

# PLANNING STATEMENT

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## **Land to the North of Goitre Lane, Merthyr Tydfil**

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February 2024



## Summary

**Proposal:**

Construction of a new Primary School including access, landscaping, play / sports pitches, parking, external works, swale, plant and associated works

**Location:**

Land to the North of Goitre Lane, Merthyr Tydfil

**Date:**

February 2024

**Project Reference:**

23.162

**Applicant:**

Merthyr Tydfil County Borough Council

**Product of:**

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## Introduction

- 1.1 This This Planning Statement accompanies the full planning application submitted on behalf of Merthyr Tydfil County Borough Council for the Construction of a new Primary School including access, landscaping, play / sports pitches, parking, external works, swale, plant and associated works at Land to the North of Goitre Lane, Merthyr Tydfil.
- 1.2 The proposals will provide a modern education facility for the current Goetre Primary School which would move into this new site.
- 1.3 The proposals are being delivered as part of the 21st Century Schools programme which is a One Wales commitment and a unique collaboration between the Welsh Government, the Welsh Local Government Association and councils. It is a major, long-term and strategic capital investment programme with the aim of creating a generation of 21st Century Schools in Wales. The programme will create schools of the right type and size in the right place.
- 1.4 The following plans and reports are submitted:

| Plans                                               | Ref                                |
|-----------------------------------------------------|------------------------------------|
| Site Location Plan                                  | 26CB01-LAW-XX-GF-DR-A-039-0001-P02 |
| Proposed 3D Views                                   | 26CB01-LAW-XX-GF-DR-A-060-0001-P03 |
| Proposed 3D View Images                             | 26CB01-LAW-XX-GF-DR-A-060-0002-P03 |
| Ground Floor Plan GA                                | 26CB01-LAW-XX-GF-DR-A-061-1001_P04 |
| Roof Plan GA                                        | 26CB01-LAW-XX-GF-DR-A-061-1002_P02 |
| Proposed Elevations                                 | 26CB01-LAW-32-XX-DR-A-062-2100_P01 |
| Proposed Sections                                   | 26CB01-LAW-XX-GF-DR-A-063-001_P03  |
| Proposed Site Plan                                  | 26CB01-LAW-30-00-D-A-069001_P00    |
| Vehicle Swept Path Analysis<br>- Fire Tender        | CC2538-CAM-XX-XX-DR-C-0100-P04     |
| Vehicle Swept Path Analysis<br>- Refuse             | CC2538-CAM-XX-XX-DR-C-0101-P04     |
| Vehicle Swept Path Analysis<br>- Standard Rigid Bus | CC2538-CAM-XX-XX-DR-C-0102-P04     |

|                                                          |                                               |
|----------------------------------------------------------|-----------------------------------------------|
| Vehicle Swept Path Analysis<br>- Rigid Truck             | CC2538-CAM-XX-XX-DR-C-0103-P03                |
| Vehicle Swept Path Analysis<br>- Standard Design Vehicle | CC2538-CAM-XX-XX-DR-C-0104-P03                |
| Proposed External Hard Works                             | 26CB01-CAM-50-XX-D-C-1100-S4-P04              |
| Proposed Levels Plan                                     | 26CB01-CAM-51-XX-D-C-0600-S4-P04              |
| General Arrangement Plan                                 | 26CB01-CAM-52-XX-D-C-0002-S4-P01              |
| Proposed Surface Water Drainage Plan                     | 26CB01-CAM-52-XX-D-C-0504-S4-P03              |
| Proposed Foul Water Drainage Plan                        | 26CB01-CAM-52-XX-D-C-0509-S4-P03              |
| Pitch Drainage Construction Details                      | 26CB01-CAM-52-XX-D-C-1105-S4-P02              |
| Drainage Construction Details                            | 26CB01-CAM-52-XX-D-C-1106-S4-P02              |
| Drainage Construction Details                            | 26CB01-CAM-52-XX-D-C-1107-S4-P02              |
| Proposed Catchment Plan                                  | 26CB01-CAM-53-XX-D-C-1500-S4-P03              |
| Landscape and GI Constraints and Opportunities Plan      | 2387201 - SBC - 00 - XX - DR - L - 300 - PR02 |
| Strategic Soft Landscape Plan                            | 2387201 - SBC - 00 - XX - DR - L - 400 - PR07 |
| External Areas Calculation                               | 2387201 - SBC - 00 - XX - DR - L - 401 - PR04 |
| Tree Pits and Hedge Details                              | 2387201 - SBC - 00 - XX - DR - L - 500 - PR01 |
| Lighting Plan                                            | 26CB01-WSP-30-00-D-E-630301                   |
| External Services Plan                                   | 26CB01-WSP-73-00-D-ME-500301                  |

| Reports                                                     | Consultant              |
|-------------------------------------------------------------|-------------------------|
| Planning Statement                                          | Asbri Planning          |
| PAC Report                                                  |                         |
| Planning Application Form                                   |                         |
| Design and Access Statement                                 | Lawray Architects       |
| Transport Assessment                                        | Asbri Transport         |
| Travel Plan                                                 |                         |
| Phase One Ecology Report                                    | Ecological Services Ltd |
| Reptile Survey Report                                       |                         |
| Arboricultural Impact Assessment inc. tree survey, TCP, TPP | ArbTS                   |
| Acoustic Report                                             | Formant Ltd             |

