

Planning, Design and Access Statement

Former St. Tydfil's Hospital Site, Merthyr Tydfil
August 2020



Introduction	
Client	This statement has been prepared on behalf of St Tydfil's Developments LLP.
Scope	This statement accompanies a full planning application for the <i>Demolition of remaining Curtilage Buildings and South Block of Main Building; Alteration, Extension and Conversion of Retained Main Block to Create 7 Apartments and a Dwellinghouse; Construction of 62 New Build Dwellings (including 31 Affordable Dwellings); Landscaping, Engineering and other Associated Works</i> at the Former St. Tydfil's Hospital, Merthyr Tydfil.
Site Details	
Site Address	Former St. Tydfil's Hospital Site, Merthyr Tydfil.
Site Location	Fig.1 Application Site 
The Site and its Context	Site Description The application site is an irregular shaped parcel of land measuring approximately 2.06ha located in Merthyr Tydfil, approximately 160m from the town centre. The site was formerly a hospital originally built in 1853 but closed in 2012 and the majority of buildings associated with the hospital use were demolished in 2015/16, save for the entrance block and attached wing. The application site is rooted in local history and possesses important heritage assets. The heritage assets include the former Hospital entrance block, part of the original Union Workhouse, which is Grade II listed and located at the site entrance point. The attached wing is not listed despite its physical attachment to the main building. A listed statue, dedicated to Sir W.T. Lewis, Lord Merthyr, is located west of the listed building and adjacent to the site access point. The Thomastown Conservation Area is located immediately to the south and includes a small part of the most western portion of the site, where the existing access is located. The Old Cemetery immediately adjacent to the site's western boundary was a cholera cemetery and is now used as public open space.

Taff Vale Court to the north of the application site comprises of a pair of large, semi-detached, dwellings together with apartments blocks located immediately adjacent to the site boundary. No. 11 and No. 12 Union Street and No. 1 and No. 2 Primrose Cottages lie in close proximity to the southern boundary, but sit at a lower level. Along the western boundary are residential properties on Union Place and Upper Thomas Street and, to the north of these, the public open space of The Old Cemetery and a wooded highways embankment. The eastern boundary of the site is defined by a woodland area which sits at a significantly higher level than the majority of the site and, beyond this, Thomastown Park and Recreation Ground which comprises of a large formal open space area.

The application site itself mainly comprises of hardstanding and crushed rubble; remnants of the demolition of the former hospital. The adjacent woodland to the east and woodland within the Old Cemetery area have encroached along the site periphery along with ruderal vegetation. There are also small areas of semi-improved grassland to the south and east. There are 7no. trees within the site limited which are protected by a Tree Preservation Order (hereafter referred to as TPO), five are located in the south western corner of the site and two are located centrally along the western boundary.

Most of the site is relatively flat, with a fall of approximately 3m from north to south and approximately 7m from east to west. The easternmost section, however, sits on a plateau approximately 8m higher than the remainder of the site.

Vehicular access into the site is currently from Upper Thomas Street, via an archway within in the non-listed southern wing of the hospital building.

Pedestrian access was previously provided to the hospital site from The Old Cemetery. Whilst the openings into the site have been blocked, the paths leading to them from the park are still in existence.

Surrounding Area

The site's character is unique in its setting as a result of its irregular shape and physical isolation from the wider urban grain. This detachment is further exacerbated by the physical separation of the site from surrounding features including Thomastown Park, separated by woodland, and differing topography. The physical separation of Merthyr Tydfil town centre to the west and the lower ground levels of the properties to the south. Yet the site is integrally linked to the local history, an important part of the Thomastown Conservation Area and possesses 2no. important heritage assets.

The surrounding development is also varied adding an additional dimension to the consideration of the character of the area and the integration of the proposed development. The development surrounding the site includes modern yet low architectural value housing to the north which is somewhat discordant with the historical urban grain to the east and the south. To the south is Thomastown Conservation Area which is characterised by Georgian and Victorian residential suburbs interspersed with listed religious and community buildings. The architectural style within the Conservation Area is a rectangular grid pattern and dwellings are hard up to the back edge of pavement. The dwelling frontages are repetitive throughout the area with the only differing features being different pastel render colour or the interspersed larger or double front properties. Overall, the area is densely developed and due to its historic development is not easily legible with open spaces or the more recent development in the area.

A full character appraisal, with supporting images of the surrounding area, is contained in the Design Vision Statement supported by images of the local area and should be read in conjunction with this Statement.

Proposed development

The proposed development seeks to reinstate and extend the listed building to create 7no. flats and an attached cottage style dwelling, and construct 62no. new building dwellings.

Works to the Listed Building

The listed building has an attached wing projecting from the southern elevation which is purposely excluded from the listing record and is proposed to be demolished. The listed structure, as recorded, will be retained and converted.

The external physical works required to facilitate the conversion are limited and include:

- New glazing to existing window openings;
- Redundant windows in non-listed retained link to be blocked up and rendered over; and
- Repair work to stone work where required.

The proposed cottage extension would be the most significant works to the listed building and is proposed to be attached to the southern elevation in place of the non-listed wing to be demolished. The proposed cottage will be small scale, set lower than the height of the listed building and set back from the principle elevation. The cottage material palette includes a slate roof, rendered walls, stone windows, reclaimed stone plinth and garden wall.

Internal works to the listed building do not require planning permission but will require Listed Building Consent and are detailed fully in the supporting Heritage Impact Assessment. In summary, these works include the reconfiguration of the internal space to create individual flats and meet modern safety standards.

The proposed layout seeks to dedicate open green areas around the listed building to provide spacious setting which also encompasses the listed statue and the TPO trees located at the entrance point. The green space to the north of the listed building will also provide shared amenity space and parking for the occupiers of the flats.

