

Clydach Vale ALN

Planning Statement

October 2024, PAC Draft



theurbanists

Contents

1. Introduction	3
2. The Development Site and Development Proposals	5
2.1 The Development Site	5
2.2 The Proposed Development	6
3. Planning Context	8
3.1 Legislation	8
3.2 National Planning Policy	9
3.2 Local Planning Policy	13
4. Planning History	16
5. Planning Appraisal	17
6. Conclusion	19

1. Introduction

This planning statement has been prepared to consider the development of an English Medium ages 3 to 19 special school on land in the Clydach Vale, located west of the settlement of Tonypany in Rhondda Cynon Taf County Borough. The new special school will provide education for pupils with a range of additional learning needs (ALN) including autistic spectrum disorders, severe learning difficulties, profound and multiple learning difficulties, social, emotional, and behavioural difficulties, and sensory impairment.

The statement describes the development site and the emerging scheme proposals; sets the relevant planning context (based on national and local planning policy and the site's planning application history); and concludes by identifying the key material planning considerations and how they have been addressed in this proposed schemes planning application.

Figure 1: Aerial view of the surrounding area (the site location indicated approximately by blue circle).



This planning statement is supported by the wider planning application content, which includes:

- Site location plan
- Existing site layout plan
- Topographical Survey
- Proposed site layout plans
- Proposed building elevations and sections
- Proposed floor plans and roof plan
- Hard and soft landscape plans
- Landscape strategy plan
- Boundary treatment plans
- Drainage design and proposed site levels plan (including drainage strategy)
- Lighting design and LUX mapping
- Tree removal/protection plan
- Design and Access Statement
- Planning Statement
- Preliminary Ecological Appraisal
- Preliminary Bat Roost Assessment
- Green Infrastructure Statement
- Tree Survey, Tree Protection Plan, and Arboricultural Impact Assessment
- Transport Statement
- Travel plan
- Archaeology Desktop Report
- Phase 1 Desktop Ground Investigation Report
- Phase 2 Site Investigation Report
- Coal Mining Risk Assessment
- Noise Survey
- Planning application forms, statutory notices, and certificates

2. The Development Site and Development Proposals

2.1 The Development Site

The site is located in the Vale of Clydach. The site was formerly a Council premises, accommodating a series of pavilion-type buildings and in a business-park type setting. Those buildings have recently been demolished and the site is now hard standing, consisting of access roads, parking areas, and the former building plateaus. The site is bound to the west and south by dense woodland areas and to the north by a strip of further woodland, with further vegetation cover and other built areas to the east. Further north is the Clydach Vale Country Park, an important local amenity resource. To the east is the Cambrian Industrial Park which includes warehousing, light industrial, and distribution uses. The site has an existing vehicular access point from the northeast corner. This road connects to a local highway route that serves the site, Industrial Park, Country Park, and further sports and recreational facilities located in the local area. The highway route connects to the A4119, a strategic highway that provides access to Tonypany and the wider County Borough.

The wider residential settlement of Clydach Vale is located north of the site and Country Park. The various residential streets slope up the valley side looking back down to the site. There is a highway connection to the settlement from the same local highway route that serves the site.

Figure 2: Aerial view of site location. The buildings shown and the building-adjacent trees have recently been removed, separate to this proposal.



2.2 The Proposed Development

The proposed development is for a new English medium 3 to 18 special school. The school will accommodate 176 pupils and have roughly 113 staff (to be confirmed), both full-time and visiting staff. The new school building will be located centrally on the site with age-appropriate and needs-based external play and learning areas allocated around the building. The proposed parking (79 spaces) will be located in the east of the site and will be directly served from the existing access. An existing internal highway access route that is located along the northern boundary of the site and provides access from the eastern entrance to the western boundary is to be retained for school use only. The existing woodland area and trees located around the boundary of the site are to be largely retained, as is the SINC habitat located on the western edge of the site. The proposals include a sustainable drainage design that will ensure existing run-off rates are as a minimum maintained. Further amendment and proposed clearance around the southern flowing ditch would help ensure this.

Figure 3: Proposed site plan.

