



**LRM**  
PLANNING  
LIMITED

# JAMES STREET, PONTARDAWE SUPPORTED LIVING APARTMENTS PLANNING STATEMENT

Prepared by LRM Planning Limited  
on behalf of Grosvenor Hill Social Impact Group

March 2023



## Report Control

**Project:** 9-11 James Street, Pontardawe

**Client:** Grosvenor Hill Social Impact Group

**Job Number:** 22.201

**File Origin:** 22.201/6. Reports

### Document checking

**Primary author:** Emily Elliott

**Initialed:** EE

**Review by:** John-Rhys Davies

**Initialed:** JRD

| Issue | Date       | Status | Checked for issue |
|-------|------------|--------|-------------------|
| 1     | 22/02/2023 | Draft  | JRD               |
| 2     | 15/03/2023 | Draft  | JRD               |
| 3     | 20/03/2023 | Final  | SH                |



## Contents

|                                      |    |
|--------------------------------------|----|
| Report Control .....                 | 1  |
| 1 Introduction .....                 | 3  |
| 2 Site Description and Context ..... | 4  |
| 3 Proposed Development.....          | 6  |
| 4 Planning Policy Framework .....    | 8  |
| 5 Appraisal .....                    | 15 |
| 6 Conclusion.....                    | 19 |



# 1 Introduction

- 1.1 This Planning Statement accompanies a full planning application submitted on behalf of Grosvenor Hill Social Impact Group to change the use of 9-11 James Street, Pontardawe from a residential care home (use class C2) to 5no. supported living apartments (use class C3b).
- 1.2 Grosvenor Hill Social Impact Group is a real estate investment development group specialising in social housing and facilities. Grosvenor Hill Social Impact Group will be responsible for delivering the conversion of the properties. On completion the building will be managed by Accomplish Group who will be the responsible care provider for the self-contained supported living units. Accomplish Group are specialists in supporting individuals with mental health needs to live independently.
- 1.3 This Planning Statement explains the proposals in the context of relevant local and national planning policy and, in these terms, justifies the approval of this planning application.

## The site

- 1.4 The area subject of this planning application is identified on the location plan submitted within this application. It is wholly located within the administrative area of Neath Port Talbot County Borough Council.

## The decision-making framework

- 1.5 As with any planning application, this submission will be determined in accordance with Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004. Both provisions require that this planning application be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 1.6 In the case of Neath Port Talbot County Borough Council, the statutory Development Plan for this site is the Neath Port Talbot County Borough Council Local Development Plan (2011-2026), which was adopted in January 2016.
- 1.7 This application has been designed to meet the expectations of the relevant policies within the adopted Development Plan. Accordingly, in the context of national guidance as set out within Future Wales, Planning Policy Wales, and the accompanying Technical Advice Notes.

## Supporting material

- 1.8 This Planning Statement forms part of a suite of drawings and documents submitted with the application. The Planning Statement demonstrates the suitability of the site to accommodate the proposed development. The full suite of documents and drawings submitted with this application is tabulated in the covering letter.
- 1.9 The following sections discuss the site and its context; the proposed development; planning policy context; followed by an appraisal of the development; and then offering a conclusion in respect of the application submitted herein.



## 2 Site description and context

- 2.1 The site is located in Pontardawe, approximately 300m north west of the town centre. The site occupies a broadly rectangular footprint, measuring approximately 500 square metres and is sited on James Street (Nos. 9-11). It is a parcel of land containing two semi-detached properties that have three storeys (lower ground, ground and first floors), small front gardens, larger rear gardens and one off-street parking space to the side of No.9.
- 2.2 The south-western boundary of the site meets the public highway of James Street, to the north-western boundary is the former Horeb Wesleyaid Chapel Cymraeg, to the north-eastern boundary is the Dragon Arts and Learning Centre and the eastern boundary adjoins the former public house 'Dynevor Arms', which is subject to a recent planning application for the conversion of the premises into 8no. 1-bedroom flats.
- 2.3 In terms of the wider site context, the surrounding area is predominantly residential and commercial in nature, with Pontardawe town centre to the south-east, supporting a mix of shops and eateries. Neighbouring properties have ceased use including the chapel and a public house, but are conventional in appearance.

