

WEPco & Rhondda Cynon Taf
County Borough Council

**MIMWEP - Llanilltud Faerdref
Primary School**

Planning Statement

RH0301-ARP-XX-XX-RP-T-00001

Final Draft for PAC | 21 Oct 2021

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1 Introduction

1.1 Overview

This Planning Statement has been prepared by Ove Arup and Partners Ltd. (Arup) and accompanies a full planning application for the redevelopment of Llanilltud Faerdref Primary School, located to the east of St Iltyds Road, just off the B4595 which provides the main route through Church Village, hereafter referred to as 'the site'. The application is submitted to Rhondda Cynon Taf County Borough Council (RCT) as Local Planning Authority (LPA) on behalf of WEPCo Ltd. and RCT Education Department as joint Applicant.

The site comprises the grounds of Llanilltud Faerdref Primary School including a main school building, sports hall building, two temporary buildings comprising four classrooms, hard standing, road access/egresses, three Multi Use Games Areas (MUGAs) and ancillary grass playing fields and sports pitches. The existing high school was constructed in 1974.

This Statement describes the need for development, the site context, full details of the proposed development and assesses this against relevant the planning policy and material considerations in order to justify the grant of planning permission.

This Statement is structured as follows:

- Chapter 1 provides the introduction and overview of the application;
- Chapter 2 describes the site location, relevant designations and site context;
- Chapter 3 details the pre-application process undertaken for the site;
- Chapter 4 provides a detailed description of the proposed development;
- Chapter 5 outlines the relevant planning policy context;
- Chapter 6 provides the planning assessment within the context of relevant planning policies and material planning considerations; and
- Chapter 7 summarises the Statement and justifies the grant of planning permission.

1.2 Summary of Proposed Development

The application seeks full planning permission for the demolition of existing school buildings on the Llanilltud Faerdref Primary School site to provide a single storey school building, to include classrooms for primary and nursery pupils.

In summary, the planning application seeks consent for the following proposed works:

- Demolition of the existing school buildings;
- Construction of a new single storey school building, to include classrooms for primary and nursery pupils, "heartspaces", administrative spaces, main hall and kitchen;

- External areas and facilities, to include landscaped areas, an amphitheatre and hard and soft playgrounds;
- 2no. MUGAs courts;
- 1no. car parking area with capacity for 23no. car parking spaces and 10% electric vehicle charging provision;
- 32no. cycle parking spaces / storage units;
- Refuse and waste collection;
- Landscaping; and
- Sustainable Urban Drainage Systems (SUDs).

A proposed site layout for the development is shown on the Proposed Site Plan, enclosed with this planning application.

1.3 The Applicant

WEPCo Ltd. and RCT Education Department are the joint Applicant for the planning application. RCT are the landowner and service provider; and WEPCo is a Joint Venture between Meridiam Investments II SAS and the Development Bank of Wales on behalf of Welsh Ministers. Arup together with Lead Designers Sheppard Robson Architects, have been appointed by the joint Applicant to lead a multi-disciplinary team to develop and submit proposals for the proposed redevelopment of the Llanilltud Faerdref Primary School.

1.4 Need for Development

Llanilltud Faerdref Primary School is situated on a level site and consists of two blocks and one demountable classroom. Block 1 is a single storey Consortium of Local Authorities Special Programme (CLASP) building, constructed in the early 1970s. Block 2 is a modern extension built with traditional methods in the 1980s. The presence of asbestos restricts maintenance and redevelopment of the existing buildings and as a result they are becoming unfit for purpose.

The existing school is within an area of rapid housing development and requires investment in order to become fully accessible and brought up to a 21st Century Schools' standard. As outlined above, the existing school has CLASP buildings on site, which have issues with access and have come to the end of their useful life.

The proposed development would deliver space for 270 students aged 3-11 (240 students aged 5-11, plus 30 FTE nursery places).

The proposed development would also support improved opportunities for learning by:

- Improving sports facilities and providing purpose-built specialist educational areas;

- Ensuring that relevant education provision is delivered in such a way that it meets the broad well-being needs of young people, parents/carers and communities; and
- Making the learning environment fit for purpose.

It is the Applicant's ambition that the proposed development would be delivered in time for the target opening date of September 2023.

2 The Site

2.1 Site Location

The application site for the proposed development comprises the grounds of Llanilltud Faerdref Primary School, which is located to the east of St. Iltyds Road, just off the B4595 which provides the main route through Church Village.

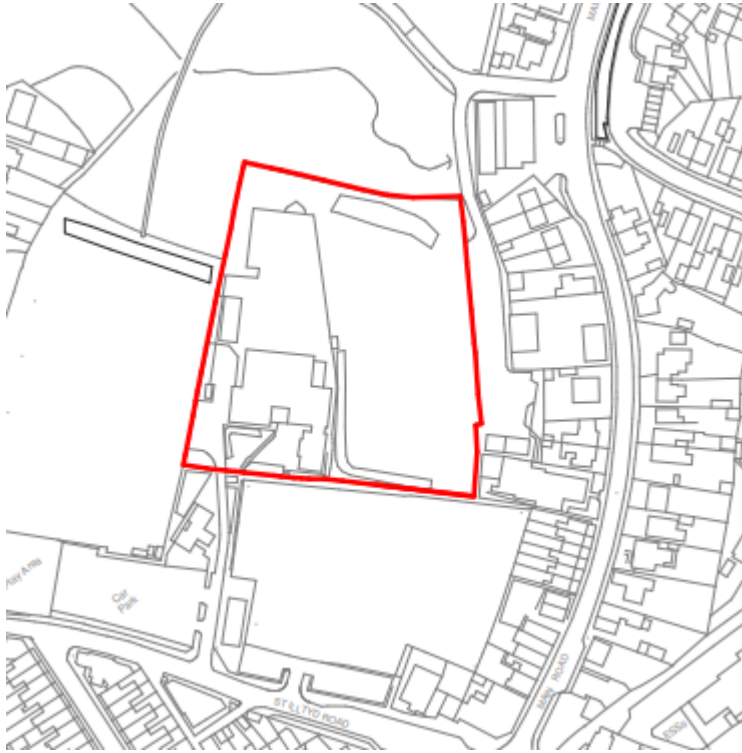
The site location is shown on the Site Location Plan submitted in support of this planning application and in Figure 1 below. The application site equates to approximately 12,200sqm in area, and is located within the settlement boundary of Church Village. The site is not allocated for any particular land use within the Rhondda Cynon Taf Local Development Plan up to 2021 (LDP).

The site is surrounded by residential development to the north-west, south-west and south-east and playing fields (Central Park) to the north-east.

The current land use is the Llanilltud Faerdref Primary School and its grounds, including a main school building, sports hall building, two temporary buildings comprising four classrooms, hard standing, road access/egresses, three MUGAs and ancillary grass playing fields and sports pitches. The existing high school was constructed in 1974.

The site is gently sloping with some steeper embankments in places. There is an overall level change of approximately 6m. The highest part of the site is around +106.6 m AOD on the western boundary near the main entrance and the lowest part of the site is around 101m AOD at the eastern boundary of the site where the land falls away toward the Semi Ancient Natural Woodland.

Figure 1 Site Location Plan



2.2 Site Context

2.2.1 Access

Vehicular and pedestrian access to the site is gained off St Iltyds Road to the west. Pedestrian access to the site is currently also provided between the school and a car park located to the south-east of the site situated to the rear of the Parish Hall. The path then runs between the existing Multi Use Games Area (MUGA) and the existing school playing field.

The nearest bus stop to the site is located on the highway on the western side of St Iltyds Road, situated directly adjacent to the site. This is served by the Number 90 bus route that runs between Gwaunmiskin and Pontypridd Bus Station three times a day (Monday to Saturday).

2.2.2 Designations

The site is not located within any statutory environmental or historic landscape designations. There are also no designated heritage assets within the site boundary.

Within the wider surroundings, the following features are considered of relevance:

- One international statutory designation was identified within 10km of the Site; Cardiff Beech Woods SAC (c. 4.3km south of the Site);
- No national or local statutory designations were identified within 3km of the Site;
- Grade II Listed Parish Hall to the south;
- Nant Yr Aran an Ancient Semi Natural Woodland to the east; and
- Residential development to the north and west and Llantwit Fardre Sports Club to the east.

2.2.3 Surrounding Land Uses

As outlined in the Site Location Plan above, the site is surrounded by several land uses including residential development and recreational facilities. The site is bound to the southeast by the schools playing field which adjoins a Parish Hall car park. To the northeast of the site is a dense area of woodland part of the Church Village Central Park.

To the north west, there are some recreational playing pitches which includes an adjoining children's park and car park. To the east of the site is the two storey Canolfan Ieuenctid Garth Olwg Youth Centre. Further east, there is St Iltyds Road with predominantly residential properties along the opposite side of this road. Along the west side of St Iltyds Road includes retail and food and drink establishments (A1 and A3 Use Classes) in addition to an Optician and a hairdressers (A1 Use Class).

To the south west of the site is a Community Centre which adjoins a MUGA with some associated car parking. Further south is a local centre high street on the junction of St. Illtyds Road, Main Road and Station Road. The centre includes retail, food and drink, professional services amongst some other uses (A1, A2, A3 and D1 Use Class).

The site is located within the settlement boundary of Church Village. The site is not allocated for any particular land use within the Southern Strategy Area of the Rhondda Cynon Taf Local Development Plan up to 2021 (LDP).

2.2.4 Ecology and Landscape

There are no statutory local, national or international landscape or ecology designations on or immediately adjacent to the site.

The nearest statutory designated ecological site is the Site of Importance for Nature Conservation (SINC) Duffryn Dowlais.

The application site is predominantly characterised by existing school buildings, hard surfacing and amenity grassland. The site is located adjacent to an Ancient Semi Natural Woodland named Nant Yr Araian (ID no. 1186) which forms the entire north-eastern boundary of the site, along with scattered mature trees and short sections of native hedgerow on the site. No trees on or adjacent to the site are listed on the Ancient Tree Inventory.

A Preliminary Environmental Assessment (PEA) was undertaken for the site in 2019 and Phase 2 Ecological Surveys in April 2021. Further surveys for bats and Great Crested Newts (GCN) were recommended and opportunities for ecological enhancement identified, with the full findings detailed in the PEA.

It was recommended that a Habitat Suitability Index (HSI) assessment of the on-site pond be undertaken, to confirm the presence of Great Crested Newts (GCN). A HSI assessment was completed for the onsite pond which found it to be of 'Average' suitability for GCN.

Further eDNA analysis of water samples collected from the ponds was undertaken in May 2021, whereby findings were negative for GCN presence.

Phase 2 surveys also included bat surveys; a Preliminary Roost Assessment of the three buildings was undertaken of external features only. The assessment found the buildings are considered to offer some limited potential for bats.

On the basis of the findings, bat roost surveys were undertaken in June 2021 and found bat roost potential within a single building B1 on the Llanilltud Faerdref school site. The surveys did not identify any roosting activity within building B1. While it is noted that infrequent roosting behaviour can be difficult to identify, given the low level of wider activity, it is considered unlikely that the building is used for roosting purposes.