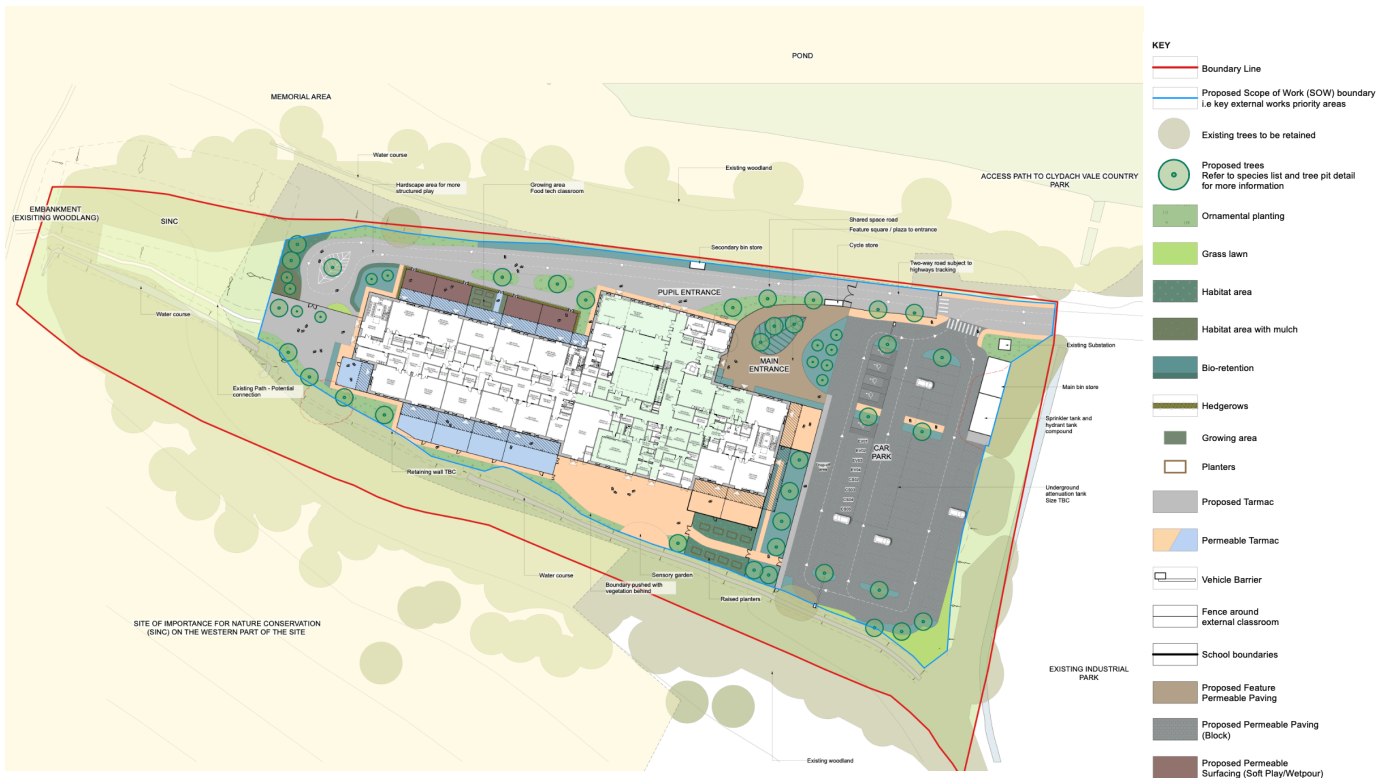


Figure 4: Proposed building elevations



3. Planning Context

3.1 Legislation

The Wellbeing of Future Generations (Wales) Act 2015

The Wellbeing of Future Generations Act places a requirement on statutory bodies to safeguard the wellbeing of future generations against those of current generations when public decisions are being made; meaning development proposals must be demonstrated to meet the needs of current generations, whilst safeguarding the needs of future generations. Sustainable development is the means to achieve this as defined in Planning Policy Wales.

Figure 5: Wellbeing of Future Generations Goals.



3.2 National Planning Policy

The key national planning policy that provides material context to the proposed development is comprised of:

- Planning Policy Wales (Ed. 12)
- Future Wales: The National Plan 2040

These policy documents place a presumption on sustainable development and identify placemaking as the statutory process to achieve such development. **Planning Policy Wales** (PPW) identifies a series of placemaking themes that developments are expected to meet.

Figure 6: PPW Placemaking Themes.



The updated (2024) chapter 6 had been initially set out in guidance, titled 'Addressing the nature emergency through the planning system: update to Chapter 6 of Planning Policy Wales' (2023). This has now been incorporated into the Edition 12 of PPW.

