



## Planning, Design and Access Statement

Land off B4275, Aberaman, Aberdare, Rhondda  
Cynon Taf, CF44 6LJ

March 2018

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## Appendices

Appendix I 1 – Council’s Pre-application Response (dated 01/11/17)

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For and on behalf of GVA Grimley Limited



- 1.2 This statement has been prepared in line with the requirements and recommendations of Technical Advice Note 12: Design (TAN 12), RCTCBC's own guidance on Design and Access Statements (DAS) and having regard to the 'Design and Access Statements in Wales Why, What and How' (June 2017) guidance, which builds on that understanding and responds to legislative requirements for DAS under the Planning (Wales) Act 2015.
- 1.3 This statement seeks to demonstrate the acceptability of the proposed development in the context of relevant planning policy, and to describe and justify the proposed design and access arrangements. The remainder of the statement is therefore structured as follows:
- Section 2 provides a summary of the proposed development and sets out the brief and vision for the site;
  - Section 3 provides an analysis of the site and its context;
  - Section 4 provides a review of the planning policy context relevant to the proposal;
  - Section 5 interprets context and policy analysis into a set of guiding principles for the development of the site before going on to describe the proposed development in greater detail, giving specific details regarding the evolution of the scheme, and design and access considerations (as required by TAN 12);
  - Section 6 considers the primary planning issues in further detail, providing a comprehensive analysis of how this proposal conforms with relevant policy and planning considerations, and
  - Section 7 provides an overview and concludes the statement.

## 2. The Proposed Development

2.1 The proposed development, as described on the planning application form is as follows:

*“Residential development including landscaping, drainage, access improvements and other associated infrastructure.”*

2.2 The proposals are submitted in outline form with all matters reserved. An indicative layout plan has been submitted, which demonstrates that approximately 38 units could be delivered onsite, comprising a mix of 1, 2 and 3 bedroom units. The indicative proposals show 14 x 1-bedroom walk up flats, 12 x 2-bedroom houses and 12 x 3-bedroom houses.

2.3 The indicative layout utilises the site’s existing access in the north and includes a spine road with properties along its western side and cul-de-sacs with further properties off its eastern side. The flood modelling work undertaken and agreed with Natural Resources Wales (NRW) demonstrates that the access and the proposed dwellings are not at risk of flooding, even in the most extreme scenario.

2.4 The landowner has an obligation to retain access to the two dwellings situated to the west of the site (granted planning permission under application references 05/1319/10 and 08/1921/10, respectively). While the access point itself will be improved to serve the proposed development, the track serving the two dwellings to the west will be retained.

2.5 There are currently gas mains which cross the northern part of the site. The indicative layout assumes that these will be diverted as part of the site’s development; if this cannot be achieved, this part of the site cannot be developed for residential purposes.

### Brief and Vision

2.6 The application site is subject to a lapsed outline planning permission for office/industrial/warehousing (reference 06/2448/13). The site is no longer required as part of the expansion of the landowner’s business and, given its sustainable location within the settlement of Aberaman, represents an excellent opportunity for the delivery of much-needed housing in the region.

2.7 Given the applicant is not a property developer, the brief for the site is to secure a flexible and usable outline planning permission that will mean the site is attractive to a range of property developers, house builders and housing associations.

2.8 The applicant and the project team established the following vision for the site:

- A well-designed solution to allow the delivery of much needed housing that makes efficient and effective use of land;

- Appropriate levels of car parking and amenity space for future residents;
- A solution which does not over-bear on the closest neighbouring properties and retains access to them, and
- A suitably-designed interaction with the adjacent highway, allowing set back from the side elevations of the dwellings and the necessary easement over the highway drain.

## 3. Site and Context Analysis

### Location and Description

- 3.1 The site is currently unoccupied greenfield land. It extends to approximately 1.3 hectares and is fairly level, other than the drainage ditch which extends down its western flank.
- 3.2 The site is located in Aberaman, approximately 3km south-east of Aberdare town centre. It is situated between a recently expanded residential area to the west and an established business/employment area to the east. Further business/employment uses lie north of the site, while open land and Aberdare Town Football Club lie further south.

### Context

- 3.3 Outline planning permission was previously granted on the site for office/industrial/warehouses uses in 2007; however this was never implemented and has now lapsed. In planning terms, the site is considered to have a nil use.
- 3.4 The site falls within the settlement boundary, as defined by the proposals map accompanying the Rhondda Cynon Taf Local Development Plan (LDP) 2006-2021 (adopted March 2011). The site is not allocated for any specific land use, although it does form part of the Cynon Valley River Park designation. There are no internationally designated nature conservation sites within 2km, nor are there any heritage designations on or immediately adjacent to the site.
- 3.5 Approximately 40% of the site is located within Flood Risk Zone C2 according to NRW's Development Advice Maps, while approximately 60% is located within Flood Risk Zone A. GVA have prepared a Flood Consequences Assessment (FCA) following discussions with NRW, who have reviewed the FCA and provided feedback through their discretionary planning advice service and agree with the modelling undertaken, and therefore that the site is suitable for residential development from a technical perspective as it does not flood in the extreme event (with allowance for climate change).

### Planning History

- 3.6 The Council hold a record of one application at the site itself:
- 06/2448/13 – Outline application for office, industrial and warehouse building (Use Classes B1 and B8) with a gross floorspace of 500 sq.m with associated car parking (approved 10th January 2007).

3.7 The above permission was never implemented. The Council also hold records of several applications for residential development on nearby and adjacent sites (all wholly within Flood Zone C2).

3.8 The following applications relate to the neighbouring land to the west of the site:

- 05/1319/10 – Detached dwelling (Re-submission) on land rear of 6 Farm Road (approved 13th January 2006).
- 08/1921/10 – Detached dwelling on Plot 2, Land rear of 6 Farm Road (approved 3rd August 2009).

