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WALSINGHAM PLANNING

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS

Planning Statement

Merthyr Tydfil Premier Inn

On behalf of Premier Inn Hotels Ltd.

MAY 2024

Walsingham Planning

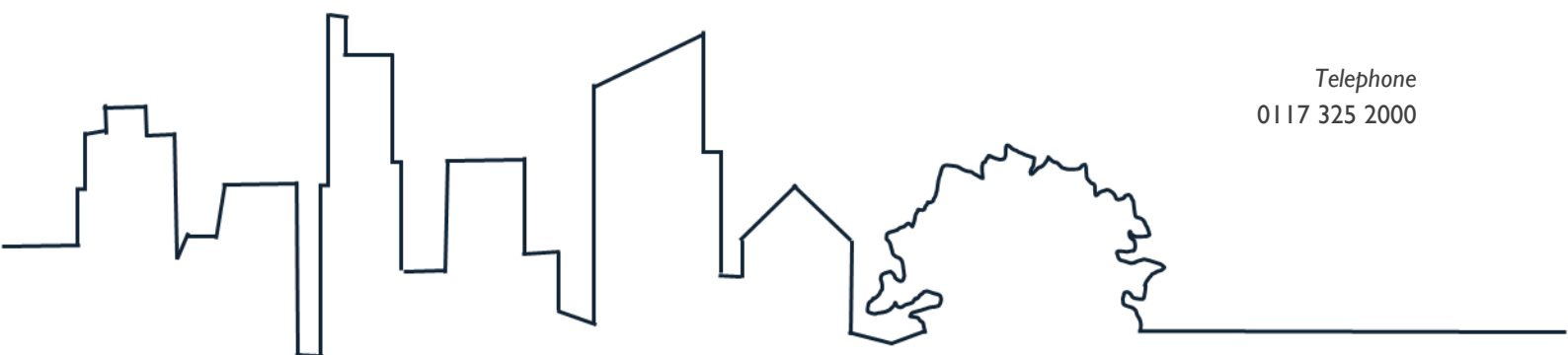
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I INTRODUCTION

I.1 This statement has been prepared by Walsingham Planning to accompany a planning application by Premier Inn Hotels Ltd for a two-storey extension at the Merthyr Tydfil Premier Inn (PI), within the settlement of Merthyr Tydfil adjacent to the A4060. The site is located within the Merthyr Tydfil Borough Council area and the proposal would create an additional 16 ensuite bedrooms with associated landscaping.

I.1 Premier Inn has identified a considerable demand for additional budget hotel accommodation in this location. It is also seeking to add an ancillary breakfast room within the existing hotel to ensure it best fits the needs of customers.

I.2 The applicant therefore seeks consent for the following:

“Extension to existing hotel to provide additional bedrooms, together with alterations to the car park and all associated works”.

I.3 The proposal for additional bedrooms and an adjusted restaurant proposition would meet Premier Inn’s operational requirements at the location and help to address increased bedroom demand.

I.4 In addition to this Planning Statement, the application is supported by the following documents and drawings:

