

# PLANNING STATEMENT

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**Cefn Isaf Flats  
Pontycapel Road  
Merthyr Tydfil**

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March 2024



## Summary

**Proposal:**

Proposed demolition of existing buildings and redevelopment comprising 40no. residential flats, parking, landscaping, sub-station, bin store, air source heat pump, engineering works, drainage, roof top solar provision and associated works

**Location:**

Cefn Isaf Flats, Pontycapel Road, Cefn Coed Y Cymmer, Merthyr Tydfil, CF48 2RA

**Date:**

March 2024

**Project Reference:**

22.198

**Client:**

Merthyr Valleys Homes

**Product of:**

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## Introduction

- 1.1 This Planning Statement accompanies a full application submitted on behalf of Merthyr Valleys Homes in respect of the proposed demolition of existing buildings and redevelopment comprising 40no. residential flats, parking, landscaping, sub-station, bin store, air source heat pump, engineering works, drainage, roof top solar provision and associated works at Cefn Isaf Flats, Pontycapel Road, Cefn Coed Y Cymmer, Merthyr Tydfil.
- 1.2 Merthyr Valleys Homes has undertaken a condition review of the flats, communal areas, external areas and external fabric of the 2no. residential blocks at Cefn Isaf Flats.
- 1.3 The property is now vacant and consultation with the then existing occupants revealed that the enclosed balconies leak and are prone to extreme temperatures by creating a 'green house' effect. Overall, whilst the premises are considered to be in a reasonable condition, they have little architectural merit and the overall offer is poor. As such, significant upgrade and repairs are required to ensure they are serviceable going forward which will inevitably be required to be replicated in coming years.
- 1.4 Merthyr Valleys Homes have therefore opted for a 'demolish and rebuild' option to provide modern bespoke accommodation for all existing residents (those who want to return to the property) along with a number of additional units in a state-of-the-art contemporary complex which will be compliant with WDQR standards.
- 1.5 The current flats were built in the 1960's and due to structural issues identified it was determined a new scheme would be the most viable long term option. Following consultation with the then existing tenants and leaseholders the decant of the building commenced in 2020 and completed in April 2021.
- 1.6 The planning application comprises the following set of drawings prepared by Coffey Architects.

Drawing Name	Drawing Reference
<i>Architectural</i>	
Site Location Plan-P03	CEF-CoA-00-00-DP-A-(04)001
Existing Site Plan-P03	CEF-CoA-00-00-DP-A-(04)010
Topography-P03	CEF-CoA-00-00-DP-A-(04)011
Existing Building Plans-P03	CEF-CoA-00-00-DP-A-(04)050
Proposed Site Plan-P03	CEF-CoA-00-00-DP-A-(04)110

Proposed Landscape Plan-P03	CEF-CoA-00-00-DP-A-(04)111
Proposed Access Plan-P03	CEF-CoA-00-00-DP-A-(04)112
Proposed Boundary Treatments Plan-P03	CEF-CoA-00-00-DP-A-(04)113
Bin Store-P03	CEF-CoA-00-00-DP-A-(04)114
ASHP Enclosure-P03	CEF-CoA-00-00-DP-A-(04)115
Substation-P03	CEF-CoA-00-00-DP-A-(04)116
Proposed Lower Ground Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)100
Proposed Ground Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)101
Proposed First Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)102
Proposed Second Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)103
Proposed Third Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)104
Proposed Roof Plan-P03	CEF-CoA-00-00-DP-A-(20)105
Proposed Site Sections 01-P03	CEF-CoA-00-00-DP-A-(20)120
Proposed Site Sections 02-P03	CEF-CoA-00-00-DP-A-(20)121
Proposed Street Scenes-P03	CEF-CoA-00-00-DP-A-(20)150
Proposed Lower Ground Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)200
Proposed Ground Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)201
Proposed First Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)202
Proposed Second Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)203
Proposed Third Floor Plan-P03	CEF-CoA-00-00-DP-A-(20)204
Proposed Roof Plan-P03	CEF-CoA-00-00-DP-A-(20)205
Sections 01-P03	CEF-CoA-00-00-DP-A-(20)220
Block A Elevations-P03	CEF-CoA-00-00-DP-A-(20)250
Block B Elevations-P03	CEF-CoA-00-00-DP-A-(20)251
Home Layout Plans 01-P03	CEF-CoA-00-00-DP-A-(20)400
Home Layout Plans 02-P03	CEF-CoA-00-00-DP-A-(20)401
Home Layout Plans 03-P03	CEF-CoA-00-00-DP-A-(20)402
Home Layout Plans 04-P03	CEF-CoA-00-00-DP-A-(20)403
Home Layout Plans 05-P03	CEF-CoA-00-00-DP-A-(20)404
Home Layout Plans 06-P03	CEF-CoA-00-00-DP-A-(20)405
<i>Electrical Services</i>	
ASHP Data Sheet	-
External MEP Services	BR0032-VIDA-XX-XX-DR-ME-001-P
<i>Engineering</i>	
Drainage General Arrangement	1759-SMW-XX-00-DR-D-0001-P2

