

Date: 29th January 2025

Our Ref: LH/22.202

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Dear Marlene,

Town and County Planning Act 1990 (As Amended)

Planning submission

**Proposed construction of a new teaching block comprising Meithrin, Nursery and Community Room, an external covered walkway linking the new block to the existing school and associated works
Ysgol Gymraeg Rhyd Y Grug, Aberfan, Merthyr Tydfil CF48 4NT
PP -13733461**

Asbri Planning is appointed as planning agent to Atkins Realis and Merthyr Tydfil County Borough Council to submit a planning application in respect of a proposal to construct a new teaching block comprising Meithrin, Nursery and Community Room, an external covered walkway linking the new block to the existing school and associated works at Ysgol Gymraeg Rhyd Y Grug. The project includes internal adjustments to the existing school building to improve the spatial organisation to include a new Learning Resource Base and relocate the staff room, maintenance room and toilets. With the exception of changing a window into a door to provide an independent access point for the LRB, all works proposed to the existing block are all internal. All works to the existing block benefit from permitted development rights under Part 32 Class A. This planning application is therefore sought only for the new teaching block and external covered walkway linking the new block to the existing school.

Submission

The following plans are submitted to support this application;

Document/drawing (reference where applicable)	Prepared by
RYG-ATR-XX-XX-D-A-021001 P02 - Location Plan	Atkins Realis
RYG-ATR-XX-XX-D-A-021002 P02 - Existing Site Plan	Atkins Realis
RYG-ATR-XX-XX-D-A-021003 P02 - Proposed Site Plan	Atkins Realis
RYG-ATR-XX-XX-I-L-400001 P01 – Colour Plan	Atkins Realis
RYG-ATR-XX-XX-D-L-400001 P01 - Landscape GA	Atkins Realis
RYG-ATR-XX-XX-D-L-480001 P01- Existing Site and Tree Removal Plan	Atkins Realis
RYG-ATR-01-00-D-A-011001 P02 - Existing Building - Existing Plan	Atkins Realis
RYG-ATR-01-00-D-A-011002 P02 - Existing Building - Demolition Plan	Atkins Realis
RYG-ATR-01-00-D-A-011003 P02 - Existing Building - Proposed Plan	Atkins Realis

RYG-ATR-02-00-D-A-011001 P02 - New Build - General Arrangement Ground Floor Plan	Atkins Realis
RYG-ATR-02-00-D-A-011002 P02 - New Build - GIA Plan and SOA	Atkins Realis
RYG-ATR-02-00-D-A-151001 P02 - New Build - General Arrangement Roof Plan	Atkins Realis
RYG-ATR-02-00-D-A-284001 P02 - New Build - Link Walkway	Atkins Realis
RYG-ATR-02-XX-D-A-012001 P02 - New Build - General Arrangement Elevations	Atkins Realis
RYG-ATR-02-XX-D-A-012001 _ New Build - General Arrangement Elevations (not to scale, coloured drawing)	Atkins Realis
RYG-ATR-02-XX-D-A-013001 P02 - New Build - General Arrangement Sections	Atkins Realis

The following Reports are also submitted to support this planning application;

Report	Author
Preliminary Ecological Appraisal, November 2024	Acer Ecology
Bat Survey, September 2024	Alder Ecology
Tree Survey, February 2024	Andrew Taylor Arboriculturalist
Transport Statement, December 2024	Asbri Transport
Planting Strategy	Atkins Realis
Green Infrastructure Statement	Acer Ecology
Drainage Strategy (CC2594-CAM-ZZ-XX-RP-C-0002-P01)	Cambria
Design and Access Statement	Atkins Realis
Solar Panel Mounting System Datasheet	VAN DER VALK
Solar Panel Datasheet	Vertex S

Further to the advice received at pre-application stage, a Bat Method Statement and Lighting Strategy has been commissioned and these will be supported as soon as possible to accompany the planning application.

Site Description

Ysgol Gymraeg Rhyd y Grug is a Welsh Medium Primary School for pupils aged 3 - 11 years old, located in a picturesque setting adjacent to the River Taff, in Aberfan, Merthyr Vale. The village of Aberfan is located 4 miles to the south of Merthyr Tydfil and approximately 20 miles to the north of Cardiff. It sits within the Merthyr Vale valley, bounded to the west by the A470, and to the east by the River Taff.

Ysgol Gymraeg Rhyd Y Grug sits on a plateau above the River Taff, within Merthyr Vale, with relatively steep slopes rising ca. 260m to the east and west. The site itself is relatively flat and sits at approximately 133m above sea level.

The school sits within an idyllic, secluded setting, surrounded by mature, broad-leaf trees to the west, and long views of the hills to the east, beyond the River Taff.

Ysgol Gymraeg Rhyd-y-Grug serves the children of Aberfan and several nearby villages. Vehicular access to the site from north or south is via the A4054 Cardiff Road and a relatively circuitous route along the valley floor. Merthyr Vale Train Station is approximately 200m walking distance to the east of the school.

