



PLANNING, DESIGN AND ACCESS STATEMENT
PROPOSED CONVERSION OF THREE FLATS TO ONE 4-BED HMO
AND TWO 2-BED FLATS AT 27/28 ST JOHNS TERRACE, NEATH
PORT TALBOT

on behalf of
James Stevens

Our Ref: 1102.c
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Prepared by: JDE

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1.0 INTRODUCTION

1.1 Evans Banks Planning Ltd. has been instructed by Mr. J. Stephens to prepare a full planning application for the conversion of existing flats to one 4 bed HMO and 2 two-bed flats at 27/28 St Johns Terrace, Neath.

1.2 This Planning, Design and Access Statement therefore forms part of the submissions of the application to be considered by the Authority, and provides information on the following points:

- A brief description of the site and surrounding area
- A description of the proposed development
- Consideration of relevant local planning policy
- Accessibility
- Character
- Community Safety
- Environmental Sustainability
- Movement to, from and within the development

2.0 SITE DESCRIPTION

2.1 THE SITE

- 2.1.1 The application site (pictured below) relates to a domestic property currently consisting of three flats under construction, located between Neath Abbey and Skewen, Neath Port Talbot.



Photograph 1

- 2.1.2 The current building has 3 two bed flats: a two-bed flat on the lower ground floor, a two-bed flat on the ground floor and a two-bed flat on the first floor. The building is unique in design in the sense that it is a detached property situated on a road associated with several terraced properties.
- 2.1.3 The pedestrian entrance to the building is via the southern (front) elevation, which leads from St Johns Terrace. The direct vehicular access route to the property is gained via St Johns Terrace, although there are no formal parking measures in place. On-street parking is present, but away from the allocated crossing section.
- 2.1.4 A Non-Material Amendment (NMA) to Condition 2 (internal layout) of planning application P2017/0758 was granted in 2020 (ref: P2020/0237). This has been

incorporated into the current planning application proposal, which includes the side staircase for access the HMO.

2.2 THE SURROUNDING AREA

2.2.1 As detailed above, the application site lies between Skewen to the west and Neath Abbey to the east. It is positioned near Abbey Primary School as illustrated in Photograph 2.



Photograph 2

2.2.2 The properties existing on the same side as the street as the application site are generally of a similar design, as illustrated below.



Photograph 3

2.2.3 Notwithstanding the above, there is significant variance in property design and type on the opposite side of the road (identified in Photographs 3 and 4).



Photograph 4



Photograph 5

2.2.4 St Johns Terrace contains a mix of existing land uses, with a number located near to the application site. These include Blodau Florist Neath, Ridgway Florist Neath and Janela Shutters and Blinds.

2.2.5 The proposed development is located within walking distance (approx. 5mins) to Skewen where several other community facilities and local services are available. These include a convenience store, library, pharmacy, medical centre, and several takeaway outlets. The site is also located within walking distance (approx. 5mins) to Neath Abbey where several other amenities are available such as further

convenience store, a Greggs food outlet as well as a large Tesco Superstore (approx. 10min walk/3min drive).

2.2.6 In addition to the above, the area immediately surrounding the application site is very well served by public transport and other non-car modes of transport and links. With regards to bus travel, two bus stops are located adjacent to the application site, all served by regular services (listed below), providing regular access to the surrounding and wider areas of the County and beyond:

- 30
- 59
- 156
- 158
- 159
- X60

2.3 PROJECT DESIGN PARAMETERS AND PRINCIPLES

2.3.1 As a result of the local context and the aspirations of the Applicant for the property, the following design principles and parameters have influenced the design of the proposal subject of this planning application:-

- **Scale** – To retain the application building in its current and approved form, with no increase in its volume.
- **Design** – To largely retain the building's existing features and those approved by the aforementioned extant planning consent.
- **Access** – To utilise the existing means of access serving the site and include facilities within it for the promotion of sustainable means of transport to capitalise on the position of the site within the local context.

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The proposal is for full planning permission for the conversion of three 2-bed flats to a 4-bed HMO and two 2-bed flats. The following information should therefore be read in conjunction with the accompanying plans, drawings and associated supporting information.

Project Overview

- 3.2 The conversion will utilise the form of the existing building with little or no physical alteration. It also does not seek to alter the previously approved level of off-street car parking, but will make provision for promoting non-car modes of travel.
- 3.3 The proposal includes elements recently approved as part of an NMA, relating then to the provision of two bedrooms in the attic element of the building, together with the provision of an external staircase. All these elements will then relate to the proposed 4 bed HMO. The remaining two existing flats will then be retained and largely unchanged to those previously approved.

