

PLANNING STATEMENT

**Former Tregenna Hotel,
Park Place,
Merthyr Tydfil**

September 2024



Summary

Proposal:

Proposed change of use from hotel (C1 Use Class) to temporary supported living accommodation (Sui Generis) with internal and external alterations and associated works

Location:

Former Tregenna Hotel, Park Place, Merthyr

Date:

September 2024

Project Reference:

23.268

Client:

Merthyr Valleys Homes

Product of:

Asbri Planning Limited
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Contents

Section 1	
Introduction	4
Section 2	
Site description and context	6
Section 3	
Pre-Application Discussions	11
Section 4	
The proposed development	13
Section 5	
Planning Policy	16
Section 6	
Appraisal	31
Section 7	
Conclusion	36

Introduction

- 1.1 This Planning Statement has been prepared on behalf of Merthyr Valleys Homes to accompany a planning application for the proposed change of use from hotel (C1 Use Class) to temporary supported living accommodation (Sui Generis) with internal and external alterations and associated works at the former Tregenna Hotel, Park Place, Merthyr Tydfil.
- 1.2 The planning application comprises the following set of drawings:

Drawing Name	Drawing Reference
<i>Measured Building Survey</i>	
Elevations A & B	001.1 Rev A
Elevations C & D	001.2 Rev A
Elevations E & F	001.3 Rev A
Floor Plan – Ground Floor	001.4 Rev A
Floor Plan – External Chalets	001.5 Rev A
Floor Plan – First Floor	001.6 Rev A
Floor Plan – Second Floor	001.7 Rev A
Elevations Sections 1 & 2	001.8 Rev A
Key Plan	001.9 Rev A
<i>Architectural</i>	
Topographic Site Plan and OS Map Location Plan	R583 S-01
Proposed Site Plan	R583 P-01
3D Views and Map Key	R583 P-02
Proposed Site Sections and Street Elevations	R583 P-03
Proposed External Lighting Plan	R583 P-04
Hotel Demolition Floor Plans	R583 P-05
Hotel Demolition Elevations	R583 P-06
Chalet Demolition Floor Plans and Elevations	R583 P-07
Hotel Proposed Ground Floor Plan	R583 P-08
Hotel Proposed First Floor Plan	R583 P-09
Hotel Proposed Second Floor Plan	R583 P-10
Hotel Proposed Elevations and Sections	R583 P-11
Hotel Proposed External Finishes	R583 P-12
Chalet Proposed Ground Floor and Elevations	R583 P-13
Chalet Proposed External Finishes	R583 P-14

1.3 In addition, the following supporting documents are submitted.

Document Name	Prepared by
Application Forms	Asbri Planning
Planning Statement	Asbri Planning
Site Assessment Report	Ecological Services
Bat Survey	Ecological Services

1.4 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:

- **Section 2:** provides a description of the site and the scheme's background
- **Section 3:** provides an overview of pre-application dialogue undertaken in regard to the emerging scheme.
- **Section 4:** summarises the development proposals.
- **Section 5:** outlines the relevant planning policy context, at both the national and local level.
- **Section 6:** addresses the key planning considerations associated with the development proposal.
- **Section 7:** provides a conclusion regarding the overall acceptability of the application.

Site description and Background

- 2.1 The application site is situated within the town of Merthyr Tydfil. The site currently comprises a 23-bed hotel and visitor car park. Following the outbreak of the Covid-19 pandemic in March 2020, the Welsh Government introduced a “no-one left out” approach to ensure that accommodation is provided to all those in need of it. Since its inception, over 12,400 people have been supported into temporary accommodation across Wales (Welsh Government, 2021). This approach has led to many Local Authorities, including Merthyr Tydfil County Borough Council (MTCBC), to become heavily reliant on the use of local B&Bs and guesthouses to provide temporary accommodation.
- 2.2 As such, the Tregenna Hotel was initially used by MTCBC in November 2020 when all other B&B accommodation in the area reached full capacity. The Local Authority booked the Tregenna Hotel for 1-year to house Merthyr Tydfil’s most vulnerable residents for emergency accommodation, and all rooms were fully occupied during this time. Since then, they have continued to book all rooms on a 3-month block booking basis, and the hotel has not resumed its originally approved use-class (C1) since this time.
- 2.3 As of the 6th December 2023, 118no. individuals reside in temporary accommodation, with 82no. living in unsuitable B&B placements. Of these individuals, 39% require high/intensive support. This, coupled with broader socio-economic challenges such as the cost-of-living crisis, fuel poverty, and refugee programs has made it increasingly difficult for the Local Authority to find suitable accommodation for those most in need. As such, Merthyr Tydfil CBC have partnered with Merthyr Valleys Homes to convert the Tregenna Hotel into suitable supported accommodation for individuals experiencing homelessness.
- 2.4 Internally the main building features:
- 3no. storerooms;
 - 2no. kitchens;
 - 3no. bars;
 - 1no. office;
 - 6no. lounge areas;
 - 2no. foyers;
 - 2no. public W/Cs; and
 - 16no. bedrooms and associated bathrooms.
- 2.5 The hotel is located within a predominantly residential area. A residential dwelling adjoins the southern boundary of the site, and further dwellings can be found further along Park Terrace. Residential

