

Planning, Design and Access Statement

Proposed Retail Store, Penydarren Social Club,
Merthyr Tydfil

August 2026

A decorative graphic consisting of a grid of colored squares in various shades of teal, blue, and dark blue, arranged in a pattern that resembles a staircase or a series of steps. The squares are of different sizes and are positioned in a way that creates a sense of depth and movement.

Turley

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1. Introduction

- 1.1 This Planning, Design and Access Statement has been prepared by Turley on behalf of MJD Commercial Limited ('the Applicant') in support of a full planning application for the development of land south of Alexandra Avenue, adjacent to Penydarren Social Club ('the Site'). The description of the proposed development is:

"Full planning application for the erection of a convenience store (Class A1) with associated parking, landscaping, and replacement parking provision to serve the adjacent social club"

- 1.2 The proposed development will provide a new A1 Use Class convenience store with associated parking, landscaping, in addition to replacement parking for the Penydarren Social Club. The site lies within the administrative boundary of Merthyr Tydfil County Borough Council ('the Council').

Supporting Documents

- 1.3 This Planning Statement should be read in conjunction with the following suite of detailed drawings and technical supporting documents submitted as part of the full planning application:

- Covering Letter prepared by Turley;
- Planning Application Form (including Certificates);
- Architectural Plans and Drawings prepared by Chamberlain Moss King Architecture;
- Noise Impact Assessment prepared by KR Associates (UK) Ltd;
- Phase 1 Habitats Survey prepared by Alder Ecology (UK) Ltd;
- Arboricultural Report, including Tree Survey, Tree Constraints Plan, and Arboricultural Impact Assessment prepared by ArbTS Ltd;
- Transport Statement prepared by Acstro Ltd; and
- Green Infrastructure Statement prepared by Catherine Etchell Associates.

- 1.4 Please refer to the covering letter for full details of application documents and plans.

Structure and Contents

- 1.5 The remainder of this Planning Statement is structured as follows:

- Section 2 provides an overview of the application site and surrounding context;
- Section 3 describes the relevant planning history of the site;

- Section 4 details the proposed development;
- Section 5 provides an overview of the relevant planning policy context;
- Section 6 evaluates the proposed development against the relevant planning policy context, with reference to supporting plans and technical documents submitted with the planning application;
- Section 7 sets out the benefits of the proposed development; and
- Section 8 summarises the key findings and conclusions in relation to the compliance of the proposed development with the adopted development plan and other material considerations.

2. Site and Surrounding Context

The Application Site and Surroundings

- 2.1 The site area extends to 1,870 sqm and lies within the existing built-up area of Merthyr Tydfil. It comprises an area of car park which currently serves Penydarren Social Club, to the east, as well as an area of undeveloped land along the eastern and southern boundaries of the site.
- 2.2 The character of the immediate area surrounding the site can be broadly described as residential, alongside associated land uses to serve the residential community such as schools and local green infrastructure. The site is located within walking distance (c.200m) to an existing commercial area, which includes light industrial uses, a fitness centre, car wash, children's indoor play area, café, and wellness studio. The site is also within walking distance (1km) of the Merthyr Tydfil town centre boundary as denoted on the Adopted Replacement LPD Proposals Map.
- 2.3 The site is bound by High Street to the south and Alexandra Avenue to the north and east. Directly to the west are existing residential dwellings. The site can be accessed from Alexandra Avenue via the existing car park entrance.
- 2.4 To the south and east, the site is bordered by dense trees, which also delineate the boundary with the highway. The residential properties to the south benefit from screening provided by the existing trees.
- 2.5 The site is relatively flat, with a general slope from east to south and the lowest point at the south western boundary. The site contains several existing trees located along the boundaries. The Arboricultural Report prepared by ArbTS Ltd identifies that no trees on site are subject to a Tree Preservation Order (TPO) and there are no TPO trees identified adjacent to the site boundary.
- 2.6 The Natural Resources Wales 'Flood Map for Planning' indicates that the site is located entirely within fluvial Flood Zone 1, indicating the lowest probability of flooding from rivers.
- 2.7 The existing vehicular point of access to the site is taken from Alexandra Avenue, leading directly into the existing car park. The development proposes that the existing vehicular access is retained, with new footpath provision proposed to enable pedestrian entry into the site. The site is located adjacent to two bus stops along High Street, which provide regular weekday and weekend access into the centre of Merthyr Tydfil.
- 2.8 The site is not located within or in immediate proximity to a defined Conservation Area and there are no designated heritage assets located within the site or the immediate vicinity. The closest built heritage asset is the Grade II listed 'Theatre Royal', which is c.420m to the south west of the site.
- 2.9 In terms of non-statutory historic assets, the site sits within the Urban Character Area (UCA 7), which means that it is subject to Policy CW1 of the LDP. The site is in close

proximity to the Archeologically Sensitive Area known as Penydarren Ironworks, which is situated c. 50 m to the south of the site.

- 2.10 The site is not allocated for any particular use within the adopted development plan.
- 2.11 The site is not subject to any other identified technical or environmental designations.

3. Planning History

3.1 From a review of Merthyr Tydfil Country Borough Council's online planning register, the site has been subject to two historic planning application as set out below:

- Extension to provide betting office/bookmakers (Ref: P/01/0105) – Approved in May 2001.
- Retention of a 2 m high security fence (Ref: P/96/0353) – Approved in October 1996.

3.2 Whilst not relating to the site itself, the most recent and relevant planning applications within the vicinity of the site are also outlined below:

Friendly Car Wash High Street Penydarren Merthyr Tydfil (Ref. P/17/0064)

3.3 Full planning permission for the retention of a covered canopy parking area, a storage container (to the rear of kiosk) and a flat roof Building Used as a café (A3 use class), was granted on 2 May 2017 (Ref. P/17/0064).

