



PLANNING STATEMENT

PROPOSED CONVERSION OF RESIDENTIAL DWELLING (C3) TO

4-BED HOUSE OF MULTIPLE OCCUPATION (C4)

AT

9 HIGH STREET, CWMAFAN, PORT TALBOT, SA12 9BH

on behalf of

Mr D. Phillips

Our Ref: 1292.d

Date: August 2026

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Approved by: Richard Banks

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1.0 INTRODUCTION

- 1.1 Evans Banks Planning has been instructed by Mr. D. Phillips to prepare a full planning application for the change of use of a residential dwelling (C3) to a 4-bed HMO (C4) at 9 High Street, Cwmafan, Port Talbot. The application has been prepared following the decision of Neath Port Talbot County Borough Council (the LPA) to refuse to grant Planning Permission for Planning Applications P2025/0666 and P2025/0871 the latter of which was refused on the 26th of January 2026, which sought permission for the same proposal. A subsequent appeal (CAS-04873-M3Z9G2), was submitted in February 2026, and subsequently dismissed on the 26th of June 2026.
- 1.2 Taking on board the comments of the Inspector, and the specific needs of the Applicant, the scheme has now been adapted to include the necessary requirements set out by the Inspector in their previous Decision Notice, relating solely to the appeal was dismissed solely on one remaining matter: the internal layout at second-floor level. The Inspector identified that the communal living area and the second-floor bedroom were both positioned within the roof pitch, resulting in limited headroom and an arrangement where the occupant of the second-floor bedroom would need to pass through the communal living area to access their dedicated facilities. This was considered to reduce privacy and create an awkward, cramped relationship between spaces. No other concerns were identified.
- 1.3 Importantly, the Inspector agreed with the Appellant on the substantive matters raised by the Council. The Inspector concluded that the proposal would provide acceptable room sizes, adequate natural light and ventilation, appropriate internal facilities, and that the absence of external amenity space would not be harmful. The Inspector also found that the development would not intensify parking demand, would not compromise highway safety, and was located in a sustainable settlement with strong access to public transport, services and active travel routes. In doing so, the Inspector effectively overturned two of the Council's refusal reasons, confirming that the

development was acceptable in principle and compliant with relevant policy in respect of amenity, design, sustainability and parking.

- 1.4 This revised application has been prepared specifically to address the single outstanding matter identified by the Inspector. The internal layout has been fundamentally redesigned so that all communal living functions are now located at first-floor level, where a combined shared kitchen and lounge has been created to serve all four occupiers. As a result, no resident is required to travel to the second floor to access communal facilities. The second floor now contains only private accommodation, comprising a single open-plan bedroom with its own lounge-style seating area, together with a dedicated shower room and drying room accessed from a small landing. This arrangement removes the previous conflict identified by the Inspector, where the occupant of the second-floor bedroom was required to pass through a communal living area to access facilities, and also resolves concerns relating to headroom and the usability of shared space within the roof pitch. The revised layout therefore fully addresses the Inspector's findings in paragraphs 8–10 of the appeal decision, while retaining all elements of the proposal that were accepted as policy-compliant.
- 1.5 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 local planning policy

