

Land at Common Road, Merthyr Tydfil

Planning Statement

McDonald's Restaurants Ltd

07 October 2025

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1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of McDonald's Restaurants Ltd ('the applicant'). It accompanies a full planning and advertisement consent application in relation for the development of land at Common Road, Penygarnddu Business Park, Merthyr Tydfil.

1.2 The application seeks permission for the following development:

“Demolition of existing buildings and development of a restaurant with drive-thru facility (Use Class A3) including access and cycle/footpath, servicing, car parking, hard and soft landscaping, advertisements and other associated works.”

1.3 The purpose of this statement is to assess the application proposals against the statutory development plan for the site, as well as other material considerations. This statement should be read alongside the following documents which form the application submission:

- 1 Application forms and certificates, and the requisite planning application fee;
- 2 Application drawings, prepared by AEW Architects;
- 3 Design and Access Statement, prepared by Lichfields;
- 4 Community Consultation Statement, prepared by Lichfields;
- 5 Economic Operator Statement, prepared by Lichfields;
- 6 Employment Land Statement, prepared by Lichfields;
- 7 Heritage Statement, prepared by Lichfields;
- 8 Transport Assessment, prepared by ADL;
- 9 Delivery Management Plan, prepared by ADL;
- 10 Ecological Appraisal, prepared by EDP;
- 11 Arboricultural Survey, Impact Assessment, Method Statement, prepared by EDP;
- 12 Tree Constraints Plan, prepared by EDP;
- 13 Tree Protection Plan, prepared by EDP;
- 14 Green Infrastructure (GI) Statement, prepared by EDP;
- 15 Detailed Planting Plan, prepared by EDP;
- 16 Hardscape Plan, prepared by EDP;
- 17 Landscape and Visual Appraisal, prepared by EDP;
- 18 Landscape and Ecological Management Plan, prepared by EDP;
- 19 Lighting Strategy, prepared by Lauk Lighting;
- 20 Drainage Statement (including Ground Investigations, Coal Mining Risk Assessment, and Contamination Report), prepared by Glanville;

- 21 Drainage Management Plan, prepared by Glanville;
- 22 Construction Environmental Management Plan, prepared by Glanville; and,
- 23 Odour Control Assessment, prepared by CDM Partnership.

1.4 The structure of the statement is as follows:

- **Section 2.0** describes the application site and its context;
- **Section 3.0** describes the proposed development;
- **Section 4.0** sets out the relevant planning policy context;
- **Section 5.0** assesses the proposal in the context of the Town Centres First Sequential Test;
- **Section 6.0** assesses the proposal against the statutory development plan;
- **Section 7.0** sets out other material considerations of the proposed development; and,
- **Section 8.0** provides a summary and set of conclusions arising from matters considered in this Planning Statement.

2.0 Site context

Site description and its surroundings

- 2.1 The proposed development site, measuring approximately 0.42 ha, is situated within Pengarnddu Business Park and comprises previously developed land in a predominantly industrial setting. Figure 2.1 outlines the site area.

Figure 2.1 Site Location Plan



Source: AEW

- 2.2 The site is currently vacant, with evidence of fly tipping, hazardous materials such as barbed wire, and poorly maintained boundaries. It includes one residential property and one vacant A3 building.
- 2.3 The ground is a mix of hardstanding and infill material, with a large bund of infill, refuse and other material to eastern perimeter supporting self-seeded vegetation, including scrub and several young trees of varying ecological value.
- 2.4 Surrounding and adjoining the site is a council-owned yard to the south, at a lower level and Lidl car park to the west, which sits on higher ground. Other surrounding uses include the Asda Supermarket to the west beyond the Lidl, and a home furnishing shop on the northern side of Common Road.
- 2.5 The site is located just to the south of the Pengarnddu Protected Employment Site (Policy EcW2) and to the north of the newly dualled A465 (which is allocated under Policy SW12).
- 2.6 The Heads of the Valleys Trail (NCN Route 46) borders the site.

Planning Context

- 2.7 The site is located within the settlement boundary of Merthyr Tydfil. There are no other policy designations or allocations associated with the site.

Environmental

Ground Conditions

- 2.8 The application site is located in an area identified by The Coal Authority as being at high risk from past coal mining activities.

Ecological Designations

- 2.9 The site is not subject to any statutory ecological designations. Furthermore, there are no internationally important designations within 10km of the site and no nationally important designations within 2km of the Site.
- 2.10 In regard to non-statutory designations there are five Sites of Importance for Nature Conservation (SINC) within 2km of the site. Although there is a lack of connectivity to the site with surrounding industrial landscape and dual carriageways acting as a buffer.

Habitats

- 2.11 EDP undertook an extended Phase 1 Habitat survey, followed by detailed surveys in respect of bats and badger, between February 2025 and July 2025.
- 2.12 The site is predominantly composed of hardstanding and ephemeral/short perennial vegetation, transitioning into areas of poor semi-improved grassland with scattered gorse scrub along the western embankment. Dense scrub is present on the southwestern and northeastern boundaries, featuring blackthorn and immature silver birch.
- 2.13 Hedgerows on the northern and northeastern edges are species-poor, with dominant species including dogwood, blackthorn, sycamore, and bramble.
- 2.14 No invasive species were recorded on-site, although desk study data identified Japanese rose within 0.1 km.

Species

- 2.15 Six built structures are located on the eastern side of the site, two of which supported confirmed summer day roosts for common pipistrelle bats following emergence surveys. The site offers limited foraging habitat for bats due to poor connectivity and light pollution. No suitable trees for roosting were identified.
- 2.16 No evidence of badger, dormouse, water vole, otter, amphibians, or reptiles was found, and these species are considered likely absent due to unsuitable habitat and poor connectivity. Scattered scrub and trees may support breeding birds.

Arboriculture

- 2.17 There are a number of trees within or neighbouring the site boundary. The submitted Tree Constraints Plan (EDP9069_d006b) identifies their categorisations and root protection areas. There are no Tree Protection Orders on the land.

Flood Risk

- 2.18 The Natural Resources Wales, Flood Map for Planning website, indicates the majority of the site to have a Zone 1 flood risk of surface water flooding. There is a small area of Zone 2 surface water flood risk within the existing site, close to the southeastern boundary.

Heritage

- 2.19 The site does not fall within a Conservation Area. However, it does fall within a Landscape of Outstanding Historic Interest and the existing buildings included within the northeastern corner of the site are also designated as a GGAT archaeological asset.

Planning history

- 2.20 Following a review of Merthyr Tydfil Council's online records, we have identified the following relevant planning history for the site:
- 1 An application (P/96/0224) to erect a two-storey building to accommodate hot food outlet at land adjacent to station house.
 - 2 An application (P/12/0273) to erect a ready-mix concrete plant. This was approved in May 2013.
- 2.21 We understand that both permissions were implemented.
- 2.22 The Planning Statement accompanying the above application notes that the site was occupied by a ready mixed concrete plant until 2007 but this ceased operation due to it becoming unviable. The 2012 application sought to reinstate this use with a modern mobile unit and a small ancillary messroom.
- 2.23 The lawful use of the site is therefore considered to be B2 (General Industry), albeit has now been vacant (and cleared) for a number of years.

3.0 **Proposed development**

- 3.1 This application seeks planning permission for a drive-thru restaurant (Use Class C3) to be operated by McDonald's. The description of development is as follows:
- "Demolition of existing buildings and development of a restaurant with drive-thru facility (Use Class A3) including access and cycle/footpath, servicing, car parking, hard and soft landscaping, advertisements and other associated works."*
- 3.2 The restaurant building will have a floorspace of 309sqm (GEA) and will be located adjacent to the western boundary of the site, with parking provided to its south and east. A dual drive-thru lane will wrap around the north of the restaurant.
- 3.3 There will be 32 car parking spaces, including two accessible bays, two with electric vehicle charging points and one grill bays for drive-thru customers. There would be 6 cycle parking spaces, comprising three Sheffield stands in front of the patio area.
- 3.4 Vehicular access to the site will be provided via an existing junction off Common Road. A new internal access road will be constructed to facilitate access and egress to the site which will provide direct access to the drive-thru lane and car parking area and is sufficiently sized to manage drive-thru queues on site.
- 3.5 Planting and soft landscaping, comprising turf, hedges and low-level shrubs, will be provided to soften the perimeter of the site. In addition, 33 trees will be planted through the site. An attenuation pond will be provided in the north western corner and some of the surface water from the site will be drained to and disposed of from this pond. The remaining surface water will be dealt with through bio-retention and permeable pavements. These will drain via channel drains.
- 3.6 The landscaped area to the north west of the site will also include a sensitively lit pedestrian and cycle path which will connect the site to National Cycle Route 46.
- 3.7 The proposed restaurant design will use a modern materials palette including a timber effect and dark grey cladding panel. More details are provided in the Design and Access Statement.
- 3.8 To the south east of the site, the existing house will be retained.

