



## **PLANNING STATEMENT**

**Proposed Change of Use of First & Second Floors from Offices  
to Emergency Refuge Accommodation  
at 49 Talbot Road, Port Talbot, SA13 1HN**

**On Behalf of  
DGP Properties Limited**

**Our Ref:** 1292.a

**Date:** May 2021

**Prepared by:** Nia Powys

**Approved by:** Richard Banks

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## 1.0 INTRODUCTION

- 1.1 Evans Banks Planning has been instructed by DGP Properties in preparing a re-application for Full Planning Permission for *“Change of Use of First & Second Floors from offices to emergency refuge accommodation”* at 49 Talbot Road, Port Talbot.
- 1.2 This Planning Statement has been prepared as part of the planning application and its contents should be read in conjunction with the submitted plans. It has been prepared based on the nature and type of the above proposal, and the proposed scheme has been assessed against the following key areas, as well as the site’s context:
- Character
  - Local Development Plan Policies
  - Environmental Sustainability
  - Movement to, from and within the development
- 1.3 This re-application follows the decision on 24<sup>th</sup> May 2021 by the Applicants to formally withdraw Application P2021/0323. That application sought full planning permission to *“Proposed Change of Use of First and Second Floors from A2 Use to Sui Generis, along with retaining the mixed commercial use at ground floor. The upper floor are bedsit rooms of a homeless charity to house emergency families. The upper floor will have a rear extension.”*
- The Council in validating this submission varied the description of development to: *“Second storey rear extension to facilitate change of use on 1st and 2nd floors to 14 number self-contained flats to accommodate emergency families from homeless charity. Commercial use to remain on ground floor.”*
- 1.4 During formal consultation with internal Departmental consultees, the application appears to have been assessed as one where open market residential apartments are being proposed, which in turn would require provision of off-street car parking. Furthermore, the assessment attracted LDP Policy requirements for financial contributions to local Play and Education facilities, together with an on-site contribution to Affordable Housing. The form and nature of the proposals are **not geared** to any occupancy by individuals for sale or formal rent, instead the Emergency Refuge Accommodation will be wholly managed by a registered Charity who specialise in providing care and domestic assistance to persons in need of temporary overnight accommodation.
- 1.5 Within this re-application, this Statement will aim to provide specific details of the specialist form of accommodation proposed, which is more akin to the original application wording, but in this re-application provide justification as to why the proposals should not be examined in line with general residential planning policies within the Neath-Port Talbot Local Development Plan, and rather treated as a genuine exception based on a specific and specialised housing need.

## 2.0 SITE ANALYSIS AND CONTEXT

### 2.1 SITE ANALYSIS

- 2.1.1 The application site relates to a detached building, set off the western flank of the A48 Talbot Road, close to Port Talbot town centre. The building consists of three-storeys in total, which situates itself at the end of a terraced housing row. The ground floor contains large shop-front style windows with two access doors; one in the centre and one to the right of the front elevation, and provides for commercial office space. The upper floors have previously been in office use and are now under renovation. The eastern gable of the building faces onto a small access lane which allows for limited off-street parking. To the rear of the building lies private staff parking for Port Talbot Parkway station, which is located less than two hundred metres distant.
- 2.1.2 The setting of the application is this part of Taibach is shown at Figure 1 below, whilst an aerial image produced by Google Earth forms Figure 2. The Ordnance Survey map extract illustrates the setting of the site as edged in red at Figure 3.