3.4 The development is located 180m from the site which currently operates as a car wash and 'snack bar' café.

Unit 1 & 2 Trevethick Trading Estate Penyard (Ref. P/14/0111 & P/14/0185)

3.5 Full planning permission for the change of use of an industrial unit (B2) to a children's indoor play area (D1) was granted on 23 July 2014 (Ref. P/14/0111).

3.6 Full planning permission for the change of use of an industrial unit (B2) to a fitness centre (D2) was granted on 8 September 2014 (Ref. P/14/0185).

3.7 The proposals are 350m from the site and are both located in Trevethick Trading Estate. They currently operate as a children's indoor play area, and a fitness centre.

4. The Proposed Development

- 4.1 This planning application seeks full planning permission for the following description of development:

“Full planning application for the erection of a convenience store (A1) with associated parking, landscaping, and replacement parking provision to serve the adjacent social club”.

- 4.2 The proposal utilises surplus land within the curtilage of the Penydarren Social Club, which is presently used as an informal parking area. Replacement parking is proposed to serve the social club, which will remain as existing. This development will assist in ensuring the future and long term viability of the club, whilst also delivering a new local convenience facility to serve the area.
- 4.3 The proposed development has been informed by a process of appraising site constraints and opportunities, including operator requirements and responding to relevant planning policy. The applicant has also had informal discussions with the Council.
- 4.4 Details of the proposed design and layout are summarised below, and further detail can be found in the full suite of architectural plans prepared by Chamberlain Moss King Architecture.

Proposed Design

Use, Design and Layout

- 4.5 The proposal will provide a 346 sqm retail unit designed to accommodate a convenience store, together with a loading area and service yard which meets the operational requirements for delivery vehicles. The proposal will also provide the necessary parking provision to serve the proposed store, together with replacement parking for the adjacent Penydarren Social Club.
- 4.6 The store building is set back from the site entrance allowing for convenient customer access from the parking court in the front, and efficient servicing via the proposed loading bay and service yard towards the rear of the site. The frontage of the site which faces Alexandra Avenue will be landscaped with new native tree planting, wildflower grassland and new hedge planting. This will provide visual and amenity benefits upon approach.
- 4.7 The proposed replacement parking for Penydarren Social Club will be located to the east of the clubhouse.
- 4.8 Overall, the proposal will provide an improved site entrance with dedicated pedestrian access into the site, improved landscaped amenity space at the frontage and an overall improved streetscape.

Height and Scale

- 4.9 The height of the proposed store is contextually driven, extending up to 7.7m from ground level, to compliment the adjacent social club and residential properties in the vicinity.
- 4.10 The scale and massing are also consistent with the adjacent social club, with consideration given to the relationship between the proposed store and residential properties to the rear of the site. As demonstrated on the submitted Elevation Drawing (Ref: N552 A005) the proposed store is in line with the height and scale of the neighbouring properties, avoiding any negative impact on their amenity as the store is oriented away from the buildings, avoiding any overlooking and maintaining adequate separation distances.

Parking and Access

- 4.11 Vehicular access to the site will be from Alexandra Avenue, retaining the existing access to Penydarren Social Club car park. The existing bell mouth provides generous room for vehicles to enter and leave the site with unrestricted visibility along Alexandra Avenue.
- 4.12 A new section of footpath will be constructed along the western side of the access leading to the store's entrance, via a crossing through the car park. This will connect to the existing 2m wide footway along Alexandra Avenue.
- 4.13 A total of 13 car parking spaces (including two accessible spaces) will be provided to serve the proposed store.
- 4.14 A total of 14 parking spaces will be provided as replacement parking for Penydarren Social Club, which will be located to the east of the social club building. This provision is lower than that recommended by CSS Wales Parking Standards (2014), which would require c. 100 parking spaces. The social club's operator has advised that the current 30 space car park has not been fully utilised for an extended period of time, with the site being located in a highly accessible location, benefitting from good pedestrian, cycle, and bus links. The provision of 14 replacement parking spaces is therefore deemed wholly adequate.
- 4.15 Cycle parking accommodating six bicycles will be provided to serve the social club, which currently does not benefit from any formal cycle parking. This will be provided in the form of three Sheffield stands.
- 4.16 The layout has been designed to ensure that the operational requirements of the occupier of the proposed store can be met. This has been tested through swept path analysis of an 8.4m long delivery lorry. Deliveries for the social club will continue to utilise the current arrangement, with the club's delivery vehicles to share the delivery area for the proposed store when reversing.
- 4.17 Detailed design rational for the parking and access arrangements, supported by relevant policy analysis, has been set out in the Transport Statement prepared by Acstro Ltd. This has been submitted as a supporting document accompanying this application. The Transport Statement should be read alongside the Demise Plan (ref: 105019 (90) 200 Rev G) and Proposed Site Layout (ref: N552 A003 Rev D).

Green Infrastructure and Drainage

- 4.18 The proposed landscape strategy has been designed to ensure that any loss of existing trees and vegetation is compensated for with new native trees and hedge to be planted, together with the re-use of existing wildflower grassland soils on site.
- 4.19 Opportunities have been taken to create habitat links between the proposed planting on site and the trees and scrub along the south east to western boundaries. This also provides a further habitat link to the adjacent wooded areas. New native planting will wrap around the site, infilling any gaps in the existing boundary vegetation and providing wildlife corridors.
- 4.20 Measures to ensure support for various species on site will be taken, with the proposed use of bird, and bat boxes, hibernacula for reptiles, a bee brick and insect hotel, and hedgehog house. The planting and wildflower grassland has been designed to encourage pollinating insects.
- 4.21 The proposal features multi-functional SuDS with surface water and roof water to be captured and drained into the proposed multiple rain gardens. Soils will be specified to ensure that plants grow in a moist but well drained rootzone, with water temporarily stored and then draining into pipes to be transported further down the drainage chain. This will provide additional amenity value and ensure sustainable and natural management of surface water on site.

