

INTERNAL MEMORANDUM

Your Ref.: P/25/0269

Our Ref.: 25/0269 REV A

To: Town Planning – Development Control

FAO: Kate Glover

From: Engineering and Highways – Highway Development Control

Please ask for: Liam Davies

Date: 24/10/2025

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 dwelling to a 8 bedroom House in Multiple Occupation all with en-suites

LOCATION

6, Cardiff Road, Troedrhiw, Merthyr Tydfil, CF48 4LB

PLANNING HISTORY

P/24/0261 - Change of use to a 11 bed House in Multiple Occupation – **Refused (highway objection included)**

P/08/0058 - Conversion of dwelling into 2 No. self contained flats – **Withdrawn**

HIGHWAY ASSESSMENT

REVIEWED DOCUMENTS AND PLANS

Document Name	Document/Drawing Number	Date
Transport Statement	2513-RPT-001	September 2025

Proposed Access Arrangement including Visibility

There is no existing or proposed access to the site; however, the site has its frontage along Cardiff road which is adopted highway and subject to 20mph.

Parking Provision

From the submitted plans, it shows that there is an existing 5 bedroom dwelling that has no existing off-street parking associated. As per the Wales parking Standards 2014 it states that "*1 space per bedroom (maximum 3 spaces)*" should be provided. Therefore, there is an existing under-provision of 3no spaces for the site.

Merthyr highway officers use the Welsh Parking Standards to determine whether the proposed parking provision for any planning application is suitable for proposed use. These standards are now over 10 years old and do not align with current planning classifications, which now includes an HMO classification.

[Class C4 — 2 to 6 unrelated people living independently in shared accommodation](#)

However, a large HMO (more than 6) does not fall in any use class and should be deemed to be 'sui generis' and thereby falls into a use on its own and will need to be considered on its own merit.

With this in mind highway officers are concerned that with 8no unrelated individuals, the car ownership would in all probability be much higher than that of the extant use. In fact, if each tenant owned a car then there is the potential of 8no vehicles associated with tenants all requiring a parking space in the local vicinity on the adopted highway. Although within the **transport statement** it states there are good public transport links in the area, it must be remembered that car use and car ownership are two very different things, and whilst tenants may use public transport for day-to-day commuter journeys, they may still require a car for longer journeys at weekends and other times. Within the submitted **transport statement**, it shows a number of photographs of Cardiff Road, however, these are taken from google and only given a snap shot of the area and there is no evidence to support that there is adequate on street parking available

This means that, as there is no off road parking the proposed use on the site will the existing under-provision of 3no spaces will increase by at least 5no spaces. This does not include visitor parking which should be at least 1no spaces. Therefore, the shortfall of spaces is increased to 6.

Active Travel / Sustainability

Pedestrians are able to access the proposed development via Cardiff Road, which has footways on either side of the carriageway with a local controlled crossing facility approximately 80m north of the site along Cardiff Road.

Pedestrians are able to access the proposed development via the local public transport network as there are 2no bus stops within approximately 150m of the site and Troed-y-Rhiw train station is within approximately 200m of the site.

Accident Data

Accident Data has been interrogated and it concludes that there has been no accidents recorded along Cardiff Road 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

Addendum

Following on from the submission of the further information by the applicant in the form of an amended Transport Statement and photographic parking survey, the highway authority still **recommend refusal** for the proposed application as the information submitted is not acceptable.

The highway authority raised concerns due to the lack of on-street parking available for the proposed site. The submitted parking survey is not acceptable as the applicant only took pictures (with no time stamp on the pictures) and did not submit a full parking survey as requested.

RECOMMENDATION

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

Given the concerns set out above the highway authority recommend **refusal** of the scheme given the lack of any off street parking and lack of evidence, as the proposal will result in additional on-street parking in an area where there is already substantial demand, to the possible detriment of highway safety.



pp Carwyn Morris CEng MICE

Head of Engineering and Highways