

Planning Statement

For a Change of Use and Conversion to Flats
96 Gnoll Park Road, Neath, SA11 3DD

PS-100

Date
29.10.2021

Revision
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1.0 Introduction

This Planning Statement is for the property 96 Gnoll Park Road, Neath, SA11 3DD. The postcode is within the Neath North ward/electoral division, which is in the UK Parliamentary Constituency of Neath. The local authority is Neath Port Talbot.

The proposal aims to reuse and rejuvenate the existing property and additional accommodation to be incorporated within the boundary demise. The vision is to make the former Neath Care more commercially viable and sustainable by converting it to self-contained flats. Every effort has been made to ensure this proposal has been informed by a thorough analysis of the site, to understand its constraints and opportunities.

The report is prepared in accordance with the following documents:

- *Neath Port Talbot's County Borough Council's Supplementary Guidance and Local Development Plan (2011-2026).*
- *Local Development Plan, 2011–2026, Design Supplementary Planning Guidance (2017)*
- The Town and Country Planning (GPDO) (Amendment) (Wales) Order 2009, No1024: Design and Access Statements: Wales
- The Town and Country Planning (GPDO) (Amendment) (Wales) Order 2008, No 2336:
- TAN 12: Design
- TAN 15: Development and Flood Risk
- TAN 21: Waste
- TAN 22: Planning for Sustainable Buildings
- *Beautiful Homes and Spaces*, July 2020

This document should be read in conjunction with the submitted planning application forms and planning documentation

- A1-001: Site & Location Plans
- A1-100: Existing Floor Plans
- A1-101: Existing Elevations
- A1-200: Proposed Floor Plans
- A1-201: Proposed Floor Plans Main Building
- A1-202: Proposed Plans Rear Building
- A1-203: Proposed Main + Rear Building Elevations
- A1-204: Proposed Landscape Plan & Proposed Site Section
- DAS-100: Design and Access Statement
- FRA-100: Flood Risk Assessment
- ES-100: Environmental Statement

1.1 Aim

The aim of this report is to investigate and evaluate the potential of the building and site. It sets out its brief history, its overall condition and significance, as well as the constraints and opportunities.

This proposal is to redevelop the existing property without compromising the street facing appearance and character of the building. Not only does it exemplify another variation of the types of facades along Gnoll Park Road, but keeps consistency with the neighbouring building

1.2 Application Site

The site covers an area of 0.247 acres / 999.6m² that is situated along Gnoll Park Road with Hibbert Road and Park Street on either side. The proposal site is approximately 500m from the town centre, 650m from Neath Train Station, 50m from the local rugby stadium and 100m from the local cricket pitch.

The area containing Gnoll Park Road, Neath, Wales consists predominantly of terraced housing, which is common in suburban and inner-city areas. The types of accommodation range from detached, semi-detached, terraced and purpose-built and converted flats.

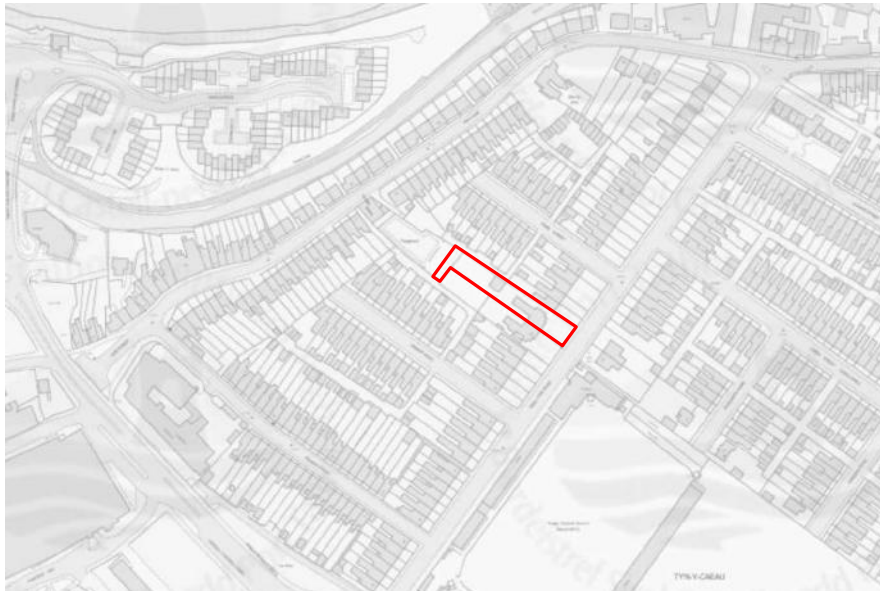


Figure 1 Application Site Plan ——— Extent of Site

1.3 Change of Use Class

The proposal aims to provide good-quality habitable accommodation. Hence, this proposal is applying to change its Use Class from B1 Business (Offices) in a residential area to C4 (Houses in multiple occupation).

2.0 Site Conditions

2.1 Location

96 Gnoll Park Road is located in Neath and situated with the following infrastructure connections:

- Gnoll Park Road forms part of the B4434 that leads from/to Neath town centre to the south to the A465 and Aberdulais to the north east.
- Neath itself is situated at the juncture of the A474 and A465 to the east of junction 43 of the M4 motorway which is within a few minutes' drive. It is within the Neath Port Talbot County Borough Council administrative area and has a population of circa 142906 (2018) and growing.
- Park View is located directly opposite the Neath Rugby Football Club on Gnoll Park Road and is less than a quarter of a mile from Neath Town Centre.

