

PLANNING STATEMENT
Gellinudd, Lon Catwg, SA8 3DX
March 2024

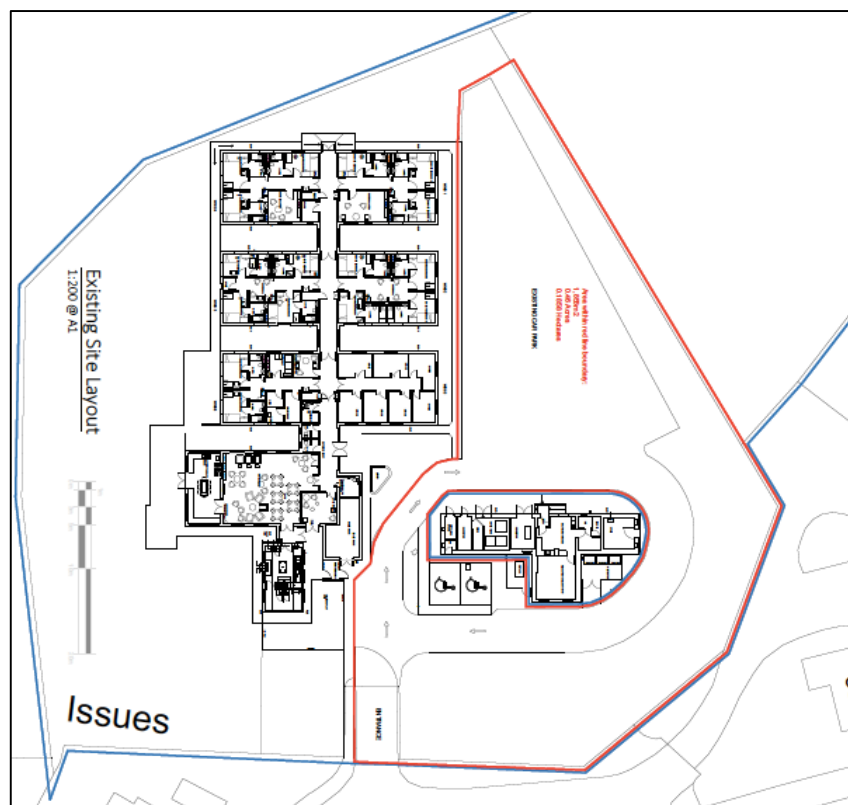
1.0 INTRODUCTION

- 1.1 This Planning Statement accompanies the full application prepared on behalf Rhodos Properties (No. 22) Limited for the construction of 4no. new single storey units (in a C2 use), relocation of the car park and associated works within the grounds of the former Gellinudd Hospital, Lon Catwg, SA8 3DX.
- 1.2 This document provides an overview of the planning case in favour of the proposals and is structured as follows:
- Section 2.0 - Site Description and Context
 - Section 3.0 - Planning History
 - Section 4.0 – Proposed Development
 - Section 5.0 – Pre-Application Advice
 - Section 6.0 - Planning Policy Framework
 - Section 7.0 - Planning Appraisal
 - Section 8.0 - Conclusion
- 1.3 The documents supporting the planning application include the following:
- Application Forms
 - Site Location Plan
 - Existing Site Plan (as is)
 - Existing Plan showing refurbished building
 - Proposed Site Plan and Floor Plans including Sections
 - Proposed Elevations
 - Green Infrastructure Statement
 - Tree Report
 - Tree Constraints Plan
 - Phase 1 Desk Study and Coal Mining Risk Assessment
- 1.4 A certificate of lawfulness for the proposed internal refurbishment of the main building and its continued C2 use was granted in January 2024 (ref: 2024/0002).