1.7 In addition, the following supporting documents are submitted.

Document Name	Prepared by
Planning Application Forms	Asbri Planning
Planning Statement	Asbri Planning
Design and Access Statement	Coffey Architects
Bat Survey Report	Just Mammals
Preliminary Ecological Appraisal	Just Mammals
Biodiversity Enhancement Plan	Just Mammals
Flood Risk Assessment and Drainage Strategy Report	Subteno
Ground Investigation	Soiltechnics
Heritage Statement	Holland Heritage
Noise Impact Assessment	Acoustic Consultants
Transport Statement	Acstro
Energy Statement – Part L SAP Calculations	VIDA
Green Infrastructure Statement	TDA

1.8 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:

- **Section 2:** provides a description of the site and its surroundings, including a review of the site’s planning history;
- **Section 3:** provides an overview of pre-application dialogue undertaken in regard to the emerging scheme.
- **Section 4:** summarises the development proposals.
- **Section 5:** outlines the relevant planning policy context, at both the national and local level.
- **Section 6:** addresses the key planning considerations associated with the development proposal.
- **Section 7:** provides a conclusion regarding the overall acceptability of the application.

## Site description

- 2.1 The site relates the Cefn Isaf apartment complex situated along Pontycapel Road, Merthyr Tydfil. The complex is split into two separate blocks connected by a series of concrete walkways. One block fronts onto Pontycapel Road and occupies an elevated position whilst the second block is situated at a lower level along Wern Road.
- 2.2 The upper block is engineered to three storeys and its elevations comprise a mix of grey brick and metal cladding. Whereas the lower block comprises a total of four storeys, however, its southern elevation is staggered at each floor which reflects the sloping topography of the site. The elevations of the lower block also feature grey brick, however, the staggered southern elevation comprise a series of balconies which have been enclosed in glazing and metal framework. Cefn Isaf flats currently comprise a total of 34no. units in a mix of 1, 2 and 3 beds. The building was constructed in the 1960s and is very much 'of its time' and has little architectural merit.
- 2.3 Access to the upper block is achieved via Pontycapel Road to the north. Pedestrian access extends via an under pass through the upper block to the aforementioned elevated concrete walkways which serve the upper storeys of the lower block. Pedestrian access to the lower block can also be achieved to the south of the site along Wern Road where a small parking courtyard is located, suitable to accommodate approximately 12no. vehicles. The existing parking provision represents a ratio of just 0.35 spaces per dwelling.
- 2.4 In terms of immediate surroundings, residential dwellings lie to the north, east and west of the site whilst a portion of undeveloped land lies to the south of Wern Road, beyond which runs the Taf Fawr, a tributary of the River Taff.
- 2.5 A review of Natural Resources Wales' (NRW) Development Advice Map reveals that the site lies within Flood Zone A. As such, is considered to be at little or no risk of fluvial or tidal/coastal flooding. Similarly, NRW's Flood Map for Planning illustrates that it is not subject to flooding from surface water.
- 2.6 A review of Historic Wales' Environment Records reveals that the site lies within close proximity to a number of historical assets. Notably, the Cefn Railway Viaduct which is designated as a Grade II\* Listed Building (CADW Ref: 11377) situated approximately 210m west of the site. The Viaduct occupies a prominent position on the northbound approach of the A470 which connects Merthyr with Cardiff to the south and Brecon to the north. The site is also situated with the Merthyr Tydfil Landscape of Outstanding Historic Interest.

- 2.7 Whilst the Cefn Coed suburb of Merthyr is largely residential in character, it is served by a number of services and facilities along High Street, approximately 180m north of the site including but not limited to: a pharmacy, dental practice, public houses and takeaways. In addition, Ysgol y Graig Community Primary School lies immediately northeast of the site.
- 2.8 In regard to public transport, there is a bus stop located along High Street approximately 180m north of the site which provides users with regular transportation to destinations including: Aberdare and Merthyr Tydfil Bus Station, from which a wide number of services operate.



## Pre-Application Discussions

### **Initial Pre-Application Discussions**

- 3.1 Pre-Application discussions relating to the redevelopment of the site were held with the Local Authority in December 2019 (Ref: PA/19/0061). The proposal at the time comprised demolition of the existing residential blocks to provide new development comprising 33no. 1 bed units and 15no. 2 bed units. A summary of the pre-application response received from the Local Authority is provided below:

#### Principle of Development

- 3.2 The redevelopment of the site could provide a more appropriate level of accommodation and amenity for existing and future occupants. The Council would therefore look positively on a scheme to provide replacement buildings on the site.

#### Design

- 3.3 The existing buildings on the site are poorly designed, detailed and badly built. The spaces around the two buildings are underused, uninviting and generally fail to create a good quality of space. The redevelopment of the site therefore provides a significant opportunity to address these issues.

#### Scale

- 3.4 The scale, mass and height of the buildings will be important, particularly in terms of the impact at street level and from more distant views.
- 3.5 There are no reasons why a more innovative/contemporary design cannot be chosen for this site.