The Arboricultural Report prepared in May 2021 confirmed the presence of a total of 12no. trees and 10no. groups of trees on site, this includes Category A, B and C trees. The key Arboricultural features are found to the north of the site; G3, which is on adjoining land providing an interesting visual amenity. Other prominent

trees across the site are T1, T2 and G2. The key Arboricultural constraint to consider is G3, an ancient semi-natural woodland (SNW) on the adjacent site, a 15-metre buffer zone should be applied around this woodland in accordance with standing advice from the Forestry Commission. In addition to this, the pine, T1 and the oak T2 along with G2 and G3 should be retained.

2.2.5 Cultural Heritage and Archaeology

The application site does not contain any statutory heritage designations or heritage assets including listed buildings.

The Grade II Listed Parish Hall located off the Main Road / A473 is directly adjacent to one of the school's playing fields and the existing pedestrian access.

2.2.6 Ground Conditions

In terms of general topography, there is a gradual fall in terrain from west to east, with elevation ranging from approximately 47.7mOD in the west down to between 45.5m-46.5m OD along the eastern boundary.

A Phase I Geo-Environmental Desk Study Report and Phase II Geo-Environmental Assessment have been undertaken for the site and both have been submitted in support of the planning application.

The Preliminary Quantitative Risk Assessment indicated that the risks posed by the identified contamination pathways were Very Low to Moderate / Low.

The site is located in a Coal Authority High Risk Development Area. A Coal Mining Risk Assessment (CMRA) was undertaken in March 2019, updated in June 2021 for the application site. The assessment concluded that no voids, loss of flush or indication of worked seams were recorded within any of the exploratory locations, indicating further investigation or treatment works should not be required prior to the re-development of the site based on the Coal Authority records and the ground investigation.

A Phase I Geo-Environmental Desk Study Report was undertaken for the site in 2021. Key findings from the Phase I Geo-Environmental Desk Study indicate that:

- The natural deposits are considered suitable for shallow spread foundations (strip or pad) within the underlying firm to stiff clays of the Diamicton Till or Upper Coal Measures at minimum depths of 0.75m bgl. HSP would recommend that an ABP of 225kN/m² could be utilised for design of traditional foundations. Foundations should be deepened within the location of WS05 and WS06 through any reworked materials.
- The screening process for on-site human health receptors show that the generic assessment criteria GACs for a residential without home grown produce setting were not exceeded. The concentrations of potential contaminants recorded at the site indicates an acceptably low risk and therefore mitigation measures are not required as part of the development.

- The gas monitoring to date indicates that the site generally falls into a Characteristic Situation 1 and therefore ground gas protection measures are unlikely to be required as part of the development.
- The results of sulphate and pH testing carried out on selected soil samples taken during this investigation indicate it is appropriate to adopt a basic Design Sulphate Class of DS-1 together with an Aggressive Chemical Environment for Concrete (ACEC) of AC-1s.
- Based on the chemical analysis report it is considered that specialist materials are unlikely to be required for water supply pipes at the site due to the low levels of contaminants recorded. However, confirmation of supply pipes should be sought from utility providers.

Based on the above, the environmental sensitivity of the site can be considered to be 'Low' at this stage

2.2.7 Hydrology

The Welsh Government Technical Advice Note (TAN15) and Natural Resources Wales (NRW) flood maps¹ show that the site is located within Flood Zone A, an area with a low probability of conjectural tidal/fluvial flooding.

As the Llanilltud Faerdref site is in zone A and on the basis of the recently revised TAN15, a Flood Consequence Assessment to cover surface water flooding has been submitted in support of the planning application.

Within the site boundary, surface flooding is identified west of the existing school building. The surface water flooding identified north of the site boundary is associated with the Nant yr Aran watercourse. This encroaches slightly onto the site and on to the existing grassed playing fields.

2.2.8 Foul Drainage

Public sewer records indicate there are no Dwr Cymru Welsh Water (DCWW) assets adjacent to the site. There is a 225mm diameter combined network located in St Iltyd Road to the south of the site.

The 3D levels of the site imply that the level of St Iltyd road is higher than the site levels. There is a 375mm diameter concrete pipe north of the site that runs along the Llantwit Fardre Sports Club access road. Just downstream of the access road, a 150mm diameter network joins and downstream further a 525mm diameter joins. This network then enters a CSO which is assumed to overtop into Nant yr Afan. A 225mm diameter network then continues from the CSO.

The Llanilltud Faerdref existing school building has multiple foul drainage outlets from the building that are collected into a private combined sewer network around the building perimeter. This network then runs north across the existing playing fields. The non-intrusive survey was terminated at the site extents and therefore

¹ NRW Development Advice Maps; River and Sea Flooding Maps; and Surface Water Flooding Map.

the outfall location of this combined network is unknown however it is assumed that this outfalls into the Nant yr Aran watercourse north of the site and this will be confirmed through a further outfall survey.

2.2.9 Storm Water Drainage

The existing Llanilltud Faerdref site generally falls from south west to north east towards the existing water course Nant yr Aran. This forms one single large catchment however the water is conveyed to the watercourse through different methods and forms 2 sub catchments.

2.2.10 Rainfall Run-Off Catchments

Hydrological analysis was undertaken for the site to determine the site's Greenfield Runoff Rate (GRR). The Institute of Hydrology 124 (IoH124) method was used to calculate the GRR for the 1:1, 1:30 and 1:100-year rainfall events. These values are used to inform the proposed drainage design, where Climate Change will also be considered.

The 1:1 year return period event would have a Greenfield Runoff Rate (1/sec/ha) of 6.7. The 1:30 year event would be 13.5 1/sec/ha, the 1:100 year event would be 16.7 1/sec/ha and the Obar would be 7.7 1/sec/ha.

The site has been developed previously as it is currently a school. Investigations conclude that the current site has a two piped drainage networks (combined and storm) that both outfall at an uncontrolled rate into the Nant yr Aran at Outfalls 1 and 2. Therefore, the pre-developed impermeable sections of site can be considered brownfield sites which will be used to inform the discharge rates from the proposed impermeable areas of the site.

The existing network, based on the topographical and utility survey, was modelled using Microdrainage software and the 1-year runoff rate for each catchment.

2.2.11 Utilities

There are numerous existing utilities located on site and a non-intrusive survey has been undertaken to identify all assets within the site red line boundary. Drawing number reference RH0301-ARP-ZZ-00-DR-C-00021 submitted with the planning application, shows the existing utilities located within the site.

Incoming services are concentrated at the entrance to the west. Electrical and gas pipe services entering the site from the south-west were not found, there is an unknown trace which could be gas but this does not match the asset plans. Also, surveys were unable to find a gas or water feed to a building to the north of the site.

2.3 Planning History

The planning history for the site is set out in Table 1 below.

Table 1: Planning History for the application site

Ref. No	Status	Description of proposal	Application type	Decision issued date	Decision
99/2322/08	Decision Issued	Erection of 9m x 7.2m cabin to provide accommodation.	Planning Application	24/05/1999	Approved
00/2430/08	Decision Issued	Installation of a double mobile classroom, terrapin structure.	Planning Application	05/07/2000	Approved
08/0945/08	Decision Issued	Providing an outdoor canopy adjacent to the main building.	Planning Application	24/07/2008	Approved
08/1630/01	Decision Issued	Eco flag on flag pole.	Planning Application	26/11/2008	Approved

3 Pre-application Consultation

3.1 The Pre-application Process

From the outset, a collaborative approach has been adopted for the pre-application process, engaging with both key stakeholders and the local community, as set out below.

3.1.1 RCT and Technical Consultees

Planning

Early pre-application discussions with the RCT Planning Department were held to introduce the proposed developments, discuss the consenting strategy and agree the planning application validation list for the planning application.

The Environmental Impact Assessment (EIA) status of the proposed development has also been considered. In accordance with the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (EIA Regulations), the development has been assessed against the Schedule 2 thresholds for Urban Development Projects (Category 10(b)). Due to the scale of the proposed development and its location outside a 'sensitive area', it has been concluded that the proposals do not need to be formally screened by the LPA and would not constitute EIA development. Our assessment of the proposal against the EIA Regulations has also been presented and discussed with the Planning Department who has agreed that an EIA Screening Request is not required.

Highways

Correspondence with RCT Highways Development Control, Traffic and Adoption Services Officer was received on the 19 May 2021, where the following matters were confirmed:

- Full scoping exercise with RCTCBC acceptable subject to consideration/inclusion of information below.
- For the accident analysis, free sourced information such as Crashmap is not acceptable - Data should be obtained direct from the Welsh Government for the most recent 5 year period available.
- Traffic Assessment, rates/generation/distribution/comment on impact. As existing most trips would already be on the network.
- For parking provision requirements and input into indicative parking layout. Parking should be in accordance with RCT SPG Access Circulation & Parking (March 2011).
- Primary walking routes to the school from within the catchment to be identified, described and assessed in terms of distance and availability as set out in Leaner Travel Guidance 2014 - available on WG website. Any issues affecting availability of a route should be identified with details of mitigation

measures required and details of any constraints affecting delivery of such measures and if necessary alternative routes compliant with walking distance criteria, identified.

- Initial Travel survey of existing school for baseline would be useful in quantifying the parking demand at school drop-off/pick up.
- Survey of surrounding parking stock, study area submitted acceptable in principle.
- The Council is fully supportive of the Construction Logistics and Community Safety (CLOCS) initiative and is keen to encourage and support the scheme.
- Focus should be on measures to accommodate on-site parking for staff and measures to mitigate the impact on adjacent areas during the drop off and pick up periods.
- Any forthcoming TS / planning application should include consideration of the following:-

i. Number of staff, pupils and ancillary staff for existing and proposed, times of operation, provision of pre-school/or afterschool activities eg breakfast club, afterschool club, afterschool activities etc., details of any community use.

ii. Assessment of routes to and from school in accordance with Safer Routes in Communities / Learner Travel Active Travel etc. Where issues are identified details of mitigation measures should be included within the report.

iii. Council Policy is not to provide home to school transport for primary school children, however, proposals should anticipate and include means of accommodating buses/ coaches to cater for school trips, swimming lessons, sports etc.

iv. Consideration must be given to school drop-off/ pick-up by parents etc, in terms of parking demand surveys and consideration of any improvements/facilities that can be provided to accommodate and reduce the impact on the adjacent network.

v. A significant amount of data can be gathered at little or no cost by means of class projects integrated within the curriculum e.g. surveys and graphs of how pupils travel to school.

vi. Parking within the school site to be in accordance with SPG Access Circulation and Parking (March 2011). As RCT Schemes the proposals should provide robust parking and cycle parking provision.

vii. Any secondary accesses for maintenance.

viii. Swept paths must be provided for catering and waste vehicles.

