

1487:PL:DAS-Rev 1

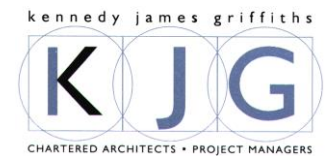
Design & Access Statement

for

Proposed Residential Development

At

Eagle House Port Talbot



1.0	Vision & Introduction	2	Amount	16
	Application Description	3	Site Layout	17
	Existing Use	3	Apartment Layouts	19
	Previous Planning History	3	Scale	19
2.0	Site and Context Analysis	4	Appearance	20
	Culture & Community	4	Landscaping/Ecology	21
	Site Location	4	Biodiversity	22
	Planning Context	6	Community Safety	22
	Surrounding land & Buildings Use	6	Environmental Sustainability	22
	Neighbourhood Structure	8	Materials	22
	Consultation & Engagement	9	Energy Efficiency	22
	Socio Economic and Market Analysis	10	Transport	23
	Landscape	10	Waste	23
	Topography	10	Waste Minimisation Strategy	23
	Access Points	10	Drainage	23
	Boundaries	10		
	Existing Building	11	4.0	Planning Policy/Consultation
	Blue & Green Infrastructure	11		National Planning Policy
	Ecology	12		Planning Policy Wales
	Ground Conditions/Constraints	12		Technical Advice Notes:
	Microclimate	12		Local Planning Policy
	Movement & Infrastructure	13		Planning Appraisal
	Road Hierarchy & Access	13		Consultation
	Public Transport	14		Flooding NRW
	Utilities & Infrastructure	14		Coal Authority
	Built Form	14		Pre-Application Advice
	Urban Form	14		
	Building Scale, heights and Density	15	5.0	Access Statement
	Strengths, Weaknesses, Opportunities and Threats	15		Movement to and from the Site
	Strengths	15		Pedestrian Access
	Weaknesses	15		Cycle Access
	Opportunities	15		Vehicle Access
	Threats	15		Public Transport Access
	Design Brief:	15		Movement within the site and buildings
3.0	Design Analysis	16		Parking
	Design Development/Evaluation	16		Sustainability calculation
	Access	16		Cycle Parking
	Movement	16	6.0	Summary and Conclusions
	Character	16		
	Use	16		

1.0 Vision & Introduction

Our Client, Castell Construction Ltd, have acquired an option on a site, Eagle House on Talbot Road, Port Talbot and wish to develop the site to provide high quality 100% affordable housing units to be owned and operated by a Registered Social Landlord (RSL).

An in-principle agreement has been reached with Tai Tarian, a local RSL that the scheme will be purchased when complete and operated as 100% affordable housing on tenures to be agreed.

Tai Tarian is one of the largest Social Housing landlords in Wales. They are based in Neath Port Talbot and were established in 2011 following a Large Scale Voluntary Transfer of stock from the Local Authority. They have a Head Office in the outskirts of Neath, with satellite offices located in Neath and Port Talbot Town Centres.

They provide in excess of 9,000 good quality, affordable and sustainable properties to their tenants, with a range of services to help them manage their homes.

They have proudly pledged to become a carbon neutral organisation by 2030 and are well underway making positive changes to the way they operate within the business.

Their Head Office address is:

Tŷ Gwyn,
Brunel Way,
Neath,
Neath Port Talbot,
SA11 2FP

The area has been identified by the Local Authority as having an affordable housing need and the proposed scheme will assist in addressing this need.

At present the proposed development is identified on the reserve housing (PDP) list with an expectation that it will be transferred to the full list at the next review.

Kennedy James Griffiths (KJG) have been retained to develop a design for the redevelopment of the site, working to a brief and specifications provided by the Applicant and Tai Tarian.

The design concept as set out in a brief prepared by Castell and the RSL was to provide a mix of high-quality and sustainable 1 and 2 bedroom affordable apartments, in a layout that is respectful to the site and creates a quality living environment for residents. The design is to be aesthetically pleasing and, where appropriate, complimentary to the existing character of the area as defined in the site context analysis.

All apartments are to be fully compliant with Welsh Government's Design Quality Requirements (DQRs) including Lifetime Homes, RNIB Standards and Secured by

Design compliance to enable the project to be funded by the Social Housing Grant (SHG).

In addition to the above the design has to respond to the Tai Tarian' broader vision as set out below:

Vision "Making a Difference"

As a committed, forward thinking Community Housing Mutual; we continually work to understand the needs of our customers, communities and of our planet facing a climate crisis. These three areas are at the forefront of all we do as an organisation.

We aim to be the landlord, employer and partner of choice within the Borough and areas beyond.

With the urgent need for Wales to provide more affordable and sustainable homes to meet demand; we are excited to continue with the delivery of a considerable proportion of such properties.

Our vision of our homes, communities and carbon neutral pledge in summary:

- *Properties to be of a good quality with affordable rents for tenants*
- *Properties to be safe, secure and fit for purpose*
- *Properties to be sustainable with mindfulness of future changes to utility provisions which benefit the planet*
- *To listen to and take forward our customers' needs and suggestions in property and community matters*
- *To achieve Energy Performance rating A as a minimum with new build properties*
- *To improve the Energy Performance rating upon refurbishment of existing properties*
- *To engage in modern methods of construction with innovative energy saving designs*
- *To minimise service charges for tenants*
- *To employ local staff, contractors and services*
- *To achieve value for money*
- *To implement the principles of the circular economy and maximise any potential to invest and contribute to the Foundational Economy*
- *To invest in communities to help reach their full potential to be enjoyed by all*
- *To create and engage in projects encouraging biodiversity.*

Further to the above brief and following detailed negotiations it has been decided that the proposed accommodation will be designed to be Zero carbon is use. This will be achieved by the use of Ground source heat pups along with Solar PV as set out in detail in the Sustainability section of this document.

Application Description

A scheme has been prepared and a Full Planning Application is being submitted. This document has been prepared in support of the application as required by the Town & Country Planning (Development Management Procedure) Order 2009.

This document is set out in accordance with guidance from TAN 12: Design (appendix A1), Design Commission for Wales guidance 'Design and Access Statements in Wales: Why, What and How' and Neath Port Talbot Council's published guidance documents. It describes the Proposal and sets out the design process that has resulted in the proposed development.

The application submitted is a Full Planning Application for the 'Demolition of Existing Office Building and the construction of 20 affordable housing apartments and ground floor commercial/office units along with associated parking and external areas.

The nature and scope of the Proposal is clearly set out on the following drawings and documents which have been included in the application:

Drawing /Document Title	Description
1487: PL1:01	Location Plan (A3)
1487: PL1:02	Site Analysis Plan (A3)
1487: PL1:03	Existing Site/Demolitions Plan (A1)
1487: PL1:04	Proposed Site Plan (A1)
1487: PL1:05	Proposed Floor Plans (A1)
1487: PL1:06	Proposed Elevations (A1)
1487: PL1:07	Existing/Proposed Context Elevations (A3)
1487: PL1:12	Site Management Plan (A3)
P3404-Sheet 1	Existing Topographical Survey
1487:PL1:DAS	Design & Access Statement
1487:PL1:PAC	PAC Report
1487:PL1:TP	Travel Plan
1487:PL1:CEMP	Draft Demolition & Environmental Management Plan
90617-CastellGrp-EagleHs_v1_020621	Flood Consequence Assessment
	Drainage Plan/Strategy (to follow)
	SUDS/SAB Application (to follow)
P1876 Eagle House, 13-5-2021	Bat Survey

P1876 Eagle House, Port Talbot-03-08-2021	Further Bat and Nesting Bird Survey
21035R1 - Phase 1 Desktop	Contaminated Land Desktop Survey
8972, Eagle House - 1st Issue	Noise Survey
Eagle House -A4 sewer	DC/WW Sewer plan

More detailed descriptions of the proposed design and layout are provided in Section 3: Design Analysis, of this document.

Existing Use

The site and existing building is currently an office/commercial unit with associated parking.

The site located on the corner of Talbot Road (A48) and Oakwood Lane in the centre of Port Talbot. See Site & Context Analysis for further details.

Details of the existing site layout and buildings are shown on the submitted drawings and the site is described in detail in the next section.

Previous Planning History

Neath Port Talbot Council's website was consulted to establish any previous planning applications for the site. The relevant applications are listed below:

Ref	Description	Decision
P2012/0285	Change of Use public convenience to office use	Approved
Q/2017/0040	Pre application advice for Retail Units and apartments	Advice provided

Pre application planning advice (Q2020/0101) has been obtained from the Local Planning Authority and the proposed scheme has responded to the advice given and this Planning submission includes the additional information requested as part of the advice received.

Pre-Application Consultation has also been carried out as set out in Section 4, and a PAC Report has been prepared.

In addition, a number of recent planning approvals for developments in the local area have been studied to enhance the understanding of the area in general and Planning Policy in particular. These applications include:

- P2019/5237: Redevelopment of the former Plaza Cinema
- P2015/0641: Affordable Housing at Former Port Talbot Police Station.

2.0 Site and Context Analysis

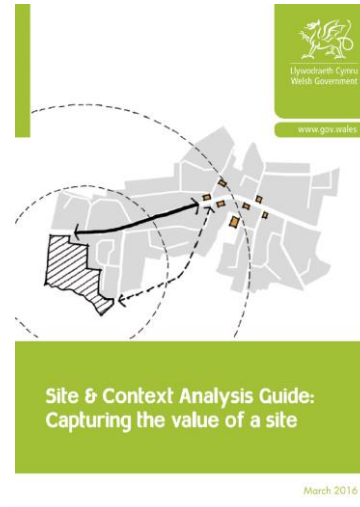
A full understanding of a development site is a crucial part of the design process. To facilitate this understanding a full site and context analysis has been carried out. The analysis as set out below has been based on guidance provided in the Welsh Government publication “*Site & Context Analysis Guide: Capturing the value of a site*”.

This document sets out 4 main headings to guide the Site and Context Analysis:

- Culture & Community
- Landscape
- Movement & Infrastructure
- Built Form

These sections are included below with diagrams and photographs as appropriate to further enhance the site analysis and identify the Strengths, Weaknesses, Opportunities and Threats presented by the site.

To assist in the evaluation of the site a Site Context Analysis drawing (1487:PL 02) has been prepared. This is included in the submission and is reproduced below for reference.



“Design which is inappropriate in its context, or which fails to grasp opportunities to enhance the character, quality and function of an area, should not be accepted, as these have detrimental effects on existing communities.”

TAN 12: Design, Welsh Government, para 2.6

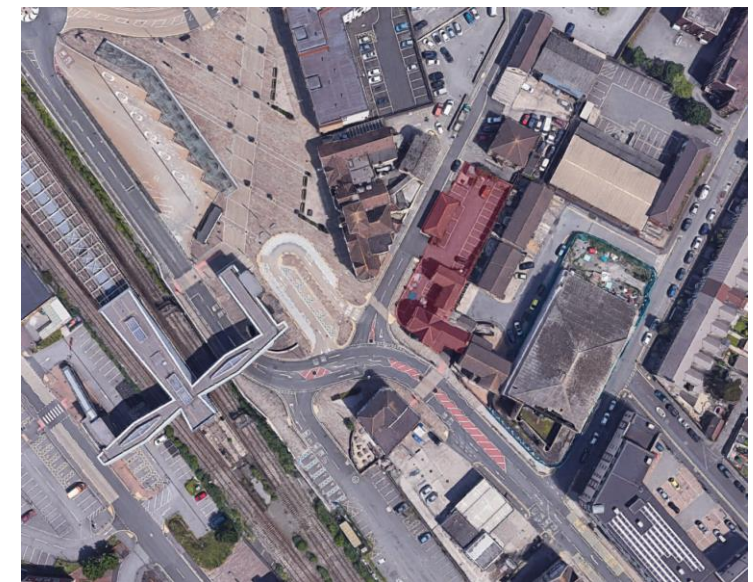
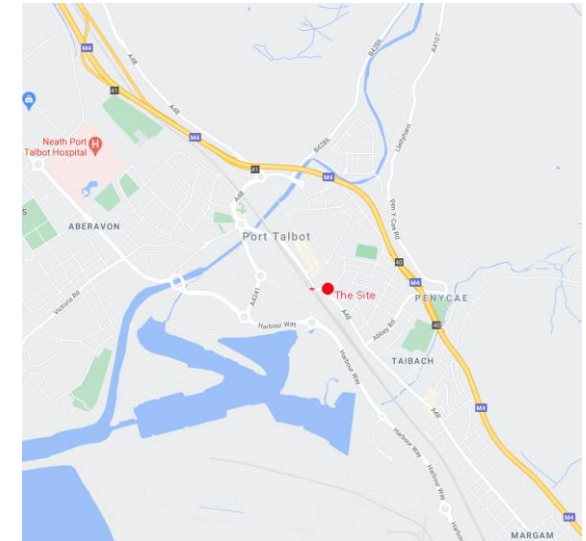
Culture & Community

Site Location

The site location is shown on the drawing 1487:PL1:01 and the following aerial photograph and map and lies in the settlement area of Port Talbot, close to the Town Centre and within the Port Talbot Ward.

The full site address is:

Eagle House
2 Talbot Road
Port Talbot
Neath Port Talbot
SA13 1DH



Above:
Location
map
showing the
site, The
main Town
Centre
(yellow) is to
approx. 2-
400m to the
North West

Right:
Aerial view
of the site
(marked in
red).

Port Talbot is one of the two major towns in the administrative authority of Neath Port Talbot Council, along with Neath. Port Talbot, along with Aberavon and the surrounding area is the largest town in the county by size and population. The Town benefits from a large retail centre, includes a range of local amenities within a relatively compact area and is well connected to the wider region by public transport and road links.

There is a main line train station (London/Swansea), within the Town Centre, a bus station serving the wider region and the M4 and A48 are easily accessible (with 750m and 5m of the proposed site respectively).

The site is urban town centre in nature and the immediate surroundings are a combination of commercial, former leisure and residential properties of varying heights and densities.

The area around the site has undergone significant change in recent years with new residential development along with a major realignment of the A48 to accommodate major transport hub which is within 30m of the proposed site (see later).

