



Pengarnddu Service Reservoir

Planning Statement

September 2020



Pengarnddu Service Reservoir

Planning Statement

September 2020

Mott MacDonald
10 Temple Back
Bristol BS1 6FL
United Kingdom

T +44 (0)117 906 9500
mottmac.com

Pengarnddu Service Reservoir

Planning Statement

September 2020

Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
P01	02/07/20	I Brumwell	S Campbell	J Holbrook	Draft for Issue
P02	15/09/20	I Brumwell	S Campbell	J Holbrook	For Issue

Document reference: B10237-123532-XX-XX-RP-TA-DH0109 | P02

Information class: Standard

This document is issued for the party which commissioned it and for specific purposes connected with the above-captioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.

Contents

1	Introduction	1
1.1	Environmental Impact Assessment	1
1.2	Other consents	2
1.3	Land ownership	2
1.4	Consultation	2
1.4.1	Pre-application meetings	2
2	Site Description and Planning History	5
2.1	Site Description	5
2.1.1	Designations	5
2.2	Surroundings	5
2.2.1	Historic Environment	5
2.3	Planning History	5
3	Proposed Development	8
3.1	Need for the Scheme	8
3.2	Proposed Scheme	8
3.2.1	Objectives of the Scheme	8
3.2.2	Optioneering	8
3.2.3	The proposed Scheme	8
3.3	Construction of the Scheme	9
3.3.1	Site compounds	9
3.3.2	Construction access routes	9
3.3.3	Construction strategy and methodology	9
4	Planning Policy Context	11
4.1	Introduction	11
4.2	National policy frameworks	11
4.2.1	Planning Policy Wales (PPW)	11
4.3	Local Development Framework	13
4.3.1	Merthyr Tydfil Replacement Local Development Plan (LDP)	13
4.3.2	Local Plan Saved Policies	15
4.4	Other relevant plans, policies and guidance	15
4.4.1	Supplementary planning Guidance	15
5	Planning Assessment	16
5.1	Principal of development	16
5.2	Historic Environment	16

5.2.1	Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL2)	16
5.2.2	Listed Buildings	17
5.3	Trees	17
5.4	Ecology	17
5.4.1	Blaenmorlais Site of Importance for Nature Conservation	18
5.5	Landscape	18
5.5.1	Landscape and Visual Impact Assessment (LVIA)	18
5.6	Contaminated Land	19
5.7	Water resources, flood risk, and drainage	19
5.8	Construction phase	19
5.8.1	Impact on local amenity	19
5.8.2	Noise management	19
5.8.3	Control of lighting	20
5.8.4	Dust and Air Quality Control	20
5.8.5	Pollution control measures	20
5.8.6	Imported materials	20
5.8.7	Advertising proposed works	20
5.9	Public Consultation	21

Tables

Table 1.1: Supporting documents	1
Table 1.2: Summary of comments from MTCBC	3
Table 2.1: Planning history within the redline boundary	5
Table 2.2: Relevant planning history outside the redline boundary	6
Table 3.1: Key component details	9
Table 3.2: Details of deliveries	10
Table 3.3: Indicative sequence of construction activities	10
Table 4.1: Relevant PPW policies	11
Table 4.2: Relevant LDP Policies	13

1 Introduction

This planning statement has been prepared on behalf of Welsh Water (WW) in support of the planning application for the New Service Reservoir and associated works at Pengarnddu Service Reservoir, Merthyr Tydfil (referred to hereafter as “the Scheme”).

An increase in the storage capacity of the existing Pengarnddu Service Reservoir (PSRv) is required to address a regulatory notice served by the Drinking Water Inspectorate (DWI). The carrying out of a manned internal inspection is also required to address the outstanding requirements of a notice served by the DWI in 2010.

The chosen solution to address both of the DWI’s requirements is to construct a new 9ML (operational capacity) 2-cell Reservoir (approximately 61m x 50m) with abutting embankment and one-story concrete valve house adjacent to the existing Pengarnddu Service Reservoir. This New Service Reservoir (NSR) will provide the required additional storage capacity required and will enable a manned internal inspection of the existing PSRv to be carried out.

The existing boundary of PSRv will be extended to include the NSR, extension to existing access road, and footpaths that will be provided. Both the additional land and the land within the existing boundary of the PRSv site (referred to hereafter as “the Site”) will be enclosed with secure fencing.

Table 1.1 below outlines the documents provided in support of this planning application.

Table 1.1: Supporting documents

Document/Drawings	Reference
Application Form	N/A
Cover Letter	B10237-123532-XX-XX-RP-TA-DH0112
Planning Statement	B10237-123532-XX-XX-RP-TA-DH0109
Pre-Application Consultation Report (PAC Report)	B10237-123532-XX-XX-RP-TA-DH0111
Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL2)	B10237-123532-XX-XX-RP-YA-DH0107
Landscape and Visual Impact Assessment (LVIA)	B10237-123532-ZZ-XX-RP-LA-DH0100
Ecological Impact Assessment Report (EcIA)	B10237-123532-XX-XX-RP-NB-DH108
Contract Management Plan	BIMS 02-08.01DCWW CMP Rev B
Location Plan	B10237-123532-ZZ-XX-PL-ZA-PN0067
Existing Site Plan	B10237-123532-ZZ-XX-DR-ZA-PN0068
Proposed Site Plan	B10237-123532-ZZ-XX-DR-ZA-PN0069
Proposed Site Section	B10237-123532-XX-XX-DR-LA-DI9004
Landscaping and Planting General Arrangement	B10237-123532-XX-XX-DR-LA-DI9003

1.1 Environmental Impact Assessment

The proposed Scheme falls under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment (EIA)) (Wales) Regulations 2017. Projects listed on Schedule 2 of these EIA regulations only require the preparation of a statutory EIA if they are likely to have a significant impact on the environment by virtue of factors such as the size, nature or location of the proposals.

A screening opinion request was submitted by MMB on behalf of WW on 4th February 2020. Merthyr Tydfil County Borough Council (MTCBC) provided a formal scoping opinion on 11th March 2020 (letter reference: DAC/Screening Req/Op 2020) which determined that the preparation of a statutory EIA is not required.

