

# S&G MERTHYR TYDFIL

**PROPOSED BL EXTENSION**

**DESIGN  
&  
ACCESS  
&  
SUSTAINABILITY**

Issue No. 2

December 2021



**AVANTE ARCHITECTS**

TEC MARINA, PENARTH HAVEN, CARDIFF, CF64 1SA  
029 2167 4697      [WWW.AVANTEARCHITECTS.COM](http://WWW.AVANTEARCHITECTS.COM)

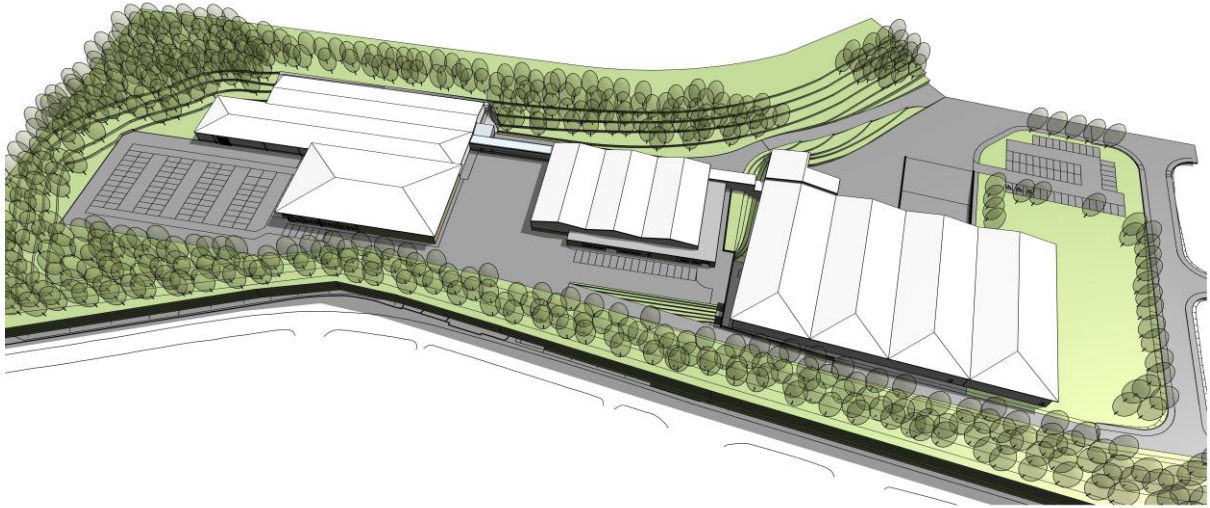
# REVISIONS

## **Issue No. 1    20<sup>th</sup> November 2021**

- 1<sup>st</sup> Issue

## **Issue No. 2    21<sup>st</sup> December 2021**

- General amendments



# CONTENTS PAGE

|     |                              |
|-----|------------------------------|
| 1.0 | Introduction                 |
| 2.0 | Summary of the Proposal      |
| 2.0 | Brief and Vision             |
| 3.0 | Site & context Analysis      |
| 4.0 | Interpretation               |
| 5.0 | Design Development           |
| 6.0 | The Proposal                 |
|     | Character                    |
|     | Access                       |
|     | Movement                     |
|     | Environmental Sustainability |
|     | Community Safety             |
|     | Response to Planning Policy  |

# 1.0 INTRODUCTION

6

This Design and Access Statement refers to, supports and supplements a planning application that is submitted on behalf of S&G Group, in relation to their proposal for an extension to their existing Print Works

In Wales, from 1<sup>st</sup> June 2009, it became a statutory requirement for Design and Access Statements to accompany applications for planning permission and listed buildings consent (with some exclusions). The relevant regulations (and technical guidance) are contained within the following documents

- The Town and Country Planning (Development Management Procedure) (Amendment) (Wales) Order 2012
- Planning Policy Wales (PPW) Edition11 (February 2021).