2.0 SITE DESCRIPTION AND CONTEXT

- 2.1 The application site measures 0.18ha and forms part of the wider former Gellinudd Hospital site which is located on the eastern outskirts of Pontardawe and comprises a self contained plot accommodating two buildings. The largest building was formerly used as a mental health recovery centre (C2 use), is one storey and positioned adjacent to the western boundary of the site. This building provides 16no. bedrooms and a series of communal spaces. The smaller building is also one storey and positioned to the south of the site and visible from Lon Catwg and was used in association with the main building housing the services for the site (gas meters, electrical switch board, waste storage, etc.) together with kitchen, break out room and toilet facilities.
- 2.2 The existing buildings are within a large plot which has a grassed area to the south, is surrounded by large, established trees (some of which subject to a TPO) and in the north eastern portion of the site is an area of hard standing which is in use as a car park and a grassed area to the front of the site, adjacent to the site access. For the purposes of this application, the site includes the existing car parking area, the grassed area to the front of the site and access point.
- 2.3 In terms of the site's context, it is located in a primarily residential area with dwellings located to the east and south, along Lon Catwg. To the north, north east and west is woodland that extends to Graig Gellinudd to the north.
- 2.4 Access to the Site is gained via Lon Catwg which in turn is accessed from Ashwood Drive and Cwm Nant-Llwyd Road via Graig Road.
- 2.5 No public rights of way cross the Site or run along its boundaries. There are public rights of way through the woodland area surrounding the Site. The Site is not affected by flooding. There are no listed buildings in the vicinity of the site.

Figure 1: Site location plan showing location of proposed dwellings



3.0 PLANNING HISTORY

3.1 In terms of planning applications, the historic applications (available on the Council website) are listed below:

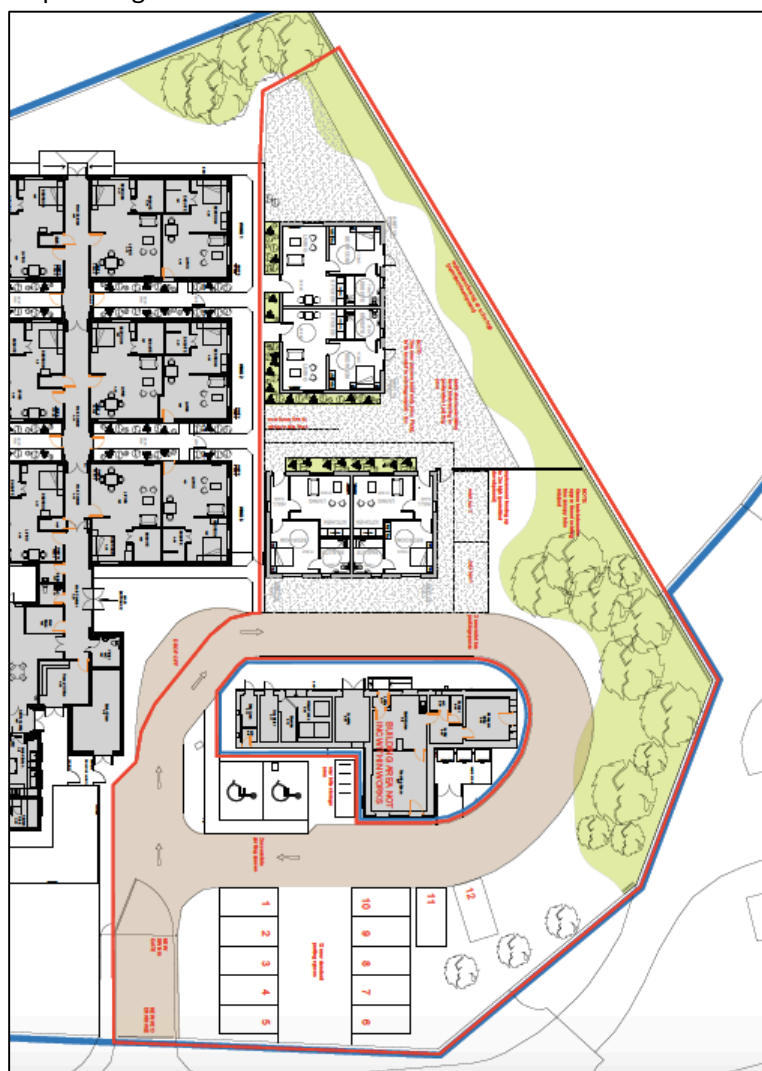
- P2024/0002 – Certificate of Lawful Development (proposed) internal refurbishment of existing mental health facilities (use class C2) to provide a care home (use class C2) - granted
- P2016/0195 - External alterations including new entrance lobby, projecting bay windows, blocking up existing windows and installation of a new doorway. Removal of existing car park (21 spaces) and installation of astro-turf pitch plus construction of 21 space car park- Granted
- P2013/1031 - [Certificate of lawful development \(proposed use\) for change of use from hospital \(Class C2\) to recovery centre for mental health patients \(Class C2\), ancillary training and administration facilities](#) – Granted
- P2000/0091 - [Extension off existing hospital day room for physiotherapy treatment area-](#) Granted
- L1976/0002 – Upgrading Sluices – Granted

3.2 The planning history confirms the site has a C2 use and that a number of alterations to the building have been consented and implemented at the site in the last two decades.

