

# DELEGATED REPORT

<b>Application No:</b>	<b>P/25/0028</b>
<b>Site Address:</b>	<b>Six Bells Inn Heolgerrig Merthyr Tydfil CF48 1RP</b>
<b>Development:</b>	<b>Conversion from offices (B1 Use Class) to bunkhouse (C1 Use Class)</b>
<b>Case Officer:</b>	<b>Rebecca Owens</b>
<b>Site Visit:</b>	<b>12th February 2025</b>
<b>Application Expiry Date:</b>	<b>1st April 2025</b>
<b>Consultation reply date expired:</b>	<b>28th May 2025</b>

## APPLICATION SITE

The application relates to part of the ground floor of the former Six Bells Inn. It is located in a mainly residential area (although the property also provides a beauticians) and is within the settlement boundary. The site is bound by the main highway through Heolgerrig to the front, other dwellings to the sides and benefits from a rear vehicular access with a large rear garden/hardstanding.

## PROPOSED DEVELOPMENT

Full planning permission is sought for the conversion of part of the ground floor from offices (B1 Use Class) to a bunkhouse (C1 Use Class). The only external alterations would be the insertion of two rooflights in the south western roof plane, the replacement of two existing windows in the south western elevation with windows that are fixed shut and obscure glazed and the installation of a bike wash adjacent to the rear garage.

## PLANNING HISTORY

The relevant planning history is summarised below:

P/24/0279	Conversion from offices to bunkhouse Certificate of lawful use refused on 16 <sup>th</sup> January 2025
P/24/0172	Erect solar panels on the garage at the rear of Six Bells Inn Granted planning permission on 20 <sup>th</sup> August 2024

- P/20/0192 Change of use from store room to Beautician's (sui generis) to include new shopfront  
Granted planning permission on 13<sup>th</sup> April 2021
- P/19/0303 Retention of garage  
Granted planning permission on 13<sup>th</sup> January 2020
- P/13/0026 Change of use from a public house at ground floor into two storage units and from one residential flat at first floor into two residential flats, a new garage to the rear, and erection of access gates to the rear  
Granted planning permission on 24<sup>th</sup> July 2013

## CONSULTATION

The following bodies were consulted and their responses are presented below:

Head of Engineering and Highways	No objection
Planning Policy Officer	No objection
Environmental Health Manager	No objection subject to conditions

## PUBLICITY

In accordance with the Town & Country Planning (Development Management Procedure) (Wales) Order 2012, letters were sent to neighbouring properties and two site notices were displayed within the vicinity of the site.

Two letters of objection and one neutral representation were received following this publicity exercise. The main points raised within these are summarised below:

- The proposal would lead to an intensification of use with a bunkhouse designed to accommodate large numbers of people in addition to the existing beauticians, flat and air BnB property. It would also be a more intensive use than the previous offices, potentially operating 24 hours a day 7 days a week.
- The use is inappropriately located within a residential area and would be more suited to a rural edge of town location where access to cycle trails are more readily available.
- The use would result in noise nuisance from the comings and goings of the visitors along with the loading and unloading of cars and bikes and cycle washing. In addition, there would be noise generated by the large number of people staying at the bunkhouse.
- The existing uses have led to parking issues to the front of the site and parking should be considered and contained to the rear.
- Impact of larger and openable windows which would affect privacy, noise and light into the neighbouring garden and result in the neighbour feeling unsafe due to the windows allowing access into the neighbour's garden with unknown people residing in the bunkhouse on a regular basis. There may also be issues with litter (cigarettes etc.) being deposited into the garden through the windows and potential for the neighbour to injure herself on the open windows in her garden. The larger windows would also remove part of the neighbour's wall and plant life affecting the garden outlook.

- If the windows are operable to be used in the case of a fire they would require access into the neighbours' garden and through their house.
- The new roof lights would be at eye level in the neighbouring garden raising concerns over loss of privacy and access into the garden. They may also attract wildlife such as birds that will cause mess and problems to the neighbouring property.
- Staff would be required to clean the bunkhouse in the same way as they are used for the existing air b 'n' bs
- The feeling of being unsafe not knowing who would be residing next door and the potential for them to be under the influence of alcohol and smoking.

