

Planning, Design, Access, Drainage and Green Infrastructure Statement**Proposed Residential Redevelopment at Victoria House, Rhymney, NP22 5NU****1. Introduction****1 Introduction****1.1 Purpose of the statement**

This statement is submitted on behalf of GHR Developments in support of a full planning application for the redevelopment of Victoria House, Rhymney.

The statement explains the design process and assesses the scheme against national and local planning policy. It should be read with the application drawings and any technical reports submitted separately.

1.2 Applicant and delivery model

GHR Developments is the applicant and development client. All 28 dwellings are intended to be transferred to or managed by an RSL as social-rented affordable housing. The final RSL, nominations arrangements, definition of social rent, occupancy criteria and long-term affordability can be secured by a section 106 agreement or other mechanism agreed with Caerphilly County Borough Council.

The RSL model is integral to the planning case. It provides a regulated landlord with responsibility for tenant services, repairs, safety compliance, communal areas, landscaping, refuse and cycle facilities, parking management and planned investment over the life of the building.

1.3 Proposed development

The proposed description of development is:

“Demolition of the existing Victoria House building and redevelopment to provide 28 one-bedroom social-rented apartments (Use Class C3), with vehicular and pedestrian access, 14 car-parking spaces, 32 cycle spaces, refuse storage, landscaping, sustainable drainage, roof-mounted photovoltaic panels and associated works.”

2 Site and context

2.1 Location

Victoria House occupies approximately 0.15 hectares on the north side of Victoria Road, immediately behind the eastern side of High Street in Rhymney. The submitted title and site plans identify the address as Victoria House, Victoria Road, Rhymney, Tredegar NP22 5NU. The site sits within the defined settlement boundary and forms part of an established mixed residential and commercial neighbourhood.



Figure 1 Proposed site location

2.2 Existing site and use

The site contains a predominantly single-storey building and extensive areas of hardstanding. It has previously accommodated a health centre and later a mix of café, training and temporary HMO accommodation uses. It comprises an irregular low-rise building of limited townscape quality, surrounded by parking and service space. Its form and boundary treatment do not make efficient use of this central brownfield site.

The HMO permissions allow temporary accommodation within parts of the building. The latest permission increased the authorised HMO capacity to up to 13 rooms.

2.3 Surrounding character

High Street lies immediately west and contains traditional two- and three-storey buildings with a fine-grain plot pattern. A petrol filling station and associated commercial premises adjoin the site to the south; residential and commercial buildings lie to the north and west; and open rising land, recreation uses and War Memorial Park lie to the east. The local conservation area boundary runs close to the rear of High Street.

The context is therefore transitional: the compact centre and traditional frontage to the west give way to larger plots, commercial activity and open land toward the east.

2.4 Accessibility

The site is within a short walk of High Street shops and services, bus stops and Rhymney railway station. Daily needs can be met without a private car and the railway provides connections along the Rhymney Valley line. The 2020 and 2021 HMO decisions also treated the location as accessible to services and public transport. This established accessibility supports a one-bedroom social-rented scheme with a restrained parking ratio and strong cycle provision.

2.5 Constraints and opportunities

Topic	Baseline	Design response
Settlement	Inside the adopted settlement boundary	Supports the principle of housing and efficient brownfield reuse.
Existing fabric	Low-rise building and extensive hardstanding	Opportunity for comprehensive regeneration and improved urban form.
Heritage	Conservation area boundary close to High Street; no on-site designation identified	Design should preserve the area's character and improve the backland setting.
Flooding	No mapped flood-zone identified	Manage surface water through SuDS.
Ground	Coal-mining reporting area and previously developed land	Ground, contamination and infiltration testing should inform foundations and drainage as part of detailed design.
Ecology	Predominantly developed site; demolition of an older building	Avoid habitat loss, survey building-related species as necessary and secure measurable enhancements.
Neighbours	Mixed residential/commercial interfaces and filling station to the south	Use separation, orientation, landscape, acoustic/ventilation measures and construction controls.
Movement	Central location but constrained urban plot	Prioritise walking, cycling and managed parking while retaining safe service access.

3 Planning history

3.1 Site-specific decisions

A review of the planning register identifies the following material history. The decisions demonstrate an established pattern of lawful community/residential-related uses and, importantly, a previous acceptance of complete residential redevelopment.

