

PLANNING STATEMENT

**Land at Dragon Park,
Abercanaid**

February 2023



Summary

Proposal:

Full Planning Application relating to residential development of 200 homes, engineering works, access formation, landscape, drainage and associated works

Location:

Land at Dragon Park, Abercanaid, Merthyr Tydfil

Date:

December 2022

Project Reference:

19.170

Client:

Davies Homes

Product of:

Asbri Planning Limited
Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff CF23 8RS

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Introduction

- 1.1 This Planning Statement accompanies the Full Planning Application relating to residential development of 200 homes, engineering works, access formation, landscape, drainage and associated works at Land at Dragon Park, Abercanaid, Merthyr Tydfil.
- 1.2 The site has been vacant for a number of years following the demolition of the former Ardagh factory.
- 1.3 The following application plans/drawings are submitted:

Drawing name	Drawing reference
Site Location Plan*	SL-01
Planning Layout*	PL-01 Rev 11
External Layout (1 of 2)	21566-C-002-C
External Layout (2 of 2)	21566-C-003-C
Drainage Strategy (1 of 5)	21566-C-011-C
Drainage Strategy (2 of 5)	21566-C-012-C
Drainage Strategy (3 of 5)	21566-C-013-C
Drainage Strategy (4 of 5)	21566-C-014-C
Drainage Strategy (5 of 5)	21566-C-015-C
Landscape, Biodiversity & Amenity Strategy*	577.01 Rev B
Affordable Homes Plan	AFH-01 Rev A
External Work Layout*	EW-02 Rev A
House Finishes Plan	HF-01 Rev A
Open Space Plan	OSP-01 Rev A
Parking Strategy Plan	PS-01 Rev A
Storey Heights Plan	SH-01 Rev A
Refuse Strategy Plan	RS-01 Rev A
Close Board Fence	2124-D02
Close Board Gate	2124-D03
External Details Stack Bond Screenwall	2124-D05
External Details Hit & Miss Flemish Bond Screenwall	2124-D06
External Details Low Brick Screenwall	2124-D07
Ascot House Type	ASC-01
Canterbury House Type	CAN-01
Chepstow House Type Detached AS Handing	CHE-01
Chepstow House Type Detached Opposite Handing	CHE-02
Chepstow-Rockfield House Type Semi Pair	CHE-ROC-01

Cottage House Type As Handing	COT-01
Cottage House Type Opposite Handing	COT-02
Harrowgate House Type As Handing	HAR-01
Harrowgate House Type Opposite Handing	HAR-02
Hereford House Type As Handing	HER-01
Hereford House Type Opposite Handing	HER-02
Knightsbridge House Type As Handing	KNI-01
Knightsbridge House Type As Handing – Special	KNI-02
Lynton House Type As Handing	LYN-01
Lynton House Type Opposite Handing	LYN-02
Lynton House Type As Handing Special	LYN-03
Radleigh House Type As Handing	RAD-01
Radleigh House Type Opposite Handing	RAD-02
Radleigh House Type Opposite Handing Special	RAD-03
Raglan House Type	RAG-01
Raglan House Type Terrace	RAG-02
Rockfield House Type As Handing	ROC-01
Rockfield House Type Opposite Handing	ROC-02
Rockfield-Cottage House Type Pair	ROC-COT-01
Warwick Housetype	WAR-01
Warwick House Type Terrace	WAR-02
Windermere House Type Detached As Handing	WIN-01
Windermere House Type Detached Opposite Handing	WIN-02
Windermere House Type	WIN-03
1 Bed Affordable Flat	211-AF-01
2 Bed 4 Person Affordable House Semi Detached	421-AF-01
2 Bed 4 Person Affordable House Terraced	421-AF-02
1 Bed Apartment Building Ground, First & Second Floor Plans	APT-01
1 Bed Apartment Building Elevations	APT-02
Street Scenes SS-01 Sheet 2 of 7	SS-01
Street Scenes SS-02 Sheet 2 of 7	SS-02

- 1.4 The following supporting documents are submitted alongside the Planning Application:

Document Name	Prepared By
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Planning Application Forms	Asbri Planning
Design and Access Statement	Hammonds
Planning Statement	Asbri Planning
PAC Report	Asbri Planning
CIL Form	Asbri Planning
FCA	JBA
Drainage Strategy Statement	Quad Consult
Noise Impact Assessment	Acoustic Consultants
Tree Report	ArbTS
Transport Assessment	Lime Transport
Ecological Site Summary	Alder Ecology
Geoenvironmental Desk Study Report February 2016	Integral Geotechnique
Site Investigation Report April 2019	Integral Geotechnique
Geoenvironmental Site Investigation Report December 2021	Integral Geotechnique
CMRA February 2016	Integral Geotechnique
CMRA November 2021	Integral Geotechnique
Additional Land Parcel Desk Study November 2022	Integral Geotechnique
Additional Land Parcel Coal Mining Risk Assessment December 2022	Integral Geotechnique

- 1.5 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:
- **Section 2:** provides a description of the site and its surroundings, including a review of the site's Planning History.
 - **Section 3:** summarises the development proposals.
 - **Section 4:** provides an overview of pre-application dialogue undertaken in regard to the emerging scheme.
 - **Section 5:** outlines the relevant planning policy context, at both the national and local level.
 - **Section 6:** addresses the key planning considerations associated with the development proposal.
 - **Section 7:** provides a conclusion regarding the overall acceptability of the application.

