



PRE- APPLICATION CONSULTATION REPORT

CHANGE OF USE OF CYMRIC HOUSE FROM
OFFICES (CLASS B1) TO 12 FLATS.

1.0 Introduction

- 1.1 Full planning permission is sought for the complete re-development and refurbishment of Cymric House, Port Talbot from offices to 12 flats comprising 9 two bedroom and 3 one bedroom units. The proposal seeks consent to completely refurbish the building and provide high quality affordable residential accommodation
- 1.2 In accordance with Part 1A of 'The Town and Country Planning (Development Management Procedures) (Wales) (Amended) Order 2016" (DMPO 2016), all major development are required to be subject of pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority.
- 1.3 The Order requires that the following constitutes a "Pre-application Consultations.
 - a) Publicity before application for Planning Permission
 - b) Consultation before applying for Planning Permission
 - c) Duty to respond to pre-application consultation
 - d) Pre-application Consultation Report
- 1.4 This "Pre-Application Consultation Report" is prepared in accordance with Part 1 Section 2F of the 2016 Order and demonstrates how the applicant has complied with Section 61Z of the 1990 Act and responded to the Consultation received from any person consulted under Section 61Z (3) or (4) of the 1990 Act.
- 1.5 This report includes;
 - a) A copy of the Site Notice
 - b) A declaration that the notice was displayed correctly (Para 2.4 below)
 - c) A copy of the notice given to owners and occupiers of adjoining land
 - d) Copies of all notices provided to councillors, town and community councils and specialist consultees
 - e) A summary of all issues raised in response to the statutory publicity and confirmation whether and how the issues raised have been addressed
 - f) A summary of all issues raised in response to the consultation with other consultees and confirmation whether and how the issues raised have been addressed
 - g) Copies of all responses received from specialist consultees and an explanation of how each response has been addressed.

2.0 Publicity before Applying for Planning Permission

2.1 In accordance with Section 2C of the Development Management Procedure Order 2016, the applicant has undertaken the appropriate publicity by way of:-

- Displaying a site notice for a period of 28 days from 31/10/2020 to 30/11/2020. A copy of the site notice and map of location is included in *Appendix 2 and 3*.
- Given requisite notice in writing to owners / occupiers of any land adjoining the application site (list contained in Appendix 1)

2.2 Made the following information available for inspection;

- Application Forms;
- Design & Access Statement;
- Drawings;
- Planning Statement;

2.3 The documents were made available for inspections at:

- <https://www.dropbox.com/sh/4cz28m95af6s08z/AADoeJQ6eyknH98NahIKQPOha?dl=0>

2.4 In accordance with the requirements of Part 1A of The Town and Country Planning (Development Management Procedures) (Wales) (Amended) Order 2016 (DMPO 2016), I hereby declare that the notice was displayed correctly.

3.0 Consultation before Applying for Planning Permission

3.1 In accordance with Section 2D of the DMP Order 2016 the applicant has undertaken the following consultations;

- Undertaken consultation with Local Ward Members. (copies of notice included in Appendix 4).

3.2 Undertaken consultation with the following specialist consultees (copy of notices included in Appendix 5):

- Coal Authority;
- Dwr Cymru/Welsh Water;
- NRW;
- NPT Highways;

3.3 The above consultees were given notice that the responses were required within 28 days from the receipt of the notice (01/06/2020).

4.0 Response to Pre-Application Consultation:

4.1 Specialist Consultees

In accordance with the requests of Section 2E of its DMPO 2016, the following specialist consultee have responded to the pre-application consultation; (copies included in Appendix 7)

- Coal Authority;
- Dwr Cymru;
- NRW;
- NPT Highways

4.2 The specialist consultees have submitted the following representations:

Natural Resource Wales: NRW Response

Based on the information provided, we have significant concerns with the proposed development. To overcome these concerns, we would recommend to the planning authority that the following requirement should be met before permission is granted. Otherwise, we would object to the planning application. Requirement: Provision of a Flood Consequence Assessment (FCA) is required to demonstrate the risks and consequences of flooding can be managed to an acceptable level.

Flood Risk

The proposed change of use from an existing office to residential accommodation, in the form of 11 flats, would mean a change from less vulnerable to highly vulnerable development. Our Flood Risk Map, which is updated on a quarterly basis, confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in TAN15 and within the 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Afan. Development within Zone C1 will first need to be justified by the Local Planning Authority (LPA) in line with Section 6 of TAN 15. Therefore, we refer them to the tests set out in section 6.2 of TAN15.

