

Caewern House,
Dwr-y-felin Road,
Neath,

Design & Access
Statement

Project No. 2609

24 November 2022

DRAFT



Architecture
Civil Engineering
Structural Engineering
Urban Design
Transport

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Section 1: Introduction

1.1 Introduction

This Design Statement has been prepared by Spring Design in support of a Full planning application for the following application site:

Caewern House, Dwr-y-Felin, Road, Neath

This document has been prepared in accordance with the recommendations of Revised Technical Advice Note 12 - Design (TAN 12) March 2016, which sets out the key design objectives for Wales and provides guidance on preparing Design and Access Statements and it is to be read with the drawings & reports that form the overall proposal.

The role of this document is therefore to provide a communication tool showing that the objectives of good design set out in TAN 12 have been considered from the outset of the development process. It is also intended to assist the Local Authority, the local community and other stakeholders by clearly setting out the many factors that must be considered and reconciled in order to achieve good design, thereby clarifying understanding of the design process.

These factors include not only context, character, scale and density but also how the proposals respond to considerations of movement, community safety, inclusivity and sustainability.

Section 2 of this Design and Access Statement expands upon the policy context for this document and the associated planning application.

1.2 Design Team

Applicant(s):

Linc Cymru

Planning Consultant & Agent

Amity Planning

Architect & Urban Designer

Spring Design

Civil Engineer

Spring Design

Landscape Architect

Tir Collective



Section 2: Planning Policy

2.1 Planning Policy Introduction

The planning policy framework for the determination of this application is provided by the content and scope of National Planning Policy, which is contained within the tenth edition of Planning Policy Wales (PPW) and its associated Technical Advice Notes (TANs), together with the Local Planning Policy and its supplementary planning guidance.

2.2 Planning Policy Wales

National planning policy is contained within the tenth edition of Planning Policy Wales (PPW), published by the Welsh Government in December 2021. PPW is supported by 21 topic-based Technical Advice Notes (TANs), which are also relevant. PPW is the Welsh Government's principal planning policy document, setting out the context for sustainable land use planning policy, within which Development Plans are prepared and developed. Section 3.17 of PPW relates to design and access statements (DAS) discussing that a DAS should communicate what development is proposed, demonstrate the design process that has been undertaken and explains how the objectives of good design and placemaking have been considered from the outset of the development process.

2.3 Well-being of Future Generations Act (2015)

The Well-being of Future Generations (Wales) Act came into force in 2015 and seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act puts in place seven well-being goals in order to make sure that everyone works towards the same vision. The well-being goals are set out separately in the Planning Statement.

2.4 Technical Advice Notes

This application has been prepared in deference to the latest version of TAN 5: Nature Conservation & Planning; TAN 12: Design, which was updated in March 2016, TAN 18: Transport and the suitability of the proposals in this design context are demonstrated in this Design and Access Statement.

2.5 Active Travel (Wales) Act 2013

The intention of the Act is to promote continuous improvement of facilities for pedestrians and cyclists. The manner in which the proposals respond to the Act are set out in sections 3.4, 5.2.1, 5.2.4 and 5.5 of this Design and Access Statement.

2.6 Design and Access Statements in Wales (April 2017)

This guidance document sets out the requirements for a DAS, the benefits of preparing a DAS and some of the pitfalls that should be avoided when preparing the document. Section 5 of this document provides guidance on what to include in a DAS and how to communicate the proposals.

2.7 Neath Local Development Plan

The site is subject to the following designations within the adopted Local Development Plan:

- Within the defined Development Limits of Neath (Policy SC1)
- Categorised as a “Town” within the Settlement Hierarchy (Policy SP3 - 3.0.11)

The following policies are relevant to the proposed development:

Policy SC1 – Settlement Limits

- 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.

Policy SP7 – Housing Requirement

In order to deliver the 7,800 new dwellings required to meet the economic-led growth strategy, provision will be made for the development of 8,760 additional dwellings between 2011-2026 including a 12.31% flexibility allowance.

The supporting text to Policy SP7 identifies that, of the 8.760 dwellings required over the Plan period, it is anticipated that 825 of these would comprise of Large Windfalls (i.e. unallocated, previously developed sites of more than 10 dwellings).

Policy SP8 – Affordable Housing

Identifies that provision will be made to deliver 1,200 affordable housing units within the authority area over the Plan period.

