

Application Number: 23/0606/COU

Date Received: 30.08.2023

Applicant: D2 PropCo Ltd

Description and Location of Development: Change the use from Residential to HMO C4 - 17 Broomfield Street Caerphilly CF83 1FY

APPLICATION TYPE: Change of Use

SITE AND DEVELOPMENT

Location: No. 17 Broomfield Street Caerphilly is set on the eastern side of the highway with direct access to the high street (Cardiff Road) and other services within the Town Centre.

Site description: The application property is a traditional end-of-terrace dwelling set within a residential area along a one-way street. The immediate terrace comprises of residential dwellings which benefit from residents only permit parking along both sides of Broomfield Street. The application property benefits from a small rear courtyard providing secluded, outdoor amenity space with a detached garage accessed from a rear service lane. The property is set off the street with an enclosed front amenity area that is currently used for bin storage.

Development: Planning permission is sought for the change of use of the property from C3 Residential Dwelling to a C4 House in Multiple Occupation (HMO).

Dimensions: No external alterations.

Materials: Not applicable.

Ancillary development, e.g. parking: None is proposed.

PLANNING HISTORY 2010 TO PRESENT None.

POLICY

LOCAL DEVELOPMENT PLAN Caerphilly County Borough Local Development Plan up to 2021 - Adopted November 2010 (LDP).

Site Allocation: The application site is within settlement limits.

Policies: SP3 (Development Strategy - Development in the Southern Connections Corridor), SP4 (Settlement Strategy), SP5 (Settlement Boundaries), SP6 (Place

Making), CW2 (Amenity), CW3 (Design Considerations: Highways), and CW15 (General Locational Constraints).

SUPPLEMENTARY PLANNING GUIDANCE The following pieces of Supplementary Planning Guidance (SPG) have been formally adopted, following public consultation, and are material considerations that will be considered when considering this proposal:

LDP5: Car Parking Standards, Revision No. 2 (adopted January 2017);
LDP6: Building Better Places to Live, Revision No. 3 (adopted January 2017); and
LDP7: Householder Developments, Revision No. 3 (adopted January 2017).

NATIONAL POLICY Future Wales: The National Plan 2040 (February 2021) and Planning Policy Wales (PPW), Edition 11 (February 2021).

Welsh Government - Houses in Multiple Occupation: Practice Guidance (March 2017):

This guidance is a companion document to Houses In Multiple Occupation: Review and Evidence Gathering, a report setting out the findings of a study commissioned by the Welsh Government into the impact of houses in multiple occupation (HMOs) concentrations on local communities in certain areas in Wales. The purpose of this guidance is to promote good practice that has been adopted in Wales, which has had positive results regarding the management and control of HMOs, to enable local authorities in Wales to make informed decisions on what is best suited to their area taking into account local circumstances. This guidance also provides a summary of the legal framework relating to HMOs and associated issues.

PPW is supported by Technical Advice Notes (TANs) which provide detailed planning advice. The following TANs are of relevance:

Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009); and
Technical Advice Note (TAN) 12: Design (2016).

ENVIRONMENTAL IMPACT ASSESSMENT

Did the application have to be screened for an EIA? No.

Was an EIA required? No.

COAL MINING LEGACY

Is the site within an area where there are mining legacy issues? The application site is located within a Coal Mining Development Referral Area (2023) - Development Low Risk Area. Informative advice notes advising of coal mining conditions in this area will be provided to the applicant, and should any issues arise, these would be dealt with as part of the building regulations approval process.

CONSULTATION

Environmental Health Manager - Provides advice to be conveyed to the developer.

Transportation Engineering Manager - CCBC - No objection.

As a 3 bedroom property in a sustainable location, the dwelling as it stands would have a hypothetical requirement of 2 off-street car parking spaces. The same would apply for a 4-bed dwelling. No objection is raised from a highway safety perspective. The residents of the HMO as a whole would only be entitled to apply for 2 residents parking permits overall, which would also apply to the existing 3-bed dwelling.

Caerphilly Town Council - Caerphilly Town Council has resolved to object to this application as the property is considered unsuitable for a HMO and will have an adverse impact on the residential amenity of the area which is characterised by terrace houses occupied by single households.

