WEPCo & Rhondda Cynon Taf County Borough Council

MIMWEP - Pontyclun Primary School

Planning Statement

RH0201-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.

Job number 281143-00

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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 Pontyclun Primary School, located to the south of Palalwyf Avenue, Pontyclun CF72 9EG, 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 and Inclusion Services Directorate as joint Applicant.

The site comprises the buildings of Pontyclun Primary School and its grounds, comprising seven existing buildings: a main hall; six separate buildings with classrooms and ancillary spaces; an asphalt surfaced playground and car park.

This Statement describes the need for development, the site context, details of the proposed development and assesses this against relevant 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 redevelopment of the Pontyclun Primary School site to develop a new primary school ('the proposed development').

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

- Demolition of the existing school buildings and the provision of temporary classroom accommodation during construction;
- Provision of a Net Zero Carbon in operation school including nursery and primary provision;
- 1no. main school building organised over two storeys, to include classrooms, "heartspaces", administrative spaces, main hall and kitchen;

- External areas and facilities, to include landscaped areas, an outdoor canopy, outdoor seating, hard and soft playgrounds and a potential trim trail;
- 1no. Multi-Use Games Area (MUGA), comprising 2no. courts;
- 2no. car parking areas with capacity for 43no. car parking spaces, including 2no. disabled persons spaces;
- 30no. covered Sheffield cycle stands;
- Refuse and waste collection facilities; and
- Erection of two temporary accommodation buildings, to host 12no. classrooms during construction, organised over two storeys.

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 and Inclusion Services Directorate 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 the Welsh Ministers, tasked with delivering new schools and colleges on behalf of local authorities and Further Education institutions across Wales. Arup, together with Lead Designers Sheppard Robson Architects, has been appointed by the joint Applicant to lead a multi-disciplinary team to develop and submit proposals for the proposed redevelopment of the Pontyclun Primary School.

1.4 Need for Development

Pontyclun Primary School comprises seven buildings; the original school was built of traditional methods in 1923. There is a 1950s canteen building that has been recently converted to provide stand-alone teaching space. The infant block is of CLASP construction and known to contain significant levels of asbestos. In the late 1990s, new accommodation was constructed in the form of a hall and an administration block. There are also two temporary classrooms on site, one of which is a 1940s HORSA building. A playground area surrounds the buildings.

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.

It is proposed that new school buildings would replace the existing buildings onsite, the new school would consist of one building thereby ensuring that children are provided with brand new 21st Century flexible learning environments under one roof.

By providing a new school building and ancillary facilities, the proposed development would deliver space for 540 students aged 3-11 (480 students aged

5-11, plus 60 FTE place nursery); and would have a capacity of 38 teaching staff plus 11 non-teaching staff. The current number of pupils enrolled at the school include 498 pupils plus 57 nursery places. The new proposals will be able to meet existing needs while providing additional capacity to cater for increased demand likely to arise in an area of rapid housing development.

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

- Improving sports facilities, the quality of external play spaces and providing purpose-built specialist educational areas for ICT;
- 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 October 2023.

2 The Site

2.1 Site Location

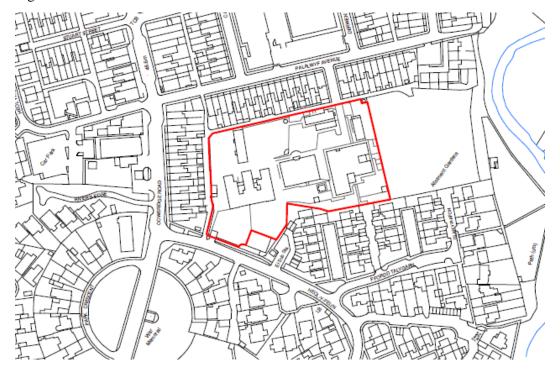
The application site for the proposed development comprises the grounds of the Pontyclun Primary School, Palalwyf Avenue, Pontyclun CF72 9EG. The site is located to the south of Cowbridge Road (A4222), which provides the main route through Pontyclun north to south.

The site location is shown on the Site Location Plan submitted in support of this planning application and in Error! Reference source not found. below. The application site equates to approximately 11,700sqm and is located within the settlement boundary of Pontyclun. 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 and south off Cowbridge Road, Heol-Y-Felin and Palalwyf Avenue, which backs onto the site; and allotment land leading on to open countryside along the River Ely to the east.

The current land use is the Pontyclun Primary School and its grounds, comprising seven existing buildings: a main hall; six separate buildings with classrooms and ancillary spaces; and asphalt surfaced playground and car park. The existing main school building was constructed in 1923. The existing site context is shown on the Site Layout Plan submitted in support of this planning application.

Figure 1 Site Location Plan



2.2 Site Context

2.2.1 Access

The main vehicular access to the site is gained off Heol-Y-Felin which connects to Cowbridge Road to the north. Additional vehicular and pedestrian access to the site is also located at a narrow entrance from Palalwyf Avenue to the east of the site. This access lane is shared with the school and residents of Palalwyf Avenue. Other pedestrian entrances exist off Heol-Y-Felin at the west, off Palalwyf Avenue to the north east and off Ffordd Talygarn at the south west of the site boundary.

The site is not situated near any National Cycle Network routes. Those currently cycling to school (staff, parents and pupils) are assumed to do so along the existing road network. In addition, there is no cycle parking provision at the existing school, which limits the potential for pupils, parents and staff to travel to school by bike.

The nearest bus stop to the site is located on the highway on the southern side of Cowbridge Road, situated 30 metres to the north east of the site boundary. This is served by the Number 64 bus route that runs between Bridgend to Talbot Green, the Number 321 bus route that runs between Talbot Green and Llantwit Major Bus Station and the Number 404 bus route that runs between Pontypridd and Talbot Green.

