



FORMER ST TYDFILS HOSPITAL, MERTHYR TYDFIL CF47 0SJ

HERITAGE IMPACT ASSESSMENT

JULY 2020

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1.0 PURPOSE OF STATEMENT

This document has been prepared as a working draft to accompany the pre-application submission in respect of the potential impact of proposed development of the former St Tydfil's Hospital site on the remaining listed building on the site and the Thomastown Conservation Area.

The remaining building is in poor condition and comprises the entrance block, listed Grade II in January 1988. In addition there is a statue in the forecourt to the west which is separately listed Grade II, also in January 1988. The list descriptions can be found in Appendix 1.

The Thomastown Conservation Area includes the statue but not the building and wraps around the west, south and east sides of the site. The conservation area was first designated in 1978 and appraised and extended in 2014. The conservation area map can be found in Appendix 2.

The proposed development comprises the redevelopment of this derelict site in the centre of Merthyr Tydfil with 64 new build units and 7 units within the conversion of the listed building and a new build 2 storey cottage extension to the south.

Throughout this report, consideration has been given to Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990: *"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and also Section 72: *"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability preserving or enhancing the character or appearance of that area."*

This assessment focusses on the impact of the proposals on the architectural and historic interest of the listed buildings and the character and appearance and setting of the conservation area and has been provided in accordance with the requirements of the Planning Policy Wales (PPW) paragraph 6.1.13:

"Applicants for listed building consent must be able to justify their proposals, show why the alteration or demolition of a listed building is desirable or necessary and consider the impact of any change upon its significance. This must be included in a heritage impact statement, which will be proportionate both to the significance of the building and to the degree of change proposed."

The CADW guidance documents "Heritage Impact Assessment in Wales" (May 2017) and "Setting of Historic Assets in Wales" (May 2017) have been followed in production of this report.

The Glamorgan-Gwent Historic Environment Record has been accessed via Archiwilio. This references the two listed buildings already noted and the Merthyr Tydfil Historic Landscape. Reference to previous consultations from Glamorgan Gwent Archeological Trust notes the potential for Roman activity in the vicinity.

This report has been prepared by Katharine Metcalfe IHBC of K Metcalfe Heritage Limited, an appropriately qualified and experienced Heritage professional. Opinions expressed have been reached through primary research, site visits, and reference to previous reports by others.

Unless otherwise stated, all plans reproduced in this document are courtesy of Spring Design Ltd. Unless otherwise stated, all photographs were taken by the author on 23 March 2020 or by others on 19 June 2019.

2.0 EXECUTIVE SUMMARY

The aim of this Heritage Impact Assessment has been to understand the significance of the historic assets in and near the redevelopment site and to assess the potential impact of the proposals.

The site has been vacant for nearly a decade and all but one of the unlisted buildings associated with the former workhouse were demolished by 2015. Since then, the site and listed building have seen deteriorating.

The assessment has been carried out in accordance with the methods described in the CADW document "Heritage Impact Assessment in Wales" (May 2017) and their document "Setting of Historic Assets in Wales" (May 2017) has also been followed.

The significance of the listed building has been identified as having high aesthetic and communal values and medium evidential and historic values. The overall setting makes a negative contribution to the significance.

The impact of the proposed restoration of the building and redevelopment of this site has been assessed to be generally positive, with benefits to the architectural and historic interest of the listed building and the character and appearance of the wider historic environment.

PPW puts great weight on the delivery of sustainable development that improve the social, economic, environmental and cultural wellbeing of Wales.

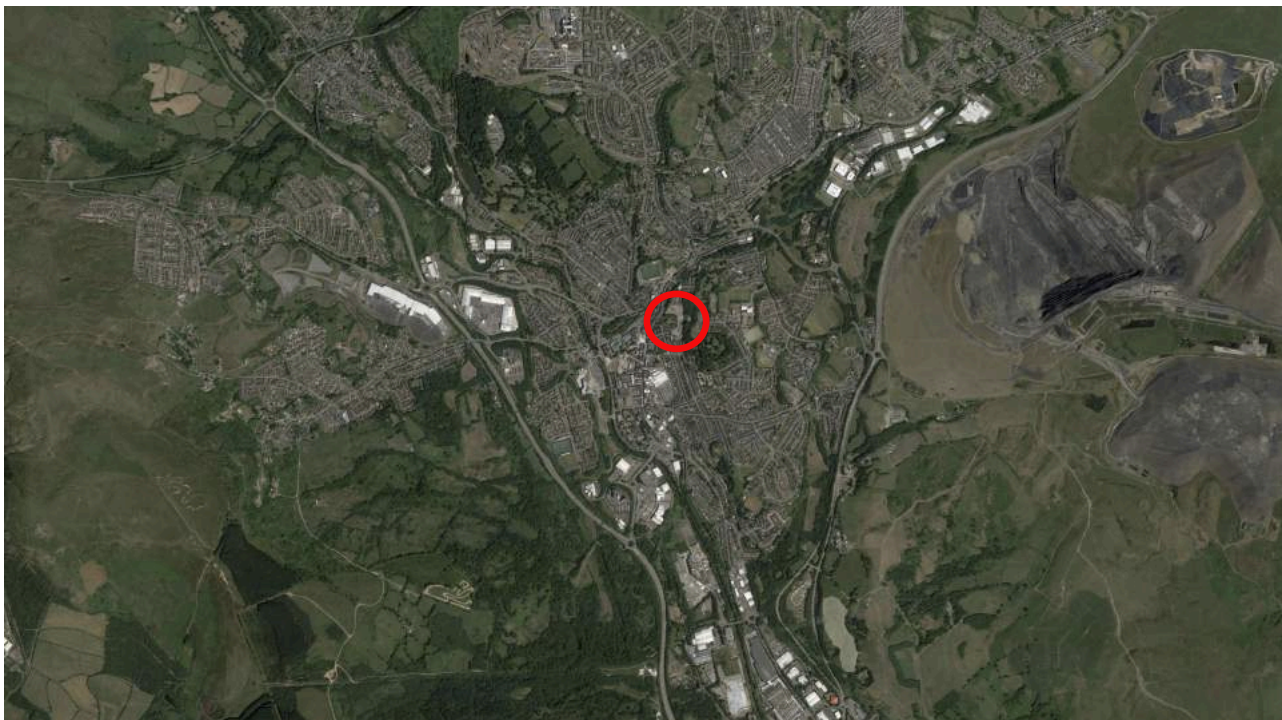
The proposed development will meet these objectives through the redevelopment of a town centre brownfield site for housing, the restoration and re-use of a redundant listed building and the re-landscaping of the brownfield site and provision of and links to existing green spaces, providing wildlife corridors between existing parks.

The public benefits of the proposals will enhance the historic environment and will provide housing in a sustainable location that will benefit the town and wider area.

Due to the COVID-19 restrictions in place at the time of compilation of this report, it is primarily a desk-based report made with no access to Record Office sources.

3.0 LOCATION AND DESCRIPTION OF THE SITE

The site of the former St Tydfil's Hospital lies approximately 180m east of Penderyn Square in Merthyr Tydfil.



The site is U shaped around the Old Cholera Cemetery (now a public open space) and is approximately 5 acres, orientated on a north-south axis. The existing road access is from Upper Thomas Street, to the south west of the site, with both listed buildings located in this access area.

