

# PLANNING STATEMENT

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## **LAND TO THE EAST OF HIGH STREET SEVEN SISTERS NEATH PORT TALBOT**

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September 2023



## Summary

**Proposal:**

Full application for the proposed development of a single storey childcare centre (use class D1), including access, parking, drainage, landscaping arrangements and all associated works.

**Location:**

Land to the east of High Street, Seven Sisters, SA10 9DH

**Date:**

September 2023

**Project Reference:**

S23.148

**Client:**

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## 1.0 Introduction

- 1.1 This Planning Statement accompanies a full planning application submitted on behalf of Neath Port Talbot County Borough Council for the proposed development of a single storey childcare centre (Use Class D1), including access, parking, drainage, landscaping arrangements and all associated works at land to the east of High Street, Seven Sisters.
- 1.2 The project forms part of the Childcare Offer Capital Programme, supported by Welsh Government.
- 1.3 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:
  - **Section 2:** provides a description of the site and its surroundings, including a review of the site's Planning History.
  - **Section 3:** provides a review of the site's planning history
  - **Section 4:** provides an overview of pre-application dialogue undertaken in regard to the emerging scheme.
  - **Section 5:** summarises the development proposals.
  - **Section 6:** outlines the relevant planning policy context, at both the national and local level.
  - **Section 7:** addresses the key planning considerations associated with the development proposal.
  - **Section 8:** provides a conclusion regarding the overall acceptability of the application.

## 2.0 Site Description & Surrounding

- 2.1 The site is located in the western area of the village of Seven Sisters and is largely comprised of previously developed land. A care home originally occupied the site, however has since been demolished. Much of the land now comprises reclaimed grassland and shrubbery, with the northwestern area of the site being the only area where evidence of prior development remains. Here, access to the site is obtained via High Street, and is currently used as an unofficial parking area. The site has the following grid coordinates E:281960, N:208932.
- 2.2 Strong treelines straddle the eastern, western and southern boundaries of the site, and a low-lying wall is located along the site's northern and western boundaries.
- 2.3 In terms of immediate surroundings, the site is located in a largely residential area. A disused rail line abuts the eastern boundary of the site, which originally provided freight access to Onllwyn coal washery.
- 2.4 Blaendulais bridge adjoins the northeastern boundary of the site, and provides pedestrian access over the rail line from the A4109. A public open space also adjoins the site to the north, and several historical artefacts are located here, which depicts the areas' mining heritage.
- 2.5 The site lies in an inherently sustainable location with access to a range of services and facilities in Seven Sisters. For example, a corner shop is located approximately 20m to the west of the site, along High Street, and Seven Sisters Community Hall is located approximately 180m to the northeast. Here, a wide range of services are provided, such as meeting and conference facilities, a library, a computer suite, and sports and fitness facilities in the form of an Astro turf pitch, and a park for local children. The village also has its own rugby and football teams, and their facilities are located approximately 575m to the southwest of the site.
- 2.6 A review of Natural Resources Wales' Development Advice Map reveals that the site lies within Flood Zone A. As such, is considered to be at little or no risk of fluvial or tidal/coastal flooding. In respect of surface water, NRW's Flood Map for Planning identifies that the central areas of the site, along with the western, northern, and eastern boundaries of the site lie within Flood Zones 2 and 3 in respect of surface water and small watercourse flooding.
- 2.7 A review of Cadw's records reveals that the site is not occupied by any listed buildings or scheduled ancient monuments. The nearest historical asset relates to a war memorial which lies approximately 150m to the west of the application site. The war memorial is

designated as a Grade II Listed Monument (Cadw Ref: 82050) and is separated from the site by existing residential development. Development of the site will therefore not impact any designated heritage assets. On this basis the historic environment will not present a constraint to the development.