The site itself is located in a busy edge of town centre location, within easy walking distance of the Town Centre (100-500m), and other local amenities including Schools, shops, restaurants, leisure and healthcare facilities. Further details are included in the Access Statement later in this document.

The site is well connected to local transport infrastructure as Talbot Road (A48) is one of the main arterial roads into the town linking directly to the M4 which is approx. 1km actual driving distance to the East and approx. 1.5km to the North.

There are a number of bus stops on Talbot Road in addition to the main bus station and train stations which are located less than 100m to the North of the site.

There are cycle routes within a reasonable distance of the site which connect to the wider cycle network in and around Port Talbot as set out later in this document.

The site is classed as a sustainable location and scores highly in the Local Authority Sustainability calculator in the Parking SPG as set out in the Access section of this document.

There are public open spaces and recreation areas within easy walking distance of the site including Port Talbot Memorial Park approx. 600m to the South on talbot Road.

The site is well located to provide plenty of opportunity for employment within reasonable walking and cycling distance. The easy access to Public transport and major road links increases the availability of employment to a regional level with limited detriment to the environment.

The site area is approx. 0.1Ha.



Planning Context

The site is within the settlement boundary and the principle of development for mixed commercial/retail and residential purposes has been generally agreed by way of the pre app advice received (Q2020/0101). The proposed use is generally in accordance with the LDP and Supplementary Planning Guidance.

The site is in an inherently sustainable location and is well served by Public Transport.

The proposed development offers affordable residential accommodation in an area of identified need and it is anticipated that it will be listed on the local PDP.

The pre application advice raised a number of issues that required addressing in any planning application and this document intends to demonstrate how those issues have been resolved. The key matters identified can be summarised as:

- The site lies at the edge of a C1 Flood Zone and this will need to be addressed as part of the planning application,
- The site is within the Port Talbot Air Quality Management Area (AQMA),
- The existing building on the site is identified as 'A Building of Local Importance' within the Supplementary Planning Guidance (SPG): The Historic Environment (April 2019) which supports policy BE2: Buildings of Local Importance. Any proposed design should be of sufficient design quality to mitigate the loss of the existing building.
- The Council's records show that there is potential for Historic Ground Contamination within the site,
- The proposed development should seek to restore a continuous footpath along the western boundary,
- The site is located in close proximity to the Grade II Listed Plaza Cinema. The impact on the Listed Building is material consideration and should be addressed in the submitted Design Statement.
- On site parking will be required in accordance with the Local Authority Parking SPG

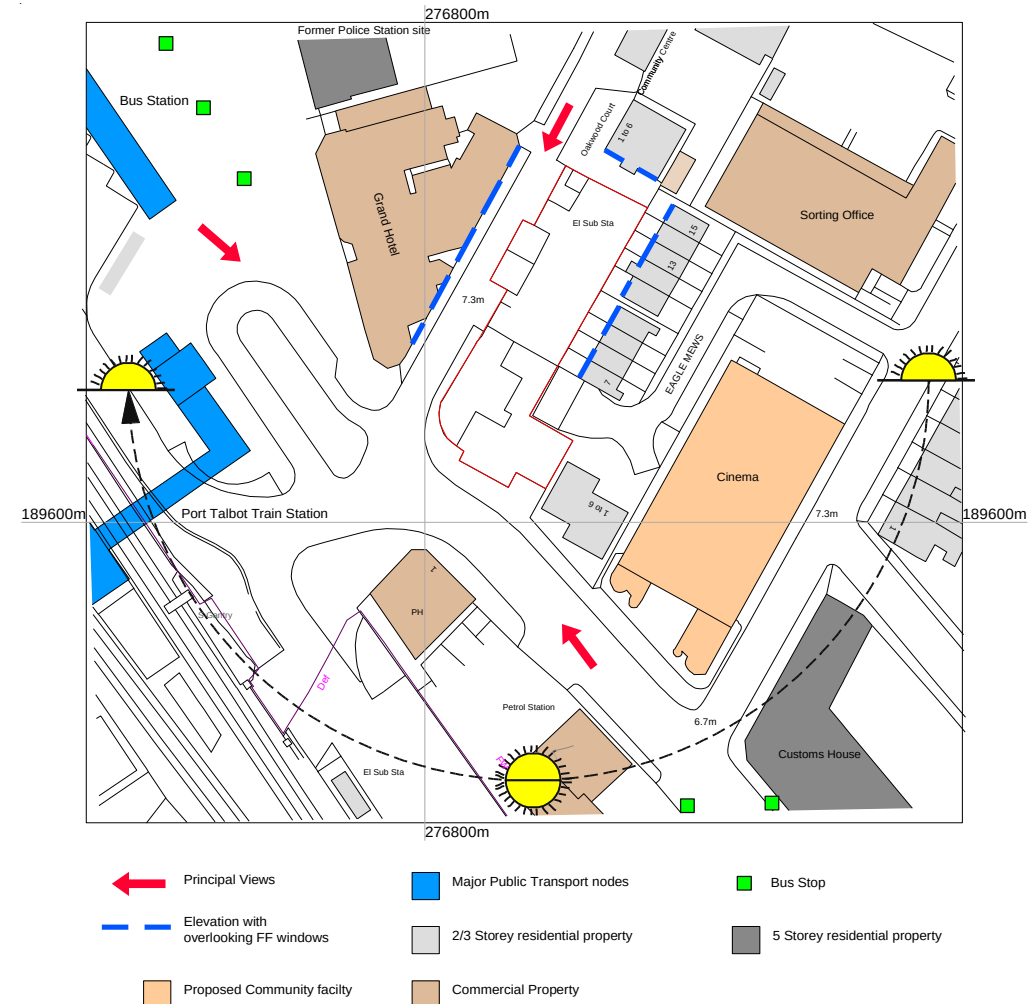
These matters are addressed in the Planning Statement included in Section 4 of this document and also in the Design Analysis section.

The previous planning History is detailed in the Introduction & Vision section.

Surrounding land & Buildings Use

The surrounding area is a mix of commercial, leisure, residential and retail. The use and character has been changed somewhat in recent years by the diversion of the A48 and the construction of the transport hub, combining the train and bus stations, and the large pedestrian areas in front of the George Hotel to the North of the site.

The following extract from the site analysis plan shows the use types of the buildings in the immediate vicinity.



The eclectic mix of land and building uses means that no one use type is predominant in the area, although a number of recent developments have given the area more of a city type residential character.

In 2015/16 a former late Victorian/Edwardian terrace of offices and retail units on Talbot Road/Eagle Road to the SE of the site was replaced with a modern 5 storey apartment block over retail units, Custom House.



Also, in July 2019, Planning Consent (P2019/5079) was granted for the demolition of the former Police Station on the corner of Talbot Road (pre diversion) and Grove Place and the construction of affordable housing apartments over commercial units. This building has now been completed and is referred to in the pre application advice as an example of good design in the area.



These more recent residential developments will have affected the demographics of the area, increasing the number of residential units and hence residents. This potentially leads to more footfall for local businesses in the area, which may be a positive for the proposed Ground Floor Commercial Units in the application scheme.



Next door but one to the site (to the SE) is the Grade II Listed former Plaza Cinema. CADW describe the building as:

"a very rare example in Wales of a building type which expresses the distinctive architectural vocabulary of 1930's cinema architecture, and whose interior has escaped subdivision or major changes."

In 2019 Planning Consent was granted for a scheme to retain and refurbish the Cinema to provide a mixed-use community facility including a café, offices, hall, multi-purpose rooms, gymnasium and ancillary facilities, along with 2no retail units on the Ground Floor facing Talbot Street.



Immediately adjacent to the site to the South is Eagle Mews. The photograph below shows a view of the street from the North with the site in the foreground with Eagle Mews, the Plaza Cinema and Custom House apartments in context.



View of the site looking South down Talbot Road.

To the North of the site, on the opposite side of Oakwood Lane is the Grand Hotel (see opposite). This now fronts onto the new pedestrian area and bus/train station formed by the diversion of Talbot Road. Past the Grand Hotel the building types become more commercial/retail in character as the pedestrian area leads to Station Road which is within the main designated town centre area and leads to the major retail units to the North.



Immediately behind the site to the North East is a further 3 storey block of apartments, a vehicle repair garage and a cultural centre on Oakwood Lane with a residential care home and the rear of 2 storey houses beyond.

Opposite the site on the Western side of Talbot Road is a bar/restaurant and a Petrol Filling Station with a convenience store and food outlet (Subway).



To summarise the surrounding building uses are a mix of residential and commercial/retail typical of a town centre location. The presence of a major public transport hub adjacent to the site presents a perfect opportunity to continue the recent increase in residential accommodation in the area whilst retaining the existing commercial use on Ground Floor.

None of the surrounding building or land uses place any particular or significant limitations on the development of the site and all are entirely compatible with the use of the site for mixed residential/commercial purposes.

There are minor issues such as potential traffic and train noise to be considered (see later) but these can be overcome with design features within the proposed building.

Neighbourhood Structure

There is a well-established neighbourhood Structure in the area of the site, albeit it has undergone an element of change in recent years.

The construction of Harbour way and the alterations of Talbot Road to accommodate the Bus Station have reduced the traffic flow along Talbot Road giving a more pedestrian feel to the area.

The creation of the public transport hub and the associated pedestrian area has enhanced this structure ensuring that the area has easy and important public transport links to the local area and the wider region. The presence of a main line railway station also provides easy access to the Cities of Cardiff and Swansea (and beyond) increasing the availability of employment to potential residents of the area.

The site offers easy pedestrian access to a range of local amenities for both potential residents and users of the Ground Floor commercial units. There are convenience stores close to the site opposite and to the South on Talbot Road (Spar, Lifestyle Express), as well as easy level pedestrian access to the Town Centre and its retail offering to the North.

There are also Schools and other Community facilities within easy travel distance of the site/area (See Access Statement). The forthcoming development of the Plaza Cinema will significantly add to this mix, further reinforcing the site as an ideal location for additional residential accommodation.

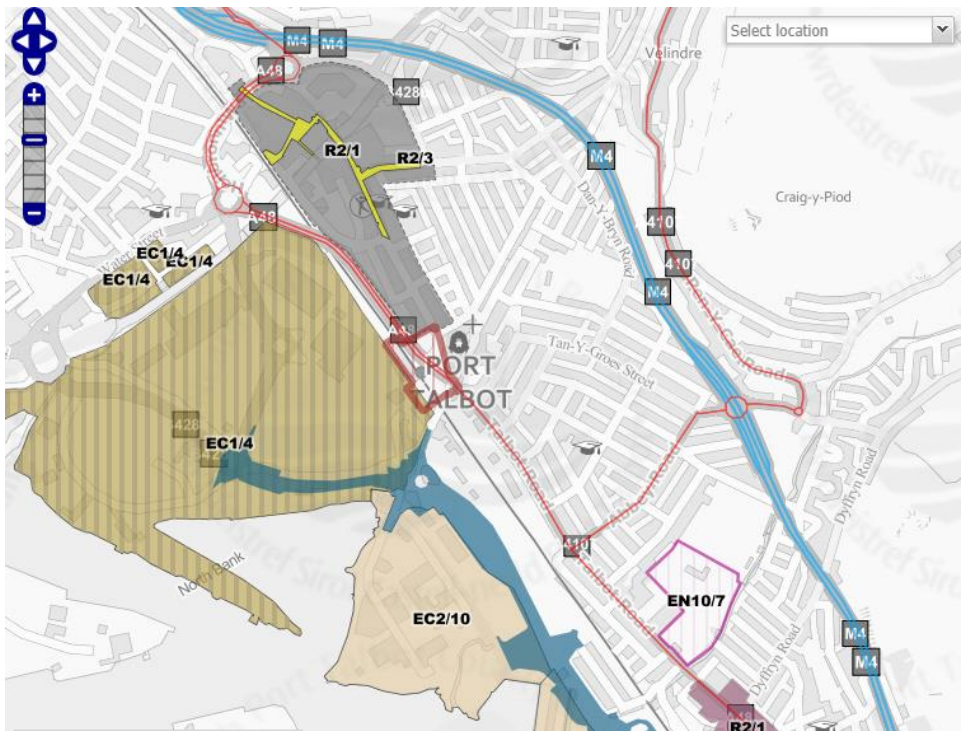
Whilst there are a number of new residential developments close to the site there is also a long established residential community surrounding the site to the North and East. The location therefore presents an opportunity to provide additional affordable accommodation within or close to an existing strong community potentially enabling young people from the area to stay in the vicinity. There are limited additional opportunities in the immediate vicinity for additional residential accommodation.

Whilst there is a large housing allocation to the West of the site, this is the other side of the railway lines and is not intrinsically linked to the existing community and may be some years away from potential development.

