.2 In respect of surroundings, the application site is bound by residential dwellings to the east, at Cae Morfa. Further residential dwellings are found to the south of the site at Crymlyn Parc, however these are separated from the site by a strip of open space (including a playground) which runs the length of the site's southern boundary. Pentwyn Farm is situated immediately west of the site, with the farm buildings adjoining the north western corner of the site and further agricultural land situated to the south west. An area of greenfield land adjoins the site to the north, used in conjunction with Pentwyn Farm. In respect of notable features in the surrounding area, railway tracks are located approximately 40 metres to the north at its closest point, and approximately 75 metres to the south west at its closest point. The M4 Motorway is found approximately 80 metres north of the site, at its closest point.
- 2.3 The application site occupies an inherently sustainable location within Skewen, highlighted by its proximity to a large quantum of residential dwellings found in the immediate vicinity of the site. As noted above, Skewen village centre is located approximately 1.45 km west, which includes Skewen train station, providing access to services to Swansea, Neath, Port Talbot, Bridgend & Cardiff. A range of services can be found in Skewen, including primary school, shops, cafes, restaurants, places of worship, public open space, doctor's surgery and public house. The nearest bus stop is at Crymlyn Parc, approximately 350 metres east of the site, providing access to the 155 Llandarcy – Neath service.

3.0 Planning History

- 3.1 Asbri Planning have undertaken a review of the Neath Port Talbot online planning register, which did not identify any relevant historic planning applications associated with the subject site.

4.0 The Proposed Development

- 4.1 The application proposes the development of up to 153 no. homes; with all matters reserved at Land North of Crymlyn Parc, Skewen, Neath. The proposed residential development, as demonstrated by the illustrative masterplan seeks to deliver market and affordable homes comprising the following accommodation types:
- One bedroom apartments (two and three storey blocks)
 - Two bedroom houses
 - Three bedroom houses
 - Four bedroom houses
- 4.2 The proposed layout builds on the development concept and key design principles set out within the Design and Access Statement prepared by Spring Design which accompanies the submission. The development seeks to achieve a permeable and cohesive development that sits well within the existing context of the site surroundings, creating an attractive place to live.
- 4.3 The development proposals utilise a comprehensive scheme of new landscape planting, alongside the retention of existing green infrastructure features, to deliver a verdant, attractive setting for the proposed homes. It is considered that the scheme adopts a wholly green infrastructure led approach towards design, which should enable biodiversity gain and ecological enhancement. This approach is evidenced in the retention of green corridors within the site, broadly replicating and maintaining the agricultural field demarcations which currently contribute towards the character and ecological value of the site. Furthermore, green infrastructure retention plays a key part in providing landscape screening at the site's northern boundary – again retaining the features which characterise the site.
- 4.4 Alongside landscape planting, the scheme proposes to utilise Sustainable Drainage features throughout the site. This includes a drainage basin in the north west of the site, a swale which traverses the central green corridor and a number of swales adjacent to the internal road network. It is envisaged the drainage features will be incorporated as part of the public open space provision, creating multi-functional green spaces that include active travel route, to the benefit of future residents.
- 4.5 Building design is modern and contemporary, reinterpreting the language of the adjoining dwellings to produce its own unique character. The appearance of the proposed buildings derives from a

straightforward contemporary reinterpretation of familiar forms, using traditional materials and construction technology.

- 4.6 The architectural language is at once contemporary and familiar and, married with robust, high-quality materials, is designed to deliver safe, attractive and sustainable new neighbourhoods that will not only complement the place-making aspirations of the layout, but which will create a diverse, affordable yet aspirational places in which to live. In terms of building height, the proposed houses will be up to 2 storeys in height, whilst the apartment blocks will be up to 3 storeys in height. The illustrative layout highlights how differing house types are positioned together throughout the site, producing a mixture of accommodation types, which should contribute towards creating balanced communities.
- 4.7 Site vehicular access/egress is provided at two main entrance points, from Cae Morfa in the north east of the site, and from Crymlyn Parc in the south west of the site. An internal road network will provide access to individual dwellings. The new roads proposed in the scheme are all to be designed to adoptable standards with a clearly defined hierarchy. The proposed car parking provision is in line with the adopted Parking Standards SPG. Dwellings will be served either by on-plot private driveways or communal shared parking areas/courts.

