



Lloyd Britton
ARCHITECT

Lloyd Britton Architect Limited
13, Sturminster Road, Cardiff, CF23 5AQ
M: 07967 017749
E: lloyd@lbarchitect.co.uk

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HERITAGE IMPACT STATEMENT

Project:

PROPOSED CHANGE OF USE OF FIRST AND SECOND FLOOR OFFICE (USE CLASS B1) TO A HOUSE IN MULTIPLE OCCUPATION (USE CLASS SUI GENERIS)
at 43, NEATH ROAD, BRITON FERRY, PORT TALBOT, SA11 2DX
for JOE WILSON (A.J. WILSON PROPERTY LIMITED)

Date:

AUGUST 2024

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1.0 INTRODUCTION & REPORT OBJECTIVES:

1.1 INTRODUCTION AND PURPOSE

- 1.1.1 This 'Heritage Impact Statement' has been prepared in support of a Full Planning application for the 'Proposed change of use of first and second floor office (Use Class B1) to a House in Multiple Occupation (Use Class Sui Generis)' at 43, Neath Road, Briton Ferry, Port Talbot, SA11 2DX.
- 1.1.2 The application has been submitted on behalf Joe Wilson (A.J. Wilson Property Limited), by Asbri Planning supported with architectural services provided by Lloyd Britton Architect Limited. The works have not been started.

The site occupies a prominent corner plot on the junction of Neath Road and Villiers Street in Briton Ferry and is thought to date from the mid-19th century. The building is not a statutorily listed building by Cadw and neither is it located in a designated Conservation Area. It is, however, scheduled as a Building of Local Importance (BLI) by Neath Port Talbot Council Borough Council (Ref: BFE001).

A pre-application enquiry (Ref: Q2022/0188) was submitted in 2022 by Asbri Planning for the 'Proposed change of use of first and second floor office (B1) to a house in multiple occupancy (C4) or apartments (C3)'. In the Council's pre-application advice dated 4th November 2022, it was noted that:

"The application building is identified as a building of local importance, and while it is not Listed by CADW, the local listing is considered to identify the historic character of the building on the corner plot and widely visible from the main road passing through Briton Ferry. The applicant may wish to consider submitting a Heritage Impact Assessment to support any planning application submission."

The Council's pre-application response further reiterates the requirement for any subsequent application to be accompanied by a Heritage Impact Assessment in a section contained in the advice headed 'Required Supporting Documentation'.

In light of this requirement, this statement seeks to establish the history of the heritage asset and its setting and provide an assessment of the significance of the building in order to inform an appropriate heritage-led approach to the proposed change of use of the building. It considers the proposals and assesses the heritage impact that the proposals would have and, where appropriate, identifies potential mitigation.

1.2 AUTHORSHIP

- 1.2.1 This document has been prepared by Lloyd Britton of Lloyd Britton Architect Limited in support of a full application for planning permission submitted by Asbri Planning.
- 1.2.2 Lloyd Britton is registered with the Architects Registration Board (ARB No. 061270G) and is a Chartered Architect with membership of the Royal Institute of British Architects (RIBA) and the Royal Society of Architects in Wales (RSAW) (Membership No. 8543566). Lloyd Britton Architect Limited is a RIBA Chartered Practice (3087604P).

Lloyd Britton has also recently graduated with a master's degree MSc in Sustainable Building Conservation from the Welsh School of Architecture at Cardiff University.

1.3 POLICY CONTEXT

- 1.3.1 This Heritage Impact Assessment has been prepared in the context of both national and local planning policy. These national and local planning policy frameworks are noted below and set out the policy context for the determination of this application.

1.3.2 National Planning Policy:

The following statutory instruments provide the legislative framework for the protection and sustainable management of the historic environment in Wales at a national level.

- **Planning (Listed Buildings and Conservation Areas) Act 1990**
Paragraph 16(2) states that:

“In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

- **Planning Policy Wales – Edition 12 (February 2024) – Welsh Government**

Paragraph 6.1.5 states that:

“The planning system must take into account the Welsh Government’s objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations. The historic environment is a finite, non-renewable and shared resource and a vital and integral part of the historical and cultural identity of Wales. It contributes to economic vitality and culture, civic pride, local distinctiveness and the quality of Welsh life. The historic environment can only be maintained as a resource for future generations if the individual historic assets are protected and conserved. Cadw’s published Conservation Principles highlights the need to base decisions on an understanding of the impact a proposal may have on the significance of an historic asset.”

Paragraph 6.1.6 states that:

“The Welsh Government’s specific objectives for the historic environment seek to...safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved...”

Paragraph 6.1.13 states that:

“Applicants for listed building consent must be able to justify their proposals, show why the alteration or demolition of a listed building is desirable or necessary and consider the impact of any change upon its significance...”

- **The Historic Environment (Wales) Act 2016 – Welsh Government**

The Historic Environment (Wales) Act 2016 is the first legislation enacted specifically for the historic environment of Wales. It makes important changes to the Planning (Listed Building and Conservation Areas) Act 1990 that affect how Welsh listed buildings are designated, protected and managed.

- **Planning Policy Wales – Technical Advice Note 24: The Historic Environment (May 2017) – Welsh Government**

Paragraph B.7 of Annexe B: Listed Buildings defines the relative importance of the listing grade of buildings, categorising Grade II as *“buildings of special interest which warrant every effort being made to preserve them.”*

- **Managing Change to Listed Buildings in Wales (May 2017) – Cadw**

Section 4.7 – Change of Use states that:

“Sometimes, buildings cease to be useful for their original purpose and new uses may be necessary to secure their long-term viability. This is particularly true of redundant farm buildings, industrial buildings, places of worship or large houses, for example. Change of use will almost invariably result in loss of historical form, fabric or detail, such as internal fittings, but these losses should be kept to the minimum necessary so that the original use can still be legible.

