# PLANNING STATEMENT

# Former Aneurin Labour Club, Heol Aneurin, Caerphilly

June 2024



# **Summary**

#### **Proposal:**

Proposed residential development and associated works

#### Location:

Former Aneurin Labour Club, Heol Aneurin, Caerphilly

#### Date:

June 2024

## **Project Reference:**

24.147

## **Client:**

Castell Group

## **Product of:**

Asbri Planning Limited Unit 9 Oak Tree Court Mulberry Drive Cardiff Gate Business Park Cardiff CF23 8RS

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# Introduction

- 1.1 This Planning Statement accompanies a statutory pre-application consultation (PAC) on behalf of Castell Group in respect of the proposed residential development and associated works at the former Aneurin Labour Club, Heol Aneurin, Caerphilly.
- 1.2 The planning application comprises the following set of drawings:

Drawing name	Drawing reference	Prepared by
Architectural		,
Site Location Plan	XX-DR-A-1100-P1	HLN Architecture
Existing Site Plan	XX-DR-A-1101	HLN Architecture
Topographical Survey	XX-DR-A-1102	HLN Architecture
Existing Site Sections	XX-DR-A-1103-P1	HLN Architecture
SWOT Analysis	XX-DR-A-1104	HLN Architecture
Site Photography	XX-DR-A-1105	HLN Architecture
Context Analysis	XX-DR-A-1106-P1	HLN Architecture
Proposed Block Plan	00-DR-A-1110	HLN Architecture
Proposed Site Plan	00-DR-A-1111-P5	HLN Architecture
Proposed Ground Floor Plan	00-DR-A-1112-P3	HLN Architecture
Proposed First Floor Plan	00-DR-A-1113-P2	HLN Architecture
Proposed Second Floor Plan	00-DR-A-1114-P2	HLN Architecture
Proposed Roof Plan	00-DR-A-1115-P2	HLN Architecture
Proposed Apartment Type 1	ZZ-DR-A-1120-P1	HLN Architecture
Proposed Apartment Type 2	ZZ-DR-A-1121-P1	HLN Architecture
Proposed Apartment Type 3	ZZ-DR-A-1122-P2	HLN Architecture
Proposed Site Sections	XX-DR-A-1130-P2	HLN Architecture
Proposed Section 1	XX-DR-A-1131-P2	HLN Architecture
Proposed North Elevation	XX-DR-A-1132-P1	HLN Architecture
Proposed South Elevation	XX-DR-A-1133-P1	HLN Architecture
Proposed East Elevation	XX-DR-A-1134-P1	HLN Architecture
Proposed West Elevation	XX-DR-A-1135-P1	HLN Architecture
Proposed Street Elevations	XX-DR-A-1136-P1	HLN Architecture

Proposed Refuse and Recycling Store	ZZ-DR-A-1140	HLN Architecture
Proposed Bicycle Store	ZZ-DR-A-1141	HLN Architecture
Proposed Hard Landscaping Plan	XX-DR-A-1150	HLN Architecture
Proposed Visibility Splay	XX-DR-A-1151	HLN Architecture
Proposed Boundary Treatment Plan	XX-DR-A-1152	HLN Architecture
Proposed 3D Views	XX-DR-A-1160-P1	HLN Architecture
Engineering		
Engineering	10404-100 Rev.A	Phoenix Design
Landscaping		
Soft Landscape Proposals	1219.01 Rev.A	dp landscape architecture
Arboriculture		
Arboricultural Impact Assessment	-	Treescene Arboricultural Consultants
Tree Protection Plan	-	Treescene Arboricultural Consultants

1.3 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application forms (1APP)	Asbri Planning
Design and Access Statement	HLN Architecture
Planning Statement	Asbri Planning
Arboricultural Impact Assessment and Arboricultural Method Statement	Treescene Arboricultural Consultants
Ecological Impact Assessment	GE Consulting
Green Infrastructure Statement	dp landscape architecture
Transport Statement	Apex Transport Planning
Market Demand Assessment	BP2 Land & Property Consultants

1.4 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues

and planning merits of the proposed development. The statement is structured as follows:

- Section 2: provides a description of the site and its surroundings;
- **Section 3:** provides a review of the site's planning history;
- **Section 4**: summarises the development proposals.
- **Section 5**: provides an overview of pre-application dialogue undertaken in regard to the emerging scheme.
- **Section 6**: outlines the relevant planning policy context, at both the national and local level.
- **Section 7**: addresses the key planning considerations associated with the development proposal.
- **Section 8**: provides a conclusion regarding the overall acceptability of the application.