- 2.8 A review of Ordnance Survey mapping reveals that there are no Public Rights of Way (PROW) within the site boundary. A public footpath adjoins the northern boundary of the site, and travels to the north through a forest.
- 2.9 In respect of public transport, two bus stops are located along High Street, one of which adjoins the western site boundary. Here, the X8 Cymru Clipper provides an hourly service to Coelbren to the northeast and Neath to the southwest. The closest train station is located approximately 15km to the southwest of the site in Neath. Rail passengers can access destinations such as Swansea to the southwest and Cardiff to the southeast.
- 2.10 In light of the above, the site is located in a sustainable and accessible location; the site is accessible to pedestrians, cyclists and public transport users. This increases the possibility that journeys generated by the development can be made by sustainable forms of transport.

### 3.0 Planning History

- 3.1 The site has been subject to a number of planning applications in recent years. Those that lie within the application site's boundary are identified below.

| Ref        | Description                                                                                                                                                 | Decision                                               |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| P2010/0802 | Prior notification for proposed demolition of Canolfan Sheltered Housing Complex                                                                            | Prior notification approval not required<br>05/11/2010 |
| P2013/0963 | Residential development for up to 19 units (Outline)                                                                                                        | Approved<br>21/09/2015                                 |
| P2018/0754 | Variation of condition 3 and 4 of outline planning permission P2013/0963 granted on 21-Sep-2015 to extend period of time for submission of reserved matters | Withdrawn<br>31/07/2019                                |

|  |                                 |  |
|--|---------------------------------|--|
|  | and commencement of development |  |
|--|---------------------------------|--|

## 4.0 Pre-Application Dialogue

### Pre-Application Discussions

- 4.1 A pre-application enquiry was submitted to Neath Port Talbot County Borough Council in January 2022 (Ref: Q2022/0006).
- 4.2 The feedback was largely positive and the principle of development was considered acceptable. The site is also unlikely to have an overbearing effect on local residents due to its proposed location away from the site's boundary.
- 4.3 Notwithstanding, due to the site currently containing a number of trees, it was recommended that the proposals incorporate green infrastructure into its design. Furthermore, a tree survey and landscape scheme are required as part of a formal submission of a planning application to the local authority. In light of the above, all aspects have been included within the application package for the development.

### Pre-Application Consultation

- 4.4 In accordance with Part 1A of 'The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016" (DMPO 2016), all major developments are required to be subject of pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority.
- 4.5 Given that the site is less than 1hectare in size, a pre-application consultation is not required to support this planning application.

## 5.0 Development Proposals

5.1 The Vision of the project is to redevelop the site, which is currently used in part as an informal parking area and comprises areas of hardstanding and shrubbery and vegetation, to provide a single storey childcare centre (Use Class D1), alongside access, parking, drainage, landscaping arrangements and all other associated works.

5.2 The proposals would benefit the village of Seven Sisters as a childcare need has been identified both within the community and within Neath Port Talbot County Borough Council's Childcare Sufficiency Audit (CSA), which is a statutory assessment requirement for all councils.

### **Design, Scale and Layout**

5.3 The accompanying plans illustrate that the site is capable of being redeveloped to provide the following elements within the proposed childcare facility:

- Entrance Lobby;
- Office;
- Staff and accessible WC facilities;
- Sheltered external play area;
- External play area;
- Main childcare area;
- Plant room;
- Store room;
- Kitchen / preparation area; and
- Children's WC facilities

5.4 As highlighted above, the proposed childcare facility will be a single storey in height. Dwellings in the surrounding area are a mixture of single storey bungalows and two-storey houses. As such, the proposals can be considered of a proportionate scale for the locality.

5.5 The proposed layout of the site ensures that appropriate separation distances are retained on the boundaries of the site, thus ensuring no harmful overlooking, overbearing or overshadowing impact on nearby residents. This helps retain the amenity levels in the locality.

5.6 The appearance of the proposed development will fit into the current surroundings of the area, whilst also ensuring that it has a modern touch.

### **Access and Parking**

5.7 Vehicle access to the site will be provided via High Street, which is located along the western boundary of the site. An existing vehicle access is located along this boundary, and will be utilised to gain

access to the proposed parking facilities. The development will include 11no. car parking spaces, which includes 1no. disabled space.

