

PLANNING STATEMENT

Proposed Residential Annex

Bryn Celyn, Neath Road, Fforest Goch

October 2024



Summary

Proposal:

Proposed Residential Annex

Location:

Bryn Celyn, Neath Road, Fforest Goch, SA8 3JB

Date:

October 2024

Project Reference:

S24.105

Client:

Mr R. Weaver & Mrs H. Weaver

Product of:

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1.0 Executive Summary

- 1.1 This Planning Statement has been prepared by Asbri Planning on behalf of the applicant, Mr R. Weaver & Mrs H. Weaver, in support of a full planning application to be submitted to Neath Port Talbot County Borough Council for the proposed development of a residential annex at Bryn Celyn, Neath Road, Fforest Goch, SA8 3JB.
- 1.2 The applicant seeks to utilise the parcel of land adjacent to the house to erect a self-contained annex for their daughter who has severe anxiety, Obsessive-Compulsive Disorder (OCD) and Autistic Spectrum Disorder (ASD). She is unlikely to be able to live independently after completing college and the annex has been specifically designed to offer her a level of independence whilst ensuring the monitoring and support she requires.
- 1.3 The project has been subject to pre-application discussions under reference Q2022/0149. The pre-application response was in principal supportive of the proposed development subject to additional information being provided. The suggestion to build within the existing garden is unfeasible due to the risk of flooding (culvert running underneath garden that takes away significant runoff water from adjacent fields). Additionally, the highways constraints relating to the site require the proposal to be situated adjacent to the existing dwelling and driveway. Importantly, the siting of the proposed development allows for shared access but independent living spaces for the applicant and their daughter.
- 1.4 Subsequently, a planning application (ref P2024/0035) was submitted in January 2024 for the *“Change of use of field to domestic curtilage in order to facilitate the construction of a detached self-contained residential annex with domestic workshop and store, means of enclosure, together with turning area/courtyard all for use ancillary to no. 1 Neath Road Fforest Goch”*. The application was refused in May 2024, with the Decision Notice providing the following reasons for refusal:
1. *“The proposed development, by reason of its form, siting and scale, constitutes an unjustified, undesirable and inappropriate form of development outside any existing settlement boundary, within the open countryside and green wedge. The increase in associated domestic paraphernalia on the site, increased parking provision together with the proposed building itself would encroach into a currently undeveloped area and would result in the spread and intensification of domestic use that would be prejudicial to the rural*

character of the area and result in the unacceptable erosion of the open countryside as well as a harmful incursion into the green wedge, both of which should remain for the most part undisturbed. As such, the development would be contrary to established national and local planning policies and would set an undesirable precedent for further applications for similar development in this area, contrary to policies SC1, EN3 and BE1 of the Neath Port Talbot Local Development Plan and advice contained within Planning Policy Wales 12"

1.5 In response to the reason for refusal noted above, the applicant has since revised the proposals under this submission, to better reflect the context of the application site. Informal discussions were also undertaken with the Local Authority to understand the nuanced alterations that would contribute towards delivering an improved, compliant development proposal. Since the original proposal, the alterations have been based entirely on the direction and suggestions from the LPA. This has included moving the siting of the proposal outside of the large oak tree root protection zone, providing a connection between the existing dwelling and annex via a canopy. It was decided to propose a wall and flat roof to provide better architectural rhythm between the two structures and importantly improving the relationship and connectivity. A summary of the scheme alterations is set out below:

- The store room, workshop and associated parking area have been omitted. The removal of these elements has allowed for the annexe to be re-sited and re-orientated, to be positioned closely to the existing dwelling.
- As a result, the scale, form and massing of the development is greatly reduced, providing a structure which is easily identifiable as subservient to the main dwellinghouse. The reduced footprint is also seen as more complementary to the sensitive setting of the development. The outward extent of the annex is pushed back towards the existing dwelling, creating a less intrusive structure, that better corresponds with edge of settlement, residential character.
- The relationship between the proposed annex and existing dwelling is strengthened as a result of the re-siting and re-orientation. A connecting structure links the two buildings, creating visual continuity between the annex and dwelling.
- The proposal will see a very small increase to the existing car parking area/driveway, although this is enclosed by the proposed annex structure, creating a court yard form. Importantly, this improved driveway area will allow for vehicles to turn within the site, meaning vehicles will not have to reverse back into the carriageway, allowing egress in a forward gear –

providing a highways safety improvement upon the existing access arrangements.

- 1.6 In respect of planning policy, the LDP Proposals Map indicates the subject site is situated outside of the defined settlement boundary under Policy SC 1 and is therefore located in the 'countryside'. Furthermore, the application site is located in the designated Green Wedge. Given the speciality and niche purpose of the proposed development, the proposals are unlikely to fall in to a defined category within Policy SC 1. The proposal can demonstrate part compliance to the requirements of Policy SC 1 due to its siting adjacent to the existing dwelling and the proposed scale and form of development. It should be noted, an agricultural building has been erected to the north of the application site. The agricultural building is significantly larger than the proposed residential annex, as demonstrated in the accompanying drawing reference 060 Sk008. Like the proposed annex, the building is located within the countryside and the designated green wedge. It should also be noted a permanent outbuilding structure has been constructed at 2 Neath Road, opposite the development which, when considered alongside the agricultural building, causes the visual extent of the settlement to be extended.
- 1.7 In order to establish a principle of development, the particularities of the scheme and comments received as part of the pre-application advice point us towards considering the merits of the scheme against Policy EN 5 Conversion and Extension of Existing Buildings in the Countryside. This is particularly pertinent in consideration of the resubmission scheme, which has positioned the annex in closer proximity to the existing dwelling, and proposes a linking structure between the two buildings. In this regard, the revised scheme demonstrates a stronger relationship with the existing dwelling, lending weight to our view of the scheme as an extension of sorts.
- 1.8 The principles of the scheme adhere to Policy EN 5 Conversion and Extension of Existing Buildings in the Countryside – establishing a principle of development at the subject site. The pre-application advice indicates the planning considerations of the proposed development would be similar to that of extension rather than a standalone, new build development. We concur with this view, and the revised scheme seeks to enhance this aspect, creating an enhanced relationship between the two buildings. On this basis, the proposal can be characterized as a *“limited extension, alteration or replacement of existing dwellings”* and therefore does not represent inappropriate development, in accordance with PPW12 paragraph 3.75. It should be noted, the Development Management Manual states in relation to pre-application advice at paragraph 6.3.22:

