



# PLANNING STATEMENT

SITE: CYMRIC HOUSE, PORT TALBOT.

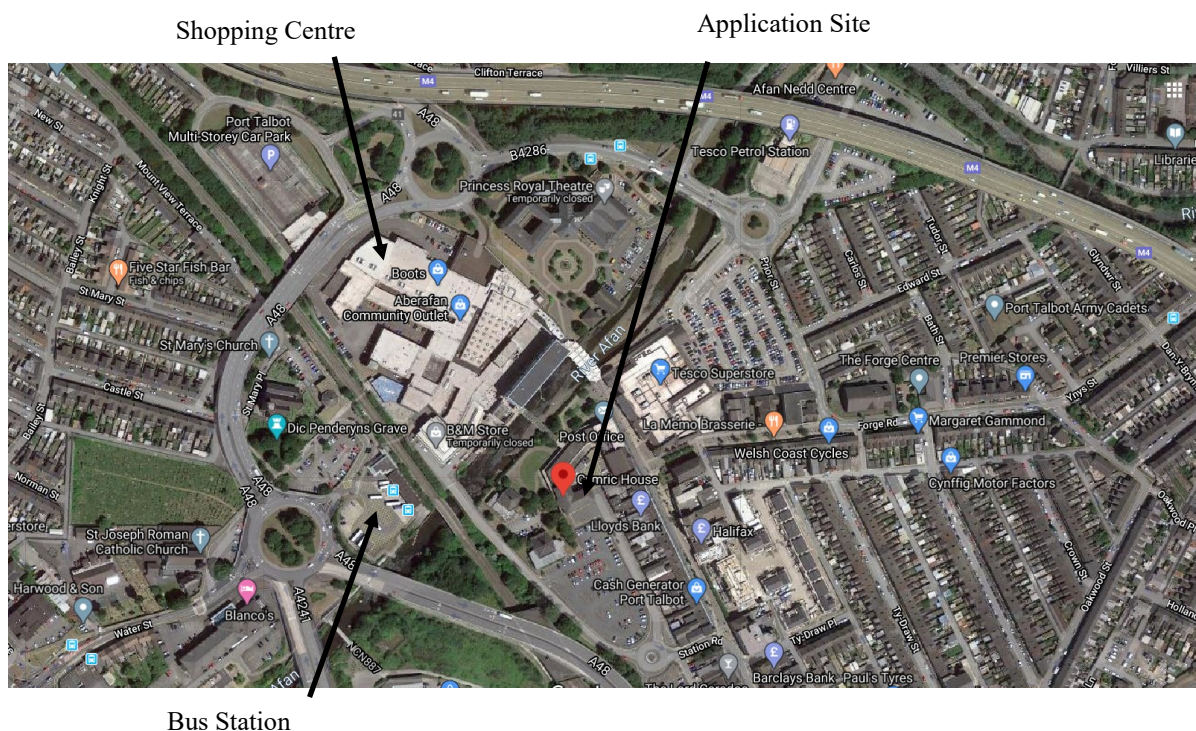
PROPOSAL: CHANGE OF USE OF CYMRIC  
HOUSE FROM OFFICES (CLASS B1) TO 11  
FLATS (CLASS C3).

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## 1.0 Background

- 1.1 Full planning permission is sought for the complete re-development and refurbishment of Cymric House, Port Talbot from offices to 11 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 The proposal will involve minor external alterations facilitate the provision of secure cycle and refuse storage space. The existing building is a large 2 storey brick building which was formally offices however, the majority of the space is currently vacant due to a lack of demand for office space. The application site is situated within the Port Talbot Town Centre in a backland location away from the primary frontage.
- 1.3 The proposal seeks to utilise existing opening where possible. The re-development will bring a vacant building back into beneficial use and attract additional footfall to this backland located site.



