

AH/240010/L0002a

17th July, 2024



By Planning Portal: **PP-13189010**

Neath Port Talbot County Borough Council,
Development Control Section,
The Quays, Brunel Way,
Neath.
SA11 2HZ

Dear Sir/Madam

Town & Country Planning Act 1990

**On behalf of Caredig: Planning Application for the Change of Use of 22 Victoria Gardens,
Neath from guest house to five residential apartments (Class C3)**

Please find enclosed a planning application for the above development.

The application comprises:

- This covering letter / statement
- Drawings (See attached schedule)
- Building Inspection (Protected Species) Report E24124401 / Doc 01, prepared by Soltys Brewster
- Flood Consequences Assessment 19766/01, prepared by Vale Consulting Engineers
- Green Infrastructure Statement and Context Plan 100 PL01, prepared by Soltys Brewster
- GI / Landscape strategy plan 400 PL01, prepared by Soltys Brewster (Appended to GI Statement)
- Transport Note 24-01008/TN/01, prepared by Corun Highway Engineering
- Coal Authority CMRA Exemptions List

The statutory fee of £2,300 (5 x £460) has been paid directly by the client.

Background

Caredig is an established private housing association providing new homes across Swansea and Neath. In 2023 it acquired 20, Victoria Gardens in the centre of Neath, which has permission for a change of use to provide new apartments. Caredig has now been presented with the opportunity to acquire the adjoining property at 22, Victoria Gardens and would like to convert it to provide 5 new apartments.

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The property comprises a large semi-detached building with external space to the west and vehicular access via a lane to the north.

The building comprises the existing three storey stone semi-detached dwelling which has been substantially extended with unsympathetic two storey and single storey additions to the rear. The curtilage is largely laid to tarmac and paving.

The site is outside the flood zone in the current DAM mapping. It falls within the Neath town centre Conservation Area, but is not listed.

The site has a limited recorded planning history. In June 2003 consent was granted to convert it from its former use as a nursing home (extension to Number 20) to a dwelling (P2003/0823) and in March 2005 permission was granted to change it from a dwelling to a guest house with managers accommodation (P2005/0355). We understand that this was implemented, but the guest house subsequently closed.

Also of note is that in December 2022 permission was granted in respect of the adjoining property at 20, Victoria Gardens for conversion of that property to six one-bed residential apartments (P2021/1178).

The approved internal configuration of the application property as a guest house is shown on BBA drawing 940/F/02 and provided 8 guest bedrooms with a manager flat on the second floor.

The building is set in a generous curtilage, with vehicular access taken via a lane to the east which connects to Glyn-y-Coed Road. Pedestrian and cycle access is taken from the front of the property, from Victoria Gardens.

The guest house closed some years ago and the internals of the building are now in a poor condition and there is an urgent need for refurbishment. The curtilage of the property and its exterior are also in a poor condition and detract from the appearance of the Conservation Area.

Proposal

The proposed development comprises the internal reconfiguration of the building and the creation of five apartments, as follows:

Unit	Accommodation	Area
1	2B3P	86.0 sq m
2	1B2P	60.0 sq m
3	1B2P	57.0 sq m
4	1B2P	49.2 sq m
5	2P4B	50.2 sq m

These units will be provided as 100% affordable units, managed by Caredig as a Registered Social landlord. They are designed to meet WDQR Standards.

Externally, the curtilage will be re-landscaped. Open enclosures will be provided for bike storage and recycling, and a dedicated area will also be provided for clothes drying. Unit 1 will

benefit from its own enclosed, private garden area. Two parking spaces are proposed, taking direct access from the lane.

The alterations to the existing building are very limited. A services riser measuring 1800mmx 950mm (GEA) will be constructed on the external wall of the northern elevation. An existing dormer in the northern pitch of the roof will be removed and replaced with a larger rooflight window. There will also be window replacements and changes to the windows and the introduction of a door on the eastern elevation to give direct garden access. There are no changes to the façade of the building facing the square. A dormer will be added to the southern roof pitch at the rear of the building, but this will not be glazed.