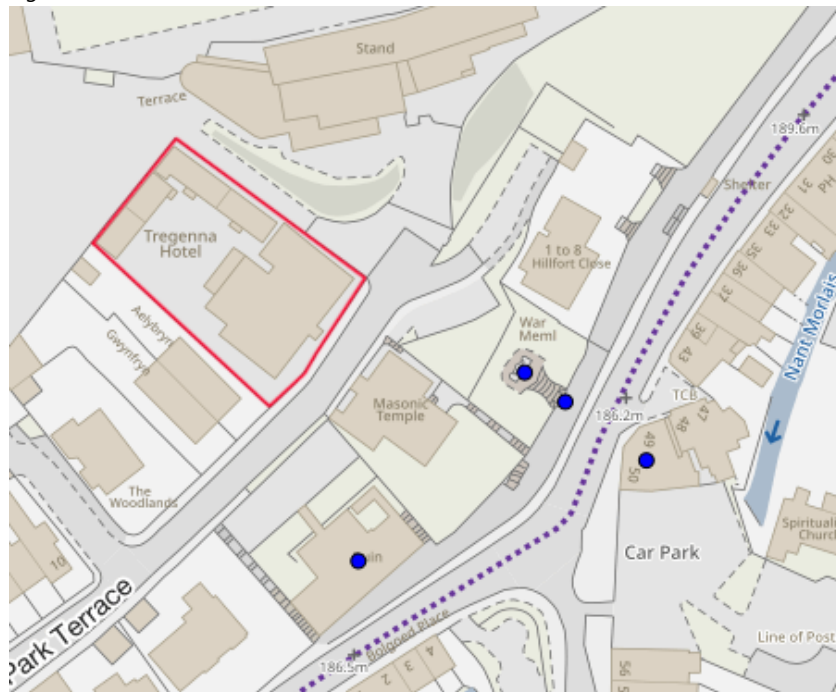
use of the site is therefore a conforming land use. To the north, Loadlok Community Stadium adjoins the site and a car park associated with the stadium is situated adjacent to the western boundary. Merthyr Tydfil Masonic Temple is located to the east of the site.

2.6 The site extends to approximately 1420m² and is enclosed by stone walls, which rise towards the rear of the site, where the site adjoins the stadium car park. It is centres on the following grid coordinates E:304989, N:206644.

2.7 A review of Cadw's online mapping service reveals that the site itself is not registered as a Listed Building or Scheduled Monument, however lies within the Registered Historic Landscape of Merthyr Tydfil (Ref: HLW (MGL) 2). Four Grade II listed structures are also located within 100m of the site, which are as follows:

- Ref: 11468 – District Education Office of Mid-Glamorgan County Council;
- Ref: 11456 – Guard Rail & Steps at Merthyr Tydfil War Memorial;
- Ref: 11455 – Merthyr Tydfil War Memorial; and
- Ref: 11447 – Flocks.

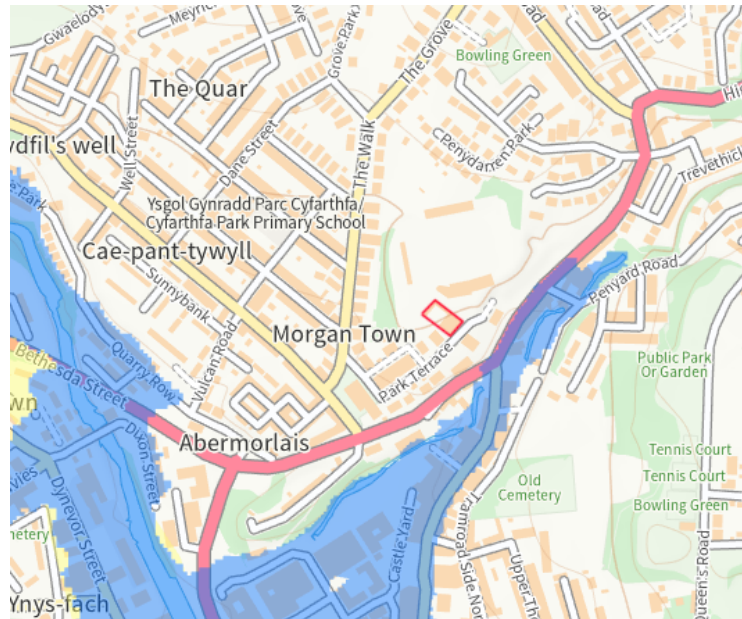
Figure 1: Site location in relation to the nearest Grade II Listed Structures



2.8 Notwithstanding the above, it should be noted that minimal exterior alterations are proposed as part of the proposed development, therefore there should be no detrimental impact upon the existing listed structures or the historical landscape of Merthyr Tydfil.

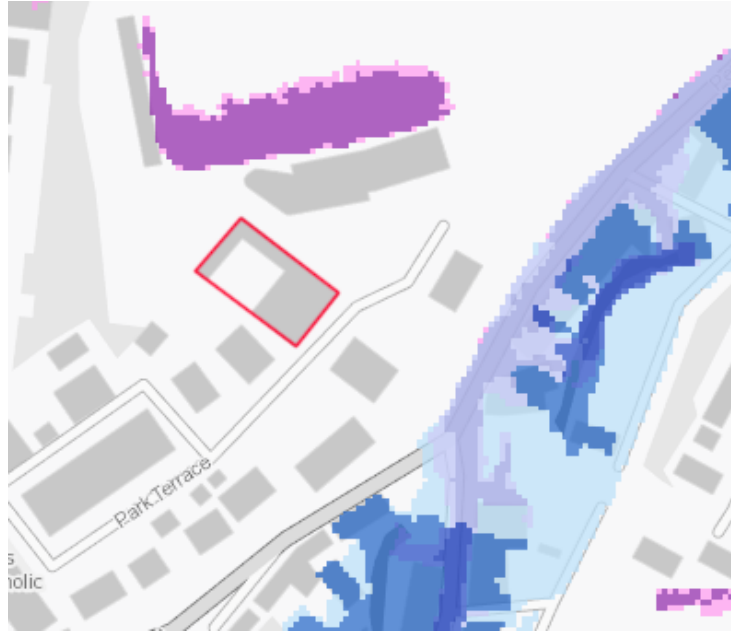
- 2.9 A review of the Coal Authority's mapping services shows that the site lies within the coal mining reporting area, however lies outside the High-Risk area. As such, it is deemed that a Coal Mining Risk Assessment is not required.
- 2.10 In respect of flooding, a review of Natural Resources Wales's development advice map reveals that the site is within Flood Zone A. As such, it is considered to be at little or no risk of fluvial or tidal/coastal flooding. As illustrated below:

Figure 2: Natural Resources Wales Development Advice Map



- 2.11 Furthermore, NRW's Flood Map for Planning (FMfP), which will supersede the DAM later in 2024, demonstrates that the site is not susceptible to surface water or small watercourse flooding.