Vehicular arrival from the north leads to a parents car parking area and the main entrance gates, which are intercom linked and access controlled from the reception. Two pedestrian gates flank either side of the vehicular gate and are similarly power activated and served by intercom. The pedestrian route to the east traverses a footbridge prior to sloping upwards to a manually operated gate, which is locked and unlocked at the start and end of the school day to allow drop offs and pick ups.

The existing building is single storey: the infant block is located to the north and the junior block is located to the south; these were originally separate but they have now been connected by a narrow corridor link. Both blocks are based on the principle of a central hall surrounded by modular classroom clusters with lower ceiling heights. The plan form creates courtyards and recesses for outdoor learning and play areas; these also bring daylight into the centre of the school and allow views out. These arrangements help to define the character of the school with strong relationships between inside and outside spaces. The immediate area around the School is hard landscaped (tarmac) to suit the outdoor classrooms, external play area, as well as pedestrian and vehicular access. An area of maintained grass field is located to the east and north which is used for sports. To the west there is a small area of mature trees which have been designated as a Forest School area.

Site Appraisal

Planning History

It is understood that Ysgol Rhyd y Grug was constructed in the years following the Aberfan colliery disaster, which destroyed the former Aberfan primary school.

A review of Merthyr Tydfil CBC's Online Planning Registry indicates that the site is subject to the following planning history:

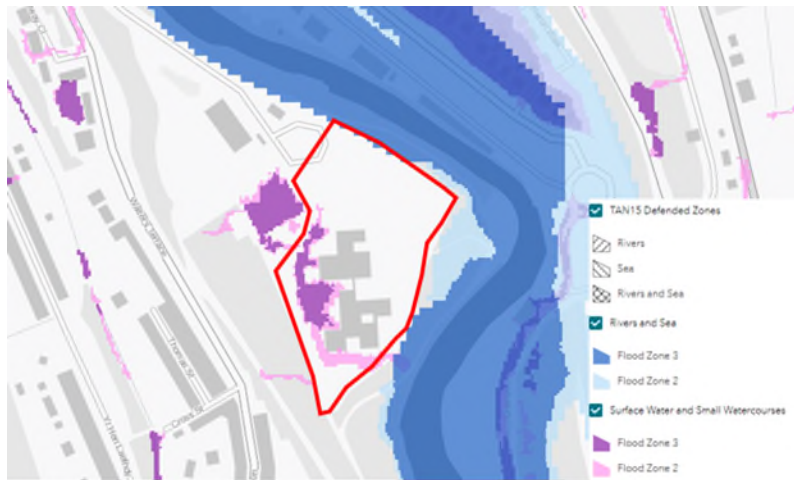
- P/12/0123 – 'Erection of replica dinosaur'. Approved June 2012.
- P/13/0182 – 'Erection of canopy'. Approved July 2013.

Flood Risk

According to the NRW Development Advice Flood Risk Map, the site is located within Flood Zone B 'Areas known to have flooded in the past'.



Whilst not adopted yet, the Flood Map for Planning confirms that the site is outside of the flood zone for rivers and seas. Parts of Ysgol Rhyd y Grug site is at risk of surface water flooding (see purple and pink below); this will need to be accounted for in any SAB application.



Heritage

A review of Cadw data indicates that the nearest identified heritage asset to Ysgol Rhyd y Grug is the Grade II Listed Aberfan War Memorial (Cadw ref: 80874). The reason behind this listing states: *"Included for its special interest as a distinctive war memorial with statue by a leading Welsh sculptor."*

The War Memorial is located approximately 100m to the west of Ysgol Rhyd y Grug.



