

Date: 29th of September 2020

Our Ref: MG/MJ/S20.238

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Dear Sir or Madam,

Town and County Planning Act 1990 (as amended)

Change of use from office (Use Class B1) to retail (Use Class A1) and associated works

53/54 New Road, Skewen, SA10 6EP

Planning Portal Reference No: PP-09103145

Asbri Planning is appointed as planning agent to Bexmoor Limited in respect of the above planning application relating to the change of use from office (Use Class B1) to retail (Use Class A1) and associated works at 53/54 New Road, Skewen, SA10 6EP.

The planning application has been submitted via Planning Portal and is accompanied by a site location plan and applications forms. No further plans will be submitted with this application on the basis that no changes are proposed to the internal configuration or elevations – the proposal is linked only to the use of the unit.

Site Description

The property is located on New Road which forms the main commercial throughfare of Skewen. The property is centred on the following grid coordinates: E: 2726974; N: 197435 and its surroundings are largely retail in character.

The property is a mid-terrace, double fronted, self-contained retail unit providing accommodation on the ground floor with WC and ancillary storage at basement levels.

The site is located approximately 250m from Skewen train station and is adjacent to Coedffranc Primary School.

Planning History

A review of Neath Port Talbot Council's planning register confirms that planning consent was obtained in June 2009 for the change of use of 53/54 New Road, from retail (Use Class A1) to offices (Use Class B1). The site's previous use as an A1 unit confirms that the building subject to this change of use has previously operated as an A1 retail unit.

The proposed Scheme

In the interest of clarity, no physical works are proposed by way of the application. The only works will be internal where planning permission will not be required in order to create retail space. The proposal therefore relates only to the use of the building.

The proposed development will result in a series of economic benefits not only for the applicant but also in the form of job creation of full-time employment.

Planning Policy Framework

Planning Policy Wales

National planning policy is contained within the tenth edition of Planning Policy Wales (PPW), published by the Welsh Government in December 2018. It constitutes guidance for Local Planning Authorities (LPAs) and decision-makers and sets out the government's planning policies for Wales and how these are expected to be applied.

The planning system is central to achieving sustainable development in Wales.

Retail and commercial centres are defined by PPW as:

"...hubs of social and economic activity and the focal point for a diverse range of services which support the needs of local communities. They are highly accessible to different modes of transport and are the most sustainable locations for new development."

The PPW states that the planning system must:

- *"promote viable urban and rural retail and commercial centres as the most sustainable locations to live, work, shop, socialise and conduct business;*
- *Sustain and enhance retail and commercial centres' vibrancy, viability and attractiveness; and*
- *Improve access to, and within, retail and commercial centres by all modes of transport, prioritising walking, cycling and public transport"*

Paragraph 4.3.5 states:

"Planning authorities should establish through their development plan a clear strategy for retail development, supported by policies, to achieve vibrant, attractive and viable retail and commercial centres. The strategy and policies should set out a framework for the future of retail and commercial centres in their area, taking in to account strategies in adjoining authorities, to promote a successful retailing sector supporting existing and new communities."

Technical Advice Notes (TAN)

TAN 4 states the Welsh Government's objectives for retail and commercial centres are to:

- Promote viable urban and rural retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business;
- Sustain and enhance retail and commercial centres vibrancy, viability and attractiveness; and
- Improving access to, and within, retail and commercial centres by all modes of transport, especially walking, cycling and public transport.

Technical Advice Note 4: Retail and Commercial Development

TAN 4 states that urban and rural retail and commercial centres are both focal points for economic activity.

Paragraphs 2.3 and 2.7 highlight that retail (use Class A1) sites contribute towards the centre's diversity and benefits the area's economic activity:

"2.3 - A wide range of uses are located in retail and commercial centres including retail, office, residential, leisure, tourism and community functions...Encouraging people to live and work in existing centres reinforces local demand and provides additional vibrancy during the day and in the evening. This diversity of uses, whilst benefiting the wider economy, will need to be carefully planned and managed to ensure that no conflicts arise, particularly with regards to amenity."

"2.7 - Good access to, and within, retail and commercial centres is key, both to the vibrancy of those places and to ensure that everyone in society has access to the wide variety of goods and services. Ensuring that this access is sustainable in nature by promoting the ability to walk, cycle or use public transport to get to retail and commercial centres is important in this regard."

Further to the above, paragraph 9.1 states:

"Vibrant and viable centres are distinguished by a diversity of uses and activities. Where primary and secondary areas have been designated in established retail and commercial centres they can help promote and maintain an effective distribution and balance of uses and activities."

Neath Port Talbot County Borough Council Local Development Plan

A review of the proposals map reveals that the site is situated within the settlement boundary for Neath, as such, is positioned in an area where development is normally permitted, subject to compliance with pertinent National and Local Planning Policies. The site is located within the District Centre (R2/1).

