

INTERNAL MEMORANDUM

To: Gareth Davies - Development Control Case Officer

Reference: P/25/0298

From: Planning Policy and Implementation Section

Ask for: David James

Extension: 7053

Date: 5th December 2025

Summary

Concerns raised. The proposal could be considered contrary to Policy SW11 – Sustainable Design and Placemaking, due to the following:

- It would not be appropriate to the local context in terms of its layout and form, given the location and siting of the proposed flats, and their relationship with the existing adjacent dwellings (criterion 1, Policy SW11: Sustainable Design and Placemaking).
- It would not integrate effectively with adjacent spaces and the public realm, nor would it enhance the general street scene and create good quality townscape, resulting in a potentially unacceptable visual impact, given the location and siting of the proposed dwellings, and their relationship with the existing adjacent dwellings (criterion 2 & 3, Policy SW11: Sustainable Design and Placemaking).
- The proposed flats would be sited immediately adjacent, or in close proximity, to the side and rear boundaries of existing and proposed dwellings on three sides. They would potentially be subject to an unacceptable impact on their amenity, in terms of a significant degree of overlooking and loss of privacy, as well as overbearing impact, from the existing dwellings. Similarly, the existing dwellings would potentially suffer the same effect from those proposed (criterion 3, Policy SW11: Sustainable Design and Placemaking).

Notwithstanding the above, the development is in accordance with LDP policies (SW1, SW3, & SW4). If minded to approve in principle, particular consideration should be given to the impact of the development on the character of the area, and the impact on surrounding area and occupiers in terms of noise and disturbance (Policies SW11, SW12 & EnW4), as well as the issues raised in the previous paragraph. Additionally, the impact on historic environment assets, in the vicinity of the site, should be considered (Policy CW1), as well as on nature conservation and ecosystem resilience (Policy EnW1).

The requirements of Policy SW9 should also be noted, as CIL is chargeable in this part of the County Borough (at £25 per sq m index-linked).

Observations in respect of the above proposal

1. Proposed Development

An application to convert a builders yard office to 2 no. flats, at Former Builders Yard, Elwyn Drive, Twynyrodyn, 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 3 Housing Provision: To ensure the sufficient provision of land for the delivery of a range and choice of housing and affordable housing to address local housing needs.*
- *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.*

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 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 two new flats, 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. Given that the proposal is for two flats, 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.

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.

Considering the location of the application site, in close proximity to existing dwellings and within a cul-de-sac, careful consideration should be given to these issues.

The application site is located in a primarily residential area. It is bound by existing dwellings to the front, back and east side. It could potentially be bound by dwellings to the west, if the planning application on the adjacent site (P/25/0281) were to be granted permission.

Considering the location and siting of the proposed flats (and their relationship with the existing adjacent dwellings), they may be appropriate to the local context in terms of their layout and form (criterion 1, above).

Similarly, they may not integrate effectively with adjacent spaces and the public realm, nor would they enhance the general street scene and create good quality townscape (criterion 2).

The proposed flats would be sited immediately adjacent, or in close proximity, to the side and rear boundaries of the existing dwellings. As such, would potentially be subject to an unacceptable impact on their amenity, in terms of a significant degree of overlooking and loss of privacy, as well as overbearing impact, from the existing dwellings. Similarly, the existing dwellings would potentially suffer the same effect from those proposed (criterion 3).

The above should be considered as a priority, however, the impacts of the previous use of the site, should also be taken into consideration.

Any proposed parking provision should be checked against the Council's current parking standards, and the views of the Engineering and Traffic Group Leader should be sought in this respect.

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 3 - Twynyrodyn, including Ysgubor Newydd and Penyrheol, and within a Landscape of Outstanding Historic Interest. As such, these, and any other relevant historic environment asset, should be taken into consideration, and the views of the relevant Officer and/or external Heritage organization sought in this regard.

Policy EnW1 seeks to protect nature conservation and ecosystem resilience. 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.

As such, 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. With regard to flood risk, new developments will be expected to avoid unnecessary flood risk and meet the

requirements of TAN 15. As such, the views of the Engineering and Traffic Group Leader and Public Health Dept. should be sought in this respect.