When considering change of use, care needs to be taken not to over develop a listed building. For example, when converting a listed building into apartments, you should be realistic about how many units can be created. In some circumstances, a change of use may present an opportunity to enhance the heritage value of the building — for example, by strengthening its communal value through greater accessibility. In each case, the benefit of the proposed change must be balanced against any harm to the asset.”

1.3.3 **Local Planning Policy:**

Local planning policy is determined by Neath Port Talbot County Borough Council and is set out with the Council’s Local Development Plan (2011-2026) and associated supplementary planning guidance (SPG). The LDP sets out the Council’s Strategic Policies and Topic Based Policies. The following policies are considered relevant to the proposals contained in this application in relation to the protection and sustainable management of the historic environment within the County.

▪ **Policy SP21: Built Environment and Historic Heritage**

This policy states that:

"The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:

- 1. Encouraging high quality design standards in all development proposals;*
- 2. Protecting arterial gateways from intrusive and inappropriate development;*
- 3. Safeguarding features of historic and cultural importance;*
- 4. The identification of the following designated sites to enable their protection and where appropriate enhancement:*
 - (a) Landscapes of Historic Interest;*
 - (b) Historic Parks and Gardens;*
 - (c) Conservation Areas;*
 - (d) Scheduled Ancient Monuments; and*
 - (e) Listed Buildings and their curtilage."*

▪ **Policy BE2: Buildings of Local Importance**

This policy states that:

"Development proposals that would affect buildings that are of local historic, architectural or cultural importance will only be permitted where:

- 1. They conserve and where appropriate enhance the building and its setting; or*
- 2. It is demonstrated that the development could not reasonably be accommodated without affecting or replacing the building and the reasons for the development outweigh the heritage importance of the site."*

Paragraph 5.5.20 of the LDP states that:

"Across the County Borough, there are many examples of buildings that play an important part in defining the character of places, but that do not merit inclusion in the statutory list of buildings of architectural or historic importance."

Paragraph 5.5.21 of the LDP states that:

"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. Where possible, developments should aim to complement such buildings and incorporate and adapt them within schemes where appropriate."

▪ **SPG: The Historic Environment (April 2019)**

Paragraph 4.5.1 of the SPG states that:

"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."

With Paragraph 4.5.2 adding:

"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."

Paragraph 4.5.13 states, in relation to the application of Policy BE2, that:

"Policy BE2 (refer to Section 3.2) comes into effect when developments or changes are proposed that require planning permission under current regulations (it does not mean that any additional permission would have to be sought for changes that currently do not require it). The policy requires proposals that would affect a BLI to conserve and where appropriate enhance the building and its setting. This does not rule out change, such as alterations, extensions, changes of use and so on, but indicates that the Council will seek to conserve the character of the building or historic asset whenever possible."

Paragraphs 4.5.15 to 4.5.23 inclusive of the SPG sets out the Council's criteria for conserving and enhancing a BLI and its setting addressing a number of considerations including building character, building style and form, architectural detail, materials, demolition, adaption and modernisation as well as building setting.

▪ **SPG: The Historic Environment – Schedule of Buildings of Local Importance (April 2019)**

This document is a companion document to be read in conjunction with The Historic Environment SPG and sets out a building / historic asset description, selection criteria, justification for consideration and notes specific for each Building of Local Interest (BLI). Each BLI is given a unique reference number, and an accompanying photograph is included showing the building at the time that it was included on the list of BLIs.

Paragraph 4.5.9 of this document states:

“The management objectives for each building / asset should be taken to be the conservation and maintenance as far as practicable of the building as described and any features specifically mentioned here.”

1.4 OBJECTIVES OF THIS HERITAGE IMPACT ASSESSMENT

1.4.1 A Heritage Impact Statement is required to be submitted with any Listed Building Consent application and any Conservation Area Consent application.

Although this application neither relates to a statutorily listed building nor to a designated Conservation Area, Neath Port Talbot CBC have nevertheless stipulated their requirement for a Heritage Impact Assessment to be undertaken in respect to the proposed change of use at 43, Neath Road as a Building of Local Importance.

The objective of the Heritage Impact Statement is to establish and understand the historic development of the application site and its setting and provide an assessment of the heritage asset and its context in order to ensure any proposed works are undertaken and developed with an appropriate heritage-led approach.

Paragraph 5.12 of Planning Policy Wales – Technical Advice Note 24: The Historic Environment (May 2017) states that:

“Applicants for listed building consent are required to provide a heritage impact statement. This presents the results of a heritage impact assessment, which is a process designed to ensure that the significance of the building is taken into account in the development and design of proposals for change. Heritage impact assessment should be proportionate both to the significance of the listed building, and to the degree of change proposed, and the statement should provide enough information to allow the local planning authority to judge significance and impact when considering applications for listed building consent.”

Cadw’s document ‘Heritage Impact Assessment in Wales’ (May 2017) provides advice on preparing a Heritage Impact Statement and has been used as a guide in preparing this statement. The document sets out the general principles to consider when making changes to a historic asset and applying for Listed Building Consent, stating in Section 5 that:

“Your heritage impact assessment should take into account sufficient information to enable both the significance of the asset and the impact of the change to be understood...The basic stages of heritage impact assessment, whatever the size and scope of the project, are:

- 1. Explaining your objective and why the changes are desirable or necessary.*
- 2. Understanding the significance of your historic asset.*
- 3. Identifying your proposed changes.*
- 4. Assessing the impact of your proposed changes.*
- 5. Setting out the reasoning behind your preferred option, including design concepts and principles, in light of the assessment process.*

Once you are clear about stages 1 and 2, stages 3, 4 and 5 may be repeated until you find the best proposal that meets your objective and has the maximum benefit for your historic asset.”

1.5 STRUCTURE OF THIS HERITAGE IMPACT STATEMENT

1.5.1 In accordance with recommendations set out in Cadw’s document ‘Heritage Impact Assessment in Wales’ (May 2017) as noted above, this Heritage Impact Assessment is laid out in six main sections with an Executive Summary.

Section 3.0 ‘Project Objectives and Justification for Change’ seeks to set out the objective of

the project and explain why changes are desirable and necessary.

