

Supporting Statement for a Detached Dwelling

4 Dwellings and Footpath Link Forest Lodge Lane Cwmavon, Port Talbot



June 2022

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1.0 Scope of this Document

- 1.1 I am instructed by the applicant to provide a supporting statement to set out the planning merits that support the development of the site for 4 detached residential dwellings and a pedestrian footpath link.

2.0 The Site

- 2.1 The site application is located to the east of the settlement of Cwmavon off Forest Lodge Lane.
- 2.2 The application is within settlement limits and is to the north of the existing Forest lodge land self-build development and an allocated residential site (*H1/LB/1*).

3.0 The Proposal

- 3.1 The proposed development consists of 4 large, self-build residential property which follows the established pattern of development along Forest Lodge Lane.

4.0 Policy

- 4.1 Local Policy - The development plan for the site is the Neath Port Talbot Local Development Plan 2011-2026. The Council adopted the plan on January 2016.¹

4.2 Relevant Policy

SP15 Biodiversity and Geodiversity

SP20 Transport Network

¹ <https://www.npt.gov.uk/7328>

SC1 Settlement limits

EN6 Important Biodiversity and Geodiversity Sites

BE1 Design

Planning Policy Wales (Edition 11)²

4.2.12 As part of considering housing delivery options, planning authorities should understand the contribution that all sectors of the housing market and house-builders could make to meeting their housing requirement. When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs) and the custom and self-build sector, the opportunity to contribute to delivering the proposed housing requirement.

4.2.13 To assist in broadening the housing delivery options and enable the provision of housing by RSLs, SMEs and the custom and self-build sector, planning authorities should set a locally determined target for the delivery of housing on small sites. To facilitate this, planning authorities should maintain a register of suitable sites which fall below the threshold for allocation in their development plan. Planning authorities should also work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

4.2.14 When promoting self-build and custom build development, planning authorities must consider all relevant policy options including the use of Local Development Orders (LDOs) and site specific design codes to simplify the planning process and enable housing development to be brought forward more quickly.

² https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf

5.0 Appraisal

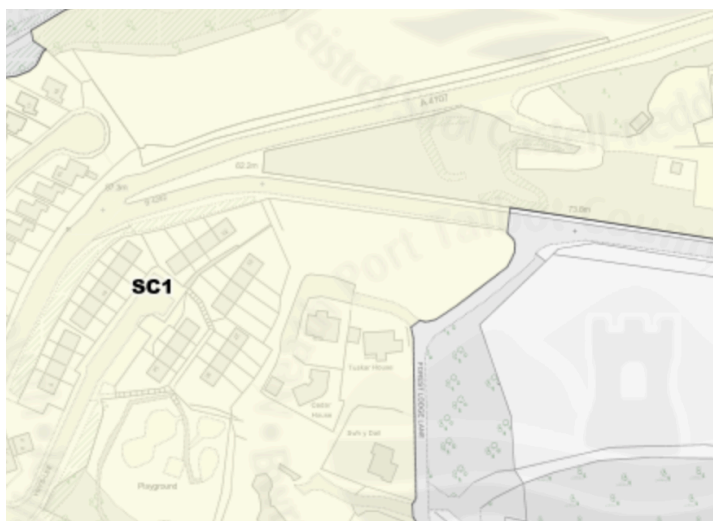
5.1 Background

5.2 In January 2020 the applicant submitted a pre app in respect of the site reference Q2019/5121.

5.3 The comments were generally positive however concerns were raised over the scale/height of the proposed dwelling relative to the highway. In addition, the Council requested that justification be provide to supported the proposed density having regard to the requirements of Policy BE1. These matters will be addressed further in the assessment

5.4 The application site is located to the east of the settlement of Cwmavon at the southern end of Forest Lodge Lane. The dwelling will form part of the Forest Lodge Lane development which is an allocated site within the LDP (*H1/LB/1*) as shown in **Figure 1** below

Figure 1



- 5.5 The dwellings will be within settlements limits and as such is acceptable in principle
- 5.6 As indicated, at the pre app stage, concerns were expressed by the LPA over the height of the dwellings relative to the adjacent highway. The pre app submission showed a 3 storey split level house.
- 5.7 The scale of the proposed dwellings, particularly when viewed from the main highway is very much dictated by the topography of the site. From North to south the application site rises from 68.25m to 75m (6.75m) over a distance of approximately 36m. In addition, the site rises from west to east, along the highway boundary, from 64.3m to 72m (7.7m). The siting of the proposed dwellings are dictated by the need to ensure adequate separation from the existing dwellings to the south and provide suitable private amenity space to the north. Having established a suitable location for the dwellings, which have been dictated by the above issues, the finished floor level is again set by the need to provide a driveway with a maximum gradient of 1:9. Having to work within his tight development constraints dictates that we are unable to reduce the height of the dwelling any further
- 5.8 Notwithstanding the above, to address the Council's concerns, the height of the proposed dwelling has been significantly reduced. The front elevation has the appearance of a dormer bungalow with the rear elevation having the appearance of a two storey dwelling.
- 5.9 As the rear elevation faces onto the highway particular attention has been given to its design to ensure that it has a live frontage. To that end it has a symmetrical design with central doors
- 5.10 It is recognized that, as set out in the Council's pre app comments, that the proposed development, will fall below the density requirements set out in Policy BE1.