- 1.9 *"It is important that pre-application advice provided by an LPA is consistent, as it will be used by applicants to inform their development proposals. Consistency, and the effectiveness of pre-application discussions, can be improved if LPAs ensure that suitably experienced officers conduct negotiations and provide advice. LPAs should also seek to provide continuity in officer involvement so that any related planning applications are dealt with by the same officer."*
- 1.10 The sensitivity of the design should also be considered in this regard. The proposals are highly sympathetic to the countryside setting. The single storey ridge height is significantly below the adjoining existing dwelling. Furthermore, the development is 'cut into' the level of the development site, reducing massing and scale so as to reduce visual impact. In summary, we believe the proposal will be of negligible impact upon the openness of the countryside and green wedge. Furthermore, the proposal has been sensitively designed to assimilate with the countryside setting. We consider a proposal of this scale does not represent the coalescence of settlements, nor would it inhibit the prevention of coalescence of settlements. Furthermore, the Ecological Appraisal confirms the inclusion of the report recommendations would result in a diverse habitat, far exceeding the current ecological value.
- 1.11 The applicant is happy for a planning condition to be attached to any future permission which links the proposed development with the dwellinghouse, in order to ensure the annex cannot be separately occupied.
- 1.12 Should the Local Planning Authority take the view that the proposal does represent 'inappropriate development' we wish to highlight the *"very exceptional circumstances where other considerations clearly outweigh the harm with such development would do to the Green Wedge"* as advocated within paragraph 3.74 of PPW12. Given that any harm to the Green Wedge would be minimal, (owing to the sensitive design and linkages to the existing dwelling house) we believe this proposal could be considered to fulfil the 'very exceptional circumstances' where the benefit of such a development would outweigh any such harm. PPW12 states at paragraph 3.6 *"Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments"*,
- 1.13 This statement highlights how PPW12 supports proposals which *"meet the needs and are accessible to all members of society"*. Additionally, PPW12 indicates housing supply should respond to the differing needs of communities and includes *"the housing requirements of older people and people with disabilities"*. The proposals respond to the distinct needs of the local community and will allow for a young person to live

semi-independently with the support of family, crucially allowing for a family unit to remain within their community. We believe significant weight should be attached to these considerations as the proposals are wholly 'people focussed' allowing a family to continue to enjoy their sense of community & familiarity within the community, which will significantly benefit well-being in the long term.

- 1.14 In addition to the key points addressed above, the scheme demonstrates compliance with all other material considerations including; design, highways & access, parking, trees, ecology & biodiversity. Furthermore, the proposals will provide a space for vehicles to enter and exit the site in a forward gear. This will greatly benefit highway safety levels at the site and will remove the need to reverse out of the current access on to a main road.
- 1.15 To conclude, we believe the proposals represent a policy compliant scheme when considered against the relevant local and national level planning policies. It has been demonstrated how the applicant is keen to positively and proactively work with the Local Planning Authority throughout the development process in order to identify a form of development which can be considered acceptable by all parties. This is thoroughly evidenced in the design response of the revised submission.
- 1.16 On this basis we politely request that the application be positively determined, and planning permission be granted without delay.

2 Introduction

2.0 This Planning Statement has been prepared by Asbri Planning on behalf of the applicant, Mr R. Weaver & Mrs H. Weaver, in support of a full planning application to be submitted to Neath Port Talbot County Borough Council for the proposed development of a residential annex at Bryn Celyn, Neath Road, Fforest Goch, SA8 3JB.

2.1 As part of this application, the following application plans/drawings are submitted:

Drawing Name	Prepared By
Site Location Plan – 060 1001D	Black Cat Architects
Existing & Proposed Site Plan 060 1101D	Black Cat Architects
Existing & Proposed Section AA 060 1102D	Black Cat Architects
Existing & Proposed Section BB 060 1103A	Black Cat Architects
Proposed Plans 060 2101C (inc. roof plan)	Black Cat Architects
Proposed E&S Elevations 060 2102C	Black Cat Architects
Proposed W&N Elevations 060 2103C	Black Cat Architects

2.2 The following supporting documents are submitted alongside the Planning Application:

Document Name	Prepared By
Design & Access Statement	Black Cat Architects
Green Infrastructure Statement	Black Cat Architects
Ecology Appraisal	Ecology Planning
Tree Report	RTAC
Pre-application Advice Ref: Q2022/0149	NPTCBC

2.3 The project has been subject to pre-application discussions under reference Q2022/0149. The pre-application response was in principal supportive of the proposed development subject to additional information being provided. A summary of recommendations from the pre-application are listed below.

Design

2.4 *“The contemporary nature of the proposal would likely be considered acceptable if an application were to be submitted. Noting the traditional Welsh stone face of the host dwelling, it would benefit the submission if an element of the proposed annexe could feature a stone facade, this would carry through a feature from the main dwelling and appear more cohesive, once built, with the wider site and its setting in the street scene given it would be visible travelling north through Fforest Goch”.*

Highways & Pedestrian Safety

- 2.5 *"It would be beneficial to provide a drawing on plan that cars parked within the site can access and egress the site in a forward gear. This will be necessary given the classification of the road and its traffic sensitive nature. Providing a safe and effective parking arrangement can be met, a proposal of this nature would likely result in no detrimental impact on the highway users".*

Biodiversity

- 2.6 *"Biodiversity enhancements are necessary for all across all development types. Accordingly, you are advised of the need to undertake an Extended Phase 1 habitat survey of the site for submission as part of your application".*

Sustainable Drainage

- 2.7 *"New developments of more than 1 house or where the construction area is of 100m² or more will require sustainable drainage to manage on-site surface water. These systems must be approved by the Council's Engineering Service acting in its SuDS Approving Body (SAB) role before construction work begins".*

Policy SC1 Settlement limits

- 2.8 *"The application, if submitted, would propose an annexe that would be occupied by a family member. In doing so, the consideration would be similar to that of an extension. Conditions can be imposed securing that the build is not sold or sub-let independently of the host dwelling – this would be of importance given the prevailing land use policy context".*
- 2.9 It should be noted the Development Management Manual states in relation to pre-application advice at paragraph 6.3.22:

"It is important that pre-application advice provided by an LPA is consistent, as it will be used by applicants to inform their development proposals. Consistency, and the effectiveness of pre-application discussions, can be improved if LPAs ensure that suitably experienced officers conduct negotiations and provide advice. LPAs should also seek to provide continuity in officer involvement so that any related planning applications are dealt with by the same officer."

Structure

- 2.10 The statement assesses the requirement of local and national planning policy relevant to the application site and is structured as follows:

- Section 3: Site Description & Surrounding
- Section 4: Planning History
- Section 5: The Proposed Development
- Section 6: Planning Policy Context
- Section 7: Key Planning Considerations
- Section 8: Conclusion

3.0 Site Description & Surroundings

- 3.1 The application site is located in the peri-rural community of Fforest Goch, situated approximately 830 metres south of the settlement of Rhos, Neath Port Talbot. The application site currently comprises the dwelling at Bryn Celyn and residential curtilage alongside a parcel of land which immediately adjoins Bryn Celyn, including the property's integrated garage, driveway and garden area.
- 3.2 Bryn Celyn is accessed from the A474 Neath Road at the site's eastern boundary, via a gated domestic driveway. The site's eastern boundary comprises a hedgerow and stone wall which runs parallel to Neath Road. A number of trees are located within the residential curtilage of Bryn Celyn.
- 3.3 The house has a garden to the south of the site and the client owns a parcel of land that immediately adjoins Bryn Celyn to the north. The parcel of land is currently a mixture of grass and scrub with semi mature and mature trees to the perimeter which provide a good level of screening from the road.
- 3.4 In respect of surroundings, residential dwellings are found to the east and south of the site. A commercial/agricultural unit neighbours the site to the south, whilst agricultural land makes up the primary land use in the surrounding area. As highlighted above, the A474 Neath Road adjoins the site's eastern boundary. A pedestrian pavement separates the site and the carriageway, and runs the length of the eastern boundary, providing pedestrian access north to Rhos and south to Bryncoch
- 3.5 Bryn Celyn itself is a two-storey property, with a traditional stone frontage to the original house and a contemporary domestic extension to the rear. The modern addition complements the traditional features of the original dwelling and features dormer windows, a rendered finish and hipped slate roof.
- 3.6 In respect of services, the house is connected to mains water, electric, telecoms and sewage. The client has recently upgraded the house to 3 phase electric so that they can add additional charging points for electric cars in future.