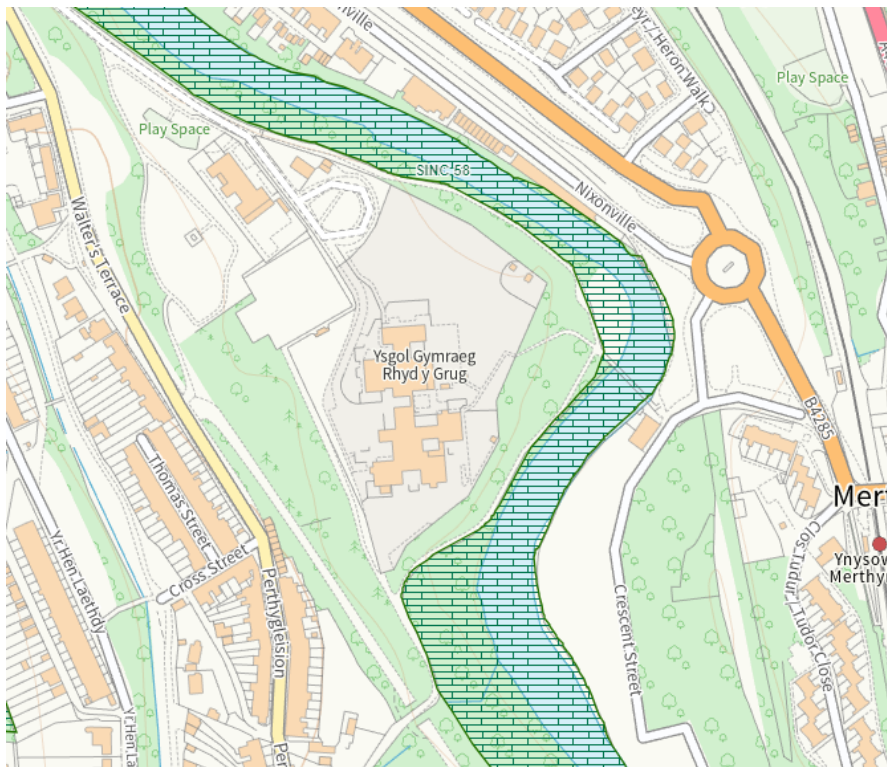
Coal Mining

The site is not located within a Development High Risk Area for coal, as per The Coal Authority's interactive map. This indicates that a Coal Mining Risk Assessment would not be required as part of any future planning application



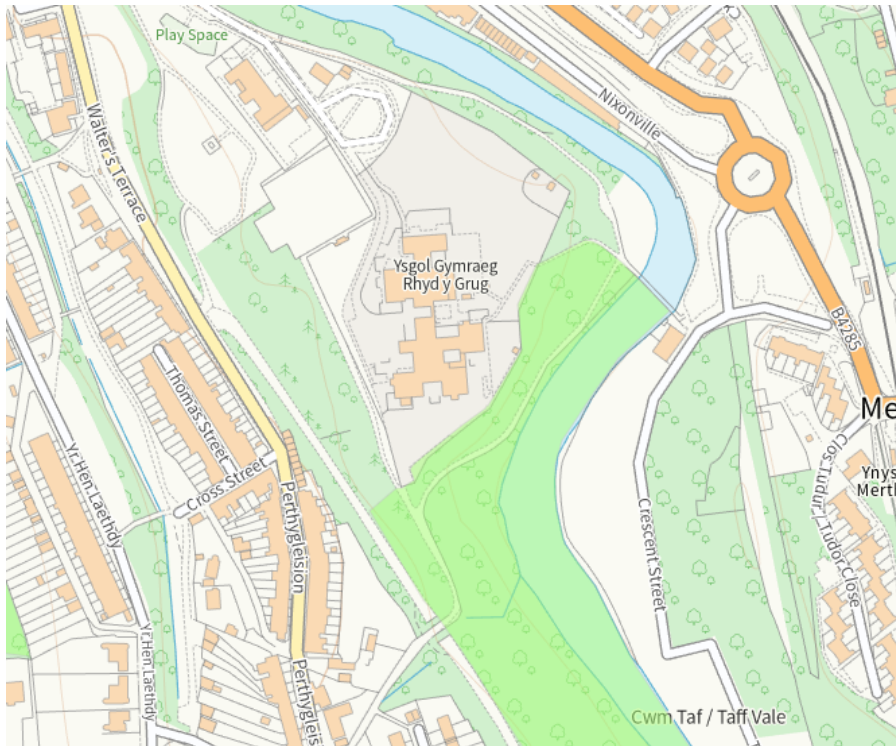
Sites of Importance for Nature Conservation (SINC)

Rhyd y Grug sits adjacent to the Afon Taf Site of Importance for Nature Conservation (SINC 58).



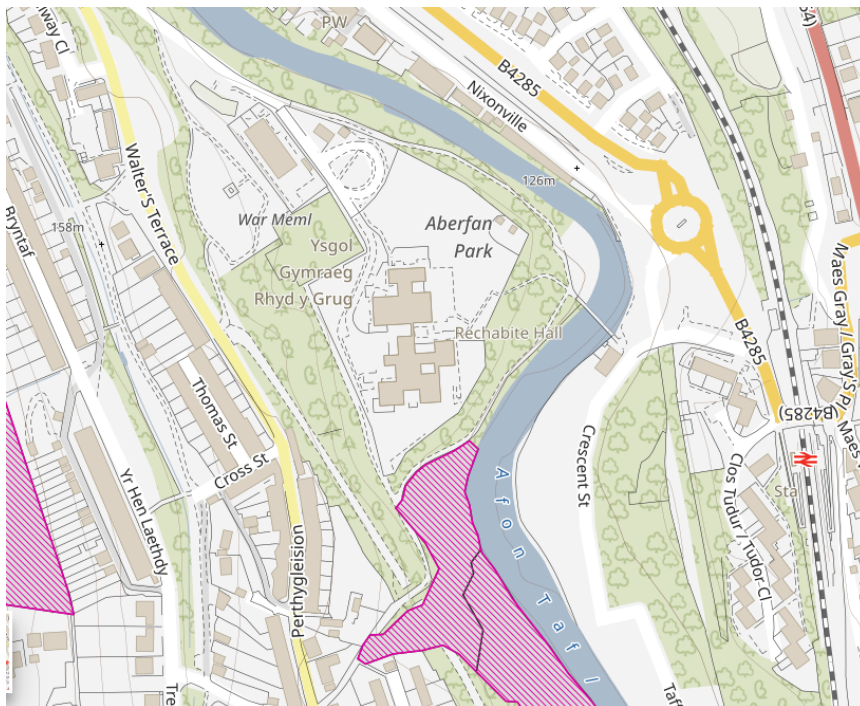
Green Infrastructure: Special Landscape Area

The site is located in close proximity to the Pontygwaith Special Landscape Area (SLA4).



