PLANNING STATEMENT

Retention of Ground Floor Offices
and Conversion of Upper Floors to Emergency Refuse Accommodation
with Three-Storey Rear Extension
at 41 New Road, Skewen, Neath, SA10 6EP

On behalf of
DGP Properties Limited

Our Ref: 1292.b
Date: November 2025
Prepared by: Shannon Stone **Approved by:** Richard Banks

1.0 INTRODUCTION 3

2.0 SITE DESCRIPTION 4
- **2.1 THE SITE** 4
- **2.2 THE SURROUNDING AREA** 9
- **2.3 PARKING SUSTAINABILITY APPRAISAL** 13
- 2.4 **PROJECT DESIGN PARAMETERS AND PRINCIPLES** 17

3.0 THE PROPOSED DEVELOPMENT 18
- **3.1 GENERAL SCALE** 18
- **3.2 EXTERNAL FINISHES AND MATERIALS** 19
- **3.3 INTERNAL DESIGN AND LAYOUT** 21
- **3.4 ACCESS AND PARKING** 23
- **3.5 DRAINAGE** 25
- **3.6 BIODIVERSITY** 25

4.0 LOCAL PLANNING POLICY 26
- **4.2 POLICY SP3 – SUSTAINABLE COMMUNITIES** 26
- **4.3 POLICY R2 – PROPOSALS WITHIN RETAIL CENTRES** 27
- **4.4 POLICY BE1 – DESIGN** 30
- **4.5 POLICY TR2 – DESIGN AND ACCESS OF NEW DEVELOPMENT** 31
- **4.6 NPT PARKING STANDARDS (OCTOBER 2016)** 32

5.0 CONCLUSION 40

1.0 INTRODUCTION

1.1 Evans Banks Planning has been instructed by DGP Properties Limited to prepare and submit an application seeking full planning permission for the *"Retention of Ground Floor Offices and Conversion of Upper Floors to Emergency Refuse Accommodation, with Three-Storey Rear Extension"* at 41 New Road, Skewen, Neath, SA10 6EP.

1.2 This Planning Statement therefore forms part of the submissions of the application to be considered by the Authority and provides information on the following points:

- A brief description of the site and surrounding area
- A description of the proposed development
- Consideration of relevant planning policy

1.3 Pre-application advice was sought from Neath Port Talbot County Borough Council regarding a proposed "*HMO and flat development"* at 41 New Road, Skewen **(reference Q2025/0215).** The pre-application advice highlighted the need to retain ground floor commercial uses, protect residential amenity, ensure sufficient parking, and address waste, biodiversity, and sustainable drainage. Concerns were raised regarding over-concentration of HMOs, overlooking, visual impact, and highway safety from increased traffic along the rear lane.

1.4 However, the proposals subject of this application seek to clarify the precise use of the building which <u>will operate significantly different from residential apartments and / or a House of Multiple Occupation (HMO).</u> The scheme seeks retaining the ground floor offices, and thus maintaining an active commercial use. The conversion of the first and second floors will specifically be for use by persons in urgent need of emergency refuse accommodation. Each created bedroom will be provided with its own kitchenette and en-suite bathroom, but administered from the ground floor offices administered by a Registered Charity, who already have successfully provided an identical facility at a base at Talbot Road in Port Talbot. That development was granted Planning Permission in September 2021 under Application **P2021/0584.**

1.5 The proposed design under this application at Skewen has been carefully arranged to avoid overlooking of neighbouring properties at New Road. This Planning Statement includes a **Parking Sustainability Appraisal**, which demonstrates that the site can operate effectively with fewer spaces than typically required. Overall, the development aligns with LPA guidance and represents an acceptable, policy-compliant use for the site.

2.0 SITE DESCRIPTION

2.1 THE SITE

2.1.1 The application site relates to a three-storey, end-of-terrace property situated off the northern flank of New Road, Skewen – a street characterised by a mix of commercial and residential uses. The site location plan is shown in Figure 1 below.

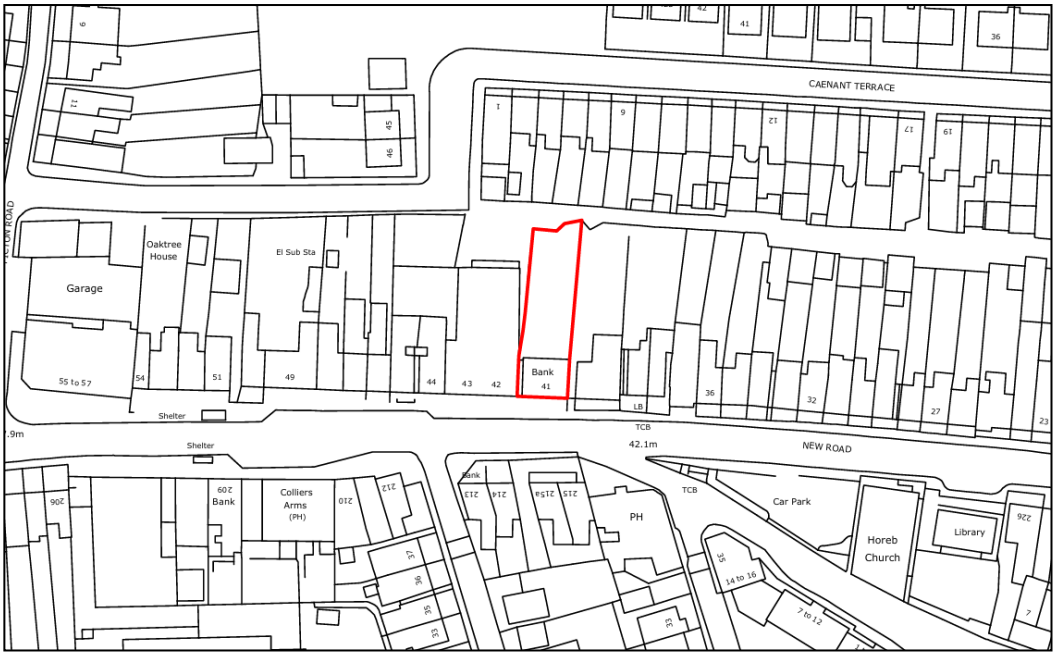

Figure 1

2.1.2 Photographs 1 and 2 below show the building's principal (front) elevation.

Photograph 1

Photograph 2

2.1.3 As illustrated, the building features dressed stone at ground-floor level and light blue render to the first and second floors. The frontage includes several white, timber-framed windows, and is characterised by two steeply pitched gables overlooking the street.

2.2.1 Photographs 3 and 4 provide views from the front elevation along New Road, illustrating that the surrounding area comprises a mix of residential and commercial properties.

Photograph 3

Photograph 4

2.1.4 Photograph 5 below shows the property's rear elevation, with surfaced car park leading out to a rear lane access.

Photograph 5

2.1.5 The rear elevation is also finished in light blue render and contains several windows of varying sizes. As shown, there are two rear access points at lower-ground-floor level, along with an additional access at ground-floor level, which is reached via a black metal staircase.

2.1.6 Photograph 6 below provides a closer view of the roof as seen from the rear boundary. The variation in roof levels indicates that the property has previously undergone a rear extension.

Photograph 6

2.1.7 Photographs 7 and 8 below show the rear parking area, which is fully surfaced in tarmac and provides ten off-street parking spaces that formerly served the bank that was in situ for many years.

Photograph 7

Photograph 8

2.1.8 Photograph 9 below displays a view of the buildings directly east of the application site. Notably, **both buildings shown feature rear extensions that extend much further than the rear of the application site**.

Photograph 9

2.1.9 In contrast, the view directly to the west of the application site is dominated by a solid brick wall belonging to the adjoining commercial property, which projects a considerable distance beyond the rear of the application site, as shown in Photograph 10 below.

Photograph 10

2.1.9 Photograph 11 below displays a view of the application site's metal access gate, which is surrounded by a stone wall.

Photograph 11

2.2 THE SURROUNDING AREA

2.2.1 Photographs 12 and 13 below show views from the rear access point of the application site, which opens onto a back lane that runs between and parallel to the properties along New Road and Caenant Terrace.