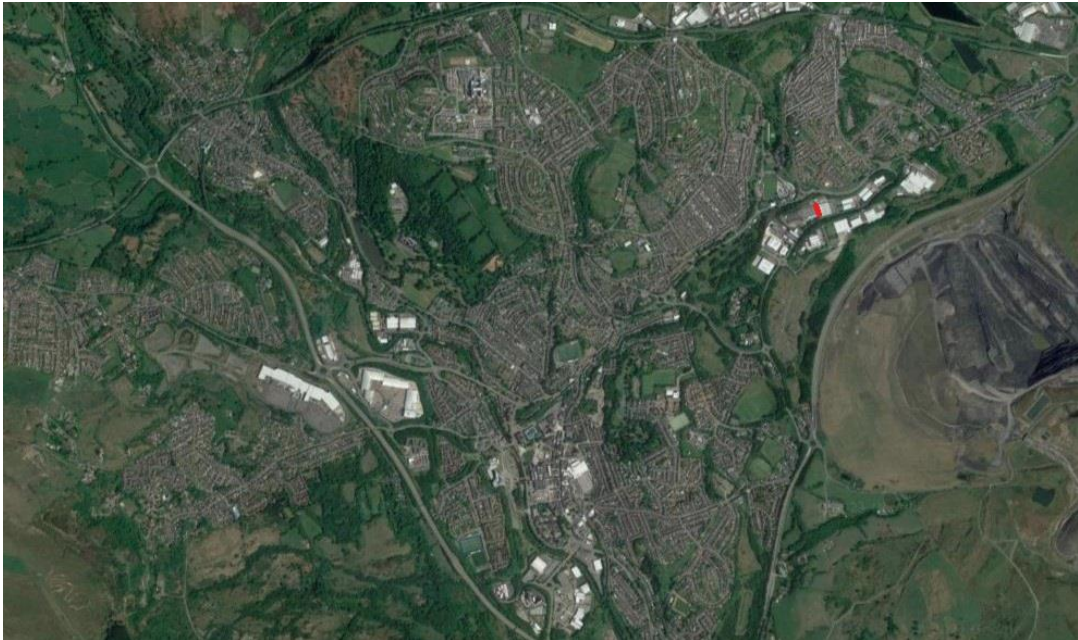
A Design and Access Statement is a document which explains how the objectives of good design have been considered from the outset of the development process.

A Design and Access Statement should effectively:

- Communicate the vision and principles of the scheme.
- Explain how the objectives of environmental sustainability and good design have been applied
- Demonstrate that design issues have been considered early in the design process.
- Demonstrate a commitment to 'inclusive design' – so that the development is accessible to all regardless of age, gender and infirmity.

## 2.0 SUMMARY OF THE PROPOSAL

This application relates to a proposed 60m x 24m approx. extension to the existing Print Works at S&G Group's existing development at Goat Mill Road, Merthyr Tydfil which was developed from a vacant site during the mid 90s.



The area concerned is on the west side of the complex and is currently an open grassed area. The proposal is to add a further bay to an existing 3 bay structure adopting matching dimensions and materials, accessed from within the S&G site. The 3 bay structure itself was granted planning approval under reference 02/0431

The site is wholly owned by the applicant.

## 3.0 BRIEF AND VISION

The proposal needs to provide an internal space for warehousing and machinery. There is no absolute size requirement, but an extension of a further bay of approx. 16 000 sqft will suffice.

The requirement for the extension itself is unremarkable, and there is no need for goods access from the exterior. An internal connection to the existing building is proposed so that the adjacent dock-levellers can be used for the extension. The internal height needs to be a nominal “double-height” but there is no absolute requirement

Therefore a proposal to simply add a further bay adopting matching dimensions and materials will sit well with the brief requirements.

### 3.0 SITE CONTEXT & ANALYSIS

The proposal is sited within an area which has nothing other than industrial development in the immediate vicinity. The nearest residential area is at least 300m to the north over the other side of the valley. Nevertheless it will be important to ensure that the form of the existing complex is replicated in the extension so that its impact is minimal.



