

Neath Working Men's Club, Wind Street

Transport Statement

Client: Castell Construction Ltd

16 June 2022

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1. INTRODUCTION

1.1 Background

- 1.1.1 Apex Transport Planning Ltd ('Apex TP') has been commissioned by Castell Construction Ltd to produce a Transport Statement (TS) in relation to a proposed redevelopment of the Neath Working Men's Club site for a residential use.
- 1.1.2 The application site ('the site') is situated to the north of Wind Street and south of High Street within Neath Town Centre.
- 1.1.3 The proposals are for a redevelopment of the site for 37 apartment units over four floors. There will be no on site car parking provided given the site's highly sustainable location. However, the proposals will retain the existing delivery and servicing bay. A large cycle store for approximately 32 bicycles will be provided in a secure storage on the north of site with direct access from High Street.
- 1.1.4 This TS provides an assessment of the sustainable connectivity and transport impacts of the proposed development and sets out details of the proposed parking and access arrangements. This TS has been produced to inform the local highway authority, NPTCBC, of the highways and transport implications of the proposals.

1.2 Scope of Report

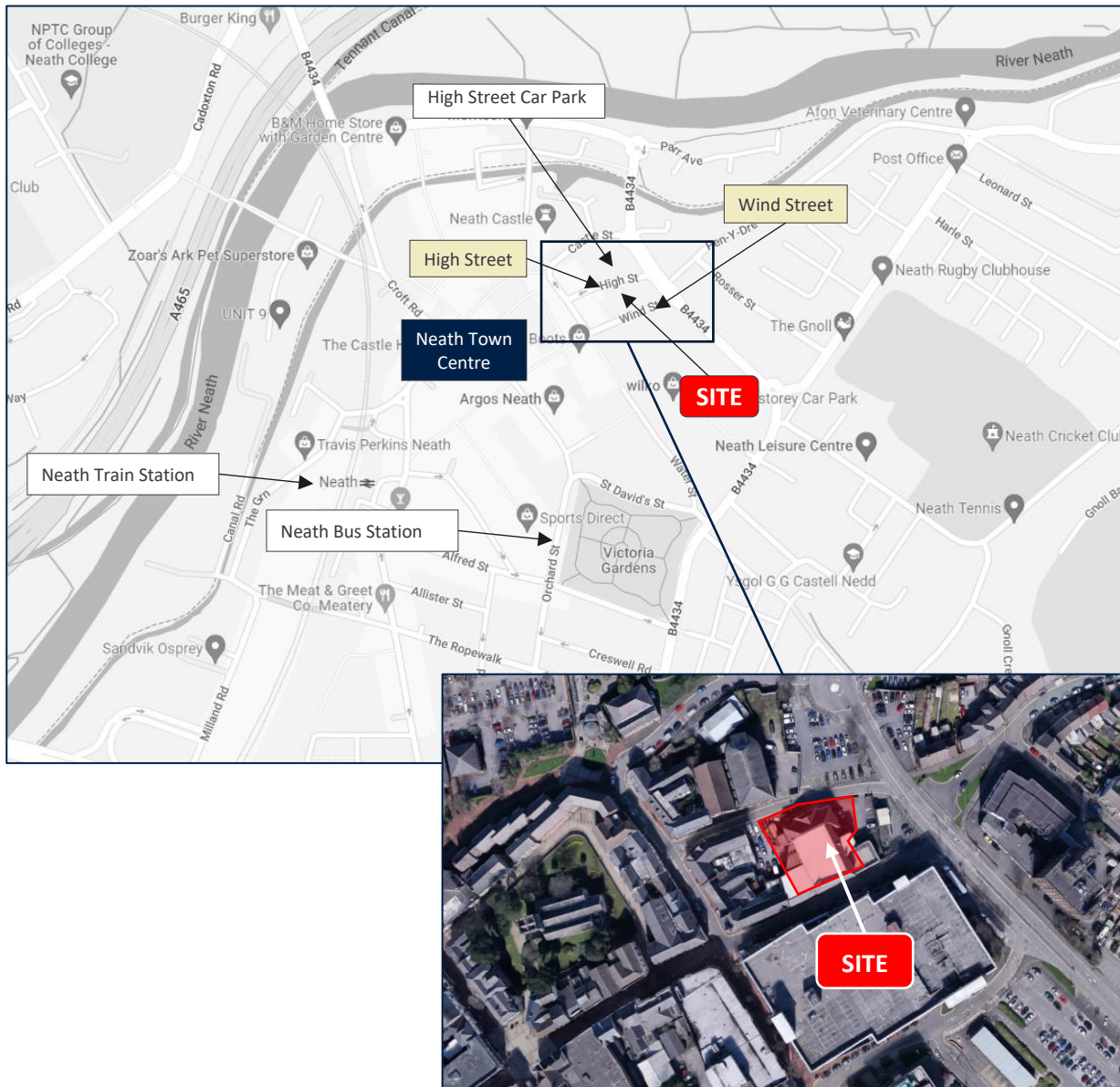
- 1.2.1 The scope of this report has considered pre-application advice provided by NPTCBC in relation to the proposals. The specific highway authority comments have been set out in Appendix A. Specifically the comments raised related to parking, servicing and refuse collection and these have been covered in full within this TS.
- 1.2.2 The scope of work has also considered policies and advice set out in Future Wales, Planning Policy Wales 11 (PPW11), Technical Advice Note 18: Transport (TAN18), the Active Travel Act (Wales – 2013), NPTCBC Local Development Plan 2011-2026 (Adopted 2016), NPTCBC Supplementary Planning Guidance – SP20 Parking Standards, as well as considering previous experience of other similar sites.
- 1.2.3 As such, the TS has been structured to include the following:
 - A description of the existing conditions including, site location and use, access, planning context, car parking and existing travel behaviour in the surrounding area
 - Review of relevant planning policies, in particular in relation to sustainable travel and parking
 - Review of the connectivity of the site by sustainable modes
 - Description of the development proposals, demonstrating safe and appropriate access by all modes, cycle parking, and servicing and delivery arrangements

2. EXISTING CONDITIONS

2.1 Site Location, Use and Access

- 2.1.1 The site is located within Neath Town Centre to the north of Wind Street and south of High Street.
- 2.1.2 The site accommodates a social club, with a bar, games room, lounge concert hall and skittle alley at ground level, along with a small service yard at the rear of the site.
- 2.1.3 The site has an existing vehicular access from High Street on its northern boundary which enables two cars or service vehicles to wait off the highway. A car park is provided on the eastern boundary of the site, but this does not form part of this application.
- 2.1.4 The High Street access, as well as an access from Wind Street can accommodate pedestrians.
- 2.1.5 As such, the existing site use would generate movements onto the surrounding network, including by vehicles associated with customers, employees, servicing and deliveries.
- 2.1.6 The indicative location of the site is shown in Figure 2-1.

Figure 2-1: Indicative Site Location



Source: Google Maps

2.2 Public Car Parking

2.2.1 There are a number of chargeable public car parks within close proximity to the site, which have been summarised in Table 2-1.

Table 2-1: Car parks within close proximity of the site

Car Park	Walking Distance from site (metres)	Number of Spaces
High Street Car Park	10	37
Neath MSCP	140	604
Rosser Street Car Park	260	33
Milland Road Long Stay Car Park	500	450
Total Spaces		1,124

2.2.2 There are a number of parking options within short walking distance of the site, with four car parks located within 500 metres providing a total of c.1,124 spaces. In particular, three car parks are situated 260 metres or less from the site providing 637 spaces.

2.2.3 There are also a significant number of electric vehicle chargeable stations provided in the adjacent Morrisons site located within 200m walk of the site and Tesco superstore located within c. 1.8km walk of the site, which can be utilised by customers, such as visitors to the site as part of a linked trip.

2.2.4 It is considered that there is a significant level of car parking available within the vicinity of the site which can accommodate potential vehicle demand (particularly visitors) associated with the proposals.

2.3 Local Highway Network

2.3.1 As the site is situated within the town centre, the highway network within the vicinity of the site is well maintained, lit and benefits from active frontages and natural surveillance.

2.3.2 High Street runs adjacent to the northern boundary of the site and is a one-way single carriageway road for westbound traffic from the B4434 to Old Market Street.

2.3.3 Wind Street runs adjacent to the southern boundary of the site and is a one-way single carriageway road for eastbound traffic from Old Market Street to the B4434.

2.3.4 Wind Street, Old Market Street and High Street form a loop road arrangement together with Castle Street connecting to the B4434. As such, there is no vehicular access to the core commercial area of the town centre. This will encourage potential future residents to walk to local services and facilities in the town centre or park in larger car parks nearby. It also reduces the level of vehicle movements on these streets from through traffic.

2.3.5 Parking restrictions are in place along High Street, Wind Street and Old Market Street. High Street has double yellow lines on both sides. Wind Street has double yellow lines on the northern side with parking bays along the south for use by taxi's only. Old Market Street and Castle Street are restricted on one side with double yellow lines and loading bays restricting stays to 30 minutes only for goods vehicles between 0800-1800 on the other.

2.3.6 Refuse collection would currently occur from on-street along High Street and Old Market Street for residential and commercial premises.