Photograph 12 – View Westward

Photograph 13 – View Eastward

2.2.2 Notably, the rear access to the application site is located only approximately 17 metres from the entrance to the lane off Caenant Terrace, as illustrated in the Google Maps extract in Figure 2 below.

Figure 2

2.2.3 Significantly, the short distance between the entrance of the lane and the application site demonstrates any traffic from the site would reach the adopted highway almost immediately, significantly reducing potential risk to highway safety.

2.2.4 Figure 3 below presents an extract from the *FindMyStreet* map, showing that the rear lane is depicted as an unclassified road.

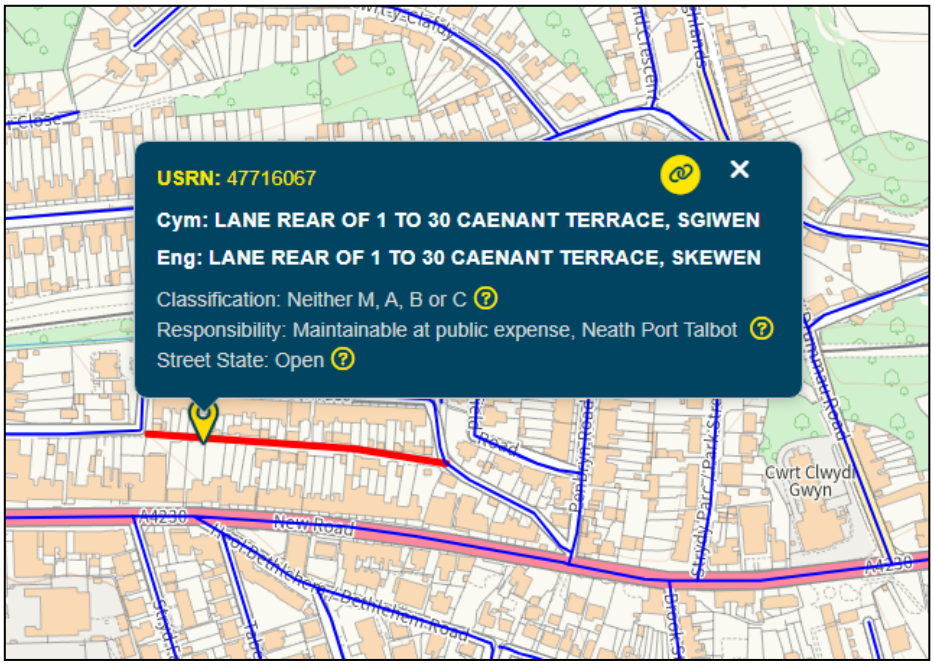

Figure 3

2.2.5 Figure 24 below presents a Google Earth satellite image (captured in August 2022), highlighting the application site and illustrating its proximity to other residential and commercial properties.

Figure 4

2.2.6 The application site is situated on New Road within the town of Skewen, directly adjoining a range of nearby commercial and residential properties. Skewen itself features a diverse mix of uses, and this varied character is particularly evident along New Road. Skewen features a diverse range of services and amenities, including a library, nursery, general practitioner, surgery, pharmacy, football club, cricket club, community centres, primary schools, convenience stores, churches, cafés, restaurants, bars, amongst others.

2.2.7 Skewen is also well served by public transport, with the application site being only 350 metres from **Skewen Railway Station**, which offers frequent services to Cardiff Central, Pembroke Dock and Swansea. In addition, the application site is only 70 metres from the nearest bus stop, which offers frequent services between Swansea Bus Station and Neath Bus Station.

2.2.8 The local vernacular is diverse, featuring a range of roof styles, a mix of brick and rendered finishes, and buildings of two to three storeys. Figures 5-9 below illustrate

examples of nearby flats, HMOs, and care homes, highlighting the variety of residential accommodation within the area.

Figure 5

Figure 6

Figure 7

Figure 8

Figure 9

2.3 PARKING SUSTAINABILITY APPRAISAL

2.3.1 The site encourages active travel due to its proximity to multiple existing and future walking and cycling routes. This is supported by Figure 10 below, which shows the Active Travel Network Maps provided by *Data Map Wales* for the local area.

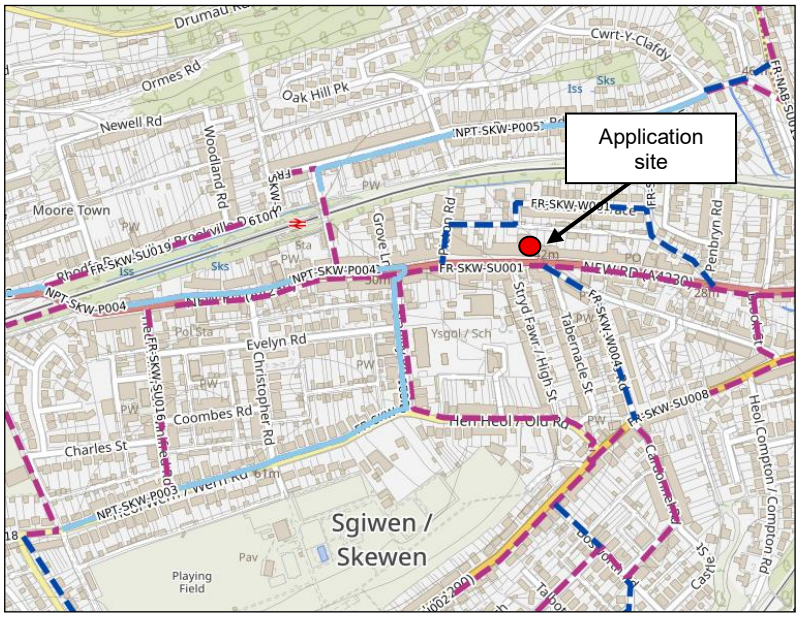

Figure 10

2.3.2 Figure 10 above illustrates the Council's proposed enhancements to the active travel network in the vicinity of the application site. The map uses colour-coded lines to differentiate route types: solid blue lines represent existing cycling routes; solid yellow lines denote existing walking routes; and solid pink lines indicate existing shared walking and cycling routes. Proposed future routes are shown as dashed lines – pink for future shared walking and cycling routes, and blue for future walking-only routes. These planned improvements are intended to enhance both accessibility and the overall sustainability of travel options for the application site and surrounding area. Notably, the application site is situated close to the National Cycle Network Route 47, as illustrated by Figure 11 below.

