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COMMITTEE	Planning and Regulatory
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Application No.
P/20/0025

Date
4th February 2020

Determining Authority
MTCBC

Proposed Development

Location

Name & Address of Applicant/Agent

Engineering works including provision of drainage channel/swale and culvert/outflow, raising the level of the land and creation of site access road.

Former Ardagh Site
Dragon Parc
Abercanaid
Merthyr Tydfil

Huntley Wood Investments
c/o Asbri Planning Ltd
F.a.o. Mr L Griffiths
Unit 9 Oak Tree Court
Cardiff Gate Business Park
Cardiff



P/20/0025

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APPLICATION SITE

The application site, which is relatively flat and measures approximately 2.8 hectares, is irregular in shape and once formed part of the former Dragon Parc industrial site. It primarily consists of hardstanding areas and rubble following the demolition of buildings within the site. The only remaining building, located in the southern corner, links the application site to the main Hoover factory (to the east) via a footbridge across the River Taff and railway line.

The site is accessed from the south via a roundabout and adjoins the River Taff and remainder of the majority of the former industrial site to the east. The main Abercanaid access road bounds part of the western boundary along with a factory and a commercial storage business. To the north the site adjoins a small part of the old industrial site beyond which is another industrial building and commercial storage/parking facility.

A section of the River Taff embankment is included within the south eastern corner of the application site. The site is located within Zone C2 as defined by the Development Advice Maps (DAM). A primary trunk water main (of strategic importance) runs in close proximity to the application site.

PROPOSED DEVELOPMENT

The application primarily proposes engineering works to create a swale (i.e. a linear depression which transfers surface water overland to a discharge point). The swale would run along the western boundary of the site before culminating at the River Taff via a proposed culvert/outfall. The culvert would be created beneath the proposed access road and consist of two concrete box structures which would measure 2.4m high by 2.4m wide. They would have a maximum length of approximately 7.4m. The surface water would flow from the swale, via the culvert, down a proposed stepped block-stone cascade into the River Taff. Gabion baskets would support the sides of the outfall.

The swale itself would have a length of approximately 590m and a width of approximately 6m. The depth of the swale would vary, however, for the majority of its length would be shallow (less than 1m). As it reaches the culvert its depth increases to approximately 2.5m (albeit the sides of the swale would still be relatively gently sloping at this point). The road, where it crosses the culvert, would be lined with a timber post and rail specifically designed crash barrier. The steeper side slopes of the entrance to the culvert would also be secured by guard rails.

The proposal also includes other engineering works which mainly involve minimal raising of the level of the land. A small pond would also be created (15m x 15m x 1m deep) approximately half way along the western boundary.

The access road would measure approximately 120m in length and run in a straight line from the adopted highway (adjoining the roundabout), over the proposed culvert and to the boundary with the wider former industrial site. It would be 13m wide (including a 3.5m wide cycle path/footpath on the western side and a 1.5m wide cycle path on the eastern side). The remaining building and footbridge would be demolished to accommodate the proposed works.

The application has been supported by the following documents/reports:

- Coal Mining Risk Assessment (Integral Geotechnique January 2020)
- Desk Study Report (Integral Geotechnique February 2016)
- Site Investigation Report (Integral Geotechnique April 2019)
- Preliminary Ecological Appraisal (V3 Ecological Services Wales August 2020)
- Ecological Impact Assessment (V4 Ecological Services Wales September 2020)
- Nesting Bird and Bat Friendly Demolition Method Statement (V3 Ecological Services Wales October 2020)
- Arboriculture Report (July 2020)
- Construction Environmental Management Plan (CEMP) (September 2020 JBA)
- Flood Consequence Assessment (FCA) (Version 3 JBA February 2020)
- Hydraulic Model Update (Addendum to FCA JBA July 2020)
- Japanese Knotweed Management Plan (JBA October 2019)
- Planning Design and Access Statement (Asbri Planning - December 2018)
- Demolition Method Statement (Bond Demolition November 2019)
- Pre-application Consultation Report (PAC) Report (Asbri - November 2018)

PLANNING HISTORY

P/16/0039 - Demolition of Former Hoover/Candy Office Block and Footbridge - Prior Approval not required 1st March 2016.

P/17/0144 - Residential and business (Class Use B1) development (Outline) - Not yet determined.