If they consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for you as the applicant to demonstrate, through the submission of a Flood Consequences Assessment (FCA), that the potential consequences of flooding can be managed to an acceptable level. We are unable to give you technical advice on the acceptability of flooding consequences, as no FCA has been submitted. Therefore, if the development can be justified, the above requirement should be met, prior to the determination of the application.

We can then advise the LPA whether the FCA is in accordance with the technical criteria in Appendix 1 of TAN15. The FCA should be proportionate to the development proposed. To help prepare an FCA, we have developed guidance, which contains technical advice and recommendations.

To conclude, given this is a sizeable residential proposal with the inclusion of ground floor sleeping in DAM Zone C1 and the 0.1% (1 in 1000 year) flood outline (Flood Zone 2), we would require an FCA to be undertaken and submitted as part of any future planning application, to ascertain if Tables A1.14 & A1.15 of TAN15 can be satisfied. The impact of climate change in the 1% (1 in 100 year) flood outline would also need to be assessed.

Ecology and Protected Species

We note from the Design & Access Statement that the proposal will seek to refurbish the existing building, including minor external alterations to facilitate the provision of secure cycle and refuse storage space. It is also stated that whilst the scheme will result in no physical alterations, the proposal will result in some additional alterations to the pattern of fenestration. As there do not appear to be any proposals to carry out works to the roof, fascias or barge boards, the risk of impacts to potential roosting features (PRF's) for bats, would appear to be limited. However, as no Ecological Assessment has been submitted as part of the consultation, we are unable to provide any detailed comments in relation to such matters. Therefore, we recommend that you seek the advice of the Local Authority's Planning Ecologist to determine if there is a reasonable likelihood of bats, a European protected species, being present within the application site. If so, in accordance with Technical Advice Note 5: Nature Conservation and planning (paragraph 6.2.2), a bat survey may be required. Any survey should be carried out in accordance with; 'Bat Surveys; Good Practice Guidelines 3rd Edition' published by the Bat Conservation Trust 2016. If any survey undertaken finds that bats are present at the site, then we would be happy to provide additional comments, if further advice from us was required.

Dwr Cymru/Welsh Water: Response

We refer to the letter received and your formal request for a pre-application consultation response from Dwr Cymru Welsh Water, as a 'Specialist Consultee' as defined by Paragraph (y) of Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, before applying for planning permission. It is acknowledged that the consultation request relates to a major development site and thus seeks a substantive response within 28 days from the date of the notice as per the requirements of Article 2E. This request includes our views on the capacity of our network of assets and infrastructure to accommodate your proposed development and by response we offer no objection subject to the following standing advice which should be taken into account within any future planning application for the proposal:

SEWERAGE

We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system. However, the approved use should investigate an adequate grease trap to be fitted, in accordance with environmental health regulations, and maintained thereafter so as to prevent grease entering the public sewerage system.

As of 7th January 2019, this proposed development may be subject to Schedule 3 of the Flood and Water Management Act 2010. In the event this proposed development amounts to a total impermeable area of 100sqm or more, approval of Sustainable Drainage Systems (SuDS) features will be required in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. It would therefore be recommended that the developer engage in consultation with the City & County of Swansea Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, Dwr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation

In addition, please note, any planning permission granted does not extend rights to carry out any works to the public sewerage or water supply systems without first having obtained the necessary permissions required by the Water industries Act 1991. This means that any alterations to existing premises that result in the creation of additional premises or merging of existing premises must be constructed to that each of the premises is separately connected to the Company's water main and can be separately metered. Please contact our new connections team on 0800 917 2652 for further information.

You are also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

SEWAGE TREATMENT

No problems are envisaged with the Wastewater Treatment Works for the treatment of domestic discharges from this site

WATER SUPPLY

A water supply can be made available to service this proposed development. The cost of providing new on-site watermains can be calculated upon the receipt of detailed site layout plans which should be sent to the above address

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com

SWANSEA HIGHWAY DEPARTMENT—No response received.

Response to Pre-Application Consultation – Adjoining Owner/Occupier/Public/Local Members

NO RESPONSE RECEIVED

- 4.3 The consultation process has raised one issue with respect the requirement for an FCA in support of this application. This has been submitted in support of the application.

5.0 Conclusion

- 5.1 This Pre-Application Consultation Report is prepared in accordance with Part 1 Section 2F of the 2016 Order and demonstrates how the applicant has complied with Section 61Z of the 1990 Act and responded to the comments received from any interest party consulted under Section 61Z (3) or (4) of the 1990 Act.
- 5.2 As required by \Sections 2C, 2D and 2E of the Development Management Procedure Order (2016), the forthcoming application has been publicised in accordance with the regulations. Consultations have been undertaken and responses are provided in this report.
- 5.3 Where appropriate, responses to comments received are provided in addition to details of any amendments to the application package/ proposal arising from the comments received.
- 5.4 In accordance with the above, it is considered that the requirements of Part 1 Section 2C, 2D, 2E and 2F of the 2016 Order have been satisfied.