Advertisement

- 3.9 In addition to the above, this application also seeks advertisement consent for the installation of signage within the red line boundary of the site.
- 3.10 Signage on the building will comprise 1.0m high, white satin finished 'McDonald's' to the southern and northern elevations, and 1.575m yellow 'M' mounted on the eastern elevation above the entrance. Vertical 'collect' and 'pay' signage will be located on the bays as shown.
- 3.11 Totem and banner signage will also be incorporated within the wider site. A height restriction goal post will be located at the entrance to the Drive Thru and two order posts and associated canopies are to be sited towards the western boundary.

- 3.12 Full details on the location of the advertisements are outlined in Appendix 1 informed by the Proposed Site Advertisement Plan (reference: 13888_AEW_2685_0008A) and Building Elevations Advertisement Plan (reference: 13888_AEW_2685_0009). Specific measurements for all advertisements can be viewed in the supporting advertisement brochure (November 2024) submitted as part of this application.

Consultation

- 3.13 The applicant has undertaken pre-application consultation with Merthyr Tydfil Council, has engaged with local Members, and has undertaken a public engagement exercise. For further details on the pre-application engagement and wider community consultation undertaken, please refer to the accompanying Community Consultation Statement, prepared by Lichfields.
- 3.14 A summary of the pre application response is provided below.
- 3.15 The Council confirmed that the proposed development is located within the settlement boundary, and as such, the principle of development is acceptable subject to compliance with relevant planning policies and other material considerations. However, given the site's location outside designated town and local centres, the proposal will need to be supported by a town centre sequential assessment. While the 'need' test does not apply to Class A3 uses, it must be demonstrated that the development would not harm the vitality or viability of existing centres. This is considered in Section 5 of this Statement.
- 3.16 In terms of design and visual impact, the Council agreed that site is situated within a mixed-use commercial area, where buildings vary in scale and appearance. Although no elevational drawings were submitted at the pre-application stage, the Council acknowledged that McDonald's restaurants typically follow a standardised design. Nonetheless, detailed drawings, including sections, will be required to assess the relationship with adjacent buildings, particularly the Lidl store located at a higher level. Boundary treatments will also need careful consideration to minimise visual impacts and ensure compatibility with neighbouring uses, including the Council depot. The accompanying Landscape and Visual Appraisal in tandem with the elevational drawings provides this detail.
- 3.17 The Council noted that while the site is predominantly commercial, there are residential properties to the east and northeast. The proposed drive-thru use may intensify activity compared to the site's previous industrial use, particularly if operating hours extend into the night. Potential impacts from noise, light, and cooking odours will need to be addressed, and appropriate mitigation measures should be incorporated. The application is supported by a ventilation and extraction report which addresses these amenity matters, and confirms there will be no unacceptable impact on the adjacent residential uses.
- 3.18 Highway access is proposed via an existing adopted road referred to as Common Road. The Council's Engineering and Highways department reviewed the pre-application traffic note and provide a number of comments that required review and addressing in the final submission. These include modifications to the access to accommodate delivery vehicles and ensuring safe circulation for customers. These matters are directly addressed in the Transport Assessment that accompanies this application.

- 3.19 Ecological matters were also highlighted. A Preliminary Ecological Appraisal, GI Statement and a sensitive lighting strategy accompany this application, to demonstrate that the proposal accords with Planning Policy Wales Chapter 6 and Local Policy.

4.0 **Policy context**

4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.2 The statutory development plan for the site is:

- 1 The Merthyr Tydfil County Borough Council Local Development Plan; and,
- 2 Future Wales (The National Plan) which was published on 24 February 2021.

4.3 Other material considerations for the proposed development include:

- 1 Planning Policy Wales (Edition 12);
- 2 PPW Supporting Technical Advice Notes;
- 3 Merthyr Tydfil Guidance Note No.4 (Sustainable Design); and,
- 4 Merthyr Tydfil Guidance Note No.5 (Nature and Development).

4.4 The planning policy framework relevant to the proposed development is set out below.

Merthyr Tydfil Replacement Local Development Plan

4.5 The Merthyr Tydfil Replacement LDP was adopted on 29 January 2020 and covers the period from 2016 to 2031.

4.6 Lichfields considers that the LDP policies listed below are relevant to the proposed development.

- 1 SW4: Development is supported within settlement boundaries; outside these areas, only specific rural uses are permitted. Proposals must align with sustainability and placemaking principles.
- 2 SW9: Planning obligations will be sought for affordable housing, open space, and infrastructure not covered by CIL. Viability assessments may justify reduced contributions.
- 3 SW11: Development must be well-designed, inclusive, and sustainable, integrating green infrastructure and respecting local character. Proposals should promote accessibility, energy efficiency, and health.
- 4 SW12: Supports transport improvements and modal shift to sustainable travel.
- 5 CW1: Development must preserve or enhance historic assets including listed buildings, conservation areas, and archaeological sites. Heritage impact assessments are required for affected proposals.
- 6 EnW1: Development must largely maintain and enhance biodiversity.
- 7 EnW2: Development affecting protected sites or species must show no alternatives, outweighing benefits, and provide mitigation or compensation. SSSIs and protected habitats are strictly safeguarded.

- 8 EnW3: Regionally important ecological and geological sites must be protected and enhanced. Development must avoid or mitigate harm and support biodiversity resilience.
- 9 EnW4: Development must not cause unacceptable harm to air, water, soil, or public health. Mitigation and monitoring are required where impacts are identified.
- 10 EcW2: Employment sites are protected from non-employment uses unless they are unsuitable or surplus to market needs. Proposals must demonstrate economic benefit or regeneration potential.
- 11 EcW3: Ensures that retail development is directed to designated centres and proposals outside must demonstrate need and avoid harm to existing centres' vitality.
- 12 EcW6: Requires that proposals for retail development outside of designated centres must demonstrate a specific need that cannot be met within existing town or local centres. Additionally, the proposal must not cause unacceptable harm to the trade, turnover, vitality, or viability of those centres, either individually or cumulatively with other developments

Future Wales: The National Plan 2040

4.7 Future Wales provides the spatial development framework for Wales and it was published on 24 February 2021. Lichfields considers that the policies listed below are relevant to the proposed development:

- Policy 1: Where Wales will grow
- Policy 2: Shaping Urban Growth and Regeneration- Strategic Placemaking;
- Policy 6: Town Centre First;
- Policy 9: Resilient Ecological Networks and Green Infrastructure and,
- Policy 33: National Growth Area – Cardiff, Newport and the Valleys.

4.8 Future Wales requires a Town Centre First approach to commercial developments and the application of a sequential approach to inform the best location for qualifying development when proposed outside of defined centres (page 71).

Planning Policy Wales

4.9 Planning Policy Wales (PPW) is also a material consideration in determining planning applications. The most recent version, Edition 12, was published on 7 February 2024. The document provides the land use planning policies of Welsh Government. Lichfields considers that the chapters listed below are relevant to the proposed development:

- Chapter 2: Achieving wellbeing through placemaking;
- Chapter 3: Strategic and spatial choices;
- Chapter 4: Active and social places;
- Chapter 5: Productive and enterprising places; and,
- Chapter 6: Distinctive and Natural Places.

Technical Advice Notes

- 4.10 PPW is accompanied by a series of Technical Advice Notes (TANs) which provide detailed guidance on technical matters. TAN4: Retail and commercial development, TAN 12: Design, TAN 18: Transport, and TAN 7: Outdoor Advertisement Control are most relevant to the proposed development.

Advertisement Policy Context

- 4.11 The display of advertisements in Wales is regulated by the Town and Country Planning (Control of Advertisements) Regulations 1992. Regulation 4(1) states that the assessment of advertisement applications is confined to the issues of amenity and public safety.

Other material considerations

- 4.12 Planning Policy Wales (Edition 12, dated February 2024) is also a material consideration in the determination of the advertisement consents. It notes that “*there is a strong presumption against the granting of planning permission for developments, including advertisements, which damage the character or appearance of a conservation area or its setting to an unacceptable level.*” (para 6.1.15). However, as the site is not located within a Conservation Area, this is not applicable to the proposal.
- 4.13 Technical Advice Note (TAN) 7 was published in 1996 and it relates to outdoor advertisement control. It requires that proposals for outdoor advertisements are determined with consideration of their impact on amenity and public safety – aligning itself with the regulations.
- 4.14 Merthyr Tydfil’s Shopfront Design Guide (adopted 2013) provides some background context on the Council’s expectations for signage, albeit is tailored towards individual shopfronts rather than Business Parks.

Policy tests

- 4.15 In respect of the policy framework identified above, the planning application should be assessed against the policy tests and material considerations listed below:
- 1 Principle of development, including the principle of out-of-town centre restaurant.
 - 2 Parking, access and highway safety;
 - 3 Flood risk and drainage;
 - 4 Design;
 - 5 Trees;
 - 6 Ecology;
 - 7 Landscape; and,
 - 8 Amenity
- 4.16 These matters are considered in the following sections.

