

PLANNING STATEMENT

Land at Hillcrest Park, Located off Haydn Terrace/ Mitchell Crescent, Merthyr Tydfil

August 2025



PLANNING
LIMITED

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1 Introduction

- 1.1 This Planning Statement accompanies a full planning application, submitted on behalf of the Merthyr Tydfil Housing Association for a development of 47 no. homes, landscaped informal open space and other associated works on land at hillcrest park located off Haydn Terrace/Mitchell Crescent, Merthyr Tydfil CF47 9JF, a site allocated for housing under policy SW3-16 of the LDP.
- 1.2 The application comprises a series of drawings and suite of technical information to demonstrate the suitability of developing the site for housing. The full list of plans and reports is noted below.

DOCUMENT / DRAWING	PREPARED BY	REFERENCE (IF APPLICABLE)
ARCHITECTURAL		
Design and Access Statement	Pentan Architects	4134-PEN-ZZ-ZZ-RP-A-9005-S4-P2
3D Visualisation 1	Pentan Architects	4134-PEN-XX-XX-VS-A-8500-S4-P1
3D Visualisation 2	Pentan Architects	4134-PEN-XX-XX-VS-A-8501-S4-P1
3D Visualisation 3	Pentan Architects	4134-PEN-XX-XX-VS-A-8502-S4-P1
3D Visualisation 4	Pentan Architects	4134-PEN-XX-XX-VS-A-8503-S4-P1
3D Visualisation 5	Pentan Architects	4134-PEN-XX-XX-VS-A-8504-S4-P1
Existing site constraints plan	Pentan Architects	4134-PEN-ZZ-XX-DR-A-0003-S1-P1
Proposed Site Sections	Pentan Architects	4134-PEN-ZZ-XX-DR-A-0005-S4-P1
SWOT Analysis	Pentan Architects	4134-PEN-ZZ-XX-DR-A-0075-S4-P1
Site Location Plan	Pentan Architects	4134-PEN-ZZ-XX-DR-A-0001-S4-P2
Existing Site Plan Topographical Survey	Pentan Architects	4134-PEN-ZZ-XX-DR-A-0002-S4-P2
Brick Type Key Plan	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-1011-S1-P2
Proposed Site Plan (roof plan)	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-1000-S4-P13
Proposed Site Plan (tier one)	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-1001-S4-P6
Proposed Site Plan (tier two)	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-1002-S4-P7

Proposed Site Plan (tier three)	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-1003-S4-P7
Type A & B	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-2000-S4-P5
Type C	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-2100-S4-P4
Type D	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-2200-S4-P5
Type E (End)	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-2300-S4-P5
Type E (Mid)	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-2310-S3-P4
Type F (End)	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-2400 -S4-P4
Type F (Mid)	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-2410-S4-P4
Type G	Pentan Architects	4134-PEN-ZZ-ZZ-DR-A-2500-S4-P5
LANDSCAPING, ECOLOGY, TREES & GI		
Outline Landscape Proposals	Tirlun Design Associates	TDA.3019.01 Rev F
Green Infrastructure Statement	Tirlun Design Associates	June 2025
Landscape Specification & Management Plan	Tirlun Design Associates	May 2025
Tree Survey	Treescene	September 2024
Tree Constraints Plan	Treescene	October 2024
Ecological Impact Assessment	Ecological Services Ltd	June 2025 V2.0
Preliminary Ecological Assessment	Ecological Services Ltd	January 2022
Preliminary Ecological Assessment	Ecological Services Ltd	June 2024
Reptile Survey Report	Ecological Services Ltd	May 2022
ENGINEERING		
Engineering sheet 1 of 2	PHG Engineering Consultants	2308 100-1 Rev C

Engineering sheet 2 of 2	PHG Engineering Consultants	2308 100-2 Rev C
Drainage Strategy Statement	PHG Engineering Consultants	May 2025
HERITAGE		
Archaeological and Heritage Assessment	The Environmental Dimension Partnership Ltd	edp7529_r002a
SITE INVESTIGATION		
Geotechnical and geoenvironmental report	Terra Firma	June 2025
PLANNING		
Planning Statement	LRM Planning	August 2025
Application Forms	LRM Planning	August 2025
PAC Report	LRM Planning	July 2025