1.2 Other consents

Planning permission is the primary consent being sought. A number of other consents and authorisations will be required in order to implement the development, including:

- Ordinary Water Consent for the construction of the headwall from MTCBC; and
- Consent for the surface water drainage system for the new areas of hardstanding (the new SRv roof and the extension of the existing access road) from the Sustainable Drainage Body (SAB).

1.3 Land ownership

WW own all land within the site boundary. A portion of the site is registered as common land and forms part of Merthyr Common. Separate consent to unregister/release this Common Land will be sought from the Planning Inspectorate under Section 38 of the Commons Act 2006 to enable development.

As the Scheme will result in a loss of this Common Land, the provision of an alternative (larger) area of land to compensate for the loss has been discussed with the Commoner's Association.

The relevant notices have been served on applicable interested parties and ownership certificates have been submitted as part of this application.

1.4 Consultation

In March 2016, key elements of the Planning (Wales) Act 2015 were implemented, including a need for developers to carry out statutory pre-application consultation on planning applications for major developments in Wales. To demonstrate how this requirement has been addressed for this Scheme, a Pre-Application Consultation Report (PAC Report) (ref: B10237-123532-XX-XX-RP-TA-DH0111) has been prepared and is submitted as part of this application. The PAC Report contains details of how consultation has been carried out in accordance with relevant requirements, sets out the issues raised by respondents during the consultation period, and how the comments have been considered when finalising the application.

A summary of the details contained in the PAC Report are set out at section 5.9 of this document.

1.4.1 Pre-application meetings

A pre-application enquiry was submitted to MTCBC on the 4th February 2020. A subsequent pre-application meeting was held with MTCBC on 27th February 2020, which was attended by MMB.

1.4.1.1 MTCBC Planning

A pre-application meeting was held with MTCBC on 27th February 2020. The purpose of the meeting was to discuss with MTCBC any concerns they had with the proposal from a town planning perspective. MTCBC provided a pre-application response to the proposal on the 6th March 2020. The key planning issues identified by MTCBC are outlined in Table 1.2 below.

Table 1.2: Summary of comments from MTCBC

Theme	Summary of MTCBC Comment
Policy context	Relevant policies contained within the Merthyr Tydfil Replacement Local Development Plan (LDP) include: • Policy SW4 – Settlement boundaries • Policy SW11 – Sustainable Design and Placemaking • Policy CW1 – Historic Environment • Policy EnW1 – Nature Conservation and Ecosystem Resilience • Policy EnW3 – Regionally Important Geological Site, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitat Species • Policy EnW4 – Environmental Protection • Policy EnW5 – Landscape Protection • Policy EcW10 – Sustainably Supplying Materials • Policy EcW13 – Minerals Safeguarding The following Supplementary Planning Guidance (SPG) documents would also be material considerations: • SPG 4 – Sustainable Design, July 2013 • SPG 5 – Nature and Development, May 2015
Principle of the development	The principle of development appears acceptable as it can be demonstrated as part of the planning application that there is both a need for the reservoir and its proposed location can be justified.
Historic and landscape impacts	Due to the Scheme being located within both a landscape of Outstanding Historic Interest in Wales and the Merthyr Common North character area, and being within close proximity to a number of historic assets in the surrounding area, an assessment of the significance of the impact of development on the historic landscape should be submitted in support of the planning application. It is not anticipated that the development would have a significant impact on the surrounding landscape subject to appropriate mitigation measures and the reinstatement of any land that may be disturbed during the construction phase.
Ecological impacts and enhancements	The presence of protected and priority species within 500m of the site was identified. It was advised that a Preliminary Ecological Appraisal (PEA) should be undertaken. The PEA should assess whether the key features that make up the Blaenmorlais Site of Importance for Nature Conservation (SINC) are present within the site to better understand the wider impacts of the development on the SINC designation. The application should demonstrate that the need for the development clearly outweighs the conservation value of the site.
Highway and engineering implications	The Engineering and Traffic Group Leader did not raise any highways safety concerns with the development. Due to the scale of the development under the Flood and Water Management Act 2010 a separate application to the Sustainable Drainage Body (SAB) is required. It is noted that the water from inside the reservoir may be discharged into the nearby drainage system, and as such it is recommended that the requirement for any permits is discussed with Natural Resource Wales.

Theme	Summary of MTCBC Comment
	The site lies within an area identified by The Coal Authority to be at low risk to past coal mining activities. It is not anticipated that there would be any significant mining legacies that may compromise the suitability of the site.

2 Site Description and Planning History

2.1 Site Description

The Site is located at Pengarnddu, an area to the North East of Merthyr Tydfil that predominately consists of industrial land uses. The Site is adjacent to Pengarnddu Industrial Estate to the East and is North of a retail park. The land adjacent to the Sites to its North and West is Common Land. The Brecon Beacons National Park is located to the North.

The Site contains land within the boundary of the PSRV and Common Land. It is located at national grid reference SO 07500 08900. The location of the Site is displayed at the Location Plan (ref: B10237-123532-ZZ-XX-PL-ZA-PN0067) submitted as part of this application.

2.1.1 Designations

The Site is not within the boundary of any statutory designations but is within the boundary of two non-statutory designations.

2.1.1.1 Non-statutory designations

The Site is wholly within the Merthyr Tydfil Landscape of Outstanding Historic Interest. The site is also partially within the Blaenmorlais Site of Importance for Nature Conservation (SINC).

2.2 Surroundings

2.2.1 Historic Environment

The historic interest of Merthyr Tydfil and its surrounding landscape is largely associated with its post-medieval industrial development, with particular interest in landscape relating to the iron and steel industry.

Merthyr Tydfil contains seventy-nine distinct Historic Character Areas (HCA), including Merthyr Common North (HCA041), which the Site is located within. HCA041 is one of the largest HCAs within the landscape, and comprises open common land, used for grazing, with evidence of post-medieval extraction and water management.

