



DESIGN  
COMMISSION  
FOR WALES  
COMISIWN  
DYLUNIO  
CYMRU

# Design Review Report

Rhyd y Car West, Merthyr Tydfil

**DCFW Ref: N278**

Meeting of 6<sup>th</sup> October 2022



**Review Status**

Meeting date  
Issue date  
Scheme description  
Scheme location  
Scheme reference number  
Planning status

**Public**

6<sup>th</sup> October 2022  
19<sup>th</sup> October 2022  
Leisure & Tourism/Mixed Use  
Merthyr Tydfil  
N278  
Pre-Application

**Declarations of Interest**

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Panel members, observers and other relevant parties are required to declare ***in advance*** any interests they may have in relation to the Design Review and meeting Agenda items. Any such declarations are recorded here and in DCFW's central records.

**Consultations to Date**

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This is the second consultation with the Design Commission following project registration submitted to us in May 2022. (The Commission recommends early and sustained engagement which was previously advised for this team via correspondence of 5<sup>th</sup> May 2021). After registration in May 2022, a review meeting was convened in August 2022 at the request of the design team, where a presentation was made by them. During that review officers of the Local Planning Authority noted that they had not had sight of the materials presented nor were they yet engaged informally or formally with pre-application discussion. We understand from subsequent correspondence that officers in other departments of the Local Authority had been engaged with, but not the Planning Authority and not on the specific nature of these proposals. Given this information the Design Commission considered that continuing the review would not be helpful to any party and recommended that the August review meeting close, and that the team engage with officers of the Local Planning Authority and agree a point at which to return to the Commission for further dialogue. The meeting of 6<sup>th</sup> October 2022 was therefore held following pre-application engagement with the Local Planning Authority relating to preparation for the submission of an outline planning application. Marketing and consultation materials are available in the public domain, in the media, online, and some public consultation has taken place. Accordingly, therefore, this report also has public status.

These proposals include a mixed-use sport, leisure and tourism facility at land west of the A470 at Rhyd y Car, Merthyr Tydfil. The proposal includes an indoor snow centre (up to 39,200m<sup>2</sup>), waterpark (up to 7,500m<sup>2</sup>), indoor activity centre (up to 9,000m<sup>2</sup>), external activity areas, hotel accommodation (approx. 418 beds), forest lodge accommodation (30 units), car parking (up to 830 spaces) along with associated earthworks, access, drainage, servicing and utilities connections and infrastructure works. The registration document notes a project vision for the *'design and delivery of an exemplary, internationally recognised, sports, leisure and tourism destination...including an International Ski Federation standard indoor snow centre; indoor adventure activities; space for outdoor adventure activities; a variety of resort accommodation, including up to 420 hotel/hostel keys and 30 forest lodges; retail outlets; food beverage offers and conference facilities...new public spaces, external landscape areas, associated energy centre, travel infrastructure'*.

### Main Points

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The Design Commission welcomed the further opportunity to be consulted by the client and design team, with officers of the Local Planning Authority present. In preparation for this meeting an agenda was established to allow exploration and dialogue on the most important considerations. The main points from the discussion are set out here broadly reflecting that structure.

We note that whilst this review session was aided by the presence of the physical model and by a more exploratory discussion, the Design Commission remains unable to support the proposals in their current form and location. Our concerns stem from the fundamental concerns of sustainability, high quality design, placemaking and impacts on location, and as highlighted in the pre-application letter by the LPA, the proposals do not comply with planning policies in Future Wales and the Local Development Plan

The location for these proposals includes a site comprising significant historic landscape value and the presence of scheduled ancient monuments, along with some 6 hectares of land designated as a SSSI (Site of Special Scientific Interest). A further significant area of some 30.4 ha, we understand, is designated as a SINC (Site of Importance for Nature Conservation). There is no evidence available to us which demonstrates the testing of alternative locations and sites or compelling reasons for the selection of this one. If this testing has been carried out it should be evidenced. This also applies to options for this site should it indeed be the optimum choice. The Commission would be keen to see how

different parameters have been taken into account including orientation, changes to the landform required/cut and fill, impact on views, possible linkages etc, that have informed and led to the current proposals.

