

Our Ref: 24.230
Date: 29 October 2025

Planning Services
Unit 5 Triangle Business Park
Pentrebach
Merthyr Tydfil
CF48 4TQ

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS
Tel: 02920 732 652
www.asbriplanning.co.uk

Dear Sir or Madam,

Town and County Planning Act 1990 (As Amended)

Full planning application for the erection of Passivhaus modular residential units, laundry, bin store, landscaping, parking and associated works

Car park at Hornbeam Close, Gurnos, Merthyr Tydfil, CF47 9BW

Planning Portal Ref. PP-14133557

Asbri Planning is appointed as planning agent to Merthyr Valleys Homes to submit a full planning application in relation to the above site. It is proposed to erect Passivhaus modular residential units with laundry, bin store, landscaping, parking and associated works.

The planning application has been submitted via Planning Portal, and comprises the following drawings, prepared by LeTrucco Architecture:

Drawing	Reference
Site Location Plan	T2509.00.01
Proposed Site Layout	LT2509.04.01 (Rev A)
Proposed Dwellings	LT2509.04.100 (Rev A)
Bin Store Details	LT2509.04.03
Proposed Site Sections	LT2509.04.02

In addition, the following documents are submitted:

Document (reference where applicable)	Prepared by
Application Form	Asbri Planning
Covering Letter	Asbri Planning
CIL Forms	Asbri Planning
Topographical Survey (001)	CornerPoint Surveys
Parking Survey Technical Note	Asbri Transport
Site Assessment Report	Ecological Services
Arboricultural Report	ArbTS
Noise Impact Assessment (P1366/REP01)	Formant
Detailed Soft Landscape Proposals (LB594_D01)	Laird Bailey Landscape Architects
Green Infrastructure Statement (LB594/R01)	Laird Bailey Landscape Architects

In addition, £1,925.00 shall be paid by the applicant in respect of the planning fee. This is calculated on the basis that the application relates to the development of 4no. new dwellinghouses.

Site Description

The site is located within the Gurnos in north Merthyr Tydfil and is centred on grid co-ordinates E: 304490, N: 208561. It spans an area of approximately 710m². The site comprises a rectangular concreted area which is bordered by a grass verge, with a number of trees located on the verge of the northern boundary and one tree on the grass verge at the southern boundary. The current purpose of the site is a car park; however, it is infrequently used. As such, it is therefore considered to be previously developed (brownfield) in nature.

Local Context

In terms of local context, the site is located within a largely residential area, with dwellings surrounding the site to the east, south and southwest. The Gurnos Ring Road is located to the north of the site. In respect of local amenities, the site is within walking distance to the following facilities:

- Prince Charles Hospital – 0.4 miles to the south
- Funtazia Day Nursery – 0.6 miles to the south
- 3Gs Development Trust – 0.8 miles to the south
- The Trussell Trust Food Bank – 0.8 miles to the south
- Pen-Y-Dre High School – 0.6 miles to the east
- St Aloysius Church – 0.7 miles to the south-east
- Compass Community Hub – 0.3 miles to the south-west
- Shemek's Neapolitan Pizza – 0.5 miles to the south-west

Access and Highways

The site has existing vehicular access via Hornbeam Close, which adjoins Fernhill Close. Pedestrian access can also be gained via Hornbeam Close, with existing footpaths found along Gurnos Ring Road and Fernhill Close.

In terms of public transport provision, the closest bus stop is located some 0.2 miles to the west of the site along Gurnos Ring Road. Here, passengers can access Merthyr Tydfil town centre, Bargoed, Pontsticill, Pontllytyn, Newport and Aberdare via various bus services, which operate throughout the day (Monday to Saturday, with limited bus services available on Sundays). Merthyr Tydfil train station is located approximately 2.2 miles to the south of the site, in the town centre. From here, passengers can access destinations such as Cardiff and Pontypridd, with services operating every 30 minutes.

In addition, active transport is facilitated by footpaths on Hornbeam Close and on the Gurnos Ring Road boundary. Tactile paving is in place at the junction between Gurnos Ring Road and Fernhill Close to assist pedestrians, and Fernhill Close is subject to a 20mph speed limit to facilitate pedestrian and cyclist safety.

