

Cefn Dryscoed DAF

Planning, Design and Access Statement

February 2026

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Cefn Dryskoed DAF

Planning, Design and Access Statement

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Executive Summary

This Planning, Design and Access Statement has been prepared by Mott MacDonald Limited on behalf of Dŵr Cymru Welsh Water (DCWW) and forms part of the application to Bannau Brycheiniog National Park Authority (BBNPA) under the Town and Country Planning Act 1990.

The proposed works consist of the construction of a new dissolved air floatation (DAF) building and associated site infrastructure. This is required to enhance the function of the existing Cefn Dryskoed Water Treatment Works (WTW) reducing manganese levels and increasing water quality at the front end of the treatment process.

This Planning, Design and Access Statement provides information regarding the design of the Scheme, the approach to construction and associated works, and the proposal's compliance with local and national planning policies to support a full planning application.

1 Introduction

1.1 Application Overview

This Planning, Design and Access Statement has been prepared by Mott MacDonald, on the behalf of DCWW ('the applicant') to support a full planning application for the proposed improvement works at Cefn Dryskoed Water Treatment Works (WTW). The proposed development comprises the construction of a new dissolved air flotation (DAF) building to provide an initial treatment stage designed to reduce manganese levels and enhance overall water quality. Planning consent is required for the proposed development under the Town and Country Planning Act 1990. This statement outlines the proposed development and explains how it is acceptable in planning terms.

This Planning, Design and Access Statement has been prepared as part of a suite of documents to support the application for planning consent for the proposed Scheme and should be read in conjunction with the other documents and plans that have been submitted as part of this application. This planning application has been prepared in accordance with the validation checklist provided by Bannau Brycheiniog National Park Authority (BBNPA) as part of their pre-application advice, received in October 2025.

A planning application is to be submitted to BBNPA, as the Local Planning Authority, seeking planning permission for the following:

“The construction of a new dissolved air floatation (DAF) building to house the installation of three new DAF tanks, DAF Motor Control Centre, flocculators and other processing and ancillary equipment, the installation of new electrical cabling, distribution boards, PLC and instrumentation, pipelines to connect the new DAF building to the existing WTW including associated chambers and ducts for chemical dosing, as well as a new stone wall, fencing, drainage, soft landscaping, access track and temporary enabling works”.

Further detail of the proposed works (hereafter referred to as the 'Scheme') is set out in Section 3 of this Planning Statement.

1.2 Background to the Scheme

1.2.1 Background

Cefn Dryskoed is a direct filtration WTW supplied with water from Ystradfellte Reservoir. The existing WTW treats the incoming raw water through coagulation, flocculation and direct rapid gravity filtration.

At present, there is no dedicated manganese removal process at Cefn Dryskoed WTW as when Cefn Dryskoed WTW was designed in 1997, concentrations of manganese in the raw water were consistently below the 50 µg/l regulatory limit, meaning no dedicated manganese removal stage was required. However, there have been increasing instances of raw water manganese levels which have exceeded DCWW's internal target of less than 2µg/l manganese. In July 2022 there was a discolouration event caused by the presence of elevated levels of manganese that led to a series of customer complaints with regards to water quality. Therefore, the provision of a DAF building at Cefn Dryskoed WTW is proposed in order to deliver a permanent dedicated manganese removal stage at the front end of the treatment process to achieve DCWW's target of less than 2µg/l manganese. This will improve the quality of drinking water

1.2.2 Environmental Impact Assessment Screening

The Environmental Impact Assessment (EIA) is a process that identifies the potential significant environmental effects (both beneficial and adverse) of a proposed development. The process of EIA, in the context of the Scheme, is governed by the *Town and Country Planning (Environmental Impact Assessment) (Wales) 2017*, hereafter referred to as the 'EIA Regulations'. Under the EIA Regulations, Schedule 2 development includes development where 'any part of that development is to be carried out in a sensitive area'. Section 2 of the Regulations interprets 'sensitive areas' to include national parks. As the proposed development lies within the Bannau Brycheiniog National Park Authority area, a request for a Screening Opinion is required

On this basis, a request for a Screening Opinion under Regulation 6 of EIA Regulations was sent to BBNPA on 3 December 2025 (application reference: 25/24269/SO). The assessment considered that the proposed Scheme would not give rise to significant effects on the environment and would therefore not constitute as EIA development.

In accordance with Regulation 6(6) of the EIA Regulations, LPAs must respond to requests for Screening Opinions within 3 weeks. On this basis, the statutory deadline for BBNPA to respond was 24 December 2025. As of 12 February 2026, BBNPA are yet to respond to the assessment provided. However, based on the outcomes of the assessment it is concluded that the development does not constitute as EIA development.

1.2.3 Habitat Regulations Assessment

There is a requirement under the Conservation of Habitats and Species Regulations 2017 (as amended) ("the 2017 Regulations") to determine if a plan or project (either alone or in-combination) may affect the interest features and objectives of protected nature conservation sites at a European and International level (referred to in this report as Designated Sites). The process of undertaking this assessment is known as a Habitats Regulations Assessment (HRA). The HRA process consists of four stages, each stage being informed by the one preceding to ensure an iterative and objective assessment.

A Report to inform a HRA (Document Reference: B17545-123532-14-XX-DR-NA-EI1210) has been provided to support this application. This assesses the likely significant effects of the proposed development on the integrity of the surrounding internationally designated sites and their conservation objectives

Stage 1 HRA Screening was undertaken and included in the above report. This identified that a Stage 2 Appropriate Assessment is required, which has also been included within the report. The report concluded that, considering the mitigation measures, the proposed Scheme will have no appreciable adverse effect on the integrity of the Habitats Sites, either alone or in-combination with other projects.

1.3 Structure of this Report

This Planning Statement is submitted to accompany the planning application and is structured as follows:

- **Section 1** – introduces the application and provides background information for the Scheme;
- **Section 2** – provides a description of the application site and its surrounding area;
- **Section 3** – explains the Scheme and associated works;
- **Section 4** – sets out the pre-application advice received from BBNPA and Natural Resources Wales (NRW) relating to the Scheme;

- **Section 5** – sets out the relevant development plan policies, national planning policy and other material considerations;
- **Section 6** – assesses the relevant planning issues relating to the Scheme; and,
- **Section 7** – summaries key planning matters and other material considerations to the determination of the planning application.

1.4 Planning Application Submission

This Planning, Design and Access Statement forms part of a full planning application to BBNPA. This Statement should be read in conjunction with the other documents and drawings that form part of the pre-application submission, identified below in Table 1.1 and Table 1.2.

Table 1.1: Application Submissions Plans

Drawing	Reference
Site Boundary Plan	B17545-123532-14- XX-DR-CA-PN1205 P01
Proposed Works Site Layout	B17545-123532-12- XX-DR-CA-PN1201 P02
Proposed Cross Site Elevations	B17545-123532-12- XX-DR-CA-PN1202 P03
Enabling Works Layout Plan	B17545-123532-12- XX-DR-CA-PN1203 P02
Lighting Plan	B17545-123532-14-ZZ-DR-EA-PN1225 P01
Traffic Management Plan	B17545-123532-14-ZZ-DR-NA-EI1221 P02
Pollution Prevention Plan	B17545-123532-14-ZZ-DR-NA-EI1220 P01
Tree Constraints Plan	B17545-123532-14-XX-DR-NA-EI1206 P02
Tree Protection Plan	B17545-123532-14-XX-DR-NA-EI1207 P03
Landscape Proposal Plan	B17545-123532-14-XX-DR-NA-EI1222 P02
Landscape Sections	B17545-123532-14-ZZ-DR-NA-EI1224 P01

Table 1.2: Application Submission Documents

Document	Reference
Planning, Design and Access Statement	B17545-123532-14-XX-RP-NA-EI0079 P01
Heritage Desk Based Assessment	B17545-123532-14-XX-RP-NA-EI0063 P02
Preliminary Ecological Appraisal Report (PEAR)	B17545-126532-14-ZZ-AS-NA-EI0006 P03
Ecological Impact Assessment (EclA)	B17545-123532-14-XX-AS-NA-EI0083 P01
Bat Survey Report	B17545-123532-14-XX-AS-NA-EI0011 P02
Barn Owl Survey Report	B17545-123532-14-XX-RP-NA-EI0082 P01
Badger Survey Report	B17545-126532-14-XX-AS-NA-EI0050 P02
Hazel Dormouse Survey Report	B17545-126532-14-XX-AS-NA-EI0055 P02
Hedgerow Survey Report	B17545-126532-14-XX-AS-NA-EI0057 P02
Green Infrastructure Statement	B17545-123532-14-XX-BR-NA-EI0084 P01

Document	Reference
Landscape Ecological Management Plan (LEMP)	B17545-123532-14-XX-PR-NA-EI0085 P01
A Report to Inform Habitats Regulations Assessment (HRA)	B17545-123532-14-XX-DR-NA-EI1210 P02
Arboricultural Impact Assessment	B17545-123532-14-XX-RP-NA-EI0062 P02
Landscape and Visual Impact Assessment (LVIA)	B17545-123532-14-XX-RP-NA-EI0089 P02
Construction Traffic Management Plan (CTMP)	B17545-123532-14-XX-PR-NA-CJ0081 P01
Construction Environmental Management Plan (CEMP)	B17545-123532-14-XX-PR-NA-EI0086 P01
Drainage Statement	B17545-123532-14-XX-NN-CA-EI0093 P01

