

Design and Access Statement

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

DAS-100

Date	Revision	Comment
25.06.2022	-	
24.10.2022	A	Item 4.4.4 <i>Affordable Housing</i> updated to incorporate a discussion with the Planning Officer regarding an alternative viable option for the two affordable units.



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1.0 Introduction

This Design and Access 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 application 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.

A SuDs Approval Body (SAB) application was also submitted, reference number: SP2021/0021.

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)*
- *Local Development Plan, 2011–2026, Affordable Housing, Supplementary Planning Guidance (October 2016)*
- 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:
- Technical Advice Note 12: Design
- Technical Advice Note 2: Planning and Affordable Housing
- 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
- Technical Advice Note 11: Noise
- *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
- A1-102: Existing Landscape Plan
- 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
- A1-205: Comparison Site Plans
- DAS-100: Design and Access Statement
- FRA-100: Flood Risk Assessment
- PS-100: Planning Statement
- ES-100: Environmental Statement
- Roosting and Nesting Report
- Bat and Nesting Bird Survey Report
- Cover Letter
- Planning Application (via planning portal)

1.1 The 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 The 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

Prior to being Neath Care, it was formally known as Neath Port Talbot Care Co-Operative Ltd., between 24 Jun 1996 - 24 Mar 2021. From 31 March 2021 to May 2021, it became Neath Care providing social work activities without accommodation for the elderly and disabled. It was set-up as a commercial enterprise. The previous owner of Neath Care, acknowledged this area has been over saturated with care home facilities and was making consistent losses over the previous several years, and realised this particular facility was no longer a viable business.

The application/proposal site, 96 Gnoll Park Road, SA11 3DD, was formally Neath Care. The change of use has been determined by the shortfall of habitable properties in a predominantly residential area with public transportation connections. 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. 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.

- 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. The only listed property is the Llewellyn Almshouses, situated along the end junction intersecting Leonard Street with Gnoll Park Road.

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.

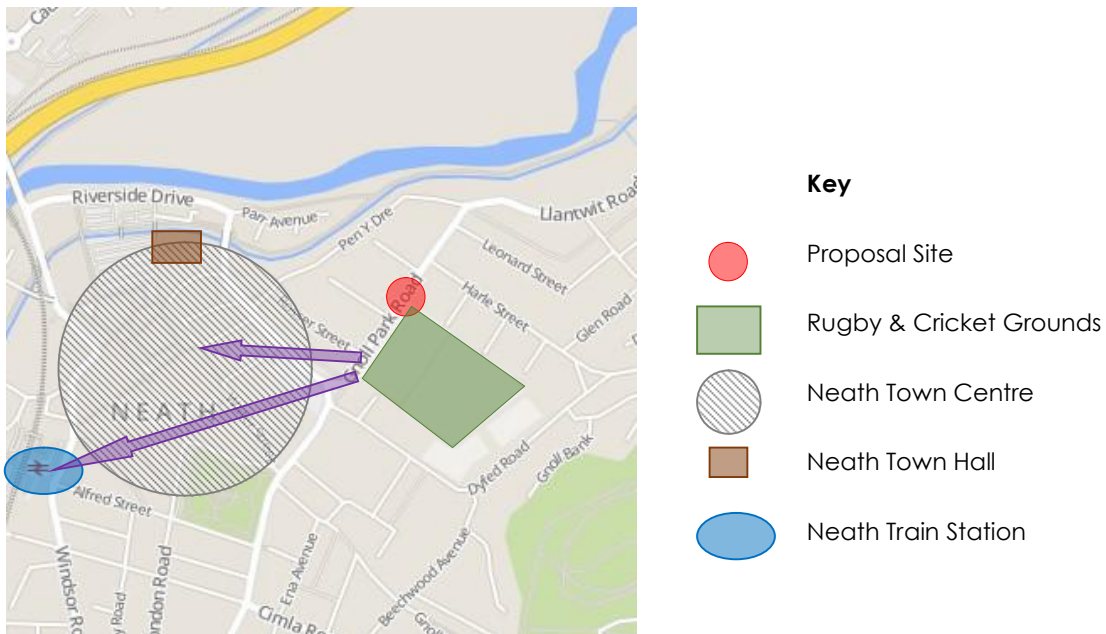


Figure 2 Proximity to Local Amenities from Proposal

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 pedestrian access points to the rear of the site is off Park Street and Hibbert Road.



Figure 3 Access Plan

2.4 Existing Site Boundaries

Limited impact will be made beyond the property boundary. The boundary demise is separated by an existing brick and concrete blockwork wall shown in Table 2: *External and Internal Building and Property Conditions*. It provides sufficient privacy and protection from outside the boundary.

2.5 Site features / Topography

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 the neighbours, 92-94 Gnoll Park Road, this proposal will also utilise the external space to extend the property of the site without causing unnecessary obstructions.

2.6 Public Transportation

Due to the proposal's location, close to the Neath Town Centre and associated amenities, all intentions would be to utilise public transportation and walk when appropriate.

A 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 Condition and Local Context

This application aims to reuse existing materials and make good wherever reasonably viable and possible. The following visual information shows just a small aspect of the condition the property is both externally and internally. This is by no means not a thorough intrusive survey, but provides sufficient detail as to the current state of the property and site.

Table 2: External and Internal Building and Property Conditions

Comment	Photograph	Comment	Photograph
External Victorian period frontage Good level of detail that appears maintained		Post applied side entrance	
Exterior rear façade where works required to age and weathering		Existing side access route to the decrepit shed	
Post installed brick wall between the back of shed and existing stone boundary wall		Stone wall adjoining the back rear boundary wall	

Rear boundary wall		Exterior repair and upgrade required due to cracking and movement	
Exterior repair and upgrade required		Possible leakage points at junction of new and old roof	
Broken pipework. Damage to the brickwork		Exterior repair and upgrade required due to cracking and movement. External pipes insecurely fixed	
Cracking and movement in the loft ceiling area		Cracking at window opening and sills	
Further cracking and movement in the ceiling area		Attic Store Room	
Detail 1: New roof trusses have been post-installed.		Detail 2: New roof trusses have been post-installed.	