The site is separated from the town of Merthyr Tydfil by the A470 dual carriageway and is some distance from the town centre and current public transport nodes, suggesting access and journeys to and from the facility are likely to be by private vehicle. Details of shuttle-bus provision or other forms of more sustainable access and travel, while mentioned in documentation and discussion are not evident in the proposals and will require detailed planning, meaningful partnerships with operators as well as significant investment.

Given the nature of the facilities, walking and cycling to the site is not practical. The core leisure facilities, as shown in the current design proposals, are located in proximity to large areas set aside for parking which appear to serve the plaza area.

The Design Commission has no details of the business planning except that it is premised on private investment with a suggested target of 700,000 visits per annum in a year-round 365-day operation. This would mean a considerable number of daily vehicle movements, the majority by private vehicle, in addition to access to the proposed accommodation, and to visit the town and other tourist attractions such as Bike Park Wales.

The proposal is described by the design team as one of UK and international significance and as an exemplary development. The Design Commission therefore wished to understand how this vision in terms of exemplary and exceptional design solutions, energy performance and decarbonisation would be achieved. Currently the design materials available lack sufficient commitments to, or targets for, energy and carbon performance, embodied and operational, as well as key strategic considerations for example it has not been proven yet that the heat recovered from the snow centre will be sufficient to heat the pool.

Whilst the Commission accepts there are several ways to design for exemplary performance in buildings and energy systems, without clear targets and commitments, exemplary performance will not be protected in the design development, construction stages or operational cost and business planning. The proposed facilities for indoor and outdoor, year-round leisure, and elite snow and water sports, are by their nature energy and water-hungry in operation.

Given the stated aim for an exemplar project, the Design Commission considers that the performance targets and sustainability strategy should be ambitious and informed by the

latest low-energy precedents in leisure and hotel buildings worldwide. The strategy should also be tuned to take full advantage of opportunities offered by the specific uses proposed, and that any off-setting be avoided.

The current sustainability strategy indicates that private vehicle journeys make up the majority of the operational carbon footprint of the proposals, which is a function of the countryside location of the site and evidenced by the quantum of parking proposed. The documents suggest that a shuttle bus link to Merthyr Tydfil Station has already been considered but significantly more work would be required on alternative transport solutions to reduce the impact of private vehicles and overcome the suggestion that the site is inherently unsustainable.

The selection of this site for these specific proposals requires significant engineering, changes to the landform, and mitigation to accommodate the proposed mix and distribution of uses. The architectural approach is as yet only very broadly scoped and performance ambition is set out only as an aspiration to exceed Part L of Building Regulations.

Given the context of national planning policy, the Welsh Government's declaration of both Climate and Nature emergencies, and the timescale for this development, even for an outline planning application such a minimal approach is some distance from exemplary.

We understand that the design team are keen to address the scale of the task in terms of design quality and performance. However, at present there is no evidence in the design approach as to how they will do so.

### Placemaking and connections

The proposals are for a self-contained facility that is remote from the town centre. The scheme has not attempted to spread its potentially positive influence over a wider area, such as locating some hotel accommodation in the town itself, resulting in an insular design. Placemaking opportunities on the site itself are compromised by a heavily engineered approach to the existing landform (we understand there are challenging technical issues at play here), but a more sympathetic landscape design will be vital. For example, the large formally planned car park is a dominant feature that appears to be placed on the site on an unnecessary plateau rather than emerging from it and taking the context into account. The public space at the heart of the scheme is a core concept, but its focus on arrivals by car again highlights the vehicle-dominated nature of the scheme. The project would need to be required to step outside its boundary.

The Design Commission understands that public engagement has been carried out over an extended period and during the pre-application stages. We note too though that the samples returned are small in the context of the population of Merthyr Tydfil and that very few if any young people have engaged. Specifically, the data shows no one under the age of 31 has engaged with the proposals. For development proposals to make a meaningful contribution to placemaking and social value, understanding the needs of all people in the locale and taking action to address them in the proposals is vital.