Public Rights of Way



Figure 1: Bing OS Map

A review of Ordnance Survey mapping indicates that no Public Rights of Ways are located on the site. However, according to the topographical survey produced by Corner Point Surveys, there is a footpath located along the northern and south-eastern boundary of the site.

Flood Risk

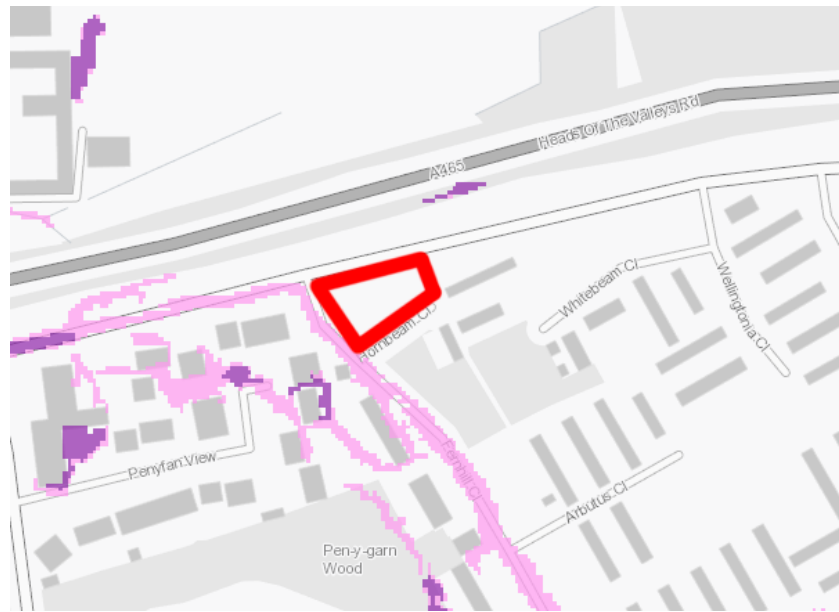


Figure 2: Flood Map for Planning

The Flood Map for Planning has recently been adopted under TAN 15 (Development and Flood Risk). It is based on the most up to date information from a flood risk perspective and is used to inform planning decisions. A review of the Flood Map for Planning indicates that the site lies outside Flood Zones 2 and 3 for flooding by rivers and seas, in addition to surface water and small watercourse flooding.

Historic Environment

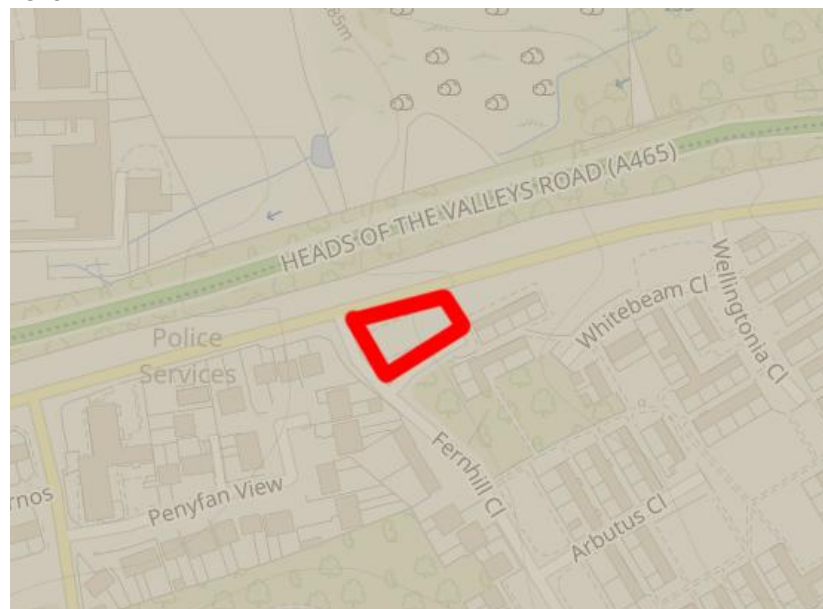


Figure 3: Cadw Historic Records Map

A review of Cadw's historical map confirms there are no Listed Buildings or Scheduled Monuments within the site boundary. The nearest designated historical assets are Cyfartha Castle and School, which are situated approximately 1.5 miles away from the site. The site is also located within the Registered Historic Landscape of Merthyr Tydfil (Ref: HLW(MGL)2).

