

PLANNING STATEMENT

**Land to the east of
Kingsley Terrace,
Aberfan**

October 2022



Summary

Proposal:

Residential development and associated works

Location:

Land to the east of Kingsley Terrace, Aberfan

Date:

October 2022

Project Reference:

22.104

Client:

Merthyr Valley Homes and M. Delacey & Sons

Product of:

Asbri Planning Limited
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Cardiff CF23 8RS

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Disclaimer:

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Introduction

- 1.1 This planning statement accompanies a full planning application submitted on behalf of M. Delacey & Sons for residential development and associated works on land to the east of Kingsley Terrace, Aberfan.
- 1.2 The application site comprises 0.34-hectare parcel of land located to the west of the Taff Trail in Aberfan and benefits from full planning permission for 8 dwellings granted on part of the site in January 2018 (P/17/0245).
- 1.3 This application has addressed Merthyr Tydfil County Borough Council's considerations with regards to the pre-application enquiry (Ref: PA/22/0012) and it is now considered to comply with all national and local planning policies. The number of proposed dwellings has been reduced from 14no. to 8no. residential dwellings.
- 1.4 The proposed development comprises the development of 8no. residential properties, the mix of which will include a combination of two-bedroom and three-bedroom houses. The properties will be affordable dwellings, to be managed by Merthyr Valley Homes. The design and layout fully adhere to placemaking principles and is considered to also be fully compatible with Wellbeing principles, as contained within the Future Generations Act.
- 1.5 Merthyr Valley Homes' vision is to provide homes and thriving neighbourhoods where people are proud to live. Merthyr Valley Homes wish to bring the following objectives:
- Financial strength allowing to achieve theirs shared ambitions
 - Greater Opportunities in order to deliver homes and services people want and need
 - Pride in the resilient communities
 - Pride in the organisation they owe and work for
- 1.6 This Planning Statement acts as a supporting document for the accompanying planning application and should be read in conjunction with all other elements of the application which include the following plans:

Document	Drawing Ref.
Site Location Plan	LT2202.00.01
Proposed Site Layout	LT2202.04.01

Proposed Site Sections	LT2202.04.02
4P 2B House Type – Rev.B	LT2202.04.100
5P 3B House Type – Rev.B	LT2202.04.101
Block Plan	LT2203.04.03
Boundary Details	LT2203.04.04
Proposed Rear Garden Retaining Wall Redi-Rock Gravity Wall	22023-PL-004-0
Preliminary Engineering Review	22023-PL-001-D

- 1.7 In addition, the following supporting documents are submitted in support of the proposals:

Document	Prepared by
Planning Statement	Asbri Planning
Coal Mining Risk Assessment & Soakaway Testing	Terra Firma
Arboricultural Report	ArbTS
Preliminary Ecological Appraisal	Soltys Brewster Ecology
Sustainability Assessment	Asbri Transport

- 1.8 In terms of the content of the Planning Statement, this chapter is followed by a brief description of the site and its context at chapter 2 with the planning context and an account of the pre-application discussions identified at chapter 3. Chapter 4 provides an outline of the proposed development whereas chapter 5 identifies the relevant national and local planning policies which provide the framework for appraising the proposed development. Meanwhile, chapter 6 provides an appraisal of the site, in light of national and local policies, identified under section 5, and assesses the overall appropriateness of the proposal in planning terms. The Statement then concludes within chapter 7.

Site Description

Site Location

- 2.1 The site is located on land opposite 1-17 Kingsley Terrace, Aberfan, Merthyr Tydfil CF48 4PH. It is centred on the following grid coordinates: E: 307239; N: 199529.

Site Features

- 2.2 The site is an irregular plot of land measuring approximately 25m deep by 80m wide with an overall site area approximately 0.2 hectares. It is bound to the north and south by an area of vacant scrub land. To the west of the site is the main highway serving the site and a row of traditional style terraced properties that form part of Kingsley Terrace.
- 2.3 To the east is a watercourse and the Taff Trail, which is also used as a rear access lane serving the nearby terraced properties forming part of Thomas Street, Cross Street and Perthyglesion.
- 2.4 The western part of the site is reasonably level with the adjoining highway and slopes downwards steeply in the east towards the watercourse.

Access

- 2.5 Vehicular access to the site is attained directly off Kingsley Terrace. The site is not currently served by a footpath. The existing footpath which bisects the site and links Kingsley Terrace with Cross Street to the east will be retained to maintain pedestrian permeability and promote Active Travel.
- 2.6 The site lies in a sustainable location within close proximity (400m) to Merthyr Vale train station and bus stop along Walters Terrace approximately 100m east beyond which lies Ysgol Rhyd Y Grug. In addition, there are a number of services and facilities situated along Bronheulong Terrace approximately 660m to the north. It possesses good pedestrian permeability with a footpath bisecting the site and connecting Kingsley Terrace with Cross Street.