Policy SP 10 Open Space

Provision will be made to ensure that all residents have access to adequate open space through the following measures:

1. Ensuring that new development addresses local needs;
2. Retaining and protecting existing open space.

Policy OS1 – Open Space Provision

Where there is a quantitative deficiency in outdoor sport, children's play, informal space or allotments, provision will be sought, including the requirement for maintenance, in conjunction with all new residential developments of 3 or more dwellings, based on the following standards:

Open Space	Standard
Outdoor Sport	1.6 hectares per 1,000 population
Children's Play	0.25 hectares per 1,000 population
Informal Space	0.55 hectares per 1,000 population
Allotments	0.19 hectares per 1,000 population

Policy BE1 – Design

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 place. Proposals will only be permitted where all of the following good design criteria are satisfied, and any proposed scheme compliments the existing character of the site.

Policy TR2 – Design & Access of a New Development

Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 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;
- 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;
- The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;
- Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.

2.8 Supplementary Planning Guidance

Relevant Supplementary Planning Guidance includes:

- SP20 Parking Standards (July 2017)
- AH1 Affordable Housing (October 2016)
- I1 Planning Obligations (October 2016)
- EN6 Biodiversity (May 2018)
- EN8 Pollution (October 2016)
- BE1 Design (July 2017)
- OS1 Open Space & Green Space (July 2017)

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Section 3: Appraisal

3.1 Site Assets & Resources

Located in an existing residential neighbourhood in Caewern, 1km North-West of the Neath town centre. Caewern House was most recently used as a respite care home for older people, this closed in 2019 and the site has been unused since. Unauthorised entry to both the site and building has caused notable damage. Since acquisition by Linc Cymru, the site and building has been secured, which has been well received by surrounding residents.













The site had previously been subject to a refused planning application (ref. P2016/0649) submitted in Jul 2016 and decided in Nov 2018. The application sought to provide 8 No 1&2 bed apartments in the old house and the construction of 2 detached buildings to provide 7 No. 1 bed apartments & a 2 bed Bungalo. The application also included removing poorly considered 70/80s extensions to Caewern house.

The site is bounded by predominantly residential development on all sides. Only the residential home to the west of the site entrance stands apart.





Key

-  Site boundary
-  Access - vehicular
-  - pedestrian
-  Dense hedgerow / shrub
-   Sun path - summer
-   - winter
-  Views - near
-  - middle
-  - long
-  Overlooking potential

▶ The site is 0.7Ha and falls from North to South, resulting in the entrance road climbing up to the existing house.

The site has been disused for approximately 2 years since the closure of the Elderly care home. At time of writing the site was being cleared of excessive scrub growth and unsafe trees. None of the trees are subject to Tree Preservation orders and are categorised at best as B. A tree survey has been undertaken and will be part of the planning submission.

Views out of the site are restricted by the existing trees and hedge growth, however views to the south / south east towards Neath town should be available on clearance.

The site is located approximately 1km East of River Clydach and ~500m North-West of River Neath. A culvert runs along the North-East boundary. NRW flood maps do not identify the culvert as presenting flood risk to the site or surroundings. The site is located within a "very low risk" area as identified by the NRW website (accessed 23/11/2022).

WDQR 2021 requirements for the development state that EPC A standard must be achieved. The site is able to accommodate solar panels to each property, care will be taken to minimise shadowing from the existing trees and maximise its output.

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3.2 Character & Legibility



Plas Bryn Rhosyn Residential Care Home on Dwr y Felin Rd.



Plas Bryn Rhosyn Care home façade along the site entrance road.



Much of the surroundings to Caewern House is residential in character. Travelling south (toward Neath centre) approximately 1km leads into larger retail / commercial properties and the A465 dual carriageway.

The surrounding residential properties appear to be mostly of post war construction with smaller infill developments of houses and flats occurring in later decades.



3 No Bungalows opposite the site entrance. Caewern Lodge to the south of the entrance road.



Examples of earlier construction appear as individual properties intermixed within the post war buildings. Smaller pockets of earlier development appear nearer Neath Centre, radiating from Neath Castle.



Twyn Teg street south of site, culminating in Twyn Teg House - flats



At the site entrance we are presented one of two larger modern developments in the immediate area. Located to the North of the site, Plas Bryn Rhosyn Residential Care Home is large in plan but seeks to address the scale of surroundings with domestic scale features



Caewern Community centre on Heol Illtyd.c



Typical examples of houses along Heol Illtyd and Heol y felin. Returning onto Dwr y Felin Road with photo above right.



