

Date: 26th March 2021

Our Ref: 20.301

Jane Engel
Planning Services
Blaenau Gwent County Borough Council
Civic Centre
Ebbw Vale
NP23 6XB

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

Tel: 02920 732 652
www.asbriplanning.co.uk

Dear Jane,

Town and County Planning Act 1990 (As Amended)
Proposed 5 bedroom supported living unit at Maes y Dderwen, Charles Street, Tredegar
Planning Application Ref: C/2020/0282

Asbri Planning is appointed as planning agent to Shaw Healthcare in respect of the above planning application for a proposed 5 bed supported living unit at Maes y Dderwen, Charles Street, Tredegar. There is an existing 24 bed care home on the Maes y Dderwen site which provides nursing, dementia and schizophrenia care and which is owned and operated by the applicant.

The application was heard at Blaenau Gwent County Borough Council Planning Committee on 4th March 2021. The application was recommended for approval. However, local members proposed an amendment to the recommendation and resolved to refuse the application. It is therefore being presented again to Committee on 14th April for the decision to be confirmed.

Notwithstanding, this letter will address the concerns raised by members from a strictly planning perspective which are as follows:

- A care facility being sited next to a public house;
- The impact of the development on highways safety and parking provision;
- Number of deliveries associated with the proposed development;
- The impact of the development on the adjacent Public Right of Way;

Each of the above will be discussed in turn below:

A care facility being sited next to a public house

One concern raised by local members was the fact that the proposed property would be sited in close proximity to a public house (the Coach and Horses). It should be emphasised that there is an existing care facility (Maes y Dderwen) already situated within close proximity to the pub which cares for persons with similar care needs to those which would occupy the proposed development. The application is therefore not introducing a new use to the area.

On the southern elevation, nearest to the public house there are no windows to habitable rooms, indeed there is only one window on the ground floor which serves a staff room and one on the first floor landing. As such, there is limited opportunity for residents and patrons of the pub to engage with one another. The window to the staff room will increase natural surveillance of the adjacent footpath closest to the pub.

Notwithstanding, the applicant is aware of the concerns held by members and is willing to work with the Local Authority to appease those concerns. This could potentially be achieved via appropriate screening of the front elevation by natural landscaping or fencing. In addition, the southern elevation could be fitted with additional (but sensitive) lighting and CCTV cameras which would reduce the potential for anti social behaviour.

In addition, as a registered care provider in Wales, Maes y Dderwen is registered with the Care Inspectorate Wales, which confirms that their national regulatory body is satisfied with the existing facility being located next to a public house. Finally, Maes y Dderwen is one of few facilities in Wales that has accreditation for all four ISO Certificates – 9001, 14001, 27001 and 45001.

The impact of the development on highways safety and parking provision

It was raised during the debate that Charles Street is subject to a high number of traffic collisions and therefore, the proposed development despite only requiring parking for staff, will intensify the issue. Notwithstanding, a review of the crashmap database (<https://www.crashmap.co.uk/Search>) reveals that there is not a significant highway safety concern along Charles Street, with no recorded incidents in the period January 2016 to December 2020. As illustrated on the map extract below:



Notwithstanding the evidence above, the proposed development will not result in a material increase of vehicular trips associated with the Maes y Dderwen facility as a whole which could lead to highway safety concerns. Indeed, the only vehicular trips associated with the proposed development will be made by staff and visitors.

As such, the evidence confirms that there is not a highway safety problem along Charles Street and the proposed development will not result in a material increase in vehicular trips which would raise highway safety concerns.

In respect of parking provision, it is in line with the adopted Blaenau Gwent "Access, Car Parking and Design" Supplementary Planning Guidance which requires 1 space per resident staff, 1 space per 3 non-resident staff, and 1 space per 4 beds. Three spaces are provided with this new facility, to accommodate the 2 carers/staff and 1 visitor space, as per the SPG requirement of providing 1 visitor space per 4 beds. These three additional spaces are provided within the red line of the application site.

It must be noted that there are 10 car parking spaces in the existing Maes y Dderwen car park serving 24 beds in the main facility. This is a ratio of 0.42 spaces per unit. The new facility will provide 5 additional units and 3 additional car

parking spaces, equating to 29 units and 13 spaces. This results in an improved ratio of 0.44 spaces per unit, which is a betterment when compared with the existing parking provision.

Notwithstanding the improved parking ratio, the facility provides sufficient car parking **in its own right** and these three spaces are contained within the red line of the application site, and can be secured for the sole use of the new replacement facility if the highway authority requires it, although it is the applicant's view that this won't be necessary and that increasing the shared provision across the site is a better option.

The Authority's Highways Officer did not raise an objection to the proposed development and confirmed that the level of parking is acceptable.

The possibility of residents with mobility concerns who own cars or mobility scooters occupying the development was discussed at planning committee which would result in an under provision of parking. It should be emphasised that the occupants of the proposed development will have complex care needs and are unable to drive, therefore will not have access to a car. Whilst the C3(b) use class covers a range of care needs, this is a bespoke development designed to cater for persons with specific care needs. It therefore is not suitable for persons with significantly different care needs. For example, it cannot cater for those with mobility concerns as there is no downstairs bedroom, wet room or lift provision. Therefore it will not be occupied by persons with mobility concerns who would have access to cars and mobility scooters, instead it will house people with care needs who do not have access to a car.

The impact of the development on parking provision is therefore acceptable.

Number of deliveries associated with the proposed development

In terms of traffic generation, the existing facility has food deliveries on Mondays, Thursdays and Fridays and refuse on Wednesdays as per the existing arrangement for the rest of Charles Street. The development will not result in an increase to this nor will it require the relocation of the existing refuse compound. In addition, the other Maes y Dderwen facility previously situated on Charles Street has been relocated, as such, the deliveries previously associated with this facility have been removed from the traffic flow along the street. The new development will share the deliveries with the existing Maes y Dderwen facility, thereby reducing deliveries along Charles Street as a whole as many more deliveries can be shared. Notwithstanding, delivery vehicles will not be materially different to a Tesco delivery vehicle that serves domestic properties, which will likely drop off from 2020 levels as Covid restrictions ease.

The impact of the development on the adjacent Public Right of Way

A Public Right of Way runs outside, albeit parallel to, the southern boundary between the site and the Coach and Horses which provides access to Martindale Close. There were discussions during Planning Committee regarding the impact of the development on the public right of way. It should be emphasised that the footpath link lies outside the site boundary and therefore not within the gift of the application. The public right of way therefore cannot be impacted upon as a result of this application.

This was confirmed by the public rights of way officer who had no objection to the application.

Conclusion

To conclude, all considerations raised at planning committee have been addressed and there are no objections in terms of highways, design, noise, landscape, ecology, trees or public protection from technical consultees. Further, Maes y Dderwen is registered with the Care Inspectorate Wales, which confirms that their national regulatory body is satisfied with the existing facility being located next to a public house; this also applies to the new facility albeit

accreditation can only be obtained once it is built, and Maes y Dderwen is one of few facilities in Wales that has accreditation for all four ISO Certificates – 9001, 14001, 27001 and 45001.

It is therefore respectfully requested that local members overturn the committee resolution to refuse the application and approve the application in line with the Local Planning Authority's original recommendation for approval.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Pete Sulley". The signature is written in a cursive, flowing style.

Pete Sulley
Director

Enc.