

1.0 INTRODUCTION

- 1.1 This Transport Statement has been prepared by John Russell Transport Planning Ltd. on behalf of Signal RP I Ltd (Port Talbot) ('the Applicant'). It is prepared in support of a planning application which seeks to change the use of Unit B of Aberafan shopping centre ('the Site'), from a retail store (land use class A1) to a 24/7 Gym (land use class D2) ('the Proposed Development'). No changes to the gross floor area are proposed. No changes to the existing means of access to the building are proposed. Users of the Proposed Development will have the same access to car parking as users of existing use at the Site.
- 1.2 The location of the Proposed Development is illustrated on Figure 1.1 which places it in its spatial context.

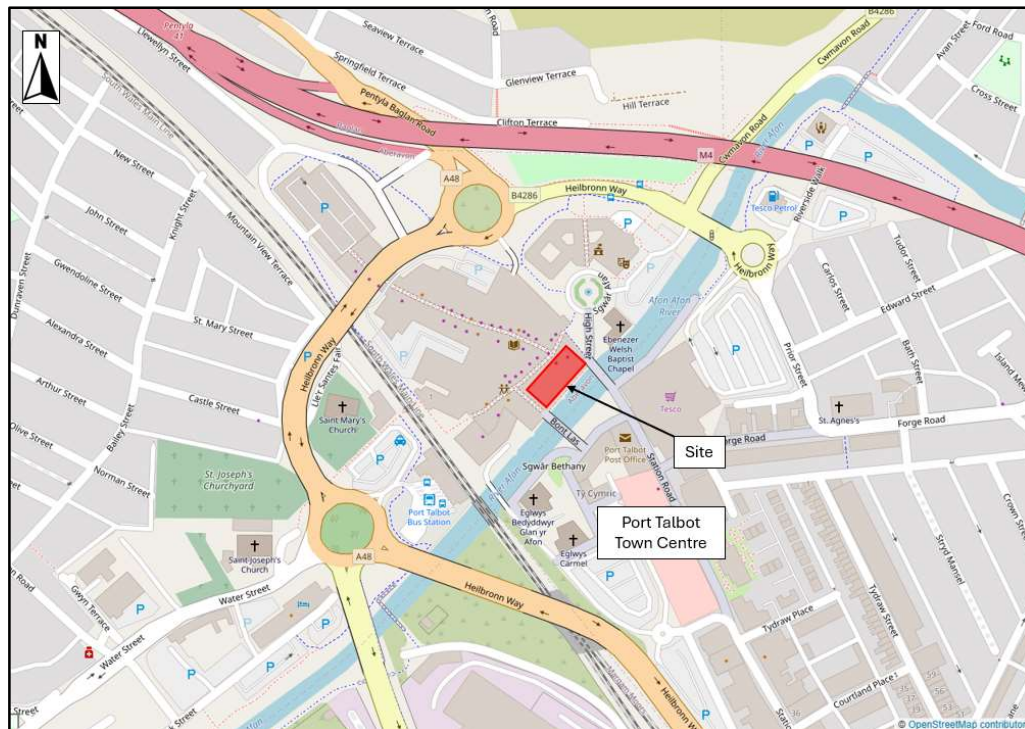


Figure 1.1 - Site Location

- 1.3 Following this introduction, this Transport Statement is split into 5 sections as follows:
- Section 2 outlines the transport planning policies that are considered to be relevant to this application;
 - Section 3 assesses the existing level of accessibility;
 - Section 4 provides an overview of the proposed development and details of the proposed access, parking and servicing arrangements; and

- Section 5 considers the potential trip generating and car parking demand impacts that could arise from the Proposed Development and provides an overview of the impacts these are likely to have.

- 1.4 Section 6 provides a summary and conclusion for information presented in the TS which is that there are no transport or highway reasons for withholding or refusing planning permission for a change of use at the Site.

