



T O M P K I N T H O M A S

Planning Statement

Including Green Infrastructure Statement



THE CREATION OF SIX HOLIDAY LETS

Pandy Farm
Brecon Road
Merthyr Tydfil
CF47 8PA

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Client	Mr Kevin Jones
Project	Six holiday lets
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1. Introduction

1.1 The application

- 1.1.1 This Planning Statement is prepared by Tompkins Thomas Planning on behalf of Mr Kevin Jones in support of an application seeking planning permission and listed building consent for:

The change of use of buildings to form six units of holiday accommodation along with the operational development and other works necessary to facilitate the use

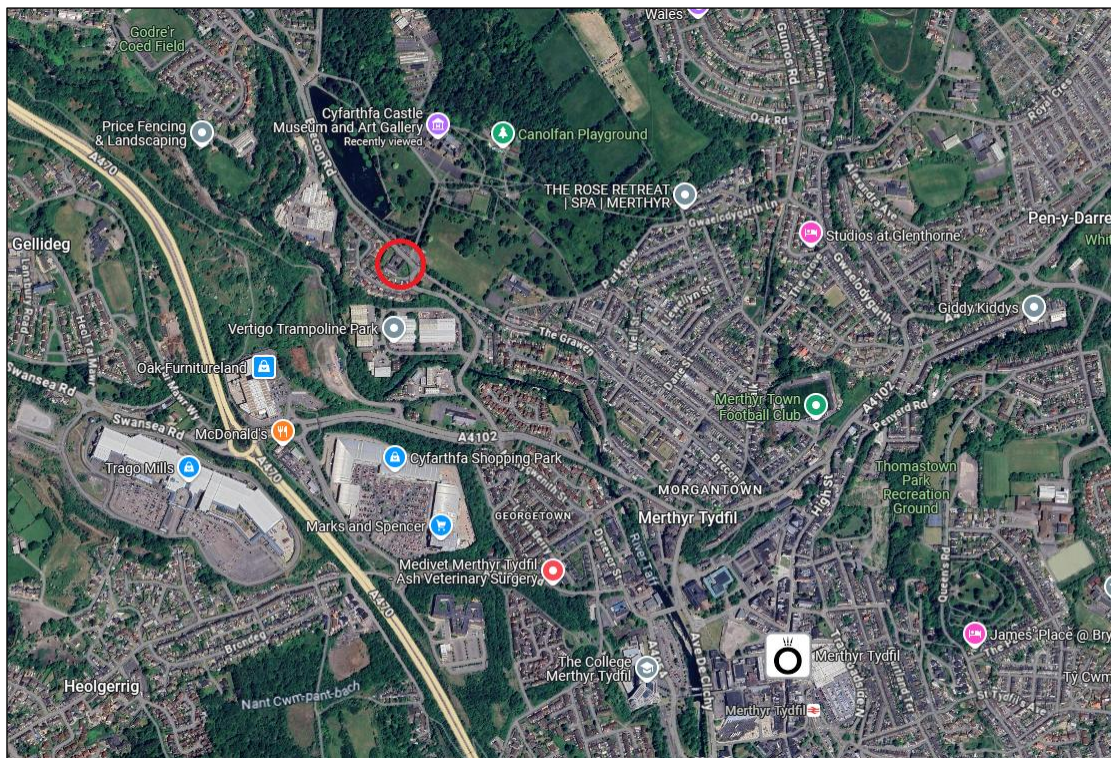
- 1.1.2 The proposals would enable the optimal viable use of Grade II listed buildings whilst creating overnight accommodation which contributes to the Council's aspirations to make Merthyr Tydfil into a year-round visitor destination.
- 1.1.3 The proposed development has been designed by Rural Office and informed by specialist advice provided by Sam Hale (Heritage), Ecology (Planning Ecology), and Lime Transport (Highway safety and movement).
- 1.1.4 In our opinion, the main planning issues are likely to be the principle of development, impact on the significance of designated heritage assets, and highway safety and movement.
- 1.1.5 The application is made following the Council's positive pre-application advice.
- 1.1.6 The application comprises this statement, the completed application forms, the requisite planning fee and the following plans and reports:
- The Location Plan;
 - Suite of existing and proposed plans (Rural Office);
 - The Design and Access Statement (Rural Office);
 - Heritage Statement (Rural Office);
 - Heritage Impact Assessment (Rural Office);
 - Window and Doors Conditions Survey (Rural Office);
 - Bar Report and Ecology Assessment (Ecology Planning);
 - Structural Survey and Report (Mann Williams);
 - Drainage Strategy (Mann Williams);
 - Transport Technical Note (Lime Transport).

2. The Site, it's Context and History

2.1 The Site

- 2.1.1 The site comprises Pandy Farm, an early nineteenth-century model farm complex which includes the farmhouse, clocktower and associated agricultural buildings. The site contains four individually listed buildings; the farmhouse and three barns, and lies predominantly within the Cyfarthfa Conservation Area.
- 2.1.2 The buildings are arranged around two principal courtyards, reflecting their historic function as both a working farm and an estate management complex. The farmstead survives as a largely intact example of a planned model farm and is recognised as being of considerable historic and architectural significance.

