



LRM
PLANNING
LIMITED

THE BIG CAM, WINDSOR ROAD, NEATH CHANGE OF USE TO C3 USE CLASS

PLANNING STATEMENT

Prepared by LRM Planning Limited
on behalf of Castell Group

July 2023



Report Control

Project: The Big Cam, 9 Windsor Road, Neath.

Client: Castell Group

Job Number: 23.121

File Origin: LRM Planning Limited Team Site - 23\23.121 The Big Cam\6 Reports

Document checking

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Initialed: SC

Issue	Date	Status	Checked for issue
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Contents

Report Control	1
1 Introduction	3
2 Site description and context.....	4
3 Proposed development.....	6
4 Planning policy framework.....	8
5 Appraisal	13
6 Conclusion.....	15



1 Introduction

- 1.1 This Planning Statement accompanies a full planning application submitted on behalf of Castell Group for the change of use of ground floor space at The Big Cam from A3 use to C3, forming three additional affordable apartments. The site is located at 9 Windsor Road, within the town centre of Neath.
- 1.2 The units subject to the change of use application are located to the front of the building at ground floor level. A ground floor apartment already exists to the rear of the building, and it is therefore intended that the entire ground floor level will become residential.
- 1.3 This Planning Statement forms part of a suite of drawings and documents submitted with the application. The Planning Statement demonstrates the site's suitability to accommodate the proposed development. The full suite of documents and drawings submitted with this application therefore comprises:

Document	Prepared by
Planning application forms	LRM Planning
Planning Statement	LRM Planning
General Market Conditions Report	BP2 Land and Property Consultants
Site Location Plan	KJG Architects
Existing Ground Floor Plan	KJG Architects
Proposed Ground Floor Plan	KJG Architects
Existing elevations	KJG Architects
Proposed elevations	KJG Architects

- 1.4 The following sections discuss the site and its context; the proposed development; and planning policy context. This is followed by an appraisal of the development; and a conclusion in respect of the application submitted herein.



2 Site description and context

The site

- 2.1 The commercial space subject to this application measures 205sqm, and is set within The Big Cam, a former public house. At ground floor level there is an apartment to the rear, and nine self-contained apartments are set across the first, second, and third floors of the building. The building itself is up to four storeys in height at the entrance, albeit the remainder of the building is mostly three storeys.

Context

- 2.2 The Big Cam is located at the corner of Windsor Road and Alfred Street, within the identified town centre of Neath. It is outside of the primary shopping area and is surrounded by a mix of commercial and residential uses. More specifically, the site is bounded by:
- a Wetherspoons public house to the north, with Lloyds Bank, HSBC, and other commercial uses, beyond.
 - apartment blocks to the immediate east, with units further along Alfred Street comprising ground floor commercial uses with residential spaces at first floor level.
 - food and drink establishments to the south, with some residential uses at upper floor levels.
 - a vacant commercial building which was previously used by Royal Mail, and Neath railway station, to the west.
- 2.3 The site is approximately 100m south of Neath's primary shopping street, which provides access to additional local services and facilities, including an indoor market, retail stores (such as Marks and Spencer, Poundland, and Boots), and food and drink establishments. There are also a number of healthcare facilities in the vicinity, and educational provisions within 750m of the site.

Flooding

- 2.4 The Welsh Government Development Advice Maps show the site to be within Flood Zone A, which demarks areas at little or no risk of flooding.

Heritage context

- 2.5 The site falls within the Neath Town Centre Conservation Area, albeit the site is not shown to be a designated heritage asset. The Wetherspoons pub and Lloyds Bank to the north of the site are both Grade II Listed Buildings, and the old post office building opposite the site on Windsor Road is also Grade II Listed. There are a number of other designated assets within the vicinity, albeit these are the nearest.



Movement and access

- 2.6 The commercial space currently has two access points, one on Windsor Road, and one on the corner of Windsor Road and Alfred Street.
- 2.7 The site is located in an evidently sustainable location, within a short walking distance of the primary shopping street. It is located within the town centre and benefits from access to a wide range of local services and facilities.
- 2.8 There are bus stops located along Alfred Street, and a railway station located across Windsor Road provides access to a wider geographic area.

Planning history

- 2.9 The Big Cam comprises a former public house, which benefitted from permission for a change of use in 2019. Permission was granted (Ref: P/2019/5495) for:

"The conversion and alteration to public house to provide 1 no. commercial unit at ground floor (Class A3) and 10 no. self contained flats plus external staircase and removal of dormers, provision of roof lights and associated works".



