

Our reference:
Your reference: P/23/0065

16 September 2024

Ms Judith Jones
Director of Neighbourhood Services
Planning & Countryside Division
Merthyr Tydfil County Borough Council
Unit 5 Triangle Business Park
Pentrebach
Merthyr Tydfil
CF48 4TQ

Dear Judith,

**Planning application for mixed leisure development ref: P/23/0065
Land to the south west of the A470/A4102 roundabout at Rhydycar West, Merthyr Tydfil**

As you may be aware we are yet to receive a reply to our letter of the 24 July 2024. We would be grateful if you could outline your timeline for a response.

We are also concerned to note that our letter of the 24 July 2024, has as at the date of this letter, not been uploaded to the Council's application portal. Could you confirm the reasons for the delay. As an Application background document, it is an important document and does need to be uploaded as soon as possible.

You confirmed in your recent email that you have now taken over conduct of this Application following the departure of the Case Officer. As such, we felt would be of assistance to provide you with a comprehensive summary of the Application's journey, along with a summary of the position to date. We hope you will find this helpful in terms of bringing you up to speed with the detail of matters.

Consultation responses

Consultation was carried out in April 2023, shortly after the Application's submission, and in May 2024, shortly after the submission of further information. This has resulted in the responses (see Appendix 1 attached to this letter), from statutory and non-statutory consultees and interested third parties. As the Council will be aware, conditions have been requested. However, there are no objections from any statutory consultee.

The only comments received from MTCBC internal departments are from the Planning Policy section, Highway Department, Ecologist, initial comments from the LPA's consultant on landscape matters and comments from the Public Rights of Way section. Surrounding authorities either raise no objection or positively support the proposal.

The Council's web site confirms that 132 public comments have been received, noting that 124 are supportive and 8 are objecting but does not provide the comments to allow any analysis of the issue raised. We would be grateful if copies of all representations could be sent to us to allow us to review those representations. For convenience, however, we attach as Appendix 2 copies of selected letters of support we have been copied into from the following organisations:

Key Considerations (a summary table appears on page 7, below)

1. LDP and Local Policy

Summary:

- a. **Policy SW4** states that "Outside defined settlement boundaries, proposals will be regarded as 'countryside development' and will not be permitted unless the development... is for tourism, recreation or leisure facilities or complementary development where the need for a countryside location is fully justified." Reasoned justification to this policy, provided at para 6.4.30 of the LDP, notes that the economy of the countryside can be complemented by "sustainable tourism and other forms of economic development" and that "Complementary tourism, leisure and recreation development could include, for example, visitor accommodation and new access." It is clear, therefore, that the proposed development (which comprises a substantial economic development and includes visitor accommodation) can, in principle, satisfy the SW4 policy requirements.
- b. **Policy EcW7** states that "Low-impact tourism, leisure and recreation development is development that, through its low environmental impact, either enhances or does not significantly diminish environmental quality. It should directly benefit local communities and be respectful to wildlife. It includes tourism, leisure and recreation land-based activities that are capable of being removed without leaving a permanent trace..."

The policy seeks to support low-impact tourism, leisure and recreation that minimises environmental impacts, in 'countryside locations' (our emphasis). From this, it is clear the requirements for development to be considered low impact are completely different from the scale of development, as claimed in the Policy comments.

The proposal:

- (i) enhances and does not significantly diminish environmental quality,
 - (ii) is of direct benefit to local communities (see economic and health impact statements),
 - (iii) is respectful to wildlife and minimises environmental impacts (see EIA). It therefore satisfies Policy EcW7.
- c. **Policy EcW3** mandates a sequential approach for site selection. There is no policy requirement to break up ('disaggregate') the development as this would fundamentally undermine the business case for the proposal. It is clear that there are no town-centre or edge of centre sites

in MTCBC capable of accommodating the development proposed, nor any which can provide the sloping topography necessary for the snow centre.

Statutory Consultee Responses: N/A

Merthyr Council Response: Response received 10 May 2023, stating that need for a countryside location "is only very briefly covered in the Planning Statement". We are not sure if section 4.2 of the ES, which sets out the position in detail, was overlooked. In any event, the applicant's position was reiterated and expanded upon in a submission of 9 April 2024 and again in our letter of 24 July 2024. No response has been received.

2. Ecology

Summary: Planning Policy Wales states that "In wholly exceptional circumstances and only where development is considered to be appropriate and is not likely to damage a SSSI and there is broad and clear agreement for mitigation and enhancement as part of a development plan should development be proposed."

An option has been secured to purchase additional third-party land to use for ecological mitigation and enhancement, such that the application demonstrates a net benefit for biodiversity. This land is known as Blaencanaid Farm and is approximately 17ha of land which borders the application site. This specific area was identified and selected as a result of close cooperation and discussions with NRW over an extensive time period. The 12 July 2024 NRW comments confirm that the package of mitigation, compensation and enhancements for long-term management of the SSSI and site as a whole would be appropriate taking account of the step-wise approach and that they would expect to see appropriately worded planning conditions and/or planning obligations which ensures the proposed mitigation, compensation and enhancements will be finalised, agreed and then effectively delivered for the lifetime of the development. We are content to accept conditions/obligations along these lines. It is for the LPA to conclude the development comprises "wholly exceptional circumstances", albeit we believe the nature, scale and benefits of the development clearly meet this requirement. Your confirmation would be appreciated.

Statutory Consultee Responses: NRW raise no objection to the development and comment that the proposals take appropriate account of the stepwise approach.

In particular, NRW make the following more detailed comments: *"The applicant states that the part of the SSSI being lost to development does not contain 'any significant representations of the primary features of special habitat or mycological [fungi] interest underpinning the designation. Thus, it is considered that the direct loss of SSSI land to the development will have little or no impact on the national and international mycological importance of the SSSI and will not result in the direct loss of any substantive quantum of the cited marshy grassland, acid grassland or heathland habitats, including those supporting the site's current population of marsh fritillary butterfly. Consequently, it is the secondary interest features of the SSSI that will be directly affected, in particular woodland, scrub and 'ffridd' habitats of a type falling outside the scope of the primary interest features."*

We are satisfied with this analysis regarding the location of notified features of the SSSI (referred to as 'primary features' by the applicant). We consider the impact on the notified features has been minimised in terms of the siting and orientation of the development within the SSSI boundary."

