

PLANNING, DESIGN AND ACCESS STATEMENT

Ty Mawr, Pontardawe

April 2022



Summary

Proposal:

Proposed residential development for conversion and extension of building to provide 12no. affordable flats.

Location:

Ty Mawr, Llys Glanrafon, Pontardawe, SA8 4EG

Date:

April 2022

Project Reference:

S21.270

Client:

Pobl Group

Product of:

Asbri Planning Limited

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Contents

Section 1	
Introduction	4
Section 2	
Site Description and Context	6
Section 3	
Interpretation	10
Section 4	
Pre-Application Advice	12
Section 5	
The Proposal	17
Section 6	
Planning Policy Context	21
Section 7	
Planning Appraisal	28
Section 8	
Conclusion	34

Introduction

- 1.1 The purpose of a Planning Design & Access Statement (PDAS) is to provide a clear and logical document to demonstrate and explain the various facets of design and access in relation to the site and to appraise the proposed development against relevant planning policies. It also presents the details of a planning application in a way that can be read both by professionals and the public.
- 1.2 The diagram below, extracted from Chapter 3 of Planning Policy Wales 11, summarises the five objectives of good design that should be taken into account when preparing a DAS. The circular nature of the diagram represents the equal weightings that need to be given to each of the 5 Objectives of Good Design: Access; Movement; Character; Environmental Sustainability and Community Safety.

Figure 1: Principles of Good Design



- 1.3 The submitted Design and Access Statement adheres to guidance embodied in the Welsh Government publication, Design and Access Statements in Wales, published in June 2017.
- 1.4 The statement is subdivided into eight sections, commencing with a brief overview of the site context and analysis in Section 2. Section 3 provides the vision and brief of the proposal. Section 4 interprets and applies the context of the brief and vision for the site, whilst Section 5 summarises the relevant planning policy. Section 6 sets out the proposal, explores the relevant design and access facets associated with the application and provides a response to planning policy.

Section 7 comprises a planning appraisal. The document then concludes, under Section 8.

- 1.5 This Planning Design and Access Statement (PDAS) has been prepared on behalf of Pobl Group for the proposed residential development for conversion and extension of building to provide 12no. affordable flats at Ty Mawr, Llys Glanrafon, Pontardawe, SA8 4EG.

Site Description and Context

General Location

- 2.1 The application site comprises an existing property situated on brownfield land, in Pontardawe, Swansea. Pontardawe is a town within the Swansea Valley, located approximately 15km to the north east of Swansea along the 14067. The site is centered on grid coordinates E: 272272, N: 203648 and is within the Neath Port Talbot Council jurisdiction.

The Site

- 2.2 The site is comprised of the existing two storey Ty Mawr which provided sheltered accommodation alongside surrounding grounds, located centrally along Ynysderw Road. The rectangular-shaped parcel of land extends to approximately 0.15 Hectares and comprises brownfield land.



- 2.3 Ty Mawr previously housed a fully occupied over 55's Sheltered Accommodation facility, including a full-time warden on site. There are 11 no. residential apartments existing within the building due to this, as depicted on the existing floor plans. Communal areas are located internally and within the garden area for social activities. The scheme from purchase, initial refurbishment and reconfiguration was utilised as Sheltered Accommodation until it's closure and there have been no intervening uses since, albeit the building has been maintained throughout this period.
- 2.4 An example of one of the flats (flat 10), in its current condition, is shown in the photographs overleaf.



- 2.5 A review of the historic Wales maps identifies there are no listed buildings within or adjoining the site. The nearest historic asset is Scheduled Ancient Monument Pen-y-Gaer Hillfort approximately 600m to the east of the site.
- 2.6 The building has been identified as a Building of Local Importance by NPTCBC for the following reason: *The building has been carefully converted in order to retain its character. Only remaining building of the original steelworks which has been redeveloped.*

Description: A substantial 2-storey former steelworks office building. Prominent front gables and main entrance porch. Painted render and slate roof with central feature.



Architectural Interest	Historic Interest	X	Historical / Cultural Association	X	Group / settlement character Value	X	Old or Rare Local Buildings
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Justification for Consideration: The building has been carefully converted in order to retain its character. Only remaining building of the original steelworks which has been redeveloped.

Notes:

- 2.7 In addition, there are no Public Rights of Way (PROW) within or adjacent to the site boundary.
- 2.8 The Coal Authority's Map shows that the site is located within the South Wales Coal Mining Reporting Area however is not located within a development high risk area.
- 2.9 Utilising the Health & Safety Executives, Planning Advice Web App Service we have noted that the site does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline; therefore, at present HSE does not need to be consulted on any developments on this site.

Surroundings

- 2.10 Immediately to the north eastern, south eastern and southern boundaries, residential properties surround the site by Llys Glanrafon. To the west of the site, the nearest supermarket exists (Lidl).
- 2.11 The area surrounding the site is therefore predominantly characterised by residential dwellings with complementary uses situated throughout the area including Lidl, retail shops, Cwmtawe Community School and Pontardawe football rugby club. The land to the north west of the site is allocated for residential development. The River Tawe runs to the south east of the site and a footbridge provides access across adjacent the rugby club car park.