Following an amendment to the scheme to replace the two existing windows in the south western elevation with windows that are of the same size, fixed shut and obscure glazed a further publicity exercise was undertaken. No additional representations were received.

Local ward councillors have been informed of the above concerns raised and the application has not been called in to be presented to the planning committee. As such the application is to be determined under delegated powers by the Director of Neighbourhood Services.

## POLICY CONTEXT

### National Development Framework

Future Wales: the National Plan 2040 (February 2021) sets out a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

### National Planning Policies

Planning Policy Wales (Edition 12, February 2024)

### Local Planning Policies

The following policies of the Merthyr Tydfil County Borough Council Replacement Local Development Plan 2016-2031 are relevant to the determination of this application:

- SW4 Settlement Boundaries
- SW11 Sustainable Design and Placemaking
- SW12 Improving the Transport Network
- CW1 Historic Environment
- EnW1 Nature Conservation and Ecosystem Resilience
- EnW2 Internationally and Nationally Protected Sites and Species
- EnW3 Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species
- EnW4 Environmental Protection
- EcW7 Tourism, Leisure and Recreation Development

In addition, the application will be determined having regard to the advice contained within the following Supplementary Planning Guidance (SPG) Notes:

- Note 4, Sustainable Design.
- Note 5, Nature and Development.

## PLANNING CONSIDERATIONS

The application site is located in a mainly residential area within the settlement boundary. The principle of development is therefore acceptable subject to other relevant planning policies and material planning considerations.

It is noted that no alterations are proposed to the principal elevation and only minor changes are proposed in relation to windows, roof lights and a cycle wash. As such there would be no notable change in the character and visual appearance of the property or indeed impact on the wider area. It is also noted that there is only a limited number of holiday type accommodation in the vicinity of the site and as such the introduction of the bunkhouse would not materially alter the residential character of the area. Having regard to the above the proposal is found to be acceptable in terms of its impact on the character and visual amenities of the area, which it is recognised is within Urban Character Area 9. As such it would accord with Policies SW11 and CW1 of the LDP in this respect.

Regard has also been had for the impact of the proposal on the residential amenities of the neighbouring properties. In this respect it is noted that the immediate vicinity is predominantly residential and the bunkhouse would directly adjoin the dwelling known as 59 Heolgerrig, located to the south west of the site. At present the south western elevation of the application property forms the garden boundary wall of this neighbouring dwelling and features two windows with top opening apertures. It is proposed to replace these windows with non-openable, obscure glazed window units and to insert two roof lights into the south western roof plane. It is considered that the replacement windows would improve the currently situation with the neighbour as these would not be openable and would be obscure glazed, thus preventing any harmful overlooking or loss of privacy to the private garden area. While the roof windows would be openable and would be located facing towards 59 Heolgerrig, these would be at a height above the internal floor level of the bunk house that would prevent views through them into the neighbour's garden. In addition, these roof lights would serve the bedroom area and not one of the main communal spaces. As such, it is not considered that they would result in excessive noise disturbance to number 59 Heolgerrig. Having regard to the above, it is not considered that these alterations would be significant enough to harm the residential amenity of this adjoining property and similarly, no concerns are raised in respect to the other minor alterations proposed.

In terms of the use itself it is recognised that there may be some additional disruption to local residents as a result of the comings and goings of guests and their activities. In addition, it is recognised that people behave differently when on holiday. However, the proposed use of the building would still be fundamentally residential in nature and therefore, it should not generate noise and disturbance significantly greater than that of a large dwelling. Indeed it is noted that the existing use as an office would itself generate comings and going of several people and its previous use as a public house would have generated a significant level of activity which would be expected later into the evening. Notwithstanding the above, any anti social levels of noise and disturbance would be matter for environmental health and/or the police. Thus on balance, it is not considered that there would be a level of activity and associated disturbance that would necessitate the refusal of the application on residential amenity grounds. However, it is recognised that two

letters of objection were received following the publicity exercise. This is addressed in more detail below.

