

PLANNING STATEMENT

**Land to the north of
Crabtree Walk,
Trefechan**

June 2020



Summary

Proposal:

Demolition of a bungalow, construction of residential development, landscaping, parking and associated works

Location:

Land to the North of Crabtree Walk, Trefechan, Merthyr Tydfil

Date:

June 2020

Project Reference:

18.249

Client:

WDL Homes

Product of:

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

Prepared by:

Liam Griffiths | Graduate Planner

Approved by:

Emma Harding | Principal Planner

Disclaimer:

This report has been prepared for the sole and exclusive use of client whom it was commissioned and has been prepared in response to their particular requirements and brief. This report may not be relied upon by any other party.

The Contracts (Rights of Third Parties) Act 1999 shall not apply to this report and the provisions of the said Act are expressly excluded from this report. This report may not be used for any purpose other than that for which it was commissioned. This report may not be reproduced and/or made public by print, photocopy, microfilm or any other means without the prior written permission of Asbri Planning Ltd. The conclusions resulting from this study and contained in this report are not necessarily indicative of future conditions or operating practices at or adjacent to the Site. Much of the information presented in this report is based on information provided by others. That information has neither been checked nor verified by Asbri Planning Ltd.

Contents

Section 1	
Introduction	4
Section 2	
Site description	6
Section 3	
Planning background	8
Section 4	
Proposals	10
Section 5	
Supporting documents	12
Section 6	
Planning Policy Context	16
Section 7	
Appraisal	23
Section 8	
Conclusion	31
Appendix 1 – PPW10 Placemaking Appraisal	

Introduction

- 1.1 This Planning Statement accompanies a full planning application submitted on behalf of WDL Homes. The application comprises the demolition of a bungalow, construction of residential development, landscaping, parking and associated works on land to the North of Crabtree Walk, Trefechan, Merthyr Tydfil.
- 1.2 The proposal is to create a residential development that incorporates the best facets of design whilst accommodating 45no. residential dwellings, parking, landscaping and associated works. The development will make best use of the topography of the land to ensure the development is in keeping with the surrounding character and landscape setting.
- 1.3 The planning application comprises the following set of drawings prepared by Think Urban unless otherwise stated.

Drawing name	Drawing reference
Site Location Plan	TREF-15-04-01
Site Layout Plan	TREF-15-04-02
External Materials Layout	TREF-15-04-03
Boundary Enclosures Layout	TREF-15-04-04
Building Storey Heights	TREF-15-04-05
Refuse Collection Layout	TREF-15-04-06
Proposed Street Scenes	TREF-15-04-07
Site Sections Location Plan (Prepared by PHG)	1914-107-01 Rev A
Site Sections (Prepared by PHG)	1914-107-02 Rev A
Engineering Layout (Prepared by PHG)	1914-001-1-C
Landscape Plan (Prepared by John Campion Associates Ltd)	1901TM-02
Landscape Plan (Prepared by John Campion Associates Ltd)	1901TM-03
1-Oxwich Bay (Render) House Type	-
2-Windsor (Brick) House Type	-
2-Windsor (Render) House Type	-
3-Ashford (Render) - Elevations House Type	-
3-Ashford (Render) – Plans House Type	-
4-Oxwich (Brick) House Type	-
4-Oxwich (Render) House Type	-
5-Llangenith (Render) House Type	-
6-Laugharne (Brick) House Type	-

6-Laugharne (Render) House Type	-
7-Mewslade (Brick) House Type	-
9-Whitland (Brick) House Type	-
11-Pembroke (Brick) House Type	-
12-Garages	-
13-Aberaeron (Render) House Type	-
14-Caswell (Render) Floor Plans House Type	-
14-Caswell (Render) Elevations House Type	-
15-Tenby (Brick) House Type	-

1.4 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application forms (1APP)	Asbri Planning
Design and Access Statement	Asbri Planning
Planning Statement	Asbri Planning
PAC Report and Appendices	Asbri Planning
Phase 1 Ecology Survey	Ecological Services
Biodiversity Strategy	Ecological Services
Bat Scoping Survey	Ecological Services
Transport Assessment	Asbri Transport
Archaeology and Heritage Assessment	EDP Ltd
Archaeological Evaluation	GGAT
Tree Survey	ArbTS
Landscape and Visual Assessment	John Campion Associates Ltd
Flood Risk Assessment and Drainage Strategy	PHG Consulting
Geotechnical Desk Study	Arup
Borehole Soakaway Testing	Integral Geotechnique

1.5 The purpose of this Planning Statement is to summarise the proposals and to provide additional and complementary information to the planning submission. It provides a description of the application site at Section 2 and discusses the planning background of the site and development at Section 3. Section 4 outlines the proposals, Section 5 provides a summary of the findings of the accompanying documents whilst Section 6 sets out the planning policy context. Thereafter, Section 7 appraises the development before Section 8 draws together the conclusion.

Site description

General location

- 2.1 The site is located to the north west of Trefechan which is a residential area to the north of Merthyr Tydfil. Trefechan is predominantly comprised of residential dwellings with a short section of facilities located surrounding The Green. There are a number of shops, services and facilities located within Merthyr Tydfil Town Centre which is located approximately 3km to the south of the site. The site is centred on following grid coordinates E: 303446, N: 209070.