3.1 Making Good to Current Standards

Upon carrying out the conversion to the existing property, all the areas of neglect, damage and weathering will be revitalised and brought up to current standards. This would be the ideal time to make good these areas of concern.

3.2 Character and Appearance (Criterion 1)

From the Design SPG, Character and Appearance (Criterion 1) states that, '*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*'.

The following street plan, Figure 5, shows the different types of properties along Gnoll Park Road.



Figure 4 Location of Dwellings along Groll Park Road Denoting Form and External Materials

Reviewing item 4.1.1 of the *Design Supplementary Policy Guidance*, this proposal aims to show that every effort has been made to respond and respect the characteristics of the local area. Hence, from the visual assessment of the neighbouring properties along Groll Park Road, Figure 5, the study investigated the types of massing, density, forms and materials that showed the palette of external finishes, colours and classification of properties.

Item 4.1.3 states, *"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'".*

Item 4.1.2 encourages formal and informal spaces to be created through a variation providing visual interest and legibility. Key junctions and buildings can be identified to provide '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.*

From the above guidance, and analysis of the local aesthetics, it is apparent there is scope to utilise aspects of 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.

4.0 Planning Policies

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)*
- *Open Space and Greenspace Supplementary Planning Guidance (July 2017)*
- The Town and Country Planning (GPDO) (Amendment) (Wales) Order 2008, No 2336:
- TAN 12: Design
- TAN 15: Development and Flood Risk
- TAN 16: Sport, Recreation and Open Space
- TAN 21: Waste
- TAN 22: Planning for Sustainable Buildings
- TAN 6: Planning for Sustainable Rural Communities
- TAN 2: Planning and Affordable Housing
- TAN 11: Noise
- Llywodraeth Cymru/Welsh Government, *Beautiful Homes and Spaces*, July 2020

4.1 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."*

4.2 Five Objectives of Good Design

The diagram below, extracted from *Design Supplementary Planning Guidance*, summarises the five objectives of good design that should be taken into account when preparing a DAS. The 5 design criteria are shown below and addressed in section 6.0 Design:

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



Figure 5 Objectives of Good Design

The proposal demonstrates in section 6.0 *Design*, 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.

4.3 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.

4.4 Addressing Pre-Planning Advice: Q2021/0133 and Application P2021/112 Comments

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:

4.4.1 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 extremely important to not impact and add visual/physical density along the Gnoll Park Road. This was further determined by utilising the existing vehicle access from the Gnoll Park Road to the back of the property. Although not as large or densified as the neighbouring property, 94 Gnoll Park Road, the massing was determined and influenced by this neighbour's large back extensions and considerable increase in volume.

4.4.2 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. This not only helped to eliminate privacy issues but forges a link between both properties and enhances their association within the plot.

4.4.3 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 distances to Neath town centre. Public transport is also regularly available as bus stops are located just outside 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 a 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.

With regards to pedestrian and vehicle access, *Figure 9, Landscape Section and Plan*, addresses the comments made by the Highways and Drainage Officer. It shows that there are 2 secondary pedestrian access points to Hibbert Road and Park Street.

4.4.4 Affordable Housing

According to the Government's Definitions of general housing terms: Affordable housing is social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined by local incomes and local house prices.

This term suggests one who cannot afford to pay market prices due to social factors and circumstances that are viewed as falling into poverty, are homeless, cannot find work, are benefit claimants and so forth. These very social issues deter such peoples living standards are adequately met. Therefore, to own a vehicle under these circumstances, would be deemed as unreasonable and inappropriate when public transport is readily available. This situation has been noted in 7.3.3 Carparking and Cycle Parking Standards, in terms of appropriate allocation of parking spaces.

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's 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.

Also, due to the nature of the development, an alternative viable option is to pay a contribution and take possession of the two units re-establishing them as private ownership. Sensibly, this would depend on the amount of contribution requested.

4.4.5 Open Space Policy OS1 Open Space Provision

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

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		37%

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.

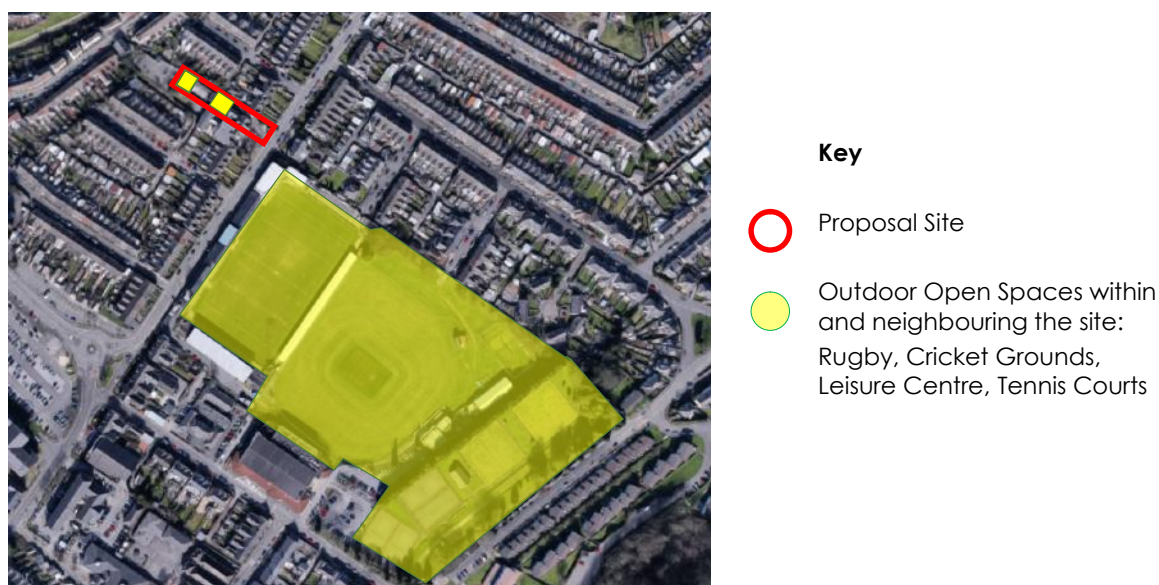


Figure 6 Outdoor Public Spaces Within the Site and Neighbouring to the Proposal

4.4.6 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.