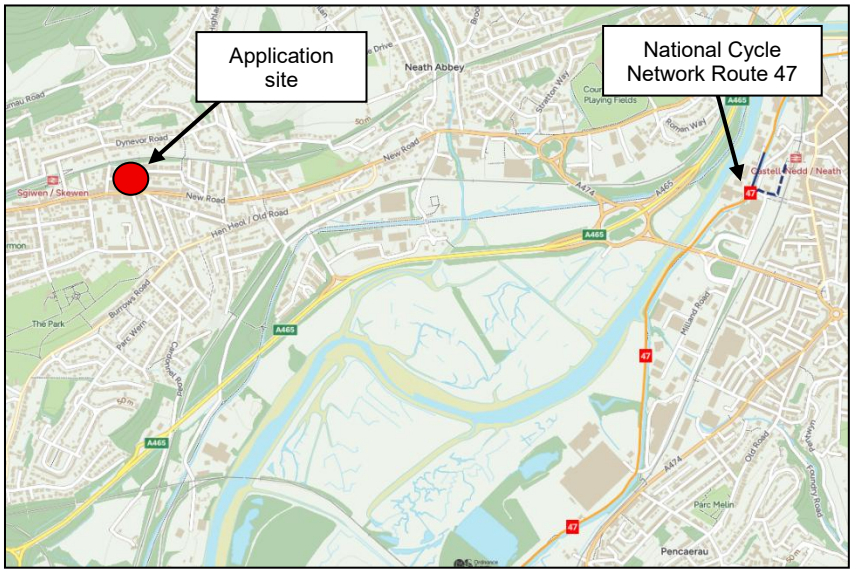

Figure 11

2.3.3 The accessibility of the area is further supported by the Catchment Maps shown in Figures 12 and 13 below.

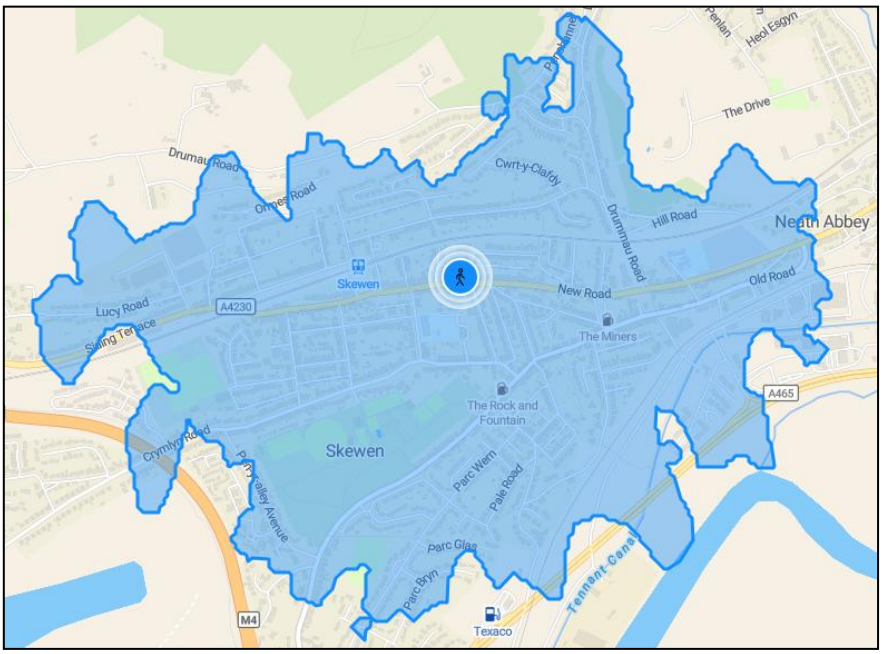

Figure 12 – 15-minute Walking Catchment Map

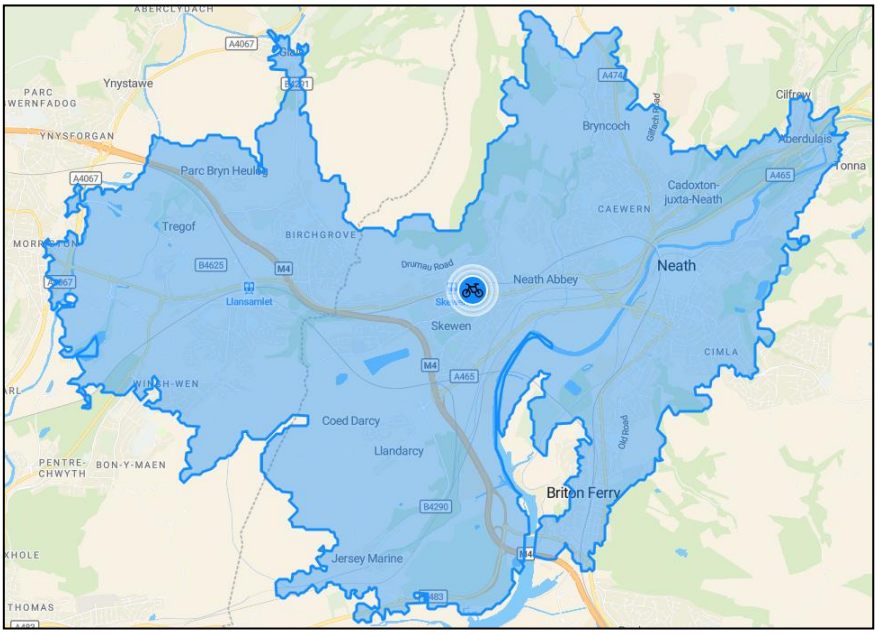

Figure 13 – 20-minute Cycling Catchment Map

2.3.4 Figure 14 below presents the walking distances from the application site to local amenities and services.

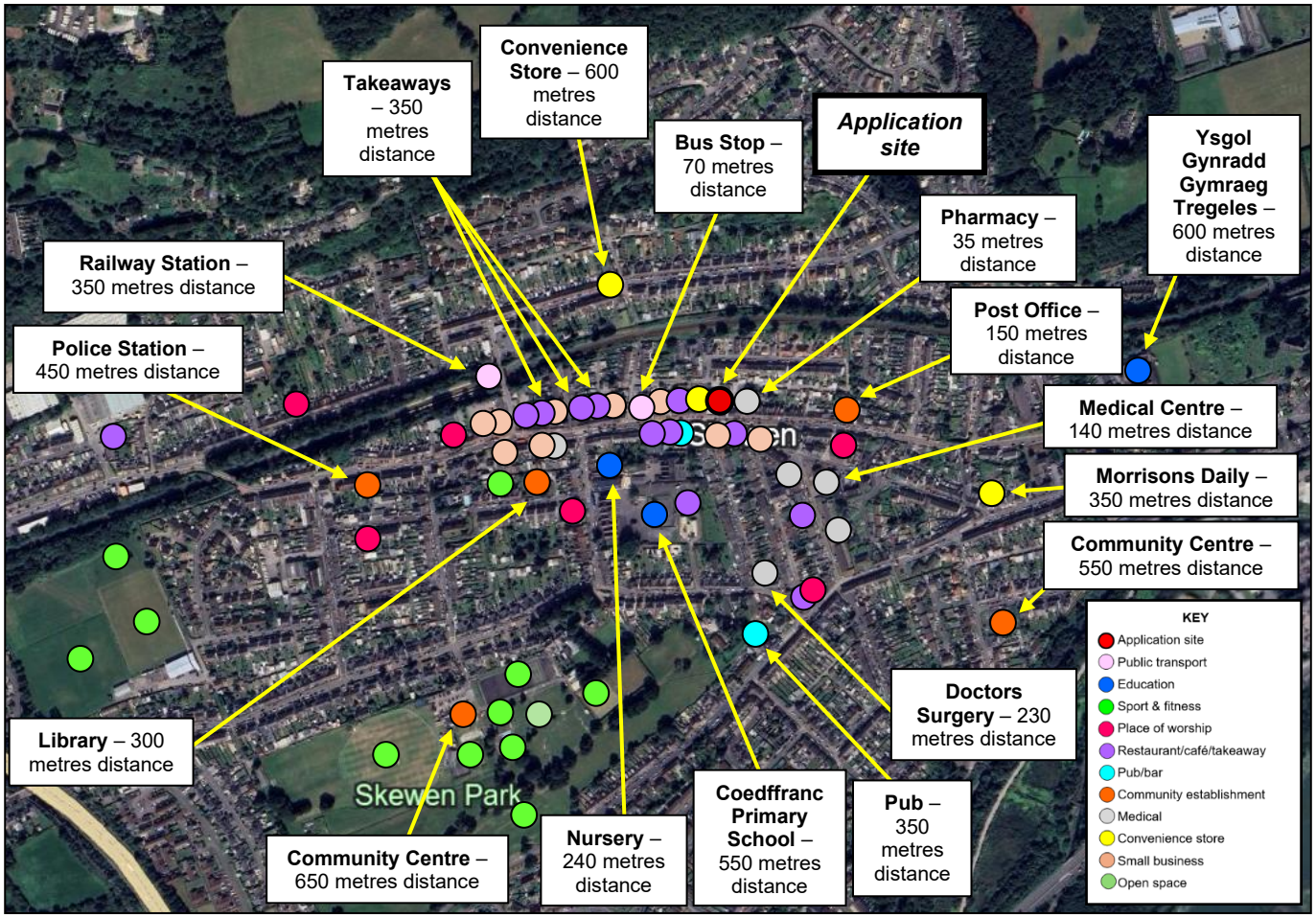
Takeaways – 350 metres distance
Convenience Store – 600 metres distance
Bus Stop – 70 metres distance
Application site
Ysgol Gynradd Gymraeg Tregeles – 600 metres distance
Pharmacy – 35 metres distance
Railway Station – 350 metres distance
Post Office – 150 metres distance
Police Station – 450 metres distance
Medical Centre – 140 metres distance
Morrisons Daily – 350 metres distance
Community Centre – 550 metres distance
Doctors Surgery – 230 metres distance
Library – 300 metres distance
Skewen Park
Community Centre – 650 metres distance
Nursery – 240 metres distance
Coedffranc Primary School – 550 metres distance
Pub – 350 metres distance
KEY
Application site
Public transport
Education
Sport & fitness
Place of worship
Restaurant/café/takeaway
Pub/bar
Community establishment
Medical
Convenience store
Small business
Open space