The site

- 2.2 The site is comprised of the existing bungalow known as Caerllwyn alongside the surrounding area which includes semi improved grassland and a number of natural features such as hedgerow, trees and stone walls. The site topography is steeply sloped from north to south given the valley location. The site measures approximately 2.8 hectares in extent.
- 2.3 A review of the TAN:15 development advice flood maps produced by NRW identifies the site is located within Zone A, as such, is considered to be at little or no risk of fluvial or coastal/tidal flooding.
- 2.4 A review of the Historic Wales Environment Records identifies that there are no listed buildings or scheduled ancient monuments within the site boundary. The nearest item of historic interest is Scheduled Ancient Monument Cefn Cil-Sanws Defended Enclosure located approximately 1km to the north of the site.
- 2.5 A review of the coal development advice maps identifies that the site is not located within a coal mining reporting area or within a development high risk area.
- 2.6 Within the Local Development Plan proposals map the site is identified as being within the settlement boundary, Merthyr Tydfil Landscape of Historic Interest and partially within a mineral buffer zone. Adjoining the site to the west is SINC – Cilsansws Common South and a limestone safeguarding area
- 2.7 To the north eastern boundary the site is bound by the rear gardens of residential dwellings fronting onto Sweetwater Park. The site is bound by the south east to the rear gardens of dwellings fronting onto Crabtree Walk and Hawthorn Hill. To the north and west the site is bound by undeveloped green land that is designated as a SINC – Cilsansws Common South. It is noted that the site is within close proximity to the boundary of Brecon Beacons National Park which is

located approximately 120m to the north. It is noted that there is a distance of 50 between the north-east boundary of the site and the nearest point of the National Park.

Access

- 2.8 There is an existing rural access lane which serves the two properties located central to the site which travel northwards of Crabtree Walk. Given that the majority of the site is undeveloped greenland there is no formal vehicular or pedestrians access available. From a wider perspective the site is accessed via Crabtree Walk which adjoins Vaynor Road.

Surroundings

- 2.9 The context surrounding the site is varied due to the hill site location. To the east and south of the site the areas are predominantly comprised of residential dwellings within Trefechan. A SINC and undeveloped open areas lie to the west within a similar context to the north including Brecon Beacons Nation Park boundary.

Planning Background

Planning History

- 3.1 The site has extant planning permission for the erection of 81 residential dwellings which was granted on the 2nd November 1977. Following the permission being received the development was lawfully implemented on the 5th August 1982 as confirmed in correspondence received from the authority on the 16th August 1982. The correspondence states the following:

"I refer to correspondence on the above proposals and to the operations carried out on site on Thursday 5th August, witnessed by my Town Planning Assistant, Mr. H. Llewellyn.

I would confirm that the works carried out constitute a "specified operation" under Section 43(2)(b) of the Town and Country Planning Act 1971 and as such, the detailed Planning Approved issued by this Council on 2nd November 1977 is deemed to be valid in perpetuity"

Pre-application Discussions

- 3.2 A pre-application enquiry was submitted to the Authority on 24th May 2019 and related to the development of the wider site comprising residential development of 42 dwellings. A meeting took place on 10th June 2019 and a response was received on 19th June 2019.
- 3.3 The pre-application response received confirmed that the principle of development is accepted.

Design Approach

- 3.4 In relation to the design, the pre-application response recognises the general design is considered to be appropriate to the site. The proposal will essentially be an expansion to the existing Trefechan housing estate with the layout comprising a central road that extends up the valley side branching off to cul-de-sac arrangements. The style and dwelling mix are similar to the nearby Sweetwater Park Estate which is a newer residential development within the area.
- 3.5 The response highlights concern with the siting/orientation of plots 8, 20, 23 and 40 alongside the garages in front of plots 29 and 30 which are considered to be inappropriately positioned and incongruous within the streetscene.
- 3.6 It is noted that section details will be required due to the site topography.

Landscaping

- 3.7 Due to the proximity of the Brecon Beacons National Park to the north of the site, the development has the potential to impact on the skyline/ridge to the north. It is noted that a buffer should be provided to reduce any potential impacts.
- 3.8 The general layout is too regimented and unsympathetic to landform although the layout has been informed by the topography of the site. An area of public open space should be incorporated into the scheme and could have duality as a SuDS feature. Finally, it is suggested an LVIA and ASIDOHL assessment will likely be required to support any subsequent planning application.

Highways

- 3.9 The comments from the highway's department recognise that an access track serves two residential properties at the centre of the site. A protected bridleway extends along the eastern boundary. The comments also offer that a possible solution for access to the site might be to create a priority system at the entrance the site.

Ecology and Drainage

- 3.10 Finally, comments were provided relating to ecology and drainage:
- The site lies adjacent to a SINIC;
 - The ecologists should review the final layout to ensure recommendations are incorporated;
 - A bat transect survey should be undertaken;
 - A lighting plan is required for nocturnal species;
 - Reptile translocation is needed;
 - Existing stone walls could be retained or moved within the site; and
 - Proposal should be SuDS compliant.

Access Application

- 3.11 An application was submitted on the 11th October for the access and highways engineering works required to support the subsequent residential development. The application was validated on the 16th October (Ref: P/19/0277). This application was approved on the 20th December 2019.

Proposals

- 4.1 The proposal comprises the residential development of 45no. dwellings with landscaping, parking and associated works. There are two properties existing and located central to the site one of which has been acquired by the applicant and is proposed for demolition. The other will be incorporated into the layout.

Layout

- 4.2 The layout includes 45 homes developed surrounding an internal highway which has been informed by the topography of the landscape. The layout also ensures the connectivity of the site with the surrounding residential development through the provision of pedestrian footways that link to the bridleway and Crabtree Walk. The layout has been designed to ensure the privacy and amenity of existing properties and involves the demolition of the bungalow known as Caerllwyn.

- 4.3 The proposed housing mix is as follows:

- 9 no. 3 bedroom houses
- 36 no. 4 bedroom houses

Materials

- 4.4 The materials for the homes involves a mix of render and brick which is consistent with the surrounding residential context.