The site is relatively level, with a fall of just 3m from north to south and 7m east to west. However the easternmost section amongst the trees is up a steep cliff and lies some 8m above the rest of the site.

Other than the listed structures, an adjoining unlisted wing and one remaining unlisted building to the south of the site, all other buildings have been demolished in the last few years although the rubble has not been cleared so now presents as an opportunity site ready for further development.





Front elevations of the listed block from Union Street and up Union Place



View of the rear of the listed building



Views within the site south towards the listed building

4.0 HISTORY OF THE SITE

The former St Tydfil's Hospital was constructed between 1851 and 1853 as the Thomas Street Workhouse.

The origins of workhouses can be traced to the Ordinance of Labourers of 1350, which was issued the labour shortages following the Black Death in England by restricting the movement of labourers, which ultimately led to the state becoming responsible for the support of the poor.

The Poor Law Act was issued in 1597 and the system developed and evolved over time but by the early 1830's it was proving to be unsustainable and the New Poor Law of 1834 discouraged the provision of relief to anyone who refused to enter a workhouse.

Merthyr Tydfil was one of the areas that showed considerable resistance the New Poor Law and to the erection of a union workhouse and contrary to the wishes of the Poor Law Commissioners, also persisted in giving out relief in the form of money. It was not until 1848 that the Board of Guardians were persuaded to undertake the building of a workhouse, however for various reasons, including the cholera epidemic, the building was not started until the early 1850's, with the front block dating to 1870..

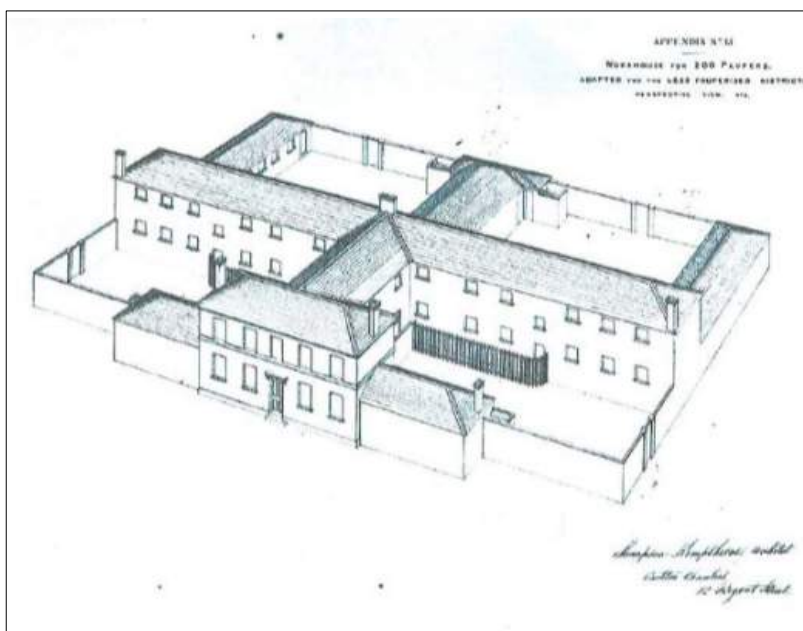
Life in a workhouse was intended to be harsh to ensure that only the truly destitute would apply. But the provision of free medical care and education for children meant that workhouse inmates were often advantaged over the general population; a dilemma that the Poor Law authorities never managed to reconcile. Most inmates were employed on menial tasks such as breaking stones or crushing bones to produce fertiliser.

Sampson Kempthorne was a London based architect who specialised in the design of workhouses. His first two designs were the square plan and the hexagonal, or Y plan. Both contained separate wings for the different classes of inmates (men, women, boys, girls and infirm) that radiated from a central hub. The ground in between the wings was used as exercise yards and the designs both provided utility buildings around the perimeter and an administration block at the main entrance. He subsequently designed a more basic version of the square plan which was known as the "200 pauper" plan; this lacked the central hub and was for use in rural areas where pauper numbers were generally lower.

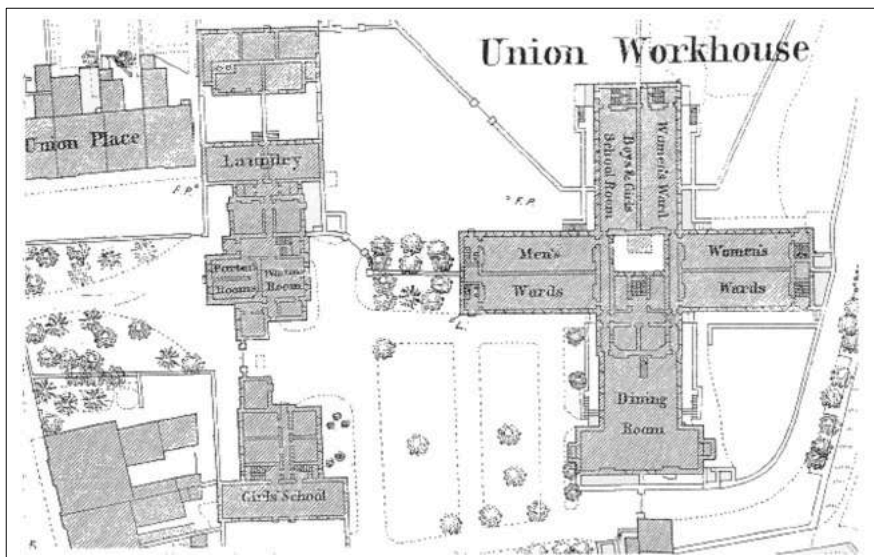
The Thomas Street Workhouse was designed by Aickin and Capes of Islington and certainly follows elements of the design of the 200 pauper plan, comprising an entrance block and cross wings behind.

As the 19th century wore on, workhouses increasingly became refuges for the elderly, infirm and sick rather than the able-bodied poor, and in 1929 legislation was passed to allow local authorities to take over workhouse infirmaries as municipal hospitals. Although workhouses were formally abolished by the same legislation in 1930, many continued under their new appellation of Public Assistance Institutions under the control of local authorities. It was not until the National Assistance Act of 1948 that the last vestiges of the Poor Law disappeared and, with them, the last workhouses.

Thomas Street Workhouse became the Tydfil Public Assistance Institution in 1930 and St Tydfil's Hospital after its association with the National Health Service in 1948.



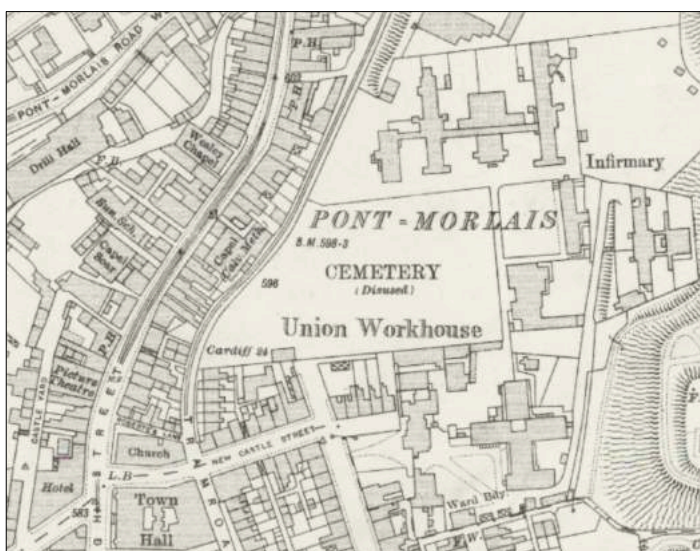
Samuel Kempthorne's "200 Pauper" prototype Plan, used as a basis for many Workhouse plans at the time



Layout plan of the Union Workhouse shortly after completion (around 1870)



1897 OS 25 inch map showing the layout of the buildings with the infirmary to the north



1915 OS 25 inch map. The infirmary has been extended and additional buildings constructed on the site.

The Hospital closed in 2012 and most of the buildings on the site, other than the listed front block and a building on the south boundary, were demolished in 2015.

