

Consultation Details

Consultee: Peter Thomas
Case Officer: Kate Glover
Application No: P/26/0019
Application Type: Listed Building Consent
Site Address: 47 High Street Merthyr Tydfil CF47 8DL
Description of Works: Proposed new entrance, internal alterations, conversion of basement and ground floor to A3 use, and conversion of the first floor to C1 hotel use

Heritage Considerations

☒	Listed Buildings	☐	Scheduled Monuments
☒	Conservation Areas	☐	Historic Parks and Gardens
☐	Historic Landscapes	☐	Other

Recommendation(s)

☒	No objection	☐	Notes for applicant
☐	Object (Holding objection)	☐	Request for further information
☐	Object and recommend refusal	☒	Recommend conditions

Relevant Legislation and Policy Context

This consultation response has been prepared in the context of the duties placed upon the local planning authority by the Town and Country Planning Act 1990 ("TCPA 1990) and the Historic Environment (Wales) Act 2023 ("HEWA 2023).

Section 314A(1) of the TCPA 1990

"In considering whether to grant planning permission for development which affects a listed building or its setting, the Welsh Ministers or a local planning authority in Wales must have special regard to the desirability of preserving—

- (a) the listed building,
- (b) the setting of the building, or
- (c) any features of special architectural or historic interest the building possesses."

Section 160(1) of the HEWA 2023

"In exercising a planning function in relation to a building or other land in a conservation area, a person must have special regard to the desirability of preserving or enhancing the character or appearance of that area."

Note - this is the starting point for assessment of all applications relating to listed buildings and conservation areas.

The above raises two primary questions:

1. Would the development affect the historic asset or its setting (and, if so, in what way and to what extent)? and,
2. Would the identified effect preserve (or enhance) the historic asset, in the context of the statutory duty to have special regard to the desirability of preserving it?

The Barnwell Manor Wind Energy Ltd Court of Appeal judgment in 2014 contains important findings which have direct implications for casework where a listed building or its setting is affected or where it involves a building or other land in a conservation area. It held that despite the slight difference in wording, the nature of the duty in relation to listed buildings and conservation areas is the same and that a decision-maker, having found harm to a heritage asset, must give that harm “considerable importance and weight”.

Your report should expressly acknowledge the need, if harm has been found, to give considerable weight to the presumption that preservation is desirable and demonstrate that this has been done. Otherwise, it would not reflect the duty under s314A TCPA 1990 or s161 HEWA 2023. How that balance will be performed will depend on the factors in the case, but it will always be important to recognise the special status which s314A TCPA 1990 or s161 HEWA 2023 confers upon the relevant relationship with heritage assets and conservation areas.

National Policy

National policy is provided in Planning Policy Wales (PPW) Edition 12, which sets out a presumption in favour of the conservation of the historic environment (Chapter 6). This is supplemented by Technical Advice Note 24: The Historic Environment (TAN 24), which requires that any harm to a listed building must be convincingly justified and that alterations must be the minimum necessary and avoid adverse impact on special interest (paras 5.11–5.15).

Relevant guidance from Cadw, including Conservation Principles and Managing Change to Listed Buildings, has been used to inform this assessment where appropriate.

Assessment

The application relates to the former Barclays Bank at 47 High Street, Merthyr Tydfil, a Grade II listed building situated within the Merthyr Tydfil Town Centre Conservation Area. The building dates primarily from 1901–02 and was constructed for the London and Provincial Bank, later occupied by Barclays until its closure in 2023. It occupies a prominent position on the High Street and forms an important component of the historic commercial townscape.

The special architectural interest of the building derives principally from its well-composed and highly detailed classical street frontage. The ground floor is faced in polished black granite with round-headed openings framed by paired Doric columns, while the upper storey is constructed in Portland stone with Corinthian pilasters and columns, pedimented sash windows and a richly detailed entablature. This façade has strong architectural presence and reflects the characteristic design language of early twentieth-century banking buildings,

conveying permanence and civic status. The building also has historic interest as part of the commercial expansion of Merthyr Tydfil during this period, and communal value through its long-standing use as a bank within the town centre.

Internally, the significance of the building is more variable. The ground floor banking hall has been subject to substantial alteration, including the insertion of suspended ceilings and modern partitions, and retains limited historic fabric. In contrast, the first floor retains elements of its historic plan form and architectural detailing, including moulded doorcases, a surviving panel door and the principal staircase. The basement has strong evidential value, notably through the survival of two safe rooms with reinforced steel doors and earlier masonry fabric that may pre-date the current building.