Reference	Development	Decision	Material relevance
14/0268/CLEU	Lawful development certificate for the existing D1 health-centre use.	Granted 23 Jun 2014	Confirms the former lawful institutional use.
15/1241/FULL	Redevelopment with 8 dwellings: 3 three-bedroom and 5 two-bedroom units, with parking.	Granted 12 Jul 2016	Establishes the acceptability of demolition and residential redevelopment; officer assessment accepted location, layout, scale, amenity and access subject to conditions and an affordable-housing obligation.
18/0904/COU	Change of part of the building to an A3 café/takeaway.	Granted 7 Jan 2019	Part of the mixed-use evolution of Victoria House.
20/0080/COU	Change of part of the building to HMO temporary accommodation, comprising 7 bedrooms.	Granted 7 Apr 2020	Introduced the temporary HMO accommodation use.
21/0564/COU	Further HMO temporary accommodation in Unit 2, adding 6 bed-sits and taking total capacity to up to 13 rooms.	Granted 7 Sep 2021	Defines the present authorised HMO baseline and associated management, parking, cycle and refuse requirements.

Sources: Caerphilly County Borough Council planning register, decision notices and officer reports, checked 7 August 2026. The 2016 permission does not appear to have been implemented in the material reviewed; its decision nevertheless remains material evidence of the accepted housing principle.

3.2 What the history establishes

The 2016 full permission is the clearest comparator. It found the site suitable for housing, accepted redevelopment within the settlement, and concluded that design, amenity, highways and conservation-area setting could be satisfactorily addressed.

The 2020 and 2021 permissions establish that part of Victoria House may operate as temporary HMO accommodation. Their officer reports recognised the site's accessibility but also dealt with practical management matters including parking, cycle storage, refuse and the interaction of uses. The 2021 committee report records significant community concern about an expansion of temporary HMO accommodation. Those representations do not justify adverse assumptions about residents, but they underline the importance of a transparent, accountable management structure.

3.3 Planning benefit of replacing the HMO model

The loss of the HMO should be treated as a positive part of the planning balance because it is accompanied by a substantial improvement in both quantity and quality of accommodation. The comparison is between up to 13 authorised HMO rooms and 28 permanent self-contained dwellings, not between housing and a non-residential use.

Matter	Authorised HMO baseline	Proposed RSL social-rented model
Accommodation	Temporary HMO rooms/bed-sits with shared or communal elements	28 self-contained one-bedroom apartments, each with its own kitchen, bathroom and living space
Tenure	Temporary/shared accommodation model	Social-rented occupation under the agreed RSL and nomination framework
Management	Management conditions attached to individual HMO permissions	Single RSL accountable for the whole building and estate
Maintenance	Existing arrangements tied to the current mixed-use building	Planned maintenance, repairs, safety compliance and lifecycle investment through the RSL
Common areas	Legacy building and hardstanding	Purpose-designed lift/stair core, refuse room, cycles, landscape and managed parking
Neighbour interface	Mixed uses and incremental conversions	One coherent residential use with a single point of contact and enforceable management plan

SUMMARY

Replacing the HMO does not displace the site's housing role: it provides 28 self-contained homes in place of up to 13 temporary-accommodation rooms, supplies a priority affordable tenure and secures stronger long-term management and maintenance arrangements. This is a substantial social and placemaking benefit.

4 The proposed development

4.1 Development schedule

Element	Proposal
Land use	28 self-contained social-rented apartments (Use Class C3), managed by an RSL
Dwelling mix	28 one-bedroom homes: 15 Type A, 7 Type B and 6 Type C
Unit areas	Type A 50.5 m ² ; Type B 50.5 m ² ; Type C 52.0 m ²
Floor distribution	Ground floor 6 homes; first floor 11 homes; second floor 11 homes
Building	Three storeys, articulated flat/parapet roof form, central lift and stair core
Parking	14 car spaces, equivalent to 0.5 space per dwelling
Cycles	32 resident cycle spaces
Refuse	Dedicated ground-floor refuse room, annotated for a two-bin-and-caddy set per dwelling
Landscape	New trees and planted perimeter/amenity areas with improved frontage and pedestrian entrance
Energy	Roof-mounted photovoltaic arrays shown on the proposed roof plan



Figure 2 Proposed site plan and ground-floor arrangement / C2J Architects, 27 July 2026

4.2 Spatial arrangement

The building occupies the central and southern part of the plot, with the principal pedestrian entrance and communal core addressing the western access lane. Parking is concentrated at the northern end, allowing the residential elevations and landscaped edges to define the remainder of the site. Cycle storage is immediately accessible from the parking court and entrance; refuse storage is internal and purpose-designed at ground level.

Six homes are provided at ground floor and 11 on each upper floor. A central lift and stair core serves all levels. The long elevations are broken into projecting light-brick bays and darker recessed links, avoiding a single institutional frontage and giving individual homes a legible address within the composition.