An accompanying bat survey was carried-out by Acer Ecology, Preliminary Roost and Nesting Bird Assessment, October 2021. In chapter 3. Results, 3.1.1. *Bat Roosts Reported in Planning Applications Within the Same Postcode*, the report states: *The planning portal search returned no bat roost records within the same postcode area as the proposed development.*

The result is unsurprising bearing in mind the occupancy was used as a healthcare provider. However, all considerations will be made with future progress to the property.

4.4.7 SuDs Approving Body, SABS, Application

A SABS application was submitted, reference: SP2021/0021

4.4.8 Required Supporting Documentation

Having regard to the nature of your proposal, it is considered at this stage that in addition to the submission of standard mandatory supporting documentation such as application forms, plans and fee, any application for the above development should also be accompanied by the following additional documentation: -

- Bat Survey: see accompanying Bat Survey Reports

Synopsis of the Roost and Nesting Assessment Reports:

Three bat surveys have been carried-out on the property in line the recommended bat survey times and requirements.

1. The initial survey by Acer Ecology was undertaken on the 4/10/2021, concluded no roosting or nesting had/had taken place.

2. Second and third survey by *Grounded Trees* took place in May and June 2022, and also concluded no roosting or nesting was evident. However, mitigation recommendations have been included as a back-up.
- *Justification for any reduction in parking requirements:* see 2.6 Public Transportation, 7.3: Vehicle Access and Carparking Standards and 7.4 Movement and Environmental Sustainability.

5.0 Relevant Planning Applications and Associated Information

The proposal was only considered subsequent to studying and investigating the need for self-contained flats in the area.

5.1 Relevant Planning Applications

The following information shows relevant proposals that have had similar planning applications consented, along with information obtained from having discussions with local Estate Agents about the requirement for additional accommodation in this area.

Table 3: Relevant Planning Applications

Planning Ref No	Description	Decision
P2020/0626 90,92-94 Gnoll Park Road Neath SA11 3DD	Change of use from dwellinghouse (Class C3) to residential care home (Class C2) to extend the facilities at No 92-94 by increasing the number of rooms from 34 to 48 including a part two storey part three storey rear extension and a part single storey rear extension which will provide a dining area, additional parking and bicycles bays to the front. (Amended Plans Rec 29/10)	Approved
P2018/0504 29 Gnoll Park Road, Neath, SA11 3BT	Change of use from single dwelling into two, two-bedroom self-contained flats, two sheds, boundary treatment, new access and two car parking spaces together with associated external alterations	Approved
P2016/0903 27 Gnoll Park Road, Neath, SA11 3BT	First floor flat roof extension to provide additional communal sitting room plus covered walkway	Approved
P2014/1008 4 Gnoll Park Road, Neath, SA11 3BP	Change of Use from Office (Class A2) to single dwelling (Class C3) plus installation of new door to rear elevation.	Approved
P2014/0183 33 Gnoll Park Road, Neath, SA11 3BT	Change of use from residential dwelling to two self-contained flats.	Approved
P2004/0227 92-94 Gnoll Park Road, Neath SA11 3DD	Extension to care home for elderly	Approved
P2003/0548 92-94 Gnoll Park Road Neath SA11 3DD	To expand on the current 15-bedroom residential home for the elderly to 16. To build a single storey extension which will incorporate a new kitchen office and storage facilities.	Approved
P2000/0029 96 Gnoll Park Road Neath SA11 3DD	Offices for Neath Care	Approved
N1991/0696 21 Gnoll Park Road, Neath, SA11 3BT	Conversion of single dwelling into two self-contained flats and construction of new double garage in rear	Approved
N1989/0460 85 Gnoll Park Road, Neath, SA11 3BU	Two storey extensions of existing house	Approved

5.2 Local Estate Agent Responses

Following contacting local estate agents in Neath, the responses showed that the need to increase the typology of property along Gnoll Park Road. There is a shortfall in accommodation along Gnoll Park Road. Alternative accommodation to houses would be welcomed. Additional good quality, self-contained flats would help in diversifying the accommodation typology and mix in the area.

The potential for the additional variety/mix of properties would be also seen as an extension to the reach of the city centre, which thereby increases the size and investment in Neath.

The following table shows the responses from discussions about the viability of including new flats onto Gnoll Park Road, and shows a positive snapshot that good design flats would be a positive addition.

Table 4: Responses from Local Estate Agents

Estate Agent	Comment
Alison George Sales & Specialist Lettings	Good location for accessibility to Neath town and the train station. Flats need to be of good quality.
Herbert R Thomas	Good location as there is a demand for such properties. Having off-street parking is also a great asset. Flats should be good quality and representative of the location.
Welven	Good location. Flats should be good quality and representative of the location.
Payton Jewell Caines	Good location. Flats should be good quality and representative of the location. Having off-street parking is very good.
Huxtable Estates - Estate Agents	The location is close to the town hall, city centre and train station. Having off-street parking is advantageous.

Another aspect discussed was the difficulty in renovating the existing property as a single-family dwelling. The property's size would have an impact as it would be unsustainability. The use of more power/energy, and its upkeep will prove too expensive in heating and maintaining spatial volumes within the property.

They all agreed that the plot is located a good proximity to the town centre, train station, local amenities and the local stadium and sports facilities. The change of use from a single building to self-contained flats validates rejuvenating the property.

The need for additional variety/mix of property typologies in this area would be welcome as it extends the reach of Neath beyond the city centre, which increases its growth and diversity that towns require for self-sustainability and future expansion. Hence, this proposal is regarded as a positive addition to the local area.

6.0 Design

This proposal takes reference from Llywodraeth Cymru/Welsh Government's, *Supplementary Policy Guidance: Design and Beautiful Homes and Spaces* (BHS). It encourages 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. This application also aims to reuse existing materials and make good wherever reasonably viably and possible.