5.0 Planning Policy Context

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that: "If regard is to be had to the Development Plan for any purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the Plan unless material considerations indicate otherwise".
- 5.2 The development plan that encompasses the application site is the Neath Port Talbot Local Development Plan 2011 – 2026, adopted January 2016. Material considerations at a local level also include the relevant Supplementary Planning Guidance. Material considerations at a national level include Planning Policy Wales Edition 12 (February 2024), and the appropriate Technical Advice Notes (TANs).
- 5.3 Section 38(4) of the PCPA 2004 (as amended) states that: "For the purposes of any area in Wales the development plan is: (a) the National Development Framework for Wales, (b) the strategic development plan for any strategic planning area that includes all or part of that area, and (c) the local development plan for that area". Accordingly, the policies of relevance contained within the National Development Framework Future Wales: The National Plan 2040 and the adopted LDP are now discussed.

Future Wales: The National Plan 2040

- 5.4 Future Wales is the highest tier of development plan in Wales. It is focused on solutions to issues and challenges at a national scale. Its strategic nature means it does not allocate development to all parts of Wales, nor does it include policies on all land uses. Nevertheless, planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.
- 5.5 Under Policy 1 the Welsh Government supports sustainable growth in all parts of Wales. The subject site is situated within the Swansea Bay and Llanelli National Growth Area, where employment, housing opportunities and investment in infrastructure will be directed.
- 5.6 Policy 28 – National Growth Area – Swansea Bay and Llanelli indicates Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. The NGA is recognised as the focus for strategic economic and housing growth, essential services and facilities, alongside transport infrastructure.

- 5.7 The LDP Proposals Map indicates the subject site is located within the defined settlement boundary, as set out under **Policy SC 1 'Settlement Limits'**, which states: *"Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle."*
- 5.8 Regarding larger developments, the supporting policy text of Policy SC 1 states: *"larger scale proposals, such as 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."*
- 5.9 Furthermore, regarding the function of the settlement boundary, the supporting text states: *"they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the strategy."*
- 5.10 Within the settlement hierarchy for Neath Port Talbot under **Policy SP 3 'Sustainable Communities'** identifies Skewen as a 'district centre' with a defined role and function as a "Settlements with good transport links and a wide range of functions serving the immediate and surrounding communities".
- 5.11 Further, **Policy SP 3 'Sustainable Communities'** states: *"The delivery of sustainable, healthy and cohesive communities and the conservation of the countryside will be promoted by:*
1. *Defining sustainable communities and locations for development by the identification of a settlement hierarchy that reflects the role and function of settlements;*
 2. *Defining settlement limits within which development which accords with the settlement hierarchy will be permitted in principle;*
 3. *Resisting inappropriate development outside settlement limits."*
- 5.12 The justifying policy text indicates *"The analysis provided the evidence for defining a Settlement Hierarchy, that identifies those areas which are the most sustainable locations and can more appropriately accommodate growth in terms of their function"*.
- 5.13 The Proposals Map indicates the application site is allocated for residential uses under **Policy H 1 'Housing Sites'** which identifies the application site under reference H1/9 Crymlyn Grove (Phase 3); capable of accommodating an estimated 150 residential units over a site area of 5.6 Ha.

- 5.14 The Proposals Map specifies that the application site is located within the Coastal Corridor Strategy Area and is therefore subject to **Policy SP 5 'Development in the Coastal Corridor Strategy Area'**, which states: *"In the Coastal Corridor Strategy Area, sustainable growth and development will be promoted to benefit the County Borough as a whole, while protecting and enhancing the area's character and environment. This will be achieved through the following area-specific measures: (inter alia)*
1. *Making provision for the majority of new residential development along the coastal corridor"*
- 5.15 In addition to the policies identified by the Proposals Map, it is envisaged the following policies will be of primary relevance to the development proposals.
- 5.16 **Policy SP 7 Housing Requirement** states *"In order to deliver the 7,800 new dwellings required to meet the economic-led growth strategy, provision will be made for the development of 8,760 additional dwellings between 2011-2026 including a 12.31% flexibility allowance"*.
- 5.17 **Policy SP 8 Affordable Housing** states *"Provision will be made to deliver 1,200 affordable housing units within Neath Port Talbot over the Plan period (2011-2026) through the following measures:*
1. *Setting thresholds and targets requiring housing developments to contribute to affordable housing provision; and*
 2. *Providing a framework for determining affordable housing exception sites."*
- 5.18 **Policy AH 1 Affordable Housing** indicates *"all new housing developments, including conversions, on sites accommodating 3 or more units will be required to contribute to affordable housing provision. Affordable Housing Percentage Targets will be sought in the following spatial areas. Coastal Corridor: Neath - 25%".*
- 5.19 Further, *"The exact affordable housing contribution to be provided will depend on the circumstances of each proposal and the viability of the scheme. The provision of affordable housing will be implemented through the use of planning conditions, obligations and/or legal agreements between the Council, Developers and Registered Social Landlords."*
- 5.20 In addition to the policies outlined above, the following policies are of relevance to the proposals.