Site Description

The Site & Surroundings

General Location

- 2.1 The application site is located within Abercanaid which is a small village in the Welsh county borough of Merthyr Tydfil. It is situated 2.5 miles south of Merthyr town centre, west of Pentrebach, across the River Taff and north of Troedyrhiw. The site itself is located within industrial area Dragon Parc which is to the north of the main body of housing in Abercanaid. The A470 runs to the west of the site with the River Taff running directly to the east. The site is centred on grid coordinates E: 305444, N: 204276.

Site Features

- 2.2 The application site is located at the former industrial site within Dragon Parc industrial area. The site is of an irregular shape and comprised predominantly of hardstanding following the demolition of buildings within the site. The outer perimeters of the site are generally wooded. The site also contains areas of scrub, neutral grassland, marshy grassland and Japanese knotweed. The site is largely flat in nature with the level raising to the west and south western boundary whilst dropping to the south eastern corner.
- 2.3 A planning permission was granted ref. P/20/0025 for engineering works including the provision of a drainage channel/swale and culvert/outflow, raising of the site levels and creation of a site access on the 19th November 2020. The reason for the application was to channel flood water through the site allowing the majority of the development plateau to be removed from flood zone C2 as defined by the NRW development advice maps. The site levels and drainage channel works have taken place therefore form a feature of the current site circumstances.
- 2.4 To the north the site is bound by an industrial use with associated car park. To the west the site is bound by a combination of an industrial building alongside a highway which follows round to the southern boundary. To the east the site is bound by the river Taff. The surrounding context is mixed given the site is within Dragon Parc where there are a number of industrial and light industrial uses alongside residential uses within Abercanaid to the south and west.
- 2.5 A review of the NRW flood maps identifies the site is predominantly located within flood zone C2 as such is without significant flood defence infrastructure with a section within flood zone B areas known to have flood in the past. As alluded to above a recent planning application has been implemented removing the majority of the site

from flood zone C2. This has been updated with a successful flood map challenge which can be seen on the new flood map for planning. The map demonstrates the flood channel is within flood zone 3 whilst the site plateau is zone 1 and partly zone 2.

- 2.6 A review of the historic Wales maps identifies there are no listed building within the site boundary. The nearest listed buildings are a collection of Grade II listed buildings at Quay Row.
- 2.7 A review of the coal authority maps identifies the application site is located within a coal mining report area.
- 2.8 A review of the replacement LDP demonstrates the site is located within the Settlement Boundary and is within the Hoover Strategic Regeneration Area as defined by LDP Policies SW6. The site is also within a heat priority area as defined by policy EcW9. The River Taf to the eastern boundary is a SINC.

Access

- 2.9 The site as existing has two vehicular access points to the northern boundary and southern boundary. To the north the access point is following an access road into Dragon Parc and to the south the access is directly off the roundabout along Stanfield Close. These also act as the pedestrian access points into the site.
- 2.10 The nearest bus stops to the site are located along the highway adjoining the western boundary. The Taff Trail also runs to the west of the site. The nearest train station is Pentre-Bach located approximately 470m to the south east.

Planning History

- 2.11 The following planning application are relevant to the proposal:
- P/16/0039 - Demolition of former Hoover / Candy office block and footbridge—prior notification not required; and
 - P/17/0144 - Residential and business (Use Class B1) development—undecided
 - P/20/0025 for engineering works including the provision of a drainage channel/swale and culvert/outflow, raising of the site levels and creation of a site access

Development Proposals

- 3.1 The proposals comprise a Full Planning Application relating to residential development of 200 homes, engineering works, access formation, landscape, drainage and associated works. The architectural plans have been developed by Hammond Architectural.

Site Layout, Scale and Appearance

- 3.2 The site layout demonstrates the housing will be located in clusters off a central highway that runs the length of the site from north to south. Properties are situated centrally to the site with a green corridor which runs around the site boundaries supporting the existing green infrastructure present.

- 3.3 The proposal includes a wide mix of house types to create a distinct character within the site in the following mixes:

- 18 no. 1 bed apartments;
- 4 no. 1 bed walk up flats;
- 2 no. flat over garages;
- 20 no. 2 bed houses;
- 103 no. 3 bed houses;
- 47 no. 4 bed houses;
- 6 no. 5 bed houses

- 3.4 The homes are 3 storeys at their tallest within prominent corner locations.

- 3.5 The architectural detailing and material palette of the proposed scheme will be carefully considered to ensure attractive, legible frontages are created.

- 3.6 Key frontages will be strengthened through variation in built form, massing, architectural detailing and landscape treatment.

- 3.7 The DAS provides a full overview of design proposals.