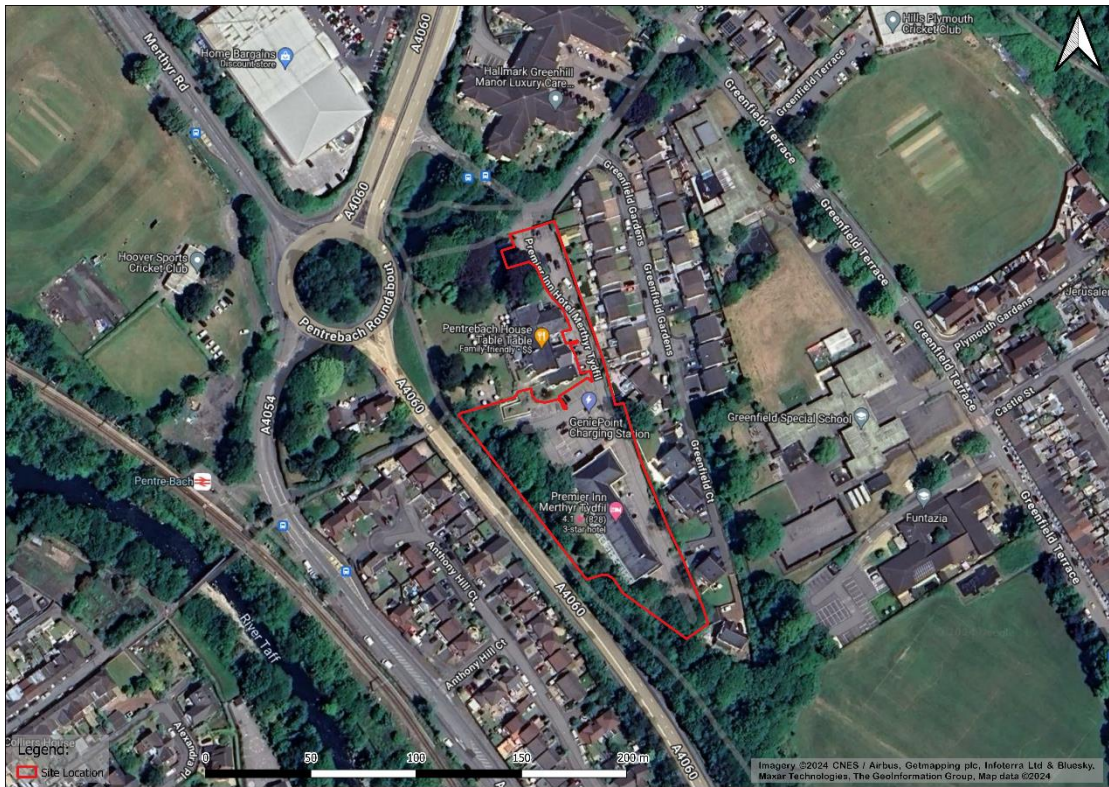
- Cover Letter (Walsingham Planning)
- Planning Statement (Walsingham Planning)
- Heritage Statement (Walsingham Planning)
- Site Location Plan (Walsingham Planning)
- 6153-PL-010 Existing Site Plan (Axiom Architects)
- 6153-PL-100 Existing Floor Plan (Axiom Architects)
- 6153-PL-200 Existing Elevations (Axiom Architects)
- 6153-PL-011 Proposed Site Plan (Axiom Architects)
- 6153-PL-110 Proposed Floor Plan (Axiom Architects)
- 6153-PL-111 Proposed Roof Plan (Axiom Architects)
- 6153-PL-210 A - Proposed Elevations (Axiom Architects)
- Tree Survey (Arbtech)
- Tree Protection Plan (Arbtech)

- Arboricultural Impacts Assessment (Arbtech)
- Arboricultural Method Statement (Arbtech)
- Preliminary Ecological Appraisal (Arbtech)
- Green Infrastructure Statement (Walsingham Planning)
- Flood Consequence Assessment & Drainage Strategy (Simpson TWS)
- Energy Strategy (Thornley & Lumb Partnership Ltd)
- Sustainability Statement (Whitbread Plc)
- CIL Form (Walsingham Planning)

2 SITE CONTEXT

- 2.1 The site relates to the Merthyr Tydfil Premier Inn accessed off Duffryn Rd within the town of Merthyr Tydfil. The existing Premier Inn is a two-storey hotel providing 62 bedrooms. There is an on-site Table Table restaurant alongside 115 on-site parking spaces.
- 2.2 This site is adjacent to the main A4060 Highway which borders the site along the western boundary. The site is split into two areas between north and south. The northern part of the site relates to Pentrebach House (a Grade II listed building) which has been converted into the Table Table restaurant with associated car parking to the east and south of the building. There is a large, grassed area to the west of the building forming the principal grounds to the building which includes several mature trees. The southern part of the site accommodates the Premier Inn hotel with associated car parking to the north and east of the building. To the west and south of the hotel there are several mature trees and a hedgerow along the western boundary.
- 2.3 The site is located within the settlement boundary of Merthyr Tydfil within the Pentrebach area. It is primarily surrounded by residential properties to the east and west as well as a care home to the north. Further north is the Triangle Business Park and further South are Playing Fields.
- 2.4 The site is well serviced by public transport and has a bus stop located to the north of the site (referred to as Pentrebach House Bus Stop). The bus stop is serviced by route 81 which connects to Merthyr Tydfil town centre. A retail and employment park (Triangle Business Park) is located 90m from the site to the north which includes several retail shops (Home Bargains, Halfords) and a number of employment uses. The nearest convenience shop is the Co-op located 130m north of the site. Pentrebach Train Station is located 130m to the south of the site. Frequent trains run connecting to Merthyr Tydfil, Barry Island and Bridgend run by Transport for Wales.
- 2.5 There are a number of mature trees located to the western boundary of the site adjacent to the A4060 and within the grounds of Pentrebach House.
- 2.6 Figure 1 below provides an aerial image of the site and its immediate context.