### Context

- 2.4 In terms of the wider site context, the immediate environs of the site are predominantly residential, comprising a variety of semi-detached and terraced units, which are mainly two storeys in height.

### Flooding

- 2.5 Though the site is in close proximity to the Upper Clydach River, the Welsh Government Development Advice Maps show the site to be within Flood Zone A, which demarks areas at little or no risk of flooding. Under the forthcoming Flood Maps for Planning, which will be published by Welsh Government alongside a new Technical Advice Note 15 over the coming months, the site is shown as being in Zone 1, which again represents areas of least flooding risk.

### Heritage context

- 2.6 In relation to heritage assets, the site is remote from anything of value, with no listed buildings or Scheduled Monuments within close proximity of the site. There are no Conservation Areas in Pontardawe and the nearest listed building is approximately 200m east of the site as the crow flies and therefore does not impact upon the proposed development.

### Movement and access

- 2.7 The site benefits from an existing off-street parking space, adjacent to No.9 and accessed from James Street. The proposal would maintain this existing off-street parking space, as well as retaining the existing pedestrian accesses. There is also an existing designated on-street parking area along James Street, opposite the application site.
- 2.8 The nearest defined retail centre is within 300m south-east of the site, which is Pontardawe



town centre, identified in the local plan under Policy R2/1. It includes a convenience store, bakery, post office and takeaways. Additionally, a Lidl supermarket, a Tesco supermarket, Farmfoods, Pound Stretcher and Home Bargains are located in excess of 500m walking distance south-east of the site.

- 2.9 Within 40m south east of the site are bus stops on James Street, which provide regular services throughout the day to Upper Brynamman (X26). Approximately 100m east of the site are bus stops on High Street (B4603), which provide regular services to Ystradgynlais, Gelli-gron and Swansea (X6 Cymru Clipper). The nearest railway station is at Llansamlet, some six miles from the site, accessible via multiple bus trips, and from where access between Swansea and Cardiff to destinations including Neath, Port Talbot, Bridgend and Pontyclun can be gained.

## Planning history

- 2.10 The site has limited planning history, it does however include the change of use from a pair of semi-detached dwellings to a residential home (ref: P1997/0685 – approved 14<sup>th</sup> August 1997). Along with two applications (refs: P1997/1249 and P1998/0007) for the continuation of works without compliance to particular planning conditions imposed (Nos. 2 and 3). As well as an application referenced P2004/1393 for a “*new conservatory to rear of existing residential care home for adults with a learning disability*” which was approved on 29<sup>th</sup> October 2004.



### 3 Proposed development

#### Housing

- 3.1 The proposal is to undertake the conversion of the existing premises from its former residential care home use (use class C2) to create 5no. self-contained supported living apartments (use class C3b). The proposed units will be social rented units and will be managed by Accomplish Group.

#### Operation

- 3.2 The proposal will provide support workers 24 hours a day, 7 days a week for residents from Neath Port Talbot with mental health conditions. This will ensure that the residents have support whenever they require it. The 5no. proposed units are self-contained promoting independent living, whilst also including communal facilities. It is anticipated that the proposed development would maintain the existing staffing levels of the former use, which would be 4 full-time members of staff, rotating on the basis of there being 2 full-time staff on site at any one time.

#### Design

- 3.3 The proposal does not include any external alterations to the dwellings themselves but seeks to replace one of the external stores to the rear, maintaining the same dimensions, as well as amending the fenestration on the other store.
- 3.4 The proposal will require internal works to accommodate the self-contained units.
- 3.5 The submitted proposed floorplans show the proposed layout which will provide 5no. 1-bed flats and sleeping facilities for members of staff. On the lower ground floor there will be a communal lounge and kitchen where residents and visitors can benefit from a shared space.