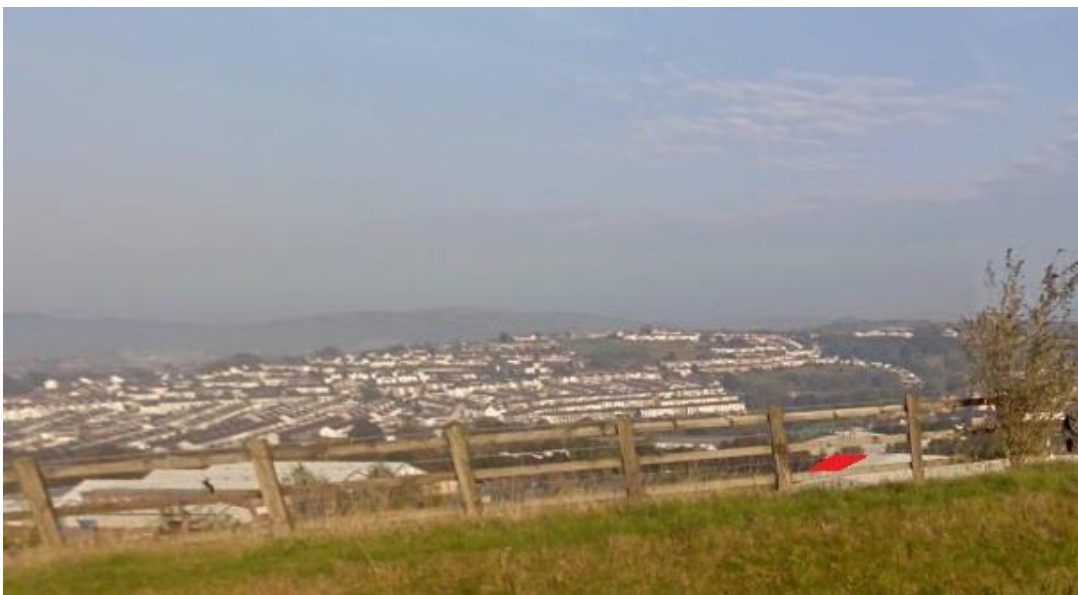
Being on the west side of the existing complex, the proposed location will be within an, unused, largely grassed area as can be seen above. The area had previously been ear-marked for future expansion.

Nevertheless this is a large building, and its place in the environment needs to be considered. Without forgetting of course that the building is wholly within an area set aside for industrial development which inevitably can require large buildings.

It is noted that the land on the other side of the valley is roughly at the same elevation as the proposal. However as can be seen below there is considerable screening of the whole Goat Mill Road industrial area. The view is taken from Balaclava Road and the proposal cannot be seen – the industrial building that can in fact be viewed is further west than the proposal.



The site can also be seen, just, from the A4060 to the south from a much higher elevation. As can be seen above, the impact can be considered as de minimis, especially considering the surrounding area and the fleeting nature of the view shown.



Notwithstanding that the land is within the ownership of the applicant, it is noted that the ecological value of the land will need consideration. In this context, it needs to be noted that the grassed area has been regularly mowed so its ecological value will be minimal. Thereafter it is noted that there is substantial tree planting in the vicinity. Fortunately much of this is beyond the site for the extension and so can be left untouched.

An Ecological Report has been commissioned and is included within the application documents. This notes the low ecological value of the site and makes recommendations (which will be followed) for some enhancements and a cautious approach to site clearance.

Further, there are 5 trees on the site of the extension and it is proposed to replace these adjacent to the entrance using species common to the area.

## 4.0 INTERPRETATION

There is therefore little that can be drawn from the site context to inform or determine the design of the extension (as it is not really visible, and in an industrial area, and has very little functional requirement) beyond respecting the form and materials of the existing building

## 5.0 DESIGN DEVELOPMENT

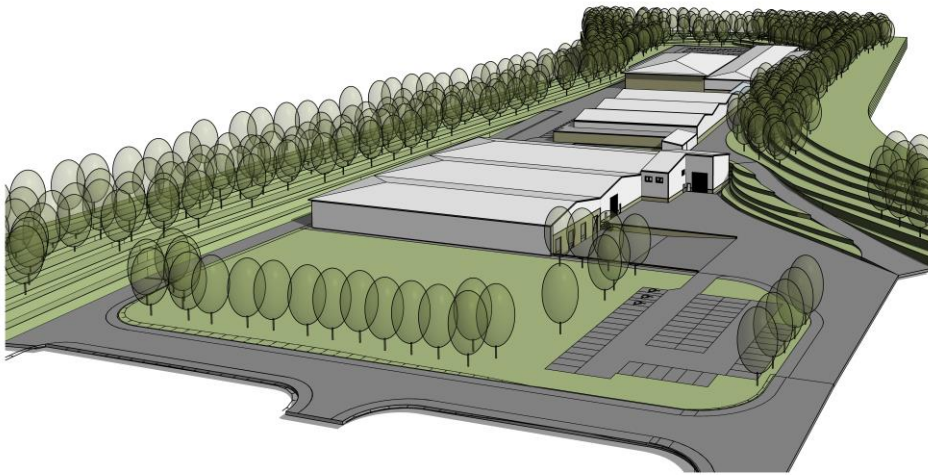
Therefore the principal influence on the design has been to respect the form and materials and design of the existing building, and make the extension appear as if it were constructed at the same time as the original.

