

PLANNING STATEMENT

Land at Maesoffa, Four Crosses

March 2021



Summary

Proposal:

Outline planning application for residential development (all matters reserved apart from access)

Location:

Land adjacent to Maes Offa, Four Crosses

Date:

March 2021

Project Reference:

19.237

Client:

Powys County Council (Housing Services)

Product of:

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Introduction

- 1.1 This planning statement accompanies an outline planning application for residential development (all matters reserved apart from access) at land adjacent to Maes Offa, Four Crosses.
- 1.2 The planning application comprises the following set of drawings, prepared by George + Tomos Penseiri and Powys County Council

Drawing name	Drawing reference
Proposed Site Layout	PL01 C
Proposed Traffic Calming	P-0100_01
Topographical Survey	L_0000_01

- 1.3 In addition, the application is accompanied by the following supporting documents:

Document name (reference where appropriate)	Prepared by
Planning application forms (1APP)	Asbri Planning
Planning Statement	Asbri Planning
Preliminary Ecological Appraisal and Reptile Survey	Powys County Council
Noise Impact Assessment	Formant
Trial Trench Evaluation	Headland Archaeology

- 1.4 The purpose of this Planning Statement is to provide additional and complementary information to the planning submission. It provides a description of the application site at Section 2 and describes the pre-application discussions at Section 3. Section 4 outlines the proposed development. Section 5 sets out the planning policy context and Section 6 provides an appraisal of the development. The document then concludes under Section 7 with a justification of why planning permission should be granted.

Site Description

- 2.1 The site relates to a parcel of land immediately east of the A483 and west of The Street (U4908) within Four Crosses. The site currently lies redundant and comprises low lying vegetation. Notwithstanding, a mature hedgerow runs along the site's frontage and a cable transformer is situated in the site's south western corner with cables bisecting toward the north and east.
- 2.2 Given that the site is vacant, there is no defined access point. Notwithstanding, a pedestrian footpath flanks the carriageway to the front of the site. In addition, there are traffic calming measures positioned immediately to the front of the site
- 2.3 In terms of surroundings, residential dwellings; Maesoffa and Bryn-Offa are situated to the north and south of the site respectively. Whereas the aforementioned A483 runs parallel to the western boundary whilst agricultural land lies to the east.
- 2.4 A review of Natural Resources Wales' Development advice map reveals that the site lies within Flood Zone A, as such, is considered to be at little or no risk of fluvial or tidal/coastal flooding.
- 2.5 In terms of historical context, the site lies within close proximity to a number of historical assets including:
- The Four Crosses, Maes Offa milestone – A dressed milestone situated immediately to the front the site (Primary Reference Number: 87434)
 - Church of St Tysilio – A grade II building (CADW Ref: 8508) situated approximately 320m north of the application site.
 - Offa's Dyke – The site lies within close proximity to Offa's Dyke, a linear stretch of earthworks which runs along the Welsh/English border. It is designated as a Scheduled Ancient Monument (Ref: MG033).
- 2.6 Furthermore, a review of the Historic Environment Records reveals that The Street possibly follows the former alignment of a portion of Offa's Dyke. The site also lies within close proximity to recorded Bronze Age burial mounds.
- 2.7 The village of Four Crosses is largely residential, however, features a number of facilities including a convenience store and Petrol Filling Station. In regard to public transport, there is a bus stop situated along the A483 approximately 160m north of the site. A number of

services operate from the stop providing users with travel to a destinations including; Oswestry, Newtown and Wrexham.

Planning History

- 2.8 A review of Powys County Council's online search register confirms that there is no recent planning history of particular relevance associated with this site. Notwithstanding, the following applications relate to land to the east of the A483 opposite the site and are therefore considered relevant in the context of this application:

Ref: P/2017/1062

Description: Outline: Residential development, formation of vehicular access and access road, and all associated works

Decision: Refused 15th March 2018.

Ref: 18/0581/OUT

Description: Proposed affordable housing development, formation of vehicular access and access road and all associated works

Decision: Granted subject to S106 11th December 2019

- 2.9 The committee report for application ref 18/0581/OUT identifies that whilst the development initially included access details, the application was amended to remove highway considerations for future consideration as part of any reserved matters application. Therefore, the access considerations as part of application ref: 18/0581/OUT have no bearing on the application at land adjacent to Maes Offa.