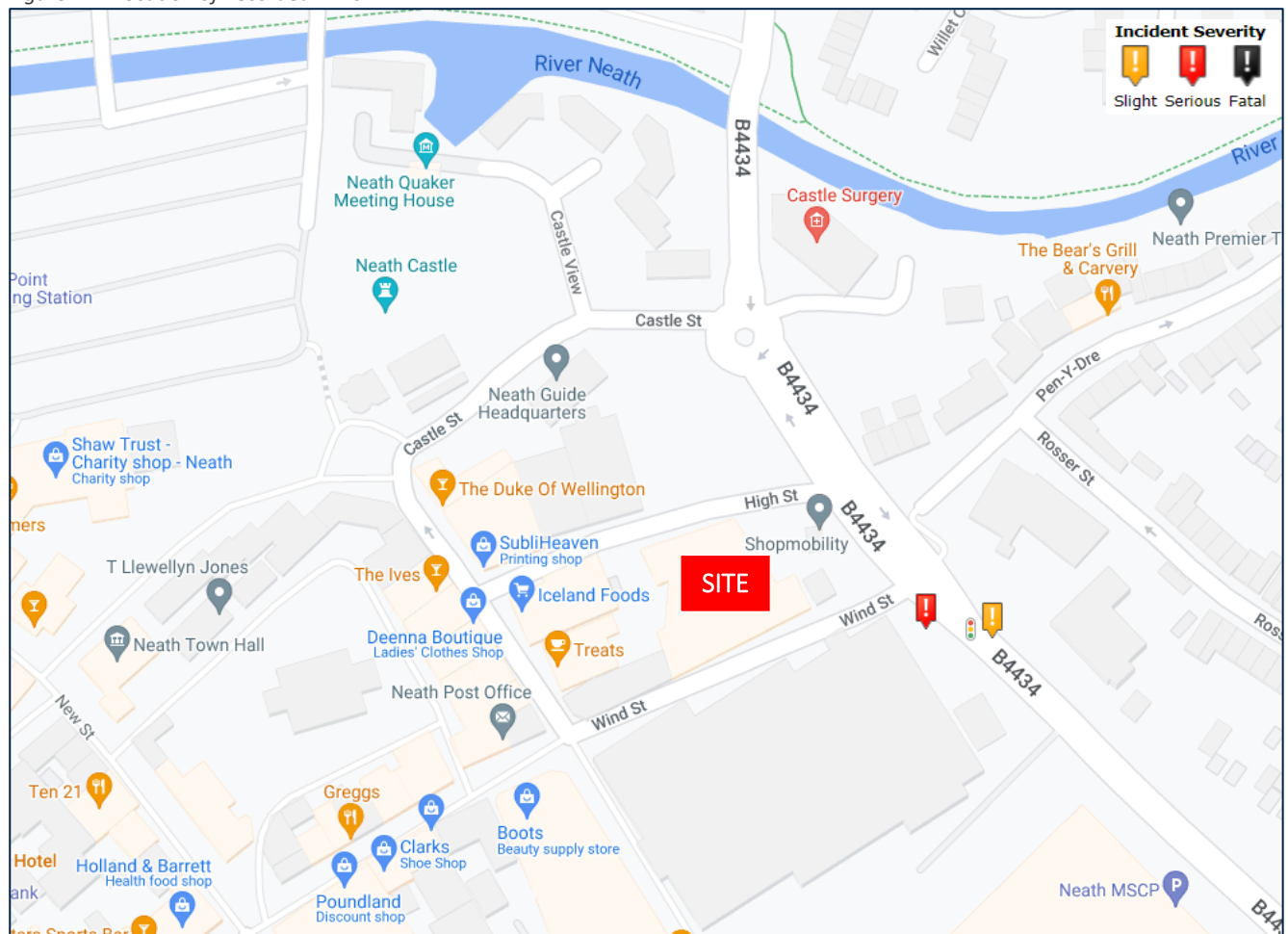
2.3.7 New Street and the adjacent streets further west are mainly pedestrianised which serve the town centre and connect to Orchard Street to the south.

2.3.8 The B4434 routes along the northern and eastern edge of the town centre within the vicinity of the site, providing vehicular access to the site via High Street and Wind Street, in addition to providing a connection to the A465 which links to the M4 Junction 43 to the south.

2.4 Road Safety

2.4.1 Personal Injury Accident (PIA) data has been obtained from road safety data published annually by the Department for Transport (DfT). The statistics provide PIA data which has been recorded using the STATS19 accident reporting form. The most recently available five year dataset, prior to the Covid-19 pandemic, covers between 1st January 2015 and 31st December 2019. Data is also available from 2020 and provisional data for the first 6 months of 2021. As such, all 6.5 years of data has been considered within this analysis. The study area considered within the analysis covers the local highway network within the vicinity of the site, with the entire study area shown in Figure 2-2.

Figure 2-2: Location of Recorded PIA's



Source: Crashmap

- 2.4.2 Over the five year period, there were two PIAs within the vicinity of the site. Neither of these occurred along the site frontage or along the key routes from the site into the town centre. Both incidents occurred within the vicinity of the Wind Street / B4434 junction.
- 2.4.3 One of the incidents was a serious injury accident which occurred between a pedestrian and a car. The other was a slight injury accident between two vehicles. No fatal accidents were recorded.
- 2.4.4 There were no incidents along Wind Street itself or Wind Street or within the vicinity of the existing servicing area.
- 2.4.5 There were no clusters of four or more PIAs occurring in the same location, therefore no evidence to suggest a re-occurring road safety issue.
- 2.4.6 As such, there is no evidence of an existing safety issue in relation to pedestrian or cyclist movements adjacent to the site, or in relation to servicing and loading associated with the site.
- 2.4.7 Although all incidents are regrettable, the PIAs that occurred do not indicate a specific pattern or issue with the geometry of the highway that would be exacerbated by the proposals.

2.5 Existing Travel Behaviour and Car Ownership

Modal Share

- 2.5.1 The site is located within output areas W00004992 and W00004994 in Neath Port Talbot. Table 2-2 shows how the existing residents of these areas currently travel to work, as well as a comparison with the entire of NPTCBC as obtained from 2011 Census data (via Nomis dataset QS701EW).

Table 2-2: Journey to Work Mode Split (Census 2011)

Mode	OA W00004992	OA W00004994	NPTCBC
Public Transport	6%	5%	5%
Car Driver	56%	60%	75%
Motorcycle	0%	2%	1%
Car Passenger	12%	10%	8%
Bicycle	0%	1%	1%
On Foot	26%	20%	9%
Other	0%	1%	1%
Total	100%	100%	100%

- 2.5.2 The census data shows that 56-60% of residents living in the surrounding area and commuting to work travel as a car driver, with 20-26% walking, 5-6% travelling by public transport, 10-12% as a car passenger and 0-1% cycling.
- 2.5.3 This is a significantly higher level of sustainable travel than across the entire of NPTCBC and demonstrates the highly sustainable location of the site and the options for residents to travel by sustainable modes, particularly walking. It is also noted that the output areas included some areas where residents have parking available, and as such would be significantly more likely to travel by car than for a site in the town centre with no parking.
- 2.5.4 These statistics have been adjusted to exclude working from home. If this was included, c.5-6% of residents currently in work, do so from home rather than commuting, with c. 3% doing this across NPTCBC. These levels are likely to have significantly increased since 2011. This demonstrates the further potential for constrain car use for movements to and from the site.
- 2.5.5 Travelling to work is only one journey purpose during peak hours from a residential site. A significant proportion of journeys will also be for education, leisure, and retail purposes and these are likely to have higher levels of sustainable travel, particularly given schools, retail and leisure opportunities are situated within suitable walking distances via appropriate routes (as shown in Section 3).

Car Ownership

- 2.5.6 The 2011 Census data has been reviewed for the average car ownership in the area in output area W00004992 within which the site is situated (using Nomis dataset QS416EW). This is considered slightly more applicable as a comparison with the site location. As it covers more of the town centre area and less of the streets to the north of the B4434. This shows an average of 0.5 cars per household in the output area and that 92% of households own one car or less (64% of residents do not own a car). This compares within an average of 1.1 cars per household across NPTCBC and 69% owning one car or less.
- 2.5.7 Based on this data, it is considered that the significant majority of potential future residents would be likely not to own a car and sustainable modes would provide realistic and attractive alternatives and are currently being used by existing residents in the surrounding area.

3. PLANNING POLICY

3.1 Future Wales: The National Plan 2040

- 3.1.1 This is the national development framework, setting the direction for development in Wales to 2040. It provides an overarching development plan with a strategy for addressing key national priorities through the planning system. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.
- 3.1.2 In relation to transport, it is states on page 51 that *"Growth should be shaped around sustainable forms of transport and places that make us and the environment healthier"*. Page 55 continues on to state that *"Development will focus on active travel and public transport, allied with a reduced reliance on private vehicles"*.
- 3.1.3 In the supporting text for Policy 2 - Shaping Urban Growth and Regeneration – Strategic Placemaking, it is stated that *"To enable active and healthy lives, people should be able to easily walk to local facilities and public transport."*
- 3.1.4 Policy 11 sets out National Connectivity, this states that *"Our priorities are to encourage longer distance trips to be made by public transport."*
- 3.1.5 Policy 12 sets out Regional Connectivity. This states that *"in urban areas our priorities are improving and integrating active travel and public transport."*
- 3.1.6 In relation to Active Travel and developments it is stated that *"Active travel must be an essential and integral component of all new developments, large and small."*
- 3.1.7 In relation to travelling in Wales, on page 84 it is stated that *"The Welsh Government's aim is to reduce the need to travel, particularly by private vehicles, and support a modal shift to walking, cycling and public transport."*
- 3.1.8 On page 174, supporting Policy 36, it is stated that *"Welsh Government wishes to see development built in sustainable locations that are supported by the active travel and public transport infrastructure and services needed to enable people to live active and healthy lives."*
- 3.1.9 As such, the key themes are that development should be sited where it can benefit from active travel and public transport connections and reduce the need to travel by car. Facilities should be within easy walking distance.
- 3.1.10 The site is situated in a town centre location within a short walking distance to key facilities, education and employment areas. Existing active travel connections connect to the site which encourages walking and cycling for local journeys. The site is also excellently situated to benefit from public transport services.
- 3.1.11 The site location is consistent with the policies and aims of Future Wales and is fully in accordance with the Welsh Government aspirations for where development should be focused. Full details of the sustainable connectivity are set out within Section 4.

3.2 Planning Policy Wales 11th Edition (PPW11)

- 3.2.1 PPW11 provides overarching Welsh Government policies with transport policies set out in Section 4.1. This states in paragraph 4.1.10 *"The planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:*

** are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car*

** make it possible for all short journeys within and beyond the development to be easily made by walking and cycling."*

3.2.2 PPW11 sets out a "Sustainable Transport Hierarchy for Planning" in Figure 9. This states in paragraph 4.1.12 "It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles."

3.2.3 It continues to state that "The sustainable transport hierarchy should be used to reduce the need to travel [and] prevent car-dependent developments in unsustainable locations."

3.2.4 PPW11 also states in paragraph 3.39 that development should "where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys."

3.2.5 The site is situated in a location which is highly accessible by walking, cycling and public transport, with active travel links to numerous key facilities and services, which is fully compliant with PPW11, as demonstrated in Section 4 of this TS.

3.3 Technical Advice Note 18: Transport (TAN18)

3.3.1 The importance of walking and cycling in contributing towards sustainable travel patterns is detailed in the guidance contained within TAN18: Transport (March 2007). The guidance emphasises not only the role walking and cycling can have as main modes of transport for local journeys but also the considerable contribution they play in forming parts of longer journeys by public transport.

3.3.2 The importance of the location of a site in relation to encouraging sustainable travel is set out within paragraph 3.3 which states "The location of new residential development has a significant influence on travel patterns as the majority of trips start or finish at home... It should be a key aim of development plans to identify residential sites that are accessible to jobs, shops and services by modes other than the car".

3.3.3 Paragraph 3.8 continues on to state that "Locations that are highly accessible by a variety of travel modes offer significant opportunities to make travel patterns more sustainable."