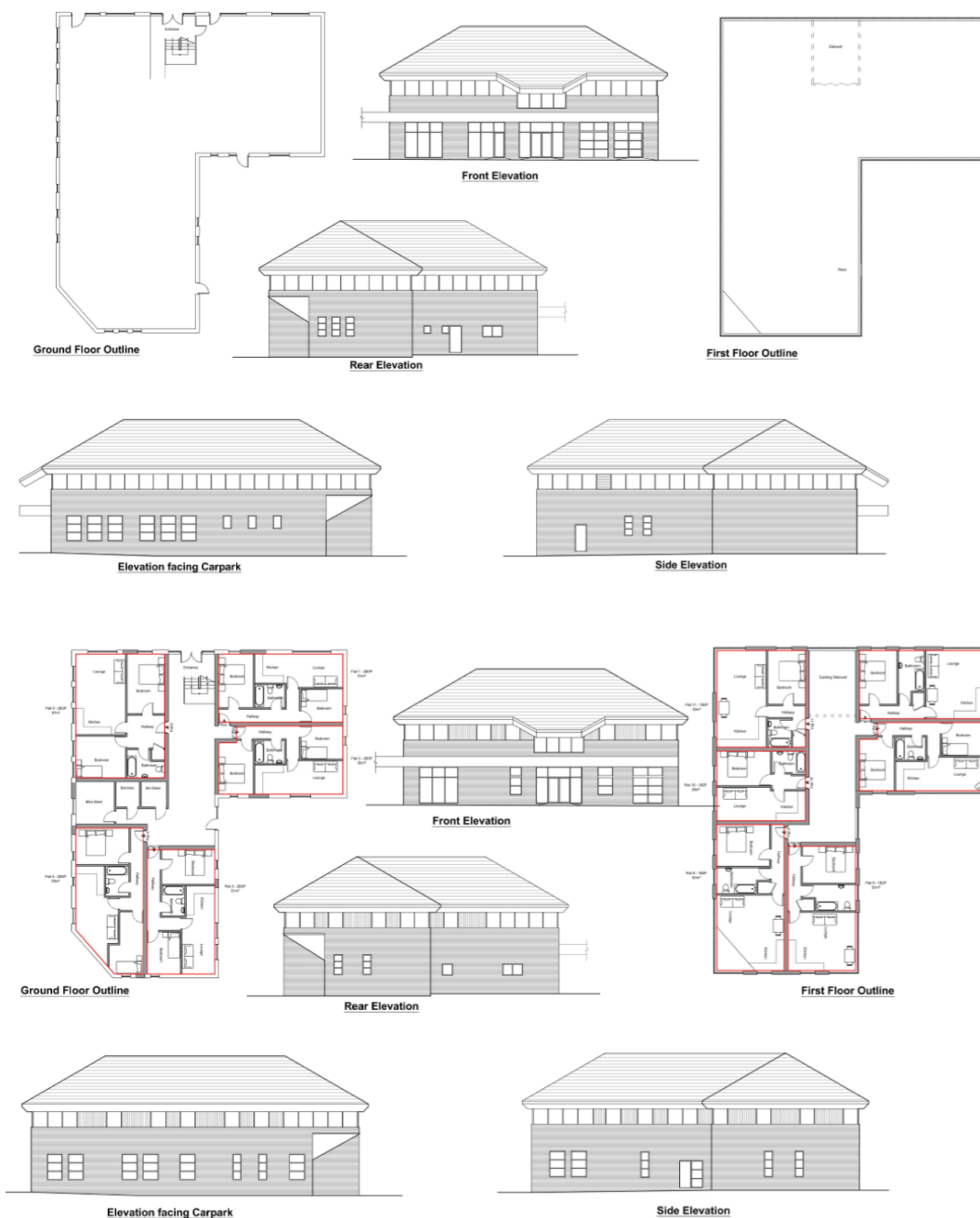
- 1.4 This part of Port Talbot Centre is in dire need of investment and whilst it was once a vibrant commercial centre it has become run down over the past few years. This development will involve the introduction of good quality affordable apartments in a highly sustainable location.
- 1.5 As previously discussed, the application site is situated in a backland location behind the primary shopping centre. The building is in need of refurbishment and is in a prime spot within the Town Centre within very close proximity to the primary shopping centre, employment opportunities, numerous public amenities and the main Port Talbot train and bus stations. The refurbishment of this building will result in it being brought into beneficial use which will enhance this location from a social,

economic and environmental perspective.

- 1.6 The proposal would introduce 5 x two bedroom flats and refuse and cycle storage at ground floor level and 1 x two bedroom flat and 5 x one bedroom flats at 1st floor level. A Housing Association is very interested in developing out the proposal and all flats will be constructed to DQR standards.
- 1.7 The existing offices have been marketed since September 2019 by Lambert Smith Hampton with no interested received in that 8 month period (See Appendix A).

## 2.0 Proposal

- 2.1 The existing building is split over 2 floors and has large open plan office areas.



### 3.0 Policy Context

#### National Guidance

#### Planning Policy Wales 2018

3.1 The following policy/guidance documents prepared at the national (Welsh Government) level are of relevance to the determination of the application.