Policy Reference	Relating to...
<i>Overarching Policies</i>	
SP 1	Climate Change
SP 2	Health
SP 4	Infrastructure
SP 10	Open Space
SP 15	Biodiversity & Geodiversity
SP 16	Environmental Protection
Policy I 1	Infrastructure Requirements
<i>Topic Based Policies</i>	
EN 7	Important Natural Features
EN 8	Pollution & Land Stability
W 3	Waste Management in New Development
TR 2	Design & Access of New Development
BE 1	Design
OS 1	Open Space Provision
M2/1	Surface Coal Operations

Supplementary Planning Guidance

5.21 Supplementary Planning Guidance (SPG) is produced to provide further detail on certain policies and proposals contained within the Neath Port Talbot Local Development Plan (LDP). SPG do not have the same status as adopted development plan policies, however, they may form a material consideration in determining planning applications. The following SPG have been adopted:

- Planning Obligations - 2016
- Affordable Housing - 2016
- Parking Standards – 2016
- Biodiversity and Geodiversity – 2016
- Pollution – 2016
- Design – 2017

Planning Policy Wales Edition 12

5.22 In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, 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”.

5.23 PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of ‘placemaking’ should be at the heart of the planning system. It is stated at Paragraph 2.8 that development

proposals “must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act’s Sustainable Development Principle”. Paragraph 2.9 goes on to clarify that “The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making”.

- 5.24 PPW defines placemaking 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”.

Technical Advice Notes

- 5.25 In addition to the national policy guidance set out above, Technical Advice Notes (TANs) are land-use planning guidance documents issued by the Welsh Government to provide practical advice and guidance on areas of policy set out in Planning Policy Wales. TANs of relevance to the proposed development include:

- TAN 2: Planning & Affordable Housing
- TAN 5: Nature Conservation and Planning
- TAN 10: Trees
- TAN 11: Noise
- TAN 12: Design
- TAN 15: Development & Flood Risk
- TAN 16: Sport, recreation and open space
- TAN 18: Transport
- TAN 23: Economic Development

6.0 Key Planning Considerations

6.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- Principle of Development
- Sustainability
- Design
- Affordable Housing
- Residential Amenity & Noise
- Transport
- Trees
- Drainage
- Ground Conditions
- Ecology & Biodiversity
- Green Infrastructure & Landscaping
- Air Quality
- Waste Management

Principle of Development

6.2 As highlighted in the preceding Planning Policy Context Section, the application site is allocated for residential development under Policy H1 'Housing Sites' which identifies the application site under reference H1/9 Crymlyn Grove (Phase 3) – thus establishing the principle for residential development at the application site.

6.3 In addition to its allocation for residential purposes, the application site is located within the settlement limit as defined by Policy SC 1 Settlement Limits, which indicates that development within settlement limits that is proportionate in scale and form to the role and function of the settlement will be acceptable in principle. Policy SP 3 indicates the delivery of sustainable communities will be achieved by directing development towards locations defined within the Settlement Hierarchy. The application site is located within Skewen, identified as a 'district centre' at the upper end of the settlement hierarchy, which are defined as *"settlements with good transport links and a wide range of functions serving the immediate and surrounding communities"*.

6.4 It is considered the scale of the proposals corresponds with the role of the settlement and therefore adheres to Policy SP3, which confirms *"development which accords with the settlement hierarchy will be permitted in principle"*.

- 6.5 Additionally, the site is located within the Coastal Corridor Strategy Area, where sustainable growth and development will be promoted to benefit the County Borough. The Strategy Area should protect and enhance the area's character and environment, whilst making provision for the majority of new residential development.
- 6.6 In summary we believe the principle for residential development has been robustly established at the subject site, given its allocation for residential purposes, alongside its location within the defined settlement boundary of Skewen, and within the Coastal Corridor Strategy Area. The principle of development is therefore in concurrence with Policy H 1 'Housing Sites', Policy SC 1 'Settlement Limits', Policy SP 3 'Sustainable Communities' & Policy SP 5 'Development in the Coastal Corridor Strategy Area'.