3.3.4 As such it is recognised by TAN18 that the sustainable location of a site, such as the application site, has a significant influence in engraining sustainable travel habits.

3.4 Neath Port Talbot CBC Local Development Plan (LDP) (2011-2026)

3.4.1 Section 5.4 relates to Transport and Access. Strategic Policy SP20 'Transport Network' includes the following measures to develop safe, efficient and sustainable infrastructure:

- Promoting connectivity and access to public transport through improving bus and rail facilities;
- Supporting enhancements to the walking and cycling network;
- Restricting development which would have an unacceptable impact on highway safety;
- Requiring development proposals to be designed to provide safe and efficient access and promote sustainable transport;
- Requiring appropriate parking provision

- 3.4.2 Policy TR2 'Design and Access of New Development' states that Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:
- The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;
 - 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;
 - The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;
 - Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.
- 3.4.3 Policy TR2 goes on to state that *"New development will be required to demonstrate that it will have no adverse effect on the existing highway network and traffic or congestion will not be increased to unacceptable levels"* and *"In the interests of creating more sustainable communities new development proposals should be accessible by a variety of means, not just the private car"*.
- 3.4.4 The site's location provides realistic and attractive opportunities for future residents to travel by sustainable modes and as such minimise the impact on the highway network, as set out in Section 4.

4. SUSTAINABLE CONNECTIVITY

4.1 Introduction

- 4.1.1 This section describes the opportunities to make everyday trips by non-car modes. It considers the likelihood of trips being made on foot, by cycle, bus and rail. The site location is demonstrated to be consistent with the aims of TAN18 and in accordance with sustainable transport policies in Future Wales, PPW11 and the LDP.

4.2 Walking and Cycling

- 4.2.1 At the top of the PPW11 hierarchy is the consideration of active travel (walking and cycling).

Walking

- 4.2.2 The site is situated within Neath Town Centre, in an area which currently accommodates significant levels of pedestrian movements. As such, all surrounding streets have good quality footways and appropriate crossing facilities to accommodate these movements safely between the surrounding retail and leisure facilities, visitor attractions, car parks and public transport hubs. This would be expected for an existing site situated in a town centre accessed by routes which already accommodate high levels of walking.
- 4.2.3 Footways are provided along both sides of both High Street and Wind Street, which front the site to the north and south, connecting the site to the pedestrianised Town Centre area to the west. Footway crossovers and dropped kerbs are provided to ease crossing.
- 4.2.4 New Street, Angel Street, Green Street and Queen Street are wide pedestrianised streets located within proximity to the site and provide high quality routes. These streets provide a connection to Neath bus and rail stations via Orchard Street to the south and Windsor Street to the west.
- 4.2.5 There is also a signal controlled crossing located on the B4434 to the east of the site, which enables crossing from the site to areas to the east. Dropped kerb crossings are also available at the Castle Street, B4434 mini roundabout to ease crossing with this forming part of a route to the nearest doctors surgery and pharmacy.
- 4.2.6 Dropped kerb crossings are also provided at the Gnoll Park Road / B4434 roundabout to the east which ease crossing to facilities such as Neath Rugby Stadium, Cricket Club and Leisure Centre.
- 4.2.7 The existing pedestrian infrastructure provides continuous and high-quality pedestrian links to the town centre retail areas, bus stops, the railway stations as well as a wide range of facilities. Walking therefore offers an extremely attractive choice of travel mode for users of the site, including as part of a linked trip by bus or rail.

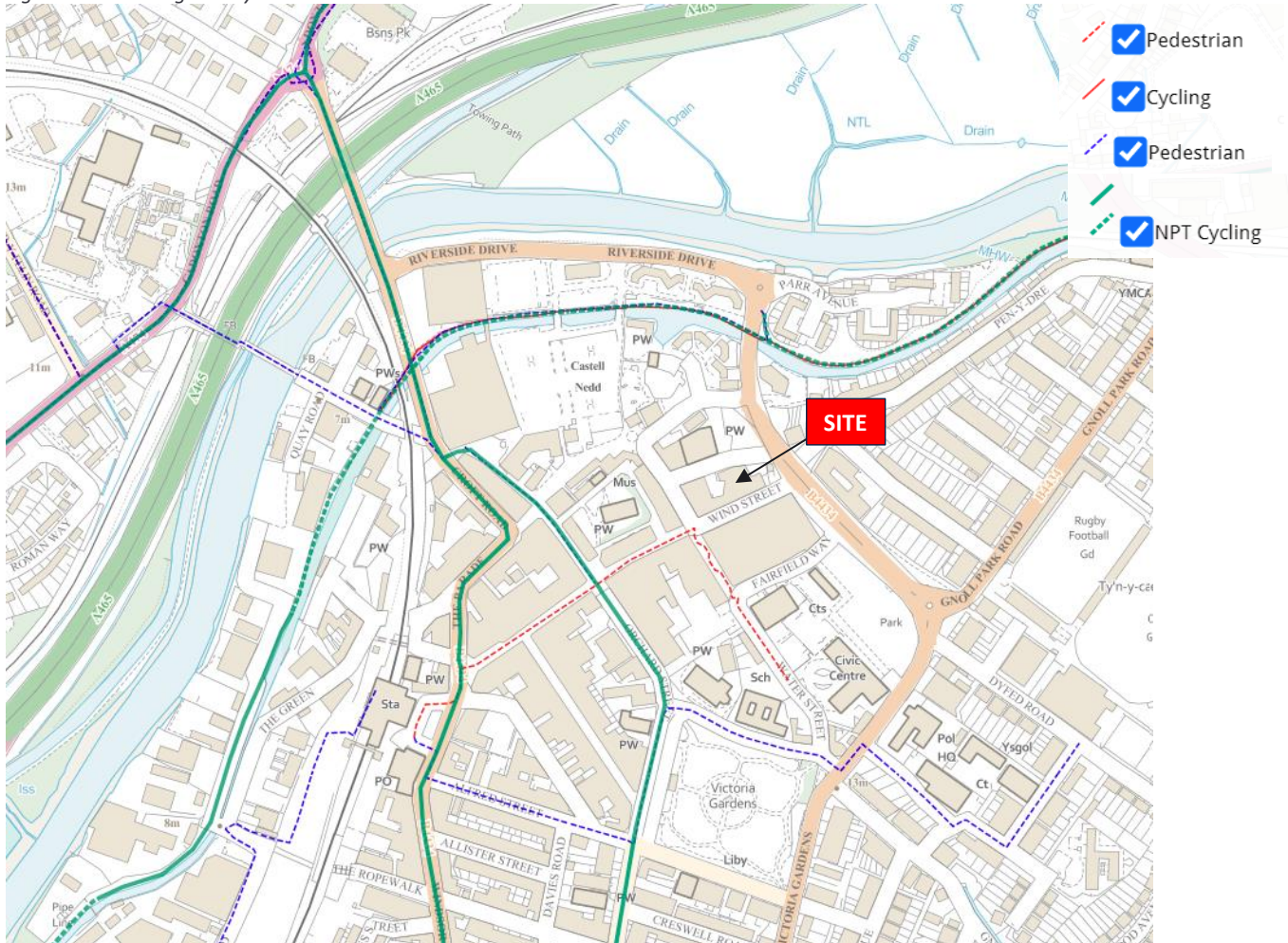
Cycling

- 4.2.8 The site is located in close proximity to New Street, which forms part of a wider pedestrianised area where cycling is permitted. These streets offer convenient routes within the town centre to access all nearby facilities. Cycle parking is provided at key locations around the town centre, to encourage travel by this mode.
- 4.2.9 To the north of the site, there is a key traffic free cycleway which routes along the side of the River Neath providing a high quality cycle route which loops around the edge of the town centre. In addition, the roads surrounding the site provide a relatively flat gradient and are considered safe for

cycling, based on the evidence in the road safety data and due to the low speeds on the immediate surrounding streets.

4.2.10 The cycle routes surrounding the site are shown on Figure 4-1.

Figure 4-1: Walking and Cycle Network



Source: NPTCBC

Summary

4.2.11 The site is situated in a highly sustainable location for active travel, as would be expected for a site in a town centre. This will encourage walking and cycling and reduce the need to own a car, consistent with relevant policy and guidance, including sustainable transport policies in Future Wales, PPW11 and TAN18.

4.3 Distance to Facilities

4.3.1 There are a number of publications which suggest guidance for appropriate and acceptable walking and cycling distances to facilities. For reference, these have been summarised as follows.

- Welsh Government - Active Travel (Wales) Act 2013: Within the ATADG it is stated within paragraph 4.1.4 that “walking as a mode of travel predominates for journeys of less than two miles whilst cycling is more convenient for longer journeys, typically of up to five miles for regular journeys”. This equates to distances for walking of up to 3.2km and cycling of up to 8km.

- Department for Transport (DfT) – Manual for Streets (2007): MfS states that ‘walkable neighbourhoods’ are typically characterised by having a range of facilities within 10 minutes walking distance (c. 800 metres). MfS also acknowledges that this is not an upper limit and references previous planning policy guidance in that it is generally acknowledged that walking offers the greatest potential to replace short car trips, particularly under 2km.
- CIHT (2015) – Planning for Walking: In relation to shorter trips in particular, (section 2.1) states that across Britain about ‘80% of journeys shorter than 1 mile (1.6km) are made wholly on foot’.
- CIHT - Guidelines for Providing for Journeys on Foot (2000): suggests preferred maximum distances for commuting journeys are up to 2km.
- DfT – LTN1/20 Cycle Infrastructure Design (paragraph 2.2.2) – states that “Two out of every three personal trips are less than five miles in length, an achievable distance to cycle for most people” (c.8km).

4.3.2 As such, based on guidance, it is considered that suitable walking distances are up to 3.2km but journeys within 2km have a greater potential to be made on foot. A 2km distance equates to around a 25-minute walk travelling at 3mph (4.8kph). A 3.2km distance equates to around a 40-minute walk. Sites with a range of facilities within 800 metres are considered to be within a ‘walkable neighbourhood’ and would be highly sustainable locations.

4.3.3 It is considered that journeys of up to 8km are within a suitable cycling distance. A cycling journey of 8km would equate to approximately a 25-minute travel time.

4.3.4 To demonstrate the site’s connectivity, nearby key facilities within appropriate distances which are accessed via suitable and established routes have been summarised in Table 4-1. The location of the facilities in the context of the site are shown in Figure 4-2. These facilities have been summarised based on approximate travel distances from the site access via appropriate routes, not straight-line distances.