The site has been extensively and repeatedly surveyed (including for GCN and bats) since 2015. Despite the volume and detail of this data over many years, they note that it is difficult to advise on the impact of the development on bats and GCN but welcome the proposals for the enhancement of habitat for GCN over the wider landholding. At the meeting with yourself and NRW on 29 August 2024, the applicant agreed to provide further information requested by NRW on GCN mitigation specific to the creation of new and restored ponds. NRW have

undertaken a further review of the position as regards the submitted bat information and surveys and we will be providing further feedback to NRW shortly.

NRW note that the reserved matters application(s) will need to carry out updated ground-based and climbed bat assessments, and that as a result of updated surveys, further mitigation and/or compensation may be required in the future. They consider this aspect can be addressed by the application of an appropriately worded condition. We are content to accept conditions along these lines.

Merthyr Council Response: Council ecologist provided comments dated 15th July. Various points raised mirror those being considered by NRW. We anticipate a meeting would be appropriate to discuss these matters once NRW's position has crystallised.

3. Transportation & Movement

Summary: A thorough and robust Transport Assessment and a far reaching Travel Plan are provided in support of the application. The development will provide a shuttle bus (free for staff and visitors alike) from the railway station/public transport interchange to the development to increase sustainable transport as part of a suite of Travel Plan initiatives which will be secured by planning condition or s106 obligation. Other initiatives include provision of relevant public transport information, travel planning advice, ticketing promotions, shower/changing facilities, car park management and app based services.

Initial comments raised queries in respect of the applied parking calculations/methodology – the methodology we used was standard industry practice. There has been extensive engagement, which has result in additional information being provided, including providing (as requested) an alternative sensitivity analysis using non-standard industry practice which conclude a more favourable parking position. Therefore, the sensitivity analysis requested confirmed the robustness of our approach and the acceptability of our parking position. There remains the ability to refine this and provide additional parking at Reserved Matters stage, in the normal way.

You will be aware our trip attraction methodology has been accepted by the South Wales Trunk Road Authority. Welsh Government's email to you of 7 August confirmed "we satisfied that the modelling is worst case and note the comments that support proposals without works to the trunk road junctions" and that "Therefore we have no further comments relating to the TA" and therefore there is no objection.

Statutory Consultee Responses: Final South Wales Trunk Road Authority comments on the submitted WCHAR are awaited and anticipated soon.

Merthyr Council Response: The Highway Department provided comments dated 12 July 2024. Notwithstanding 12 pages of commentary, the consultee only raises a highway objection on two grounds: (1) a substandard emergency access and (2) insufficient information to demonstrate that the proposed off-street parking provision is sufficient to meet the developments demands at peak times.

We note that neither South Wales Police (comments of 24 June 2024) or the South Wales Fire and Rescue Service (comments of 28 May 2024) have raised any concern whatsoever about the secondary emergency access. Is the Highway Department aware of these consultee comments? Furthermore, as set out above, having engaged in extensive discussions with the Highway Department and their consultants and providing extensive additional information during those discussions, the sensitivity analysis requested confirmed the robustness of our approach and the acceptability of our parking provision. Certainly, no further information has been requested of us in this regard. If, notwithstanding our submissions, it is considered that additional parking is still required, why has this not been requested of us in the past 18+ months? There is ample scope to provide overspill parking to provide a buffer at peak times should you wish to explore and discuss this point yet you have neglected to do so.

4. Community & Socio-Economic

Summary: The economic case for the development is overwhelmingly positive and recognised as such in the ES.

The development:

- Employment: will create c.1,594 net additional direct employment opportunities over the construction period and c.842 gross direct jobs during the operational phase (including training and apprenticeship opportunities in the local and wider area).
- will lead to a very significant boost to Gross Value Added (GVA) of c.£38.1 million per annum. For comparative purposes the GVA generated by the Principality Stadium in Cardiff stood at c.£19.5 million in 2017-18.
- will create an inward capital investment from total construction cost of £255.5m (based on Gleeds cost plan at the time of planning submission).
- the construction phase of Rhydycar West would contribute c.£317.6m in additional Gross Value Added (GVA) to the economy over the duration of the construction period. GVA is the value of the amount of goods and services that have been produced, less the cost of all inputs and raw materials. It represents the additional value that is added through economic activity on site and through the supply chain.

The s106 Agreement will provide the legal mechanism to secure the social economic benefits offered by the development. These include training and apprenticeship opportunities. The Applicant has already secured a mechanism for the creation and delivery of employment opportunities through an MoU with Tydfil Training and Merthyr College to facilitate these opportunities. Health and wellbeing benefits in the local area with preferential rates and tariffs for local residents. Extensive engagement has already begun and is continuing with local businesses (e.g. Merthyr Town Centre), regional businesses along with neighbouring boroughs and Welsh Government to identify and deliver new business opportunities and synergies from the development that will have very significant socio-economic impact on the Northern Valleys in particular and beyond.

Statutory Consultee Responses: N/A

Merthyr Council Response: No comments received from MTCBC Economic Development.

5. Landscape and Visual Impact Assessment (LVIA)

Summary: The LPA instructed a consultant to audit the LVIA. A non-guidance-compliant audit was carried out raising objections/concerns. However, the consultant immediately retired upon completing the audit and was therefore unable to engage in any discussions so as to both understand and test his views. Despite this we have rebutted the audit in detail and submitted our response. To date the LPA has not provided any feedback on our response. We would ask the LPA to provide comments.

Statutory Consultee Responses: NRW raise no objection on landscape grounds and are satisfied with the broad principles for planting and management of vegetation shown on the Green Infrastructure Parameters Plan.

Merthyr Council Response: No response received to latest submission (April 2024).

6. Arboriculture

Summary: The proposed scheme will require the felling of 69 individually survey trees, 17 groups, and parts of a further ten groups of trees. No ancient woodland is located within the application site boundary.

The Green Infrastructure Statement confirms that the 3:1 ratio of replanting (now required by PPW) can be met.

Statutory Consultee Responses: N/A

Merthyr Council Response: MTCBC has yet to provide any formal comments on this issue.

7. Design

Summary: Design is a Reserved Matter and will be considered at a later stage. The Design and Access Statement sets appropriate parameters for the development and describes how the siting of the proposed development has been determined in order to reduce biodiversity impact as far as possible and limiting SSSI land take as far as possible (3% of the total designated area). A Future Generations Act compliant design process has been followed throughout.