Internal Accommodation

- 3.4 The internal layout of the building will be largely unaltered to that previously approved. The application building will therefore consist of 1 two-bed flat on the lower ground floor, 1 two-bed flat on the ground floor, but a new 1 4-bed HMO consisting of the first floor and attic element.
- 3.5 All bathroom elements will have obscurely glazed units installed to ensure that there is no detriment to privacy to either future residents of the building or those of existing adjoining land uses.

External Finishes

- 3.6 The previously approved external finishes of the building will remain unaltered, which consists of rendered walls with a tiled roof. All fenestration units will be upvc in nature.

Drainage

- 3.7 All surface water and foul water will continue to be disposed of as existing, via connections to the public sewer.

4.0 LOCAL PLANNING POLICY

4.1 In terms of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the adopted development plan for the area within which the application site is positioned is the *Neath Port Talbot County Borough Council Local Development Plan (LDP)*.

4.2 On the basis of the above, the following policies are considered of particular relevance to the application proposal and so have been given full consideration in its preparation :-

- Policy SP3 – Sustainable Communities
- Policy SC1 – Settlement Limits
- Policy TR2 – Design and Access of New Development
- Policy BE1 – Design

4.3 In addition to the above, we consider the following ‘Supplementary Planning Guidance’ (SPG) produced by the Local Authority to be relevant to the application proposal, which has therefore also been given due consideration:

- Parking Standards (Oct 2016)
- Design (July 2017)

4.4 POLICY SP3 – SUSTAINABLE COMMUNITIES

4.4.1 Policy SP3 (*Sustainable Communities*) states that the delivery of “*sustainable, healthy and cohesive communities and the conservation of the countryside*” will be promoted by “*the identification of a settlement hierarchy that reflects the role and function of settlements*”. New development will therefore be steered towards the more sustainable locations of the county.

4.4.2 The proposed development is sandwiched between Skewen and Neath Abbey. Table 3.1 of the LDP ‘*Settlement Hierarchy for Neath Port Talbot*’ identifies Skewen as a District Centre, as the settlement has good transport links and a wide range of functions serving the immediate and surrounding communities. It is 2nd out of a 6-tier hierarchy, highlighting that it is considered to be a sustainable settlement by the Local Authority. Neath Abbey is then designated as a Large Local Centre, as it has adequate public transport links with clusters of one or more retail units and local services with one or more community facilities and employment provision.

4.4.3 In light of the above, the application site is clearly positioned well within the Settlement Hierarchy and will therefore promote sustainable development in adherence to the requirements of Policy SP3.

4.5 POLICY SC1 – SETTLEMENT LIMITS

4.5.1 The proposed application site is positioned within the settlement limits defined by Policy SC1 (*Settlement Limits*).

4.5.2 Policy SC1 states that “*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*”. With no change to the physical form or nature of application building it is considered that this development is proportionate in scale to its surroundings.

4.6 POLICY TR2 – DESIGN AND ACCESS OF NEW DEVELOPMENT

4.6.1 For developments to comply with Policy TR2 (*Design and Access of New Development*) proposals must adhere, as appropriate, to the requirements of four criteria. In the case of this application proposal we believe that all four are of relevance and an assessment of the application proposal against each now follows.

- 4.6.2 Criteria 1 requires that proposed developments do not “*comprise the safe effective and efficient use of the highway network*” and do not impact highway safety or create unacceptable levels of traffic generation. It is considered the site will not experience an increase in levels of traffic as a result of the proposed development, as the flow of traffic will be a replication of its existing use. The proposal therefore adheres to the requirements of the Criteria.
- 4.6.3 Criteria 2 requires that there are appropriate levels of parking and cycling facilities provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use. The matter of parking is discussed in detail under consideration of Policy below. In summary therefore, it is considered that the proposal adheres to the spirit of Criterion 2.
- 4.6.4 Criteria 3 requires that development is accessible by a range of travel means. The proposed development is accessible by road, bus, and pedestrian networks. The commercial centres of Skewen and Neath Abbey are easily also accessible by foot, car, or bus, ensuring therefore that the application proposal satisfies the requirement of the Criterion.
- 4.6.5 Criteria 4 requires a Transport Assessment and Travel Plan for developments likely to generate significant traffic generation. It is not considered that Transport Assessments and Travel Plans are needed, as the development is unlikely to create significant traffic generation.
- 4.6.6 In summary therefore, the application proposal fully adheres to the requirements of Policy TR2.

4.7 POLICY BE1 - DESIGN

- 4.7.1 Design is key to the Local Authority as highlighted by Policy BE1 (*Design*). The policy states that all development proposals must be of high-quality design and take into

account the natural, historic and built environment and sets out criteria as to how this should be achieved.

