



PLANNING STATEMENT

**Conversion of Ground Floor Offices to a Residential Apartment,
with Retention of First Floor Residential Apartment
At 92 & 94 Commercial Street,
Ystalyfera, Swansea SA9 2HU**

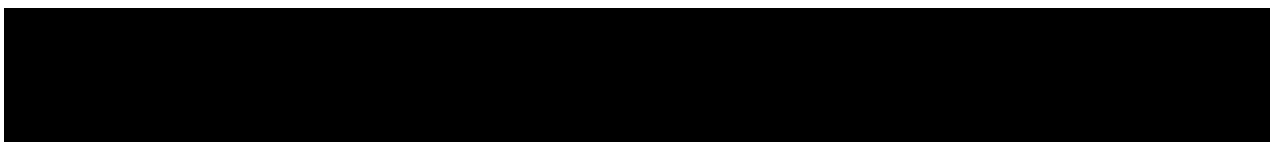
For: Prangle Property Limited

Our Ref: 1706a/RAB/RDG

Date: February 2024

1.0 Introduction

- 1.1 Evans Banks Planning is instructed by Prangle Property Limited to seek full planning permission for the “*Conversion of Ground Floor Offices to a Residential Apartment, with Retention of First Floor Residential Apartment*”, at 92 & 94 Commercial Street, Ystalyfera, SA9 2HU.
- 1.2 This Planning Statement forms part of the submission of the application to be considered by the Local Planning Authority and should be considered in tandem with the submitted location and site layout plans, together with the floor plans of the site in existence and proposed with new development.
- 1.3 This Statement focuses on the overall design concept being promoted under this application, and how it provides an innovative and imaginative redevelopment, in line with Planning Policy Wales Guidance and Neath Port Talbot Local Development Plan policies. It is firmly considered that the proposals to redevelop the former office buildings with a residential re-use are at a position where there will consequentially be no visual harm to the urban setting, matters of biodiversity and townscape, highway safety nor neighbouring residential occupiers’ amenities.



2.0 Site Description

- 2.1 The application site consists of a two-storey building set off the southern flank of Commercial Street, which is set immediately off the A4067 road. The property is located at the centre of the village of Ystalyfera.
- 2.2 The existing building is vacant, with its former use being that of offices at ground floor, with a residential flat at first floor. The building is an end-of-terrace property that is accessible via the pavement on the southern side of Commercial Street. The property wraps around the corner of the point at which Commercial Street meets a rear access lane, with the eastern side of the building facing east down Commercial Street, and the western side being adjoined to the buildings that lie off both Commercial Street and the rear access lane. The building's position on Commercial Street is illustrated in Photographs 1 to 4 below.
- 2.3 The existing building has no opportunities for off-street parking, with the only option for parking being the dedicated on-street parking bays which line the southern flank of Commercial Street.
- 2.4 However, neighbouring properties are all two-storey comprising a mix of short, terraced properties, with flats/apartments above and with commercial uses below and are equipped with plentiful rear lane parking, as will be discussed in further detail in Chapter 4.
- 2.5 Figure 1 below provides an extract from the Ordnance Survey Explorer map with the application site identified by a red arrow. Figure 3 is an extract from a more detailed OS plan, with the site edged in red for ease of identification. Figure 2 provides a Google Earth image from April 2021, which is typical of the current mixed residential and commercial setting in and about the centre of Ystalyfera.