Figure 1: Site Context Plan (Google Earth Satellite Image)



3 THE PROPOSAL

- 3.1 It is proposed to create additional hotel accommodation for the PI in the form of an extension and include a breakfast room within the existing hotel building. The proposed extension will be located to the south of the site where existing vehicle parking is currently located. The two-storey extension will provide 16 bedrooms and will extend directly from the existing hotel's southern elevation. The proposed breakfast room would provide 38 covers and would be for the use of guests of the hotel. Consequently, it is considered ancillary to the primary CI hotel use. The inclusion of the breakfast room in the existing building will result in the loss of four bedrooms resulting in a total net gain of 13 bedrooms to the hotel through the proposed extension.
- 3.2 The proposed extension will measure approximately 18.4m long x 12.4m wide x 9m high. Figure 2 shows the proposed layout for the scheme.

Figure 2: Proposed Site Layout



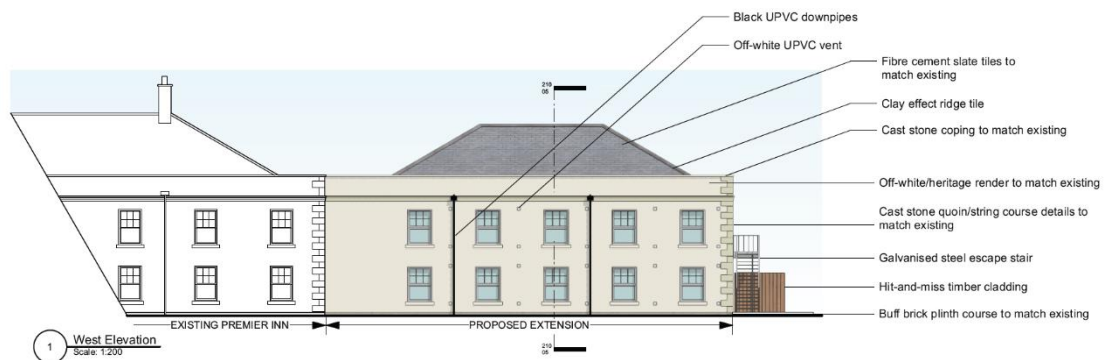
- 3.3 The proposed external finishes to the extension include the following:

- Walls:
 - Render: Off-white/heritage to match existing.
 - Quoins/Feature stone: Precast to match existing.
 - Brick: Buff multi.
- Doors and windows: White UPVC windows.
- Roof:

- Pitched roof: Artificial slate to match existing.
- Flat roof: Grey single ply membrane.
- Rainwater goods - Black UPVC

3.4 The proposed finishes are similar to the existing hotel and complement the existing external finishes found within the site. Figure 3 outlines the proposed elevation facing towards the A4060.

Figure 3: Proposed Western Elevation



3.5 The proposed extension will result in the loss of some open grassed area and 4 existing trees. The proposed landscaping scheme includes a replacement tree strategy on the site providing a minimum of three replacement trees for every tree lost resulting in 12 new trees planted throughout the site.

3.6 Additionally, the existing car park spaces will be reduced from 115 to 92 spaces, reduction of 23 spaces overall. The number of accessible parking spaces will be increased from 12 to 13 as part of the proposal resulting in 79 standard parking spaces and 13 accessible spaces. The reduced number of parking spaces is sufficient to adequately serve the needs of the extended hotel and the existing restaurant.

