

The Hoover Site
Pentrebach, Merthyr Tydfil

Planning Statement
Prepared on behalf of Walters Land Limited

Final – May 2025



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1 Introduction

- 1.1 This Planning Statement ('statement') has been prepared to support Walters Land Limited's ('Walters') outline planning application for the redevelopment of the former Hoover Factory at Pentrebach, Merthyr Tydfil ('the Site').
- 1.2 The vacant, previously developed site is a key development site in Merthyr Tydfil County Borough (MTCB) and is a key regeneration opportunity. Walters' proposals will provide for a quality development that provides modern new homes and jobs in a green environment, which is well connected to the wider local area and City Region.
- 1.3 The site forms a key element of The Hoover Strategic Regeneration Area (HSRA), which is a 59 ha site that is a focal point for regeneration policies in the adopted Local Plan (First Replacement Local Development Plan 2016-2031) and is crucial to the regeneration of Merthyr Tydfil. The HSRA includes the Site (the former Hoover factory site) as well as other large areas of brownfield land which together are anticipated to bring forward a key part of the LDP Strategy, accounting for 20% of the total housing requirement of the Plan; delivering additional benefits in the form of an improved Metro station at Pentrebach; and meeting plan objectives in regard to promoting the reuse of suitable previously developed land and supporting an integrated transport system.
- 1.4 Aside from the important delivery of new homes and employment areas, the Site (and a successful planning application) will facilitate fundamental infrastructure to support a successful development of the HSRA and will be key to delivering on the movement, design, landscape and wellbeing goals expected of it through the hierarchy of planning policies that support its development.
- 1.5 The proposals contained within the application have evolved through extensive consultation and dialogue with the local authority.
- 1.6 The application is seeking outline planning permission for a mixed-use development scheme with the following description:

'Demolition, ground reclamation and remediation and outline planning application with all matters reserved (except for the main access points) for the comprehensive redevelopment of the former Hoover site to create a new neighbourhood, including up to 441 new homes, 1.5 hectares of employment land (including B1 (business), B2 (general industrial), B8 (storage and distribution) and sui generis uses), community hub (including A1 (shops), A2 (financial and professional services) A3 (food and drink), B1 (business), D1 (non-residential institutions) and sui generis uses), community heat hub, metro station and transport hub (including transport interchange and parking), a network of open spaces (including parkland, active travel routes, areas for informal recreation and SUDS attenuation features) together with associated works, including improvement/works to the highway network.'

- 1.7 Through its team of consultants, Walters has undertaken a comprehensive assessment of the site and the application proposals. This statement considers the main planning issues related

to the application proposals and supports a number of other statements and assessments that have been prepared to demonstrate the site's potential and acceptability. These include:

- A Design and Access Statement ('DAS') prepared by Hammond Architectural Ltd.
- A Transport Assessment ('TA') prepared by Apex Transport Planning Ltd.
- A Site Investigation and Outline Remediation and Reclamation Strategy prepared by Integral Geotechnique
- A Drainage Strategy & Flood Consequences Assessment prepared by Quad Consult
- Preliminary Ecological Appraisal prepared by Sylvan Ecology
- Green Infrastructure Statement prepared by TDA
- Tree Survey prepared by Treescene
- Noise and Vibration Assessment prepared by Hunter Acoustics
- Heritage Assessment prepared by EDP
- Coal Mining Risk Assessment prepared by Integral Geotechnique

1.8 These documents are based on an illustrative Development Framework Parameter Plan prepared by Hammond Architectural Ltd. This plan, which explains the development concept for the site, is included with this application and is also included in the DAS. A full explanation of the masterplan and the rationale behind it is also included in the DAS.

1.9 This statement is structured as follows:

- Section 2 provides a description of the site and surrounding area and provides a commentary on its recent planning history;
- Section 3 provides details of the proposed development, including feedback received from pre-application discussions with the Council;
- Section 4 sets out a headline overview of the key planning policy relevant to the proposals;
- Section 5 analyses how the proposals meet the planning policies identified in Section 4 and sets out why the proposals are acceptable; and
- Section 6 provides a summary of the benefits of the scheme and conclusions.

2 The Site, its Surroundings and Relevant Planning History

- 2.1 The Site comprises the Hoover Factory site, located at the north end of the village of Pentrebach, but within industrial estates situated at the southern end of Merthyr Tydfil.
- 2.2 The site is located on the west of Merthyr Road, the site centre coordinates being 305701mE; 204213mN and the nearest postcode being CF48 4TU.
- 2.3 The Site is bound to the west by a railway line, with the River Taff immediately beyond to the west; to the north by a modern roundabout where Pentrebach Road meets Merthyr Road; to the east by Merthyr Road and Triangle Business Park Road; and to the south by Triangle Business Park, Pentrebach Roundabout, A4054 and Pentre-Bach station.

The Site

- 2.4 The Site is approximately c.15.93 hectares (ha) in extent.
- 2.5 The site is relatively flat in nature with pronounced terracing stepping down in a southerly direction from 159m AOD to 149m AOD.
- 2.6 The Site boundary contains three separate previously developed land parcels, which comprise the main factory site to the west of Merthyr Road and two smaller parcels to the east of Merthyr Road on commercial land located in Triangle Business Park.
- 2.7 The main site area comprises the former Hoover Candy manufacturing plant including the manufacturing plant to the south and the assembly plant to the north with an access road to separate the two plant buildings.
- 2.8 The southern area of the site includes a disused bowling green, pavilion and cricket pitch. In between the bowling green and Pentrebach station is an area of rough ground which is used for storage. Another storage area is located to the north of the bowling green at the location of former tennis courts.
- 2.9 A helipad is located on the northern edge of the cricket pitch.
- 2.10 A car park, former social club and gatehouse is located in between the cricket pitch and the Hoover manufacturing plant area. A new storage building which was formerly a polystyrene plant lies to the west of the car park and the social club.
- 2.11 Overhead power lines cross the northern end of the site.

Access & Drainage

- 2.12 The site is accessed via the Merthyr Road, with main vehicular access points at the Pentrebach Road and on Merthyr Road itself.

- 2.13 Access roads run from the site entrance via Merthyr Road to the east. The access roads follow the external areas of the plant and are typically in a poor state of repair.
- 2.14 The site is serviced with main utilities infrastructure and both a surface and foul water drainage network.

Historic/Previous Uses

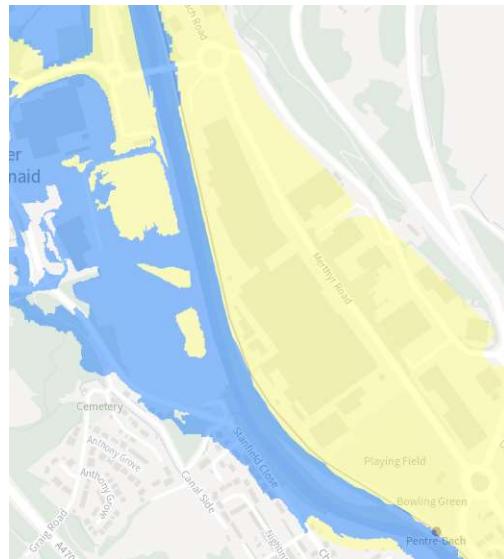
- 2.15 The historic industrial uses of the site are recognised, recorded and assessed within the various site investigations that support the planning application, with the full recognition that appropriate remediation strategies will be required to make the site suitable for housing and the other uses proposed.

Ecological Context

- 2.16 The site is mainly comprised of several large buildings and areas of hard standing. Multiple small buildings are located throughout the site. Around the site boundaries are scattered broadleaved trees, scrub and semi-improved grassland. The cricket ground has a large area of amenity grassland, bare ground, two buildings and areas of scrub, woodland and introduced shrubs. The smaller site is an old car park comprised mainly of hard standing with borders of scrub and woodland. The smallest site is located to the south of this site. It comprises two buildings, hard standing and boundaries of scrub and woodland.
- 2.17 There is one statutory and 13 non-statutory designated sites within 2km of the application site. The River Taff SINC is located directly adjacent to the western site boundary.
- 2.18 The key ecological features on site are the buildings, scattered broadleaved trees and the broadleaved woodland. This habitat is considered to be of moderate ecological value at Local level. The remaining habitats, including the semi-improved grassland, are considered to be of low ecological value at Site level.
- 2.19 The Sylvan Ecology PEA assesses the likelihood of protected species being present within the site or effected by the proposed development, concluding that only Bats require further assessment. No other protected species are likely to be present within the site.