Semi Ancient woodland

An area of semi ancient woodland is located to the south of the site.



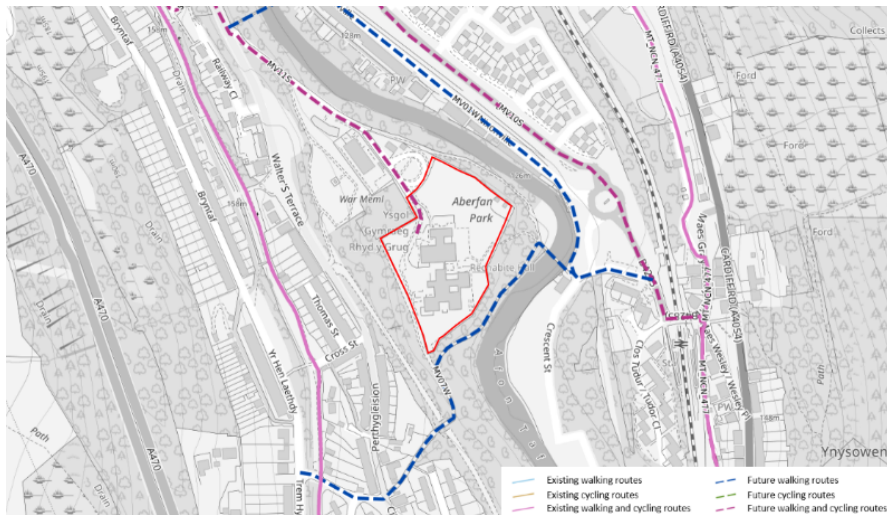
Allocated Open Space

Two large areas of Open Space are allocated within close proximity of the application site



Active Travel

A review of Welsh Government data on Active Travel indicates that the Taff Trail (west of site) is an identified Existing Walking & Cycling Route. Walter's Terrace is an identified Proposed Walking and Cycling Route, while the footpath east of the River Taff (near Nixonville) is an identified Future Walking Route.



Project Brief

The brief for the project is to:

- increase the current school role from 295 to 327 pupils;
- increase the nursery provision from 40 to 60 pupils;
- introduce provision for Meithrin, Community Room and Learning Resource Base;

- improve the existing school facilities where budget will allow;
- provide options on how the site could provide a 420 pupil, 2 form of entry school with 80 nursery pupils in the future.

The Proposal

In accordance with the brief, proposals include the provision of a new Learning Resource Base, Meithrin and Community Room and additional teaching spaces, and also proposes key adjustments to improve the spatial organisation of the existing school building. The below provides a synopsis of the proposals and the rationale behind the decision making;

Meithrin is seen as a standalone facility with its own access, own staff and sub-metering of utilities (albeit it was agreed that it can be physically connected to the school, to allow economy in materials required and efficiency in energy required).

It's proposed that the Community Room is also a separate entity from the school in order to minimise safeguarding risks and ease operating arrangements, but to also have a greater interface with the school as opposed to the Meithrin in terms of operation and access, and the school being able to use the Community Room when it's not booked for community use. Accordingly, this suggests a site arrangement with the Meithrin being furthest from the school, the Community Room being positioned between Meithrin and school, and the existing school arrangement remaining unchanged.

Logically, the LRB could also be included within the new build elements proposed, and thereby minimise any impact to the existing school arrangement. However, to ensure that the LRB is fully integrated with the rest of the school rather than being seen as, and functioning as, a separate addition it was agreed that this should be located in a remodelled area of the south western block of the school, allowing good proximity to the existing car park and drop off area- an important part of LRB students day; it has the potential for creating a secure, connected external space, with extended canopy and upgraded external fencing; and it allows a close connection to the rest of the school, being adjacent the Junior School hall.

It has become evident during client/design team discussions that the proposal will inevitably put pressure on the existing staffroom resulting from the increase in pupil numbers and subsequently staff. There was a clear preference for a single staffroom as opposed to the introduction of a secondary, smaller staffroom. Looking at the existing school objectively, it is also apparent that the existing maintenance workshop is significantly larger than necessary, and it has therefore been suggested that the staffroom move to the location of the maintenance workshop, a larger and more central space than the current staffroom. The maintenance workshop would then move to the remodelled south western block, being more discrete whilst maintaining good access to the car park. The current staff room location is to be returned to a classroom, consolidating the existing classroom arrangement, grouped around the adjacent activity area. This will entail relatively straightforward refurbishment works and will not require planning permission.

Finally, some adjustment works are proposed to allow the currently conjoined year 2 classrooms to become separate entities, both with their own access to the Infants Hall, the existing WCs, and also to the external garden area

The new build accommodation is proposed as single storey with a simple flat roof and three pop-up 'lanterns' above the larger spaces of the community room and play areas - an arrangement that is similar to the existing building, allowing the new build to sit harmoniously within its context. To align with SUDs and bio-diversity requirements, the main section of roof be planted as a green roof, attenuating rainwater run-off and limiting heat gain / loss. Photovoltaics are shown to the lantern areas allowing for energy generation and following the precedent set by the other existing school roofs. Canopies are proposed adjacent the play areas to provide sheltered external classroom areas, as well as shading to the areas of glazing, and a means of reflecting daylight to the back of these spaces through the clerestory glazing, to benefit daylight spread and uniformity. The canopies lead to the external covered walkway, linking the new build accommodation with the existing Infants school entrance.