Statutory Consultee Responses: N/A

Merthyr Council Response: MTCBC has yet to provide any formal comments on this issue.

8. Geology & Ground Quality

Summary: Remedial works will be required to facilitate the development in terms of risks associated with geotechnical parameters, coal mining legacy and ground contamination. Prior to construction there will be site investigation work mandated by planning conditions.

Statutory Consultee Responses: No objection on these matters from NRW or The Coal Authority, subject to conditions.

Merthyr Council Response: MTCBC has yet to provide any formal comments on this issue.

9. Archaeology and Cultural Heritage

Summary: No significant impact is identified in the ES. The scheduled ancient monuments (SAM's) will be preserved and managed in consultation with Cadw. The development will bring benefits for example a new heritage trail linking to other cultural and heritage features and attractions in Merthyr such as Cyfarthfa Castle.

Statutory Consultee Responses: Cadw and GGAT raise no objection subject to conditions (including long term management of the SAMs on the site). A heads of terms management plan for the SAMs has already been agreed with Cadw and submitted with the planning application.

Merthyr Council Response: MTCBC has yet to provide any formal comments on this issue.

10. Greenhouse Gas Emissions & Climate Change

Summary: A site-wide ambient loop network is proposed allowing energy to be shared between areas requiring heating and cooling. The developed design will be able to meet space heating, cooling and hot water demand for the entire site creating a site without any local emissions arising from the regulated energy demand. The development will utilise a verified green tariff so that zero emissions are achieved from day-1 of operation. Efficient thermal envelopes, on-site heat sharing networks and the implementation of low and zero carbon (LZC) technologies will minimise the energy usage of the Proposed Development. The applicant has signed an MoU with DST and Batri to facilitate the provision of industry leading PVs at the development based on new advanced technology and efficiency. Through the measures outlined in the Energy Strategy, it is anticipated that overall, approximately a ~92% reduction in CO2 emissions could be achieved beyond the 'gas boiler baseline', inclusive of all measures.

Statutory Consultee Responses: N/A

Merthyr Council Response: MTCBC has yet to provide any formal comments on this issue.

11. Hydrology & Hydrogeology

Summary: Apart from pluvial flood risk, there is no risk of flooding to or from the proposed development from any flood sources (see FCA). Any potential pluvial flood risk to or from the proposed development will be mitigated using the measures detailed in the FCA; watercourses will be rerouted subject to appropriate consents and approvals, and a SuDS compliant drainage scheme will be implemented. Furthermore, the proposed development will add betterment in terms of surface water runoff rates. Accordingly, the development is Policy compliant.

Statutory Consultee Responses: NRW interim comments pointed out a small technical matter regarding coverage of the Flood Consequence Assessment which has since been addressed. NRW's comments of 12 July 2024 confirm they are now satisfied with the submitted information and have no objection on flood risk grounds.

Merthyr Council Response: MTCBC has yet to provide any formal comments on this issue.

12. Noise, Air Quality, Light

Summary: No significant impact has been identified. Standard construction mitigation is required and can be conditioned.

Statutory Consultee Responses: N/A

Merthyr Council Response: MTCBC EHO has yet to provide any formal comments.

13. Health

Summary: The proposals will offer a range of health and well-being benefits for visitors, employees and nearby residents to the resort and surrounding infrastructure. The project builds on a range of existing facilities which deliver and promote active lifestyles and participation in outdoor sporting and leisure activities. The health benefits offered will help to address entrenched health, life expectancy, wellbeing /mental health in the local population (adults and children).

Statutory Consultee Responses: N/A

Merthyr Council Response: MTCBC has yet to provide any formal comments on this issue.

14. Utilities

Summary: Welsh Water suggest a condition requiring a scheme to demonstrate that the existing water supply network can suitably accommodate the proposed development site and, if necessary, a scheme to upgrade the existing public water supply network. No objections are raised.

Statutory Consultee Responses: Welsh Water, as above.

Merthyr Council Response: No response received.

15. Planning obligations/conditions

Summary: Offered Heads of terms for a s106 Agreement and planning conditions were submitted on 12 February 2024. No response has been received to date.

Statutory Consultee Responses: N/A.

Merthyr Council Response: MTCBC has yet to provide any formal comments on this issue.

16. Rights of Way

Summary: The application proposes the stopping up and diversion of various rights of way to facilitate the development and maintain access to and through the site. Interim comments were

made by the Rights of Way officer on 11 April 2023 and following meetings held on 26 September and 30 October 2023, a note of clarification was submitted. On 19 August 2024 additional comments from the PRoW department have been posted on the application portal confirming "The ROW department has met with the applicant and is satisfied that suitable measures can be put in place to either divert or extinguish the routes that could be affected by the development."

Statutory Consultee Responses: N/A.

Merthyr Council Response: No objection from PRoW department.

17. Wellbeing of Future Generations

Summary: The Act defines "sustainable development" as the process of improving the economic, social, environmental and cultural well-being by taking action, in accordance with the sustainable development principle. The sustainable development principle is made up of five ways of working. Section 5.1 of the Planning Statement sets out how the project looks to the **long term** so that the development does not compromise the ability of future generations to meet their own needs; takes an **integrated** approach addressing the well-being goals; **involves** (and has involved) a diverse section of the population in the formulation of the plans; has adopted a **collaborative** approach to find shared sustainable solutions; and has sought to understand the root causes of issues to **prevent** them from occurring.

Statutory Consultee Responses: N/A.

Merthyr Council Response: MTCBC has yet to provide any formal comments on this issue.

Summary

Given the foregoing, we understand the position to be as set out in the table below.

LPA understood to be satisfied – no issues raised/no comments received/comments received and satisfied	
1	Arboriculture
2	Design
3	Greenhouse Gas Emissions & Climate Change
4	Noise
5	Air Quality
6	Light
7	Health
8	Utilities
9	Wellbeing of Future Generations
10	Landscape
11	Geology & Ground Quality
12	Community & Socio Economic
13	Archaeology and Cultural Heritage
14	Hydrology & Hydrogeology
15	MTCBC Planning Policy
16	Rights of Way
17	Planning Obligations/conditions
Responses outstanding/requiring discussion	
18	Ecology
19	Transport

We would be grateful if you could confirm if the above accords with your understanding of matters and, further, to confirm whether anything more is required from us in respect of any of the above issues or indeed anything else.

