

BRYNMORGAN VILLA, UPPER CWMTWRCH, SA9 2XG

**ERECTION OF SELF-CONTAINED UNITS FOR ADDITIONAL
ACCOMMODATION AND EDUCATION UNITS WITHIN THE
GROUNDS OF THE EXISTING CARE FACILITY**

PLANNING STATEMENT

APRIL 2023



Geraint John Planning

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1.0 INTRODUCTION

- 1.0 This Planning Statement has been prepared in support of an application for Planning Permission, submitted on behalf of Springboard Education and Care Ltd, in relation to the following development proposal at Brynmorgan Villa, Upper Cwmtwrch:

"ERECTION OF SELF-CONTAINED UNITS FOR ADDITIONAL ACCOMMODATION AND EDUCATION UNITS WITHIN THE GROUNDS OF THE EXISTING CARE FACILITY"

Purpose and Structure of this Statement

- 1.1 This Planning Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development. The statement is structured as follows:

- **Section 2** provides a description of the characteristics of the site and surroundings;
- **Section 3** provides details of the development proposals;
- **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
- **Section 5** provides an overview of the pre application response;
- **Section 6** analyses the design and key planning considerations arising from the proposed development (in light of the planning policy context); and
- **Section 7** lays out a conclusion and summary of the proposed development.

Documents submitted in support of the Application

- 1.2 The following documents are submitted in support of the application, and should be read alongside this Planning Statement:

- Planning Application Form;
- Planning Statement;
- Plans and Drawings (Prepared by Office for Urban and Rural Design - OURD):
 - Development Plan (dwg 2303-A-099);
 - GA Plan (dwg 2303-A-100);
 - Location Plan (dwg 2303-A-002);
 - Site Overview (dwg 2303-A-010);
 - Principle Elevations (dwg 2303-A-201);
 - Accommodation Building Elevations (dwg 2303-A-202);
 - Education Building Elevations (dwg 2303-A-203);
 - Sections (dwg 2303-A-300); and
 - Principle Elevations Perspective (dwg 2303-A-400).
- Topographical Survey (Prepared by JR Land Surveys);
- Letter of Support (Prepared by Springboard Education and Care);
- Coal Mining Risk Assessment (Prepared by Rhondda Geotechnical Services); and
- Flood Consequence Assessment & Hazard Rating (Prepared by HydroGeo).

2.0 SITE AND SURROUNDINGS

Site Location

- 2.1 The site is situated within the county borough of Neath Port Talbot, upper Cwmtrwch. Brynmorgan Villa is set in approximately 1.4 acres of landscaped grounds. The site comprises a primary structure in the form of a residential care home centred centrally within the plot. Surrounding the care home is various vacant built form including a swimming pool area and various outbuildings.



Approximate Red Line Boundary of the Site

- 2.2 The site comprises a sloping topography from west to east. It is enclosed by a dense tree line / foliage on all of its boundaries that provide a form of natural screening. The point of access and egress is situated on the eastern boundary of which adjoins the A4068. The principal elevation of the care home is adjoined by a large, tarmacked area that provides 10 parking spaces for employees and visitors. The below rudimentary block plan provides a visual representation of the site.



Outline of existing structures at site

Key	Existing Structure
	Existing Care Home
	Vacant Swimming pool
	Vacant Outbuildings

Existing Care Home



- 2.3 The above extract depicts the established care facility that is located centrally within the plot. The built form comprises a single storey and is surrounded by a substantial area of existing hardstanding / tarmac, of which is used to provide parking at the site.

Vacant Swimming Pool



- 2.4 The swimming pool is situated behind / west of the principal care home. The pool itself is not in use and has more recently been filled on health and safety grounds so that the complex is secure for occupiers. At present, this area comprises a large rectangular concrete slab which is used as a sports pitch area by the current children.

Vacant Outbuildings



- 2.5 Outbuildings are located on the northern periphery of the site, either side of the existing care facility. They are currently in a poor state of repair, comprising fabricated steel cladding and concrete blocks, and as such, are not used.

Access

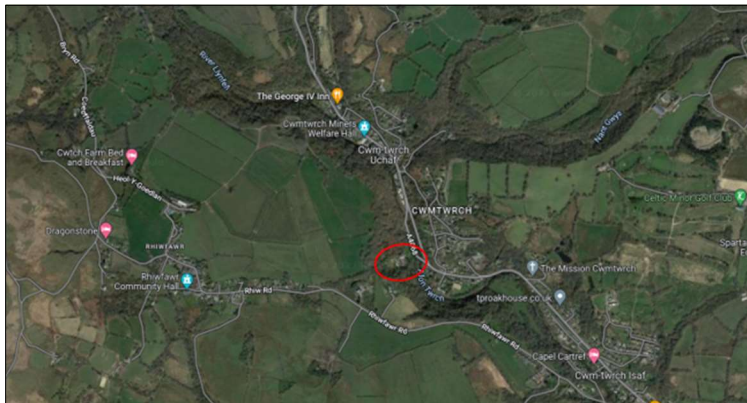
- 2.6 The site benefits from existing access as shown below. The tarmacked drive way adjoins the A4068 and provides efficient entry and egress to and from the site. The access point is approximately 8.5 metres wide and is considered to produce effective visibility splays.



View of the site and vehicular access from A4068

Wider Surrounding Area

- 2.7 An aerial view of the site within the setting of the wider surrounds is shown below for reference:



Brynmorgan Villa in context of wider surrounds

- 2.8 The site is situated within the village of Cwmtwrch within the valley of the Afon Twrch. The village consists primarily of pockets of residential dwellings in between areas of green fields / dense tree foliage. Although separated by the Afon Twrch River, the village is accessible by foot due to its proximity to the site.
- 2.9 The village comprises Cwmtwrch Miners Welfare Hall, Pentre Tygwyn Service Station, The George Inn Pub, the New Tredegar Arms and Cwmtwrch RFC. The site is also located 1 mile away from Ystalyfera and Ystradgynlais of which comprises further amenities and services. The site is therefore considered to be in close proximity to a number of demanded land uses.

Sustainability and Connectivity

- 2.10 The site is within proximity to the A4068 and A4067, and as such has efficient and accessible links to the centre of Cwmtwrch, Ystradowen and further afield to the main settlements of Glan Rhyd. The nearest bus stop is approximately 180 metres from the site (Heol Gleien Stop), with frequent services – service no.'s 64, 167 and 905 (up to every 15 minutes) providing routes to surrounding areas including; Cwmtwrch Isaf, Ystradgynlais, and Crynant. The site is circa 15 miles from Swansea of which is accessible via the adjoining A4067 road.

