

DELEGATED REPORT

Application No:	P/24/0046
Site Address:	Storage Depot New Road Dowlais Merthyr Tydfil CF48 3DA
Development:	Conversion of storage unit into 6 holiday lets
Case Officer:	Marlene Ferreira
Site Visit:	7th March 2024
Application Expiry Date:	24th April 2024
Consultation reply date expired:	27th March 2024

APPLICATION SITE

The application site relates to an existing brickwork building located off New Road, in the area of Dowlais. The large building, formerly used as garages in association with a council depot, slopes down gradually from the east to west, since it follows the gradient of the road. Its rear elevation adjoins the existing stone boundary wall which forms both the rear elevation of the building and the boundary alongside New Road. The building appears to have remained unused for a significant period of time.

The site, which can also be accessed via a private road (that also serves a recycling site and storage depot) off Gellifaelog Old Road, is served by an existing access directly off New Road. It adjoins existing residential dwellings to the west, a storage depot to the east, a recycling centre to the north and New Road to the south.

PROPOSED DEVELOPMENT

This application seeks planning permission to convert the existing building into holiday lets with associated access and parking.

The brickwork building would be sub-divided into 6 self-contained holiday lets. The height of the former garage would be slightly increased by approximately 250mm to allow for a new 'warm roof' construction. Internally, it would be partitioned to comprise a ground level and mezzanine floor above. The ground floor would provide a kitchen/dining/living area with shower room. The mezzanine floor would provide a double bedroom.

Other external alterations to the building would include the reconfiguration and widening of the entrance doors and windows to the front northern elevation, and the addition of velux lights within the front (northern) and rear (southern) roof slopes. A new large window and

patio doors is also proposed to the western side elevation, and this would replace the existing roller shutter door (and serve unit 6). Indeed, the plans indicate that the former garage building would be completely renovated and would comprise concrete roof tiles, rendered elevations (a mix of render and stonework to the southern rear elevation) and UPVc windows.

The units would be enclosed from the recycling centre to the north and the storage depot to the east, by a 1.8 metre high fence, and from New Road and the neighbouring properties to the west, by an existing natural stone wall. The units would be served by a grassed amenity area located to the front (north of the holiday lets) and a 12 space car parking area, located to the northwest of the former garage building. The units would continue to be directly accessed off New Road, via the existing entrance, which would slightly widened to approximately 4.5m in width and the existing stone wall would be splayed to improve visibility.

PLANNING HISTORY

The following planning history is relevant to this site:

P/14/0243 – New detached dwelling – Approved: 2nd December 2014

CONSULTATION

Head of Engineering and Highways	No objection.
Town Planning's Policy Officer	No objection.
Council's Ecologist	No objection in principle, subject to further survey work being carried out, and amendments to the enhancement measures proposed, including those set out under the Green Infrastructure Statement.
Environmental Health	No objection subject to standard conditions and contaminated land conditions (given the site's location within 250m of potentially contaminated land).
Welsh Water	No objection subject to surface water conditions, including an advisory note in respect of a water easement area.

PUBLICITY

In accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, letters were sent to nearby occupiers and two site notices were displayed within the vicinity of the site. No letters of representations have been received as a result of this publicity exercise.

POLICY CONTEXT

National Development Framework

- Future Wales: The National Plan 2040 (February 2021)

National Planning Policies

- Planning Policy Wales (Edition 12, February 2024)

Paragraph 3.3 refers to good design and states that *'...design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surroundings area...'*

Paragraph 3.9 refers to character and states that *'...the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process and expressed, when appropriate, in a design and access statement...'*

Paragraph 3.14 refers to context appraisal and states that these *'...should be used to determine the appropriateness of a development proposal in responding to its surroundings. This process will ensure that a development is well integrated into the fabric of the existing built environment...'*

Paragraph 6.4.3 discusses biodiversity and states that *'...the planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement...'*

- TAN's (Technical Advice Notes)

TAN 5 – Nature and Conservation Planning (2009)

This TAN provides advice on development affecting designated sites and habitats, in addition to protected or priority habitats and species. Section 6.2.2 states that *'...It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. It is considered best practice that such a survey is carried out before planning application is submitted. Planning permission should not be granted subject to a condition that protected species surveys are carried out and, in the event that protected species are found to be present, mitigation measures are submitted for approval. However, bearing in mind the delay and cost that may be involved,*

developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of them being present...

