



7th October 2024

Claire Hall
NPT CBC

By Email

Dear Claire

**P2024/0301: AFFORDABLE APARTMENT DEVELOPMENT
CAEWERN HOUSE, DWR-Y-FELIN ROAD, NEATH SA10 7RH**

I refer to the above application and, in particular, to the recently submitted amended plans and documents which respond to matters raised during the application process and at our site walkover of 24th July.

The impact of the proposed development on the amenity of existing residents in the vicinity of the site has been a key consideration throughout the design development process. Nonetheless, during the site walkover the focus of much of the discussion was on the interrelationship between Block 1 and the existing residential properties on Twyn Teg.. The amended plans respond to these discussions, and there follows a detailed assessment of this relationship.

Daylight/Sunlight

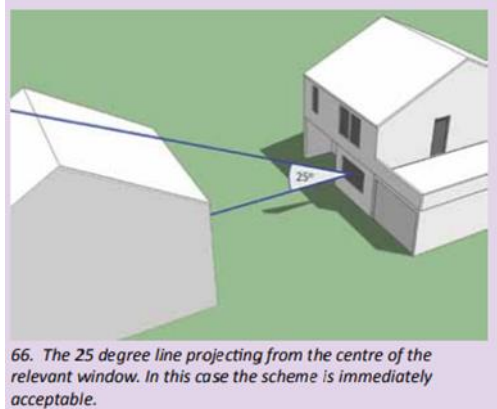
The BRE publication *Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice* provides a series of techniques for assessing the extent to which any development provides adequate daylight and sunlight to daytime habitable rooms for future occupiers and neighbouring buildings.

With regard to affected rooms the guidance states:

This guidance applies to habitable rooms which, according to the layout plan, are the main daytime living spaces of the scheme. Assessments will not relate to toilets, bathrooms, circulation spaces, storerooms, galley kitchens or similar spaces. Rooms containing beds will only be included in an assessment if they form part of the daytime living space. Rooms containing more than one effective source of light, such as windows on other facades, light wells or tubes will not be included in any assessment.

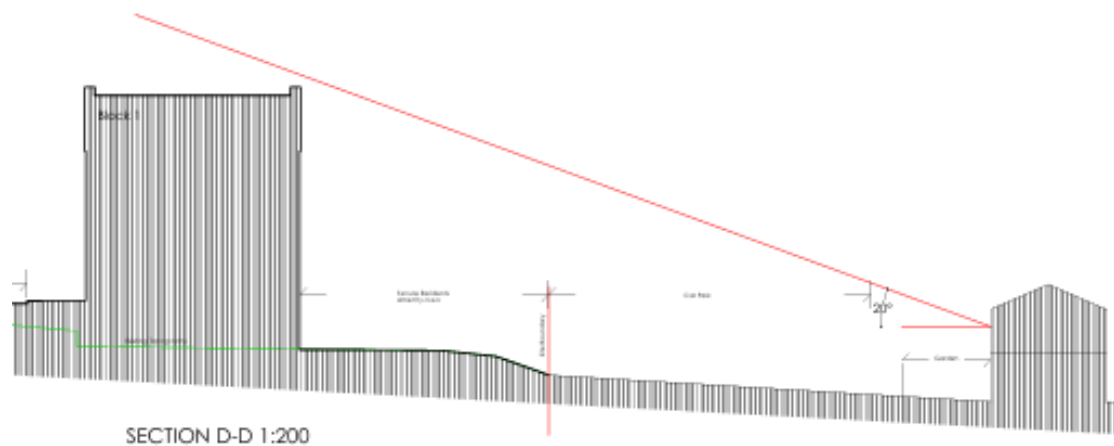
The 25 Degree Rule relates to windows facing other buildings or relevant structures. It identifies that *"a significant building or structure will be obstructing reasonable light to a relevant window if it breaks a line projecting up from the centre of the relevant window 25 degrees from the horizontal (66)."*

Fig.1: Application of the 25 degree rule (Site Layout Planning for Daylight and Sunlight)



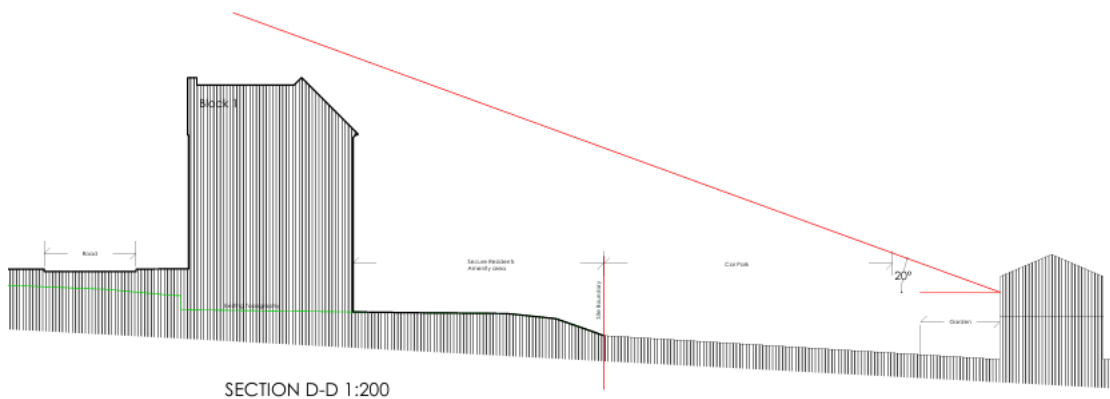
The proposed development has always more than complied with this standard, as evidenced in the site section plans which accompanied the original application (See Fig.2 below) which show the interrelationship between Block 1 and the existing residential properties on Twyn Teg.