Examples of 1930s semi detached and 1960/70s detached dwellings on Dwr y felin Road



On Twn Teg Street (to the sites south) the scale returns to semi detached / link dwellings or flats culminating in the most recent development of flat dwellings. This is clearly much more monolithic in scale with balconies to each flat. TI does however follow the material palette of brick and render in the surroundings.

Continuing Northward on the sites eastern boundary one encounters the Caewern Community centre, constructed of Concrete post and planks. This is quite the departure from the local vernacular. This Northern area comprises much of the local style. With Simple, flat-fronted facades generally without bay windows. Simple roof forms with occasional dormers. Generous front and rear gardens defined by brick boundary walls. Most properties are finished in render, with

white, pebble dash and brighter colours combining to provide variety, along with the use of brick and stone. Concrete stone surrounds are used to define doorways & windows.

Returning on to Dwr y felin road provides the greater variety in construction style. Some very pleasant 1930s semi detached houses about later 60/70s semi detached and detached dwellings. One of note is the Victorian Detached property on Heol Glynderwen, which sits in contrast to the rest.

3.3 Movement & Access



The site is well connected to the road and pedestrian networks. Dwr-y-felin road provides the only vehicle access. Through public consultation it was established that the pedestrian link highlighted above in yellow is important to the local area. Providing a much-needed link between Heol Illtyd and Dwr y Felin road. A bus stop is also located at the entry of the site, further emphasising the importance of this link. It was also noted in public in consultation that the route was less desirable at night due to shading from large trees and lack of light. Prior to site acquisition by Linc Cymru, many of the boundary fences were in disrepair, permeability of the site as a result significantly increased as well as antisocial behaviour. The site has been secured by Linc Cymru, this has been welcomed by the surrounding residents. It is likely that this impermeability will be retained for Secure by design matters, but improvement of the current pedestrian routes is a priority.

3.4 Adaptability & Diversity

Considering the surrounding properties, a residential development or development of that scale and amount is preferable on this site.

The site offers opportunities to:

- Improve connectivity & pedestrian safety between Dwr y felin road and Heol Illtyd.
- Integration of existing landscape assets into the scheme, so that they provide meaningful public amenity value and can be managed. Enhancement of current landscape with selective planting is also proposed.
- Improve the entrance to site and access road, including visibility in access and egress of site.
- Deliver a range of new and adaptable flat homes for contemporary living that can accommodate a diverse a demographic profile.

The existing building:

- Has extensive damage due to vandals.
- Has been left in disrepair and poorly maintained for some time.
- Has the potential to be modified into modern living units, however the later additions to the north are not suited to residential development. This is evidenced from the previous application. However, given the existing condition, it isn't financially viable to do so.

Section 4: Involvement

4.1 Community Engagement

A public consultation meeting was undertaken by Planning Aid Wales in the local community centre on Heol Illtyd (North-East of the site)

The public meeting consulted with residents of

- Heol Illtyd
- Dwr y Felin Road
- Heol Glynderwen
- Lon Brynteg
- Heol y Felin

This was treated as an informal Pre Application Consultation due to previous planning history of the site being sensitive to local residents. As a result of this consultation aspects of the proposals have been amended.

These amendments have now been incorporated into second Pre Application consultation which began Friday 18 November 2022. This will run for the prescribed period, results will be considered prior to the submission of the full planning application.

4.2 Pre-Application Discussions

Section 5: Response to TAN12 Objectives of Good Design

5.1 Access

The objective in respect of Access, as defined in TAN 12: Design (March 2016), is as follows:

- *“Ensuring ease of access for all by adopting inclusive design principles that deliver adequate provision for all people including those with mobility impairments, sensory impairments and learning difficulties.”*

The way the design solution will achieve this objective is outlined in the points below.

- The proposed development has been designed from the outset to address the accessibility needs of all people who may use it by incorporating the standards required by the Building Regulations Approved Document Part M 2004.
- In addition, access to all affordable and intermediate rent homes has been designed in accordance with the following Lifetime Homes Criteria in order to ensure that access to the building is possible for the widest range of people:
 1. Parking width
 2. Approach to dwelling from parking
 3. Approach to all entrances
- These standards, which will be an integral part of the development, will be designed to ensure that the development is robust enough to adapt to varying contexts and requirements of inclusiveness as the demographic profile and needs of residents and visitors changes through time.
- The practical access needs of delivery and emergency vehicles are met by a road layout that is to be fully compliant with Cardiff Council highway standards.
- Car parking has been allocated in accordance with adopted Neath-Port Talbot supplementary planning guidance, so that all 1 bedroom properties are provided with a maximum of 1 car parking space.