BACKGROUND

- 1.3 This application follows a comprehensive pre-application process (LPA ref PA/24/0024) pursued in 2024, with advice formally received in January 2025. The advice received was accepting of the proposal but raised a number of points which required further consideration. This statement therefore intends to consider the advice received and sets out how this application directly responds to and addresses each point raised. In doing so, this statement demonstrates how the proposal constitutes an exemplar, sustainable form of residential development which aligns with both local and national planning policy frameworks.
- 1.4 Since 2021, the proposal has been developed in collaboration with the Welsh School of Architecture as part of a research-led initiative aimed at establishing a 'Merthyr Standard', a set of design and construction principles tailored specifically to the distinctive topography, landscape, climate, and cultural identity of Merthyr Tydfil. This research also directly addresses key societal and environmental challenges, including the local housing crisis, energy affordability, and the broader imperatives of the climate emergency and carbon reduction. The project aligns closely with the aspirations of the Placemaking Wales Charter.
- 1.5 The evolution of the proposal has been informed by extensive engagement and interdisciplinary collaboration. Since 2021, a series of workshops and presentations have been conducted with Council officers, stakeholders, local community members, and the Design Commission for Wales. This consultative process has been instrumental in shaping the scheme into a contextual, high-quality, placemaking exemplar, one that reflects the ambitions of all parties involved.
- 1.6 This planning application therefore represents the culmination of years of research, engagement, and design evolution, now formally submitted for consideration.

2 Site description and context

THE SITE

- 2.1 The site measures approximately 1 hectare. in area, forming part of a larger parcel of land which is approximately 2.2 hectares. The land parcel forms an irregular shaped informal area of open space which over the years has suffered with anti-social behaviour issues and now appears in an unkempt and unmanaged appearance.
- 2.2 The site is located off Hillcrest and Mitchell Crescent, which abut the southwest and western boundaries respectively. More specifically, the site is bounded:
- to the **north** by the northern portion of the wider site, a pathway connecting Mitchell Crescent to Marshall Crescent, and dwellings beyond;
 - to the **east** by the wider site, then dwellings on Haydn Terrace;
 - to the **south** by the cul-de-sac Hillcrest Road and further dwellings;
 - to the **west** by Mitchell Crescent.
- 2.3 The topography is extremely variable and steep in places, sloping from west to east, with a change in level of more than 12m, with the highest point in the south-west corner. The site is crossed by a number of informal footpaths which form pedestrian connections into the neighbouring estates.

SITE CONTEXT, CONSTRAINTS AND OPPORTUNITIES

- 2.4 The site is located to the North of Pen-y-Darren community, which sits 2km north of Merthyr Tydfil Town Centre. The site falls within the settlement boundary of Merthyr Tydfil (policy SW4) and is allocated for housing (Policy SW3-16).
- 2.5 The Cadw heritage maps confirms that the site is remote from anything of any specific value. It does not contain and is not near to any listed buildings. There are no Scheduled Ancient Monuments, Registered Parks and Gardens or other such assets which would need to be considered. The site is however located within the Merthyr Tydfil Landscape of Outstanding Historic Interest
- 2.6 The Natural Resources Wales flood maps for planning demonstrate that the site is in Flood Zone 1, which signifies areas not at risk from flooding.
- 2.7 Located 2km north of Merthyr Tydfil town centre, Pen y Darren offers a range of services and facilities. These are easily accessible by a short walk or bus from the site and include:
- Penydarren Post Office
 - Londis Shop
 - Gellifaelog Primary School
 - Blessed Carlo Acutis Catholic School
 - Penydarren BGC Football Pitch
 - Tiny Treasures Nursery
 - St Illtyd's Church
 - Morlais Health Centre
 - Prince Charles Hospital
 - Dowlais Community Centre
 - A cluster of restaurants and takeaways are also located to the northeast of the site along Roberts Avenue and Twelfth Avenue.

- 2.8 A wider range of facilities and amenities are located in Merthyr Town Centre, which is a 34-minute walk, 9-minute drive, 8 minute cycle or a 25-minute bus journey from the site.
- 2.9 The site benefits from good connectivity with bus stops present along Haydn Terrace, serving routes 27 and 33:
- Bus route 27 operates between Merthyr Bus Station and Prince Charles hospital
 - Bus route 33 operates between Merthyr Bus Station and Galon Uchaf via Penydarren
- 2.10 The nearest train station is Merthyr Tydfil, located in the town centre. It provides convenient links to Cardiff, Pontypridd, Swansea, Newport and other parts of South Wales and England, with many destinations reachable in under an hour.
- 2.11 In terms of the local vernacular, the dwellings directly adjacent to the site along Mitchell Crescent, Marshall Crescent and Haydn Terrace are all two-storey and semi-detached in character.
- 2.12 Further information in respect of the assessment of the character of the area is contained within the Design section below, as well as in the accompanying Design & Access Statement.

3 Pre-application engagement

- 3.1 MHA have undergone extensive pre-application engagement prior to finalising the detailed proposals. This has included working alongside the Welsh School of Architecture, engagement with the Design Commission for Wales (“DCfW”), the local planning authority (“LPA”), and the local community as summarised below.

