Cynllun Datblygu Lleol Cyngnor Bwrdeistref Sirol Merthyr Tudful (2016-2031) Merthyr Tydfil County Borough Council Local Development Plan (2016-2031)

PAPUR BRIFFO | BRIEFING PAPER Sustainable Drainage Systems (SuDS)

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1. Introduction

- 1.1 This briefing paper has been prepared in response to the Inspector's request for further information in his letter dated 25th April 2019, regarding the implications of the new Sustainable Drainage Systems Standards for Wales and requirements for SuDS Approval Body (SAB) approval.
- 1.2 From 7th January 2019 the application of the Sustainable Drainage Systems Standards for Wales and SAB approval has been mandatory for new developments of more than one dwelling house or construction of a building or other structure covering an area of land equal to or greater than 100 square meters.
- 1.3 The regime is relatively new with few approvals having progressed through the local authority SAB approval process as of May 2019. This is due to transitional arrangements that exempt new development proposals where a valid planning application had been received but not determined by 7th January 2019.
- 1.4 On considering an application for approval the SAB must; grant it, if satisfied that the drainage system if constructed as proposed will comply with the Statutory SuDS Standards; or refuse it if not satisfied.
- 1.5 This paper provides further information regarding the assessment of LDP sites and potential implications on the level of planned growth (number of dwellings) in the area and development viability.

2. Legislation

- 2.1 Schedule 3 of the Flood and Water Management Act 2010 makes SUDs a mandatory requirement for all new developments. Welsh Government has also prepared the following documents in order to address the SAB process:
 - The Sustainable Drainage (Appeals) (Wales) Regulations 2018;
 - The Sustainable Drainage (Approval and Adoption Procedure) Regulations 2018;
 - The Sustainable Drainage (Enforcement) (Wales) Order;
 - The Sustainable Drainage (Application for Approval Fees) Regulations 2018;
 - The Sustainable Drainage (Approval and Adoption) (Wales) Order 2018.
- 2.2 The requirement for SAB approval applies to all construction work which has drainage implications where the development or redevelopment is more than a single dwelling house or involves the construction of a building or other structure covering an area of land equal to or greater than 100 square meters.
- 2.3 In the context of new development falling under the Town and Country Planning (Use Classes) Order 1987 (as amended), guidelines have been produced by Welsh Government in order to clarify whether or not SAB approval is required on certain types of development. It is recommended that applicants/developers still contact the SAB in order to definitively determine if SAB approval is required.

3. Statutory Standards for Sustainable Drainage Systems (2018)

- 3.1 The statutory SuDS Standards contain a number of introductory principles for surface water management which SuDS schemes will need to address. Applicants must demonstrate how they have complied with these principles or provide justification for any departure. In doing so, there are six design standards that SuDS schemes need consider:
 - S1 Runoff destination (Hierarchy Standard)
 - S2 Hydraulic control
 - S3 Water quality
 - S4 Amenity
 - S5 Biodiversity
 - S6 Construction, operation and maintenance
- 3.2 There are two types of standards. Standard S1 is a hierarchy standard which provides criteria for prioritising the choice of runoff destination, whereas the (although remaining standards S2 _ S6 are fixed standards the extent/appropriateness of features required under these standards will be informed by the development scale and type and the runoff destination agreed under Standard S1).
- 3.3 Under Standard S1 there are 5 prioritised levels for identifying surface water runoff designations. These are: surface water harvesting for non-potable water use (level 1), infiltration to ground (level 2), discharge to a surface water body (level 3), discharged to a surface water sewer, highway drain, or another drainage system (level 4) and finally, discharge to a combined sewer (level 5). Level 1 should be met to the maximum extent possible, with lower levels used where required and where justification can be provided. Different levels may be suitable for different parts of a site, and more than one level may be required to sufficiently drain the site.
- 3.4 The sustainable drainage features proposed will also need to satisfy Standards S2 S6 which set out the design criteria that all sustainable drainage features should satisfy for their construction, operation and maintenance. The aim of Standard S2 (Hydraulic Control) is to manage the surface water runoff from and on a site to protect people on the site from flooding from the drainage system for events up to a suitable return period, to mitigate any increased flood risk to people and property downstream of the site as a result of the development, and to protect the receiving water body from morphological damage. Standard 2.1 requires that surface water should be managed to prevent, so far as possible, any discharge from the site for the majority of rainfall events of less than 5mm.
- 3.5 The guidance advises (at paragraph G2.14) that interception mechanisms are based on runoff volume reduction using rainwater harvesting, evapotranspiration and infiltration processes. Infiltration rates of soils can be marginal (in terms of their use for infiltration system design for large events), but they can be extremely effective at providing Interception. This reinforces the importance of vegetative and soil based SuDS components being used. For smaller sites, a simplified

approach to delivering Interception can be used based on assumed compliance of various drainage components. These components can include for example, green roofs, rainwater harvesting systems, soakaway/infiltration systems, permeable surfaces, swales, infiltration trenches, detention basins, bioretention areas and rain gardens, ponds.

3.6 The type of scheme that will be appropriate will therefore vary depending on the site specifics and drainage schemes will need to be integrated into the detailed proposals. In most cases, there will be limited details available regarding the design and layout of development proposals at the strategic planning stage. The Sustainable Drainage statutory guidance suggests that an opportunities mapping exercise in consultation with the SAB could help identify the best location and opportunities for SuDS.

4. Replacement LDP Site Allocations and Site Assessments

- 4.1 The site assessments for the Replacement LDP Deposit Plan are detailed in the Site Assessments background paper (June 2018) Document SD46. These site assessments were undertaken in accordance with the previous statutory regime for drainage and drainage connections i.e. where SuDS and green infrastructure opportunities existed, these were identified.
- 4.2 In addition, where previous studies have indicated that on site attenuation would be required, (e.g. due to topography, known ground conditions and local infrastructure), costs for these works were included in the case study sites used in the broad level LDP development viability assessment (SD34).
- 4.3 As there is now a requirement to apply the statutory sustainable drainage standards, and for SAB approval, this background paper has reviewed the likely on-site opportunities for sustainable drainage in consultation with the Sustainable drainage Approval Board, and concluded whether allocated sites can remain viable in regard to delivering the number of housing units anticipated in the Replacement LDP.
- 4.4 With regards to strategic planning and Local Development Plans, the Sustainable Drainage Statutory Guidance advises that sustainable drainage is considered at an early stage so that developments can accommodate surface features which are more likely to provide multiple benefits (paragraph 2.18). The guidance goes on to recommend consultation with relevant local expertise, such as catchment and coastal partnerships, local wildlife trusts and ecologists. The best results will be obtained if this is initially undertaken at the master planning stage, if there is one, or otherwise at the pre-application stage (paragraph 2.23).
- 4.5 The Council's engineers have advised that if designed in line with the standards and the SAB is engaged at an early design stage, SuDS can be integrated through a development with multiple SuDS features that provide multiple benefits (biodiversity, amenity etc). Pipe to pond type systems are no longer acceptable and if designed correctly future schemes could result in more developable land when compared to simple pipe to pond type systems. Where possible, the use of public open spaces should be used to act as storage during extreme events and

the use of landscaped SuDS components that take up little space and are easily maintainable should be encouraged.

