



22nd October 2025

Our Ref: 21.146

Mr Rhodri Griffiths
The Planning Department
Neath Port Talbot County Borough Council
The Quays
Baglan Energy Park
Neath
SA11 2GG

Dear Mr Griffiths,

FULL PLANNING APPLICATION

PROPOSED CONVERSION OF PARTIALLY CONSTRUCTED FOUR BEDROOM DWELLING HOUSES (PLOTS 2 AND 3 APPROVED UNDER P2021/0780) INTO 6 NO. ONE BEDROOM MAISONNETTES), FENESTRATION CHANGES AND ASSOCIATED WORKS

LAND AT PEARSON WAY, PENRHIWTYN, NEATH, SA11 2EJ

LRM Planning is instructed by Wellspring Homes to act as agent in the preparation of the full planning application described above.

BACKGROUND

This covering letter/Planning Statement is submitted in response to an invalidation letter received from Neath Port Talbot (NPT) dated 17/09/2025, and specifically addresses the points raised therein.

As you will be aware, the proposed site is part of a larger strip of land that was granted planning permission for the erection of eight dwellings back in 2021 under LPA Ref P2021/0780, subject to conditions. Applications to discharge associated conditions were made under LPA Refs P2022/0418 and P2022/0927, which were subsequently granted. Furthermore, S96a applications were made to secure minor changes to the approved scheme under LPA Refs P2022/0413, P2023/0395 and P2025/0114. These were again approved following the usual appraisal process.

The approved scheme is in an advanced stage of construction with the structures which are the subject of this application having been substantially complete, with the internal fit out the main aspect to be progressed.

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As it has been explained previously, the applicant has been in discussion with Pobl Group, a Registered Social Landlord, about the sale of certain plots which would be procured as affordable housing, over and above the original requirements. However, in order to meet the specific local housing needs coupled with the requirement to satisfy Welsh Governments design quality requirements there is a need for certain changes to be made which this application seeks permission for.

SUBMISSION DOCUMENTS

To assist the consideration of this proposal, the following plans and documentation are included:

DOCUMENT / PLAN	REFERENCE	PREPARED BY
*Site location plan plots 2-3	1007-S3-P1	Pentan Architects
Existing site plan plots 2-3	1014-S4-P1	Pentan Architects
Proposed site plan plots 2-3	1013-S4-P4	Pentan Architects
Existing house	1008-S1-P1	Pentan Architects
Maisonette Types C, D and E	3400-S4-P9	Pentan Architects
*Proposed street scene elevations	2101-S4-P2	Pentan Architects
Proposed boundary details	2121-S3-P1	Pentan Architects
Proposed bike store details	2120-S3-P1	Pentan Architects
Landscape specification and management plan	October 2025	TDA
Detailed soft landscaping proposals	TDA. 3111.01	TDA
Raft foundation GA plots 05-06	050	PHG
Raft foundation GA plots 07-08	060	PHG
Retaining wall GA and elevations plots 1 to 4	090	PHG
Retaining wall GA and elevations plots 5 to 8	091	PHG
Retaining wall construction letter	October 2025	PHG
Covering letter	August 2025	LRM Planning
*Application forms	August 2025	LRM Planning
Green Infrastructure Statement	October 2025	LRM Planning
Site Context Photographs	September 2025	LRM Planning
Tree survey and tree constraints plan	October 2025	Treescene (with LRM Planning clarification statement)
SI/ Coal Mining Risk Assessment	October 2025	Terra Firma (with LRM Planning clarification statement)

*Please note that these documents have already been provided as part of the application for the site and are provided here for ease of reference.

A sum of £1,925 (4 x £460 + the £85 portal service charge) was paid by the applicant, Wellspring Homes on 27/08/2025.

The additional requested fee of £920 (2 x £460) will be paid by the applicant in order to validate the application.