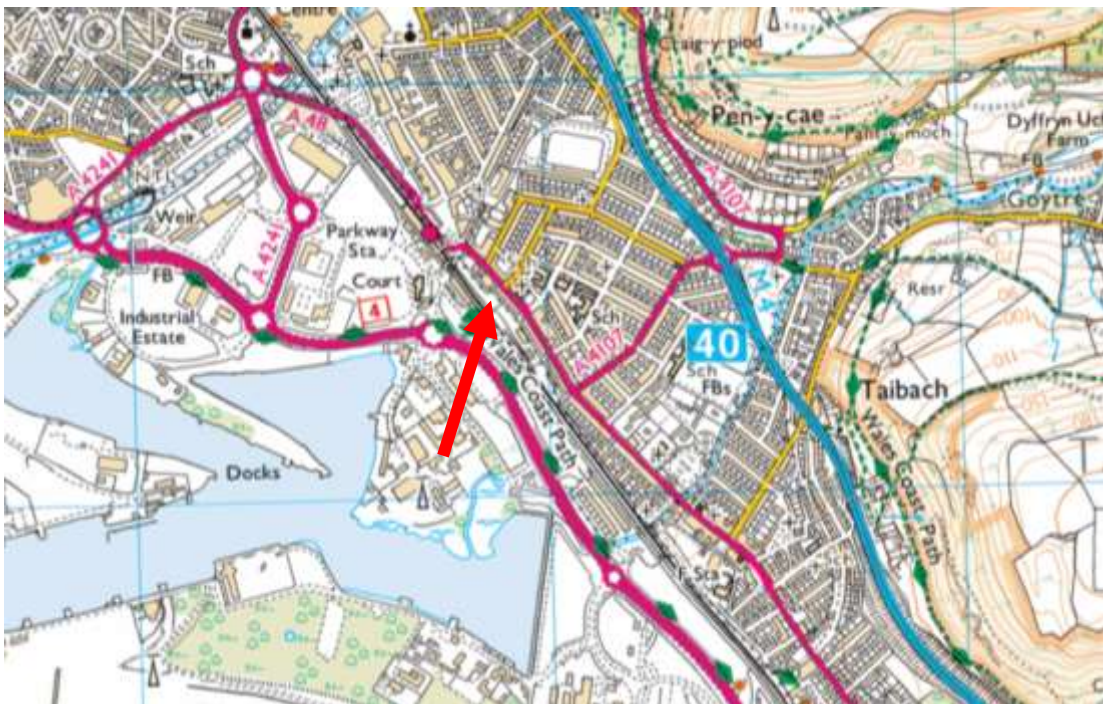


Figure 1 – Location of site at Talbot Road



**Figure 2 – Google Earth image of application property**



**Figure 3 – Ordnance Survey map extract of site edged in red**

- 2.1.3 From Talbot Road, the property appears as a conventional and unremarkable three-storey building, set under a saddle, tiled roof, with wide upper floor windows to front, rear and eastern side gables, as shown in Photographs 1 and 2 below.



**Photograph 1 – Front view of application site**



**Photo 2 – view looking west towards application building**

- 2.1.4 The second floor of the building is currently occupied as offices for a well-known charity which specialises in homeless care and welfare. The first floor of the building is

currently vacant. The ground floor is also currently vacant however the charity wishes to relocate their offices here and retain the current use of the ground floor.

- 2.1.5 The upper floors of the building can be accessed via the right hand front door to the property, which leads to an internal stairwell. The property has been long-since extended to the rear and a two-storey flat-roofed extension is visible from neighbouring land to the rear.