#### Vehicular and pedestrian access

- 3.6 The existing vehicular and pedestrian access to the site shall be maintained as existing. The former use consisted of 11 residents and 4 full-time members of staff (any 2 members of staff at any one time), the proposal maintains the same level of staffing but reduces the number of residents to 5. It is considered that the proposal reduces the pressure on existing parking infrastructure, also given that the former and proposed residents do not have access to vehicles.

#### Car parking, bicycle storage and refuse and recycling

- 3.7 The site has existing car parking provision to the side of No.9, accessed from James Street. The residents of the proposed units will not have access to vehicles, subsequently the parking provision will be utilised by members of staff and visitors. There is also designated on-street parking along James Street.
- 3.8 The curtilage of the site will provide adequate bicycle storage facilities for both residents and staff.



- 3.9 The curtilage will provide sufficient space for refuse and recycling facilities.

### Drainage and flood risk

- 3.10 The proposal is for the conversion of an existing building and will seek to use the existing foul and surface water connections, therefore no changes are proposed. Given the former use of the site as a residential care home that consisted of 11 residents, the proposal for 5no. self-contained supported living units would house 5 residents, therefore reducing the number of inhabitants and the pressure on existing drainage infrastructure.



## 4 Planning policy framework

- 4.1 The planning policy context for the determination of this application is provided by national and local planning policy guidance. National guidance is set out within Future Wales, Planning Policy Wales, and the accompanying Technical Advice Notes. Local policy comprises the adopted Neath Port Talbot Council Local Development Plan, and its supporting Supplementary Planning Guidance documents.

### Future Wales: The National Plan 2040

- 4.2 The national development framework for Wales is Future Wales, produced by Welsh Government as a strategy for addressing key national priorities through the planning system over the next two decades. The key priorities include sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

### Planning Policy Wales

- 4.3 Planning Policy Wales (PPW) is the principal national planning policy document which sets out the land use policies of the Welsh Government (WG) against which development proposals should be assessed. The latest version is the eleventh edition, published in February 2021.
- 4.4 The main thrust of PPW is to promote sustainable development. It states at paragraph 1.2 that:
- “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”.*
- 4.5 The purpose of PPW is to set out the key principles for the planning system and establishes what development plans and decisions taken by the planning system must achieve and how development should be shaped to deliver the best possible outcomes. PPW sets out the National Sustainable Placemaking Outcomes, one of which is *“Creating and Sustaining Communities”* by providing *“Homes and jobs to meet society’s needs”*.
- 4.6 Chapter 4 relates to Housing and accordingly, PPW (paragraph 4.2.1) states that new housing developments within both urban and rural areas should include a mixture of market and affordable house types, tenures and sizes to accommodate the housing needs whilst contributing towards the development of sustainable and cohesive communities.
- 4.7 In terms of housing need and supply, paragraph 4.2.12 emphasises that:
- “Planning authorities should also identify where interventions may be required to deliver the housing supply, including specific sites. There must be sufficient sites suitable for the full range of housing types to address the identified needs of communities”.*

### Technical Advice Notes

- 4.8 The following Technical Advice Notes (TANs) are considered to be of relevance in the



consideration of these proposals.

- 4.9 TAN 12 relates to Design and was updated in March 2016. It provides advice and information on a number of related areas including the definition of design for planning purposes; design considerations in planning decisions; and Local Planning Authority design policy and advice.
- 4.10 TAN 18, which was published in March 2007, deals with Transport matters, and advocates locating development where there is good access by public transport, walking and cycling; generally advocating development at sustainable sites.

## Well-being of Future Generations Act

- 4.11 The Well-being of Future Generations Act 2015 imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principles, and to 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. Its content is sought to be delivered through the planning system via the intertwining of the Act through PPW.