Figure 3 Proposed ground- and first-floor plans / C2J Architects, 27 July 2026

4.3 Materials and architectural language

The elevations use a restrained contemporary palette: light buff facing brick for the principal projecting elements; dark grey standing-seam or metal cladding to recessed links and upper sections; dark window and door frames; and simple metal balconies. The contrast gives depth and rhythm while reflecting the robust masonry character of the valley settlement. Parapets and flat roof forms keep the silhouette controlled and accommodate photovoltaic panels without a visually dominant pitched roof.



Figure 4 Proposed elevations / C2J Architects, 27 July 2026

5 Planning policy context

5.1 Decision-making framework

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan comprises Future Wales: The National Plan 2040 and the adopted Caerphilly County Borough Local Development Plan up to 2021. Although the adopted LDP period has ended, it remains the statutory local plan until replaced; the age of individual policies affects the weight to be given where national policy or current evidence has moved on.

The Caerphilly 2nd Replacement LDP is at Pre-Deposit/Revised Preferred Strategy stage. Consultation took place in January and February 2025 and, at 7 August 2026, the Council advises that the Deposit consultation will occur later in 2026. Its strategy can therefore attract limited weight, proportionate to its stage and the absence of an examined Deposit plan.

5.2 National policy

Policy/guidance	Requirement	Scheme response
Future Wales Policy 2	Strategic placemaking should shape urban growth and regeneration.	Comprehensive brownfield regeneration in an accessible local centre.
Future Wales Policy 7	Supports delivery of affordable homes in response to identified need.	All 28 dwellings are social-rented affordable homes.
Future Wales Policy 9	Requires resilient ecological networks and green infrastructure.	Landscape, SuDS and biodiversity measures are integrated through the step-wise approach.
PPW 12 — placemaking	Promotes compact, mixed, accessible places and effective use of previously developed land.	Housing is concentrated within a settlement, close to services and public transport.
PPW 12 — housing	Planning should support a range of good-quality homes, including affordable housing informed by evidence.	The scheme directly addresses current social-rented need.
PPW 12 — biodiversity/GI	A proportionate GI statement must demonstrate the step-wise approach and net benefit for biodiversity.	Section 9 records avoidance, minimisation, mitigation and enhancement.
TAN 2	Provides guidance on affordable-housing delivery and planning mechanisms.	Tenure, nominations and affordability can be secured through an agreed obligation.
TAN 12	Sets design objectives of access, character, movement, community safety and environmental sustainability.	The design and access statement applies those objectives.
TAN 15 (2025)	Uses the Flood Map for Planning and risk-based approach to flooding and coastal erosion.	Desk-based review finds no mapped site intersection; SuDS and exceedance principles are set out in Section 8.

Policy/guidance	Requirement	Scheme response
WDQR 2021	Mandatory quality requirements for affordable housing schemes receiving relevant Welsh Government support.	The layout includes minimum unit areas, lift access and turning spaces; final compliance is to be coordinated with the RSL/funder.

5.3 Adopted Caerphilly LDP

Policy	Subject	Response
SP1	Development Strategy — Heads of the Valleys Regeneration Area	Regenerates a brownfield site in Rhymney and delivers needed housing.
SP4	Settlement Strategy	Directs appropriate development to defined settlements.
SP5	Settlement Boundaries	The site lies within the settlement boundary.
SP6	Place Making	Requires high-quality, sustainable, locally responsive design.
SP10	Conservation of Natural Heritage	Avoids designated habitat and integrates GI/net-benefit measures.
SP15	Affordable Housing Target	All 28 units contribute directly to affordable-housing supply.
SP21	Parking Standards	14 managed car spaces are balanced with 32 cycle spaces and accessible location.
CW1	Sustainable Transport, Accessibility and Social Inclusion	Walkable access to local services and public transport; inclusive internal circulation.
CW2	Amenity	Layout, separation, orientation and technical mitigation protect residents and neighbours.
CW3	Design Considerations — Highways	Uses the established access and provides a defined parking/service court.
CW4	Natural Heritage Protection	Ecological survey and step-wise mitigation can secure protection and enhancement.
CW5	Protection of the Water Environment	Separate foul drainage and SuDS-led surface-water strategy.
CW6	Trees, Woodland and Hedgerow Protection	Retain feasible boundary vegetation and add a new managed tree/planting structure.
CW10	Leisure and Open Space Provision	On-site landscaped amenity and proximity to War Memorial Park; any proportionate obligation to be agreed.
CW11	Affordable Housing Planning Obligation	A 100% social-rented scheme exceeds the earlier site obligation and should be secured appropriately.
CW15	General Locational Constraints	Redevelopment is compatible with adjacent uses subject to normal detailed controls.