Throughout the journey of the development proposals, we have been committed to working collaboratively the Council and other stakeholders in a positive and proactive manner. With this in mind, as mentioned previously on numerous occasions, we think it is important to fix a meeting to discuss the above points and the Application generally and would be grateful if you could circulate you availability for this.

We look forward to hearing from you in due course.

Yours sincerely

Appendix 1

Consultation responses

MTCBC Planning Policy

(10.5.23) Considers the proposal to be contrary to Policies SW4 and EcW7 of the LDP because the proposed countryside location has not been fully justified, the proposed development cannot be classed as low-impact tourism and further work also needs to be carried out in relation to the sequential approach of site selection. [See section 1 of the above letter].

Natural Resources Wales

(25.5.23) Interim comments received seeking further species management information and a widened coverage of the FCA. These were provided.

(12.7.24) NRW raise no objection to the development and comment that the proposals take appropriate account of the stepwise approach.

SSSI impacts will not be completely avoided due to the snow centre and slope, which cannot be located elsewhere within the site for topographical reasons. It is for the LPA to consider if reasonable alternative sites are available.

The part of the SSSI being lost to development does not contain any significant primary features of special habitat. The direct loss of SSSI land to the development will have little or no impact on the national and international mycological importance of the SSSI. Consequently, it is the secondary interest features of the SSSI that will be directly affected, in particular woodland, scrub and 'ffridd' habitats of a type falling outside the scope of the primary interest features. We consider the impact on the notified features has been minimised in terms of the siting and orientation of the development within the SSSI boundary.

The proposed mitigation and compensation including long term management are sound and, once implemented, will achieve biodiversity net benefit.

At a meeting with NRW on 29 August 2024, the applicant agreed to provide further information requested by NRW on GCN mitigation specific to the creation of new and restored ponds. NRW have undertaken a further review of the position as regards the submitted bat information and surveys and we will be providing further feedback to NRW shortly. They note that the reserved matters application(s) will need to carry out updated ground-based and climbed bat assessments, and that as a result of updated surveys, further mitigation and/or compensation may be required in the future. They consider this aspect can be addressed by the application of an appropriately worded condition. We are content with conditions along these lines.

NRW are satisfied with the latest information from the applicant regarding landscape and flood risk. Planning conditions (if permission is to be granted) on land contamination and groundwaters and ornithology are provided.

Highway Authority

(20.9.23) LHA's comments received raising concern with the southern access due to a misunderstanding this was a customer access, rather than an emergency access as proposed, and querying the parking accumulation methodology.

Following meetings and exchanges of correspondence between October 2023 and January 2024, comments were finally received in June 2024. These comments raise the following points:

- The highway leading to the secondary emergency access is insufficient to accommodate 2-way traffic flow along its length and so is unsuitable should there be a major incident on the site (this, notwithstanding the absence of concern being raised by either the Police or the Fire & Rescue Service);

- An absence of time frames to meet the modal shift targets set out in the submitted Travel Plan and associated sanctions (albeit initiatives, targets and sanctions would normally be imposed by the LPA through discussion with the applicant. No discussion has been initiated in this regard);
- An absence of plans showing walking/cycle routes serving the site (this, despite no such plan having been requested by the Highway Authority in the last 18+ months);
- Concern that the proposed shuttle bus service will come at a cost to the visitor which may be prohibitive to larger families (this despite the fact the shuttle bus has been clearly stated to be free to staff and visitors alike – confirmed in various places including on page 12 of Council's consultant's review, the s106 HoTs dated 12.2.24 and the applicant's transport response dated 13.11.23);
- Concern that parking demand will exceed the level proposed (this notwithstanding the extensive discussion on this point and the outcome of the additional modelling requested and provided. Positive engagement on this point would certainly resolve the matter, potentially through the provision of overspill parking);
- Notwithstanding the above, the HA's comments do provide comments on suggested conditions should the LPA wish to grant permission, many of which actually address the HA's above concerns!

South East Wales Trunk Road Authority

(30.8.23) It should be noted that in general terms the principles of modelling were agreed at pre-app and are accepted. In consideration to their compliance with the Active Travel Act Guidance Document 2021 / DMRB the application details are not sufficient to clear in respect of use of an existing footbridge (north) and underpass (south) - a WCHAR report would be expected. The required WCHAR was submitted on 9.4.24 and the Design Audit was submitted on 9.5.24. [Updated comments are awaited].

(7.8.24) confirmed "we are satisfied that the modelling is worst case and note the comments that support proposals without works to the trunk road junctions" and that "Therefore we have no further comments relating to the TA." SEWTRA therefore raise no objection.

Cadw

(6.4.23) Cadw concur with the view that the positive measures, which includes considerable improvements to the physical condition of designated heritage assets, will outweigh the indirect adverse impact to their settings.

Cadw concur with the offered Heads of Terms for the Conservation Management Plan but note this document will have to be agreed by MTCBC and Cadw and will need to be secured by the attachment of an appropriate condition to any planning permission that is granted.

(6.6.24) Confirms the advice given previously remains valid.

GGAT

(20.10.23) They are content with the mitigation outlined in the Environmental Statement (ES) which identifies and assesses significant impacts of the proposed development on archaeology and cultural heritage resources, and, outlines mitigation and/or compensation measures. They recommend that a condition requiring the submission of a detailed written scheme of investigation for a programme of archaeological work should be attached to any consent granted.

The Coal Authority

(18.4.23) Concerns were initially raised due to the site being within the potential zone of influence of former mine workings and historic unrecorded coal mining activity, including workings at shallow depth. However, The Coal Authority's Planning & Development Team appreciated that it is not always possible for large scale development proposals, such as that currently proposed, to avoid mine entries and their associated zones of influence and acknowledged the applicant's intention to locate and treat the mine entries. In order to allay these concerns, a suitable plan showing the relationship between the proposed development and the recorded mine entries was requested. We submitted a Mine Entries plan on 16.8.23 and TCA was reconsulted.

