



Planning & Retail Statement

Aldi Stores Limited
Plymouth Street
Merthyr Tydfil



London



Harrogate



Bristol

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Executive Summary

This Statement has been prepared on behalf of Aldi Stores Limited in support of an application to extend the existing store building, together with the extension and re-configuration of the car park, and other external works, at the Aldi store on Plymouth Street, Merthyr Tydfil.

The proposal seeks to extend the building by an additional 413 sq. m (GIA), and lead to 392 sq. m of additional retail floorspace. The store will be extended to the front elevation.

In addition, the proposal incorporates external alterations to elevational treatments including a new lobby. Further external works include the extension and reconfiguration of the car park alterations to the car park.

The planning application proposes an extension and reconfiguration to the existing foodstore to provide a modest increase to the sales area to enable the store to be brought up to the standard of other Aldi stores. It will improve efficiency and operations at the store, as well as the customer experience. The extension is unlikely to intensify traffic levels at or surrounding the site. In addition, the modest increase in retail sales area would not require additional or increased deliveries to the store.

The proposed extension will have significant regenerative and economic benefits, whilst ensuring the scheme integrates with the existing surroundings and site parameters.

As set out in this Report, the proposal is considered acceptable in design, amenity, highways, and retail policy terms.

1. Introduction

- 1.1. Planning Potential, on behalf of Aldi Stores Limited ('Aldi'), submits this Planning Statement in support of a full planning application for an extension to the existing Class A1 Aldi discount foodstore at Plymouth Street, Merthyr Tydfil, CF47 0TP. The application proposes the demolition of the existing car sales building, boundary wall, and forecourt to facilitate an extension to the store building, an extension and re-configuration of the existing car park, together with elevational alterations and other external works.
- 1.2. The application proposal is described as follows:

'Demolition of the existing car sales building, boundary wall, and forecourt to facilitate the extension to existing foodstore, an extension and re-configuration of the existing car park, elevational alterations, and other external works'
- 1.3. This Statement addresses all of the relevant planning policy considerations associated with the proposed development, but should be read in conjunction with other documents and drawings submitted in support of this application.

Background

- 1.4. The existing Aldi store was granted planning permission in the 1990s. The store opened in 1996, and has been trading ever since. The existing Aldi store has successfully served the town for over two decades.
- 1.5. An opportunity has arisen to expand the store size and bring it in line with the more recent Aldi stores in the region. Aldi is keen to keep a store in this location and is therefore seeking opportunity for extend the current store to allow for more retail space. The location of the store is desirable with it being visible from the major roundabout.
- 1.6. The closest existing Aldi stores are located at The Walk, Ebbw Vale (12km to the north east), New Road, Tir-y-Berth (14 km to the south east), and Cymmer Road, Porth (14 km to the south west).
- 1.7. There has been a requirement to extend the existing store for some time. Due to the age of the store, it is under sized in terms of its sales area. The proposed extension would improve all aspects of the store, to the benefit of customers and staff.
- 1.8. The principle of retail use is well established at the site, having accommodated an Aldi store for many years.

Retail Context

- 1.9. National policy applying to proposals involving retail development is set out at Chapter 4 (Retail and Commercial Development) of Planning Policy Wales Edition 11 (PPW) (February 2021).
- 1.10. Paragraph 4.3.14 states that when determining planning applications for retail uses, planning authorities should first consider whether there is a need for additional retail provision.
- 1.11. Paragraph 4.3.26 states that all retail planning applications or retail site allocations of 2,500 sq. metres or more gross floorspace that are proposed on the edge of, or outside designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment.
- 1.12. Paragraph 4.3.18 states that the Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. In implementing this policy, planning authorities should adopt a sequential approach to the selection of new sites in their development plan and when determining planning applications for retail and other complementary uses.
- 1.13. Policy AS18 (Retail hierarchy) states that Merthyr Tydfil Town Centre is the favoured location for retail development, being situated at the head of a retail hierarchy. Outside the defined centres, proposals will be subject to an assessment of need and a strict application of the sequential test. Proposals will then only be permitted where they avoid causing harm to town/local centre vitality and viability.
- 1.14. The scale of the proposed extension (413 sq. m gross) falls considerably below the threshold for (retail) impact assessments set out in Paragraph 4.3.26 of PPW.
- 1.15. On the basis that the proposed works are minor and with the extension being significantly below the nationally set threshold of 2,500 sqm, a full retail impact assessment is not required and has not been undertaken in this instance.
- 1.16. However, for robustness, a proportionate need and impact assessment has been included at Section 4 of this report.

Report Structure

1.17. This statement is set out as follows:

- Section 2 – Summarises the site context and the development proposals;
- Section 3 – Sets out the planning and retail policy context against which the proposal should be assessed, including PPW and the Development Plan;
- Section 4 – Sets out our assessment of key planning issues relating to the proposed development; and
- Section 5 – Presents our summary and conclusions.