3.9 Davies Developments Ltd are currently developing the land adjacent to Farm Road (Heol Ty Aberaman):

Phase 1:

- 03/1327 – Outline planning permission for residential development (approved 16th November 2005). As varied by planning permission references: 09/0284/15 and 11/0199/15 (as varied by planning permission reference: 13/1335/15).
- 12/1263/16 – Reserved matters approval (35 units) approved 2nd April 2014. Reserved matters approval 08/1742/16 (50 unit scheme) not implemented.

Phase 2:

- 08/1911/13 – Outline planning permission for residential development (approved 20th February 2012). As varied by planning permission reference: 15/1066/15.
- 15/1228/16 – Reserved matters approval (30 units) approved 26th June 2017.

## Pre-application Enquiry

3.10 A pre-application enquiry was submitted to Rhondda Cynon Taf County Borough Council (RCTCBC) on 04 October 2017. A meeting was then held between RCTCBC and GVA on 27 October 2017, and a written response was provided by the Council on 01 November 2017. The Council's pre-application response is included at Appendix 1.

3.11 The key outcomes of the pre-application enquiry were as follows:

- The site lies in a relatively sustainable location;
- The proposal could potentially bring forward new residential development as a windfall site and make a small but valuable contribution towards improving the Borough's housing land supply;

- Aside from the site's partial location within Flood Zone C2, the principle of residential development is acceptable;
- The B4275 and estate road to the north represent strong boundaries between the residential and industrial areas;
- The site would be best served by an improvement to the existing access, albeit an emergency access would also be required due to the location of the existing access in an area at risk of flooding;
- An easement needs to be provided for the highway drain running along the verge at the edge of the site.

3.12 The pre-application response also indicated that a tree survey would be required to accompany the planning application. However, this is not deemed necessary given that there are no trees on the application site and peripheral trees will be unaffected by the works.

3.13 Similarly, the pre-application response also requests that a site survey identifying existing ground levels, plus details of proposed levels including sections / cross sections, be submitted. A topographical survey has been included with the application, but proposed levels (including cross sections) are not provided at this stage as the site is relatively flat (development will not affect the existing drainage ditch along the site's western flank) and the proposals are only in outline form.

## Technical Matters

3.14 The following technical considerations have been assessed as part of the site's analysis:

- Flood risk and drainage;
- Ground investigation;
- Ecology;
- Transport.

## 4. Planning Policy Context

### Preface

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 4.2 The planning policy that supports the proposal exists at a number of levels and extends to a range of guiding documents.
- 4.3 To highlight the site's potential, the following sections record the main provisions of the principal statutory planning documents and strategies of relevance. It establishes the context within which the proposed development will need to be brought forward.
- 4.4 National guidance comprises Planning Policy Wales Edition 9 (PPW) (November 2016), as well as a range of supplementary Technical Advice Notes (TANs). At the local level, the development plan comprises the Rhondda Cynon Taf LDP, which covers the period 2006-2021. The site is located within the settlement boundary of Aberaman, which is identified as a Small Settlement within the Northern Strategy Area of the County Borough (although the site itself is just 250m from the settlement boundary of Aberdare, which is identified as a Principal Town in the LDP).

### National Level

#### Planning Policy Wales

- 4.5 PPW (Edition 9) sets out the land use planning policies of the Welsh Government (WG). This contains guidance for the preparation of Local Authority's development plans, development management, and sets out the WG commitment to creating sustainable developments.
- 4.6 Chapter 4 of PPW has been updated to include reference to the statutory purpose for the planning system introduced by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015, particularly regarding the use of the well-being goals in the Act in the absence of locally set well-being objectives.
- 4.7 Chapter 4 acknowledges that the land use planning system is central for achieving sustainable development in Wales. It recognises the importance of creating sustainable communities where people can live, work and play and encourages opportunities for land to occupy both commercial and residential uses to derive benefit from co-location. This chapter identifies a number of key objectives for policies and proposal to achieve. These include:

- The location of development in places which minimise the demand for travel, especially by private car;
- ensuring that all local communities – both urban and rural – have sufficient good quality housing for their needs, in safe neighbourhoods;
- promoting access to employment, shopping, education, health, community, leisure and sports facilities and open and green space, maximising opportunities for community development and social welfare;
- fostering improvements to transport facilities and services which maintain or improve accessibility to services and facilities, secure employment, economic and environmental objectives, and improve safety and amenity;
- fostering social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone;
- protecting and improving the natural environment, and the historic environment and cultural heritage resource; and
- contributing to the protection and, where possible, the improvement of people's health and well-being as a core component of sustainable development.

4.8 Chapter 7 of PPW relates to economic development and states that local planning authorities are required to ensure that the economic benefits associated with a proposed development are understood and that these are given equal consideration with social and environmental issues in the decision-making process, and it should recognise that there will be occasions when the economic benefits will outweigh social and environmental considerations.

4.9 Chapter 8 of PPW acknowledges that the land use planning system can help to achieve the WG's objective for sustainable transport and, amongst other matters, sets out a hierarchy that supports development primarily accessible by walking and cycling, followed by public transport and then the private car.

4.10 Chapter 9 of PPW deals with housing and emphasises the need to provide housing of a good quality that will contribute to the development of sustainable communities. It stipulates that the local authorities must make provision for a 5-year supply of land for housing. The site proposed for development falls entirely within the settlement limits of Aberaman and provides an excellent opportunity to deliver housing in an area that would greatly benefit from such a development.

4.11 Chapter 13 of PPW includes national policy in relation to development management and flood risk. Paragraph 13.4.1 provides instances where development proposals defined as being in areas of high flood hazard can be considered. Chapter 13 also places emphasis on the important role

of Natural Resources Wales (NRW) in providing advice in relation to planning applications. Paragraph 13.4.2 specifically states that Planning Authorities must have good reasons for not following the advice of NRW. While more detail is provided in the submitted Flood Consequences Assessment (FCA), in this instance, NRW have confirmed that the flood modelling exercise undertaken is accurate and the area of the site proposed for development is not at risk of flooding.