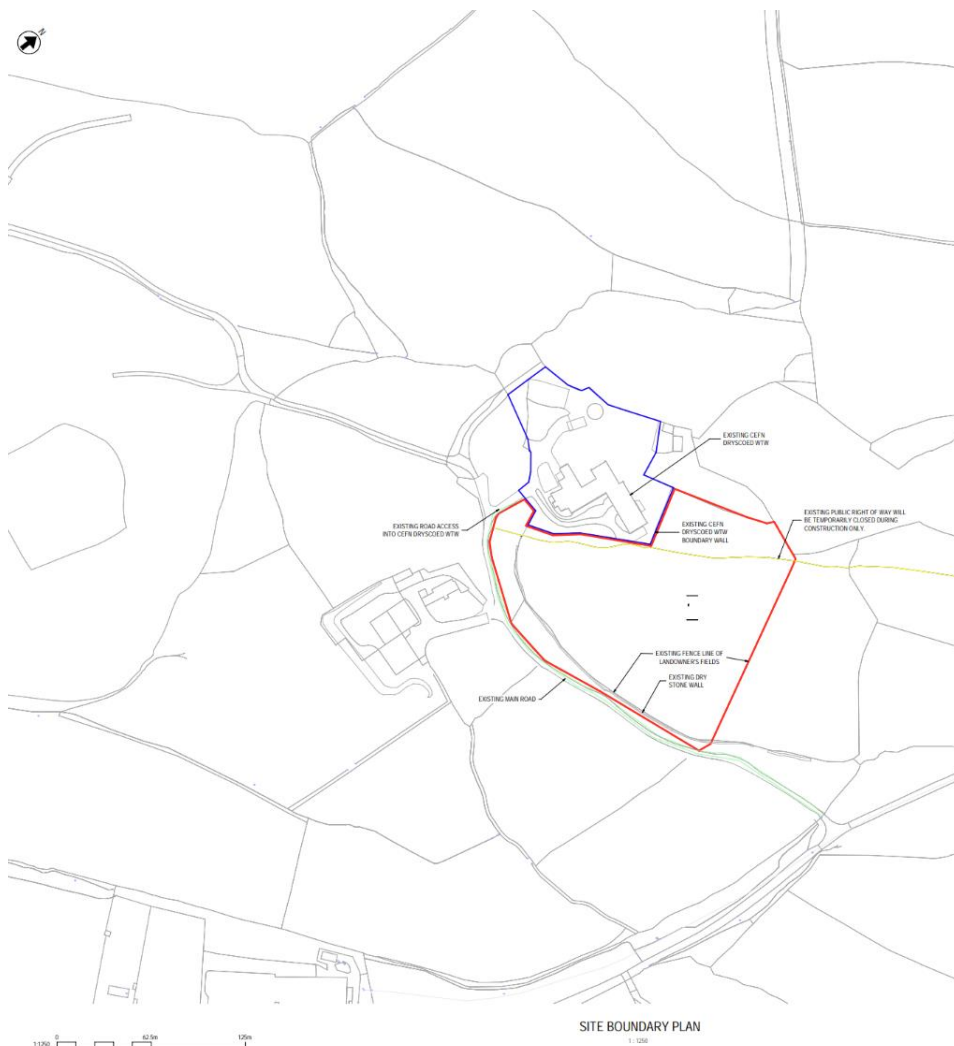
2 Site Context

2.1 Site Location and Description

Cefn Dryskoed Water Treatment Works (WTW) is located in a rural setting in the Bannau Brycheiniog National Park, to the north of Pontneddfechan, Neath (National Grid Reference SN 9089 0943). The site is shown edged in red on the submitted Site Boundary Plan (Drawing Reference: B17545-123532-14- XX-DR-CA-PN1205), an extract of which can be seen in Figure 2.1 below. The red line shows the planning application boundary, with the blue line showing land in DCWW's ownership. Existing PRoWs are also marked on the Site Boundary Plan.

The application site is located entirely within BBNPA's administrative area. The existing WTW site is located within the Bannau Brycheiniog National Park and consists of a collection of stone buildings built to resemble a farmstead. The site is immediately surrounded by pasture fields and hedgerows, with a parcel of ancient woodland to the north and moorland to the northeast.

Figure 2.1: Site Boundary Plan



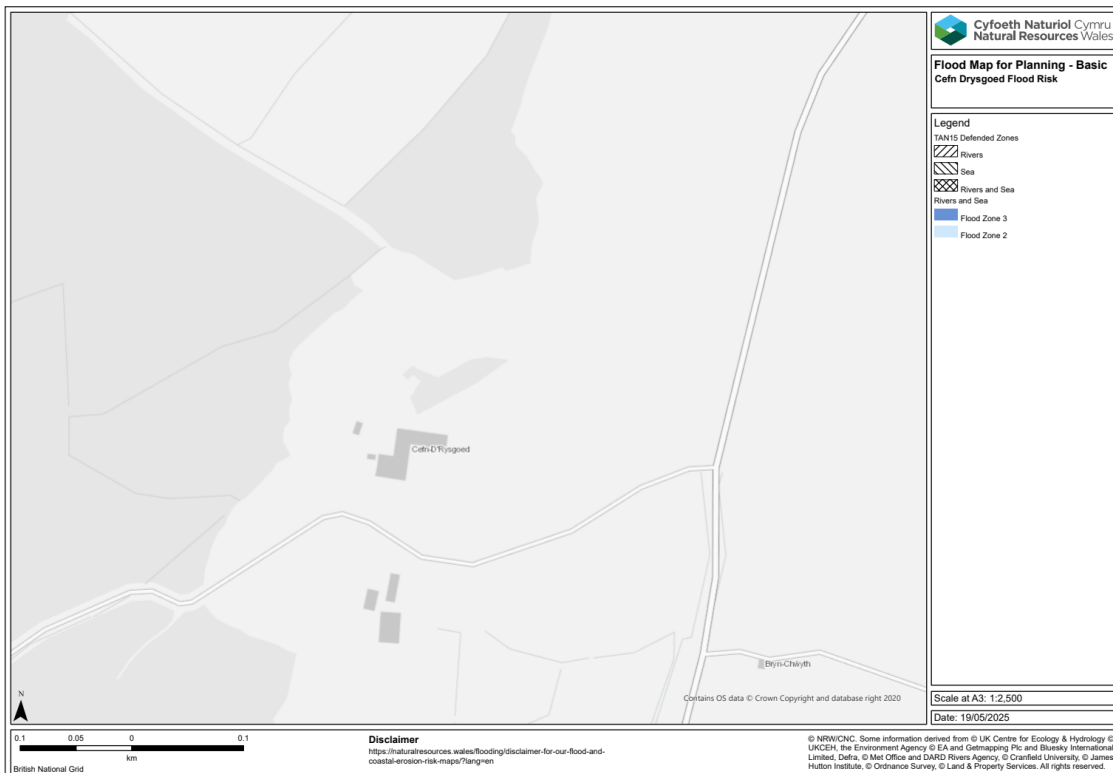
Source: Mott MacDonald Bentley (2025)

2.2 Environmental Context and Consideration

2.2.1 Flood Risk

The Development Advice Flood Map confirms that the application site is located in Flood Zone 1, signifying a low probability of flooding as shown in Figure 2.1 below. Flood Zone 1 means that there is a less than 1 in 1000 (0.1%) (plus climate change) chance of flooding on the site in a given year.

Figure 2.2: Development Advice Flood Map



Source: NRW (2025)

A Flood Consequences Assessment (FCA) is not required where the site falls into Flood Zone 1 and, therefore, an FCA has not been produced to support this planning application.

2.2.2 Heritage

There are no designated heritage assets within the red line boundary of the proposed development. However, there are a number of designated heritage assets in the vicinity of the application site. This includes:

- Pont Melin-fach, a Grade II listed building dating to the 19th century, 1.1km north of the application site (Cadw: PRM85436).
- Dinas Silica Mine, a scheduled monument, dating to the 19th century, 1.5m south east of the application site (Cadw:BR229).
- Craig y Ddinas Hillfort, a scheduled monument, dating to the Iron Age, 1.4km south east of the application site (Cadw:BR178).

- Glynneath Gunpowder Works, a scheduled monument, dating to the 19th century, 1.3km south east of the study area (Cadw:BR230).

There are also no non-designated heritage assets within the application site, although there are 27 non-designated historic assets located within 750m of the application site. 20 of these are post medieval farm buildings. The following non-designated heritage assets are considered most relevant to the proposed development due to their proximity to the application site:

- The post medieval farm buildings now integrated into Cefn Dryskoed WTW, 100m west of the application site (HER: 67515, 172819, 172819).
- The post medieval farm buildings at Gwern-bleiddgi farm, 150m south west of the application site (HER: 67516, 172815, 172816, 172817).

2.2.3 Ecology

Five statutory designated sites were identified within 2.0km of the application site. This includes one Special Area of Conservation (SAC), Coedydd Nedd a Mellte, which lies 0.47km to the west of the site. The remaining statutory designated sites within 2.0km of the proposed development consist of four Sites of Special Scientific Interest (SSSI), which are as follows:

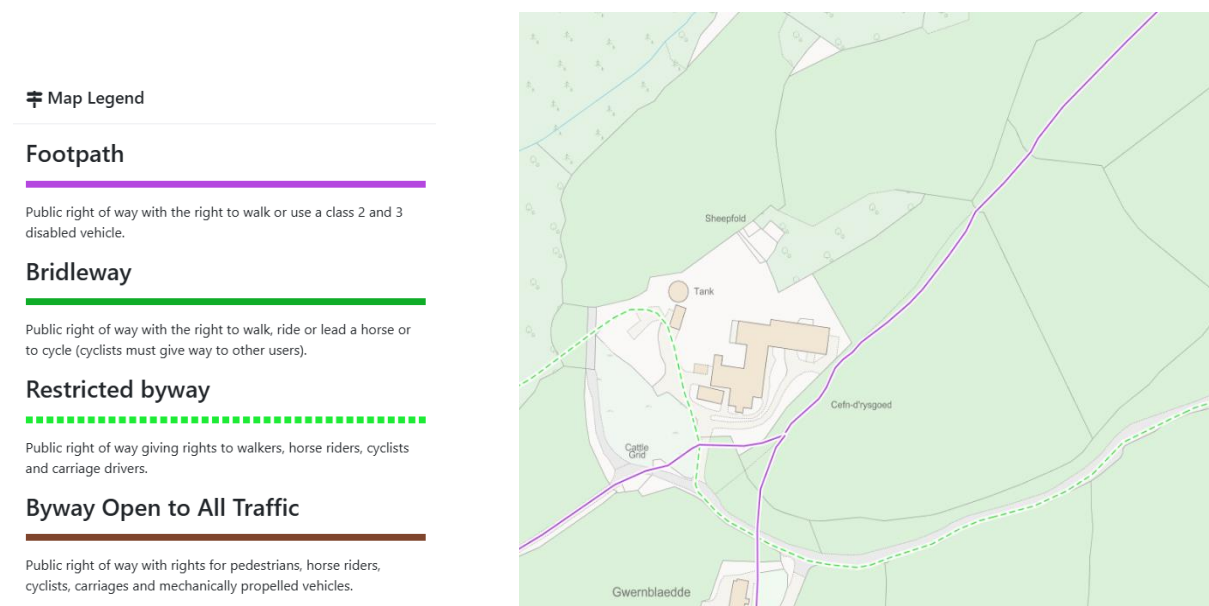
- Dyffrynoedd Nedd a Mellte a Moel Penderyn – located 0.26km to the north west of the application site;
- Caeau Nant y Llechau – located 0.74km to the north west of the application site;
- Bryn-bwch – located 1.1km to the north east of the application site; and
- Gweunydd Dyffryn Need – located 1.2km to the north of the application site.

No non-statutory designated sites were identified within 2.0km of the proposed development.

2.2.4 Transport

Two Public Rights of Way (PRoW): Footpath 41/17/1 and 41/43/1 fall within in the site boundary, as viewed below in Figure 2.3.

Figure 2.3: Rights of Way Map



Source: BBNPA (2025)

An additional PRow, restricted byway 41/83/4, is located adjacent to the site boundary.

The site is currently accessed from Ystradfellte Road.