Sustainability

- 6.7 An overview of the subject site's sustainability credentials draws similarities to the preceding 'principle of development' section. The subject site is situated within the settlement boundary and the Coastal Corridor Strategy Area – demonstrating its sustainability credentials. The allocation for residential purposes indicates that the site passed through the sustainability appraisal as part of the Local Development Plan preparation process, thus confirming the site's sustainability credentials.
- 6.8 As highlighted above, the application site fully adheres to Policy SP 3 'Sustainable Communities' which seeks to deliver sustainable, healthy and cohesive communities. The scale of the proposal is commensurate to the role and function of the settlement in which it is located. In this regard, compliance with Policy SP 3 demonstrates the inherently sustainable status of the site.
- 6.9 The site benefits from excellent linkages to surrounding infrastructure, with the potential to connect to existing pedestrian footpath routes in the locality, presenting opportunities for increased active travel. As noted above, Skewen district centre is located approximately 1.45 km west, which includes Skewen train station, providing access to services to Swansea, Neath, Port Talbot, Bridgend & Cardiff. A range of services can be found in Skewen, including primary school, shops, cafes, restaurants, places of worship, public open space, doctor's surgery and public house. The nearest bus stop is at Crymlyn Parc approximately 350 metres east of the site, providing access to the 155 Llandarcy – Neath service.
- 6.10 To summarise, the location of the subject site allows sustainable modes of transport to be considered a viable alternative to private vehicles –

therefore contributing towards achieving the modal shift in transport habits.

Design

- 6.11 An overview of the scheme's design credentials are provided in accompanying Design & Access Statement prepared by Spring Design. The DAS illustrates how the design concept of the scheme has evolved as the plans have progressed. In respect of layout and scale, the proposed layout has been designed following an extensive review of the surrounding area. The layout utilises a mix of apartments and houses that are designed to respect the location of the site. The form of the layout, using semidetached and terraced dwellings in a linear format, also reflects the prevailing character of the area.
- 6.12 The appearance of the proposed buildings derives from a straightforward contemporary reinterpretation of familiar forms, using traditional materials and construction technology. The architectural language is at once contemporary and familiar and, married with robust, high-quality materials, is designed to deliver safe, attractive and sustainable new neighbourhoods that will not only complement the place-making aspirations of the layout, but which will create a diverse, affordable yet aspirational places in which to live.
- 6.13 The development pattern of the proposals ensures continuity of enclosure, active frontages and legibility, which will contribute to a safer built environment.
- 6.14 Front doors are clearly legible and the external areas leading to them are clearly defined. In addition to clearly defining the distinction between public and private realms - and therefore reducing potential conflicts in uses - these features will provide defensible space and will promote a sense of ownership and responsibility.
- 6.15 Adequate lighting will be installed where required, whilst the orientation of the dwellings means that parking areas will benefit from natural surveillance to protect people and property by contributing to the safety of public spaces and routes.
- 6.16 Natural surveillance of the proposed open space areas will be provided by ensuring that houses overlook these areas. The proposals will achieve Secured By Design Gold Standards.
- 6.17 To summarise, the proposal demonstrates compliance with Policy BE 1 Design of the adopted LDP.

Affordable Housing

- 6.18 The proposed development will contribute towards the Affordable Housing target as set out under Policy SP 8 to deliver 1,200 affordable homes over the plan period. Policy AH 1 'Affordable Housing' indicates the affordable housing target is set at 25% (Coastal Corridor – Neath). The proposed development will provide in excess of the required affordable housing provision utilising a balanced mix of shared ownership, intermediate rent and social rent tenures. This ensures a well-balanced community.

Residential Amenity & Noise

- 6.19 A Noise Impact Assessment has been prepared by Acoustic Consultants in support of the application submission. The assessment takes into consideration the local authority requirements and considers the impact of road traffic noise from the M4 motorway, train noise from the rail line to the north and the nearby operational farm to the west of the site.
- 6.20 A long-term noise monitoring exercise was undertaken at two locations between 14:00 hours on the 30th of March and 11:00 hours on the 1st of April 2021. The main noise affecting the whole site was determined to be road traffic noise from the M4. Train events were audible at the nearest boundary, and were not considered overbearing once background noise was considered.
- 6.21 The dominant noise source across the site is road traffic emanating from the M4. The site falls into NEC B which therefore requires noise mitigation measures to the building façade construction, namely external walls, windows and ventilation to habitable rooms, to ensure an adequate level of protection.
- 6.22 With the noted building fabric construction, and suitable ventilation provisions as stated above, the predicted internal noise levels within the proposed dwellings from both road traffic and rail noise are easily within the criteria of British Standard 8233:2014 of 35 dB LAeq (16 hour) in the daytime rooms, and 30 dB LAeq (8 hour) and 45 dB LAmax(F) in the night-time rooms.
- 6.23 As such the external noise would be considered to be suitably controlled within the habitable rooms of the proposed residential development and good internal conditions can be achieved. The noise map predictions provided in the acoustic report also indicate that noise levels in amenity spaces fall within the upper guideline value of BS8233 and are therefore acceptable.

