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Planning Application to MTCBC

for

Development of a car parking area for the use of Merthyr Motor Auction at The Hafod,

Dowlais

PLANNING SUPPORTING STATEMENT

July 2021 (Rev. Sept 2021)

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1. INTRODUCTION:

- 1.1 This statement supports the planning application to Merthyr Tydfil County Borough Council (MTCBC) for a site known as 'The Hafod' (or Site 'C') referred to as 'the site' from this point forward. The site is immediately to the north of the existing car park of Merthyr Motor Auction (MMA) and is proposed as an extension to the existing car park to accommodate domestic scale vehicles, staff and customer parking for MMA after the A465 road widening works reduce the area of the existing MMA car park.
- 1.2 MMA is a family motor auction business established in 1978 operating from one site at Pant Road, Dowlais. The existing MMA site and business is directly affected by the widening of the A465 and associated Compulsory Purchase Order (CPO).
- 1.3 MMA provides significant local employment opportunities for 38 long serving permanent staff and consequential employment for around 70+ industries such as local body shops and food outlets. The existing MMA site is shown in Appendix A, Plan 1.
- 1.4 This planning application addresses planning proposals that are directly related to the Welsh Government commitment to widen the neighbouring A465 road. A summary of the impacts of the widening works is provided in this document in terms of the compulsory acquisition of land as important context and background to this application.
- 1.5 This supporting statement takes the following form:
- Section 2 outlines the wider MMA site context and that of the proposed site.
 - Section 3 describes the MMA operation in detail.
 - Section 4 considers how the A465 works will affect the MMA operation and justification for the proposal.
 - Section 5 sets out the planning process background.
 - Section 6 presents a summary of the proposals in terms of materials, boundary treatment, security, lighting and access. Details of hours of operation and indicative layout are also provided.
 - Section 7 briefly summarises the national and local planning policy to be considered.

- Section 8 provides a review of the proposal against relevant planning policy and the MTCBC pre-application response.
- Section 9 concludes the statement.

1.6

There is significant planning history surrounding the MMA site and further details added from the current CPO. Due to the high level of information in circulation, every effort has been made to ensure this statement is as succinct as possible in dealing with this specific proposal however it is acknowledged the detail of the wider site is also required in order to view the proposal in the correct context. Should any further information be required please do not hesitate to contact Anna Cheney in the first instance annacheney@hrt.uk.com.

SITE LOCATION AND CONTEXT:

Context

- 2.1 The site is located in Merthyr Tydfil County Borough Council (MTCBC) in the settlement of Dowlais to the northeast of the town of Merthyr Tydfil.
- 2.2 Dowlais has a historic association with the local iron and steel works operated by Sir John Guest. Little now remains of the works and the settlement houses in the region of 6,900 (2011) inhabitants. Dowlais provides a range of local everyday amenities and services including a bar/restaurant, hot food takeaways, green grocer, convenience store and sandwich bar/café.

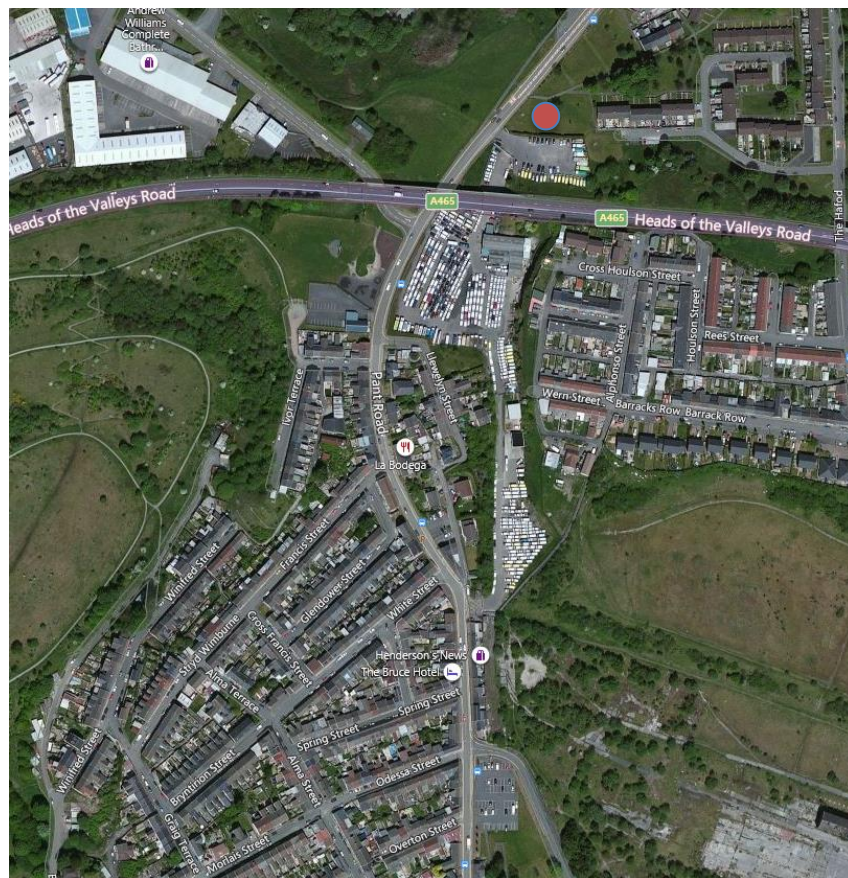


Image 1 - From Bing Maps June 2019 – showing the site (marked with a red dot) in context with surrounding area and MMA existing site to the south

- 2.3 A plan showing the existing MMA site boundary (edged red) is included at Appendix A.

Existing MMA Site and surrounds Description

- 2.4 The existing MMA site (see Appendix A, Plan 1, land owned by MMA) is predominately flat with a gradual slope south. The site includes areas of hard standing for the storage of vehicles, two valet buildings to the lower yard and the substantial auction house / offices and catering facilities to the upper yard. A steep high bank is located to the east of the auction house rising to the elevated residential area of Wern Street, Brynwynn Street and Beacon View to the east.
- 2.5 To the north of the site lies amenity land and residential development known as the Hafod (within which the site subject to this proposal lies adjacent). To the east lies dense terraced housing (note this is located at a higher level, well above the MMA auction house that is sited at the bottom of a sheer bank.) The south of the MMA site is bounded by a Public Right of Way (PRoW) that provides a link between housing of the Wern Street area to Victoria Street and vice versa. To the west lies mixed housing development from detached to flush fronted terraced properties together with a number of retail/commercial premises located in the local centre of Pant Road.
- 2.6 Relevant photographs of the site are contained in Appendix B.