The garden will be landscaped, with new hedging and open grass areas.

Pre-application advice

On 8th May 2024 Caredig secured pre-application advice from the Council on the change of use proposal. This confirmed the intended use to be acceptable in principle and advised on the scope of material required to support the application.

Planning considerations

In consideration of the proposal and the pre-application advice received, the key issues in respect of the application are likely to concern the following.

Principle of development

As acknowledged in the pre-application advice, the property falls within the urban area of Neath in a location that is highly accessible and where new residential accommodation and particularly social housing, is supported by Policies OB10 and AH1 of the adopted LDP.

Affordable housing

The proposed development will deliver 5 affordable homes to meet local needs. This accords with the requirement of Policy AH1 of the adopted LDP.

Flood risk

The application site falls outside of the flood plain as defined by the DAM mapping and accordingly the proposal is compliant with flooding policy. In pre-application advice the Council highlighted the potential changes to NRW mapping and in response to this we have instructed Vale Consulting Engineers to prepare a Flood Statement, which is enclosed. This confirms that the proposal raises no concerns in flood risk terms.

Highways and access

The application site is centrally located within the urban area of Neath and is genuinely accessible by a variety of non-car transport modes. The enclosed Transport Statement prepared by Corun Highways Engineering demonstrates compliance with the Council and Welsh Government's requirements for active travel and non-car access. It also demonstrates

that the parking provision provided for cycles exceeds the requirements of the adopted SPG. Parking for vehicles is within the maximum levels set by the adopted SPG and is shown to be appropriate to meet the requirements for social-rented housing.

Ecology

In response to pre-application advice and the requirements of LDP Policies ENV6 and ENV7, Soltys Brewster has been instructed to undertake an ecological survey of the building and site. This has identified no species of note. The risk of bats being accommodated within the building is low. Per the report's recommendations a further emergence survey has been scheduled in the next couple of weeks and will follow this application. The report also includes consideration of the net benefit for biodiversity in accord with the Step Wise approach.

Green Infrastructure

In accord with Chapter 6 of PPW12, the application is supported by a Green Infrastructure Statement and GI/ Landscape Plan prepared by Soltys Brewster that delivers an enhancement of the site's landscaping.

Coal mining

The site appears to sit in a High Risk Development Area for coal mining. In such locations there is ordinarily a requirement for applications to be supported by a Coal Mining Risk Assessment ("CMRA"), unless it meets one of two categories of exemption.

Part B, entitled "Exempt by nature of development", excludes development that is unlikely to require deep and extensive foundations or groundworks. The Guidance gives examples of such exceptions as change of use applications, means of enclosure, minor development not creating floorspace and non-permanent structures. The exemption list is attached for your reference.

In the case of the application proposal there is no new floorspace proposed. The only ground works relate to the erection of enclosures for the recycling and bins and the washing area and an enclosure for a services riser. These fall squarely within the Part B exemption. Consequently, no CMRA is required in this case.

Open Space

Pre-application advice identifies that, per LDP Policies SP10 and OS1, Section 106 contributions may be required towards the provision of open space where local provision is considered deficient. The application site is located immediately adjacent to Victoria Gardens which provides a high-quality area of public open space for new residents of the proposed accommodation. It is also 300 metres walking distance from rugby and cricket grounds at The Gnoll to the north and 350 metres walking distance from The Gnoll Country Park. The site is therefore well served by existing provision of a variety of typologies of open space.

Conclusions

In consideration of the above, it is considered that the proposed development for five affordable units within this central location is compliant with the development plan and permission should be granted.

We trust that the enclosed submission is complete. Should you require any further information please do not hesitate to contact me.

Kind regards

Yours faithfully



Arfon Hughes
Director

cc.	S Griffiths	Caredig
	M Batcup	BBA Architects