Whilst there is no parking to the front of the property there is an existing vehicular access to the rear via Farm Road (which is an adopted highway and restricted to 20mph) which enters the rear garden area. This is a large area which is entirely hard surfaced with an existing garage. It is noted that the garage was granted planning permission as part of the 2013 application (planning ref: P/13/0026 which also included the conversion of the first floor of the property into two flats. The decision notice included a condition which required this garage to be used only for purposes ancillary to the residential use of the flats to ensure that the parking requirements of the development were adequately met. However, it would appear that the garage was not built in accordance with the approved plans so a further application was submitted in 2019 for the retention of the garage as erected (planning ref: P/19/0303). This was subsequently granted permission but the garage was again subject to a condition which prevented it from being used at any time for any commercial or business purpose. However, the rear yard could provide parking for several vehicles whilst also allowing for these to turn within the site. This is considered to be sufficient provision to meet the need of the proposed bunkhouse and the other uses currently operating at the site, namely a beauticians and two first floor flats. The plans also include cycle storage within the building and it is noted that the site is well served by public transport with two bus stops within 100m. As such there is also opportunities for more sustainable forms of transport. Having regard to the above no objections have been received from the Head of Engineering and Highways and the proposal is found to be acceptable in terms of parking and highway safety.

It is noted that the local planning authority's ecologist has requested a Preliminary Roost Assessment due to the insertion of roof lights which implies the roof space would be used. However, the roof was recently replaced as part of the building's conversion from a public house with the new roof appearing in good condition. Having regard to this and the scale and nature of the development proposed it is considered that this would not be proportionate and as such an informative should be included on any permission issued advising of the protected status of bats and nesting birds.

It is recognised that chapter 6 of Planning Policy Wales (edition 12) requests that applications be supported by Green Infrastructure Statements (GIS). In this instance, due to the scale and nature of the development, which is mainly a change of use with minor external alterations, the submission of a GIS is deemed to be disproportionate and unreasonable. Notwithstanding this, ecological enhancement would be sought and secured by condition, which would contribute to the wider green infrastructure objectives. The proposed development would therefore comply with LDP Policy EnW1.

As noted above, two letters of objection and a neutral representation were received following the publicity exercises. In response to those matters not raised above the following comments are made:

- It is recognised that a bunkhouse is designed to accommodate groups of people but there is only a single bedroom and its size would restrict the number of occupants. It is also acknowledged that the bunkhouse would operate in conjunction with the existing beauticians, flat and air BnB at the property. However, given the size of the property it is not considered that this would be an over intensification in its use.

- It is also recognised that there would be a change in how the property is currently utilised and that a bunkhouse could potentially operate 24 hours a day 7 days a week unlike the previous office use. However, the bunkhouse would be residential in nature so although it may be occupied 24 hours a day and over weekends, its use would be akin to that of a dwelling in terms of the activities of its occupants.
- Bunkhouse uses are often found in both residential and rural areas. As part of the planning application process applications for such uses must be considered on their individual merits to assess whether the proposed located is appropriate. As such the fact that the surrounding area is predominantly residential would not be a reason in its own right to refuse an application for this type of use.
- The use would result in noise nuisance from the comings and goings of the visitors along with the loading and unloading of cars and bikes and cycle washing. In addition, there would be noise generated by the large number of people staying at the bunkhouse.
- The new roof lights would be at a lower level in the neighbours garden due to the differenced in level. However, being in the roof, they would not allow access into the neighbouring garden from the bunkhouse or allow for views into the garden.
- It is recognised that staff maybe employed to clean the bunkhouse but this would be at times when the unit is vacant and as such there would be sufficient parking to the rear of the site to allow for this. It may result in some noise and disturbance but it is not considered that this would be to a level that would be deemed harmful.
- It is recognised that a use of this nature results in different people occupying the property on a regular basis and that these may smoke or consume alcohol. However, it is also noted that the property has previously operated as an office and a public house which would also have resulted in unknown people frequenting the building. In addition, the replacement of the current openable windows with those that are fixed shut and obscure glazed would ensure that there is no access into the neighbouring garden improving security from the current situation and preventing litter from being deposited through open apertures. There would also no longer be any potential for the neighbouring occupier's garden to be impinged upon by open window panes that would cause obstruction or a risk or injury. In addition, there would be no increase in overlooking or loss of privacy from the windows.