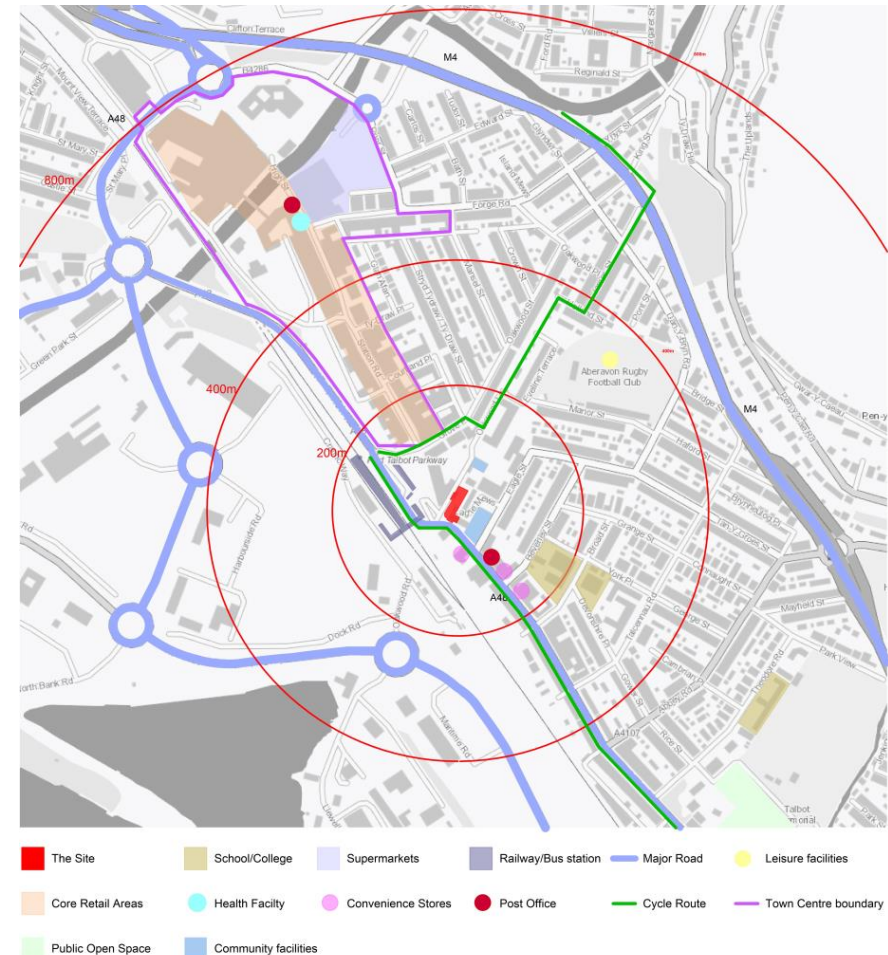
As the site is within an existing residential area, with good access to facilities it is not considered that the proposed development will have any negative effect on the surrounding neighbourhood and can only enhance the area.

Residential use of the site is therefore entirely compatible with the existing neighbourhood structure which is a highly sustainable location with good access to facilities and potential employment opportunities in the local and wider areas.

The area to the West of the site on the opposite side of the railway lines is identified within the LDP as a Strategic Employment Site (EC1/4) and it is hoped that the ongoing development of this area will increase the availability of Employment within the Town as a whole. The proposed development is ideally located to provide affordable housing accommodation in close proximity to the potential employment area.



An overview of local facilities and amenities, along with transport connections are shown on the extract from the Site Analysis drawing (1487:PL:02) below:



Consultation & Engagement

This document has initially been prepared to support Pre Application Consultation amongst local residents/community and Statutory Consultees.

The final application will include a detailed report on that consultation and how the design has responded to any comments received.

Initial consultation has taken place with the Local Planning Authority (see page 6) and the currently proposed scheme has responded to the issues raised in the advice received as set out in the Design Appraisal and Planning Policy sections to follow.

Socio Economic and Market Analysis

The site is ideally located within close to existing residential communities and close to a wide range of facilities.

The site has been identified by the Housing Association as being an ideal location to provide high quality affordable housing within the area. There is an identified need for such housing, particularly in areas with such good links and access to employment opportunities.

It is understood that the site has been identified by the Local Authority as a suitable Housing site, is supported by the Housing Officer and that it will be included on the PDP list in the near future.

Whilst the requirement for commercial space is less clear the proposed scheme does offer an opportunity to provide a series of small scale commercial units that seem to be in reasonable demand at the moment.

Given the local demographics it is felt that affordable housing is an appropriate development for the site. It is not anticipated that the proposal would have any adverse effect on the local community. Indeed, the provision of additional housing on such a sustainable site would bring significant benefits.

The potential site value has been assessed along with the anticipated value of completed units and it has been established that a minimum of 20 housing units in addition to the commercial units are required to make the site viable.

Whilst private housing has been considered it is not anticipated that the potential values or demand would justify such a development.

Tai Tarian have identified that the prime demand in the area is for one-bedroom apartments. However, to ensure a more diverse community within the proposed development, it is felt that the inclusion of a number of two-bedroom apartments is desirable.

The proposed design has aimed to respond to this identified mix of apartment types.

Landscape

Topography

The area in general is reasonably flat with no hills or steep areas within the immediate vicinity. Levels on Talbot Road and Oakwood Lane are generally commensurate with the site and present no issues accessing the site.

The site is predominantly taken up with existing buildings and a car park to the rear and as such is generally flat in all directions with a slight rise of approx. 400mm to the rear (North) of the site

A full topographical survey drawing (P3403-Sheet 1) has been included in the application along with a site features and demolition plan (1487: PL1:03).

Other than the implications of the Flood Consequence assessment (see Blue & Green Infrastructure below) the site levels present no opportunities or constraints on the design.

Access Points

The site is currently accessible by pedestrians from the Talbot Road frontage and by vehicles from Oakwood Lane.

There are gates to the car park to the South and North of the separate building that sits on Oakwood Lane, that is a former Public Convenience (see below).

Boundaries

The site boundaries are shown on the submitted existing site plan (1487: PL1:03) and can be summarised as:

To the South (fronting Talbot Road) the existing building frontage forms the boundary of the site and sits directly at the rear of the public pavement.

As the pavement turns into Oakwood Lane the existing building is set back with the site boundary formed by a metal fence with stone piers on Oakwood Lane itself.



The Western (Oakwood Lane) boundary is a combination of this metal fence, with gates separating the site from the footpath along with the external wall of the former Public Convenience which interrupts the footpath approx. halfway along the boundary.

To the northern end of this boundary is an electric sub station which is surrounded by a metal palisade fence on 3 sides, with the eastern boundary to the existing car park formed by a stone wall.

The northern and eastern boundaries of the site are formed by a low level concrete wall with a close boarded timber fence above which separates the site from the existing 2 storey houses on Eagle Mews to the East and the 3 storey apartments to the North.

There are overlooking windows at First and Second Floor looking over these 2 boundaries which any proposed design will need to respect (see Site analysis plan 1487:PL:02).

There are also overlooking windows on the Grand Hotel which is on the opposite (West) side of Oakwood Lane, although these are less of an issue as it is not residential accommodation.

Generally, the boundaries and immediate neighbours are not a significant restraint on the proposed design other than the need to respect the overlooking windows.

Existing Building

The site has 2 building on it at present, both of which are proposed for demolition to accommodate the proposed redevelopment.

The primary building is Eagle House itself, which is a 2 storey stone building with a rendered ground floor plinth. See photos above.

The building has a pitched roof and various stone features such as window surrounds and quoins.

The building itself is identified as “A building of Local Importance within the Supplementary Planning Guidance (SPG): The Historic Environment (April 2019) which supports policy BE2: Buildings of Local Importance in the Local Development Plan.

The LDP sets out clear guidance on what evidence is required to support proposals to demolish such buildings.

This has been identified in the pre application advice received from the Planning Department. The advice states that while the principle of development, and by implication the demolition of the building, is supported on the assumption that the above requirements are met.

Policy BE 2

Buildings of Local Importance

Development proposals that would affect buildings that are of local historic, architectural or cultural importance will only be permitted where:

1. They conserve and where appropriate enhance the building and its setting; or
2. It is demonstrated that the development could not reasonably be accommodated without affecting or replacing the building and the reasons for the development outweigh the heritage importance of the site.

The Design Analysis and Planning sections below set out the response to these requirements.

The need to meet these requirements is a potential weakness of the site in development terms as listed at the end of this section. However, it is felt that the benefits of providing much needed affordable housing in a sustainable location with a clearly identified need outweighs the potential harm of demolition.

The second building on the site is a former Public Convenience that has since been converted to additional commercial/office space. This building straddles the natural line of the pavement running along Oakwood Lane and it has been suggested in the pre application advice that it would be beneficial if the pavement could be restored to provide a better pedestrian link to the properties beyond the application site.

Blue & Green Infrastructure

As the site consists entirely of existing buildings and associated car park there are no Green Infrastructure or ecology on the site itself that would need to be considered in any design.

However, it is recognised that Planning Policy and SUDS drainage schemes should seek to improve existing biodiversity on development sites. This matter is addressed in the Design Evaluation that follows.

The wider area around the site has little in the way of Green infrastructure that would need to be considered in any design development. The area is distinctly urban in nature.

There is also no significant Blue Infrastructure on site or in the immediate surroundings. The River Afon is approx. 600m to the North of the site where it runs through the northern end of the Town Centre. However, this has no real link to, or influence on the development site other than the issues identified below.

The Docks are approx. 350m to the SW of the site. However, as the area is private and not generally accessible to the public this has little design impact on the proposed site.

Flooding:

The site lies at the edge of a C1 Flood Zone which is shown in green on the extract from the NRW online Development Advice Map below. As such a detailed Flood Consequence Analysis has been carried out to inform the design process and establish the potential risks to any development.

This document (90617-CastellGrp-EagleHs_v1_020621), prepared by Unda Consulting, has been included as part of this application.

The FCA has identified the potential flooding levels on site in the critical events set out in TAN15. The design of the proposed development takes due regard of these levels and the general recommendations of the FCA as set out in the Design Analysis section of this document.

Whilst the risk of flooding is a potential threat to the project it is believed that the threat can be mitigated with an appropriate design response.



Ecology

The site is of limited ecological value and as such an overall ecological survey has not been carried out.

The site is effectively 'landlocked' by existing roads and pavements and is not connected to any wider green or blue infrastructure.

However, as set out in the pre application advice, the existing building may have potential for roosting bats. As such a Bat Survey (P1876 Eagle House, Port Talbot 13-5-2021) has been carried out which has confirmed that there are no bats present in the building. However, the Report recommended further emergence survey are carried out prior to any demolition taking place.

This additional emergence survey has been carried out and a Report (P1876 Eagle House, Port Talbot-03-08-2021) is included in this application which confirms that there was no evidence of nesting bats or birds on the site.

The pre application planning advice has indicated that any application is supported with a Biodiversity Enhancement Scheme. Given the low level of biodiversity on the existing site it will be relatively simple to improve biodiversity. This is addressed in the Design Analysis (Biodiversity) section of this document.

There are no particular weaknesses or threats to the proposals from existing ecological features. However, there is an opportunity to enhance the biodiversity of the site.

Ground Conditions/Constraints

The Pre Application Advice received identified the possibility of historic ground contamination on the site and suggested that any application would need to be supported by a Phase 1 Desktop Ground assessment.

This has been prepared and the report (ref: 21035R1 - Phase 1 Desktop) has been included with this application (PAC).

The Report has identified the potential for historical contamination of the site but has generally classified the risk to future occupants as Low to very Low and the risk to construction workers as moderate.

The Report recommends that further investigations are required including chemical testing of existing soils at an appropriate time. As the site is currently entirely covered by buildings and a tarmac car park, it is anticipated that this testing will be subject to an appropriate Condition to any potential Planning Consent.

The Desk top study confirms that the site is not at risk of mineworkings, which is also confirmed in the pre application advice received.

Given the results of the desktop study and the height of the proposed building it is anticipated that a piled foundation solution will be required. This can only be confirmed once a full site investigation is carried out. If a piled solution required it is understood that a Piling Method Statement will be needed to support a Full Planning Application.

The potential for contamination is a threat to the development but given the contents of the desk top study it is anticipated that any risks can be mitigated by design.

Microclimate

General assessment

There are no significant on, or off site, features that would have a significant detrimental effect on the site and any proposed development. The area is currently residential/commercial and no issues have been identified by current occupants.

The main orientation of the site is North/South allowing dwellings to be positioned with an East/West facing aspect to maximise daylight and minimise solar gain/overheating.

There are no significant tall buildings in the vicinity of the site that could create wind tunnels or overly shade the site. The primary southern, eastern and western aspects of the site are not overshadowed to any great extent.

Acoustic Environment

The proximity of both Talbot Road (A48) and the Bus Station and Main line train station in close proximity to the site give the potential for noise to be an issue. This was identified in the Pre Application advice, which recommended a Noise Assessment was carried out prior to any full application.

A Noise Assessment (8972, Eagle House, Port Talbot - 1st Issue) has been carried out by Acoustic Consultants Ltd and is included in the application.

The Predicted Noise survey identified that the southern, eastern and western boundaries of the site were subject to potentially excessive noise levels from the nearby A48 and were classified as Noise Exposure category (NEC) C (southern) and NEC B (eastern & western) as defined by TAN11 as shown on the extract from the Noise Assessment opposite.

Red indicates NEC A, yellow NEC B and Green NEC A.



Whilst the noise source would generate internal noise levels above what is acceptable the report sets out simple fabric and ventilation design criteria to mitigate any excessive levels.

These measures, which include proposed construction methods, sound reduction performance for windows and a requirement for attenuated mechanical ventilation to the red and green facades have been taken into consideration in the developed design.

There is the potential for noise from the A48 which is a potential weakness or threat to the development. However, this can be mitigated by careful design.

Air Quality

Given the proximity of the site to significant roads, air quality could be an issue that needs to be considered during the design process. This may mean locating the mechanical ventilation inputs away from the façade facing the A48.

The pre Application advice has identified that the site lies within the Port Talbot Air Quality Management Area (AQMA). Given this designation a Demolition and Construction Environmental Management Plan (CEMP) has been identified as a requirement of any full planning application.

This submission includes an appropriate CEMP, which clearly sets out the precautions and site management procedures required during construction to minimise the impact on air quality for adjacent residents.

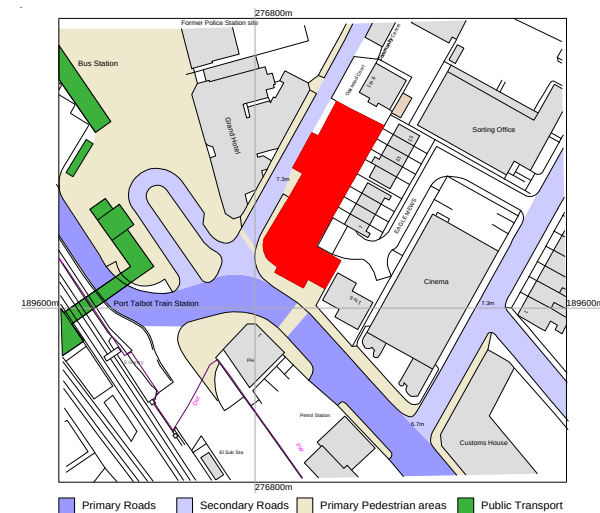
Movement & Infrastructure

Road Hierarchy & Access

The site is in a sustainable location and is located close to many local amenities and facilities as well being well connected to the public transport network.

