



PLANNING STATEMENT

In respect of:

**CHANGE OF USE FROM RETAIL USE A1 TO
TANNING SALON**

AT

**UNIT 2, LOWER HIGH STREET, MERTHYR
TYDFIL, CF47 8EB**

On behalf of:

Lextan Ltd.

Ref: 2058.c

October 2021

JCR Planning Ltd.

PLANNING • DEVELOPMENT

**Advising the property and
development industry**

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1.0 INTRODUCTION

1.0.1 This planning statement has been prepared by JCR Planning Ltd. on behalf of Lextan Ltd. ('the Applicant') to support an application for planning permission for the change of use from retail (A1) to a tanning salon at Unit 2, Lower High Street, Merthyr Tydfil, CF47 8EB.

1.0.2 The statement considers the application site and its context, together with relevant planning history, and local and Welsh Government planning policy. The following drawings also forms part of the submission:-

- 1196-P01 Location and Block Plan
- 1196-P02 Existing Ground Floor
- 1196-P03 Existing Elevations
- 1196-P04 Proposed Ground Floor
- 1196-P05 Proposed Elevations

1.0.3 Information is provided in respect of the following:-

- a brief description of the site and surrounding area
- a description of the proposed development
- consideration of relevant planning policy.



Fig. 1 – Aerial image of application site

2.0 THE SITE AND SURROUNDING AREA

- 2.1.1 The application site (Unit 2) comprises an existing standalone retail unit located at Lower High Street, Merthyr Tydfil, close to the main roundabout intersection with High Street, the A4054 and the A4102. The predominant land uses within the immediate area are commercially oriented (offices, ex-servicemen's club, food store, petrol sales, sorting office, etc.).
- 2.1.2 The ground floor of Unit 2 was previously used as a tool hire establishment. Unit 2 is currently vacant.
- 2.1.3 The site is level and vehicular access to Unit 2 is shared with the adjacent petrol station. There are at least 2 no. parking spaces available along the side of Unit 2. The front elevation of Unit 2 is shown in *Figure 2*, whilst *Figures 3, 4, 5* and *6* provide further visual detail.



Fig. 2 – Front elevation of Unit 2



Fig. 3 – Side elevation of Unit 2 – Ex-servicemen's club on left



Fig. 4 – Side elevation of Unit 2 looking towards Lower High Street



Fig. 5 – Side elevation of Unit 2 adjacent to petrol station forecourt



Fig. 6 – Rear elevation of Unit 2 adjacent to Royal Mail sorting office

2.1.4 Unit 2 is of rectangular proportions and design. Its most noticeable feature is the glazed front 'box-like' extension, with first floor above. The other elevations comprise a mix of brick and smooth render, interspersed with fenestration and capped by a flat roof. Visually, the building does not display any noteworthy architectural feature.

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- 2.1.5 To the west of the application site is the Merthyr Borough Ex-Servicemen's Club building, whilst to the east is the 'applegreen' petrol station. A Royal Mail sorting office is situated to the rear, with the Lower High Street roundabout intersection to the front.
- 2.1.6 There are no potential issues or other material considerations arising from the design/layout of Unit 2 nor indeed the overall character of its surroundings that would prevent the proposed change of use taking place.

3.0 PLANNING POLICY

3.1 NATIONAL PLANNING POLICY

- 3.1.1 Planning Policy Wales (PPW) (Edition 11, February 2021) is the latest update that sets out the direction of Welsh Government policy, with its holistic objective to accommodate both current and future societal needs.
- 3.1.2 Regrettably, the document is silent on many day-to-day planning issues and instead focusses upon a number of nebulous paradigms and concepts.
- 3.1.3 The most dramatic change within PPW Edition 11 is the promotion and adherence to the socio-economic context provided by the Well-being of Future Generations (Wales) Act 2015.
- 3.1.4 It is evident that PPW is now aiming to maximise the delivery of outcomes against all aspects of well-being and sustainable development by adopting the new and largely conceptual 'placemaking' approach.
- 3.1.5 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015, and other key legislation.
- 3.1.6 'Sustainable development' is defined as the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.
- 3.1.7 PPW also sets out the manner in which placemaking will influence land use plan making, as well as development management decisions. The plan-led system is considered fundamental in underpinning the delivery of "sustainable places".
- 3.1.8 Despite the weight given to conceptual policy, PPW does contain a number of more pragmatic guiding principles which are relevant to the submitted proposal, namely:-
- Better Places through Design

- Development Efficiency
- Regeneration

3.1.9 PPW emphasises the importance of good design as being fundamental to creating sustainable places where people want to live, work and socialise. It is also considered to promote environmental sustainability by contributing to the securing of “well-being” goals.