5.0 ASSESSMENT OF THE HISTORIC ASSETS

The significance of any historic asset lies in its heritage values, derived from its evidential, historical, aesthetic and communal values, which are the values that elevate it from being merely interesting to being worthy of formal designation. These headings are defined in Conservation Principles (CADW, March 2011) and further expanded upon in their document Heritage Impact Assessment in Wales as:

Evidential value: the extent to which the physical fabric tells how and when your historic asset was made, how it was used and how it has changed over time. There may be buried or obscured elements associated with your historic asset which may also be an important potential source of evidence.

Historical value: your historic asset may illustrate a particular past way of life or be associated with a specific person or event; there may be physical evidence for these connections which it could be important to retain

Aesthetic value: the design, construction and craftsmanship of your historic asset. This can also include setting and views to and from the historic asset, which may have changed through time.

Communal value: your historic asset may have particular significance to people for its commemorative, symbolic or spiritual value, or for the part it has played in local cultural or public life. This will be particularly important in the case of buildings in public use or sites where public access must be maintained or improved.

Whilst not a heritage value in its own right, the setting of an historic asset is the surroundings in which it is experienced and elements of this setting may contribute to its significance.

Setting is defined in the CADW document "The Setting of Historic Assets in Wales" as

The setting of a historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive, negative or neutral contribution to the significance of an asset.

Setting is not itself a historic asset, though land within a setting may contain other historic assets. The importance of setting lies in what it contributes to the significance of a historic asset.

Setting often extends beyond the property boundary of a historic asset and into the surrounding landscape or townscape. Although many historic assets are visible and their settings are obvious, those that are buried also have a setting.

The setting of a historic asset can include physical elements of its surroundings. These may be boundary walls, adjacent fields or functional and physical relationships with other historic assets or natural features. For example, the setting of a listed farmhouse might be its physical agricultural surroundings, both built and landscape features such as buildings, boundaries or fields. Equally, the setting of a scheduled industrial steam engine house might be its associated industrial landscape of quarries, tramways or waste heaps.

The setting of a historic asset can also include less tangible elements. These may include function, sensory perceptions or historical, artistic, literary and scenic associations.

Although views to and from a historic asset are often the most obvious factors, other sensory elements can also affect setting — for example, the noise from a road set in a cutting, noise intrusion from above such as aircraft or drones, or the sounds and smells of a new industrial process in an existing building. Such elements can be more subjective and more difficult to assess than physical factors, but might also contribute to the setting of a historic asset.

The setting of a historic asset is not fixed and may change through time as the asset and its surroundings evolve. These changes may have a negative impact on the significance of an asset; for example, the loss of the surrounding physical elements that allow an asset to be understood or the introduction of an adjacent new development that has a major visual impact. But changes can also have a positive impact that may enhance the setting, such as the removal of traffic from part of a historic town or the opening up of views, or the return of a sense of enclosure to sites where it has been lost.

Considering these values, an assessment of the significance of the front block of the former St Tydfil's Hospital, the statue in the forecourt and the Thomastown conservation area is made below.

Evidential Value. The front block of the former workhouse is in Decorated Gothic style, perhaps unexpectedly for a building of this nature, and it contains a host of architectural detailing in the stonework providing additional interest. According to the early layout plan above, the ground floor contained the laundry to the north, and the porters and wardens rooms in the central section, however it is not known what the upper floors would have been used for, although the exposed cruck beams and tall traceried windows suggest that there may have been a double height chapel at this level. Part of the evidential value of the building has been lost with the demolition of the associated workhouse building, however it still retains interest in the partial understanding of the former site.



Historical value. The historic value retained by this remaining element of the Union Workhouse is medium; it relates to a specific period of history that can be traced throughout the British Isles, but the listed building represents just a small part of this former site. however it remains an important piece in the jigsaw of Merthyr Tydfil's past.

Aesthetic value: As stated, notwithstanding its dilapidated state and the poor quality extension to the south, the building retains architectural features of interest in its stone detailing. The aesthetic interest is considered to be high.



Communal value: The site is in the centre of modern Merthyr Tydfil and has played its part in many stages of the towns history, from its days as the workhouse, through the Cholera epidemics and as the local hospital. These events place it firmly in the community and whilst the site is now empty and the listed building in a poor state, there will be a strong community desire to see it being restored and re-used for local people.

Setting: The listed building suffers from a poor setting, with the experience of the building being compromised by the demolished buildings, the hoarding and the condition of the building itself. However the wider conservation area is attractive and well kept and the park is a welcome green space. The site is an eyesore and as such, the setting makes a negative contribution to the overall significance of the building and to the wider area.

The statue and plinth of Sir W T Lewis is a listed structure to the north of the forecourt of the front block and within the development site. William Lewis was born in 1837 in Merthyr Tydfil, the second son of Thomas William Lewis, an engineer in Plymouth. He was educated at a local school and was apprenticed to his father as an engineer at the age of thirteen.

In 1855 Lewis was appointed as an assistant to W. S. Clark, the chief mining engineer of the John Crichton-Stuart, 3rd Marquess of Bute (1847–1890). He spent ten years in that post before succeeding Clark in 1864. Lewis was given the occupancy of Mardy House as part of his job, which became his long-term residence in Aberdare.

He at first worked for the Bute coal mining pits in southern Wales, but between 1870 and 1880 he acquired his own pits in Rhondda, which became known as Lewis Merthyr Consolidated Collieries Limited. He was also the founder of the Monmouthshire and South Wales Coal Association as a response the growing strength of the trade unions.

Although the statue was re-located to this site from its original position outside the General Hospital on Penydarren Road, it holds historic and communal value for its subject and his links to the town.



The current setting is poor and the statue is barely experienced from anywhere outside the site.

The Thomastown conservation area incorporates the front forecourt, inclusive of the statue, but does not include the listed building or remainder of the site.; The map extract from the conservation area appraisal below shows the boundary in red, with the site marked in green.



This part of the conservation area is the Georgian Character Zone and is described in the conservation area appraisal document as:

This character area is dominated by Georgian-style terraced dwelling houses. It is likely that most of these dwellings were built in the early Victorian period but are characterised as having a 'Georgian' style designs. For example the vast majority of houses in this area do not benefit from bay windows and are built immediately on the back of the highway and have heavy-set detailing around the doorways. This area including Church Street is considered to be the first wave of purpose-built suburban housing in the area. Some of the properties are double fronted and most of them contain similar door-surround moulding features which is distinctive to this area of Merthyr Tydfil. The majority of the properties are finished with coloured render, usually pastel shades, creams and whites.

There is a requirement in the Act for development to preserve or enhance the character and appearance of a conservation area and this can include development nearby that could impact upon it. As stated above, the current dilapidated state of both the site and the listed building negatively impact on the character and appearance of the conservation area.

