



PLANNING STATEMENT

Crown and Sceptre Pub, Main Road,
Cadoxton, SA10 8AP

May 2023

VISTA
PLANNING

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1. Introduction

- 1.1 This Planning Statement has been prepared to accompany an application for outline planning permission on part of the car park to the southwest of the Crown and Sceptre Public House on the opposing side of Main Road, for the erection of 2no. dwellings.
- 1.2 The application is accompanied by the following:
- Proposed Site Layout
 - Topographical Survey prepared by TAG Surveys
 - Highway Technical Note
 - Parking Survey
- 1.3 By way of background, the application is submitted by Ei Group Ltd, part of the Stonegate Group; the largest pub company in the UK whose portfolio is comprised of over 4,500 sites, split across the managed division and leased and tenanted businesses (L&T).
- 1.4 The managed pubs division, which employs over 17,000 people, is split into Branded and Traditional pubs. Branded is comprised of: Slug & Lettuce, Popworld, Be At One and Venues. Traditional (unbranded) pubs are made up of: Proper Pubs, Classic Pub & Dining, Social Pub & Kitchen and Craft Union.
- 1.5 Within the managed division the company invest £100 million annually, maintaining and refurbishing pubs and bars, creating jobs and employing many local suppliers and contractors. Within the L&T division further significant sums are invested by their Publican Partners.
- 1.6 The key focus of the company is to provide a well invested, quality pub that is right for the respective community which it serves. With a portfolio of brands and concepts as well as a range of business models from managed, tenancy, lease, managed agreements (Craft

Union) the management team review the portfolio to identify the opportunity that best fits the pub which sometimes involves moving pubs from one division to another.

- 1.7 Throughout this review often surplus land, car parking and pubs that have been unviable business operations are identified. This now presents an opportunity to release additional value which can be re-invested into the estate, including within the identified site or within the overall portfolio.
- 1.8 Stonegate pubs sit at the centre of their community for many reasons. Over £1.5 million is raised for local charities and community needs within the managed division alone; over 78% are involved in a community safety programme including Best Bar None, National Pubwatch, Purple Flag, Business Improvement Districts and Town Centre Management programmes as well as Community Alcohol Partnerships. Over 17,000 people are employed across the country within the managed division with many thousands more employed within the L&T division.
- 1.9 Stonegate Group also invest in support for rural communities and pubs, contributing to and working with 'Pub is the Hub', in providing essential facilities within rural communities.
- 1.10 The hospitality sector has been through a turbulent time since the Covid-19 pandemic, with the overall hospitality sector seeing the biggest economic decline of all sectors during the pandemic. The company's strong leadership saw their people supported throughout with regular communication; mental-health assistance, financial support, personal access to colleagues and senior team members as well as significant financial and business support for their publican partners. A loyal and stable workforce emerged from the pandemic to face further challenges with the economic downturn, rising energy costs and interest rates.
- 1.11 Today, Stonegate's performance remains market leading which in turn has enabled continued investment in their people, pubs and bars and in continuing to create jobs across the UK. This untapped opportunity to realise the value of unused assets will further add value to communities as Stonegate Group continues to invest for the future.

2. Proposed Development

- 2.1 The application seeks outline planning permission for the erection of 2no. dwellings. All matters, except for access, are reserved for the subsequent determination of the Local Planning Authority. The application therefore seeks approval for the principle of housing on the application site and the point of access and parking provision only.
- 2.2 The application is accompanied by an Illustrative Layout which shows how 2no. dwellings could occupy the plot and sit in harmony with the retained parking provision for the public house. It is envisaged that they would be arranged as a pair of detached 4-bed properties fronting onto Main Road.
- 2.3 Scale and appearance are both reserved matters but it is envisaged that the properties would be two storey and would reflect the height and external appearance of neighbouring development to the south of the application site. These are matters that would be determined under a reserved matters application, or a subsequent Full application.
- 2.4 Access is provided via the existing access point on to Main Road with parking and turning provided to the rear of the proposed properties. 6no. parking spaces would be provided (3x per property). They would share the access onto Main Road with the existing and retained pub car park, with a dedicated and clearly demarked private parking area to the southwest of the retained pub car park. The entrance into the proposed residential development would, it is envisaged, be clearly identified and separated by landscaping, and would be located to the rear of the existing car park.
- 2.5 Each property would provide 4-bedrooms with the illustrative plans showing how this might be formed. Note that gardens of a significant size could be provided, that are consistent with surrounding residential gardens and plots.
- 2.6 The pub car park would be retained and 20no. parking spaces would be delineated. An accompanying parking survey has been submitted to consider the proposed loss of parking provision as part of the scheme.

