



AH/240057/L0002

24th September 2024

By Planning Portal:

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: Installation of Proposed External Wall Insulation (EWI), Solar Panels, Battery Storage & ASHPs and associated external changes at 1-12 Traherne Court, Neath Abbey

Please find enclosed a planning application for the above development.

The application comprises:

- This covering letter / statement
- Drawings (See attached schedule)
- Specification details (See attached schedule)
- Flood note
- Green Infrastructure Statement

The application is limited to the external works outlined and creates no new floorspace. The requisite application fee has been paid directly by the applicant.

Background

1-12 Traherne Court comprises two adjoining apartment blocks owned and managed by Caredig Housing Association ("Caredig").

In 2019, The "Better Homes, Better Wales, Better World" report was commissioned by Welsh Ministers to examine how homes in Wales could be decarbonised. The recommendations were accepted by Ministers including a commitment to pursue a residential decarbonisation programme. In response to the recommendations, it was agreed that an 'Optimised Retrofitting' approach would be adopted in Wales.

From this commitment and approach the Optimised Retrofit Programme ("ORP") was established in 2020. Over the past three years a range of projects across the social housing

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sector have been supported and circa £190m of funding invested. The ORP 3 Year 3 phase of funding seeks to continue to build on this to ensure that all social landlords in Wales engage with ORP.

Caredig has committed to delivering the ORP across its housing stock. By April 2024 Caredig had installed approximately 1300 solar panels and battery storage. It has also committed to a programme of external wall insulation across its housing stock, including the application premises.

These measures assist in the decarbonisation of the housing stock but in reducing the energy bills of residents.

Proposal

This application proposes the external treatment of the existing buildings at 1-12 Traherne Court, together with associated external changes including the addition of external battery storage to serve the proposed solar panels on the building and air source heat pumps.

While such changes would be regarded as permitted development to residential dwelling houses, express permission is required for blocks of flats such as in this case.

The existing brick will be finished in a white render, while the hanging tile features below and between the windows will be replaced with an external ceramic tiling system.

The proposed MEGC 410W Solar PV and Solax battery system specifications and designs are provided with the application, along with the specifications of the Mitsubishi Ecodan ASHP units.

In terms of the cladding, this will comprise a 70 mm depth panel fixed to the existing brickwork. Coupled with improved cavity insulation and other measures to upgrade insulation and ventilation specifications, the proposed WBS system will result in a halving of heat demand to flats above ground, and a 23-33% reduction at a ground floor.

Between and below windows, an eco-glazed brick slip made of recycled Welsh slate will be used, in a brown colour.

No new floorspace is created by the proposal.

In accordance with Chapter 6 of PPW the proposal also includes measures to enhance the biodiversity at the application site through the provision of hedge planting in front of the ASHPs and inclusion of bat and bird boxes, as detailed in the Green Infrastructure Statement that accompanies the application.

Assessment

The development plan is wholly supportive of measures to improve the energy efficiency of new buildings.

Future Wales 2040 sets as a key outcome the delivery of a sustainable, decarbonised society. This is reflected in Paragraph 5.3.91 of the LDP which notes that “In order to reduce the overall

need to generate electricity, energy conservation and efficiency measures will be encouraged in all new development.”

Policy BE1 Design expects new development to demonstrate a high quality of design, particularly in respect of the context of the site, the use of materials and the impact on the amenity of residents. It also highlights at Criterion 8 that development should use resources including land and energy as efficiently as possible.

The proposed development will support the key energy efficiency objectives in a manner while also enhancing the external appearance of the existing buildings, to the benefit of the amenity of existing residents and the locality.

The curtilage of the property falls outside of any defined flood zone within the current TAN15. The enclosed flood note explains that while the Flood Map for Planning does extend further into the site, this does not impact the buildings and the proposal has no implications for flood risk at the site or elsewhere.

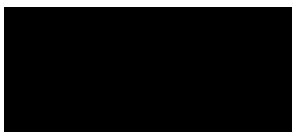
At the request of officers, the noise impacts of the ASHPs has been assessed and a Noise Impact Assessment is provided.

As outlined above, the proposed development will meet the requirement for biodiversity enhancement through the provision of hedging and bird and bat boxes. A brief Green Infrastructure Statement is also supplied outlining that the proposal accords with the Stepwise approach.

Conclusions

We trust that the enclosed is complete and will allow for the timely determination of this planning application. Should you require any further information please do not hesitate to contact me.

Kind regards



Arfon Hughes
Director

cc. J Lane Caredig