4 PLANNING HISTORY

- 4.1 The application site is located within Merthyr Tydfil Borough Council. According to the Council's online planning register there are several planning applications which relate to the Site. The relevant planning applications to this proposal are listed in the table below:

Application Ref.	Location	Proposal	Decision
P/96/0506	Pentrebach House Duffryn Road Pentrebach Merthyr Tydfil CF48 4BB	Construction of 40 bed Travel Inn budget hotel with car parking and alterations to access.	Approved 30 April 1997
P/96/0507	Pentrebach House Duffryn Road Pentrebach Merthyr Tydfil CF48 4BB	Construction of 40 bed Travel Inn budget hotel with car parking and alterations to access.	Withdrawn 27 March 1997
P/98/0276	Travel Inn Duffryn Road Pentrebach Merthyr Tydfil CF48 4BB	Retention of flue and box in to form chimney	Approved 30 July 1998
P/99/0476	Brewers Fayre Pentrebach House Duffryn Road Pentrebach Merthyr Tydfil CF48 4BB	External alterations to provide emergency exit.	Approved 7 March 2000
P/14/0216	Premier Inn Hotel Pentrebach House Duffryn Road Pentrebach Merthyr Tydfil CF48 4BB	Proposed two storey extension to hotel to accommodate 22 additional bedrooms with associated works to existing car park and landscaping.	Approved 4 February 2015
P/19/0312	Table Table Pentrebach House Duffryn Road Pentrebach Merthyr Tydfil CF48	Replacement of 75 no. timber framed windows with PVCu windows.	Refused 28 January 2020

- 4.2 The above approved planning consents have been implemented at the site. The operative consent for the existing use on the site is provided by permission granted under P/96/0506. There are no extant conditions which would affect the proposal. Applications are included for

the Table Table Restaurant on the site in Pentrebach House which provides context on how the heritage importance of the listed building has been considered in previous applications and the implications this may have for the proposal. The heritage implications are explored in more detail under Section 7C and the supporting Heritage Statement to this application.

(A) PRE-APPLICATION ADVICE

Merthyr Tydfil Borough Council do offer pre-application advice which is encouraged as it helps to front load discussions. However, no pre-application consultation with the Council was undertaken to inform the proposal. This is due to the scale of the proposed works which are relatively minor, and it is considered the proposal does not involve complicated planning issues which would benefit from initial discussions with the Council.

5 PLANNING POLICY

(A) NATIONAL PLANNING POLICY AND GUIDANCE

Planning Policy Wales (PPW)

- 5.2 Planning Policy Wales (PPW) is the main national planning policy document. Edition 12 of PPW was published in February 2024. PPW sets out the national planning policy approach to ensure the requirements of the Well-being and Future Generations Act (WBFGA) are met through adopting a placemaking approach to plan making, planning policy and decision making. Placemaking is defined in national policy as *“a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well-being in the widest sense.”* (PPW, p.14).
- 5.3 PPW notes at paragraph 5.4.2 that economic land uses are not constrained to traditional employment uses such as offices and industry but include other uses such as tourism. In relation to these economic land uses Welsh Government *“seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim.”*
- 5.4 Paragraph 5.5.7 of PPW outlines where proposals utilise previously developed land for tourism uses *“planning authorities should adopt positive approaches”* to these proposals.
- 5.5 PPW confirms that Planning Authorities in Wales should adopt *“maximum levels of parking for broad classes of development”*. This approach is further emphasised at paragraph 4.1.50 which states *“Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed.”*

Technical Advice Notes (TANs)

- 5.6 **TAN 4 Retail and Commercial Development 2016** - Provides technical guidance on proposals relating to retail and commercial development. Outlines the key considerations which should inform the sequential test approach which includes an assessment of suitability and availability. It notes that Developers should be flexible and innovative about the format, design and scale of proposed development and the amount of car parking needed, tailoring these to fit local circumstances.