Dwelling Mix

The proposed new build development will provide a total of 70no. dwellings in the following mix and tenure:

Affordable Tenure

- 14no. one-bed flats
- 3no. two-bed bungalows;
- 8no. two-bed houses;
- 4no. three-bed houses; and
- 2no. four-bed houses.

Open Market

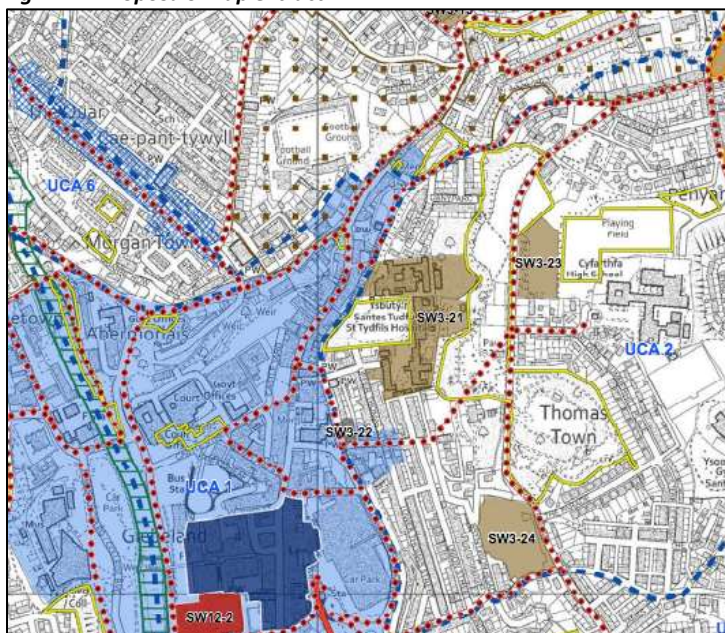
- 6no. two-bed houses;
- 25no. three-bed houses;
- 1no. two-bed cottage (part of the listed building discussed above; and
- 7no. two-bed flats (part of listed building discussed above).

The proposed material palette for the development will include: Clay brick, UPVC windows coloured dark grey, fibre cement roof tiles, UPVC rainwater goods coloured black, composite doors appropriately coloured.

	The proposed access will utilise the existing access point via Upper Thomas Street albeit reconfigured to adoptable standards. The internal road network proposes areas of tarmac highway interspersed with shared surfaces to promote reduced traffic speeds and create a stronger sense of place which is not be dominated by the private car.
Relevant Planning Policy	
Planning Policy Wales	Planning Policy Wales (PPW) Edition 10 (December 2018) is the overarching planning policy document for Wales. It sets out the land-use policy context for the consideration and evaluation of all types of development. Elements of PPW are of direct relevance to the determination of this application, as detailed in the following section.
Technical Advice Notes	Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs: • TAN 5: Nature Conservation and Planning • TAN 10: Tree Preservation Orders • TAN 12: Design • TAN 18: Transport
Development Plan	In accord with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the development plan (in this case the adopted Merthyr Tydfil County Borough Council Local Development Plan) unless material considerations indicate otherwise. The Development Plan for the area comprises: • Merthyr Tydfil County Borough Local Development Plan (2006-2031) (adopted January 2020) and the relevant policies are: ○ Policy SW1 Provision of New Homes ○ Policy SW2 Provision of Affordable Housing ○ Policy SW3 Sustainably Distributing New Homes ○ Policy SW4 Settlement Boundaries ○ Policy SW9 Planning Obligations ○ Policy SW10 Protecting and Improving Open Spaces ○ Policy SW11 Sustainable Design and Placemaking ○ Policy SW12 Improving the Transport Network ○ Policy SW13 Protecting and Improving Local Community Facilities ○ Policy CW1 Historic Environment ○ Policy EnW1 Nature Conservation and Ecosystem Resilience The site is subject to the following designations within the adopted Local Development Plan: • Within settlement boundary; and • Policy SW3 Housing Allocation (reference SW3-21). In addition, the following designations are relevant: • Thomastown Park and Recreation Ground and The Old Cemetery (west and east, respectively) are designated open spaces under Policy SW10; • Old Cemetery and The Site is partially within the Thomastown Conservation Area; • St. Tydfil's Hospital is Grade II listed; • 7no. trees within the site limits are protected by Tree Preservation Order.

The relevant extract of the Local Development Plan Proposals Plan is below.

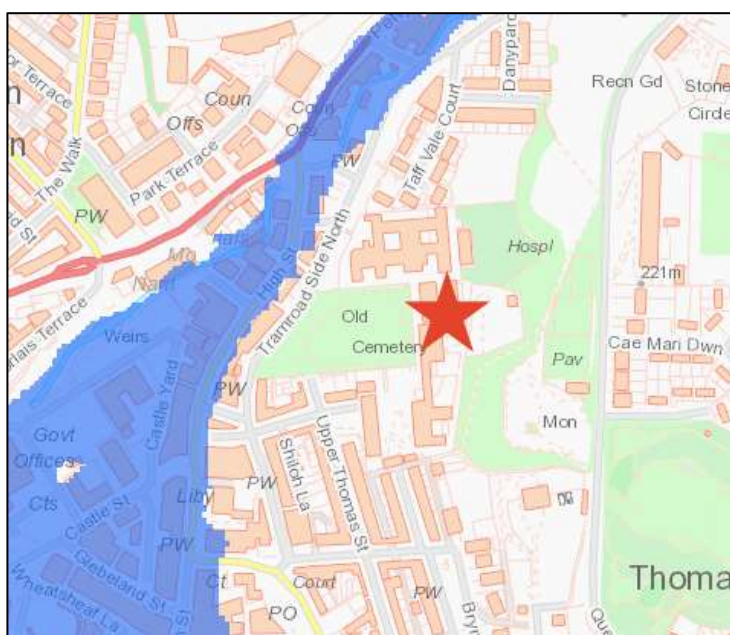
Fig.2 LDP Proposals Map extract



Flood Risk

The TAN 15 Development Advice Maps identify the site as lying within as Zone A (Considered to be at little or no risk of fluvial or coastal/tidal flooding).