To conclude, the significance of the principal listed building is:

Evidential Value - Medium. Physical changes to the asset and loss of the associated buildings have eroded this value.

Historical Value - Medium. Because most of the buildings that made up the original workhouse are lost, the listed building represents just a small part of this former site. However it remains an important piece in the jigsaw of Merthyr Tydfil's past.

Aesthetic Value - High. Notwithstanding its dilapidated state, the building retains architectural features of interest in its stone detailing.

Communal Value - High. The town centre location and former use as the main hospital will create a sense of community interest in the site and building.

The setting currently makes a negative contribution to the significance, but could easily be improved to provide a positive contribution.

The proposed development covers the wider site and the listed building and provides 64 new dwellings on the to the north and west site and 7 apartments within the converted listed building, plus a new 2 storey cottage directly adjacent to the listed building in place of the unlisted attached building (to be demolished).

The units are arranged as terraces, semi detached and detached dwellings with feature buildings at key locations to provide points of interest within the site.

The restored listed building will provide the focal point at the entrance to the site and the proposed new cottage adjacent will provide the visual transition to the new development beyond through the choice of materials.

Site key

- Red line: Site Boundary
- Blue line: 1.8m High coloured timber fence
- Green line: Front garden hedge behind 500mm high black steel railings external stone dwarf wall
- Yellow circle: Indicates the removal of existing trees

Surfaces key

- Public realm hard surfacing materials
- Private realm hard surfacing materials
- Soft lawn recreation feature
- Public realm landscaped areas
- House front gardens
- Private rear gardens

Tree key

- Tree Survey No.
- Species
- Height
- Condition
- Location
- Notes

Perimeter Boundary Treatments

- Existing road & footpath to be retained and made good
- Existing walls & railings to be retained and made good
- Existing road brick walls to be retained, making good and rendered on the outside
- Existing retaining walls to be retained and made good
- Existing walls to the upper plane to be retained in-situ making good
- New close boarded timber fence
- New close boarded timber fence
- New brick corner wall
- Existing walls & railings to be retained and making good
- Existing walls to be retained and making good
- Existing building
- Existing walls & railings to be retained and making good

Social Rent:

Room	Description	No.
F	1b Flat	14 No.
G/1	2b Bungalow	2 No.
G/2	2b Bungalow	1 No.
H	2b House	8 No.
J	3b House	4 No.
K	4b House	2 No.

Sub-total: 31 No.

Open Market:

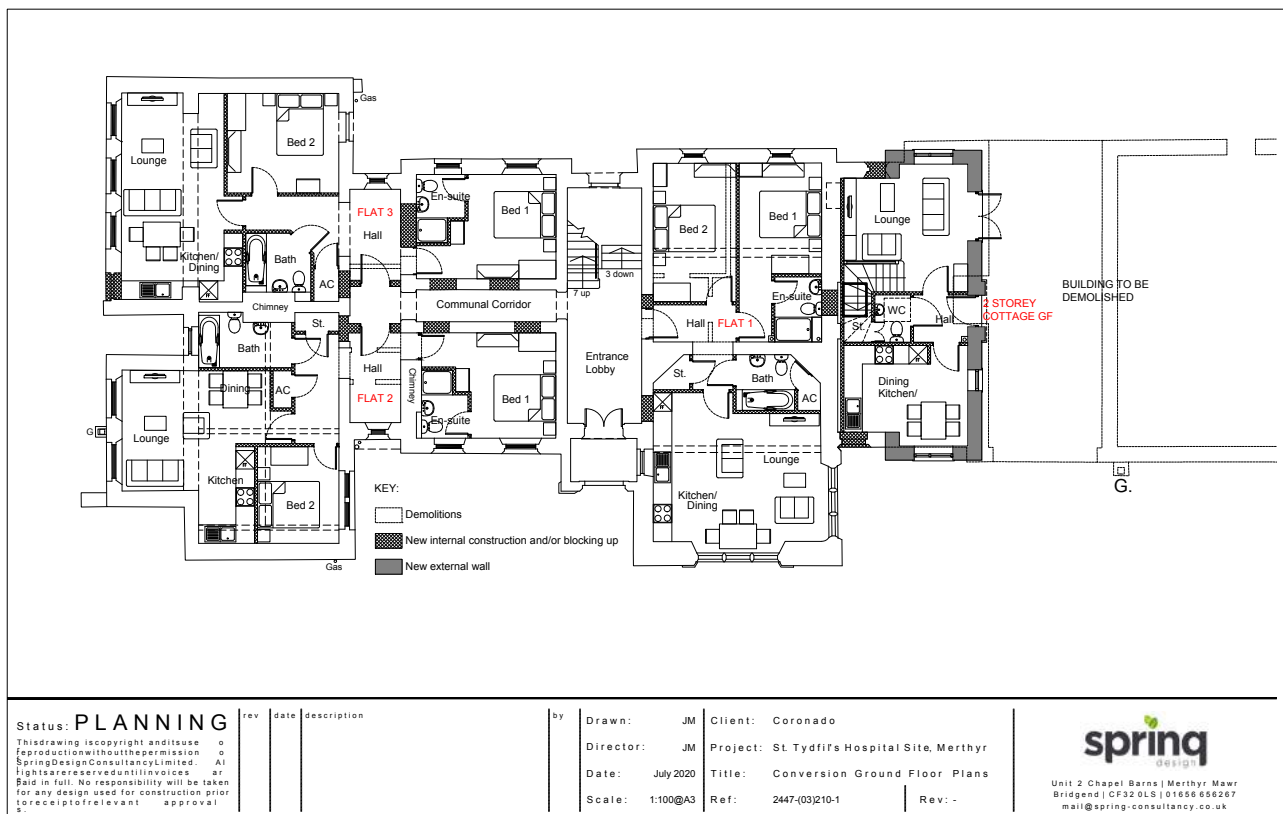
Room	Description	No.
B	2b House	6 No.
C	3b House	15 No.
D	3b House	6 No.
E	3b House	4 No.
Plot 1 2b 'Cottage'	Flat Conversions	1 No.
		7 No.

Sub-total: 39 No.

TOTAL: 70 No.

Please refer to Tree Survey and Arborist Report dated 12-03-20

Limited new openings and blocking of existing doorways is required, along with new internal partitions that will provide the new apartments with minimum intervention.



Stone salvaged from the demolition shall be reused in a meaningful way throughout the site in new boundary walls, otherwise a limited palette of buff brick and render shall be used to complement the existing building and wider townscape.

The south range of the listed building (excluded from the listing) and the remaining building on the south side of the site shall be demolished as part of these proposals. These demolitions are considered in detail in the following section.



7.0 DEMOLITIONS

The south range of the listed building and the remaining curtilage building on the south side of the site are proposed for demolition as part of this application to accommodate the redevelopment of the site.



Partial site survey showing affected structures. Courtesy of Senior Surveys Ltd

Building on south boundary (curtilage)

Reference to the maps on page 8 show that this structure was not part of the original workhouse but was constructed between 1897 and 1915, although none of the available information gives any indication as to its original use; it may have been the Master's house.



North east elevation from within the site

The building has not been maintained since the closure of the hospital and appears to be in poor overall condition; the blackening of the roof timbers suggests fire damage.

