

Dear David,

Thank you for your comments regarding the proposed boundary treatment.

As previously outlined, all boundary-related matters were addressed in the Highways Development Control (HDC) email of 04 September, which confirmed **no objections** to the boundary proposals. This position was issued via Liam Davies and passed to your colleague, following a review of the visibility splays and the 1.8 m boundary design incorporated into the scheme.

Regarding the differing annotations between Site Plan A (SB-05) and Site Plan B (SB-06), we are content to remove the boundary-type labels as requested. For the avoidance of doubt, the proposed and agreed boundary treatment is a **1.8 m composite fence**, which remains the most sustainable, low-carbon and policy-compliant option in accordance with **PPW12 S5.3–5.7** on recyclable materials and circular-economy principles.

It is also important to highlight that **PPW12 requires boundary treatments to safeguard privacy, amenity and security**, particularly for **side and rear gardens**.

Under:

- **PPW12 S3.9–3.10 (Placemaking & Good Design)** – development must protect residential amenity and prevent overlooking;
- **PPW12 S4.2.33** – homes must have functional, private outdoor space shielded from intrusion, with boundaries designed to ensure appropriate separation;
- **PPW12 S3.6–3.7** – boundary treatments must secure privacy between dwellings and provide defensible private space.

A 1.8 m fence is the recognised standard throughout Wales for achieving these requirements. Anything lower would not satisfy PPW12's privacy and amenity expectations, especially in the most sensitive areas of the residential curtilage.

In light of:

- Highways' formal "no objection" confirmation,
- the established precedent for 1.8–3 m boundary treatments in the immediate area,
- the sustainability and privacy advantages of composite fencing under PPW12, and
- the policy requirement to secure private, defensible side and rear garden space,

we consider it appropriate and proportionate to **agree the fence line and composite boundary treatment now**, rather than defer it to a planning condition. The evidence is clear, the Highways position is settled, and the proposal fully accords with national and local policy.

Kind Regards,

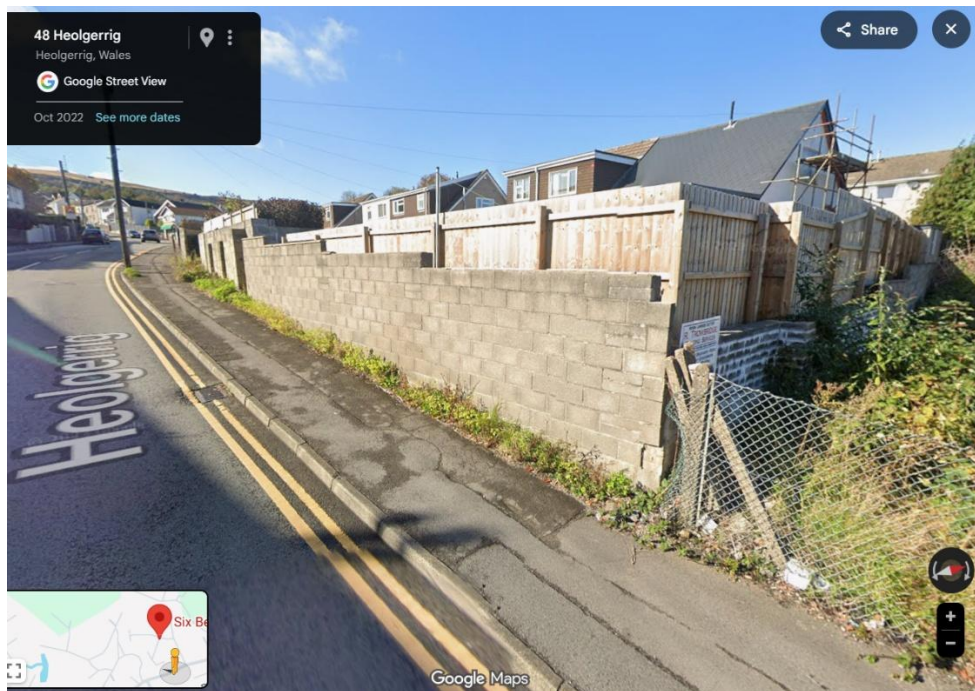
Nick

Extensive Boundary Precedent

The photographic evidence submitted demonstrates overwhelmingly that **tall boundary structures—1.5m to over 3m—form a long-established and dominant characteristic** along Heolgerrig High Street, particularly on the northern side where the application site is located. Examples include:

1. Directly adjoining the application site

- A **2m high block wall** surmounted by a **further c.3m fence**, immediately abutting the application site's rear boundary and presenting directly to the street



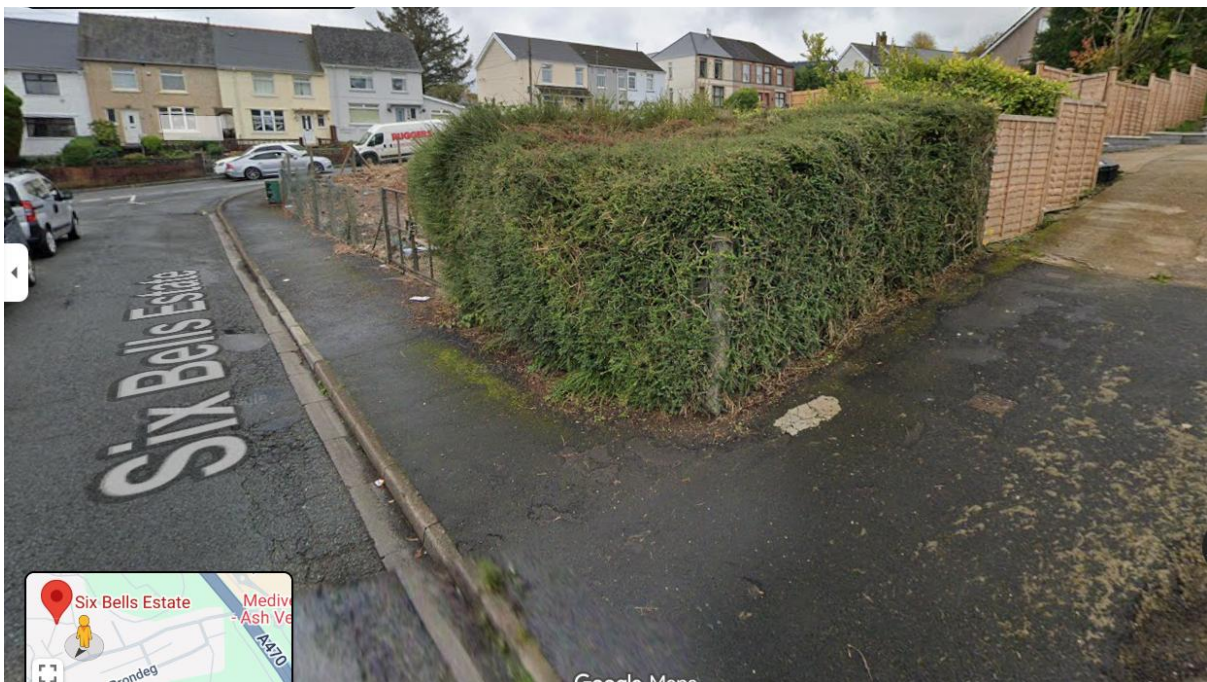
2. Existing fence line along the applicant's boundary

- The current side boundary of the property already incorporates a **1.5m fence** addressing the highway, which continues around the frontage as shown in the submitted photographs



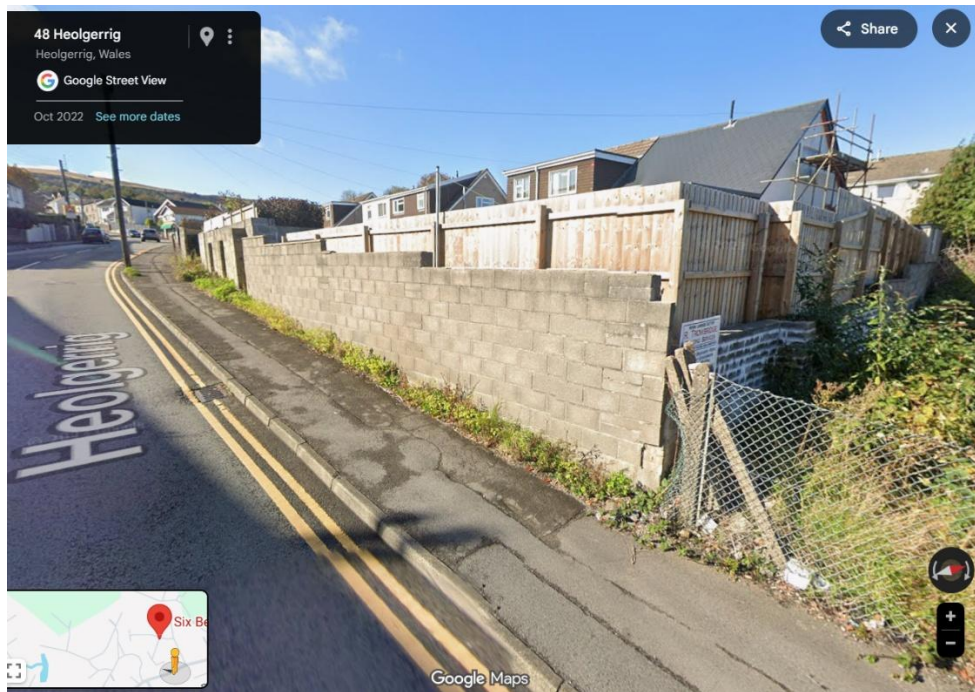
3. Significant natural enclosure already defining the street scene

