

INTERNAL MEMORANDUM

To: Caroline Pulley - Development Management Case Officer

Reference: P/20/0288

From: Planning Policy and Implementation Section

Please ask for: Natasha Lade

Extension: 6220

Date: 23rd December 2020

Policy observations in respect of the request for advice on planning application number P/20/0288 at the site of former St Luke's Church, Lansbury Road, the former Gellideg Family Centre, 1-2 Heol Parc-y-Lan, Gellideg Estate and land adjacent to Taf Fechan House, Gellideg, Merthyr Tydfil CF48 1HA.

1. Proposed Development

An application has been submitted for the demolition of an existing building, the construction of four buildings comprising two bungalows, eight flats and two dwellings with landscaping, car parking, drainage arrangements and a new play area at the sites of the former St Luke's Church and the Gellideg Family Centre and land adjacent to Taf Fechan House, Gellideg, Merthyr Tydfil.

2. Development Plan Framework

National Planning Policy

Planning Policy Wales (Edition 10, December 2018)

Planning Policy Wales provide guidance on matters relevant to this application, namely:

- Strategic & Spatial Choices: (Paragraph 3.5 – 12 - 14, 17, 3.20 - 22 & 23).
- Active and Social Places: Sustainable Transport (Paragraphs 4.1.9, 10, 17-22, 31, 33 – 35, 37 & 38), Car Parking (Paragraphs 4.1.50-52), Housing (Paragraph 4.2.17, 25 - 27), Community Facilities (Paragraph 4.4.1) & Recreational spaces (Paragraph 4.5.1, 3 & 4).
- Productive and Enterprising Places: Sustainable Buildings (Paragraphs 5.8.1 - 6).
- Distinctive and Natural Places: The Historic Environment (Paragraphs 6.1.29); Integrating Green Infrastructure and Development (Paragraph 6.2.4 & 5); Framework for Addressing Air Quality and Soundscape (Paragraphs 6.7.24, 6.6.7-8, 14 & 26) and Lighting (Paragraphs 6.8.3 & 4).

Technical Advice Note 12 Design (March 2016)

Technical Advice Note 18: Transport ((March 2007)

Technical Advice Note 16: Sport, Recreation and Open-space (January 2009)

Local Planning Policy Framework

The Merthyr Tydfil County Borough Council Replacement Local Development Plan (2016 - 2031)

The relevant LDP Objectives are -

- *LDP Objective 1: To encourage a sustainable level and distribution of growth.*
- *LDP Objective 3: To ensure the sufficient provision of land for the delivery of a range and choice of housing and affordable housing to address local housing needs.*
- *LDP Objective 4: To promote the reuse of previously developed land and the continued regeneration of communities.*
- *LDP Objective 5 - Infrastructure: To ensure that community infrastructure and open space supports the regeneration of local communities.*
- *LDP Objective 6: To promote high quality, sustainable and inclusive design and support measures, which mitigate the predicted effects of climate, change.*
- *LDP Objective7: To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links.*
- *LDP Objective 9: To protect, enhance and promote all heritage, historic and cultural assets.*
- *LDP Objective 18: To promote the efficient use of resources and ensure an integrated network of waste management facilities.*

The following local development plan policies would apply: -

- *Policy SW1: Provision of New Homes.*
- *Policy SW3: Sustainably Distributing New Homes.*
- *Policy SW4: Settlement Boundaries.*
- *Policy SW9: Planning Obligations.*
- *Policy SW10: Protecting and Improving Open Spaces.*
- *Policy SW11: Sustainable Design and Placemaking.*
- *Policy SW12: Improving the Transport Network.*
- *Policy SW13: Community Facilities.*
- *Policy CW1: The Historic Environment.*
- *Policy EnW1: Nature Conservation and Ecosystem Resilience.*
- *Policy EnW4: Environmental Protection and*
- *Policy EnW5: Landscape Protection.*

The following Supplementary Planning Guidance and other Guidance is also applicable: -

- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 1: Affordable Housing (March 2012).*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 2: Planning Obligations (March 2012).*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 4: Sustainable Design (July 2013).*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 5: Nature and Development (May 2015).*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 6: A Design Guide for Householder Development (September 2015).*
- *Merthyr Tydfil: Understanding Urban Character Areas, Cadw (2015).*

3. Policy Considerations

The Council has formally adopted the Merthyr Tydfil County Borough Council Replacement Local Development Plan (2016 - 2031) and the proposals have therefore been considered against the policies contained within it.

The application site comprising the site of the former St. Luke's Church and church Hall, the former Gellideg Family Centre and land adjacent to Taf Fechan House is located within the residential Gellideg Estate, which lies within the *Primary Growth Area* settlement boundary, where Policies SW1, SW3 and SW4 apply. Here new residential development is considered acceptable in principle; subject to the proposal, being compatible with the Plan's other policies and all other material considerations.

Policy SW2 states that development proposals will be expected to deliver up to 253 affordable dwellings across the County Borough in order to contribute to the identified level of housing need. The proposal comprises 12 new affordable housing units representing a contribution towards the affordable housing requirement within the plan period. As such, the proposal complies with Policy SW2.