## **2.2 SURROUNDING LOCALITY & SUSTAINABLE SETTING**

- 2.2.1 The application site is set within a mixed residential and commercial area, where traditional terraced housing is established alongside flanking Talbot Road, and where modern multi-storey residential apartments have been formed through the redevelopment of former commercial buildings. An emphasis on smaller, more modest, residential tenures is prevalent, with individual housing tending to display varying extensions to the rear of properties, linear rear gardens and on-street car parking proliferating, usually in the form of dedicated on-street parking bays.
- 2.2.2 The locality is highly sustainable, being in close proximity and easy walking distance to Port Talbot town centre, where there are good public transport links to the surrounding area and further afield. Port Talbot Parkway station is approximately 170m north-west of the site's entrance. This rail station serves towns and cities both East and West of Port Talbot, including Cardiff and Swansea.
- 2.2.3 Regular and frequent bus services are available with public stops serving both directions located directly abutting the site. Routes include Services 66, 87, X1, X3 and 86 which directly serve Neath, Swansea and Aberavon on a frequent basis throughout the week as confirmed by the "Traveline Cymru" website.
- 2.2.4 Walkers and cyclists are also well catered for with the Wales Coastal Path also passing directly behind the application site. Figure 4 below provides an illustration of the multiple non-car modes of public transport available close to the application site.
- 2.2.5 The surrounding area is a mixture of residential, retail and business units due to its proximity to Port Talbot town centre, with those commercial entities being usually sole traders providing conveniences shops or local offices serving the general community.
- 2.2.6 Talbot Road forms part of the A48 road network being the principal local distributor road linking Port Talbot town centre with the communities located south-east through Taibach to Margam. The carriageway is exceptionally wide at this point, offering complete two-way segregation, and still providing space to accommodate on-street parking intermittently off both flanks of the highway. Footways are generous providing

complete pedestrian refuge and segregation. Side roads tend to be constrained by double-yellow markings, with some restricted to one-way traffic flows.



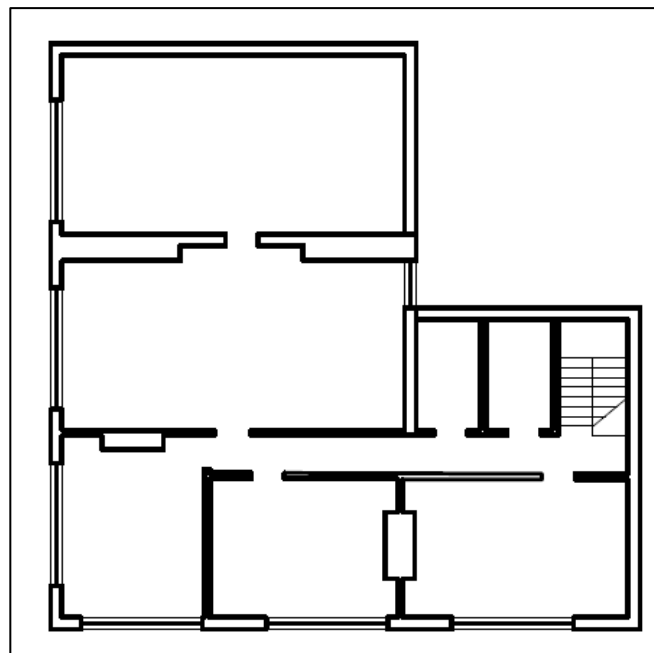
**Figure 4 – Available Sustainable transport links near Application site**

## **2.3 PLANNING HISTORY**

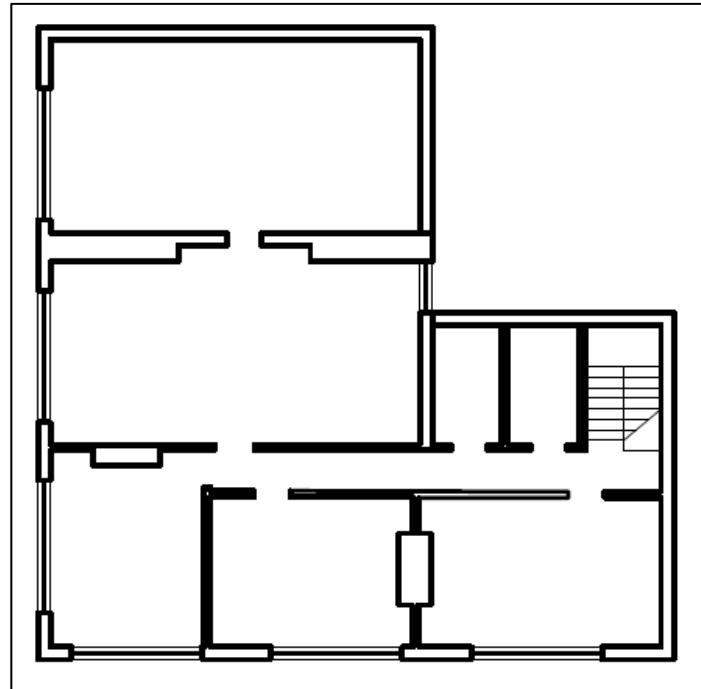
- 2.3.1 In terms of the planning history, the building sought a change of use to incorporate a tool hire centre to an existing garage in 1990 via Planning Permission P1990/1996 but the status of this is unknown.
- 2.3.2 Much later in 2012, the building was granted a change of use from an office and training building to financial and professional use (A2) under planning permission P2012/0168, which is still current today.

