

Date: 3rd December 2024

Our Ref: S23.112

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Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT (AS AMENDED)
FULL PLANNING APPLICATION FOR CHANGE OF USE OF FLAT 8 (SECOND FLOOR) FROM CLASS C3(a)
(RESIDENTIAL DWELLING) TO CLASS B1 (OFFICES) WITH ANCILLARY STAFF ACCOMMODATION
EAGLE HOUSE, 2 TALBOT ROAD, PORT TALBOT SA13 1DH
PLANNING PORTAL REFERENCE: PP-12124192

Asbri Planning is appointed as planning agent to Tai Tarian Ltd in respect of the above planning application relating to a change of use from Class C3(a) to Class B1 use at Eagle House, 2 Talbot Road, Port Talbot, SA13 1DH. The change of use only relates to Flat 8, which lies on the second floor of the building.

The planning application has been submitted via Planning Portal and the submission documents are listed below.

Document Name	Prepared by/Reference
Application Forms	Asbri Planning Ltd
Covering Letter	Asbri Planning Ltd
Site Location Plan	KJG Architects
Proposed Site Plan	KJG Architects
Proposed Floor Plans (Ground, 1 st and 2 nd)	KJG Architects
Proposed Floor Plans Base (3rd, 4th & roof)	KJG Architects
Proposed Elevations.	KJG Architects

In addition, the application fee of £460.00 will be paid via telephone/BACS.

Application Site and Surrounding Context

The application site occupies a town centre plot in Port Talbot and formally comprised an existing two-storey building which is of a traditional stone construction under a pitched slate roof, with associated parking to the north of the building.

Notwithstanding, as outlined in further detail below within the planning history section, the site has received planning approval (LPA ref: P2021/0856) to demolish the existing building and the construction of a new four-storey building for commercial and residential use consisting of 18 affordable housing apartments on upper floors with office/commercial units at ground floor. These works are now well advanced and near completion with the external envelope of the building substantially complete and the internal fit out being undertaken.

Given the site's town centre location, the surroundings land uses are varied. The north and east of the site is bound by residential apartments. The Grand Hotel lies to the west of the site, and the Red Lion Pub lies directly opposite the site's

southern boundary. The site fronts onto the A48 (Talbot Road), a prominent A-Road which runs through the heart of Port Talbot.

A review of Natural Resources Wales' Development Advice Map (DAM) reveals the site lies within Zone C1. It is therefore considered to be served by significant infrastructure, including flood defences. The Flood Map for Planning shows that the site lies within Flood Zone 2 for Surface Water Flooding, and Flood Zone 3 (Rivers and Sea).

A review of Cadw's interactive mapping system revealed that the Plaza Cinema to immediate east of the site is Grade II listed, as well as Grove Place Chapel which lies to the north.

Access and Movement

The site is situated on the corner of Talbot Road (A48) and Oakwood Lane in the centre of Port Talbot. The A48 is one of the main arterial roads which runs through the heart of Port Talbot, linking the site directly to M4, which is approximately 1km to the east (westbound) or 1.5km to the north (eastbound).

The area is well served by public transport. Port Talbot Parkway train station lies directly opposite the site (70m) and provides direct access to Cardiff London and Swansea. Furthermore, Port Talbot's bus station serving the wider region lies 800m to the northwest. The site therefore lies in a highly accessible and sustainable location.

Pedestrian and vehicular access is taken via Oakwood Lane, which leads to the parking area and access point to the site.

Planning History

A review of the Authority's online planning register revealed the following planning history of relevance at the site:

- **P2021/0856** - the demolition of the existing 2 storey office building and the construction of 18 affordable housing apartments on upper floors with office/commercial units at ground floor and associated external works and parking area. Approved – 22nd December 2022.
- **P2012/0285** - change of use of public convenience e to Financial and Professional offices (A2), plus insertion of a window and doorway on rear elevation, erection of a bin storage area, extension to front boundary wall and new pedestrian gate. Conditional Approval - 11th May 2012.