Figure 3: Natural Resources Wales Flood Map for Planning



- 2.12 Access to the site is achieved directly off Park Terrace, and pedestrian footpaths are located on both sides of the street. Furthermore, a dropped curb is located directly outside the Tregenna Hotel and a further dropped curbs are located along Park Terrace.
- 2.13 In terms of active travel, National Cycle Network Route 8 is located approximately 450m to the southwest of the site, which extends to destinations such as Brecon to the north and Pontypridd to the south.
- 2.14 The nearest bus stops with a variety of trip destinations are located approximately 275m to the southwest of the site along Brecon Road. Here, passengers can access destinations such as Merthyr Tydfil bus station, Prince Charles Hospital and Caerphilly, via the no.27 and no.53 bus services. The no.27 bus service runs every 20minutes between the hours of 06:20 and 17:45, whilst the no.53 bus operates hourly between 07:45 and 17:45 between Monday-Friday.
- 2.15 In terms of rail transport, Merthyr Tydfil rail station is located approximately 1.1km to the south of the site, within the town centre. Here, passengers can travel to destinations such as Pontypridd and Cardiff to the south, and services operate every 30 minutes.

Planning History

2.16 A review Merthyr Tydfil CBC's online planning register reveals that the site has been subject to the following planning applications in the past:

- Ref: P/04/0486 – Alterations to accommodate disabled access ramps and associated facilities for disabled people. Approved November 2004.

Pre-application Discussions

- 3.1 The proposed development has been subject to pre-application discussions with Merthyr Tydfil County Borough Council (Ref: PA/24/0014) with a pre-app meeting being held on the 4th July 2024.
- 3.2 A summary of the response received as part of the pre-application enquiry is provided below:
- 3.3 **Confirmation of Use Class**
- The proposal would likely be considered 'sui generis'.
- 3.4 **Principle of Development**
- The site is located within the Primary Growth Area and Settlement Boundary where new development is generally supported and encouraged by Policy SW4 (Settlement Boundaries)
 - Given the nature of the development, the provision of affordable housing or open space or a financial contribution towards affordable housing, would not likely be sought.
 - Policy SW13 (Protecting and Improving Local Community Facilities) requires proposals to demonstrate that the facility is no longer required. However, Welsh Government is supporting of proposals that address homelessness.
 - Community Infrastructure Levy would not be payable if the accommodation is provided by a Registered Social Landlord.
- 3.5 **Residential Amenity**
- Planning department is not aware of any issues being raised in relation noise or disturbance since the site has been used for temporary accommodation.
 - Given the site's extant use as a hotel and as its close to Merthyr Town Football stadium, residents are likely subject to increases in noise
 - The proposed change of use will likely result in a reduction in noise and disturbance in comparison to the operation of a hotel
 - Statement on noise and disturbance should be included in support of the proposals
- 3.6 **Visual Impact**
- Advised that the proposed cladding be omitted from the scheme. However, there may be scope to use the cladding on the rear annex as this building is more discreet
 - Casement sash windows are appropriate in design and character
- 3.7 **Highways Safety, Access and Parking**
- No particular concerns raised with the development in terms of highway safety
 - Proposed parking provision should be illustrated on plan

- 3 cycle parking spaces should be provided either within the building or within separate cycle shed that is easily accessible and in a well-lit location
- Would be helpful if details could be provided that sets out the anticipated levels of traffic movement generated by occupants, staff and guests and how this would compare to the former use as a hotel

3.8 **Ecology**

- The planning application should be supported by a Preliminary Ecological Appraisal and Preliminary Roost Assessment
- Green Infrastructure Statement will be required

Proposals

- 4.1 The proposed development comprises the conversion of the property from hotel use to supported accommodation. Whilst the prevailing planning use for the site is a hotel, it should be emphasised that it has been used as emergency accommodation for some time. The proposed development regularises the use of the site but moves away from strictly emergency accommodation for short periods of time to also include supported living for longer periods.
- 4.2 The use will feature services including:
- Accommodation being provided on an emergency basis.
 - Provided to those with support needs and not yet able to sustain a tenancy.
 - Can provided flexible support.
 - Intermediate accommodation before moving into long terms accommodation.
 - Training opportunities to gain independent skills.
- 4.3 The proposed supported accommodation is designed to address the urgent and critical needs of individuals experiencing homelessness, with a focus on providing comprehensive support to those who are not yet able to sustain a traditional tenancy. The scheme will be intentionally crafted to be flexible, offering both emergency accommodation and long-term residency while delivering tailored assistance in order to foster independence.
- 4.4 The scheme will provide housing related support over 19 units of accommodation for the most complex homelessness cohort (High/Intensive Support Needs).
- 4.5 The primary objective is to offer immediate shelter to individuals facing homelessness. An in-house support provider will be in place to provide a safe and supportive environment, addressing the emergency nature of the housing crisis that our target cohort experiences.
- 4.6 Recognising that some individuals require additional support due to varied and complex needs, the scheme is dedicated to those who are not currently equipped to maintain a stable tenancy. Via personalised care plans, the successful support provider will aim to empower residents with the skills necessary for long-term housing stability.
- 4.7 Integral to our scheme is the provision of training opportunities aimed at enhancing the independent living skills of our residents. Through partnerships with local educational institutions and vocational training providers, the Local Authority will aim to offer a range of programs to empower individuals with the skills needed for self-sufficiency.