Planning History

- 2.11 An online search of the Neath Port Talbot Council's planning register shows the site has a modest planning history, as set out in the table below:

Reference No.	Address	Proposal	Decision	Date
P2021/0095	BRYNMORGAN VILLA LOWER BRYNMORGAN BRIDGE UPPER CWMTWRCH SA9 2XG	CHANGE OF USE OF DWELLING TO RESIDENTIAL CARE HOME FOR YOUNG PEOPLE MAX 4 RESIDENTS (C3 TO C2) AND ASSOCIATED WORKS	APPROVED	09/03/2021
P2010/0183	BRYNMORGAN VILLA UPPER CWMTWRCH SWANSEA SA9 2XG	RETENTION OF USE OF FORMER BED AND BREAKFAST AS A DWELLING HOUSE	APPROVED	06/04/2010
P2005/0653	BRYNMORGAN VILLA UPPER CWMTWRCH SWANSEA SA9 2XG	CHANGE OF USE FROM RESIDENTIAL HOME TO BED AND BREAKFAST	APPROVED	20/06/2005
L1982/0272	BRYNMORGAN VILLA UPPER CWMTWRCH LLIW VALLEY SA9 2XX	CHANGE OF USE OF PART OF EXISTING BUNGALOW TO RESIDENTIAL ACCOMMODATION FOR THE ELDERLY	APPROVED	28/09/1982

Planning history table for the site

- 2.12 As shown in the above table, the property was previously used for residential accommodation for the elderly for circa 23 years up until 2005 when the property was converted to a bed and breakfast.
- 2.13 The property was converted to a single-family dwelling house in 2010 albeit, the composition and layout of the property had not been significantly altered and therefore presented a good opportunity to be converted back to the use of a care home without the need for any external works in order to facilitate occupiers.
- 2.14 In March 2021, the use of the site changed from a dwelling to a residential care home for young people (C3 to C2). The Decision Notice for the approved application states: *'The proposal represents an appropriate form of development that would have no unacceptable impact on the character of the area, residential amenity, or highway and pedestrian safety. Accordingly, the proposed development is in accordance with Policies BE1, TR2 of the Neath Port Talbot Local Development Plan'.*
- 2.15 The site has successfully in operation for over 14 months, with all rooms within the care home now fully occupied (4 residents in total as per the permission).

3.0 DEVELOPMENT PROPOSALS

3.1 The application seeks the approval of Full Planning Permission for the:

"ERECTION OF SELF-CONTAINED UNITS FOR ADDITIONAL ACCOMMODATION AND EDUCATION UNITS WITHIN THE GROUNDS OF THE EXISTING CARE FACILITY"

3.2 The proposed development comprises the erection of two self-contained modular units. The units are to be used incidental with the existing facility to provide additional residential accommodation and educational facilities given an increase in demand for occupant places.

3.3 An overview of the proposed development sited within the exiting care facility is shown below:



Proposed Development Plan (dwg. 2303-A-099)

3.4 As shown above, the proposal comprises the erection of an accommodation unit (Building 1) and an educational unit (Building 2).

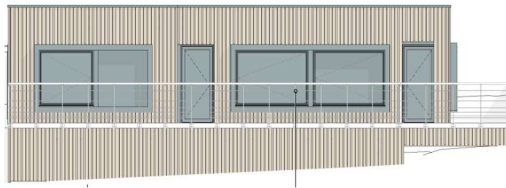
3.5 The current and proposed rota arrangements, resident numbers and staff numbers are shown in the below table:

	Children	Staff & Rota
Current	4	08:00 - 22:00 4 staff at 1:1 ratio 22:00 - 08:00 1 staff awake, 1 staff sleep in
Proposed	6	08:00 - 22:00 6 staff at 1:1 ratio 22:00 - 08:00 1 staff awake, 1 staff sleep in
Intensification	2	2 additional day staff

3.6 The proposed elevational, floor, roof and landscaping plans have been extracted and shown below for ease of review.

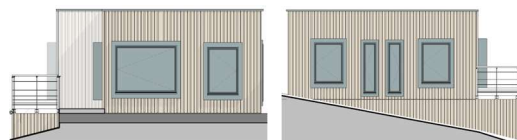
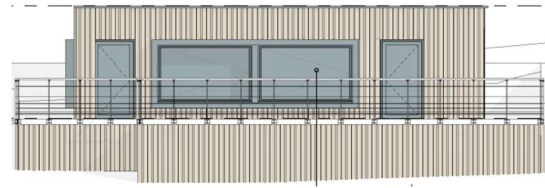
Elevational Plans

Accommodation Unit (dwg. 2303-A-202)



Front Elevations

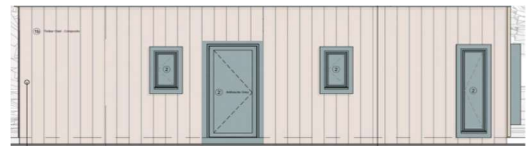
Education Unit (dwg. 2303-A-203)



Side Elevations



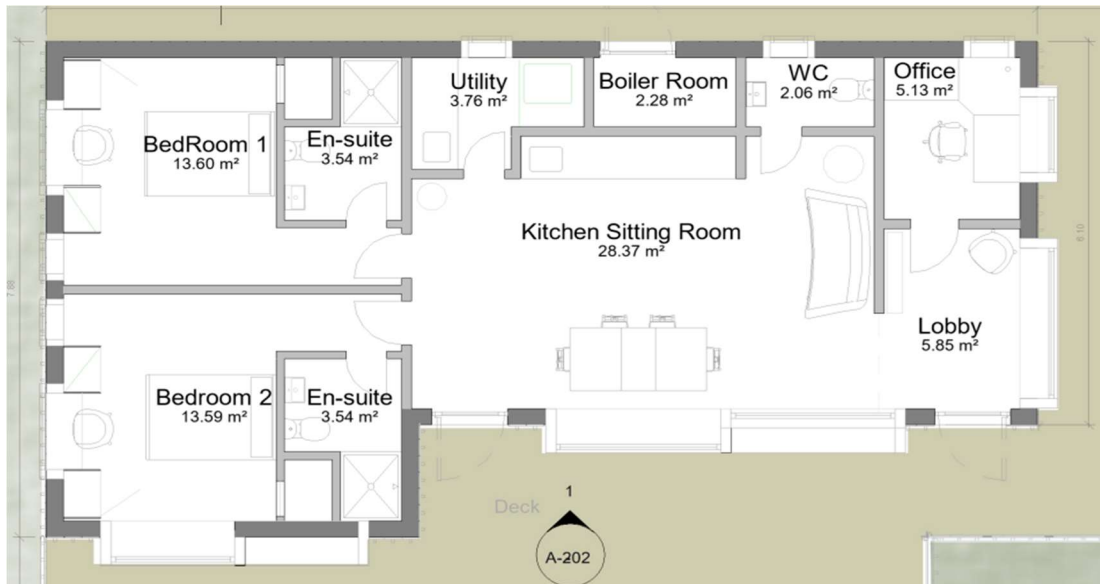
Rear Elevations



- 3.7 The principal elevations of both units (front and most side elevations), as well as the subterranean under-build, comprise natural timber cladding that is considered rustic, proposed purposefully to be sympathetic to the existing setting in terms of the predominantly natural surrounds and have a positive visual impact accordingly.
- 3.8 The rear elevations and the side elevation of the education unit is proposed to comprise a plainer façade, made up of composite timber panels / planks. These elevations are entirely screened with surrounding built form and therefore the visual impact from these elevations is negligible.
- 3.9 The proposed materials schedule for the two units is outlined below for reference:
- Exterior: *Timber Cladding (2 types as shown above;)*
 - Windows & Doors: *Anthracite Grey;*
 - Roof Coping: *Anthracite Grey;*
 - Deck: *Composite Decking Board;*
 - Balustrade: *Wire with Chrome Handrail; and*
 - Roof: *Sedum.*