Access and parking

- 4.5 As highlighted above, an access application relating to the proposed access has been submitted to the Local Planning Authority. The proposal also includes development of a new access into the land to the north of Crabtree Walk alongside highway improvements comprising:

- The highway improvements start from the left turning adjoining Hawthorn Hill;
- The existing highway loop of Hawthorn Hill/Crabtree Walk is formalised as a priority route;
- The proposed residential development road will become the principal highway with a new junction serving upper Crabtree Walk;
- A road narrowing introduced to control traffic flows/speed when exiting the new development;
- The existing 3m carriageway to Crabtree Walk is increased in width to improve traffic movement; and
- Development of formal parking bays along Crabtree Walk where there is currently on-street parking

- 4.6 A retaining wall is proposed to be located to the north of the parking layby. The wall will be varying in height the highest point is at the centre 1.8m tapering to 0m at either end. The access application was approved with conditions in December 2019.

Boundary Treatment & Landscaping

- 4.7 The proposal comprises a mix of boundary treatments which include close boarded fence, railings and weld mesh fence to the rear of properties located to the west. The use of welds mesh fencing has been included to soften the edge of the development that lies adjacent to the landscape buffer with the SINC beyond.
- 4.8 The proposal also comprises landscaping across the site that will soften the development.

Supporting documents

- 5.1 The following section intends to provide a brief overview of the supporting documents and reports which have been prepared to accompany the planning application for the proposed development.

Design and Access Statement

- 5.2 A Design and Access Statement has been submitted in support of the application. The statement has been prepared by Asbri Planning and explains the various facets of design and access in relation to the site alongside outlining planning policy relevant to the proposal. The statement also explains how the proposal complies with the 5 principles of good design identified in TAN12.

Pre-Application Consultation (PAC) Report

- 5.3 Following the proposal undergoing the statutory pre-application consultation a Pre-application Consultation Report has been produced by Asbri Planning and has been submitted in support of this application. The report summarises the responses received from Community, Specialist and Other consultees alongside responses to their representations.

Geotechnical Desk Study

- 5.4 A geotechnical desk study prepared by Arup is also submitted in support of the application. The study has confirmed the ground conditions on-site and has informed the how the proposals have been developed.

Borehole Soakaway Testing

- 5.5 Integral Geotechnique has undertaken Borehole Soakaway Testing to inform a proposed drainage strategy. The report concludes that, based on the borehole soakaway results, soakaways may be feasible within fractured layers of limestone.

Flood Risk Assessment and Drainage Strategy

- 5.6 A Flood Risk Assessment and Drainage Strategy has been prepared in support of the application by PHG. The strategy confirms that the application site is located in Flood Zone A which is considered to be at low risk of flooding or tidal flooding. The strategy also outlines how the site will address surface water and foul drainage. It is acknowledged that a separate drainage consent will be required from the Sustainable Drainage Approval Body (SAB).

Phase One Ecology Survey

- 5.7 A Phase One Ecology Survey has been prepared in support of the application by Ecological Services. The Survey assessed the site in terms of habitat and protected species. The Survey concluded that

the lies adjacent to the Cilsanws Common South SINC along the western boundary of field one. The site itself comprises semi improved grassland, bracken dominated scrub, scattered trees dry stone walling and tall ruderal vegetation. The Survey concludes that the site has potential for at least a moderate pollution of reptile species and also has potential for use by nesting birds. The survey recommends:

- A sensitive site design;
- The provision of a buffer to prevent encroachment into the SINC;
- Mature Trees to be retained where possible;
- Dry stone walling to be incorporated into the layout where ever possible;
- The provision of bird and bat boxes to be incorporated into the layout;
- The provision of planting to provide ecological enhancements; and,
- The production of a reptile mitigation strategy.

Biodiversity Strategy

- 5.8 A Biodiversity Survey has been prepared in support of the application by Ecological Services. The strategy includes the finding of the Bat Transect survey, the reptile mitigation strategy, the confirmation of the bat scoping survey for the bungalow as well as details regarding ecological enhancements for the site.

Bat Scoping Survey

- 5.9 Ecological Services have undertaken a Bat Scoping Survey on the property central to the site which is proposed for demolition known as Caerllwyn. A scoping survey was undertaken on the 23rd January 2020 in conditions of good natural light, all external aspects of the buildings were comprehensively evaluated for roost potential. Evidence was also sought for any staining or droppings, which could suggest bat occupation. Binoculars were used when required. No evidence of the presence of bats was noted during the scoping survey completed at Caerllwyn Bungalow. Very limited potential access points suitable for bats were noted within the building. Whilst two gaps were noted on the adjacent to the chimneys, one appears to be used a bird nest and the other does not extend into the building. A gap between the soffit board and wall of the single-story extension, close to the eastern chimney, of the property was also noted. No evidence of the presence of bats was found during the scoping survey completed at site. The building is considered to have negligible potential for use by bats.

Transport Assessment

- 5.10 The application is accompanied by a Transport Assessment prepared

by Asbri Transport which details the likely transport characteristics of the proposed development and identifies the potential impact of the proposals on the surrounding transport network. It is estimated that the proposed development could generate up to 30 two-way vehicle movements in the AM peak period and up to 29 two-way vehicle movements during the PM peak period which equates to less than 1 vehicle movement per minute. It is therefore envisaged that the proposed development will result in a marginal impact on the performance of the highway network. Moreover, parking provision of 146no. spaces is to be provided throughout the site which adheres to CSS Wales 2008 parking standards adopted by Merthyr Tydfil County Borough Council.