- 2.10 In addition and as detailed in the following Section, the site has been subject to a pre-application enquiry relating to the proposed development.

Pre-Application Discussions

Pre-Application Enquiry

3.1 A pre-application enquiry was submitted by Asbri Planning on behalf of Powys County Council in October 2020. The pre-app enquiry was accompanied by a layout plan which demonstrated how the site could be developed to accommodate 4no. dwellings whilst delivering appropriate highway infrastructure. A response to the pre-app enquiry (Ref: 20/0153/PRE) was issued on 25th November 2020.

3.2 A summary of the response is provided below:

Principle of Development

The principle of residential use of the site is considered to be acceptable.

Affordable Housing

The development currently falls below the triggers to provide affordable housing provision. However, as noted below, the response considers that the site falls short on density and the number of units should be increased to 6 which would trigger an affordable housing requirement.

Density

Based on the scale of the site, the development should accommodate 6 dwellings to comply with the requirements of LDP Policy H4 (Housing Density)

In light of the above, the principle of development for the residential development is considered unacceptable. The number of units on site should be increased to 6.

Given that the A483 and U4908 run parallel to the site, frontage onto to both of these roads should be provided. This can be achieved through the use double frontage.

Scale and Design

Full elevation drawings will be required as part of a planning application.

Brickwork appears to be the most common external material in the area.

Impact to Neighbouring Properties

The development should comply with the requirements of the Residential Design Guide SPF in respect of overlooking and loss of daylight.

Highway Safety

The Highway Authority have no fundamental objection to the proposed development.

It is not feasible to remove/relocate a single feature the existing traffic calming on the U4908 without relocating all the others.

Consideration should be given to relocating the access, thus avoiding the creation of a crossroads with the consented residential site opposite.

Biodiversity

At a minimum a Preliminary Ecological Survey and Biodiversity Enhancement Plan are required.

Built Heritage

It is not considered that the proposed development is likely to cause an unacceptable harm upon the character or appearance of these heritage assets.

Scheduled Ancient Monument

Based upon the findings of the trial trench evaluations it does not appear the proposed residential development of this site would cause any archaeological disturbance or adversely impact upon any archaeological assets.

Environmental Health

Due to the proximity of the site to the trunk road, a noise assessment will be required.

Land Contamination

There are no recorded contamination issues with the subject site.

Sustainable Drainage System (SuDS) Approval Body (SAB)

The development will require SAB approval.

Pre-Application Meeting

- 3.3 Following receipt of the pre-application response, a meeting was held between the case officer, Asbri Planning and Powys County Council (Housing Services) on 1st December 2020.
- 3.4 The discussions were largely focused on the main issues identified within the pre-app response: density and highways which will be discussed in turn below.

Density

- 3.5 It was discussed that the development represented a reduction in the target density identified in Policy H 4 (Housing Density). Notwithstanding, it was emphasised during the meeting that the site's immediate surroundings were subject to a lower housing density. Paragraph 4.6.12 of the LDP states that density should take into account the character of the area.
- 3.6 Maes Offa, situated to the north, comprises one dwelling with an associated curtilage area of 0.14 hectare which represents a density of 7.2 dwellings per hectare. Similarly, Bryn Offa to the south also features just one dwelling with a curtilage area of 0.15 which constitutes a density of 6.7 dwellings per hectare. Furthermore, the Parc Hafod development within the centre of Four Crosses comprises a site area of approximately 3.21 hectares and 59 dwellings representing a density of 18 dwellings per hectare.
- 3.7 Whereas the proposed development comprises up to four dwellings on a site measuring 0.28 hectares which represents a density of 14.3 dwellings per hectare which is considerably higher than the density of immediate development. In addition, Four Crosses is characterised by lower density development.
- 3.8 An increase in dwellings numbers on the site could also take the development over the 5 dwellings off a private drive threshold which would mean that the access road would need to be designed to adoptable standards, thereby increasing road width, increasing access radii and increasing costs whilst the development will inevitably feel 'harder' and more road dominated and this would further exacerbate the difference in character between the development and immediately adjoining existing development.
- 3.9 The development has been informed by advice given by local agents who suggest that the site will generate most value through development as self-build plots. However, increasing density on the site and the requirement for adopted highways infrastructure is likely to make the site less suitable for self-builders who will prefer more spacious plots and may be put off by the added costs associated with the adopted highways which would need to be put in by a single contractor.
- 3.8 It was suggested during the meeting that a reduction in density may be acceptable given the character of the area and any on site constraints. Notwithstanding, any planning application would need to include justification for the reduction.