2.0 TRANSPORT POLICY

Planning Policy Wales

- 2.1 Planning Policy Wales (PPW) sets out the Government's national planning policies for Wales and how these are expected to be applied. The Planning Policy Wales document was originally published in 2002 and has since been revised, most recently in February 2024.

- 2.2 With regards to transport, paragraph 4.1.1 states that:

"the planning system should enable people to access jobs, services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport. By influencing the location, scale, density, mix of uses and design of new development, the planning system can improve choice in transport and secure accessibility in a way which supports sustainable development..."

- 2.3 Paragraph 4.1.4 reiterates the need, inter alia, to integrate land use planning and transport measures and this theme is reinforced in subsequent policies.

- 2.4 Paragraph 4.1.9 notes that:

"The Welsh Government is committed to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport".

- 2.5 Policy 4.1.10 emphasises the role that the planning system has in delivering sustainable travel outcomes stating:

The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:

- *are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
- *are designed in a way which integrates them with existing land uses and neighbourhoods;*
and
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling*

2.6 Paragraph 4.1.12 furthers the sustainable transport initiative and states that:

"It is Welsh Government policy to require the use of sustainable transport hierarchy in relation to new development which properties walking, cycling and public transport ahead of private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to place in the decarbonisation of transport, particularly in rural areas with limited public transport services".

2.7 With regards to public transport, paragraph 4.1.37 states:

"Planning authorities must direct development to locations most accessible by public transport. They should ensure that development sites which are well served by public transport are used for travel intensive uses, such as housing, jobs, shopping, leisure and services, reallocating their use if necessary."

2.8 In determining planning applications PPW sets out that planning authorities must ensure that development proposals:

- through their design and supporting infrastructure, prioritise provision for access and movement by walking and cycling;
- provide appropriate levels of secure, integrate, convenient and accessible cycle parking and changing facilities;
- provide electric vehicle charging points as part of the overall design of a development; and
- take a design-led approach to the provision of car parking, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development.

Technical Advice Note 18

2.9 Technical Advice Note (TAN) 18: Transport (2007) supplements PPW and details wider sustainable development policy objectives which includes:

- Ensuring new development is located where there is, or will be, good access to public transport, walking and cycling thereby minimising the need for travel and fostering social inclusion;
- Managing parking provision;
- Promoting cycling and walking and support the provision of high quality, inclusive public transport;
- Encouraging the location of development near other related uses to encourage multi-purpose trips;
- Supporting provision of a reliable and efficient freight network; and
- Ensuring that transport infrastructure or service improvements necessary to serve new development allow existing transport network to continue to perform their identified functions.

- 2.10 In particular TAN18 requires that land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport through influencing the location, scale, density and mix of land uses and new development.

Neath Port Talbot Local Development Plan 2011 - 2026

- 2.11 The Neath Port Talbot Local Development Plan ('the Plan') provides a clear vision for the County Borough setting out where, when and how much new development can take place over the period 2011-2026.
- 2.12 Section 5.4 provides guidance regarding transport and access matters, with Policy TR2 specifically focussed on new development and stating:

Development proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 1. The development does not compromise the safe, effective and efficient use of the highway network and does not have an adverse impact on highway safety or create unacceptable levels of traffic generation;*
- 2. Appropriate levels of parking and cycling facilities are provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use;*
- 3. The development is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes;*
- 4. Transport Assessments and Travel Plans are provided for developments that are likely to create significant traffic generation.*

- 2.13 In essence, proposals are required to be accessible by a variety of means, not just the private car, in order to reduce the number of shorter journeys taken by car and contribute towards the Plan's aim to provide a sustainable and more integrated transport network.

Parking Standards Supplementary Planning Guidance

- 2.14 Car parking guidance is provided in the Parking Standards Supplementary Planning Guidance ('Parking SPG') which was adopted in October 2016. The Parking SPG takes a zonal approach to recommending car parking provision, in line with the Wales Parking Standards.
- 2.15 The Site is located within Zone 2 (See Parking SPG, Appendix A, Plan 13) which is defined as "Town Centre or City Centre Fringe". Parking provision guidance is provided for specific land uses within each zone, recognising the differing levels of transport accessibility. The guidance takes the form of maximum recommended parking provision.

