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Dear Sir or Madam,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
OUTLINE PLANNING APPLICATION FOR THE DEVELOPMENT OF THE VACANT SITE TO
ACCOMMODATE RESIDENTIAL DEVELOPMENT AND RETAIL SPACE
LAND ADJACENT TO 8&9 PERROTT STREET, TREHARRIS

Asbri Planning has been appointed by TRI W Limited to submit a planning application for the redevelopment of the vacant site to develop a mixed-use development on the land adjacent to 8-9 Perrott Street, Treharris.

The planning application submission comprises the following documentation:

- Planning Application Forms
- Design Statement
- A001 – Site Location Plan
- A002 REVA – Existing Site Layout
- A003 REVA – Proposed Site Plan
- A004 REVC – Proposed Lower Ground
- A005 REVC – Proposed Upper Ground
- A006 REVC – Proposed First Floor
- A007 REVC – Proposed Second Floor
- A008 REVE – Proposed Roof Plan
- A009 REVE – Proposed Elevations
- A010 REVA – CGI

The planning application is submitted in outline, with all matters to be considered save for landscaping. NO Pre-Application consultation stage is required as the scheme is below the 1,000 sqm requirement as set out in the relevant guidelines.

The relevant outline planning application fee is £460.00 based on £460.00 per 0.1ha as the site is 342sqm and this will be paid under separate cover.

Site Description

The site at Perrott Street is broadly rectangular, vacant and sloping from west to east with an area of approximately 0.02ha or 0.069 acres. It is a redundant site characterised by overgrown grasses and scrub. The site is elevated above a public car park to the eastern boundary which in turn overlooks the Taff Bargoed Valley.

The site is located at the southern edge of the established commercial centre of Treharris at the junction of the commercial area and the residential properties to the south and west. Therefore, the site's surroundings comprise

a variety of uses including retail, business, service and residential uses.

Primary access to the site is achieved via Perrott St. In respect of public transport, there is a bus stop positioned immediately opposite the site. Bus Services 7, S79, 78 and X4 operate hourly from this stop which provides users with transport to destinations including Merthyr Tydfil, Cardiff, Pontypridd and Blackwood. Given its accessibility to surrounding services and public transport, the site lies in an inherently sustainable location.

A review of the adopted Merthyr Tydfil County Borough Council Replacement Local Development Plan 2016-2031 reveals that the site falls within the Treharris designated retail town centre boundary and Conservation Area and the site lies within close proximity to a number of historical assets. The nearest of which relates to the Treharris Public Library situated adjacent to the site and north of its junction with John Street. The Library is designated as a Grade II Listed Building (Cadw Ref: 80909).

As mentioned, the site also lies within a Conservation Area. As such, the design of the proposed building has been prepared in order to conserve and reflect the character and appearance of the location.

Planning History

A review of Merthyr Tydfil CBC online planning register reveals that planning permission has previously been granted for both commercial and residential uses, with the most recent planning permission granted under reference P/17/0356 for the erection of a veterinary surgery.

The site has also more recently been the subject of detailed pre-application discussions between the applicant and the LPA. Further context in terms of these discussions and the amendments to the scheme that have been made is provided in the section below.

The Proposed Scheme

The proposed scheme comprises 1 no. retail unit and 6 no. 1 bedroom flats. Parking will be provided to the rear of the site in the existing car park. A new loading bay will also be provided on Perrott Street.

The retail element will be provided on the ground floor level off Perrott Street, with additional floor space on the lower ground floor for storage/back of house services accessed off the car park area, whilst residential flats will occupy the two floors above.

Retail provision within the development has been retained to reflect the site's town centre location with frontage onto Commercial Street. This will ensure that the vitality and vibrancy of the centre is protected.

Following the pre-application discussions undertaken with the LPA, the proposed scheme has now been significantly redesigned to reflect the key issues presented by the conservation area designation, and adjacent listed building.

The revised scheme has been reduced in its massing and now proposes a sympathetic design which preserves the character of the conservation area and respects the listed library. The current vacant site which is an eyesore – and has to be viewed as currently negatively impacting the character of the conservation area – has the capacity for the building of the scale which is now proposed. The heritage input that we have had has resulted in the front gable now sitting slightly higher than the ridge of the main roof, and has also stepped the gable slightly forward of the rest of the front elevation. The proposed building will sit in line / just below the ridge line of the listed building, and the step to the adjoining terraced property is appropriate in terms of the street scene. Further detail in respect of the proposals are contained in the accompanying design Statement.

The accompanying Context Elevations (Ref: A010) and Perspective Views (Ref: A012) illustrates the proposed elevations for the site.

The proposed development will result in a series of economic benefits including the protection of the retail element and associated jobs at ground floor level.

Planning Policy Framework

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.

Future Wales sets out Welsh Government's Transport Strategy which is to:

"reduce the need to travel, particularly by private car, and supports a modal shift to walking, cycling and public transport. This is reflected in Planning Policy Wales and Future Wales, which put placemaking at the heart of the planning system. This modal shift is supported by the sustainable transport hierarchy, which prioritises walking, cycling and public transport."