The Register of Historic Landscapes in Wales is a non-statutory advisory register that landscapes of Historic Interest can be registered under. The Site is located within the Merthyr Tydfil Landscape of Outstanding Historic Interest, which is one of these landscapes.

2.3 Planning History

Table 2.1 provides a list of all available planning history within the redline boundary of the site. Table 2.2 provides a list of all recent (within the past 5 years) relevant planning history within close proximity to the site. The information contained within both tables was obtained from MTCBC's online database on 26/06/2020.

Table 2.1: Planning history within the redline boundary

Planning reference	Proposal	Site	Application Status
P/19/0017*	Proposed warehouse building with associated infrastructure/engineering	Unit 5, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil, CF48 2TA	Approved – 14/03/2019

Planning reference	Proposal	Site	Application Status
	works to existing hard standing areas and access/parking areas		

*It is noted that although the Site is included within the redline boundary for this planning permission, the site address appears to relate to the industrial estate to the East of the Site.

Table 2.2: Relevant planning history outside the redline boundary

Planning reference	Proposal	Site	Application Status
P/20/0088	Installation of a 6.2MW containerised ground source heat pump system with associated 40 No. 100m deep boreholes	Kepak Group Ltd, Pengarnddu Industrial Estate, Dowlais Top, Merthyr Tydfil	Determination pending
P/18/0309	Construction of 3 storey building accommodating offices, welfare facilities, storage and workshop areas	Unit 5, Pengarnddu Industrial Estate, Dowlais Merthyr Tydfil, CF48 2TA	Approved – 19/11/2018
P/18/0286	Change of use of renewable energy facility with biomass boiler fuelled by virgin wood to renewable energy facility with biomass boiler fuelled by waste wood	Plot 5 & 10, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil, CF48 2TA	Approved – 29/11/2018
P/18/0049	Change of use of storage building to renewable energy facility including the installation of a biomass boiler	Plot 5 & 10, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil, CF48 2TA	Approved – 10/04/2018
P/17/0284	Erection of storage building	Plots 5 And 12, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil, CF48 2TA	Approved – 21/12/2017
P/16/0384	Erection of a single micro wind turbine with a hub height of 15 metres and blade tip height of 20.2 metres, micro siting, and associated infrastructure	Valley Heights Filling Station, Heads of The Valleys Road, Merthyr Tydfil, CF48 2YE	Approved – 10/02/2017
P/16/0324	Retain the existing landfill gas management compound	Biffa Electricity Generation Site Trecatti Landfill Site Fochriw Road Pant-Y-Waun	Approved – 20/10/2016
P/16/0128	Erection of a single wind turbine with a hub height of 50m and a maximum tip height of 77m and associated works	St Merryn Meat Pengarnddu Industrial Estate Dowlais Merthyr Tydfil CF48 2TA	Approved – 08/12/2016
P/16/0054	Erection of storage building and drying unit which accommodates a biomass boiler	Plots 9 & 10, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil, CF48 2TA	Approved – 26/04/2016
P/15/0345	Extension of the current bone trailer loading bays to the rear (east) of the	St Merryn Meat, Pengarnddu Industrial	Approved – 03/12/2015

Planning reference	Proposal	Site	Application Status
	existing factory building complex	Estate, Dowlais, Merthyr Tydfil, CF48 2TA	
P/15/0318	Construction of multipurpose waste treatment centre and remediation pad with associated facilities including a compost processing area, access road and water lagoon	Trecatti Landfill Site, Fochriw Road, Pant-Y-Waun	Approved - 16/11/2015
P/15/0252	Erection of a single 228 kw wind turbine with a blade tip height of 57.7 m and associated hard standing area, substation and transformer	Land Adjoining Unit 3, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil	Approved 15/10/2015
P/15/0241	Erection of a single 500 kw wind turbine with a blade tip height of 77 m and associated hard standing area, substation and transformer	Land Adjoining Unit 3, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil	Approved 15/10/2015

3 Proposed Development

3.1 Need for the Scheme

Following a loss of supply event in February/March 2018, the Drinking Water Inspectorate (DWI) served regulatory notice to WW for the provision of additional 9ML storage at the site. As expansion of the existing SRv is not possible, construction of the Scheme is necessary in order for WW to meet this requirement.

Construction of the Scheme will also enable WW to meet the outstanding requirements of a DWI notice served in 2010 which required the existing SRv to be by-passed, internally inspected and cleaned. A by-pass has been installed and cleaning and review has taken place by a Remotely Operated Vehicle, no manned inspection has been possible due to the criticality of the existing SRv within the supply network. The construction of the Scheme will enable the outstanding internal inspection to take place by providing the additional storage capacity required to allow the existing SRv to be drained for inspection.

3.2 Proposed Scheme

3.2.1 Objectives of the Scheme

The principle project objective of the Scheme is to enable the requirements of the two previously mentioned DWI notices to be fully addressed by WW.

3.2.2 Optioneering

The suitability of several design options was assessed as part of the optioneering process. The proposed Scheme was selected due to the following factors:

- Pengarnddu is a strategically good location in the network to provide additional storage due to the multiple locations it supplies;
- Although the two alternative sites that were considered are located next to existing water mains, they would require significant works to connect to the existing network, whereas PSRv has an existing connection;
- There is insufficient space for upgrade works of the pumping station at the Pontsticill Water Treatment Works (the WTW that supplies Pengarnddu).

3.2.3 The proposed Scheme

The preferred solution at PSRv is to construct a new 2-cell reservoir and associated works for use alongside the existing SRv.

The proposed Scheme will consist of the following components:

- 9ML (operational capacity) 2-cell Reservoir (61m x 50m);
- New overflow pipework;
- One story concrete valve house;
- Footpaths;
- Extension of the site access road; and
- Secure fencing.

Details of the following key components are set out at Table 3.1 below.