The site is located on Talbot Road (A48), which one of the main arterial roads serving Port Talbot. The A48 connects directly to the M4 in close proximity to the site.

Recent alterations to Talbot Road and the construction of the new Public Transport hub have slowed traffic and created a more pedestrian friendly environment immediately outside the site.



The new transport hub is within 30m of the site giving easy pedestrian access to many bus and train services providing connections to the local, regional and national networks.

The existing vehicular access to the site is via a secondary road which reduces required visibility splays and the potential for the proposed development to have an adverse impact on the existing primary road.

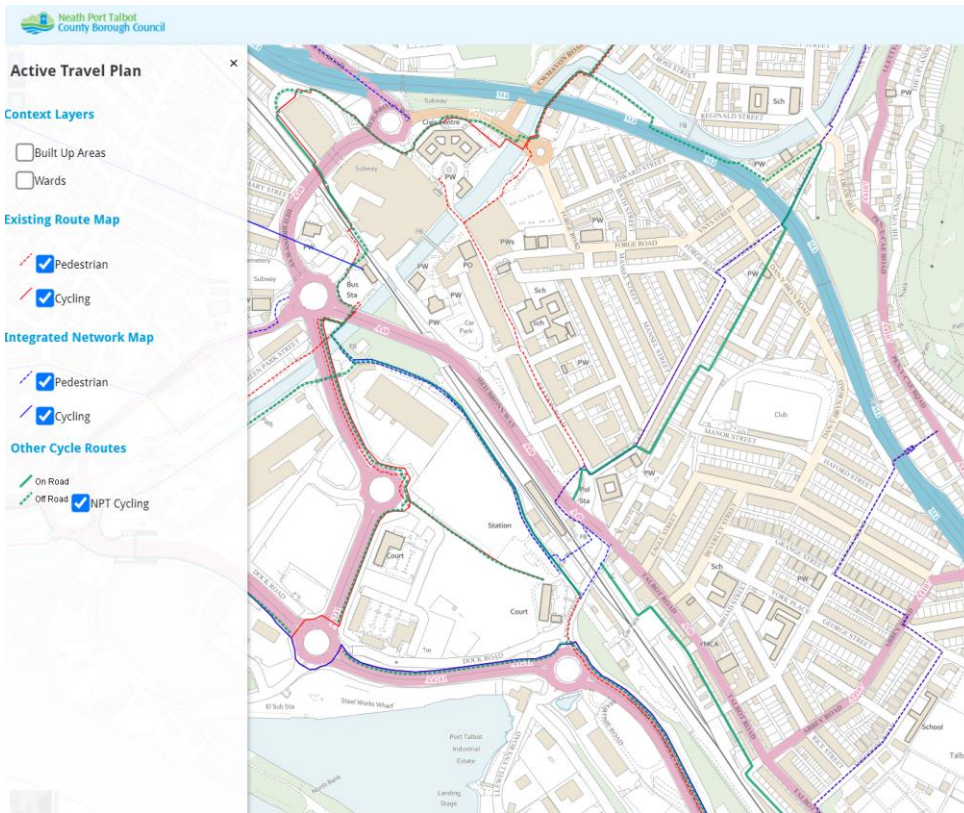
This access is likely to be retained in any proposed development to enable the prime frontage for commercial units onto Talbot Road to be fully utilised.

There is a wide pedestrian footpath running along Talbot Road across the front of the site which connects, via a clearly identified crossing over Oakwood Lane, directly to the transport hub and the town centre beyond.

There are identified active travel routes in the vicinity and Oakwood lane is identified as a cycle route on the Neath Port Talbot Active Travel Plan and cycle routes map. See image and links below:

https://www.npt.gov.uk/media/5401/neath_port_talbot_cycle_map.pdf?v=20180717181057

https://maps.npt.gov.uk/active_travel_single_final/



The pavement running alongside the site on Oakwood Lane is currently blocked in part by the former public conveniences. The redevelopment of the site offers the opportunity to reinstall the pavement improving pedestrian links.

Given that the proposed development will be entirely constrained within the boundaries of the existing buildings and car parks, there is no material impact on the existing road hierarchy or routes.

Public Transport

The site is located immediately adjacent to the recently constructed public transport hub which consists of the redeveloped main line train station (Port Talbot Parkway) and an integrated bus station served by a large pedestrian plaza. In addition, there are further bus stops along Talbot Road, all of which are accessible via generous and safe pedestrian footpaths.

The Access Statement includes details of all Public Transport connections including location of the nearest bus stops and timetables for the services that run from them.

Utilities & Infrastructure

Given the location on a main road within the Town Centre it is anticipated that there will be suitable service connections to accommodate the proposed development.

There is an electricity sub station located on the site which indicates that electrical supplies will be available.

The Dwr Cymru/Welsh Water drawings included in the application show that water and drainage connections are available immediately adjacent to the site.

Telecomms connections are available in the adjacent footpaths ensuring that suitable digital connectivity can be provided to the site. BT superfast broadband is readily available.

A Sustainable Drainage scheme has been developed and this is included in the application.

It can be seen that there is suitable drainage, water, telecoms and electric services within close proximity to the site and the capacity exists to serve the proposed development.

Built Form

Urban Form

Given the Town Centre location of the site the surrounding Urban Form is clearly apparent with an established pattern of roads, pavements and circulation routes.

The position of the site on the corner of a primary and secondary road defines the orientation of the site and the probable orientation of any proposed development.

A development that addresses Talbot Street and reinforces the corner to oakwood lane would be an appropriate response to the urban form of the area.

The Eastern side of Talbot Street is characterised by buildings that form a hard edge with the back of pavement with little or no defensible or private space. A continuation of this theme would be an appropriate response which would maintain the established building line.

Although the existing building does not extend to the curved boundary as the site turns into Oakwood Lane, there is strong site edge formed by an existing stone wall with railings. To extend any development onto this curve would be an appropriate design response to the site and the established urban form, where there are little or no forecourts and buildings generally extend to the site extents. This would be in line with the design of Custom House and the new Police Station site development.

There has been some recent change to the urban form in the area with the addition of the public transport hub and the pedestrian plaza in front of the Grand Hotel and the former Police Station site.

Given that it pre-existed the plaza the existing building does not really address this new and important public space. The redevelopment offers an opportunity to correct this and provide a strong corner that addresses the newly created public domain.

Building Scale, heights and Density

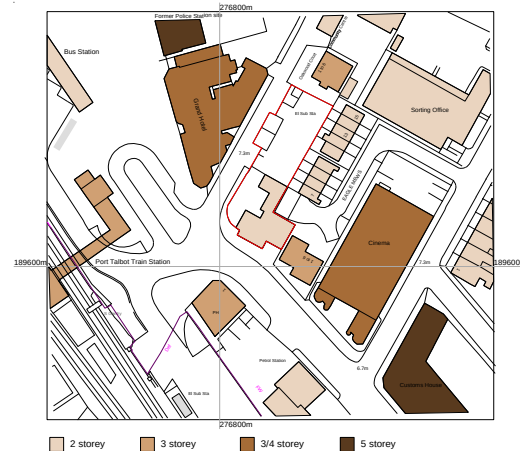
The majority of the adjacent dwellings within the area are 3-4 storeys in height with high roof lines, giving a verticality and density to the streetscape.

The Plaza cinema is a tall building which is a dominant feature in the area.

The Grand Hotel and the new Housing development to the north are also relatively tall buildings on the street or pavement edge, reinforcing the density of the area.

The nearby Train Station also has a distinct vertical element again giving a sense of scale and density to the area.

The existing building is an anomaly to the general trend and does not follow the general pattern, or density of the surrounding area. There is an opportunity 'fill the gap' created by the existing building and the fact that it does not entirely fill its site.



Strengths, Weaknesses, Opportunities and Threats

Strengths

- The site is available and deliverable,
- The site is in a residential/commercial location in an area with an identified need for affordable housing,
- The location is highly sustainable in transport terms and located close to a Town Centre, a Public Transport hub and a range of local amenities,
- The site is not overshadowed and allows windows to be located on most elevations,
- There are sufficient statutory service connections readily available in close proximity to the site.

Weaknesses

- The adjacent A48 generates noise levels that need to be addressed in the design,
- Limited reduction in parking numbers available for sustainable location due to the restrictions in the Parking SPG.

Opportunities

The site provides an opportunity to

- address an identified need for affordable housing,
- provide high quality accommodation in a sustainable location with easy access to the wider region and employment opportunities.
- Provide a development that is Zero Carbon in operation due to the RSL's commitment to sustainable technologies,
- ensure that safe access for all is provided to the proposed building(s).
- provide a development that is sustainable in its construction and ongoing use.
- provide a development that is sensitive to its wider environment and does not adversely affect neighbouring occupiers.
- To strengthen the corner and reinforce the existing urban form in the area.
- To provide a signature building on an important junction adjacent to the new public transport hub, which addresses the newly created public Plaza.

Threats

- The site has a potential risk of future flooding according to the Development Advice map. Whilst it is believed this risk can be mitigated and designed out of the scheme a positive result is dependent on NRW's support.

Design Brief:

The brief agreed between the Developer and Family Housing Association is to:

- Provide high quality accommodation fully compliant with Welsh Design Quality Requirements (DQRs) and Lifetime Homes.
- Provide apartments that are net Zero Carbon in use.
- Provide a development that achieves the client's operational and economic brief.
- Ensure that safe access for all is provided to the proposed building.
- Provide a development that is sustainable in its construction and ongoing use.
- Provide a development that is sensitive to its wider environment and does not adversely affect neighbouring occupiers.
- Provide a development that makes a significant architectural contribution to the area to mitigate the loss of an identified building of Local Importance.

3.0 Design Analysis

The final design for the Proposal, shown on the submitted plans, has been developed following the detailed appraisal of the site set out above. The evolution of the design, and a description of how it relates to the character and context of its surroundings, is set out below.

The five objectives of good design are a set of principle considerations, as outlined in Technical Advice Note 12, to ensure developments effectively respond to local context so that they assimilate into the locality and are functional for their intended user. The Five Objectives of Good Design are Access, Movement, Character, Environmental Sustainability and Community Safety – each of which will be dealt with separately in turn below. The Welsh Governments 'Design and Access Statements in Wales' (June 2017) has been carefully considered in this section.

Design Development/Evaluation

The design of the buildings and the site layout have been arrived at following careful consideration of the Client's housing and management brief, the constraints and opportunities offered by the site analysis and the results of the consultations undertaken.

The design of the individual dwellings and the overall site layout also complies with Secured by Design, the Welsh Design Quality Requirements (DQR's) and Lifetime Homes.

The relationship between the dwellings and the external areas together with the need to ensure that wherever possible a level access is provided has determined the overall site layout.

The following design principles have been established to inform and guide the design process:

- Respond to the context and Character of the site,
- Provide internal and external layouts that are fully DQR compliant to ensure the proposed dwellings are suitable for affordable housing,
- To provide modern, efficient, well insulated accommodation,
- To provide a quality design that enhances the character of the area,
- To provide a site layout that is safe, secure and improves the environment for all,
- Provide accommodation that meets the requirements of Building Regulations Part E, internal passage of Sound, to ensure the amenities of future residents,

- To provide a balance of unit types to ensure a diverse mix of occupants and creation of a sense of community within the development,
- To minimise the amount of maintenance required by the HA.

The following sections give more detail on how the proposed design has developed and meet the 5 Objectives of Good Design referred to in TAN 12: Design.

Access

Refer to section 5: Access Statement of this document and the site and building layout sections below.

Movement

Refer to section 5: Access Statement of this document for details of movement to and from the site/building.

Character

Use

The proposal is to provide 100% affordable housing, owned and operated by an RSL, on an existing previously developed site in Port Talbot. The proposal also included Ground Floor Commercial Units to mitigate for the loss of the existing units that will be demolished. The proposed design has sought to maximise the potential of the site without overdeveloping it and is set out on the submitted drawings.

The site is in a mixed residential/commercial/retail area and pre application advice received has indicated that the proposed use is acceptable in principle subject to successful resolution of a number of matters raised. These are generally addressed in this and the following Planning Policy section.

The proposed site plan is shown below and is included in the application as drawing 1487:PL1:04.

Amount

The scheme provides for 20 apartments with a mix of two types:

- 16 number 1 bedroom, 2 person apartments (B, C, D, F, G, H),
- 4 number 2 bedroom, 3 person apartments (A, E),

Along with 4 Commercial/Office/Retail Units which range between 37m² and 65m².

The overall area of the site is 995m² (0.1Ha). This gives an overall site density of, 200 units per hectare (81 per acre). This is in excess of the minimum requirement of 35 dwellings per hectare for the Coastal Corridor Strategy Area set out in Policy BE1 (see

below). This is a reasonable density for an apartment development and is in line with the recent affordable housing developments in the area such as the former Police Station site.

The inherently sustainable nature of the site in terms of access to public transport, local facilities and potential employment would encourage a higher density of development to take best advantage of the opportunities presented.

The areas of the individual dwellings are shown in the following table:

The apartment sizes are in line with established norms and are in full compliance with Welsh Design Quality Requirements (DQRs) and Lifetime Homes, in terms of overall size and internal layouts.

The development is proposed to be 100% affordable with all of the proposed residential units to be secured as affordable in perpetuity. The RSL's Housing department have carefully considered the housing mix to satisfy the demand in their housing register, and also looking at possible future needs.

In terms of amount, the number of dwellings proposed across the site is largely compatible with the surrounding area and the scheme sits comfortably within its residential context. Consequently, it would not have a negative impact on the existing built form.

The Commercial Units on the Ground floor have been laid out to provide either 4 individual small units, a single larger unit or a combination. This is to appeal to the widest possible market, particularly given current circumstances.

Although there is concern over the viability of constructing new office space at the present time, it is hoped that the proximity to the transport hub and the Town Centre will increase the attractiveness of these proposed units.