Flood Risk Context

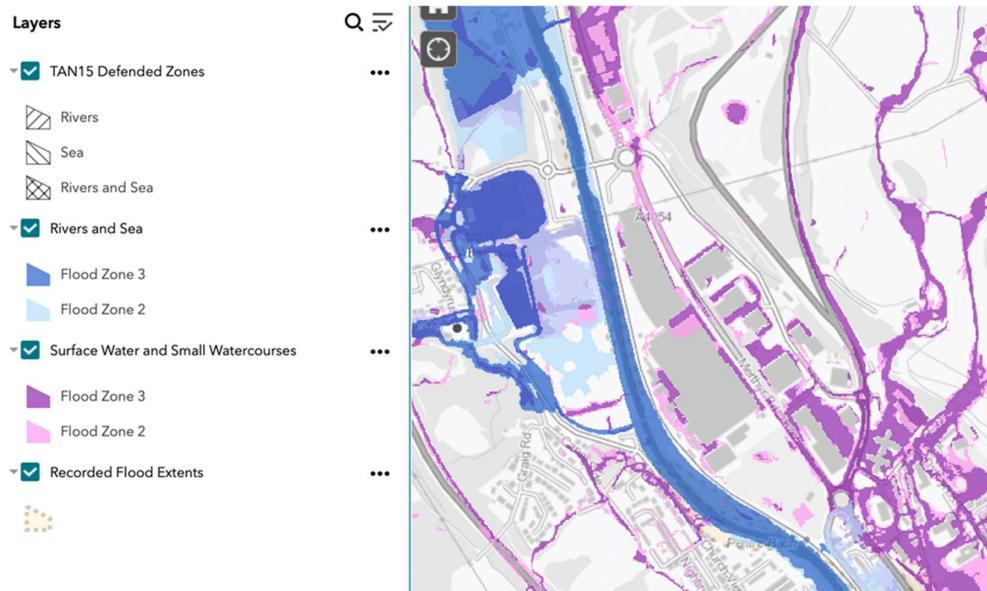
- 2.20 The site previously fell within Zone B (Areas known to have been flooded in the past evidenced by sedimentary deposits) as defined by the Development Advice Maps (DAM) published by NRW to support TAN15 (previous version).
- 2.21 An extract from the DAM is provided below, which also shows land west to the boundary railway line (outside the site) being within Zone C2 (Land without significant flood defence infrastructure)



Extract from previous Development Advice Map

2.22 Whilst TAN 15 has very recently been superseded (31 March 2025), which also means that the DAMs are no longer applicable, the above provided important context as it was relevant and in force when the allocation was justified and subsequently made through the RLDP.

2.23 The Flood Map for Planning and the Flood Risk Assessment Wales (FRAW) map together make up the Wales Flood Map. The Flood Map for Planning (FMfP) is the starting point for consideration of flood risk in the planning system. The map uses flood zones to indicate the degree to which land is at risk of flooding from rivers, the sea, surface water and small watercourses. An extract from the FMfP is provided below.



NRW Flood Map for Planning

2.24 The extract above shows that the site is not at risk of flooding from rivers or the sea, but there are pockets of land within the site that are at risk from surface water flooding. Whilst the vast majority of the site lies within Zone 1, small pockets within the site could be subject to minor flooding as a result of inundation or blockage of the storm network which could be expected on a site of this size with localised flat areas.

Trees

2.25 The arboricultural surveys show that whilst the site is bordered by a range of good quality trees which provide amenity and biodiversity value, the trees within the main body of the site are limited to being contained within the open space and former staff amenity areas within the southern element of the site.

Planning History

2.26 The site has an extensive planning history associated with the previous, longstanding use of the site as a factory complex and the ancillary uses associated with it. Whilst the site's past use is significant to its condition and to the context that it sits within, the site's detailed planning history is of limited significance to the proposed development.

2.27 Planning history on the Site is recorded on the MTBC website as follows:

- Change of use of vacant land to car sales with associated office accommodation Ref. No: P/07/0668 | Status: Full Approval
- Erection of football stand for standing spectators Ref. No: P/98/0467 | Status: Full Approval
- Re-building of packaging building. Ref. No: P/03/0085 | Status: Full Approval
- Provision of a Hut to display Cricket Scores Ref. No: P/01/0221 | Status: Full Approval
- Structural repairs to piers and main entrance to offices. Ref. No: P/00/0061 | Status: Full Approval
- Construction of car park with associated footpaths and access ramps. P/03/0587 | Land to Northeast of Pentrebach Railway Station Pentrebach Road Merthyr Tydfil. Status | Full Approval

2.28 There is a great deal of planning history associated with the wider HRSA, including changes of use and minor works to the Willows/Abercanaid Industrial Estate which is not considered relevant to this application. Land to the west of the application site (separated by the Taff and the railway line) has some relevant history as follows:

- Demolition of former Hoover / Candy office block and footbridge Ref. No: P/16/0039 | Status: Approval not Required
- Residential and business (Use Class B1) development Ref. No: P/17/0144 | Status: Withdrawn
- Engineering works including provision of drainage channel/swale and culvert/outflow, raising the level of the land and creation of site access road. Ref. No: P/20/0025 | Status: Full Approval
- P/23/0053 | Residential development (200 units), engineering works, access formation, landscape, drainage and associated works | Dragon Park Abercanaid Merthyr Tydfil | Status: Full Approval

2.29 Most significant of the above is the full approval for 200 residential units granted in 2023, which provides for the first residential development within the HSRA.

3 The Proposed Development

- 3.1 The HSRA is a key development site in MTCB and is a key regeneration opportunity. The planning application is proposed to facilitate a high-quality mixed-use development for a core site of the HSRA that will provide modern new homes and jobs in a green environment, and which is well connected to the wider local area and City Region.
- 3.2 The application is seeking outline planning permission for a mixed-use development scheme with the following description:

'Demolition, ground reclamation and remediation and outline planning application with all matters reserved (except for the main access points) for the comprehensive redevelopment of the former Hoover site to create a new neighbourhood, including up to 441 new homes, 1.5 hectares of employment land (including B1 (business), B2 (general industrial), B8 (storage and distribution) and sui generis uses), community hub (including A1 (shops), A2 (financial and professional services) A3 (food and drink), B1 (business), D1 (non-residential institutions) and sui generis uses), community heat hub, metro station and transport hub (including transport interchange and parking), a network of open spaces (including parkland, active travel routes, areas for informal recreation and SUDS attenuation features) together with associated works, including improvement/works to the highway network.'
- 3.3 The development concept that the application is based on is explained in full detail in the accompanying DAS. This document also describes how the masterplan for the site has evolved and the key principles and parameters it is based on. For the purposes of this planning statement, the outline planning application proposes the extensive regeneration of the site to deliver on the ambitions of the HSRA.
- 3.4 At this stage, all matters, aside from the main access are reserved, although substantial progress has been made on a number of key issues including internal circulation, landscaping and open space (which will form the green grid that new development will sit within).
- 3.5 The Development Framework Plan and a series of parameter/indicative plans are provided to demonstrate how the site can be developed and deliver upon the planning policy and underpinning masterplanning work that has been undertaken.
- 3.6 The proposed development can be described under a series of key headings as follows.

Site Preparation

- 3.7 The application seeks consent for demolition of all existing structures, followed by land remediation. These are set out in detail within the accompanying Site Investigation and Outline Remediation and Reclamation Strategy, but in summary these works would comprise the following:
 - Demolition and removal of the existing buildings
 - Excavation of the existing factory and other building slabs, removal of buried foundations and disused services including the out of use drainage manholes and conduits

- Post demolition supplementary site investigation works to confirm the previous findings and investigate previously inaccessible areas of the site
- Excavation of made ground
- Processing the excavated materials by removing visually unacceptable materials such as former pipework, tanks and vessels which may contain hazardous substances
- Placing back the acceptable excavated materials and compacting these in layers in accordance with the specification for Highway Works
- Following demolition of the remaining above ground structures, and breaking out of floor slabs, supplementary site investigation works would be carried out to investigate previously inaccessible areas of the site, and supplement/confirm the previous site investigation works.

3.8 In conjunction with the remediation works additional enabling works will be required. These enabling works will include:

- Site clearance works
- Potential ecological works
- Site wide geotechnical and geo-environmental works including earthworks
- Temporary boundary fencing to secure site
- Works adjacent to public highway and access (kerb realignment, footpath, crossing)
- Relocation or protection (including exclusion zone) of any underground services which cross the site.

3.9 It is envisaged that the required works will be split into two parts. Firstly, remediation, reclamation and enabling works will be required to prepare a suitably remediated surface suitable for development. Secondly, upon completion of the development works, an imported clean capping layer placed over a hi-vis geotextile separation membrane is envisaged in all gardens and areas of soft landscaping.

3.10 The reclamation and remediation works would prepare the site to a standard that would be suitable for the proposed residential development.

3.11 To minimise risks to controlled waters, infiltration in (or hydraulically above) previously developed/contaminated areas of the site should be minimised.

3.12 The remediation and reclamation works will be subject to engineering and geo-environmental monitoring with chemical and geotechnical testing carried out to the development plateau areas.

3.13 On completion of the works, specific validation reports up to the remediated surface will be issued for regulatory approval.

Uses

3.14 As per the description, the application will facilitate, through subsequent reserved matters approvals:

- Up to 441 new homes, with a mix of tenures (subject to end users and an appraisal of viability).

- 1.5 Ha of new employment land – the permission seeks flexibility for a range of Class B and *sui generis* employment uses.
- A community hub – flexibility is sought for a range of uses to including A1 (shops), A2 (financial and professional services) A3 (food and drink), B1 (business), D1 (non-residential institutions) and other suitable *sui generis* uses.
- Safeguarding land and access for a new Metro Station.
- A Transport Hub to include a transport interchange and parking.
- A community heat hub.
- Supporting landscape, new active travel connections, infrastructure, sustainable drainage and open spaces.

Access, Active Travel and Connectivity

3.15 Vehicular access to the main western parcel will be obtained from Merthyr Road (A4054) via two new right turn lane priority junctions. The smaller employment parcel will retain access from the existing locations onto the Triangle Business Park Road.

3.16 The employment land to the east of Merthyr Road would be accessed from the two existing access points onto the Triangle Business Park Road. The small parcel for the community heat hub would be accessed through the Triangle Business Park as it benefits from an existing right of way.

Layout and character areas

3.17 The DAS provides a great deal of information around the site's layout and the character areas to be established through the Development Framework Parameter Plan and through the future reserved matters applications.

3.18 Sections 13 to 16 of the DAS set out a full description of the layout and character areas proposed, and how they have been derived following a thorough review of the site's context characteristics, opportunities and constraints.