Building elevations and sections have purposefully been kept simple and clean, aligning with the needs of the spaces within and with providing a cost effective building. The arrangement of 'pop up lanterns', modular curtain wall elements, and perimeter canopies is similar to that of the existing school.

External materials have only been discussed in brief with the Client at this stage in terms of any preferences or lessons learned. Materials seen as being appropriate: external cladding such as brick or metal cladding panels; hot melt, flat roof construction with tapered insulation, that allows for PV; all drainage to be external. It is requested at this stage that materials be controlled via appropriate planning condition.

Planning Policy

National Planning Policy

The Well-Being of Future Generations (Wales) Act 2015

The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires *"public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle"*. The Act sets out seven 'well-being' goals as follows:

- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
- A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

National Development Framework: Future Wales – The National Plan 2040

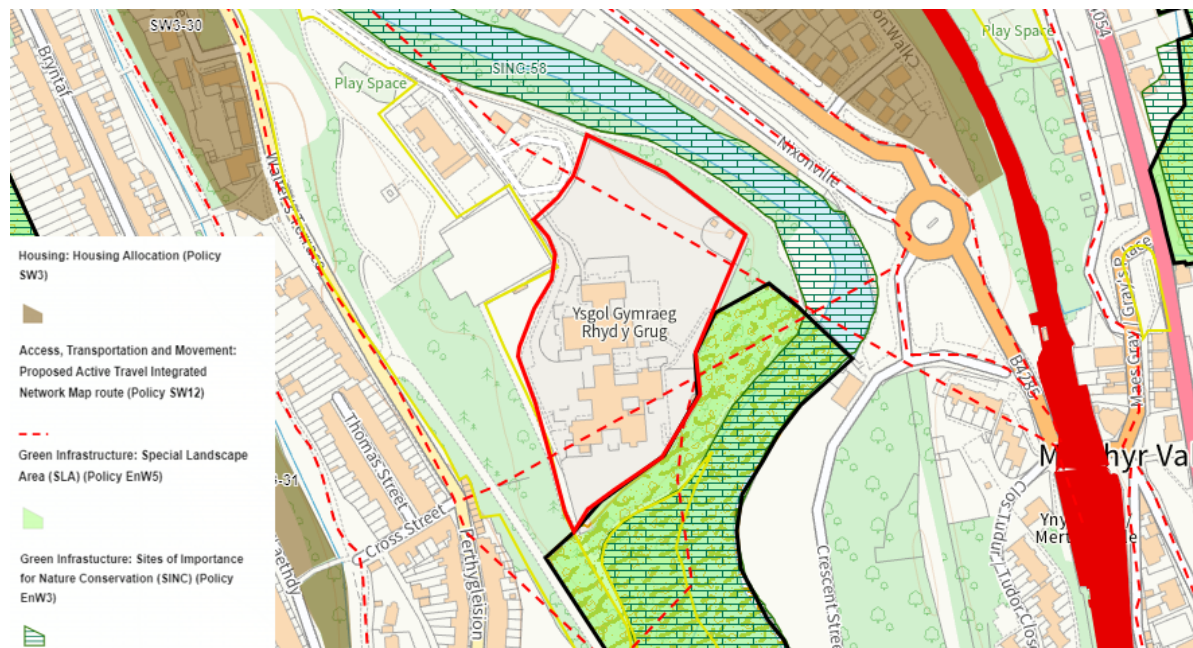
The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. 'Future Wales' sets out the Welsh Government's strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. The vast majority of planning applications are determined by Local Planning Authorities and are small scale developments of local rather than regional or national significance. Future Wales' focus is on national and regional spatial issues and as such, whilst its policies will need to be considered, the Local Development Plan (or extant Unitary Development Plan) policies will provide the detailed development management framework in the vast majority of cases.

Planning Policy Wales Edition 12

Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social,

economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.

In respect of access and inclusivity, para 3.5 identifies that *“Good design is inclusive design. Development proposals should place people at the heart of the design process, acknowledge diversity and difference, offer choice where a single*



design solution cannot accommodate all users, provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for everyone”.

Para 3.5 confirms that *“Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children. There will often be wider benefits to be gained through the sensitive consideration of such provision, for example, whilst the presence of visual cues will be invaluable in assisting those with hearing loss to engage in a noisy environment, a navigable environment will benefit all. Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport”.*

Para 3.25 confirms that *“The Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well-being goal”.*

Technical Advice Notes

The following Technical Advice Notes (TANS) are of relevance to the development proposal.

- Technical Advice Note 11: Noise;
- Technical Advice Note 12: Design;

- Technical Advice Note 18: Transport;
- Technical advice note 20: planning and the Welsh language
- Technical Advice Note 23: Economic Development.