SUDs Approving Body

Pre-Application Strategy Review Report was received from the Sustainable Drainage Approval Body in August 2021 where the following matters were raised:

- Regarding Surface Water Runoff Destination, the proposed design does not include sufficient information to ascertain compliance with Standard S1. A likely compliance with Standard S1 can be achieved through the inclusion of detailed whole site SUDs Drainage Design Proposals, detailed Geotechnical factual, and interpretive report and unstable and Contaminated Land Reports.
- In regard to Surface Water Runoff Hydraulic Control, the proposed design requires the following information to confirm compliance; an engineering layout which includes levels, gradients, locality and storage is required. Furthermore, detailed hydraulic calculations will be required to demonstrate the hydraulic suitability of the proposed drainage system. The hydraulic calculations will have to demonstrate that the proposed drainage system can accommodate the Q100 plus climate change event, whilst successfully restricting runoff to the proposed rates. This will need to be accompanied by a contributing area plan that will depict the contributing areas inputted into the hydraulic calculations at each manhole. Detailed cross sections and construction drawings will be required to demonstrate suitable design.
- The proposed design for Water Quality still requires water quality treatment and pollution prevention strategy and Plan in addition to Contaminated Land Report to ascertain compliance.
- An amenity Plan, Landscape Plan and Landscape Layout drawings were submitted with the pre-application advice. This was considered to demonstrate a likely compliance for the amenity standard.
- To satisfy the Biodiversity standard, further information required is a Biodiversity Plan, Landscape Plan and Landscape Layout drawings.
- To confirm compliance with the Design of Drainage for Construction, Maintenance and Structural Integrity standard, the following information is still required. Construction details, Construction Management Plan, Construction Phasing Plan, Information and communications plan, Detailed SUDs Assets Maintenance Plan, Specialist drawings and General engineering layout coloured drawings.

3.1.2 Pre-Application Consultation (PAC)

The scale of the proposed development also means that it must comply with the Pre-Application Consultation requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Consequently, and in accordance with the regulations, stakeholders and the public will be able to view and comment on the draft planning application documentation and plans in advance of formal submission.

The PAC period will run between 25 October and 24 November 2021 and the full planning application, including drawings and plans will be available for viewing online on the WEPCo Ltd website <https://wepco.cymru/projects/llanilltud-faerdref>

Full details of the pre-application consultation activities undertaken will be presented in the Pre-application Consultation Report which will be submitted in support of the planning application.

4 Proposed Development

4.1 Full Planning Application

The planning application seeks full planning permission for the proposed re-development of the Llanilltud Faerdref Primary School to create a new Net Zero Carbon in operation educational facility.

The proposed primary school would accommodate 270 students aged 3-11 (240 students aged 5-11, plus 30 FTE nursery places); and would have capacity for 21 teaching staff plus 18 non-teaching staff.

Development proposals are outlined below, further design details are also found within the Design and Access Statement submitted in support of the planning application.

The proposed layout for the development is shown on the landscape masterplan, enclosed with the planning application and in Figure 2 below.

Figure 2 Landscape Illustrative Masterplan



4.2 Development Proposals

4.2.1 School Building

The proposed school building would be single storey in height and comprise gross internal floor area of 12,200sqm.

The new school building would be located at the south-west corner of the site, located broadly in the location of the existing grass field. The location and massing are considered to be the most appropriate from the conclusions of the site analysis. The site will comprise a Nursery and Primary school. The intention is to maximise the opportunity the site presents for outdoor learning, play and exercise.

The proposed layout of the building has been devised based on a logical and methodical approach to understand the educational needs of the school, in a way that has also ensured that the building form is legible. An L-shape option is proposed with the heart space positioned at the centre of the building (adjacent to the junior cluster of classrooms). The teaching 'wings' are also located perpendicular and open at the ends for access, natural light and views out. The 'wings' are organised to allow for a graduation of age groups, as pupils 'snake' around the building.

The north facing main entrance located southeast of the proposed car park would bring together routes from across the site following pedestrian desire lines from site entries, coach and drop off points. At the main entrance, visitors and parents would enter via a secure lobby.

The 'heart spaces' would be centrally located for ease of access. The main hall and kitchen located in the southern wing are zoned so that rooms can be easily accessed during the day outside of the core day.

The nursery and early years classrooms located in the northwestern wing would have free flow to external play area from classrooms. The junior classrooms located in the eastern wing of building would have a separate route for pedestrian access to the play areas for older pupils allowing for classroom pick up / drop off at end and start of school day that does not cross the play space for nursery or reception.

The layout of the proposed development is as shown on the indicative general arrangement plan in Figure 3. The scale and massing of the proposed development are illustrated in Figure 4, Figure 5 and within the Design and Access Statement. Sections of the proposed development are set out in Figure 6, Figure 7 and Figure 8.

Proposed materials for the building fabric are detailed on the Elevations Plans submitted with the planning application. Materials include facing brickwork for the façade, standing seam for the roof and PCC aluminium and glazing for windows and doors. It is expected that specific material details would be confirmed via condition. Further details on the design principles of the proposed development are provided within the Design and Access Statement.

Figure 3 General Arrangement Ground Floor Plan



Figure 4 Proposed Massing from South West Elevation



Figure 5 Proposed Massing from South West Elevation



4.2.2 Sports and Recreational Facilities

The sports facilities for the school are shown on the Landscape Illustrative Masterplan on Figure 2, which is also submitted in support of the planning application.

The sports provision would be located to the north and west of the school buildings and would comprise playing fields and 2no. MUGA courts. The MUGA will be fully fenced with direct access to the hard play.

A net loss of approximately 1,165.71sqm of playing fields is proposed due to the siting of the new school building on existing playing fields within the south of the site. The existing playing fields are in poor condition, becoming water logged given the existing drainage on site.

The proposals would also compensate this loss through the provision of new and enhanced sports facilities. In addition to the 2,345.84sqm of playing fields, the 2no MUGAs would provide an additional 1,369sqm of formal sports pitch area, thereby partially offsetting the loss of existing playing fields within the south of the site.

MUGAs

The MUGAs located in the northwest corner of the site would be 18.5 x 37m and have been designed to accommodate a variety of sports including football, basketball and tennis. Fencing for the MUGAs would be 3 metres in height and would comprise weldmesh, as indicated on the Fencing and Security Strategy, submitted with the planning application. The proposed MUGA will not include any external lighting.

Other play spaces

The school external play areas consist of a mix of hard and soft areas outside of the classrooms, comprising approximately 4,431sqm of total space. The proposed surface is primarily macadam with line markings.

Grass areas and tree planting are proposed to define the soft play spaces throughout the site.

The school's external hard play consists of 1,075sqm macadam surface with access to the wider soft areas and pitches.

The school would have access to an amphitheatre space with ... height seating walls and grass banks between. This would be located north of the school building.

There would be a potential Trim Trail Area close to the Amphitheatre, north of the school building within the playing field.

4.2.3 Community Use

WEPCo recognises the importance of placemaking and is committed to strengthening the connection between people and the places they share. At the heart of the WEPCo investment programme, through which the proposed development would be delivered, is a commitment to responsible investment that delivers impact for now and for future generations.

The Wellbeing for Future Generations Act and the UN Sustainable Development Goals (SDGs) are central to the Applicant's strategy and projects. WEPCo have ambitious plans for a Social Value programme that supports Wales and Rhondda Cynon Taf's Social, Economic, Environmental & Cultural priorities.

As part of this social value and community benefit aims, the proposed development would accommodate a community use aspect. The schools Heart spaces, hall, junior room and the sport pitches would be available for community use by the general public outside of the operational hours of the school. Proposed

hours of use for the development include: 08:00-20:00 Monday to Fridays; and 08:00-13:00 on Saturdays.



Figure 6 Proposed Heart Spaces



Figure 7 Proposed Circulation and Classroom Sections



Figure 8 Proposed Elevations

4.2.4 Access and Movement

The site layout places emphasis on pedestrians and cycles and to ensure the approach to the building from the site access points would not be dominated by vehicles and a pedestrian plaza space is created at the main entrance.

The proposed access and circulation strategy for the development is as set out in the Access and Circulation Plan, submitted with the planning application. This plan details the proposed arrival and departure circulation, proposed access during the day and out of hours use by the community and visitors, alongside emergency access.

Pedestrian and Cycle Access

Pedestrian and cycle access would be retained via the existing PRow which is accessed from Main Road and runs along the western side of the Parish Hall. This would lead into a widened access point on the western extent of the proposed site.

Access to the classrooms would be through the entrance lobby located on the northwest side of the main school building. This entrance would also be used at the start and end of the day by parents as the main access for pupils.

Vehicular Access and Parking

The vehicular access point would be as per existing via St Illtyds Road via a priority T-junction arrangement. As part of the proposed development, the access would be extended into a redesigned car park, comprising a total of 23no. parking spaces. There will be 2no. spaces which will be disabled spaces conveniently

situated near the school entrance, 1no. commercial vehicle space and 3no. visitor spaces.

The existing secondary vehicular access from Main Road leading into the Parish Hall would no longer be utilised as an access for the school.

Electric vehicle charging would be provided at a rate of 10% active charging which accords with Welsh Government guidance. The remainder of spaces (90%) would be provided with passive charging with the ability to be converted in the future.

Cycle Parking

Cycle parking for the new school would be conveniently located directly adjacent to the proposed new pedestrian/cycle access. This is away from vehicular traffic and therefore conflict between cyclists and motorised vehicles would be minimised to ensure safe access for pupils, parents and staff.

The adopted RCTCBC Parking Standards outlines that 21no. cycle spaces are required, based on the forecast number of pupils and staff. However, to promote cycling as a transport mode for staff and pupils and cater for future demand, it is proposed to provide 16no. covered Sheffield style stands as part of the development, providing storage for up to 32no. cycles. Associated facilities would also be located within the school itself including changing rooms, whilst a shower is also to be provided within a hygiene room for use by staff if required.

It should also be noted that further expansion of cycling facilities could also be introduced should it be warranted by demand.

Servicing and Delivery

A dedicated service and delivery yard plus bin store would also be located at the north of the car park for ease of access by bin lorries, and an additional external bins store would be provided near the kitchens. Waste can be ported from this location to the car park bin store.

4.2.5 Sustainability

A key design principle driving the proposed development includes efficiency and net zero carbon measures. The proposed design would be net zero carbon in operation. This would be achieved through the selected materials and methods of construction, approach to efficient and lean design, and designing for construction and re-use to achieve a more sustainable design and to reduce embodied and whole life carbon. A BRE AAM 'Excellent' rating under the 2018 Education assessment would be sought through the proposed development.

A Building Management System (BMS) would control and monitor the school's ventilation, heating, cooling and electrical systems.

An automated Energy Metering System would be utilised to collect and manage energy usage data from the proposed school building. The system would interface

with the BMS system to collect incoming utilities data, sub-metered data (including heating, lighting and cooling energy); and other feedback data including internal room temperatures and CO2 levels.

Passive design of daylighting has been prioritised initially to reduce the requirement for artificial lighting and reduce energy consumption. This has been a result of climate-based daylight modelling, using the Useful Daylight Index metric.

The proposed new building structures would also be designed for safe deconstruction at the end of design life, with layer independence (i.e., non-structural elements may be replaced without impacting the principal structural frame, or overall structural integrity). The design considers future adaptability and potential expansion.

Together, proposals would make a strong contribution towards Welsh Government commitments to achieving net zero by 2050. Further details of how the proposed development would exceed policy requirements and Welsh Government sustainability targets is set out in Section 6.3.3.

4.2.6 Security

The proposed development would maintain a secure building line and include strictly zoned areas to ensure controlled access for parents and appropriate levels of public access for the proposed development's community use outside of school operating hours.

In order to maintain appropriate levels of security at the site, perimeter security fencing (2.4m in height) would be erected along the site boundaries to meet Secured by Design (SBD) standards and specifications. Internal security fencing (1.8m in height) would be erected around the site's external play spaces to separate the secure and non-secure area (main entrance and car parking).