THE WELSH SCHOOL OF ARCHITECTURE

Developing the ‘Merthyr Standard’

- 3.2 Since 2021, the scheme has formed part of a research-led initiative at the Welsh School of Architecture, aimed at developing the ‘Merthyr Standard’, a set of design and construction principles tailored specifically to the unique social, environmental, and architectural context of Merthyr Tydfil. As such, this project sits at the core of a rigorously researched initiative intended to serve as a model for places facing similar constraints and opportunities, as well as for future development in Merthyr. This process has enabled an exceptional level of attention to be given to the design and construction of the site, ensuring a highly contextual and responsive approach throughout

DESIGN COMMISSION FOR WALES

DCfW Presentation

- 3.3 The DCfW were engaged with in November 2023, which involved the development team presenting the proposals to the panel. A written response followed in November, which confirmed that the DCfW were supportive of the development and specifically found the proposal to be an ambitious and exciting response to a challenging site, aligned with Merthyr’s strategic design and policy ambitions.
- 3.4 In principle, they were supportive of what the scheme seeks to achieve but noted a number of considerations that would need to be addressed in the evolution of the design. These included the need for a clearer neighbourhood design analysis, refinement of the street and space hierarchy, better landscape definition (including boundary treatments and multifunctional green infrastructure), improved pedestrian connectivity, and detailed consideration of accessibility, servicing, and long-term management of public realm. They encouraged the team to prioritise quality over quantity, and to focus design on doing fewer things well.

LOCAL AUTHORITY ENGAGEMENT

2024 Pre-application enquiry

- 3.5 A pre-application enquiry was submitted to Merthyr Tydfil County Borough Council in August 2024 for a scheme of the same scale and quantum, comprising 47 homes.
- 3.6 A suite of information was provided as part of that enquiry, including proposed architectural plans, engineering drawings, a Preliminary Ecological Appraisal, a reptile survey as well as topographical surveys.
- 3.7 Written feedback was received in January 2025, with the main topics of comment being grouped under four main themes, namely:
- Design and layout;
 - Access and parking;
 - Ecology and Green Infrastructure, and;
 - Sustainable Drainage and Open Space.

- 3.8 The response highlighted the acceptability of the principle of development and revealed the support of the LPA over the scheme. It also raised minor tweaks regarding the points above which have been addressed directly in this final application and are discussed in more detail in the following sections.

COMMUNITY ENGAGEMENT

- 3.9 Following on from the process of community engagement undertaken by the applicant since 2021, the statutory Pre-Application Consultation ("PAC") is now currently being undertaken along with a non-statutory public engagement event for the community to attend. More information on this will be found in the PAC report which will be completed at the end of the process and support the planning application submission.

4 Design Approach and Layout

LAYOUT AND DESIGN APPROACH

- 4.1 The proposed layout and design have been influenced by the local vernacular, characterised predominantly by rows of two-storey dwellings which follow the natural slope of the land. This reflects the existing topography and grain of the surrounding area. The scheme adopts this principle, with new housing arranged to utilise level changes, thereby creating opportunities for enhanced views and solar gain.
- 4.2 Open spaces and streets have been carefully designed around the built form, with a clear intent to minimise the need for heavily engineered interventions. Instead, the proposed development is focused on soft landscaping and the creation of a more natural, pedestrian-friendly environment.

SPECIFICATION AND PERFORMANCE

- 4.3 From the outset, the development has been guided by the clear objective of reducing energy consumption. The proposed dwellings follow a Passivhaus design principle, being orientated to maximise passive solar gain during winter months, thereby reducing space heating demands. South-facing elevations incorporate large openings to capitalise on natural light, while fixed shading devices such as brise-soleil are provided to mitigate the risk of overheating in summer.
- 4.4 The scheme aspires to be an exemplar project for MTHA and the local authority, adopting the AECB (Association for Environment Conscious Building) standard – a recognised performance methodology endorsed by the Welsh Government for schemes in receipt of grant funding.
- 4.5 Unlike SAP-based approaches that rely on renewable ‘add-ons’, the AECB method prioritises a high-quality, well-detailed building fabric. This helps to eliminate the common ‘performance gap’ by ensuring that buildings perform as designed. Rigorous attention is paid to construction detailing, particularly at junctions, and a programme of independent, on-site monitoring will be in place to ensure quality and performance are maintained.
- 4.6 As a result, residents will benefit from low energy costs, with the well-insulated building envelope helping to lift occupants out of fuel poverty. While the emphasis is on fabric-first design, potential future provision for photovoltaic (PV) panels will be indicated on the final planning drawings, providing long-term flexibility.