- 5.7 **TAN 13 Tourism 1997** – The document supports moderately sized extensions to an existing hotel or public house, including the addition of bedroom accommodation which can help ensure the future viability of such businesses. Using the potential of the site or building may allow local as well as tourism needs to be met. However, there should not be a disproportionate increase in scale.
- 5.8 Regarding car parking and access, these requirements may vary according to the scale and type of activity for which an hotel is intended and its location. In urban areas the amount of parking provided is likely also to be related to public transport facilities. Access and waiting areas should be designed to avoid congestion and minimise turning movements.
- 5.9 **TAN 15 Development and Flood Risk 2004** – This document defines the nature of development in relation to flood risk and outlines the relevant justification tests and criteria that need to be demonstrated where proposals are within flood risk areas. The Development Advice Map (DAM) associated TAN15 is the current framework for assessing flood risk to and from new development. The Welsh Government is due to implement a revised TAN15. This will be supported by the Flood Map for Planning (FMfP), which shows how climate change will affect flood risk extents over the next century.
- 5.10 The Flood Map for Planning has no official status until the Welsh Government implements the revised TAN15. However, it represents the best available information on flood risk and Natural Resources Wales (NRW) will continue to use this to inform their planning advice. Consequently, both the DAM and FMfP have been used to inform the proposal.
- 5.11 **TAN 24 – The Historic Environment 2017** – This document provides guidance on how decision makers should consider the setting of historic assets. The definition of setting for the purposes of planning policy is defined in the guidance as *“the surroundings in which it is understood, experienced, and appreciated embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset.”*
- 5.12 It is for the applicant to provide the local planning authority with sufficient information to allow the assessment of their proposals in respect of historic assets and their settings.

Future Wales: The National Plan 2040

- 5.13 Future Wales is the National Development Plan for Wales guiding development to 2040. The key policies to be considered are:
- 5.14 Policy 1 – Where Wales will grow – This policy identifies the area where Wales will be expected to grow employment and housing opportunities. Merthyr Tydfil is within the Cardiff, Newport and the Valleys national growth area.
- 5.15 Policy 28 – National Growth Area – Cardiff, Newport and the Valleys– this policy provides additional details on the expectations of the identified national growth areas. The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities.

(B) LOCAL PLANNING POLICY AND GUIDANCE

Adopted Local Development Plan

- 5.16 The Merthyr Tydfil Local Development Plan 2016-2031 is the currently adopted plan for the Council area adopted on 29th January 2020. The following policies are considered relevant to the proposals:
- Policy SW4 Settlement Boundaries – the policy seeks to encourage development within urban areas by resisting development outside defined settlement boundaries subject to several criteria. The site is located within Merthyr Tydfil settlement boundary which is identified as a Primary Growth Area.
 - Policy SW11 Sustainable Design and Placemaking – This policy outlines the twelve criteria proposals should demonstrate to contribute to attractive and sustainable places.
 - Policy CW1 Historic Environment – This policy seeks to conserve and enhance historic assets. Proposals need to demonstrate how they will preserve or enhance historic assets.
 - Policy ENW4 Environmental Protection – Proposals are required to demonstrate they will not result in unacceptable impact on public health and safety. Where impacts are identified, the applicant will need to demonstrate the appropriate mitigation measures to provide the lowest possible acceptable level of risk. Regarding flood risk, no highly vulnerable development will be permitted within Development Advice Map (DAM) zone C2.

- Policy ECW7 Tourism, Leisure and Recreation Development – This policy generally supports tourism development within settlement boundaries.

Adopted Supplementary Planning Guidance (SPG)

5.17 The following SPGs are considered relevant to the proposal:

- Planning Obligations 2012
- Sustainable Design 2013

6 OTHER MATERIAL CONSIDERATIONS

Replacement LDP

- 6.1 There is no emerging plan for Merthyr Tydfil. The plan was adopted in 2020 and a full review of the adopted plan will be due in January 2024. The most recent Annual Monitoring Report noted there were 7 policies which were under-performing which indicate the LDP policies are failing to implement the strategy and a formal review is required. The review will commence in January 2024 and should be published within 6 months in accordance with the Welsh Government LDP Manual and Regulation 41 Planning (Wales) Act 2015. The Review Report will confirm the type of emerging plan required either a full review or short form revision.