# Site description

#### The Site & Surroundings

- 2.1 The site predominantly comprises hardstanding, bare ground and modified grassland. A discrete area of bramble scrub is present in the north of the site and several trees are situated along the western boundaries.
- 2.2 The site is located to the northwest of Caerphilly, along Heol Aneurin and is within close proximity to a range of facilities including Penyrheol Community Centre, Cwm Ifor Primary School, Aneurin Park and several local shops such as Tesco Express and Londis. The site is also located within a largely residential area.
- 2.2 In terms of immediate surroundings, the site is bordered by Caledfryn Way to the north, to the east by Heol Aneurin, to the south by Penyrheol Community centre and to the west by scrubland. The site is situated on the following grid coordinates E:313936, N:188226.
- 2.3 A review of Natural Resources Wales's Development Advice Map (DAM) reveals that the site lies within Flood Zone A. As such, it is considered to be at little or no risk of fluvial or tidal/coastal flooding. In respect of NRW's Flood Map for Planning, which will supersede the DAM later in 2024, indicates that the northern and eastern peripheries of the site are susceptible to surface water flooding along the roadways.
- 2.4 A review of Cadw's designated historical assets indicates that the site is not occupied by any listed buildings or scheduled monuments. The nearest historical asset to the site relates to Hendredenny Hall (Ref: 13557), a Grade II Listed building located some 580m to the southwest of the site.

#### Access

- 2.5 Vehicular and pedestrian access to the site can be obtained to the east of the site along Heol Aneurin. The historic pedestrian access to the site was also obtained along Heol Aneurin via a footpath to the labour club, however following the demolition of the labour club in light of an arson attack, no designated pedestrian access currently exists at the site.
- 2.7 A review of Ordnance Survey mapping reveals that there are no Public Rights of Way (PROW) within the site boundary or its vicinity. The proposed development will therefore not require the extinguishment or diversion of any existing PROWs. A traffic-free

- cycle route is located approximately 250m to the south of the site and provides access to Abertidwr and Senghenydd to the northwest.
- 2.8 The site lies in an inherently sustainable location. The nearest bus stops are located approximately 100m to the south of the site along Heol Aneurin and the B4263. The B, C, E, K and X bus services operate from these stops, and provide a combined frequency of 7no. services per hour. The bus services provide access to Caledfryn, Senghenydd, Penyrheol as well as Caerphilly Town Centre and Rail/Bus Interchange. From the Rail and Bus Interchange, it is possible to access numerous further services which connect to additional locations, including key regional locations such as Cardiff.

# Planning history

3.1 A review of Caerphilly County Borough Council's online planning history search highlights the following history for the site:

Application Ref	Proposals	Date determined	Decision
23/0532/NOTD	Demolish 2 storey building	14/09/2023	Prior Approval Required
P/04/1082	Change of use of concert hall to snooker hall	16/09/2004	Approved subject to Conditions
5/5/91/0254	Change of use of concert hall to snooker hall and erect concert hall and amenities	07/1101991	Approved subject to Conditions
5/5/82/0683	Storm Porch	19/01/1983	Approved subject to Conditions
5/5/81/0429	Open air market (one day per week – Tuesday)	13/05/1981	Refused
5/5/79/1273	Single storey extension for extra storage	30/10/1979	Approved subject to Conditions

# **Proposals**

4.1 The proposed development comprises a residential development and associated works at the site of the former Aneurin Labour Club in Caerphilly.

### **Amount, Scale and Appearance**

- 4.2 As aforementioned, the site currently comprises hardstanding, bare ground and modified grassland. The proposals seek to develop the site with the following:
  - 30no. new apartments (21no. 1-bed 2-person and 9no. 2-bed 3-person);
  - 30no. new onsite car parking spaces;
  - Retention of soft landscaping where possible and the introduction of a new Green Infrastructure strategy throughout the site;
  - Refuse / Recycling / Bin storage; and
  - New access road with turning head.
- 4.3 The new apartment building is to be located within the eastern section of the site to ensure that the development addresses the primary street elevation along Heol Aneurin, and also the corner of Caledfryn Way.
- 4.4 The apartment building has been designed in a T-shape to allow for the retention of the existing vehicle access point and for the incorporation of soft landscaping around the curtilage of the building.
- 4.5 In terms of massing, the apartment building will be three storeys in height, and the inclusion of a flat roof will provide photovoltaic (PV) opportunities at the site.

## **Materials**

- 4.6 The following materials are proposed at for the development of the site:
  - Walls –Weberwall Brick Slip Colour palette: Buff brickwork
     / Antique red multi / Sanded red;
  - Cladding Hardie Plank Colour palette: Boothbay Blue / Heathered Moss / Evening Blue / Iron Grey / Timber Bark
  - Windows uPVC Dark grey
  - Roof Tiles

# **Access and parking**

- 4.7 Vehicular access to the site is to be obtained along the eastern boundary along Heol Aneurin (as per existing). This will lead to the car parking area at the rear of the site, which will provide 30no. parking spaces for residents.
- 4.8 Pedestrian access to the site can also be achieved along Heol Aneurin via a dedicated footpath.
- 4.9 The site is served by bus stop provision along Heol Aneurin and the B4263 to the south. The bus stops provide access to services B, C, E, K and X, which provide a combined frequency of 7no. services per hour. These link to locations such as Caledfryn, Senghenydd, Penyrheol, as well as directly to Caerphilly Town Centre and Rail/Bus Interchange. Further transport services can be accessed at this location.