6.1 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."*

6.1.1 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.

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

Best practice also considers 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.

6.1.2 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

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. (see 6.3 *Massing and Spatial Awareness*).

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.

6.1.3 Homes should be safe and secure

As with all conversions and new design, this proposal will incorporate elements that are applicable ensuring the occupants are safe and secure. Such features as visual CCTV entrance cameras, ease of accessibility throughout the site, 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.

6.2 Maintaining Access and the Boundary

The front of the site faces onto Gnoll Park Road. The proposal continues to utilise the principal pedestrian and vehicle entrance off Gnoll Park Road, with secondary access made via the neighbouring Hibberts Road and Park Street.

The back of the site faces onto an empty concrete hardstanding area. The site boundaries comprise brick and concrete blockwork walls. They remain unchanged but made good and aesthetically more pleasing.

The proposal does not alter or affect the current boundary and ownership conditions, nor does it affect the rights of light and privacy issues. The separation distances are above the minimum requirements and the proposal's principal faces into the site or onto the street.



Figure 6 Site Boundary and Conditions

6.3 Massing and Spatial Awareness

The proposal has been designed to reflect the requirements associated with 3 x (1-bedroom) and 5 x (2-bedroom) flats. This application acknowledges the neighbours recently converted, large extended building, ref: P2020/0626 and P2003/0548, as a precedence.

This proposal has studied no 92-94 GPRs massing and scale, however, maintains continuity with this application's form.

It does not extend nor bulk-out as 92-94 GPR, but instead stays in keeping with the extent of the existing property lines.

This proposal also does not extend towards no. 98 GPR, but maintains its distance, width and access, which therefore prevents creating another terrace block.

It instead respects the semi-detached nature of its neighbour through visual appearance and open spatial awareness as before. Thus, the proposal stays in keeping with the character of the local vicinity.

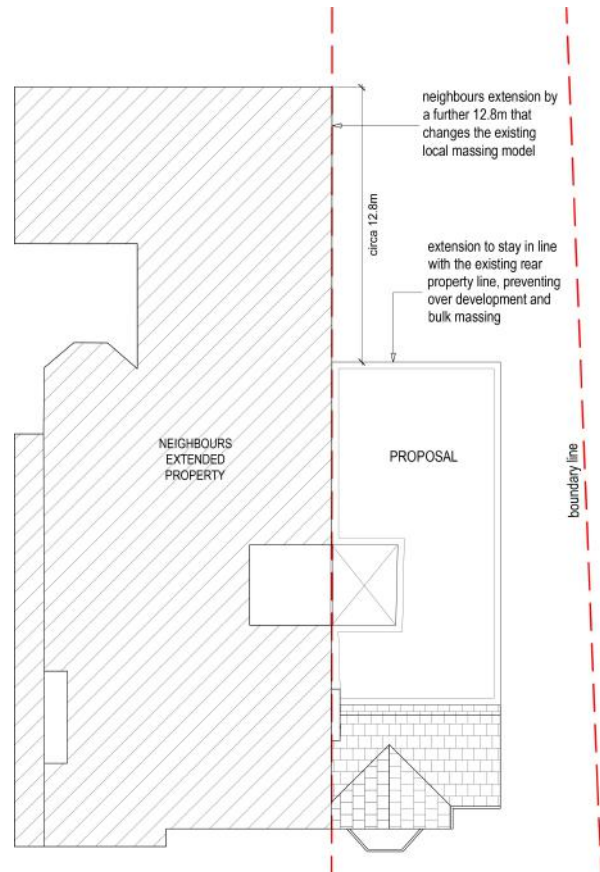


Figure 7 Massing Comparison with Neighbours

The standards influencing the proposal have included:

- The proximity to existing surrounding buildings and the layout has been carefully considered to minimise the impact of the development upon neighbouring vicinity and amenities.
- The proposal is viewed as a domestic scale development, through the introduction of a roof ridge heights that mirror neighbouring dwellings.
- To fragment the of the extension's massing, a lightwell has been introduced. This dual-purpose intervention allows light and natural ventilation through the vertical and horizontal plan.
- The use of a stepped façade creates gables and instances for material changes, contributing to the domestic elevation treatment.
- The rear extension, though not visible from the public realm, acknowledges and incorporates the scale/ massing of the neighbouring property.
- The proposal does not include unnecessary fenestration to the elevations, which safeguards the amenity of the adjacent neighbours.
- It has remained that the existing property's pitched roof continues following the characteristic of the area.
- The location of the building does not cause any additional traffic, as vehicles continue to be off-street and less than was previously used on the plot.
- The development has been restricted to ensure that there are sufficient landscaped areas to reduce the hardstanding and enhance the natural environment.

With these design attributes, it shows that every care and attention to detail meets with the above noted planning policies.

The spatial arrangement and occupancy factors take reference from the *PART B Development Quality Requirements 2016 Proposed mandatory Standard & Guidance for new and rehabilitated housing in Wales*.

Home Designation	Home Type	Floor Area (GIA) m ²
3P2B	Flat - Walk up	65
3P2B	Flat - Common access	58
2P1B	Flat – Walk up	51
2P1B	Flat - Common access	46
1PS	Studio – Common access	

Table 5 Showing Minimum Floor Areas

The following information shows the areas within the existing property, and the proposed mix of 1- and 2-bedroom self-contained flats converted in the property. It also shows the area for the new build flats at the rear of the plot.

Existing Floors	Total (m ²)
Basement	26
Ground Floor	108
First Floor	83
Second Floor	57
Total A	278

Proposed Floors	Studio (m ²)	2P1B Flat (m ²)	4P2B Flat (m ²)	Total (m ²)
Basement				26
Ground Floor	80	42		122
First Floor		47	66	113
Second Floor		43	66	109
Subtotal				370
Proposed Rear Accommodation			3P2B Flat (m²)	Total (m²)
Ground Floor			92	92
First Floor			92	92
Subtotal				184
Total B				554

Additional New Area (B – A)	276
------------------------------------	------------

Table 6: Existing and Proposed Areas

Hence, the additional area throughout the entire plot, that includes the extension and outbuildings, is only 214m². It further shows this proposal is about quality of environment and not about over development.