4.0 Planning History

- 4.1 Asbri Planning have undertaken a review of the Neath Port Talbot online planning register, which did not identify any relevant historic planning applications associated with the application site. The pre-application advice provided by the Council confirms this position, as it was provided prior to the submission of planning application P2024/0035.
- 4.2 Application P2024/0035, submitted in January 2024 proposed the *"Change of use of field to domestic curtilage in order to facilitate the construction of a detached self-contained residential annex with domestic workshop and store, means of enclosure, together with turning area/courtyard all for use ancillary to no. 1 Neath Road Fforest Goch"*. The application was refused on 16 May 2024. The decision notice includes a single reason for refusal, and states:
- "1. The proposed development, by reason of its form, siting and scale, constitutes an unjustified, undesirable and inappropriate form of development outside any existing settlement boundary, within the open countryside and green wedge. The increase in associated domestic paraphernalia on the site, increased parking provision together with the proposed building itself would encroach into a currently undeveloped area and would result in the spread and intensification of domestic use that would be prejudicial to the rural character of the area and result in the unacceptable erosion of the open countryside as well as a harmful incursion into the green wedge, both of which should remain for the most part undisturbed. As such, the development would be contrary to established national and local planning policies and would set an undesirable precedent for further applications for similar development in this area, contrary to policies SC1, EN3 and BE1 of the Neath Port Talbot Local Development Plan and advice contained within Planning Policy Wales 12."*
- 4.3 Since the original proposal, the revisions to the scheme have been based entirely on the direction and suggestions from the LPA as part of discussions during and following the determination of the planning application. This has included moving the siting of the proposal outside of the large oak tree root protection zone and providing a linkage between the existing dwelling and annex via a canopy. It was decided to propose a wall and flat roof to provide better architectural rhythm between the two structures and importantly improve the relationship and connectivity. As highlighted above, the development scheme has been reformulated in order to respond to the reasons for refusal listed above. Further informal discussions have taken place with

the Local Planning Authority, in order to deliver a scheme which positively responds to the issues previously raised. These details are discussed in further detail in the sections that follow. Evidence of the discussions between the applicant and the Local Planning Authority is included as part of the resubmission.

- 4.4 In respect of nearby developments, an agricultural building has been erected to the north of the application site. The agricultural building is significantly larger than the proposed residential annex, as demonstrated in the accompanying drawing reference 060 Sk008. Like the proposed annex, the building is located within the countryside and the designated green wedge. Please refer to the enclosed context photographs attached at **Appendix 1**, which highlights the prominence of the agricultural building within the countryside and green wedge. It is considered the position of the agricultural unit has greatly altered the street scene and setting of the countryside. By comparison, the proposed development is entirely subservient to the existing dwelling and benefits from a close visual relationship to the main residence.

5.0 The Proposed Development

- 5.1 The proposals seek the development of a residential annex at Bryn Celyn, Neath Road, Fforest Goch, SA8 3JB. The applicant seeks to utilise the section of the field adjacent to the house to erect a self-contained annex for their daughter who has severe anxiety, Obsessive-Compulsive Disorder (OCD) and Autistic Spectrum Disorder (ASD). She is unlikely to be able to live independently after completing college and the annex has been specifically designed to offer her a level of independence whilst ensuring the monitoring and support she requires.
- 5.2 The proposed annex is a single storey in height and will employ a traditional appearance, utilising rendered elevations and a pitched roof. It is envisaged the proposal will complement the form of the existing dwelling at Bryn Celyn, and draws design inspiration from its traditional appearance. The design of the proposal has been formulated to complement the edge of settlement location and demonstrates subservience to the existing dwelling. The annex and dwellinghouse are joined via a connecting linkage, to provide visual continuity and create the courtyard appearance. This linkage has only been possible due to the re-siting and re-orientation of the proposed annex, strengthening the relationship between the two structures. In this regard, the proposal can be considered an extension in some aspects, an off shoot of the dwellinghouse.
- 5.3 In terms of accommodation, the annex makes provision for a kitchen diner / open plan living area, alongside a double bedroom, bathroom and entrance hallway. The proposal represents a significant reduction in floorspace upon the previous scheme and this is reflected in a significantly reduced scale and form.
- 5.4 The annex is located immediately adjacent to the house, off the existing driveway. The proposal will result in the need for small extension to the existing driveway in order to allow for a continuous level surface to the annex. The annex will form a courtyard style arrangement when considered with the adjoining dwellinghouse. The small extension to the existing driveway will allow turning for vehicles to exit the property safely as they must currently reverse out onto the busy road, resolving a longstanding highway safety concern for the applicant.
- 5.5 The building has been designed to sit discreetly in the landscape. It will be cut into the site to form a new courtyard with the house and to provide level access between the buildings. The building will be made from sustainable materials.

- 5.6 The annex contains only 1 no. bedroom and is for the client's daughter who currently lives in the house. There is no proposed increase to the occupancy of the site. It is not anticipated that a significant additional demand will be placed on sewage, electric or water use.

6.0 Planning Policy Context

- 6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that: "If regard is to be had to the Development Plan for any purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the Plan unless material considerations indicate otherwise".
- 6.2 The development plan that encompasses the application site is the Neath Port Talbot Local Development Plan 2011-2026, adopted on January 2016. Material considerations at a local level also include the relevant Supplementary Planning Guidance. Material considerations at a national level include Planning Policy Wales Edition 11 (February 2021), and the appropriate Technical Advice Notes (TANs).
- 6.3 Section 38(4) of the PCPA 2004 (as amended) states that: "For the purposes of any area in Wales the development plan is: (a) the National Development Framework for Wales, (b) the strategic development plan for any strategic planning area that includes all or part of that area, and (c) the local development plan for that area". Accordingly, the policies of relevance contained within the National Development Framework Future Wales: The National Plan 2040 and the adopted LDP are now discussed.

Future Wales: The National Plan 2040

- 6.4 Future Wales is the highest tier of development plan in Wales. It is focused on solutions to issues and challenges at a national scale. Its strategic nature means it does not allocate development to all parts of Wales, nor does it include policies on all land uses. Nevertheless, planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.
- 6.5 Policy 1 – Where Wales Will Grow indicates the Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The application site is located within the Swansea Bay National Growth Area.
- 6.6 Policy 9 - Resilient Ecological Networks and Green Infrastructure states 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.

6.7 Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.

6.8 Policy 28 – National Growth Area – Swansea Bay and Llanelli indicates Swansea Bay and Llanelli will be the main focus for growth and investment in the South West region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. The Welsh Government will work with regional bodies and local authorities to promote and enhance Swansea Bay and Llanelli's strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.

Neath Port Talbot Local Development Plan 2011-2026

6.9 The LDP Proposals Map indicates the subject site is situated outside of the defined settlement boundary and is therefore located in the 'countryside'. Furthermore, the application site is located in the designated Green Wedge. The proposed development is subject to the following policies within the adopted LDP.

