

**Planning, Access and Design Statement for the conversion of a dwelling (C3) into a 5-bed
House of multiple occupancy HMO (C4)**

June 2022



1. INTRODUCTION

This statement has been prepared in support of a full planning application for the change of use of the property known as 7 Clarice Street, Port Talbot from a dwelling (C3) into a 5 bed HMO (C4).

2. DESCRIPTION OF THE SITE

The site is a two-storey end of terrace dwelling with a pitched roof in a residential area with a rear garden which has got access from the front and a lane running along the side of the terrace

The existing dwelling consists of a living and dining room, with a kitchen – utility and toilet extension on the ground floor. On the first floor, there are three bedrooms.



3. PLANNING HISTORY

The property has the following Planning History:

GARAGE – Ref. No: P1989/7344

KITCHEN BATHROOM EXTENSION SINGLE STOREY – Ref. No: T1977/1827

4. THE SURROUNDING AREA

The application site lies in Port Talbot. Clarice Street consists of a row of two storey terraced houses with no front garden. The street is adjacent to the A241.

Most of the terrace dwellings are of the same proportion with 2 windows on the first floor and a front door and a window on the ground floor, of a similar size. Most dwellings have been modernised with external insulation and a pebble dash finish.

5. ACCESSIBILITY

The property benefits from the close proximity to the M4 motorway and direct access to the A48 dual carriage way. The property is lacking in dedicated off-street parking spaces, there is however on-street parking on both sides of the road.

The Bus and Train Station are also in close proximity and subsequently comfortable walking distances.

The main shopping centre, including a superstore, is also a short walk from the property.

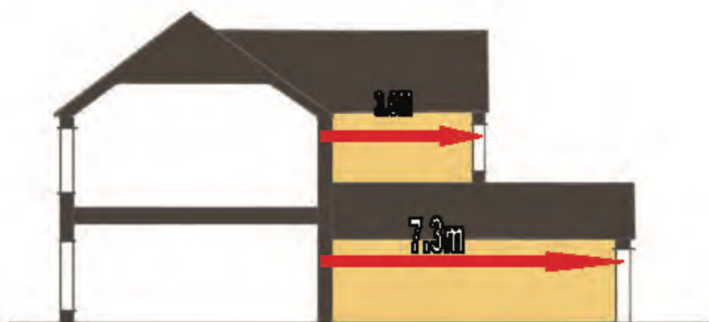
6. PROPOSED DEVELOPMENT *The proposal is for a conversion of a residential dwelling Use Class C3 to a 5-bedroom HMO, Use Class C4.*

To facilitate the conversion, it is proposed to construct a first-floor rear extension. In order to protect the residential amenity of the immediate adjoining neighbouring property and also the visual aesthetic of the property, the applicant has been mindful to adhere to the design advice contained with the Supplementary Planning Guidance. As can be seen from the submitted plans, the first-floor rear extension will not project off the original back wall more than 3.6m. This design eliminates any issues with regard to the extensions ability to overbear or to overshadow the neighbouring property. The positioning of habitable room windows also ensures there is not any unacceptable overlooking.



Below is an extract taken from the Neath Port Talbot Design Guide (Adopted 2017):

B.2.5 It is therefore considered that the maximum permitted distances that you extend beyond the main rear wall (as defined) would be 7.3m at ground floor level, and a maximum projection of 3.6m at first floor.



7. CHARACTER

As discussed above, the extension is a subordinate addition to the existing dwelling house that will not compete with the architectural merits of the host property. The other external alterations required to facilitate the HMO conversion are restricted to the rear of the property and are also residential in appearance. Consequently, the character and appearance of the streetscene and surrounding area will remain unaffected. And certainly, not to a level that would warrant a refusal recommendation on visual amenity grounds

The 5 bed HMO is considered appropriate for a dwelling of this size

The use of the property will be for 5 persons which will not be significantly different to that of many houses which are occupied by families. It is therefore considered that the noise and disturbance associated with the comings and goings to and from the property are unlikely to be different when compared to that of a family property.