Image 2 – The proposed site marked with a white pin – in the context of the surrounding area and the existing MMA site and A465 to the south

Proposed Site current description and context

- 2.7 The site (see the proposed site and land for associated works edged red in Plan 2, Appendix A) is currently owned by MTCBC and has been maintained on a goodwill basis by MMA for a number of years.
- 2.8 The site subject to this proposal forms a parcel of land approximately 0.1 hectares in size. The land is part of the grassed area located close to nearby housing of the Hafod. It is understood the land forms part of the MTCBC Asset No L0080 (Land adjacent to the Hafod Housing Estate) that extends to almost 2.5 hectares in total. A number of utility covers are contained within or partially within the proposed site (see Appendix B for photographs).
- 2.9 To the north of the site lies a strip of grassed land and a tarmacadam footpath linking the Hafod residential properties to Pant Road to the west, further north lies open land. To the east of the site lies an area of open grass land with tarmacadam footpath forming the link between the wider open land and the backs of the terraced properties of the Hafod. To the south lies the mature fir hedge marking the existing MMA northern boundary and current car parking and delivery area. Further south lies the steep embankment to the A465 at high level. To the west lies low bow top steel fencing that delineates the open area from the highway (Pant Road).
- 2.10 The site has a slight incline from the west where the site is lowest and rises to the east. This can be viewed in images 4 and 5 overleaf. In addition, please see Appendix A Plan 6, for proposed Section A to A.
- 2.11 See Appendix A Plan 2 for red line plan of the proposed site and offsite works and the part of the existing MMA site visible edged in blue.
- 2.12 Note that the operational area of the proposed car park forms a quadrilateral area (see Image 2 overleaf) however works outside of the site, to include some of the SAB works, connection for the attenuation tank proposed beneath the site and also planting of 2 stretches of native hedging and planting of 6 specimen trees form other minor areas outside of the main car park area that have been included in the red line to cover these works (either short term to lay pipework, or for the provision of permanent hedgerows and trees).



Image 3 – From Google Maps 2021 - The proposed site to be used for customer and staff parking , edged red – for identification purposes only



Image 4– Photograph of the site (looking SE) with the A465 running at high level in the background



Image 5 – Looking North along Pant Road with the grassed site to the east. Gable end of Hafod terraced houses just visible.

3. DESCRIPTION OF THE CURRENT MMA OPERATION:

- 3.1 The entire MMA site currently extends to approximately 3.2 hectares (8 acres) of land and buildings used for the purposes of motor auction sales. See Appendix A, Plan 1 for the red line outlining MMAs current site ownership.
- 3.2 MMA is the largest fleet only auction in the UK and has been successfully trading for in excess of 40 years. Areas for the storage of vehicles (including cars, vans, trucks, coaches, plant and machinery) are located across the site together with two valet buildings (lower yard), auction house, waiting / viewing areas, café, toilets and offices (all located within the concentration of buildings on the upper yard). Customer car parking is also provided upon entrance to the site at the northern car park.
- 3.3 Low loaders currently deliver vehicles for auction to the main car park in the north and have the ability to offload and exit the site under the watch of banksmen. Investigative work has taken place to test the site feasibility for access and egress of low loader vehicles off Pant Road using the access in to the main yard. The options for the turning of low loaders within the upper yard have been investigated yet are considered unviable as a permanent operating arrangement due to the loss of significant parking storage areas in this location.
- 3.4 The upper yard is essentially the auction's main forecourt / viewing area where vehicles are brought to be viewed by prospective buyers and must therefore be retained for this purpose in the long term rather than accommodating extensive manoeuvring areas.
- 3.5 The regular weekly motor auctions (outside of Covid restrictions) run in the upper yard on Monday and Wednesday evenings at 7pm and on a Saturday at 2pm. The upper yard is where auction vehicles are brought from their storage around the wider site to be viewed by prospective buyers. Once the auction is underway the vehicles are driven through the auction house at the relevant time for auction (see Appendix B, photograph 10).
- 3.6 Normally viewings for weekday auctions commence at 4pm and viewings for Saturdays at 11am.

- 3.7 Auction proceedings are normally completed within a 2.5 hour time frame from the commencement of the auction. MMA staff complete administration tasks and final movements of vehicles (main yard and car park) within 1.5 hours of the auction close and secure the site for the evening.
- 3.8 The main site, including the upper yard and car park to the north, is unrestricted in terms of hours of use yet the lower yard site to the south, that is primarily used to store commercial vehicles (Site H), is covered by the following restrictive condition provided by the Inspector in appeal decision APP6410/C/95/508749 on 21st February 1997:
- 'no activity shall take place on the site before 08.00 hours or after 18.30 hours on weekdays and Saturdays, nor at any time on Sundays or Public Holidays (the sole exception to this condition being in the event of a transporter arriving whilst the auction activities are being undertaken in the upper yard, such transporter shall be permitted to enter the lower yard for the purposes of parking only).*
- 3.9 Floodlighting to the lower yard is also restricted to the above hours however an application to operate the lighting 24/7 for security purposes has been submitted to MTCBC and has been conditionally approved. The application is now subject to Pre-action protocol in advance of potential Judicial Review. The application reference for this application is P/20/0262.
- 3.10 Due to the complexities of the site history, out of completeness a summary list of planning history for the MMA site is provided at Appendix C.

4. WIDENING OF A465 AND IMPLICATIONS (CPO) FOR MMA

Introduction

4.1 The loss of land to the road scheme means the business cannot continue in its present form. Without the provision of agreed replacement land the business will be greatly compromised by the land available to effectively run their business. Trading under these land restrictions would be challenging to the point MMA may be unable to continue.

4.2 This proposal forms part of a wider package of measures that prepares the business for the time when WG has taken land from the current MMA site to deliver the A465 scheme. Negotiations are ongoing with WG in terms of replacement land.

Background

4.3 MMA have considered how they can maintain continuity of operation when their land is taken. This has included discussions with WG since 2016 on various options in connection with the scheme including relocation of the auction hall complex and severance of the northern part of the site from the main yard. See Appendix A, Plan 3 showing the scale of the WG A465 works at Pant Industrial Estate.

4.4 During 2018 the A465 Heads of the Valleys CPO Inquiry considered objections from MMA relating to severance of their site and how blocking access under the widened carriageway would render the existing operation unviable. MMA sought provision of land to the north (Site C). Engineering design has consequently been updated to include a culvert to prevent permanent severance of the MMA site from its main access. The culvert is necessary to prevent severance. The culvert alone is, however, not enough to provide adequate replacement for land lost in this location and support continuation of the present operation on site.

4.5 The most up to date details of the scheme and how it will directly affect the MMA operation are summarised below:

- The main office, auction hall and toilet block are to be retained.
- Vertical walls to support the road are to be constructed.

- An 8.6m wide culvert will be constructed to run from the car park in the north, under the A465, and in to the upper yard securing good permanent road access to a unified site. The easement required is presently under final negotiation.
- The scheme will involve the permanent loss of around half the existing main parking area to the north of the site.
- The scheme will require use of all of MMA's customer car park and low loader turning area during construction (currently taking place).
- A significant part of the vehicle display and storage area will be permanently lost.

4.6 MMA have made clear to WG over the last 5 years, the nature of their business and the effects of loss of operational space and the limited ability to predict the levels of loss of sales. In considering the above MMA remain firmly committed to their successful business. Scaling down in order to function on a reduced site area is not a credible option.

4.7 MMA have deliberated how they deal with effects of the scheme to provide the business with the best chance of weathering these changes in to the future. These considerations include:

- Make any changes to operations on the ground;
- Find an alternative site in its entirety; or
- Seek replacement land fragmented away from the existing operation; or
- Seek replacement land adjacent to their existing business to allow the current site to remain fully operational minus land required by WG for the scheme).

4.8 Discussions have been ongoing for a number of years in connection with the scheme and those considerations listed above. MMA have undertaken an extensive assessment of their current site in both area of land (only small areas were identified as underutilised) and working practices together with the following investigations (listed below as 'A' and 'B') in arriving at the replacement land option of this 'site C' plus potential Site D.