2.2 Surrounding Context

There are no statutory environmental designations within the site boundary, and Gnoll Park Road is not designated as a conservation area. Across the road from the proposal sits the local rugby stadium occupying around half the of the south-easterly side of Gnoll Park Road, and has a considerable dominant impact along the road.

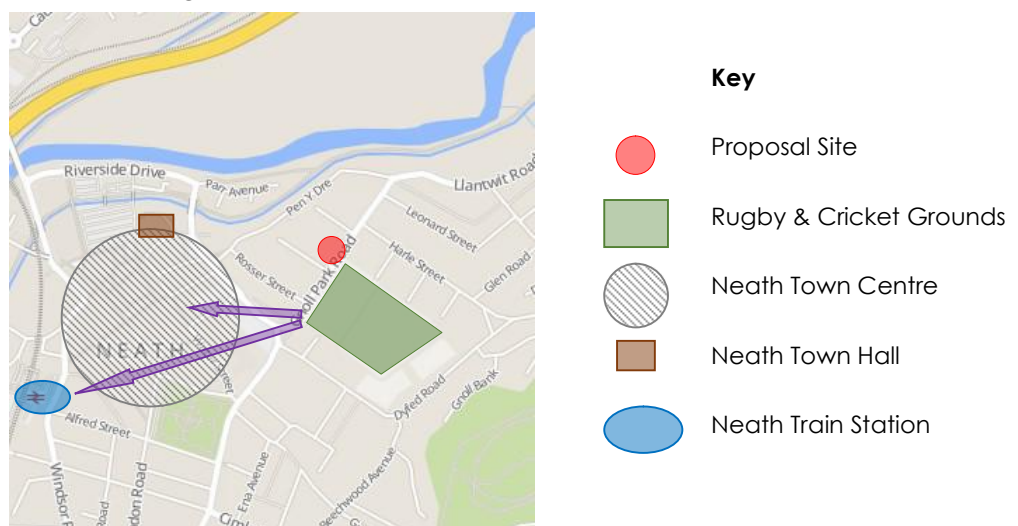


Figure 2 Proximity to Local Amenities from Proposal

2.3 Existing Site Access

Main access to the property remains unchanged by the development. The primary access will continue maintaining pedestrian and the drive off Gnoll Park Road. The secondary access points to the rear of the rear of the site is off Park Street and Hibbert Road.



Figure 3 Access Plan



Primary Access off Gnoll Park Road
Secondary Access off Hibbert Road
Secondary Access of Park Street

2.4 Existing Site Boundaries, Features and Topography

Limited impact will be made beyond the property boundary. The boundary demise is separated by an existing brick and concrete blockwork wall. It provides sufficient privacy and protection from outside the boundary. The site topography is generally level. The site extends from the front to back circa 90m with little obstructions. The back of the site is used as a car parking facility. As has 92-94 GPR, this proposal also utilises the external space to extend the property to the extent of the site without causing unnecessary obstructions.

2.5 Public Transportation

Due to the proposal's location to Neath Town Centre and other amenities, all intentions aim to utilise public transportation and walk. A public bus stop is located opposite the main entrances of the site, the table below highlights the nearest transport available from the 96 Gnoll Park Road, X7, T6 and 38 are few routes to the main location.

Route No.	Route Description
X7	Neath Port Talbot Principlega area
T6	Community Transport Swansea
38	Neath Abbey

Table 1 Local Bus Stops

3.0 Planning Policies

A Preplanning application, ref: Q2021/0133, was issued and all comments by the Planning Officer, Ms. Helen Bowen, 01.09.2021 were responded to in the accompanying DAS-100, Design and Access Statement. It should be noted that subsequent to reviewing the preplanning documentation, Ms. Bowen concluded the proposal was acceptable as stated in the comments:

"It is noted that the application site is located within settlement limits (as defined in Policy SC1 of the LDP). As such, the principle of the development is generally acceptable provided that the

development would comply with all other relevant Planning Policies, and there is no unacceptable impacts in terms of visual or residential amenity, biodiversity or highway safety."

Where applicable, additional information has been included within this application with responses to the Planning Officer's comments being addressed in the following sections:

Relevant Planning Policies

In addition to national guidance contained within Planning Policy Wales, the relevant policies would include:

Strategic Policies

- Policy SP3 Sustainable Communities
- Policy SP7 Housing Requirement
- Policy SP8 Affordable Housing
- Policy SP10 Open Space

Topic based Policies

- Policy SC1 Settlement limits
- Policy AH1 Affordable Housing
- Policy OS1 Open Space Provision
- Policy EN6 Important Biodiversity and Geodiversity Sites
- Policy TR2 Design and Access of New Development
- Policy BE1 Design

Supplementary Planning Guidance

The following SPG is of relevance to this application:

- Planning Obligations (October 2016)
- Parking Standards (October 2016)
- Affordable Housing (October 2016)
- Open Space & Greenspace (July 2017)
- Design (July 2017)

The following National Planning Policies, Wales, and Technical Advice Notes (TAN) have been reviewed and addressed within the development of this proposal:

- Neath Port Talbot's County Borough Council's *Supplementary Guidance and Local Development Plan* (2011-2026).
- *Planning Policy Wales*, Edition 11, 2021
- *Design Supplementary Planning Guidance* (2017)
- *Parking Supplementary Planning Guidance* (2016)
- The Town and Country Planning (GPDO) (Amendment) (Wales) Order 2008, No 2336:
- TAN 12: *Design*
- TAN 15: *Development and Flood Risk*
- TAN 21: *Waste*
- TAN 22: *Planning for Sustainable Buildings*
- TAN 6: *Planning for Sustainable Rural Communities*
- Llywodraeth Cymru/Welsh Government, *Beautiful Homes and Spaces*, July 2020

3.1 Policy Context

Planning Policy Wales (PPW) Edition 9 (2016)

PPW provides the overarching planning framework for sustainable development in Wales and supports the principles of the 'Well-being of Future Generations (Wales) Act 2015'. As one of the key factors in achieving sustainable development, good design can protect and enhance environmental quality; consider the impact of climate change; help to attract business and investment; promote social inclusion, and improve the quality of life.

The PPW defines Design as:

“the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.”

PPW emphasises that ‘...meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales, from the construction or alteration of individual buildings to larger development proposals.

PPW further stipulates that “Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers flexibility in use, and provides buildings and environments that are convenient and enjoyable to use for everyone.”

The proposal makes continuous reference to the aforementioned planning policies throughout its evolution and design massing and form, visual characteristics, and external landscape arrangement in relation to eth local context.

3.2 Five Objectives of Good Design

The diagram below, extracted from *Design Supplementary Planning Guidance*, summarises the five objectives of good design:

- | | | |
|---------------------------------|--------------|---------------------|
| 1. Access | 2. Character | 3. Community Safety |
| 4. Environmental Sustainability | 5. Movement | |



Figure 4 Objectives of Good Design

The proposal demonstrates that every effort has been made to address the following factors that determine good design that adds housing stock through diversity into the local community:

- a) Any proposal that would include new construction or alteration to an existing building's appearance should be well designed. This will include whether it has:
- b) paid sufficient regard to the character of the area, and to conserve biodiversity and strengthen habitat connectivity;
- c) ensured that its design and operation would not have any unsatisfactory impacts on the occupants of any other properties (including proposals with the benefit of planning permission);
- d) taken sufficient regard of the need to address climate change and sustainability issues;
- e) incorporated good design that addresses the safety and security of people and property, and reduces the opportunities for crime. In assessing development proposals particular attention should be paid towards:
 - (i) natural surveillance of public spaces from existing or proposed development;
 - (ii) the location of footpaths and access points;
 - (iii) secure locations for any associated car and cycle parking;
 - (iv) satisfactory lighting;
 - (v) provision of CCTV, where the proposal would contribute to a significant increase in traffic or pedestrian activity.

3.3 Supplementary Planning Guidance: Design

Criterion 1: *'It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment'.*

Creation of Character - Diversity and Choice

4.1.1 The character of a development can affect how it is perceived, and affect how people use and respond to it. This character can be respectful of the existing local area, or respond in a more individual or distinctive way. Dependant on the scale of the development proposed it can also provide distinctive character areas that respond to both the local context or specific uses or requirements. This can be influenced by the locality's position in the place/movement hierarchy ⁽⁵⁾ and in detailed design matters such as building lines, scale, density and massing of buildings, and the enclosure of spaces.

This proposal aims to show that every effort has been made responding and respecting the characteristics of the local area. Hence, from the visual assessment of the neighbouring properties along Gnoll Park Road, DS-100, *Figure 4 Location of Dwellings along Gnoll Park Road Denoting Form and External Materials*, the study investigated the types of massing, density, forms and materials that showed the palette of external finishes, colours and classification of properties.

4.1.2 Formal and informal spaces can be created through a variation in all of these providing visual interest and legibility. Key junctions and buildings can be identified to provide 'way-markers' within sites. On smaller more self-contained sites, a specific character can provide a distinctive environment and create places of genuine quality and visual interest.

The proposal aims to establish external spaces through a variation providing visual interest and legibility. Key junctions and buildings will be identified as 'way-markers' within sites. Smaller more self-contained sites, as this application, *a specific character can provide a distinctive environment and create places of genuine quality and visual interest*

4.1.3 The Council seeks to ensure that sites provide a distinctiveness that allows innovation and quality to be provided within the public realm and design of the buildings themselves, rather than a uniformity of house type and character that could be 'anywhere'.

From the above guidance, and analysis of the local aesthetics, it is apparent there is scope to utilise aspects of the context, and through interpretation, the proposal can establish a distinctive environment to create a place of quality and visual attention. These relate to siting, appearance, scale, height, massing and elevation treatment.

3.4 Pre-Planning Response and Advice: Q2021/0133

The following information addresses the proactive comments discussed with the Planning Officer, Ms. Helen Bowen, ref: Q2021/0133, 01.09.2021. Subsequent to reviewing the preplanning documentation, Ms. Bowen concluded the proposal was acceptable as stated in the comments:

"It is noted that the application site is located within settlement limits (as defined in Policy SC1 of the LDP). As such, the principle of the development is generally acceptable provided that the development would comply with all other relevant Planning Policies, and there is no unacceptable impacts in terms of visual or residential amenity, biodiversity or highway safety."

