

PLANNING, DESIGN & ACCESS STATEMENT

**Unit 6, Tafarnaubach Industrial Estate,
Tredegar, Blaenau Gwent**

December 2024

Ron Skinner
ESTABLISHED 1968
& SONS



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Description of development:

Full application for the demolition of the existing building, importation of inert material and associated works

Location:

Unit 6, Tafarnaubach Industrial Estate, Tredegar, Blaenau Gwent

Date:

December 2024

Asbri Project ref:

24.179

Client:

Ron Skinner & Sons



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SITE LOCATION



INTRODUCTION

Summary

1.1 The purpose of a Design & Access Statement (DAS) is to provide a clear and logical document to demonstrate and explain the various facets of design and access in relation to the site and to appraise the proposed development against relevant planning policies. It also presents the details of a planning application in a way that can be read both by professionals and the public.

1.2 The diagram to the left, extracted from Chapter 3 of Planning Policy Wales, summarises the five objectives of good design that should be taken into account when preparing a DAS. The circular nature of the diagram represents the equal weightings that need to be given to each of the 5 Objectives of Good Design: Access; Movement; Character; Environmental Sustainability and Community Safety.

1.3 The submitted Design and Access Statement adheres to guidance embodied in the Welsh Government publication, Design and Access Statements in Wales, published in June 2017. It also provides an appraisal of the development against the relevant national and local planning policies.

1.4 The statement is subdivided into eight sections, commencing with a brief summary of the site in section 2. whilst Section 3 provides an overview of the application's planning context (planning history and PAC). Section 4 discusses the design evolution of the proposal, while Section 5 interprets the opportunities and constraints of the scheme. The Planning Policy framework to which the development would be assessed against is contained within Section 6 before moving onto Section 7 which sets out the proposal, explores the relevant design and access facets associated with the application and provides an assessment of the site against the key planning policies. The document then concludes, under section 8.

Project Brief & Vision

1.5 This application has been prepared by Asbri Planning on behalf of Ron Skinner & Sons in support of their full planning application for the proposed demolition of the existing building, and the importation of inert material, together with associated works.

1.6 Ron Skinner and Sons have projected an increase in turnover and staff numbers (from approximately 128 to 160)

and require additional forecourt capacity at their operations in Tafarnaubach Industrial Estate. Accordingly, in 2018 the company imported approximately 8000 tonnes of inert materials comprising of road planings to the site. The proposal at the time was to raise the site, which sits at a lower elevation to the adjacent road, to reflect the same elevation as opposed to the tiered topography, thereby allowing articulated trailers to drive onto the site. However, NRW required the correct licenses to be obtained to demonstrate that the imported material was not contaminated and in order to ensure that the appropriate license could be secured, it was also necessary to apply for retrospective planning permission given the works constituted engineering operations.

1.7 The site was raised in an engineered fashion using imported soil and/or demolition material placed in accordance with Series 600 of the Specification for Highway Works. Soil samples were collected by TerraFirma in August 2018 on the stockpile left on the site and the results were issued to NRW for their approval. Alongside this, planning permission for the 'Retention of land reprofiling works through the importation of inert materials and the change of use from B2 (General Industrial) to Class B8 (Storage)' was obtained by Asbri Planning in December 2023.

1.8 Following the culmination of the above, there is still the need to increase the site levels to ensure that the site can be brought up to the adjacent road level, to allow transporters to be brought onto site. Therefore, it is necessary to submit another planning application for the importation of additional material onto site. It is expected that in order to bring the site to the same level as the adjacent road (366.590AOD) the equivalent of 23,261 tonnes of new inert material will need to be imported to site.

1.9 To maximise the site for its storage use, the existing industrial unit on-site is proposed to be demolished under this full planning application. This will allow Ron Skinner and Sons to redevelop the site to offer car sales storage; car transporter servicing and maintenance, as per the submitted plans.

Figure 8: Objectives of Good Design



SITE & SURROUNDING CONTEXT



SITE DESCRIPTION

General location

2.1 The application site is located to the north of the A465 (Heads of the Valleys Road), on Tafarnaubach Industrial Estate, Tredegar, on grid coordinates: X 312255 , Y 210464. The site is situated within the administrative boundary of Blaenau Gwent County Borough Council, approximately 3.5km to the north-east of Tredegar town centre.

2.2 The application site is relatively rectangular in shape, and measures approximately 2.3 Ha. The site increases in steepness towards the northern and western boundaries of the site.

Site Description

2.3 The land at the site is vacant brownfield land. A storage facility is located near to the eastern boundary of the site, with a heap of deposited material located south of this storage facility.

2.4 Both the northern and western boundaries of the site are defined by trees and shrubbery, while the southern and eastern boundaries of the site benefits from metal fencing - this ensures that the site is well secured at present.

2.5 The accompanying Tree Constraints Plan confirms the presence of three existing hedgerows along the site perimeter, which support Sycamore, Hawthorn, Hazel, Yew, Ash, and Elder species. These are all identified as Category C.

2.6 A review of the Welsh Government (NRW) Development Advice Maps for flooding confirms that the site is located within Flood Zone A, and is not considered to be at risk of flooding. NRW's Flood Map For Planning further ascertains that the site is not at risk of surface water, rivers, or sea flooding.