- 4.6 The review process has identified the implications, and a number of site specific recommendations, of the new drainage regime for each Replacement LDP site allocation where construction has not commenced.
- 4.7 Appendix 1 analyses the housing and employment allocations included in the Replacement LDP in regard to their potential to incorporate an appropriate drainage solution, and still be able to deliver the proposed development on the site (e.g. the number of dwellings proposed, or an appropriate mass of employment buildings).
- 4.8 The analysis takes into account comments from stakeholders such as the Council's Countryside and Engineering sections, and identifies any drainage implications and recommendations for the sites. The Council considers that a number and range of SUDs measures can be included within development at the standard net density of approximately 30 dwellings per hectare assumed for housing allocations within the LDP. However, in order to maximise the likelihood of sites delivering the anticipated number of dwellings, and an appropriate drainage solution, the assessments in Appendix 1 have examined the gross area of the allocated sites.
- 4.9 It should also be noted that these findings have been based on the best information available at the present time and are without prejudice to future SAB applications. In order to firmly identify drainage solutions for any developments, appropriate surveys, such as a full ground investigation report, will be required.

5. Development Viability

- 5.1 The Statutory Welsh Government guidance indicates that the incorporation of SuDS can be costs beneficial to developers and Welsh Government has indicated that compliance with the SUDS standards will be costs neutral.
- 5.2 There is currently limited baseline cost information available due to there being no local examples of approved schemes that have progressed through the system to date. While cost information may become available to incorporate into the Plan's development viability assessment, these are unlikely to be representative of typical SuDS costs during the Plan period, at least in the short term, whilst developer and design practices in meeting the Sustainable Drainage Standards develop.
- 5.3 Furthermore, there is likely to be large variance in scheme costs as these will respond to individual site characteristics and development proposals. For example, the commuted sums required to maintain and/or replace the drainage system will vary dependent on the exact nature of the drainage system proposed.
- 5.4 Notwithstanding this, costs for physical attenuation works have been assumed for 5 out of the 11 case study sites, where these were considered necessary due to the characteristics of the site. Page 4 of Appendix 1 of the Viability Report lists additional infrastructure costs that were considered in the assessments such as

attenuation, ground stabilisation works and dealing with ground contamination. The assessments of these sites indicate that, where drainage attenuation works would be required, the development site remained financially viable. These sites are located at a variety of locations across the County Borough, and are of differing sizes, therefore giving a reasonable indication, at this point in time, of the financial cost of any potential drainage works required.

- 5.5 There will be some additional application and development costs which are summarised below. The Council considers that much of the development costs of incorporating SuDs into development proposals will become cost neutral as practice develops.
- 5.6 The local authority is required to adopt sustainable drainage infrastructure and there are instances where commuted sums will be required to cover the future costs of maintenance and replacement where hard infrastructure is proposed.
 - Commuted Sums

The use of commuted sums for maintenance is well established. However, there has been considerable variation in their use across Welsh Local Authorities.

Securing a sustainable funding mechanism for the lifetime of development will be a key objective of the SAB. SABs have a responsibility for the management and maintenance of SuDS assets. Commuted sums aim to ensure that the SAB has the resources to cover the upkeep and (where appropriate) the replacement of the assets they have adopted. The effectiveness of SuDS and the associated multiple benefits will rely on appropriate maintenance.

In order to ensure consistency throughout Wales we recommend the use of the industry standard guidance "Commuted Sums for Maintaining Infrastructure Assets" prepared by the CSS (County Surveyors Society), to calculate commuted sums for all drainage assets being adopted by the SAB

• Bond Payments

Non-performance bonds may be required by the SAB as a condition of approval to ensure the SAB has the financial means to remediate poorly constructed or incomplete SuDS.

Assessing the value of the bond is expected to be the subject of detailed discussions between the SAB and developer, before the bond value and its manner of release is set as a condition of approval. Where available industry standard guidance should be used to calculate costs.

The bond will be payable to the SAB if it certifies that the drainage system:

- has been constructed in a manner that is not in accordance with the approved proposals; or
- is unlikely to be completed.

Where the bond has not been drawn down and the SAB is satisfied that the drainage system has been constructed and functions in accordance with approved proposals, the SAB must release the bond:

- within 4 weeks beginning on the first day after the SAB has given notice of its decision to adopt, or
- within 4 weeks of its decision in response to a request to adopt

6. Conclusion

- 6.1 The new sustainable drainage consenting regime has come into place during the latter part of the preparation timescales of the Replacement LDP. Whilst the requirement for SAB approval has only come into place in January 2019, the Council had already considered the opportunities for SUDs through the assessment of Candidate Sites that were submitted as part of the LDP process.
- 6.2 This paper goes further than those initial site assessments and examines existing infrastructure and opportunities for each allocated site. The Council considers that the assessments in this paper demonstrate the sites allocated within the Replacement LDP can viably support sustainable drainage solutions, in terms of economic viability and physical capacity, and can realise the levels of growth in order to deliver the Replacement LDP strategy.
- 6.3 Where issues were identified in terms of the capacity of sites, changes have been proposed, either extending the boundary of the site to increase the flexibility of the site in terms of dealing with drainage issues and delivering the level of housing indicated, or reducing the number of dwellings in order to increase the scope for an acceptable drainage solution. In summary, these changes include:

• SW3.8 – Land South of Castle Park

The extension of the site boundary to include the remainder of a field to the south west of the site allocation (approx. 0.4ha) to increase the flexibility the site has in accommodating both the proposed number of dwellings, and a suitable drainage solution.