Landscape and Open Space Strategy

3.19 The landscape strategy for the development has been shaped by the site's physical characteristics, surrounding context, and aspirations for a high-quality, well connected and multi-functional public realm. A network of linked open spaces, green corridors and planted areas will define the structure and character of the development, contributing to biodiversity, surface water management, and the creation of a distinctive sense of place.

3.20 Section 14 of the DAS provides a full description of the Green and Blue Infrastructure elements of the proposal.

Drainage

3.21 Conveyance of runoff will be overland where possible with primary surface water attenuation being provided within detention basins (underlain with cellular storage) situated strategically

across the site.

- 3.22 The surface water drainage strategy will comply with SAB/SuDS protocols and work within the site layout and constraints of the proposed development. An indicative capacity layout illustrates space for attenuation and roadside conveyance over much of its length with opportunities to incorporate porous pavements within private roads, access ways and parking zones.
- 3.23 The general fall of the proposed development will be north to south with a gentle incline towards the western boundary. This will present good opportunities to reinforce the 'green corridor' proposed along the western boundary with the rail line with swales and bioretention strips that link back into the detention basins and site in general to encourage biodiversity and amenity well into the development. This zone also presents a valuable function for flood routing (if ever required) in extreme storm events by directing exceedance flows away from the properties. The 'green corridor' could also incorporate a small raised 'bund' area to prevent flows exiting the site towards the rail line, routing them in a southerly direction back towards the main road and River.

Pre-Application Discussions

- 3.24 The proposals have been the subject of pre-application discussions with the planning and highways officers. This is summarised within section 12 of the DAS, which also sets out how feedback has shaped the scheme.
- 3.25 A statutory Pre-Application Consultation has been completed, with the full results documented in the accompanying PAC report. References to consultation responses are set out in the following sections where relevant to the topics being discussed.

4 Planning Policy Overview

4.1 This section sets out a high-level overview of the planning policy context that is relevant to the site and the proposals.

4.2 A full analysis of the pertinent policies is undertaken in the next section on a topic-by-topic basis.

4.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this planning application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February 2021);
- Merthyr Tydfil Replacement Local Development Plan (RLDP) was adopted in January 2020

4.4 In addition to the Development Plan, the application has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 12 (July 2024)
- The Well-Being of Future Generations (Wales) Act 2015
- Technical Advice Notes;
- MTCBC Supplementary Planning Guidance.
- Hoover Strategic Regeneration Area Framework Masterplan Document June 2018

The National Development Framework (NDFFW)

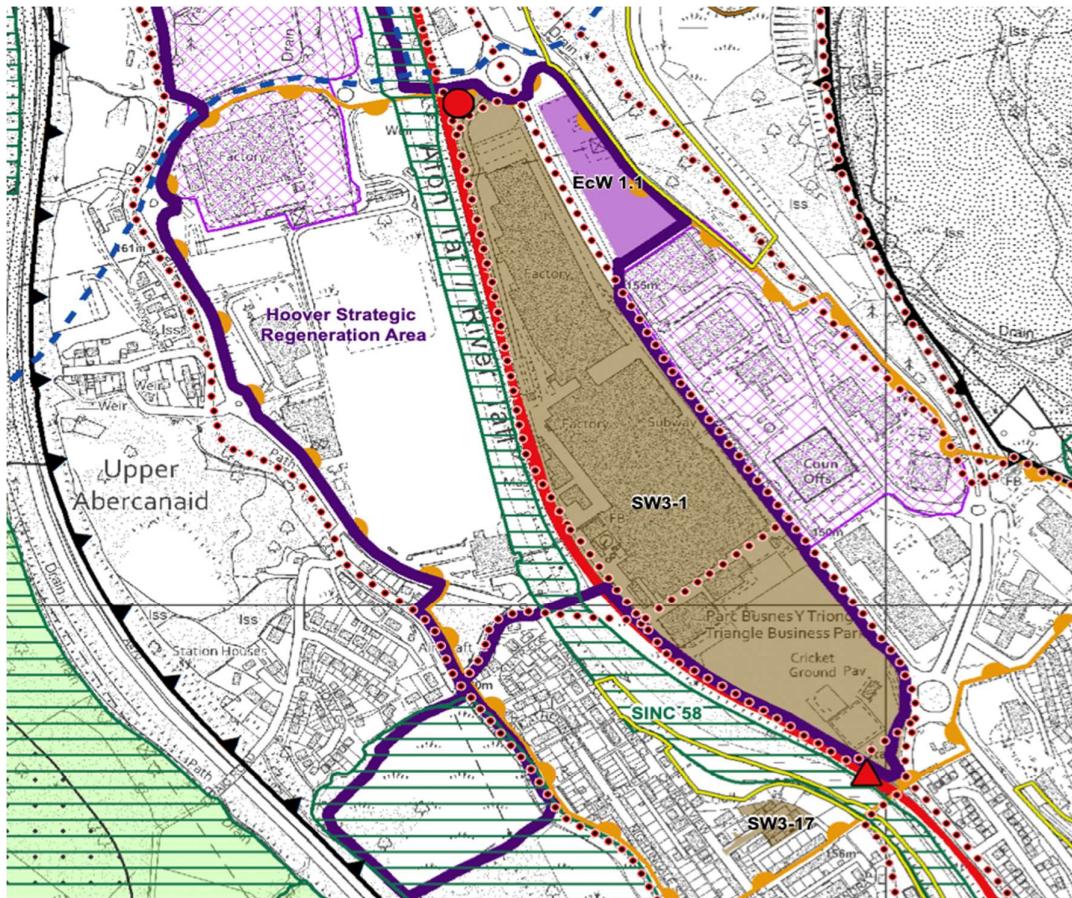
4.5 The National Development Framework: Future Wales – the National Plan 2040 (NDFFW) was published on 24th February 2021. It has Development Plan status, setting the direction for development in Wales to 2040. It sets a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

4.6 The NDFFW has been designed incorporating the principles of sustainable development at its core. This comes as a result of the Well-being of Future Generations (Wales) Act 2015 ('the Act') that gives a legally-binding common purpose – the seven well-being goals – to the public sector to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.

4.7 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time.

Merthyr Tydfil Replacement Local Development Plan (RLDP)

- 4.8 The RLDP was adopted on 29th January 2020 and is the prevailing development plan for the site, containing as it does, detailed allocations and development management policies.
- 4.9 An extract from the proposals maps covering the Site is set out below:



LDP Proposals Map Extract

- 4.10 The site is located within the Settlement Boundary and is within the Hoover Strategic Regeneration Area as defined by RLDP Policies SW6.
- 4.11 Policy SW-3 covers the main body of the Site, with EcW 1.1 covering the area proposed for employment. The area shown for the potential for a community heat hub lies within a Protected Employment Site (EcW2).
- 4.12 SW3: sustainably distributing new homes identifies the site as the Hoover factory site, suitable for 440 dwellings with an indicative delivery timescale of between 2024 and 2031.

4.13 Party SW6: Hoover strategic regeneration area identifies the site as part of the HSRA. The HSRA is identified to facilitate a major mixed-use development comprising:

- 440 new homes,
- Local retail provision of 400 sqm,
- New employment development on 1.5 hectares of land,
- Pentrebach Station Park and Ride,
- Provision of a new footbridge/cycle bridge to Abercanaid,
- Safeguarded land for a new Metro station, and
- A minimum of 1.79 ha of open space.

4.14 Development proposals will be required to incorporate a number of sustainable placemaking design principles, explored in the next section.

4.15 The site is crossed by a Proposed Active Travel Integrated Network Map Route (policy SW 12). The southern tip of the site is affected by a safeguarding of land for proposed Station Park and ride (policy SW6 and SW 12). The northern tip of the site is affected by a safeguarding of land for potential new Metro Station (policy SW6 and SW 12).

4.16 The site is also within a heat priority area as defined by policy EcW9. The River Taf to the western boundary is a SINC.

4.17 The LDP Constraints Map shows the flood risk at the site as Zone B as defined with the TAN:15 development advice maps.

4.18 The following table summarises the relevant development management policies against which the proposals are assessed in the following sections.

Policy Reference	Policy Title
SW1	Provision of New Homes
SW3	Sustainably Distributing New Homes
SW4	Settlement Boundaries
SW6	Hoover Strategic Regeneration Area
SW9	Planning Obligations
SW10	Protecting and Improving Open Spaces
SW11	Sustainable Design and Placemaking
SW12	Improving the Transport Network
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
EcW9	District Heating
EcW1	Provision of Employment Land
EcW2	Protecting Employment Sites

5 Planning Appraisal and Assessment against Planning Policy

- 5.1 Having described and set out an understanding of the Site, its history and surroundings, along with an explanation of the proposed development and the planning policy context in previous sections, this section sets out how the development proposals have been guided by and accord with all levels of planning policy.
- 5.2 The development is proposed in accordance with the site allocation within the adopted RLDP. The RLDP in turn is informed by national policy and guidance and was found to be in accordance with the requirements of the Well-Being of Future Generations (Wales) Act 2015, hence only a headline review of national level policies is necessary. This is set out on a headline basis before considering RLDP policy compliance on a topic-by-topic basis.