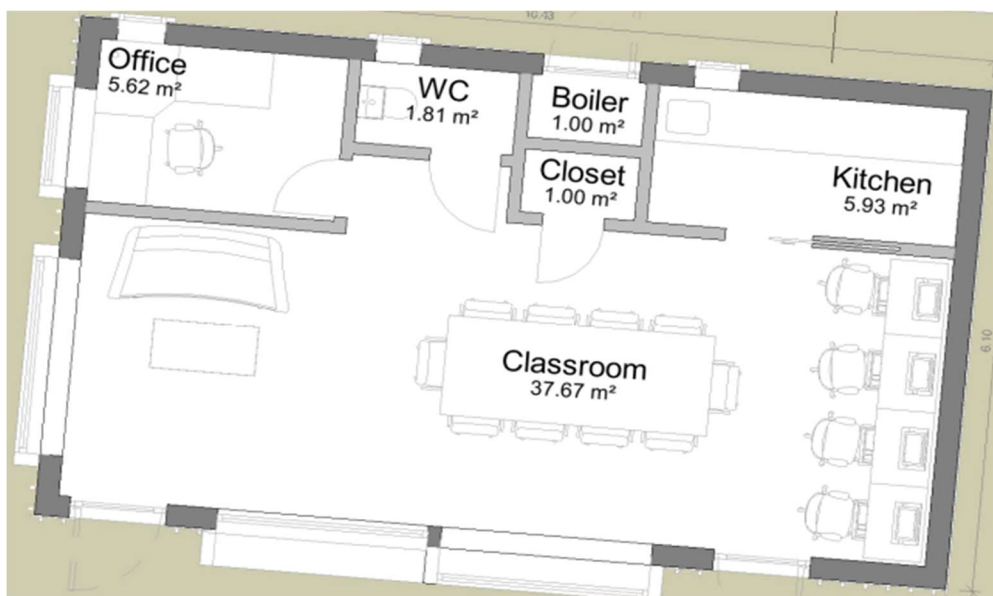
Floor Plans

- 3.10 The proposed floor plans for the accommodation unit and education unit are extracted and provided below for reference.
- 3.11 As shown below, the internal configuration of the proposed accommodation unit comprises two ensuite bedrooms, a kitchen with ancillary rooms, and an office for monitoring / supervising purposes.



Proposed Accommodation Floor Plan (dwg. 2303-A-100)

- 3.12 The proposed education unit is smaller in footprint, comprising an internal configuration of a classroom, kitchen and office.



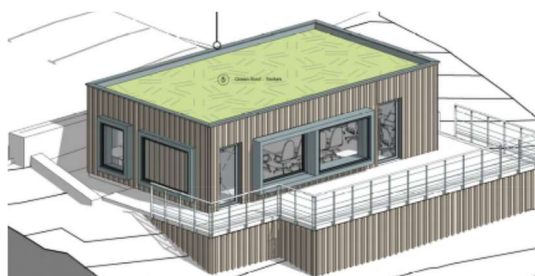
Proposed Education Floor Plan (dwg. 2303-A-100)

Roof Plans

- 3.13 For the benefit of sustainability / biodiversity enhancement purposes, as well as further responding positively to the natural surrounds, both units are to comprise sedums roofs, as shown below:



Accommodation Unit (dwg. 2303-A-202)



Education Unit (dwg. 2303-A-203)

Landscaping Plans

- 3.14 The erection of the unit 1 (accommodation) will omit existing trees in front of the proposed development area, for the purpose of safe construction and use of the accommodation unit. The trees proposed to be removed are shown below for reference.



Trees to be removed



- 3.15 There is a total of 10 medium – small low quality coniferous trees (specifically Pinus Sylvestris). For the purpose of mitigating the impact of this tree removal, as well as providing additional screening, the proposal is to replace the omitted trees with the following landscaping schedule / tree plan:

Type	Count
Lombardy Poplar	8
Apple Tree (Cornish Gilliflower)	3
Hedgerow (Griselinia Littoralis)	60

Proposed Landscaping Schedule

- 3.16 As per the above landscaping schedule, the proposal is to introduce a greater quantity and quality of trees to the site than what currently exists.

4.0 PLANNING POLICY CONTEXT

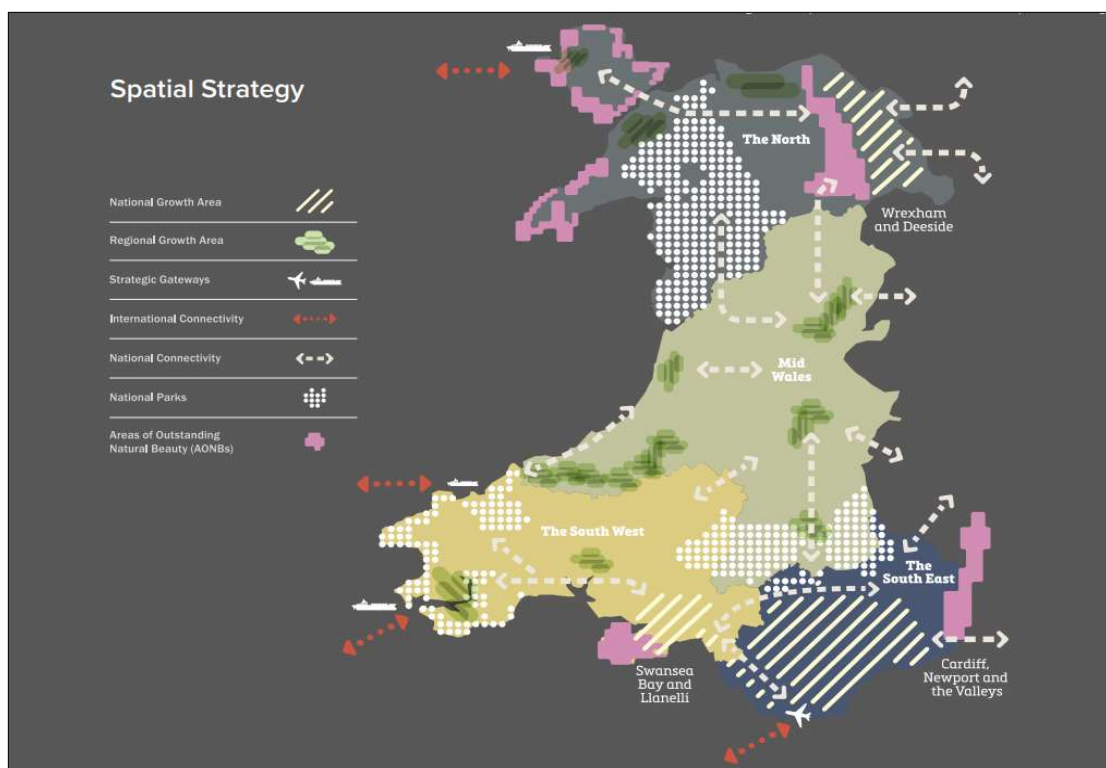
- 4.1 A review of the planning policy context associated with the site and proposed development (at the national and local level) is provided within this section of the Statement.

