

Planning, Design and Access Statement

Mill Street, Tonyrefail

November 2020

amity
planning consultants



Introduction

Client This statement has been prepared on behalf of Lewis Homes Ltd.

Scope This statement accompanies 2no. applications being promoted at the Land at Mill Street, Tonyrefail.

An outline application is being submitted in relation to the whole site (please refer to Site Location Plan extract at Figure 1). The description of development is **'Outline application for residential development of up to 120 dwellings together with associated works (all matters reserved except for access)'**.

In parallel to the outline application, a full application for the northern part of outline application site (including the access point) is being progressed, which will be referred to through out this statement as Phase 1. The description of development for Phase 1 is **'Full application for residential development of 42 affordable dwellings together with access improvements, parking area, roads, drainage infrastructure, landscape planting and associated works.'** (please refer to Site Location Plan extract at Figure 2).

Due to the integrally linked nature of the outline application and the application for Phase 1, this Planning, Design and Access Statement accompanies both applications.

Site Details

Site Address Land at Mill Street, Tonyrefail

Site Location

Fig.1 Outline Application Site

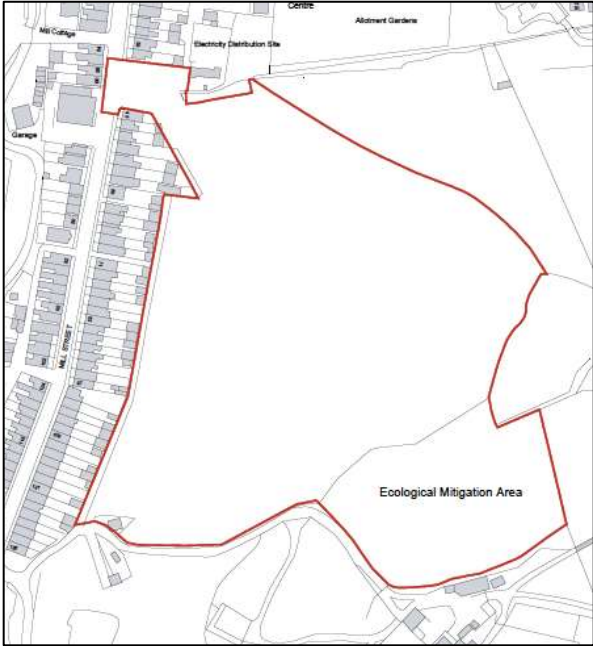
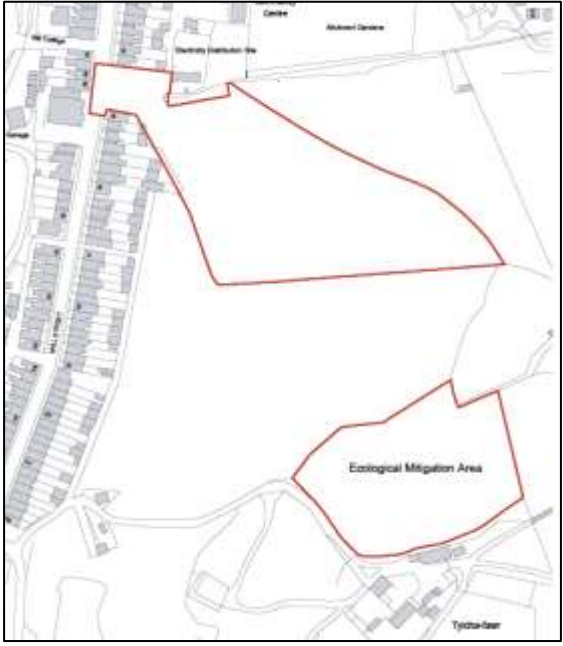


Fig 2. Phase 1 Full application site



Site Description and Surrounding Area

Site Description

The application site is located on the urban edge of the settlement of Tonyrefail and comprises predominantly of five identifiable field parcels enclosed with natural boundaries. The site also comprises land currently in use as allotments to the west. The outline site measures approximately 5.172 ha but a small portion, approximately 0.3ha, previously accommodated a workingman’s club house which has been demolished. The area where the clubhouse was previously located is now a

hardstanding. The field parcels are characterised by poor quality semi-improved grassland which is currently unmanaged. The Phase One application site measures 2.52ha and forms the northern portion of the outline application site (including the former clubhouse land).

Centrally to the site, immediately south of the hardstanding area, is a woodland which includes mature and immature trees including oak, ash, holly, beech and hawthorn.

Power lines run through the site from the access point to the north to the south east.

The site falls from south east to north west with levels ranging from approximately 135m AOD in the south to 124.8m AOD in the north west corner. These levels have been derived from the topographical survey.

The site access is currently from Mill Street to the north east which served the former workingman’s club. The existing access is adopted highway and also provides access to the Western Power substation and plant depot located to the north of the application site. Mill Street is parallel to the west of the site and is the main road linking the southern part of Tonyrefail to the High Street to the north.

Surrounding Area

In a wider context, Llantrisant is approximately 6km and Cardiff approximately 22km to the south east. Bridgend is approximately 13km to the southwest. The site is located on the edge of the settlement of Tonyrefail. It is located within 50m distance of the town centre and well located for other services located in Tonyrefail including a school, open space and doctor’s surgery all within walking distance of the site.

The application site’s immediate surroundings are residential development to the west, allotments to the north and open countryside to the east and south. There is, however, a farm house and associated yard known as Tylcha-Fawr farm located adjacent to the southern boundary of the site.

Proposed development

Outline Application

This outline application seeks permission for residential development 120no. dwellings will all matters reserved except access. The house-types will include bungalows, dwellings and apartments and the scale parameters are detailed in Table 1 below.

Table 1: Scale Parameters

Scale Parameters						
Unit Type	Minimum Width	Minimum Length	Minimum Height	Maximum Width	Maximum Length	Maximum Height
Bungalow	5m	6m	4m	11m	14m	6.5m
House	4m	5m	5.5m	11m	12m	10.5m
Apartment	4m	5m	5.5m	15m	15m	10.5m

Whilst the proposed site layout is illustrative at this stage, it demonstrates that each plot, aside from flats, is capable of accommodating on plot parking and a rear garden of varying size depending on the size of the dwelling. The flats will likely be walk-up units and have a shared amenity space to the rear and parking either on plot or adjacent to the proposed flats.