ADVERTISEMENT

Extent of advertisement: The application was advertised via neighbour notification letters issued on 06/09/2023 and display of a site notice on 20/09/2023.

Response: At the time of finalising the officer report 20 No. representations have been received, 17 of which OBJECT to the planning proposal.

Summary of observations: The key points raised are summarised below:

1. Neighbouring residents with small children should not have to live next door to this housing, with hostel rooms for ex-convicted criminals.
2. The HMO/COU will impact the local housing market and devalue surrounding properties.
3. The application was not widely advertised.
4. HMO with potentially 4 No. extra cars will add to the parking problem along Broomfield Street.
5. An HMO is not justified on this street - is there a need for an HMO in this area?
6. Occupants of this property can look directly into the living rooms and gardens of those next door and on the opposite side of the street with vulnerable, elderly, and young child occupants.
7. These street and surrounding back lanes are poorly lit at night which will encourage antisocial behaviour and criminal activity at this HMO.
8. The HMO presents a safety issue to local children and there will not be enough policing.
9. This is an ideal family home in the town centre and will be lost to an HMO. The open housing market in this area is already limited.
10. Residents gathering outside will intimidate locals walking along this street and trying to enjoy their own properties.

11. Occupants pose a threat to security levels of property in this area - Criminals and offenders can directly trespass into surrounding properties.
12. Increased levels of noise and disturbance as a result of many occupants within one property.
13. Drug and alcohol use will be welcomed into a residential area.
14. Idea of living next door to HMO is causing mental distress to occupants.
15. Vandalism will be a problem.
16. Saturation of HMOs within the immediate surrounding area.

SECTION 17 CRIME AND DISORDER ACT

What is the likely effect of the determination of this application on the need for the Local Planning Authority to do all it reasonably can to prevent crime and disorder in its area?

There are no specific crime and disorder implications material to the determination of this application.

EU HABITATS DIRECTIVE

Does the development affect any protected wildlife species? In this instance there are unlikely to be any significant ecological impacts. Under the Section 6 duty of the Environment (Wales) Act 2016, the Council must seek to maintain and enhance biodiversity and promote ecosystem resilience.

If appropriate planning conditions may be applied to request biodiversity enhancement measures at this site. The provision of enhancement features will be proportionate to the scale, location and nature of the development and will respond to any information provided in Ecological Reports and Surveys regarding the potential negative effects of the development and opportunities for the enhancement of biodiversity that the proposed development affords.

Planning Policy Wales (Edition 11, February 2021): Section 6.4 places a duty on local authorities to ensure that biodiversity and resilience are fully considered by Local authorities. Particular reference is made to The Section 6 Duty (Environment Act) to ensure that planning authorities demonstrate that they have sought to fulfil the duties and requirements of Section 6 of the Environment Act by taking all reasonable steps to maintain and enhance biodiversity in the exercise of their functions.

Future Wales - The National Plan 2040: Policy 9, states that 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. In that regard biodiversity enhancements can be sought as part of this development through any additional landscaping proposals required if the development is considered acceptable in all other areas.

Technical Advice Note 5: Nature Conservation and Planning: Section 6.2.1 states, the presence of a protected species is a material consideration when a local planning authority is considering a development proposal, that, if carried out, would be likely to result in disturbance or harm to the species or its habitat. Further to this, Section 6.2.2 highlights, It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.

The Environment (Wales) Act: became law on 21st March 2016 and replaces the Natural Environment and Rural Communities Act 2006. It puts in place legislation to enable Wales's resources to be managed in a more proactive, sustainable, and joined up manner and to form part of the legislative framework necessary to tackle climate change. The Act supports the Welsh Governments wider remit under the Well-Being of Future Generations (Wales) Act 2015 so that Wales may benefit from a prosperous economy, a healthy and resilient environment, and vibrant, cohesive communities. Caerphilly County Borough Council as a public body has obligations under section 6 of the Environment (Wales) Act 2016 to demonstrate how the Local Authority will "seek to maintain and enhance biodiversity in the proper exercise of their functions and in doing so promote the resilience of ecosystems".

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Is this development Community Infrastructure Levy liable? The development is CIL Liable.