### Technical Advice Notes (TANs)

4.12 As set out above, PPW is supplemented by a series of Technical Advice Notes (TANs). A range of these apply to the proposed development, and their specific provisions are addressed through the information submitted in support of this planning application. Relevant TANs include:

- **Technical Advice Note 2 (Planning & Affordable Housing)** was published in 2006 and requires local planning authorities to include an affordable housing target in the development plan; indicate how the target will be achieved using identified policy approaches, and monitor the provision of affordable housing against the target.
- **Technical Advice Note 12 (Design)** was updated in 2016 and provides detailed advice on how good design in development may be facilitated by the planning system. The guidance states that good design has the potential to assist in environmental sustainability, economic growth and social inclusion. The guidance places particular emphasis on the achievement of sustainable design solutions, sustaining or enhancing character, promoting innovative design solutions, ensuring access for all and promoting legible development.
- **TAN 15: Development and Flood Risk (2004)** advises on development and flood risk together with its impact on sustainability principles. It also provides a framework to assess fluvial and tidal flooding, and run-off from development. The overriding aim of the guidance seeks to locate new developments away from areas identified at high risk of flooding. TAN 15 sets out the tests that highly vulnerable development is required to satisfy in order to be considered acceptable in areas at risk of flooding.
- **Technical Advice Note 18 (Transport)** was published in 2007 and recognises the key role of the planning system to facilitate sustainable travel patterns. As in TAN 12, the guidance aims to influence the location of new development to reduce the need to travel and subsequently promote more sustainable forms of transport which contribute to environmental improvement in the longer term.
- **Technical Advice Note 20 (Planning and the Welsh Language)** was published in October 2013. This provides guidance on how the planning system considers implications of the Welsh language. A TAN 20 Practice Guidance Note was published in June 2014 which should be read in conjunction with TAN 20, but has been produced to assist local planning authorities in the preparation, monitoring and review of their Local Development Plans.

- **Technical Advice Note 23 (Economic Development)**, was published in February 2014 and focuses on the need to encourage development in order to generate wealth, jobs and income. This TAN recognises the importance of all aspects of development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.

## Local Level

4.13 The following planning policies of the LDP and relevant Supplementary Planning Guidance (SPG) are considered to be applicable to the proposals:

- Objective 1 – To provide for the County Borough’s overall housing requirement through a mix of dwelling types catering for all needs to promote integrated and thriving communities.
- Objective 2 – To promote integrated communities by ensuring the development of a high quality built environment that provides opportunities for living, working and socialising for all.
- Objective 5 – To provide an environment in Rhondda Cynon Taf that encourages a healthy and safe lifestyle and promotes well-being through improvement in access to green space in the north, provision of open space in the south, and the protection of recreational space throughout the County Borough.
- Objective 8 – To manage the effects of climate change by protecting biodiversity and focussing development away from areas vulnerable to flooding.
- Objective 10 – To promote the efficient and appropriate use of land, soil and minerals throughout the County Borough by maximising the use of land, promoting the re-use and restoration of derelict land and buildings, reuse of materials and the safeguarding of resources of local, regional and national importance where they occur in Rhondda Cynon Taf.
- CS1 (Development in the North) – relates to development in the north and promotes high quality affordable accommodation that promotes diversity in the residential market amongst other things.
- CS4 (Housing Requirements) – sets out a requirement for land for the construction of 14,385 new dwellings to be made available during the plan period.
- CS5 (Affordable Housing) – seeks the provision of affordable housing on suitable sites to contribute to established community housing need.

- AW1 (Supply of New Housing) – sets out the housing land requirement for the County Borough and encourages the development of unallocated land within defined settlement boundaries and the provision of affordable housing.
- AW2 (Sustainable Locations) – supports development proposals in sustainable locations and in accordance with the criteria outlined by this policy.
- AW4 (Community Infrastructure and Planning Obligations) – details 17 areas where contributions can be sought.
- AW5 (New Development) – sets out criteria against which new development will be assessed, particularly in respect of amenity and accessibility.
- AW6 (Design and Placemaking) – states that ‘Placemaking’ is a key element of achieving sustainable development through the creation of well-designed places, which are able to stand the test of time.
- AW8 (Protection and Enhancement of the Natural Environment) – the policy seeks to preserve the County Borough’s natural heritage.
- AW10 (Environmental Protection and Public Health) – does not permit development proposals where they would cause unacceptable harm to people’s health and / or local amenity.
- NSA10 (Housing Density) – states that proposals for residential development will be permitted where the net residential density is a minimum of 30 dwellings per hectare. Lower density levels may be permitted in accordance with the criteria defined.
- NSA11 (Affordable Housing) – states that the provision of 10% affordable housing will be sought on sites of 10 units or more.
- NSA12 (Development within and adjacent to Settlement Boundaries) – states that development will be permitted within the defined settlement boundaries subject to the criteria outlined within this policy.
- NSA26 (Cynon Valley River Park) – supports development which contributes to the value of the Cynon Valley River Park strategy. This is in relation to important wildlife sites, species and features of nature conservation value and water quality, as well as promoting public access on foot and bicycle, adapting to climate change, encouraging health and well-being and supporting heritage and tourism.

4.14 The Development Plan also comprises a range of Supplementary Planning Guidance (SPG), which provide detailed guidance on the way in which policies of the LDP will be applied in

particular circumstances or areas. The following SPG documents are considered to be relevant to the proposals:

- Design and Placemaking (March 2011)
- Affordable Housing (March 2011)
- Access Circulation and Parking (March 2011)
- Nature Conservation (March 2011)
- Employment Skills (June 2015)

4.15 The Community Infrastructure Levy (CIL) Charging Schedule was adopted by the Council on 31st December 2014. The proposed site falls within residential charging zone 1, in which there is a nil charge.