The southern most field is not intended to be developed but included within the application site to provide ecological mitigation measures. The proposed mitigation measures include ecologically friendly planting and retention of existing natural features.

The development of the site will be split over two phases, which is reflected by the submission of a parallel full application in relation to Phase 1.

The outline application includes details of the strategic access into the site via the existing access off Mill Street. The access will be subject to substantial improvement works to facilitate the access including the realignment of the existing road and providing of a mini-roundabout junction. The proposed access into the development will be built to adoptable standards including a 5.5m carriageway and 2m footways either side. The proposed access road will lead south east into the site, parallel with the rear boundaries of number no. 45 to no. 59. The internal road network is reserved for later consideration but will likely include a main spine road which splits to the east and west, both terminating in towards the southern portion of the site. Private driveways will spur off the main spine roads to serve small cul de sacs of development.

The illustrative masterplan layout demonstrates that the proposal is capable of utilising the existing green infrastructure and incorporating it into the development. The existing field boundaries will be retained and serve as green corridors throughout the development. Where possible the retained natural boundaries will be located in public spaces to ensure their long term protection.

Phase One

The proposed access to serve Phase 1 is the same as proposed in the outline application, as discussed above.

Phase one proposes 100% affordable housing, including the following mix of units:

House Type Schedule - Phase 1 (Plots 1 to 42)						
	House Code	Net Floor Area (ft ²)	Number of Bedrooms	House Type Name	Number of Units	Total Net Area of Each Unit (ft ²)
Affordable Units	2.1.1	546	1	1 Bed Flat	8	4368
	1-2BF	643	1	1 Bed GF Flat Adapted	7	4501
	1-2BF	764	2	2 Bed FF Flat	7	5348
	3.2.3	643	2	2 Bed Bungalow	4	2572
	AD-B	1215	3	3 Bed Adapted Bungalow	4	4860
	4.2.1	898	2	2 Bed 4 Parson House	8	7184
	7.4.1	1254	4	4 Bed 7 Person House	4	5016
Total No. of Units & Total Net Area (ft²)					42	33849

Phase one also includes the field parcel to the south east which will incorporate the ecological mitigation and enhancements for Phase one and the wider outline site.

Phase will also incorporate a detention basin which will provide Suds as well as important green infrastructure.

At the most northern part of Phase one 9no. car parking spaces are proposed to serve existing residential dwellings along Mill Street.

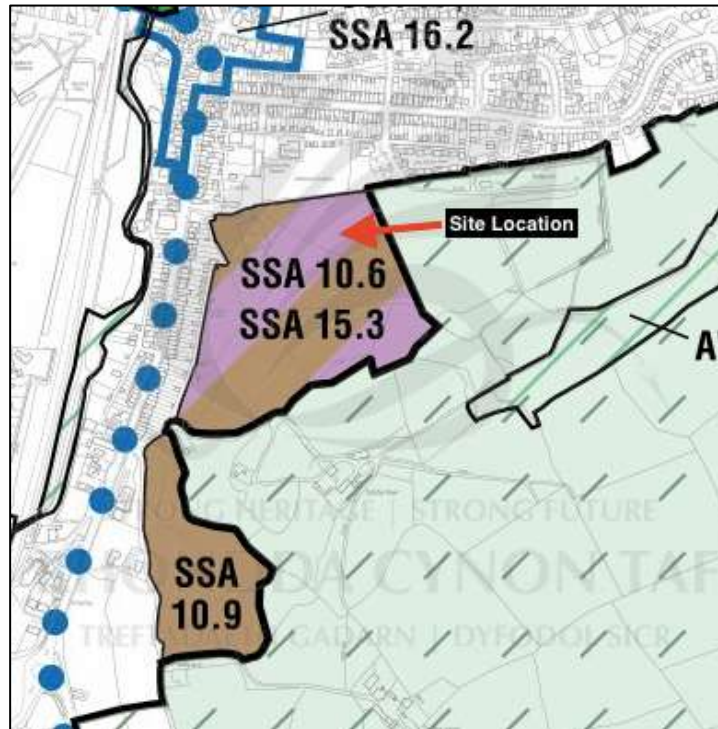
Relevant Planning Policy

Planning Policy Wales

Planning Policy Wales (PPW10) Edition 10 (December 2018) is the overarching planning policy document for Wales. It sets out the land-use policy context for the consideration and evaluation of all types of development. Elements of PPW are of direct relevance to the determination of this application, as detailed in the following section.

<p>Technical Advice Notes</p>	<p>Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:</p> <ul style="list-style-type: none"> • TAN 5: Nature Conservation and Planning • TAN 10: Tree Preservation Orders • TAN 12: Design • TAN 18: Transport
<p>Development Plan</p>	<p>In accord with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the development plan (in this case the adopted Rhondda Cynon Taff County Borough Council Local Development Plan) unless material considerations indicate otherwise.</p> <p>The Development Plan for the area comprises:</p> <ul style="list-style-type: none"> • Rhondda Cynon Taff County Borough Local Development Plan (2006-2031) (adopted January 2020) and the relevant policies are: <ul style="list-style-type: none"> ○ Policy CS 2 – Development in the South ○ Policy CS4 – Housing Requirements ○ Policy CS 5 Affordable Housing ○ Policy CS 7 – Retail Development ○ Policy AW 1 – Supply of New Housing ○ Policy AW 2 – Sustainable Locations ○ Policy AW 4 – Community Infrastructure and 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 ○ Policy SSA 4 – Development in the Key Settlement of Tonyrefail ○ Policy SSA 10 : Housing Allocations ○ Policy SSA 11- Housing Density ○ Policy SSA 12 – Affordable Housing ○ Policy SSA 13 – Housing Development within Settlement Boundaries ○ Policy SSA 15 – Retail Allocations ○ Policy SSA 23 – Special Landscape Areas <p>The relevant supplementary Planning Guidance is as follows:</p> <ul style="list-style-type: none"> • Design and Placemaking; • Affordable Housing • Nature Conservation • Planning Obligations • Access, Circulation and Parking • Development of Flats <p>The site is subject to the following designations within the adopted Local Development Plan:</p> <ul style="list-style-type: none"> • Within settlement boundary; and • Policy SSA 10 Housing allocation (reference SSA10.6) • Policy SSA 15 Retail Allocation (reference SSA 15.3) • Partially within a Special Landscape Area • Within 450m of a Cae’r-ysgol Woodland Site of Importance for Nature Conservation (SINC) • The site is within 7.3km of the Blackmill Woodland Special area of Conservation (SAC) <p>The relevant extract of the Local Development Plan Proposals Plan is overleaf.</p>