2.0 SITE DESCRIPTION

2.1 THE SITE

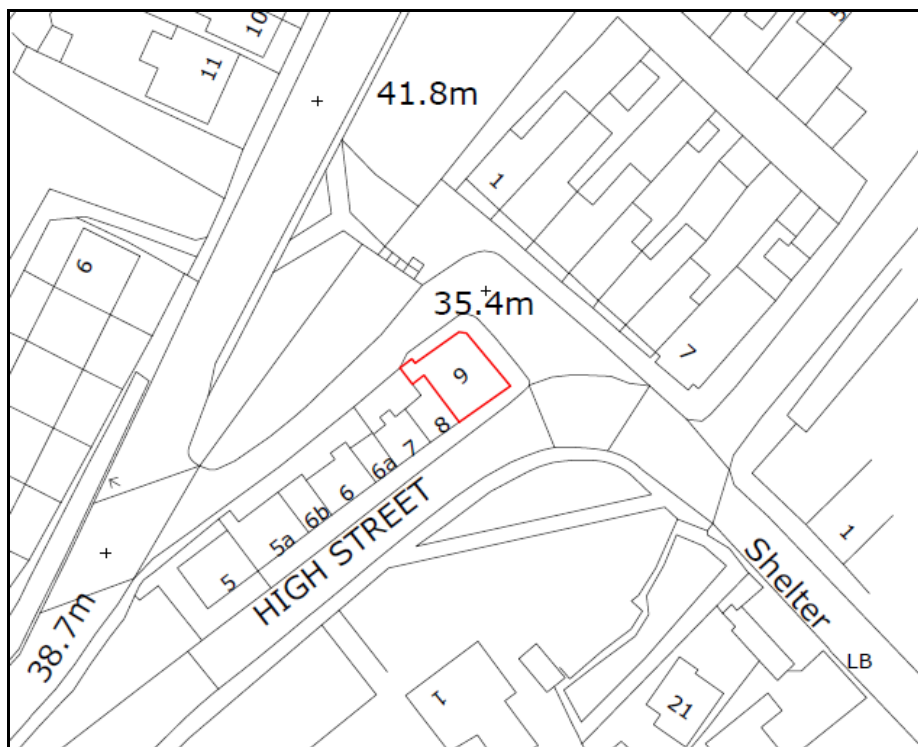
- 2.1.1 The application site relates to an existing residential dwelling at 9 High Street, Cwmafan, Port Talbot. The building is illustrated in Photographs 1 and 2, as well as Plan A below



Photograph 1 – Front Elevation of 9 High Street



Photograph 2 – Rear Elevation of 9 High Street



Plan A – Location Plan

- 2.1.2 The application property comprises an end-terrace building positioned on High Street within a predominantly residential area of Cwmafan. The building rises to three storeys, with second floor within a converted roofspace. It forms a prominent corner element within the prevailing street scene.
- 2.1.3 The ground floor of the property is currently occupied by a commercial unit operating as a barber shop, accessed directly from High Street. The upper two floors contain a self-contained residential apartment arranged over the first and second floors.
- 2.1.4 Pedestrian access to the commercial premises is taken from the principal (High Street) frontage, while the residential accommodation is accessed independently from the rear of the property via the existing service lane.

2.2 THE SURROUNDING AREA

- 2.2.1 As detailed above, the application site (circled red in Photograph 2 below) is located on a residential street within Cwmafan, which lies to the northeast of the larger town of Port Talbot.



Photograph 2 – Google Earth Image

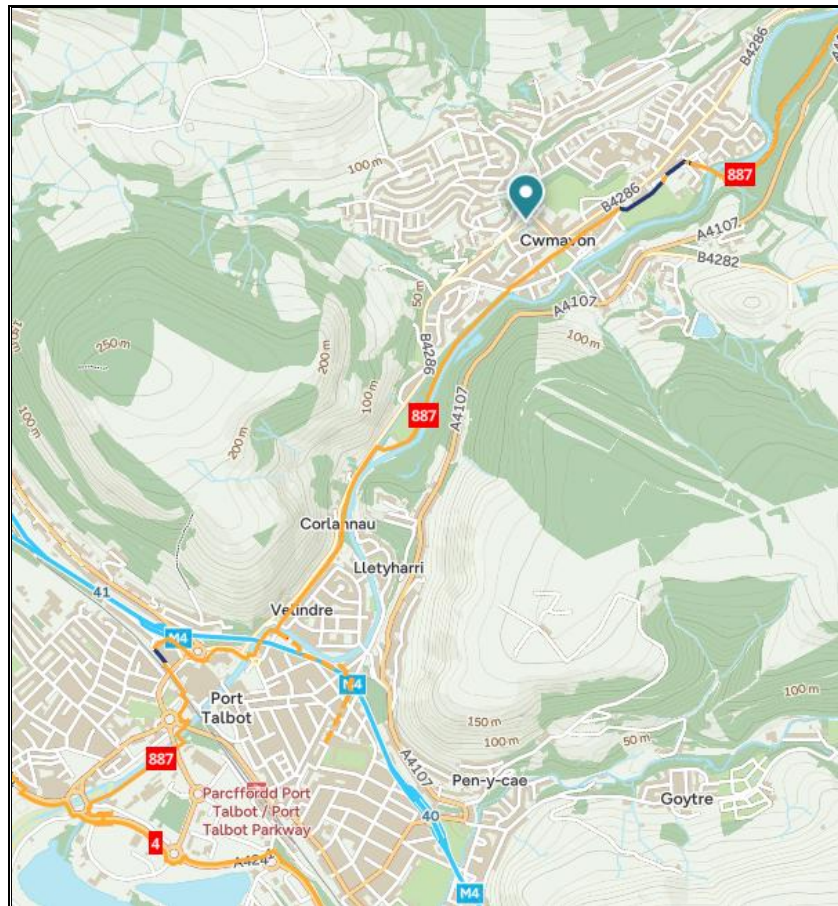
2.2.2 The site at 9 High Street, Cwmafan is well located in relation to existing community facilities, all of which are within easy walking distance for local residents. Key services such as Cwmafan Library, the community hall, local shops, primary school, and nearby recreational areas are all accessible on foot via established pavements and safe pedestrian routes. This high level of walkability ensures that day-to-day needs, social activities, and community functions can be reached without reliance on the private car, supporting sustainable travel patterns and reinforcing the role of the High Street as a focal point for village life.