Policy 6 of the Plan is in relation to a Town Centre First approach and states:

"Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region."

"A sequential approach must be used to inform the identification of the best location for these developments and they should be identified in Strategic and Local Development Plans."

Policy 11 relates to National Connectivity and states:

"The Welsh Government will support and invest in improving national connectivity. Our priorities are to encourage longer-distance trips to be made by public transport, while also making longer journeys possible by electric vehicles. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to support the delivery of the following measures to improve national connectivity:

- *Rail Network – Transform the rail network and improve the quality of rail services for passengers.*
- *Bus Network – Invest in the development of the national bus network, fully integrated with regional and local bus networks, to increase modal share of bus travel and improve access by bus to a wider range of trip destinations.*
- *Strategic Road Network – Invest in road improvements to reduce journey times, deliver a safer and more resilient road network, and improve air and noise quality. Create a network of rapid-charging points to enable longer distance travel by electric vehicles throughout Wales.*
- *National Cycle Network – Revitalise the National Cycle Network to create a network of traffic-free paths connecting cities, towns and countryside across Wales.*

Planning authorities should support developments associated with improvements to national connectivity and, where appropriate, maximise the opportunities that arise from them.

Planning authorities must ensure that, where appropriate, new development contributes towards the improvement and development of the National Cycle Network and key links to and from it."

In addition, Policy 12 (Regional Connectivity) identifies that:

"The Welsh Government will support and invest in improving regional connectivity. In urban areas, to support sustainable growth and regeneration, our priorities are improving and integrating active travel and public transport. In rural areas our priorities are supporting the uptake of ultra-low emission vehicles and diversifying and sustaining local bus services. The Welsh Government will work with Transport for Wales, local authorities, operators and partners to deliver the following measures to improve regional connectivity:

- *Active Travel – Prioritising walking and cycling for all local travel. We will support the implementation of the Active Travel Act to create comprehensive networks of local walking and cycling routes that connect places that people need to get to for everyday purposes.*
- *Bus – Improve the legislative framework for how local bus services are planned and delivered. We will invest in the development of integrated regional and local bus networks to increase modal share of bus travel and improve access by bus to a wider range of trip destinations.*
- *Metros – Develop the South East Metro, South West Metro and North Wales Metro. We will create new integrated transport systems that provide faster, more frequent and joined-up services using trains, buses and light rail.*
- *Ultra-Low Emission Vehicles – Support the roll-out of suitable fuelling infrastructure to facilitate the adoption of ultra-low emission vehicles, particularly in rural areas.*

Planning authorities must plan the growth and regeneration of the National and Regional Growth Areas to maximise opportunities arising from the investment in public transport, including identifying opportunities for higher density, mixed-use and car-free development around metro stations.

Active travel must be an essential and integral component of all new developments, large and small. Planning authorities must integrate site allocations, new development and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement.

Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points."

National Policy

PPW Edition 11 was published in February 2021. It states that the Welsh Government remains one of the few administrations in the world to have a distinctive statutory duty in relation to sustainable development. The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies that they must carry out sustainable development. The Well-being Goals include:

- *A prosperous Wales*
- *A resilient Wales*
- *A healthier Wales*
- *A more equal Wales*
- *A Wales a cohesive communities*
- *A Wales of vibrant culture and thriving Welsh Language*
- *A globally responsible Wales.*

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.

Paragraph 3.3 states *"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. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area."

Paragraph 3.55 relates to previously developed land and states:

"Previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome."

Paragraph 4.1.10 relates to sustainable transport and states:

"The planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating 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.*
-

Furthermore, paragraph 4.1.11 notes:

"Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site"

Paragraph 4.3.2 relates to retail and commercial development and states:

"Retail and commercial centres should be identified in development plans and include established city, town, district, local, village and neighbourhood centres, which provide a range of shopping, commercial and leisure opportunities as well as places of employment, education, civic identity and social interaction. Opportunities to live in these centres, combined with their good public transport links, make them the most sustainable places."

PPW emphasises that the planning system should support economic growth within the context of sustainable development and that economic development should facilitate regeneration and promote social and environmental sustainability.

Para 5.4.2 states *"Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services."*

Para 5.4.4 States *"Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration. Sites identified for employment use in a development plan should be protected from inappropriate development."*

Paragraph 6.1.6 sets out Welsh Government's objectives for the historic environment. One of which is to:

"preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous."

