

Your Ref.: P/24/0265

Our Ref.: 24/0265

To: Town Planning – Development Control

FAO: Kate Glover

From: Engineering and Highways – Highway Development Control

Please ask for: Liam Davies

Date: 20/02/2025

**OBSERVATIONS BY THE ENGINEERING AND HIGHWAYS DIVISION IN RESPECT OF DEVELOPMENT
AFFECTING EXISTING OR PROPOSED PUBLICLY MAINTAINED HIGHWAY**

PROPOSED DEVELOPMENT

The proposed application is for the Change of use from use classes B1,B2,B8 to a Veterinary Practice (Sui Generis use).

LOCATION

Unit 1 Paisley Park Pant Industrial Estate Merthyr Tydfil CF48 2SR

HIGHWAY ASSESSMENT

REVIEWED DOCUMENTS AND PLANS

Document Name	Document/Drawing Number	Date
Technical Note 01	LTP/2425/TN/01/V1	January 2025
Transport Statement	LTP/2427/TS/01	November 2024

This is the highway response to the document submitted by the applicant Link Transport **Planning, Technical Note 01**. The technical note was submitted following the highway authorities response on 18-12-2024 to the original transport statement and documents supporting the planning application 24/0265 which is for the change of use from use classes B1,B2,B8 to a Veterinary Practice whereby the highway authority recommended refusal of the application due to lack of associated parking.

GENERAL OVERVIEW

The highway authority raises concerns with regards to the proposed parking for the site and do not believe the proposed site has adequate parking available for the needs of the proposed development. The trip generation related to the site is not an issue, the issue the highway authority have is that there are only 5no parking spaces associated with the development and given the complexity of the proposed business, there is a high probability it will attract predominantly private vehicle users as opposed to alternative modes of transport and whilst staff can be guided to user alternatives to the private car, it is highly unlikely that the clients will be.

PARKING PROVISION

Within the technical note 01, it states that Merthyr Tydfil County Borough Council (MTCBC) have given no regards to sustainable transport to and from the development. As this is a sui generis site, as previously stated in the initial highway comments there are no parking standards within the Wales Parking Standards 2014 associated with this classification of use. Therefore, the highway authority must review the development on its own specific merits.

In paragraph 2.2.3 of the technical note 01, it refers to sustainable transport policies and legislation, highlighting there should be a clear hierarchy, taking into account walking, cycling and public transport. The highway authority have considered public transport and pedestrian access for the potential employees on the site, but with regard to the clients visiting the site, given the proposed use, the highway authority feel that cycling and walking for those bringing in their pets will be, in all probability, the least favoured mode of transport.

Paragraph 2.2.3 also states the following, ***“Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of Technical Note 01 Paisley Park, Pant Industrial Estate, Merthyr Tydfil, Document reference: LTP/2425/TN/01 | V1 Page 7 reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport.”***

Given that the proposed development will sit within an established industrial estate and only has a small residential area within walking distance (Pant, Census 2011 2,656 residents), it is unlikely that a business could thrive by only expecting local residents to be clients. In all probability, the majority of clients will be from the Merthyr Tydfil area (Census 2011 43,820 residents) who will have to cross the A465 in order to access the development and it is highly unlikely that clients will do this by cycling or walking with their animals.

Paragraph 2.2.5 states ***“However, not every staff member or appointment requires a car to be parked on-site; the submitted TRICS data confirms a more realistic scenario, based on actual site operations rather than a theoretical worst-case scenario, that five parking spaces are sufficient.”***

The applicant has tried to use TRICS data to justify that the 5no parking spaces they have available are all that's required/necessary, however it's unclear how they've come to this conclusion as the documentation submitted does not expressly state how many spaces are used within the TRICS database. In the original transport statement document, 3no sites have been

interrogated, however as one site is located in Scotland, this should be disregarded. In the Technical Note 01, only 2no sites have been put forward, again one being located in Scotland, which means in both cases the parking requirement is being based on one or two sites, which is not acceptable. In interrogating these sites, it would appear that they are much larger veterinary practices with 25+ parking spaces each. It is for this reason that the highway authority have based their parking requirement on the staffing levels, reception area, conference room and other uses of the site. The highway authority have also taken into account the potential increased use in the future. It also needs to be noted the highway authority do not consider end user as end user could change at any time and thereby changing the business model.

Paragraph 2.2.24 states ***“The TS states that the total wider site provision is 37 spaces, and the current application site has five dedicated spaces. Whilst there is no requirement for further parking spaces, as evidenced in the TS TRICS assessment and unequivocally mandated by planning policy on modal shift, it is not uncommon for businesses to share parking spaces and for spaces to be reallocated by the site management company based on dynamic demand as uses and operators change and it is considered appropriate to take this into account when assessing the site.”***

The highway authority will not take into consideration the sharing of dedicated spaces on the site. The statement made within the transport note is also contradicting as based on the statement made in regards to sharing spaces, there would be no reason as to why another business couldn't use the spaces dedicated to the vets if their own business spaces were full, this increasing the shortfall for the development.

TRIP GENERATION

In regards to TRICS, the applicant has changed their stance on TRICS and has only interrogated 2no sites within the Traffic Note, however 1no site is not acceptable as it is located in Scotland and a minimum of 3 sites should be provided. It is also noted that each site had a high number of surgeons but equally a larger degree of parking available. It is also unclear what other facilities were/are available on these sites.

RECOMMENDATION:

The highway authority object to the proposals based on the following reasons:

- 1) Adequate provision cannot be made on the site for the parking of vehicles in a satisfactory manner. The proposed development would be likely to encourage the parking of vehicles on the public highway, which would interrupt the free flow of traffic and thereby add to the hazards of highway users at this point.