

Planning Statement

Incorporating

Design and Access Statement

January 2024

Proposed residential development

Land off A483, Llandrindod Wells, Powys

1. Summary

1.1 This Planning Statement, which also incorporates the mandatory Design and Access Statement (DAS), supports an application for full planning permission for a residential development scheme on land off the A483 in Llandrindod Wells, Powys.

1.2 The statement(s) assesses the scheme against prevailing local and national planning policy, and explains the design and access principles and concepts that have been applied to the various aspects of the proposed development, concluding that the application should be supported in that it promotes the delivery of sustainable development.

1.3 The statement also takes full account of pre-application advice received from the local planning authority (LPA) under ref. 23/0088/PRE in July 2023.

2. Site description

2.1 This generally flat half-hectare site is currently in no particular overall use, representing an enclosed area of maturing scrubland with trees and vegetation on the northern periphery of the town adjacent to and on the western side of the A483 trunk road. There are existing gated accesses into the site from the U1654 no-through-road (albeit with pedestrian access maintained to the south into the town) which serves the site, together with a number of existing properties and railway yard, itself accessed directly off the trunk road in this location. At its northern end, the site also accommodates an existing sewage pumping station and electricity sub-station surrounded by security fencing.

2.2 In terms of constraints, the central part of the site is affected by a culvert and 6m wide easement. There is also a 15m offset zone required in connection with the pumping and sub stations. In other respects, the site is bordered by the trunk road to the east and the Heart of Wales railway line to the west, creating potential noise and air quality issues to have regard to.

2.3 Otherwise, the site is largely unaffected by any other constraints, there being no designated heritage assets nearby, nor public rights-of-way. In addition, save for the fact that part of the site can experience occasional surface water accumulations, it is some way distant from any identified flood risk zone. Furthermore, whilst the site is identified as an area of amenity greenspace in the Powys Local Development Plan (LDP) background papers, it performs no specific function in this regard other than through its undeveloped nature and appearance (see below for further consideration of this aspect). Finally, the site lies within the River Wye Special Area of Conservation (SAC) catchment where strict controls exist over any increased phosphates levels.

2.4 Further relevant detail is included in the DAS section of the statement below.

3. Proposed development

3.1 The application is made in full and proposes the residential development of the site, in a linear arrangement facing onto the unclassified no-through-road to the west from where a combination of both single and shared access is taken for each of the proposed 13 new 2, 3 and 4-bedroom dwellings; three detached and five pairs of semi-detached, two of which (i.e., four dwellings in total representing a contribution of 30%) would be provided as on-site affordable housing. All dwellings have private rear amenity/garden space delineated by fencing and frontage car parking in line with current CSS standards. Garaging is also proposed for some of the dwellings.

3.2 The scheme is shown in details on the submitted plans and drawings. The application is also supported by a series of separate assessment reports covering air quality, traffic generation, noise impact and ecology, all of which have determined that the proposed development is fundamentally acceptable. Details relating to green infrastructure are also provided, together with proposals for external lighting, landscaping and biodiversity enhancements.

3.3 The scheme has been designed to ensure that both the central culvert easement and required separation area from the pumping and sub stations remain accessible and undeveloped; respectively, larger gardens for two properties either side and an area of open space are proposed. In density terms, with a developable area of 4240m², the proposed level of development equates to approximately 31 dwellings per hectare, thereby making the most efficient use of the site possible.

3.4 The site is served by mains drainage. In surface water terms, the scheme will be subject to a separate sustainable drainage (SuDS) approval process (SAB). A new turning head is also proposed to aid manoeuvrability by larger vehicles accessing the U1654 no-through-road, such as refuse wagons. A new 2m wide footway is also proposed along the site frontage to connect into the existing footpath into town in this location.

3.5 Further relevant detail is included below in the DAS section of the statement.

4. Legal context

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purposes of making any determination under the Planning Acts, which it must do by virtue of Section 70(2) of the Town and Country Planning Act 1990, the determination must be made in accordance with the plan unless material considerations indicate otherwise. Section 38(5) of the Planning and Compulsory Purchase Act 2004 states that if, to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).