Figure 1: Site Location



- 2.1.3 The site occupies a prominent position within Merthyr Tydfil, at the junction of Cyfarthfa Road and Brecon Road, to the northwest of the town centre. It benefits from three existing access points: two from Brecon Road, including access beneath the stone archway and through an adjacent timber gate, and a third access from Cyfarthfa Road serving the southern range of

buildings.

- 2.1.4 The farmhouse is currently occupied by the applicant and his family as their principal residence. It has recently been restored. The southern range of buildings accommodates four commercial and storage units occupied by small businesses, predominantly within the building trades. The remaining buildings are used for storage associated with the applicant's construction business, including tools, materials and equipment.
- 2.1.5 Pandy Farm occupies a strategically important location within the proposed 100-hectare expansion of Cyfarthfa Park, a major heritage-led regeneration initiative known as the Cyfarthfa Plan. The site is directly opposite the Grade I listed Cyfarthfa Castle and is situated within a heritage-rich landscape containing several nationally important assets, including the Scheduled Monuments of the Cyfarthfa Ironworks and Pont-y-Cafnau Bridge.
- 2.1.6 The main public entrance and car park serving Cyfarthfa Castle and Park are located immediately opposite the site on the eastern side of Brecon Road. The stone boundary wall and railings which form the southern boundary of the park are separately Grade II listed.
- 2.1.7 Whilst parts of Pandy Farm are currently underutilised, the site retains considerable potential for sensitive and beneficial reuse. The buildings vary in their condition, with some requiring repair and structural intervention, including roof repairs and localised masonry consolidation. However, the complex remains structurally sound and capable of conversion. Overall, the site represents a significant heritage asset whose conservation and adaptation provide an opportunity to secure its long-term future while contributing positively to the wider regeneration objectives for the Cyfarthfa area.

2.2 Designations

- 2.2.1 The site comprises four Grade II listed buildings. The stone boundary wall for Cyfarthfa Park and Castle on the opposite site of Brecon Road is also Grade II listed.
- 2.2.2 The site is mainly within the Cyfarthfa Conservation Area. The southern range of buildings; South Stables, Tack and Mess Room, and Stabling and Forge, are beyond the boundary of the Conservation Area as identified on the Council's interactive map.

2.3 Planning History

- 2.3.1 Pandy Farm has been the subject of a series of planning permissions and listed building consents in recent years, all of which have been approved. The applications have principally related to the repair, maintenance and conservation of the listed buildings, demonstrating a sustained commitment by the owners to secure the long-term preservation and enhancement of the historic farmstead.
- 2.3.2 In April 2022, planning permission and Listed Building Consent were granted under references **P/22/0089** and **P/22/0102** for the installation of a new access gate. During the same period, Listed Building Consent **P/22/0090** was approved for the reconfiguration of internal spaces together with repair, refurbishment and replacement of windows within the listed buildings.
- 2.3.3 Further works relating to the conservation of the site followed in December 2022 through the approval of planning permission **P/22/0315** and Listed Building Consent **P/22/0317**. These consents enabled the re-roofing of the south stables, coach house stables and coach house, including the relaying of slate roofs, provision of new ridge details, eaves boards and rainwater goods, together with the installation of conservation rooflights.
- 2.3.4 In July 2023, Listed Building Consent **P/23/0150** was approved for amendments to the paint colours of window cills, rainwater goods, door surrounds and timber doors, ensuring that external finishes remained sympathetic to the significance of the listed buildings.

3. The Application Proposal

3.1 Overview

- 3.1.1 The proposals comprise the comprehensive restoration and conversion of the historic farmstead to provide six holiday accommodation units together with associated parking, servicing and landscaped areas. The development has been informed by a detailed understanding of the farmstead's historic evolution and retains the established arrangement of buildings around the principal courtyard.
- 3.1.2 The scheme has been designed to preserve the historic spatial hierarchy of the site. The main foldyard remains the principal organising space within the complex, whilst the lower stable courtyard and rickyard would continue to function as distinct external spaces. The accommodation units are distributed through the existing buildings in a manner which respects their historic form and relationship to one another.
- 3.1.3 The Farmhouse and Clock Tower remain in their existing use and do not form part of the holiday accommodation proposals.

3.2 Access

- 3.2.1 Vehicle access is taken from the existing entrance from Brecon Road. Parking is concentrated within a discrete area within the Rickyard, allowing the historic courtyards to remain largely free from vehicles and preserving their character and appearance. A total of seven parking spaces, including an accessible space, are provided together with cycle storage facilities within the Coach House.
- 3.2.2 The historic stone entrance opening serving the rickyard remains in use, with the existing, modern timber gates removed in accordance with discussions with the Local Planning Authority and Highway Authority. The arrangement allows vehicles to access the site whilst minimising intervention to historic fabric.

3.3 Site Layout

- 3.3.1 The site layout is entirely led by the existing buildings and their interrelationships. The development provides six holiday accommodation units. Two two-bedroom units are

accommodated within the South Stables, Tack Room and Mess Room. Two three-bedroom units are provided within the Cow Housing, with a further three-bedroom unit within the Stabling and Forge and a final three-bedroom unit within the Threshing and Combination Barn. Each unit benefits from its own independent access and external amenity space.