## 6.0 SCHEME PROPOSAL

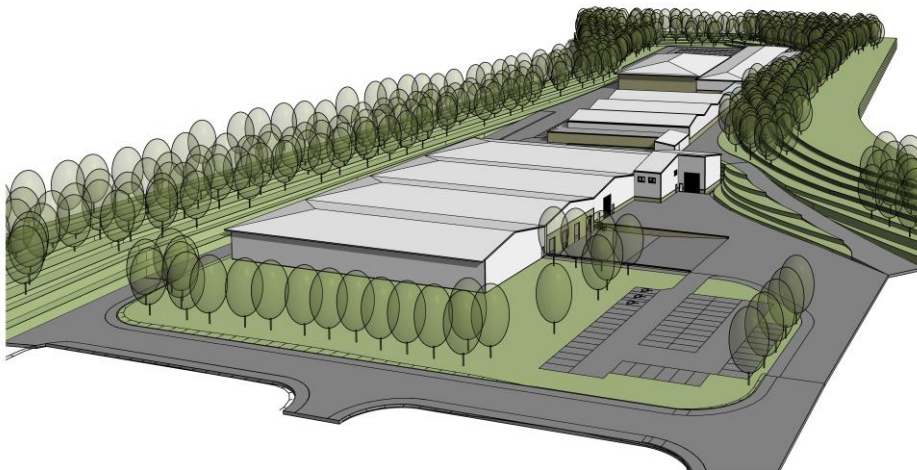
The images below show the materials and form of the existing structure that it is intended to replicate.



These computer-generated aerial views demonstrate that the extension will use the same materials and form, including silver cladding and matching blue gutters and downpipes.



Existing View



Proposed View

A Coal Mining Risk Assessment has been commissioned and this is included within the application documents, but shows no reason why the development should not proceed.

As part of our consideration the SI commissioned for the original development has been reviewed, which outlined the following points

- guidance for foundation design in relation to possible mine workings and coal/ironstone reserves
- confirmation that although some contamination is present, levels of these do not exceed safe thresholds, so should not be a concern
- information regarding drainage, although it is accepted that a SUDS system will need to be included for rainwater drainage, and details of this are included elsewhere within the application

Of course, threshold levels have changed and will need to be re-evaluated, so the SI will need to be extended. Further, as a SABS compliant drainage scheme will be needed, then the SI will need to be extended to cover this too. Nevertheless the exercise has demonstrated that there should not be any issues that would prevent development.

No further car parking will be provided. This is because the internal space of the complex has altered since it was first overhauled in 1995, and the processes are now much less labour intensive in the “office” areas and so existing car parking is grossly under-used. This applies to the top car park adjacent to the main entrance of the complex, and also to the car park adjacent to the new extension. This applies equally to cars motorized 2-wheel transport and cycles.

## **CHARACTER**

The proposal respects the character of the local area by providing a design that replicates the original, in form, materials and colour, which all replicate the existing building

## **ACCESS**

There will be no external access to the extension, which will only be accessed internally. With only internal access to the space, which will be at the same level as the existing building, then movement to, from, and within the building will be as the existing development.

## **MOVEMENT**

Given that this is an extension, then movement to and from the proposal will be as the existing development, which already provides good connectivity and promotes sustainable and active means of transport.

## **ENVIRONMENTAL SUSTAINABILITY**

As this is an extension to an existing building then there is a limit to how this can be affected.

The thermal performance of the fabric will be an improvement on the existing. Noting that an extension to an existing building will be better than a stand-alone building in terms of energy efficiency and minimising carbon emissions when the whole development is considered.

Further, a sustainable urban drainage system (SUDS) will be introduced to deal with rainwater run-off from the roof, and it is understood that an application for SABS approval will be needed.