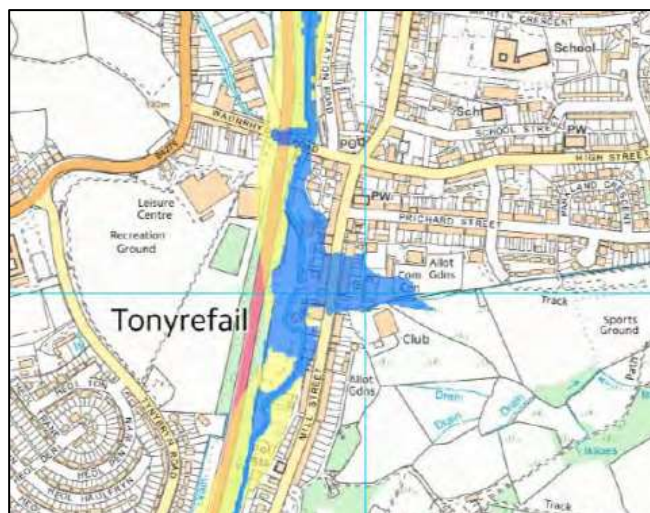
Fig.3 LDP Proposals Map extract



Flood Risk

The TAN 15 Development Advice Maps identify the site as mainly lying within as Zone A (Considered to be at little or no risk of fluvial or coastal/tidal flooding) but a small part of the site access being located in Zone C2 (at risk of flooding and not served by flood defences).

Fig 4. DAM Map



Planning History

Planning History

The following planning history is of relevance:

18/0313/10: LAND TO THE EAST OF MILL STREET, TONYREFAIL

Proposed two Class A1 (retail) units, three Class A3 (food and drink) units, highways infrastructure, car parking, servicing arrangements and associated works.

The application related to the development of a small portion of the site, whilst it also included as an indicative site plan which illustrated the potential phased residential element.
Approved September 2019

Design and Access Assessment

Character

Placemaking

PPW 10 puts emphasis on placemaking and creating a more prosperous, resilient and healthier Wales to improve the lives of current and future generations. The national placemaking outcomes in PPW 10 have been fundamental in the evolution of the proposed development to ensure it meets the requirements whilst also providing a high quality environment for future occupiers. This is discussed in more detail below in respect of the whole development (outline and Phase one).

Facilitating Accessible and Healthy Environments

The proposed development seeks to deliver an LDP allocated residential development to provide much needed housing in Tonyrefail. The types of units, including bungalow, dwellings and apartments some of which will be adapted, will provide a range of housing choice for the local community. The proposal provides equality of access and will support inclusivity and cohesion within the small community it creates on site and in the wider settlement.

The development will include areas of open space and a strong network of green infrastructure which can be secured at outline stage. The elements of the proposal will assist in creating a distinctive and natural public realm which will encourage a sense of place for future occupiers and enhancing their well being.

The housing allocation itself, through the rigorous assessment it was subject to via the LDP process, was deemed to be sustainable and a suitable location for residential development (sustainability of the application site is described in more detail below under the sub-heading 'Movement'). The development of the site assists the LDP in fulfilling its projected housing growth and, therefore, supports the growth of the population and provides much needed homes.

Creating and Sustaining Communities

The proposed development seeks to integrate up to 120no. dwellings in a mix of private and affordable tenure into the existing community of Tonyrefail to meet the identified housing needs. The proposal is an appropriate density of 28no. dwellings per hectare (excluding the ecological mitigation area since it does not represent developable land). The density is lower than the Welsh Government requirement of 35 dwellings per hectare because the application site is an edge of settlement location, constrained by topography and existing natural features which are important to be retained i.e. hedgerows. Whilst the development is a lower density than typically required, it represents the most efficient use of the application site given its natural features.

The site has been carefully considered, taking into account the advice gained at pre-application stage, to integrate two high-quality outdoor amenity spaces to enhance well-being for the future occupiers.

Furthermore, the additional homes will support the function of the key settlement of Tonyrefail and will help sustain the community via planned growth in accordance with the targets of the LDP.

Making Best Use of Resources

The proposal makes the best use of the land at the application site, as discussed above. The application site is also, in part, brownfield and the re-use of previously developed land fulfils the requirements of PPW10 in terms of sustainable development and best use of land.

The proposed development is high quality and will be built in accordance with with up-to-date Building Regulation Standards, achieving a good standard of energy efficiency. The affordable units will be built in accordance with Welsh Government Design Quality Requirements.

In terms of natural resources, the application seeks to maintain and enhance natural features within the application site which will enable strong ecological connectivity, enhancing the resilience of ecosystems.

Maximising Environmental Protection and Limiting Environmental Impact

The proposal has purposely kept the development density to a reasonable level to ensure the existing green infrastructure can be protected as far as possible thus limiting the impact of the development on the natural environment. The proposal seeks to retain the most important natural features and enhance them to support the biodiversity habitats on site and support ecological connectivity across the site and within the wider area.

The proposal includes an area of 0.93ha dedicated for ecological mitigation and enhancement ensuring the requirements in relation to biodiversity enhancements of PPW10 and the duty under the Environment (Wales) Act 2016 are met.

Additional biodiversity enhancements are also proposed in the form of bird boxes, bat boxes, and ecologically sensitive landscaping. Such measures can be secured via planning conditions.

The site is characterised by a high level of green infrastructure which not only enhances the appearance of the proposed development but also complements its edge of settlement location. The distinctively green and natural features integral to the proposal will enhance the visual connectivity of the site with its edge of settlement location ensuring the proposal appears as a natural extension to Tonyrefail.