3.4 Buildings and Works

- 3.4.1 The proposals involve the repair, restoration and conversion of the existing listed buildings together with a modest extension to the Cow Housing. The approach has been informed by detailed heritage and structural assessments and seeks to retain the significance, character and legibility of the farmstead.
- 3.4.2 The majority of works relate to the adaptation of existing buildings for holiday accommodation use, including the adaption of internal layouts, provision of services and carrying out of carefully considered alterations. The internal layout and compartmentalisation of units is informed by the buildings existing and historic structure as opposed to being optimised for modern living. Existing openings are utilised wherever possible, with new interventions limited to those necessary to secure a viable and functional use.
- 3.4.3 A modest extension is proposed to the north-western end of the Cow Housing. The extension occupies the footprint of a former building known to have historically existed on the site and follows its established dimensions and alignment. It therefore reflects the historic evolution of the farmstead whilst providing the accommodation necessary to support the proposed use.
- 3.4.4 The works also include the repair of historic fabric, replacement of inappropriate modern alterations where necessary, structural improvements, thermal upgrades and the installation of modern building services.

3.5 Drainage and services

- 3.5.1 The proposals incorporate the infrastructure necessary to support the holiday accommodation, including electricity, water supply, foul drainage, refuse storage and servicing facilities. Air source heat pumps are incorporated within the development to provide an efficient and sustainable source of heating.
- 3.5.2 Plant and refuse storage areas are located within the north-western section of the Threshing

Barn, providing a discreet and centralised servicing area for the development.

- 3.5.3 A drainage strategy by Mann Willians accompanies the application. The strategy confirms that foul and surface water can be managed separately through a combination of existing infrastructure and sustainable drainage measures.
- 3.5.4 Surface water would be managed through permeable paving, soakaways, swales and other infiltration features designed to attenuate runoff and mimic natural drainage processes.
- 3.5.5 Foul drainage would connect to the existing drainage network serving the site and discharged to the public sewer.

3.6 Landscaping

- 3.6.1 The proposals retain the defining landscape features of the farmstead, including the principal courtyards, rickyard, stone walls and established boundaries. The rickyard provides garden space associated with the accommodation units and accommodates part of the parking provision. The lower stable courtyard serves the South Stables accommodation.
- 3.6.2 Landscape works are focused on the enhancement and management of the existing setting, ensuring that the historic relationship between buildings and spaces remains legible and that the character of the farmstead is preserved. Existing stone boundary walls are retained and repaired where necessary.

4. Pre-Application Advice

4.1 Initial meeting and advice

- 4.1.1 The proposals have been the subject of extensive pre-application engagement with Merthyr Tydfil County Borough Council. A formal pre-application enquiry was submitted under reference **PA/25/0021** for a similar development to that which this application relates.
- 4.1.2 A site meeting was held on 12th August 2025, following which the Council issued a detailed written pre-application response dated 12th September 2025. The response incorporated comments from Planning, Building Conservation, Highways and Ecology Officers and provided a comprehensive assessment of the proposals.
- 4.1.3 The Council confirmed that the site lies within the settlement boundary of Merthyr Tydfil and acknowledged that the principle of converting the buildings to holiday accommodation was acceptable. The pre-application response concluded that the adaptive reuse of the historic buildings represented an appropriate and sustainable form of development capable of securing the long-term future of an important heritage asset. In particular, the Council stated that *“the proposal for the repair, conservation and adaptive reuse of the historic buildings at Pandy Farm is broadly welcomed and is acceptable in principle”*.
- 4.1.4 The Council further recognised that the scheme would provide a viable long-term use for a highly significant but underutilised historic complex whilst contributing towards heritage-led tourism and the wider regeneration objectives associated with the Cyfarthfa area.
- 4.1.5 The Council's assessment of heritage matters was similarly positive. The Building Conservation Officer identified the farmstead as a highly significant group of early nineteenth-century estate buildings associated with Cyfarthfa Castle and the Crawshay Estate and expressed broad support for the conservation-led approach adopted by the scheme. Positive comments were made regarding the repair of historic fabric, the reinstatement of original openings, the retention of significant internal features and the sensitive adaptation of the buildings to secure a viable long-term use.
- 4.1.6 The proposed extension to the former Cow House was also considered capable of being acceptable, with the Council acknowledging that it occupies the footprint of a former historic

structure and that a contemporary design approach could be appropriate where carefully detailed and subordinate to the historic buildings.

- 4.1.7 Whilst requests were made for additional information relating to repair methodologies, windows, doors, rooflights, utilities and construction details, these were matters of detail rather than concerns for the principle.
- 4.1.8 The main concern in the advice related to the proposed access arrangements and parking provision within the historic rickyard. In particular, concerns were raised regarding the proposed realignment of the curtilage-listed boundary wall and the extent of parking originally proposed. The Council advised that these elements had the potential to cause unnecessary harm to the significance of the listed buildings and the character and appearance of the Conservation Area and recommended that alternative solutions be explored.
- 4.1.9 The Council advised that ecological surveys would be required in support of any planning application, including a Preliminary Ecological Appraisal and bat assessment. Particular regard was required to the known bat roost within part of the building complex together with the need to provide biodiversity enhancements and a Green Infrastructure Statement. These matters have subsequently informed the design of the proposals and the accompanying ecological mitigation strategy.