External elevations of the school buildings, main entrances, public circulation areas, vehicle parking areas, bike and bin stores, and the pupil play areas would be protected by CCTV.

4.2.7 Landscape and Biodiversity

The proposed design of the external spaces is indicated on the Landscape Illustrative Masterplan, submitted with the planning application (also included at Figure 2).

The proposed development would transform the current school site to create a new school building and ancillary spaces that would be set within the landscape. The layout of the proposed development would be different to the existing school layout, with the main school building proposed within the south of the site whilst retaining the existing entrance approach. The design would enable the development to satisfy the car parking requirements for the new school, while ensuring that soft landscaping and vegetation provides a visual break to minimise any potential impacts.

On adjoining land to the north of the site, there is designated ancient semi-natural woodland (ASNW) which provides visual amenity and local wildlife habitat. In line with standing advice from the Forestry Commission, a buffer zone to the ASNW will be implemented to avoid root damage.

Existing habitat to the north of the site is to be retained as shown on the Planting Strategy drawing 'RH0301-ALA-00-XX-DR-L-00013'. However, to facilitate the proposal, 2 individual trees, 2 groups features and the parts of 2 group features would need to be removed (as shown on the Planting Strategy). The removals are of low quality (category C, which should not constrain a development) or moderate quality (category B) trees and can be mitigated for with replacement planting.

All category A trees are proposed for retention at the site. Replacement trees and additional tree planting is proposed across the site, to the sum of 30no. trees.

Amenity grass, bio-diverse grass area, Rain Gardens, Woodland Enhancement Planting (North of the site) and hedges are proposed across the site around the main school building in accordance with the Planting Strategy, which is submitted with the planning application.

4.2.8 Drainage

The Drainage Strategy submitted with the planning application details in full the initial SAB Consultation and correspondence with Welsh Water at pre-application stage.

The approach to underground drainage is addressed in conjunction with the approach to site-wide utilities, SUDs and earthworks as part of a coordinated civil engineering strategy.

The surface water drainage strategy has also been considered in accordance with the Welsh Government's Statutory Standards for Sustainable Drainage Systems and is set out in detail within the Drainage Strategy and the Proposed Drainage Layout, both of which are submitted in support of the planning application.

The Proposed Drainage Layout details the following proposals across the site:

- The storm drainage pipe entering the site from the south would need to be diverted around the new building footprint;
- Significant earthworks, proposed slopes are in the general direction of the Nant yr Afan to retain the existing catchment flow paths. The proposed earthworks have shaped and informed the drainage strategy;
- Foul flow would be connected to the combined network in the Llantwit Fardre Sport club access road, this would be drained via gravity;
- Rainwater harvesting would be employed on site;
- The majority of storm flow would be discharged using existing outfalls on site. Storm water at Llanilltud Faerdref would outfall into the Nany yr Aran watercourse;

- Rainwater would be captured on the roof using guttering and downpipes which would feed into a raingarden. Raingardens would be used to capture surface water runoff where possible but would be supplemented with bioretention channels, in built fall channels and grass topped filter drains. Permeable block paving has been employed in the car parking bays and the MUGA would be constructed using permeable asphalt paving;
- Green landscaped areas are proposed for the site; and
- Dry basin to attenuate flow. Vortex control devices would be used to limit the discharge. The MUGA, raingardens and permeable paving would serve an attenuation function.

The proposed drainage strategy for foul drainage, stormwater drainage and water quality measures are provided in the Drainage Strategy submitted in support of the planning application.

4.2.9 Construction

The existing school building would be able to remain operational as the new proposed building is constructed on the existing playing field. The main impact upon the school during the construction phase would be the reduction in outdoor play space in the interim.

Utility connections would be carefully planned as many enter the site through the main vehicular site entrance which would remain open to all users. The existing pipe entering the site from the south would require diversion and would remain in the permanent case to retain the existing drainage provision.

The Applicant would ensure that the works are planned to ensure safety, to minimise environmental impact and avoid disruption. During the proposed demolition works, the main existing access may be used for construction traffic, however, this would be managed so as not to disrupt the operation of the school, including access to the playing fields. There would also be a clear separation of works from the live operation of the school during both the initial build period and the demolition phases to minimise risk to the school occupants.

A Demolition Strategy for the existing school buildings would be developed by the Main Contractor, once appointed and subject to successful planning consent being achieved.

A Phasing Strategy is included as part of the Design and Access Statement submitted in support of the planning application.

4.3 List of Plans and Documents

The following plans and documents are submitted in support of the planning application and provide details of the proposed development.

Plans

Table 2: Submission drawings

Drawing Number	Drawing Title
RH0301-SRA-00-00-DR-A-02000	Site Location Plan
RH0301-SRA-00-00-DR-A-02001	Site Plan
RH0301-SRA-00-00-DR-A-02002	Proposed Site Plan
RH0301-ALA-00-XX-DR-L-00018	General Arrangement Plans 1 of 2
RH0301-ALA-00-XX-DR-L-00019	General Arrangement Plans 2 of 2
RH0301-SRA-01-00-DR-A-02100	General Arrangement Ground Floor Plan
RH0301-SRA-01-00-DR-A-02400	Out of Hours Use Ground Floor
RH0301-SRA-01-01-DR-A-02101	General Arrangement Kitchen Plant Level Floor Plan
RH0301-SRA-01-RF-DR-A-02101	Roof Plan 1 of 2
RH0301-SRA-01-RF-DR-A-02102	Roof Plan 2 of 2
RH0301-ALA-00-XX-DR-L-00020	Landscape Visualisations
RH0301-SRA-01-XX-DR-A-02200	Elevations
RH0301-ALA-00-XX-DR-L-00015	Site Sections 1 of 2
RH0301-ALA-00-XX-DR-L-00016	Site Sections 2 of 2
RH0301-SRA-01-XX-DR-A-02300	General Arrangement Sections AA, BB, CC, DD
RH0301-SRA-01-00-IM-A-02851	Internal View Heartspace View 1
RH0301-SRA-01-ZZ-IM-A-02853	Internal View Heartspace View 2
RH0301-SRA-01-ZZ-IM-A-02852	Internal View Heartspace Section
RH0301-SRA-01-ZZ-IM-A-02800	Aerial View Looking North
RH0301-SRA-01-ZZ-IM-A-02801	Ground Level View Entrance
RH0301-SRA-01-ZZ-IM-A-02802	Bay Study Typical One Storey
RH0301-ALA-00-XX-DR-L-00007	Fencing and Security Strategy
RH0301-ALA-00-XX-DR-L-00005	Landscape Illustrative Masterplan
RH0301-ALA-00-XX-DR-L-00008	Access and Circulation Plan
RH0301-ALA-00-XX-DR-L-00013	Planting Strategy
RH0301-ALA-00-XX-DR-L-00014	Outline Levels
RH0301-ARP-ZZ-00-DR-C-00021	Existing Utilities Plan
RH0301-ARP-ZZ-00-DR-C-00081	Utilities Plan
RH0301-ARP-ZZ-00-DR-C-00041	Drainage Plans

Documents

- Application Forms and Certificates
- Arboricultural Impact Assessment
- CIL Form
- Design and Access Statement
- Drainage Strategy
- Ecological Impact Assessment
- Flood Consequences Assessment
- Noise Impact Assessment
- Ground Investigation Reports
- Pre-Application Consultation (PAC) Report
- Planning Statement (this document)
- Transport Assessment including Travel Plan

5 Planning Policy

5.1 The Development Plan

This Chapter sets out the national and local planning policy to be considered in the determination of the planning application.

Section 70(2) of the Town and Country Planning Act 1990 requires that in dealing with an application for planning permission a local planning authority *“shall have regard to the provisions of the development plan, so far as material to the application”*.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 adds *“if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”*

The Development Plan is defined by Section 38(3) of the Planning and Compulsory Purchase Act 2004 (in Wales) as:

- “(a) the National Development Framework for Wales,*
(b) the strategic development plan for any strategic planning area that includes all or part of that area, and
(c) the local development plan for that area.”

The Development Plan for the application comprises the following:

- Future Wales – The National Plan 2040 – National Development Framework (2021).
- Rhondda Cynon Taf Local Development Plan up to 2021 – Written Statement (2011).
- Rhondda Cynon Taf Local Development Plan up to 2021 – Proposals Map (2011).
- Rhondda Cynon Taf Local Development Plan up to 2021 – Constraints Map (2011).

5.1.1 Future Wales – The National Plan 2040 – National Development Framework (2021)

Future Wales – The National Plan 2040 (Future Wales) was published in February 2021 is the new National Development Framework for Wales, replacing the Wales Spatial Plan, setting the direction for development in Wales to 2040. It is a development plan document with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

It is a spatial plan, meaning it sets the direction for where Wales should be investing in infrastructure and development for the greater good of Wales and its people. It is the highest tier of the development plan and is focused on solutions to issues and challenges at a national scale. Strategic and Local Development Plans are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future Wales work together effectively. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.

The following Strategic and Spatial Choices policies are considered to be of relevance to the proposed development:

Policy 2 – Shaping Urban Growth and Regeneration – Strategic

Placemaking: *“The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed use centres and public transport, and integrated with green infrastructure.”*

Policy 9 – Resilient Ecological Networks and Green Infrastructure: *“To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:*

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

In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit) the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature based approaches to site planning and the design of the built environment.”

Policy 12 – Regional Connectivity – *“Active travel must be an essential and integral component of all new developments, large and small. Planning authorities must integrate site allocations, new development and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement. Planning authorities must act to reduce levels of car parking in urban areas, including supporting car free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points.”*

5.1.2 RCT Development Plan

The RCT LDP was adopted in 2011 and has a plan period of 2006-2021. It comprises a Written Statement, Proposals Map and Constraints Map.

The aim of the LDP is to provide a framework for making rational and consistent decisions on planning applications and to guide development to appropriate locations. It contains a number of strategic, general and topic specific policies which will be taken into consideration in the formation of the proposed development and planning application. The policies of most relevance to the proposed development are set out below.