(8.9.23) The Coal Authority's (TCA) Planning & Development Team considers that the submitted information satisfactorily addresses the concerns raised in their initial consultation response. As such, they were able to withdraw their objection to the outline planning application subject to the imposition of conditions to secure the investigation and remediation of coal mining legacy affecting the site.

(31.5.24) TCA's previous comments and recommendations, set out in their letter of 8 September 2023, remain valid and relevant to the decision making process.

Welsh Water

(3.4.23) set out that the current water supply system cannot accommodate the proposal and that that a Hydraulic Assessment is required, in order to understand the impact the proposed development will have on the existing water supply system and to identify solutions where necessary. In the absence of a Hydraulic Assessment, they suggest a condition requiring a scheme to demonstrate that the existing water supply network can suitably accommodate the proposed development site and, if necessary, a scheme to upgrade the existing public water supply network. The applicant has confirmed acceptance of this condition and would carry out the Hydraulic Assessment at the RM stage.

No concerns are raised with the Wastewater Treatment Works for the treatment of discharges from this site. Standard conditions are recommended regarding discharge to the public sewerage system.

(11.6.24) Confirms the advice given previously remains valid.

Public Right of Way officer

(11.4.24) The application affects a legal right of way which must be protected at all times. It also affects a number of other rights of way upon which the Inspector has made an interim decision that the rights of way exist and the applicant was invited to discuss all these rights of way with the rights of way department.

A subsequent meeting was held and correspondence entered into to clarify the application proposal, culminating in the submission of a clarificatory note on 30.11.23. On 19 August 2024 additional comments from the PRoW department confirm "The ROW department has met with the applicant and is satisfied that suitable measures can be put in place to either divert or extinguish the routes that could be affected by the development."

South Wales Police

(17.4.23) South Wales Police have no objection to this application and are very keen to work with the developers so that a Secured By Design Gold Award could be attained for the whole site. It is good to see that the principles of Secured By Design have been included in the Design and Access Statement and South Wales Police are happy with the overall layout. Detailed comments on design are made which are best considered at RM stage. Notably, the South Wales Police do not object to the proposed emergency access arrangements.

South Wales Fire & Rescue

(3.5.23) A comprehensive fire strategy is requested and the provision of adequate water supplies on the site for firefighting purposes and access for emergency firefighting appliances should be considered. This can be required by 3.7m road width and height clearance. The proposed emergency access exceeds these minimum requirements.

(28.5.24) Revised comments received confirming the Fire Authority has no objection to the proposed development and refers the Local Planning Authority to any current standing advice by the Fire Authority about the consultation. Notably, the Fire & Rescue Service do not object to the proposed emergency access arrangements.

HSE

(4.6.24) confirm this application does not fall within any HSE consultation zones and there is therefore no need to consult the HSE Land Use Planning (LUP) team on this planning application.

Appendix 2

Third party letters of support

Head of Planning and Regeneration
Merthyr Tydfil County Borough
Council
Civic Centre
Castle Street
Merthyr Tydfil
CF47 8AN

8 August 2023

Dear Sir/Madam,

Town and Country Planning Act 1990 (as amended)

Your Ref: P/23/0065

RE: Outline application for erection of a mixed leisure development comprising Indoor Snow Centre (up to 39,200 sq m), Waterpark (up to 7,500 sq m), Indoor Activity Centre (up to 9,000 sq m), External Activity Areas, hotel accommodation (up to 418 bedrooms), Woodland Lodge accommodation (up to 30 units), car parking (up to 830 spaces) and associated earthworks, access, drainage, servicing and utilities connections/infrastructure.

At: Land to the Southwest of the A470/A4102 Roundabout at Rhydycar West, Merthyr Tydfil.

Thank you for your letter of 3rd April 2023 (received 17th April) inviting our observations on the information submitted for the above planning application. Apologies for the delay in providing a response.

After reviewing the documentation accompanying the application, we wish to offer our support to the proposal and believe that the local and wider economic impact of a development such as the one proposed in this application cannot be underestimated. This development has the potential to have significant impact upon economic growth in the Heads of the Valleys area by attracting investment and visitors that will benefit local business and nearby attractions.

It will support regeneration of the area and has the potential to attract both local and international visitors to the area. The close proximity of _____ means it could share in some of the economic benefits from this development if the application is given approval to proceed.

Alongside the physical site changes, the development will present a range of employment opportunities to local labour market including residents of Merthyr Tydfil and surrounding areas i.e., Blaenau Gwent. The area is challenged by low economic activity rates, pockets of high deprivation and skills challenges.

As a Council we are committed to transforming Blaenau Gwent into a more prosperous and welcoming area that plays a part on a regional and national stage. Having a regionally significant facility such as that proposed for Rhydycar West presents an excellent opportunity to act as a catalyst for investment in the Heads of the Valleys area.

Yours faithfully

Annwyl/Dear Sir/Madam,

I am delighted to support the proposals by the applicant for the investment known as Rhydycar West in Merthyr Tydfil reference P/23/0065.

The scheme's scale and range of activities will be a landmark development for the Heads of the Valley and will make a significant contribution in attracting further investment, visitors and tourists to this strategic location in the Cardiff Capital Region (CCR). The region already has a vibrant city offer, stunning coastline, incredible countryside and a reputation for delivering major world class sporting events. The Rhydycar proposal will enhance the existing tourism attractions.

In the current climate with challenging economic headwinds the proposed investment will have a positive impact on confidence within the Heads of the Valley and provide an enormous boost for the many businesses in the area who are dealing with the twin challenges of rising interest rates and inflation. The development will be seen by external investors as a sign of confidence in the area and offer existing communities the prospect of much needed employment in a sector with significant growth potential.

The applicant attended the international property symposium, MIPIM in Cannes last year, with public and private sector partners from the CCR and the positive responses received in respect of the Rhydycar West scheme suggested the scheme will attract a great deal of interest from national and international investors.

Yn gywir,
Yours sincerely,

Letter in support of Rhydycar West

Wed 06/12/2023 15:59

Dear Sir/Madam,

I write in support of the application by Rhydycar West and their proposals in Merthyr Tydfil.

As someone passionate about developing the visitor economy in the south Wales valleys, I am excited by these proposals and their ability to attract visitors from around the valleys and beyond.

I believe it is vital for our economic regeneration that we further develop a network of attractions in our region, to give visitors a range of activities, indoor and outdoor, active and less active. I think this application could play a big part in those efforts and have a real ripple effect, attracting people to the area, providing jobs and benefiting the local and regional economy as a result.