4.2 Follow up meeting and advice

- 4.2.1 Following the formal response, a revised access and parking strategy was developed which substantially reduced the level of heritage impact associated with the proposals. Four options were prepared for the Council's assessment. An additional meeting was held and response issued by the Council.
- 4.2.2 The Highway Authority subsequently confirmed that the existing access arrangements could be retained, subject to the submission of a Transport Statement demonstrating that traffic generation associated with the proposed holiday accommodation would be comparable to, or less than, the lawful agricultural use of the site.
- 4.2.3 The Highway Authority also advised that the existing access width should be retained, the existing gate arrangement should remain unaltered, visibility requirements could be achieved without significant intervention to the historic boundary wall and that seven parking spaces

would be sufficient to serve the development. A “No Left Turn” sign within the site was also recommended.

- 4.2.4 Importantly, the Building Conservation Officer confirmed that this revised approach was preferable from a heritage perspective because it reduced the extent of intervention to historic fabric and minimised harm to the significance of the site. The reduction in parking provision similarly addressed earlier concerns regarding visual clutter and the erosion of the historic character of the rickyard.

4.3 Summary

- 4.3.1 Overall, the Council has confirmed that the principle of converting the buildings to holiday accommodation is acceptable and has broadly supported the conservation-led approach to the restoration and reuse of the listed buildings. An acceptable approach to access arrangements, parking provision and impacts upon the historic rickyard have also been agreed.

5. Planning Policy and Material Considerations

5.1 The Planning and Compulsory Purchase Act (2004)

- 5.1.1 Section 38(6) explains that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.1.2 In this case, the statutory Development Plan for the area comprises the **Merthyr Tydfil Replacement Local Development Plan 2016 – 2031**).
- 5.1.3 Other material considerations in this case include **Planning Policy Wales – Edition 12**, the suite of Technical Advice Notes, particularly **TAN 13 – Tourism**.

5.2 Planning Policy Wales

- 5.2.1 PPW 12 recognises that Tourism is a vital component of the Welsh economy, with planning playing a central role in supporting sustainable tourism that contributes positively to communities, the environment, and the wider economy.
- 5.2.2 Paragraphs 1.1.27–28 of identify tourism as a main driver of economic growth and local regeneration. Tourism is viewed not only as a visitor-based industry but as an integrated sector that supports the vitality of communities and which contributes to the long-term viability of local services. PPW12 encourages local authorities to promote high-quality, year-round tourism opportunities that align with the principles of sustainable development.
- 5.2.3 Tourism developments are also required to preserve and enhance the historic environment. Paragraphs 6.1.14–6.1.17 advise that proposals within or near designated historic assets must be sensitively designed to sustain their heritage value. Developments that support cultural tourism and reinforce the distinct identity of a place are actively encouraged.
- 5.2.4 Paragraphs 6.6.30–6.6.31 stress the importance of integrating tourism development with sustainable transport options. Proposals should be located to minimise car dependency and should provide good access to walking, cycling, and public transport networks.

5.3 TAN 13: Tourism

- 5.3.1 TAN 13 provides detailed guidance on interpreting and applying national policy for tourism.

Although published prior to PPW Edition 12, it remains extant.

- 5.3.2 TAN13 explains that tourism developments should be located where they can make best use of existing infrastructure and minimise travel demand. Sites should be accessible, especially for those without a car.
- 5.3.3 It also requires that proposals are of a high-quality design, harmonising with the landscape and maintaining the character of the local area.

5.4 Merthyr Tydfil Replacement Local Development Plan

- 5.4.1 The RLDP explains that tourism is a strategic growth sector central to the borough's economic regeneration and cultural vitality. Objective 15 champions *"sustainable tourism, leisure and recreation developments"* with the aim of fostering a year-round visitor economy.
- 5.4.2 Policy EcW7, titled 'Tourism, Leisure and Recreation Development', is the most important local policy for tourism development. It explicitly supports tourism facilities within settlement boundaries, particularly where they contribute to town centre vitality and heritage regeneration .
- 5.4.3 Paragraph 6.7.57 emphasises the importance of tourism to the local economy, noting ambitions for a *"365-day visitor destination"* built upon Merthyr's natural and built heritage.
- 5.4.4 Several main tourism assets are highlighted as suitable for investment and development through the Plan's strategy. These include Cyfarthfa Park and Castle—a Grade II* historic park and museum which is immediately northeast of the Site. Cyfarthfa Park and Castle benefits from an extensive regeneration plan to transform the site into, *"a cultural centre and visitor attraction of international quality and an engine of social renewal"*.
- 5.4.5 The RLDP encourages adaptive reuse of heritage structures in ways that advance cultural tourism and community engagement.
- 5.4.6 Paragraph 6.7.59 explains that overnight visitors tend to use other attractions and make use of Merthyr Tydfil as a base to explore the surrounding areas such as the Brecon Beacons National Park.