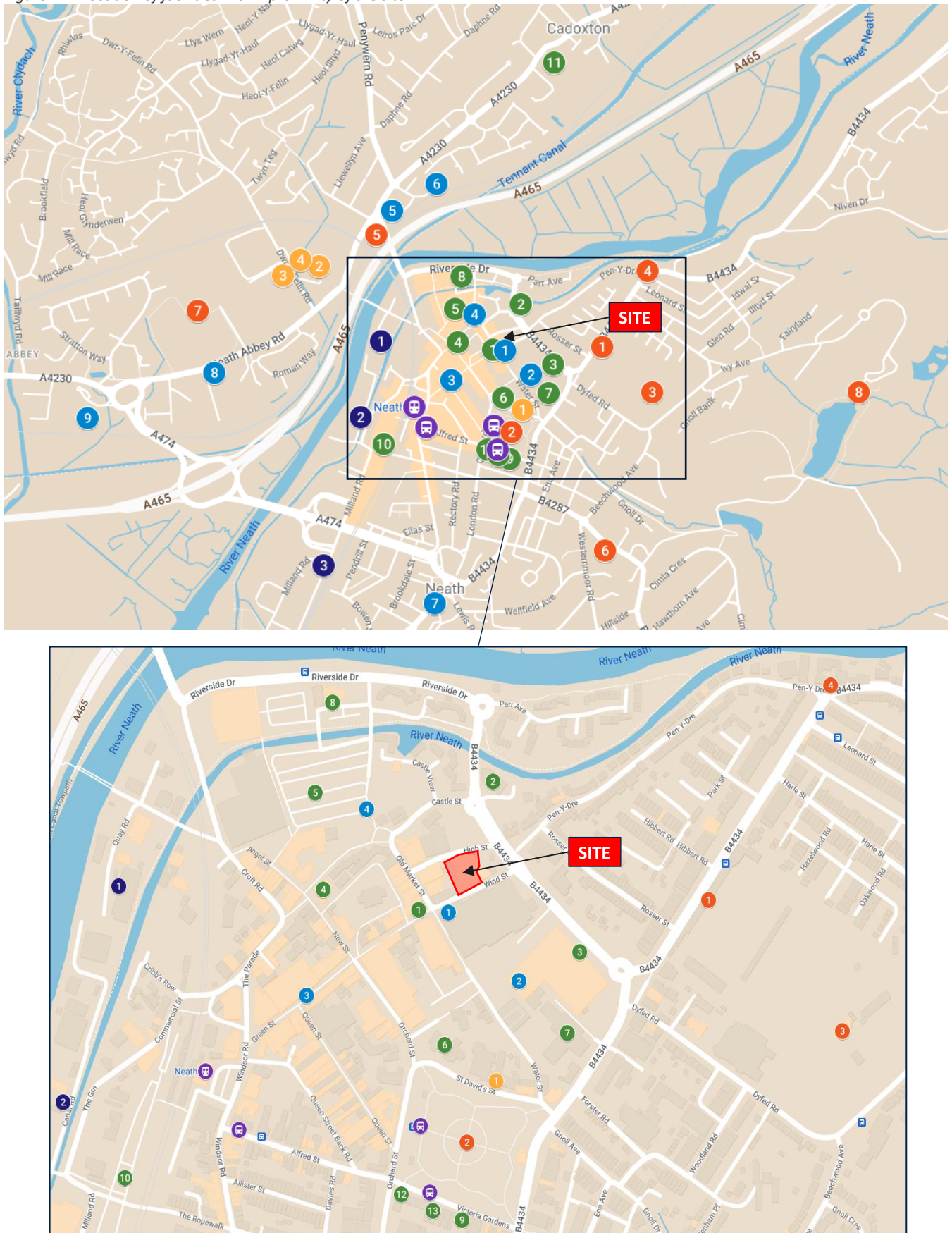
Table 4-1: Proximity of the site to local facilities and services

Facility / Amenity		Distance from site (metres)	Walking Travel Time (minutes) *	Cycling Travel Time (minutes) *
Community Facilities				
1	Post Office	50	8	2
2	Castle Surgery	160	2	1
3	Neath MSCP	160	2	1
4	Neath Town Hall	300	4	1
5	GeniePoint Charging Station	350	4	1
6	St David's Church, Neath	350	4	1
7	Neath Port Talbot County Borough Council	350	4	1
8	Morrisons Petrol Station	400	5	1
9	Victoria Gardens Surgery	450	6	1
10	Neath Library	500	6	2
11	Bupa Dental Care Neath	550	7	2
12	Milland Rd Car park	600	8	2
13	St Catwg's Church	1500	19	5
Public Transport				
🚌	Neath Bus Station	320	4	1
🚆	Neath Train Station	380	5	1
🚌	The Big Cam Bus Stop	550	7	2
🚌	Library Bus Stop	550	7	2
Retail				
1	Iceland Food Store	20	1	1
2	Wilko's	170	2	1
3	Neath Town Centre (core commercial centre)	260	3	1
4	Morrisons	200	4	1

Facility / Amenity		Distance from site (metres)	Walking Travel Time (minutes) *	Cycling Travel Time (minutes) *
5	Halfords	850	11	3
6	Lidl	1000	13	3
7	Highstreet (Briton Ferry Rd)	1000	13	3
8	Aldi	1200	15	4
9	Tesco Superstore	1800	23	6
Education				
1	Alderman Davies Primary School	400	5	1
2	Lilliput Day Nurseries	1000	13	3
3	Dŵr Y Felin Comprehensive School	1000	13	3
4	NPTC Group of Colleges - Neath College	1000	13	3
Leisure				
1	Neath Rugby Stadium	350	4	1
2	Victoria Gardens	550	7	2
3	Chopsticks Chinese Takeaway	550	7	2
4	Neath Cricket Club	650	8	2
5	Burger King	850	11	3
6	Brynhyfryd Bowling Club	950	12	3
7	Neath Sports Centre	1300	16	4
8	Gnoll Country Park	1700	21	5
Employment				
1	Industrial Units, Quay Road	650	8	2
2	Industrial Units, Canal Road	800	10	3
3	Milland Industrial Estate	1100	14	3

* Based on walking speeds of 80 metres per minute and Cycling Speeds of 320 metres per minute

Figure 4-2: Location of facilities within proximity of the site



Source: Google Maps

Note: Numbers and colours correlate to Table 4-1

- 4.3.5 Table 4-1 and Figure 4-2 demonstrate a large range and number of facilities and services are located within comfortable walking and cycling distances to the site which can be accessed via suitable active travel routes. This includes all of the town centre with the numerous facilities and services this offers.
- 4.3.6 All facilities are within Welsh Government guidance walking and cycling distances, with numerous facilities within a 'walkable neighbourhood' distance. This demonstrates the highly sustainable location of the site.
- 4.3.7 The proximity to this level and range of facilities will make walking and cycling the preferred choice of mode for the majority of everyday needs journeys and significantly reduce the reliance on the private car, supporting the car-free nature of the proposals. The reduction in car use and highly sustainable location is also consistent with relevant sustainable transport policies in Future Wales, PPW11, TAN18 and the LDP.

4.4 Public Transport

Bus

- 4.4.1 The closest bus stops to the site are located on Orchard Street at Neath Bus Station, located within a c.320 metre walk of the site. This operates as a dedicated bus station that accommodates the majority of bus services that operate in and around Neath.
- 4.4.2 The station comprises of 11 stopping bays that benefit from lighting, seating, shelter, timetable information, raised accessible kerbs and local area information.
- 4.4.3 Table 4-2 provides a summary of the key bus services operating from the Bus Station.

Table 4-2: Bus services operating from Neath Bus Station

No.	Route Summary	Frequency		
		Monday-Friday	Saturday	Sunday and Bank Holidays
X5	Neath to Swansea City Bus Station to via Briton Ferry	Hourly	Hourly	No Service
X7	Neath to Swansea City Bus Station via to Glynneath	Hourly	Hourly	No Service
X8	Neath to Banwen via Aberdulais and Seven Sisters.	Hourly	Hourly	No Service
34	Neath to Swansea City Bus Station via Skewen, Enterprise Park and Liberty Stadium	Every 15 minutes	Every 15 minutes	No Sunday Service
38	Neath to Swansea City Bus Station via Skewen, Coed Darcy, Jersey Marine & Fabian Way.	Hourly	Hourly	Hourly
56	Neath to Pontardawe via Bryncoch and Rhos	Hourly	Hourly	3 services
87	Neath to Port Talbot Bus Station and Margam via Baglan Energy Park and General Hospital.	Every 20 minutes	Every 20 minutes	Hourly
204	Neath to Caewathan	Every 30 minutes Between 09:00-17:30	Every 30 minutes Between 09:00-17:30	No Sunday Service
251	Neath to Ridgewood Gardens	Every hour Between 08:30-17:30	Every hour Between 08:30-17:30	No Sunday Service
202	Neath to Port Talbot	Every hour Between 09:00-18:00	Every hour Between 09:00-18:00	No Sunday Service
252	Neath Circular	Every 30 minutes Between 08:30 - 17:40	Every hour Between 09:00-17:10	No Sunday Service
256	Neath to Pontardawe	Every hour Between 07:45 – 16:50	Every hour Between 08:50 – 16:50	No Sunday Service

No.	Route Summary	Frequency		
		Monday-Friday	Saturday	Sunday and Bank Holidays
903	Abercrave to Neath Port Talbot College (Neath Campus) via Pontardawe	1 Out and 1 Return Journey per day	No Saturday service	No Sunday Service
906	Min yr Awel to Neath Port Talbot College (Neath Campus) via Glynneath, Abergarwed and Aberdulais	1 Out and 1 Return Journey per day	No Saturday service	No Sunday Service
908	Croeserw to Neath Port Talbot College (Neath Campus) via Cymmer, Pontrhydyfen	1 Out and 1 Return Journey per day	No Saturday service	No Sunday Service

Source: Traveline Cymru

4.4.4 There are a significant number of bus services which operate within close proximity of the site which serve a wide range of locations, including national express services which link to regional and national destinations.

4.4.5 Given the extent and proximity of numerous bus routes, the site has excellent accessibility by bus which offers an attractive travel option for potential future residents of the site. This will assist in minimising the vehicle trip generation from the site and reduce the need for residents to own a car.

Rail

4.4.6 Neath Railway Station is located within a 380 metre (c.5 minute) walking distance from the site and can be accessed via continuous and good quality walking routes. This station provides services to regional and national destinations, including Cardiff, Swansea, Fishguard, Tenby, Milford Haven and London. Rail services from Neath would be an attractive option for residents travelling to and from the site.

4.4.7 It is feasible and attractive to use the rail services for commuting purposes although rail is also likely to be attractive for other journey purposes such as leisure, retail, or business journeys. A combined walk and rail journey has excellent potential for replacing car journeys and further reducing the requirement for owning or travelling by car.