Table 3.1: Key component details

Component	Details
9ML 2-cell Reservoir	The new 9ML 2-cell Reservoir will be of concrete construction and will be buried into the landscape. The excavated material will be used to form grass covered embankments that will cover the sides of the reservoir and will be profiled into the existing landscape. The reservoir roof will be covered with a gravel layer to aid in drainage.
New overflow pipework	A new overflow pipe is required as a safety measure in the event the water level inside the Reservoir rises above it's normal Operational Top Water Level.
One storey concrete valve house	The new valve house will be of concrete construction and connected to the new Reservoir. The valve house will provide Operational access to the valves on the inlet and outlet pipework allowing each cell of the Reservoir to be isolated for maintenance and cleaning. The valve house will also include sampling equipment.
Footpaths	New footpaths will be constructed to provide site operatives access to chambers across the site during sampling and maintenance activities.
Site access road	The existing site access road will be extended to allow vehicular access to the new Reservoir for activities including maintenance, inspections and tinkering.
Secure Fencing	The new security fencing will surround the new proposed site boundary. The fencing will be 1.8m tall Weldmesh fencing.

3.3 Construction of the Scheme

3.3.1 Site compounds

One temporary site compound will be required throughout the construction phase of the Scheme. The location of the compound is displayed at section 4.13 of the Contract Management Plan (ref: BIMS 02-08.01DCWW CMP Rev A) submitted as part of this planning application. The compound will house welfare facilities and will provide secure storage for plant and vehicles overnight. Planned access to the site compound is detailed in section 3.4.2 below.

3.3.2 Construction access routes

Access to the construction working area, site compound and welfare facilities will be via the existing road network in the area. The following sections outline the nature of the temporary works and construction strategy and methodology. Section 5.8 of this document contains further information on the management of the construction phase of the Scheme.

3.3.3 Construction strategy and methodology

3.3.3.1 Working hours

Working hours will be limited to 7:30 – 17:30 from Monday to Friday. Works will only be undertaken on Saturdays and Sundays when required and would be limited to 07:30 and 17:30.

3.3.3.2 Site access and construction traffic

All construction traffic will need to access the site by either the A465, and then by the network of unclassified roads through the industrial estate and retail park neighbouring the site. The A460 connects to the A465 and will be used by construction traffic travelling from the south of the site.

The plant and machinery to be used will include the following:

- Commuting vehicles of construction workforce;
- Approx. 4no. Flatbed lorry; and

- Approx. 4no. 20t wagon.
- 2 no. 80t cranes.
- 1 no. 30t excavator.

Details of the deliveries that will be required for the Schemes delivery are set out at Table 3.2 below.

Table 3.2: Details of deliveries

Vehicle	No. deliveries	Construction item	To site / From site
Flatbed lorry	25	Pre-cast wall sections (approximately 100 units)	To site
Flatbed lorry	40	Columns and beams	To site
Flatbed lorry	40	Planks	To site
Flatbed lorry	30	Pipework	To site
Flatbed lorry	15	Security fencing	To site
Wagon	180	Concrete	To site
20t wagon	1000	Earth	From Site

3.3.3.3 Construction phasing

Table 3.3 below provides an indicative timeline of works. Some works will be undertaken in parallel. The total construction period is anticipated to last for approximately 12 months.

Table 3.3: Indicative sequence of construction activities

Construction works activity	Indicative programme and duration	Machinery required
Excavation works	Spring 2021 – Summer 2021	1 no. 30t excavator 4 no. 20t wagons
Reservoir Construction	Summer 2021 – Spring 2022	4 no. flatbed lorries 2 no. 80t cranes
Commissioning of reservoir	Spring 2022	TBC
Construction of roads, footpaths and other associated works	Spring 2022	4 no. flatbed lorries 4 no. 20t wagons

3.3.3.4 Public Rights of Way (PRoW)

The delivery of the Scheme will not disrupt the use of any PRoW, and therefore no permanent or temporary diversion of ProW are required.

4 Planning Policy Context

4.1 Introduction

This chapter provides a summary of the national, regional and local planning policy of relevance to the proposed development. A general assessment as to whether the proposed development is in accordance with the identified planning policies is also included.

4.2 National policy frameworks

4.2.1 Planning Policy Wales (PPW)

PPW and the National Development Framework (NDF) form the national policy framework for the development.

PPW was adopted in December in 2018 and provides the planning policy guidance at a national level. PPW sets out the Governments planning policies for Wales. Its primary objective 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.”

PPW is made up of 5 principles, all of which seek to deliver this objective.

PPW policies which are relevant to this proposal are contained and discussed in Table 4.1 below.

Table 4.1: Relevant PPW policies

Policy	Description	Relevance to proposal
Chapter 2 - People and Places: Achieving Well-being Through Placemaking	PPW Chapter 2 sets out the need for planning policies, proposals and decision to promote sustainable development and support the well being of people and communities across Wales. It also sets out the Key Planning Principles that should be followed to achieve the right development in the right place, including: - Making best use of resources – <i>“The proximity principle must be applied to ensure problems are solved locally rather than passing them on to other places of future generations. This will ensure the use of land and other resources is sustainable in the long term.”</i>; and - Maximising environmental protection and limiting environmental impact – Natural, historic and cultural assets must be protected, promoted, conserved and enhanced.	The delivery of the Scheme will enable WW to address requirements from the Drinking Water Inspectorate (DWI) to both increase the storage capacity of PSRv and to undertake an internal inspection of the existing SRv. WW are seeking to address the DWI's requirements through the delivery of the proposed Scheme to ensure that PRSv can continue to provide the required storage capacity for the area it serves. WW are seeking to address this requirement as soon as possible to avoid a delay in the delivery of the Scheme becoming problematic in the future. The design of the Scheme has sought to protect local natural and historic assets by minimising impacts and delivering appropriate mitigation.
Chapter 3 - Strategic and Spatial Choices	PPW Chapter 3 sets out how good design can be achieved through an inclusive processes and early collective consideration of placemaking issues at the outset. It emphasizes how good design can help to ensure high environmental quality, and how	The impacts of the Scheme upon landscape and visual amenity, ecology, and the historic environment were all considered throughout the design of the Scheme to ensure the proposed Scheme delivers a high-quality design that compliments the characteristics of

