



PLANNING, DESIGN AND ACCESS STATEMENT
PROPOSED CONVERSION OF CONVENIENCE STORE (A1) AND
ASSOCIATED 4-BED FLAT (C3) TO 9-BED HMO (C4)

on behalf of
James Stevens

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Prepared by: JDE/SB

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1.0 INTRODUCTION

1.1 Evans Banks Planning Ltd. has been instructed by Mr. J. Stevens to prepare a full planning application for the change of use of a convenience store (A1) and associated 4-bed flat to a 9-bed HMO (C4) on Victoria Road, Aberavon, Neath Port Talbot.

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 an existing ground floor convenience store and first floor residential accommodation at Victoria Road, Aberavon.



Photograph 1

- 2.1.2 The existing building is an end of terrace commercial property with associated flat located within a residential area with a residential frontage. The application building itself is two-storey in form with separation between its commercial and residential use.
- 2.1.3 The existing building consists of a shop floor, wc, storeroom, kitchen/dining room and garage on the ground floor. The second floor consists of a living room, kitchen and four bedrooms.

2.1.4 The pedestrian entrance to the building is via the southern (front) elevation, which leads from Victoria Road. The direct vehicular access route to the property is gained via Victoria Road, although there is also a garage attached to the rear of the property. On-street parking is also present.

2.1.5 The existing lawful use of the building is an A1 Shop with one residential flat.

2.2 THE SURROUNDING AREA

2.2.1 As detailed above, the application site lies within Aberavon to the west of Port Talbot, near to Port Talbot Football Club's ground.



Photograph 2

2.2.2 All terraced residential properties located on the same side as the proposed application site follow identical design patterns which consist of red-brick walling, a front door to the side frontage of the property and a protruding window on its frontage. An illustration of the housing stock is provided below:



Photograph 3

2.2.3 Notwithstanding the above, there is variance in property design and type on the opposite side of the road, as illustrated by the example shown below.



Photograph 4

2.2.4 Although Victoria Road is primarily residential in nature it does consist of a mixture of uses. A number of commercial properties are located on the road such as: food outlets, hairdressers, café, tyre shop, convenience store (Nisa Local) and a

pharmacy. An illustration of the commercial properties is provided below in Photographs 5, 6, 7, and 8.



Photograph 5



Photograph 6



Photograph 7



Photograph 8

2.2.5 A number of applications for the change of use of commercial properties on Victoria Road to become dwellinghouses have been approved previously. Examples include the following:

- Planning application no. P2020/0183, 11 Victoria Road has been approved for the proposed change of use from commercial premises to a single dwelling.
- Planning application no. P2016/0579, 5 Victoria Road has been approved for the change of use of ground floor from retail (use class A1) to a flat (use class C3).

2.2.6 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:

- 8
- 9
- 66
- 77
- 224
- 227
- 228
- 900
- 901
- 902
- X24

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 largely retain the application building in its current physical form, with no increase in its volume.
- **Design** – To largely retain the building's existing features.
- **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 a convenience store (A1) and associated flat (C3) to 9-bed HMO (C4). 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.

Internal Accommodation

- 3.3 The internal layout of the building will be largely unaltered however partition walls will be implemented to separate bedrooms where required.
- 3.4 The ground floor will consist of a bike/bins storage area, kitchen, utility room and 5 bedrooms.
- 3.5 The first floor will consist of a living area, study and 4 bedrooms.
- 3.6 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

- 3.7 The external finishes of the building will remain unaltered.

Drainage

- 3.8 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
- Policy SC2 – Protection of Existing Community Facilities

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 located within Aberavon. Table 3.1 of the LDP ‘*Settlement Hierarchy for Neath Port Talbot*’ identifies Aberavon as a ‘Large Local Centre’ as the settlement has adequate transport links with clusters of one or more retail units and local services, with one or more community facilities and employment provision. It is 3rd out of a 6-tier hierarchy, highlighting that it is considered to be a sustainable settlement by the Local Authority.

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, it may be considered that the proposed use will receive less traffic generation to its existing as a shop. 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 Section 4.8 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 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 in this case, 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 appearance of the existing building will not be altered. This is considered to be appropriate with its surroundings and remaining properties on the Victoria Road which follow a red-brick terraced residential format. This ensures it complements and

enhances the character and appearance of the building and respects the context of the site and its place within the local landscape whilst utilising materials appropriate to its surroundings therefore complying with Criteria 1,2 and 3.

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 Criterion 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 Criterion 6.

4.7.5 The proposed development is located within the 'Large Local Centre' of Aberavon. 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 Criterion 7 by promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding environment.