#### Placemaking

3.2 Paragraph 2.8 sets out the key drivers for placemaking, and states:

***“Planning policies, proposals and decisions must seek to support the well - being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven national well - being goals, by using the five Ways of Working, as required by the Well - being of Future Generations Act. This will include seeking to maximise the cultural, social, environmental and economic benefits, while considering potential impacts when assessing proposals and policies in line with the Act’s Sustainable Development Principle.”***

3.3 Paragraph 1.14 sets out The Well-being of Future Generation’s Goals.



3.4 Paragraph 2.3 states:

***“ The planning system should create Sustainable Places which are attractive, sociable, positive, secure, welcoming, healthy and friendly. Development proposals should bring people together and make us want to live, work and play in areas with an unmistakable sense of place and well - being creating prosperity for all.”***

3.5 Paragraph 2.6 states:

***“Sustainable placemaking is an inclusive process, involving all of those with a professional or personal interest in the built and natural environment, which focuses on developing plans, making decisions and delivering developments which contribute to the creation and enhancement of sustainable places.”***

People and Places – National Sustainable Placemaking Outcomes

3.6 Paragraph 2.17 states:

***“In responding to the key principles for the planning system, the creation of Sustainable Places and in recognition of the need to contribute to the wellbeing of future generations in Wales, planning policies and development proposals must seek to deliver development that address the National Sustainable Placemaking Outcomes.”***

National sustainable placemaking outcomes

5.7 Figure 5 on page 21 outlines how PPW should be used to achieve sustainable places in a diagrammatic manner.



5.8 Paragraph 2.2 sets out how to assess the sustainable benefits of development:

Planning authorities should ensure that economic, social, cultural and environmental benefits are given equal consideration in the decision - making process, by following the five Ways of Working, to ensure a balanced assessment is carried out and to implement the Wellbeing of Future Generations Act and the Sustainable Development Principle. There may be occasions when one type of benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contribution against the wellbeing goals. In assessing these benefits, key factors include:

- the numbers and types of long term jobs expected to be created or retained;
- whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing local employment opportunities or upgrading the environment;
- A consideration of the contribution to wider strategies , for example for the growth or regeneration of certain areas;
- the contribution this economic activity will have to wider policy goals, for example in the green growth sector; and
- how does the proposal support achievement of a more prosperous, low carbon, innovative and resource efficient Wales.

#### Social Considerations

- \_who are the interested and affected people and communities;
- how does the proposal change a persons way of life, which can include:
- how people live, for example, how they get around and access services;
- how people work, for example, access to adequate employment;
- how people socialise, for example, access to recreation activities; and
- how people interact with one another on a daily basis.
- who will benefit and suffer any impacts of the proposal;
- what are the short and long - term consequences of the proposal on a community, including its composition, cohesion, character, how it functions and its sense of place; and
- how does the proposal support development of more cohesive communities.

#### Cultural Considerations

- how far the proposal supports the conditions that allow for the development and growth of the Welsh Language;
- whether or not the development protects areas and assets of cultural and historic significance;
- have the cultural links and their relationships with the tourism industry been appropriately maximised;
- if the proposal protects areas known for their cultural value in terms of music, literature, sport and the arts; and
- vibrant cultural experiences.

## Environmental Considerations

- will important features of the natural, historic and built environment be protected and enhanced;
- are the environmental impacts of development on health and amenity limited to acceptable levels and the resilience of ecosystems improved;
- is environmental protection for people, natural and cultural resources , property and infrastructure maximised and environmental risks prevented or appropriately managed;
- will high standards of restoration, remediation, decommissioning and beneficial after uses be achieved;
- will the depletion of non-renewable resources be minimised, waste prevented and the efficient and most appropriate use of materials made and reuse and recycling promoted;
- will the causes and impacts of climate change be fully taken into account through location, design, build, operation, decommissioning and restoration; and
- does it support decarbonisation and our transition to a low carbon economy”

## Good Design

Paragraph 2.27 states:

***“Good design is fundamental to creating sustainable places where people want to live, work and socialise and enjoy. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment. To achieve sustainable development, design must go beyond aesthetics and include the social, environmental, cultural and economic aspects of the development, including its construction, operation and management, and the relationship with its surroundings.”***

3.9 Paragraph 3.4 sets out the above in an illustrative / diagrammatic manner.

Figure 7: Objectives of Good Design



Promoting Healthier Places

3.10 Paragraph 3.21 states:

***“Planning authorities have a role to play in the prevention of physical and mental illnesses caused, or exacerbated, by pollution, disconnection of people from social activities (which contributes to loneliness) as well as the promotion of travel patterns which facilitate active lifestyles. The planning system must consider the impacts of new development on existing communities and maximise health protection and wellbeing and safeguard amenity. This will include considering the provision of, and access to, community and health assets, such as community halls, libraries, doctor’s surgeries and hospitals. Health impacts should be minimised in all instances, and particularly where new development could have an adverse impact on health, amenity and wellbeing. In such circumstances, where health or amenity impacts cannot be overcome satisfactorily, development should be refused. ”***