Fig 3. DAM Map



Planning History

Planning History

The following planning history is of relevance:

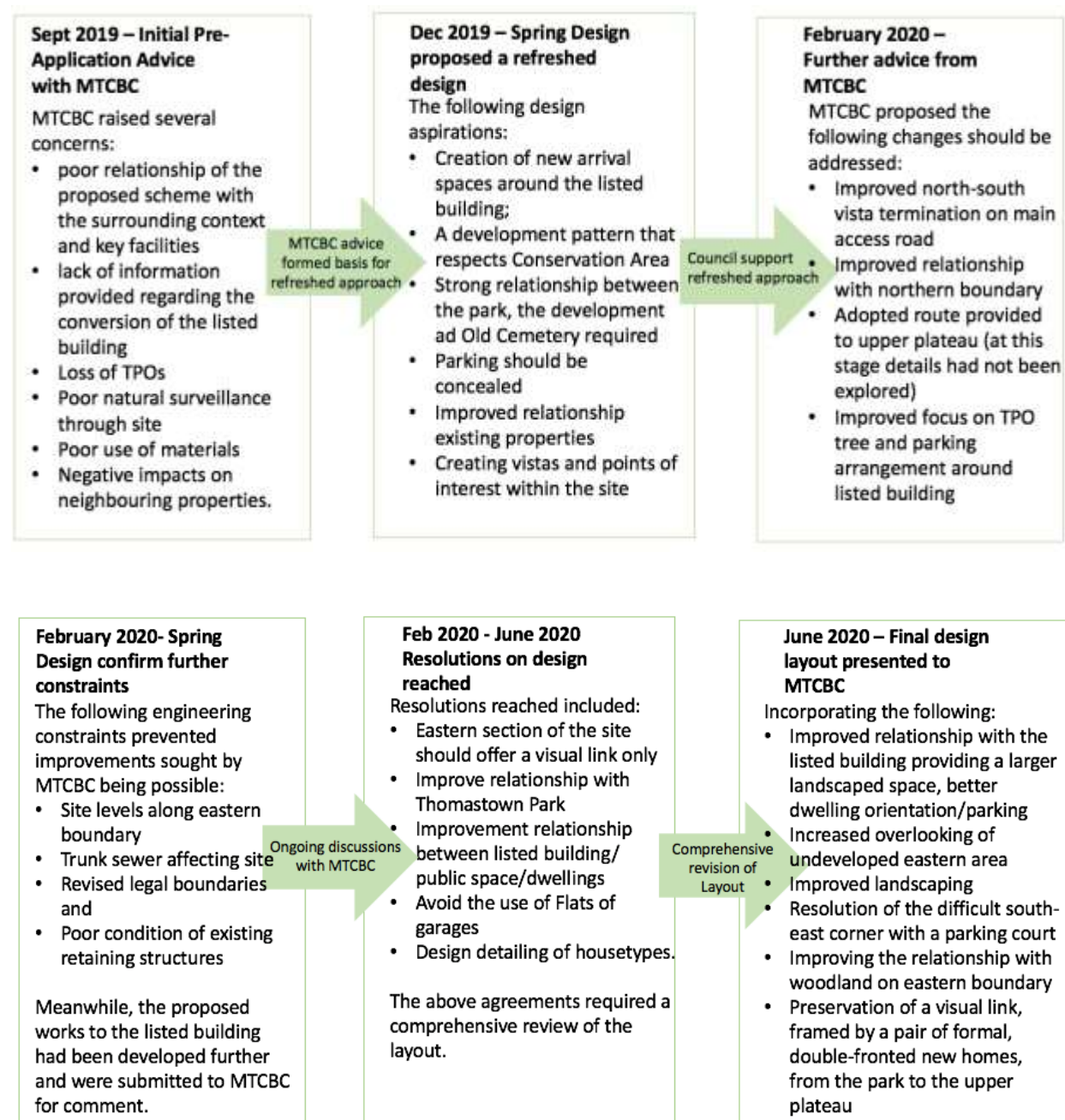
Pre-Application Enquiry PA/19/0040

Pre-Application Enquiry for proposed residential scheme comprising 75no. units

LPA Formal Response September 2019 and ongoing correspondence relating to design matters.

Design Evolution

The proposed development has been subject to rigorous pre-application advice which included planning advice but also extensive input which informed the design evolution of the scheme from conception to the proposed layout which accompanies the planning application. The supporting Design Vision Statement provides a comprehensive overview of the design evolution and rationale of the final proposed scheme. A timeline summary is provided below:



The final layout is as a result of continued, constructive dialogue with MTCBC over a nine month period which has assisted in transforming the layout from its initial conception to the final proposed layout. The final layout maximises the site's opportunities, positively responds to the site constraints and ensures a high-quality housing development which is commemorative to the local history of the site's previous uses.

Design and Access Assessment

Character

Placemaking

Based on the existing character described earlier in this statement and expanded upon in the supporting Design Vision Statement, it is acknowledged the site presents an exciting yet challenging opportunity for redevelopment.

The place-making vision anticipates the new arrival square focusing on the Listed Building and Statue with the provision of a spacious open green space around it thereby enhancing the setting of the listed building. Creating this gateway steeped in local history provides a cultural link between the local area and the development site. This will not only provide the listed building the prominence it requires but also enhances the Thomastown Conservation Area.