4.0 PROPOSED DEVELOPMENT

- 4.1 The proposals subject to this application form part of a wider re-use of the former Gellinudd Hospital site for as a specialist residential care home within the C2 use class. The existing buildings have been subject to a recent certificate of lawful development (for a proposed use) to confirm the lawfulness of the internal refurbishment of the existing mental health facilities (use class C2) to provide a care home (use class C2) that was granted in 2024 (ref: P2024/0002) and detailed above under 'Planning History'. The internal refurbishment subject to the certificate seeks to reduce the number of existing beds in the main building from 16 beds to 12 beds and this is shown in the plans submitted with application 2024/0002 which are contained in Appendix 1 of this letter.
- 4.2 This application seeks full planning permission for 4no. new single storey units and to relocate the car park and associated works. The units will be a step down care provision which will be used in associated with the care provision provided in the main building. The use class of the units would be C2 and offer a more flexible care provision than the main building whereby the level of care can be reduced to supports residents if their care needs change whilst at the facility. The units will form part of the planning unit of the main care home and will be located on the car park area in the north eastern portion of the site. The car park will be relocated to the front of the site on an area of maintained grass. The proposals are shown on the Proposed Site Plan extract shown in Figure 2 overleaf.

Figure 2: Extract of Proposed Site Layout



5.0 PRE-APPLICATION ADVICE

- 5.1 A pre-application enquiry was submitted on the 30th October 2023 and a written response was received on 21st December 2023. In summary, the written response confirmed that the principle of development of the proposed 4no. units and relocated car park was acceptable subject to material planning considerations. The main considerations identified in the written response were:
- Design and Visual Impact
 - Residential Amenity
 - Trees
 - Highways and Drainage
 - Biodiversity
 - Sustainable Drainage
- 5.2 The written response also confirmed the following supporting documents are required to be submitted with any future application alongside the planning application forms, plans and application fee:
- Tree Survey
 - Contaminated Land Desk-top Assessment
 - Coal Mining Risk Assessment
 - Green Infrastructure statement including Biodiversity Enhancements
- 5.3 A further telephone call to the planning officer took place on the 19th January 2024 which reaffirmed the LPA's acceptance of the principle of the proposed development, as stated in the written response. As well as a further discussion in relation to the proposed layout and density which was broadly positive subject to the material considerations raised in the written response being addressed.

6.0 PLANNING POLICY

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the development plan unless material considerations indicate otherwise. At national level the relevant policy is Future Wales, Planning Policy Wales and supporting Technical Advice Notes. The statutory local development plan for this Site is the Neath Port Talbot Local Development Plan 2011- 2026 (hereafter referred to as the LDP) which was adopted in 2016.

National Planning Policy

Future Wales: The National Plan 2040

- 6.2 The National Plan for Wales (hereafter referred to as Future Wales) was formally adopted by Welsh government in February 2021 and it outlines Welsh Government's strategies to address national priorities through land use planning, including sustaining and developing a vibrant economy, delivering growth in the right areas, achieving decarbonisation and climate resilience, developing strong ecosystems and improving the health and well-being of communities. The relevant aspects of Future Wales to this Site and its development are:

- **Policy 1: Where will Wales Grow** identifies a series of National and Regional Growth Areas within which new development is generally to be focussed. One of these National Growth Areas is the Swansea Bay and Llanelli urban cluster which includes Neath and the whole of the development site.
- **Policy 2: Shaping Urban Growth and Regeneration** states that 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.
- **Policy 9: Resilient Ecological Networks and Green Infrastructure** seeks to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure. This should be achieved by identifying areas to be safeguarded, opportunities for the maximising the value of existing green infrastructure and introducing new green infrastructure. Where possible, existing designated or high value sites should be connected through green infrastructure improvements.
- **Policy 11: National Connectivity** sets out the aspiration of the Welsh Government to support and invest in improving national connectivity. The priorities are to encourage longer-distance trips to be made by public transport, while also making longer journeys possible by electric vehicles.
- **Policy 12: Regional Connectivity** encourages a modal shift away from the private car by incorporating measures that encourage active travel and the use of public transport.
- **Policy 17: Renewable and Low Carbon Energy and Associated Infrastructure** this policy strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet the future needs of Wales.