We strongly recommend the appointment of a specialist public engagement team who can take an inclusive approach and engage with a wider range of Merthyr Tydfil's population and stakeholders, including its multi-cultural and Welsh speaking communities as well as Welsh medium education and community representatives.

### Contributions to cultural richness and distinctiveness

The proposals need to acknowledge and celebrates the place in which it is located – including the working class, and linguistic history – which stretches to far more than providing bi-lingual signage.

Merthyr Tydfil's history is rooted in the medium of the Welsh language and its current context is within that of a bi-lingual nation. In 1891, 68.4% of the population of Merthyr spoke Welsh. The scheme should aim to acknowledge this history, and to treat the Welsh language with equal status to the English language when approaching scheme names, as well as historic interpretation. Merthyr Tydfil also has a rich history of Welsh, and Welsh-language culture, including hosting the National Eisteddfod in 1901, and according to National Identity by area statistics, 84.3% of the people of Merthyr Tydfil consider themselves Welsh. In the context of Merthyr's international reach and influence over more than a century, this distinctive sense of identity remains resilient. As part of the public engagement thorough research is essential alongside the need to convey important stories, and develop a strong means of interpretation.

### **Summary**

The Design Commission appreciates the client and design team consulting with us further with the aim of garnering our support for these proposals. We appreciate, too, that the client's vision is one of genuine ambition. As stated in the meeting we are, however, still significantly concerned about these proposals and their impacts, and cannot support the current proposals.

The Local Planning Authority's verbal comments and their written pre-application correspondence, made available to everyone present at this meeting, also indicates a significant weakness in the acceptability of these proposals to the Authority and in the context of national and local planning policy.

The Design Commission has significant concerns on grounds of site location, sustainable development, energy and decarbonisation along with access implications and impacts on historic landscape setting. That this proposal is the right development in the right place and that it responds to the local and national planning policy context is not demonstrated – even to the extent needed for outline planning consent. The scale of the changes to the landform and the historic landscape needed to accommodate the proposal as highlighted above suggests that this is not an optimum location or design solution.

The project team has stated that the project needs to be and shall be exemplary – now this needs to be followed through, starting with sustainability targets leading to a net zero carbon scheme (embodied and operational) which will need to be tested on the project to ensure they can be delivered.

This also applies to travel and transport where parameters need to be set and travel options for arrival and dispersal need to be explored whilst avoiding offsetting. This will be one of the key considerations in the carbon calculations.

Relevant uses and connections need to be explored further, some of which might be evolving through public consultation. It needs to be demonstrated how links and connections can be made.

The project team needs to ensure that a consultation strategy is in place that is complete and inclusive and considers hard to reach groups and all age-groups. Specialist consultants could assist the client to fully understand social and cultural value that reaches beyond employment figures.

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**interest for the consideration of local planning authorities as a material consideration, and other users of the Design Review Service. It is not and should not be considered 'advice' and no third party is bound or required to act upon it. The Design Review Service is delivered in line with DCFW's published protocols, code of conduct and complaints procedure, which should be read and considered by users of the service.**

***A Welsh language copy of this report is available upon request.***

#### Attendees

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Agent/Client/Developer: Ali Tyebkhan (CEO), Rhydycar West  
Richard Arnold (COO), Rhydycar West  
(both joining online via TEAMS)

Architect/Design Team: Steven Hill, HMA  
Wilko Stekkinger, HMA

Landscape Architect: None present

Other Consultants: Sam Shooter, Hoare Lea and Partners (until 3pm)

Planning Consultant: Peter Waldren, Carney Sweeney Planning

Local Authority: Judith Jones, Merthyr Tydfil County Borough Council  
Huw Roberts, Merthyr Tydfil County Borough Council

#### **DCFW Design Review Panel**

Chair: Cora Kwiatkowski

Panel: Chris Jefford, Lead Panellist  
Toby Adam  
Mike Gwyther Jones  
Efa Lois, DCFW, Place Advisor

Observer/s: Carole-Anne Davies, DCFW, Chief Executive