3.11 Paragraph 3.22 states:

***“Planning authorities should develop and maintain places that support healthy, active lifestyles across all age and socio-economic groups, recognising that investment in walking and cycling infrastructure can be an effective preventative measure which reduces financial pressures on public services in the longer term. The way a development is laid out and arranged can influence people’s behaviours and decisions and can provide effective mitigation against air and noise pollution. Effective planning can provide calming, tranquil surroundings as well as stimulating and sensory environments, both of these make an important contribution to successful places .”***

#### Housing

3.12 Paragraph 4.22 states:

***“In respect of housing the planning system must:***

***Identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;***

***Enable provision of a range of well designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and***

***Focus on the delivery of the identified housing requirement and supply.”***

#### Affordable Housing

3.13 Paragraph 4.2.25 states:

***“A community’s need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications. Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers.”***

## Active and Social Streets

3.14 Paragraph 4.1.21 states:

***“The Welsh Government policy endorses Manual for Streets, and its companion guide Manual for Streets 2, and expects the design of new or enhanced streets to reflect its principles. Planning authorities must ensure the design of streets create high - quality places and should challenge development proposals with standardised, prescriptive, engineering - focussed, risk adverse street designs. Where required, design and access statements should demonstrate how the design of new or enhanced streets has taken into account the guidance in Manual for Streets.”***

## Public Transport

3.15 Paragraph 4.1.36 states:

***“ Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are highly accessible by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure, and services reallocating their use if necessary. In rural areas, planning authorities should designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development.”***

Technical Advice Notes (TANs)

3.16 The relevant Technical Advice Notes of relevance to the determination of this application are;

## TAN 12 - Design

3.17 Detailed guidance on the objectives of good design is set out within TAN 12. The objectives of good design are set out within the following categories:

### **Access**

- Ensuring ease of access for all

### **Movement**

- Promoting sustainable means of travel

### **Sustaining or Enhancing Local Character**

- Promoting legible development
- Promoting a successful relationship between public and private space ▪ Promoting quality, choice and variety
- Promoting innovative design

## Community Safety

- Ensuring attractive, safe public spaces
- Security through natural surveillance

## Environmental Sustainability

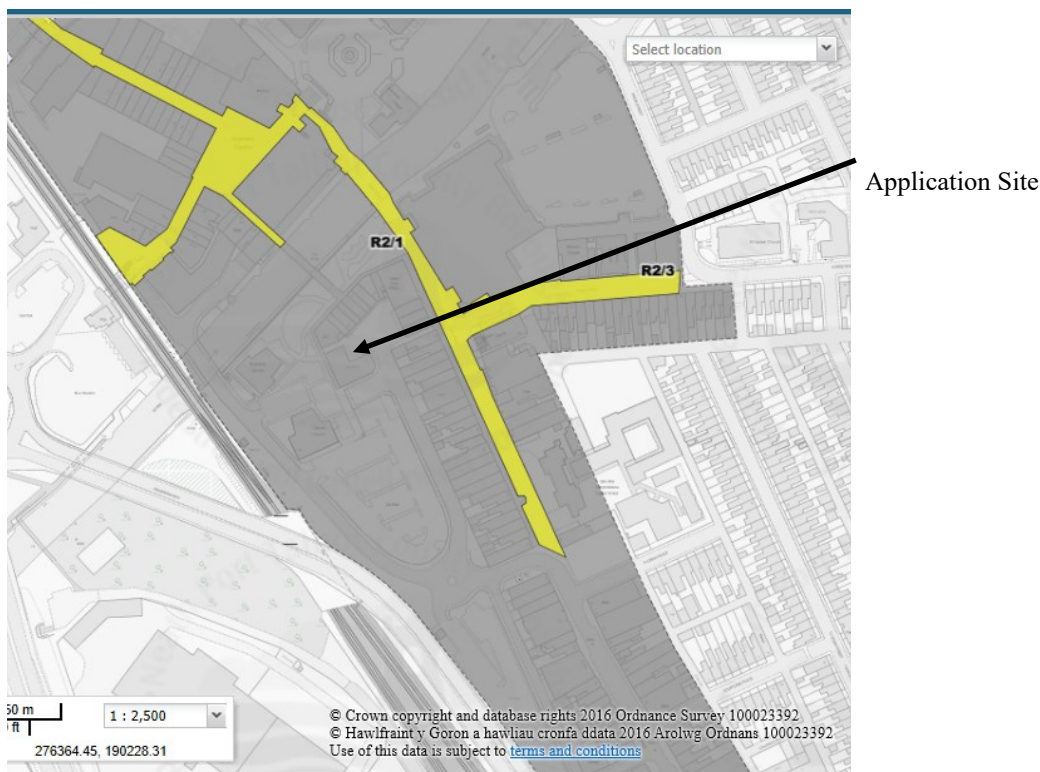
- Achieving efficient use and protection of natural resources
- Enhancing biodiversity
- Designing for change