4.2 The Planning (Wales) Act 2015 introduces a statutory purpose for planning, requiring any statutory body carrying out a planning function to exercise those functions in accordance with the principles of sustainable development, as set out in the Well-being of Future Generations (Wales) Act 2015. The Act provides a definition of sustainable development, meaning 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.

4.3 Section 6 under Part 1 of the Environment (Wales) Act 2016, known as the 'Section 6 duty', which requires public authorities to seek to maintain and enhance biodiversity in the exercise of their functions, including the planning function, and in so doing promote biodiversity and the resilience of ecosystems, so far as consistent with the proper exercise of those functions.

4.4 In terms of relevant secondary legislation, the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended) sets out that a DAS is required for all 'major' schemes such as this. Article 7(4) states that a DAS must:

- (a) Explain the design principles and concepts that have been applied to the development;
- (b) Demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;
- (c) Explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and
- (d) Explain how any specific issues which might affect access have been addressed

4.5 Relevant detail is included in this statement.

5. Development plan

5.1 The statutory development plan for the purposes of 'Sections 38(5) and (6)' above comprises two documents, namely:

- The National Plan 2040 (Future Wales) – published by Welsh Government on 24 February 2021. It is now part of the development plan for all of Wales, meaning decisions on planning applications will need to accord with its policies, so far as material to the decision.
- The Powys Local Development Plan (LDP) – adopted by Powys County Council on 17 April 2018. It came into effect as (now part of) the statutory development plan for the area on that date, setting out the policies and proposals for development in the County from 2011 to 2026.

5.2 Policy 1 of Future Wales (*Where Wales will grow*) sets out the Welsh Government's support for sustainable growth in all parts of Wales, stating that development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need. Policy 2 (*Shaping Urban Growth and Regeneration - Strategic Placemaking*) states that the growth and regeneration of towns 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.

5.3 Strategic Policy SP1 of the LDP (*Housing Growth*) refers to the positive contribution of housing on windfall sites in meeting the identified housing need. Policy SP3 (*Affordable Housing Target*) seeks the provision of affordable housing as part of the overall mix. Policy SP5 (*Settlement Hierarchy*) sets out the County's sustainable settlement hierarchy as: Towns, Large Villages, Small Villages, Rural Settlements and Open Countryside. Llandrindod Wells is designated as a Town, placing it at the top of the hierarchy. Policy SP6 (*Distribution of Growth across the Settlement Hierarchy*) seeks to direct a higher proportion of all new housing development to Towns, including through development on

suitable sites within the development boundary, such as the application site. Policy SP7 (*Safeguarding of Strategic Resources and Assets*) seeks no adverse impact on the County's assets.

5.4 Development Management Policy DM2 (*The Natural Environment*) requires proposals to demonstrate how they protect, positively manage and enhance biodiversity interests, including improving the resilience of biodiversity through the enhanced connectivity of habitats within and beyond sites. Policy DM3 (*Public Open Space*) states that the loss of any existing area of identified open space will only be permitted when certain criteria are met. It also states that provision for new Open Space will be sought from all housing developments of 10 or more dwellings, the type and nature of which will be determined by the deficiencies identified in the Open Space Assessment for the locality and, depending on the individual circumstances, may be provided on or off site. Policy DM13 (*Design and Resources*) states that development proposals must be able to demonstrate a good quality design that has regard for the qualities and amenities of the surrounding area, local infrastructure and resources.

5.5 Topic-based Policy H1 (*Housing Development Proposals*) seeks the most sustainable locations for residential schemes. It states at Criterion 1 that in Towns and Large Villages, and in order to meet the aims of relevant strategic policies (SP1, SP3, SP5 and SP6 above), housing development will be permitted on suitable sites within development boundaries, as in this case. Policy H3 (*Housing Delivery*) states that housing development proposals must be of an appropriate scale and shall provide a suitable mix of housing types to meet the range of identified local housing needs. Policy H4 (*Housing Density*) seeks the most sustainable and efficient use of land, meaning 27+ dwellings per hectare for Towns and Large Villages. Being within Central Powys, Policy H5 (*Affordable Housing Contributions*) seeks a 30% contribution towards affordable housing provision on schemes proposing five or more dwellings.

Assessment against the LDP

Principle

5.6 As a residential development scheme on a site located within the Llandrindod Wells development boundary, the proposals are demonstrably acceptable as a matter of principle, subject to compliance with all detailed aspects of policy.

