

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

The Town and Country Planning (Development Management Procedure)
(Wales) Order 2015 (as amended)

HEAD OF ENGINEERING & TRANSPORT

HIGHWAYS OBSERVATIONS

PLANNING APPLICATION NO: 2/3/26/0526/00
APPLICANT: MR D. PHILLIPS
LOCATION: 9 HIGH STREET, CWMAVON, NEATH PORT
TALBOT, SA12 9BH
PROPOSAL: PROPOSED CHANGE OF USE OF PART OF A
GROUND FLOOR RETAIL UNIT (USE CLASS A1)
AND C3 DWELLING AT FIRST FLOOR AND ATTIC
TO A 4-BEDROOM HMO (USE CLASS C4) AND
THE ADDITION OF SOLAR PANELS TO THE
ROOF OF THE FRONT ELEVATION

The Highway Authority, in responding to the above application, provides the following substantive response:

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐

MY HIGHWAYS OBSERVATIONS ON THIS PROPOSAL ARE AS FOLLOWS:-

It is noted that the amended application contains no material changes in respect of highway matters. As such, our position remains that the proposal would result in increased parking pressure within an already constrained highway environment, together with the associated risks, which we consider would be further exacerbated by the proposed HMO.

However, having regard to the Inspector's findings in appeal *CAS-04873-M3Z9G2*, in which the Council's highway safety concerns were dismissed, we do not consider it reasonable to maintain a formal objection on highway safety grounds. Instead, we wish to place our concerns on record. Our position regarding the highway implications of the proposal remains unchanged and is set out in our previous appeal statement; however, rather than objecting to the application, we now submit these matters as concerns for consideration:

This statement sets out the Highway Authority's reasons for having concerns to the proposed change of use to a 4-bedroom House in Multiple Occupation (HMO) at 9 High Street, Cwmavon. The concerns are grounded in established local and national

transport policy, the characteristics of the surrounding highway environment, and the anticipated impacts of intensifying occupation in a location with existing constraints.

1. Highway Environment and Site Context

- 1.1. The site fronts High Street, a classified B-road in Cwmavon, a small town located north-east of Port Talbot with a speed limit of 20mph, a carriageway width of 5.4m and a partial footway provision width fronting both the site and the opposite side of the carriageway of approximately 1.7m. High Street also functions as a key bus route, carrying significant volumes of through traffic and public transport movements.
- 1.2. The building footprint occupies the full extent of its plot, leaving no external space and no scope whatsoever for off-street parking.
- 1.3. Surrounding streets, including High Street/Cwmavon Road, Ty'r Owen Row – with a carriageway width of 5.9m and a footway width of 0.6m at its narrowest, and Ty'r Owen Terrace – with a carriageway width of 3.8m and a footway width of 2.5m; are subject to Traffic Regulation Orders (TROs), including prohibition of waiting. These restrictions eliminate the possibility of lawful on-street parking for prospective occupants.
- 1.4. The site is located within Parking Zone 4 as defined by the *NPTCBC Parking Standards Supplementary Planning Guidance (SPG)*, an area where public transport provision is moderate and car ownership remains common, thereby increasing likely parking demand.

2. The Proposal

The application seeks permission for:

- 2.1 Change of use of part of a ground floor retail unit (A1) and first floor/attic residential (C3) to a 4-bedroom House in Multiple Occupation (C4), including solar panels.

This intensifies the residential occupancy of the building without providing any mitigating measures for parking, transport or servicing impacts.

3. Highway Safety Concerns

3.1 Absence of Off-Street Parking Provision

The *Supporting Statement* acknowledges the total absence of on-site parking but asserts: “*in the unlikely event that some residents do have access to a car, this would not result in a materially different impact on the local highway network compared with the existing residential use.*” This assertion is unsubstantiated - the lack of off-street provision conflicts with *Policy TR2* of the *Local Development Plan (LDP)*, which requires developments to:

- avoid compromising highway safety;
- provide appropriate parking;
- support access by a range of travel modes.

Given that the site is built to the extent of its boundaries, there is no possibility of accommodating parking on-site.

4. Impact on Surrounding Highway Network

Any demand for resident parking will be displaced onto nearby streets.
However:

- 4.1. The immediate highway network is already subject to extensive TRO restrictions that remove lawful parking opportunities.
- 4.2. Increased indiscriminate parking by residents or visitors is highly likely.
- 4.3. Such indiscriminate parking would obstruct the free flow of traffic on a classified road, compromise bus operations, and increase hazards for pedestrians and cyclists.
- 4.4. High Street's strategic function as both a classified route and bus corridor makes it particularly sensitive to obstruction.

5. Parking Zone 4 & Likely Car Ownership

The *SPG* confirms that in Zone 4, public transport availability is only moderate, meaning:

- car dependency remains high;
- developments are expected to meet typical parking standards unless there is strong justification otherwise.

No such justification has been provided. Conversely, existing evidence indicates that parking pressure is already present, as demonstrated by the extent of current TROs.

6. Conflict with Local Development Plan Policy

LDP Policy SP20 and *Section 5.4.1 (Transport)* clearly state that authorities should: “*Restrict development which would have an unacceptable impact on highway safety.*” The proposal conflicts with this requirement due to:

- intensified occupation without parking provision;
- increased pressure on an already constrained on-street environment;
- jeopardising the safe and efficient operation of the B-road and public transport corridor.

7. Summary and Conclusion

Based on the site constraints, local highway conditions, policies, and national guidance, the proposed HMO use at 9 High Street would:

- Provide no off-street parking, contrary to *LDP Policy TR2*.
- Generate additional parking demand in an area where TROs already prohibit on-street parking.
- Increase the likelihood of illegal or obstructive parking.
- Adversely impact the operation of a classified road and designated bus route.
- Result in a development that has an unacceptable impact on highway safety, contrary to *LDP Section 5.4.1*, *SP20*, *TR2*, and *NPTCBC's SPG*.

Therefore, the Highway Authority maintains its concerns.

Grounds for Concerns:

- Inadequate parking provision
- Increased risk to highway safety
- Adverse impact on the operation of a classified road and public transport route
- Conflict with *LDP Policies TR2, SP20, and Section 5.4.1*

NOTE TO APPLICANT

If any works are required within the highway, the written consent of the Highway Authority is required to be sought. This includes the placement of any skips, scaffolding, hoarding or any traffic management on the highway.

If any damage arises to the highway as a consequence of any works adjoining the highway, the damage will be required to be made good to the satisfaction of the Highway Authority. Failure to do so may result in the Highway Authority making good the damage and recovering any expenses reasonably incurred by them in so doing.

You should therefore contact the Highways Maintenance Unit of Neath Port Talbot County Borough Council at The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG FAO Gary Thomas (Tel No. 01639 686327) e-mail g.thomas3@npt.gov.uk to discuss any licenses or approval required. This is required to be undertaken before any works commence on the highway.

NOTE TO PLANNER

While we remain concerned about the highway safety implications of the proposal, the Inspector's dismissal of those concerns in appeal *CAS-04873-M3Z9G2* means it would not be reasonable to continue objecting on those grounds alone. We have therefore raised our previous concerns to place on record.

SIGNED: N. Evans DATE: 27/08/2026
pp HEAD OF ENGINEERING & TRANSPORT

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