Planning History

A review of Merthyr Tydfil County Borough Council's (MTCBC) online planning archive records identifies no previous relevant applications at the site.

Pre-application Advice

A pre-application enquiry was submitted to MTCBC on the 25th November 2024. Following this, a pre-application meeting took place on the 12th of December 2024 with Case Officer Kate Glover. A subsequent written response was received on the 19th of December 2024.

The written report provided the following advice in relation to the main material planning considerations:

Principle of Development

The site is within the settlement boundary where residential development would normally be acceptable in principle subject to the proposals compatibility with other plan policies and material considerations.

Character and Appearance

The dominant external material should be render so that the development reflects the use of render on dwellings at Hornbeam and Whitebeam Closes. The proposed flat roofs differ from that of the neighbouring properties (pitched roofs). The introduction of another building form will need to be justified as part of the proposal. The site layout, in particular the site's frontage that includes a laundry building, should be justified and supported with visual information to ensure the site does not appear cluttered and the site would be appropriately integrated into the area. The site would benefit from hedge and tree planting to soften the appearance and provide modest screening from public view points (also contributes to biodiversity enhancement). Further consideration on the visual appearance will be given when full drawings of the proposal are submitted with any future planning application.

Residential Amenity

The proposed dwellings do not give rise to any serious concerns with regard to matters of potential overbearing or overlooking concerns. The site is within 14m of the boundary of the Trunk Road. So any potential detriment on residential amenities of the future occupants caused by Trunk Road noise needs to be considered. You may wish to provide a noise assessment to determine any potential mitigation measures, although this is not anticipated to be a significant concern given the established residential nature of the area. Careful consideration will need to be given to loss of privacy to the neighbouring dwellings and further information on distances. Any future application will need a detailed block plan and sections which illustrate the development in relation to neighbouring properties. Neighbouring residents would be consulted and any representations received following the publicity exercise would be a material planning consideration. You may wish to discuss proposals with the neighbours prior to submitting a planning application.

Parking and Highway Safety

Loss of the parking area and impact on parking arrangements for nearby dwellings will be a material planning consideration. Any future planning application will need a parking survey which justifies the loss and impact on public parking area. No concerns raised in respect of the principle of an access/egress at Hornbeam Close. The pedestrian access point on the north side does not meet with DDA requirements. Understood that this matter can be resolved and the introduction of a ramped access would be explored. Three of the four general parking spaces would measure 2.5m by 4.8m, the fourth space would measure 3.0m by 4.8m – these dimensions are acceptable. Concern has been raised over the proposed disabled parking space which would measure 2.5m by 4.8m and is too narrow. All parking and turning arrangements have to meet CSS Wales/CSS Cymru, Wales Parking Standards (2008).

Impact on Ecology

During the construction phase, the trees and their root systems need to be protected. Any future planning application needs details on the method(s) of protection that will be provided. The Council's Ecologist advises

that the formal planning application should include a brief Preliminary Ecological Appraisal (PEA) (undertaken by a suitably qualified and experienced ecologist). This must provide sufficient information for the LPA to assess any potential adverse impacts on priority and protected species and/or habitats, or to identify what further information is required before a full assessment is possible. A GI Statement must be submitted with the planning application. The site appears to have limited ecological value and, subject to the finding of the PEA, it is likely that the GIS can be modest. Enhancement is required, in line with the Environment (Wales) Act 2016.

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. CIL is chargeable on residential development in this part of the County Borough. Surface water drainage for new developments has to comply with legislation relating to SuDS. This may require you to submit a separate SAB application. The site is close to the Trunk Road - you may wish to discuss with SWTRA prior to submitting a formal planning application.