2.7 There are no listed buildings or scheduled monuments in the immediate vicinity of the application site. The nearest listed building to the site is Blaen y Cwm Viaduct (Grade II

listed; reference number 1860), located approximately 1km to the east of the site. The nearest scheduled monument to the site is the Afon Sirhowy Hut Circle (reference number MM347), located approximately 1.6km to the north of the site.

2.8 The existing building is a detached, single storey industrial building with a pitched metal roof. There are a number of clear perspex sheets on the roof to allow natural light into the building. The building is brick built to the lower half and metal clad with corrugated sheeting to the upper half. There is a large metal roller door to the southern elevation of the building. The building dates back to in excess of 30 years.

Access

2.9 Access to the site is limited due to the fencing and screening detailed above. Access onto the site is facilitated by a single entrance, which is situated on the Tafarnaubach Industrial Estate access road. This road facilitates two-way traffic (a single lane in each direction) and can accommodate heavy goods vehicles (HGVs) and can be accessed off the A465 Heads of the Valleys Road, a primary road network which travels along the north of the Blaenau Gwent County Borough.

2.10 In terms of pedestrian access, a pavement runs adjacent to the industrial estate access road along the site's western and southern boundaries.

2.11 The nearest bus stops to the application site are located on Merthyr Road, approximately 150m to the south-west of the site (Nag's Head Bus Stop; stop ID: blgawjg). This is served by the 4a, 4c and 78a bus services (operated by Stagecoach and Harris Coaches). There are no railway stations in close proximity to the site; the nearest being Rhymney railway station, situated approximately 5km to the south-west of the site.

2.12 A review of Welsh Government data on active travel indicates that the nearest identified active travel network is located approximately 300m to the north-west of the pre application site.

Surroundings

2.13 The site is immediately situated within an industrial area. To the east; north and west there is industrial land generally made up of factories; warehouses and vacant plots. The headquarters for the Ron Skinner and Sons business is located approximately 250m to the east of the site at Unit 4 Tafarnaubach Industrial Estate.

2.14 Beyond the industrial estate to the east lies the village of Nantybwhch and to the west, the village of Princetown. Immediately south of the A465 lies Parc Bryn Back and the towns of Rhymney lie to the south west and Tredegar to the south east. The wider landscape beyond these towns comprises open countryside with moorland; fields and pockets of woodland.

2.15 The nearest residential properties to the site are situated on Siloham Close, located approximately 100m to the west of the site, on the opposite sites of the access road to Tafarnaubach Industrial Estate.

SITE CONTEXT



PLANNING CONTEXT



1945



2001



2021

Planning History

3.1 Blaenau Gwent County Borough Council do not benefit from an online planning search facility, and as such a planning history review cannot be undertaken at this time. However, it is recognised that the following application was submitted by Asbri Planning on behalf of Ron Skinner and Sons in 2023:

- C/2023/0180 - 'Retention of land reprofiling works through the importation of inert materials and the change of use from B2 (General Industrial) to Class B8 (Storage)'. Approved December 2023.

3.2 This application regularised the previously imported material and secured the use of the site as a car sales storage. However, given that further materials are required to be imported to raise the site to the appropriate level, a subsequent planning application is to be submitted to Blaenau Gwent County Borough Council. This also includes the demolition of the existing building on-site.

Pre-Application Enquiry with BGCBC

3.2 The development has not been subject to any formal pre-application discussions with the relevant officers at Blaenau Gwent County Borough Council.

Statutory Pre-Application Consultation (PAC)

3.4 In accordance with Part 1A of 'The Town and Country Planning (Development Management Procedures) (Wales) (Amended) Order 2016" (DMPO 2016), all major developments are required to be subject of pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority.

3.5 Accordingly, a Pre-Application Consultation will be held between the 18th December 2024 and the 15th January 2025, where all statutory, community and 'other' consultees are invited to view the submission package and provide their comments. Further details on the PAC process and

comments are to be provided within the accompanying PAC Report and any alterations to the scheme, as a result of this consultation, will be included within the final Design and Access Statement.

OPPORTUNITIES AND CONSTRAINTS PLAN



PLANNING, DESIGN & ACCESS STATEMENT

INTERPRETATION

4.1 The concept for the development of the site has derived from the following:

- A full site analysis including a full desktop study of the site and its surroundings;
- A site visit and general visual assessment & planning appraisal of the site and surrounding area;
- Discussions with the client and a full understanding of the brief and vision of the project.

4.2 The above steps have presented the key opportunities and constraints for the site, which are outlined below and displayed on the constraints plan (left).

Strengths and Opportunities

- Settlement Boundary - the site lies within the settlement boundary of Tredegar. As such, it is located within an area where development is not normally permitted.
- Employment Allocation - the site is included within an allocated employment zone in the Blaenau Gwent Local Development Plan (primary employment area– LDP allocation reference EMP2.5).
- Industrial Context - the industrial context of the immediate surrounding area (in addition to the above employment opportunities brought on by a strategic employment allocation) provides opportunities to pursue developments of industrial and employment as opposed to other kinds of development.
- Access, Transport, and Active Travel - located in close proximity to the A465 Heads of the Valleys Road, one of the key transport corridors in the county borough. The site is also well served by the Tafarnaubach Industrial Estate access road, which is identified as a road for improving cycle routes within the Blaenau Gwent LDP (allocation reference T1.6).
- Previous Planning Approval - The principle of the importation of inert materials onto the site has been established, under application ref: C/2023/0180
- Visual Impact - the site's increased gradient to the northern and western boundaries of the site would