Therefore, it is considered that the proposed six-bed HMO would not lead to unacceptable levels of noise, disturbance or nuisance.

8. COMMUNITY SAFETY – ISSUES

The proposal will not impact or impede on the existing flow of the pedestrian traffic on the adjoining properties. The proposal will assist with the natural surveillance of the area. We believe that the development will not create any negative impact on the community safety.

HMOs represent an efficient use of building resources, where a single house can be fully utilised to provide accommodation for multiple people. This will have positive contributions and important socio-economic role for an area. The positive impacts of HMO's are that they are catering for the increased number of students, the need for affordable and flexible housing tenancies, and the changes to Housing Benefit, their role within the housing market. This proposal will not reduce the provision of community facilities for families and children.

Social Benefits HMO's can play an important role in providing a suitable mix of housing types. This proposal will support the development of equal and more cohesive communities in area. This development should not have any impact upon the property value of the area, which itself is not a material planning consideration. At present the Council does not have any specific local Policies aimed at HMO's. This is due largely to the absence of any significant historical issue in the area, and the introduction of the C4 Use Class post adoption of the LDP. The supporting documents champion this claim where it is displayed that there is not an existing HMO property within a 50-metre radius of the application site.

9. PARKING

Policy TR2 of the Local Development Plan states that permission will only be granted for development that is acceptable in terms of access, parking and highway safety. The policy also requires that sufficient parking and cycle provision is provided and that the development is accessible by a range of travel means. In this respect, the site is situated in close proximity to the Port Talbot Parkway Train Station, as well as other local facilities and local restaurants.

The approved Parking Standards SPG does not specifically refer to Class C4 HMOs, but it is considered that a residential use should be subject to the same parking standards as for the existing C3 dwelling house, with both uses requiring a maximum of 3 parking spaces.

The current residential use of the dwelling does not have any off-street parking provision. The application proposes to utilise the space in the rear garden to offer up to 3 number parking space and a cycle store. This is over and above what is currently required for the use class but is nonetheless something that the applicant is passionate at providing for.

Given that the parking requirements are the same for the existing and the proposed uses, the proposed use will not increase the impact upon on street parking over and above the current position. It will in fact offer a 'betterment' in terms of parking provision.

10. ACCESSIBILITY

Full accessibility has been addressed wholly in compliance with requirement under Part M of the Building regulations as well as the rights of the Disability Commission Code of Practice "Rights of Access, Services and Premises". Appropriate level access IS provided at its current stage via the front as well as the rear of the property.

11. LOCAL PLANNING POLICIES

The Development Plan for the area comprises the Neath Port Talbot Local Development Plan which was adopted in January 2016. On this basis, the following policies are considered of relevance to this proposal and have been given full consideration

National Planning Policy Planning Policy Wales Technical Advice Notes Technical Advice Note 12: Design
Local Planning Policies

Topic based Policies • Policy SP1 Settlement limits • Policy TR2 Design and Access of New Development • Policy BE1 Design • Policy SP3 Sustainable Communities • Parking Standards (October 2016)

SP1 – SETTLEMENT LIMITS

The proposed development is within the settlement limits of the Policy SC1, which states that the "development within settlement limits 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"

Since we not proposing any change to the form, scale and nature of the property it is considered that the development is proportionate in scale to its surroundings.

SP3 – SUSTAINABLE COMMUNITIES SP3 state that the delivery of "sustainable, healthy and cohesive communities and the conservation of the countryside" will be promoted by the "identification of a settlement hierarchy that reflects the role and function of settlements. New development should be therefor come considered in more sustainable location of the county. This dwelling is located within the Aberavon Table 3.1 of the LDP, as a "large Local Centre", it has got adequate transport links with clusters of one or more retail units and local services, with one or more community facilities and employment provision". We believe that in light of the above and the LDP this development is clearly positioned well

within the settlement hierarchy and therefore will promote sustainable development in adherence of the requirements of the policy SP3.

