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13th February 2026

fao. Planning

address. Neath Port Talbot Council,
Brunel Way, Briton Ferry,
Neath,
SA11 2GG

Dear Claire,

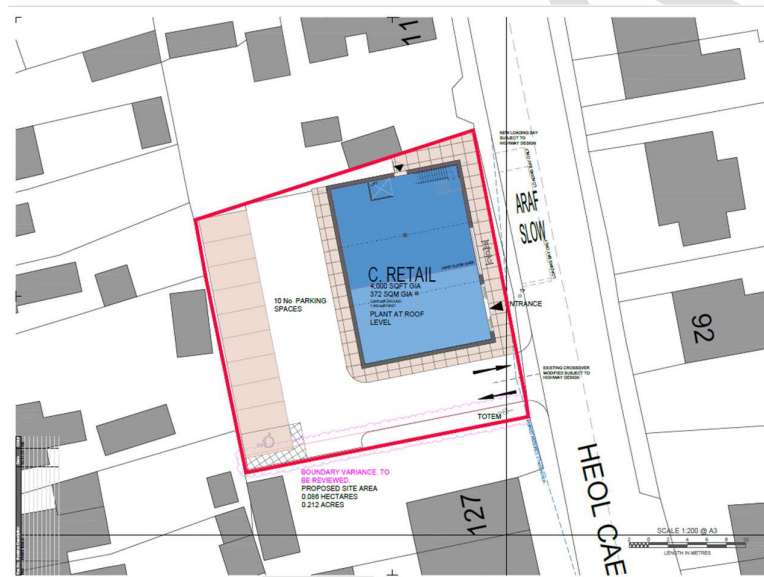
121 Heol-Cae-Gurwen, Gwaun-Cae-Gurwen, Ammanford, SA18 1PD

Further to our recent meeting, and your agreement to leave the pre-application enquiry open, please find below the additional information regarding the following proposal:

"The proposed demolition of the former club and its redevelopment as a retail food store (Tesco Express) facility."

Revised Site Plan

Taking into account the feedback provided at the pre-application meeting, in respect to the siting and positioning of the built form within the site, a revised site plan has been prepared. The updated layout brings the store to the main street frontage, and includes an increased number of car parking spaces then originally proposed. The revised site plan is provided below for reference.



Revised Site Plan

As shown above, the revised plan now provides 10 car parking spaces, and repositions the store to the front of the street – and substantially on the same footprint of the existing building. These changes directly address the comments raised during the meeting by you in respect to the relationship of the scheme to the road frontage and by associating surrounding residential properties, and by highways – which identified concerns around insufficient parking and overspill onto the already busy street. The position in respect to car parking provisions is also further addressed below when considering the existing lawful use and existing car parking provisions. The repositioned built form also mitigates potential amenity impacts arising from the stores position directly to the rear of existing dwellings.

Existing Arrangement / Lawful use

The lawful use of the existing building is established as an events venue, having historically operated for wedding receptions, private parties, discos, and similar social functions. Research of the premises, and dialogue with long-standing local residents, confirms that the existing building operated as a very busy club (in particular on weekends), with regular shows/events being ran. During the week the premises hosted darts, pool, and other events, while bingo was held twice a week (Tuesday and Thursday).



As can be seen from the sketch above, the existing site historically could have operated with only four on-site parking spaces, despite the former building being capable of accommodating anywhere up to 80 occupants at peak use. In contrast, the proposed Tesco convenience store is expected to generate a significantly lower on-site demand, with an estimated 10–15 customers during the busiest periods. Moreover, the site's previous use (events, parties etc.), attendees of would typically spend significantly more time on-site than "top up shopping" convenience shoppers.

In light of the above, the proposed development represents a substantial improvement in the ratio and proportion of parking provision relative to anticipated site activity, ensuring that parking demand can be accommodated within the site and reducing the likelihood of any overspill onto the street. The proposed development will as such represent a betterment in respect to parking provision.

Alternative Potentially Sequentially Preferable Site (Water Street)

During the pre-application meeting, an alternative site on Water Street was raised as a potentially preferable site in sequential terms. Following the meeting, we contacted the developers who secured approval for application ref.

P2022/0726, relating to the proposed 'Residential development of 10 dwellings with associated parking and works'. This application was approved on 12 December 2024.