TAN 12 – Design (2016)

This TAN advises that the Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment, which is fit for purpose and delivers environmental sustainability, economic development, and social inclusion at every scale throughout Wales. Section 2.6 of TAN12 states that ‘...*Design which is inappropriate in its context, or which fails to grasp opportunities to enhance the character, quality or function of an area, should not be accepted, as these have detrimental effects on existing communities...*’ Section 4.3 of TAN12 points out ‘...*Understanding the site and its immediate and wider context is the basis for a meaningful and sustainable design response, and is the responsibility of all those involved in the design process...*’

TAN 13 – Tourism (1997)

This TAN discusses tourism and states that ‘...*tourism makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas...*’

Local Planning Policies

- Merthyr Tydfil Replacement local Development Plan 2016-2031

Policy SW4 – Settlement Boundaries

Policy SW11 – Sustainable Design and Placemaking

Policy EnW1 – Nature Conservation and Ecosystem Resilience

Policy EnW4 – Environmental Protection

Policy EcW7 – Tourism, Leisure and Recreation Development

Supplementary Planning Guidance (SPG)

Supplementary Planning Guidance Note 4: Sustainable Design (July 2013)

Supplementary Planning Guidance Note 5: Nature and Development (May 2015)

PLANNING CONSIDERATIONS

The issues to consider under the assessment of this application relate to whether the proposal would be acceptable in principle in this location, as well as in respect of its impact on the character and appearance of the area. The impact of the development upon residential amenity, ecology, parking provision and highway safety would also be primary considerations.

Principle of Development

The application site lies within the settlement boundary and the proposed development is therefore in accordance with LDP Policy SW4, which supports new development in this location, provided it complies with other relevant policies.

The proposed use seeks to provide a tourism related development, as such, Policy EcW7 is also a relevant policy consideration, which states that ‘...*tourism, leisure and recreational development within settlement boundaries is generally supported, particularly where they aid the revitalisation and regeneration of the Town and Local Centres...*’

The existing building, formerly used as garages in association with a council depot, has remained unoccupied for a significant period of time. It's proposed use as holiday accommodation would amount to an appropriate use within the designated settlement boundary, which would bring the vacant building back into use and would therefore be welcomed. Whilst it is recognised that the proposed holiday lets would sit in close proximity to an existing bus depot, located to the east, it should be noted this is a private company which operate during daytime hours and within certain times only, i.e. school drop off and pick up times, and as such operate less frequently than public services. It is also acknowledged that the proposed holiday lets would sit in close proximity to the existing recycling centre to the north, however, this is separated and screened from the application site by extensive mature vegetation/trees and operates during the daytime only. Indeed, the proposed holiday lets would also lie adjacent to other comparable uses, essentially the existing residential properties located to the west. As such, the proposed use would be deemed an acceptable proposal within this setting. Certainly, its re-use as holiday accommodation would be far more beneficial as opposed to the building continuously remaining vacant leading to a derelict building in the long-term. In this instance, the proposed development would therefore be acceptable and accord with LDP Policies EcW7.

Character and Appearance

The proposed works largely relate to internal alterations. However, some alternations are also proposed to the outside of the building, and these works would include an increase to the buildings roof height, the addition of new windows and doors (including openings), the application of a new render finish to the front, side and rear elevations, and the installation of concrete roof tiles.