Access

- 2.12 An existing site access is located to the north western boundary and provides access to 4 no. existing car parking spaces. The main pedestrian access is located at the buildings north western elevation of Ynysderw Road.
- 2.13 The nearest bus stop is located along the A474 named the Jubilee By Pass and is approximately 300m from the site. A traffic free cycle route runs along the north western bank of the River Tawe travelling directly to Swansea Town Centre and is shown on the OS mapping below (orange dot):



Planning History

- 2.14 A review of the planning register revealed there are no recent or relevant planning applications of relevance to this site.

Interpretation

3.1 The concept for the development of the site has derived from the following;

- Full site analysis including a full desktop study of the site and its surroundings; and
- Discussions with the client and a full understanding of the brief and vision of the project.

3.2 The above steps have presented the key opportunities and constraints for the site, which are outlined below;

Opportunities

3.3 **Settlement Boundary** – The site is situated within the Settlement Boundary of Pontardawe, where in principle development is acceptable.

3.4 **Existing Residential Context** – The site is situated within an existing residential context. Adjacent to the site lies residential dwellings. The existing residential context provides an opportunity to progressively expand. It is noted that the previous use was also residential in nature.

3.5 **Sustainable Location** - The site lies in a sustainable and accessible location. The site is accessible for pedestrians, cyclists and public transport users. Furthermore, the site is located within proximity to a number of services and facilities, increasing the possibility that journeys generated by the development will be short and can be made by sustainable forms of transport. The site is also served by good-quality highways and has convenient access to the highway network.

3.6 **Vacant Property** - The property is currently vacant and has been for some time. As such, the proposed development will make efficient use of a suitable building.

3.7 **Site Layout** - The site can be designed to ensure no detrimental impact to surrounding neighbour's privacy and amenity.

3.8 **Building of Local Importance** - The building has been identified as a Building of Local Importance by NPTCBC for the following reason: The building has been carefully converted in order to retain its character. Only remaining building of the original steelworks which has been redeveloped. Given the vacant use of the site, the development will

bring an important historic property back into beneficial use with minimal impact to its character.

Constraints

- 3.9 **Air Quality** - The application site is located in the nickel exceedance area. A stand-alone Air Quality Assessment has been prepared and supports the submission.
- 3.10 **Flood Risk** – A review of TAN 15 Development Advice Maps shows the site to be located within Flood Zone C1. As such, the area is served by significant infrastructure, including flood defenses. A stand-alone Flood Consequences Assessment has been prepared and supports the submission.

Pre-Application Advice

- 4.1 Pre-application advice was sought from Neath Port Talbot Council on 29th March 2021 (ref: Q2021/0074). A response was received on the 19th May 2021. The pre-application sought advice on the conversion and extension of the building to provide 14 affordable flats (Non statutory). The following comments were received:

Principle of Development

- 4.2 The application site is located within settlement limits (as defined in Policy SC1 of the LDP). As such, the principle of development is generally acceptable providing the proposed development would comply with all other relevant planning policies, and there are no unacceptable impacts in terms of residential and visual amenity, highway and pedestrian safety, biodiversity, flooding, air pollution, noise or land contamination.

Layout, Scale and Design

- 4.3 Criterion 8 of Policy BE1 (Design) requires developments to make the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 30 dwellings per hectare in the Valleys Strategy Area. The response confirms that the proposal meets the required density.
- 4.4 In regard to the building as a building of local importance, the response confirms that the proposal includes a two storey rear extension which would be approximately half the width of the existing building and have a projection of some 13.5 metres. It is considered that by virtue of its size and siting close to the rear boundary of the site would not only unacceptably detract from the character of the host building but also the overall character of the area. By virtue of its scale and siting the proposed extension would lose the sense of openness which presently exists and result in a form of development that would be imposing and overbearing.
- 4.5 Whilst the proposal indicates two amenity spaces, the officer states the need to be interlinked to provide connectivity within the site and to maintain that open feel to the development. The internal arrangement should also be configured in a way which respects the current external walls and appearance of the building, utilising existing openings as far as possible.

Residential Amenity

- 4.6 In respect of potential overlooking issues, it is noted that any proposal will need to demonstrate that the required privacy standards contained within the Supplementary Planning Guidance –Design has been met.
- 4.7 To conclude it is considered that the principle of conversion/extension would be acceptable subject to the above design considerations.

Highways

- 4.8 The proposal has been assessed by the Head of Engineering and Transport (Highways) who has raised the following comments:
- Each flat shall be provided with one car parking space per bedroom up to a maximum of three. It is noted that the supporting document states that 10 spaces are ample due to it being a RSL and the applicant has undertaken a sustainability assessment to reduce the spaces to 10 spaces, however NPTCBC Parking Standards document states on page 65 Point F1 'the reduction in parking for residential units shall not result in less than one parking space remaining' Based on the fact that 14 flats (combination of 6 x 1 bed and 8 x 2 bed) are currently proposed the minimum we require is 14 car parking spaces, which would be a reduction from the 22 car parking spaces required should the sustainability assessment not have been undertaken.
 - The dimensions and layout of the car parking in terms of design (size of spaces & off set reversing distance) is satisfactory.
 - Consideration should be given to access from Ynysderw Road due to concerns over the increased trips that would be associated with the development.
 - The carriageway narrows to approximately 4m (measured off GIS) for a length of approximately 20m on the access route to the development site. Does the applicant have any intentions to widen the highway at this location to accommodate the increase in vehicle trips?
 - The footway leading to the development is below the standard requirement for a footway, if the developer is promoting sustainability and reduced car ownership are there any proposals to widen this and ensure adequate lighting along its route?