- **Policy 28: National Growth Area – Swansea Bay and Llanelli** this policy provides more information about aspirations for growth within this newly designated National Growth Area. The policy reaffirms that Neath is included within the National Growth Area.

Planning Policy Wales, Edition 12

- 6.3 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 and the Well-being of Future Generations (Wales) Act 2015. The key planning principles are set out in this document are, amongst other things:
- A plan-led approach is the most effective way to secure sustainable development through the planning system, i.e. decisions should be made in accordance with Local Development Plans
 - Making the best use of resources
 - Creating and sustaining communities
 - Maximising environment protection and limiting environment impact
 - Consideration of the Transport Hierarchy

Technical Advice Notes

- 6.4 Technical Advice Notes (hereafter referred to as TANs) should be considered by local planning authorities when they are preparing development plans and should be read along with the Planning Policy Wales document which sets out land use planning policies in Wales. The relevant TANs are:
- TAN 5: Nature Conservation and Planning (2009)
 - TAN 11: Noise (1997)
 - TAN 12: Design (2016)
 - TAN 16: Transport (2007)
 - TAN 24: Historic Environment (2017)

Neath Port Talbot Local Development Plan, 2011-2026

- 6.5 The Neath Port Talbot Local Development Plan (hereafter referred to as the LDP) covers the period from 2011 to 2016 and was adopted in 2016. The LDP sets out the targeted future growth of the NPT administrative area and the vision, objectives and strategies to realise the growth identified.
- 6.6 On the LDP Proposals Map the Site lies in settlement of Gellinudd, please see Figure 3 overleaf which contains an extract of LDP Proposals.



Figure 3: Local Development Proposals Map Extract

6.7 The LDP policies which are relevant to this planning appraisal are listed below:

- Policy SP1: Climate Change
- Policy SP2: Health
- Policy SP3: Sustainable Communities
- Policy SP4: Infrastructure
- Policy SP15: Biodiversity and Geodiversity
- Policy SP16: Environmental Protection
- Policy EN8: Pollution and Land Stability
- Policy SP20: Transport Network
- Policy TR1: Transport Proposals
- Policy TR2: Design and Access of New Development
- Policy SP21: Built Environment and Historic Environment
- Policy SP10: Open Space
- Policy BE1: Design
- Policy SP18: Renewable/Low Carbon Energy
- Policy SP19: Waste Management
- Policy W3: Waste Management in New Developments

Supplementary Planning Guidance

6.8 Supplementary Planning Guidance provide additional guidance and detail to supplement the policies contained within the LDP policies. The relevant Supplementary Planning Guidance documents to the proposed development at the Site are:

- Planning Obligations (2019)
- Affordable Housing (2016)
- Landscape and Seascape (2018)
- Open Space & Green Space (2017)
- Biodiversity & Geodiversity (2018)
- Pollution (2016)

- Renewable & Low Carbon Energy (2017)
- Parking Standards (2016)
- Design (2018)
- Schedule of Buildings of Local Importance (2019)
- Development & the Welsh Language (2017)

Other Relevant Legislation

Well-being of Future Generations (Wales) Act 2015

- 6.9 The Well-being of Future Generations Act places a duty on public bodies to carry out sustainable development. The Act requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural.

Flood and Water Management Act 2010

- 6.10 Flood and Water Management Act 2010 (FWMA) requires surface water drainage for new developments which are over 100m² to comply with mandatory National Standards for Sustainable Drainage and developments obtain consent from the relevant require SuDS Approving Body (SAB).

7.0 PLANNING APPRAISAL

- 7.1 This section will consider the acceptability of proposals against the relevant planning policies.

Principle of Development

- 7.2 The proposal site is located entirely within the settlement boundary as defined in the Adopted NPT LDP and therefore the principle is in favour of development in accordance with Policy SC1.

- 7.3 The proposed C2 use of the units aligns with the site's current C2 use and, therefore, is an appropriate form of development for the Site and the proposed car park relocation is re-providing an existing facility on site. The principle of the development is considered to be accepted.