Highways

3.9 The response from the highways officer emphasised that consideration should be given to relocating the proposed access to avoid creating a crossroads with the access for the consented residential scheme (ref: 18/0581/OUT) on the east of the U4908. However, it was determined during the meeting and as discussed at paragraph 2.10, access details were removed from the consideration of the application and reserved for future determination. As such, there is no guarantee that the access arrangement proposed for application ref: 18/0581/OUT would be designed in such manner. Similarly, the application was granted subject to S106 in December 2019, which does not appear to have been signed and no formal decision notice issued, with no reserved matters application coming forward. As such, there is no guarantee that the scheme would be delivered. It is therefore unjustifiable for the proposed development, which includes access details, to amend its design based on a speculative scheme that may never be realised.

Proposals

- 4.1 The application seeks outline permission for residential development with all matters reserved apart from access.
- 4.2 The accompanying site layout plan, whilst indicative, illustrates that the site is capable of accommodating four semi detached dwellings with private amenity and parking areas and garages.
- 4.3 The access arrangement has been developed in consultation with Powys' Highway's Department and is therefore considered to be acceptable. Access is to be achieved via the site's frontage with a private drive extending centrally to serve all four dwellings.
- 4.4 It is acknowledged that a small portion of the hedgerow along the site's eastern boundary will be required to be removed to accommodate the access arrangement. However, as shown on the site layout plan, the development could be brought forward whilst retaining the vast majority of hedgerows. In addition, there is also scope for further landscape planting which will enhance the site's visual amenity and onsite biodiversity.
- 4.5 A new acoustic barrier is to be provided along the site's western boundary which runs parallel to the A483 to mitigate against the potential noise impact created by vehicles travelling along the highway network. In addition, units 3 and 4 have been positioned in such a manner that they shield the amenity spaces from the A road further reducing the potential noise impact of traffic. It is acknowledged that layout is a matter reserved for future determination, however the design principles to mitigate against noise impact can easily be accommodated within a reserved matters application.
- 4.6 Whilst the layout is indicative at this stage it is considered that the proposed development will accord with Powys County Council's adopted parking standards.

Planning Policy Context

Introduction

- 5.1 The planning policy framework for the determination of this planning application is provided by national planning guidance, together with the Powys County Council Local Development Plan (2011-2026), which was adopted on the 17th April 2018.
- 5.2 National planning policy guidance is contained within the eleventh edition of Planning Policy Wales (PPW), published by the Welsh Government in February 2021. PPW is supported by 21 topic-based Technical Advice Notes (TANs), a number of which are relevant to this application.

Planning Policy Wales

- 5.3 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 Well-being of Future Generations (Wales) Act 2015 and other key legislation. PPW and the National Development Framework (NDF) set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).
- 5.4 Sustainable development is defined as:

“Sustainable development” means 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. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. ”

- 5.5 Under Section 2 – People and Places – Achieving Well Being Through Placemaking, 5 Key Planning Principles are highlighted, under the general heading of *Achieving the Right Development in the Right Place* which are:

1. *Growing our economy in a sustainable manner*
2. *Making best use of resources*
3. *Facilitating Accessible and Healthy Environments*
4. *Creating and Sustaining Communities*

5. *Maximising environmental protection and limiting environmental impact.*

- 5.6 Paragraph 2.21 states that planning authorities should ensure that economic, social, cultural and environmental benefits are given equal consideration in the decision making process, by following the 5 ways of working, to ensure that a balanced assessment is carried out and to implement the Well Being of Future Generations Act and the Sustainable Development Principle. There may be occasions where one type of benefit outweighs others, and in such cases robust evidence should be presented to support these decisions.
- 5.7 Paragraph 3.3 emphasises 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.
- 5.10 Section 4 – Active and Social Places defines those places which promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities. Places which are active and social contribute to the seven goals of the Well-being of Future Generations Act.
- 5.11 This theme supports and enables the provision of a range of well-designed and located homes which are well connected to existing retail and commercial centres situated at the heart of our communities and job opportunities. It emphasises that when planning and managing future development planning authorities need to ensure that residents of existing and new communities have access to jobs and an appropriate range of community facilities.
- 5.12 Paragraph 4.19 states that the planning system has a key role to play in reducing the need to travel 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.
- 5.13 Specifically to housing, paragraph 4.2.2 of PPW stipulates that the planning system must:

- ***“identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;***
- ***enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and***
- ***focus on the delivery of the identified housing requirement and the related land supply.”***

5.14 Moreover, paragraph 4.2.13 concerns small sites and states that:

“To assist in broadening the housing delivery options and enable the provision of housing by RSLs, SMEs and the custom and self-build sector, planning authorities should set a locally determined target for the delivery of housing on small sites. To facilitate this, planning authorities should maintain a register of suitable sites which fall below the threshold for allocation in their development plan. Planning authorities should also work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”

5.15 Paragraph 4.2.15 states that planning authorities must ensure that sufficient land is genuinely available or will become available to provide a five-year supply of land for housing judged against the general objectives, scale and location of development required in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints and be economically viable, in order to support the creation of sustainable communities.

5.16 Section 6 – Distinctive and Natural Places requires that development plan strategies, policies and development proposals should be formulated to look to the long term protection and enhancement of the special characteristics and intrinsic qualities of places, be these of natural, historic or built environments, ensuring their longevity in the face of change.

Technical Advice Notes

5.17 PPW is supported by 21 Technical Advice Notes (TAN’s) which provide more detailed guidance on a variety of issues. In respect of this application, the following TAN’s are considered to be of relevance.

Technical Advice Note 1: Joint Housing Land Availability Studies (January 2015)

5.18 At paragraph 2.1, TAN 1 reiterates the requirement for each LPA to maintain a 5-year housing land supply. This states:

“The requirement to maintain a 5-year supply of readily developable housing land in each local planning authority across Wales remains a key planning policy requirement of the Welsh Government. The planning system, through the LDP process, must provide the land that is needed to allow for new home building and local planning authorities are required to ensure that sufficient land is genuinely available to provide a 5-year supply of land for housing.”

Technical Advice Note 12: Design

5.19 TAN 12 (March 2016) provides advice on design considerations and, in relation to housing design, it states that local planning policies and guidance 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;***
- ***secure the most efficient use of land including appropriate densities; and***
- ***consider and balance potential conflicts between these criteria.”***

Technical Advice Note 18: Transport

5.20 TAN 18 offers national guidance on transportation related planning policies and advises that it should be read in conjunction with *Manual for Streets*. It advocates:

- ***“The integration of land use planning and transport in order to promote resource and travel efficient settlement patterns;***
- ***Ensuring that development is located where there is good accessibility by public transport, cycling and walking. This***

***minimises the need to travel and promotes social inclusion;
and***

- ***Managing parking provision.***

Technical Advice Note 24: The Historic Environment

- 5.21 It is acknowledged that historic buildings help give Wales its special character and make it distinctive. The need to preserve the best examples has long been recognised in legislation.
- 5.22 In respect of Archaeological remains, the Note recognises that they are a finite and non-renewable resource. Archaeological remains include evidence buried below the ground and the surviving fabric of historic buildings and other structures. Their significance, as evidence of the past development of our civilisation and as part of Wales' identity, is not necessarily related to their size, visibility or popularity.
- 5.23 Further, paragraph 4.2 states:

"The conservation of archaeological remains is a material consideration in determining a planning application. When considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains. In cases involving less significant archaeological remains, local planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the proposed development."

Development Plan Policy

- 5.24 In terms of planning policy, the statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises the Powys County Council Local Development Plan. The Plan was adopted by the Council in April 2018 and sets out the general location of development, its type and scale as well as protecting what is valued about the area.
- 5.25 As shown on the proposals map extract below, the site lies within the settlement boundary for Four Crosses, as such, is located in an area where development is normally permitted on unallocated white land, therefore is not subject to any specific allocations or constraints. Notwithstanding, a small portion of the site, adjacent to the A483 lies outside of the settlement boundary. However, the settlement boundary does not appear to follow any physical on site boundary,

as such, development of this part of the site to facilitate the proposed development would form a logical extension to the settlement limit of Four Crosses.