Pontyclun Railway Station is located approximately 450m to the north east of the site and can be accessed via the station approaches off the A4222 (Cowbridge / Llantrisant Rd). The station is part of the South Wales Main Line, located between Swansea and Cardiff. Cardiff Central and Swansea Stations provide services to a wide range of destinations including Newport, Bristol and Cheltenham Spa.

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:

- A Special Area of Conservation (SAC) is identified within 10km of the study area: Cardiff Beech Woods (circa 7.4km north-east of the site).
- Two national statutory designations are identified within 3km of the site: Ely Valley Site of Special Scientific Interest (SSSI) (circa 1.5km south-east of the site) and Llantrisant Common and Pastures SSSI (circa 2.8km north of the site).
- A Site of Importance for Nature Conservation (SINC), Forest Fach Farm, was identified within 2km of the site (circa 1.3km to the south of the site).

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 allotment land. The site is bound to the west and north by a public access lane, to the east are allotments and to the south, residential housing and a library with associated car parking.

The site is located within the Pontyclun settlement boundary, a village located within the south of the borough of RCT. Pontyclun contains a Local and Neighbourhood Centre on Cowbridge Road to the north of the application site. Retail and food and drink establishments (A1 and A3 Use Classes) are concentrated within this centre.

The village is predominantly residential, with development focused to the south of Cowbridge Road. Other key land use features include Pontyclun railway station to the northeast of the site; Pontyclun Community Centre to the north of the site; Pontyclun Park and Pontyclun FC to the west and south west of the site.

To the south of the site is allotment land leading on to open countryside along the River Ely to the east.

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 Forest Fach Farm SINC, circa 1.3km to the south of the site.

The application site is predominantly characterised by hard surfacing, however a semi-improved and amenity grassland containing trees, scrub and ornamental planting is located within the east of the site.

2.2.5 Cultural Heritage

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

In addition, while the existing original school building dates to 1923, it is not statutorily listed nor listed as part of a Local List.

2.2.6 Ground Conditions

In terms of general topography, the site slopes at a shallow gradient from north east (+47m AOD) to south west (+44.87m AOD).

The application site is located within the Coal Authority (CA) reporting area however, it not located within a high-risk development area of a CA surface coal resource area. As such, a Coal Mining Risk Assessment is not required for the proposed development.

A Phase I Geo-Environmental Desk Study was undertaken for the site in 2019. and Phase II Geo-Environmental Ground Investigations (GI) were completed for the site in September 2021. Key findings from the GI undertaken at the site are as follows:

- The site is located within both a Low and High Probability Radon Affected Area. The requirement for radon protection measures may vary according to the location of any new buildings. At this stage full protection measures should be assumed until a bespoke report can be prepared for the site once the new development location is known.
- Made Ground is not indicated within the site boundary on the published geological mapping. However, given the sites development Made Ground deposits may be encountered upon the site.
- Three historical landfill sites have been recorded within a 250m boundary of the site.

The Phase II Geo-Environmental Ground Investigations concluded that it is anticipated, following completion of treatment works, the development can proceed without undue ground risks.

2.2.7 Hydrology

The new Flood Maps for Planning shows that the entirety of the application site is located within Flood Zone A, an area with a low probability of conjectural tidal/fluvial flooding.

Existing drainage features for the site are detailed in Appendix B of the Drainage Strategy, which is enclosed with the planning application.

Sustainable Urban Drainage (or SUDs) will be required at the site and the discharge rates would need to be agreed to inform the level of attenuation required on the site. A meeting with the RCT SUDs Approval Body (or SAB) Officer was held on 30 March 2021 where the existing drainage strategy was presented and discussed along with preliminary proposals.

2.2.8 Foul Drainage

Public sewer records indicate 2no. combined 225mm dia. sewers along the north and east site boundaries and a rising main to the south.

The existing school buildings at the site are served by a private foul drainage network. An initial pre-development application has been submitted to Welsh Water to confirm the proposed foul drainage connection point and if a Hydraulic Modelling Assessment is required.

Each of the school buildings has at least one foul drainage outlet which eventually outfalls into the Welsh Water combined sewer that is located outside of the site boundary to the west and north. The peak flow generated from the development has been estimated as 3L/s, assuming 619 persons per day. An allowance for an expansion of 30 additional pupils has been accounted for in this assumption.

2.2.9 Storm Water Drainage

The storm water strategy would account for the water quality of the discharge into the watercourse in accordance with guidance¹. Pollution control would be achieved through prevention mechanisms, interception and treatments implementing SUDs to manage and treat surface water runoff.

2.2.10 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. The Existing Drainage and Utilities Plan submitted with the planning application, shows the existing drainage features and utilities located within the site.

Services are located across the whole site area to serve the existing school buildings. The main incoming route of the services is the north western site entrance on to Palalwyf Avenue however, there are also incoming/outgoing services on to Heol y Felin west of the existing library and Ffordd Talygarn in the south eastern part of the site. There are also connections to the utilities across the western site boundary including foul drainage and gas. Utilities also cross between some of the school buildings.

An underground 11kV electricity cable runs from the Palalwyf Avenue site entrance to the centre of the southern site boundary. This electricity cable will likely have an easement/wayleave which will restrict the allowable works within the easement. Running outside the western and northern perimeter of the site in the surrounding access lane are a 125mm gas pipe and a DCWW combined sewer pipe.

The ground investigations conducted to date indicate the application site to be located within a High Probability Radon Area. Radon protection measures are likely to be required through the detailed design and delivery stages.