2.3 Site Planning History

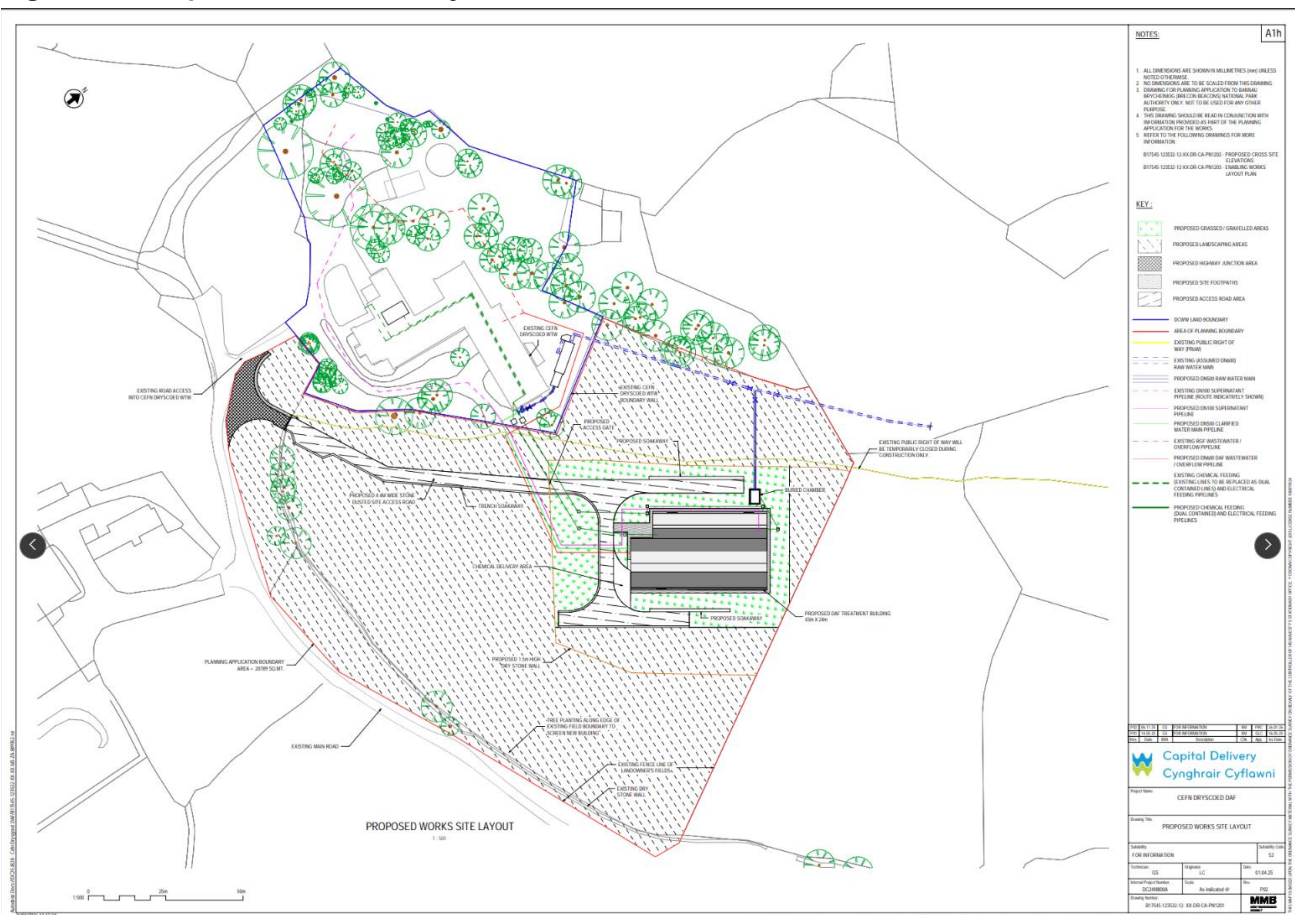
As of 18th December 2025, there have been no relevant planning applications within 500m of the site within the past 3 years. As such, there is no committed development or extant permissions that would impact on the application site.

3 Proposed Scheme

3.1 Overview

This Planning, Design and Access Statement forms part of an application that is seeking full planning permission for the construction of a DAF building and associated works at Cefn Dryskoed WTW. Figure 3.1 contains an extract of the Proposed Site Layout Plan (Drawing Reference: B17545-123532-12- XX-DR-CA-PN1201), which has been submitted as part of the application.

Figure 3.1: Proposed Works Site Layout Plan



Source: Mott MacDonald Bentley (2026)

The proposed Scheme consists of the following:

- The construction of a new DAF building (43m x 24m, with a maximum height of 12.75m), including the installation of three new DAF tanks and flocculators, and other processing and ancillary equipment within the new DAF building;
- Provision of a 1.5m high dry stone wall around the circumference of the new DAF building with new access gate;

- Installation of pipelines to connect the new DAF building to the existing WTW and to connect the existing raw water main to the DAF plant, including associated chambers and ducts for chemical dosing, and electrical cables. The pipelines will be installed by open-cut trenching with habitat mainly restored once complete;
- Installation of a new 4.4m wide macadam access track with stone dusted footpath to facilitate operational activities of the new DAF building;
- Fencing, drainage and other soft-landscaping;
- Installation of new electrical cabling, distribution boards, PLC and instrumentation (e.g. water quality and turbidity monitors);
- Installation of a new DAF Motor Control Centre (MCC) within the new building; and
- Temporary enabling works including construction of two construction compounds, a car park and an internal site road.

Further information regarding the design of the proposed Scheme including proposed materials is set out below in Section 6.4.

It is noted that new pumping equipment will be provided within the existing Cefn Dryskoed WTW to support this development. However, this will be carried out using DCWW's permitted development rights.

4 Pre-application Advice

4.1 Summary of Pre-application Advice from BBNPA

4.1.1 Overview

A request for pre-application advice was submitted to the BBNPA in June 2025 and a subsequent meeting held with the case officer in August. The Council responded in writing by letter dated 24 October 2025 (ref. 25/23894/PAYPRE). Table 4.1 below provides an overview of the pre-application advice received and how this been fed into the Scheme design:

Table 4.1: Pre-app advice received and response

Pre-app advice received	Response
The principle of development was accepted. However further justification was requested in terms of the proposed siting of the building.	The siting of the building within the application site is necessitated by operational and topographical requirements. Further information regarding this has been provided within Section 6.3 of this Statement.
It was acknowledged that the building is large (40m x 28m with a roof pitch of 13.5m) and further justification regarding the proposed building height was requested.	<p>The proposed building height has been reduced from the design presented at pre-app, particularly in the 'lean to' element of the Scheme design which was been reduced by approximately 4.5m in height. However, the height proposed through this application is necessitated by operational requirements driven by minimum maintenance clearances for the required equipment. Further justification setting out the operational requirements is provided in Section 6.4 of this Statement.</p> <p>Section 6.4 also sets out how the massing has been broken down through the addition of the 'lean to' elements and the materials selected to minimise any impacts of the proposed building height. A Landscape and Visual Impact Assessment (LVIA) (Document Reference: B17545-123532-14-XX-RP-NA-EI0089) has also been provided to support this planning application which demonstrates how appropriate mitigation measures ensures the proposed building will not cause adverse effects on sensitive receptors and the rural character of the National Park.</p>
The scope of surveys was considered acceptable. It was noted that any changes to tree removals should be provided within the Arboricultural Impact Assessment and Ecological Impact Assessment (EclA) and compensatory planting provided at a 3:1 ratio.	Noted. The Arboricultural Impact Assessment and EclA are up to date. Only one hedgerow is proposed to be removed, which is addressed within Section 6.6.1 of this Statement.
Due to the confirmed bat roosts and breeding barn owls within the existing WTW site, an External Lighting Plan was requested to support a future planning application on the site.	A Lighting Plan has now been provided to support this application. Please refer to drawing reference: B17545-123532-14-ZZ-DR-CA-CI1003.
It was noted that there is a designated ancient woodland situated to the NE of the site and opportunities to improves the site's connectivity here would be welcomed.	In accordance with the stepwise approach set out in Section 6 of Planning Policy Wales (PPW) 12, compensatory planting is needed to mitigate the loss of the hedgerow. However, compensatory planting on site has

Pre-app advice received

Response

	<p>been proposed ahead of compensatory planting off site. The proposed compensatory planting, including orchard, native tree and hedgerow planting are illustrated on the Landscape Proposal Plan (Drawing Reference: B17545-123532-14-XX-DR-NA-EI1222).</p>
<p>A Landscape and Ecological Enhancement and Management Plan was requested to tie together landscaping and biodiversity enhancements, as well as to secure their long-term management.</p>	<p>Additional information regarding landscaping and biodiversity enhancements has been provided to support this planning application. Please refer to:</p> <ul style="list-style-type: none"> ● Landscape Ecological Management Plan (LEMP) (Document Reference: B17545-123532-14-XX-PR-NA-EI0085) ● Green Infrastructure Statement (Document Reference: B17545-123532-14-XX-BR-NA-EI0084) ● Landscape Proposal Plan (Drawing Reference: B17545-123532-14-XX-DR-NA-EI1222) ● Landscape Sections (Drawing Reference: B17545-123532-14-ZZ-DR-NA-EI1224) <p>The 30 year management plan for the proposed biodiversity and landscaping measures are set out in the LEMP.</p>
<p>Further information was requested in relation to the temporary buried service line shown on the Enabling Works Layout Plan, running north to the existing building to demonstrate whether this is a new engineering operation proposed or an existing pipeline.</p>	<p>Removed from Plan as existing pipeline is not related to the proposed Scheme</p>
<p>It was requested that tree protection measures are added to trees G8 and W2 including Root Protection Areas (RPAs) and protective fencing locations</p>	<p>Trees W2 and G8 are not in conflict with the proposed works. However, they will be protected with temporary barriers in accordance with BS5837:2012. This is set out in the Arboricultural Impact Assessment.</p>
<p>In terms of heritage, it was noted that the application has the potential to impact on the setting of non-designated heritage assets, namely the post-medieval farm buildings at Cefn Dryskoed. However, it was acknowledged that the scale of the building has been mitigated through the design and materials used. It was further requested the Heritage Desk Based Assessment (DBA) be provided to support a planning application on the site.</p>	<p>Noted. The DBA has been provided to support this application, please refer to document reference: B17545-123532-14-XX-RP-NA-EI0063.</p>
<p>In terms of Transport, BBNPA did not consult the Highways Authority as part of the request for pre-application advice. Engagement with the PROW Officer was advised.</p>	<p>Noted. Correspondence via email was undertaken with the PROW Officer in terms of the temporary stopping up of the PROWs. Further information about this engagement is set out in Section 6.8.2 of this Statement.</p>
<p>It is also noted that a location map of proposed visual receptors to be assessed through a the LVIA was provided to support the request for pre-application advice. No comments were received on the proposed receptors from BBNPA, and no additional viewpoints were requested to be assessed as part of the LVIA.</p>	<p>Due to the lack of comments on proposed receptors and viewpoints, Mott MacDonald have assessed 12 representative viewpoints including five wireframes from sensitive receptors within the LVIA.</p>

4.2 Discretionary Advice from Natural Resources Wales

As BBNPA does not currently have a landscape officer, discretionary advice was sought from Natural Resources Wales (NRW) in October 2025. A summary of the advice provided can be found below:

Table 4.2: Discretionary advice received from NRW and response

Discretionary advice received from NRW Response

<p>Further information about the functional requirements was requested to better understand the context/reasoning for the proposed scale and massing. It was also asked if DCWW could explore if the tallest necessary height is required across the entire footprint of the building or not.</p>	<p>The building height proposed through this application is necessitated by operational requirements driven by minimum maintenance clearances for the required equipment. Further detail on these specific operational requirements and the minimum building height needed have been provided in Section 6.4 of this Statement.</p> <p>It should be added that the building height has been reduced since the iteration of the design put forward as part of the request for discretionary advice. The 'lean-to' element has been added as to reduce the maximum height being used across the footprint of the building following this advice.</p>
<p>The stonework finishes and pitched slate tile roofing were considered an appropriate response to the rural setting. However, further analysis of building materials was requested to support a planning submission on the site.</p>	<p>Noted. Further information regarding building materials, including indicative visualisations of how the building could look has been provided in Section 6.4 of the document.</p>
<p>It was stated that the Planning, Design and Access Statement should justify the proposed siting of the DAF building, including why it was not sited next to the existing WTW.</p>	<p>The siting of the building within the application site is necessitated by operational and topographical requirements. Further information regarding this has been provided within Section 6.3 of this Statement.</p>
<p>NRW recommended separating the PRoW from the access road to limit the more urban influence of the development. They also requested Mott MacDonald explore reducing the width of the access road and consider alternative surfacing treatments for the access road with a preference for treatments sympathetic to the rural location e.g. aggregate track</p>	<p>The width of the access road has been reduced from 6m to 4.4m and the material amended from macadam to stone dusting following the receipt of NRW's advice in order to reduce the urban influence of the development and ensure the development remains sympathetic to the rural character of the area.</p>
<p>Insufficient information was provided for NRW to comment on the proposed viewpoints to be taken forward in an LVIA, owing to the early stage of design and assessment.</p>	<p>Noted. 12 representative viewpoints including five wireframes from sensitive receptors were assessed within the LVIA.</p>

5 Planning Policy Context

5.1 National Planning Policy

5.1.1 PPW (Edition 12)

PPW was published in 2018 and was most recently amended in February 2024. It sets out the overarching policy for planning and planning related decision-making in Wales. Planning legislation requires that applications for planning permission are determined in accordance with the development plan unless material considerations indicate otherwise. PPW 12 must therefore be taken into account in preparing the development plan and is a material consideration in planning decisions.