#### Heritage

- 3.6 Given the height of the proposed buildings and their proximity to the Grade II\* Cefn Railway Viaduct and the Cyfarthfa Conservation Area, it is important that the planning application is supported by a LVIA.

#### Highways

- 3.7 There is concern that the proposal may lead to an intensification of traffic along Pontycapel Road. The highways are narrow and constricted and it should be noted that the northern section of Wern Road forms part of a Public Right of Way (PROW).
- 3.8 The Engineering and Traffic Officer also raised concern regarding the increased number of units being proposed for this site and the level of off street parking being provided.

### **Further Pre-Application Discussions**

- 3.9 Following these initial pre-application discussions, a subsequent enquiry was submitted to Merthyr Tydfil County Borough Council in December 2022 (Ref: PA/23/0002). The submission was designed as a scale and massing exercise and featured a number of potential design opportunities. The preferred option comprised two separate blocks consisting of 44no. homes across the two cores.
- 3.10 The siting of the blocks brought the built form into the site to increase the distance of the buildings from neighbours to the east of the site when compared to the existing situation.
- 3.11 A meeting was held with the Local Planning Authority on the 16<sup>th</sup> February 2023. The meeting was positive overall with massing being the main point of discussion. Accordingly, it was agreed that the design would be developed further and a follow up submission was made on in May 2023 with another meeting held on the 29<sup>th</sup> June 2023.
- 3.12 Following this submission, a formal pre-application response was issued by the Local Planning Authority in August 2023 and a summary of the response is provided below:

#### Principle of Development

- Redevelopment of the site is welcomed.
- Given the site's location within the settlement boundary, the proposal would be in accordance with LDP Policy SW4.

#### Character and Appearance

- The proposal could be considered to provide a contemporary and appropriate form of development.
- Separate blocks and their layout, break up the mass of the development and open up the overall site, since the one block has been located further south and both blocks have been set back from the edge of the site.
- This layout combined with the levels of the site would ensure that the height of the overall building would be very similar to that of the existing built development and would reduce the impact of the proposal along Pontycapel Road.
- External finishes should be of high quality materials. Their use in certain sections of the development would break up the bulk of the buildings further and create focal points and features, resulting in a more attractive and innovative proposal.

### Residential Amenity

- Siting of blocks would prevent an adverse impact on Pontycapel Road.
- Wern Road to the east and the west – the building being set back further into the site would also improve the relationship with these dwellings.
- May wish to consider adding privacy screens to external balconies.

### Ecology

- The bat report submitted with the pre-app is acceptable.
- Existing buildings currently provide roosts and roosting opportunities for bats and nesting birds. As such, details regarding the provision for bats and birds will be required at application stage.
- Lighting scheme would be required to demonstrate dark areas and routes to and from the proposed bat provision.
- Ecological Assessment should be submitted at application stage for any onsite landscaping or vegetation.
- Landscape Scheme should be submitted (including details of species to be planted, establishment, maintenance and management for at least 10 years post completion of development).

### Parking and Highways

- Parking provision would be below the required standards of 1 space per flat and the Head of Engineering and Highways has therefore raised concern with the proposal.
- Also raises concerns in respect of the narrow width of the carriageway along sections of Pontycapel Road and Wern Road.
- Highways has requested that the site boundary be set back further (into the site) to provide a minimum carriageway width of 5.5m with a 2m wide footpath on the development side. This would allow 2 way traffic movement and allow for short term visitor parking along the highway.
- In respect of the refuse areas located at the front and rear of the site, regard should be had to the access provision to these areas, in terms of vehicle movements and turning facilities for large refuse trucks.
- The proposed development, subject to the above amendments, could be considered acceptable in respect of parking provision and highway safety and could therefore comply with LDP Policy SW11.

## Proposals

- 4.1 The proposed development comprises the redevelopment of the existing Cefn Isaf flats site to provide 40no. new affordable flats comprised of the following mix:
- 25no. 1 bedroom flat
  - 15no. 2 bedroom flat
- 4.2 The flats will be split between two residential blocks with an open landscaped area running through the centre of the site. The design maximises dual aspect with no single north facing homes.
- 4.3 The main pedestrian access to the central blocks will be achieved through the central landscaped area which lead onto entrance lobbies. Flats at lower ground floor will be accessed through individual front door entrances along the southern elevations of the blocks.
- 4.4 Parking provision will be split between a linear alignment of spaces along Pontycapel Road and a parking area to the south where the existing parking provision is located. Secure and safe cycle storage will also be provided in the westernmost block.
- 4.5 The key aim for the central landscaped area is to provide an enhancement to the public realm and create a safe, secure and comfortable environment. The landscape design strategy has four key elements comprised of a communal landscaped area, private gardens and terraces, boundary spaces and green roofs.
- 4.6 The materiality palette will comprise a contemporary and durable render finish. The earthy colour tone incorporates a varied texture between lower and upper levels as a reference to the surrounding residential context that use a render finish with a datum line where the materiality changes.
- 4.7 A lighter colour stone is proposed to the window sills and lintels to create a relief and reference the nearby stonework of the Grade II\* Listed Viaduct. Glazed tile linings will also be employed to enhance and emphasise entrance areas.