Landscape

- 3.8 The landscape strategy for the site develops on the existing green boundaries and includes key features such as:

- A central park which will have opportunities for doorstep play;
- A riverside trail;
- Planted SuDS;

- A SuDS storage basin within the southern section of the site this will be sunk to permanently hold water;
- Southern Gateway to include:
 - rain gardens at key corner location planted to provide welcoming entrance
 - SUDS and planting provide treatment from proposed improved road
 - mix of tree, hedge and wildflower grassland provides diversity of habitats
- woodland edge native planting proposed at base of existing boundary trees and vegetation;
- corridor softens views of the development from the west, and improves connectivity for bats and other wildlife species

Planning Policy Context

Introduction

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:
- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
 - Merthyr Tydfil Replacement Local Development Plan (RLDP) was adopted on 29th January 2020
- 4.2 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:
- Planning Policy Wales Edition 11 (February, 2021), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
 - Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
 - Merthyr Council Supplementary Planning Guidance.
- 4.3 This section of the Planning Statement provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this application. For ease of reference, this overview is set out below at the national and local level.

National Level

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

- 4.4 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.

- 4.5 Within the Act, sustainable development is defined as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

National Development Framework: Future Wales – The National Plan 2040

- 4.6 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. As stated above, the National Development Framework has Development Plan status.
- 4.7 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time, as follows:

A Wales where people live:

- 1. ...and work in connected, inclusive and healthy places*
- 2. ...in vibrant rural places with access to homes, jobs and services*
- 3. ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth*
- 4. ...in places with a thriving Welsh Language*
- 5. ...and work in towns and cities which are a focus and springboard for sustainable growth*
- 6. ...in places where prosperity, innovation and culture are promoted*
- 7. ...in places where travel is sustainable*
- 8. ...in places with world-class digital infrastructure*
- 9. ...in places that sustainably manage their natural resources and reduce pollution*
- 10. ...in places with biodiverse, resilient and connected ecosystems*
- 11. ...in places which are decarbonised and climate-resilient*

Growth Strategy

- 4.8 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

Policy 1 – Where Wales will Grow

The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- *Cardiff, Newport and the Valleys*
- *Swansea Bay and Llanelli*
- *Wrexham and Deeside*

- 4.9 It is further explained that *"Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources"* (page 60).

- 4.10 The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows:
"Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being" (page 60).

Placemaking

- 4.11 Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales

that “Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration”.

- 4.12 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*
- *integrating green infrastructure, informed by the planning authority’s Green Infrastructure Assessment.*

- 4.13 Further detail on the Welsh Government’s strategic placemaking priorities is set out at Page 66 of Future Wales. Key placemaking principles are summarised below:

Mix of uses

To create activity throughout the day and enable people to walk and cycle, rather than being reliant on travelling by car, places should have a rich mix of residential, commercial and community uses within close proximity to each other. Urban growth and regeneration should integrate different uses within neighbourhoods.

Variety of housing

To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater

for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.

Walkable scale

To enable active and healthy lives, people should be able to easily walk to local facilities and public transport. Urban growth and regeneration should be focused within inner city areas and around town centres, as well as around mixed use local centres and public transport. Co-working hubs offering an alternative to home-working are an important feature of the economy, and these should be located in town and local centres.

Density

To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. It may be necessary to take social distancing requirements into consideration when designing public and communal spaces.

Street network

To provide a framework for different uses and types of housing to be integrated within neighbourhoods, urban growth and regeneration should be based on a network of streets that enable social distancing if necessary. The street network should be permeable, with streets primarily connecting at both ends with other streets and providing links into, out of, and through places. The street network should have a hierarchy, with streets that have different characters and functions.

Plot-based development

To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and local builders, urban growth and regeneration should provide opportunities for the development of small plots. A plot-based approach to development should be promoted, including the subdivision of larger sites to be built in small plots or as a group of plots.

Green infrastructure

To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration. Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated.

Housing

- 4.14 It is stated at Page 73 of Future Wales that *“the planning system has a long-established role in the delivery of affordable housing. We are committed to ensuring that new housing meets the needs of all members of society especially those unable to afford to buy on the open market. Echoing the strategic placemaking principles in policy 2, sustainable places are inclusive and welcoming to all; they do not exclude sections of the community or create ghettos of the affluent and the poor”*.
- 4.15 Policy 7 is of key relevance in regard to the delivery of affordable housing, which states the following:

Policy 7 – Delivering Affordable Homes

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

Biodiversity and Green Infrastructure

- 4.16 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires *“an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable”* (page 76).
- 4.17 In addition, the associated importance of green infrastructure is highlighted: *“As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being”* (page 78).
- 4.18 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

Policy 9 – Resilient Ecological Networks and Green Infrastructure

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.*

Transport

- 4.19 Future Wales identifies that transport in Wales is currently dominated by the car and that *“our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people’s everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people’s health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation” (page 85).*
- 4.20 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *“to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel” (page 85).*

Planning Policy Wales Edition 11

- 4.21 Planning Policy Wales (PPW) Edition 11 was published on 24th February 2021. 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.
- 4.22 Sustainable Development is defined at Page 7 of PPW as follows: *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.*

- 4.23 Paragraph 1.18 sets out that *“Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated”*.