Investigation A - Alternative location site search

4.9 Relocation has been actively considered for some 5 years. MMA carried out a site search for alternative locations in the locality and further afield to investigate a complete relocation of the business to another site. MMA sought a single consolidated site with good road access, free from operating constraints with reasonable travel distance for existing employees. Also,

an essential requirement is the need for continuity, therefore any available site would need to be ready prior to the existing site ceasing normal operation.

4.10 Sites more distant from the current operation were discounted due to being inaccessible to the current significant (38 staff) and loyal workforce of the business.

4.11 A range of local sites were assessed by Herbert R Thomas via desktop means and site visit. Many of these sites were discounted on the grounds of accessibility and limited area. See Table 1 (below) for the list of sites that were considered.

Site	Investigations	Consideration	Conclusion
Land off the A48, near Chepstow	Desktop exercise and site inspection	Unsuitable	Rejected
Land at Llantrisant Business Park	Desktop exercise and site inspection	Unsuitable	Rejected
Land at Nant Eirin, Tonyrefail	Desktop exercise and site inspection	Unsuitable	Rejected
Land at Rassau Ebbw vale	Desktop exercise and site inspection	Unsuitable	Rejected
Land at Pontypool	Desktop exercise and site inspection	Unsuitable	Rejected
Site at Goat Mill Road (flood issues)	Desktop exercise and site inspection	Unsuitable	Rejected
Site at A470 – Abercanaid	Desktop exercise and site inspection	Unsuitable	Rejected
Site at west of A470 south of Trago Mills, Upper colliers Row	Desktop exercise and site inspection	Unsuitable	Rejected
Site east of A470 near junction with A4102 near B & Q	Desktop exercise and site inspection	Unsuitable	Rejected
Former Ifor Works (GKN)	Desktop exercise and site inspection	Unsuitable	Rejected
Site at Rhydycar (part of Cwm Glo)	Desktop exercise, meeting with owner and site meeting. Contact with NRW	Potential yet SSSI ruled out development	Rejected

Table 1 – Alternative site search summary for entire relocation of MMA

4.12 The final site, Cwm Glo, opposite the Orbit Centre was assessed on site. Further investigations were carried out with NRW revealing the site was an SSSI with no question of planning

permission being granted as it was such an important and varied site. This one potential site was therefore also discounted.

- 4.13 The alternative sites were all deemed unsuitable and consequently sites adjacent to the MMA existing operation were considered. Initial consideration of the Former Ifor Works (GKN) as a relocation site was not supported due to serious concerns over contamination. Note land at the former Ifor Works is now still being actively considered for storage purposes, however the location of this land divorced from the main site by a public right of way and some 200m or more away from the main auction hall is far from ideal and would not be an adequate replacement by itself.

Investigation B - Adjacent Replacement Land

- 4.14 Over an extended period various ‘replacement’ sites adjacent to the business have been discussed to attempt to mitigate the effect of land lost to the scheme.
- 4.15 As explained at the CPO Inquiry any replacement site/s must facilitate continuity of operation throughout in order for the business to continue trading and safeguard turnover and throughput levels. Note that ‘Site E’ at the former children’s playground is provided by WG for MMA use on a temporary basis (now completed) whilst works to the A465 are being carried out. Once the works are complete however, MMA will require land to make up for the shortfall when this area is restored as a children’s playground and MMA are responsible for pursuing planning on these potential replacement sites.
- 4.16 The road scheme undoubtedly will limit the available land of the existing MMA site. It has already been stated that the land at the north of the existing site and the upper yard, where customers are first received, is MMA’s ‘forecourt/shop window’ surrounding the auction hall, the widest part of the site that facilitates movements and viewings.
- 4.17 Options of replacement land have been discussed at length. The CPO Inquiry focused on the provision of replacement land to the north of MMAs existing operation, the site subject of this proposal (Site C / Hafod), as a precondition to confirmation of the CPO given its importance to the business. This land will provide the business with a proportion of the area it requires to maintain trading and safeguard turnover and throughput to the levels of pre-scheme. This site C has no operational use to MMA until such time as the road is completely constructed, Future Valleys have handed back the remaining land at the existing car park (to be used as a construction compound for the duration of the works) and the culvert is fully open for MMA use.

4.18 Considering the above, land therefore will be required on further adjacent sites, notably site Sites C and D. For the avoidance of doubt the different uses of each area is summarised below.

- **Site C / Hafod** (subject of this application and further details provided in Section 5 and 6) – Provision of permanent replacement land for use as customer car parking, staff parking and the flexible use of the area for customer vehicle collection (domestic sized). No large scale low loader or transporters will enter this area and it will be segregated from the existing car park and delivery area by the existing fir hedge. The site will be available only after construction of the road is complete.
- **Site D / Former Ifor Works** – replacement land in order to provide sufficient area and capacity for vehicle storage purposes (such as refuse collection vehicles (RCV) and heavy goods vehicles (HGV) that are displaced from the existing car park by the road scheme, noting at times of maximum capacity circa 24 HGV/RCV are stored in the existing MMA car park). Site D land is in split ownership between the Welsh Government and a small section at the northern tip owned by MTCBC. The land is proposed as a replacement site option to provide storage for refuse or other large specialist vehicles. Access to the site is proposed via the MMA site to the north via the lower yard. No other access is proposed. In order to facilitate the access from the north, the PRoW separating the 2 areas will require stopping up under Order 257 of the Town and Country Planning Act 1990; and rerouting to the south. This cannot be actioned prior to resolution to grant permission being received from the Council. The proposals for this site continue to be considered by MMA and WG.
- **Site E Children's Play area Pant Road** – Temporary use whilst the full works of the scheme are being carried out sterilising the MMA car parking, turning area and some storage/display. (This area has been delivered and at the time of with occupation having taken place during July 2021).

Justification of proposed land in the context of land lost to the scheme

4.19 MMA currently operate on land in their ownership shown by the red line of Appendix A, Plan 1. A Notice to Treat (NTT) has been served by WG, details of which are referred to in this statement. An extract of the NTT Plan and Schedule are shown on Plan 4, Appendix A. The summary land take is shown below:

- Essential Licence of 2405 sq. m (of which 251sq m is Easement)
- Title Land of 3546 sq. m

- 4.20 Loss of land equates to loss of space for required circulation, parking, storage or display. This has an increase on operating costs and less efficient sales area resulting in MMA needing to sell more vehicles through auction to catch up to where they were pre-scheme. Whilst precise numbers are impossible to predict due to variations in level of stock and vehicle size we can confidently say the numbers will be significant. We conclude that due to the location of the land to be lost to the scheme, this is the most operationally valuable land to the business – prime forecourt/display land due to the configuration and proximity to the auction hall.
- 4.21 As a result of the loss of land MMA need to make way for more vehicles to be displayed on the main site to run through the auction to compensate for increased operating costs and a less efficient sales area due to the scheme. This means the removal of any staff parking (currently under the A465) to elsewhere in order to use the prime land adjacent to the auction hall for the purposes of Auction.
- 4.22 It also must be remembered that equivalence of area may not mean equivalence of operation depending on the location of the land and the usefulness of it to the business. Lengthily discussions have taken place with WG on this issue together with negotiations on replacement land areas. More recently this has focused on site D concerning the HGV storage provision. These discussions are yet to reach a conclusion whilst more pressing matters in connection with the scheme in general and temporary access to the main yard are finalised.
- 4.23 Initial Ground Investigation works and Ecology surveys were carried out in 2019, further work to progress planning on these sites is awaiting the confirmation and agreement of the replacement land the WG are prepared to make available to MMA for their losses.
- 4.24 The most recent discussions focused on the operational land and the area required to rehouse those vehicles displaced by the A465 scheme (some 40 RCV / HGV over 2,359 sq. m). This figure has been broadly accepted by MMA as the area required for storage of vehicles displaced by the scheme. There is also an understanding that the basis of the calculation of this replacement land cannot be on an 'area taken' equals 'area replaced' basis due to a number of factors that define the operational utility - the replacement land location, configuration and capacity for manoeuvring RCVs all needs to be taken in to account and combine to provide the larger area of land (2,359 sq. m) than the scheme physically takes on the ground.
- 4.25 HGV and RCV are very important elements to the MMA business however, the replacement land also needs to deliver areas for smaller, domestic (commercial) vehicles, and critical

customer parking, staff parking, provision for disabled bays and a point to charge increasingly common electric Vehicles (EVs). All these types of domestic vehicles are most suited to Site C. By concentrating the staff and customer parking in this location it frees up other areas for alternative uses as follows:

- Area within the existing car park to be allocated for non-runners that cannot easily be moved great distances and their ideal place is close to the low loader drop off area in the existing car park.
- Area within existing car park to be allocated for plant that is heavy and difficult to transport a long way from the delivery location.
- Area close to the auction hall that will provide the area required to increase the number of vehicles through the sale and therefore have the ability to increase sales.

4.26 Furthermore site C is well placed, on the periphery of the MMA site, to deal with the collection of sold (non heavy) vehicles with the car park large enough for purchasers to safely walk around their vehicle and check it prior to driving away (See Appendix A Plan 6 for the location of the spaces on the western edge of the car park). This would sometimes be carried out in rainy conditions under the A465 however the culvert would not allow such operations to be carried out within it as it must remain clear. The site C has road frontage to Pant Road and whilst screened by hedging and fencing will form a visible link for the business with the street scene (a continuation of the existing).

4.27 Note deliveries by low loader of heavy vehicles, non -runners and plant will always be dealt with on the existing car park rather than the proposed section. Therefore, it follows that customer and staff parking is segregated from this area that is often busy with manoeuvring of vehicles, sometimes 2 low loaders at a time, JCB lifting plant from low loaders and manoeuvring of RCV or HGV that need a significant amount of space to exit from the low loader safely.

‘Triangle expansion land Site’

4.28 Importantly another area being lost to the scheme and shown on the (extract) CPO NTT plan (Appendix A, Plan 4) as parcel 11/5g is the ‘triangle’ parcel of land that MMA purchased in 2013. This was purchased for the purposes of future resilience of the business and was ear marked for future expansion. The site was not accessed or surfaced as the threat of the road scheme became apparent very shortly after the purchase. The area of land in parcel 11/5g is 523 sq. m. This land must be replaced and the most similar location to the existing triangle land is land at site C fronting Pant Road.

- 4.29 The area under the A465 over-sail that is currently regularly used for the collection of vehicles by a purchaser is going to be lost. It will be lost to the culvert that is required to be kept clear for safety and security purposes. This land, it is acknowledged, is dual purpose as it is used for vehicle collection but also the thoroughfare from the main car park to the main yard. The area of the proposed site to the north of the existing car park is just below 1,000sq m that will serve to compensate for this area plus that of the triangle site and adequate circulation area.
- 4.30 Whilst MMA will continue to separately pursue their claim for compensation for the land lost where mitigation of those losses is not reasonably available, the prime objective of this planning application is to create certainty for the business going forward that land at site C will be available for the staff and customers and parking of domestic scale vehicles in order to free up other areas of land within the site to be used more intensively for auction purposes or larger vehicles.
- 4.31 The flexibility and certainty described above will protect the resilience of the business going forward with at least a portion of the land to be lost secured with the remainder to be secured at Site D for larger heavy vehicle storage.

5.0 BACKGROUND TO APPLICATION SUBMISSION TO MTCBC

Pre-application Submission

- 5.1 An initial very basic pre application was submitted to MTCBC in July 2019 with feedback received in September 2019. The feedback confirmed that any application would need to be supported by a range of plans/ documents and assessments including Noise, SAB, Ecology, Environmental Lighting Impact Assessment and overall justification including annotated plans demonstrating the uses of the site and opening hours.
- 5.2 Furthermore, MTCBC require the justification of the development of this site to be able to fully assess the proposal against the following criteria, note these criteria form the heading of the review section within this statement (section 7):
- Visual impact
 - Impact on the amenities of the surrounding residents
 - Ecological impacts
 - Surface water drainage
- 5.3 The above MTCBC feedback further informed the site assessment, investigations, survey work and design that has been carried out alongside wider discussions relating to the direct impacts of the CPO on the future resilience of the MMA business. Following this work a detailed pre application was submitted in July 2021 including ecology, noise, lighting surveys, landscape visual assessment and a range of plans demonstrating the design and use of the proposed site. The survey work forms part of the justification of the proposal in response to the visual, amenity, ecological and drainage impacts of the scheme. MTCBC responded to the detailed pre application in August 2021 concluding that further information was required in terms of ecology and also further details on levels - these items are considered to now be addressed as part of this full planning application together with further information of the type of acoustic barrier envisaged. Please note light spill to the western edge of the proposal is discussed further in section 6 of this statement.
- 5.4 In conclusion to the July 2021 detailed pre-application Officers stated that the need for the proposed parking area is appreciated and subject to further details being submitted and being assessed then the development could be 'constructed and utilised without causing significant adverse impacts to highway safety, residential or visual amenity'.
- 5.5 The CPO process and the discussions and negotiations on related issues remain ongoing. This process provides the context for the application.

- 5.6 This planning application provides a range of supporting information including ecology, noise, security, boundary treatments, surface materials and indicative layout. This Planning Supporting Statement should therefore should be read in full and together with the appendices, application form, plans and supporting documents/reports.