## Planning policy context

### Introduction

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
- Merthyr Tydfil Local Development Plan (2016 – 2031)

5.2 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
- Guidance Note No.1 – Affordable Housing
- Guidance Note No.4 – Sustainable Design
- Guidance Note No.5 – Nature and Development

### National Level

#### **The Well-Being of Future Generations (Wales) Act 2015**

5.3 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires “*public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle*”. The Act sets out seven ‘well-being’ goals as follows:

- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
- A resilient Wales: A nation which maintains and enhances a bio-diverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh

language, and which encourages people to participate in the arts, and sports and recreation.

- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

5.4 Within the Act, sustainable development is defined as follows: *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

### **National Development Framework: Future Wales – The National Plan 2040**

5.5 The National Development Framework: Future Wales – the National Plan 2040 was published on 24<sup>th</sup> February 2021. ‘Future Wales’ sets out the Welsh Government’s strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.

5.6 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Pages 54-56 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years’ time, as follows:

*A Wales where people live:*

- 1. ...and work in connected, inclusive and healthy places*
- 2. ...in vibrant rural places with access to homes, jobs and services*
- 3. ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth*
- 4. ...in places with a thriving Welsh Language*
- 5. ...and work in towns and cities which are a focus and springboard for sustainable growth*
- 6. ...in places where prosperity, innovation and culture are promoted*
- 7. ...in places where travel is sustainable*
- 8. ...in places with world-class digital infrastructure*

9...in places that sustainably manage their natural resources and reduce pollution

10. ...in places with biodiverse, resilient and connected ecosystems

11. ...in places which are decarbonised and climate-resilient

#### Growth Strategy

- 5.7 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

##### *Policy 1 – Where Wales will Grow*

*The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:*

- *Cardiff, Newport and the Valleys*
- *Swansea Bay and Llanelli*
- *Wrexham and Deeside*

- 5.8 It is further explained that *"Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources"* (page 60).

- 5.9 The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows: *"Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being"* (page 60).

#### Placemaking

- 5.10 Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that *"Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration"*.

- 5.11 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

*"The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and*

*integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:*

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*
- *integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment."*

#### *Variety of housing*

*To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.*

#### *Walkable scale*

*To enable active and healthy lives, people should be able to easily walk to local facilities and public transport. Urban growth and regeneration should be focused within inner city areas and around town centres, as well as around mixed use local centres and public transport. Co-working hubs offering an alternative to home-working are an important feature of the economy, and these should be located in town and local centres.*

#### *Density*

*To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. It may be necessary to take social distancing requirements into consideration when designing public and communal spaces.*

#### *Street network*

*To provide a framework for different uses and types of housing to be integrated within neighbourhoods, urban growth and regeneration should be based on a network of streets that enable social distancing if necessary. The street network should be permeable, with streets*



*primarily connecting at both ends with other streets and providing links into, out of, and through places. The street network should have a hierarchy, with streets that have different characters and functions.*

#### Plot-based development

*To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and local builders, urban growth and regeneration should provide opportunities for the development of small plots. A plot-based approach to development should be promoted, including the subdivision of larger sites to be built in small plots or as a group of plots.*

#### Green infrastructure

*To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration. Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated.*

#### Biodiversity and Green Infrastructure

5.12 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires *“an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable” (page 76).*

5.13 In addition to this, the associated importance of green infrastructure is highlighted:

*“As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being” (page 78).*

5.14 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

#### *Policy 9 – Resilient Ecological Networks and Green Infrastructure*

*To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:*

- *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.*

### Transport

- 5.15 Future Wales identifies that transport in Wales is currently dominated by the car and that *“our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people’s everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people’s health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation” (page 85).*
- 5.16 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *“to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel” (page 85).*
- 5.17 Policy 12 relates to Regional Connectivity and states that Planning Authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations,

### **Planning Policy Wales Edition 12**

- 5.18 Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW 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, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.
- 5.19 Sustainable Development is defined at Page 7 of PPW as follows: *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.*

5.20 Paragraph 1.18 sets out that *“Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated”*.

#### Placemaking

5.21 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example states that *“Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities”*.

5.22 It is summarised succinctly at Paragraph 2.3 that *“The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all”*.

5.23 Placemaking is defined at Page 14 of PPW as follows:

*“Placemaking is 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. Placemaking considers the context, function and relationships between a development site and its wider surroundings”*.