- Wherever possible, car parking has been designed to be as close as possible to the entrances of proposed flats in order to ensure easy access to accommodation for occupants and visitors, including those whose mobility may be limited.
- Parking space sizes are designed in compliance with adopted Neath-Port Talbot supplementary planning guidance and with the requirements of Lifetime Homes.
- All dwellings will have a path and views over the driveway providing a safe and level route from the highway to the principal access. Gradients for level access routes will be no steeper than 1:20 and a minimum of 900mm wide, in accordance with AD Part M paragraphs 6.11 to 6.13.
- Because the objective of ensuring ease of access for all has been considered from the outset, it is only one building which will require steps to enter it, these steps will be designed and constructed in accordance with AD Part M paragraphs 6.16 to 6.17 so that;
 - Flights rise max. 1.8 m between landings
 - There will be top, bottom and intermediate level landings at least 900mm in length
 - Tread nosings will conform to Approved Document M Diagram 27
 - The rise of each step will be uniform & between 75mm and 150mm
 - The going of each step will be uniform and at least 280mm
 - Where the flight comprises 3 or more risers, it will be provided with a continuous, grippable handrail profile set at 850-1100mm above the pitch line of the flight and extend 300mm beyond the top and bottom nosings.

5.2 Character

The objectives in respect of Character as defined in TAN 12: Design (March 2016), are as follows:

- *"Sustaining or enhancing local character"*
- *"Promoting legible development"*
- *"Promoting a successful relationship between public & private space"*
- *"Promoting quality, choice & variety"*
- *"Promoting innovative design"*

These objectives are to be achieved by responding to:

- *"Landscapes and townscapes, culture and biodiversity"*
- *"Locally distinctive patterns and forms of development"*
- *"Existing buildings, infrastructure, urban/rural landscape and public art"*
- *"Clear boundaries and established building lines"*
- *"Appropriateness of uses and the mix of uses and densities"*
- *"Easily recognisable and understood features and landmarks"*

5.2.1 Landscape Design

The design proposals will provide safe and secure private garden areas for the residents of the proposed development in addition to reinforcing existing landscape assets by placing them at the centre of the public realm proposals.



This strategy will ensure that;

- The character of the new street is defined by landscape design, as opposed to highway infrastructure
- Trees and landscaping are located where they will provide maximum public amenity value and, therefore, are likely to be retained in perpetuity
- Public amenity areas where children are likely to congregate and play are well-overlooked by new properties
- Large trees in rear gardens are omitted wherever possible to avoid the future threat of pressure to fell by new and existing residents
- The relationship between new and existing landscape features is carefully considered such that development density is not compromised
- Existing and proposed Green Infrastructure will be managed so as to create and sustain new habitats, thereby enhancing long term biodiversity

In the long term, this sustainable landscape strategy will continue to provide and enhance the public amenity & biodiversity value historically offered by the existing landscape assets of the site.

In order to demonstrate the feasibility of the overall landscape design strategy, detailed landscaping proposals which use appropriate planting to enhance privacy, security, amenity and biodiversity are described separately and submitted in support of this application.