Section 4.0 'Understanding the Heritage' seeks to provide key information known about the application property – location and setting, use, age, statutory designations, outline history and heritage of the site.

Section 5.0 'Statement of Significance' seeks to provide an appraisal of the heritage significance of the application property based on the Evidential, Historical, Aesthetic and Communal Value of the heritage based on Cadw's Conservation Principles for the sustainable management of the historic environment in Wales.

Section 6.0 'Explanation of the Proposals' seeks to explain of the proposed changes to the historic asset and its context.

Section 7.0 'Impact Assessment of the Proposals' seeks to assess the impact of the proposals against the respective values and significances previously discussed and explored.

Section 8.0 'Justification in Support of the Proposals' seeks to set out the reasoning and justification behind the proposed works in the consideration of the assessment process carried out.

2.0

EXECUTIVE SUMMARY:

2.1

Summary statement:

Proposed Work	Change of use of first and second floor office accommodation into a seven bed House in Multiple Occupancy (HMO).
Your objective	To ensure that the underutilised upper first and second floors of the building supports a beneficial new use as a HMO to sustain the viability of the building through continued use, repair and maintenance.
Significance of affected fabric	The principal elevations of the building fronting onto Neath Road and Villiers Street make a positive contribution to the character of the area, reinforcing connections to the history and heritage of Briton Ferry. The building's external appearance remains substantially as originally built – particularly on its principal public / street facing elevations.
Assessing beneficial impact	To ensure the building is sustained in use and safeguarded for future generations.
Assessing harmful impact	Minor changes to the external appearance as a result of the proposed change of use and internal fit-out works to form the proposed seven bed HMO.
Proposed solution	External changes as a direct result of the proposed internal fit-out and refurbishment works shall be sympathetic to the appearance of the historic asset.

- 3.1 The project objectives focus on ensuring the sustainable viability and beneficial use of the upper floors at 43, Neath Road in order to safeguard its use, material fabric and the contribution the building makes to its setting for future generations to appreciate.
- 3.2 The Society for the Protection of Ancient Buildings (SPAB) notes in The SPAB Approach that:
"Building fabric is precious. A concern for its protection helps ensure that the essence of an old building survives for future generations to appreciate."
 The SPAB Approach, page 9 [www.spab.org.uk]
 The SPAB website (www.spab.org.uk/advice/reusing-old-buildings) also refers to the issue of reusing old buildings, stating that:
"Many historic buildings have well-established and appropriate uses. However, in some cases, a whole or partial change of use is required to ensure a structure's future; its sustainability, repair and protection."
 It has also been observed in Cadw's document 'Conservation Principles for the sustainable management of the historic environment in Wales' (March 2011) under the section heading 'Managing change to an historic asset' that:
"To ensure the long-term future of historic assets, change needs to be managed to ensure that their significance is not diminished as a consequence. Retaining the economic viability or the social functions of historic buildings will sustain and encourage their regular maintenance."
 In the book 'Understanding Historic Building Conservation' (M. Forsyth (ed) 2007), Michael Forsyth writes in Chapter 1 – The Past in the Future that:
"Conservation has as much to do with breathing life into new buildings as it has with repair. Nearly all buildings have evolved over their lifetime, adapting to the needs and uses of successive generations. Buildings decay when they are abandoned without a use, and their spirit dies when they become frozen in time as near museum pieces. Historically, buildings that lost their purpose disappeared and those buildings that are still with us have usually undergone frequent adaptation or changes of use. When buildings have a viable use, there is the incentive to repair and maintain the fabric, while old buildings deteriorate rapidly when neglected or empty."
- 3.3 The proposed change of use to the first and second floors at 43, Neath Road is considered to bring a new, sustainable and economically viable function to the underutilised existing office accommodation at the building in order to safeguard and protect the relevance of the historic asset for future generations which, in and of itself, supports the justification for the proposed change of use.

4.0

UNDERSTANDING THE HERITAGE:

4.1 LOCATION & SETTING

- 4.1.1 The address of the application site is:
43, Neath Road, Briton Ferry, Port Talbot, SA11 2DX



Figure 01: Aerial view of the town of Briton Ferry located on the east bank of the River Neath, within close proximity to the A48 and Junction 42 of the M4. The application site at 43, Neath Road is highlighted by the red circle.

Source: Google Earth (2024).

The site is located in the small town of Briton Ferry approximately two miles south of the town of Neath on the east bank of the River Neath, where it enters Swansea Bay. The site is located within the Unitary Authority of Neath Port Talbot County Borough Council.

OS Easting 274147 / OS Northing 193996 / OS Grid Reference SS741939.

The application property is located at the junction of Neath Road (A474) and Villiers Street on the east side of Neath Road. The property is located hard against the back of pavement and occupies a prominent corner plot.



Figure 02: Closer aerial view of 43, Neath Road (highlighted by the red circle) located at the junction of Neath Road and Villiers Street.
Source: Google Earth (2024).

As previously noted, 43, Neath Road is not a statutorily listed building by Cadw and neither is it located in a designated Conservation Area. Notwithstanding that, it is located in a setting within close proximity of several statutorily listed buildings and a number of buildings of local importance (of which it is itself designated as a BLI by Neath Port Talbot County Borough Council).



Figure 03: Site location plan showing the proximity of statutory listed buildings and buildings of local importance in the vicinity of the application site at 43, Neath Road (highlighted in red), which contribute to the character and context of the setting.

Source: Lloyd Britton (2024).

Cadw Statutory Listed Buildings:

1. 18, Neath Road – Grade II (Ref. No. 23309)
2. Rehoboth Baptist Chapel – Grade II (Ref. No. 23297)
3. Rehoboth Chapel Sunday School – Grade II (Ref. No. 23302)

Neath Port Talbot County Borough Council Buildings of Local Importance:

- A. 43, Neath Road (Ref. BFE001)
- B. Church of Our Lady of Assumption (Ref. BFE009)
- C. Former New Dock Hotel (Ref. BFE011)
- D. Former Post Office (Ref. BFE018)



Figure 04: Photograph of 18, Neath Road (Cadw Listed Grade II) built as a bank in the 1920s and later converted to offices. The reason for listing is given as *“Listed as a good example of a small classical building of the inter-war period, retaining original character, and for group value with the adjacent Rehoboth Chapel”*. Source: Lloyd Britton (2024).