# **Pre-Application Discussions**

- 5.1 This planning application is subject to a pre-application discussions (Ref: SPA/24/0036) with Caerphilly County Borough Council. These discussions were used as opportunities to gain feedback on design aspects, including the intended typology, design, layout, massing and scale, and other considerations.
- 5.2 Initial comments were received from Arboricultural, Landscape, Waste and Strategic Planning Officers prior to an on-site meeting taking place between the design team and case officer, Helen Winsall, on the 7th June 2024, which are summarised below:

#### **Arboricultural Comments**

- Compensatory planting is required.
- Where trees are being retained, adequate tree protection is required.

#### **Landscape Comments**

- Any trees and vegetation removed will require compensation replanting, especially along the northern boundary and wider site at a ratio of 3 to 1.
- Tree planting should be expanded in relation to the proposed parking area, to provide valuable shade during prolonged periods of hot weather.
- Tree species will ned to be expanded well beyond native species alone, due to the increasing impact on climate change on native trees in the UK.
- Species rich grassland with wildflower mixes need to be considered.

#### **Waste Comments**

• Developer should ensure that there is adequate space allocated for 2 x 240 litre bins plus a food caddy per unit and suitable access for servicing.

## **Strategic Planning Comments**

- Evidence is required to show that the application site is surplus to requirements for community facilities in accordance with Policy CW8 of the LDP.
- 5.3 Following the site meeting with the case officer, the following comments were raised:
  - Reduce number of parking spaces to provide tree planting between parking bays and links to open green space.

- Potential for a pedestrian link to the green space to the rear of the car parking area.
- Queries surrounding whether there's a market for community use for the site.
- 5.4 In light of the comments raised, the following amendments have been made to the proposals:
  - It has been possible to retain 30no. spaces whilst also providing landscaping within the central car park area through the redistribution of spaces throughout the site.
  - It was confirmed during the meeting that as the site has not been marketed, further justification should be provided to demonstrate that community use of the site is surplus to requirement.

# Planning policy context

#### Introduction

- 6.1 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 (February, 2021);
  - Caerphilly County Borough Council Local Development Plan (adopted November 2010)
- 6.2 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;
  - Caerphilly County Borough Council Supplementary Planning Guidance.

#### **National Level**

# The Well-Being of Future Generations (Wales) Act 2015

- 6.3 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires "public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle". The Act sets out seven 'well-being' goals as follows:
  - A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and welleducated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
  - A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).

- A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and wellconnected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything
  to improve the economic, social, environmental and cultural wellbeing of Wales, takes account of whether doing such a thing may
  make a positive contribution to global well-being.
- 6.4 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.

# National Development Framework: Future Wales – The National Plan 2040

- 6.5 The National Development Framework: Future Wales the National Plan 2040 was published on 24<sup>th</sup> February 2021. 'Future Wales' sets out the Welsh Government's 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. As stated above, the National Development Framework has Development Plan status.
- 6.6 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Pages 54-56 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time, as follows:

A Wales where people live:

- 1. ...and work in connected, inclusive and healthy places
- 2. ...in vibrant rural places with access to homes, jobs and services
- 3. ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth
- 4. ...in places with a thriving Welsh Language
- 5. ...and work in towns and cities which are a focus and springboard for sustainable growth
- 6. ...in places where prosperity, innovation and culture are promoted
- 7. ...in places where travel is sustainable
- 8. ...in places with world-class digital infrastructure
- 9....in places that sustainably manage their natural resources and reduce pollution
- 10. ...in places with biodiverse, resilient and connected ecosystems
- 11. ...in places which are decarbonised and climate-resilient

## **Growth Strategy**

6.7 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

Policy 1 - Where Wales will Grow

The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- Cardiff, Newport and the Valleys
- Swansea Bay and Llanelli
- Wrexham and Deeside
- 6.8 Cardiff, Newport and the Valleys, the region within which the site is located, will be the focus for growth and investment in the South East Region. Policy 33, which relates to these regions, states that:

"The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys' strategic role and ensure key investment decisions support places in the National Growth Area and the wider region...

The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys."

- 6.9 The National Plan further explains that "Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources" (page 60).
- 6.10 The benefits of the proposed growth strategy and specifically the colocation of homes, jobs and services is highlighted as follows: "Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and wellbeing" (page 60).

#### **Placemaking**

- 6.11 Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that "Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration".
- 6.12 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

"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. Urban growth and regeneration should be based on the following strategic placemaking principles:

- creating a rich mix of uses;
- providing a variety of housing types and tenures;
- building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;
- increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;
- promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and
- integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment."
- 6.13 Further detail on the Welsh Government's strategic placemaking priorities is set out at Page 66 of Future Wales. Key placemaking principles are summarised below:

#### Mix of uses

To create activity throughout the day and enable people to walk and cycle, rather than being reliant on travelling by car, places should have a rich mix of residential, commercial and community uses within close proximity to each other. Urban growth and regeneration should integrate different uses within neighbourhoods.

#### Variety of housing

To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.