Biodiversity

- 4.9 The Local Authority's Ecologist has advised the following:
- A bat scoping assessment and additional surveys as required

- Details of biodiversity enhancement measures which includes artificial bat and bird boxes incorporated into the fabric of the building and/or soft landscaping areas to include a majority of native/wildlife friendly planting.

Land Contamination

- 4.10 As the site falls within a land contamination buffer and the site has a history of metal works a Phase 1 Preliminary Land Contamination Risk Assessment (desk study) will be required to accompany the planning application.

Air Quality/Noise

- 4.11 The Authority's Environmental Health Officer has advised that if an application were to be submitted he would raise an objection on the grounds that the application site is located in the nickel exceedance area.
- 4.12 The data available suggests that the site is at high risk, making unsuitable for residential purposes. Therefore, he recommends that any planning application submitted should be accompanied by an Air Quality Assessment.
- 4.13 In respect of noise, The Environmental Health Officer has advised that due to the proximity of the application site to the Lidl delivery bay a Noise Impact Assessment may have some bearing on the layout of the development and as such should be submitted with the planning application.

Flooding

- 4.14 The response confirms that the application site is located in Flood Zone C1 where the proposal appears to satisfy the justification tests as set out in TAN15 . In addition, there is also a requirement to submit a Flood Consequences Assessment with the planning application.

Supporting Documents

- 4.15 The response concludes that any application for the above development should also be accompanied by the following additional documentation: -
- Welsh Language Impact Assessment;
 - Statement of how development complies with TAN15 / Flood Consequences Assessment;
 - Bat Survey;
 - Site survey identifying existing ground levels, plus details of proposed levels including sections / cross-sections;

- Noise Impact Assessment;
- Air Quality Assessment;
- Phase 1 Preliminary Land Contamination Risk Assessment;
- Details of Biodiversity Enhancements;
- Tree Survey; and
- Details of 100% Affordability.

Further Pre-Application Discussions

4.16 Following the initial pre-application response, a number of design changes were made and resubmitted to the Case Officer, where the following comments were received:

- The proposal as a whole would appear far more cohesively than previously proposed. However, we think that the existing window design needs to be replicated particularly to the front, but given the eaves height this may be difficult. Consequently, it is suggested that the eaves and ridge height of the extension should be raised together with an increase in the pitch of the extension when viewed from the front. The window details whilst they may not be the same size, can have the arc at the top and positioning to match even as a smaller window unit across the whole extension, which would carry through a strong design feature.
- On plan (Roof Plan 01) shows the extension to be relatively in line with the existing side elevation, on Elevation D 04 (bottom of the doc) it appears to stick out and would suggest that it is brought in-line. In addition, we also consider that the rear elevation of the annexe should include a hipped roof to match the existing angles of the host property, particularly as it is a locally important building, it is important to retain and carry these design traits through.
- In terms of general layout and flow, the site would be more permeable now and retain a sense of openness.
- The scheme should include sustainable modes of transport here i.e secure bike lock area. The Highways Officer has advised that the two spaces at the end of the car parking area are unacceptable as there is no facility for these cars to turn if the spaces are all occupied therefore it will result in vehicles being reversed for a distance in excess of 25m to access/egress the car park, and consideration should be given to relocating these. One suggestion is that the bin storage area is moved further into the site and it is replaced by the 2 parking spaces.
- In addition, no evidence as requested for the reduction in the amount of parking spaces has been provided as it deviates from

our Parking Standards, such evidence would need to accompany any application.

- 4.17 The subsequent comments and advice has been integrated and design changes made to produce the final plans submitted within this application.

The Proposal

- 5.1 This Planning Design and Access Statement relates to the full application for proposed residential development for conversion and extension of building to provide 12no. affordable flats at Ty Mawr, Llys Glanrafon, Pontardawe, SA8 4EG.
- 5.2 The proposal comprises the conversion of the building from sheltered housing to flats with a two storey extension at the south eastern elevation. The ground floor shows 6 units which would be replicated at first floor. The extension design would be to match the existing building. The extension will be built upon an area that is on western elevation of the building which sits on grassland including shrub and poor condition trees and part of the existing parking area. The proposal would provide amenity space to the south east of the building with feature garden space.

Access and Movement

- 5.3 One of the key issues surrounding new forms of development is accessibility and how the proposed layout promotes ease of access for all potential users which can be achieved by ensuring connections are very well pronounced.

Vehicle Access and Parking

- 5.4 The existing vehicular site access from Ynysderw Road would be blocked up. In addition, a new opening in the existing hedgerow to the south east of the site is proposed to form a new access off Llys Glanrafon into parking courtyard.
- 5.5 In relation to car parking, 12 spaces are proposed extending the existing provision. NPT locates the site within Zone 2 Town Centre or City Centre Fringe and is the most sustainable location within the authority as there are no zone 1 locations. The authority operates maximum standards and accepts sustainability appraisals to reduce parking provision. The proposed layout shows 6 x 2bed and 6 x 1bed flats (18 beds total) and as such would have a minimum requirement of 18 spaces with 2 visitor (1 space per bedroom). In terms of sustainability the following points could be achieved:

Local facilities

- Lidl within 200m
- Cwmtawe school within 200m
- Pontardawe Dental Centre within 400m
- 3 facilities within 400m = 4 points

- Bus Stop within 300m = 3 points
- Cycle route within 100m = 1 point
- Frequency of bus route every 10 minutes = 2 points

Total points = 10 points

5.6 This allows for a reduction of 2 spaces per dwelling. It is noted that the reductions in parking requirement for residential units shall not result in less than one parking space remaining. With 2 beds requiring 1 space, the development would now require 12 spaces. Notwithstanding this the site is considered to be in a highly sustainable location with realistic opportunities for active travel and public transport.