Detailed considerations

Loss of amenity greenspace

5.7 The pre-application advice received from the Council goes into some detail on this point, noting that the site is identified as amenity greenspace in the Open Space Assessment 2018 associated with the LDP. However, the advice also confirms that the site being identified in this way does not preclude it from being developed, provided the loss can be justified in line with Policy DM3. The circumstances in which any such loss can potentially take place are where 1) there is an excess of such provision in the area, 2) there is no longer a requirement for that type of open space in the area, and 3) the site would not be suitable to provide an alternative type of open space for which there is a shortfall. An alternative 4th criterion is where it can be demonstrated that alternative provision can be made available that is of enhanced or equivalent community benefit in terms of its size, characteristics, location and accessibility.

5.8 The narrative supporting the policy makes it clear that any type of open space must be accessible to the public. Indeed, in the Open Space Assessment, amenity greenspace is taken to include all maintained green spaces within settlements; normally areas of regularly mowed improved grassland, and which can include picnic areas, village greens and areas surrounding existing play and sports facilities.

5.9 As such, a fundamental aspect of amenity greenspace is that it is easily accessible, providing multi-functional leisure opportunities for the public. The first point to make is that whilst the existing gates might make it physically possible for the site to be accessed, by some at least, it falls far short of meeting the definition set out within the assessment. The overriding impression of the site is that it is in fact inaccessible, meaning its actual value is in its visual appeal. Indeed, the assessment describes the site as 'business park verge', suggesting that it performs some form of open space setting for the Heart of Wales Business Park. However, as an area that could be described as unkempt, this appears somewhat less than accurate. Furthermore, the site cannot reasonably be considered accessible from the business park in any event, nor that it relates to it in any meaningful way.

5.10 On this basis, the only realistic conclusion is that the site has been identified in this way in that it provides some form of green setting for the approach to Llandrindod Wells in this location. Its value in this sense is understood and appreciated. However, that is evidently not the purpose for inclusion of 'amenity greenspace' in the Open Space Assessment. It has to perform some function in terms of providing leisure pursuit opportunities for the public. The site does not readily provide such opportunities, meaning that the protection afforded by Policy DM3 cannot reasonably be maintained.

5.11 Furthermore, in considering the criteria in Policy DM3 against which losses can be justified, in particular where there is an excess of such provision in the area, it is clear from the assessment that *"...Llandrindod Wells has a wealth of open spaces including Public Parks and Gardens, one wildlife trust reserves (within the settlement), one local nature reserve and a woodland that is privately owned but with public access. In addition to this there are several areas of amenity greenspaces particularly around the sports facilities."* The target area to serve the town is stated as 10.70ha whereas the total available area is quoted as 61.75ha. Given such an abundance of provision elsewhere within the town, together with the peripheral location of the site, the town would demonstrably remain amply served by existing, more useable, and more accessible, informal open space in the event that the site was developed.

5.12 In light of all the circumstances, it is considered that the loss of this area of identified open space can justifiably take place without detriment to the town.

Open space provision

5.13 Policy DM3 also seeks new open space provision from all housing developments of 10 or more dwellings. The type and nature of that which is to be provided will be determined by the deficiencies identified in the Open Space Assessment for the locality and, depending on the individual circumstances, it states, may be provided on or off site. The scheme proposes an area of open space, the purpose of which has taken account of the fact that the only noticeable deficiencies identified in the assessment for Llandrindod Wells relate to Designated Equipped Playing Space. This includes Local Equipped Areas of Play (LEAP).

5.14 Applying the assessment's standard of 0.25ha per 1000 population is challenging for a relatively small (albeit major) development such as this. Nonetheless, on the assumption that (2.4 people x 13 dwellings) 31 people would live in the new homes, an area of 78m² is needed. An area of 262m² is proposed. The applicant is happy to discuss further the exact function and future maintenance of the open space with the Council but suffice to say at this stage that the proposed scale of provision is considered appropriate for the size of development proposed, and would suitably enhance community benefit.