As there is no significant progress on a new Local Development Plan at the time of the proposal, the adopted Plan remains the relevant planning policy framework to assess the proposal.

7 PLANNING ASSESSMENT

(A) PRINCIPLE OF DEVELOPMENT

- 7.2 The proposal is located within the settlement boundary of Merthyr Tydfil. Local Plan Policy SW4 identifies Merthyr Tydfil as a primary growth area and supports development within identified settlements particularly where they relate to previously developed land. The proposal relates to an existing hotel site and would be considered as previously developed land and lies within the defined settlement boundary of Merthyr Tydfil. Consequently, the principle of development in this location is supported by policy SW4.
- 7.3 This is further emphasised by local plan policy ECW7 which supports tourism development within settlement boundaries.
- 7.4 A hotel is classified as a complimentary retail centre use in PPW (Paragraph 4.3.21 of PPW refers). Complimentary uses would normally require the sequential test to be passed. However, this is a modest extension to an established hotel which fulfils an important roadside function in primarily providing overnight accommodation for business and leisure travellers using the strategic A4060 road network route. The extension would not be proposed or viable on its own. It would not affect hotels within the nearby retail centres within Merthyr Tydfil which provide for a very different part of the market. Therefore, a sequential test is not considered necessary or appropriate in this instance.

(B) DESIGN

- 7.5 The proposal represents a sympathetic design to the original building through the use of a similar form and scale with the main extension sharing the hipped roof profile of the existing hotel with surrounding parapet. A flat roof joins the extension to the existing building which maintains the parapet design. The height of the proposal does not exceed the existing ridge height of the hotel building ensuring the proposal does not detract from the existing hotel. Furthermore, the external design finishes have been chosen to match the existing, where possible, to ensure the proposal is compatible with the existing design of the hotel.
- 7.6 Therefore, the proposed design is considered to be in accordance with the criteria outlined in Policy SW11 – Sustainable Design and Placemaking.

(C) HERITAGE

- 7.7 Pentrebach House which accommodates the Table Table restaurant is a grade II listed building. The listed property was converted from a Council Care Home to an Inn in the 20th Century. Cadw maintain the Listed Building register in Wales, the listing for the property provides the following reason for the designation *“Included as a substantial house in late Georgian style, of interest also as surviving example of the house of an ironmaster of the mid C19.”* The listing notes that the ground floor has been completely altered since the original, however, the exterior of the building still provides heritage value. The listing describes the exterior as a *“Large villa, now inn, painted stucco Italianate classical style, with slate roof and stuccoed end stacks and 2 stacks on front roof slope, the right end stack rebuilt much smaller in C20. Two storeys, seven bays with projecting sections in second and sixth bays. Angle quoins to main range and to the two projecting bays, moulded cornice and parapet. Plate glass sash windows without surrounds, fine stucco pedimented doorcase in right projection with moulded architrave and pediment on console brackets, C20 glazed doors. Seventh bay has added later C19 2-storey canted bay with plate-glass sashes, cornice and parapet carried around. Ground floor centre has large C20 conservatory-style addition across the 3 bays, formerly with sash windows as elsewhere. Various additions to end walls and rear, end walls with first floor and attic window each. The 1876 OS map shows originally one rear projection to centre right, now there is another of equal or larger size to left.”*
- 7.8 Part of the boundary wall to the Pentrebach House is listed as Grade II garden wall to the north and north west area of the site which is included for its group value with the associated grade II listed Pentrebach House.
- 7.9 The existing hotel does not form part of the listing however, it does inform the setting of the listed building. The proposed extension is modest in scale and is located to the southern elevation. The majority of the proposed extension will not be visible when viewed from the Listed building or when viewing the listed building within the wider context due to the dense tree cover to the southern area of the site. The proposal will be in matching materials to the existing hotel building which are sympathetic to the character of the listed building.
- 7.10 The proposal is also supported by a Heritage Statement which assesses the potential impact of the proposal on the significance of the grade II listed building. The Statement concludes that the proposal will result in additional built form within the southern historic curtilage of Pentrebach House and includes the loss of four existing trees to the southern area of the site. However, the changes would be viewed in the context of the existing modern hotel block on the site to which the proposed extension would relate.