6.10 **Policy SP 14 The Countryside and the Undeveloped Coast** indicates the countryside and undeveloped coast, including landscapes, seascapes and agricultural land, will be protected and where feasible enhanced through the following measures:

1. The protection of the open countryside through the control of inappropriate development outside settlement limits;

2. The protection of the undeveloped coast through the control of inappropriate development;
 3. The designation and protection of Special Landscape Areas;
 4. The designation and protection of Green Wedges.
- 6.11 The proposals map indicates the application site is situated within the defined green wedge, as set out under **Policy EN 3 Green Wedges** states in order to prevent the coalescence of settlements and to protect the setting of urban areas, Green Wedges have been designated in the following locations:
- EN3/1 - Alltwen / Rhos / Bryncoch / Neath Abbey / Leiros Park
- 6.12 Within these areas there is a presumption against inappropriate development.
- 6.13 **Policy SC 1 Settlement Limits** states development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.
- 6.14 Outside settlement limits, development will only be permitted under the following circumstances:
1. It constitutes a sustainable small-scale employment use adjacent to a settlement limit; or
 2. It constitutes live-work unit(s) immediately adjacent to a settlement limit in the Valleys Strategy Area only; or
 3. It constitutes the small-scale expansion of an existing business or the suitable conversion of an existing building; or
 4. It constitutes the appropriate replacement of an existing dwelling; or
 5. It is an affordable housing exception site; or
 6. It is an appropriate rural enterprise dwelling; or
 7. It is an appropriate 'One Planet Development'; or
 8. It is a sustainable tourism or farm diversification proposal that is suitable in a countryside location; or
 9. It is associated with the provision of public utilities, infrastructure and waste management facilities that cannot reasonably be located elsewhere; or
 10. It is associated with either agriculture, forestry, minerals or energy generation; or
 11. It relates to the appropriate provision of accommodation for Gypsies / Travellers; or
 12. It constitutes the provision of open space and small-scale ancillary facilities adjoining the settlement limit.

- 6.15 Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form.
- 6.16 **Policy EN 5 Conversion and Extension of Existing Buildings in the Countryside** states the alteration, extension or conversion of existing suitable buildings outside the defined settlement limits for residential, employment, or tourism uses will only be permitted where (inter alia):
- In the case of residential extensions, the extension does not result in a disproportionate increase in the size, scale and massing of the building.
- 6.17 Paragraph 5.3.25 indicates *“The size of extension likely to be acceptable will depend on the circumstances of each individual case”*.
- 6.18 **Policy SP 15 Biodiversity and Geodiversity** indicates Important habitats, species and sites of geological interest will be protected, conserved, enhanced and managed through the following measures:
1. The identification of the following Internationally and Nationally designated sites within the County Borough to enable their protection:
 - a) Special Areas of Conservation (SACs) and Ramsar Sites;
 - b) Sites of Special Scientific Interest (SSSIs);
 - c) National Nature Reserves (NNRs).
 2. The identification and protection of sites of regional and local importance;
 3. The protection of important natural heritage features.
- 6.19 **Policy EN 6 Important Biodiversity and Geodiversity Sites** states development proposals that would affect Regionally Important Geodiversity Sites (RIGS), Local Nature Reserves (LNRs), Sites of Interest for Nature Conservation (SINCs), sites meeting SINC criteria or sites supporting Local Biodiversity Action Plan (LBAP) or S42 habitats or species will only be permitted where:
1. They conserve and where possible enhance the natural heritage importance of the site; or
 2. The development could not reasonably be located elsewhere, and the benefits of the development outweigh the natural heritage importance of the site.
- 6.20 Mitigation and/or compensation measures will need to be agreed where adverse effects are unavoidable.

- 6.21 **Policy EN 7 Important Natural Features** indicates development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds will only be permitted where:
1. Full account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; or
 2. The biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.
- 6.22 **Policy SP 16 Environmental Protection** states air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures:
- 6.23 **Policy SP 20 Transport Network** indicates the transport system and infrastructure will be developed in a safe, efficient and sustainable manner through the following measures:
1. Implementing key transport projects and supporting schemes identified in the Joint Transport Plan;
 2. Promoting connectivity and access to public transport through improving bus and rail facilities;
 3. Supporting enhancements to the walking and cycling network;
 4. Promoting park and share schemes along key highway routes;
 5. Promoting efficient use and links to the transport network through the identification of a road hierarchy;
 6. Restricting development which would have an unacceptable impact on highway safety;
 7. Requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport;
 8. Requiring appropriate parking provision;
 9. Facilitating movement of freight by means other than road.
- 6.24 **Policy TR 2 Design and Access of New Development** states 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.

6.25 **Policy BE 1 Design** indicates all development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;
2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;
3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;
4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;
5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;
6. It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);
7. It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;
8. It uses resources, including land and energy, as efficiently as possible through:

- a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;
 - b) The layout and form of the development does not preclude the reasonable use of other adjacent land;
 - c) Developing brownfield land in preference to greenfield land where possible;
 - d) Minimising building exposure while maximising solar gain.
9. Its drainage systems are designed to limit surface water runoff and flood risk and prevent pollution;
 10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.

6.26 In addition to the policies outlined above, the following policies are of relevance to the proposals.

Policy Reference	Relating to...
<i>Overarching Policies</i>	
SP 1	Climate Change
SP 2	Health
SP 3	Sustainable Communities
SP 4	Infrastructure
SP 21	Built Environment and Historic Heritage
SP 22	Welsh Language Sensitive Area
<i>Area Policies</i>	
SP 6	Development in the Valleys Strategy Area
<i>Topic Based Policies</i>	
SP 10	Open Space
EN 8	Pollution and Land Stability
M 1	Development in Mineral Safeguarding Areas
M 2	Surface Coal Operations
W 3	Waste Management in New Development
WL 1	Development in Language Sensitive Areas

Supplementary Planning Guidance

6.27 Supplementary Planning Guidance (SPG) is produced to provide further detail on certain policies and proposals contained within the Neath Port Talbot Local Development Plan (LDP). SPG do not have the

same status as adopted development plan policies, however, they may form a material consideration in determining planning applications. The following SPG have been adopted:

- Parking Standards (October 2016)
- Biodiversity and Geodiversity (May 2018)
- Renewable and Low Carbon Energy (July 2017)
- Design (July 2017)

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- 6.28 In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, 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”.
- 6.29 PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of ‘placemaking’ should be at the heart of the planning system. It is stated at Paragraph 2.8 that development proposals “must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act’s Sustainable Development Principle”. Paragraph 2.9 goes on to clarify that “The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making”.
- 6.30 PPW defines placemaking as follows: “Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well-being in the widest sense”.

Technical Advice Notes

- 6.31 In addition to the national policy guidance set out above, Technical Advice Notes (TANs) are land-use planning guidance documents issued by the Welsh Government to provide practical advice and guidance on areas of policy set out in Planning Policy Wales. TANs of relevance to the proposed development include:

- TAN 11: Noise
- TAN 12: Design
- TAN 15: Development & Floodrisk
- TAN 18: Transport

7.0 Key Planning Considerations

7.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- Principle of Development
- Acceptability of Development in the Green Wedge
- Sustainability
- Design
- Ecology & Biodiversity
- Trees
- Highways, Access & Parking

Principle of Development

7.2 As highlighted above the application site is located outside of the defined settlement boundary, as specified by Policy SC 1 Settlement Limits. Policy SP 14 The Countryside and the Undeveloped Coast indicates the countryside will be protected and where feasible enhanced through the following measures which include (inter alia):

- The protection of the open countryside through the control of inappropriate development outside settlement limits; and
- The designation and protection of Green Wedges.