Table 5.1 below outlines the policies from PPW 12 relevant to the proposal:

Table 5.1: PPW 12 Policies List

Policy	Description
2.3 People and Places: Achieving Well-being Through Placemaking	The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and wellbeing, creating prosperity for all.
3.3 Good Design Making Better Places	Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.
3.60 Development in the Countryside	Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, however, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.
3.61-3.63 Supporting Infrastructure	Adequate and efficient infrastructure is crucial for economic, social and environmental sustainability. Development should be located so that it can be well serviced by existing or planned infrastructure. In general this will involve maximising the use of existing infrastructure.
4.1.39 Traffic Management	Design and Access Statements should demonstrate how the design and layout of the development will reduce the level and speed of traffic to appropriate levels.
6.1.5 Conserving and Enhancing the Historic Environment and Its Assets	The planning system must take into account the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations.
6.3.10 National Parks and Areas of Outstanding National Beauty	In National Parks or AONBs, special considerations apply to major development proposals. Major developments should not take place in National Parks or AONBs except in exceptional circumstances. This may arise where, after rigorous examination, there is demonstrated to be an overriding public need, refusal would be severely detrimental to the local economy and there is no potential for locating the development elsewhere or meeting the need in some other way. Any construction and restoration must be carried out to high environmental standards.

Policy	Description
	<p>Consideration of applications for major developments should therefore include an assessment of:</p> <ul style="list-style-type: none"> the need for the development, in terms of national considerations and the impact of permitting it or refusing it upon the local economy; the cost of and scope for providing the development outside the designated area or meeting the need for it in some other way; and any detrimental effect on the environment and the landscape, and the extent to which that could be moderated and/or mitigated.
<p>6.4 Biodiversity and Ecological Networks</p>	<p>Development should not cause any significant loss of habitats or populations of species (not including non native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site.</p> <p>Planning authorities must follow a step- wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.</p>
<p>6.4.42 Trees, Woodland and Hedgerow</p>	<p>Permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Where individual or groups of trees and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach as set out in paragraph 6.4.15. Where loss is unavoidable developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green value including biodiversity, landscape value and carbon capture). Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost.</p>
<p>6.6.18 Sustainable Drainage Systems (SuDS) and Development</p>	<p>The provision of sustainable drainage systems (SuDS) must be considered as an integral part of the design of new development and considered at the earliest possible stage when formulating proposals for new development.</p>
<p>6.7.26 Managing Potential Environmental Risk Arising through Construction Phases</p>	<p>Planning authorities must consider the potential for temporary environmental risks, including airborne pollution and surface and subsurface risks, arising during the construction phases of development. Where appropriate planning authorities should require a construction management plan, covering pollution prevention, noisy plant, hours of operation, dust mitigation and details for keeping residents informed about temporary risks.</p>

5.1.2 Future Wales: The National Plan 2040

The Future Wales: The National Plan 2040 sets out the Welsh government’s framework, ‘setting the direction for development in Wales to 2040’. Outlined below are the relevant policies to the development:

Table 5.2: Future Wales Policies List

Policy	Description
Policy 9 - Resilient Ecological Networks and Green Infrastructure	Action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment

5.1.3 Technical Advisory Notes

The following Technical Advisory Notes are of relevance to the proposed development:

- Technical advice note (TAN) 5: nature conservation and planning
- Technical advice note (TAN) 12: design
- Technical advice note (TAN) 15: development, flooding and coastal erosion
- Technical advice note (TAN) 24: the historic environment

5.1.4 Other legislation

Other legislation relevant to the Scheme is set out below:

- Historic Environment Wales Act (2023)
- Environment (Wales) Act (2016)
- Well-being of Future Generations (Wales) Act (2015)

5.2 Local Planning Documents

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that proposals are determined in accordance with the development plan unless material considerations indicate otherwise.

The site falls within the administrative boundary of Bannau Brycheiniog National Park Authority and the statutory development plan, relevant to this proposal, comprises:

- Bannau Brycheiniog National Park Authority Local Development Plan 2007-2022
- Proposals Map

The Local Planning Authority has confirmed that progress of Local Development Plan (LDP) 2 is currently on pause as a result of the phosphate constraint. Following confirmation from Welsh Government the adopted Local Development Plan (2007-2022) remains in place and material.

5.2.1 Bannau Brycheiniog National Park Authority Local Development Plan (LDP) 2007-2022

The Local Development Plan (LDP) policies highlighted in Table 5.3 are considered to be of most relevance to the proposed development.

Table 5.3: BBNPA LDP Policies

Policy	Description
SP1 National Park Policy	<p>Development in the National Park will be required to comply with the purposes and statutory duty set out in legislation, and will be permitted where it:</p> <ul style="list-style-type: none"> a) conserves and enhances the Natural Beauty, wildlife and cultural heritage of the Park; and/or b) provides for, or supports, the understanding and enjoyment of the special qualities of the National Park in a way that does not harm those qualities; and c) fulfils the two purposes above and assists the economic and social well-being of local communities.
Policy I Appropriate Development in the National Park	<p>All proposals for development or change of use of land or buildings in the National Park must comply with the following criteria, where they are relevant to the proposal:</p> <ul style="list-style-type: none"> i) the scale, form, design, layout, density, intensity of use and use of materials will be appropriate to the surroundings and will maintain or enhance the quality and character of the Park’s Natural Beauty, wildlife, cultural heritage and built environment; ii) the proposed development is integrated into the landscape to the satisfaction of the NPA through planting and appropriate management of native species or through the construction of appropriate boundary features; iii) the proposed development does not have an unacceptable impact on the economic, social, cultural and linguistic vitality and identity of any community, either in its own right or through cumulative impact. iv) the proposed development promotes opportunities for the conservation and enhancement of bio/geodiversity through appropriate design and landscaping. v) the proposed development is within 400m of an area of accessible natural green-space.
SP2 Major Development in the National Park – Strategic Policy	<p>Major development in the National Park should only take place in exceptional circumstances where proven to be in the public interest and will include an assessment of:</p> <ul style="list-style-type: none"> a) the need for the development, including any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which these could be moderated.
SP3 Environmental Protection – Strategic Policy	<p>All proposals for development or change of use of land or buildings in the National Park must demonstrate that the proposed development does not have an unacceptable impact on, nor detract from, or prevent the enjoyment of;</p> <ul style="list-style-type: none"> a) the special qualities of the National Park as identified in the National Park Management Plan b) ecology and biodiversity assets both within and beyond designated sites c) the water environment d) geodiversity e) cultural and historic heritage f) the character of the built heritage, including listed buildings, conservation areas and archaeological g) the important network of public open space and recreation facilities

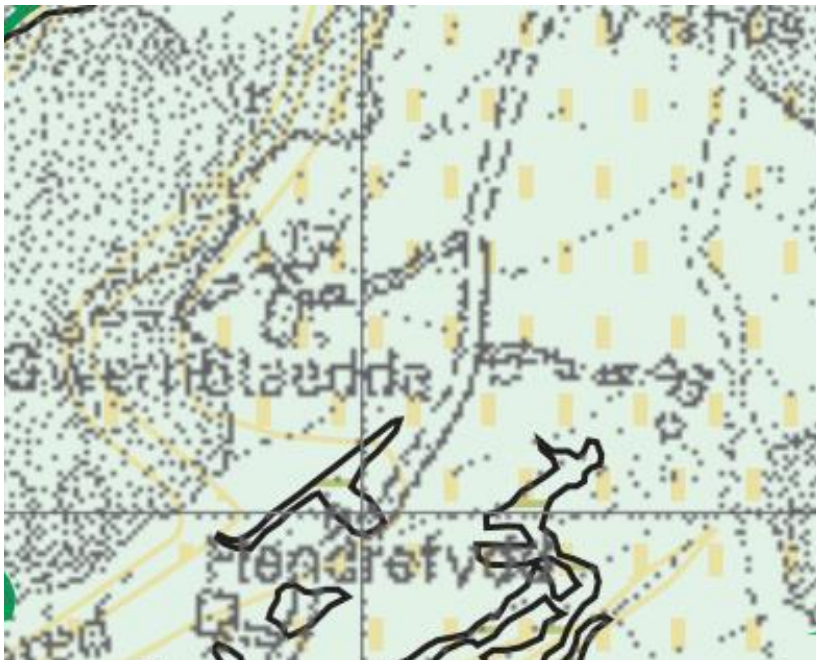
Policy	Description
	<ul style="list-style-type: none"> h) soil and air quality i) Agricultural Land of Grade 1,2,3a
<p>Policy 6 Biodiversity</p>	<p>Development will only be permitted where;</p> <ol style="list-style-type: none"> 1. the developer proves to the satisfaction of the NPA that there is no unacceptable loss or fragmentation or other impact of a habitat or landscape feature and/or increased isolation on important species as listed under Section 42 of the NERC act (habitats and species of principal importance to Wales), OR 2. <ol style="list-style-type: none"> a) the developer identifies habitats and landscape features of importance for wildlife within the site and provides for the further creation, positive management, restoration, enhancement or compensation for these habitats and features to ensure that the site maintains its nature conservation importance; and b) full provision is made for the future management of the site's habitats and features of nature conservation value. This will be secured either through Planning Obligations or the imposition of Planning Conditions; and c) there is no unacceptable loss/breaching of linear features (e.g. hedgerows, woodland belts). Development should seek to enhance linear habitat features (e.g. hedgerow, woodland belts) 'dark corridors' and roosts used by bats <p>The NPA will require all development being judged against this policy to provide biodiversity enhancement through the scheme in accordance with the direction of the Planning Obligation Strategy.</p>
<p>Policy 8 Trees and Development</p>	<p>Proposals for development on sites containing trees will be required to provide a Tree Survey and a Tree Protection Plan in support of the proposal. Permission will be granted where the NPA is satisfied that:</p> <ol style="list-style-type: none"> a) Trees and their root systems (including associated soil) are retained and adequately protected prior to, during and after development; and/or b) Where the NPA agrees to the removal of trees as part of the development scheme, appropriate replacement must be provided on site utilising native trees of local provenance. A scheme for tree replacement, including details of planting and aftercare, shall be agreed with the NPA prior to the commencement of development.
<p>Policy 12 Light Pollution</p>	<p>Proposals where lighting is required shall include a full lighting scheme and will be permitted:</p> <ol style="list-style-type: none"> a) where the lighting proposed is appropriate to its purpose; and, b) where there is not a significant adverse effect individually or cumulatively on: <ol style="list-style-type: none"> i) the character of the area; ii) local residents; iii) vehicle users; iv) pedestrians; v) biodiversity; vi) the visibility of the night sky; and vii) 'dark corridors' for bats and light sensitive species
<p>Policy 14 Air Quality</p>	<p>Proposals for development will only be permitted where it is proven that no detrimental impact, individually or cumulatively will be had on air quality. Proposals for development which are likely to impact negatively on air quality or are potentially polluting will not be permitted unless mitigation measures to avoid the impact are provided.</p>