6. PROPOSAL FOR SITE C:

Introduction

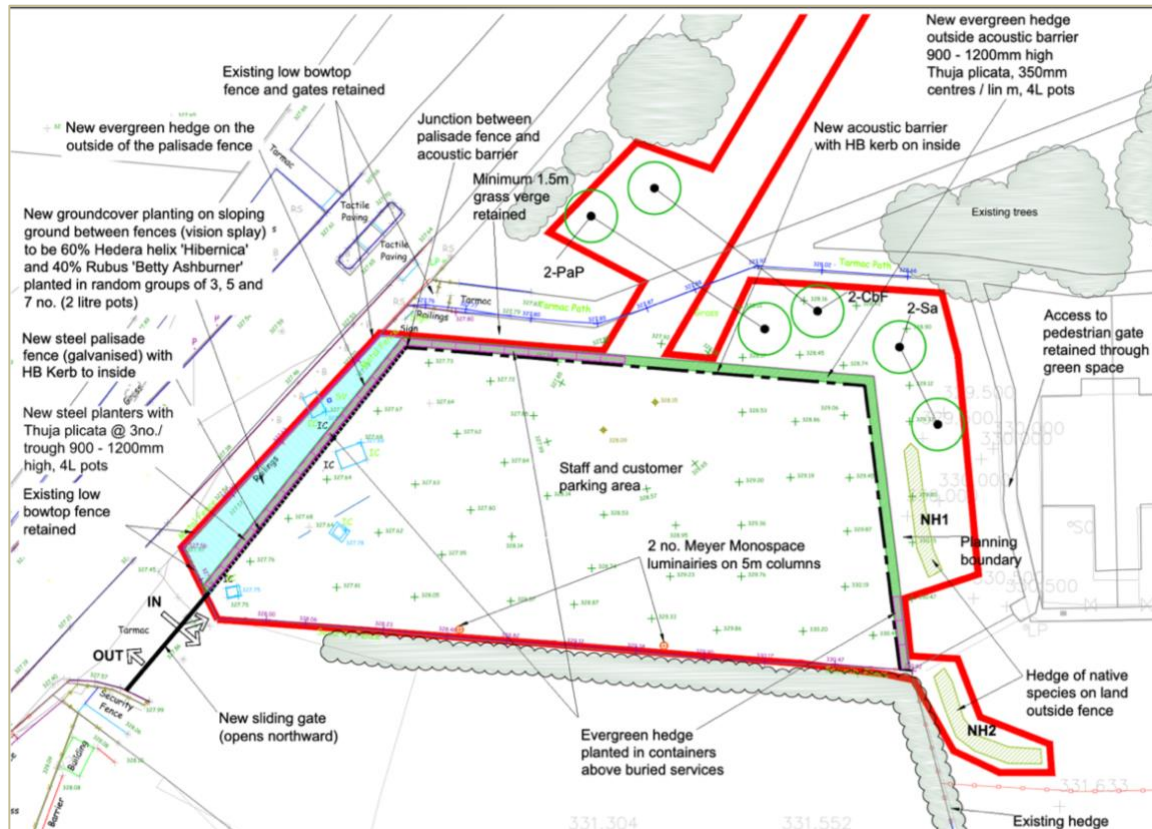
- 6.1 The widening of the A465 will result in MMA losing an integral part of their site to the road scheme. An extensive alternative site search has been carried out however has proved unsuccessful (see Section 4). The development of this adjacent site is therefore necessary in order for the business to continue to operate from this established location and employing around 40 staff.
- 6.2 Providing MMA with replacement land of an area limited to that of non-peak activity and under capacity would clearly be inappropriate and would not safeguard turnover and throughput levels going forward. Therefore, all provisions that have been made have been done so on the full capacity scenario.
- 6.3 An initial larger area of 1,325 sq. m was considered for site C. Due to the various investigations that have taken place including analysis of and relationship to the existing area and dwellings, Ecology survey, Utility Survey, and trial hole investigations the area site C has been reduced in size to accommodate an operational area of just under 1,000 sq. m. This reduction is seen as appropriate in order for the site to integrate in to the existing environment whilst still providing much needed area for the business.

Proposal

- 6.4 The proposal seeks a ***car parking area for the use of Merthyr Motor Auction, customers and staff, including boundary treatments, hard and soft landscaping at The Hafod, Dowlais***. See below for proposed general arrangement Plan (extract) prepared by Haire Landscaping Consultants – full plan available in Appendix A, Plan 5.

The proposed area will be used for the following:

- Car parking for staff
- Car parking for customers
- Disabled spaces for customers and or staff
- Area for the dispatch/ collection of sold domestic sized vehicles.
- Electric vehicle charging point
- Adequate turning and manoeuvring room for domestic sized vehicles.



General arrangement plan extract (Mike Haire Landscape Architects : HLA)

6.5 The above proposal will form an extension to the existing established MMA car park, the remaining land of the existing MMA car park will be devoted to delivery and storage of larger vehicles. The location of these uses has been adjusted due to the land taken for the A465 scheme and the loss of land equates to a reduced parking area being available in this location. Provision in the existing car park post A465 works:

- Parking/Storage for HGV and other 'heavy' vehicles / non runners
- Collection of HGV/non runners
- Delivery area as per existing arrangements for all vehicles and plant.

Design

6.6 The overall design has been developed to respect the surrounding area of the Hafod and present both a practical solution for the business that will also provide changes to the street scene, through a mix of hard and soft landscaping , and also benefit to the community using the Hafod area through enhanced safety and security measures and additional native planting to promote biodiversity.

- 6.7 The proposed parking area forms an extension to the remaining car park area that MMA will retain after the A465 works are carried out. The proposed parking area is fenced for security and screened for visual amenity and also, as a precautionary measure, against noise disturbance. The new development will be viewed against the backdrop of the widened A465 providing a retaining wall in place of a current grassed bank. Therefore, integral to the design has been the retention of existing fir hedging, (and outside of the MMA site) proposed planting of 6 specimen trees to the north and east and the addition of 2 sections of native hedge to the east – these will all soften the backdrop of the A465
- 6.8 A Visual Impact Appraisal by Haire Landscape Consultants is submitted as part of this planning application. The appraisal concluded that any 'slight adverse, visual impact will reduce to 'negligible' or 'slight' from all receptor locations by year 5 - i.e. once the planting has matured around the site.

Extent of site / Boundary location

- 6.9 The boundaries of the proposed site have been revised inward as far as possible providing MMA the sq. m required in this location to operate the business following the A465 works.
- 6.10 The building line of the Hafod houses is respected by the position of the northern boundary ensuring views out of these homes is not dominated by the scheme or shadowed by the proposed acoustic fence and softer hedging located to the west.
- 6.11 The existing Hafod pedestrian pathways have breathing space of at least 1.5m between them and the proposed MMA fence / evergreen hedge. In addition, the gate and palisade fence are set back from the edge of pavement along Pant Road in order to ensure the requisite vision splay and only ground cover planting is proposed in the vision splay zone.
- 6.12 The boundaries of the site have been drawn to ensure the Hafod grassed area remains as open as practicable and enhancements have been proposed within this area (outside of the MMA proposed car park operational area) of specimen trees and native hedging to the east. Unfortunately, a small number of trees (x5) within the proposed site will be lost however these are to be replaced (x6) on land outside the proposed operational area.
- 6.13 The proposed boundary to the east has been scaled back significantly to retain as far as possible the openness of the pedestrian pathway that runs north-south to the rear of the Hafod

properties. The desire line that has been identified across this open land can also still be utilised as the MMA car park proposal is drawn back from the edge of the site.

Boundary treatments

- 6.14 Existing steel palisade fencing and evergreen hedge within the MMA site running east / west will be retained in order to form the southern boundary of the proposed car park and to keep physical segregation between the domestic vehicles (customer and staff car parking) and the delivery zone and large/nonrunner vehicle storage area.
- 6.15 New Grade 1 galvanised palisade fencing (to match existing) is proposed to the western boundary together with planting (see Paragraph 6.17). MTCBC existing metal bowtop fencing (low level) along Pant Road (and gate) is to be retained along the entire stretch at edge of pavement. Between the bow top railing and palisade a mixed ground cover is proposed.
- 6.16 The northern and eastern boundaries will be treated with a noise attenuation barrier of specification provided by the acoustic and noise consultants (see accompanying report). Despite there being only a very slight increase in noise level it has been recommended a barrier is proposed to attenuate any slight increase in noise from the existing use as open grassed area to the use of car parking. The 2.1m barrier is of steel post and timber panel construction as seen in the image below. Discussions have taken place with 3 local suppliers and negotiations have been carried out to incorporate a visually attractive security measure to the top of the fence as shown below. See Appendix F for example specification.