2.2.3 With regards to bus travel, the 'Gatties', 'Depot Road', 'Cae Glas', and 'Vicarage' bus stops are all located within 200m of the application site, both attended regularly by the services listed below.

- 81
- 83

- 902

2.2.4 National Cycle Route 887 (Port Talbot to Afan Forest Park) runs in close proximity to the site and then connects with National Cycle Route 4 (London to Fishguard) that runs along the A4241, resulting in the site being capable of promoting sustainable travel patterns. The National Cycle Routes and their relation to the site are illustrated in Map A below. Map B shows the abundance of areas accessible within 25 minutes by bicycle.



Map A – National Cycle Network Map



Map B – 25 Minute Cycle Radius

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The proposal is for full planning permission for the conversion of a residential dwelling (C3) to 4-bed House of Multiple Occupation (HMO) (C4). The revised scheme has been prepared specifically to address the matters identified within the appeal decision, and the following information should therefore be read in conjunction with the accompanying drawings.

Project Overview

- 3.2 The conversion will utilise the form of the existing building with no external physical alteration and only minor internal amendments to facilitate the revised layout. The commercial unit at ground floor will remain unchanged. In recognising the site's sustainable location, space at the rear of the building will continue to provide secure cycle storage, ensuring the development promotes sustainable patterns of travel.

Internal Accommodation

- 3.3 As detailed above, the internal layout of the building will remain largely consistent with the previous submissions, but targeted amendments have been made to address the Inspector's concerns relating to headroom, privacy and the functional relationship between communal and private spaces. As a result, the revised internal layout will be as follows:

Ground Floor – Retail Shop with segregated Bin Store and Cycle Store

First Floor – 3 Bedrooms, 3 Shower Rooms, Enlarged Shared Kitchen and Lounge and Drying Space

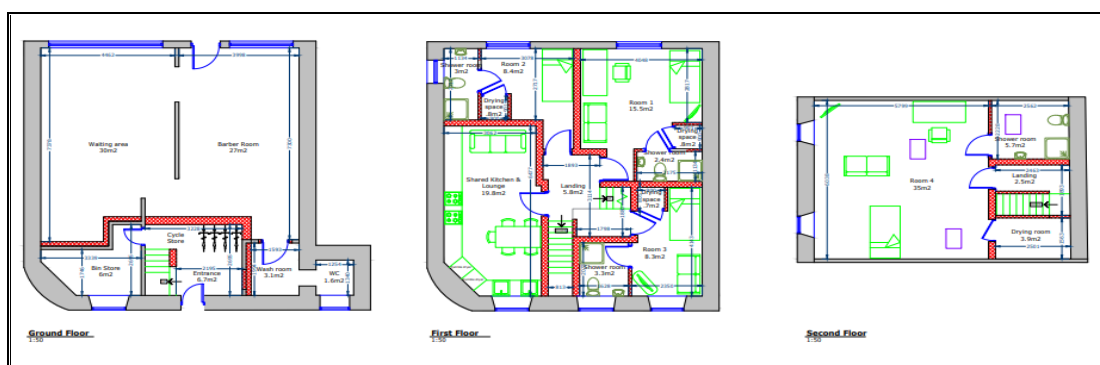
Second Floor – 1 Open-Plan Bedroom and Lounge Space, 1 Shower Room, and Drying Space