Powys County Council LDP Proposals Map Extract



5.26 The following policies, contained within the LDP are considered to be of relevance to this application:

Policy Ref	In relation to
<i>Strategic Policies</i>	
SP1	Housing Growth
SP5	Settlement Hierarchy
SP6	Distribution of Growth across the Settlement Hierarchy
SP7	Safeguarding of Strategic Resources and Assets
<i>Development Management Policies</i>	
DM2	The Natural Environment
DM4	Landscape
DM13	Design and Resources
<i>Housing</i>	
H1	Housing development Proposals
H3	Housing Delivery
H4	Housing Density

5.27 Those policies of direct relevance are summarised below.

SP1 – Housing Growth

5.28 Over the Plan period 2011-2026, the LDP seeks to maintain a 5-year supply of land for housing and provides land for 5,588 dwellings to meet the dwelling requirement of 4,500 additional dwellings.

SP5 – Settlement Hierarchy

5.29 Four Crosses is identified as a Large Village under this policy, which is the second echelon in the settlement hierarchy.

SP6 – Distribution of Growth across the Settlement Hierarchy

5.30 A significant proportion of new development required will be directed to Large Villages. This will be through commitments and new allocations and on suitable sites within the development boundary.

SP7 – Safeguarding of Strategic Resources and Assets

5.31 The policy states that in order to safeguard strategic resources and assets in the County (which include environmental, historic and recreational assets), development proposals must not have an unacceptable adverse impact on the resource or asset and its operation. These include historic environment designations, including:

- i. Registered Historic Landscapes;
- ii. Registered Historic Parks and Gardens;
- iii. Scheduled Ancient Monuments and other archaeological remains;
- iv. Listed Buildings and their curtilages; and
- v. Conservation Areas. and the setting of designations

H3 – Housing Delivery

5.32 The policy requires that housing development proposals must be of an appropriate scale and shall:

- i. Provide a suitable mix of housing types to meet the range of identified local housing needs.
- ii. Be phased if appropriate to reflect the context of the development and mitigate its impact on the local community.

H4 – Housing Density

5.33 The Policy states that:

'All housing development proposals should seek to make the most sustainable and efficient use of land. The density for any proposed housing development should be in accordance with the guide ranges below. Densities may be varied where justified by evidence of local circumstances or constraints.

In terms of Units per hectare the Policy specifies densities of

- a. Towns and Large Villages 27+
- b. Small Villages 20-25
- c. Rural settlements / single dwellings 10-15

5.34 The supporting text of Policy H4 at paragraph 4.6.12 states that the density of development should take into account the character of the area. Further, paragraph 4.6.13 identifies that densities may vary from the guide where justified by other policy considerations and evidence such as an acknowledged physical, biodiversity or infrastructure constraint on a site. Accessible town centre locations may be appropriate for medium rise development or flats resulting in higher density. Conversely in rural locations, a high density may be fundamentally out of character

DM2 – The Natural Environment

5.35 Policy DM2 states that proposals shall demonstrate how they protect, positively manage and enhance biodiversity and geodiversity interests.

DM13 – Design and Resources

5.36 It is stated that development proposals must be able to demonstrate a good quality design and shall have regard to the qualities and amenity of the surrounding area, local infrastructure and resources. The following criteria are included:

- 1. Development has been designed to complement and/or enhance the character of the surrounding area in terms of siting, appearance, integration, scale, height, massing, and design detailing.*
- 2. The development contributes towards the preservation of local distinctiveness and sense of place.*
- 3. Any development within or affecting the setting and/or significant views into and out of a Conservation Area has been designed in accordance with any relevant adopted Conservation Area Character Appraisals and Conservation Area Management Plans, or any other relevant detailed assessment or guidance adopted by the Council.*
- 5. The layout of development creates attractive, safe places, supporting community safety and crime prevention.*

6. It contains an appropriate mix of development that responds to local need, includes a flexibility in design to allow changes in use of subsequent buildings and spaces as requirements and circumstances change.

7. It is inclusive to all, making full provision for people with disabilities.

8. It incorporates adequate amenity land, together with appropriate landscaping and planting.

9. The public rights of way network or other recreation assets listed in Policy SP7 (3) are enhanced and integrated within the layout of the development proposal; or appropriate mitigation measures are put in place where necessary.

10. The development has been designed and located 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. 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.

11. The amenities enjoyed by the occupants or users of nearby or proposed properties shall not be unacceptably affected by levels of noise, dust, air pollution, litter, odour, hours of operation, overlooking or any other planning matter.

12. Adequate utility services exist or will be provided readily and timely without unacceptable adverse effect on the surrounding environment and communities.