5.24 A set of ‘national sustainable placemaking outcomes’ are outlined on page 17 PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:

- *Creating and Sustaining Communities*
  - *Enables the Welsh language to thrive*
  - *Appropriate development densities*
  - *Homes and jobs to meet society’s needs*
  - *A mix of uses*
  - *Offers cultural experiences*
  - *Community based facilities and services*
- *Making Best Use of Resources*
  - *Makes best use of natural resources*
  - *Prevents waste*

- *Prioritises the use of previously developed land and existing buildings*
- *Unlocks potential and regenerates*
- *High quality and built to last*
- *Maximising Environmental Protection and Limiting Environmental Impact*
  - *Resilient biodiversity and ecosystems*
  - *Distinctive and special landscapes*
  - *Integrated green infrastructure*
  - *Appropriate soundscapes*
  - *Reduces environmental risks*
  - *Manages water resources naturally*
  - *Clean air*
  - *Reduces overall pollution*
  - *Resilient to climate change*
  - *Distinctive and special historic environments*
- *Growing Our Economy in a Sustainable Manner*
  - *Fosters economic activity*
  - *Enables easy communication*
  - *Generates its own renewable energy*
  - *Vibrant and dynamic*
  - *Adaptive to change*
  - *Embraces smart and innovative technology*
- *Facilitating Accessible and Healthy Environments*
  - *Accessible and high quality green space*
  - *Accessible by means of active travel and public transport*
  - *Not car dependent*
  - *Minimises the need to travel*
  - *Provides equality of access*
  - *Feels safe and inclusive*
  - *Supports a diverse population*
  - *Good connections*
  - *Convenient access to goods and services*

5.25 It is highlighted at Paragraph 2.20 that *“Not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being”.*

5.26 The implications of COVID are highlighted in Paragraph 2.22, stating for example that *“We must ensure that a post-Covid world has people’s well-being at its heart. Planning Policy Wales leads the way in this respect and contains the principles and policies needed for us to recover from this situation in a positive manner”.*

### Good Design

- 5.27 The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW where it is stated that *“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area”*.
- 5.28 Good design must enable development proposals to address the issues of inclusivity and accessibility for all, and it is highlighted at Paragraph 3.6 that *“This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport”*.
- 5.29 In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals - Paragraph 3.7 states for example that *“Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution”*.
- 5.30 The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8:  
  
*“Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places”*.
- 5.31 Paragraph 3.12 outlines that good design is also about avoiding the creation of car-based developments by minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. It is stated that *“Achieving these objectives requires the selection of sites*

*which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate”.*

#### Sustainable Transport

5.32 PPW advises at Paragraph 4.1.10 that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:

- *“are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling”.*

5.33 Paragraph 4.1.11 summarises that: *“Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services”.*

5.34 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. Paragraph 4.1.13 sets out that *“The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport”.*

#### Active Travel

5.35 The importance of developing local active travel networks to help mitigate the impact of new development by providing an alternative mode of travel to the private car is highlighted in PPW. It is stated at Paragraph 4.1.30 that *“Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice”.*

#### Public Transport

- 5.36 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this *“by locating development where there is, or can be, good access by public transport”*.

#### Affordable Housing

- 5.37 Paragraph 4.2.26 states that *“A community’s need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications”*.

#### Green Infrastructure

- 5.38 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.11 that *“The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places”*.

#### Sustainable Drainage Systems (SuDS)

- 5.39 The importance of considering SuDs as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *“The provision of SuDS must be considered as an integral part of the design of new development and considered at the earliest possible stage when formulating proposals for new development”*. It is advised at Paragraph 6.6.19 that *“Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified”*.

#### **Technical Advice Notes**

- 5.40 The following Technical Advice Notes (TANS) are of relevance to the proposed development:
- 5.41 TAN 2 Planning and Affordable Housing (2006): outlines the general concept of affordable housing as being: *“the ability of households or potential households to purchase or rent property that satisfies the needs of the household without subsidy”*. The guidance requires local planning authorities to: *“include an affordable housing target in the development plan which is based on the housing need identified in the local housing market assessment, indicate how the target will be achieved using identified policy approaches and monitor the provision of affordable housing against the target and where necessary take action to ensure that the target is met”*.

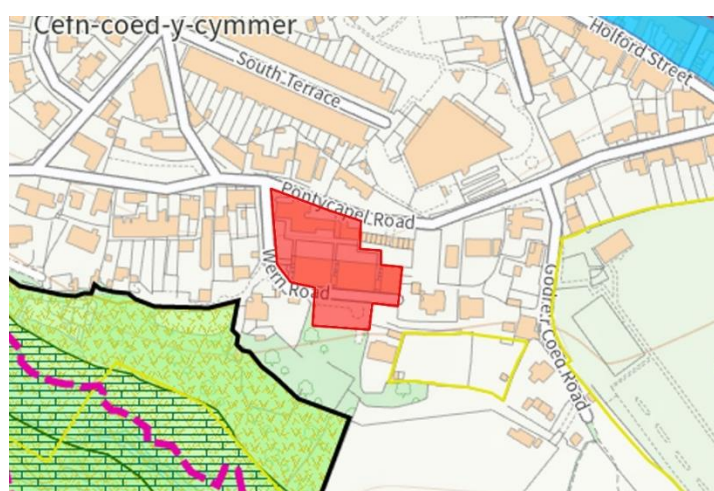
- 5.42 TAN 5 Nature Conservation and Planning (2009): provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.
- 5.43 TAN 11 Noise (1997): provides advice on how the planning system can be used to minimise impact of noise without placing unreasonable restrictions on development. It outlines some of the main considerations which local planning authorities should take into account in drawing up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.
- 5.44 TAN 12 Design (2016): provides advice on design considerations and states that development should aim to:
- *Create places with the needs of people in mind, which are distinctive and respect local character*
  - *Promote layouts and design features which encourage community safety and accessibility*
  - *Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles*
  - *Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building*
  - *Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards*
  - *Secures the most efficient use of land including appropriate densities*
  - *Consider and balance potential conflicts between these criteria*
- 5.45 TAN 18 Transport (2007) confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.
- 5.46 TAN 24 Historic Environment (2017) states that development in Conservation Areas should put an emphasis on controlled and positive management of change that encourages economic vibrancy and social and cultural vitality, and accords with the area's special architectural and historic qualities.