6. The Principle of Development

6.1 Tourism use

- 6.1.1 The proposed development comprises the conversion and adaptation of existing listed farm buildings at Pandy Farm to provide six units of holiday accommodation. The proposals seek to secure the long-term future of a significant but underutilised heritage asset through a form of development that is strongly supported by national and local planning policy.
- 6.1.2 The site lies within the settlement boundary of Merthyr Tydfil where tourism, leisure and recreation development is supported in principle. RLDP Policy EcW7 specifically supports tourism development within settlement boundaries, particularly where it contributes towards the vitality of the area, heritage-led regeneration and the creation of a year-round visitor economy. The RLDP identifies tourism as a strategic growth sector and recognises the importance of investment in attractions associated with the Cyfarthfa Heritage Area, including Cyfarthfa Park and Castle.
- 6.1.3 The site occupies a highly prominent location immediately opposite Cyfarthfa Castle and within the area identified for the wider Cyfarthfa regeneration project. The accommodation would provide a unique opportunity for visitors to stay within a historic estate farmstead whilst providing direct access to one of the area's most important visitor destinations. The development would therefore contribute towards the Council's aspirations to establish Merthyr Tydfil as a year-round tourism destination and support the ongoing regeneration of the Cyfarthfa Heritage Area.
- 6.1.4 National policy similarly provides strong support for the proposals. PPW 12 identifies tourism as an important driver of economic growth, regeneration and community vitality. It encourages the provision of high-quality visitor accommodation in sustainable locations and recognises the role that tourism can play in supporting local economies and cultural heritage. TAN 13 further supports tourism development where it makes effective use of existing infrastructure, is accessible by a range of transport modes and contributes positively to the character and identity of an area.

6.2 Sustainability

- 6.2.1 The site is exceptionally well located in sustainability terms. It occupies a central location within the urban area of Merthyr Tydfil, within walking distance of the town centre, railway station, bus services, shops, services and visitor attractions. A bus stop is located immediately adjacent to the site, providing regular connections throughout the town and wider region. The development therefore represents a highly sustainable form of tourism accommodation which enables visitors to access local attractions without undue reliance on the private car.

6.3 Heritage

- 6.3.1 The principle of development is strengthened further by the heritage benefits arising from the proposals. Planning Policy Wales and TAN 24 recognise that securing the optimal viable use of a listed building is often the most effective means of ensuring its long-term preservation. The buildings at Pandy Farm are highly significant heritage assets associated with the development of Cyfarthfa Castle and the wider Crawshay Estate. Whilst the buildings remain structurally sound, substantial parts of the complex are currently underutilised and require ongoing investment, repair and maintenance if their significance is to be preserved.
- 6.3.2 The proposed holiday accommodation would provide a sustainable and economically viable use that is entirely compatible with the character and significance of the buildings. The development would generate the investment necessary to facilitate repairs, conservation works and the ongoing management of the complex. In doing so, it would secure the long-term future of a group of listed buildings that make a substantial contribution to the significance of both the Cyfarthfa Conservation Area and the wider historic environment of Merthyr Tydfil.
- 6.3.3 The proposals have evolved through extensive engagement with the Local Planning Authority, Conservation Officers and Highway Officers. Through that process it has been demonstrated that the buildings can be successfully adapted for holiday accommodation whilst preserving their significance, that safe and appropriate access arrangements can be achieved using the existing access infrastructure, and that parking requirements can be accommodated without causing unacceptable harm to the historic character of the site. The development therefore represents a conservation-led solution which balances heritage considerations with the practical requirements of bringing the buildings back into productive use.

6.4 Section Conclusion

6.4.1 Overall, the proposal delivers multiple social, economic, and environmental objectives. It secures the optimal viable use of important listed buildings, supports the regeneration ambitions of the Cyfarthfa Heritage Area, contributes towards the local visitor economy, provides high-quality overnight accommodation in a sustainable location and ensures the long-term conservation of a significant heritage asset.

6.4.2 Accordingly, the principle of development is strongly supported by Planning Policy Wales, TAN 13, TAN 24 and RLDP Policies SW4, CW1, CW2 and EcW7.

7. Green Infrastructure Statement

- 7.1.1 Planning Policy Wales (PPW12) places Green Infrastructure at the heart of the planning process and requires development to adopt a stepwise approach to the protection and enhancement of ecological and landscape assets. This approach seeks first to avoid impacts upon existing green infrastructure, secondly to minimise any unavoidable impacts, and finally to compensate for residual effects whilst delivering enhancements wherever possible.
- 7.1.2 The proposals have been developed in accordance with this approach. Existing vegetation and landscape features have informed the design process from the outset, with the development focused within the existing farmstead and previously developed areas of the site. This limits encroachment into undeveloped land and enables the retention of important landscape features wherever practicable.
- 7.1.3 Where vegetation loss is unavoidable, the proposals provide compensatory planting and habitat enhancement measures. Only one small tree is identified to be removed adjacent the access. New native trees, shrubs and species-rich planting will be introduced throughout the site, strengthening landscape structure, improving habitat connectivity and reinforcing the rural character of the area. This will mainly be focussed on the site's northern boundary which already includes trees and planting. These measures will be complemented by Biodiversity Net Gain provision and the long-term management of planted areas to ensure their successful establishment.
- 7.1.4 The Ecological Assessment confirms that the site is capable of accommodating the proposed development without unacceptable effects on protected species or habitats and identifies opportunities to improve the ecological value of the site through habitat creation and enhancement measures. The proposals therefore move beyond mitigation and deliver a stronger and more resilient green infrastructure network than presently exists.
- 7.1.5 The applicant will accept a condition requiring approval of a detailed Landscape and Biodiversity Enhancement scheme.
- 7.1.6 Overall, the development follows the stepwise approach advocated by PPW12 by avoiding unnecessary impacts on existing green infrastructure, truly minimising those impacts that cannot be avoided, and delivering meaningful ecological and landscape enhancements. As

such, the proposals contribute positively to biodiversity, landscape character and the wider green infrastructure network.