The Proposals Map

The Proposals Map from the adopted LDP indicates the following for the site:

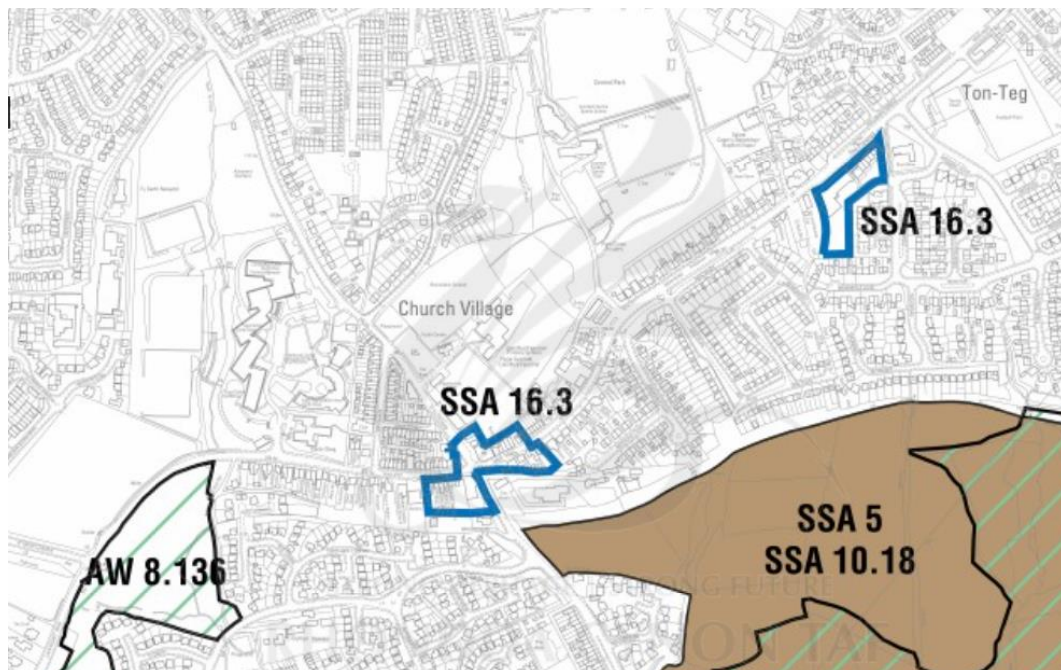
- The application site is located within the Church Village Settlement Boundary (**Policy SSA 13**) which is identified as a ‘Small Settlement’ within the Southern Strategy Area (**Policy CS 2**) and is surrounded by residential development to the north and south, road infrastructure and commercial development to the west and south. Also, to the northeast lies an area of woodland and park.
- The site is adjacent to the Church Village (Centre) Local and Neighbourhood Centre to the South (**Policy SSA 16.3**).
- Tonteg (Precinct) located to the southeast of the site is identified as a Local and Neighbourhood Centre (**Policy SSA 16.3 – The Retail Hierarchy**).
- A housing allocation for 160 dwellings is located to the west of the site (**Policy SSA 10.16 – The Link Site, Pen-yr-Eglwys, Church Village**).
- A housing allocation for 500 dwellings is located to the south of the site (**Policy SSA 10.18 – Land south of The Ridings, Tonteg and east of Station Road, Church Village**).
- The housing allocation at Land south of the Ridings, Tonteg and east of Station Road, Church Village southern and eastern areas (**Policy SSA 10.8**) is also within the Tonteg Marsh Site of Importance for Nature Conservation (SINC) which is highlighted as a Protection and Enhancement of the Natural Environment area (**Policy AW 8.138**).
- The site is also situated within proximity to various other SINC's including Duffryn Dowlais (**Policy AW 8.136**), Llantwit Fardre (**Policy AW 8.137**), Brynhill Chapel Grasslands (**Policy AW 8.14**), Coed y Fadre (**Policy AW 8.141**) and The Willowford (**Policy AW 8.161**).
- A Green Wedge is located to the southwest of the site identified as Land between Glyncoch and Ynysybwl (**Policy SSA 22.7**). Another Green Wedge is located to the west of the site identified as Land between Beddau / Tyn-y-Nant and Llantwit Fardre (Crown Hill) / Church Village (**Policy SSA 22.6**).
- There are Special Landscape Areas further afield surrounding the site, to the north of the site lies the Treforest Western Slopes (**Policy SSA 23.11**) and to

the east lies the Efail Isaf, Garth and Nantgarw Western Slopes (**Policy SSA 23.8**).

- **Policy SSA 21.6** identifies the Pontypridd to Tonyrefail via Llantrisant Cycle Network Improvements to the north of the site.

The site has no other land use or planning designations but is surrounded by residential development to the north and south, road infrastructure and commercial development to the west and south. Also, to the northeast lies an area of woodland and park. The relevant extract from the Proposals Map is in Figure 9.

Figure 9 Proposals Map extract

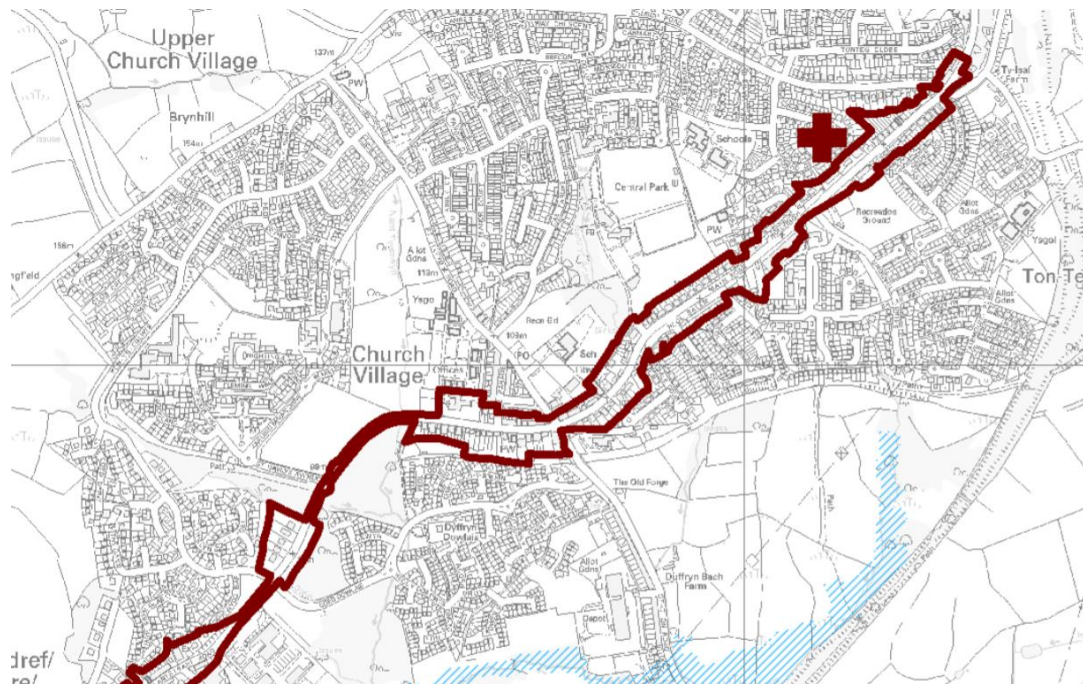


Constraints Map

The Constraints Map identifies an Air Quality Management Area (AQMA) to the south of the site along the main road / B4595 through Church Village. The Church Village AQMA was declared on 13 March 2015 for Nitrogen dioxide NO₂.

There is the Grade II Llantwit Faerdref Parish Hall Listed Building to the south. The site is not within a flood zone. The relevant extract from the Proposals Map is in Figure 10.

Figure 10 Constraints Map extract



Written Statement

The Written Statement of the LDP contains a number of strategic, general and topic specific policies of relevance to the proposed development as outlined below.

Core Policies

The Core Policies within the plan are the key guiding policies deemed essential for delivery of the strategy. The policies provide a framework for determining where existing and future residents of RCT live, work, shop, recreate and how they travel in between.

The relevant LDP Core Policies are as follows:

- Policy CS 2 Development in the South

Area Wide Policies

In addition to the Core Policies, the detailed Area Wide Policies are the basis for the determination of planning applications for the development and use of land and buildings.

The relevant LDP Area Wide Policies are as follows:

- AW 2 Sustainable Locations

- AW 4 Community Infrastructure & Planning Obligations
- AW 5 New Development
- AW 6 Design and Placemaking
- AW 7 Protection and Enhancement of the Built Environment
- AW 8 Protection and Enhancement of the Natural Environment
- AW 10 Environmental Protection and Public Health
- AW 12 Renewable & Non-Renewable Energy

5.2 Material Planning Considerations

As required by Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The other policy and guidance documents that form material considerations in the determination of this planning application are:

- Emerging RCT Local Development Plan 2020-2030
- RCT's adopted Supplementary Planning Guidance (SPG):
 - SPG 1 Design and Placemaking;
 - SPG 2 The Historic Building Environment;
 - SPG 3 Design in Town Centres;
 - SPG 6 Nature Conservation;
 - SPG 8 Access Circulation and Parking;
- Planning Policy Wales, Edition 11 (2021);
- Building Better Places (2020);
- Technical Advice Notes (TAN):
 - TAN 5: Nature Conservation and Planning;
 - TAN 11: Noise;
 - TAN 12: Design;
 - TAN 15: Development and Flood Risk;
 - TAN 16: Sport, Recreation and Open Space;
 - TAN 18: Transport;
 - TAN 20: Planning and the Welsh Language; and

- TAN 21: Waste.

5.2.1 Emerging RCT Local Development Plan 2020-2030

RCT are currently in the process of preparing their new Development Plan which will cover the period 2015-2030. The emerging LDP is at a very early stage with the Preferred Strategy (Pre-Deposit) Consultation anticipated to commence in November / December 2021.

Due to the early stages of preparation, the existing RCT LDP (2011) remains the development plan for consideration when determining the planning application and the emerging plan is likely to be given minimal weight as a material planning consideration.

5.2.2 Planning Policy Wales – Edition 11 (2021)

Published in February 2021, the eleventh edition of Planning Policy Wales (PPW11) sets out the land use planning policies of the Welsh Government. PPW11 has been prepared in the light of the Well-being of Future Generations (Wales) Act 2015 (WFGA), the objectives of which represent the central thread running through the document and has recently been updated to reflect the publication of Future Wales.

The central thread of the WFGA remains within the PPW11, which also focuses on the multi-faceted concept of Placemaking. This relates to the delivery of Sustainable Places to support the well-being of people and communities across Wales. The interlinkages between key planning principles (such as growing the economy in a sustainable manner, making the best use of resources, facilitating healthy and accessible environments, creating and sustaining environments, and maximising environmental protection) and the “five ways of working” (prevention, long term, collaboration, integration and involvement) should be integrated within the plan-making and development management processes. It is stated that this approach will contribute both to Placemaking and well-being.

PPW11 reaffirms the presumption in favour of sustainable development and requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural, as set out within the WFGA.

PPW11 highlights the importance of proposals taking a placemaking approach, specifically, guiding proposals to take a holistic approach when planning and designing development and spaces, focusing on positive outcomes. The concept of placemaking should be considered at all levels including at a global scale through paying key consideration to climate change; and also, at a more local scale, considering the amenity impact on neighbouring properties and people.

In line with the principles of the Well-being Act, PPW11 is organised around four key themes; ‘Strategic and Spatial Choices’, ‘Active and Social Places’, ‘Productive and Enterprising Places’ and ‘Distinctive and Natural Places’.

Chapter 3 ‘Strategic and Spatial Choices’ focuses on placemaking and strategic development. Paragraphs 3.3 - 3.13 of the PPW11 set out five key objectives to

achieving good design: *“access and inclusivity; environmental sustainability; character; community safety; movement”*.

Paragraph 3.7 sets out that *“developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.”*

Paragraph 3.9 sets out that *“the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations.”*

Paragraph 3.30 sets out the Sustainable Management of Natural Resources (SMNR) framework as outlined within The Environment (Wales) Act 2016. PPW11 states that, *“amongst other considerations, the planning system can contribute to the SMNR approach through ensuring resilient locational choice for infrastructure and built development, taking actions to move towards a circular economy and facilitate the transition towards economic decarbonisation”*.