Policy	Description	Relevance to proposal
	landscape and green infrastructure considerations are an integral part to the design process. It also sets out how the special characteristics of an area should be central to the design of a development as the layout, form, scale and visual appearance of a proposed development are important planning considerations.	the local area. Negative impacts from the delivery of the Scheme have been minimised as far as practicable and appropriate mitigation has been proposed where necessary.
Chapter 6 - Distinctive and Natural Places	PPW Chapter 6 sets out the strategy for preventing the loss of natural features that contribute to a place's identity. It is stated that: <i>"Desired Distinctive and Natural outcomes will be based on sustaining and creating places in which:</i> <i>The role which landscapes, the historic environment, habitats and biodiversity, the characteristics of coastal, rural, or urban environments play in contributing to Distinctive and Natural places are identified, understood, valued, protected and enhanced."</i> The Chapter sets out Welsh Governments specific objectives for the historic environment, including: - Protecting areas of the register of historic landscapes in Wales. The Chapter recognises that Common Land is a finite resource and should not be developed unnecessarily. The Chapter sets out the role the planning system plays in ensuring that the infrastructure on which communities and businesses depend is adequate to accommodate proposed development. It states the need for effective forward planning between water and sewerage companies and planning authorities, and how planning authorities and infrastructure must work together to achieve the most sustainable outcomes.	An Ecological Impact Assessment (EclA) (ref: B10237-123532-XX-XX-RP-NB-DH108) was undertaken to assess the impact of the Scheme upon local ecology. The EclA concluded that the proposed management of the habitats within the new Welsh Water boundary will enhance the ecological value of the Site by allowing the grassland to flower in places. The grassland will also provide additional habitat for ground nesting birds, reptiles and terrestrial invertebrates. A Landscape and Visual impact Assessment (LVIA) (ref: B10237-123532-ZZ-XX-RP-LA-DH0100) has been undertaken to assess the visual impact of the works upon the local landscape. This assessment concluded that the Scheme responds to its local context and would result in minor alteration to local landscape character and views overall. The Scheme is within the boundary of Merthyr Tydfil Landscape of Outstanding Historic Interest. An Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDHOL2) (ref: B10237-123532-XX-XX-RP-YA-DH0107) has been undertaken to assess the impacts of the Scheme upon the Historic Character Areas (HCA's) that comprise this registered historic landscape. The ASIDHOL2 sets out the mitigation that will be delivered to ensure the delivery of the Scheme supports the conservation of the local historic environment. WW recognises that Common Land is a finite resource, and as set out at section 1.3 of this Planning Statement, a large area of land will be provided to replace the Common Land that will be purchased and developed upon as part of the proposed Scheme. The proposed Scheme seeks to deliver necessary improvements to existing essential infrastructure works on behalf of WW. The delivery of these works will ensure the ongoing provision of adequate water supply for the areas governed by MTCBC that PSRV serves.

4.3 Local Development Framework

4.3.1 Merthyr Tydfil Replacement Local Development Plan (LDP)

The Merthyr Tydfil Replacement Local Development Plan (LDP) 2016-2031 provides the local planning policy framework for the area and was adopted in January 2020. The LDP sets out the key elements of the planning framework for the district. The relevant policies are discussed in table 4.2.

Table 4.2: Relevant LDP Policies

Policy	Description	Relevance to proposal
Policy SW4 – Settlement boundaries	Policy SW4 encourages development within urban areas and supports the re-use of previously developed land. The policy states that development outside of defined settlement boundaries will not be permitted unless it: Is for the provision of public utilities, infrastructure or waste management facilities that cannot reasonably be located elsewhere.	There is not an appropriate site within a settlement boundary at which an alternative scheme that successfully delivers the Scheme objectives can be delivered. As the Scheme is for the provision of essential improvement works to public utilities and cannot be reasonably located elsewhere, its delivery complies with Policy SW4.
Policy SW11 – Sustainable Design and Placemaking	Policy SW11 sets out the need for development to contribute to the creation of attractive and sustainable place through high quality, sustainable and inclusive design. The policy states that where appropriate new development will be required to: 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.	The impacts of the Scheme upon local amenity have been considered throughout its design. Landscape design has been incorporated into the Scheme, and the visual impact of the Scheme has been assessed through a Landscape and Visual Impact Assessment (LVIA) (ref: B10237-123532-ZZ-XX-RP-LA-DH0100). The LVIA concluded that the proposed development responds to its context through careful siting and design to allow the proposals to be well integrated with the site locality. It is considered that the delivery of the Scheme would result in minor alteration to local landscape character and views overall.
Policy CW1 – Historic Environment	Policy CW1 emphasizes the need for historic environment assets to be conserved and enhanced. The policy sets out how development affecting undesignated historic environment assets should have regard to their special character and archaeological importance.	The Scheme is located within the boundary of an undesignated Merthyr Tydfil Landscape of Outstanding Historic Interest, which is comprised of a number of Historic Character Areas (HCAs). An Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDHOL2) (ref: B10237-123532-XX-XX-RP-YA-DH0107) has been undertaken to assess the impacts of the Scheme upon HCA's. The ASIDHOL2 sets out the mitigation that will be delivered to ensure the delivery of the Scheme supports the conservation of the local historic environment.
Policy EnW1 – Nature Conservation and Ecosystem Resilience	Policy EnW1 sets out the requirement for development proposals to promote the resilience of ecosystems, and in particular, maintain and enhance biodiversity interests.	An Ecological Impact Assessment (EclA) (ref: B10237-123532-XX-XX-RP-NB-DH108) was undertaken to assess the impact of the Scheme upon local ecology. The EclA concluded that the proposed management of the habitats within the new Welsh Water boundary will enhance the ecological value of the Site by allowing the grassland to flower. The grassland will also provide additional