Surface water will be managed sustainably via SuDs and the scheme will be required to obtain approval for the surface water drainage arrangement via the Sustainable Drainage Approval Body.

Growing Our Economy in a Sustainable Manner

The provision of housing in accordance with the planned growth within and LDP enhances the viability and vitality of settlements and ensures sustainable growth. This in turn supports the economy of local areas in accordance with PPW10.

The retail allocation relating to the site will not be delivered since it is not considered it would enhance the economy and potentially detract from Tonyrefail town centre by taking footfall away from the main shopping streets. This is discussed in more detail later in this Statement in the Planning Appraisal section.

The placemaking outcomes of PPW 10 have been integral in the development of the scheme. The discussion above indicates how the scheme has embraced place-making to ensure the requirements of PPW 10 are embedded into the scheme. These principles will also inform a later reserved matters scheme and the parallel Phase 1 application.

The specific design and access considerations will now be addressed below.

Amount and Density

Outline Application

The amount of development includes up 120no. dwellings including the following types of housing:

- Standard dwellings;
- Bungalows; and

- Apartments.

Phase 1

The amount of development includes up 42no. dwellings including the following types of housing:

- 15no. 1bed flats;
- 7no. 2bed flats;
- 4no. 2bed bungalow;
- 4no. 3bed bungalow;
- 8no. 2bed house; and
- 4no. 4bed house

The overall site density equates to 28 dwellings per hectare. This represents an efficient use of land and is discussed in more detail later in this Statement.

Mixed Use and Tenure

The scheme proposes an entirely residential development of up to 120no. dwellings in a mix of private and affordable dwellings. The level of affordable housing proposed is 20% which meets the requirements of Policy SSA 12.

Layout

The illustrative masterplan layout for the outline application is below and Phase One proposed layout plan is overleaf.

Fig. 5 Illustrative Masterplan for Outline Application



Fig. 6 Proposed Site Layout for Phase One



The layout (outline and Phase One) incorporates the following key principles:

Open Spaces and Green Infrastructure

The site is bounded by residential dwellings to the west, allotments to the north and open countryside to the east and south. The following has been achieved in this regard to this layout:

- 2no. detention basins which will be grassed and occasionally hold water;
- An area of public open space along the western boundary incorporating existing trees;
- The existing trees and hedgerows which demarcate the field parcels which will be retained and incorporated into the site layout; and
- Dedicated ecological mitigation area adjacent to the south east of the development area.

Street Pattern

The wider scheme is in outline only and, therefore, detailed plans will be subject to reserved matters stage approval. In principle, the street pattern is likely to incorporate a main spine road which will lead from the existing access via Mill Street southwards and split east and west before leading to the south of the site before terminating with turning heads. Private drives will spur off the main spine road and serve up to 5no. dwellings. This street pattern is demonstrated on the proposals for Phase One.

Key vista within the site are terminated with larger buildings or landscaping to provide high quality streetscenes and enhance the overall townscape.

Scale

The proposed scale parameters are detailed earlier in this statement and will not be repeated. It is clear from the parameters proposed that the scale of units, at a maximum of 10.5m in height, will be in keeping with the existing development of Tonyrefail. The proposal will seamlessly integrate with the wider townscape of Tonyrefail, appearing as a natural and logical extension to the settlement.

Appearance

Outline Application

The application is in outline at this stage and, therefore, specific house types have not been prepared at this stage and will be agreed via reserved matters stage.

The design principles which will inform the layout, and influenced by the parallel Phase 1 application, will be traditional in form with modern high quality materials, reflecting the materials palette proposed on Phase One, discussed in more detail below.

Phase One Application

Extracts of the house types on Phase One are overleaf. As can be seen, the proposals are traditional and simply formed dwellings which are in keeping with the surrounding context and edge of settlement location.

The materials palette includes a mix of render, grey brick to DCP level, coloured cladding, dark roof tiles and grey UPVC windows.

Fig. 6 Walk up Flat example



Fig 7. Standard Dwelling Example



Fig. 8 Bungalow example



Access

The proposed development is in outline at this stage with only the main access point to be agreed. Phase One also includes the same access proposals. The main access will be via the existing access off Mill Street. This access will be enhanced by the introduction of a mini-roundabout junction and localized widening where required.

Internally in relation to Phase One, the main spine road will be built to adoptable standards and the private drives will have a less formal layout and have shared-surfaces to give equal importance to all users, reducing the traditional dominance of motor vehicles.

The internal access arrangements for the outline application are not for consideration at this stage. They will, however, reflect a similar pattern to Phase One in terms of road layout and street hierarchies.

All properties are designed to a high standard to ensure high quality housing. The affordable units will be designed to meet Development Quality Requirements (DQR) and Welsh Housing Quality Standards (WHQS), accommodating the movement of people with varying degrees of mobility and sensory impairments.

Parking spaces would be well related to the properties which they serve and would benefit from high levels of natural surveillance.

All properties would be designed to DDA requirements, including the provision of level/ramped access, minimum door widths and downstairs toilet facilities.

Movement

The Site is in highly sustainable location with local services, public transport and cycling routes all easily accessible on foot.

Local Services and Facilities

The application site is in an extremely sustainable location. It is approximately 50m from Tonyrefail Town Centre which has shops, banks, food outlets, a post office and other facilities and services you would expect to find in a town centre. The facilities include convenience shops, takeaways, hair dressers, banks, petrol station and pharmacy. There is an open space and 3G pitch within 50m of the application site access. Park Lane doctor's surgery is approximately 500m to the south of the application site.