3.18 TAN 12 advises that in areas of special character such as conservation areas the way in which new development is accommodated and change is managed may need a greater level of direction from the local planning authority. It is stated that “whilst meeting the objectives of good design should be the starting point, more detailed advice may be required to ensure preservation or enhancement of specific qualities and these should form part of the pre-application discussions.

## TAN 15—Development & Flood Risk

### Neath Port Talbot Local Development Plan

3.20 The Neath Port Talbot Local Development Plan is the most relevant document when considering planning applications within the County.



### **Policy SC1—Settlement Limits**

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. Outside settlement limits, development will only be permitted under the following circumstances:

1. It constitutes a sustainable small scale employment use adjacent to a settlement limit; or
2. It constitutes live-work unit(s) immediately adjacent to a settlement limit in the Valleys Strategy Area only; or
3. It constitutes the small-scale expansion of an existing business or the suitable conversion of an existing building; or
4. It constitutes the appropriate replacement of an existing dwelling; or
5. It is an affordable housing exception site; or
6. It is an appropriate rural enterprise dwelling; or
7. It is an appropriate 'One Planet Development'; or
8. It is a sustainable tourism or farm diversification proposal that is suitable in a countryside location; or
9. It is associated with the provision of public utilities, infrastructure and waste management facilities that cannot reasonably be located elsewhere; or
10. It is associated with either agriculture, forestry, minerals or energy generation; or
11. It relates to the appropriate provision of accommodation for Gypsies / Travellers; or
12. It constitutes the provision of open space and small scale ancillary facilities adjoining the settlement limit.

Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form.

### **Policy AH 1 Affordable Housing**

All new housing developments, including conversions, on sites accommodating 3 or more units will be required to contribute to affordable housing provision. Affordable Housing Percentage Targets will be sought in the following spatial areas. Coastal Corridor:

- Neath - 25%
- Port Talbot - 25%
- Valleys: Pontardawe - 10%

The exact affordable housing contribution to be provided will depend on the circumstances of each proposal and the viability of the scheme. The provision of affordable housing will be implemented through the use of planning conditions, obligations and/or legal agreements between the Council, Developers and Registered Social Landlords.

### **Policy R 2—Proposals Within Retail Centres**

1. Within the designated retail centres, uses that would enhance the vitality, viability and attractiveness of the centre, including uses in classes(16) 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.
2. Proposals for the redevelopment or conversion within a retail centre of retail, commercial, leisure or community premises to ground floor uses not complying with point 1 of this policy will only be permitted where:
  - (a) It is demonstrated that the existing use is no longer viable or appropriate in the location; and
  - (b) The proposal would not result in the loss of a supermarket, shop, café or public house which is important in terms of providing facilities to serve the community; Or:
  - (c) The proposal would result in the redevelopment of derelict, unsightly, underused and vacant land / premises for alternative uses which would have significant social, community or regeneration benefits.
3. Within the designated Primary Shopping Streets in Neath and Port Talbot town centres, ground floor uses other than Class A1 (Shops) will only be permitted where:
  - (a) The proposal falls within Class A2 (Financial and Professional Services) or Class A3 (Food and Drink); and
  - (b) The proposal does not result in the overdominance of any non-A1 use; and
  - (c) The proposal on its own and/or in combination with other proposals and commitments does not lead to:
    - (i) A material adverse effect on the retail function of the Primary Shopping Streets; or
    - (ii) A material reduction in the number and distribution of shop premises within the retail frontage that it will occupy and within the Primary Shopping Streets as a whole.