Placemaking

- 4.24 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example states that *“Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities”*.
- 4.25 It is summarised succinctly at Paragraph 2.3 that *“The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all”*.
- 4.26 Placemaking is defined at Page 14 of PPW as follows: *“Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well being in the widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings”*.
- 4.27 A set of ‘national sustainable placemaking outcomes’ are outlined within PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:
- *Creating and Sustaining Communities*
 - *Enables the Welsh language to thrive*
 - *Appropriate development densities*
 - *Homes and jobs to meet society’s needs*
 - *A mix of uses*
 - *Offers cultural experiences*
 - *Community based facilities and services*
 - *Making Best Use of Resources*
 - *Makes best use of natural resources*
 - *Prevents waste*
 - *Prioritises the use of previously developed land and existing buildings*

- *Unlocks potential and regenerates*
- *High quality and built to last*
- *Maximising Environmental Protection and Limiting Environmental Impact*
 - *Resilient biodiversity and ecosystems*
 - *Distinctive and special landscapes*
 - *Integrated green infrastructure*
 - *Appropriate soundscapes*
 - *Reduces environmental risks*
 - *Manages water resources naturally*
 - *Clean air*
 - *Reduces overall pollution*
 - *Resilient to climate change*
 - *Distinctive and special historic environments*
- *Growing Our Economy in a Sustainable Manner*
 - *Fosters economic activity*
 - *Enables easy communication*
 - *Generates its own renewable energy*
 - *Vibrant and dynamic*
 - *Adaptive to change*
 - *Embraces smart and innovative technology*
- *Facilitating Accessible and Healthy Environments*
 - *Accessible and high quality green space*
 - *Accessible by means of active travel and public transport*
 - *Not car dependent*
 - *Minimises the need to travel*
 - *Provides equality of access*
 - *Feels safe and inclusive*
 - *Supports a diverse population*
 - *Good connections*
 - *Convenient access to goods and services*

4.28 It is highlighted at Paragraph 2.20 that *“Not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being”*.

4.29 The implications of COVID are highlighted in PPW 11 with Paragraph 2.22 stating for example that *“We must ensure that a post-Covid world has people’s well-being at its heart. Planning Policy Wales leads the*

way in this respect and contains the principles and policies needed for us to recover from this situation in a positive manner”.

Good Design

- 4.30 The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW where it is stated 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. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area”.*

Sustainable Transport

- 4.31 PPW advises at Paragraph 4.1.10 that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:
- *“are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
 - *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
 - *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling”.*
- 4.32 Paragraph 4.1.11 summarises that: *“Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services”.*

Active Travel

- 4.33 The importance of developing local active travel networks to help mitigate the impact of new development by providing an alternative mode of travel to the private car is highlighted in PPW. It is stated at Paragraph 4.1.30 that *“Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice”.*

Public Transport

- 4.34 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this *“by locating development where there is, or can be, good access by public transport”*.

Housing

- 4.35 It is set out at Paragraph 4.2.1 that *“New housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities”*.
- 4.36 It is highlighted within PPW that a community’s need for affordable housing *“is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications”* (Paragraph 4.2.25).

Green Infrastructure

- 4.37 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.5 that *“The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places”*.

Sustainable Drainage Systems (SuDS)

- 4.38 The importance of considering SuDs as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *“The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development”*. It is advised at Paragraph 6.6.19 that *“Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified”*.

Technical Advice Notes

- 4.39 The following Technical Advice Notes (TANS) are of relevance to the development proposal.
- 4.40 TAN 2 Planning and Affordable Housing (2006): outlines the general concept of affordable housing as being: *“the ability of households or potential households to purchase or rent property that satisfies the needs of the household without subsidy”*. The guidance requires local planning authorities to: *“include an affordable housing target in the development plan which is based on the housing need identified in the*

local housing market assessment, indicate how the target will be achieved using identified policy approaches and monitor the provision of affordable housing against the target and where necessary take action to ensure that the target is met”.

- 4.41 TAN 5 Nature Conservation and Planning (2009): provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.
- 4.42 TAN 11 Noise (1997): provides advice on how the planning system can be used to minimise impact of noise without placing unreasonable restrictions on development. It outlines some of the main considerations which local planning authorities should take into account in drawing up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.
- 4.43 TAN 12 Design (2016): provides advice on design considerations and states that development should aim to:
- *Create places with the needs of people in mind, which are distinctive and respect local character*
 - *Promote layouts and design features which encourage community safety and accessibility*
 - *Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles*
 - *Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building*
 - *Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards*
 - *Secures the most efficient use of land including appropriate densities*
 - *Consider and balance potential conflicts between these criteria*
- 4.44 TAN 18 Transport (2007) confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.

Local Level

Merthyr Replacement Location Local Development Plan 2016 - 2031

- 4.45 The Merthyr Council Replacement Local Development Plan (RLDP) was adopted on 29th January 2020 and is the prevailing development plan for Merthyr Tydfil. The site is located within the Settlement Boundary and is within the Hoover Strategic Regeneration Area as defined by LDP Policies SW6. The site is also within a heat priority area as defined by policy EcW9. The River Taf to the eastern boundary is a SINC.
- 4.46 The LDP Constraints Map shows the flood risk at the site in accordance with TAN:15 development advice maps.
- 4.47 The following LDP policies are of relevance in the determination of the Planning Application.

