



PLANNING, DESIGN AND ACCESS STATEMENT
PROPOSED CONVERSION OF A FORMER MEMORIAL HALL FROM
USE CLASS B8 TO ONE 1-BED (2 PERSONS) SELF-CONTAINED
FLAT.

on behalf of
James Stevens

Our Ref: 1102.d
Date: December 2020
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 former Memorial Hall to one 1-bed (2 persons) self-contained unit on Bethlehem Road, Skewen, Neath Port Talbot. The application has been prepared following the receipt of a response from the local planning authority (LPA) to a pre-application enquiry. This application has therefore given full consideration of the Authority's response to that enquiry in the preparation of the application scheme.

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 prominent building on Bethlehem Road, Skewen.



Photograph 1

2.1.2 The building is sandwiched between two rows of terraced houses on Bethlehem Road, being the only commercial property in a residential frontage (illustrated in Photograph 2 and Photograph 3).



Photograph 2



Photograph 3

- 2.1.3 The application building itself is single-story in form with windows on its frontage and a large front door located within the middle of the building. Access from the public highway can be gained via a pedestrian gate off Bethlehem Road.
- 2.1.4 Internally, the ground floor consists of a single open space, previously occupied for storage and distribution (B8) purposes.
- 2.1.5 Externally the property currently contains a small amount of amenity space along the side and front of the building.
- 2.1.6 The current lawful use of the existing building is a B8 Storage Unit. Permission for its change of use from Community Hall to Storage of costumes and props (Use Class B8) was approved in 2014 (ref: P2014/1114). The premises is to be used as storage for dance costumes and props and for no other purpose in Class B8. The reasoning behind that decision was so that other changes of use can be assessed in the interests of amenity as the site is located within a predominantly residential area where the generation of additional vehicular traffic needs to be controlled in the interest of pedestrian and highway safety.

2.2 THE SURROUNDING AREA

- 2.2.1 The application site lies near Skewen District Centre, within walking distance of its community facilities and local services.
- 2.2.2 The principle pattern of use in the immediate area of the application site is residential, where terraced houses are agglomerated along Bethlehem Road. The existing use of the development site is therefore at odds with its surroundings.
- 2.2.3 On-street parking is limited on Bethlehem Road however there are surrounding roads with less demand. Notwithstanding this, 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, a number of bus stops are located within a very short distance of 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

2.2.4 The application site also lies a short distance from Skewen train station (approx. 10-minute walk) which gives access to Swansea City Centre, Port Talbot, and Llanelli.

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 in its existing form, with no increase in its volume.
- **Design** – To respect the existing position the building occupies within the settlement through retention of key features and the use of reflective and respectful external finishes.
- **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

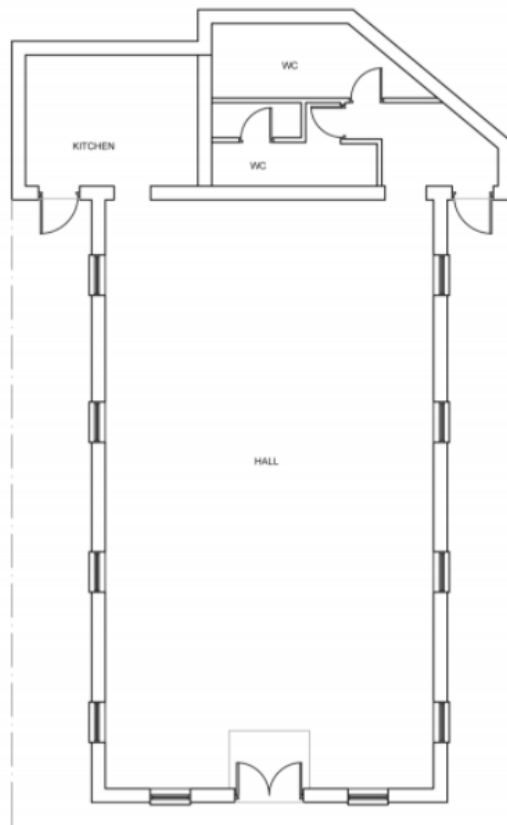
- 3.1 The proposal is for full planning permission for the change of use of a B8 Unit to one 1-bed (2 persons) self-contained residential flat. The following information should therefore be read in conjunction with the accompanying plans, drawings and associated supporting information.