Apartment Number	Apartment Type	Bedrooms/Person	GIA
1	A	2 bed/3 person	60.0m ²
2	B	1 bed/2 person	52.0m ²
3	C	1 bed/2 person	48.0m ²
4	D	1 bed/2 person	52.0m ²
5	E	2 bed/3 person	64.0m ²
6	F	1 bed/2 person	50.0m ²
7	A	2 bed/3 person	60.0m ²
8	B	1 bed/2 person	52.0m ²
9	C	1 bed/2 person	48.0m ²
10	D	1 bed/2 person	52.0m ²
11	E	2 bed/3 person	64.0m ²
12	F	1 bed/2 person	50.0m ²
13	A	2 bed/3 person	60.0m ²
14	B	1 bed/2 person	52.0m ²
15	C	1 bed/2 person	48.0m ²
16	D	1 bed/2 person	52.0m ²
17	E	2 bed/3 person	64.0m ²
18	F	1 bed/2 person	50.0m ²
19	G	1 bed/2 person	48.0m ²
20	H	1 bed/2 person	52.0m ²
Commercial Units			
1			39.48m ²
2			37.6m ²
3			37.6m ²
4			65.25m ²

The total Gross External Area (Gea) of the building is 1,810m² and the total Gross Internal Area (GIA) is 1,647m².

Site Layout

The shape and configuration of the site along with the detailed site analysis has informed site layout along with the requirement to overcome the potential flooding issues in the 1 in 100 year event (see Flooding section and submitted FCA).

- The main drivers on the site layout are:
- The orientation of the building to ensure that no apartments are single aspect North facing,
- Avoid overshadowing to adjacent properties,
- To reinforce the 'corner' and provide a strong visual link to the transport hub and pedestrian plaza,
- To ensure that displacement of water in a flood event is limited to avoid detriment to adjacent properties,
- The need to ensure no overlooking to or from adjacent properties,
- The need to maximise the street frontage for the proposed commercial Units,
- The need to accommodate maximum PV solar panels in the correct orientation to enable net zero carbon to be achieved,
- The need to meet the parking requirements set out in the SPG and refined in the Access Statement,
- The need to ensure a suitable SUDS drainage scheme can be designed,
- To ensure biodiversity of the site can be improved from the current situation.

To ensure that the maximum street frontage for the retail units is provided and to create a strong visual corner the building has been located primarily on the Talbot Road frontage up to the back of pavement, this maximises the area available for the building and associated car parking.

Aligning the building in this way also limits the amount of façade that is north facing ensuring that no apartments are single aspect north facing. In addition, this location minimises the possibility of the building causing overshadowing on adjacent properties.

The extent of the building footprint is dictated by the need to provide the appropriate number of parking spaces, located to the rear of the building.

The requirement to ensure that the commercial units are dry in the 1 in 100 year (+CC) event also dictates the most suitable location for the entrance to these units, at the highest possible point on the footpath.

The points above have all been addressed in the proposed site layout which is shown on drawing 1487:PL1:04 and the extract below:

The site is accessed by vehicles from Oakwood Lane via an existing crossover that serves the current car park.

This gives access to the car park where there are 19 car parking spaces, including 2 disabled spaces below an undercroft where the upper floors overhang the GF.

The number of spaces has been calculated using the information in the sustainability/parking section of the Access Statement.

The spaces have been allocated as shown on the site plan with 6 spaces for the apartments, 4 spaces for visitors and 9 for the Commercial Units.

It is intended that the internal site road will provide a 'shared' vehicular and pedestrian space, in line with 'Manual for Streets'.



As the existing ancillary building (former public conveniences) are being demolished the opportunity has been taken to provide a new footpath with appropriate tactile paving along the edge of the site as requested by the Highways Officer.

The proposed car park is separated from the pavement by a new low stone wall constructed using material reclaimed from the demolition of the existing main building.

To the northern end of the car park is a rain garden or bioretention area to enhance the biodiversity of the site and assist in the SUDS drainage strategy. This area, which is approx. 58m², will potentially accept rainwater from the roof and allow it to be naturally filtered and treated before being discharged into the permeable ground as set out in the SUDS drainage strategy.

The area will also be set down lower than the parking area to act as a potential swale, or sump to reduce the potential amount of water displaced from the site in the event of a flood. Lowering this area by 250mm from the car park could accommodate approx.

14.5m³ of displaced water which would allow the overall car park to be raised by an average of 30mm.

This area will also act as a small amenity space for residents if required. The space equates to 2.9m² per apartment, which is more than the generally accepted minimum balcony size for 2 bedroom apartments. However, it is generally felt that given the location of the site in close proximity to public open space, amenity space may not be required.

Under the overhang upper floors are located separate bin stores for the commercial units and the apartments. These are easily accessible from the site entrance and the adopted road and at 12-14m are within the accepted distance for refuse collection from communal bin stores.

There is an easily accessible and secure cycle store located under the undercroft. This can accommodate up to 20 cycles by use of double height vertical cycle stores. Details of the proposed cycle storage is included in the access statement.

The car park boundary treatments will be generally as existing to the NE and SE boundaries, although the existing timber fence above the low concrete wall on the SE boundary will be replaced with new.

The palisade fence boundary to the existing electrical sub-station will remain unaltered.

There is a new gate proposed onto Oakwood Lane which will act as emergency exit from the site by pedestrians in the event of a flood. This bypasses the potentially deeper floodwater in the location of the main entrance (refer to submitted FCA).

The pedestrian access to both the commercial units and the apartments is directly from the existing footpath on Oakwood Lane. As stated earlier this location has been selected to maximise the frontage of the commercial units to Talbot Street and also to make use of the natural gentle rise in the pavement, which rises approx. 400mm, to assist raising the general floor level as required by the FCA.

There is generally level access from the car park to the pedestrian accesses in line with Lifetime Homes requirements.

The building itself forms the site boundary around the corner and along the frontage of Talbot Road, with the existing footpath extending up to the building edge.

An active frontage is provided to Talbot Road and around the corner into Oakwood Lane by the extensive glazed elements to the commercial units.

The site layout has been carefully considered to ensure there are no issues of overlooking either to, or from, the site and the proposals will have no adverse impact on neighbouring properties.

The Local Crime Prevention Officer is being consulted and an application for Secured by Design certification will be made as required by Wales DQRs. The results of the consultation will be included in the full planning application.

Apartment Layouts

Detailed layouts are shown below and on the submitted floor plans 1487:PL1:04.

All apartments have been designed in strict accordance with Wales Design Quality Requirements (DQRs) and Lifetime Homes (LTH) as required by the HA and WG for Grant Funded affordable accommodation.

The apartments meet the minimum size standards set out in DQRs and in the relevant SPGs.

The Ground Floor houses the Commercial Units as required by Planning Policy. These units will provide an active frontage to Talbot Road and around into Oakwood Lane visually reinforcing the significant corner and addressing the pedestrian plaza linked to the Transport Hub.

The commercial Units have been designed to enable a range of unit sizes to be offered in order to maximise the available market.

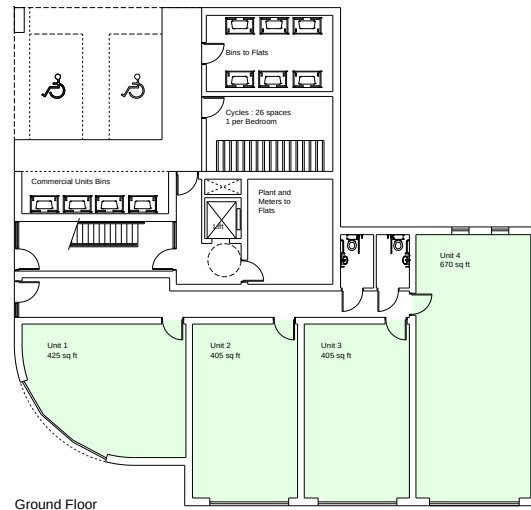
Given the requirement to raise the floor levels to mitigate the risk of flooding the floor level is raised above the pavement level on Talbot Road which reduces the ability to have individual front door to the smaller units. As such they are accesses of Oakwood Lane where the pavement rises to a more suitable level.

The units are accessed off an internal corridor as shown on the plan with communal Wcs (including accessible) included. It is possible for the space to be let as a single unit if the market demands.

As referred to in the site layout section the bin stores and cycle store are located on the Ground Floor and are accessible from the car park. There is also access directly from the apartments to the rear bin store to avoid the need for residents to use the public footpath to access the bin store.

The residential access is also on Oakwood Lane, to enable maximum use of the Talbot Road frontage for the commercial units. The entrance door leads to a communal lobby giving access to the stairs and 8 person lift to the upper 4 floors where the apartments are located.

The layout of the First, Second and Third Floors are shown on drawing 1487:PL1:04 and the extract below.



The staircase and lift are located generally in the centre of the plan to maximise the availability of external walls for the apartments and windows.

Each of the 3 floors has 6 apartments, with two number 2 bed apartments and 4 number 1 bed apartments all accessible from a single fire protected corridor.

The 4th Floor has two number 1 bed apartments as shown on the submitted plan.

Most of the apartments are dual aspect with the two single aspects units facing South to maximise available daylight.

Full height glazing is provided to all lounge kitchen areas, again to maximise available daylight.

All corridors, private and communal are in full accordance with Building Regulations and the fire strategy has been fully assessed to ensure the safety of residents.

Each apartment is fully compliant with DQRs and LfTH and includes suitable storage space.

The internal finishes will be of high quality to provide a suitable environment for future occupants.

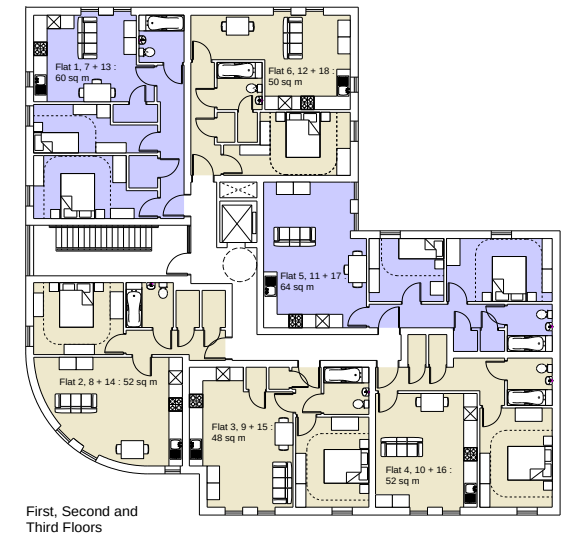
The apartments will be heated by underfloor heating supplied by the communal Ground Source Heat Pump and will have permanent ventilation with heat recovery. Electricity will generally be provided by the roof mounted PV panels with any excess power returns to the grid to compensate for when solar power is not available on site.

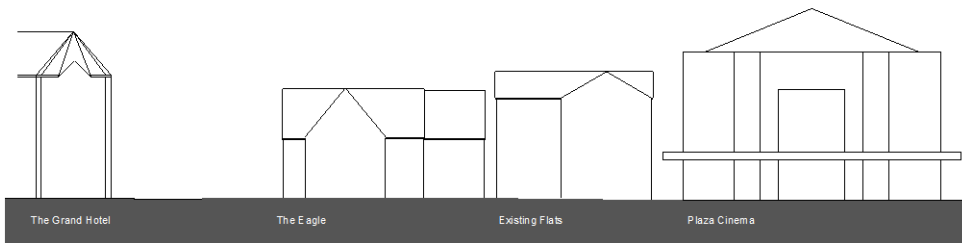
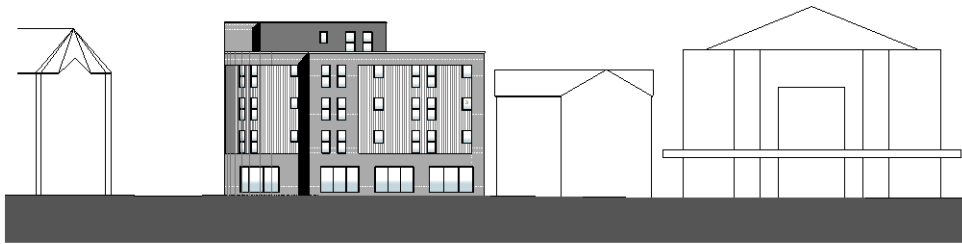
Scale

The scheme represents an efficient use of land and the development, as proposed, is designed to be proportionate to the scale of existing developments in the surrounding area.

The majority of the existing dwellings around the site are 3-4 storeys in height or have steep roofs giving the appearance of additional height.

The current building is of a smaller scale to its neighbours and is generally out of sync with the street scene and does not give a strong feature the corner of Talbot Road and Oakwood Lane which has increased in significance since the development of the Transport Hub.





It is believed that the proposed design addresses these issues and provides an appropriately scaled quality building on this now significant site.

Appearance

The location of the site requires a strong architectural response, a fact highlighted in the pre application advice. Additional conversations with the Planning Officers indicated that the proposed scheme should complement the recently completed development on the former Police Station site.

The proposed design seeks to address these points, and those raised elsewhere in this document by providing a strong visual corner to the pedestrian plaza, with this being reinforced by the curved nature of the façade as the being turns from talbot Street to Oakwood lane.

The building design is contemporary utilising a palette of material to complement other recent developments in the area and a flat roof to accommodate the solar panels required to achieve the net zero carbon aspirations.

The materials selected have been carefully chosen to be sustainable and long lasting with minimum maintenance whilst still providing a visually significant appearance.

The use of bricks is both contemporary and a reference to the history of the area. The buff bricks frame panels of an alternative cladding material with a vertical emphasis that enables the curved façade to be fully realised.

Windows are set within the cladding and bricks with deep reveals and minimal cills to provide punched openings as shown on the submitted elevations and the following extract.





The proposed materials are set out below along with some examples of the products and images of previous use:

Proposed materials

Brick: Cream/buff bricks will be used as the primary wall element framing both the retail unit glazing at ground floor and the windows and cladding elements on the upper floors. The product selected has been used on a number of highly successful developments and is complementary to, and provides a visual link with, the former police station site. The proposed bricks are Ibstock Ivanhoe Cream (see images below).