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
00/2451/10	Decision Issued	Installation of double mobile classroom terrapin structure.	Planning Application	24/07/2000	Approved

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¹ Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems (2018).

Ref. No	Status	Description of proposal	Application type	Decision issued date	Decision
01/3079/10	Decision Issued	Proposed new vehicular access off Heol-Y-Felin	Planning Application	15/02/2002	Approved
05/1804/10	Decision Issued	Proposed new main hall with ancillary support rooms	Planning Application	13/12/2005	Approved

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 lists 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 locations 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

RCT provided email correspondence in relation to initial proposals on the 19 May 2021. This is provided in full detail within the Appendix A of the Transport Statement, and is summarised as follows:

- Submission of a Transport Statement is acceptable for proposals subject to consideration/inclusion of information quoted (user hierarchy audit; accident analysis; policy review; traffic assessment; guidance on parking provision requirements; safer routes to school audit).
- Confirmation of the requirement for a Framework Travel Plan and Parking Study.
- Support for development of a Framework Construction Traffic Management
- Comments that any transport statement / planning application should include consideration of the following:
 - Number of staff, pupils and ancillary staff for existing and proposed, times of operation, provision of pre-school/or afterschool activities e.g. breakfast club, afterschool club, afterschool activities etc., details of any community use.

- 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.
- 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.
- 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.
- 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.
- 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.
- Any secondary accesses for maintenance.
- Swept paths must be provided for catering and waste vehicles.

SUDS Approving Body

A meeting with the RCT SUDS Approval Body (SAB) Officer was held on the 30 March 2021. The following matters were discussed/confirmed:

- On the current school site, storm water is collected through pipework and outfalls into a sewer located in Heol y Felin. The existing utility plans imply two outfall points.
- Presence of existing hard landscaping within buildable area with possibility to use permeable paving as a method of collection and for treatment of external hardstanding runoff.
- The opportunity to use green spaces as green drainage solutions and also as educational tools.
- Due to the site constraints, sufficient area allowance for attenuation should be made at an early stage.
- Attenuation cells may be required due to site locations and the constrained access points, which align with the possible attenuation location.

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

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/pontyclun/).

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 redevelopment of the Pontyclun Primary School site to create a new Net Zero Carbon in operation educational facility.

The new primary school would accommodate 540 students aged 3-11 (480 students aged 5-11, plus 60 FTE place nursery); and would have a capacity of 38 teaching staff plus 11 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 located within the centre north of the site, adjacent to the existing main entrance of Heol-Y-Felin. It would comprise a two-storey building and have a gross internal floor area of approximately 2966sqm.

The new school building would be organised over two storeys with two nursery rooms, two reception classrooms, five infant classrooms and nine junior classrooms. Learning spaces would be designed in four 'clusters', two for nursery/infants on the ground floor and nearest the main entrance and two for juniors on the first floor.

Kitchen and other service deliveries would access the site separately from and adjacent to the main pedestrian access.

There would be a secure entrance zone, with admin and community spaces on the 'public-facing' side of the secure line. Direct, controlled parental access to nursery and reception classrooms close to the main entrance would be maintained.

The layout of the proposed development is as shown on the indicative floor plans in

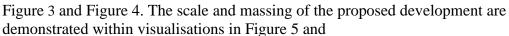




Figure 6.

Sections of the proposed development are set out in Error! Reference source not found. and Error! Reference source not found.

Further design detail for each element of the proposed building(s) is articulated under the subsequent sub-headings.



Figure 4 Proposed First Floor Plan



Figure 5 Proposed visualisations from the north east elevation



Figure 6 Proposed visualisations from the west elevation



Figure 7 Proposed "Heart Spaces" Section



Figure 8 Proposed Circulation and Infant Classroom Sections



4.2.2 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.

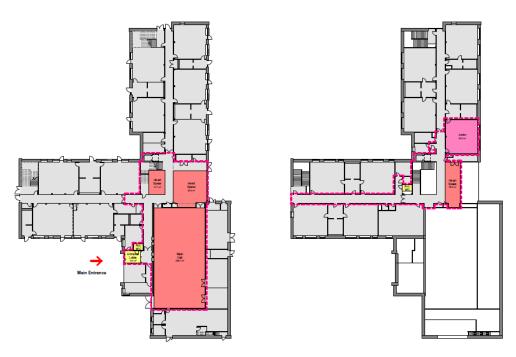
The Wellbeing for Future Generations Act and the UN Sustainable Development Goals (SDGs) are central to the Applicant's strategy and projects. WEPCo have ambitious plans for a Social Value programme that supports Wales and Rhondda Cynon Taf Social, Economic, Environmental & Cultural priorities.

Several areas would be zoned in terms of layout, security, services and access, such that they can be accessed externally and used by the community without compromising the security and operation of the rest of the building. Proposed hours of use for the development include: 08:00-20:00 Monday to Fridays; and 08:00-13:00 on Saturdays.

Areas that would be accessible are depicted on the Out of House Use Ground and First Floor Plan in Figure 9 below and submitted with the planning application.

On the ground floor, these areas would comprise the main hall, entrance lobby adjacent to the main entrance, an accessible toilet, and the two "heart space" areas. Within the first floor, these areas would comprise the "heart space", an accessible toilet and one junior classroom.

Figure 9 Out of Hours Ground and First Floor Plans



4.2.3 Sports and Recreational Facilities

The sports and recreational 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 proposed footprint and layout of the school building provides opportunity to create much improved external spaces for the school and key stages over the existing provision encumbered by the scattered layout of buildings on the site; and the building facade itself would form part of a natural secure line within the site to separate publicly accessible areas of the site, such as the car park from the external pupil sport and social spaces.