Archaeological and Heritage Assessment including ASIDOHL

- 5.11 An Archaeological and Heritage Assessment has been prepared by EDP to inform the residential development proposed. The report provides an assessment to consider the available historical and archaeological resources for the site, and to establish, as far as possible, the nature and significance of any known or potential archaeological features, deposits or remains within the redline boundary. The report also aims to assess whether, how and to what extent designated historic assets in the wider environs of the site derive 'heritage significance' from their setting, and to consider whether the proposed development of the site would change the setting of any historic assets, such that there might be an effect on their 'heritage significance'.
- 5.12 A lack of identified prehistoric, Roman and Medieval archaeology in the vicinity of the site suggests a low potential for archaeology to exist within the site from these periods. The potential to encounter low value, agricultural or building remains from the post-Medieval and Modern periods has been assessed as high. Nevertheless, as this potential archaeology is considered to be low value, it will not form a constraint to the proposed development. Historic maps also identified three mounds or areas of rubble within a north-eastern parcel of the site.
- 5.13 Effects on the Merthyr Tydfil Registered Landscape of Outstanding Historic Interest, located within the surrounding the site, have been assessed within the accompanying Assessment of the Significance of Development on Historic Landscape (ASIDOHL). In terms of indirect (visual) effects, within the Ty Newydd Character Area the proposed development will become dominant. Elsewhere it will only appear as a minor element in the landscape and will not introduce significant change. The only meaningful effects of the proposed development will be on the Ty Newydd character area.

Tree Survey

- 5.14 An Arboricultural Report has been completed by ArbTS which includes Tree Survey Data, Tree Constraints Plan, Arboricultural Impact Assessment and Arboricultural Method Statement. The purpose of the report is to give an assessment to the quality of the trees at site, assess the arboricultural impact of the proposed development design and provide details regarding the protection of retained trees during construction work.
- 5.15 The report highlights a total of 24 individual trees, 7 tree groups and 2 hedgerows of those surveyed 7 are category B, 23 category C and 3 category U. The report concludes that adhering to the tree protection details the proposed development can be constructed without any significant long-term adverse impact onto the retained trees or the amenity of the area.

Landscape and Visual Appraisal

- 5.16 A Landscape and Visual Appraisal has been carried out by John Campion Associates Ltd. The Appraisal assesses the likely landscape and visual effects of the development on the application site. The appraisal has been undertaken in accordance with best practice and concludes that the proposed development will only appear as a minor extension of the existing village.

Archaeological Evaluation

- 5.17 Glamorgan-Gwent Archaeological Trust to undertake an archaeological evaluation in the northwest quarter of the development at Trefechan, Merthyr Tydfil (NGR SS 03391 09097), as part of pre-planning works. The fieldwork took place between the 20th and 21st January 2020. Three trenches were targeted over three previously identified mounds which were thought to be of some archaeological potential. No significant archaeological finds or features were noted during the course of the work. The evaluation demonstrated that the mounds either represent clearance cairns, or stockpiled stone for wall repair or construction of the extensive drystone walling that forms many of the adjacent field boundaries. The archaeological works were carried out to the professional standards laid down by the Chartered Institute for Archaeologists 2014 'Standard and Guidance for Field Evaluations'.

Planning policy context

Introduction

- 6.1 The planning policy framework for the determination of this application is provided by the content and scope of national planning guidance, together with the Merthyr Tydfil Local Development Plan (adopted 25th May 2011).

Planning Policy Wales (PPW)

- 6.2 PPW Edition 10 was adopted by the Welsh Government in December 2018 and is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications. PPW Edition 10 sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.
- 6.3 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. PPW and the National Development Framework (NDF) set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).
- 6.4 Sustainable development is defined as:
- “Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. ”***
- 6.5 Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Plans at all levels of the development plan hierarchy must be prepared in accordance with national planning policies. Planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.

6.6 The aforementioned Well-being of Future Generations Act is further explored in Section 1 of PPW, within which the 7 goals are further discussed. The goals are intended to shape the work of all public bodies in Wales and are listed as follows;

- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and
- A globally responsible Wales

6.7 **Under Section 2 – People and Places – Achieving Well Being Through Placemaking**, 5 Key Planning Principles are highlighted, under the general heading of ***Achieving the Right Development in the Right Place*** which are:

- 1. Growing our economy in a sustainable manner***
- 2. Making best use of resources***
- 3. Facilitating Accessible and Healthy Environments***
- 4. Creating and Sustaining Communities***
- 5. Maximising environmental protection and limiting environmental impact.***

6.8 Placemaking is a key thread running through the 10th Edition of PPW. It is described as an ***“inclusive process, involving all of those with a professional or persona interest in the built and natural environment, which focuses on developing plans, making decisions and delivering developments which contribute to the creation and enhancement of sustainable places.”***

6.9 With reference to design, paragraph 3.5 states that ***“Good design is inclusive design”***. Furthermore, proposals are expected to ***“place people at the heart of the design process”***.

6.10 **Section 4 – Active and Social Places** defines those places which promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities. Places which are active and social contribute to the seven goals of the Well-being of Future Generations Act. The key issues in this theme include:

- *assisting in the delivery of cohesive communities which will meet the needs and are accessible to all members of society, including older people;*
- *tackling inequalities between communities, delivering services and jobs closer to where people live and acknowledging the*

importance of inclusive communities and the wider environment for good health and well-being;

- *improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles*

- 6.11 **Section 6 – Distinctive and Natural Places** – this theme covers environmental and cultural components of placemaking. Section 6.0.2 states:

“The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These features give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles.”

- 6.12 Section 6.3 of PPW10 relates to landscape recognising that all the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places.