3 Proposed development

- 3.1 This application seeks to convert the ground floor commercial space (use class A3) to three self-contained apartments (use class C3), similar to those which occupy the rest of the building. This change of use is being pursued in response to market trends, which have resulted in the commercial use of The Big Cam remaining vacant, despite being located within the town centre.
- 3.2 The proposals seek to provide three one-bedroom apartments at ground floor level, with generous sized open plan living room and kitchen spaces, and bedrooms with separate bathrooms.
- 3.3 The proposed changes are to mostly be internal, to accommodate the conversion from commercial to residential space. An external alteration will be required to facilitate the replacement of one of the two entrance points, with the entrance on the corner of Windsor Road being replaced with a new full-height window. Importantly, the rooms proposed to face onto Windsor Road are both living rooms. An entrance to the rear of the building is also proposed to be blocked to facilitate the development; this overlooks a storage cupboard/plant area.

Design

- 3.4 In terms of design, as the majority of works are to be internal, it is not anticipated that any external facades of The Big Cam will alter significantly. The entrance on the corner of the building, at the corner of Alfred Street and Windsor Road, will be replaced with a full-height window. A rear entrance is also to be lost, but due to its position within the site layout, this will only be visible to users of the rear courtyard.

Access and parking

- 3.5 As above, an access point is to be lost at the corner of Alfred Street and Windsor Road. All future occupiers will therefore utilise the entrance on Windsor Road which will provide access into an entrance hall, where the three apartments will be accessed. A second, rear access, is to be blocked up at ground floor level. This currently serves the commercial unit at ground floor, which is due to be lost.
- 3.6 Given the sustainability of the site, no vehicle parking spaces are proposed as part of this application. An additional cycle space is to be provided to the rear of the building.

Amenity

- 3.7 An existing courtyard is available at the rear of the building. This allows sufficient space for a bin store, cycle storage and clothes drying with rotary driers illustrated on the floorplans. This space is conveniently accessible off Alfred Street, via an obstacle free, paved route from the main entrance point.



Waste

- 3.8 As above, the rear courtyard has been retained for bin storage, which will serve the new apartments. This is to be accessed directly off Alfred Street.



4 Planning policy framework

- 4.1 The planning policy context for the determination of this application is provided by national and local planning policy guidance. National guidance is set out within Future Wales, Planning Policy Wales, and the accompanying Technical Advice Notes. Local policy comprises the adopted Neath Port Talbot County Borough Council Local Development Plan, and its supporting Supplementary Planning Guidance documents.

Future Wales: The National Plan 2040

- 4.2 Future Wales is Welsh Government's top-tier national development framework. It is a strategy for addressing key national priorities through the planning system over the next two decades. The key priorities include promoting sustainability and sustainable development, encourage development which promotes active lifestyles, and improving the health and well-being of our communities.

Planning Policy Wales

- 4.3 Planning Policy Wales (PPW) is the principal national planning policy document which sets out the land use policies of the Welsh Government (WG) against which development proposals should be assessed. The latest version is the eleventh edition, published in February 2021.
- 4.4 The main thrust of PPW is to ensure that the planning system contributes towards sustainable development and improves the social, economic, environmental and cultural well-being of Wales. Placemaking lies at the heart of PPW, with policy and development management decisions required to seek to deliver development that adheres to these principles.
- 4.5 In a bid to ensure placemaking is prioritised, and in order to aid in implementing the Well-being of Future Generations Act, policy topics within PPW have been grouped under four themes, namely '*Strategic and Spatial Choices*'; '*Active and Social Places*'; '*Productive and Enterprising Places*'; and '*Distinctive and Natural Places*'. Each of the four headed chapters is supplemented by detailed and interwoven policy, which seeks to work together in delivering sustainable places.
- 4.6 PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. In this regard it seeks to achieve WG's well-being goals. All statutory bodies in Wales carrying out a planning function must exercise those functions with the principles of sustainable development as defined in the Well-being of Future Generations Act. Accordingly, paragraph 1.18 of PPW states emphatically that '*legislation secures a presumption in favour of sustainable development*'.
- 4.7 Figure 4 of PPW covers the Key Planning Principles of WG in seeking to achieve "*the right development in the right place*". Development proposals must seek to deliver development that addresses these outcomes, albeit paragraph 2.20 recognises that not all of these outcomes can necessarily be achieved under every development proposal.

Strategic and Spatial Choices

- 4.8 It is indicated within PPW that the first stage of the assessment of proposals must take place in



respect of Strategic and Spatial Choices. In this regard it is stated that *“Effective strategic placemaking requires early collective consideration of placemaking issues at the outset... when developing specific proposals”*.