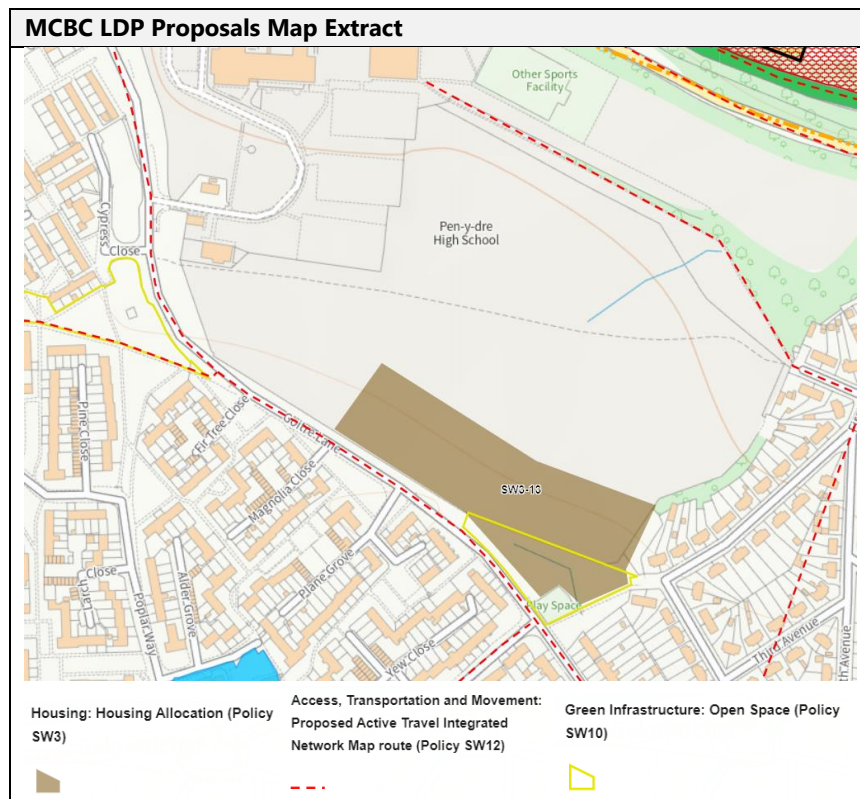
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|---------------------------------------------------|---------------------------|
| Baseline Noise Survey Report                      |                           |
| Ground Investigation Reports                      | Earth Science Partnership |
| Green Infrastructure Strategy Rev C               | Soltys Brewster           |
| Energy Statement                                  | WSP                       |
| Site Investigation Report                         | Integral Geotechnique     |
| Archaeological and Heritage Desk-Based Assessment | EDP                       |

- 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:** pre-application discussions
  - **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.

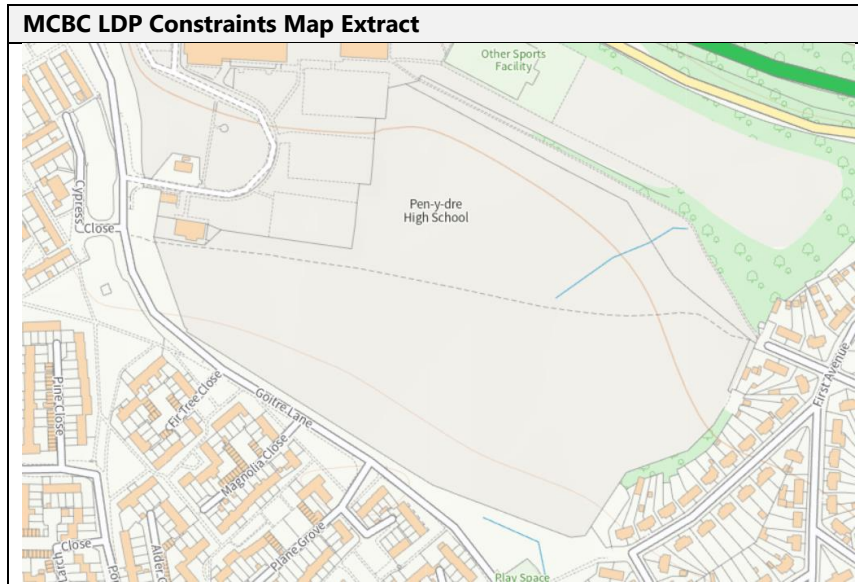
## Site Description

### The Site & Surroundings

- 2.1 The application site comprises a parcel of green field land that is located to the south of Pen Y Dre High School and north of Goitre Lane. The application site is largely semi-improved grassland with various trees and shrubs located throughout. The site slopes north to south.
- 2.2 The sites southern boundary adjoins Goitre Lane and extends into the highway where new works are proposed. The eastern boundary is formed by existing properties with the northern boundary being vacant land that is ancillary to Pen Y Dre High School albeit does not comprise any formal space for the school i.e. it is not formal open space for the school. The eastern boundary is formed by further land within the wider Pen Y Dre school boundary. The site generally sits away from adjacent uses and is considered a suitable location for a new school. To the south east of the site is a designated open space / LEAP.
- Merthyr County Borough Council Local Development Plan**
- 2.3 The site lies within the settlement boundary for Merthyr and is partially within the housing allocation ref. SW3-13. The site is otherwise undesignated white land.

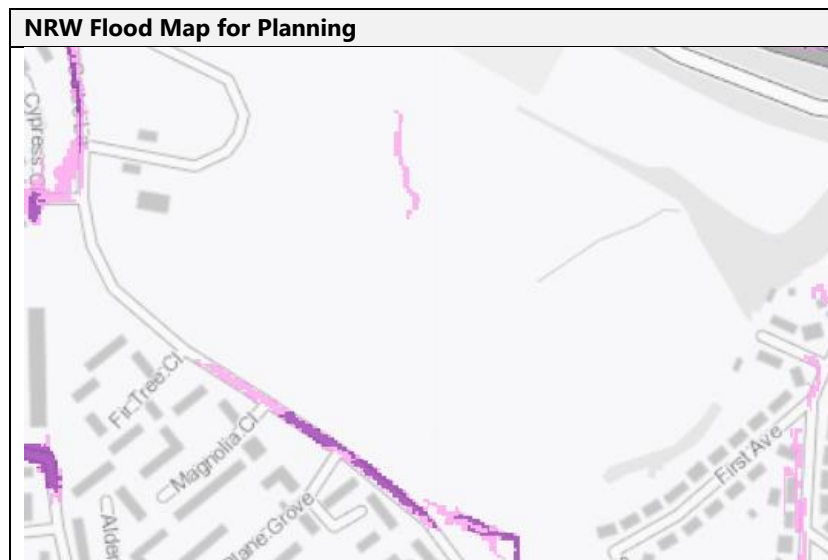


- 2.4 The LDP constraints map shows the site is located within Merthyr Tydfil Landscape of Outstanding Historic Interest.



#### **Flood Risk**

- 2.5 The flood map for planning shows that the site is located within flood zone 1 for both river and sea flooding and flooding from surface water and small water courses.