8. Heritage matters

8.1 Policy context

8.1.1 **PPW 12** emphasises the need to conserve and enhance the historic environment as a key objective of sustainable development.

8.1.2 Paragraph 6.1.5 confirms that the historic environment *“encompasses all aspects of the environment resulting from the interaction between people and places through time,”*. Heritage assets are recognised as finite resources that should be carefully managed for the benefit of present and future generations.

8.1.3 Policy guidance at paragraph 6.1.10 states that *“there should be a general presumption in favour of the preservation of the special interest of listed buildings.”* This includes both the architectural and historic interest of the building itself and any features that contribute to its character. The policy also highlights the importance of securing the long-term conservation of such assets.

8.1.4 Paragraph 6.1.11 emphasises the need to secure optimal viable uses for listed buildings. In full, it states that (our emphasis):

“Where a development proposal affects a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. This should not prevent the best viable use being found, provided the character and special interest of the building are safeguarded.”

8.1.5 This highlights that preserving the special interest of a heritage asset remains paramount, but adaptive reuse or changes that enable the building to have a long-term sustainable function is essential too.

8.1.6 Paragraph 6.1.15 reinforces this principle, stating:

“The aim should be to find the best way to protect the special architectural or historic interest of such assets, which may include securing their long-term conservation

through an appropriate and viable use.”

8.1.7 Paragraph 6.1.14 underlines the need for development proposals affecting listed buildings or their settings to be supported by a thorough understanding of the asset's significance. This should inform the design process, and any proposals must demonstrate how they preserve or enhance that significance.

8.1.8 **TAN 24: The Historic Environment** provides detailed guidance in support of the policies set out in Planning Policy Wales, specifically relating to the assessment and management of the historic environment, including listed buildings.

8.1.9 TAN24 makes clear that the significance of a listed building is central to decision-making. Paragraph 5.2 advises that applicants must understand and clearly communicate the building's special architectural and historic interest as part of any proposal.

8.1.10 Importantly, TAN 24 does not preclude change but requires that any proposals should conserve or enhance the building's special interest in accordance with the statutory test.

8.1.11 Paragraph 5.10 notes:

“The aim should be to sustain the heritage values of the building in an appropriate manner, through sensitive management.”

8.1.12 Paragraph 5.9 advises that local planning authorities must consider whether the proposal would harm the building's special interest, and if so, whether there is clear and convincing justification for the harm. The level of information and analysis required should be proportionate to the asset's significance and the impact of the proposals.

8.1.13 TAN 24 also supports the principle of securing a long-term, sustainable use for listed buildings. Paragraph 5.14 states:

“The continued use or the introduction of new uses which are compatible with the character and significance of the listed building can be the most effective way to ensure its preservation.”

8.1.14 The **Merthyr Tydfil Local Development Plan** recognises the historic environment as a valuable and irreplaceable resource that contributes significantly to the area's identity, character, and

sense of place. The Plan supports the conservation, enhancement and positive management of historic assets, including listed buildings, conservation areas, and archaeological remains.

- 8.1.15 Policy CW1: Historic Environment is the principal policy guiding development in relation to heritage assets. It states:

“Development proposals that would have an impact upon the historic environment must preserve or enhance the character and appearance of archaeological sites, scheduled ancient monuments, listed buildings, conservation areas and historic parks and gardens, their setting and any other features of local historic value.”

- 8.1.16 This policy establishes a presumption in favour of the preservation of designated heritage assets and their settings. It is consistent with national policy, requiring that development proposals should demonstrate how the historic character, significance and setting of heritage assets will be conserved or enhanced.

- 8.1.17 The supporting text to the policy explains that the Council will expect applications to be accompanied by appropriate levels of information and assessment, such as Heritage Impact Assessments or Conservation Statements, where relevant. This reflects the importance of understanding the significance of the asset and the nature of the proposed impact, in line with best practice and national guidance.

8.2 Assessment

- 8.2.1 The application is supported by a Heritage Statement and Heritage Impact Assessment prepared by Rural Office. The documents advise that Pandy Farm is a heritage asset of considerable significance, comprising a Grade II listed former estate farmstead associated with the Grade I listed Cyfarthfa Castle, the Grade II* Registered Park and Garden and the wider Cyfarthfa Conservation Area.

- 8.2.2 The Heritage Statement provides a detailed assessment of the significance of Pandy Farm, its contribution to the Cyfarthfa Conservation Area and its relationship with Cyfarthfa Castle and the wider historic estate. This accords with the requirements of PPW12 and RLDP Policy CW1, both of which require proposals affecting heritage assets to be informed by an assessment proportionate to their significance.