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 WCFG 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 WCFG 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 WCFG Act.

Accordingly the following recommendation is made:

**RECOMMENDATION: BE APPROVED** subject to the following **CONDITIONS:**

1. The development shall begin not later than five years from the date of this decision.

**Reason** - To comply with Section 91 of the Town and Country Planning Act 1990.

2. The development shall be carried out in accordance with the following approved plans and documents:

Drawing Title: Proposed Plans & Elevations, Drawing Number: PL002 Rev. 01, Received 28 April 2025

**Reason** -To ensure compliance with the approved plans and clearly define the scope of the permission.

3. **BEFORE WORKS COMMENCE ON SITE** a scheme for biodiversity enhancement, including a timescale for implementation, shall be submitted to and agreed in writing by the local planning authority. Development shall be carried out in accordance with the approved details and retained in perpetuity thereafter.

**Reason** - Future Wales and Planning Policy Wales (Edition 12, February 2024) requires all development to maintain and enhance biodiversity and to accord with Policy EnW1 of the Merthyr Tydfil Replacement Local Development Plan.

4. Before the development hereby permitted is brought into use, the windows serving the bedroom of the bunkhouse shall be non-opening and fitted with obscured glazing, details of which shall first be submitted to and agreed in writing by the local planning authority. The windows shall be permanently retained in that condition thereafter.

**Reason** - In the interest of residential amenity and to accord with Policy SW11 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan

5. The parking area to the rear of the building and existing garage shall remain available for their designated parking use in perpetuity.

**Reason** - To ensure that vehicles are parked off the highway in the interests of road safety in accordance with Policy SW11 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

6. **BEFORE** the use hereby approved commences, the cycle parking areas illustrated on the approved plan (drawing number: PL002 Rev. 01) shall be provided. These shall be retained in perpetuity for the purposes of cycle parking only.

**Reason** - To ensure that there is adequate cycle parking off the highway in the interests of road safety in accordance with Policy SW11 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

## **INFORMATIVES**

1. This planning permission does not provide consent to undertake works that require a European Protected Species (EPS) licence.  
All bats and their roosts are protected under UK and European legislation. It is an offence to deliberately kill, injure, capture or disturb a bat or to recklessly damage or destroy their breeding sites or resting places.

If works are planned on a building/tree in which bats are found to be roosting, Natural Resources Wales (NRW) must be contacted. on 0300 065 3000 or at

<https://naturalresources.wales/permits-and-permissions/species-licensing/apply-for-a-protected-species-licence/bat-licences/?lang=en>.

If work has already commenced and bats are found, or if any evidence that bats are using the site as a roost is found, work should cease and NRW should be contacted immediately.

Under these circumstances, an EPS licence is likely to be required to undertake the works within the law.

2. All birds, their nests and eggs are protected by law under the Wildlife and Countryside Act 1981 (as amended) while they are breeding.

If works to any trees, hedgerows and/or other nesting bird habitat (including buildings with suitable features) are to be undertaken, they will take place outside of the bird nesting season. If the works must be undertaken during the nesting season (generally from 1st March until 31st August, although birds are known to nest outside of these dates in suitable conditions), a breeding bird survey will be required and must be carried out by a suitably qualified ecologist. Any active nests identified will be protected until the young have fledged.

Where a Schedule 1 species (as defined in the Wildlife and Countryside Act - <https://www.legislation.gov.uk/ukpga/1981/69/schedule/1> is involved, compensation for impacts, e.g., loss of nesting sites, will be devised and implemented.

**RECOMMENDATION ENDORSED**



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**Director of Neighbourhood Services**

**DATE: 30.05,2025**