13. It demonstrates a sustainable and efficient use of resources by including measures to achieve: i. Energy conservation and efficiency. ii. The supply of electricity and heat from renewable sources. iii. Water conservation and efficiency. iv. Waste reduction. v. The protection, where possible, of soils, especially important carbon sinks such as thick peat deposits.

14. Investigations have been undertaken into the technical feasibility and financial viability of community and/or district heating networks wherever the development proposal's Heat Demand Density exceeds 3MW/km².

Supplementary Planning Guidance (SPG)

5.37 The following SPG documents are considered to be relevant in the consideration of this application:

- Landscape SPG – Approved April 2019
- Biodiversity and Geodiversity – Approved October 2018
- Planning Obligations – October 2018

5.38 The Council, in its role as the Highways Authority, has adopted an SPG on Parking Standards, '*Car Parking Standards, 2017*', which requires parking to be provided at a rate of 1 parking space per bedroom up to a maximum of 3 spaces per dwellings. Visitor parking should be allocated on a rate of one space per five dwellings.

Appraisal

Overview

6.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- The **principle of development** in terms of land use planning policy and sustainable development;
- The acceptability of the proposal in terms of **density**;
- The **impact of the development on the character and appearance** of the building and on the surrounding area;
- The **impact of the development on the historic environment**;
- The **impact of the development on biodiversity**;
- The **impact of the development on the local highway network**; and
- **Other matters**

The principle of development in terms of land use planning policy and sustainable development

6.2 The site is situated within Four Crosses which is designated as a Large Village within the Powys Local Development Plan. Large Villages is the second tier in the settlement hierarchy established in Policy SP5. Policy SP6 (Distribution of Growth across the Settlement Hierarchy) states that housing development will be distributed in accordance with settlement hierarchy based on the settlement's levels of service provision and size. Further, a significant proportion of new housing development will be directed to Large Villages which will be achieved through allocations and on suitable sites within the development boundary. It is therefore considered that developing the site, which is largely within the settlement boundary of a Large Village to deliver residential dwellings is in accordance with Policies SP5 (Settlement Hierarchy) and SP6 (Distribution of Growth across the Settlement Hierarchy) of the adopted LDP.

6.3 Similarly, Policy H1 (Housing Development Proposals) states that housing development proposals will be permitted in Large Villages on sites within development boundaries.

6.4 It is acknowledged that a small portion in the west of the site is situated outside of the settlement boundary of Four Crosses. However, it should be emphasised that the dwellings will be concentrated to the area within the settlement boundary. Whereas the area outside of the settlement boundary will comprise the existing embankment and acoustic barrier to mitigate against the impact of noise created by traffic travelling along the A483. It is

therefore considered that the area outside of the settlement boundary would remain undeveloped from housing. Further, the A483 is situated immediately to the west, as such, the carriageway forms a barrier which would prohibit development beyond the boundary of the site and restrict any future intrusion into the open countryside.

- 6.5 It is therefore considered that the principle of developing the site to accommodate a residential development is firmly established as identified within the pre-app response (ref: 20/0153/PRE).

The acceptability of the proposal in terms of density

- 6.6 As aforementioned, the response received as part of the pre-application enquiry recommended that the development increased the number of units to accord with the housing density guidelines contained within Policy H4 (Housing Density). Therefore any future planning application would need to provide justification for a reduction in density which included reference to the surrounding residential context and on site constraints.
- 6.7 Paragraph 4.6.12 of the LDP states that density should be reflective of character of an area. In this regard, the site's immediate surroundings comprise single dwellings with large curtilage areas and therefore represent a low housing density.
- 6.8 Maes Offa situated to the north comprises one dwelling with an associated curtilage area of 0.14 hectare which represents a density of 7.2 dwellings per hectare. Similarly, Bryn Offa to the south also features just one dwelling with a curtilage area of 0.15 hectares which constitutes a density of 6.7 dwellings per hectare. Whereas the proposed development comprises up to four dwellings on a site measuring 0.28 hectares which represents a density of 14.3 dwellings per hectare. Therefore, represents a higher density than the immediate surroundings despite comprising a reduction from the recommended density contained in Policy H4 (Housing Density). It should be emphasised that this density does not account for on site constraints which may justify a reduction in density in accordance with paragraph 4.6.13 of the LDP and will be discussed in further detail below.
- 6.9 The dwellings in their current arrangement ensure that frontage can be provided onto both the A483 and the U4908 and will be in keeping with the existing street scene of detached properties with large amenity areas created by Maes Offa and Bryn Offa. Whereas an increase in unit numbers may result in some of the units becoming semi detached which would conflict with the surrounding residential context and appear disjointed from the established streetscape.