National Planning Policy

- 4.2 The following policy / guidance documents prepared at the national (Welsh Government) level are of relevance to the determination of the application.

Future Wales: The National Plan 2040

- 4.3 Future Wales: The National Plan 2040 was adopted in February 2021 and replaces the Wales Spatial Plan as the national development framework setting the direction for development in Wales up to 2040. An extract of the Wales spatial strategy, identifying NPT as a Regional Growth Area is extracted below for reference.



Future Wales Spatial Strategy

- 4.4 Whilst Future Wales encourages development in cities and large towns to grow urban areas, the plan also states that *"in all parts of Wales the strategy supports sustainable growth"*. This is evidenced within the following Future Wales Policies:

- **Policy 1 – Where Wales Will Grow**

- *"Development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need";* and
- *"Development in towns and villages in rural areas will support local aspirations and need, complementing rather than competing with efforts to grow our cities and towns".*

- **Policy 4 – Supporting Rural Communities**

- *"Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges".*

- **Policy 5 – Supporting the Rural Economy**

- *"Strategic and Local Development Plans must plan positively to meet the employment needs of rural areas including employment arising from the foundational economy; the agricultural and forestry sector, including proposals for diversification; start-ups and micro businesses. The Welsh Government also strongly supports development of innovative and emerging technology businesses and sectors to help rural areas unlock their full potential, broadening the economic base, and creating higher paid jobs."*

Planning Policy Wales: Edition 11 (February 2021)

- 4.5 Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

Placemaking

- 4.6 Paragraph 2.8 sets out the key drivers for placemaking, and states:

"Planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. These goals are extracted below:



The Well-being of Future Generation's Goals

National Sustainable Placemaking Outcomes

- 4.7 Figure 6 on page 20 outlines how PPW should be used to achieve sustainable places in diagram format:



PPW Figure 6

- 4.8 Paragraph 2.27 sets out how to assess the benefits of sustainable development:

"Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle".

- 4.9 The key factors in the assessment process include:

Social Considerations

- *Who are the interested and affected people and communities;*
- *How does the proposal change a persons way of life, which can include:*
 - *how people live, for example how they get around and access services;*
 - *how people work, for example access to adequate employment;*
 - *how people socialise, for example access to recreation activities; and*
 - *how people interact with one another on a daily basis*
- *Who will benefit and suffer any impacts from the proposal;*
- *What are the short and long-term consequences of the proposal on a community, including its composition, cohesion, character, how it functions and its sense of place; and*
- *How does the proposal support development of more equal and more cohesive communities.*

Economic Considerations

- *Whether, and how far, the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing local employment opportunities or upgrading the environment;*

- *The contribution the development would make to achieving wider strategies, for example the growth or regeneration of certain areas;*
- *The contribution this economic activity will have to wider policy goals; and*
- *How the proposal would support the achievement of a more prosperous, low carbon, innovative and resource efficient Wales.*

Cultural Considerations

- *How far the proposal supports the conditions that allow for the use of the Welsh language;*
- *Whether or not the development protects areas and assets of cultural and historic significance;*
- *Have cultural considerations and their relationships with the tourism industry been appropriately maximised;*
- *If the proposal protects areas known for their cultural value in terms of music, literature, sport and the arts; and*
- *Vibrant cultural experiences.*

Environmental Considerations

- *Will important features of the natural and built environment be protected and enhanced;*
- *Are the environmental impacts of development on health and amenity limited to acceptable levels and the resilience of ecosystems improved;*
- *Is environmental protection for people and natural resources, property and infrastructure maximised and environmental risks prevented or appropriately managed;*
- *Will high standards of restoration, remediation, decommissioning and beneficial after uses be achieved;*
- *Will the depletion of non-renewable resources be minimised, waste prevented and the efficient and most appropriate use of materials made and re-use and recycling promoted;*
- *Will the causes and impacts of climate change be fully taken into account through location, design, build, operation, decommissioning and restoration; and*
- *Does it support decarbonisation and the transition to a low carbon economy.*

4.10 Achieving appropriate sustainable development is reliant on good design. Paragraph 3.3 states: *"To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area".*

4.11 Paragraph 3.4 sets out the above in an illustrative / diagrammatic manner.



Objectives of Good Design

- 4.12 Paragraph 3.60 provides guidance for development in the countryside and states "*all new development should be of a scale and design that respects the character of the surrounding area*".
- 4.13 Section 5.6 of PPW 11 – The Rural Economy, states that "*rural areas of Wales must develop a wide base if it is to be adaptable and resilient*". This concept is reiterated in paragraph 5.6.3 of which states: "*Micro and small enterprises have a vital role to play in the rural economy and contribute to both local and national competitiveness and prosperity*".

Technical Advice Notes (TANs)

- 4.14 Technical Advice Notes (TANs) supplement the policy principles of PPW and add further detail on issues which might affect development potential of the site. TANs which are considered relevant to the proposal and should therefore be given weight are:

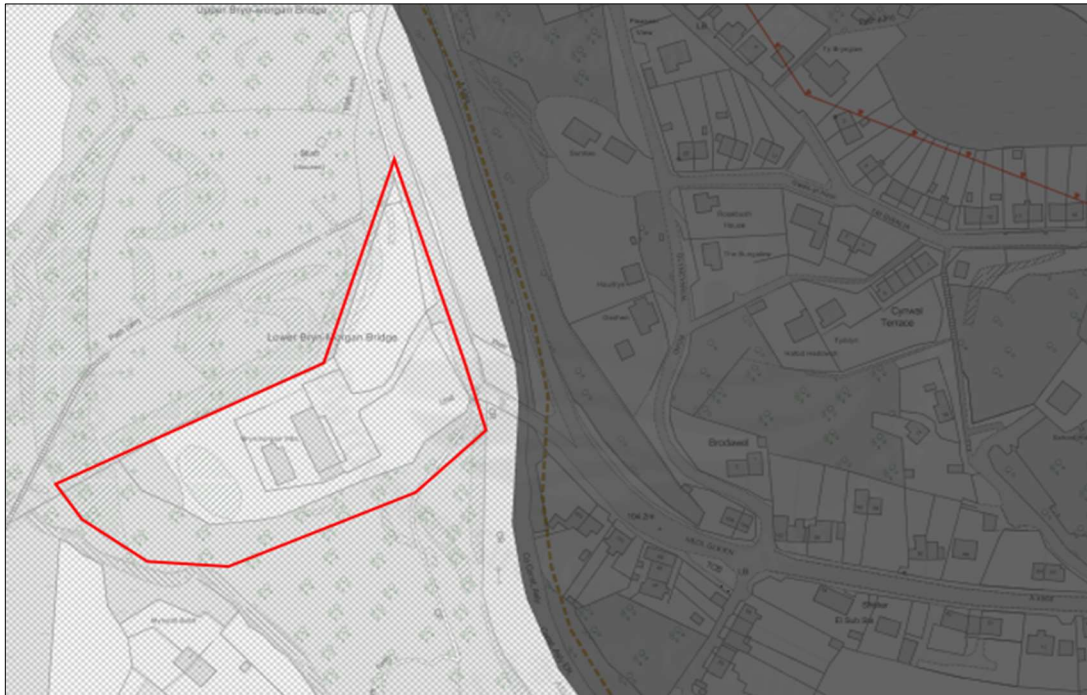
TAN	Title
TAN 12	Design (2016)
TAN 15	Development & Flood Risk (2004)
TAN 23	Economic Development (2014)

Local Planning Policy Context

4.15 The current Development Plan for Neath Port Talbot Council is the:

- The Neath Port Talbot Local Development Plan (LDP 2011-2026), adopted in January 2016.