Surroundings

- 2.7 In terms of surroundings, the site lies in a predominantly residential area with dwellings situated in all directions. The surrounding residential context comprises two-storey terraced dwellings. Ysgol Rhyd y Grug is located 150 m to the east.

- 2.8 A review of the character of the site and surroundings has been undertaken to enable an appreciation of the materials and style of buildings in the vicinity. There are a range of styles and characters present in the vicinity of the site. The closest buildings to the site have the following characteristic features:
- Two storey properties along Kingsley Terrace, Aberfan;
 - Mostly terraced houses with traditional narrow frontages;
 - Most roofs are pitched and hipped, all appearing to be finished with grey slate tiling;
 - Predominantly render and coloured paintwork are used extensively in the area;
 - In terms of porch styles, mostly small flat roof projections above front doors are present;
 - Windows are elongated, mostly timber frames or white plastic window replacements;
 - Front gardens are bordered mostly by low brick walls and hedges.
- 2.9 The site lies in a sustainable location within close proximity (400m) to Merthyr Vale train station and bus stop along Walters Terrace approximately 100m east beyond which lies Ysgol Rhyd Y Grug. In addition, there are a number of services and facilities situated along Bronheulog Terrace approximately 660m to the north. It possesses good pedestrian permeability with a footpath bisecting the site and connecting Kingsley Terrace with Cross Street. The nearest convenience store is located on Cross Street a 2-minute walk from the site. The nearest Post Office is on Aberfan Road just a 9-minute walk from the site. Ysgol Rhyd y Grug Primary School is approximately 0.5 mile away.

Planning Context

Planning History

- 3.1 A review of Merthyr Tydfil CBC's online planning register reveals that the site has been subject to the following planning history:

Reference number	Description	Decision and date
P/18/0400	Discharge of conditions 3 (material finishes), 4 (ecological buffer zone), 5 (footpath), 6 (retaining works) and 7 (landscaping) of planning permission P/17/0245 relating to a residential scheme	APPROVED 14th February 2019.
P/18/0185	Discharge of Conditions 3 (materials), 4 (buffer zone management plan) and 7 (landscaping) of planning permission p/17/0245 relating to a residential scheme.	REFUSED on 30th October 2018 due to a conflict between the proposed landscape plan and the buffer zone along the rear embankment and watercourse.
P/17/0245	Erection of 8 dwellings with attached garages.	APPROVED on the 10th January 2018.
P/15/0424	Discharge of Condition 7 (Construction Method Statement) 9 (Contaminated Land Investigation) and 10 (Ground Stability Investigation) of planning permission P/15/0259.	APPROVED on the 27th January 2016.
P/15/0259	Variation of a condition attached to planning permission P/11/0294 for residential development to extend the period of time for the submission of reserved matters.	APPROVED on the 15th October 2015.
P/13/0048	Removal of Condition 7 of Planning Permission P/11/0294, relating to the submission of a development phasing plan.	REFUSED on the 3rd May 2013.
P/11/0294	Erection of 6 no. detached dwelling (Outline).	APPROVED on the 19th October 2012.
P/11/0158	Erection of detached dwelling (Outline with some matters reserved).	REFUSED on the 21st October 2011.

- 3.2 The principle of developing the site for residential purposes is therefore firmly established by virtue of planning permission Ref: P/17/0245.

Pre-Application Discussions

- 3.3 A pre-application enquiry was submitted to Merthyr Tydfil County Borough Council on the 22nd February 2022 for the proposed residential development of 6no. dwellinghouses and 8no. flats and associated works (Ref: PA/22/0012).
- 3.4 The proposal comprised of the following mix:
- 6no. 2 bedroom house
 - 8no. 1 bedroom apartment
- 3.5 The pre-application proposal stated as follows:

"The dwellings will be positioned in linear arrangement to reflect the existing residential context along Kingsley Terrace. Frontage will be provided onto Kingsley Terrace with amenity areas positioned to the rear. The houses will be built to two storeys whilst the apartments will be split between two separate buildings with two flats positioned at ground floor and two at first floor. This will provide the appearance of detached dwellings.

The applicant is Merthyr Valley homes, a registered social landlord. As such, the proposed development will comprise 100% affordable housing. The mix of one-bedroom apartments and two-bedroom houses will ensure that the scheme caters to a wide range of persons with variety of needs. The proposal is supported by Merthyr Tydfil CBC's Housing Strategy Team and Social Housing Grant has been allocated for the development.

In respect of amenity, the dwellings are positioned approximately 17m from the frontage of dwellings along Kingsley Terrace. This is an increase of approximately 1.6m when compared to the build line of the dwellings approved by virtue of application P/17.0245.

Access will be attained directly off Kingsley Terrace with parking provided to the front of the dwellings. Parking will be provided at a rate of one space per bedroom which is in accordance with the Authority's adopted parking standards. The site is not currently served by a footpath along Kingsley Terrace. As such, it is proposed that a footpath is established along the site's frontage to ensure that pedestrian safety is protected. With a footpath of 1.8m, Kingsley Terrace will be reduced to 5.6m. It is considered that there remains

sufficient space to not adversely impact traffic travelling along the road.

