

PRE-APPLICATION CONSULTATION REPORT

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

Prepared by LRM Planning Limited on behalf of Merthyr Tydfil Housing
Association

July 2025



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DOCUMENT CONTROL

Project:	Land at Hillcrest Park, located off Haydn Terrace/ Mitchell Crescent, Merthyr Tydfil	Job Number:	21.173
Client:	Merthyr Tydfil Housing Association	Date:	15/07/2025
Author Initial:	NW	Reviewer Initial:	SC
Issue:	2	Status:	
File Origin:	21.173/7.Community Involvement		

1 Introduction

- 1.1 This Pre-Application Consultation (PAC) report has been prepared on behalf of Merthyr Tydfil Housing Association, the applicant, to accompany a full planning application for a residential development comprising 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 location plan illustrating the extent of the development site is included at Appendix 1.
- 1.1 This report, and the consultation process, has been carried out in accordance with legislation provided by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. Specifically, the report complies with the requirement for major development (in this case, a site comprising of more than 10 dwellings and measuring 1,000sqm or more) to carry out a Pre-Application Consultation exercise with the local community, stakeholders, and specialist consultees.
- 1.2 This PAC Report outlines the legislative framework of the mandatory exercise; the methodology used; the outcome of the statutory exercise; the applicant's response to comments received; and a conclusion of the main findings.

2 Statutory Pre-Application Consultation requirements

- 2.1 This PAC Report has been prepared in line with legislation provided by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. A summary of the key requirements of this is provided below.

DISPLAY OF SITE NOTICES

- 2.2 The applicant must display a site notice in at least one place on or near the land to which the proposed application relates for a period of no less than 28 days before submitting an application for the proposed development. It is at the discretion of the applicant if the consultation period is to last longer than 28 days.

PUBLICATION OF DRAFT PLANNING APPLICATION

- 2.3 The applicant must make the draft planning application information available publicly. As per the guidance, when this takes the form of a webpage where the requisite information is freely available, the applicant must advertise a local library where residents are able to access the documents online. This must include draft planning application forms; scaled site location plan; all other scaled plans (site layout, floor plans, elevations); Design and Access Statement; and any information that would be needed in order to comply with any local validation requirements of the Local Planning Authority.

ADVERTISEMENT TO INTERESTED LOCAL PERSONS AND SPECIALIST CONSULTEES

- 2.4 The applicant must write to any owner or occupier of any land adjoining the land to which the proposed application relates. It is at the discretion of the applicant as to whether this advertisement extends beyond the mandatory requirements. The applicant must also consult 'community consultees' (local/community and Ward Councillors); and 'specialist consultees.' Specialist consultees comprise the list of consultees in schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by the 2016 Order. Within this list, the applicant must identify the relevant specialist consultees depending on the site and its context.

SUMMARY OF RESPONSES RECEIVED

- 2.5 The applicant must review and summarise the responses received from all persons and bodies consulted during the statutory 28-day period.

RESULTING ACTIONS FROM RESPONSES RECEIVED

- 2.6 The applicant must provide comments as to how each response received from consultees has been considered through the application.

3 Methodology

- 3.1 The requirements of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 were adhered to through the Pre-Application Consultation process. The following paragraphs outline the methodology that LRM Planning has followed on behalf of the applicant in respect of the proposed residential 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. The consultation took place between Monday 16th June and Monday 14th July 2025.

DISPLAY OF SITE NOTICES

- 3.2 Four bilingual site notices were produced and displayed at prominent and visible locations at:
- Southern end of Mitchell Crescent
 - Northern end of Mitchell Crescent
 - Southern end of Marshall crescent
 - Hillcrest, to the south of the junction to Marshall Crescent
- 3.3 The site notices, available at Appendix 2, were erected on Monday 16th June 2025. A map and photographs showing the locations that the notices were displayed are available at Appendix 3. A declaration of the posting of the site notices is supplied at Appendix 4.