Figure 1 – Location of 92 and 94 Commercial Street at Ystalyfera



Figure 2 – Google Earth image of the application site locality – April 2021

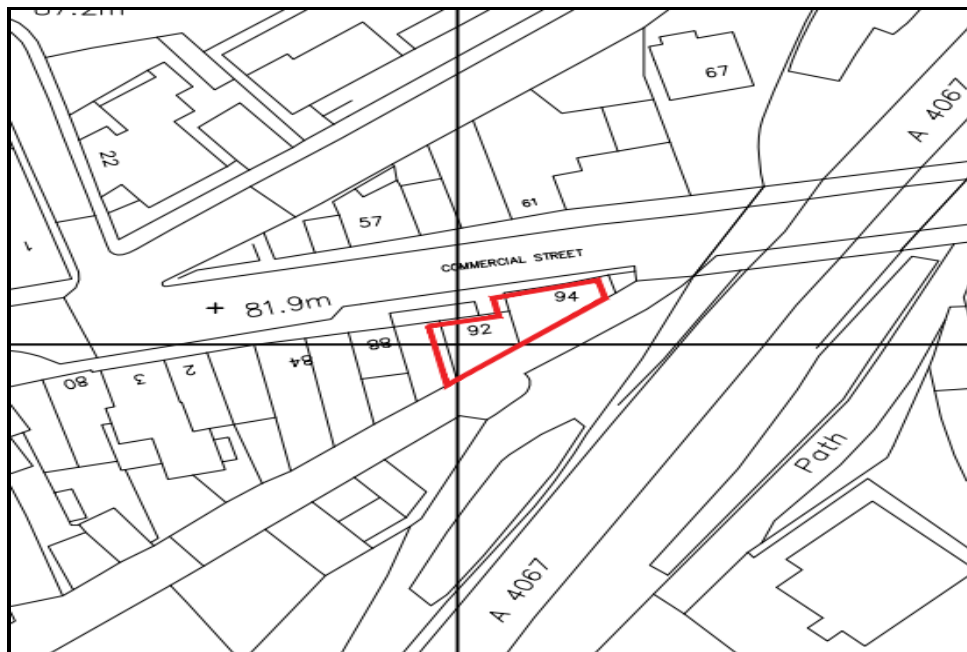


Figure 3 – Location plan of 92 and 94 Commercial Street

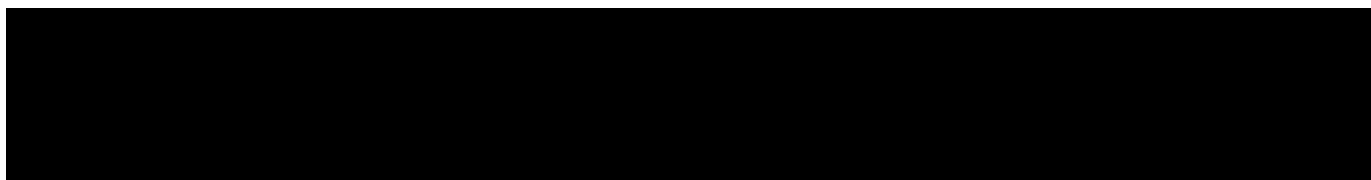
- 2.6 At ground level, the existing building can be viewed from Commercial Street, as shown in Photographs 1 to 5 below, which also illustrates the extent of lane to the rear of the property.



Photograph 1 – Existing Building Viewed from Commercial Street



Photograph 2 – View of the Eastern Side of the Building

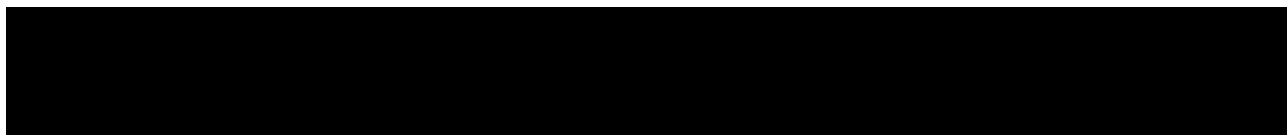




Photograph 3 – View of the Western Side of the Building



Photograph 4 – Streetscene of 92 and 94 Commercial Street



3.0 Application Proposals

- 3.1 The proposals seek planning permission to convert the ground floor of the two-storey existing building at 92 and 94 Commercial Street into a one-bedroomed flat, whilst retaining the existing one bedroomed residential flat. The mass and scale of the main building will remain as existing.
- 3.2 The main building will remain equipped with its two entrances off Commercial Street that will lead into the two flats. The entrance to 92 Commercial Street will lead immediately into a kitchen area, and onwards to a lounge, home office and bedroom area. The entrance to 94 Commercial Street will continue to lead directly to a staircase that will provide access to a first floor arrangement that the ground floor will now seek to match. There is also a basement to the building that will remain as existing in terms of mass and scale but will be used for storage purposes.
- 3.3 Figures 4, 5 and 6 below show the proposed internal arrangement, which seeks to match the scale and layout of the existing rooms.