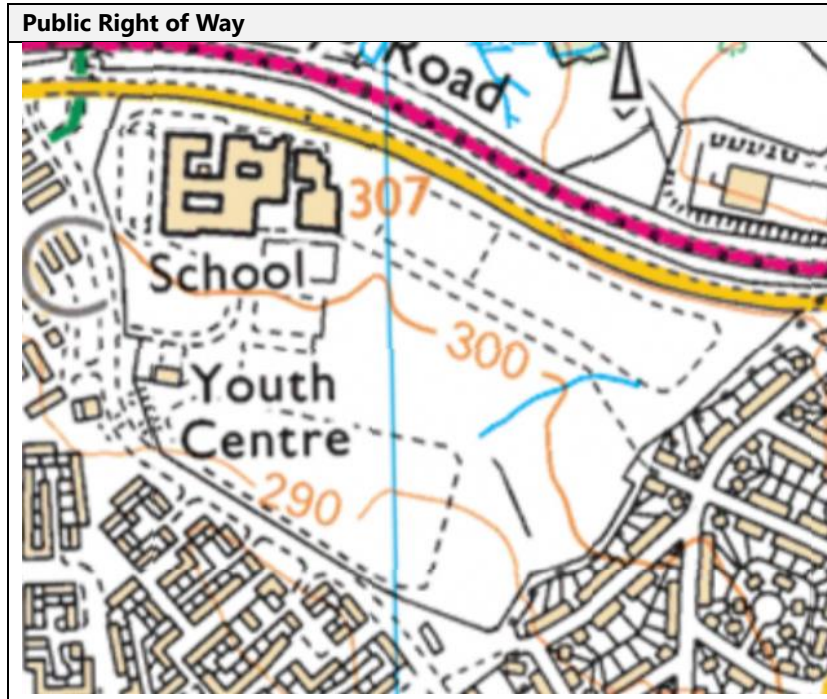


#### **Cadw**

- 2.6 A review of the Cadw mapping shows there are no listed buildings within or adjoining the site. The site is not within a conservation area.

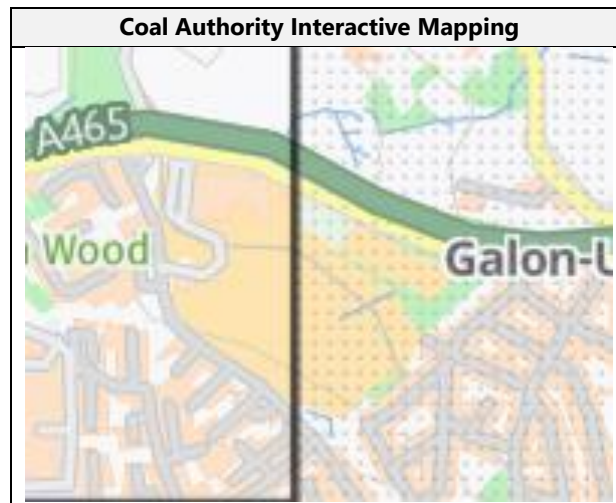
### Public Rights of Way

- 2.7 There are no public rights of way within or adjoining the site.



### Coal Mining Legacy

- 2.8 The Coal Authority Interactive Mapping shows part of the site is not within a 'Development High Risk Area' not is it near any mine entry points. The area of shading below is the coal mining reporting area.

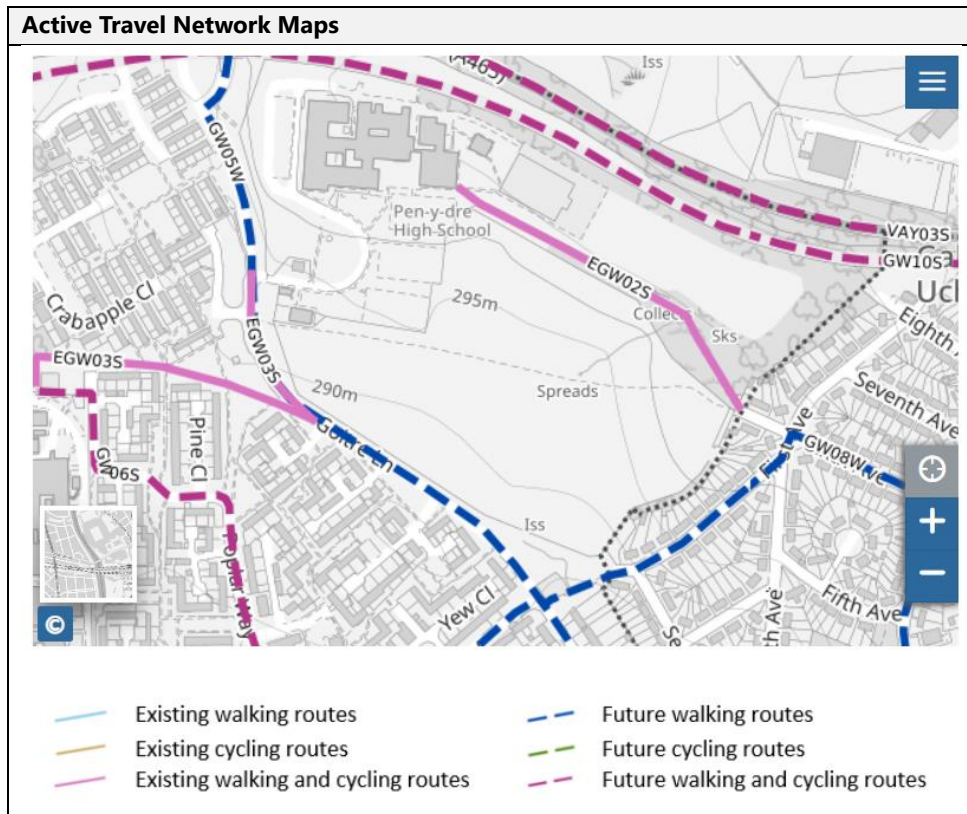


### Heritage

- 2.9 From a heritage perspective, there are no listed buildings on or near the site. The historic environment record identifies that the site was once comprised Goitre Pond.