4.16 The Rhondda Cynon Taf Joint Housing Land Availability Study (JHLAS) 2017 (published 30th June 2017) confirms that the County Borough has a 1.3 year supply of land for housing. This falls well below the 5 year requirement stipulated by Welsh Government Technical Advice Note (TAN) 1: Joint Housing Land Availability Studies (2015).

## 5. Design and Access Proposals

### Preface

- 5.1 This section of the statement takes forward the key findings of the appraisal of context, which are firstly interpreted into a set of guiding principles, before the evolution of the scheme’s design is described.
- 5.2 This section then goes on to draw upon the advice and design objectives contained within TAN 12 and consider how the context to the site has informed the evolution of the proposed development. These matters are addressed under the following key topics:
- Character (including considerations of placemaking, amount and density, streets, spaces and public realm, uses and tenure, scale, layout, heritage and detail design);
  - Access;
  - Movement;
  - Environmental Sustainability, and
  - Community Safety.

### Interpretation of Context

- 5.3 The development proposals have been informed by the site’s context, which comprises its physical and socio-economic context, as well as the planning policy context, relevant planning constraints, the outcome of the pre-application enquiry and the statutory pre-application consultation exercise.
- 5.4 While the proposals are submitted in outline form with all matters reserved, and therefore the detailed proposals are not yet finalised, the context analysis has informed some important aspects of the scheme’s design. The key findings of the context analysis are as follows, which have been translated into subsequent guiding principles that have informed the design of the scheme.

Context Analysis Findings	Guiding Principles
While approximately 40% of the site lies within flood zone C2, the FCA demonstrates that only the western fringe of the site is actually at risk of flooding in the most extreme climate change event.	Other than proposed planting / landscaping measures, the proposed development shall be restricted to land outside the modelled flood risk area.

The site would be best served via an improvement to the existing access arrangement, notwithstanding its location within flood zone C2.	Given that the existing access is outside of the area of modelled flood risk, the site can be served via this access point without the need for emergency access.
There is a mix of housing types and sizes in the local area, and there is a planning policy requirement for a minimum density of 30 dwellings per hectare.	The layout shall maximise natural surveillance, comprise of a mix of house types and sizes, and have a density of at least 30 dwellings per hectare.
The adjacent highway represents a hard boundary between the site and the adjacent industrial land, and over the highway verge is an easement for a highway drain which must be retained.	An appropriate set back distance between the proposed dwellings and the highway should be provided in order to minimise disturbance to the properties and to retain the highway drain easement.
The site is in a relatively sustainable location with certain local facilities and public transport links within walking distance.	Pedestrian permeability through the site should be maximised in the proposed layout.
The site forms part of the Cynon Valley River Park destination in the LDP.	Pedestrian permeability through the site should be maximised in the proposed layout. The biodiversity value of the site should be fully considered through appropriate survey work.
The site is part of an area of land reclamation that was carried out in the 1970s.	The stability and condition of the ground should be fully investigated and appropriate mitigation/remediation measures proposed as part of the site's development, where appropriate.

## Design Development

- 5.5 The scheme has evolved over time and there have been various iterations of the proposals up to the submission to the planning application. The initial proposals are indicated below:



### Layout Rev A

5.6 The first iteration of the scheme included a new access onto the B4275 and the development area extended across the highway verge (as the land is within the ownership of the applicant). However the pre-application enquiry highlighted the presence of a highway drain in this location. Following an update to the topographical survey to identify the location of this drain, the layout was updated as follows.



**Layout Rev C**

- 5.7 However, as dialogue with NRW progressed, it became clear that the modelled area of flood risk considered an unnecessarily high allowance for climate change. Originally at 70%, NRW agreed that this allowance could be reduced to 25%.
- 5.8 The reduction in the modelled climate change scenario reduced the area considered to be at risk of flooding. This allowed the existing access to be utilised, which not only has benefits in terms of the development cost, but also in terms of reducing possible conflicts the development may have with adjacent highway network.
- 5.9 The reduction in the flood risk area also has the benefit of freeing up land for development of additional units. Six additional walk-up flats have been included in the final layout, as seen below, bringing the total number of units to 38.



### Layout Rev G

5.10 Overall, the context analysis, combined with discussions with both the Local Planning Authority and NRW have resulted in the final proposals that form part of this application submission.

## Design and Access Proposals

### Character

5.11 The proposals are in outline form and much of the details that will contribute to the character of the scheme are therefore yet to be decided. However, there are certain relevant points discussed below.

- Placemaking – The proposals have been designed to effectively complement the new and existing residential streets to the west of the site, whilst forming an appropriate division between residential and industrial land uses. The utilisation of cul-de-sacs and the buffer between the site and the B4275, plus the existing mature trees to the north of the site, effectively achieve this.
- Amount and density – The layout shows an indicative proposal of 38 units, which represents a density of approximately dwellings per hectare (or approximately 35 dwellings per hectare if the existing access road that will be unaffected and the drainage ditch along the site’s western flank are excluded from the site area). The minimum density

of 30 dwellings per hectare outlined in the guiding principles has therefore clearly been met. This density reflects the planning policy context as well as neighbouring residential areas.