6.4 Orientation

The outbuilding faces inwards towards the gardens and away from properties along Hibbert Road and Prince Street. Its rectangular form also maintains consistency parallel to other properties along Gnoll Park Road. The outbuilding has a comfortable distance of circa 28m - 30m to the existing building, and also has distances of circa 23m and 15m from properties on Park Street and Hibbert Road.

Windows are orientated south-east and north-westerly. They will receive good morning, afternoon and evening sunlight. The also face into the garden and the site mitigating any unnecessary privacy and light issues. Where potential issues of concealing bathrooms and wet areas may arise, frosted glazing will be installed to eliminate any uncertainties.

6.5 External Appearance and Materials

The following information describes the external appearance and visual aesthetics both properties aim to show.

The Existing Property and Extension

The external appearance facing Gnoll Park Road is retained and made good where weathering and aging have taken effect.

The rear extension, away from public view, takes visual precedence from the neighbour, no 92 – 94 GPR, recent extension.

- Rear elevations are a mix of timber cladding and brick giving a good contrast and softening the appearance.
- Similar to the main house, the extension roof will be of timber construction covered in dark grey 3-layer roofing felt. The black fascia's, soffits with black rainwater goods will be similar to the neighbours.
- Windows are white uPVC operable double-glazed units.
- Internally walls timber stud with a plaster finish.
- The external visual treatment will help break-up and reduce the massing and scale and respects surrounding environments visual context.
- The extension design will contribute in creating a contextual environment.

The Rear Outbuilding

With reference to the *Beautiful Homes and Places* and *Modern Method and Construction, Introducing the MMC Definition Framework* documents, this new building will incorporate recommendations where viable.

Utilising Modern Methods of Construction (MMC) adds significant environmental benefits in the way the modern components materials are sourced and installed. Using pre-manufactured structural members made of framed or mass engineered timber, cold rolled or hot rolled steel or pre-cast concrete that are not substantially in-situ workface constructed can be manufactured off-site, delivered and installed on-site. This greatly decreases construction time, mitigates wet trades, number of deliveries - thereby reducing pollution, and also unnecessary wastage of materials.



Figure 8 Images Combining Timber and Brick in a Contextual and Contemporary Approach

The outbuilding will incorporate the same palette of external materials as the main property that maintains a continuity and harmonises with the other properties in the vicinity. All components and building materials will be to current standards and regulations. The appearance will reflect the extension's external treatment by using brick-slips and timber panels to clad the proposal. Local grey roof tiles will be installed, which references the neighbouring properties. All windows and doors will be double-glazed and of a casement type.

6.6 Landscape

The landscape design is integral to the proposal. It connects the existing and outbuilding in a holistic approach by introducing softer external garden spaces that contrast against the existing hardstanding areas. Note the following landscape layout has been redesigned to address the comments from the Highways and Drainage Officer for the withdrawn application: P2021/112.

The gardens reinstate acknowledgement to the other properties along Gnoll Park Road and further enhances a physical connection to the local context. The flora and fauna areas assist in dividing the length of the rear garden into zones for communal use. This also distinguishes the rear parking

bays that sit above permeable grasscrete. The rear neglected rectangular plot at the boundary is also rejuvenated. It becomes pedestrian accessible from Hibbert Road. This area will be rejuvenated and used as gardens servicing both the back.

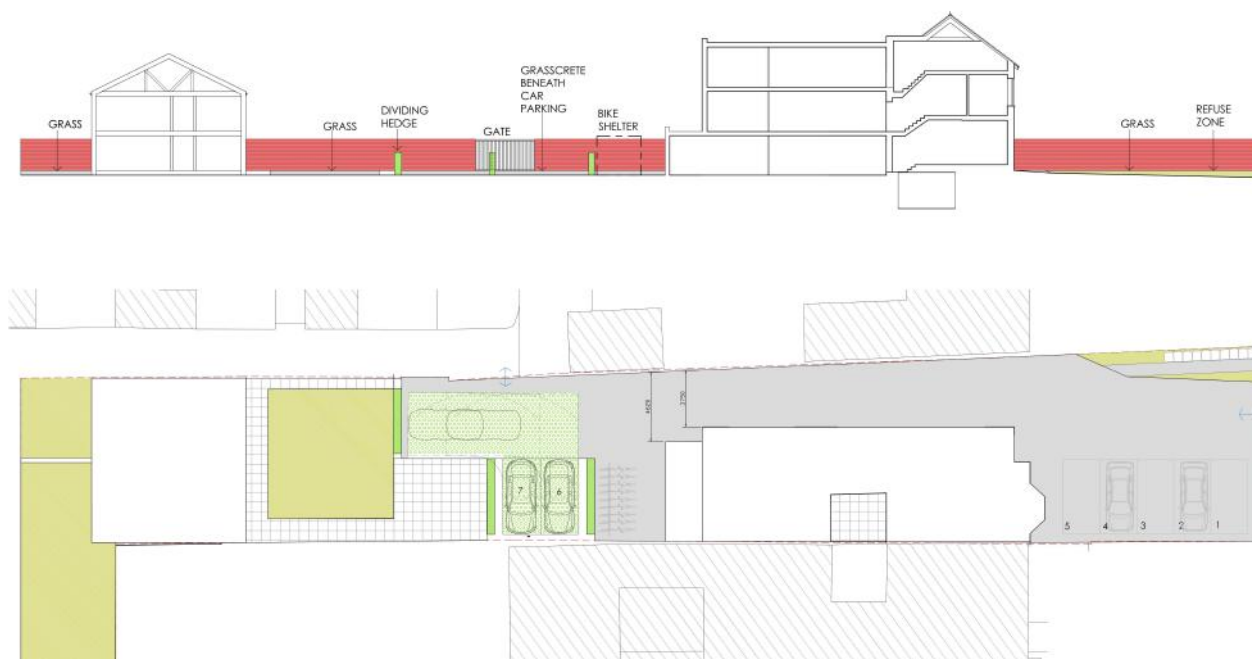


Figure 9 Proposed Landscape Section and Plan

Additionally, by introducing soft green zones between the existing and rear proposals, the rain water can be managed by reducing the area of surface water run-off. This not only helps the aesthetics and encourages biodiversity, but notably helps to reduce surface rainwater run-off within this proposal.