Figure 14

2.4 PROJECT DESIGN PARAMETERS AND PRINCIPLES

2.4.1 As a result of the local context and the aspirations of the Applicant for the property, the following design principles and parameters influenced the design of the proposal subject of this planning application:

- ***Scale*** – The development is designed to integrate with the existing streetscape, ensuring it does not dominate the surrounding area.
- ***Design*** – The proposal is designed to be sympathetic to the local character, using materials that match those already present on the existing building.
- ***Access*** – Safe vehicular and pedestrian access will be maintained.
- ***Drainage –*** Surface water will be managed via existing sustainable drainage solutions in line with national and local guidance, and foul drainage will continue to use its existing system.
- ***Biodiversity –*** The scheme incorporates measures to protect and enhance local biodiversity, including the installation of bat boxes to support local wildlife.

3.0 PROPOSED DEVELOPMENT

3.0.1 The proposal seeks to provide Emergency Refuge Accommodation within the first and second floor of 41 New Road. The recent pre-application advice issued by Neath Port Talbot County Borough Council related to a different scheme – namely a proposed HMO and flat development at the site (reference **Q2025/0215**). Although the current application is fundamentally different in both use and operational nature, the advice received has nevertheless informed the revised approach, ensuring that the present proposal appropriately responds to the key matters previously raised by the Authority. These include the retention of ground floor commercial use, the protection of residential amenity, the management of any potential overlooking, and consideration of access and parking matters.

3.0.2 The proposed accommodation will provide secure bedrooms for vulnerable individuals seeking emergency temporary refuge. The accommodation will be managed by the same registered charity that intends to occupy the ground floor offices, enabling consistent on-site oversight. The charity will provide counselling, welfare support, and wider assistance to residents as part of its established service provision.

3.1 GENERAL SCALE

3.1.1 The proposed development includes the construction of a three-storey rear extension to the property. The extension has been sensitively designed to provide additional space for Emergency Refuge Accommodation while remaining clearly subordinate to the existing building. Its scale, proportions, and materials have been carefully selected to integrate seamlessly with the scale and design of the original property and to reflect the character of neighbouring buildings, several of which feature comparable rear extensions (as previously shown in Photograph 9).

3.1.2 Figure 15 below illustrates the site layout plan, demonstrating the scale of the proposed rear extension, its sympathetic integration with the existing building, and the accompanying car park layout, which will provide six on-site parking spaces. **The extension extends to a depth consistent with neighbouring rear extensions,**

creating a cohesive relationship with the adjoining built form and maintaining a uniform rear building line.

Figure 15 – Site Layout Plan

3.2 EXTERNAL FINISHES AND MATERIALS

3.2.1 The proposal seeks to construct a **three-storey rear extension** to the existing buidling, as illustrated in Figures 16 and 17, which show the existing and proposed elevation plans respectively.

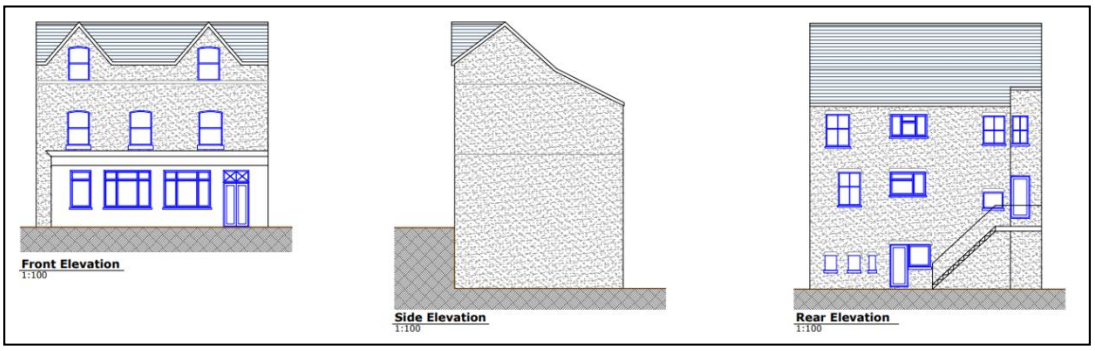

Figure 16 – Existing Elevation Plans

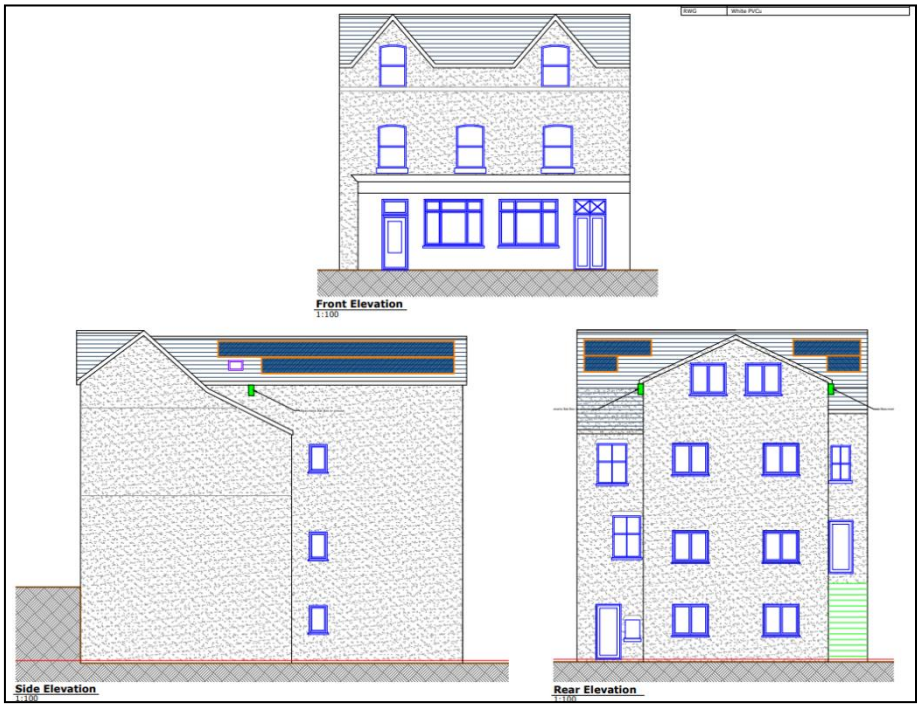

Figure 17 – Proposed Elevation Plans

3.2.2 As shown, the front elevation will be mostly retained, with the only change being the replacement of the left-side ground floor window as a door, which will serve as a reception for the Emergency Refuse Accomodation, while the existing entrance door will serve the offices of the registered charity.

3.2.3 The proposed rear extension has been finished in a matching light blue render, ensuring continuity with the existing building. This design approach preserves the character of the property and allows the extension to integrate seamlessly with the host dwelling.

3.2.4 New window and door openings have been carefully incorporated into the rear and side elevations to provide appropriate levels of natural daylight and ventilation across all three floors. The arrangement of the rear-facing windows has been designed so that **each room benefits from an outlook without overlooking neighbouring properties**.

3.2.5 All existing and proposed windows serving the accomodation rooms will be upgraded to double-glazed uPVC units, matching the style of the existing fenestration while improving energy efficiency within the accomodation.

3.2.6 The extension incorporates a pitched, tiled roof with a central gable, while the remainder of the roof is set lower than the existing roof of the main dwelling. This design allows the new structure to remain visually subordinate to the original building. The roof tiles match the existing property, and solar panels are integrated to enhance energy efficiency.