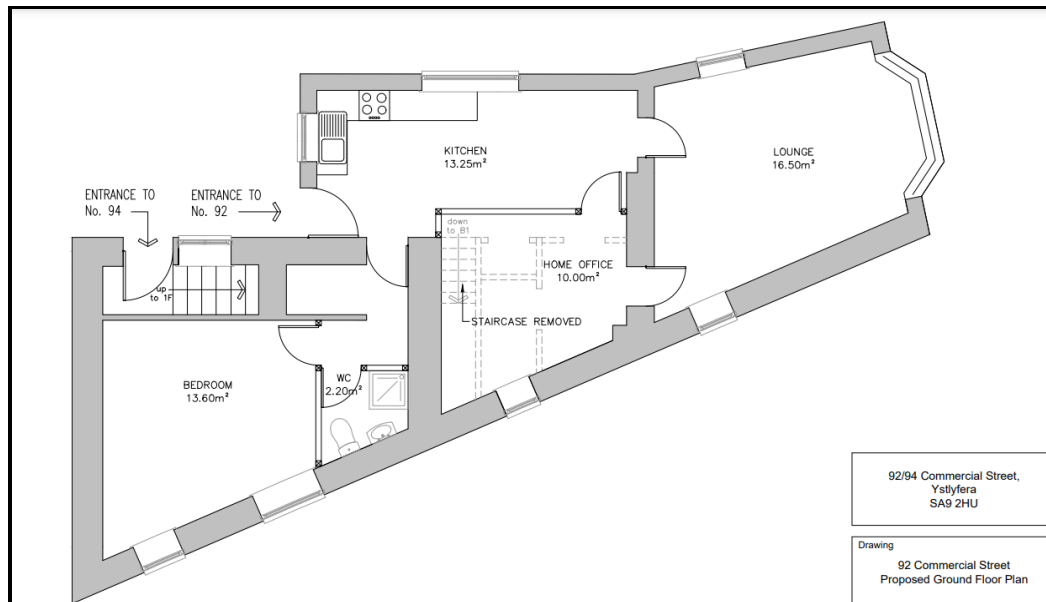


Figure 4 – Proposed Ground Floor Plan of Conversion to a Residential Apartment

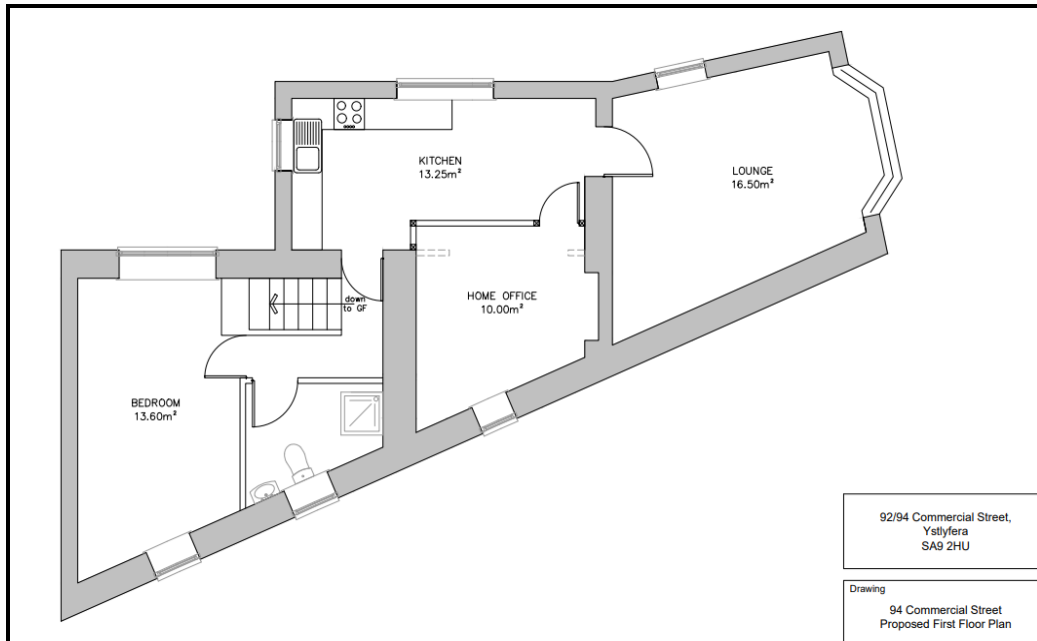


Figure 5 – Existing First Floor Plan of a Residential Apartment

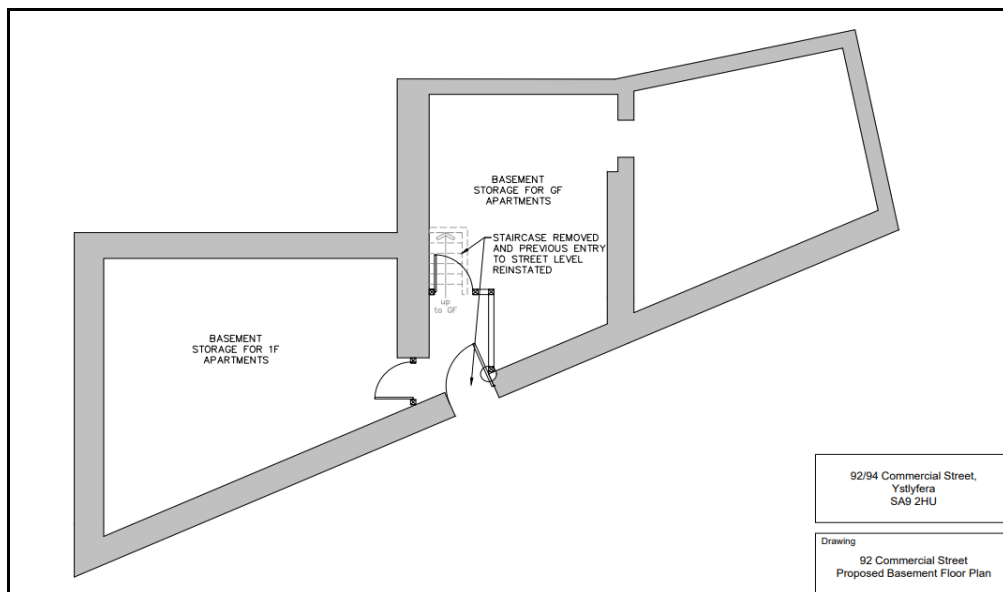


Figure 6 – Proposed Basement Plan of Conversion to a Residential Apartment

4.0 Policy Context

4.1 National Planning Policy

4.1.1 Planning Policy Wales (Edition 11) (February 2021) has a significant focus on Placemaking principles, and that development should be seen in the context of any special characteristics inherent in a locality. Paragraph 3.9 indicates that *"The special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations."*

