

Date: 16th January 2025
Our Ref: 24.255

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Dear Sir or Madam,

Town and Country Planning Act 1990

Proposed change of use application for the conversion of the Passivhaus unit from example dwelling only to an office space (B1 Use)

22 Lansbury Road, Gellideg, Merthyr Tydfil, CF48 1HA

Planning Portal reference: PP-13602352

Asbri Planning is appointed as planning agent to Merthyr Valleys Homes to submit a full planning application to Merthyr Tydfil County Borough Council in relation to the above site. It is proposed to change the building's use from an example residential unit to office space.

The planning application has been submitted via Planning Portal and the submission documents are listed below.

The following drawings are submitted, prepared by Paul Overton Architects:

Drawing name	Drawing reference
Site Location Plan	9056-01
Proposals	9056-01

In addition, the supporting documents submitted comprise the following:

Document name (reference where appropriate)	Prepared by
Planning Application Form	Asbri Planning
Planning Letter	Asbri Planning

In addition, the sum of £460 will be paid to Merthyr Tydfil County Borough Council in payment of the planning fee. This is the correct fee for a full planning application for other material change of use of a building or land.

Site Description and Background

The application site is situated adjacent to Merthyr Valleys Homes offices in Gellideg, Merthyr Tydfil. It is centred on the grid coordinates: X: 303227, Y: 207026 and what3words ///eager.bake.living. The site comprises a single modular Passivhaus unit, located to the south east of the main Merthyr Valleys Home office building (detached, two-storey).

The site is relatively flat, with the building situated to the south east of the site and is orientated towards the main Merthyr Valleys Homes office. Grass lawns, hardstanding footpath/parking areas and a border of interspersed trees and bush/shrub are found at the southern portion of the site, alongside a larger hardstanding parking area

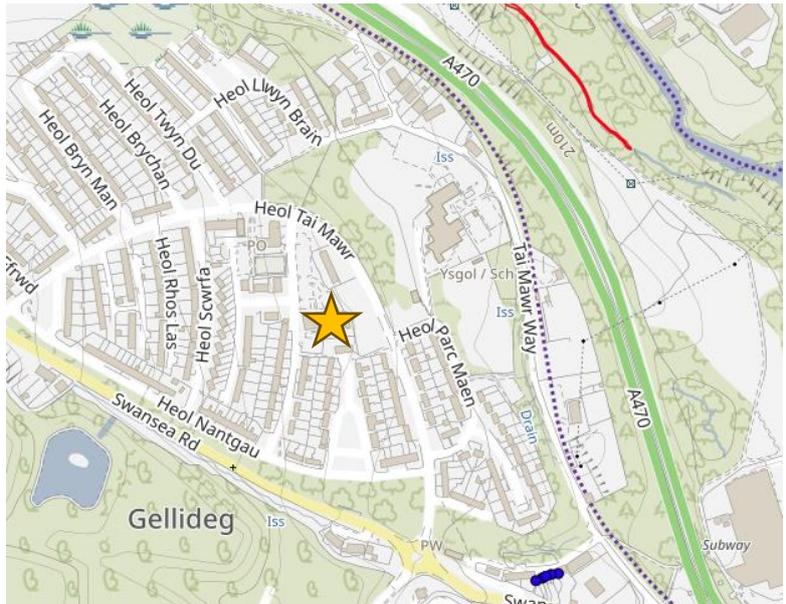
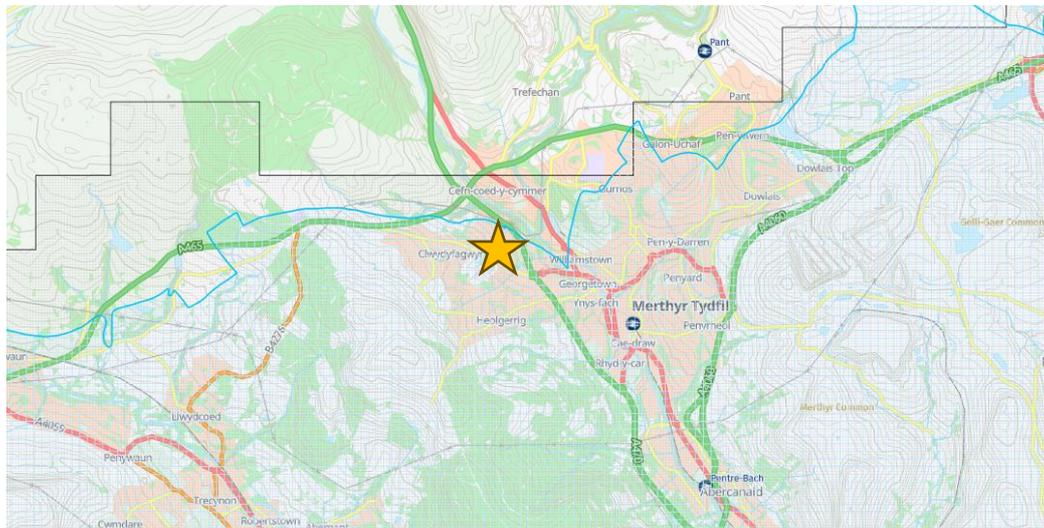