2. Site Context

The Site

- 2.1. The total application site area extends to 0.59 ha. The existing Aldi site (Class A1) currently consists of the food store and a car park which is accessed from a road coming off of High Street, and Simon Jones Car Sales (Sui Generis), that includes a car forecourt and small office.
- 2.2. The existing Aldi store has a gross floor area of 1,455 sq. m (GIA), including a 979 sq. m sales area. The building is located in the south of the site, with customer parking and landscaping occupying the remainder of the site.
- 2.3. A car sales business, Simon Jones Car Sales, is located on the northern boundary of the site separated by a retaining wall and fence. This area will be the acquired land for the proposed Aldi extension.
- 2.4. The previously developed brownfield site is within the defined Settlement Limit for Merthyr Tydfil as defined by the Local Plan. The site is considered edge-of-centre in retail terms, as defined by Planning Policy Wales 11 (2021).
- 2.5. The site is located within Flood Zone C2 as defined by the Natural Resources Wales Development Advice Map.
- 2.6. The site is within a Landscape of Outstanding Historic Interest (Merthyr Tydfil) and Urban Character Area - UCA 4 (Policy CW1 of the Local Plan).
- 2.7. The River Taff runs closely along the south side of the building with Plymouth Street (A4054) and A4102 enclosing the site at the North and West boundary. East of the site is a temporarily closed "Castle Bingo" building. The access road also serves the carpark for Castle Bingo. On the West boundary, stairs allow pedestrian access into the site.
- 2.8. The site is accessed off High Street and is well connected to the town centre and the A470. The Aldi building consists of a single-storey pitched-roof store with white rendered facades between brickwork pillars. The roof is covered with interlocking concrete tiles.
- 2.9. The site itself is relatively flat however there is a considerable level change on the north-west boundary where the road gradually slopes upwards to bridge over the water.
- 2.10. Across Plymouth Street are a collection of industrial buildings and a group of mature trees that sets a buffer along the train tracks.
- 2.11. The adjacent roundabout features a stonewall, which exhibits a sculptural piece, and it sits closely to the north-western boundary. The road A4102 runs off the roundabout towards a bridge that crosses over the River Taff. This road is at a higher level to the site and a set of stairs over a bank brings the pedestrian access to Aldi's site level. On the other side of the roundabout is St Tydfil Court, a 12 storey high-rise building of retirement housing.
- 2.12. On the south-eastern boundary, is a carpark that serves Castle Bingo. The building is two storeys high, clad with beige bricks and metal. There are a few trees planted around the entrance of the building.
- 2.13. Directly behind the back of the store runs the River Taff with a variety of trees and bushes either side. Further south lies a skate park, leisure centre, food chains, and the Welsh Government building.

Relevant Site Planning History

Simon Jones Cars Site

- Ref. P/13/0143 - A planning application for the erection of single storey side extension to the Simon Jones Cars office was approved in June 2013.

Aldi Site

- Ref. P/06/0671 - A planning application for external changes to building and erection of glass canopy was approved in 2007.
- Ref. P/05/0495 - A planning application for an extension to provide 320 sq. m. of retail and storage floorspace was approved in December 2015.
- Ref. P/16/0069 - A planning application for external alterations to existing store, including alterations to elevational treatment and glazed shopfront and minor repairs to external areas (including re-surfacing of car park etc.) was approved in April 2016.

3. The Proposed Scheme

The Extension

- 3.1. This planning application proposes the demolition of the existing car sales building (17 sqm), boundary wall, and forecourt to facilitate the extension and reconfiguration to the existing foodstore to provide a modest increase to the sales area. The new extension to the existing building will be to the front elevation (south east facing). The gross internal area will increase from 1,455 sq. m to 1,868 sq. m.
- 3.2. The proposal will result in an additional 413 sq. m of gross floor area, and 392 sq. m of net additional retail floorspace. The extension will allow the retail floor area of the store to increase from 979 sq. m to 1,371 sq. m, whilst providing a more up to date merchandising arrangement, and increased number of services tills increasing efficiency for its users.
- 3.3. Please see Table 1 below showing the extent of the floorspace to be increased. The individual elements of the proposal are explained below.

Table 1: Floorspace schedule

	Sales Area	Total GIA
Existing (sqm)	979	1,455
Proposed (sqm)	1,371	1,868
Change (sqm)	+392	+413

External and Elevational Amendments to the Building

- 3.4. The store extension will have minimal impact on the appearance of existing store. The extension will begin from the end of the existing roof and continue as a flat roof with an external entrance lobby. To allow the extension to happen with limited space on the western boundary, the external wall of the extension will have a 30 degree chamfer.
- 3.5. The external finishes will remain as it is with white render shown on the exterior walls and red brickwork shown at the columns. Silver cladding will also be retained either side of the roof which will be re-tiled using the same materials. The rear appearance of the building will remain the same with the existing PV panels retained also.
- 3.6. Full height shopfront glazing will continue from the south west facing elevation into the extension and will provide an attractive frontage to the store. Furthermore, the existing standing glass canopy will be replaced with one that cantilevers of the extension over the external entrance lobby, which will provide a distinguishable and attractive main entrance into the store.

New Entrance Lobby

- 3.7. An external lobby (21 sq. m (GIA)) is proposed at the entrance/exit (north east facing elevation) of the store to improve the operational efficiency of the store. The lobby will provide a clear entrance and exit for customers when entering/exiting the store and will also help with the flow of pedestrians in and out of the store.
- 3.8. The new lobby will sit under the canopy, and the materials/finishes will match the approved materials/finishes at the store frontage

Car park and Access

- 3.9. Aldi will acquire the land now used as a car sales so that the car park can also be extended to make up for the spaces lost from the store extension. The existing
- 3.10. The developed car park will provide a total of 82 parking spaces with six dedicated to 'Parent & Child' spaces, four disabled spaces, two Click and Collect spaces, and four EVCP spaces. The proposal results in an increase of 2 customer parking spaces.
- 3.11. Both the site ingress and egress will be maintained from Plymouth Street. The main site entrance will be maintained during the progression of the scheme. Pedestrians are safely directed from the site entrance to the store entrance by pedestrian crossings and pavement. Access between the car park and store will be served by level access.

Other external changes

- 3.12. The building entrance position, orientation, and relationship with the rest of the site remains similar to the existing. The position of the loading bay remains also remains unchanged. The existing retaining wall and fence adjacent to the estates signage and existing car sales kiosk is to be removed.
- 3.13. A new set of stairs will also be built, replacing the existing stairs, to maintain suitable pedestrian access from the path above. Provision of trees in the middle of the car park will be beneficial for the loss of existing trees.
- 3.14. Plant enclosure will be maintained at the rear of store away from the public areas. New external plant and Air Source Heat Pumps are proposed to the rear of the store.

Aldi Stores Ltd.

- 3.15. The existing store no longer meets Aldi portfolio requirements in terms of retail sales floorspace, external appearance or customer experience. Therefore, the extension to the existing store to suit up-to-date retailing and customer requirements is necessary.
- 3.16. Aldi stores are modest-scale supermarkets, selling a deliberately restricted product range consisting of approximately 1,500 lines. The result is that Aldi do not stock numerous types of one product (e.g., pet food, bread ranges etc.), but rather provide one line (and most often one size) of a given product. The extension proposal would not alter this approach, but would instead provide a more spacious environment for customers.
- 3.17. On this basis, Aldi complements, rather than competes with, existing local traders and generates considerable propensity for linked trips and associated spin-off trade. Store opening hours are also more limited than traditional convenience shops/newsagents, which further limits direct competition with such outlets.
- 3.18. The internal store layout and operation has been designed to be efficient and practical for use by customers; these matters are routinely reviewed and monitored, and adjustments made to the model as required. Retail is, of course, a constantly evolving and dynamic sector and Aldi are committed to improving operations and shopping experience to meet the demands and expectations of customers.
- 3.19. It is the above core philosophy that underpins Aldi's operator model and is fundamental to their store development and profitability.