Figure 05: Photograph showing the Rehoboth Baptist Chapel (left) and Rehoboth Chapel Sunday School (right) on the opposite side of Neath Road from the application site. Source: Lloyd Britton (2024).



Figure 06



Figure 07

Figure 06: Photograph of the front / street elevation of Rehoboth Baptist Chapel (Cadw Listed Grade II) – the chapel was founded in 1848 with the current building constructed in 1861. The reason for listing is given as *“Listed for its architectural interest as a well-designed C19 chapel retaining robust original character and detail, including a fine 1860s gallery”*. Source: Lloyd Britton (2024).

Figure 07: Photograph of the front / street elevation of Rehoboth Chapel Sunday School (Cadw Listed Grade II). As noted above, Rehoboth Chapel was established in 1848 and rebuilt in 1861. The present Sunday School was added in the early C20 and is now used as an all-purpose hall. The reason for listing is given as *“Listed for group value with Rehoboth Chapel”*. Source: Lloyd Britton (2024).



Figure 08: Photograph showing 43, Neath Road (left-hand side) in context with Rehoboth Baptist Chapel (right-hand side). Source: Lloyd Britton (2024).



Figure 09: Photograph showing the prominent corner elevation of 43, Neath Road – with Neath Road to the left and Villiers Street falling away to the right. The property is designated as a Building of Local Importance (Ref. BFE001) as a “*Well preserved building of character that forms a noticeable feature in the streetscape and provides evidence of Briton Ferry’s past commercial importance. Group value with former bank (Listed Building) and Post Office (BFE018) on opposite side of Neath Road*”.

Source: Lloyd Britton (2024).



Figure 10: Photograph showing a viewer street view of the prominent corner elevation of 43, Neath Road in context.

Source: Lloyd Britton (2024).



Figure 11: Photograph of 43, Neath Road viewed from Villiers Street, with 18, Neath Road and Rehoboth Baptist Chapel visible in the background.
Source: Lloyd Britton (2024).



Figure 12: Photograph of the Church of Our Lady of Assumption on Neath Road built in 1965, which is designated as a Building of Local Importance by Neath Port Talbot County Borough Council (Ref. BFE009) as a “Striking modern church in prominent location with an important community role”.
Source: Lloyd Britton (2024).



Figure 13: Photograph of the former New Dock Hotel, designated as a Building of Local Importance (Ref. BFE011) as a “*Surviving important hotel building reflecting commercial history of Briton Ferry*”.
Source: Lloyd Britton (2024).



Figure 14



Figure 15

Figures 14 & 15: Photographs of the former Post Office, designated as a Building of Local Importance (Ref. BFE018) as a “*A striking and prominent well-maintained post-office building. Group value with listed neighbouring Chapel and Bank buildings and BFE001 [43, Neath Road]*”.
Source: Lloyd Britton (2024).

4.2 USE

- 4.2.1 43, Neath Road is a former bank building (The Capital & Counties Bank Limited). The current use of the building is described as 'mixed use'. The ground floor of the building is occupied by a kitchen showroom / shop (Use Class A1 Shops) and this part of the building will remain unaffected by works proposed in this application.

The first and second floors of the building comprise of a number of individual offices (Use Class B1) and supporting accommodation (i.e. a tea-point / break-out space, toilet / welfare facilities and a boiler room).

The first floor comprises of 4 no. individual office spaces, 2 no. separate WCs, a communal tea-point / break-out space and corridor / stairwell / circulation space – refer to LBA drawing 0526_P02. The second floor comprises of 3 no. individual office spaces, boiler room and corridor / stairwell / circulation space – refer to LBA drawing 0526_P02.

4.3 AGE

- 4.3.1 An accurate age for the building has not been established, although it is assumed to be mid-19th century in origin (c.1850-1860), although further research into the historical record would be required to confirm this.

4.4 STATUTORY DESIGNATIONS

- 4.4.1 As previously noted, 43, Neath Road is not a statutorily listed building by Cadw and neither is it located in a designated Conservation Area. It is, however, scheduled as a Building of Local Importance (BLI) by Neath Port Talbot County Borough Council (Ref: BFE001) as recorded in the Council's Supplementary Planning Guidance documents The Historic Environment (April 2019) and The Historic Environment – Schedule of Buildings of Local Importance (April 2019) – a copy the BLI schedule is attached in Appendix A.

The schedule description for 43, Neath Road reads:

"Former bank premises at the junction of Villiers Street and Neath Road. Prominent two- and three-storey building with decorative frontages of dressed stone and lighter stonework features including window surrounds and distinctive ground floor banding."

The justification for consideration of the property as a BLI is given as:

"Well-preserved building of character that forms a noticeable feature in the streetscape and provides evidence of Briton Ferry's past commercial importance. Group value with former bank (Listed Building) and Post Office (BFE018) on opposite site of Neath Road."

The schedule confers architectural interest, historical / cultural association and group / settlement character value on the building.

4.5 OUTLINE HISTORY AND HERITAGE OF THE SITE

- 4.5.1 Briton Ferry is situated on the site of a historic river crossing point on the mouth of the River Neath, which dates back to Roman times.