- 6.24 The noise report has assessed farmyard tractor noise using previously measured library data, and measured background noise data from the site survey. This has been used to inform an assessment to BS4142 at the nearest sensitive receivers to the farm access track. The daytime specific noise level of tractor movements falls below the background noise levels of the area and therefore the impact is considered to be low. The night-time specific noise level of tractor movements marginally exceeds the measured background by 2 decibels.
- 6.25 When considering all the contextual matters with regards to the farmyard tractor operations, the noise report considers that the initial assessment of adverse impact can be revised by adopting appropriate internal noise criteria, particularly for the night time when occupants are more vulnerable to disturbance.
- 6.26 It is considered that with the building mitigation measures installed as detailed above, noise from the tractor movements would be sufficiently reduced internally to the habitable rooms.
- 6.27 In terms of environmental noise, the noise report considers that acceptable conditions can be achieved within the dwellings on the site as long as the noise control measures noted are followed.

Transport

- 6.28 A Transport Assessment has been prepared by Acstro in support of the proposals, and considers the transport implications of the proposed development. It demonstrates that the site is in a sustainable location that is closely related to existing facilities and services and is accessible to pedestrians, cyclists and public transport users. It is also demonstrated that safe vehicular access to the site can be provided and adequate parking provision is made for the future occupiers and users of the site. The Statement provides the following findings and recommendations:
- The site is in a sustainable and accessible location. The site is accessible to pedestrians, cyclists and public transport users. This increases the possibility that journeys generated by the development can be made by sustainable forms of transport.
 - There is a good range of services and facilities that cater for the day-to-day needs of future residents of the site available within reach by sustainable methods of travel. This reduces the need to travel by car and ensures that future residents without access to cars are not socially excluded.
 - The site benefits from a safe means of access.
 - The site will be served by an adoptable network of streets. Off-street parking is provided for each property and accords

with the adopted Parking Standards. Visitor parking will be accommodated within the street.

- The estimated traffic generation of the proposed development is insignificant and will cause no detrimental impact to the continued safe operation of the surrounding highway network.

6.29 It is therefore considered that the application site meets planning policy requirements in terms of being in an appropriate location that is safely accessible by all forms of transport and that the impacts of the development on the continued operation and safety of the surrounding highway network would be acceptable.

6.30 On this basis, it is concluded therefore that there are no transport related issues that should prevent planning permission for the proposed development from being granted.

Trees

6.31 A Tree Report has been prepared by ArbTS in support of the application submission. This includes a tree survey, tree constraints plan, arboricultural impact assessment (AIA), tree protection plan and arboricultural method statement.

6.32 In respect of tree & hedgerow loss, the AIA classifies this as low/moderate. Tree loss is summarised as:

- T1 – Oak – Moderate quality (category B): T1 is a mature boundary oak tree that is assessed to be at the lower end of the B category classification. This is because it has been repeatedly pruned back from the above electrical lines and has some internal decay of the main trunk. T1 is to be removed to create one access point into the site as defined in the adopted LDP where two access points are required.
- T11 – Small Silver Birch – Low quality (category C)
- T6 – Small Oak – Low quality (category C)

6.33 Overall tree loss is summarised as three trees being identified for removal to facilitate the construction of the proposed development design. Two of these trees identified for removal are low-quality trees (C Category). These trees should not present a constraint on developing the site. The removal of one moderate quality tree (B Category – T1) can be readily mitigated by suitable compensatory tree planting within the site. The AIA indicates the following hedgerow loss:

- Hedgerow H1 – length 17 metres – low quality (category C)
- Hedgerow H2 – length 3 metres – poor quality (category U)

- Hedgerow H3 – length 9 metres – low quality (category C)

- 6.34 The impact upon the Root Protection Area is categorised as low. RPA potential damage can be managed through the installation of tree protective fencing, arboricultural watching brief for excavation works within the RPA, and installation of Cellweb, as designed by an Arboriculturist will ensure no significant long-term adverse impact will occur to any of the retained trees.
- 6.35 The impact of tree surgery work is categorised as low. Some branch reduction/branch pruning work will be required to facilitate this proposed scheme, as detailed in the tree protection plan. The work will be carried out to British Standard 3998:2010 tree work recommendations. Adhering to this standard will ensure no adverse impact on the tree longer term health or visual amenity.
- 6.36 The impact upon future tree pressures is assessed as low. Overall, the design has considered the size and value of trees on the site to minimise any future pressures to heavily prune or fell the higher-value trees.
- 6.37 The AIA concludes that overall impact is categorised as low. The site has several arboricultural constraints that must be considered in the development design phase. Three trees have been identified as being removed to facilitate the construction of the proposed development. Two of the trees identified for removal are low-quality trees (category C). These trees should not present a constraint on the development of the site. The removal of a single moderate quality tree (T1 – category B) can be readily mitigated by suitable compensatory tree planting within the site.
- 6.38 The construction of the proposed development, whilst complying with the tree protection scheme as detailed in Section 6 of the AIA, will ensure that no significant long-term adverse arboricultural impact occurs on the health of any retained trees on or adjacent to this site of the long-term amenity of the area.