Fig.2: Previous Block 1 Section



The latest amendments to Block 1 include adjustments to the block's size and design, including amendments to the roof form to minimise its massing to Twyn Teg to the east (see Fig.3 below). As identified above the BRE best practice guidance stipulate that an obstruction of reasonable light would occur when a building breaks a 25 degree line from the horizontal. In this case, Block 1 would be less than 20 degrees and so there would be no adverse impact on existing residents as a result of loss of daylight/sunlight.

Fig.3: Amended Block 1 Section



Overlooking

NPT do not have any adopted guidance on privacy distances for new build development. Appendix B to the Council's SPG on Design however includes guidance on privacy distances for residential extensions. This identifies a minimum privacy distance of 21 metres between habitable room windows, which is aligned with generally accepted best-practice. Where there are level changes between opposing windows the SPG advocates an increase in separation distances between habitable room windows of 2m for every 1m of elevation variation.

Block 1 would be some 40 metres from the rear façade of the nearest property on Twyn Teg, and circa 35m from the garden boundary, well in excess of minimum privacy distances. Whilst there would be a variation in window heights between Block 1 and the properties on Twyn Teg, the significant off-set between the Twyn Teg properties and Block 1 would more than compensate for this. Furthermore, there is significant existing tree cover within the site between the proposed block and existing residents which would not only be retained, but bolstered with additional tree and landscape planting as part of the development proposals (see Figs 4 and 5 below).

Fig.4: Existing tree and landscape planting on eastern site boundary.

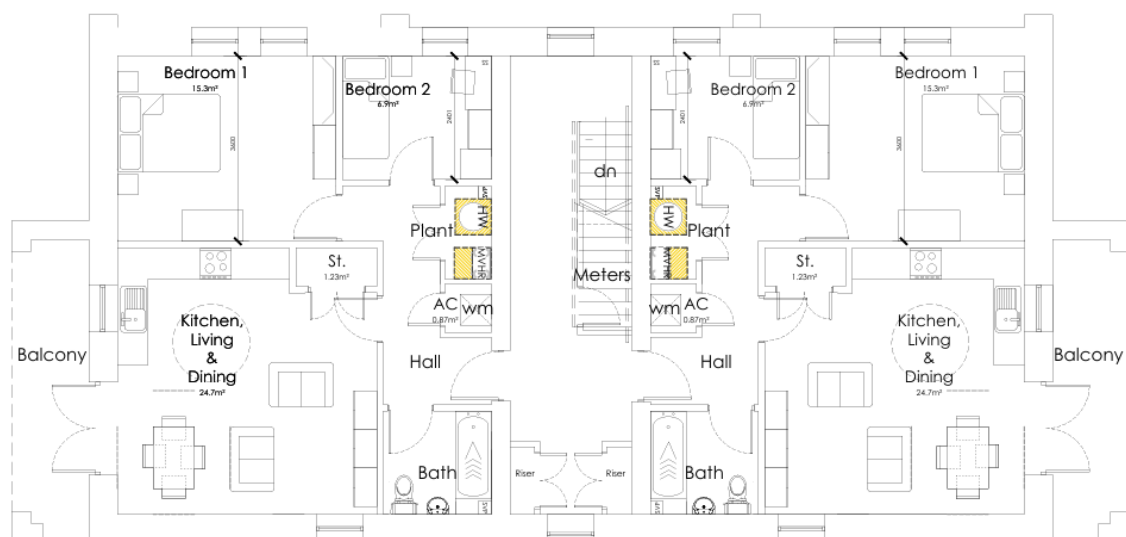


Fig.5: Retained and proposed tree and landscape planting along eastern boundary (Tir Landscape Strategy)



Notwithstanding this, Block 1 has been comprehensively redesigned to relocate habitable rooms and associated balconies to the front and side of the block. As a result the only windows on the eastern (rear elevation) are secondary windows/windows serving non-habitable rooms.

Fig.6: Revised floorplans for Block 1



BUILDING TYPE A: FIRST FLOOR PLAN

Having regard to all the above considerations it is concluded that there would be no unacceptable impact on the amenity of existing residents as a result of overlooking, and nor could there be any reasonable perception of overlooking.

Overbearing Impact

NPT do not have any published guidance on overbearing impact in respect of new build development. Appendix B to the Council's SPG on Design however provides guidance on how to avoid an overbearing impact in respect of residential extensions. This recommends an off-set distance of 12 metres between habitable room windows and blank facades in order to avoid an overbearing impact (see Fig.7 below).

Fig.7: Extract from NPT's Design SPG



Whilst, as a result of topography and design, Block 1 would appear roughly double the height of a traditional dwelling when viewed from the rear of the properties on Twyn Teg, it would be nearly four times the minimum off-set distance recommended within the SPG, which is more than sufficient to compensate for its larger mass. Furthermore, and as referenced above, the existing significant tree cover on the site's eastern boundary which would be bolstered with additional tree and landscape planting means that there would be very limited perception of Block 1 (or any of the new development) from Twyn Teg. It is concluded therefore that Block 1 would not have an overbearing impact on the existing residential properties along Twyn Teg.

Other Matters

The amended plans and documents address other matters raised during the application process including highways feedback and mitigation tree planting in accordance with PPW12.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Jon Wilks'.

Jon Wilks
Director