An article on the 'Briton Ferry Estate' published on the JISC Archives Hub website (<https://archiveshub.jisc.ac.uk/search/archives/66fb7735-87e2-3cc9-9d9e-195c4a84ad86>) describes the transition of Briton Ferry from rural countryside to a heavily industrialised setting during the nineteenth century as follows:

"The Briton Ferry estate was initially an area of quiet rural uplands, rivers and deserted mudflats, but during the nineteenth century the industrialisation of the Swansea and Neath valleys and the advent of the railway from London to west Wales made the area highly attractive to companies who wished to take advantage of the improved transport system and the raw materials. Factories such as the Albion Steel Works, the English Crown Spelter Works and the Baglan Bay Tinsplate Works sprang up on low-lying ground towards the sea and new terraces were built to house the factory workers. In 1840 an area of about 750 acres of land in Cwmavon was leased for 99 years to John Vigurs and subsequently passed to Wright, Butler & Co. Ltd, then to Baldwins Ltd. The terraces of houses built on this land were sublet for the remainder of the term of this lease in 1897 and 1898. When the lease terminated in the 1930s many of the houses were declared unfit for habitation and were

either improved or demolished. As the railway initially attracted businesses, so the businesses in their turn created the need for more railways. The Rhondda & Swansea Bay Railway and the South Wales Mineral Railway both leased and bought land from the Briton Ferry Estate and the Great Western Railway Company continued to rebuild and expand their lines in the area. In the 1850s the newly formed Briton Ferry Floating Dock Company set the wheels in motion to build the Briton Ferry Docks, purchasing land from the Earl of Jersey. The company later went bankrupt and was taken over as a going concern by the Great Western Railway. In 1951 portions of the estate were sold to the Principality Property Co., Estateways Builders, John Oliver Watkins, the City & Provincial Housing Association and Gwalia Land & Property Developments Ltd.”



Figure 16: Extract from the 1888 Ordnance Survey map showing the site (highlighted by the red circle) set within the highly industrialised context of Briton Ferry at the time.
Source: Historic Wales (www.rcahmw.maps.arcgis.com) (2024).

It is in this context of rapid industrialisation and urbanisation that we see the expansion of Briton Ferry from a quiet rural backwater with a population of just 155 in 1782 to the bustle of heavy industry and commerce with a population of 4803 people in 1871. With the coal, copper, tin plate and iron came housing, shops, chapels and banks.

An article on the ‘Capital and Counties Bank’ published on the Wikipedia website (https://en.wikipedia.org/wiki/Capital_and_Counties_Bank) provides some history, context and background to the bank as follows:

“The Capital and Counties Bank was a London clearing bank, which operated 473 branches throughout the United Kingdom from 1877 until its acquisition by Lloyds Bank in 1918.

The bank was formed as the Hampshire and North Wilts Banking Company, following the merger of the Hampshire Banking Company and the North Wilts Banking Company. It was renamed Capital and Counties Bank in 1878. The Hampshire Banking Company was established in Southampton in 1834 and the North Wilts Banking Company in Melksham in 1835, from the private bank of Moule & Co. founded in 1792.”

The following undated historic photographs confirm the use of the building at 43, Neath Road as a branch of the Capital and Counties Bank. Interestingly, and as noted above, the Capital and Counties Bank operated under this name from c.1877-78, but the photographs show a date of establishment of 1834 to the front cornice, which is likely to be a reference to the establishment of the Bank's previous incarnation as the Hampshire Banking Company.

Whilst this doesn't help to accurately date the construction of the building at 43, Neath Road itself, it is considered likely that the structure dates from around the mid-19th century (c.1850-60), although this would require corroboration through further historic research.



Figure 17: Undated historic postcard / photograph of Villiers Street, Briton Ferry showing the application property on its prominent corner location.

Source: Flickr (www.flickr.com/photos/91650295@N04/with/29234537751/) (2024).



Figure 18: Extract of Figure 18 above – although difficult to discern, the words 'Established 1834' and 'Bank' can be seen to the façade of the building in this historic image. In this case, it is presumed that the bank itself was established in 1834 but this does not necessarily confer that the building at this site was built at this exact same date.

Source: Flickr (www.flickr.com/photos/91650295@N04/with/29234537751/) (2024).



Figure 19: Undated historic postcard / photograph of Villiers Street, Briton Ferry showing the application property on its prominent corner location.

Source: Flickr (www.flickr.com/photos/91650295@N04/with/29234537751/) (2024).



Figure 20: Extract of Figure 20 above showing signage for 'The Capital & Counties Bank Ltd Est'd 1834'. As noted above, it is presumed that the bank itself was established in 1834 but this does not necessarily confer that the building at this site was built at this exact same date.

Source: Flickr (www.flickr.com/photos/91650295@N04/with/29234537751/) (2024).

5.1 AN ASSESSMENT OF SIGNIFICANCE

- 5.1.1 Neath Port Talbot County Borough Council's Building of Local Importance (BLI) describes the building a *"Former bank premises at the junction of Villiers Street and Neath Road. Prominent two- and three-storey building with decorative frontages of dressed stone and lighter stonework features including window surrounds and distinctive ground floor banding"* and cites the 'Justification for Consideration' on the grounds of the historic asset being a *"well preserved building of character that forms a noticeable feature in the streetscape and provides evidence of Briton Ferry's past commercial importance. Group value with former bank (Listed Building) and Post Office (BFE018) on opposite side of Neath Road"* – refer to the BLI Description in Appendix A.

The heritage value, therefore, of any Building of Local Importance is conferred by its description and the justification attached to it. This is the case with 43, Neath Road its designation as a Building of Local Importance confirms it as a building that is *"considered to be important within the local context and therefore to be worthy of conservation"* (Paragraph 4.5.1 of NPTCBC's SPG: The Historic Environment (April 2019)).

Notwithstanding NPTCBC's BLI designation, which only serves to provide basic guidance as to the significance of the heritage asset, it is beneficial, therefore, to read past this and to analyse the significance of a historic asset from a number of different perspectives.

Significance can be defined as the product of a number of assessment criteria and Cadw's document 'Conservation Principles for the sustainable management of the historic environment in Wales' (March 2011), sets out how analysis of the significance of a historic asset can be assessed in terms of its evidential, historic, aesthetic and communal values. These individual values combine to inform the overall significance of a historic asset and allow for an informed understanding of where, what and how change can be managed to that particular historic asset through balanced, informed and considered decision making.