It is understood that this building is a curtilage structure, however since the demolition of the rest of the workhouse buildings on the site, it has lost its wider context and relationship with the principal listed building.

The site was all but cleared for redevelopment in 2014 and this remaining building does not add any further understanding of the site or anything to the story of the workhouse or hospital history.

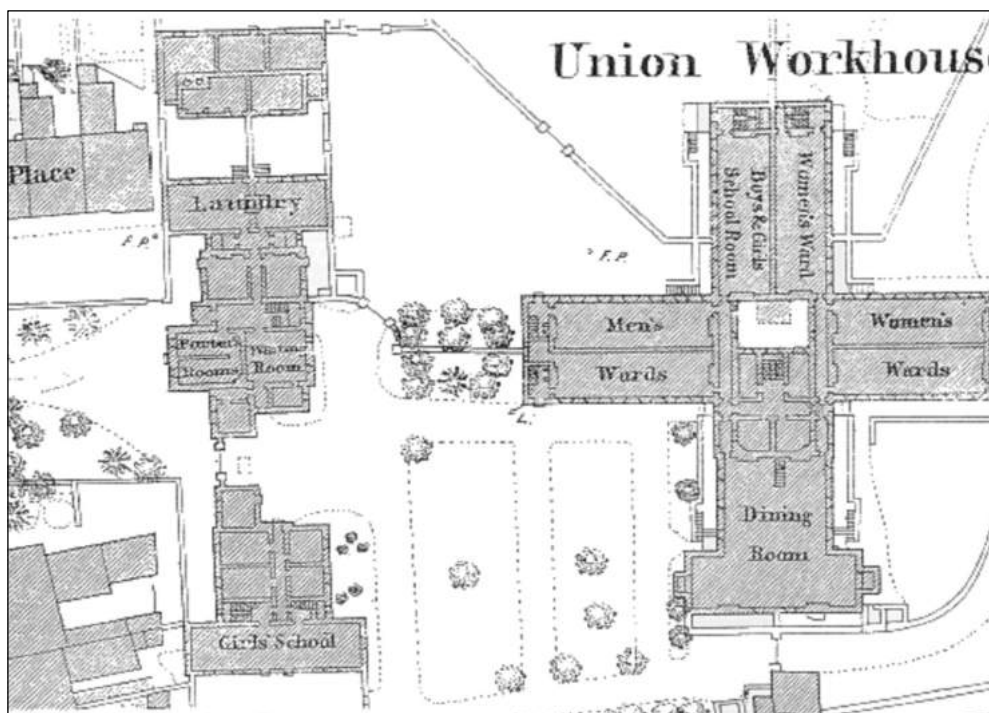
South Block:

The north part of the building was listed in 1968 as St Tydfil's Hospital: Entrance Block (Centre part only). It was amended in 1988, although the amendment is not known.

The list description notes, at the end, that: "*Attached S range not included*", thus specifically excluding this part of the structure from the listing.

In terms of its age, there is a building in the location of the south range from the earliest maps, on a slightly different footprint.

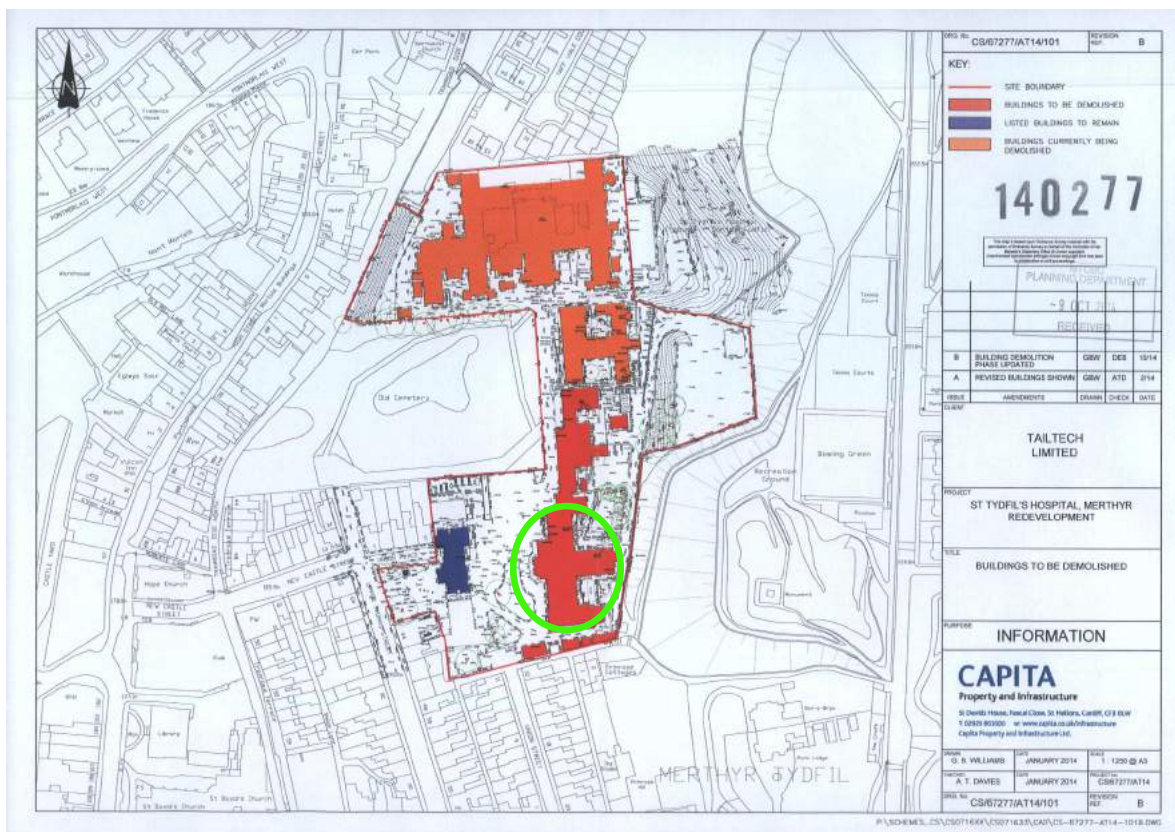
From other mapping sources (reference copies only) it appears the range was extended north and joined to the listed building between 1938 and 1957, so it would have been in this current form and position at the time of listing and available for the inspector to assess prior to writing the the list description and comments regarding this block.



Shortly after completion in 1870

Previous applications for demolition of buildings on the site include a Prior Approval for the demolition of the primary workhouse structure in 2014 (application P/14/0277).

The approved plan is shown below and the former workhouse, scheduled for demolition, is circled in green.



This building was clearly part of the original structure and the Officer Report notes that it is a curtilage building to the listed west range and considers possible measures for further protection, which are ultimately discarded. This report states:

The site is positioned within the settlement boundary and a small part of it is within the Thomastown Conservation Area. In addition one of the buildings within the site boundary is listed and the Council has determined that all other buildings within the site boundary built prior to 1948 are curtilage listed buildings.

The former workhouse building could be considered for 'spot' listing or the nearby Thomastown Conservation Area boundary could be expanded to include this land. This would mean that demolition would either require listed building consent or conservation area consent where conditions can be induced to ensure proper recording if permission for demolition is granted.

However, Cadw visited the former Workhouse in 2011 and determined that the building should not be listed.

Earlier in 2014 the Thomastown Conservation Area was appraised and its boundary was expanded. However it was not considered appropriate to include the former workhouse within the boundary at that time.