Cladding: The cladding panels will be vertically to accommodate the curved façade and provide emphasis. A relatively narrow product has been chosen for this reason. The selected product will be a Cedral board or similar smooth faced panels approx. 2-300mm wide and in a complementary colour to the brick surrounds. A standing seam solution is also being considered which will be discussed in detail, with the planners prior any application.

Windows and Glazing: All windows to the apartments will be dark grey UPVC, to further express the deep reveals whilst the ground floor commercial unit glazing will be dark grey powder coated aluminium.

Material examples:



Examples of Ivanhoe brick above and left: dark Cedral board below.



Landscaping/Ecology

Given the urban nature of the site and the density of accommodation required there is limited scope for landscaping/ecology on the site. However, to meet with the requirements of the relevant SPGs and the Biodiversity aspects of SUDS drainage areas have been allocated for biodiversity within the site.

These areas will provide a location for planting of appropriate plant species and may also serve as a location to offset any site raising to reduce any potential impact to the surrounding area during a flood event.

All proposed planting will be hardy and low maintenance and suitable for use in a rain garden environment.

The areas will act as a swale and/or rain garden and will be incorporated into the overall SUDS drainage strategy.

Biodiversity

The need to address biodiversity and geodiversity during the design process as set out in the relevant SPG is recognised. During the design the impact of the proposals has been assessed to ensure that there are no adverse impacts on local biodiversity and that the proposed development will provide a net gain in terms of biodiversity.

As set out in the site analysis section the existing site does not have any landscaping and is entirely covered by buildings and a tarmac car park. There are no areas that have become overgrown and contain any flora or fauna.

However, it is recognised that buildings, particularly older buildings can provide opportunities for bat and/or bird roosting. As such a detailed bat survey has been carried out and the resultant report has been included in the application. This survey found no evidence of bats, or birds on the site.

At this stage it is therefore assumed that the site has no current biodiversity and that the development will not result in any loss of biodiversity.

In order to achieve a net gain in Biodiversity the proposed scheme has included an area of landscaping associated with the Sustainable Drainage solution which will increase the flora on the site and potentially encourage insects and birds to the site.

In addition, the building itself will incorporate bat and bird boxes within its façade to encourage new species to the site. These are indicated on the submitted elevations.

The design process has adopted the step by step approach to assessing biodiversity and the combination of the landscaped area and the bat/bird boxes will provide a net gain in terms of biodiversity in accordance with the relevant planning policies and SPGs.

Community Safety

TAN 12 suggests that community safety can be achieved via design solutions that can aid crime prevention. These include providing natural surveillance, improving safety by reducing conflicts in uses, and promoting a sense of ownership and responsibility.

The proposed scheme has been designed to meet Secured by Design standards and a formal application is being submitted. Consultation has taken place with the local Designing Out Crime Officer (DOCO) and their recommendations have been included in the site and buildings design.

The development has been designed to protect property and ensure the community's and individual's safety by allowing for natural surveillance of all parts of the site. The nature of the proposed development will ensure activity on site throughout the day which is a natural deterrent to crime and anti-social behaviour.

The design ensures that there are no hidden areas that could promote antisocial behaviour and all car parking spaces are located within secure areas that are overlooked by at least 2 properties.

There are no adjacent properties adversely affected by the proposed development.

It is not anticipated that the proposed development will have any negative impact on Community Safety.

Environmental Sustainability

As identified within Technical Advice Note 12, Developers are required to achieve efficient use of and protection of natural resources, to enhance biodiversity and to design for change.

The site is situated in an inherently sustainable location by virtue of its position within Port Talbot and its close proximity to public transport routes and local facilities (as described in the following Access Statement), thus minimising the use of the personal car.

The site will be developed to accord with the latest Building Regulations standards. The overall sustainability principles of the development therefore are considered to be high.

The Proposal has been designed with its impact on the environment a key factor. The sustainability of the buildings in construction and use has been considered.

Tai Tarian, the end user, has set the challenge of designing the apartments to be net Zero carbon in operation. This has been achieved by the implementation of a number of design decisions and use of technology as set out below.

Materials

The proposed materials for the Proposal have been sourced with sustainability in mind. The walls, floors and internal finishes all achieve an A or A+ rating in the Green Guide to Specification (published by BRE).

Wherever possible, recycled aggregates will be used in the construction of the floor slab make up and sub base.

Energy Efficiency

The proposal will seek to contribute to energy efficiency and carbon reduction by being net zero carbon in operation. This will be achieved by:

- The use of an extensive array of Solar PV panels on the upper and lower roofs,
- The use of a large communal Ground Source Heat Pump to provide heating and hot water to the apartments,
- The installation of Mechanical ventilation with Heat Recovery to all apartments,

- Achieving U values in excess of Building Regulations to improve the energy efficiency of the dwellings and they will be constructed to ensure minimum air leakage to further improve efficiency.
- Ensuring that the design and construction achieves air permeability rates below the minimum required for Building Regulation compliance,
- The specification of the glazing includes low e glass to reduce heat loss in winter and solar controlled glass to reduce heat gain in summer,
- The use of energy efficient lighting throughout the development,

Transport

The Access Statement below confirms that the location is well served by public transport and this will have an impact on the sustainability of the development as a whole.

Waste

A dedicated recycling storage space area is provided to each kitchen in accordance with DQR standards.

There is a dedicated external bin store which has been designed to accommodate the size and number of bins required by the residential Design Guide SPG. The bin store is located in an accessible location for both residents and refuse collection operatives with a safe and level access.

Waste Minimisation Strategy

It is key that we ensure finite resources are used responsibly by minimising waste, maximising recycling opportunities and by promoting the use of materials with less environmental impact.

Waste minimisation will be considered in all stages of the development, from demolition through to construction. Some of the measures at all stages have been listed below.

- Use of materials that could be re-cycled in the future including masonry, brick and aluminium,
- Standard components and opening sizes used where possible to minimise off-cuts and wastage.
- High quality robust materials used to minimise need for future replacement and future waste,
- Promote responsibly sourced, low embodied energy and local sourced components where possible to minimize environmental impact and wasted energy use in manufacture and transport,
- Investigate using materials with a higher recycled content, such as aggregates, bricks, blocks, mortar etc.

- On site minimization of site waste and promote recycling on site during construction,
- Promote recycling ethos for building users by providing large, well located, bin store areas with easy access for residents and collection services.

Drainage

A detailed Drainage Strategy and design has been commissioned from Intrado Consulting Engineers and will be submitted as an application to the local SAB in conjunction with the Full Planning application.

A Grond Investigation including infiltration tests has been carried out and the report indicates that the site is permeable and that infiltration can be used as a means of surface water drawing.

Given this information the following drainage strategy will be adopted for surface water drainage.

The car park areas will have a permeable surface to enable water to infiltrate to the carefully installed sub base and the water will be allowed to soak away from the stone layer by natural infiltration and be treated by the process.

The roof drainage will be piped from the roof to ground where it will be transferred to the rain garden/biodiversity area. At this location it will permeate into the ground. The rain garden substrate will be designed to accommodate the appropriate volume of water to enable suitable treatment of rainwater as it permeates into the ground.

4.0 Planning Policy/Consultation

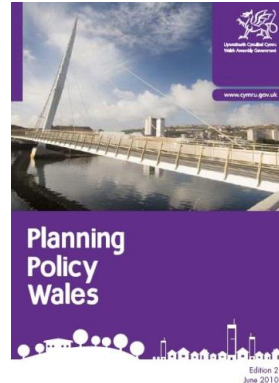
This Section identifies the National and Local Planning Policies that apply to the proposed development and briefly states how the proposals meet these Planning Requirements.

National Planning Policy

National Planning Policy is set out in Planning Policy Wales (Edition 9, November 2016), Ministerial Interim Planning Policy Statements (MIPPS) and 21 Technical Advice Notes (TANs).

The following TANs are believed to apply to the proposal and have been considered during the design process:

- TAN 1: Joint Housing Land
- TAN 5: Nature Conservation and Planning
- TAN 11: Noise,
- TAN 12: Design
- TAN 15: Development and Flood Risk,
- Tan 16: Sport Recreation and Open Space
- TAN 18: Transport,
- TAN22: Planning for Sustainable Buildings.



Planning Policy Wales

Planning Policy Wales – Edition 9 (November 2016) is the principal document, which sets out the land use policy context of the Welsh Government, for the consideration and evaluation of all types of development.

Paragraph 4.1.2 refers to The Well-being of Future Generations (Wales) Act 2015 which places a duty on public bodies (including Welsh Ministers) to carry out sustainable development. In carrying out this duty, actions which public bodies must take include:

- setting and publishing objectives (“well-being objectives”) that are designed to maximise its contribution to achieving each of the well-being goals; and,
- taking all reasonable steps (in exercising its functions) to meet those objectives.

The Act puts in place seven well-being goals to help ensure that public bodies are all working towards the same vision of a sustainable Wales. These include the need for cohesive communities which are attractive, viable, safe and well-connected.

“Sustainable development” in Wales is defined as the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

This chapter recognises the important function of urban areas where priority is to ‘secure environmentally sound and socially inclusive regeneration to those urban areas which require it, so that they become more desirable places to live and work’ (Para 4.6.1).

Subsection 4.9 states the Welsh Government’s preference for the re-use of land. It mentions that brownfield sites in built-up areas will ordinarily be considered suitable for development, as they accord with sustainability objectives.

Chapter 8 deals with Transport and places emphasis on locating development to minimise the need to travel, particularly by private motor vehicle.

Paragraph 8.1.5 lists a series of transport objectives that the Welsh Government wishes to achieve through development planning, of which the most relevant to this application reads as follows:

- reducing the need to travel, especially by private car by locating development where there is good access by public transport, walking and cycling;
- locating development near other related uses to encourage multi-purpose trips and reduce the length of journeys;
- improving accessibility by walking, cycling and public transport;
- ensuring that transport is accessible to all, taking into account the needs of disabled and other less mobile people;
- promoting walking and cycling.”

Paragraph 9.2.3 states that local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing.

PPW clearly identifies the need to deliver well designed and sustainable development within settlement boundaries and preferably on previously developed or brownfield land.

This proposal meets those aspirations and further requirements included with the various advice notes that support PPW

Technical Advice Notes:

Technical Advice Note 1 (2015): Joint Housing Land Availability Studies, highlights the importance of joint studies, with emphasis on a plan-led system which requires adopted LDPs to be in place. The TAN sets out guidance on JHLA preparation and continues to emphasise the need for local authorities to maintain a 5-year land supply

TAN 12: Design, sets out 12 objectives of good design and it is contended that this proposal meets all of these requirements, which are:

- Ensuring ease of access for all
- 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
- Ensuring attractive, safe public spaces
- Security through natural surveillance
- Achieving efficient use and protection of natural resources
- Enhancing biodiversity
- Promoting sustainable means of travel.



TAN 18 – Transport (2007) provides advice on transport related issues when planning for new development including integration between land use planning and transport, location of development, parking and design of development. Paragraph 2.1 relates to the integration between land use planning and transport, it states: “An efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society.”

Local Planning Policy

The relevant Local Planning Policy is the Neath Port Talbot Local Development Plan 2011 - 2026, adopted January 2016. The Proposal has been designed to adhere to the aims and Objectives of the Core Policies set out in the LDP generally and with specific policies where relevant.

On the LDP Proposals Map the site lies within the urban area boundary but is not allocated for any specific use purposes.

Key Policies

The following Objectives and Strategic Policies set out in the LDP are deemed to apply to the Proposal and have been adhered to. The appropriate section of this document is referenced in blue in the following table:



Ref	Title	Summary
Neath Port Talbot LDP 2011-2026, adopted January 2016		
Strategic Policies		
SP1	Climate Change	Policy setting out required response to Climate Change and how development can reduce its impact. Refer to: The principal of Development, Sustainable Design and Access Statement
SP2	Health	Policy setting out how development can assist in addressing long term health issues with Neath Port Talbot including encouraging Healthier more active lifestyles. The principal of Development and Access Statement
SP3	Sustainable Communities	Policy to deliver sustainable, healthy and cohesive communities and the conservation of the countryside. Refer to: The principal of Development, and Sustainable Design
SP5	Development in the Coastal Corridor Strategy Area	In the Coastal Corridor Strategy Area, sustainable growth and development will be promoted to benefit the County Borough as a whole, while protecting and enhancing the area's character and environment. Refer to Principle of Development
SP7	Housing Requirement	Policy setting out the number of additional homes required to meet the demands identified within the LDP timescale. Refer to: The Principle of Development
SP8	Affordable Housing	Policy to require the provision of affordable housing to meet the identified need within Neath Port Talbot. Refer to: The Principle of Development
SP10	Open Space	Policy including measures to ensure that all residents have access to adequate open space. Refer to Planning Obligations
SP16	Environmental Protection	Policy including measures to ensure that Air, water and ground quality and the environment generally will be protected and where feasible improved. Refer to Sustainable Design & Design Considerations
SP20	Transport Network	Policy including measures to ensure the transport system and infrastructure will be developed in a safe, efficient and sustainable manner. Refer to: Transport

Ref	Title	Summary
SP21	Built Environment and Historic Heritage	Policy including measures to ensure the built environment and historic heritage will, where appropriate, be conserved and enhanced. Refer to: Design Considerations
Detailed Policies		
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. Refer to: Principle of Development
I1	Infrastructure Requirements	In addition to infrastructure improvements necessary to make a development acceptable in health, safety and amenity terms, additional works or funding may be required to ensure that, where appropriate, the impact of new development is mitigated. Refer to Services Capacity
AH1	Affordable Housing	All new developments providing more than 3 housing units will be required to contribute to affordable Housing provision. Refer to: Principle of Development & Planning Obligation
OS1	Open Space Provision	Where there is a quantitative deficiency in outdoor sport, children's play, informal space or allotments, provision will be sought, including the requirement for maintenance, in conjunction with all new residential developments of 3 or more dwellings. Refer to: Planning Obligations
EC4	Protection of Existing Employment Use	Proposals which would result in the loss of existing land or buildings in employment use as defined in Policy EC3 and/or within the existing employment areas identified in Policy EC2, will only be permitted where the certain criteria are satisfied: Refer to: Principle of Development
EN8	Pollution and Land Stability	Proposals which would be likely to have an unacceptable adverse effect on health, biodiversity and/or local amenity or would expose people to unacceptable risk due to the following will not be permitted: Air pollution, Noise pollution, Light pollution, Contamination, Land instability, Water (including groundwater) pollution. Refer to: Communal Safety