6.7 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 helps 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 these buildings are not lost through demolition.

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 from 13 to 7, see 7.3.3 *Carparking and Cycle Parking Standards*. Therefore, this proposal also reduces vehicle pollution.

6.7.1 Reducing Wastage

NPT, as do other councils throughout Wales and the UK, welcome projects for sustainable design, construction and reduction of carbon emissions that help combat climate change. The proposal encourages a proactive process 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, see 7.3.2 *Policy TR2 Design and Access of New Development*. 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, see 7.5 *Waste Management Strategy*.

6.8 Noise

From reviewing *TAN 11: Noise*, this proposal does not fall into the category of being a noise generating development such as industrial, commercial, civil/roads or aeronautical categories. This proposal stays in keeping with the local context, which is residential in typology, and therefore not a noise sensitive proposal.

Noise level reduction is greatly preventable by having suitable distances between properties. The outbuilding has a comfortable distance of circa 28m - 30m to the existing building, and also has distances of circa 23m and 15m from properties on Park Street and Hibbert Road.

6.8.1 Measures to Reduce Noise Levels

Noise levels are predominantly at their highest when building works being carried-out. However, to mitigate this as much as reasonably possible is to ensure working times are limited in line with national standards and *Building Regulations (SI 1991: 2768)*, *BS 5228: 1984 (parts 1-3)*, *1992 (part 4)*, *Noise control on construction and open sites*.

Vehicle external noise levels have been reduced as the number of car parking spaces has been reduced from 14 to 9 parking provisions.

Additional methods to ensure noise is mitigated is within the construction details. Appropriate insulative materials, both in the external and internal walls, should be specified ensuring the correct decibel (dB) level is met or bettered, and can be found in the following noise related documents: *BS 5821: 1984, Rating the sound insulation in buildings and of building elements*. *BS 8233: 1987, Sound insulation and noise reduction for buildings*.

7.0 Amenities

The following sections discuss the Impact the proposal connects with the surrounding context and environment from the way the application appears and unifies with its environment to the way waste is stored and managed:

7.1 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.

7.2 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 7.5 *Waste Management Strategy*. The existing external hardstanding front garden will continue to be used for parking, see 7.3 *Vehicle Access and Car Parking Standards*. The proposal is considered to contribute positively to the character of the local vicinity.

7.3 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.

Also, as noted in item 3.2.7, above parking standards, this proposal is less than 1,000m² of development and therefore a Travel Plan is not required.

7.3.1 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.

7.3.2 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.

Table 7: Use Class

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:

Table 8 Car Parking Standards

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

7.3.3 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:

Table 9 Cycle Provisions

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

It should be noted, that the application for the neighbouring property, 90, 92 – 5 Gnoll Park Road, P2020/0626, *Change of use from dwellinghouse (Class C3) to residential care home (Class C2) to extend the facilities at No 92-94 by increasing the number of rooms from 34 to 48 including a part two storey part three storey rear extension and a part single storey rear extension which will provide a dining area, additional parking and bicycles bays to the front*, did not meet the required parking standards with a considerable increase of 14 new habitable rooms with only parking and bicycle bays in the front of the property. However, it was granted consent.

As two of the nine units are dedicated towards affordable housing, see 4.4.4 *Affordable Housing*, it is deemed these occupants are not in a financial situation to afford vehicles by limiting factors such as the cost of the vehicle, fuel, insurance and maintenance. These are considered as expenses beyond one's financial viability and therefore not required.

However, bicycle spaces and public transport, such as buses (discussed in 2.6 *Public Transportation*) are readily available several metres outside the proposal. Walking distance to Neath Town Centre and train station is also only 15 minutes.

Hence, the proposed plan will incorporate 7 vehicle parking bays (reduced by 6 from the existing), and the addition of 9 bicycle bays for the residents.

Table 10 Number of Vehicle and Cycle Parking Provisions

Parking Facility	Existing	Proposed
Vehicle Bays	13	
Vehicle Bays		7
Cycle Spaces		9

Vehicle access will continue utilising the current entrance/exit from Gnoll Park Road. Primary pedestrian access will also continue being used from Gnoll Park Road. There are also two secondary pedestrian access routes from Hibbert Road and Park Street. 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.

7.4 Movement and Environmental Sustainability

Essential amenities, services and facilities are located a short walk away, thus encouraging car ownership being less of a necessity. Throughout this application's design, reducing the number of car spaces is important. This is justified by the proposal's extremely good 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.

The nearest train station is also located a short walking Distance away, approximately 0.65km / 0.4 miles North West of the site along High Street which provides frequent services to places such as Swansea, Cardiff, London, Manchester, Bristol, West Midlands, and other major cities. A movement map highlighting the roads as well as the bus, train is provided below.