5.11 However, it is considered that in this case the proposal is justified having regard to the following matters

- Site Constraints
- Character and Appearance of the Area
- Demand

5.12 **Site Constraints** - The application site has a number of constraints in relation to slope, access, trees and overlooking from neighbouring properties. The developable area is therefore a narrow corridor running down the centre of the site.

5.13 In their pre app response the Council indicated that 13 dwellings were required on the larger site. This would require a highway and footway of at least 7.5m a minimum and a minimum of 26 car parking spaces. This is not achievable.

5.14 **Character and Appearance of the Area** – The application site is at the entrance to the Forest Lodge lane development. This is a development of very large, self-build, detached dwelling in substantial grounds. Given the location of the proposal in relation to the wider Forest Lodge development it is considered that a high density development, as required by policy BE1, would be out of character with existing settlement pattern. The prominent location of the site adjacent to the highway would amplify the uncharacteristic appearance of a high density development. As such it is considered that having regard to the location of the site in respect of the existing development and the highway the density of dwellings is acceptable.

5.15 **Demand** - Paragraphs 4.2.12 - 4.2.14 of Planning Policy Wales places a responsibility on LPA's to provide land for a wide range of housing which specifically includes self-build. It is clear that the imposition of the densities required by Policy BE1 will move the development character into standard market housing where there is clearly adequate supply in the local area and wider County. Moreover, the result would be less self-build sites contrary to the requires of Paragraphs 4.2.12 - 4.2.14 of Planning Policy Wales

- 5.16 To understand the significant value of this proposal it is important to have broader understanding of the wider housing market.
- 5.17 As with previous reports the LDP Annual Monitoring Report (October 2020)³ (AMR) sets out a worrying trend in housing delivery across the County Borough. Page 5 of the report sets out that 2338 new homes have been delivered since 2011 (45% below the cumulative target) with 68 affordable homes being delivered (88.7% below the cumulative target)
- 5.18 Given the large short fall in housing delivery which, would appear to mainly within larger sites, a revised approach must be taken in promoting smaller, deliverable sites such as this site.
- 5.19 The number of small sites within the LDP are projected to deliver 810 dwelling which is 9.24% of the overall total. Therefore, in simple terms for every 1 dwelling on a small site 10 should be built on larger sites.
- 5.20 The number of completions within the two housing categories of large and small site show an interesting trend. As set out in **Table 1** below

Table 1

Year	Large Sites	Small Site	Total Completions	Percentage contribution by Large sites	Percentage contribution by small sites	
13/14	262	39	301	87%	13%	
14/15	344	57	401	86%	14%	
15/16	231	19	250	92%	8%	
16/17	166	12	178	93%	7%	
17/18	113	35	148	76%	14%	
18/19	245	54	299	82%	18%	
19/20	186	26	212	87%	13%	

³ <https://www.npt.gov.uk/media/14629/local-development-plan-annual-monitoring-report-october-2020.pdf?v=20201030162145>

Total	1547	242	1789	86%	14%	
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- 5.21 It is clear from the information above that housing on smaller sites are being delivered at a faster rate. In the last 3 years of the 659 dwellings completed 115 (17.5%) were completed on smaller sites.
- 5.22 With 17.5% of completions arising from small site compared with a projected figure of 9.24% it is clear that the small site and self-build market is buoyant. This is an accurate reflection of the local market. There are two self-build sites currently being developed in Bryn and at Forest Lodge there are five dwellings under construction, three (including this one) in planning and a further two due within the next 2 months. **In contrast 2 dwellings have been constructed at Coed Darcy in the last two years.**
- 5.23 It is clear from the above evidence that smaller sites and particularly Forest Lodge Lane has proven itself resilient to the poor condition of the Housing Market with in County Borough.
- 5.24 It is clear from the above evidence that smaller sites and particularly Forest Lodge Lane has proven itself resilient to the poor condition of the Housing Market with in County Borough.
- 5.25 **Ecology**
- 5.26 The application site has been the subject of two separate ecology surveys. The initial report suggested a reptile survey which subsequently highlighted high number of reptiles.
- 5.27 It is recognised that in order to develop the site reptiles will need to be translocated. Two possible receptor sites have been identified and one has been chosen as a future receptor site. This has been surveyed and a further report provided to demonstrate its suitability.

6.0 Conclusion

- 6.1 The application site is within settlement limits where the principle of development is acceptable.
- 6.2 Whilst the density of the development is below the criteria set in Policy BE1 having regard to the character and appearance of the neighbouring development, the high demand for self-build plots in the area, the economic benefits derived from the development and the deliverability of the proposal it is considered that the development is acceptable.
- 6.3 Whilst there is evidence on matters of ecological importance these are not nationally or locally significant. The applicant has provided evidence to indicate that reptiles on the site can be translocated and there is likely to be an overall enhancement in ecology.