4. Planning Policy Context

- 4.1. The following section provides a summary of the relevant national and local planning policy relevant to the proposed development of an Aldi foodstore at the application site.

Future Wales: The National Plan 2040

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

Well-being of Future Generations (Wales) Act 2015

- 4.3. The Well-being of Future Generations (Wales) Act 2015 ('the Act') gives a legally-binding common purpose – the seven well-being goals – for national government, local government, local health boards and other specified public bodies. It details the ways in which these bodies must work, and work together, to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals

Planning Policy Wales (2021)

- 4.4. Planning Policy Wales (PPW), Edition 11, was published in February 2021 and sets out the land use planning policies of the Welsh Government. The PPW translates the Government's commitment to sustainable development into the planning system so that it can play an appropriate role in moving toward sustainability.
- 4.5. The PPW is supplemented by a series of Technical Advice Notes (TANs) which will be discussed in more detail below.

Economic Development

- 4.6. PPW 11 (2021) recognises the role that retailing plays in supporting the economy and provides the following guidance on Economic Development:
- *'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' (Paragraph 5.4.1)*
 - *'Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration' (Paragraph 5.4.4)*
 - *'When considering planning applications, planning authorities should seek the views of all relevant local authority departments and external specialist public bodies, particularly those with responsibility for Economic Development... as this can assist in the identification of multiple benefits and an integrated approach to balancing priorities against policy on an individual basis' (Paragraph 2.29)*

Retail Guidance

- 4.7. National policy applying to proposals involving retail development is set out at Chapter 4 (Retail and Commercial Development) of the PPW 11 (2021).
- 4.8. Paragraph 4.3.3 states that the Welsh Government's objectives for retail and commercial centres are to:
- promote viable urban and rural retail and commercial centres as the most sustainable locations to live, work, shop, socialise and conduct business;
 - sustain and enhance retail and commercial centres' vibrancy, viability, and attractiveness; and
 - improve access to, and within, retail and commercial centres by all modes of transport, prioritising walking, cycling and public transport.
- 4.9. Paragraph 4.3.18 states that the Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. In implementing this policy, planning authorities should adopt a sequential approach to the selection of new sites in their development plan and when determining planning applications for retail and other complementary uses. By

adopting a sequential approach, first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres.

- 4.10. Paragraph 4.3.14 states that in deciding whether to identify sites for comparison, convenience or other forms of retail uses in development plans or when determining planning applications for such uses, planning authorities should first consider whether there is a need for additional retail provision.
- 4.11. Paragraph 4.3.26 states that all retail planning applications or retail site allocations of 2,500 sq. metres or more gross floorspace that are proposed on the edge of, or outside designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment.

Technical Advice Notes (TANs)

- 4.12. TAN 4 (2016) specifically relates to retail and commercial development.
- 4.13. Objective 1 of TAN 4 reflects the 'town centre first' approach of the PPW and states that viable urban and rural retail and commercial centres need to be promoted as the most sustainable locations to live, work, shop, socialise and conduct business.
- 4.14. Part 6 sets out the Tests of Retail Needs. The retail needs tests are of a quantitative and qualitative nature, and are required to be undertaken for any application in an edge-of-centre or out-of-centre location which is not in accordance with an adopted development plan. It also notes that this is the starting point for planning new retail development in both development plans and development management.
- 4.15. Paragraph 6.3 clarifies that there is no particular methodology prescribed by the Welsh Government, instead developers and LPAs are encouraged to prepare assessments in a clear logical and transparent way, with robust and realistic evidence.
- 4.16. Paragraph 6.5 confirms that quantitative retail need should be established, before other, qualitative aspects of need are considered. Paragraph 6.6 states that the latter is harder to justify and will be subject to close scrutiny. It notes that the overall aim of assessing qualitative need is to achieve an appropriate distribution and range of sites for stores to meet the need of all communities, particularly where provision is inadequate.
- 4.17. Part 7 identifies the sequential test approach which requires that only when retail and commercial centres and edge of centre locations have been considered and found to be unsuitable can out-of-centre options within, and then outside, a settlement area be considered.
- 4.18. Paragraph 7.4 provides guidance on the application of the Test, noting that edge-of-centre proposals should not normally be located more than 200 to 300 metres from the edge of the centre.
- 4.19. The same paragraph also states that the size of the retail and commercial centre, local topography, and presence of physical barriers to access may influence any assessment. For example, it may limit the area that can be considered edge-of-centre for a smaller or more constrained centre.
- 4.20. Finally, on this issue, paragraph 7.5 states that 'developers and retailers should be flexible and innovative about the format, design and scale of proposed development and the amount of car parking needed, tailoring these to fit local circumstances.'
- 4.21. Paragraph 8.2 outlines the requirements for retail impact assessments. Retail applications of 2,500 sq. metres or more gross floorspace that are proposed on the edge of, or outside retail and commercial centres should be supported by a retail impact assessment provided by the developer. It notes that smaller retail planning applications or site allocations may also be assessed where local planning authorities believe it will have a significant impact on a retail and commercial centre.

Development Plan

- 4.22. The Merthyr Tydfil Replacement Local Development Plan (LDP) 2016 - 2031 provides the local planning policy framework for the area and was adopted by Council in 2020. It is the basis for land use planning decisions in the County Borough, excluding Brecon Beacons National Park.

The Merthyr Tydfil Replacement Local Development Plan (LDP) 2016 - 2031

- 4.23. Policy SW4 (Settlement Boundaries) states that to encourage development within urban areas, support the re-use of previously developed land, and to protect and support the functioning of our rural economy and the countryside, Merthyr Tydfil's settlement boundaries will be defined as a Primary Growth Area.

