

INTERNAL MEMORANDUM

To: Gareth Davies - Development Control Case Officer

Reference: P/26/0067

From: Planning Policy and Implementation Section

Ask for: David James

Extension: 7053

Date: 23rd April 2026

Summary

No objection. The development complies with policies SW4 and SW13.

If minded to approve in principle, particular consideration should be given to the impact of the development on the character of the area, the impact on surrounding occupiers, including noise and disturbance, traffic generation and parking provision, the impact on relevant heritage assets, the impact on biodiversity, and any other relevant risks to public health and safety, including flooding (Policies SW11, SW12, CW1, EnW1, EnW2, EnW3 & EnW4).

Observations in respect of the above proposal

1. Proposed Development

An application for the refurbishment and change of use of caretakers accommodation to multipurpose rooms for school and community use and external landscaping works, at Dowlais Primary School – Junior Department, High Street, Caeharris, Dowlais.

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 8 Community Facilities: To support existing community facilities and suitable community led development.*
- *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.*

The following development plan policies would apply:-

- *Policy SW4: Settlement Boundaries*
- *Policy SW9: Planning Obligations*
- *Policy SW11: Sustainable Design and Placemaking*
- *Policy SW12: Improving the Transport Network*
- *Policy SW13: Protecting and Improving Local Community Facilities*
- *Policy CW1: Historic Environment*
- *Policy EnW1 Nature Conservation and 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*
- *Policy EcW9: District Heating Area*

The following supplementary planning guidance is applicable:-

- *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
- Activities in a Place: Community Facilities
- Recognising the Special Characteristics of 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 part of a Primary school, and is located within the Primary Growth Area and settlement boundary where new development can be considered acceptable in principle (LDP Policy SW4) subject to proposals being compatible with the Plan's other policies and all other material considerations.

Policy SW9 considers the requirement for planning obligations. Due to the nature of the development, Community Infrastructure Levy (CIL) and Planning Obligations would not be chargeable.

Policy SW11 advises that development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. Where appropriate, new development will be required to (amongst 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.

Considering the nature of the development and the location of the site (in close proximity to existing residential, commercial and public uses) consideration should be given to the above issues.

The impact of the increased intensity use of the school site, and the subsequent increased traffic movements, on highway safety and the amenity of surrounding residents and occupiers should be particularly considered. Any dedicated parking should be checked against the Council's current parking standards.

The views of the Public Health Manager and the Engineering and Traffic Group Leader should be sought in respect of the above.

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. Developments 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 SW13 supports the provision of new and enhanced community facilities, subject to satisfying other relevant LDP policies. The Council will protect and support the enhancement of the County Borough's existing community facilities.

The proposal would introduce an additional facility to Dowlais Primary School, for use by the community outside of school hours and outside of term time. As such, the school would retain the use of the bungalow during school hours. This would enhance the existing facilities at the school, and would therefore comply with Policy SW13.

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 a Landscape of Outstanding Historic Interest. As such, this and any other relevant 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. The impact of the increased lighting levels on relevant species should be considered, and the views of the Council's Ecologist should be sought.

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. Policy Enw4 seeks to protect against negative environmental impacts and, as such, the Environmental Health department should be consulted.

The application site lies partly within Flood Zone 2, as shown on NRW's Flood Map for Planning.

Para. 10.19 of TAN 15 states that planning applications in Zone 2 require careful consideration and must be consistent with the acceptability considerations set out in section 11 (of TAN 15). They must also be accompanied by a FCA which clearly describes the flood risk and the risks must be acceptable.

As such, Natural Resources Wales should be consulted.