4.5 Summary

4.5.1 The site is situated in a highly sustainable location. Potential future residents can walk or cycle to a significant number and range of facilities, services and employment uses within appropriate distances via good quality routes, reducing the need to own a car. In this regard, the site location is consistent with the sustainable transport policies in PPW11 (in particular paras 4.1.10 – 4.1.17).

4.5.2 The site also has excellent public transport links, which provide a suitable, attractive and realistic alternative to travelling by car. This will benefit and attract residents that would prefer to travel by public transport.

4.5.3 The site location will encourage and promote sustainable travel behaviour, be attractive to residents who do not own a car or have low car ownership and is fully in accordance with transport policies in TAN18, PPW11 and Future Wales.

5. DEVELOPMENT PROPOSALS

5.1 Overview

- 5.1.1 The proposals are for a residential redevelopment of the site for 37 apartments, comprising 31 one-bedroom units and 6 two-bedroom units, set out over four floors. These would all be affordable homes for social rent and would be provided without on-site car parking provision.
- 5.1.2 The proposed site layout is shown in Appendix B.

5.2 Access

- 5.2.1 The proposals will be accessed by pedestrians from Wind Street and High Street, as per the existing arrangements. Access for cyclists and delivery and servicing vehicles is obtained from High Street.
- 5.2.2 The main resident's entrance will be via a gated access obtained from an existing opening along the site boundary on High Street. This will serve a central access route internally within the building. Separate gated entrance/exits are provided to the northwest corner of the site from the rear of the service / loading bay and the southwest corner from Wind Street. These provide access to the communal garden area and a number of entrances into the building.
- 5.2.3 Access points are also provided directly onto High Street to access the 32 secured and covered cycle spaces located within the curtilage of the building.
- 5.2.4 Two additional minor pedestrian access points are also provided from High Street with a further four served from Wind Street. These link directly to individual ground floor units which are accessed directly from the street.
- 5.2.5 Delivery and servicing vehicles will be able to access the site from High Street using the existing delivery bay located within the northwest corner of the site, which has been slightly amended to suit the proposals. The bay will be marked out and signed accordingly for this purpose only. These movements already occur, with no evidence of an existing road safety issue and as such the arrangement is considered appropriate for the proposals.

5.3 Parking

Car Parking Provision

- 5.3.1 NPTCBC Supplementary Planning Guidance (SPG) (2016) – 'Parking Standards', sets out the maximum parking standards for new developments based on the zonal descriptions within the CSS Wales Parking Standards (2014). The zones range from Town Centre or City Centre Fringe (Zone 2) to Deep Rural (Zone 6). No areas within Neath Port Talbot have been defined as Zone 1 (City Core), as this zone requires the highest levels of accessibility similar to areas such as Cardiff.
- 5.3.2 With the site located in Neath Town Centre, it falls within parking Zone 2. The parking standards for residential houses and apartments within this Zone suggest a maximum provision of 1 space per bedroom. Visitor parking is required at 1 space per 5 units. Applied to the scheme, this would equate to a maximum requirement for 43 spaces for residents plus 7 spaces for visitors for the proposed 37 units.
- 5.3.3 Based on the highly sustainable location of the site, the low level of car ownership in the surrounding area, the high number of public parking spaces nearby, and to encourage sustainable travel in accordance with PPW11, this is considered an extremely high parking provision to apply to the site.

- 5.3.4 The proposals are for to provide no car parking on the site, which is similar to the adjacent 50 unit scheme which gained consent as part of the wider mixed-use regeneration development (App Ref: P2013/0863). The provision of no car parking on the site has been considered against national and local policy as follows.
- 5.3.5 NPTCBC's SPG allows for reductions to be applied to the parking standards based on a number of factors, including the sustainable location of the site and potential car ownership levels. Within paragraph 3.2.1 it states, *"flexibility within the standards allows local circumstances to be taken into account"* and a sustainability points calculation is provided in Appendix F of the SPG to apply a suitable reduction against the maximum standards.
- 5.3.6 Note 5 within the SPG also states *"For developments where clear evidence has been supplied that car ownership levels will be lower than average, a more flexible approach to numbers of parking spaces may be taken."*
- 5.3.7 A sustainability points calculation has been undertaken using the guidance within Appendix F of the SPG and based on the analysis presented in Section 3 of this report. The resultant calculations and sustainability points score for the site have been summarised in Table 5-1.

Table 5-1: Parking Sustainability Points Calculation

Sustainability Criteria	Maximum Walking Distance	Single Sustainability Points	Notes	Points
Local Facilities				
Local facilities include a food store over 1,000m2, post office, community medical practice, primary / secondary school etc.	200m	3	Castle surgery, post office, Morrisons Supermarket, Proposed adjacent mixed use retail (P2013/0863).	6
	400m	2		
	800m	1		
Access to two of these within the same walking distance will score single points, whereas access to more than two of these will double the points score.				
Public Transport				
Access to bus stop or railway station	300m	3	Neath Central Rail Station and Neath Bus Station	2
	400m	2		
	800m	1		
Cycle Routes				
Access to a cycle route	200m	1	NPT Cycling routes	1
Frequency of Public Transport				
Bus or rail service within 800m walking distance which operates consistently between 7am and 7 pm. Deduct one point for service which does not extend to these times.	5 minutes	3	Neath bus and rail station both located within 400m of the site. The combined bus and rail service operates with a frequency of 1 service at least every 3 minutes.	3
	20 minutes	2		
	30 minutes	1		
Total				12

- 5.3.8 As shown in Table 5-1 the site location scores 12 sustainability points which equates to an allowable reduction of up to 2 spaces per dwelling for a residential use. This would equate to a reduction of 74 spaces, and as such would be the equivalent of no parking being required on the site. The highly sustainable nature of the site is therefore considered appropriate for a scheme without on-site car parking provision, consistent with the approach accepted on the adjacent site.

- 5.3.9 In addition, in accordance with Note 5 of the residential parking standards, 2011 Census data for car ownership has also been reviewed for the surrounding area and this is set out in Section 2. This shows that in the immediate surrounding area there is a low level of car ownership, with 64% of residents not owning a car, and of those that do, 92% own one car or less. As such, this area is suited to developments with no or low parking provision, which would be typical of developments located in a town centre.
- 5.3.10 As set out in Section 4, there is a significant level of publicly available car parking within the vicinity of the site and within Neath Town Centre, with c.1,120 spaces located in car parks within 500m of the site. In addition, the sustainable location of the site offers visitors a realistic choice of sustainable travel modes including walking, cycling and public transport.
- 5.3.11 Future residents would be in an informed position prior to moving in and would be aware of the car parking provision and parking restrictions within the town centre and sustainable travel options available. The location would also attract residents who choose not to own a car and would prefer to travel by sustainable modes of travel.
- 5.3.12 Given that residents would be aware of the parking restrictions prior to moving in, the proposed parking provision is considered appropriate and would not lead to a material impact from overspill parking onto the surrounding highway network, particularly given the extensive parking restrictions surrounding the site.
- 5.3.13 Based on the sustainable location of the site and to encourage sustainable travel in accordance with PPW11 and NPTCBC policies, the parking position is considered appropriate, in line with the parking standards SPG and would not have a material impact on parking stress.
- 5.3.14 The parking is also considered to be in accordance with the Welsh Government overarching planning policy Future Wales: The National Plan 2040 which states on page 86 that *"Planning authorities should promote car-free and low car developments in accessible locations."*
- 5.3.15 The proposed parking provision, given the highly sustainable location, is fully in accordance with the aspirations and policies of the Welsh Government for encouraging active travel and public transport use.
- 5.3.16 As there is no on-site parking provision, the site will likely generate a minimal level of vehicle movements, which are also likely to be lower than the existing site use, and would not have a material impact on the operation of the highway network.

Cycle Parking

- 5.3.17 The NPTCBC SPG sets out the cycle parking standards in Appendix D. For residential apartments, there is a requirement for 1 stand per 5 bedrooms. The site has a total of 43 bedrooms and as such, this would equate to a minimum provision of 9 stands (or 18 spaces).
- 5.3.18 A total of 32 secure and covered cycle parking spaces are to be provided within the bike store located to the north of the site, which is accessible directly from High Street. This level of provision is well in excess of the standards and the secure and covered design of the bike store is in accordance with the design notes provided within the SPG.
- 5.3.19 This level of provision will assist in encouraging travel by sustainable modes, including for visitors, and reduce potential demand for car parking.

5.4 Servicing and Deliveries

- 5.4.1 Servicing would mainly relate to refuse collection which would be undertaken on-street from High Street, as per the existing arrangements for the site and the surrounding units and properties within the town centre. The refuse collection arrangements would remain unchanged from the existing arrangements, with vehicles stopping for a short period of time, once a week, as occurs across the network. Given this is not a through route for vehicles, it is considered that these arrangements would remain appropriate.
- 5.4.2 MfS states Building Regulations on refuse collection distances in that waste collection vehicles should be able to get within 25 metres of the storage points. The bin store is within a 5m of High Street and collection can therefore take place from kerbside. As such, the arrangements are in line with Building Regulations (and MfS) and considered safe and appropriate.
- 5.4.3 The existing delivery and servicing area will be maintained as part of the proposals to provide a dedicated bay for deliveries and servicing vehicles (except refuse vehicles) to serve the site from High Street. The delivery area will reduce in width slightly to accommodate the proposed building, although this does mean that the bins will be located within a bin store as opposed to within the delivery area, as currently occurs. As such, the impact on the useable space within the delivery area is minimal.
- 5.4.4 Swept path analysis has been undertaken which demonstrates the bay can accommodate vehicles of up to 8m in length, including panel vans and rigid box vans. This is included in Appendix C. These arrangements are considered appropriate to accommodate vehicles such as parcel deliveries, on-line shopping or maintenance vehicles which would typically be generated by a town centre residential scheme. Vehicles will reverse into the bay from High Street and drive back out in forward gear, as per the existing arrangement, which has occurred over an extended period without evidence of a recorded safety issue. As such, the proposed bay is considered appropriate as a delivery and servicing bay for the proposed scheme.