The existing footpath which bisects the site and links Kingsley Terrace with Cross Street to the east will be retained to maintain pedestrian permeability and promote Active Travel.

The site layout illustrates that there is a significant scope for landscaping throughout the site."

- 3.6 A meeting was held with the planning officer on the 22nd March 2022 and a report was issued. A summary of the response and discussions is provided below along with a brief description of how the amended scheme has addressed the concerns raised:

Principle of development

- The site lies within the settlement boundary. The principle of developing the site for residential development is acceptable.

Design Approach

- The layout of proposed development responds to the context of the area
- Siting of the dwellings should not be closer to Kingsley terrace than approved in a previous application (P/17/0245) to maintain a privacy of the occupants opposite the site. Given that, the proposed dwellings should be set back from the road a further 1.7m in order to accommodate the driveways. As a result, proposed dwellings would be lying closer to the embankment and rear garden boundaries would be adjacent to the Taff Trail.

Response: As illustrated on the accompanying site layout, the dwellings will maintain the build line of approved application ref: P17/0245 and have been repositioned further west from the embankment and the Taff Trail.

- According to the aforementioned requirement, there is a need for a substantial retaining wall (approximately 2.2m high) to accommodate an elevated garden space. Supplementary 2m high fence is proposed along the top of the retaining wall.
- It has been noticed that due to the narrow nature of site the development can impact the character of the area by the loss of trees and vegetation leading to the exposure of urban environment to the Taff Trail.
- It has been advised that the rear garden boundaries should extend as far as the top of the existing embankment in order to maintain the

existing trees and vegetation as natural buffer. That would require positioning the dwellings closer to the road, in order to provide rear garden space. This would impact the parking facilities making it difficult to accommodate the proposed number of parking spaces. Given the above constraints, it is considered that the layout of the development would be better suited to 8 semi-detached houses rather than proposed 14 dwellings. It has been noted that detailed elevations of the proposed dwellings and their appearance within the street has to be provided as the development should correspond with the surrounding area.

- If new proposal incorporated reduced number of dwellings, a suitable walkway should be incorporated on either side of the development.
- Section details should be provided to illustrate the development in relation to the Kingsley Terrace to the west, Thomas Street to the east and Glan Y Nant to the south-east. Whilst the proposed scheme would not raise concerns in terms of overlooking and overbearing, the loss of vegetation may cause a significant impact on the surrounding area.

Response: Plans for the proposed retaining wall are provided which demonstrate that a Redi Rock wall system will be established. The proposed dwellings are now positioned further away from the embankment which has allowed the retention of more vegetation and trees to the rear of the site. This has been achieved through the reduction in the number of units to 8 no. semi-detached houses which allows parking at the side of the properties.

Landscaping

- It has been advised that a more comprehensive planting scheme should be provided instead of just grassed area to add further interest to the street scene and biodiversity value.
- Appropriate planting should be introduced along the garden boundaries to minimise potential overbearing impacts on the path crossing the site, which links to the Taff Trail.

Ecology Impacts

- It has been noted that the vegetation and trees along the eastern embankment are of ecological value and are of importance for foraging bats providing connective corridor to the surrounding area.
- It is suggested that 3m wide ecological buffer as featured in the previous permission should be incorporated into the layout design. It is recommended that the wooded corridor should be retained. Moreover, no large gaps in tree canopies should be created in order to stop further impact on habitat connectivity.

- A detailed landscaping plan should be provided in order to set out the location of the existing trees and to define the extent of the existing vegetation along the eastern embankment. That would allow for the assessment of the vegetation loss and its impact on the ecology.

Response: The proposed development has been amended significantly to reduce the number of units and reposition the dwellings further west allowing for a greater area of trees and vegetation to be retained along the embankment.

Engineering implications

- Concerns have been expressed by the highway engineers with regards to the narrowing of existing carriageway. More detailed analysis of proposed highway should be provided in terms of potential impact on existing residents and free movement of all forms of traffic.
- The requirements for parking space are as follows: 1 parking space for 1-bedroom flat and 2 parking spaces for 2-bedroom dwellings.

Response: The narrowing of the highway has been omitted from the proposals and parking is now to be provided down the side of properties. Parking provision in the proposed development is as follows: 2 parking spaces for 2-bedroom house and 2 parking spaces for 3-bedroom house.

Ground stability

- There is a necessity for providing the Coal Mining Risk Assessment given that the site lies within an area identified by the Coal Authority to be of high risk to past coal mining activities.

Response: A Coal Mining Risk assessment is provided to support the proposal.