As outlined above, recent planning history shows that the site has received approval to demolish the existing building with the construction of a new commercial/residential development. This can be considered positive in the context of this application, deeming the principle of residential use at the site acceptable with works commencing in terms of the implementation of this permission in May 2023.

Pre-Application Discussions

A pre-application enquiry was submitted to the Council on the 17th March 2023 and a written response was issued on the 13th May 2023 (ref: Q2023/0050). The key points to arise from the response were as follows:

- It is confirmed that the proposed change for unit 8 would be a material change of use to the approved C3 use and will require planning permission.
- The proposed use class for unit 8 is unclear and it depends on the services that would be provided by the staff.
- It is confirmed that no material change for the remaining 5 residential units on second floor.
- The proposed development is unlikely to raise objection from officers.

- A stand-alone application for the change of use of unit 8 is recommended when the building has been substantially constructed.

Proposed Development

The proposal seeks to provide supported living accommodation at Eagle House along with an ancillary administrative area, the latter will be regularised through a change of use application from Class C3(a) to Class B1. It must be noted that the change of use only relates to Flat 8 on the second floor of the building.

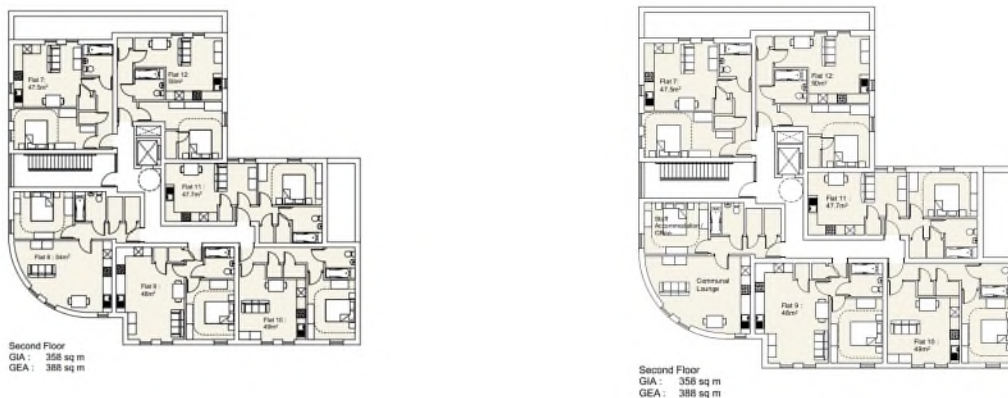
To provide background context, Tai Tarian recently gained full planning consent for the construction of 18 residential dwellings on the upper floors and commercial units on the ground floor at the application site (ref: P2021/0856). Since receiving approval, Tai Tarian have been in discussion with Neath Port Talbot CBC Social Services, Health & Housing regarding the potential to provide an element of supported living within the new development. The pre-application which was therefore submitted to the LPA stated a change of use from Class C3(a) to Class C3(b). However, it was confirmed in the pre-application response that there will be no material change of the use for the other 5 residential flats on the second floor, and a stand-alone application for the change of use of flat 8 is recommended.

On this basis, the second floor of the building will comprise an 'extra care scheme' which will operate via a tripartite agreement between Neath Port Talbot CBC, Tai Tarian Housing Association and the appointed care provider. Tai Tarian will be the Registered Social Landlord managing the accommodation requirements, Neath Port Talbot Council will be the commissioning body and the appointed care provider will manage the dedicated care provision on a day-to-day basis.

Neath Port Talbot CBC in cooperation with professionals and health colleagues will identify people that live in temporary or unsuitable long-term accommodation and then before placement, an inclusive engagement will be carried out with relatives of a potential tenant to ensure that the accommodation is suitable, as well as ensuring it meets that individual's personal ambition/development.

