

INTERNAL MEMORANDUM

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: 16/12/2024

**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

PLANNING HISTORY

24/0087 – Change of use from use classes B1,B2,B8 to a Veterinary Practice (Sui Generis use). | Unit 1 Paisley Park Pant Industrial Estate Merthyr Tydfil CF48 2SR - **refused**

HIGHWAY ASSESSMENT

REVIEWED DOCUMENTS AND PLANS

Document Name	Document/Drawing Number	Date
Proposed Site Plan	201	February 2024
Transport Statement	///	November 2024

Existing and Proposed Use of Site

The existing building is currently unoccupied but has a B1, B2, B8 classification and was constructed with associated 5no parking spaces including a disabled bay. The site lies within an Industrial Estate where each of the units has allocated parking facilities.

The proposed application is for a change of use from an existing use classes B1, B2, B8 unit (329m²), to a veterinary practice (Sui Generis use). As per the submitted document **Transport Statement** (Link Transport Planning Nov 24) which it states that the proposed development will have the following uses:

Ground floor:

- *Customer seating area*
- *Customer toilets*
- *Reception area*
- *Four consulting rooms*
- *Two operating theatres,*
- *Kennels, cattery, x-ray room*
- *Laboratory*
- *Dental area*
- *Dispensary*
- *Janitor room/cupboard*
- *Morgue and isolation area*

First floor:

- *Ancillary uses to compliment the main operations at ground level and enhance the quality of service and care*
- *Two offices*
- *A call centre*
- *A meeting room*
- *Staff room*
- *Storage areas*
- *Staff kennels*
- *Pharmacy store*
- *Staff toilets*
- *Staff shower*
- *Janitor room/cupboard*
- *IT room*

Existing/Proposed Access Arrangement

The existing vehicular access into the Industrial Estate is from an unnamed road, which is adopted highway and restricted to 20mph. There is an appropriate level of visibility in either direction when exiting the industrial estate and the access width is to a suitable standard. Unit 1 is accessed from an internal access road which serves all the units within the estate and the car parking associated with the unit is located to the front of the unit. This existing access arrangement is acceptable in highway terms.

Parking Provision

As this is a sui generis site, there are no specific standards set out in the Welsh Parking Standards 2014 that relate to the proposed use of the building. Therefore, the highway authority will consider the proposed parking on its own merit taking into account the scale and the location of the development

As per the submitted document **Proposed Site Plan 201**, it shows that there are 5no parking spaces (including 1no disabled bay) associated with the proposed development.

As per the submitted document **Transport Statement** it states *“The applicant has advised that there are anticipated to be 1-2 full-time equivalent veterinary surgeons at the site with 4 to 5 support staff on any one day. Typical shift patterns are 4 x 10hour days”* and *“Visitors are predominantly by appointment only, although there are likely to be less frequent unplanned emergency visits”*.

Based on the above the highway authority must take into consideration that even though many visitors attend the building based on appointment only, there will be an overlap of appointments due to visitors arriving early and waiting. Therefore, if there are 2no veterinary surgeons working, then there would be 2no visitors assigned to each veterinary surgeon as a minimum (one attending the appointment and one waiting to be seen).

This would mean for 2no surgeons there would be 6no people on site, 2no employees and 4no attending appointments.

With regard to supporting staff, the document does not state what role such staff will be undertaking but such practices often have veterinary nurses who again would require consulting rooms and have clients. Of the five supporting staff, it would be pragmatic to say 2no are nurses (this would equate to all consulting rooms being used as worst-case scenario). 2no nurses would equate to 6no people on site, those in appointment and those waiting as per the surgeons.

Therefore, for the 4no consulting rooms there would be 12no people on site associated with this element, 4no staff and 8no clients.

Then we must consider the 3no ancillary staff, bringing the total number of people on site up to 15 by just considering the consultation rooms. A shortfall of 10 spaces.