3. Site Description

- 3.1 The application site forms a part of the existing pub car park to the Crown and Sceptre, Cadoxton. The application site is located to the south of the Crown and Sceptre itself and is separated from the public house by Main Road. The application site sits within the western portion of the current car park which is laid as hard standing.
- 3.2 The pub car park is access on via the entrance on the southern side of Main Road, to the south of the pub.
- 3.3 The site is bound on its northern boundary by Main Road, with the pub itself situated on the opposing side of the highway, with the rear of residential properties immediately opposite the application site. To the south, east and west of the application site residential properties and their rear gardens are situated. As only part of the existing car park is to make up the application site, the eastern boundary of the proposed development would comprise of the retained pub car park.
- 3.4 The site does not contain any vegetation and is devoid of any form of biodiversity, as the entire site consists of car parking that is finished in loose bound gravel and hard standing.
- 3.5 The site is located within the settlement boundary of Cadoxton and falls within Flood Zone 1; an area least at risk of flooding. The site does not contain or sit within the curtilage of any listed buildings or structures. There are no other constraints associated with the application site.

4. Planning History

4.1 There is no relevant planning history relating to the application site itself.

5. Planning Policy

- 5.1 The Development Plan for Neath Port Talbot County Borough Council comprises The Local Development Plan for Neath Port Talbot Council 2011-2016 (Adopted January 2016).

The Plan for Neath Port Talbot Council ('hereafter referred to as the LDP')

- 5.2 The following policies of the LDP are considered relevant to the application proposal:

- Policy SP3 – Sustainable Communities
- Policy SC1 – Settlement Limits
- Policy SC2 – Protection of Existing Community Facilities
- Policy SP5 – Development in the Coastal Corridor Strategy Area
- Policy SP7 – Housing Requirements
- Policy SP15 – Biodiversity and Geodiversity
- Policy SP20 – Transport Network
- Policy EC4 – Protection of Existing Employment Uses
- Policy TR2 – Design and Access of New Development

Supplementary Planning Guidance (SPGs)

- 5.3 The following SPGs are considered relevant to the application proposal:

Biodiversity and Geodiversity SPG

- 5.4 This document provides information and guidance setting out the expectations on all development proposals to protect, conserve, enhance and manage important habitats, species and sites of geological interest.

Parking Standards SPG

- 5.5 This document provides guidance on the required parking provision associated with all forms of development, as well as detailed guidance on how the standards should be applied on a case by case basis.

Planning Policy Wales (PPW) Edition 11

- 5.6 Paragraph 1.18 of the PPW reiterates that planning applications for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. It goes on to state that applications should be determined with a presumption in favour of sustainable development.
- 5.7 Paragraphs 1.18 and 1.20 states that the purpose of the planning system is to contribute to the achievement of sustainable development. In achieving sustainable development, paragraph 1.18 states that the planning system has three overarching objectives, namely an economic objective, a social objective and an environmental objective.
- 5.8 Section 2 sets out Government's policy in respect of design and is headed by paragraph 2.1 which outlines that the creation of high quality and sustainable buildings, places and communities is fundamental to what the planning and development process should achieve.
- 5.9 Paragraph 4.2.11 is clear that where under delivery of housing against the council trajectory is itself a reason to review the development plan and consider the weight placed on the relevant policies contained there within.
- 5.10 PPW sets general objectives for sustainable development within Wales, a number of which are relevant to this application: "Planning policies, decisions and proposals should:
- Promote resource-efficient and climate change resilient settlement patterns that minimise land-take (and especially extensions to the area of impermeable surfaces) and urban sprawl, especially through preference for the re-use of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites.
 - Locate developments so as to minimise the demand for travel, especially by private car.
 - Minimise the risks posed by, or to, development on or adjacent to unstable or contaminated land and land liable to flooding