6. SUMMARY AND CONCLUSIONS

6.1 Summary

- 6.1.1 Apex Transport Planning Ltd ('Apex TP') has been commissioned by Castell Construction Ltd to produce this Transport Statement (TS) to support a proposed redevelopment of the Neath Working Men's Club site, for a residential scheme.
- 6.1.2 This TS provides an assessment of the sustainable connectivity and transport impacts of the proposed development and sets out details of the proposed parking and access arrangements. This TS has been produced to inform the local highway authority, NPTCBC, of the highways and transport implications of the proposals.
- 6.1.3 The proposals are for a redevelopment of the Neath Working Men's Club site for 37 residential units, comprising 31 one-bed and 6 two-bed apartments over four floors.
- 6.1.4 The site is situated in a highly sustainable location. Potential future residents can walk or cycle to a significant number and range of facilities, services and employment uses within appropriate distances via good quality routes, reducing the need to own or travel by a car.
- 6.1.5 The site also has excellent public transport links, which provide a suitable, attractive and realistic alternative to travelling by car. The site is located less than a five minute walk of Neath bus and rail stations, which provide a high number of services operating at regular frequencies. This level of public transport provides a realistic and attractive travel option for future residents. These attributes will benefit and attract residents that would prefer to travel by public transport.
- 6.1.6 There is no on-site provision for car parking, which is in accordance with the parking standards, allowing for flexibility for sustainable connectivity and likely car ownership, as well as being in line with other similar schemes which have been approved adjacent to the site. It is also consistent with policies in Future Wales for reducing car use and minimising car parking.
- 6.1.7 There are numerous public car parks which can accommodate visitor parking appropriately within the vicinity of the site, and offer visitors a short-term parking option, where needed, although visitors will also be able to access the site by a choice of sustainable modes.
- 6.1.8 The existing delivery and servicing bay is being maintained and slightly altered to accommodate the likely service movements expected for a residential site.
- 6.1.9 The site is providing a total of 32 cycle parking spaces which is well in excess of the standards. This will further encourage residents and visitors to travel by cycle.

6.2 Conclusions

- 6.2.1 The site location will encourage and promote sustainable travel behaviour, attract residents who choose not to own a car or have low car ownership and is fully in accordance with transport policies in Future Wales, PPW11, TAN18, NPTCBC LDP and 'Parking Standards' SPG.
- 6.2.2 Data does not indicate a road safety issue which would be exacerbated by the proposals. The development would not have an unacceptable impact on road safety and the delivery and servicing arrangements will remain safe and suitable for the proposed residential use.
- 6.2.3 Providing no on-site car parking position is considered appropriate, in line with the parking standards SPG allowing for flexibility and would not have a material impact on parking stress given the surrounding parking restrictions.

- 6.2.4 As there is no on-site parking provision, the site will likely generate a minimal level of vehicle movements, and would not have a material impact on the operation of the highway network.
- 6.2.5 The analysis presented within this TS allows the highway authority to provide a positive recommendation on the planning application.

Appendix A NPTCBC Pre-Application Comments



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad	16th May 2022
Direct line Rhif ffôn	01639 686002
Email Ebost	j.king2@npt.gov.uk
Contact Cyswllt	Jessica King
Your ref Eich cyf	
Our ref Ein cyf	Q2022/0032

Mr R Chichester
C2J Architects & Town Planners
Unit 1A
Compass Business Park
Ocean Way
Cardiff
CF24 5HL

BY EMAIL ONLY

Dear Sir,

Town and Country Planning Act 1990

Pre-App. Ref.: Q2022/0032
PROPOSAL: RESIDENTIAL DEVELOPMENT COMPRISING 37 APARTMENTS
WITH CYCLE STORAGE, REFUSE STORAGE AND COMMUNAL
AMENITY AREAS
LOCATION: Neath Working Mens Club Wind Street Neath SA11 3HA

I refer to your correspondence received on 17 February 2022, concerning the above and your request for pre-application advice. Having considered the nature of submission, I respond as follows.

Local Context and Constraints

The application site is Neath Men's Working Club, located between Wind Street and High Street within Neath Town Centre. The application site is located within settlement limits and adjoins the Conservation Area, however is located outside of it. The site is a two-storey building and is widely visible from High Street, Wind Street and Prince of Wales Drive.

To the south of the site, a mixed use development is under construction to provide a new leisure centre and gym, swimming pool, retail units and library. A car park is located to the east of the site and a buildings of local importance is located to the north.

Amgylchedd ac Adfywio

Ceri Morris Pennaeth Cynllunio a Gwarchod y Cyhoedd

Y Ceiau, Ffordd Brunel, Parc Ynni Baglan, Castell-nedd SA11 2GG

Ffôn 01639 686868

Environment and Regeneration

Ceri Morris Head of Planning and Public Protection

The Quays, Brunel Way, Baglan Energy Park, Neath SA11 2GG

Tel 01639 686868

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

The site boundary is next to the Flood Zone 2 and 3 of the new NRW TAN 15 maps, however is not located within the new flood zones or within the existing flood zones C2 or C1.

While the site is located outside of the High Risk Coal Area, land contamination has been triggered as a site constraint.

Please note that this information is based on our current records and is, as far as possible, accurate. Nevertheless, we reserve the right to advise you of any additional constraints that may be identified at the time of your application.

Relevant Planning History

From an examination of our records, the application site/ property has the following relevant planning history:

- P2006/1346 - Proposal: Extension Providing A Games Room And Function Suite.
Decision: Approved. Decision Date: 21-NOV-06
- P2009/0203 - Proposal: Single Storey Extension/Smoking Shelter To Lounge/Bar Area.
Decision: Approved. Decision Date: 18-SEP-09
- P2012/0863 - Proposal: First floor open side smoking shelter, and raised parapet walling to facilitate use of roof area, together with the enclosure of the external staircase.
Decision: Approved. Decision Date: 08-JAN-13

Relevant Planning Policies

In addition to national guidance contained within Planning Policy Wales, any application would be considered against the Policies within the Adopted Neath Port Talbot Local Development Plan, details of which are available on the Council's web site by visiting www.npt.gov.uk/ldp. The relevant policies would include:

Strategic Policies

- **Policy SP3** Sustainable Communities
- **Policy SP7** Housing Requirement
- **Policy SP8** Affordable Housing
- **Policy SP10** Open Space
- **Policy SP22** Welsh Language

Topic based Policies

- **Policy SC1** Settlement limits
- **Policy H1** Housing Sites
- **Policy AH1** Affordable Housing
- **Policy OS1** Open Space Provision
- **Policy EC4** Protection of Existing Employment Uses
- **Policy EN6** Important Biodiversity and Geodiversity Sites
- **Policy EN7** Important Natural Features
- **Policy TR2** Design and Access of New Development

- **Policy WL1** Development in Language Sensitive Areas
- **Policy BE1** Design

Supplementary Planning Guidance:

The following SPG is of relevance to this application: -

- Planning Obligations (October 2016)
- Parking Standards_(October 2016)
- Affordable Housing_(October 2016)
- Biodiversity and Geodiversity (May 2018)
- Open Space & Greenspace (July 2017)
- Renewable and Low Carbon Energy (July 2017)
- Design (July 2017)
- Development and the Welsh Language (July 2017)

All of the above SPG can be viewed on the [Council's website](#).

Analysis of Proposal

Principle of development

Policy SC1 States “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.”

The application site is located within settlement limits and therefore is considered acceptable in principle subject to compliance with the below policies and supplementary planning guidance.

Policy SC2 states “Any proposals which would result in the loss of an important existing community facility will only be permitted where it can be demonstrated that:

1. The facility is surplus to requirements; or
2. The existing use is no longer viable.”

Supporting text paragraph 3.0.21 expends to state that “for the purposes of this policy, any facility that serves a community purpose can be defined as a community facility, including community halls, libraries, local or village shops, public houses and places of worship. Where a facility performs (or has performed) an important or central function in the life of the local community, any change to a **non-community use will be resisted unless it can be demonstrated that the facility is no longer viable or needed by the community and the that there is no potential that the building can be used for an alternative or shared community use**”.

Furthermore, supporting text paragraph 3.0.22 says that “the type of evidence required will vary depending on the type of facility under construction, but may include details of why the building is no longer in use, what alternative provision there is locally, what other community options have been considered for the building and evidence to show that reasonable efforts have been made to market the facility for sale or lease for its existing use”.

In line with the policies above, should a full planning application be submitted supporting information to address and accord with Policy SC2 would be required in order to justify the principle of development. Due to the prominent location of the building within the town centre and its scale, should a full planning application be submitted it is considered reasonable that evidence relating to reasons of ceased use, local alternatives and marketing efforts accompany the application, in accordance with paragraph 3.0.22 is submitted.

Policy SP4 'Infrastructure' states that "developments will be expected to make efficient use of existing infrastructure and where required make adequate provision for new infrastructure, ensuring that there are no detrimental effects on the area and community. Where necessary, Planning Obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable".

Policy I1 'Infrastructure Requirements' furthers this and states that "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.

In relation to planning obligations triggered by the development. Affordable housing would be required, in accordance with Policy SP8 and AH1. Given the proposed development would be required to provide 9 dwellings as affordable housing. In accordance with the Council's 'Affordable Housing' Supplementary Planning Guidance (SPG) (2016)¹, all affordable housing should be delivered through the tenure neutral model; be transferred to a Registered Social Landlord at 40% of the market value; remain as affordable housing in perpetuity; should be pepper potted through the scheme; and should be externally indistinguishable from general market housing. It is noted that the scheme would be 100% affordable housing and therefore the obligation is considered to be met within this proposal.

In accordance with policy SP10 and OS1 and the Council's 'Open Space and Greenspace' SPG (2017), the proposed development would be required to provide 1,551sqm of open space or the financial equivalent of £55,524, which would facilitate outdoor sport, designated play space and allotments.

As noted within the applicants Planning Statement the site is located just outside of the Coastal corridor Regeneration Schemes for the Neath Town Centre Mixed Use Regeneration Scheme. However, while the site is not part of the Regeneration Scheme, Policies SP10 and R2 would be of particular relevant to the proposal.

The site lies within the Neath Town Centre Retail Centre (Policy R2) which indicates that proposals should enhance the vitality, viability and attractiveness of the centre by strengthening the layout, retail character and pedestrian flows of the centre and should maintain a vibrant and attractive shopping street frontage. Policy R2 states that;

1. Within the designated retail centres, uses that would enhance the vitality, viability and attractiveness of the centre, including uses in classes(16) A and D will be permitted where:

(a) The proposal integrates with and strengthens the layout, retail character and pedestrian flows of the centre; and

(b) Does not prejudice the effective use of upper floors; and

(c) Maintains a vibrant and attractive shopping street frontage.

¹ Available at: https://www.npt.gov.uk/media/7466/spg_affordable_housing_oct16.pdf

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

By introducing a solely residential use (including ground floor frontage) into the street, the current proposal does not appear to meet this requirement in which case it would be necessary to demonstrate that the proposal would comply with the criteria of point 2 of the policy. It is advised that the development incorporates retail or commercial uses at ground floor, particularly on the southern elevation fronting Wind Street.