Figure 3 Cadw Mapping

A review of Cadw's online mapping service reveals that the site is not situated within close proximity to any historical assets. However, five Grade II listed buildings are located approximately 420m to the south east. Furthermore, Tai Mawr Leat for Cyfartha Iron Works is located approximately 420m to the north. Due to distance and the nature of the proposed development, the impact of the proposals on the historic environment will not present a constraint.



Surface Coal Resource Area

Coal Mining Reporting Area



Figure 4 Coal Authority

A review of the Coal Authority’s mapping services shows that the site lies within the coal mining reporting area, along with the surface coal resource area. Despite this, it is not considered that a coal mining risk assessment should be implemented to accompany this planning application as a result of the nature of the proposal as a change of use with no physical alterations.

Planning History

Reference	Description	Decision
P/20/0168	Retention of 1 Passivhaus unit (to be used as an example only and not for residential purposes) with associated works	Full Approval

Proposal

It is proposed to change the use of the existing Passivhaus unit from example only to an office space. Specifically, the unit will be used as meeting/welfare space and as a quiet designated space for producing podcasts.

Planning Policy

Future Wales: The National Plan 2040

Future Wales: The National Plan 2040 adopted in February 2021 establishes a national framework setting the direction for development in Wales to 2040. It forms a development plan with 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.

Policy 1 (Where Wales Will Grow) identifies National Growth Areas and states:

The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- Cardiff, Newport and the Valleys
- Swansea Bay and Llanelli
- Wrexham and Deeside

Further to the above, Policy 33 (National Growth Area – Cardiff, Newport and the Valleys) states that the Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys.

Planning Policy Wales Edition 12

Planning Policy Wales Edition 12 (February 2024) is the principal document which sets out the land use policy context of the Welsh Government. Its primary objective is to ensure that the planning system itself contributes towards the delivery of sustainable development whilst improving the social, economic, environmental and cultural well-being of Wales, as required by the Well-being of Future Generations Act 2015 and other pertinent legislation.

The planning system is central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage the use and development of land in the public interest which is consistent with key sustainability principles.

Section 3 – Strategic and Spatial Choices, states that:

Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. The policy issues should not be considered in isolation from one another. Paragraph 3.3 explains that good design is fundamental to creating sustainable places where people want to live, work and socialise. 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.

Paragraphs 3.5 and 3.6 of PPW relate to Access and Inclusivity, stating that:

Good design is inclusive design. Development proposals should place people at the heart of the design process, acknowledge diversity and difference, offer choice where a single design solution cannot accommodate all users, provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for everyone.

Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children. There will often be wider benefits to be gained through the sensitive consideration of such provision, for example, whilst the presence of visual cues will be invaluable in assisting those with hearing loss to engage in a noisy environment, a navigable environment will benefit all. Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport.

Section 5.4 relates to Economic Development; it reads as follows:

For planning purposes, the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses. Moreover, paragraph 5.4.13 relates to the proposed development, stating the following:

- support national, regional, and local economic policies and strategies;
- align jobs and services with housing and sustainable transport infrastructure, to reduce the need for travel, and dependency on travel by car;
- promote the re-use of previously developed, vacant and underused land.

Section 5.4.16 states that economic clustering typically occurs when businesses from the same or similar industry, or with a common interest, choose to locate in close proximity for mutual benefit. This may provide benefits such as shared facilities, infrastructure, local pools of skilled and qualified labour, common supply chains and links to higher education.

Finally, section 5.8 (Sustainable Buildings) demonstrates that the planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.