7.3 Policy SC 1 provides a development permittance criterion where proposals outside of the settlement limit will be considered acceptable. This includes (inter alia), circumstances where development constitutes a sustainable small-scale employment use, a live work unit or an affordable housing exception site. It is acknowledged the proposed development does not conform to a use that falls within the 12-point development permittance criterion. However, it should be noted the proposals do not represent a 'stand-alone' development. The proposals are spatially tied to the existing dwelling at Bryn Celyn. Co-location of the residential annex, alongside Bryn Celyn is in this case, essential.

7.4 As highlighted in preceding sections the proposed residential annex will serve the applicant's daughter, who has severe anxiety, Obsessive-

Compulsive Disorder (OCD) and Autistic Spectrum Disorder (ASD). She is unlikely to be able to live independently after completing college and the annex has been specifically designed to offer her a level of independence whilst providing the monitoring and support that she requires. Given the speciality and niche purpose of the proposed development, the proposals are unlikely to fall in to a defined category within Policy SC 1.

- 7.5 This point is acknowledged by pre-application advice reference Q2022/0149, 31st October 2022, which states in relation to Policy SC 1:

"It is noted however that the application, if submitted, would propose an annexe that would be occupied by a family member. In doing so, the consideration would be similar to that of an extension. Conditions can be imposed securing that the build is not sold or sub-let independently of the host dwelling – this would be of importance given the prevailing land use policy context".

(Underlining added by Asbri Planning for emphasis)

- 7.6 Nonetheless, Policy SC 1 indicates where development is permitted outside of the defined settlement limits, "new buildings must be located adjacent to existing buildings or settlements wherever possible, being of an appropriate scale and form." The proposed development positively responds to this requirement, siting the proposals directly adjacent to the existing Bryn Celyn dwelling in a field parcel which immediately abuts the residential curtilage of Bryn Celyn. Furthermore, the scheme design has been formulated to recognise the importance of an appropriately scaled development and a form that is suitable in the context of the adjoining dwellinghouse. The Annex is a single storey in height and is 'cut in' to ground level in order to reduce massing and visual impact. The courtyard created between main dwelling and ancillary out-buildings is a typical feature in rural areas. As noted above, the revised scheme has been significantly reduced, seeing the scale and form greatly downsized in recognition of the site location and setting. It is considered the scheme revisions further enhance the acceptability of the proposals in this regard. The connecting linkage between the existing dwelling and proposed annex further strengthens the relationship between the two structures.
- 7.7 On this basis the proposal is subservient to Bryn Celyn and of an appropriate form and scale. The proposal can therefore demonstrate part compliance to the requirements of Policy SC 1 due to its siting adjacent to the existing dwelling and the proposed scale and form of development.

7.8 Therefore, in order to establish a principle of development, the particularities of the scheme and comments received as part of the pre-application advice point us towards considering the merits of the scheme against Policy EN 5 Conversion and Extension of Existing Buildings in the Countryside, which states the *"alteration, extension or conversion of existing suitable buildings outside the defined settlement limits for residential, employment, or tourism uses will only be permitted where...* (inter alia):

- *...In the case of residential extensions, the extension does not result in a disproportionate increase in the size, scale and massing of the building."*

7.9 This is particularly relevant in respect of the revised submission scheme, which proposes a connecting linkage between the existing dwelling and proposed annexe. The proposals bears a strong resemblance to a conventional extension. When considering the proposals in the context of Policy EN 5, the proposed development would not result in a disproportionate increase in the size, scale and massing of the existing dwelling. The pre-application advice confirms this, when appraising design, the response states *"The annexe is currently shown to be sited to the North of the host dwelling, and on plan, appearing smaller in scale. It would be reasonable to consider the annexe therefore as subservient"*. We concur that the proposal is subservient to the main dwelling and would not represent a disproportionate increase in size, scale and massing of the main dwelling. On this basis, the proposals adhere to Policy EN 5 Conversion and Extension of Existing Buildings in the Countryside – establishing a principle of development at the subject site.

Acceptability of Development in the Green Wedge & Countryside

7.10 As indicated above, the site is situated within the 'countryside' under Policy SP 14 The Countryside and the Undeveloped Coast, which indicates the countryside will be protected and where feasible enhanced through the following measures which include (inter alia):

- The protection of the open countryside through the control of inappropriate development outside settlement limits; and
- The designation and protection of Green Wedges.

7.11 The proposed development is located within the defined Green Wedge, subject to Policy EN 3 which seeks to prevent the coalescence of settlements and protects the setting of urban areas. Within the designed Green Wedge there is a presumption against inappropriate development.

- 7.12 In respect of green wedge designation PPW12 paragraph 3.74 states *"Inappropriate development should not be granted planning permission except in very exceptional circumstances where other considerations clearly outweigh the harm which such development would do to the Green Belt or green wedge"*.
- 7.13 Paragraph 3.75 states *"The construction of new buildings in a Green Belt or green wedge is inappropriate development unless it is for the following purposes:*
- *justified rural enterprise needs;*
 - *essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the Green Belt or green wedge and which do not conflict with the purpose of including land within it;*
 - *limited extension, alteration or replacement of existing dwellings; or*
 - *small scale diversification within farm complexes where this is run as part of the farm business."*
- 7.14 As highlighted above, in the pre-application advice the LPA acknowledges that the proposed development would be similar to that of extension rather than a standalone, new build development. On this basis, the proposal can be characterised as a "limited extension, alteration or replacement of existing dwellings" and therefore does not represent inappropriate development, in accordance with PPW12 paragraph 3.75.
- 7.15 Paragraph 3.78 states *"Other forms of development would be inappropriate development unless they maintain the openness of the Green Belt or green wedge and do not conflict with the purposes of the designation."* Furthermore, the supporting policy related text at paragraph 5.3.19 of the LDP states *"Apart from those forms of development which are specifically defend as appropriate, any other development which would prejudice the openness of the Green Wedge are considered to be inappropriate"*. Given the spatial context and setting of the proposed development site, we believe the proposals will not prejudice the 'openness' of the Green Wedge. As existing the application site benefits from extensive screening due to mature trees which are situated around the perimeter of the site area. The submitted Tree Constraints Plan confirms this position. Views of the site are limited from the passing road due to this screening. The existing boundary tree planting will be improved with infill planting to fill gaps and increase screening. Three small trees to the east boundary are to be removed as part of the development (see tree survey) and will be replaced by a minimum of 9 no. similar trees to be included in the infill planting. We

therefore believe the retention of the majority of trees on-site alongside a comprehensive planting scheme will improve the already substantial levels of screening. On this basis, the impact of the proposed development upon 'openness' of the Green Wedge will be negligible.