Given this, no planning application is considered necessary for the proposed works in this notification.

The application was decided in February 2014 and Planning Policy Wales Edition 5 was the up-to-date policy document at this time.

This document contained Chapter 6 - Conserving the Historic Environment, and the paragraph on demolition of listed buildings stated:

6.5.12 While it is an objective of Welsh Government policy to secure the conservation and sustainable use of historic buildings, there will very occasionally be cases where demolition is unavoidable. Listed building controls ensure that proposals for demolition are fully scrutinised and justified before any decision is reached. The demolition of any Grade I or Grade II listed building should be wholly exceptional and require the strongest justification. In determining applications for total or substantial demolition of listed buildings, authorities should take into account the condition of the building, the cost of repairing and maintaining it in relation to its importance and to the value derived from its continued use, the adequacy of efforts made to retain the building in use and the merits of alternative proposals for the site. The Welsh Government would not expect consent to be given without convincing evidence that all reasonable efforts have been made to sustain existing uses, or to find viable new uses, and that these efforts have failed; that preservation in some form of charitable or community ownership is not possible or suitable; or that redevelopment would produce substantial benefits for the community which would decisively outweigh the loss resulting from demolition. Authorities should not authorise demolition of an historic building to make way for new development, unless it is certain that the new development will proceed. This requirement can be secured by condition. Conditions may also be used to require the preservation of particular features and/or to require works to be carried out in a certain way.*

Since this application, Planning Policy Wales has been updated to the current Edition 10. Reference to the section on demolitions now reads:

6.1.12 The demolition of any listed building should be considered as exceptional and require the strongest justification.

The demolitions hereby proposed are the whole of the curtilage building on the south boundary and the south block of the listed building, excluding two nibs that attach it to the listed section that will be retained to ensure that there is no damage to the listed fabric.

Since the hospital closed in 2012 the site has remained vacant and has become an eyesore for the town. The demolition of most of the buildings on the site in 2015 has added to this air of dilapidation, however this application seeks to breathe new life into this brownfield site through the creation of a total of 74 new homes.

Since 2011, both CADW and the Council have considered strengthening the protection on the remaining buildings through a spot listing request and re-appraisal of the Thomas Town Conservation Area boundary but on neither occasion were the remaining building considered to warrant this further protection.

It is understood that demolition of these structures must be judged against paragraph 6.1.12 above, however it is considered that the buildings do not retain sufficient architectural or historic interest, nor remaining historic context, to warrant retention and the justification for their removal is the enablement of new homes on this highly sustainable brownfield town centre site.

8.0 PROPOSED DEVELOPMENT IN RELATION TO SIGNIFICANCE

The proposed plans for the listed building show seven apartments within the existing structure and a two bedroom cottage replacing part of the south building that is proposed for demolition.

The principal listed building is currently 2 storeys overall, with a three storey section in the centre and this arrangement will be retained. Some blocking of existing openings is proposed in order to accommodate internal layouts, however no new openings are proposed within the external walls; this will ensure that the fabric and character of the existing building is retained.

The proposed layout provides 2 bedroom flats with minimal interventions into the historic fabric. New internal stud walls will be required in order to separate spaces, however these new partitions have been located to ensure that historic windows and doorways are not interrupted and that any features of historic interest are retained. The stone walls have all be incorporated into the design in a meaningful way and there is the opportunity to celebrate this fabric through exposure within common areas.

The second and third floors of the central section will be retained and the decorative ceiling, exposed trusses and eaves detail will be restored and visible within the apartment at this level, with the main living spaces and bedrooms being open to the ceiling to experience the volumes.

By retaining two sizeable nibs from the demolition of the south block, it will ensure that the fabric of the listed building is not compromised or damaged through the demolition.

These nibs will be incorporated into a new cottage attached to the listed building. A pitched roof will cover the link and new structure and be subservient to the tall gables of the existing roof.

This cottage will be rendered and incorporate some reclaimed stone window surrounds. It will provide an architectural and visual transition between the listed building and the proposed new development to the east.

The significance of the principal building has been assessed as:

High aesthetic and communal values, medium evidential and historic values. The overall setting makes a negative contribution to the significance.

The impact on these values shall generally be positive. There will be an enhancement to the aesthetic value and the setting. The communal values will be enhanced through development of a derelict town centre site and the evidential and historic values will not be harmed, furthermore there is potential for future interpretation at the site regarding its history, which will enhance the historic value.

Many of the architectural characteristics of the conservation area have been brought into the new development in terms of details, proportions and layouts. These have been reflected in a contemporary way to complement the surrounding townscape and provide enhancement of the area through the sensitive redevelopment of a derelict site.

The site also benefits from the proximity of Old Cemetery Park which, whilst outside the site, will be a focus of the development through the layout enabling new homes to face onto three sides of this important and historic public open space, with pedestrian links being reinstated to regenerate the park.

As such, the development will enhance the character and appearance of the Thomastown Conservation Area.

The area to the west of the listed building will be improved through landscaping, resulting in an enhancement of the setting of the statue of Sir W T Lewis.

9.0 POLICY ANALYSIS

Considering the proposed development against legislation and policy, the requirements of section 66 of the Planning (Listed Buildings and Conservation Areas) Act state that there should be special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.

The assessment in this document has demonstrated that the significance of the listed building and listed structure on the site will be enhanced through its restoration and re-purposing. Complementary development within its setting shall further enhance the significance.

The listed statue shall also be enhanced through improvements to its setting, providing a better experience of this important figure in Merthyr Tydfil's history.

Section 72 of the Act requires that special attention shall be paid to the desirability preserving or enhancing the character or appearance of a conservation area.

Whilst most of the site is not within the Thomastown conservation area, the boundary wraps around the south western and southern edges and includes the forecourt and listed statue and as such, the development has the potential to affect the character and appearance of this area.

Care has been taken to assess the grain and architecture of the conservation area and to incorporate some of the detailing, densities and street patterns found so that the proposed development will complement the conservation area and enhance its character and appearance.

Planning Policy Wales (PPW, edition 10, December 2018), Chapter 6 deals with Distinctive and Natural Places. The objectives in terms of listed buildings and conservation areas are outlined as :

To safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved.

To preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous.

Paragraph 6.1.11 states that *"For listed buildings, the aim should be to find the best way to protect and enhance their special qualities, retaining them in sustainable use. The continuation or reinstatement of the original use should generally be the first option, but not all original uses will now be viable or appropriate. The application of planning and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building's survival or provide it with a sound economic future"*

The previous use of the principal listed building on this site ceased nearly ten years ago and the building and site have been vacant and deteriorating since then. It is therefore appropriate to seek a new viable and sustainable future use of the building and, given the urban location surrounded by residential properties, conversion to a residential use fits this requirement.

Paragraph 6.1.14 relates to conservation areas and states that there should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings.

The development will have a limited direct impact on the conservation area, but will impact on its setting; this has been demonstrated to be a positive impact through the considerate and appropriate design and layout of the new dwellings.

Through this analysis and assessment, it is considered that the requirements of the PPW heritage policies are met.

The Technical Advice Note 24 (TAN 24, May 2017) is entitled The Historic Environment. This expands on the paragraphs in previous editions of PPW but does not introduce any further requirements in terms of assessment and requirements for the consideration of applications pertaining to listed buildings and conservation areas.