RESPONSE TO LPA FEEDBACK

- 4.7 Engagement with the LPA has shaped the evolution of the design. Several comments were raised during the enquiry stage, primarily relating to layout, accessibility, and design detailing. These have been fully addressed within this full application as follows:

Surveillance of Central Pedestrian Route

- 4.8 The LPA expressed concern regarding blank gable ends facing the central pedestrian route, which could create areas lacking in natural surveillance and invite antisocial behaviour. In response, the revised design introduces windows to these gable ends, enhancing visibility and promoting a safer, more welcoming pedestrian environment, in line with placemaking principles.

Accessibility

- 4.9 While residential accessibility has been fully considered, the LPA raised concerns that the central pedestrian route, due to its steepness, may not be accessible to all users. Given the site's significant gradient, it was acknowledged that ramped access is impractical in this location. The evolved scheme addresses this issue by introducing alternative, more accessible routes elsewhere within the site. Specifically, a new connection has been created from Hillcrest in the south-east corner, traversing natural landscaping to link with the car park in the north-east corner. This ensures

inclusive access to key amenities and open spaces, while respecting the site's topographical constraints.

Water Channels and Maintenance

- 4.10 The original design proposed water channels throughout the site as an amenity and rainwater management feature. However, concerns were raised about the potential for these to accumulate litter and debris. Consequently, these features have been revised and replaced with planted swales and rain garden-style elements, which fulfil the same function while improving site biodiversity and visual amenity.

Boundary Enclosures

- 4.11 Given the dual-frontage layout and openness of the development, the LPA emphasised the need for high-quality boundary treatments, particularly where they are visible from the public realm. The initial proposal included timber fencing, which has now been superseded by more appropriate and visually robust alternatives. The revised scheme features decorative brick boundary walls for private gardens and high-quality metal railings along the central pedestrian route. These changes enhance the scheme's aesthetic quality and help ensure a cohesive and attractive streetscape.

Sustainable Drainage Systems (SuDS)

- 4.12 The development features a tiered central SuDS cascade, permeable paving, and underground attenuation tanks. These elements work together to manage surface water runoff, reduce flood risks, and ensure resilience against climate change impacts.
- 4.13 The SuDS components are strategically placed to enhance green infrastructure, promote biodiversity, and improve water quality. Native planting and continuous green corridors support local wildlife and create inviting public spaces.
- 4.14 This design ensures that surface water is managed sustainably, mitigating potential impacts on neighbouring properties. The incorporation of green spaces and water features enhances the quality of the environment, contributing to the overall well-being of the community.
- 4.15 Further details regarding SuDS can be found in the Drainage strategy which supports this application.

5 Access and Parking

- 5.1 The proposed development includes the creation of a new access point from Hillcrest, which is an adopted highway. The principle of this access has been accepted by the highway authority, and the access will be designed and constructed in accordance with adopted highway standards.
- 5.2 Within the development, a network of shared surface roads is proposed. This approach, which has been positively received, prioritises pedestrian movement and safety, reducing the dominance of vehicles. By fostering a more walkable, inclusive environment, this design supports key placemaking objectives and contributes to the creation of liveable, people-focused spaces.

RESPONSE TO LPA FEEDBACK

- 5.3 From communications with the local planning authority, comments were raised regarding access and parking. These comments are subsequently addressed below:

Parking Requirements

- 5.4 In line with the CSS Wales Parking Standards, residential developments are typically expected to provide one parking space per bedroom, up to a maximum of three spaces per dwelling. Comments from the local highways authority recommend 1 parking space for the 1-bedroom units and 2 parking spaces for the 2- and 3-bedroom units. They note that any shortfall of this would need to be subsequently justified.
- 5.5 The proposed development primarily comprises one and two-bedroom units, with a limited number of three-bedroom units. Due to site constraints, a balanced approach to parking provision has been taken, aiming to meet core requirements while recognising physical limitations and actual demand for dedicated parking bays.
- 5.6 The proposal delivers one allocated parking space per unit, with an additional two dedicated visitor bays. This provision is considered acceptable based on evidence from housing associations, which demonstrates that residents of affordable housing are statistically less likely to own private vehicles. As such, the parking strategy aligns with actual demand and is appropriate for the nature of the tenure and site context.
- 5.7 Furthermore, this approach supports broader sustainability objectives, encouraging a shift towards more sustainable travel behaviours. The site benefits from strong connectivity to public transport, with nearby bus stops and proximity to Merthyr Tydfil town centre further reducing the reliance on private car use and promoting active travel options.

Refuge Vehicles

- 5.8 Another comment raised was whether the proposed access through the site can accommodate refuge vehicles or whether some other arrangements need to put in place. Following the pre-application discussions the engineering team have been in liaison with the highways department to ensure that the proposed layout, including shared surface design, is fit for purpose. Tracking information has been prepared which demonstrates that refuse vehicles can navigate the layout thereby serving all of the proposed properties.