Policy Reference	Relating to
SW1	Provision of New Homes
SW2	Provision of Affordable Housing
SW3	Sustainably Distributing New Homes
SW4	Settlement Boundaries
SW6	Hoover Strategic Regeneration Area
SW9	Planning Obligations
SW11	Sustainable Design and Placemaking
CW1	Historic Environment
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
EcW9	District Heating

Supplementary Planning Guidance

- 4.48 The following Supplementary Planning Guidance (SPG) adopted by Merthyr Tydfil Council is of relevance to the proposed development:
- Guidance Note. 1 Affordable Housing
 - Guidance Note. 2 Planning Obligations
 - Guidance no. 5 Nature and Development

Appraisal

Overview

- 5.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.
- 5.2 The key material considerations of relevance in the determination of the application are as follows:
- The principle of development
 - Delivery of placemaking principles
 - Transport
 - Ecology and biodiversity
 - Flooding
 - Noise
 - Other Material Planning Considerations
 - Land Contamination

The Principle of Development

- 5.3 The application site is brownfield land located within the settlement boundary. PPW11 advocates that in settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.
- 5.4 The site is identified being within the Regeneration Site ref. Hoover Strategic Regeneration Area, Policy SW:6 is therefore relevant. The policy states that the Hoover Strategic Regeneration Area is identified to facilitate a major mixed-use development comprising 440 new homes.
- 5.5 The proposal will make efficient reuse of a disused brownfield parcel of land and is inline with RLDP policy SW6 (Hoover Strategic Regeneration Area) by providing new homes in the Hoover Regeneration Area.

Delivery of Placemaking Principles

- 5.6 The proposals have been developed by Hammond Architects who have aimed to meet the placemaking principles set out and advocated for by Future Wales, Planning Policy Wales and local level planning policy. Policy SW6 makes reference to a number of sustainable placemaking design principles that development

proposals in the Hoover Area should meet. The principles will be discussed below.

- 5.7 The proposals will provide a legible network of foot and cycle paths promoting active travel. This includes the riverside trail which links the site north to south and east to west centrally providing links to the Taff Trail which sits to the west of the site. The routes will also act as recreational opportunities with areas for play and way markers throughout the footpath routes.
- 5.8 The scheme includes a range of dwelling types to satisfy local needs, while also delivering the plan strategy to develop a new sustainable mixed-use community. The architects have been working closely with Davies Homes, the LPA and the housing team to ensure that houses provided are in line with current demand.
- 5.9 The proposals aim to deliver distinctive character areas which create a sense of place. This includes different character areas within the site which will adopt varied use of materials dependent on the areas location. The DAS provides a section on the History of the site which has been acknowledged in developing the design.
- 5.10 The proposals will significantly contribute towards Green Infrastructure by improving the existing boundaries and creating a number of interlinked green spaces throughout the site. This includes:
- A central park which will have opportunities for doorstep play;
 - A riverside trail;
 - Planted SuDS; and
 - A SuDS storage basin within the southern section of the site this will be sunk to permanently hold water
- 5.11 The River Taf will be a key feature within the development as noted above with the riverside trail. This is a key placemaking principle of policy SW6 which states *"incorporate the River Taff as a distinctive feature and use the river corridor as a green spine that filters into the development, opening up the riverside and creating an accessible and pedestrian-friendly movement corridor along it."*
- 5.12 The incorporation of the planted swale which runs the sites northern and western boundaries discharge into the Taf will help to bring the River setting 'into' the site through incorporating water features/SuDS/watercourses in the public realm.

- 5.13 Overall the proposals are effective in achieving placemaking principles set out specifically in policy SW6 (Hoover Strategic Regeneration Area) and more broadly adopted in Future Wales and PPW11. The proposals will develop a disused brownfield parcel significantly improving the public realm in its development.

Transport

- 5.14 The proposals are supported by a Transport Assessment prepared by Lime Transport. An outline planning application was submitted in 2017 ref. P/17/0144 for residential and business (Use Class B1) development. At the time of this development the scope for the Transport Assessment was discussed and agreed with the Local Highway Authority. The scope of this Transport Assessment has been based on previous discussions with Merthyr Tydfil County Borough Council (as Highway Authority) in December 2016 and the following has been agreed:
- Assess the impact of the proposed development for the year of opening (2025), and opening year + 10 years (2035);
 - 2022 surveyed traffic flows to be 'factored' to 2025 and 2035, using locally adjusted NTM growth forecasts;
 - Assess the impact of the proposed development at the following junctions;
 - Junction 1 - A470/A4060 roundabout
 - Junction 2 - A4060/A4054 Merthyr Road roundabout
 - Junction 3 - A4054/Pentrebach Road Roundabout
 - Junction 4 - The Willows/northern site access roundabout
 - Junction 5 – Merthyr Self-Storage access roundabout
 - Junction 6 – Stanfield Close/southern site access roundabout
 - Junction 7 - A4054 High Street/Lower High Street/A4102 roundabout.
 - Trip generation rates for the proposed development to be determined following a review of TRICS 7.9.2 trip generation database; and,
 - Distribution of development generated traffic to be based on 'Journey to Work' statistics from the 2011 Census.
- 5.15 The Transport Consultant has discussed the scope with the current Local Highway Authority who have confirmed the content is acceptable.
- 5.16 In order to access the development, it is proposed to utilise and enhance the existing accesses to the site from the un-named road to the north and south of the development. The main vehicular access to the site will be from the Stanfield Close roundabout (to the south), with the access from the north for emergency vehicles only. It is anticipated that the two vehicular accesses to the site will also

provide access for pedestrians and cyclists. It is also proposed to provide an additional pedestrian (and cyclist) connection along the western edge of the site boundary.

