

Heritage Impact Assessment and Statement of Significance/Justification, for the:

**Repair, Re-ordering and ‘Change of Use’ of the Upper floors of
Commercial Buildings, set at the Junction of Talbot Road and
Beverley Street, Port Talbot.**



**Address of application site: Commercial Buildings, Beverley Street,
Port Talbot. Neath Port Talbot, SA13 1DR.**

Commercial Buildings, Junction of Beverley Street and Talbot Road, Port Talbot

Planning Consultant: Robert Bowen Planning and Development Ltd.

Historic Building Adviser: Trevor J. Francis MSc (Strathclyde), MRICS, MCIOB, MCABE, Dip. Architectural Conservation (Bristol). CIOB Certified Conservation Specialist (Building Surveying Practitioner). RICS Registered Valuer.

1.0 INTRODUCTION

This locally listed building contains a number of small retail units to the ground floor but the cellular office accommodation set at first and second floor levels, is unlet and run down. The cellular layout within a secondary location on the outskirts of Port Talbot Town-centre are of a form and condition, that is no longer suitable for medium or large office users or meets the needs of small/micro-businesses.

We suspect that the building has been known by different names over the years but little archival information currently appears to exist.

The current proposals to ensure a long-term sustainable use for the building are as shown on the **Complete CAD & Structural Solutions Limited** drawings which illustrate the application.

The intention to:

- (i) Convert the first and second floor offices into a number of residential apartments, which will provide this locally listed building with a sustainable use and an income stream that will facilitate further investment in the ongoing care of the building fabric and services, whilst providing good quality and affordable living accommodation for local residents.
- (ii) Enhancement of the ground floor entrance, internally.
- (iii) The existing ground floor retail units and part of the first and second floor accommodation levels are held as long leasehold interests by tenants and we gather that no changes are proposed in these areas. Whilst the applicant is the freeholder of the complete block, other than acting as managing agent, he has little jurisdiction over those with long leasehold interests in parts of the building.

Conservation is about the careful management of change; hence it is necessary to understand the implications of any proposed changes. Understanding the historic asset and its significance is fundamental to sound decision making. Once significance is established the

potential impact of any changes proposed can be evaluated and adapted where necessary to arrive at an appropriate solution.

The purpose of this Heritage Impact Assessment/Statement of Significance (HIASS) is to better inform parties, and in particular the owner and decision makers, so that they can make appropriate, informed decisions.

A Heritage Impact Assessment/Statement of Significance is a structured process to ensure that the significance of the historic asset is considered when developing and designing proposals for change. It should play a key part in the design process, and test whether the proposals for change are appropriate by assessing impact on the significance of the asset. It helps ensure that changes minimise harm and maximise benefits. The results of the heritage impact assessment are summarised within this heritage impact statement. This will give all parties the information they need to understand and reason the proposals, weighing risks and benefits.

This Heritage Impact Assessment/Statement of Significance (together with its directly associated annotated photographic plates) must be read together with the full planning application submission, Design and Access Statement and architectural drawings produced.

The existing façade will have maintenance repairs made but remain largely unchanged by the proposals. No irreversible damage and only enhancement of the interior fabric will arise by the current proposals which are to repair, conserve, refurbish, and create a viable and sustainable long term use with minimal structural interventions, removing simply alterations that have arisen in the and twentieth centuries that are no longer appropriate or viable. The work will be in accord with Building Regulatory requirements and the Housing Health and Safety Rating System (HHSR).

1.1 Objective

This Heritage Impact Assessment/Statement of Significance and Justification (HIASS) has been produced to support the application for Planning Consent. The construction and broad condition of the building is shown and documented in the associated 'Annotated Photographic Plates' that must be read as part of this HIA/SS document; as well as the application drawings. A Design and Access Statement, that illustrates the existing and proposed works will also be produced by Mr. Robert Bowen, of Robert Bowen Planning and Development Ltd.

Conservation is (as stated earlier) about the considered and careful management of change. (Welsh Government, PPW).

Cadw agree, stating: '*Conservation is about managing change*'.

We all must accept that buildings need to evolve to meet new demands. It is how this is accommodated, that is key. As a locally listed building, its reasons for retention are slightly different and discussed later.