Public Transport

The nearest bus stops to the site are located on Mill Street, approximately 50m to north of the site access. From these stops, Service 124 and 152 operate at an approximate 20-minute frequency in each direction. These services link the site with Maerdy, Porth, Cardiff and Tonypany. In addition, there are bus stops on High Street, where Services 122 and 150 can also be accessed to allow travel to Cardiff and Gifach

	<p>Goch, with up to 7 services per hour in each direction. The journey time via bus between the site and Talbot Green is circa 20 minutes and to Cardiff the journey time is approximately 60 minutes.</p> <p>Porth Railway Station is 3.7km to the north, accessible by bus in circa 20 minutes, bicycle in circa 25 minutes and car in 10 minutes. The nearest bus stops provide links to Porth Railway Station, whereby services are provided at an approximate 30-minute frequency in each direction between Cardiff and Treherbert.</p> <p><u>Cycling</u> The site is well located to capitalise on existing cycle provision, namely National Cycle Network (NCN) Route 4 which offers a mixture of off-road and on-road cycle provision eastward to Pontypridd and beyond and westwards to Brynmenyn and beyond. LTN1/04 identifies that the mean average length for walking journeys is approximately 1 km (0.6 miles) and for cycling 4km (2.4 miles), although journeys of up to three times these distances are not uncommon for regular commuters. As such, a maximum 12km (7.4 mile) commuter distance applies.</p> <p>The site's location reduces the need to travel by private car and future occupiers have viable options to walk, cycle or use public transport in accordance with the Sustainable Transport Hierarchy contained in PPW10.</p>
<p>Environmental Sustainability</p>	<p><u>Landscape/Habitat</u> Retention of existing green infrastructure and the introduction of new landscaping is an integral part of Phase One and the wider outline application.</p> <p>Both schemes seek to retain the most important landscape features to enhance biodiversity, connectivity of habitats whilst also enhancing the appearance of the proposed development.</p> <p>The ecological mitigation includes the retention of on site features but also the retention of a field parcel dedicated to ecological mitigation including enhanced landscaping and features to increase its biodiversity. The ecology benefits of the scheme are discussed in more detail later in this Statement.</p> <p><u>Energy and Resource Efficiency</u> All housing within the scheme will be constructed to the latest building regulation standards.</p> <p><u>Water and Waster Management</u> Foul drainage will be disposed of via the main sewers. Surface water will be dealt with via the Sustainable Drainage Approval Body which ensures surface water management is environmentally sustainable and has wider benefits in terms of ecology and water quality.</p>
<p>Community Safety</p>	<p>The design of the scheme has been carefully considered to help design out crime, in accordance with Secured By Design principles. All vehicular access into the development would be via Mill Street, which benefits from high-levels of natural surveillance. The layout ensures that all streets within the development are afforded a strong active frontage and high-levels of natural surveillance. The on-site public open space has been located and designed so that it is accessible, usable and desirable, with high-levels of natural surveillance from adjacent properties and public areas. Car parking has also been located where it would benefit from natural surveillance.</p> <p>Window orientation within the development has been designed to encourage natural surveillance of shared space while 1.8m close-boarded fences and 2.1m close-boarded fences/wall around the private rear gardens, where appropriate, will provide secure amenity space for residents.</p>

Planning Analysis

Land Use Planning and Sustainability

Para 1.2 of PPW identifies its primary objective as ensuring *“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, as well as the Well-being of Future Generations (Wales) Act 2015 and other key legislation.”*

Sustainable development is defined within PPW as *“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.”*

Para 1.17 of PPW goes on to state:

“A plan-led approach is the most effective way to secure sustainable development through the planning system and it is essential that plans are adopted and kept under review. 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.”

Para 3.48 encourages higher-density development in highly sustainable locations, stating:

“Planning authorities should reassess development sites which are highly accessible to non-car modes and allocate them for travel intensive uses such as offices, shopping, leisure, hospitals and housing of sufficient density to fully utilise their accessibility potential.”

With regard to land-use planning and sustainability, the following LDP policies are relevant:

Policy CS 4 relates to the provision of new homes and requires 14,385 additional homes to be built over the plan period. Policy CS 5 requires the development of 1770 affordable dwellings to address the identified need during the plan period.

The application site (both the outline application and Phase One) is within the Southern Strategy Area (hereafter referred to as SSA) and Policy SSA 10 outlines the allocated residential sites in the SSA for the Local Development Plan and allocates the application site is allocated for 100 dwellings (allocation reference SSA 10.6).

Notwithstanding the site’s allocation, it is also located in Tonyrefail which is identified as a Key Settlement whereby sustainable growth is encouraged in Policy CS 2.

The site is an allocated housing development site, partially brownfield land and within the defined settlement boundary of Tonyrefail, and so its development for residential purposes accords fully with the LDP Plan.

Notwithstanding the established principle of development, it is also relevant to consider the housing delivery of the LDP from its adoption to date. The up to date Annual Monitoring Report, 2019 (hereafter referred to as AMR) for the LDP has indicated that housing has not been delivered at the levels required by the LDP. Policy CS 4 requires 14,385 new dwellings to be constructed over the LDP period, which equates to 959 dwellings per year. By 2019, it was expected that 12,467 dwellings would have been constructed, however, only a total 6,299 have been completed from 2006 up to April 2019. Resulting in a requirement for a further 8,086 dwellings to be constructed by the end of 2021 (i.e. in circa. 14 months).