The pattern of development has been carefully against the Conservation Area urban grain and follows the same north-south contour at the foot of the wooded embankment that forms the eastern boundary of the site and will ensure maximum connectivity within a self-contained site by avoiding the use of cul-de-sac. Properties are to be predominantly situated at or near the back of footpath, matching the strong build lines of the Conservation Area. Properties will, however, not be terraced to enable concealed parking, i.e. to the side or rear of properties, and housing more suited for modern living standards. To soften the streetscene, select dwellings are set a little further back from the highway to provide the opportunity for more planting

The pattern of development allows for the creation of focal corner buildings which create framed vistas and high quality streetscenes whilst also maximising natural surveillance.

The site also benefits from the proximity of Old Cemetery Park, which is envisioned as forming the focus for the development centrally. This area will be framed by new dwellings facing onto the area to enhance natural surveillance, providing the park with prominence as an important piece of public realm. The proposed development provides an opportunity to restore this space as the green heart of Thomastown.

Amount and Density

The amount of development includes 70no. dwellings in the following mix:

- 14no. one-bed flats
- 7no. two-bed flats (within the listed building)
- 3no. two-bed bungalows;
- 1no. two-bed cottage
- 14no. two-bed houses
- 29no. three-bed houses
- 2no. four-bed houses

The density equates to 33 dwellings per hectare. This represents an efficient use of land and is discussed in more detail later in this Statement.

Mixed Use and Tenure

The scheme proposes an entirely residential development of 39no. open market and 31no. social-rented affordable units. The scheme would however deliver mix of dwellings comprising of 1 and 2 bed apartments, 2 bed bungalows, and 2, 3 and 4 bed houses/cottages.

Layout

The layout has evolved (as described above) and is shown overleaf.

Fig.4 Proposed Layout Plan



The layout incorporates the following key principles:

Heritage Assets

The heritage assets were a key consideration in the development of the layout and following has been achieved:

- The listed statue is positioned in an area of green space directly north of the entrance road. It will be visible on the approach to the site and will provide a visual link from Upper Thomas Street (existing) to the new development;

	• Provision of a large space around the listed building to preserve its setting and also create a focal feature at the site entrance of this heritage features; • New dwellings on the entrance road are orientated towards to the listed building to give it more prominence in the streetscene; • Parking for the listed building has been positioned in a more discreet location, set off the northern elevation, separated by green space and screening planting is also proposed. <u>Open Spaces and Green Infrastructure</u> The site is bounded by open space to the east and west and it was essential to integrating the development with the surrounding area that these areas were acknowledged and utilised within the layout. The following has been achieved in this regard: • Improved overlooking towards the green space along the eastern boundary; • The majority of dwellings along the adjoining boundaries to the Old Cemetery front onto this open space; • The dwellings along the eastern perimeter of the Old Cemetery are double fronted to offer a strong streetscene which has presence and a strong sense of place when approaching the site via the pedestrian access in this location; • The network of footpaths within the Old Cemetery linking to the site are incorporated into the the layout to further integrate this space within the site and also to improve legibility; • The retained open space to the east will be inaccessible due to levels however the layout ensures an open vista retained ensuring views from the Old Cemetery to this space are maintained. This not only provides a visual link to the eastern boundary and woodland backdrop of the site but it also provides a sense of openness and connectivity between the Old Cemetery, the proposed development and Thomastown Park; • The alignment of the dwellings along the eastern boundary provides an ample separation between the the new dwellings and woodland to ensure less pressure on this important green infrastructure asset; • Best quality trees to be retained and set in open spaces to enhance the open spaces and their visual amenity. <u>Street Pattern</u> The proposed layout incorporates design cues from the historic urban grain of the conservation area to the south including: • Dwellings positioned close to the back edge of the footpath to development a strong build line; • Parking is positioned located to the side and rear of dwellings to avoid the streetscene being detracted from by vehicles; • Importance vista within the site are terminated with larger buildings, reflective of the historic townscape.
Scale	The scale of the proposed new dwellings is predominantly two-storey, but includes include 3no. single storey bungalows in response to local affordable housing need. The scale reflects the scale of surrounding residential development which is also predominantly two-storey.
Appearance	The appearance of the development is important to ensure the development visually integrates with the surrounding area. Given the physically detached nature of the site the visual connection is essential. Appearance is also importance in terms of the listed building including works to it and the visual integration of development around it.

Listed Building

In accordance with legislation, the works to the listed building must preserve and enhance its appearance.

The external works required to facilitate the conversion are minimal and are considered to be repair works rather than alteration, aside from the blocking up of 4no. windows on the link between the building and the proposed cottage, infilling them with block and render. This alteration is to the modern fabric and is essential to marry up the new cottage with the original building. The replacement windows will be timber.

The demolition of the southern wing will have a positive impact on its visual appearance. Its replacement with the small scale cottage with a simple and sympathetic appearance finished in high quality materials is a positive addition which will preserve the original form of the building.

The materials palette for the proposed cottage include natural and traditional high quality materials including timber, slate, reclaimed stone and rough cast, painted render.

The works to the listed building serve to enhance the building's appearance and preserve its integrity long term in accordance with the duty laid down in legislation, as well as Policy CW1 of the LDP.

New Dwellings

The proposed housetypes have been developed following an appraisal of the surrounding historic architecture and in consideration of the type of development which would complement the listed building. This appraisal identified the following design themes originating from the local historic form which have been incorporated into the house type designs:

- A distinctive and uniform, Georgian inspired style
- The use of symmetry and order to unify the character of the neighbourhood
- A hierarchy of vertically proportioned window styles and sizes, with narrower windows used on upper storeys
- Flat fronted facades generally without bay windows
- Houses generally built on or close to back of footpath
- Some double fronted properties
- Strongly defined doorways with the use of repeated, similar door-surround features
- Larger houses with traverse gables at corner locations
- The use of gables to add interest to the roofscape and add prominence to the front of buildings

The materials palette includes clay brick (image below), render, dark grey UPVC windows, fibre cement roof slates and black UPVC rainwater goods.