- 4.9 Paragraphs 3.3 to 3.18 of PPW highlight the importance of good design in *“creating sustainable places where people want to live, work and socialise”*. To achieve good design development, proposals need to meet the five overarching aims of design which comprise of access, character, community safety, environmental sustainability, and movement.
- 4.10 Accessibility is covered between paragraphs 3.49 and 3.52, wherein it is stated that the overarching aim of spatial strategies should be minimising the need to travel, reducing reliance on the private car, and increasing walking, cycling and use of public transport.
- 4.11 PPW seeks to ensure that proposals achieve a broad balance between housing, community facilities, services, and employment opportunities. Major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities should be sited within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.
- 4.12 PPW indicates that previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.

Active and Social Places

- 4.13 A key theme of PPW is creating places that are active and social, this includes sustainable transport provision for commercial development. The opening paragraphs to this chapter includes the following:

“It promotes retail and commercial centres as hubs, for a range of activities, recognising their social, cultural and economic importance.”

- 4.14 Paragraph 4.3.3 states that the planning system must:
- *“promote viable urban and rural retail and commercial centres as the most sustainable locations to live, work, shop, socialise and conduct business;*
 - *sustain and enhance retail and commercial centres’ vibrancy, viability and attractiveness; and*
 - *improve access to, and within, retail and commercial centres by all modes of transport, prioritising walking, cycling and public transport.”*

Productive and Enterprising Places

- 4.15 This chapter is more relevant to proposals relating macro level economy, energy, and use of resources, and therefore is not relevant to this application.



Distinctive and Natural Places

- 4.16 This chapter of PPW covers a range of topics, including cultural heritage matters, natural assets and environmental quality. The opening statement of the chapter states that:

“Development proposals should be formulated to look to the long-term protection and enhancement of the special characteristics and intrinsic qualities of places...Problems should be prevented from occurring or getting worse. Biodiversity loss should be reversed, pollution reduced, environmental risks addressed and overall resilience of ecosystems improved. “

Technical Advice Notes

- 4.17 The following Technical Advice Notes (TANs) are of relevance in the consideration of these proposals.

- TAN 2 – Planning and Affordable Housing (2006)
- TAN 12 – Design (2016)

- 4.18 TAN 2 relates to Planning and Affordable Housing and provides practical guidance on the role of the planning system in delivering such housing. It outlines the roles of registered social landlords in securing affordable housing provided through the planning system.

- 4.19 TAN 12 relates to Design and provides advice and information on a number of related areas including the definition of design for planning purposes; design considerations in planning decisions; and local planning authority design policy and advice.

Well-being of Future Generations Act

- 4.20 The Well-being of Future Generations Act imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principles, and to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Its content is sought to be delivered through the planning system via the intertwining of the Act through PPW.

Local Development Plan

- 4.21 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.22 The statutory development plan for this site is the Neath Port Talbot County Borough Council Local Development Plan (LDP) 2011 – 2026 (Adopted January 2016). As set out in the LDP, the Vision for the local authority area is dependent on a series of key objectives. Of relevance, these include:
- To minimise the causes and consequences of climate change through reduced greenhouse gas emissions and adapt to climate change through consideration of its effects in the design and location of new development.



- To reduce people's exposure to the determinants of poor health and provide an environment that encourages healthy, active and safer lifestyles.
- To deliver sustainable, safe and confident communities and develop vibrant settlements supporting a range and mix of facilities and services.
- To maximise accessibility to a range of leisure, recreational, health, social and community facilities in line with the role and function of settlements.
- To provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population.
- To increase accessibility, promote active travel and encourage a shift to more sustainable modes of transport for people and freight.

4.23 LDP Policy SP3 (Sustainable Communities) notes that the delivery of sustainable, healthy and cohesive communities will be promoted by defining sustainable communities and locations for development by the identification of a settlement hierarchy that reflects the role and function of settlements, and defining settlement limits within which development which accords with the settlement hierarchy will be permitted in principle. In this regard, it is noted that the site is situated in Neath, an identified town of the local authority area.

4.24 As above, the site falls within the settlement limit, and therefore development that is proportionate in scale and form to the role and function of the settlement will be acceptable in principle, as per Policy SC1 (Settlement Limits).

4.25 Given the site's location within the town centre, it is pertinent to consider policies of relevant to the town centre function. Policy SP12 (Retail) notes that the vitality, viability and attractiveness of retail centres in the authority will be enhanced and the retail provision will be protected, supported and developed through a series of measures. One such measure includes the identification of a retail hierarchy within which appropriate retail and mixed uses will be protected and encouraged.

4.26 Further, Policy R2 (Proposals within Retail Centres) states that proposals for the redevelopment or conversion within a retail centre of retail, commercial, leisure or community premises to ground floor uses which are not in use class A or D 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 service the community, or (c) the proposal would result in the redevelopment of derelict, unsightly, underused and vacant premises for alternative uses which would have significant social, community or regeneration benefits.