Paragraph 3.55 sets out that *“Previously developed (also referred to as brownfield) land...should, wherever possible, be used in preference to greenfield sites where it is suitable for development.”*

In terms of the provision of new infrastructure, Paragraph 3.62 states that, *“planning authorities should, in conjunction with key providers, take a strategic and long-term approach towards the provision of infrastructure as part of plan making. This may involve collaboration between planning authorities and key infrastructure providers to ensure infrastructure provision is sustainable”*.

Paragraph 3.61 refers to the need for adequate and efficient infrastructure, such as *“education facilities, as crucial for economic, social and environmental sustainability”*. It states how infrastructure which is poorly designed or badly located can exacerbate problems rather than solving them.

Chapter 4 ‘Active and Social Places’ outlines components of placemaking required to create well connected and cohesive communities covering the following:

- Transport;
- Housing;
- Retail & commercial development;
- Community facilities; and
- Recreational spaces.

With regards to transport, paragraph 4.1.1 states that people should have access to jobs and services through more efficient and sustainable journeys, by walking, cycling and public transport. PPW11 further states that *“new development should prevent problems from occurring or getting worse such as...the reliance on the private car and the generation of carbon emissions.”*

It is a priority of Welsh Government to reduce reliance on the private car and support a modal shift to walking, cycling and public transport. PPW11 states that *“Delivering this objective will make an important contribution to decarbonisation, improving air quality, increasing physical activity, improving the health of the nation and realising the goals of the Well-being of Future Generations Act”* (paragraph 4.1.9). The Sustainable Transport Hierarchy for Planning illustrates how development proposals must seek to prioritise walking, cycling and public transport ahead of the private motor vehicles. The Sustainable Transport Hierarchy for Planning, as presented within PPW11.

Within paragraph 4.1.38, the role of public transport in the sustainability of places is underlined, stating that *“it enables people to undertake medium and long journeys without being dependent on having access to a car.”* In addition to this, paragraph 4.1.37 states that *“Planning authorities must ensure the layout, density and mix of uses of new development support the use of public transport and maximises accessibility potential.”*

PPW11 also encourages the use of Ultra Low Emission Vehicles (ULEVs) and the provision of ULEV charging points as part of new development. Whilst referencing Future Wales for the specific requirements, paragraph 4.1.41 states that *“The provision of electric vehicle charging points should be planned as part of the overall design of a development. Charging points must not cause an obstruction to walking or cycling, should be resistant to vandalism, and located where there is good lighting and natural surveillance.”*

In relation to community facilities, paragraph 4.4.1 states that they *“contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places.”* Community facilities are noted to include schools.

With regards to recreational spaces, paragraph 4.5.4 states *“All playing fields whether owned by public, private or voluntary organisations, should be protected from development except where:*

- *facilities can best be retained and enhanced through the redevelopment of a small part of the site;*
- *alternative provision of equivalent community benefit is made available locally, avoiding any temporary loss of provision; or*
- *there is an excess of such provision in the area.”*

Chapter 5 Productive and Enterprising Places deals with the economic components of placemaking. These places are designed and sites to promote healthy lifestyles and tackle the climate emergency. This is done by making them: easy to walk and cycle to and around’ accessible by public transport; minimising the use of non-renewable resources; and using renewable and low carbon energy sources.

Paragraphs 5.8.1 and 5.8.2 states that *“The planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future*

effects of climate change through the incorporation of effective mitigation and adaptation measures. The Welsh Government's policy is to secure zero carbon buildings while continuing to promote a range of low and zero carbon technologies as a means to achieve this."

Chapter 6 Distinctive and Natural Places covers environmental and cultural components of placemaking. PPW11 sets out how development must protect the special characteristics of the natural and built environment including the historic environment, green infrastructure, landscape biodiversity and ecological networks.

Green infrastructure is considered core to the creation and management of distinctive and natural places. PPW11 states that green infrastructure assets and networks should be protected owing to their multi-functional roles such as providing benefits for the health and well-being of communities as well as the environment (paragraph 6.2.4).

Paragraph 6.4.3 gives focus to biodiversity and ecological networks and sets out a number of considerations for development proposals to consider. This includes that development proposals must consider the need to *"support the conservation of biodiversity, in particular the conservation of wildlife and habitats"* (paragraph 6.4.3).

Paragraph deals with biodiversity and ecological networks and states *"The Environment (Wales) Act 2016 introduced an enhanced biodiversity¹¹⁹ and resilience of ecosystems¹²⁰ duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals."*

The Section 6 Duty requires *"Planning authorities to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity."*

The contribution of good air quality to the quality of places and health and well-being is underlined in paragraph 6.7.19. PPW11 states how it can be inappropriate to locate sensitive uses such as schools adjacent to busy roads where no connectivity benefits can be gained and where health and amenity impacts will be unacceptable.

5.2.3 Building Better Places (2020)

In July 2020 Welsh Government published its policy position on how the planning system can assist in the COVID-19 recovery period. 'Building Better Places' is intended to sit alongside PPW11 and is a key consideration in both plan preparation and development management. 'Building Better Places' expands on the letter issued to Chief Planning Officers from Julie James (Minister for Housing and Local Government) in July 2020 which acknowledges that the economic consequences of the COVID-19 pandemic are predicted to be severe and felt across all sectors, including those in construction and the built environment. 'Building Better Places' emphasises both the primacy of the plan led system in Wales but also the need to have places and place-making at the heart of

the recovery process. The policy agenda seeking to deliver better places and placemaking develops the principles already enshrined in PPW11. The pandemic has highlighted the importance of the need for good quality places for people to live, work and relax. 'Building Better Places' seeks to ensure that the economic hardship owing to the pandemic does not outweigh the above principles and policies.

It is clear that an immediate supply of development land is essential if we are to build the better places envisaged by Welsh Government and lead the recovery that is desperately required. New development delivering positive social and economic outcomes as well as addressing climate change concerns needs to be happening on the ground in the short term and cannot simply await the completion of the LDP review process in five years' time.

Welsh Government has recognised this issue and in respect of development management, 'Building Better Places' states *"PPW and the NDF can be used directly in the decision making process. The WG will support decisions taken in this context, particularly in the short-term until an LDP is adopted"*. This is a very important concession and allows for new development in the short term that truly embrace the principles and policies of delivering better places and placemaking.

The guidance includes a Welsh Government commitment to follow through on infrastructure obligations which will go a long way in ensuring that the developments envisioned are delivered and the wider public benefits are maximised.

It also emphasises that development management decisions should focus on creating healthy, thriving active places with a focus on a positive, sustainable future for our communities. The planning system has an important role in supporting healthier lifestyles and reducing inequalities.

5.2.4 Technical Advice Notes

The following TANs are of relevance to the proposed development:

- TAN 5: Nature Conservation and Planning;
- TAN 11: Noise;
- TAN 12: Design;
- TAN 15: Development and Flood Risk
- TAN 16 : Sport, Recreation and Open Space;
- TAN 18: Transport;
- TAN 20: Planning and the Welsh Language; and
- TAN 21: Waste.

6 Planning Assessment

6.1 Introduction

This Chapter sets out the key planning considerations that should be taken into account in the determination of the planning application for the redevelopment of Llanilltud Faerdref Primary School.

Key policy considerations are summarised below into key themes and presented with an explanation of how the proposed development aligns with local and national adopted planning policy.

The proposals are considered to be in overall accordance with the LDP, Future Wales and Development Plan as a whole. They are further considered to accord with the relevant policies from PPW11, which forms a material planning consideration. Given that PPW11 has been prepared in accordance with the WFGA and embodies its central themes, it is further considered that conformity with PPW11 demonstrates alignment with the WFGA.

6.2 Principle of Development

6.2.1 Established use on the Application Site

The application site is within the Church Village Settlement Boundary within the Southern Strategy Area of the LDP. Church Village is defined as a ‘Small Settlement’ within the settlement hierarchy. **Policy CS 2** of the LDP promotes development within settlement boundaries and on previously developed land which are both characteristics of the development site given its existing use as a school. The site has no other planning or land use designations and is not allocated for development according to the LDP and therefore, the principle of redevelopment for a school is already established.

In addition, **Policy AW 2** of the LDP sets out that development on non-allocated sites is only supported in sustainable locations, located within the defined settlement boundary and with access to a range of services and facilities. The site is located within the defined settlement boundary, accessed by a school bus and is also located within proximity to a number of public bus stops and is a 13-minute cycle ride from Trefforest railway station. The site is considered to be in a sustainable location and the proposal would support the role and function of the Small Settlement and would not conflict with surrounding uses.

PPW11 reaffirms the presumption in favour of sustainable development and requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural, as set out within the Well-being of Future Generations (Wales) Act 2015. **Policy 1** of **Future Wales** outlines that the Welsh Government supports sustainable growth in all parts of Wales. In the three national growth areas including Cardiff, Newport and the Valleys there will be growth in employment and housing opportunities and investment in infrastructure.

Furthermore, given the proposed development comprises the redevelopment of existing education facilities and primarily serves the settlement of Church Village, it is not considered that the development would be defined as significant education development in accordance with **Policy 6** of Future Wales and its location within Church Village is therefore considered to be acceptable.

6.3 Policy Considerations

6.3.1 Design

In accordance with RCT's planning application validation requirements, a Design and Access Statement and detailed drawings including floor plans, sections and elevations are submitted in support of the planning application to articulate the details of the proposed development in relation to materials and design.

The site layout has been designed with careful consideration for the site constraints, as well as capitalising on the opportunities of the site.

The proposed development would be organised with the primary school to the south of the site, situated within proximity of the properties along the Main Road / A473 and the car park adjacent to the Parish Hall. The proposed school building would be located in the location of existing playing fields at the south of the school site. The main hall would be located to the western side of the building, in close proximity to the main entrance and public site approach for wider community access. A car park and drop off facility would be located adjacent to the proposed school building, to the north-west.

Given the proposed school building would be one storey in height, the location of the proposal and given the main views of the Grade II Parish Hall Listed Building would be from the Main Road / A473, it is not considered the proposal would have a detrimental impact to the Grade II listed heritage asset.

The school building itself has been designed to benefit from good natural environmental conditions through maximising natural ventilation and natural lighting of spaces whilst minimising summer overheating.

Public art proposals will be detailed within the future planning application.

Proposed materials are as set out within the Design and Access Statement and on the Elevation drawings, these are as follows:

- Grey Multistock Brick – used for the facing brickwork main facades at ground level;
- Aluminium standing seam – used to clad all expressed roofs and wrapped down onto external walls and feature chimneys;
- Aluminium cladding – used for school signage with the feature colour to be confirmed; and
- Glass – provided with solar control coating and a neutral appearance.

The materials listed above have been selected as they are considered sympathetic to the character and context of the site and would create an attractive and high quality design that is considered to enhance the site and sense of place, in line with **Policy AW5** and **Policy AW5**.

Crime prevention is a material planning consideration and RCT have influenced the South Wales Police Crime Plan 2021- 2025. Crime prevention measures have been incorporated into the proposals in accordance with **Policy AW 5**, including the layout of the proposed development to ensure overlooking of outside spaces and physical security features such as CCTV to prevent instances of crime within the site.