**Local Level**

- 5.47 The Merthyr Tydfil Local Development Plan was adopted in January 2020 and comprises part of the prevailing development plan for the area.
- 5.48 As shown on the proposals map extract below, the site lies within the settlement boundary for Merthyr Tydfil, as such, is located in an area where development is normally permitted on unallocated white land, therefore is not subject to any specific allocations or constraints.

*Merthyr Tydfil CBC LDP Proposals Map Extract*



- 5.49 The following LDP policies are considered relevant in the context of the proposed development:

Policy Reference	Relating to
<i>Improving Social Well-Being</i>	
SW1	Provision of New Homes
SW2	Provision of Affordable Housing
SW3	Sustainably Distributing New Homes
SW4	Settlement Boundaries
SW11	Sustainable Design and Placemaking
SW12	Improving the Transport Network
<i>Improving our Cultural Well-being</i>	
CW1	Historic Environment
<i>Improving our Environmental Well-being</i>	
EnW1	Nature Conservation and Ecosystem Resilience
EnW4	Environmental Protection

**Supplementary Planning Guidance**

5.50 The following Supplementary Planning Guidance (SPG) adopted by Merthyr Tydfil County Borough Council is of relevance to the proposed development:

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

## Appraisal

### Overview

- 6.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.
- 6.2 The key planning considerations that would arise from the proposed development are as follows:
- The **principle of development** in terms of land use planning policy and sustainable development;
  - The **impact of the development on the character and appearance** of the building and on the surrounding area;
  - The **impact of the development on residential amenity**;
  - The **impact of the development on biodiversity**;
  - The **impact of the development on the historic environment**; and
  - The **impact of the development on the local highway network**.

### Principle of Development

- 6.3 The scheme comprises the redevelopment of the site, as such, will make use of previously developed land. The development is therefore considered to be in accordance with paragraph 3.55 of PPW which establishes an emphasis on using previously developed land for housing development which can relieve the pressure on greenfield sites.
- 6.4 The site is situated within the settlement boundary of Merthyr Tydfil, as such, is situated in an area where development is normally permitted, on unallocated white land, therefore is not subject to any specific allocations or constraints.
- 6.5 Policy SW2 (Provision of Affordable Housing) notes that, during the Local Development Plan period, 253no. affordable dwellings are anticipated to be provided. Merthyr Valleys Homes are a registered social landlord, as such, all dwellings are to be affordable. It is acknowledged that the site currently features 34no. units, notwithstanding, the development comprises an additional 6no. affordable homes which will contribute to the target of 253no. dwellings identified in Policy SW2.

- 6.6 Policy SW3 (Sustainably Distributing New Homes) denotes the Local Development Plan's strategy for locating new development, stating that the majority of development will be concentrated towards the main Merthyr Tydfil settlement, which is classified as the Primary Growth Area in Policy SW4 (Settlement Boundaries).
- 6.7 The principle of redeveloping Cefn Isaf flats to accommodate 40no. affordable units is therefore firmly established in accordance with paragraph 3.55 of PPW and Policies SW2, SW3 and SW4 of the Merthyr Tydfil County Borough Council Local Development Plan.
- 6.8 It should also be emphasised that the Local Planning Authority consider the principle of development to be acceptable as detailed within the formal responses to pre-application enquiries PA/19/0061 and PA/23/0002.

**Impact of the Development on the Character and Appearance of the Area**

- 6.9 As aforementioned, the existing Cefn Isaf Flats buildings are deteriorating and therefore detract from the visual amenity of the area. Policy SW11 (Sustainable Design and Placemaking) establishes 12 separate criteria that new development should comply with in order to create attractive and sustainable places through high quality, sustainable and inclusive design. Each of which will be discussed in turn below.
- 1. Be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density*
- 6.10 In this regard, the proposed development will comprise a betterment when compared to the existing building as the built form will be brought inwards into the site and increase the distance from surrounding residential dwellings. Consequently, it is considered that the scheme will not result in an overbearing impact on surrounding properties.
- 6.11 The height of the development will be commensurate with the existing buildings and the use of two separate blocks with a landscaped area in between will increase the 'openness' of the site.
- 6.12 In light of the above, the proposed development is considered to be in accordance with criterion 1 of Policy SW11.