Policy	Description
CYD LPI Enabling Appropriate Development	<p>Proposals for development within countryside locations will be required to contribute positively to their countryside setting and enhance the quality of the landscape without adverse impact on the wildlife, natural beauty, cultural heritage, environmental assets or biodiversity of the area.</p> <p>All proposals for development within countryside locations must demonstrate how they respond to the identified issues set out at 4.9.2 and how the scheme will contribute to achieving the Countryside 15 year Future Vision.</p> <p>Outside of defined settlements within the LDP the following forms of development will be: permitted subject to all other relevant LDP Policies:-</p> <ol style="list-style-type: none"> Proposals that capitalise on improving the existing building stock and/or utilises previously developed land and/or re-uses redundant buildings...
Policy 49 Rights of Way and Long Distance Routes	<p>Development that would prevent or adversely affect the use of a public right of way; or a route with potential to form a long-distance walking, riding or cycling path; or a Promoted Path will only be permitted where an equivalent alternative route can be provided.</p>

5.2.2 Proposals Map

A review of the BBNPA LDP Proposals Map has been undertaken. An excerpt of the Proposals Map can be viewed below in Figure 5.1, which shows that there are no relevant LDP designations that impact the site

Figure 5.1: Proposals Map Excerpt



Source: Bannau Brycheiniog National Park Authority (2007)

6 Planning Assessment

6.1 Introduction

The following section outlines the key planning issues considered as part of this application and provides analysis of how they are addressed in accordance with the development plan and the below material considerations:

- Principle of Development;
- Location of Development;
- Design;
- Landscape;
- Ecology;
- Heritage;
- Transport and Access;
- Drainage; and
- Pollution and Amenity.

6.2 Principle of Development

There are no policies in PPW12, Future Plan Wales or the BBNPA LDP that relate specifically to water treatment works. However, Para 3.61 of PPW 12 emphasises the importance of adequate and efficient infrastructure provision for economic, social and environmental sustainability.

There is no dedicated manganese removal process at Cefn Dryskoed WTW. In July 2022 there was a discolouration event caused by the presence of elevated levels of manganese that led to customer complaints due to worsening of water quality. There is a potential for elevated levels of manganese due to its presence in the raw water, supplied by Ystradfellte Reservoir. Therefore, the DAF building is required in order to deliver a permanent dedicated manganese removal stage at the front end of the treatment process to achieve DCWW's target of less than 2µg/l manganese for the health and safety of customers.

Accordingly, the proposed Scheme is required to reduce manganese levels to satisfy a public need for better quality of drinking water. The principle of development is therefore supported by PPW 12 as the development is required to ensure the provision of adequate infrastructure.

6.3 Location of Development

Paragraph 3.60 of PPW 12 seeks to steer new development from the open countryside away from existing settlements. PPW 12 Para 6.3.10 further adds that major developments should not take place in National Parks except in exceptional circumstances such as where there is an overriding public need, refusal would be severely detrimental to the local economy and there is no potential for locating the development elsewhere or meeting the need in some other way.

With respect to the site being within the National Park, BBNPA LDP Policy SP1 seeks to ensure that new development conserves and enhances its natural beauty, wildlife and cultural heritage and provides for, or supports, the understanding and enjoyment of its special qualities in a way that does not harm those qualities and assists the economic and social well-being of local communities. LDP Policy SP2 further states that major development in the National Park should

only take place in exceptional circumstances where proven to be in the public interest and should include an assessment of:

- the need for the development, including any national considerations, and the impact of permitting it, or refusing it, upon the local economy.
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which these could be moderated.

As noted above, the Scheme proposed in Section 3 of this Statement is intended to be located within the National Park on an existing WTW site in a rural setting. At pre-application stage, BBNPA and NRW requested further justification pertaining to the proposed siting of the DAF building. In this context, the following engineering requirements necessitate the location of the proposed DAF building to be in close proximity to the existing WTW, as well as for operational efficiency and sustainability:

- Operational staff will require access to the DAF building in the fastest time possible should there be any urgent issues that could result in the halting of any processes within the WTW. The DAF plant therefore needs to be as close as possible to the existing WTW to minimise the distance travelled by operational staff in case of emergency.
- Locating the DAF plant across more than one field would result in there being two different operational sites. This would cause a series of operational challenges which could lead to the site being operated less efficiently, as well as risking increasing vehicular journeys between two sites.
- The distance between the DAF plant and the existing Cefn Dryskoed WTW will inform the length of pipework and transfer lines. Shorter pipework and transfer lines will result in a reduction in pipework that needs to be operated and maintained, resulting in a more efficient and sustainable development.
- Similarly, the distance between the proposed DAF plant and the existing raw water inlet main will determine the length required for a new pipeline to supply the DAF plant, and therefore, the amount of pipework that needs to be operated and maintained.
- The further the DAF building is from the existing Cefn Dryskoed WTW, the longer the transfer lines (i.e. the lime, chlorine, ferric coagulant, supernatant return and sludge) will need to be. This would increase the risk of blockages that may occur due to the nature of the chemicals, which would impact the performance of the DAF plant. The longer the lengths of pipework between the existing and new site, and the greater difference in elevation, the larger that the pumps, and associated power demand will need to be, to supply the new site with supernatant, and other chemicals.

Alternative sites to house the DAF building were considered as part of optioneering undertaken at the outset of the design process. However, the proposed siting of the building is the only location at an elevation higher than the existing WTW to facilitate the flow of water between buildings. Other positions in the field sit at a lower elevation than the existing Cefn Dryskoed WTW and would therefore require interstage pumping between the existing WTW and the proposed DAF plant in order to operate. The use of interstage pumping can impact the water quality due to how flocculant reacts to being pumped. If the flocculant is damaged during the interstage pumping, the impact on water quality may consist of an increase in turbidity, a risk of not removing residual metals, and negatively impacting the disinfection process. Issues with the water quality would result in additional operational mitigation to resolve. Therefore, the siting of the proposed DAF building has been dictated by offering offers sufficiently high ground within the site to ensure sufficient head for the water to flow from the DAF plant to Cefn Dryskoed utilising gravity, thus reducing the need for interstage pumping.

On this basis, it is considered that the proposed Scheme accords with PPW 12 and LDP Policy SP2 as the need to enhance the function of the existing WTW site acts as the exceptional circumstance to justify the location of the proposed development within a rural setting within the National Park. As set out above, the location has been selected to be located as close as possible to the existing WTW for enhanced operation, while being on a high enough elevation to reduce the need for interstage pumping. The sensitivity of the site's location in a rural setting in the National Park is recognised and has resulted in a design that seeks to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park, in order to accord with LDP Policy SP1. Further information regarding how the Scheme meets these objectives is set out throughout Section 6 of this Statement as part of the wider planning assessment.

6.4 Design

The importance of design quality is emphasised throughout PPW 12, and on this subject Paragraph 3.3 specifically states that 'Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places'.

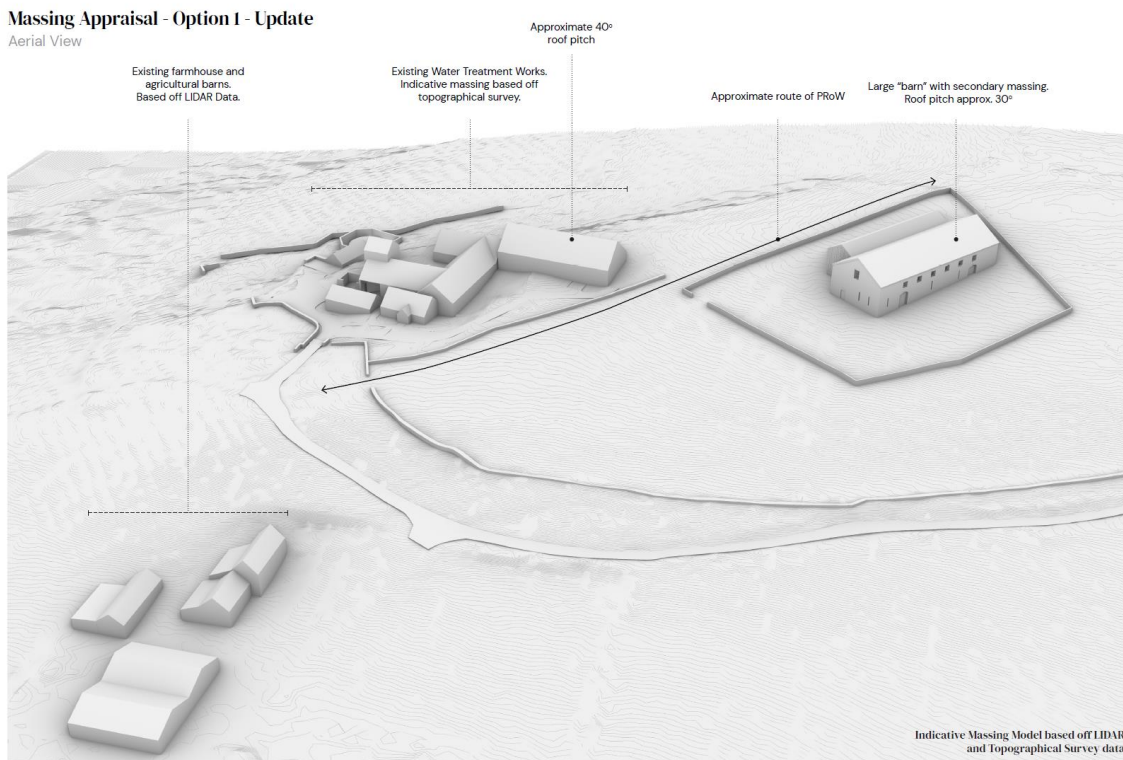
BBNPA LDP Policy I seeks to ensure that the scale, form, design, layout, density, intensity of use and use of materials will be appropriate to the surroundings and will maintain or enhance the quality and character of the Park's Natural Beauty, wildlife, cultural heritage and built environment.

At pre-application stage, both BBNPA and NRW requested further information in relation to any operational requirements which may inform the height, scale and massing, as well as additional information regarding the materials.

The Scheme's design has been informed by the site's sensitive location within the National Park and as such, the scale, form and layout has been designed to reflect the local context. The site is located within an area of rural tranquillity with a number of farmhouses and agricultural buildings scattered across the landscape. The local farmhouses, barns and agricultural buildings are largely constructed from stone with a double-pitched slate roof. The existing WTW was also designed to assimilate into the setting of the local area on this basis.

Different design options were reviewed as part of the Scheme's development. However, Figure 6.1 below illustrates how the local vernacular has a unified building form. Building designs with tiered massing and multiple stepped height variations were considered, but ultimately it was decided that they appeared increasingly contrary to the local context and dominated the landscape. As such, the building proposed as part of this submission has a pitched roof of 30 degrees to reflect other farmhouse buildings in the local area, with a secondary adjoining 'lean to' element also with a pitched roof to further break up the massing.