Proposal

4.1 This chapter describes the extent of the proposed development.

Amount, Scale and Layout

4.2 The planning application seeks full planning permission for the development of 8no. dwellings and associated works. As shown on the accompanying layout plan, the schedule of accommodation on the proposed layout plan constitutes the following mix:

- 4 x 3 bedroom/5 person house (semi-detached)
- 4 x 2 bedroom/4 person house (semi-detached)

4.3 It is considered that the scheme represents an efficient use of land and the proposed development of the site will enhance the residential character of the surrounding area and will provide much needed affordable homes.

4.4 The type and size of dwellings required in the area has led to the mix of dwellings proposed, while clear separation distances and adequately sized tandem parking bays all contributed to the proposed layout. The scale and massing of the proposal replicates the immediate context and compliments the existing neighbouring buildings.

4.5 Houses are in a terraced format with north-east facing rain gardens for Sustainable Drainage System (SuDS) design and south-east facing gardens for daytime and early morning sun. Aspects will be directed towards the streets to provide an excellent level of natural surveillance. Rear gardens to houses back onto the watercourse.

4.6 Due to the sloped nature of the site at the north-eastern boundary, a retaining wall is required to accommodate elevated garden space.

4.7 The proposal includes 2m wide tarmacadam footway fronting development to adoptable standards. The existing path between plots 6 and 7 will be retained and new landscaping borders will be provided to enhance bio-diversity.

4.8 From the above, it is clear that the proposal provides a positive development which is appropriate and relevant to the immediate area.

Access and Parking

- 4.9 Access will be attained directly off Kingsley Terrace with parking provided on the sides of the dwellings. Parking will be provided at a rate of two spaces per each two- and three- bedroom dwelling. The site is not currently served by a footpath along Kingsley Terrace. As such, it is proposed that a footpath is established along the site's frontage to ensure that pedestrian safety is protected. It is considered that there remains sufficient space to not adversely impact traffic travelling along the road.
- 4.10 The accompanying Sustainability Assessment identifies that the site achieves a score of 7 points. The score for this site has been calculated as follows:
- Local Facilities: The site is located within 200m of convenience store. In addition, the site is within 800m of Aberfan Surgery, Aberfan Post Office, Ysgol Rhyd Y Grug Primary School and the Aberfan Takeaway = 2 points.
 - Public Transport: the site is within 300m of a bus stop and within 800m of a railway station = 3 points
 - Cycle route within 200m to the east of the site = 1 point.
 - Frequency of Public Transport: Service 81, 78, 78A every 30 minutes = 1 point.
- 4.11 On this basis a slight reduction in car parking provision for the 3 bedroom properties from that set out in the SPG is considered to be appropriate.
- 4.12 The proposal has regard for the safe, effective and efficient use of the transportation network; priority is given to pedestrian, cyclists and public transport; there is provision for people with special access and mobility requirements and car parking and appropriate servicing and operational space is provided.

Appearance

- 4.13 A select palette of materials is proposed which recognises the vernacular of the local area. It is intended to create a development that acknowledges its context whilst enhancing the wider area through distinct design choices to create a contemporary aesthetic.

Landscaping and Biodiversity

- 4.14 The proposed planting strategy seeks to enhance the landscape setting for this site and continue the green infrastructure for the location into the wider environment.

Drainage

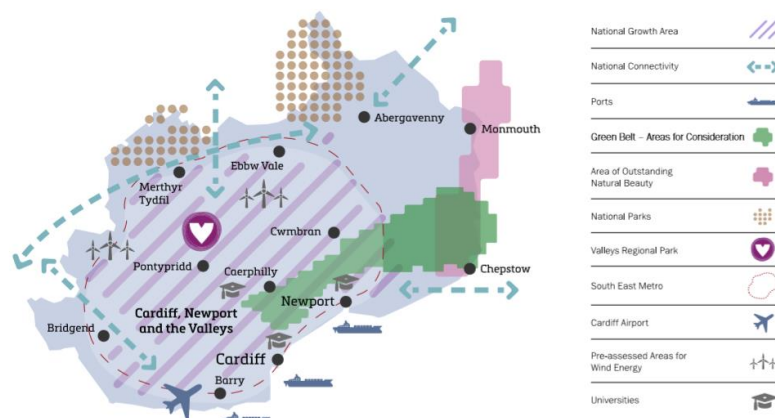
- 4.15 The surface water run-off is to be managed through the use of Sustainable Drainage Systems (SuDS) integrated with the landscape strategy.

Planning Policy Context

- 5.1 The planning policy framework for the determination of this application is provided by national planning guidance, together with the statutory 'development plan'.
- 5.2 National planning policy is contained within Future Wales and the eleventh edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2021. PPW is supported by 21 topic-based Technical Advice Notes (TANs), which are also relevant. The statutory 'development plan' for this site is currently provided by Merthyr Tydfil County Borough Replacement Local Development Plan (LDP) which was adopted in January 2020. The Replacement LDP is a material consideration despite not being formally adopted.