2.0 Understanding the significance of the Historic Asset

2.1. Location and Context

Commercial Building's was we understand built circa 1924 and occupies a prominent site at the junction of Talbot Road and Beverley Street. Talbot Road has a number of relatively tall buildings and of these, Commercial Building's has one of the more attractive facades with its slate roof, faience details and brickwork. it is actually weathering far better than more recently constructed apartment blocks nearby but older faience has a finite life and some deterioration was noed especially around the entrance. Localised repointing and some minor maintenance patch repairs are recommended as well as cleaning using the Josh conservation system if practicable. This will enhance visually and highlight areas that may need sealing correctly. Faience is a very expensive product to replicate today successfully and some age and alteration decay/modification has to be accepted. There are many examples of repairs and paint techniques, being utilised instead, such as Waterstones in Swansea (The former Carlton Cinema) and the Electric Cinema, 191 Portobello Road, Knotting Hill, London..

The location is on a busy highway that connects Port Talbot with Taibach and Margam. It is reasonably accessible for local parks, schools and town centre facilities, as well as Margam steelworks and associated supporting industries.

In a time of greater prosperity, the area would have been popular and in demand, but today it is very much a secondary location that is largely residential with an aging building stock. Commercial building use is functionally and technically obsolete as office space. Over the past 30 to 40 years, it will always have struggled to obtain suitable robust tenants. In a post COVID Britain, there is little demand for small cellular office accommodation that lacks many of the facilities afforded by numerous competing premises.

Given that the building was in 2019, placed on a local buildings of interest list, the long-term sustainable future of this structure can only be as mixed secondary retail to the ground floor areas with residential units above. Change of use into residential apartments is critical if the building fabric is to be retained, cared for, and managed.

2.2 Locally Listed Building Description

The Historic Environment Supplementary Planning Guidance (Consultation Draft - January 2019) Appendix A: . Schedule of Buildings of Local Importance, Reference: POR014
Commercial Buildings Talbot Road Port Talbot.

This is supplementary planning guidance supporting the NPTCBC Local Development Plan and on

Page 29 of the document, states under Section 4.5 Buildings and Historic Assets of Local Importance:

Trevor J. Francis, MSc, MRICS, MCIOB, MCABE, Dip. Architectural Conservation (Bristol). CIOB Certified Conservation Specialist (Building Surveying Practitioner). RICS Registered Valuer.
Chartered Building Surveyor, Chartered Builder and Historic Building Consultant.

4.5.1 LDP Policy BE2 (refer to Section 3.2) 'seeks to give protection to Buildings of Local Importance (BLIs). BLIs are locally identified and designated buildings (and other historic assets) that may not meet the requirements to be included on the statutory list of buildings of architectural or historic importance or the schedule of monuments, but are considered to be important within the local context and therefore to be worthy of conservation.

4.5.2 This policy was incorporated into the LDP as a result of strong representations received from across Neath Port Talbot from those concerned that the character and distinctiveness of their communities was being compromised through the loss or spoiling of distinctive and characterful buildings and (in some cases) their replacement with bland modern developments.'

4.5.3 The buildings that have been identified for BLI designation are therefore not necessarily of national architectural or historical significance, but are considered to have strong associations with the locality and to give distinctive character to the community or settlement. The aim of the policy is to try to retain this local character. 4.5.4 Since the adoption of the LDP, Cadw has issued guidance on the compilation of local lists of buildings (using the term Historic Assets of Special Local Interest) (8). The compilation of the BLI list has been undertaken following the principles set out in this guidance and in accordance with the explanatory text to LDP Policy BE2 which states that an inventory of BLIs is to be compiled as part of the preparation of this Historic Environment SPG. 4.5.5 For the purposes of this guidance the term Building of Local Importance (BLI) should be taken to be the equivalent of and to incorporate the term Historic Asset of Special Local Interest. Schedule of Buildings of Local Importance Preparation and Engagement 4.5.6 The list of BLIs has been compiled in accordance with the procedure and criteria set out in Appendix C. The list has been subject to a consultation process with building owners which has resulted in some amendments (including some additional suggestions).

And on Page 53 under Appendix C, states that the Procedure for Identifying BLIs is to:

Exclude all: Listed Buildings Scheduled Monuments.

Examples of types of Building/Structure to be assessed as BLI's are:

Churches and Chapels Pubs Halls Libraries and other public buildings War memorials, statues, fountains etc. Traditional shops/shopfronts Industrial heritage, railway/tramway structures, canal structures etc. Distinctive/important examples of local building types and styles.

Qualifying Characteristics LDP Policy BE2 defines BLIs as '...buildings that are of local historic, architectural or cultural importance'. The supporting text for the policy states:

'Buildings may be significant for architectural reasons, giving character and sense of place to local centres and settlements, or may be of particular local historic or cultural importance'. Criteria for Selection(18) In order to qualify for designation as a BLI, a building has to meet at least three of the five selection criteria listed below. The criteria that the building is considered to meet are shown on the draft BLI schedule entry.