We have unique attributes in the south Wales valleys to attract visitors. We are situated between a national park and the coast, with a plethora of outdoor activities and natural beauty to attract visitors. We have some key former industrial sites and the heritage story they tell, such as Blaenavon World Heritage Town. We have the Valleys Regional Park and centres for people to visit, and private attractions like Zipworld. I believe Rhydycar West can be another cornerstone in our efforts to regenerate our valleys. It therefore has my full support.

Yours sincerely,

Ask for/Gofynnwch am
Our Ref/Ein Cyf
Your Ref/Eich Cyf
Tel/Ffôn
Direct Dial/Rhif Union
Date/Byddiad
E-Mail/E-Bost

Civic Centre/Canolfan Ddinesig
Newport/Casnewydd
South Wales/De Cymru
NP20 4UR

Dear

RE: Outline application for erection of a mixed leisure development comprising Indoor Snow Centre (up to 39,200 sq m), Water park (up to 7,500 sq m), Indoor Activity Centre (up to 9,000 sq m), Outdoor Activity Centre, Hotel Accommodation (up to 418 bedrooms), Woodland Lodge accommodation (up to 30 units), car parking (up to 830 spaces) and associated earthworks, access, drainage, servicing and utilities connections/infrastructure at Land To The South West Of The A470/A4102 Roundabout At Rhydycar West Merthyr Tydfil (Reference: P/23/0065)

I would like to offer my support for the proposed Indoor Snow Centre and wider leisure development at Rhydycar West, Merthyr Tydfil.

The proposed facility will make a positive addition to the leisure offer across the region and will complement the varied and high quality visitor attractions which make our region such a unique and attractive area. The local area and the region has the infrastructure to support increased tourism and the wider economic impact cannot be underestimated. The development will boost employment opportunities and for these reasons, I am pleased to offer my support.

Yours sincerely,

29 June 2020

By Email:

Ali Tyebkhan
Investment Director
Rhydycar West
Merthyr Tydfil
CF48 1UN

Dear Ali

Rhydycar West - Statement of Support

is a unique programme of collaborative working which seeks to enable transformational economic change through targeted investment in infrastructure, innovation and challenge-driven approaches to tackling industrial and societal issues. It is an investment in people and place and aims to bring fairness and opportunities for all, no matter where they live in the region. The programme has been designed to offer an alternative approach to traditional tried and tested economic intervention tools; it is a programme that recognises through targeting bespoke intervention. With tailor-made support the changes of economic revival should be far greater than expecting all partners to engage on a level playing field which creates further inequalities for some of our more economically challenged communities.

Inward investment into our Valley communities is a priority objective for the , from an economic prosperity prospective the development of Rhydycar West with partners would be seen as a significant project for the residents and businesses of Merthyr, and indeed across the region. Impact would be felt regionally, nationally and internationally with the creation of a first class destination that would be accessed from grass roots participants to more professional athletes. , through its current city deal structures, would like to support in creating the right environment for this to happen; we are able to make the right introductions and create support networks to assist with engagement and delivery.

The potential impact of having such a facility in South East Wales is warmly welcomed and supported by the

Yours sincerely

Dear Sir/Madam

Re: Rhydycar West / Marvel Project

Please accept this letter as support for the Rhydycar West project. As a
we are keen to work with the delivery partners to support this project.

Over the last two years, we have seen an increase in learner applications and enrolments into our travel and tourism courses and this has underpinned through the increasing tourism opportunities and the associated foundation economy sector within Merthyr Tydfil.

We have held initial discussions with the Marvel Team in relation to how we could engage collaboratively to develop recruitment, employability, skills and training opportunities to support both our current learners and the wider local community. In addition, we are keen to work with the Team to be able to offer work experience opportunities for our , something which has been highlighted in the 2022 South East Wales Regional Skills Plan, Foundational Economy priorities:

"IMPROVE WORK EXPERIENCE OPPORTUNITIES ACROSS THE HOSPITALITY, RETAIL AND TOURISM SECTORS FOR YOUNG PEOPLE IN AN EFFORT TO REDUCE CURRENT SKILLS SHORTAGES AND DISPEL NEGATIVE PERCEPTIONS OF CAREERS IN THESE SECTORS."

We would therefore welcome the opportunity to now take forward our initial discussions and further explore the opportunities that this project could bring to both the and wider community of Merthyr Tydfil.

If you require any further information regarding the college's support for the proposed project, please don't hesitate to contact me.

Best wishes

Re: Rhydycar West / Marvel Project

This letter confirms support for the above project as well as our desire to work with the delivery partners upon completion. We have held initial discussions with the Marvel Team in relation to how we could engage collaboratively to develop recruitment, employability and apprenticeship opportunities to support the local community.

Over the last few years, we have witnessed a significant increase in activity tourism and the associated foundation economy sector within Merthyr Tydfil. The project would act as a significant catalyst to enhance the current offer from the borough and create a multiplier for local business, many of whom we are currently working with. We would welcome the opportunity to expand on our initial discussions and further explore the training, development and enterprise potential this project could bring.

If you require any further information or clarification in relation as to how could work collaboratively with the proposed project, please feel free to contact me.

Best wishes

21.03.23

Letter to the Planning Officer, MTCBC, re Rhydycar West

I am writing on behalf of _____ to support the planning application for Rhydycar West for "a world class sports and leisure resort at Merthyr Tydfil". I do so because it is our _____ view that the proposal has the potential for highly beneficial synergies with our own plans for the development of Cyfarthfa Castle and Park.

In seeking to build a bigger stake for Merthyr Tydfil in the tourism economy, it seems to us that two things will be of vital importance: first, the creation of a large enough critical mass of activity; and, second, that proposals should cover a range of different activities that will provide visitors with variety and choice – addressing both the body and the mind.

Over the next decade the prospect of being able to offer two very attractive sporting facilities – the existing Bike Park and the proposed ski resort – as well as a major cultural and environmental attraction – a high quality museum and art gallery at Cyfarthfa – promises rich and varied offerings that, taken together, will be hugely beneficial. The whole can be greater than the sum of the parts.