Future Wales: The National Plan 2040

- 5.3 Future Wales: The National Plan 2040 was adopted in February 2021 and replaces the Wales Spatial Plan (WSP) and provides a framework for the future spatial development of Wales. Future Wales comprises the first development plan of its kind within Wales. It is a development plan with 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.
- 5.4 Future Wales sets a number of outcomes which when taken together form a vision for change over the next 20 years. The Plan sets out a vision for different areas of Wales. The south-east region is considered to be a National Growth Area comprising:
- Cardiff, Newport and the Valleys
 - Swansea Bay and Llanelli
 - Wrexham and Deeside



5.5 The Valleys area, covering Aberfan, is a priority area for the Welsh Government and should be a priority for the Strategic Development Plan. Cardiff, Newport and the Valleys are identified in policy 1 as a National Growth Area where development will be directed. This will be supported by policies 2, 3, 6 and 8 which will ensure that development is sustainably located with easy access to public transport and other public services.

5.6 Policy 7 sets out the national strategic approach to delivering affordable housing and ensures the focus of funding and housing policies is on driving increased provision. Planning and co-ordinating the delivery of new housing to meet identified needs is an important task for the regional planning process. Under the Welsh Government central estimates 66,400 additional homes are needed in the region until 2039 and over the initial five years (2019-20 to 2023-24) 48% of the additional homes needed should be affordable homes.

5.7 The Plan also states that:

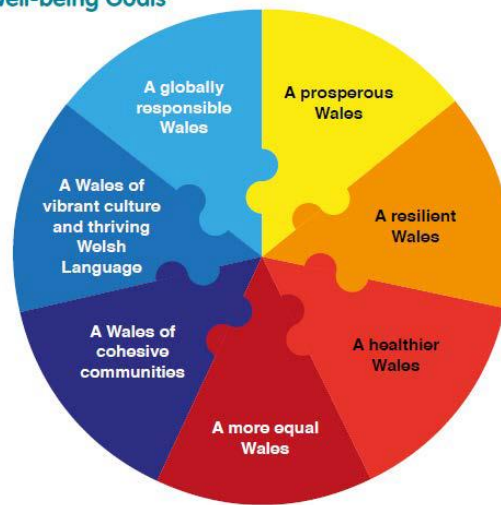
"The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys' strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.

The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys."

Well-being and Future Generations (Wales) Act 2015

5.8 The Well-being of Future Generations (Wales) Act came into force in 2015 and seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act puts in place seven well-being goals in order to make sure that everyone works towards the same vision. The well-being goals are set out below and must be considered at an early stage in the design process.

Well-being Goals



Planning Policy Wales (Edition 11, February 2021)

- 5.9 Planning Policy Wales (PPW) – Edition 11 (February 2021) is the principal document which sets out the land use policy context of the Welsh Government. Its primary objective is to ensure that the planning system itself contributes towards the delivery of sustainable development whilst improving the social, economic, environmental and cultural well-being of Wales, as required by the Well-being of Future Generations Act 2015 and other pertinent legislation.
- 5.10 The planning system is central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage the use and development of land in the public interest which is consistent with key sustainability principles.
- 5.11 Section 3 – Strategic and Spatial Choices, states that effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. The policy issues should not be considered in isolation from one another. Paragraph 3.3 states:

“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.”

- 5.12 Paragraphs 3.5 and 3.6 of PPW relates to Access and Inclusivity and state:

“Good design is inclusive design. Development proposals should place people at the heart of the design process, acknowledge diversity and

difference, offer choice where a single design solution cannot accommodate all users, provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for everyone.

Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children. There will often be wider benefits to be gained through the sensitive consideration of such provision, for example, whilst the presence of visual cues will be invaluable in assisting those with hearing loss to engage in a noisy environment, a navigable environment will benefit all. Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport."

5.13 Paragraph 4.2.2. is in relation to the Planning system's role in housing and states:

- *"identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- *enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and*
- *focus on the delivery of the identified housing requirement and the related land supply."*

5.14 In respect of Affordable Housing, paragraph 4.2.25 states:

"A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications. Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers."

Technical Advice Notes (TANs)

- 5.15 PPW is supplemented by a series of topic specific Technical Advice Notes (TANs) including the following:

Technical Advice Note 2: Planning and Affordable Housing (2006)

- 5.16 TAN 2 provides advice and guidance on Planning and Affordable Housing. It states the importance of the role of the local authority in setting a target for affordable housing based on Local Housing Market Assessments (LHMA). Furthermore, the importance of carefully assessing whether the size and tenure of affordable housing reflects the identified need is emphasised. Paragraph 11 refers to the design of affordable housing reflects the identified need is emphasised. Paragraph 11 refers to the design of affordable housing. Here, planning policy Wales' design objectives are highlighted as ones which '**apply equally to market housing and to affordable housing, the overriding principle being to establish a sense of place and community**'.

Technical Advice Note 12: Design (2016)

- 5.17 In defining the notion of design, paragraph 2.1 states that it can help in articulating our nation and culture whilst helping in sustaining a positive image of Wales.