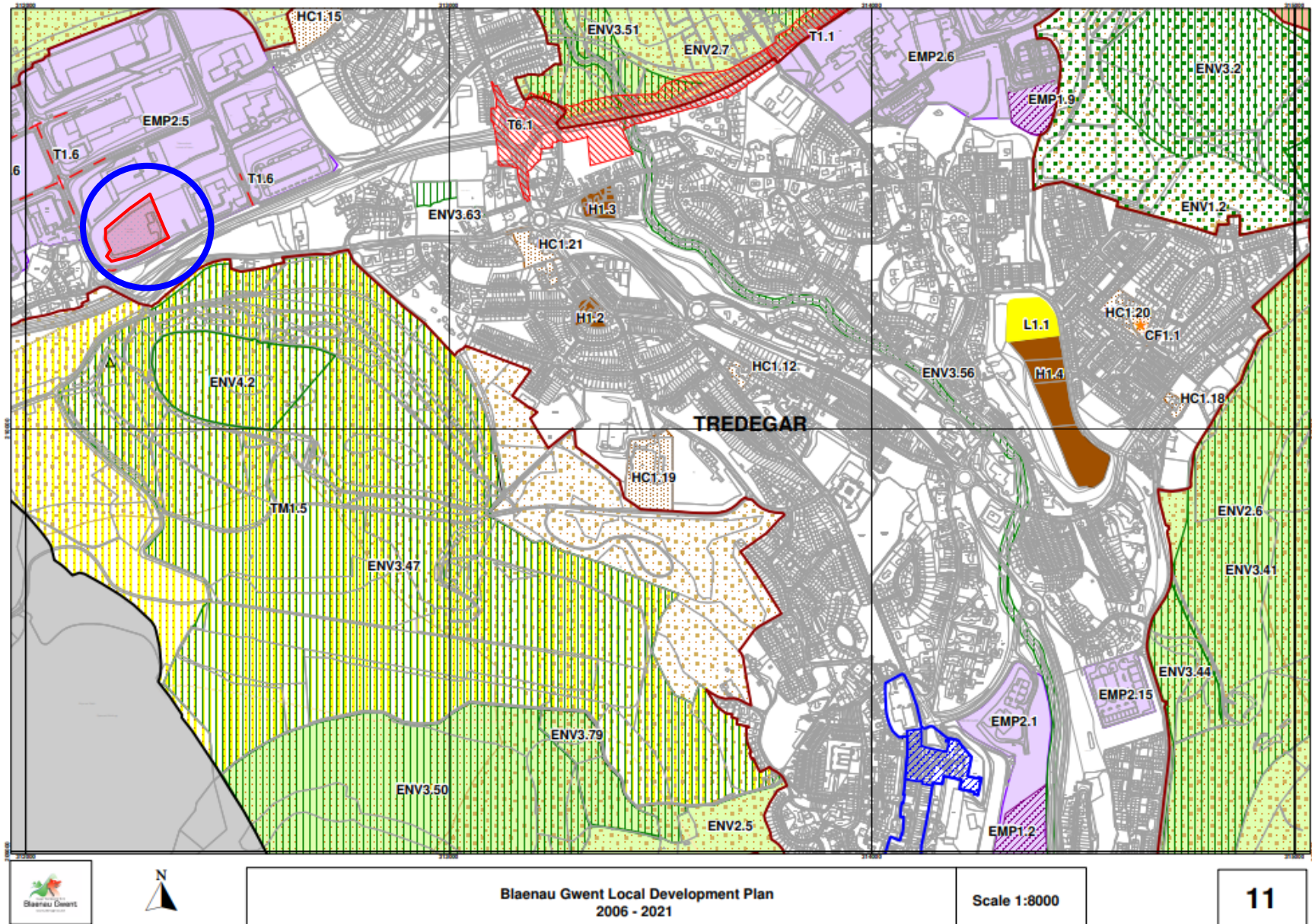
continue to provide sufficient screening for the site, ensuring that any landscape impacts generated would be reduced significantly.

- Public Rights of Way (PRoW) - there are no public rights of way crossing the site.

Constraints

- Topography - the gradient of the site decreases sharply further east across the site and it was set at a lower level to the adjacent road. As such, this posed a constraint for the safe movement of transporters and long-axle vehicles to enter the site.
- Ecology - the site is bounded by trees and dense shrubbery on its northern and western boundaries. These are all, however, located outside of the site location area and are to be unaffected. An industrial unit is located on-site which has been subject to an ecology survey.
- Contamination - As always with the importation of inert material, there is an element of risk associated with contamination.

BGCBC LDP PROPOSALS MAP EXTRACT



PLANNING POLICY: NATIONAL

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (Adopted February, 2021);
- The Blaenau Gwent Local Development Plan 2006-2021 (Adopted November 2012)

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

- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
- Relevant Blaenau Gwent County Borough Council Supplementary Planning Guidance (SPG)

5.3 This section of the Design and Access Statement provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this application.

