
PLANNING STATEMENT

Land at Elm Tree Grove, Twynrobyn,
Merthyr Tydfil

March, 2021



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1.0 INTRODUCTION

- 1.1 This planning statement accompanies a full planning application submitted for residential development and associated works at Land off Oak Tree Rise, Twynroddyn, Merthyr Tydfil.
- 1.2 The statement comprises of the following components:
- 📖 *Section 2 – Overview of the site and its surroundings;*
 - 📖 *Section 3 – Summary of the proposal;*
 - 📖 *Section 4 – Summary of the supporting documentation;*
 - 📖 *Section 5 – Planning Policy Review; and,*
 - 📖 *Section 6– Appraisal of the principle of development and other material considerations.*
- 1.3 The purpose of this document is summarise and provide commentary around the merits of the proposal against the background information submitted as part the application. In addition it provides a contextualised application of relevant national and local planning policy having regard to the proposal.

2.0 SITE DESCRIPTION AND CONTEXT

GENERAL LOCATION

- 2.1 The site is located in the Twynroddyn area of Merthyr Tydfil. The site lies to the southeast of Merthyr Tydfil town centre, which has a range of local amenities and services. The town is situated on the A465 known as the heads of the valley road, connecting Merthyr to the west through to Neath and east towards Abergavenny and Hereford.
- 2.2 The site is bound by Elm Tree Grove and Oak Tree Rise to the east, existing residential development at Wallhead road to the west, existing residential development at Penheolferthyr to the north and existing greenfield land to the south.
- 2.3 The A4060 which is located to the east of the site connects to the A470 to the south and the heads of the valley road (A465) to the north. The A470 trunk road provides access to the north of Merthyr towards Brecon and to Cardiff in the south. The A470 provides access to the M4 via junction 32, which is 18 miles south of the application site. The M4 is the major road network connecting south east Wales and beyond.
- 2.4 Merthyr Tydfil Railway Station is located less than one mile away from the application site, providing a half-hourly service to and from Cardiff central.

SITE DESCRIPTION

- 2.5 The site is accessed off Elm Tree Grove which currently serves the existing development on Oak Tree Rise. Elm Tree Grove is accessed via the roundabout on Penheolferthyr, which lies to the north of the site and connects the site to the A460 and A470.
- 2.6 There is an existing bridleway and public right of way running through the centre of the site, this has been retained as part of the layout.
- 2.7 The site is situated to the south east of Merthyr Tydfil town centre which has a range of local facilities including Post Office, Doctor Surgery, Public House, Take Away Restaurant, Shops and Convenience Stores. The local primary and infant's schools are within 225 metres of the site. Cyfarthfa High School is 1.20km away from the site.

- 2.8 The site is located 200 metres from a bus stop on Wallhead Rd. With an additional stop located on Penheolferthyr Road. These stops provide convenient access to Merthyr Tydfil town centre.
- 2.9 Merthyr Tydfil Railway Station is located approximately 0.7 miles by foot to the west of the site. Merthyr Tydfil Railway is part of a valley line and operates a 30 minute service Monday to Sunday.

PLANNING HISTORY

- 2.10 There is no relevant planning history relating to the site.

3.0 PROPOSALS

- 3.1 The application seeks consent for a residential development consisting of 131 dwellings and associated works and operations. The planning layout illustrates the detail of the proposal.
- 3.2 The site is currently accessed via Elm Tree Rise which is proposed to be relocated to the North of the site, with the entrance coming off Elm Tree Grove. The entrance road is shared with the exiting neighbouring residential development.
- 3.3 One of the key principles of the layouts design is the retention of existing ecological features. Trees, hedgerows and water bodies will be retained and enhanced where possible. The retained features will also be complemented by additional new natural features. The site in its entirety will be enclosed by vegetation, so as to maintain the existing natural features and provide effective screening.
- 3.4 Pedestrian connectivity will be provided through the incorporation of foot, cycle and bridle ways. These measures will ensure that the proposal is integrated into the fabric of the built form, whilst also encouraging pedestrian movement to and from the proposal.
- 3.5 Persimmon Homes has experience of delivering housing developments nationally. This experience, together with the agreement that exists between Persimmon Homes and the landowner will ensure that the proposals subject to the grant of planning permission – is delivered at the earliest opportunity.

4.0 SUPPORTING INFORMATION

- 4.1 The following section provides a brief overview of the findings of the assessments, surveys, and reports prepared in support of the application.

TRANSPORT ASSESSMENT

- 4.2 The application is supported by a Transport Assessment prepared by Lime Transport. The scope of the Transport Assessment is based on the Department for Transport's 'Transport Evidence Bases in Plan Making and Decision Taking' (2015). The remit of the Transport Assessment has been agreed in consultation with the Local Planning Authority and following comments received from RedStart.
- 4.3 The site is considered to be within easy walking and cycling distance of Merthyr Tydfil and the majority of local facilities and amenities, as well as employment. The site is also within walking distance of existing bus stops along Penheolfethyr, Glasier Road and Aneurin Crescent. The rail station in Merthyr Tydfil is within 0.7 miles of the site. There is a network of a public rights of way that run through the site, connecting to Penheolfethyr (at the north east corner) with Aneurin Crescent (at the south-west corner). These route have been incorporated within the scheme, providing permeable development. In addition a number of pedestrian footpaths throughout the site which will connect the edge of the site boundary, providing pedestrian and cycle links through the site between Elm Tree Grove, Wallhead Road and Aneurin Crescent.
- 4.4 The Transport Assessment thereafter considers the parking provision and travel characteristics likely to be associated with the development. The provision of parking is below the maximum requirement as prescribed from a policy perspective and considering car ownership census data the provision is ample to accommodate the likely demand. It is anticipated that the development would generate 78 vehicle movement (two-way) in the AM peak and up to 94 vehicle movements (two-way) in the PM peak. Modal choice is anticipated to be 63 percent in favour of driving, with walking representing 27 percent.
- 4.5 Likely impacts of vehicle usage on the existing network is considered and assessed as part of the Transport Assessment. Of the seven junctions identified two exceed the five percent threshold outline in TAN18 as being a material

increase. Additional analysis indicates that both junctions have sufficient capacity to accommodate the likely increase in traffic flows as a result of both background growth (to 2032) and the proposed development. That being the case, the Transport Assessment confirms that the proposal is acceptable from a transport perspective.