5.0 **Town centres first sequential assessment**

- 5.1 The proposed development comprises a restaurant with drive-thru facility (Use Class A3) extending to 309sqm (GEA) to be operated by McDonald's. It is located outside of a designated retail centre.

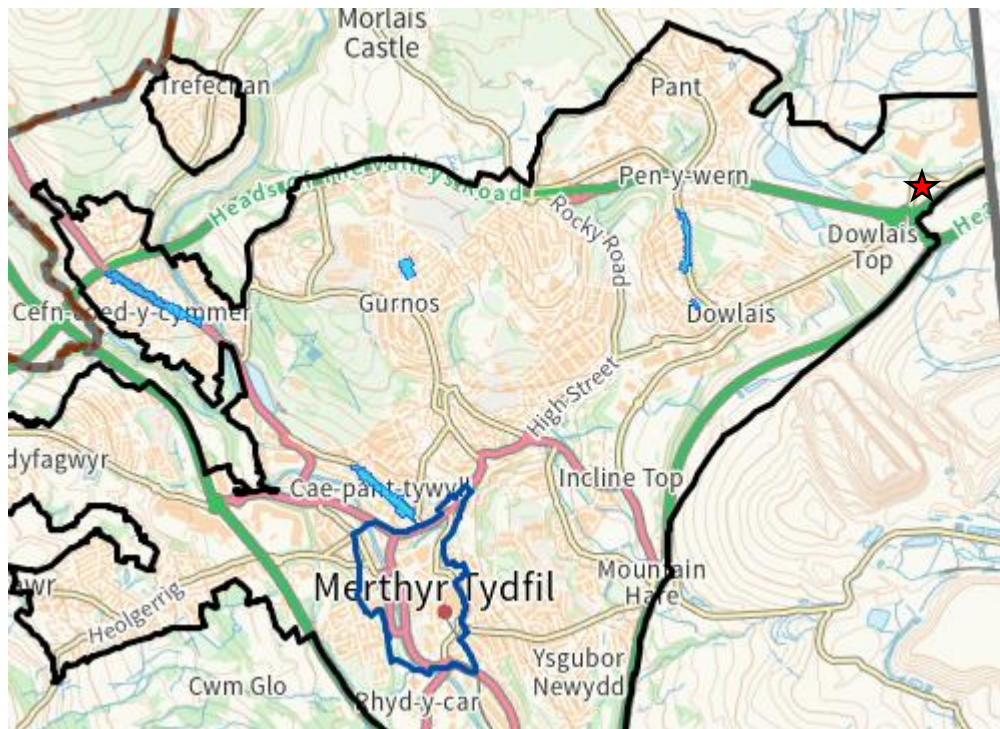
Policy context

- 5.2 Policy 6 of Future Wales mandates a Town Centre First approach to the provision of new retail and complementary uses, requiring a sequential approach to assessing the best location for relevant development, when proposed outside of defined centres (page 71).
- 5.3 TAN4 (Retail and Commercial Developments) and PPW provide further guidance on the Town Centres First approach, with paragraph 4.3.18 of PPW confirming that new development should be directed to retail and commercial centres, ahead of edge of centre locations, before out of centre locations are considered.
- 5.4 This sequential approach is described in paragraph 7.1 of TAN4. It is designed to ensure that the most suitable locations are considered in order of priority, respecting the retail hierarchy.
- 5.5 Paragraph 4.3.21 of the PPW confirms that A3 uses are subject to the Town Centres First policy. However, PPW also clarifies, at paragraph 4.3.1 that a Retail Needs Assessment is not required for Class A3 uses stating that "*Needs tests only apply to retail uses and do not apply to other uses which are complementary to town and city centres*" (page 66). Equally, PPW limits the need for impact assessments to retail uses only and specifically those above 2,500sqm of floorspace (page 68).
- 5.6 Policy EcW3 (Retail Hierarchy) of the Merthyr Tydfil LDP states that the preferred location for new retail, commercial, leisure and other complementary uses will be Merthyr Tydfil Town Centre followed by the eight local centres. Where it can be demonstrated that no suitable sites exist within these areas, then first edge of centre and then out-of-centre sites can be considered (subject to the proposal avoiding harm to town/local centre vitality and viability).
- 5.7 In accordance with the provisions of Future Wales, PPW and Merthyr Tydfil LDP, a Town Centres First sequential assessment has been undertaken to assess whether there are sequentially preferable sites in town centre or edge of centre locations to the application site.

Sequential Assessment Methodology

- 5.8 Figure 5.2 is an extract from the Merthyr Tydfil Proposals Map which shows the location of the main Town Centre (outlined in dark blue) and Local Centres (outlined in light blue), within proximity to the proposed development site. The application site is indicated on the map with a red star.

Figure 5.2: Extract showing Central Shopping Areas and Neighbourhood Centres in South Monmouthshire



Source: Merthyr Tydfil Proposals Map

- 5.9 On the basis of the above, the Town Centres First sequential assessment has considered the available sites and land within the following Town Centre and Local Centres:
- 1 Merthyr Town Centre;
 - 2 Brecon Road Local Centre;
 - 3 Gurnos Local Centre; and,
 - 4 Dowlais Local Centre.
- 5.10 As set out in the Economic Operator Statement, the eastern suburbs of Merthyr Tydfil are underserved whilst the two existing McDonalds drive thru restaurants in the western suburbs are trading strongly, despite having sub-optimal layouts and parking provision. Therefore, the above search catchment is considered comprehensive and robust given the site's location in the northeast and the existing McDonalds existing offering to the west.
- 5.11 The proposed restaurant with associated surface level car parking and drive-thru responds to the specific business model requirements of McDonald's in this location. The drive-thru elements of the proposal are integral to the viability of the operator's business model in order to capitalise upon passing trade from the A465. As such, in undertaking the sequential approach, consideration has been given to whether the potential alternative sites could accommodate the proposed development in its entirety, as the components of the proposed development do not need to be disaggregated for this purpose.
- 5.12 In respect of identifying sites to include in sequential assessments, TAN4 confirms that "developers and retailers should be flexible and innovative about the format, design and scale of proposed development" (paragraph 7.5). This guidance is consistent with the

judgment of the Supreme Court in *Tesco Stores Ltd v Dundee City Council* (21 March 2012)¹ which is binding to local planning authorities across the UK confirmed that the understanding of what is suitable (in the context of the sequential test) is not a matter of planning judgement, but of legal interpretation. As such, if a developer of an out-of-centre has demonstrated a degree of flexibility in assessing whether they are available and suitable, the sequential test is satisfied.

5.13 In addition, the Inspector considering an appeal against a refusal of planning permission for a drive-thru restaurant at Treloggan Road, Newquay stated *“it is difficult to envisage how a developer could be flexible in respect of the format of a drive through restaurant. Unlike a conventional restaurant, which could easily be accommodated on any of the identified sites, a drive through by definition requires vehicular access and circulation through or around the building.”*²

5.14 While the Newquay appeal decision was made in England, it highlights the operational constraints of drive-thru developments—specifically the need for vehicular access and circulation. These practical considerations apply equally in Wales and support the argument that such formats require specific site characteristics, relevant to the sequential test

McDonald’s Minimum unite size and site size.

- 5.15 The specific site requirements in order to accommodate the proposed development are;
- 1 A broadly level site with a minimum size of 0.3ha, configured in such a way as to allow for the erection of a single storey building, as well as a ‘drive-thru’ lane, car parking provision and associated vehicular circulation;
 - 2 Safe and efficient access onto the strategic road network; and,
 - 3 Sufficient prominence from the nearest road to ensure visibility to passing custom.

McDonald’s Commercial Requirement

5.16 In undertaking a Town Centres First sequential assessment, it is important to consider, from the outset, the commercial need that the proposed development is seeking to meet.

5.17 In this case, McDonald’s has a requirement for a new drive-thru restaurant to serve the catchment area of north east Merthyr Tydfil which would also serve commuters travelling through South East Wales and along the upgraded Heads of Valleys Road. The subject site is considered to be ideally located, immediately north of the upgrade works at Dowlais Junction.

5.18 McDonald’s does not consider that the retail centres within Merthyr Tydfil would provide sufficient footfall to make a restaurant viable, without the provision of a drive-thru to capture additional custom.

5.19 This commercial requirement takes into account McDonald’s existing network of restaurants in Merthyr Tydfil (shown on Figure 5.1 below) which include:

¹ *Tesco Stores Ltd v Dundee City Council* [2012] UKSC 13, Supreme Court Judgment dated 21 March 2012.