Image 6 – Acoustic fence 2.1m high



Image 7 Security detail

Soft landscaping and planting

- 6.17 Haire Landscape Consultants propose the boundaries will be planted on the outer side of the fence with *Thuja plicata*, a fast growing evergreen conifer (refer to Appendix A, Plan 5). This will be planted in immoveable galvanised steel troughs (see image 8 and 9 below for details) on the western and westerly half of the northern boundary in order to protect the DCWW and other assets beneath. The troughs will be part inset in to the ground (approx. 10 cm). in order to adequately secure, soften and screen the site. Standard planting of the hedge will be carried out on the easterly section of the northern boundary and the eastern section. Please see submitted maintenance plan for the proposed scheme prepared by Haire Landscaping Consultants as part of the supporting documents to this planning application.



Image 8 Galvanised trough for planting



Image 9 Thuja Plicata

- 6.18 Ground cover planting is also proposed along the Pant Road (western) boundary between the existing bow top fence and the proposed palisade and planters. Proposed species of *Hedera Helix Hibernica* and *Rubus Betty Ashburner* in a 40% / 60% mix respectively (see images 10 and 11 below).



Image 10 Hedera Helix Hibernica



Image 11 Rubus Betty Ashburner

- 6.19 Specimen tree planting is proposed between the Hafod pedestrian footway and the MMA site (on the MTCBC Hafod land). New specimen trees (x6) 12-14cm girth (rootballed) are proposed in the following species:
- *Carpinus betulus* 'Fastigiata'
 - *Prunus avium* Plena

- Sorbus aucuparia.

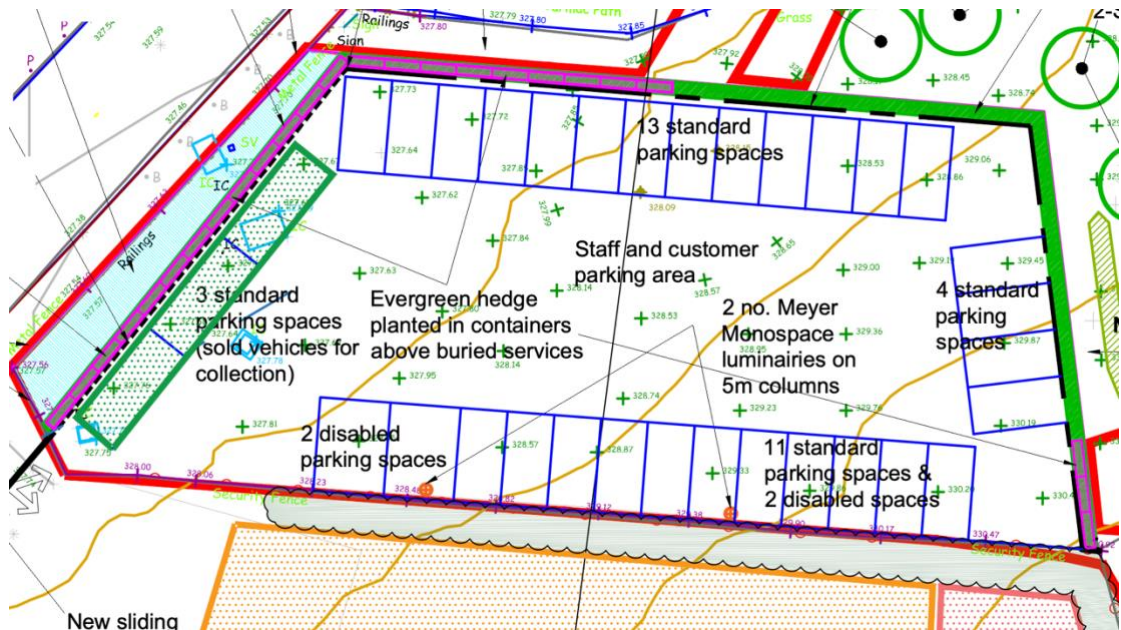
- 6.20 In order to increase the biodiversity of the area two sections (of approximately 10m in length each) of native hedgerow are also proposed for planting in front of evergreen hedgeline along the eastern boundary providing interest and diversity. Discussions with the Council will determine the ultimate native species to be agreed.

Hard landscaping / Surfacing

- 6.21 The retained part of the existing car park will remain as per the current surface material/s comprising a mix of gravel and hard surface. Note no specific works are proposed to the existing car park other than the removal of approximately 4m of fir hedge, palisade fencing and Armco barrier at the western end to allow an access in to the new section of the car park, and making good.
- 6.22 The SAB concept plan (refer to Appendix A, Plan 6) provides the details of the surfacing proposed. The new car park area will be of (majority) lined permeable paving surface, note this is a similar specification to the surfacing used on Site E on the western side of Pant Road. See attached specification contained in Appendix E. An attenuation tank is proposed with a proposed connection outside of the MMA site in to the existing DCWW surface manhole and to be agreed through S104 agreement.
- 6.23 Asphalt surfacing is required on approximately 25% of the site to protect DCWW assets beneath. Informal discussions have been carried out with DCWW to arrive at this solution. Further discussions would need to take place as the scheme progresses.
- 6.24 The engineers concluded that the surfacing outlined above was appropriate without any retaining structure given the levels involved. Please also refer to the levels plans that are submitted separately.

Parking / turning arrangement

- 6.25 Due to the permeable surfacing proposed on the majority of the car park and the flexible nature of spaces required it is not proposed to mark out the spaces within the car park. Note no spaces are marked on the existing car park other than disabled bays. However, for indicative purposes the plan below demonstrates a parking arrangement of 32 spaces that was considered at an earlier design stage.



Indicative Plan of the car parking arrangement within the proposed site. See Appendix A, Plan 6 for full detail.

6.26 In order to allow for a flexible area the proposed section of the car park subject to the application proposes the following 33 spaces :

- Car parking for staff / customers to include:
 - 27 x standard car parking spaces
 - 2 x dedicated disabled spaces
 - 1 x EV charging space (exact location TBC along the southern boundary of the proposed car park).
- Provision of adequate space in the car parking area for the collection of sold vehicles, allowing space for customers to walk round the vehicle to check their purchase prior to driving away. 3 x spaces are provided for this purpose.

MMA Vehicular access sliding gate

6.27 The steel gate is proposed at 11m width, to be situated set in from the edge of pavement to allow a vehicle to pull in at least off the road in order to unlock the gates on a morning. The setting in of the gate will also allow satisfactory visibility when exiting the site.

6.28 It is proposed the gate will be constructed from galvanised steel to compliment the grade 1 palisade fence to the front and match with the rest of the MMA main site. It is proposed the gate will be electrified to slide to the north in front of the proposed palisade fence line (behind the galvanised steel planters) of the new section of car park ; note the existing access gates are a pair of palisade topped steel gates that open outwards.

- 6.29 The proposed sliding gate has been designed in order that it will not obstruct the pavement in either the open or closed position. Note low loaders and transporters will enter via this main gate however they will not manoeuvre in to the proposed site. All of their operations will take place as normal on the remaining land and there is sufficient space in which to continue the access and egress as they do currently.

Drainage / SAB

- 6.30 Originally a rain garden was considered along the western boundary however assets belonging to DCWW beneath the site prevent the provision of this solution at this particular location. The site will now benefit from a small section of proposed asphalt surfacing that will form the easement around the assets to the west of the site with the remainder formed from lined permeable paving. An attenuation tank will be placed under the site, broadly to the centre and toward the northern boundary of the site. Further details are to be found within the SAB pre-application that has also been submitted to MTCBC (the concept plan can be viewed in Appendix A, Plan 7). SAB Pre-app has been completed and the full SAB submission is being drafted for submission.