The school sports and recreational facility provision would be located to the west, east and southeast of the main school building and would comprise a two-court multi-use games area, other informal hard play spaces and landscaped soft play spaces.

The provision has been designed in accordance with the relevant national Building Bulletin frameworks developed by Central Government². BB103 (Area guidelines for mainstream schools) sets out that for primary schools, the minimum area of hard outdoor PE space is 400sqm, for soft informal and social areas 600sqm, and hard informal and social area 200sqm.

MUGA

The 2no. MUGA courts would be 18.5 x 37m each and located within the southeast of the site. The MUGA would be a fully fenced two court macadam MUGA located on the south west boundary of the site and would accommodate a variety of sports including football, basketball and tennis. The MUGA would be accessible via the new pedestrian access created off Ffordd Talygarn at the western boundary.

Other External Spaces

The external play areas would consist of a mixture of hard and soft areas located in the surrounds of the main school building.

The nursery play area would be located adjacent to the main entrance and western elevation of the main school building. Nursery and Reception external play areas would be segregated with low fencing. An external secure and waterproof toy store would be provided as a shared resource for larger pieces of play equipment that may be used inside and outside of the classrooms. External play areas in this location would only be accessible via the infant classrooms, not the main pedestrian or vehicular entrance off Heol-Y-Felin.

For the infant pupils a Key Stage 1 play area would be located in the northeast of the site and with direct access from infant classrooms. The external soft and hard

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² Area Guidelines for Mainstream Schools BB103 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/905692/BB103_Area_Guidelines_for_Mainstream_Schools.pdf

play area for each classroom would be provided with a minimum of 20sqm of covered area which would be a minimum of 3m deep. A freestanding external canopy of 60sqm would be provided and located remote from the building, at a minimum of 10m away. This area would also be accessible via the pedestrian entrance at the northeast of the site, off Palalwyf Avenue.

A large area of hard and soft play areas for Key Stage 2 pupils would be located to the south of the main building and comprise, outdoor seating and an outdoor canopy area alongside landscaped areas for informal recreation. This area would also be accessible via the pedestrian entrance at the southeast of the site, off Palalwyf Avenue.

A potential outdoor trim trail and horticultural area within the junior soft play areas are also being explored. Ponds would not be provided within the grounds of the proposed development.

Play areas across the proposed development site would comprise hard surface finishes (a combination of macadam and wet pour surfaces), grass areas, planting and trees.

4.2.4 Access and Movement

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 located in four locations: a new pedestrian main entrance off Heol-Y-Felin located to the north west of the site; a secondary pedestrian access at the north east of to the site off Palalwyf Avenue; a secondary access at the south east of the site off Palalwyf Avenue; and a secondary access Ffordd Talygarn for accessing the MUGA at the south of the site.

Access to the ground floor classrooms would be through a shared cloaks/space shared between two classrooms with shared toilets also accessible from these entrance spaces. These entrances would also be used at the start and end of the day by parents as the main access for pupils. Access to first floor junior classrooms will be by a lobby and staircases, with pupils accessing at the start and end of day through these entrances.

Vehicular Access

A new vehicular access would be achieved from the west of the site only via a priority T-junction arrangement with Heol-Y-Felin which runs along the western boundary of the site. Therefore, access for vehicles would no longer be achieved from Palalwyf Avenue from the east of the school. This would ensure that pedestrians and cyclists are prioritised over vehicular traffic and that segregation is achieved between motorised traffic and active travel users to enhance safety.

Vehicular Parking

A total of 43no. car parking spaces are proposed in the main car park, including 2no. spaces reserved for Blue Badge holders, which aligns with the 2% requirement prescribed by RCT. Marked visitor bays would be provided within the quantum of the proposed parking provision. Electric vehicle charging would be provided at a rate of 10% active charging which accords with PPW11.

Cycle Parking

In line with the access strategy and hierarchy of users, adequate parking provision for cyclists would be provided within the development. Based on the RCT cycle parking standards, a total of 42no. cycle parking spaces would need to be provided. To promote cycling as a transport mode for staff and pupils and cater for future demand, it is proposed to provide 30no. covered Sheffield style stands as part of the development, providing storage for up to 60no. cycles.

Cycle parking would be located to the north of the proposed school entrance, directly adjacent to the shared pedestrian and cycle access, which leads from Heol-Y-Felin to the west of the school. 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.

Servicing and Delivery

A service and delivery yard plus bin store would also be located adjacent to the car park and south of the main school building. Provision of bin storage would include for storage of recycled materials.

Servicing of the site could be undertaken on-street from Heol-Y-Felin with a bin store proposed to be located within close proximity of the vehicular access point to reduce potential conflict with staff travelling to/from school by car.

4.2.5 Sustainability

A key design principle driving the proposed development includes efficiency and net zero carbon measures. The proposed development is anticipated to achieve, at a minimum, an 'Excellent' BREAAM rating. In addition, the proposed development has been designed to meet a strict operational net zero carbon target, whereby all operational energy consumed on site (both regulated and unregulated) shall be generated by an extensive roof mounted solar photovoltaic (PV) array.

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 6.3.2.

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 is similar to the existing, with the main school building proposed within the north of the site and the retention of an existing entrance approach off Heol-Y-Felin. The design layout 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 and increase overall biodiversity.

Biodiversity enhancements proposed across the site would also ensure that the proposed development would maintain permeability through the local network of gardens, allotments and green spaces.