Materials

- 4.22 The proposed store will feature a roof finished with Marley plain roof tiles, complemented by grey UPVC fascias (RAL 7016) and black UPVC rainwater goods, providing a contemporary appearance.
- 4.23 External walls will be constructed in red multi-facing brick, offering visual interest, texture and a traditional material that reflects the local context. The shopfront will comprise PPC aluminium-framed glazing creating an active frontage while ensuring a robust a finish.
- 4.24 To enhance the building's identity and introduce a natural element to the façade, cedar timber signage is proposed.
- 4.25 The materials are detailed on the Proposed Front Elevation (ref. N552 A005 Rev A), submitted for determination as part of this application.

5. Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. This section summarises relevant development plan policy and material considerations.

Adopted Development Plan

- 5.2 With respect to the application site, the Adopted Development Plan comprises:
- Future Wales – The National Plan 2040 (Future Wales) (February 2021); and;
 - Merthyr Tydfil Replacement Local Development Plan 2016-2031 (LDP).

Future Wales

- 5.3 Future Wales is the national spatial strategy for Wales. It seeks to focus on solutions to issues and challenges at a national scale. The plan sets national objectives and promotes a broad spatial strategy to achieve them. It is ambitious in key sectors including housing and economic growth, placemaking, well-being and quality of life, sustainability and renewable energy.
- 5.4 Policy 1 ‘Where Wales Will Grow’ identifies three National Growth Areas, where there will be growth in employment and housing. Cardiff, Newport and the Valleys, referred to as the South East Region, is identified as one of the three National Growth Areas.
- 5.5 Policy 2 ‘Shaping Urban Growth and Regeneration’ supports the regeneration and reuse of previously developed land, urban regeneration, making efficient use of land and infrastructure, and locating development within existing settlement boundaries.
- 5.6 Policy 6 ‘Town Centre First’ promotes a Town Centre First approach to the location of retail, commercial and community facilities. While the policy is primarily directed at significant developments serving a town, city or region, local planning authorities are encouraged to apply similar principles to smaller-scale proposals where appropriate, with particular regard to the integration of facilities within walkable, mixed-use neighbourhoods, especially within or adjacent to local centres. In the absence of a development plan allocation, proposals should be assessed using a sequential approach to ensure that opportunities within or adjoining centres are considered first.
- 5.7 Policy 33 confirms that within the South East region, Cardiff, Newport, and the Valleys will be the main focus for growth and investment, including strategic economic growth.

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

- 5.8 The Merthyr Tydfil Replacement Local Development Plan is the principal local planning policy document for Merthyr Tydfil County Borough. It was adopted on 29 January 2020 and covers the period up to 2031.

- 5.9 The Vision of the LDP is centred on supporting regeneration, encouraging sustainable population growth, and improving quality of life, whilst protecting the area's environmental, cultural and heritage assets. The Plan seeks to strengthen Merthyr Tydfil's position as a regional centre while balancing economic, social, cultural and environmental priorities. The LDP focuses on directing development to sustainable and accessible locations, supporting investment and job creation, enhancing and protecting existing local services and community facilities, and ensuring that development contributes to the long-term vitality and resilience of communities.
- 5.10 Some of the key priorities which relate to the principle of development are set out below:
- Promoting the suitable reuse of previously developed land and the continued regeneration of local communities (LDP Objective 4, Figure 2, page 9).
 - Ensuring that new development is accessible by walking, cycling and public transport links (LDP Objective 5, Figure 2, page 9).
 - Promoting high quality sustainable and inclusive design, and support measures which mitigate the predicted effects of climate change (LDP Objective 6, Figure 2, page 9).
 - Supporting existing community facilities ((LDP Objective 8, Figure 2, page 9).
 - Providing and safeguarding appropriate land for economic and skill development (LDP Objective 12, Figure 2, page 9).

Land-Use and Site Specific Policies

- 5.11 **Policy SW4 'Settlement Boundaries'** seeks to direct development toward the existing urban areas, support the re-use of previously developed land, and to protect the functioning of the rural economy and countryside. The settlement boundaries for Merthyr Tydfil are defined as the 'Primary Growth Area' which is a key area for growth. Outside of the settlement boundaries, development is restricted to proposals detailed in the policy, including relating to agriculture or forestry, rural infrastructure, affordable housing and recreation.
- 5.12 **Policy CW1 'The Historic Environment'** seeks to ensure that the County Borough's historic environment is conserved and enhanced. Development proposals must demonstrate that they preserve or enhance the architectural quality, character, and historic or cultural significance of designated heritage assets. The policy also requires appropriate regard to be given to the special character and archaeological importance of undesignated heritage assets, including locally listed buildings, historic landscapes, urban character areas and archaeologically sensitive areas.
- 5.13 **Policy EcW3 'Retail Hierarchy Supporting Retailing Provision'** seeks to direct retail, leisure and other complementary development to established centres, with Merthyr Tydfil Town Centre identified as the preferred location at the top of the retail hierarchy, followed by a network of local centres across the County Borough. For development proposed outside designated centres, applicants must satisfy the sequential test and

show that the proposal would not adversely affect the vitality and viability of existing town or local centres. Policy justification text states that where retail development is proposed outside of a centre, a retail impact assessment will be required on all applications of 2,500 sqm or more gross floorspace. An impact assessment may be required from smaller development proposals proportionate to the potential impacts. This proposal falls well below this threshold, and the Council has confirmed that no impact assessment is required.

- 5.14 **Policy SW13: 'Protecting and Improving Local Community Facilities'** supports the provision of new and improved community facilities and seeks to protect existing facilities that serve local communities. The policy resists the loss of community facilities unless equivalent replacement provision is available nearby, the facility is demonstrated to be surplus to community requirements, or there is no longer a viable community use for the site. This reflects the Council's objective of maintaining and enhancing access to services and facilities that support sustainable and inclusive communities. This proposal seeks to ensure that the facilities provided at the social club can continue to serve the community and secure their long term future.