The selection criteria being:

- 1. Architectural Interest - Buildings and structures which are of importance to Neath Port Talbot for the interest of their architectural design, decoration and craftsmanship; also important examples of particular building types and techniques.*
- 2. Historic Interest - Buildings and structures which illustrate significant aspects of Neath Port Talbot's social, economic, cultural or military history.*
- 3. Historical or Cultural Association - Association with the community's important people or events or having had an important role in the cultural life or development of the community.*

The specific entry for Commercial Building's, is:

Ward: Port Talbot	Settlement: Port Talbot	Building Name: Commercial Buildings	
Ref: POR014	Validation Stage I	Stage II	Grid Reference: E276904 N189508
Address: Corner of Talbot Road and Beverley Street			



Description: A prominent and striking three-storey commercial building retaining most of its original architectural features on the upper floors, including contrasting brickwork and stonework to the main elevations, decorative mouldings and some ground floor original features including prominent entrance and traditional shop fronts facing Beverley St.



Architectural Interest	X	Historic Interest		Historical / Cultural Association	X	Group / settlement character Value	X	Old or Rare Local Buildings	
Justification for Consideration: A prominent and noteworthy building reflecting the commercial past and growth of Port Talbot									
Notes:									

2.3 The Royal Commission for Ancient and Historic Monuments (Wales)

accessible on-line Coflein database, provides no entries for this building.

2.4 Archwylio: Glamorgan and Gwent Archaeological Trust's database, again has no entry for the building.

2.5 Neath Antiquarian Society: No Entry.

2.6 West Glamorgan County Archive Service: No entry found online.

2.7: Extensive online internet based search generated nothing of significance or real relevance.

Response: The current proposal has a positive impact upon the Building of Local Interest retaining it from a social/cultural perspective, architectural association and settlement as a building of modest quality.

2.6 Planning History relating directly to Commercial Building's:

- Details to be agreed in accordance with Condition 3 of (Extraction system details) of application P2021/1141 granted on 25.01.2022.

1-2 Commercial Buildings Talbot Road Port Talbot SA13 1DR

Ref. No: P2022/0243 | Received: Tue 15 Mar 2022 | Validated: Thu 17 Mar 2022 | Status: Decided

- Trough illuminated fascia and projecting sign

Commercial Buildings - Unit 1 & 2, Talbot Road Port Talbot SA13 1DR

Ref. No: P2021/1142 | Received: Mon 08 Nov 2021 | Validated: Tue 09 Nov 2021 | Status: Decided

- Change of use from A1 display or retail sale of goods, other than hot food retail, to A3 sale of food and drink for consumption (mostly) on the premises. The A3 restaurant and ancillary takeaway will have a new shopfront, new extraction flue to rear and a single storey rear extension.

Commercial Buildings - Unit 1 & 2 Talbot Road Port Talbot SA13 1DR

Ref. No: P2021/1141 | Received: Mon 08 Nov 2021 | Validated: Thu 25 Nov 2021 | Status: Decided

- Change of use of retail unit (use class A1) to hot food takeaway (use class A3), new shopfront, security shutters to front elevation and extraction flue to rear.

UNIT 6 COMMERCIAL BUILDINGS TALBOT ROAD PORT TALBOT SA13 1DR

Ref. No: P2015/0779 | Received: Wed 19 Aug 2015 | Validated: Tue 27 Oct 2015 | Status: Decided

3.0 Identifying changes proposed by the current application

The changes are clearly illustrated in the associated application, design and access statement, annotated photographs, and architectural drawings submitted and are internal with no significant damage accruing to the traditional fabric. It entails repair and minor alteration and refurbishment of the interior and sub-division into apartments. Maintenance repair, cleaning and redecoration to the exterior locally.

The Design and Access Statement confirms this:

The proposed development does not seek to alter the external appearance of the building and where maintenance is now necessary these will be undertaken in a sympathetic manner. The design principles and concepts are focused on retention of the significant historical internal features particularly those identified as important in the Statement of Significance.

3.1 Proposed Constructional Details

Ceilings: The failing lath and plaster ceilings some of which are in very poor order and unsafe will all be replaced with multi-layer fire resisting plasterboard that is skim plaster finished. Some ceilings lowered in places to also reduce the heated volume for residents, ensuring energy and carbon consumption is limited. The ceilings will utilise proprietary Licensed systems (British Gypsum, Lafarge, Rockwool, etc) that attain Building Regulation Class B (Fire) and Class E (Noise) attenuation standards.

Walls: Ditto. The internal separating walls between the units will be repaired/refaced with plaster and new partition walls, compartment walls also skim plaster finished and paint coated. Construction to meet Building Regulatory standards.