The NDFFW

- 5.3 The NDFFW sets out a strategic growth strategy for Wales under Policy 1 -Where Wales will Grow. The Site is considered to lie within one of the three defined National Growth Areas, being within Cardiff, Newport and the Valleys.
- 5.4 Placemaking forms a key concept upon which many national planning policies are based. The proposals area considered to accord with Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking as they will help to:
 - Create a rich mix of uses;
 - Provide variety of housing types and tenures (subject to viability);
 - Create a place with a walkable scale, with homes, local facilities and public transport within walking distance of each other;
 - Increase 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;
 - Integrate green infrastructure,
- 5.5 Policy 7 – Delivering Affordable Homes sets out an aspiration to increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. The development will explore all opportunities to increase the supply of affordable housing.
- 5.6 Policy 9 refers to green infrastructure and biodiversity enhancement. The proposals are compliant on a strategic level by safeguarding existing ecological networks ensuring that they are not unduly compromised by future development; and will provide for new green infrastructure, securing sustainable growth, ecological connectivity, social equality and well-being.
- 5.7 The proposal delivers fully with the NDFFW emphasis on the importance of requiring development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices, given that it will facilitate new active travel and enable strategically important public transport infrastructure.

Well-being of Future Generations (Wales) Act 2015

5.8 The 7 wellbeing goals of the Act have been considered at length in the various stages of identifying the need to regenerate the site, through the RLDP and supporting document, including the HSRA Masterplan.

5.9 Bringing forward a core site to the HSRA will accord with the 7 goals as follows:

- A prosperous Wales - The masterplan provides the basis for the provision of new homes and jobs within a green setting. Development will harness environmental features to reduce impacts, while providing a high-quality place to live and work.
- A resilient Wales - The development will help to improve the economic, social and environmental resilience of the area, and better equip it to respond to future needs.
- A healthier Wales - It will provide new homes and jobs that are critical to health and well-being. The approach placed on green infrastructure and Active Travel will provide opportunities for recreation that would help the physical and mental well-being of residents and workers.
- A more equal Wales - The development will provide the basis for the provision of new jobs and homes for local people. The rail connections will ensure that the development will be well-connected to the wider Capital City Region.
- A Wales of cohesive communities - The development will create an attractive and safe mixed-use neighbourhood that will provide equal opportunities to people from all backgrounds.
- A Wales of vibrant culture and Welsh language- The development will reflect the cultural history of the site and will not threaten the Welsh Language.
- A globally responsible Wales - The provision of new homes and jobs in a green setting will improve the well-being of Wales without any undue impact on global well-being.

Planning Policy Wales (12th Edition, July 2024)

5.10 Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

5.11 The RLDP was formulated under a previous version of PPW, albeit that the key themes and emphasis on placemaking have not changed under the most recent edition. These principles are carried forward into the RLDP polices and as such are more appropriately assessed under the topic-based review that follows. In brief, the SW3-3 and SW6 allocations already take on board the key principles of PPW as:

1. Developing the Site is a result of making sound strategic and spatial choices. The Site is previously developed. The location of the Site inherently accords with the requirements to deliver the placemaking principles given the strategy and selection process undertaken through the RLDP.

2. It will deliver an active and social place. The Site affords opportunities for active travel which is a cornerstone of the transport policy for Wales. It is also ideally placed to take advantage of existing public transport infrastructure, and it will enable strategic improvements benefiting the wider area.
3. It has the ability to deliver a distinctive and natural place through the green infrastructure in built into the scheme and through protecting and enhancing green infrastructure and ecological networks.

5.12 Paragraph 6.4. of PPW states that the planning system must ensure development results in a net benefit for biodiversity and ecosystem resilience to enhance well-being. This is discussed under the relevant topic area below.

5.13 Other themes and policies set out within PPW are assessed in the following paragraphs.

5.14 Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:

TAN 2: 'Planning and Affordable Housing' (June 2006)
TAN 5: 'Nature Conservation and Planning' (September 2009)
TAN 10: 'Tree Preservation Orders' (October 1997)
TAN 12: 'Design' (March 2016)
TAN 15: 'Development and Flood Risk' (2004)
TAN 18: Transport (2007)

The Principle of Development

Policies relevant to this topic: NDFFW, PPW, SW1 SW3-1, SW4 SW6, EcW1 EcW2 SW10

5.15 The principle of development of this site, in the manner proposed, is fully supported at all levels of planning policy and guidance.

5.16 It is a previously developed site in a growth area which is supported under the NDFFW and PPW to deliver new homes in suitable locations whereby placemaking principles can be fully applied.

5.17 It is in a location that has been identified as suitable in delivering on the strategic requirements of the RLDP for new housing and regeneration.

5.18 It is allocated for housing and other mixed-use development within site specific allocations of the RLDP.

5.19 The following topic covers all the requirements of the site-specific policies, which themselves have been through examination as part of the adoption of the RLDP.

- 5.20 The principle of housing development on the main body of the site is supported through SW3 and SW6. Employment land will be delivered in accordance with policy ECW1, and land for the community network/hub will be delivered on employment land which does not conflict with the requirements of policy ECW2 and is supported by ECW9.
- 5.21 The site includes a disused sports ground and associated buildings, built by Hoover as a facility for factory staff. This has only been let on short-term leases in recent history, with the full knowledge that the site will be developed for the allocated purpose in the short to medium term.
- 5.22 Whilst policy SW10 seeks to protect existing open spaces and sports pitches, policies SW3-3 and SW6 make no reference to the need to retain the sports pitch. The need (or lack of) to retain the on-site sports pitch was considered during the allocation of the site and at the RLDP examination, with the Inspector considered this point specifically in their report, stating:

6.12. It is evident that the existing sports ground within the Hoover Factory site has been maintained for several years by volunteers and is used by both national and local cricket teams and clubs. National policy states that playing fields, whether private or publicly owned, should be protected from development other than in certain circumstances, for example where there is an excess of such provision in the local area. In this case, the loss of the sports ground would not lead to a deficiency in outdoor sports areas and pitches as Plymouth ward has adequate provision relative to the population. The Hills Plymouth Cricket Club, for example, lies a short walk east from the Hoover Factory ground. I also note that there is no objection to the loss of the Hoover Factory sports ground from the Sports Council for Wales or Fields in Trust, whom the Community Involvement Scheme identifies were consulted during the Plan's production. I find the loss of the sports ground to be justified by the evidence.

- 5.23 The re-use of this previously developed site, involving the replacement of the existing land uses by housing led regeneration and supporting infrastructure is fully supported at all levels of planning policy and guidance.

Delivery of Placemaking Principles (including the requirements of the site allocations and accordance with masterplanning principles/requirements)

Policies and guidance relevant to this topic: PPW, TAN 12, SW3-1, SW6, SW11, CW1, EcW9, Hoover SRA Masterplan

- 5.24 Policies SW3-3 and SW6 set the land use requirements and placemaking principles expected of the site.
- 5.25 Policy SW3-3 allocates part of the site for 440 dwellings towards the LDP strategy. The application proposes up to 441 new dwellings. Whilst the policy capacity figure is not considered to be an upper limit, the additional unit proposed is not considered material.
- 5.26 Policy SW6 set out the main placemaking principles that development with the HSRA is expected to deliver. Drawing upon the comprehensive explanation of the scheme, the evolution of the design and the masterplanning principles set out in the DAS. The DAS

demonstrates that the scheme responds very well to the general obligation on all developers to achieve high quality new development which reflects local context and improves our urban areas, as set out under RLDP policy SW11.

- 5.27 The DAS explains in some detail how the scheme has evolved and the assessments, principles and objectives it is based upon. It also sets out the vision, site analysis and parameters of the masterplan. This responds positively to the site's urban neighbouring uses (to the north, east and south) and the natural environment (that borders the site to the west), together with the site's key features.
- 5.28 This context has guided the form and content of the scheme. The DAS sets out the different stages to the evolution of the masterplan and shows how the project will transform the appearance and performance of the whole site and create a safe, attractive, high quality accessible and convenient environment. The fact that the scheme is based on new housing means that the proposals can retain and enhance the best parts of the site, whilst positively considering the conditions of those living close to it.
- 5.29 The DAS also provides evidence of the quality of the development that Walters propose. The following table provides a colour coded assessment of how the proposals address SW6, through cross referencing the comprehensive site appraisal and design justification set out within the DAS.
- 5.30 Compliance is coded as green whereby the Development Framework Parameter Plan either specifically addresses the policy requirement or where it will facilitate future provision through the detailed reserved matters applications. It should be borne in mind that SW6 covers a much wider area than the application site, and the site cannot be relied upon by itself to deliver all the requirements

Policy Requirement		Compliance
Land Use	440 new homes	Up to 441 new homes to be developed
	Local retail provision of 400 sqm,	The community hub will provide for local retail facilities
	New employment development on 1.5 hectares of land,	Provided for on land east of Merthyr Road (1.5ha)
	Pentrebach Station Park and Ride	This is proposed as part of the transport interchange - appropriate parking provision will form part of this area.
	Provision of a new footbridge/cycle bridge to Abercanaid,	Land is safeguarded within the masterplan to allow for a future bridge link
	Safeguarded land for a new Metro station, and	Provided for within the masterplan

Policy Requirement		Compliance
	A minimum of 1.79 ha of open space.	Provided for within the masterplan
Movement	Integrate a park and ride at an upgraded Pentrebach Metro station that acts as an attractive gateway to the HSRA and Merthyr Tydfil.	Provided for within the masterplan
	Integrate the existing railway via a green landscape corridor, and safeguard land for a future Metro station in the north of the HSRA.	Provided for within the masterplan
	Create a legible environment through a clear hierarchy of streets that is reinforced by landscaping and the built form.	Provided for within the masterplan
	Create a network of pedestrian and cycle routes within the development that improves connections and wayfinding to existing strategic recreational routes (Taff and Trevithick Trail) and provide links within the site and to surrounding areas, including connecting the site across the river through a new bridge for pedestrians and cyclists.	Provided for within the masterplan
Development	Provide for a range of dwelling types to satisfy local needs, while also delivering the plan strategy to develop a new sustainable mixed-use community	Mix to be determined at RM stage, but a full mix is allowed for within the masterplan.
	Deliver a sufficiently high-density development, as appropriate, adjacent to a Metro station.	Density provided in accordance with the policy requirement.
	Provide a reconfigured public realm to better integrate Pentrebach railway station to the HSRA.	Provided for within the masterplan
	Incorporate retail uses to provide for local need and increase natural surveillance over Metro facilities, with the potential for a focal civic square.	The transport hub and the site layout shown on the masterplan will fulfil this function by providing for and encouraging surveillance.
	Deliver distinctive character areas which create a sense of place.	As demonstrated within the DAS
	Provide employment zones that can accommodate a range of employment types and are adaptable to future need.	Provided for within the masterplan
	Reflect the cultural heritage of the site in the design of new development, including reflecting the Hoover Factory frontage in the built form, and drawing upon historic built forms such as terraced dwellings.	See DAS sections 10 & 15