- 5.17 The site is located within Zone 2-6 resulting in a parking requirement of one space per bedroom (maximum requirement of three spaces) together with visitor parking of one space per five dwellings. This results in a maximum requirement of 534 parking spaces, and it is proposed to provide 493 spaces on-site. Based on the level of car parking provision proposed, there is sufficient capacity to accommodate an element of visitor parking on plot.
- 5.18 Cycle parking will be provided in accordance with the adopted standards with cycle access and storage being a factor of dwelling design, for the residential element of the site. Communal storage for apartments will be provided at a rate of 1 stand per 5 bedrooms, in line with adopted standards. There are a number of cycle routes within the vicinity of the site, including National Cycle Network Routes 8 (to the west) and 477 (to the east), with additional local routes, also east of the site. The existing cycle routes provide a largely traffic free route between the site and:
- Merthyr Tydfil Town Centre (to the north);
 - Local employment areas to the north, south and east of the site; and,
 - Local facilities within Abercanaid, Troedyrhiw and Aberfan to the south.
- 5.19 For houses, it is anticipated that residential refuse will be collected on-street (from within the development), with residents placing their refuse on the kerbside on the allotted collection day. Refuse storage points have been provided at the private driveways, within the recommended walk distance for both residents and refuse operatives. For apartments they will have a conveniently located, communal bin store that refuse will be collected from on collection day.
- 5.20 Swept path analysis of a range of vehicles likely to access the site including a family car, delivery vehicle, fire tender and a refuse vehicle is included in **Appendix B** of the Transport Assessment.
- 5.21 The analysis indicates that all but three of the junctions (the A470/A4060 roundabout, the A4060/A4054 Merthyr Road roundabout and the A4102/A4054 High Street/Lower High Street roundabout) within the study area have sufficient capacity to accommodate the anticipated residential development on part of the former Hoover Factory.

- 5.22 However, the analysis indicates that the A4102/A4054 High Street/Lower High Street roundabout is already operating significantly above capacity, and that the impact of the proposed development (as assessed) is relatively minor. Furthermore, percentage impact analysis at the A470/A4060 roundabout and the A4060/A4054 Merthyr Road roundabout shows that the impact of the development on the operation of these junctions is negligible.
- 5.23 As part of a previous planning application for the site, it was stated by the Highway Authority that whilst two junctions are likely to operate over capacity in the future scenario, the impact as a result of the proposed development would be relatively minor.
- 5.24 The impact of the development can be further reduced with the production of a residential Travel Plan that seeks to reduce reliance of private vehicles in favour of more sustainable and active travel modes.
- 5.25 In light of the above, it is considered that the proposed development is in accordance with the RLDP and Policy 12 (Regional Connectivity) of Future Wales, and as such, is acceptable in regard to transport/highways considerations.

Ecology and Biodiversity

- 5.26 A range of Ecology Surveys have been undertaken at the site and the following reporting supports the proposals:
- Alder Ecology UK Ltd- Ecological Summary November 2022.
 - Alder Ecology UK Ltd- Ecological lighting assessment November 2022.
 - Ecological Services Ltd - Bat survey report September 2022.
 - Ecological Services Ltd – NVC and reptile survey March 2022.

Alder Ecology UK Ltd- Ecological lighting assessment November 2022

- 5.27 **Summary of findings-** The survey assessed the site to understand the baseline lux levels for the site taking into account off site light spill and light trespass. The survey had a minimum site lux level of 0.23 lux and an upper lux level of 21.8 lux and that the site predominantly sits in zones 3 and 4 according to The Society of Light & Lighting guidance documents. The areas of lower lux correspond to areas more regularly used by bat species from the surveys previously conducted on site.

Ecological Services Ltd - Bat survey report September 2022.

- 5.28 Summary of findings- The survey found that a total of five bat species (common and soprano pipistrelle, Noctule, Myotis sp and Brown long eared bat) were regularly using the site for foraging and a sixth species Lesser horseshoe bat was suspected (based on sonogram results) to be using the site, but this was not further confirmed. There are three main areas of the site regularly used by bat species; east corridor close to the River Taff, west boundary close to Wildwood [road], and the north-west boundary.

Ecological Services Ltd – NVC and reptile survey March 2022.