SUMMARY OF PROPOSED CHANGES

The proposed changes to the building are primarily focused upon the internal layout of each of the previously approved plots, constituting the conversion and adaptation of the built structures. Plots 2 and 3 are to be changed from two no. three storey dwelling houses (House type A) to six one-bedroom maisonettes, with each house containing three maisonettes (Maisonette types C, D and E). Maisonettes D and E are to span the ground floor and first floor whereas Maisonette C is situated on the lower ground floor only.

The proposed changes are limited to internal reconfigurations and minor alterations to the fenestration and doors. On the ground floor, the front windows on the south elevation will be replaced with doors. At first floor level, the existing loft store will be incorporated into the bedroom of Maisonette E. On the lower ground floor, the internal layout will be reconfigured to accommodate a kitchen/lounge, bathroom, and bedroom. Externally, the only alteration at this level is a reduction in the size of the doors on the northern elevation, which will be replaced with smaller standard doors in place of the existing bi-folding doors. Moreover, these changes will result in the net loss of bedrooms overall, compared to the approved scheme, as the proposal shifts from two no. four-bedroom houses to six one-bedroom maisonettes (net reduction of two bedrooms in total).

Maisonettes D and E are formed at the ground floor and first floor levels, with a pedestrian entrance formed to the left (Maisonette D) and right (Maisonette E) of the existing main entrance. The accommodation is such that the entrance hallways lead to a large open plan kitchen/lounge/dining room. Access from the ground floor kitchen/lounge leads to an external terrace which provides for the amenity needs of the maisonettes. A bathroom is also accessible from the main entrance hallway, and the stairs are accessible from the kitchen/ lounge area which lead to a bedroom and shower room on the first floors.

The first-floor bedroom of maisonette D is at the front of the property and is served by a dormer window with outlook onto the street. This bedroom is also served by an en-suite bathroom, positioned to the rear. The first-floor bedroom of maisonette E differs to this slightly, with the bedroom sitting at the rear of the property with a window orientated over the rear garden area. Maisonette E's en-suite is served by a front facing dormer window.

In terms of fenestration alterations, a rooflight has been removed from the bathroom of Maisonette D, and a new rooflight has been introduced above the stairs and landing area of the same unit. Furthermore, as the dwellings are now in the final stages of construction, an existing rooflight is present within the airing cupboard of Maisonette E. These fenestration adjustments have enabled the installation of additional solar

panels on the roof, thereby enhancing the overall energy efficiency of the maisonettes in accordance with both local and national policies.

These layouts and additional windows have been provided as part of the amendments in response to the invalidation letter received from the LPA and are considered to allow sufficient natural light and outlook for future occupiers.

Maisonette C is formed at lower ground floor level with access taken from the original entrance point with stair access leading to a hallway which feeds a large open plan kitchen/lounge/dining room, a shower room and main bedroom. Double doors from the kitchen/lounge/dining room lead into the garden. As such, externally the main change is the replacement of two windows at the front of the property with two doors as entrances to maisonettes D and E.

Whilst a total of 4 extra homes will be created, the total potential resident population of the properties will be below that of the approved scheme. This is due to the approved scheme containing two no. 8 person 4-bedroom homes (total potential population of 16 occupiers) being replaced with six no. 2 person 1-bedroom homes (total potential population of 12 occupiers). The homes will change from large family homes to small apartments and as such the likely impact upon education, public open space, and such services is anticipated to be reduced, compared to the potential of the previously consented scheme.

PARKING AND CYCLE STORE PROVISION

Provision has been made for six parking bays, equating to one space per bedroom, in accordance with Neath Port Talbot's parking standards Supplementary Planning Guidance (2016). While the guidance also recommends one visitor space per five dwellings, this requirement is considered unnecessary in this instance for several reasons:

- On-street visitor parking is already available as part of the approved scheme layout which is sufficient in meeting the needs of these units.
- Each unit is a one-bedroom dwelling, and the allocation of one space per bedroom provides sufficient capacity for anticipated demand.
- The dwellings are proposed as affordable units, which are statistically associated with lower levels of car ownership. As such, it is unlikely that all allocated spaces will be fully utilised.

Given these factors, the proposed parking provision is deemed both appropriate and policy compliant.