5.4 Supplementary and emerging policy

Relevant adopted supplementary planning guidance includes LDP1 Affordable Housing Obligations (updated 2020), LDP5 Car Parking Standards (2017) and LDP6 Building Better Places to Live (2017). These documents inform the tenure mechanism, parking judgement and detailed residential design.

The emerging 2nd Replacement LDP identifies Rhymney as a Local Centre and promotes a distribution of growth linked to existing centres, public transport, climate resilience, placemaking and green/blue infrastructure. Those broad directions are consistent with the proposal, although limited weight should be applied until the Deposit plan has been published, consulted upon and examined.

6 Design and access statement

6.1 Design objectives

- replace an inefficient and visually weak brownfield use with a coherent residential place;
- deliver 28 good-quality, self-contained and affordable one-bedroom homes;
- create a scale and rhythm that mediate between High Street buildings and the more open eastern edge;
- provide a safe, legible and inclusive entrance with lift access to every floor;
- limit car dependence through strong cycle provision and the site's public-transport accessibility;
- integrate landscape, SuDS, biodiversity and renewable-energy measures from the outset; and
- enable straightforward, durable management by a single RSL.

6.2 Use and amount

Residential use is appropriate in this location and has previously been approved. The amount reflects an efficient apartment typology on a central 0.15-hectare site. The building is only three storeys; parking is contained at the northern end; and open, planted edges are retained around the principal residential elevations.

All homes are social-rented. Types A and B provide approximately 50.5 m² and Type C approximately 52.0 m². The consistent one-bedroom mix meets a clearly evidenced affordable-housing need and supports efficient management, while three plan variants avoid a wholly repetitive internal arrangement.

6.3 Layout

The layout establishes a clear sequence from the western access lane to a defined entrance, central lobby and lift/stair core. Ground-floor dwellings occupy the southern and eastern portions, separated from the parking court by the core, refuse and cycle accommodation. Upper floors use a simple central corridor with short, legible routes to the lift and stair.

Parking is grouped at the northern end where vehicle movements have least effect on the main residential frontage and landscaped southern area. Cycle parking is visible and convenient. The refuse room is internal but directly accessible for residents and collection management. This arrangement reduces visual clutter, supports passive supervision and gives the RSL a clear operational zoning of the site.

6.4 Scale and massing

The three-storey scale is appropriate for an apartment scheme near Rhymney centre and responds to two- and three-storey buildings around High Street. The elevations and sections show a controlled parapet line and a composition broken into narrower vertical elements. Projecting brick bays alternate with darker recessed links, reducing apparent length and giving the building a rhythm comparable with the finer grain of nearby plots.

The front/west elevation steps with the site levels. The southern end is set back behind new planting, while the northern parking court prevents the building from presenting a continuous wall to neighbouring plots. The sections demonstrate that the relationship with surrounding buildings and the rising land has been considered rather than applying a uniform platform or excessive roof form.

6.5 Appearance

The light facing brick provides permanence, texture and a civic residential quality. Dark metal cladding is used selectively to recess links and upper elements, not as a dominant finish. Regular window openings, individual balconies and expressed entrances animate the long elevations and support natural surveillance. The overall language is contemporary but restrained, avoiding pastiche and relying on durable materials suitable for RSL maintenance.

6.6 Landscape and external amenity

The proposal replaces substantial hardstanding with landscaped perimeter and amenity areas. New trees are shown along the eastern, southern and western edges, softening views and creating a transition to the open land east of the site. Hard landscape marks the main entrance and provides usable communal space. Selected upper-floor homes have balconies, while all homes benefit from outlook and access to nearby public open space, including War Memorial Park.

The final landscape specification will prioritise locally appropriate, climate-resilient native and pollinator-friendly species; provide adequate soil volumes; avoid conflicts with utilities and sight lines; and integrate rain gardens or bioretention where supported by the SAB design. The RSL management plan should set clear establishment, replacement and maintenance responsibilities.

6.7 Movement and access

Vehicular access, parking and servicing

The scheme uses the established access from Victoria Road via the lane on the western side of the site. Fourteen clearly defined parking spaces are positioned at the northern end. A ratio of 0.5 space per dwelling is appropriate in principle for one-bedroom social-rented accommodation in an accessible local centre, when combined with 32 cycle spaces and RSL-controlled allocation. The final parking-management plan should prioritise mobility needs, keep servicing and emergency access clear, and identify accessible and electric-vehicle provision in accordance with the applicable standards.