• SW3.15 - Goetre Primary School

The Council considers that it is appropriate to extend the site boundary to include land to the west of the site (approx. 0.4ha) in order to increase the flexibility the site has in accommodating both the proposed number of dwellings, and a suitable drainage solution.

• SW3.19 – Twynyrodyn

No changes are proposed to the site boundary however, the number of dwellings proposed will be reduced to 120.

• SW3.21 – Bradley Gardens 2, Penyard

No changes are proposed to the site boundary however, the number of dwellings proposed will be reduced to 90.

6.4 These changes to the Replacement LDP will be contained in proposed Matters Arising Changes (MACs) as part of the Council's Hearing Statement for Matter 4: Strategic and Housing Site Allocations.



Allocation Site Name Hoover Site 2



Site Ref	SW3.1	Gross site area (ha)	14.42
Site	Hoover Factory Site	Net Developable Area (ha)	9
Name			
Number	440	Undeveloped area (ha)	5.42
of		Dwellings per hectare on net area	48.9
dwellings			

Site assessment and SUDS opportunities

A masterplan has been prepared to assist in delivering the site, and to inform the Replacement LDP. The Hoover Strategic Regeneration Area (HSRA) Masterplan contains a proving layout which demonstrates that the level of growth proposed (440 dwellings) can be accommodated on 9 hectares of land. The relatively high dwellings per hectare figure on the net area is due to the proposals for the development to incorporate higher density dwellings such as flats, apartments and townhouses, in order to capitalise on the sites public transport links.

The masterplan has allowed for 4.01ha of functional green open space including green corridors and equipped play areas. Depending upon the precise nature of open space delivered on the site, there is likely to be sufficient scope to use the open space provided as part of the development in order address at least some of the drainage works required.

The relatively flat nature of the site, and the fact that it is currently predominantly hard surface, should enable attenuation solutions to be achieved through a number of means such as permeable hard surfacing; surface run-off leading to peripheral rains gardens; and/or attenuation ponds with controlled outflow.

6Implications and Site Recommendations

- Development of the site should be in accordance with the sustainable Placemaking design principles set out LDP Policy SW6. E.g. bringing "the River setting 'into' the site through incorporating water features/SUDS/watercourses in the public realm."
- This should be informed by the HSRA concept plan and framework masterplan.
- No changes are proposed to the site boundary or to the number of dwellings proposed.



Allocation Site Name Upper Georgetown Plateau

Allocation Site Number SW3-3



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Site Ref	SW3.3	Gross site area (ha)	2.47
Site	Upper Georgetown	Net Developable Area (ha)	1.75
Name	Plateau		
Number	50	Undeveloped area (ha)	0.72
of		Dwellings per hectare on net area	28.6
dwellings			
Site assess	ment and SUDS opportunities	i	
vegetated ingress and the site bo Developed porosity o covered o The net o developm	d with good tree cover whic d run off in its current format undary in order to maintain t d areas of the site should dro f the substrate and the like areas are not retained are like developable area of the si	ly consisted of industrial blast furnace h serves as an important feature to . As much tree cover as possible sho his function. ain to existing drainage channels, bu ely intensity of the development if ely to result in the need for other drain te is 1.75ha, and depending on t ent scope in the remaining area (slow down the rate of build be retained within at the potential lack of the vegetated / tree hage features. he precise nature of
	ns and Site Recommendatior	IS	
•			



Allocation Site Name Brondeg, Heolgerrig **Allocation Site Number** SW3-4



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Allocation

SINCs

Existing Woodland / Trees **Outside Unitary Authority**

OS Water Network Data Risk of Flooding from Surface Water Extent 1 in 30 Extent 1 in 100 Extent 1 in 1000

Site Ref	SW3.4	Gross site area (ha)	2.75
Site	Brondeg	Net Developable Area (ha)	1.8
Name			
Number	50	Undeveloped area (ha)	0.95
of		Dwellings per hectare on net area	27.8
dwellings			
Site assess	ment and SUDS opportunities	;	
feature to	slow down the rate of ingre	he site) with good tree cover which ess and run off in its current format. A ite boundary in order to maintain this	As much tree cover as
the site, b central op The net c developm	ut there remains the likeliho en space that acts as a surfo developable area of the s	ain to existing drainage channels at bod that other drainage features m ace water drain may be appropriate ite is 1.8ha, and depending on t ent scope in the remaining area	hay still be required. A he precise nature of
the site, b central op The net c developm appropriat	ut there remains the likeliho en space that acts as a surfo developable area of the s ent, there should be suffici	bod that other drainage features mace water drain may be appropriate ite is 1.8ha, and depending on t ent scope in the remaining area	hay still be required. A he precise nature of



Allocation Site Name Land at Erw Las, Gellideg



Site Ref	SW3.5	Gross site area (ha)	0.35
Site	Erw Las, Gellideg	Net Developable Area (ha)	0.35
Name			0.00
Number	10	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	28.6
dwellings			
	ment and SUDS opportunities		
important cover as p to maintain Developed	feature to slow down the ra ossible should be retained (ir n this function. d areas of the site should dra	y around the perimeter of the site te of ingress and run off in its current addition to new planting) within the ain to existing drainage channels to t er drainage features may still be r	f format. As much tree site boundary in order he East of the site, but
	, , , ,	n an individual dwellings scale, rathe	r than dealing with the
	noie, given indi the net deve ns and Site Recommendation	elopable area covers all of the site.	
	Development should take pl and Placemaking, and El concerning drainage and the Retention of as much vege solution for the developmen considered for incorporation. Surface attenuation is most lil	ace in accordance with Policies SW nW4: Environmental Protection w e water environment. etation cover as possible will assist at, and the watercourse to the east	rith regard to issues in finding a drainage of the site should be permeable paving.