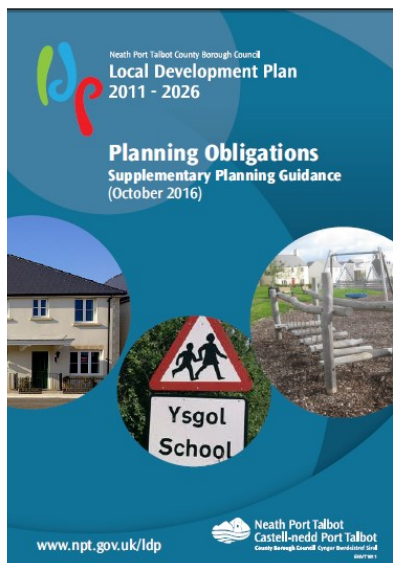
4. Within the district and local retail centres, proposals that would result in the over dominance of one use to the detriment of the vitality, viability and attractiveness of the retail centre will be resisted.

#### **Policy TR 2 Design and Access of New Development**

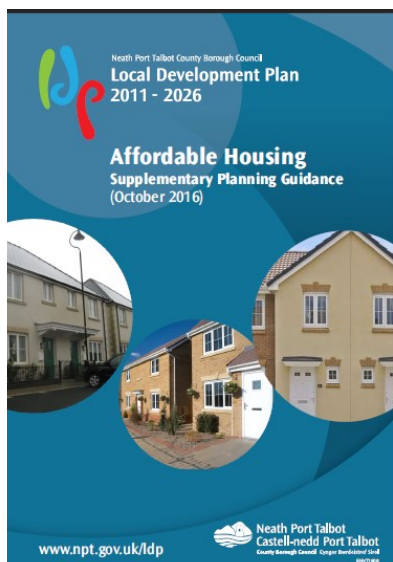
Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;
2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;
3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;
4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.

Relevant Supplementary Planning Guidance documents:



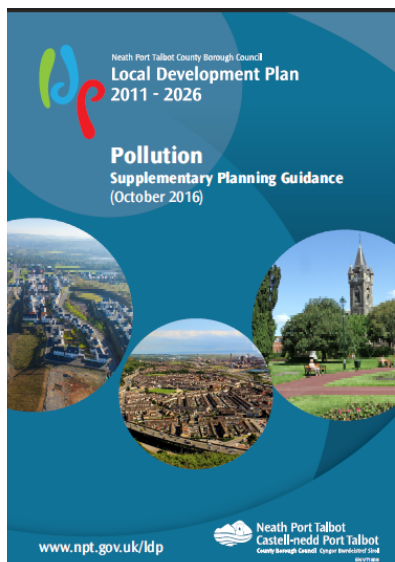
**Planning Obligations**



**Affordable Housing**



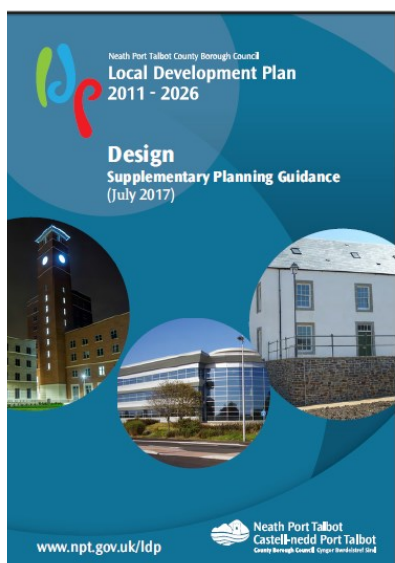
**Open Space and Greenspace Provision**



## Pollution



## Parking Standards



## Design

#### **4.0 Main Issues**

4.1 The main issues for consideration during the determination of this application relates to:

- the principle of this form of development at this location,
- the requirement for any section 106 requests,
- the impact of the development upon the visual amenity of the area,
- the impact on any adjacent listed buildings
- the residential amenities of the neighbouring properties
- the impact on highway safety
- Flood Risk

4.2 Careful consideration needs to be give to the aforementioned policies of the LDP and the Supplementary Planning Guidance documents.

#### **5.0 Principle of Development**

5.1 The site is defined as falling within the defined limits of Port Talbot Town Centre. Permission is sought for a the change of use of the existing building to residential accommodation and will provide:

- 6 x 2 bedroom flats.
- 5 x 1 bedroom flats.

5.2 The building will have approximately 17 residents and as a previously stated will be marketed for a mixture of affordable family/single parent accommodation or young professional accommodation.

5.3 The building is situated in an unusual location behind the main primary shopping frontage in a back-land location. The premises was previously a shop but planning permission was granted under P1989/7101 for the change of use to offices.

5.4 The growth of out of centre office spaces and home working has reduced the demand for office space in Port Talbot Centre. Lambeth Smith Hampton have marketed the property since September 2019 for offices, however they have had no interest in this 8 month time period—See Appendix A. LSH have concluded that there is going to be limited office demand for the building and suggest an alternative viable use should be found such as flats.