Policy	Description	Relevance to proposal
		habitat for ground nesting birds, reptiles and terrestrial invertebrates.
Policy EnW3 – Regionally Important Geological Site, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitat Species	Policy EnW3 states that development proposal likely to have an adverse impact on Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves, or Priority Habitats and Species will only be permitted where it can be demonstrated that: The development maintains and where possible enhances biodiversity and geodiversity interests.	The site is partially within the Blaenmorlais Site of Importance for Nature Conservation (SINC). The impacts of the delivery of the Scheme upon the SINC were assessed as part of the EclA (ref: B10237-123532-XX-XX-RP-NB-DH108) that was undertaken to assess the impact of the Scheme upon local ecology. The EclA concluded that the need for the development outweighs the conservation value of the Blaenmorlais SINC in its current condition, and that the proposed management of new habitats that will be created at the site will enhance its ecological value.
Policy EnW4 – Environmental Protection	Policy EnW4 sets out the need for development proposals to demonstrate that their delivery will not result in an unacceptable impact on people, residential amenity and / or the 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.	The impacts listed at Policy EnW4 are only anticipated to occur during the construction phase of the Scheme. Appropriate mitigation is proposed to reduce the impacts of the construction phase on local amenity. An overview of the proposed mitigation is set out at section 5.8 of this document. The Contract Management Plan (CMP) (ref: BIMS 02-08.01DCWW CMP Rev A) submitted in support of this application provides full details of all mitigation that will be delivered during the construction phase.
Policy EnW5 – Landscape Protection	Policy EnW5 states that development proposals will be permitted where it can be satisfactorily demonstrated that: - It would not cause unacceptable harm to the character and quality of the landscape setting of the County Borough; - There is no satisfactory alternative and the benefits associated with the development can be demonstrated to outweigh the harm.	A Landscape and Visual impact Assessment (LVIA) (ref: B10237-123532-ZZ-XX-RP-LA-DH0100) has been undertaken to assess the visual impact of the works upon the local landscape. This assessment concluded that the Scheme responds to its local context and would result in minor alteration to local landscape character and views overall. As stated previously within this table, the use of an alternative site for the proposed Scheme is not possible.
Policy EcW10 – Sustainably Supplying Materials	Policy EcW10 sets out the importance of safeguarding mineral resources and favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and recycled resources.	Throughout the construction of the proposed Scheme material excavated from site will be reused where possible.
Policy EcW13 – Minerals Safeguarding	Policy EcW13 sets out when new development proposals will be permitted in an area of known mineral resource, which includes: Prior extraction would have an unacceptable impact on environmental or amenity considerations.	The proposed Scheme is located in an area where a safeguarded mineral (sandstone) is present. It is considered that due to the impacts on local amenity that the prior extraction of sandstone would be unacceptable, and therefore the proposed Scheme is considered to accord with Policy EcW13.

4.3.2 Local Plan Saved Policies

Policies from the previous LDP 2006 – 2031 were not superseded by the adopted LDP. No policies were “saved”.

4.4 Other relevant plans, policies and guidance

4.4.1 Supplementary planning Guidance

Supplementary Planning Guidance (SPG) has been prepared by MTCBC in order to provide further information and guidance on specific policy and topic areas. The SPG's refer to policies contained in the previous adopted LDP 2006-2021 which has been superseded by the adopted LDP. However, much of the principles and guidance within the SPG's remains relevant to the determination of planning applications.

The following two SPG's are considered to contain relevant guidance:

- Sustainable Design
- Nature and Development

The relevant guidance from these SPG's is set out at sections 4.4.1.1 and 4.4.1.2 below.

4.4.1.1 Sustainable Design

Chapter 7: Water Conservation and Sustainable Drainage of the Sustainable Design SPG sets out the importance management of water resources and dealing with flood risk.

The delivery of the Scheme supports the SPG's aspiration to achieve long-term sustainable management of water resources. The Scheme does not increase the risk of flooding at the Site or its surrounding areas.

4.4.1.2 Nature and Development

The Nature and Development SPG sets out the importance of biodiversity, survey requirements, and how the impacts of development upon protected species, designated sites and habitats must be assessed and taken into consideration.

The site is partially within the Blaenmorlais Site of Importance for Nature Conservation (SINC). The impacts of the delivery of the Scheme upon the SINC were assessed as part of the EclA (ref: B10237-123532-XX-XX-RP-NB-DH108) that was undertaken to assess the impact of the Scheme upon local ecology.

The EclA concluded that the need for the development outweighs the conservation value of the Blaenmorlais SINC in its current condition, and that the proposed management of new habitats that will be created at the site will enhance its ecological value.

5 Planning Assessment

5.1 Principal of development

PPW is supportive of sustainable development that supports the wellbeing of people and communities across Wales.

The proposed Scheme will provide the improvement works to PSRv required by DWI's. Implementation of the Scheme will ensure that the storage capacity of PSRv is increased to the required level and will enable a necessary internal inspection of the existing SRv.

The measures set out at section 8 of this document will be taken to minimise the impact of the proposal upon the users of surrounding land during the project's construction phase.

The development is supported in principle by both national and local planning policies. Both levels of policy have a presumption in favour of sustainable development, in particular development which contributes to protecting and enhancing natural, built and historic environments and helps to mitigate the impacts of climate change.

5.2 Historic Environment

The site is within the boundary of the following designated areas:

- Merthyr Tydfil Landscape of Outstanding Historic Interest; and
- Merthyr Common North (HCA041).

There are four Grade II listed buildings within 1km of the site, which are as follows:

- White Gate Road Bridge and Aqueduct;
- Aqueduct on Dowlais Free Drainage System;
- Lower Row; and
- The War Memorial, screen walls and surrounding railings.

Due to the presence of these heritage assets an assessment of the significance of the impact of development on the historic landscape (ASIDOHL2) has been undertaken ((ref: B10237-123532-XX-XX-RP-YA-DH0107)). Details of the ASIDOHL2 are set out at section 5.2.1 below.

5.2.1 Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL2)

The Site is wholly within the Merthyr Tydfil Landscape of Outstanding Historic Interest. This registered historic landscape has been assessed by Glamorgan-Gwent Archaeological Trust as containing 79 distinct Historic Character Areas (HCAs).

The ASIDOHL2 has assessed the impacts of the delivery of the Scheme upon the HCA's it affects, as set out at section 5.2.1.2 below.