Allocation Site Name Winchfawr



Site Ref	SW3.7	Gross site area (ha)	3.13
Site	Winchfawr	Net Developable Area (ha)	1.65
Name	00		1.40
Number	20	Undeveloped area (ha)	1.48
of		Dwellings per hectare on net a	rea 12.1
dwellings			
Site asses	sment and SUDS oppo	rtunities	
The site lie	es is situated over two l	evels which are separated by an existin	ng watercourse.
•		er drainage features may still be requir an individual dwellings scale as the c	development proposed will
consist of variety of Potential	larger, self-build plot measures. re-profiling of the site	an individual dwellings scale as the c s, which will physically have enough could make use of channels running	development proposed will room to accommodate a
consist of variety of Potential runoff, slo	larger, self-build plot measures.	an individual dwellings scale as the c s, which will physically have enough could make use of channels running site.	development proposed will room to accommodate a



Allocation Site Name Land South of Castle Park, Twyncarmel



Site Ref	SW3.8	Gross site area (ha)	5.3
Site	South of Castle Park	Net Developable Area (ha)	5.3
Name			
Number	160	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	30.2
dwellings			
Site assess	sment and SUDS opportunities		
The propo	osed density of the site does	at present give significant scope to	incorporate drainage
	nto any proposed open spac		
The site n	eeds to allow for through flo	ow of drainage in a south-west to i	north-east direction. A
central po	ond or basin within the develo	opment could prove an effective sol	ution. The site currently
has very li	ttle tree cover, which exacerl	bates any surface run off issues. Existir	ng physical features on
site such o	as hedgerows and field bound	daries could also be referenced in dr	ainage solutions.
	ons and Site Recommendation		
•	Development should take pl	ace in accordance with Policies SW	11: Sustainable Design
		nW4: Environmental Protection w	
	concerning drainage and the		J
•	Introduction of significant pla	anting as a component of developr	nent would contribute
	to attenuating flows. Also so	cope to use existing and new topo	graphy on the site to
	_	ons. A central pond/basin, alongsia	
		I provide an effective solution.	
•	-	is appropriate to extend the site bo	oundary to include the
		buth west of the site (approx. 0.4ha) in	
	flexibility the site has in acco	mmodating both the proposed numb	per of dwellings, and a
	•	mmodating both the proposed numl A proposed Matters Arising Change	-



Allocation Site Name Trevor Close, Pant



Site Ref	SW3.10	Gross site area (ha)	1.15
Site	Trevor Close, Pant	Net Developable Area (ha)	1.15
Name		Her Developable Area (ha)	1.10
Number	20	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	17.4
dwellings			
Site asses	sment and SUDS opportur	nities	
An existin	a watercourse that runs th	brough the centre of the site provides a	
an area d developm immediat	of green space that is intenent. There is then scopely to the South of the si	hrough the centre of the site provides ar egrated with a drainage solution approp be for this area to integrate with an te and create a larger green space the hal benefit for the wider community.	oriate for the proposed area of open space
an area d developm immediat solution, c	of green space that is intenent. There is then scopely to the South of the signal and area of recreation on the signal and Site Recommended by the second site second	egrated with a drainage solution approp be for this area to integrate with an te and create a larger green space the al benefit for the wider community.	priate for the proposed area of open space at provides a drainage



Allocation Site Name East Street, Dowlais

Allocation Site Number SW3-11





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SINCs Existing Woodland / Trees

Outside Unitary Authority



Site Ref	SW3.11	Gross site area (ha)	0.29
Site	East Street, Dowlais	Net Developable Area (ha)	0.29
Name			
Number	10	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	34.5
dwellings			

Site assessment and SUDS opportunities

Site is constrained by its size and topography, however drainage issues could be addressed by ensuring that hard surface areas are to be made permeable with infiltration to subterranean attenuation tanks.

Rain gardens that utilise urban tree planting could also provide a solution, as well as the use of hollow cell subterranean structures to act as attenuation storage in combination with street tree planting.

Implications and Site Recommendations

- Development should take place in accordance with Policies *SW11*: Sustainable Design and Placemaking, and EnW4: Environmental Protection with regard to issues concerning drainage and the water environment.
- Site is constrained, however subterranean storage and permeable hard surfacing measure should enable a suitable solution for the site.
- No changes are proposed to the site boundary or to the number of dwellings proposed.



Allocation Site Name Pen-y-dre



Site Ref	SW3.14	Gross site area (ha)	1.55
Site	Pen y Dre Fields, Gurnos	Net Developable Area (ha)	1.55
Name	,	,	
Number	40	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	25.8
dwellings			
Site assess	ment and SUDS opportunities	5	
a lower lev Land adjo	vel and may lend itself to pro	however an area at the south easter viding the drainage solution for the d nder the same ownership and has ge measures.	evelopment.
Implicatio	ns and Site Recommendatior	15	
•	and Placemaking, and E concerning drainage and th Linear swales or an attenuc	lace in accordance with Policies SW mW4: Environmental Protection w e water environment. Ition ditch along the southern boun pitalising on the area at the south eas	rith regard to issues dary of the site could



Allocation Site Name Goetre, Gurnos and St Aloysius school sites



Site Ref	SW3.15	Gross site area (ha)	3.82
Site	Goetre Primary School	Net Developable Area (ha)	3.82
Name			
Number	120	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	31.4
dwellings			
Site assess	sment and SUDS opportunitie	es	
any propo possible.		site, however there are still a numbe	-
run throug developm Developm	nent of this site.	ctored in to any drainage solutions ke use of the southern boundary of t	proposed as part of
run throug developm Developm much veg	gh the park could be fac nent of this site. nent of the site should mak	ctored in to any drainage solutions ke use of the southern boundary of t	proposed as part of



Allocation Site Name Former Merthyr Care Home,



Site Ref	SW3.16	Gross site area (ha)	0.2
Site	Former Merthyr Care	Net Developable Area (ha)	0.2
Name	Home		
Number	20	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	100
dwellings			
Site assess	ment and SUDS opportunities	5	
proposed	open space on the site. If	limits the scope to incorporate drain development of the site takes the f	o ,
proposed existing bu	open space on the site. If vilding, then SAB approval wo	development of the site takes the fould not be required.	o ,
proposed existing bu	open space on the site. If vilding, then SAB approval wa	development of the site takes the fould not be required.	form of converting the
proposed existing bu Implicatio	open space on the site. If vilding, then SAB approval wo ns and Site Recommendation Development should take p and Placemaking, and E concerning drainage and th Rain gardens and street tree solution.	development of the site takes the fould not be required. ns lace in accordance with Policies SW mW4: Environmental Protection w	<i>(11: Sustainable Design</i> <i>vith regard to issues</i> to provide a drainage



Allocation Site Name Hillcrest Park/Haydn Terrace



Site Ref	SW3.17	Gross site area (ha)	2.24
Site	Haydn Terrace,	Net Developable Area (ha)	1.3
Name	Penydarren		
Number	40	Undeveloped area (ha)	0.94
of		Dwellings per hectare on net area	30.8
dwellings			
Site assessment and SUDS opportunities			
The site slopes steeply from west to east and has limited tree/vegetation cover.			
There is little hard surface treatment on site, and therefore the site is able to provide some			

There is little hard surface treatment on site, and therefore the site is able to provide some attenuation in heavy periods of rainfall. An attenuation pond/basin at the south east corner of the site may provide a suitable drainage solution whilst capitalising on the topography of the site. Increased planting is also recommended in order to slow down rates of surface run off.