The written report concluded that the proposal may be acceptable in general terms. However, it noted that further information identified above would also be required to demonstrate that an acceptable form of development can be achieved within the site.

Proposals

The proposed development comprises of 4no. modular residential units and associated works. The units are proposed to provide homes for individuals who are in need and want to work, and will contribute to addressing homelessness issues in Merthyr Tydfil. The units comprise affordable housing, the proposed development will therefore contribute to addressing an identified need and is fully supported by the Local Authority's housing team.

As demonstrated on the Proposed Site Layout, plots 1, 3 and 4 each contain a bedroom, bathroom, living space, kitchen and dining room. Plot 2 contains two bedrooms and a kitchen, living and dining room, and bathroom. the modular dwellings are designed to meet Passivhaus standards of energy efficiency, quality and comfort in as little as six weeks. Moreover, Beattie Passive have a precedent of working with Housing Associations, Local Authorities, Architects and Developers to ease the housing crisis, prevent homelessness, end fuel poverty and achieve net zero in housing.

In addition, the development also proposes the addition of a bin area, laundry facilities, bike storage, four car parking spaces, one disabled car parking space, a shared garden, a sustainable path and a ramp (suitable for people with disabilities) to the lower-level footway and landscaping features.

The accompanying Soft Landscape Proposals and Green Infrastructure Statement show that the existing trees are to be retained to preserve the current green infrastructure. In addition, it is proposed to enhance the existing green infrastructure features by incorporating additional ground cover and tree planting to improve both ground and canopy connectivity. The site boundaries will also be enhanced with native and ornamental hedgerows, amenity grassland and wildflower planting, providing valuable habitat and promoting biodiversity. In addition, ornamental planting is proposed in the garden area for amenity value and further biodiversity enhancement.

Planning Policy

The development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises Future Wales: The National Plan 2040 and the adopted Local Development Plan for the administrative area, which in this instance is the Cardiff Local Development Plan, adopted in January 2016. The development plan is supported by national guidance contained in Planning Policy Wales (12th Edition) and Technical Advice Notes, in addition to local level Supplementary Planning Guidance.

Future Wales: The National Plan 2040

Future Wales: The National Plan 2040 (adopted in February 2021) establishes a national framework setting the direction for development in Wales to 2040. It forms a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

Policy 7 of Future Wales is in relation to Delivering Affordable Homes and states:

“The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through their Strategic and Local Development Plans planning authorities should develop strong evidence-based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.”

Future Wales separates the country into four regions. The site lies within the South East region. Policy 33 (National Growth Area – Cardiff, Newport and the Valleys) is therefore applicable which states:

“Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys’ strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.

The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys. The Welsh Government supports development in the wider region which addresses the opportunities and challenges arising from the region’s geographic location and its functions as a Capital Region”.

Local Development Plan

The development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 is the adopted Local Development Plan which forms the statutory framework for the development and use of land within MTCBC. The LDP was adopted in January 2020.

The LDP proposals map reveals that the site lies within the settlement boundary for Merthyr Tydfil (as shown in figure 5). As such, is in an area where development is normally permitted. Notwithstanding, a portion of the front of the site is allocated as land safeguarded for the dualling of the A465 in accordance with Policy SW12, as illustrated above. The alignment of the allocations appears arbitrary and cuts through some existing buildings.

The LDP planning policies considered relevant to the determination of this planning application are contained in the table below:

Policy	Relating to
<i>Improving our Social Well-being</i>	

SW1	Provision of New Homes
SW2	Provision of Affordable Homes
SW3	Sustainably Distributing New Homes
SW4	Settlement Boundaries
SW9	Planning Obligations
SW11	Sustainable Design and Placemaking
SW12	Improving the Transport Network
<i>Improving our Environmental Well-being</i>	
EnW1	Nature Conservation & Ecosystem Reliance
EnW3	Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species
EnW4	Environmental Protection

Planning Policy Wales (12th Edition)

National planning policy is contained within the 12th edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2024. It constitutes guidance for Local Planning Authorities (LPAs) and decision-makers and sets out the Government's planning policies for Wales and how these are expected to be applied. The planning system is central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage the use and development of land in the public interest which is consistent with key sustainability principles. Key sections relevant to this proposal include the following:

Section 3 - Strategic and Spatial Choices

"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 might live and work and which areas should be protected. These crucial, early decisions will have the greatest impact on the type of development which is ultimately delivered and its contribution to sustainable development and the environmental, social, cultural and economic well-being of Wales".