Technical Advice Notes

The following Technical Advice Notes (TANs) adopted by Welsh Government are also considered to be of relevance to this pre-application enquiry:

- TAN 4: Retail and Commercial Development
- TAN 5: Nature Conservation and Planning
- TAN 12: Design
- TAN 18: Transport
- TAN 23: Economic Development
- TAN 24: The Historic Environment

Merthyr Tydfil CBC Local Development Plan

The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises the Merthyr Tydfil CBC LDP which was adopted in January 2020. A review of the Proposals Map reveals that the site is situated within the settlement boundary. As such, is in an area where development is normally permitted. In addition, and as identified above, the site lies within the Treharris Town Centre and a Conservation Area as illustrated on the Proposals Map extract below:

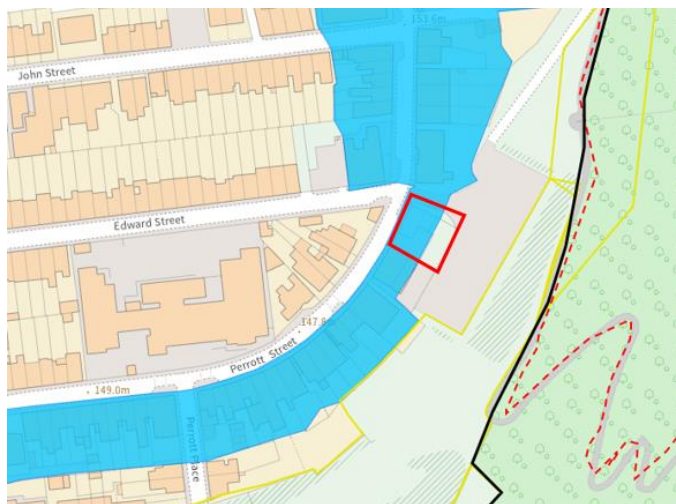


Figure 1: Proposals Map Extract

The following policies are considered relevant to the proposals:

Policy Ref	In relation to
<i>Improving our Social Well-being</i>	
SW1	Provision of new homes
SW2	Provision of Affordable Housing
SW4	Settlement Boundaries
SW11	Sustainable Design and Placemaking
<i>Improving our Cultural Well-being</i>	
CW1	Historic Environment
<i>Improving our Economic Well-being</i>	
EcW5	Town and Local Centre Development

Supplementary Planning Guidance

The following Supplementary Planning Guidance documents endorsed by Merthyr Tydfil Council are considered

relevant to the proposals:

- Guidance Note No.1 – Affordable Housing
- Guidance Note No.3 – Shopfront Design

Material Considerations

The key planning considerations that would arise from the proposed development are as follows:

- The **principle of development** in terms of land use planning policy and sustainable development;
- The **impact of the development on the historic environment**; and
- The **impact of the development on access and traffic generation**.

Principle of Development

The site lies within the settlement boundary. As such, it is in a location where development is normally permitted. It is acknowledged that the site lies within Treharris Town Centre and is therefore protected for appropriate commercial uses by national and local policy. As illustrated by the layout proposal, the retail element accord with LDP Policy EcW5.

Upon completion of the works, it is anticipated that the Co-op will occupy the building. In order to protect the vibrancy and vitality of town centres, it is of paramount importance that national brands such as Co-op continue to operate in these areas which will protect existing employment positions.

In respect of the residential element of the proposal, paragraph 4.3.2 of PPW states that opportunities to live in town centres, *combined with their good public transport links, make them the most sustainable places*. As identified above, the site is immediately accessible to an array of services and facilities. As such, lies in an inherently sustainable location. In addition, the proposed development will also make use of a previously developed site which paragraph 3.55 of PPW confirms should be used in preference to greenfield land in order to achieve sustainable development.

National and local planning policy supports proposals that re-use existing land or buildings for residential uses providing they are situated within the settlement boundary and not protected for existing and alternative uses. As previously mentioned, the proposal will retain its retail provision and ground floor ensuring that this site fulfils its role in protecting the vitality and vibrancy of Treharris Town Centre.

In light of the above, it is considered that the principle of redeveloping the site to accommodate residential and retail development is firmly established.

Historic Environment

It is acknowledged that the site lies within the Treharris Conservation Area and within close proximity to a Grade II Listed Buildings. The proposal has therefore been designed to ensure that the character of the Conservation Area and setting of the listed buildings is protected.

Notwithstanding this, it should be emphasised that the proposed application will secure the beneficial use of the site through the creation of a new retail space and residential flats above. This will ensure that there will be an overall improvement in the character of the Conservation Area.

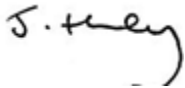
In light of the above, it is considered that the proposed development will conserve the character of the conservation area and setting of the nearby listed buildings in accordance with Policy CW1 of the adopted LDP.

Access and Highways

As set out above, the site lies in an inherently sustainable location with immediate access to an array of services and facilities and public transport provision which will reduce reliance on the private car for residents, staff and customers. Notwithstanding its sustainability, parking provision is proposed to be part of the development, and located to the rear of the unit.

I trust that the submitted documents allow 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. If you have any queries in the meantime, please do not hesitate to get in touch.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J. Hurley', with a stylized flourish at the end.

Jon Hurley
Director

Enc: As Above