- 5.29 **Summary of findings-** A full reptile presence and absence survey was conducted for the site and reptiles were found to be absent over the survey period. The reptile survey recommended enhancements for future use of the site by reptiles. The NVC survey found two areas of the site (Fen meadow habitat and rush pasture habitat) to have a good composition of floristic species and were assessed to be of sufficient quality to meet the SINC criteria. The survey recommended retaining habitat areas if possible or translocate on site.
- 5.30 The site 'Landscape Biodiversity and amenity strategy'- Catherine Etchell Associates 2022 details measures to be employed on site and is the main document for reference and includes the following proposals:
- Retain vegetation in riparian corridor except non-native alien invasive species
 - Use existing top soil to re-seed areas on site
 - Create a pollination corridor east, west across the site
 - Translocate rush pasture and fen meadow species into swale area and area in south of the site
 - Pond retained located on swale and enhanced
 - Planting of high percentage native vegetation
 - Reinforce existing vegetation in south and boundaries
 - SUDs areas contain both native vegetation and translocated species
 - Advocate low level lighting along east boundary
 - Create site links east -west and south –north for species movement
- 5.31 These measures are measures that have been proposed within various reports for the site and presented as a simple list but referring to existing produced documents will provide full details.

- Retain or translocate areas of marshy grassland (Rush pasture and fen meadow)
- Use native species when planting
- Implement a sensitive lighting strategy for the site

- Provide integrated bird and bat boxes in selected areas on site
 - Strengthen boundary vegetation corridors
 - Do not directly illuminate wildlife movement corridors above baseline levels on east and west boundaries
 - Provide a vegetated buffer between the site and River Taff
 - Use ecological baseline levels to provide guidance to site lighting scheme
 - Remove non-native invasive plant species from the site
 - Provide landscape scheme to provide opportunities for reptile species on site
- 5.32 An Arboricultural Report has been prepared by ArbTS to give an assessment to the quality of the trees at the site, assess the arboricultural impact of the proposed development design and provide details regarding the protection of retained trees during construction work.
- 5.33 A small number of trees are identified to be removed to facilitate the construction of the proposed development design. Most of the trees / scrub identified for removal are low quality (C Category). These trees / scrub should not present a constraint on developing the site. The removal of the small area of moderate quality trees (40 m2 of end part of Tree Group G3 and the individual tree T253) will not cause an significant adverse impact onto the amenity of the area or affect the health of the remaining boundary trees. Adhering to the tree protection details as found within the report the proposed development can be constructed without any significant long-term adverse impact onto the retained trees or the amenity of the area.
- 5.34 In light of the above, it is considered that the proposed development is in accordance with RLDP Policies EnW1 (Nature Conservation and Ecosystem Resilience), Policy EnW3 (Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species) and Policy 9 (Resilient Ecological Networks and Green Infrastructure) of Future Wales; and as such, is acceptable in regard to ecology and biodiversity.

Flooding

- 5.35 A planning permission was granted ref. P/20/0025 for engineering works including the provision of a drainage channel/swale and culvert/outflow, raising of the site levels and creation of a site access on the 19th November 2020. The reason for the application was to channel flood water through the site allowing the majority of the development plateau to be removed from flood zone C2 as defined by the NRW development advice maps. The site levels and drainage channel works have taken place therefore form a feature of the

current site circumstances. A flood map challenge has been submitted and approved and the updated can be seen on the new flood map for planning. The map demonstrates the flood channel is within flood zone 3 whilst the site plateau is zone 1 and partly zone 2.

- 5.36 NRW are no longer making updates to the DAM. However, were they to do so the Flood Zones for the site would appear as shown in Figure 3-2 within the FCA. This clearly shows the effectiveness of the flood mitigation scheme in substantially reducing the extent of flood risk, such that Flood Zone C2 is almost entirely confined to the flood mitigation scheme. All other areas would be classed as Flood Zone A.
- 5.37 The principal source of flood risk to the site is the Nant Canaid, an Ordinary Watercourse originating to the west of the site and extensively culverted to the south of the site. The limited capacity of this culvert system is predicted to direct exceedance flood flows overland towards and across the site.
- 5.38 The FCA follows a previously successful planning application and FCA for development enabling flood mitigation works at the site, which have now been implemented. The Dragon Parc Flood Mitigation Scheme works by channelling floodwater around the perimeter of site and away from areas of proposed residential development.
- 5.39 Detailed flood modelling has been undertaken based on the NRW accepted model, incorporating the proposed development, to inform this FCA. This modelling includes appropriate allowances for climate change and the risk of culvert blockages on the Nant Canaid. Under all scenarios the site is predicted to be flood free, having no negative impact on the flood risk elsewhere.
- 5.40 This FCA has demonstrated that all requirements of TAN15, including all acceptability criteria, have been satisfied. Consequently, we conclude that on the grounds of flood risk, the proposed development meets the requirement set out in TAN-15 and the aims of Planning Policy Wales.
- 5.41 Comments received from NRW at PAC confirms that we have reviewed the submitted FCA by JBA (Version 1, dated November 2022), which shows that the risks and consequences of flooding are manageable to an acceptable level. Therefore, we have no objection on flood risk grounds to the application submitted. It will be for the planning authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15.