Policy Requirement		Compliance
	Create a distinctive and unique environment that can act as a flagship development incorporating high levels of sustainability including, where viable, building integrated renewables, district heating systems, the appropriate re-use of existing employment buildings/land and use of sustainable materials and construction.	See DAS sections 10 to 20.
Green Infrastructure & Open Space	Establish a green perimeter and create a strong central green core for the HSRA.	Provided for within the masterplan
	Provide a range of open spaces of sufficient quantity and quality, for play and recreation (including areas of natural play), and where viable, incorporate the retention and management of existing green infrastructure.	Provided for within the masterplan
	Reflect the site heritage in the open spaces.	See DAS sections 10 to 20.
	Promote new planting throughout the development using distinctive formal and informal planting to support character areas.	To be determined at RM stage, but a full mix is allowed for within the masterplan.
	Establish a green buffer around the existing railway line that has ecological benefit and creates a positive interface between the railway corridor and residential uses.	Provided for within the masterplan
	Incorporate the River Taff as a distinctive feature and use the river corridor as a green spine that filters into the development, opening up the riverside and creating an accessible and pedestrian-friendly movement corridor along it.	Provided for within the masterplan
	Bring the River setting 'into' the site through incorporating water features/SuDS/watercourses in the public realm.	Provided for within the masterplan
	Develop green infrastructure that has the potential to add value and sense of place to the future development.	Provided for within the masterplan
	Develop a landscape-led approach that contributes to the sense of place.	Provided for within the masterplan

Transport

Policies relevant to this topic: NDFFW, PPW TAN 18 SW6 SW12

5.31 National policies and guidance in the form of in NDFFW, PPW, Technical Advice Note 18: Transport (TAN18), the Active Travel Act (Wales – 2021), and parking standards set out in the

CSS Wales - Wales Parking Standards 2008 are considered fully in the Transport Assessment (TA) produced by Apex Transport Planning Ltd to support the application. The TA considers the impacts of the proposals in relation to transport including the site connectivity, parking provision and access arrangements, road safety and vehicle trip generation. A separate Travel Plan has also been produced which provides measures to facilitate and encourage sustainable transport to and from the site.

- 5.32 RLDP policy SW6 sets out movement requirements, as assessed under section 4 above. Policy SW12 encourages a modal shift towards sustainable transport, 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. SW11 requires development to 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.
- 5.33 The TA has been produced following engagement with the highway authority on scoping and through a pre-application meeting, feedback from which has informed the design of the scheme.
- 5.34 It is a primary objective at all levels of planning policy to promote sustainable modes including walking, cycling and public transport and set out mitigation required to accommodate the development on the highway network. The TA considers the proposals against the transport hierarchy and sustainable transport policies in PPW12 to reflect the WG commitment to reduce reliance on the private car. The scheme is considered to satisfy the hierarchy in the following ways.

Active Travel- Walking and Cycling

- 5.35 The site benefits from proximity to cycle routes which can be accessed via new active travel links. The proposed development will facilitate journeys on foot and by cycle through the extensive network of footways / shared footway / cycleways running within the site and proposed along the site boundaries adjacent to Merthyr Road. In addition, one new toucan crossing is proposed adjacent to the bridge on the northern boundary and two pedestrian crossings are proposed to be upgraded to toucan crossings on Merthyr Road. Other pedestrian improvements are proposed through new dropped kerb crossings nearby.
- 5.36 Improvements to lighting at the underpass at the existing Pentrebach Rail Station are proposed, which are likely to be delivered via a reasonable and proportionate S106 contribution to be agreed, with works delivered by MTCBC (or Welsh Government / TfW).
- 5.37 Other, off-site routes could be improved, subject to proportionate S106 contributions.
- 5.38 An improved active travel route along Merthyr Road will deliver a MTCBC proposed cycling link. The development will also facilitate a bridge crossing over the railway / River Taff linking to the residential development to the west. This would offer a further connectivity benefit to and from existing surrounding areas.

- 5.39 The improvements for walking and cycling facilities as well as the routes within the site ensures the site fully promotes and improves active travel within the vicinity. The site will be fully permeable and well connected to its surrounds. The masterplan shows how the layout will encourage walking. This reflects the user hierarchy as set out in PPW12 and Manual for Streets guidance.
- 5.40 The site is therefore highly permeable by sustainable modes of travel and encourages walking and cycling movements appropriately, as well as providing improved opportunities for existing residents to travel by sustainable modes.
- 5.41 A Travel Plan has also been produced which provides measures to encourage cycling, such as information on cycling routes and cycling clubs.
- 5.42 The TA demonstrates that the development is in a location which is not car dependent as it is possible to walk or cycle to a significant number of facilities, services and public transport hubs via suitable routes within appropriate distances in accordance with the transport hierarchy in PPW12. The design of the site has considered active travel movements first, through the provision of extensive active travel routes and considering all key routes from the site and where improvements are required.

Public Transport

- 5.43 The TA identifies that the development has good active travel connectivity to Pentrebach Rail Station, as well as the new Metro rail station allowed for within the site, which will ensure all residents are within c.400m walking distance of a rail station.
- 5.44 There are also bus stops on Merthyr Road adjacent to the site, and a bus loop will be provided within the site allowing buses to access the new Metro rail station. The existing stops on Merthyr Road are served by five routes with a good frequency of service with regular services to Cardiff, Pontypridd and Merthyr Tydfil.
- 5.45 The TA concludes that future residents of the site would have significant potential to use bus or rail services as an attractive alternative to travelling by car. The good frequency of services will reduce waiting times for buses and trains. As such, the good quality walking routes to the bus and rail stations will encourage residents to use the services. The Travel Plan will ensure that the services are fully promoted to residents. The site location is appropriate for public transport use which is in accordance with the sustainable transport policies in PPW12.
- 5.46 Importantly, the proposals safeguard land that could deliver a new Metro station and a transport hub area, to include cycle parking, connection to a cycle route, bus stops, disabled parking and a park and ride facility. This encourages multi-modal journeys, including by sustainable modes of travel, and is fully in accordance with the transport hierarchy in PPW12.

Vehicular Access and Site Layout

- 5.47 The TA sets out an assessment of the vehicular access arrangements, concluding that they are safe and suitable and can accommodate the vehicle movements generated by the site appropriately, without queues impacting on through movements.

- 5.48 The TA provides junction modelling and traffic impact analysis, which demonstrates that the proposed redevelopment of the site would not have a material impact on the operational capacity of the highway network. During most of the peak hours, there would be a reduction in vehicle movements in comparison with the current use of the site (if it were operating fully), and the proposals would generate a significant reduction in HGVs to and from the site. During one PM peak hour there is a forecast minimal increase in movements, which result in just a 0.5% impact on traffic flows through the Pentrebach Roundabout, with movements dissipating onto the wider network from this point.
- 5.49 The supporting evidence in the TA shows that no highway improvements are required in relation to operational capacity, and this will assist in encouraging a modal shift to more sustainable modes of travel, in accordance the policy position of Welsh Government.

Transport Summary

- 5.50 The TA demonstrates that the site is situated in a highly sustainable location. Potential future residents can walk or cycle to a number and range of facilities, services, educational and employment locations within appropriate distances via good quality routes, reducing the need to own or travel by car. The site will also deliver a number of active travel routes and improvements, which would connect to the surrounding area.
- 5.51 The site also has (and will improve upon) excellent public transport links, which provide a suitable, attractive and realistic alternative to travelling by car. This includes the local bus and rail stations (including the new Metro Station) being adjacent to or within the site's boundary and offering routes connecting to key locations, including Cardiff. This will assist in constraining vehicle generation and reduce the need for residents to use a car. It will also benefit and attract residents that would prefer to travel by public transport.
- 5.52 Road safety and traffic data has been analysed and there is no evidence of a highway safety or capacity issue within the vicinity of the site which would be exacerbated by the proposals, and no evidence of an existing issue in relation to active travel for movements to and from the key local facilities.
- 5.53 The access arrangements are safe and suitable and can accommodate the vehicle movements generated by the site appropriately, without queues impacting on through movements.
- 5.54 No highway improvements are required in relation to operational capacity, and this will assist in encouraging a modal shift to more sustainable modes of travel, in accordance with the current policy position of Welsh Government.
- 5.55 A Framework Travel Plan has been produced which sets out measures to further minimise the impact of the development on the network and encourage a modal shift.
- 5.56 In combination with other measures set out in the TA, the scheme will provide significant transport mitigation and improvements in the form of:

- Facilitating improvements to the Pentrebach Railway Station.
- Safeguarding land to facilitate the delivery of a new Transport Hub and Metro Station.
- Active travel route improvements, including improvements to existing footways / cycleways to improve active travel connections and encourage walking/cycling. This will include new pedestrian crossings and dropped kerbs, as well as other offsite improvements to active travel infrastructure and lighting, to be delivered through S106 contributions.
- Safeguarding land to facilitate the delivery of a new bridge across the River Taff to the west.
- New bus shelter and infrastructure.