### 3.0 PROPOSED DEVELOPMENT

- 3.1 The proposal seeks to provide Emergency Refuge Accommodation within the first and second floor of 49 Talbot Road as shown in Plans A to D below. The proposed change of use will not require any external works or physical extension of the building, with the accommodation being contained within the current floor layout of the building, and the structure of room being sub-divided to create individual occupant spaces aside of communal corridors being formed.
- The recently withdrawn Application referenced P2021/0323 sought to construct a rear extension at second floor level to accommodate more bedspaces. This proposal is no longer required and has thus been **omitted** from these re-application proposals.
- 3.2 The proposed bedrooms will accommodate vulnerable individuals who are seeking emergency temporary refuge. The accommodation will be managed by the same registered charity who intend to occupy the ground floor. The registered charity will provide counselling and welfare support for the vulnerable individuals.
- 3.3 Each unit contains everything that is required for an overnight or temporary short stay. Each room contains a bed, small kitchenette and seating area. There is also an en-suite which contains a shower, toilet and sink within each room. The emphasis is upon limited stays of only a couple of nights, with the limited individual floorspace impractical to offer anything more than that timescale. The intent is to offer a temporary solution to an individual's homelessness, and to guide and steer that individual to more permanent accommodation elsewhere in association with local authority and housing association support networks.



Plan A – Existing first floor layout



**Plan B – Existing Second Floor Layout**



**Plan C – First Floor Proposed Layout**



**Plan D – Second Floor Proposed Layout**

## 4.0 SUSTAINABILITY & FORM OF PROPOSALS WITHOUT NEED FOR DEDICATED ON-SITE PARKING PROVISION

- 4.1 The temporary accommodation will provide for very short-term overnight stays by low-income or no fixed income individuals, meaning they are highly unlikely to have their own private means of transport. Those individuals are therefore highly reliant on public transport in the site's locality, and not therefore dependent upon any need for dedicated on-site parking provision, or indeed the availability or not of on-street car parking bays at Talbot Road and surrounding streets.
- 4.2 To warrant being treated as an exception to normal Supplementary Planning Guidance upon Parking Standards, the scale of each bedspace needs examination. As shown above, the accommodation offered is limited to one room, typically being **only 15 square metres floorspace per room**, and thus falling well below any habitable standard to be considered suitable for any form of permanent long-term accommodation. Photos 3 and 4 below provide a snapshot of the limited scope of the proposed temporary accommodation.



