

INTERNAL MEMORANDUM

To: Kate Glover - Development Control Case Officer
Reference: P/25/0231

From: Planning Policy and Implementation Section
Ask for: David James
Extension: 7053

Date: 2nd September 2025

Summary

Concerns raised. The development could result in a mix and density of development inappropriate to its local context (Policy SW11), and could result in a level of activity, noise, loss of privacy, anti-social behaviour, and traffic movements, which would unacceptably impact local amenity and highway safety, contrary to LDP Policies SW11 and EnW4.

The accessibility of the application site, along with its proximity to services and amenities, and the availability of public transport should be carefully considered (Policy SW12).

Observations in respect of the above proposal

1. Proposed Development

An application for the change of use from a 3-bedroom dwelling (C3 use) to a 4-bedroom House of Multiple Occupation (HMO) (C4 use class), at 3 Eastfield Place, Plymouth Street, Merthyr Tydfil.

2. Development Plan Framework

The existing development plan framework in Merthyr Tydfil is provided by:-

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

The relevant LDP Objectives are:-

- *LDP Objective 1 Sustainable Population Growth: To encourage a sustainable level and distribution of population growth.*
- *LDP Objective 2 Welsh Language and Culture: To protect and enhance Welsh language and culture.*
- *LDP Objective 3 To ensure the sufficient provision of land for the delivery of a range and choice of housing and affordable housing to address local housing needs.*

- *LDP Objective 4 Regeneration: To promote the suitable reuse of previously developed land and the continued regeneration of local communities.*
- *LDP Objective 6 Sustainable Design: To promote high quality, sustainable and inclusive design and support measures which mitigate the predicted effects of climate change.*
- *LDP Objective 7 Transport: To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links.*
- *LDP Objective 9 Heritage and Cultural Assets: To protect, enhance and promote all heritage, historic and cultural assets.*
- *LDP Objective 10 Biodiversity: To improve ecosystem resilience and connectivity which support habitats and species of principle importance.*

The following development plan policies would apply:-

- *Policy SW1: Provision of New Homes*
- *Policy SW2: Provision of Affordable Housing*
- *Policy SW3: Sustainably Distributing New Homes*
- *Policy SW4: Settlement Boundaries*
- *Policy SW9: Planning Obligations*
- *Policy SW11: Sustainable Design and Placemaking*
- *Policy SW12: Improving the Transport Network*
- *Policy CW1: Historic Environment*
- *Policy EnW1: Nature Conservation & Ecosystem Resilience*
- *Policy EnW3: Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species*
- *Policy EnW4: Environmental Protection*

The following supplementary planning guidance is applicable:-

- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 1: Affordable Housing (March 2012)*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 2: Planning Obligations (March 2012)*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 4: Sustainable Design (July 2013)*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 5: Nature and Development (May 2015)*

National Planning Policy

Planning Policy Wales (Edition 12, February 2024)

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

- Placemaking in Action: Good Design Making Better Places
- Strategic Placemaking: Previously Developed Land
- Active and Social Places: Living in a Place
- Recognising the Special Characteristics of Places: The Historic Environment

- Recognising the Environmental Qualities of Places

Future Wales: The National Plan 2040 (February 2021)

Future Wales provides guidance on matters relevant to this application, including, but not limited to:

- Policy 1: Where Wales will grow
- Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
- Policy 7: Delivering Affordable Homes
- Policy 33 – National Growth Area – Cardiff, Newport and the Valleys

3. Policy Considerations

The site of the proposal is located within the Primary Growth Area (Policies SW1 and SW3), as defined by the LDP, where development will be allowed subject to the proposals compatibility with other plan policies and material considerations (Policy SW4).

Policy SW1 states that 2250 additional homes are required to sustainably grow our population. The proposal would represent a contribution to the overall housing provision required during the plan period. Furthermore, Policy SW3 states that new homes will be concentrated within the main settlement of Merthyr Tydfil.

Policy SW9 relates to planning obligations. Given the nature of the proposal, on-site provision of affordable housing or open space, or a financial contribution towards affordable housing, would not be sought. However, Community Infrastructure Levy (CIL) is chargeable in this part of the County Borough (at £25 per m², index-linked).

Policy SW11 requires new development to, among other things:

- be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density;
- integrate effectively with adjacent spaces, the public realm and historic environment to enhance the general street scene and create good quality townscape;
- not result in an unacceptable impact on local amenity, loss of light or privacy, or visual impact, and incorporate a good standard of landscape design;
- allow access for the widest range of people possible, and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards.
- provide adequate facilities and space for waste collections and recycling.
- promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour.

Considering the location of the application site, in close proximity to existing dwellings, careful consideration should be given to these issues. The first, third, fourth and fifth criterion are particularly relevant.

The surrounding area is characterized by a dense form of development, with the majority of buildings, being older terraced properties. The proposal would introduce an even denser form of development, with a situation similar to the introduction of four small residential units within a single property. This could be inappropriate to the local context in terms of mix and density (first criterion).