- 7.16 The sensitivity of the design should also be considered in this regard. The proposals are highly sympathetic to the countryside setting. The single storey ridge height is significantly below the adjoining existing dwelling. Furthermore, the development is 'cut into' the level of the development site, reducing massing and scale so as to reduce visual impact. In summary, we believe the proposal will be of negligible impact upon the openness of the countryside and green wedge. This is demonstrated by the close relationship of the existing dwelling and proposed annex, a feature which has been further enhanced as part of the revised proposals.
- 7.17 The purpose of the Green Wedge seeks to *"prevent the coalescence of settlements"*. The proposal is for a small residential annex that is closely related to an existing dwelling in the Countryside. The purpose of the development is to serve the needs of the family who occupy the dwelling and will not create an intensification of the site through increased occupancy. The applicant is happy for a planning condition to be attached to any future permission which links the proposed development with the dwellinghouse, in order to ensure the annex cannot be separately occupied. Furthermore, the proposal has been sensitively designed to assimilate with the countryside setting. We consider a proposal of this scale does not represent the coalescence of settlements, nor would it inhibit the prevention of coalescence of settlements.
- 7.18 Should the Local Planning Authority take the view that the proposal does represent 'inappropriate development' we wish to highlight the *"very exceptional circumstances where other considerations clearly outweigh the harm with such development would do to the Green Wedge"* as advocated within paragraph 3.74 of PPW12. This point is reaffirmed at paragraph 5.3.18 of the LDP, which states *"Within the designated Green Wedges, inappropriate development will not be permitted except in very exceptional circumstances"*.
- 7.19 Given that any harm to the Green Wedge would be minimal, (owing to the sensitive design and linkages to the existing dwelling house) we believe this proposal could be considered to fulfil the 'very exceptional circumstances' where the benefit of such a development would outweigh any such harm.
- 7.20 As set out above, the proposal responds to a specific need of the family who live in Bryn Celyn, to provide a dedicated living space for their daughter who suffers from severe anxiety, OCD and Autistic Spectrum

Disorder (ASD) and will be unable to able to live independently without dedicated family support. PPW12 states at paragraph 3.6 *“Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility Impairments”*, highlighting the need for development proposals which meet the needs of people with such impairments. We believe the development responds directly to these highly specific requirements.

7.21 PPW12 indicates the key themes in relation to ‘Active and Social Trends and Issues’ include (inter alia):

- *“facilitating a range and choice of housing to respond to the change in household need,*
- *assisting in the delivery of cohesive communities which will meet the needs and are accessible to all members of society,*
- *... acknowledging the importance of inclusive communities and the wider environment for good health and well-being;”*

7.22 The proposals have been formulated to meet a distinct family need for suitable accommodation, whilst also contributing to the delivery of cohesive communities that meet the requirements of all members of society. PPW 12 specifically advocates the importance of inclusive communities and the linkage between the wider environment for good health and well-being.

7.23 The proposals respond to the requirement of a disabled young person who is highly likely to require on-going family care and support. The scheme will enable the owners of Bryn Celyn to offer this support. PPW12 indicates housing supply should respond to the differing needs of communities and includes *“the housing requirements of older people and people with disabilities”*.

7.24 Furthermore, at paragraph 4.2.12 PPW12 states *“Planning authorities should also identify where interventions may be required to deliver the housing supply, including for specific sites. There must be sufficient sites suitable for the full range of housing types to address the identified needs of communities, including the needs of older people and people with disabilities”*. This section specifically relates to housing supply and where interventions may be necessary. The paragraph highlights the need for a full range of housing types to meet community needs, including those with disabilities. Once again, the proposed development directly responds to the requirements of PPW12.

7.25 The Placemaking Charter sits at the heart of PPW12 and supports the implementation of placemaking in Wales. It is envisaged the charter will support the development of high-quality places for the benefit of

their communities. The 'People and Community' tenet states *"The needs, aspirations, health and well-being of all people are considered at the outset. Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality"*. As above, the proposals respond to the distinct needs of the local community and will allow for a young person to live semi-independently with the support of family, crucially allowing for a family unit to remain within their community. We believe significant weight should be attached to these considerations as the proposals are wholly 'people focussed' allowing a family to continue to enjoy their sense of community & familiarity within the community, which will significantly benefit well-being in the long term.

Sustainability

- 7.26 The proposed development will be constructed using high quality and local materials, to the benefit of sustainability and reducing the embodied energy of construction materials. The building has been designed to be as sustainable as possible. It will be constructed from low carbon materials with high levels of insulation and very low running costs.
- 7.27 The proposed development will adjoin an existing dwelling and will therefore utilise the existing infrastructure that serves Bryn Celyn. In respect of services, the house is connected to mains water, electric, telecoms and sewage. The client has recently upgraded the house to 3 phase electrics so that they can add additional charging points for electric cars in future. The site will therefore have suitable access to sustainable infrastructure.
- 7.28 The application site occupies a sustainable location approximately 65 metres north of the nearest bus stop (Fforest Goch) on Neath Road, providing access to the 56, 256, 903 & 905 routes which serve Neath, Neath Abbey, Pontardawe, Rhos, Bryncoch, Abercrave, Cwmtwrch Isaf & Ystalyfera. The access to a public transport route presents this sustainable mode of travel as a realistic alternative to travel via private vehicles. The nearest services and facilities are found in the nearby village of Rhos, approximately 1 km north of the site. Rhos benefits from a community centre, post office, primary and public house. The proposal will therefore adhere to Policy SP 1 Climate change, which seeks to reduce dependence on private cars through the promotion of alternative means of transport.
- 7.29 As highlighted in the preceding section, the proposals directly relate to an existing dwelling, and it is anticipated the use of the proposed development will be exclusively tied to the main dwelling. The association with the existing dwelling means the planning considerations are

comparable to that of a domestic extension, which can be viewed as preferable to an entirely new build development.

- 7.30 In summary, the proposed development will utilise sustainable materials and has been designed with sustainability as a principal consideration. The site location in close proximity to public transport routes will promote sustainable travel. The development is directly associated with an existing dwelling and should be viewed as a preferable extension/adaptation as opposed to an entirely new build development.

Design

- 7.31 A comprehensive design review was undertaken following the refusal of the initial scheme and steps have been taken to reformulate the design, layout, siting and scale of the proposal in light of the reasons for refusal. In response, the applicant has since amended the proposals under this submission, to better reflect the context of the application site. Informal discussions were also undertaken with the Local Authority to understand the nuanced alterations that would contribute towards delivering an improved, and importantly, compliant development proposal. A summary of the scheme alterations is set out below:

- The store room, workshop and associated parking area have been omitted. The removal of these elements has allowed for the annexe to be re-sited and re-orientated, to be positioned closely to the existing dwelling.
- As a result, the scale, form and massing of the development is greatly reduced, providing a structure which is easily identifiable as subservient to the main dwellinghouse. The reduced footprint is also seen as more complementary to the sensitive setting of the development. The outward extent of the annex is pushed back towards the existing dwelling, creating a less intrusive structure, that better corresponds with edge of settlement, residential character and crucially occupies a smaller floorspace area.
- The relationship between the proposed annex and existing dwelling is strengthened as a result of the re-siting and re-orientation. A connecting structure links the two buildings, creating visual continuity between the annex and dwelling.
- The proposal will see a very small increase to the existing car parking area/driveway, although this is enclosed by the proposed annex structure, creating a court yard form. Importantly, this improved driveway area will allow for vehicles to turn within the site, meaning vehicles will not have to reverse back into the carriageway, allowing egress in a forward

gear – providing a highways safety improvement upon the existing access arrangements.