4.1.2 Paragraph 3.10 goes further *"In areas recognised for their particular landscape, townscape, cultural or historic character and value it can be appropriate to seek to promote or reinforce local distinctiveness. In those areas, the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important."*

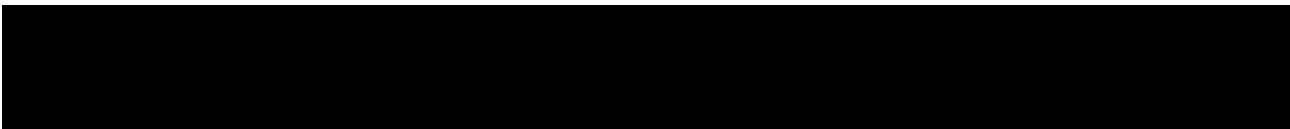
The emphasis in this approach is whether an area exhibits "special characteristics," or is "recognised for their particular landscape, townspace.....character" which in the case of the immediate locality and neighbourhood of Commercial Street is not evident, and thus the particular design proposed within this application is argued as otherwise adjudged as acceptable, at Section 6 below.

4.1.3 Paragraph 3.16 goes on to indicate to Local Planning Authorities that *they "should not attempt to impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions."*

4.1.4 National Planning Policy in respect of the parking requirements of residential proposals are to be found in Technical Advice Note (TAN) 18 "Transport", produced by the Welsh Assembly in March 2007. Paragraph 4.7 provides guidance on the level of car parking required for developments. It stresses that *"local planning authorities should have regard to public transport accessibility; opportunities for walking and cycling; opportunities for economic development; the availability in the general area of safe public on and off-street provision, and; potential for neighbouring or mixed use development sharing parking spaces, for example at different times of the day or week."*

Paragraph 4.15 indicates that *"some car free housing development may be appropriate in locations with good walking, cycling and public transport links, and in areas where parking is controlled."*

Paragraph 4.16 stresses that LPAs should assess a *"site's location and its relative accessibility should inform guidance on maximum standards.... and the accessibility of the housing site by modes of travel other than the car...."*



4.2 Local Planning Policy

- 4.2.1 The development plan in form for the purposes of Section 38(6) of the Planning & Compensation Act 2004 is the Neath Port Talbot County Borough Council Local Development Plan, which was adopted in January 2016.
- 4.2.2 Commercial Street is located within the defined Settlement Limit of - SC1 - Swansea Valley, within the Strategy Area SP6 – Valleys Strategy Area and as a Local Centre - R2/1 – Ystalyfera. This is shown in Figure 7 below.