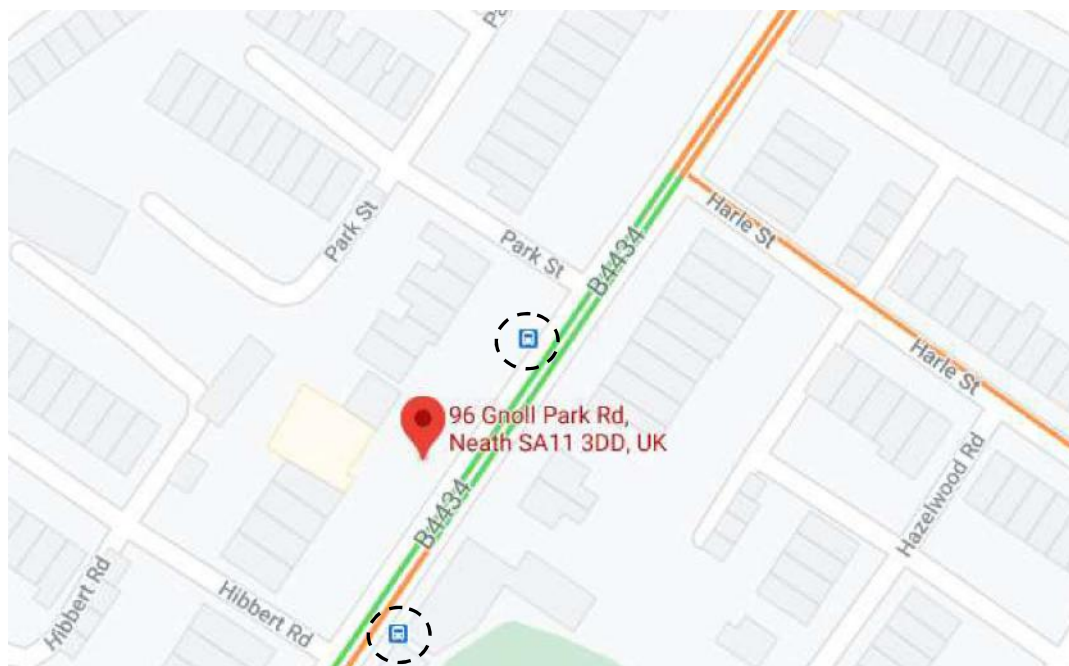


Figure 10 Movement Map Showing Local Bus Stops in Relation to the Proposal

7.5 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. The *Cyfoeth Naturiol Cymru/Natural Resources Wales Flooding* map also shows the plot is outside any flood risk.

Apart from the existing slither of greenery located in the front garden, the rest of the site is surround by existing hardstanding landscape, surface water run-off will continue to utilise the existing surface

water run-off and connect to the mains as have other properties and developments along Gnoll Park Road.

As shown in 6.6 *Landscape*, the introduction of additional garden grass areas between the existing and rear proposals encourages rain water to be managed by reducing the area of surface run-off. This assists in reducing rainwater surface run-off within this proposal by an increase of 64% of surface absorption.

It should be noted that a separate SABs application has been issued that runs concurrently with this application.

Surface Drainage Systems (SuDS)

A SuDs Approval Body (SAB) application was also been submitted, as noted in item 4.4.7.

The carpark area will incorporate grasscrete. This is a widely used pervious reinforced concrete hollow tubes/honeycomb for different types of trafficked areas that can be covered with grass - has grass growing in the voids of the structure or has stones in the voids of the structure. Not only does this solution prevent surface water to accumulate it also gives back to the environment to allow grass and other types of plants to grow between the concrete sections.

This sustainable product is widely used on many rural areas where water management is important but also unifies with the natural surroundings.



Figure 11
Grasscrete used and accepted widely for vehicle parking and as a surface drainage system

The following Table shows the existing and proposed percentage of the increase in soft landscaping/water permeable paving against the hardstanding:

Table 11 Percentage of New Soft Landscaping

	Hardstanding : Soft Landscape (Ratio)	Green Space Percentage
Existing Area	673 : 164	24%
Proposed Area	455 : 295	64%
Net Increase		43%

7.6 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.

Table 12 Waste Management

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.

8.0 Access Statement

This access statement is provided to highlight the intent to incorporate reasonable provisions for disabled people within the design even though most access provisions have been already built at the time of the dwelling's erection.

Where it has not been possible to incorporate provisions, reasons for not doing so will be due to the existing nature and construction of the dwelling. All existing doors will be re-used, and additional doors will be compliant to the appropriate building regulations where possible.

The relevant documents for access and provisions are:

- Approved Document Part M (Latest Edition)
- Approved Document Part K (Latest Edition)
- British Standard BS 8300:2001

8.1 Internal Stairs and Horizontal Access

The stairs from the ground floor to the basement will be in accordance to Part M and K where possible, for ease of use for people with walking difficulties.

Handrails suitable for people with dexterity difficulties will be incorporated into the design, as outlined in BS 8300.

8.2 Internal Doors and Vertical Access

A minimum of 850mm wide corridors and landings has been provided in accordance with Part M, where possible.

The door general decoration will be in accordance with Approved Document recommendations in respect of colour contrast.

9.0 Conclusion

Along with addressing proactive comments made within the preapplication document, this proposal aims to rejuvenate the land, which adheres to the planning policies that assist in forming a new development and assists in an area where it welcomes and encourages and illustrates harmonious contextual design. The proposal also addresses all the comments made by the past and present planning officers. This was an important starting point in the development of the proposal.

Although the area is not in a conservation zone, and through the numerous studies along Groll Park Road, it shows a varied use of how different external materials are applied. However, this proposal acknowledges the sensitivity of the local area and sets-out to incorporate the natural landscape, whilst preserving and integrating the local building aesthetics.

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 proposed dwelling exceeds the minimum space standards whilst preserving the amenity and outlook of the surrounding neighbours. This also encourages using public transportation to the nearby town centre.

Incorporating the natural landscape and ensuring that spatial awareness has been an integral component of the design. This has been pivotal in combining a holistic approach to a design that embraces the heritage and gives back more than is currently the case.

It is therefore considered that the proposals are in accordance with Local and National Core Planning Policies and it is on this basis that consent is being sought from North Port Talbot Planning Authority.

10.0 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 2: Planning and Affordable Housing

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

Bat Roosts Reported in Planning Applications Within the Same Postcode, Acer Ecology, October 2021

Bat and Nesting Bird Survey Report, Surveys conducted May and June 2022, Grounded Trees Ltd

11.0 Appendix I: Flood Maps

The following information is downloaded from the Natural Resources Wales and HM Land Registry maps. Both confirm the proposal site is low risk of flooding.



in association with the



Flood Risk Indicator

Title number and property description

WA869879

96, Gnoll Park Road, Neath, SA11 3DD

Flood risk

The land registered under the above title number does not fall within a river or sea floodplain and is more than 50 metres from the nearest river or sea floodplain.