- 2.16 With regards the extant, lawful use at the Site, Section 4.3 of the Parking SPG recommends a maximum of 1 space per 14m² of operational floorspace. Note 1 to Section 4.3 notes that the non-operational floor space is assumed to be 75% of the total floor area.
- 2.17 Section 4.8 provides guidance on maximum car parking provision, inter alia, for Fitness clubs, recommending 1 space per 10m² of non-operational floor space.

Summary

- 2.18 On the basis of the above review, it is evident that the location of a site in relation to sustainable modes of transport is a key consideration when assessing the acceptability of a proposal. Once sustainable travel options have been fully explored and recognising that there will still remain residual journeys made by car, appropriate provision should then be made for car parking.

3.0 BASELINE CONDITIONS

Existing site information

- 3.1 The Site comprises an existing non-food retail unit amounting to 1,958 GIA, located at the first-floor level of the Aberafan Shopping Centre.
- 3.2 The location of the Site in the context of the local transport network is illustrated in Figure 3.1 below.



Figure 3.1 – Site Context

- 3.3 The figure above illustrates that the Site is located within Port Talbot town centre. It therefore has the potential for a significant number of trips to be undertaken by non-car means. Furthermore, it can be expected that many visits to the Proposed Development would form part of a linked trip to other town centre destinations, which would serve to reduce the number and length of journeys undertaken.

Walking and cycling

- 3.4 The importance of walking and cycling in contributing towards sustainable travel patterns is recognised within the transport policy relevant to the Proposed Development.
- 3.5 Situated within Port Talbot town centre and adjacent to the civic quarter, the Site is located within a network of pedestrian and cycle routes connecting the Site to surrounding communities and facilities as well as the remainder of the town centre.
- 3.6 There is therefore the potential for walking and cycling to form genuine alternatives to car travel.

Public Transport

Journeys by Bus

- 3.7 As illustrated on Figure 3.1, the Site is within a 400m walk of Port Talbot Bus Station. The bus station has eight stands together with an accessible stand and a marked layover area for six buses / coaches.
- 3.8 There is a wide range of local bus services operating from the bus station covering all local areas. In addition, coach services operating from the bus station connect Port Talbot to regional and national destinations.
- 3.9 There is therefore the potential for bus / coach travel to form genuine alternatives to car travel.

Journeys by Rail

- 3.10 The Site is located within an 800m walk of Port Talbot Parkway (PTP) railway station, which lies to the southeast of the Site.
- 3.11 Train services operated by GWR and Transport for Wales from PTP connect Port Talbot to a variety of destinations including Cardiff, Pembroke Dock, Swansea, Fishguard Harbour, Manchester Piccadilly, Carmarthen, Milford Haven, London Paddington and stations in between.
- 3.12 There is therefore the potential for train travel to form a genuine alternative to car travel.

Vehicular Access and Highways

- 3.13 The figure below illustrates the main vehicular access points and routes in relation to the Site.