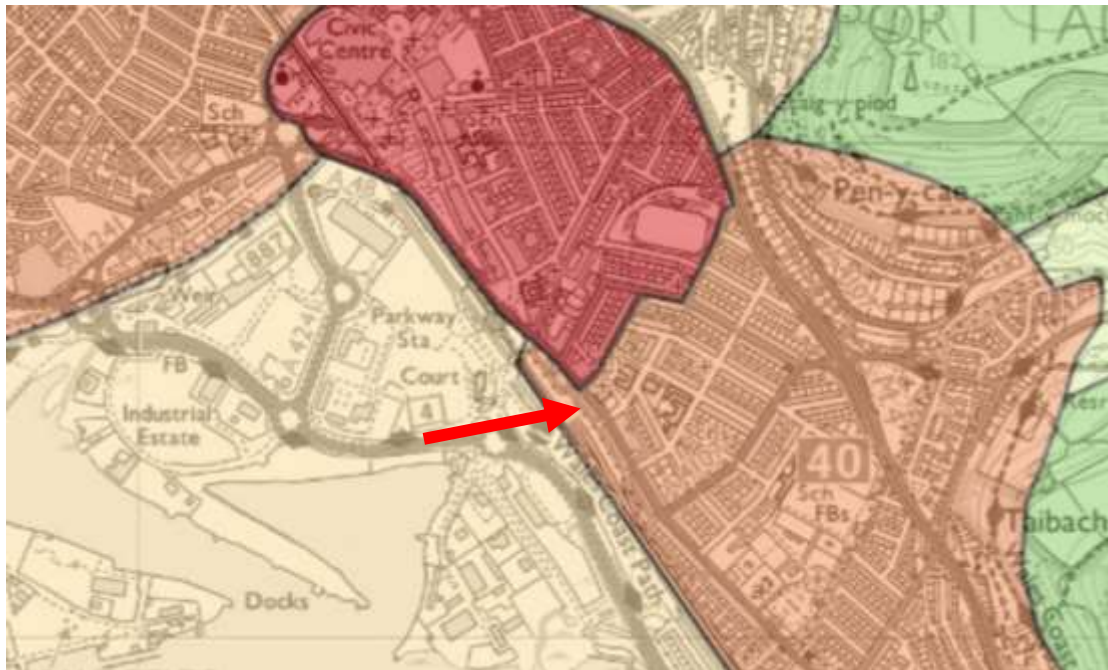
Photo 3 – typical single occupancy room



**Photo 4 - typical single occupancy room**

- 4.3 The relevant Supplementary Planning Guidance “Parking Standards” was adopted in October 2016. Neath-Port Talbot CBC subscribe to the regional standards presented with the CCS Wales Parking Standards 2014, which designate Zones, for which different criteria apply when assessing the level of car parking required for residential developments.

Talbot Road is very much part of the urban area of Port Talbot, which stretches from the A48 / M4 corridor at Margam to Port Talbot Town Centre. The SPG at Appendix A provides designated Parking Zones Map, with Plan 13 being relevant to this part of Taibach, and which is reproduced below at Figure 5.



**Figure 5 – NPT SPG – Parking Standards – Parking Zone Map 13**

- 4.4 The property at 49 Talbot Road is set at the fringe of Zones 2 and 3, just falling into the latter, and thus it is defined as an “Urban” zone is one defined as *“Very much part of a substantial built-up area with a number of basic local facilities within 400m walking distance. A range of bus routes offering up to 6 buses per hour; the range of destinations offering practical access to most but not all essential facilities. The curtilage of the site restricts, to an extent, what car parking can be provided. There are likely to be some restrictions on on-street parking and other available off-street parking is severely limited or non-existent.”*

The SPG Parking Standards categorises an Urban zone as **Zone 3**.

- 4.5 Paragraph 3.2.2 of the SPG indicates that *“in assessing the parking requirements for a particular development, the planning authority will need to take into account the following factors in relation to the development and its location:*

- *Accessibility to and the service provided by the public transport system;*
- *The availability of private buses or the extent of car-pooling;*
- *The relative proportions of full time / part time / local catchment of labour;*
- *Accessibility by walking and cycling;*
- *The existing and possible future congestion in streets adjacent to the development; and;*
- *Accessibility to and the availability of public and/or private car parking space in the vicinity.*

- 4.6 The SPG at paragraph 4.1 in providing guidance on “Residential – New Build and Conversions” states that *“for developments where clear evidence has been supplied that car ownership levels will be lower than normal, a more flexible approach to numbers of parking spaces may be taken.”*

As mentioned in the Sustainable Location section, the location of site is ideal for encouraging sustainable travel due to its proximity to Port Talbot Parkway rail station which is located approximately 170m North-West of the building. There are also two bus stops serving opposite directions directly outside the building which provide direct transport to Neath, Swansea, and Aberavon. Additionally, the Wales Coastal path runs directly behind the building which can encourage active travel via foot and bicycle.