#### Walkable scale

To enable active and healthy lives, people should be able to easily walk to local facilities and public transport. Urban growth and regeneration should be focused within inner city areas and around town centres, as well as around mixed use local centres and public transport. Co-working hubs offering an alternative to home-working are an important feature of the economy, and these should be located in town and local centres.

#### **Density**

To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. It may be necessary to take social distancing requirements into consideration when designing public and communal spaces.

#### Street network

To provide a framework for different uses and types of housing to be integrated within neighbourhoods, urban growth and regeneration should be based on a network of streets that enable social distancing if necessary. The street network should be permeable, with streets primarily connecting at both ends with other streets and providing links into, out of, and through places. The street network should have a hierarchy, with streets that have different characters and functions.

# Plot-based development

To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and local builders, urban growth and regeneration should provide opportunities for the development of small plots. A plot-

based approach to development should be promoted, including the subdivision of larger sites to be built in small plots or as a group of plots.

#### Green infrastructure

To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration. Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated.

## **Biodiversity and Green Infrastructure**

- 6.14 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires "an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable" (page 76).
- 6.15 In addition to this, the associated importance of green infrastructure is highlighted:

"As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being" (page 78).

6.16 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

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.

## **Transport**

- 6.17 Future Wales identifies that transport in Wales is currently dominated by the car and that "our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people's everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people's health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation" (page 85).
- 6.18 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required "to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel" (page 85).
- 6.19 Policy 12 of Future Wales discusses Regional Connectivity, and states that "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."

## **Planning Policy Wales Edition 12**

- 6.20 Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Wellbeing of Future Generations (Wales) Act 2015.
- 6.21 Sustainable Development is defined at Page 7 of PPW 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".
- 6.22 Paragraph 1.18 sets out that "Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated".

#### <u>Placemaking</u>

- 6.23 In accordance with the National Development Framework, placemaking is also at the heart of PPW Paragraph 2.1 for example states that "Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities".
- 6.24 It is summarised succinctly at Paragraph 2.3 that "The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and wellbeing, creating prosperity for all".
- 6.25 Placemaking is defined at Page 14 of PPW as follows:

"Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well being in the widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings".

- 6.26 A set of 'national sustainable placemaking outcomes' are outlined on page 17 PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:
  - Creating and Sustaining Communities
    - Enables the Welsh language to thrive
    - Appropriate development densities
    - Homes and jobs to meet society's needs
    - A mix of uses
    - Offers cultural experiences
    - Community based facilities and services
  - Making Best Use of Resources
    - Makes best use of natural resources
    - Prevents waste
    - Prioritises the use of previously developed land and existing buildings
    - Unlocks potential and regenerates
    - o High quality and built to last

- Maximising Environmental Protection and Limiting Environmental Impact
  - Resilient biodiversity and ecosystems
  - Distinctive and special landscapes
  - o Integrated green infrastructure
  - Appropriate soundscapes
  - Reduces environmental risks
  - Manages water resources naturally
  - o Clean air
  - o Reduces overall pollution
  - Resilient to climate change
  - Distinctive and special historic environments
- Growing Our Economy in a Sustainable Manner
  - Fosters economic activity
  - o Enables easy communication
  - o Generates its own renewable energy
  - Vibrant and dynamic
  - Adaptive to change
  - Embraces smart and innovative technology
- Facilitating Accessible and Healthy Environments
  - Accessible and high quality green space
  - o Accessible by means of active travel and public transport
  - Not car dependent
  - Minimises the need to travel
  - Provides equality of access
  - Feels safe and inclusive
  - Supports a diverse population
  - Good connections
  - Convenient access to goods and services
- 6.27 It is highlighted at Paragraph 2.20 that "Not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being".
- 6.28 The implications of COVID are highlighted in Paragraph 2.22, stating for example that "We must ensure that a post-Covid world has people's well-being at its heart. Planning Policy Wales leads the way in this respect and contains the principles and policies needed for us to recover from this situation in a positive manner".

## Good Design

6.29 The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW where it is stated that "Good design is fundamental to creating sustainable places where people

want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area".

- 6.30 Good design must enable development proposals to address the issues of inclusivity and accessibility for all, and it is highlighted at Paragraph 3.6 that "This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport".
- 6.31 In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals Paragraph 3.7 states for example 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".
- 6.32 The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8:
  - "Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places".
- 6.33 Paragraph 3.12 outlines that good design is also about avoiding the creation of car-based developments by minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. It is stated that "Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate".

#### Welsh Language

6.34 It is set out in PPW that the Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. Paragraph 3.29 states that "If required, language impact assessments may be carried out in respect of large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language".

#### Sustainable Transport

- 6.35 PPW advises at Paragraph 4.1.10 that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:
  - "are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
  - are designed in a way which integrates them with existing land uses and neighbourhoods; and
  - make it possible for all short journeys within and beyond the development to be easily made by walking and cycling".
- 6.36 Paragraph 4.1.11 summarises that: "Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services".
- 6.37 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. Paragraph 4.1.13 sets out that "The sustainable transport hierarchy should be used to reduce the need to travel, prevent cardependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport".