- 5.8 A separate pedestrian access will be provided to the site, also along High Street. This will be in the form of a DDA compliant ramp, which will replace the existing steps to the site at this location. The pedestrian access will feed into a pedestrian footpath within the site to allow to access the building entrance.

**Landscaping**

- 5.9 In terms of proposed landscaping, new trees are to be planted to the east and south of the proposed childcare facility. Wildflower planting is also proposed along the southeastern and southern boundaries, and species rich grassland will be used throughout the site.

## 6.0 Planning Policy Context

### Introduction

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
  - Neath Port Talbot Local Development Plan (adopted December, 2014)
- 6.2 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:
- Planning Policy Wales Edition 11 (February, 2021), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
  - Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
  - Neath Port Talbot Council Supplementary Planning Guidance.
- 6.3 This section of the Planning Statement provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this application. For ease of reference, this overview is set out below at the national and local level.

### National Level

#### **National Development Framework: Future Wales – The National Plan 2040**

- 6.4 The National Development Framework: Future Wales – the National Plan 2040 was published on 24<sup>th</sup> February 2021. 'Future Wales' sets out the Welsh Government's strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.
- 6.5 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. The 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time, which are as follows:

*A Wales where people live:*

1. *...and work in connected, inclusive and healthy places*
2. *...in vibrant rural places with access to homes, jobs and services*
3. *...in distinctive regions that tackle health and socio-economic inequality through sustainable growth*
4. *...in places with a thriving Welsh Language*
5. *...and work in towns and cities which are a focus and springboard for sustainable growth*
6. *...in places where prosperity, innovation and culture are promoted*
7. *...in places where travel is sustainable*
8. *...in places with world-class digital infrastructure*
9. *...in places that sustainably manage their natural resources and reduce pollution*
10. *...in places with biodiverse, resilient and connected ecosystems*
11. *...in places which are decarbonised and climate-resilient.*

#### Placemaking

6.6 Placemaking forms a key concept upon which many national planning policies are based. *"Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration."*

6.7 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

#### *"Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking*

*The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:*

- *Creating a rich mix of uses;*
- *Providing a variety of housing types and tenures;*
- *Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *Increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*

- *Integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment."*

#### Biodiversity and Green Infrastructure

- 6.8 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

##### *"Policy 9 – Resilient Ecological Networks and Green Infrastructure*

*To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:*

- *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being."*

#### Transport

- 6.9 Future Wales identifies that transport in Wales is currently dominated by the car and that *"our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people's everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people's health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation"* (page 85).

- 6.10 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *"to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel"* (page 85).

#### **Planning Policy Wales Edition 11**

- 6.11 Planning Policy Wales (PPW) Edition 11 was published on 24<sup>th</sup> February 2021. The primary objective of PPW is 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, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.

- 6.12 Sustainable Development is defined at Page 7 of PPW as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*.

Previously Developed Land

- 6.13 PPW highlights that *"Previously developed land (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development."*

Good Design

- 6.14 The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW where it is stated that *"Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. 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"*.
- 6.15 Good design must enable development proposals to address the issues of inclusivity and accessibility for all, and it is highlighted at Paragraph 3.6 that *"This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport"*.
- 6.16 In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals - Paragraph 3.7 states for example that *"Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution"*.

- 6.17 The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8: "Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places".
- 6.18 Paragraph 3.12 outlines that good design is also about avoiding the creation of car-based developments by minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. It is stated that *"Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate"*.

#### Sustainable Transport

- 6.19 PPW advises at Paragraph 4.1.10 that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:
- *"are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
  - *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
  - *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling"*.
- 6.20 Paragraph 4.1.11 summarises that: *"Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services"*.
- 6.21 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. Paragraph 4.1.13 sets out that *"The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport"*.

#### Public Transport

- 6.22 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this *“by locating development where there is, or can be, good access by public transport”*.