- 4.24. Policy SW11 (Sustainable Design and Placemaking) states that development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design.
- 4.25. Policy CW1 (Historic Environment) states that the integrity of our historic environment assets will be conserved and enhanced. Development proposals will only be permitted where it can be demonstrated they would preserve or enhance the architectural quality, character or the historic or cultural importance of our designated historic environment assets.
- 4.26. Development affecting undesignated historic environment assets including, Locally Listed Buildings or structures, Landscapes of Outstanding Historic Interest in Wales, Urban Character Areas and Archaeologically Sensitive Areas should have regard to their special character and archaeological importance.
- 4.27. Policy EnW1 (Nature Conservation and Ecosystem Resilience) states that development proposals will be required to promote the resilience of ecosystems. In particular, proposals will be required to maintain and enhance biodiversity interests unless it can be demonstrated that:
- The need for the development clearly outweighs the biodiversity value of the site; and
 - The impacts of the development can be satisfactorily mitigated and acceptably managed through future management regimes
- 4.28. Policy EnW4 (Environmental Protection) states that development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:
- Pollution of land, surface water, ground water and the air;
 - Land contamination;
 - Hazardous substances;
 - Land stability;
 - Noise, vibration, dust, odour nuisance and light pollution; or
 - Any other identified risk to public health and safety.
- 4.29. Policy EcW3 (Retail Hierarchy – Supporting Retailing Provision) states that Merthyr Tydfil Town Centre is the favoured location for retail, leisure, and other complementary development, being situated at the head of a retail hierarchy. Proposals for new and enhanced retail, leisure, and other complementary provision in all these centres will be permitted where they improve the vitality and viability of the centre(s) concerned.
- 4.30. Outside the above centres, proposals will be subject to an assessment of need and a strict application of the sequential test. Proposals will then only be permitted where they avoid causing harm to town/local centre vitality and viability
- 4.31. Policy EcW4 (Retail Allocation) states that to support the Hoover Strategic Regeneration Area land is allocated to provide 400 sqm for local retail provision.
- 4.32. Policy EcW5 (Town and Local Centre Development) states that development enhancing the vitality and viability of the Town and Local Centres will be supported.
- 4.33. Policy EcW6 (Out-of-Town Retailing Areas) states that proposals for retail development on new sites or existing retail areas in out-of-town locations, including changes of use, extensions, the merger or subdivision of existing units or amendments to existing planning conditions relating to the sale of goods will only be permitted where:
- It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing town or local retail centre, and
 - The proposal would not either individually or cumulatively with other existing or consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the town or local centres.
- 4.34. Policy EcW8 (Renewable Energy) states that the LPA will support the use of renewable energy as a tangible means of reducing our local carbon footprint, where appropriate to do so

- 4.35. Policy SW12 (Improving the Transport Network) states that development that encourages a modal shift towards sustainable transport will be supported, including the enhancement of pedestrian, cycle, rail, and bus facilities, in addition to any necessary road improvements. Development proposals will be expected to demonstrate how they reduce the need to travel and encourage the use of sustainable transport.

Supplementary Planning Guidance (SPG)

- Supplementary Planning Guidance Note No.3 – Shopfront Design (2013)
- Supplementary Planning Guidance Note No.4 – Sustainable Design (2013)

5. Planning Assessment

Principle of Retail Development

- 5.1. The principle of development and retail use on the site was established by the opening of the Aldi foodstore in 1996 and the continuous trading by Aldi ever since. The principle of development on the existing car sales use on the extended/new part of the site was established via the erection of the car sales building and forecourt which has been trading for many years.
- 5.2. The store lies directly adjacent to the Primary Shopping Area for Merthyr Tydfil. Accordingly, it is considered that the principle of retail development on this site, and within the wider area, is established.
- 5.3. The proposed modest extension to the existing foodstore at Plymouth Street, Merthyr Tydfil will provide an enhanced accessible and sustainable neighbourhood shopping facility that will be available to all residents of this area. Additionally, the extended provision of low-priced goods, will benefit those on lower incomes.
- 5.4. Furthermore, the proposed development will improve the efficiency and operation of the store, as well as the customer experience, meeting their ever-changing demands.
- 5.5. On this basis, it is considered that the modest extension of the store is in accordance with Policies SW4, EcW3, EcW5 and EcW6 of the Local Plan and PPW (2021).

Principle of Extension to Existing Store

- 5.6. The proposed extensions seek an additional 413 sq. m gross additional floor area, to create a 392 sq. m increase in net retail floorspace. The extension is proposed adjacent to the front of the store (north east facing elevation). A new lobby is also proposed of circa 21 sq. m on the north east facing elevation.
- 5.7. The proposed extension is unlikely to increase customer numbers at the store. Moreover, it will seek to improve the efficiency and operation of the store, and experience for existing customers. Therefore, traffic levels will not intensify at or surrounding the site. In addition, the modest increase in retail sales area unlikely to require additional deliveries to the store.
- 5.8. As the site is located in an out of centre location, an assessment of need and compliance with the sequential approach is required as set out in the next sub-section.
- 5.9. On this basis, it is considered that the modest extension of the store is in accordance with Policies SW4, EcW3, EcW5 and EcW6 of the Local Plan and PPW (2021).

Retail Assessment

- 5.10. National policy applying to proposals involving retail development is set out at Chapter 4 (Retail and Commercial Development) of Planning Policy Wales (PPW) (2021).
- 5.11. Paragraph 4.3.14 states that in deciding whether to identify sites for comparison, convenience or other forms of retail uses in development plans or when determining planning applications for such uses, planning authorities should first consider whether there is a need for additional retail provision.
- 5.12. Paragraph 4.3.26 states that all retail planning applications or retail site allocations of 2,500 sq. metres or more gross floorspace that are proposed on the edge of, or outside designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment.
- 5.13. Policy AS18 (Retail hierarchy) states that Merthyr Tydfil Town Centre is the favoured location for retail development, being situated at the head of a retail hierarchy. Outside the defined centres, proposals will be subject to an assessment of need and a strict application of the sequential test. Proposals will then only be permitted where they avoid causing harm to town/local centre vitality and viability.
- 5.14. The scale of the proposed extension (413 sq. m gross) falls considerably below the threshold for (retail) impact assessments set out in Paragraph 4.3.26 of PPW 11 (2021).
- 5.15. On the basis that the proposed works are minor and with the extension being significantly below the nationally set threshold of 2,500 sqm, a full retail impact assessment is not required and has not been undertaken in this instance.
- 5.16. For robustness, a proportionate need and impact assessment has been undertaken.