National Policy

Planning Policy Wales

5.4 Planning Policy Wales (Edition 12, February 2024) Planning Policy Wales (PPW) is the Welsh Government's principal statement of national policy and sets out the land use planning policies that should be taken into account by local planning authorities in Wales and may be material to decisions on individual planning applications.

5.5 Paragraph 3.3 emphasises the importance of good design in development proposals, and states that it is fundamental to creating "sustainable places where people want to live, work and socialise".

5.6 Paragraph 3.55 of PPW states that "Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome".

5.7 Paragraph 6.2.12 of PPW (12th Edition) states that a Green Infrastructure statement should be submitted with all planning applications. This should "*be proportionate to the scale and nature of the development proposed*" and "*will describe how green infrastructure has been incorporated into the proposal.*"

Technical Advice Note

5.8 PPW is supplemented by a series of topic specific Technical Advice Notes (TANs), including the following which are of relevance:

5.9 Technical Advice Note 5 (TAN 5) Nature Conservation (2009) provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. Paragraph 4.1.1 refers to how the development control process can help achieve these objectives and supports identifying ways to build nature conservation into the design of new development and applying the five-point approach to decision-making - information, avoidance, mitigation, compensation and new benefits.

5.10 Technical Advice Note 12 (TAN 12) Design (2014) includes advice on how promoting sustainability through good design may be facilitated through the planning system.

The TAN sets out a diagrammatic 'route to good design' which encompasses an initial review of planning policy, a vision/aim, through to a continuous approval and collaboration stage which involves assessing design issues and pre-application discussions. This leads into the detailed design and the submission of a planning application and the development management process.

5.11 Technical Advice Note 18 (TAN 18) Transport (2007) contains advice on the location of development, parking design, walking cycling and public transport.

Wellbeing of Future Generations Act

5.12 The Well-being of Future Generations (Wales) Act 2015 came into force in 2015 and seeks to improve the social, economic, environmental and cultural well-being of Wales. The Act puts in place seven well-being goals in order to make sure that everyone works towards the same vision. The well-being goals are set out below and must be considered at an early stage in the design process.

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

Local Policy

Blaenau Gwent Local Development Plan 2006-2021 (2012)

5.14 The development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 is Blaenau Gwent County Borough Council's Local Development Plan (LDP) which was adopted in November 2012 and covers the period 2006 to 2021.

PLANNING POLICY: NATIONAL

5.15 Tafarnaubach Industrial Estate is identified as a Primary Employment Protection Area under Policy EMP2.5. As such, these sites are restricted to B1, B2 and B8 Use Classes, in addition to appropriate sui generis uses and appropriate ancillary facilities to service the employment uses within these Employment Protection Areas.

5.16 As such, the following LDP Policies are relevant to this proposal:

Policy Reference	Relating to
SP1	Northern Strategy Area
SP6	Ensuring Accessibility
SP7	Climate Change
SP8	Sustainable Economic Growth
SP10	Protection and Enhancement of the Natural Environment
SP13	Delivering Sustainable Waste Management
DM1	New Development
DM2	Design and Placemaking
DM10	Use Class Restrictions – Employment
DM16	Trees, Woodlands and Hedgerow Protection
DM18	Criteria for the Assessment of Mineral Applications
SB11	Settlement Boundaries
T1	Cycle Routes
T5	New Roads to Facilitate Development
EMP2	Employment Protection Areas

5.17 Policy SP1 ‘Northern Strategy Area—Sustainable Growth Area’ sets out how sustainable growth will be delivered across the northern area of Blaenau Gwent.

5.18 The County Borough Council’s approach to mitigating the impacts of climate change is set out within LDP Policy SP7 ‘Climate Change’.

5.19 Policy DM1 ‘New Development’ states that new development will ne permitted whereby they achieve appropriate measures relating to (inter alia) sustainable design, amenity, transport, scale, and access.

5.20 Policy DM10 ‘Use Class Restrictions - Employment’ states:

“In accordance with Policies EMP1 and EMP2, development proposals on major industrial areas will be subject to the following restrictions:

1. *On sites allocated as Strategic Sites, development will only be permitted if it is:*
 - a. *Within use class B1 and B2.*
 - b. *To provide an ancillary facility or service to the proposed employment use.*
2. *On sites allocated or identified as Business Parks, development will only be permitted if it is:*
 - a. *Within use class B1.*
 - b. *To provide an ancillary facility or service to the proposed employment use.*
3. *On sites allocated or identified as Primary Sites, development will only be permitted if it is:*
 - a. *Within use classes B1, B2 and B8.*
 - b. *An appropriate Sui Generis use.*

To provide an ancillary facility or service to the existing and proposed employment use.
4. *On sites allocated or identified as Secondary Sites, development will only be permitted if it is:*
 - a. *Within use classes B1, B2 or B8.*
 - b. *An appropriate Sui Generis use.*

- c. *To provide an ancillary facility or service to the existing and proposed employment use.*
- d. *An acceptable commercial service.”*

5.21 Policy EMP2 ‘Employment Protection Areas’ states:

“The following sites are protected for employment use, in line with their status in the employment hierarchy identified in Policy DM10:

2.5 - Tafarnaubach Industrial Estate”

Supplementary Planning Guidance (SPG)

5.22 The following Supplementary Planning Guidance documents adopted by Blaenau Gwent County Borough Council are also considered relevant to this planning application:

- Access, Car Parking and Design SPG (Adopted 2014)