Drainage

- 6.39 The Flood and Water Management Act 2010 (Schedule 3) establishes SABs in County Councils and requires new developments to include Sustainable Drainage Systems (SuDS) features that comply with national standards.
- 6.40 All new developments of more than 1 dwelling house or where construction is 100m² or more will need to submit a SuDS application

demonstrating compliance with the statutory SuDS standards for the design, construction, operation and maintenance of surface water drainage systems serving new developments. As such, the proposals must demonstrate how it will ensure that the SuDS standards are adhered to.

- 6.41 A Drainage Strategy Report has been prepared by CB3 Consult in support of the proposals, demonstrating how the development utilises the Sustainable Drainage features in the conveyance of surface water.

Ground Conditions

- 6.42 A Geotechnical & Geoenvironmental Report and additional Human Health Risk Assessment Addendum have been prepared by Terra Firma in support of the development proposals. A summary of the Report is provided under topical headings, as follows.

Site History

- 6.43 The site has been occupied by three fields since the earliest map researched. The site has been located within proximity of roads, houses, and railway lines. A landfill replaced a railway line 20m north of the site.

Geology

- 6.44 The site is underlain by Hughes Member bedrock of the Pennant Sandstone Formation. Superficial deposits are recorded as Till at the north of the site.

Radon

- 6.45 No radon protective measures are required for new developments on the investigation site.

Coal Mining Risk Assessment

- 6.46 It is considered that there is an insignificant risk to the site from past shallow coal mining.

Ground Conditions

Depth	Thickness	Stratum
0.00 - 0.1/0.4	0.1/0.3	Grass over brown organic-rich sandy slightly gravelly CLAY with some root-lets.
0.1/0.3 – 0.5/1.4	Absent/1.2	Soft to firm orangish brown and brown mottled grey sandy slightly gravelly

		CLAY/ medium dense orangish brown clayey gravelly SAND with variable cobble and boulder content.
0.5/1.4 – 0.7/>2.25	Absent/>1.65	Medium dense to dense grey and brown clayey/silty sandy GRAVEL/clayey/silty gravelly SAND with variable cobble and boulder content.
0.45/>2.25 - >0.9/>2.25	-	Recovered as very dense grey sandy GRAVEL with cobble content. POSSIBLE SANDSTONE BEDROCK

Contamination of Concern

- 6.47 Concentrations of arsenic have been recorded above the generic threshold value in nine of the nineteen samples tested. All the elevated concentrations were recorded within the brown organic-rich sandy slightly gravelly CLAY with some rootlets that covers the surface of the site. It is recommended that a more detailed analysis of the soil should take place to calculate a site-specific assessment criterion for arsenic.
- 6.48 Alternatively, to protect future site users from the identified contamination either the site will need to be capped, or the affected soils could be removed from site and disposed of at a suitably licenced landfill site. If the site is capped, the capping will consist of the proposed buildings and hard standings, and in garden and soft landscaped areas the capping should consist of 600mm of suitable inert topsoil, and subsoil if desired.

Preliminary Ground Gas Risk Assessment

- 6.49 Following one of three proposed gas monitoring rounds, the site is preliminarily classified as 'Gas Characteristic Situation 1' (CS1).

Foundation Solution

- 6.50 It is recommended that mass concrete strip or trench fill foundations be used; founded within the medium dense to dense grey and brown clayey/silty sandy GRAVEL/clayey/silty gravelly SAND with variable cobble and boulder content. at an approximate depth of 0.5m to 1.4m below the existing ground level. An allowable bearing pressure of 100kN/m² may be used for strips up to 750mm wide.
- 6.51 Alternatively, where shallow bedrock is encountered, mass concrete strip or trench fill foundations be used from a depth ranging between 0.45m and more than 2.25m. If any part of the foundation is founded within the bedrock, all of the foundation must be founded within the bedrock to prevent excessive differential settlement. If founding in the sandstone bedrock, an allowable bearing pressure of 150kN/m² may

be used for strips up to 750mm wide. Foundations must sit at least 200mm within the founding horizon. For the given foundation solutions and bearing pressure, maximum total settlements of 25mm should result with differential movements of the superstructure not exceeding 1:750.