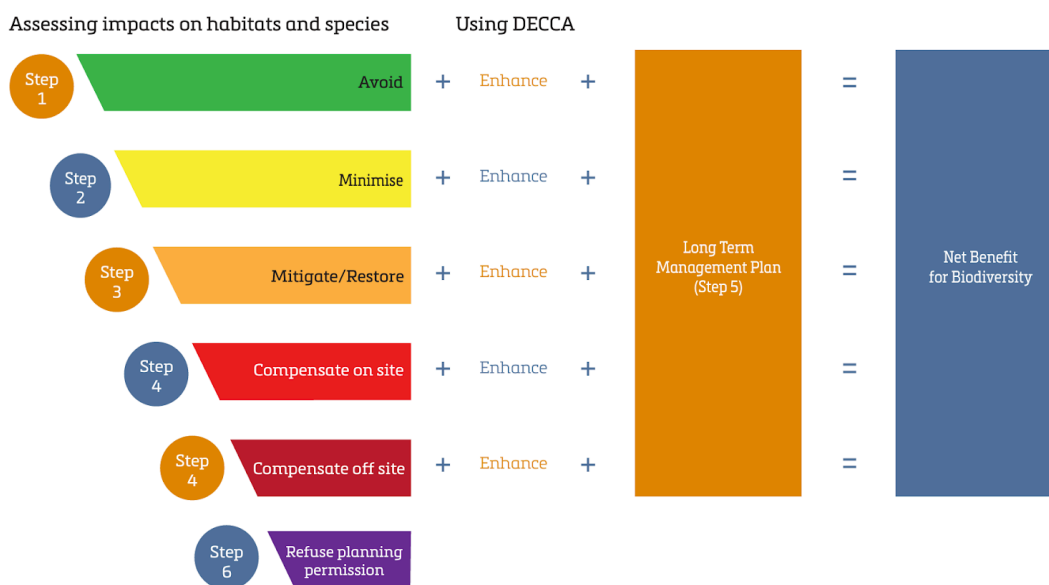
The main Chapter 6 changes to policy requirements are:

Green Infrastructure: A stronger emphasis would be placed on a proactive approach, covering cross-boundary consideration, identifying key outputs of green infrastructure assessments, the submission of proportionate green infrastructure statements with planning applications, and signposting Building with Nature standards.

Net Benefit for Biodiversity and the Step-wise Approach (see Figure 7 below): Off-site compensation is acknowledged as a last resort, and the need to consider enhancement and long-term management at each step is recognised. Green Infrastructure statements are set out as a requirement to demonstrate the ‘step-wise approach’ i.e. avoid, minimise, mitigate/restore, compensate on-site, compensate off-site. This links to the DECCA framework of ecosystem resilience to evidence adequate enhancements (Diversity, Extent, Condition, Connectivity and resultant Adaptation/resistance/recovery aspects).

Trees and Woodlands: a close alignment is taken with the step-wise approach, as well as promotion of new planting as part of development based on securing the right tree in the right place. For any trees that may be removed as part of a proposed development, consideration of their GI value including carbon, landscape amenity and ecological resilience sets a baseline from which a proportionate ratio of planting compensation shall be considered. Furthermore, the prescribed minimum ratio or areas of tree cover to compensate for any tree/woodland loss should be regarded.

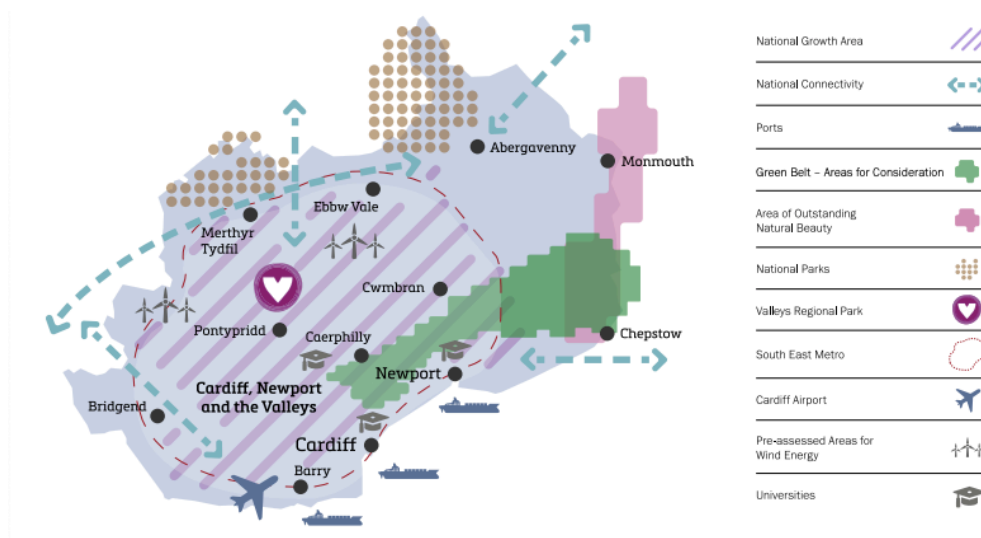
Figure 7: Summary of the Step-Wise Approach.