Where applicable additional information has been included within this application and the Planning Officer's comments have been addressed in the following section:

Impact on Visual Amenity

In terms of visual amenity, it is noted that the adjoining premises has a large three storey flat roofed rear extension and your proposal would mirror this in terms of design, scale and finishes. Given the presence of this adjacent extension it is considered that on balance your proposal would not be unduly out of keeping with the immediate surroundings. With regards to the proposed detached outbuilding, it is considered that by virtue of its siting in the rear garden beyond the existing out building which would be demolished to facilitate the development and its two-storey design and proposed finishing materials to match the proposed building would not have an unacceptably detrimental impact on its immediate surroundings.

The massing and siting of the proposal was important to not impact and add visual/physical density along the Gnoll Park Road. This was further determined by utilising the existing access for vehicles from the road to the back of the property. Although not as large as the neighbouring property, the massing was determined and influenced by the neighbouring property's big extension and increase in volume.

Impact on Residential Amenity

Overbearing and Overshadowing

With regards to overbearing and overshadowing, it is noted that the adjoining property (No 94) has a number of windows on both its rear and side elevations, whilst it is unclear whether these windows serve habitable rooms or secondary windows it is considered that due to the orientation of the proposed extension it considered on balance that the proposal will not unacceptably overshadow or overbear this property. The adjacent property No 98 has windows at both ground and first floor on its rear elevation, however due to the separation distance between the extension and this property it is considered that this element of the proposal would not unacceptably overbear or overshadow this property.

In respect of the proposed outbuilding, due to its minimum separation distance of 10 metres to the nearest residential property located in Park Street together with its two-storey design it is considered that it would not unacceptably overbear or overshadow neighbouring properties.

From the outset of the design, non-impact of overshadowing was influential in the determining the massing and mitigating any loss of light to neighbouring and nearby properties. Hence, the extent of the extension and situating the secondary building at the back of the plot.

Privacy

Habitable room windows to the rear would overlook the front elevation of the proposed outbuilding a distance of some 27 metres, as such the Authority's privacy standard would be met.

It is considered that the ground floor side window located to the rear of the property and serving a kitchen/lounge would not raise any privacy issues as it would be screened from the neighbouring property by the existing boundary wall.

The remaining windows on the ground and first floor side elevation would serve non habitable rooms. It is noted that a window on the second floor will serve a kitchen/lounge on the second floor, as this would not directly overlook habitable room windows in the neighbouring properties, no loss of privacy would result.

In respect of the proposed outbuilding as no habitable windows are proposed on either side elevation at both ground and first floor level and the rear boundary of the site is flanked by open land, it is considered that this element of the proposal would not result in a loss of privacy.

The locations of all new windows were meticulously positioned so as not to look onto neighbouring properties. Instead, the proposal looks within the site and face onto one another. This not only helped to eliminate privacy issues but forges a link between both properties and enhances their association within the plot.

Highway and Pedestrian Safety

The property is located within Zone 2: Town Centre or city centre fringe. It states that; "The centre of towns which local people regard as their destination for most activity which is not met within their own local community. The area has a full range of retail activity and many commercial businesses, all within walking distance. The area is the focus of the local bus network and is likely to contain a railway station. Built density is high with little private car parking. There are significant parking restrictions and substantial amounts of off-street car parking available to the public."

There are parking standards set within the SPG and an allowance to reduce those numbers of spaces based upon sustainability criteria. These points reduce the requirement for residential units down to 1 space per unit. Whilst it is acknowledged that the proposed 9 parking falls short of the required standard the site is in a sustainable location, close to the town centre with easy access to various modes of transport. Therefore, any submission should include justification for the reduction in parking provision being provided.

Throughout this application's design, reducing the number of car spaces was important. This was justified by its location and walking distance from Neath centre. Public transport is also regularly available as bus stops are located close to the site, see 2.6 Public Transportation.

Most importantly, with the need to reduce carbon emissions wherever possible, the lesser the vehicles on the road the lesser the traffic. The reduction of vehicles is ultimately better for the environment, for air quality and positive improvement in reducing carbon emissions.

There will be a requirement for secure cycle storage, and refuse storage, and as such, we would suggest that any proposal utilises the existing area of hardstanding for a secure bin store and cycle store to serve residents. Failure to provide these facilities may result in a recommendation of refusal.

As shown on the accompanying design documentation, dedicated zones for refuse and cycle storage have been incorporated. The refuse bin stores are located at the front of the property, which enables easy access for collection of waste. The cycle stores are situated behind the existing property. This not only provides a safe and convenient location, but avoids unnecessary potential theft of bicycles.

Affordable Housing

A development that creates 3 or more residential units will be required to address affordable housing. Planning Policy AH1 of the Local Development Plan requires 25% of the units within a development of 3 or more units to be affordable, in line with the Authority's adopted Supplementary Planning Guidance. Further details can be found in the SPG on the Authority's website.

This will either be through the provision on site of affordable units, to be transferred to an RSL or a financial contribution. More information on this is in the SPG. As such there may only be an opportunity to provide a financial contribution in this case. Again, details of how this is calculated can be seen in the relevant SPG.

This item should be read in conjunction with TAN 2, *Planning and Affordable Housing*. The aim of this Supplementary Planning Guidance (SPG) is to deliver affordable housing to meet the need in Neath-Port Talbot County Borough, circa 3,100 affordable homes, equating to 40% of the overall build rate. This will be addressed by two main categories of housing: Social Rented and Intermediate/Assisted Purchase with legal arrangements in place.

The Council's preferred method of achieving affordable housing is for owners to either build house (on-site) for transfer to a registered social landlord (RSL)/Local Authority or to provide a portion of the site as serviced land together with a contribution to cover the construction costs of affordable housing.