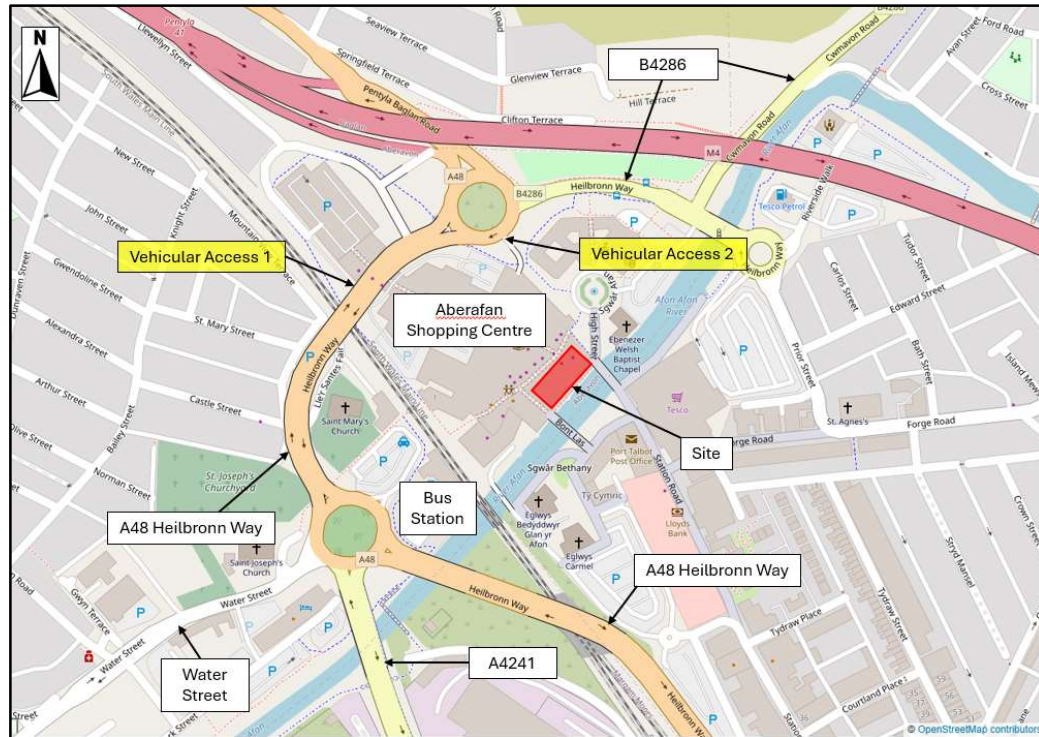


Figure 3.2 – Vehicular Access

3.14 Vehicular access to the Site is restricted to operational traffic only with security measure in place to prevent general access. Referring to the figure above, the main vehicular access points to the Site comprise:

- Access 1 - from the A48 Heilbronn Way / Llewellyn Street via a dedicated link road. This access leads to a limited number of staff car parking spaces and a service yard for delivery vehicles servicing the ground floor of the Aberafan Shopping Centre; and
- Access 2 - directly from the A48 / B4286 roundabout. This access is primarily for use by delivery / service vehicles and leads to a service yard at first floor level for units, such as the Site, located at first floor level.

3.15 In terms of access routes, the primary means of access is via the A48, which is a two-lane dual-carriageway in the vicinity of the Site. The A48 forms a distributor road around the western half of the Aberafan Shopping Centre, connecting to the M4 (serving regional and national destinations) and the B4286 to the north and several local roads and streets to the west and south including Water Street and the A4241.

Existing Car Parking

3.16 There is no designated car parking associated with the extant use. Instead, visitors benefit from a variety of publicly available car parks located within a short walk of the Site, which serve the wider town centre uses. The locations of these are illustrated on Figure 3.2 and summarised in Table 3.1.