3.2.7 Overall, the development delivers a sensitively designed rear extension that respects the scale and appearance of the existing property. The chosen materials integrate the new accommodation with the original property while providing a more contemporary architectural design that enhances the site's overall character.

3.3 INTERNAL DESIGN AND LAYOUT

3.3.1 Figures 18 and 19 below display the existing and proposed ground floor plans, respectively.

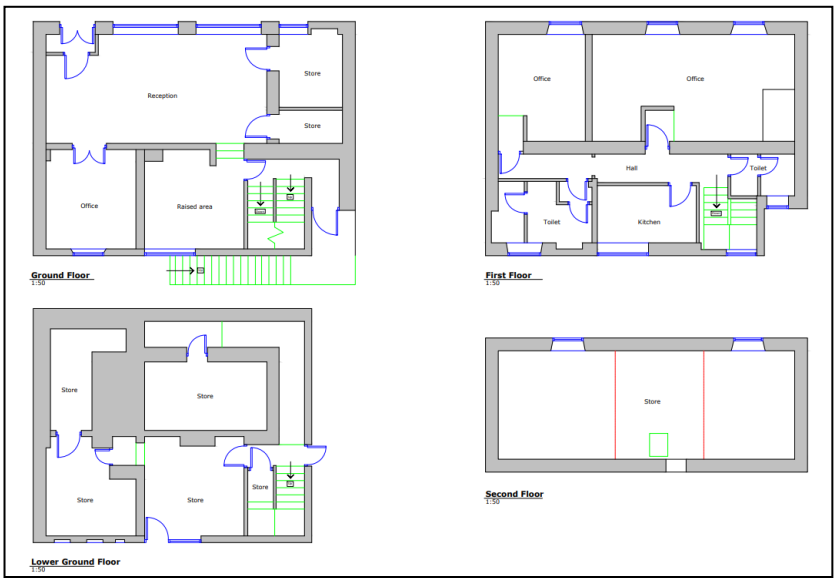

Figure 18

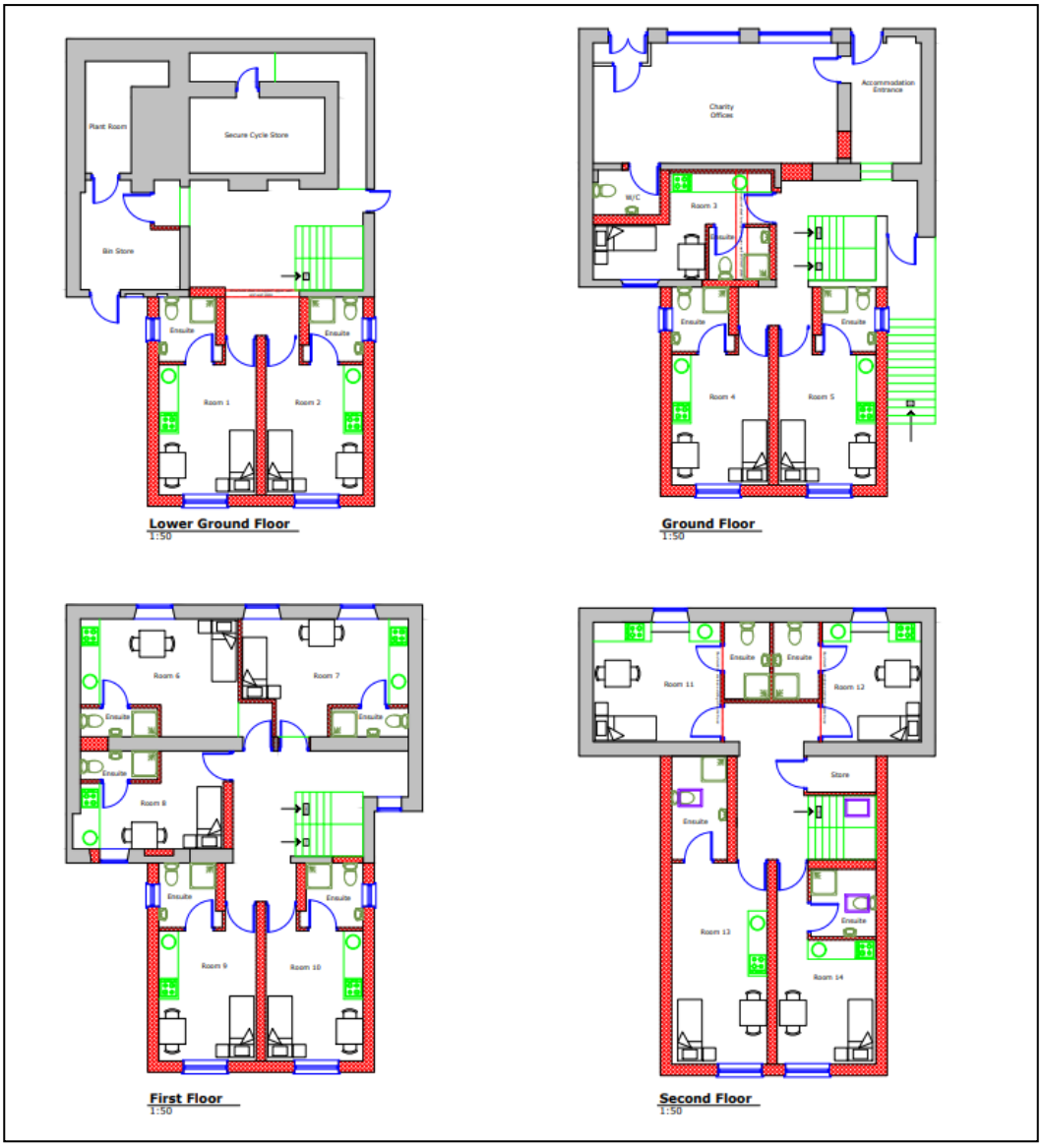

Figure 19

3.3.2 As shown, the existing reception area on the ground floor will be retained and used by the registered charity as office space. Staff will enter the building through a separate entrance, ensuring that staff and residents remain separate, thereby maintaining privacy and security. The residents' access leads directly to a stairwell providing access to both the upper and lower floors. The ground floor will include three

accommodation rooms: one within the existing building and two within the rear extension.

3.3.4 At the lower ground floor level, the original property's footprint will accommodate the bin store, plant room, and secure cycle storage, while the rear extension will provide two additional accommodation rooms.

3.3.5 The first-floor level will feature five accommodation rooms, and the second-floor level will provide four rooms, resulting in a **total of fourteen rooms** across the property.

3.3.6 Each room contains everything that is required for an overnight or temporary short stay. Each room contains a bed, small kitchenette and seating area. There is also an ensuite which contains a shower, toilet and sink within each room. The emphasis is upon limited stays of only a couple of nights, with the limited individual floorspace impractical to offer anything more than that timescale. The intent is to offer a temporary solution to an individual's homelessness, and to guide and steer that individual to more permanent accommodation elsewhere in association with local authority and housing association support networks.

3.4 ACCESS AND PARKING

3.4.1 Neath Port Talbot County Borough Council's Supplementary Planning Guidance: Parking Standards (October 2016) establish the parking requirements for different land uses across the County Borough. The application site falls within **Zone 2 – Town Centre / City Centre Fringe**, an area characterised by strong transport accessibility, a wide range of nearby facilities, and limited reliance on private car ownership.

3.4.2 This is supported by the LDP map, which places the application site within a District Centre, defined as *"Settlements with good transport links and a wide range of functions serving the immediate and surrounding communities",* as shown in Figure 20 below.

Figure 20 – LDP Map

3.4.3 Emergency Refuge Accommodation (Use Class C3b) is **not assigned a specific parking requirement** within the NPT Parking Standards. The closest comparator being a HMO does not accurately reflect the operational nature of the proposed use, which accommodates short-term residents who typically do not own or use private vehicles. As such, the **flexible approach** is applicable to this proposal, which is supported by Note 5 of Section 4 of the NPT Parking Standards, which states:
"For developments where clear evidence has been supplied that car ownership levels will be lower than normal, a more flexible approach to numbers of parking spaces may be taken."