5.57 The Welsh Government as highway authority for the A4060 trunk road requested additional information as part of their PAC response. This is reproduced in full in the accompanying PAC Report. It states that they appreciated that only approval for the access points onto the local road network is being sought, however, they state that before they can give any agreements / conditions on the development, they would need to determine the proposals are feasible from a trunk road perspective. To that end they set out further information on the scheme to allow them to check on the capacity of several junctions, including:

- A4060 / Merthyr Road
- A4060 / Triangle Business Park Rd
- A470 / A4060
- A470 / A4102

5.58 The comments are noted, however, there is a concern that the requests are onerous and unnecessary given that impacts of the proposed development traffic on the specified junctions are either negligible or lower than the current permitted use of the site and the historic uses that have taken place on it. In the circumstances, further dialogue with the Trunk Road Agency is planned with the aim of reducing the scope/removing the requirement for further modelling.

5.59 The TA demonstrates that the proposals are fully in accordance with transport policies in Future Wales, PPW12, and TAN18. Considered against the existing baseline (and for future scenarios) the proposals will not have a material impact on the operation of the highway network. No mitigation is required in relation to highway capacity. The analysis presented within the TA enables the highway authority to provide a positive recommendation on the planning application.

Ecology, Biodiversity and Green Infrastructure (including Trees)

Policies relevant to this topic: PPW Ed 12 TAN 5 TAN 10 SW6 EnW1

5.60 Paragraph 6.4. of PPW states that the planning system must ensure development results in a net benefit for biodiversity and ecosystem resilience to enhance well-being. It defines a net benefit as development leaving “biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site.”

5.61 The onus is on the developer to demonstrate how their proposals will deliver a net benefit, including evidence of long-term site management and resources (6.4.8).

5.62 Policy EnW1: Nature Conservation and Ecosystem Resilience requires development proposals to promote the resilience of ecosystems. 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.

5.63 A rigorous approach has been taken to the environmental issues that the prospect of comprehensive redevelopment of the site raises. Walters has commissioned a comprehensive, timely and detailed series of investigations. These have included a full suite of ecological surveys and an arboricultural assessment.

5.64 The arboricultural surveys show that whilst the site is bordered by a range of good quality trees which provide amenity and biodiversity value, the trees within the main body of the site are limited to being contained within the open space and former staff amenity areas within the southern element of the site. These have been incorporated into the Development Framework Parameter Plan where appropriate to minimise tree loss across the southern section and boundaries of the site.

5.65 A summary of the main conclusions of the reports are provided below.

RECOMMENDATIONS FOR MITIGATION

- River Taff SINC - The River Taff SINC is present adjacent to the western site boundary. Development undertaken within the site poses a low risk of polluting the river subject to appropriate steps being taken during the site preparation and construction stages.
- Breeding bird habitat - Although every effort will be made to design existing habitats into the new development, wherever practicable, the loss of some nesting bird habitat may occur to accommodate the development. Standard seasonal or precautionary approaches to vegetation clearance will be applied.
- Bat Lighting Mitigation - Mitigation can be designed to prevent impacts to commuting and foraging bats focused on avoidance of artificial lighting impacts on areas within the site and in the local vicinity that may contain high value bat habitats.
- Invertebrates - Enhancements through the landscape proposals will increase the carrying capacity of the site for invertebrates.
- Wild Mammals - good building practices adopted during the construction phase will safeguard any individual animals which venture onto the proposed development area.
- Invasive Species - Before starting work, measures must be taken to prevent the spread of invasive species like montbretia, Himalayan balsam, and cotoneaster within the site.

- Reptiles - The majority of on-site reptile habitat will remain intact, that said, the new access route is scheduled to pass through areas of hedge with its adjacent grasslands. It is not necessary to entirely and permanently remove reptiles from the site, only to ensure that injury is not caused to individuals by the works. A precautionary approach will be taken site construction to minimise impacts to reptiles.

5.66 The report identifies a number of enhancement opportunities including:

- Bat and bird boxes, and bee bricks, should be incorporated into the design of any new buildings and erected on boundary trees wherever possible;
- The planting plan can be designed to include native species wherever possible or could be designed to benefit pollinators and provide a new hedgerow around the boundary of the application site.
- A wildflower area can be planted to benefit pollinators.

5.67 In Green Infrastructure (GI) terms, the site is currently largely covered by development. The Development Framework Parameter Plan establishes a multi-functional GI framework. This is recognised in the Green Infrastructure Statement that accompanies the application. This concludes that the scheme will provide a mixture of multifunctional public open space, native tree, hedgerow, wildflower habitat, bioretention features and on-plot soft landscape will significantly enhance the ecological value of the site and deliver biodiversity net gain for the development.

5.68 NRW has commented on protected species and the submitted ecology reports in its PAC responses, reproduced in the accompanying PAC Report. The confirm that they have reviewed the ecology information submitted in support of the application, noting that it identifies that bats may be present at the application site and that further survey work is required in the form of emergence surveys. They concur with this advice.

5.69 NRW advises that the additional survey work recommended in the report is undertaken and results submitted prior to determination of the application. If evidence of bat use is found, suitable avoidance, mitigation or compensation measures should also be provided as appropriate to the species and their use of the site.

5.70 The requirement for additional species surveys is noted. These are seasonal and are underway at present. Updated results will be provided as the planning application progresses. These will need to demonstrate that the proposed development will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

5.71 Subject to the provision of satisfactory updated Bat surveys that demonstrate the above, the assessment of the environmental effects of the scheme indicates that no unacceptable impacts are likely to be caused, and in many cases the scheme triggers an important improvement to the appearance, performance and potential of the site. The proposals are supported by and satisfy PPW, relevant TANs and local policy in the form of SW6 and EnW1.

Flood Risk and Drainage

Policies relevant to this topic: PPW, TAN 15, SW6 EnW4

5.72 TAN 15 (2025) has recently been published and is now in force at a national level. As set out within section 2, the vast majority of the site is in Flood Zone 1 for all types of flooding, i.e. at little or no risk from flooding. It has also been identified that the small pockets of the site are classified as Zones 2 and 3 (at risk of flooding) for surface water and small watercourses only. Para 6.1 of TAN 15 states that a Flood Consequences Assessment is required for any development proposal located fully or partly in Surface Water and Small Watercourses - Flood Zones 2 and 3.

5.73 TAN 15 also states that planning authorities should prioritise all types of development to Zone 1. Any allocation must be fully justified and should support the delivery of the LDP strategy. In this case, the site falls mainly within this category and has been allocated following a Strategic Flood Consequence Assessment (SFCA) prepared in June 2018 which supports the RLDP. This evidence has informed the spatial strategy by steering planned development away from sites most at risk of flooding, concluding that the HSRA represents a key part of the strategy to deliver on the housing numbers required by the plan. In addition to the SA, the SFCA demonstrates that the Plan would assist in securing the sustainable management of natural resources, including in relation to flood risk, again, which the site forms an integral part of that delivery.

5.74 Para 10.19 of Tan 15 states that planning applications in Zone 2 require careful consideration and must be consistent with the acceptability considerations set out in section 11. Para 10.22 states that planning applications in zone 3 require the strongest justification.

5.75 At para 10.24 it states that in zones 2, 3 developers must undertake a flood consequences assessment *proportionate* to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8. It also requires development to be consistent with the acceptability considerations set out in section 11.

5.76 Whilst Section 8 states that the risk-based approach recognises that surface water and ordinary watercourse flood risk cannot always be managed and mitigated, the National Strategy is clear that risk needs to be managed appropriately. The TAN requires a *proportionate* response depending upon that risk. It requires that planning authorities incorporate local flood risk considerations into their planning policies and decisions.

5.77 Section 11 set out acceptability criteria for flooding consequences. Para 11.3 states that whether a development should proceed or not will depend upon whether the consequences of flooding can be safely managed, including its effects on flood risk elsewhere. In all circumstances, developers and planning authorities should ensure the following conditions are met:

- No increase in flooding elsewhere
- Occupiers aware of flood risk
- Escape/evacuation routes present
- Flood emergency plans and procedures agreed and in place

- Flood resistant and resilient design
- Acceptable consequences for type of use

5.78 Para 11.5 states that the Flood Consequences Assessment should establish if suitable avoidance and mitigation measures can be incorporated, in a manner compatible with the placemaking aims of Planning Policy Wales, within the site design to ensure that development is safe and there is:

- minimal risk to life;
- minimal disruption to people living and working in the area;
- minimal potential damage to property;
- minimal impact of the proposed development on flood risk generally; and
- minimal disruption to the sustainable management of natural resources.

5.79 Para 11.6 indicates that the planning authority will need to arrive at a judgement on the acceptability of the flooding consequences and they should only permit development where the developer has demonstrated the risks and consequences of flooding are manageable.

5.80 TAN 15 therefore requires a proportionate assessment and response to flood risk. It is clear from the assessment undertaken that the flood risk identified on the site is only in small pockets the small pockets, which are as a result of inundation or blockage of the storm network, which is to be expected on a site of this size with localised flat areas. As the site is to be remediated and re-profiled this flood risk element will be removed and no longer present.