The Merthyr Tydfil First Replacement Local Development Plan 2016 - 2031 contains policy Policy CW1: The Historic Environment, which states:

The integrity of our historic environment assets will be conserved and enhanced. Development proposals will only be permitted where it can be demonstrated they would preserve or enhance the architectural quality, character or the historic or cultural importance of our designated historic environment assets.

Development affecting undesignated historic environment assets including, Locally Listed Buildings or structures, Landscapes of Outstanding Historic Interest in Wales, Urban Character Areas and Archaeologically Sensitive Areas should have regard to their special character and archaeological importance.

This policy has been considered throughout the design development in order to assure a development that is sensitive to the historic environment and that will enhance the architectural quality of the historic assets on the site and the wider conservation area. As such, the requirements of this policy are considered to be met.

The Merthyr Tydfil Thomastown Conservation Area Character Appraisal and Management Plan (July 2014) notes the proximity of the former hospital site in paragraph 5.5:

It should be noted that the adopted Built Heritage Strategy (2008) also recommended that parts of the St Tydfil's Hospital site be considered for inclusion into an expanded Conservation Area. Since 2008 the NHS has vacated and sold the site.

At the time of writing the site is in the hands of a private owner and discussions are taking place with the Council regarding potential redevelopment of the site including the potential reuse of the listed entrance block and former Union Workhouse.

It should also be noted that in 2011 Cadw visited the St Tydfil's Hospital site and did not consider that the former Union Workhouse or any other elements of the site were worthy of being listed. The former Union Workhouse is noted for its historic importance to Merthyr Tydfil and its architectural quality.

At the same time it is also noted however that it has been much altered, losing one wing of its original cross shaped formation and having an unsympathetic 1970s extension situated across the front (west) elevation which greatly obscures the historic parts of the building. Given these reasons it is not considered appropriate to recommend the inclusion of any more of the St Tydfil's Hospital site within an enlarged Conservation Area. However the Council will continually monitor this issue and may consider incorporating parts of the St Tydfil's Hospital site in the future.

Since this was written, most of the former hospital buildings have been demolished and the site has deteriorated further. However, this application seeks to restore the listed building and rebuild the site to provide new dwellings that will pick up on key characteristics of the conservation area, thereby making a positive contribution to its setting.

Paragraph 7.2 of the Appraisal states that the Council will endeavour to ensure that any proposed development is of a high quality design and fully justified in its context. Any proposal for development in the Conservation Area will only be permitted if it preserves and enhances the area and accords with the heritage and conservation policies of the Local Development Plan.

After examination of all the above legislation, policy and guidance, it is considered that the proposals for restoration of the listed building and redevelopment of the derelict site with sympathetic and appropriate residential development will meet the various requirements.

13.0 CONCLUSIONS

The proposals involve the redevelopment of the former St Tydfil's Hospital site with 64 new dwellings, plus the conversion and restoration of the listed building at the entrance to the site for 7 apartments and a new build cottage.

The sensitivity of the listed building and structure, their settings and the wider conservation area have been assessed in this document and supports the layout, scale massing and materials of the development being proposed.

The CADW document "Conservation Principles" has been referred to during the design development in order to minimise the potential impact. In particular the 6 Principles of Conservation by which any applications for change should be considered have been respected.

These principles are:

Principle 1 - Historic assets will be managed to sustain their values

Principle 2 - Understanding the significance of historic assets is vital

Principle 3 - The historic environment is a shared resource

Principle 4 - Everyone will be able to participate in sustaining the historic environment

Principle 5 - Decisions about change must be reasonable, transparent and consistent

Principle 6 - Documenting and learning from decisions is essential

In addition, this document also states in paragraph 17:

The restoration of an historic asset will normally only be acceptable if:

- a. The enhanced heritage value of the elements that would be restored decisively outweighs the value of those that would be lost; and*
- b. the work proposed is justified by compelling evidence of the evolution of that place, and is executed in accordance with that evidence; and*
- c. the form in which the asset currently exists is not the result of a significant historical event but rather due to progressive decay or mis-management; and*
- d. the work proposed respects previous forms of that place and is designed not to prejudice alternative solutions in the future; and*
- e. the maintenance implications of the proposed restoration are considered to be sustainable.*

The restoration of the listed building will enhance its aesthetic and communal values and will not harm the historic or evidential values. There is clear evidence of the evolution of the site and whilst this has resulted in the clearance of most of the buildings, the site is now ready for a new and sustainable future use that respects its past and surroundings.

In paragraph 28:

New work or alteration to an historic asset will normally only

be acceptable if:

- a. The need for the work is fully justified; and*
- b. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the asset; and*
- c. the proposal would not materially harm the values of that asset, which, where appropriate, would be reinforced or further revealed; and*

d. the quality of design and execution must add value to the existing asset; and

e. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, largely reversible or be designed not to prejudice alternative solutions in the future.

This document has outlined the significance of the listed buildings on the site and assessed the extent and contribution of their setting. It has found that overall the proposal will be a positive enhancement, not only to the special architectural and historic importance of the listed building and its setting, but also to the character and appearance of the wider conservation area, thereby reinforcing the values of the historic assets.

PPW puts great weight on the delivery of sustainable development that improve the social, economic, environmental and cultural wellbeing of Wales.

The proposed development will meet these objectives through the redevelopment of a town centre brownfield site for housing, the restoration and re-use of a redundant listed building and the re-landscaping of the brownfield site and provision of and links to existing green spaces, providing wildlife corridors between existing parks.

The public benefits of the proposals will enhance the historic environment and will provide housing in a sustainable location that will benefit the town and wider area.

Appendix 1 - List Descriptions

Full Report for Listed Buildings



Summary Description of a Listed Buildings

Reference Number	Building Number	Grade	Status	Date of Designation	Date of Amendment
11475		II	Designated	13/01/1988	13/01/1988
Name of Property		Address			
St Tydfil's Hospital: Entrance Block (Centre Part Only)					

Location

Unitary Authority	Community	Town	Locality	Easting	Northing
Merthyr Tydfil	Town			305111	206368
Street Side		Location			
		Set to rear of railed forecourt with drive leading diagonally to plain opening in right-hand range. Union Place approaches on left.			

Description

Broad Class	Period
Health and Welfare	

History

Dated 1870. Originally built as part of the Merthyr Union Workhouse (first built 1853).

Exterior

Decorated Gothic style. 2-storey gabled range coming forward, snecked rubble facings, freestone dressings, slate roof with ventilator. Kneeler parapet to gable with finial and date-panel. Large 4-light traceried window with ogee quatrefoils, cusping, crenellated transom etc under segmented head; dripmould with headstops. Upper floor corbelled out with freestone dressing linked to bold 3-light ground floor window with rectangular dripmould, foliage stops and carved spandrels. Right return front with 2-light window over 3-light, details as before. Left return with similar upper window over gabled porch forward from 2-storey Tudor-style block (facing Union Place); gabled wing with apex chimney forward on outer left. Slate roofs, sash windows in chamfered reveals, pointed doorway under Gothic fanlight. Rear elevation similar with 2-window gabled cross-range, traceried 2-light windows as before. Attached S range not included.