- 6.13 Within this section paragraphs 6.3.5 – 6.3.10 relates to National Parks and Areas of Outstanding Natural Beauty. When determining planning applications planning authorities have a statutory duty to have regard to National Parks and AONB purposes. This duty applies in relation to all activities affecting National Parks and AONBs, whether those activities lie within, or in the setting of, the designated areas.

- 6.14 Section 6.3.6 states:

“In National Parks, planning authorities should give great weight to the statutory purposes of National Parks, which are to conserve and enhance their natural beauty, wildlife and cultural heritage, and to promote opportunities for public understanding and enjoyment of their special qualities”

- 6.15 Whilst not in the national park the site is nearby. Planning Policy Wales (PPW) (Edition 10) acknowledges the statutory purposes of National Parks and references the “Sandford Principle”, whereby if there is a conflict between the statutory purposes, greater weight shall be given to the first purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage.

Technical Advice Notes

- 6.16 The following TANs are considered relevant to this planning application:

Technical Advice Note (TAN) 12: Design (2016)

- 6.17 TAN 12 provides guidance on how good design should be achieved through the planning process. The document recognises that design is a process of analysis of the surrounding area recognising and resolving any issues that may be present.

Technical Advice Note (TAN) 18: Transport (2007)

- 6.18 TAN 18 explains how to integrate land use and transport planning with particular emphasis on how transport impacts should be assessed and mitigated through well designed developments.

Technical Advice Note (TAN 24): The Historic Environment

- 6.19 TAN 24 provides guidance on the historic environment during development plan preparation and decision making on planning and Listed Building (LBC) applications.

Merthyr Tydfil Replacement Local Development Plan

- 6.20 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decision should be made in accordance with the authority's adopted development plan, unless material considerations indicate otherwise. In this instance, the statutory development plan for this application site is provided in The Merthyr Tydfil Replacement Local Development Plan (LDP) 2016 - 2031 provides the local planning policy framework for the area and was adopted by Council on 29th January 2020.
- 6.21 Since the PAC the Merthyr Tydfil Replacement LDP has been adopted. Within the replacement LDP the site remains as unallocated white land within the settlement boundary and within the Merthyr Tydfil Landscape of Outstanding Historic Interest.
- 6.22 The following LDP policies are considered relevant in the context of the proposed development:

Policy Reference	Relating to
<i>Improving our Social Well-being</i>	
SW1	Provision of New Homes
SW3	Sustainably Distributing New Homes
SW4	Settlement Boundaries
SW9	Planning Obligations
SW11	Sustainable Design and Placemaking
SW12	Improving the Transport Network

Cultural Well Being	
CW1	Historic Environment
<i>Environmental Well-being</i>	
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

6.23 Policy SW1 relates to the provision of new homes and states:

“To sustainably grow our population, 2,250 additional homes are required. To ensure these are delivered, provision is made for 2,821 additional homes.”

6.24 Policy SW4 relates to settlement boundaries identifying the primary growth areas are Merthyr Tydfil and Trefechan.

6.25 Policy SW11 relating to Sustainable Design and Placemaking states Development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. The policy highlights 12 criteria that new development where appropriate will be required to meet.

6.26 Policy EnW1 relating to Nature Conservation and Ecosystem Resilience states:

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

Supplementary Planning Guidance

6.27 The following supplementary planning guidance is considered relevant to the proposal:

- Guidance Note No. 1 - Affordable housing;
- Guidance Note No. 2- Planning Obligations;
- Guidance Note No. 4 - Sustainable Design;
- Guidance Note No. 5 - Nature and Development; and
- Guidance Note No. 6 – Householder Design

Other Material Guidance

Brecon Beacons National Park

- 6.28 Section 61 of the Environment Act (1995) sets out the statutory purposes of the National Park as follows:-
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and
 - To promote opportunities for the public understanding and enjoyment of the special qualities of the National Park
- 6.28 In accordance with section 62(2) of the Environment Act, any relevant Authority shall have regard to National Park purposes when performing any functions in relation to, or so as to affect, land in a National Park. Relevant Authorities include public bodies, government departments, local authorities and statutory undertakers.
- 6.29 The Special Qualities of the National Park may be significantly impacted by development proposals on the fringes of the National Park. The Brecon Beacons National Park Management Plan 2015-2020 defines the Special Qualities of the Brecon Beacons National Park as follows:
- A feeling of vitality and healthfulness that comes from enjoying the Park's fresh air, clean water, rural setting, open land and locally produced foods.
 - A sense of place and cultural identity - "Welshness" - characterised by the use of the indigenous Welsh language, religious and spiritual connections, unique customs and events, traditional foods and crafts, relatively unspoilt historic towns, villages and family farms. The continued practices of traditional skills developed by local inhabitants to live and earn a living here, such as common land practices and grazing.
 - A sense of discovery where people are able to explore the Park's hidden secrets and stories such as genealogical histories, prehistoric ritual sites, medieval rural settlements, early industrial sites, local myths, legends and geological treasures.
 - The Park's sweeping grandeur and outstanding natural beauty observed across a variety of harmoniously connected landscapes, including marvellous gorges and waterfalls, classic karst geology with caves and sink holes, contrasting glacial landforms such as cliffs and broad valleys carved from old red sandstone and prominent hilltops with extensive views in all directions.
 - A working, living "patchwork" of contrasting patterns, colours, and textures comprising of well-maintained farmed landscapes, open uplands, lakes and meandering rivers punctuated by small-scale woodlands, country lanes, hedgerows, stone walls and scattered settlements.