Future Wales: The National Plan 2040 established a series of key development policies to guide development; it also established growth areas across Wales. Tonypanydy and the development site are located in the south-east region which is a National Growth Area, allocated within Future Wales. Well planned and sustainable development is encouraged within the Growth Area.

Priorities include developing a vibrant economy; developing strong ecosystems; achieving decarbonisation and climate-resilience; and improving the health and wellbeing of communities. The plan also identifies 11 Future Wales Outcomes that collectively form a vision for our places. Those most relevant to the proposed development include distinctive regions that tackle health and socio-economic inequality through sustainable growth; towns and cities as a focus for sustainable growth; connected, inclusive and healthy places; places that sustainably manage their natural resources; places with biodiverse, resilient and connected ecosystems; places which are decarbonised and climate-resilient; sustainable travel; a requirement for a minimum of 10% of parking spaces to have electric vehicle charging points; promotion of prosperity, innovation and culture; and a thriving Welsh Language.

Figure 8: Future Wales, South-East National Growth Area.

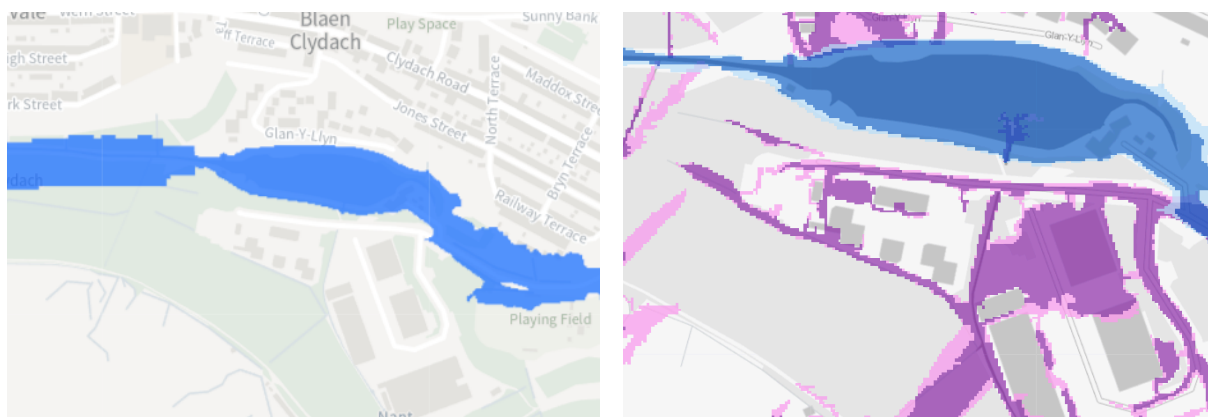


In addition to the above overarching development policy a series of Technical Advice Notes provide design guidance to development proposals. Those relevant to the development are identified below. These documents provide practical guidance that the school scheme will need to consider and apply as the design progresses.

- TAN 10: Trees Preservation Orders
- TAN 12: Design
- TAN 15: Development and Flood Risk
- TAN 16: Sport, recreation and open space
- TAN 18: Transport
- TAN 20: Planning and the Welsh Language
- TAN 21: Waste

TAN 15 is a particularly important document that is currently in the process of being updated. There are currently two versions of the flood maps; the Development Advice Map, which is the current statutory flood; and the Flood Maps for Planning, which have no formal status, but which are being used by Natural Resources Wales. The Flood Maps for Planning account for increased risk of flooding from climate change, and are to replace the Development Advice Map, but this process has been delayed while the flood modelling extents are being further examined by Welsh Government and Natural Resources Wales. The extracts of the maps below shows that the campus site does not fall within a fluvial flood risk zone in neither the Development Advice Map nor the Flood Maps for Planning.