6 Ecology & Green Infrastructure

- 6.1 Edition 12 of PPW, the latest version of the framework, was published in February 2024. This version imposes a duty on competent authorities such as Merthyr Tydfil County Borough Council to conserve and enhance biodiversity and introduces a requirement for all planning applications to be accompanied by a green infrastructure statement.
- 6.2 Specifically, paragraph 6.2.1 states that: “A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal.

SITE DESCRIPTION AND EXISTING ECOLOGY

- 6.3 The application site predominantly comprises semi-improved grassland, interspersed with scattered scrub and gorse scrub, as well as areas of tall ruderal vegetation. Along the northern boundary, a number of likely self-seeded tree specimens have been identified, accompanied by a bramble scrub belt which extends around the eastern and southern perimeters. Additionally, Japanese Knotweed has been recorded just beyond the eastern boundary of the portion of the site to be developed.
- 6.4 Due to the surrounding built environment, the site is cut off from the wider GI network, with the local area also lacking in significant connectivity amongst habitats.

SUPPORTING ECOLOGICAL AND LANDSCAPE ASSESSMENTS

- 6.5 To ensure a comprehensive understanding of the site's ecological value and to inform the proposed development, the following technical reports and strategies accompany this planning application:
- Preliminary Ecological Appraisal
 - Tree Survey
 - Tree Constraints Plan
 - Reptile Survey
 - Ecological Impact Assessment
 - Landscape Specification and Management Plan
 - Outline Landscape Proposals
 - Green Infrastructure Statement

ENHANCEMENTS AND RECOMMENDATIONS

- 6.6 The final layout and landscape proposals have incorporated a series of mitigation and enhancement measures to conserve and improve biodiversity across the site. These include:
- Retention and protection of mature trees and trees of ecological value
 - Prioritisation of native species in all planting schemes, and the addition of 17 native trees to the northern and eastern periphery of the site
 - 1,870 square metres of hedgerow, wetland and meadow wildflower areas across the site
 - Sensitive lighting design, ensuring dark corridors are maintained, particularly to the north and east
 - Clearance of scrub and trees outside the bird nesting season, or under the supervision of a qualified ecologist

- Integration of wildlife-friendly construction practices to minimise harm to fauna
- Habitat compensation and enhancement, including habitat corridors along site peripheries
- Eradication and treatment of invasive species, including Japanese Knotweed
- Retention of undeveloped green corridors to the north and east, providing informal open space, biodiversity corridors, and sustainable drainage opportunities

Additional on-site biodiversity features will include:

- Bird nesting boxes installed on at least 25% of new buildings, suitable for a variety of bird species
- Bat roosting boxes on at least 25% of new buildings and selected retained trees
- Hedgehog-friendly boundary treatments to facilitate connectivity
- Provision of reptile hibernacula within retained habitat zones, designed in consultation with the project ecologist
- Development of a Landscape Management Strategy to ensure long-term stewardship of soft landscaping

6.7 More information can be found in the accompanying Green Infrastructure Statement and Landscape Management plan.

7 Planning policy framework

- 7.1 The planning policy context for the determination of this application is provided by national and local planning policy guidance. National guidance is set out within Future Wales, Planning Policy Wales and its accompanying Technical Advice Notes. Local policy comprises the adopted Merthyr Tydfil Replacement Local Development Plan 2016-2031 (adopted 2020), and its supporting Supplementary Planning Guidance (“SPG”) documents.

FUTURE WALES: THE NATIONAL PLAN 2040

- 7.2 Future Wales is Welsh Government’s top-tier national development framework. It is a strategy for addressing key national priorities through the planning system over the next two decades, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.
- 7.3 It is a spatial strategy which does not seek to take decisions that are most appropriately taken at the regional or local level but does provide a strategic direction for all scales of planning and sets out policies and key issues to be taken forward at the regional scale. One of the key aims of the document is to address issues which Welsh Government consider to be a priority at this time, with affordable housing identified as a critically important issue throughout Wales.
- 7.4 The document follows a sequential structure, with each section building on the previous one as follows, ‘Wales: An Overview’, ‘Setting and achieving our ambitions’, ‘Strategic and Spatial Choices: Future Wales’ spatial strategy’ and ‘The Regions’.