THE PROPOSAL AND PLANNING APPRAISAL

Overview

6.1 To ensure that the development effectively responds to the local context, the principal considerations that will form the chapter, and to which the application will be assessed on, will be the five objectives of good design which are a set of principle considerations, as outlined in Technical Advice Note 12. These include an assessment of the proposed access, the overall character of the site including the amount, scale and layout, the appearance and landscape as well as the community safety and environmental sustainability of the site

Amount, Scale and Layout

6.2 Back in 2018 the company imported approximately 8000 tonnes of inert materials comprising of road planings to the site. However, there is still the need to increase the site levels to ensure that the site can be brought up to the adjacent road level, to allow transporters to be brought onto site. Therefore, it is necessary to submit another planning application for the importation of additional material onto site. It is expected that in order to bring the site to the same level as the adjacent road (366.590AOD) the equivalent of 23,261 tonnes of new inert material will need to be imported to site.

6.3 The importation of material will raise the levels across the site, up to the boundaries where it meets the 266.590AOD level. The area that will accept the new material is all hardstanding and is of low ecological value.

6.4 It is envisaged that the levels will be battered down along the north-eastern and eastern boundary, however, this will be discussed with the LPA.

6.5 As part of this full application, the existing industrial building on-site will be demolished in order to facilitate the raising of the site levels.

6.6 The proposed layout design demonstrates how the development will accommodate the following:

- Proposed access improvements increasing junction radius to 10m, accommodating car transporter vehicles.
- 10 x staff parking car parking bays (2.6m x 4.8m)
- 10 x car transporter parking bays (4m x 22m)
- 306 x vehicle storage bays for car sales (2.6m x 4.8m)
- Indicative transporter vehicle facility (to accommodate servicing and maintenance of transporter vehicles)

Access and Movement

6.7 The primary access into the site is off the Tafarnaubach Industrial Estate access road and will make use of the existing site access junction. This access is to be improved in terms of size and radius in conjunction with the proposed levelling up of the site and has been designed to accommodate all of the proposed vehicles to use the site, including car transporters.

6.8 All vehicles intended to use the site will be able to enter/exit in forward gear, manoeuvring to turn within the site boundary. It is also evidenced that car transporter bays are able to be accessed in entering in both forward gear and reverse.

6.9 Swept path analysis has been undertaken of the site access and proposed internal layout for both staff parking and car transporter parking bays. In addition an indicative location for a potential car transporter vehicle servicing and maintenance facility has been shown with the flexibility of operating in one direction, whether clockwise and anti-clockwise, dependent upon future design and operational requirements.

6.10 The proposed use of the site would require no formal staff parking, only the storage of cars associated with the business.

Appearance

6.11 The site comprises raised ground with an access road laid internally directing northwards before looping around to

provide sufficient space to accommodate the swept-paths associated with large transporter vehicles. Vehicle storage is proposed around the site perimeter. No new buildings are proposed as part of this full application.

Landscaping and Biodiversity

6.12 The importation of materials onto an area of hardstanding has not detrimentally affected the landscape. The vacant land was scrubland with no landscape qualities. The perimeter hedgerows and trees are to be untouched and will not be impacted by this development.

6.13 The application is accompanied by a Bat Scoping Report which confirms the building was assessed as having negligible potential for roosting bats and offered a limited number of opportunities for bats to access and use the building. Given the metal roof line and cladding along the entire walls of the building, bats would be unable to cling to the metal and utilise any potential roost features within the building. The occasional use of the building by individual common bat species on an opportunistic basis cannot be ruled out, however, no further survey work is recommended.