Figures 9 and 10: Development Advice Map (left) and Flood Maps for Planning (right) of TAN 15



The maps show that parts of the site are susceptible to surface water flooding. These areas are located mostly along the edges of the site, with an area in the northwestern section also. Surface water flood risk shall be addressed through the drainage design for the scheme.

3.2 Local Planning Policy

Local planning policy is set out in the Local Development Plan for the Authority area. The Development is used to guide and control development providing the foundation for consistent and rational decision making. In doing so, it provides a measure of certainty about what kind of development would, and would not, be permitted in particular locations during the Plan period. The relevant plan for this development is the RCT Local Development Plan 2006-2021. The plan is in the process of replacement, the Preferred Strategy was placed out to consultation between February 2024 and April 2024. The Revised LDP 2022-2037 Preferred Strategy is available on RCTCBC website.

The LDP Map (see below) shows the Site of Importance for Nature Conservation which wraps around the entire site, shown by the green lines, this refers to Policy AW8. The grey lines indicate an area of Primary & Secondary Coal Resources. The site lies outside of the settlement boundary. There are no other constraints within the site shown on the Map.

Figure 11: Local Development Plan Map Extract



The following written policies from the Development Plan are relevant to the determination of a planning application for the proposed development:

Table 1: List of key Development Plan policies.

Policies	Policy / Development Requirements
CS1: Development in the North	The site is located within the Northern Strategy Area. The policy states that development in this area should help to build strong and sustainable communities. This includes reusing and redeveloping brownfield land; encouraging a strong, resilient, and diverse economy; and protecting the cultural identity of the area.
CS9: Waste Management	Development to include the provision of sustainable integrated waste management facilities.
AW2: Sustainable Locations	Development proposals will only be supported in sustainable locations. These sites can be identified as having good access to key services and facilities, support the roles of key settlements and are well connected to existing infrastructure and deliver improvements to services where necessary.
AW4: Community Infrastructure & Planning Obligations	Planning obligations may be sought where development proposals require the provision of new, improved services and facilities in order to make the proposal acceptable in land use planning terms. These include Open Space, highway infrastructure and landscape improvements.
AW5: New Development	Development will be supported where: The scale, form and design of the development would have no unacceptable effect on the character and appearance of the site and surrounding area or the neighbouring occupiers. The development would also be accessible to the local and wider community by a range of sustainable modes of transport.

Policies	Policy / Development Requirements
AW6: Design and Placemaking	Proposals will be supported where they are of a high standard of design, landscaping and planting play an integral role in the scheme and enhance the immediate and wider context. The proposals should also include an efficient use of land.
AW7: Protection and Enhancement of the Built Environment	Development proposals which impact upon sites of architectural/ historical merit will only be permitted where it can be demonstrated that the proposal would enhance or preserve the character and appearance of the site.
AW8: Protection and Enhancement of the Natural Environment	Rhondda Cynon Taf's distinctive natural heritage will be preserved and enhanced by protecting it from inappropriate development. Proposals will be permitted where they would not cause harm to features of sites with a nature designation.
AW10: Environmental Protection and Public Health	Development shall not be permitted where they would cause or result in a risk of unacceptable harm to health or local amenity because of air, light or noise pollution, flooding or any other identified risk to the environment, local amenity or public safety.
AW14: Safeguarding of Minerals	The following mineral resources shall be safeguarded from any development that would unnecessarily sterilise or hinder their extraction.

Supporting the Adopted Local Development Plan are a series of Supplementary Planning Guidance documents. Those relevant to the proposed development are listed below. These can shape the detailed design of the development as it progresses.

- Design and Placemaking (March 2011)
- Nature Conservation (March 2011)
- Access Circulation and Parking (March 2011)

4. Planning History

A summary of some of the key planning records for the development site and immediately adjacent area is below. It reflects the site's prior use as Council premises and the operation of adjacent business premises in the Cambrian Industrial Park.

- 24/0231/DEM: Prior notification of proposed demolition of all buildings on site (former RCTCBC head office- 3 no. two storey offices, 2 no. single storey offices, training suite, security lodge and 2 no. garages). Granted (09.04.24)
- 12/1200/FUL: Land to the side of unit 2 to be converted to car parking for use by Royal Mail unit adjacent to the site. Granted (15.02.13)
- 05/0726/GREG: Installation of air conditioning units to the rear of Pavillion B. Granted (07.06.05)

5. Planning Appraisal

The application site is located outside of the settlement boundary as defined in the LDP, but is brownfield in character and previously developed land. It is also located within a National Growth Area identified in national policy. The location of the development is therefore deemed to be sustainable, representing a good use of land and meet planning policy, including local policy NSA16.