5.7 It is noted that 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. A lower car ownership level is anticipated within this development being delivered by a Registered Social Landlord albeit the sustainability credentials of the site already justify a reduction in this respect.

Active Travel

5.8 As aforementioned, the nearest bus stop is located along the A474 named the Jubilee By Pass and is approximately 300m from the site. A traffic free cycle route runs along the north western bank of the River Tawe travelling directly to Swansea Town Centre.

5.9 The nearest train station is located in Llansamlet, approximately 5 miles south of the site. From here, regular services run to Cardiff, Swansea and Manchester Piccadilly.

Character

Amount, Scale and Layout

5.10 This planning application comprises the conversion and extension of building to provide 12no. affordable flats at Ty Mawr, Llys Glanrafon, Pontardawe, SA8 4EG.

5.11 The proposed development comprises a total of 12no dwellings. The units will be 100% Affordable dwellings with 6 per floor. The schedule of accommodation comprises 6no. 2 bed apartments and 6no. 1bed apartments. It is considered, and confirmed within the pre-application response that this will provide an appropriate density for the area.

- 5.12 The property, including the proposed extension will remain as two storey as per the existing property. This scale is believed to be acceptable in terms of the local context, comprising of a range of one and two-storey dwellings.
- 5.13 The proposed layout and extension provided demonstrates that the site is capable of accommodating sufficient distance from existing residential properties maintaining their amenity and privacy. The layout and orientation of surrounding residential areas have been considered within the design. It is considered that the development will provide a natural expansion of the existing residential area.

Appearance

- 5.14 It is considered that the proposal has been designed in a manner that is within keeping with the surrounding character and appearance. As noted previously, the property is identified as a Building of Local Importance by NPTCBC as it is the only remaining building of the original steelworks which has been redeveloped. Given this, the proposed extension has been sensitively designed with proportions and materials that complement the existing property. The following materials are proposed:

- Roof finished in blue/black fibre cement slates with contrasting ridge tiles and PV panels on the southern elevation;
- White upvc fascias & black rainwater goods;
- Walls finished in smooth painted render to match existing;
- Off white upvc windows, with PCC Cills to match; and
- New section of 1.8m high fence to rear of the parking courtyard is also proposed;
- New parking courtyard to be finished in block paviors (colours to be agreed).

Landscaping and Biodiversity

- 5.15 Landscaping is a key consideration in developments. Landscaping is a critical element of placemaking, which this proposal considers strongly. PPW 11 and the Neath Port Talbot Council emphasise that retaining existing features into new developments helps to create places that are distinct and soften the impact of change by creating a sense of continuity that acknowledges local identity.
- 5.16 As shown on the proposed layout, the proposal makes provisions to retain as much greenspace as possible throughout the site and retains all trees of significant value. The greenspace creates useable amenity space for future residents of the apartment block.

- 5.17 A new section of the 1.8m high fence is also proposed to rear of the parking courtyard to tie in with existing (with hedgerow to base). Hedgerow boundaries between the proposed property and residential neighbours are proposed to ensure privacy and amenity is sufficient.

Community Safety

- 5.18 TAN 12 suggests that community safety can be achieved via design solutions that can aid crime prevention. These include providing natural surveillance, improving safety by reducing conflicts in uses, and promoting a sense of ownership and responsibility.
- 5.19 It is considered that the site has been developed to reduce concealed areas that are not overlooked. Importantly this includes all areas of car parking which will be appropriately lit and naturally overlooked.

Environmental Sustainability

- 5.20 The site is located in a sustainable location. Though vehicular parking will be provided as part of the development, a wealth of services can be accessed within desirable or acceptable walking distance (in accordance with CIHT standards).
- 5.21 Additionally, the public transport infrastructure serving the site is of a high-quality, as aforementioned.
- 5.22 Furthermore, SUDS areas are indicated on the Proposed Plan, showing the site's sustainable drainage credentials.

Planning Policy Context

Introduction

- 6.1 The planning policy framework for the determination of this application is provided by the content and scope of National Planning Policy, which is contained within Future Wales (2040), the eleventh edition of Planning Policy Wales (PPW) and its associated Technical Advice Notes (TANs), together with the Local Planning Policy and its supplementary planning guidance.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
 - Neath Port Talbot Council Local Development Plan (adopted January, 2016).

Future Wales

- 6.3 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. 'Future Wales' sets out the Welsh Government's strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.
- 6.4 The National Plan acknowledges the urgent actions and changes in behaviour that were introduced in response to the COVID-19 pandemic and how they will emerge as permanent features of life. These include using spaces differently, travelling less and spending more time working from home. The National Plan notes that the planning system must respond to these changes and contribute to a sustainable recovery, shaping places around a vision for healthy and resilient places. The strategy blends the existing settlement patterns and the distribution of jobs and homes with a vision of managing change and future trends for the benefit of everyone in Wales.
- 6.5 Future Wales divides Wales into four regions, North, Mid Wales, The South West and The South East. Page 162 highlights how 'Across the

South West there are a range of strategic issues. Many of these issues have national, regional and local dimensions and will be delivered through co-ordinated action at all levels.'