Implications and Site Recommendations

- Development should take place in accordance with Policies SW11: Sustainable Design and Placemaking, and EnW4: Environmental Protection with regard to issues concerning drainage and the water environment.
- A series of swales and ponds would potentially make the most efficient use of the site in regard to a drainage solution.
- No changes are proposed to the site boundary or to the number of dwellings proposed.



Allocation Site Name Penheolferthyr, Twynyrodyn


Site Ref	SW3.19	Gross site area (ha)	5.76
Site	Twynyrodyn	Net Developable Area (ha)	4.2
Name			
Number	150	Undeveloped area (ha)	1.56
of		Dwellings per hectare on net area	35.7
dwellings			

The site slopes from north to south and is traversed by several existing watercourses. There is significant tree/vegetation cover along the east and west perimeter of the sites which should be incorporated into the layout of development. An indicative layout has been submitted to the Council by a national housebuilder that indicates that 120 dwellings are able to be accommodated on the site.

There is little hard surface treatment on site, and therefore the site is able to provide some attenuation in heavy periods of rainfall. An attenuation pond/basin at the south of the site may provide a suitable drainage solution whilst capitalising on the topography of the site. Increased planting is also recommended in order to slow down rates of surface run off.

The development needs to make use of drainage as a feature, and incorporate open space as a place where a natural landscape will provide the necessary attenuation through good design practice.

- Development should take place in accordance with Policies SW11: Sustainable Design and Placemaking, and EnW4: Environmental Protection with regard to issues concerning drainage and the water environment.
- A series of swales and ponds would potentially make the most efficient use of the site in regard to a drainage solution. Rain gardens that front onto open watercourses and free draining paved areas may also be appropriate.
- No changes are proposed to the site boundary however, the number of dwellings proposed will be reduced to 120. This change will be reflected in proposed Matters Arising Changes to be included in the Council's Hearing Statement for Matter 4: Strategic and Housing Site Allocations.



Allocation Site Name Former Mardy Hospital, Twynyrodyn



Site Ref	SW3.20	Gross site area (ha)	3.41
Site	Former Mardy Hospital,	Net Developable Area (ha)	1.41
Name	Twynyrodyn		
Number	114 (50 units remaining)	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	35.5
dwellings			
Site asses	sment and SUDS opportunities	S	
The site sl	opes from north-east to sou	th-west and has significant tree cov	ver along the southern
	•	th the part of the site that has alread	-
boorraal,	, and along the beendary wi		
D			
Retainina	the existing tree/vegetation	cover on site will assist in mitigating	a the effect of surface
-			-
-		opriate location of open/green space	-
water run	-off. New planting, and appr	opriate location of open/green space	-
water run	-off. New planting, and appr		-
water run provide a	-off. New planting, and appr n appropriate drainage solut	opriate location of open/green spacion for the proposed development.	e within the site, could
water run provide a The devel	-off. New planting, and appr n appropriate drainage solut opment needs to make use	opriate location of open/green spac ion for the proposed development. of drainage as a feature and incorpo	e within the site, could brate open space as a
water run provide a The devel place wh	-off. New planting, and appr n appropriate drainage solut opment needs to make use	opriate location of open/green spacion for the proposed development.	e within the site, could brate open space as a
water run provide a The devel place wh practice.	-off. New planting, and appr n appropriate drainage solut opment needs to make use ere a natural landscape wil	opriate location of open/green spac ion for the proposed development. of drainage as a feature and incorpo I provide the necessary attenuation	e within the site, could brate open space as a
water run provide a The devel place wh practice. Implicatio	-off. New planting, and appr n appropriate drainage solut opment needs to make use ere a natural landscape wil	opriate location of open/green spac ion for the proposed development. of drainage as a feature and incorpo I provide the necessary attenuation	e within the site, could orate open space as a through good design
water run provide a The devel place wh practice. Implicatio	-off. New planting, and appr n appropriate drainage solut opment needs to make use ere a natural landscape wil ons and Site Recommendation Development should take p	opriate location of open/green spac ion for the proposed development. of drainage as a feature and incorpo I provide the necessary attenuation ns lace in accordance with Policies SW	e within the site, could prate open space as a through good design (11: Sustainable Design
water run provide a The devel place wh practice. Implicatio	-off. New planting, and appr n appropriate drainage solut opment needs to make use ere a natural landscape wil ons and Site Recommendation Development should take p	opriate location of open/green spac ion for the proposed development. of drainage as a feature and incorpo I provide the necessary attenuation	e within the site, could prate open space as a through good design (11: Sustainable Design
water run provide a The devel place wh practice. Implicatio	-off. New planting, and appr n appropriate drainage solut opment needs to make use ere a natural landscape wil ons and Site Recommendation Development should take p	opriate location of open/green space ion for the proposed development. of drainage as a feature and incorpor I provide the necessary attenuation ns lace in accordance with Policies SW EnW4: Environmental Protection w	e within the site, could prate open space as a through good design (11: Sustainable Design
water run provide a The devel place wh practice. Implicatio	off. New planting, and appr n appropriate drainage solut opment needs to make use ere a natural landscape wil ins and Site Recommendation Development should take p and Placemaking, and E concerning drainage and th	opriate location of open/green space ion for the proposed development. of drainage as a feature and incorpo- l provide the necessary attenuation ns lace in accordance with Policies SW mW4: Environmental Protection with water environment.	e within the site, could orate open space as a through good design (11: Sustainable Design vith regard to issues
water run provide a The devel place wh practice. Implicatio	off. New planting, and appr n appropriate drainage solut opment needs to make use ere a natural landscape wil Ins and Site Recommendation Development should take p <i>and Placemaking</i> , and <i>E</i> concerning drainage and th A central area of open space	opriate location of open/green space ion for the proposed development. of drainage as a feature and incorpo- I provide the necessary attenuation ns lace in accordance with Policies SW EnW4: Environmental Protection with the water environment. ce has the potential to capitalise on	e within the site, could prate open space as a through good design (11: Sustainable Design vith regard to issues the site characteristics
water run provide a The devel place wh practice. Implicatio	off. New planting, and appr n appropriate drainage solut opment needs to make use ere a natural landscape wil ms and Site Recommendation Development should take p and Placemaking, and E concerning drainage and th A central area of open space in terms of drainage, and p	opriate location of open/green space ion for the proposed development. of drainage as a feature and incorpo- l provide the necessary attenuation ns lace in accordance with Policies SW mW4: Environmental Protection with water environment.	e within the site, could prate open space as a through good design (11: Sustainable Design vith regard to issues the site characteristics
water run provide a The devel place wh practice. Implicatio	off. New planting, and appr n appropriate drainage solut opment needs to make use ere a natural landscape wil ns and Site Recommendation Development should take p <i>and Placemaking</i> , and <i>E</i> concerning drainage and th A central area of open space in terms of drainage, and p entire development.	opriate location of open/green space ion for the proposed development. of drainage as a feature and incorpo- I provide the necessary attenuation ns lace in accordance with Policies SW EnW4: Environmental Protection with the water environment. ce has the potential to capitalise on	e within the site, could orate open space as a through good design (11: Sustainable Design vith regard to issues the site characteristics space that serves the