- 3.4 The key change within the revised scheme is the relocation of all communal living functions to the first floor, where a combined shared kitchen and lounge has been

created to serve all four occupiers. This ensures that no resident is required to travel to the second floor to access communal facilities. The second floor now contains only private accommodation, comprising a single open-plan bedroom with its own lounge-style seating area, together with a dedicated shower room and drying room accessed from a small landing. This arrangement removes the previous conflict identified by the Inspector, where the occupant of the second-floor bedroom was required to pass through a communal living area to access facilities, and also resolves concerns relating to headroom and the usability of shared space within the roof pitch.

- 3.5 The proposed 4-bedroom HMO has been designed to provide a significant amount of high-quality shared space, exceeding the minimum requirements set out in the NPT HMO Space & Amenity Standards. All bedrooms **comfortably exceed the recommended minimum size range of 6.50–8.36 m² for single occupancy**. The **communal kitchen and lounge areas at first-floor level are substantially larger than the minimum standards**, which specify 11.61 m² for a kitchen and 11.15 m² for a living room, each intended for use by up to five residents. As the proposed HMO will accommodate four people, the shared spaces are proportionally more generous, providing ample room for cooking, dining and socialising. The accompanying floor plans demonstrate that the development offers a high standard of amenity for all future occupiers, significantly exceeding local space and amenity requirements for HMOs.

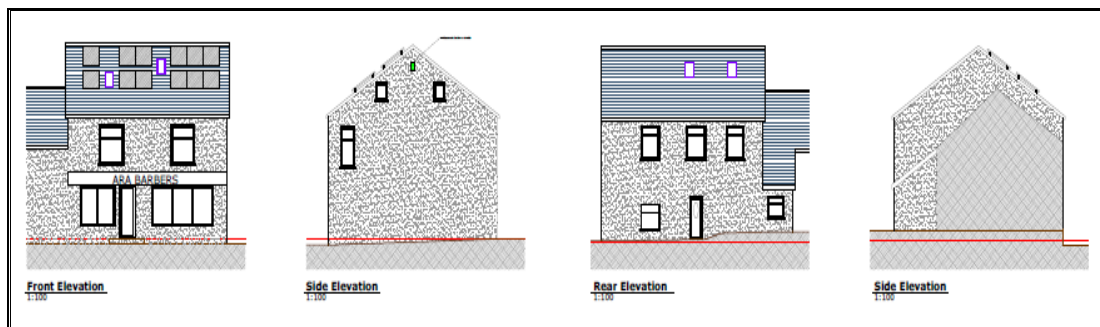
- 3.6 The revised Proposed Floor Plans are illustrated in Plan B below.



Plan B – Proposed Floor Plan

External Finishes

- 3.7 The external finishes of the building will remain unchanged, aside from the addition of a Woodstone Beaumaris bat box to the side elevation, and solar panels to the roof of the front elevation. The Proposed Elevations are illustrated in Plan C below.



Plan C – Proposed Elevations

Drainage

- 3.8 All surface water and foul water will continue to be disposed of as existing, via connections to the public sewer.

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 County Borough Council Local Development Plan (LDP)*.