The potential intensification of the use could also bring a subsequent and significant increase in the amount of family, friends and other visitors to the lone property (the nature of this would be different from that of a single residential/family unit occupying the property). i.e. multiple occupation of a house can involve an intensification of its residential use. For example, the new use of a three-bedroom house formerly occupied by a family of four as an HMO with four bedsitting rooms, occupied by couples, could increase both the number of people in the house and the proportion of adults. This intensification of occupation could result in increased levels of activity in and around the house (for example increased visitors and vehicles), which can have negative impacts on occupants, their neighbours and the local community. Given this intensification of use, the proposal could result in an unacceptable impact on the amenity and privacy of the surrounding dwellings.

Furthermore, the submitted plans do not indicate that the development would benefit from off-street parking. As mentioned above, the proposal would result a situation similar to the introduction of three new residential units, which could result in significantly increased traffic movements, with a negative impact on local amenity and highway safety (fourth criterion above). The proposed parking provision should therefore be checked against the Council's current parking standards, and the views of the Engineering and Traffic Group Leader should be sought in this respect.

Finally, and relating to the points already made above, given the nature, density and potential occupation of the HMO, the proposal could result in an unacceptable level of anti-social behavior (fifth criterion).

In addition to the impacts of the individual proposal, the potential cumulative impacts of HMOS (and similar types of use) in the area should be considered. Listed below are properties within 600m of the application site, which have been converted to, or have received permission to be converted to, HMOS, small flats, B&Bs and Air BnBs (this list may not be exhaustive):

1. 1st Floor, Community Centre, Greenwood Close, Twynnyrodyn,
2. 36a, Plymouth Street

It is normally difficult to demonstrate the degree of impact that an individual HMO (or similar property) would have on the character and amenity of its surroundings. However, areas where many properties are HMO can have a distinct character based on their cumulative impact.

There are recognized demographic impacts as the concentration of HMOs increases, with less families occupying the area. Additionally, other impacts can take place from the displacement of owner-occupied houses by rented houses and the displacement of the settled population by short-term residents. Impacts can include the increased appearance of estate agents advertising boards, deterioration in the general standard of property maintenance and inadequate handling of refuse. The displacement can also result in reduced use of facilities

that serve the settled population, such as schools and local shops, which can lead to their closure.

Evidence from other local authorities that have a higher number of HMOs indicates that a concentration of HMOs can lead to negative consequences in respect of crime and anti-social behaviour. Whilst these are issues that are controlled and dealt with by mechanisms outside of the planning process, if relevant evidence was to be put forward, then consideration could be given against Policy SW11 in regards to the proposals changing the character of the area.

Considering the above points, the proposal may not comply with Policy SW11. Given the increasing amount of planning applications of a similar nature being submitted in the County Borough, the cumulative impact of such developments, in terms of Policy SW11 (and other relevant LDP polices) will need to be reviewed and considered, as a matter of importance.

Policy SW12 supports development that encourages a modal shift towards sustainable transport, including the enhancement of pedestrian, cycle, rail and bus facilities, in addition to any necessary road improvements. Development proposals will be expected to demonstrate how they reduce the need to travel and encourage the use of sustainable transport. The accessibility of the application site, along with its proximity to services and amenities, and the availability of public transport should be carefully considered. As such, the views of the Engineering and Traffic Group Leader should be sought in this respect.

Policy CW1 advises that the integrity of our historic environment assets will be conserved and enhanced. Development proposals will only be permitted where it can be demonstrated they would preserve or enhance the architectural quality, character or the historic or cultural importance of our designated historic environment assets. And that, development affecting undesignated historic environment assets including, Locally Listed Buildings or structures, Landscapes of Outstanding Historic Interest in Wales, Urban Character Areas (UCA) and Archaeologically Sensitive Areas should have regard to their special character and archaeological importance.

The site is located within UCA 4 (South of the Town Centre: Plymouth Street Area), and within a Landscape of Outstanding Historic Interest. The impact of the proposal on the character of these, and any other relevant Heritage asset, should be particularly considered and, as such, the views of the relevant Officer or external heritage body should be sought, as appropriate.

Policy EnW4 advises that development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:

- Pollution of land, surface water, ground water and the air;
- Land contamination;
- Hazardous substances;
- Land stability;
- Noise, vibration, dust, odour nuisance and light pollution; or
- Any other identified risk to public health and safety.

Where impacts are identified the Council will require applicants to demonstrate that appropriate measures have been incorporated to reduce, or minimise the impact identified to the lowest possible acceptable level. Planning conditions may be imposed or legal obligation entered into, to secure any necessary mitigation and monitoring processes. With regard to

flood risk, new developments will be expected to avoid unnecessary flood risk and meet the requirements of TAN 15.

Similarly to Policy SW11 above, given the density and nature of the proposed use (including the intensification of the residential use), it has the potential to result in significant increase in noise, anti-social behaviour and traffic movements. As such, the views of the Head of Engineering and Highways, and the Environmental Health department, should be sought.