The site has already been cleared of the previous Council buildings that were located there. As part of the prior approval process for that demolition, an ecological assessment was undertaken and appropriate protected species surveys (bats) were completed. Combined, this work identified the limited ecological sensitivity on the site and that the buildings were suitable for demolition. As the design of the scheme has progressed, the ecological assessment has been updated to ensure the proposed design of the new school is appropriate. This includes protecting the SINC designation around the site, retaining the principle of woodland boundaries and ensuring that artificial light levels would be minimised. As part of the development, new green infrastructure is to be provided on the site. This would be multi-purpose, having amenity benefits for staff and pupils, helping to manage surface water sustainably and delivering biodiversity value. On this basis, it is deemed the development would be sustainable on nature conservation and biodiversity grounds.

The architectural design of the new school building would be modern and of a high visual quality that is befitting of an outstanding education premises that would serve both current and future generations. The scale and massing of the building is appropriate to the site, with existing woodland planting screening views and ensuring that it does not detract from key views in the wider landscape. The school building would be energy efficient and be Net Zero Carbon. In light of these design approaches it is deemed the development would represent high quality placemaking as required in national policy and policy AW6 of the Development Plan.

As the site is previously developed land, contamination and remediation is a key consideration. To understand the ground conditions a comprehensive programme of site investigation has been undertaken to frame the design and has helped to shape an appropriate programme of remediation that would be undertaken as part of the site. Details of the remediation strategy in relation to previous coal working under the site have also been

produced. This would ensure that prior contamination and any potential for ground instability is fully remediated so that the site is fully safe on human health and environmental grounds. This work and approach shall ensure that the development meets local policies AW7, 8 and 10.

Inherent benefits of the proposed school, as well as the proposed works that would support the policies above, mean the sterilisation of any remaining coal resource at the site is necessary. This is positively encouraged by other environmentally focused policies, national policy, and global needs, and therefore is completely necessary and in accordance with policy AW14.

Given the nature of the development, where staff and students would arrive from across the County Borough, the development would need suitable means of vehicle access and parking. A suitable parking number has been accommodated on the site and the site benefits from strategic highway connections that are able to support the new school without undue impact on the wider operation of the highway network. Sustainable travel would also be supported as part of the development; appropriate active travel infrastructure would be provided in the development site to encourage active travel and the site would be served by high quality and well lit footpaths. Organised school transport would be used to minimise private car journeys for pupils and supported by a separate drop-off area, and car sharing would be encouraged amongst staff. A Travel Plan has been prepared for the site, to promote sustainable travel choices when the school is in operation. To facilitate the development, a stopping up order would be required, and this would be pursued following the grant of planning permission with the Highway Authority.

6. Conclusion

The principle of developing the proposed education use at the former Council premises in Clydach Vale is considered sound on planning policy grounds. While the site is located outside of the settlement boundary, it is previously developed land and would provide a much-needed education use that will meet the needs of both current and future generations.

The development site has been provided to the applicant with the previous buildings demolished and some trees removed. The woodland that surrounds the site, including the SINC, will be protected as part of the development and there would be further internal landscape enhancements. The latter would integrate into the scheme's Sustainable Drainage Design which will provide further biodiversity and amenity benefits as required by the SAB process. Concerning protected species, the appraisal undertaken for the site required bat surveys of the original site buildings before demolition was completed, which recorded no roosting bats were present. The lighting design applies a pragmatic approach to lighting across the site, ensuring pupil and staff safety during operational hours, but also applying controls to minimise light spill into the woodland areas around the site.

The proposed school would be largely reliant on the use of private vehicles as the school will not only serve a local catchment but will be a key County Borough educational asset with teachers and pupils arriving from across the district. However, the principles for maximising sustainable travel have been established in the application, with opportunities for car sharing, organised school transport, and active travel infrastructure are included within the scheme.

The architectural approach proposed is simple and contemporary, a suitable response to the site, ensuring that there would be a significant increase in the placemaking quality of the site. The building design would work with the external spaces to provide an exemplary special needs learning environment. The building would also be sustainable and in accordance with Net Zero Carbon principles.

In light of the above, it is considered that the scheme is considered to represent sustainable development and good placemaking that meets relevant national and local policy. On these grounds it is considered that the development is suitable for the grant of planning permission.