5.5 The site is adjacent to the main central train and bus stations and within the defined Port Talbot Centre which supports the introduction of residential uses such as this. The surrounding area is of no particular architectural merit and the redevelopment of this property will help accommodate the significant demand in the area for affordable accommodation in Port Talbot Centre and this will help address this need.

- 5.6 The general thrust of LDP Policies within Neath Port Talbot support the introduction of residential uses such as this which would result in the regeneration of the area and the introduction of residents into the area. The proposed residential use would increase the number of residents which would create footfall and activity which will help regenerate this part of Port Talbot Centre. The residents would positively contribute to how the Town Centre functions by taking advantage of its facilities and amenities. As promoted by both National and Local Planning Policies, the proposed use would make efficient use of a building that is currently underutilised. The development would result in the replacement of the empty office spaces with high quality residential units.
- 5.7 Port Talbot Centre has seen significant decline over the past 20 years, however there has recently been significant investment in the area. A number of businesses have closed over the years and the area is re-known for significant anti-social behaviour. NPT Council has launched a number of regeneration initiatives which have definitely begun to improve the area and it is hoped the approval of this application will help improve the character and appearance of the area. The approval of this application would help provide a meaningful alternative use for this vacant building which will help improve the area.
- 5.8 There is a large demand for new affordable accommodation within Port Talbot and this proposal provides the opportunity to re-generate a functionally obsolete property and introduce vitality via additional footfall into the defined retail centre which will have the knock on effects of re-generating small businesses like shops, café's pubs and leisure facilities which, by their presence will eventually bring back business users into the Central Area from their currently "preferred" out of town locations.
- 5.9 The site is located within Port Talbot's retail core which has been defined to encompass the main commercial functionality of the area. The policies within the LDP encourages the development of attractive, distinctive, mixed-use developments.
- 5.10 The proposed residential development will generate activity and footfall, and should help regenerate a dilapidated part of the Town Centre. As such the redevelopment of this vacant building to residential flats is acceptable in principle and is supported by both national and local plan policies.

## **6.0 Requirement for Section 106 requirements**

- 6.1 All new housing developments on site accommodating 3 or more units will be required to contribute to Affordable housing provision. The site is within the Port Talbot spatial area, which requires a 25% of unit's contribution towards affordable housing, with the first preference always being for the units to be provided on site as part of the overall development.
- 6.2 The accompanying Viability Assessment submitted in support of this application contends that the scheme is viably unable to make an affordable housing contribution. To support this, viability appraisal looks at property valuations, existing use value, construction costs and comparable sale valuations in line with the

requirements of the Supplementary Planning Guidance document entitled 'Planning Obligations'.

- 6.3 The building is currently in commercial use and has an existing use value. It is generally accepted that where a site has an existing use value, the land owner will undoubtedly require a premium on the land value in order to ensure a site is brought forward for development. From a purely economic regeneration perspective the Local Planning Authority should support this proposal in order to help contribute to the much needed regeneration of the town centre. Due to the costs required to convert the existing building there are significant development costs associated with the conversion and redevelopment of this site.
- 6.4 The Local Planning Authority must recognise that for this site to be developed the scheme must be viable in financial terms for the landowner to release this land for development and the developer to make a reasonable profit.
- 6.5 The accompanying financial viability assessment makes it clear that this site cannot be developed in a viable way which would be able to contribute towards affordable housing. As such the provision of affordable housing on this site could not be justified in this instance.
- 6.6 In terms of open space contributions, we will await further response from the Local Planning Authority in this respect.

## **7.0 Visual Amenity**

- 7.1 The existing two storey building has a tired looking façade which looks dated and is in major need of redevelopment. The existing commercial offices will be converted and replaced with high quality affordable residential units. The proposal will involve some minor external alterations to the pattern of fenestrations which will improve the visual prominence of the building when viewed from the street-scene.
- 7.2 The alterations to the building facades will have a significant positive impact upon the character and appearance of the building and the wider street-scene. It is felt that the design and external appearance of the proposal would have an acceptable visual impact on the surrounding area by respecting the existing built form in accordance with the LDP and the SPG Design Guide.

## **8.0 Residential Amenity**

- 8.1 The proposal will result in minor physical additions and given the sites city town location the proposal will not result in unacceptable overbearing or overshadowing to an extent which would warrant the refusal of this application.
- 8.2 In terms of the proposed residential use, in light of the existing use it is not felt that the introduction of 11 residential units would result in an over-intensive form of development at this Town Centre location.