Security and lighting

- 6.31 In order to provide a safe and secure site the proposed elements are combined:
- Palisade fencing to western boundary
 - 2.1m high timber anti climb acoustic barrier with bespoke security provision to the top to the north and east boundary
 - Additional CCTV camera (x4 bullet style units) to be provided using the 2 proposed lighting columns (2 cameras per column)
 - Security lighting with 'down light' to light and protect the vehicles without creating significant light spill beyond the site edge
 - Lighting to be operational in hours of darkness for security purposes
- 6.32 The proposed security cameras will be Dahau model number DHIPCHFW524IT or similar (see below for image of a similar camera). These are bullet style cameras complete with IR to 40m and have built in line crossing alarm technology as required. These will be fitted approximately half way up (circa 2.5m) the lighting column.



Image 12 – Bullet style security camera

- 6.33 Qoda Light have carefully considered the lighting proposals and are proposing Meyer monospace lighting (to match those proposed at the lower yard) minimising light spill upward and to the surrounding residential windows of homes to the north and east. The solid timber acoustic barrier also lends itself to further prevent light spill at lower levels. The lighting scheme is presented in a separate report that demonstrates a 0.2 or lower lux level at the Northern and Eastern boundaries with the open land.
- 6.34 Note comments from the MTCBC Ecologist from the pre application raised concern over the ‘dark’ corridors being required around the entire site. The plans on Page 6 and 7 of the Qoda report demonstrates the 0.2 lux or below on the horizontal plane and below 0.4 lux on the vertical plane is achieved immediately outside of the eastern and northern boundaries (red line) due to the specific lighting used and the solid 2.1m high timber acoustic barrier. The Qoda report confirms a small amount of light spill to the western boundary where it meets Pant Road footway. Note there are two street lights in this location, one on the eastern side of the carriageway adjacent to the site and one further south on the west side of the carriageway. A localised spill is evident within the existing MMA site – this car park is lit for safety and security reasons. For these reasons and the fact that the main road needs to be lit for safety and security reasons we would argue that the provision as shown is a satisfactory balance.
- 6.35 Note baffles are not included on the proposed luminaires as their lighting distribution is very directional and focuses the light on to the task area.



Image 13 Meyer monospace Lighting column



Image 14 Meyer Monospace Luminaire

- 6.36 The sharing of existing columns for CCTV has been proposed in order to minimise visual clutter of the area. Western security is advising on the scope of the CCTV and whether this may assist beyond the MMA site/proposed site, in part by covering the Hafod grassed area thereby increasing the safety and security of pedestrians using this area, particularly at night.

Vehicular and pedestrian access

- 6.37 No new access is proposed from Pant Road to access the site as the land will be accessed via the existing entrance to the MMA site. Vehicles will enter the main MMA gateway and be directed to the left for customer / visitor/ staff parking. Once parked the pedestrian would walk back through the way they drove in and walk south in to the main MMA site.

Hours of operation

- 6.38 The MMA current car park does not have any restrictions in terms of hours of operation and this enables the business to take delivery of vehicles during the hours the staff are on site. On an auction day this could be up to around 10pm.
- 6.39 It is appreciated that as this is a new area of car parking, there may be a desire to restrict operation. MMA would ideally like an unrestricted site, as per their existing car park. Normally the MMA site is staffed from 8am until approximately 10pm at night and as the proposed area will be for staff and customer car parking it needs to accommodate those staff arriving early and leaving after auction. Hours of 8am to 10pm Monday to Saturday are therefore proposed as a minimum and considered reasonable in this context.

Sustainability

- 6.40 MMA are committed to their local business, value their loyal, local staff and provide a significant employment contribution to the local area. MMA wish to provide the best experience for customers. In view of the rising numbers of electric cars an electric charging point will be located for use by both staff and customers. The exact location of the point is to be determined however it is anticipated this will fall on the southern boundary of the proposed extended car park area.
- 6.41 Where practical native species are proposed in the planting scheme and will be fully outlined in the Landscaping and maintenance plan by Haire Landscape Consultants. .
- 6.42 Local contractors and trades people have already been approached to both supply, fit and deliver as much of the scheme as possible in order to reduce carbon footprint.

Summary

- 6.41 In summary the importance of delivering this site is underwritten by the decision of the Welsh Ministers to confirm the A465 CPO and Road Orders subject to a modification that will provide a two way vehicle culvert under the new carriageway, within the MMA site, mitigating the effects of loss of site area to the North to the scheme. Full advantage of that culvert relies upon land availability to the North (site C) to mitigate for land that is still being lost to the scheme and the widened carriageway.

7.0. PLANNING POLICY:

7.1 This section summarises the local and national planning policy of relevance to the proposals and the documents that will be used to support the forthcoming planning application.

National Planning Policy

7.2 National policy is contained within the National Development Framework (NDF), a new 20 year national spatial strategy. It sets out the Welsh Government's policies on development and land use in a spatial context and will be known as 'Future Wales: the national plan 2040'. ... The NDF is required under the Planning (Wales) Act 2015 and must be reviewed at least every five years. The NDF is complemented by Planning Policy Wales (PPW), Edition 11 of February 2021 and Technical Advice notes (TAN). PPW states at paragraph 5.4. regarding Economic Development:

5.4.1 For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.

7.3 The range of Technical Advice notes (TAN) will also be assessed in the planning applications to follow, with particular reference to:

- TAN 5: Nature conservation and planning
- TAN 11 : Noise
- TAN 12: Design
- TAN 23 : Economic Development

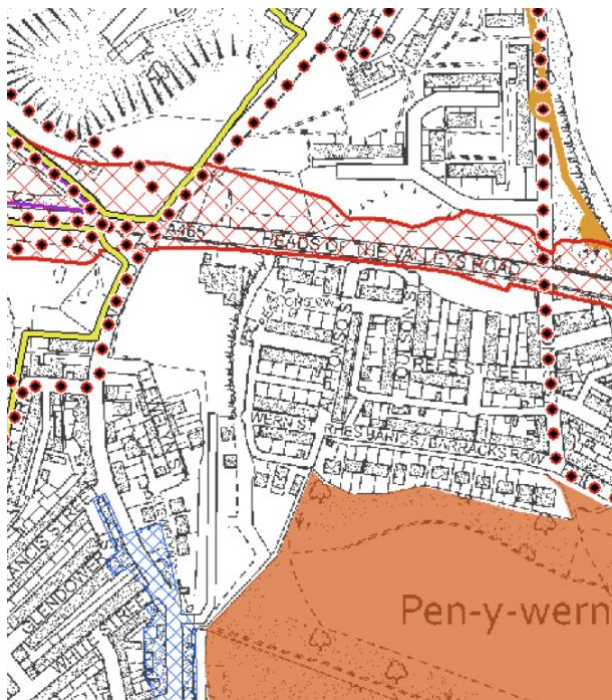
7.4 TAN 23 states at paragraph 2.1.1:

'It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively and imaginatively seek such 'win-win' outcomes, where development contributes to all dimensions of sustainability.'

Local Planning Policy

7.5

The adopted First Replacement Local Development Plan (LDP) for MTCBC sets out how the County Borough will be developed over 15 years to 2031. The plan was adopted in January 2020 and supersedes the previous adopted LDP and forms the basis for land use planning decisions across the county borough.