- A **3m high mature bush** (retained) within the proposals contributes substantial enclosure along the frontage near No. 1 Six Bells, reinforcing the existing vertical boundary form



4. Rear Boundary Context

Directly adjacent to the application site's rear boundary, where the street scene abuts the garden curtilage, there exists a substantial existing boundary structure comprising a 2m high block wall topped by an additional c.3m high fence. This combined arrangement forms a prominent and well-established enclosure directly addressing the highway, demonstrating that tall boundary treatments are already an integral and characteristic feature of the immediate streetscape.



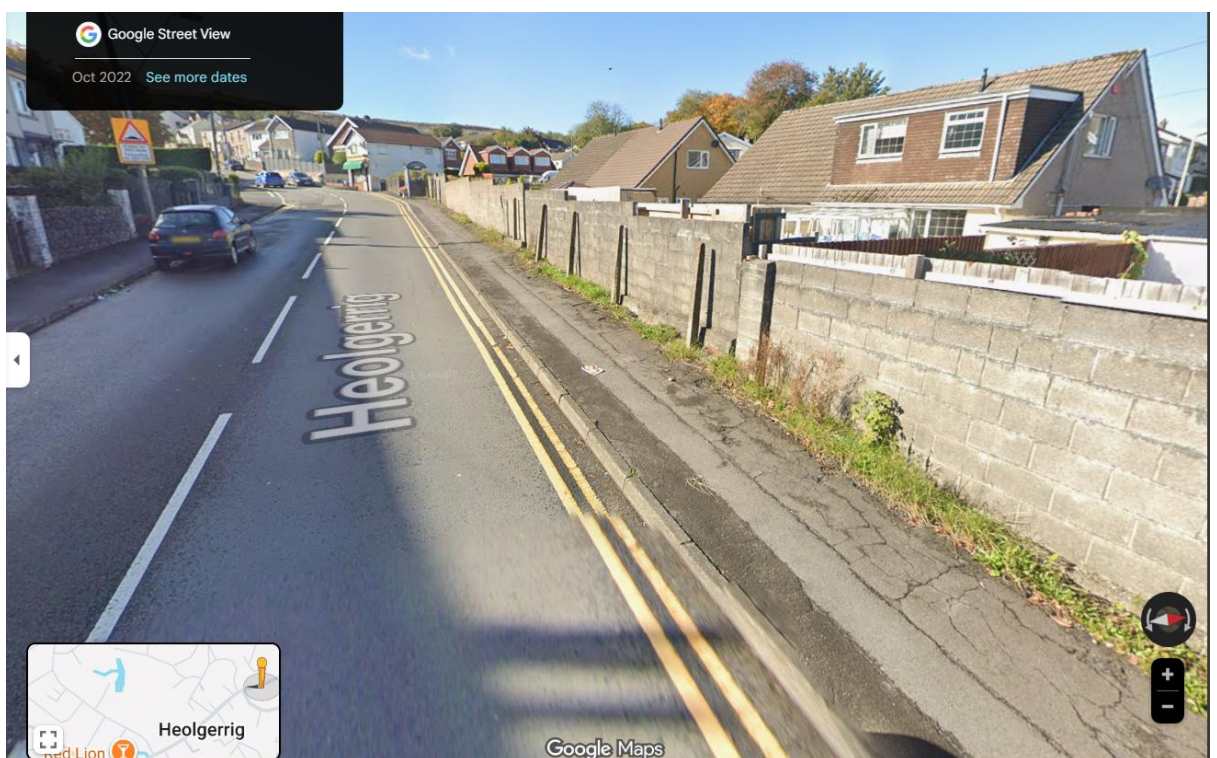
Numerous 1.8m+ walls and fences along Heolgerrig High Street

The evidence includes multiple examples of:

- **1.8m masonry walls and fences** forming street-facing boundaries



- **Standard 1.8m rear-garden treatments** presented to the highway



- Additional **high side-garden boundaries** further along the street, confirming a clear and consistent pattern







5. Composite fencing already part of the street scene

Less than **150m** from the application site, a **composite boundary fence** forms part of the existing street frontage adjacent to the village shop, evidencing local acceptance of composite fencing as a boundary material in this precise context which offers a cleaner smarter street scene.