	<p>The housing delivery has been significantly less than envisaged and, therefore, it is essential that housing is delivered where possible to address the deficit in housing delivery.</p> <p>Furthermore, the applicant is a Registered Social Landlord and they have promoted the application on the basis of just over 38% of the total development being offered of an affordable tenure. Policy CS 5 which relates to the delivery of affordable housing requires the delivery of 1770 affordable dwellings during the life of the LDP. The proposed affordable housing contribution proposed seeks to provide over and above the 20% contribution required by Policy SSA 12.</p> <p>Additionally, the applicant, Rhondda Housing Association, has a strong track record of constructing affordable new homes in the Borough and the Local Planning Authority can be assured the development will be delivered.</p> <p>The delivery of housing on the application site is in accordance with the relevant policies and will assist the Council in delivering much needed housing and, therefore, the principle of development is established.</p>
<p>Lack of Retail Provision</p>	<p>It is acknowledged that Policy SSA 15 requires 2000m² of new retail floor space to be provided as part of the overall development of the site (allocation reference SSA 15.3). The purpose of the allocation, as stated in the commentary text to the policy, is to support the key settlement of Tonyrefail. The LDP states that since Tonyrefail is a smaller than other key settlements in the Borough new allocations would support the settlement. Commentary to Policy SSA 15 also advises that a new access point from the site to High Street would integrate the allocated retail floorspace with the wider town centre.</p> <p>The proposed development does not include any retail floorspace and whilst, on the face of it, this is not compliant with policy it is considered necessary at this juncture in the life of the LDP to consider, firstly, the need for the retail unit and, secondly, to weigh the potential need against other material planning considerations, namely, the provision housing and delivery of a LDP housing allocation. This is discussed further below.</p> <p><u>Need for Retail Units</u></p> <p>The requirements of the Policy SSA 15 are acknowledged and the intention of the retail allocation at the application was intended to support the existing town centre. In order to assess whether there is a need for the units the Retail Capacity Assessment (hereafter referred to as RCA) which supported the LDP preparation has been reviewed. The RCA concluded that the capacity for convenience goods floorspace existed in Zone 4 (zone 4 referring to the southern area of the borough and not including Tonyrefail). The RCA also concluded that there may be a need for comparison goods floorspace in the long term but recommended that specific allocations not be made in the LDP and to be made in subsequent LDP reviews. As such, it is clear that the inclusion of retail allocations in the LDP were not necessary to support the provision of sufficient retail offer within the Borough during the plan period. The lack of this retail offer being provided will not, therefore, undermine the retail offer in the Borough or result in any harm. This discussion is not intended to undermine or question the allocation itself since it is accepted policies for retailing are necessary to secure, enhance retail offer by providing clear opportunities for retail development. In this case, however, it is clear the lack of a retail offer at the site will not be to the detriment of the retail offer in the Borough.</p> <p>Notwithstanding the above, the latest Annual Monitoring Report of the LDP undertaken in 2019 has indicated that Tonyrefail town centre currently has 24.07% vacancy rates, the highest of any town centre in the Borough. The vacancies rose by 6% since 2018 and 16.52% since 2012 when the vacancy rates was at just 7.55%. The AMR considered the decline in occupancy rates follows a national trend of declining high street outlets which is also reflected in the reduced number of new retail developments across the</p>

borough. The AMR states that 'despite numerous permissions throughout the County Borough, economic circumstances have seen the desire for major retail floorspace wane in recent years. Accordingly, it is clear that the existing allocations and some of their associated permissions are no longer achievable within the current economic climate. Therefore, the broader retail need will require careful consideration during any LDP revisions procedure'.

With this in mind, it is clear there is a lack of demand for retail units and the new units are likely to remain vacant. Given the high vacancy rates, it is unlikely the retail units would be delivered on a speculative basis unless an operator was secured in advance of the building commencing, which has not happened in the plan period to date. Indeed, the site has secured a planning permission for retail units in 2019, however, there is still no interest for the retail units and, therefore, the planning permission has not been implemented.

The impact of providing new units on the existing town centre also needs to be considered in light of the increased vacancies in the town centre since the adoption of LDP. It is possible that the provision of new retail units could prevent the existing vacant units within the town centre being taken up. It was concluded in the Tonyrefail Town Centre Regeneration Strategy 2006 which was a background documents to the adopted LDP, that many units in Tonyrefail were of poor condition and design and that a number of buildings were redundant or under used. The provision of new, purpose built retail units at the site would likely be more favourable to prospective businesses in the area. Given the proposed units would not have site frontage along Mill Street or High Street they could detract footfall from main town centre streets which would adversely affects the town's overall vitality and viability.

The lack of take up of a prospective retail units on site is the most likely scenario and, therefore, it is unlikely the proposed allocation would be delivered during the life of this plan because there simply is not a demand for retail units in Tonyrefail. Should there be a surge in demand during the plan period, there are ample existing vacant units well placed in the town centre which could absorb the demand. This demonstrates that the town centre can still function despite there being no new retail floorspace being delivered at the application site. The lack of retail provision at the site does not undermine the retail offer in Tonyrefail or the overall aims of the LDP and will not result in any planning harm.

Housing Need

Notwithstanding the above discussion, the site has a dual allocation; for retail and housing. As discussed above under 'Principle of Development', the delivery of housing during the life the LDP has been considerably slower than anticipated and over 8000 homes are still required to be delivered during the plan period which ends in 2021. It is clear that there is a severe deficit in housing delivery.

In the case of this site, there are a number of issues hindering its delivery including significant level changes of approximately 10m across the site resulting in abnormal ground works costs, SAB requirements, low land values, the requirements for off site highway improvements and significant road infrastructure to gain access to the development area. Also, the developer wants to deliver over 38% affordable housing. These constraints directly affect the viability of the site and result in it not being possible to deliver the retail units as well as the housing allocation.

Given the severe deficit in housing delivery, it is considered imperative the site delivers maximum housing levels and that this outweighs the need for the site to deliver retail floor space, particularly since there are vacant units within the town centre which can soak up future retail demand.

It is understood through pre-application discussions that the LPA are likely to support the delivery of the housing allocation without the provision of retail floor space given the need to deliver housing.