ANALYSIS

Policies: The main issues for consideration regarding this application relate to the compatibility of the proposed use in this context, whether there are any adverse impacts upon the current levels of highway safety along Broomfield Street and the impacts of the proposal upon residential amenities in respect of Policy CW2 of the Caerphilly County Borough Local Development Plan up to 2021 (Adopted November 2010), the Future Wales document, Planning Policy Wales (PPW) and the above referenced Supplementary Planning Guidance (SPG) documents. There are in this case considered to be no additional issues arising from the provisions of the Human Rights Act.

The proposal comprises the change of use of 17 Broomfield Street, from use as a single dwelling (C3) to a House in Multiple Occupation (C4). The application site is within the defined settlement boundary and the proposal is acceptable in principle, conforming to the requirements of Policies CW15 (General Locational Constraints) and SP5 (Settlement Boundaries).

Conversion of the property to a 4 No. bedroomed HMO is facilitated by internal subdivision of a larger open plan living space at ground floor into a smaller living room with bedroom No. 1 at the front of the property. There are no proposed external works,

such that the character of the host dwelling is wholly preserved. All 4 No. bedrooms are of a suitable size and benefit from an open outlook with adequate levels of natural light via large openings. Occupants will benefit from communal/social living with a shared kitchen, living room and shower room. The HMO has been identified for use as temporary accommodation for young adults (16 - 18 years) within the Caerphilly Borough and is a contribution of private housing for the Councils Housing Solutions Team.

The property will be managed by D2 Prop Co. Ltd. In a statement prepared by this party, dated 27/09/23 the following is stipulated: "The management structure is set out such that the property and tenants are visited daily (Mon-Fri) by the dedicated house manager to check on their welfare and the condition of the property. Any issues are reported to the housing team and any maintenance issues are reported to our dedicated maintenance team. There will be CCTV cameras covering all communal parts of the property, each morning these cameras are checked, and a full report is sent to the housing team." In addition, Tenants placed by CCBC Housing Services are not on occupation contracts but licences and therefore if breaches of rules occur then these issues are promptly dealt with, and placements can be terminated, and tenants placed elsewhere. D2 advises they operate a 24/7 on-call system for both tenants and neighbours and this number will be made available.

A number of planning objections relate to the end-user of this accommodation. Proposals (notably HMO's) which threaten 'amenity' by the introduction of increased numbers of people, possibly with different social characteristics, invariably attract vociferous objection from local vested interests. Section 1.3 of Welsh Governments, Houses in Multiple Occupation (March 201) advises: "HMOs provide a source of accommodation for certain groups, including students temporarily resident in a locality and individuals and/or small households unable to afford self-contained accommodation. Concerns can arise with the management of HMOs because of the transient nature of many tenancies, with many residents on low incomes and/or from vulnerable groups, the intensive use of shared facilities and lack of interaction between residents who may be complete strangers to each other. Consequently, HMO use of a house will generally be more intensive than single household use. This may have an impact not just on the residents in an HMO but on the wider neighbourhood and the likelihood of this increases where there are high concentrations of such properties."

This factor has been taken into account, however, the bulk of these concerns are not material planning considerations. The planning system does not exist to protect the private interests of one person against the activities of another. Proposals should be considered in terms of their effect on amenity and existing use of land and buildings in the public interest.

Advice contained within paragraph 5.83 of Welsh Government Circular: The use of Planning Conditions for Development Management (WGC 016/2014) stipulates, "since planning controls are concerned with the use of land rather than the identity of the user, the question of who is to occupy the premises for which permission is to be granted will

normally be irrelevant. Conditions restricting occupancy to a particular occupier or class of occupier should only be used when sound planning grounds can be demonstrated, and where the alternative would normally be refusal of permission. A local planning authority who imposes such conditions may run the risk of contravening its duties under the Equality Act 2010 and care should be taken to avoid such conflict. Conditions should not be imposed which provide for a system of vetting by the local planning authority or the use of a vague test such as "needing to be located in the area".

Strategic housing policy objectives at all levels seek to create sustainable, inclusive, mixed communities in all areas. Local policies are informed by a robust evidence base with regard to housing need and demand. Furthermore, sustainable development has become a primary focus of national guidance which has significant implications for all aspects of new development but particularly housing supply, accessibility and parking provision and the effective and efficient use of land. Guidance is clear that the conversion of existing housing can provide an important source of new housing.