Paragraph 2.4 of the document states that *"understanding and articulating the values of an historic asset is necessary to inform the decisions about its future"*.

The document goes on to state that:

"The objective of understanding the heritage values of an historic asset and assessing its significance is to enable an authoritative statement of significance to be made and allow for the effects of proposed changes to be evaluated. This demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment."

Whilst it is acknowledged that 43, Neath Road is not a Cadw statutorily listed building, there is no reason not to utilise Cadw's assessment criteria for a Building of Local Importance given its rigour and rational.

5.2 EVIDENTIAL VALUE

- 5.2.1 *"This derives from those elements of an historic asset that can provide evidence about past human activity, including its physical remains or historic fabric...Additional evidential values can be gained from documentary sources, pictorial records and archaeological archives or museum collections"* (page 16 – Cadw's Conservation Principles).

5.3 HISTORICAL VALUE

- 5.3.1 *"An historic asset might illustrate a particular aspect of past life or it might be associated with a notable family, person, event or movement. These illustrative or associative values of an historic asset may be less tangible than its evidential value but will often connect past people, events and aspects of life with the present"* (page 16 – Cadw's Conservation Principles).

5.4 AESTHETIC VALUE

- 5.4.1 *"This derives from the way in which people draw sensory and intellectual stimulation from an*

historic asset. This might include the form of an historic asset, its external appearance and how it lies within its setting. It can be the result of conscious design or it might be a seemingly fortuitous outcome of the way in which an historic asset has evolved and been used over time, or it may be a combination of both” (page 17 – Conservation Principles).

5.5 COMMUNITY VALUE

- 5.5.1 *“This derives from the meanings that an historic asset has for people who relate to it, or for whom it figures in their collective experience or memory...Communal value might be commemorative or symbolic...Historic assets can also have social value, acting as a source of social interaction, distinctiveness or coherence; economic value, providing a valuable source of income or employment; or they may have spiritual value, emanating from religious beliefs or modern perceptions of the spirit of the place”* (page 18 – Conservation Principles).

5.6 CLASSIFICATION OF SIGNIFICANCE

- 5.6.1 For the purposes of this statement, a relative straight-forward and standard classification has been adopted using five levels of significance, which are sufficient to measure each aspect of significance in a relative and consistent manner.

High: An aspect of value that strongly contributes to the significance of an historic asset or place, which forms a key piece of its history and cultural value which may be of national or international importance. In material terms, these aspects will best contribute towards the historical values. Conservation will be a priority, and alteration is likely to be resisted unless it is demonstrated that significance will be greatly enhanced, reinforced or revealed as a result.

Medium: An aspect of value that will have some cultural importance (perhaps on a regional scale) and will make a moderate contribution to the significance of a place. In material terms, they will play an important role in conveying the heritage values. Efforts should be made to protect and enhance these aspects, though a greater degree of flexibility is possible than with aspects of high value.

Low: An aspect of value that will make a slight (yet still noteworthy) contribution to the significance of an historic asset or place, but perhaps only on a local scale. In material terms it will still add something to the heritage values (such as helping to maintain plan form and historic character), although this contribution may have been compromised by loss or uniformed interventions. A greater capacity for enhancement exists than for items of medium or high value, although a low designation does not necessarily mean that the feature is expendable.

Neutral: An aspect that has no discernible value that neither adds to or detracts from the significance of the historic asset or place. Informed change will be acceptable.

Detrimental: An aspect of the place that detracts from its values and therefore its significance. In material terms, removal or reversal of these aspects should be strongly encouraged.

5.7 OVERALL HERITAGE VALUE

- 5.7.1. **Evidential Value:** As previously noted, the application site at 43, Neath Road has an established history of its use as a bank. This is sufficiently well recorded – refer to Figures 17, 18, 19 and 20 above – and this is also recognised in the Building of Local Importance (BLI) designation of the building by Neath Port Talbot County Borough Council.

By the definition of classifications noted in paragraph 5.6.1 above, 43, Neath Road is considered to have Medium Evidential Value due to the general intactness / preservation / integrity of the principal (public) Neath Road and Villiers Street elevations, its contribution to its setting and its evidence of past commercial / industrial activity in the area.

- 5.7.2 **Historical Value:** The former bank building at 43, Neath Road is representative of the past commercial importance of Briton Ferry resulting directly from the rapid industrialisation of the region during the mid nineteenth century. This, coupled with the relatively unaltered and well-preserved building in its setting strengthens its historical value.

It is considered that 43, Neath Road has Medium Historical Value – albeit at a local rather

than a regional level – for its contribution to the understanding of a past way of life at this site and setting.

- 5.7.3 **Aesthetic value:** The Council's BLI description makes clear reference to 43, Neath Road having *"group value with former bank (Listed Building) and Post Office (BFE018) on opposite side of Neath Road"* and also being a *"well preserved building of character that forms a noticeable feature in the streetscape"*.

The BLI description also makes reference to the use of quality materials describing it as a *"building with decorative frontages of dressed stone and lighter stonework features including window surrounds and distinctive ground floor banding"*. It is clear from the design of its principal street fronting elevations, the quality of materials used and the level of craftsmanship exhibited, that the building has been conceived to be a prominent and civically important building within the street scene at the height of Briton Ferry's highly industrialised and commercial past and story in the mid to late-19th century.

The appearance and contribution of the building on the street-scene is essentially retained and remains legible and true to its original design – as a result, its continued contribution to the character of the area, that 43, Neath Road is considered to have Medium Aesthetic Value – albeit at a local rather than a regional level.

- 5.7.4 **Community value:** Communal Value derives from the meaning that an asset has for the people who relate to it, use it and remember it. The former bank building no longer has the same function of its original inception following the decline and de-industrialisation of the heavy industry and commerce that once defined Briton Ferry. Whilst the building may serve as a personal 'touchstone' for a dwindling few, any broader communal value or social contribution to the town is now derived from its physical fabric as a well-preserved building of architectural presence in the street scene and as a building of local importance for its reference to Briton Ferry's past industrial and commercial activity. This industrial and commercial activity no longer exists and is now consigned to history, which means that communal value is at risk of diminishing as people's direct personal experience and memory of the building as a bank is lost with the passing of time.