5.2.2 Scale

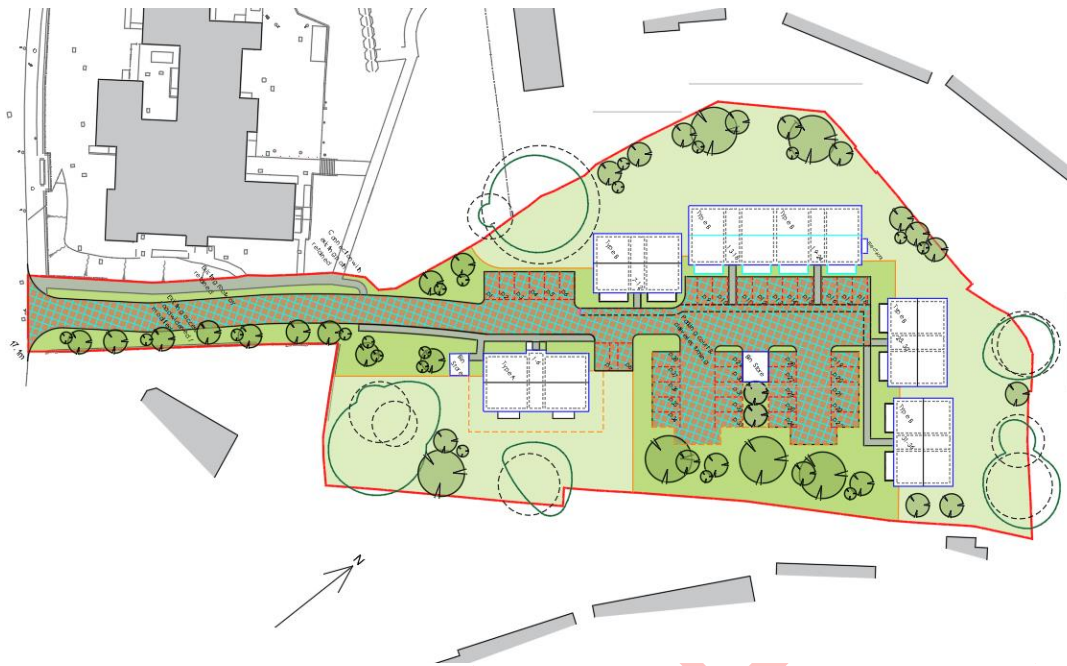
The design has been developed to integrate its scale with that of the local context and therefore consists of 3-storey apartment buildings containing 6 apartments each.



Careful attention has been paid to ensure that the proposals do not dominate those surrounding the site. Placement of the units responding to the surrounding buildings and the topography creates a complimentary mass. Combined with the use of appropriate off-set distances within the site, negates any adverse impact on privacy, daylight or sunlight, whilst the site microclimate will be suitable for the intended use.

The attractiveness and safety of existing rear gardens to surrounding properties will be enhanced by this residential development. Providing natural surveillance to all fronts, rears and public open spaces.

5.2.3 Amount



The proposed site development layout has been developed to demonstrate how the following principles can be achieved.

- The layout illustrates that 36 total No of Flats is suitable and achievable within the site area.
- A units that are social rent comprise and respond to both the policy requirements of, and local need identified by, Neath-Port Talbot Council.
- The inherently robust nature of housing designed in accordance with WDQR 2021, which amongst other guidance incorporates both the Welsh Government Development Quality Requirements and the Lifetime Homes standards will ensure that the development can anticipate potential change in the make-up and needs of occupiers, thereby facilitating future diversity both within the development and in the wider locality.
- The form of development makes efficient use of the available land on this site by integrating landscape and townscape strategies to maximise development zones whilst retaining suitably & safely located areas of public amenity space and landscape infrastructure.
- The proposal also maximises the provision of accommodation whilst providing sufficient private amenity space in accordance with Welsh Government Development Quality Requirements. By fully integrating the principles of these standards into the design solution, the proposals will safeguard quality of life in both the short and longer term.

5.2.4 Layout of Development

The proposed layout has been developed to demonstrate how the following place-making aims and principles can be achieved:

- The desire to meaningfully address Dwr y Felin Road, Heol Illtyd and Twyn Teg Road has resulted in the inward facing development which doesn't overbear the rear gardens of the surrounding properties.