The slight increase to the roof height (approximately 250mm) of the building would amount to a small-scale alteration which seeks to allow for a ‘warm roof’ construction but would not be considered to significantly modify the design of the roof. As such, the proposed increase in the roof height would not cause any significant harm to the appearance of the building. The introduction and widening of windows and doors on the northern front elevation are required to serve the each of the units. Likewise, the proposed roof lights to the front and rear roof slope seek to maximise natural light into the bedroom areas and would also be considered a necessary alteration to allow the building’s proposed use to adequately function.

It is noted that the proposed western elevation would feature a new large first floor window, where its scale and design would not be in keeping with the character and appearance of the original building. Indeed, this was raised as a concern during the pre-application consideration and was requested to be revised prior to the submission of a formal application. However, having considered the overall development and its schedule of works, the proposal as a whole would serve to significantly improve the buildings condition and appearance. Furthermore, the building, which would otherwise fall into further disrepair, would be brought back into use. Thus, on balance, this part of the

development would not warrant the refusal of the application and the addition of the new large first floor window to the western elevation would therefore be considered acceptable.

In respect of the material finishes proposed, it is noted that the existing building is proposed to be rendered to all elevations with a concrete tiled roof. It would be desirable to retain the building's brickwork elevations, since this is reflective of its original appearance and character. However, it is noted that the repointing works associated with this building would be extensive and costly given its large scale. Likewise, it is desirable to install a natural slate or fibre cement roof to replace the existing corrugated sheeting, however, it is also noted that these alternative roof finishes would be more costly than the concrete roof tiles proposed. Having considered the surrounding context of the application site, the proposed elevational and roof finishes would not be viewed as unsympathetic or alien features within this setting. Certainly, the two dwellings adjoining the application site to the west, both comprise rendered elevations with a concrete roof. Thus, the material finishes proposed would sit comfortably when viewed in association with its surroundings and as such, would therefore be considered acceptable.

In terms of the existing entrance point off New Road, this is proposed to serve all users of the holiday lets (since this would provide access off the main road into the proposed parking area). However, the existing access is proposed to be widened and the stone wall either side would be reconfigured to provide a splayed entrance. This part of the development, given the widened access and improved visibility, would also be welcomed and would provide an adequate entrance into the site without causing a harmful effect on the appearance of the street scene.

The proposed development would therefore be considered a sympathetic and acceptable form of development within this area and would therefore accord with LDP Policy SW11.

Residential Amenity

The proposal has been considered in respect of its impact on the neighbouring occupiers, since the proposed holiday lets would have a close relationship with the dwellings at 4 and 5 New Road. However, whilst it is acknowledged that the use of the site for 6 separate holiday units would attract multiple visitors and therefore give rise to noise and disturbance generated from their comings and goings, it should be noted, as discussed earlier, that this existing garage building was formerly used in association with a council depot, and this former use is likely to have caused more noise and disturbance than the holiday lets hereby proposed. It should also be noted that the recycling centre to the north of these dwellings and the petrol station to the west of these dwellings would undoubtedly generate more noise and disturbance than the use hereby proposed. Indeed, no letters of representation were received in respect of this proposal. Likewise, the Council's Environmental Health Section have not raised any objections.

The proposed development would therefore not give rise to any significant detrimental impact upon the privacy or amenities of the nearest occupiers. The proposal would therefore amount to an acceptable development which would accord with LDP Policy SW11.

Ecology

Given the nature of the proposed works, the Council's Ecologist requested that a Preliminary Ecological Appraisal (PEA) and a Preliminary Roost Assessment (PRA) be

submitted in support of the application. A Green Infrastructure statement was also requested to accompany the application.

An ecological report (PEA, PRA and GIS) was received on the 23rd March 2024. The report concluded that the building had low suitability for roosting bats. It specifically states that *'...the workshop/garage has been identified as having low potential to be exploited by roosting bats in spring and summer, with a number of PFR's around the exterior. Whilst hibernation use is discounted, the use by crevice using species, which will tolerate high levels of artificial light, needs to be assessed....'* Further survey work was therefore required to be undertaken.