2. Integrate effectively with adjacent spaces, the public realm and historic environment to enhance the general street scene and create good quality townscape

- 6.13 The existing buildings are poorly designed, detailed and badly built and therefore detract from the character and appearance of the area. The provision of two high quality and contemporary blocks will therefore make a positive contribution to the street scene in accordance with criterion 2.

3. 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

- 6.14 As aforementioned, the siting of the two cores will bring the built form into the site compared to the existing buildings and will therefore result in a betterment in respect of outlook of dwellings along Pontycapel Road to the north, Wern Road to the west and neighbouring properties to the east. The proposed development will therefore not result in an acceptable impact on local amenity and is consequently compliant with criterion 3.

4. Contribute to the provision of green infrastructure, including open space in accordance with the Council's standards, sustainable drainage systems where appropriate, and ensure that the County Borough's network of green infrastructure is accessible and connected

- 6.15 In respect of green infrastructure, the application is accompanied by a Green Infrastructure Statement prepared by TDA which identifies that the site currently has limited GI assets. As such, GI/habitat losses will be adequately compensated with new tree, scrub and wildflower habitat. Furthermore, the proposal will result in biodiversity net gain across the site. The proposal is therefore considered to be in accordance with criterion 4 of Policy SW11.

5. Allow access for the widest range of people possible, and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards

- 6.16 The proposed development comprises 1 and 2 bedroom affordable properties whilst also featuring wheelchair accessible provision which will ensure that the scheme is accessible to a wide range of persons with varying needs.
- 6.17 In respect of traffic movements, the proposal results in the increase of just 6no. flats from 34no. to 40no. As such, it is considered that the increase in vehicular trips as a result of the proposed development is negligible.

- 6.18 The proposed development features highway improvements through the widening of Pontycapel Road which is currently substandard to a 5.5m carriageway. This will better accommodate two-way traffic flow along the site's frontage.
- 6.19 In respect of parking, A total of 30 car parking spaces will be provided; 9 accessed from Pontycapel Road and 21 from Wern Road. The 30 car parking spaces includes 5 accessible spaces for bluebadge holders. The parking provision equates to 0.75 spaces per flat, a significantly higher parking provision than the current 0.35 spaces per flat.
- 6.20 The scheme is therefore accessible to a range of persons with varying needs and will result in a betterment in respect of highway safety and parking in accordance with criterion 5.

6. Incorporate a range of inclusive/adaptable design specifications, a mix of house types, tenures and sizes to meet identified local needs.

- 6.21 As identified above, the proposal comprises affordable dwellings to be managed by Merthyr Valleys Homes as the Registered Social Landlord. It will therefore contribute to addressing a local housing need for 1 and 2 bedroom properties. The scheme is consequently compliant with criterion 6 of Policy SW11.

7. Incorporate resource efficient/adaptable buildings and layouts using sustainable design and construction techniques

- 6.22 The application is accompanied by a Design and Access Statement prepared by Coffey Architects which identifies that Modern Methods of Construction (MMC) will be adopted in the form of the structure envelope being lightweight and constructed off-site where possible.
- 6.23 The accompanying Energy Statement – Part L SAP Calculations prepared by VIDA demonstrates that the proposal will achieve an energy rating of EPC A through the provision of an air source heat pump for space heating, water source heat pumps and hot water cylinders for domestic hot water, mechanical ventilation with heat recovery and PV system for electricity generation.
- 6.24 The proposed development therefore incorporates resource efficient buildings using sustainable design and construction techniques in accordance with criterion 7.

8. Minimise the demand for energy and utilise renewable energy resources

- 6.25 As identified above, the development will utilise an air source heat pump and PV arrays. Therefore, it will utilise renewable energy resources and is compliant with criterion 8.

9. Provide and protect relevant utility services and infrastructure without causing any unacceptable environmental impacts

- 6.26 The proposed development includes sub station provision along Pontycapel Road to serve the dwellings. The sub station will be sited on previously developed land and will therefore not result in any unacceptable environmental impacts in accordance with criterion 9.

10. Incorporate measures to improve ground and surface water quality wherever possible

- 6.27 The scheme will be subject to Sustainable Drainage Approval and therefore incorporates SuDS in the form of a green roof, rain gardens and permeable paving as illustrated on the accompanying Drainage General Arrangement plan. The scheme is consequently compliant with criterion 10.

11. Provide adequate facilities and space for waste collections and recycling

- 6.28 The accompanying site layout illustrates that each block will be served by its own refuse store and therefore adequate facilities and space is provided for waste collections and recycling in accordance with criterion 11.

12. Promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour

- 6.29 Given that the proposal comprises affordable housing, it is required to comply with Secure by Design standards. In this regard, the development will result in the demolition of the existing building complex which is subject to anti-social behaviour issue and will increase natural surveillance of the surrounding area through the creation of active frontages along Pontycapel Road and Wern Road.
- 6.30 The proposed development will therefore reduce the opportunity for crime and anti-social behaviour and is in accordance with the twelfth and final criterion contained in Policy SW11 (Sustainable Design and Placemaking).
- 6.31 In light of the above, the impact of the development on the character and appearance of the area is considered to be acceptable.