Local Development Plan

The Merthyr Council Replacement Local Development Plan (RLDP) was adopted on 29th January 2020 and is the prevailing development plan for Merthyr Tydfil. Ysgol Rhyd y Grug is located within the defined settlement boundary for Aberfan and is brownfield land.

A review of the Merthyr Tydfil CBC LDP indicates that the following policies would be considered in respect of the proposed development of a learning and community facility at Ysgol Rhyd y Grug:

Policy	Relevant To
SW4	Settlement Boundaries
SW11	Sustainable Design and Placemaking
SW12	Improving the Transport Network
SW13	Protecting and Improving Local Community Facilities
EnW1	Nature Conservation and Ecosystem Resilience
EnW3	Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species
EnW4	Environmental Protection
EnW5	Landscape Protection
EcW8	Renewable Energy

Planning Pre-application

Prior to the submission of the application to the LPA, pre-application discussion were progressed with Merthyr CBC Local Planning Authority. An application was submitted in August 2024 and meeting held in early October 2024 and subsequent written advice was issued in November 2024. The pre-app response confirms that;

- The pre-application site lies within the 'settlement boundary – other growth area' and the proposed development would therefore be in accordance with LDP Policy SW4, which supports new development in this location provided it complies with other relevant policies;
- The proposed development would result in the loss of part of the existing playing field. The playing field is not a recognised open space. Nevertheless, no information has been included to explain how this area is currently used and how many children it currently serves. As such, it is advised that additional information be submitted in this respect to better understand the proposal and its potential impact. It should be noted however that the existing school is recognised as an existing community facility and the proposal to create a new teaching block at this site would undoubtedly serve to enhance the existing facilities and the pre-application proposed could therefore accord with LDP Policy SW13;
- The proposed side (northern) elevation of the new teaching block would become the most prominent elevation on approach to the school site. This would act as a 'frontage' of the school site and the arrangement of windows and use of materials should therefore be carefully considered;

- The proposed building, in terms of its overall height and design, would reflect the existing school building and ensure that the proposal relates sympathetically to its immediate context. The external steel canopy could also be considered acceptable in this context;
- Details of the proposed solar panels on the roof have not been included at this stage and should therefore be submitted with any formal application, which should include section details and the brochure details;
- The existing school site lies in a secluded location, away from residential properties, and as such, these works would not be considered to have any significant or adverse impact on the privacy or amenities of these neighbouring occupiers;
- Any additional noise or disturbance generated from the school site would not be deemed significantly greater and would therefore not result in any additional harm to the amenities of nearby occupiers, particularly since the nearest residential property is located over 120 metres away and at a significantly higher level to the school site;
- The Highway Engineer has considered the proposed development and has not raised any objections at this stage, but has requested additional information in the form of a construction management plan and a transport statement, to ascertain whether the impact of the new teaching block upon highway and pedestrian safety would be acceptable;
- The site lies outside a high-risk mining area, and as such, a Coal Mining Risk Assessment report would not be required in support of any subsequent formal application.
- The county ecologist has requested that the start and finish times for the bat survey work be included within the bat survey report. The new extension is proposed for the opposite side of the school to the position of the identified soprano pipistrelle roost. It appears that the bat roosting position is outside of the scope for any of the additional works and so there will be no direct impact on the identified roost. However, it is possible that without mitigation there may be a small amount of disturbance through increased noise, vibration and artificial lighting. A bat method statement will be needed to ensure there is no disturbance to the roost during the works.
- Ambient lux levels are relatively high around most of the buildings. The lights also appear to have a relatively high colour temperature, appearing white in nature.
- There will need to be enhancement of the site in line with the Environment (Wales) Act 2016. This must include an improvement in the lighting around the school with consideration, not only for the identified bat roost, but also for bats in general and other species impacted by artificial light at night. There should be liaison between the commissioned ecologist and the lighting professionals to produce a scheme that provides light when and where necessary, but also considers protected species that may be impacted. Internal and well as external lighting must be included in the review. Improvements to the amenity grassland onsite would also be a welcome enhancement, for example the addition of native wildflower areas and small native tree species. Other enhancements should include wildlife boxes. Gaps in fencing (13cm x 13cm) must also be created to allow passage of hedgehogs across/through the site.
- A proportionate green infrastructure statement needs to be submitted alongside a scheme demonstrating Net Benefit for Biodiversity. A long-term Landscaping, Habitat & Ecology Scheme (LHES) is also required.

Planning Appraisal

Principal of development

The site is within the settlement boundary for Aberfan, as detailed in the Merthyr Tydfil County Borough Council Local Development Plan (2016-2031), and is not subject to any strategic local plan allocations. The proposed development includes a new Learning Resource Base, Meithrin, Community Room, and additional teaching spaces, alongside key adjustments to improve the spatial organisation of the existing school building. While the proposal involves the loss

of part of the existing playing field, this area is used informally by the school, which will continue to utilise off-site sports facilities, ensuring no reduction in overall sports provision for the community.