Design, character and appearance

5.15 The layout of the site determines the configuration of the proposed development. A linear scheme has resulted, which ensures the best arrangement in terms of maximising visual interest, accessibility and providing private useable amenity/garden space. The rhythm of development

together with the use of alternative and contrasting external finishes and materials enhances how the scheme will be perceived in the public realm. The character of the overall frontage works well when viewed from the U1654 no-through-road, as demonstrated by the submitted streetscene drawing included on the proposed block plan. Admittedly, the view from the A483 trunk road will be of the rear of properties. However, there will still be evident punctuation, and scope for additional landscaping, to help soften the appearance of scheme which, together with the existing dense vegetation and mature trees to be retained along the main roadside verge, will enhance the contribution the site makes as a gateway feature when approaching the town from the north.

5.16 In all other respects, the scheme is considered to be attractively designed, providing a mix of new homes in a cohesive manner and with a consistent character, and in a way that respects the appearance of the site and its surroundings, thereby creating an environment fit for purpose in the locality.

Density

5.17 The proposed density is in excess of the 27+ dwellings per hectare sought by Policy H4. As such, the scheme makes the most efficient use of the site possible whilst taking account of constraints, delivering a range of dwellings for the local community including the full required provision of affordable housing.

Affordable housing

5.18 On the basis that 13 new units of residential accommodation are proposed, there is a policy requirement for 4 units to be provided as affordable housing, on-site, or the equivalent in terms of either off-site provision or via a commuted sum payment. The application includes the provision of 4 new affordable homes, on-site, thereby meeting the requirements of LDP policy and the Council's Affordable Housing Supplementary Planning Guidance (SPG - see below).

Highway safety, accessibility, parking and transportation

5.19 The application takes account of pre-application advice received from the local highway authority. The new access arrangements proposed are considered to meet all relevant standards, as is car parking provision. A new turning facility is provided for users of the U1654 county highway and a 2m wide footway is proposed to link with the existing pedestrian footpath into town, thereby ensuring connectivity, accessibility and permeability allowing meaningful active travel options. The application is also supported by a vehicle trip generation assessment.

Impacts on living conditions

5.20 The proposed layout shows how a detailed scheme can be designed to achieve an acceptable living environment for new occupants whilst also protecting and maintaining the current level of amenity experienced by occupiers of existing properties. In addition, the application is supported by an air quality assessment and separate noise impact assessment, both of which demonstrate that the development is compliant with best practice guidance, regulatory standards and national planning policy on such matters.

Biodiversity

5.21 The application is supported by an assessment showing no undue issues in terms of ecological impacts, plus realistic scope for biodiversity enhancements.

Phosphates

A mains foul drainage solution would be deployed as the most sustainable for the site in phosphates terms, there being permitted phosphate-stripping capacity at the Llandrindod Wells Waste Water Treatment Works.

Overall

5.22 The proposed development will respect the character and appearance of its surroundings, having an acceptable level of visual impact. It is also well related and complementary to the area, offering an appropriate level of development in keeping with surrounding and adjoining land uses. Furthermore, it will not appear incongruous or out of keeping, nor will it undermine any existing attractive views or vistas, and will ensure the living conditions of future occupiers and neighbouring properties are maintained.

5.23 As such, the scheme will safeguard and enhance the appearance of the site and the contribution it makes, meeting all relevant and applicable detailed policy criteria in the process. It has also been demonstrated how the scheme will meet all other and complementary policy, procedural and regulatory requirements.

5.24 Overall, the proposals have been shown to comply with the overall strategy and approach of both Future Wales and the LDP, and how they also comply in terms of the more detailed aspects of policy. The scheme is, therefore, in accordance with the statutory development plan, taken as a whole.

5.25 Further relevant detail is included below in the DAS section of the statement.

6. Other material considerations

Planning Policy Wales - Edition 11 - February 2021 (PPW)

6.1 National policy set out within PPW has the promotion of sustainable development at its heart. Its overriding objective is to deliver social, environmental, economic and cultural prosperity for the country, looking to the planning system to help achieve this. It states that the planning system provides for a presumption in favour of sustainable development to ensure such factors are balanced and integrated in decisions taken on planning applications. It also explains how this approach is supported through legislation and that planning authorities, as public bodies subject to the requirements of the Well-being of Future Generations (Wales) Act, must exercise these functions as part of carrying out sustainable development.