The scheme also offers two cycle stands for property (total of four in total) in an aim to promote active travel. This provision is also beyond the policy requirement of one per 5 bedrooms. These are located in the rear amenity areas, as noted on the proposed site layout plan (Ref. 3957 – PEN – ZZ – ZZ – DR – A – 1013 – S4 – P4).

BIN STORE MANAGEMENT PLAN

This bin store management plan has been prepared in response to the invalidation letter received from the LPA and details the waste management and storage proposed for each maisonette and its policy compliance.

Proposed waste management for each maisonette will comprise of separate bags of dry recyclables (cardboard and paper in one, plastics, tins and cans in another, and glass separate), a kitchen bin for general waste (50L in size) and a food caddy for kitchen/food waste, in line with the LA's recycling policy.

Storage for general waste is provided by a dedicated timber fenced bin store area for each property, sufficiently sized to accommodate up to three individual 120l wheelie bins. These are located within the rear amenity area, accessible via the side pathways which lead from the front into the rear garden area. In line with the LA's waste and recycling strategy, a dedicated storage unit is provided for each property (two in total) allowing dedicated external storage for bags, boxes and caddies, as noted on the layout, for each flat. Note that the specification for the storage unit is referenced on the layout (Ref. Ref. 3957 – PEN – ZZ – ZZ – DR – A – 1013 – S4 – P4).

Collection by the local authority is weekly (Thursdays), other than general waste which is collected every two weeks. The occupiers will be required to transfer waste materials from either their apartments or from the rear storage areas provided to the curb side on the morning of collection (by 5.30am). Again, replicating existing arrangements with other neighbouring properties.

This arrangement is considered sufficient and policy-compliant given the size of each dwelling and level of waste/recycling likely to be generated.

DRAINAGE

In terms of drainage, the previous drainage arrangements have been installed as per detailed in the extant consent. SAB and all previous foul arrangements also remain in place. The below condition was imposed for the amendments approved at the beginning of the year to plot 4:

"The development hereby approved shall be carried out in accordance with the foul water drainage scheme for the site approved under discharge of condition application P2022/0418 approved on 13 October 2022 and shall be fully implemented as approved prior to the occupation of either flat, and retained as such thereafter."

It is therefore considered that a similar approach is appropriate for this application.

PLANNING CONTRIBUTIONS

An invalidation notice received from NPT dated 17/09/2025 indicated that the application will require planning contributions through a Section 106 Agreement, specifically towards the provision of Public Open Space. Whilst the scheme will result in an overall reduction in total population on the site, thereby having a reduced impact in terms of infrastructure and service requirements, the applicant is accepting to the

request for £4,560 and will engage with the LPA through the appraisal process over the means to secure this financial contribution.

GREEN INFRASTRUCTURE

Please refer to the supporting Green Infrastructure Statement.

OTHER MATTERS

The invalidation letter received from the LPA detailed a number of additional documents/ supporting information required for validation purposes of the application, including:

- Geotechnical and Geoenvironmental Report / coal mining risk assessment – please find enclosed.
- Retaining wall construction details – please find enclosed.
- Tree survey – please find enclosed.

CONCLUSION

In conclusion, the proposal seeks approval for the conversion of two partially constructed four-bedroom dwellings into six no. one-bedroom affordable units, in line with local housing need and in support of the delivery of much needed affordable housing in NPT. This statement has highlighted the suitability of the site to the proposal, the importance of the site context/history in which this application has emerged, whilst responding directly to the invalidation notice received from NPT dated 17/09/2025.

The site and proposals evident alignment with both local and national policies are set out above, with the principle of development already established by the sites location within the settlement boundary of an established residential area. There are no constraints in terms of flooding, ecology, heritage, and all other considerations including waste, parking, cycle store provision, amenity and green infrastructure have been suitably appraised within this statement and supporting documentation/ plans. Accordingly, it is respectfully recommended that Neath Port Talbot Council put this application forward for approval.

I trust that I have provided everything required which will enable you to validate and process the application. Should you need any further information or clarification in the meantime, please do not hesitate to contact me.

Yours sincerely,



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Enc.