The proposals seek to convert the building to a mixed-use scheme comprising a restaurant and bar at basement and ground floor level and hotel accommodation at first floor level. External works include the reinstatement of a blocked doorway on the High Street elevation, the removal of a modern external fire escape, and the replacement of non-traditional windows with timber sash windows. Internally, the works involve reconfiguration of the ground floor to accommodate restaurant use, subdivision of the first floor to create hotel bedrooms with ensuite facilities, and adaptation of the basement for ancillary uses, while retaining the existing safe rooms.

In assessing the impact of the proposals, particular regard has been given to those elements that contribute most strongly to the building's significance. The principal elevation to High Street, which is the defining architectural feature of the building, would be preserved. The reinstatement of the blocked left-hand doorway would restore the original symmetrical composition of the façade and reinstate a lost element of its design, thereby enhancing its architectural integrity. The replacement of modern windows and the removal of the external fire escape would improve the appearance of the rear elevation by removing visually intrusive features and reinstating more appropriate detailing.

The internal works would result in some alteration to the historic plan form, particularly at first floor level where existing rooms would be subdivided to create hotel accommodation. However, the significance of the interior is limited in parts due to previous alterations, especially at ground floor level where historic fabric has largely been lost. The works therefore affect the building primarily through subdivision and reconfiguration rather than the loss of important historic fabric.

The justification for the proposals is considered to be robust. The building has been vacant since 2023 and is at risk of deterioration without a viable use. The proposed conversion represents a sustainable and appropriate reuse in a town centre location, consistent with the building's commercial character. The scheme would deliver clear benefits, including securing the long-term use and maintenance of the building, enhancing elements of the exterior through reinstatement and repair, and contributing to the economic vitality of the High Street. Having regard to the statutory duty to give special consideration to the desirability of preserving a listed building and its features of special interest, it is considered that the proposals would preserve the building's architectural and historic significance. The most important elements of significance would be retained and, in some respects, enhanced, while

the degree of change to the interior is proportionate and focused on areas of lesser significance. The proposals therefore represent a justified and acceptable form of development.

Accordingly, the application is supported, subject to conditions to secure appropriate detailing and the protection of historic fabric. Suggested conditions include the submission of detailed joinery drawings for windows and doors, material samples, a method statement for the removal of the fire escape and measures to ensure the retention and protection of historic internal features.

Conditions

1. No works to external doors or windows shall commence until detailed drawings at a minimum scale of 1:20 (with sections at 1:5) have been submitted to, and approved in writing by, the Planning Authority. These shall include:
 - Profiles, mouldings, glazing bars and cills
 - Method of opening
 - Finish and colour

All works shall thereafter be carried out in accordance with the approved details.

2. Prior to installation, samples and/or specifications of all external materials shall be submitted to, and approved in writing by, the Planning Authority. Works shall be carried out in accordance with the approved details.
3. Detailed joinery drawings of the reinstated High Street doorway (including door, frame, ironmongery and finish) shall be submitted to, and approved in writing by, the Planning Authority prior to installation. The door shall match the design, proportions and detailing of the surviving historic entrance.
4. No removal of the external fire escape shall take place until a method statement has been submitted to and approved in writing. The statement shall include:
 - Measures to protect adjacent historic fabric
 - Making good of affected masonry

Works shall be undertaken in accordance with the approved method.

5. The basement safe rooms and doors shall be retained and protected during the works. No removal or alteration shall take place unless otherwise agreed in writing.
6. Prior to the commencement of works, a detailed schedule of internal works shall be submitted and approved, identifying:
 - Areas of demolition ;
 - New partitions, including method of fixing; and
 - Retained historic elements.

Works shall be carried out in accordance with the approved schedule.

7. Prior to commencement of works, a Level 2 historic building record (in accordance with Historic England guidance) shall be undertaken and submitted to the Local Planning Authority. This shall include photographic and drawn records of:
 - Basement safe rooms
 - First floor plan form and joinery
 - Any affected historic fabric
8. All replacement windows shall be timber sash windows to match historic examples in:
 - Opening pattern;
 - Glazing bar profile; and
 - Recess and reveal depth.

No UPVC or aluminium windows shall be installed.

9. No new external plant, flues, vents, ducts, or fixings shall be installed unless details have first been submitted to, and approved in writing, by the Planning Authority.
10. All areas affected by demolition or alteration shall be made good using materials and techniques to match the existing historic fabric.