

INTERNAL MEMORANDUM

To: Gareth Davies - Development Control Case Officer

Reference: P/26/0197

From: Planning Policy and Implementation Section

Ask for: David James

Extension: 7053

Date: 28th September 2026

Summary

No objection raised. The proposal meets the relevant Replacement LDP policies (SW1, SW3 & SW4).

However, there is a potential concern, given that the site is covered by a TPO. As such, the views of the Council's Ecologist should be sought as a priority (Policy EnW1).

If minded to approve in principle, particular consideration should also be given to the impact of the proposal on the character of the area, how it integrates with adjacent spaces, its impact on the local amenity of the surrounding area and occupiers in terms of loss of privacy, loss of light, overlooking, noise and disturbance, traffic generation and parking provision, the impact on heritage and biodiversity interests, the impact on the proposal on the County Borough's green infrastructure network, its impact on flooding, and any other relevant risks to public health and safety (Policies SW11, SW12, CW1, EnW1, EnW2, EnW3 & EnW4).

The requirements of Policy SW9 should also be noted.

Observations in respect of the above proposal

1. Proposed Development

An application for the construction of four detached houses and new access road, at the rear of Six Bells, Heolgerrig, Merthyr Tydfil.

2. Development Plan Framework

The existing development plan framework in Merthyr Tydfil is provided by:-

The Merthyr Tydfil County Borough Council Replacement Local Development Plan (2016 - 2031)

The relevant LDP Objectives are:-

- *LDP Objective 1 Sustainable Population Growth: To encourage a sustainable level and distribution of population growth.*
- *LDP Objective 2 Welsh Language and Culture: To protect and enhance Welsh language and culture.*
- *LDP Objective 4 Regeneration: To promote the suitable reuse of previously developed land and the continued regeneration of local communities.*
- *LDP Objective 6 Sustainable Design: To promote high quality, sustainable and inclusive design and support measures which mitigate the predicted effects of climate change.*
- *LDP Objective 7 Transport: To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links.*
- *LDP Objective 9 Heritage and Cultural Assets: To protect, enhance and promote all heritage, historic and cultural assets.*
- *LDP Objective 10 Biodiversity: To improve ecosystem resilience and connectivity which support habitats and species of principle importance.*
- *LDP Objective 15 Leisure, Recreation and Tourism: To support sustainable tourism, leisure and recreation developments and encourage an all year round tourism industry.*

The following development plan policies would apply:-

- *Policy SW1: Provision of New Homes*
- *Policy SW2: Provision of Affordable Housing*
- *Policy SW3: Sustainably Distributing New Homes*
- *Policy SW4: Settlement Boundaries*
- *Policy SW9: Planning Obligations*
- *Policy SW11: Sustainable Design and Placemaking*
- *Policy SW12: Improving the Transport Network*
- *Policy CW1: Historic Environment*
- *Policy EnW1: Nature Conservation & Ecosystem Resilience*
- *Policy EnW2: Internationally and Nationally Protected Sites and Species*
- *Policy EnW3: Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species*
- *Policy EnW4: Environmental Protection*

The following supplementary planning guidance is applicable:-

- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 1: Affordable Housing (March 2012)*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 2: Planning Obligations (March 2012)*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 4: Sustainable Design (July 2013)*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 5: Nature and Development (May 2015)*

National Planning Policy

Planning Policy Wales (Edition 12, February 2024)

Planning Policy Wales provide guidance on matters relevant to this application, namely:

- Placemaking in Action: Good Design Making Better Places
- Strategic Placemaking: Previously Developed Land
- Active and Social Places: Living in a Place
- Distinctive and Natural Places: Recognising the Special Characteristics of Places
- Distinctive and Natural Places: Recognising the Environmental Qualities of Places

Future Wales: The National Plan 2040 (February 2021)

Future Wales provides guidance on matters relevant to this application, including, but not limited to:

- Policy 1: Where Wales will grow
- Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
- Policy 8: Flooding
- Policy 33: National Growth Area – Cardiff, Newport and the Valleys

3. Policy Considerations

The site of the proposal is located within the Primary Growth Area (Policies SW1 and SW3), as defined by the LDP, and within the settlement boundary where development will be allowed subject to the proposals compatibility with other plan policies and material considerations (Policy SW4).

Policy SW1 states that 2250 additional homes are required to sustainably grow our population. The proposal comprises 4 new units, which would represent a contribution to the 2250 units that are required during the plan period. Furthermore, Policy SW3 states that new homes will be concentrated within the main settlement of Merthyr Tydfil.