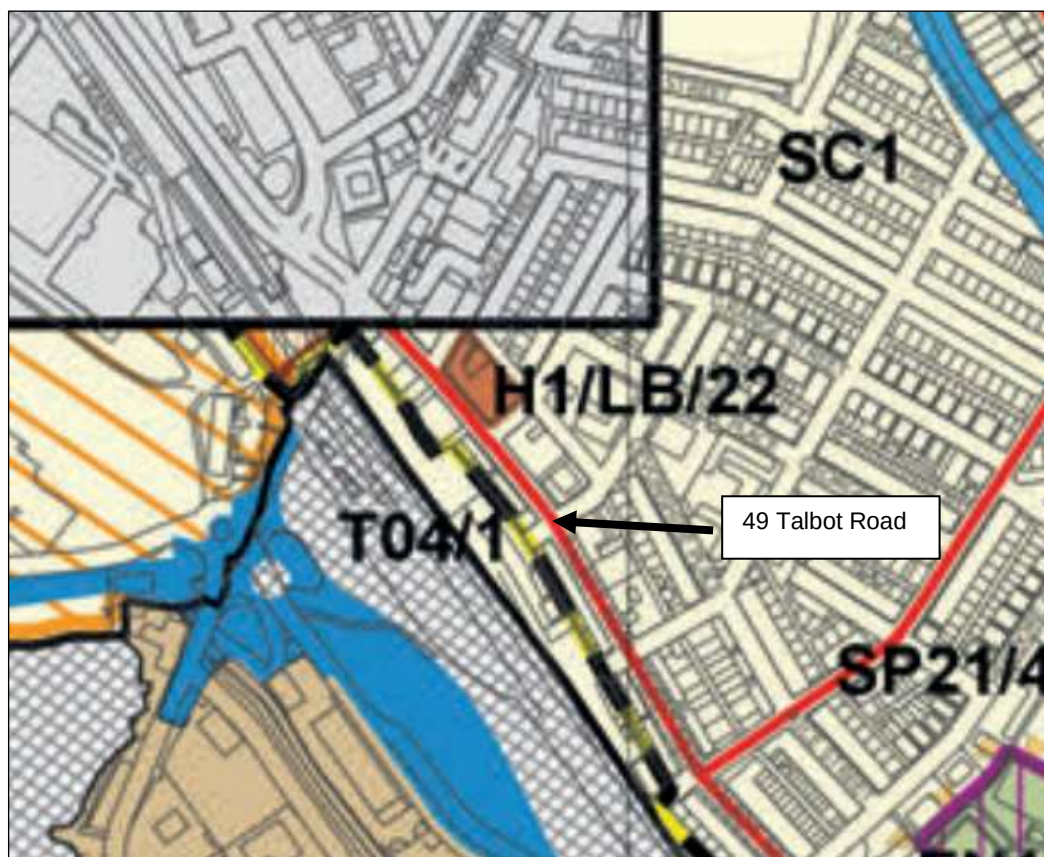
- 4.7 The proposals comprise of simple **non-rented**, one-bedroomed accommodation, aimed at “no income individuals”, who will be **unlikely to own / use a car**. A small number of parking spaces are currently available within the side access lane, and therefore available for Charity staff parking. Paragraph 4.1 of the Council’s SPG in circumstances where there is clear evidence that car ownerships will be lower, advocates that a “more flexible approach” in taken.
- 4.8 Talbot Road benefits from immediate pedestrian access along the A48 where an array of small retailers and community facilities are to be found. Temporary occupants at the 49 Talbot redevelopment will be able to walk uninterrupted along the A48 as a result

of continuous and wide pavements along both flanks of the street. Local convenience food stores lie only 5 minutes' walk north-west of the site, with a range of cafes and hot-food-take-aways, together with laundrette, pharmacy and library to be found closer and en-route.