3.1.10 There is an emphasis for people to access jobs and services through shorter, more efficient and sustainable journeys. Essentially, this means reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Reducing the need to travel and supporting sustainable transport can be secured by enabling developments which:-

- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
- are designed in a way which integrates them with existing land uses and neighbourhoods; and
- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.

All of the above are satisfied by the submitted proposal.

3.1.11 In addition to PPW, further detail is provided by a series of Technical Advice Notes (TANs) relating to a range of issues and additional procedural advice is given in circulars and policy clarification letters. The most relevant TAN in respect of the proposal is TAN 23: Economic Development (February 2014).

3.1.12 TAN 23 states that local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.

3.1.13 The application site is within the defined urban area of Merthyr Tydfil and therefore, by definition, already encompasses many sustainable development attributes.

3.1.14 The Wales Spatial Plan - People, Places, Futures sets a strategic framework to guide future development and policy interventions. It integrates the spatial aspects of

national strategies for social inclusion and economic development, health, transport and environment, translating the Welsh Government's sustainable development duty into practice.

3.1.15 This brief synopsis of national policy suggests that the proposed change of use to a tanning studio should be welcomed from a job creation perspective and supported from a sustainable development point of view.

3.2 LOCAL PLANNING POLICY

3.2.1 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 located is the Merthyr Tydfil Replacement Local Development Plan (2016-2031)(adopted January 2020).

3.2.2 The LDP provides context for the consideration of the submitted development proposal and contains general development management policies, as well as site specific policies.

3.2.3 The application site is located within the settlement limits of Merthyr Tydfil (*Policy SW4*) and within the Town Centre Boundary (*Policies EcW3 and EcW5*), forming part of the established retail/commercial area.

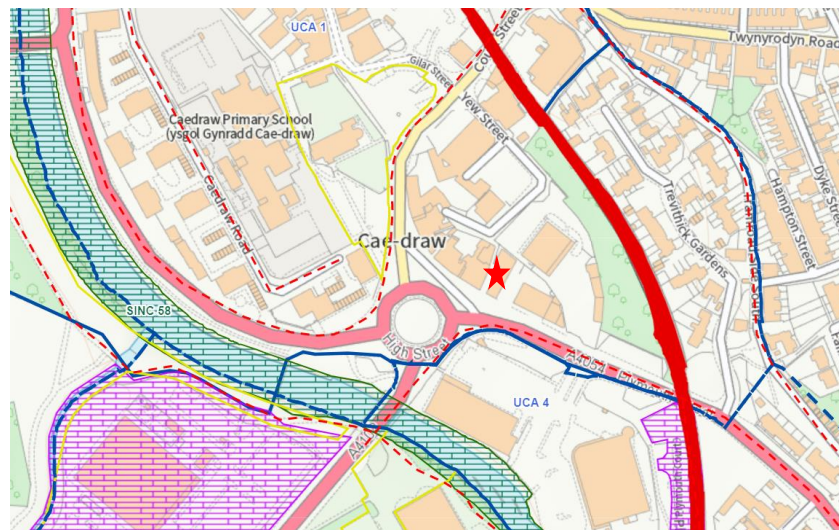


Fig. 7 – Merthyr Tydfil Replacement LDP Proposals Map extract

3.2.4 The site also lies within an Urban Character Area (UCA1) with Conservation and the Built/Historic Environment: Archaeologically Sensitive Area (*Policy CW1*) being relevant. *Policy CW1* aims to “...support positive strategic planning, localised management initiatives, regeneration and conservation schemes”. Of the nine Urban Character Areas identified in the LDP, the site falls within UCA1 - Town Centre: High Street and Pontmorlais,

3.2.5 The relevant policies are reproduced below.

Policy SW4: Settlement Boundaries

To encourage development within urban areas, support the re-use of previously developed land, and to protect and support the functioning of our rural economy and the countryside, settlement boundaries will be defined as follows:

Primary Growth Area:

- Merthyr Tydfil
- Trefechan

.....