The land is in an area that has a very low chance of flooding from rivers or the sea which means that it is unlikely to flood except in extreme conditions. 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.

This result was produced on 7 April 2021 based on Environment Agency and Natural Resources Wales flood risk data that was current as of July 2018 and Land Registry data that was current as of 7 April 2021. The Flood Risk Indicator is based on the most up to date Environment Agency and Natural Resources Wales flood data available at the date and time of your search.

Disclaimer

The information contained in this document is for general information purposes only. The flood risk information is provided by the Environment Agency and Natural Resources Wales. You should note that:-

The Flood Risk Indicator shows only the predicted likelihood of flooding of areas of land from rivers or the sea and it is not detailed enough to describe the likelihood of flooding for individual properties.

Individual properties may not always face the same chance of flooding as the areas that surround them because, for example the property may be higher than the surrounding land. There may also be particular occasions when flooding occurs and the observed pattern of flooding does not in reality match the predicted patterns shown on the Environment Agency and Natural Resources Wales flood data.

Because the flood data from the Environment Agency and Natural Resources Wales is created as a result of a modelling process, it may by its nature not be as accurate as might be desired.

If you believe that a particular property does not face the chance of flooding shown on the Environment Agency and Natural Resources Wales flood data, or if you have information that you believe may not have been taken into account, then you should contact your local Environment Agency or Natural Resources Wales office or see the Environment Agency or Natural Resources Wales website for more information on flood data.

We will endeavour to keep the information up to date and correct but make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the flood data. Any reliance you place on such information is therefore strictly at your own risk.

See <https://www.gov.uk/browse/environment-countryside/flooding-extreme-weather>
and <http://www.naturalresourceswales.gov.uk/flooding-and-water>

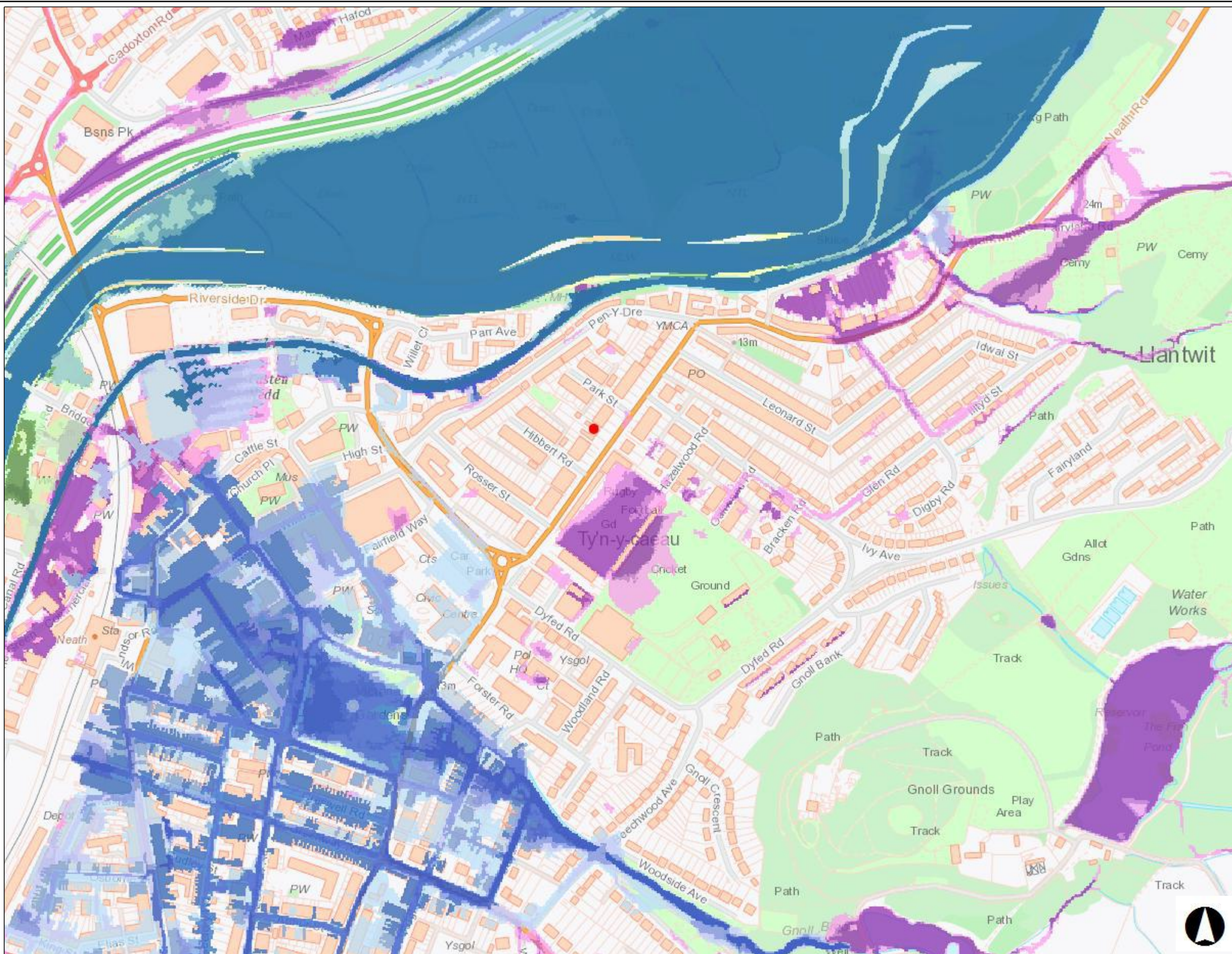
Map Perygl Llifogydd / Flood Risk Map -

Allwedd / Map Key

- Risk Level Under Review
- Flood Risk from Rivers - Extent**
 - High
 - Medium
 - Low
- Flood Risk from the Sea**
 - High
 - Medium
 - Low
- Flood Risk from Surface Water & Small Watercourses - Extent**
 - High
 - Medium
 - Low

Graddfa / Scale at A3 1: 5,000

Dyddiad / Date
13/04/2021



0.3 0 0.13 0.3
British_National_Grid Kilometers

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