It is considered that 43, Neath Road has a Low Community Value as its direct social contribution to community life as a bank has been removed given that the context for its existence no longer exists. Although, undoubtedly, the building makes a positive contribution to the street scene and its setting, the former bank building now serves to provide communal value simply as a 'monument' to the past industrial and commercial legacy of Briton Ferry.

- 5.7.5 **Summary of overall heritage value:** In summary, the former bank at 43, Neath Road is considered to have Medium Heritage Value, albeit on a local as opposed to a regional or national level, which forms an important part of the local community's past industrial history and story with its relatively unaltered appearance, character and continued contribution to its setting and sense of place.

The significance of the asset derives not only from its *"group value with former bank (Listed Building) and Post Office (BFE018) on opposite side of Neath Road"* but also from its own evidential, historical, aesthetic and communal values.

The former bank at 43, Neath Road retains most of its original coherence and integrity. Therefore, maintaining the whole building in beneficial use is clearly a priority in order to protect and safeguard the longevity of this historic asset for the future.

6.0

EXPLANATION OF PROPOSALS:

- 6.1 **The Problem:**

As noted in Section 3.0 above, the project objectives focus on ensuring the sustainable viability and beneficial use of the upper floors at 43, Neath Road in order to safeguard its use, material fabric and the contribution the building makes to its setting. The importance of maintaining a historic asset in a viable and beneficial use is recognised and understood – where a building does not have value as a useable asset it risks falling into decline, disrepair and decay due to a lack of ongoing care and maintenance.

Whilst statutorily listed buildings are afforded protection in law, locally listed buildings are not protected in the same way. The existing first and second floor office accommodation is underutilised and is considered increasingly economically challenging in terms of maintaining appropriate levels of care and repair at the building with the associated financial demands a building of this nature derives. This is compounded by the general lack of demand for traditional office accommodation in a post-Covid world where hybrid and home working has changed the operating model for many small to medium sized businesses and companies.

The challenge, therefore, is to find a new economically viable and sustainable use for the first and second floor accommodation at 43, Neath Road.

The proposed change of use to the first and second floors at 43, Neath Road into a seven-bed house in multiple occupation (HMO) is considered to bring a new, sustainable and economically viable function to the underutilised existing office accommodation at the building. This, in turn, will fully utilise the building and contribute to safeguarding and protecting the relevance of the historic asset for future generations which, in and of itself, supports the justification for the proposed change of use.

6.2 Proposed Works:

The proposed works essentially comprise of internal fit-out and refurbishment works to create a seven-bed house in multiple occupation (HMO). New internal fit-out works predominantly consist of the construction of new internal partitions and interior sub-division to form the new bedrooms and ensuite bathrooms – refer to LBA drawing 0526_P02. This work will be carried out using lightweight stud partitions – fitting the new to the old – and will essentially comprise of reversible interventions which will not adversely impact on the interior of the building or adversely manifest themselves on the exterior of the building.

There are two interventions, however, that will manifest themselves on the exterior of the building.

The first of these interventions involves the refurbishment / reinstatement of fixed glazing to the bottom sash of a second-floor window – this window is located to the existing boiler room and has previously been adapted to include for slatted glass louvres in lieu of the original fixed glazing by a previous owner.



Figure 21



Figure 22

Figure 21: Photograph showing the location of the second-floor original box sash window (highlighted by the red circle) which has previously been adapted to include slatted glass louvres to the bottom sash (to the second-floor boiler room).

Source: Lloyd Britton (2024).

Figure 22: Closer view of the previously adapted window.

Source: Lloyd Britton (2024).

This window is located in Bedroom #7 in the proposed layout – refer to LBA drawing 0526_P02. The proposed works to this window shall include for carefully removing the slatted glass louvres and timber sub-frame and for reglazing the bottom sash of the window with single glazing to match the existing glass to the upper sash.

The second intervention that will manifest itself on the exterior of the building is the proposed reinstatement of a second-floor window on the internal courtyard elevation.



Figure 23: Photograph showing the existing blocked up second-floor window (highlighted by the red circle) which is proposed to be reinstated as part of the proposed works – refer to LBA drawing 0526_P04.

Source: Lloyd Britton (2024).

The proposed works to this window shall include for carefully removing the concrete block and render infill in order to reinstate the original structural opening (retaining the existing stone sill in-situ), for the installation of a new double-glazed white uPVC casement window and for making good to the window reveals and head to match the existing rendered finishes.

6.3 Proposed Drawings:

Drawings 0526_P01 (Site Location Plan), 0526_P02 (Plans – Existing & Proposed), 0526_P03 (Elevations – Existing) and 0526 (Elevations – Proposed) are submitted in support of this application. These drawings should be read in conjunction with this document.

7.0 IMPACT ASSESSMENT OF THE PROPOSALS:

7.1 Impact on the Exterior

- 7.1.1 The existing dressed high quality public façades fronting onto Neath Road and Villiers Street will remain essentially unaffected as a result of the change of use proposed at first and second floors (except for some minor alterations to reinstate the bottom sash of a second-floor window), which will not adversely impact the exterior of these principal elevations or diminish the building's significance as a Building of Local Importance.

Proposals to reinstate a previously blocked-up window opening at second floor to the internal courtyard elevation will similarly not adversely impact on the exterior of building. This reinstates an original window opening and will remain essentially anonymous and hidden from the public realm.

7.2 Impact on the Setting

- 7.2.1 As noted above, the proposed works will have no adverse impact on the exterior of the building – there are no significant changes proposed. The principal public elevations of the building fronting onto Neath Road and Villiers street will be retained as existing (subject to the small change to one box sash window as noted) and building's continued contribution to the character and context of its setting will therefore be retained and safeguarded.