## Local Development Plan

- 4.12 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. The development plan for the site comprises the Neath Port Talbot Council Local Development Plan (2011-2026).
- 4.13 The site is within the settlement boundary as defined by the Neath Port Talbot Council Local Development Plan. This site is not subject to any designations. It can therefore be classed as 'white land', whereby the principle of development on this site is acceptable, subject to material planning considerations.
- 4.14 Policies with a prefix of SP (strategic policies) are overarching policies relating to development in the county borough. Strategic Policies for the area provide a basis for the determination of planning applications.
- 4.15 **Policy SP1** (Climate Change) relates to climate change, and states that an emphasis will be on sustainable growth which benefits Neath Port Talbot as a whole. It outlines that this will be achieved by, inter alia:
- *"The efficiency and sustainability of the County Borough's settlements will be enhanced through developing more cohesive and efficient settlements and settlement patterns, and consequently more sustainable travel patterns; and*
  - *Dependence on the private car and the need to travel in general will be reduced through promoting alternative means of transport and more efficient use of existing facilities, co-location and joint use of facilities."*

The site is in a sustainable location insofar as its close proximity to Pontardawe Town Centre and public transportation links. The future residents will not have access to their own vehicles and therefore sustainability will be promoted through walking and the inclusion of secure and



covered bicycle storage to support cycling.

- 4.16 **Policy SP2** (Health) states that the development of sustainable, safe and confident communities requires the co-location of jobs and facilities. The provision of new employment opportunities will also be promoted to reduce unemployment and economic inactivity rates.

The proposed supported living accommodation will ensure that the residents will have a suitable level of 24/7 care to protect their safety and wellbeing, as well as retaining the existing employment provision through 4 full-time equivalent employees.

- 4.17 **Policy SP3** (Sustainable Communities) confirms that the delivery of sustainable, healthy and cohesive communities will be promoted through settlement limits within which development which accords with the settlement hierarchy will be permitted in principle.

The proposed change of use enables a provision of specialist housing to ensure and promote a cohesive community within the settlement limit of Pontardawe, therefore the proposal accords with Policy SP3.

- 4.18 **Policy SP4** (Infrastructure) expects development to make efficient use of existing infrastructure and where necessary, planning obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable.

The proposal utilises the existing drainage and highway infrastructure and does not propose any additions or alterations to either. Given the reduction in occupation that would be arising from the proposed use, the proposal will have less pressure on existing infrastructure and therefore adheres to Policy SP4.

- 4.19 **Policy SP10** (Open Space) ensures that all residents have access to adequate open space through ensuring new development addresses local needs.

The proposal maintains the existing rear outdoor amenity space for the future residents, which will have fewer users than the extant use of the building generates, therefore providing more than adequate access to open space, according with Policy SP10.

- 4.20 **Policy SP11** (Employment Growth) aims to support and safeguard existing employment uses and employment uses will be encouraged in principle within settlement limits.

The proposal retains the same level of employment (4 full-time equivalent employees) as the former use, complying with Policy SP11.

- 4.21 **Policy SP16** (Environmental Protection) seeks to protect air, water and ground quality as well as the environment, including giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable.

The proposed change of use relates to an existing brownfield site, therefore it will protect the existing air, water and ground quality, adhering to Policy SP16.

- 4.22 **Policy SP18** (Renewable and Low Carbon Energy) covers the approach of the Authority to Renewable and Low Carbon Energy, whereby it ensures that development will not have an



unacceptable impact on the environment and the amenity of local residents.

The proposal mainly involves internal alterations and minimal external alterations, which are not visible from public vantage points, which limits opportunities for low and zero carbon technologies. Considering the former and the proposed use, the proposal will not have a detrimental impact upon the amenity of local residents in terms of their privacy, access to natural light and outlook.

- 4.23 **Policy SP19** (Waste Management) includes amongst its aim the need to ensure that new development provides for the sustainable management of waste.

There is sufficient curtilage on-site to provide for sustainable management of waste. The proposed development is not anticipated to generate significant waste given it forms a conversion of an existing building.