5.2.1.1 Historic Character Areas (HCAs)

Merthyr Tydfil contains seventy nine distinct Historic Character Areas (HCA), including Merthyr Common North (HCA041), which the Site is located within. HCA041 is one of the largest HCAs within the landscape, and comprises open common land, used for grazing, with evidence of post-medieval extraction and water management.

The impacts of the delivery of the Proposed Scheme upon HCA041 were assessed and were found to be moderate, and that the HCA would lose approximately 0.7% of its area. Full details of this assessment are set out at Chapter 3 of the ASIDOHL2.

The ASIOHL2 identified that the Scheme had additional impacts on Pengarnddu Historic Character Area (HCA035) and Dowlais Top Historic Character Area (HCA047). The ASIOHL2 identified that indirect and non-physical impacts to the south of HCA035 and non-physical impacts to HCA047 are anticipated to occur from the delivery of the Scheme.

The ASIDOHL2 assessment found the overall significance of the impact of the scheme on:

- on HCA035 to be moderate
- on HCA041 to be moderate; and
- on HCA047 to be slight.

5.2.1.2 Proposed Mitigation

The ASIDOHL2 sets out the proposed mitigation to address the impacts of the Scheme upon the affected HCA's, including the following:

- Planting of the embankment with grass will reduce the visual impact of the reservoir, as assessed in the LVIA (Ref: B10237-123532-ZZ-XX-RPLA-DH010) submitted in support of this application;
- The provision of hard surfacing seeks only to extend existing provisions and will be kept to a minimum need for functionality; and
- Reduction of potential indirect visual impact of the Scheme by the planting of vegetation at the Scheme boundary. However, due to the open character of HCA041 this will be approached with sensitivity to ensure sporadic planting, rather than forming a dense or continuous barrier between the scheme and the rest of the HCA.

Archaeological monitoring of topsoil stripping is recommended for the Scheme, this is considered proportionate to the low archaeological potential of the site, importance of the registered historic landscape and the scale of the scheme. No additional mitigation is recommended.

The archaeological and heritage strategy and mitigation proposed by the ASIODHL should be agreed with the local planning authority and Glamorgan-Gwent Archaeological Trust to ensure minimal impact to the historic environment. The scheme will be delivered in accordance with the agreed strategy and mitigation.

5.2.2 Listed Buildings

The ASIDOHL2 assessed the impacts of the delivery of the Scheme upon the four Grade II Listed Buildings within 1km of the site. The delivery of the Scheme is not considered to compromise either these listed buildings or their settings.

5.3 Trees

There are no trees within the site boundary, and therefore the delivery of the Scheme has no arboricultural impacts that require assessment.

5.4 Ecology

An Ecological Impact Assessment (EclA) has been undertaken to evaluate the ecological receptors and assess the impacts of construction and future operation of the proposed Scheme.

The EclA comprised a desk-based study, Extended Phase 1 Habitat Survey and other Phase 2 ecological surveys which were undertaken between May 2019 and May 2020. The findings of the EclA are captured in the EclA Report (ref: B10237-123532-XX-XX-RP-NB-DH108) submitted in support of this planning application.

The EclA concluded that the potential effects include the loss of species-poor acid grassland habitat, the temporary loss of foraging habitat for species such as bats, and the temporary displacement of breeding birds and reptiles from areas within the construction site during construction. These effects have been considered and deemed to possess limited risk to the overall environmental and ecological quality of the area at a county level.

It has been assessed that the availability of other suitable habitat located in the immediate vicinity of the Site and the planned mitigation and enhancement will result in the development having an overall positive effect on the local area. The mobility of the species at risk will also allow them to quickly return and repopulate the Site upon completion of the Site whilst benefiting from the reduced levels of disturbance from horse grazing and vehicles within the new Welsh Water site boundary. Details of the proposed mitigation and enhancement are set out at Chapter 6 of the EclA.

5.4.1 Blaenmorlais Site of Importance for Nature Conservation

The site is partially within the Blaenmorlais Site of Importance for Nature Conservation (SINC). The impacts of the delivery of the Scheme upon the SINC were assessed as part of the EclA, and it was concluded that the need for the development outweighs the conservation value of the Blaenmorlais SINC in its current condition. The proposed management of the habitats within the new Welsh Water boundary will enhance the ecological value of the Site by allowing the grassland to flower. The grassland will also provide additional habitat for ground nesting birds, reptiles and terrestrial invertebrates.

5.5 Landscape

Natural Resource Wales (NRW) provides a national landscape information system in Wales which provides a layered approach to landscape appraisal. This system maps characteristics, qualities and influences on the landscape as a series of aspect layers. The site falls within the following aspect areas:

- MRTHRGL008 Dowlais Top Geological Landscape;
- MRTHRLH007 Acid Grassland Landscape Habitats;
- MRTHRVS313 Merthyr North Flank Visual and Sensory;
- MRTHRHL009 Historic Landscape; and
- MRTHRCL015 Merthyr Common Cultural Landscape.

NRW's classified the overall landscape quality of the area as moderate due to the mosaic of post-industrial and prehistoric features combined with moorland creating a landscape of distinctive character with dramatic characteristics in places.

The site lies within the locally designated Nant Morlais and Cwm Taf Fechan Special Landscape Area and Merthyr Tydfil Landscape of Outstanding Historic Interest. NRW's overall evaluation score for the Visual and Sensory aspect area within which the site lies is moderate.

5.5.1 Landscape and Visual Impact Assessment (LVIA)

An LVIA (ref: B10237-123532-ZZ-XX-RP-LA-DH0100) has been undertaken in support of this application. The LVIA included details of the following:

- Visual baseline
- Landscape character and sensitivity
- Design/mitigation measures
- The impact of the Scheme during both its Construction and Operational Phases.

The LVIA concluded that the proposed development responds to its context through careful siting and design to allow the proposals to be well integrated with the site locality. It is considered that the delivery of the Scheme would result in minor alteration to local landscape character and views overall.