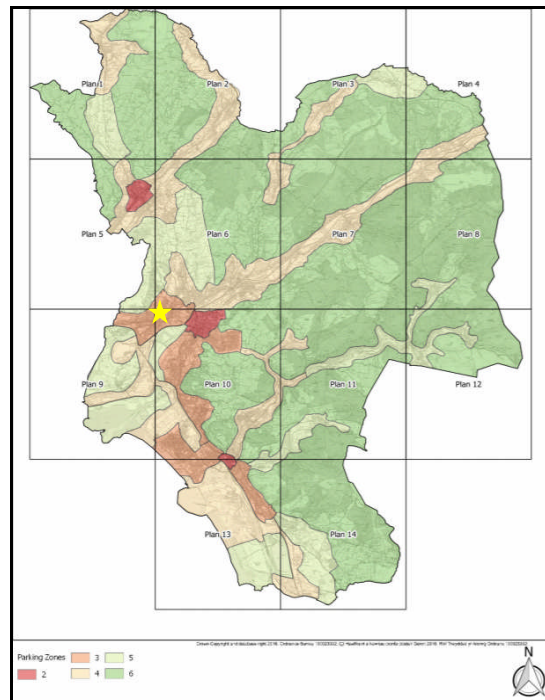
- 4.7.2 The outer building of the existing building is in a poor condition and is currently unsightly due to its 'mid-construction' status. The redevelopment will therefore refurbish the building to a high-quality and enhance its character and contribution to the setting of the adjoining area. The design of the outbuilding will not be altered therefore maintaining its influence on the townscape of the surrounding area. Although the surrounding area encompasses a variety of uses and designs the proposed design remains in-keeping with adjacent properties through utilising common features and external finishes. All of the above will ensure the proposal complies with Criteria 1,2,3 and 5 of the policy.
- 4.7.3 As mentioned previously, it is not considered that the proposed development will have a significant adverse impact on highway safety therefore also complying with Criteria 4 of the policy.
- 4.7.4 The building will be refurbished and maintained physically therefore the attractiveness and safe places of the locality will also be maintained, ensuring the proposal will comply with Criteria 6.
- 4.7.5 The proposed development is sandwiched between the District Centre of Skewen and Urban Centre of Neath Abbey, both of which have extensive community facilities and local services. The proposal will therefore encourage active travel as all essential amenities are within walking distance of the site. This ensures that the development complies with Criteria 7 by promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding environment.
- 4.7.6 The development is utilising brownfield land which is a preference identified by the Local Authority in Criteria 8 b.

4.7.7 The drainage systems are designed to limit surface water run-off and flood risk and prevent pollution, which follows the requirements of Criteria 9.

4.7.8 In summary therefore, the application proposal adheres to all relevant criterion and their requirements of Policy BE1.

4.8 PARKING STANDARDS SUPPLEMENTARY PLANNING GUIDANCE

4.8.1 The SPG sets out the parking requirements for all forms of development, which differ slightly dependant on which Zone a proposed development is location within. The proposed development lies within Zone 3 (Urban) of the Parking Zone Designation within the SPG (illustrated by Map A).



Map A – Parking Zone Map Index (Approximate Site Location Identified by Yellow Star)

4.8.2 Within the provisions of the SPG, the site is located therefore within a classified urban area, as it is in a substantially built up area with a number of basic local facilities within 400m walking distance. It also has a variety of bus routes offering up to 6 buses per hour with a range of destinations.

4.8.3 The SPG then goes on to set out the following maximum parking standards for the provision of off-street parking spaces for residential development within Zone 3:

Type of Development	Residents	Visitors
Dwellings, Apartments, House Conversions to Bedsits, or Self-Contained Apartments	1 space per bedroom (Maximum requirement 3 spaces per apartment)	1 Space per 5 units

4.8.4 Based on the above, the existing use (2 two bed flats and 1 four bed flat) would require a maximum car parking provision of **7 total spaces**. Based then on the proposed development (2 two bed flats and 1 four bed HMO), the maximum car parking provision would be **7 total spaces**. The maximum level of required off-street parking is therefore the same for both the existing and proposed uses of the application building, with the proposed use not increasing the requirement.

4.8.5 Notwithstanding the above, Annex F of the SPG allows for a reduction of the number of required spaces at sustainable locations, dependant on a site's distance from public transport and community facilities. The assessment is based on a 'points' based system, with the assigned number of points dependent upon the number and proximity of amenities. A score of seven points can lead to a reduction of one space per unit whilst ten or more points to a reduction of two spaces per unit.

4.8.6 Based on the guidance of the SPG and the associated scoring system, the following provides information on the amenities within walking distance of the application site, together with the number of points they generate for the parking provision assessment in question.