#### Community Facilities

- 6.23 Paragraph 4.4.1 relates to Community Facilities and states that *“Community facilities perform various functions which cover a broad range of activities and services that can be delivered by the public, private and third sectors. Community facilities contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places. They can include schools, cultural facilities, health services, libraries, allotments and places of worship.”*
- 6.24 Paragraph 4.4.2 stipulates that *“Planning authorities should develop a strategic and long-term approach to the provision of community facilities when preparing development plans based on evidence. When considering development proposals planning authorities should consider the needs of the communities and ensure that community facilities continue to address the requirements of residents in the area.”*

#### Green Infrastructure

- 6.25 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.5 that *“The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places”*.

#### Sustainable Drainage Systems (SuDS)

- 6.26 The importance of considering SuDs as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *“The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development”*. It is advised at Paragraph 6.6.19 that *“Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified”*.

#### **Technical Advice Notes**

- 6.27 The following Technical Advice Notes (TANS) are of relevance to the development proposal.

- 6.28 TAN 5 Nature Conservation and Planning (2009): provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.
- 6.29 TAN 11 Noise (1997): provides advice on how the planning system can be used to minimise impact of noise without placing unreasonable restrictions on development. It outlines some of the main considerations which local planning authorities should take into account in drawing up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.
- 6.30 TAN 12 Design (2016): provides advice on design considerations and states that development should aim to:
- *Create places with the needs of people in mind, which are distinctive and respect local character*
  - *Promote layouts and design features which encourage community safety and accessibility*
  - *Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles*
  - *Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building*
  - *Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards*
  - *Secures the most efficient use of land including appropriate densities*
  - *Consider and balance potential conflicts between these criteria*
- 6.31 TAN 18 Transport (2007) confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.

### **Local Level**

#### **Neath Port Talbot Local Development Plan 2011 – 2026**

- 6.32 The Neath Port Talbot Council Local Development Plan (LDP) was adopted in 2016 and comprises part of the prevailing development plan for the area. The application site is located within the settlement

boundary, where development is normally permitted and on 'white land'. It is therefore not subject to any specific allocations or constraints.

- 6.33 The following LDP policies are of relevance in the determination of the Planning Application.

| Policy Ref                  | In relation to                           |
|-----------------------------|------------------------------------------|
| <i>Strategic Policies</i>   |                                          |
| SP1                         | Climate Change                           |
| SP2                         | Health                                   |
| SP3                         | Sustainable Communities                  |
| SP4                         | Infrastructure                           |
| SP6                         | Development in the Valleys Strategy Area |
| SP11                        | Employment Growth                        |
| SP15                        | Biodiversity and Geodiversity            |
| SP16                        | Environmental Protection                 |
| SP19                        | Waste Management                         |
| SP20                        | Transport Network                        |
| <i>Topic Based Policies</i> |                                          |
| SC1                         | Settlement Limits                        |
| I1                          | Infrastructure Requirements              |
| TR2                         | Design and Access of New Development     |
| BE1                         | Design                                   |
| W3                          | Waste Management in New Development      |

- 6.34 Of particular relevance to the proposal is Policy SP3 (Sustainable Communities) which states:

*"The delivery of sustainable, healthy and cohesive communities and the conservation of the countryside will be promoted by:*

- 1. Defining sustainable communities and locations for development by the identification of a settlement hierarchy that reflects the role and function of settlements;*
- 2. Defining settlement limits within which development which accords with the settlement hierarchy will be permitted in principle;*
- 3. Resisting inappropriate development outside settlement limits."*

- 6.35 In addition, Policy SP16, which relates to Environmental Protection, states:

*"Air water and ground quality and the environment generally will be protected and where feasible improved through the following measures:*

- 1. Ensuring that proposals have no significant adverse effects on*

*water, ground or air quality and do not significantly increase pollution levels;*

- 2. Giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable;*
- 3. Ensuring that developments do not increase the number of people exposed to significant levels of pollution."*

6.36 Finally, Policy TR2 (Design and Access of New Development) identifies that:

*"Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:*

- 1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;*
- 2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;*
- 3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;*
- 4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation."*

#### **Supplementary Planning Guidance**

6.37 The following Supplementary Planning Guidance (SPG) adopted by Neath Port Talbot Council is of relevance to the proposed development:

- Planning Obligations (adopted October 2016);
- Open Space and Greenspace (adopted July 2017);
- Biodiversity and Geodiversity (adopted May 2018);
- Parking Standards (adopted October 2016); and
- Design (adopted July 2017).