Paragraph 2.5 warns that 'good design is not inevitable', in order to achieve it, it must embrace sustainability, architecture, place making, public realm, landscape, and infrastructure. Furthermore, the five objectives of good design are highlighted;

- Access;
- Character;
- Community Safety;
- Environmental Sustainability; and
- Movement.

Merthyr Tydfil County Borough Council Local Development Plan

- 5.18 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 the pre-application site is provided in the Merthyr Tydfil Local Development Plan (2016 - 2031).
- 5.19 Merthyr's LDP Proposals Map shows that the site is located within Settlement Boundary (SW4) and is located for residential development (Policy SW3). To the east runs a Proposed Active Travel Integrated Network Map route (Policy SW12).

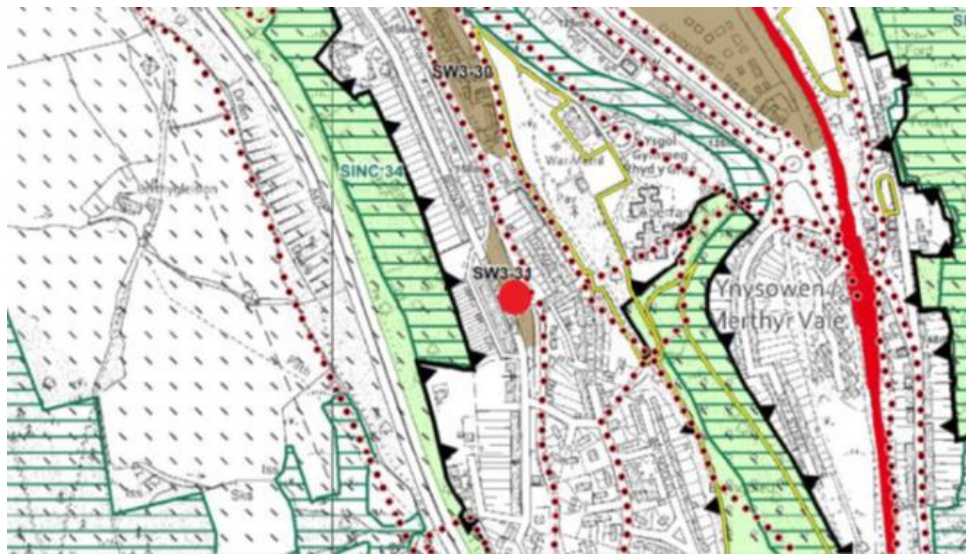


Figure 1: Merthyr Tydfil CBC LDP Proposals Map Extract

- 5.20 In light of the above, the following policies are considered to be of relevance within the LDP:

Policy reference	Relating to
<i>Improving our Social Well-being</i>	
SW1	<i>Provision of New Homes</i>
SW2	<i>Provision of Affordable Housing</i>
SW3	<i>Sustainably Distributing New Homes</i>
SW4	<i>Settlement Boundaries</i>
SW9	<i>Planning Obligations</i>
SW11	<i>Sustainable Design & Placemaking</i>
SW12	<i>Improving the Transport Network</i>
EnW1	<i>Nature Conservation & Ecosystem Resilience</i>

- 5.21 All new developments must adhere to the requirements of Policy DM1 (New Development) which advises development proposals will be permitted provided they comply with the following criteria:

1. Sustainable Design

- a) *Energy efficient design is achieved;*
- b) *The proposal makes efficient and effective use of resources by employing sustainable building techniques, incorporating energy and water conservation measures, and wherever possible, the use of renewable energy;*
- c) *Construction waste and pollution is minimised and the proposal incorporates facilities for the segregation, recovery and recycling of waste;*
- d) *Recycled or sustainable products and resources are used in construction, where practicable;*
- e) *The proposal reduces surface water run off through minimising an increase in impermeable surfaces and using Sustainable Drainage systems, where appropriate; and*
- f) *The proposal does not result in a net loss of biodiversity and provides where necessary mitigation and/or compensation measures.*

2. Amenity

- a) *The development would be compatible with other uses in the locality;*
- b) *There would be no unacceptable adverse visual impact on townscape or landscape;*
- c) *There would be no unacceptable impact upon the amenities of neighbouring occupiers;*
- d) *In the case of residential development including extensions and sub-division of dwellings, dwellings must be of appropriate size to provide satisfactory levels of amenity;*
- e) *There would be no adverse impact upon the water environment or an unacceptable risk to the quality of controlled waters (including groundwater and surface water);*
- f) *The proposal contributes to improving water quality wherever practicable;*
- g) *The proposal does not result in airborne emissions which have an unacceptable effect on the health, amenity or natural environment of the surrounding area, taking into account cumulative effects of other proposed or existing sources of air pollution in the vicinity.*
- h) *There would be no unacceptable risk of harm to health and/or local amenity from unacceptably high levels of noise, vibration, odour or light pollution;*
- i) *The land is made stable and capable of supporting the development without risk of damage to buildings on the site or adjoining land; and*