The Cyfarthfa masterplan study estimated that a redeveloped museum and gallery at Cyfarthfa would be able to draw between 300,000 and 500,000 visitors a year. The Rhydycar West plan envisages 750,000 people being attracted to the snow sport centre each year. It seems to us that the proposed snow sports centre will be of considerable benefit to our own plans at Cyfarthfa, especially as the Rhydycar West proposal includes substantial hotel facilities at a scale and quality that do not currently exist in the town - a major point of weakness. It also envisages a year-round market.

With these synergies in mind, we have already had very positive discussions with the developers of Rhydycar West on the possible benefits of joint marketing initiatives.

If the Rhydycar West proposal is approved and the _____ is successful in realising its ambitions for Cyfarthfa, Merthyr Tydfil - its people and its visitors - will, in a comparatively short space of time, be able to look forward to having a 'string of pearls' stretching along the valley of the Taff from the Bike Park, through Rhydycar West to the Cyfarthfa Furnaces and an expanded Cyfarthfa Park, and on to the Cefn Coed viaduct and the Brecon Beacons beyond.

That short journey would encompass as rich a mix of activity tourism as could be found anywhere – cycling, skiing, hiking, heritage, the environment, education and culture. It would truly merit the adjective transformative.

For all these reasons we urge the Council to approve the proposal.

Planning application ref P/23/0065

Thu 30/03/2023 12:41

Good morning [REDACTED],

I recently met with Ali from the Rhydyar West development and he shared his vision and outline planning application for the adventure resort. We've been in touch with Ali for almost 10 years now as he has kept us in touch as things have progressed. I felt compelled to get in touch with the local planning department to voice my support for the project. As a local outdoor activity business owner a project of this scale could be a huge benefit for us in bringing more people to the area who are looking for exciting activity breaks. Between BikePark Wales, Rhydyar West, Rock UK, Plas Dol Y Gaer and the Brecon Beacons National Park we could create something truly incredible in the area, something of national significance.

Ali also shared his vision for ecological enhancement of the SINC areas of his site. We ourselves are working on a huge ecological enhancement project with NRW and the combined impact of these two projects could be truly massive.

Many thanks

This e-mail is intended only for the addressee named above and the contents must not be disclosed to any other person nor copies taken. Any views or opinions presented are solely those of the sender and do not necessarily represent those of [REDACTED] unless otherwise specifically stated. As internet communications are not secure, we do not accept legal responsibility for the contents of this message nor responsibility for any change made to this message after the original sender sent it. We advise you to carry out your own virus check before opening any attachment, as we cannot accept liability for any damage sustained as a result of any software viruses.

From:
Sent: Monday, May 8, 2023 4:56 PM
To:
Cc:
Subject: Letter of Support - P/23/0065

Good Afternoon,

Please find an attached a letter of support in reference to the planning application reference P/23/0065.

Kind Regards



8th May 2023

RE: Letter of support for Rhydycar West

As a business and an individual that has been actively involved in the growth of tourism in both North and South Wales for many years, I am delighted to be supporting Rhydycar West and their proposals for development in Merthyr Tydfil.

Supporting this application and its exciting vision will undoubtedly enhance and strengthen the surrounding communities, contributing to local infrastructure development helping to reduce rural inequality.

The economic ripple effect of tourism expansion like the application from Rhydycar West on rural communities is of critical importance. Local tradesmen, contractors, shopkeepers & B&B owners rely on the boost tourism can and does bring which in turn only increases revenue and custom to the local economy.

This application and its proposals have the full support of .

Kind regards

24 June 2024

Judith Jones
Head of Planning and Regeneration, Merthyr Tydfil County Borough Council
Civic Centre
Castle Street
Merthyr Tydfil
CF47 8AN

[Sent by email]

Dear Judith,

Re: P/23/0065 - RhydycarWest Planning Application

As [redacted], the high-performance National Governing Body for [redacted] and [redacted], I am pleased to write and confirm [redacted] strongly felt support for the development of the Rhydycar West Indoor Snow Centre.

British ski and snowboard athletes are achieving historic results on the world stage, but we do so without many of the "home nation" facilities and environments that so many of our competitors rely on. The development of a truly first-class training and competition facility in the UK would be game-changing for both the current and future generation of British snowsport athletes, as well as providing invaluable opportunities for aspiring coaches, technicians, and other professionals that play such an important part in the success of competitive British snowsport.

Based on the proposed facilities, we would very much see the Rhydycar West development as a key national centre of excellence and a natural home headquarters for [redacted] training needs.

As well as providing a high-class – and much needed – facility for our elite athlete community, we also firmly believe that the development would offer best-in-class infrastructure for the country's grassroots and recreational skiers and snowboarders, including some of our most promising athletes within the elite talent development pathway, as well as strengthening the opportunity to introduce more people to skiing and snowboarding who may otherwise not feel the sport is accessible to them. This is a particularly exciting aspect of the project's potential contribution, given its clear potential to attract new and diverse audiences to our sport.

The intended 400m elevation included within the plans is a crucial part of the development's appeal, not least as it opens the avenue to approval from the International Ski and Snowboard Federation (FIS) offering Britain a unique opportunity to host international snowsport competitions, and to develop a world class domestic competition and training environment.

We are also enthused by the prospect of the facility's potential positive environmental impact, notably in helping to reduce the level of international travel currently required for athletes training at the highest level of the sport. At present, most of our training needs are fulfilled in Europe, North and

South America, and Australasia. A domestic facility designed to a high-performance specification would instantly provide an alternative to a significant amount of our international training, and make a valuable contribution to reducing our sport's environmental impact. Indeed, with the effects of climate change already being felt in elite snowsport, opportunities to reliably train within the UK could not be more urgent.

Yours sincerely,

6th November 2023

Rhydycar West : Indoor Snow Facility
Development

Dear Leader/Officer,

I am writing to express my support as the for the
proposed development of the UK's premier indoor snowsports facility which will be the
most significant of its kind.

The development plans for Rhydycar West, incorporating the longest and largest Indoor
Snow Centre in the UK, will be game changing for sport in the UK and Wales and will bring
people from across the Europe to Wales to train and practice in the centre of excellence. As
the we have campaigned for this facility
for nearly a decade.