4.0.2 On the basis of the above, the following policies are considered of particular relevance to the application proposal and so have been given full consideration in its preparation:

- Policy SP3 – Sustainable Communities
- Policy SC1 – Settlement Limits
- Policy TR2 – Design and Access of New Development
- Policy BE1 – Design

4.0.3 In addition to the above, we consider the following ‘Supplementary Planning Guidance’ (SPG) produced by the Local Authority to be relevant to the application proposal, which has therefore also been given due consideration:

- Parking Standards (Oct 2016)
- Design (July 2017)
- CSS Wales Parking Standards (2008)

4.1 POLICY SP3 – SUSTAINABLE COMMUNITIES

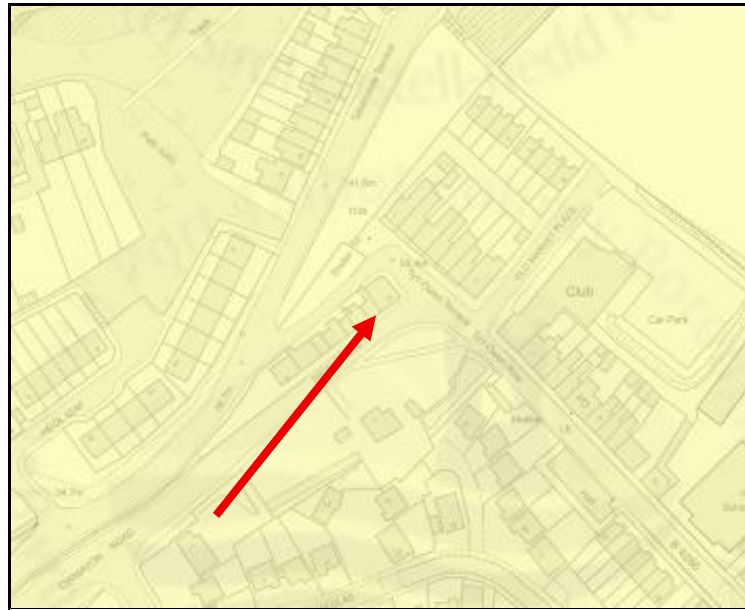
4.1.1 Policy SP3 (*Sustainable Communities*) states that the delivery of “*sustainable, healthy and cohesive communities and the conservation of the countryside*” will be promoted by “*the identification of a settlement hierarchy that reflects the role and function of settlements*”. New development will therefore be steered towards the more sustainable locations of the county.

4.1.2 The proposed development is located within Cwmafan. Table 3.1 of the LDP 'Settlement Hierarchy for Neath Port Talbot' identifies Cwmafan as a 'Large Local Centre' as the settlement has adequate transport links with clusters of one or more retail units and local services, with one or more community facilities and employment provision. It is 3rd out of a 6-tier hierarchy, highlighting that it is considered to be a sustainable settlement by the Authority.

4.1.3 The Inspector confirmed that the *"...property occupies a highly sustainable and accessible location within Cwmafan, with a wide range of community facilities, local shops, services and recreational opportunities within easy walking distance"*. In light of the above, the application site is clearly positioned well within the Settlement Hierarchy and will therefore promote sustainable development in adherence to the requirements of Policy SP3.

4.2 POLICY SC1 – SETTLEMENT LIMITS

4.2.1 The proposed application site is positioned within the settlement limits defined by Policy SC1 (*Settlement Limits*), as shown in Map C below.



Map C – LDP Proposals Map

4.2.2 Policy SC1 states that “*development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle*”. With no change to the external physical form or nature of the application building, and with the Inspector confirming that the principle of residential use was acceptable, it is considered that this development is proportionate in scale to its surroundings and accords with Policy SC1.

4.3 POLICY TR2 – DESIGN AND ACCESS OF NEW DEVELOPMENT

4.3.1 For developments to comply with Policy TR2 (*Design and Access of New Development*) proposals must adhere, as appropriate, to the requirements of four criteria. In the case of this application proposal, we believe that all four are of relevance and an assessment of the application proposal against each now follows.

4.3.2 Criteria 1 requires that proposed developments do not “*comprise the safe effective and efficient use of the highway network*” and do not impact highway safety or create unacceptable levels of traffic generation. The Inspector concluded that “*the proposed*

development would not result in any increase in parking demand when compared with the existing lawful use” and that *“the development would not give rise to any significant adverse impact on highway safety.”* Therefore, with no intensification of the previous proposal, it is considered the site will not experience an increase in levels of traffic as a result of the proposed development, and that traffic levels will remain the same as existing. The proposal therefore adheres to the requirements of the Criteria.

