

Consultation Details

Consultee: Peter Thomas
Case Officer: Gareth Davies
Application No: P/26/0023
Application Type: Full Planning Permission
Site Address: 10 - 13 Pontmorlais West Merthyr Tydfil CF47 8UT
Description of Works: Conversion to 8 Studios and alterations to shops with new shop fronts and rear dormer.

Heritage Considerations

☒	Listed Buildings	☐	Scheduled Monuments
☒	Conservation Areas	☐	Historic Parks and Gardens
☐	Historic Landscapes	☐	Other

Recommendation(s)

☐	No objection	☐	Notes for applicant
☒	Object (Holding objection)	☐	Request for further information
☐	Object and recommend refusal	☒	Recommend conditions

Relevant Legislation and Policy Context

This consultation response has been prepared in the context of the duties placed upon the local planning authority by the Town and Country Planning Act 1990 ("TCPA 1990) and the Historic Environment (Wales) Act 2023 ("HEWA 2023).

Section 314A(1) of the TCPA 1990

"In considering whether to grant planning permission for development which affects a listed building or its setting, the Welsh Ministers or a local planning authority in Wales must have special regard to the desirability of preserving—

- (a) the listed building,
- (b) the setting of the building, or
- (c) any features of special architectural or historic interest the building possesses."

Section 160(1) of the HEWA 2023

"In exercising a planning function in relation to a building or other land in a conservation area, a person must have special regard to the desirability of preserving or enhancing the character or appearance of that area."

Note - this is the starting point for assessment of all applications relating to listed buildings and conservation areas

The above raises two primary questions:

1. Would the development affect the historic asset or its setting (and, if so, in what way and to what extent)? and,
2. Would the identified effect preserve (or enhance) the historic asset, in the context of the statutory duty to have special regard to the desirability of preserving it?

The Barnwell Manor Wind Energy Ltd Court of Appeal judgment in 2014 contains important findings which have direct implications for casework where a listed building or its setting is affected or where it involves a building or other land in a conservation area. It held that despite the slight difference in wording, the nature of the duty in relation to listed buildings and conservation areas is the same and that a decision-maker, having found harm to a heritage asset, must give that harm “considerable importance and weight”.

Your report should expressly acknowledge the need, if harm has been found, to give considerable weight to the presumption that preservation is desirable and demonstrate that this has been done. Otherwise, it would not reflect the duty under s314A TCPA 1990 or s161 HEWA 2023. How that balance will be performed will depend on the factors in the case, but it will always be important to recognise the special status which s314A TCPA 1990 or s161 HEWA 2023 confers upon the relevant relationship with heritage assets and conservation areas.

National Policy

National policy is provided in Planning Policy Wales (PPW) Edition 12, which sets out a presumption in favour of the conservation of the historic environment (Chapter 6). This is supplemented by Technical Advice Note 24: The Historic Environment (TAN 24), which requires that any harm to a listed building must be convincingly justified and that alterations must be the minimum necessary and avoid adverse impact on special interest (paras 5.11–5.15).

Relevant guidance from Cadw, including Conservation Principles and Managing Change to Listed Buildings, has been used to inform this assessment where appropriate.

Assessment

Contribution of the Site and Surroundings

The application site forms part of the continuous frontage that defines this section of the Conservation Area. As identified in the Character Appraisal, Pontmorlais West is characterised by dense urban form, buildings set directly at the back of pavement and a strong horizontal emphasis to the street frontage, with upper floors historically in mixed or ancillary use.

While the building contributes positively to the townscape through its scale, plot rhythm, and overall form, the existing ground-floor shopfronts are of mixed quality and include later interventions that detract from architectural coherence. Upper floors have been underutilised, which the appraisal identifies as a recurring issue within the Conservation Area.

Scale, Massing, and Form

The proposal retains the established scale and massing of the building when viewed from Pontmorlais West. The subdivision of the ground floor into smaller retail units reflects the historic pattern of narrow frontages typical of the area and reinforces the fine-grained rhythm of the street.

The rear dormer extension is confined to the rear roof slope and has been designed to avoid any increase in the principal ridge height. As such, it does not interrupt the established roofscape when viewed from the public realm and does not alter the legibility of the historic street frontage.

Materials and Architectural Detailing

The proposed repair and repainting of the existing rendered façade is consistent with the historic use of painted render identified as a defining material within the Conservation Area.

The introduction of new aluminium shopfronts represents a contemporary intervention; however, the submitted details indicate slim-profile framing, a clear hierarchy of elements, and retention of traditional proportions, including a defined signage zone. This approach aligns with the appraisal's recognition that poor-quality modern shopfronts and roller shutters detract from character, and that high-quality replacements can provide enhancement.