PUBLICATION OF DRAFT PLANNING APPLICATION

- 3.4 On Monday 16th June 2025, LRM Planning, as the applicant's agent, displayed a draft planning application package on its website (www.lrmplanning.com), which was made available for the statutory 28-day consultation period. The information displayed on the LRM Planning website comprised the following:

Key Documents:

- Site Location Plan
- Proposed Site Layout
- Draft Application Forms
- Design and Access Statement Part 1
- Design and Access Statement Part 2
- Design and Access Statement Part 3

Reports:

- Ecological Impact Assessment
- Green Infrastructure Statement
- Outline Landscape Proposals
- Landscape Specification & Management Plan
- Tree Survey
- Tree Constraints Plan
- Engineering Sheet 1 of 2
- Engineering Sheet 2 of 2
- Geotechnical and Geoenvironmental Report

- Drainage Summary Statement
- Archaeological and Heritage Assessment
- Preliminary Ecological Appraisal 2024
- Preliminary Ecological Appraisal 2021
- Reptile Survey Report
- Planning Statement

Drawings:

- 3D Visualisation 1
- 3D Visualisation 2
- 3D Visualisation 3
- 3D Visualisation 4
- 3D Visualisation 5
- Existing Site Constraints Plan
- Proposed Site Sections
- SWOT Analysis
- Existing Site Plan Topographical Survey
- Proposed Site Plan (Tier One)
- Proposed Site Plan (Tier Two)
- Proposed Site Plan (Tier Three)
- Brick Type Key Plan
- House Type E (Mid)
- House Type C (Walk-up Flat)
- House Type F (Mid)
- House Type A & B
- House Type D (Assisted Bungalow)
- House Type E (End)
- House Type F (End)
- House Type G

ADVERTISEMENT TO INTERESTED LOCAL PERSONS AND SPECIALIST CONSULTTEES

- 3.5 The publicity to neighbours comprised a letter-drop to some 120 addresses, which included all adjoining landowners and the wider community, as identified by the development team.
- 3.6 A copy of the leaflet issued to local neighbours and land owners is provided at Appendix 5. This was accompanied by a copy of the notice contained at Appendix 2. A map of the surrounding area, showing the extent of the letter drop, is displayed at Appendix 6.
- 3.7 An email and attached notice were issued to the following persons in their roles as Ward Councillors for the locality:
- **Councillors Kevin Gibbs, David Isaac, and Jamie Scriven** as Ward Councillors for Penydarren, the ward in which the site lies.

- 3.8 A copy of the email issued to Ward Councillors is provided at Appendix 7.
- 3.9 An email and notice were also issued to the following bodies in their roles as identified specialist consultees in accordance with the requirements listed in the table under schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016:
- **Merthyr Tydfil County Borough Council Highways Authority** – as the development is likely to result in a material increase in the volume of traffic entering or leaving a classified road; the development proposes the formation, laying out or alteration of any means of access to a highway; and as an adjoining landowner.
 - **Natural Resources Body for Wales** – as the development site falls within 2km of a site of special scientific interest (Cwm Glo a Glyndyrys).
 - **Dŵr Cymru Welsh Water** – as the water and sewerage undertaker concerned and the development involves new residential development.
 - **Fire and Rescue Authorities** – as the floor space to be created by the development is 1,000 square metres or more; and development carried out on a site having an area of 1 hectare or more.
 - **Coal Authority** - as the development lies within an area which has been notified for the purpose of this provision to the local planning authority by the Coal Authority because of the presence of land instability risks from coal mining
 - **Cadw** – as the development measures over 0.5ha and is located within the registered historic landscape of Merthyr Tydfil and is within 2km of multiple designated historic assets.
- 3.10 The email was also addressed to the following non-statutory bodies voluntarily to provide an opportunity to comment on the proposed development prior to submission.
- **Heneb (Glamorgan and Gwent Archaeological Trust)**
- 3.11 A copy of the emails issued to specialist consultees is provided at appendix 8, which was issued with a copy of the notice at appendix 2 attached.

ADVERTISEMENT TO INTERESTED LOCAL PERSONS AND SPECIALIST CONSULTTEES

- 3.12 In addition to the above, the applicant undertook a public consultation event to engage the community and discuss the development proposals. The event was arranged by the applicant and publicised via a letter drop which replicated the extent of letter drop undertaken for the formal PAC process. It was held on Thursday 26th June from 4pm – 7pm at Gellifaelog School, Merthyr Tydfil. Approximately 10 residents attended the event, of which, one completed a response form as set out in Section 6.

4 Statutory Pre-Application Consultation and Non-statutory Public Engagement Results

- 4.1 During the consultation period, the responses received can be summarised as follows:
- One written response to the PAC was received from a local resident.
 - Responses were received from three specialist consultees in the form of CADW, Dŵr Cymru Welsh Water and Natural Resource Wales.
 - No response was received from Ward Councillors, the Highway Authority, South Wales Fire and Rescue, the Coal Authority or Heneb.
- 4.2 Appendix 9 includes the responses from specialist consultees.