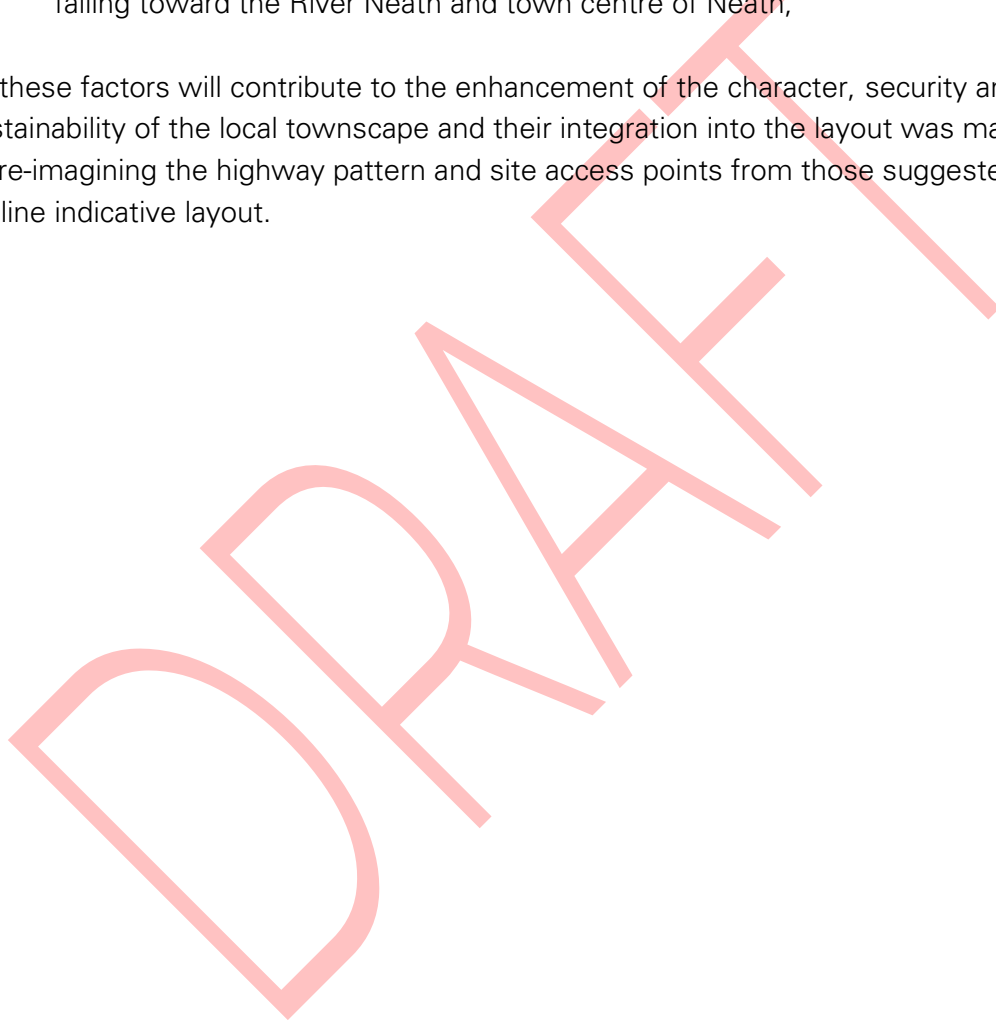


- The desire to reinforce the existing pedestrian routes through the site and create an improved access to and from the site through both visual and physical permeability between Dwr y Felin road and Heol Illtyd



- The desire to reinforce a strong sense of place within the new residential development by introducing a legible road pattern in which the termination of the vista leads one to the centre of the site, whether the journey is being experienced as a pedestrian, as a cyclist or as a motorist.
- The desire to ensure that parking areas and public routes within and bordering the site will benefit from natural surveillance through appropriate orientation of properties.
- Orientation of the proposed buildings and the internal living spaces southwards to benefit from solar gain and address the surrounding context which sit approximately 40 degrees from south. This appears to be a response to the topography of the area, falling toward the River Neath and town centre of Neath,

All these factors will contribute to the enhancement of the character, security and sustainability of the local townscape and their integration into the layout was made possible by re-imagining the highway pattern and site access points from those suggested by the outline indicative layout.



5.2.5 Appearance

The appearance of the proposed buildings derives from a straightforward contemporary reinterpretation of familiar forms, using traditional materials and construction technology.



The principal characteristics of the appearance of the proposals are:

- The use of low maintenance finishes to ensure robustness and longevity
- Clay facing brick elevations with panels of render panels to balconies and window surrounds
- Pitched roofs of simple geometry in concrete slates with occasional examples of roofs incorporating dormers
- UPVC windows with simple, contemporary subdivision that allow excellent natural light and enhance the feeling of internal spaciousness on smaller properties
- UPVC boxed eaves and verges
- The use of balconies to add interest and animation to elevations, these also provide solar shading
- The use of window surrounds, and hoods to provide solar shading
- Well considered and balanced elevational compositions employing symmetry and repetition to create rhythm and harmony in street scenes

The architectural language is at once contemporary and familiar and, married with robust, high quality materials, is designed to deliver safe, attractive and sustainable new neighbourhoods that will not only complement the place-making aspirations of the layout but which will also associate the Cardiff Living brand with the creation of diverse, affordable yet aspirational places in which to live.

5.3 Community Safety

The objectives in respect of Community Safety, as defined in TAN 12: Design (March 2016), are as follows:

- *“Ensuring attractive, safe public spaces”*
- *“Security through natural surveillance”*

These objectives are to be achieved by promoting:

- *“High quality in the public realm”*
- *“Routes which are fit for purpose and will provide opportunities for safe physical activity and recreation to meet the needs of all members of society”*
- *“A sense of ownership and responsibility for every part of the development”*

The development pattern of the proposals ensures continuity of enclosure, active frontages and legibility, which will contribute to a safer built environment.