6.2 Specifically, PPW states that in contributing to the goals of the Well-being of Future Generations Act, planning proposals and decisions should ensure that all local communities, both urban and rural, have sufficient good quality housing for their needs, in safe neighbourhoods and promoting access to employment, shopping, education, health, community, leisure and sports facilities, and open and green space, maximising opportunities for community development and social welfare. PPW also says that planning authorities should follow a search sequence when considering sites for housing, starting with the re-use of previously developed and under-used land and buildings within settlements, such as the application site.

6.3 Chapter 6 of PPW has recently been updated and published ahead of an anticipated all-new version of PPW. It sets out the need for a net benefit for biodiversity and for green infrastructure statements to be submitted with all planning applications to demonstrate how this will be achieved, proportionate to the nature and extent of development proposed. It also sets out a step-wise approach to show how any impacts on known ecological habitats has been avoided as a first step prior to

considering any necessary minimisation, mitigation and compensation. The need for enhancement cuts across all of these. It is considered that the proposals would not result in the loss of any such habitat. The application is additionally supported by details relating to green infrastructure which state that a length of hedgerow and one Oak tree will be removed and compensated for. A range of biodiversity enhancements is also proposed.

6.4 The proposals meet with the policies and principles of PPW.

Technical Advice Notes (TANs)

TAN 2 - Planning and Affordable Housing (June 2006)

6.5 TAN 2 sets out information and guidance relating to the delivery of affordable housing which the application is compliant with.

TAN 5 - Nature Conservation and Planning (September 2009)

6.6 The TAN provides advice and guidance in relation to ecological matters, which the scheme is considered to be compliant with.

TAN 11 - Noise (October 1997)

6.7 TAN 11 provides advice in relation to noise as a material planning consideration, which the application is compliant with.

TAN 12 - Design (March 2016)

6.8 At paragraph 2.2, TAN 12 confirms that the Welsh Government is committed to achieving the delivery of good design, which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales. At paragraph 5.11.3, it says that the design of the built form should reflect local context and distinctiveness. For the reasons outlined above, the scheme, in proposing the sensitive and sympathetic development of a sustainable site, meets these requirements and is compliant with TAN 12.

TAN 15 - Development and Flood Risk (July 2004)

6.9 The TAN includes advice in relation to flood risk matters which the scheme is compliant with.

TAN 16 - Sport, Recreation and Open Space (January 2009)

6.10 TAN 16 includes advice relating to the protection and provision of public open space which the application is compliant with.

TAN 18 - Transport (March 2007)

6.11 TAN 18 seeks development that has an appropriate impact on the highway networks and transport users, which the scheme is considered to be compliant with.

TAN 20 - Planning and the Welsh Language (October 2017)

6.12 TAN 20 provides advice and guidance in relation to the impact that development can have on the Welsh Language, seeking impact assessments where 'major' windfall schemes are proposed, and where the LPA has defined the locality as linguistically sensitive. Llandrindod Wells has not been defined in this way.

Supplementary Planning Guidance (SPG)

Biodiversity and Geodiversity - October 2018

6.13 The SPG provides advice and guidance in relation to ecological matters, which the scheme is considered to be compliant with.

Affordable Housing - October 2018

6.14 The SPG is concerned with the provision and delivery, and details, of affordable housing, which the scheme is compliant with.

Residential Design - January 2020

6.15 One of the main aims of the SPG is to improve design standards and layouts, encourage a mix of residential properties and create responsive environments, which are outward looking and connect with the community. The SPG is also concerned with local distinctiveness and sense of place, seeking developments which contribute positively to the local area, preserving the distinctiveness of the town in which it is proposed. In terms of legibility, the proposed development is well-related to existing development and its setting, thereby ensuring compliance with the SPG. In addition, any relevant prescriptive space and privacy standards are met.

7. Design and Access Statement

Design – overall

7.1 Policy DM13 of the LDP sets out the essential design criteria for all development proposals to meet, requiring good quality design to be demonstrated having regard for the qualities and amenities of the surrounding area, local infrastructure and resources. The following paragraphs explain the design principles and concepts that have been applied to the development and demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account.

