

Town Planning Division  
Merthyr Tydfil Council  
Unit 5 Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ

BPA Reference 3262

22<sup>nd</sup> October 2025

**Submission of Full Planning for the change of use of 51 Perrott Street, Treharris CF46,  
from a shop to a self-contained flat.**

Dear Development Management

This covering letter accompanies a planning application seeking planning permission for the change of use of the ground floor of 51 Perrott Street, Pentwyn, Treharris, CF46 5ET, from retail (class A1) to residential (class C3), submitted via the Planning Portal under reference **PP-14085423**.

The following drawings and documents accompany the application:

- Site Location Plan (EX(01)00-Site Plan)
- Existing Ground Floor Plans (EX(01)01-GroundFloor-Existing)
- Proposed Ground Floor Plans (L(01)01-GroundFloor-Proposed)
- Existing Elevations (EX(03)01-Elevations Existing)
- Proposed Elevations (L(03)01-Elevations Proposed)

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- Photographs Of Existing (PH(01)\_Photographs\_Existing)
- Photographs Of Existing (PH(01)-Photographs Existing)
- CIL form 1;
- Marketing Report – Paul Fosh Lettings; and
- Covering letter (this document).

### **The Site & Proposal**

51 Perrott Street is a mid-terraced, two storey property fronting Perrott Street within the settlement of Treharris. The ground floor comprises a vacant commercial unit last in use as a print shop. The ground floor has a permitted use as A1 shop, and the first floor is a flat. The ground floor unit has been vacant for some time.

The application seeks planning permission to change the use of the ground floor from a retail shop (Class A1) to a self-contained residential unit (use Class C3).

The ground floor flat would comprise of a single bedroom/bedsit area, living and dining area, kitchen and shower room. It is proposed to retain the existing shopfront with access to the flat via the existing door to the shop, leading to an internal porch.

The site is within the Treharris Conservation area and Terharris Local Centre. It is in close proximity to the Grade II listed Treharris Public Library and Tabernacle Independent Chapel.

### **Planning History**

Planning permission was recently granted for the change of use of the ground floor from a print Shop (A1) to a dessert shop (A3). This change of use has not been implemented.

### **Planning Policy Context**

For the purposes of decision-making, the National Development Framework (Future Wales: the National Plan 2040), National Planning Policy (Planning Policy Wales (PPW)), and Technical Advice Notes are relevant. The Local Plan (LDP) Policy is the Merthyr Tydfil County Borough Council Replacement Local Development Plan (2016 - 2031) with advice contained within Supplementary Planning Guidance (SPG) notes.

### **Planning Assessment**

The key considerations in assessment of the application include:

- The principle of the change of use in this location;
- The impact on the character and appearance of the premises and wider conservation area;
- The impact on residential amenity; and
- Highway safety.

### **The Principle**

The site is within a mixed-use area within a settlement boundary and is therefore acceptable in principle with reference to LP policy SW3 which sets out that new homes will be directed toward existing settlements, and SW4 which seeks to contain development within the urban areas promoting sustainable development and use of previously developed land.

The site is located within the Treharris Local Centre meaning that LDP policies EcW3 and EcW5 are relevant. These policies support development that enhances the vitality and viability of local centre. The proposed use does not fall within the A use class and as a result, EcW5 requires evidence to show that:

- the existing use is no longer economically viable;
- that the proposal would not result in an over concentration of non A1 uses;
- would not result in creation of a dead frontage; and
- would not have an unacceptable effect on amenity and viability of neighbouring uses.

A marketing report prepared by Paul Fosh Lettings is submitted in support of the application. This sets out that the property has been marketed since November 2024 at a rent below prevailing market rents without success. It is also listed on the LPA website for rent.

The marketing report flags that there are a number of commercial properties in the immediate area that are vacant and have been for some time, despite ongoing marketing for rent/sale. It notes the decline in local retail demand within Perrott Street and surrounding areas resulting in part from increased online shopping, reduced footfall and a shift in consumer behaviour. In the expert opinion of the marketing agent, there is little likelihood of a letting and the A1 unit is no longer economically viable.