Design and visual impact

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. Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;
2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;
3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;

4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;
5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;
6. It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);
7. It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;
8. It uses resources, including land and energy, as efficiently as possible through: (a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area; (b) The layout and form of the development does not preclude the reasonable use of other adjacent land; (c) Developing brownfield land in preference to greenfield land where possible; (d) Minimising building exposure while maximising solar gain.
9. Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;
10. The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.

The existing Neath Working Men's Club building is considered to be in a fair condition, visually, however it is not considered to be of any particular architectural merit. While the building is located next to the conservation area its demolition is not considered to detriment the locality. With the construction of a new leisure centre and retail units, the principle of a modern building is not considered to be out of keeping with the street-scene or wider locality.

The proposed scale of the building is considered to utilise the site and while the introduction of a third and fourth floor element would increase the height of the development when compared to the existing building the break up in levels is not considered to be unsympathetic to the street context.

The eastern elevation of the building is highly visible from the road however it is a very blank elevation within the proposal. Although the agent has noted that the reason for the blank elevation is to accommodate the ability for a phase two development within the further. However, the current proposal assessed related to the initial 37 units and therefore consideration or reduced design standards cannot be employed for the consideration of a phase two, within this pre-application. Overall, no significant concerns are raised in regard to the rest of the proposed design, however should a full planning application be submitted material sample should be submitted.

The application site is located on the opposite side of the road to an existing church that has been identified as a Building of Local Importance. Additionally, a number of properties along Old Market Road are Listed Buildings. Therefore should a planning application be submitted consideration would have to be given to these buildings to ensure the proposal enhances and preserves the character and appearance of buildings and their settings.

Highways, waste and biodiversity

The proposal does not provide any on-site parking for the 37 residential units however the provision of active travel has been provided with a bike store area located on the ground floor. Due to the size of the proposed units and the location of the site within the Town Centre, the lack of parking is not considered to detriment the acceptability of the scheme, however concerns have been identified by the Council's Highway department as the scheme would result in less parking provision than currently available on site. a transport statement should support a planning application submission.

The application site is located along two town centre streets with double yellow lines to the north and west. For this reason a maintenance / delivery bay would be necessary to accommodate deliveries and any maintenance vehicles required for the development .

As discussed within the pre-application meeting, further clarification would be required for waste and refuse collection. While it is noted that the proposal includes the provision of a fairly large bin store area the collection of waste from the forecourt to the west of the site is unclear. The forecourt appears to be part of Iceland and therefore there may be third party land ownership issues. Should a planning application be submitted a statement identifying how waste will be collected and managed will be required, with appropriate consideration given the Local Authorities collection ability.

The proposal appears to incorporate a green roof in order to facilitate SAB requirements. The green roof would also contribute to onsite biodiversity enhancement if designed appropriately. The provision of a green roof would be in accordance with PPW11 and the LDP and would contribute towards the sustainability of the development. The application should be supported with a strategy for the green roof to outline its design and management. As biodiversity enhancements are required as part of the development it is advised that the green roof incorporate such enhancements. The Councils Biodiversity section have advised that due to the height and location of the proposed development it is strongly suggested that enhancement is achieved by integrating swift nest boxes into the building.

Impact on neighbouring properties

The locality predominantly consists of commercial and retail units however there is one residential dwelling located to the west of the site at no.1 Old Market Road. due to the off-set of the proposed development from the boundary of no.1 Old Market Road, it is not considered to result in an overbearing impact for the neighbour. Should a full planning application be submitted the impact on the neighbour will be assessed to ensure no loss of privacy or acceptable harm to their residential amenity.

You are encouraged to contact Natural Resources Wales (NRW) to seek further pre-application advice. While the site is not located within a flood zone, it is noted that the site does boundary the new flood zone 3 and 2. It is advised that you contact NRW to determine whether they would require any flood assessment documents within a planning application submission.

You are encouraged to contact Dŵr Cymru Welsh Water (DCWW) to seek further pre-application advice.

Sustainable Drainage – Statutory Requirements w.e.f January 2019

Please note that all new developments of more than 1 house or where the construction area is of 100m² or more will require sustainable drainage - built in accordance with mandatory standards for sustainable drainage published by Welsh Ministers - to manage on-site surface water. More information is available in [Schedule 3 of the Flood & Water Management Act 2010](#).

These systems must be approved by the Council's Engineering Service acting in its SuDS Approving Body (SAB) role **before construction work begins**. In this respect it is essential that a developer of any such project gain SAB approval of its surface water drainage alongside any relevant planning permission. **You will not be allowed to start construction until both permissions have been approved.**

If you have not done so already, and your development would not fall into any of the relevant exceptions², you are therefore strongly encouraged to request further advice from the SAB. Involving the SAB Officers in pre-application discussions will allow for SuDS drainage matters (to ensure suitability of proposed SuDS design in line with national standards and adequate site layout) to be considered alongside the assessment of planning merits. **There is an additional charge of £250 for this service.** This can be as part of any agreed further pre-application submissions with the Planning Authority (recommended) or independently/ direct with the SAB. You are advised, however, that failing to engage in joint pre-application discussions has the potential to lead to delays and, most notably, the potential need to obtain further planning permission should any agreed SuDS design not be compliant with any relevant planning permission. Further details are available at www.npt.gov.uk/planning.

Major Developments

Please be aware that as a 'major' development there is now a statutory requirement (introduced by s17 of the Planning (Wales) Act 2015) for the applicant / developer to consult the community and relevant statutory consultees in advance of formal submission of an application.

Please note that a major application cannot be validated until such consultation is undertaken and a Pre-Application Consultation (PAC) Report submitted with the application.

Best practice guidance for developers on Pre-application Community Consultation can be found on the [Welsh Government website](#).

Section 106 Planning Obligations

The Council's approved [Planning Obligations Supplementary Planning Guidance](#) (SPG) provides the local policy basis for seeking planning obligations through Section 106 Agreements in Neath

² Exceptions and exemptions, in summary, relate to:-

- Existing sites and developments with planning permission granted or deemed to be granted (whether or not subject to any conditions as to a reserved matter) or for which a valid application has been received but not determined by 7 January 2019. However, SAB approval will still be required if the planning permission was granted subject to a condition as to a reserved matter and an application for approval of the reserved matter is not made before 7 January 2020.

Port Talbot. The Council's approved SPG is also available to view/ download at www.npt.gov.uk/planning.

Following consideration of the proposed development and potential impacts and needs arising from the development, I would advise that the Council is likely to seek planning obligations covering the following: -

- Affordable Housing
- Biodiversity
- Public Open Space

Viability

Where a developer/applicant indicates that they may be unable to provide the full affordable housing requirement or other planning obligations on viability grounds, they will need to submit a detailed financial assessment of the proposed development using the Council's Development Viability Model (DVM). For more information, please visit our [Viability Assessments for Planning Applications](http://www.npt.gov.uk/media/16366/section-106-obligations-viability-assessment-procedure-note-and-guidance-note.pdf) page and/or read the Council's Viability Assessment Procedure Note: <https://www.npt.gov.uk/media/16366/section-106-obligations-viability-assessment-procedure-note-and-guidance-note.pdf>.

Before submitting an application, and as part of any further pre-application discussions (which may require further charges), the Planning Officer will discuss the Council's expectations, and offer you the opportunity for a completed viability assessment to be submitted and reviewed prior to the planning application (subject to payment of the relevant charges outlined on the Council's website at <https://www.npt.gov.uk/30472>). Alternatively this can be at application stage, though we would always recommend initiating discussions at pre-application stage.

Required Supporting Documentation

We would encourage you to submit your application electronically via www.gov.wales/planningapplications.

Having regard to the nature of your proposal, it is considered at this stage that in addition to the submission of standard mandatory supporting documentation such as application forms, plans and fee, any application for the above development should also be accompanied by the following additional documentation: -

- Pre-Application Consultation (PAC) Report ('Major' development)
- Design and Access Statement (see TAN 12 Design, Appendix 1)
- Welsh Language Impact Assessment (see our [Development and the Welsh Language SPG](#) for guidance)
- Details of biodiversity enhancements
- Contaminated Land Desk-top Assessment
- Site survey identifying existing ground levels, plus details of proposed levels including sections / cross-sections
- Transport Assessment

If any subsequent application fails to include the information above, there is a chance it may not be registered and, in any event, it is likely that an application will either be refused or will not be able to be progressed until its satisfactory submission.

It is also this Authority's practice to recommend to applicants that detailed information is submitted at application stage to ensure that, in the event of planning permission being granted, that 'pre-commencement' conditions (which require approval of details prior to work starting on site) can be minimised. You are therefore encouraged to ensure that your initial submissions incorporate as much information as possible (for example materials, boundary treatment, ecology mitigation, Construction Management Plan, Travel Plan etc.), and address all matters raised in the advice given above.

Detailed guidance on the use of the national standard application form for planning permission and other associated consent regimes; and the information which must accompany a planning application so that the local planning authority can determine the validity of the application, can be found as follows: -

"Guidance on the use of the standard application form ('1app') and validation of applications":
<http://wales.gov.uk/topics/planning/policy/guidanceandleaflets/1appguidance>

The Town and Country Planning (Development Management Procedure)(Wales) Order 2012: http://www.legislation.gov.uk/wsi/2012/801/contents/made/original_order.
(Note subsequent Amendment Orders: [2014](#) ; [2015](#) ; [2016](#) ; and [2017](#)).

How we will deal with your planning application

As part of its emphasis on 'Delivering Quality Development Quickly', the Planning department prides itself on the service it offers our customers. Once your application has been received, this will include an allocated case officer making contact with you or your appointed agent within the first week and arranging a visit, following which we will contact you by phone or email to advise of any discrepancies with your application. We will also work with you to address any outstanding concerns, including any amendments required to make your proposal acceptable.

Once we are happy with the validity of your application, we will formally consult neighbours and relevant consultees. Provided there are no significant matters of concern resulting from such consultations, we will then seek to determine your application as swiftly as possible after the expiry of the statutory publicity period, and aim to do so within the 8 week statutory period.

While Officers will endeavour to ensure you are aware of the progress of your application, we would encourage you to contact the case officer should you wish to discuss any matter further.

Development Team Approach – Building Control

The Development Management and Building Control teams work closely to assist developers in improving the quality of their development and ensuring compliance with all appropriate conditions and Regulations. In particular, Building Control provide a competitive and highly professional service and seek to actively engage with developer's at the earliest stage of their project. You are therefore encouraged to contact the Building Control team on 01639 686820 or

by emailing building.control@npt.gov.uk to enter into early negotiations and understand the benefits of the Council's Development Team approach.