- 8.3 The existing building has an extant commercial use which could potentially have a high level of usage. As such the change of use would not result in an over-intensive form of use.
- 8.2 In terms of overlooking the proposal will utilise existing openings where possible and the building is sited a sufficient distance from nearby residential properties to ensure there will not be unacceptable overlooking on the amenities of nearby properties. Furthermore, given the Town Centre location of the site whilst simultaneously ensuring there will not be unacceptable overlooking into the private amenity space of adjacent properties.

## **9.0 Highway Safety and Parking**

- 9.1 The proposal will have a centralised main entrance to the flats which helps emphasise a clear focal access point which will be compliant with the Equality Act.
- 9.2 The site is defined as falling within Town Centre—Zone 2 as defined under the provisions of the Supplementary Planning Guidance document entitled—Parking Standards. Zone 2 areas are limited to Town Centre and City Centre Fringe. Typically there is a wide range of public transport services, bus and rail.

**Existing Use** - The existing use is an office. The SPG would require 1 commercial space and 1 space per 20m<sup>2</sup>. The existing floor area of the 1st and 2nd floors is and as such the proposed use would generate a parking requirement of Xx spaces.

**Proposed Use**— The proposed use would generate a requirement 1 space per unit for residents and 1 space per 5 units for visitors. As such the proposed use would generate a requirement for approximately 13 parking spaces.

Having regard for the Sustainability Matrix in Appendix F of the SPG the site would score the following:

Local Facilities—More than 2 facilities within 200m of site—6 points.

Public Transport—Bus stop within 300m of site—3 points.

Frequency of Transport—Main central route through to Port Talbot Centre—3 points.

- 9.3 As such the site would score 12 points which would warrant a reduction in parking of 30% or 4 parking space. Therefore the site is in a highly sustainable location where parking would not be warranted. There is a car park adjacent to the site. In addition to this the site is within very close proximity to Port Talbot Train and bus stations. Therefore the site is within a highly sustainable location and does not therefore require the provision of designated parking.
- 9.4 If deemed necessary a travel plan could be obtained via an appropriately worded condition. The development will also provide a sufficient cycle storage for future residents which will provide an alternative sustainable method of alternative transport.

- 9.5 In light of the above the proposal is considered a significantly less intensive form of use than the extant lawful use as a gym. The proposal provides an alternative means of sustainable transport with the provision of cycle storage. The future occupiers will not be car reliant and as such the proposal is considered an acceptable form of use.

## **10.0 Flood Risk**

- 10.1 The application site is located in a Flood C1 Zone, where there are significant flood defence measures in place. A flood consequence assessment has been submitted in support of the application and it felt it is an appropriate form of use for this vacant office building.
- 10.2 The proposed use will find a viable alternative use for this building and is felt to be in compliance with the provisions of TAN 15.

## **11.0 Conclusion**

- 11.1 This part of Port Talbot is made up of a mixture of differing style properties and the existing building is in need of investment. The re-development of the site will help regenerate this part of Port Talbot and the proposal will result in modest external alterations to the pattern of fenestration and the complete refurbishment to the external facade which will help improve the visual appearance of the building and will result in an enhancement to the character and appearance of the area.
- 11.2 The proposal will introduce no overbearing or overshadowing issues over and above what is currently experienced. In terms of overlooking the scheme has been carefully to ensure the proposal will not result in detrimental overlooking into the amenity space of the neighbouring properties. Furthermore it is not felt that the provision of 11 residential units would result in an intensification of use over and above its extant office use which could warrant the refusal of this application.
- 11.3 In terms of the highway safety, the proposal will provide no car parking spaces however it will provide cycle storage as an alternative means of sustainable transport for the future residents. The site is situated in Port Talbot Centre and is in a highly sustainable location within the County. As such the site warrants a reduction in parking requirements and given its sustainable location within close proximity to the central bus station, employment opportunities and the main bus and train stations. In light of this and the fact that rented properties such as these tend to have lower car ownership it is felt that the development warrants the provision of no parking provision.
- 11.4 It should be noted that there are a number of local facilities within walking distance of the application site and if a Travel Plan is required, this could be secured via an appropriately worded condition.

- 11.5 From a social and economic perspective, the conversion of the building will bring back a vacant building into beneficial use and provide much needed employment for local tradesmen and supply chains and also provide much needed low cost units for a growing population. There is significant demand for 1 and 2 bedroom units in the local area and this development will help meet this unmet need. In addition to this the development will re-introduce residents into the Town Centre which will help support local businesses and improve the vitality and viability of the shopping centre.
- 11.6 As such the development is considered an acceptable form of development which complies with the provisions of the Local Development Plan and the Supplementary Planning Guidance documents. Therefore you are respectfully requested to support this proposal.