CONSULTATION

Engineering and Traffic Group Leader:	No objection.
Planning Division's Ecologist:	No objection subject to conditions.
Planning Division's Landscape Architect:	No objection.
Environmental Health Manager:	No response received.
The Coal Authority	No objections subject to conditions.
Natural Resources Wales (NRW):	No objection subject to conditions.
Welsh Water:	No objection subject to conditions.

PUBLICITY

In accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, letters were sent to the adjoining (and neighbouring) properties and site

notices were displayed within the vicinity of the site. A press notice was also published in the local newspaper.

No letters of objection were received following this publicity exercise.

POLICY CONTEXT

National Policy

Planning Policy Wales (PPW) Edition 10 (December 2018) sets out the land use policies of the Welsh Government. The most relevant paragraphs are:

Paragraphs 3.3 – 3.16 set out the principles of good design in new development proposals, which should take into account its relationship to its surrounding context.

Paragraph 3.51 notes that previously developed land wherever possible should be used in preference to greenfield sites where it is suitable for development.

Paragraphs 6.4.21 – 6.4.23 note that local authorities should seek to maintain and enhance biodiversity and build resilient ecological networks to ensure that any adverse environmental effects can first be avoided, mitigated or compensated. Regard should also be given to any potential impacts on protected species that may result in disturbance or harm to the species or its habitat.

Paragraph 6.6.23 – The continued construction of hard engineered flood defences to protect development in areas of floodplain is not sustainable.

6.6.24 – Development Advice Maps enable planning authorities to take a strategic approach to flood risk and consider the catchment as a whole by providing preliminary representation of flood risks, which inform decisions on the location of new development and the requirements necessary to support any applications which may be proposed.

Paragraph 6.9.1 – Understanding the barriers to unlocking the potential of places, including the transformation or regeneration of an area or the development of a single site, is a key part of achieving sustainable places. Barriers could include dereliction or risks such as flooding, land contamination or instability.

Paragraph 6.9.16 – Whenever development or re-development potential exists the planning system will be the preferred means of addressing potential land contamination.

Paragraph 6.9.25 states that planning decisions will need to take into account; the potential hazard that instability could create to the development itself, to its occupants and to the local environment; and, the results of a specialist investigation and assessment by the developer to determine the stability of the ground and to identify any remedial measures required to deal with any instability.

Paragraph 6.9.27 states that where acceptable measures can overcome instability, planning permission may be granted subject to conditions specifying the necessary measures. If instability cannot be overcome satisfactorily, the authority may refuse planning permission.

The policies in PPW are supported by Technical Advice Notes (TANs). The most relevant TANs to this application are as follows:-

TAN 5 - Nature Conservation and Planning sets out the role of the planning system in protecting and enhancing biodiversity and geological conservation.

TAN15 - Development and Flood Risk

TAN 18 - Transport describes how to integrate land use and transport planning. It explains how transport impacts should be assessed and mitigated.

Local Policy

Merthyr Tydfil County Borough Council Replacement Local Development Plan (LDP) 2016-2031:

Policy SW4 – Settlement boundaries

Policy SW6 – Hoover Strategic Regeneration Area

Policy SW11 – Sustainable design and Placemaking

Policy SW12 – Improving the Transport Network

Policy EnW1 – Nature Conservation and Ecosystem Resilience

Policy EnW2 – Internationally and Nationally Protected Sites and Species

Policy EnW3 – Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species.

Policy EnW4 – Environmental Protection

The following Supplementary Planning Guidance (SPG) are also relevant:

SPG Note 4 – Sustainable Design

SPG Note 5 – Nature and Development

PLANNING CONSIDERATIONS

The application site lies within the settlement boundary where the majority of new development is encouraged and generally supported by Policy SW4 of the LDP. The site is also situated within the Hoover Strategic Regeneration Area (Policy SW6) which is a key regeneration site for the County Borough. The concept plan attached to this policy points out that the application site, combined with the wider cleared industrial site (Dragon Parc), could be a future potential residential site. However, the reasoned justification for Policy SW6 identifies that the Dragon Parc site is located within flood zone C2. Therefore, highly vulnerable development (such as residential development) should not be permitted. This application has been specifically submitted in an attempt to overcome the current flooding issue to enable a mixed residential/business development.

Given the above, the main considerations of this application would be:

- The flooding consequences of the proposed development;
- The impact on a primary trunk water main of strategic importance;
- The visual appearance of the development;
- Ecological issues;

- Highway safety issues; and
- The impact on neighbouring properties.

The Flood Consequences of the Proposed Development.