- 7.11 The proposed location of the extension to the southern elevation of the existing hotel block ensures the proposal would have limited visibility within the wider area being well screened by the existing building and dense boundary vegetation. The extension would be partly visible on arrival into the Site from the northeast. These views currently present the extant hotel block and do not contribute towards the experience of the heritage values held by Pentrebach House. Regarding the removal of the four trees, these are not considered to form part of the historic planting associated with the original house which are primarily found along the north western boundary of the site.
- 7.12 The design of the proposed extension replicates the materials and form of the existing hotel block which are considered to be of a complementary design to Pentrebach House.
- 7.13 Consequently, the proposal would have no adverse effect on the significance or setting of Pentrebach House.
- 7.14 Additionally, there is a scheduled monuments within the wider landscape which the proposal forms part of their wider setting. Cadw guidance contained within Setting of Historic Assets in Wales (May 2017) notes the distances where planning authorities must consult with Cadw and as a result the application should include information sufficient to assess the heritage implications proportionate to the likely impact. Based on the scale of development a 2km perimeter has been used to identify the potential scheduled monuments which could be affected by the proposal. The schedule monument within the 2km of this site is:
- GM572 – Abercanaid haystack boiler – 515m from site.
- 7.15 In terms of visibility, the proposal lies at a lower point within the landscape than the identified heritage assets and is well screened by existing vegetation on the site. The proposal also forms part urban built form within the area which is of a modern construction. Consequently, the intervening landscape ensures the site is well screened and the modest scale of the extension and its location within an urban built-up area ensures the proposal would not have a detrimental impact on the setting of the identified heritage assets in accordance with PPV and Policy CW1.

(D) TRANSPORT AND PARKING

- 7.16 The proposed extension will be located within an area of the site currently used for parking. The proposal would result in a loss of 23 parking spaces.

- 7.17 The proposed development would result in additional bedrooms being added to the hotel. The site is also shared by an existing restaurant which shares the car park. However, the supporting Transport Statement demonstrates the site will continue to be served by sufficient car parking for both uses on the site including the extended hotel in accordance with PPW.

(E) ECOLOGY & TREES

- 7.18 The proposal relates to a brownfield site which is in active use and is located within a built-up area resulting in the ecological value of the site being considered low. However, the site is surrounded by existing mature and semi-mature trees which do represent a potential habitat. Consequently, the proposal is supported by a Preliminary Ecological Assessment (PEA). The PEA confirms the following habitats are present on the site:

- Buildings (u1b5)
- Hard standing (u1b)
- Modified grass (g4)
- Introduced shrubs (u1 867)
- Scattered trees (u1 32)
- Woodland (w1)

- 7.19 The habitats recorded on the site are common, being prevalent at both the local and national level. Consequently, the ecological value of these habitats is considered low. It is noted that a small area of modified grassland and 4 trees will be lost to facilitate the proposed development.

- 7.20 The loss of 4 trees and modified grassland will be mitigated through the introduction of new tree planting within the site and via a landscaping scheme which includes native tree and shrub species. In accordance with PPW the supporting landscaping scheme provides 12 native replacement trees at a 1:3 replacement ratio.

- 7.21 The PEA also notes the presence of Japanese Knotweed, an invasive non-native species. To ensure the proposal does not result in the spread of this species, the PEA recommends a competent invasive species removal contractor is engaged to remove the Japanese Knotweed recorded within the northeast corner of the site to prevent its unlawful spread resulting from disturbance during development works.

- 7.22 There are no designated sites within or adjoining the site. The nearest designated site relates to Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI) approximately 1.2km from

the site. The SSSI is sufficiently far from the site and has considerable barriers between the two that the proposed development will not impact the designated site.