Wales: An overview

- 7.5 This chapter provides a broad overview of the country and its intricacies. It is a very high-level overview of the country, however it identifies housing, particularly affordable housing, as a key issue to address throughout the country stating that *‘Good quality affordable homes are the bedrock of communities and form the basis for individuals and families to flourish in all aspects of their lives. Future Wales provides evidence of the need for housing across Wales at both a national and regional level. This evidence demonstrates the need for a focus on increasing the delivery of social and affordable homes.’*

Setting and achieving our ambitions

- 7.6 A focus of Future Wales is to provide quality development in the right places for the right reasons. 11 Future Wales Outcomes are set out within the chapter, which collectively are a statement of where Wales wants to be in 20 years. Every part of Future Wales is concerned with achieving these Outcomes.
- 7.7 Each Outcome commences with the prefix ‘A Wales where people live...’ building on the statement to provide a vision of Wales in 2040. Of particular relevance to the proposal are the following outcomes, all following the same prefix:
- A Wales where people live:
1. ‘... and work in connected, inclusive and healthy places’.
 3. ‘... in distinctive regions that tackle health and socio-economic inequality through sustainable growth’.
 5. ‘...and work in towns and cities which are a focus and springboard for sustainable growth’.
 7. ‘... in places where travel is sustainable’
 9. ‘... in places that sustainably manage their natural resources and reduce pollution’
 10. ‘... in places with biodiverse, resilient and connected eco-systems’ and
 11. ‘... in places which are decarbonised and climate resilient’.

Strategic and Spatial Choices: Future Wales' spatial strategy

- 7.8 One of the opening paragraphs of this section states that *'the spatial strategy supports the Future Wales Outcomes. Decisions taken at a national level, including Welsh Government investment choices, will reflect the principles of the strategy and make positive contributions towards the national placemaking objectives.'*
- 7.9 Cities and large towns are identified as the main development areas through co-locating homes, jobs and services in these areas, aiming to utilise untapped potential of places and their infrastructure. A total of 19 policies are identified within this chapter. These include *'Strategic Placemaking'*, *'Supporting Urban Growth and Regeneration'*, and *'Delivering Affordable Homes'*, among others. The latter notes that providing homes in Wales at levels which meet our needs is a key priority and shift in delivery is required to meet this basic human need.

The Regions

- 7.10 Regional planning will play an increasingly important role in the future, and this chapter provides a strategic vision for North, Mid Wales, South West and South East regions, focusing on large scale projects and less on housing, it is therefore of lesser relevance to the proposal.

PLANNING POLICY WALES

- 7.11 Planning Policy Wales ("PPW") is the principal national planning policy documents which sets out the land use policies of the Welsh Government against which development proposals should be assessed. The latest version is the twelfth edition, published in February 2024.
- 7.12 The main thrust of PPW is to ensure that the planning system contributes towards sustainable development and improves the social, economic, environmental, and cultural well-being of Wales. Placemaking lies at the heart of PPW, with policy and development management decisions required to seek to deliver development that adheres to these principles.
- 7.13 In a bid to ensure placemaking is prioritised, and in order to aid in implementing the Well-being of Future Generations Act, policy topics within PPW have been grouped under four themes, namely *'Strategic and Spatial Choices'*; *'Active and Social Places'*; *'Productive and Enterprising Places'*; and *'Distinctive and Natural Places'*. Each of the four headed chapters is supplemented by detailed and interwoven policy, which seek to work together in delivering sustainable places.
- 7.14 PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. In this regard it seeks to achieve WG's well-being goals. All statutory bodies in Wales carrying out a planning function must exercise those functions with the principles of sustainable development as defined in the Well-being of Future Generations Act. Accordingly, paragraph 1.18 of PPW states emphatically that *'legislation secures a presumption in favour of sustainable development'*.
- 7.15 Figure 4 of PPW covers the Key Planning Principles of WG in seeking to achieve *'the right development in the right place.'* Development proposals must seek to deliver development that addresses these outcomes, albeit paragraph 2.20 recognises that not all of these outcomes can necessarily be achieved under every development proposal.
- 7.16 Another Key Planning Principle of WG is facilitating accessible and healthy environments, stating later in Figure 4 that *'Our land use choices and the places we create should be accessible for all and support healthy lives. High quality places are barrier-free and inclusive to all members of society. They ensure everyone can live, work, travel and play in a way that supports good physical and mental health.'*
- 7.17 Creating & sustaining communities is a subsequent Key Planning Principle, stating:
'The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good

quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives.'

Strategic and Spatial Choices

- 7.18 It is indicated within PPW that the first stage of the assessment of proposals must take place in respect of Strategic and Spatial Choices. In this regard it is stated that *'Effective strategic placemaking requires early collective consideration of placemaking issues at the outset... when developing specific proposals.'*
- 7.19 Paragraphs 3.3 through to 3.18 of PPW highlights the importance of good design in *'creating sustainable places where people want to live, work and socialise'*. To achieve good design development, proposals need to meet the five overarching aims of design which comprise of access, character, community safety, environmental sustainability, and movement.
- 7.20 Paragraph 3.6 states that *'Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children. There will often be wider benefits to be gained through the sensitive consideration of such provision, for example, whilst the presence of visual cues will be invaluable in assisting those with hearing loss to engage in a noisy environment, a navigable environment will benefit all. Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport.'*
- 7.21 Accessibility is covered between paragraphs 3.49 to 3.52, wherein it is stated that the overarching aim of spatial strategies should be minimising the need to travel, reducing reliance on the private car, and increasing walking, cycling and use of public transport.
- 7.22 PPW seeks to ensure that proposals achieve a broad balance between housing, community facilities, services, and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. Major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities should be sited within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.
- 7.23 PPW indicates at paragraphs 3.61-3.63 that development should be located so that it can be well serviced by existing or planned infrastructure.