Windows and doors: Externally, these to be as existing. Internally, new FD30S certificated fire doors and frames need to be fitted.

Building Services: Modern services are today an essential criterion and will attain Building Regulation L requirements. The approach needs to be sensible, appropriate and compliant. All chimneystacks have been removed and flues are now redundant. Fire safety compartmentation is necessary.

Floor: Terrazzo areas to be retained. Other floors to receive fresh coverings to suit common part areas. Individual apartments created to have finishes suited to apartments. As the ground floor units cannot be disturbed the first floor deck will be upgraded from above using an acoustically attenuated raised floor system.

On the Talbot Road elevation one of the retail units currently has a very large single glazed steel metal framed window that was presumably added in the 1960's which is incongruous in its form. We gather that this is currently utilised as a store by one of the retail units. A

separate Planning Application will be made in the future for reinstating the fenestration to match the other window openings of the earlier build.

4.0 Policy Context.

4.1.1 National Planning Context

Planning Policy Wales, Edition 11 – February 2021; sets out the criteria and aims to establish a system setting out how for the benefit of all people, Welsh Government (WG) propose to exercise their functions to promote sustainable development.

WG is required to make a contribution to International, and UK targets for greenhouse gas emission reduction. The Climate Change Act 2008 providing the statutory framework for the reduction of greenhouse gas emissions in the UK. At the core of the Act is a requirement for the UK to reduce net UK greenhouse gas emissions and CO2 emissions.

The planning system plays an important role in tackling climate change and reducing greenhouse gas emissions.

The Human Rights Act which came into force in October 2000 incorporates provisions of the European Convention on Human Rights (ECHR) into UK law and enables the UK Courts to enforce these rights. The general purpose of the ECHR is to protect human rights and fundamental freedoms and to maintain and promote the ideals and values of a democratic society. It sets out the basic rights of every individual together with the limitations placed on these rights in order to protect the rights of others and of the wider community. The Human Rights Act makes it unlawful for a public authority to act incompatibly with these ECHR rights except where, as a result of primary legislation, it could not have acted differently. The Human Rights Act has implications for the planning system.

This Statement has been prepared taking cognizance of the Welsh Government's Planning Policy Wales, and in particular - Chapter 6, Distinctive and Natural Places - The Historic Environment (p.125) and Biodiversity and Ecological Networks (p.136). This scheme is about repairing and sustainably conserving the Historic Environment.

4.1.2 Primary Legislation

Primary legislation related to land-use planning includes:

- The Town and Country Planning Act 1990
- Historic Environment (Wales) Act 2016
- Planning (Wales) Act 2015,
- Well-being of Future Generations (Wales) Act 2015,

- Ancient Monuments & Archaeological Areas Act 1979

4.1.3 European Union

Although the UK has now exited The European Union (EU), their guidance currently remains active in part, as the contextual backdrop for planning policy and the preparation of development plans, as it was previously the basis of much UK legislation. This was being implemented by:

EU legislation (a range of Directives and Regulations, along with judgements of the European Courts).

The EU Sustainable Development Strategy adopted in 2006 and the 6th Environment Action Programme 2002-2012.

The European Spatial Development Perspective (ESDP) 14 and current EU territorial cohesion agenda¹⁵; and EU funding regimes, some of which the UK is still committed to post 'Brexit'.

4.1.4 Context for Planning in Wales

Planning Policy Wales (PPW) Edition 11, February 2021; sets out the land use planning policies of the Welsh Government, supplemented by a series of Technical Advice Notes (TANs). Procedural advice is given in best practice planning guidance and in this aspect, Heritage Impact Assessment in Wales and Managing Change to Listed Buildings in Wales.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.

The Wales Spatial Plan People, Places, Futures sets a strategic framework to guide future development and policy interventions. It integrates the spatial aspects of national strategies for social inclusion and economic development, health, transport and environment, translating Welsh Government's sustainable development duty into practice. PPW, and the TAN's/circulars represent best practice guidance.

National planning policy and the Wales Spatial Plan should be taken into account in the preparation of development plans. They may be material to decisions on individual planning applications and will be taken into account by the Welsh Ministers and Planning Inspectors in the determination of called-in planning applications and appeals.

Every local planning authority in Wales must prepare a Local Development Plan (LDP) for its area. The LDP is the development plan for each county or county borough council superseding the Unitary Development Plan (UDP).

HIA/SSComment: The proposed scheme as formulated aims to satisfy such criteria.

National planning policy argues in Planning Policy Wales 2021, that: “Recognising the strengths of urban communities, which are home to the majority of the population of Wales.

HIA/SSComment for Commercial Building's: The scheme as formulated acknowledges and fully supports this.