7.23 In terms of priority species, there was no conclusive evidence that the Site hosts any invertebrates, bats, birds, reptiles, amphibians, badgers, otters, water vole, dormouse or hedgehogs. However, the habitats on site likely provides foraging and commuting opportunities for a variety of species. Consequently, the following enhancements are recommended:

- Amphibian/reptile Hibernacula,
- beetle banks
- dead wood piles
- floral borders
- Bee bricks
- Hedgehog houses,
- Hedgehog fence gaps,
- x2 Bird boxes,
- x2 Bat boxes,
- Log piles / invertebrate hotels,
- Inclusion of native planting species such as fruit bearing trees to improve foraging opportunities.
- Low impact lighting strategy

7.24 It is considered the above enhancements can be secured through appropriately worded conditions.

7.25 Consequently, the proposal appropriately addresses the ecological considerations on the site and provides a substantial contribution to new tree planting within the area supporting wider green infrastructure in accordance with both PPW and Policy ENW1.

(F) FLOODING AND DRAINAGE

7.26 The Site is within Flood Zone B under the DAM data and therefore the site has been recorded to flood in the past. Part of the southern end of the site is within Flood Zone C2 and is at high risk of flooding.

- 7.27 Regarding the Flood Map for Planning the site is within Flood Zone 1 considered to be at low risk of flooding. The majority of the site is at risk from surface water flooding being within both Zone 2 and Zone 3.
- 7.28 The Welsh Government is due to implement a revised TAN15, however, until this has been published the existing TAN15 remains the relevant guidance for proposals and flood risk. TAN15 defines hotels as ‘highly vulnerable development’. TAN15 outlines three justification tests for new development in flood zone C which include:
- i. Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; **or**,*
 - ii. Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region;*
- And**
- iii. It concurs with the aims of PPW and meets the definition of previously developed land (PPW fig 2.1); **and**,*
 - iv. The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in sections 5 and 7 and appendix I [of TAN15] found to be acceptable.*
- 7.29 This is an established hotel which fulfils an important roadside function and where there is demand for additional guest bedrooms contributing to the economy within the Council area. Furthermore, it is not possible to build the extension within an area at lower risk of flooding. The proposal relates to previously developed land as defined by PPW and is supported by a Flood Consequences Assessment (FCA) which demonstrates the proposal and is considered appropriate in relation to the relevant criteria contained within TAN15.
- 7.30 Furthermore, the FCA concludes that following a review of other mapping data available from NRW, including the Flood Map for Planning, and the topographical survey that the proposed extension is actually located in an area that should be classified as Zone B to match the remainder of the site. TAN15 advises that it is suitable for all forms of development to take place within Zone B.
- 7.31 In terms of surface water flooding the proposal is within an area of low risk. However, new development can increase the volume and rate at which surface water runoff is discharged

from a site compared to the existing situation. To mitigate the potential risk of increasing surface water flooding it is proposed to introduce a flow control chamber to the existing surface water drainage system with a new detention basin and below ground attenuation tank provided upstream, which would provide the dual function of draining runoff from the extension as well as storing and attenuating excess runoff associated with extreme storm events. This approach would reduce peak discharge rates from the site to less than 70% of the existing peak system discharge rate.

- 7.32 Consequently, it is considered the proposal passes the justification tests and criteria outlined in TAN 15 and includes measures which demonstrates the flood risk on the site can be overcome in accordance with Local Plan Policy ENW4.

8 CONCLUSION

- 8.1 This Planning Statement alongside the documents and information supporting the proposal demonstrate that the proposed development is in accordance with the relevant policies of the local development plan.
- 8.2 The proposed development will provide additional hotel bedrooms contributing to the economic growth of the area and improving the hotel capacity. The proposed extensions are relatively minor in nature, reflecting the character of the wider area and representing a sustainable form of development.
- 8.3 The extension has been carefully designed to make more efficient use of the existing site and to match the existing hotel in terms of scale and materials to achieve a good quality design while respecting the setting of the Grade II listed Pentrebach House.
- 8.4 The extension would not increase the risk of flooding to the hotel or any other buildings within the area. Appropriate surface water drainage provision has been incorporated into the proposals.
- 8.5 An appropriate amount of car parking would be retained for the hotel and the neighbouring restaurant.
- 8.6 Therefore, the proposal represents sustainable development in accordance with PPW and Local Planning Policies and planning permission should be granted.