- 6.6 The National Plan identifies 11 outcomes that can be achieved over the next 20 years if the planning system – through Future Wales and other development plans – is focused on the long-term and provides quality development in the right places for the right reasons. These Outcomes are inter-related and inter-dependent, and will improve places and well-being across Wales. The intention is to create a Wales where people live....
1. ... and work in connected, inclusive and healthy places
 2. ... in vibrant rural places with access to homes, jobs and services
 3. ... in distinctive regions that tackle health and socio-economic inequality through sustainable growth
 4. ... in places with a thriving Welsh Language
 5. ... and work in towns and cities which are a focus and springboard for sustainable growth
 6. ... in places where prosperity, innovation and culture are promoted
 7. ... in places where travel is sustainable
 8. ... in places with world class digital infrastructure
 9. ... in places that sustainably manage their natural resources and reduce pollution
 10. ... in places with biodiverse, resilient and connected ecosystems
 11. ... in places which are decarbonised and climate resilient

Planning Policy Wales (PPW)

- 6.7 National planning policy is contained within the eleventh edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2021. PPW is supported by 21 topic-based Technical Advice Notes (TANs), which are also relevant. PPW is the Welsh Government's principal planning policy document, setting out the context for sustainable land use planning policy, within which Development Plans are prepared and development.
- 6.8 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Wellbeing of Future Generations (Wales) Act 2015 and other key legislation. PPW and Future Walrd set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

6.9 Sustainable development is defined as:

“Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. ”

6.10 Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Plans at all levels of the development plan hierarchy must be prepared in accordance with national planning policies. Planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.

6.11 The aforementioned Well-being of Future Generations Act is further explored in Section 1 of PPW, within which the 7 goals are further discussed. The goals are intended to shape the work of all public bodies in Wales and are listed as follows;

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and,
- A globally responsible Wales.

6.12 Under Section 2 – People and Places – Achieving Well Being Through Placemaking, 5 Key Planning Principles are highlighted, under the general heading of Achieving the Right Development in the Right Place which are:

1. Growing our economy in a sustainable manner
2. Making best use of resources
3. Facilitating Accessible and Healthy Environments
4. Creating and Sustaining Communities
5. Maximising environmental protection and limiting environmental impact.

- 6.13 Placemaking is a key thread running through the 11th Edition of PPW. It is described as an *“inclusive process, involving all of those with a professional or persona interest in the built and natural environment, which focuses on developing plans, making decisions and delivering developments which contribute to the creation and enhancement of sustainable places.”*
- 6.14 PPW emphasises that good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.
- 6.15 Previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.
- 6.16 Section 4 – Active and Social Places defines those places which promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities. Places which are active and social contribute to the seven goals of the Well-being of Future Generations Act. The key issues in this theme include:
- ensuring there is sufficient housing land available to meet the need for new private market and affordable housing;
 - assisting in the delivery of cohesive communities which will meet the needs and are accessible to all members of society, including older people;
 - tackling inequalities between communities, delivering services and jobs closer to where people live and acknowledging the importance of inclusive communities and the wider environment for good health and well-being;
 - improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles
- 6.17 Section 6 – Distinctive and Natural Places – this theme covers environmental and cultural components of placemaking. It states:
- “The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for*

historic, scenic, aesthetic and nature conservation reasons. These features give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles."

Technical Advice Notes

6.18 This application has been prepared in deference to the latest version of the following TANs:

- TAN 11: Noise (1997);
- TAN 12: Design (2016);
- TAN 15: Development and Flood Risk (2004);
- TAN 18: Transport (2007).

Well-being of Future Generations Act (2015)

6.19 The Well-being of Future Generations (Wales) Act came into force in 2015 and seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act puts in place seven well-being goals in order to make sure that everyone works towards the same vision. The well-being goals include:

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and
- A globally responsible Wales

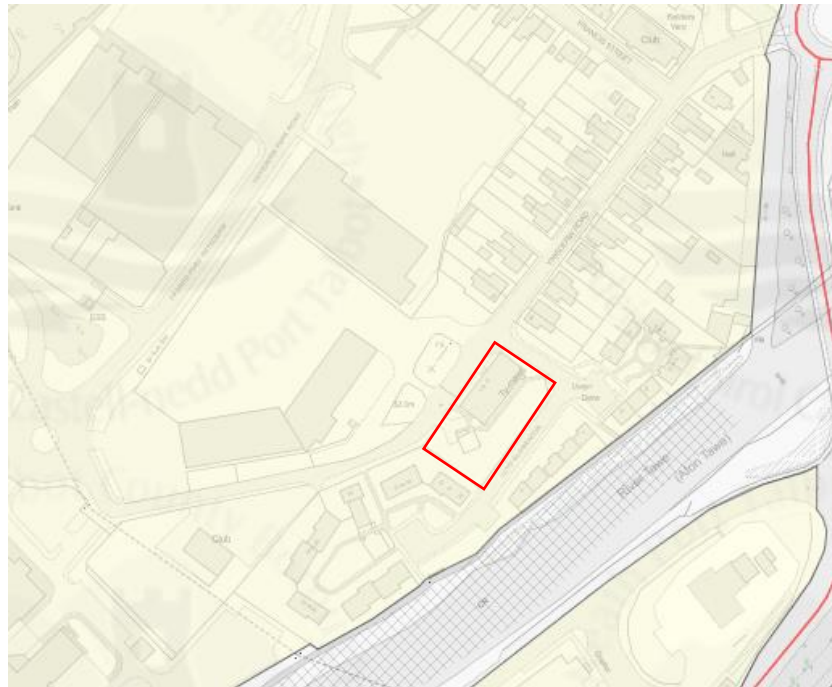
Design and Access Statements in Wales (April 2017)

6.20 This guidance document sets out the requirements for a DAS, the benefits of preparing a DAS and some of the pitfalls that should be avoided when preparing the document. Section 5 of this document provides guidance on what to include in a DAS and how to communicate the proposals.