They confirmed the following: *'Our intention is to develop the site for residential houses as per the approved planning.'*

Given this, it is clear that the Water Street site is not available for alternative (retail) use, nor is there any indication that the developers intend to deviate from the approved residential scheme. As such, this site cannot be considered a suitable, available or viable option for accommodating the proposal.

In the absence of any other sequentially preferable sites (as confirmed in the meeting), it is the case that the enquiry site is the only available site capable of accommodating the proposal. Notwithstanding this, we are of the view that the enquiry site is conveniently located – being accessible to, and well connected to, the centre.

Current Condition and Appearance of the Site

The current condition of the building should be given consideration when redevelopment of the site is proposed.



As demonstrated in the extracts above, the building is run-down, littered, and in a condition that is detrimentally affecting the character of the surrounding area. While this alone does not automatically justify granting planning permission, appropriate consideration and weight should be given to the impact of the current building and site on those living in the locality.

The proposal will bring about the long-awaited redevelopment of the site, with considerable benefits to the visual and residential amenities of the surrounds.

Retail Need

We discussed in our meeting the need to establish this. That is noted, and we will go about evidencing this as part of any planning application submission.

As we have set out previously, the store proposed is only slightly larger than the (without quantifying need) policy position, and is considerably smaller than the TAN4 size. In addition, there is considerable evidence of leakage of expenditure from the area, with the community providing a charity-run bus service to transport residents to other nearby centres. It is also clear that the existing food stores in the vicinity are over-trading relative to their expected

position. A considerable number of Tesco home deliveries also take place within the area, which is evidence of goods being bought in rather than sourced within the locality.

Whilst a planning application will evidence the position in greater detail, the attached letter from E.J. Hales (Appendix A – E.J. Hales Letter), confirms the long-standing and pressing need and demand for a further store in this location. As the correspondence confirms, E.J. Hales have been Tesco's agents in Wales for over 50 years. It explains how target locations are identified, in particular the identification of areas that are underserved in terms of convenience store provision having regard to catchment, demographics and competition.

The letter also confirms the format of the store being proposed in this instance, namely a limited-offer "top-up" shop. Importantly, it confirms that this location has been a target requirement for over 15 years, but that until recently (and this particular site becoming available) no suitable site had been identified. It sets out the limited existing offer within the locality and the requirement and demand for additional provision. It also confirms that there is Board approval for the scheme, which reflects the operator's commitment to securing a presence in this location. As the letter concludes, the addition of a new, modern, well-configured store that provides a service at a competitive price will only benefit the area and local population.

This evidence provides a compelling account of the need and demand for additional provision in the locality, and expands on what we have set out above and previously in the original submission.

You clarified that your position in respect of retail need was simply to state that the case needed to be made, rather than indicating that there was no case or need per se. As such, drawing on the above, supplemented with additional detail and evidence, we will set out a clear case that there is need and capacity. After all, the intended operator will have undertaken considerable research to identify that there is a 'gap' in provision and a viable commercial trading position in this location, hence their active requirement.

Nutrients

The issue of nutrients/phosphates, and the considerable restrictions that are associated with that, was discussed. As I advised in the meeting, there are now in place tried and tested, and moreover accepted, means and methods of quantifying, evidencing, and thereby satisfying this particular issue. We have in this particular case and instance an existing lawful use, with the potential considerable capacity of that having been set out elsewhere within this submission. The capacity of the premises is considerable, and the flows associated with it would have also been considerable / will be so if the lawful use was reinstated (something that could take place without the need for planning permission of course). It is against this baseline or fallback position that any impact of the proposed development needs to be assessed.

Given the limited provision of toilet facilities within any such store (limited to emergency / less able users / staff facilities only), it is envisaged that the flows associated with the proposed store will be considerably less than those associated with the lawful use. This can and will be demonstrated as we have done on any number of other schemes where a proposal brings about, and involves, the "loss" of an existing building and lawful function. Natural Resources Wales have accepted this on many an occasion, and we are confident that this will not be a constraint accordingly.

Summary and Conclusion

It is considered that the additional information provided above, and in the previously submitted documents, supports and establishes the acceptability of the proposal, which seeks the demolition of the former club and its redevelopment as a retail food store (Tesco Express) facility.

We hope and trust that this additional information, detail and evidence will be factored in your assessment and written pre-application response.

In the meantime, should you have any queries or require anything further then please do not hesitate to contact me.



Geraint John
Director
Geraint John Planning Ltd.

DRAFT