Although the proposal itself does not fall within any of the vulnerability categories as highlighted in TAN15 and is therefore acceptable in a C2 flood zone, the reason for the development is to enable the owner/developer to seek a flood map challenge to the DAM. If successful, the DAM would be updated and the site removed from the C2 flood zone. However, currently for any change to the DAM to be approved the works (subject to this application) have to be completed and approved by NRW. If these series of events are successful, subject to the details submitted with any future application(s), residential/business development on the Dragon Parc site is likely to be acceptable.

To the west of the Dragon Parc site is a small 'Ordinary Watercourse' called the Nant Canaid. It enters a culverted system which roughly follows the western boundary of the application site before it discharges into the River Taff. As pointed out in the FCA '*when the Nant Canaid channel and culvert inlet capacity is exceeded the Dragon Parc site is at risk of flooding*'. The engineering proposals subject of this application seek to mitigate against the flood risk posed by the Nant Canaid.

NRW has considered the FCA and other information (e.g. flood modelling) submitted in support of this application and raised no objection to the proposal subject to the development being carried out in accordance with the FCA (and associated drawing). NRW have also requested conditions to deal with contamination and external lighting.

Given the above, it is considered that the proposal complies with policy EnW4 of the LDP.

The impact on a primary trunk water main of strategic importance

Welsh Water has highlighted that a primary water main (as well as other sewers), which is of strategic importance, is in close proximity to the application site. Therefore there is a concern that the proposed development could have an adverse impact due to additional loading on this asset. In addition, the raising of the levels of the land may have impacts on any future maintenance of the water main/sewers. Without knowing the exact depth/location (and thus the method of protection required) of the assets Welsh Water are unable to confirm whether the proposal would have any detrimental impact. The developer/owner has been asked to undertake a site investigation (which would include trial holes to accurately locate the assets) but to date no such evidence has been submitted. Although negotiations are ongoing, Welsh Water has recommended conditions, which could be attached to any permission, requiring site investigations to be undertaken to accurately locate the assets and provide a scheme to secure their long-term protection. Given the above, the proposal is considered acceptable subject to the recommended conditions.

The visual appearance of the development

The site is derelict, unsightly and, although somewhat hidden by existing buildings and landscaping, can be seen from surrounding viewpoints. The introduction of a swale (and associated landscaping and a pond) would undoubtedly have a positive impact on the appearance of this part of the Dragon Parc site. The access and culvert would have a greater

visual impact. However, the culvert would be predominantly masked by the proposed road and is a feature that is often found adjacent to river embankments. Although it may be initially obvious in the landscape (particularly when viewed from the opposite site of the river on the main Hoover site), overtime this part of the river embankment would regenerate and the visual impact of this part of the development would naturally diminish. As highlighted in PPW, such barriers to unlock the potential of regenerating a site (such as Dragon Parc) have to be understood and are key parts in achieving sustainable places. It is also noted that the demolition of the remaining derelict building and footbridge would also have a positive impact on the visual appearance of the area. Given this, the proposal complies with Policy SW11 of the LDP.

Ecology

As stated above, the application has been supported by a number of reports which have assessed the impact of the development on a number of species (including Otter, bats, reptiles, birds and the Great Crested Newt) and their habitats. A number of mitigation/protection measures are highlighted in the reports along with a series of enhancements. The enhancements include the managed removal of Japanese Knotweed within the site, the seeding of the swale with a wetland meadow mixture (subject to details submitted via a landscaping condition), the provision of an artificial Otter holt in the river bank (close to the culvert outfall) and the siting of 10 bat and 10 bird boxes within the trees along the western boundary of the site. Having regard to the assessments undertaken and enhancements/mitigation measures being put forward with this application, the Council's Ecologist raises no objection to the scheme. As such, the proposal complies with policy EnW1 of the LDP.

Highway Safety

The Engineering and Traffic Group Leader has raised no objection to the creation of a new access to serve the site. The surrounding road network is also suitable to cater for the construction traffic required to carry out the development. Once completed the development would result in minimal traffic movements. As such the proposal complies with Policy SW11 of the LDP.

The impact on neighbouring properties

It is noted that there have been no objections to the proposed development following the publicity exercise undertaken. However, there is inevitably going to be some noise and disturbance as a result of the construction phase of the development. Therefore, it would be pertinent to attach a condition to any permission which restricts construction activities to sociable hours.