The Council's Ecologist reviewed the report and did not disagree with the conclusions reached. Thus, the Council's Ecologist provided further comments, requesting that further survey work be submitted in support of the application. The Council's Ecologist also noted that the results of the required survey work would inform any further avoidance, mitigation, compensation, and/or enhancement measures, and would be used, in part, to demonstrate a Net Benefit for Biodiversity. In addition, any proposed lighting would also be informed by the results of the bat survey to be undertaken, and a detailed lighting scheme was also required. Other comments received from the Council's Ecologist focused on additional information in respect of the GIS, including the need for a landscape plan and a long-term maintenance and management plan.

The Council's Ecologist comments and request for further information were sent to the agent. Whilst the agent agreed to provide the additional information, this was not forthcoming. Further updates were sought from the agent on the progress of the additional information required, and the agent pursued this matter with the applicant, however, no further correspondence from the applicant has been received by the agent. As such, the agent has not been able to submit the outstanding ecology information. Thus, the application can only be determined based on the information that has been submitted to date, which in this instance, does not address the conclusions reached in the submitted reports or the comments raised by the Council's Ecologist.

Whilst it is acknowledged that the survey work in respect of the site was not submitted in support of the application (as discussed above), and would be required as part of the application assessment and consideration (as set out in Planning Policy Wales (edition 12)), it is also reasonable to conclude, that in the event that a survey was carried out, it is very likely that the other remaining items in need of clarification and/or amendments, could be secured by a suitably worded condition. In this instance however, the information has not been forthcoming and in the absence of further survey work, it is not possible to discount the use of the building by bats. Thus, the Council's Ecologist is unable to adequately confirm that the proposal would not give rise to an unacceptable adverse ecological impact. As such, the proposal would not accord with LDP Policy EnW1.

Parking Provision and Highway Safety

The proposed holiday lets would be accessed via a widened and improved access off New Road and would be served by a parking area comprising of 12 parking spaces, including an on-site turning area.

The Head of Engineering and Highways has considered the proposed development, and given the scale of the proposal, the associated access provision off New Road and the level of on-site parking proposed in association with the units, the proposed development

would be considered acceptable. The ample on-site spaces provided and large manoeuvring area, would allow vehicles to turn within the site and leave the site in forward gear, preventing any reversing movements onto the highway. In addition, the entrance point into the site would be widened to approximately 4.5m and this combined with the repositioning of the stone wall, would allow for improved visibility when leaving the site.

The Head of Engineering and Highways has therefore concluded that there are no concerns or objections in respect of highway or pedestrian safety, and the proposal would therefore accord with LDP Policy SW11.

CONCLUSION

The proposed development could amount to an acceptable proposal, however, insufficient information has been provided to adequately demonstrate that the proposal would not result in an unacceptable adverse ecological impact, nor has it been demonstrated that an adequate and appropriate net benefit would be provided in respect of biodiversity. As such, the proposed development would not accord with the relevant LDP Policies.

Finally, the duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 ("the WBFG Act") has been taken into consideration when determining this application. In reaching the following recommendation, the ways of working set out at section 5 of the WBFG Act have been considered and thus the proposal is in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers well-being objectives set out as required by section 8 of the WBFG Act.

Accordingly, the following recommendation is made:

RECOMMENDATION: BE REFUSED for the following **REASON:**

1. Insufficient information has been provided to adequately demonstrate that the proposed development would not result in an unacceptable ecological impact. Nor has it been demonstrated that an appropriate net benefit to biodiversity would be provided. As such, the proposed development does not accord with Policy EnW1 and EnW2 of the Merthyr Tydfil County Borough Replacement Local Development Plan.

RECOMMENDATION ENDORSED



Director of Neighbourhood Services

DATE: 27.08.2026