- Extensive and widespread access to the Park's diversity of wildlife and richness of semi-natural habitats, such as native woodlands, heathland and grassland, natural lakes and riparian habitats, ancient hedgerows, limestone pavement and blanket bogs including those of international and national importance.
- In the context of the UK, geographically rugged, remote and challenging landscapes.
- Enjoyable and accessible countryside with extensive, widespread and varied opportunities to pursue walking, cycling, fishing, water-based activities and other forms of sustainable recreation or relaxation.
- An intimate sense of community where small, pastoral towns and villages are comparatively safe, friendly, welcoming and retain a spirit of cooperation.

Appraisal

Overview

- 7.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- The Principle of development;
- The Impact of the development on the Historic Landscape;
- The Impact of the development on highway and pedestrian safety;
- The Impact of the development on Surrounding Properties;
- The Impact of the development on the Character and Appearance of the Area; and
- The Impact of the development on Biodiversity.

The principle of development

- 7.2 The site is located within the settlement boundary and Primary Growth Area as defined by the Local Development Plan (LDP). This is where the majority of new development is generally supported in principle. The pre-app response confirmed that the principle of development is acceptable. Furthermore, the site has extant planning permission (Ref: P/76/0445) for the erection of 82no. residential dwellings which was granted on the 2nd November 1977. Although the permission is historic it establishes the principle of development subject to the proposal being compliant with current LDP policies. In addition, a full assessment against Placemaking principles is provided at Appendix 1 of this statement. The principle of development is therefore acceptable and the proposal is compliant with PPW10, Technical Advice Notes alongside LDP policies SW4 (Settlement Boundaries) and SW11 (Sustainable Design and Placemaking).

The Impact of the development on the Historic Landscape

- 7.3 As previously noted, the application site is located within the Historic Landscape of the main settlement of Merthyr Tydfil. Policy CW1 relates to the historic environment and states:

“development affecting undesignated historic environment assets including, Locally Listed Buildings or structures, Landscapes of Outstanding Historic Interest in Wales, Urban Character Areas and Archaeologically Sensitive Areas should have regard to their special character and archaeological importance.”

- 7.4 The historic landscape has been carefully considered with an Archaeological and Historic Assessment, including ASIDOHL2, of the site and proposal having been completed and helping to inform the

design. In relation to archaeology, there is a lack of identified prehistoric, Roman and Medieval archaeology in the vicinity of the site which suggests a low potential for archaeology to exist within the site from these periods. Historic maps depict the agricultural use of the site since at least the mid-19th century as well as the existence of at least three former buildings within the site. Considering this, the potential to encounter low value, agricultural or building remains from the post-Medieval and Modern periods has been assessed as high. Nevertheless, as this potential archaeology is considered to be low value, it will not form a constraint to the proposed development.

- 7.5 Historic maps also identified three mounds or areas of rubble within a north-eastern parcel of the site. The location of these mounds was confirmed during the site walkover, although the mounds themselves were inaccessible at the time of the survey. As they have not been identified by any survey prior to this assessment, it is unlikely that the mounds represent anything other than low value archaeology such as spoil heaps relating to nearby quarrying activity. The impact on archaeology is therefore considered to be acceptable.
- 7.6 The site is located within the Ty Newydd Character Area. In respect of this character area and the Merthyr Tydfil Landscape of Outstanding Historic Interest, GGAT requested that an ASIDOHL2 assessment be undertaken to inform the planning application. The total area of the Ty Newydd HLCA (058) is 7.1 hectares (ha). The entire development comprises an area of 3.3ha. Overall, the proposed development will have a footprint that is 46% of the whole HLCA. The absolute impact of the proposed development (loss of area) is therefore Considerable (score = 4). No impacts in landscape terms are identified, other than the loss of the drystone field walls.
- 7.7 In terms of indirect (visual) effects, within the Ty Newydd Character Area, the proposed development will become dominant. Elsewhere it will only appear as a minor element in the landscape and will not introduce significant change. In conclusion whilst the proposal has a stage 5 score of severe this is reflective of the area of land developed as a proportion of the whole HLCA together with marked visual changes. Relative to other developments within elsewhere within suburban Merthyr Tydfil the proposal is small with Ty Newydd HLCA being one of the smallest within Merthyr Tydfil historic landscape. The ASIDOHL concludes that, had a limited development of this type occurred within a bigger character area, the ASIDOHL score would have been markedly lower, and would arguably have better reflected a change to the historic landscape as a whole which is limited and leaves its key characteristics unaltered.
- 7.8 The application is also supported by a Landscape and Visual Appraisal (LVA). The LVA concludes that:

- There will be substantial permanent alterations to local topography;
- The existing property Mira Monte would experience substantial adverse residual effects arising from the development;
- No substantial adverse residual effects on the visual setting of any designated or non-designated heritage asset has been identified;
- No substantial adverse residual effects on users of either the national or local road network have been identified;
- There would be no substantial adverse residual landscape effects on the nearby areas of the Brecon Beacons National Park;
- There would be no substantial adverse effects on the nearby areas of the proposed Nant Morlais and Cwm Taf Cil-Sanws; and
- There would be no substantial adverse effects on the nearby areas of access land on the south slopes of Cefn Cil-Sanws.

7.9 As such, the LVA concludes that the proposal is considered to be acceptable in terms of Landscape and Visual impacts as the proposed development will only appear to be a minor extension to the existing village. As such the proposal is considered to be in accordance with PPW10, TAN12 (Design), TAN24 (The Historic Environment), Policy SW11 (Sustainable Design and Place Making), EnW5 (Landscape Protection) and Policy CW1 (Historic Environment) of the Merthyr Tydfil Local Development Plan.

