



Cyngor Bwrdeistref Sirol  
**MERTHYR TUDFUL**  
**MERTHYR TYDFIL**  
County Borough Council

HEARING SESSION 7  
RENEWABLE ENERGY, MINERALS, MONITORING AND OTHER MATTERS  
ACTION POINT 7.1 – COUNCIL RESPONSE

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HEARING 7 – ACTION POINT 1 RESPONSE

**Action Point**

*Council to amend LDP para 6.5.72 (as proposed to be amended in its written statement for hearing 7) to clarify:*

- *that green infrastructure may include open space and sustainable drainage, and*
- *that SUDS approval is separate from the planning application, but that both may be considered as part of a combined application submitted to the Council in its role as both LPA and SAB.*

**Council's Response**

This response has been prepared by the Council in regard to an action that arose at Hearing Session 7. In order to provide sufficient clarity with regard to the separate consenting regimes for planning permission and sustainable drainage systems the following change have been proposed. These changes will be included in the Council's Matters Arising Changes Schedule.

**Matters Arising Change**

6.5.69 The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies that they must carry out sustainable development. The planning system is central to achieving this as The Planning (Wales) Act 2015 introduced a statutory purpose for the planning system in Wales – that any statutory body carrying out a planning function must exercise those functions in accordance with the principles of sustainable development as set out in the Well-being of Future Generations (Wales) Act 2015. The Environment (Wales) Act 2016 also places a duty on all public bodies in Wales to maintain and enhance biodiversity including promoting the resilience of ecosystems through the exercise of their functions.

6.5.70 The LDP as a whole aims to ensure that Merthyr Tydfil County Borough is developed sustainably, with a strategy proposing a sustainable level of population growth. Policy SW11 will aim to guide proposals for development to create sustainable places through high quality design.

6.5.71 This policy will be a key tool in meeting LDP objectives relating to open space, design and the environment. The policy will also ensure that the level of growth proposed in the LDP strategy comes forward in an appropriate manner, considering both the context of the existing landscape and townscape, whilst also aiming to achieve the highest possible standard of design.

6.5.72 Amongst the list of detailed considerations the policy requires the provision and integration of Green Infrastructure in new development proposals **which may, for example, include open space and Sustainable Drainage System (SuDS) features.**

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The integration of Green Infrastructure is important as it can realise other positive benefits to health and wellbeing. This can include for example, the provision of healthy and active environments, flood management, water and air quality improvements, reduced noise pollution, climate moderation, climate change mitigation and food production. Examples of features that can help address these wider objectives can include landscaping, green roofs, grass verges, sustainable urban drainage, open spaces and gardens.

6.5.73 Green infrastructure is the network of natural and semi-natural features that intersperse and connect places at various scales. At the landscape scale, green infrastructure can comprise entire ecosystems such as wetlands, waterways and mountain ranges. At a local scale, it can comprise the County Borough's Local Nature Reserves, parks, fields, woodlands, public rights of way, allotments, cemeteries and gardens. At smaller scales, it can include individual features such as trees, hedgerows, roadside verges, and green roofs.

6.5.74 The Council's Biodiversity Action Plan and future Nature Recovery Action Plan will identify local biodiversity issues and opportunities for green infrastructure enhancement that can inform the planning and design of development proposals. Examples of landscape scale green infrastructure within the County Borough that can provide enhancement opportunities and which are areas of high biodiversity value include former mineral and coal spoil tips and the Coedcae (Fridd) mosaic habitats that exist on predominantly steep valley sides between the valley floor and upland areas. The Council's Open Space Strategy and associated Local Nature Reserves can also be used in the consideration of potentially suitable locations for offsite compensation where there is unavoidable loss of sites important for biodiversity.

**6.5.75 It should be noted that Sustainable Drainage Approval Body (SAB) consent is separate from the requirement for planning permission. However, both may be considered as part of a combined application submitted to the Council in its role as both Local Planning Authority and Sustainable Drainage Approval Body. Under the separate SAB Approval process, all new development (of more than 1 dwelling or where the construction area is 100 sqm or more) is required to incorporate SuDS that meets the statutory sustainable drainage standards set by Welsh Government. SAB Approval will be required before construction takes place. Therefore, it will be beneficial to consider the provision of SuDS at the earliest possible stage and as an integral part of the design process. SAB Approval is not required for the change of use of existing buildings where the original footprint and building are retained (or where the original footprint is extended less by less than 100 sqm). If the proposal includes a construction area (including preparation area), new hard standing or other structure of 100 sqm or more, SAB approval will be required.**

~~6.5.75~~**76** Other policies contained within the Plan also cover issues relating to design and placemaking due to their links with environmental and wellbeing objectives. For example, with Policy EnW4 containing key environmental protection considerations and policy EnW1 sets out the Plan's nature conservation and ecosystem resilience requirements that will need to be taken into account alongside this policy when considering any preparing development proposals.

~~6.5.76~~**77** Returns for the Development Management Quarterly Survey<sup>1</sup> will monitor the plans contribution to sustainable design and placemaking.

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<sup>1</sup> [Welsh Government Development Management Quarterly Survey](#)