Extracts of the proposed housetypes are shown overleaf to demonstrate the effectiveness of incorporating these features and the high quality house types proposed (extracts of select housetypes, full house types plans accompany the application submission).



House Type B



House Type F



House Type D



House Type E



House Type G1 and G2

Access	The home-zone principles around which the site is developed to facilitate inclusive access. The use of shared-surfaces for streets attributes equal importance to all users, reducing the traditional dominance of motor vehicles. The provision of a demarcated pedestrian refuge ensures that safety of non-car users is not compromised. All properties are designed to meet Development Quality Requirements (DQR) and Welsh Housing Quality Standards (WHQS), accommodating the movement of people with varying degrees of mobility and sensory impairments. Parking spaces would be well related to the properties which they serve and would benefit from high levels of natural surveillance in line with DQR requirements. Upon completion the site would be reasonably level, with only a slight fall from east to west to facilitate drainage gradients. The would therefore be limited changes in footpath and highway gradients within the site. All properties would be designed to DDA requirements, including the provision of level/ramped access, minimum door widths and downstairs toilet facilities.
Movement	The Site is in highly sustainable location with local services, public transport and cycling routes all easily accessible on foot. The area in the immediate vicinity of the St Tydfil's Hospital development site has generally good footway provision. The main pedestrian route to Merthyr Tydfil Town Centre is via New Castle Street or Upper Thomas Street / Church Street. All of these have footway provision on both sides of the road. <u>Local Services and Facilities</u> The Site is approximately 160m from Merthyr Tydfil Town Centre which has shops, banks, food outlets, post office and other facilities and services you would expect to find in a town centre. The following are also within 500m of the site: • Pontcae Medical Centre; • Merthyr Tydfil Leisure Centre; • St. Mary's Catholic Primary School; • Caedraw Primary School • Cinema; • Supermarkets (Tesco and Aldi) • Large employment sites (such as EE Contact Centre, Orbit Business Centre) • Thomastown Recreation Ground and Park <u>Public Transport</u> It is a 325m walk to the entrance of Merthyr Bus Station which a key transport hub for the area with a significant number of service. Bus services that use this facility serve a number of locations including Pontypridd, Brecon, Abergavenny and Cardiff. The bus station has sixteen stands. The bus station is to be moved to Swan Street, which will be further away from the development site, but still within the town centre, with an anticipated date of March 2021. Swan Street is located 560m away. Merthyr Tydfil Railway Station is 500m away from the site. The station has one platform and is situated near to the Tesco Superstore in the town. The station has a half-hourly service to and from Cardiff Central on weekdays and Saturdays. Trains continue onwards to Barry and then alternately to either Barry Island or Bridgend via the Vale of Glamorgan Line. On Sundays there is a two-hourly service from Barry Island and to Bridgend via the Vale of Glamorgan Line.

	<u>Cycling</u> National Cycle Routes 8 and 477 are located in close proximity to the site (see Figure 2.1). Route 8 is a long-distance route which starts in Cardiff and passes through the Brecon Beacons and Snowdonia, before finishing on the island of Anglesey. National Cycle Route 477 is the Trevithick Trail and closely following the route of the former Merthyr Tramroad from Merthyr Tydfil to Abercynon. The site's location reduces the need to travel by private car and future occupiers have viable options to walk, cycle or use public transport in accordance with the Sustainable Transport Hierarchy contained in PPW10.
Environmental Sustainability	<u>Landscape/Habitat</u> The wider vacant site has limited landscaping and biodiversity features as detailed in the supporting ecological report. The most notable features are the trees but the majority are poor quality and are to be removed. The highest quality trees will, however, be retained. The listed building has a bat roost for common pipistrelles and suitable mitigation is proposed. The proposed re-development of the site will re-introduce a significant level of soft landscaping across the site including an area of open space and high quality street planting. The highest quality trees will be retained and the woodland along the eastern boundary will be preserved. <u>Energy and Resource Efficiency</u> All housing within the scheme will be constructed to the latest building regulation standards. <u>Water and Waster Management</u> Foul drainage will be disposed of via the main sewers. Surface water will be dealt with via the Sustainable Drainage Approval Body which ensures surface water management is environmentally sustainable and has wider benefits in terms of ecology and water quality.
Community Safety	The design of the scheme has been carefully considered to help design out crime, in accord with Secured By Design principles. All vehicular access into the development would be via Upper Thomas Street, which benefits from high-levels of natural surveillance. The layout ensures that all streets within the development are afforded a strong active frontage and high-levels of natural surveillance. The on-site public open space has been located and designed so that it is accessible, usable and desirable, with high-levels of natural surveillance from adjacent properties and public areas. Car parking has also been located where it would benefit from natural surveillance. Window orientation within the development has been designed to encourage natural surveillance of shared space while 1.8m close-boarded fences and 2.1m close-boarded fences/wall around the private rear gardens, where appropriate, will provide secure amenity space for residents.
Planning Analysis	
Land Use Planning and Sustainability	Para 1.2 of PPW identifies its primary objective as ensuring <i>“that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, as well as the Well-being of Future Generations (Wales) Act 2015 and other key legislation.”</i> Sustainable development is defined within PPW as <i>“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.”</i>

Para 1.17 of PPW goes on to state:

“A plan-led approach is the most effective way to secure sustainable development through the planning system and it is essential that plans are adopted and kept under review. Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.

Para 3.48 encourages higher-density development in highly sustainable locations, stating:

“Planning authorities should reassess development sites which are highly accessible to non-car modes and allocate them for travel intensive uses such as offices, shopping, leisure, hospitals and housing of sufficient density to fully utilise their accessibility potential.”