- Streets – The proposals involve a clear and easily distinguishable ‘main street’, being the internal spine road, plus three small cul-de-sacs. Details such as road surfacing are yet to be finalised, but are likely to involve a ‘shared surface’ approach in order to maximise traffic calming and create a pedestrian friendly environment.
- Spaces and public realm – As above, the ‘shared surface’ approach will contribute to a pedestrian friendly environment being created. The cul-de-sacs will create a courtyard feel and compensate for the lack of formal open space proposed. Soft landscaping is proposed across the site and details of this are to be provided at detailed design stage. The site is also surrounded by walking routes, publically accessible areas of open space and sports facilities.
- Mix of uses and tenure – The site is proposed solely for residential development; given its size and location, a mixed use development is not considered appropriate. A minimum of 10% affordable housing will be provided, in line with local planning policy. The proposals include a mix of dwelling types and sizes, ranging from 1 bedroom flats to 3 bedroom houses. The mix of dwelling types will contribute to the range of properties available in the local area and enhance the social mix.
- Scale – The specific size, height, width and length of buildings will be determined at detailed design stage. However, the submitted scale parameters information sheet sets out the upper and lower limits for height, width and length of the various dwelling types that could be included on the site. The inclusion of cul-de-sacs and wide streets will ensure an effective balance between public space and built form.
- Layout – The proposed layout has been designed to accommodate an appropriate density of development on the site, whilst ensuring there is a balance between public realm and private dwellings. The layout provides a reflection of some of the other new developments in the area, off Farm Road and Heol Ty Aberaman, whilst maintaining a degree of unique visual interest through its mix of dwellings and ‘courtyard’ feel.
- Heritage – There are no heritage assets in the immediate vicinity of the site that affect its development.
- Detail design – Appropriate materials and detailed design features will be incorporated, but this level of detail is unknown at outline stage.

## Access

- 5.12 The proposed development will be accessed in the north-west of the site, via improvements made to the existing access. This approach is considered most suitable as the access here already lawfully serves two residential dwellings and would avoid having to create a new junction directly onto the B4275.
- 5.13 The existing access track on the site, which serves the two adjacent dwellings, has been partially retained as part of the proposals, as it is a requirement of the title. The occupiers of the two dwellings would need to pass over the site's improved access and a dropped kerb onto the stretch of retained access track.
- 5.14 It is acknowledged that the pre-application response from the Council suggests an emergency access would be required given the existing access is at risk of flooding. However since pre-application advice was provided, further discussions with NRW have taken place and the modelled area at risk of flooding has been reduced and does not affect the site's access.
- 5.15 The indicative layout indicates one parking space per 1 bedroom flat and two parking spaces per 2/3 bedroom house. This detail will be confirmed at reserved matters stage, but is considered to be an appropriate level of parking given the site's sustainable location.

## Movement

- 5.16 As mentioned, the site's existing access will be improved and retained. An internal spine road with three small cul-de-sacs structures the development and provides direct access to each property. Parking is situated to either the front or side of each property and is well overlooked.
- 5.17 A Transport Statement and Travel Plan have been prepared by Acstro and are submitted in support of this application. The statement confirms that the proposals are acceptable in terms of highway capacity, given the modest number of vehicle movements associated with the proposed development of approximately 38 units and the sustainable location of the site. The Travel Plan encourages the use of sustainable transport modes, such as walking, cycling and public transport.
- 5.18 Each cul-de-sac includes a pedestrian access onto the B4275; there are therefore four pedestrian access points to the site, in total, maximising permeability. The surrounding road network is served by pavements/footways and there are bus stops located directly adjacent to the site, while Cwmbach railway station is just a 900m walk from the site and provides services in the direction of Barry Island (via Cardiff) and Aberdare. The proposed development therefore has excellent opportunities for utilising sustainable transport modes.

- 5.19 The site's internal access road includes a turning head at the southern end to allow refuse vehicles to turn and exit the site in a forward gear.

### **Environmental Sustainability**

- 5.20 The environmental and technical constraints have been fully assessed and accounted for in the design of the scheme.
- Landscape / habitat – Soft landscaping will be introduced across the site for visual enhancement. A Preliminary Ecological Assessment (PEA) has been undertaken and confirms that there is limited existing ecological value on the site itself, but that there are habitats for nesting birds and roosting / foraging bats adjacent to the site. To enhance this ecological potential, bat and bird boxes will be included on certain properties on the western flank of the site.
  - Energy and resource efficiency – As the proposals are only at outline stage, the details relating to energy and resource efficiency are not yet known. In any case, the dwellings will be required to be constructed to a high standard through Building Regulations.
  - Water and waste management – Suitable turning heads have been provided to allow refuse vehicles to exit the site in a forward gear. In terms of foul water management, a connection will be made into the existing public combined sewer north-east of the site. In terms of surface water management, an attenuation tank is proposed onsite with discharge at greenfield rates into the adjacent watercourse, controlled by a hydro-brake. Please see the submitted Drainage Strategy.

### **Community Safety**

- 5.21 As discussed above, the development has been designed and dwellings orientated to maximise natural surveillance of streets and car parking areas. The development will be simple to navigate given its clear distinction between the main spine road and the cul-de-sacs, each of which has direct pedestrian access onto the B4275. Finer details such as the lighting strategy, materials and planting that will contribute to community safety, have yet to be determined.

### **Response to Planning Policy**

- 5.22 This is addressed in the following section that covers the key planning issues.

## 6. Key Planning Issues

6.1 The key planning issues pertinent to the consideration of the application are as follows.

- Principle of Development
- Design
- Transport and Sustainability
- Flood Risk
- Housing Need
- Other Technical Matters (including drainage, ecology and ground conditions)

6.2 The issues have been touched upon through the above consideration of design and access proposals. However a summary of each key issue and consideration of any vital planning policies is provided below.

6.3 This is followed by a summary of the relevant planning considerations and material considerations to assist the local planning authority in making a balanced planning judgement.

### Principle of Development

6.4 The site is located within the settlement boundary of Aberaman on land that is not allocated for any particular use, according to the proposals map accompanying the LDP. The site is therefore in a sustainable location in planning policy terms, where new residential development is normally directed.