In respect of previously developed land, paragraph 3.55 states: "Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome".

Section 4 - Active and Social Places

"Active and Social Places are those which promote our 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".

Paragraph 4.0.2 is particularly pertinent to this proposal. It reads: "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".

Paragraph 4.1.1, regarding transport, is also an important consideration for this proposal. It affirms that “the planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport”.

In respect of housing, paragraph 4.2.1 states that “New housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities”.

Section 6 – Distinctive and Natural Places

Paragraph 6.2.12 of PPW 12 states that: “A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied.”

Technical Advice Notes

The following Technical Advice Notes (TANs) adopted by Welsh Government are also considered to be of relevance to this application:

- TAN 2: Planning and affordable housing (June 2006)
- TAN 11: Noise (October 1997)
- TAN 12: Design (March 2016)
- TAN 18: Transport (March 2007)

Supplementary Planning Guidance

The following Supplementary Planning Guidance notes are considered to be relevant to this application:

- Affordable Housing (March 2012)
- Planning Obligations (March 2012)
- Sustainable Design (July 2013)
- Nature and Development (May 2015)

Planning Considerations

This section identifies the main issues relevant to the consideration of this change of use application and assesses the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- The **principle of development** in terms of development plan policy and other planning context
- The impact on the **character and appearance** of the surrounding area
- The impact of the development on **residential amenity** of surrounding properties
- The impact of the development in terms of **parking and highway safety**
- The impact of the development on **ecology and green infrastructure**
- The **planning obligations** associated with the development

Principle of Development

The site is located within the settlement boundary for Merthyr Tydfil, as demonstrated within LDP policy SW4. A small portion at the front of the site is allocated as land safeguarded for the dualling of the A465 (LDP policy SW12). Nevertheless, the alignment of the allocations appears to be arbitrary, as it cuts through existing buildings and the dualling works have now been completed. As such, the site is considered to be largely within an area whereby development is generally viewed favourably under policy SW4.

In addition, the need for residential dwellinghouses for individuals in need or at risk of homelessness is well recognised, as demonstrated by MTCBC's Local Housing Market Assessment 2022-2037. This document outlines the Rapid Rehousing Transition Plan (RRTP), which focuses on the prevention of homelessness. Where prevention is not appropriate, the plan states that stable housing and support should be provided through a range of models, to reduce overreliance on emergency unsuitable accommodation and move people into safe and suitable homes. The proposed development will contribute to addressing homelessness issues in Merthyr Tydfil by providing 4 no. homes for those in need.

As such, it is considered that the principle of development is well established by planning policies SW1 and SW2, and other relevant evidence contained within the Local Housing Market Assessment 2022-2037. The principle of development was confirmed to be acceptable within the pre-application enquiry.

Residential Amenity

The proposed development will not generate significant operational noise levels itself, given its residential nature. However, the site is located approximately 40m to the south of the A465 Heads of the Valleys Road. As such, this application is accompanied by a Noise Impact Assessment, which has evaluated the potential impact of noise from the A465. This Assessment found that the site falls between Noise Exposure Categories B in TAN 11, meaning that noise is a material consideration for planning. Notwithstanding, noise levels in the proposed gardens were predicted to be within the BS 8233 guidelines, therefore no adverse noise impacts are predicted as a result of noise levels in external amenity spaces. Furthermore, it was concluded that no significant adverse noise impacts are predicted as a result of environmental noise break-in. On this basis, it is considered that the development is acceptable in terms of noise, in line with TAN 11 and LDP policy EnW4.