### Movement and Access

- 2.10 The site does not currently benefit from a formal access given it is undeveloped. A gated access exists to the south western boundary.
- 2.11 Goitre Lane runs immediately to the south of the site and connects to the Gurnos Ring Road. The Heads Of The Valleys Road runs closely to the north.
- 2.12 There are bus stops located on Goitre Lane.
- 2.13 The Active Travel Network Maps show that there are both existing and proposed cycle routes in the surrounding vicinity.



## Development Proposals

- 3.1 The proposal comprises Construction of a new 420 pupil 2FE school, with additional nursery, pre-school, LRB and community facilities including access, landscaping, play / sports pitches, parking, external works, swale, plant and associated works. The proposals include a new school to replace the existing Goetre Primary School which is located to the south west of the site off Gurnos Road.
- 3.2 The school Gross Internal Floor Area is 3,212m<sup>2</sup>, its Gross External Floor Area amounts to 3,465m<sup>2</sup>. The proposed site area for the school as it currently stands is 32,208m<sup>2</sup> or 3.2ha.
- 3.3 The school is designed for 420 children and will have two form entry system (2FE) for each school year which will be based in 14 general classrooms. In addition, 2 Nursery classes will provide a provision for eighty-seven children. Whilst support for the general curriculum will be assisted by providing 2 Learning Resource Bases (classrooms) for infant and primary, making a total of 18 classrooms in total to the main school. A Sensory Immersion Room is provided in addition to the LRB's which provides a visual and sound stimulating space. The school if including the crèche (flying start) offers provision from the years 0 to 11.
- 3.4 Community benefits in addition to the school includes:
- a creche (Flying Start),
  - community tutorial kitchen,
  - community rooms with a food distribution room for donated food items
  - community garden
  - The Sensory Immersion Room that can also be used by the community outside of school hours
- 3.5 External play facilities will be provided which includes a sports pitch, MUGA, amphitheatre play area, climbing area and therapeutic garden.
- 3.6 The scheme is required to achieve the standard of BREEAM Excellent certification for Design and Post-Occupancy stages for the project.
- 3.7 The routes to the school are primarily made by foot, however the school has planned, to encourage the use of cycles, utilising and extending safe routes to school via the nearby network. A proportion of children are brought to school by car and to lessen the impact on

Goitre Lane from uncontrolled parking a parallel drop off for 25 cars is provided.

- 3.8 The proposals includes 40 no. cycle spaces which will be safe and secure and in an accessible location to the front of the school. A total of 80 no. car parking spaces are provided including visitor, EV charging and accessible parking.
- 3.9 There is significant opportunity for landscaped areas in the surrounding spaces of the school grounds which have been designed by Landscape Architects Soltys Brewster this includes a swale which runs the length of the eastern and northern boundaries. The swale provides an opportunity for a unique biodiverse strong environment to be created.
- 3.10 Appropriate fencing will be located at various junctures across the site to ensure safety and security including welshmesh fencing.
- 3.11 A full review of the proposals is contained within the Design and Access Statement.

## Pre-application Discussions

- 4.1 Prior to the full planning application submission both formal pre-application enquiry with the LPA and statutory Pre-application Consultation (PAC) have been undertaken. A summary of each will be provided below:

### **Pre-application Enquiry**

- 4.2 A formal pre-application enquiry was submitted on the 20<sup>th</sup> November 2023 with a response received 7<sup>th</sup> February 2024. The written response ref. PA/23/0032 confirmed the following:

#### ***Principle of development***

- The application site is within the settlement boundary as defined by LDP Policy SW4 and as shown on the associated proposals map where there is a presumption in favour of development and the efficient use of land is encouraged.
- The application site is within a sustainable location and would be easily accessible via sustainable and public modes of transport.
- Whilst the site is partly within a housing allocation it is considered that the allocated 40 homes could still be accommodated on the remaining parcel(s) of land in the allocation however at a higher density. Given the amount of allocated land that would remain undeveloped and as there would still be opportunity to provide the allocated housing no objection is raised to the principle of the development.

#### **Character and Visual Amenity**

- The school adopts a contemporary design and material palette which is considered to be acceptable for the proposed use and to sit comfortably within its surroundings.
- The emphasis on renewable energy and natural lighting further adds to the sustainable credentials of the scheme.
- No concern is raised in relation to the design of the proposed development, to its visual impact or its impact upon the character of the area. The proposed development is considered to comply with the requirements of LDP Policy SW11.

#### **Residential Amenity**

- The land subject of this enquiry is allocated for development with the principle being considered and justified in an earlier section of this response. The proposal would inevitably have a different impact when compared with the existing however this is not considered to be unacceptable or to warrant concern.
- The proposed school has a low profile, is single storey and would be set away from the closest residential properties by several meters.

Therefore no unacceptable impact in respect of outlook, overlooking or over shadowing has been identified.

#### **Parking and Highways**

- The proposed development in respect of both vehicular and pedestrian access and safety has been informed with the input of the Local Authorities Highways Department, as such the proposed development has been considered acceptable by the Highways Department with no concern or objection being raised.

#### **Ecology**

- Chapter 6 the proposal must demonstrate a net benefit in respect of biodiversity. It is considered that there is sufficient space for this to be accommodated on site and full details of how a net benefit can be achieved must be provided at application stage.
- Overall, no in-principle concerns in respect of ecology have been raised by the Council's Ecologist and subject to additional information/survey work being submitted in support of the development.

#### **Statutory Pre-application Consultation**

- 4.3 A Statutory PAC was held on the 19<sup>th</sup> December 2023 until the 18<sup>th</sup> January 2024 inclusive. This included a public engagement event in the school grounds during January.
- 4.4 A summary of the response received is provided below and a full review is contained in the PAC report:

| <b>Consultee</b>          | <b>Response</b>                                                                           |
|---------------------------|-------------------------------------------------------------------------------------------|
| Public                    | No response.                                                                              |
| Local Councillors         | No response.                                                                              |
| South Wales Fire          | No concerns standard suite of comments.                                                   |
| Canal and River Trust     | Returned consultation.                                                                    |
| Agricultural Land         | No objection.                                                                             |
| NRW                       | Returned consultation.                                                                    |
| Cadw                      | No objection.                                                                             |
| DCWW                      | No significant objections.<br>Comments which have been reviewed by the project engineers. |
| Trunk Road Agency         | Comments which have been responded to in the PAC report.                                  |
| Merthyr Highway Authority | No objection.                                                                             |
| Coal Authority            | Outside of the development high risk area.                                                |

|      |                                              |
|------|----------------------------------------------|
| DOCO | Comments which the architects have reviewed. |
| GGAT | No objection.                                |

## Planning Policy Context

### Introduction

- 5.1 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 2016 – 2031
- 5.2 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);
  - Supplementary Planning Guidance.
- 5.3 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**

- 5.4 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.