Front doors are clearly legible and the external areas leading to them are clearly defined. In addition to clearly defining the distinction between public and private realms - and therefore reducing potential conflicts in uses - these features will provide defensible space and will promote a sense of ownership and responsibility.

New public routes will benefit from appropriate levels of street lighting, whilst the orientation of the dwellings means that parking areas and footpaths will benefit from natural surveillance in order to protect people and property by contributing to the safety of public spaces and routes.

Natural surveillance of existing residents car parks to the North and South of site will be improved by the proposed placement and orientation of the buildings by providing natural surveillance.

5.4 Environmental Sustainability

The objectives in respect of Environmental Sustainability, as defined in TAN 12: Design (March 2016), are as follows:

- “Achieving efficient use & protection of natural resources”
- “Enhancing biodiversity”
- “Designing for change”

These objectives are to be achieved by incorporating:

- “Sustainability measures to reduce the environmental impact associated with buildings and minimising the demand for energy (low and zero carbon sources), water, and materials and creation of waste”
- “Approaches to development which create new opportunities to enhance biodiversity”
- “Adaptable and flexible development that can respond to social, technological, economic and environmental conditions/changes (e.g. the current and future effects of climate change) over time to minimise the need to demolish & rebuild”

The design responds to its townscape setting and contributes to biodiversity and local environment by achieving the objectives of Access and Character, including Landscape Design, Scale, Amount, Layout and Appearance, in order to improve habitat connectivity & integrate with open spaces as described in sections 5.1 and 5.2 of this document.

Sustainable Building and Energy Vision

The Welsh Government has identified Climate Change as the globally defining challenge of our time and has been pro-active in passing legislation such as the Environment (Wales) Act and the Well-Being of Future Generations Act in order to establish a legislative context within which detailed policies and guidance can be developed to meet it.

As part of this response, both *Planning Policy Wales 11* (PPW11) and *Prosperity for All: A Low Carbon Wales* (PFA) clearly identify that “The Welsh Government’s highest priority is to **reduce demand** wherever possible and affordable.”



PPW11 Figure 10: Energy Hierarchy for Planning

with the **reduction of energy demand** clearly identified at the very top of the hierarchy.

It is important to note that whilst support for low carbon technology and energy generation is, rightly, strongly supported by PPW11, **renewable energy generation** lies in the middle of the overall energy hierarchy, between the need to **use energy efficiently** and the need to **minimise the carbon impact of other energy generation**.

For development and the creation of new buildings, this focus on reduction of energy demand rather than renewable forms of energy may at first seem counter-intuitive but in reality, it ensures that proper attention is paid to the improvement of building fabric and energy efficiency, rather than off-setting inefficient building design through the use of bolt-on renewables. In short, it should be the driver to design and build better now, allowing for the use of renewables to improve performance in the future as a way of ensuring climate resilience.

However, the energy efficiency standards embodied by the Building Regulations in Wales do not reflect this policy aspiration and, instead, allow exactly the sort of off-setting through use of renewables described above. This will remain the case following the implementation of the proposed changes that were subject to recent public consultation.

However, in recognition of this misalignment of Planning policy and Building Regulations, Welsh Government’s recently published Welsh Development Quality Requirements (July 2021) stipulate the following for all new social housing developments:

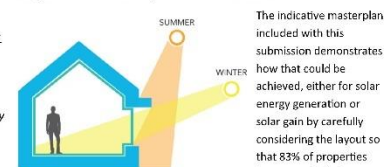
New homes must meet energy and decarbonisation requirements which consists of:

1. *Achieving EPC A (SAP92 or greater) through the minimum fabric standard set out in “Appendix E” – Elemental specification for the DER/TER, within the Building Regulations Approved Document Part L Wales 2020 and by not using fossil fuel fired boilers to provide domestic hot water and space heating.*
2. *Alternative proposals will be acceptable where it can be demonstrated by independent certification that the building’s energy demand is reduced in accordance with the Energy Hierarchy for Planning in Welsh Government’s Planning Policy Wales.*
3. *An assessment of overheating risk based on the CIBSE TMS9 methodology (for “Category 1 buildings”), which demonstrates compliance with the CIBSE TMS9 compliance criteria, for the following dwelling types:*
 - *Apartments/Flats.*
 - *Houses which do not have two or more parallel aspects to facilitate cross-ventilation.*

Whilst UW-IA is already committed to low-carbon heating using energy efficient air source heat pump technology and super-insulated and air-tight properties on all its new developments in accordance with paragraph 1, above, paragraph 2 suggests the possible adoption of measurable standards such as the AECB (Association for Environment Conscious Building) Standard, Passivhaus Low Energy Building Standard or Passivhaus Classic Standard, the latter of which is proven to reduce the cost of heating homes by around 90% by focussing on reducing energy demand in accordance with PPW11.