Local Facilities

- Arbournes Premier – 322m (1pts)
- Abbeygate Premier – 483m (1pts)
- One Stop Skewen – 483m (1pts)
- Post Office – 322m (2pts)
- Medical Centre – 483m (1pts)
- Abbey Primary School – 99m (3pts)

Public Transport

- White Gates Bus Stop – 35m (3pts)
- Skewen Train Station – 966m

4.8.7 Based on the above and the guidance of the SPG, the application site scores in excess of **10 points** and is clearly at a very sustainable location. This combined with no difference in the parking requirement between the existing and proposed use, ensures therefore that the principles and objectives of the SPG are adhered to by this current planning application.

5.0 ACCESSIBILITY

5.1 ACCESSIBILITY

- 5.1.1 All-inclusive design issues identified have been addressed wholly in compliance with the requirements of the Disability Rights Commission Code of Practice “Rights of Access: Services and Premises” and Part M of the Building Regulations, where applicable. Thereafter full compliance will be maintained in perpetuity.
- 5.1.2 The proposed development is positioned on St Johns Terrace with no discernible differences in ground level from the main entrance to the proposed public highway.

5.2 MOVEMENT TO, FROM AND WITHIN THE DEVELOPMENT

- 5.2.1 The application site is sandwiched between the District Centre of Skewen and Urban Centre of Neath Abbey with its associated community facilities and local services, all of which are located within walking distance of the site. Two bus stops are adjacent to the application site, all served by regular bus services.
- 5.2.2 As a result of the above, the application site will be able to fully promote the use of public transport and discourage the use of the private motor car.

6.0 CHARACTER

Landscape Design

- 6.1.1 The application proposal seeks no change to the existing external spaces of the application site.

Scale

- 6.1.2 The proposal seeks no increase in the scale of the application building.

Number

- 6.1.3 The design objective is to provide 2 residential flats and 1 HMO.

Layout of Development

- 6.1.4 The layout of the proposed development has been steered by the form of the existing building and includes very little alteration to it.

Appearance

- 6.1.5 As detailed previously, the proposal seeks very little change to the external appearance of the building, retaining its existing character and role in the setting of the local area.

7.0 COMMUNITY SAFETY

- 7.1 The layout of each element of the proposal will continue to promote a degree of natural surveillance of areas within the adjoining public realm. The proposal will not impact or impede the existing flow of pedestrian traffic on the adjoining footways.

8.0 ENVIRONMENTAL SUSTAINABILITY

Landscaping/Townscape Setting

- 8.1 As detailed above, the proposal seeks no real physical change to the existing building or its adjoining spaces.

Biodiversity and Local Environment

- 8.2 The proposal will have no detrimental impact on biodiversity or ecological interests in the area.

Energy Efficiency/Carbon Reduction

- 8.3 The following measures will be undertaken where possible to maximise energy efficiency and carbon reduction of the residential units themselves and during their construction:

- Maximise use of daylight in key rooms through fenestration
- Use of local suppliers and labour wherever possible
- Use local recycled products wherever possible
- The units will be insulated to current targets
- Energy efficient internal and external lighting units will be installed.

Sustainable Materials

- 8.4 We understand that recycled or reclaimed products will be used in the construction of the proposal wherever possible

Water

- 8.5 We understand that the existing mains supply will be utilised. In line with this, we would propose that the domestic water and heating system of the residential units be designed to reduce domestic water wastage, through a range of measures including low water consuming fittings in the bathroom and kitchen.

Waste Management

- 8.6 We understand that the residential units will have access to domestic recycling facilities.
- 8.7 The existing connection to the public sewer will be utilised for the disposal of foul waste.

9.0 CONCLUSION

- 9.1 The proposal is for the conversion of 3 approved flats to one 4-bed HMO and two 2-bed flats.
- 9.2 The application proposal seeks to bring back into beneficial use an underused and vacant building located at St Johns Terrace.
- 9.3 On the matter of sustainability, as detailed above, the application site is positioned at an extremely sustainable location within the existing urban form. Being sandwiched between the District Centre of Skewen and Urban Centre of Neath Abbey, it has easy access to a range of community facilities via foot, alongside excellent public transport links and non-car access routes. All these attributes ensure that the site and indeed the proposed development is able to fully promote sustainable transport patterns.
- 3.8 In design terms, the proposal does not propose any external physical changes and very little internal changes to that previously approved. Car parking requirements remain the same as previously approved and therefore it is considered that there will be no significant change in traffic generation or highway safety as a result of the proposal.
- 9.4 In conclusion therefore, the proposal represents an appropriate and sustainable development that adheres to all relevant current planning policy.