6.5 The site is located mostly within Flood Zone A, while a portion of the site is within Flood Zone C2, according to NRW's development advice maps. It is acknowledged that national planning guidance in relation to flooding makes no provision for residential development within Zone C2 and there is therefore a possible policy conflict in this respect. However, PPW does provide circumstances where development proposals defined as being in areas of high flood hazard can be considered.

6.6 The Council has acknowledged that, other than the site's location partially in Zone C2, the principle of development in this location is acceptable. The relevant aspects of policies AW1, AW2, AW5, NSA10, NSA11 and NSA12 have been complied with.

6.7 Given the flood modelling work undertaken and accepted by NRW, on balance, the principle of development is considered to be acceptable. Consideration of flood risk is provided in more detail below.

## Design

- 6.8 Although in outline form with detailed design reserved for later consideration, the design of the proposals have been fully justified through the consideration of design and access matters in the preceding chapters of this report. The layout of the scheme reflects the principles of good design and the character of the surrounding area, and is therefore considered to be compliant with the relevant provisions of LDP Policies AW5, AW6 and NSA10.

## Transport and Sustainability

- 6.9 The site is located sustainably within the urban area of Aberaman. Bus stops exist directly adjacent to the site on the B4275, while the next nearest bus stops are located a 450m walk south-west of the site on Cardiff Road, which provide regular services in the directions of Aberdare and Pontypridd. Furthermore, Cwmbach railway station is just a 900m walk from the site and provides services in the direction of Barry Island (via Cardiff) and Aberdare.
- 6.10 As discussed above, the site is very accessible by means of transport other than the private car. There are a range of local facilities nearby, including various out of centre retail stores, as well as Aberaman's local high street (Lewis Street), which is around a 1.3km walk away. There are also employment opportunities in close proximity to the site, including at the nearby industrial estates, various out of centre retail stores and in Aberaman town centre. There are also a number of nearby community facilities, including Aberdare Town FC and Abercwmboi RFC, Capcoch Primary School and the Tirfounder Fields pub.
- 6.11 The sustainability of the site's location and the strong potential for the use of sustainable transport modes are considered to be a strong material consideration in favour of the site's development.
- 6.12 The Transport Statement submitted with the application demonstrates the development's acceptability in highway terms. The scheme is considered to be in compliance with the relevant provisions within policies AW2, AW5 and NSA12.

## Flood Risk

- 6.13 A Flood Consequences Assessment (FCA) and Outline Drainage Strategy has been prepared and submitted with the planning application. NRW were consulted on the first draft of this FCA, and dialogue with NRW continued up to the preparation of the final document.
- 6.14 The outcomes of the FCA's modelling are that, while 40% of the site is within Zone C2:
- Defended 1 in 100-year plus climate change event (25%) and 1 in 1000-year flood event, the site remains flood free.

- Undefended 1 in 100-year plus 25% climate change event, approximately 10% of the site is affected by flood water located within the south western portion and drainage ditch. (Appendix A of JBA's modelling report).
- Undefended 1 in 1000 year plus 25% climate change event is similar to the 1 in 100 year event with approximately 10% of the site affected (Appendix A of JBA's modelling report).

6.15 In practical terms, the site does not flood in the extreme event (i.e. the defened scenario above) given the presence of a flood wall along Farm Road (see paragraph 3.6 of the FCA).

6.16 However, given this wall is a *de facto* flood defence, undefended models have also been run. What these 1 in 100-year plus 25% climate change and 1 in 1000-year plus 25% climate change undefended models show is that approximately 90% of the site would more accurately be categorised as Flood Zone A, as it is not at risk of flooding in an undefended scenario.

6.17 This would leave just 10% of the site in Zone C, and this 10% is restricted to the western flank of the site, primarily within the drainage ditch (the ground level of which is 2-3m below the rest of the site).

6.18 The proposed development has therefore been limited to the 90% of the site which is not considered to be at risk of flooding (only landscaping will be included within the 10% at risk of flooding).

6.19 While it is acknowledged that there is a policy conflict with TAN 15, given the document doesn't make provision for allowing residential development within Zone C2, this is considered to be a technicality. As discussed above, the principle of development on the site is considered to be acceptable despite the site's partial location within Zone C2, due to the thorough and diligent flood modelling work that has been undertaken to demonstrate that the development area is not at risk of flooding.

## Housing Need

6.20 The Borough has a significant shortfall in the amount of housing land available. The 2017 RCT JHLAS confirms that the Borough has just a 1.3 year supply of land for housing. This falls well short of the 5 year requirement stipulated in national planning policy.

6.21 Our client has owned the application site for several years and it now represents an important opportunity to contribute to the supply of land for housing. This has been acknowledged by the Council in their pre-application response. It is our considered view that, should outline planning permission be granted, there would be several prospective purchasers of the site, including housing associations, house builders and private developers.

- 6.22 The contribution that the scheme would make to the supply of housing land is a material consideration that weighs heavily in favour of the proposed development.

## Other Technical Matters

### Drainage

- 6.23 Welsh Water has confirmed that a foul drainage connection can be made to the existing public combined sewer adjacent to the site and there is currently capacity in the system. While the Cynon Waste Water Treatment Works has limited capacity, the LPA have been made fully aware of situation and have assumed a first come first served approach to the remaining capacity. Given capacity has not yet been reached, this is not considered to inhibit the prospect of this planning application.
- 6.24 A surface water drainage scheme has been prepared which is included within the Outline Drainage Strategy submitted in support of the planning application.

### Ecology

- 6.25 A Preliminary Ecological Assessment (PEA) has been undertaken and confirms that there is limited existing ecological value on the site itself, but that there are habitats for nesting birds and roosting / foraging bats adjacent to the site. To enhance this ecological potential, bat and bird boxes will be included on certain properties on the western flank of the site.

### Ground Conditions

- 6.26 A detailed site investigation report has been commissioned and will be submitted in support of the planning application.