ECOLOGY

- 4.6 An Extended Phase I Habitat Survey Report, Bat Tree Assessment, Reptile Survey, Reptile Strategy, Construction Environmental Management Plan and Biodiversity enhancement and management plan has been prepared by TerrAqua Ecological Services. The reports demonstrate that no part of the site is covered by any National
- 4.7 The site lies within 2km of eight (8) locally designated sites of interest to nature conservation. None of these sites lie immediately adjacent to the proposed development site.
- 4.8 The grassland areas within the application site have been assessed as being of moderate ecological value and while variable in species composition do not represent swards of high floristic diversity. These grasslands are likely to support common invertebrate species but it is unlikely that rare or significant populations of uncommon species are present. An invertebrate survey indicates that there species recorded can be considered relatively common and occur in a wide range of habitats. None of the species recorded are currently afforded full protection under the Wildlife and Countryside Act 1981. No species recorded on the site has a current Merthyr Local Biodiversity Action Plan Species Action Plan in place. There were two species (*Tyria jacobaeae* and *Coenonympha pamphilus*) recorded as species of Principle Importance for maintaining and enhancing. No evidence was found that the site supports any invertebrates listed in Schedule I of the Wildlife and Countryside Act. Based on the survey results the site does not meet the current criteria for selection as a Wildlife Site (SINC) with regard to its assemblage of invertebrate species.
- 4.9 All habitats within the site have been identified as having a high potential for use by reptile species. A full survey of the site in order to ascertain the full importance of the site to reptiles has been undertaken. It concludes that reptiles were found at the site and appropriate avoidance and mitigation measures will be required in

order to ensure that no reptiles are injured or killed during the proposed works. This can be achieved through appropriate management, including vegetation manipulation, perimeter reptile exclusion fencing and translocation to a receptor site.

- 4.10 The woodland blocks have been assessed for their potential importance to bat species. No trees suitable for use by roosting bats are present within the site boundary. All trees have been assessed as category (3) trees meaning they have negligible value to bats. The site has direct links with adjacent buildings and extensive open countryside to the south all of which afford opportunities for bats. The accompanying bat activity survey indicates that there are no national, international or local designations for importance to bat species. No building on site present feature suitable for use by roosting bats. Common pipistrelle were recorded foraging and commuting along scrub and woodland edges on the periphery of the site. In addition, an individual soprano pipistrelle was recorded foraging along the southern and western boundary. Individual natterer's bats were recorded, up to three. Noctule bats were detected as passing high over the site. Peripheral landscaping and internal landscaping, as indicated in the connectivity of habitat technical note will be implemented to ensure foraging and commuting routes will be provided/protected.
- 4.11 The ditch has been identified as being of very limited potential value to common amphibians at a site level although its ephemeral nature may reduce its ecological value. No habitats suitable for use by the protected great crested newt are present within the site boundary.
- 4.12 Brown field sites are often important areas for invertebrate species and can support a wide range of common, uncommon and rare species. Further detailed survey work will be required before the full value of the site to invertebrate species can be fully ascertained.
- 4.13 The loss of trees, scrub and other habitats will lead to the loss of feeding and nesting areas for birds. Nesting birds are protected by law. Any clearance work must be undertaken outside the bird breeding season March-July inclusive or ecological advice sought and areas to be removed checked for nesting birds by an ecologist no earlier than 48 hours before removal works commence. If nesting birds are found then works must stop and no works on that area of

hedgerow/habitat can be undertaken until all chicks have fledged and the nest abandoned.

- 4.14 No evidence of badger was found within any area of the site and no records for an historic badger presence was found therefore badger are unlikely to be affected by any future development.
- 4.15 No habitats suitable for use by hazel dormouse was found within the survey boundary. The site also lacks the degree of connectivity with high quality habitats associated with use by dormouse.

TREES

- 4.16 A Tree Survey, Arboricultural Constraints Report and Tree Constraints Plan have been prepared by Steve Ambler & Sons Tree Specialists Ltd. The first document analyses the trees and hedgerows on site and categorises them in terms of their retention value. The second document outlines how the existing trees could potentially form constraints to development, whilst the third plan illustrates the root protection areas of the trees worthy of retention. The final tree protection plan will be informed by the final design solution to the attenuation structure, thereafter supported by an updated landscaping strategy.

DRAINAGE AND FLOOD RISK

- 4.17 A drainage strategy and flood risk assessment has been carried out by Phoenix Design Partnership Ltd, this report provides information on the surface & foul water drainage.
- 4.18 The surface water will drain to the existing watercourse that runs through the site.
- 4.19 Foul drainage shall discharge to the existing public system to the east of the development, initially by pumping station.
- 4.20 Climate change impact for the 100-year life of the residential development a 30% allowance for the predicted increase in rainfall intensity has been assumed for the design of the surface water drainage in accordance with Technical Advice Note (TAN 15) & SAB Legislation.
- 4.21 The Site is located within Flood Zone A and considered to be at little or no risk of fluvial or tidal/coastal flooding.

ARCHAEOLOGY

- 4.22 A cultural Heritage Desk Based Assessment has been undertaken by Red River Archaeology. This report concludes that the proposed development has a low potential to encounter buried archaeological remains apart from any which may be associated with the former extraction works or the former brickworks located at the eastern boundary of the site in the late 19th century. The extraction works are likely to have heavily disturbed any earlier archaeological remains which may have been present on site.

AIR QUALITY

- 4.23 The application is supported by an Air Quality Assessment that reviews the potential impacts of development from both a construction phase and post completion perspective. The report confirms that the air quality within Merthyr Tydfil is currently good overall, with only limited pockets of poor air quality, most notably within the Twynyrodyn AQMA to the west of the development site. In 2019, however, there were no monitored exceedances of air quality objectives for nitrogen dioxide or particulate matter.
- 4.24 The report concludes that there's a high risk of dusk impacts from the construction phase of development. This can be mitigated through construction management control to ensure that no significant effects arise from the construction of the development. This can be addressed through planning condition and appropriate construction management plan.
- 4.25 The impacts of the development post completion on air quality will arise from development-related traffic generation on local air quality. The report concludes that generally effects will be negligible, but potentially slightly adverse within the Twynyrodyn AQMA in the early years after opening. The development is built on a sustainable principle with good access by walking, cycling and public transport. Active travel will be encouraged and these measures have the potential to reduce the modelled impacts. In addition, the report does not capture the likely shift in traffic behaviour post pandemic with a significant shift to hybrid and home working patterns.
- 4.26 Overall the assessment demonstrates that air quality will not present a significant construction to the proposed development, either offsite or onsite. It will not result in a material deterioration in air quality or harm to health as a result of its

construction and occupation and is compliant with national and local planning policies and guidance.