Design principles and concepts

7.2 In terms of detailed design principles and concepts, the proposed scheme brings forward the development of a site situated within the development boundary and in a sustainable town location. The layout and scale of the development maximises available amenity space, whilst also ensuring a positive outlook and opportunities for solar gain through orientation. External appearance will be kept close to that which exists locally in order to ensure an appropriate level of change, and to create a sympathetic development that respects its setting.

7.3 The scheme has been designed to ensure attractive and safe private spaces with an open and accessible public facing realm, securing natural surveillance by design through the residential use of the site with clear and open aspects. In turn, this will aid crime prevention and social cohesion.

Appraisal of site context

7.4 The site is included within the identified development boundary for Llandrindod Wells. The character and appearance of the local area is mixed, but un-mistakenly that of a peripheral town location. The design successfully respects that existing character. Within this context, it can be seen how the proposed scheme will add to the existing mix of development locally, providing new development that respond positively to its location and setting.

Visual impact

7.5 As far as visual impact is concerned, careful consideration has been given to designing a scheme that makes the most efficient use of the site whilst respecting and responding to its setting, and whilst also ensuring the protection of amenities for future and adjoining occupiers. The development will ensure satisfactory levels of privacy and light and will also be visually unobtrusive and assimilated.

7.6 Overall, the layout, scale and appearance of the proposed scheme will respect the character and appearance of its surroundings, maintaining and adding to the existing mix of building types and styles in the locality and meeting all relevant and applicable policy and design criteria in the process. In addition, it will be well related in terms of density, offering an appropriate level of development in keeping with surrounding and adjoining land uses. Furthermore, in complementing the existing built form in this location, the proposed form of development will safeguard and enhance the site, its surroundings and wider context.

Landscape impact

7.7 The site is within the development boundary for Llandrindod Wells, as identified in the LDP, meaning that the visual effects of any development in this location have already been taken into account, in terms of any likely impacts on the wider landscape setting of the town. No contravention of Policy DM4 (*Landscape*) is therefore envisaged. Moreover, there is no basis on which to consider that a well-designed scheme in this location, as proposed, would have any unforeseen or additional impacts in this regard, and is therefore acceptable in this location.

7.8 In terms of any more localised landscape impacts, the well-designed scheme would complement the area. In addition, there is scope for new planting to further enhance the visual appeal and character of the area. Overall, a scheme that is both purposeful and acceptable in its own right, whilst also respecting the character of existing development and its wider setting, has been achieved, ensuring a development that will be complementary to the area.

7.9 Overall, the development will be seen as a logical addition to housing in the area, which will sustain and enhance local character by promoting a legible form of development that is clear and understandable. This will promote a successful relationship between public and private space, and provide for a quality development with choice and variety.

Environmental sustainability

7.10 Policy DM13 also requires all development proposals to address the principles of sustainable design. The proposals seek to achieve the most efficient use and protection of natural resources through the use of a site within the development boundary of an identified sustainable town location. Mains foul drainage is proposed as being the environmentally sustainable in line with Welsh Government Circular 008/2018. A suitable SuDS solution is also proposed, will be subject to future separate SAB approval. There would additionally be scope for the development to incorporate renewable energy solutions, as far as practicable, and the use of energy and water efficient fittings, etc. On this basis, the proposal represents an adaptive and flexible scheme that responds positively to social, economic and environmental factors.

7.11 In addition, the scheme has been designed so as to maximise solar gain in terms of living and amenity space. Together, all these various elements help reduce environmental impact and minimise demand for energy. The conversion and construction process will likewise be undertaken so as to minimise any such impacts. The units will also meet all applicable standards including any that are relevant under Part L of the Building Regulations.

Local environmental issues

7.12 New and appropriate arrangements for both foul and surface water drainage will be utilised, representing the most sustainable solution for the site, including in terms of phosphates. No other insurmountable local environmental issues or impacts are identified.

Biodiversity

7.13 Policy DM2 of the LPD (*The Natural Environment*) seeks no adverse impact on ecology and biodiversity assets. No adverse impacts or effects are anticipated, with ample scope for suitable enhancements. As such, the proposed development will not unduly adversely affect any ecological or biodiversity interest.

Access - overall

7.14 The proposal will achieve and promote sustainable means of travel by providing safe and clear connections within a sustainable settlement location, in close proximity to existing roads, footpaths, services and other facilities, offering residents the opportunity to utilise safe, convenient and attractive connections. No unacceptable increase in traffic is anticipated from the new development, which is unlikely, therefore, to have any undue adverse impact on highway safety.