3.4.4 The development provides **six on-site parking spaces**, two of which are allocated for staff associated with the ground-floor office use. The remaining four spaces serve the Emergency Refuge Accommodation. Secure cycle storage is also provided at lower ground floor level.

3.4.5 Given the **short-stay nature of the accommodation**, the **absence of visitor trips**, the **likelihood of very low car ownership among residents**, and the excellent public transport and active travel connections, this level of provision is considered appropriate.

3.4.6 A **Parking Sustainability Appraisal** – including detailed scoring of local facilities, public transport frequency, and the resulting reduction in parking requirements – is provided in **Section 4.6** of this Statement. This demonstrates that the site achieves **sufficient sustainability points to justify a substantial reduction in parking provision**, in accordance with NPT Parking Standards.

3.4.7 Accordingly, the proposed parking, access and active travel arrangements are considered acceptable, policy-compliant and proportionate to the needs of the development.

3.5 DRAINAGE

3.5.1 Notably, the area proposed for the rear extension is currently covered by a tarmac surface, so the development will not result in any increase in impermeable area. Surface water will continue to discharge to the existing combined drainage system, ensuring that there is no significant change to surface water runoff from the site. Foul water will continue to connect to the existing mains sewer.

3.6 BIODIVERSITY

3.6.1 To support and enhance local biodiversity, the proposal includes the installation of two *Beaumaris Bat Boxes* (or similar) on the rear elevation of the building, and one Beaumaris Bat Box (or similar) will be installed on the side elevation of the proposed extension. These measures will provide a suitable habitat for local wildlife, contributing to the conservation of species commonly found in the area. The installations will be carefully positioned to minimise disruption to the building's structure while maximising ecological benefits.

3.6.2 Further details regarding biodiversity mitigation and enhancement measures can be found in the accompanying Green Infrastructure Statement.

4.0 LOCAL PLANNING POLICY

4.0.1 In terms of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the adopted development plan for the area within which the application site is positioned is the *Neath Port Talbot Local Development Plan* (LDP). It is therefore the policies of this document that have been referred to in the preparation of the proposal subject of the planning application in question, including the following:

- ***SC1*** – Settlement Limits
- ***SP3*** – Sustainable Communities
- ***R2*** – Proposals Within Retail Centres
- ***TR2*** – Design and Access of New Development
- ***BE1*** – Design

4.0.2 All of the above have been considered in preparation of the pre-application proposal. The following therefore provides an assessment of the proposal against what are considered to be the key policies and guidance for consideration in its determination.

4.1.1 Accordingly, particular attention has been paid to Policies SP3, R2, TR2 and BE1, which are considered of key relevance to this application. The following sections provide a detailed assessment of the proposal against the specific requirements of these policies.

4.2 POLICY SP3 – SUSTAINABLE COMMUNITIES

4.1 Policy SP3 seeks to deliver sustainable, healthy, and cohesive communities while conserving the countryside. This is achieved by defining a settlement hierarchy, establishing settlement limits within which development will be supported in principle, and resisting inappropriate development outside those limits.

4.2 The application site is located within the defined settlement limits of Skewen, which is identified in the LDP as a large, sustainable settlement containing a broad range of community facilities, shops, services, and frequent public transport connections.

Development within such sustainable urban locations is supported in principle, and the proposed reuse of the existing building therefore accords with the spatial strategy set out in Policy SP3.

4.3 The proposal contributes positively to the delivery of sustainable communities in line with Policy SP3 by making efficient use of a brownfield site in a highly accessible district centre location, thereby reducing the need for development on greenfield land.

4.4 The proposal makes efficient use of previously developed land and buildings within the settlement boundary. It is therefore consistent with Policy SP3's objective of resisting inappropriate development outside settlement limits.

4.5 In summary, the proposal is wholly consistent with Policy SP3 as it is located within the settlement limits of Port Talbot, makes sustainable use of previously developed land, supports the creation of a cohesive and accessible community, and avoids development in the countryside.

4.3 POLICY R2 – PROPOSALS WITHIN RETAIL CENTRES

4.3.1 Policy R2 supports proposals within designated retail centres that enhance the vitality, viability, and attractiveness of the area. The policy encourages development that strengthens the retail character, makes effective use of upper floors, and maintains a vibrant and active street frontage. It also sets out specific criteria for assessing the conversion or redevelopment of premises, ensuring that such changes provide community, regeneration, and/or townscape benefits.

4.3.2 The application site is located on New Road, within the defined Skewen District Centre. The proposal involves repurposing the vacant upper floors for Emergency Refuge Accommodation, while the ground floor will be retained in commercial use as offices. Although the proposal does not fall within a Class A or D use and therefore does not strictly comply with Criterion 1 of Policy R2, **the existing A2 use (bank) has ceased, leaving the building underutilised**. Nevertheless, it is noted that the last occupants of the ground floor were as an office use, being for a Nursing Contracting Company.

4.3.3 The proposal therefore represents a positive re-use of an inactive commercial premises while retaining an active and attractive street frontage that continues to contribute to the vitality of the centre.

4.3.4 **Criterion 1** of Policy R2 states:

"*Within the designated retail centres, uses that would enhance the vitality, viability and attractiveness of the centre, including uses in classes A and D will be permitted where:*

a) The proposal integrates with and strengthens the layout, retail character and pedestrian flows of the centre; and

b) Does not prejudice the effective use of upper floors; and

c) Maintains a vibrant and attractive shopping street frontage."

4.3.5 While the proposed B1 office use does not fall within Class A or D, the development still aligns with the aims of Criterion 1(a) by retaining an active commercial frontage on New Road. The continuation of office use ensures a meaningful daytime presence, reinforcing the established commercial character of Skewen and contributing positively to pedestrian activity within the district centre.

4.3.6 In relation to Criterion 1(b), the proposal makes effective use of the underutilised upper floors, introducing Emergency Refuge Accommodation. This represents a socially valuable and efficient reuse of previously underutilised space in a highly accessible urban location, in full accordance with the objectives of Policy R2.

4.3.7 With respect to Criterion 1(c), the proposal preserves the existing façade and architectural detailing of the building, maintaining visual continuity along New Road. No significant alterations to the front elevation are proposed, ensuring that the active street frontage and established character of the retail centre are protected.

4.3.8 Because the ground floor use no longer falls within Class A or Class D as referenced in Criterion 1, the proposal must instead be assessed against Criterion 2. This criterion permits alternative uses where specific tests relating to viability, community function, and regeneration value are met.

4.3.9 In relation to Criterion 2(a), the previous bank use is no longer viable in this location. The building has been vacant for a prolonged period following the bank's closure, demonstrating that reoccupation by a similar Class A2 use is unlikely. The proposed office use provides a suitable and sustainable replacement, ensuring the continued occupation of the property.

4.3.10 Regarding Criterion 2(b), the proposal does not result in the loss of any important local service such as a shop, supermarket, café, or public house. No essential community facility will be displaced, and the development instead supports the district centre by reintroducing an active commercial use.

4.3.11 The proposal also meets Criterion 2(c), which supports redevelopment of underused premises where significant community or regeneration benefits arise. The reuse of the vacant upper floors for Emergency Refuge Accommodation provides essential support for vulnerable individuals and makes productive use of underutilised space, delivering clear social and community benefits.

4.3.12 The proposal also accords with Criterion 3 of the policy, which seeks to maintain a vibrant and attractive shopping street frontage. The development retains the existing building façade and ensures continued commercial activity at ground floor level, thereby maintaining the visual continuity and active frontage along New Road.

4.3.13 In summary, although the proposal does not fall within the preferred Class A or D uses listed under Criterion 1, it fully satisfies the requirements of Criterion 2 and Criterion 3. The development reoccupies a vacant town centre property, retains an active commercial frontage, provides significant social value through the introduction of Emergency Refuge Accommodation, and contributes positively to the vitality and ongoing functioning of Skewen district centre.

4.4 POLICY BE1 – DESIGN

4.4.1 Policy BE1 requires all development proposals to demonstrate high quality design that considers the natural, historic, and built environment, contributing to attractive, sustainable places. Proposals will only be permitted where all relevant criteria are satisfied.