5.0 PLANNING POLICY FRAMEWORK

CONTEXT

- 5.1 The policy framework for the determination of this application is prescribed by the adopted Local Development Plan, which should be read in conjunction with the 11th edition of Planning Policy Wales (PPW) and the National Development Framework (NDF) (Future Wales: the national plan 2040). Section 38 of the Planning and Compulsory Purchase Act 2004 requires that in determining a planning application the determination must be in accordance with the Development Plan, unless material considerations indicate otherwise.

PLANNING POLICY WALES (PPW) 11TH EDITION

- 5.2 National Planning Policy is contained within the 11th edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2021. PPW is supported by 20 topic-based Technical Advice Notes (TANs) and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.
- 5.3 PPW is the Welsh Government's principal planning policy document, with the primary objective of ensuring that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.
- 5.4 PPW and the Future Wales National Plan set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plan (LDPs). Paragraph 1.9 of PPW indicates that it should be read as a whole, as aspects of policy and their application to a particular development proposal could occur in several parts of the document. Where 'must' is used in the document it reflects a legislative requirement or indicates where action is needed now to make changes in practice over the long term to achieve strategic outcomes. Where

'should' is used it reflects Welsh Government expectations of an efficient and effective planning system.

5.5 The most relevant sections of PPW considered to be:

1. *People and Places: Achieving Well-being Through Place Making*
2. *Strategic and Spatial Choices*
3. *Active and Social Places*
4. *Distinctive and Natural Places*

PEOPLE AND PLACES

5.6 Achieving wellbeing through place making. There are 5 key planning principles highlighted, under the general heading of *Achieving the Right Development in the Right Places* which are:

1. *Growing our economy in a sustainable manner*
2. *Making best use of resources*
3. *Facilitating accessible and healthy environments*
4. *Creating and sustaining communities*
5. *Maximising environmental protection and limiting environmental impact.*

5.7 With respect to using PPW, paragraph 2.26 emphasises that development plans and proposals should be prepared within the context of the above key planning principles:

1. *The 1st stage is to assess plans or proposals against the Strategic and Spatial Choices issues and the National Sustainable Placemaking Outcomes;*
2. *The 2nd Stage assesses the detailed impact and contribution to Active and Spatial Choices, Productive and Enterprising Places and Distinctive and Natural Places (it is acknowledged that these will vary on a case by case basis);*
3. *This process will result in a strategy or proposal, which contributes, to the sustaining or creation of sustainable places.*

5.8 Paragraph 2.27 states that;

Planning authorities should ensure that economic, social, cultural and environmental benefits are given equal consideration in the decision making process, by following the 5 ways of working, to ensure that a balanced assessment is carried out and to implement the Well Being of Future Generations Act and the Sustainable Development Principle. There may be occasions where one type of benefit outweighs others, and in such cases, robust evidence should be presented to support these decisions.

STRATEGIC AND SPATIAL CHOICES

5.9 The document states that effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. The policy issues should not be considered in isolation from one another. This includes considering the design of a development and its impacts upon everyday lives as well as thinking holistically about where people may live and work and which areas should be protected.

5.10 Paragraph 3.3 emphasises that:

Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.

5.11 Paragraph 3.16 it is stated that:

Planning authorities should 'through a process of negotiation seek to improve poor or average developments which are not well designed, do not take account of their context and consider their place, or do not meet the objectives of good design. Where this cannot be achieved proposals should be rejected. However, they should not attempt to impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions. If a decision maker considers that a planning application should not be approved because of design concerns they should ensure that these reasons are clearly articulated in their decision and justified with sufficient evidence. In the event of an appeal, in these circumstances, the Planning Inspectorate will need to examine the issues in detail and consider if the proposal meets the objectives of good design including the relationship between the site and its surroundings.'

5.12 Paragraph 3.61 states that:

Adequate and efficient infrastructure, including services such as education and health facilities along with transport, water supply, sewers, sustainable waste management, electricity and gas (the utilities) and telecommunications, is crucial for economic, social and environmental sustainability. It underpins economic competitiveness and opportunities for households and businesses to achieve socially and environmentally desirable ways of living and working. Infrastructure which is poorly designed or badly located can exacerbate problems rather than solving them.

ACTIVE AND SOCIAL PLACES

5.13 This section defines those places which promote social, economic, environmental and cultural well-being by providing well-connected cohesive communities. Places which are active and social contribute to the seven goals of the Well-being of Future Generations Act.

5.14 The key issues in this theme include:

- ✎ *ensuring there is sufficient housing land available for both private and affordable;*
- ✎ *facilitating a range and choice of housing to respond to the change in household need;*
- ✎ *assisting in the delivery of cohesive communities which will meet the needs and are accessible to all members of society, including older people;*
- ✎ *improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles which will assist in improving health and wellbeing;*
- ✎ *reducing reliance on travel by private car, and the adverse impacts of motorised transport on the environment and people's health, by prioritising and increasing active travel and public transport; and,*
- ✎ *ensure our transportation infrastructure is adaptable to future advances in innovation such as the mainstreaming of electric vehicles or possible advent of autonomous or driverless vehicles in the next ten to 15 years.*

5.15 This theme supports and enables the provision of a range of well-designed and located homes which are well connected to existing retail and commercial centres situated at the heart of our communities and job opportunities. It emphasises that when planning and managing future development planning authorities need to ensure that residents of existing and new communities have access to jobs and an appropriate range of community facilities.

5.16 Paragraph 4.1.12:

Confirms that it is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. The transport hierarchy recognises that Ultra Low Emission Vehicles also have an important role to play in the decarbonisation of transport.