Policy TR2 – DESIGN AND ACCESS OF NEW DEVELOPMENT The proposed development has to comply with Policy TR2 and must adhere as appropriate to the requirement of four criteria. Criteria 1: the development do not “compromise the safe effective and efficient use of the highway network” It is considered that the site will not impact on the highway safety or create unacceptable level of traffic. Criteria 2: the requirement is to have appropriate levels of parking and cycling facilities provided. The matter of the parking has been looked into under “Parking and Access” Additionally the rear garden provides sufficient space for the safe storage of bikes. It is considered that this point will be passivated. Criteria 3: the requirement is that the development is accessible by a range of travel means. The property is in close proximity of bus links, the train station and cycle paths. We believe that this criterion has been sufficiently met. Criteria 4: the requirement is for a Transport Assessment and Travel Plan. Since the development will not be increased in size and has already got a residential use, we believe that this requirement is not necessary as no new traffic will be created. In summary all four Criteria of the Policy TR2 have been fulfilled.

Policy BE1 – DESIGN

The policy states that “all development proposals must be of a high-quality designs” and “taken into account the natural, historic and built environment” and set out criteria to archive this.

The outer appearance of the property will not be altered. The outdoor space to the rear will remain untouched save for the parking provision which may in fact be deemed unnecessary.

The building will only be altered minimally with the modest first floor extension

The existing drainage system was design to limit surface water run-off and flood risk. This will not be amended (Criteria 9)

In summary, all necessary requirements of Policy BE1 will be meet.

PARKING STANDARDS SUPPLIMENTARY PLANNING GUIDIANCE

The SPG sets out the parking requirement for all forms of development, which differ slightly dependant on which zone a proposal is located. The applicant site lies within Zone 3 – urban – of the Parking Zone Designation. The table below shows the maximum parking standards for the provision of off- street parking spaces for a resident development in this zone.

However, there is no specific parking requirement for an HMO property and the maximum requirements are based on a house conversion to a number of bedsit's.

Based on the table above the requirements for bedsits would be 3 spaces for the residence and 1 additional for visitor. In total 4 car parking spaces. Given that this number would be the required amount for the existing dwelling, no additional space would be necessary.

Annex F of the SPG allows for a reduction of the number required at a sustainable location, depending on site distance to public transport and community facilities by a point system where 7 points would reduce

one space and 10 or more will mean a reduction of 2 spaces.

Based on this guidance and the close proximity to local amenities, public transport and local community facilities, this site scores in excess of 10 points and is a sustainable location. Taking into account that no changes will be necessary to amount of provided space from the existing use, we considered these criteria are met.

Type of Development	Residents	Visitors
Dwellings, Apartments, House Conversions to Bedsits, or Self-Contained Apartments	1 space per bedroom (Maximum requirement 3 spaces per apartment)	1 space per 5 units

Type of Development	Operational	Non-Operational
Shops (< 200m ²)	1 commercial vehicle space	1 space per 60m ²

12. CONCLUSION

In the absence of a HMO Policy, this application should be determined with current LDP Policies. Since the site is located within the settlement limits defined by Policy SC1 of the LDP and therefore the principle of residential development (albeit a Class C4 HMO use rather than a Class C3 dwelling house) would be acceptable subject to an assessment of its general impact, which includes the consideration of any potential wider impacts on local character and social / community cohesion created by Class C4 uses, as well as other amenity / highway issues.

We believe that the proposed development would represent an acceptable form of development in a sustainable location. The property is within easy walkable reach of a range of community facilities along an excellent public transport links. These will ensure that the site can sustain a sustainable transport pattern away from the necessity of a car.

It would not have a detrimental impact upon local character or community cohesion, on residential amenity or upon the character and appearance of the surrounding area, and there would be no adverse impact upon highway and pedestrian safety. Nor would it have an impact on the visual amenity of the area.

We also believe that the proposal represents an appropriate and sustainable development in accordance with Policies SC1, TR2 and BE1 of the Neath Port Talbot Local Development Plan.