² Planning Inspectorate Appeal Decision Ref: APP/D0840/W/24/3351090, dated 24 March 2025, concerning a proposal at Prow Park Business Village, Treloggan Industrial Estate, Newquay, Cornwall TR7 2SX

- 1 Cyfartha Retail Park (drive-thru); and,
- 2 Merthyr Tydfil Leisure Village (drive-thru)

Figure 5.1 Existing McDonald's Coverage (site location indicated by red cross)



- 5.20 Figure 5.1 demonstrates that the west of Merthyr Tydfil is served by conveniently accessible McDonald's restaurant, both of which operate as drive thru format restaurants. However, there is a clear lack in the north and east of the authority area.
- 5.21 Further detail on the site relationship with existing McDonald's restaurants, and the analytical modelling adopted by the chain when considering the need for new locations is contained within the Economic Operator Statement.

Analysis of Sequential Opportunities

- 5.22 A review of the Development Plan has led to the identification of the following potential alternative sites located within, or on the edge of existing centres and assesses their potential to accommodate a drive-thru restaurant. A site visit of these locations was undertaken on Wednesday 2 April 2025.

Merthyr Tydfil Town Centre

- 5.23 At the time of our site visit, there were c.28 vacant units in the Town Centre. However, in general, these units are:
- 1 Too small in size (including consideration given to the amalgamation of units);
 - 2 Have an implementable planning permission associated with the land or are under offer;
 - 3 Unable to accommodate a drive-thru lane or surface area parking; and,

4 Unable to meet the commercial requirements of McDonald's.

5.24 Despite the above, two sites warranted further consideration.

Merthyr Tydfil College car park.

5.25 The site comprises a car park for Merthyr Tydfil College, with an area of 0.3ha. whilst it is of suitable size to accommodate the proposals, the car park is operational, and we understand it is utilised by the College. It is therefore not available from a commercial perspective. The loss of car parking would also likely have an unacceptable planning impact, as well as there being concerns over the highways impact. Furthermore, the majority of the land is in flood zone 3.

5.26 For these reasons, the site is not considered sequentially preferable.

Figure 5.2 The College Merthyr Tydfil Car Park



Source: Lichfields

Former Labour Exchange, Penydarren Road

5.27 The site comprises 0.66ha scrubland, located within a designated Conservation Area.

5.28 The site has a long planning history for residential development. This has most recently included an approved planning permission (P/16/0096) for the construction of 12

dwellings and 8 flats. We understand works commenced but were subsequently halted with the 12 houses which were to front the Promenade having been abandoned due to significant difficulties encountered by the developer when excavating and retaining the middle and northern part of the site.

5.29 This suggests the site would not be viable or suitable for the proposed McDonald's development. Furthermore, access to the site for cars would be via a small residential street, unlikely to be suitable for a drive thru restaurant. The site is also highly sensitive from a heritage perspective.

5.30 For these reasons, the site is not considered sequentially preferable.

Figure 5.3 Former Labour Exchange



Source: Lichfields

Brecon Road Local Centre

5.31 Brecon Road Local Centre is located just north of Merthyr Tydfil Town Centre. It comprises residential properties, small shops, and community facilities, and eventually leads to Cyfarthfa Park.

5.32 Based on our site visit, there are c. 8 vacant units within the Local Centre. However, in general, these units are:

- 1 Too small in size (including consideration given to the amalgamation of units);
- 2 Unable to accommodate a drive-thru lane or surface area parking; and,
- 3 Unable to meet the commercial requirements of McDonald's.

5.33 There was one parcel of scrubland within the local centre that did warrant further consideration (shown below). However, it was quickly discounted due to the site's size (0.17 acres/0.07ha).

- 5.34 In addition to its limited size, the site's proximity to surrounding residential properties could result in unacceptable impacts on amenity.
- 5.35 Furthermore, the site is subject to an extant planning permission for two detached dwellings (Ref: P/23/0141), which further constrains its availability for alternative use.
- 5.36 Therefore, whilst the site may be in a sequentially preferable location it does not represent a suitable alternative site.

Figure 5.4 Land Between 99 - 107 Brecon Road Merthyr Tydfil



5.37 Source: Google Maps

Gurnos Local Centre

- 5.38 Gurnos Local Centre is a small, purpose-built local centre which serves the immediate community. The centre comprises 12 units and, at the time of our site visit, none of these were vacant.
- 5.39 The surrounding areas predominately comprise of dwellings and/or community facilities, with no available brownfield land to redevelop within 300 metres of the Local Centre. Therefore, this location would not be able to accommodate the proposed development.

Dowlais Local Centre (including Victora Street)

- 5.40 Dowlais Local Centre is a small, purpose-built local centre which serves the community of Dowlais. The centre comprises 25 units split across two designated areas.

5.41 Based on our site visit, there are approximately 5 vacant units within the Local Centre. None of these present viable options due to their size and surrounding uses.

5.42 The surrounding areas predominately comprise of dwellings and/or community facilities, with no available brownfield land to redevelop within 300 metres of the Local Centre.

Summary

5.43 McDonald's has specific locational requirements for a drive-thru restaurant that can serve the eastern suburbs of Merthyr Tydfil whilst also being well placed to capture passing trade along the newly upgraded A465. Its business model is such that it requires strong levels of passing trade and an appropriate catchment population. The site at Penygarnddu Business Park fulfils this requirement and meets an identified need, not just identified by the business, but also expressed by residents through the public consultation.

5.44 There are no sequentially preferable development sites within the Central Shopping Areas or Local Centres identified through the Town Centres First assessment. Whilst a small number of potential alternative sites were identified, none are suitable and/or available to accommodate the proposed development.

5.45 On this basis, it is concluded that the proposed development meets the town centres first sequential assessment requirements of Future Wales, PPW and the Merthyr Tydfil LDP.

6.0 **Planning policy analysis**

- 6.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act, this section assesses the proposals against the planning policy identified in Section 4.0.

Principle of development

- 6.2 The site comprises of brownfield land and is located within the defined settlement boundary of Merthyr Tydfil. LDP Policy SW4 seeks to guide development within settlement boundaries and also aims to maximise the use of previously development land. PPW also notes that within settlement boundaries, previously developed land should generally be considered suitable for appropriate development (paragraph 3.55) and that local authorities should work with landowners to enable such land to be brought forward for development (paragraph 3.56).
- 6.3 As a result of the above, the principle of the development is considered acceptable and encouraged by policy.

Principle of out-of-centre restaurant

- 6.4 As set out in Section 5 of this planning statement, Future Wales and Policy EcW3 of the Merthyr Tydfil LDP adopt a town-centres-first approach to the location of retail and complementary uses.
- 6.5 Due to the locational and operational requirements and lack of suitable available sites in sequentially preferable locations, the proposed out of centre location is acceptable in policy terms.
- 6.6 LDP Policy EcW3 also requests a needs assessment for 'retail leisure and complementary uses' outside of a designated town centre. However, due to the direct conflicts with PPW, we do not consider that the requirement remains relevant. This position was agreed with the Officers as part of the pre application process. As such the principle of the proposed use is acceptable.

Loss of potential B use class development

- 6.7 The adopted LDP does not identify the site as a Protected Employment Site under Policy EcW2. However, the policy also affords some protection to employment land and premises outside the identified existing employment sites, requiring development proposals for alternative uses to demonstrate that the existing use is inappropriate or that the site or premises is no longer viable.
- 6.8 The accompanying Employment Land Statement (ELS) has reviewed the status of employment land supply for Merthyr Tydfil. It confirms that there is no quantitative justification to protect the application site for employment uses due to:
- 1 The LDP allowing for an oversupply of 16.19ha of employment land;
 - 2 That take-up of allocated employment land for the first four years (up to March 2024) totalled 0ha;
 - 3 The application site is small, comprising of just 0.42ha of land; and,

4 The application site is neither in active employment use nor included within Merthyr Tydfil's identified supply of 30.65ha of employment land.

6.9 As a result, granting planning permission for the delivery of a drive-thru restaurant on the site would not result in any loss of existing employment land or premises and would leave the Council's demand-supply balance unchanged.

6.10 Despite marketing efforts since Q4 2020, including interest from alternative retailers, the site has attracted no viable offers, as confirmed in the accompanying marketing letter (appendix 2) from the landowner. This prolonged vacancy highlights the site's limited commercial appeal in its current designation.

6.11 This evidence demonstrates that there is no justifiable basis by which a development proposal that will generate employment would be refused on economic/employment land grounds. The proposed development will create 80 FTE operational jobs and would therefore be consistent with Policy EcW2 which supports the repurposing of underutilised employment sites where the existing use is inappropriate, or the site or premises is no longer viable.

Principle Summary

6.12 The proposed development of a McDonald's drive-thru restaurant aligns with LDP Policy SW4. It is considered to be an appropriate use which is distinct from High Street restaurants, and supported by a Town Centre Sequential Assessment confirming no sequentially preferable locations. Furthermore, there is no planning policy reason to protect the site for a B Class employment use.

6.13 Overall, the development is compliant with relevant national and local planning policies, supports economic growth, and makes beneficial use of a long-term vacant brownfield site.