5.81 In short, the redevelopment of the site, its remediation and reprofiling, along with the introduction of a SABS compliant new surface water management system will eliminate the pockets of surface water flood risk within the site. In line with TAN 15:

- The flood risk within the site has been identified - it is predominantly Zone 1 and therefore suitable for residential development.
- A proportionate response has been taken to assessing the consequences of the flood risk for the small pockets of surface water risk identified. It is considered that those areas are only present due to the existing structures, poor drainage and hard surfacing on site. Those areas will be eliminated through the redevelopment and introduction of a suitable surface water drainage system.
- In line with Section 8 of TAN 15, the small areas of flood risk can be appropriately managed and mitigated (by eliminating them) and, in line with Section 11 there will be acceptable consequences as there will (through eliminating the flood risk) be:
 - minimal risk to life;
 - minimal disruption to people living and working in the area;
 - minimal potential damage to property;
 - minimal impact of the proposed development on flood risk generally; and
 - minimal disruption to the sustainable management of natural resources.

5.82 All requirements of TAN 15, including all acceptability criteria, have been satisfied. Consequently, it is concluded that on the grounds of flood risk, the proposed development meets the requirement set out in TAN 15 and the aims of Planning Policy Wales.

- 5.83 This position is confirmed by the NRW response to the PAC consultation, which is set out in full in the PAC Report. Their response makes reference to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) for advice on how the application should be considered in line with current planning policy. They confirm that they have reviewed the Drainage Strategy Report and Flood Statement undertaken by Quad Consult – dated 4 April 2025. Their advice is that the FCA satisfactorily demonstrates that the risks and consequences of flooding are manageable to an acceptable level.
- 5.84 Policy EnW4 states that development proposals will be required to incorporate measures to improve water quality where opportunities exist.
- 5.85 The Drainage Strategy for the site sets out that the proposed development will follow current Welsh Government, Local Authority, and Welsh Water guidance in relation to drainage strategy. Surface water will be discharged to the River Taff and the existing 'live' storm network using retained connection points. Discharge rates have been agreed with the SAB offering a minimum 50% reduction in peak flows. The surface water network will follow the principles set out the CIRIA SuDS manual (C753) and local SAB requirements. Where appropriate, surface water elements will be adopted by the local authority through the SAB application process.
- 5.86 A pre-planning enquiry has been sent to DCWW who have responded positively with an approved point of connection for all foul water from the proposed development. Quad Consult Limited may seek to request a second or alternative connection point following detailed design subject to level checks. The drainage will operate via gravity with no pumping envisaged at this stage. Foul drainage for a community hub has been allowed for in the calculations.
- 5.87 As required by EnW4, the supporting documents demonstrate that the proposals will incorporate measures to improve water quality through the SABS compliant strategy and meet the requirements of TAN 15 by avoiding unnecessary flood risk.

Air Quality, Noise & Vibration

Policies relevant to this topic: PPW, TAN 11, EnW4

- 5.88 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. PPW advocates good design principles for site planning to minimise impacts
- 5.89 Section 6.7 of PPW advises on Air Quality and Soundscapes. This references the 'agent of change principle' which says that a business or person responsible for introducing a change is responsible for managing that change. In practice, for example, this means a developer would have to ensure that solutions to address air quality or noise from nearby pre-existing infrastructure, businesses or venues can be found and implemented as part of ensuring development is acceptable. Proposed development should be designed wherever possible to prevent adverse effects to amenity, health and the environment but as a minimum to limit or constrain any effects that do occur.

5.90 Policy EnW4: Environmental Protection states that development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from, amongst other factors, air quality, noise and vibration. 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.

5.91 Hunter Acoustic Consultants have produced an Environmental Noise and Vibration Assessment to support the proposals. The presented report is based upon noise measured at the site and considers road traffic from the surrounding road networks, rail vehicle noise, along with industrial noise from the nearby industrial premises. The report assesses the suitability of the site with respect to Planning Policy Wales (PPW), TAN 11, British Standard 8233:2014 / WHO (1999), and British Standard 4142:2014+A1:2019. British Standard 6472-1:2008 "Guide to Evaluation of Human Exposure to Vibration in Buildings" is also taken into account.

5.92 Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes.

5.93 Noise and vibration surveys have been carried out across the site. Additional sample measurements were undertaken to aid calibration of a noise map model.

5.94 Road traffic is indicated to control the ambient noise climate day and night across the site, with rail traffic controlling at the western boundary.

5.95 The Hunter Acoustics report produces Noise map models to show noise propagation across the undeveloped site.

5.96 The site is indicated to fall mainly under NEC B of TAN 11. TAN 11 therefore advises:

"Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection."

5.97 The primary noise source comes from transformers on the western site boundary. The report advises that, if the transformers are to remain, then good acoustic design is required to ensure any residential dwellings in close proximity to these are suitably protected. This can be planned for at reserved matters stage through:

- maximising distance between the transformers and new dwellings.
- looking at acoustic screening of the noise sources by means of a suitably designed acoustic barrier or enclosure
- potential uprated glazing and ventilation to new dwellings to control noise intrusion.

5.98 The report advises that the site is suitable for residential development and that a suitably worded condition could be included on any forthcoming consent to control noise intrusion to habitable rooms and to private external amenity areas (gardens). The layout (to be defined at reserved matters stage) will need to take into account how best to locate and orientate properties to minimise the impacts of external noise sources, with further advice that a BS

4142:2014+A1:2019 assessment should be undertaken at detailed design stage to fully plan for noise mitigation measures.

- 5.99 The report does not identify any adverse conditions in terms of existing vibration.
- 5.100 The site is not within an area identified as having any air quality sensitivities and it will not introduce any uses which will give rise to any adverse conditions.
- 5.101 The analysis identifies that the site is suitable for the development proposed in terms of the existing environmental conditions, subject to appropriate design of the layout and building fabric at the detailed stage. It is therefore compliant with TAN 11 and the aims of PPW and EnW4.

Ground Conditions

Policies relevant to this topic: PPW, EnW4

- 5.102 As with noise and air quality, policy EnW4: Environmental Protection requires consideration of land contamination, hazardous substance, land stability and other identified risks to public health.
- 5.103 The application is supported by a Geoenvironmental & Geotechnical Site Investigation and Outline Remediation Strategy and a Coal Mining Risk Assessment (both produced by Integral Geotechnique). The reports identify the risks posed by the most recent and historic uses of the site, acknowledging that a careful program of site clearance, remediation and reclamation is required to prepare a site that is suitable for the new uses proposed, including the most vulnerable and predominant new use proposed for residential purposes.
- 5.104 The geotechnical report sets out an Outline Remediation and Reclamation Strategy which proposes that the works are split into two parts. Firstly, remediation, reclamation and enabling works will be required to prepare a suitably remediated surface suitable for development. Secondly, upon completion of the development works, an imported clean capping layer placed over a hi-vis geotextile separation membrane is envisaged in all gardens and areas of soft landscaping.
- 5.105 The reclamation and remediation works would prepare the site to a standard that would be suitable for the proposed residential development.
- 5.106 To minimise risks to controlled waters, infiltration in (or hydraulically above) previously developed/contaminated areas of the site should be minimised.
- 5.107 The remediation and reclamation works will be subject to engineering and geo-environmental monitoring with chemical and geotechnical testing carried out to the development plateau areas.
- 5.108 On completion of the works, specific validation reports up to the remediated surface will be issued for regulatory approval.

5.109 The remediation strategy also accounts for the risk identified in relation to coal mining activities in the area. The coal mining report considers that any potential ground subsidence risk associated with shallow underground mine workings could be adequately mitigated with the introduction of geogrid reinforcement without the requirement for drilling and grouting ground stabilisation.

5.110 It also acknowledges that to provide a suitable plateau for the proposed residential development, the site reclamation will be achieved through an 'excavation-and-recompaction' earthworks exercise undertaken and validated in accordance with an agreed Earthworks Specification. These works will ultimately result in re-engineering of the made ground beneath the site and an improvement in soil properties which will in-turn act as an additional form of mitigation against potential risks.

5.111 With regards to mine entries, the report identifies that worst case building exclusion zones must be applied around the Coal Authority identified shaft locations.

5.112 The worst-case building exclusion zones just encroach into the eastern extents of the future employment / commercial development parcel (situated to the east of Merthyr Road). When determining development layouts for this area of the site, it is recommended that no buildings are proposed at the defined building exclusion zones.

5.113 The reports also propose appropriate methods of working to minimise risks to site workers and the public.

5.114 The Coal Authority response to the PAC consultation is documented in the PAC Report. It states that the likely Coal Authority recommendation would be no objections, subject to the imposition of a condition to ensure the implementation of the necessary remedial measures and the works necessary to establish the layout implications posed by the two recorded mine entries within close proximity of the site.

5.115 NRW also responded to the PAC consultation in respect of ground conditions. Their full response is provided in the PAC Report. They state that, whilst they have concerns with the application as proposed they are satisfied that these concerns can be overcome by the planning authority attaching conditions on the following to any planning permission granted:

- Condition: Land affected by contamination
- Condition: Contamination verification report
- Condition: Unsuspected contamination
- Condition: Surface water drainage
- Condition: Piling
- Condition: Construction Environment Management Plan

5.116 In line with policy EnW4, land contamination, hazardous substances, land stability and other identified risks to public health have been fully considered and will be addressed through a comprehensive remediation and reclamation strategy to be secured by conditions, as well as through careful masterplanning of the development to avoid known risks.