Other Material Considerations

Second Merthyr Tydfil Replacement Local Development Plan 2026-2041

- 5.15 The Council has commenced preparation of a Second Replacement Local Development Plan for the period 2026-2041, following a review of the adopted Replacement LDP 2016-2031.
- 5.16 At present, the emerging plan remains at an early stage, with evidence gathering and stakeholder engagement process expected to extend into 2027 and inform future strategy and site allocation decisions. Adoption of the Second Replacement LDP is anticipated for 2030.

Planning Policy Wales 12 (updated July 2024)

- 5.17 PPW (Edition 12) sets out the overarching land use planning policies for Wales.
- 5.18 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as set out by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015.
- 5.19 **Chapter 3: Strategic and Spatial Choices**, promotes a sustainable, placemaking-led approach to development and seeks to direct growth to locations which make best use of existing infrastructure, services and public transport networks. The chapter advocates the efficient use of land through the site search sequence, prioritising the redevelopment of suitable previously developed land within existing settlements.
- 5.20 **Chapter 4: Active and Social Places** promotes a "Town Centre First" approach to retail development whilst recognising the important role that local shopping facilities play in supporting sustainable and resilient communities. The key themes relating to retail development are as follows:

5.20.1 **Retail Needs Test:** PPW requires retail proposals outside established centres to demonstrate a need for additional retail provision, which may be quantitative or qualitative in nature. The guidance recognises the importance of ensuring communities have access to adequate retail facilities and supports proposals that address identified gaps in provision and enhance accessibility to day-to-day shopping opportunities. Qualitative Assessments may become an important consideration where they show that the proposal contributes to a reduction in car journeys, is highly accessible by walking, cycling and public transport, supports the objectives and retail strategy of the LDP and national guidance, addresses locally defined deficiencies in provision in terms of quality and quantity, and where it alleviates a lack of convenience goods provision in a disadvantaged area.

5.20.2 **Sequential Test:** PPW requires a sequential approach, with retail development to be directed firstly to sites within designated town and local centres, followed by edge-of-centre locations and, only where suitable and available sites cannot be identified, to out-of-centre locations. Applicants are required to demonstrate that in-centre and edge-of-centre opportunities have been thoroughly assessed before out-of-centre sites are considered. Any out-of-centre development should be accessible by a range of transport modes and must not undermine the vitality, attractiveness or viability of existing centres or prejudice the retail strategy of the development plan.

Technical Advice Notes (TANs)

5.21 The following technical advice notes are also considered relevant to the determination of the planning application:

- TAN11: Noise
- TAN12: Design
- TAN15: Development and Flood Risk
- TAN18: Transport
- TAN23: Economic Development

Supplementary Planning Guidance Notes (SPGs)

5.22 The Council has also published a number of supplementary planning guidance documents that are relevant to the determination of the application, including:

- Guidance Note No. 2 - Planning Obligations
- Guidance Note No. 3 - Shopfront Design
- Guidance Note No. 4 - Sustainable Design
- Guidance Note No. 5 - Nature and Development

The Wellbeing of Future Generations (Wales) Act (2015)

- 5.23 The Act defines sustainable development in Wales and underpins national planning policy objectives. It addresses the needs of a more diverse population and larger aging demographic by providing requirements related to the integration of services, embedding social cohesion, and encouraging a sense of belonging.
- 5.24 The Act is centred on seven Well-being Goals:
- A Prosperous Wales;
 - A Resilient Wales;
 - A Healthier Wales;
 - A More Equal Wales;
 - A Wales of Cohesive Communities;
 - A Wales of Vibrant Culture and Thriving Welsh Language; and
 - A Globally Responsible Wales.
- 5.25 These goals seek to ensure that development contributes positively to sustainable economic growth, access to services and facilities, community well-being, environmental stewardship, social inclusion and the long-term resilience of places.

6. Planning Assessment

- 6.1 This section provides an assessment of the proposed development against the relevant planning policy context and draws on conclusions of the technical findings which have informed the design and layout of the scheme.

Principle of Development

- 6.2 The site is situated in an area of established commercial activity and is identified in the Council's Renewable Energy Assessment as a 'local activity cluster'. It is located in an accessible location, and the new development will ensure the long term viability of an existing Social Club, an important local community facility.
- 6.3 The site is within the settlement boundary where development is permitted subject to the proposals compatibility with other plan policies and material considerations (Policy SW4).
- 6.4 Policy **EcW3** states that proposals for retail development on new sites or existing retail areas in out-of-town locations will only be permitted where compliance with the key retail policy tests is demonstrated. This proposal falls well below the threshold for an assessment of need or retail impact, and the Council has confirmed that no impact assessment is required.
- 6.5 With regards to the sequential assessment, an assessment has been undertaken of available, suitable and viable sequential sites which could potentially accommodate the proposal. This is included at **Appendix 1**.
- 6.6 The sequential assessment did not find any suitable and/or available land or units within the search area. It is acknowledged that a small number of units did meet some of the specified criteria, for example in relation to size, but did not have, for example, the ability to accommodate additional parking or servicing.
- 6.7 Siting the proposal in an alternative location also does not assist in the objective of securing the long term future of the social club in this established location, which is a valid material consideration.
- 6.8 Taking the above into consideration the proposal is considered to be in accordance with Policies EcW3.

Economic, Social and Environmental Benefits

- 6.9 TAN 23 defines economic development broadly so that it includes any form of development that generates wealth, jobs and income. TAN 23 states the economic benefits of proposals and market needs should be fully considered when determining planning applications (paragraphs 1.2.1-2).
- 6.10 PPW and Future Wales recognise the role that retailing plays in supporting the economy. In PPW economic development is defined as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes (paragraph 5.4.1).