Circa 9no. trees would be retained at the site, including those located along the eastern site boundary. 5no. would be removed in the south east and south, adjacent to the proposed MUGA. New additional tree planting is proposed around the site, to the sum of 51 no. trees. Additional tree, hedge and shrub planting proposed around the main school building and other areas of the site including the site perimeter would act as a natural screening and be in accordance with the Planting Strategy, which is submitted with the planning application.

New areas of planting proposed to the east of the main car parking area would function as a dry attenuation area, to capture and treat surface water run off within the site. This would connect to the site wide SUDS network, comprising rain gardens and other biodiversity features, as detailed in Section 4.2.8 below.

4.2.8 Drainage

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:

- Attenuation earthworks across the site.
- Existing connection to foul sewer to be reused for discharge of proposed foul flows where possible, to be confirmed by Welsh Water.
- Rain garden or slow drain to intercept run-off from the landscaping, proposed at the north east of the site.
- Approximately 60sqm of bioretention features around the proposed school building perimeter.
- 20sqm attenuation basin with connection to 140sqm cell to attenuate flows from the school northern roof areas and surrounding hardstanding.

Existing surface water outfall to be reused for discharge of proposed surface water flows if possible. Ultimate outfall connection point unknown, to be confirmed through further survey. 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 Temporary Accommodation

To ensure the school is remains fully operational throughout construction it will be necessary to provide temporary accommodation to re-provide for the classrooms lost due to the demolition of the original school buildings during the first phase.

The temporary accommodation will comprise of twelves classrooms across two double storey buildings, to accommodate the ten classrooms and two ancillary rooms displaced by initial demolition activities. These would be located within the west and south of the site.

As set out within the Temporary Site Wide Masterplan in Figure 10Error! Reference source not found. Error! Reference source not found. below, there would be a clear separation of works from the operation of the school during the initial build period and demolition phases to minimise impact on the school's operation.

The temporary accommodation would be of a standard to enable full curriculum teaching and provide appropriate heating, ventilation, lighting, ICT services, and safe access. Accessible WC facilities would be provided (temporary drainage connection or tanked). A full dining hall and kitchen facilities would be available throughout in existing school buildings unaffected by the initial demolition.

To ensure minimal disruption to the operation of the school, a detailed internal specification would be agreed with the school and contractor(s) during the

appropriate phase and implemented in accordance with any future planning consent.

Figure 10 Temporary Site Wide Masterplan



4.2.10 Construction

It is intended that the delivery of the campus would be phased, with Pontyclun Primary School continuing to operate from the site during the construction of the new building, through use of temporary accommodation. A demolition strategy would be developed by the Main Contractor, once appointed.

List of Plans and Documents 4.3

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
RH0201-SRA-00-00-DR-A-02000	Site Location Plan

RH0201-SRA-00-00-DR-A-02001	Site Layout Plan
RH0201-ALA-00-XX-DR-L-00019	General Arrangement Plan 1 of 2
RH0201-ALA-00-XX-DR-L-00020	General Arrangement Plan 2 of 2
RH0201-SRA-01-01-DR-A-02100	General Arrangement Ground Floor Plan
RH0201-SRA-01-01-DR-A-02101	General Arrangement First Floor Plan
RH0201-SRA-01-01-DR-A-02102	General Arrangement Roof Plan
RH0201-SRA-01-ZZ-DR-A-02400	Out of House Use Ground and First Floor Plan
RH0201-SRA-01-XX-DR-A-02200	Elevations
RH0201-SRA-01-XX-DR-A-02300	Sections AA, BB, CC, DD
RH0201-SRA-01-ZZ-IM-A-02802	Bay Study Typical Two Storey
RH0201-SRA-01-ZZ-IM-A-02800	Aerial View Looking North West
RH0201-SRA-01-ZZ-IM-A-02801	Ground Level View Entrance
RH0201-SRA-01-ZZ-IM-A-02851	Internal View Heartspace View
RH0201-SRA-01-ZZ-IM-A-02852	Internal View Heartspace Section
RH0201-SRA-01-ZZ-IM-A-02850	Internal View Entrance Corridor
RH0201-ALA-00-XX-DR-L-00014	Outline Levels
RH0201-ALA-00-XX-DR-L-00005	Landscape Illustrative Masterplan
RH0201-ALA-00-XX-DR-L-00021	Temporary Site Wide Masterplan
RH0201-ALA-00-XX-DR-L-00013	Planting Strategy
RH0201-ALA-00-XX-DR-L-00007	Fencing and Security Strategy
RH0201-ALA-00-XX-DR-L-00008	Access and Circulation
RH0201-ARP-ZZ-00-DR-C-00021	Existing Drainage and Utilities Plan

RH0201-ARP-ZZ-00-DR-C-00081	Proposed Utilities
RH0201-ARP-ZZ-00-DR-C-00041	Proposed Drainage
RH0201-ARP-ZZ-00-DR-C-00031	External Finished Levels
RH0201-ARP-00-XX-DR-L-00022	Landscape Visualisations

Documents

- Application Forms and Certificates
- Arboricultural Impact Assessment
- CIL Form
- Design and Access Statement
- Drainage Strategy
- Ecological Impact Assessment
- Ground Investigation Reports
- PAC Report
- Noise Impact Assessment
- 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 6 – Town Centre First: "Significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region."

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."

The application site is located within the Cardiff, Newport and the Valleys National Growth Area. Policy 33 – National Growth Area – Cardiff, Newport and the Valleys outlines that "Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure... The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities."