The development complies with Policy SW13: Protecting and Improving Local Community Facilities by enhancing the capacity and functionality of the existing community facility. The proposal aligns with the policy's aim to support and protect local facilities, delivering modern, fit-for-purpose spaces that improve educational and community provision.

The site is suitable for development, subject to compliance with all relevant policies. It is not at risk of flooding or near any designated heritage assets, and access will remain via Walter's Terrace. While the site is adjacent to a Special Landscape Area and near a Site of Importance for Nature Conservation (SINC) and Ancient Woodland, careful consideration of LDP Policies SW11, SW13, EnW1, EnW3, EnW4, EnW5, and EcW8 will ensure the development respects these environmental sensitivities. An assessment of the development against these policies is provided in turn below.

Design and appearance

The proposed development consists of a single-storey building with a flat roof and three pop-up 'lanterns'. A green roof will meet SuDS and biodiversity requirements by attenuating rainwater run-off and limiting heat gain or loss. Photovoltaics will be installed on the lantern roofs, aligning with Policy EcW8. Canopies adjacent to play areas will provide shaded external classroom spaces, enhance daylight distribution via clerestory glazing, and connect to a covered walkway linking the new accommodation to the existing school entrance.

The design incorporates clean, functional elevations, pop-up lanterns, modular curtain walling, and perimeter canopies, echoing elements of the existing school. Materials include brick or metal cladding and a green flat roof. The western elevation, the most prominent on approach, features an attractive arrangement of windows, doors, and lanterns for a welcoming appearance.

The proposal complies with Policy SW11 by delivering a sustainable, inclusive design appropriate to its local context. The single-storey scale, flat roof, and green roof respect the surrounding environment, while photovoltaics and resource-efficient materials enhance sustainability. Clerestory glazing and canopies improve daylighting, internal comfort, and outdoor learning spaces. The layout integrates seamlessly with the existing school, ensuring accessibility and a cohesive townscape.

Ecology

A Preliminary Phase 1 Ecological Survey and a Bat Survey have been completed to support the application. The Phase 1 Survey confirms that the development footprint comprises modified grassland, developed land, and school buildings, while retained habitats include broadleaved woodland, scrub, grassland, and an allotment garden. Ecological assessments found no bat roosts or significant bat activity within the school building, but a sensitive lighting strategy is recommended to protect nearby woodland. There are no records of Great Crested Newts (GCN) within 1 km, and no adverse impacts are anticipated. No badger activity was identified, though precautionary measures are advised. The site offers limited habitat for reptiles and hedgehogs, presenting a low risk of harm during vegetation clearance. While notable invertebrate species were recorded within 1 km, any habitat loss can be mitigated through enhanced planting.

To mitigate ecological impacts, it is recommended that a Green Infrastructure Plan be developed, incorporating native species, bat roosts, hedgehog homes, and bird boxes. Biodiversity net gain should be achieved through hedgerow and tree planting, SuDS, and additional habitat features. The broadleaved woodland on-site should be retained with protective buffers and fencing, and construction activities should avoid the bird nesting season. If this is not possible a pre-commencement nesting bird check of the building should be conducted prior to the works to the existing building commencing on site. Pre-commencement walk overs for badgers and riparian species are recommended, along with barriers to protect habitats. The report confirms that a Construction and Environmental Management Plan (CEMP) and a Sensitive Lighting Strategy will be required to minimise impacts on wildlife. Compensatory planting, including wildflower meadows and hedgerows, alongside bird and bat boxes are recommended to further enhance biodiversity.

The Bat Survey confirms that the property has negligible internal potential for roosting bats due to its tight construction and high lux levels near the building. However, a day roost for two soprano pipistrelle bats was identified in roof jointing with lead flashing on the south side, where lower lux levels increased suitability. Emergence surveys conducted in July, August, and September 2024 recorded low bat activity, with soprano pipistrelle and noctule bats observed commuting and foraging along the site boundaries and near the River Taff. The south-facing porch consistently served as a day roost for soprano pipistrelles during the first two surveys, though no bats emerged during the third. The site was classified as Zone E3 (middle district brightness), with high lux levels near the building and lower levels at the boundaries, likely contributing to the low bat biomass observed. Proposed works on the northwest part of the site will not impact the confirmed roost on the south side.

To minimise risks to bats, works should avoid the active bat and bird breeding seasons, and measures should be implemented to prevent bat ingress during the active season for bats April to October. With adherence to these recommendations, the likelihood of significant impacts on bats is low.

In conclusion, the development is unlikely to adversely affect protected habitats or species, provided the recommended mitigation measures are implemented. These actions will help achieve biodiversity enhancement goals and ensure compliance with environmental regulations.

Tree Survey

The tree survey identified 22 trees, none of which require removal. Remedial works are recommended for two trees, and three others require monitoring. Replacement planting of at least three native trees is suggested along the north fence line to maintain tree stock. Suitable species include small-leaved lime, common beech, and silver birch. Mulching and proper spacing will support long-term growth and safety.

Planting Strategy

The planting strategy focuses on creating multi-functional green spaces that benefit both wildlife and the school community. It includes multi-stemmed birch trees and ornamental bed planting to improve amenity and soften fence lines. Wildlife enhancement areas include wildflower pockets, hedgehog houses, wild corners with natural vegetation, and bird/bat boxes. These measures aim to enhance biodiversity while creating functional, aesthetically pleasing spaces.