- 5.5 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**

- 5.6 The National Development Framework: Future Wales – the National Plan 2040 was published on 24<sup>th</sup> 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.
- 5.7 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

- 5.8 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*

- 5.9 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).
- 5.10 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

- 5.11 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”*.

- 5.12 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.*

Biodiversity and Green Infrastructure

- 5.13 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).
- 5.14 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).

- 5.15 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

- 5.16 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).*
- 5.17 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 12**

- 5.18 Planning Policy Wales (PPW) Edition 12 was published on 7<sup>th</sup> February 2024. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.

5.19 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"*.

5.20 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

5.21 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"*.

5.22 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"*.

5.23 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"*.

5.24 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*

5.25 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”.*

#### Good Design

- 5.26 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”.*

#### Welsh Language

- 5.27 It is set out in PPW that the Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. Paragraph 3.29 states that *“If required, language impact assessments may be carried out in respect of large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language”.*

#### Sustainable Transport

- 5.28 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”.*
- 5.29 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

- 5.30 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"*.

#### Green Infrastructure

- 5.31 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.3.11 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"*.
- 5.32 Section 6.2.12 states that a green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal.
- 5.33 Section 6.4.11 states that enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.
- 5.34 Section 6.4.12 states where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission.

#### Sustainable Drainage Systems (SuDS)

- 5.35 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

- 5.36 The following Technical Advice Notes (TANS) are of relevance to the development proposal.
- 5.37 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.
- 5.38 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.
- 5.39 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*
- 5.40 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.

- 5.41 TAN 16 Sport, Recreation and Open Space (2009): advises on the role of the planning system in making provision for sport and recreational facilities and informal open spaces, as well as protecting existing facilities and open spaces in urban and rural areas in Wales (Para 1.1). The TAN states that young people's recreational needs are a priority, improving levels of physical activity and access to facilities in and outside schools (Para 1.9).

### **Local Level**

#### **Merthyr Tydfil Replacement Local Development Plan 2016 - 2031**

- 5.42 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decision should be made in accordance with the authority's adopted development plan, unless material considerations indicate otherwise. In this instance, the statutory development plan for this application site is provided in Merthyr Tydfil Replacement Local Development Plan 2016 – 2031 which provides the local planning policy framework for the area and was adopted by Council on 29<sup>th</sup> January 2020.
- 5.43 The site lies within the settlement boundary for Merthyr and is partially within the housing allocation ref. SW3-13. The site is otherwise undesignated white land. The LDP constraints map shows the site is located within Merthyr Tydfil Landscape of Outstanding Historic Interest.
- 5.44 The following LDP policies are of relevance in the determination of the Planning Application.

| <b>Policy Reference</b> | <b>Relating to</b>                                                                                                                          |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| SW3                     | Sustainably Distributing New Homes                                                                                                          |
| SW4                     | Settlement Boundaries                                                                                                                       |
| SW10                    | Protecting and Improving Open Spaces                                                                                                        |
| SW11                    | Sustainable Design and Placemaking                                                                                                          |
| SW12                    | Improving the Transport Network                                                                                                             |
| SW13                    | Protecting and Improving Local Community Facilities                                                                                         |
| 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                                                                                                                        |

- 5.45 It is acknowledged that the site is partly located within the housing allocation ref. SW3-13 Pen-Y-Dre Fields, Gurnos. The site is allocated for 40 houses. The site measures 1.55 hectares as identified within appendix 1 of the RLDP which provides site allocation details. It is anticipated the site could accommodate 40 homes.

**Supplementary Planning Guidance**

- 5.46 The following Supplementary Planning Guidance (SPG) are of relevance to the proposed development:
- Design and Placemaking;
  - Nature Conservation;
  - Planning Obligations; and
  - Access Circulation and Parking

## Appraisal

### Overview

- 6.1 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.
- 6.2 The key material considerations of relevance in the determination of the application are as follows:
- The principle of development
  - Delivery of placemaking principles
  - Residential Amenity
  - Transport
  - Ecology and biodiversity
  - Drainage

### The Principle of Development

- 6.3 The application site predominantly comprises white land located within the settlement boundary for Merthyr Tydfil. The site is located to the south of the existing Pen Y Dre High School on land which is visually associated with the school albeit is in no formal use by the school itself. Notwithstanding given that the site is visually and physically connected to Pen Y Dre High School it forms a logical extension to the education use in the area.
- 6.4 The site partly overlaps with the housing allocation ref. SW3-13, known as Pen Y Dre Fields, Gurnos and is allocated for 40 homes. Appendix 1 of the RLDP relates to Site Allocation Details the appendix states that the Pen Y Dre Fields site is:

*"1.55-hectare site is located in the community of Gurnos. The site is allocated for 40 dwellings and is anticipated to deliver affordable housing and other planning obligations in accordance with Policy SW9."*

*"The site is adjacent to an existing open space that has recently received investment. The interface between the two developments should be respected and adequate buffer planting considered. This open space contains known occurrences of Japanese Knotweed on its boundary."*