Need

- 5.17. PPW (2021) states that evidence should demonstrate whether retail provision is adequate or not, by assessing if there is further expenditure capacity in a catchment area (quantitative need) or if there is a lack of retail quality, range of goods or accessibility (qualitative need).
- 5.18. Paragraph 4.3.15 of PPW (2021) states that Need may be quantitative, to address a quantifiable unmet demand for the provision concerned, or qualitative. Precedence should be given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace, particularly as a basis for development plan allocations.
- 5.19. Paragraph 4.3.16 of PPW (2021) states that qualitative assessment should cover both positive and negative aspects and may become an important consideration where it:
- supports the objectives and retail strategy of an adopted development plan or the policies in this guidance;
 - is highly accessible by walking, cycling or public transport;
 - contributes to a substantial reduction in car journeys;
 - contributes to the co-location of facilities in existing retail and commercial centres;
 - significantly contributes to the vibrancy, attractiveness, and viability of such a centre;
 - assists in the alleviation of over-trading of, or traffic congestion surrounding, existing local comparable stores;
 - addresses locally defined deficiencies in provision in terms of quality and quantity, including that which would serve new residential developments; or where it; alleviates a lack of convenience goods provision in a disadvantaged area
- 5.20. Technical Advice Note 4, paragraph 6.7 states that Planning Policy Wales highlights cases where qualitative need may be justified. It advises that it is unlikely that any of these aspects on their own could justify new retail development; rather a combination of several of these issues could make the case for further provision.
- 5.21. There are several factors listed in paragraph 6.7 which can be considered as qualitative benefits.
- 5.22. Firstly, the application site, despite being edge of centre, is located at an established retail destination. The site is occupied by an Aldi store which already benefits from well-established travel patterns. The proposal can therefore benefit from these existing shopping patterns.
- 5.23. The store lies directly adjacent to the Primary Shopping Area for Merthyr Tydfil, and therefore well placed to complement existing retail uses, and facilitate linked trips between the Aldi foodstore and the town centre including the large Tesco Extra. Furthermore, the site is located in close proximity to residential properties allowing for walk in customers, as well as by public transport and cycling.
- 5.24. Secondly, the application site is located in an accessible location. As set out above, it is located within a wider residential area, so it is in an easily accessible location for cyclists or people on foot. Additionally, bus stops are located directly outside the application site on High Street. These bus stops serve several routes (24, 78, 79, 81, E79, S79, S80, T4 TrawsCymru, T4C, and X4), and provide direct links to Aberfan, Bedlinog, Treharris, Nelson, Pontypridd, and Cardiff. The site is therefore highly accessible.
- 5.25. Additionally, the proposal has significant benefits in terms of improving convenience floorspace in a disadvantaged area. The proposal will significantly improve the shopping experience, and will lead to a modest increase in the range of goods that can be sold from the store.
- 5.26. Finally, the proposal will enable the creation of an additional five job positions.
- 5.27. It is also important to note that the proposed extension will not significantly increase the range of goods that will be sold from the premises. The extension is needed to provide a more spacious sales area to improve the shopping experience, to improve staff welfare facilities, and to improve the servicing facilities.
- 5.28. In light of the above we consider that there are significant qualitative benefits related to the extended Aldi store.

Impact

- 5.29. As set out in PPW, impact assessments are only required for proposals creating over 2,500 sq. m of retail floorspace. Accordingly, an impact assessment is not required.
- 5.30. For robustness however, a basic and proportionate impact assessment has been undertaken.
- 5.31. The nearest centres to the site are as follows:
- Merthyr Tydfil Town Centre
 - Dowlais Local Centre
 - Dowlais (Victoria Street) Local Centre
 - Gurnos Local Centre
 - Brecon Road/Morgantown
 - Cefn Coed Local Centre

Merthyr Tydfil Town Centre

- 5.32. Merthyr Tydfil is the principal town within MTCB of Merthyr Tydfil. It functions as the main commercial, retail and service centre of MTCB and the Heads of the Valleys Region. According to The Merthyr Tydfil Retail and Commercial Leisure Study (2017), produced by Lichfields, states that the principal centre comprises over 257 retail units is located adjacent to the site.
- 5.33. Based on Lichfields' site visit (January 2017) there are 48 vacant commercial units within Merthyr Tydfil's town centre. This represents 18.68% of the total number of units. This amounts to 5,360 sq.m of floorspace. In terms of floorspace the vacant units represent 13.15% of the total commercial floorspace within the centre. Vacant units are dispersed throughout the town centre but there is a pocket of vacant units on Pontmorlais and Upper High Street, reflecting the fact that this area is a fair distance from the primary shopping area.
- 5.34. However, the vacancies are primarily small retail units with 39 of the 48 units being less than 150 sq.m in floorspace.
- 5.35. The centre has a good selection of retail and service uses. In terms of convenience shopping the centre includes a large Tesco Extra (4488 sq.m net), Iceland (364 sq.m net) and Farmfoods (654 sq.m net). The Aldi supermarket lies on the edge of the town centre boundary. These stores are complemented by a number of smaller convenience stores such as Premier Fountain Shop and Bakery (200 sq.m), Trevithick Stores (220 sq.m) and Buy 4 Save Continental Supermarket (230 sq.m).
- 5.36. The main convenience retailers in the centre are a large Tesco Extra, Iceland and Farmfoods. Retail impact is assessed in respect of a centre as a whole, rather than individual sectors or retailers. Due to the size of this centre, and the fact it is performing well, adverse impacts are highly unlikely.