4.16 An extract from the associated Proposals Map is provided below:



NPT LDP Interactive Proposal Map Extract

4.17 The LDP proposals map confirms the site is:

- Within proximity ableit outside Settlement Limits (SC1 – small local centres);
- Within an area of Safeguarded Minerals (M1) – Safeguarded Coal Resources;
- Within The Valleys Strategic Area (SP6); and
- Within a Settlement Protection Zone (M2/1).

4.18 The LDP Proposal map show that the site is outside the Small Local Centre of Cwmtwrch - Settlements with adequate public transport links with at least one shop and/or several community facilities. However, the site is within proximity of both Cwmtwrch and Gurnos, and therefore is considered to be adequately served by several local amenities.

4.19 Upon review of the LDP Proposals Map, the policies considered of relevance to the proposed development are considered to be:

- Policy SC1 – Settlement Limits;
- Policy SP6 – Development in the Valleys Strategy Area;
- Policy EN7 – Important Natural Features;
- Policy EN8 – Pollution and Land Stability;
- Policy M1 – Development in Mineral Safeguarding Areas; and
- Policy M2 – Surface Coal Operations.

4.20 The table overleaf provides a description of the key policies considered relevant to the proposal:

Key	Policy	Summary
SC1	Settlement Limits	Policy SC1 sets out the criteria for permitting development outside of settlement limits.
SP6	Development in The Valleys Strategy Area	Policy SP6 sets out the main measures that will be taken to implement the strategy of reinvigorating the valleys area.
EN7	Important Natural Features	Policy EN7 aims to protect and enhance local landscape features that are of importance for biodiversity, such as trees, woodland, hedgerows and other field boundaries, watercourses, wetlands and ponds and green lanes.
EN8	Pollution and Land Stability	Policy EN8 is intended to ensure that developments will not exacerbate existing problems, cause new problems or result in more people being routinely exposed to unacceptable pollution levels of any type.
M1	Development in Mineral Safeguarding Areas	Policy M1 aims to protect and safeguard Neath Port Talbot's extensive mineral resources as they are finite.
M2	Surface Coal Operations	The policy identifies where surface coal operations would be unacceptable in principle and these areas are identified on the Proposals Map.
BE1	Design	All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.

- 4.21 To summarise, the proposed development is situated in a sustainable location in an established site that comprises a community and employment facility. The proposal meets the requirements of national and local planning policy in terms of sustainability given its location and design.

Supplementary Planning Guidance (SPG)

- 4.22 Supplementary Planning Guidance (SPG) has been produced to support and add detail to the Neath Port Talbot Local Development Plan LDP 2011-2026. It is intended to provide clear guidance on the interpretation and implementation of the policy within the LDP.
- 4.23 The SPG's that are considered relevant to the proposal and should therefore be given weight include:
- Design (2017);
 - Parking Standards (October 2016); and
 - Biodiversity & Geodiversity (May 2018).

5.0 PRE-APPLICATION LPA RESPONSE

- 5.1 The Applicant engaged in pre-application discussions with NPT in order to gain some in-principle advice about the proposals for the construction of a number of self-contained 2-bed modular units.
- 5.2 The feedback received from the Council (letter dated 13th July 2022, Ref. Q2022/0111) confirmed that the principle of the development was supported, albeit for a more modest 'small-scale' extension at the side / rear of the existing building in order to make better use of the existing site and accommodation layout.
- 5.3 The LPA response stated that there were the following considerations in respect of the scheme:

Principle of Development

- *"LDP Policy SC1 sets out the criteria for permitting development outside of settlement limits. You have indicated that the proposal complies with criterion 3: 'It constitutes the small-scale expansion of an existing business or the suitable conversion of an existing building'. I disagree with this interpretation as the proposed intensification of the existing use is neither 'small-scale' (being at least a doubling of occupancy/residents) nor a conversion – the proposal is to demolish the existing outbuildings and erect new self-contained modular residential buildings over 3 phases."*
- *"Subject to compliance with all other policy criteria, it may be possible to provide a betterment (visually) for the site by removing the existing outbuildings (which are generally in poor condition) and replacing the floorspace lost with a more modest ('small-scale') extension at the side/rear of the existing building in order to make better use of the existing site/accommodation layout. Policy SC1 requires that, where development is permitted outside settlement limits, they must be located adjacent to existing buildings and be of an appropriate scale and form".*

Environmental Risks

- *"The proposed development site falls partly within a defined Development High Risk Coal Area and therefore there are coal mining features and hazards which need to be considered in relation to development proposals. Please refer to LDP Policy EN8 and associated Pollution SPG. You should seek advice from the Coal Authority as to whether or not a Coal Mining Risk Assessment will be required to accompany a planning application".*
- *"The sole/main access/egress to the site is located within a C2 Flood Zone... you should seek advice from Natural Resources Wales as to the suitability of providing additional residential accommodation".*

Highways

- *"The Highways Officer has advised that there is no highways objection to the proposed development subject to demonstrating compliance with Adopted Parking Standards and the following: SAB approval will be required prior to any work commencing".*

Biodiversity

- *"As there are a number of trees on and adjacent to the site, these should be accurately shown on the submitted plans and any new development confined to the outside of their root protection areas. Tree removal should be avoided but any*

mature native trees that are proposed to be removed (or deemed to be at risk of indirect pressure for felling in future) will be requested to be replaced on a 2:1 basis in order to mitigate for habitat loss. In accordance with planning policy requirements (Future Wales, Policy 9) biodiversity enhancements are required as part of this development and these will need to be incorporated into the design/proposals and detailed in the planning application. Advice from a suitably qualified ecologist should be sought”.

- 5.4 The comments received within the pre-application response from the LPA were taken into consideration and applied to the proposal subject of this Planning Statement.
- 5.5 Overall, it is considered that the proposal has been amended to reflect the pre-application advice and dialogue which took place and has ensured that a policy compliant scheme is put forward.

6.0 DESIGN ANALYSIS & MATERIAL CONSIDERATIONS

6.1 This section provides a detailed examination and analysis of the main planning considerations raised by the proposed development. The key planning considerations are considered to be:

- The Principle of Development;
- Demand for Childcare Housing & Services;
- Siting and Layout;
- Design, Landscaping and Visual Impact;
- Access and Parking; and
- Other Material Considerations.