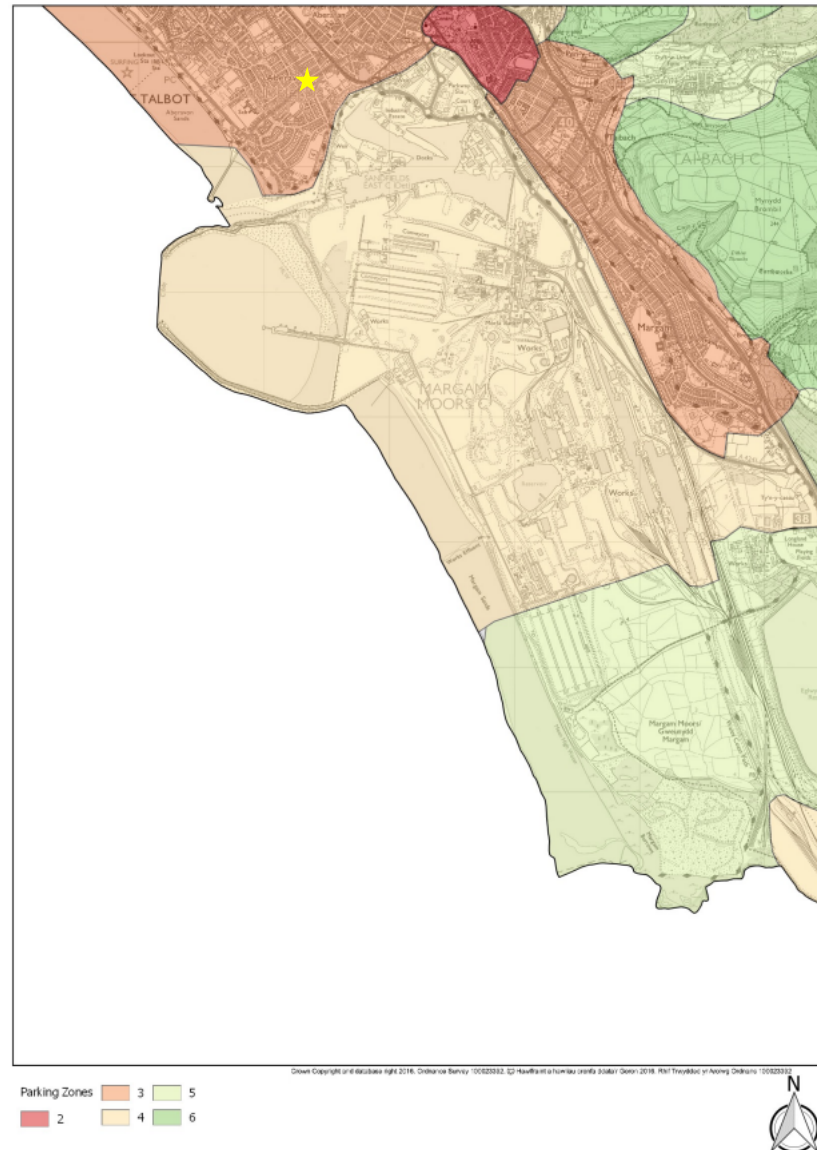
4.7.6 The development is utilising brownfield land which is a preference identified by the Local Authority in Criterion 8 b.

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 Criterion 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

Type of Development	Operational	Non-Operational
Shops (< 200m ²)	1 commercial vehicle space	1 space per 60m ²

4.8.4 As there is no specific parking requirement for HMO properties the following maximum requirements are based on a house conversion to bedsits.

4.8.5 Based on the above, the existing use (A1) and associated 4-bed flat would require a maximum car parking provision of **4 total spaces**. Based then on the proposed development (9-bed HMO), the maximum car parking provision would be **3 total spaces**. The maximum level of required off-street parking for both the existing and proposed uses of the application building is therefore not provided for.

4.8.6 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.

4.8.7 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

- Nisa Local – 136m (3pts)
- Well Port Talbot (Pharmacy) – 66m (3pts)
- Sandfields Primary School – 644m (1pts)

Public Transport

- Hospital Road Bus Stop – 15m (3pts)

4.8.8 Based on the above and the guidance of the SPG, the application site scores in excess of **10 points** and is at a sustainable location. This combined with the decrease in 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.

4.9 POLICY EC4

4.9.1 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).

4.10 POLICY SC2 – PROTECTION OF EXISTING COMMUNITY FACILITIES

4.10.1 Policy SC2 (*Protection of Existing Community Facilities*) states that any proposals which would result in the loss of an important existing community facility will only be permitted where it can be demonstrated that the facility is surplus to requirements; or the existing use is no longer viable.

4.10.2 It is considered that both are applicable to the property because of the emergence of a newer convenience store (Nisa Local) which comes with it the same facilities (Post Office and ATM), albeit within a larger floor area. The map below highlights the proximity of both businesses (application site identified by red circle, Nisa Local identified by blue circle):



Photograph 9

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 Victoria Road 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 located within the ‘Large Local Centre’ Aberavon with its associated community facilities and local services, all of which are located within walking distance of the site. A bus stop is located adjacent to the application site which is 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 one 9-bed 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 HMO 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 HMO 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 HMO 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 a ground floor convenience store (A1) and associated flat (C3) to a 9-bed HMO (C4)
- 9.2 On the matter of sustainability, as detailed above, the application site is positioned at an extremely sustainable location within the existing urban form. Being within the 'Large Local Centre' of Aberavon, 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.
- 3.9 In design terms, the proposal does not propose any external physical changes and very little internal changes to that previously approved. Car parking requirements are considered to be decreased and it is also considered that there will be a significant decrease in traffic generation as a result of the proposal.
- 9.3 In conclusion therefore, the proposal represents an appropriate and sustainable development that adheres to all relevant current planning policy.