- 4.24 **Policy SP20** (Transport Network) requires development proposals to be designed to provide safe and efficient access and promote sustainable transport. Developments also require appropriate parking provision. Policy SP20 links to SP2 in that new development proposals should be accessible by a variety of means, not just private car, in the interest of creating sustainable communities. Walking, cycling and public transport play an important role in reducing the number of shorter journeys taken by car and contribute towards an aim of the LDP, which is to provide a sustainable, more integrated transport network.

The site is in close proximity to Pontardawe town centre, which provides a range of local amenities and facilities. There are safe pedestrian routes to and from the site to promote walking, as well as having bus stops within 40m south east of the site on James Street, which provide regular services throughout the day to Upper Brynamman and approximately 100m east of the site are bus stops on High Street (B4603), which provide regular services to Ystradgynlais, Gelli-gron and Swansea. Secure cycle and car parking is available on site, there is also parking available along James Street.

- 4.25 **Policy SP21** (Built Environment and Historic Heritage) encourages high quality design standards in all development proposals.

The proposal involves few external alterations, namely to the rear stores which are not visible from public vantage points, however the alterations complement the existing size, scale and use of materials within the site.

- 4.26 **Policy AH1** (Affordable Housing) relates to all new housing developments, including conversions, accommodating 3no. or more units will be required to contribute to affordable housing. 10% affordable housing will be sought in Pontardawe. The Policy states that the exact contribution will be dependent on the circumstances of each proposal and the viability of the scheme.

The proposal creates 5no. self-contained supported living units that will provide specialist housing in the form of social rented units for residents of Neath Port Talbot.

- 4.27 **Policy SC1** (Settlement Limits) relates to settlement limits and states that development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.



The Settlement Hierarchy at Table 3.1 of the LDP has identified communities that have sufficient capacity to accommodate new development within designated boundaries. Pontardawe is one of three settlements that lie at the top of the hierarchy as it is a regionally important settlement providing the widest and most diverse range of functions. The proposed change of use would provide a much-needed specialist housing function within Pontardawe.

- 4.28 **Policy I1** (Infrastructure) builds upon SP4, relating as it does to Infrastructure Requirements. It states that provision for various resources and amenities must be considered. This includes affordable housing.

The proposed change of use will utilise the existing infrastructure in terms of parking and drainage, given the reduction in the number of residents, it is considered that the proposal will have less pressure on existing infrastructure.

- 4.29 **Policy OS1** (Open Space Provision) requires that provision is made for open space where a local deficit is identified.

The Open Space Supplementary Planning Guidance (SPG) (2017) provides additional context for this Policy. It states:

*"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."*

The proposal is a change of use from a residential care home to 5no. self-contained supported living units. The figures contained within Table C.0.1 of the SPG is based upon the Open Space Assessment (2016) which indicates that Pontardawe has a deficit of non-pitch sport, informal open space, children's play and allotments. The SPG states that contributions will be sought where a shortfall in open space provision has been identified, it is unclear whether there has been an updated Open Space Assessment. The Planning Obligations SPG at paragraph 5.6.12 states that exceptions for contributions towards children's play provision include one-bedroom units.

- 4.30 **Policy EN8** (Pollution and Land Stability) relates to Pollution and Land Stability and requires that new proposals must adequately consider, and address where necessary, any impacts arising from pollution resulting from new development.

The proposed development will not have any unacceptable adverse effect on health, biodiversity, local amenity or would expose people to unacceptable risk due to air, noise, light or water pollution, contamination, or land instability. Therefore, the proposal accords with Policy EN8.

- 4.31 **Policy W3** (Waste Management in New Development), seeks to ensure that provision is made for design, layout, storage and management of the waste in new developments, both during construction phase and occupation.



The proposal does not involve any construction except for the replacement of an existing store. The site benefits from a large curtilage that can accommodate the storage of waste from occupiers.

- 4.32 **Policy TR2** (Design and Access of New Development), legislates how access must be accounted for in new development. This includes ensuring that new development does not compromise safety, effectiveness and efficiency of the highway network; that cycle and car parking provision is delivered at an appropriate level; and that sustainable travel options are provided where possible.