- Contribute to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems. In particular, planning should seek to ensure that development does not produce irreversible harmful effects on the natural environment and support measures that allow the natural heritage to adapt to the effects of climate change.
- Help to ensure the conservation of the historic environment and cultural heritage, acknowledging and fostering local diversity.
- Ensure that all local communities - both urban and rural - have sufficient good quality housing for their needs, including affordable housing for local needs and for special needs where appropriate, in safe neighbourhoods.

- 5.11 Guidance encourages development in locations “which has relatively good accessibility by non-car modes”, as it is set within easy reach of local facilities and a key urban settlement which can be reached by non-car modes of transport.
- 5.12 PPW is supportive of applications relating to previously developed (or Brownfield) land, particularly sites “in and around existing settlements where this is vacant or under used-land or commercial properties...”. Previously developed land (Brownfield) is defined in PPW as “land is that which is or was occupied by a permanent structure... and associated fixed surface infrastructure. The curtilage of the development is included.”.
- 5.13 PPW ensures that the biodiversity and landscape value of the area is preserved and “reasonable steps are taken to safeguard or enhance the environmental quality”.
- 5.14 PPW states that; “Land use planning can help to achieve the Welsh Government’s objectives for transport through: **“reducing the need to travel, especially by private car, by locating development where there is good access by public transport, walking and cycling;”**
- 5.15 National Policy is clear in the importance of making the most efficient use of available land within the settlement by developing the site at a suitable and appropriate density.

- 5.16 Para. 3.43 highlights the preference for the re-use of previously developed land stating that “Local planning authorities should address the scope and potential for rehabilitation, conversion, clearance and redevelopment when considering suitable sites for housing development”, and that use of reclaimable land will assist in easing pressure for the development of Greenfield sites. This site would assist in meeting these objectives, and indeed it has been allocated for housing development within the Local Development Plan.
- 5.17 Guidance is also provided on identifying suitable sites for development, stating that Authorities should seek to utilise previously developed land within existing settlements before Greenfield sites.

Technical Advice Notes (TANs)

- 5.18 Technical Advice Note 18 (Transport): Provides additional guidance on issues relating to parking and the design and layout of proposed development.
- 5.19 Technical Advice Note 23 (Economic Development): Provides additional guidance on issues relating to development where planning decisions relate to the balance of social, economic and environmental considerations.

6. The Main Issue(s)

6.1 The main issues that are considered to be as follows:

Issue 1 – Principle of Development

Issue 2 – Design/Character

Issue 3 – Access, Highway Safety and Parking

Issue 4 – Residential Amenity

Issue 5 – Biodiversity

Issue 1 – Principle of Development

6.2 The application site is located wholly within the settlement boundary for Cadoxton. LDP objective OB7 states that “**development must** provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population.” The site is located within a settlement boundary and within walking distance of strong public transport links with bus stops located on Main Road within 50m, as well as existing education, retail and employment services. It is therefore considered that the proposed development would result in a windfall site that meets the needs of the local populous in a sustainable location.

6.3 Policies SP3 and SC1 relate to the location of new development. In respect of housing they state that proposals consistent with other relevant policies will be supported within settlement boundaries.

6.4 Policy SC1 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 proposed development makes efficient use of the site, whilst not resulting in overdevelopment and does not harm the long term viability or operations of the Crown and Sceptre. It is therefore considered that the application site accords with the requirements of Policy SC1 and the erection of No.2 dwellings is of a scale and form that is appropriate for the site and surrounding area.