Additional crime and anti-social behaviour prevention measures within the proposed design include: a secure building line and zoned areas to ensure controlled access for parents and appropriate levels of public access for the proposed development's community use outside of school operating hours; perimeter fencing around school buildings and MUGA, which would meet Secured by Design (SBD) standards and specifications (being at least 2.4 metres high, weld mesh, expanded metal or similar, and be of a design that is difficult to climb over). MUGA sports fencing would be 3m in height.

External elevations of the school buildings, main entrances, public circulation areas, vehicle parking areas, bike and bin stores, and the pupil play areas would be protected by CCTV. New and existing trees would be placed or maintained in areas that would not interfere with CCTV and lighting.

A Fencing and Security Strategy Plan provides complete details in relation to the siting, materials and dimensions of proposed site-wide fencing and is enclosed with the planning application.

To maintain security and meet safeguarding requirements, access from the lobby/reception area into the main school would be controlled by access control in line with SBD standards and specifications. The number of public entrances within the proposed development has been limited to control visitors.

Site-wide lighting including for vehicular parking would also ensure that external areas are well lit and protected from vandalism and other crimes. Lighting would be controlled by photo voltaic cells or time switches and would complement and enhance the CCTV coverage on site. Details of the lighting strategy are set out further in Section 6.3.5 below

In addition, crime prevention measures would be implemented for drain pipes, doors and windows to meet SBD standards.

Overall, the design has been developed appropriate to the sensitivity of the proposed end use as an educational facility and has been informed by early correspondence with a Designing Out Crime Officer for South Wales Police, who provided an initial security strategy appraisal.

6.3.2 Sports Facilities

Part of the application site is currently used for playing fields, the AW and PPW Policies seek the retention or demonstration that the lost space can be provided elsewhere through **Policy AW6, Policy AW7 and PPW 11**.

Whilst the proposed development would result in the loss of 3,511.55sqm of playing fields at the south east of the site, it is considered the proposals would compensate this loss through the provision of new dedicated and enhanced sports facilities. As set out in section 4.2.2, this includes 2no. MUGA courts and a formal sports area.

It is therefore considered that the loss of the playing fields would be offset by the proposed enhancements of sports facilities, which would still result in 3,030.34sqm of playing field area including 2no. MUGA courts at the north and west of the site as shown in Figure 2 in section 4.2.2.

6.3.3 Sustainability and Climate Change

A key design principle driving the proposed development includes efficiency and net zero carbon measures. The proposed design would be net zero carbon in operation.

As discussed in Section 4.2.4, the development has been designed to meet a strict operational net zero carbon target, whereby an equivalent amount of operational energy consumed on site (both regulated and unregulated) would be generated by an extensive roof mounted solar photovoltaic array. This array would enable the proposed development to offset 100% of the carbon emissions annually for the energy usage of the building, therefore being 'net zero carbon' in operation in line with the UK Green Building Council framework definition.

The current proposals outline generation of 100% of the annual energy consumption via roof mounted photovoltaic arrays at each of the schools (Penygawsi Primary School and Pontyclun Primary School). However, discussions are ongoing with the local grid operator as the electrical infrastructure at each of the school sites has limited capacity to accept surplus energy generation. Mitigation steps are being developed such as upgrading this infrastructure where possible, as the preference would be onsite generation. In the event that this is not possible as part of the construction process or in the near future, then the design will look to install appropriately sized onsite PV arrays and then offset and shortfall in carbon emissions (using a recognised local offsetting scheme) to remain true to the definition of NZC.

As such, it is considered that the proposed development would exceed the policy requirements set by **Policy AW 12** and contribute towards Welsh Government commitments to achieving net zero by 2050, as set out in **PPW11**.

In addition, the considered selection of materials and methods of construction, approach to efficient and lean design, and designing for construction and re-use would achieve a more sustainable design and reduce embodied and whole life carbon. A BREEAM 'Excellent' rating under the 2018 Education assessment would be sought through the proposed development.

A Building Management System (BMS) would be to control and monitor the school's ventilation, heating, cooling and electrical systems. An automated Energy Metering System (EMS) would be utilised to collect and manage energy usage data from the proposed school building. The system would interface with the BMS system to collect incoming utilities data, sub-metered data (including heating, lighting and cooling energy); and other feedback data including internal room temperatures and CO2 levels.

Passive design of daylighting has been prioritised initially to reduce the requirement for artificial lighting and reduce energy consumption. This has been a result of climate-based daylight modelling (CBDM), using the Useful Daylight Index (UDI) metric.

The proposed new building structures would also be designed for safe deconstruction at the end of design life, with layer independence (i.e. non-structural elements may be replaced without impacting the principal structural frame, or overall structural integrity). The design considers future adaptability and potential expansion, alongside resource efficiency, thereby excelling policy requirements set by **Policy AW 12** of the LDP.

6.3.4 Transport and Access

A Transport Statement is submitted as part of the planning application demonstrating compliance with **SPG8** and The Sustainable Transport Hierarchy for Planning.

As detailed within the Transport Assessment, it is not considered that the new school would have a material impact on the local highway network; and that a minor change in mode shift attributed to improved facilities and routes for active travel could result in lower overall trip generation.

Pedestrian and Cycle access would be via a new pedestrian entrance to the west of the site, accessed via a Public Right of Way (PRoW) which runs from Main Road and adjacent to the Parish Hall. This strategy means that any potential conflict between pedestrians/cyclists and vehicular traffic is minimised and managed, to encourage sustainable travel. In addition, delivery of the relevant RCTCBC Integrated Network Map (INM) routes within the site's surroundings as part of the school's redevelopment, will help improve active travel infrastructure and encourage more parents, pupils and staff to travel by more sustainable modes.

A total of 23 no. car parking spaces including accessible and visitor parking bays would be provided as part of the proposals, in accordance with RCT Access Parking and Circulation SPG.

There are a total of 32 no. cycle spaces proposed through the provision of 16 no. will be covered Sheffield style stands. This exceeds the minimum standards set out by RCTCBC and will encourage more pupils/staff to travel to the site sustainably. Further expansion of cycling facilities could also be introduced should it be warranted by demand.

The proposed layout as depicted on the Site Layout Plan would include its main vehicular access as per the existing school from St. Illtyds Road, which leads into

the application site at its north-western corner and into the new proposed car park. The site layout places emphasis on pedestrians and cycles to ensure that the main site approach is not dominated by vehicles. By using the existing access, the proposed development would not compromise safe, effective and efficient use of the highway network and would not have an adverse impact on highway safety, in line with **Policy AW 2**.

EV charging points (to the minimum standard of 10%) are also included in the proposals, and definitive provision would be set out within the planning application. This would align with **SPG 8** (Access, Circulation and Parking Requirements) and **Policy 12** of **Future Wales**.

The Transport Assessment and Travel Plan further detail elements of the scheme including integration with public transport links, deliveries and refuse collection, traffic management and emergency service areas. Both of these technical documents focus on positively influencing sustainable and active travel including through the reduction of single car occupancy trips to comply with **Policy AW 2** of the LDP. This demonstrates how the development aligns with The Sustainable Transport Hierarchy for Planning set out in **PPW11**.

Moreover, the Transport Assessment and Travel Plan set out several wide measures which could be introduced to encourage walking, cycling and public transport use for pupils, parents and staff members. Proposed measures include 'Walk to School Week', bicycle training courses and frequent monitoring of travel to the school against targets seeking to increase the proportion of journeys made by sustainable travel modes.

In conclusion, the Transport Assessment indicates that overall, the proposed development satisfies the policy requirements of Future Wales, the LDP and emerging LDP with respect to issues of transport and accessibility.

6.3.5 Residential Amenity

The application site is surrounded by residential properties to the west and north, with largely commercial properties bordering the site to the south. Impacts on residential amenity have been considered throughout the design development, namely, siting, scale and massing of the school building, and landscaping proposals that would provide natural screening.

The proposed school building would be located closest to the commercial properties bordering the Main Road. It would also be one storey and it has been designed to ensure that there would not be any issues of concern in relation to overlooking, overshadowing or overbearing.

The scale and massing of the proposed development in terms of footprint and height are considered appropriate for the site, given its size and current use as an educational facility. The proposed school would be one storey in height, comparable to the existing school building, also one storey in height. The surrounding properties vary in height from the one storey Llantwit Fardre Community Centre to two storey residential dwellings.

The existing car park located between the new school building and the nearest residential properties provides a suitable separation distance to respect local residential amenity. It is not considered the proposal would result in any adverse overshadowing or overbearing impacts for properties located to the east and south.

Proposed windows on the western elevation would be at ground floor level only and the roofscape on this elevation would not include any rooflights. It is not considered that the proposal would result in overlooking as windows are at ground floor level, the separation distances to the residential properties, the retained trees and proposed screening along the site boundary. As such, proposals are compliant with **Policy AW 5** of the LDP.

The proposed school building would also be available for some community use, although this will largely be limited to internal spaces. There may be some out of hours use of the MUGA for the school, however, this will not be late into the evening so as to require floodlighting. It is therefore considered that any noise and light pollution impacts of the proposed development would be minimal and not dissimilar to the existing conditions at the site and surroundings which already contain a number of sports facilities.

In addition, the proposed development would be unlikely to have impacts on residential amenity as the site is in use as a primary school and the site already includes existing sports facilities both on it and in the surrounding area. Whilst the proposal would likely marginally increase the number of users of the site, the development would be located nearest to the high street and further away from residential development, the overall impact upon residential amenity is considered to be negligible.

6.3.6 Air Quality

The site is located within proximity of the Church Village Air Quality Management Area (AQMA) which has been declared along Main Road / B4595 through Church Village for exceedances of Nitrogen dioxide NO₂.

An Air Quality Impact Assessment has been carried out to determine the likely significant effects of the proposed development at the school. Diffusion tube monitoring data within 2km of the Proposed Development showed there were no exceedances of the annual mean objective for NO₂ in 2018 or 2019. The most recent exceedance was in the Church Village AQMA in 2017. The closest monitors to the Proposed Development monitored an annual mean NO₂ concentration of 23.1 and 30.3µg/m³ in 2019 which are both below the air quality objective.

Construction effects have been assessed using the qualitative approach described in the Institute of Air Quality Management (IAQM) guidance. It was concluded there is a low risk from the dust-generation activities on-site during earthworks, construction and associated trackout. With the appropriate best practice mitigation measures in place there are likely to be no significant effects from dust emissions during construction.

A screening assessment was carried out on the additional traffic movements associated with the Proposed Development using the EPUK/IAQM screening

criteria. The screening criteria were not met and therefore the impact of the Proposed Development on air quality is likely to be negligible.

In conclusion, the Air Quality Impact Assessment demonstrates the proposal will not have significant detrimental impacts on air quality, it is therefore considered that the proposed development aligns with **Policy AW10**.

6.3.7 Noise

Rhondda Cynon Taff Council requires the BS4142 rating level to be 5dB below the typical background noise level at the nearest and/or most exposed noise sensitive receptors. These are the residential properties to the South of the site, on the B4595 (Main Road), as agreed with RCT Council.

A Noise Impact Assessment is submitted in support of the planning application, to assess the baseline noise environment and the impact of the proposal on residential amenity and identify any mitigation measures required.