Noise

- 5.42 Acoustic Consultants have completed a Noise Assessment at the site. The presented report is based upon noise measured at the site and considers road traffic from the surrounding road networks, rail vehicle noise, along with industrial noise from the nearby industrial premises. The report assesses the suitability of the site with respect to Planning Policy Wales (PPW), TAN 11, British Standard 8233:2014 / WHO (1999), and British Standard 4142:2014+A1:2019.
- 5.43 When assessed in accordance with the methodology of the BS4142 initial estimate, industrial noise to the east and north boundaries falls within a low impact assessment to these closest boundary edges. However, industrial noise from the western unit, Loadlock, exceeds the existing daytime background noise by up to 10 dB.
- 5.44 However, when the context of the site (i.e., mitigation measures already specified above for road traffic noise in Section 6.2) is considered, and internal absolute levels due to commercial operations are predicted, it is clear good acoustic conditions can be achieved in accordance with BS8233:2014 criteria.
- 5.45 Further to this, we would consider that boundary fences would typically be installed around any proposed dwelling that lies adjacent to the industrial units. If this were completed to a certain specification of design and material mass (minimum 10kg/m²), noise from the Loadlock site at a dwelling could potentially be lower than predicted.
- 5.46 The report has identified the façades of dwelling proposed that will require mechanical ventilation system in order to reduce the need for windows to be open for rapid or purge ventilation as a minimum.
- 5.47 On this basis, noise from the industrial unit to the west (Loadlock) can be suitably controlled and is considered to be of a low impact on the proposed dwellings, and as such, the aims of PPW are considered to be met in terms of noise.

Other Material Planning Considerations

Ground Contamination

- 5.48 Given the planning history at the site there has been extensive Ground Investigation and Remediation Works to ensure the ground is made safe for residential development. Due to the complex nature of ground conditions at the site it is recommended that the submitted reporting is reviewed.

Drainage

- 5.49 Quad Consult have completed a Drainage Strategy for the proposals. A surface water drainage strategy has been developed that embraces

the ethos of CIRIA C753 (The SuDS Manual) and the Statutory SuDS Standards in Wales with initial high-level discussion with the local SAB officer having taken already taken part.

- 5.50 Overland conveyance has been provided wherever possible with pre-treatment for plot drainage being offered through the inclusion of private plot porous drives, Bio-planters, or Swales all within immediate proximity of the dwellings, with adoptable areas of shared drives and roads discharged via porous paving, raingardens or swales. Runoff will be conveyed through the development using a combination of Swales and underground pipe network to a Detention Basin where runoff will be discharged indirectly to the river Taff via a flood alleviation channel at a controlled rate.
- 5.51 With site levels being raised significantly the development will have an engineered plateau formation, as a result infiltration to ground has been discounted at this time with all proposed surface water conveyance, treatment, and storage elements being lined.
- 5.52 QuadConsult Ltd propose to collect and gravitate all foul flows via a new piped system constructed within the main spine road. This travels North to South through the development and through the new access road in the South, connecting into the adopted DC/WW sewer on Wildwood Rd.

Conclusion

- 6.1 This Planning Statement accompanies the Full Planning Application relating to residential development of 200 homes, engineering works, access formation, landscape, drainage and associated works at Land at Dragon Park, Abercanaid, Merthyr Tydfil
- 6.2 The site is identified being within the Regeneration Site ref. Hoover Strategic Regeneration Area, Policy SW:6 is therefore relevant. The policy states that the Hoover Strategic Regeneration Area is identified to facilitate a major mixed-use development comprising 440 new homes.
- 6.3 Policy SW6 makes reference to a number of sustainable placemaking design principles that development proposals in the Hoover Area should meet. The architectural plans and DAS provide a comprehensive overview of the proposals which demonstrates compliance with placemaking principles. This has also been discussed above with direct reference to specific principles set out for developments in the Hoover Area to achieve.
- 6.4 In terms of flooding the development site is at little or no flood risk due to the flood mitigation work already in place. The only exceptions are some limited areas of risk in the extreme design event (see figure 5-4 of the FCA), all of which flood to very shallow depths compliant with TAN15. However, as the site is then further raised the risk of flooding is effectively eliminated.
- 6.5 The Transport Assessment has provided an analysis of junctions and roundabouts within the surrounding area in accordance with advice given by the LHA. The assessment has confirmed there are no issues with the increase in traffic movements associated with the development.
- 6.6 A range of ecology surveys have taken place and the reporting written up to support this application. The reports demonstrate that through mitigation and enhancement measures the proposals will be acceptable in relation to ecology. There is opportunity to provide enhancements to what currently is a brownfield site that is disused.
- 6.7 The proposals adopt a surface water drainage strategy has been developed that embraces the ethos of CIRIA C753 (The SuDS Manual) and the Statutory SuDS Standards in Wales with initial high-level discussion with the local SAB officer having taken already taken part.

- 6.8 Given the planning history at the site there has been extensive Ground Investigation and Remediation Works to ensure the ground is made safe for residential development.
- 6.9 Consequently, it is considered that this Planning Statement clearly demonstrates that the scheme, as presented, complies with the relevant national and local planning policies including supplementary planning guidance. As such it is respectfully requested that Merthyr County Borough Council grant full planning consent for the proposed student accommodation.