## Summary and Planning Balance

- 6.27 The site is in a sustainable location within settlement boundaries and the proposed scheme makes effective and efficient use of land. The proposed development is considered to be acceptable in terms of its impact upon the highway network, biodiversity, visual impact, and the residential amenity of neighbours and future occupiers of the dwellings. Other than a technical conflict with national policy on flood risk (which has been demonstrated to have been overcome, to the agreement of NRW, through the submitted FCA), the proposed development is compliant with both national and local planning policy.
- 6.28 The sustainable location of the site and the opportunities residents will have to make use of transport modes other than the private car, as well as the important contribution the scheme would make to the acute need for housing in the Borough, are considered to be material considerations that weigh significantly in favour of the proposals.

- 6.29 The flood modelling exercise undertaken provides a more accurate representation of the flood risk posed to the site than NRW's development advice maps. NRW agree with the accuracy of the model, which is confirmed in the correspondence appended to the submitted FCA.
- 6.30 On balance, given the need to increase the supply of land for housing and the diligent work undertaken to demonstrate that the site is not at risk of flooding, it is considered that planning permission should be granted for the proposed development.

## 7. Conclusion

- 7.1 This Planning, Design and Access Statement has been prepared to accompany and support an outline planning application for residential development on the land off the B4275 at Aberaman. The applicant is seeking to obtain a flexible outline planning permission for residential development that will accrue interest from prospective developers when the site is marketed for sale.
- 7.2 Pre-application discussions with both the Council and NRW have led to the production of the final scheme and the submission of information that supports the application. An extremely diligent approach towards the site's flood risk constraint has been taken, and the information provided demonstrates that approximately 90% of the site is not at risk of flooding (even in an extreme, undefended scenario that accounts for climate change). This flood free 90% is the development area proposed, and the 10% at risk of flooding is almost entirely confined to the onsite drainage ditch.
- 7.3 Given that the development area has been demonstrated to be flood free, the conflict with TAN 15 is considered to be a technicality only. The principle of development at the site is acceptable in all other aspects.
- 7.4 The supply of land for housing and the delivery of new homes is a serious challenge in the Borough, particularly in the northern strategy area which the site sits within. The opportunity the proposals provide to contribute to the supply of land for housing simply has to be taken.
- 7.5 Applications for planning permission which are in accordance with the development plan should be granted unless material considerations indicate otherwise. The key material considerations at hand here are the technical conflict the proposals have with TAN 15, the FCA demonstrating the development area is flood free, and the crucial need to increase the Borough's supply of land for housing. On balance, as it has been demonstrated that the site is flood free, it is considered that the proposed development is acceptable in planning terms and permission should be granted.

# Appendix I

1 – Council's Pre-application  
Response (dated 01/11/17)

Mr Owain Griffiths  
GVA  
One Kingsway  
Cardiff  
CF10 3AN

Fy Nghyf/My Ref:  
17/5096/41

Gofynnwch am-Please ask for:  
Gareth Davies  
01443 494741

Dyddiad/Date:  
01/11/2017

**DATBLYGIAD** Residential development with associated access, drainage,  
**ARFAETHEDIG/** landscaping and other ancillary infrastructure.  
**PROPOSAL :**  
**LLEOLIAD** LAND OFF B4275, ABERAMAN, ABERDARE, CF44 6LJ  
**/LOCATION:**

I refer to your correspondence received on 4<sup>th</sup> October 2017, concerning the above and your request for pre-application advice.

Having considered the nature of the submission I can respond as follows.

### **Local Context and Constraints**

The site comprises an irregularly shaped parcel of land of some 1.25 hectares located immediately to the west of the cross valley link road at Aberaman. In the wider area areas to the south and west of the site are largely residential in character whilst areas to the north and east are more industrial in character.

Access to the site already exists on the northern boundary from an estate access road.

The principal constraint to the development of the site is that it lies partly within a c2 floodplain where residential development which is considered highly vulnerable development would normally be resisted. There are potential issues in respect of the drainage of the site given the presence of the highway drainage arrangements in the verge which forms part of the site. Additionally Dwr Cymru Welsh Water may raise issues in respect of Network Capacity and receiving treatment works capacity given the location of the site. The Council's drainage section takes the view that drainage of the site should demonstrably pursue the drainage hierarchy.

The site is located on Aberaman lands that was subject to a degree of reclamation in the 1970's however it is envisaged that further works may be required given the potential end user

*Please note that this information is based on our current records and is, as far as possible, accurate. Nevertheless we reserve the right to advise you of any additional constraints that may be identified at the time of your application.*

### **Relevant Planning History**

06/2448/13 – Office, Industrial and Warehouse development (500 sq m gross) and associated car parking – Approved 1<sup>st</sup> October 2007

### **Relevant Planning Policies**

In addition to national guidance contained within Planning Policy Wales, any application would be considered against the Policies within the adopted Rhondda Cynon Taf Local Development Plan, details of which are available on the Council's website by visiting [www.rctcbc.gov.uk/ldp](http://www.rctcbc.gov.uk/ldp). The relevant policies would include:

#### **Core Policies**

**Policy CS 1 – Development in the North**

**Policy CS 4 – Housing Requirements**

**Policy CS 5 – Affordable Housing**

#### **Area Wide Policies**

**Policy AW 1 – Supply of New Housing**

**Policy AW 2 – Sustainable Locations**

**Policy AW 4 – Community Infrastructure & Planning Obligations**

**Policy AW 5 – New Development**

**Policy AW 6 – Design and Placemaking**

**Policy AW 8 – Protection and Enhancement of the Natural Environment**

**Policy AW 10 – Environmental Protection and Public Health**

#### **Northern Strategy Area**

**Policy NSA 10 – Housing Density**

**Policy NSA 11 – Affordable Housing**

**Policy NSA 12 – Development within and adjacent to Settlement Boundaries**

**Policy NSA 26 – Cynon Valley River Park**

**Policy NSA 27 – Land Reclamation Schemes**

While the principle of development is considered acceptable in relation to certain aspects of policies AW1, AW2, AW5, NSA10, NSA11 and NSA12, large parts of the western side of the site are significantly constrained by flooding issues given the C2 flood zone designation and these matters are dealt with in greater detail below.