## 7.0 Appraisal

### Overview

- 7.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Local Development Plan.
- 7.2 The key material considerations of relevance in the determination of the application are as follows:
- Principle of development;
  - Sustainability;
  - Impact on character and appearance of the surrounding area;
  - Neighbouring residential amenity;
  - Transport, highways & access;
  - Parking;
  - Flood risk & drainage;
  - Ecology & biodiversity;
  - Landscaping & Trees; and
  - Land stability

### The Principle of Development

- 7.3 The application site is situated within the settlement boundary and is not allocated for a specific purpose within the adopted LDP. Indeed, the LDP Proposals Map confirms the application site comprises unallocated 'white land', where a development of this nature at this location should be considered acceptable in principle.
- 7.4 Policy SC1, which relates to Settlement Limits, states that development within settlement boundaries are acceptable in principle providing that they are *"...proportionate in scale and form the role and function of the settlement as set out in the Settlement Hierarchy"*.
- 7.5 PPW 11 states the importance of providing educational facilities within communities as it is *"crucial for economic, social and environmental sustainability"*. Further to this, PPW emphasises that planning authorities must ensure that communities have access to a wide range of facilities. The scheme provides a new childcare facility in close proximity to both Ysgol Gynradd Gymraeg Blaendulais and Blaendulais Primary School, and also Seven Sisters Community Hall. As such, its proximity to other local facilities would provide social and economic benefits to the area.

- 7.6 In summary, a robust principle of development for the proposed childcare use has been established at the subject site, in accordance with Policy SC 1 & SP 6 of the LDP.

**Sustainability**

- 7.7 The application site occupies an inherently sustainable and accessible location; within walking distance of a range of services and facilities such as a corner shop, two primary schools, and Seven Sisters Community Hall.
- 7.8 The application site is well served by public transport, with bus routes linking Seven Sisters to Coelbren to the northeast and Neath to the southwest. The nearest train station is located 15km to the southwest of the site in Neath, and provides access to destinations further afield such as Swansea to the southwest and Cardiff to the southeast. Furthermore, in terms of active travel, a footpath adjoins the northern boundary of the site, and travels to the north through a forest.
- 7.9 In addition to the site's highly sustainable location, the development site is a previously developed parcel of land i.e., brownfield land. The proposed development will therefore ensure an underutilised, brownfield site is brought back into beneficial use for the local community of Seven Sisters.
- 7.10 To summarise, it is considered that the proposed development is in accordance with LDP Policies SP3 (Sustainable Communities) and SC1 (Settlement Limits), in addition to national planning policy.

**Impact on character and appearance of the surrounding area**

- 7.11 The proposed development will comprise of a single storey building, which responds well to the established character of the area as the surrounding properties along High Street are a mixture of bungalow and two-storey properties in scale.
- 7.12 The design of the proposed building and its respective palette of materials is considered contemporary in nature, adopting a design which is appropriate with reference to the site's surroundings, whilst also providing a betterment to the area in visual terms.
- 7.13 The proposal seeks to retain existing landscape where possible, and offset any loss of greenery elsewhere at the site. Landscape features are proposed in the form of wildflower areas and the plantation of species rich grassland.
- 7.14 The proposed design and landscape mitigation is considered to have a positive impact on the character and appearance of the surrounding

area; indeed, the proposed building presents an uplift in the visual quality of the built environment in this area of Seven Sisters.