APPENDIX 1

Schedule of all consultees notified of proposed
Development.

SPECIALIST CONSULTEES

The Coal Authority

Natural Resource Wales

Dwr Cymru/Welsh Water

NPT Highways

LOCAL MEMBER

Councillor Freeguard

Councillor Keogh

Councillor Rahaman

CONTACT

planningconsultation@coal.gov.uk

swplanning@cyfoethnaturiolcymru.gov.uk

NDCplanning@dwrcymru.com

Networkmanagement@swansea.gov.uk

CONTACT

cllr.s.e.freeguard@npt.gov.uk

cllr.d.keogh@npt.gov.uk

cllr.s.rahaman@npt.gov.uk

APPENDIX 2

Copy of Site Notice

**SCHEDULE 1B
PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING
PERMISSION**

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

(to be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Purpose of this notice : this notice comprises a formal request for a pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development at Cymric House, Bethany Square, Port Talbot.

I give notice that Aston Lane LTD is intending to apply for planning permission to change the use of the existing building from offices (Class B1) to 11 flats (Class C3).

A copy of the proposed application can be found at <https://www.dropbox.com/sh/4cz28m95af6s08z/AADoeJQ6eyknH98NahIKQPOha?dl=0>

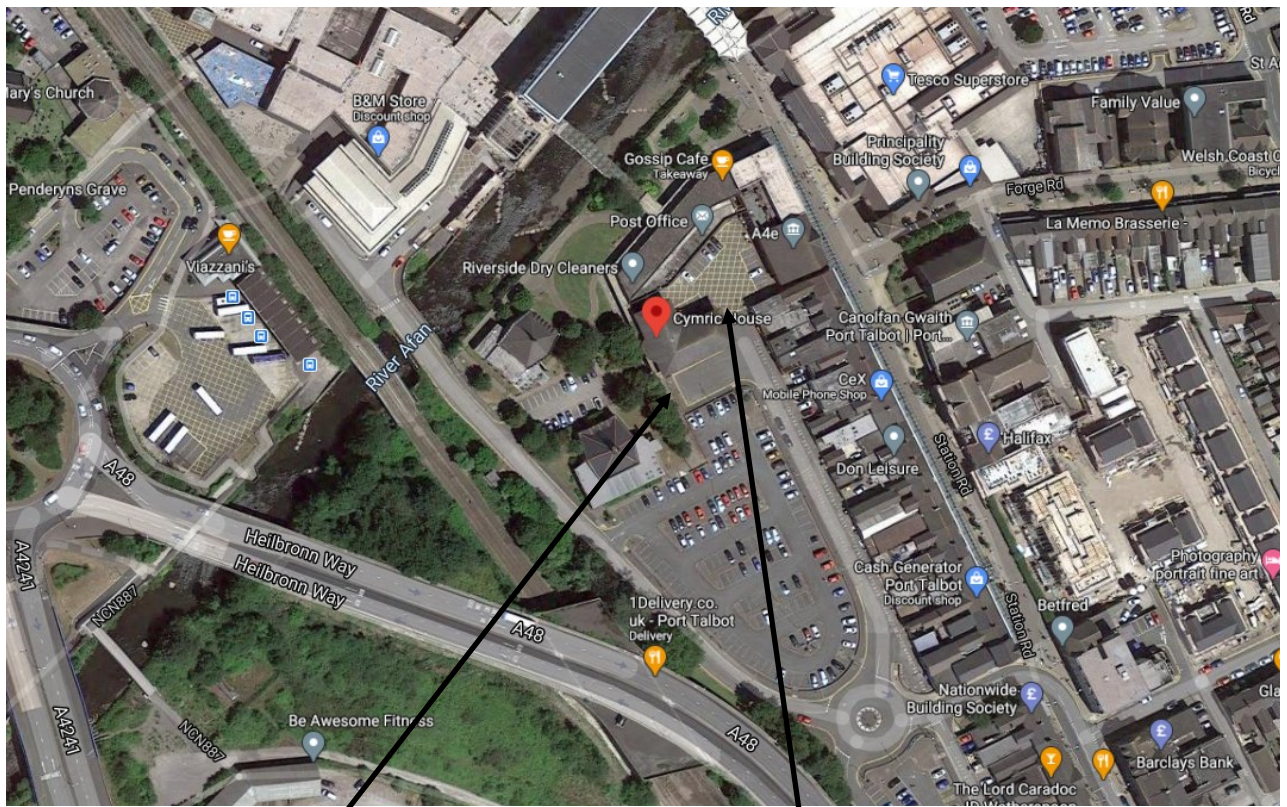
In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to astonlaneltd@gmail.com by 29/06/20.