It is not considered that the development would have any detrimental impact in relation to overbearing or overlooking, as confirmed within pre-application discussions. Furthermore, the proposed development will not result in significant adverse impacts in relation to loss of privacy or light for the neighbouring dwellings, as illustrated within the accompanying site sections plan. It is not considered that the proposed development would result in any detrimental visual impact, given that the site's existing and previous use as a car park, which has been previously used to store containers relating to the A465 works.

In light of the above, it is considered that the proposed development will not cause a detrimental impact in relation to residential amenity, in accordance with policy SW11 and national planning policy.

Character and Appearance

Policy SW11 of the LDP requires development to contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. TAN 12 (Design) also advises that development should sustain and enhance local character. Given that the site's surroundings are largely residential (comprising a high proportion of social housing), it is considered the proposed development is appropriately located within Hornbeam Close in accordance with the aforementioned policies.

As illustrated within the accompanying elevations, the external walls will largely comprise Steni aggregate faced board in whisper white, with techwood wood effect composite board in tudoe black utilised as feature walls. The roof covering is a single ply polymner based roofing membrane in grey. The plinth and fascia will be finished in black UPVC and black aluminium, respectively. The windows shall be triple glazed in black UPVX frames, and the front doors will be constructed from UPVC/composite materials. The appearance of the proposed dwellings differs to that of the existing properties, the modular dwellings are designed to meet Passivhaus standards of energy efficiency, quality and comfort in as little as six weeks. Moreover, Beattie Passive have a precedent of working with Housing Associations, Local Authorities, Architects and Developers to ease the housing crisis, prevent homelessness, end fuel poverty and achieve net zero in housing. The design also incorporates a DDA compliant pathway to the existing footway. As such, their appearance is different to existing dwellings by virtue of

their sustainable quality, which aligns with policy SW11's promotion of incorporating a mix of house types, utilising sustainable design and construction techniques and including inclusive design.

It is further considered that there is no overarching architectural character within the local area, as the properties feature a mix of designs, but offer little architectural interest. For example, the dwellings to the east on Hornbeam Close front Gurnos Ring Road comprise gable ended properties with rendered façades. Whereas, the dwellings to the west beyond Fernhill Close have their rear amenity areas facing the Ring Road and comprise red brick dwellings with varied roof styles. In particular, the introduction of a further (flat) roof type into the area is considered to be justified, given that there is already a variety of roof types within the immediate vicinity and the installation of the proposed units will not adversely impact the visual form of the area.

It is therefore considered that the application accords with policy SW11 and TAN 12.

Parking and Highway Safety

The application is supported by a Parking Survey Technical Note, produced by Asbri Transport. This Survey included on-street parking along Fernhill Close, Hornbeam Close, Arbutus Close and Crabapple Close, in addition to three off-street parking areas. It found that Hornbeam Close had an average occupancy of 12%, with a maximum of 17% at the peak times. Hornbeam Close was subject to the lowest percentage of occupation in comparison to the other surveyed areas. Notwithstanding, it was concluded that there were no parking issues present within the surveyed area, with ample capacity in the other parking areas to accommodate for the development of Hornbeam Close.

It is proposed that access to the site shall remain as per the existing access via Hornbeam Close, with a new sustainable ramp (for people with disabilities) and pedestrian path proposed to be installed to connect the development to the lower footpath. This shall provide enhancements in terms of sustainable travel links and active transport opportunities, in accordance with policy SW12.

As demonstrated by the accompanying site plan, a total of 4no. general parking spaces, 1no. disabled parking space and a cycle store are proposed. The disabled parking space measures 3m by 4.8m. Whilst this is slightly narrower for the standard dimensions noted by CSS Wales/CSS Cymru Parking Standards (2008), there is a grassed area to the side of the parking space, to provide additional space.

In light of the above, it is considered that the proposed development will not result in any significant detrimental impact on parking or highway safety in line with the relevant Parking Standards, and will also provide benefits to sustainable and inclusive active travel links.