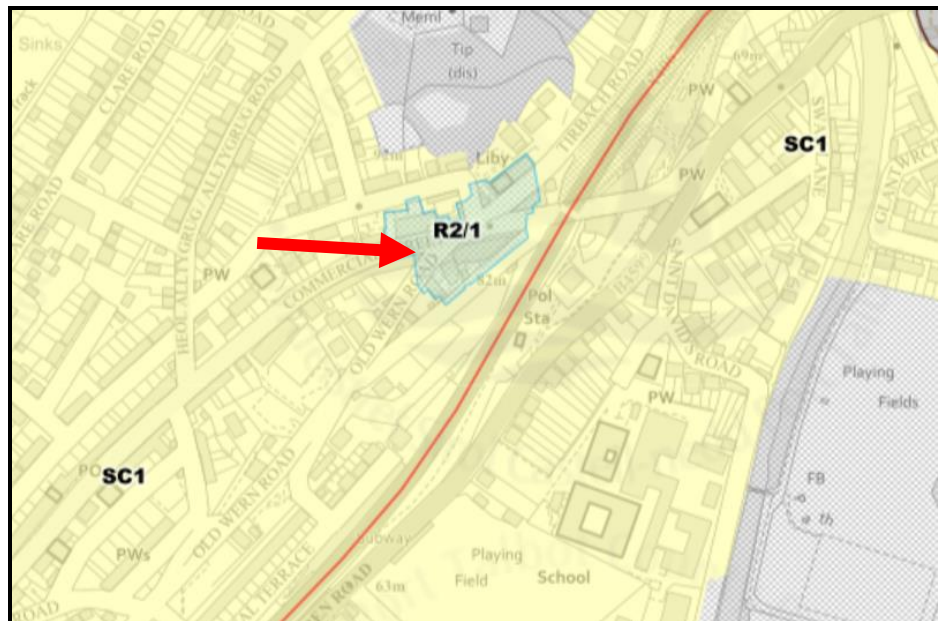


Figure 7 - Extract from LDP Proposals Map for Ystalyfera with Site Highlighted

- 4.2.3 Policy SP 3 “Sustainable Communities” is relevant, and states that:
“The delivery of sustainable, healthy, and cohesive communities and the conservation of the countryside will be promoted by:
1. *Defining sustainable communities and locations for development by the identification of a settlement hierarchy that reflects the role and function of settlements.*
2. *Defining settlement limits within which development which accords with the settlement hierarchy will be permitted in principle.*
3. *Resisting inappropriate development outside settlement limits”.*
- 4.2.4 The position of Ystalyfera as a Large Local Centre means that it can be defined as a “Settlement with adequate public transport links with clusters of one or more retail units and local services, with one or more community facilities and employment provision,” which is in accordance with the components of Policy SP3.
- 4.2.5 The locality is **not** afforded any protective status such as a Conservation Area. Neither is the application building designated as a Listed Building, with none of any surrounding buildings otherwise designated as such. No other buildings in the immediate locality are regarded as of architectural or historic interest.

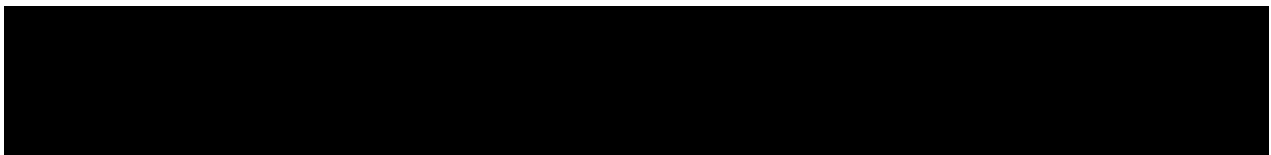
4.2.6 **Policy SP20 (Transport Network) and TR2 (Design and Access of New Development)**

Policies SP20 and TR2 requires adequate off-road car parking to be provided for all new development. However, in this case, the existing use of the building and site is that of an office building at ground floor. The first floor already functions as a residential flat in the absence of any off-street parking provision. Therefore, it can be considered that the same parking requirements would have existed for these established uses. The site does not have any off-street car parking provision, and thus visitors to the property would have to compete for the use of the existing dedicated on-street car parking bays with local residents. However, the South Wales CCS Parking Standards and Neath Port Talbot Councils Supplementary Planning Guidance on Parking (2016) provide guidance as to what requirements there would be for parking demand, and also in localities which are highly sustainable such as that at Commercial Street.

This Statement sets out the highly sustainable attributes of the locality at Section 5 below and establishes what the SPG and CCS Parking Standards would dictate for parking requirements in such a locality well served by shops, community venues, public transport, and cycle routes.

5.0 Parking Provision Based Upon Locality Sustainability

- 5.1. Due to the unavailability of off-street parking at 92 and 94 Commercial Street, new occupants of the proposed flats will make use of the existing on-street parking bays. As the previous use of the property was for office use at ground floor and residential at first floor, it is considered that issues regarding parking provision would have been the same under those established uses. The presence of a rear lane for parking of neighbouring properties' occupants eases the pressure on the on-street parking bays, which provides an opportunity for the future occupiers of 92 and 94 Commercial Street to use those on-street bays.
- 5.2. This proposed development will remain in accordance with LDP Strategic Policy SP20 (Transport Network) and Policy TR2 (Design and Access of New Development). The proposal will also ensure an adherence to The NPT Parking Standards that encapsulate the CSS Wales' Wales Parking Standards and Joint Transport Plan (JTP)(2).