The Assembly Government's priorities for urban areas are, through integrated approaches, to: secure environmentally-sound and socially inclusive regeneration in those urban areas which require it, so that they become more desirable places in which to live and work; and foster sustainable change, in particular making it possible to live with less noise, congestion and traffic pollution, improving the quality of life.

HIA/SSComment for Commercial Building's: The scheme as formulated acknowledges and seeks to satisfy such criteria, filling redundant spaces at a time that many are challenged in NPTCBC, Wales and across the UK, as a consequence of the global pandemic, economic challenges and changing live/work/leisure approaches.

Development can help to arrest the decline in community facilities and deliver environmentally sound modernisation, re-use or replacement of urban infrastructure.”

HIA/SSComment for Commercial Building's: This is supported. The proposals are by a local individual delivering good quality residential accommodation and facilities using local staff and contractors. .

4.1.5 Cadw's Conservation Principles (2011)

Guidance that specifically relates to the conservation of historic buildings in Wales is founded upon established conservation principles, that ultimately have been developed via the ICOMOS Charters and BS 7913.

Cadw's six principles for the sustainable management of the historic environment in Wales are:

1. Historic assets will be managed to sustain their values.

HIA/SSComment for Commercial Building's: This is the intention of the application and is one of repair and reinstatement. Interventions made will be modest, minimal and fully reversible. Change of use supports the ongoing management.

2. Understanding the significance of historic assets is vital.

HIA/SSComment for Commercial Building's: This Heritage Impact statement and review of significance reinforces the comments and opinions of both Cadw and RCAHM(W). The most appropriate remediation is one that facilitates the care, conservation and reinstatement of

existing features where practicable, using traditional methods (where suitable) and details, reinstatement that is reversible, if in the very unlikely event that in years to come the situation changes.

3. The historic environment is a shared resource.

HIA/SSComment for Commercial Building's: Response: To quote William Morris and the SPAB: 'We are only custodians for those that come later'. The proposed repair works will sustain the building for the benefit of future generations' retaining character and significance where relevant. The building façade to the front, and sides will remain fully visible and readable. Photographs, Illustrations taken and drawings made before, during and after, of the repaired interior will be available as part of the Planning/LBC procedure and can also be added to archive material stores and depositories that exist within the community such as RCAHM(W) and GGAT if they seek this, now or in the future.

Everyone will be able to participate in sustaining the historic environment.

HIA/SSComment for Commercial Building's: Accepted. The building will remain visible and better cared for. Parts of the Building will be open during normal hours and other areas could be visited by agreement. The opportunity for local crafts persons to be involved in the building's care and repair will only add further to the skill base available locally.

Decisions about change must be reasonable, transparent and consistent.

HIA/SSComment for Commercial Building's: Response: The scheme submitted, attains this criteria, repairing the existing internal fabric.

4. Documenting and learning from decisions is essential.

HIA/SSComment for Commercial Building's Response: The scheme will record and document the works proposed, adding to wider knowledge of this building and its evolution.

Cadw's four heritage values:

1. *Evidential value: The building's form, fabric and detailing record many changes made in past times.*

HIA/SSComment for Commercial Building's: - agreed.

2. *Historical value: HIA/SSComment for Commercial Building's: - agreed, to be retained, and repaired. No significant adaptations or irreversible modifications are proposed*
3. *Aesthetic value: HIA/SSComment for Commercial Building's: Agreed, enhanced and preserved.*
4. *Communal value: HIA/SS Comment for Commercial Building's: Agreed. Another interest sector will be addressed by this proposal.*

4.2. Local Planning Policies:

4.2.1 Local Authority context -

When producing a Heritage Impact Assessment/Statement (HIA/SSSS) it is normal practice to consider the County Councils LDP.

The current Local Development Plan was adopted on by the Council on the 28th of February 2019. Under the provisions of the Planning (Wales) Act, the Neath Port Talbot LDP forms the statutory development plan for the Council. Together with the national plan, It will be used as the primary material consideration to inform decisions on planning applications and development proposals.

The LDP sets out land use policies and proposals to control development in the county borough.

HIA/SS Comment for Commercial Building's: The proposed scheme as formulated aims to satisfy all such criteria.

Key Policies:

5.5 Culture and Heritage P. 84.

5.5.1 Strategic Policy SP21 Built Environment and Historic Heritage P. 84

5.5.8 Policy BE1 Design P. 85

5.5.19 Policy BE2 Buildings of Local Importance P.86.

Response: The scheme as submitted meets these.