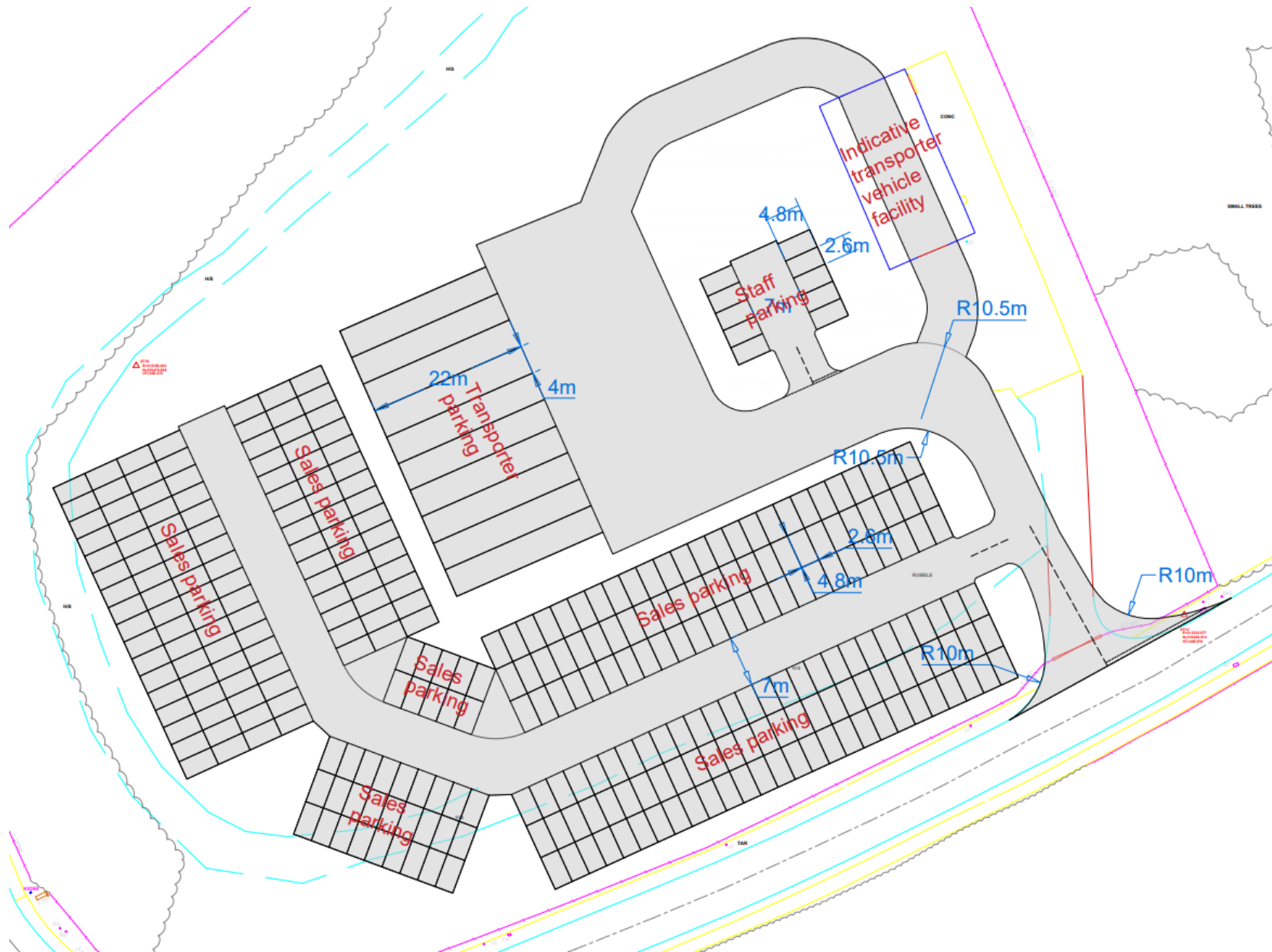
Community Safety

6.14 The site is within private ownership and is enclosed by a 2.1m security fencing. As such, the site does not pose a threat to community safety. In fact, the re-use of this site for storage purposes would provide a purpose to the site which would improve community safety and the overall appearance of the area. The demolition of the building will also discourage any possible anti-social behaviour.

Environmental Sustainability

6.15 The site has previously been raised using recycled materials and imported soil, therefore, this application for further importation is considered to make the best use of previously used materials which has an overall positive impact on the environmental sustainability of the site. The existing trees around the boundary will be unaffected.

PROPOSED LAYOUT PLAN



PLANNING APPRAISAL

Principle of Development

7.1 With regard to the principle of development, the site is located within the defined settlement boundary for Tredegar and is located within an existing employment allocation (Ref. EMP2.5) within the Blaenau Gwent Local Development Plan. PPW (12th Edition) supports developments on brownfield land within sustainable locations (i.e. within the settlement boundary) in close proximity to local services and facilities, and public transport nodes.

7.2 PPW also states that planning applications must be determined in line with the adopted local development plan, unless material considerations indicate otherwise. Moreover, considering that the site is on vacant land, and is situated in close proximity to well established highway networks, it is considered that the proposed development accords with the Welsh Government's objectives of the sustainable use of land and buildings.

7.3 The previous planning permission (Ref no. C/2023/0180) for the 'Retention of land reprofiling works through the importation of inert materials and the change of use from B2 (General Industrial) to Class B8 (Storage)' was obtained by Asbri Planning in December 2023. This established the principle of importing clean inert material onto site and also confirmed the use of the site for storage purposes. Therefore, the further importation of inert material, through this planning application, would allow the site levels to be brought up to an acceptable level which would facilitate transporter vehicles and long-axle vehicles to enter and exit the site. The levels will be brought up to the same level as the adjacent road which serves the industrial park.

7.4 The adopted LDP confirms under Paragraph 6.82 that *'Minimising or re-using waste generated through site development (including demolition waste) will reduce the amount of waste that has to be managed and ultimately disposed of. This in turn will contribute to a reduction in*

greenhouse gas emissions and the amount of primary construction materials extracted, processed and transported'

7.5 The principle of re-using inert material to raise the levels is considered to be an acceptable use of material as it will be used for a purpose rather than just being deposited elsewhere. The development is, therefore, considered to be in accordance with Policy SP7, SP13 and W1 of the adopted LDP as well as the planning guidance contained within PPW12.