#### **Active Travel**

6.38 The importance of developing local active travel networks to help mitigate the impact of new development by providing an alternative mode of travel to the private car is highlighted in PPW. It is stated at Paragraph 4.1.30 that "Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing

settlements and networks, in a way which makes active travel a practical, safe and attractive choice".

#### **Public Transport**

6.39 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this "by locating development where there is, or can be, good access by public transport".

#### **Community Facilities**

- 6.40 Section 4.4 of PPW discusses the importance of community facilities and how 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."
- 6.41 Paragraph 4.4.5 also states that "Planning authorities should consider the needs of their communities and the visitors to their places. It is important that people are not excluded from places because the community facilities they need are not available."

#### **Green Infrastructure**

6.42 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.5 that "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, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places".

#### Sustainable Drainage Systems (SuDS)

6.43 The importance of considering SuDs as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that "The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development". It is advised at Paragraph 6.6.19 that "Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified".

#### **Technical Advice Notes**

- 6.44 The following Technical Advice Notes (TANS) are of relevance to the proposed development:
- 6.45 TAN 2 Planning and Affordable Housing (2006): outlines the general concept of affordable housing as being: "the ability of households or potential households to purchase or rent property that satisfies the needs of the household without subsidy". The guidance requires local planning

authorities to: "include an affordable housing target in the development plan which is based on the housing need identified in the local housing market assessment, indicate how the target will be achieved using identified policy approaches and monitor the provision of affordable housing against the target and where necessary take action to ensure that the target is met".

- 6.46 TAN 5 Nature Conservation and Planning (2009): provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.
- 6.47 TAN 12 Design (2016): provides advice on design considerations and states that development should aim to:
  - Create places with the needs of people in mind, which are distinctive and respect local character
  - Promote layouts and design features which encourage community safety and accessibility
  - Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles
  - Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building
  - Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards
  - Secures the most efficient use of land including appropriate densities
  - Consider and balance potential conflicts between these criteria
- 6.48 TAN 18 Transport (2007) confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.

#### **Local Level**

6.49 The Caerphilly County Borough Local Development Plan (LDP) was adopted in November 2010 and comprises part of the prevailing development plan for the area.

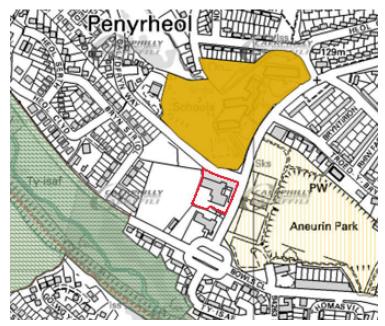


Figure 1: Site location in relation to Caerphilly's LDP Proposals Map

6.50 The following Caerphilly LDP policies are considered relevant in the context of the proposed development:

Policy Reference	In relation to
Strategy Policies	
SP3	Development in the Southern
	Connections Corridor
SP4	Settlement Strategy
SP5	Settlement Boundaries
SP6	Place Making
SP7	Planning Obligations
SP8	Minerals Safeguarding
SP10	Conservation of Natural Heritage
SP14	Total Housing Requirements
SP15	Affordable Housing Target
SP21	Parking Standards

Countywide Policies	
CW1	Sustainable Transport, Accessibility and Social Inclusion
CW2	Amenity
CW3	Design Considerations: Highways
CW4	Natural Heritage Protection
CW5	Protection of the Water Environment
CW6	Trees. Woodlands and Hedgerow Protection
CW8	Protection of Community and Leisure Facilities
CW11	Affordable Housing Planning Obligation
Strategy Area 3: So	outhern Connections Corridor
SI1	Green Wedges
NH1	Special Landscape Areas
NH3	Sites of Importance for Nature Conservation
MN2	Minerals Safeguarding

6.51 Of particular relevance to the proposals is Policy SP5, which relates to Settlement Boundaries, and notes that:

"The Plan defines settlement boundaries in order to:

- A. Define the area within which development would normally be allowed, taking into account material planning considerations
- B. Promote the full and effective use of urban land and thus concentrate development within settlements
- C. Prevent the coalescence of settlements, ribbon development and fragmented development
- D. Prevent inappropriate development in the countryside."
- 6.52 In addition, Policy SP15 (Affordable Housing Target) states:

  "The Council will seek to deliver through the planning system at least
  964 affordable dwellings between 2006 and 2021 in order to contribute
  to balanced and sustainable communities."

- 6.53 Another policy to note is Policy CW8, which relates to the Protection of Community and Leisure Facilities. The Policy notes that:

  "Proposals that would result in the loss of a community and/or leisure facility will not be permitted except where:
  - A) A Comparable replacement facility can be provided by the developer either on or off site, and within easy and convenient access on foot or by bicycle, or
  - B) It can be demonstrated that the facility is surplus to requirements."