- 6.11 Future Wales specifically supports the foundational economy of which retail forms a part (page 14). The development is proposed on a highly accessible site and would result in its favourable regeneration to provide appropriately scaled economic development, which would create new local employment opportunities. The contribution that the application proposals will make to the local and wider economy should therefore be given weight in the determination of this planning application.
- 6.12 As mentioned, the proposal will also help secure the long term future of the Social Club and its existing operation which already makes a valued contribution to the local economy.

Design and Layout

- 6.13 The design of the development has been developed in response to the site's context and its relationship with the surrounding suburban environment. Informed by a comprehensive suite of technical assessments, the development represents a high-quality design solution that integrates sensitively and positively with its setting.
- 6.14 Policy **SW11** (Sustainable Design and Placemaking) requires developments to be appropriate to their local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form and density. It also requires integration with adjacent spaces, the public realm and historic environment to enhance the street scene, while avoiding any negative impact on local amenity.
- 6.15 The proposal will deliver a contemporary neighbourhood convenience store, which will provide a welcoming active frontage through the use of a glass shopfront façade. A robust and contextually sensitive material palette has been selected, drawing inspiration from local character and referencing materials seen in throughout the Urban Character Area (UCA 7) such as red multi-facing brick and traditional pitched roof design. This is combined with grey UPVC fascias (RAL 7016), black UPVC rainwater goods, and cedar wood signage adding a contemporary feel. The height and massing are contextually driven, with the proposed store extending up to 7.7m in height, to compliment the adjacent social club and residential properties in the vicinity. The development is therefore in accordance with Policy **SW11**, as it draws on its local context, while utilising contemporary materials and design principles which enhance the street scape by redeveloping an existing car park.
- 6.16 Policy **CW1** (Historic Environment) requires appropriate regard to be given to the special character and archaeological importance of undesignated heritage assets, including urban character areas. The development accords with Policy **CW1** as the scale of proposed design is clearly related to the existing character of the surrounding area, especially the adjacent social club, with materials reflecting those used throughout the Urban Character Area (UCA 7) within which the site is located.

Trees and Landscaping

- 6.17 An Arboricultural Report has been prepared by ArbTS Ltd in support of the development. The report contains a Tree Survey of the site, together with a Tree Constraints Plan, an Arboricultural Impact Assessment and Tree Protection Plan.
- 6.18 The Tree Survey, undertaken with the benefit of a topographical survey, identified four individual trees and three tree groups, within and adjacent to the site as shown on the

accompanying Tree Constraints Plan. The surveyed trees and tree groups were assessed as either Category B (moderate quality) or Category C (low quality).

- 6.19 The Arboricultural Impact Assessment confirms that the proposed development will result in limited tree loss, comprising the removal of two individual trees and part of a low-quality tree group. To facilitate the revised social club parking arrangement, approximately 320 sqm of low quality scrub will also be removed. This will be compensated through the planting of new oak trees and hedgerows, while existing wildflower soils will be retained and enhanced with additional plug planting. A Tree Protection Plan has been prepared, identifying the required vegetation removal and setting out measures to ensure retained trees are protected throughout the construction phase.
- 6.20 A Landscaping Strategy has been prepared by Catherine Etchell Associates as part of the 'Landscape Strategy, Biodiversity Enhancement Plan and Green Infrastructure Statement'. The proposed landscaping has been carefully designed to enhance the appearance of the site and strengthen its relationship with the surrounding area. Emphasis has been placed on the site frontage and entrance areas, which are most visible from Alexandra Avenue and neighbouring residential properties.
- 6.21 The proposed landscape strategy will incorporate at least six new trees which will help soften and balance the scale of the existing and proposed buildings, hedgerows which will soften the views from the public highway, wildflower plug plants, and landscaped embankments throughout the scheme. There will also be multiple rain gardens, providing a multifunctional drainage feature which also adds to the visual amenity of the site.
- 6.22 Policy **EnW5** (Landscape Protection) is the primary policy within the LDP which deals with arboriculture and landscaping. It seeks to ensure that development proposals do not cause unacceptable harm to the character, quality, distinctiveness or visual amenity of the landscape, and that the County Borough's valued landscape features and settings are protected and, where appropriate, enhanced.
- 6.23 Overall, the development will deliver a high-quality landscaped frontage along Alexandra Avenue, together with additional planting within embankments, and around the store entrance. While the development necessitates the removal of a limited number of trees and areas of low-quality vegetation, these losses are appropriately mitigated through new tree, hedgerow and biodiversity planting, resulting in a more attractive and well-structured landscape setting. The proposal therefore accords with Policy **EnW5** contributing positively to local character and visual amenity through the creation of an attractive, welcoming and safe environment.

Ecology and Biodiversity

- 6.24 A Phase 1 Habitat Survey was undertaken by Alder Ecology UK Ltd to identify any ecological constraints associated with the site at the time of survey. The assessment considered the presence of protected species (or habitats with the potential to support such species), together with the location of any habitats or areas of ecological value.
- 6.25 The Phase 1 Habitat Survey confirms that the site comprises predominantly improved grassland and scattered trees of low ecological value, with no priority habitats present,

and no further protected species surveys required. As the site lies within a Buglife B-Line corridor, the proposed landscaping includes insect-friendly trees, shrubs and wildflower planting to enhance biodiversity and strengthen habitat connectivity.