5.17 Paragraph 4.1.20 emphasises that:

The design and layout of streets must give a high priority to their role as public spaces and meeting the needs of pedestrians, cyclists and public transport users, reflecting the principles of the sustainable transport hierarchy. To create streets that are social places, the public realm needs to be safe and attractive and the street designed for low speeds.

5.18 Paragraph 4.2.22 states that:

Planning authorities will need to ensure that in development plans and through the development management process they make the most efficient use of land

and buildings in their areas. Higher densities must be encouraged on sites in town centres and other sites which have good walking, cycling and public transport links.

DISTINCTIVE AND NATURAL PLACES

5.19 This section requires that development plan strategies, policies and development proposals should be formulated to look to the long-term protection and enhancement of the special characteristics and intrinsic qualities of places, be these of natural, historic or built environments, ensuring their longevity in the face of change. This means both protecting and enhancing landscapes, habitats, biodiversity, geodiversity and the historic environment in their own right as well as other components of the natural world, such as water resources or air quality.

5.20 The key issues in this theme include:

- 📖 Long term and chronic decline of biodiversity and habitat loss;
- 📖 Adaptation to the effects of climate change;
- 📖 Recognising and addressing the factors influencing landscape change; and,
- 📖 Loss of venues for cultural activities or historic assets.

5.21 Paragraph 6.15 states that:

The planning system must consider the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations.

5.22 Paragraph 6.2.4:

'Integrating Green Infrastructure and Development' emphasises that green infrastructure plays a fundamental role in shaping places and our sense of well-being, and are intrinsic to the quality of the spaces we live, work and play in. The planning system should protect and enhance green infrastructure assets and networks because of these multifunctional roles. The protection and enhancement of biodiversity must be carefully considered as part of green infrastructure provision alongside the need to meet society's wider social and economic objectives and the needs of local communities.

5.23 Paragraph 6.4.2 refers to The Environment (Wales) Act 2016 which introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals. The Nature Recovery Action Plan supports this legislative requirement to reverse the decline in biodiversity, address the underlying causes of biodiversity loss by putting nature at the heart of decision-making and increasing the resilience of

ecosystems by taking specific action focused around the 6 objectives for habitats and species.

5.24 Paragraph 6.4.5 states that:

Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity. In doing so planning authorities must also take account of and promote the resilience of ecosystem, in particular the following aspects:

-  *Diversity between and within ecosystems;*
-  *The connections between and within ecosystems;*
-  *The condition of ecosystems including their structure and functioning; and,*
-  *The adaptability of ecosystems.*

5.25 To achieve paragraph 6.45, Paragraph 6.4.21 prescribes a hierarchy approach which is stated below:

Planning authorities must follow a step-wise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible.

- 1. The first priority for planning authorities is to avoid damage to biodiversity and ecosystem functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites that would result in less harm, no harm or gain have been fully considered.*
- 2. Planning authorities should ensure that features and elements of biodiversity or green infrastructure value are retained on site, and enhanced or created where ever possible, by adopting best practice site design and green infrastructure principles. The provision of up to date ecological survey information will assist in this process. Where necessary, planning authorities should seek to modify the development proposal through discussion with the applicant at the earliest possible stage. Biodiversity and green infrastructure modifications should draw on the issues and opportunities identified through the Green Infrastructure Assessment.*
- 3. In some circumstances, it will be appropriate to attach planning conditions, obligations or advisory notes to a permission, to secure biodiversity outcomes. Planning authorities should take care to ensure that any conditions necessary to implement this policy are, relevant to planning, relevant to the development to be permitted, enforceable, precise, and reasonable in all other respects.*
- 4. When all other options have been exhausted, and where modifications, alternative sites, conditions or obligations are not sufficient to secure biodiversity outcomes, offsite compensation for unavoidable damage must be sought:*
 - a. This should normally take the form of habitat creation, or the provision of long-term management arrangements to enhance*

existing habitats and deliver a net benefit for biodiversity. It should also be informed by a full ecological assessment before habitat creation or restoration starts.

- b. The Green Infrastructure Assessment should be used to identify suitable locations for securing offsite compensation. Where possible, a landscape-scale approach, focusing on promoting wider ecosystem resilience, should help guide locations for compensation. This exercise will determine whether locations for habitat compensation should be placed close to the development site, or whether new habitat or additional management located further away from the site would best support biodiversity and ecosystem resilience at a wider scale.*
- c. Where compensation for specific species is being sought, the focus should be on maintaining or enhancing the population of the species within its natural range. This approach might also identify locations for providing species-specific compensation further away from the site. Where they exist, Spatial Species Action Plans should be used to help identify suitable locations.*
- d. Any proposed compensation should take account of the Section Duty (Biodiversity and Resilience of Ecosystems Duty), and the five key ecosystem resilience attributes that it outlines. It should also be accompanied by a long term management plan of agreed and appropriate mitigation and compensation measures.*

5. Finally, where the adverse effect on the environment clearly outweighs other material considerations, the development should be refused.

5.26 Edition 11 goes on to state that Development plan strategies, policies and development proposals must consider the need to:

- ✎ support the conservation of biodiversity, in particular the conservation of wildlife and habitats;
- ✎ ensure action in Wales contributes to meeting international responsibilities and obligations for biodiversity and habitats;
- ✎ ensure statutorily and non-statutorily designated sites are properly protected and managed;
- ✎ safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them, such as water and soil, including peat; and,
- ✎ secure enhancement of and improvements to ecosystem resilience by improving diversity, condition, extent and connectivity of ecological networks.

5.27 In the above context Biodiversity and Resilience of Ecosystems Duty (Section 6 Duty) is referred to where local planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity.

5.28 Paragraph 6.6.7 emphasises that:

Water resources and quality must be taken into account from an early stage in the process of identifying land for development and redevelopment. The protection of water resources should be based on ensuring sustainable use in the future. Meeting short term needs should be balanced against ability to protect water resources over the long term. This may mean that the location of new development, and its type, requires careful consideration.

5.29 Paragraph 6.6.10 refers to

The need to balance the growing demand for water services with the needs of the environment. Even where there is theoretical capacity, timely investment in infrastructure is required to ensure that new development does not adversely affect water supplies or sewerage drainage systems and have consequential impacts on water quality and surface water flooding.