Neath Port Talbot Local Development Plan

6.21 The development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 is the adopted NPT Local Development Plan which forms the statutory framework for the development and use of land within Neath Port Talbot. The LDP was adopted by the Council in January 2016.

6.22 As shown on the adopted Proposals Map below, the site is unallocated land located inside of the settlement boundary. The site is within the mineral Settlement Protection Zone.



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

Policy Reference	Relating to
SP1	Climate Change
SP2	Health
SP3	Sustainable Communities
SC1	Settlement Limits
SP6	Development in Valleys Strategy Area
SP7	Housing Requirement
SP8	Affordable Housing
AH1	Affordable Housing
AH2	Affordable Housing Exception Sites
SP10	Open Space
OS1	Provision of Open Space
SP15	Biodiversity and Geodiversity
EN8	Pollution and Land Instability
W3	Waste Management in New Development
TR1	Transport Proposals
TR2	Design and Access of New Development
BE1	Design
SP21	Built Environment and Historic Heritage

BE2	Buildings of Local Importance
SP22	Welsh Language
WL1	Development in Language Sensitive Areas

Supplementary Planning Guidance

6.24 The following SPG are considered relevant to the proposal:

- Planning Obligations;
- Design;
- Pollution;
- Open Space and Greenspace;
- The Historic Environment;
- Schedule of Buildings of Local Importance;
- Parking Standards;
- Development and the Welsh Language; and
- Affordable Housing.

Planning Appraisal

- 7.1 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:
- The Principle of Development;
 - The Impact of the Development on the Character and Appearance of the surrounding area;
 - The Impact of the Development on Residential Amenity;
 - The Impact on Biodiversity;
 - The Impact of the Development in terms of Highways, Access and Car Parking; and
 - Any other material considerations

The Principle of Development

- 7.2 The site is located within the settlement boundary of Pontardawe and was previously used as a residential institution within a residential context. The development proposed includes residential development through a conversion and extension of the building to provide 12no. affordable flats at Ty Mawr, Llys Glanrafon, Pontardawe, SA8 4EG.
- 7.3 National policy, embodied in Planning Policy Wales and Future Wales seeks to maximise the use of land as a resource and emphasises that planning policies, decisions and proposals should promote resource efficient and climate change resilient settlement patterns that minimise land take and urban sprawl, especially through the re-use of suitable previously developed land and buildings. It also states that developments should be located so as to minimise the demand for travel, especially by private car and to ensure that all local communities have good quality housing for their needs, including affordable housing.
- 7.4 The proposed development meets the above requirements in establishing the principle for development as it represents an efficient use of previously developed, vacant building within the established urban boundary. Most notably the site will provide 100% affordable housing. The principle of developing the property has been further supported and confirmed within the pre-application response by the Council.
- 7.5 It is noted that the property is identified as a Building of Local Importance by NPTCBC for the following reason: The building has been carefully converted in order to retain its character and is the only remaining building of the original steelworks which has been

redeveloped. Given the vacant use of the site, it is considered that the development will bring an important historic property back into beneficial use with minimal impact to its character.

- 7.6 In light of the above, and as confirmed within the pre-application response, the principle of developing the site for the purpose proposed is clearly established. As confirmed under subsequent headings, it will not give rise to any significant adverse impacts upon the character of the area, local amenities, and highway safety whilst providing a contribution to the area's housing land supply requirements.

The impact of the development on the character and appearance of the surrounding area

- 7.7 Given the nature of the development as a conversion of the use of the existing building, including a proposed extension, it is considered that the impact on the character and appearance of the surrounding area will be minimal. The proposed extension has been carefully designed to ensure that it complements the existing locally important building and surrounding area. This has been done through the choice of materials, which are considered to match the building as well as possible. The design of the extension has been subject to detailed pre-application advice which included revisions to ensure the new addition sensitively integrates into the existing character of the site.
- 7.8 The property will remain as two storeys and as such is not considered out of keeping with the surrounding residential context which comprises predominantly 2 storey dwellings to the north, east and south of the site.
- 7.9 Overall it is considered that the proposal would not have any significant adverse impact upon the visual amenities of the area and as such complies with LDP policies SP21, BE1 and BE2.

The impact of the development on residential amenity

- 7.10 The layout is considered to demonstrate that the site is capable of being developed with no detrimental impact toward existing residential properties. The existing properties adjoining the southern, eastern and northern boundaries do not present a significant constraint to the site. This allows for sufficient distance to be maintained between existing and the proposed dwellings.
- 7.11 Overall the impact of the proposal towards residential amenity is considered to be negligible, given that the majority of the property will

remain as existing and as such the proposed development would not have any significant adverse impacts on the amenities of future and neighbouring occupiers by virtue of any overbearing, overshadowing or overlooking effects.