Turning to the other criteria. The proposal would not result in an over concentration of non A1 uses given that a number of commercial units do still operate from the local centre. It would not result in a dead window frontage given that reuse would result in a more positive contribution than the current vacant and shuttered shopfront. It is not proposed to alter

the existing shopfront other than to remove the existing roller shutter, which is a benefit in terms of provision of an active window frontage.

Finally, a residential use would not have a negative or unacceptable impact on amenity or viability of existing uses. This is already a mixed-use area.

The loss of the print shop might be considered to result in the loss of a community use meaning that LDP policy SW13 is relevant. This requires criteria to be met to justify the loss. In this case the ongoing unsuccessful marketing of the unit demonstrates that the shop unit is surplus to the needs of the community and is no longer required.

At national level, Planning Policy Wales (Edition 12, 2021) supports the efficient use of land and buildings within settlements and encourages housing in accessible town centre locations, creating sustainable and mixed-use communities.

TAN 4: Retail and Commercial Development acknowledges that while Primary Shopping Areas should be protected, changes of use may be justified where there is no realistic prospect of commercial reoccupation and where vitality and viability will not be harmed.

Taken together, these policies demonstrate that the proposed residential conversion would make effective use of a unit that is no longer viable for commercial use, provide new housing in a sustainable location, and preserve the character of both the local centre and the Conservation Area. The proposal, therefore, accords with both the LDP and national planning policy in Wales and is acceptable.

### **Character and Appearance**

The site is within the Treharris Conservation Area meaning that development should preserve or enhance the character and appearance of the area with reference to national and LDP policy CW1. LDP policy SW11 is also relevant as it asks development contributes to

the creation of attractive and sustainable places through high quality, sustainable and inclusive design.

In addition, TAN 12: Design and TAN 24: The Historic Environment stress the need for high-quality design and the protection of heritage assets.

The proposed residential use will involve only modest alterations, including removal of the existing roller shutter blind to the front elevation – an enhancement to current appearance. This together with the retention of the shopfront will ensure the building's appearance is respected and the Conservation Area's special character is safeguarded. By securing an active long-term use, the proposal also prevents deterioration of the building fabric, thereby making a positive contribution to the historic environment

#### **Impact on Neighbouring Amenity**

The change of use to residential accommodation will not have a negative impact on the amenity of neighbouring residents. There are dwellings within the local centre and mixed uses are compatible in town centre environments. There would be no overlooking or loss of privacy.

#### **Highway Safety**

The property does not benefit from off street parking; however, this is also the case for the existing A1 use. The existing use would generate a parking demand in excess of a proposed residential use (staff and shoppers). In addition, the site is in a sustainable location within a local centre and is in proximity to services, facilities and public transport links.

The proposal accords with LDP Policy SW11.

#### **Ecology**

The proposal is for a change of use at ground floor of an existing building. This will not give rise to any impact on ecology given none exists within the site. The proposal would not give rise to any adverse impact on ecology of the site or surrounding area.

There is limited opportunity to introduce ecological enhancements in line with the Environment (Wales Act 2016) and Welsh Government Circular 'Securing Biodiversity Enhancements'. Whilst PPW 12 asks for applications to be supported by Green Infrastructure Statements, given the nature of the development with no external alterations proposed, the submission of a GIS is overly onerous in our view.

The proposal accords with LDP policy ENW1.

### **Summary and Conclusion**

The proposed change of use from a shop (A1) to a residential flat (C3) in Treharris town centre is acceptable when assessed against both the Merthyr Tydfil Replacement Local Development Plan (2016–2031) and Welsh National Policy.

Importantly, it will contribute towards meeting housing requirements under LDP policy SW1 (Provision of New Housing), SW3 and SW4 delivering much-needed accommodation in a sustainable location close to services, shops, and public transport.

The proposal will enhance the character of the conservation area through the removal of the roller shutter to the shopfront and by introducing an active use into a building that has been vacant for many months with little prospect of beneficial occupation. This accords with LDP Policy CW1.

For this reason, the proposal is considered to accord with relevant development policies and national planning policy.

I trust the submitted documentation provides the necessary information to validate and progress the application towards determination. Should you require any further information or discuss any matter pertaining to this application, please do not hesitate to contact me.

Yours sincerely

*George Hopkins*

**George Hopkins**

Assistant Planning Consultant