	<p>The consideration of the planning application will require the balancing of all considerations. In this case, the delivery of housing allocations under policy SSA 10 is considered to far outweigh the delivery of the retail provision of policy SSA 15, for the reasons set out above.</p>
<p>Highways, Access and Parking</p>	<p>PPW10 requires development to be carried out in locations where there is sufficient transport infrastructure. It also requires sustainably located development which can successfully achieve a modal shift towards more sustainable travel options.</p> <p>Policy AW 5 requires development to have an acceptable impact on the highway network and provide sufficient parking. Policy AW5, together with Policy AW 6, requires development to provide accessible links to local centres to encourage sustainable modes of transport.</p> <p>Prior to discussing the wider highway impact of the proposal, the delivery of a highway link between Mill Street and High Street, via the application site will be discussed.</p> <p><u>Highway link between Mill Street and High Street</u></p> <p>Appendix 1 of the LDP provides further commentary to the LDP's allocations. In respect of the Policy SSA 15 retail allocation at the application site the text contained in Appendix 1 states, amongst other things, that 'Access would be from a new road linking High Street and Mill Street.' It is not considered the proposed link is a direct policy requirement since it is not included in the text of the policy but rather an aspiration.</p> <p>This link is not possible since the land required to deliver the link is in third party ownership. Notwithstanding ownership issues, there are also technical issues in terms of ground levels and the impact on potential ecological features.</p> <p>Notwithstanding the above, the link was required in order to provide a more convenient link between the retail offer at Mill Street and High Street, as suggested in the Tonyrefail Regeneration Strategy, 2006, and the proposed new retail floorspace required under policy SS1 15. The retail floor space is not being provided and, therefore, this link has a lesser importance in linking up the retail offer.</p> <p>It is acknowledged that a link would offer improved legibility for future occupiers to the town centre. The proposed development will, however, provide an improved pedestrian link to Mill Street which is considered reasonable given the scale of the development and would enable all future occupiers to easily access the town centre.</p> <p>Omitting a link between the application site and High Street is not considered to be a direct requirement of Policy SSA 15 and failure to provide it is not considered to be in conflict with LDP. It is understood the LPA have indicated at pre-application stage that excluding the proposed link is unlikely to result in an objection from officer's.</p> <p>Overall, whilst the link would be preferable the proposed links between the proposed development and Tonyrefail are high quality, convenient and safe and do not undermine the legibility of the site or its integration with the wider community.</p> <p><u>Traffic Generation</u></p> <p>The application is supported by a Transport Assessment which has indicated the proposed development will result in a modest increase in traffic, 29 trips in the morning peak and 19 trips afternoon peak. The Transport Assessment took account of the outline development, including the 42no. affordable dwellings proposed in Phase 1.</p>

	<p>The traffic increase is modest increase and unlikely to have a significant detrimental impact on the operation of the surrounding highway network.</p> <p><u>Proposed Access</u> The proposed access arrangement includes a mini roundabout which has been designed with the input of a Transport Engineer. The access is safe and appropriate in the context of the proposed development and local highway context and is designed to meet all current design standards. This access is proposed in relation to the outline application and Phase One application.</p> <p><u>Parking</u> In terms of parking, the proposals (both the outline application and Phase One application) will meet the Parking, Access and Circulation Supplementary Parking Guidance which requires one space per unit to a maximum of 3no. spaces per unit.</p> <p>The proposed development will not adversely affect highway safety and accords with PPW10 and Policies AW 5 and AW 6.</p>
Flood Risk	<p>National Policy in the form of Technical Advice Note 15 (TAN 15) relates to flooding and the proposed development must accord with the requirements of it in relation to the risk of flooding, specially section 7 and Appendix 1 of TAN 15. Policy AW2 of the Local Development Plan also requires development to be acceptable in regards to potential flood risk.</p> <p>The application site lies largely within Flood Zone A, with parts of the site access within Zone C2. Zone C2 is flood plain at risk of flooding with no flood defenses in place.</p> <p>The main area of the proposed residential development lies within Zone A with only the site access road and associated roundabout works within Zone C2. Transport and utilities infrastructure are considered to be areas of low vulnerability and, therefore, them being located in zone C2 is acceptable subject to management of emergency access routes and, if necessary, mitigation measures.</p> <p>The Flood Consequences Assessment which supports the application concludes that the flooding at the access point will flood to a maximum level of 0.2m. The TAN 15 tolerable levels of flooding on an access point is 0.6m. The proposed access is well within the acceptable levels of flooding and, therefore, does not represent an unacceptable flood risk and no mitigation measures are required.</p> <p>The proposed development complies with the strict requirements of TAN 15 in relation to flood risk. The proposal also accords with Policy AW2. The potential flood risk is well within tolerable limits and is acceptable in this regard.</p>
Good Design and Placemaking	<p>PPW10 requires a holistic approach to planning and design to ensure new development promotes people’s prosperity, health, happiness and well-being. Placemaking considers the context, function and relationship between a development site and its wider surroundings.</p> <p>Policies AW 5 and AW 6 require development to contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design.</p> <p>Good design and placemaking has been discussed at length in the Design and Access section of this Statement and to avoid repetition, it will not be discussed again. The proposed development accords with the placemaking principles of PPW10 and Policies AW 5 and AW 6.</p>

<p>Impact on Residential Amenity</p>	<p>PPW10 requires, as part of the wider placemaking principles, to ensure the amenity of existing properties are considered fully when proposing a new development and that harm is avoided.</p> <p>Policy AW 5 requires new development to have an acceptable impact on residential amenity.</p> <p>Phase 1 of the proposed development is over 21m away from the nearest dwelling and, therefore, will have no adverse impact in terms of overbearing or overlooking.</p> <p>In terms of future occupier amenity, in Phase One the proposed dwellings are all of a sufficient size with ample private amenity areas to ensure good quality housing for future occupiers.</p> <p>The layout in relation to the outline application is reserved and, therefore, residential amenity will be assessed at reserve matters stage. The illustrative masterplan, however, demonstrates that it is possible to achieve a layout which protects neighbouring and future occupiers.</p> <p>The proposed development meets the requirements of PPW10 and Policy AW5.</p>
<p>Ecological Considerations</p>	<p>The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty on public authorities which seeks to put nature at the heart of decision making in Wales. PPW 10 requires Planning Authorities to maintain and enhance biodiversity and ensure development does not cause any significant loss of biodiversity features and must secure a net gain.</p> <p>Policy AW 8 of the LDP requires development to maintain and enhance biodiversity unless the need of development outweighs the biodiversity value and the impacts of the development on biodiversity can be effectively mitigated and managed.</p> <p>The application is supported by an ecological survey which included further surveys for badgers, bats, dormouse, great crested newts, otter, water vole, reptiles and march fritillary butterfly.</p> <p>The survey identified that habitats on site comprised dense continuous scrub, semi-improved grassland, marshy grassland and ephemeral/short perennial and tall ruderal vegetation, alongside a belt of mature trees and areas of hardstanding/bare ground within the most northern field parcel, adjacent to the existing clubhouse (hereafter referred to as F1 which corresponds with its annotation in the Ecology Survey). The two field parcels (F2 and F3) immediately south of F1 support areas of marshy grassland and poor semi-improved grassland. The field immediately adjacent to the rear of the dwellings along Mill Street (F4) comprises a block of broadleaved woodland occupying the southern extent and the northern half comprising allotments, sheds and associated areas of bare ground, scattered scrub and ephemeral/short perennial vegetation.</p> <p>In terms of protected species, the following conclusion were drawn the the ecology report:</p> <p><u>Bats</u></p> <ul style="list-style-type: none"> • No bat roosts were confirmed within the site boundary; • 15no. trees were assessed as having potential to support roosting bats, include 3no. trees with high potential, 6no. with medium potential and 6no. with low potential; • Bats were detected as foraging and commuting across and within the application site. <p>A total 13no. trees will require removal. These works will not require a European Protected Species License but it is recommended that the trees are inspected prior to removal by a qualified person. If bats are found during works then an EPS license will be required. Other mitigation measures to protect bats include, amongst other things, soft felling methods. Retention of parts of the tree which have potential</p>

for bats are to be repositioned on site.