It should be made apparent the Applicant of this proposal primary job is working in the Healthcare Sector. As part of his core business ideology, he regularly employs low-income workers with the intent of giving back to the community and helping those with financial need and support.

Thus, the applicant aims to provide at least 2 units (25%) within the proposal as affordable, low-income accommodation for such staff.

Open Space

Policies I1 and OS1 of the Local Development Plan, and SPG: Open Space and Greenspace.

Policy OS1 Open Space Provision

Where there is a quantitative deficiency in outdoor sport, children's play, informal space or allotments, provision will be sought, including the requirement for maintenance, in conjunction with all new residential developments of 3 or more dwellings.

In this case on site provision cannot be provided, and an assessment of the shortfall within the Ward would need to take place to ascertain any potential financial contribution based on the exact nature of the development proposed upon submission of further details or a planning application.

Policy Threshold

In accordance with Policy OS1, in locations where there is a quantitative deficiency in one or more of the identified categories of open space, contributions will be required on all new housing developments on sites accommodating 3 or more units. The threshold of 3+ units will apply to all

proposals which result in self-contained units of accommodation, including conversions from non-residential use to residential, or the subdivision of a residential property, where the net increase is 3 units or above the existing number of properties.

Your attention is drawn to Table 4.1.1.1 of the SPG which sets out how open space requirements are calculated. In respect of the submitted proposals, contributions towards children's play will be required and are set out in the table below:

LDP Policy OS 1 Categorisation	On site Requirement (sqm)	Financial Equivalent
Outdoor Sports Pitch	211	£2,272
Outdoor Sport – Non-pitch	82	£8,240
Designated Play Space	29	£4,275
Informal Space	0	£0
Allotments	35	£384
Total	357	£15,171

The existing external site is mostly hardstanding. A principal design requirement of this proposal is to encourage the use of open space by incorporating the green area at the back of the property that has been neglected for decades. The scheme also introduces additional new green zones within proposal.

Although the site is physically limited in area, these green zones open-up the existing hard and grey outdoor hardstanding spaces. These informal open zones serve the outdoor areas for the residents where they can sit, socialise and enjoy these quiet spaces buffered away from the road.

This proposal has increased open green spaces as shown in Table 2

	Hardstanding: Soft Landscape (Ratio)	Percentage of Green Space
Existing Area	664 : 173	26%
Proposed Area	464 : 294	63%
Net Increase		43%

Table 2: Increase in Open Space

Also, it should be made apparent that the proposal is situated across the road from Neath Leisure Centre, Neath Tennis courts, Cricket Green, sports facilities and rugby stadium. Having these outdoor facilities at the doorstep also encourages the occupants to use these local sporting amenities along Dyfed Road and Gnoll Park Road and integrate with the wider community.

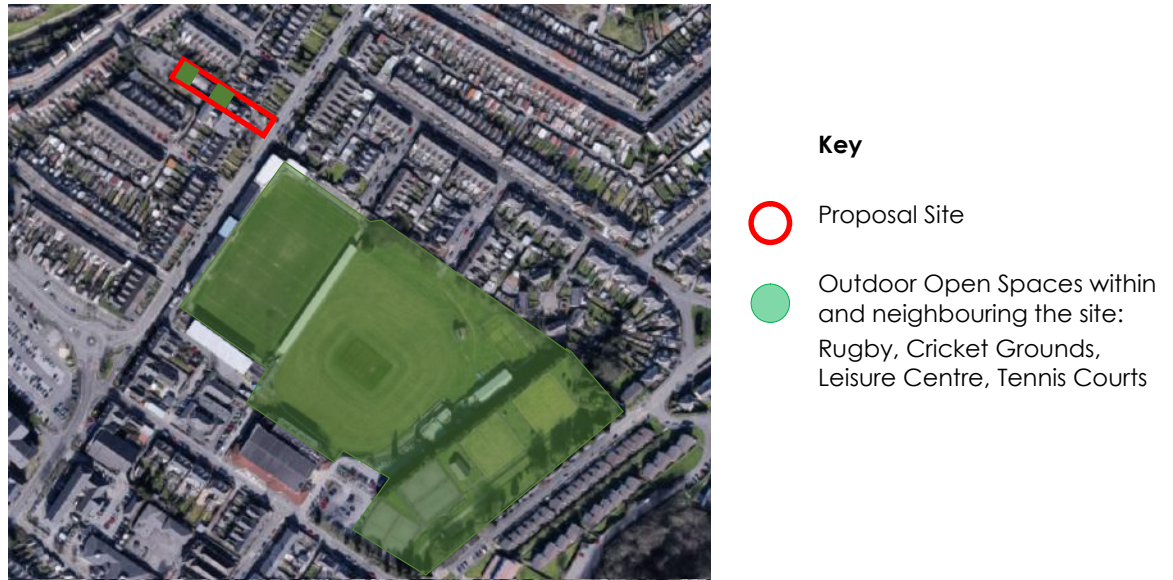


Figure 6 Outdoor Public Spaces Within the Site and Neighbouring to the Proposal

Biodiversity

Policies EN6 and EN7 will be of relevance insofar as there is a need to ensure any impacts on biodiversity/natural features are appropriately assessed and, where applicable, mitigated.