4.27 Mindful of the requirements of Policies SP12 and R2, it is noted that this application seeks to replace an existing, vacant, commercial unit/space, with a residential use. This is considered compliant with Policy SP12, which supports 'mixed uses' in retail centres. The loss of the A3 space is also considered justified in terms of Policy R2, as supporting material submitted as part of this application confirms that the current use is no longer viable (test a). It is also noted that whilst this space is currently in A3 use and could operate as a café, it has been vacant since



application P/2019/5495 was granted in 2019, and therefore would not qualify as the loss of an important asset serving the community (test b). Finally, the proposals seek to make more efficient and effective use of a currently vacant space, which will offer a significant improvement to the current presence of an empty space within a significant building on the streetscene (test c).

A summary of other pertinent LDP policies is provided as follows, listed in the order they appear in the LDP.

Policy	Relating to
Overarching policies	
SP1	Climate Change
SP2	Health
SC1	Settlement Limits
SP4	Infrastructure
Communities and Housing	
SP7	Housing Requirement
Transport	
Sp20	Transport Network
Culture and Heritage	
SP21	Built Environment and Historic Heritage
BE1	Design

Supplementary Planning Guidance (SPG)

4.28 In addition to the above policies, the following SPG are also relevant to this application:

- Parking Standards (October 2016); and
- Design (July 2017).

4.29 The Parking Standards SPG sets out that one space is required per bedrooms for apartments. This equates to a requirement of three spaces for this proposal. Appendix F of the SPG provides a sustainability assessment which justifies a reduction of parking spaces in some instances. It is noted that seven sustainability points, secured through the assessment, will justify the loss of one parking space per dwelling. Using this assessment, 11 sustainability points have been calculated, and the loss of one parking space per dwelling is justified. On this basis, the provision no spaces is compliant with the guidance contained in the SPG.



5 Appraisal

Overview

5.1 This section of the Planning Statement aims to identify the main issues relevant to the determination of the application and assesses the scheme against these.

- The principle of the development of this site in land use policy terms.
- The loss of commercial use.
- The design of the proposed development.

Principle of the development

5.2 The site comprises a redundant commercial unit, which has been vacant since planning permission was granted for its change of use from a public house in 2019. One residential use already exists at ground floor, and upper levels of the building are already in residential use.

5.3 As evidenced in earlier sections of this Statement, mixed uses are permitted in town centre locations, and the conversion of the site for residential use will support its wider function as an apartment building.

Justification for the loss of commercial use

5.4 The principle of converting this space from A3 to residential is evidently justified in planning policy terms as set out above. Further, the material submitted as part of this application demonstrates the measures which have been implemented to ensure that the site is no longer desirable, or viable, as an A3 use. BP2 Land Property Consultants have marketed the property since 2021, Q4. They note that enquiries have been extremely limited, with only one request to view the premises being made. It is also noted that there was no follow up interest in the premises following the viewing.

5.5 It is also worth noting that the subject site is poorly located for a commercial occupier to create/build a sustainable, thriving business, and the position of the site is secondary in a retail context, being situated on the fringe of the city centre. They conclude by stating that they have concerns over the ability to let the unit to a reputable commercial occupier who will be able to sustain trade from the premises, and recommend that *“one should consider redevelopment options to enhance the overall use of the building and its’ letting prospects, and particular reference should be paid to alternative use, including the residential sector”*.

Design

5.6 Minimal external alterations are proposed to the elevations of The Big Cam, with changes only being necessary to replace one entrance on the corner of Windsor Road and Alfred Street with a full height window, and to block up a second entrance to the rear.

Amenity



- 5.7 The loss of these entrances is not considered to have any impact on occupiers of existing dwellings. The ground floor corner entrance, and ground floor rear entrance, both only served the commercial unit, and therefore the loss of this will not have any impact of residents of the other 10 apartments. All existing residents will continue to access their apartments via the entrance on Alfred Street.
- 5.8 The proposed change of use and alterations will not otherwise change the building externally.



6 Conclusion

- 6.1 This Planning Statement is produced in support of proposals for the change of use of an A3 commercial space, with the intention of utilising this space for residential use (use class C3).
- 6.2 The principle of the development is established through the location of the site in the settlement boundary, in the town centre of Neath. Despite being located in the town centre, there are no policy constraints which require the space be continually utilised for commercial functions, nor that prevent utilising the space for residential use.
- 6.3 The proposed development demonstrates compliance with national and local policy. It is sustainably located and will make more effective and efficient use of space within the town centre.
- 6.4 In conclusion, it is considered that the proposal offers quality development of quality within a sustainable location, adhering to the placemaking agenda advocated by PPW. On this basis, it is respectfully recommended that Neath Port Talbot Council put this application forward for approval.

LRM Planning
July 2023