- 8.2.3 The Statement identifies Pandy Farm as a highly significant group of listed buildings associated with the former Cyfarthfa Estate. The significance of the site derives not only from the individual buildings, but also from the survival of the farmstead as a coherent group, its historic relationship with Cyfarthfa Castle and its contribution to the character and appearance of the Conservation Area. The Statement also identifies that the setting of the farmstead has changed significantly over time, with the former agricultural landscape largely replaced by modern development.
- 8.2.4 The HIA confirms that the proposals have been informed by a detailed understanding of the significance of the site and have been designed to secure its long-term conservation through a viable and sustainable use. The development retains the principal historic buildings, preserves the historic layout of the farmstead and incorporates the repair and restoration of important historic fabric. The proposals also provide opportunities to remove or improve unsympathetic modern interventions and better reveal the significance of the heritage asset.
- 8.2.5 The HIA goes on to identify several interventions which give rise to limited harm to significance. However, these works are required to facilitate the viable reuse of the buildings and have been carefully designed to minimise impacts on historic fabric and character. The assessment concludes that any harm is localised and limited in extent, whilst the wider scheme secures substantial heritage benefits through the repair, restoration and long-term occupation of the buildings.
- 8.2.6 Importantly, the HIA conclude that the proposals provide a sustainable future for a historically important farmstead which is presently underutilised. The development secures the optimum viable use of the buildings, ensures their continued maintenance and conservation and provides opportunities to better reveal their significance. The proposals also strengthen the contribution which the farmstead makes to the significance of the Cyfarthfa Conservation Area and the wider historic environment.

8.3 Section Summary

- 8.3.1 Overall, the Heritage Statement and Heritage Impact Assessment conclude that the proposals would conserve the significance of the listed buildings and preserve the character and appearance of the Cyfarthfa Conservation Area. Where limited harm arises, it is necessary to facilitate the viable reuse of the buildings, has been minimised through careful design and is

outweighed by the substantial public benefits arising from the long-term conservation, repair and sustainable reuse of this important heritage asset.

8.3.2 Accordingly, the proposals accord with PPW12, TAN 24 and RLDP Policy CW1.

9. Summary of technical matters

9.1 Highway Safety

- 9.1.1 A Transport Technical Note has been prepared by Lime Transport in support of the proposals. The assessment confirms that the development can be accommodated using the existing access onto Brecon Road, with no alterations required to the historic access arrangement. The Local Highway Authority has accepted the principle of retaining the existing access, subject to a restriction preventing vehicles from turning left when exiting the site, with visitors instead directed towards the nearby mini-roundabout. Swept-path analysis demonstrates that vehicles can safely access, manoeuvre within and leave the site.
- 9.1.2 The development includes seven parking spaces, including one accessible space, within the existing rickyard. This provision is sufficient to serve the six holiday lets and accommodate servicing and changeover activity. The assessment further demonstrates that the required visibility splays can be achieved and that the proximity of the mini-roundabout naturally reduces vehicle speeds on approach to the site access.
- 9.1.3 Importantly, the report concludes that the proposed holiday lets are unlikely to generate any greater level of traffic than the site's existing agricultural use. Indeed, based on TRICS data, the development is anticipated to generate between 13 and 28 vehicle movements per day, which is comparable to, and potentially lower than, the range of traffic movements associated with the lawful agricultural use of the site. The proposals therefore would not intensify use of the access or give rise to any adverse highway safety impacts.
- 9.1.4 The proposal accords with the transport objectives of RLDP Policies BW12 and SW11. The development utilises an existing, safe access and provides appropriate parking, servicing and turning facilities to ensure that the site can operate safely and efficiently. The proposals therefore provide a safe and convenient means of access whilst ensuring that the operation of the surrounding highway network is not prejudiced.
- 9.1.5** The development also complies with PPW 12 which seeks to integrate transport considerations into the design process and ensure that development is accessible, functional and safe. Appropriate parking provision, cycle storage and servicing arrangements have been incorporated into the scheme from the outset and in agreement with the Council, ensuring that

the development is capable of operating effectively whilst respecting the character of the site and its surroundings.

9.2 Biodiversity

- 9.2.1 An Ecological Assessment and Bat Survey has been prepared by Ecology Planning in support of the application. The assessment confirms that the site is of relatively low ecological value, comprising largely managed amenity areas, existing buildings and fragmented boundary vegetation typical of an urban setting. No designated nature conservation sites, priority habitats or other ecological features of significance would be adversely affected by the development.
- 9.2.2 Bat surveys undertaken in both 2022 and 2025 recorded only low levels of activity, principally involving small numbers of common pipistrelle bats. Buildings D–H have already been restored under a Natural Resources Wales licence and incorporate a range of bat mitigation features which monitoring confirms are functioning successfully. Whilst Buildings B and C support minor bat roosts, the report concludes that any impacts can be appropriately mitigated through a further NRW licence and the provision of replacement roosting features within the restored buildings. Subject to these measures, no significant ecological effects are anticipated.
- 9.2.3 The assessment also confirms that no notable bird species were recorded and that impacts to nesting birds can be appropriately managed through standard mitigation measures. Importantly, all significant boundary vegetation would be retained.
- 9.2.4 The proposals include biodiversity enhancements in the form of native planting, strengthened boundary vegetation, bat and bird features, invertebrate provision and habitat improvements.
- 9.2.5 The report concludes that these measures would more than offset the limited habitat loss associated with the development and would result in a modest net gain for biodiversity. Overall, the proposals are considered capable of proceeding without significant ecological harm and would secure an ecological enhancement of the site.
- 9.2.6 The proposals therefore accord with RLDP Policies EnW1, EnW2 and EnW3, which seek to protect biodiversity, ecological networks, protected species and habitats whilst securing opportunities for enhancement wherever possible.