The Principle of Development

6.2 Criterion 3 of Policy SC1 (Settlement Limits) is considered appropriate and relevant to assess the principle of the proposal. The policy states that development outside of settlement limits will only be permitted under a range of exceptions, the most relevant to this proposal being Criteria 3, if *"it constitutes the small-scale expansion of an existing business"*.

6.3 Springboard Education and Care can be evidenced as an existing business through the approval of application ref: P2021/0095 that permitted the use of the site for residential care and associated works. Since the approval in 2021, Brynmorgan Villa has been a successfully run establishment / business providing care, education and therapy services for young children.

6.4 As outlined in Section 5, Pre-application feedback received from the LPA in July 2022 (ref: Q2022/0111) stated that the proposal subject of the pre-application enquiry was not small-scale, as it proposed the erection of six new self-contained modular residential buildings over three phases. The proposal subject of this application has been redesigned in light of this feedback in order to respond positively to the LPA's advice, and subsequently now only proposes two units entirely.

6.5 The positive revisions made to the scheme are portrayed in the below table that compares the height (Above Ordnance Datum and Structural Sab Level), width, length and footprint of the existing care facility at Brynmorgan Villa against the two proposed units:

	Existing Care Home	Building 1 (accommodation)	Building 2 (education)
Height (AOD)	124.30	118.87	119.49
Height (SSL)	4.65m	3.30m	3.14m
Width	9.5m	7.88m	6.1m
Length	31.75m	14.5m	10.5m
Footprint	308 sqm	98.5 sqm	64 sqm

6.6 As per the above, each unit is far subservient in size and scale compared to the existing care facility. In light of the above evidence, it is considered that the proposal is now a small-scale expansion of the existing business, and thus is acceptable in principle and in line with Policy SC1.

Demand for Childcare Housing & Services

- 6.7 The demand for registered accommodation and services for young children is evidenced at an all-time high across both national and local perspectives in Wales. For example, in January 2023, the Director of the Children's Commissioning Support Resource Wales stated that the availability of beds within registered care homes for children were reducing as a result of the increase in Looked After Children by 46% since 2009 (please refer to Supporting Letter from Springboard Education and Care for more detail). In line with this statistic, upon reaching out to the LPA, Neath Port Talbot Council have reinforced the growth in Looked After Children, stating: 'placements in residential care have doubled over the last two years'. There is clearly an evidenced growth in demand for placements of children in registered residential care.
- 6.8 To further support the above statistics, Brynmorgan Villa currently receives 12 referrals per day to house additional children at the site, however, must refuse all applications due to a lack of available beds. This results in child placements within environments across Wales and England that are not required to adhere to care guidelines (as regulated by the Welsh Government through Care Inspectorate Wales and Estyn) As such, this is detrimental to the ultimate safety, quality of life and progression of the children in question.
- 6.9 The objective of this planning application is therefore to expand the current business for the sole purpose of meeting the evidenced increased demand for the placement of children across Wales and Neath Port Talbot. This will assist in alleviating current pressures on Welsh Care Facilities in placing children in unregistered homes, of which is to the betterment of those children in care as a result of the level of support received.
- 6.10 Please refer to the supporting note prepared by Springboard Education and Care submitted in support of this application that evidences the demand and need for the approval of this planning application.

Siting and Layout

- 6.11 As per drawing ref. 2303-A-010, the two units have been proposed to be built to the front of the existing care facility. The siting and layout of the two units have been sited with consideration of the feedback received from the Pre-application Enquiry (ref: Q2022/0111), as well as the conclusion of the recently commissioned Coal Mining Risk Assessment (CMRA) prepared by Rhondda Geotechnical Services that is submitted in support of this planning application.
- 6.12 The Pre-application feedback stated: *"It may be possible to provide a betterment (visually) for the site by...replacing the floorspace lost with a more modest ('small-scale') extension at the side/rear of the existing building in order to make better use of the existing site/accommodation layout"*. It was also noted that *"it would be preferable to avoid building at the front of the existing building"*.

Siting of units at the rear of existing facility

- 6.13 The pre-application enquiry (ref: Q2022/0111) proposed units in the rear of the site, however, upon conclusion of a recent CMRA, the rear of the property is not safe to develop. The CMRA details that the rear of the site was subject to past extensive mining and therefore the presence of shallow mine workings would severely impact the ability to develop in this area.

Siting of units on the side of existing facility

- 6.14 Although principally sound, the advised side extension to the existing care facility is unviable and will not prove effective for the successful operations of any expansion to the existing

business, by virtue of the services provided and guidelines adhered to. Currently, the existing care home comprises an internal configuration by which rooms are identified / segregated for specific purposes (i.e., accommodation, education, office etc) as it allows resident children to be isolated / separated if needed (of which due to the nature of the business occurs frequently). The Applicant has stated that the existing arrangement of having each identified room within the same built form is problematic, and replicating this arrangement via a linked extension will not address this concern and would not be the most efficient way of accommodating the necessary expansion.

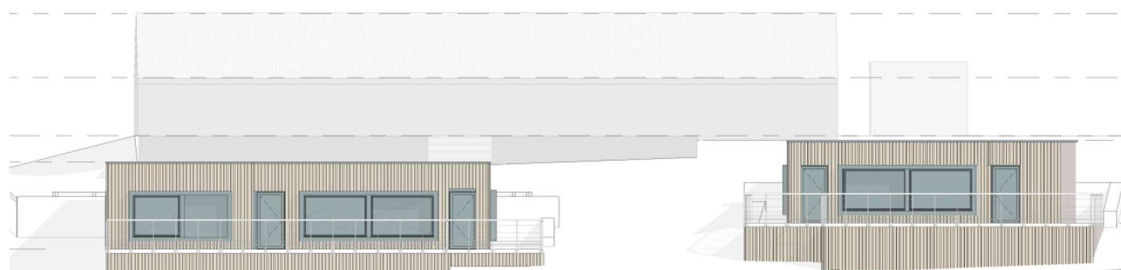
- 6.15 In light of the above, it is considered therefore that the most effective siting of the proposed units is at the front of the existing care facility. Whilst this is not 'preferable', it is considered that it is the best evidenced-based solution given the constraints of the site and business operations. It will allow the necessary and much needed expansion of the existing business whilst proposing units that are separate yet incidental to the existing care home, for the purpose of improving the ability of children and required services to be separated and segregated at appropriate times. It will mean that the business at Brynmorgan Villa can therefore adhere to guidelines to a higher standard (registered through Care Inspectorate Wales and Estyn) and ultimately operate the business more effectively and successfully.