To facilitate the development, the scheme seeks to provide a flat/office for the support provider staff. As shown on the floor plan below, Flat 8 would become the support officer's base, and it would provide a communal area for tenants to benefit from personal interaction. The service will offer a 24-hour presence on site with targeted support as necessary. All other existing flats on the second floor will remain as per the current approved scheme in terms of their general layout. Minor internal reconfigurations are also proposed to ensure that the building is suitable for supported living accommodation, and the lift which allows for access to different floors will be restricted in terms of access to other floors to ensure that amenity is protected for all residents living within the building.

Figure 1: Existing (left) and Proposed (right) Floor Plan



No external alterations to the current building façade are proposed to facilitate the development.

In respect of car parking, Eagle House (the site) benefits from a private car park consisting of 19 spaces in total. Of the 19 spaces, 13 are specifically allocated for the commercial units on the ground floor, whilst the remaining 6 are allocated to existing residents within the building. Therefore, given the nature of the use combined with the site's location in very close proximity to Port Talbot Town Centre, the intention is to make use of the site's sustainable credentials by offering a car-free development in line with both Future Wales and PPW's broad objectives, which is supported by the Council Provider's Active Travel Management Plan.

Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
- Neath Port Talbot Council Local Development Plan (adopted 2016).

In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 11 (February, 2021), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
- Neath Port Talbot Council Supplementary Planning Guidance.

This section of the Planning Statement provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this application. For ease of reference, this overview is set out below at the national and local level.

National Level

The Well-Being of Future Generations (Wales) Act 2015

The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires “*public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle*”. The Act sets out seven ‘well-being’ goals as follows:

- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
- A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).

- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

Within the Act, sustainable development is defined as follows: *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

National Development Framework: Future Wales – The National Plan 2040

The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. ‘Future Wales’ sets out the Welsh Government’s strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.

Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years’ time, as follows:

A Wales where people live:

1. *...and work in connected, inclusive and healthy places*
2. *...in vibrant rural places with access to homes, jobs and services*
3. *...in distinctive regions that tackle health and socio-economic inequality through sustainable growth*
4. *...in places with a thriving Welsh Language*
5. *...and work in towns and cities which are a focus and springboard for sustainable growth*
6. *...in places where prosperity, innovation and culture are promoted*
7. *...in places where travel is sustainable*
8. *...in places with world-class digital infrastructure*
9. *...in places that sustainably manage their natural resources and reduce pollution*
10. *...in places with biodiverse, resilient and connected ecosystems*
11. *...in places which are decarbonised and climate-resilient*

Planning Policy Wales Edition 12

Planning Policy Wales (PPW) Edition 12 was published in 2024. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.

Sustainable Development is defined at Page 7 of PPW as follows: *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”*.

PPW sets out that *“Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated”*.

PPW emphasises that good design is fundamental to creating sustainable places whilst previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.

PPW notes *“Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport”*.

It is highlighted that *“planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor’s surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.”*

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. PPW and Future Wales set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

Technical Advice Notes

PPW 11 is supported by 19 Technical Advice Notes (TANs) which provide more detailed guidance on a variety of issues. In respect of this application, the following TANs are considered relevant:

- Technical Advice Note 18: Transport (March, 2007).

Adopted Neath Port Talbot Council Local Development Plan

The Neath Port Talbot Council Local Development Plan was adopted in 2016 and is the prevailing development plan for the County. The application site lies within the defined settlement boundary and is subject to no ecological or environmental constraints.

Figure 2: Neath Port Talbot LDP Proposals Map



The following LDP policies are considered relevant in the context of the proposed development:

Policy Reference	Relating to
<i>Strategic Policies</i>	
SP1	Climate Change
SP2	Health
SP3	Sustainable Communities
SP7	Housing Requirement
<i>Detailed Policies</i>	
SC1	Settlement Limits
TR2	Design and Access of New Development
BE1	Design

Supplementary Planning Guidance

The following adopted supplementary planning guidance are considered relevant to the proposal:

- Parking Standards (adopted October, 2016).

Planning Appraisal

As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.