A bat survey will need to be submitted in support of any planning application. The results of this survey will determine if you will also need to put forward proposals for mitigation/compensation for any adverse impacts on this protected species identified. These measures will also need to be submitted with the application, and there may be need for a protected species licence dependant on the results of the survey and the mitigation proposed.

A bat survey was carried-out by Acer Ecology and no signs of bat occupancy were traced. Their report can be seen in 11.0 Appendix II: Bat Survey Report of document DAS-100 Design and Access Statement

4.0 Design

This proposal takes reference from Llywodraeth Cymru/Welsh Government's, *Beautiful Homes and Spaces* (BHS). This document encourages new homes and their environments to be visually attractive resulting from good space planning and architectural design, be of high quality and meet family and individual needs.

4.1 Beautiful Homes

The quality of housing is also about the value of the external spaces created, where "best practice" should be used as a standard ensuring a high-quality environment is created.

It also states for existing properties that, "Where homes are being refurbished, providers should (if practicable and cost effective to do so), take all opportunities to meet the standard but where this is not possible have adequate space and facilities for everyday living."

4.1.1 Homes should be of high quality, innovative and sustainable

Homes should represent value for money and "whole life cost" when assessing future maintenance costs against initial capital cost.

- Homes should demonstrate that they represent value for money and "whole life cost" analysis should be a material consideration when assessing future maintenance costs against initial capital cost.
- Opportunities should be taken to embrace Modern Methods of Construction (MMC). This includes various construction methods and technologies that can either replace traditional methods (e.g., using innovative technological or digital advancements), or complement them

(e.g. producing components for hybrid construction that reduce resource required on-site and/or speed up assembly). Further advice on MMC definitions can be found here. Delivery of homes via MMC should be viewed as a technological "step change" and not merely the inclusion of elements of the construction that are already traditionally produced off-site.

- c) Considering best practice in utilising a "circular economy" process, for example by;
- Choosing materials that are capable of being recycled and maximising the use of timber in construction to help Wales meet its carbon reduction targets.
 - Ensuring there is sufficient provision for the collection of key recyclables and storage of food waste in homes.
 - Reducing embodied carbon by utilising carbon sink and low carbon materials, processes and products in buildings.

This Proposal embraces Modern Methods of Construction (MMC) and technologies that replace traditional methods or complement them with off-site manufacturing.

It incorporates 'Best Practice' in selecting recyclable materials and maximising the use of timber in construction to help Wales meet its carbon reduction targets. Ensuring provisions are allocated for collection of key recyclables and storage of food waste in homes.

4.1.2 Homes should be flexible, responsive to the changing needs of the occupants, meet the changing needs of a variety of households who will occupy the building over its life and be of sufficient size.

- a) Rooms are large enough to take all the furniture occupants can reasonably be expected to need.
- b) The approach to each home, including the point of access, stairs, lifts and circulation is designed to enable easy movement of furniture and belongings to rooms within the home.
- c) Homes have adequate and convenient internal and external storage.
- d) Homes meet the minimum space standards in Appendix A and Appendix B.
- e) All houses have a shower (in addition to a bath) and are provided with adequate space on the ground floor with plumbing, electrical and mechanical ventilation connections to allow for the future installation of a barrier free shower facility suitable for use by a person in a wheelchair. Homes with occupancy of 6 or more have the barrier free shower facility installed.
- f) All flats and bungalows have a shower in addition to a bath and bungalows, ground floor flats and flats served by a lift have a bathroom designed so it is capable of adaptation for use by a person in a wheelchair.
- g) Considering how technology (such as mechanical ventilation with heat recovery and hybrid heating systems) might impact on space requirements.
- h) Homes should be designed to maintain the dignity of occupants and visitors by ensuring bathrooms and shower rooms (excluding en suite) do not open directly off habitable rooms or kitchens.
- i) Providing sufficient space for occupants to set up a home office in a suitable room to allow home working.
- j) Where practicable make internal walls non load bearing to enable future flexibility / adaptability and consider providing space in "one bedroom" homes for potential "sleep over".
- k) Consideration should be given to MMC techniques and innovation that can maximise flexibility for adaptations and allow homes to respond to occupants' needs over a building / occupant's lifetime.

The proposal ensures internal spaces and circulation routes will have sufficient areas enabling ease of movement and moving furniture. Thus, allowing adequate space for home-working, and adhering to the minimum space standard's ensuring dignity of its occupants and sufficient space for showers and baths. Where possible, the internal walls will be non-load bearing enabling flexibility/adaptability. MMC techniques will assist in maximising flexibility and allowing homes to respond to occupants' needs over a building/occupant's lifetime.

4.1.3 Homes should be safe and secure

- a) *Developments are designed to comply fully with the "Secured by Design" (SBD) Gold standard. <https://www.securedbydesign.com/>*
- b) *Mixed tenure developments, not fully under the control of the housing provider must meet (as a minimum) the Security Standard elements of SBD.*
- c) *Kitchens and bathrooms are functional and help reduce the risk of accidents.*
- d) *Stairs are designed to minimise accidents and not create unnecessary inconvenience by allowing sufficient space for a future stair lift and to facilitate the movement of furniture between floors.*
- e) *Homes are provided with sufficient, well located and convenient electrical socket outlets.*
- f) *Rear gardens are safe for small children to play in, are convenient to use and are easy to maintain.*
- g) *Car parking provision is conveniently situated and reflects the location and anticipated levels of car ownership.*
- h) *Homes should be fitted with carbon monoxide detectors.*

As with all conversions and new design, this proposal incorporates elements that are applicable ensuring the occupants are safe and secure. Features such as CCTV entrance cameras, ease of accessibility, conveniently located electrical sockets/carbon monoxide detectors, and car parking provisions will be appropriately situated.

