

From Moira Lucas, Conservation Officer. To David Cross, Principal Officer
DC Consultation: 40-42 High Street, Howfield's Former Bakery. Date 24.04.2020



Policy Context:

Town Centre Conservation Area- Planning (Listed Buildings and Conservation Areas) Act 1990

This Act, as amended by the [Historic Environment \(Wales\) Act 2016](#), is the basic legislation that provides for:

- the special attention to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of planning functions

Planning Policy Wales- Edition 10 was published in December 2018 and is the current National policy document for making planning decisions.

‘Planning Policy Wales sets out the Welsh Government’s land use planning policies. Its primary objective is to ensure 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, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

Chapter 6 – The Historic Environment Act gives direction on best practise on the historic environment

Chapter 6, 'Distinctive and Natural Places', explains how planning system must take into account the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations. It also sets out the planning policies for the sustainable management of specific categories of historic assets.'

Technical Advice Note 24: The Historic Environment

This technical advice note provides guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and listed building consent applications. It also provides specific guidance on how the following historic assets should be considered:

- *scheduled monuments*
- *archaeological remains*
- *listed buildings*
- *conservation areas*

Local Plan Policy

Policy CW1: The Historic Environment

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.

Merthyr Tydfil County Borough Council-SPG 3 Shopfront Design Guide

This Supplementary Planning Guidance (SPG) is intended to encourage a higher standard of shopfront design in the County Borough.

This adopted guidance will be used by the Town Planning Division of Merthyr Tydfil County Borough Council when considering proposals for retail premises.

This guidance clarifies the standard of design that the Town Planning Division will expect from applicants seeking planning permission for alterations to their commercial properties.

The design of shopfronts has a major role to play in creating a quality environment. It is important that changes to shopfronts and building facades complements the local character, scale and architectural quality of the individual buildings.

This SPG is required because the declining standards of shopfront design and maintenance is gradually eroding the overall quality of retail centres within the County Borough

Proposal analysis:

The proposed use is supported in principle. However, the existing front elevation shows historic alterations to the ground floor commercial element of this structure which have changed the symmetrical balance of this key building in the Merthyr's High Street.

The drawn proposal strives towards re-instating this element in part by introducing multiple vertical glazing sections on the ground floor elevation. This is welcomed but the additional vertical bars providing opening window sections are considered to introduce additional pattern that negatively effects the balance. It is recognised that this is to facilitate an opening frontage. If the sections could lose the vertical section of each pair of windows and be one open window each, this would be more in keeping with the rhythm that already exists in the left-hand side of the ground floor. This request will make the opening windows bigger and have an impact on the external space that they open out to.

If a seamless or visually unobtrusive folding window could be sourced for this location, it would be supported as it follows the symmetrical character of this building.

The introduction of a new and proportional fascia board and cornice is welcomed and supported as is the retention and refurbishment of the centrally placed historic gates.

The introduction of tiles at stall riser level is not supported. Smooth, painted render should be used in this location.

The proposal also details a new shop awning. Details of the material proposed and a section of the awning box are required. The awning for an elevation of such length, will require robust fixing and most likely be divided into sections. It is important to understand how this interacts with the fascia.

The drawing for the front elevation shows rooflights in the roofscape.

I have also viewed the proposed roof plan and the rooflights are shown on this drawing.

I assume it is reasonable to believe that the rooflights are still proposed. Those on the principal elevation are not supported. These are a significant departure from the character and intent of the original building.

Rooflights to the rear are supported as they are marginally less visible. However, they are not ideal and the use of short dormers would have been preferred.

The submitted photomontage show a very different to the proposed drawn elevation- what is the relevance of the photomontage?

The rear elevation continues to be heavy in its execution with the loss of symmetry in the proposed fenestration. There is not an obvious design thread for the logic of this proposal and its relation to the character of the original historic structure is hard to find.

TAN 12- does indeed cover design, including access and use of DAS. The applicant states that accessibility is improved on this site but it would appear that access to all floors is achievable- this isn't clear that this is fully accessible for all users or only able bodied users? Page 9 of the DAS refers.

Page 11 of the DAS refers to photovoltaic panels – these are not shown on the plans.

The DAS does not show any design considerations made and discarded by the applicant and why this design is the preferred option? It is useful for planning authorities to understand the design philosophy that presents the final design that they are considering for consent. This is a fundamental role of the DAS.

Whilst designing of its time is a recognised concept, there has to be a thread of logical design evolution that links historic with new development. This could be use of fenestration sizes, existing materials used throughout the new iteration of the scheme, or colour. This hasn't been applied to the rear of this structure. Instead, an industrial approach has been suggested for what is one of Merthyr Tydfil's finest, historic, commercial buildings. There needs to be a match in quality of materials and design suggested. The rear elevations and courtyard details are still not supported.

As previously mentioned, the rear of this site is viewed from the train station and the public walkaway that leads into the Town centre Conservation Area. This view is now as important as the front elevation and does require a more sensitive handling.

The proposal in parts is supported but the rear elevation does not accord with either National Policy nor the LDP policies or SPG. As such the presented scheme, it is not supported for approval at this time.

If anything I have written is unclear or requires further explanation, please contact me.

Moirá Lucas