Active and Social Places

- 7.24 A key theme of PPW is creating places that are active and social, this includes sustainable transport provision for housing development. The opening paragraphs to this chapter include the following aspiration of PPW:
- 'New development should prevent problems from occurring or getting worse such as the shortage of affordable homes, the reliance on the private car and the generation of carbon emissions.'*
- 7.25 PPW places importance on locating development so as to minimise the need to travel and increasing accessibility by modes other than the private car.
- 7.26 In terms of car parking paragraph 4.1.51 indicates that *'A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down.'*
- 7.27 In respect of housing, WG recognises the importance of a home to people's lives and indicates that the planning system must:

- *'identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- *enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and*
- *focus on the delivery of the identified housing requirement and the related land supply.'*

7.28 Paragraph 4.2.5 states that *'Planning authorities should plan for a mix of market and affordable housing types to meet the requirement and specifically consider the differing needs of their communities.'*

7.29 Paragraph 4.2.26 states that *'a community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications.'*

7.30 Paragraph 4.2.14 the need for diversity in housing delivery options is discussed stating *'When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs) and the custom and self-build sector, the opportunity to contribute to delivering the proposed housing requirement.'*[emphasis added]. PPW continues at 4.2.5 *'To assist in broadening the housing delivery options and enable the provision of housing by RSLs, SMEs and the custom and self-build sector, planning authorities should set a locally determined target for the delivery of housing on small sites. To facilitate this, planning authorities should maintain a register of suitable sites which fall below the threshold for allocation in their development plan.'*

Productive and Enterprising Places

7.31 This section relates primarily to economic development, tourism, infrastructure, the rural economy, energy, and waste, and is thus less applicable to this proposal.

Distinctive and Natural Places

7.32 This chapter of PPW covers a range of topics, including cultural heritage matters, natural assets, and environmental quality. The opening statement of the chapter states that: *'Development proposals should be formulated to look to the long-term protection and enhancement of the special characteristics and intrinsic qualities of places...Problems should be prevented from occurring or getting worse. Biodiversity loss should be reversed, pollution reduced, environmental risks addressed and overall resilience of ecosystems improved.'*

7.33 Paragraph 6.2.1 relates to Green Infrastructure and notes that *'at a local scale, [green infrastructure] might comprise parks, fields, public rights of way, allotments, cemeteries and gardens. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.'* Green infrastructure provides multiple benefits for social, economic and cultural as well as environmental resilience. These benefits are important in domestic environments where they can facilitate health and well-being related benefits.

7.34 At paragraph 6.2.9 PPW states *'Planning authorities must encourage the appropriate management of features of the landscape which are of major importance for wild flora and fauna in order to complement and improve the ecological coherence of the Natura 2000 network¹¹⁴. The features concerned are those which, because of their linear and continuous structure or their function as 133 'stepping stones' or 'wildlife corridors', are essential for migration, dispersal or genetic exchange. The development of networks of statutory and non-statutory sites and of the landscape features which provide links from one habitat to another can make an important contribution to ecosystem resilience and the maintenance and enhancement of biodiversity and the quality of the local environment, including enabling adaptation to climate change.'*

7.35 Paragraph 6.4.4 states *'All reasonable steps must be taken to maintain and enhance biodiversity and promote the resilience of ecosystems and these should be balanced with the wider economic and social needs of business and local communities.'*

TECHNICAL ADVICE NOTES

- 7.36 The following Technical Advice Notes ("TANs") are considered to be of relevance in the consideration of the proposal.
- TAN 2 – Planning and Affordable Housing (2006)
 - TAN 12 – Design (2016)
 - TAN 18 – Transport (2007)
- 7.37 TAN 2, published in June 2006, is of relevance to affordable housing developments, providing practical guidance on the role of the planning system in delivering affordable housing.
- 7.38 TAN 12 relates to Design and was updated in March 2016. It provides advice and information on a number of related areas including the definition of design for planning purposes; design considerations in planning decisions; and local planning authority design policy and advice.
- 7.39 TAN 18, which was published in March 2007, deals with Transport matters, and advocates locating development where there is good access by public transport, walking and cycling; generally advocating development at sustainable sites.