4.4.2 In line with Criterion (1), the proposed development complements and enhances the character and appearance of the site and existing building in terms of siting, appearance, scale, height, massing, and elevation treatment. The existing front elevation on New Road is retained, and the internal conversion of upper floors into Emergency Refuge Accommodation has been carefully designed to respect the original form while providing functional accommodation units.

4.4.3 With respect to Criterion (2), the scheme respects the context of the site within Skewen town centre, maintaining compatibility with the local townscape and historic character. The development does not affect prominent skylines, gateways, or local heritage assets. The design responds appropriately to the scale, height, and form of surrounding properties and the topography of the site, ensuring a cohesive integration into the existing urban environment.

4.4.4 In accordance with Criterion (3), materials have been selected to complement the existing façade and surrounding streetscape, ensuring the development integrates seamlessly with its immediate environment.

4.4.5 In regard to Criterion (4), the development will not have a significant adverse impact on highway safety or the amenity of nearby properties. The site is accessible by active travel and public transport, and existing on-street parking arrangements remain unaffected.

4.4.6 Consistent with Criterion (5), the proposal incorporates ecological enhancements through the installation of bat boxes to support biodiversity.

4.4.7 In line with Criterion (6), the layout promotes natural surveillance and safe, well-lit spaces throughout. Access to the property is designed in accordance with 'Secured by Design' principles to ensure safety, visibility, and accessibility.

4.4.8 With respect to Criterion (7), the site benefits from excellent pedestrian, cycling, and public transport connections, linking the development with the wider community and town centre facilities.

4.4.9 Consistent with Criterion (8), the proposal makes efficient use of brownfield land within the district centre, maximising density without overdevelopment, and avoiding impact on adjacent sites.

4.4.10 Finally, in regard to Criterion (9), drainage arrangements utilise existing infrastructure and incorporate measures to manage surface water runoff, ensuring no increased flood risk.

4.4.11 In summary, the proposed conversion of upper floors into Emergency Refuge Accommodation fully satisfies all relevant criteria of Policy BE1, delivering a high-quality, contextually sensitive, safe, accessible, and sustainable development that enhances the character of New Road and contributes positively to the town centre of Skewen.

4.5 POLICY TR2 – DESIGN AND ACCESS OF NEW DEVELOPMENT

4.5.1 Policy TR2 of the LDP sets out clear requirements for the design and accessibility of all new development proposals. The policy outlines that development will only be permitted where it does not compromise the safe and efficient use of the highway network, provides appropriate levels of parking and cycling infrastructure, is accessible via a range of transport modes, and, where relevant, is supported by appropriate Transport Assessments or Travel Plans. The proposed redevelopment of the former bank building on Station Road complies with the aims of Policy TR2.

4.5.2 In line with Criterion (1), the proposed development will not compromise the safe and efficient use of the highway network and will not generate unacceptable traffic levels. The conversion of the upper floors into Emergency Refuge Accommodation, combined with the retention of the ground floor offices, represents a modest scale of development. Any vehicle movements generated can be easily accommodated within the existing road network in Skewen, with no adverse impact on highway safety. The absence of visitor trips and the expectation of very low car ownership among residents further minimises any potential traffic impact.

4.5.3 With respect to Criterion (2), appropriate levels of parking and cycling facilities are provided. Six off-street parking spaces are proposed to the rear of the building, and secure cycle storage is included to promote sustainable travel. **Further details on parking provision, demand, and sustainability are provided in the in the next section**.

4.5.4 In accordance with Criterion (3), the site is highly accessible by a range of transport modes. Pedestrian and cycle routes are safe and convenient, and the site is well connected to frequent bus services in Skewen. Residents benefit from excellent access to nearby public transport hubs, supporting reduced reliance on private vehicles.

4.5.5 In summary, the proposed development fully meets all relevant criteria of Policy TR2. It ensures safe access, provides appropriate parking and cycling infrastructure, promotes sustainable transport, and makes efficient use of the existing transport network within Skewen town centre.

4.6 NPT PARKING STANDARDS (OCTOBER 2016)

4.6.1 The following section draws upon policies of the NPT Parking Standards document in order to assess the parking provision of the development site at 41 New Road, Skewen.

"In assessing the parking requirements for a particular development, the planning authority will need to take into account a number of factors in relation to the

development and its location. These are listed below. However, it should be noted that some of these factors are outside direct planning control, e.g.: -

- *accessibility to and the service provided by the public transport system;*
- *the availability of private buses or the extent of car pooling;*
- *the relative proportions of full time / part time / local catchment of labour;*
- *accessibility by walking and cycling;*
- *the existing and possible future congestion in streets adjacent to the development; and*
- *accessibility to and the availability of public and/or private car parking space in the vicinity."*

4.6.2 Figure 21 below illustrates the sustainability criteria referred to above for which points are awarded:

Sustainability Criteria	Maximum Walking Distance	Single Sustainability Points
Local Facilities		
Local facilities include a foodstore over 1000m², post office, community medical practice, primary / secondary school etc. Access to two of these within the same walking distance will score single points, whereas access to more than two of these will double the points score.	200m 400m 800m	3 pts 2 pts 1 pt
Public Transport		
Access to bus stop or railway station	300m 400m 800m	3 pts 2 pts 1 pt
Cycle Route		
A cycle route needs to be segregated from vehicular traffic and must provide links to local facilities and employment areas.	200m	1 pt
Frequency of Public Transport	**Frequency**	
Bus or rail service within 800m walking distance which operates consistently between 7am and 7 pm. Deduct one point for service which does not extend to these times.	5 minutes 20 minutes 30 minutes	3 pts 2 pts 1 pt

Figure 21 – Sustainability Criteria

4.6.3 NPT Parking Standards indicates that sustainability points are awarded based upon two or more local facilities being within the same range from the site, with within 200 metres walking distance being awarded 3 points, 400 metres – 2 points, and 800 metres – 1 point. If there are more than two local facilities in a distance range, then the score can be doubled.

4.6.4 In line with the sustainability criteria shown in Figure 21 above, 41 New Road is situated at the following distances from local facilities:

Local facility	***Distance from the application site***
One Stop Skewen (Convenience Store)	16 metres
Evri Parcel Shop (Courier Service)	16 metres
Jenkins Bakery	22 metres
Well Pharmacy	32 metres
Holy Zafran Indian Restaurant	35 metres
The Aesthetics Nurse (Health and Beauty Shop)	35 metres
Taffy's Barbers	29 metres
Bentons Cards (Candle Shop)	38 metres
The Colliers' Arms	54 metres
Sweet Delights (Sweet Shop)	50 metres
Lewis & Co Floral Design (Florist)	72 metres
Sweet Dreams Beds (Bedroom Furniture Store)	86 metres
Marmaris Pizza (Takeaway)	74 metres
La Casona (Restaurant)	90 metres
Auto Electrical Services (Vehicle Repair Shop)	90 metres
Knights Queens Road Pharmacy	120 metres
Jonny Blades (Barbers)	130 metres
Kitchen Wizard (Kitchen Furniture Shop)	130 metres
Skewen Medical Centre	140 metres
Skewen Post Office	150 metres
Salvation Army (Church)	150 metres
Wok 2 Yip (Takeaway)	160 metres
Skewen Chinese Takeaway	180 metres
DLM Hair Lab (Hairdressers)	200 metres

Leo Eye Centre (Opticians)	220 metres
Tabernacle Surgery	230 metres
China Chef (Takeaway)	230 metres
Little People Day Nursery	240 metres
Sim's Fish & Chip Shop	250 metres
Skewen Launderette	250 metres
Cresci's Café	270 metres
Baptist Chapel	290 metres
Skewen Library	300 metres
Y Capel	300 metres
Methodist Church	350 metres
Morrisons Daily (Convenience Store)	350 metres
Skewen Karate Club	350 metres
Gorphwysfa Chapel	350 metres
Skewen Police Station	450 metres
Coedffranc Primary School	550 metres
St Mary's Church Community Centre	550 metres
Ysgol Gynradd Gymraeg Tregeles	600 metres
Memorial Park Bowling Greens	650 metres
Memorial Hall (Community Centre)	650 metres
Memorial Park Skate Park	700 metres
Memorial Park Lido	700 metres
Memorial Park Tennis Courts	700 metres
Memorial Park BMX Track	750 metres
Memorial Park Artificial Turf Football Pitch	750 metres
Skewen Cricket Club	800 metres
Memorial Park Basketball Court	800 metres