Requests for Further Advice

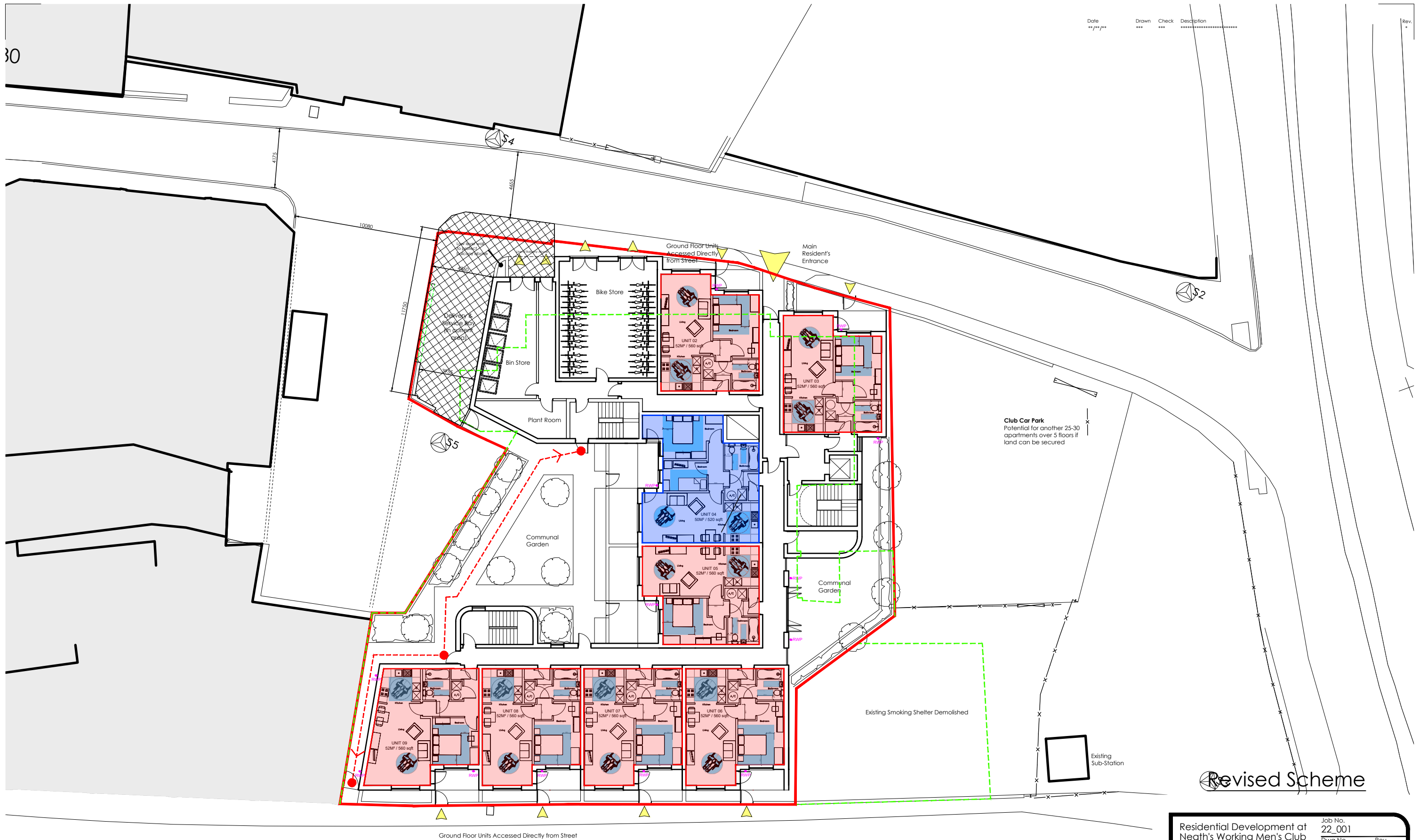
Following receipt of this initial advice, should you wish to discuss your scheme prior to formal submission, please contact the case officer on the direct number or email address given above. Further charges may apply.

Yours faithfully

Jessica King

If you require this information in larger print, or in an alternative format, please contact the above named officer.

Appendix B Site Layout Plan



Date	Drawn	Check	Description	Rev.
05/01/22	***	***	*****	*

Site Plan
1:250

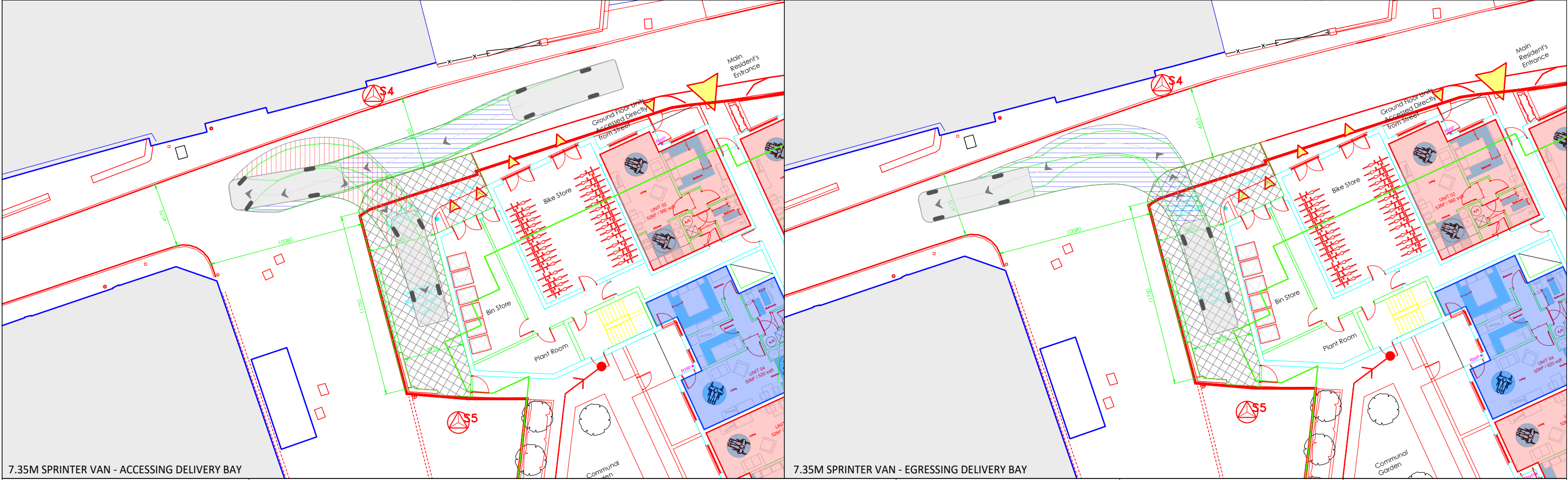
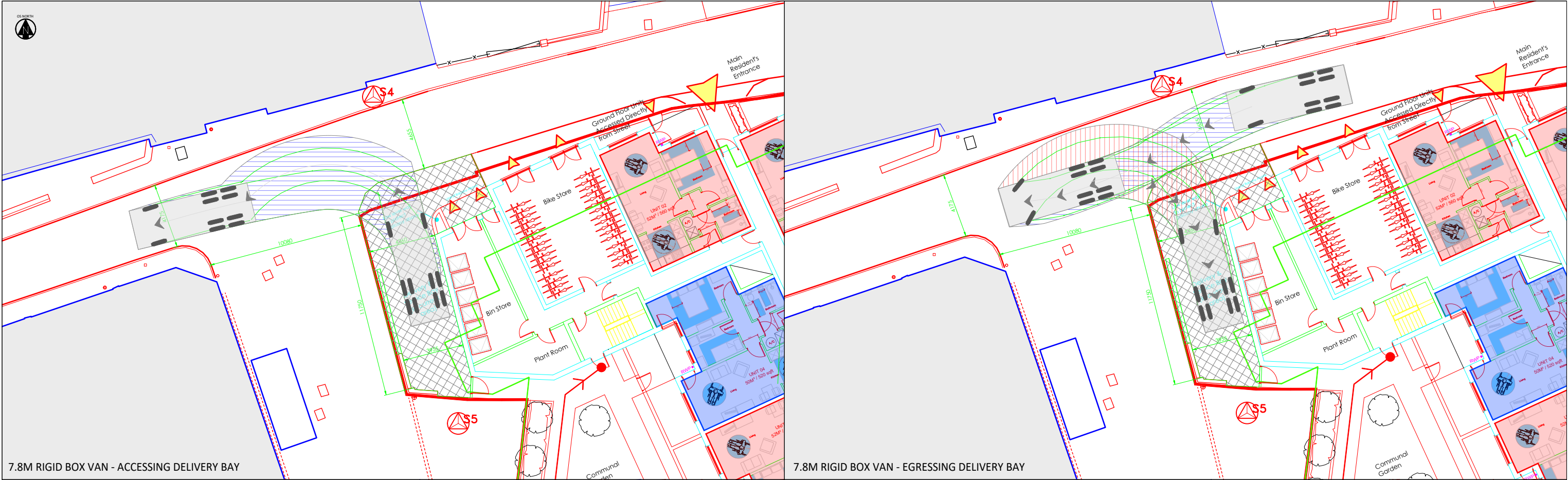
Residential Development at Neath's Working Men's Club Castell Group		Job No. 22_001	Rev.
Proposed Site Plan		Dwg No. AL(10)01	
Date 05/01/22	Drawn ***	Scale 1:250 @ A3	

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tel: 029 20452100

Appendix C Swept Path Analysis



SCALE BAR

0m 5m 10m

SCALE BAR (1:250)

KEY

7.80

1.40 4.50

BOX VAN

Width	: 2.55
Track	: 2.55
Lock to Lock Time	: 6.0
Steering Angle	: 38.5

7.35

1.00 4.33

2012 Mercedes Sprinter XL

Width	: 1.99
Track	: 1.95
Lock to Lock Time	: 6.0
Steering Angle	: 41.0

REVISIONS

PO1	15/06/22	First Issue.	SD	DC
Rev	Date	Description	By	App

Apex
TRANSPORT PLANNING

11-13 PENHILL ROAD
CARDIFF
CF11 9PQ

t: 02920 619 361
e: info@apexp.co.uk

CLIENT
CASTELL CONSTRUCTION LTD

PROJECT
NEATH WORKING MEN'S CLUB

TITLE
SWEPT PATH ANALYSIS OF DELIVERY BAY

LARGE 7.8M RIGID BOX VAN AND LARGE 7.3M SPRINTER VAN

PROJECT NO. C22-052	SCALE @ A3 1:250
STATUS DESCRIPTION INFORMATION	STATUS S2
DRAWING NO. C22052-ATP-DR-TP-001	