- 4.9 The use of the upper floors for dedicated Emergency Refuge Accommodation can therefore be described as falling into this exceptional circumstance. The whole ethos behind such a type of accommodation is that they provide temporary accommodation for the very vulnerable and most disadvantaged members of the public, being those in desperate housing need, which has arisen through direct exposure to homelessness or even domestic abuse and isolation.

## 5.0 PLANNING POLICY

- 5.1 The development plan in form for the purposes of Section 38(6) of the Planning & Compensation Act 2004 is the Neath-Port Talbot Local Development Plan, which was adopted in January 2016.
- 5.2 The application site is located within the settlement limits of Port Talbot which is shown from the reproduced Proposals Map from the LDP in Figure 6. This relates directly to Policy SC1 'Settlement Limits'. The proposal adheres to this policy as the scale and form of the building remains unchanged externally, having no impact on appearance or character of the surrounding area.



**Figure 6 – LDP Proposals Map extract of Port Talbot**

- 5.3 Policy SP3 'Sustainable Communities' aims provide a range of diverse functions served by a range of transport options as the site is located within the town of Port Talbot. Due to the ample public transport links and the niche service the proposed use provides to the most vulnerable in the community the proposal complies with this policy.
- 5.4 Policy SP1 'Climate Change' seeks to create more sustainable travel patterns relating to criterion 1. As noted in the 'Sustainable Location' section the proposal encourages

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sustainable modes of transport due to the nature of the expected users and sustainable transport links within the vicinity.

- 5.5 It is noted that the LDP does not contain any direct planning policies or proposals for Special Housing or temporary accommodation needs. **In such cases, we submit that each proposal be considered on its unique material circumstances, and where necessary detailed conditions can be used to control the form of accommodation to ensure it performs and meets this specific housing need.**
- 5.6 The LDP points to the requirements of Housing Schemes to make provision where three or more units are created to provide for Affordable Housing and financial contributions to Play and Open Space. Supplementary Planning Guidance sets out the terms and method of calculation for such on-site and off-site financial contributions.
- 5.7 During the assessment of Planning Application P2021/0323 the Applicant was presented with the consultation response from the Planning Policy Team dated 15<sup>th</sup> April 2021, where such requirements for adherence to Affordable Housing and Open Space policies was highlighted.

However, in response, this re-application seeks permission for a **specialist form of temporary accommodation** geared at the proposed facility being **wholly managed** by a Registered Charity. Accordingly, the proposed use is not general housing, nor 100% Affordable Housing, and does **not constitute** accommodation where occupants live independently from that managing Charity “landlord”. In other words, the overnight occupants are governed by the strict terms and conditions applied by that supervising Charity and are individuals who do not make daily use of Council community facilities in the same manner as the general public.

## 6.0 CONCLUSION

- 6.1 This Statement has illustrated that the proposals meet the underlying policies of the Neath-Port Talbot Local Development Plan, and specifically strives to make productive use of the upper floors of an existing building, in providing a specialist form of temporary accommodation, wholly managed by a Registered Charity.
- 6.2 The proposed use will encourage sustainable travel patterns within the area due to its appropriate location to public transit stops and active travel routes. The unique type and form of the accommodation does not necessitate that the user will be a car traveller, and instead will be wholly reliant on public transport and non-car means of movement.
- 6.3 As this application relates to just a change of use, there will be no impact on the surrounding visual or character of the area. The ground floor “shop front” of the building will remain as existing and in doing so be the dominant focal point of attention for passers-by.
- 6.4 We therefore submit that this Planning Application should be assessed against the contents of this Statement, which has demonstrated that the proposals can comply with Local Planning Policy and be subsequently granted full planning permission, subject to appropriate specific conditions **to control and define specialist temporary accommodation** by only individuals in eligible need of such a facility.