Conclusion

The development of this proposal is essential to aid any future aspirations for the regeneration/residential development of the wider Dragon Parc site. Any future development proposal(s) will clearly be subject to another planning application(s) which will be determined on its own planning merits. The proposal, along with the recommended ecological enhancements, would enable a sustainable method of flood management which would have positive impacts. As such, the application is recommended for permission.

Finally, the duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 (“the WBFG Act”) has been taken into consideration when determining this application. In reaching the following recommendation, the ways of working set out at section 5 of the WBFG Act have been considered and thus the proposal is in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers well-being objectives set out as required by section 8 of the WBFG Act.

Accordingly the following recommendation is made:

RECOMMENDATION: BE APPROVED subject to the following CONDITIONS

1. The development shall begin not later than five years from the date of this decision.

Reason - To comply with Section 91 of the Town and Country Planning Act 1990.

2. The development shall be carried out in accordance with the following approved plans and documents:

General arrangement plan and long sections (BMQ-JBAU-XX-XX-DR-C-0001 Rev. P05)

Site Sections (Sheet 1 of 2) (BMQ-JBAU-XX-XX-DR-C-0002 Rev. P04)

Site Sections (Sheet 2 of 2) (BMQ-JBAU-XX-XX-DR-C-0003 Rev. P03)

Road plan sections and details (BMQ-JBAU-XX-XX-DR-C-0010 Rev. P03)

Road Section (BMQ-JBAU-XX-XX-DR-C-0011 Rev. P03)

Site Entrance (BMQ-JBAU-XX-XX-DR-C-0012 Rev. P01)

Outfall plan (BMQ-JBAU-XX-XX-DR-C-0020 Rev. P02)

Road and Outfall Elevation (BMQ-JBAU-XX-XX-DR-C-0021 Rev. P02)

Coal Mining Risk Assessment ref. 12392/LP/20/CMRA (Integral Geotechnique January 2020)

SI Desk Study Report ref. 11708/LW/16/DS (Integral Geotechnique February 2016)

SI Report ref. 12392/LW/19/SI (Integral Geotechnique April 2016)

Preliminary Ecological Appraisal (V3 Ecological Services Wales August 2020)

Ecological Impact Assessment (V4 Ecological Wales September 2020)

Nesting Bird and Bat Friendly Demolition Method Statement (V3 Ecological Services Wales October 2020)

Arboriculture Report (July 2020)

Construction Environmental Management Plan Ref. BMQ-JBAU-XX-XX-RP-EN-0001-S3-P01-CEMP (September 2020 JBA)

FCA Ref. BMQ-JBAU-XX-XX-RP-HM-0001-S3-P03-FCA (Version 3 JBA February 2020)

Hydraulic Model Update (Addendum to FCA) (2019s0875 JBA July 2020)

Japanese Knotweed Management Plan Ref. BMQ-JBAU-XX-XX-RP-EN-0002-S3-P01-KMP (JBA October 2019)

Demolition Method Statement (Bond Demolition November 2019)

Timber crash barrier details received on 13/10/20

Reason -To ensure compliance with the approved plans and clearly define the scope of the permission.

3. **No development or site clearance shall take place** until there has been submitted to and approved in writing by the Local Planning Authority a scheme of landscaping. The scheme shall include indications of all existing trees (including spread and species) and hedgerows on the land, identify those to be retained and set out measures for their protection throughout the course of development.

Reason - To ensure that the new development will be visually attractive in the interests of amenity and to accord with Policy SW11 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

4. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

Reason - To ensure that the new development will be visually attractive in the interests of amenity and to accord with Policy SW11 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

5. **No development shall take place** until a 5 year (post development) habitat and landscape management plan, including management responsibilities and maintenance schedules for all habitats/landscaped areas, has been submitted to and approved in writing by the local planning authority. The habitat and landscape management plan shall be carried out as approved.

Reason - To maintain and enhance biodiversity and habitats in accordance with Policies SW11, EnW1 and EnW2 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

6. **No development shall take place** until a site investigation to accurately locate the public strategic watermain has been carried out. The results of the site investigation shall be submitted to and approved by the local planning authority before any development takes place.

Reason - To ensure that the proposed development does not affect the integrity of the public water supply system in the interests of public health and safety.

7. Following approval of the results of the site investigation (as required by condition 6) and **before any development takes place**, a scheme to secure the protection of the structural condition of the watermain during and following the development, hereby permitted, shall be submitted to and approved in writing by the local planning authority. The scheme shall include a programme of implementation for any protection works and the development shall only be carried out in accordance with the approved protection scheme which shall be retained in perpetuity.