Refuse collection can be managed from the access/parking court, with bins transferred from the dedicated room on collection days under the estate-management arrangements. Detailed tracking, fire access and collection protocol should be coordinated with the highway, waste and fire authorities where required.

Walking, cycling and public transport

A direct pedestrian route leads from the western lane to the principal entrance. High Street services, bus stops and Rhymney station are within convenient walking distance. Thirty-two cycle spaces exceed one space per dwelling and make cycling a realistic option rather than a residual provision. The RSL can support uptake through secure access, clear user information and maintenance of the store.

Inclusive access

The plans show a central lift to all residential floors, a protected stair, level internal routes and 1,500 mm turning circles within key circulation and dwelling areas. These are positive inclusive-design features. Detailed thresholds, gradients, door clear widths, controls, sanitary layouts, visual contrast, wayfinding and accessible parking will be developed to satisfy Building Regulations and the applicable WDQR 2021 requirements in coordination with the selected RSL.

6.8 Community safety and management

The entrance is prominent and overlooked, the parking/cycle areas are capable of passive supervision, and the single residential use avoids unmanaged interfaces between unrelated activities. Lighting should be low-energy and designed to provide safe routes without glare or unnecessary ecological spill. Access control, CCTV if justified, fire safety, deliveries and out-of-hours contact will sit within one RSL estate-management plan.

7 Planning assessment

7.1 Principle of development

The proposal accords with SP1, SP4 and SP5 because it redevelops previously developed land within the Rhymney settlement boundary. It is close to services and public transport, and residential redevelopment has already been accepted through permission 15/1241/FULL. There is no policy need to retain the present low-density building or the HMO form of accommodation where a larger supply of better-quality affordable homes is proposed.

The compact apartment typology uses land efficiently and helps support the vitality of local services. It avoids greenfield expansion and concentrates growth in a location consistent with both the adopted settlement strategy and the broad direction of the emerging replacement plan.

7.2 Affordable-housing need and delivery

Caerphilly's Local Housing Market Assessment 2024 identifies a net annual affordable-housing requirement of 218 homes after planned supply and turnover, comprising 160 social-rented and 58 intermediate homes. The proposal would deliver 28 social-rented homes—17.5% of one year's identified borough-wide social-rent requirement—on a single, previously developed site.

Earlier Upper Rhymney Valley well-being evidence records particular demand for one-bedroom general-needs social housing. The all-one-bedroom mix therefore has a reasonable needs basis, subject to final confirmation through the Council's current housing-register and RSL nomination evidence. The scheme's value lies not only in its 100% affordable tenure but in delivering self-contained homes that can be managed and maintained over the long term.

AFFORDABLE-HOUSING MECHANISM

The planning obligation should secure all 28 homes as social rent, identify the eligible household and nomination framework, maintain affordability in perpetuity, define the timing of RSL transfer/management, and include a mortgagee-in-possession provision in the form agreed with the Council.

7.3 HMO loss, housing quality and stewardship

Planning policy does not require the retention of a particular HMO where the site can provide more self-contained affordable homes and no evidenced specialist need requires that exact building to remain. The proposal raises authorised residential capacity from up to 13 HMO rooms to 28 dwellings and provides every household with independent living, cooking and bathroom facilities.

The RSL model is a material benefit because the whole site will be held within one regulated management system. Repairs, communal systems, fire and building safety, landscape, drainage assets, refuse, cycle parking, car allocation and neighbour liaison can be planned and funded as part of a long-term asset-management programme. That arrangement directly addresses the practical management and maintenance issues that can arise from incremental conversion and temporary shared accommodation.

7.4 Design, placemaking and heritage

The scheme satisfies SP6 and CW2 by replacing a visually weak, under-used site with a legible residential building and planted setting. The mass is articulated into smaller components, materials are robust, entrances and windows activate the elevations, and parking is placed away from the principal amenity edge. The contemporary design is appropriate to the mixed backland context and does not compete with the traditional High Street frontage.

The conservation area boundary is nearby but does not cross the site. The redevelopment would preserve its character and appearance and improve the setting by removing an undistinguished low-rise building and extensive hardstanding. The 2016 decision provides additional site-specific evidence that residential redevelopment can be achieved without unacceptable heritage effects.

7.5 Transport and parking

The development is accessible by walking, cycling and public transport and provides more cycle spaces than dwellings. Fourteen car spaces represent a deliberate, sustainable ratio for one-bedroom social rent in a local-centre location. The ratio should be considered with RSL allocation and monitoring rather than against an assumption of unrestricted private-market car ownership. Conditions can secure the cycle store, parking layout, construction traffic management, EV charging and a parking-management plan if these are not fixed by the approved drawings.