Signed: V Johnson

Date: 01/06/20

APPENDIX 3

MAP IDENTIFYING LOCATION OF SITE NOTICES.



Location 1

Location 2

APPENDIX 4

**Copies of all notices provided to Councillors,
Town and Community Councils**

Change of use of Cymric House from offices to residential - Developer Pre-application

Aston Lane <astonlane1td@gmail.com>
to bcc: cllr.s.rahaman, bcc: cllr.d.keogh, bcc: cllr.s.e.freeguard
Good evening,

Thu, May 28, 9:34 PM

In accordance with the Town and Country Planning (Development Management Procedure)(Wales) Order 2012 please find attached my pre-application submission for the change of use of Cymric House from Offices (Class B1) to 11 flats (Class C3).
Should you require anything else, please do not hesitate to contact me.

Regards
Victor

7 Attachments


Site Notice Publica...


Planning Statemen...


Design and Access...


Appendix A - Mark...


Proposed Block an...


Proposed Plans an...


Existing Plans and ...

APPENDIX 5

Copies of all notices provided to Specialist
Consultees

Change of use of Cymric House from offices to residential - Developer Pre-applicati Inbox X

Aston Lane <astonlane1d@gmail.com>
to bcc: developer.services, bcc: swplanning, bcc: hdc
Good evening,

Thu, May 28, 9:26 PM

In accordance with the Town and Country Planning (Development Management Procedure)(Wales) Order 2012 please find attached my pre-application submission for the change of use of Cymric House from Offices (Class B1) to 11 flats (Class C3).
Should you require anything else, please do not hesitate to contact me.

Regards
Victor

7 Attachments

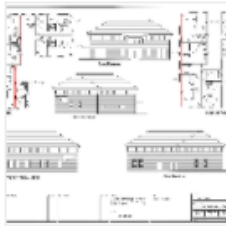


APPENDIX 6

Screen-shot of Website Consultation Portal

Cymric House

Sorted by name



002 - Proposed Elevatio...
(1).pdf



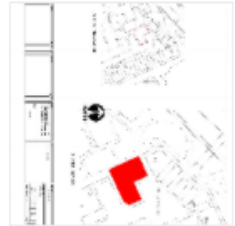
Appendix A - Marketing...
(1).pdf



Design and Access Stat...
use.pdf



Planning Statement - C...
use.pdf



Proposed Block and Lo...
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Proposed Plans and ele...
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APPENDIX 7

Copies of all responses received from
Specialist
Consultees

Mr. Victor Johnson
Aston Lane Limited
Bynea House
Heol Y Bwlch
Llanelli
Carmarthenshire
SA14 9SU

Dyddiad / Date: 18 June 2020

Annwyl / Dear Mr. Johnson,

**STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.**

**BWRIAD / PROPOSAL: CHANGE THE USE OF THE EXISTING BUILDING FROM
OFFICES (CLASS B1) TO 11 FLATS (CLASS C3).**

**LLEOLIAD / LOCATION: CYMRIC HOUSE, BETHANY SQUARE, PORT TALBOT,
SA13 1PQ**

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received the full details of your proposal on 1 June 2020.

Based on the information provided, we have significant concerns with the proposed development. To overcome these concerns, we would recommend to the planning authority that the following requirement should be met before permission is granted. Otherwise, we would object to the planning application.

Requirement: Provision of a Flood Consequence Assessment (FCA) is required to demonstrate the risks and consequences of flooding can be managed to an acceptable level.

Flood Risk

The proposed change of use from an existing office to residential accommodation, in the form of 11 flats, would mean a change from less vulnerable to highly vulnerable development.

Our Flood Risk Map, which is updated on a quarterly basis, confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in TAN15 and within the 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Afan.

Development within Zone C1 will first need to be justified by the Local Planning Authority (LPA) in line with Section 6 of TAN 15. Therefore, we refer them to the tests set out in section 6.2 of TAN15.

If they consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for you as the applicant to demonstrate, through the submission of a Flood Consequences Assessment (FCA), that the potential consequences of flooding can be managed to an acceptable level.