The centre will provide first class training and competition facilities and will be the UK
training headquarters for our athletes in the GB Ski and Snowboard and Paralympic teams,
in addition to providing an unprecedented opportunity to develop excellence for our Welsh
Teams. Currently the national teams must travel to Europe to train, incurring significant
travel costs and contributing to environmental impact due to numerous long-distance
journeys. The Snow Centre will also host national and international competitions attracting
participants from across the UK, Europe and worldwide, establishing Merthyr Tydfil and
Wales as a go-to destination.

With Welsh athletes currently competing and training at indoor snow facilities in Dubai,
Norway and various European venues, the value and impact of having a home based training
venue in terms of sustainability cannot be understated.

The facilities will provide boundless opportunities for the people of Wales to participate in
sporting activities. Through the provision of this facility anticipate a
significant increase in participation in Snowsports, realising some of the potential outlined in
the Schools Sports Survey Wales which identified a 21% latent demand (those who would
like to do more or take up Snowsports) in Snowsports. Additionally, the project will provide
regular coaching and instructor training opportunities, creating long-term employment.

I hope that you too are able to lend your full support to this project, and I look forward to
your thoughts on how you can support this development in helping this amazing
opportunity to come to fruition.

I would be delighted to discuss this project further at your convenience via a video call.

Kind regards,

Re: Rhydycar West

are the world's largest operator of indoor snow centres (based on area of indoor snow under management). We operate the majority of the largest snow centres in Europe and have over 25 years of successful operational experience in the indoor snow centre and leisure sectors.

We welcome the development of the Rhydycar West indoor leisure resort in Merthyr Tydfil, Wales which will incorporate the UK's longest indoor multi-run snow centre (at c.400m) as one of its anchor attractions.

We have collaborated extensively with Rhydycar West and their design and architecture team to work on the design and masterplan for Rhydycar West. In particular, the design work has focussed on integrating the most efficient operational concepts and considerations, especially energy efficiency; to create world class facilities coupled with exceptional customer experiences.

Our view is that the leisure resort will be a significant opportunity for Wales and the UK and we support the development proposals.

Yours sincerely,

[REDACTED]

Head of Planning and Regeneration
Merthyr Tydfil County Borough Council
Civic Centre, Castle Street
Merthyr Tydfil, CF47 8AN
Via email: ,

21st February 2024

Rhydycar West in Merthyr Tydfil reference P/23/0065

Dear Sir/Madam,

I would like to commend the Rhydycar West project and express my support for the numerous opportunities it presents for sport, recreation, and the local community.

From my 22-year experience as

I have seen the positive impact of similar leisure and snow dome complexes in many countries, where there are no or limited mountains and climatic conditions for snow.

The opportunities at Rhydycar West will facilitate access for everyone, providing a pathway to nurture talent for all ages and ability levels, alongside those who wish to enjoy recreational activity. Several world-class British and international athletes have learnt their trade in similar snow centres. As well as providing an enjoyable form of exercise for the local community and users, the Rhydycar West facilities will conform to the requirements to stage international competitions. Such events are important opportunities to obtain media coverage to promote the facilities and engage youngsters.

Furthermore, the exceptional fitness and other training facilities would enable many other Welsh sports teams to arrange training and preparation camps.

The Rhydycar West Project promises to be a transformative addition to the community, offering a myriad of benefits that will enrich the lives of the community, promoting health and well-being. The infrastructure is a catalyst for economic growth, generating employment opportunities, stimulating local businesses, and serving visitors to the area.

I wholeheartedly commend the Rhydycar West Project and wish you every success.

Yours sincerely

Planning Department
Merthyr Tydfil County Borough Council
Civic Centre
Castle Street
Merthyr Tydfil
CF47 8AN

Re: Planning Application for Rhydycar West Sports and Leisure Resort

Dear Sir/Madam,

My name is [REDACTED]. While my career as an [REDACTED] has taken me far from the valleys and streets of Merthyr Tydfil, this beloved town remains etched in my heart as my true home. I owe much of my resilience, passion, and character to the spirit of Merthyr, a place which, despite its challenges, continues to produce individuals of exceptional talent and determination.

I am writing to wholeheartedly express my support for the planning application for Rhydycar West, the envisioned world-class sports and leisure resort. I truly believe that this development presents an unparalleled opportunity for the town, ushering in not only economic benefits but also establishing Merthyr Tydfil as a focal point for sports and leisure activities in the region.

Having travelled extensively and witnessed the transformative impact of similar facilities in other regions, I am confident that Rhydycar West can serve as a catalyst for change. This isn't merely about sports or leisure but about reigniting a sense of community pride, offering our youth avenues for constructive engagement, and painting a promising picture of the future for all residents.

Additionally, beyond the evident recreational and sporting advantages, the resort promises to generate employment opportunities, encourage tourism, and spur associated economic activities, creating a ripple effect that would benefit the entire community.

In conclusion, I humbly urge the Planning Department to view this application not merely as a structural proposal but as an investment in the heart and soul of Merthyr Tydfil. It's about giving back to a community that has given so much to its people, including me. I am optimistic that with your support, we can collectively usher in a brighter, more prosperous chapter for our beloved town.

Thank you for your time and consideration.

Warmest regards,

[REDACTED]

1 February 2023

To whom this may concern,

We would like to record the support of [redacted] for the proposed Rhydycar West leisure resort development.

This new development will significantly benefit the local community and provide a much-needed boost to the local and regional economy. The resort's potential to attract over a million extra visitors to the region would present undeniable opportunities for our club members.

The Rhydycar West development is expected to bring many new jobs to the area, which will positively impact the local economy. This will help to boost local businesses and attract more investment to Merthyr Tydfil and the wider Heads of the Valleys area.

The resort will complement our golf club and provide additional opportunities for our members to enjoy their leisure time. We are excited about any potential collaboration between the Rhydycar West and our club, which will further enhance wellbeing in the community.

We strongly support the proposed new leisure resort and believe it will bring numerous benefits to Merthyr Tydfil and its residents.

We trust the planning application for this proposal is given careful consideration and acknowledges the positive and transformational impact it will have upon Merthyr Tydfil.

[redacted]

Subject: FW: Support Letter
Attachments: Letter Wales.pdf

From:
Sent: Wednesday, September 20, 2023 5:36 PM
To:
Cc:
Subject: Support Letter

Dear all,

On behalf of [Rhydycar West](#), I hereby send you the support letter regarding Rhydycar West.

Kind Regards,