5.30 Paragraph 6.6.17 'Sustainable Drainage Systems (SuDS) and Development', states that:

New developments of more than one dwelling or where the area covered by construction work equals or exceeds 100 square metres also require approval from the SuDS Approval Body (SAB) before construction can commence. Adoption and management arrangements, including a funding mechanism for maintenance of SuDS infrastructure and all drainage elements are to be agreed by the SAB as part of this approval. This will ensure that SuDS infrastructure is properly maintained and functions effectively for its design life.

FUTURE WALES: THE NATIONAL PLAN 2040

5.31 The NFD, titled Future Wales: the national plan 2040 (FW) is a Development Plan which sets the direction for development in Wales from 2020-2040. It sets a strategy for addressing key national priorities through the planning system, including sustaining and development a vibrant economy, decarbonisation, developing resilient ecosystems and improving the health and well-being of our communities.

5.32 The FW is the highest tier of Development Plan and is focused on issues and challenges at a national scale. Its strategic nature means it does not allocate development to all part of Wales, nor does it include policies on land use. It is a framework which will be built on by Strategic Development Plan at a regional level and Local development Plans at local authority level. It is clear in indicating that our planning system is development plan led. FW identifies and connects key national and regional centres, provides a basis for long term infrastructure investment, priorities for the planning system and a framework for the management of natural resources.

- 5.33 The FW vision for Wales is broken down into 11 key outcomes. It calls for a Wales where people live; (1) and work in connected, inclusive and healthy places; (3) in distinctive regions that tackle health and socio-economic inequality through sustainable growth; (5) and work in towns and cities; (7) in places where travel is sustainable; (8) in places with world class digital infrastructure; (10) in places with biodiverse resilient and connected ecosystems; and, (11) in places which are decarbonised and climate-resilient.
- 5.34 In terms translating that vision into a spatial strategy, FW indicates that national grow areas include Cardiff, Newport and the Valleys, Policy 1, where Welsh Government supports sustainable growth in housing opportunity. The Heads of the Valley's road is noted as a strategic National Connectivity corridor. Policy 2 focuses on strategic placemaking and indicates development should deliver a variety of housing to ensure places are socially mixed, walkable scales, minimum densities in urban areas and green infrastructure. Policy 7 seeks to increase the delivery of affordable homes and acknowledges that market housing plays a vital and important role in responding to housing need. Green infrastructure and ecological networks are addressed in Policy 9 which seeks to ensure the enhancement of biodiversity and resilience of ecosystems whilst providing green infrastructure. The importance of digital communication is addressed in Policy 13 which indicates new development should include the provision of cable broadband from the outset.
- 5.35 The site is located in a national grow area where sustainable growth is to be supported. The proposal includes a range of properties that ensure a social mix, including the provision of affordable housing. Green infrastructure is provided as part of the development, together with areas of public open space for recreation. The site will be served by FibreNest infrastructure, delivering cable broadband direct to the home.

PLACEMAKING CHARTER

- 5.36 PPW emphasises the importance of placemaking and the concept of holistic approach to the planning and design of development and spaces, focused on positive outcomes. Placemaking considers the context, function and relationships between development and its wider surroundings. The Placemaking Charter has been developed to reflect the commitment to support the development of high

quality places. It includes six placemaking principles that are to be promoted as part of their support for placemaking.

- ✎ **People and community** – involvement of the local community in the proposal and the needs, aspirations and well-being of all people are considered at the outset. The site's very recent allocation within the LDP was subject to extensive public consultation and engagement. Persimmon Homes have carried out an enhanced pre-application consultation processes in advance of this submission, the details of which can be found in the accompanying PAC Report submitted as part of the application.
- ✎ **Location** – places grow and develop in a way that uses land efficiently, supports and enhances existing places and well connected. The proposal responds to the LDP as a planned location for housing owing to its sustainable location in proximity to key services and infrastructure.
- ✎ **Movement** – walking, cycling and public transport are prioritised to provide choice of transport and avoid dependence on private vehicles. The proposal retains the public right of way and bridleway that bisects the site and seeks to provide positive integration with neighbouring areas to promote active and sustainable modes of travel.
- ✎ **Mix of uses** – places have a range of purposes which provide opportunities for community development, local business growth and access job, services and facilities via walking, cycling and public transport. The site's proximity to the town centre is such that the development provides a range of services, job opportunities, services and community facilities within walking and cycling distance of the development.
- ✎ **Public realm** - streets and public spaces are defined, welcoming, safe and inclusive with a distinct identity. The proposal responds to existing development and the site's characteristics to provide well considered and defined spaces and street at various hierarchical levels, as set out in the Design and Access Statement that accompanies the submission.
- ✎ **Identity** – positive, distinctive qualities of existing places are valued and respected. The development utilises a range of house types and material finishes that seek to promote a sense of place within the development, whilst responding the character and appearance of existing neighbouring development.

5.37 Persimmon Homes (East Wales) is a Charter Signatory and has considered these placemaking principles in the development of this proposal.

WELL BEING OF FUTURE GENERATIONS (WALES) ACT 2015

5.38 The Well-Being and Future Generations (Wales) Act (WBFG) 2015 requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.

5.39 To ensure we all work towards the same purpose, the Act puts in place seven well-being goals which public bodies are required to work towards achieving. The Act is a material consideration in planning terms and therefore its goals are considered relevant to this proposal. These are as follows:

- 🏡 A prosperous Wales;
- 🏡 A resilient Wales;
- 🏡 A healthier Wales;
- 🏡 A more equal Wales;
- 🏡 A Wales of cohesive communities;
- 🏡 A Wales of vibrant culture and Welsh Language; and,
- 🏡 A globally responsible Wales.

TECHNICAL ADVICE NOTES (TAN)

5.40 Planning Policy Wales is supplemented by a series of 20 topic based Technical Advice Notes (TANs) which provide practical guidance relating to various forms of development and the role of the planning system in dealing with the determination of planning applications. The following TANs are considered relevant to this application:

TECHNICAL ADVICE NOTE 2: PLANNING AND AFFORDABLE HOUSING (2006)

5.41 TAN 2 (June 2006) advises on the mechanisms of the land use planning system that can be used to provide affordable housing and therefore ensures development of sustainable communities. The TAN facilitates delivery of policy objectives set out in PPW by assessing local housing markets and setting affordable housing targets based on this.