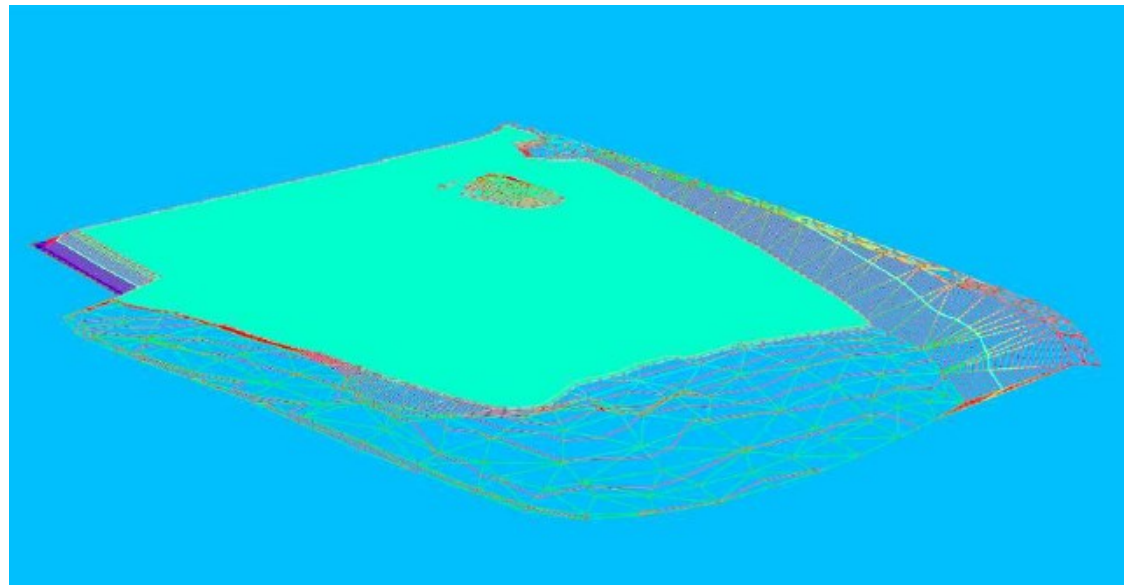
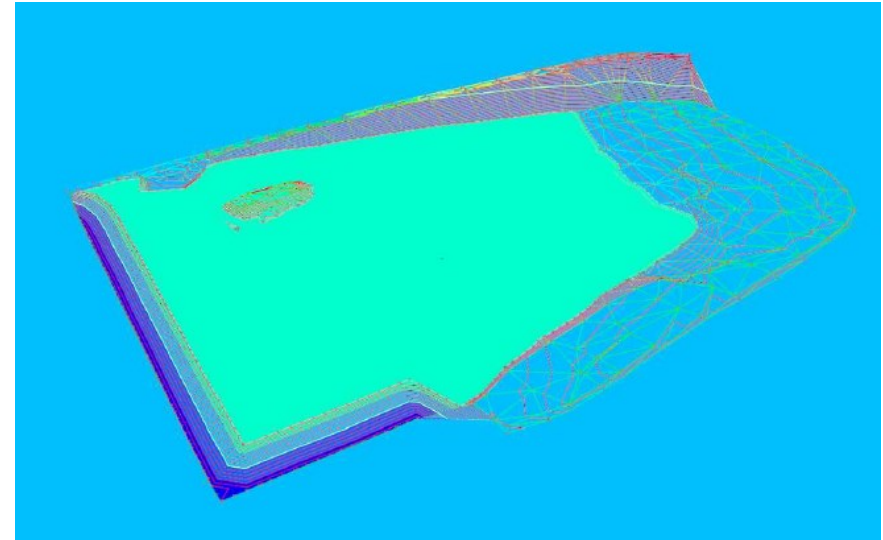
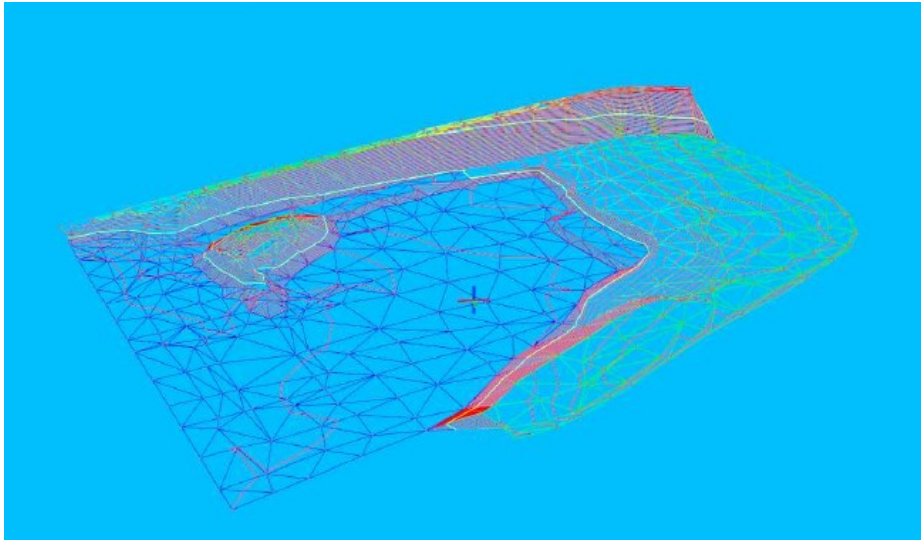
Other Considerations

7.6 It is acknowledged that the northern and western boundaries of the site consist of areas of trees and shrubbery. However, the work specific to this application is not considered to impact these areas of 'green' land, as it is only subject to the vacant land at the centre of the site. As such, it is considered that this proposal is in accordance with LDP Policy SP10 'Protection and Enhancement of the Natural Environment'.