Policy SW9 states that where appropriate and having regard to development viability, planning obligations will be sought on sites of 10 homes or more within the Primary Growth Area for:

- 10% on site provision of affordable housing or
- where on-site provision is not appropriate a financial contribution towards the provision of affordable housing and
- the provision of open space where there is an identified need.

Given that all 12 units are for affordable housing this would satisfactorily meet the affordable housing requirement and thereby comply with this part of the policy. With regard to open space provision part of the site sited to the west of the church building comprises an area of the Gellideg Play Space / Kick about, a designated

area of open space described in the Council's Open Space Strategy as a Children and Young People's Play Space to which Policy SW10 also applies. Here development proposals resulting in the loss of green space will only be permitted in the following circumstances where:

- It would not cause or exacerbate a deficiency of open space in accordance with the Council's open space standards or;
- The majority of the open space can best be retained and enhanced through the redevelopment of a small part of the site or;
- Satisfactory equivalent community benefit or enhanced compensatory provision can be provided in accordance with the Council's open space standards and
- In all cases, the open space has no significant nature or historic conservation importance.

It appears from the Design and Access Statement that off-site replacement play provision is proposed 100m to the west of the existing play space on land along Heol Tai Mawr. In order to assess if this satisfactorily complies with Policies SW9 and SW10, in relation to open space provision, the views of the Council's Landscape Architect are required. Also of relevance, Community Infrastructure Levy (CIL) is chargeable on residential development in this part of the County Borough.

The former Gellideg Family Centre and the former St. Luke's Church are considered to be community facilities, for which Policy SW13 would apply. However, the family Centre moved into Thomastown House, Queens Road, in 2015, renamed as the Merthyr Tydfil Family Centre, whilst the existing premises, comprising two former residential properties, appear to be occupied by offices for the Gellideg Foundation and if this is the case, Policy SW13 would not be applicable. It is also understood that St. Luke's church and hall are now vacant although it is not clear for how long this has been the case. This should be confirmed to ensure there is no loss of community facility and so that the development is in full compliance with this policy.

The site lies within the West Merthyr (including Heolgerrig and Gellideg) Urban Character Area (UCA9) and the Merthyr Tydfil Landscape of Historic Interest in Wales; accordingly, Policy CW1, which states that proposals should have regard to their special character and archaeological importance, and the views of the Conservation Officer are of relevance.

As the site lies within an existing residential area and proximity of and other uses, including commercial, careful consideration should be had to Policy SW11. It advises that development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design and where appropriate, new development will be required, amongst other things, to -

- be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density.
- integrate effectively with adjacent spaces, the public realm and historic environment to enhance the general street scene and create good quality townscape.

- not result in an unacceptable impact on local amenity, loss of light or privacy, or visual impact, and incorporate a good standard of landscape design.
- contribute to the provision of green infrastructure, including open space in accordance with the Council's standards, sustainable drainage systems where appropriate, and ensure that the County Borough's network of green infrastructure is accessible and connected.
- allow access for the widest range of people possible and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards.
- Incorporate resource efficient/adaptable buildings and layouts using sustainable design and construction techniques.
- provide and protect utility services and infrastructure without causing any unacceptable environmental impacts.
- incorporate measures to improve ground and surface water quality wherever possible.
- provide adequate facilities and space for waste collections and recycling and
- promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour.

Policy SW12 recognises the Transport Hierarchy as outlined in PPW10, which supports development that encourages a modal shift towards sustainable transport and therefore development proposals should demonstrate how they can reduce the need to travel and encourage the use of sustainable transport. Given that the submitted plans indicate that the development would include 20 off-street parking spaces, which should be checked against the Council's current parking standards, and vehicular access to and from the various sites, the views of the Highways and Drainage Engineer should be sought.

Policy EnW4 states that development proposals will be required to demonstrate that they would not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:

- Pollution of land, surface water, ground water and the air.
- Land contamination.
- Hazardous substances.
- Land stability.
- Noise, vibration, dust, odour nuisance and light pollution; or
- Any other identified risk to public health and safety.

To this end the views of the Public Health Officer should be sought. Where impacts are identified the applicant should be required to demonstrate that appropriate measures can be incorporated to reduce, or minimise the impact identified to the lowest possible acceptable level. Planning conditions may be imposed, or legal obligation requested to secure any necessary mitigation and monitoring processes both during and post construction. With respect to the water environment, development proposals will be required to incorporate measures to improve water quality where opportunities exist and all new developments of more than one dwelling house will require SUDs for surface water that meets the statutory sustainable drainage standards set by Welsh Government.

Finally, Policy EnW5 provides a wider landscape protection policy, which should also be considered. Amongst other things, the Policy states that development proposals will only be permitted where it can be satisfactorily demonstrated that: development secures the enhancement of the character, appearance and quality of the landscape, through restoration, management or enhancement where possible, and where damage to local landscape character cannot be avoided appropriate mitigation has been secured. Given that there are a number of green spaces within the application sites, the views of the Council's Landscape Architect and Ecologist are of relevance.