The Noise Impact Assessment, which included baseline noise surveys, sets out that:

- Site noise is dominated by road traffic on St. Illtyds Road and the B4595 (Main Road) and this is considered representative of the existing noise environment at the nearest noise sensitive receptors on the B4595 (Main Road).
- Building services noise emission limits have been set according to RCT Council requirements that the BS4142[1] rating level does not exceed 5dB below the existing background sound level.
- The inclusion of potential noise mitigation measures such as an acoustic louver around the air source heat pumps. In addition to, ducted attenuators on the intake and exhaust connection of the MVHR units
- It is suggested building services noise emissions be incorporated into the conditions for the development and be discharged as a reserved matter.

Overall, the Noise Impact Assessment demonstrates that with the addition of future mitigation measures, the noise impact will not have a detrimental impact to residential amenity. The development is therefore considered to align with **Policy AW 10** of the LDP.

6.3.8 Biodiversity and Nature Conservation

The application site is not located within any statutory environmental designations. A Preliminary Environmental Assessment (PEA) was undertaken for the site in August 2019 and Phase 2 Ecological Surveys in April 2021, and these concluded overall, there were notable plant species, assemblage of mowing tolerant flora species at a local level and the on-site pond is considered to be of value at a local level. The site did not identify any bat roosts and there is no suggestion that notable bat populations were making use of the site. Badgers,

Dormouse, Water Vole and Otters were also considered to be absent from site and discounted from further assessment.

Reptiles were considered likely absent, although the on-site pond was determined to be average suitability for Great Crested Newts. As such a further eDNA survey was undertaken which returned a negative sample therefore, it is considered Great Crested Newts are likely absent from the site.

Preliminary Roost Assessments (PRAs) of the buildings were undertaken in April 2021, comprising external inspections.

No evidence to suggest roosting was identified during the survey and no bat roosts were identified on sites. Some limited foraging and commuting activity by common pipistrelle were recorded, with bats flying from the woodland south-west over the Site. There is no suggestion of notable populations making use of the Site. However, to demonstrate compliance with the Environment (Wales) Act 2016 and the RCT Nature Recovery Action Plan, it is recommended that appropriate ecological enhancements for bats are included and implemented as part of any proposed works. Example measures are recommended as follows:

Such measures could include:

- Retention of existing access points and roost features.
- Improved access to internal roost features using appropriate access points/panels.
- Creation of bat specific spaces within lofts and other roof voids that are separate from the main spaces.
- Installation of bat tubes, bat panels, and/or bat bricks within refurbished or new buildings.
- Installation of varied bat boxes within mature trees to provide additional roosting opportunities.
- Consideration of reduced security lighting or the use of motion triggered lighting.
- Increased planting with native and species rich mixes within the sites to increase invertebrate availability and therefore improve foraging potential.

An Ecological Appraisal is submitted in support of the planning application to demonstrate that the impact of the proposed development at the site would be minimal with regards to biodiversity. The Ecological Appraisal confirms that with the implementation of some mitigation and precautionary measures as proposed here, the development is not anticipated to result in any significant residual negative effects on important ecological features.

The proposed scheme seeks to retain or replace the extensive areas of greenspace under improved management, and provide new areas of trees and landscape planting, with scope to provide net benefits for biodiversity overall. Several ecological enhancement features are also proposed for inclusion to provide additional opportunities for wildlife and educational benefits.

On-site ecological mitigation recommendations within the Ecological Appraisal includes the following:

- Buffer zone to woodland edge, impact avoidance under a Construction Environmental Management Plan (CEMP) and Arboricultural Impact Assessment (AIA);
- Appropriate buffer zone to retained trees, impact avoidance under CEMP and AIA;
- Sensitive removal methods to reduce harm to pond wildlife;
- Impact avoidance under a CEMP, reinstatement and enhancement through improved management;
- Sensitive lighting strategy, enhancement through new planting and improved management;
- Timed clearance works/pre-commencement check;

On-site ecological mitigation and enhancement recommendations within the Ecological Appraisal includes the following:

- Enhance woodland edge through improved management to encourage colonisation with native woodland species, with relaxed grassland management to support structural and floral diversity;
- Incorporation of native plants and those of wildlife importance in to the landscaping scheme;
- Net increase in tree cover and tree diversity;
- Grassland areas will be managed as longer sward to provide greater diversity in structure and species;
- Installation of an 'insect hotel', log/habitat piles to provide overwintering/nesting opportunities for a range of invertebrates;
- Opportunities for hedgehogs to move through the landscape are preserved, including the provision of hedgehog highways and boxes; and
- A range of bird and bat boxes will be provided at the site.

Each of these mitigations and enhancements are included within the final proposed design and are set out within the Landscape Illustrative Masterplan, enclosed with the planning application.

Furthermore, the change in ecological value of the site pre- and post- works has been estimated, where calculations confirm that the proposed development would minimise the biodiversity loss in terms of overall area, whilst the mitigation measures outlined above would significantly increase the biodiversity value of the site over and above that currently existing. Development would therefore provide enhancements for biodiversity and nature conservation in accordance with **Policy 9** of Future Wales, **PPW11** and **Policy AW 8** of the LDP.

6.3.9 Landscape and Trees

The application site is located adjacent to an Ancient Semi Natural Woodland named Nant Yr Araian (ID no. 1186) which forms the entire north-eastern boundary of the site, along with scattered mature trees and short sections of native hedgerow on the site. No trees on or adjacent to the site are listed on the Ancient Tree Inventory and a specific buffer size is not set out in policy requirements in Wales.

A tree survey has been carried out and a total of 12 trees were surveyed, including 10 groups of trees. G3 which is an ancient semi-natural woodland with interesting visual amenity has been identified on adjoining land to the north of the site. Overall, tree cover within the site is relatively sparse. The planting of new trees as part of the proposed development will enhance the layout in accordance with **Policy AW 8** and **SPG6**.

Details of the proposed planting schedule is contained within the Planting Strategy, submitted with the planning application.

The Arboricultural Report submitted with the planning application includes an arboricultural method statement that would be adhered to during construction. This method statement includes requirements such as buffer zones, protective barrier fencing, sensitive installation methods for proposed new hard surfaces and footbridge located within retained trees' root protection areas (RPAs); and arboricultural site monitoring.

To facilitate the proposal, 2 individual trees, 2 groups features and the parts of 2 group features would need to be removed. The removals are of low quality (category C, which would not constrain a development) or moderate quality (category B) trees which can be mitigated for with replacement planting.

The landscape enhancements that would be delivered as part of the proposed development are outlined in the Design and Access Statement and Landscape Illustrative Masterplan. Overall, the proposal would respect the landscape, there would be no impacts on the semi-ancient woodland or category A trees across the site. In addition to this, the scheme includes the planting of 30 new trees across the site.

The proposal to remove trees, provide replacement planting and the buffer zone to protect the semi natural ancient woodland meet the requirements of **Policy AW 8** and **SPG6**. The impacts of the proposed development on landscape and trees are presented in the Arboricultural Report submitted with the planning application.

6.3.10 Flood, Drainage and Hydrology

A Flood Consequences Assessment (FCA) has been undertaken for the proposed school development in accordance with the guidelines provided in **TAN15**. This identified that the proposed development is in River and Sea Flood Zone 1. In addition to, areas of Surface Water and Small Watercourse Flood Zones 2 and 3. As such locating a primary school on the site is justified. The FCA concluded that the risk of flooding for the proposed development is acceptable in accordance

with **TAN15** Development and Flood Risk. The FCA has been submitted in support of the application.

In line with **Policy AW 10**, SUDS are also included as part of the development proposals including raingardens and attenuation basin. The storm water strategy will account for the water quality of the discharge into the watercourse in accordance with guidance. Pollution control would be achieved through prevention mechanisms, interception and treatments implementing SUDs to manage and treat surface water runoff. A Drainage Strategy and SUDs Application to the SABs Authority has also been submitted alongside the planning application to ensure compliance with relevant legislation.

6.3.11 Ground Conditions and Contaminated Land

A Phase 1 Geo-Environmental Desk Study Report and Phase II Geo-Environmental Assessment were undertaken at the site which concluded, the screening process for on-site human health receptors show that the General Assessment Criteria's (GACs) for a residential without home grown produce setting were not exceeded. The concentrations of potential contaminants recorded at the site indicates an acceptably low risk and therefore mitigation measures are not required as part of the development.

In addition to this, the gas monitoring to date indicates that ground gas protection measures are not likely to be required as part of the development. Based on the chemical analysis report it is considered that specialist materials are unlikely to be required for water supply pipes at the site due to the low levels of contaminants recorded.

A Coal Mining Risk Assessment has also been undertaken at the application site, which confirms:

- Due to the age and depth of nearby coal seams, risk to the development from these workings will be negligible.
- There is a low risk of combustion associated with the Westernmoor coal seam outcropping in the north of the site.
- Based on the available information, unrecorded old workings are unlikely but cannot be discounted entirely.
- The risk of ground gas associated with the South Wales Upper Coal Measures (and historical landfill off site) will be investigated further.
- A scope of ground investigation would be developed to assess for the presence of shallow coal seams and mine workings.

The Land Contamination Reports (Phase I and II Geo-Environmental Desk Study Reports) and Coal Mining Risk Assessment are submitted in support of the planning application. Overall, it is considered that in relation to ground conditions the proposed development fully accords with **Policy AW 10**.

6.3.12 Utilities and Waste

Evidence that the development can meet all its service requirements (water, gas, electricity and drainage) has been submitted in support of the application through a Utilities Plan.

The existing foul drainage discharge from the school building is collected in a combined drainage network and conveyed beyond the northern site boundary. It is anticipated that the outfall is into the Nant yr Aran watercourse.

It is proposed to install a foul drainage network and form a new connection to one of the nearby DCWW combined pipe networks.

In terms of storm drainage, surface water runoff generated from impermeable areas of the proposed development can be collected via rainwater pipes, combined kerb drainage, gullies, linear drainage channels, swales and raingardens with kerb inlets; and these SUDS features would be strategically placed within the proposed drainage plan. For example, proposed Bioretention close to the school building and proposed Detention Basin in the south section of the playing field.

Rainwater harvesting has been proposed. Soakaway tests have also been proposed to confirm site permeability. If the site does not have sufficient permeability, alternative solutions will be required. The storm drainage is proposed to outfall into the Nant yr Aran as per the existing scenario.

In terms of water quality, pollution control would be achieved by the development through pollution prevention, interception and treatment implementing SUDS that use a range of treatment processes to reduce contaminant levels in the runoff.

The Utilities Plan submitted with the planning application demonstrates the service requirements for the school are in line with **Policy AW 2**.

7 Conclusion

An application for full planning permission has been submitted to RCT for the proposed re-development of the Llanilltud Faerdref Primary School and grounds to develop a new net zero carbon in operation educational facility, to include 2no. MUGAs, play and amphitheatre spaces, car and cycle parking infrastructure, SUDs, biodiversity and landscaping enhancements.

With reference to the planning assessment in Chapter 6, it is considered that the proposed development accords with the relevant policies of Future Wales and the adopted LDP.

Moreover, it is considered that the proposed development accords with the relevant policies of **PPW11** which forms a material planning consideration.

For these reasons it is considered that the many positives of the development outweigh the limited harm identified and the application accords with the Development Plan as a whole. As such, the Applicant respectfully requests that planning permission be granted accordingly.