7.7 The proposed land reprofiling works through the importation of inert material, and proposed demolition of the existing building to the east of the site would further contribute to the operations of Ron Skinner and Sons. As such, it would contribute to socio-economic growth within Tafarnaubach Industrial Estate, and further afield within the local area. It is therefore considered that this proposal is in accordance with LDP Policy SP1 'Northern Strategy Area', one of the primary policies of the local development plan.

7.8 In terms of impact on ecology, the application is accompanied by a Preliminary Ecological Survey and Reptile Mitigation Strategy which confirms the land impacted on by the deposited hardcore rubble mounds is directly south of the industrial building and comprises of an area of short perennial vegetation, concrete hardstanding and the edge of the area of standing water. The recommendations within the report will be adhered to in order to ensure the site has no detrimental impact on ecology or biodiversity opportunities.

3D LEVELS



GREEN INFRASTRUCTURE STATEMENT

7.1 Paragraph 6.21 of Planning Policy Wales defines green infrastructure as *“the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Component elements of green infrastructure can function at different scales and some components, such as trees and woodland, are often universally present and function at all levels. At the landscape scale green infrastructure can comprise entire ecosystems such as wetlands, waterways, peatlands and mountain ranges or be connected networks of mosaic habitats, including grasslands. At a local scale, it might comprise parks, fields, ponds, natural green spaces, public rights of way, allotments, cemeteries and gardens or may be designed or managed features such as sustainable drainage systems. At smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks.”*

7.2 The Environment (Wales) Act 2016 provides a context for the delivery of multi-functional green infrastructure. Its protection and provision can make a significant contribution to the sustainable management of natural resources, and in particular to protecting, maintaining and enhancing biodiversity and the resilience of ecosystems in terms of the diversity within and connections between ecosystems and the extent and condition of these ecosystems, so that they are better able to resist, recover from and adapt to pressures. This means that the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty under the Environment (Wales) Act 2016.

7.3 The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes.

7.4 The DECCA Framework and Net Benefits for Biodiversity: The DECCA framework is used for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act. These are: Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience.

7.5 A summary of the definitions is described below:

- Diversity: maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits.
- Extent: incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance.
- Condition: The condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer term types of disturbance. Both direct and wider impacts should be considered, for example avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect etc.
- Connectivity: This refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural resources. Developments should take opportunities to develop functional habitat and ecological networks within and between ecosystems, building on existing connectivity.
- Aspects of ecosystem resilience (adaptability, recovery and resistance): ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.

7.6 Paragraph 6.4.11 of Planning Policy Wales states that *“planning authorities must follow a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.”*

7.7 Paragraph 6.2.12 of Planning Policy Wales states that “a

green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied.

7.8 It is acknowledged that the application comprises the existing hard standing and a single industrial building which has been surveyed and is considered to be of low ecological value. As such, its removal will not have a detrimental impact on the biodiversity offerings on-site. The importation of further material will add to the existing material on-site and will raise the site levels within the centre of the site. Given the existing use and the need to provide a new area for the storage of cars, associated with the operations of Ron Skinner and Sons, it is not possible to avoid the development. However, by providing biodiversity net benefits through appropriate landscaping, it is considered to be an acceptable solution and the scheme will enhance the existing provision.

7.9 The accompanying Biodiversity Enhancement report confirms that the provision of at least 5 native trees within the development site boundary, 5 x tree mounted bat and bird boxes and wildlife friendly lighting to be used within the site will be sufficient from a biodiversity perspective. Post construction measures are also proposed including making sure that any fencing used within the site boundary will allow the passage of small animals such as reptiles through the development site. This will allow reptiles to naturally recolonise areas of suitable habitat within the site boundary once development works are complete. Fencing will either be raised 13cm from the ground or will have 13cm by 13cm gaps cut into it every 3m.

7.10 On this basis, it is considered that this application demonstrates compliance with PPW and follows the Step-Wise Approach

CONCLUSION

8.1 This Planning, Design and Access Statement has been prepared by Asbri Planning on behalf of Ron Skinner & Sons, in respect of the proposed planning application for the demolition of the existing building, importation of inert material together with associated works at Unit 6, Tafarnaubach Industrial Estate, Tredegar.

8.2 The site lies within the defined settlement boundary for Tredegar and is allocated as an employment protection area under Policy EMP2.5. As such, the use of the land for B1, B2 and B8 Use Classes is considered to be appropriate and compliant with policy. The development will contribute to the ongoing operations of a major employer in the area and will allow for the further importation of material to site with the intention of raising the ground to allow transporters to bring cars onto site for storage.

8.3 A previous planning permission (C/2023/0180) for the 'Retention of land reprofiling works through the importation of inert materials and the change of use from B2 (General Industrial) to Class B8 (Storage)' was approved by Blaenau Gwent CBC in December 2023. This application regularised the previously imported material and secured the use of the site as a car sales storage. However, given that further materials are required to be imported to raise the site to the appropriate level, a subsequent planning application is to be submitted to Blaenau Gwent County Borough Council. This also includes the demolition of the existing building on-site.

8.4 Based on the material considerations outlined within this statement and the accompanying drawings and documents, it is concluded that the proposal represents an acceptable and sustainable form of development which is appropriate for the location. The proposals therefore comply with the relevant national and development plan planning policies and supplementary planning guidance.

8.5 It is for these reasons that it is respectfully requested that Blaenau Gwent County Borough Council grant full planning permission for the development.