- 6.52 The Human Health Risk Assessment Addendum finds that based upon the historical review of the site, which indicates that the site has been used for farming throughout its history, it is considered that there are unlikely to be any hotspots of contamination on site, or more specifically within the soil in question. The elevated concentrations encountered in the soil will have resulted from fallout from historical smelting of metals in the local area.
- 6.53 The site-specific human health risk assessment demonstrates that the shallow natural soils are suitable for its intended use and that no capping of the garden areas will be necessary for the proposed development.

Ecology & Biodiversity

- 6.54 A Preliminary Ecological Appraisal has been prepared by Hawkeswood Ecology in support of the development proposals. The Appraisal provides the following findings and recommendations:
- The Site consists of agriculturally modified species poor grassland that is grazed by sheep, cattle and donkeys, separated by unmanaged derelict hedgerows.
 - It is bounded to the north by an area of bramble and tall herb developed on a disused railway line and the M4.
 - The development Site supports no significant botanical interest. The fields are heavily grazed, but the cattle and donkey grazed fields are less poached than in the previous study. Mature trees on the field boundaries offer opportunities for breeding birds and potentially roosting bats. However an updated Ground Level Tree Assessment and climbing survey did not find trees of high value potential for roosting bats.
 - The proposed development will impact mainly upon the agriculturally modified grassland which is of low species diversity and to a lesser extent the derelict hedgerows. It is recommended that the hedgerows are to be retained, and if so it is considered that the development is likely to have little impact upon species currently using the Site.
 - Japanese knotweed is present on land immediately adjacent to the north. Restrictions on access into that off-Site area will

be enacted to prevent accidental spread of this invasive and proscribed species.

- The current field boundaries will be retained and improved by planting up gaps wherever possible. Increasing the biodiversity value of the retained sections is discussed below.
- Integral bat and bird boxes will be used in the new construction. Bat tubes will be located on buildings near the Site boundaries, particularly adjacent to northern boundary, and bird boxes, in particular swift and house sparrow boxes on a number of houses throughout the development. Typical examples are shown in Figure 3. The locations of bat and bird mitigation will be such that they are not vulnerable to attack from cats and are free from human interference.
- A number of recommendations are made in Section 8 which if implemented will lead to an overall Net Benefit for Biodiversity at a local Site level and with connections to the wider landscape retained and improved may have benefits outside the immediate Site environment.

6.55 In respect of opportunities to increase the biodiversity value of the site, the Appraisal provides the following recommendations:

- Beating up the existing field boundaries and hedge lines using native trees and shrubs of local provenance and reflecting the species already present;
- Introducing a wild meadow mix along the retained hedgerow running north-south across the Site, mixes for consideration include Emorsgate EM1, a basic general-purpose mix and EM4, a meadow mixture for clay soils. Both mixes are complete mixes with grass and wild flower species. They include species that are favourable to pollinators, increasing populations of invertebrates and higher animals offering an ecosystem of both prey and predator species.
- Development of SUDs basin for biodiversity including possible use of wet meadow seed mixtures (EM8) and plug planting.
- Any formal landscaping plan will be based on native species reflecting those present in the local area (all native species should be of local provenance) or species with known value to British wildlife. Plantings should include species known to be valuable to foraging birds and bats such as those producing berries and attractive to insects, i.e. Swedish whitebeam, hawthorn, pyracantha and hazel.
- Retained habitat improvements will introduce a complex structure offering differences in height throughout, this is im-

portant to increase biodiversity at all levels as different animals are supported by differing niches based on both height and spread of plant species;

- Ensuring all retained habitats on-Site are connected to off-Site areas, i.e. linking the retained open space to the northern boundary which in turn links to the motorway and rail network.

6.56 The Appraisal concludes that there are no apparent overriding ecological reasons that would prevent the proposal proceeding, recommendations to enhance biodiversity are made within the report.

Green Infrastructure & Landscaping

6.57 A Green Infrastructure Statement has been prepared by Tir Collective in support of the proposals and provides the following findings and recommendations:

- The landscape proposals Crymlyn Parc, Skewen are based on a Stepwise Approach, and given the importance of existing green infrastructure at the site, the strategy was to avoid and retain wherever possible. Where green infrastructure features have been lost the design has mitigated and/or compensated for the loss and enhanced the green infrastructure overall.
- The proposals aim to create a hierarchy of spaces focused around existing and proposed green infrastructure. Naturalistic green spaces provide a setting for the development with space for landscape-based play and walking within green spaces which encourage social interaction.
- SuDS features are integrated into the landscape strategy, introducing flowering pollinator species to provide a source of nectar for bees and other insects.
- The landscape proposals make a good contribution towards the strategy aims defined against the landscape concept themes for the project defined on Page 12. The strategy aims are:
 - Retain existing trees wherever possible and avoid removal of higher quality, A and B Category trees, and supplement with new native planting of Welsh provenance.
 - Create green corridors along retained vegetation with active travel, SuDS, habitats, play and edible landscapes.
 - Establish strong connectivity across the site for people and nature.