- 7.32 It is therefore considered the form, siting and scale of the proposals have been reduced to an acceptable level, in recognition of the context, setting and surroundings of the application site. It has been demonstrated how the applicant is keen to positively and proactively work with the Local Planning Authority throughout the development process in order to identify a form of development which can be considered acceptable by all parties.
- 7.33 As noted above, additional discussions were held to understand how the scheme could be improved upon. A connecting structure has been employed in order to tie the annexe and existing dwelling physically together. The linking structure provides visual continuity, providing a form of development that embraces traditional character.
- 7.34 In respect of materials, a rendered finish is proposed as this is the dominant elevational treatment of the existing dwelling. Whilst we acknowledge the front elevation of Bryn Celyn is stone, we believe a rendered finish provides a more suitable finish that corresponds with views of the house from a greater range of angles, not only of those viewing directly towards the frontage. The roof will utilise a grey corrugated metal and corresponds with the colour of the roof of the existing dwelling. The re-siting and re-orientation of the annexe provides the gable end as the main view of the proposal from the road.
- 7.35 Policy BE 1 Design indicates all development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. The Policy provides a criterion for development that be considered permissible. Each aspect of this policy is examined to demonstrate the scheme's compliance in respect of design.
1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;
 - The scheme has designed to assimilate itself with the established character of the setting. The design is highly sensitive and sympathetic to its setting within the Green Wedge and countryside. As required by Policy SC 1 the annex is sited directly adjacent to the existing dwelling. The proposal is attractive and utilises a high standard of design quality. Given the proposals location, the massing is considered appropriate and is clearly subservient to the existing dwellinghouse..

The form of the proposal is traditional and draws design inspiration from the existing dwellinghouse, channelling the observed vernacular to create a proposal which can be viewed as an extension of the existing dwelling. The linkage enhances the relationship between the two buildings and creates visual continuity.

2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;
 - The proposal has been fully designed with the site constraints in mind, and demonstrates a sensitive and sympathetic form given its countryside setting. The proposal utilises the natural topography of the site to embed the annex within the landscape.
3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;
 - The proposed development will be constructed using high quality and local materials, to the benefit of sustainability and reducing the embodied energy of construction materials. The building has been designed to be as sustainable as possible. It will be constructed from low carbon materials with high levels of insulation and very low running costs. A comprehensive scheme on new tree planting is proposed, which will contribute to the high levels of screening already observed on site.
4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;
 - The proposals will result in an improvement to highway safety, creating a courtyard with the existing dwelling which allows vehicles to enter and leave the site in a forward gear. The amenity of occupiers and adjacent land owners will not be prejudiced.

5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;
 - The proposals utilise a green infrastructure approach towards design, which retains as many trees as possible and includes a comprehensive scheme of landscape planting, with ecological and biodiversity enhancement measures.
6. It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);
 - The proposals are legible and well related to the existing dwellinghouse. The design is attractive in appearance and will enhance levels of natural surveillance in the locality.
7. It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;
 - The application site has good access to a bus stop situated a short distance south of the site, promoting the option of sustainable transport as a viable alternative to travel in private vehicles. The site benefits from good connections to the existing pedestrian pavements, allowing walking as a safe form of active travel to and from the site.
8. It uses resources, including land and energy, as efficiently as possible through:
 - a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;
 - b) The layout and form of the development does not preclude the reasonable use of other adjacent land;
 - c) Developing brownfield land in preference to greenfield land where possible;
 - d) Minimising building exposure while maximising solar gain.

- The building has been designed to be as sustainable as possible. It will be constructed from low carbon materials with high levels of insulation and very low running costs.
9. Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;
- Rainwater drainage will be managed by the existing drainage ditch on the site and a full drainage design will be completed and SAB approval confirmed before construction work begins.
10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.
- The proposals comprise a self-contained annex for their daughter who has severe anxiety, OCD and Autistic Spectrum Disorder (ASD). She is unlikely to be able to live independently after completing college and the annex has been specifically designed to offer her a level of independence whilst ensuring the monitoring and support she requires. The scheme therefore directly responds to an identified need for a young person with disabilities.

7.36 In summary, this section has demonstrated how the design of the proposed development fully accords with Policy BE 1.

Ecology & Biodiversity

7.37 An ecological appraisal has been prepared by Ecology Planning in support of the proposed development. The report finds the habitats within the Site are of negligible ecological value, being almost exclusively bare ground with a small amount of scrub. Likewise, the majority of the Wider Site is of the Site comprises a scrub/ bare ground/ ruderal matrix of common and widespread species, largely dominated by bramble and bracken. There is a very small patch of marshy grassland, which appears to be the only remnant of the likely natural habitat type. However, this area is far too small to really be considered of any value.

7.38 The tree line to the east is sparse and of limited ecological value. It does however provide a buffer between the Wider Site and the adjacent road. The tree line to the west and the associated ditch is of local ecological value.

7.39 There will be minimal loss of habitat to the location of the new dwelling and the existing habitat to be lost is currently species poor and of

negligible ecological value. Whilst not within the red line Site boundary, there will be enhancement works to the Wider Site to increase both the amenity and ecological value of this Site.

- 7.40 In respect of bats and protected species, the report finds the tree within the western tree line has very minor potential to support a bat roost. This was not subject to further survey, given that all impacts can be avoided. The split is not sufficiently large to support a significant roost. The Site is likely to support foraging and commuting bats of a variety of species, although is not large enough to support a significant number of individuals. There is no potential for bats to roost within the Site.
- 7.41 The mature oak at the south of the western tree line has minor potential to support roosting bats. This is located approximately 10m to the north west of the existing dwelling to the south of the Site. The feature is a small split in a horizontal branch that faces over the ditch to the west and therefore is unlikely to be significantly affected by light spill currently. The new dwelling will be located 9.5m to the east of the tree, and approximately 12m to the branch with minor potential. It is not considered likely that any additional light spill resulting from the new dwelling will impact on this feature. The western tree line and ditch will be unaffected and in the event that these provide a commuting route for bats, this function would remain unimpacted.
- 7.42 In respect of trees, the tree line to the east should be allowed to develop and gaps will be planted with new native saplings. Any of the species currently present will be suitable. The tree line to the west is mature and well established, but gappy. The hazel and holly understorey is present but the ground flora is largely absent. This would benefit from underplanting with native ground flora. A range of plug plants suitable for woodlands can be used, which will provide an attractive display throughout spring. It is recommended that these are purchased from Shipton Bulb's collection of native woodland bulbs³, which are grown in south west Wales. The species can be chosen by the applicant for visual interest as all will contribute to the ecological diversity above the existing level. In addition, native ferns can be planted to provide visual interest throughout the summer. Broad buckler fern is already present, but any of the native fern species sold by Shipton Bulbs will be suitable.
- 7.43 Whilst the Site offers foraging habitat/flightline for bats, roosting opportunities are largely limited to the two bat boxes present. Whilst these are unlikely to be affected by light spill from the new dwelling, it is recommended that the higher box can remain on the existing tree. The other should be re-sited onto the other mature oak, again on an

open section of trunk at 4-5m height. The low height of the new dwelling means that provision is more appropriate on trees.

- 7.44 The works undertaken will not result any significant ecological impacts to existing habitats. Impacts to protected species are likely to be negligible. The ecological connectivity and integrity of the Site will be enhanced in accordance with Local Plan policy EN7. The proposed enhancements will strengthen the value of the Site to a range of species, thereby increasing its function as part of the ecological network in the wider area in accordance with both local and national planning policies.