Further LDP Policies met:

3 Overarching Policies P.31

3.0.2 Strategic Policy SP1 Climate Change P. 33.

3.0.6 Strategic Policy SP2; Health P. 33

3.0.9 Strategic Policy SP3 Sustainable Communities P. 35.

3.0.19 Policy SC2 Protection of Existing Community Facilities P. 36.

3.0.23 Strategic Policy SP4 Infrastructure.

5.1.18 Strategic Policy SP8 Affordable Housing P. 54;

5.1.26 Policy AH1 Affordable Housing P. 55.

Supplementary Planning Guidance reinforcing the LDP is incorporated in the following documents:

AH1	Affordable Housing,	<u>SPG: Affordable Housing</u>	Published: October 2016
BE2	Buildings of Local Importance	<u>SPG: The Historic Environment</u> <u>SPG: Schedule of Buildings of Local Importance</u>	Published: April 2019

Summary Response: The scheme as submitted supports the principles and helps to meets these needs. The setting of the Locally Listed Building is not lost or negatively impacted but assured.

Conservation Areas

The boundaries of *conservation areas* within the County are shown on the Constraints and Issues Map but the building is not within a conservation area.

Response: Agreed. No change

Historic Parks and Gardens

The register of historic parks and gardens in Wales identifies parks and gardens and their settings which make an important contribution to the character of the country and which are deemed important to preserve or enhance

Response: Agreed, but not applicable.

2.6.18 The register of historic landscapes in Wales should be taken into account in considering the implications of developments, which meet the criteria for *Environmental Impact Assessment (EIA)*.

Response: Not Applicable.

Historic Environment Records

Archaeological Sensitive Areas

2.6.22. The GGAT identified *Archaeologically Sensitive Areas (ASA)* within the County and these are shown on the Constraints and Issues Map.

Response: Agreed, but in this instance it is not applicable.

2.6.23 *Listed buildings* are determined on the basis of their importance to the nation, either for their architecture or built quality, or for their historic associations. However, there are a large number of other buildings and undesignated heritage assets which, whilst not of sufficient quality or importance to be listed, make a significant local contribution.

Response: Agreed. This is the thrust of this HIA/SS but this is a building primarily of local importance.

3.4 Ecology and the natural environment

Response: The proposals are internal. There is no impact upon Ecology. The proposed scheme as formulated will satisfy such criteria, with all advice and guidance being considered.

Accessibility

Response: The building is eminently accessible for pedestrians, cyclists, motor-cyclists car, bus and main-line rail termini within Port Talbot and for travelling further afield.

It is against these contexts, that it is requested that the scheme is considered and supported.

4.0 Identification of the proposed changes to building elements, components and finishes, setting out the reasoning behind the preferred option.

The following table is not intended to be a building survey of the property but a schedule that provides a brief overview of the building's condition and construction. It has been provided purely to assist the listed building consent and planning application and for outlining recommendations.

4.1.1 Exterior:

Element/Component	Construction	Condition	Recommendation	Reasoning
Roof	Slate	Dirty and soiled.	Repair locally	To repair and retain the setting of the local heritage asset.
Walls	Facing brick and faience to front and side principal elevations.	Fair/Variable.	Consider repairs and Josh Conservation cleaning.	Ditto.
	Clay common brick to rear elevations..	Fair.		

			As existing other than minor maintenance repairs.	
Windows	PVC double-glazed.	Fair	Service, adjust as necessary, ensure trickle ventilation is provided as applicable.	To preserve the interior fabric and create a healthy indoor environment.,
Exterior Doors			Repair and modify or replace	To maintain the listed building in a watertight condition and address fire safety, egress and smoke requirements.

4.1.2 Interior

Element/Component	Construction	Condition	Recommendation	Reasoning
Ceilings.	These are generally lath and plaster but some have been repaired/replaced finished at one time or another. Their condition is widely variable.	Very poor. Much has been lost or severely damaged. The range of new uses proposed will require fire and acoustically attenuated ceilings. There is no virtue in retaining or reinstating in lath.	Replace with modern fire and noise protecting certificated systems.	To meet statutory requirements.