5.6 Contaminated Land

There are no potentially contaminative uses indicated to have been present on the site. It is therefore considered that suitable assessments to test for contaminated land are not required in support of this planning application.

5.7 Water resources, flood risk, and drainage

The site is not located in an area which is at risk of flooding. Therefore, an assessment of flood risk has not been undertaken.

The new reservoir roof will be covered with a gravel layer to aid in drainage. Surface water will be discharged via a sustainable drainage system into the nearby watercourse in the south-east corner of the site.

5.7.1.1 Sustainable Drainage Body (SAB) Consent

Due to the scale of the development the Flood and Water Management Act 2010 requires SAB consent to be secured to ensure the development effectively manages surface water runoff within the site. Consent will be secured through a separate application to SAB.

5.8 Construction phase

5.8.1 Impact on local amenity

The proposed working area is within close proximity to private properties and public areas. Where necessary, the Scheme has been designed to minimise any impacts the construction phase of the project may have upon the areas surrounding the site, although there will be some unavoidable temporary effects on local amenity during this stage.

5.8.2 Noise management

MMB will take all necessary measures to avoid creating a noise nuisance during construction and civil engineering operations.

As a minimum, all plant will be maintained in good working order and will be fitted with its original silencing equipment. The measures that will be delivered to manage noise are set out at section 6.6 of the Contract Management Plan (CMP) (ref: BIMS 02-08.01DCWW CMP Rev B) submitted in support of this application, and include the following:

- Selecting quieter construction equipment;
- Setting time restrictions on certain noisy activities;
- Ensuring equipment is maintained in good working order;
- Equipment will not be left running unnecessarily; and
- Equipment will be fitted with silencers or mufflers where possible.

5.8.2.1 Construction vibration

It is not considered that the impacts of construction vibration would be significant. However, the following vibration mitigation measures are proposed:

- Utilising low vibration working methods where possible;
- Replace plant that is causing significant levels of vibration; and, Isolate vibratory plant using resilient mountings.

5.8.3 Control of lighting

The impacts of lighting during the construction phase will be limited through the following measures:

- During the construction phase temporary lighting will be used only;
- Temporary lighting will be directed into working areas to avoid light pollution;
- Where possible works will be undertaken during daylight hours; and
- Night working will be avoided to prevent the use of lighting at night which can disturb bats and other nocturnal species. Where the use of night lighting cannot be avoided, night lighting will be directed away from properties and sensitive habitats.

5.8.4 Dust and Air Quality Control

The proposed development is expected to be a low risk site in terms of generating dust for a temporary period. MMB will take all necessary measures to avoid creating a dust nuisance. The measures that will be delivered to reduce and mitigate the creation of dust are set out at section 6.7 of the CMP submitted in support of this application.

5.8.5 Pollution control measures

The residual pollution risk of this Scheme is not considered to be significant, and therefore a method statement will not be produced.

5.8.5.1 Environmental incident control equipment

Environmental incident control equipment will be held on site and its stock level will be maintained by a designated person. A list of this equipment and the associated responsible person are set out at section 6.8 of the CMP submitted in support of this application.

5.8.5.2 Concrete run off pollution

Concrete works are anticipated during the construction works. Any surface water (from rain or run off) that will be interacts with wet concrete or concrete slurry will be treated as hazardous waste and dealt with accordingly. No contaminated material will be discharged to the local water course.

5.8.6 Imported materials

Any hazardous materials imported to site will be stored in a designated storage area with a spill control system to Control of Substances Hazardous to Health Regulations (COSHH).

5.8.7 Advertising proposed works

Standard WW signage will be displayed at the Site, and WW will provide local businesses and residents with relevant information.

5.9 Public Consultation

In accordance with Planning (Wales) Act 2015, statutory pre-application consultation has been carried out. The consultation was undertaken digitally due to the restrictions in place due to COVID-19 at the time the consultation was undertaken. The consultation consisted of a webpage at which a draft of the full suite of documents to be submitted in support of the application (other than the Pre-Application Consultation Report (PAC Report)) were available to view.

A number of stakeholders were notified of the consultation by email or letter and were invited to submit responses to the consultation by email. Two responses were received, both of which are available to view at Appendix C of the PAC Report (ref: B10237-123532-XX-XX-RP-TA-DH0111) submitted as part of this application. One response one from the Coal Authority, and the other was from Natural Resource Wales (NRW).

NRW's raised an objection to the proposal due to concern regarding the potential impacts delivery of the Scheme will have upon the local Great Crested Newt (GCN) population and requested further surveys be undertaken. After MMB informed NRW of why they considered further surveys to not be necessary, NRW withdrew their objection, but highlighted that they would welcome an approach that sought to enhance the quality of potential habitats for GCN.

Following the conclusion of the public consultation and the comments received from NRW, MMB have sought to provide post-construction enhancements for amphibians (including great crested newts) by amending the Scheme include the creation of two hibernacula on the southern edge of the Site using concrete, soil and vegetation.

Full details of this consultation process and its finding are set out in the Pre-Application Consultation Report (PAC Report) (ref: B10237-123532-XX-XX-RP-TA-DH0111) submitted as part of this application.

6 Conclusion

To conclude, the proposed Scheme addresses the requirements of both regulatory notices that the DWI has served upon WW. The Scheme will provide an additional 9ML storage at the site and will enable inspection of the existing SRv.

This planning statement demonstrates that the principle of development is acceptable, and in particular:

- The need for the development has been demonstrated and the development is supported by national and local planning policy; and
- The development is in accordance with the policies within the adopted Merthyr Tydfil Replacement Local Development Plan (LDP) 2016-2031.

This planning statement has also demonstrated that the implications of this Scheme upon local ecology, landscape and the historic environment have been considered, and where possible the design of the Scheme has strived to eliminate and minimise impacts. Where this has not been possible, appropriate mitigation has been proposed.

In conclusion, the overall benefits of this Scheme are considered to outweigh the temporary impacts that will occur during construction of the Scheme. The Scheme delivers essential improves to infrastructure that serves Merthyr Tydfil and its surrounding area and will result in an increase to the land designated as Common Land.