LOCAL RESIDENTS' COMMENTS

- 4.3 One respondent, living on Mitchell Crescent, adjacent to the proposed development site, raised concerns regarding the proposed development obscuring their current views and the potential for daylight/ health concerns. They also raised concerns over the possible effect the proposed development would have on the value of their property.

STATUTORY BODIES' RESPONSES

- 4.4 **CADW** noted that there are no scheduled ancient monuments or registered historic parks and gardens that would be affected by the proposed development.
- 4.5 They listed the designated historic assets inside 3km of the proposed development, but confirmed that intervening topography, buildings, and vegetation block all views between them.
- 4.6 As a result, it was confirmed that the proposed development will have no impact on the setting of these designated historic assets.
- 4.7 **Dŵr Cymru Welsh Water (DCWW)** confirmed that the site is located within the immediate vicinity of a separate sewer network, and further downstream is the combined public sewerage system which drains to Cilfynydd Wastewater Treatment Works.
- 4.8 No problems are envisaged with the Waste Water Treatment works for the treatment of domestic discharge from the site.
- 4.9 They also advised that the site is crossed by two public sewers and that no part of any building will be permitted within the protection zone of the public sewer measured 3 metres either side of the centreline.
- 4.10 Further, they noted that the proposed development is subject to approval of SuDS features via SAB. They also noted that any additional surface water from the new development should not be discharged to combined systems because of the risk of pollution when combined systems overflow.
- 4.11 They went on to advise that foul flows can be accommodated within the public sewerage system and should be connected to the foul sewer between manholes SO05087101 and SO05087101 located in Mitchell Crescent.
- 4.12 Finally, DCWW confirmed that capacity is currently available in the water supply system to accommodate the development. Initial indications are that a connection can be made from the 100mm diameter watermain at grid reference 305733, 207934.
- 4.13 **Natural Resources Body for Wales (NRW)** confirmed that soil contamination was observed in 'hot spots' across the site with the highest concentrations within the former quarry infilled area and that risk to controlled water was considered low.

- 4.14 They noted that leachability testing was not completed on the soil samples to determine the mobility of contamination spots. As such, they advised on the following condition to be attached to any planning permission granted;
- 4.15 *'If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.'*
- 4.16 Their justification for the condition was as follows; *'To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.'*

5 The applicant's response

- 5.1 As required by the legislation governing the PAC process, this section summarises the comments received and provides the applicant's response to each. The comments are grouped into themes and addressed accordingly.

LOCAL RESIDENT

Nature of comment: The proposal will obscure views enjoyed for decades

Nature of comment: The proposal will restrict daylight which could affect our health

- 5.2 **Applicant's response:** The proposed development is situated on land allocated for residential use under Policy SW3.16 in the Merthyr Tydfil County Borough Council Local Development Plan (2016-2031). This allocation supports the Council's objective to meet housing demand and provide much needed affordable homes to accommodate Merthyr's growing need.
- 5.3 While it is acknowledged that any new development on the site is likely to be visible to neighbouring properties and may interrupt views over the site, this is not a material planning consideration. In terms of amenity considerations, the scheme has been designed to consider the site constraints and other standard separation and amenity standards in order to form a considered design which reflects the form and character of the area but does not give rise to any unacceptable amenity considerations.

Nature of comment: The effect on the/ future sale of such properties less attractive

Applicant's response: This concern is noted, however, the potential impact of a development on property prices is not a material planning consideration and therefore falls outside the scope of the planning application process.

CADW

- 5.4 CADW confirmed that no scheduled monuments or registered historic parks and gardens would be affected by the proposed development.
- 5.5 **Applicant's response:** This response is noted and requires no action.

DŴR CYMRU WELSH WATER

- 5.6 DCWW confirmed that foul flows generated from the proposed development can be accommodated within the public sewerage system and should be connected to the foul sewer between manholes SO05087101 and SO05087101 located in Mitchell Crescent.
- 5.7 Regarding the water supply, capacity is currently available in the water supply system to accommodate the development. Initial indications are that a connection can be made from the from the 100mm diameter watermain at grid reference 305733, 207934.
- 5.8 DCWW also advised that the proposed development is subject to approval of SuDS features via SAB. They also noted that any additional surface water from the new development should not be discharged to combined systems because of the risk of pollution when combined systems overflow.
- 5.9 They also advised that the site is crossed by two public sewers and that no part of any building will be permitted within the protection zone of the public sewer measured 3 metres either side of the centreline.
- 5.10 **Applicant's response:** The response is noted, with recommendations to be taken on board and sustainable drainage approval will be sought separately by the applicant. With regards to the site

being crossed by two public sewers, this has been accounted for in the design with all sewers being under footways or roads rather than buildings.