WELL-BEING OF FUTURE GENERATIONS ACT

- 7.40 The Well-being of Future Generations Act imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principles, and to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Its content is sought to be delivered through the planning system via the intertwining of the Act through PPW.

LOCAL DEVELOPMENT PLAN

- 7.41 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that decisions in relation to planning applications should be made in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the area comprises the **Merthyr Tydfil Replacement Local Development Plan 2016-2031** (adopted in 2020). The site is allocated under policy SW3.16 for 40 units and is expected to deliver affordable housing and other planning obligations in accordance with policy SW9.
- 7.42 The policies most pertinent to the development proposals are summarised below:
- 7.43 **Policy SW1** relates to the provision of new homes and sets out that a total of 2,821 additional homes will be required during the plan period, with 2,196 of these being delivered through allocated sites, such as that of the proposal. This requirement will help retain working aged people and support the projected levels of growth in Merthyr Tydfil.
- 7.44 **Policy SW2** relates to the delivery of affordable housing, which is a key issue both locally and nationally. The policy identifies two areas in the highest need of affordable housing across the county borough being Penydarren and Cyfarthfa wards, and the proposal site for 100% affordable housing falls in the ward of penydarren.
- 7.45 **Policy SW3** identifies the distribution of housing growth, which are concentrated within the main settlement of Merthyr Tydfil and are allocated under a Primary Growth Area- the proposal site falls under site 16 with a delivery timescale between 2024-2026 for 40 dwellings.
- 7.46 **Policy SW10** concerns the protection and improvement of open spaces and encourages development proposals which improve the quality, quantity or access to open spaces. It highlights how accessible and well-designed open spaces significantly improve well-being of children and adults and have good physical and mental wellbeing whilst creating a sense of place. Further, it is stated how well-planned environments reduce crime and mitigate against climate change, and along with health and well-being benefits, underpins sustainable development.

7.47 **Policy SW11** supports proposals which contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. It states that new developments should, amongst other things:

- Be appropriate to the local context;
- Integrate effectively with adjacent spaces;
- Contribute to the provision of green infrastructure;
- Allow access to the widest range of people as possible.
- Incorporate resource efficient and adaptive buildings and layouts.
- Minimise the demand for energy and utilise renewable energy resources, and
- Promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour.

It is also emphasised that new developments should integrate green infrastructure due to its other positive benefits. It further states that developments will need to be located in accessible locations with good connections to sustainable transport routes.

7.48 **Policy SW12** promotes developments which support a shift towards sustainable transport, including the enhancement of pedestrian routes, cycle, rain and bus facilities.

7.49 **Policy EnW1** concerns nature conservation and ecosystem resilience and highlights that developments will be required to promote the resilience of ecosystems through maintaining and enhancing biodiversity interests in line with The Environment (Wales) Act 2016. Biodiversity enhancement on sites can be achieved by incorporating green infrastructure features.

SUPPLEMENTARY PLANNING GUIDANCE (SPG)

7.50 The following SPG documents are applicable in consideration of the proposed development:

- Affordable Housing (March 2012)
- Sustainable Design (July 2013)
- Nature and Development (May 2015)

8 Conclusion

- 8.1 This Planning Statement is produced in support of a full planning application for the development of 47 no. homes, comprising of 19 one bedroom, 24 two bedroom, and 4 three-bedroom affordable units, directly responding to local housing needs, in addition to generous public open space and community infrastructure, vehicle parking, sustainable drainage, and associated works.
- 8.2 The principle of development is established by virtue of the site's location with the defined settlement boundary, as well as the sites allocation for housing under policy SW3-16 of the LDP.
- 8.3 The robust design proposals developed through the collaboration between the Welsh School of Architecture and Pentan Architects demonstrate how site constraints and landscape considerations have directly informed the final design. The steep topography of the site has been a key driver in shaping the scheme, with extensive interdisciplinary dialogue ensuring that the design is both contextually responsive and technically sound. This collaborative approach has been instrumental in the evolution of a scheme aligned with the emerging 'Merthyr Standard'.
- 8.4 In conclusion, the proposed development presents an exciting opportunity to deliver much-needed affordable homes in Merthyr Tydfil, directly addressing an identified local housing need on a site already allocated for housing. The scheme embraces key placemaking principles, prioritising pedestrian-friendly design, healthy lifestyles, and active travel. It also incorporates energy-efficient measures in line with Passivhaus design and modern sustainability standards.
- 8.5 As a well-considered and contextually appropriate addition to the local residential environment, the development is expected to make a positive contribution to the area. On this basis, it is respectfully recommended that Merthyr Tydfil County Borough Council grants planning approval.

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