Walls.				
As constructed Office and welfare areas to the building. This section has been modified a number of times following the mid-1920's build as can be seen by the annotated photographic plates.	Rendered and skim plaster finished generally on to brickwork but many areas have since had their finishes removed or with lightweight stud walls constructed and clad with inappropriate modern sheet materials/linings.	Poor to fair.	Repairs and improvements will be necessary.	The existing do not appear to have any significance. New walls will have to meet Building Regulatory standards and will be single and double stud built partitions fire and acoustically attenuated.
Entrance Corridor and also former sanitary wings to upper floors on East Elevation projections.	Terrazzo to Hall	Clean and repair where necessary. Retain if practicable or cover with vinyl or similar sheet.		
Staircases ground floor to 1st floor.	Paint coated, with partially upgraded handrail and nosing's to existing stairs.	Poor and of excessive pitch.		
Staircase to 2nd floor.	Worn timber treads and some damaged areas.	Ditto.	Ditto.	Ditto.
Internal doors and frames.	Most are worn with a ad-hoc mix of flush ply, some solid core fire doors, panelled doors and heavily paint coated timber frames that will no longer meet modern safety standards. There are some hollow core	Many are relatively modern 1970-2000 date replacements and add nothing to the significance of the heritage asset.	Replace with new certificated fire safety doors and compliance as necessary with approved documents B and M. Door linings are also likely to be in need of renewal as intumescent and smoke seals need adding.	If the opportunity exists, one would ensure that the doors where possible would be of a traditional style. At this time moulded timber architraves could be reinstated.

	ply/flush hardboard doors.			
Skirting Boards.	Many are scuffed damaged or of different mouldings. They are paint coated and have eminently replaceable Torus or Lambs tongue, pencil-round type mouldings and similar details that are best uniformed and scaled to match individual rooms and future apartments..	Poor.	As part of any repair or renewal of sections of the building it would be sensible to consider renewing or repairing and matching.	The opportunity could be taken to enhance the Joinery details or repair and match.
Decorations.	Modern synthetic vinyl paints, papers and silica alkyd gloss finishes.	Poor and in need of renewal.	Redecorate but taking appropriate measures where older lead based paints may remain exposed or coated over..	The final designs internal be will depend upon the uses and the requirements of the residents. These are regularly updated finishes.
Building services				No significance. There are a necessary cost of modern life.
Heating	Existing modern radiators. Redundant solid fuel fires in places.			Service, repair and replace in accordance with modern building regulation requirements, AD L or low energy heat pumps depending on applications.
Ventilation			Upgrader to meet Building Regulatory standards for a Change of Use.	
Electrical services			Upgrade.	There are no significant historic light fittings. LED fittings could be incorporated in communal and service areas with possibly decorative light fittings to suit the ambience of the fit out.
Sanitary ware			Replace.	No significance.
Kitchen equipment			Replace.	
Roof space			Insulate and ventilate correctly.	

Lighting: The building will be provided with emergency lighting as a supplementary measure together with fire detection systems. Individual apartments and retail unit will be on individual circuitry. Given that modern building services have a relatively finite life these impacts are fully reversible should in the future, the building ever revert to single occupancy however unlikely this is. Impact - Minimal.

4.2 Reasoning behind the preferred option.

The architectural significance of Commercial Building's should be viewed within the context of its location, the history and the expansion that occurred during in Port Talbot the late 19th and early 20th centuries when the town was developing and infilling between Margam and the Town-centre as a result of the docks, coal and metal manufacture. The building was we gather, not built until 1924 but is of traditional design and was not influenced by the International Style/Modern Movement or Art Deco.

In recent decades, there has been a dramatic change in the make-up of town centres and increased residential occupancy can only help support a true and balanced community. Buildings within NPTCBC (like many others across the UK) are currently facing the enormous challenges posed by obsolescence in its many forms. This proposal safeguards Commercial Building potentially, in perpetuity.

Residential leaseholders together with the leaseholders of the smaller bespoke retail unit ensure via their occupation and service charge payments, can then contribute to the long-term care and sustainable management of this building; retaining it for the benefit of all that live and visit Port Talbot.

The front facing façades will be repaired and maintained in conjunction with the Authorities requirements.