- 4.3.3 Criteria 2 requires that there are appropriate levels of parking and cycling facilities provided and the access arrangements for the site allow for the safe manoeuvring of any service vehicles associated with the planned use. The matter of parking is discussed in detail under consideration of Section 4.5 below. In summary therefore, it is considered that the proposal adheres to the spirit of Criterion 2, as the Inspector agreed that *“the proposal’s sustainable location close to shops and facilities would make the development attractive to non-car owning households and it would incorporate bicycle storage to encourage cycling”*.
- 4.3.4 Criterion 3 requires that development is accessible by a range of travel means. The Inspector noted the site’s *“excellent access to public transport and pedestrian networks”*, confirming compliance with Criterion 3.
- 4.3.5 Criteria 4 requires a Transport Assessment and Travel Plan for developments likely to generate significant traffic generation. The Inspector confirmed that the development would not generate significant traffic movements, and as such a Transport Assessment is therefore not required.
- 4.3.6 In summary therefore, the application proposal fully adheres to the requirements of Policy TR2.

4.4 POLICY BE1 - DESIGN

- 4.4.1 Design is key to the Local Authority as highlighted by Policy BE1 (*Design*). The policy states that all development proposals must be of high-quality design and take into account the natural, historic and built environment and sets out criteria as to how this should be achieved.
- 4.4.2 The outer appearance of the existing building will not be significantly altered by the application proposal. This is considered to be appropriate with its surroundings and remaining properties on High Street which follow a terraced residential format. This ensures it complements and enhances the character and appearance of the building and respects the context of the site and its place within the local landscape, whilst utilising materials appropriate to its surroundings therefore complying with Criteria 1, 2 and 3.
- 4.4.3 The proposed 4-bedroom HMO has been designed to provide a significant amount of high-quality shared space, exceeding the minimum requirements set out in the *NPT HMO Space & Amenity Standards*. All bedrooms comfortably exceed the minimum recommended size range of 6.50 – 8.36 m² for single occupancy. The communal kitchen and living areas are also substantially larger than the minimum standards, which specify 11.61 m² for a kitchen and 11.15 m² for a living room, each intended for use by up to five residents. As the proposed HMO will accommodate **four people**, the shared spaces are proportionally more generous, providing ample room for cooking, dining, and socialising. The accompanying floor plans demonstrate that the development offers a high standard of amenity for all future occupiers, significantly exceeding local space and amenity requirements for HMOs.
- 4.4.4 The Inspector explicitly endorsed this assessment, stating that the proposal “*offers a level of internal space, functionality and residential amenity that substantially exceeds the Council’s adopted standards.*” He further confirmed that room sizes, natural light, ventilation and qualitative amenity standards were all acceptable, and that the absence

of external amenity space did not result in harm. These findings directly support compliance with the amenity-related elements of Policy BE1.

- 4.4.5 The only matter identified by the Inspector related to the internal layout at second-floor level, where the communal living area and Bedroom 4 were both positioned within the roof pitch. He concluded that *“the arrangement would reduce privacy and create an awkward relationship between spaces, with limited headroom affecting usability.”*
- 4.4.6 The revised scheme directly addresses this concern. All communal living functions have been relocated to the first floor, where a combined shared kitchen and lounge has been created to serve all four occupiers. The second floor now contains only private accommodation, comprising an open-plan bedroom with its own lounge-style seating area, together with a dedicated shower room and drying room accessed from a small landing. This arrangement removes the previous conflict identified by the Inspector and resolves concerns relating to headroom and the usability of shared space within the roof pitch.
- 4.4.7 The building will be refurbished and maintained to a high standard, ensuring that its physical condition contributes positively to the character of the locality. By enhancing the appearance of the property and maintaining a safe and well-presented environment, the proposal fully accords with Criterion 6.
- 4.4.8 The proposed development is situated within the designated ‘Large Local Centre’ of Cwmafan, where a full range of essential amenities, services and community facilities are all located within convenient walking distance of the site. The Inspector acknowledged this, noting that the property occupies *“a highly sustainable and accessible location within Cwmafan”*. This highly accessible position promotes active travel and reduces reliance on the private car. As a result, the proposal accords with Criterion 7 by prioritising the needs of pedestrians, cyclists and public transport users, and by maintaining strong linkages with the existing surrounding environment.

