

Our Ref: PS/GJ/GM/26.105

Date: 20th April 2026

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Dear Rhodri,

Application under Section 192 of The Town & Country Planning Act for a Certificate of Lawful Use or Development

Ysgol Gynradd Gymraeg Treges, St Johns Terrace, Neath Abbey, SA10 7ND

Planning Portal ref. PP-14729485

Asbri Planning is appointed as planning agent to Neath Port Talbot County Borough Council in respect of the above certificate application for the proposed lawful development of an outdoor classroom at Ysgol Gynradd Gymraeg Treges, St Johns Terrace, Neath Abbey.

The following documents and drawings are submitted to accompany the certificate application:

Document/Drawing name (reference where appropriate)	Prepared By
Covering Letter	Asbri Planning
Planning Form	Asbri Planning
Site Location Plan (YGGT-ASL-00-00-DR-A-00001 P1)	Austin Smith Lord
Existing Ground Floor Plan (YGGT-ASL-00-00-DR-A-00010 P1)	Austin Smith Lord
Proposed Site Plan – Temporary Buildings (YGGT-ASL-00-00-DR-A-00901 P6)	Austin Smith Lord
Proposed Floor Plan, 3D and Elevations Rev C (CD01 C)	Kingsley Build Group
Proposed Details and Internal Room Elevations (CD02)	Kingsley Build Group
Aboriginal Report	ArbTS
Level 2 Building Recording	Archaeology Wales

Background

There are future plans to demolish and redevelop the northern building on the Ysgol Gynradd Gymraeg Treges site given that it currently not fit for purpose. A Prior Notification of Demolition has recently been submitted and is currently being considered by the Local Planning Authority (Ref: P2026/0236). An application for the new school block is proposed to be submitted shortly. The school currently only operates up to year 1 and will slowly expand each year with the introduction of new year groups and the main building at its current capacity, is not of sufficient size to accommodate the extra pupils. Throughout the demolition and subsequent redevelopment, there is a need to provide a solution for an additional classroom during the construction period of the new building.

Assessment

Part 32, Section A of the Town and Country Planning (General Permitted Development) Order 1995 establishes permitted development rights for alterations, extensions and new buildings at schools, colleges, universities and hospitals.

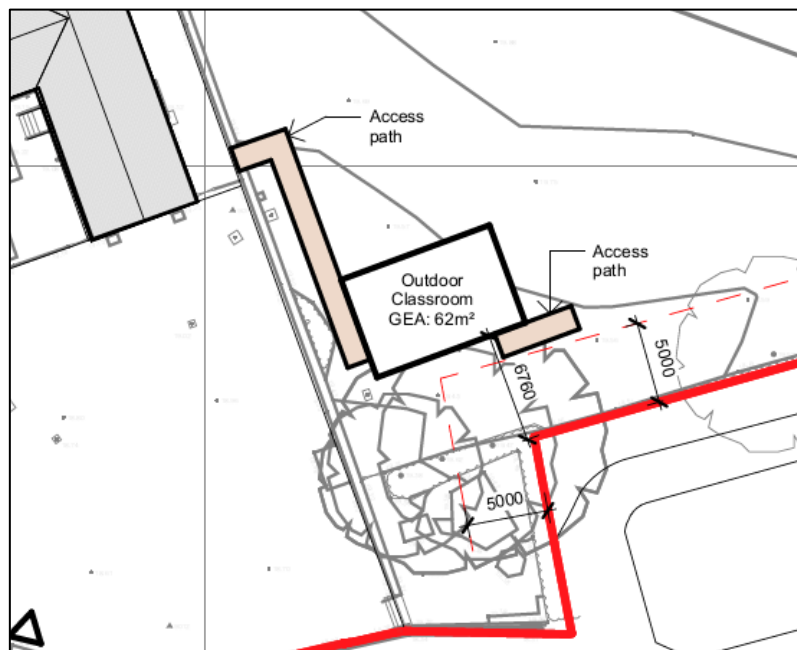
It is considered that the proposed development would constitute lawful use as it accords with each of the criterion detailed within the Order, as demonstrated in the following assessment. Section A.1 identifies a set of criteria that the proposals need to comply with in order to be considered permitted development. Each of these are discussed in turn below:

