



21 February 2020
Ref: P/18/0330

The Planning Department
Merthyr Tydfil Council
Civic Centre
Castle Street
Merthyr Tydfil
CF47 8AN

Dear Sir/Madam,

S73 Application to amend condition 2 (Approved Plans) of Planning Permission P/18/0330 – Construction of 10 affordable dwellings with associated retaining walls, parking, access and new footpath located on the land at East Street and Upper Union Street, Dowlais, Merthyr Tydfil.

On behalf my client, Merthyr Tydfil Housing Association, please find enclosed a S73 application in respect of Planning Permission P/18/0330. The application submission includes:

- Application forms;
- Site Location Plan;
- Amended Site Layout;
- Amended Sections;
- Amended Context Elevations; and
- Updated Drainage Strategy.

The fee of £190 associated with this application has been sent under separate cover by the applicant. A full list of the documentation accompanying this application is appended to this letter.

The following table outlines the plans and documents to be substituted as part of this application.

Approved Plan/Document	New Plan/Document
Site Layout L781 A112 Rev K	Proposed Site Layout L781 A112 Rev L
Context Elevations L781 A123 Rev F	Proposed Context Elevations L781 A123 Rev G
Site Sections L781 A124 Rev E	Proposed Site Sections L781 A124 Rev F

In addition, the following documents/reports are submitted for information purposes:

- Parking Assessment (ref: 20009d1); and
- Updated Drainage Strategy (February 2020).

Site Location and Description

The application site is located within the built up area of Dowlais, which is situated to the eastern extent of the settlement of Merthyr Tydfil. Dowlais Top lies to the east, with Penybryn to the west. The A4060 lies to the south of Dowlais, with the A465 (Heads of the Valleys Road) to the north. Open countryside surrounds the wider settlement of Merthyr Tydfil. The County Borough is bound by Caerphilly to the east, and Rhondda Cynnon Taf to the west, both of which connect to the A470.

The application site comprises a vacant 'L' shaped parcel of land which extends to approximately 0.18ha. Topographically at its steepest point the site rises by approximately 4m in a northerly direction. The site is bound to the north by Upper Union Street (a lightly trafficked street with a 20mph speed limit) and a small 1.5 storey building occupied by Cancer Aid. The Cancer Aid building exhibits a natural stone and cream render finish with a slate roof. The boundary between the Cancer Aid building and the appeal site comprises black decorative railings.

To the east the site is bound by Commercial Street, again a lightly trafficked road with a footway along its eastern side. To the south the site is bound by East Street and the rear gardens of a number of existing densely developed post war terraced properties. These dwellings are finished in red brick and cream render with grey concrete tiled roofs. The boundaries of these properties comprise palisade fencing, located directly adjacent to the footway. To the west the site is bound by Church Street which serves Dowlais Library and Dowlais Constitutional Club, this section of carriageway benefits from footways along both sides along its northern section. The southern section of Church Street connects to a pedestrian route which provides access to Victoria Street and Market Street.

In terms of the wider context, the site is surrounded predominantly by residential development. St John's Church and Dowlais Stables are located to the north of the appeal site. St John's Church is a Gothic Style Grade II Listed Building and Dowlais Stables comprises a 19th Century Stone Building which is now a Merthyr Tydfil Housing Association development for the over 50s. An area of public open space is situated to the east with further residential development to the south and Dowlais Library and Dowlais Constitution Club to the west.

Proposed Development

The amendments proposed as part of this application are outlined as follows:

- Reduction of 1no. car parking space proposed for plots 2 and 3 (total reduction of 2no. spaces);
- Minor relocation of the footprint of plots 2 and 3. Plot 2 will be relocated 400mm to the west and plot 3 will be relocated 400m to the east.

The amendments proposed as part of this application are required to facilitate the implementation of a revised drainage solution in respect of the proposed development consented under application P/18/0330, which has been refined through the detailed design process.

Planning Policy Context

The planning policy context relevant to this application is set out below.

The Merthyr Tydfil Local Development Plan 2006 – 2021 (Adopted 2016)

This S73 application seeks to secure a number of modifications to the approved scheme as described previously. In view of this, it is not considered necessary to provide a full assessment of the main development plan policies and so instead a summary of the most pertinent policies of the LDP are provided below.

- BW1 – Development Strategy (Primary Growth Area)
- BW4 – Settlement Boundaries/Locational Constraints)
- BW5 – Natural Heritage
- BW6 – Townscape and Built Heritage
- BW7 – Sustainable Design and Placemaking
- BW8 – Development and the Water Environment
- BW11 – Transport, Cycling and Pedestrian Proposals
- BW12 – Development Proposals and Transport
- BW13 – Managing Housing Growth
- BW17 – Securing Community Infrastructure Benefits
- BW19 – Affordable Housing Target
- AS4 – Historic Landscape
- AS11 – Public Transport – Rail

- TB11 – Access, Parking and Accessibility of Local Facilities
- TB9 – Mineral Buffer Zones

In addition to the policies outlined above, the following Supplementary Planning Guidance is also considered relevant to the development proposals:

- Guidance Note 1 – Affordable Housing
- Guidance Note 2 – Planning Obligations
- Guidance Note 4 – Sustainable Design

Planning Policy Wales (Edition 10)

The main purpose of PPW is to ensure that the planning system contributed towards sustainable development and improves the social, economic, environmental and cultural well-being of Wales. Placemaking lies at the heart of PPW, with policy and development management decisions required to seek to deliver development that adheres to these principles.