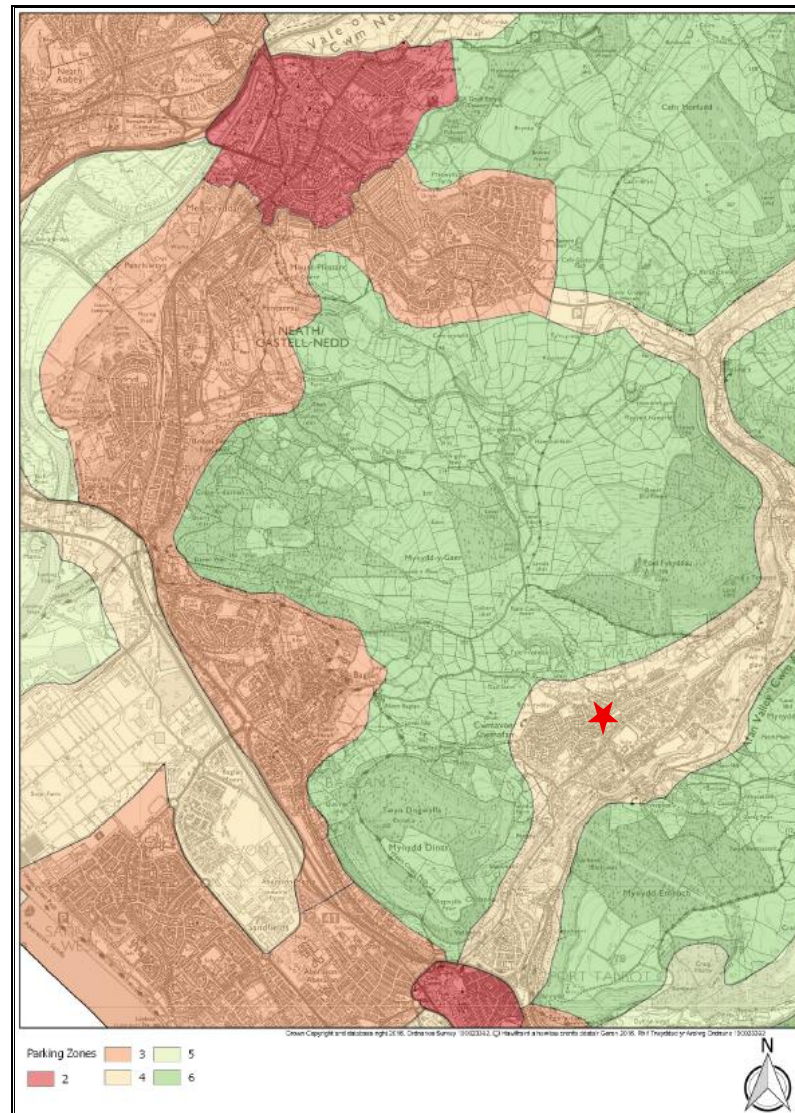
4.4.9 The existing drainage arrangements have been designed to ensure that surface-water run-off and flood risk are effectively managed, while also preventing any risk of pollution. The proposed approach accords fully with the requirements of Criterion 9.

4.4.10 In summary therefore, and with the Inspector's sole concern now fully resolved through the revised internal layout, the application proposal adheres to all relevant criteria and the requirements of Policy BE1.

4.5 PARKING STANDARDS SUPPLEMENTARY PLANNING GUIDANCE

4.5.1 Before turning to the detailed requirements of the Parking Standards SPG, it is important to note that the Inspector considered the matter of parking in full as part of the appeal. He concluded that the proposal would *"not result in any increase in parking demand when compared with the existing lawful use"*, and further that *"the development would not give rise to any significant adverse impact on highway safety"*. The Inspector accepted that the existing three-bedroom residential use relies entirely on on-street parking and that the proposed HMO would generate a comparable level of demand. Notwithstanding these clear findings, the following assessment is provided to demonstrate continued compliance with the adopted SPG.