# **Supplementary Planning Guidance**

- 6.54 The following Supplementary Planning Guidance (SPG) adopted by Caerphilly County Borough Council is of relevance to the proposed development:
  - LDP1 Affordable Housing Obligations
  - LDP4 Trees and development
  - LDP5 Car Parking Standards
  - LDP6 Building Better Places to Live

# **Appraisal**

#### **Overview**

- 7.1 As stated above, 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. This section of the Planning
  Statement aims to identify the main issues of relevance to the
  determination of the Planning Application, and assess the scheme
  against the Development Plan.
- 7.2 The key material considerations of relevance in the determination of the application are as follows:
  - The principle of development at this location;
  - The impact of the development on the character and appearance of the surrounding area;
  - The impact of the development in terms of highways, access and parking;
  - The impact in relation to **biodiversity**; and
  - Any other material considerations.

#### The Principle of Development

- 7.3 The site is situated within white land within the settlement boundary, as such, is located in an area where development is normally permitted in accordance with Policy SP5 (Settlement Boundaries) of the adopted LDP. Furthermore, the site was formerly occupied by the Aneurin Labour Club. It therefore constitutes previously developed land and its reuse will promote sustainability principles in accordance with paragraph 3.55 of PPW.
- 7.4 Strategic Policies SP14 (Total Housing Requirements) and SP15 (Affordable Housing Target) of the LDP identify that the council has made provision for the development of up to 10,269 new dwellings across the plan period, of which at least 964 will be affordable. The development will therefore make a significant contribution to achieving these targets through the provision of 30no. affordable apartments.
- 7.5 Policy CW11 (Affordable Housing Planning Obligation) identifies that for sites within the Caerphilly Basin, a provision of 40% affordable housing will be sought. The scheme is being progressed by Castell Group in partnership with a local Registered Social Landlord and will therefore be 100% affordable. The development will therefore significantly exceed the required affordable housing provision, which is a material consideration of significant weight in the consideration

- of the pre-application enquiry in accordance with paragraph 4.2.26 of PPW.
- 7.6 The surrounding land immediately adjacent to the site is varied but it sits within the wider residential area of Penyrheol. As such, residential use of the site represents a conforming land use.
- 7.7 PPW states that local planning authorities must identify a sufficient supply of land for housing to meet the differing needs of communities across all tenures. The latest Annual Monitoring Report (2022) identifies that one policy SP15 (Affordable Housing Target) and one objective (9: Ensure an adequate and appropriate range of housing sets are available in the most suitable locations) are not being delivered. Paragraph 10.7 of the report identifies that it has not been possible for the adopted LDP to achieve its target of 8,625 dwellings, and at least 964 affordable dwellings, over the plan period. Paragraph 10.8 goes on to state that the under-delivery of housing will remain a material consideration in the determination of planning applications, and inspectors will continue to regard it as a significant material consideration, despite the revocation of Technical Advice Note 1 (Joint Housing Land Availability Studies).
- 7.8 Whilst the Delivery Agreement for the 2nd Replacement Caerphilly County Borough Local Development Plan, up to 2035, was agreed by Welsh Government on the 17th June 2021 and the candidate site process was undertaken from 2021 to 2022, it is understood that the process is currently on hold whilst Welsh Government's objections to the Plan are addressed. As such, it will likely not be adopted for some time. Therefore, there is no current strategic programme, or short-term solution, to address the Council's persistent and ongoing housing supply shortfall over and above planning applications such as this.
- 7.9 Another LDP policy to address is Policy CW 8 which seeks to protect against the loss of community and/or leisure facilities. It should be emphasised that the Labour Club is no longer standing having recently been demolished following an arson attack, therefore it is our view that as the proposals do not result in the loss of a community facility (as it has already been lost) then Policy CW8 does not apply. Notwithstanding, the Strategic Planning Officer requested further information to demonstrate that the site is not viable to retain a community use through a marketing use. It was agreed during preapplication discussions that a letter will be provided by an estate agent to demonstrate that the likelihood of the site being reoccupied for a community use is limited in the extreme.
- 7.10 Policy CW8 indicates that proposals resulting in the loss of a community and/or leisure facility will not be permitted unless they

comply with one of two identified criteria. Criterion B is therefore discussed in further detail below.

Criterion B: It can be demonstrated that the facility is surplus to requirements.

- 7.11 First, it should be emphasised that the site lies immediately to the north of Penyrheol Community Centre, which provides a space for activities such as community fundraisers, parties and activity clubs to take place. A licenced bar is also located on site.
- 7.12 The Angel Bar and Grill is also located some 450m to the south of the site along White Cross Lane. Here, visitors can enjoy a wide range of food offerings and a choice of alcoholic and non-alcoholic drinks at the bar. The bar and grill also holds events such as Breakfast with Santa, and live music.
- 7.13 The community centre and Angel Bar and Grill is therefore commensurate with what was offered by the former Aneurin Labour Club, if not greater than the former labour club in terms of community activities and events. It is therefore considered that the local community will continue to be adequately served by facilities to which there is easy and convenient access by means other than private car.
- 7.14 It should also be noted that further community facilities are located within walking distance to the site. For instance, Aneurin Park is located approximately 50m to the east of the site and provides facilities such as a bowling green, playing fields, a skate park, play area and tennis courts. Furthermore, both St Andrew's Church and Bethel Baptist Church are located some 300m to the northeast and southeast of the site respectively. Cwm Ifor Primary School is also located 240m to the north of the site.
- 7.15 It is considered that the expectation of the site becoming reoccupied as a labour club is limited in the extreme as data gathered from UK Government figures by real estate specialists Altus Group shows that approximately 80no. pubs closed per month in the period to 31st March 2024<sup>1</sup>. Within the same period, 239 pubs in England and Wales were either knocked down or converted for other uses.<sup>2</sup> This