- 6.26 The survey also sets out that, whilst there are protected habitats within the wider 5km area and records of protected species within 2km of the site, the nature and scale of the development mean that no direct or indirect impacts are anticipated, subject to the implementation of appropriate ecological safeguards during construction.
- 6.27 Policies **EnW2** (Internationally and Nationally Protected Sites and Species) and **EnW3** (Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species) seek to protect internationally and nationally designated nature conservation sites and protected species from adverse effects arising from development, ensuring that ecological interests of recognised importance are conserved and enhanced where appropriate.
- 6.28 The development will not result in any adverse effects on protected habitats or species, none of which are present within the site itself. Accordingly, the development does not trigger the provisions of Policy **EnW2** or Policy **EnW3**.
- 6.29 A 'Landscape Strategy, Biodiversity Enhancement Plan and Green Infrastructure Statement' has been prepared by Catherine Etchell Associates, in support of application. The document demonstrates that the development will deliver a comprehensive green infrastructure strategy that enhances biodiversity, ecological connectivity and the site's resilience to climate change. Guided by the DECCA framework (Diversity, Extent, Condition and Connectivity), the landscaping scheme incorporates layered, pollinator-friendly planting, including native wildflowers, together with native hedgerows and trees selected to reflect local landscape character and the local climates across the site.
- 6.30 Key habitat enhancing measures include the provision of hibernacula to support reptiles, a bat box, bee bricks, insect hotel, bird box and hedgehog house. These features will be integrated within a wider landscape framework of native planting and species-rich wildflower grassland. Collectively, the measures will create a connected habitat network across the site, linking with existing habitats and ecological corridors in the surrounding area. The development will strengthen connections to the Buglife B-Line corridor, enhancing on-site biodiversity while making a positive contribution to the wider ecological network, in accordance with Policy **EnW1**, which seeks to maintain and enhance biodiversity and ecosystem resilience.
- 6.31 Policy **SW11** (Sustainable Design and Placemaking) seeks to ensure that development incorporates high-quality green infrastructure, protects and enhances biodiversity, strengthens ecological connectivity, and contributes positively to ecosystem resilience through the delivery of well-designed and multifunctional landscapes.
- 6.32 Overall, the development is in accordance with Policy **SW11**. The development will provide a high-quality network of green infrastructure, incorporate sustainable drainage measures including rain gardens, and contribute to a well-connected and multifunctional green infrastructure network across the County Borough. The development also supports the national policy objective of building ecosystem resilience whilst delivering

sustainable development, as set out in national policies and guidance in the form of Future Wales and PPW (Edition 12).

Transport and Highways

- 6.33 A Transport Statement has been prepared by Acstro LTd to support the development. The development will provide 13 car parking spaces (including two accessible spaces) to serve the store, together with 14 replacement car parking spaces to serve the existing Penydarren Social Club. A total of three Sheffield stands will be provided to serve the social club, totalling six cycle spaces.
- 6.34 Policy **SW12** (Improving the Transport Network) supports development proposals which will encourage a modal shift towards sustainable transport, with proposals expected to demonstrate how they will reduce the need to travel and encourage the use of sustainable transport.
- 6.35 The Transport Statement confirms the site's highly sustainable location which is particularly suitable to the proposed use. The proposed store would be highly accessible via active travel modes from the surrounding residential areas, with the application site being well connected to the existing and proposed active travel routes within a 2km / 30-minute catchment, as seen on the Active Travel Map of the area (Figure 4 on page 7 of the Transport Statement). The site is also highly accessible via established public transport links, with an hourly bus service (33) available from the bus stop opposite the site, and multiple frequent bus services available from the High Street approx. 120m from the site.
- 6.36 The Transport Statement highlights the lack of existing convenience store provision in the area, which is predominantly residential. The report concludes that proposed store would enable local residents to reduce vehicular trips generated to access comparable existing services by reducing the need to travel beyond the typical walking and cycling distances set out in The Welsh Government's Active Travel Act Guidance (2021).
- 6.37 With regard to the above, the proposal accords with Policy **SW12**. By introducing a neighbourhood convenience store within a highly accessible location, the development will help reduce the need for residents to travel longer distances to access day-to-day services and will encourage journeys by walking, cycling and public transport. The proposal benefits from strong active travel and public transport connections and therefore supports a modal shift away from private car use, contributing positively to the creation of a more sustainable and integrated transport network.
- 6.38 Policy **SW11** (Sustainable Design and Placemaking) requires development proposals to demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and comply with the Council's parking standards. It is important to note that the Council has not adopted any parking standards since the adoption of the LDP, therefore the relevant standards are the CSS Wales Parking Standards (2014) which are set out on page 4 of the Transport Statement.
- 6.39 The car parking provision of 13 spaces (including two disabled spaces) which will serve the proposed store accords with the CSS Wales Parking Standards (2014). Whilst the proposed car parking provision of 14 replacement spaces which will serve the social club falls short of the requirements, the social club is in a highly accessible location which

benefits from multiple frequent bus services. The operator of the social club has advised that the existing 30 space car park already has surplus spaces and rarely fully utilised. The proposal will also provide six cycle parking spaces, which will serve the social club and encourage active travel to access the social club. Details of the parking provision are set out in the Transport Statement.

- 6.40 Vehicular access to the development will be retained via the existing access to Penydarren Social Club car park. A new section of footpath will be constructed along the western side of the access leading to the store's entrance, via a crossing through the car park and connecting to the existing 2m wide footway along Alexandra Avenue. The Transport Statement confirms that the proposed access arrangements will be safe and suitable for the operational needs of the occupiers of both the store and the social club, which has been shown through swept path analysis confirming that the appropriate service vehicles can be safely and effectively accommodated within the proposed layout.
- 6.41 Analysis of local road safety data shows no existing or potential highway safety issues that the development would be exacerbated by the proposed development. Trip generation forecasts indicate a limited increase in traffic, with the proposal expected to generate approximately 38-52 vehicle movements during peak hours. However, most of these trips are anticipated to be pass-by or diverted trips already using the highway network. Only around 4-5 peak-hour vehicle movements are expected to be new trips, and the overall impact on the surrounding highway network is therefore not considered significant.
- 6.42 With regard to the above, the proposal is clearly in accordance with Policies **SW11** and complies with national transport policies and guidance in the form of Future Wales, PPW (Edition 12) and TAN18 as it will not create unacceptable impacts on the local highway network, while providing a safe access for both pedestrians and vehicles.