Highways and parking

6.14 This application is accompanied by a Transport Assessment (TA), prepared by ADL Traffic, which considers the proposal against the requirements of LDP Policies SW11 and SW12. The Assessment considers access to the site via private vehicle, public transport, walking and cycling, as well as the impact of the proposed development on the local highway network and car parking provision.

6.15 In respect of the volume of traffic, the TA identifies the proposed development, and its associated 'additional traffic' is unlikely to have a material impact on the operation of the network. This is because only 57% of customers will be additional trips on a weekday (which decreases to 42% on a Saturday) with the remaining 43% (or 58% on a Saturday) being either existing trips or shared trips.

6.16 The TA also identifies that the maximum drive-thru demand would be 13 vehicles and that the proposed drive-thru would have capacity for 20 vehicles. Similarly, the parking demand would be 25 spaces on a Saturday (dropping to 22 on a Friday) therefore the proposed car parking provision of 32 spaces is more than sufficient.

6.17 The proposal includes improvements to active travel infrastructure via a pedestrian/cycle path which will connect to Cycle Route 46. Sensitive lighting and bespoke landscaping will

be provided in this location to deliver a high-quality public realm. This is considered an improvement to active travel provisions in support of policy SW11 (having regard to the drive-thru nature of the development).

- 6.18 The accompanying Delivery Management Plan (DMP) provides a delivery strategy, aligned to the existing McDonald's network, and includes site specific measures that would be implemented to manage deliveries. The DMP includes mitigation measures to reduce the proposed development's impact on the local road network.
- 6.19 In summary, the transport aspects of the development have been carefully considered and designed in accordance with the relevant LDP policies. The scheme delivers a balanced approach to access and mobility, supporting both operational needs and wider transport objectives.

Flood risk

- 6.20 The site lies largely outside any designated floodplain and is not at risk from tidal or fluvial flooding. There is, however, a small area Zone 2 surface water flood risk within the site, close to the south eastern boundary.
- 6.21 The accompanying Drainage Statement, prepared by Glanville, outlines the flood mitigation proposed as part of this development. It comprises:
- 1 **Raised Finished Floor Levels (FFL):** Maintained at 150mm above surrounding ground to mitigate pluvial flood risk;
 - 2 **Sustainable Drainage Systems (SuDS):** Designed for a 1 in 100-year storm event plus climate change, reducing surface water runoff and sewer flooding risk;
 - 3 **Flow Control Devices:** Installed to manage peak discharge rates;
 - 4 **Safe Access and Egress:** Both pedestrian and vehicular routes remain dry during extreme events; and,
 - 5 **Dry Parking Areas:** All parking areas will remain outside flood risk areas.
- 6.22 No flood emergency plan or flood compensation measures are required, as the site is not within a floodplain and no new flood risks are introduced. Residual flood risks from all sources (fluvial, pluvial, groundwater, sewer, and artificial sources) are assessed as low or none, with no additional mitigation required beyond the proposed design.
- 6.23 The development has been assessed in accordance with Technical Advice Note 15 (TAN15) (2021, updated 2025), which sets out the Welsh Government's policy on development and flood risk. TAN15 requires that new development avoids areas of high flood risk and incorporates appropriate mitigation where necessary. The proposal complies with TAN15 by being located outside flood risk zones and incorporating sustainable drainage and flood resilience measures.
- 6.24 The proposed development represents a sustainable and appropriate reuse of previously developed land, with no adverse impact on flood risk either on-site or to surrounding areas. The development is therefore in accordance with Policy EnW4.

Drainage

- 6.25 The development's surface water drainage strategy follows the statutory standards for sustainable drainage systems. Infiltration is unlikely to be feasible at this site and therefore runoff is discharged into the existing on-site surface water drainage system. The proposed discharge rate is restricted to the existing 1 in 1-year greenfield runoff rate. The sustainable surface water drainage system is designed to accommodate a 1:100-year event plus the appropriate climate change allowance for this site without flooding.
- 6.26 A SuDS maintenance schedule has been provided within the accompanying Drainage Maintenance Plan to demonstrate the proposed works.
- 6.27 This approach is entirely consistent with LDP policy SW11 and the detail of the drainage design will be subject to Full SAB approval.

Design

- 6.28 The design and layout of the proposed development has been considered with respect to LDP Policy SW11.
- 6.29 The design of the proposed restaurant is of a high quality, incorporating a mix of dark grey and timber appearance cladding, i.e., materials and colours that reflect and complement the character and appearance of the surrounding commercial area and the site's context within the Business Park. It is considered that the scale, siting and massing of the proposed building are compatible with existing uses and would also significantly improve the existing visual appearance of the site. Further details on design are provided within the submitted Design and Access Statement.

Advertisement and Signage

- 6.30 This application seeks consent for signage directly related to the operations within the building. There are no specific policies relating to applications for advertisement consent within the Merthyr Tydfil Replacement Local Development Plan 2016-2031. Therefore, Technical Advice Note (TAN) 7: Outdoor Advertisement Control, specifically Section 6 should be considered. This notes that the display of outdoor advertisements can only be controlled in the interests of amenity and public safety.
- 6.31 Signage on the building will comprise 1.0m high, white satin finished 'McDonald's' to the southern and northern elevations, and 1.575m yellow 'M' mounted on the eastern elevation above the entrance. Vertical 'collect' and 'pay' signage will be located on the bays as shown.
- 6.32 Totem and banner signage will also be incorporated within the wider site. A height restriction goal post will be located at the entrance to the Drive Thru and two order posts and associated canopies are to be sited towards the western boundary.

Amenity

- 6.33 The proposed signage is appropriately sized, well-designed, and suitably located within the Business Park. Its scale and style are consistent with existing signage, such as at Lidl and elsewhere in the park.

- 6.34 Although there is one residential property nearby, the signage is positioned so that it faces away from the dwelling, with limited visibility from its windows. As a result, the proposal will not negatively impact visual amenity. Given its alignment with existing signage in the Business Park, and the surrounding context, the proposal is considered acceptable and will not harm the character or amenity of the area.

Highways and public safety

- 6.35 The proposed signs are simple in design and are fixed to the building or set within the boundary of the development. The proposed signage locations are set back a safe distance from the adjoining transport network. The signage would also be static, with low levels of illumination.
- 6.36 The siting, scale and design of the new signage would not, therefore, have an adverse impact upon highway or public safety, as per the existing signage at the Business Park, including Totems and illuminated signage.
- 6.37 The proposed signage is appropriate in its context given its location within an existing Business Park. The signage reflects the style of the other signage within the Business Park. The proposals are not considered to have any impact upon highway or public safety, and there are no conflicts with the statutory development plan, specifically Policy T5.

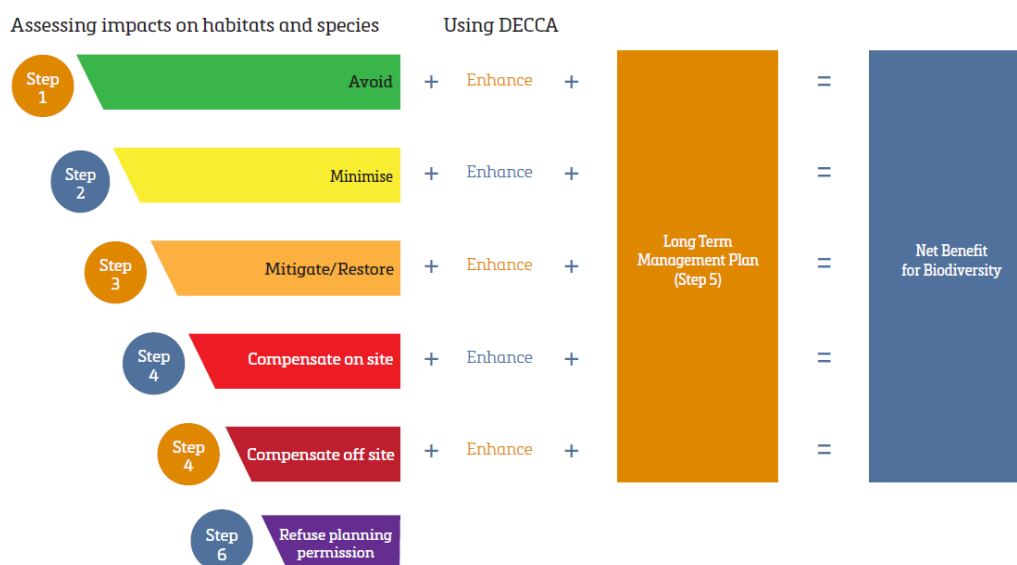
Trees

- 6.38 PPW states at paragraph 6.4.42 that any trees lost as a result of development should be replanted at a ratio of 3 to 1 and for woodland areas to be replaced at a ratio of 1,600 stems per ha. PPW also requires that trees are replaced with an equivalent to the quality, environmental and ecological importance of the trees lost. The preference is for these to be planted onsite or immediately adjacent to the site.
- 6.39 The accompanying Arboricultural Method Statement (AMS) confirms that the proposed development will require the removal of ten individual trees (one of which is category B the rest category C) and 0.0104ha of category B/C tree group. In accordance with PPW, the proposal includes the planting of 33 new trees and 41 replacement whips.
- 6.40 As such, it is considered that the proposal accords with PPW in respect of replacement tree planting.