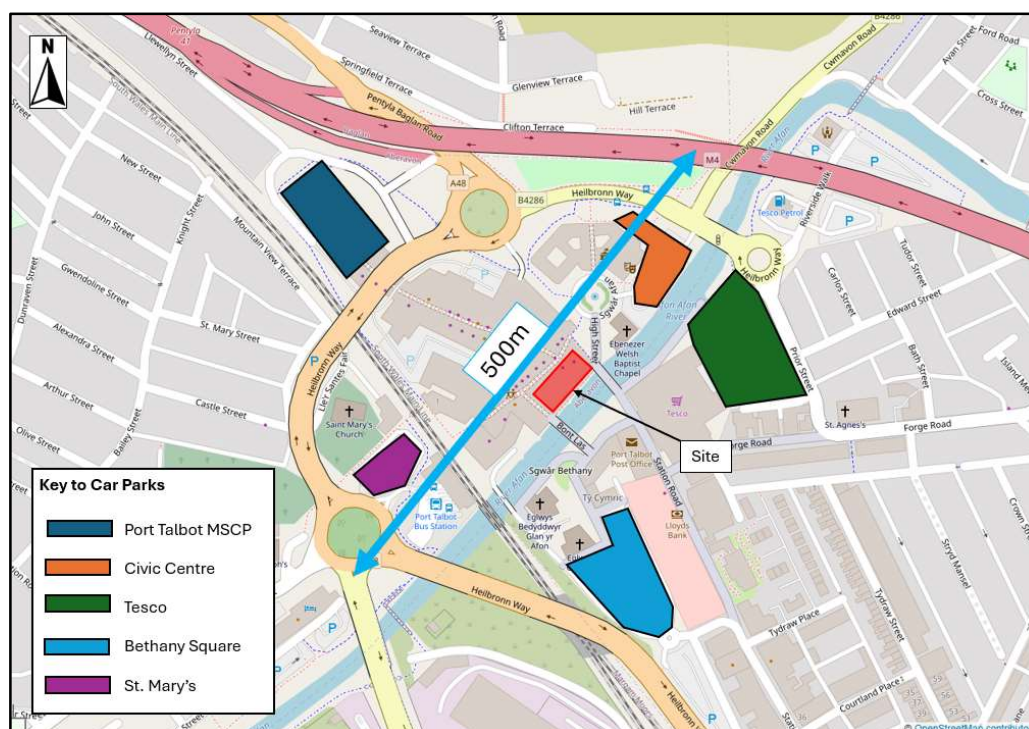


Figure 3.3 – Public Car Parking Availability

Car Park	Walk Time to Site	Spaces	Opening Hours	Charges
Tesco	3 minutes	c.242	24 hour	2 hours free car parking
Civic centre	2 minutes	80	24 hour	£1.75 for 1-hour upto £3.80 all-day
Port Talbot MSCP	7 minutes	705	7.00am to 7.30pm	£1.75 for 1-hour upto £3.80 all-day
St. Mary's Car Park	5 minutes	41	24 hour	£1.75 for 1-hour upto £3.80 all-day
Bethany Square	5 minutes	166	24 hour	£1.75 for 1-hour upto £3.80 all-day

Table 3.1 – Car Parking availability

- 3.17 The table above demonstrates that there is over 1,200 publicly available car parking spaces within a short walk of the Site. Of these, circa 500 are available for use on a 24 hour basis.
- 3.18 There is no cycle parking specific to the extant non-food retail use but again, there is cycle parking provision for visitors in and immediately around Aberafan Shopping Centre as well as provision within the nearby public car parks. In addition, long stay cycle parking for staff is catered for within individual units within the Aberafan Shopping Centre.

4.0 PROPOSED DEVELOPMENT

Overview

- 4.1 The Proposed Development comprises a change of land use at the Site from a retail store (land use class A1) to a 24/7 Gym (land use class D2). No changes to the gross floor area or access arrangements are proposed.

Access Arrangements

Pedestrian and Cycle

- 4.2 During the opening hours of the Aberafan Shopping Centre, pedestrian access to the Site will be via the shopping centre.
- 4.3 Visitors arriving by cycle will park within the existing shopping centre cycle parking facilities and access the Site on foot via the shopping centre.
- 4.4 The Proposed Development will operate on a 24-hour basis. A separate access for visitors arriving outside of the shopping centre opening times is provided comprising the option of stairs or lift to reach the Proposed Development, which is at first floor level. Members will gain access via secure pass.

Vehicular Access - Visitors

- 4.5 Visitors arriving by car will utilise the available car parking located within walking distance of the Site. Direct access to the Site will be gained on foot as described above.

Vehicular access - servicing and refuse collection

- 4.6 Service vehicles and refuse collection vehicles will gain access via the A48 / B4286 roundabout (Vehicular Access 2 as illustrated on Figure 3.2) and utilise the service yard located at first floor level adjacent to the Site.