Brecon Road Local Centre

- 5.37. Brecon Road is a small local centre with the commercial units geared towards the needs of local people. There are 21 commercial units within the Brecon Road centre. The only national retailers represented in the centre are SPAR and NISA. This is most probably influenced by the fact that the centre is so close to Merthyr Tydfil's retail centre.
- 5.38. There are three convenience stores within the centre which provide day to day goods to the local community, i.e. Nisa Local (192 sq. m), Spar (178 sq. m) and a Polish convenience shop (143 sq. m). These stores are very small stores which provides daily basic food goods. They do not cater for people undertaking main weekly food shopping trips. Therefore, the proposed development will not impact upon it.

Dowlais (Victoria Street) Local Centre

- 5.39. Dowlais (Victoria Street) Local Centre is made up of approximately 18 commercial units, including Henderson's Premier (128 sq. m), A&A Cunningham Family Butchers (107 sq. m) and Susan's Traditional Fresh Fruit and Veg (68 sq. m). These units cater predominantly for smaller, daily shopping trips, or provide a specialist retail offer, such as the butchers. Aldi does not provide a specialist butchery counter so it will not compete with it.

- 5.40. Furthermore, this centre is approximately 4.1km from the application site. It therefore caters for a different geographical area, and as such it will not lead to any adverse impacts.

Cefn Coed Local Centre

- 5.41. Cefn Coed local centre is a small local centre comprising 17 commercial units. The centre has a good provision of convenience shops comprising Cefn Newsagents & Post Office (69 sq. m), Premier Cefn Convenience Store & Bakery (196 sq. m), and Popty Bach Delicatessens (21 sq. m).
- 5.42. These units cater predominantly for smaller, daily shopping trips, or provide a specialist retail offer, such as the bakery. Aldi does not provide a specialist bakery so it will not compete with it.

Gurnos Local Centre

- 5.43. The centre comprises 12 units and only one of these is vacant. This represents a vacancy rate of 9%. The centre has a good convenience goods offer with four general convenience stores (McColls, Premier, Onestop and Coolfoods) as well as a Greggs bakery. Coolfoods also includes a Post Office branch.
- 5.44. These are small retailers which cater predominantly for smaller top-up shopping trips and are geared towards the needs of local people.

Dowlais Local Centre

- 5.45. The centre comprises seven units, including a convenience unit (Londis & Post Office) which measures 203 sq.m, . This store is a very small store which provides daily basic food goods. It does not cater for people undertaking main weekly food shopping trips. Therefore, the proposed development will not impact upon it.

Conclusion

- 5.46. In light of the above, the nearest defined centres are performing well and are therefore resilient to new retail floorspace being developed in edge of centre locations.
- 5.47. Notwithstanding the above, the proposal aims to provide an improved foodstore at an established retail destination, rather than significantly increasing the range of goods that can be sold or attracting a large number of new customers.
- 5.48. Given that the proposal is an extension rather than an entirely new store, it will not necessarily divert trade from existing retail floorspace. Furthermore, any trade that is diverted from existing floorspace will be from stores that are of similar scale and format.
- 5.49. The nearest stores that are of a similar scale and format are Farmfoods, Co-op (Pentrebach, and Lidl (Penygarnddu Industrial Estate). These stores are in out of centre locations, so do not benefit from any policy protection. The majority of any trade diverted will be from these three stores.
- 5.50. There may also be some diversion from existing Aldi stores at The Walk, Ebbw Vale and New Road, Tir-y-Berth. The improvement of the store at the application site may mean that some customers switch stores from The Walk, Ebbw Vale and New Road, Tir-y-Berth following the improvements made to the shopping experience at the application site. These other two sites are larger and more modern and so the experience for shoppers is preferable over older, poorly configured stores. Furthermore, the improved store will help to claw back leakage of expenditure to other Aldi stores which are larger and not within Merthyr Tydfil County.
- 5.51. Overall, we consider that the proposed extension will not lead to any significant adverse impacts on defined retail centres. Any impact on existing facilities will be on stores located in out of centre locations, and those levels will be low in any event given the nature of the proposal.
- 5.52. On this basis, it is considered that the modest extension of the store is in accordance with Policies SW4, EcW3, EcW5 and EcW6 of the Local Plan and PPW (2021).

Sequential Test

- 5.53. As set out above, it is clear that the application site is an established Class A1 retail (food) destination. However, it is acknowledged nonetheless that the application site is not situated within a designated retail centre and is out of centre in retail policy terms.

- 5.54. Policy AS18 (Retail hierarchy) states that Merthyr Tydfil Town Centre is the favoured location for retail development, being situated at the head of a retail hierarchy. Outside the defined centres, proposals will be subject to an assessment of need and a strict application of the sequential test. Proposals will then only be permitted where they avoid causing harm to town/local centre vitality and viability.
- 5.55. Paragraph 4.3.18 states that the Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. In implementing this policy, planning authorities should adopt a sequential approach to the selection of new sites in their development plan and when determining planning applications for retail.
- 5.56. Paragraph 5.286 of the Local Plan sets out the sequential assessment process:
- 'The sequential test as detailed in PPW aims to direct retail developments to existing centres wherever possible or to the edges of such centres if sites within the centres are not available. Only where need for additional retail floorspace has been demonstrated and there are no locations in or adjacent to designated centres that could accommodate that need, should out-of centre locations be considered.'*
- 5.57. The purpose of the proposed extension is to improve the operation of the store for existing customers, not to significantly increase the existing product range or customer base, and thus not generate significant additional traffic movements to the site.
- 5.58. The proposals represent a modest 413 sq. m increase in gross internal floorspace. Accommodating the proposed floorspace on any other site would not achieve the same benefits as allowing an extension of the existing store. It is not possible to disaggregate the proposed floorspace from the existing store – both elements must be together to function correctly. For example, it would not be possible to create a new Aldi store on another site with just 413 sq. m. of floorspace.
- 5.59. The application site is well placed to complement existing retail uses, and facilitate linked trips between the Aldi foodstore and the town centre including the large Tesco Extra. Furthermore, the site is located in close proximity to residential properties allowing for walk in customers, as well as by public transport and cycling.
- 5.60. Following a search of the Merthyr Tydfil Town Centre, Dowlais Local Centre, Gurnos Green Local Centre, Brecon Road/Morgantown, and Cefn Coed Local Centre there are considered to be no sites or vacant units that are suitable and available for the development proposed.
- 5.61. On this basis, it is considered that the modest extension of the store is in accordance with Policies SW4, EcW3, EcW5 and EcW6 of the Local Plan and PPW (2021).