## **COMMUNITY SAFETY**

The proposal will not affect this aspect of the development. Further it is noted that the development is virtually invisible from any residential area and that there are no public areas close to the proposal

## RESPONSE TO PLANNING POLICY

It is noted that this proposal is for a B2/B8 use and that such a change is covered by the following policies within the Meethyr Tydfil Local Development Plan 2016-2031. These are considered as follows and are discussed in turn

Policy SW4 – Settlement Boundaries

Policy SW11 – Sustainable design and Placemaking

Policy EnW1 – Nature Conservation and Ecosystem Resilience

Policy EnW2 – Internationally and Nationally Protected Sites and Species

Policy EnW3 – Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species

Policy EnW4 – Environmental Protection

Policy EcW2: Protecting Employment Sites

Policy EcW9: District Heating

Policy CW1: Historic Environment (Archaeological Sensitive Area and Landscape of Outstanding Historic Interest)

**Policy SW4: Settlement Boundaries To encourage development within urban areas, support the re-use of previously developed land, and to protect and support the functioning of our rural economy and the countryside, settlement boundaries will be defined as follows:**

**Primary Growth Area: • Merthyr Tydfil • Trefechan Other Growth Areas: • Troedyrhiw • Aberfan and Merthyr Vale • Quakers Yard, Edwardsville, Treharris and Trelewis • Bedlinog** Outside defined settlement boundaries, proposals will be regarded as ‘countryside development’ and will not be permitted unless the development:- • is for the purposes of agriculture or forestry; • is associated with rural enterprises or the winning and working of minerals; • is for the re-use, adaptation, or replacement of rural buildings and dwellings; • supports the expansion of an existing business in the countryside; • is for tourism, recreation

or leisure facilities or complementary development where the need for a countryside location is fully justified; • is for the provision of public utilities, infrastructure or waste management facilities that cannot reasonably be located elsewhere.

As the site is located within the Primary Growth Area, and is also part of an industrial zone within that area, then it is suggested that the proposal accords with this policy.

**Policy SW11: Sustainable Design and Placemaking Development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. Where appropriate new development will be required to:**

- 1. be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density;**
- 2. integrate effectively with adjacent spaces, the public realm and historic environment to enhance the general street scene and create good quality townscape;**
- 3. not result in an unacceptable impact on local amenity, loss of light or privacy, or visual impact, and incorporate a good standard of landscape design;**
- 4. contribute to the provision of green infrastructure, including open space in accordance with the Council's standards, sustainable drainage systems where appropriate, and ensure that the County Borough's network of green infrastructure is accessible and connected;**
- 5. allow access for the widest range of people possible, and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards;**
- 6. incorporate a range of inclusive/adaptable design specifications, a mix of house types, tenures and sizes to meet identified local needs;**
- 7. incorporate resource efficient/adaptable buildings and layouts using sustainable design and construction techniques;**
- 8. minimise the demand for energy and utilise renewable energy resources;**
- 9. provide and protect relevant utility services and infrastructure without causing any unacceptable environmental impacts;**
- 10. incorporate measures to improve ground and surface water quality wherever possible;**
- 11. provide adequate facilities and space for waste collections and recycling; and**
- 12. promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour.**

The previous comments and the drawn proposals show that these policies have been incorporated wherever possible. Therefore it is suggested that the proposal accords with this policy.

**Policy EnW1: Nature Conservation and Ecosystem Resilience Development proposals will be required to promote the resilience of ecosystems. In particular, proposals will be required to maintain and enhance biodiversity interests unless it can be demonstrated that: 1. The need for the development clearly outweighs the biodiversity value of the site; and 2. The impacts of the development can be satisfactorily mitigated and acceptably managed through future management regimes**

The bio-diversity of the site is currently limited but the proposals do include measures to increase this.

**Policy EnW2: Internationally and Nationally Protected Sites and Species Development likely to have an adverse effect either directly or indirectly on the conservation value of an internationally or nationally designated site, including the area, structure and function of designated features, will only be permitted where it is demonstrated that: 1. There is no suitable alternative to the proposed development; and 2. It can be demonstrated that the benefits from the development clearly outweigh the special interest of the site; and 3. Appropriate compensatory measures are secured; or 4. The proposal contributes to the protection, enhancement and positive management of the site. Development proposals likely to affect protected species will only be permitted where it is demonstrated that: 1. The population size, range, distribution and long-term prospects of the species will not be significantly adversely impacted; 2. There is no suitable alternative to the proposed development; 3. The benefits of the development clearly outweigh the adverse impacts on the protected species; and 4. Appropriate, avoidance, minimisation, mitigation, compensation and enhancement measures are provided.**