The design responds to the site's context and setting in terms of building heights/verticality, plot width and setback. The result incorporates modern materials, construction methods and design responses that are in keeping with their surroundings. Existing building forms, architectural character, boundary treatments and building materials have also been assessed. The boundaries will be kept as it maintains continuity with the history of the area and eliminates removing parts of the existing site unnecessarily.

4.2 The Welsh Language and Placemaking

The *Planning Policy Wales* notes the Welsh language is part of the social and cultural fabric. Its future depends upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. Additional accommodation can only assist in unifying the local community with much needed housing stock in the area.

4.3 Sustainable Development

The proposal is not situated in a rural location, but reference has been made to TAN 6: Planning for Sustainable Rural Communities. It incorporates guidance where appropriate and applies this to the urban community.

Many buildings built within the last century go out of style but this should not mean their lifespans should also be shortened as well. Hence, adaptive reuse of existing buildings can have environmental and economic benefits. It also enables new ways they influence the understanding of people who use them.

To meet the government's target of carbon neutrality by 2050, recycling, reuse and responsibly adapting existing buildings will help considerably. Early research shows that upgrading and reusing existing buildings, rather than demolishing and building new, could dramatically improve a building's energy efficiency making substantial energy savings as the CO₂ emissions embodied within existing buildings are not be lost through demolition.

NPT, as do other councils throughout the UK, welcome projects for sustainable design, construction and reduction of carbon emissions, which helps combat climate change. The proposal ensures a proactive process is enabled in finding suitable materials that reduce carbon emissions and energy waste. This not only prevents excess waste of building materials but rejuvenates the life cycle of buildings for many years to come.

All materials specified would be selected for their low levels of inherent energy and high-performance characteristics. All floors, walls and roofs will be constructed from responsibly sourced material with a super-insulated wall and roof construction. New windows will achieve good performance U-value insulation levels along with any new installed highly efficient eco-rated boiler systems. These steps, when incorporated in the design from the outset, greatly improves ensuring the proposal will be of a high performance, which considerably reduces carbon emissions and energy use over the current dwelling.

Recycling of plastics, paper and other household waste is also an important attribute to reducing energy and polluting the atmosphere. Maintain housekeeping standards to prevent the escape of litter.

5.0 Amenities

5.1 Visual Amenity

The proposal has a large recessed front garden with a spatial separation distance from the boundary of 15m. This follows the surrounding pattern of development in the vicinity of other existing and properties. Due to the proposal's recessed location and unchanged front elevation, it will have minimum impact on streetscape and thereby protecting the visual amenity of the area.

5.2 Residential Amenity

The garden area not only provides external space but also stays in keeping with the open spaces replicating the surrounding dwellings. The form and massing of the proposal has diligently taken into consideration the need to protect and preserve the amenity of the neighbours from its location.

The design has waste and recycle storage provisions in the front garden with spacious easy accessibility for collection, see 5.5 *Waste Management Strategy*. The existing external hardstanding front garden will continue to be used for parking, see 5.3 *Vehicle Access and Car Parking Standards*. The proposal is considered to contribute positively to the character of the local vicinity.

5.3 Vehicle Access and Car Parking Standards

With reference to the Local Development Plan, 2011-2016, *Supplementary Planning Guidance: Parking Standards* (October 2016), its vision is to improve transport and access within and beyond the region to facilitate economic regeneration, reduce deprivation and support the development and use of more sustainable and healthier modes of transport. To deliver this vision the Joint Transport Plan identifies strategic objectives, a long-term strategy and a programme of projects to deliver the strategy and objectives.

Currently, there are 5 parking spaces at the front and 9 parking provisions at the back, totalling 14. This proposal will reduce the number of parking spaces and vehicle access to 9, see 5.3.3 *Carparking and Cycle Parking Standards*. Therefore, this proposal also reduces vehicle pollution.

As noted above, the built proposal is less than 1,000m² of development and therefore a Travel Plan is not required.

5.3.1 Strategic Policy SP20 Transport Network

The transport system and infrastructure will be developed in a safe, efficient and sustainable manner through the following measures. The following also relate to the LDP Objectives: OB2, OB21 and OB22:

1. Implementing key transport projects and supporting schemes identified in the Joint Transport Plan;
2. Promoting connectivity and access to public transport through improving bus and rail facilities;
3. Supporting enhancements to the walking and cycling network;
4. Promoting park and share schemes along key highway routes;
5. Promoting efficient use and links to the transport network through the identification of a road hierarchy;
6. Restricting development which would have an unacceptable impact on highway safety;

7. Requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport;
8. Requiring appropriate parking provision;
9. Facilitating movement of freight by means other than road.

5.3.2 Policy TR2 Design and Access of New Development

Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or
2. create unacceptable levels of traffic generation;
3. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;
4. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;
5. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.

The purpose of applying the parking standards the following table outlines the land use specified within the Town and Country Planning (Use Classes) Order 1987.

