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Good afternoon Rhodri,

We write in relation to the above application, and to the receipt of your e-mail / letter dated 27th February.

Firstly, we note that you have amended the description of development without the Applicant or Agent's consent.

You have re-worded it to "*.....the change of use of the building from an office to 14 emergency refuge flats.*"

The application does not seek permission for flats as explained in the Supporting Planning Statement to the application, and completed forms.

It seeks full planning permission for "*Retention of Ground Floor Offices and Conversion of Upper Floors to Emergency Refuse Accommodation, with Three-Storey Rear Extension.*"

The concept of a recognised Charity working from a ground floor office, administering upper floor accommodation in the form of an emergency refuse has already been accepted and implemented at Station Road in Port Talbot, with the same Applicants and Charity involved as this current property in Skewen.

It therefore stands to logic that when faced with an application with your description, including the words "flat" and number of bedrooms, that your colleagues in Highways would naturally take a view that a form of independent living was taking place. The facility is managed by the Charity, providing short-term accommodation, be that days, weeks or a month to persons who would otherwise be homeless. The initiative at Port Talbot, and this proposal at Skewen have the full support of your Housing colleagues. They regard the type of accommodation as highly needed in the identified communities to enable single people to "seek shelter" in a controlled accommodation, managed by specialist and professional staff who are able to police and regulate attendance at the facility.

The facility at Station Road has no off street parking provision, but like the property at Skewen is located in a highly sustainable location, where facilities are freely available on foot, cycle, and where public transport is abundant.

Evidence borne out of the Port Talbot accommodation verifies that residents do not have the means to own a car, and thus at that facility there is no parking demand. At New Road, the facility does benefit from a total of 7 car parking spaces as presented in the attached site layout plan.

You will note that unlike flats, the accommodation is very modest in floorspace, compact and functional, but specifically not intended to provide a permanent home for those individuals.

The Planning Statement has been checked, and apart from one line on page 11, there is no reference to the proposal being considered as **Use Class C3b**.

The property stands two doors distant from No.38 New Road which exhibits a rear floor extension standing at a full three-storeys with single window opening to upper floor. The proposals seek to mimic that extension, and have been revised from the original submission to now only have one window opening, which has consequently reduced the number of rooms to 13 in total.

The proposed extension has also been revised in length by 1.6 metres to enable it to lie a minimum distance of 3.0 metres from the public foul sewer that crosses the site.

By realigning its length, the extension does now NOT interfere with a calculated 45 degree line of repose from the centre of the nearest neighbour's window at No. 40 New Road. That angle is shown on the site layout plan, and the resized extension does not break that line, thus enabling that neighbour's right to light to be preserved.

The reduction in size has also allowed an additional car parking space to be formed in the rear yard.

We will provide, under separate cover, a Management Plan to describe how the Charity will operate the facility at New Road. However, you should note it will be identical in form to the facility at Station Road in Port Talbot.

We note your comments on the use of white upvc as a replacement window form to the front facade. However, the property is not listed, nor lies in a Conservation Area.

The dominant window finish is white upvc upon an extensive length of street scene, and therefore in this context the use of that modern material will be inconsequential to the visual amenities of the locality.

Contrary to your comments, the proposals include sage and secure cycle storage, allowing residents to access via the rear access.

Adequate waste storage is provided at the lower ground floor which allows it to be carried out to the rear access where the refuse lorry can collect it, as it passes along the rear lane.

We look forward to your consideration of the revised plans, and the correct description of development being reverted to when re-consulting Highways.