**a. if the cumulative gross floor space of any buildings erected, extended or altered would exceed—
(i) 25% of the gross floor space of the original school, college, university or hospital buildings; or
(ii) 100 square metres**

Despite the separate northern building being built at a later date than the Victorian structure to the front of the site, the Level 2 Building Survey Report issued by Archaeology Wales confirmed that the northern building was present on the 1940 OS Map. This makes it an 'original building' in terms of Permitted Development rights as it was in place at the point of adoption of the Town and County Planning Act on the 1st of July 1948. This therefore means that both buildings combined count as 'original' buildings for the purpose of the 25% calculation. Cumulatively, both existing buildings measure approximately 1,123m² in floorspace. The proposed 62m² outdoor classroom therefore falls well below 25% limit established by criterion a.(i). Whilst the northern block is proposed to be demolished, the Victorian building measures 628m² in isolation. Consequently, even when the northern block is demolished the outdoor classroom would still not exceed 25% of the gross floor space of the original school. The proposed development is therefore in accordance with criterion a.

b. if any part of the development would be within 5 metres of a boundary of the curtilage of the premises

As shown by the accompanying proposed site plan, the new outdoor classroom is located approximately 6.8m from the nearest boundary of the curtilage of the premises. The path which will provide access to the southern elevation is also beyond 5m from the boundary. Please see snippet of the Proposed Site Plan (Ref: YGGT-ASL-00-00-DR-A-00901 P6) below:



The proposed development is therefore in accordance with criterion b.

c. if, as a result of the development, any land used as a playing field at any time in the 5 years before the development commenced and remaining in this use could no longer be so used;

Despite the outdoor classroom being proposed on a grassed area, this is not a sports pitch and would not constitute a 'playing field'. The definition of a 'playing field' is set out in Schedule 4 of the General Development Management Procedure Order (Wales) 2012 as follows:

"Playing field means the whole of a site which encompasses at least one playing pitch." It then states that "Playing pitch means a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo"

The grassed area of reference has clearly not been in use for any of the above sports and therefore as a 'playing field' for over the 5-year period. The proposed development would therefore not contravene with criterion c.

d. if the height of any new building erected would exceed 5 metres;

As shown in the supporting elevations, the height of the building is set to be 3.02 metres. Accordance with criterion d can therefore be met.

e. if the height of the building as extended or altered would exceed—

(i)if within 10 metres of a boundary of the curtilage of the premises, 5 metres; or

(ii)in all other cases, the height of the building being extended or altered;

The proposals do not include any alterations to the height of the existing school building. Criterion e. is therefore not considered to be relevant.

f. if the development would be within the curtilage of a listed building;

There are no listed buildings within the curtilage of the school. Criterion f. is therefore not relevant.

g. the development would lead to a reduction in the space available for the parking or turning of vehicles; or

The unit is not located on an area which is used for the parking or turning of vehicles. The development will therefore have no impact on these matters in accordance with criterion g.

(h)unless—

(i)in the case of school, college or university buildings, the predominant use of the existing buildings on the premises is for the provision of education; or

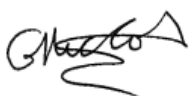
(ii)in the case of hospital buildings, the predominant use of the existing buildings on the premises is for the provision of any medical or health services.

The school is in predominant education use given that it currently operates as Ysgol Gynradd Gymraeg Tregelles in accordance with criterion (i).

In addition, the relevant fee of £333.50 has been made to Neath County Borough Council via an internal transfer.

I trust that the submitted documents allow the application to be validated and look forward to receiving details of application reference number and target determination date. If you have any queries in the meantime, please do not hesitate to get in touch.

Yours faithfully,



Georgia McColm

Graduate Planner