A high-quality landscaped entrance prioritizes pedestrian movement, offering level and inclusive access in a semi-public northern arrival space. Dedicated external spaces support outdoor play, exercise, and calm activities. The site integrates green infrastructure, including swales, wildflower meadows, and tree planting, enhancing biodiversity and stormwater management.

Green Infrastructure

The development integrates green infrastructure, including swales, wildflower meadows, and tree planting, enhancing biodiversity and stormwater management. Adhering to the Building with Nature Standards Framework, the proposal supports multifunctionality, climate resilience, and environmental net gain. Features such as rainwater harvesting and wildlife-friendly planting align with local policies, creating a climate-resilient, biodiversity-rich environment.

Impact on Ecology and GI

The proposed development complies with relevant environmental policies (EN1, EnW3, EnW4, EnW5) through a comprehensive approach to biodiversity, environmental protection, and landscape enhancement.

Key measures include:

- A Green Infrastructure Plan featuring hedgerows, native tree planting, and SuDS.
- Sensitive lighting, pre-construction surveys, and habitat enhancements to mitigate impacts on protected species.
- Biodiversity net gain through bird/bat boxes, wildflower meadows, and hedgehog homes.

The development avoids adverse impacts on the adjacent Pontygwaith Special Landscape Area (SLA) and nearby Sites of Importance for Nature Conservation (SINC). Retained woodland and protective buffers safeguard sensitive areas. Pollution risks during construction will be mitigated through a CEMP, ensuring protection of water, soil, and air quality. SuDS features manage surface water sustainably, aligning with Technical Advice Note (TAN) 15. Best practices during construction will minimise disturbances, such as noise and dust. The scheme respects the character of the adjacent SLA by retaining significant landscape features and introducing native and ornamental species to enhance ecological and visual quality.

Highways/Access

The application is supported by a Transport Statement prepared by Asbri Transport. The purpose of the report is to assess the transport impact of the development, including trip generation, access, parking, and active travel considerations. The proposal aims to increase the school roll from 346 to 387 pupils, and will also provide a Learning Resource Base (LRB) for pupils with Additional Learning Needs (ALN). Staff numbers will also rise from 31.5 to 40.5. Existing traffic surveys show a peak flow of approximately 136 vehicles in the morning and 114 vehicles in the afternoon during school peak hours (08:15-09:15 and 14:45-15:45).

There will be no significant changes to the access arrangements, although the school car park will be reconfigured to provide an additional 4 staff spaces and 1 accessible parking space. The school's access road is an unmarked single carriageway, with parking available along the road and within the school's internal car park.

The school is well-served by footpaths and pedestrian crossings, providing good access to the local area, with a footbridge over the River Taff. National Cycle Network (NCN) Route 8 and Route 477 are accessible from the site, offering strong cycling links to the surrounding area. The nearest bus stop is 500m away on Walters Terrace, and the nearest train station, Merthyr Vale, is 750m away, providing convenient public transport options.

The local area has low traffic accident rates, with no collisions involving children in the last five years. The proposed development is not expected to cause significant congestion or delays during peak periods.

In conclusion, the Transport Statement demonstrates that the proposed development will not result in significant adverse impacts on the local transport network. The school's access, parking, and pedestrian infrastructure are sufficient to accommodate the forecast increase in pupil and staff numbers, with no major changes required to the existing road layout or traffic management. The development is in line with local transport policies and offers good connections for pedestrians, cyclists, and public transport users.

The proposal complies with Policy SW12: Improving the Transport Network by incorporating several elements that promote sustainable transport and reduce the need for car travel. The development enhances pedestrian infrastructure by maintaining and improving existing footpaths and pedestrian crossings, encouraging walking to the school. Additionally, the site is well-connected to National Cycle Network (NCN) Route 8 and Route 477, promoting cycling as a sustainable mode of transport. Public transport access is also a key feature, with a bus stop located 500 meters away and Merthyr Vale train station situated 750 meters from the site, ensuring easy access to the school via bus or train. While the scheme includes a reconfiguration of the school car park to provide additional staff parking, it does not significantly alter existing access arrangements, focusing instead on promoting alternative transport options. Overall, the scheme supports the policy's objective of encouraging a modal shift towards sustainable transport and reducing reliance on private cars.

Drainage

Proposals incorporate Sustainable Urban Drainage as a first principle. To align with SUDs and bio-diversity requirements the main section of roof be planted as a green roof, attenuating rainwater run-off. A separate SAB application will be progressed with the relevant authorities.

Conclude

The proposed development balances the need for enhanced educational facilities with the protection and enhancement of natural resources. By integrating sustainable design, biodiversity measures, and improved transport

infrastructure, the scheme complies with relevant policies, benefiting the community and the environment. It is respectfully requested that the LPA approve this well considered planning application which is compliance with the Merthyr Tydfil Local Development Plan.

Yours sincerely,

A handwritten signature in cursive script, reading "Llinos Hallett".

Llinos Hallett

Associate