Technical Advice Notes

TAN 12: Design (2016)

In defining the notion of design, paragraph 2.1 states that it can help in articulating our nation and culture whilst helping in sustaining a positive image of Wales.

Paragraph 2.5 warns that 'good design is not inevitable', in order to achieve it, it must embrace sustainability, architecture, place making, public realm, landscape, and infrastructure. The five objectives of good design are as follows:

- Access;
- Character;
- Community Safety;
- Environmental Sustainability; and
- Movement.

Merthyr Tydfil Local Development Plan (2016-2031)

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the authority's adopted development plan, unless material considerations indicate otherwise. In this instance, the statutory development plan for the application site is provided in the Merthyr Tydfil Local Development Plan (2016-2031), which was adopted in January 2020.

The following LDP Policies are considered to be relevant to the proposed development:

Policy	Relating to
SW4	Settlement Boundaries
SW11	Sustainable Design and Placemaking
EnW4	Environmental Protection
EcW1	Provision of Employment Land

The LDP proposals map reveals that the site lies within the settlement boundary for Merthyr Tydfil. As such, is located within an area where development is generally viewed favourably. The site is not subject to a specific allocation/designation.



Figure 5 Merthyr Tydfil LDP Interactive Proposals Map

Supplementary Planning Guidance

In addition to the aforementioned LDP policies, the following Supplementary Planning Guidance document is also considered relevant to this planning application.

- Guidance Note No. 4 – Sustainable Design (2013)

Planning Considerations

This section identifies the main issues relevant to the consideration of this change of use application and assesses the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- The principle of development in terms of development plan policy and other planning context;
- The impact of the development on the character and appearance of the surrounding area; and
- Impact of the development in terms of sustainable transport and parking.

Principle of Development

The site is located within the settlement boundary for the town of Merthyr Tydfil, in accordance with LDP Policy SW4. Therefore, the general principle of development is established, subject to adherence with other material considerations. It is proposed to change the use of an existing modular Passivhaus unit, without any physical changes made to the unit. It is considered that this is a suitable and beneficial use for the aforementioned unit, as it will provide an importance new facility for Merthyr Valleys Homes without the need for additional building works. As such, the proposals are supported by LDP Policy SW4, which promotes the re-use of previously developed land, Policy SW11, which relates to Sustainable Design and Placemaking and SPG 4 (Sustainable Design).

Character and appearance of surrounding area

The proposed development seeks to change the use of the existing modular Passivhaus unit, without making any physical modifications other than the formal connection to utilities and sewer. As such, the impact of the development on the surrounding character and appearance will not be impacted.

Sustainable transport and parking

As aforementioned, the existing site has a sizable parking area situated to the north (including disabled spaces), with a smaller staff car park to the south. It is unlikely that the proposed development will amount to an increase in staff members. Therefore, it is considered that the existing parking acceptably facilitates the proposed change of use, in accordance with Merthyr County Borough Council's parking standards.

Active transport (by foot) is facilitated by lit footpaths within the immediate vicinity. Furthermore, public transport options are readily available, with the nearest bus stop located approximately 50m east. This provides regular access between Castle Park, Twyncarmel and Merthyr Bus Station via service 23. Merthyr Tydfil Railway Station is located approximately 2.08km to the south east, which provides regular services to Cardiff Central. There are no public rights of way which cross or adjoin the site. However, pedestrian travel is well facilitated by lit footpaths within the immediate vicinity. Moreover, whilst there are no cycle lanes in the vicinity of the site, there are traffic calming measures and 20mph speed limits in place. These measures improve the road safety for cyclists and allow them to mix more comfortably with other vehicles, hence facilitating active travel. It is therefore considered that sustainable transport is supported at this site, in line with The Active Travel (Wales) Act 2013.

Conclusion

This planning letter supports the full planning application for the change of use of an existing modular Passivhaus unit to an office space at 22 Lansbury Road, Gellideg, Merthyr Tydfil. The unit is currently used as an example dwelling, and it is proposed under this application to be utilised as office space, facilitating meetings, wellbeing and podcasting. It is considered that the proposed development offers many benefits without any significant detrimental impacts, and is in accordance with national and local policy.

I trust that the submitted documents allow for the application to be validated and look forward to receiving details of the name of the case officer, application reference number and target determination date in due course. Should you have any queries in the meantime, please do not hesitate to get in touch.

Yours sincerely,

Nancy Heffaran

Nancy Heffaran
Graduate Planner