Design and Visual Impact

- 7.4 In terms of appearance, the proposed units are single storey with a hipped roof and simple design to remain in keeping with the main building and semi-rural setting of the site. The proposed materials include rendered walls with some panel cladding, white UPVC windows and doors and concrete roof tiles which reflect the materials of the existing buildings. The car park will be relocated to the front of the Site. The existing site boundaries including the existing trees and stone walls will be maintained which will largely screen the car park limiting the visual impact of this aspect of the development.

- 7.5 In terms of visual impact, the proposed units are positioned in a self contained area of the Site which is not visible from public vantage points, therefore, the visual impact of the proposals is likely to be negligible. Furthermore, the Site's natural boundaries will be maintained ensuring the natural semi-rural character of the site is maintained. As mentioned above, the car park will also remain screened from outside views.

- 7.6 The proposed development's design is acceptable and in keeping with its setting and the visual impact is minimal by virtue of the application site's self contained nature. The proposals accord with the requirements of Policy BE1 of the Local Development Plan.

Residential Amenity

- 7.7 The proposed units have been sited and designed to ensure they do not result in a detrimental impact on existing nearby properties by virtue of any unacceptable overshadowing, overbearing or overlooking impact. The units are limited to one storey and are at least 21m from neighbouring properties which is accepted as a satisfactory distance to ensure no adverse impact on neighbour amenity.

- 7.8 The units are positioned to prevent any adverse overlooking in relation to the existing buildings on site and the new units themselves and this is clear from the proposed site plans, shown in Figure 2 above.

- 7.9 The proposed development accords with the requirements of of Policy BE1 of the Local Development Plan.

Trees

- 7.10 The trees surrounding the Site are understood to be subject to a Tree Preservation Order (TPO) and a Tree Survey has been undertaken which has informed a Tree Constraints Plan, both of which are submitted in support of the application. The Tree Constraints Plan has informed the proposed layout to ensure no high quality trees will be adversely affected by the proposed development and the majority of the trees on site, which are located around the peripheries, will be retained.
- 7.11 Minimal tree loss is required to facilitate the relocated car park and is limited to the removal of four category C trees and one group of category C trees. These are low quality trees which, by virtue of their categorisation, do not represent a constraint to development. Also, they do not form part of the woodland edge and are scattered trees within the site limited and not integrally linked to the woodland area to the east. It is intended, as set out in the Green Infrastructure Statement, that a comprehensive landscaping plan will support the proposals which can accommodate the necessary compensation planting required and there is ample space across the applicant's landownership to accommodate this. The comprehensive landscaping plan can be subject to planning condition.

Ecology

- 7.12 The site has no ecological designation and it is proposed to develop upon an existing area of hard standing and area of maintained grass which have minimal value in ecological terms and, therefore, limited impact on the natural environment. It is acknowledged the trees surrounding the site are subject to a TPO and are mature but, aside from the removal of low quality scattered trees within the site limits, it is not intended to disturb the boundary trees adjacent to the wider woodland. Also light spill into the wooded area will be prevented so any ecological value of the surrounding trees will be unaffected and an external lighting plan can be secured via planning condition.
- 7.13 The proposals include biodiversity enhancements in the form of bat boxes, bird boxes and a comprehensive landscaping plan which are detailed in the accompanying Green Infrastructure Statement.

Access and Car Parking

- 7.14 The current buildings on site include 16no. beds and this represents the planning fallback position in terms of access and parking. The redevelopment of the site will deliver a maximum of 16no. beds, therefore, will not intensify the use of the site from a parking perspective and will be provided as follows:
- The internal refurbishment of the main building to reduce the number of beds to 12 and these proposals were subject to a Certificate of Lawfulness (ref: 2024/0002) which has been positively determined and the plans area included in Appendix 1.
 - The proposed new units will contain 4no. beds

- 7.15 In terms of staff, the facility will require a maximum of 20no. staff, including up to 6 resident staff and 14no. non resident staff.

Access

- 7.16 The site is accessed off Lon Catwg (adopted highway) via the existing site access. This access is suitable to serve the existing use and, therefore, is deemed suitable to serve the proposed use which seeks to retain the same number of beds.