Allocation Site Name Bradley Gardens Two



Site Ref	SW3.21	Gross site area (ha)	5.54
Site	Bradley Gardens 2,	Net Developable Area (ha)	2.6
Name	Penyard		
Number	100	Undeveloped area (ha)	2.94
of		Dwellings per hectare on net area	38.5
dwellings			

The site slopes from east to west and has significant tree cover along its east and west perimeter. An indicative layout has been submitted to the Council by a national housebuilder that indicates that 90 dwellings are able to be accommodated on the site.

The site offers opportunities for the creation of a wet woodland alongside existing above ground drainage lines as an integral design component of the site and as a central open space. The topography of the site, and the location of existing watercourse are likely to influence the layout of development and any potential drainage solutions.

The development needs to make use of drainage as a feature, and incorporate open space as a place where a natural landscape will provide the necessary attenuation through good design practice.

- Development should take place in accordance with Policies SW11: Sustainable Design and Placemaking, and EnW4: Environmental Protection with regard to issues concerning drainage and the water environment.
- A central area of open space has the potential to capitalise on the site characteristics in terms of drainage. Rain gardens fronting onto open water channels, and free draining paved areas may also be appropriate.
- No changes are proposed to the site boundary however, the number of dwellings proposed will be reduced to 90. This change will be reflected in proposed Matters Arising Changes to be included in the Council's Hearing Statement for Matter 4: Strategic and Housing Site Allocations.



Allocation Site Name Former St Tydfils Hospital

Allocation Site Number SW3-22



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Existing Woodland / Trees **Outside Unitary Authority**

rainag	e assets / Water courses	
	Culvert	
-	Culvert Assumed Route	
-	Open Channel	
-	OS Water Network Data	
isk of	Flooding from Surface Water	
	Extent 1 in 30	
	Extent 1 in 100	
	Extent 1 in 1000	

Site Ref	SW3.22	Gross site area (ha)	2.42
Site	Former St Tydfils Hospital	Net Developable Area (ha)	1.8
Name			
Number	50	Undeveloped area (ha)	0.62
of		Dwellings per hectare on net area	27.8
dwellings			

The site is predominantly flat, although there are areas of the site that are situated on different levels.

The former hospital site offers areas of potential drainage towards the northern part of the site as a final destination for collection. Maximum efforts should also be made to enable permeable, hard surfacing solutions across the site, in order to reflect the sites urban character.

- Development should take place in accordance with Policies SW11: Sustainable Design and Placemaking, and EnW4: Environmental Protection with regard to issues concerning drainage and the water environment.
- Rain gardens and attenuation pits beneath street trees will contribute towards the site's drainage solution. An area of soft landscaping at the north of the site should provide a significant element of the sites drainage measures.
- No changes are proposed to the site boundary or to the number of dwellings proposed.



Allocation Site Name Former Miners Hall





Site Ref	SW3.23	Gross site area (ha)	0.07
Site	Former Miners Hall	Net Developable Area (ha)	0.07
Name			
Number	12	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	171.4
dwellings			
Site assess	ment and SUDS opportunities	i	
The propo	sed high density of the site l	limits the scope to incorporate drain	age solutions into any

The proposed high density of the site limits the scope to incorporate drainage solutions into any open space on the site. If development of the site takes the form of converting the existing building, then SAB approval would not be required.

Redevelopment of the site would need to maximise rain water harvesting and other features for permeability wherever possible before discharge to existing surface water drainage system is considered.

- Development should take place in accordance with Policies *SW11*: Sustainable Design and Placemaking, and EnW4: Environmental Protection with regard to issues concerning drainage and the water environment.
- Attenuation pits beneath street trees and permeable drainage features leading to subterranean attenuation tanks are likely to be the most suitable drainage solutions.
- No changes are proposed to the site boundary or to the number of dwellings proposed.



Allocation Site Name Former Ysgol Santes Tydfil Site



Site Ref	SW3.24	Gross site area (ha)	0.78
Site Name	Former Ysgol Santes Tudful	Net Developable Area (ha)	0.53
Number	10	Undeveloped area (ha)	0.25
of		Dwellings per hectare on net area	18.9
dwellings			
Site asses	sment and SUDS opportunities	5	
	vided on site, potentially on a otential to incorporate the r	nearby Cae Mari Dwn watercourse	into the sites drainage
There is p solution.		nearby Cae Mari Dwn watercourse	into the sites drainage



Allocation Site Name Clwydyfagwr

Allocation Site Number SW3-35

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Extent 1 in 1000

Site Ref	SW3.35	Gross site area (ha)	1.79
Site	Clwydyfagwr, Swansea	Net Developable Area (ha)	1.35
Name	Road		
Number	40	Undeveloped area (ha)	0.44
of		Dwellings per hectare on net area	29.6
dwellings			
Site assess	sment and SUDS opportunitie	es	
is potentic open spac	•	ation pond/basin centrally within the s	site, forming part of an
open space An existing the existing site in orde	ce. g watercourse runs along th	e south eastern perimeter of the site. T o incorporate drainage channels alor off into any watercourses.	here is potential to use