Movement and accessibility

7.15 Policy T1 of the LDP (*Travel, Traffic and Transport Infrastructure*) seeks the safe and efficient flow of traffic for all transport users, including more vulnerable users, and especially those making active travel journeys by walking or cycling. It also requires any impacts on the network and the local environment to be managed and mitigated. In addition, it seeks to minimise the demand for travel by private transport and encourages the promotion and improvement of sustainable forms of travel in all new developments. As a housing scheme within accessible range of a number of local services and facilities, including by active travel means, the opportunity to improve and promote accessibility and reduce reliance on the private car has clearly and demonstrably been taken. The proposed development also takes full account of the needs of all transport users, including those with disabilities and mobility impairment.

Vehicular access

7.16 The vehicular accesses proposed are considered to meet all applicable and relevant standards.

Parking and turning

7.17 Policy DM13 states that development needs to be designed and located so as to minimise the impacts on the transport network - journey times, resilience and efficient operation - whilst ensuring that highway safety for all transport users is not detrimentally impacted upon. It states further that development proposals should meet all highway access requirements (for all transport users), vehicular parking standards, and demonstrate that the strategic and local highway network can absorb the traffic impacts of the development without adversely affecting the safe and efficient flow of traffic on the network, or that traffic impacts can be managed to acceptable levels to reduce and mitigate any adverse impacts from the development. The scheme achieves this.

7.18 In general terms, parking provision should be provided at the optimum level to support these policy aspirations, which can be achieved at the site. The parking aspects of the of the proposal are considered compliant with Policy DM13, the updated CSS Wales parking standards 2014 and the Active Travel (Wales) Act 2013.

Accessibility, permeability and sustainability

7.19 Llandrindod Wells and surrounding area is served by a network of trunk, local district, and a number of classified and unclassified roads. The proposed scheme will have very little impact upon any major traffic movements. The site is within walking distance of a number of local community and other services and facilities, schools and a broad array of public open space. Bus stops are also available nearby for regular services between towns and other destinations. Llandrindod Wells railway station is also accessible providing further sustainable travel options.

Inclusive design

7.20 The proposals promote an inclusive form of development, both in terms of accessibility and the nature and extent of new housing proposed. The site offers opportunities for safe level access to meet the needs of residents and visitors. In addition, the proposals will comply with all applicable standards including any that are relevant under Part M of the Building Regulations. Furthermore, the scheme provides for ease of access for emergency vehicles and offers clear connections for all transport users including pedestrians and cyclists, thereby meeting the requirements of policy.

8. Conclusions

8.1 The planning acts say that applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The legal starting point, therefore, is both Future Wales and the adopted LDP, which together comprise the statutory development plan for the area.

8.2 The proposed residential scheme is a good example of how a site within the designated development boundary of a sustainable town location can be successfully brought forward to provide much needed new housing, whilst also respecting its character and that of its surroundings. The proposal is sympathetic, attractively and simply designed to suit the location and wider setting. In addition, no harm is envisaged in any respect. As such, the application accords with both the strategic and more detailed policies of the LDP.

8.3 The proposals are likewise compliant with the Council's SPG and Welsh Government policy, guidance and advice, and all other relevant material considerations.

8.4 Overall, therefore, the proposals have been shown to represent a form of development that is environmentally, socially, economically and culturally sustainable, with no known constraints to delivery. PPW introduces a presumption in favour of such development. Whilst ultimately a matter for the planning authority, a decision to approve the application taken on the strength of the relevant arguments and weighing any competing and/or conflicting issues in the balance would be appropriate, in that it would represent a well-informed position reflecting a sound understanding of all relevant factors. Section 38(6) of the Planning and Compulsory Purchase Act allows for such a decision to be made.

8.5 Finally, there is a willingness to meet all essential requirements so that the Council can assess the suitability and sustainability of the proposed development. If further information is required, the applicant would welcome the opportunity to provide any additional clarification or evidence necessary, and would also be happy to discuss any appropriate conditions and/or planning obligations with the Council in order for the application to go forward with a positive recommendation.