Given that the application relates to establishing the use of the site for retail (Use Class A1) and that the site is located within the District Centre, part 1 and 4 of Policy R2 (Proposals Within Retail Centres) is therefore relevant to the proposal as it states:

1. *Within the designated retail centres, uses that would enhance the vitality, viability and attractiveness of the centre, including uses in classes A and D will be permitted where:*
 - a) *The proposal integrates with and strengthens the layout, retail character and pedestrian flows of the centre; and*
 - b) *Does not prejudice the effective use of upper floors; and*
 - c) *Maintains a vibrant and attractive shopping street frontage.*
4. *Within the district and local retail centres, proposals that would result in the over dominance of one use of the detriment of the vitality, viability and attractiveness of the retail centre will be resisted.*

Supplementary planning guidance

In addition, the following Supplementary Planning Guidance documents adopted by Neath Port Talbot CBC are considered relevant to this pre-application enquiry:

Supplementary planning guidance: parking standards (October 2016)

The review of the council's SPG suggests that the site is located within zone 3 which is detailed as follows:

"Very much part of a substantial built up area with a number of basic local facilities within 400m walking distance. A range of bus routes offering up to 6 buses per hour; the range of destinations offering practical access to most but not all essential facilities. The curtilage of the site restricts, to an extent, what car parking can be provided. There are likely to be some restrictions on on-street parking and other available off-street parking is severely limited or non-existent."

In Zone 3 office car parking standards require 1 space per 20m for offices < 1000sqm. In Zone 3 shops require 1 commercial parking and 1 space per 60m.

Appraisal

In this section, an appraisal of the proposed development is provided. The following observations set the context for the appraisal:

- The site is situated within the settlement boundary for Neath.
- It is within the retail frontages of the District Centre of Skewen.
- The application site comprises vacant buildings. The reuse of the site will therefore avoid a long term vacancy.
- It has been used for retail (Class Use A1) in the past.
- The units have been vacant for some time. A positive use of the site is therefore proposed.
- The proposed development will contribute towards the vibrancy and attractiveness of the centre.

Principles of Development

The application proposes the change of use of the property in order for it to accord with the requirements of the incoming tenant. No physical works that require planning permission are proposed.

In regard to the principle of development, the site lies wholly within the settlement boundary of Neath where development is normally permitted subject to compliance with pertinent planning policies.

The site is situated within the District Centre of Skewen as defined by the adopted LDP. As such, Policy R2 (Proposals Within Retail Centres) is considered pertinent to the application. Policy R2 supports use classes which enhance the vitality, viability and attractiveness of the centre and specifically cites A Class uses as acceptable. The proposed change of use is without question acceptable.

The supporting text of Policy SP3 'Sustainable Communities' confirms that the role and function of district centres is to offer a wide range of functions serving the immediate and surrounding communities.

The supporting text of Policy SP12 confirms that District Centres and Local Centres *"offer a range of convenience and comparison goods as well as services which meet the needs of the local population, including health facilities and Post Offices. Their role is to enable residents to meet their day to day needs and they often form the focal point to the community, with community facilities located either within or close to the retail boundaries"*.

Given that the proposal relates to the reuse of a vacant and redundant site, it is considered the proposed development will help promote the Welsh Government's objectives of the sustainable use of land and buildings. Furthermore, the site is readily accessible to public transport nodes and local facilities by virtue of its position within close proximity to Skewen train station, the M4 and the A465.

The planning history for the site details that the site has been used as retail space (Use Class A1); this demonstrates that A1 use classes are considered to be acceptable. proposed development is therefore considered a conforming land use and wholly appropriate in this location.

Further to the above, the site is located within the retail frontages of the District Centre of Skewen. It is therefore considered that the proposed change of use of the property is wholly consistent with prevailing planning policy which seeks to encourage / retain A1 uses within such locations.

In light of the above, it is considered that principle of changing the use of existing buildings to retail (Use Class A1) and associated works at 53/54 New Road, Skewen, SA10 6EP is firmly established.

Other material planning considerations***Car parking standards***

As above, the site is located within zone 3. Its current use as an office requires 8 spaces, the site currently provides 4 parking spaces. The site's use as a shop would require 4 parking spaces. The proposed use fully addresses the council's parking requirements and is a betterment compared to its use as an office.

Conclusion

This letter has been prepared on behalf of Bexmoor Limited in respect of their application for the proposed change of office (Use Class B1) to retail (Use Class A1) and associated works at 53/54 New Road, Skewen, SA10 6EP.

The site is vacant. It lies within the settlement boundary for Neath, as such, is located in an area where development is normally permitted. Additionally, the site is located within the District Centre (R2/1) which states that uses in Class A (such as that proposed by way of this application) are in accordance with prevailing policy.

The proposal will enhance the vitality, viability and attractiveness of the centre, whilst also contributing to significant economic benefits. This comprises a material consideration in the determination of the application.

The proposal accords with national and local planning policy and its planning history reveals that the site had previously been a retail (Use Class A1) site.

I trust that you will find the application and supporting documents in order. Notwithstanding, if you require any additional information or clarification do not hesitate to contact me on the number above.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'M Gray', with a large, loopy flourish underneath.

Matthew Gray

Associate