Ecology

- 6.41 In respect of maintaining and enhancing biodiversity, Figure 12 in PPW sets out the step-wise approach that must be undertaken to the protection of habitats and species (shown in Figure 6.1). It sets out the approach to first avoiding harm to biodiversity, then being minimised, mitigated for, and as a last resort being compensated for on site, and then off site.

Figure 6.1 Summary of the step-wise approach



Source: Figure 12 of PPW

- 6.42 In accordance with the requirements of PPW, this application is accompanied by a GI Statement and Plan which demonstrates a Net Benefit to Biodiversity which has followed the Step-Wise Approach.
- 6.43 An Ecological Appraisal prepared by EDP accompanies this application. The Appraisal concludes that the dominant habitat at the site is hard standing and ephemeral/short perennial vegetation.
- 6.44 A Preliminary Roost Assessment (PRA) and Ground Level Tree Assessment (GLTA) were undertaken to assess the potential for roosting bats within buildings and mature trees on site. The GLTA confirmed that no trees exhibited features suitable for bat roosting, and no further tree assessments were required. The PRA identified three buildings with potential roosting features: buildings B2 and B3 (shown in figure 6.2 below) were assessed as having low suitability, while building B4 had moderate suitability.

Figure 6.2 EDP Building Assignment for Surveys



Source: EDP Ecology Appraisal

6.45 Dusk emergence surveys confirmed the presence of common pipistrelle roosts in buildings B2 and B4, although only single individuals or low numbers of bats were recorded. No roosting activity was observed in buildings B1, B5, or B6. Bat activity across the site was generally low, with limited foraging and commuting behaviour recorded, primarily involving common and soprano pipistrelles. The site's hardstanding and industrial surroundings, including adjacent lighting and road infrastructure, further limit its value to the local bat assemblage. Mitigation measures, such as bat boxes, will be incorporated into the development to ensure protection and enhancement of bat habitats where necessary.

6.46 EDP has provided input throughout an iterative design process and so the development layout reflects some important measures to avoid, mitigate and compensate for ecological impacts, as well as other measures to provide long-term ecological enhancements, as described in the Appraisal.

Ecological mitigation measures

6.47 To avoid ecological impacts by design, the proposed development incorporates the retention of existing habitats, particularly trees and hedgerows located around the peripheries of the site. These features are embedded within the approved site layout, ensuring that future detailed designs align with habitat preservation principles.

6.48 During construction, impacts will be minimised through the implementation of sensitive operational methods. These include controlling working hours, suppressing noise, vibration, and dust, managing surface water and chemical storage, eradicating invasive species, and applying sensitive lighting strategies. These measures will be secured through a Construction Environmental Management Plan (CEMP).

- 6.49 Protection of retained habitats will be ensured through the establishment of development exclusion zones, marked by fencing and signage. This will be supported by an Arboricultural Method Statement (AMS) and an Ecological Construction Method Statement (ECMS), both secured via planning conditions.
- 6.50 To safeguard protected species, a range of measures will be implemented prior to and during habitat clearance. These include avoiding the trapping of animals in excavations, timing works to avoid breeding seasons, phased vegetation clearance, maintaining dispersal routes, and supervised destructive searches. These actions will be overseen by an Ecological Clerk of Works (ECoW) and detailed within the ECMS.
- 6.51 To mitigate habitat loss and deliver biodiversity net gain, the development will include habitat enhancement and creation measures. These comprise ornamental shrub and tree planting along the north-western and south-western boundaries, formal hedgerow planting on the south-eastern boundary, and the creation of a green open space with an attenuation basin in the eastern part of the site. The basin will feature aquatic and marginal planting, native structure planting, species-rich grassland, and bulb planting to maximise biodiversity. Additional tree and hedgerow planting will be provided along the north-eastern boundary. These enhancements are embedded in the approved site layout and planting plans, with delivery secured through a Landscape and Ecological Management Plan (LEMP) which accompanies this application.
- 6.52 Further ecological features include the installation of six bird/bat boxes (locations to be agreed with NRW prior to commencement) on retained trees or integrated into built structures, and a sensitive lighting strategy to avoid disturbance to nocturnal species, particularly bats.
- 6.53 Post-construction, long-term habitat management will be undertaken to ensure the enhancement and establishment of retained and newly created habitats. Monitoring and maintenance will be carried out to achieve target ecological conditions. Species-specific features, such as bat and bird boxes, will be maintained or replaced as necessary, with all ongoing management secured through the LEMP.

Net Benefit Biodiversity

- 6.54 The proposed development will require the removal of some existing tree stock and scrub within the site boundary, resulting in a degree of impact on the current GI. However, the site is of limited ecological value in its present state, characterised by a neglected condition and offering minimal connectivity due to its enclosed nature.
- 6.55 On balance, the proposed GI and Biodiversity Strategy (see Appendix EDP 1 of the GI statement for the detailed planting plan) will deliver a net gain in biodiversity. This will be achieved through the retention and long-term management of viable, maturing trees, alongside significant compensatory planting. These measures will enhance the ecological value of the site and secure the future of key GI assets.
- 6.56 Where vegetation loss is unavoidable, it will be offset by the introduction of more diverse habitat features, including a hedge bank, permanent pond, individual tree planting, and a new GI framework that establishes connectivity across the site from the north-west to the south-west. The proposed SuDS area will serve multiple functions, supporting both biodiversity and visual amenity, while improving ecological connectivity.

- 6.57 Overall, the assessments demonstrate compliance with PPW and Policies EnW1, EnW2 and EnW3 of the Merthyr Tydfil LDP.

Landscape

- 6.58 The application is accompanied by a Landscape and Visual Appraisal (LVA) which considers the impact of the proposed development on the surrounding landscape and identifies recommendations for mitigation, where required.
- 6.59 The LVA confirms that the character of the area is largely defined by its uses, of which many detractors are found, including the road network, wind turbines, large industrial sheds, electricity pylons and large street lighting columns. These desensitise the site to change, particularly when considering the commercial development proposed.
- 6.60 The site is extremely well contained, particularly to the northeast, given the level change between the site and Lidl. Further north, industrial units and vegetation forms the backdrop of the view. To the south, the activity on the Council owned compound below the site is expected to be in temporary use but the longer-term plans for this site are unknown therefore the southern boundary of the proposed development aims to create a suitable separation from the compound and the road network beyond.
- 6.61 The proposals contain mitigation measures to integrate the development into the existing fabric of the site. Included in this is a new link to the national cycle network which will help integrate the development into the existing fabric of the site.
- 6.62 In terms of soft landscaping measures, the application is also accompanied by Soft and Hard Landscaping Plans and a Green Infrastructure Statement which show the extent of new ecological and landscaping features proposed to be provided. The proposed development will increase the soft landscaping around the site and, where possible, introduce green buffers and soft edges to the built form, further mitigating any views of the development. This includes providing relief to the retained residential unit to the south east,
- 6.63 The LVA concludes that the development has been sensitively designed and placed to integrate into the local context and that there is no 'in principle', landscape policy or visual impact reason as to why the site should not be developed for this use. The development is therefore compliant with Policy SW11 part 3.

Amenity

- 6.64 Policy EnW4 states that development is required to demonstrate it will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment.
- 6.65 Due to the site's location on the boundary of an industrial estate, and proximity to the Heads of the Valley Road, it is not considered that the proposal would have any detrimental impact on the amenity of neighbouring occupiers, specifically 183 Station House, in respect of matters such as lighting, noise or air quality. The restaurant is set away from the nearest residential receptors, and the odour control assessment confirms no adverse effects, subject to the embedded mitigation within the design. Furthermore, the proposal is likely to be less impactful use than past industrial uses.

6.66 The proposal demonstrates compliance with Policy SW11 point 3 and Policy EnW4.

7.0 Other material considerations

Economic Impacts

7.1 The proposed development of a new McDonald's restaurant at Common Road will provide a range of economic benefits:

- 1 Support 105 direct FTE construction jobs, as well as supporting a further 125 indirect FTE jobs during the construction phase;
- 2 Generate an additional £10.8 million of Gross Value Added during construction;
- 3 Create 105 direct headcount jobs (80 direct FTE jobs) on-site, once the proposals are completed and operational. This could support a further 45 indirect and induced FTE jobs in the wider region;
- 4 Generate £2.0 million of additional GVA per annum through direct operational employment; and,
- 5 Deliver an uplift in business rates revenue in the order of £58,000 per annum – a proportion of which would be retained locally.