P & R Motors, Pentrebach **Allocation Site Name**

Allocation Site Number SW3-36





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Legend

- Contours (10m interval) Exisiting Right Of Way
- Allocation
- SINCs
 - **Outside Unitary Authority**



Culvert

Culvert Assumed Route

nd R Motors,	Gross site area (ha)	0.63
	Net Developable Area (ha)	0.63
trebach		
	Undeveloped area (ha)	0.0
	Dwellings per hectare on net area	34.9
and SUDS opportunit	ies	•
ng will improve the lo	andscape and may also assist in reduci	ng run-off rates on the
d Site Recommendat	ions	
		11. Custoria albla Designa
lo P er	lacemaking, and ning drainage and	pment should take place in accordance with Policies SW lacemaking, and EnW4: Environmental Protection w ning drainage and the water environment. able hard surfacing may provide the most effective draine



Allocation Site Name Land opposite Kingsley Terrace, Aberfan



	SW3.28	Gross site area (ha)	0.34
Site	Opposite Kingsley	Net Developable Area (ha)	0.34
Name	Terrace, Aberfan		
Number	12	Undeveloped area (ha)	0.0
of		Dwellings per hectare on net area	35.3
dwellings			
Site asses	sment and SUDS opportunities	S	
	of as much existing vegeto explored in order to reduce	ation as possible, and any opportu run-off rates on the site.	nities for new planting
should be		run-off rates on the site.	nities for new planting
should be Implicatio	explored in order to reduce ns and Site Recommendation Development should take p and Placemaking, and E concerning drainage and th Individual plot attenuation,	run-off rates on the site. ns lace in accordance with Policies SW EnW4: Environmental Protection w	(11: Sustainable Design with regard to issues channel to the east of



Allocation Site Name Adjacent to Manor View, Trelewis



1	SW3.29	Gross site area (ha)	12.73 (9.68
			remaining)
Site	Adjacent to Manor View,	Net Developable Area (ha)	7
Name	Trelewis		
Number	248 (198 remaining)	Undeveloped area (ha)	2.68
of		Dwellings per hectare on net area	28.2
dwellings			
Site assess	ment and SUDS opportunities	6	
format, wit to incorpor A masterpl the value watercours boundary A large are	h a network of hedgerows a rate the existing landscape in lan was prepared as part of of the green infrastructure ses on the estern part of the also provide opportunities to	an extensive network of green infro ind wooded areas. These features wi into any drainage solutions for the pro- f the original outline application for e, particularly on the western par site, and the Nant Caiach waterco include drainage measure within the eastern corner of the site and should be proposal is for a housing estate the	Il provide opportunities posed development. the site, and highlights t of the site. Existing urse along the eastern e development layout. d be used to maximum
			e nerwork of rodus and
driveways The develo a natural k is sufficient	andscape will provide the n	ning materials. of drainage as a feature and open sp ecessary attenuation through good undeveloped area of the site to inc	ace as a place where design practice. There
driveways The develo a natural lo is sufficient drainage s	opment needs to make use c andscape will provide the n t scope on the remaining u	ning materials. of drainage as a feature and open sp ecessary attenuation through good undeveloped area of the site to inc opment.	ace as a place where design practice. There



Allocation Site Name Stormtown, Trelewis



	SW3.30	Gross site area (ha)	5.54
Site	Stormtown, Trelewis	Net Developable Area (ha)	2.8
Name			
Number	80	Undeveloped area (ha)	2.74
of		Dwellings per hectare on net area	28.6
dwellings			
Site assess	ment and SUDS opportuniti	ies	•
An existing existing to	ce. g watercourse runs along th pography of the site to inc	ation pond/basin centrally within the s he southern perimeter of the site. There corporate drainage channels along the	e is potential to use the
The developlace who	ere a natural landscape v	o any watercourses. e of drainage as a feature and incorp will provide the necessary attenuatior a the remaining undeveloped area of	n through good design
The developlace who practice.	opment needs to make use ere a natural landscape v There is sufficient scope on	e of drainage as a feature and incorp will provide the necessary attenuatior	n through good design the site (approx. half of
The developlace who practice. the total si	opment needs to make use ere a natural landscape v There is sufficient scope on	e of drainage as a feature and incorp will provide the necessary attenuation the remaining undeveloped area of variety of drainage solutions as part of	n through good design the site (approx. half of



Allocation Site Name Cwmfelin, Bedlinog



	SW3.31	Gross site area (ha)	3.57
Site	Cwmfelin, Bedlinog	Net Developable Area (ha)	1.7
Name			
Number	30	Undeveloped area (ha)	1.87
of		Dwellings per hectare on net area	17.6
dwellings			
Site assess	ment and SUDS opportunities		
number o the site an	f swales along the contour lind also to allow the introducti	veloping the site then the solution v nes to enable the speed of water fl on of native trees along such swales.	ow to be slowed from
place whe	ere a natural landscape will There is sufficient scope on th	of drainage as a feature and incorpo I provide the necessary attenuation he remaining undeveloped area of t	through good design he site (approx. half of
place whe practice. the total si	ere a natural landscape will There is sufficient scope on th	I provide the necessary attenuation ne remaining undeveloped area of t riety of drainage solutions as part of t	through good design he site (approx. half of



Allocation Site Name Cilhaul



Site Ref	SW3.33	Gross site area (ha)	1.36
Site	Cilhaul, Treharris	Net Developable Area (ha)	1.0
Name			
Number	30	Undeveloped area (ha)	0.36
of		Dwellings per hectare on net area	30.0
dwellings			
Site assess	ment and SUDS opportunities		
	a greenfield site which as gr gh hard development will inc	assland, permits a slower rate of run rease this.	off. Increased surface
be channe modified t	elled. It would be here that to allow a slower rate of run	and south of the site would be the ar the principle areas of tree planting s of as water exits the site. Within the s ells as attenuation for water also.	hould be increased or
Implication	ns and Site Recommendation	IS	
•	and Placemaking, and E concerning drainage and the Channelling surface water f provide most effective solution help with attenuation.	ace in accordance with Policies SW nW4: Environmental Protection w e water environment. Tows to areas at the north and sou tion. New planting/introduction of s	vith regard to issues with of the site likely to treet trees could also