- Focus on habitat enhancements which improve species and age diversity to improve longevity and resilience to climate change.
- Planting and grasslands to be designed to work with nature, based on lower future maintenance requirements.
- Integrate SuDS features as part of landscape proposals to improve amenity value.
- Establish a setting for informal play and landscape based exercise which is attractive and provides interaction with nature.
- Create a landscape that changes with the seasons to increase amenity and reinforce a connection with nature.
- With regards to the Placemaking Wales Charter the landscape proposals make a good contribution towards the six placemaking principles, which cover the range of considerations that contribute to establishing and maintaining good places.
- The proposals also contribute well to the 12 Standards of Building with Nature, creating well connected, multifunctional green infrastructure.

6.58 In summary, the Green Infrastructure Statement finds that the proposed development would be in accordance with the Neath Port Talbot Local Development Plan policies relating to Green Infrastructure.

Air Quality

6.59 An Air Quality Assessment has been prepared by Air Pollution Services in support of the application submission.

6.60 In doing so the air quality impacts of the Proposed Development have been assessed. Given that the proposed development's trip generation is above the screening criteria set out in the EPUK/IAQM guidance (2017) it was necessary to conduct a detailed assessment. A detailed assessment of combustion plant impacts on air quality was screened out as no centralised combustion plant is expected to be used.

6.61 The baseline review of air quality did not show any exceedance of the annual mean NO₂ AQO (40 µg/m³) in 2022. The Council does not operate any PM monitoring sites representative of conditions at the Application Site.

6.62 The construction works have the potential to create dust and emissions. During construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emission. With

these measures in place, it is expected that any residual effects will be 'not significant'.

- 6.63 The Proposed Development is not expected to worsen the air quality in the local area, with all pollutant concentrations below the respective AQOs and LVs. Thus, all changes in pollutant concentrations are described as '*negligible*'.
- 6.64 Air quality for future users of the Proposed Development, at all relevant locations of sensitive air quality exposure, has been demonstrated to be acceptable, with concentrations below the regulatory standards at relevant exposure throughout the Proposed Development.
- 6.65 The Proposed Development complies with the requirements of the NPTC Local Development Plan 2011 – 2026, specifically Policy SP 16 and Policy EN8 and in consideration of the Pollution Supplementary Planning Guidance (SPG). Overall, based on the results of the air quality assessment, the air quality effects are compliant with all regulatory standards and are judged to be 'not significant'. Thus, the site is considered suitable for the proposed end use in terms of air quality impacts.

7.0 Conclusion

7.1 This Planning Statement has provided the policy justification in support of an outline planning application to be submitted to Neath Port Talbot County Borough Council for the proposed development of up to 153 no. homes with all matters reserved at Land North of Crymlyn Parc, Skewen, Neath.

7.2 This Planning Statement has sought to address the pre-application advice provided by the LPA and demonstrates how the proposal represents a policy compliant scheme. In summary, the Planning Statement makes the following pertinent points:

- The application site is allocated for residential development under Policy H1 'Housing Sites' which identifies the application site under reference H1/9 Crymlyn Grove (Phase 3) – thus establishing the principle for residential development at the application site.
- In summary we believe the principle for residential development has been robustly established at the subject site, given its allocation for residential purposes, alongside its location within the defined settlement boundary of Skewen, and within the Coastal Corridor Strategy Area. The principle of development is therefore in concurrence with Policy H 1 'Housing Sites', Policy SC 1 'Settlement Limits', Policy SP 3 'Sustainable Communities' & Policy SP 5 'Development in the Coastal Corridor Strategy Area'.
- An overview of the subject site's sustainability credentials draws similarities to the findings of the 'principle of development' section. The subject site is situated within the settlement boundary and the Coastal Corridor Strategy Area – demonstrating its sustainability credentials. The allocation for residential purposes indicates that the site passed through the sustainability appraisal as part of the Local Development Plan preparation process, thus confirming the site's sustainability credentials.
- The proposed development can be considered highly sustainable, in accordance with both local and national level planning policy.
- The design of the proposal responds to the context of the site and the surrounding area, The proposal demonstrates compliance with Policy BE 1 Design of the adopted LDP.
- In addition to the key points addressed above, the scheme demonstrate compliance with all other material considerations including; highways & access, transport, design & parking

7.3 To conclude, we believe the proposals represent a policy compliant scheme when considered against the relevant local and national level planning policies. On this basis we politely request that the application be positively determined, and planning permission be granted without delay.