- 6.5 The RLDP Interactive Proposals Map has been used to determine the amount of overlap with the application site for the new school. It is estimated that the site includes circa half of the housing allocation 0.75ha thus leaving 0.8ha. An area of land is also available to the north west of the proposed car park which could be suitable for residential development and measures 0.35. As such into total there is potential of 1.10ha land for residential development.
- 6.6 It is noted that Goetre Primary School is also a housing allocation for 120 homes. The development of this site could not come forward firstly without the relocation of the school. This planning application for the new school could therefore be considered partly an enabling proposal for the redevelopment of the current school grounds for residential dwellings. It is noted that at 120 homes the housing allocation is the fifth largest allocation within the RLDP period and contributes significant to the delivery of homes in Merthyr. As such whilst the proposals would result in the partial development of a current housing allocation the new school ensures a much larger housing allocation site becomes available. The Goetre Primary School site appears much more suitable for residential development than the Pen Y Dre Fields allocation as is more well connected to existing residential development and provides a continuation in the built form.
- 6.7 Given the land take associated with a new school grounds and considering the catchment area associated with Goetre Primary School it is clear that the only suitable site for the new school is the site included within this application. As above the site forms a logical extension to the current education use at Pen Y Dre High School.
- 6.8 As alluded earlier in the document the pre-application response received confirms that the allocated 40 homes could still be accommodated on the remaining parcel(s) of land in the allocation however at a higher density. Given the amount of allocated land that would remain undeveloped and as there would still be opportunity to provide the allocated housing no objection is raised to the principle of the development.
- 6.9 In considering the above it is clear that the development of the new Goetre Primary School would have many benefits including providing a 21<sup>st</sup> century education facility and allow a housing allocation of 120 homes to come forward. Whilst the proposals would result in the partial development of a current housing allocation this is not considered to be of a detriment to the authorities housing delivery given the release of the Goetre Primary Site and retention of land for potential residential development within the site.

- 6.10 The principle of development is therefore considered to be established and the proposals are compliant with Future Wales and the current Merthyr RLDP including Policy SW4 (Settlement Boundaries).

#### **Delivery of Placemaking Principles**

- 6.11 A key aim of new development in Wales is to meet the placemaking principles set out by national and local policy. Policy SW11 of the LDP relates to Sustainable Design and Placemaking setting out 12 criteria. The proposals will help to achieve criteria which is discussed below.
- 6.12 Firstly the proposals are considered to be appropriate to the local context in terms of scale, height and massing. The site is located to the south of the existing Pen Y Dre High School and to the north and west of existing residential homes. The education use on the site is a common feature in the landscape given the existing use. The building is predominantly single storey with a feature double height entrance space and overall will appear unimposing to the landscape. The pre-application response confirms that 'the school adopts a contemporary design and material palette which is considered to be acceptable for the proposed use and to sit comfortably within its surroundings.'
- 6.13 The site boundaries and buildings are situated away from nearby properties as such there will not be any unacceptable impact on local amenity, loss of light or privacy, or visual impact.
- 6.14 The proposals will contribute to the provision of green infrastructure, including open space by providing both informal and formal play areas in accordance with standards. The proposals includes sports pitches alongside a landscape design and swale that has considered the existing GI in the area and how the site can integrate.
- 6.15 The proposals have considered access arrangements for all users ensuring that entrance ways to the school are appropriate alongside consideration of disabled parking facilities.
- 6.16 The proposal will make use of SuDS to address surface water drainage to promote good water management, including rainwater storage, sustainable urban drainage and porous paving.
- 6.17 Overall the project will help to meet a number of placemaking principles including those set out by policy SW11 of the adopted LDP. This is consistent with the pre-application response which advises 'No concern is raised in relation to the design of the proposed development, to its visual impact or its impact upon the

character of the area. The proposed development is considered to comply with the requirements of LDP Policy SW11.'

### **Residential Amenity**

- 6.18 Given the size of the application site there is sufficient space to locate the school building away from adjoining boundaries which comprise existing housing in the area. The school is significantly set away from any houses and as such no unacceptable impact in respect of outlook, overlooking or over shadowing has been identified. The pre-application response confirms that 'The proposed development has been considered against the relevant criteria of LDP Policy SW11 and no conflict has been identified.'

### **Transport**

- 6.19 Asbri Transport have prepared a Transport Assessment accompanied by Travel Plan. Existing pedestrian provision within the vicinity of the application site is of a good standard and provides access to the school from the surrounding residential areas.
- 6.20 The proposed development seeks to relocate the existing Goetre Primary School to land adjacent to the existing Pen-Y-Dre High School. Goetre Primary School is a full-time school for children ages 3-11, including a Nursery, with a current capacity of 480 pupils. The school has three Complex Needs Classes. The new school will have a capacity of 500 pupils, which includes 80 spaces for the Nursery. A comprehensive over view of the existing arrangements for Goetre Primary Schools is contained within the TA.
- 6.21 In order to obtain the most recent traffic flows on the local highway network, Automatic Traffic Counts (ATC), classified Junction Turning Counts (JTC) and pedestrian counts were undertaken at locations shown in figure 3.5 of the TA. This data shows that on the average weekday, there is a pronounced peak at the start of the school day, which also coincides with the working day. The PM school peak is also clear and is part of an extended period between 3pm and 5pm.
- 6.22 On Tuesday 23 May 2023 Parking Beat surveys were also undertaken at the existing and proposed Goetre Primary school sites. These surveys were undertaken during the AM and PM school peak periods. As expected, this data shows the increase in parking at the start and particularly the end of the school day at both sites. This reflects the basic fact that drop offs are relatively short in duration, with a minimum of dwell time for each vehicle. For the pick up at the end of the school day the dwell time is significantly longer as parents park up in advance of the end of the school day and can be waiting for extended periods. Nevertheless, in both the Am and PM peak hours

the period of maximum demand is relatively short in duration and not cover the whole hour even for the PM peak.

- 6.23 Existing pedestrian provision within the vicinity of the proposed development site is of a good standard and will provide access to the school from surrounding residential areas. In accordance with the Active Travel Wales (Wales) Act 2013, an Active Travel Network Map (ATNM) has been produced which contains details of the proposed anew and improvements to existing active travel routes that the Council will seek to deliver over the next 15 years. Proposals are subject to feasibility assessments.
- 6.24 Swept path analysis has been undertaken for the proposed site access junction using a 13.1m public service vehicle, which is consistent with the type and size of public service vehicles currently used at Pen Y Dre High School. This swept path analysis is included in Appendix H of the TA which also shows visibility splays and stopping site distances. Internal swept path analysis is shown in Appendix I of the TA.
- 6.25 The proposed main access will be equipped with 3m wide share foot/cycle paths, which will extend along the frontage of the school site along the northern side of Goitre Lane connecting with the footpath to the south of the Pen Y Dre High School Access and with the footpath on the northern side of Goitre Land adjacent to the existing playground.
- 6.26 Merthyr County Borough Council have adopted the CSS Wales (2008) Parking Standards. The proposed school will have a minimum of 76 staff (teaching & ancillary). The proposed number of parking spaces as proposed in the site layout, is 80, including 3 visitor spaces. The parking provision includes 4 accessibility spaces and 6 Electric Vehicle charging spaces. While this proposed provision exceeds the parking provision indicated by the parking standards, Merthyr Council highways officers requested that the amount of parking provision be sufficient to accommodate all staff an visitors within the proposed new school site in response to local conditions and to remove the need to utilize on-street parking outside of the school site.
- 6.27 It is also proposed to provide 25 parent drop off/pick up spaces within the development site. This is in accordance with the relevant parking standards (Educational Establishments Note 4), with a suggested range from 15 for most types of school up to 50 for a large comprehensive with a large catchment area.
- 6.28 This amount of drop off/pick up provision, provided in conjunction with a school access strategy along with staggered start and finish