Policy CW1: The Historic Environment

The integrity of our historic environment assets will be conserved and enhanced. Development proposals will only be permitted where it can be demonstrated they would preserve or enhance the architectural quality, character or the historic or cultural importance of our designated historic environment assets.

Development affecting undesignated historic environment assets including, Locally Listed Buildings or structures, Landscapes of Outstanding Historic Interest in Wales, Urban Character Areas and Archaeologically Sensitive Areas should have regard to their special character and archaeological importance.

Policy EcW3: Retail Hierarchy - Supporting Retailing Provision

Merthyr Tydfil Town Centre is the favoured location for retail, leisure, and other complementary development, being situated at the head of a retail hierarchy and being followed by the local centres of Dowlais, Gurnos, Cefn Coed and Brecon Road/Morgantown, Troedyrhiw, Aberfan, Treharris and a new local centre forming part of the ‘Hoover Strategic Regeneration Area’. Proposals for new and enhanced retail, leisure and other complementary provision in all these centres will be permitted where they improve the vitality and viability of the centre(s) concerned.

Outside the above centres, proposals will be subject to an assessment of need and a strict application of the sequential test. Proposals will then only be permitted where they avoid causing harm to town/local centre vitality and viability.

Policy EcW5: Town and Local Centre Development

Development enhancing the vitality and viability of the Town and Local Centres will be supported.

Within the Town Centre Primary Shopping Area (PSA) the change of use of the ground floor from A1 to another 'A class' use will be permitted where;

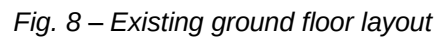
- At least 75% of the commercial uses at street level within the PSA remain A1, and;*
- There are no more than two adjoining 'non-A1' units in any row of five units, provided there are not more than three 'non-A1' units in any 5 units.*

Within the PSA and local centres, the change of use of the ground floor to 'non-A' use classes will only be permitted where:-

- It is demonstrated through active and appropriate marketing that the existing use is no longer economically viable; and,*
- The proposal would not result in an over concentration of non-A1 uses that would be detrimental to the vitality, attractiveness and viability of the local centre; and,*
- The proposal would not result in the creation of a dead window frontage; and,*
- The proposal would not have an unacceptable effect on the amenity and viability of neighbouring uses, having regard to the 'agent of change principle'.*

- 3.2.6 The main purpose of the town centre boundary is to define the area where retail, leisure and other town centre uses should be concentrated, in accordance with the sequential approach and the uses that will be protected under the retail impact test.
- 3.2.7 The LDP adopts PPW's sequential approach in respect of locating retail and other complementary commercial development in the most accessible locations in terms of services, facilities and public transport.
- 3.2.8 The proposed change of use is fully compliant with the foregoing national and local planning policy.

4.0.1 The proposal seeks planning permission for the change of use from retail A1 to a tanning salon. The Applicant specialises in providing tanning salon facilities to a range of customers at several venues throughout South Wales.



Side Elevation

Side Elevation

- Thin d
- Wall
- Floor
- Ceiling
- Windows
- Doors
- Stairs
- Railing
- Balustrade
- Furniture
- Sanitary
- Kitchen
- and other