With regard to land-use planning and sustainability, the following LDP policies are relevant:

Policy SW1 relates to the provision of new homes and requires 2,250 additional homes to be built over the plan period. Policy SW2 expects development to deliver up to 253 affordable dwellings to address the identified need.

Policy SW3 outlines the allocated residential sites for the Local Development Plan. The application site is allocated for 50 dwellings and expected to be delivered between 2022-2024.

Notwithstanding the site's allocation, it is also located in Merthyr Tydfil which is identified as a Primary Growth Area in Policy SW4 indicating it is a key area for development over the life of the plan.

The site is an allocated housing development site, previously developed (brownfield) land within the defined settlement boundary of Merthyr Tydfil, and so its development for residential purposes accords fully with the LDP Plan.

The site will deliver in excess of the allocated amount of development, providing a total 62no. dwellings and an additional 8no. in the listed building (converted flats and the cottage). PPW10, as stated above, requires the efficient use of land and typically no less than 30 dwellings per hectare. In this case, not including the units proposed in the listed building, the development would provide 33 dwelling per hectare. The proposed layout demonstrates that an increased number of dwelling can be achieved whilst acceptably addressing all other material planning considerations (discussed in more detail below). It is, therefore, appropriate and encouraged by national policy to develop the site as efficiently as possible.

Notwithstanding the above, the proposed development would represent delivery of an identified housing allocation in excess of the allocated amount and in advance of the targeted timescales. This is a weighted material consideration in favour of the development.

With regard to sustainability, the site lies in a highly accessible location in close proximity Merthyr Tydfil Town Centre which affords a wide-range of services and facilities, as discussed in detail earlier in this statement.

The site's compliance the LDP, contribution towards the housing target and high sustainability credentials ensure full compliance with the relevant elements of PPW and the LDP, and weigh heavily in favour of the site's development.

Heritage Assets	The Planning (Listed Building and Conservation Areas) Act 1990 required development to preserve and enhance the listed buildings, their setting and conservations areas. PPW10 requires planning decisions to protect, conserve, promote and enhance the historic environment as resources for the well-being of present and future generations. Policy CW1 of the LDP requires development to conserve and enhance the integrity of the historic environment. The proposed development has been through a rigorous design evolution process in collaboration with MTCBC. The final scheme has paid special attention to the listed building and listed statue to ensure their setting is preserved by retaining ample green space around them ensure their setting is enhanced in comparison to the former hospital setting. The conversion works to the listed building will include minor repair works and internal reconfiguration. The internal works will be assessed under the Listed Building Consent application. The external works are minimal and will enhance the building which is current vacant and in a poor state of repair. The works include the addition of a dwelling to the southern elevation in place of the wing to be demolished. The dwelling is small scale and does not detract from the listed building. The works within the Conservation Area will be limited, and will involve the partial removal of an existing wall and pillars to facilitate as new access junction. The application is supported by a Heritage Impact Assessment which concludes that the restoration of the listed building will enhance its aesthetic and communal values and will not harm its historic value. In terms of the new dwellings, the Heritage Impact Assessment concludes that the proposals would be a positive enhancement to the setting if the listed building, but also to the character and appearance of the wider Conservation Area, thereby reinforcing the values of the historic assets. The proposed development will enhance the listed building, listed statue and Conservation Area setting in accordance with legislation, national policy and Policy CW1 of the LDP.
Good Design and Placemaking	PPW10 requires a holistic approach to planning and design to ensure new development promotes people's prosperity, health, happiness and well-being. Placemaking considers the context, function and relationship between a development site and its wider surroundings. Policy SW11 requires development to contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. Good Design and Placemaking has been discussed at length in the Design and Access section of this Statement and to avoid repetition, it will not be discussed again. It is clear from the detailed discussion the proposed scheme layout and appearance has been developed holistically, in full collaboration with MTCBC, and is in accordance with the placemaking principles of PPW10 and Policy SW11.

Impact on
Residential
Amenity

PPW10 requires, as part of the wider placemaking principles, to ensure the amenity of existing properties are considered fully when proposing a new development and that harm is avoided.

Policy SW11 requires development to have an acceptable impact on residential amenity. The existing dwellings that will be most affected by the proposals are identified as and the associated impact analysed in turn below:

- No. 1 and 2 Primrose Cottages;
- No. 11 and 12 Union Street;
- No. 45-48, and Campsie House, Upper Thomas Street;
- No. 5 Union Place; and
- No.9- 12 and no. 13-18 (flat block) Taff Vale Court

No. 1 and 2 Primrose Cottages

No. 1 and 2 Primrose Cottages are semi-detached dwellings located 6.5m away from the southern boundary of the site at a lower ground level.

The nearest plots to no. 1 and no. 2 are plot 21 and 22, which are separated by a distance of approximately 16m. Due the site being at a higher level already, the impact of the retaining wall which encloses the site is already in place and the proposals will not alter this. Plots 21 and 22 will not increase the overbearing impact of the site due to them being offset from the rear boundary by approximately 10m. In terms of overlooking, due to the separation distance, proposed boundary treatments and the offset of the dwelling views from the proposed dwelling towards no. 1 and 2 will be limited and not considered to result in a harmful impact on these existing properties.

No. 11 and 12 Union Street

No. 11 and 12 Union Street are side-on to the southern boundary of the site and offset by approximately 2.5m and at a lower ground level. The site boundary along the north edge of Union Street is a stone retaining wall approximately 2.5m in height.

The proposed development seeks to build semi-detached dwellings along the southern boundary and the nearest plots are 17- 20 which will be located approximately 10m from the common boundary resulting in a separation distance of approximately 12.5m. Given this is a rear-to-side relationship and due to the established level changes, there is not considered to be an overbearing or overlooking impact. Furthermore, views from the new dwellings will be limited by the proposed boundary treatments along the rear boundary which would be at a height of 1.8m from the application site ground level.