- 6.5 Further to this, the council can currently demonstrate a housing land supply of 4.5 years as per the most recent Joint Housing Land Availability Study (2019). With this being the most up to date assessment, certain Policies within the LDP are considered to be out of date and therefore carry limited weight when assessed against proposed delivery of housing. The delivery of proposed housing that accords with the strategic and sustainable development principles of the LDP therefore carry significant weight in the decision making process.
- 6.6 This is consistent with PPW which seeks to achieve sustainable development (social, economic and environmental). Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. A material consideration which carries even more weight in light of the most recent housing land suppl.
- 6.7 PPW promotes making effective use of land. It states that planning decisions, "...should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions."
- 6.8 The application site comprises part of a large, under-used car park associated with The Crown and Sceptre public house. It is situated within the defined Cadoxton settlement boundary and within an existing residential environment.
- 6.9 The proposed development would allow for additional investment into the Crown and Sceptre. As such, the erection of no.2 dwellings in this location, far from harming the continued operations of the public house, would further strengthen the establishment's resilience and ensure that the public house continues to operate into the future. As such the proposal is compliant with Policy SC2 in that it protects an existing community facility by ensuring continued investment.
- 6.10 In summary, the site is within the settlement boundary of Cadoxton. It is within a sustainable location and comprises previously developed land. The development of the

site for 2no. dwellings represents the effective use of land which has long been under-used and surplus to operational requirements.

- 6.11 The principle of development is therefore considered to be consistent with the relevant policies of the LDP, as well with PPW and is consequently considered to be acceptable.

Issue 2 – Design/Character

- 6.12 The application site is situated within a residential environment, to the rear of housing fronting Maes Llwynonn to the south.



- 6.13 The site is viewed through the context of the existing pub car park. Clear views of the proposed development from the north of the site are possible, with the proposed dwellings fronting onto the highway and presenting active frontages onto the public realm.
- 6.14 The image above shows the submitted illustrative layout which indicates that housing will respond well to the wider pattern of development to the south and south east and respects the urban grain of the surrounding area. The new view would not appear incongruous within this setting and it is submitted that the wider character and appearance of the area would be maintained if not enhanced.

- 6.15 Indeed, the proposed works will include formalisation of the car park and new landscape planting. These works, along with the addition of the 2no. new properties would represent an opportunity to enhance the visual impact of the existing pub car park and application site when viewed from Main Road.
- 6.16 Matters of layout, appearance, scale and landscaping are reserved matters but there is no sound planning reason why a modest development of 2no. residential properties cannot be delivered that would be in keeping with the immediate environment and establish surrounding land use.
- 6.17 The construction of 2no. dwellings is thus considered to make best use of this under-used land in a manner wholly consistent with the prevailing character and appearance of the area such that, on design grounds, the application is considered to be acceptable.

Issue 3 – Access, Highway Safety and Parking

- 6.18 Access is not a reserved matter so this application seeks approval of the point of access. The proposed development would utilise the existing pub car park access on to Main Road.
- 6.19 The proposed development would use an existing vehicle access onto the highway, which enjoys acceptable visibility splays that can be achieved at the site entrance on to the highway. When considered alongside the modest traffic generated by the proposal, it is not considered that the proposed development of 2no. dwellings would result in an unacceptable level of intensification of the site access that would be detrimental to highway safety.
- 6.20 The low numbers of deliveries to the pub will continue to be served with these being managed by the tenant. However, as the pub itself is separated from the pub car park and application site, it is considered that the proposed development would have no impact on or be influenced by deliveries to the pub.

- 6.21 Within the site, access to the residential development's parking provision will continue through the car park and will spur off on the south-western side to a private way, clearly delineated. Parking for 6no. cars is provided within the site for the proposed 2no. dwellings, ensuring that the proposed dwellings comply with the parking requirements set out within the Parking Standards SPG. Space is provided for turning such that occupants can enter the pub car park in a forward gear.
- 6.22 With regards to the parking for the pub, the submitted layout shows that 20no. parking spaces would remain. They would be delineated and made available solely for use by the pub. The submitted Transport Statement refers to the Car Parking SPD and notes that, when measures against the 130sqm of public area within the pub, parking for some 27 cars should be provided (including 1no. for staff). Parking immediately in front of the pub exists for 1no. space so the car park layout shown on the submitted layout shows 6no. spaces below the guidance within the SPD.
- 6.23 As such, a Parking Survey has been conducted to assess the parking demands of the pub and the potential impact of the No.2 dwellings on this provision. The parking survey is contained within the accompanying Highway Technical Note and should be read in conjunction with this Planning Statement, however the parking survey concluded that:
- “Based upon the parking surveys conducted, the Crown & Sceptre Inn requires a parking provision of 19 spaces, therefore, the provision of 20 as part of the development proposals is considered to be adequate for the needs of the pub. It has therefore been demonstrated by the parking surveys that there is sufficient capacity off-street to accommodate for the existing peak parking demand from the Crown & Sceptre Inn.”**
- 6.24 It is also noted that the car park is located a distance from the pub. Those visiting by private car are very likely to park immediately alongside the pub on the road where there are no parking restrictions. Moreover, if the car park was full, the highway is wide enough and free of parking restrictions such that occasional overspill would not cause a risk to highway or pedestrian safety or restrict the free flow of traffic on the highway network.