- 4.8 In conclusion, our proposed supported accommodation scheme will not only address the immediate housing needs of individuals in crisis but also prioritises their long-term success by providing targeted support, fostering independence, and facilitating a smooth transition to sustained accommodation.
- 4.9 It is crucial to emphasise the positive enhancements that the scheme would offer to residents. These include a newly refurbished building featuring:
- Communal/Training Kitchen: A state-of-the-art communal kitchen designed for both practical training and shared culinary experiences.
 - Communal Dining Area: An inviting space where residents can come together to enjoy meals and foster a sense of community.
 - Communal Lounge/Activity Room: A versatile area designed for relaxation and various activities, promoting social engagement and recreation.
 - Improved Room Facilities: Each room will be upgraded to include kitchenettes, providing residents with increased convenience and autonomy.
 - Laundry Facilities: Access to modern and efficient laundry facilities, ensuring residents have convenient and reliable options for their laundry needs.
 - 24/7 On-Site Support: Continuous on-site support around the clock to address any concerns, creating a secure and responsive environment for residents.
- 4.10 These enhancements collectively aim to elevate the overall living experience, fostering a sense of community, comfort, and support for all residents.
- 4.11 The proposed site will offer residents convenient proximity to the town centre, situated just 0.3 miles away. This ensures easy access to essential services such as health/GPs, the benefits/job centre, employment support, and education. Additionally, the local area boasts various amenities, including a variety of shops, a bus station, library and leisure centre.
- 4.12 As illustrated on the accompanying floor plans, the main building will comprise the following:
- 12no. studio apartments (including 1no. disabled studio apartment);
 - Training room;
 - Communal / training kitchen;
 - Communal W/C facilities;
 - Communal lounge / activity room;

- Communal lounge / quiet room;
- Staff overnight room;
- Staff room;
- Staff W/C facilities;
- Counselling room / 1-to-1 area;
- Staff reception office;
- Staff private office;
- Boiler/plant room;
- Laundry room and cleaner's cupboard; and
- Outdoor bin recycling store.

4.13 Further to the above, the chalets will provide 7no. further apartments. The proposed development will therefore provide a total of 19no. apartments.

4.14 The parking area is proposed to be formulated to provide 8no. spaces to accommodate for staff. The proposed staffing numbers for the scheme are as follows:

- 1no. manager;
- 7no. scheme support officers;
- 1no. accommodation coordinator; and
- 4no. project workers.

4.15 At any one time, a maximum of 5 staff will be on site and will comprise of 1no. manager, 1no. scheme support officer, 1no. accommodation coordinator, and 2no. project workers. The proposed parking provision is therefore considered to be acceptable for the operational requirements of the scheme.

Planning policy context

Introduction

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
- Merthyr Tydfil Local Development Plan (2016 - 2031).

- 5.2 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 11 (February, 2021), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Guidance Note No.2 – Planning Obligations (2012);
- Guidance Note No.4 – Sustainable Design (2013); and
- Guidance Note No.5 – Nature and Development (2015).

National Level

The Well-Being of Future Generations (Wales) Act 2015

- 5.3 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires “*public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle*”. The Act sets out seven ‘well-being’ goals as follows:

- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
- A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.

- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

5.4 Within the Act, sustainable development is defined as follows: *“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”*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

National Development Framework: Future Wales – The National Plan 2040

5.5 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. ‘Future Wales’ sets out the Welsh Government’s strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. As stated above, the National Development Framework has Development Plan status.

5.6 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Pages 54-56 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years’ time, as follows:

A Wales where people live:

- 1. ...and work in connected, inclusive and healthy places*
- 2. ...in vibrant rural places with access to homes, jobs and services*
- 3. ...in distinctive regions that tackle health and socio-economic inequality through sustainable growth*

4. ...in places with a thriving Welsh Language
5. ...and work in towns and cities which are a focus and springboard for sustainable growth
6. ...in places where prosperity, innovation and culture are promoted
7. ...in places where travel is sustainable
8. ...in places with world-class digital infrastructure
9. ...in places that sustainably manage their natural resources and reduce pollution
10. ...in places with biodiverse, resilient and connected ecosystems
11. ...in places which are decarbonised and climate-resilient

Growth Strategy

- 5.7 The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

Policy 1 – Where Wales will Grow

The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:

- *Cardiff, Newport and the Valleys*
- *Swansea Bay and Llanelli*
- *Wrexham and Deeside*

- 5.8 It is further explained that "Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources" (page 60).

- 5.9 The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows: "Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being" (page 60).

Placemaking

- 5.10 Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that "Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration".

5.11 Policy 2 of Future Wales is of key relevance in terms of placemaking, which states the following:

“The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:

- *creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities; establishing a permeable network of streets, with a hierarchy that informs the nature of development;*
- *promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and*
- *integrating green infrastructure, informed by the planning authority’s Green Infrastructure Assessment.”*

5.12 Further detail on the Welsh Government’s strategic placemaking priorities is set out at Page 66 of Future Wales. Key placemaking principles are summarised below:

Mix of uses

To create activity throughout the day and enable people to walk and cycle, rather than being reliant on travelling by car, places should have a rich mix of residential, commercial and community uses within close proximity to each other. Urban growth and regeneration should integrate different uses within neighbourhoods.

Variety of housing

To ensure places are socially mixed and cater for varied lifestyles, they should have a mix of housing types and tenures and space that allows for home-working. Urban growth and regeneration should cater for families, couples and single people of different ages, as well as providing a mix of affordable and private housing.

Walkable scale

To enable active and healthy lives, people should be able to easily walk to local facilities and public transport. Urban growth and regeneration should be focused within inner city areas and around town centres, as well as around mixed use local centres and public transport. Co-working hubs

offering an alternative to home-working are an important feature of the economy, and these should be located in town and local centres.