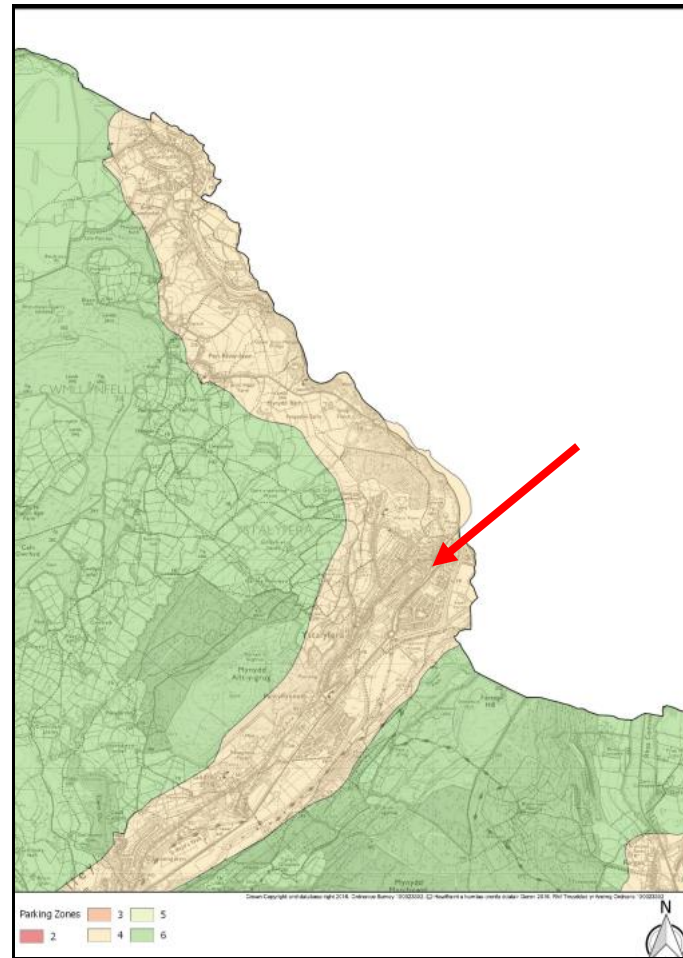


Figure 8 – Parking Standards Zone Map in Neath Port Talbot Council (Site Highlighted by Red Arrow)

- 5.3 The standards have adopted Zones, for which different criteria apply when assessing the level of car parking required for residential developments. In this instance, the Ystalyfera neighbourhood, (as shown in the Figure 8 above) can be categorised as “Suburban or Near Urban,” and thus within a Zone 4 classification under the Parking Standards. This recognises that residents have opportunities to access basic amenities in the local centre which is within 400 metres walking distance. There is also expected to be adequate access to public transport services such a bus service that runs at least hourly. The Local Highway Authority would normally request one parking space per bedroom of each new dwelling / flat within a Zone 4 location.
- 5.4. The application proposals illustrate for one new one-bedroomed apartment, and retention of an existing first floor apartment. Ordinarily, the SPG indicates would insist upon 1 x 2 spaces to arrive at a total of 2 spaces, as shown below.

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

Notwithstanding the above, Annex F of the SPG allows for a reduction of the number of required spaces at sustainable locations, dependant on the site's distance from public transport and community facilities. The CSS guidance indicates that sustainability points are awarded based upon two of the above facilities being within the same range from the site. Within 200 metres walking distance being awarded 3 points, 400 metres – 2 points, and 800 metres – 1 point. If there are more than two facilities in a distance range, then the score can be doubled.

A score of seven points can lead to a reduction of one space per unit whilst ten or more points to a reduction of two spaces per unit.

- 5.5. Based on the guidance of the SPG and the associated scoring system, the following information should be taken into consideration in determining the appropriate level of car-parking provision for the application proposal:

Local Facilities

- Home Bargains– 439m
- Tesco Superstore –800m
- Premier Express – 539m
- Post Office – 84m
- Amman Tawe Partnership Medical Centre – 83m
- Ysgol Gyfun Ystalyfera– 643m

Transport

- Bus Stop - T6 Traws Cymru – 643m
- Bus Stop - 121, 903, T6 Traws Cymru, X6 Cymru Clipper – 322

- 5.6. Based on the above and the guidance of the SPG, the application site is clearly at a very sustainable location. There are a considerable number of amenities located within a short distance of the site, whilst the bus stops located nearby provide adequate transport links that frequent every 30 minutes.

From 92 and 94 Commercial Street, a total of 3 facilities are within 200 metres, thus achieving **3 points**.

For accessibility to “Public Transport,” points are awarded as follows - Within 300 metres – 3 points, within 400 metres – 2 points, and within 800 metres – 1 point.

Therefore, in the case of Commercial Street, there are bus stops with the closest being at a distance of some 322 metres, and thus achieves 2 points. This results in a total of **2 points** for proximity to public transport.

Points are also awarded or deducted in terms of the “Frequency of Public Transport.” The service must be consistent between the hours of 07:00 and 19:00. One to three points are awarded on services operating every 5 to 30 minutes, respectively. The bus

stop lies on the most principal route within Ystalyfera – Services T6, 121, 903, and X6, with the services calling, and at least once every 30 minutes Mondays to Saturdays and once every hour on Sundays, therefore **1 point** is achieved.

A total of $3+3+1 = \mathbf{7 \text{ points}}$ can be awarded to the Commercial Street development, equating to a wholesale reduction of what would in theory be required for on-site car parking facilities. In short, therefore, the sustainable location of the site results in the CSS Wales Standards **not requiring any on-site car parking above the one space per unit proposed.**

5.7 Walking Opportunities

Figure 9 below illustrates a 15-minutes' walking distance from the application site. Such a walk would take new residents south along Ynysydarren Road, north on Gurnos Road towards Gurnos, and St Davids Road to the east leads directly to the river Tawe to the south and east.

