

Our ref: 250906_1399_Supporting_Letter_Planning

06th September 2025

Planning Department
Neath Port Talbot County Borough Council
The Quays
Brunel Way
Baglan Energy Park
Neath
SA11 2GG

Ref: Supporting Statement – Proposed Change of Use from C3 Dwelling to 5-Bedroom HMO at First Floor, 9 High Street, Cwmafan, Port Talbot, SA12 9BH
Applicant: DGP Properties Limited

Dear Sir/Madam,

We write in support of the above planning application on behalf of our client, DGP Properties Limited, for the proposed change of use of the first floor at 9 High Street, Cwmafan, from a single 4-bedroom dwelling (Use Class C3) to a 5-bedroom House in Multiple Occupation (Use Class C4).

The proposal seeks to deliver much-needed supported accommodation in partnership with *The Wallich*, a registered Welsh charity dedicated to supporting individuals who are homeless or at risk of homelessness. The accommodation will provide residents with a safe and secure environment comprising private bedrooms, a shared kitchen/dining area, and individual shower/WC facilities—supporting independence, stability, and reintegration into the community.

We note:

“We operate a similar model of temporary accommodation with The Wallich at Ty Raena, Talbot Road. The Wallich are interested in operating services here that align with the Rapid Rehousing Plan, should they receive confirmed support funding to operate it.”

Policy Justification

National Planning Policy – Future Wales and Planning Policy Wales (PPW11)

The proposal aligns with Planning Policy Wales (Edition 11), which promotes a mix of housing types to reflect the needs of all members of society, including vulnerable and disadvantaged groups (PPW11, para. 4.2.2). It supports the principles of placemaking (PPW11, Section 2), providing inclusive housing options in a sustainable location.

The development also meets the ambitions of *Future Wales: The National Plan 2040*, particularly Policy 2, which encourages compact, accessible development within existing settlements and supports cohesive, inclusive communities.

Neath Port Talbot Local Development Plan (2011–2026)

- The site falls within the defined settlement boundary of Cwmafan. Policies H1 and H3 support infill and windfall developments that make effective use of existing buildings.
- The proposal directly contributes to the sustainable housing objectives of Policies SP7 and SP10, which promote efficient reuse of the built environment.

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- The scheme supports the Council's Local Housing Strategy and statutory duties under the Housing (Wales) Act 2014 to prevent and relieve homelessness.
- The proposal also reflects the Welsh Government's *Rapid Rehousing Transition Plan (2022)*, which requires local authorities to increase supply of high-quality, short-term accommodation to meet urgent housing needs.

Design, Access, and Safeguarding

The proposal involves internal reconfiguration to create five self-contained bedrooms with shared kitchen and dining facilities. The building will be accessed independently via the existing rear pedestrian entrance, maintaining separation from the ground floor commercial unit (a barbershop, which will remain in use).

The scheme includes the following safeguarding and amenity measures:

- Each room will provide adequate outlook, natural light, and ventilation, in line with HMO Licensing Standards.
- External enhancements include re-rendering and installation of new windows, improving the building's contribution to the High Street.
- The property will be subject to HMO Licensing by Neath Port Talbot Council, ensuring compliance with fire safety, space standards, and management requirements.
- A professional housing support provider (*The Wallich*) will oversee day-to-day management, with staff presence and ongoing resident support to maintain a safe and well-managed environment.

Amenity, Drying Facilities, and Parking

Drying and Internal Amenity Provision

Concerns have been raised regarding the lack of external drying space. The applicant proposes to provide suitable drying facilities within the development itself. Each resident will have access to mechanical drying (tumble dryers) and secure internal drying areas, supported by the inclusion of solar panels to offset energy demand and provide a more sustainable solution. This ensures that residents have reliable, year-round drying facilities without the need for external gardens.

External Amenity Space

The property does not benefit from land within the applicant's ownership to provide private outdoor amenity. However, this is not unusual for upper-floor residential accommodation in high-street or community-centre locations, where the maintenance of private gardens is neither practical nor expected. In practice, the absence of external amenity space reduces the need for external storage (e.g. garden tools, mowers), which would be impractical in this setting.

Importantly, the site is located within a highly sustainable and well-connected community environment, with access to public open space, recreation grounds, and parks in close proximity. Residents will therefore have convenient access to outdoor space within the immediate area, ensuring that wider community amenities contribute to quality of life.

Car Parking

It is acknowledged that no dedicated on-site parking is provided. However, the building benefits from an extant residential use at first-floor level, which historically could have accommodated up to four bedrooms (and therefore multiple private vehicles). The proposed scheme creates five bedrooms, but the intended resident profile means that private car ownership is highly unlikely.

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The nature of supported accommodation means that residents will rely predominantly on walking, public transport, and local services rather than private vehicles. Even in the unlikely event that some residents do have access to a car, this would not result in a materially different impact on the local highway network compared with the existing residential use.

This position is consistent with the Council's Parking Standards SPG, which allows flexibility for specialist housing and supported accommodation, particularly in sustainable, accessible locations such as this.

Conclusion

This proposal makes efficient use of existing housing stock to deliver high-quality, supported accommodation for vulnerable individuals. It is consistent with national and local planning policy, responds directly to an identified local housing need, and will be operated in partnership with an experienced charitable provider.

The scheme is well-located, sensitively designed, and professionally managed, ensuring both community benefit and policy compliance. We trust this submission provides the necessary justification for the change of use and would welcome the opportunity to respond to any queries or provide further information as required.

Dominic Sauro

Yours faithfully,

Dominic Sauro

Sauro Architectural Design Limited

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