Collectively, these examples create a **strong, well-documented precedent** for boundary treatments of the height and type we propose.

Retention of Composite Fence – PPW12 Policy Basis

We confirm that our intention is to **retain the composite fence** as the boundary treatment.

This is directly aligned with Planning Policy Wales Edition 12 (PPW12), specifically:

- **S5.3–5.7 – Sustainable Materials, Carbon Reduction & the Circular Economy**

The proposed composite fencing fully accords with PPW12's requirement to prioritise **low-carbon, resource-efficient, and recyclable materials**. Composite systems typically contain a high proportion of recycled content and are themselves fully recyclable at end-of-life, contributing to PPW12's circular economy objectives by reducing waste, minimising raw material extraction, and lowering embodied carbon.

By contrast, **rendered masonry walls** perform poorly under PPW12's sustainability hierarchy:

- **High embodied carbon** due to cement production, quarrying, transport, block manufacture, and on-site construction.
- **Non-recyclable end-of-life waste**, resulting in demolition material that must be disposed of rather than reused.
- **Ongoing maintenance cycles**, including repainting, re-rendering and repointing, which introduce repeated carbon impacts through materials, transport, labour, and chemical finishes.
- **Shorter ecological lifespan**, offering no compatibility with biodiversity enhancements such as hedgehog access or native climbers.

In sustainability terms, the **lifetime carbon footprint of a rendered wall is significantly higher**, and its maintenance profile directly contradicts PPW12's aim to **reduce waste, emissions, chemical treatments, and resource consumption**.

The composite boundary therefore represents a **far more sustainable, regenerative and climate-positive solution**, fully aligned with:

- PPW12's low-carbon design requirements
- PPW12's circular economy and resource-efficiency principles
- The Section 6 Duty of the Environment (Wales) Act 2016
- National biodiversity resilience goals
- **S6.4 – Biodiversity, Ecological Connectivity & S6 Duty:**

The composite fence design enables:

- **Hedgehog access gaps (15 × 15 cm)**
 - Integration of **native climbing species** (honeysuckle, dog rose, ivy)
 - Vertical greening and pollinator habitats
- These enhancements cannot be delivered through rendered masonry walls and contribute directly to the statutory **Section 6 Duty** and Net Benefit for Biodiversity.
- **Local practice already adopts composite fencing**, including within Heolgerrig High Street itself, confirming it is contextually appropriate and policy compliant.

PPW12 – Protection of Residential Amenity

PPW12 S3.9–3.10 – Placemaking & Good Design

Planning must:

- safeguard the **amenity, privacy and security** of existing and future residents
- ensure development does not create **unacceptable overlooking**
- protect **private external space** from intrusion

This directly applies to **side and rear garden privacy**, which are considered **core components of residential amenity**.

PPW12 – Private Outdoor Space is an Essential Requirement

PPW12 S4.2.33 – Maintaining Quality of Place

The planning system must ensure that:

- homes have **functional, private outdoor space**, shielded from intrusion
- boundaries are designed to provide **appropriate separation and privacy**

This paragraph explicitly recognises that gardens form part of the **quality of the living environment**, meaning privacy must be protected through appropriate boundary design and layout.

PPW12 – Boundary Treatments Must Protect Privacy

PPW12 S3.6 & S3.7 – Good Design Outcomes

Good design must ensure:

- **privacy** between dwellings
- **defensible space** for side/rear gardens
- boundary treatments that protect **amenity and security**

This confirms that privacy is a **required design outcome**, not optional.

Why a 1.8m Fence Meets PPW12 Privacy Requirements

Using PPW12, a 1.8m side/rear boundary treatment:

- protects residents from **overlooking**
- provides **defensible private space**
- ensures the garden meets PPW12 expectations for **safe, usable, private amenity**
- maintains residential amenity consistent with **normal boundary treatment heights across Wales**

Walls lower than this height **cannot** meet PPW12's privacy expectations for side and rear gardens.