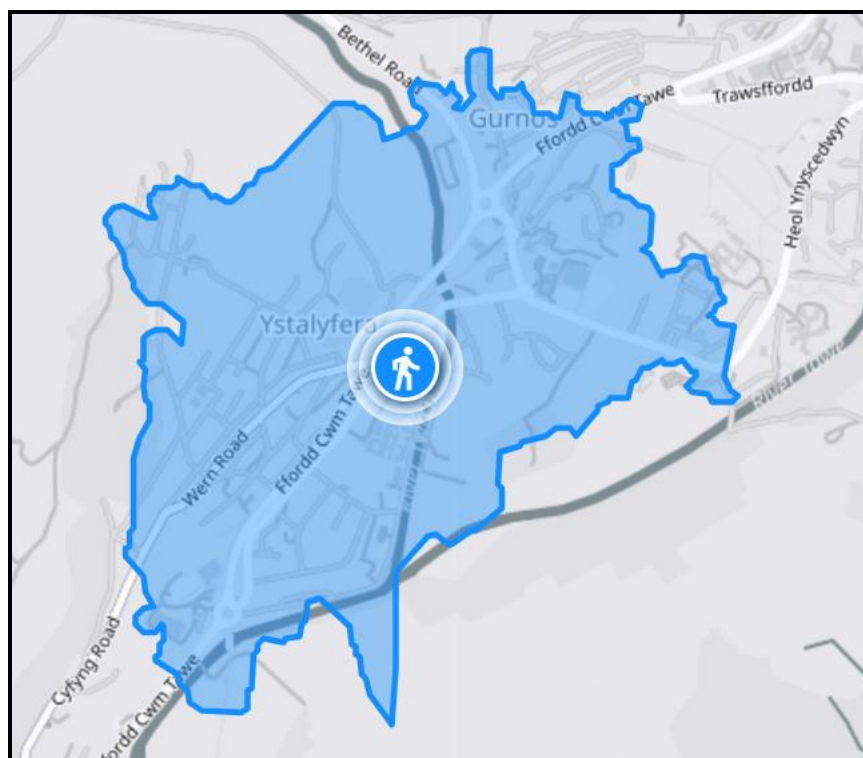


Figure 9 – 15-minutes Walking Distance from Application Site

5.8 Cycling Opportunities

By cycle, a short 20 minutes' cycle takes riders a significant distance by virtue of the close proximity of **National Cycle Route 43** which is accessible immediately east off Commercial Street, less than one kilometre from the site. Figure 10 shows the 15-

minute cycling radius from Commercial Street, whilst Figure 11 shows the close proximity of the site to the **National Cycle Route 43**.