No. 45-48, and Campsie House, Upper Thomas Street

No. 45-48, and Campsie House are located to the west of the site, along Upper Thomas Street, and their rear boundaries are located in the western boundary of the site. The properties are offset from the boundary between 1.7m to 6.6mm, with Campsie House being the most closely related.

Whilst the separation distance is limited, the amenity of these dwellings are currently affected by the southern wing of the listed building which is just off the common boundary. The proposed development will result in the demolition of the southern wing. The nearest proposed dwelling will be side-on to the common boundary, separated by approximately 3m and would be lower scale than the southern wing. The proposed development will have a lesser impact on the properties along Upper Thomas Street than the existing situation and will not have an adverse overbearing impact. In terms of overlooking, the nearest plot (plot 15) is side-on to the common boundary and has 1no. window which is non-habitable (serving a bathroom) ensuring no adverse overlooking.

	<u>No.9- 12 and no. 13-18 (flat block) Taff Vale Court</u> Taff Vale Court is located to the north of the site. No. 9-12 Taff Vale Court are two sets of semi-detached dwellings located 2.1m from the northern boundary. No. 13-18 Taff Vale Court is a flat block and located approximately 3.7m from the north boundary. The proposed layout seeks to develop a landscape buffer and shared roadway between the nearest dwelling and Taff Vale Court resulting in a separation distance of approximately 18m. Given the modest scale of the proposed dwellings it is not considered they would result in an overbearing impact on Taff Vale Court. In terms of overlooking, whilst this is below the typical 21m separation distance, the proposed dwelling will face towards Taff Vale Court and be separated by a road and landscape boundary, this will provide ample screening between the existing properties and the new to prevent overlooking opportunities. To further reduce overlooking, the number of plots facing towards Taff Vale Court is limited to 3no. plots (plots 68-70) and the others along the northern boundary are side one. <u>No. 5 Union Place</u> No. 5 Union Place is located to the west of the Listed Building and has a separation distance of 1.5m from the front elevation of the Listed Building. Whilst this separation is limited, the front façade closest to No. 5 is blank and, therefore, there would be no adverse overlooking as a result of the development. There is a neutral impact in terms of overbearing since the Listed Building is already in place. The impact of the proposed development has been thoroughly assessed and demonstrated there will not be adverse impact on the existing properties most closely related to the application. The proposals accord with Policy SW11.
Highways Impact	PPW10 requires development to be carried out in locations where there is sufficient transport infrastructure. It also requires sustainably located development which can successfully achieve a modal shift towards more sustainable travel options. Policy SW11 requires development to have an acceptable impact on the highway network and provide sufficient parking. The site is currently vacant and, therefore, has no associated highway movements. The proposed development will introduce a new use which will result in an increased traffic generation which could impact on the highway network. To assess the potential impact a Transport Assessment (hereafter referred to as the TA) has been carried out and is submitted in support of the application. <u>Traffic Generation</u> The TA was informed by a traffic survey of the existing traffic flows which confirmed the peak hour average two-way flow along Upper Thomas Street is 20 in the AM peak (0800-0900) and 26 in the PM peak (1600-1700 /1700-1800). It also confirmed that in the last 5 years only one slight collision had occurred in the survey area. These results indicated the highway network was not at capacity and that no notable highway safety issues are existing in the locale. The likely traffic generation of the proposed development would be less than 1 per minute in the peak hours. The TA concluded that the impact of this increase in traffic on the local highway network junctions adjacent to the site would be negligible. The impact of the development on the local network when assessed based on 15 years ahead indicated that the local network would be operating within capacity during the peak hours. The proposed increase in traffic as a result of the development will not, therefore, have an adverse impact on the local highway network and is acceptable in accordance with Policy SW11.

	The proposed access point via Upper Thomas Street has been assessed and can achieve visibility splays in both directions at the access point which accord with Manual for Streets guidance. A swept path analysis has also been undertaken which demonstrates that refuse collection vehicles can easily access and egress the site, drawings demonstrating this are appended to the TA. In terms of parking, the maximum requirement is 150 spaces for residents which includes 14 spaces for visitors. Due to the highly sustainable location of the site, which is discussed in more detail above in relation to 'Movement', it is considered appropriate to reduce the parking to a total of 112 spaces. The break down of parking allocation is: • 42 dwellings each having 2 spaces; and • 28 dwellings having a single space. In terms of cycle parking there will be 1 stand per 5 bedrooms for apartments. The reduction in parking assists in encouraging a modal shift to more sustainable forms of transport as required by the Sustainable Transport Hierarchy contained in PPW10. The proposed development will not adversely affect highway safety and accords with PPW10 and Policy SW12.
Ecological Considerations	The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty on public authorities which seeks to put nature at the heart of decision making in Wales. PPW 10 requires Planning Authorities to maintain and enhance biodiversity and ensure development does not cause any significant loss of biodiversity features and must secure a net gain. Policy EnW1 of the LDP requires development to maintain and enhance biodiversity unless the need of development outweighs the biodiversity value and the impacts of the development on biodiversity can be effectively mitigated and managed. A preliminary ecological assessment (PEA) has been carried out at the site. The PEA identified that the site does not contain or lie adjacent to any statutory or non-statutory sites of nature conservation interest. The site is mainly rubble with limited value for biodiversity. The key features on site with potential ecological value were identified as the retained buildings and large trees for bats and small areas of scrub and grassland with potential for reptiles. A bat survey confirmed that the listed building was used by a single common pipistrelle bat in the summer months and trees along site periphery have high bat potential. Since the proposals include partial demolition of the building which contains a bat roost, a Protected Species License is required from Natural Resources Wales. The Local Planning Authority are required to assess the acceptability of the proposals which affect bats in accordance the 'Three Tests' for European Protected Species which would also be considered in the granted of a license by NRW, which are: • <i>The development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;</i> • <i>There is no satisfactory alternative; and</i> • <i>The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.</i> The proposed development fully complies with national and local planning policy. The proposed building is listed and long term protection is required under legislation and there are no satisfactory alternative