- 6.10 From a highways safety perspective, the design has avoided providing parking areas/driveways directly onto the U4908. Instead all vehicular traffic associated with the site will access the highway via one access point which achieves sufficient visibility splays and enables residents to access and egress the site in a forward gear. Notwithstanding, this requires the access to extend into the site and for all parking to be achieved centrally which further sterilises the area available for housing.
- 6.11 An increase in dwellings numbers on the site could also take the development over the 5 dwellings off a private drive threshold which would mean that the access road would need to be designed to adoptable standards, thereby increasing road width, increasing access radii and increasing costs whilst the development will inevitably feel 'harder' and more road dominated and this would further exacerbate the difference in character between the development and immediately adjoining existing development.
- 6.12 The development has been informed by advice given by local agents who suggest that the site will generate most value through development as self-build plots. However, increasing density on the site and the requirement for adopted highways infrastructure is likely to make the site less suitable for self-builders who will prefer more spacious plots and may be put off by the added costs associated with the adopted highways which would need to be put in by a single contractor.
- 6.13 It should also be emphasised that a portion of land in the west of the site comprises an existing embankment and where the acoustic boundary is to be positioned. As such, this portion of the site is not suitable for housing to be located but is included within the site boundary.
- 6.14 In light of above the net developable area available for housing which excludes the carriageway and embankment to the rear measures approximately 0.21 hectares in extent. This represents a housing density of approximately 19 dwellings per hectare and is considered to be acceptable given the surrounding residential context which is subject to a lower housing density in accordance with paragraph 4.6.12 of the adopted LDP.

The impact of the development on the character and appearance of the surrounding area

- 6.15 Whilst the application is being made in outline with all matters reserved apart from access, it is considered that the indicative layout illustrates that an attractive scheme which is sympathetic to the character and appearance of the surrounding area is delivered. The

site is located within the settlement boundary lying adjacent to existing residential dwellings at Maes Offa and Bryn Offa. The site is therefore well-related to the existing settlement.

- 6.16 The proposed layout plan demonstrates that the potential density of the site and its form, scale, massing and urban grain are acceptable in reflecting the character of this part of the settlement. As identified at paragraph 7.9, the development through providing frontage onto both the A483 and U4908 will maintain the street scene created by Maes Offa and Bryn Offa.
- 6.17 Furthermore, the retention of the hedgerows and trees along the boundaries will serve to ensure that the impact on the surrounding local context is minimised as much as possible.
- 6.18 On this basis, it is considered that the proposed development fully complies with both national and local policies in that it promotes high quality, healthy, sustainable and locally distinct places and it will not have an unacceptably detrimental impact upon the character and appearance of the surrounding landscape area nor on the adjacent areas of existing residential development.

Impact of the Development on the Historic Environment

- 6.19 As aforementioned, the proposed development lies within close proximity to a number of historical assets including Offa's Dyke which is designated as a Scheduled Ancient Monument (CADW Ref: MG033) and recorded Bronze Age burial mounds. Given the site's proximity to these features, it is acknowledged that the site possesses archaeological potential. Consultation with Clwyd Powys Archaeological Trust has already taken place and it was confirmed that trench evaluation was required to determine the extent and characteristic of archaeological potential in a given area before extensive excavation work is undertaken.
- 6.20 Headland Archaeology has therefore prepared a Trial Trench Evaluation report which accompanies the submission to determine the presence or absence of archaeological deposits within the site. The report identifies that no archaeological features were revealed during the evaluation of seven trenches. The lack of archaeological features may be indicative of a lack of historical activity across the site or the disturbance caused by the Maesoffa farm buildings and modern use during the construction of the A483 bypass.
- 6.21 Further consultation with Mark Walters of Clwyd Powys Archaeological Trust has confirmed that there are no archaeological issues arising from the report and the Trust would have no additional requirements.

6.22 The proposals will therefore not result in adverse impact on archaeological assets in accordance with Policy SP7 (Safeguarding of Strategic Resources and Assets) of the adopted LPD and TAN 23: The Historic Environment.