The proposal will retain the existing off-street parking space and is likely to result in lower trip generation than the extant lawful use. Whilst the last use of the building included 11 residents and the proposed provides for 5 residents, the level of visitors should be decreased given that there will be fewer occupants. The proposal will also provide a secure and covered bicycle store to promote sustainable travel. The proposal accords with Policy TR2.

- 4.33 **Policy BE1** (Design), emphasises the importance that a new development achieves and creates attractive and safe places. It sets out a series of criteria that are sought to be achieved on new development proposals. This includes considerations of character, context, materials, highway safety, local features, security, transport connectivity, use of resources, drainage and layout.

The minimal external alterations, namely to the two stores in the rear curtilage will maintain the existing character and use similar materials to respond to the existing properties.

- 4.34 A summary of the pertinent LDP policies is provided below, listed in the order they appear in the LDP.

| Policy                    | Relating to                     |
|---------------------------|---------------------------------|
| <b>Strategic Policies</b> |                                 |
| SP1                       | Climate Change                  |
| SP2                       | Health                          |
| SP3                       | Sustainable Communities         |
| SP4                       | Infrastructure                  |
| SP10                      | Open Space                      |
| SP11                      | Employment Growth               |
| SP16                      | Environmental Protection        |
| SP18                      | Renewable and Low Carbon Energy |
| SP19                      | Waste Management                |
| SP20                      | Transport Network               |



SP21 Built Environment and Historic Heritage

**Topic Based Policies**

SC1 Settlement Limits

I1 Infrastructure Requirements

AH1 Affordable Housing

OS1 Open Space Provision

EN8 Pollution and Land Stability

W3 Waste Management in New Development

TR2 Design and Access of New Development

BE1 Design

## Supplementary Planning Guidance (SPG)

4.35 In addition to the above policies, the following SPGs are also considered to be relevant to this application:

- Open Space and Greenspace (July 2017);
- Planning Obligations (October 2016);
- Design (July 2017); and
- Car Parking Standards (October 2016).

4.36 The SPGs are considered in detail within the appraisal section of this Planning Statement.



## 5 Appraisal

### Overview

- 5.1 This section of the Planning Statement aims to identify the main issues relevant to the determination of the application and assesses the scheme against these.
- The **principle** of the development of this site in land use policy terms.
  - The **residential amenity** impact of the proposed development.
  - The **design** of the proposed development.
  - The **accessibility, parking and waste** impact of the proposed development.
  - The **drainage** impact of the proposed development.
  - The **planning obligations** relating to the proposed development.

### Principle of the development

- 5.2 The application site is situated within the established settlement boundary for Pontardawe as defined under Policy SC 1 of the Neath Port Talbot LDP. There are no identified constraints or policy conflicts which would have a bearing on the principle. The site lies in a sustainable location as it is in close proximity to Pontardawe town centre, therefore in short walking distance to good public transportation links and local amenities. PPW and Future Wales promote the efficient reuse of previously developed land in the most sustainable locations.
- 5.3 The principle of residential development is established by virtue of its location within a predominantly residential area; the lack of site-specific allocation or designation within the LDP; and the highly sustainable location of the site well within the settlement boundary.
- 5.4 The site benefits from a care related use and the proposal is for supported living, providing a care use that supports independent living for residents. Each resident is provided with a person-centred support plan to ensure that the right level of care is provided at all times.
- 5.5 The overriding principles of PPW are considered to be met, which advocates siting new development within existing urban areas. In this respect, a brownfield site is being made use of in order to provide much-needed specialist housing in a sustainable location. The proposed units will be social rented units and will be managed by Accomplish Group. The development therefore enables individuals to live independently and safely in their own homes for longer. The proposal accords with PPW and LDP Policies SP1, SP2, SP3, SP11 and SC1.