In the case of this proposal the property is of a size, whereby the layout, room sizes, range of facilities and external amenity space of the resulting property would ensure an adequate standard of residential amenity for future occupiers. In addition the property is located less than 0.60km from Cardiff Road within the Principal Town Centre (Caerphilly), such that occupants have direct access to a range of services, facilities and transport links. The property is a 4-minute walk to Caerphilly Train Station. This is a highly favourable location for a property of this nature offering accommodation to those otherwise unable to afford or have the means to reside in a town centre locality.

In respect of housing delivery, the national planning guidance document Planning Policy Wales (PPW) acknowledges that there must be "sufficient sites suitable for the full range of housing types to address the identified needs of communities" (paragraph 4.2.12). Caerphilly County Borough currently has a severe shortage of this type of property and heavily relies on bed and breakfast accommodation to meet the shortfall. It is therefore considered that the proposal will assist with the provision of accommodation and contribute to meeting the needs of the community in line with Planning Policy Wales.

As with any proposal there should be no material harm to the amenity of existing, nearby residents by virtue of general disturbance, noise, or overlooking and the cumulative impact of such conversions must not adversely affect the amenity and/or character of the area. Within WGs practice guidance it is stated that issues can arise when there are concentrations of HMO's in a particular area. The research document suggested that 10% is a general 'tipping point' beyond which the evidence indicates that a concentration of HMOs can begin to have an adverse impact on the character and balance of a community.

This tipping point is described as a threshold beyond which a community can 'tip' from a balanced position in terms of demographic norms and impacts, towards a demographic that is noticeably more mixed in terms of shared and family households. It is estimated

there are around 200 licensed and unlicensed HMO's in the Caerphilly County Borough and that these are spread throughout the area. However, it is noted that Caerphilly CBC has no precise number of HMO's operating in CCBC, given that some are not required to be registered and many do not require the benefit of planning consent. Thus, it is prudent to regulate these uses through the planning system whilst there is opportunity. In that context, the Local Planning Authority is not able to argue that there is a 'high concentration' of Houses of Multiple Occupation in the immediate vicinity of the application site or within Caerphilly County Borough as a whole.

Taking into consideration the cumulative impacts of such HMOs within the Caerphilly County Borough and their widely dispersed placement, it is not considered that the proposed change of use in itself would significantly change the immediate character of Caerphilly or impact the current levels of amenity received by the neighbouring occupiers. Given there are no external alterations, and preservation of an attractive building frontage, this conversion has a lower visual impact on the street scene and sustains the character of the traditional terrace and established building lines. Therefore the proposal complies with the objectives of LDP Policy CW2.

Lastly, the Local Planning Authority must consider whether there are any adverse effects on local parking provision. The proposed change of use would reconfigure the internal layout and increase the capacity of the building to 4 No. bedrooms. The addition of 1 No. bedroom could lead to an increase in activities at the property over and above that which could occur with the lawful use of the building. However, it is conceivable that up to six residents, living as a single household, could live in the 3-bed property at present without the need for planning consent (if all bedrooms were doubles and occupied). Furthermore, a household with 2 adults and 2 adult siblings could also require 4 parking spaces and this is conceivable in a three bedroom property.

Policy CW3 states that development proposals should have regard for the safe, effective, and efficient use of the transportation network with parking provision provided in accordance with the CSS Wales Parking Standards 2014. The property has no off-street parking within its rear curtilage and therefore, occupants will rely on on-street provisions. Currently there are no separate parking standards for HMOs within SPG LDP5, such that the LPA takes a pragmatic approach in applying those for an equivalent bedroomed dwelling. The Councils Transportation and Engineering Manager (TEM) advises, "as a 3-bedroom property in a sustainable location, the dwelling would have a hypothetical requirement of 2 off-street car parking spaces. The same would apply for a 4-bed dwelling." Parking off-sets (points system) are applied as per the sustainability criteria outlined within schedule 6 of LDP5.