Trees

- 7.45 A Tree Report has been prepared by RTAC in support of the proposals and includes a tree survey, tree constraints plan and arboricultural impact assessment & tree protection plan. This section should be read in conjunction with the enclosed Tree Report and plans attached as appendices.
- 7.46 The site is bordered by outgrown hedgerows of native species broadleaf trees consisting mainly of mature and semi-mature common oak (*Quercus robur*) with some alder (*Alnus glutinosa*) along the stream boundary and an understory of hazel (*Corylus avellana*) and holly (*Ilex aquifolium*). Only trees with a stem diameter above 150mm at 1.5m above ground level have been recorded during this survey.
- 7.47 Two groups and twenty-two individual trees were recorded during this survey; the tables of species, age class and retention category are below:

Common Name	Botanical Name	Number of Trees
Group	<i>Mixed broadleaves</i>	2
Common oak	<i>Quercus robur</i>	9
Common alder	<i>Alnus glutinosa</i>	7
Common ash	<i>Fraxinus excelsior</i>	2
Common holly	<i>Ilex aquifolium</i>	2
Common hazel	<i>Corylus avellana</i>	1
Rowan	<i>Sorbus aucuparia</i>	1

Age Class	Number of Trees
Young	0
Semi-mature	21
Mature	3
Over Mature	0

Retention Category	Number of Trees
A	1
B	3
C	18
U	2

- 7.48 In respect of recommendations, T20 and T21 have been colonised by ash dieback (*Hymenoscyphus fraxineus*) and need to be removed. The group of trees in the south-east corner of the site, G2, T15 and T16, will be removed to facilitate the proposed development. See recommended works below:

Tree Number	Species	Work Required	Priority
G2	Mixed	Fell	1 Year
T15	Oak	Fell	1 Year
T16	Hazel	Fell	1 Year
T20	Ash	Fell	6 Months
T21	Ash	Fell	6 Months

- 7.49 The Arboricultural Impact Assessment indicates G2, T15 and T16 will be removed to facilitate the development; these are small, young and semi-mature trees and can be readily replaced within the site or along the boundaries.
- 7.50 The excavations for the proposed deck will have a small encroachment (approximately 2m²) into the RPA of T2; this amount of encroachment is unlikely to have an adverse effect on the vitality of the tree. The root spread of this tree will be unimpeded in any other direction.
- 7.51 In summary, the proposals seek to retain trees wherever feasibly possible, in addition to providing new tree planting as highlighted above. It is considered the proposals adhere to Policy EN 7.

Highways, Access & Parking

- 7.52 In its current arrangement, access is provided directly off Neath Road to a drive with space for 2 cars outside and one within the garage. There is currently no space to turn cars in the drive. The proposal seeks to utilise the existing access point from Neath Road. The scheme includes a small extension to the existing driveway to create a level area between the dwelling and annex. This will greatly benefit highway safety levels at the site and will remove the need to reverse out of the current access on to a main road. The scheme therefore complies with Policy TR 2 which seeks to ensure highway safety is maintained.
- 7.53 The adopted Parking Standards SPG indicates a parking requirement of 1 space per bedroom in respect of residential dwellings. The proposal is for a 1-bedroom residential annex and therefore requires a

parking provision of 1 space. However, there is no proposed increase to the occupancy of the house, with the applicant's daughter already residing in the existing dwelling. Therefore, no additional parking demand will occur as a result of the proposal. The existing level of parking provision is considered acceptable and will adequately serve the proposals in accordance with Policy TR 2 and the adopted Parking Standards SPG.

- 7.54 As highlighted in prior sections, the site is located approximately 65 metres north of the Fforest Goch bus stop on Neath Road providing access to the 56, 256, 903 & 905 routes which serve Neath, Neath Abbey, Pontardawe, Rhos, Bryncoch, Abercrave, Cwmtwrch Isaf & Ystalyfera. The access to a public transport route presents this sustainable mode of travel as a realistic alternative to travel via private vehicles. The proposal is therefore accessible by a range of travel means, including sustainable forms of public transport, in accordance with Policy TR 2.

8.0 Conclusion

8.1 This planning statement has provided the policy justification in support of a full planning application to be submitted to Neath Port Talbot County Borough Council for the proposed development of a residential annex, store room and workshop at Bryn Celyn, Neath Road, Fforest Goch, SA8 3JB. In summary, this Planning Statement makes the following pertinent points:

- The proposed residential annex will serve the applicant's daughter, who has severe anxiety, OCD and Autistic Spectrum Disorder (ASD). She is unlikely to be able to live independently after completing college and the annex has been specifically designed to offer her a level of independence whilst providing the monitoring and support that she requires. Given the speciality and niche purpose of the proposed development, the proposals are unlikely to fall in to a defined category within Policy SC 1.
- The proposal can demonstrate part compliance to the requirements of Policy SC 1 due to its siting adjacent to the existing dwelling and the proposed scale and form of development.
- In order to establish a principle of development, the particularities of the scheme and comments received as part of the pre-application advice point us towards considering the merits of the scheme against Policy EN 5 Conversion and Extension of Existing Buildings in the Countryside, The proposals adhere to Policy EN 5 Conversion and Extension of Existing Buildings in the Countryside – establishing a principle of development at the subject site.
- The pre-application advice indicates the planning considerations of the proposed development would be similar to that of extension rather than a standalone, new build development. On this basis, the proposal can be characterized as a *"limited extension, alteration or replacement of existing dwellings"* and therefore does not represent inappropriate development, in accordance with PPW12 paragraph 3.75.
- A comprehensive design review was undertaken following the refusal of the initial scheme and steps have been taken to reformulate the design, layout, siting and scale of the proposal in light of the reasons for refusal. In response, the applicant has since amended the proposals under this

submission, to better reflect the context of the application site.

- It is considered the form, siting and scale of the proposals have been reduced to an acceptable level, in recognition of the context, setting and surroundings of the application site. It has been demonstrated how the applicant is keen to positively and proactively work with the Local Planning Authority throughout the development process in order to identify a form of development which can be considered acceptable by all parties.
- The sensitivity of the design should also be considered in this regard. The proposals are highly sympathetic to the countryside setting. The single storey ridge height is significantly below the adjoining existing dwelling. Furthermore, the development is 'cut into' the level of the development site, reducing massing and scale so as to reduce visual impact. In summary, we believe the proposal will be of negligible impact upon the openness of the countryside and green wedge.
- The applicant is happy for a planning condition to be attached to any future permission which links the proposed development with the dwellinghouse, in order to ensure the annex cannot be separately occupied.
- Should the Local Planning Authority take the view that the proposal does represent 'inappropriate development' we wish to highlight the *"very exceptional circumstances where other considerations clearly outweigh the harm with such development would do to the Green Wedge"* as advocated within paragraph 3.74 of PPW12.
- Given that any harm to the Green Wedge would be minimal, (owing to the sensitive design and linkages to the existing dwelling house) we believe this proposal could be considered to fulfil the 'very exceptional circumstances' where the benefit of such a development would outweigh any such harm.
- This statement highlights how PPW12 supports proposals which *"meet the needs and are accessible to all members of society"*. Additionally, PPW12 indicates housing supply should respond to the differing needs of communities and includes *"the housing requirements of older people and people with disabilities"*.
- The proposals respond to the distinct needs of the local community and will allow for a young person to live semi-independently with the support of family, crucially allowing for a family unit to remain within their community. We believe significant weight should be attached to these considerations as the proposals are wholly 'people focussed' allowing a family to continue to enjoy their sense of community & familiarity

within the community, which will significantly benefit well-being in the long term.

- The proposed development can be considered sustainable, in accordance with both local and national level planning policy.
- In addition to the key points addressed above, the scheme demonstrate compliance with all other material considerations including; design, highways & access, parking, trees, ecology & biodiversity.

8.2 To conclude, we believe the proposals represent a policy compliant scheme when considered against the relevant local and national level planning policies. On this basis we politely request that the application be positively determined, and planning permission be granted without delay.

Appendix 1 - Site Context Photographs & drawing
ref. 060 Sk008