Density

To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities. New developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations. It may be necessary to take social distancing requirements into consideration when designing public and communal spaces.

Street network

To provide a framework for different uses and types of housing to be integrated within neighbourhoods, urban growth and regeneration should be based on a network of streets that enable social distancing if necessary. The street network should be permeable, with streets primarily connecting at both ends with other streets and providing links into, out of, and through places. The street network should have a hierarchy, with streets that have different characters and functions.

Plot-based development

To create varied and interesting places, which can be developed and change over time, and provide opportunities for people to design and build their own homes and workspaces, as well as open up the housing market to small and local builders, urban growth and regeneration should provide opportunities for the development of small plots. A plot-based approach to development should be promoted, including the subdivision of larger sites to be built in small plots or as a group of plots.

Green infrastructure

To enable urban areas to play their part in supporting ecosystem resilience, the use of innovative nature-based solutions should form part of strategies for urban growth and regeneration. Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated.

Biodiversity and Green Infrastructure

- 5.13 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires “an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable” (page 76).
- 5.14 In addition to this, the associated importance of green infrastructure is highlighted:

“As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being” (page 78).

- 5.15 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

Policy 9 – Resilient Ecological Networks and Green Infrastructure

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.*

Transport

- 5.16 Future Wales identifies that transport in Wales is currently dominated by the car and that *“our reliance on travelling by car is limiting the opportunity for physical activity and social contact to be built into people’s everyday lives and is exacerbating air and noise pollution, particularly along major routes and at busy destinations...This has an adverse impact on people’s health and well-being, contributing to life-limiting illnesses associated with physical inactivity, loneliness and isolation” (page 85).*
- 5.17 The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required *“to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel” (page 85).*

- 5.18 Policy 12 of Future Wales discusses Regional Connectivity, and states that *“Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time.”*

Planning Policy Wales Edition 12

- 5.19 Planning Policy Wales (PPW) Edition 12 was published in February 2024. The primary objective of PPW 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.

- 5.20 Sustainable Development is defined at Page 7 of PPW as follows: *“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”.*

- 5.21 Paragraph 1.18 sets out that *“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”.*

Placemaking

- 5.22 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example states that *“Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities”.*

- 5.23 It is summarised succinctly at Paragraph 2.3 that *“The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all”.*

- 5.24 Placemaking is defined at Page 14 of PPW as follows:

“Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well being in the

widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings”.

5.25 A set of ‘national sustainable placemaking outcomes’ are outlined on page 17 PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:

- *Creating and Sustaining Communities*
 - *Enables the Welsh language to thrive*
 - *Appropriate development densities*
 - *Homes and jobs to meet society’s needs*
 - *A mix of uses*
 - *Offers cultural experiences*
 - *Community based facilities and services*
- *Making Best Use of Resources*
 - *Makes best use of natural resources*
 - *Prevents waste*
 - *Prioritises the use of previously developed land and existing buildings*
 - *Unlocks potential and regenerates*
 - *High quality and built to last*
- *Maximising Environmental Protection and Limiting Environmental Impact*
 - *Resilient biodiversity and ecosystems*
 - *Distinctive and special landscapes*
 - *Integrated green infrastructure*
 - *Appropriate soundscapes*
 - *Reduces environmental risks*
 - *Manages water resources naturally*
 - *Clean air*
 - *Reduces overall pollution*
 - *Resilient to climate change*
 - *Distinctive and special historic environments*
- *Growing Our Economy in a Sustainable Manner*
 - *Fosters economic activity*
 - *Enables easy communication*
 - *Generates its own renewable energy*
 - *Vibrant and dynamic*
 - *Adaptive to change*
 - *Embraces smart and innovative technology*
- *Facilitating Accessible and Healthy Environments*
 - *Accessible and high quality green space*
 - *Accessible by means of active travel and public transport*
 - *Not car dependent*
 - *Minimises the need to travel*
 - *Provides equality of access*
 - *Feels safe and inclusive*

- Supports a diverse population
- Good connections
- Convenient access to goods and services

5.26 It is highlighted at Paragraph 2.20 that *“Not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being”.*

5.27 The implications of COVID are highlighted in Paragraph 2.22, stating for example that *“We must ensure that a post-Covid world has people’s well-being at its heart. Planning Policy Wales leads the way in this respect and contains the principles and policies needed for us to recover from this situation in a positive manner”.*

Good Design

5.28 The importance of good design in development proposals is highlighted at Paragraph 3.3 of PPW where it is stated that *“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area”.*

5.29 Good design must enable development proposals to address the issues of inclusivity and accessibility for all, and it is highlighted at Paragraph 3.6 that *“This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children...Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport”.*

5.30 In addition, it is highlighted that good design promotes environmental sustainability and contributes to the achievement of the well-being goals - Paragraph 3.7 states for example that *“Developments should seek to maximise energy efficiency and the efficient use of other resources*

(including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution”.

- 5.31 The importance of good design in term of ensuring high environmental quality is set out at Paragraph 3.8:

“Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places”.

- 5.32 Paragraph 3.12 outlines that good design is also about avoiding the creation of car-based developments by minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. It is stated that *“Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate”.*

Previously Developed Land

- 5.33 In respect of previously developed land, paragraph 3.555 state *“Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome”.*

Sustainable Transport

- 5.34 PPW advises at Paragraph 4.1.10 that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which:

- *“are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;*
- *are designed in a way which integrates them with existing land uses and neighbourhoods; and*
- *make it possible for all short journeys within and beyond the development to be easily made by walking and cycling”.*

- 5.35 Paragraph 4.1.11 summarises that: *“Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where*

necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services”.