7.6 Living conditions

The homes have regular external windows and practical open-plan living/kitchen arrangements, separate bedrooms and bathrooms, and areas of approximately 50.5–52.0 m². A lift serves all floors and turning circles are shown. Landscape, controlled access, internal refuse storage and purpose-designed common circulation give residents a marked qualitative improvement over the existing converted building.

Detailed acoustic and ventilation design should respond to Victoria Road and the filling-station/commercial interface. This can include façade-specific glazing, acoustically attenuated ventilation and careful location of opening windows or amenity areas, informed by a proportionate assessment. The objective is to achieve satisfactory internal and external conditions without relying on windows remaining permanently closed.

7.7 Neighbour amenity and environmental interface

The site is separated from High Street properties by the rear lane/plots and from open land to the east by the landscaped boundary. The three-storey building is articulated and positioned to avoid an overbearing continuous edge. The proposed elevations and sections demonstrate a considered relationship to surrounding levels. Subject to final window review and normal lighting, noise, construction and boundary controls, the scheme would not cause unacceptable loss of privacy, daylight or outlook.

7.8 Ground conditions, ecology and trees

The site is in a coal-mining reporting area and has a history of development and mixed uses. A proportionate ground investigation should establish foundation conditions, contamination risk, ground-gas requirements and the suitability of infiltration drainage. Any remediation or mine-related measures can then be incorporated into the detailed design and verified before occupation.

The site is predominantly building and hardstanding and no designated ecological site is identified within the title boundary. Nevertheless, demolition may affect building-associated protected species. The 2015 permission required bat-related investigation, so an up-to-date preliminary ecological appraisal and any necessary bat survey should inform the demolition method. The proposal's landscape, SuDS and integrated bird/bat features can then secure a net benefit, as set out in Section 9.

7.9 Open space

Policy CW10 is engaged by a scheme of more than ten dwellings. The proposal provides landscaped communal space and selected balconies within a constrained central site, and residents will have convenient access to War Memorial Park and nearby recreation land. The precise approach to any off-site contribution should be agreed with the Council having regard to identified need, the 100% affordable tenure, viability/funding framework and the quality of on-site provision.

7.10 Climate and resource efficiency

The scheme reuses previously developed land, supports low-car living, provides 32 cycle spaces and includes roof-mounted photovoltaic panels. A compact three-storey form reduces exposed envelope relative to dispersed housing. Detailed design should use a fabric-first energy strategy, efficient all-electric systems where feasible, water-efficient fittings, low-energy lighting and durable materials. Landscape and SuDS should be designed for more intense rainfall and warmer summers.

8 Drainage statement

8.1 Purpose and status

This section sets the strategic drainage principles for planning. It is not the statutory SuDS Approving Body (SAB) application and does not contain infiltration tests, drainage-area calculations, discharge-rate modelling or construction details. Those elements will be prepared by the drainage engineer and approved by the SAB before construction begins.

8.2 Baseline and flood-risk screening

The existing site is substantially occupied by building and hardstanding and therefore produces rapid runoff with limited water-quality treatment or biodiversity value. The desk-based Landstack constraints review does not identify the title as intersecting mapped river, tidal or surface-water flood zones. The final drainage submission should nevertheless confirm the current Natural Resources Wales Flood Map for Planning, local drainage records and topographic exceedance routes under TAN 15 (2025).

Previously developed ground and the coal-mining reporting designation mean infiltration cannot be assumed. Percolation testing, ground investigation and contamination assessment must determine whether infiltration is safe, stable and effective. The landscape proposals create an opportunity to reduce effective impermeable area and provide above-ground source control compared with the existing condition.

8.3 Statutory SuDS requirement

Schedule 3 to the Flood and Water Management Act 2010 is implemented in Wales. Developments of more than one dwelling or with a construction area of 100 m² or more require SAB approval and must comply with the Welsh Ministers' statutory SuDS standards. This proposal clearly exceeds both thresholds. SAB approval is separate from planning permission and must be obtained before construction with drainage implications begins.

The standards prioritise runoff destination, hydraulic control, water quality, amenity, biodiversity, construction and maintainability. The drainage design should therefore start with multi-functional surface features and use below-ground storage only to the extent that site constraints require.

