

Robert Bowen Planning and Development Ltd

Our ref:

Your ref: P2024/0322

Date: 23/12/2024

Mr. C Morris
Head of Planning
NPTCBC
Brunel Way
Briton Ferry
Port Talbot

RE: 15 Bethel Street Briton Ferry, Neath, SA11 2HQ

**Change of use from single dwelling Class C3 to 5-bedroom HMO Class C4 and
construction of single storey rear extension**

Dear Sir,

Please find attached a revised application in respect of the above site. Application P2024/0322 was refused on the 6th November 2024 for the following reasons.

The proposed development by reason of the proposed layout would result in the creation of a HMO with two ground floor bedrooms where neither the future residents nor the applicant would have control over safeguarding light and outlook from the only windows to serve the bedrooms, thereby resulting in an inadequate level of residential amenity to bedrooms 1 and 2, to the detriment of the residential amenity and well-being of the future occupiers of these rooms. It is therefore considered that the proposed development would fail to demonstrate high quality design and would be contrary to policy BE1 of the Neath Port Talbot Local Development Plan and would not accord with the guidance within the Council's SPG: Design and Planning Policy Wales (Edition 12).

The proposed development would result in an increase in pressure upon the existing limited on-street car parking provision available within Bethel Street, resulting in an increase in potential conflict and further indiscriminate on-street parking to the detriment of the free flow of traffic and highway and pedestrian safety and would be

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contrary to policy TR2 of the Neath Port Talbot Local Development Plan.

The proposed development would fail to provide adequate flood management through the provision of a substandard Flood Safe Refuge Area to serve the occupiers of the three proposed ground floor bedrooms resulting in an increase in the number of people at risk and would be contrary to the guidance within TAN 15: Development and Flood Risk.

The application has been revised as follows to address the Council's concerns

Reason 1 (Residential Amenity)

The application has been revised to provide secondary windows to bedrooms 1 and 2. This will ensure an adequate standard of amenity for occupiers. Whilst the Council's concerns over the previous application are noted, it is considered that windows overlooking third-party land are unlikely to be obscured as they overlook vehicle access to adjacent garages which must remain unobstructed.

Reason 2 (Parking)

In support of the application the applicant has provided a sustainability assessment as set out in the adopted supplementary planning guidance. Before taking into account the lower car ownership associated with such development the sustainability assessment identifies a negligible increase in on street car parking which is unlikely to have a detrimental effect on the highway to pedestrian safety over and above the existing lawful use.

Reason 3 (Flooding)

The previous application was refused for flooding reasons despite NRW offering no objection as there was no change in the vulnerable status of the site. In response to the Council's reason for refusal the applicant has increased the available space for a safe flood refuge area. Whilst the Council's concerns are recognised it should be noted that there is no minimum adopted standard for a flood refuge area with NRW guidance or the current Building Regulations. Moreover, a suitable flood management plan should ensure safe and speedy access before the ingress of water. This is considered

achievable given that there is a flood free area approximately 10m south-east of the application site.

Yours faithfully,

Robert Bowen.