Ref	Title	Summary
W3	Waste Management in New Development	Proposals for new built development will need to demonstrate that provision is made for the design, layout, storage and management of the waste generated by the development both during the construction phase and occupation. Refer to: Sustainable Design
TR2	Design and Access of New Development	Development proposals will only be permitted where: 1. The development does not compromise the safe, effective and efficient use of the highway network.....; 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. Refer to: Transport and Sustainable Design
BE1	Design	All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places. Refer to: Design Considerations
BE2	Buildings of Local Importance	Development proposals that would affect buildings that are of local historic, architectural or cultural importance will only be permitted where: 1. They conserve and where appropriate enhance the building and its setting; or 2. It is demonstrated that the development could not reasonably be accommodated without affecting or replacing the building and the reasons for the development outweigh the heritage importance of the site. Refer to: Principle of Development

Supplementary Planning Guidance

The following Supplementary Planning Guidance Documents are deemed to apply to the development generally and have been adhered to in the design of the building as referred to elsewhere in this document, particularly Section 3: Design Analysis:

Ref	Title	Summary
Supplementary Planning Guidance documents		
SPG	Planning Obligations (October 2016)	Sets out guidelines for any Planning Obligations required as part of the Planning process: Refer to Planning Obligations
SPG	Parking Standards (October 2016)	Sets out the standards and level of parking for vehicles and cycles required for developments. It is based on the Welsh Parking Standards 2010. Refer to Transport
SPG	Affordable Housing (October 2016)	Sets out guidelines affordable housing contributions either on or off site for developments of more than 3 new dwellings: Refer to Planning Obligations
SPG	Biodiversity and Geodiversity (May 2018)	Provides information and guidance setting out the expectations on all development proposals to protect, conserve, enhance and manage important habitats, species and sites of geological interest. Refer to Landscape, nature Conservation and Ecology
SPG	Pollution (October 2016)	Provides information about pollution issues in Neath Port Talbot and sets out the relevant matters that will need to be taken into consideration. Refer to Community Safety
SPG	Open Space and Greenspace (July 2017)	Provides information in respect of open space provision in Neath Port Talbot and sets out the relevant matters that will need to be taken into consideration when developments are being planned in the County Borough. Refer to Planning Obligations
SPG	Design (July 2017)	Provides guidance on all aspects of good design including layout, materials and amenity standards. Refer to Design Considerations

Planning Appraisal

The previous chapter identifies the relevant planning policies that should be taken into account in developing the design and assessing the Planning Application. Accordingly, this chapter provides an appraisal of the proposed development against this planning policy framework and other material considerations to demonstrate the acceptability of the proposals in Planning terms.

The key issues have been identified as:

- Principle of Development
- Planning Obligations
- Design considerations
- Sustainable design
- Transport
- Services Capacity
- Flood Risk
- Communal safety
- Landscape, nature Conservation and Ecology

The proposed site lies in the Port Talbot Ward and falls within the Coastal Corridor Strategy Area of the adopted LDP.

The site is not a Regionally Important Geodiversity Site.

The Principle of Development

The development proposal is to provide 100% on site affordable housing, operated by a local RSL, in an area with an identified need for such housing. The proposals include for a mix of apartment types that has been tailored to meet the identified demand.

The site is previously developed, lies in an urban area, close to the Town Centre, local amenities and public transport. These include a range of community and retail facilities located within easy walking distance of the site. The site is in an extremely sustainable location and provides an ideal opportunity to provide much needed housing close to a major public transport hub which offers easy access to potential employment locations.

PPW presumes in favour of sustainable development and the proposed development would satisfy PPW's objectives of achieving sustainable development by ensuring that local communities have sufficient and affordable housing for their needs and promoting access to employment, shopping and other facilities.

The redevelopment of brownfield sites within sustainable locations is supported by both national and local policies. The site lies within the urban boundary as defined on the Local Development Plan Proposals Map and the proposed development of 100% affordable housing in a highly sustainable location is compatible with LDP Policies SP1, SP3, SP4, SP5, SP7, SP8, SC1 and AH1 and TR2



The Pre application advice received has indicated that the principle of development is generally agreed subject to certain matters being suitably addressed, one of which is the existing building.

The existing building on the site, Eagle House, is identified as a Building of Local Importance and is listed in the SPG: Schedule of Buildings of Local Importance (page 397).

The LDP (Policy BE2) requires that it can be demonstrated that *“the development could not reasonably be accommodated without affecting or replacing the building and the reasons for the development outweigh the heritage importance of the site”*.

The principle of the proposed development has been set out above together the identified need in terms of Housing provision within the Ward generally. To be a viable proposition as a Housing site requires a minimum number of apartments to be provided on the site. Given that the existing building is only 2 storeys and occupies a relatively small proportion of the site it is not possible to achieve the required density by altering or adapting the existing building.

On the basis that the need for the development is accepted the Pre-Application advice requires evidence of the contribution, by way of its design, that the proposed building would make to the historic, cultural and architectural context of the immediate and wider surroundings.

The existing building has, over the years, been somewhat diminished in scale on what is an important streetscape within the Town Centre area. At only 2 storeys it struggles to compete visually with the surrounding buildings, particularly the Plaza cinema and the Grand Hotel. In addition to building fails to respond to its location at a significant corner of Talbot Road, which has been reinforced by the provision of the new Transport Hub and pedestrian plaza.

The new building, by way of its scale and its response to the curved corner of the site facing the plaza, provides a much stronger visual end to the plaza.

The proposed materials and detailing provide a high-quality building that makes reference to the new building on the former Police Station site to the North of the Grand Hotel.

The proposal meets an identified social and community need, is an appropriate architectural response to the site and the surroundings and will be a significant and important addition to the setting of the new transport hub.

For these reasons it is believed that the proposal meets the tests of Policy BE2.

The existing building is currently used as commercial office space. As confirmed in the pre application advice, any proposed development will be required to retain an element of commercial/retail space on the Ground Floor to ensure compliance with Policy EC4. The proposed scheme includes for all of the Ground Floor to be commercial use and as such meets the requirements of EC4.

Planning Obligations

The proposal is for 100% Social Rented Housing owned and operated by a Recognised Social Landlord. The scheme is supported by the Local Housing Officer and we understand that it will be fully grant funded. As such it is not anticipated that contributions for affordable housing will be required in accordance with Policies SP8 and AH1.

As the proposed development is over 3 units the requirements of Strategic Policy SP10: Open Space and detailed Policy OS1 may apply. The application site is in the Port Talbot Ward, which is in the Coastal Corridor Strategy Area for policy purposes.

Table C.0.1 of the Open Space SPG identifies that the ward is deficient in Pitch Sport, Non pitch sport, Informal, Children's Play and Allotments. As such it is anticipated that Planning Contributions for Open Space may be required.

As the proposed development consist of less than 10 no 2-bedroom apartments (4 number) and in line with paras 5.4.3 and 5.4.4 of the relevant SPG, Planning Obligations for Education will not apply.

Whilst Community Facilities were mentioned in the Pre-Application advice it seems that the area is reasonably well served. In addition, the proposed Community development in the adjacent Plaza Cinema site will increase the current provision. As such it is not anticipated that Planning Obligations will be required in relation to Community Facilities.

It is not envisaged that any other Planning Contributions will be required as confirmed in the Pre-Application Advice.

Design Considerations

This Design and Access Statement and plans submitted clearly demonstrate that the scheme will make a positive contribution to the local environment, in terms of its relationship with the surrounding area.

The proposed scheme responds to the local character, referencing the existing residential developments in the area to ensure that the overall site has a legible architectural character, which is easy to navigate and creates a sense of community and enclosure.

A palette of materials has been selected which complement the site context, and with sustainability at the forefront, particularly energy efficiency, noise and sound insulation

Detailed information is provided on the design process and outcomes in the preceding section 3: Design Analysis.

The Design is considered to be entirely in accordance with Policies SP16, SP21, BE1, and TR2 and also in accordance with the Design SPG.

Sustainable Design

The design has been developed with sustainability at the core of the process. The site is in an inherently sustainable location (see Access Statement and Site Analysis) and is accessible by public transport, cycles and pedestrians.

The Environmental Sustainability chapter in the previous section demonstrates the sustainable nature of the building in construction and operation and the commitment to try and achieve net zero carbon in operation.

The sustainable nature of the proposed development is entirely in accordance with Policy SP1 para 14.

Transport

The proposed development is in a sustainable location and is easily accessible by, foot, cycle, car and Public Transport. There is a bus and main line train station within close proximity to the development which provides access to services to the local area and wider Public Transport network beyond. The Sustainable location of the site meets the requirements of SP1, SP2, SP3, SP4, SP16, SP20, TR2 and the Parking Standards SPG.

On site parking provision for cars and cycles is generally in accordance with the adopted SPG for Parking. The easy availability of pedestrian routes and nearby cycle trails promotes Active Travel in accordance with Policy TRA2 and the Parking Standards SPG.

Detailed information is given in Section 5: Access Statement (Parking) and elsewhere in this document.

Flood Risk

As set out in Section 2 the site is within a C1 Flood Zone. A detailed Flood Consequence Assessment (FCA) has been prepared and included within the Planning Application. The FCA shows that the tests for development in TAN 15 have been met and sets out the parameters required to ensure that the design meets the technical requirements of TAN 15 and that the safety of occupants and residents, as well as the wider community, is protected.

Details of the measures taken are included in the previous design analysis section.

Services capacity

There is suitable capacity in the existing foul sewer system to accommodate the development as confirmed by Dwr Cymru/Welsh Water. All other services are present adjacent to the site and have sufficient capacity to serve the proposed development. The Proposal does not have any negative impact on local infrastructure facilities and is in accordance with Policies SP4, SP16 and I1.

A detailed drainage design has been prepared in accordance with SUDS principles and has been submitted to the appropriate SAB Board in tandem with this planning application.

Communal Safety

Provision is made for existing and future residents with the adoption of measures incorporating recognised designing out crime principles to ensure compliance with Policies SP3 and the Design SPG. The design will be registered with Secured by Design (as referred to in Section 3: Design Analysis) and all recommendations of the Designing Out Crime Officer will be incorporated into the submitted proposals. The SBD Report will be included in the Planning Application.

The proposals will not have an adverse impact on neighbouring properties. There are no perceived implications for Noise, air or light quality either at or from the proposed development. The proposals therefore meet the LDP policies as set out in Section 2: Site Analysis (Acoustic Environment and Air Quality) and Section 3 Design Analysis.

A desktop Site Investigation Report (21035R1 - Phase 1 Desktop) has been prepared and submitted as required by Policy EN8 and requested as part of the Pre-Application advice provided.

The Report provides recommendations to ensure that there is no risk during construction or in use, from any identified contaminants. The Design Proposal meets the requirements of SP16 and EN8.

A Construction Environmental Management Plan (CEMP) will be included in the Planning Application in line with the pre application advice received.

Landscape, Nature Conservation and Ecology

The site currently has limited Ecological value. The proposed design includes a limited Landscaping scheme which will improve and enhance the biodiversity of the site and meet the requirements included in the SUDS regulations.

Measures to improve biodiversity have been included within the design and described in the previous section and will be refined once the full details of any additional ecological surveys have been obtained.

The proposal will result in a net gain in biodiversity in accordance with the relevant SPG.

Consultation

Flooding NRW

The Environment Agency web site and Development Advice Map has been consulted and it has been identified that the site lies in a C1 Flood Zone. See Site Analysis and Design Analysis sections for details.

Coal Authority

The LDP Constraints Map does not identify the site as being in an area at risk from Coal mines or mining activity. The Desktop Site Investigation Report confirms that the CON29M Coal Mining Report does not identify and risks from Coal Mining

Pre-Application Advice

An application for Non-Statutory Planning Advice, with a request for a meeting was submitted on 23rd June 2020.

A Pre application advice letter (ref Q2020/0101) was received on 10th December 2020, which raised a few issues with the submitted design and set out what would be required in support of a formal planning application.

The main issues raised were:

- the requirement to provide a suitable justification for the demolition of the existing building given its status as a building of Local Importance,
- The requirement for a Flood Consequence Assessment given the location in a C1 Zone,
- The need to provide a CEMP as the site is located within an Air Quality Management Zone.
- The need to provide a desktop contamination/site investigation report.
- The need to provide a bat survey.

The above matters have been dealt with in the previous sections of this document.

In addition to the above, the initial pre application advice set out what information would be required with a future planning application. The table below sets out these requirements and lists the information submitted in support of the application:

Information requested	Information submitted
PAC Report	(to be provided when PAC complete)
Design & Access statement	1487:PL1:DAS
Flood Consequence Assessment	90617-CastellGrp-EagleHs_v1_020621
Bat Survey and mitigation	P1876 Eagle House, 13-5-2021 and 03-8-2021
Biodiversity Enhancement Scheme	See Section 3

Contaminated Land study	21035R1 - Phase 1 Desktop Spectrum
Streetscene elevations	1487:PL1:11
Travel Plan	1487:PL1:TP
Demolition and Construction Environmental Plan	1487:PL1:CEMP
Piling Method Statement	Refer to CEMP above
Details of Bin and Recycling Storage	1487:PL1:04 Site Plan
Noise Impact Assessment	8972, Eagle House, Port Talbot - 1st Issue

Pre-Application Consultation (PAC)

Section 17 of the Act and the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) as amended by the 2016 Order requires formal Pre-Application Consultation to be carried out for all major developments. A major development is defined as residential scheme that includes more than 10 houses and as such this scheme is subject to this requirement.

Guidance on carrying out the pre-application consultation requirements within the Act has been provided by the Welsh Government set out in Article 1 of the Town and Country Planning DMPWO (Amendment) 2016 'Guidance on Pre-application Consultation'.