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 polices 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:

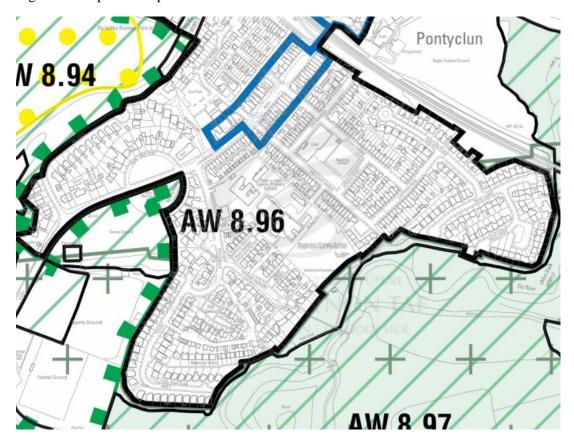
- The application site is located within the Pontyclun Settlement Boundary within the Southern Strategy Area (**Policy CS 2**), and is surrounded by residential development to the north, west and south, and allotment land to the east.
- Pontyclun is identified as a Local and Neighbourhood Centre under Policy SSA 16.
- Policy SSA 20 safeguards land for Park and Ride / Park and Share provision at Pontyclun Train Station, located to the north west of the site.
- The site is located to the north of a Green Wedge ('Land between Llanharan, Llanharry and Pontyclun'), allocated under **Policy SSA 22**.
- The railway line to the north west of the site is safeguarded for rail network improvement under **Policy SSA 19**.
- Land to the west of the site. south of Tylegarw, Pontyclun, is safeguarded for mineral resources (sand and gravel) under **Policy AW 14.**
- The site is also located in proximity to several Site of Important Nature Conservation (SINCs) including Ty-Draw (Pontyclun floodmeadows) (**Policy**

AW 8.94); Cowbridge Road Playing Field (**Policy AW 8.96**); and Ceulan Farm (**Policy AW 8.97**).

The site has no other land use or planning designations but is surrounded by residential development to the north, west and south and allotment land leading on to open countryside along the River Ely to the east.

The relevant extract from the Proposals Map is in Figure 11.

Figure 11 Proposals Map extract



Constraints Map

The Constraints Map identifies a Special Landscape Area to the south and east **Policy SSA 23.3** (Ely Valley at Miskin). Areas to the south, west and east of the site are located within Flood Zone C2. No constraints are identified at the site.

The relevant extract from the Proposals Map is in Figure 12.

Figure Ground

Sylven Ground

Sylven

Figure 12 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):
 - o SPG 1 Design and Placemaking;
 - o SPG 3 Design in Town Centres;
 - o SPG 6 Nature Conservation;
 - SPG 8 Access Circulation and Parking;
- Planning Policy Wales, Edition 11 (2021);
- Building Better Places (2020);
- Technical Advice Notes (TAN):
 - o TAN 5: Nature Conservation and Planning;
 - o TAN 11: Noise;
 - o TAN 12: Design;
 - o TAN 15: Development and Flood Risk
 - o TAN 16: Sport, Recreation and Open Space;
 - o TAN 18: Transport;
 - o TAN 20: Planning and the Welsh Language; and
 - o 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, is illustrated within Figure 9.

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 the Pontyclun Primary School site.

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 and any coming forward within the emerging LDP, which form material planning considerations. 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 located within the Pontyclun Settlement Boundary within the Southern Strategy Area of the LDP. Pontyclun 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 application 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 as 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 settlement boundary, in close proximity to a number of public bus stops and is a 6-minute walk from Pontyclun train station. The site is therefore 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 or existing land 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 2** of Future Wales further outlines that the Welsh Government supports the sustainable growth and regeneration of towns and cities and that development should positively contribute towards building sustainable places that support active and healthy lives.

Furthermore, given the proposed development comprises the redevelopment of existing education facilities and primarily serves the settlement of Pontyclun, 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 Pontyclun 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 main school building to the north of the application site. Through optioneering and accounting for the site's constraints, two storeys were considered optimal for the site due to the proximity to operational school buildings and density of the existing site. The 'L' shape as the preferred design option is considered to provide an efficient, flexible and adaptable building form.

The proposed design is considered to respond well to site context, buffering classrooms away from the main road (Cowbridge Road) through placement of a car parking area and through orientating classrooms to the rear of the building.

The design layout would also respect a substantial separation distance to surrounding properties. Facades with higher potential for noisier activities would also be positioned away from dwellings.

In addition, with the siting of the soft play areas, MUGA and hard playground space at the rear of the main building, the site layout would maximise the area of uninterrupted open and landscaped space on the site, to provide more expansive views of the grounds from the school buildings.

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.

The design approach for main school building has been explored and tested through optioneering and design stages based on consultation with the Applicant and technical structural and services requirements. This is detailed in full within the Design and Access Statement submitted with the planning application.

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 Typical Bay Studies drawings, these include:

- Brick façade (grey multistock) at the ground floor and gable ends of the school building wings;
- Aluminium standing seam roof that would continue down the face of the first floor level:
- Use of colour within window openings;
- Ventilation chimney with standing seam cladding (dark grey) & PPC louvres with a feature colour to be confirmed;
- External metal canopy with glazed roof and perimeter gutter;
- Photovoltaic roof panels.

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 AW 5** and **Policy AW 6**.

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 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 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 meeting safeguarding requirements, access from the lobby/reception area into the main school would be controlled by access control meeting 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 protected from vandalism and other crimes. Lighting would be controlled by photo electric cells or time switches and must complement and enhance the CCTV coverage on site.

In additional, crime prevention measures would be implemented for drainpipes, doors and windows to meet SBD standards.

Overall, the design has been developed to a degree 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 **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 4.2.5, 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 proposed on the roof of the main school building. 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.