Reason - To ensure that the proposed development does not affect the integrity of the public water supply system in the interests of public health and safety.

8. **No development shall commence** until a scheme to protect the structural condition of the combined sewers crossing the site have been submitted to and approved in writing by the Local Planning Authority. The scheme shall provide for any protection measures during construction and completion phases of the development. The scheme shall demonstrate the distance and relationship of the proposed development with the sewers crossing and include a detailed design, construction method statement and risk assessment outlining the measures taken to secure and protect the structural condition and ongoing access of the sewers. No other development pursuant to this permission shall be carried out until the approved protection measures have been implemented and completed. The approved scheme shall be adhered to throughout the lifetime of the development and the protection measures shall be retained in perpetuity.

Reason - To ensure that the proposed development does not affect the integrity of the public sewerage system in the interests of public health and safety.

9. No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network.

Reason - To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

10. **Prior to the commencement of development**, the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

1. A preliminary risk assessment which has identified:

- (a) All previous uses
- (b) Potential contaminants associated with those uses
- (c) A conceptual model of the site indicating sources, pathways and receptors
- (d) Potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. Based on the site investigation results and the detailed risk assessment (2) an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The development shall be carried out in accordance with the approved details.

Reason - To protect the controlled waters at this site which are of high environmental sensitivity due to proximity of surface watercourses (the River Taff forms the eastern boundary of site) and underlying Secondary A Aquifer in accordance with Policy EnW4 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

11. **Prior to commencement of development**, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the Local Planning Authority.

Reason - To protect the controlled waters at this site which are of high environmental sensitivity due to proximity of surface watercourses (the River Taff forms the eastern boundary of site) and underlying Secondary A Aquifer in accordance with Policy EnW4 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

12. Reports on monitoring, maintenance and any contingency action carried out in accordance with a long-term monitoring and maintenance plan shall be submitted to the Local Planning Authority as set out in that plan. On completion of the monitoring programme a final report demonstrating that all long-term site remediation criteria have been met and documenting the decision to cease monitoring shall be submitted to and approved in writing by the Local Planning Authority.

Reason - To protect the controlled waters at this site which are of high environmental sensitivity due to proximity of surface watercourses (the River Taff forms the eastern boundary of site) and underlying Secondary A Aquifer in accordance with Policy EnW4 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

13. If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until the developer has submitted and obtained written approval from the Local Planning Authority for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with.

Reason - To protect the controlled waters at this site which are of high environmental sensitivity due to proximity of surface watercourses (the River Taff forms the eastern boundary of site) and underlying Secondary A Aquifer in accordance with Policy EnW4 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

14. Prior to its installation, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. The Lighting Plan should include:

- Details of the siting and type of external lighting to be used.
- Drawings setting out light spillage.
- Details of lighting to be used both during construction and/or operation.

The lighting shall only be installed in accordance with the approved details.

Reason - To limit the impact on protected species and reduce light pollution in accordance with policies EnW2 and EnW4 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

15. **No development shall commence** until intrusive site investigations have been carried out to establish the exact situation in respect of coal mining legacy features. The findings of the intrusive site investigations shall be submitted to and approved in writing by the local planning authority before development commences.

Reason - The site may be unstable and as such in the interests of safety remedial measures may need to be carried out.

16. If the intrusive site investigations (as required by condition 15) identify that coal mining legacy on the site poses a risk to surface stability, no development shall commence until a detailed remediation scheme to protect the development from the effects of such land stability has been submitted to and approved in writing by the local planning authority. Any remedial works shall be implemented in accordance with the approved details.

Reason - The site may be unstable and as such in the interests of safety remedial measures may need to be carried out.

17. Before the gabion baskets, hereby permitted, are installed details of the material to be used to fill the baskets shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason - To ensure that the new development will be visually attractive in the interests of amenity and to accord with Policy SW11 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

18. Demolition or construction works shall not take place outside the hours of 08:00 to 18:00 Mondays to Fridays and 09:00 to 14.00 on Saturdays and at no time on Sundays or Public Holidays.

Reason - To ensure that the noise emitted/activities are not a source of nuisance to occupants of nearby properties in accordance with Policies SW11 and EnW4 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

INFORMATIVES

1. Natural Resources Wales (NRW) have recommended the following:
 1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
 2. Refer to Environment Agency document 'Guiding Principles for Land Contamination' for the type of information that NRW require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health. Refer to Groundwater protection: Principles and practice (GP3).