5.0 ASSESSMENT OF IMPORTANCE / SIGNIFICANCE OF HISTORIC ASSET

IMPORTANCE / SIGNIFICANCE	ARCHAEOLOGICAL REMAINS	HISTORIC BUILDINGS	HISTORIC LANDSCAPES
Very High (international)*	World Heritage Sites Other sites of acknowledged international importance Sites that can contribute significantly to acknowledged international research objectives	World Heritage Sites Other buildings of recognized international importance	World Heritage Sites Historic landscapes of international value, whether designated or not Extremely well preserved historic landscapes with exceptional coherence, time depth, or other critical factor(s)
High (National)*	Scheduled Ancient Monuments Undesignated schedulable importance sites of quality and Sites that can significantly contribute to acknowledged international research objectives	Scheduled Ancient Monuments with standing remains Grade I and all Grade II* Listed Buildings (Scotland Category A) Other listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in their listing grade Conservation Areas containing very important buildings Undesignated structures of clear national importance	Designated historic landscapes of outstanding interest Undesignated landscapes of outstanding interest Undesignated landscapes of high quality and importance, and of demonstrable national value Well preserved historic landscapes, exhibiting considerable coherence, time depth or other critical factor(s)
Medium (Regional)*	undesignated assets that contribute to regional research objective	Grade II Listed Buildings (Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations Conservation Areas containing buildings that contribute significantly to its historic character Historic townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g. including street furniture and other structures)	Designated special historic landscapes Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value Averagely well-preserved historic landscapes with reasonable coherence, time depth or other critical factor(s)
Low (Local)*	undesignated assets of local importance Assets compromised by poor preservation and/ or poor survival of contextual associations Assets of limited value, but with potential to contribute to local research objectives	Locally listed buildings (unlisted) buildings of modest quality in their fabric or historical association Historic townscape or built up areas of limited historic integrity in their buildings, or built settings (e.g. including street furniture and other structures)	Robust undesignated historic landscapes Historic landscapes with importance to local interest groups Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations
Negligible*	Assets with very little or no surviving archaeological interest	Buildings of no architectural or historical note	Landscapes with little or no significant historic interest
Unknown*	The importance of the resource has not been ascertained	Buildings with some hidden (i.e. inaccessible) potential for historic significance	

Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)

5.1 MAGNITUDE OF IMPACT ON THE HISTORIC ASSET

MAGNITUDE OF IMPACT	ARCHAEOLOGICAL REMAINS	HISTORIC BUILDINGS	HISTORIC LANDSCAPES
Major	Change to most or all key archaeological materials, such that the resource is totally altered Comprehensive changes to setting	Change to key historic building elements, such that the resource is totally altered Comprehensive changes to setting	Total change to historic landscape character resulting from: Changes to most or all key historic landscape elements, parcels or components Extreme visual effects Gross change to noise or change to sound quality Fundamental changes to use or access
Moderate	Changes to many key archaeological materials, such that the resource is clearly modified Considerable changes to setting that affect the character of an asset	Changes to many key historic building elements, such that the resource is significantly modified Changes to the setting of an historic building, such that it is significantly modified	Moderate change to historic landscape character resulting from: Changes to many key historic landscape elements, parcels or components Visual change to many key aspects of the historic landscape Noticeable differences in noise or sound quality Considerable changes to use or access
Minor	Changes to key archaeological materials, such that the asset is slightly altered Slight changes to setting	Change to key historic building elements, such that the asset is slightly different Change to the setting of an historic building, such that it is noticeably changed	Limited change to historic landscape character resulting from: Changes to few key historic landscape elements, parcels or components Slight visual changes to few key aspects of the historic landscape Limited changes to noise levels or sound quality Slight changes to use or access
Negligible	Very minor changes to archaeological materials, or setting	Slight changes to historic buildings elements or setting that hardly affect it	Very small change to historic landscape character resulting from: Very minor changes to key historic landscape elements, parcels or components Virtually unchanged visual effects Very slight changes to noise levels or sound quality Very slight changes to use or access
No change	No change	No change	No change

5.2 SIGNIFICANCE OF IMPACT ON THE ASSET

MAGNITUDE OF IMPACT	VERY HIGH	HIGH	MEDIUM	LOW	NEGLIGIBLE
NO CHANGE	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>
NEGLIGIBLE	<i>Slight</i>	<i>Slight</i>	<i>Neutral/Slight</i>	<i>Neutral/Slight</i>	<i>Neutral/Positive</i>
MINOR	<i>Moderate / Large</i>	<i>Moderate / Slight</i>	<i>Moderate</i>	<i>Slight</i>	<i>Neutral</i>
MODERATE	<i>Large / Very Large</i>	<i>Moderate / Large</i>	<i>Moderate</i>	<i>Slight</i>	<i>Neutral/ Slight</i>
MAJOR	<i>Very Large</i>	<i>Large / Very Large</i>	<i>Moderate/ Large</i>	<i>Slight/ Moderate</i>	<i>Slight</i>

Adapted from ICOMOS guidance, Jan (2011).

MITIGATION: The works proposed have mitigated as much harm as possible to the asset by good design and minimising the intervention necessary to achieve these outcomes. The proposal uses appropriate materials and good quality design, as well as having considered the likely impact on the setting, surrounding buildings and environment.

6.0 CONCLUSION and OVERALL SUMMARY OF THE ASSESSMENT OF IMPACT ON THE HISTORIC ASSET

The magnitude of the proposed works deemed are minimal and almost all internal. On this basis, it is felt that there is sufficient justification to undertake the proposed works and that the actual overall outcome will be beneficial to the viability of the premises and the Town. This application offers a viable, continuing and sympathetic use for the building. The support of all parties is urged.

Trevor Francis