The Impact of the development on Highway and Pedestrian Safety

7.10 The Transport Assessment prepared by Asbri Transport details the likely transport characteristics of the proposed development and identify the potential impact of the proposals on the surrounding transport network. This report also considers the on-site layout with regard to parking provision.

7.11 Given the site's location within close proximity to existing residential development there is already an established network of footways / paths in place within the vicinity of the site. The assessment identifies there are a number of local amenities and facilities within walking distance to the site including a community centre, pharmacy and post office. Route 8 of the national cycle network (NCN) runs approximately 500m to the east of the site "as the crow flies", and is a traffic free route which links Trefechan with Cefn-Coed-Y-Cymer to the south. The closest bus stop to the site is located on Hawthorn Hill approximately 120m walking distance from the proposed access to the site. Overall it is considered there is reasonable opportunity for

prospective residents of the site to utilise sustainable transport modes.

- 7.12 It is anticipated to provide a total of 146 car parking spaces at the proposed development of which, 2 are reserved for visitor parking. The total proposed provision at the development is slightly greater than the guidance stated within CSS Wales 2008 adopted parking standards. It is envisaged that most dwellings will have sufficient driveway parking to accommodate any visitors. If necessary, visitor parking at the proposed development will be provided on street. Cycle parking at the development will be provided in accordance with CSS Wales 2008 parking standards.
- 7.13 Analysis has been undertaken that show the junctions within the vicinity of the site are predicted to operate well within capacity in all future year assessment scenarios. On this basis, it is considered that no traffic impact mitigation measures will be required.
- 7.14 It is estimated that the proposed development could generate up to 30 two-way vehicle movements in the AM peak period and up to 29 two-way vehicle movements during the PM peak period, equating to less than 1 vehicle movement every minute. It is envisaged that the proposed development will have a marginal impact on the performance of the local highway network.
- 7.15 The Transport Assessment concludes that the traffic movements associated with the development proposals could be accommodated on the highway network and will not have a significant detrimental impact on the current or future conditions of the local highway network.
- 7.16 The application is accompanied by a Stage 1 Road Safety Audit (RSA) prepared by the Safety Forum, contained within the Transport Assessment, of the proposed access arrangement. As a result of concerns raised during the RSA, a priority arrangement is proposed at the carriageway narrowing so that traffic exiting the development is required to give way to inbound traffic. Similarly, the proposed highway works now propose pedestrian crossing provision at the location of the carriageway narrowing. As detailed within the planning history section the site access has received planning permission, ref. P/19/0277, This application was approved on the 20th December 2019. As such the principle of the access arrangement has been established.
- 7.17 It is therefore considered that the highway concerns regarding the proposed site access have been addressed and that the development will not result in an adverse impact on highway and pedestrian safety in accordance with Policies SW12 (Improving the Transport Network)

of the adopted Local Development Plan and supplementary planning guidance.

The Impact of the development on surrounding properties

- 7.18 As shown on the proposed layout plan the dwellings are positioned off the boundary in order to minimise impacts of overbearing, overshadowing and overlooking. It is acknowledged that the site does include a significant change in levels. However, the layout has been designed to provide adequate separation whilst working with the topography of the site to limit impacts on the amenity of existing neighbours. Mira Monte will remain within the site. The property will front onto a footpath that connect the most northern section of the site to the southern. There are properties located to the southern and western boundaries although the separation distances and topography of the land ensures Mira Monte will not be overlooked or experiencing overbearing from the proposed dwellings. Furthermore, Mira Monte's access and services will be maintained during the course of construction. Overall layout has been sympathetically designed to ensure that there are no amenity impacts on the occupier of this property.
- 7.19 The existing properties adjacent the sites southern boundary along Crabtree Walk will sit at a lower level than dwellings no 1 – 5. Whilst there is a level difference at this section of the site the distances between the existing and proposed properties helps to ensure that there will be no unacceptable overlooking or overbearing. In terms of the existing properties fronting Hawthorn Hill there is only 1 property proposed to the rear gardens of no. 10 -12. There is a significant separation distance between the existing and proposed properties alongside vegetation that will screen the proposed property. To the site's eastern boundary, the existing and proposed properties will be back to back with an existing bridgeway in-between. Overall, the impact in this area is considered to be negligible.
- 7.20 As such the proposal is considered to be acceptable in terms of residential amenity and in accordance with PPW10, TAN12 and Policy SW11 (Sustainable Design and Place Making), EnW5 (Landscape Protection) and Policy CW1 (Historic Environment) of the Merthyr Tydfil Local Development Plan.

The Impact of the development on the Character and Appearance of the Area

- 7.21 The proposed development has been designed to incorporate a palette of materials that are consistent with the surrounding area. It is considered that the scheme will have a positive relationship with other existing properties to the east and south of the application site. The proposed homes have been set off the boundary and in order to achieve highway gradients on site a level of cut and fill is proposed

which will result in the height of the proposed development being reduced below the ridge line of the adjacent Sweetwater Park. This will allow the housing to integrate with the residential context of the area.

- 7.22 Overall the proposal mimics the existing positive elements of the surrounding built context whilst adding features that enhance the area. As such the proposal is considered to be in accordance with the placemaking outcomes of PPW10, TAN12, Policy SW11 (Sustainable Design and Place Making), EnW5 (Landscape Protection) and Policy CW1 (Historic Environment) of the Merthyr Tydfil Local Development Plan.

The Impact of the development on Biodiversity

- 7.23 The application is accompanied by an Extended Phase One Ecology Survey prepared by Ecological Services Ltd. The Survey identifies that the site has potential for the presence of at least a moderate population of reptile species and has potential for use by nesting birds in the trees. A Biodiversity Strategy has therefore been prepared by Ecological Services Ltd which details mitigation measures for reptiles and nesting birds including:

Reptiles

- Areas of natural vegetation presently within the site boundary will be retained around the north and west boundaries.
- Any fencing used within the site boundary will allow the passage of small animals such as reptiles in order to allow recolonization in areas of suitable habitat within the site boundary.
- Sufficient rubble recovered from the dry-stone wall will be retained to create habitat piles within the retained vegetation.