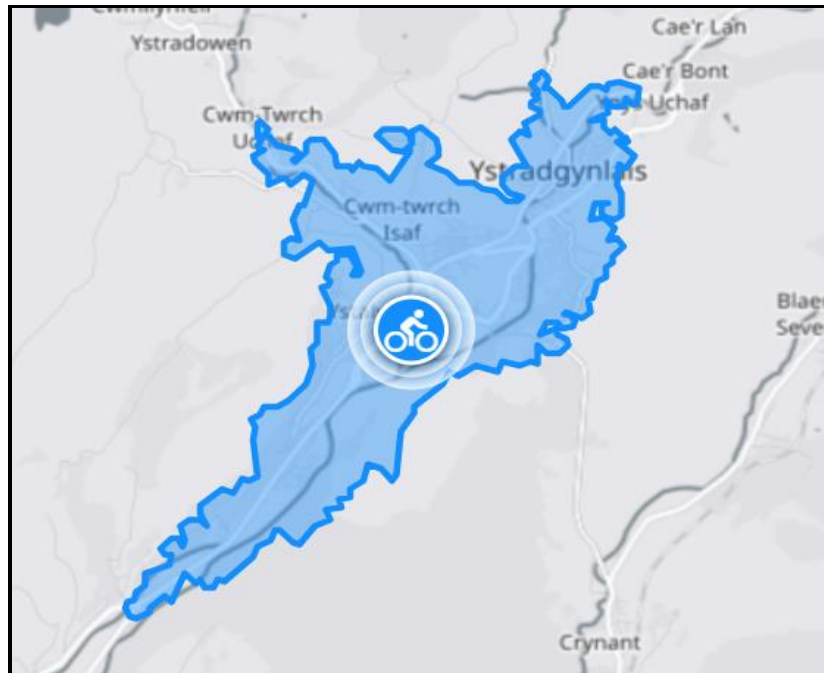


Figure 10 – 15-minutes Cycling Distance from Application Site

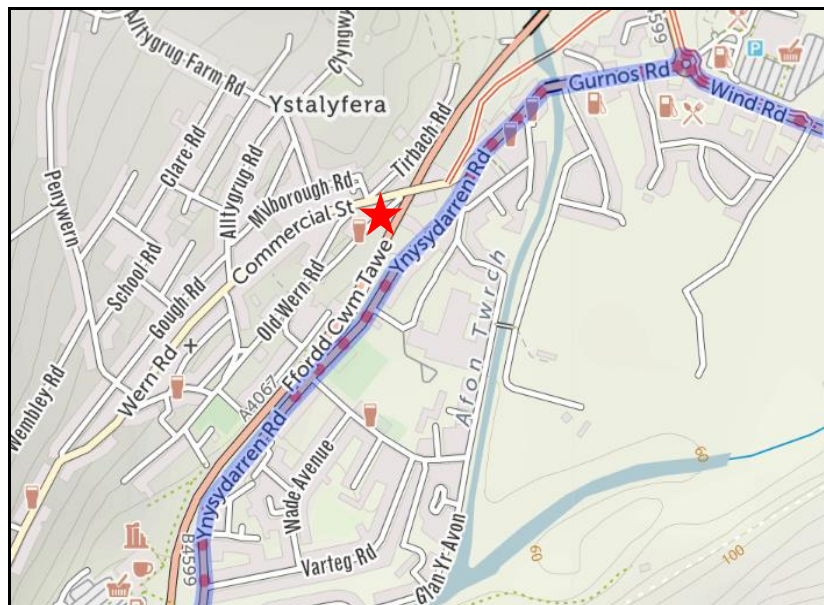


Figure 11 – Showing the Close Proximity of the Site (Red) to the National Cycle Route 43 (Purple Line)

5.9 Existing On-Street Parking Opportunities

Given the presence of double yellow lines immediately outside of the property, the proposals do not indicate for any off-road provision. Instead, it is submitted that new ground floor apartment occupants could take advantage of the **availability of on-**

street bays that have been formed directly in adjacent of the application site. Figure 5 shows the parking bay located at Commercial Street, which shows that **with a Permit, a total of at least five domestic vehicles can park unrestricted from Monday to Saturday between 8am and 6pm**. Outside of these hours, parking is unrestricted, and is a time more indicative of when a new flat occupant is more likely to be at home after a working day. Existing businesses on the street have also ceases trading at those evenings and weekend times, and thus the availability of spaces to park is likely to be more abundant.

- 5.10 To the rear of 92 and 94 Commercial Street is a lane that provides parking for the houses and flats immediately adjoining the site. It is submitted that this results in less demand for the use of the dedicated street parking bays, and thus allows the occupants of 92 and 94 Commercial Street to use the spaces.



Photograph 1 – Showing Double Yellow Lines Adjoining the Property and the Dedicated Parking Bay to the South of the Site



Photograph 2 – Showing On-Street Parking Sign and Restrictions on Parking.



Photograph 3 – Showing the Rear Lane



Photograph 4 – Showing Plentiful Parking Arrangements at the Rear Lane for Neighbouring properties.





Photograph 5 – Further Illustrating Parking Arrangements in Rear Lane for Neighbouring Properties.

- 5.11 Should the ground floor of 92 and 94 Commercial Street also be converted to a residential apartment, the on-street parking bays **would have to cater for only one additional residents' vehicle**. Despite the unavailability of off-street parking, it is considered that the previous ground floor use of the property as an office would have faced the same issues regarding suitable parking provisions.

The on-street parking bay situated to the west of the site along Commercial Street allows those with permits to **park legally from Monday to Saturday between the hours of 08:00am and 6:00pm unrestricted**. Residents occupying properties adjoining 92 and 94 Commercial Street also have access to a rear lane with ample space for parking as shown in the Photographs above. Therefore, it can be deemed to be fully catered for and would be unlikely to experience a reduction of available on-street parking supply if the ground floor of 92 and 94 Commercial Street were converted to residential use.

- 5.12 It is submitted that the maximum parking needs for two apartment residents to park within the **existing five on-street spaces off the western flank of Commercial Street** would not generate a detrimental loss of available parking in the area.

This is particularly justifiable given the modest parking restrictions in place on the street, and also the overwhelming number of local facilities and public bus stops which can also equate to **some new residents not needing a motor car** and be self-sufficient by walking, cycling, and using public transport whilst residing at 92 and 94 Commercial Street.

It is submitted that the proposals **would comply with LDP Strategic Policy SP20 (Transport Network) and Policy TR2 (Design and Access of New Development)**.

6.0 Conclusion

- 6.1 The proposals seek to redevelop the ground floor of 92 and 94 Commercial Street and in doing revitalise a redundant established building located in the centre of Ystalyfera. The proposals are able to re-develop the building without any external alterations and provide each new occupier with adequate living space.
- 6.2 In the context of the location of the site, the locality is found to be highly sustainable with a high number of retail, community, and public transport nodes within 600 metres of the site. Those facilities are accessible over level ground and via good pedestrian footways, bolstered by effective pedestrian crossings of Commercial Street. New residents need not have a necessity for a personal motor car, but can walk, cycle, or catch a public bus to work, access retail stores, the local primary school, with the national cycle route also in close proximity.
- 6.3 Sufficient on-street parking bays exist on Commercial Street to cater for existing and new residents, particularly the number expected to be resident in the application property. The proposals will be in accord with LDP Policies SP20 and TR2, as well as the relevant SPG advice.
- 6.4 Therefore, the proposals meet the criteria of all identified Local Development Plan policies, and accordingly seek to provide a residential redevelopment comparable with adjoining uses at Commercial Street.