Heritage

Policies relevant to this topic: PPW, TAN 24, SW11, CW1, HSRA Masterplan

- 5.117 Walters has commissioned a detailed investigation of the historic environment and the archaeological potential of the site.
- 5.118 An Archaeological Assessment (ref. edp9020_r002) has been prepared by EDP to support the application. The report confirms that Site does not contain any designated historic assets. Therefore, none will be physically affected by the Proposed Development.
- 5.119 The assessment concludes that the Site contains two non-designated 'proposed' locally listed buildings associated with the earliest built elements of the Hoover Factory. These comprise the 1948 built frontage to the Hoover Factory and a semi-circular security hut at the factory's front entrance. Both historic assets are of low or local heritage significance.
- 5.120 Historic environment objective 'safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved' of PPW12 applies to both non-designated historic assets located in the Site. As such, paragraph 6.1.9 and 6.1.25 of PPW12 would require consideration alongside local policies 'Policy CW1: Historic Environment' and 'Policy SW6: Hoover Strategic Regeneration Area' of the Local Development Plan for MTCBC, during the determination process of any planning proposals that would result in the physical alteration and/or demolition of the two structures.
- 5.121 There is no evidence that the Site contains buried archaeological remains from the prehistoric, Roman, early medieval or medieval periods (i.e. pre-industrial period) and it has been subject to considerable modern disturbance through its development. Therefore, the Site has a very low potential for archaeological remains to date from the prehistoric to medieval periods.
- 5.122 Any buried field boundaries in the Site, if present, would be of negligible or local heritage significance.
- 5.123 The Site does have a high potential for industrial and post-industrial (i.e. modern) remains, which comprise widespread 18th to early 20th century industrial waste (i.e. rubbish tip) deposits, as well as foundation layers associated with former tramroads and/or railway lines. Such deposits and layers are of no heritage significance.
- 5.124 Given the Site's previous industrial use and development and lack of potential for pre-industrial remains (i.e. prehistoric to medieval), it is anticipated that development would not result in any impact to any significant archaeological remains.
- 5.125 The Site has been identified to have a very low potential for Prehistoric to medieval remains and moderate-high potential for post-medieval to modern remains. Any encountered remains would likely comprise late 19th century to 20th century industrial remains (e.g. building platforms, building foundations, railway spur foundations, waste pits). These would be of very low to low significance.

- 5.126 The PAC response from Cadw (see submitted PAC Report) confirms that their records show there are no scheduled monuments or registered historic parks and gardens that would be affected by the proposed development and therefore they have no comments to make on the proposed development.
- 5.127 Policy SW 6 requires development to reflect the cultural heritage of the site in the design of new development, including reflecting the Hoover Factory frontage in the built form, and drawing upon historic built forms such as terraced dwellings. This is taken from the HSRA Masterplan document analysis of the site.
- 5.128 Page 62 of the DAS sets out the opportunities that will be presented for reflecting the design of the Hoover frontage within the community hub building.
- 5.129 On the analysis undertaken and the due consideration given to heritage matters, the proposals fully comply with national policy and RLDP policies SW5, SW11 and CW1.

Affordable Housing & S106

Policies relevant to this topic: SW9

- 5.130 Policy SW9 (Planning Obligations) of the RLDP set out that, where appropriate and having regard to development viability, planning obligations will be sought for onsite provision of affordable housing on sites of 10 homes or more at a level of 10% in the Primary Growth Area (the application area). It also sets out a requirement for the provision of open space on sites of 10 homes or more, where there is an identified need and, for other relevant obligations not included within the Council's Community Infrastructure Levy (CIL) Regulation 123.
- 5.131 The levels of affordable housing provision that the site can secure will be a matter for detailed discussion during the application, noting that the numerous other benefits will be secured through the proposals in the form of providing and enabling active travel and public transport improvements, green infrastructure, and other inherent benefits.

Sustainability

Relevant policies: PPW, NDFFW, SW6, EcW9

- 5.132 The proposals are inherently sustainable in the sense that the site is a brownfield site requiring remediation, and forms part of an identified regeneration area, forming a key element of the sustainable development strategy of the RLDP. It is sustainably located within an existing settlement, in proximity to a range of services and facilities and public transport options. The environmental design set out in the DAS (Section 17) outlines key site-specific objectives and principles and demonstrates a commitment to responsible, sustainable development.
- 5.133 The site lies within a designated Heat Priority Area (Policy EcW9) where the use of combined heat and power (CHP), combined cooling, heat and power (CCHP) and district heating will be encouraged. The policy states that the development will be expected to incorporate, where viable and technically feasible, infrastructure for district heating and to connect to existing systems where available.

5.134 The application description (and the Development Framework Parameter Plan) includes provision for a community heat hub. The infrastructure required to support a potential low-carbon energy strategy has yet to be determined. This will be investigated further as the development progresses to determine the viability and practicalities of delivering a district heating facility. For now, the application structure and layout support future provision if found to be deliverable.

6 Summary of Benefits & Conclusions

6.1 This statement provides the planning justification for the outline planning application for demolition of the existing Hoover factory site and its comprehensive, mixed-use redevelopment for a transformational regeneration project. Granting outline planning permission will be a major step forward in delivery of a key part of the LDP Strategy by:

- delivering 20% of the total housing requirement of the RLDP;
- facilitating transformational public transport benefits in the form of a new Metro station and community transport hub
- meeting plan objectives by promoting the reuse of suitable previously developed land; and
- supporting an integrated transport system.

6.2 The regeneration of the site has been a long standing, collective objective since the decline of the employment activity on the site led to a decision to support its re-use for other uses, supported by the RLDP. Aside from the strategic benefits outlined above, the information and analysis provided through the supporting documents which have been reviewed and summarised in this statement shows that the proposals will:

- Provide for up to 441 new homes;
- deliver a community hub;
- deliver new employment land;
- support new active travel routes;
- provide new public transport infrastructure;
- allow for the potential delivery of a community heat facility;
- safeguarding an area for a new footbridge over the Taff;
- facilitate improvements to the existing Pentrebach station;
- create a new community; and
- provide new green infrastructure and open space available to all;

6.3 The principle of the redevelopment of this previously developed site for the uses proposed is fully in compliance with planning policy and guidance at a national and local level, which supports brownfield development. It is allocated for the uses proposed in an adopted Local Development Plan.

6.4 These are important benefits; however, they are complemented by a number of significant and very positive economic impacts. These come from the preparation of the site and surrounding area, together with the construction and occupation of the new housing. This is because housing construction supports more jobs than investment in many other sectors of the economy, because of the amount of economic activity that is connected to it (in the supply chain). Housing development therefore provides an important economic function by:

- Creating jobs which can be local, varied, skilled and durable;
- Providing for a variety of direct (on site), indirect and induced employment opportunities;
- Providing a major source of vocational training and education;
- Acting as a pump primer and funder of social and physical infrastructure; and

- Increasing housing supply and improving housing affordability.

6.5 The Homebuilders Federation (HBF) provides a housing calculator ¹ that can be used to calculate the economic benefits of housebuilding. This relates only to the houses proposed and does not include the many other elements of the project that will bring about socio-economic benefits. According to the HBF Calculator, building 441 homes alone will:

- Support the employment of 1,532 people
- Provide 18 apprentices, graduates or trainees
- Increase open space, community sport, leisure spending by £396,900
- Generate £11,760,000 in tax revenue (including £887,512 in council tax revenue)

6.6 In this light the project can play an important part in improving the economic prosperity of the local community.

6.7 The fact that this can be achieved reliably - because of the use that is proposed and because of the company that is behind the application – is equally important. Walters is a land development company with a long and successful track record in regeneration and development.

6.8 Walters will also act as master developer for the site, and its sustained interest in the development of the whole project, will mean that its intention to commence quickly will be matched by its commitment to deliver high quality development based on the principles and proposals that run through this application.

6.9 This statement (and the other supporting documents) has shown that the scheme has been designed to address the detailed planning policy requirements set out in the relevant policies of the RLDP, and to accord with national guidance.

6.10 The traffic and transport aspects of the proposals have been shown to be acceptable and furthermore will bring about significant wider benefits for existing residents and local employees.

6.11 The ecological impacts have been shown to be acceptable, and through the GI improvements that the proposals will deliver there will be significant ecological enhancements.

6.12 The heritage value of the site has been evaluated and sensitive mitigation can be delivered through the detailed design stage.

6.13 The site is suitable (subject to appropriate mitigation) from a ground condition perspective, and through proper remediation will not give rise to any environmental impacts.

6.14 Subject to the planned re-profiling and SABS compliant drainage of the site, it is suitable in flood risk and drainage terms.

¹ HBF Housing Calculator <https://www.hbf.co.uk/policy/policy-and-wider-work-program/hbf-housing-calculator/>

6.15 The design and placemaking characteristics of the proposals are set out in detail within the accompanying DAS which demonstrates how the proposals can deliver a high quality, sensitive development in urban design terms.

6.16 The site is suitable for the uses proposed in terms of its soundscape and air quality. Redevelopment will bring about improvements in how the site drains and remove the existing pockets of surface water flood risk.

6.17 The following table provides a traffic light assessment of the proposals against the key planning policies.

Policy Reference	Policy Title	Traffic Light Compliance
NDFFW		
PPW Edition 12		
TAN 15		
Well Being Goals		
SW1	Provision of New Homes	
SW3	Sustainably Distributing New Homes	
SW4	Settlement Boundaries	
SW6	Hoover Strategic Regeneration Area	
SW9	Planning Obligations	
SW11	Sustainable Design and Placemaking	
SW12	Improving the Transport Network	
CW1	Historic Environment	
EnW1	Nature Conservation and Ecosystem Resilience	
EnW4	Environmental Protection	
EcW9	District Heating	

6.18 In summary, the site is suitable in terms of its technical and locational characteristics for the development proposed and the proposals have been formulated to accord fully with the

allocation requirements set out in the RLDP. Not only does it fully accord with development plan policies and the RLDP as a whole, but it will also bring about a transformational regeneration project which will benefit the local area through the provision of transport and placemaking infrastructure, modern housing, green infrastructure and employment land, all of which will result in significant socio-economic benefits.