The key planning considerations that would arise from the proposed development are as follows:

- Principle of Development;
- The Impact on Visual and Residential Amenity;
- Highways and Parking.

Principle of Development

The site lies wholly within the defined settlement limits of Port Talbot, which is the preferred location for development. Furthermore, PPW outlines that previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.

In the overall context of the proposed development, application P2021/0856 permitted the demolition of the existing 2 storey office building and the construction of 18 affordable housing apartments on upper floors with office/commercial units at ground floor and associated external works and parking area. The current application merely seeks to approve a minor variation to one of the consented apartments with the overall scheme largely unaffected in terms of overall use and appearance.

The proposal comprises a change of use of Flat 8 on the second floor only from a Residential Dwelling (Class C3(a)) to Offices (Class B1) with ancillary staff accommodation. As such, it must be acknowledged that the prevailing residential use will remain in situ for the entire building apart from Flat 8. The proposal has been subject to positive pre-application discussions with the Local Planning Authority (ref: Q2023/0050). No in principle objection was raised in respect of the principle of the change of use, therefore the principle of development can be considered acceptable.

Further to above, strategically the application site is well suited for the proposed use given its town centre location in close proximity to public transport links and local amenities, which are all key factors to the proposed use in order to allow tenants to have easy access to the community and support networks. It is therefore considered that the proposed development will deliver a positive investment that accords with relevant LDP Policy.

The Impact on Visual and Residential Amenity

The proposal comprises the change of use of a singular apartment within the Eagle House building from C3(a) to B1 to with ancillary staff accommodation. The proposal includes no alterations to the existing elevations or increase in floor area. The internal configuration of the property will be slightly altered provide an associated administration area for supporting services. It is therefore considered that any internal reconfiguration can be accommodated with no detriment to the privacy and amenity of surrounding properties. As such the proposal is considered to be in accordance with Policy SP3 (Sustainable Communities) and BE1 (Design) of the Neath Port Talbot LDP.

Highways and Parking

The application site is well positioned off the A48 (Talbot Road) in Port Talbot town centre. It is well served by public transport where the train station and bus station are located immediately adjacent to the west of the application site. It is considered that a number of staff members will be locally based, as such given the site's location in close proximity to public transport links, sustainable methods of travel to work can be encouraged.

One of the key principles of the proposal is to make use of the site's sustainable credentials via the delivery of a car free development. Aforementioned the site is within a short-walk of various services and facilities associated and the bus/train station are both within 800m of the site, underlining the site's accessibility to key public transport links. Therefore, no car parking will be provided and alternatively, bicycle parking can be provided for staff to encourage sustainable methods of travel.

In accordance with the above, the proposal is considered to comply with Policy SP3 (Sustainable Communities) and TR2 (Design and Access of New Development) of the LDP.

Conclusion

This application has been prepared on behalf of Tai Tarian Ltd to accompany a full planning application for the change of use of Flat 8 from Class C3(a) (Residential Dwelling) to Class B1 (Offices) with ancillary staff accommodation at Eagle House, 2 Talbot Road, Port Talbot, SA13 1DH.

The site lies within the settlement boundary of Port Talbot. It is identified as a highly sustainable and accessible area due to its location within the town centre and in proximity to the A48 (Talbot Road). Given the proposal constitutes a minor change of use relating to an approved development, the principle of developing the site for the purpose proposed is therefore considered acceptable, which has also been established through pre-application discussions with the Local Planning Authority.

The proposal fully accords with adopted LDP policies. Furthermore, it will not give rise to any significant adverse impacts upon visual and residential amenity or highway safety.

In light of the above, it is concluded that the proposal fully accords with both national and local policies and there are no material considerations which should prevent the planning application from being determined in accordance with the relevant planning policy framework. In this respect, it is respectfully requested that Neath Port Talbot Council consider this application favourably and grant planning permission for the proposal.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Glenn Lee', written in a cursive style.

Glenn Lee

Planner - Asbri Planning Ltd