Allocation Site Name Oaklands, Treharris







Site Ref	SW3.34	Gross site area (ha)	2.79
Site	Oaklands, Treharris	Net Developable Area (ha)	1.7
Name			
Number	50	Undeveloped area (ha)	1.09
of		Dwellings per hectare on net area	29.4
dwellings			
Site assess	ment and SUDS opportunities		
a drainage Lines of de likewise, ar	evelopment should take pla	n east, and there is potential to use t ace along the contours with water on the eastern part of the site. Add	catchments following
Implication	ns and Site Recommendation	IS	
• [• [• [and Placemaking, and Electron concerning drainage and the inked swales that follow the east of the site are likely to p development. Street trees w drainage measure.	ace in accordance with Policies SW nW4: Environmental Protection w e water environment. e contours of the site, then collect ir provide the most effective drainage with subterranean storage would also the site boundary or to the number of	ith regard to issues a pond/basin at the solution as part of any provide an effective



Scale: 1:2,500 / A4

0 10 20 30 40 50 60

parties in any form.

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Metres

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Cynllun Datblygu Lleol Merthyr Tudful 2016-2031 Merthyr Tydfil Local Development Plan 2016-2031

Allocation Site Name Hoover Site 1

Allocation Site Number EcW 1.1



Allocation

Woodland / Trees

Outside Unitary Authority

SINCs

Open Channel

Risk of Flooding from Surface Water

Extent 1 in 30

Extent 1 in 100 Extent 1 in 1000

OS Water Network Data

Site Ref	$E_{0} \wedge 1 1$	Cross site grog (bg)	1 5
	EcW1.1	Gross site area (ha)	1.5
Site	Former Hoover factory car	Net Developable Area (ha)	1.5
Name	park	Undeveloped area (ha)	0.0
Site asses	sment and SUDS opportunities		
		predominantly hard surfaced. Atten	lation of water on the
	, , ,	•	
site could	be achieved through a num	per of means.	
		of land for access roads, parking lar	
		aining 60% of the site will be ab on to the other site requirements.	le to incorporate an
appropric		on to the other site requirements.	le to incorporate an



Allocation Site Name Goatmill Road

Allocation Site Number EcW 1.2



Site Ref	EcW1.2	Gross site area (ha)	16.98
Site	Goatmill Road	Net Developable Area (ha)	14.75
Name		Undeveloped area (ha)	2.23

The site is relatively flat and is reclaimed land, consisting of compacted blast furnace waste material. Attenuation of water on the site could be achieved through a number of means although infiltration may prove difficult. Retention of existing trees and vegetation will assist in mitigating the impact of any proposed development.

A standard employment site plot ratio of 40% would indicate that 5.9 ha of land would be developed for buildings, leaving 8.85 ha of land for access roads, parking landscaping etc.

The Council considers that the remaining 60% of the site will be able to incorporate an appropriate drainage solution in addition to the other site requirements.

- Development should take place in accordance with Policies SW11: Sustainable Design and Placemaking, and EnW4: Environmental Protection with regard to issues concerning drainage and the water environment.
- There are a number of potential options for a drainage solution of this site, including; extending the length of existing drainage channels to slow water flow; creating pond features on the lower areas of the site; the creation of hard surfacing that is permeable; and maximising the incorporation of soft planted areas to act as rain gardens.
- No changes are proposed to the site boundary.



Allocation Site Name Land east of A4060 at Ffos Y Fran

Allocation Site Number EcW 1.3



Site Ref	EcW1.3	Gross site area (ha)	18.85
Site	Ffos y Fran	Net Developable Area (ha)	11.3
Name		Undeveloped area (ha)	7.55

The site is currently part of an open cast mining and land reclamation scheme, and will consist of four development plateaus when fully restored. The exposed nature of the site may result in vegetation establishment proving difficult. There remains a number of measures that could provide a drainage solution for the proposed development.

A standard employment site plot ratio of 40% would indicate that 4.52 ha of land would be developed for buildings, leaving 6.78 ha of land for access roads, parking landscaping etc.

The Council considers that the remaining 60% of the site will be able to incorporate an appropriate drainage solution in addition to the other site requirements.

- Development should take place in accordance with Policies *SW11*: Sustainable Design and Placemaking, and EnW4: Environmental Protection with regard to issues concerning drainage and the water environment.
- There are a number of potential options for a drainage solution of this site, including; lengthened swales to slow the rate of run-off; the creation of hard surfacing that is permeable; and the creation of pond/basin type features that could also have benefits for landscape and wildlife.
- No changes are proposed to the site boundary.



Allocation Site Name Land south of Merthyr Tydfil Industrial Park

Allocation Site Number EcW 1.4



Site Ref	EcW1.4	Gross site area (ha)	3.1
Site	Land South of Merthyr	Net Developable Area (ha)	3.1
Name	Tydfil Industrial Park,	Undeveloped area (ha)	0.0
Site asses	sment and SUDS opportuniti	ies	
The site is watercou		is situated immediately to the wes	st of an existing channelled
			104 la su of love of user del la s
develope The Cou	ed for buildings, leaving 1.86 ncil considers that the re	atio of 40% would indicate that 6 ha of land for access roads, parkin emaining 60% of the site will be	ng landscaping etc. e able to incorporate an
develope The Cou approprio	ed for buildings, leaving 1.86 ncil considers that the re ate drainage solution in add	5 ha of land for access roads, parkin emaining 60% of the site will be dition to the other site requirements	ng landscaping etc. e able to incorporate an
develope The Cou approprio	ed for buildings, leaving 1.86 ncil considers that the re	5 ha of land for access roads, parkin emaining 60% of the site will be dition to the other site requirements	ng landscaping etc. e able to incorporate an
develope The Cou appropric Implicatio	ed for buildings, leaving 1.86 ncil considers that the re <u>ate drainage solution in adc</u> ons and Site Recommendati Development should take and Placemaking, and concerning drainage and The introduction of an att watercourse, and incorpor	ha of land for access roads, parkin emaining 60% of the site will be dition to the other site requirements ions place in accordance with Policie EnW4: Environmental Protection	ng landscaping etc. e able to incorporate an <u>s.</u> es SW11: Sustainable Design on with regard to issues of flow before it enters the wet meadow, may provide