- 6.25 With regards to highway safety, the proposed access is therefore considered to be safe and wide enough for the proposed development. It is also evident that the proposed development would result in adequate parking provision within the public house car park and would not result in a shortfall or increased on street parking. The proposed development would therefore not result in harm to pedestrian or highway safety.

Issue 4 – Residential Amenity

- 6.26 Layout and appearance are reserved matters which means the LPA, and thus neighbouring residents, will be able to comment on the precise relationship. However, it is evident from the submitted Illustrative Layout that a development can be achieved that does not impact on daylight/sunlight, outlook or privacy to neighbouring properties.
- 6.27 The proposed development would meet the required separation distances and as such would not result in a sense of enclosure, or be overbearing to existing residential properties.
- 6.28 The orientation of the proposed properties would ensure that habitable rooms would not face onto the rear elevations or external amenity spaces of existing residential properties. As such the proposed development would not result in a loss of privacy.
- 6.29 The proposed gardens would be of sufficient size to meet the needs of a family and raises no issue in respect of future living conditions for new occupants.
- 6.30 Whilst the layout and design of the scheme is to be considered at the Reserved Matters stage, it is clear that the application site is capable of delivering no.2 detached dwellings without resulting in harm to the amenity of adjacent residential dwellings.

Issue 5 – Biodiversity

- 6.31 The application currently consists of the pub car park and consists entirely of hard standing with no vegetation or biodiversity contained within the site.

- 6.32 The proposed development would offer opportunities to provide significant BNG on site by landscaping within the external amenity spaces of the properties themselves and within the area providing separation between the pub car park and the private parking areas.
- 6.33 Suitably worded conditions can be included to secure appropriate BNG at either the Reserved Matters stage, or via pre-commencement conditions should the LPA consider this necessary.
- 6.34 It is therefore considered that the proposed development complies with the requirements set out within Policy SP5 of the LDP, in that the scheme would not result in a net loss of biodiversity and in fact offers opportunities for significant BNG on site.

7. Conclusion

- 7.1 The application site is located within the settlement boundary of Cadoxton, wherein the principle of development is considered to be acceptable, subject to broad matters of design, character and amenity.
- 7.2 The submitted Illustrative Layout shows how 2no. dwellings can be constructed that would be in keeping with the prevailing character and appearance of the area. The proposal itself envisages two storey properties that would be a similar height to nearby housing.
- 7.3 The layout is a reserved matter but it is evident that housing can be situated upon the site without causing harm to neighbouring amenity.
- 7.4 The access is provided via the existing access which serves the pub car park. Good visibility can be achieved in either direction and the proposed development would generate few vehicular trips. Notably those that are generated would be at different times of the day (generally) than when the pub would be at it's busiest. The Illustrative Layout shows that the site can accommodate 3no. parking spaces per property with adequate room for turning such that vehicles can leave the site in a forward gear. The accompanying Parking Survey has also demonstrated that the proposed development would retain adequate parking provision within the public house car park and as such would not result in harm to pedestrian or highway safety.
- 7.5 The proposed development would offer an opportunity to provide significant BNG via landscaping provided across the application site. The current hard standing of the site, allows for clear gains that can be achieved at the Reserved Matters stage.
- 7.6 In light of the above the proposed development accords with the development plan and thus, subject to conditions, the LPA are respectfully asked to recommend the application for approval.