Policy SW9 relates to planning obligations. Where appropriate and having regard to development viability, planning obligations will be sought for:

1. On site provision of affordable housing on sites of 10 homes or more at a level of:
 - 10% in the Primary Growth Area.
 - 5% in the Other Growth Area.
2. A financial contribution towards the provision of affordable housing:
 - On sites of between 5 and 9 homes or;
 - On sites of 10 or more homes, where on-site provision is not appropriate.
3. The provision of open space on sites of 10 homes or more, where there is an identified need.
4. Other relevant obligations not included within the Council's Community Infrastructure Levy (CIL) Regulation 123 List of Infrastructure.

Given that the proposal is for 4 new dwellings, on-site provision of affordable housing or open space, or a financial contribution towards affordable housing, would not be sought. However, Community Infrastructure Levy (CIL) is chargeable on residential development in this part of the County Borough (at £25 per sq m index linked).

Policy SW11 requires new development to, among other things:

- be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density;
- integrate effectively with adjacent spaces, the public realm and historic environment to enhance the general street scene and create good quality townscape;
- not result in an unacceptable impact on local amenity, loss of light or privacy, or visual impact, and incorporate a good standard of landscape design;
- contribute to the provision of green infrastructure, including open space in accordance with the Council's standards, sustainable drainage systems where appropriate, and ensure that the County Borough's network of green infrastructure is accessible and connected;
- allow access for the widest range of people possible, and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards.

The site of the proposal is an undeveloped, wooded piece of land, bound on three sides by existing dwellings and to the north by a large commercial use. It would be accessed via a private drive, which would be located in what is currently the garden of an existing dwelling. As such, the impact on the proposal on the County Borough's green infrastructure network should be considered as a priority, and the Council's Ecologist consulted.

Considering the location of the site, and the existing adjoining dwellings and streets, the layout and form of the development should be carefully considered, as well as how it integrates with the adjacent spaces. Similarly, the impact of the proposal on local amenity, including loss of light, privacy, as well as its visual impact, should be particularly considered.

The impact of the additional traffic generated by the proposal on highway safety and local amenity is also an important consideration. The submitted plans indicate that the dwelling would have off-street parking provision. As such, the proposed parking provision should be checked against the Council's current parking standards. The views of the Engineering and Traffic Group Leader, and the Public Health Manager, should be sought in these respects.

Policy SW12 supports development that encourages a modal shift towards sustainable transport, including the enhancement of pedestrian, cycle, rail and bus facilities, in addition to any necessary road improvements. Development proposals will be expected to demonstrate how they reduce the need to travel and encourage the use of sustainable transport. As such, the views of the Engineering and Traffic Group Leader should be sought in this respect.

Policy CW1 advises that the integrity of our historic environment assets will be conserved and enhanced. Development proposals will only be permitted where it can be demonstrated they

would preserve or enhance the architectural quality, character or the historic or cultural importance of our designated historic environment assets. And that, development affecting undesignated historic environment assets including, Locally Listed Buildings or structures, Landscapes of Outstanding Historic Interest in Wales, Urban Character Areas (UCA) and Archaeologically Sensitive Areas should have regard to their special character and archaeological importance.

The site is located within Urban Character Area 9 - West Merthyr, including Heolgerrig and Gellideg, and within a Landscape of Outstanding Historic Interest. As such, these historic environment assets should be taken into consideration, and the views of the relevant Officer and/or external Heritage body sought in this regard.

Policy EnW1 seeks to protect nature conservation and ecosystem resilience. Policy EnW2 seeks to protect Internationally and Nationally Protected Sites and Species. Policy EnW3 states that development proposals likely to have an adverse impact on Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves, or Priority Habitats and Species will only be permitted where it can be demonstrated that:

1. The need for the development clearly outweighs the conservation value of the site;
2. Adverse impacts on nature conservation features or geological features can be avoided;
3. Appropriate and proportionate mitigation and compensation measures can be provided; and
4. The development maintains and where possible enhances biodiversity and geodiversity interests.

The application site is an undeveloped and wooded piece of land, which is covered by a Tree Preservation Order (TPO 14). As such, the views of the Council's Ecologist and Tree Officer should be sought as a priority.

Policy EnW4 advises that development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:

- Pollution of land, surface water, ground water and the air;
- Land contamination;
- Hazardous substances;
- Land stability;
- Noise, vibration, dust, odour nuisance and light pollution; or
- Any other identified risk to public health and safety.

Where impacts are identified the Council will require applicants to demonstrate that appropriate measures have been incorporated to reduce, or minimise the impact identified to the lowest possible acceptable level. Planning conditions may be imposed or legal obligation entered into, to secure any necessary mitigation and monitoring processes.

As such, the views of the Engineering and Traffic Group Leader and Environmental Health department should be sought in this respect. The Coal Authority should also be consulted, due to potential land instability resulting from historic mining in this area.

With regard to flood risk, new developments will be expected to avoid unnecessary flood risk and meet the requirements of TAN 15. It is noted that small parts of the site are located within Flood Zones 2 and 3 and, as such, an FCA should be submitted and NRW consulted as appropriate.