- 5.36 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles. Paragraph 4.1.13 sets out that *“The sustainable transport hierarchy should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations, and support the delivery of schemes located, designed and supported by infrastructure which prioritises access and movement by active and sustainable transport”.*

Active Travel

- 5.37 The importance of developing local active travel networks to help mitigate the impact of new development by providing an alternative mode of travel to the private car is highlighted in PPW. It is stated at Paragraph 4.1.30 that *“Provision for active travel must be an essential component of development schemes and planning authorities must ensure new developments are designed and integrated with existing settlements and networks, in a way which makes active travel a practical, safe and attractive choice”.*

Public Transport

- 5.38 PPW advises that the availability of public transport is an important part of ensuring a place is sustainable. Paragraph 4.1.36 highlights that the planning system should facilitate this *“by locating development where there is, or can be, good access by public transport”.*

Housing

- 5.39 In respect of housing, paragraph 4.2.1 states that *“New housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities”.*
- 5.40 Furthermore, paragraph 4.2.2 identifies that the planning system must:
- *identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
 - *enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and*
 - *focus on the delivery of the identified housing requirement and the related land supply.*

Green Infrastructure

- 5.41 The importance of green infrastructure is highlighted throughout PPW. It is summarised at Paragraph 6.2.5 that *"The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places"*.

Sustainable Drainage Systems (SuDS)

- 5.42 The importance of considering SuDs as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that *"The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development"*. It is advised at Paragraph 6.6.19 that *"Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified"*.

Technical Advice Notes

- 5.43 The following Technical Advice Notes (TANS) are of relevance to the proposed development:
- 5.44 TAN 2 Planning and Affordable Housing (2006): outlines the general concept of affordable housing as being: *"the ability of households or potential households to purchase or rent property that satisfies the needs of the household without subsidy"*. The guidance requires local planning authorities to: *"include an affordable housing target in the development plan which is based on the housing need identified in the local housing market assessment, indicate how the target will be achieved using identified policy approaches and monitor the provision of affordable housing against the target and where necessary take action to ensure that the target is met"*.
- 5.45 TAN 5 Nature Conservation and Planning (2009): provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.
- 5.46 TAN 11 Noise (1997): provides advice on how the planning system can be used to minimise impact of noise without placing unreasonable restrictions on development. It outlines some of the main considerations

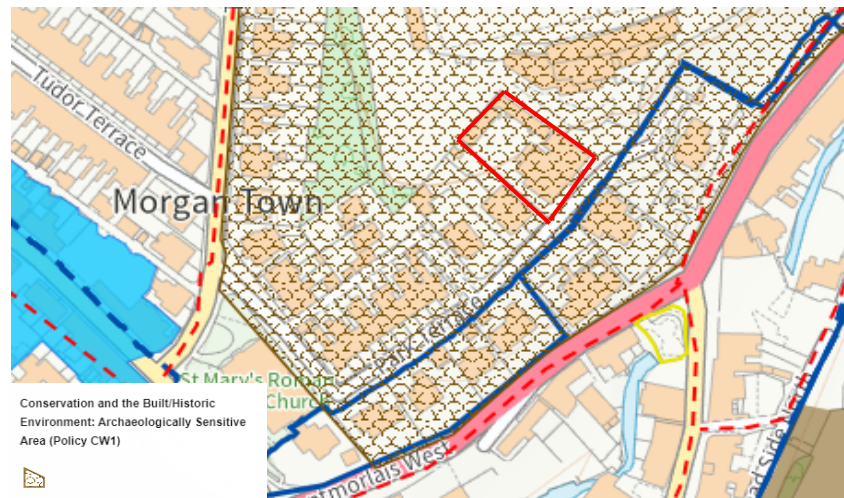
which local planning authorities should take into account in drawing up development plan policies and when determining planning applications for development which will either generate noise or be exposed to existing noise sources.

- 5.47 TAN 12 Design (2016): provides advice on design considerations and states that development should aim to:
- *Create places with the needs of people in mind, which are distinctive and respect local character*
 - *Promote layouts and design features which encourage community safety and accessibility*
 - *Focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles*
 - *Avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building*
 - *Promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards*
 - *Secures the most efficient use of land including appropriate densities*
 - *Consider and balance potential conflicts between these criteria*
- 5.48 TAN 18 Transport (2007) confirms that integration of land use planning and development of transport infrastructure has a key role to play in addressing the environmental aspects of sustainable development. Paragraph 2.4 indicates that by influencing the location, scale, density and mix of land uses and new development, land use planning can help to reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.
- 5.49 TAN 24 Historic Transport (2017) states that development in Conservation Areas should put an emphasis on controlled and positive management of change that encourages economic vibrancy and social and cultural vitality, and accords with the area's special architectural and historic qualities.

Local Level

- 5.50 The Merthyr Tydfil Local Development Plan was adopted in January 2020 and comprises part of the prevailing development plan for the area.
- 5.51 The LDP proposals map reveals that the site lies within the settlement boundary for Merthyr Tydfil. As such, is in an area where development is normally permitted. The site is also located within the Penydarren Urban Character Area and Penydarren Roman Fort and Environs Archaeologically Sensitive Area.

Figure 4: LDP Proposals Map Extract



5.52 The following LDP policies are considered relevant in the context of the proposed development:

Policy Reference	Relating to
<i>Improving our Social Well-being</i>	
SW1	Provision of New Homes
SW3	Sustainably Distributing New Homes
SW4	Settlement Boundaries
SW9	Planning Obligations
SW11	Sustainable Design and Placemaking
SW13	Protecting and Improving Local Community Facilities
<i>Improving our Cultural Well-being</i>	
CW1	Historic Environment
<i>Improving our Environmental Well-being</i>	
EnW1	Nature Conservation and Ecosystem Resilience
EnW4	Environmental Protection

5.53 Policy SW1 states that to sustainably grow the plan area population, an additional 2,250 new homes are required during the plan period (up to 2031). To ensure delivery, paragraph 6.4.7 of the LDP explains that provision has been made for 2,821 homes.