- j) *Practicable and effective measures are taken to treat, contain or control any contamination.*

3. Accessibility

- a) *The proposal has regard for the safe, effective and efficient use of the transportation network;*
- b) *The proposal ensures that developments are designed to an appropriate standard that prioritises the interests of pedestrians, cyclists and public transport before that of the private car;*
- c) *The proposal secures appropriate provision for people with special access and mobility requirements;*
- d) *Parking, appropriate servicing and operational space has been provided; and*
- e) *Where a Transport Assessment and Travel Plan is required by national planning policy, they must demonstrate that there will be no adverse impact on trip generation and travel demand.*

5.22 Policy SW1: Provision of New Homes

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

5.23 Policy SW2: Provision of Affordable housing

253 affordable dwellings are expected to be delivered across the County Borough in order to contribute to the identified housing need.

5.24 Policy SW3: Sustainably Distributing New Homes

New homes will be concentrated within the main settlement of Merthyr Tydfil. New homes will also be directed to our other settlements of Troedyrhiw, Merthyr Vale and Aberfan, Bedlinog, and Edwardsville, Quakers Yard, Trelewis and Treharris. The following sites are allocated for residential development within the 'Other Growth Area':

Site No.	Site Name	Dwellings	Indicative Delivery Timescale
29	Project Riverside, Merthyr Vale	153	2020-2023
30	Walters Terrace, Aberfan	23	2018
31	Opposite Kingsley Terrace, Aberfan	12	2020-2022
32	Adjacent to Manor View, Trelewis	248	2017-2029
33	Stormtown, Trelewis	80	2028-2031
34	Cilhaul, Treharris	30	2024-2025
35	Oaklands, Treharris	50	2025-2027
36	Y Goedwig, Edwardsville	22	2014-2026
	Sub Total	618	

- 5.25 *Policy SW4: Settlement Boundaries*
To encourage development within urban areas, support the re-use of previously developed land, and to protect and support the functioning of our rural economy and the countryside, settlement boundaries will be defined as follows:
- Primary Growth Area:
- Merthyr Tydfil
 - Trefechan
- Other Growth Areas
- Troedyrhiw
 - **Aberfan** and Merthyr Vale
 - Quakers Yard, Edwardsville, Treharris and Trelewis
 - Bedlinog
- 5.26 *Policy SW9: Planning Obligations*
All new development in the County Borough will be supported by infrastructure that helps to create sustainable places.
- 5.27 *Policy SW11: Sustainable Design and Placemaking*
Development must contribute to the creation of attractive and sustainable places through high quality, inclusive and sustainable design.
- 5.28 *Policy SW12: Improving the Transport Network*
Development supporting a modal shift towards sustainable transport will be supported. Proposals will need to demonstrate how they reduce the need to travel.
- 5.29 *Policy EnW1: Nature Conservation and Ecosystem Resilience*
Proposed developments are required to promote the resilience of ecosystems by maintaining biodiversity.
- 5.30 Policy EnW2: Internationally and Nationally Protected Sites and Species
Developments likely to have an impact on the conservation value will be only permitted where it is demonstrated that:
- "1. There is no suitable alternative to the proposed development; and*
 - 2. It can be demonstrated that the benefits from the development clearly outweigh the special interest of the site; and*
 - 3. Appropriate compensatory measures are secured; or*
 - 4. The proposal contributes to the protection, enhancement and positive management of the site."*

Supplementary Planning Guidance (SPG)

5.31 The following Supplementary Planning Guidance documents adopted by Merthyr Tydfil CBC are considered relevant of this pre-application enquiry:

- Guidance Note No. 1 – Affordable Housing
- Guidance Note No. 4 – Sustainable Design
- Guidance Note No. 5 – Nature and Development

Appraisal

Overview

- 6.1 This section serves as an appraisal of the proposed development against the established policy framework and other material considerations, as well as drawing together the key points and conclusions from the proposals in order to demonstrate the appropriateness of the proposal in planning terms.

The key issues are identified as follows:

- The **principle of development** in terms of development plan policy and other planning context;
- The impact of the development on the **residential amenity of surrounding properties**;
- The impact of the development on the **character and appearance of the surrounding area**;
- The acceptability of the development in terms of **sustainable transport and car parking**; and
- Other **material considerations**

The Principle of the Development

- 6.2 The proposed development comprises affordable housing. It will therefore cater to a wide range of persons with varying needs. As previously identified, the proposal is supported by Merthyr Tydfil CBC's Housing Strategy Team and Social Housing Grant has been allocated for the development. The proposed development is therefore in accordance with paragraphs 4.2.2, 4.2.5 and 4.2.25 of PPW which state that the planning system must support the delivery of housing to meet the differing needs of communities and emphasises the community's need for affordable housing.
- 6.3 Within the adopted LDP, the site is allocated for residential development comprising 12no. dwellings in accordance with Policy SW3 (Sustainably Distributing New Homes). In addition, the site possesses extant consent (Ref: P/17/0245) for residential development of 8no. 3-bedroom dwellings.
- 6.4 In light of the above, the principle of developing the site for residential purposes is firmly established. The proposal is considered to be in accordance with PPW (11th edition) and key LDP policies such as SW1, SW2, SW3, SW4 and SW11 and SW12.