### Residential amenity

- 5.6 The properties will provide a good level of amenity for future residents, as the proposal will provide self-contained single occupancy units which will have a pleasant and healthy environment in terms of internal floor space, outlook and natural light. All habitable rooms are served by sufficient window openings to allow sufficient outlook and light to provide a good



standard of internal amenity. Each resident would have their own self-contained unit which would include a lounge, kitchen area, a bedroom and a bathroom. On the lower ground floor there would be a communal lounge and kitchen for the residents too. On the first floor there is a staff sleep-in area that includes a separate bathroom and a separate office space to be provided within a store to the rear of the buildings.

- 5.7 The site has a large rear outdoor amenity space that can be shared and enjoyed by the future residents.
- 5.8 Given the former use as a residential care home, when compared to the proposed use as 5no. self-contained supporting living units, it would not result in any detrimental impact on adjacent neighbours in terms of their outlook, privacy or access to natural light.

## Design

- 5.9 Proposed external alterations are minimal, solely relating to the two detached stores to the rear curtilage of the site. The siting, scale and design of the external alterations are not visible from any public vantage point. The proposed use and alterations will not change pedestrian or vehicular access to the site. The proposal therefore accords with PPW, the Design SPG and LDP Policies TR2 and BE1.

## Accessibility, parking and waste

- 5.10 Access to the existing parking provision is from James Street which is a 30mph speed limit road. The proposal will retain the existing parking provision, which is suitable for 1 vehicle. The applicant has confirmed that the residents of the 5no. self-contained units would not have access to their own vehicles, but instead the parking provision would be utilised by staff. The pedestrian access to the site will not be altered.
- 5.11 Given the former use of the site as a residential care home that included more residents, namely 11, the proposal for 5no. self-contained supported living units would house 5 residents, therefore reducing the number of inhabitants. The level of staff would remain the same as the former use, as well as the previous use having visitors so would the proposal. Therefore, the proposed use for supporting living self-contained units would reduce the number of vehicle movements and parking demand. It is also worth noting that the site is within close proximity to Pontardawe town centre and that there are public transport routes within 40 metres of the site which provides sustainable access to local amenities and facilities.
- 5.12 The proposal also includes bicycle storage provision for residents and staff to promote sustainable travel.
- 5.13 Having regard to the Council's Car Parking Standards SPG, the former and proposed use do not fall within the stated categories under 'Residential'. The site is located within Zone 2 of the Car Parking Standards SPG, wherein for general purpose apartments 1 space per bedroom would be required. However, as the proposal is seeking a specialist type of accommodation, where residents do not drive, it is unreasonable to consider such and the notes within the SPG indicate such, "*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*". Therefore,



the proposed car and cycle parking arrangements adheres with PPW, the Council's Car Park Standards SPG and LDP Policy SP20.

- 5.14 The site has a large curtilage to accommodate the storage of recycling and waste reciprocals.
- 5.15 The proposal accords with PPW and LDP Policies SP1, SP4, SP19, SP20, I1 and W3.

## Drainage

- 5.16 The proposed development constitutes a change of use to the existing building and benefits from existing drainage connections for foul and surface water. No construction of additional hard standing areas are proposed.
- 5.17 In drainage terms the proposal represents no material increase to the existing situation, as the proposal will result in fewer residents which could lead to a decrease to the existing situation. The proposed development is considered to be supported by appropriate infrastructure in accordance with Policies SP4, I4 and BE1.

## Planning obligations

- 5.18 This sub-section provides an overview of the Planning Obligations SPG in relation to the proposed development.
- 5.19 In terms of affordable housing, Policy AH1 requires all new housing developments, including change of use, that result in 3 or more units to contribute towards affordable housing. The requirement for Pontardawe is a 10% contribution. The Planning Obligations SPG states that the Council has a preference for the affordable units to be provided on-site, however, where contributions do not equate to a full unit, commuted sums should be used, or off-site contributions sought. Given that the proposal will create 5no. social rented units, it is considered that there will be no requirement for commuted sums.
- 5.20 With regards highways infrastructure, all proposals, irrespective of their scale, are subject to planning obligations relating to such where necessary. When considering the former and proposed use, the proposal would reduce the pressure on the existing highway network and infrastructure, whilst providing a much-needed form of specialist housing, therefore it would not seem necessary to require planning obligations for such, given the proposed use and sustainable transport measures proposed. Neither sustainable transport contributions nor travel plans are required for the scale of development proposed.
- 5.21 Whilst residential development can lead to a strain on existing educational infrastructure, the SPG recognises that not all residential development will impact such, in particular one-bedroom units do not provide accommodation for school age children and therefore the requirement for a contribution is discounted. Given the proposal is for one-bedroom units, there is not a requirement for educational contributions.
- 5.22 Furthermore, Welsh language contributions are only required in relation to major development proposals, as the proposal does not reach the required threshold of 10 units or more such contributions are not required.