Trees and Soft Landscaping

- 5.62. An Arboricultural Impact Assessment (AIA) and Soft Landscaping Plan have been produced by Tyler Grange to provide details relating to Arboriculture and landscaping.
- 5.63. The AIA assesses the impact of the proposals on the existing surveyed tree stock and is informed by a baseline BS5837:2012 Tree Quality Survey of the site.
- 5.64. The tree survey identified one tree and two groups of trees which are of moderate value (Category B) and seven trees and one tree group of low value (Category C). No trees onsite are subject to a Tree Preservation Order, Conservation Area or Ancient Woodland designation and no ancient or veteran trees were identified during the survey.
- 5.65. The site's tree cover is relatively typical of an urban setting and comprises trees within hard landscaping surrounding a car park. The tree stock is of low to moderate value with visible defects which provided evidence that several of the trees were not establishing well within their current setting and planting conditions.
- 5.66. The retained tree stock on the outskirts of the car park (T5-T7) will be protected through the implementation of the Arboricultural Method Statement in accordance with BS5837 to ensure the longevity of these trees.
- 5.67. T1, T2, T3, T4 and G1 are proposed to be removed to facilitate the extension of the car parking area. Loss of this vegetation will be compensated for by the provision of new tree and shrub planting within the soft landscape scheme to form a diverse GI network within the site, in line with Policy EnW1 relevant to enhancing biodiversity interests. This includes the provision of 4 extra heavy standard trees, 3 large specimen shrubs and 514 new shrubs within large planting beds that allow space for the trees to establish and hit full maturity.

- 5.68. With the implementation of the new tree and shrub planting as part of the development's soft landscaping scheme, this will result in a net gain in tree cover of improved diversity to that of the current scenario.
- 5.69. Given the limited extent of removal of low to moderate value vegetation and the opportunity for new tree and shrub planting within ample space, a net-gain in vegetation cover will likely be achieved through the development.
- 5.70. The proposals are therefore considered to accord with local and national planning policy as it relates to trees and landscaping. On this basis, it is considered that the modest extension of the store is in accordance with Policy EnW1 relevant to enhancing biodiversity interests and PPW (2021).

Highways and Parking

- 5.71. A Transport Statement (TA) has been produced by Entran Ltd. to provide details relating to highways matters associated with the proposed extension to Aldi's existing food store and car park. The findings of this note are set out below.
- 5.72. There will be an increase in car parking numbers from 81 to 82, which includes four EVCPs and two click & collect bays. Aldi as the store operator has monitored use of the car park over the last few years and identified that the car park during the busiest periods is operating within capacity (see Appendix B) and even with the expected increase in traffic will remain operating within capacity.
- 5.73. On this basis, and with the predicted increase in customer dwell time it is considered that the modest increase in parking will assist in making the car park operational more efficient and will:
- Meet current and future customer demand
 - Avoid displaced parking
 - Reduce internal re-circulation
 - Ensure the effective and safe operation of the car park
- 5.74. In regard to trips, TRICS data has been used to establish trip rates and is attached as Appendix D of the TA. However, TRICS is primarily for new build and not extensions. Aldi has extensive data relating to store extensions that show a 50% increase in store size relates to less than 20% increase in customer volumes passing through the tills. What an extension does is to primarily increase customer dwell time. Based on Aldi experience, Entran see no reason why this type of growth in trading might not be witnessed here.
- 5.75. Based on the above, revised vehicle trips are considered to be 76 daily (38 arrivals and 38 departures). At peak times (0800-0900 and 1700 – 1800) the trips are considered to be 6 respectively.
- 5.76. Such a marginal increase in traffic will clearly have an imperceptible impact on the local highway network and in this regard further analysis is considered unnecessary.
- 5.77. Due to the modest nature of the proposal, the development will not result in an intensification of traffic at and surrounding the site. The proposed extension is required to optimise existing customer experience and store efficiency.
- 5.78. The proposals do not alter the vehicle and transport links into the site, or customer car parking at the site.
- 5.79. The site is in a sustainable location that delivers a high level of multi-modal transport. This actively encourages a reduction both in the need to travel, and in particular the need to travel by car.
- 5.80. The proposed development is considered to be consistent with relevant planning policy, with the site access maintaining safe and efficient access for all modes of transport. On the basis of the above, it is considered that the development proposals are not expected to lead to any localised material off-site highways issues on the adjacent transportation network.
- 5.81. On this basis, it is considered that the modest extension of the store is in accordance with Policy SW12 of the Local Plan and PPW (2021).

Flooding and Drainage

- 5.82. A Flood Consequences Statement & Drainage Strategy has been produced by Craddys to provide details relating to flooding and drainage. The findings of this document are set out below.

Flood Consequences Statement

- 5.83. The Flood Consequences Statement The proposed development is considered to meet the requirements of the TAN15 justification test and is therefore appropriate in this location. The site lies within a Flood Warning Area and the store should be subscribed to this service.

Aldi Store Surface Water Drainage Strategy

- 5.84. Following the implementation of Schedule 3 of the Flood Water Management Act 2010 in Wales, developments with a construction area greater than 100m² are required to incorporate Sustainable Drainage Systems (SuDS). All such systems are required to be approved by the SuDS Approval Body (SAB) under an approval application, and required to be adopted by the SAB where they serve more than a single property. As such, surface water drainage for the proposed Aldi site will be developed and approved under application separate to the planning process.

Aldi Store Foul Water Drainage Strategy

- 5.85. Minor modifications will be required to the existing foul water system that serves the Aldi store to suit the proposed extension. The design of the private foul drainage will be developed in accordance with Building Regulations Approved Document H and Welsh Ministers Standards.

Ownership and Maintenance

- 5.86. All the Aldi private foul and surface water drainage will be maintained by Aldi Stores Ltd. Specific maintenance requirements for the new Aldi surface water drainage system (including SuDS) will be agreed with the SAB.
- 5.87. On this basis, it is considered that the modest extension of the store is in accordance with Policy EnW4 of the Local Plan and PPW (2021).