Ecology and Green Infrastructure

This application is accompanied by a Site Assessment Survey (prepared by Ecological Services Ltd), which comprises a desktop study and site visit to assess the potential ecological impacts of the proposed works. It concluded that the habitats within the site are considered to have biodiversity value at a local level only. It noted that the development would likely result in the loss of an area of concrete hardstanding, with the vast majority of grassland and all trees to be retained. Notwithstanding, it acknowledged that there may be some temporary disturbance to the land during construction works.

In light of this, a number of recommendations were provided within the Site Assessment Survey to mitigate against the potential concerns associated with the development of the site. This document recommends that external lighting should be directional, hooded or cowled, and operated via motion sensors and timers to prevent unnecessary light spill, in line with BCT Guidance Note 08/23 on bats and artificial lighting. This approach is designed to reduce disruption to nocturnal wildlife, particularly foraging bats and invertebrates. To protect terrestrial mammals such as hedgehogs, it recommends that any excavations left unattended should be securely covered, and those deeper than 0.5m should include escape ramps, such as a wooden board angled no steeper

than 45 degrees. Existing trees on site, which may be used by nesting birds, are not planned to be removed. However, if active nests are discovered, a minimum buffer zone of 5 metres must be maintained until chicks have fledged, with larger buffers applied where necessary based on species and habitat. Additionally, it recommends that compensatory planting should be incorporated into the site plans, including a variety of native, pollinator-friendly species, locally sourced native trees, and hedgerows where feasible. Plant species should be carefully selected to suit the urban conditions of the site, and a detailed planting scheme will be provided to support future planning applications.

Under the Environment (Wales) Act 2016, MTCBC has a duty to conserve and enhance biodiversity. To support this, it is recommended that at least two of the following biodiversity enhancement measures be implemented on-site: the installation of a bird box (e.g. 1B Schwegler or similar woodcrete model) positioned at least 3 metres high and away from south-facing aspects to avoid overheating; the installation of three bat boxes (e.g. 2FN Schwegler or equivalent), grouped on a single pole at least 3 metres above ground with no obstructions within 30cm of their bases; the incorporation of 13cm x 13cm gaps every 3 metres along any new fencing to facilitate movement of reptiles and small mammals; and the use of native species in soft landscaping, which should also be managed appropriately to maintain its value for wildlife.

In addition, this application is supported by an Arboricultural Report (prepared by ArbTS), which provides details regarding the protection of the existing trees and the area's amenity. The Report demonstrates that the proposed development will not interfere with the root protection area of any of the retained trees, in accordance with policy SW11 and section 6 of PPW12.

Soft Landscaping Proposals and a Green Infrastructure Statement (prepared by Laird Bailey Landscape Architects) were also submitted as an accompaniment to this planning application, as required by section 6.2.12 of PPW 12. As aforementioned, the scheme will accord with step 1 (avoid) of the stepwise approach detailed in section 6.4.14 of PPW 12, as the vast majority of the existing green infrastructure (including all trees) shall remain in situ. Furthermore, the development proposes a number of biodiversity enhancements such as the planting of native and ornamental hedgerow, wildflower areas, amenity grassland, ornamental plants and 7no. additional trees. These additional features will increase the biodiversity and amenity value of the site, improve the connectivity of the green infrastructure and provide benefits in relation to amenity and visual appearance. The implementation of these landscaping features aligns with LDP policy SW11, which requires new development to incorporate a good standard of landscape design and contribute to the provision of green infrastructure.

In light of the above, it is considered that the proposed development would have a minimal impact on the existing biodiversity and green infrastructure in line with both national and local planning policy.

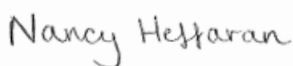
Planning Obligations

Given the nature of the proposal, it was agreed within the pre-application enquiry that an on-site provision of affordable housing or open space, or a financial contribution towards affordable housing would not be sought. Notwithstanding, the appropriate CIL forms have been completed and submitted to accompany this application.

Conclusion

I trust that the submitted documents allow the application to be validated and look forward to receiving details of the name of the case officer, application reference number and target determination date. If you have any queries in the meantime, please do not hesitate to get in touch.

Yours sincerely,



Nancy Heffaran
Graduate Planner