<sup>&</sup>lt;sup>1</sup> <u>https://www.thedrinksbusiness.com/2024/06/pub-closures-spike-inengland-and-wales/</u>

<sup>&</sup>lt;sup>2</sup> https://www.express.co.uk/life-style/life/1912097/pub-closures-latest-UK

- decline has been exasperated by a combination of the Covid-19 pandemic,<sup>3</sup> the cost-of-living crises and increasing energy prices<sup>4</sup>.
- 7.16 As such, it is unlikely in the extreme that the land of the former Aneurin Labour Club will be redeveloped for the use as a pub and become financially viable and there exists extensive and commensurate facilities within the surrounding area. Consequently it is considered that Penyrheol has a surplus of community facility provision, which demonstrates the proposals' compliance with criterion B of LDP Policy CW8.
- 7.17 In light of the above, the proposed development will make use of previously developed land within the settlement boundary in accordance with PPW, will make a contribution to addressing the Authority's housing shortfall and will provide a significant number of affordable dwellings. Furthermore, the site is highly unlikely to be reoccupied for a brand new comparative use to the former Labour Club or other community use. The principle of development is therefore considered to be firmly established.

## **Character and Appearance of the surrounding area**

7.18 The key policy consideration whilst assessing the impact of the proposed development upon the character and appearance of the surrounding area is identified in the content of PPW Edition 12, together with the Placemaking principles contained within Policy SP6 (Placemaking) of the adopted LDP. Policy SP6 identifies a number of placemaking principles that proposals should have regard to and are discussed in further detail below:

<u>Criterion A: An appropriate mix of uses that reflect the role and function</u> of settlements

7.19 Given the scale and location of the site, it is considered that residential use is reflective of the function of the surrounding settlement in accordance with criterion A of Policy SP6.

<u>Criterion B: A high standard of design that reinforces attractive qualities</u> of local distinctiveness

7.20 The accompanying elevation plans prepared in support of this Preapplication Consultation provides details on the scale of the building

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FORMER ANEURIN LABOUR CLUB, CAERPHILLY | PLANNING STATEMENT PAGE | 33

<sup>&</sup>lt;sup>3</sup> https://www.theguardian.com/business/2023/sep/18/pub-closures-rise-sharply-amid-warning-over-planned-business-rate-change

<sup>&</sup>lt;sup>4</sup> https://www.morningadvertiser.co.uk/Article/2024/06/17/pub-closuresup-51-for-first-3-months-of-2024?int campaign=Most-popular-

which is commensurate with the site and its surroundings. An indicative materials palette has also been prepared, which demonstrates that the design of the development will be of high quality and reflect local characteristics in accordance with criterion B.

<u>Criterion C: Design in accordance with best practice in terms of designing out crime</u>

7.21 The development will ensure security through the 'designing-outcrime' principles of Secured by Design and is therefore in accordance with criterion C of Policy SP6.

<u>Criterion D: A location and layout that reflects sustainable transport and accessibility principles and provides full, easy and safe access for all</u>

7.22 The site is accessible to public transport in the form of bus provision and Active Travel infrastructure. As aforementioned, a traffic-free cycle route is located approximately 250m to the south of the site and provides access to Abertidwr and Senghenydd to the northwest. In terms of public transport provision, the nearest bus stops are located approximately 100m to the south of the site along Heol Aneurin and the B4263. The B, C, E, K and X bus services operate from these stops, and provide access to Caledfryn, Senghenydd, Penyrheol as well as Caerphilly Town Centre and Rail/Bus Interchange. From the Rail and Bus Interchange, it is possible to access numerous further services which connect to additional locations, including key regional locations such as Cardiff

7.23 In addition, the development will comply with Welsh Development Quality Requirements ensuring that it is accessible to all through the provision of ground floor flats in accordance with criterion D.

<u>Criterion E: The incorporation of resource efficiency and passive solar</u> gain through layout, materials, construction techniques, water conservation, and where appropriate the use of sustainable drainage <u>systems</u>

7.24 The layout has been prepared to incorporate sustainable drainage systems and the scheme will comprise aspects to address the impacts of climate change. For example, PVs are proposed to be installed on the roof of the proposed building. The proposal is therefore in accordance with criterion E which relates to resource efficiency.