TECHNICAL ADVICE NOTE 5: NATURE CONSERVATION AND PLANNING (2009)

5.42 TAN 5 (September 2009) provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it,

TECHNICAL ADVICE NOTE 11: NOISE (1997)

5.43 TAN 11 (October 1997) provides advice on how the planning system can be used to minimise impact of noise without placing unreasonable restrictions on

development. It outlines some of the main considerations which local planning authorities should take into account in drawing up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.

TECHNICAL ADVICE NOTE 12: DESIGN

5.44 This Technical Advice Note was revised in March 2016 in order to reflect new requirements, including those for design and access statements. The TAN provides advice on design considerations and states that local planning policies and guidance should aim to:-

- ✦ Create places with the needs of people in mind, which are distinctive and respect local character;
- ✦ Promote layouts and design features which encourage community safety and accessibility;
- ✦ Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles;
- ✦ Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building;
- ✦ Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards;
- ✦ Secures the most efficient use of land including appropriate densities; and,
- ✦ Consider and balance potential conflicts between these criteria.

5.45 The TAN also documents a definition of 'character', which is contained within the guidance on designing in context and reads as follows:-

'.....Appraising "character" involves attention to topography; historic street patterns, archaeological features, waterways, hierarchy of development and spaces, prevalent materials in buildings or floorspace, architecture and historic quality, landscape character, field patterns and land use patterns, distinctive views (in and out of the site), skylines and vistas, prevailing uses and plan forms, boundary treatments, local biodiversity, natural and cultural resources and local distinctive features and traditions (also known as vernacular elements).'

5.46 The TAN goes on to state that opportunities for innovative design will depend on the existing context of development and the degree to which the historic, architectural, social or environmental characteristics of an area may demand or inhibit a particular design solution. Thorough appraisal of context can provide design pointers, which help to inspire an innovative design response, which meets present and future needs. A contextual approach should not necessarily prohibit contemporary design.

TECHNICAL ADVICE NOTE 16: SPORTS, RECREATION AND OPEN SPACE (2009)

5.47 This Technical Advice Note (TAN) was published in January 2009 and its purpose is to advise on the role of the planning system in making provision for sport and recreational facilities and informal open spaces, as well as protecting existing facilities and open spaces in urban and rural areas in Wales (Para 1.1). The TAN states that young people's recreational needs are a priority, improving levels of physical activity and access to facilities in and outside schools (Para 1.9).

TECHNICAL ADVICE NOTE 18: TRANSPORT (2007)

5.48 TAN 18 confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development and that it can help the Assembly Government achieve its wider sustainable development policy objectives. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.

TECHNICAL ADVICE NOTE 23: ECONOMIC DEVELOPMENT (2014)

5.49 The TAN provides guidance on assessing the economic benefits of new development to the local and national economy and promotes the creation of sustainable and more equitably distributed economic development.

MERTHYR TYDFIL LOCAL DEVELOPMENT PLAN 2016-2031

5.50 The development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 is the adopted Local Development Plan (LDP) which was adopted in January 2020. The LDP forms the statutory framework for the development and use of land within the Borough and as such is the development plan against which any application will be assessed.

5.51 The relevant LDP policies are as follows:

Improving our Social Well-being

-  Policy SW1: Provision of New Homes;
-  Policy SW2: Provision of Affordable Housing;
-  Policy SW3: Sustainability Distributing New Homes;
-  Policy SW4: Settlement Boundaries;

- 📖 Policy SW9: Planning Obligations;
- 📖 SW10: Protecting and Improving Open Spaces; and,
- 📖 SW11: Sustainable eDesign and Placemaking.

Improving our Environmental Well-being

- 📖 Policy EnW1: Nature Conservation and Ecosystem Resilience;
- 📖 Policy EnW4: Environmental Protection; and,
- 📖 Policy EnW5: Landscape Protection.

Improving our Cultural Well-being

- 📖 Policy CW1: Historic Environment.

SUPPLEMENTARY PLANNING GUIDANCE (SPG)

5.52 The Council has produced a number of SPG documents in support of the LDP, those that are considered to be of relevance are as follows:

- 📖 Guidance Note No. 1 – Affordable Housing;
- 📖 Guidance Note No. 2 – Planning Obligations;
- 📖 Guidance Note No. 4 – Sustainable Design; and,
- 📖 Guidance Note No. 5 – Nature and Development.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

5.53 The Community Infrastructure Levy (CIL) allows local planning authority's to fund infrastructure needed to support growth through the imposition of a levy on each square metre of new floor space created by certain types of development. The Community Infrastructure Levy replaces a number of planning obligations, although it is still used to secure some contributions such as affordable housing provision.

5.54 The Community Infrastructure Levy comprises of two distinct but related components, the charging schedule and the regulation 123 list. The Community Infrastructure Levy was introduced to provide developers with greater certainty by stipulating the levy amount, and identifying the infrastructure that it will fund. The Government has also introduced restrictions on the number (up to a maximum of 5) of planning obligations that can be pooled together to fund a single infrastructure project with a view to encouraging authorities to implement the Levy.

5.55 The Merthyr Tydfil County Borough Council Community Infrastructure Levy Charging Schedule was adopted in June 2014.

5.56 The adopted Community Infrastructure Levy Charging Schedule confirms that the site is located within the Merthyr Tydfil Sub Mark Area where a CIL of £25 per square metre is applicable.

6.0 APPRAISAL

OVERVIEW

6.1 This section will discuss the key considerations that are fundamental to the principle of development. These key considerations can be summarised as follows:

- ✎ Is the principle of development and the delivery of affordable housing on the site acceptable?
- ✎ Is the density, design, layout and appearance of the development acceptable?
- ✎ Is the principle of development acceptable in all other respect or any other material considerations?

6.2 The following sections will consider the principle of development having regard to the questions listed above.

Is the principle of development and the delivery of affordable housing on the site acceptable?