Parking

Car Parking

- 4.7 As the Proposed Development replaces an existing retail use that will cease to exist, no new car parking is proposed as part of the Proposed Development.
- 4.8 Visitors will be able to utilise nearby publicly available car parking in the same way that customers of the existing retail store at the Site do.

Cycle Parking

- 4.9 Similarly, no new cycle parking is proposed as part of the Proposed Development. Again, visitors will be able to utilise nearby publicly available cycle parking in the same way that customers of the existing retail store at the Site do.

5.0 CHANGES IN TRAVEL PATTERNS

- 5.1 This section considers the relative change in trips arising from the Proposed Development having regard to the extant, lawful use at the Site, and the potential impacts which may arise.
- 5.2 It is noted that the Site forms part of a wider retail / entertainment area and that therefore many visitors to the Site will have multiple journey purposes eg a linked trip with a visit to the gym and the supermarket. However, for the purposes of comparing the relative change in travel demand, the extant and proposed uses are considered as standalone entities.

Travel Demand

Existing land use

- 5.3 The Site comprises a retail unit which was most recently occupied by the Wilko retailer with the building comprising a total gross internal area (GIA) of circa 1,958m².
- 5.4 Typical traffic generation rates for non-food retail stores of a similar size to the Site are presented in the table below together with the resulting traffic generation for the extant non-food store.

Time Period	Trip Rates ¹ (per 100sqm floorspace)			Trip Generation (1,958 sqm floorspace)		
	Arr.	Dep.	Two-way	Arr.	Dep.	Two-way
AM peak hour (08:00-09:00)	0.146	0	0.146	3	0	3
PM peak hour (17:00-18:00)	0.839	1.058	1.897	16	21	37

Table 5.1 – Traffic generation arising from extant use of the Site

- 5.5 The table above shows that a non-food retail store located at the Site is likely to attract a 37 vehicle trips during the weekday, evening peak hour.

Proposed Development

- 5.6 The Proposed Development comprises a 24/7 members only gym. During the hours of 08:00 and 22:00 Monday-Friday and 08:00 and 16:00 Saturday-Sunday, the Proposed Development will be staffed. Outside of these hours, members will gain entry via a secure pass.

¹ Source: permitted development at Unit 2 Parc Paza, Waterton Crooss, Bridgend. Planning permission reference P/23/499/RLX

- 5.7 Unlike many other land uses, there is only a loose connection between floor area and the number of users of a gym. The number of users of a gym is more influenced by a combination of:
- Equipment;
 - Classes;
 - Environment / facilities; and
 - Membership arrangements / cost.
- 5.8 The above factors vary from gym to gym, even within the same group of gyms. Hence trip attraction to a planned gym needs to be considered on a site-by-site basis.
- 5.9 In the case of the Proposed Development, the business model targets 200-250 individual visits per day. Of these, it can be expected that:
- The busiest time period is between 17:00 and 20:00 during the weekday with Tuesdays being the most popular day.
 - The busiest hour of the day accounts for approximately 10% of visitors on that specific day.
 - Visitors use the gym for between 30-60mins on average.
- 5.10 On the basis of the above, it is forecast that the maximum number of people arriving at the Gym during a single hour would be circa 25 people. The number of visitors leaving during this peak hour is likely to be fewer than 25 as departures will be dependent on the lower, pre-peak hour arrival rate.

Travel Demand Assessment

- 5.11 Based on the analysis above, both the extant use at the Site and the Proposed Development are predicted to attract similar volumes of peak hour traffic. It is therefore concluded that the change of use would result in a de minimis impact on the operation of the highway network.

Car Parking

- 5.12 The effect on car parking of the COU planning application subject to this assessment would be to remove demand associated with the existing non-food retail store but introduce demand associated with the gym.
- 5.13 It is noted that the Site forms part of a wider shopping centre and town centre area. For many visitors to the Proposed Development, and indeed the extant retail store, their journey will be linked to visits to other town centre destinations. In the absence of the Proposed Development therefore, many of these journeys would continue to be made. For example, employees of the adjacent civic buildings.
- 5.14 For the purposes of this assessment, a worst-case scenario is taken which is that the extant use and the Proposed Development are both stand-alone facilities.