**Impact of the Development on Residential Amenity**

- 6.32 The accompanying Design and Access Statement prepared by Coffey Architects includes a massing overlay compared with existing buildings which illustrates that whilst the height of Block B will be higher than existing, the massing of the new built form will be brought inward from Pontycapel Road and from neighbouring properties to the east. This will result in a betterment in respect of the

outlook of existing dwellings. Furthermore, the proposal will introduce a new landscaped route between the blocks which will contribute to the site's openness and reduce the overall built footprint. The proposed development is therefore considered to be acceptable in respect of the impact on residential amenity.

### **Impact of the development on biodiversity**

- 6.33 Externally, it is considered that there is minimal potential for the site to be occupied by high level of biodiversity as it has largely been developed. Notwithstanding, it is acknowledged that internally, there is potential for bats to be using the buildings which are required to be demolished in order to accommodate the proposed development. As such, this application is accompanied by a Bat Survey Report prepared by Just Mammals. The surveys established that the site is being used as a summer day roost by a low number of pipistrelle bats. A European Protected Species licence is therefore required from Natural Resources Wales before any work is done which affects roosts and obstructs the bat exit/entry points.
- 6.34 In addition, a robust scheme of mitigation is required to ensure that the favourable conservation status of the bat species is not adversely affected. The provision of the EPS licence and scheme of mitigation will ensure that there is no unacceptable impact on the protected species in accordance with Policy EnW1 (Nature Conservation and Ecosystem Resilience) of the adopted LDP.
- 6.35 The application is also accompanied by a Biodiversity Enhancement Plan which illustrates how the proposal will comply with the Environment (Wales) Act 2016 in respect of biodiversity enhancement through the provision of measures including bat boxes, bird boxes, swift bricks, bee bricks, a green roof and landscaping.
- ### **Impact of the development on the historic environment;**
- 6.36 A review of Historic Wales' Environment Records reveals that the site lies within close proximity to a number of historical assets. Notably, the Cefn Railway Viaduct which is designated as a Grade II\* Listed Building (CADW Ref: 11377) situated approximately 210m west of the site. The Viaduct occupies a prominent position on the northbound approach of the A470 which connects Merthyr with Cardiff to the south and Brecon to the north. The site is also situated within the Merthyr Tydfil Landscape of Outstanding Historic Interest.
- 6.37 The application is accompanied by a Heritage Statement prepared by Holland Heritage. The Statement demonstrates that the proposed scheme would have no direct impact on the appearance or significance of designated historic assets or non-designated structures. In terms of archaeology, it is considered that the previous



development of the site has already compromised any buried assets. The proposed development will therefore ensure that the integrity of historic environment assets will be conserved in accordance with Policy CW1 (The Historic Environment) of the adopted LDP.

**Impact of the development on the local highway network**

- 6.38 As identified in paragraphs 6.16 – 6.20 of this Statement, the proposed development will result in a betterment of highway safety through the widening of Pontycapel Road and parking provision when compared to the existing fall back provision. The impact of the development on the local highway network is therefore acceptable in accordance with criterion 5 of Policy SW11 (Sustainable Design and Placemaking) of the adopted LDP.

## Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Merthyr Valleys Homes in relation to the proposed full planning application for the demolition of existing buildings and redevelopment comprising 40no. residential flats, parking, landscaping, sub-station, bin store, air source heat pump, engineering works, drainage, roof top solar provision and associated works at Cefn Isaf Flats, Pontycapel Road, Cefn Coed Y Cymmer, Merthyr Tydfil.
- 7.2 The site is situated within the settlement boundary on 'whiteland' and is not subject to any specific allocations or constraints. It is therefore in an area where development is normally permitted. The proposed development will make an efficient use of previously developed land to provide affordable housing that complies with modern housing standards. In light of the above, the principle of development is firmly established in accordance with paragraph 3.55 of PPW and Policies SW2 (Provision of Affordable Housing), SW3 (Sustainable Distributing New Homes) and SW4 (Settlement Boundaries) of the Merthyr Tydfil County Borough Council Local Development Plan.
- 7.3 It should also be emphasised that the Local Planning Authority consider the principle of development to be acceptable as detailed within the formal responses to pre-application enquiries PA/19/0061 and PA/23/0002.
- 7.4 The existing buildings are poorly designed, detailed and badly built. The development of a high quality, contemporary scheme which is also has no unacceptable impact on surrounding historic assets will therefore result in a significant betterment on the character and appearance of the surrounding area. Furthermore, the massing of the built form will be brought into the site to result in a betterment on the residential amenity of the surrounding residential dwellings. The development is therefore considered to be in accordance with Policies SW11 (Sustainable Design and Placemaking) and CW1 (Historic Environment)
- 7.5 Based on the material considerations outlined within this statement and the accompanying drawings and documents, it is concluded that the proposal represents an acceptable and sustainable form of development which is appropriate for the location.
- 7.6 The proposals therefore comply with relevant national and development plan policies and supplementary planning guidance. It is for these reasons that it is respectfully requested that Merthyr Tydfil County Borough Council grant planning permission for the scheme.