Car and Cycle Parking

- 7.17 According to the pre-application response received, the Highways Authority confirmed that *'the existing building parking provision will be considered under the residential care home and the new 4 single storey units under self-contained elderly persons dwellings (not wardened) in the SPG Parking Guidelines.'* On that basis the following parking provision is required:

Existing Building:

- Resident Staff (RS) – 1 space per RS – 6no. spaces required
- Non-resident staff (NRS) – 1 space per 3 NRS – 4no. spaces required
- Visitor space – 1 space per 4no. beds – 3 spaces required

Proposed units:

- Residents - 1 space per 2-4 units – maximum of 2 spaces required
- Visitor - 1 space per 4 units – 1 space required

- **Total existing and proposed units parking requirement: maximum of 16no. spaces**

- 7.18 The proposed development provides a total of 16no parking spaces and one cycle stand which accords with the Adopted Car Parking Standards SPG and the advice given at pre-application stage.
- 7.19 The proposed access and parking requirements is in accordance with Policy TR2 and the relevant guidance.

Ground Conditions

- 7.20 As requested during the pre-application enquiry, the application is supported by a site investigation desk study and coal mining risk assessment which concludes that further intrusive site investigation is required to inform the final design with the following objectives:
- Identify the potential environmental liabilities at the site associated with any soil and groundwater contamination from past site uses, to substantiate and enhance the conceptual site model, for a residential with home grown produce scenario.
 - Provide a summary of the environmental conditions at the site, together with any necessary remediation works to render the site fit for its intended use.
 - Investigate the presence and depth of coal seams below the site and confirm the absence of workings to facilitate an intrusive coal mining risk assessment.
 - Provide recommendations regarding any relevant geotechnical aspects pertaining to the

development.

- Mine Gas Investigation and Risk Assessment

7.21 The intrusive ground investigation can be subject to a planning condition.

Sustainable Drainage

7.22 Schedule 3 of the Flood and Water Management Act 2010 (FWMA) requires surface water drainage for new developments which are over 100m² to comply with mandatory National Standards for Sustainable Drainage and developments obtain consent from the relevant require SuDS Approving Body (SAB). The statutory standards are now available and can be found here: <https://gov.wales/sites/default/files/publications/2019-06/statutory-national-standards-for-sustainable-drainage-systems.pdf>. The proposed development will require SAB approval and this consent will be sought at the appropriate time. There is ample space within the site limits to provide an acceptable SAB solution.

Other Matters

7.23 The following material considerations have also been considered and deemed likely to be acceptable in the context of the application:

- ***Flood Risk*** - The site is not located in Flood Zone B or C as defined in Technical Advice Note (TAN)15: Development and Flood Risk and is therefore not at risk of flooding. Furthermore, the site is not subject to surface water flooding based on the development advice maps contained in TAN15.
- ***Landscape Considerations*** - The site is not a designated green wedge, special landscape area (SLA), or a visually important local landscape (VILL). Furthermore, the site is well contained with landscaped, natural boundaries which offer screening to the Site.
- ***Heritage*** There are no listed buildings or other protected heritage assets on the site or within close proximity. The site is not located within or adjacent to a Conservation Area.
- ***Public Rights of Way*** – No public rights of way cross the site.

8.0 CONCLUSIONS

- 8.1 This Planning Statement supports the full application prepared on behalf Rhodos Properties (No. 22) Limited for the construction of 4no. new single storey units (in a C2 use), relocation of the car park and associated works within the grounds of the former Gellinudd Hospital, Lon Catwg, SA8 3DX.
- 8.2 It is considered the proposed development represents an acceptable scheme for the following reasons:
- The site is located within the settlement and, therefore, the principle of development is established.
 - The site is within an existing C2 use and so the proposed C2 use is appropriate.
 - The proposals will not have a harmful impact on surrounding neighbour amenity or the existing main building.
 - The site can acceptability be developed without an adverse impact on highways and provide the necessary parking provision required.
 - The proposed development will have a minimal impact on trees which can be mitigated for through a comprehensive landscape plan.
 - The proposed design is simple and in keeping with the existing buildings on site and semi-rural setting.
 - The ground conditions have been assessed and further intrusive works identified.
 - The units would not be at risk of flooding since they will remain flood free in a flood event and it is considered a safe access/egress can be achieved (subject to further consideration).
- 8.3 A certificate of lawfulness for the proposed internal refurbishment of the main building and its continued C2 use was granted in January 2024 (ref: 2024/0002).