6.3 Objective 1 of the Development Plan is *to encourage a sustainable level and distribution of population growth*. This is supported by Objective 3 of the Development Plan that seeks *to ensure the sufficient provision of land for the delivery of a range and choice of housing and affordable housing to address local need*. These objective are achieved through Policy SW1 – Provision of New Homes, in that the Council recognises that it must deliver 2,821 additional dwellings over the plan period to support population grown and to address existing housing need. Policy SW3 – Sustainably Distributing New Homes is a permissive policy that seeks to support the objectives of Policy SW1 through ensuring the supply of residential development. It seeks to ensure that new homes will be concentrated within the main settlement of Merthyr Tydfil, identified as the Primary Growth Area.

6.4 The proposed development is located within Twynyrodyn on land which is within the Primary Growth Area. This site is allocated for residential development by virtue of Policy SW3 in the form of allocation SW3.18. Allocation SW3.18 responds to Objective 4 of the Development Plan relating to regeneration which seeks *to promote the suitable ruse of previously developed land and the continued regeneration of local communities*. The allocation anticipates delivery of 120 units on the site, with the projected delivery of 30 units per annum between

2021 and 2024. That being the case, the principle of residential development is acceptable.

- 6.5 The Council has identified that over the course of the plan period 253 affordable housing units are required and Policy SW2 – Provision of Affordable Housing seeks to ensure that development proposal will contribute to the provision of affordable housing. Policy SW9 – Planning Obligations sets out the threshold at which development should make provision for affordable housing and the proportion of development that should be affordable, as well as reiterating the Council's adoption of the Community Infrastructure Levy. On sites within the Primary Growth Area, Policy SW9 indicates that on scheme in excess of 10 units, 10 percent of the development should be affordable units whilst at the same time having regard to development viability.
- 6.6 The development includes provision of affordable housing in the form of 13 on site affordable homes. That equates to a 10 percent provision, as required by the provision of Policy SW9. That being the case, the proposal is acceptable by virtue of Policy SW9 insofar as affordable housing provision is concerned.
- 6.7 The propose development is a residential development on land that is identified for residential development. Therefore, the proposal is compliant with the Development Plan framework that seek to promote the delivery of residential development on this site. Similarly, the scheme delivery 10 percent provision of affordable housing as required by the Development. It is therefore considered that the principle of development and the delivery of affordable homes is acceptable.

Is the density, scale, layout and appearance of the development acceptable?

- 6.8 Objective 6 of the Development Plan is *to promote high quality, sustainable and inclusive design and support measures which mitigate the predicted effects of climate change*. This is supported by the Council's overarching in relation to design, Policy SW11 – Sustainable Design and Placemaking which seeks to meet Objective 6 in the design of new development. Policy SW11 seeks to ensure that development contributes to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. It requires, inter alia; that development respond to local context in terms of scale, layout, appearance and

density; integrates effectively with adjacent environments; negates unacceptable impact on local amenity; incorporates a range of dwellings and tenures to meet local need; demonstrates appropriate access; and, includes provision for green infrastructure.

- 6.9 As illustrated in the supporting Design and Access Statement, the design, layout and appearance of the proposal has had regard to the site and surroundings in order to ensure quality design to the development. It illustrates how the proposal has responded to the site constraints in the proposal. One such example is the retention of the bridal way that bisects the site, with drainage features implemented along its route and the block plan fronting these features. That has enabled a linear connection through the site that promotes a positive and attractive link north south.
- 6.10 Having regard to Policy SW11, the proposal responds appropriately to the local context in terms of scale and appearance. Principally consisting of two detached and semidetached dwellings, the development will utilise a material palette consistent with the surrounding residential development. The density is in line with the anticipated level as set out in SW3 and akin to neighbouring development. The arrangement within the site ensures that the neighbouring development and entrance to the proposal fronts existing development to ensure an active and engaging front of development. The proposal's scale and appearance will not have an unacceptable impact on local amenity through loss of light or privacy and provides appropriate landscape design to ensure integration. Green infrastructure is supported along the linear sustainable drainage feature through appropriate planting and integrated throughout the development through corridors of landscaping and other pockets. The proposal includes a range of dwelling, both in terms of size and number of bedroom, from two to four bed properties.
- 6.11 The quality and potential for retention of all site trees has been considered. A proportion of the existing vegetation is to be retained, a principle which has aided the formation of a landscaping strategy. It is considered that the strategy demonstrates how the existing natural character of the site can be retained and enhanced to create a desirable and attractive development.

IMPACT ON THE HIGHWAY NETWORK

- 6.12 The Transport Assessment that accompanies this application has analysed the potential impact of the development on the local highway network. It has borne in mind the various services and amenities on offer in proximity to the site and concluded that the presence of local bus stops and schools will contribute to reducing the reliance on private motorised vehicles.
- 6.13 There have been a total of 12 accidents within the study area that occurred within the most recent five-year period, resulting in 22 casualties. These are dispersed throughout the study area, and the maximum number of accidents that occurred in any 12-month period was four. It is therefore, considered that there are no existing road safety issues that would be exacerbated by the proposed development.
- 6.14 The site has good access to local schools, shops and public facilities, the majority of which are within walking or cycling distance. A travel pack is to be provided with each new dwelling to promote sustainable travel choices.
- 6.15 The Transport Assessment indicates, considering modal split, that the development would generate 78 vehicle movement (two-way) in the AM peak and up to 94 vehicle movements (two-way) in the PM peak. When modelled against the existing highway network, over the seven relevant junctions identified, two exceed the five percent threshold outline in TAN18 as being a material increase. Additional analysis indicates that both junctions have sufficient capacity to accommodate the likely increase in traffic flows as a result of both background growth (to 2032) and the proposed development.
- 6.16 It is therefore, considered that based on the sites location and allocation within the LDP the proposed development can be accommodated on the highway network.

IMPACT ON ECOLOGY

- 6.17 An Extended Phase 1 Habitat Survey has been performed to establish the ecological baseline of the site. Following the survey a report was prepared which confirmed that the site comprised of grassland areas surrounded by woodland with a small number of mature / semi – mature trees, and was not subject to any international or national designations. These habitats were deemed capable of accommodating reptiles and foraging bats, and as such a Reptile Survey were

performed. These reports, which inform the application, identified a suite of mitigation measures that should be implemented to reduce the impact of the development during the construction phase and post-construction.