We are unable to give you technical advice on the acceptability of flooding consequences, as no FCA has been submitted. Therefore, if the development can be justified, the above requirement should be met, prior to the determination of the application. We can then advise the LPA whether the FCA is in accordance with the technical criteria in Appendix 1 of TAN15.

The FCA should be proportionate to the development proposed. To help prepare an FCA, we have developed [guidance](#), which contains technical advice and recommendations.

To conclude, given this is a sizeable residential proposal with the inclusion of ground floor sleeping in DAM Zone C1 and the 0.1% (1 in 1000 year) flood outline (Flood Zone 2), we would require an FCA to be undertaken and submitted as part of any future planning application, to ascertain if Tables A1.14 & A1.15 of TAN15 can be satisfied. The impact of climate change in the 1% (1 in 100 year) flood outline would also need to be assessed.

Ecology and Protected Species

We note from the Design & Access Statement that the proposal will seek to refurbish the existing building, including minor external alterations to facilitate the provision of secure cycle and refuse storage space. It is also stated that whilst the scheme will result in no physical alterations, the proposal will result in some additional alterations to the pattern of fenestration.

As there do not appear to be any proposals to carry out works to the roof, fascias or barge boards, the risk of impacts to potential roosting features (PRF's) for bats, would appear to be limited. However, as no Ecological Assessment has been submitted as part of the consultation, we are unable to provide any detailed comments in relation to such matters.

Therefore, we recommend that you seek the advice of the Local Authority's Planning Ecologist to determine if there is a reasonable likelihood of bats, a European protected species, being present within the application site. If so, in accordance with Technical Advice Note 5: Nature Conservation and planning (paragraph 6.2.2), a bat survey may be required.

Any survey should be carried out in accordance with: '*Bat Surveys; Good Practice Guidelines 3rd Edition*' published by the Bat Conservation Trust 2016.

If any survey undertaken finds that bats are present at the site, then we would be happy to provide additional comments, if further advice from us was required.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#).

We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.



Dŵr Cymru
Welsh Water

Developer Services
PO Box 5198
Cardiff
CF10 0SA
Tel: +44 (0)300 917 2652
Fax: +44 (0)300 916 612
Email: developer.services@dwrcymru.com

0800 917 2652
0800 916 612
0800 917 2652
0800 916 612

Lambert Smith Hampton
Axis 17
Mallard Way
Swansea Vale, Swansea
Swansea
SA7 0AJ

Date: 19/06/2020
Our Ref: PPA0004907

Dear Sir/Madam

Grid Ref: 276525 190044
Site Address: Cymric House, Bethany Square, Port Talbot
Development: Schedule 1C Article 2D - Change of use of existing building from Offices to 11 Flats

We refer to the letter received and your formal request for a pre-application consultation response from Dŵr Cymru Welsh Water, as a 'Specialist Consultant' as defined by Paragraph (j) of Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, before applying for planning permission. It is acknowledged that the consultation request relates to a major development site and thus seeks a substantive response within 28 days from the date of the notice, 1st June 2020, as per the requirements of Article 2E.

This request includes our views on the capacity of our network of assets and infrastructure to accommodate your proposed development and by response we offer no objection subject to the following standing advice which should be taken into account within any future planning application for the proposal:

SEWERAGE

We have considered the impact of foul flows generated by the proposed development and concluded that flows can be accommodated within the public sewerage system.

As of 7th January 2019, this proposed development may be subject to Schedule 3 of the Flood and Water Management Act 2010. In the event this proposed development amounts to an increase in impermeable area of 100sqm or more, or comprises a material amendment to the drainage characteristics of the site, approval of Sustainable Drainage Systems (SuDS) features will be required in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. It would therefore be recommended that the developer engage in consultation with Neath Port Talbot County Borough Council, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, Dŵr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.



glas
GLAS
GLAS

The proposed development is a new development.

GLAS is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.

You may need to apply to Dŵr Cymru Welsh Water for any connection to the public sewer under Section 106 of the Water Industry Act 1991. However, if the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"-7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.

You are also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist you may contact Dŵr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dŵr Cymru Welsh Water has rights of access to its apparatus at all times.

SEWAGE TREATMENT

No problems are envisaged with the Wastewater Treatment Works for the treatment of domestic discharges from this site.

WATER SUPPLY

A water supply can be made available to service this proposed development. The cost of providing new on-site water mains can be calculated upon the receipt of detailed site layout plans which should be sent to the above address.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrcymru.com



glas
GLAS
GLAS

The proposed development is a new development.

GLAS is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.

Please quote our reference number in all communications and correspondence.

Yours faithfully,


Owain George
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually, consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.



glas
GLAS
GLAS

The proposed development is a new development.

GLAS is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.