Interim summary

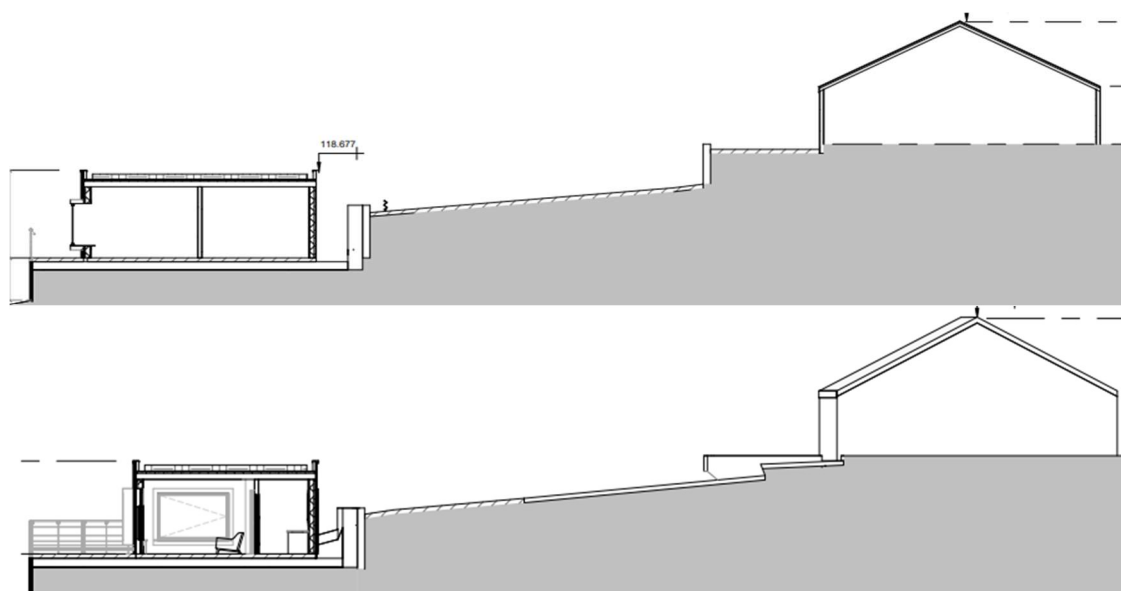
- 6.16 As per the above, it is considered that the placement of units at the front of the building is justified in light of the pre-app response and the CMRA. From a policy perspective, Policy SC1 states "*where development is permitted outside settlement limits, they **must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form***". (GJP emphasis).
- 6.17 Given the mining risks to the rear of the existing building and the limited scope to physically extend the existing building, the most logical location to expand and site the expansion of the property is to the front of the building.
- 6.18 Given that the site has constraints as explained above, it is not possible to site the additional buildings in locations 'adjacent to' the existing building as per Policy SC1. As a result, the units have been located in the most logical area for expansion – only 10 metres away, within the same curtilage of the building, and have been constructed so that they remain subservient and ancillary in nature. As such, it is considered the Policy SC1 is satisfied due to their location in close proximity to the existing building and the proposal scale and form being appropriate.
- 6.19 Similarly, in light of the results and conclusions in the CMRA, siting the units away from the rear shows accordance with Policy EN8 (Pollution and Land Stability) that advocates for proposals to be sited on stable land for the benefit of reducing the risk of future occupiers.
- 6.20 The scheme is considered wholly acceptable in light of policies SC1 and EN8, and there is no policy presumption against the proposal.

Design, Landscaping and Visual Impact

- 6.21 The acceptability of the proposal's design is assessed against Policy SC1 – Settlement Limits and BE1 – Design. Policy SC1 states *"Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible and **be of an appropriate scale and form**". (GJP emphasis).*
- 6.22 The proposed site sections are extracted below for reference:



Proposed Principal Elevations (dwg. 2303-A-201)



Proposed Site Sections (dwg. 2303-A-300)

- 6.23 As per the above, the proposed units have been designed in order to appear visually subservient to the existing care facility. As evidenced previously, the height, length, width and overall footprint of the proposed units are much lower and smaller than that of the existing care facility to ensure the proposals remain incidental and ancillary to the existing care facility. It is therefore considered that the proposal is in line with Policy SC1 that advocates for appropriately scaled development proposals.
- 6.24 Policy BE1 comprises a range of criterion of relevance to the proposal. The table overleaf outlines the policy's criteria as well as how the proposals are in accordance with each point of guidance.

Policy BE1 – Design	The proposal's compliance with Policy
1. <i>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.</i>	The proposal has been sited at the front as explained for reasons set out above. The units will be sited specifically in front of an existing retaining wall, of which comprises weathered white stone. The proposal is therefore considered to be a visual betterment.

	The appearance of the units are visually in-keeping with the natural surrounds through the proposed rustic materials including timber cladding and sedum roofs. The scale, height and massing of the units have been designed to be smaller and visually less significant than the existing care home to appear subservient and small-scale. In terms of elevational treatment, the proposal is to excavate the existing earth so that the units comprise a subterranean under-build for the benefit of reducing the height of the units so that they sit low in comparison to the existing care facility. The siting, appearance, scale, height and massing of the proposal is therefore considered to complement and enhance the character and appearance of the site.
2. <i>It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;</i>	The impact on the landscape of the proposal can be assessed through CGI drawing ref. 2303-A-400. This perspective provides a 'worst case scenario' view of the proposed units as the CGI is taken from within the curtilage of the site (not a realistic public vantage point) in order to view the entirety of both units. Realistically, from the road, the view would be far more screened due to the presence of the large evergreens and boundary wall. Additionally, the CGI depicts the units during winter when the existing and proposed landscaping and thus screening is at its worst growth / bloom. It is considered therefore that the visual impact of the proposal is not detrimental, and rather, the existing natural landscape is maintained and enhanced through the design of the units and the associated landscaping. Brynmorgan Villa is a site that comprises a steep and varying topography. This has been factored into the design of the units for the benefit of preserving the landscape and prominent skylines. For example, the ridges of the proposed units sit well below that of the existing care facility, as evidenced by the sections drawing ref. 2303-A-300.
3. <i>It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;</i>	The rustic materials proposed comprise timber cladding and sedum roofs in order to respond positively to the natural surrounds. The timber will sit sympathetically within the centre of the plot that is screened by natural vegetation. The proposal comprises the introduction of hard and soft landscaping including composite decking and various trees and hedgerow. The site is already screened well from public vantage points by large existing coniferous trees on the southern and eastern boundaries (evidenced in dwg 2303-A-099), albeit the proposed hard and soft landscaping is proposed to improve the quality and quantity of the existing screening at the site and ensure the development at the front will not cause detriment to the surrounds in terms of visual impact. The distance between the A4068 and the proposed units is circa 50 metres, with existing and proposed landscaping in between. It is therefore considered that the proposal will be entirely screened and thus have no detrimental impact on the visual amenity of the surrounding vicinity.
4. <i>It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;</i>	The proposal is not considered to adversely impact on highway safety and is considered to improve the amenity of current occupiers.
5. <i>Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;</i>	The proposal includes the removal of 10 trees for the purpose of erecting the proposed accommodation unit. This will be mitigated through the planting of 11 trees and hedgerow to enclose both proposed units, as well as the introduction of two sedum roofs.
6. <i>It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility,</i>	n/a.

<i>well-lit environments and areas of public movement);</i>	
7. <i>It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;</i>	n/a.
8. It uses resources, including land and energy, as efficiently as possible through: a) <i>Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;</i> b) <i>The layout and form of the development does not preclude the reasonable use of other adjacent land;</i> c) <i>Developing brownfield land in preference to greenfield land where possible;</i> d) <i>Minimising building exposure while maximising solar gain</i>	It was the intention of the Applicant to utilise the existing vacant hardstanding at the rear of the site, however, given the conclusions of the CMRA, this has proved unfeasible due to confirmation of previous mining activity in this area. The proposal is now sited at the front of the existing care facility for safety and operational purposes and has been designed so that its density, scale, layout and form is appropriate and sympathetic to the surrounds.
9. <i>Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;</i>	n/a.
10. <i>The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.</i>	The layout of the two units have been designed in order to ensure access for all abilities through a ramp system being constructed to allow access to the units.