- 6.18 The mitigation measures proposed are discussed in detail in the Reptile Strategy, Biodiversity Enhancement & Management Plan, and Construction Phase Management Plan.
- 6.19 In light of the above, density, scale, layout and appearance of the development acceptable

AIR QUALITY

- 6.20 In January 2017 the Council declared an Air Quality Management Area (AQMA) at Twynyrodyn Road, which is proximate to the development site. The Council's Air Quality Action Plan (2018) seek to propose measures to improve air quality within the AQMA. Policy EnW4 seeks to ensure development proposal will not result in an unacceptable impact on people, residential amenity and the natural environment from inter alia pollution of the air. The latest Air Quality Progress Report (2020) highlights that the strategy of reversing traffic flows along Ponmorlais High Street and Church Street has resulted with fewer queues developing on Twynyrodyn Road. The reversal has not significantly increased levels of NO₂ along Pontmorlais Street or any other diversion route. The success of the reversal, coupled with changes in travel habits post the coronavirus pandemic is such that the AQMA may be revoked in 2022 if continued monitoring confirms the same.
- 6.21 The application is supported by an Air Quality Assessment that reviews the potential impacts of development from both a construction phase and post completion perspective. The report is modelled on a development of approximately 127 units. Paragraph 5.2.10 through 5.2.14 models the sensitivity to number of properties occupied in early years of the development and at paragraph 5.2.13 models an addition of 10 percent unit numbers (<140 unit) and concludes that there would be no substantive change from the main assessment of 127 units.
- 6.22 During the construction phase of the development the report identifies potential risk from dust impacts, but indicates that this can be controlled and mitigated

through appropriate planning conditions. Post development impacts are identified as being traffic generated. Active travel routes are promoted through the site layout, including key permeability routes that enable access to public transport and the town centre/local amenities to reduce the reliance on private vehicle movements. In addition, there has been a substantive shift in traffic patterns and behaviours post the coronavirus pandemic. There is now a significant shift to home working or hybrid arrangements which further reduce the need to travel.

Is the principle of development acceptable in all other respects?

- 6.23 In addition to the proposal compliance with the development plan, as assessed above, the development will also provide for the following benefits. Persimmon Homes is committed to the development of this site promptly should planning consent be forthcoming.

ECONOMIC BENEFITS

- 6.24 An Economic Toolkit was developed by Lichfields to generate an estimate of the headline economic benefits arising from new residential development. The toolkit demonstrates the intrinsic economic value of a proposed development and is intended to inform discussions with Local Planning Authorities and the local community. Within this context, the toolkit – which draws upon industry-recognised datasets and methodologies – provides a robust methodological approach, which can assist in estimating the headline economic impacts associated with a development.

CONSTRUCTION IMPACTS

- 6.25 The proposed development represents an estimated capital investment of £15,313,520 over a 3 year construction period. The additional value of the development can be assessed through its contribution to local GVA – a measure of the value that a specific sector or industry adds to the local economy. It is estimated that the scheme will deliver an additional £15,201,684 of GVA over the build period.

EMPLOYMENT

- 6.26 Applying the average turnover per worker in the construction sector in Wales to the estimated construction cost indicates that the development would be expected to create 88 direct FTE construction jobs person-years of construction. Indirect

and induced FTE jobs supported per year of construction equates 119. The initial direct spending can result in substantially larger economic benefits as this expenditure is transmitted through the economy in the form of:

- ✦ Purchases from a range of suppliers who, in turn, purchase from their own suppliers through the supply-chain (indirect jobs); and,
- ✦ Temporary increases in expenditure linked to the direct and indirect employment effects of the construction phase (induced jobs).

The estimated gross value added per annum of the construction impact equates to £15,720,787.

RESIDENTIAL EXPENDITURE IMPACTS

- 6.27 The economic benefits of the proposed development will not be limited to the construction period. Rather, it will create an opportunity to increase local expenditure by residents within the locality and the wider Borough.

OPTIONAL EXTRAS TOTAL SPEND

- 6.28 The optional extras total spend for a development of this magnitude is estimated to be in the order of £524,000.

FIRST OCCUPATION EXPENDITURE

- 6.29 The average person spends £5,500 making their house 'feel like home' within a year and a half of moving into a property. Drawing upon this research, we estimate that new residents to the site will spend a total of £720,500 on their homes within the first 18 months of occupation.

TOTAL GROSS EXPENDITURE

- 6.30 A measure of the total expenditure associated with the proposed development can be obtained through a review of the characteristics of the area in terms of average expenditure patterns and levels. Taking account of the open market and affordable components of the scheme, the Office for National Statistics (ONS) Family Spending Survey (2020) indicated that the total expenditure from all residents within the development is expected to be £3,895,102 per annum.

COUNCIL TAX RECEIPTS AND CIL

- 6.31 The proposed development will generate an estimated £218,377 in Council Tax each year following completion. This addition income would be used to fund Council services.

6.32 In addition to the annual income from Council Tax, the development will be subject to a CIL payment. That payment can fund any of the infrastructure set out in the Council's Infrastructure List.

7.0 CONCLUSION

- 7.1 This Planning Statement has been produced in support of an a full planning application for the residential development and associated works on land off Elm Tree Grove, Twynyrodyn, Merthyr Tydfil.
- 7.2 The application is submitted in the context of the site being an allocated site in Merthyr Tydfil's Local Development Plan. The Site is a brownfield site which when regenerated will provide Merthyr Tydfil with good quality private homes and aid with Merthyr's affordable housing delivery.
- 7.3 The analysis section of this statement has shown that the policy context is supportive of the principle of development at this location owing to the preference for the re-use of previously developed land; the site is allocated and located in close proximity of the amenities and services of Merthyr Tydfil; and there is a range sustainable modes of transport located within a short walk of the proposal.
- 7.4 The sustainable credentials of the site are compounded by the surveys and reports that have been prepared in support of the application which demonstrates that the proposals is capable of delivery economic investment, growth, jobs and much needed housing with limited impact on the ecological features of the site, the wider landscape or the highway network.
- 7.5 For the reasons outlined above, it is the conclusion of this planning statement that the site represents a sustainable development that can be justified on the basis of the need to increase the supply of housing. On that basis, Persimmon Homes would respectfully request that officers recommend the application for approval.