To protect foraging and commuting bats requires the retention and protection of the existing hedgerow network within the site and additional natural features, including landscaping, to be incorporated in the wider proposal. Also a sensitive lighting scheme will be required.

Breeding Birds

Breeding birds are likely to use the site. To protect breeding birds the retention of natural features should be secured, as discussed in relation to bats above. Where vegetation clearance is proposed it should be carried out outside of the bird nesting season.

Badger

Badgers are presumed absent from the site. As a precautionary measure, methods of working during the construction phase should be ecologically friendly to avoid harm to badgers during construction.

Otters

The unnamed watercourse situated along the northern boundary of the Application Site is to be fully retained and sufficiently offset from the proposed development footprint. Moreover, no evidence of otter resting places including holts and couches have been identified during surveys undertaken of this watercourse to date, such that a Development License from NRW is not required in respect of any drainage works anticipated to facilitate development.

Otter have been confirmed to utilise the watercourse as a commuting corridor and it will, therefore, be required to carry out an assessment for evidence of otter by a suitably qualified ecologist prior to works commencing. Also, reasonable avoidance measures during construction will be required including, but not limited to, the avoidance of construction works and storage of materials, machinery, plant or spoil within 7m of the banks of the watercourse during the pre-construction and construction phases of the development, alongside the implementation of a sensitive drainage strategy and sensitive lighting strategy.

Common Reptiles

A low population of common lizard and a medium/good population of slow-worm is supported by the Application Site, with a maximum of four common lizard individuals and 19 slow-worm individuals recorded during any one visit, predominantly in association with field F1 supporting scrub and grassland habitats.

A reptile mitigation strategy will therefore be required for the Application Site.

Dormouse

Dormouse were not found to be present on site during the surveys and, therefore, are not considered to pose a constraint to the development proposals.

Marsh Fritillary Butterfly

Specific to the Application Site however, given the absence of evidence of this species occurring within suitable habitats immediately adjacent to the Application Site, alongside the absence of its food plant occurring onsite, marsh fritillary butterfly are not considered likely to be supported by the Application Site.

In conclusion, the proposed development will result in the loss of approximately 3.68ha of the circa 5.17ha Application Site to proposed development, equating to c. 71% of the total Application Site area, such impacts are to be mitigated for through the sensitive design and layout of the proposed

	<p>development footprint. This includes, in summary, the following mitigation measures:</p> <ul style="list-style-type: none"> • Provision of green and blue infrastructure to incorporate new tree, shrub and grassland planting along the northern and north-eastern strengthening of habitat corridors across the Application Site to the wider landscape; and • The retention of the majority of hedgerows. <p>Biodiversity enhancements include the retention in its entirety of field F5 (to the south east) and those habitats supported therein are to be retained as an ecological mitigation area, to be subject to biodiversity enhancement through additional tree, shrub and grassland planting, in addition to the creation of reptile hibernacula and refugia alongside their sensitive management over the long-term.</p> <p>In addition to the above, precautionary construction methods will also be employed and can be secured via an Ecological Construction Management Plan and a sensitive lighting design which can be secure via planning condition.</p> <p>The proposed development has been informed by an extensive ecological survey which has ensured the scheme has been designed to incorporate and enhance the natural features of the site to protect biodiversity in perpetuity. The proposals accord with the requirements of PPW10, policy AW8 and the requirements of the Environment (Wales) Act 2016 and are acceptable in this regard.</p>
Trees	<p>PPW10 and Policy AW 8 requires development to have an acceptable impact on natural features (these policies expanded on earlier in this statement).</p> <p>The application will result in the loss of some trees to accommodate the proposed development. An Arboricultural Impact Assessment has been submitted to demonstrate the extent of tree loss in respect of Phase 1. The extent of tree loss is unknown at this stage in relation to the wider outline application but will be kept to the minimum required to facilitate development.</p> <p>Whilst the loss of trees is regrettable, the majority of trees to be lost are category C or U which do not represent a constraint to development.</p> <p>The tree to be removed will be compensated through replacement planting through landscaping of the development and within the ecological mitigation area to the south east of the site.</p> <p>In light of the limited value of the trees to be lost together with the compensational planting, the proposed development is considered to be acceptable in accordance with PPW10 and Policy AW8.</p>
Planning Obligations	<p>The applicant is aware of the requirement for affordable housing, at 20% of the whole development, and is willing to enter into a Section 106 to secure this contribution in accordance with Policy SSA 10.</p> <p>The applicant is also aware of the Community Infrastructure Levy requirements associated with the development.</p>
Sustainable Drainage	<p>The proposed development has been developed in consideration of the Sustainable Drainage requirements and a SAB application will be submitted in due course. The applicant is confident that SAB approval can be obtained based on the proposals submitted in relation to the outline application and the application for Phase 1.</p>

Conclusion

The proposed development represents the delivery of an allocated housing site in a highly sustainable location. This ensures the relevant elements of PPW and the LDP are accorded with and weigh heavily in favour of the site's residential development.

The scheme has been developed with careful consideration for technical considerations, including ecology, topography constraints, design and amenity and highway impact. The proposed layout has also been developed following pre-application discussions with Rhondda Cynon Taff County Borough Council Planning Department.

It is suggested, complies with relevant national and local planning policy in all regards and it is, therefore, respectfully concluded that the application should be supported.