Project Overview

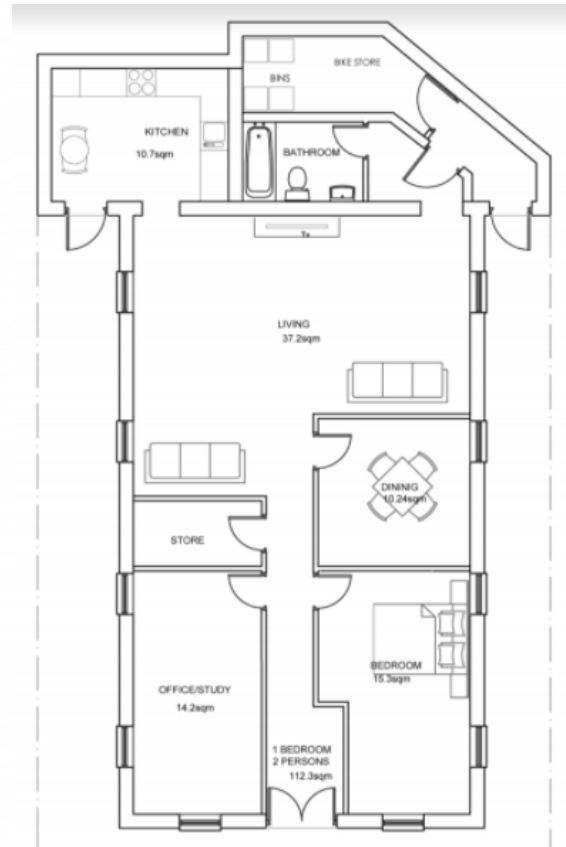
- 3.2 As detailed previously, the application proposal has drawn heavily from the guidance provided as part of the response provided by the Authority to the aforementioned pre-application enquiry. The scheme proposes the change of use from B8 to C3 of Dunstan Memorial Hall. Taking into account the former use, its future occupants and the sustainable locations of the site, the proposal does not include off-street parking.
- 3.3 The Pre-Application Ref. Q2020/0096 enquired about the proposal of change of use to 2 self-contained flats. It was noted within the pre-application enquiry that a proposal with a reduction to a single unit would be considered more favourably, which has been given due consideration within this proposal.

Internal Accommodation

- 3.4 The internal layout of the building will experience significant change. The building currently sits as a large hall with a kitchen and two W/C's to its rear. (This is shown in Plan A.).
- 3.5 The proposed layout consists of a double bedroom, an office/study, a storeroom, dining room, living area, kitchen, bathroom, refuse and bike storage. (Plan B below illustrates the proposed floor plan.)



Plan A



Plan B

External Finishes

- 3.6 All external finishes will be retained, with repairs being made on a 'like for like' basis where required.

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)
- Biodiversity and Geodiversity (May 2018)
- 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 Table 3.1 of the LDP 'Settlement Hierarchy for Neath Port Talbot' identified Skewen as a District Centre where 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 it is considered to be a sustainable settlement by the Local Authority. Therefore, the application site is located well within the Settlement Hierarchy and will promote sustainable development.

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 the application building and the introduction of a more compatible, harmonious use 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 relevant requirement of four Criteria. In the case of our application proposal, it is considered that three 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 does not impact highway safety or

create unacceptable levels of traffic generation. The existing use is considered to have needed accessibility for large storage vehicles to visit the site where-as the proposed has less of an impact. Secondly, as there is no off-street parking facilities associated with the existing site it is considered the site will not experience an increase in levels of traffic as the property is more likely to be favourable for non-car residents.

- 4.6.3 Criteria 3 requires that development is accessible by a range of travel means. The proposed development is accessible by various travel means including bus and rail as well as pedestrian routes giving access to Skewen District Centre itself.
- 4.6.4 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 necessary as it is considered that the development is unlikely to create significant traffic generation. In fact, it is considered the proposal will generate traffic of a more harmonious nature than that of the building's current use.
- 4.6.5 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 10 criteria as to how this can be achieved.
- 4.7.2 The outer building of the existing building is unique to its surroundings and will be maintained, ensuring the proposal complies with criteria 1,2,3 and 5 of the Policy. In that it complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation

treatment. It respects the context of the site and its place within the local landscape, its effects on townscape and the local historic and cultural heritage. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate and important local features are retained and enhanced.