The Ecology Report commissioned for the site has demonstrated that there should be no adverse effect on Internationally and Nationally Protected Sites and Species

**Policy EnW3: Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species** Development proposals likely to have an adverse impact on Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves, or Priority Habitats and Species will only be permitted where it can be demonstrated that: 1. The need for the development clearly outweighs the conservation value of the site; 2. Adverse impacts on nature conservation features or geological features can be avoided; 3. Appropriate and proportionate mitigation and compensation measures can be provided; and 4. The development maintains and where possible enhances biodiversity and geodiversity interests.

The Ecology Report commissioned for the site has demonstrated that there should be no adverse effect on Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves, or Priority Habitats and Species

**Policy EnW4: Environmental Protection** Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either: • Pollution of land, surface water, ground water and the air; • Land contamination; • Hazardous substances; • Land stability; • Noise, vibration, dust, odour nuisance and light pollution; or • Any other identified risk to public health and safety. Where impacts are identified the Council will require applicants to demonstrate that appropriate measures have been incorporated to reduce, or minimise the impact identified to the lowest possible acceptable level. Planning conditions may be imposed or legal obligation entered into, to secure any necessary mitigation and monitoring processes. In respect of the water environment, development proposals will be required to incorporate measures to improve water quality where opportunities exist. With regard to flood risk, new developments will be expected to avoid unnecessary flood risk and meet the requirements of TAN 15. No highly vulnerable development will be permitted within Development Advice Map (DAM) zone C2. Development will only be permitted in areas at risk of flooding where it can be demonstrated that the site can comply with the justification and assessment requirements set out in TAN 15.

None of the issues listed will be relevant to this proposal. Further, it is noted that there is no residential development close by and that the scheme lies within an area which will not contribute to flooding

**Policy EcW2: Protecting Employment Sites** In order to protect the employment function of the County Borough's business and employment sites, development will be permitted at Rhydycar Business Park where:- • it falls within Use Class B1; or • it provides an ancillary facility or service that supports the primary employment use. At Pengarnddu, Pant Industrial Estate, Goatmill Road, EFI Industrial Estate, Cyfarthfa Industrial Estate, Triangle Business Park, Merthyr Tydfil Industrial Park, The Willows/ Abercanaid Industrial Estate, and at allocated employment sites, development will be permitted if:- • It is within Use Classes B1(b), B1(c), B2 or B8; or • It provides an ancillary facility or service that supports the primary employment use, or • It is an acceptable complementary commercial service outside class B uses, or • It is an appropriate waste management facility compatible with existing industrial and commercial activities. Development proposals for uses other than those stipulated and that would result in the loss of employment land / premises at the above sites will only be permitted where it can be demonstrated that the proposal would not lead to an unacceptable change in the nature of the employment site and where the existing use is inappropriate or the land / premises are surplus to the requirements of the employment market. At existing employment sites and premises outside the sites identified development proposals for non B-class uses that would result in the loss of the employment land / premises will be permitted where it can be demonstrated that the existing use is inappropriate or the land / premises are surplus to the requirements of the employment market. The proposed use is acceptable within the terms of the policy and is an extension to an existing use.

**Policy EcW9: District Heating** The use of combined heat and power (CHP), combined cooling, heat and power (CCHP) and district heating will be encouraged. Within the Heat Priority Areas listed below, major development will be expected to incorporate, where viable and technically feasible, infrastructure for district heating and to connect to existing systems where available. Developers should submit an energy strategy along with their application. The following are identified as Heat Priority Areas: • Project Heartland; • Goat Mill Road, and • Hoover Strategic Regeneration Area.

Given the location and nature of the scheme, being an extension, then there is no possibility of considering involvement in a District Heating Scheme

**Policy CW1: The Historic Environment** The integrity of our historic environment assets will be conserved and enhanced. Development proposals will only be permitted where it can be demonstrated they would preserve or enhance the architectural quality, character or the historic or cultural importance of our designated historic environment assets. Development affecting undesignated historic environment assets including, Locally Listed Buildings or structures, Landscapes of Outstanding Historic Interest in Wales, Urban Character Areas and Archaeologically Sensitive Areas should have regard to their special character and archaeological importance.

The proposals will not affect the Historic environment