6.3.3 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 located in three locations, to include an access off the north east of to the site off Palalwyf, Ave; via the existing entrance on Hoel-Y-Felin, located to the north west of the site.; and at the existing eastern boundary access off Palalwyf, Ave, which would be pedestrian only.

A total of 41 no. car parking spaces including accessible, electric vehicle charging and visitor parking bays would be provided as part of proposals, in accordance with RCT Access Parking and Circulation SPG. The proposals are therefore beneficial for the local road network as by increasing on-site car parking capacity, local on-street parking would be reduced.

The proposed layout as depicted on the Site Layout Plan would include as its main vehicular access the existing access off Cowbridge Road via Heol-Y-Felin. The site layout places an emphasis on pedestrians and cycles to ensure that the main site approach at Heol-Y-Felin is not dominated by vehicles. To help achieve this, the existing car park entrance would be relocated further south along the boundary to create a more direct approach to the proposed new school entrance. 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 outline potential mitigation measures that could be put in place to control movements in and around the school, to reduce the number of trips made to the new school by car and to manage car parking operations during pick-up and drop-off periods. School Travel Plan mitigation proposals include amongst others:

- A 'walking bus' scheme;
- Bicycle training courses;
- Local bike shop discounts;
- Car sharing; and
- Negotiating season ticket discounts with the bus operator for staff, or exploring free bus travel.

In conclusion, the Transport Assessment indicates that there are no transport or highways reasons to refuse the application. It is considered 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.

6.3.4 Residential Amenity

The application site is surrounded by residential properties to the north (off Cowbridge Rd), east (off Palalwyf Ave) and west (off Heol-Y-Felin and Ffordd Talygarn). Impacts for residential amenity have been considered throughout the design development, namely, siting, scale and massing of the campus building, and landscaping proposals that would provide natural screening.

The orientation of the proposed school building is such that it is set back from the rear access lane for properties to the north (off Cowbridge Rd) and east (off Palalwyf Ave).

The scale and massing of the proposed development in terms of footprint and height are considered appropriate for the site and surrounding context, whereby surrounding residential properties comprise terraced and semi-detached two storey houses. The proposed school building would also be two storeys in height, and been designed to ensure that the scale, massing and siting would not cause any issues of concern in relation to overlooking, overshadowing or overbearing of neighbouring uses.

Through locating the school building within the upper centre of the site and placing the car park between the residential dwellings off Heol-Y-Felin and Ffordd Talygarn, there would be sufficient separation distances and no adverse overshadowing or overbearing impacts for properties located to the north, west and east.

Proposed windows would not be directly facing those of residential dwellings located off Palawyf Avenue and Heol-Y-Felin. The main building external elevations on the end of each wing will contain doors on the ground floor only to ensure that there would be no overlooking issues for the rear gardens of neighbouring residential dwellings and vice versa. As such, proposals are compliant with **Policy AW 5** of the LDP.

The proposed development would also benefit from natural screening from retained mature trees in the southeast of the site, as well as additional planting at the north. This would serve a dual purpose of protecting residential amenity and limiting views into the site's external areas.

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 after school clubs, however, floodlighting will not be required. It is therefore considered that the light pollution impacts of the proposed development would be minimal and not dissimilar to the existing conditions at the site, in alignment with the policy requirements of **Policy AW 10** of the LDP.

In addition, the principle of proposed development would not cause issues with regards to residential amenity as the site is in use as a primary school and the site already includes existing sports facilities. Overall, it is considered that the impact upon residential amenity would be negligible given the existing and proposed land use.

6.3.5 Noise

A site-specific noise survey has been completed at Pontyclun Primary School to establish existing baseline noise levels. The following conclusions were made for the site:

- Site noise is dominated by road traffic on the A4222 (Cowbridge Road) and this is considered representative of the existing noise environment at the nearest noise sensitive receptors on Heol-y-Felin, Cowbridge Road and Palalwyf Ave.
- Building services noise emission limits have been set according to RCT
 Council requirements that the BS4142 rating level does not exceed 5dB below
 the existing background sound level.

The Noise Impact Assessment suggested building services noise emissions be incorporated into the conditions for the development, such as the following:

- An acoustic louver around the air source heat pumps.
- Ducted attenuators on the intake and exhaust connection of the Mechanical Ventilation with Heat Recovery (MVHR) units.

Full details of the assessment proposed development relating to noise are contained within the Noise Impact Assessment, submitted with the planning application.

6.3.6 **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 2019 and Phase 2 Ecological Surveys in April 2021, and these concluded that botanical species diversity is generally limited on-site and no notable species were identified.

Bat roost surveys were undertaken in August 2021 following Phase 2 Ecological Surveys. These confirmed the presence of an active roost within building B5, with the emergence of a Common Pipistrelle identified. Therefore, any works that may directly or indirectly affect this roost or use of this roost would need to be subject to ecological assessment and may require a European Protected Species (EPS) development licence from Natural Resources Wales (NRW).

As there was no evidence to show that other buildings B1, B3, B6, B7 or B8 on the Pontyclun Primary School site were being used by roosting bats, no additional mitigation is anticipated. However, in alignment with the report recommendations, any works affecting these structures would be considerate of the roosting potential and should evidence of roosting bats be found advice would be sought from ecologist with an NRW bat survey licence.

To demonstrate compliance with the Environment (Wales) Act 2016 and the RCT Nature Recovery Action Plan, recommended ecological enhancements for bats have been considered as part of the proposed design.

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 from an ecological perspective, the proposed development is considered to have limited impact on wildlife or habitats.