7.2 McDonald's employs around 180,000 people across the UK, with a mix of all ages and life stages. People are at the heart of the business and, as a responsible and proud employer, McDonald's is committed to investing in them. To ensure the needs of all staff are met, and so attract and retain the best talent, the range of employment options has been expanded with the Guaranteed Minimum Hours Contracts (GMHC) rolled out to all UK restaurants.

7.3 In the workplace, flexibility, opportunity, equality and development are promoted, and over 85% of McDonald's employees have said that they love the flexibility their job offers them. 90% of Business Managers started as Crew Members and 33% of the Executive team started their career in one of their restaurants. Each year McDonald's invest £43million in training to develop its people.

7.4 Further details of the economic benefits of the proposed development are discussed in the accompanying Economic Operator Statement.

7.5 The Merthyr Tydfil LDP supports sustainable economic growth and is the focus for many of its objectives (12 – 18). The key points detailed in paragraph 6.11 clearly demonstrate compliance with these objectives.

Environmental sustainability

7.6 The scale of McDonald's business represents an opportunity to have a positive impact on some of the biggest challenges facing the world today. The threat of climate change is one such challenge and McDonald's is proud of the investment it has made to reduce its carbon footprint in the UK.

7.7 McDonald's was the first restaurant chain to set science-based greenhouse gas reduction targets at a global level. Working with all franchisees, its aim is to reduce greenhouse gas emissions related to all restaurants and offices by 36% by 2030. Additionally, McDonald's is committed to a 31% reduction in emissions intensity (per metric tonne of food and packaging) across the supply chain by 2030.

7.8 To meet these targets, McDonald's buy 100% renewable electricity and have invested in long term partnership agreements to develop the renewable energy infrastructure in the UK. The absence of on-site fossil fuel use, together with McDonald's electricity procurement agreements, eliminates the production of greenhouse gases from on-site operations. In recognition of global warming potential (GWP) associated with refrigeration gases, McDonald's has moved to the latest reduced GWP air conditioning refrigerants ahead of any legislation in this regard.

7.9 The first McDonald's restaurant built to the UKGBC net-zero emissions standard opened in 2021 in Market Drayton. McDonald's ambition is to reach net zero emissions in restaurants and offices by 2030, and its overall goal is to reach net zero emissions across the entire business and value chain in the UK and Ireland by 2040.

Waste and use of recycled material in construction

7.10 McDonald's is challenging itself to reduce carbon emissions in construction and use, and work with its suppliers to find solutions that will set high standards for the industry. Building materials are sourced locally where possible and carbon-intensive materials have been replaced with alternatives made with recycled car tyres, plastic bottles, and white goods. This includes the following:

- 1 Restaurant timber effect cladding panels: 47% recycled content;
- 2 Restaurant dark grey cladding panels: 47% recycled content;
- 3 Corral grey cladding panels: Recycled IT equipment; and,
- 4 Plant parapet: Recycled plastic.

7.11 Materials for the building are selected to provide the required aesthetics combined with maximum durability and robustness. The requirement for replacement, maintenance and repair will be minimal during the building lifecycles, thus providing a good low level of energy input over the whole lifecycle. Many of the materials used in the construction of the building are recyclable at the end of life, including:

- 1 The grey cladding panels;
- 2 The corral, steel and rubber seals from the security doors;
- 3 Restaurant cladding panels;
- 4 Timber and aluminium window and door frames; and,
- 5 The black cladding panels to the plant parapet.

7.12 Furniture will be sourced from recycled or certified materials and designed to be recycled or reused at end of life, as part of the McDonald's Plan for Change.

The restaurant building

7.13 The design of the new building has been directly influenced by sustainability and the standard practices to enable the reduction in its carbon footprint. Approximately, 90% of new restaurants are built using modular construction techniques, which use considerably less energy, inclusive of the reduction of the total number of deliveries to site during the build. Modular construction takes place in a controlled environment, which allows a highly

monitored and efficient process, where leftover materials can be used in future projects and ultimately reduce the general building waste. The construction time is also reduced, minimising the potential disruption to neighbours.

7.14 In addition to the above, the walls of the building are insulated using British sheep's wool which is 100% biodegradable and the extent of glazing has been reduced compared to previous designs. PV panels will be installed to generate renewable energy.

7.15 The external shell is designed to prevent air leakage and achieve the U-value required by current building regulation standards, and McDonald's utilise a sophisticated building management control system with specifically engineered energy reduction strategies to maximise operating efficiencies. McDonald's kitchen appliances have standby reminders, and a metering system has been introduced which measures the amount of electricity used in every half hour of the day. Restaurant Managers receive daily graphs to help them make energy saving adjustments.

7.16 All new restaurants are fitted with standard equipment and maintenance programmes, in line with Green Building Guidelines, which were introduced as a McDonald's Europe initiative and include:

- 1 Lighting - LED lighting is also used, resulting in a 50% reduction in energy use compared to fluorescent lights.
- 2 Water - Auto shut-off taps fitted to wash-hand basins in addition to flow control limited to 6l/min; replacement of urinals with waterless units and WCs fitted with dual flush of 4.5l and 3l flushes (unless external drainage requires greater volume). In addition, systems are leak checked with hot water temperatures reduced to a maximum of 60 degrees C. Pipes are checked for missing insulation.
- 3 HVAC - Automatic closures fitted to all internal doors and draft-proofing fitted or repaired to all doors and windows, including the use of energy save reminder stickers in the back of house area. Variable speed control fans are installed so that they are not required to run when ventilation is not required, and room sensors installed to monitor internal air temperatures.

Minimising transport impacts and reducing carbon dioxide emissions

7.17 Cooking oil from restaurants is recycled into biodiesel using local collectors. The biodiesel is then used as fuel by McDonald's vehicles. Biodiesel is now being used in all delivery trucks and results in a significant carbon saving.

Recycling strategy and the use of recycled materials

7.18 Within the supply chain, McDonald's vision is one where all food and packaging is sourced sustainably. They have undertaken a number of measures in recent years to try to promote better environmental standards through the whole supply chain.

7.19 McDonald's is committed to using recycled materials wherever possible, throughout the business and has stepped up its commitment to recycling further, setting UK goals, including 100% of McDonald's customer packaging will be made from renewable, recycled or certified sources and will be designed to be recycled or reused at end of life, by 2024.

- 7.20 The business has taken a number of steps to continue to lead when it comes to sustainable packaging and further address the issue of reducing plastic across the supply chain:
- 7.21 The removal of plastic lids from McFlurry will see 385 tonnes of plastic removed from the supply chain each year, and the introduction of fibre-based salad boxes will also see 105 tonnes of plastic removed annually. The new salad boxes can be recycled with any other paper. Indeed, McDonald's is a member of the National Cup Recycling Scheme which brings together major retailers, waste management companies and UK paper mills with the shared aim of growing the infrastructure needed to increase the number of paper cups being collected and recycled across the UK. McFlurry cups can be recycled along with other paper cups in one of the many recycling points that has been established across the country through the collaboration of retailers including Pret a Manger, Costa and McDonald's restaurants.
- 7.22 22,000 tonnes of outer packaging cardboard is now recycled from restaurants every year, with zero waste to landfill. Only 8% of the packaging used for McDonald's products is made from plastic, with the majority already being made from fully certified fibre. McDonald's reuses delivery packaging wherever possible, in accordance with food safety laws. The vast majority of kitchen waste is recycled. Staff separate corrugated cardboard, used cooking oil, food waste, clean plastic paper and tin from all back of house areas for recycling.
- 7.23 All restaurants aim to recycle 100% of their corrugated cardboard, which in itself accounts for 15% of a restaurant's average total waste. In addition, the delivery trays and crates are returned to suppliers for reuse. Delivery vehicles also carry recyclable materials on return trips, backhauling over 80% of all cardboard.
- 7.24 McDonald's UK has a long-term goal to send zero waste to landfill by reducing operational waste, recycling as much as possible, and diverting the remainder to a more sustainable solution. To further minimise waste, McDonald's has joined the Valpak distributor take back scheme, which ensures that redundant equipment is recycled with accredited companies.
- 7.25 Customer recycling stations are installed in all new restaurants, to allow customers to separate paper cups, plastic bottles and cups, and decant liquids. The cups will be sent to a specialist paper cup recycler and the plastic will be recycled along with the plastic from the kitchens.

Sustainable development and climate change

- 7.26 McDonald's has a commitment to addressing the climate crisis. To achieve this, the following corporate ambitions have been set to enhance sustainability:
- 1 A commitment to achieving net zero carbon emissions by 2040 – the proposed drive-thru restaurant has been designed with this goal in mind;
 - 2 Ensuring that the animal feed used by its suppliers is deforestation free by 2026;
 - 3 The aim to source all packaging from renewable and recyclable materials by 2025;
 - 4 Over 80% of kitchen waste is recycled, which equates to 40% of total waste; and,
 - 5 Provision of electric vehicle charging points to encourage greener travel.