5.54 Policy SW3 states that new homes will be concentrated within the main settlement of Merthyr Tydfil. Policy SW4 relates to Settlement Boundaries and states that Merthyr Tydfil is defined as a 'Primary Growth Area' within which development will be encouraged.

5.55 Environmental policy EnW4 (Environmental Protection) states that development proposals will be required to demonstrate that the

development will not unacceptably impact upon people, residential amenity, property and/or the natural environment

Supplementary Planning Guidance

5.56 The following Supplementary Planning Guidance (SPG) adopted by Merthyr Tydfil County Borough Council is of relevance to the proposed development:

- Guidance Note No.2 – Planning Obligations (2012);
- Guidance Note No.4 – Sustainable Design (2013); and
- Guidance Note No.5 – Nature and Development (2015).

Appraisal

Overview

- 6.1 As stated above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement aims to identify the main issues of relevance to the determination of the Planning Application, and assess the scheme against the Development Plan.
- 6.2 The key material considerations of relevance to the determination of the application are as follows:
- The **principle of development** in terms of development plan policy and other planning context;
 - The impact of the development on the **residential amenity of surrounding properties**;
 - The impact of the development on the **character and appearance of the surrounding area**;
 - The acceptability of the development in terms of **sustainable transport and car parking**; and
 - The impact of the development on **ecology and green infrastructure**.

Principle of Development

- 6.3 The change of use will facilitate a temporary supported living accommodation in the form of 19no. studio apartments to support persons who are at most risk of homelessness within the county borough. The proposed development is therefore in accordance with paragraphs 3.5 and 3.6 of PPW12, which emphasises that development should address the issues of inclusivity and accessibility for all. It should also be noted that the site has been used for a similar use for a number of years.
- 6.4 With reference to its LDP Proposals Map status, the site lies within the settlement boundary of Merthyr Tydfil. As such, is in an area where development is normally permitted. This ensures that the proposals are in accordance with LDP Policy SW4 (Settlement Boundaries).
- 6.5 Policy SW13 seeks to protect and improve local community facilities. It should be emphasised that the site has not been used as a hotel for a number of years and it is therefore demonstrated that there is no longer a viable community use for the hotel in accordance with the third criterion of Policy SW13.

- 6.6 Notwithstanding, the proposal will be occupied by persons with complex care requirements for which there is a specific housing demand and will therefore continue to serve a community's needs in a different manner. Proposals can therefore be considered in accordance with PPW (12th edition) and key LDP policies such as SW4 and SW13.

Residential Amenity of Surrounding Properties

- 6.7 As aforementioned, the site adjoins residential dwellings to the south, and further dwellings can be found further along Park Terrace. The existing layout and orientation of the building ensures that the amenity of nearby existing residential properties is not unduly harmed. As such, the proposed change of use of the hotel to provide temporary living accommodation for those most in need will not result in a change in impact upon the existing residential amenity of the area.
- 6.8 Furthermore, given that the proposals are for the change of use of the existing buildings, and no extensions are proposed, the existing scale of the building will not cause any issues surrounding overlooking. Boundary treatments will also ensure there are no adverse impacts on the privacy of existing and future residents.
- 6.9 Approved Document E1 of the Welsh Building Regulations requires the protection against sound from other parts of the building and adjoining buildings. Dwelling-houses, flats and rooms for residential purposes shall be designed and constructed in such a way that they provide reasonable resistance to sound from other parts of the same building and from adjoining buildings.
- 6.10 The nature of the refurbishment related to the change of use will enhance standards compared to the previous use as a former hotel. The introduction of new double-glazed window and door units as well as the enhancements to the building fabric will all add to minimising impacts against sound to neighbouring properties.
- 6.11 In conclusion, it is considered that residential amenity within and adjacent to the site can be considered acceptable, thus in accord with LDP Policy SW11 (Sustainable Design and Placemaking) as well as TAN 12: Design.

Character and Appearance of the Surrounding Area

- 6.12 Whilst the building does not possess listed status, it does lie within the Penyarden Urban Character Area in accordance with Policy CW1 (The Historic Environment) and within close proximity to a number of listed structures. The accompanying elevations illustrate that the proposed development will not require significant alterations and that the external changes to the hotel primarily comprise the replacement of

windows and roof. As advised during the pre-application enquiry, the cladding has been omitted from the hotel façade which will now comprise a new render finish on existing dressed stone. Notwithstanding, as the chalets possesses a less prominent position, a cladding system has been proposed to their elevations.

- 6.13 Ultimately, it is considered that proposals will not negatively impact upon the character and appearance of the surrounding area. Indeed, it is considered that the proposals will positively contribute to the surrounding character whilst complying with key LDP Policies SW11 and CW1, TAN 12: Design, as well as key elements of PPW and the Well-being of Future Generations Act, within which sustainable development, health and environmental considerations drive discussions. Proposals at this site constitute a well detailed scheme which respects its siting within an established residential area within Merthyr Tydfil.

Sustainable Transport and Car Parking

- 6.14 As previously stated, there is an existing car park on site where parking takes place informally. The development proposes to regularise the car park to provide 8no. spaces. Given that no more than 5no. members of staff will be present on site at any one time, and it is unlikely that residents will have access to private vehicles, it is considered that the existing parking provision is suitable for the proposed development.
- 6.15 The hotel previously featured 23no. bedrooms that were available to guests. It is therefore considered that the vehicular trips associated with guests and staff to the former use as a hotel would be significantly more than that of the proposed development which would predominantly be limited to staff trips only. As such, the proposed development would result in a betterment in respect of the impact of the development on the local highway network in relation to vehicular trips and through the formalisation of the car parking provision.
- 6.16 It should also be noted that the nearest bus stops with a variety of trip destinations are located approximately 275m to the southwest of the site along Brecon Road. Here, passengers can access destinations such as Merthyr Tydfil bus station, Prince Charles Hospital and Caerphilly, via the no.27 and no.53 bus services. In terms of rail transport, Merthyr Tydfil rail station is located approximately 1.1km to the south of the site, within the town centre. Here, passengers can travel to destinations such as Pontypridd and Cardiff to the south.
- 6.17 In addition and in accordance with advice provided by the Highways Department during the pre-application enquiry, cycle parking provision is proposed in the form of a new covered store capable of accommodating 6no. bikes.