Drainage Strategy

- 6.43 Policy **SW11** is the only policy of the LPD which relates to drainage, requiring developments to contribute to the provision green infrastructure, including the use of sustainable drainage systems (SuDS) where appropriate. It also seeks for development to incorporate measures to improve ground and surface water quality wherever possible.
- 6.44 The site is located entirely within fluvial Flood Zone 1, indicating the lowest probability of flooding from rivers and therefore does not require any mitigation as set out in national guidance (TAN15). The site is impacted by surface water Flood Zones 2 and 3, albeit this is localised to a small area along the northern boundary of the site and will be managed through the use of SuDS.
- 6.45 It is proposed to provide attenuation storage (designed for the 1 in 100 year 30% climate change storm event) and discharge the surface run-off to the culverted watercourse that runs through the site, at the brownfield Qbar rate of run-off, with 30% betterment.
- 6.46 Attenuation storage will be provided by permeable paving construction and/or cellular storage.

- 6.47 The use of permeable paving also satisfies water quality requirements by the inherent treatment of hydrocarbons and the filtering of silt. SAB approval will be obtained for the surface water system.

Noise

- 6.48 KR Associates (UK) Ltd has been appointed to carry out a Noise Impact Assessment for the development. An environmental noise survey has been carried out to determine if the plant associated with the proposed convenience store would have a significant adverse impact in the local properties.
- 6.49 Policy **EnW4** (Environmental Protection) seeks to ensure that development proposals safeguard environmental quality and avoid unacceptable adverse impacts on people, biodiversity, natural resources and ecosystems, including through the prevention and mitigation of pollution and other environmental harm such as noise.
- 6.50 The Noise Impact Assessment considers the potential impact of noise from the proposed plant equipment on nearby residential properties. The closest dwelling is 31 Briarmead, which is located approximately 31-35 metres from the proposed dedicated plant area. The assessment confirms that noise from the proposed packaged refrigeration unit and two air source heat pumps would remain below existing background noise levels when assessed in accordance with national industry standards. The equipment has been specifically selected to meet the Council's acoustic requirements and to minimise the potential for disturbance.
- 6.51 The findings presented in the Noise Impact Assessment demonstrate that the proposal would not have an adverse impact on the amenity of neighbouring occupiers and is fully compliant with Policy **EnW4** relating to noise and residential amenity, PPW (Edition 12) Chapter 6, and TAN11 (Noise).

7. Benefits of the Development

7.1 The proposal represents sustainable development that will result in several site-specific benefits. These include:

- **Securing the long term future of the Penydarren Social Club in its established location.** The development will provide replacement parking provision and unlock investment, which will support the ongoing operation and long term viability of the social club, safeguarding a community facility which makes a valuable contribution to the local area.
- **Creation of local employment opportunities.** The proposed convenience store will generate new employment opportunities for local residents and contribute to the local economy through expenditure in the local area.
- **Regeneration of underutilised car park and enhancement of local streetscape.** The development will bring an area of surplus and underutilised previously developed land into productive use. It will deliver a well-designed retail development, which improves the visual amenity of the site through new landscaping, the use of high-quality materials and creation of a welcoming new frontage onto Alexandra Avenue.
- **Improved access to day-to-day retail facilities in local area.** The development will provide a neighbourhood convenience store within the walking distance catchment of a significant number of residential properties. This will address a limited level of comparable convenience retail provision locally and improve access to essential goods and services without the reliance on private vehicles.
- **Improved pedestrian connectivity and a more attractive street frontage.** The development will introduce dedicated pedestrian access from Alexandra Avenue, creating a safer and more legible route into the site while enhancing activity, accessibility and natural surveillance at the site frontage
- **Delivering biodiversity and green infrastructure enhancements.** The development will provide a comprehensive package of ecological enhancements including native tree and hedgerow planting, species-rich wildflower areas, rain gardens and dedicated habitats for birds, bats, reptiles, pollinators and hedgehogs, resulting in a significant improvement over the site's existing ecological value.
 - **Provision of new sustainable drainage infrastructure.** The incorporation of multifunctional SuDS features, including rain gardens, will provide a sustainable approach to surface water management while also delivering visual, ecological and placemaking benefits across the site.

8. Summary and Conclusions

- 8.1 The proposed development will deliver a new neighbourhood convenience store, associated parking, landscaping and replacement parking provision for Penydarren Social Club on underutilised land within the settlement boundary of Merthyr Tydfil. The scheme represents a sustainable form of development in a highly accessible location and will support the continued operation and long-term viability of an important community facility.
- 8.2 The development accords with Future Wales by promoting the efficient use of land within an existing urban area and delivering investment within a recognised regional growth area. It also aligns with PPW (Edition 12) by providing local retail provision in a sustainable location that is accessible by walking, cycling and public transport.
- 8.3 At the local level, the development complies with Policy **SW4**, as it is located within the settlement boundary, and Policy **EcW3**, with the sequential assessment demonstrating that no preferable suitable and available sites exist. The proposal will support the future of Penydarren Social Club in accordance with Policy **SW13**, whilst delivering economic benefits through job creation and investment.
- 8.4 The design, scale and appearance of the development respond positively to the site's surroundings and accord with Policies **SW11** and **CW1**. The proposal will also deliver biodiversity enhancements, green infrastructure improvements, sustainable drainage measures and safe access arrangements, in accordance with Policies **EnW1**, **EnW5**, **SW11** and **SW12**.
- 8.5 The supporting plans and reports submitted alongside the planning application demonstrate that there are no environmental or technical constraints to developing the site, which cannot otherwise be mitigated through the proposed development.
- 8.6 In view of the above, the proposed store represents positive sustainable development that will contribute to the regeneration and long term economic prosperity of the area. The development accords with the adopted LDP when read as a whole, as well as national planning policy and guidance and therefore planning permission should be granted without delay.