7.3 Impact on the Interior

- 7.3.1 Few original features are retained at first and second floors at the building. Past fit-out works by previous owners have resulted in a rather bland 'functional' interior office aesthetic – including wood-chip wallpaper and wood veneer cladding to the walls. Where original features do exist – for example, timber newel posts, handrails and balusters to the central staircase, moulded timber skirting boards and architraves, timber panelled doors etc. – these will be retained in-situ.

New internal fit-out works predominantly include for new internal partitions and interior sub-division to form the new bedrooms and ensuite bathrooms. This work will be carried out using lightweight stud partitions – fitting the new to the old – and will essentially comprise of reversible interventions which will not adversely impact on the interior of the building or diminish the building's significance as a Building of Local Importance.

7.4 Impact on the Significance of the Asset

- 7.4.1 There should be little or no adverse impact on the significance of the historic asset as a result of the proposed change of use at first and second floors at the building.

8.0 JUSTIFICATION IN SUPPORT OF THE PROPOSALS:

- 8.1 Paragraph 4.5.13 of Neath Port Talbot County Borough Council's SPG: The Historic Environment states that:

"The policy [Policy BE2] requires proposals that would affect a BLI to conserve and where appropriate enhance the building and its setting. This does not rule out change, such as alterations, extensions, changes of use and so on, but indicates that the Council will seek to conserve the character of the building or historic asset whenever possible."

In keeping with both national and local planning policy, justification for undertaking the proposed change of use of the first and second floor accommodation at the building would appear to be clear and unequivocal in creating a new viable and economically sustainable

use which will assist with conserving, safeguarding and protecting this historic asset and Building of Local Importance for future generations. Small amendments to the external appearance of the building as noted above to two second floor windows will have no adverse impact on the character of the building. Indeed, it is considered that the proposed works to the box sash window, in particular, will enhance the building by removing the incongruous slatted glass louvres from the prominent corner elevation.

The proposed internal alterations adopt a conservation approach of 'minimal intervention', are reversible (by fitting the new works to the old) and do not adversely impact on the external appearance and character of the building or its setting.

In summary, it is considered that the proposed change of use at first and second floors (and associated works) conserve, if not enhance, the character of the historic building and its setting so as to be consistent and compliant with the policy aims of the Council in regard to works within the historic environment and, in particular, to Buildings of Local Importance.

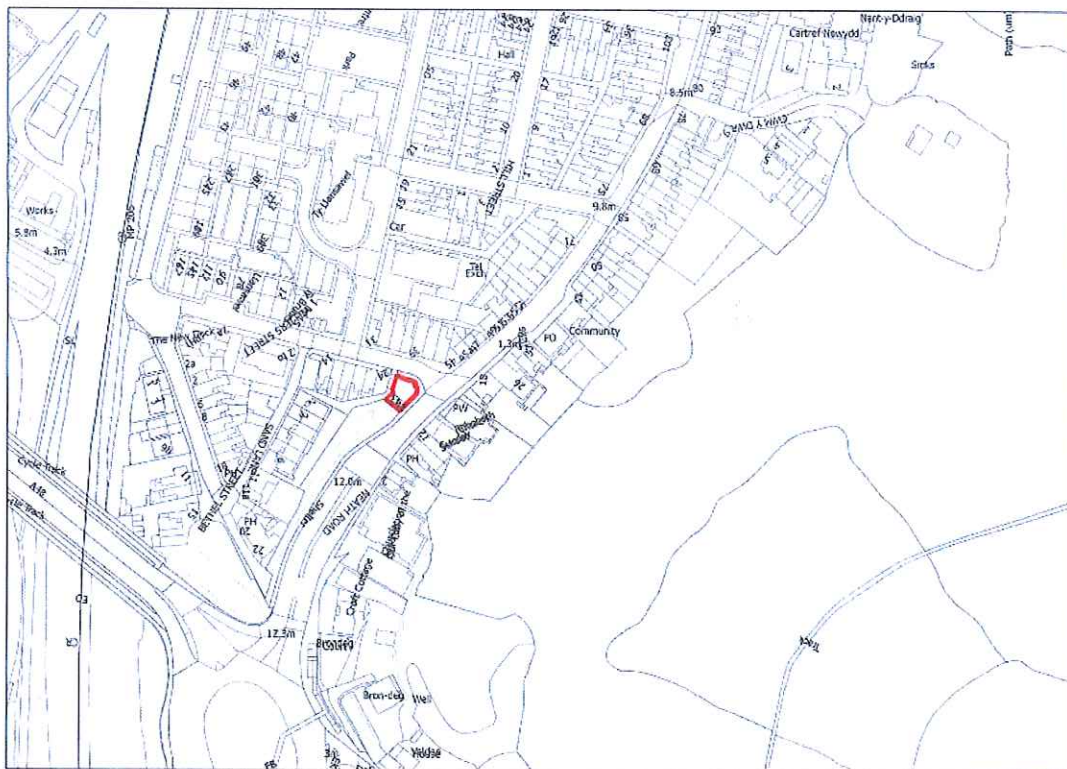


APPENDIX A: BUILDING OF LOCAL IMPORTANCE SCHEDULE

Briton Ferry East

Ward: Briton Ferry East	Settlement: Briton Ferry	Building Name: Former bank buildings	
Ref: BFE001	Validation Stage I ●	Stage II	Grid Reference: E274127 N194008
Address: 43 Neath Road			

Site Location Plan



Description: Former bank premises at the junction of Villiers Street and Neath Road. Prominent two- and three-storey building with decorative frontages of dressed stone and lighter stonework features including window surrounds and distinctive ground floor banding.



Architectural Interest	X	Historic Interest		Historical / Cultural Association	X	Group / settlement character Value	X	Old or Rare Local Buildings	
Justification for Consideration: Well preserved building of character that forms a noticeable feature in the streetscape and provides evidence of Briton Ferry's past commercial importance. Group value with former bank (Listed Building) and Post Office (BFE018) on opposite side of Neath Road.									
Notes:									