4.5.2 The SPG sets out the parking requirements for all forms of development, which differ slightly dependant on which Zone a proposed development is located within. The proposed development (indicated by the red star) lies within Zone 4 (Suburban or Near Urban) of the Parking Zone Designation within the SPG (illustrated by Map D).



4.5.3 Within the provisions of the SPG, the site is located therefore within, with Cwmafan being a smaller settlement that provides a range of local facilities. a ‘Suburban or Near Urban’ area is defined in the SPG as being:

“The outer edges of the largest towns; suburban locations in towns; the whole of smaller settlements offering a range of local facilities. There is an at least hourly bus service to the town centre and there may also be a railway station

*in the town. Local facilities include a local centre within 400m walking distance.
Some other basic amenities”.*

4.5.4 The existing residential use (C3) provides a three-bedroom flat with no dedicated off-street parking provision, relying solely on on-street parking along High Street. However, when considering the proposed conversion to a 4-bed HMO (C4), it is noted that the NPT Parking Standards SPG does not contain a specific parking category for HMO uses. Accordingly, the CSS Wales Parking Standards (2008) have been applied, which set out a requirement of **3 spaces** for HMOs with up to six residents. On this basis, the existing C3 use and the proposed C4 use both generate a comparable notional parking requirement. As the current lawful use already operates without off-street parking, the proposal does not introduce any increase in parking demand beyond the established situation. The Inspector confirmed this position, stating that the proposal *“would not intensify parking pressure or materially alter the established parking arrangements for the site”.*

4.5.5 As there is no specific parking requirement for HMO properties in the NPT SPG, the following table has utilised the HMO parking requirement set out in the *CSS Wales Parking Standards (2008)*:

Houses in Multiple Occupation(See note 8)	3 spaces for up to 6 sharing and 1 space per additional bedroom;	1 space per 5 units
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Table 1 – CSS Wales Parking Standards (2008) for HMO's

4.5.6 Based on the above, the existing 3-bed flat (C3) would require a maximum car parking provision of **3 total spaces**. Based on the proposed development (4-bed HMO), the maximum car parking provision would also be **3 total spaces**. With **no change** in the maximum number of spaces required between the existing and proposed use, and with the Inspector confirming that the proposal **would not** intensify parking demand, it is considered that the requirements of the SPG are therefore satisfied.

5.0 CONCLUSION

- 5.1 The proposal is for the conversion of the existing residential accommodation (C3) to a 4-bedroom House in Multiple Occupation (C4), with no external physical alterations and only targeted internal amendments to address the matters identified within the appeal decision.
- 5.2 On the matter of sustainability, as detailed above, the application site is positioned at an extremely sustainable location within the existing urban form. Being within the 'Large Local Centre' of Cwmafan, it has easy access to a range of community facilities via foot, alongside excellent public transport links and non-car access routes. The Inspector recognised this, noting that the property occupies *"a highly sustainable and accessible location within Cwmafan, with a wide range of community facilities within easy walking distance"*. All these attributes ensure that the site and indeed the proposed development is able to fully promote sustainable transport patterns.
- 5.3 In design terms, the proposal does not propose any external physical changes and very little change to the existing internal arrangement. The Inspector confirmed that the development *"offers a level of internal space, functionality and residential amenity that substantially exceeds the Council's adopted standards"*, and agreed that room sizes, natural light, ventilation and qualitative amenity were all acceptable. He also confirmed that the absence of external amenity space would not result in harm, and that the proposal would not intensify parking demand or compromise highway safety.
- 5.4 The appeal was dismissed solely due to the internal layout at second-floor level, where the communal living area and Bedroom 4 were both positioned within the roof pitch. The Inspector concluded that *"the arrangement would reduce privacy and create an awkward relationship between spaces, with limited headroom affecting usability"*. The revised scheme directly addresses this concern. All communal living functions have been relocated to the first floor, and the second floor now contains only private

accommodation, accessed from a small landing. This resolves the Inspector's sole outstanding concern in full.