times for the various elements of the school, will minimize the demand for on-street parking outside of the proposed development site.

6.29 Policy SW:12 of the LDP outlines 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.”*

6.30 The school will be required to provide 36 long stay cycle parking and 5 short stay cycle parking spaces, a sum of 41 cycle parking spaces. Cycle parking has been considered and is shown on the site layout.

6.31 The impact of changing travel to/from school patterns has been assessed at key junctions on the local road network, with a minimal impact upon junction capacity and no capacity issues at any of the junctions assessed.

6.32 The pre-application response from the local highway authority is contained within the PAC report and confirms no fundamental cause for concern regarding the developments impacts on the existing highway network. The response also confirms the proposal gives no cause for concern regarding off-street parking provision.

6.33 In conclusion, the proposed development is in an appropriate and accessible location. It is served by a safe access, relevant parking provision is made and it is considered that the traffic generated by the development will have no material impact on highway conditions. As such it is considered that there are no highway or transportation issues that should prevent the proposal from gaining planning permission. The proposal is compliant with policies SW12 (Improving the Transport Network) of the Council's LDP.

### **Ecology and Biodiversity**

6.34 An ecology survey has been completed at the site by Ecological Services Ltd. It should be noted that the PEA relates to the wider Goetre site and a focussed Ecological Impact Assessment will be prepared for the full planning submission. The site has a history of ecology surveys.

6.35 Species rich neutral semi improved grassland is the most dominant grassland and occurs across the site covers the periphery of the southern plateau and the northern.

- 6.36 An invertebrate survey was undertaken by Christian Owen Bio-Surveys in August 2022. A single prolonged daytime visit on 4th August 2022. The results indicate that the site as a whole is an important site for a number of scarce and local invertebrate species and clearly provides suitable habitats for a wide range of invertebrates. The survey found that the conservation value to invertebrates is not evenly distributed across the site, with the areas considered to be of greatest conservation value to invertebrates identified in the map below.



**Map 4:** An aerial view showing key habitats and areas considered to be of greatest conservation value to invertebrates at Goetre Field (outlined in black). Image © Google 2022.

- 6.37 A reptile survey was undertaken during August/September 2022, by Ecological Services Ltd. No reptiles were found during any of the checks, however a precautionary approach will need to be adopted as a number of refugia were lost during the course of the survey.
- 6.38 Ecological Services visited the site on 12th July 2023 to re-assess the quality of the habitats within the site.
- 6.39 The PEA includes a number of recommendations which the development of the Goetre Primary School has considered and will deliver. Effort has been made within the overall site design to promote habitat connectivity and green corridors around the periphery of the site, ideally central corridors would be provided as well. This is evidenced in the landscape design and green infrastructure strategy.
- 6.40 The proposals will include the integration of bat and bird boxes into the elevations. All fencing will be hedgehog friendly. The swale provides the opportunity to create new habitats.

- 6.41 As required by PPW12 a Green / Blue Infrastructure Statement has been provided by Soltys Brewster. The existing Green Infrastructure (GI) asset has been assessed through landscape desktop survey, and the context of the site, in its wider GI network, and within the policy framework in Wales and Merthyr Tydfil.
- 6.42 A pre-application response was received from the LPA ecologist which has been reviewed by the development team and updates to the proposals with regards landscape have taken place to ensure maximum enhancements can be achieved within the site boundary. The planning officer notes in the pre-application response that there is sufficient space for this to be accommodated on site and full details of how a net benefit can be achieved must be provided at application stage.
- 6.43 Given that the site is greenfield in nature there is an obvious and unavoidable loss of existing grassland, a mixture of species rich neutral semi-improved grassland and species rich marshy grassland. The proposed landscape design has sought to maximise available space for GI compensation and introducing ecological resources to the site.
- 6.44 A planning balance must be considered in the determination of the application with regards ecology and biodiversity. The current school is in a significantly poor condition and a new school is needed for the benefit of the students. A 21<sup>st</sup> century facility is key for the staff to be able to deliver a high quality teaching programme. Weighing up the considerations the benefits the proposals will deliver clearly outweigh any negatives associated with the habitat loss.
- 6.45 Notwithstanding the biodiversity enhancements are considered to be proportionate to the scale and nature of the development as set out in section 6.4.12 of PPW12.
- 6.46 The proposal is therefore compliant with PPW11, Technical Advice Notes including TAN: 5 and Policies AW2 (Sustainable Locations), AW5 (New Development) and AW6 (Design and Placemaking) of the Council's LDP.

### **Drainage**

- 6.47 A full SAB application will be submitted for the management of surface water at the site. The proposals are supported by drainage plans which demonstrated compliance with SuDs principles adopted in Wales.