Ecology

- 5.88. An Ecological Assessment has been produced by Tyler Grange to provide details relating to Ecology. The findings of this assessment are set out below.
- 5.89. The site is not covered by any sites that are the subject of statutory or non-statutory protection, however the Afon Taf SINC lies directly adjacent. Stringent pollution control measures will be put in place to ensure no impacts to the designated site occur as a result of the development.
- 5.90. There is one European designated sites and one nationally designated site within the study area however, due to the scale and nature of the proposals, it is not considered that there would be a detrimental impact upon these designated sites.
- 5.91. Habitats on site offer limited opportunities for protected species to be present. The buildings were assessed as being of negligible potential to support roosting bats.
- 5.92. The Assessment concludes that no ecological issues that could affect the principle of development of the site have been identified.
- 5.93. The following mitigation and enhancement measures are proposed:
- Should work commence during the breeding bird season, a check should be made by a Suitably Qualified Ecologist to assess if there is an active nest within any of the trees to be removed;
 - Additional planting within the ornamental areas;
 - Avoidance of lighting along the river corridor;
 - Provision of two bat boxes on retained trees; and
 - Provision of two bird boxes on retained trees.
- 5.94. It is not considered that the proposals will have a significant detrimental impact upon biodiversity and, providing the advice stated within this report is adopted, then it is considered that the proposed works will not trigger current legislation and will be in conformity of both local and national planning policy.

Layout and Access

- 5.95. A realignment of the site and car park is required to facilitate the proposed development. The total parking spaces increases from 81 to 82. The building entrance position, orientation, and relationship with the rest of the site remains similar. The retail area extends into the new extension space.
- 5.96. As part of the development proposals, the service yard is not affected. The existing site entrance and exit off of High Street is to be maintained, providing access to the store for vehicles, pedestrians, and cyclists.
- 5.97. On this basis, it is considered that the modest extension of the store is in accordance with Policy SW11 of the Local Plan and PPW (2021).

Design

- 5.98. The proposed extension is designed to match the existing character and will therefore consist of the same form and materials as the current Aldi store.
- 5.99. Paragraph 3.3 of PPW states that *'good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places'*.
- 5.100. Policy SW11 of the Local Plan ensures that good quality design will be sought in all forms of development. The Local Plan states that development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design
- 5.101. The proposed extension is designed to match the existing character and will therefore consist of the same form and materials as the existing Aldi store.
- 5.102. The design of the proposed extension does not fundamentally alter the architectural style of the building.
- 5.103. The proposed extension is a continuation of the scale and form of the existing building and will match the character of the rest of the store. The new extension will be a continuation of the brickwork pillar in between white render facades as seen on the existing building. An element of the existing roof will be extended in matching materials to align with the existing.
- 5.104. Careful consideration has been given to the scale and massing of the proposed extension in relation to the existing site layout, which has been informed by the sites context and existing features. The operational and servicing requirements of the store were also an important factor informing the final design of the proposed extension.
- 5.105. On this basis, it is considered that the modest extension of the store is in accordance with Policy SW11 of the Local Plan and PPW (2021).

Ground Conditions

- 5.106. A Ground Report has been produced by TerraFirma to provide details relating to ground conditions. Details of which can be found in the report titled 'TerraFirma Ground Report' that has been submitted with this application.
- 5.107. On this basis, it is considered that the modest extension of the store is in accordance with Policy EnW4 of the Local Plan and PPW (2021).

Sustainability

- 5.108. High quality design is integral to the scheme's design. This informs the specification and detailing of materials, to provide a robust and energy efficient building fabric for both the extension and the existing building. Wherever possible, materials required for construction will be procured locally.
- 5.109. The improvements to the building entrance and extension of the existing glazed entrance canopy will improve natural daylighting and reduce the internal electrical lighting loads.
- 5.110. On this basis, it is considered that the modest extension of the store is in accordance with Policy EcW8 of the Local Plan.

6. Summary and Conclusions

- 6.1. Planning Potential, on behalf of Aldi Stores Ltd (Aldi), submits this Planning Statement in support of a full planning application for the extension (413 sqm) to the existing Class A1 Aldi foodstore and car park at Plymouth Street, Merthyr Tydfil.
- 6.2. The application proposes the demolition of the existing car sales building (17 sqm), boundary wall, and forecourt to facilitate an extension to the store building, an extension and re-configuration of the existing car park, together with elevational alterations and other external works.
- 6.3. The proposal will result in an additional 413 sqm of gross floor area, and 392 sqm of net additional retail floorspace. The car parking numbers will increase from 81 to 82, and the car park will be extended and reconfigured.
- 6.4. The proposed new tree planting and landscaping around the site boundaries will substantially enhance the amenity of the site and mitigate for the loss of the trees on site, and improve the street scene and public realm along High Street.
- 6.5. This Statement addresses all of the relevant planning policy considerations associated with the proposed development, but should be read in conjunction with other documents and drawings submitted in support of this application.

Conclusions

- 6.6. The scale of the proposed extension (413 sqm) falls below the threshold for (retail) impact assessments in Wales as defined by PPW 11 (2021) and TAN 4.
- 6.7. On the basis and the fact that the works are minor, and that the extension is significantly below the nationally set threshold, a full retail impact assessment is not required and has not been undertaken in this instance.
- 6.8. Accommodating the store in the town centre would not achieve the same benefits as allowing a modest extension of the existing store, to improve the overall efficiency and operation of the store.
- 6.9. The design of the proposed extension does not fundamentally alter the architectural style of the building. The retail area is proposed to extend into the new single storey extension.
- 6.10. The proposed extension is unlikely to increase customer numbers at the store. Moreover, it will seek to improve the retail offer and experience for existing customers, to meet their ever-changing demands. Therefore, traffic levels will not intensify at or surrounding the site. In addition, the modest increase in retail sales area unlikely to require additional deliveries at the store.
- 6.11. On the basis of the consideration of the proposals set out in this Statement (and other supporting documents), we consider that the application proposals represent appropriate development and comply with relevant planning policy at all levels.
- 6.12. We therefore consider that when assessed against relevant planning policy, the application should be granted permission.