

INTERNAL MEMORANDUM

To: David Cross - Development Control Case Officer

Reference: P/24/0133

From: Planning Policy and Implementation Section

Ask for: David James

Extension: 7053

Date: 27th June 2024

Summary

No objection raised (subject to the FCA being found acceptable by NRW (Policy EnW4)). The development meets the relevant Replacement LDP policies (SW4, SW13 and EcW7).

If minded to approve in principle, particular consideration should be given to the impact of the development on the character of the area, the character of the Grade 2 Listed Building the impact on local amenity in terms of visual amenity, loss of light and privacy, noise and disturbance, traffic generation and parking provision (Policies SW11, SW12, CW1 and EnW4).

As the application site is located within a flood zone, the requirements of Policy EnW4, in relation to flood risk, should also be noted and NRW consulted.

Observations in respect of the above proposal

1. Proposed Development

Application for an extension to the existing hotel, to provide additional bedrooms, together with alterations to the car park and associated works, at Travel Inn, Duffryn Road, Pentrebach.

2. Development Plan Framework

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.*
- *LDP Objective 15 Leisure, Recreation and Tourism: To support sustainable tourism, leisure and recreation developments and encourage an all year round tourism industry.*

The following development plan policies would apply:-

- *Policy SW4: Settlement Boundaries*
- *Policy SW9: Planning Obligations*
- *Policy SW10: Protecting and Improving Open Spaces*
- *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 EnW3 Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species*
- *Policy EnW4: Environmental Protection*
- *Policy EcW7: Tourism, Leisure and Recreation Development*

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)*

National Planning Policy

Future Wales – The National Plan 2040

Future Wales – The National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system. Matters relevant to this application include:

- **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

Planning Policy Wales (Edition 12, February 2024)

Planning Policy Wales provides guidance on matters relevant to this application, namely:

- Placemaking in Action
 - Good Design Making Better Places
 - Sustainable Management of Natural Resources
- Strategic Placemaking
 - Previously Developed Land
 - Accessibility
- Living in a Place
- Activities in Places
 - Community Facilities
- Recognising the Special Characteristics of Places
 - The Historic Environment
 - Biodiversity and Ecological Networks
- Recognising the Environmental Qualities of Places

3. Policy Considerations

The Merthyr Tydfil Replacement Local Development Plan (2016 - 2031)

The site of the proposal is located within the Primary Growth Area, 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 SW9 relates to Planning Obligations. However, given the nature of the proposal, on-site provision of affordable housing or open space, or a financial contribution towards affordable housing, would not be sought, nor would CIL be chargeable.

Policy SW10 states that development proposals that improve the quality, quantity or access to open space will generally be supported. Development proposals that would have an unacceptable adverse impact on or result in a loss of open space will not be permitted unless:

- It would not cause or exacerbate a deficiency of open space in accordance with the Council's open space standards or;
- The majority of the open space can best be retained and enhanced through the redevelopment of a small part of the site or;
- Satisfactory equivalent community benefit or enhanced compensatory provision can be provided in accordance with the Council's open space standards and
- In all cases, the open space has no significant nature or historic conservation importance.

Part of the application site (which is entirely within the grounds of the hotel/restaurant is within an area of designated Open Space. However, this area will not be affected by the proposed development. As such, it would not be contrary to Policy SW10.

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;
- 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.
- incorporate a range of inclusive/adaptable design specifications, a mix of house types, tenures and sizes to meet identified local needs;
- incorporate measures to improve ground and surface water quality wherever possible;
- provide adequate facilities and space for waste collections and recycling;
- promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour.

Considering the location of the application site, in close proximity to, existing dwellings, particular consideration should be given to the impact of the proposal on local amenity, loss of light, privacy and visual impact. Similarly, and given that the proposal would result in an intensification of the existing use, the impact of the increased traffic movements on local amenity and highway safety should also be carefully considered.

The proposal would result in the loss of a number of parking spaces which currently serve the hotel/restaurant. As such, the 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.

LDP 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 SW13 states that the provision of new and enhanced community facilities will be supported, subject to satisfying other relevant LDP policies.

The proposed development would result in an increase in the number of rooms offered by the hotel. As such, this would enhance the facility, and the proposal would therefore be in accordance 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. 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 restaurant located within the application site is a Grade 2 Listed building, and the proposal is located within a Landscape of Outstanding Historic Interest in Wales. As such, the impact of the proposal on these, and any other relevant historic assets should be taken into consideration, and the views of the relevant Officer or external Heritage body sought in this regard. It is noted that a Heritage Impact Statement has been submitted with the application.

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 the Environmental Health department, should be sought as appropriate.

The application site lies partly within Flood Zone C2 as illustrated on the LDP Constraints Map, and Zones 2 and 3 on the Natural Resources Wales environmental data maps. Paragraph 6.6.26 of PPW11, which considers development and flood risk, states that reference should be made to TAN 15: Development and Flood Risk and that “Developments located within flood risk areas remain at risk from flooding even if mitigation measures are applied.” Paragraph 6.6.29 further states “the ability of emergency services to respond to flood events should be taken into account when considering if a development is appropriate.”

Section 5 of TAN 15 considers the vulnerability of different land uses to flooding and identifies three separate development categories: emergency services, highly vulnerable development, which includes hotels, and less vulnerable development (Paragraph 5.1, Figure 2). Figure 2 further indicates that in C2 zones, i.e. areas of the floodplain without significant flood defence infrastructure, consideration should not be given to highly vulnerable development. Furthermore, paragraph 6.2 states that “new development should be directed away from zone Cin zone C the tests outlined in sections 6 and 7 will be applied, recognising, however, that highly vulnerable development and emergency services in zone C2 should not be permitted”. It is noted that an FCA has been submitted with the application. As such, the views of NRW should be sought.

Policy EcW7 states that tourism, leisure and recreation development within settlement boundaries is generally supported, particularly where they aid the revitalisation and regeneration of the Town and Local Centres.

The proposed development includes an extension to an existing hotel, located within the settlement boundary. As such, it is considered to comply with Policy EcW7.