- 7.12 In addition, pre-application discussions have taken place with planning officers to ensure that the proposed layout maximises the density of the property without compromising the living conditions of its occupants, through a sensitively designed extension to the property.
- 7.13 Overall it is considered that the proposal would not have any significant adverse impact upon the residential amenities of existing or future occupiers, in line with Policy BE1 of the LDP.

The Impact on Biodiversity/Landscaping

- 7.14 Given that the property has been unoccupied for a number of years, a bat survey has been conducted. An internet data search confirmed that there were no records of bats onsite with only two records of Pipistrelle Pipistrellus sp. Identified within a 2km radius. However, multiple records of bats were identified within 5km of site, the majority of which were comprised Pipistrelle sp. with smaller number of Myotis sp. and a single Greater Horseshoe bat Rhinolophus ferrumequinum record.
- 7.15 Further, a daytime survey confirmed the structure was generally in a good condition with very limited potential bat roosting features associated with a single broken ridge tile on the south western extent of the roof and small gaps under the rear porch roof. No evidence of roosting bats was identified externally. It was confirmed that the limited potential bat roosting features and absence of bat roosting evidence meant the structure was considered to be of low bat roosting potential (BCT, 2016) and the proposals will not negatively affect protected species at the site.
- 7.16 As detailed above, landscaping is a critical element of placemaking. As such, the proposal makes provisions to retain as much greenspace as possible throughout the site and retains all trees of significant value. The greenspace creates useable amenity space for future residents of the apartment block. It is therefore considered that the proposals comply with Policies SP15 and SP16 of the LDP.

Access and car parking

- 7.17 The site is considered to be located within an accessible and sustainable location, supported by a range of active travel services including bus stops and cycle routes adjacent to the site.

7.18 The existing vehicular site access is proposed to be closed off from Ynisderw Road. A new opening in the existing hedgerow to the south east of the site is proposed to form a new access off Llys Glanrafon into parking courtyard. The proposed access points are considered acceptable in regard to highway safety.

7.19 In relation to car parking, 12 spaces are proposed, extending the existing provisions. NPT locates the site within Zone 2 Town Centre or City Centre Fringe and is the most sustainable location within the authority as there are no zone 1 locations. The authority operates maximum standards and accepts sustainability appraisals to reduce parking provision. The indicative layout shows 6 x 2bed and 6 x 1bed as such would have a maximum requirement of 18 spaces with 2 visitor. In terms of sustainability the following points could be achieved:

Local facilities

- Lidl within 200m
- Cwmtawe school within 200m
- Pontardawe Dental Centre within 400m
- 3 facilities within 400m = 4 points
- Bus Stop within 300m = 3 points
- Cycle route within 100m = 1 point
- Frequency of bus route every 10 minutes = 2 points

Total points = 10 points

7.20 This allows for a reduction of 2 spaces per dwelling. It is noted that the reductions in parking requirement for residential units shall not result in less than one parking space remaining. With 2 beds requiring 1 space, the development would require 12 spaces. Notwithstanding this the site is considered to be in a highly sustainable location with realistic opportunities for active travel and public transport.

7.21 It is noted that 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. A lower car ownership level is anticipated within this development. Albeit the sustainable credentials of the site already justify a reduction in this respect. As such, it is considered that the access and parking arrangements are in line with LDP Policies TR1 and TR2.

Any other material considerations

Flooding and Drainage

- 7.22 A review of TAN 15 Development Advice Maps shows the site to be located within Flood Zone C1. As such, the area is served by significant infrastructure, including flood defences and flooding is not considered a concern to the proposed development.
- 7.23 Notwithstanding, this application is supported by a Flood Consequence Assessment, as requested at pre-application stage. The FCA states that the proposed development is classed as highly vulnerable development by TAN-15. However, the change in planning classification from C3b to C3a could see a reduction in the vulnerability of the occupants and therefore a lowering in risk.
- 7.24 The NRW flood maps show the majority of the site has a very low risk of flooding from surface water and small watercourses, meaning that most of the site has less than a 1 in 1,000 (0.1% AEP) chance of flooding from this source. A small area of the site along the edge of the existing building has a 1 in 1,000-year (0.1% AEP) chance of flooding. The site is not at risk of tidal, groundwater, sewer, or reservoir flooding.
- 7.25 Detailed flood modelling has been completed in 2021 to provide an improved understanding of flood risk to the site. This has informed the building finished floor levels being set to 32.6mAOD so that the development will be flood free in the 1% AEP plus climate change event and flood to a maximum depth of 0.58m in the 0.1% AEP event.
- 7.26 An assessment of the Justification Test and Acceptability Criteria has been undertaken, with all aspects found to be satisfied for the site. The FCA therefore concludes that on the grounds of flood risk, the proposed development site is compliant with the aims and objectives of Planning Policy Wales, TAN-15 and Policy BE1 of the LDP.
- 7.27 In addition, as the proposal comprises 12 dwellings, there is a requirement to comply with national statutory SuDS standards. The layout is considered to demonstrate there is sufficient space within the site to accommodate a scheme for surface water drainage that can be compliant with standards. The strategy is subject to SAB approval.

Trees

- 7.28 This application is supported by an Arboricultural Report, prepared by ArbTs Ltd, which confirms that no Category A or B trees are located on site, whilst a number of Category C and one U trees are identified.