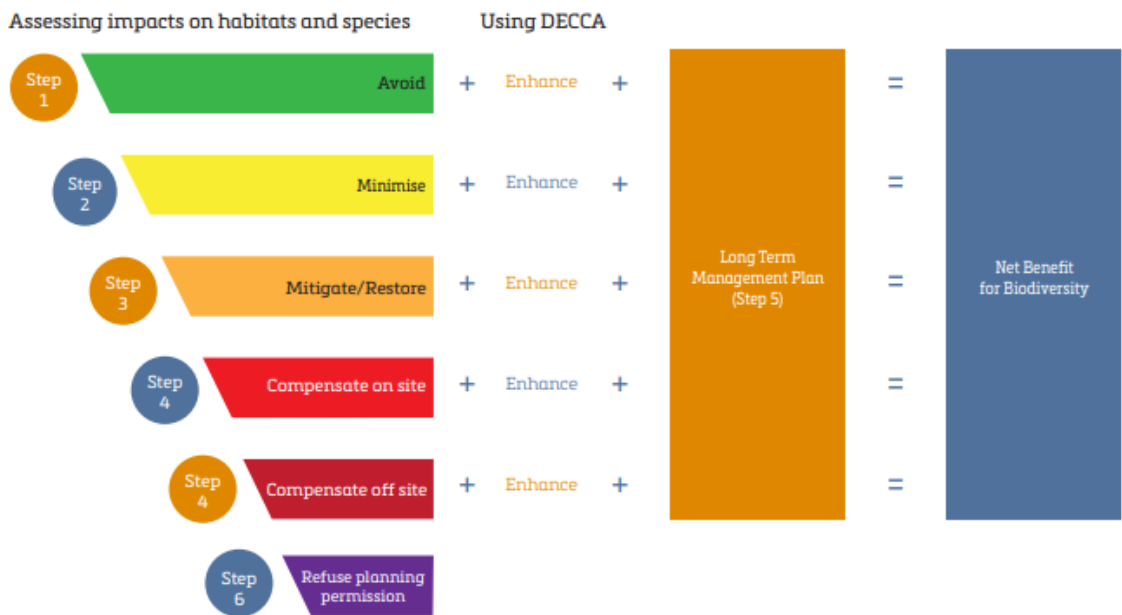
6.18 As such, the site lies within a sustainable location and is accessible by modes other than the private car, which ensures that the proposals adhere to TAN18: Transport, and Policy 12 of Future Wales: The National Plan 2040.

Ecology and Green Infrastructure

6.19 Paragraph 6.2.12 of Planning Policy Wales states that “a green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (Paragraph 6.4.15) has been applied.”

6.20 Figure 5 below provides a summary of the Step-Wise Approach:

Figure 5: Summary of Step-Wise Approach (Source: Planning Policy Wales Edition 12, 2024)



6.21 Given the built up nature of the site, it is considered that there is limited ecological value in the grounds. Notwithstanding, the application is accompanied by a Site Assessment Report prepared by Ecological Services which identifies that the bramble scrub, shrubs and buildings are likely used by nesting birds. As such, works should be undertaken outside of the bird nesting season.

- 6.22 The courtyard area possesses some limited ornamental planting that will likely need to be removed as a result of the proposed development. Notwithstanding, any loss will be compensated on site through the provision of new native planting along the front boundary and within the courtyard area.
- 6.23 In addition, the application is accompanied by a Bat Survey Report which recorded a very low number of bat calls and no bats were observed using the building. Therefore, the proposed building works will have a negligible impact on the local bat population.
- 6.24 Notwithstanding, there are opportunities to deliver ecological gain for bats and birds through the provision of the following:
- 3no. raised ridge tiles on the new roof of the main hotel building and a self contained ridge roosting area for bats
 - 1 Schwegler IFQ Surface Mounted Bat Box.
 - 1 Vivara Pro WoodStone Surface Mounted Swift Nest Box
 - 1 Vivara Pro WoodStone Surface Mounted House Sparrow Nest Box
- 6.25 It is therefore considered that the proposed development will result in a net benefit for biodiversity in accordance with Chapter 6 of PPW 12 and Policy EnW1 of the adopted LDP.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Merthyr Valleys Homes in relation to the proposed change of use from hotel (C1 Use Class) to temporary supported living accommodation (Sui Generis) with internal and external alterations and associated works at the former Tregenna Hotel, Park Place.
- 7.2 The proposed development will provide accommodation for individuals experiencing homelessness and will deliver a range of services, support and training. Consequently, the scheme is considered to be in accordance with paragraphs 3.5 and 3.6 of PPW12, which emphasise that development should address the issues of inclusivity and accessibility for all and LDP Policies SW4 and SW13 relating to settlement boundaries and protecting and improving local community facilities.
- 7.3 The proposed development is also considered to be acceptable in respect of impact on residential amenity, the historic environment, sustainable transport and parking and ecology and green infrastructure in compliance with LDP Policies SW11, CW1, EnW1 and Chapter 6 of Planning Policy Wales.
- 7.4 Based on the material considerations outlined within this statement and the accompanying drawings and documents, it is concluded that the proposal represents an acceptable and sustainable form of development which is appropriate for the location.
- 7.5 It is therefore respectfully requested that Merthyr Tydfil County Borough Council grant planning approval for the proposed change of use from hotel (C1 Use Class) to temporary supported living accommodation (Sui Generis) with internal and external alterations and associated works at the former Tregenna Hotel, Park Place.