Figure 6.1: CGI aerial view of Proposed Development and its setting



Source: Kendall Kingscott (2026)

It is acknowledged the Proposed Development is taller in height than other buildings in the vicinity at a maximum height of 12.75m. This is because operationally, the building has minimum height requirements, set by:

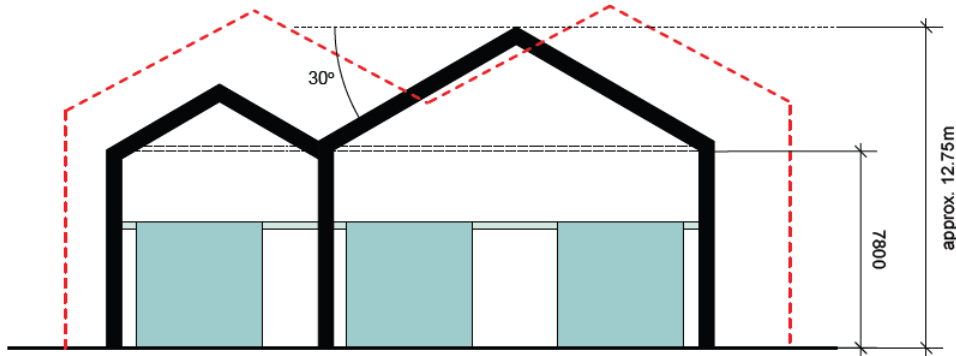
- The height of the flocculator tank plus mechanical and standing clearance requirements;
- The height of the DAF tank plus mechanical clearance requirements;
- The clearance required from the high level platform;
- The height of the office and motor control cabinet room; and
- The height of the caustic tank and platform plus standing clearance requirements.

The minimum height requirements further made a tiered massing solution complex to deliver.

It should be noted however, that the building height proposed as part of this submission has been reduced from the design presented to BBNPA at pre-application stage. This is depicted below in Figure 6.2, an indicative section sketch of the proposed DAF building where the dashed red line illustrates the design presented at pre-app. Figure 6.2 illustrates the reduction in height, particularly in the 'lean to' element of the scheme, which has been reduced by approximately 4.5m in height. This design change was undertaken as a result of pre-app feedback received and confirmation of the required maintenance clearance as the detail design progressed.

Figure 6.2: Indicative section sketch of DAF building

Indicative Section
1:200 @ A3

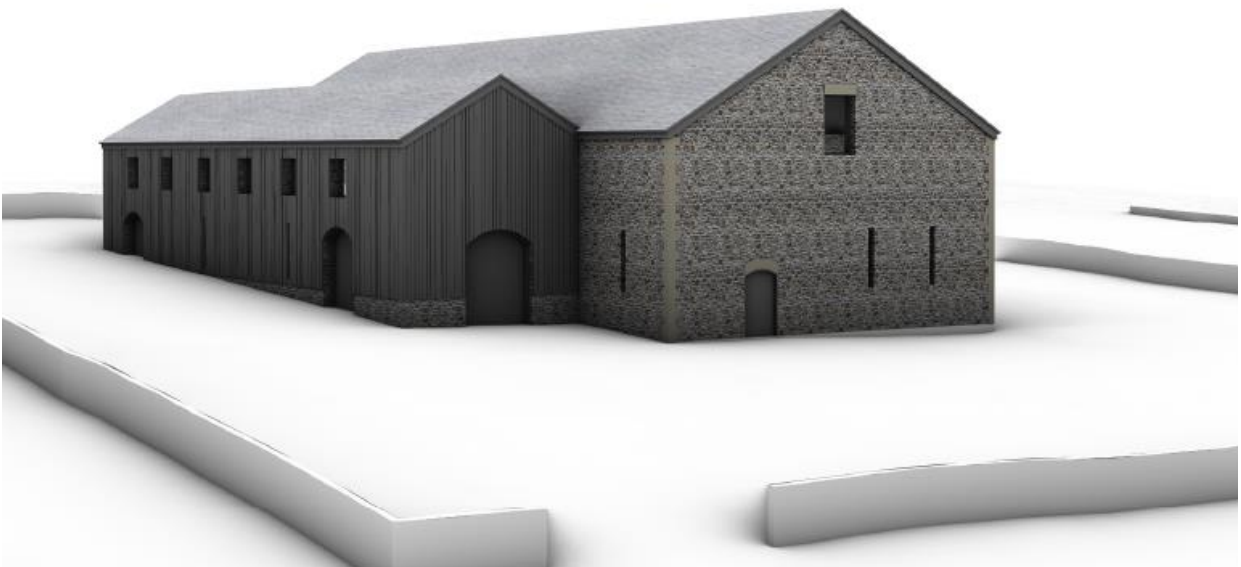


Source: Kendall Kingscott (2026)

Care has been taken to screen the building, to minimise any negligible impacts on the rural character of the area and mitigate concerns regarding the buildings height. This has been assessed as part of an LVIA (Document Reference: B17545-123532-14-XX-RP-NA-EI0089), the findings of which are discussed at length in Section 6.4 of this Statement.

To further help break down the massing and adopt the surrounding character, the 'lean to' element has been added, which also seeks to create visual interest. The different materials used for the 'lean to' element also help to achieve this purpose.

Figure 6.3: Computer Generated Image of DAF Building



Source: Kendall Kingscott (2026)

All of the proposed materials have been selected in order to reflect the rural vernacular and to blend in with the material palette used on other buildings in the vicinity. For instance, the main element of the building is intended to be clad in natural stone, with the stonework illustrated being random-rubble bought to course with larger quoins to the building edges. The 'lean to' element will be clad in black stained timber. The roof is proposed to be covered in natural slate tiles and the gable ends of the roof will be faced with bargeboards to further enhance the external appearance of the building. The materials have drawn reference from other buildings in the area including the existing WTW and Gwern-bleiddgi farm and, further away, the Pontneddfechan Village Hall.

The appearance of the proposed building is illustrated above in Figure 6.3 through a computer generated image.

The boundary wall will also be clad in natural stone, to blend in with the proposed DAF building, and other farm boundary walls in the local area. In terms of the access road, the bell mouth will be tarmac but the access road itself stone dusted. This has been altered from the macadam surfacing proposed at pre-application stage at the request of NRW, who expressed concern about the urbanising influence this could have on the rural character of the area.

Therefore, it is considered that the Scheme design has been developed in compliance with PPW 12 and BBNPA LDP Policy I as each element of the design has been informed by the rural character of the area and the local building vernacular. Reference has been drawn from buildings in the vicinity, which has informed the approach to building form, massing and the materials selected. It is acknowledged the building is taller than other buildings nearby; however, it has been discussed how this is driven by operational requirements and that appropriate mitigation and screening has been provided.

6.5 Landscape

Section 6.3 of PPW 12 emphasises the importance of protecting and enhancing the landscape value of a site, with Paragraph 6.3.10 setting out that applications for major development in National Parks should assess if there would be any detrimental effect on the environment and the landscape, and the extent to which that could be moderated or mitigated.

BBNPA LDP Policy I further sets out that development in a National Park should be appropriate to its surroundings and maintain or enhance the quality and character of the Park's Natural Beauty, wildlife, cultural heritage and built environment. LDP Policy I also requires development to be integrated into the landscape.

The landscape character around the existing WTW is one of remoteness and rural tranquillity. The existing WTW is well-screened, sits comfortably within the landscape, and is of a mixture of scale, built form and materiality that is in keeping with the National Park. To ensure the proposed development is well-integrated within this landscape character, an LVIA (Document Reference: B17545-123532-14-XX-RP-NA-EI0089) has been prepared to support this planning application. The LVIA seeks to assess the potential landscape and visual effects likely to result from the proposed Scheme during construction and in years 1 and 15 of operation, as well as identify any relevant mitigation. 12 representative viewpoints including five wireframes from sensitive receptors were assessed within the LVIA.

The LVIA finds that moderate adverse effects will arise during the construction phase to both landscape character and views, particularly in the immediate vicinity of the WTW. This is because the introduction of machinery and construction activity will contrast with the otherwise undeveloped, rural character of the area. In order to mitigate any adverse construction effects, the LVIA proposes extensive mitigation measures during this phase in accordance with industry best practice, which includes:

- The use of muted construction colours and finishes to minimise temporary visual contrast with the surrounding upland landscape;
- Prioritisation of early establishment of mitigation planting to offer early screening;
- The reduction of height and spread of material stockpiles and the planning of sensitive crane operations to avoid skyline intrusion;
- Minimisation of construction lighting; and
- The control of dust and soil disturbance through standard best practice measures to prevent noticeable short term changes in landscape condition.

In terms of operational impacts, the LVIA finds that long term effects are limited and localised, with the scheme assessed as capable of being accommodated within its upland setting without undermining the wider landscape character, scenic quality or special qualities of the National Park. In order to achieve this, a series of design-led mitigation measures are proposed, which are also discussed extensively above as part of Section 6.4 of this Statement. The measures proposed consist of:

- The proposed building size, massing and materiality have been designed to reflect local vernacular and to integrate within the local landscape.
- The access road has been designed to ensure its appearance reflects the rural nature of the area, and to avoid “urbanising” the character of the surrounding landscape.
- Mitigation planting has been incorporated into the design, to soft the visual impact of the new building and to improve biodiversity.
- The permanent lighting has been designed to minimise impacts upon the rural and undeveloped nature of the surrounding landscape.

These measures ensure that operational effects are reduced to Minor Adverse or Negligible for most receptors assessed in the LVIA by Year 15. Therefore, any impacts would not be significant in the context of the wider landscape character or the National Park.

Enhancements to the landscape design are also illustrated within the Landscape Proposal drawing (Drawing Reference: B17545-123532-14-XX-DR-NA-EI1222). This includes proposed tree and hedgerow planting locations, which will also perform the screening function set out above.

Accordingly, the Scheme complies with Section 6.3 of PPW and LDP Policy I, as although a new building and associated temporary construction activity will be introduced to the landscape, appropriate mitigation has been provided to ensure their successful integration with the local landscape character. This confirms that any impact will be limited in nature and where unavoidable, localised to the immediate vicinity of the site.

6.6 Ecology

6.6.1 Arboriculture

The starting point for planning purposes relating to arboriculture is PPW 12 Paragraph 6.4.42, which seeks to resist the permanent removal of trees, woodland and hedgerows unless it would achieve significant and clearly defined public benefits. Where loss is unavoidable, PPW 12 requires compensatory planting at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost. It is further added in Paragraph 6.4.42 that replacement planting should preferably be onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost.

BBNPA Policy 8 further seeks to resist the loss of trees and requires development proposals on sites containing trees will be required to provide a Tree Survey and a Tree Protection Plan in support of the proposal. The policy adds that where the NPA agrees to the removal of trees as

part of the development scheme, appropriate replacement must be provided on site utilising native trees of local provenance.

An Arboricultural Impact Assessment (AIA) (Document Reference: B17545-123532-14-XX-RP-NA-EI0062) has been prepared in accordance with the relevant BS 5837:2012 standards to accompany this planning application. A Tree Constraints Plan (Drawing Reference: B17545-123532-14-XX-DR-NA-EI1206) and Tree Protection Plan (Drawing Reference: B17545-123532-14-XX-DR-NA-EI1207) have also been provided alongside of this application.

A review was undertaken as part of the AIA to determine the presence of ancient, veteran and notable trees using the Woodland Trust’s Ancient Tree Inventory which confirmed that none of these were present and therefore affected.

The surveys undertaken as part of the AIA identified 13 individual trees, nine tree groups, two hedgerows and two woodlands on the site during the survey. A summary of the tree survey undertaken as part of the Arboricultural Impact Assessment is shown in Table 6.1.