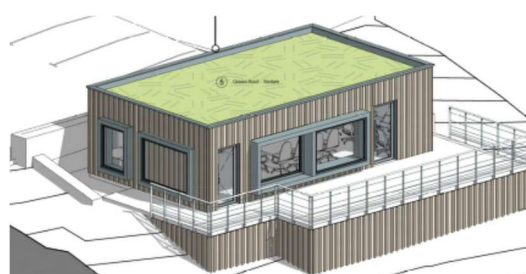
6.25 As per the above table, it is considered that the proposal has been designed in accordance with the criterion of Policy BE1 – Design, and thus should be considered entirely acceptable.

6.26 In terms of landscaping, Policy EN7 (Important Natural Features) is of relevance to the determination of application. The policy advocates for development proposals that retain, protect and enhance natural features on site, and where removal of said features is unavoidable, mitigate the impacts accordingly.

6.27 As previously stated, the proposal comprises the removal of 10 small – medium low-quality trees. This is to be mitigated via the planting of 11 trees and associated hedgerows. The proposed units are also to comprise sedum roofs and timber cladding, for biodiversity enhancement and sustainability purposes, as evidenced below:



Sustainability of proposed units



6.28 As per the above, the proposal is considered acceptable in light of Policy EN7.

Access and Parking

- 6.29 Access at the site is currently achieved off the A4068 that adjoins the site, as shown below:



Access to the site



- 6.30 Subject of approved application P2021/0095, access at the site is considered appropriate. The proposal would see the (minimal) intensification of this access point. This can be evidenced in the below rota schedule table:

	Staff
Current	08:00 - 22:00 4 staff at 1:1 ratio 22:00 - 08:00 1 staff awake, 1 staff sleep in
Proposed	08:00 - 22:00 6 staff at 1:1 ratio 22:00 - 08:00 1 staff awake, 1 staff sleep in
Intensification	2 additional staff members.

- 6.31 As per the above table, the proposal would see the addition of 2 staff members travelling to and from the site. This is not materially different to what currently exists and thus is not considered to cause detriment to the local highway or existing establishment at Brynmorgan Villa.
- 6.32 This position is reinforced by the Highway Officer's pre-application response that stated "*there is no highways objection...subject to demonstrating compliance with the Adopted Parking Standards*". The LPA's parking standards are extracted below for reference:

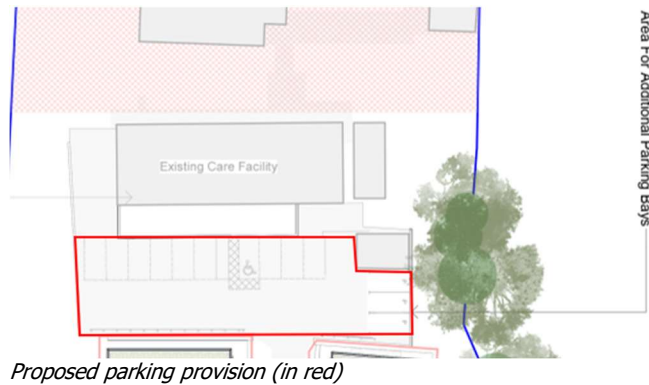
4 Neath Port Talbot Parking Standards by Land Use

4.1 Residential: New Build & Conversions

Type of Development	Residents	Visitors
General Purpose: Houses and Apartments		
Residential children's homes / homes for elderly persons / nursing homes	1 space per resident staff 1 space per 3 non-resident staff	1 space per 4 beds

NPT Adopted Parking Standards

- 6.33 The site currently comprises 10 parking spaces (with 1 disabled unit). The proposal sees the introduction of a further 3 spaces behind unit 2 (education building). This proposed parking layout is shown below for reference:



- 6.34 As per the above, the proposal is in accordance with the LPA's Adopted Parking Standards in terms of provision of spaces.
- 6.35 The pre-application feedback from the LPA also outlined concern that the sole / main access and egress to the site is located within a C2 Flood Zone, adverse to the guidance outlined by TAN 15. The LPA feedback requested a statement of how the proposed development complies with TAN 15 / the instruction of a Flood Consequence Assessment (FCA). In light of this feedback, an FCA was instructed in October 2022. This has been submitted in support of this application, albeit, concludes that *"safe access and egress as per TAN15 and Natural Resources Wales guidance will be possible from the site"*. As per the above, it is considered that proposed development is wholly acceptable from a highways and parking perspective.

Other Material Considerations

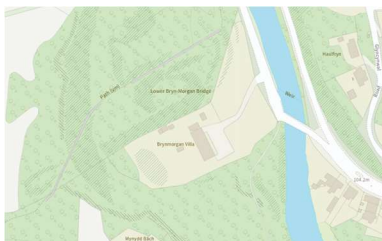
Public Rights of Way

- 6.36 As per the above extract, the site is in proximity to two footpaths – 50/111.Lgk/1 and 50/112.Lgk/1. The proposal is not considered to impact these footpaths negatively.



NPT PROW Map Extract

Heritage Impacts



Historic Wales Map Extract

- 6.37 As per the above extract from Historical Wales, the site is not subject to / in proximity to any historical designations.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 The application proposals are considered to accord with planning policies at both the national and local level. In particular, it is considered that there are a number of material considerations in support of the application, which include the following:
- In light of the revisions made from the pre-application enquiry (ref: Q2022/0111) the proposal is now considered a small-scale expansion of an existing business, and thus is acceptable in principle and in line with Policy SC1.
 - The demand for registered accommodation and services for young children is evidenced at an all-time high across both national and local perspectives in Wales. Brynmorgan Villa currently receives 12 referrals per day to house additional children at the site, however, must refuse these requests due to limited space. The demand and need for the modest intensification of the existing care facility is therefore evident.
 - The siting of the units at the front of the existing care facility has been justified through the review of the CMRA and LPA feedback, and subsequently assessed positively against Policies Policy SC1 and EN8.
 - The design of the units are appropriate in terms of size, scale and appearance, and the potential for any detrimental visual impact is mitigated accordingly. The proposal therefore accords with the design guidance as outlined within Policy BE1.
 - The proposal takes into consideration the natural value of the existing site and looks to maintain and enhance this through both materials and landscaping schedules. This is accords and responds positively to Policy EN7.
 - The proposal is considered wholly acceptable from a highways and parking perspective, as supported by the Flood Consequence Assessment and NPT Adopted Parking Standards.
- 7.2 Having regard to the above material considerations, it is considered that the proposed development represents an appropriate and policy compliant scheme, which makes good use of this existing site for further provision of accommodation on site.
- 7.3 Accordingly, it is therefore considered that the proposed development is acceptable, and we would respectfully request that the application be approved.