- 5.23 In terms of open space, there is a separate SPG on the topic. Table C.0.1 within the Open Space SPG indicates that Pontardawe has a deficit of non-pitch sport, informal open space, children's play and allotments. It is unclear whether there has been an updated Open Space Assessment since 2016. The Open Space SPG states that contributions will be sought where a shortfall in open space provision has been identified from development proposals for 3 or more residential units. The Planning Obligations SPG at paragraph 5.6.12 states that exceptions for contributions towards children's play provision include one-bedroom units. Financial contributions are sought for all categories of open space identified within Policy OS 1. However, the SPG states that financial contributions will not be sought to meet an existing and identified shortfall in open space provision and that an assessment will be made of the potential impact of the proposed development across the range of open space categories.
- 5.24 Biodiversity and the natural environment contributions are required for any proposal that will impact upon locally, nationally or internationally important designated sites, ecosystems, habitats and species populations regardless of the type or scale of the proposal. The proposal utilises existing buildings within the settlement limit, from studying Neath Port Talbot's Local Development Plan and Natural Resources Wales mapping, it is apparent that the site does not fall within any such designated sites. Whilst the site is adjacent to the Upper Clydach River valley which falls within Mynydd Y Garth Special Landscape Area, the proposal is for a change of use that would not have any adverse impact upon the features and characteristics of such.
- 5.25 Planning obligations for community facilities are only sought on residential development of 10 units or more, therefore the proposal does not meet the required threshold. Additionally, historic environment contributions are only sought in relation to proposals that impact upon important features of the historic environment. As previously discussed, the site is remote from anything of historic value, with no Listed Buildings, Scheduled Monuments or Conservation Areas nearby. Where proposals increase pedestrian footfall, planning contributions may be sought for public realm and landscaping improvements, however the proposal would result in fewer residents than the former use and therefore planning contributions would not be required in this instance.



## 6 Conclusion

- 6.1 This Planning Statement is produced in support of proposals for the change of use of 9-11 James Street from an existing residential care home use to 5no. self-contained supported living units that supports individuals with mental health needs to live independently.
- 6.2 The principle of the development is established through the location of the site in the settlement boundary of Pontardawe, and its sustainable location. There are no policy constraints requiring the retention of the existing use, nor preventing support for the proposed use.
- 6.3 The proposal will deliver specialist supported care accommodation that meets specific identified local housing need, particularly for those residents who would otherwise find it difficult to find a fully supported permanent homes, with care and support provided as required.
- 6.4 The proposal will deliver both economic and social benefits: including a specialist form of supported living that identifies local needs, delivers local economic investment and jobs, and utilises a brownfield site.
- 6.5 Wellbeing goals of the Well-being of Future Generations Act are considered to be adhered to through this application in that there would be no significant or unacceptable impacts upon the achievement of wellbeing objectives as a result of the application being approved and development being carried out. The PPW brings the objectives of the Act into focus in a planning context, and through the planning policy analysis undertaken in this Statement, that compliance with PPW is demonstrated.
- 6.6 In conclusion, the proposal provides much needed supporting living accommodation for those with mental health and learning disabilities, with no detrimental impacts on the immediate environs, and no material planning considerations dictating that the application cannot be supported. On this basis, it is respectfully recommended that Neath Port Talbot Council put this application forward for approval.

***LRM Planning***  
***March 2023***