Use Classes in 1987 Order	Land Use in Parking Guidelines
Class C3: Dwelling Houses	General Purpose Houses & Flats Sheltered Accommodation

The following parking standard and ratio requirement for residential new build and conversions is set-out:

Type of Development	Residents	Visitors
General Purpose: Houses and Apartments		
House conversions to bedsits, or self-contained apartments	1 Space per bedroom (maximum requirement 3 spaces per apartment)	1 space per 5 units

For developments where clear evidence has been supplied that car ownership levels will be lower than normal, a more flexible approach to numbers of parking spaces may be taken. Acceptable evidence of this would be a contractual arrangement with tenants to secure low car ownership levels.

5.3.3 Carparking and Cycle Parking Standards

In Section D: Cycle Parking Standards suggests that cycles should be located in a safe, secure and convenient location, and care should ensure that cycle parking facilities are not located where they may obstruct pedestrian access.

All residential developments must be accessible by cycles and cycle storage must be a factor of dwelling design. In appropriate circumstances, convenient communal facilities may be provided.

The provision for the number of cycles is set-out in the following table:

Type of Development	Cycle Parking Provision	
	Long Stay	Short Stay
a) Residential Apartments	1 stand per 5 bedrooms	No Requirement

The proposed plan will add 3 parking bays to the existing 5 parking bays, thus providing a total of 8 parking bays. 8 bicycle bays for residents will also be provided.

Parking Facility	Existing	Proposed
Vehicle Bays	14	
Vehicle Bays		9
Cycle Spaces		3

Pedestrian access remains as being via a common access front entrance door directly accessed from the pavement of Gnoll Park Road.

Although the proposal aims to increase awareness for using public transportation, vehicle access will be provided to the front and behind the main entrance and adhere to the LDP Parking Standards. The proposal retains the existing access point off Gnoll Park Road, which includes sufficient space to allow access for emergency vehicles, service and fire engine.

5.4 Flooding and Drainage

The general approach of PPW, supported by TAN 15, is to advise caution in respect of new development in areas at high risk of flooding by setting out a precautionary framework to guide planning decisions.

The accompanying document *FRA-100 Flood Risk Assessment*, identifies the application site does not fall within a river or sea floodplain, and is more than 50 metres from the nearest river or sea floodplain. The land has a very low chance of flooding from rivers or the sea and is unlikely to flood. The chance of flooding each year is less than 0.1 percent (1 in 1000). This takes into account the effect of any flood defences that may be in this area.

Also, the Cyfoeth Naturiol Cymru/Natural Resources Wales Flooding map shows the plot is outside any flood risk.

Due to the existing hardstanding landscape around the proposal, surface water run-off will continue to utilise the existing surface water run-off.

5.5 Waste Management Strategy

This section takes into consideration TAN 21: Waste and ensures it has been addressed where appropriate. The front garden will enable a dedicated location for waste storage and refuse collection. The waste and refuse department at Neath Port Talbot Council, the requirement is to allocate a provision for either a wheelie bin or for 3 black bin liners. This would depend on accessibility for a refuse vehicle to park outside the property.

Gnoll Park Road, B4434, is a wide road that accommodates cars, buses and other larger vehicles. Thus, a provision is made to store 1 wheelie bin per flat. A storage for 8 wheelie bins will be provided with easy access for collection at the designated time refuse is collected on Gnoll Park Road.

Household Waste Recycling Centres are provided by the local authority for the disposal and recycling of household waste including bulky items free of charge. The www.npt.gov.uk/recycle website inductees that refuse collections are every alternate week and colour coded as a Blue Week or Yellow Week.

Week	Waste Type
Blue Week	General waste, household plastic, cardboard, garden waste, food waste, mixed glass bottle & jars, cartons, tins & cans, foil, mixed paper, mixed textiles & clothes and batteries
Yellow Week	Household plastic, cardboard, garden waste, food waste, cartons, tins & cans, foil, mixed paper, mixed textiles & clothes and batteries

The waste storage facility does not obstruct the residents' access to and from the entrance door. A dedicated location for the waste storage also provides good ease of access for the refuse collection service.

6.0 Conclusion

The North Port Talbot design guides were referred to at every stage of this application's development from its siting, acknowledgment of the local landscape, aesthetics and amenities. The design guides have been very helpful in providing the foundation and background to the proposal design process.

The above shows that every effort has been made to discuss and review the application prior to producing and submitting this planning application.

7.0 References

Neath Port Talbot's County Borough Council's Supplementary Guidance and Local Development Plan (2011-2026).

Local Development Plan, 2011 – 2026, Design Supplementary Planning Guidance (JULY 2017)

The Town and Country Planning (GPDO) (Amendment) (Wales) Order 2009, No1024:
Design and Access Statements: Wales

The Town and Country Planning (GPDO) (Amendment) (Wales) Order 2008, No 2336:
General Development Procedure
Technical Advice Note 11: Noise
Technical Advice Note 12: Design
Technical Advice Note 15: Development and Flood Risk
Technical Advice Note 21: Waste
Technical Advice Note 22: Planning for Sustainable Buildings
Technical Advice Note 6: Planning for Sustainable Rural Communities

PART B Development Quality Requirements 2016 Proposed mandatory Standard & Guidance for new and rehabilitated housing in Wales using Welsh Government subsidy

Local Development Plan, 2011-2016, Supplementary Planning Guidance: Parking Standards (October 2016)

Llywodraeth Cymru/Welsh Government, *Beautiful Homes and Spaces*, July 2020

MMC Definition Framework, Ministry of Housing, Communities & Local Government, 2019