Table 6.1: Tree Survey Summary

Tree Category	Description	Total Number surveyed
Category A	Tree or groups of high quality	1 tree
Category B	Trees or groups of moderate quality	10 individual trees, 4 tree groups, 2 woodlands
Category C	Trees or groups of low quality	1 individual tree, 5 tree groups and 2 hedgerows.
Category U	Trees recommended for removal irrespective of the proposed Scheme	1 individual tree

In order to facilitate the Scheme design, one hedgerow is proposed to be removed. The location of this hedgerow is shown on the submitted Tree Protection Plan. The hedgerow identified as being necessary for removal has been assessed as Category C as the hedgerow is predominantly young and unmanaged, with two semi mature trees at the southern end which have been allowed to outgrow the hedgerow.

The AIA outlines protection measures for tree protection and tree pruning to facilitate development. This includes measures to avoid root damage or severance for existing trees.

Replacement planting is proposed at a 3:1 ratio in accordance with Paragraph 6.4.42 of PPW 12. The final planting locations will be determined in conjunction with BBNPA’s ecologists, with the aim to enhance the surrounding habitat. A Landscape and Ecology Management Plan (LEMP) (Document Reference: B17545-123532-14-XX-PR-NA-EI0085) has also been provided to accompany the application, which provides a 30-year management plan to ensure landscape is adequately maintained.

The Scheme therefore accords with PPW 12 and LDP Policy 8 as while the loss of a hedgerow is unavoidable to facilitate the Scheme, appropriate compensatory planting will be achieved. The replacement trees will be native species as specified in the Landscape Proposal drawing (Drawing Reference: B17545-123532-14-XX-DR-NA-EI1222), in line with LDP Policy 8 to further enhance the quality of the local habitat.

6.6.2 Ecology

Section 6.4 of PPW 12 states that development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature to enable the improvement and the resilience of ecosystems.

BBNPA LDP Policy SP3 seeks to ensure that development proposals in the National Park must demonstrate that the proposed development does not have an unacceptable impact on, nor detract from, or prevent the enjoyment of ecology and biodiversity assets both within and beyond designated sites.

LDP Policy 6 further adds that development will only be permitted where the developer proves to the satisfaction of the NPA that there is no unacceptable loss or fragmentation of a habitat or landscape feature and/or increased isolation on important species.

A number of supporting studies have been produced which should be read in conjunction with this Statement:

- Bat Survey Report (Document Reference: B17545-123532-14-XX-AS-NA-EI0011)
- Barn Owl Survey Report (Document Reference: B17545-123532-14-XX-RP-NA-EI0082)
- Badger Survey Report (Document Reference: B17545-126532-14-XX-AS-NA-EI0050)
- Dormouse Survey Report (Document Reference: B17545-126532-14-XX-AS-NA-EI0055)
- Hedgerow Survey Report (Document Reference: B17545-126532-14-XX-AS-NA-EI0057)
- Preliminary Ecological Appraisal Report (PEAR) (document ref: B17545-126532-14-ZZ-AS-NA-EI0006).

An Ecological Impact Assessment (EclA) (Document Reference: B17545-123532-14-XX-AS-NA-EI0083) has been undertaken by Mott MacDonald in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) 'Guidelines for Preliminary Ecological Appraisal' (2017) and 'Guidelines for Ecological Impact Assessment in the UK and Ireland' (2018, updated in April 2022) to provide an assessment of the protected and/or notable habitats and species which occur or have the potential to occur on or near to the site, and therefore could be impacted by the proposed works.

As set out in Section 2.2.3 of this Statement, five statutory designated sites were identified within 2km of the proposed development. This includes one Special Area of Conservation (SAC), Coedydd Nedd a Mellte, which lies 0.47km to the west of the site. The remaining statutory designated sites within 2km of the proposed development consist of four Sites of Special Scientific Interest (SSSI), which are as follows:

- Dyffrynoedd Nedd a Mellte a Moel Penderyn – located 0.26km to the north west of the site;
- Caeau Nant y Llechau – located 0.74km to the north west of the site;
- Bryn-bwch – located 1.1km to the north east of the site; and
- Gweunydd Dyffryn Need – located 1.2km to the north of the site.

A Section 7 Priority Habitat type, Native Hedgerow, has further been found within the footprint of the Proposed Development.

The EclA finds there may be limited indirect impacts to ecological receptors as a result of the proposed Scheme. This is due to potential risk related to run-off and dust deposition. It is also acknowledged that a partial loss of the Native Hedgerow may occur to widen an existing hedgerow gap in order to connect pipework into the existing WTW.

The EclA sets out mitigation measures that should be adopted to minimise any potential impacts on ecological receptors. On this basis, a non-exhaustive list of recommendations from the EclA is set out below:

- Reinstatement of all hedgerow habitat lost upon completion of the works, as well as a new planted as part of landscaping enhancements;

- The implementation of pollution prevention measures construction to avoid silt or run-off entering watercourses;
- Any vegetation clearance required will be undertaken outside of the breeding bird season (March to August inclusive), with pre-clearance checks to be undertaken by an experienced ecologist;
- Control measures to prevent the spread of invasive species will be outlined within a Construction Environmental Management Plan (CEMP) to ensure invasive plant species do not spread into neighbouring habitats. This should include the demarcation of invasive species on site throughout the construction phase, a site-specific toolbox talk to all construction staff prior to the commencement of the works and biosecurity measures.
- Works likely to impact roosting bats will be undertaken outside of the maternity season (May to August inclusive) (i.e. works within 30m of the known roosts within Cefn Dryskoed WTW); and
- Temporary noise barriers will be installed to reduce impacts to roosting bats.

To support this application, a CEMP (Document Reference: B17545-123532-14-XX-PR-NA-EI0086) has also been produced which further embeds the mitigation measures outlined above to ensure no negligible ecological impacts.

As such, the Scheme is considered to comply with LDP Policies SP3 and 6, as the mitigation measures proposed will ensure no unacceptable impacts will be caused to ecological receptors. The EclA concludes that the compensation measures proposed alongside additional enhancement measures will deliver beneficial residual effects for biodiversity. Further information about ecological enhancements is set out below in Section 6.6.3.

6.6.3 Net Benefits for Biodiversity

The Environment (Wales) Act 2016 Section 6 duty places a legal obligation on public bodies in Wales to 'maintain and enhance biodiversity' whilst carrying out their functions.

Section 6.4 of PPW 12 furthers sets out that development must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. Paragraph 6.4.10 outlines the DECCA framework, which should be applied as part of implementing the duty. Paragraph 6.4.11 of PPW 12 requires a step wise approach to be taken to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for. It specifies that enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

Policy 9 of Future Wales: The National Plan 2040 further requires new development to provide a net benefit for biodiversity.

Accordingly, a Green Infrastructure Statement (Document Reference: B17545-123532-14-XX-BR-NA-EI0084) has been prepared by Mott MacDonald to support this planning submission. The Green Infrastructure Statement details how the Scheme will provide a net benefit for biodiversity in line with the Section 6 Duty, the DECCA Framework and the principles embedded in PPW 12. The measures proposed to achieve a net benefit for biodiversity comprise of:

- Upland seeding across disturbed areas
- New native woodland planting (feathered trees and whips)
- 77m double-staggered native hedgerow
- Creation of a new pond with native aquatic vegetation
- Provision of bird and bat boxes on the new WTW building

- Retention and reinforcement of existing boundary features

Table 6.2 below provides a summary of how the proposed biodiversity enhancement measures accord with the DECCA Framework.

Table 6.2: Proposed NBB measures and their compliance with the DECCA framework

Diversity	The diversity of species and habitat types at the site will be improved by implementing the proposed enhancements. Species diversity will be increased through grassland management of areas of species-poor modified grassland with a target of more than 10 species per m ² . Orchard planting and creation of a pond will also increase the diversity of habitat types present, improving habitat availability and quality for a range of species.
Extent	The extent of woodland, hedgerow and tree lines will be increased at the site by planting these habitat types. The extent of semi-improved grassland will also be increased through management of modified grassland to increase species diversity and condition.
Condition	At present, the band of lowland dry acid grassland is showing signs of nutrient enrichment, with species such as creeping thistle encroaching into the sward. Grassland management will improve the condition of this habitat and retain it in the long-term. Grassland management of modified pasture will also improve species diversity and condition.
Connectivity	Broadleaved tree planting along the southern border of the field will improve connectivity by connecting existing tree lines within the WTW to the west to existing hedgerows in the east. The creation of this tree line would provide opportunities for foraging and/or commuting bats, birds, badger and other mammals. The site is also located within two NRW Priority Ecological Network sites for semi-improved natural grassland and native woodland (Welsh Government, 2026). The proposed woodland planting and grassland enhancements will contribute to the larger ecological network of these habitat types, within the wider area. The habitats will provide 'stepping-stones' of suitable habitat in the wider landscape.
Adaptability (to change)	Management of the lowland dry acid grassland will contribute to the retention of this Section 7 Priority Habitat type, whilst increasing the diversity of habitat types present will also improve the sites adaptability in the long-term, providing variation in the opportunities present for a range of species. Increasing tree canopy cover will improve carbon storage and heat retention at the site, improving the long-term adaptability of the site.

Therefore, it is considered that the proposals provide a net benefit for biodiversity in accordance with the Environment (Wales) Act 2016, PPW 12 and the Future Wales: The National Plan 2040 Policy 9 as measures are proposed within the Green Infrastructure Statement which comply with the DECCA Framework and seek to provide significant ecological enhancements. In accordance with PPW 12 and LDP Policy GP5, the step wise approach has been followed to ensure adverse effects on biodiversity are firstly avoided, then minimised, mitigated, and as a last resort compensated for.

6.7 Heritage

The Historic Environment Wales Act (2023), Planning Policy Wales (2024), and the BBNPA LDP set out the importance of the historic environment and the need to consider potential impacts upon it when planning new development.

BBNPA LDP Policy 17 sets out that development proposals that would adversely affect the setting of a listed building will not be permitted.

While there are no designated or non-designated heritage assets within the site boundary, there are a number of designated and non-designated heritage assets within the vicinity of the site. Further detail regarding these heritage assets is set out above in Section 2.2.2 of this document, and within the Heritage Desk Based Assessment (DBA) (Document Reference: B17545-123532-14-XX-RP-NA-EI0063) which has been prepared by Mott Macdonald to support this application. In addition, the Heritage DBA examines in detail the impact the proposed development would have on the setting of heritage assets in the vicinity of the site.

In terms of the designated heritage assets, the DBA finds that no harm is predicted as a result of the Scheme to any designated heritage asset. The three scheduled monuments assessed, Dinas Silica Mine (Cadw:BR229), Craig Y Ddinas Hillfort (Cadw: BR178) and Glynneath Gunpowder Works (Cadw: BR230) all lie between 1.4 and 1.5km south east of the proposed development. It is considered that proposed Scheme would not be visible from the scheduled monuments due to the long distance, the topography and proposed screening. Furthermore, the Grade II listed building assessed, Pont Melin-fach (Cadw:85436), is located approximately 1km north of the proposed development and the proposed Scheme would also not be visible as a result of the long distance and the shielding of the building by trees on all sides.

Relating to the non-designated heritage assets assessed as part of the study, the DBA acknowledges that there may be some impact on the setting of three non-designated post-medieval farm buildings now incorporated into Cefn Dryskoed WTW, located less than 100m to the west of the site. This is because the proposed development would block views of the farm buildings from the road. However, the farm buildings do not meet the criteria for BBNPA's local list and extensive works and development have already taken place within and around these non-designated assets, such as during its conversion into a WTW and the several extensions that have occurred since. Therefore, the Heritage DBA concludes that this is anticipated to amount to less than substantial harm. Similarly, the Heritage DBA sets out that the proposed development may also alter the setting of the existing farm buildings at Gwern-bleiddgi farm, located approximately 100m to the south of the site, as they would no longer be within open agricultural fields. Nevertheless, the proposed development is assessed as causing less than substantial harm to the non-designated asset as only one field is impacted.