<u>Criterion F: The efficient use of land, including higher densities where</u> <u>development is close to key transport nodes</u>

7.25 The accompanying site layout illustrates that the development will make an efficient use of the land available and through the provision of a flatted development will result in a higher density of homes than

a scheme comprised of dwellinghouses. As identified above, the site is within close proximity to bus stop provision at Heol Aneurin and the B4263 and provide a combined frequency of 7no. services per hour. Whilst achieving a high density of affordable homes, the development will also provide sufficient areas of Green Infrastructure, Sustainable Drainage and parking in accordance with criterion F.

# <u>Criterion G: The incorporation and enhancement of existing natural heritage features</u>

7.26 The site layout demonstrates how the quantum of development proposed can be accommodated whilst ensuring that as many existing trees on site as possible can be retained. Notwithstanding, the accompanying Green Infrastructure Strategy identifies that removal of existing features will be limited to Category U trees and a small area of scrub. The hedgerow on site is proposed to be retained, subject to detailed design of retaining structures on site. In accordance with the recent updates to Chapter 6 of PPW, compensatory landscape planting will be provided throughout the site in accordance with criterion G.

# <u>Criterion H: The incorporation of mitigation measures that improve and</u> maintain air quality

- 7.27 Given the use of the site for residential development, it is not envisaged that air quality will be impacted upon. The proposal is therefore considered to be in accordance with the final criterion of Policy SP6.
- 7.28 Taking all of the above into consideration, it is evident that the proposed development will have a positive impact upon the character and appearance of the surrounding area and will comply with the provisions of Policy SP6 (Placemaking) and PPW.

#### Highways, access and parking

- 7.29 The scheme proposes to redevelop the site to accommodate 30no. affordable units in a mix of 1 and 2 bed dwellings. It is considered that the impact of the development on the local highway network will be minimal.
- 7.30 In regard to parking, the accompanying layout illustrates that 30 no. spaces can be provided which equates to 1 space per dwelling. Caerphilly Council's parking standards identifies that 1 space per bedroom could be provided for a development of this nature. However, it is considered that the site lies in an inherently sustainable location with immediate access to public transport provision and local services and amenities. Furthermore, it should be emphasised that since the adoption of the LDP and Parking Standards, Future Wales: the National Plan 2040 has been published and comprises an

adopted Development Plan. Policy 12 (Regional Connectivity) establishes an onus on Planning Authorities to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations. The application is also accompanied by a Transport Statement prepared by Apex Transport Planning containing census data that evidences that car ownership levels tend to be lower for flats and affordable dwellings than open market properties. As such, the provision of 1 space per dwelling is considered to be acceptable.

#### **Biodiversity**

- 7.31 This Pre-application Consultation is accompanied by an Ecological Impact Assessment prepared by GE Consulting. It concludes that, subject to the implementation of the recommended measures for habitat retention, creation and enhancement, no significant reduction in the ecological interest of the Site or its surrounds is likely to arise as a result of its development.
- 7.32 It is therefore considered that, beyond the normal requirements to avoid impacts on protected species and maintain key elements of the habitat resource of the Site and its surrounds, there appear to be no overriding nature conservation constraints that would preclude the development of the Site in accordance with criterion Policy CW4 (Natural Heritage Protection).

#### Other materials considerations

## Green Infrastructure

- 7.33 As identified above in relation to criterion G of Policy SP6 (Placemaking), the site layout demonstrates how the quantum of development proposed can be accommodated whilst ensuring that as much existing green infrastructure on site as possible can be retained. Notwithstanding, the accompanying Green Infrastructure Strategy identifies that removal of existing features will be limited to Category U trees and a small area of scrub; the hedgerow is proposed to be retained, subject to detailed design of the retaining structures. In accordance with the recent updates to Chapter 6 of PPW, compensatory landscape planting will be provided throughout.
- 7.34 In light of the above, the development is considered to be in accordance with Policy CW6 (Trees, Woodland and Hedgerow Protection) of the adopted LDP.

# Conclusion

- 8.1 This Planning Statement has been prepared on behalf of Castell Group in relation to the proposed full planning application for the proposed residential development and associated works at the former Aneurin Labour Club along Heol Aneurin in Caerphilly.
- 8.2 The surrounding land immediately adjacent to the site is varied but it sits within the wider residential area of Penyrheol. As such, residential use of the site represents a conforming land use.
- 8.3 Policy CW 8 seeks to protect against the loss of community and/or leisure facilities however it should be emphasised that the Labour Club has recently been demolished following an arson attack, therefore we believe that the proposals do not result in the loss of a community facility (as it has already been lost). Notwithstanding, the proposals have been reviewed against Policy CW8 to demonstrate its compliance with the Policy in accordance with comments received from officers during pre-application discussions.
- 8.4 The proposed development is also considered to be acceptable in respect of the impact on the character and appearance of the area, biodiversity, and highways, access and parking in accordance with LDP Policies SP6 (Placemaking), CW11 (Affordable Housing Planning Obligation), CW6 (Trees, Woodland and Hedgerow Protection), and Policy CW4 (Natural Heritage Protection).
- 8.5 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.
- 8.6 The proposals therefore comply with the relevant national and development plan planning policies and supplementary planning quidance.