8.4 Surface-water strategy

Stage	Proposed principle	Outcome
1 Reduce and reuse	Minimise impermeable cover; use water-efficient landscape and consider rainwater harvesting for irrigation or communal uses where practicable.	Reduces runoff volume and potable-water demand.
2 Source control	Permeable paving where ground conditions permit; rain gardens, tree pits and bioretention integrated with landscaped edges; trapped gullies only where necessary.	Controls frequent rainfall, filters pollutants and adds amenity/biodiversity.
3 Infiltration	Use only if percolation, contamination and mine/ground-stability evidence demonstrates suitability and adequate separation.	Avoids creating pollution or geotechnical pathways.

Stage	Proposed principle	Outcome
4 Controlled discharge	If infiltration is not feasible, attenuate and discharge to an available surface-water system or watercourse at an agreed restricted rate; sewer discharge is the final option and requires consent.	Limits downstream peak flows and follows the statutory hierarchy.
5 Exceedance	Route flows above design capacity along roads/landscape away from entrances, dwellings, neighbouring property and the highway; set thresholds and finished levels accordingly.	Keeps the site safe during events beyond the design standard.

The detailed system should manage the full range of events required by the current statutory standards, include climate-change allowances, prevent flooding of buildings, demonstrate no increase in off-site flood risk and provide a treatment train appropriate to parking and roof runoff. Finished floor levels and the external grading should be coordinated with the architectural sections before the layout is fixed for construction.

8.5 Foul drainage

Foul and surface-water systems should be separate. Foul flows are intended to connect to the public foul sewer, subject to confirmation of the connection point, capacity and consent from Dŵr Cymru Welsh Water. Surface water must not be connected to the foul sewer. Any pumping, easements or off-site works identified by the utility provider should be incorporated before commencement.

8.6 Water quality, construction and maintenance

Parking runoff should receive suitable treatment before discharge. Construction controls should prevent silt, concrete washout, fuels or contaminated water entering drains or watercourses. A Construction Environmental Management Plan can secure phased drainage, protected stockpiles, spill response and inspection during demolition and earthworks.

Long-term responsibility must be explicit. Adoptable elements should be offered to the relevant body where the statutory criteria are met; private or shared elements should be included in the RSL asset register. The maintenance plan should identify inspection frequency, sediment and vegetation management, permeable-paving care, replacement responsibilities, access and funding. Residents should not be individually responsible for communal SuDS assets.

9 Green infrastructure statement

9.1 Requirement and approach

Planning Policy Wales Edition 12 requires a proportionate Green Infrastructure Statement with planning applications. It must explain the baseline, demonstrate the step-wise approach and show how the scheme will provide a net benefit for biodiversity and strengthen ecosystem resilience. Future Wales Policy 9, the Environment (Wales) Act 2016 section 6 duty and LDP policies SP10, CW4, CW5 and CW6 reinforce that approach.

9.2 Baseline green infrastructure

Victoria House is a previously developed site dominated by building, parking and hardstanding. Existing green infrastructure within the red line is limited and fragmented, with boundary vegetation providing the principal soft element. The site is not identified as intersecting a statutory nature-conservation designation or mapped ancient woodland. The open land and recreation area east of the site provide a broader green setting and potential ecological connection.

The low apparent baseline does not remove the need for survey. The existing building may support bats or nesting birds and an up-to-date ecological appraisal should confirm species and habitat conditions before demolition. The final GI package should respond to that evidence and be shown on a coordinated landscape/ecology plan.

9.3 Step-wise approach

Step	Application to Victoria House	Result
Avoid	Redevelop an existing brownfield plot rather than greenfield land; no designated habitat is lost; retain feasible boundary vegetation; avoid unnecessary lighting of the open eastern edge.	Major habitat and landscape impacts are avoided at the location and layout stage.
Minimise	Use a compact footprint; protect retained vegetation and soils; control demolition timing for nesting birds; direct light away from planting and open land; apply pollution controls.	Reduces disturbance, fragmentation and construction effects.
Mitigate / restore	Provide a new perimeter planting structure, adequate soil volumes, native/pollinator planting, replacement trees, rain gardens/bioretenion and reinstated soils.	Restores functions currently suppressed by building and hardstanding.
Compensate	If surveys identify loss of a bat roost, bird nesting feature or other protected habitat that cannot be retained, provide species-specific replacement features and follow any licence/mitigation strategy.	Ensures unavoidable residual effects are addressed lawfully and proportionately.
Enhance	Integrate durable bat and bird boxes/bricks, pollinator planting, SuDS habitat, connected tree/shrub cover and a funded RSL maintenance regime.	Delivers a net benefit and improves resilience, amenity, shade and water management.