	development options are available. The supporting bat survey demonstrates the proposed development will not detrimentally affect bats subject to the identified mitigation measures. These measures can be secured via planning condition. The proposed development meets the three tests required to secure a license indicating the impact on bats would be acceptable. In terms of reptiles, due to the suspected low number of reptiles likely to be present on site it is not necessary to carry out further survey work. It is, however, necessary that the development is carried out in accordance with a reptile clearance and mitigation strategy to avoid any potential harm. The Reptile Strategy is submitted in support of the application and will be adhered to. In addition to the measures identified above, the proposed re-development of the site will provide net gain in biodiversity assets by introducing a comprehensive soft landscaping which will be managed in perpetuity. The mitigation measures and enhancements proposed offer effective and appropriate protection for the identified ecological value ensuring a negligible effect on ecological features. The proposals meet the aims of PPW10 and accords with Policy EnW1.
Trees	PPW10 and Policy EnW1 requires development to have an acceptable impact on natural features (these policies expanded on earlier in this statement). The Site has many trees on or just outside of the site limits. There are 7no. trees within the site which are protected by a Tree Preservation Order, five are located in the south western corner of the site and two are located centrally along the western boundary. A tree survey has been carried out which identifies that the majority of the trees on site are a category U or C, which in planning terms do not represent a constraint to development and their removal is acceptable. Two of the trees identified as 'C' trees (T49 and T50) are protected by TPO but were identified with bulging, weakness and internal decay and have a short remaining life span. Whilst these trees are protected, their loss in the short term is inevitable so their removal is reasonable. Three trees were identified as category B and one was a category A. Of the better quality trees identified, three will be retained but one category B tree (T51) is to be removed since it represents a significant constraint to achieving a high quality layout around the retained listed building. Given the challenges retaining the tree presented and the potential adverse impact on the setting of the listed building, its removal is considered necessary to enable the listed building to be prioritised. In the planning balance, the loss of a category B tree is outweighed by the preservation of the setting of a listed building and is, therefore, considered acceptable. The impact of the proposal on trees is considered acceptable and in accordance with Policy EnW1.
Ground Conditions	PPW10 requires amenity of future occupiers to be protected to ensure their long term well-being. Policy Enw4 relates to the protection of amenity from harmful impacts including, amongst other things, ground contamination. A desk based assessment including a site inspection has been carried out which has indicated that there is not likely to be wide spread contamination due to asbestos in the demolition material. Investigations regarding the hospital structure prior to its demolition has indicated the building was low risk but some evidence of some higher risk materials were also recorded.

	Prior to commencement of development the desk based assessment recommended that a phase 2 intrusive investigation should be carried out. Further site investigation works are appropriate to be conditioned and the applicant accepts this approach. The proposed site conditions identified indicate the site can be re-development for a residential use and potential remediation should be confirmed following further investigation works. The proposed development does not represent a risk to human health and accords with Policy EnW4.
Air Quality	PPW10 requires the planning system to maximise its well-being goals by aiming to reduce average population exposure to air pollution and developments should consider the long-term effects of current and predicted levels of air on individuals. Policy ENW4 of the LDP relates to environmental protection and requires it to be demonstrated that new development will not have an unacceptable impact in respect of, amongst other things, air quality. MTCBC have one air quality management area (AQMA), the Twynrodryn Road AQMA, for the exceedance of the annual mean NO2 air quality standard. The Application Site lies approximately 430m from the AQMA. An Air Quality Assessment has been carried out which determined that demolition and construction activities within the Application Site, prior to mitigation being implemented, would have a Low to Medium risk of dust soiling, and a Negligible to Low risk of human health impacts. Following the implementation of mitigation measures, the impact of the Proposed Development's construction phase is anticipated to be negligible. The long-term impact of the development was also assessed quantitatively and the results of the indicated that there would be a slight adverse impact on two receptors locations (6 and 7) on NO2 concentrations and a negligible impact at all other locations. The overall impact of the proposed development due to changes in traffic is deemed to be not significant at all existing receptors within and outside the AQMA. The Air Quality Assessment concluded that the proposed development would be acceptable in air quality terms for the future users. The proposed development accords with PPW and Policy EnW4.
Planning Obligations	Policy SW9 requires planning obligations to be sought in relation to affordable housing and open space. The affordable housing requirements is 10% of the total development. The proposed development offers 44% affordable housing which is in excess of the policy requirement. Open space has been provided on site in accordance with MTCBC's guidance. It is considered the open space provided is sufficient to serve the development, particularly given the proximity of open spaces in the area. The proposals accord with Policy SW9.
Sustainable Drainage	A detailed surface water drainage scheme for the site will be progressed under the SABs process. A Drainage Strategy document accompanies the application which sets-out the proposed approach in this regard, as well as the strategy for foul water discharge.

Conclusion

The proposed development represents the delivery of an allocated housing site in excess of the allocated amount and in advance of its target delivery date and the site is in a high sustainability location. This ensures the relevant elements of PPW, the LDP, and weigh heavily in favour of the site's residential development.

The scheme has been developed with careful consideration for technical considerations, including heritage assets, ecology, topography constraints, design and amenity and highway impact. The proposed layout has also been developed in close collaboration with MTCBC.

It is suggested, complies with relevant national and local planning policy in all regards and it is, therefore, concluded that the application should be supported.