The TEM states "on this occasion we would raise no objection from a highway safety perspective. The residents of the HMO would only be entitled to apply for 2 residents parking permits overall, which would also apply to the existing 3-bed dwelling." The proposed occupants lie within the 16-18 year of range are unlikely to be car owners or have needs for private vehicle given the possibility for active modes of travel and access to frequent bus and train services. Given the above, and with further valuation of

parking demand along Broomfield Street, with regard to LDP Policy CW3 there are no grounds for a refusal.

In conclusion the proposal complies with LDP Policies CW2, Policy CW3 and Policy CW15 of the Caerphilly County Borough Local Development Plan up to 2021 - adopted November 2010, as such it is considered to be acceptable in planning terms. The application is recommended for APPROVAL, subject to standard planning conditions.

Comments from Consultees: Comments are addressed in the body of this report.

Comments from public: Matters raised by the objectors as summarised in the section entitled 'summary of observations' are addressed in turn below:

1. Neighbouring residents with small children should not have to live next door to this housing, with hostel rooms for ex-convicted criminals.

This matter is addressed within the main body of the officer report. There is no prejudice given to any specific group of occupant/end-user as this is not a material planning consideration, although a degree of attention is awarded to these matters. The planning system does not exist to protect the private interests of one person against the activities of another. Proposals should be considered in terms of their effect on amenity and existing use of land and buildings in the public interest.

2. The HMO/COU will impact the local housing market and devalue surrounding properties.

This is not a material planning consideration.

3. The application was not widely advertised.

The application was advertised in accordance with Part 12 of The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 via neighbour notification letters issued on 06/09/2023 and display of a site notice on 20/09/2023 affixed to post directly outside 17 Broomfield Street. In addition, the application is published on the Councils Weekly List which is circulated to Local Ward Councillors and other members and is also available via the Council website.

4. HMO with potentially 4 No. extra cars will add to the parking problem along Broomfield Street.

This matter is discussed within the main body of the report.

5. An HMO is not justified on this street - is there a need for an HMO in this area?

In respect of housing delivery, the national planning guidance document Planning Policy Wales (PPW) acknowledges that there must be "sufficient sites suitable for the full

range of housing types to address the identified needs of communities" (paragraph 4.2.12). Caerphilly County Borough currently has a severe shortage of this type of property and heavily relies on bed and breakfast accommodation to meet the shortfall. The proposal will assist with the provision of accommodation and contribute to meeting the needs of the community in line with PPW.

6. Occupants of this property can look directly into the living rooms and gardens of those next door and on the opposite side of the street with vulnerable, elderly, and young child occupants.

There are no external alterations, inclusive of extensions or new windows proposed in this property, with no new high-level vantage points. Therefore the degree of possibility to overlook adjacent properties remains unchanged. In this context, where properties are in a terraced building line, there is a mutual degree of overlooking between adjoining neighbours. Where properties front onto a public realm or are organised in opposing building lines separated by a highway, there is the possibility for the public to look into habitable room openings. It would be up to the occupant to ensure they have suitable means to secure privacy at ground level e.g. curtains, blinds/nets, or frosted vinyl's etc. The use of the application property for HMO purposes would have no different impact in that regard.

7. These street and surrounding back lanes are poorly lit at night which will encourage antisocial behaviour and criminal activity at this HMO.

It is accepted that a greater level of lighting in more private areas of the public realm can deter crime, although it is never entirely prevented.

The Local Planning Authority has a duty to consider crime and disorder implications under Section 17 of the Crime and Disorder Act 1998. Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and (b) the misuse of drugs, alcohol and other substances in its area; and (c) re-offending in its area; and (d) serious violence in its area. With respect to this application, there are no specific crime and disorder implications material to the determination of this application. Should crime occur, it would be the responsibility of the witness or those subject to criminal activity to alert the Police.

8. The HMO presents a safety issue to local children and there will not be enough policing.

There should be no adverse impacts to the safety of surrounding occupants, although due regard has been given to this matter (Section 17 of the Crime and Disorder Act 1998), this is not a material planning consideration in the determination of this

application. Police and Local Government hold joint leadership for community safety; however everyone has a civic duty to help the Police prevent crime and report crime.

9. This is an ideal family home in the town centre and will be lost to an HMO. The open housing market in this area is already limited.

The low concentration of HMOs as a total of the existing housing stock of the area means that the loss of one dwelling is not considered likely to have a material impact on housing stock or availability within this ward.