NATURAL RESOURCES BODY FOR WALES

- 5.11 NRW advised on the following condition to be attached to any planning permission granted;
- 5.12 *'If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.'*
- 5.13 Their justification for the condition was as follows; *'To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.'*
- 5.14 **Applicant's response:** This response is noted. The suggested condition is standard/template condition and no objections would be raised to the condition being imposed on any permission which may be granted.

6 Non-statutory public consultation event

- 6.1 In addition to the statutory pre-application consultation, a public consultation event was also organised by the applicant. The replicated the consultation undertaken through the statutory PAC process in terms of consultation of neighbours and ward members. This event was held during the statutory PAC process and provided an opportunity for local residents and other interested parties to view the proposed plans and design of the development and allowed them to give feedback on the proposals. Details of the event are contained in Section 3.

FEEDBACK FROM LOCAL RESIDENTS AND INTERESTED PARTIES

- 6.2 Whilst approximately 10 people attended the event, one feedback form was completed and returned for consideration.
- 6.3 The response received was from a local resident, and is summarised below:

THOUGHTS, COMMENTS OR QUESTIONS
I think this is a positive venture
This brings more affordable homes to the area, helping those who need them
Please can there still be lots of green areas and flowers to make the area attractive

RESPONSE TO FEEDBACK FROM LOCAL RESIDENTS / INTERESTED PARTIES

- 6.4 Our responses to the thoughts, comments and questions have been grouped together from the table above

Community needs

Nature of comment: Positivity of bringing affordable homes to those who need them

- 6.5 **Applicant's response:** This comment is welcomed and noted. No further action is required.

Landscaping/ green areas

Nature of comment: Query regarding the preservation of green areas and flowers

- 6.6 **Applicant's response:** The proposal incorporates sympathetically designed landscaped areas around the site, with the design of the site being primarily informed by its natural landscape. Large undeveloped areas to the north and east of the site will be retained as existing grassland, in addition to;
- Over 50 new trees to be planted on the northern and eastern edges, as well as within the development;
 - 1,484 square metres of hedgerow, wetland and meadow wildflower areas across the development; and
 - private landscaped gardens.

- 6.7 By providing well-designed and attractive green infrastructure, the development serves future residents needs, exceeds policy requirements for green infrastructure and open space and also results in a net increase in biodiversity value of the site.
- 6.8 More information on this can be found in the supporting outline landscape proposals, green infrastructure statement and the landscape management plan.

7 Conclusion

- 7.9 This PAC report is submitted as part of a full planning application for the development of a full planning application for a residential development comprising 47 no. homes, landscaped informal open space and other associated works on Land at Hillcrest Park located off Haydn Terrace/Mitchell Crescent, Merthyr Tydfil. This report is a statutory requirement and addresses all matters required by Article 1 of the Town and Country Planning (Development Management Procedure) (Wales)(Amendment) Order 2016. It has been demonstrated herein that the applicant has undertaken all measures necessary to comply with guidance.
- 7.10 Alongside the planning application, this report demonstrates that the issues raised by the local residents and specialist consultees have either been addressed as part of the application; or justified in planning terms.
- 7.11 The finalised proposals that form part of the planning application are therefore the result of an iterative process that has sought to engage the local community. It is also asserted that the development is entirely appropriate given its context, and for these reasons, as well as the considerations put forward in other supporting documents, it is considered that Merthyr Tydfil County Borough Council should recommend the approval of this planning application.

LRM Planning
July 2025

Appendix 1. Site location plan

Appendix 2. Notice displayed on site and issued to interested parties

Appendix 3. Photographs and aerial map of locations for display of site notices

Appendix 4. Declaration of display of site notice

Appendix 5. Copy of letter issued to local owners and occupiers

Appendix 6. Map of surrounding streets showing extent of letter drop

Appendix 7. Copy of correspondence issued to Councillors

Appendix 8. Copy of correspondence issued to specialist consultees

Appendix 9. Copy of comments received from specialist consultees

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