- 7.15 In light of the above, it is considered that the proposals fully accord with paragraphs 3.3-3.18 of PPW 11, The Well-being and Future Generations (Wales) Act 2015, and Policy BE1 (Design) of the LDP.

#### **Neighbouring residential amenity**

- 7.16 The proposed childcare facility is proposed to be located within the southern section of the site, with landscaping features being incorporated along its eastern, southern, and western boundaries.
- 7.17 It is acknowledged that the childcare facility will result in a new built form adjacent to existing residential properties situated along High Street; the proposed relationship however is considered to be acceptable – with suitable separation distances to ensure that privacy and residential amenity remain maintained. Such childcare facilities are commonly located in residential areas, therefore the relationship proposed is considered to be acceptable from an amenity perspective.
- 7.18 The proposals are considered to safeguard existing public and residential amenity, particularly with regards to privacy, overlooking, security, noise and disturbance, thus the scheme complies with PPW Section 3, TAN12 (Design), The Well-being of Future Generations (Wales) Act 2015, and Policy BE1 (Design) of the LDP.

#### **Transport, highways & access**

- 7.19 The proposed development will formalize the existing vehicular entrance point at the site's western boundary. Access and egress are taken via High Street, which is a two-way, single carriageway residential road. The internal access route leads south past the proposed childcare centre to a car parking area and turning area. The informal parking area in the north of the site will be retained as existing.
- 7.20 High Street is subject to a speed limit of 30mph, and pedestrian footways and street lights are present within the vicinity of the application site. Given the modest scale of the proposals, it is considered that the proposed development of a childcare facility will not result in a significant increase of vehicles using High Street.
- 7.21 Pedestrian accessibility is of a very high standard at the site. The site benefits from existing pedestrian infrastructure along High Street and the surrounding area, along with well-lit streets to provide safe spaces designated for pedestrians. A new accessible ramp is to be provided in the west of the site, linking the proposed development with High Street, allowing convenient and safe pedestrian access.

7.22 Refuse and recycling has also been taken into consideration within the proposed layout. Bin collection points are located adjacent to the site's north western elevation.

7.23 It is therefore considered that the proposal is considered to be acceptable in terms of its accessibility, highway/pedestrian safety and transport implications. On this basis the proposed scheme complies with Policy SP20 (Transport Network) and TR2 (Design and Access of New Development).

#### **Parking**

7.24 In respect of car parking provision, due consideration has been made to the CSS Wales Parking Standards (2014). The Parking Standards indicates that for day nurseries and creches within Zones 2-6, one commercial space is required along with one space per 2 full-time staff.

7.25 Whilst staffing numbers for the childcare facility are unclear at this stage, it is envisaged the proposed parking provision is capable of accommodating the operational requirements of the scheme. As shown on the proposed site plan, a total of 11 parking spaces inclusive of 1no. accessible parking space has been provided on site. On this basis, it is considered the proposed development will comply with the adopted Parking Standards SPG.

#### **Flood Risk & Drainage**

7.26 A review of Natural Resources Wales' Development Advice Map reveals that the site lies within Flood Zone A. As such, is considered to be at little or no risk of fluvial or tidal/coastal flooding. In respect of surface water, NRW's Flood Map for Planning identifies that the central areas of the site, along with the western, northern, and eastern boundaries of the site lie within Flood Zones 2 and 3 in respect of surface water and small watercourse flooding.

7.27 To reduce the likelihood of surface water flooding at the site, the proposals will adhere to the Flood and Water Risk Management Act 2010 (Schedule 3), which requires all new developments of more than 1 dwelling house or where construction area is 100m<sup>2</sup> or greater to submit a Sustainable Drainage Systems (SuDS) application. This application will demonstrate the proposals' compliance with the statutory SuDS standards for the design, construction, operation and maintenance of surface water drainage systems.

7.28 It should be noted that the drainage strategy for foul and surface water will be developed in accordance with Schedule 3 of the Flood and Water Management Act 2010 and will therefore require a separate drainage consent from the council's SAB Authority.