It is important to understand that in order to optimise opportunities for solar energy generation (a likely requirement for paragraph 1, above) and solar gain (a requirement for paragraph 2 above) orientation of properties will become critical to delivering low energy social housing and this is further reinforced by the requirement of paragraph 3, above, for which correct orientation is also a critical factor and must be considered at early design stage.

Therefore, our vision for development of the proposed candidate site is to fully embrace the aspiration of PPW11 to reduce energy demand by demonstrating that the proposed application site can accommodate a development that could be designed and constructed to a measurable, recognised standard that is proven to reduce demand.



The indicative masterplan included with this submission demonstrates how that could be achieved, either for solar energy generation or solar gain by carefully considering the layout so that 83% of properties have a south facing aspect, which is also the easiest to manage in terms of solar shading and summer overheating.

In conclusion, in reference to Sustainable Buildings paragraph 5.8.1 of PPW11 states;

“The planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.”

Clearly, provision of a site layout masterplan that inherently facilitates low energy building strategies that in turn are proven to reduce energy demand of new development should be considered as satisfying the criteria for planning system support set out in paragraph 5.8.1 of PPW11 and a mechanism for its detailed delivery should be possible through the planning process.

With the integrated design approach to Sustainable Urban Drainage Systems (SuDS) the proposals demonstrate a clear commitment to achieving the aims set out in TAN 12, as follows:

- To use sustainable materials with low environmental impact (embodied energy) that are sourced sustainably (i.e. Forestry Stewardship Council timber) as well as maximising the use of used, reclaimed and recycled materials.
- To employ a sustainable approach to water in terms of its supply (rainwater harvesting/flow restriction), demand management (use efficiency) and drainage (SUDs) and its effect on the local water table
- To deal with waste management both during and after construction (re-use & disposal), including the provision of appropriate facilities for sorting, storing and recycling of waste in buildings and across the site
- To demonstrate climate resilience by taking into account the climate the development is likely to experience over its lifetime by managing & minimising climate change effects (e.g. extreme temperatures)

5.5 Movement

The objective in respect of Movement, as defined in TAN 12: Design (March 2016), is as follows:

- *“Promoting sustainable means of travel”*

This objective is to be achieved by maximising:

- *“Safe and clear connections*
- *“The potential to cycle, walk and use public transport safely, and reducing the reliance on the car”*
- *“The connection to the existing transport infrastructure by integrating development with existing footpaths, cycle ways and public and private transport infrastructure”*
- *“The integration of different transport types whilst minimising the adverse effects on the network”*
- *The ease of movement to, from and within the development for sustainable forms of transport by creating a safe and attractive environment”*
- *The provision of on-site facilities for sustainable forms of transport”*

The proposal creates clear connections from the site to the streets beyond, thus contributing to the improvement of and integration of the site within the pedestrian, cycle and vehicular movement framework of the locality.

The servicing requirements for transporting freight required during and after construction are met by the existing highway infrastructure.

Ease of pedestrian and cycle access to the Neath Town, together with the proximity of bus services to both the district centre, will contribute to reduced reliance on the car as a means of transport.

Section 6: Summary & Justification Statement

This Design Statement explores in detail how proposals will deliver a well-designed residential development that is clearly integrated with the existing residential neighbourhood and highway network and which fully complies with the intentions set out in both local and national planning guidance.

The key place-making concepts driving the design proposals can be summarised as follows:

1. Creating a strong sense of place through high quality residential architecture, materials and a robust, permeable and legible layout that clearly defines the private and public realms
2. Resolution of the relationships with both Heol Illtyd and Twyn Teg properties with attractive and welcoming properties that do not overbear.
3. Placing landscape design at the heart of the proposals by retaining and augmenting existing landscape assets so that street is characterised by green infrastructure rather than by roads and parking
4. Maximising and strengthening pedestrian safety and connectivity within and beyond the site
5. To provide active frontage, security, natural surveillance and both visual and physical permeability within and along the edges of the proposed development to ensure a safe and sustainable place to live.



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