The full process has been carried out and the results have been collated in a formal Pre-Application Consultation (PAC) Report that has been included as part of this application (document 1487:PL1:PAC).

The consultation produced no adverse comments and no significant requests for changes to the published proposals with the exception of comments received from NRW.

The comments from NRW related to safe access/egress in the event of flooding and suggested that this was a matter for the Local Authority to consider. It is assumed that additional discussions will take place with the Planning Authority as part of the application process to establish the level of risk and if this risk can be mitigated.



5.0 Access Statement

This section explains how the proposed access arrangements make reasonable provision for all users have equal and convenient access into the site from its boundaries, within the site itself and also within the building.

The following legislation and guidance have been referred to during the design process and have influenced the design in terms of access:

- The Disability Discrimination Act 1995
- Building Regulations Part M (Access to and Use of Buildings)
- BS8300:2001 (Design of Buildings and their approaches to meet the needs of disabled people)

A summary of the site's accessibility in terms of public transport links, walking and cycling connections and access to local facilities is included below.

Movement to and from the Site

The Proposal is designed to be accessible to all. The site is accessible by car, cycle, walking and is close to public transport connections providing a range of transport options for potential residents. The site is also close to local amenities reducing reliance on the car and the number of trips generated by the proposed development, all in accordance with Policies of the Local Plan.

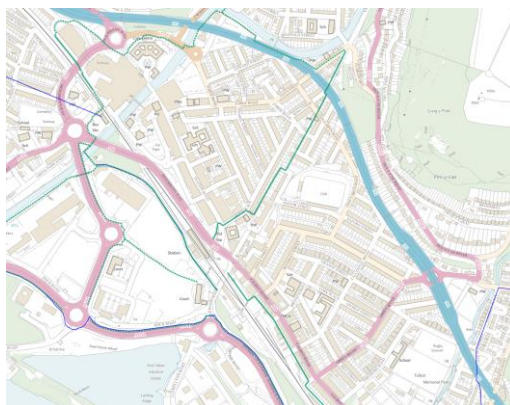
The following sections set out the current situation and any measures proposed as part of the proposal to reduce dependence on the private car.

Pedestrian Access

The site is fully accessible by pedestrians via adopted footpaths along Talbot Road and Oakwood Lane, which connect the site to the wider footpath network within the local area including the newly constructed Public Transport Hub and Port Talbot Town Centre to the North.

There are identified Active Travel Routes (existing and proposed) close to the site (see opposite)

The majority of roads within the vicinity of the proposed development have footway provision on one or both sides of the carriageway.



The Chartered Institute of Highways and Transportation (CIHT) guidelines 'Providing for Journeys on Foot' indicate that the desirable walking distance for commuting and school journeys is 500m, the acceptable walking distance is 1km, and 2km is the preferred maximum.

The guidelines also indicate that walking trips for other purposes have a desirable walking distance of 400m, acceptable distance of 800m and the preferred maximum of 1.2km.

CHIT Table 3.2: Suggested Acceptable Walking Distance.

	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

The table following this section shows the local facilities/amenities within walking distance of the proposed development.

There is a Primary School within desirable walking distances. There is also a Hospital within desirable/acceptable walking distance from the site and a number of bus stops within 30-50m of the site entrance.

There is a major Supermarket within the preferred maximum distance and a number of convenience stores located close to the site.

Details on walking distances are given in the table in the Sustainability calculator.

Given the reasonably good pedestrian links there are no additional proposals necessary to increase accessibility for pedestrians other than the ongoing promotion of walking as an environmentally friendly and healthy alternative to the private car.

Cycle Access

The site is readily accessible by cycle and cycle storage is provided as part of the design in accordance with the Parking SPG.

The Local Authority Active Travel Plan (see https://maps.npt.gov.uk/active_travel_single_final/ and extract below) identifies Oakwood Lane as a cycle friendly route that connects to other dedicated cycle lanes in the area. This is accessible within 40m of the site entrance.

Vehicle Access

The site is well served for vehicle access with all local roads being suitable for both car and commercial vehicle access.

The site is immediately accessible from Talbot Road and Oakwood Lane which provide access to the wider road network including the M4 to the North of the site. The M4 provides easy access to the wider national road network.

Public Transport Access

The new Public Transport Hub (Port Talbot Parkway) is located within 30m to the North of the site and gives access to a wide range of bus services along with mainline train services to Cardiff, Swansea Bridgend and Neath as well as the wider National (UK) rail network.

There are also bus stops on Talbot Road close to the site and Port Talbot Bus Station is approx. 720m (walking distance) to the North of the site.

These stops give access to a number of bus services including 66, 87, X1, X3 and 901 at Parkway and 9, 66, 81, 82, 83, 84, 87, 901, 902, X1 and X3 at the Bus Station. There are other bus stops within easy walking distance that provide access to additional services. Details of the above services are included in the Sustainability calculator in the parking section of this document.

All of these public transport facilities are well within recognised walking distances as set out in national guidance documents such as the CHIT 'Providing for Journeys on foot' referred to above.

Public Transport frequency:

The following is a selection of bus services that call at the stops identified above:

Route Number	Route	Frequency
9	Port Talbot - Sandfields	hourly between 08.38 and 16.38
66	Goytre - Aberavon	hourly between 07.12 and 20.30
81	Port Talbot - Brynbryddan	30 mins between 07.19 and 19.05
82	Port Talbot – Golden Ave, Sandfields	30 mins between 08.00 and 28.18
83	Port Talbot – Blaengwynfy/Glyncorrwg	hourly between 07.32 and 18.55
84	Swansea – Port Talbot (via Sandfields)	hourly between 06.30 and 18.48
87	Margam – Neath (via Port Talbot)	hourly between 08.25 and 17.25
900	Port Talbot – Neath College	Timetable reduced due to Coronavirus
901	Margam – Neath College	Timetable reduced due to Coronavirus
902	Port Talbot – Neath College	Timetable reduced due to Coronavirus
X1	Swansea- Bridgend via Port Talbot, Pyle	20 mins between 06.36 and 18.45
X3	Port Talbot – Maesteg via Bryn	Hourly between 07.02 and 18.40

The bustimes.org web site: <https://bustimes.org/localities/port-talbot#> gives timetables for all buses departing from the Bus Station and Parkway.

Opposite is an extract from an online live departure board for Port Talbot Parkway Train services showing a train approx. every 20mins.

From the above it can be seen that the combined frequency of service to Port Talbot, Sandfields, Neath, Swansea and other major destinations is approximately every 5 minutes or less during the required hours.

Please note that not all times were available at the time of writing due to the Coronavirus outbreak. Actual frequency may be increased when timetables return to normal.

Live departures and arrivals for Port Talbot Parkway

Departures		Arrivals	
Due	Destination	Platform	Expected
16:39	Cardiff Central	1	On time
16:41	London Paddington	2	On time
17:11	Swansea	1	On time
17:12	Manchester Piccadilly	2	On time
17:30	Cardiff Central	2	On time
17:41	London Paddington	2	On time
17:43	Cardiff Central	1	On time
18:14	Swansea		On time
18:15	Manchester Piccadilly		On time
18:21	Milford Haven		On time

Movement within the site and buildings

The development is generally accessible to all.

The buildings will be designed to fully comply with the requirements of Part M of the Building Regulations.

The internal layouts of all of the dwellings have been designed to ensure access for all. All have been designed to meet the Requirements of Part M of the Building Regulations and Lifetime Homes.

A level approach is provided to all dwellings with an appropriate low rise threshold included to enable disabled access.

All internal doors will be appropriately sized to accommodate disabled users and will be finished to ensure they are visible to those with partial sight.

Parking

Car parking provision for the proposed development is required in accordance with Neath Port Talbot Council Parking Standards, October 2016, which is the relevant supplementary planning guidance of the Local Planning Authority.

The parking standards also refer to the use of Travel Plans and the sustainability of new developments.

The parking standards quotes paragraph 8.4.2 of Planning Policy Wales which states: 'Car parking provision is a major influence on the choice of means of transport and the

pattern of development. Local authorities should ensure that new developments provide lower levels of parking than have been generally achieved in the past. Minimum parking standards are no longer appropriate.'

The document also notes that: 'These parking standards will inform observations made by the Highway Authority at Neath Port Talbot Council on applications received for Planning Permission.'

The adopted parking standards introduced a system of zones for parking and the standards 'lay out six such zones, each with differing designated levels of parking requirement for development management purposes.'

It is considered that the proposed development site is located in a Zone 2 Town Centre or City Centre Fringe location as per the definition detailed in the parking standards and the maps in Appendix A of that document.

Car parking provision for the proposed development will be provided in accordance with NPT's adopted maximum parking standards as set out below.

For Residential new build and Conversions in Zones 2-6, the Parking Standards require 1 space per bedroom with a maximum of 3 for each dwelling, with 1 visitors' space for every 5 dwellings. The standards for the Commercial Units require 1 space per 20m². The GIA of Commercial area is 180m².

The following is the parking requirement if the SPG guidance is applied:

Apartment Type	Number/area	Maximum Parking Standards	Maximum spaces
1 bed Apartment	14	1 space per bed	14
2 bed 3 person	6	1 space per bed	12
Commercial space	180m ²	1 space per 20m ²	9
Visitors		1 space per 5 units	4
TOTAL (apartments)	20		39

Based on this calculation a **maximum** of 39 spaces would be required for the development.

20 spaces are shown on the site plan. Whilst this is below the maximum number suggested by the Parking Standards it is an appropriate number for the specific development based on the extremely sustainable location of the site and the availability of Public Transport.

There are a number of factors that should inform an assessment of what is an appropriate number of parking spaces. This would include the likely level of car ownership and the sustainability of the location.

The Car Parking Standards SPG includes sustainability criteria in Appendix F that allows the parking levels to be reduced if certain criteria are met. This site meets many of the stated criteria as set out in the following chapter.

Sustainability calculation

The following section sets out the process by which the SPG's Sustainability calculator has been used to generate sustainability points that can reduce the maximum number of car parking spaces required per house type.

The table below lists a series of local amenities and gives the true walking distance from the site. The table also includes an assessment of the Sustainability points available against each category.

All distances have been measured along accessible pavements and not 'as the crow flies' to give a true walking distance. Distances have been measured using Google Maps and calibrated against a CAD based OS sheet to ensure accuracy.



The above map shows a selection of local amenities, the actual walking distances are shown in the table below, the circles indicate a selection of isochrones.

The following table summaries the Sustainability points available given the locations of local amenities and frequency of bus services described above:

Facility	Distance *	Score	Notes
Local Facilities			
Post Office (Tesco)	555m		
Health facility – Well Pharmacy	510m		
Neath Port Talbot Hospital	625m		
School – Central Junior School	310m		
School – Central Infants School	690m		
Food Store – Tesco superstore	555m		
Public Transport			
Bus Station	720m	3pts	Bus stop within 300m scores 3pts
Port Talbot Parkway	58m		
Cycle Route			
N/A		0pts	
Frequency of Public Transport			
Bus stop within 800m which operates between 7am and 7pm	5 mins	3pts	See table above for bus frequency
TOTAL POINTS		8	

* Note. The distances in blue have been used to generate the relevant score in the third column. Details

A sustainability score of 8 is therefore achieved. This allows a reduction of 1 space per apartment (dwelling), with no lower limit on spaces and a reduction of 20% for the retail units. The impact on the maximum parking spaces by type is shown below:

Use Type	Number	Maximum Parking Standards	Maximum spaces	Sustainability Reduction	Adjusted number
1 bed apartment	14	1 space per bed	14	14	0
2 bed 3-person apartment	6	1 space per bed	12	6	6
Commercial units	4 (180m ²)	1 space 20m ²	9	20% **	7.2
Visitors	4	1 per 5 units	4	4	4
TOTAL			39		17

As the chart shows the new maximum number is now 17, including commercial and visitors spaces.

Whilst the required maximum number of spaces is 17, the available site allows for 19 spaces in total. The spaces have been allocated as set out on the submitted site plan and described previously, with 9 spaces allocated for Commercial (i.e. sustainability reduction not claimed).

Whilst the number of spaces for the apartments (6) is less than 1 per unit the HA have confirmed that do not require parking spaces for their tenants given the highly sustainable location of the site.

Whilst the Sustainability calculator is deemed sufficient justification of the reduction in the residential parking, a Draft or Framework Travel Plan (1487:PL1:TP) has been prepared to support the reduction generally. Whilst primarily prepared for the Commercial Units the Travel Plan could also be used by the operator of the affordable apartments to assist in the reduction of car trips to and from the building.

Cycle Parking

The parking standards require 1 cycle stand per 5 bedrooms and 1 stand per 200m² of commercial area for short stay and 1 per 1000m² for long stay. This results in a requirement for 8 cycle spaces.

There is a dedicated lockable internal cycle store on the Ground Floor of the apartments that has sufficient space to accommodate up to 20 cycles by the use of two tier cycle stands.



The over provision of cycle storage is part of the strategy set out in the Travel Plan and is a further factor in the justification for the general reduction in car parking spaces in line with current Welsh Government emphasis on active travel and reduction of car use.

The proposed cycle storage solution is shown above:

There is also space within the apartments for the storage of cycles if required, which is often preferable to external storage.

6.0 Summary and Conclusions

The current proposal is for the development of commercial units and 20 high quality affordable apartments in Port talbot Town Centre. The project meets the following requirements:

- The completed development will be managed by a recognised Registered Social Landlord delivering high quality affordable accommodation for the people of Port Talbot.
- The proposal is for a high-quality development to address an identified need for new affordable housing within Port Talbot.
- The site is in an accessible and sustainable location with easy access to many local facilities and public transport options.
- The proposal has minimal impact on adjacent occupiers and has no impact on their amenity.
- The dwellings will be sustainable in its construction and operation and aim to achieve net zero carbon in operation.
- The proposal is in line will all policies identified in National Planning Guidance, the adopted Local Plan and Supplementary Planning Guidance.

For these reasons it is felt that this is an appropriate development that will meet with the approval of the Planning Officers and the Local Authority Planning Committee.