The impact of the development on the residential amenity of surrounding properties;

- 6.5 With regards to residential amenity, new proposal reflects the build line of the approved scheme (Ref: P/17/0245). It is evident from pre-application discussions with Merthyr Tydfil County Borough Council that the principle of developing 8no. residential dwellings is acceptable and the proposed layout ensures the scheme can enhance this area of Aberfan whilst being respectable to its surroundings.

The impact of the development on the character and appearance of the surrounding area;

- 6.6 The key policy consideration whilst assessing the impact of the proposed development upon the character and appearance of the surrounding area is the content of Merthyr Tydfil County Borough Council LDP Policy SW1 (Provision of New Homes).
- 6.7 The application is accompanied by elevations which illustrate that the dwellings will be traditionally designed featuring brick facades and a reconstituted slate roof finish.
- 6.8 The scale of the houses will be two storeys to ensure that the proposed development will not result in an overbearing impact on existing properties along Kingsley Terrace. The proposed scale and massing of the proposal replicates the immediate setting and compliments the existing neighbouring buildings.
- 6.9 By incorporating landscaping and SUDs features, this will ensure that the character of the area is maintained whilst also ensuring the recommendations contained in the ecological and structural reports are fully adhered to. It also ensures that the land to the east is not compromised by the development.
- 6.10 Ultimately, it is considered that proposals will not negatively impact upon the character and appearance of the surrounding area. Indeed, it is considered that the proposals will positively contribute to the surrounding character whilst complying with key LDP Policy SW11, TAN 12: Design as well as key elements of PPW and the Well-being of Future Generations Act, within which sustainable development, health and environmental considerations drive discussions. Proposals at this site constitute a well detailed scheme which respects its siting within an established residential area within Aberfan.

The acceptability of the development in terms of sustainable transport and car parking

- 6.11 As detailed on the proposed site layout plan, the proposal incorporates 2no. parking spaces per 2-bedroom house and 2no. parking spaces per 3-bedroom house which represents a slight reduction from the Council's adopted standards for the 3-bedroom houses. As evidenced within the accompanying Sustainability Assessment, the site lies in a sustainable location and the reduction is therefore considered acceptable.
- 6.12 The site is not currently served by a footpath along Kingsley Terrace. As such, it is proposed that a footpath is established along the site's frontage to ensure that pedestrian safety is protected. It is considered that there remains sufficient space to not adversely impact traffic travelling along the road.
- 6.13 In respect of sustainable forms of transport, a bus stop located along Walters Terrace and Merthyr Vale train station are positioned 100m and 400m to the east respectively. The site also possesses good pedestrian permeability and is accessible to an array of services and facilities along Bronheulog Terrace approximately 660m to the north. The site therefore lies in a sustainable location. The proposal can therefore be considered to be in accordance with TAN 18: Transport, LDP policy SW1 and CSS Wales – Wales Parking Standards 2014.

Other material considerations

- 6.14 Ecology
It is acknowledged that the site possesses the potential to be occupied by biodiversity. The accompanying Preliminary Ecological Appraisal has concluded that the site supports common and widespread species and has no significance for wildlife and are of limited botanical diversity. The habitats at the site were considered suitable to support locally foraging and commuting bats, nesting birds and, to a lower extent, common reptiles. The proposed layout plan specifies that the majority of boundary features will be retained with development focused within areas of low ecological importance and maintaining a buffer to the small watercourse and wooded corridor. The following mitigation and enhancement measures are considered appropriate to the current proposal.
- 6.16 A series of ecological enhancements are recommended in the Preliminary Ecological Appraisal including bird boxes and bat bricks which have been incorporated into the site layout.

Conclusion

- 7.1 This Planning Statement has been produced on behalf of M. Delacey & Sons to accompany the full planning application for residential development and associated works on land to the east of Kingsley Terrace, Aberfan, Merthyr Tydfil.
- 7.2 The proposals have been subject to pre-application discussions with Merthyr Tydfil County Borough Council in order to establish a preferred design solution which contributes to a proven need for housing. The planning application has been supported by a suite of studies which have confirmed that the proposal meets all acceptable provisions embodied in Future Wales, Planning Policy Wales, policies in the adopted Merthyr Tydfil County Borough Council Local Development Plan and associated supplementary planning guidance. The design and layout fully adhere to placemaking principles and is considered to also be fully compatible with Wellbeing principles, as contained within the Future Generations Act.
- 7.3 It is for these reasons that it is respectfully requested that Merthyr Tydfil County Borough Council grant full planning permission for the development, as proposed.