8.0 Conclusions

- 8.1 This Planning Statement has been prepared by Lichfields on behalf of McDonald's Restaurants Ltd. It accompanies a planning application for the development of a McDonald's drive-thru restaurant at Land off Common Road, Merthyr Tydfil.
- 8.2 This Statement provides context of the site and its surroundings and details of the development, and has assessed the application proposals against Future Wales, PPW, and the Merthyr Tydfil Council LDP. It has also sought to consider the proposals in relation to other relevant material considerations.
- 8.3 The key material considerations are as follows:
- 1 The site is an underutilised previously developed land, within the settlement boundary therefore the principle of development is acceptable;
 - 2 The proposed restaurant use would not have a material impact upon the ability of the Council to meet employment needs within the authority area – indeed it would contribute directly to it;
 - 3 No alternative, sequentially preferable sites have been identified within and adjacent to town and district centres;
 - 4 The proposed use is well suited to the site and its location, complementing the surrounding context and uses;
 - 5 The design is high quality and would provide an attractive development for a complementary use within the business park. This will include a new cycleway / footpath surrounded by high quality green infrastructure.
 - 6 The application proposals include a comprehensive landscape scheme, with replacement tree planting, biodiversity benefits and the rerouting and upgrading of the existing pathway;
 - 7 The accompanying LVA concludes that the proposed development is suitable at this site in respect of landscape or visual impact; and,
 - 8 Sensitive lighting will be installed to aid safe pedestrian movement not just around the site but on the proposed cycleway/footpath, having regard for the findings of the ecological appraisals.
- 8.4 Furthermore, the development will create significant local employment opportunities and wider economic benefits for Merthyr Tydfil, including:
- 1 Support 105 direct FTE construction jobs, as well as supporting a further 125 indirect FTE jobs during the construction phase;
 - 2 Generate an additional £10.8 million of Gross Value Added during construction;
 - 3 Create 105 direct headcount jobs (80 direct FTE jobs) on-site, once the proposals are completed and operational. This could support a further 45 indirect and induced FTE jobs in the wider region;
 - 4 Generate £2.0 million of additional GVA per annum through direct operational employment; and

- 5 Deliver an uplift in business rates revenue in the order of £58,000 per annum – a proportion of which would be retained locally.
- 8.5 In terms of other benefits of the scheme, McDonald's is a strong advocate of sustainability, with almost all restaurants 100% powered by renewable energy and 90% of its packaging being recyclable. As a result, the proposal would deliver social, economic and environmental benefits to the local area.
- 8.6 Overall, the proposed development accords with the statutory development plan and would deliver significant benefits to Merthyr Tydfil. On this basis, we respectfully request that planning permission is granted.

Appendix 1 Advertisement Details

Advert	Specification Booklet Code	Size (mm) (W X D X H)	Materials	Height above ground (mm)	Height of Text (mm)	Illumination	Quantity
See Proposed Building Elevations Advertisement Plan (reference 13888_AEW_2685_0009)							
Roof Letters	FG-MCD-1000	8693W x 100D x 1000H	Powdercoated RAL 9003 White (Satin finish). Faces to be 3mm 050 Opal Acrylic "McDonald's" text.	Elevation 1 5350 Elevation 2 3585	1000	Static - Max. 500cd/m ²	2
Collect Text	FG-MCD-553	2717W x 25D x 440H	Powdercoated RAL 9003 White (Satin finish). Faces to be 3mm 050 Refer to Elevations N/A 440 Refer to Elevations N/A 440 Opal Acrylic "COLLECT" text.	Both 371	440	Static - Max. 6500cd/m ²	2
Pay Text	FG-MCD-554	1197W x 25D x 439H	Powdercoated RAL 9003 White (Satin finish). Faces to be 3mm 050 Refer to Elevations N/A 439 Refer to Elevations N/A 440 Opal Acrylic "PAY" text.	939	439	Static - Max. 500cd/m ²	1
Wall Mounted Arch	FG-MCD-555C	1800W x 100D x 1575H	Powdercoated Pantone 123c (Satin finish). Faces to be 3mm 2252 Perspex Yellow acrylic "Golden Arch" symbol.	3775	1575	Static - Max. 500cd/m ²	1
Digital Unit Micro	FG-MCD-522A	283W x 123D x 215H	Single sided PPC aluminium housing panel with internally mounted digital media fixed to Pay Booth Window. Grey RAL 7022	939	N/A	Max. 500cd/m ²	1
See Proposed Site Advertisement Plan (reference 13888-AEW-2685-0008), Block Plan and Block Plan A (13888_AEW_2685_0401A)							
Keystone Sign E	N/A but see page 34 of McDonalds generic	5672 x 680 x 16000	PPC Aluminium Totem Sign with yellow acrylic internally	16000	Varies	Static – Max 500cd/m	1

Advert	Specification Booklet Code	Size (mm) (W X D X H)	Materials	Height above ground (mm)	Height of Text (mm)	Illumination	Quantity
	totem booklet		illuminated "Golden Arch" to both sides.				
Drive Totem	FG-MCD-004	1400 x 350 x 8000	PPC Aluminium Totem Sign with yellow acrylic internally illuminated "Golden Arch" to both sides.	8000	Varies	Static - Max. 500cd/m	1
Digital Unit Single	FG-MCD-525	840 x 100 x 2034	Steel framework clad in PPC aluminium panels finished in Grey 2034 RAL 7022	2034	N/A	Static - Max. 500cd/m ²)	1
Digital Unit Double	FG-MCD-524	1573 x 100 x 2034	Steel framework clad in PPC aluminium panels finished in Grey 2034 RAL 7022	2034	N/A	Static - Max. 500cd/m ²)	2
Double Sided Banner Unit	FG-MCD-018	4820 x 150 x 2060	Post Mounted Banner Unit. RAL 7022 Grey aluminium side panels with perforated metal "McDonald's" text sign.	2060	N/A	N/A	2
Accessible Parking Bay	FG-MCD-441	280W x 700H	Aluminium sign panel with applied vinyl graphics on metal sign post fitted via mass concrete foundation.	700	N/A	N/A	2
Parked Order Bay 1	FG-MCD-435	280W x 700H	Aluminium sign panel with applied vinyl graphics on metal sign post fitted via mass concrete foundation.	700	N/A	N/A	1
Look Left	FG-MCD-444	450W x 300H	Aluminium sign panel with applied vinyl graphics on metal sign post	700	N/A	N/A	1

Advert	Specification Booklet Code	Size (mm) (W X D X H)	Materials	Height above ground (mm)	Height of Text (mm)	Illumination	Quantity
			fitted via mass concrete foundation.				
Look Right	FG-MCD-445	450W x 300H	Aluminium sign panel with applied vinyl graphics on metal sign post fitted via mass concrete foundation.	700	N/A	N/A	2
Pedestrian Crossing	FG-MCD-079	412W x 360H	Aluminium sign panel with applied vinyl graphics on metal sign post fitted via mass concrete foundation.	700	N/A	N/A	4
Give Way	FG-MCD-078	412W x 360H	Aluminium sign panel with applied vinyl graphics on metal sign post fitted via mass concrete foundation.	700	N/A	N/A	2
Look both ways	FG-MCD-446	450W x 450H	Aluminium sign panel with applied vinyl graphics on metal sign post fitted via mass concrete foundation.	700	N/A	N/A	1

Appendix 2 Marketing Letter

Date: 28 May 2025

To Whom It May Concern

Subject: Pengarnddu Ind Est, Dowlais Top, CF48 2YG, Heads of the Valleys Merthyr Tydfil

I outline below the marketing activities carried out in association with the sale of the abovementioned land parcel.

The property became vacant in mid/late 2020 as it became surplus to Breedon's requirements as part of the existing property portfolio. Breedon informed their regular estate agents (Savills and Fisher German) that the site was available. Particulars were produced and the site valued in the 3rd quarter of 2020.

Limited interest was generated from the parties listed below.

- Aldi UK – Initial interest was based on a potential location for a supermarket however the site's topography and small size ultimately proved it to be unsuitable for their uses.
- Starbucks – Initial interest based on a potential location for a Starbucks Café. Again, the limited size of the site and uncertainty regards the suitability of the utilities connections.
- Local logistics operator – Brief interest was expressed by a local entity seeking to secure the site for temporary articulated lorry trailer parking. Ultimately the operator's interest fell away for unknown reasons, and they chose not to pursue further.

The Starbucks offer was the strongest interest generated and they made a formal offer to purchase the site in the 4th quarter of 2020. Due to this seemingly strong interest the site was not marketed further but this offer eventually fell away and no further interest in the site was generated. These marketing efforts were amongst the relevant regional industrial and commercial agents, which was the most efficient marketing method.

Overall, the site was marketed for several years with limited initial success due to a combination of factors, all of which appear to be rectified by McDonalds as part of their plans for the site.

Yours sincerely

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