10. Residents gathering outside will intimidate locals walking along this street and trying to enjoy their own properties.

Please refer to the acknowledgements provided for points 7, 8 and 9.

11. Occupants pose a threat to security levels of property in this area - Criminals and offenders can directly trespass into surrounding properties.

Occupants are responsible for securing their own homes and can discuss this matter with the Police Architectural Liaison Officer (advice on Secured by Design principles). Please also refer to the responses given to points 7, 8 and 9.

12. Increased levels of noise and disturbance as a result of many occupants within one property.

Should this dwelling be occupied as a 3-bedroomed property, the maximum capacity could be six individuals. The no. of bedrooms is increased by 1 and as stipulated by D2 Prop Co. Ltd, single occupants are likely to be the prevalent end-user. It is acknowledged that HMOs are often different to other housing stock in regard to the transient nature of many tenancies, however as Welsh Government Planning Policy Wales cites there should be "sufficient sites suitable for the full range of housing types to address the identified needs of communities" (paragraph 4.2.12) and the proposal is deemed acceptable.

The addition of a bedroom to the property is not considered to have a material impact on surrounding residents. It is acknowledged that those living within an HMO are typically not previously known to each other and this may result in an intensification of use and related possibility of noise disturbance. The Environmental Health Officer (EVH) has reviewed the proposal and offers no objection to the development. The EVH department has separate powers to address issues of noise nuisance as and when they arise. It is also noted that the level of occupation is similar to what the house could accommodate at present without requiring any change of use.

This is an application for the change of use of a dwelling to a dwelling for use by persons not living as a single household and as stated above it is not considered that the proposal would materially affect the character of the area. Crime prevention and fear

of crime are social considerations and regard has been had to the proposal and impact on the local area and residents. It is however considered that as there is not a high concentration (i.e. 10% or more of properties in the area) of the existing housing stock being HMOs then the proposal will not have an unacceptable impact on the character of the area. Where anti-social behaviour does occur, responsibility for dealing with such anti-social behaviour is shared between a number of agencies, particularly the Police, local authorities and landlords. It is considered that existing legislative powers exist and can be enforced, should specific issues arise as is the case with other dwellings (including HMOs) in Caerphilly.

Other material considerations: The duty to improve the economic, social, environmental, and cultural well-being of Wales, has been considered in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015. In reaching the recommendation below, the ways of working set out at section 5 of that Act have been taken into account, and it is considered that the recommendation is consistent with the sustainable development principle as required by section 8 of that Act.

Future Wales - The National Plan 2040 was published on 24 February 2021 and forms part of the statutory development plan for the county borough. In addition to this Planning Policy Wales (PPW) has been amended to take account of Future Wales and PPW Edition 11 has also been published on 24th February 2021. In reaching the conclusion below full account has been taken of both Future Wales and PPW Edition 11 and where they are particularly pertinent to the consideration of the proposals they have been considered as part of the officer's report. It is considered that the recommendation(s) in respect of the proposals is (are) in conformity with both Future Wales and PPW Edition 11.

RECOMMENDATION that Permission be GRANTED

This permission is subject to the following condition(s)

- 01) The development hereby permitted shall be begun before the expiration of five years from the date of this permission.
REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990.
- 02) The development shall be carried out in accordance with the following approved plans and documents: Site Location Existing & Proposed Plans, Drawing No. 2953C; as received on 30/08/2023.
REASON: To ensure that the development is carried out only as approved by the Local Planning Authority.
- 03) The development shall not be occupied until covered and secure cycle parking facilities have been provided in accordance with a scheme that shall have been submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the development is accessible by all modes of transport in the interests of sustainability in accordance with policy CW3 of the adopted Caerphilly County Borough Local Development Plan up to 2021.

Advisory Note(s)

Please find attached the comments of the Council's Environmental Health Manager that are brought to the applicant's attention.

The proposed development lies within a coal mining area which may contain unrecorded coal mining related hazards. If any coal mining feature is encountered during development, this should be reported immediately to the Coal Authority on 0345 762 6848.

Further information is also available on the Coal Authority website at: www.gov.uk/government/organisations/the-coal-authority.