To ensure placemaking is prioritised, and in order to aid in implementing the Well-being of Future Generations Act, policy topics within PPW have been grouped under four themes, namely ‘Strategic and Spatial Choices’; ‘Active and Social Places’; ‘Productive and Enterprising Places’; and ‘Distinctive and Natural Places’. Each of the four headed chapters is supplemented by detailed and interwoven policy which seeks to work together in delivering sustainable places.

PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. In this regard it seeks to achieve the Welsh Government’s well-being goals, which are to achieve:

- A globally responsible Wales
- 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
- A globally responsible Wales

All statutory bodies in Wales carrying out a planning function must exercise those functions with the principles of sustainable development as defined in the Well Being Act. Accordingly, paragraph 1.17 of PPW confirms that there is a presumption in favour of sustainable development.

Paragraph 4.1.51 of PPW states that *“Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off- street parking when well designed.”*

Paragraph 4.1.53 further outlines that *“Parking standards should be applied flexibly and allow for the provision of lower levels of parking and the creation of high quality places.”*

Technical Advice Notes

The following Technical Advice Notes are considered relevant to this application:

- TAN18: Transport (2007)
- TAN12: Design (2016)

Drainage

In respect of the revised drainage design, Jubb have produced an updated drainage strategy, which accompanies this application (ref: S104 T5). This strategy confirms that there is a viable solution for the discharge of both foul and storm water from the proposed development.

Design and Heritage

Due to the sites location within a Conservation Area and a Landscape of Historic Interest, an Archaeological Assessment was undertaken as part of the original application, this assessment confirmed that the scale of the development would be appropriate for the area and would not detract from the prominence of the key historic buildings in the vicinity.

The amendments proposed as part of this application do not affect the design or scale of the proposed dwellings and in turn will not have a more significant impact on the Conservation Area or wider historic landscape.

Ecology and Trees

A Phase 1 Ecology Survey was undertaken as part of the original application. This survey confirmed that the habitats which exist on site, comprising grassland, scrub and scattered trees are considered to be of some value to flora and fauna such as foraging bats, birds and invertebrates, however are unlikely to have any significance in this regard and as such the proposed development would not have an adverse impact on protected species or habitats. There has been no change to the habitats present on site since the grant of the original planning permission, and therefore no further ecology survey effort or mitigation works are considered necessary in respect of this S73 application.

Highways and Transport

As part of the approved proposal, it is proposed to widen the existing carriageway along East Street from 4.2m to 4.7m and provide a new 1.5m footway along the northern side of East Street in addition to the existing 1.8m footway along the southern side. This improved provision will help to facilitate ease of movement of vehicles along East Street. Both vehicular and pedestrian access for the new dwellings would be provided directly off East Street. Cycle parking will also be provided at a ratio of 2 spaces per house and 1 space per flat.

The proposed amendments to the parking provision for plots 2 and 3, will not affect the existing approved access arrangements or the carriageway widening scheme. Furthermore, Lime Transport have undertaken a Parking Survey to inform this application. This survey confirms that the proposed development is eligible for a reduction in parking of 1 space per dwelling in line with the council's adopted SPG, based on the site achieving a total of 9 sustainability points.

Furthermore, the report also outlines that the average car ownership levels for affordable dwellings in Merthyr Tydfil in comparison to private dwellings is less than half at just 0.48 cars per household. Finally, overnight parking beat surveys have also been undertaken which confirm that the area surrounding the site is subject to just 26% parking stress. Typically, practical capacity is reached when 85% of the available spaces are occupied. Therefore, the parking stress in the local area is extremely low, and there is a plentiful supply of available on street parking for both existing and new residents.

The justification for the proposed development

Outlined below are the main issues relevant to the determination of this S73 application and an assessment of the scheme against the relevant planning considerations. These matters include:

- The principle of residential development;
- Parking Provision;
- Residential amenity considerations; and
- Any other material considerations, including Planning Conditions.

Principle of Residential Development

The proposed development site is located within the settlement boundary as shown on the Adopted Merthyr Tydfil LDP Proposals Map. In addition, the application site already benefits from an extant

planning permission for residential development (P/18/0330), the principle of residential development in this location is therefore already established.

Parking Provision

As outlined within the Parking Survey accompanying this application, there is ample parking located within the vicinity of the application site to accommodate for the needs to surrounding residential properties. The site also qualifies for a reduction in parking in line with the council's SPG sustainability criteria. The proposed reduction of 2 spaces in the context of the overall development is therefore considered acceptable.

In addition, as outlined above, the site is situated in a sustainable location, in close proximity to a wide range of facilities and services, thereby reducing the need for occupants to own a car. It should also be noted that occupants of social rented properties have significantly lower car ownership levels than those of private properties.

Residential Amenity Considerations

The amendments to the location of the proposed dwellings do not impact upon the separation distances with the Cancer Aid Centre or the existing dwellings located to the north or south of the site along East Street, and therefore will not result in any increased impact over and above the approved scheme.

Furthermore, in relation to the proposed landscaping scheme, the revised proposals include the provision of an additional landscaped area to the rear of plot 2 & 3's parking area. This is considered to reflect an improvement in terms of visual amenity in comparison to the existing approved scheme.

Other Material Considerations

Due to the limited amendments proposed as part of this application, it is not considered appropriate to attach any additional conditions to any decision notice associated with this application, over and above those outlined on the decision notice for the original planning permission.

It is considered that the scheme represents a well considered proposal, which remains in keeping with the parameters which were assessed as part of the original planning permission and does not give rise to any adverse impact over and above the existing development proposal. On this basis, it is respectfully recommended that Merthyr Tydfil County Borough Council support the scheme proposals and put the application forward for approval.

Summary

I trust this information is of assistance and look forward to receiving confirmation of receipt, however should you have any queries or would like to discuss in any further detail, please don't hesitate to contact me.

Yours sincerely,



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