MTCBC First Replacement LDP Proposals Map (extract)



MTCBC First Replacement LDP Constraints Plan (Extract)

- 7.6 The site sits within the Primary Growth Area comprising the northern sector communities, including Pant and Dowlais. The site within the settlement boundary as outlined by the LDP. It is therefore considered the principle of development is acceptable subject to meeting the range of specific LDP policies.
- 7.7 The proposed site is not allocated in the replacement LDP.
- 7.8 Wide ranging planning policies will be considered in the forthcoming planning application to include (see Appendix D for full policy wording):
- SW4 – Settlement boundaries
 - SW11 – Sustainable Design and Placemaking
 - EnW1 – Nature conservation and ecosystem resilience
 - EnW2 -Internationally and Nationally protected sites and species
 - EnW3 –Priority Habitats and Species
 - EnW4 – Environmental Protection
 - EcW2 – Protecting employment sites
- 7.9 In general policy terms the LDP sets a number of key messages for the county borough. Significantly it states a projected population decline from 2024 with people of working age leaving for other areas of the UK. MMA are keen to continue to offer employment opportunities for those that choose to stay.
- 7.10 The LDP states access to sufficient quality open space varies but is generally poor across the County Borough. In the immediate area the access to open space is considered very good due to the open green area of the Hafod infiltrating through the area. The use of this proposed 1,000 sq. m site for MMA requirements equates to 4% of the total 25,000 sq. m grassed area of the Hafod.
- 7.11 Supplementary Planning Guidance should also be considered. The following documents are considered relevant:
- SPG Note 4 – Sustainable Design (July 2013)
 - SPG Note 5 – nature and Development (May 2015)

8.0 REVIEW

Visual Impacts

8.1 The visual impact of the proposal and any effect on residential amenity are important considerations. The provisions of the Visual Impact Assessment (VIA) carried out by HLC form the basis of the impacts from a visual perspective. The VIA concludes (Section 6 of submitted VIA) as follows:

- *The visual effects of the proposal result both from the physical appearance of the development itself and from the reduction in the extent and visibility of the amenity space to the north.*
- *The proposed development is similar in appearance to the baseline arrangement and specimen trees will be planted in the grassed amenity area to replicate its character. It is acknowledged that the amenity area will be reduced in scale, but this perception could be mitigated if part of the existing roadside hedge (within the amenity area) was cut back.*
- *The assessment has concluded that the visual impact will be 'slight adverse' at worst at implementation, apart from on the short length of path that passes immediately adjacent to the site. These effects will reduce to 'negligible' or 'slight' from all receptor locations by year 5.*

8.2 The proposal aims to provide an attractive edge to this development in simple terms a soft edge to the development is proposed with timber fencing to the northern and eastern boundaries. This will form the edge of the Hafod grassed area with the A465 and retaining wall as the backdrop. The use of palisade is minimal and along the Pant Road (western boundary) only to match in with the existing.

8.3 It is understood from the August 2021 feedback from MTCBC officers that the Councils landscape Architect has raised no concerns subject to the following being submitted and this has been carried out as part of the application:

- Full plant specification details (attached details from HLC),
- Existing and proposed levels details (and relevant sections) – See Plan 6 Appendix A by HLC and attached separate plans,
- Details of ground preparation (attached summary note HLC / HRT Ltd)
- Details of aftercare and post implementation management (see attached Maintenance / Management plan by HLC).

Amenity Impacts

- 8.4 Firstly it is acknowledged by MMA that the Hafod area forms an open grassed setting for the residential properties. However, the use of this land for a long standing successful business that provides substantial local employment forms only 4% of the amenity area of the wider Hafod area of 2.5 hectares. To this end it is considered the remaining land can adequately deliver the openness required for this area.
- 8.5 The potential for noise generation associated with the proposal has been considered in detail by reputable noise consultants (see accompanying Noise Impact Assessment) that has determined the barrier should be erected as a precautionary measure to mitigate any slight increase in noise at the sensitive (residential) receptors in proximity to the site. It is also understood that the hours of operation need to be carefully considered in relation to residential amenity due to the residential properties nearby. It is noted as part of the pre application the Council Environmental Health Officer made no objection to the proposal.
- 8.6 The lighting scheme has been carefully designed by Qoda Light using a specific tilt on the Meyer Monospace Luminaire to ensure the car park is permanently well lit for security yet the light does not spill unacceptably beyond the boundary fences affecting the amenity of those properties closest to the site. The lux level therefore is 0.2 Lux (horizontal plane) and 0.4lux (vertical plane) or below along the northern and eastern boundaries for the purposes of residential amenity and ensuring dark corridors and no adverse impacts on any bat population (see below). Note the western boundary adjacent to the main road does not meet this requirement however due to the streetlighting and activity in this location this is considered to be acceptable.

Ecological Impacts

- 8.7 The ecological impact of the development has been carefully considered by the applicant and advice taken from BE Ecological. Whilst the 5 trees must be removed from the proposed site in order to create the open parking area, 6 specimen trees are to be replaced on land outside of the operational car park area. New planting will be implemented as part of the landscaping scheme including native hedge off site, and specimen trees, plus seeding of the existing grassed area immediately around the proposed car park to increase pollination. These measures will combine to deliver a benefit to the biodiversity of the area.

- 8.8 Overall and from the survey work completed the site appears to be of little importance to bats both in terms of roosting and foraging/commuting. During the transect surveys, only three species common pipistrelle, soprano pipistrelle and possibly myotis were identified on site and in low numbers only. The results of this survey are largely in line with the results of the survey undertaken of the valeting yard to the south of the application site. (Lower yard, BE Ecological Ltd, 2020).
- 8.8 It is anticipated that the permanent lighting at the site (during hours of darkness) will not have any adverse impact on foraging, commuting or roosting bats providing the mitigation stated in the various sections is implemented throughout the site. The lighting design has been considered with the potential for bats in mind.
- 8.9 Overall, it is concluded that the site is of a low ecological value at a local site level however the proposal aims to make a positive impact on the biodiversity of the area by the provision of mixed ground cover and semi mature planting.

Surface Water Drainage

- 8.10 The surface water drainage scheme is outlined in the SAB application currently being prepared for submission.
- 8.11 The Pre Application SAB has been submitted to MTCBC and comments received. The Plan 7 contained in Appendix A shows the SAB concepts put forward. These are also briefly discussed in the proposal section of this statement at paragraphs 6.25 and 6.30.

9.0 CONCLUSION

- 9.1 The development of the small area of grassed open space is required for the purposes of maintaining this successful and long standing local business and significant employer after the works of the A465 are completed. The 1,000 sq. m allows dedicated and safe provision for the customer and staff parking area together with a vehicle collection area. These uses are safely segregated from the main delivery and storage area of the existing car park.
- 9.2 The proposal goes some way in replacing land lost to the road scheme, specifically the site known as the 'triangle' site adjacent to Pant Road. The heavy vehicle storage is still planned to be held away from the Site C and discussions on site D for this large and heavy vehicle storage area on a portion of the former Ifor Works site are ongoing.
- 9.3 The site survey work has demonstrated some minor impacts that require mitigation and with these measures in place it is considered the development would be acceptable in impact terms and planning policy.
- 9.4 MMA are keen to open further dialogue with the council in regard to the off-site works as soon as possible.

APPENDICES A-F : See separate documents

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