9.4 Multi-functional GI package

The architectural site plan already establishes the spatial framework: new planted areas along the eastern, southern and western boundaries; additional trees; a landscaped entrance; compact parking; and retained permeability to the open eastern setting. The detailed landscape and SuDS design should convert that framework into a measurable, maintainable package.

- new native or locally appropriate climate-resilient trees with sufficient rooting volume and a replacement obligation for failures;
- a layered shrub, grass and perennial palette that extends seasonal nectar and pollen resources;
- rain gardens, bioretention or planted conveyance features wherever the drainage and ground evidence allows;
- integrated bat and bird features selected by the project ecologist and positioned for appropriate aspect, height and flight access;
- warm, low-spill lighting with dark zones along the eastern planted edge;
- permeable boundaries and planting continuity where security requirements allow; and
- resident-facing interpretation or management information so the landscape and SuDS are understood and protected.

9.5 Biodiversity net benefit and ecosystem resilience

The proposal can deliver a clear net benefit because the starting condition is dominated by sealed surfaces and a low-value building envelope. The gain is not represented by planting alone: it combines increased vegetated area, greater structural diversity, new nesting/roosting opportunities, reduced and treated runoff, shade, carbon sequestration, pollinator resources and a stronger connection to the eastern green setting.

The five attributes of ecosystem resilience are addressed as follows: diversity through varied native planting and species features; extent through a larger soft-landscape area; condition through designed soils and funded maintenance; connectivity through continuous perimeter planting; and adaptability through climate-resilient species, water management and replacement provisions.

9.6 Delivery, monitoring and management

A pre-commencement or pre-occupation landscape/ecology condition can secure the final planting schedule, protected-species measures, lighting limits, establishment programme and a minimum five-year replacement period. Longer-term management should transfer to the RSL and form part of its estate budget. SuDS planting will be covered by both the landscape and drainage maintenance schedules.

GI CONCLUSION

The scheme follows the step-wise approach, avoids designated habitat loss, replaces sealed and fragmented land with a connected planted structure, and can secure species-specific enhancements and SuDS functions under one long-term RSL management regime. With the detailed ecology and landscape package conditioned, it will provide a net benefit for biodiversity and comply with PPW 12 and Future Wales Policy 9.

10 Conclusions and planning balance

The redevelopment of Victoria House is a policy-compliant regeneration proposal with unusually strong affordable-housing and management benefits. It makes efficient use of a central brownfield site, sits within the settlement boundary, and follows a previous full permission for residential redevelopment. The proposed amount and form are supported by the accessible location and by a three-storey design that is articulated, landscaped and capable of protecting surrounding amenity.

The delivery of 28 social-rented homes makes a direct response to the 2024 assessed need for 160 social-rented homes per year across the County Borough. The one-bedroom homes are self-contained, lift-served and designed for long-term RSL ownership or management.

Particular weight should be given to the qualitative change from the authorised HMO model. Up to 13 temporary-accommodation rooms will be replaced by 28 permanent apartments, each with independent facilities. A single RSL will take responsibility for tenancies, repairs, common systems, parking, waste, landscape, drainage and planned maintenance. That is a tangible improvement in housing quality, accountability and neighbour liaison, expressed without adverse assumptions about HMO residents.

Planning benefit	Weight in favour
Housing	28 additional self-contained homes in an established settlement.
Affordability	100% social rent, contributing materially to identified need.
Management	One regulated RSL with whole-site responsibility and planned maintenance.
Regeneration	Removal of an inefficient low-rise building and extensive hardstanding.
Placemaking	Coherent three-storey form, active elevations, durable materials and landscaped boundaries.
Sustainable travel	Local-centre accessibility, 32 cycle spaces and managed 0.5 car space per dwelling.
Climate and water	PV panels, compact form and a statutory SuDS-led drainage strategy.
Green infrastructure	New trees, planting, SuDS habitat and species features with funded maintenance.
Heritage/amenity	A design capable of preserving the nearby conservation-area character and protecting neighbours through detailed controls.

No identified policy conflict outweighs those benefits. Matters of technical detail—ecology, ground conditions, drainage calculations, acoustic/ventilation performance, construction, parking management and final landscape specification—are capable of resolution through the accompanying reports, SAB process and proportionate conditions. Affordable tenure and RSL delivery can be secured by obligation.

OVERALL CONCLUSION

The proposal accords with the development plan when read as a whole and is strongly supported by national policy on affordable housing, placemaking, brownfield regeneration, active travel, sustainable

drainage and biodiversity. Planning permission should be granted subject to the necessary obligation and proportionate conditions.