- 9.2.7 The proposals also accord with PPW12, which requires development to follow a step-wise approach to biodiversity conservation and secure a net benefit for biodiversity wherever possible. Through the retention of important ecological features, implementation of appropriate mitigation measures and delivery of meaningful biodiversity enhancements, the development safeguards ecology whilst improving the overall value of the site.
- 9.2.8 Accordingly, the proposals comply with the ecological objectives of the Development Plan and national planning policy.

9.3 Drainage and Flood Risk

- 9.3.1 The application is accompanied by a drainage strategy by Mann Williams which confirms that foul drainage will connect with the main sewer via existing below ground pipes. Surface water would be managed through permeable paving, soakaways, swales and other infiltration features designed to attenuate runoff and mimic natural drainage processes. It is also relevant that the drainage proposals have been designed to reduce pressure on existing infrastructure in dealing with surface water within the site.
- 9.3.2 Accordingly, the development incorporates sustainable drainage principles and demonstrates that it can be accommodated without increasing flood risk or giving rise to adverse drainage impacts in accordance with the drainage requirements of Policy SW11 and PPW12.

9.4 Neighbouring amenity

- 9.4.1 The proposals have been designed to ensure that neighbouring amenity is preserved. The development is contained almost entirely within the existing farmstead and utilises existing buildings, thereby avoiding significant new built form or activity beyond the established developed footprint.
- 9.4.2 The layout is informed by the historic arrangement of the site, with parking and circulation concentrated within existing areas of the farmstead.
- 9.4.3 Existing separation distances, established boundary vegetation and the orientation of buildings ensure that opportunities for overlooking, loss of privacy and overbearing effects are limited.
- 9.4.4 The Council's pre-application advice confirms that the relationship with neighbouring dwellings is generally acceptable.

- 9.4.5 The proposals therefore maintain a satisfactory standard of amenity for neighbouring occupiers and accord with the requirements of RLDP Policy SW11.

10. Summary and Conclusions

- 10.1.1 The proposal is a heritage-led development which secures the long-term future of an important group of listed buildings through the introduction of a viable and sustainable tourism use. The application has been informed by extensive specialist input, including heritage, ecology, transport, structural and drainage assessments, all of which demonstrate that the development can be accommodated without giving rise to unacceptable impacts.
- 10.1.2 The principle of development is strongly supported by national and local planning policy. The site lies within the settlement boundary of Merthyr Tydfil where tourism development is supported in principle. The proposals would directly contribute towards the objectives of PPW12, TAN 13 and RLDP Policy EcW7 by providing high-quality visitor accommodation within a highly sustainable location and supporting the Council's aspiration to create a year-round visitor economy.
- 10.1.3 The development would make a significant contribution to the ongoing regeneration of the Cyfarthfa Heritage Area. The site occupies an important location immediately opposite Cyfarthfa Castle and Park and within an area identified for substantial heritage-led investment. The proposals would create a distinctive tourism offer which complements those wider regeneration initiatives whilst bringing a currently underutilised heritage asset into productive use.
- 10.1.4 Heritage matters have been central to the evolution of the scheme. The submitted Heritage Statement and Heritage Impact Assessment confirm that the proposals preserve the significance of the listed buildings and the character and appearance of the Cyfarthfa Conservation Area. The development retains the principal historic buildings, preserves the historic layout of the farmstead and secures extensive repair and restoration works throughout the complex. Whilst limited harm has been identified in certain respects, it is necessary to facilitate the viable reuse of the buildings, has been minimised through careful design and is substantially outweighed by the public benefits arising from the long-term conservation and sustainable use of the site. The proposal leads to net heritage gain.
- 10.1.5 The Transport Technical Note demonstrates that the development can be safely accommodated using the existing access arrangements and that traffic generation would be comparable to, or less than, the site's lawful agricultural use.
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- 10.1.6 The Ecological Assessment confirms that the development would not result in significant ecological harm and would deliver biodiversity enhancements through habitat creation, native planting and species-specific mitigation measures.
- 10.1.7 The Drainage Strategy demonstrates that foul and surface water can be appropriately managed through a combination of existing infrastructure and sustainable drainage measures.
- 10.1.8 The proposals have also been developed in accordance with the Green Infrastructure principles advocated by PPW12. The scheme retains important landscape features, minimises impacts upon existing vegetation and delivers meaningful enhancements through new planting, habitat creation and biodiversity improvements.
- 10.1.9 The proposals can also be accommodated without giving rise to unacceptable impacts on neighbouring amenity in accordance with Policy SW11.
- 10.1.10 Overall, the proposals represent a sustainable form of development which secures the optimal viable use of a highly significant heritage asset, supports tourism and economic growth, contributes towards the regeneration of the Cyfarthfa area and safeguards the historic and environmental qualities of the site. The development accords with PPW12, TAN 13, TAN 24 and the relevant policies of the RLDP.
- 10.1.11 The development will also assist the Council in achieving Objective 15 of the RLDP which is:

To support sustainable tourism, leisure and recreation developments and encourage an all year-round tourism industry.

- 10.1.12 Accordingly, the application proposal complies with the Development Plan and there are no material considerations which indicate that planning permission should be withheld. Likewise, the proposals preserve and enhance the significance of the listed buildings and Conservation Area such that listed building consent should also be granted.



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