The proposal includes the insertion of four new windows at second-floor level and four rooflights within the front roof slope. The existing building, and the wider Pontmorlais West streetscape, is characterised by a clear vertical emphasis to window proportions, which contributes positively to the rhythm and architectural coherence of the terrace.

The proposed square window openings do not reflect this established vertical emphasis and would appear incongruous within the elevation. In particular, the two centrally positioned second-floor windows would introduce an uncharacteristic horizontal emphasis that would disrupt the hierarchy and proportions of the façade. By contrast, the two windows aligned directly above existing openings respond more successfully to the established fenestration pattern and are therefore likely to be acceptable in principle.

The proposed rooflights are located within a roof slope that, due to its pitch and position, limits their visibility from the public realm. As such, they are not considered to result in material harm to the roofscape or wider street scene. However, in order to minimise visual impact and preserve the simple, slate-dominated character of the roof, the rooflights should be flush-fitting conservation-style units, secured by condition.

Effect on Views and Setting of Heritage Assets

The application building is located on the southern side of Pontmorlais West, with the listed former YMCA building positioned on the opposite side of the street to the north. The listed building is visually prominent due to its scale, red brick construction and elevated position

relative to the highway and it is experienced in the street scene as a distinct and largely self-contained element.

The proposed works are limited to alterations to the application building itself and do not involve changes to its height, overall massing or position within the street. As such, the spatial relationship between the application site and the listed building would remain unchanged. The proposed rear dormer is not visible from Pontmorlais West and would have no effect on views towards or from the listed building.

Key views along Pontmorlais West remain unchanged, with the continuous building line and roofscape preserved. The rear dormer does not appear in longer street views and therefore has no material effect on the wider townscape or key vistas identified in the appraisal.

Response to the Conservation Area's Special Interest

The proposal directly addresses several issues highlighted in the Character Appraisal, including the loss of active use on upper floors, the presence of unsympathetic shopfront alterations, and the need for regeneration that works alongside conservation objectives. This weighs heavily in favour of the proposal.

By bringing vacant upper floors back into residential use, improving the coherence and quality of the ground-floor frontage, and retaining the building's overall form and scale, the scheme supports the long-term vitality and architectural integrity of this part of the Conservation Area. The rear dormer, by virtue of its discreet siting, allows viable reuse without eroding the historic street scene.

Conclusion and Recommendation

The proposed works have been assessed in relation to their impact on the special architectural or historic interest of the conservation area. In accordance with Technical Advice Note 24 and Planning Policy Wales, there is a presumption in favour of preserving or enhancing conservation areas.

While the principle of the proposed conversion and the majority of the external alterations are considered capable of preserving the character and appearance of the Merthyr Tydfil Town Centre Conservation Area, the proposal as submitted raises concern in respect of the design and proportions of the proposed second-floor windows on the principal elevation.

The introduction of square window openings, particularly the two centrally positioned windows, conflicts with the prevailing vertical emphasis of fenestration on the host building and within the wider Pontmorlais West street scene. As a result, these elements would detract from the architectural coherence of the façade and would fail to preserve the character and appearance of the Conservation Area.

Accordingly, the application is subject to a holding objection, pending the submission of revised drawings that demonstrate window proportions and alignment which better reflect the established vertical rhythm of the elevation. Subject to appropriate amendments in this

respect, the proposal would otherwise be capable of an acceptable relationship with the character and appearance of the Conservation Area.

Conditions

Should the concerns regarding the windows detailed above be overcome then I recommend the following conditions.

- X. Prior to installation, full details of all new windows and rooflights on the principal elevation shall be submitted to and approved in writing by the Local Planning Authority. Details shall include scaled elevation drawings (1:20), sections, opening method, frame depth, colour and finish. The windows shall thereafter be installed and retained as approved.
- X. The rooflights hereby approved shall be flush-fitting, conservation-style units, set flush with the roof plane, and shall be installed in accordance with the approved details and retained as such thereafter.
- X. Prior to installation, full details of the proposed shopfronts shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:
 - Scaled elevation and section drawings at 1:20 and 1:10;
 - Details of stallrisers, pilasters, fascias, cornices, doors and glazing;
 - Materials, finishes, colours, frame profiles and sections;
 - Details of the signage zone, including illumination (if any);
 - Details of any external roller shutters or solid security grilles.

The shopfronts shall thereafter be installed strictly in accordance with the approved details and retained as such for the lifetime of the development.

- X. Details of all external materials and finishes, including render colour, window frames, shopfront framing, and signage backgrounds, shall be submitted to and approved in writing by the Local Planning Authority prior to their installation. The development shall thereafter be carried out in accordance with the approved details.
- X. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (as amended), no additional windows, rooflights, dormers, or other openings shall be inserted in the building without the prior written approval of the Local Planning Authority.