Given the totality of evidence before the Authority, it is both reasonable and entirely appropriate to confirm the composite fence boundary treatment — and its associated fence line — at this stage, with the requested removal of plan annotations, rather than deferring the matter to a planning condition. This conclusion is supported by the following key factors:

- **Established boundary precedent** throughout Heolgerrig High Street, including numerous 1.8–3 m boundary treatments adjoining the highway and directly comparable side-garden enclosures.
- **Existing 2–3 m structures** immediately adjoining the application site which already define the character and enclosure of this part of the street scene.
- **A clear and recent example of a composite fence within 150 m** of the site, forming part of the established local vernacular.
- **The sustainability and circular-economy advantages of composite fencing under PPW12 S5.3–5.7**, including recyclability, lower embodied carbon, absence of render/paint cycles, and significantly reduced lifetime emissions compared with masonry walls.
- **Highways' formal confirmation of no objections (04 September)**, confirming that the proposed boundary treatment does not give rise to any technical or safety concerns.

In addition to the above, **PPW12 provides explicit policy support for boundary treatments that protect privacy and safeguard residential amenity**, especially for side and rear gardens:

PPW12 – Privacy and Residential Amenity

- **S3.9–3.10** require development to *safeguard amenity, privacy and security*, avoid unacceptable overlooking, and protect private external space.
- **S4.2.33** confirms that homes must have *functional, private outdoor space shielded from intrusion*, with boundary treatments designed to secure appropriate separation and privacy.
- **S3.6–3.7** emphasise that boundary design must provide *privacy between dwellings*, create *defensible private space*, and ensure amenity and security.

A **1.8 m boundary fence**—which is the standard height in residential areas throughout Wales—directly fulfils these PPW12 requirements by:

- preventing overlooking of the most sensitive areas of the garden;
- providing defensible and secure private amenity space;
- maintaining the established pattern of side and rear enclosure in Heolgerrig;
- ensuring the proposal meets PPW12’s expectations for high-quality, private residential external space.

Lower boundary treatments **cannot** meet PPW12’s privacy and amenity tests in this context.

PPW12 – Sustainable Materials

• **S5.3–5.7 – Sustainable Materials, Carbon Reduction & the Circular Economy**

The proposed composite fencing fully accords with PPW12’s requirement to prioritise **low-carbon, resource-efficient, and recyclable materials**. Composite systems typically contain a high proportion of recycled content and are themselves fully recyclable at end-of-life, contributing to PPW12’s circular economy objectives by reducing waste, minimising raw material extraction, and lowering embodied carbon.

By contrast, **rendered masonry walls** perform poorly under PPW12’s sustainability hierarchy:

- **High embodied carbon** due to cement production, quarrying, transport, block manufacture, and on-site construction.

- **Non-recyclable end-of-life waste**, resulting in demolition material that must be disposed of rather than reused.
- **Ongoing maintenance cycles**, including repainting, re-rendering and repointing, which introduce repeated carbon impacts through materials, transport, labour, and chemical finishes.
- **Shorter ecological lifespan**, offering no compatibility with biodiversity enhancements such as hedgehog access or native climbers.

In sustainability terms, the **lifetime carbon footprint of a rendered wall is significantly higher**, and its maintenance profile directly contradicts PPW12's aim to **reduce waste, emissions, chemical treatments, and resource consumption**.

The composite boundary therefore represents a **far more sustainable, regenerative and climate-positive solution**, fully aligned with:

- PPW12's low-carbon design requirements
- PPW12's circular economy and resource-efficiency principles
- The Section 6 Duty of the Environment (Wales) Act 2016
- National biodiversity resilience goals

Final Position Policy-Compliant Sustainable Boundary Solution

The proposed **composite fence** is the most sustainable, lowest-carbon, and most privacy-protective boundary treatment available. It:

- exceeds PPW12's sustainability and circular-economy principles;
- delivers a lower-carbon alternative to rendered masonry, which carries high embodied carbon and repeated maintenance emissions;
- supports biodiversity measures (hedgehog access, native climbers);
- and aligns fully with PPW12's design, amenity, and environmental objectives.

In view of:

- the robust boundary precedent,
- the existing 2–3 m structures adjacent to the site,
- the accepted composite fence within 150 m,
- the sustainability advantages under PPW12,
- the privacy and amenity duties established in PPW12 S.6–3.10 and S4.2.33, and
- the absence of any objection from Highways,

There is no policy basis to defer the boundary treatment to a planning condition.

It is appropriate, proportionate and policy-compliant for the composite fencing and fence line to be agreed now.