- 7.29 A small number of trees are identified to be removed to facilitate the construction of the proposed development design (3 individual trees and 21 metres of boundary hedgerow). All of these individual surveyed trees identified for removal are low or poor quality (C or U Category). These trees should not present a constraint on developing the site and their loss will not cause an adverse impact onto the amenity of the area.
- 7.30 The report outlines that RPA potential damage can be managed through the installation of tree protective fencing as designed by an Arboriculturist and will ensure that no significant long term adverse impact will occur to any of the retained trees.
- 7.31 The construction of the proposed development, whilst complying to the tree protection scheme within the report, will ensure that no significant long term adverse Arboricultural impact occurs onto the health of any retained trees on or adjacent to this site or to the long term amenity of the area.

Noise

- 7.32 Given the location of the residential property adjacent to a supermarket and delivery bay, a Noise Impact Assessment, prepared by Acoustic Consultants Ltd supports this application. The pre-application also requested this report as part of the full submission, following comments by the Environmental Health Officer.
- 7.33 The assessment concludes that the site falls into Noise Exposure Category A, which states:
- "Noise need not be considered as a determining factor in granting planning permission, although the noise level at the high end of the category should not be regarded as desirable."*
- 7.34 Mitigation has been provided to control internal ambient noise levels likely to impact upon the site. With the proposed fabric construction and suitable ventilation provisions applied to the dwellings, the predicted internal equivalent noise levels due to road traffic are comfortably within the recommended BS8233:2014 noise criteria.
- 7.35 When assessed in accordance with the methodology of the BS4142 initial estimate, industrial noise exceeds the existing background noise during the permitted Lidl delivery hours by +8 decibels. This means that the rating sound level *may* result in a significant adverse impact on the proposed dwellings. However, when the context of the site (i.e.

mitigation measures) is considered and internal absolute levels due to Lidl deliveries are predicted, it is clear that good acoustic conditions can be achieved in accordance with BS8233:2014 criteria, whilst providing ventilation to prevent the need for open windows for rapid/purge ventilation on the façades directly overlooking the Lidl store.

- 7.36 It is therefore considered that the noise from the Lidl store can be suitably controlled and is considered to be of a low impact on the proposed dwellings, and as such Policies BE1 and EN8 of the LDP and the aims of PPW are considered to be met in terms of noise.

Air Quality

- 7.37 This application is supported by an Air Quality Assessment, prepared by Air Quality Consultants. As outlined previously, the site is situated within the nickel exceedance area. The data available suggests that the site is at high risk, which is unfavourable for residential purposes given possible risk of nickel exposure to residents and subsequent negative health effects.
- 7.38 Given the existing use of the site as a residential institution, it is not considered that the risk will be intensified as a result of the proposed development. The report summarises that the proposed development will not generate any significant additional traffic on the local road network and therefore there will be no significant effects at any existing, sensitive receptor.
- 7.39 The application site is on a quiet road, and the assessment has demonstrated that future residents of the proposed development will experience acceptable air quality in relation to nitrogen dioxide and particulate matter concentrations, which are expected to be well below the relevant air quality objectives.
- 7.40 The main source of nickel emissions in the local area has been identified as the Wall Colmonoy site and it is understood that the operator (Wall Colmonoy), Neath Port Talbot County Borough Council (as the permitting authority) and Natural Resource Wales are working together with the aim to reduce nickel emissions from this site.
- 7.41 Given the potential for exposure of future residents to nickel concentrations exceeding the Target Value, the report recommends that a mechanical heating, ventilation and air conditioning (HVAC) system with high-efficiency particulate air (HEPA) filters is installed at the proposed development to provide appropriately filtered and

conditioned air to all habitable rooms, without recourse to opening the windows. Provided an adequately designed HVAC system is installed and appropriately maintained, the exposure of future residents to nickel concentrations will be reduced, such that residual effects are judged to be 'not significant', in line with Policy EN8 of the LDP.

- 7.42 To conclude, the proposed development will result in a high-quality environment which contributes to local distinctiveness and a sense of place, leading to regeneration benefits for the wider area in accordance with the site's vision and brief.

Conclusion

- 8.1 This Design and Access Statement (DAS) has been prepared on behalf of Pobl Group to accompany the full planning application for the proposed residential development for conversion and extension of building to provide 12no. affordable flats at Ty Mawr, Llys Glanrafon, Pontardawe, SA8 4EG.
- 8.2 As established, the site is located within the settlement boundary and an existing, sustainable, residential context. By virtue of the pre-application enquiry, it is evident that the principle of residential development is accepted by the Local Planning Authority.
- 8.3 The amount, scale, layout and appearance of the proposals have been discussed throughout this document and are considered to be in keeping to the surrounding area. The proposal is considered to make full use of the site's opportunities and minimises any constraints as far as is practicably possible.
- 8.4 In light of the above, it is considered that the proposed development has suitably addressed the key material considerations for this site and its approval would provide a quality development that would complement and enhance the existing residential context. The proposals make use of a locally important, vacant property in a sustainable location.
- 8.5 Consequently, it is considered that this Planning, Design and Access Statement clearly demonstrates that the scheme, as present, complies with the relevant national and local planning policies.
- 8.6 As such, it is respectfully requested that Neath Port Talbot Council grant full planning consent for the proposed residential development for conversion and extension of building to provide 12no. affordable flats at Ty Mawr, Llys Glanrafon, Pontardawe, SA8 4EG.