Interior

Reason for designation

Cadw : Full Report for Listed Buildings

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Full Report for Listed Buildings



Summary Description of a Listed Buildings

Reference Number	Building Number	Grade	Status	Date of Designation	Date of Amendment
11476		II	Designated	13/01/1988	13/01/1988

Name of Property	Address
Statue & Plinth to Sir W.T. Lewis	

Location

Unitary Authority	Community	Town	Locality	Easting	Northing
Merthyr Tydfil	Town			305089	206350

Street Side	Location
	To left hand side of entrance forecourt at St Tydfil's Hospital. Relocated from original site outside the General Hospital, Penydarren Road.

Description

Broad Class	Period
Commemorative	

History

Granite plinth dated 1900. Bronze statute by T Brock RA, sculptor of London, 1898.

Exterior

Standing, bearded figure with arms across front holding unrolled document or plan. Miners' lamp and pile of papers at rear of feet. Tapering pedestal with moulded cornice and stepped plinth. Bronze heraldic plaque to front. Long (rear) inscription of good works begins: "Erected by the Voluntary Subscriptions of Friends and Admirers....".

Interior

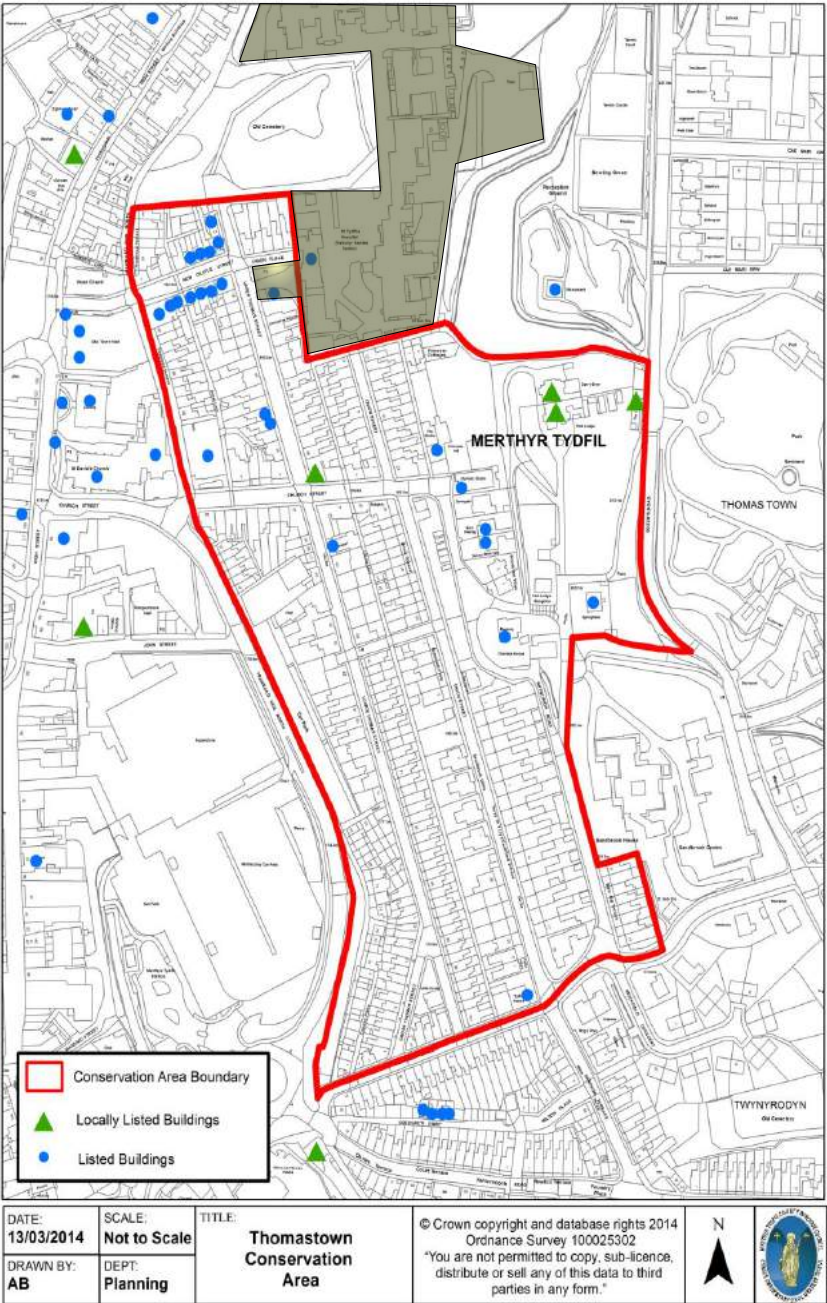
Reason for designation

Cadw : Full Report for Listed Buildings

[Records 1 of 1

Appendix 2 - Thomastown Conservation Area Map
(Approximate site marked)

Below – Map of the existing Conservation Area



Appendix 3 - Summary Heritage Impact Table

PROPOSALS FOR RESTORATION OF LISTED BUILDING AT THE FORMER ST TYDFIL'S HOSPITAL, MERTHYR TYDFIL					
SUMMARY HERITAGE IMPACT STATEMENT - PRE-APPLICATION STAGE					
Proposed Work	Objective	Significance of affected fabric	Assessment of beneficial impact	Assessment of harmful impact	Proposed solution
Restoration of historic fabric in Grade II Listed Building	Preserve the historic asset for future use	Original building fabric in poor structural and decorative condition due to vacant state for over 8 years	Securing a viable future of the structure	loss of limited material and original openings	Careful consideration during detailed design phase to ensure loss is minimised and treated respectfully
Conversion of Grade II listed building into 7 flats	Securing the long term future of the building	Original building fabric in poor structural and decorative condition due to vacant state for over 8 years	Securing a viable future of the structure	Subdivision of existing spaces to provide bedrooms and bathrooms, limited blocking up of existing openings in historic fabric and new openings	Draft plans show harmful impacts have been limited to minimum necessary to provide useable accommodation. Careful consideration during detailed design phase to continue this approach
Addition of 2 storey cottage to south of existing building	Provision of additional dwelling and protection of historic fabric during demolition of existing structure	Fabric affected is not historic part of the later southern extension, however is physically joined to the listed building	Removal of inappropriate southern extension will benefit the listed building	Potential impact on the appearance of the listed building	Careful consideration during detailed design phase to ensure harm is minimised and the building treated respectfully
Development within the setting of the Grade II listed building	Redevelopment of derelict site to the east and north of the building	negative contribution made by the setting to the significance of the building	Enhancement of setting	Unlikely to be any harmful impact	Careful consideration during detailed design phase to ensure that the redevelopment results in a nett enhancement of the setting.
Development within the setting of the Grade II listed statue	Redevelopment of derelict site around of the statue	negative contribution made by the setting to the significance of the structure	Enhancement of setting	Unlikely to be any harmful impact	Careful consideration during detailed design phase to ensure that the redevelopment results in a nett enhancement of the setting.
Development within the Thomastown Conservation Area	Entrance to redevelopment of wider site	Currently negative contribution to the conservation area	Enhancement of setting	Unlikely to be any harmful impact	Careful consideration during detailed design phase to ensure that the redevelopment results in a nett enhancement of the setting.
Development within the setting of the Thomastown Conservation Area	Redevelopment of derelict site that sits adjacent to the conservation area	Currently negative contribution to the conservation area	Enhancement of setting	Unlikely to be any harmful impact	Careful consideration during detailed design phase to ensure that the redevelopment results in a nett enhancement of the setting.



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