Nesting Birds

- Any tree removal work is to be undertaken outside of the bird nesting season.
- Integrated bird boxes will be installed within 25% or 10 separate new buildings within the scheme.

- 7.24 Ecological Services have undertaken a Bat Scoping Survey on the property central to the site which is proposed for demolition known as Caerllwyn. A scoping survey was undertaken on the 23rd January 2020 in conditions of good natural light, all external aspects of the buildings were comprehensively evaluated for roost potential. Evidence was also sought for any staining or droppings, which could suggest bat occupation. Binoculars were used when required. No evidence of the presence of bats was found during the scoping survey completed at site. The building is considered to have negligible potential for use by bats.

- 7.25 It is therefore considered that whilst the site possesses potential for reptiles and nesting birds and lies adjacent to a Site of Importance for Nature Conservation, the above mitigatory measures will ensure that there are no adverse impacts on populations whilst further compensatory measures will enhance on site biodiversity in accordance with Policy EnW4 (Environmental Protection) of the adopted Local Development Plan.

Other Material Consideration

Archaeology

- 7.26 An archaeological field evaluation was undertaken in the northwest quarter of the site. The fieldwork took place between the 20th and 21st January 2020. Three trenches were targeted over three previously identified mounds which were thought to be of some archaeological potential. No significant archaeological finds or features were noted during the course of the work. The evaluation demonstrated that the mounds either represent clearance cairns, or stockpiled stone for wall repair or construction of the extensive drystone walling that forms many of the adjacent field boundaries. Overall it is considered that the proposal will have a negligible impact towards archaeology at the site.

The Impact of the Development on Brecon Beacons National Park

- 7.27 As set out in the planning policy section the Environment Act 1995 sets out the statutory purposes of the National Park identifying that any relevant Authority shall have regard to National Park purposes when performing any functions in relation to, or so as to affect, land in a National Park. This is further supported by the Brecon Beacons National Park Local Development Plan which sets out the special qualities of the national park and PPW:10.
- 7.28 The nearest point of the National Park is 50m from the north-eastern boundary, as detailed within the BBNPA PAC response. The Visual Impact that the proposed development will have on the landscape in which it sits has been fully considered in the accompanying LVA assessment. Section 4.18 of the LVA states:

"Although The Site lies close to the administrative area of the Brecon Beacons National Park, the National Landscape Character study places the village of Trefechan and the proposed development site within the identified NLCA 37, South Wales Valleys. The northern boundary of this NLCA appears to correspond with the line of the national park boundary locally. The adjoining NLCA to the north is NLCA30, Brecon Beacons & Black Mountains."

7.29 The LVA ascribes the overall level of sensitivity of the site as being medium. Whilst the site is within close proximity to the BBNP boundary its landscape setting is heavily influenced by its location at a lower level than nearby sites of the national park. The presence of high-density urban development on the sites eastern and south boundaries also form the sites setting.

7.30 The LVA at section 8.4 directly addresses the guidance relating to National Park designations contained within PPW10. This section states:

“The scale and siting of the proposed development would not have substantial adverse effects upon local landscape character beyond The Site and its immediate environs. Building materials and finishes will be appropriate to this location, contiguous with the existing edge of Trefechan, which has limited diversity and generally undistinguished residential built form. The landscape character of The Site is not the same as that on the land high above The Site and further to the north-west and outside the current settlement boundary. There would therefore be no adverse effects upon the stated Special Qualities of the national park. The proposed development would not conflict with the statutory purposes of the Brecon Beacons National Park.”

7.31 Finally the LVA offers conclusions and in relation to the BBNP states ***“there would be no substantial adverse residual landscape effects on the nearby areas of the Brecon Beacons National Park. No substantial adverse residual effects would occur on the visual setting of nearby areas of the Brecon Beacons National Park or on views out from the national park.”***

7.32 In preparing the development proposal the statutory purpose and special qualities of the national park have been given regard as required by section 61 – 62 of the Environment Act 1995. As detailed above it is considered that the proposal is acceptable in relation to the BBNP purpose and is not detrimental towards the National Park Qualities. As such the proposal is compliant with the Environment Act 1995, PPW10, BBNPA LDP, Merthyr Tydfil LDP and supplementary planning guidance.

Conclusion

- 8.1 This Planning Statement accompanies a full planning application submitted on behalf of WDL Homes Ltd which comprises the demolition of a bungalow, construction of residential development, landscaping, parking and associated works
- 8.2 The proposed development will contribute positively to housing need within Merthyr. The site is located within settlement limits and has an extant consent for residential development which establishes the principle of development.
- 8.3 The proposed residential development and associated works have been designed to recognise the location and constraints of the site and through appropriate layout and mitigation is considered to be in accordance with planning policy.
- 8.4 The suite of supporting documents demonstrates that the proposed development is acceptable in relation to biodiversity, landscape, highways, archaeology, arboriculture and drainage.
- 8.5 During pre-application discussions with the LPA, specific layout requirements were highlighted along with highways and drainage requirements which have been incorporated into the proposed site layout.
- 8.6 On this basis, it is considered that the proposed development accords with relevant national and local planning policy and guidance and any material planning considerations. As such, it is respectfully requested that Merthyr Tydfil County Borough Council grant full planning consent for the proposed residential development at Land to the North of Crabtree Walk