Impact of the Development on Biodiversity

6.23 Given that the site is greenfield in nature and features a number of hedgerows, it is acknowledged that the site possesses the potential to be occupied by on site biodiversity. Accordingly, the application is accompanied by a Preliminary Ecological Assessment and reptile Survey which identified that the site is of low ecological value.

6.24 In respect of reptiles, the site has been confirmed as being used by individual/low numbers of grass snake. Given the low numbers of grass snake observed and lack of suitable hibernation/breeding features on the site it is recommended that implementation of Reasonable Avoidance Measures would be sufficient to prevent the risk of harm to these species and to avoid the risk of potential to cause death or injury of individual reptiles.

6.25 The Report identifies that there is no need for additional surveys to inform an application for the development of the site subject to retention of features of biodiversity value and implementation of appropriate reasonable avoidance measures regarding reptiles and nesting birds. Whilst the layout which accompanies the application is indicative, it illustrates that the scheme can be delivered whilst retaining a large portion of on site features including hedgerows.

6.26 Furthermore, the report identifies ways in which biodiversity enhancement can take place on site in accordance with Section 6 of the Environment (Wales) Act 2016. Opportunities for enhancement include the installation of bat and/or bird boxes and native species/beneficial landscaping.

6.27 The proposed development can therefore protect and manage biodiversity interest in accordance with Policy DM2 (The Natural Environment) of the adopted LDP and Biodiversity and Geodiversity SPG.

Impact of the development on the local highway network

6.28 Given that the proposal relates to the development of just 4no. dwellings, it is considered that the vehicle trips associated with the scheme can be easily accommodated within the local highway network.

- 6.29 In order to ensure highway safety, the traffic calming measures to the front of the site could present a conflict with the proposed site access. Consequently, and as shown on the accompanying traffic calming measures plan, an alternative arrangement is proposed which comprises the removal of the existing chicanes and the establishment of Marshalls Speed Cushions to the south of the proposed access.
- 6.30 In respect of comments received from the highways officer as part of the pre-application enquiry which emphasised that consideration should be given to relocating the proposed access to avoid creating a crossroads with the access for the consented residential scheme (ref: 18/0581/OUT) on the east of the U4908. It was determined during the pre-application meeting and as discussed at paragraph 2.10, that access details were removed from the consideration of the application and reserved for future determination. As such, there is no guarantee that the access arrangement proposed for application ref: 18/0581/OUT would be designed in such a manner. Similarly, the application was granted subject to S106 in December 2019, which does not appear to have been signed and no formal decision notice issued, with no reserved matters application coming forward. As such, there is no guarantee that the scheme would be delivered. It is therefore unjustifiable for the proposed development, which includes access details, to amend its design based on a speculative scheme that may never be realised.
- 6.31 It is therefore considered that the potential conflict has been alleviated and highway safety will not be detrimentally impacted on in accordance with criterion 10 of Policy DM13 (Design and Resources) of the adopted LDP.

Other Matters

Car Parking

- 6.32 As aforementioned, whilst the layout is indicative at this stage it is considered that the proposed development will accord with Powys County Council's adopted parking standards, i.e. 1 space per bedroom up to a maximum of 3 spaces per dwelling.

Conclusion

- 7.1 Asbri Planning Ltd is acting on behalf of Powys County Council (Housing Services) in respect of outline planning application for residential development at land adjacent to Maes Offa, Four Crosses.
- 7.2 This Planning Statement demonstrates that the principle of development on the site is firmly established as the site comprises land within the settlement boundary of Four Crosses.
- 7.3 The development comprises a reduction in density from the guidelines identified in Policy H4 (Housing Density) of the adopted LDP. However, it should be emphasised that the site's surrounding residential context features a low density. As such, the proposed density is reflective of the character of the area in accordance with paragraph 4.6.12 and acknowledges on site constraints in accordance with paragraph 4.6.13 of the adopted LDP.
- 7.4 This statement has demonstrated that the proposal is acceptable in the context of the historic environment, biodiversity and highway safety in accordance with planning policy at both national and local levels including Policies SP7 (Safeguarding of Strategic Resources and Assets), DM2 (The Natural Environment) DM13 (Design and Resources) of the adopted LDP.
- 7.5 It is therefore respectfully requested that Powys County Council grant planning permission for the outline application for residential development with all matters reserved apart from access at land adjacent to Maes Offa, Four Crosses.