13



Fig. 11 – Proposed front elevation with company branding

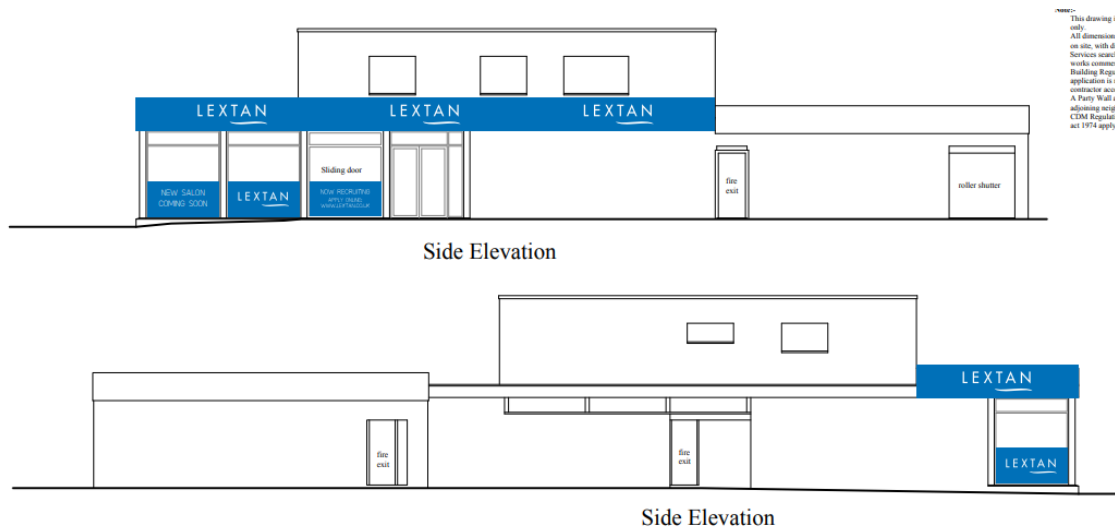


Fig. 12 – Proposed side elevations with company branding

4.0.3 The interior of the unit will be sub-divided into separate tanning booths, each equipped with a sunbed. The internal layout will comprise the following, which will be separated by stud partition walling:-

- reception/waiting area
- max. 12 no. tanning booths
- WC
- staff room
- storage

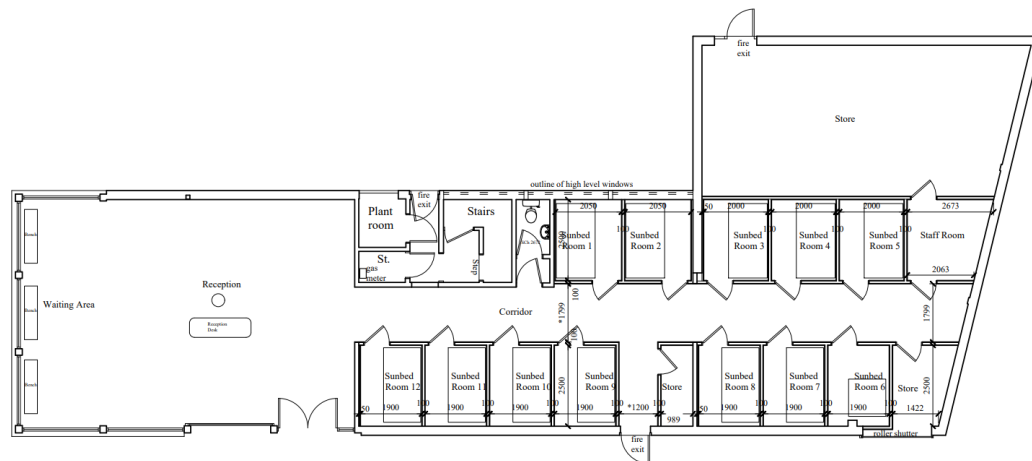


Fig. 13 – Proposed ground floor layout

4.0.4 The proposed development will utilise the existing on-site parking arrangements.

4.0.5 The proposal will result in the creation of 2 no. full time and 4 no. part time jobs and will operate within the following time frames:-

- Monday – Friday 09:00 – 22:00
- Saturday – Sunday 09:00 – 19:00

4.0.6 The nature of the business can best be described as passive – there is no activity that would give rise to noise or late night activity. Customers are looking for a service that is discrete and readily accessible.

4.0.7 It is evident that the proposed change of use will make a positive contribution to the locality's vitality and vibrancy and will facilitate the expansion of a successful business.

5.0 CONCLUSION

- 5.0.1 The proposed development is fully compliant with both national and local planning policy.
- 5.0.2 The proposed change of use will make efficient and positive use of an existing vacant commercial unit and will assist the expansion ambitions of a successful company.
- 5.0.3 It is therefore respectfully requested that planning permission be granted for the submitted scheme.