The Heritage DBA does conclude there is potential for the proposed development to result in substantial harm to ridge and furrow and substantial harm to or total loss of archaeological remains on the site. It is noted that any archaeological remains present would be truncated or removed and there is also potential for compression. The DBA advises that further surveys would be required to determine the presence or absence of archaeological remains on the site to mitigate this risk and consultation with Heneb (Clwyd Powys) local authority archaeologist is ongoing. The archaeological/geophysical surveys set out in the DBA are currently being undertaken, the findings of which will be shared with Heneb and BBNPA when available. The need for any further surveys will be more fully understood following the results of geophysical survey.

In summary, the Scheme is considered to comply with national policy and guidance, as well as BBNPA LDP Policy 17 as no impact is expected to the designated historic assets in the vicinity of the site, amounting to no harm. While the DBA acknowledges that non designated heritage assets nearby will experience some change in setting, it is considered that this would amount to less than substantial harm. Although there is the potential for substantial harm or total loss to archaeological remains and ridge and furrow, geophysical surveys are ongoing in consultation with Heneb and BBNPA to minimise this risk.

6.8 Transport and Access

6.8.1 Transport and Access

Paragraph 4.1.39 of PPW 12 sets out that Design and Access Statements should demonstrate how the design and layout of the development will reduce the level and speed of traffic to appropriate levels.

Whilst there is an existing access to the application site suitable for tractors, a new vehicular access is proposed to be created from Ystradfelte Road, with a tarmac bell mouth and 4.4m wide stone dusted site access road to connect the DAF building itself to the highway. This has been reduced from a width of 6m following the receipt of discretionary pre-app advice from NRW who expressed concern regarding the urbanising influence of the access track. The access road remains appropriately designed and sized to bring circa 4.8m x 9.3m x 3.3m pre-fabricated steel tanks onto site, along with any further equipment needed for maintenance. The proposed access route has also been designed to ensure that there is sufficient room for long vehicles to turn around and exit. This ensures that the length and width of the access road has been kept to a minimum to limit the more urban influence of the development as per NRW's discretionary advice, whilst still meeting operational requirements.

Despite creation of this new vehicular access, it is not considered that the DAF building itself would generate an additional number of trips to the WTW site. However, there may be a short-term increase in traffic during the construction period. Therefore, a Construction Traffic Management Plan (CTMP) (Document Reference: B17545-123532-14-XX-PR-NA-CJ0081) has been prepared to support the planning application at the site. This is supported by a Traffic Management Layout Plan (Drawing Reference: B17545-123532-14-ZZ-DR-NA-EI1221).

The CTMP includes a series of mitigation measures to control the movement of HGVs during construction, which includes:

- Agreed hours of operation;
- Road signs being erected on the road network in strategic locations for the duration of the construction period to direct HGVs to established designated routes;
- Wheels and tracks to be cleaned upon leaving the working area to reduce mud and debris being deposited onto the road network;
- A comprehensive induction being given for all personnel involved in the project to ensure that all staff, subcontractors and delivery drivers are fully aware of traffic management protocols;
- GS6 Barriers being installed for Overhead Lines to ensure secure passage; and
- All loads being appropriately sheeted (where necessary) and securely fastened to prevent any materials from falling, spilling, or becoming dislodged during transit, thereby safeguarding both site workers and the general public.

Therefore, it is considered that the approach to construction traffic complies with PPW 12 Paragraph 4.1.49 as traffic management measures will be implemented to ensure no unacceptable harm to the public highway while construction is ongoing.

Further information about the proposed Scheme's interface with the PRowWs is set out below.

6.8.2 Public Rights of Way (PRow)

BBNPA LDP Policy 49 states that development that would prevent or adversely affect the use of a public right of way will only be permitted where an equivalent alternative route can be provided.

As shown in Section 2.2.4 of the statement, two PRowWs, Footpath 41/17/1 and Footpath 41/43/1 fall within in the site boundary.

Although there will be no permanent impact on Footpath 41/17/1, a temporary closure is proposed from its intersection with the Restricted Byway 41/83/4 up to its intersection with Ystradfellte Road. This is in order to prevent the users of the footpath to cross the construction site. A footpath diversion will be provided alongside Ystradfellte Road, the route of which has been shown in the Traffic Management Layout Plan.

The northern most section of the Footpath 41/43/1 (north from the Restricted Byway 41/83/4 will also be temporarily closed. In order to mitigate this, a temporary diversion was considered. However, due to the scale of construction works that will be required in the vicinity, it would not be considered safe or appropriate to divert the footpath. This footpath is not visible on the ground and therefore has not been shown in the drawings.

Engagement with the PRowW Officer at BBNPA has been undertaken on the above issue, with no objection having been raised. This was provided in writing. A separate application will be made to the ProW Officer in due course for the temporary stopping up of the PRowWs.

6.9 Drainage

Paragraph 6.6.18 of PPW 12 sets out that the provision of sustainable drainage systems (SuDS) must be considered as an integral part of the design of new development and considered at the earliest possible stage when formulating proposals for new development. This is echoed in TAN 15. The SuDS National Standards are also referred to in TAN 15, which sets a hierarchy for management of surface water discharge.

A Drainage Strategy Report will be submitted to the SuDS Approving Body (SAB) for approval separately to this planning application. However, Paragraph 7.6 of TAN 15 sets out that where planning permission is sought prior to SAB approval, the applicant will be expected to provide a Drainage Statement as part of the planning application.

To meet this requirement, a Drainage Statement (Document Reference: B17545-123532-14-XX-NN-CA-EI0093) has been provided to support this application and demonstrates how surface water will be discharged in accordance with the SuDS standards. Surface water runoff from the new access road will be infiltrated to the ground adjacent to the road via a trench soakaway.

Therefore, it is considered that the Scheme complies with PPW 12 and other relevant national guidance as the approach to SuDS has been considered at early design stages and the use of nature-based solutions maximised in accordance with the SuDS hierarchy.

6.10 Pollution and Amenity

Paragraph 6.7.26 of PPW 12 states that planning authorities must consider the potential for temporary environmental risks, including airborne pollution and surface and subsurface risks, arising during the construction phases of development. Where appropriate planning authorities should require a construction management plan, covering pollution prevention, noisy plant, hours of operation, dust mitigation and details for keeping residents informed about temporary risks.

In terms of pollution, LDP Policy 12 seeks to reduce the risk of light pollution and requires a lighting scheme to be provided for proposals where lighting will be required. LDP Policy 14 seeks to minimise the risk of air quality.

It is recognised that the proposed Scheme could give rise to pollution caused by noise, dust and contamination during the construction phase. To mitigate the risk of this, a CEMP (Document Reference: B17545-123532-14-XX-PR-NA-EI0086) has been produced to support this

application. The CEMP outlines a series of detailed mitigation measures to minimise any potential pollution from any source while the construction compound is operational. This includes:

- Site layout has been planned so that machinery and dust causing activities including material are located away from sensitive receptors;
- Enclose site or specific operations, where possible, when there is a high potential for dust production;
- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction e.g., suitable local exhaust ventilation systems
- Materials that have a potential to produce dust will be removed from site as soon as possible, unless being re-used on site. If they are being re-used on site they will be covered as deemed necessary
- Waste to be stored in suitable containers of sufficient capacity to avoid loss, overflow or spillage; and
- Best Practicable Means (BPM) of noise control will be applied during construction works to minimise noise (including vibration) to sensitive receptors from construction activities.

The measures outlined in the CEMP are also illustrated in the Pollution Prevention Layout Plan (Drawing Reference: B17545-123532-14- ZZ-DR-NA-EI1220).

With regards to artificial lighting, a Lighting Plan (Drawing Reference: B17545-123532-14-ZZ-DR-EA-PN1225) has been provided to support this application. This plan illustrates where external lighting will be provided. Measures to reduce the risk of light spill include:

- All external lighting shall be cool (2700k or lower) on the assumption that the colour rendering index of 60 is met;
- All external lighting shall consist of PIR switched bulkhead fittings and be pointed downwards to the task areas.
- External lighting wavelength to be higher than 550nm due to the presence of bats near to the area. This is to be reviewed closer to the detailed design stage of the lighting itself and the selection of specific light fittings;
- Column heights shall be designed to avoid light spill as far as practical (hoods/cowls) if necessary; and
- External light on the top corner of the building shall be directed away from the hedge.

Therefore, it is considered that the proposals comply with PPW 12 and LDP Policies 12 and 14 as detailed and appropriate mitigation measures to control the risk of pollution are proposed through the CEMP. This will ensure that no adverse impacts will arise as a result of the construction and operation of the Scheme.

7 Summary and Conclusions

To summarise, Mott MacDonald Limited ('the Agent') has been instructed by DCWW ('the Applicant') to submit an application seeking planning permission for works to construct a new dissolved air floatation (DAF) building, required for treatment stage at the front end of the treatment process to reduce manganese levels and increase drinking water quality. It will in effect be an extension to the existing Water Treatment Works on site.

A planning application is to be submitted to BBNPA as the Local Planning Authority, seeking permission for the following:

“The construction of a new dissolved air floatation (DAF) building to house the installation of three new DAF tanks, DAF Motor Control Centre, flocculators and other processing and ancillary equipment, the installation of new electrical cabling, distribution boards, PLC and instrumentation, pipelines to connect the new DAF building to the existing WTW and to connect the existing raw water main to the DAF plant including associated chambers and ducts for chemical dosing, as well as a new stone wall, fencing, drainage, soft landscaping, access track and temporary enabling works”.

The policies within the Local Development Plan have been carefully considered and the points raised at pre-application addressed, as demonstrated in Tables 4.1 and 4.2 of this Statement. The principle and location of development is supported by the clear and demonstrable need to enhance the function of the existing WTW site at Cefn Dryskoed and ensure continued access to clean drinking water. This acts as justification for the location of the proposed development within a rural setting within the National Park in accordance with LDP Policies SP1 and SP2.

It is acknowledged that the proposed Scheme is taller than other buildings in the local vernacular, but care has been taken to develop a design that is sensitive to the rural character of the area through its form, material palette and landscaping. This ensures the Scheme is appropriate to the surroundings and will enhance the character of the Park's Natural Beauty, wildlife, cultural heritage and built environment in line with BBNPA LDP Policy I.

Whilst the Scheme does result in a small loss of hedgerow and potential impacts on ecological receptors during the construction phase, effective mitigation measures are proposed. This includes replacement tree planting in line with the 3:1 ratio set out in PPW12, and the provision of a net benefit for biodiversity across the Scheme.

In accordance with Paragraph 6.7.26 of PPW 12, appropriate mitigation measures will be implemented through a CEMP to ensure no negligible impacts on pollution or amenity. In relation to potential increases in traffic, the CTMP provides additional mitigation measures to reduce any impacts to an acceptable level while construction is ongoing.

Overall, the Scheme will reduce manganese levels at an existing WTW to ensure an acceptable quality of drinking water. This application should be assessed on balance, taking into account the material provisions of the Local Development Plan, and other material considerations when read as a whole. On this basis, it is respectfully requested that this planning application be approved, subject to the attachment of suitably worded planning conditions.