On-site ecological mitigation and enhancements are set out within the Ecological Appraisal, and include the following:

- Incorporation of native plants and those of wildlife importance into any landscaping scheme to provide foraging opportunities for birds, invertebrates and bats.
- Inclusion of diverse range of native and 'wildlife-friendly' plants in borders and rain gardens to increase habitat availability for invertebrates and birds
- A net increase in tree habitat at the site, including native trees suitable for the school setting
- Grassland areas will be managed to provide greater diversity of sward length and structure, for the benefit of invertebrates, small mammals and reptiles. Cut and collect will be used on short grassland areas to maintain low fertility (thus reducing the frequency of cuts) and benefiting diversity.
- A hedgehog 'house' will be provided within areas of long grassland/scrub in the east of the scheme, with hedgehog gaps along the boundary fence (c.

5x5inches) to maintain permeability through the local network of gardens, allotments and green spaces

- Two invertebrate hotels will be provided within areas of open space to provide overwintering/nesting opportunities for a range of species, as well as an educational resource for school pupils
- A range of bird and bat boxes will be provided at the Site, to comprise of:
 - Two bird boxes on retained trees
 - Seven bat boxes/tubes
 - Seven house martin nest cups under the eaves
 - Nine swallow nest cups beneath overhangs/covered areas
 - Eighteen swift bricks built into gable ends

Each of these mitigations and enhancements are included in the final proposed design and are set out within the Ecological Impact Assessment, Landscape Illustrative Masterplan and Planting Strategy, 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.

6.3.7 Landscape and Trees

The site is bound to the west and north by a public access lane, to the east are allotments and to the south, residential housing and a library with associated car parking. In terms of general topography, the site slopes at a shallow gradient from north east (+47m AOD) to south west (+44.87m AOD). Given the absence of statutory or non-statutory landscape designations covering the site, alongside continued use of the site as a school, site constraints assessment indicated that impacts on the surrounding landscape would be minimal.

As shown on the Planting Strategy Plan submitted with the planning application, a total of 5No. trees are proposed for removal, located around the area where the proposed MUGA would be sited in the southwest and in the southeast corner of the site. 9no. mature trees located within the central and eastern area of the site are proposed for retention. 51no. additional trees of native species would be planted within the site. Additional amenity and hedgerow planting are also proposed within the site boundary to act as natural screening features. Overall, the number of trees replaced would significantly exceed those lost through construction, in line with adopted **Policy AW 8** and **SPG6**.

The Arboricultural Report concludes that the proposed development is acceptable from an arboricultural perspective; and includes recommendations for an

Arboricultural Method Statement such as tree protection barriers and temporary ground protection.

The landscape enhancements that would be delivered as part of the proposed development are also outlined in the Design and Access Statement, Landscape General Arrangement and Landscape Illustrative Plan submitted with the planning application. The impacts of the proposed development on landscape and trees are presented in the Arboricultural Report submitted with the planning application.

6.3.8 Flood, Drainage and Hydrology

A Stage 1 Flood Consequences Assessment was conducted for the site in September 2019. It identified that the proposed development site contains no watercourses within its boundary; although it lies within an area categorised as Flood Zone A, an area with a low probability of flooding. Overall, it stated that there is no significant risk of tidal, fluvial or reservoir flooding at the site. Therefore, based on the proposed development's end use as a school, the siting of development within Flood Zone A is appropriate and compliant with **TAN15**.

The southern end of the application site includes localised areas of low and medium surface water flood risk. It is anticipated that surface water will require a restricted discharge, attenuation and quality controls (e.g., interceptor).

In accordance with **Policy AW 10**, SUDS are also included as part of the development proposals including bioretention features within external areas adjacent to the building; and other attenuation areas. A SUDs Application to the SABs Authority has also been submitted alongside the planning application to ensure compliance with relevant legislation.

6.3.9 Ground Conditions and Contaminated Land

The application site is located within the Coal Authority (CA) reporting area but is not located within a high-risk development area of a CA surface coal resource area. As such, a Coal Mining Risk Assessment (CMRA) was not required for the proposed development.

With regards to land contamination, a Phase I Geo-Environmental Desk Study Report and Phase II Geo-Environmental Assessment have been undertaken for the site, supported by recent field work in April and June 2021, which concluded that:

- The site is located within both a Low and High Probability Radon Affected Area. The requirement for radon protection measures may vary according to the location of any new buildings.
- Made Ground is not indicated within the site boundary on the published geological mapping. However, given the sites development Made Ground deposits may be encountered upon the site.
- The published geology indicates superficial deposits of Glacial Till and bedrock geology of Marros Group and Oxwich Head Limestone Formation.
- Three historical landfill sites have been recorded within a 250m boundary of the site.

Table 7 of the Phase II Geo-Environmental Assessment concludes that on and offsite risks are considered to be low.

The Land Contamination Reports (Phase I and II Geo-Environmental Desk Study Reports) 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** of the LDP.

6.3.10 Utilities and Waste

Deliveries and refuse collection at the proposed development would occur on-site, where a dedicated turning area would be provided for deliveries, servicing and refuse collection.

The Landscape Illustrative Masterplan, enclosed with the planning application, details how the proposed development has been designed to mitigate the visual and noise impact of the site on the surrounding area.

Further details of waste management are provided in the Design and Access Statement and Transport Assessment, enclosed with the planning application.

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

7 Conclusion

An application for full planning permission is to be submitted to RCT for the proposed redevelopment of the Pontyclun Primary School, including the demolition of all existing buildings, the installation of temporary classroom accommodation during construction, the erection of a new Net Zero Carbon in operation school building, school sports provision, vehicular, pedestrian and cycle accesses, car and cycle parking, landscaping, SUDs and associated infrastructure.

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.