However, highways must now also consider the other elements to be undertaken on the site which will bring in additional visitors and who will not necessarily require an appointment, such as the pharmacy, people making appointments, people picking up their dog or cat (either before or after surgery), Visitors attending meetings (large meeting room). All of these elements will mean that additional parking will be required and the shortfall of parking will therefore far exceed 10 spaces.

This hasn't even taken into consideration the operating theatres that could be outsourced to other vets in the area, and thereby increasing visitor numbers.

There will also be a number of deliveries per day although none is specified within the submitted documentation and there has been no delivery management plan submitted within the application. Therefore, it is not clear how deliveries would be managed or indeed how many deliveries will occur on average per day. However, it should be noted that the deliveries to the site will contribute to the parking shortfall. It is also of concern that without parking for delivery vehicles drivers may park inappropriately within the estate and thereby negatively influencing other unit users

Within the submitted document **Transport Statement**, it states *"Parking provision is proposed to remain as per the existing situation, with a five car parking spaces and three cycle stands (for up to six bicycles) to be retained within a wider provision of 37 car parking spaces (plus additional cycle parking) which are contained within the red line boundary of the 'Land at Pant Industrial Estate' planning consent"*. The submitted plans only show a red line boundary around the application building and the 5no parking spaces associated with the site and not the industrial estate as a whole. The additional 37 parking spaces that have been referenced in the **Transport Statement** maybe within the industrial estate but they will have been allocated to separate units and not unit 1. Therefore, such parking cannot be taken into consideration when looking at available parking to the application site.

Within the documentation, the applicant has tried to justify the lack of parking by siting the extant use and what the building could be used for. However, the highway authority do not feel that any of the businesses mentioned would require the level of parking that this proposal does. With a shortfall of parking at the outset, there is no scope for expansion of the business and given the nature of the business and its location, visitors are less likely to arrive using alternative modes of transport. Only staff could be encouraged to use public transport, cycle or walk.

In conclusion the highway authority consider that the scheme as put forward does not provide the level of parking required for a business of this scale and certainly does not consider any future expansion of staffing levels. With the shortfall of parking within the site being so high and with there being no parking restrictions along the adopted highway, in all probability overspill parking will occur both within the site to the detriment of other site users and out onto the local adopted highway. Given the nature of the adjacent businesses whereby many use articulated lorries and other large vehicles accessing their sites, the highway authority believe that any additional vehicles parking on the adopted highway will have a detrimental impact on the existing highway network such that it will cause a highway safety concern.

Therefore, the highway authority recommend refusal of the planning application based on the lack of parking associated with the proposed development.

Trip Generation

The methodology set out in the submitted document **Transport Statement** is acceptable and the highway authority have no concerns with the effect on the local adopted highway.

Cycle Parking

As per the submitted plan, **Proposed Site Plan 201** it states that the existing cycle parking arrangement of six cycle spaces is to be retained, which is acceptable.

Active Travel / Sustainability

There is a good footway link to the indicative front entrance of the building, the footways within the surrounding area are approximately 2.2m, these existing conditions and are deemed acceptable.

Pedestrians can access the proposed development via the local public transport network. There are 2 no bus stops located at the main road that runs through Pant Industrial Estate, approximately 250m from the proposed development.

Accident Data

Accident Data has been interrogated and it concludes that there has been no accidents recorded along the unnamed road adjacent to the proposed application site in the last five years. Indeed, there appears to be no local cluster areas within the search area.

SAB

All proposals for surface water drainage must meet adhere to Welsh Governments “Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems”. Approval of surface water drainage proposals must be sought from MTCBC SAB prior to commencement on site. The applicant is advised to see advice as soon as possible

RECOMMENDATION

Highway objection is raised for the following reason(s):

- 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.
- Adequate provision cannot be made on the site for the parking of vehicles in a satisfactory manner

NOTES

None.



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Head of Engineering and Highways