- 5.15 Referring to the Parking SPG, the maximum car parking provision for the non-food retail store would be 105 spaces² and for the gym use, 130 spaces³.
- 5.16 Based solely on maximum car parking standards, the Proposed Development would require 25 car parking spaces more than the extant non-food retail store. However in comparison to the non-food retail store, the Proposed Development would operate on a 24-hour basis. The demand for car parking will therefore be more evenly spread throughout the day.
- 5.17 It is therefore concluded that the Proposed Development's peak car parking demand would be similar to the peak demand for the extant, non-food retail at the Site. Moreover the parking demand for the gym would occur over a longer time period resulting in less intense peak parking demand.

6.0 SUMMARY AND CONCLUSION

Summary

- 6.1 This Transport Statement has been prepared in support of a planning application which seeks to change the use of Unit B of Aberafan shopping centre ('the Site'), from a retail store (land use class A1) to a 24/7 Gym (land use class D2) ('the Proposed Development'). No changes to the gross floor area are proposed. No changes to the existing means of access to the building are proposed. Users of the Proposed Development will have the same access to car and cycle parking as users of existing use at the Site.
- 6.2 Many people who visit the Site will combine their trip to the gym with other purposes – like going to work, shopping, or other activities. If the Proposed Development was not built, these people would still make many of these trips anyway. For instance, people who work in nearby civic buildings are already travelling to the area. By adding the Proposed Development, the town centre will have more destinations in one place. This should reduce the number and length of trips people make, since they can do more in a single journey.
- 6.3 Nonetheless, the transport statement still considers the potential impacts of the Proposed Development on its own, without assuming those trip-combining benefits.
- 6.4 PPW recognises and emphasises the key role that the planning system has a to play in reducing the need to travel and supporting sustainable transport. This is reiterated in TAN18 which requires that requires that land use planning should help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport through influencing the location, scale, density and mix of land uses and new development. These national policies regarding land use planning and sustainable travel are reinforced in the NPT Local Development Plan.

² 1,958sqm and assuming non-operational floor space is 75%

³ Non-operational floor area of the gym is ca. 1,360sqm

- 6.5 The Proposed Development would have a 24/7 operation with staffed core hours and secure member access outside these times.
- 6.6 The Site is located within the centre of Port Talbot and integrated with existing pedestrian and cycle networks. Port Talbot bus and coach station is located within less than a 400m walk with the Port Talbot Parkway railway station within an 800m walk.
- 6.7 Whilst there is no dedicated car parking associated with the Site, there are over 1,200 public parking spaces nearby for use by visitors to the Aberafan Shopping Centre and wider Town Centre. Existing cycle parking is available in and around the Aberafan shopping centre.
- 6.8 The adopted Parking SPG indicates that, based on floor area alone, gym use has a slightly higher parking requirement than retail. However, parking demand for the Proposed Development is predicted to be more evenly spread, reducing peak intensity.
- 6.9 Peak hour trip generation for the gym is expected to be similar to the former retail store. Impact on the operation of the local highway network is therefore assessed as de minimis.

Conclusion

- 6.10 Based on the analysis set out above, it is concluded that the Site is a suitable location for the Proposed Development because:
- The operation of the Proposed Development has a de minimis impact on the safe, effective and efficient use of the highway network and will not have an adverse impact on highway safety or create unacceptable levels of traffic generation;
 - Appropriate levels of parking and cycling facilities are provided;
 - The access arrangements for the Site allow for the safe manoeuvring of service vehicles associated with the planned use;
 - The Site is accessible by a range of travel means, including public transport and safe cycle and pedestrian routes; and
 - The Proposed Development contributes towards reducing the number and length of journeys made
- 6.11 There are therefore no transport or highway reasons for withholding or refusing planning permission for the proposed change of use at the Site.