- 7.29 In light of the above, it is considered that the proposed development at the site adheres TAN15 (Development and Flood Risk) and PPW 11.

#### **Ecology & biodiversity**

- 7.30 The planning application is accompanied by a Preliminary Ecological Appraisal, prepared by Ecological Services. The report recommends that bat and bird boxes are installed on the new building e.g., by being built into the fabric of the walls. Hedgehog nest boxes were also recommended to be placed within the band of trees near the railway line. As such, the above recommendations have been incorporated into the design of the site.
- 7.31 The report confirms the site comprises areas of semi-improved neutral grassland, semi-mature trees, scrub, tarmac, and gravel, and is surrounded by a network of roads, houses, shops, and a railway line.
- 7.32 The lack of buildings and structures on the site means that the site is unsuitable for roosting bats. The scattered trees within the site also demonstrate a similar pattern, as they have limited suitable features. The treeline located along the boundary of the railway line may have some suitability for roosting bats, however these are being retained as part of the development proposals. The site's suitability for foraging bats is limited due to the presence of street lamps along Commercial Street and High Street.
- 7.33 The band of trees adjacent to the railway line is also favourable as a habitat for nesting birds. As such, there is an opportunity to maintain and enhance habitats for nesting and foraging birds through habitat management and planting.
- 7.34 In light of the above, an appropriate landscaping and planting scheme are recommended at the site, along with the installation of bat, bird and hedgehog boxes.

#### **Landscaping & Trees**

- 7.35 A landscaping strategy has been prepared by Haire Landscape Consultants in support of the proposals which includes provision for an extensive scheme of new planting features to provide greenery, visual interest and biodiversity enhancement such as wildflower planting and tree planting.
- 7.36 Most trees are to be retained along the northwestern and southeastern boundaries of the site. Three trees are identified to be removed to facilitate the construction of the proposed development design. All trees identified for removal are low-quality, Category C trees. These trees should not present a constraint to developing the site.

**Land Stability**

- 7.37 The Coal Authority's Interactive Mapping System indicates the application site is located within the Coal Mining Reporting Area. Additionally, the application site may be located within the Development High Risk Area.
- 7.38 A Coal Mining Risk Assessment will form part of the Ground Investigation suite of documents currently being prepared on behalf of the applicant and will be submitted to the Local Planning Authority for consideration in due course.

## 8.0 Conclusion

8.1 This Planning Statement has been prepared on behalf of the applicant, N Richards, to accompany a full planning application for the development of a single storey childcare centre (Use Class D1), including access, parking, drainage, landscaping arrangements and all associated works at land to the east of High Street, Seven Sisters, Neath Port Talbot.

- A robust principle of development for the proposed childcare use has been established at the subject site, in accordance with policies SC 1 & SP 6 of the LDP.
- It is considered the proposed development benefits from extensive sustainability credentials, in accordance with both local and national planning policy.
- The proposals are considered to safeguard existing public and residential amenity, particularly with regard to privacy, overlooking, security, noise and disturbance, and as such comply with PPW section 3, TAN12, Well-being of Future Generations (Wales) Act, and Policy BE1 (Design) of the LDP.
- The proposed design and layout is considered to have a positive impact on the character and appearance of the surrounding area; indeed, the proposed building presents an uplift in built environment in the settlement of Seven Sisters.
- The proposal is considered to be acceptable in terms of access and movement, with a sustainable location and highway/pedestrian connectivity attributes that adhere to Policies SP20 (Transport Network) and TR2 (Design and Access of New Development).
- In addition to the key points addressed above, the scheme demonstrate compliance with all other material considerations including; highways & access, transport, flood risk, design, neighbouring amenity, ecology & biodiversity, parking, landscaping, ground stability and drainage.

8.2 To conclude, it is considered that the proposal fully accord with both national and local policies and there are no material planning considerations anticipated to prevent the planning application to be determined in accordance with the relevant planning policy framework. As such, it is respectfully requested that Neath Port Talbot County Borough Council consider this application favourably and grant planning permission for the proposal promptly and without delay.