In addition to the Supplementary Planning Guidance included in your letter your client should also have regard to that relating to Employment Skills Training Plans.

### **Analysis of Proposal**

The proposal could potentially bring forward new residential development on a site that lies within established settlement limits and that is not allocated in the adopted Local Development Plan for any specific use. This could therefore as a windfall site make a small but valuable contribution to improving the housing land supply for the County Borough in a relatively sustainable location.

The site lies within an area that is £0 rated in terms of the Community Infrastructure Levy. Any residential development of this site would be required to provide 10% affordable housing in line with the requirements of the Local Development Plan and Supplementary Planning Guidance

The location of the site close to industrial uses gives some concern for the relationship the development would have with industry and the developers should satisfy themselves that the two could comfortably coexist. That said, it is acknowledged that the cross valley link road and estate access road (which forms the northern boundary of the site), represent strong boundaries to the potential limit for residential development in this area.

The submitted preliminary environmental assessment of the site is on the whole considered acceptable in terms of the recommendations made; however, any changes in the levels of the site that would be brought about by its development would have to address the impact of such works on the trees and hedgerow that form part of the boundary.

With particular reference to the flooding issue, I would draw your attention to the recent decision in respect of 487 houses and a school at Ystrad Barwig where the inspector took the view that where paragraph 6.2 of technical advice note 15 says *“highly vulnerable development and emergency services in zone C2 should not be permitted”* that there is no need to consider the matter further. This is an issue that you might want to consider with regard to any future submission.

With regard to highway related matters, your client should first note that the location of highway drainage serving the B4275 cross valley link is a potential constraint to the development of the site as identified above. Other than that the road geometry of

the indicative scheme appears acceptable subject to design details being agreed. It is recommended that any residential development of the site would be best served by an improvement of the existing access arrangements; however, given the location of the existing access lies within the C2 floodplain zone detailed site layout should also make an allowance for an emergency access that is not. Parking provision should be made to the relevant standard at the time detailed proposals are considered.

### **Required Supporting Documentation**

We would encourage you to submit your application electronically via [www.planningportal.gov.uk](http://www.planningportal.gov.uk)

Having regard to the nature of your proposal and the information that has been submitted it is considered at this stage that in addition to the submission of standard mandatory supporting documentation such as application forms and plans, any application for the above development should also be accompanied by the following additional documentation:

- Habitat Survey /bat Survey
- Tree Survey
- Site survey identifying existing ground levels, plus details of proposed levels including sections / cross sections.
- Contaminated land survey

If any subsequent application fails to include the information above, there is a chance it may not be registered and, in any event, it is likely that an application will either be refused or will not be progressed until its satisfactory submission.

It is also recommended to applicants that detailed information is submitted at application stage to ensure that, in the event of planning permission being granted, that 'pre-commencement' conditions (which require approval of details prior to work starting on site) can be minimised. You are therefore encourage to ensure that your initial submission incorporates as much information as possible (for example materials, boundary treatment, ecology mitigation, Construction Management Plan, Travel Plan etc.), and address all matters raised in the advice given above.

Detailed guidance on the use of the national standard application form for planning permission and other associated consent regime; and the information which must accompany a planning application so that the Local Planning Authority can determine the validity of the application, can be found as follows:

"Guidance on the use of the standard application form ('1app') and validation of applications":

<http://gov.wales/topics/planning/policy/guidanceandleaflets/1appguidance/?lang=en>

The Town and Country Planning (Development Procedure) (Wales) Order 2012:  
<http://www.legislation.gov.uk/wsi/2012/801/contents/made>

### **How we will deal with your planning application**

Once your application has been received it will be allocated a reference number and case officer. We will check the application to make sure it complies with the statutory requirements and we will contact you by phone or email to advise you of any discrepancies. We will also work with you to address any outstanding concerns, including amendments required to make your proposal acceptable.

Once we are happy with the validity of your application, we will formally consult neighbours and relevant consultees. Provided there are no significant matters of concern resulting from such consultations we will seek to determine your application as swiftly as possible after the expiry of the statutory publicity period, and aim to do so within the 8 week statutory period.

While officers endeavour to ensure you are aware of the progress of your application, we would encourage you to contact the case officer or our Planning Process team to discuss any matters further.

### **Building Control**

The Planning and Building Control teams work closely to assist developers in improving the quality of their development and ensuring compliance with all appropriate conditions and Regulations. In particular, Building Control provides a competitive and highly professional service and seeks to actively engage with developers at the earliest stage of their project. You are therefore encouraged to contact the Building Control team on (01443) 494746 or by emailing [BuildingControl@rctcbc.gov.uk](mailto:BuildingControl@rctcbc.gov.uk).

#### Request for further advice

Following receipt of this initial advice, should you wish to discuss your scheme prior to a formal submission, please contact the case officer on the direct number or email given above. Further charges may apply.

Yr eiddoch yn gywir / Yours sincerely,

Gareth Davies

**Please Note:**

The advice given in this response represents an informal opinion, provided in accordance with the Council's Planning Pre-Application Service. In particular, it is emphasised that while this pre-application advice will be carefully considered in reaching a decision or recommendation on an application, the final decision on any application that you may make can only be taken after we have consulted local people, statutory consultees and any other interested party. It does not therefore prejudice any decision which the Local Planning Authority may make should an application be submitted.

# Contact Details

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## Enquiries

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## Visit us online

[gva.co.uk](http://gva.co.uk)

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## GVA

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