Appendix 1: Sequential Assessment

Land at Penydarren Social Club, Merthyr Tydfil

August 2026

Context

1. The sequential approach requires applications for 'main town centre uses' such as Class A1 retail uses to be located in town centres, then in edge-of-centre locations. Only if suitable sites are not available should out-of-centre sites be considered. For retail purposes, edge-of-centre sites are within easy walking distance (i.e. up to 300 metres) of the primary shopping area.
2. The general requirements of the sequential approach to site selection are set out at paragraphs 4.3.18 to 4.3.24 of PPW12. In summary, the sequential approach requires that all potential suitable and available town centre options, and then edge of centre options, are thoroughly assessed before out-of-centre sites are considered for key town centre uses. The approach requires pragmatism and flexibility from local planning authorities, developers and retailers alike. The onus of proof that more central sites have been thoroughly assessed rests with the developer.
3. Key considerations in carrying out a sequential assessment of each potential site include:
 - The likelihood of the site becoming available within a reasonable period of time;
 - Suitability of the site for the proposed development; and
 - Viability for the proposed use.
4. This section of the report details the applicant's consideration of sequential site assessment in the context of the proposed development.

Assessment

5. We have conducted a sequential site search of Merthyr Tydfil Town Centre and a 200 to 300m search from the town centre boundary (edge of centre) to ascertain whether there are any potentially suitable and available sites which could accommodate the proposed development.
6. Bearing in mind the need for flexibility, the physical requirement to meet the needs of the proposed development have been taken to be:
 - A site area of at least 0.20 ha that can accommodate a convenience store with a GIA of at least 346 sqm;

- A site capable of accommodating adequate access arrangements;
- A site capable of accommodating adequate and adjacent vehicle parking arrangements;
- A site that can allow for the safe manoeuvring of customer access and deliveries;
- The site must be prominent to attract custom or else there is no commercial rationale for the development; and
- A site that is easily accessible by a choice of means of transport.

7. The locations where we have identified sites to possibly accommodate the proposed development are listed, below.

- Former St Tydfils Hospital
- Former Ysgol Santes Tydfil Site
- Vacant Land on Brecon Road
- Merthyr Tydfil Town Centre – Vacant Units

Former St Tydfils Hospital Site

8. The site is a 2.43 hectare site located directly adjacent to the Merthyr Tydfil Town Centre boundary and is allocated for 50 dwellings (Policy SW3.21). The site is therefore being actively promoted for housing and it therefore cannot be considered to be available for the development proposed. Planning permission has been granted for a residential development called 'St Tydfil's Grove' (P/20/0199) and the development is being actively promoted for sale.

Former Ysgol Santes Tudful Site

9. The site extends to 0.78 ha and located on Queens Road, c.240m East of Merthyr Tydfil Town Centre boundary. The site is currently a brownfield site and is allocated for 20 dwellings (Policy SW3.23). There have been several planning applications approved for residential development, including an outline permission approved in May 2019 under ref. P/18/0242 and a reserved matters permission for 10 dwellings approved in May 2023 under ref. P/21/0338.
10. The site is also being marketed as a 10 dwelling development named 'The Gorsedd'. This suggests that the site is unavailable. As above, the site also lacks a main road frontage. Accordingly, the site is unavailable and has been discounted from the sequential search.

Vacant land, Brecon Road

11. This vacant site is located approximately 150 m to the north of the town centre boundary. It only extends to 343 sq m in total, and would be unable to accommodate the proposed development and the associated parking and access requirements. Planning permission was approved in September 2023 under ref. P/23/0141 for the erection of a pair of semi detached dwellings. The site is also located on a through residential road and lacks the prominence required. Therefore,

this plot of land is both unsuitable and unavailable to accommodate the proposed development and can be dismissed from the sequential search.

Vacant town centre units

12. At the time of our survey in August 2026, there were 23 vacant units within the extent of the centre outlined in the Merthyr Town Centre Boundary Plan.

Address	Unit Size (sq m)	Commentary
30 Bolgoed Place	40	Too small. Unsuitable.
29 Penydarren Street	100	Too small, not being marketed as available. Unsuitable and unavailable.
Former Theatre Royal, Penydarren Road	193	No permitted retail use, Listed Building, too small. Unsuitable. Unviable.
57 High Street	143	Too small. Unsuitable.
Wesley Chapel, 13 Pontmorlais, High Street	408	No retail use permitted. Unsuitable.
91 High Street	209	Vacant restaurant, no retail use. Unsuitable.
3-4 Pontmorlais, High Street	152	Too small. Unsuitable.
5 Pontmorlais, High Street	56	Too small. Unsuitable.
6-7 Pontmorlais, High Street	55	Too small. Unsuitable.
9b Pontmorlais, High Street	93	Too small. Unsuitable.
92-94 High Street	348	Vacant PH/Restaurant. No retail use permitted. Unsuitable.
86 High Street	40	Too small. Unsuitable.
1A John Street	191	Too small. Unsuitable.
3 St Tydfil Shopping Centre	212	Too small. Unsuitable.
10-11 St Tydfil Shopping Centre	274	Too small. Unsuitable.

Address	Unit Size (sq m)	Commentary
14 St Tydfil Shopping Centre	114	Too small. Unsuitable.
17 St Tydfil Shopping Centre	128	Too small. Unsuitable.
9 St Tydfil Shopping Centre	194	Too small. Unsuitable.
16 St Tydfil Shopping Centre	132	Too small. Unsuitable.
136A High Street	129	Too small. Unsuitable.
Unit 9, M Beacons Place	75	Too small. Unsuitable.
5 New Market Walk, St Tydfil Shopping Centre	212	No primary frontage, no servicing area or dedicated parking. Unsuitable.
9a Graham Way, St Tydfil Shopping Centre	290	Too small, no dedicated parking or servicing.

13. The sequential search has identified no sites which can be considered available, suitable, and viable sequentially preferable alternatives in respect of the proposed development, even when allowing for flexibility. The proposed development is considered, therefore, to fully accord with local and national policy and guidance with respect to the sequential approach.

August 2026

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