Table 1 – Local Facilities Near the Application Site

4.6.5 As indicated by Table 1 above, the application site is well served by a wide range of local facilities within 200m, 400m and 800m. Based on the proximity thresholds set out in the NPT Parking Standards, the site achieves **a minimum of 10 sustainability points**. This is calculated from its location relative to:

- **Skewen Medical Centre** – 3 points (<200 m)
- **Skewen Post Office** – 3 points (<200 m)

- **Skewen Library** – 2 points (<400 m)
- **Coedffranc Primary School** and **Ysgol Gynradd Gymraeg Tregeles** – 1 point (<800 m)
- **St Mary's Church Community Centre** and **Memorial Hall Community Centre** – 1 point (<800 m)

4.6.6 Importantly, as Table 1 demonstrates, the site lies within 800m of **many additional facilities**. However, since "local facility" is not explicitly defined within the NPT Parking Standards, **10 points represents the minimum score**, with the true score likely to be higher given the number of services within walking distance.

4.6.7 Moreover, as outlined by the sustainability criteria shown in Figure 15 above, points are awarded or deducted in terms of the frequency of public transport. The service must be consistent between the hours of 07:00 and 19:00. One to three points are awarded on services operating every 5 to 30 minutes respectively.

4.6.8 Table 2 below shows the distance of nearby bus stops to the application site, the bus services they offer and their frequency.

Public transport	**Services**	**Distance from the host dwelling**	**Frequency of services**
Colliers' Arms bus stop	34, 38	70 metres	Every 30 minutes
Skewen railway station	Cardiff Central, Pembroke Dock, Swansea	350 metres	Every hour

Table 2 – Public Transport Near the Application Site

4.6.9 As shown, in terms of public transport, the *Colliers' Arms* bus stop is located at 70 metres distance of the application site and provides the 34 and 38 bus services which run every half hour. This proximity earns **3 points,** while the frequency earns a further **1 point**. Additionally, Skewen railway station is situated 450 metres distance of the host dwelling and offers services which run every hour, earning a further **1 point**.

4.6.10 As a result, the host dwelling scores a total of **3 (*Colliers' Arms* proximity) + 1 (*Colliers' Arms* frequency) + 1 (Skewen railway station proximity) earns a total of 5 points** for public transport.

4.6.11 In summary, 41 New Road has achieved a **minimum of 10 (local facilities) + 5 (public transport) = 15 points**, which is sufficient for a **parking reduction of at least 30%** in accordance with the CSS Parking Standards (2014), as shown in Figure 17 below.

Sustainability Points	Parking Reduction
Residential Developments	
10 pts	2 spaces per dwelling
7 pts	1 space per dwelling
All Other Developments (other than shops and retail warehouses)	
10 pts	30%
7 pts	20%
5 pts	10%

Figure 13 – Policy Regarding Reductions in Parking Requirements

4.6.12 Therefore, the application site is regarded as being at a sustainable location where a **parking reduction of 30% is in line with local planning policy**.

Parking Requirement Assessment

4.6.13 As previously mentioned, NPT Parking Standards do not set specific parking requirements for Emergency Refuge Accommodation. The closest comparator is Residential HMO, which require:

3 spaces for the first 6 bedrooms, and one space per room thereafter.

Therefore, a 14 bed HMO would require 3 spaces for the first six rooms, and 8 spaces for the remaining 8 rooms. Being a total of 11 spaces.

However, given the sustainable location of the property, a 30% reduction could be applied, thus reducing the number of required spaces to 7 spaces.

4.6.14 However, this calculation would not accurately reflect the operational nature of Emergency Refuge Accommodation. The accommodation proposed at 41 New Road is not conventional residential accommodation. It provides short-term, emergency overnight refuge for individuals in acute housing crisis – typically those with **low or no income** who are, by definition, **unlikely to own or have access to a private vehicle**. Crucially, visitors are not permitted or generated by the operation of the refuge, and the small internal room sizes reinforce the short-term, non-habitable, non-residential nature of the use.

4.6.15 For these reasons, the application of apartment parking standards would not reflect the actual transport demand associated with this form of accommodation. Accordingly, Note 5 of Section 4 of the NPT Parking Standards is directly relevant, stating:

"For developments where clear evidence has been supplied that car ownership levels will be lower than normal, a more flexible approach to numbers of parking spaces may be taken."

4.6.16 Accordingly, while a comparable apartment development on the application site would ordinarily require a total of 7 car parking spaces, it is respectfully requested that the Local Planning Authority adopt a more flexible approach in this case, **given the significantly reduced demand for private vehicle use associated with Emergency Refuge Accommodation.**

4.6.17 In regard to the office portion of the development, NPT Parking Standards requires a minimum of 1 space per 20m² for properties which are less than 1000m² in Zones 2 & 3. The office space within the proposal measures approximately 30m², therefore requiring two car parking spaces, which has been allocated in the rear carparking area as part of this proposal.

4.6.18 The proposed development provides a **total of six car parking spaces**, with **two designated for the office use** and the remaining **four serving the Emergency Refuge Accommodation**. Although this figure is lower than the reduced requirement of 7 spaces if a HMO was proposed, the provision is nevertheless proportionate and

appropriate given the specific operational characteristics of the facility. Residents occupy the accommodation only on a **short-term basis** and are **unlikely to own or rely upon private vehicles**, and the operation of the refuge **does not permit visitor access**, thereby further limiting parking demand. The two staff spaces ensure convenient and safe access for employees, while the overall level of parking aligns with the flexibility permitted under the NPT Parking Standards for developments with demonstrably low levels of car ownership.

4.6.19 The Council took a flexible approach when considering the redevelopment of the identical proposal at 49 Talbot Road in Port Talbot. It has no off-road car parking provision, but nevertheless, the highly sustainable location of that property, couple with the type of accommodation being formed was sufficiently to allow flexibility when requiring parking provision.

4.6.20 An occupancy condition was imposed upon Planning Permission P2021/0549 which reads:

"The residential accommodation hereby approved shall only be occupied as 'emergency accommodation', which shall at all times be operated and managed only by a Registered Charity who occupies the ground floor offices within the property, and in full accordance with the provisions stipulated within the 'Management Plan for Emergency Refuge Accommodation' hereby approved, which shall be implemented at all times."

Reason: In order that the use may be managed in the interests of residential amenity and community cohesion, and to accord with Policy BE1 of the adopted Local Development Plan.

It is submitted that this Planning Statement forms a Management Plan in the context of that proposed at 41 New Road in Skewen, and identical condition could be applied.

5.0 CONCLUSION

5.1 The proposed development represents an opportunity to provide an emergency refuge facility on a previously developed site within the settlement of Skewen. The scheme makes efficient use of the site while ensuring that the local character of the area is respected.

5.2 The proposal will deliver a much-needed emergency refuge to support vulnerable individuals within the local community. By providing safe, accessible, and well-designed accommodation, the development meets a demonstrable social need and contributes positively to community cohesion in Skewen.

5.3 The design of the development has been informed by the character of the existing site, the surrounding streetscape, and the broader urban context. The proposal is sympathetic in terms of scale, appearance, and layout, and will not result in any adverse impacts on neighbouring amenity, visual appearance, drainage, biodiversity, or highway safety. Features such as safe pedestrian access, secure parking, and connectivity to public transport further support sustainable and safe use of the facility.

5.4 In summary, the proposed development represents a high-quality, sustainable, and contextually appropriate emergency refuge that addresses an identified local need, supports the wellbeing of vulnerable individuals, and enhances the community infrastructure of Skewen. The proposal is fully compliant with relevant policies of the LDP, and it is therefore respectfully requested that the Local Planning Authority grant planning permission for the development.