### **Archaeology and Heritage**

- 6.48 an Archaeological and Heritage Desk-Based Assessment has been prepared by EDP. The Site does not contain any designated historic assets (i.e. World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Historic Landscapes, Registered Historic Parks and Gardens or Conservation Areas). As such, no designated historic assets would be physically affected by the Proposed Development within the Site.
- 6.49 No impacts have been identified to the significance of designated historic assets nor non-designated Locally Listed Buildings within the Study Area from the Proposed Development from change within their settings.
- 6.50 The Site holds no potential for archaeological remains pre-dating the c.1826 construction of 'Goitre Pond'. The excavation of the pond and its subsequent infilling and landscaping earthworks during the construction of Pen-Y-Dre High School, between 1963-1970s, as attested to by the 2023 SI, aerial photographs and LiDAR imagery, demonstrate that the Site has been entirely disturbed and such works will have removed any potential archaeological deposits within the Site.
- 6.51 'Goitre Pond' itself is not recorded as a historic asset by either the HER nor Royal Commission on the Ancient and Historical Monuments of Wales (RCAMHW) and the recorded modern made ground deposits across the Site are of no archaeological value. Therefore, it is concluded that no impacts to archaeological remains would occur from the Proposed Development. No archaeological investigation and/or mitigation is recommended nor warranted for the Site, based on the evidence and assessment provided in this report.
- 6.52 The Site is located within the Merthyr Tydfil Landscape of Outstanding Historic Interest (LOHI). The assessment concludes that the proposals would accord well with the character of the LOHI and would not result in the loss of any of its extant historic assets that contribute to its heritage significance. As such the proposal would have no effect on the LOHI.
- 6.53 PAC comments from Cadw confirms they concur with the reports approach and conclusions. The proposed development will have no impact on the settings of any of the above designated historic assets. Whilst GGAT confirms should a similar application to the one you have outlined be submitted, we would be unlikely to recommend any further pre-determination works, or that any archaeological conditions are attached to any consent.

### **Noise**

- 6.54 An acoustic consultant has assessed the noise level present in the area and determined the appropriate building make up working with the design team. The baseline noise survey and acoustic design report are submitted in support of the application. The predictions confirm, with a reasonable degree of certainty, that the future ambient levels will fall below the BB93 thresholds for natural ventilation in all areas. However a small number of rooms on the north elevation will not be suitable for the size of window openings typically required for single-sided ventilation and an alternative ventilation strategy will be required. Façade acoustic upgrades are unlikely to be required, although this will be confirmed as the design progresses.

### **Energy**

- 6.55 An energy statement has been prepared by WSP which considers:
- Sets out the projected annual energy demands for heat and power from the proposed development against the appropriate baseline along with the associated CO2 emissions.
  - Demonstrates how these demands have been reduced via energy efficiency or low carbon energy sources and sets out the CO2 emissions associated with the residual energy demand, and
  - Considers the viability and technical feasibility of renewable energy technologies to reduce these demands.

### **Ground Conditions**

- 6.56 Intégral Géotechnique (Wales) Limited have been appointed as the Geotechnical Engineers to undertake an intrusive site investigation to enable a geotechnical and geoenvironmental appraisal of the educational end use area of the site and provide a basis for design.
- 6.57 The report submitted presents the findings of the intrusive site investigation and gives recommendations for the design of foundations, floor slabs and other geotechnical and geoenvironmental aspects of the project.
- 6.58 In relation to human health risk it is recommended that a capping layer, of a minimum thickness of 600mm, of clean imported subsoil and topsoil is placed in all areas of soft landscaping and any sport pitches underlain by made ground. This should be placed above a robust high visibility anti-mixing membrane/geofabric. This would break all the above listed relevant pollutant linkages.

- 6.59 The desk study shows that the site is not located within a high-risk development area. Shallow coal workings are not recorded and there are no potential shallow unrecorded workings beneath the site.
- 6.60 There are no mine entries located within 100m of the site boundary. It is therefore concluded that there are no viable pathways, via old shafts or adits, for any mine gas beneath, or within an influencing distance, of the site.
- 6.61 No faults, fissures or breaklines are known to affect the development site according to the Coal Authority. The site is also overlain by a thickness of cohesive superficial deposits. Although lines of fault are indicated on the geology map, one of which crosses the site, it is considered that no workings where gas could generate are present beneath the site. It is therefore concluded that the faults would not provide a risk.

## Conclusion

- 7.1 This Planning Statement accompanies a planning application submitted on behalf of Merthyr Tydfil County Borough Council for the Construction of a new Primary School including access, landscaping, play / sports pitches, parking, external works, swale, plant and associated works at Land to the North of Goitre Lane, Merthyr Tydfil.
- 7.2 The development has arisen as part of the 21st Century Schools and Education Programme.
- 7.3 The development of the new Goetre Primary School would have many benefits including providing a 21st century education facility and allow a housing allocation of 120 homes to come forward. Whilst the proposals would result in the partial development of a current housing allocation this is not considered to be of a detriment to the authorities housing delivery given the release of the Goetre Primary Site and retention of land for potential residential development within the site.
- 7.4 Given the land take associated with a new school grounds and considering the catchment area associated with Goetre Primary School it is clear that the only suitable site for the new school within the catchment is the site included within this application. The site forms a logical extension to the current education use at Pen Y Dre High School.
- 7.5 The proposals will contribute to the provision of green infrastructure, including open space by providing both informal and formal play areas in accordance with standards. The proposals includes sports pitches alongside a landscape design and swale that has considered the existing GI in the area and how the site can integrate.
- 7.6 A planning balance must be considered in the determination of the application with regards ecology and biodiversity. The current school is in a significantly poor condition and a new school is needed for the benefit of the students. A 21<sup>st</sup> century facility is key for the staff to be able to deliver a high quality teaching programme. Weighing up the considerations the benefits the proposals will deliver clearly outweigh any negatives associated with the habitat loss.
- 7.7 Notwithstanding the biodiversity enhancements are considered to be proportionate to the scale and nature of the development as set out in section 6.4.12 of PPW12.

- 7.8 The proposed development is in an appropriate and accessible location. It is served by a safe access, relevant parking provision is made and it is considered that the traffic generated by the development will have no material impact on highway conditions.
- 7.9 In considering the above it is clear that the development of the new Goetre Primary School would have many benefits including providing a 21st century education facility and allow a housing allocation of 120 homes to come forward. It is noted that the current school is in a significantly poor condition and a new school is needed for the benefit of the students. A 21st century facility is key for the staff to be able to deliver a high quality teaching programme.
- 7.10 It is therefore considered that the proposal is compliant with each of the relevant policies highlighted, and as such, accords with relevant national and local planning policy and guidance. It is therefore requested that Merthyr County Borough Council's Local Planning Authority grant planning permission accordingly.