- 4.7.3 As mentioned previously, it is not considered that the proposed development will have a significant adverse impact on highway safety therefore complying with Criteria 4 of the policy.
- 4.7.4 The building will be unchanged physically therefore the attractiveness and safe places of the locality will be maintained ensuring the proposal will comply with Criteria 6.
- 4.7.5 The proposed development is located within the District Centre of Skewen therefore encouraging 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 Lastly, Criteria 10 requires that the layout and design of the development achieves inclusive design ensuring a barrier free environment which has been implemented.
- 4.7.9 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 located. The proposed development lies within Zone 3 (Urban) of the Parking Zone Designation within the SPG.
- 4.8.2 Within the provisions of the SPG, the site is classed an urban area because it is in a very substantial built-up area with a number of basic local facilities within 400m walking distance. It also has a range of bus routes offering up to 6 buses per hour with a range of destinations.
- 4.8.3 The SPG proceeds to outline the maximum parking standards for the provision of off-street parking spaces for residential development within Zone 3:

Existing Use:

Type of Development	Residents	Visitors
Storage Warehouse	1 commercial space per 500m ²	0

Maximum Total Spaces: 1

Proposed Use:

Type of Development	Residents	Visitors
House conversions to bedsits, or self-contained apartments	1 space per bedroom (Maximum requirement 3 spaces per apartment)	1 Space per 5 units

Maximum Total Spaces: 1

- 4.8.4 Based on the above, the existing use (storage) would require a maximum car parking provision of **1 total space** as approved within planning application no. P2014/1114. Based then on the proposed development (two 1-bed flats), the maximum car parking provision would be **1 total spaces**. It is therefore considered that there is no change

in parking requirement from the existing use and the proposed use and therefore the existing parking requirement is deemed acceptable.

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 the 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 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 – 124m (3pts)
- Skewen Library – 161m (3pts)
- Queens Road Medical Centre – 130m (3pts)
- Coedffranc Primary School – 483m (1pts)
- Abbey Primary School – 483m (1pts)

Public Transport

- Colliers Arms Bus Stop – 323m (2pts)
- Skewen Train Station – 644m (1pts)

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 of Skewen. The advised reduction in on-site parking provision therefore would be 2 spaces per unit.

4.8.8 As mentioned in section 2.1.6 the existing use of the building is a storage B8 unit. It is considered therefore that there is a likelihood that the road be used by vans and

lorries loading and unloading costumes and props. It is therefore considered that the proposed application has a less conflicting use to its residential surroundings i.e. no commercial vehicles visiting the building.

- 4.8.9 To conclude the maximum total spaces required within the SPG has been identified as **1 space**. The parking requirement for the existing use is 1 space however as outlined previously there are no existing spaces. Due to the sites sustainable location and its existing proposed parking allocation it is considered that this supports our argument not to include parking.

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 Bethlehem Road with no obstructive 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 District Centre of Skewen within walking distance of community facilities and local services. The public transport network is also easily accessible for all.
- 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 1 residential flat.

Layout of Development

- 6.1.4 The layout of the proposed development has been steered by the form of the existing building. As a result, the proposal represents a logical layout that is sympathetic to both its immediate and wider setting, whilst also securing a high level of legibility for both residents of and visitors to the site.

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 Skewen.

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 maintaining the building's role within the landscape and townscape.

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 change of use of a B8 Unit to a C3 Unit of one 1-bed (2 persons) residential flat.
- 9.2 The application proposal seeks to bring back into beneficial use an underused and vacant building located at Bethlehem Road. The building includes some interesting external features, which without attention through its re-use may suffer further deterioration. The existing storage unit is located within a dense residential area and therefore the application represents a more viable and financially sustainable purpose for the building to secure its future use and form.
- 9.3 On the matter of sustainability, as detailed above, the application site is positioned at an extremely sustainable location within the urban form. Being positioned within the District Centre of Skewen, it has easy access to a range of community facilities via foot, alongside excellent public transport links and non-car access routes. Additionally, the proposed development is located within a residential area therefore the proposed use as a residential unit is more compatible to the adjoining uses. All these attributes ensure that the site and indeed the proposed use are able to fully promote sustainable transport patterns.
- 9.4 In design terms, the proposal does not propose any external alterations that would harm or erode the existing character of the application building, or its role within the wider setting. In fact, through the proposal and the subsequent reuse of the building, its position and role within the local historic context will be secured and retained for the future.
- 9.5 In conclusion therefore, the proposal represents an appropriate and sustainable development that adheres to all relevant current planning policy.