

Internal Memo

To: David Cross, Planning Officer

From: Moira Lucas, Conservation Officer

Date: 014-10-19

Planning Application No: -190244- 40-42, High Street, Merthyr Tydfil.

Proposal: Proposed refurbishment to create 15 flats and 7 self –contained serviced units (holiday lets), together with new shop front, third floor rear extension and associated bike shed and bin store.

Thank you for consulting me with regard to the above mentioned application. I offer the following observations and comments for your consideration:

The application site is located at 40-42, High Street, Merthyr Tydfil. The building frontage is situated opposite High Street Chapel, which is included in the list of buildings of special architectural or historic interest. It is designated as a grade II structure. The rear of the site is overlooked by the train line and a recently created pedestrian access to the Tesco Superstore and car park.

The application site also lies within The Town centre Conservation Area-the character of which, is largely made up of formerly residential but latterly replaced with commercial structures. It was probably the coal-based economy that supported the considerable expansion and renewal work that took place in and around the town at the turn of the nineteenth and twentieth centuries. Much of the character of the town centre and some of the suburbs reflects this period in the industrial history of the area.



1980's altered frontage
century



Front elevation at the turn of the 20th



Shop front shown in the 1960's

Until the later nineteenth century, commercial architecture was mainly a restrained classical style using render with simple detailing, exemplified in the remnants of the formal development associated with the market square along Victoria Street, as well as some properties on High Street. In the later nineteenth century, greater stylistic freedom was matched by a greater variety of materials and finish, including imported stone, brick and terracotta, and even timber-framing. Exotic influences from Italy and Flanders, such as the gable-fronted terrace on High Street, Pontmorlais, and elsewhere were perhaps used as a conscious echo of other great European towns.

The existing site of 40-42 High Street (formerly Howfield's Bakery) has lost its original ground floor shop front with alterations carried out during the mid-twentieth century onwards.



The last nod to the barrel glass that originally encased the shop front is echoed in the left hand side of the front elevation only, with the connection to the rear part of the building still accessed through the original ornamental cast iron gate. All other decorative iron work has been previously removed.

The upper stories of the front elevation retain the original fenestration. Even with the loss of what was considered to be a beautiful and grand, ground floor elevation, what remains, still makes this structure a key building within High Street and the wider conservation area.

The rear of 40-42 High Street is known as Masonic Street.

This was the service or functional element of the buildings that faced High Street and as such, less decorative in its treatment. However, the stone elevation still retains brick dressed window and door reveals with chamfered heads and brick quoins on the building to the rear of 40- 42 High Street. Some cast iron rainwater goods and chimney stacks remain in place. The elevation is now much

more visible since its inception due to the adjacent rail track and the redevelopment of Tesco's superstore.

The proposal to create 15 flats and 7 self-contained serviced units (holiday lets), together with new shop front on the ground floor, third floor rear extension and associated bike shed and bin store, primarily focuses change on internal spaces and significant alterations to the rear elevations. Alterations to the front elevation include 3 no. roof lights inserted into the principal roof scape (facing High Street) and 5 No. roof lights on the rear elevation of the original structure. Refurbishment of the existing roof and gates and access door are also proposed for the High Street elevation.

The application has been submitted with accompanying drawings and a Design and Access statement.

Analysis;

40-42 High Street is a large 3 storeys and ornamented building within the High Street of Merthyr Tydfil. As referenced earlier it is a key building within the Town Centre Conservation Area. It is not listed.

It has been previously, poorly altered and the designation of the conservation area in 2009, recognised the collective architectural importance of the structures in this area and the need to halt poor development that would further erode the original historic fabric and architectural character.

Whilst the concept of residential units is in principle supported, the proposed design is not, for the following reasons:

- The use of three roof lights in the principle elevation is not supported as it not only breaks up a significant roof scape in a visually detrimental way but the use of three roof lights is a departure from the existing symmetry of the building and would appear as an odd, architecturally differing intervention. Plans 625.007 & 625.011 refers.
- Similarly, whilst there are 5 No. rooflights proposed for the rear extension and there is less concern for the introduction of these in this context, a lack of symmetry detracts from the proposed scheme.
- The rear fenestration is showed as retained but new windows are overly simplified and reduced to filling the openings with the chamfered heads blocked in to create a more defined rectangular opening. The loss of the original window pattern is regrettable and not supported.
- The alteration to the shop front ground floor shows one continuous fascia board to run along the full length of the frontage without a vertical break or detail. This element is historically accurate in part, however the original detail was heavily embellished to create vertical interest and thus preventing the horizontal emphasis overwhelming the ground floor in its entirety. Additionally the use of barrel glass shop fronts, evenly placed along its length, allowed for a strong vertical balance to be achieved.

However, given the historical removal of the same, the ground floor has one surviving pair of barrel glass which is not original but is a nod to the original fenestration. There exists an opportunity to re-

visit the ground floor elevation and address some of the poorly applied shop fronts that now detract from the character of 40-42 High St. A balance should be struck that addresses significant internal and rear alteration but has not addressed the principle elevation in a more holistic way.

It is assumed that the annotation of 'overhauled roof' refers to one that will be repaired.

- The proposed extension to the rear is a departure from the modest size of the surrounding and existing roofscapes that exist throughout the rear of the conservation area. The character is one of smaller, recessive, pitched roofs that sit below the High Street roofline. The roofs are covered in a variety of materials. This includes a corrugated metal roof that has a detailed, linear pattern and a relatively light colour.
- The proposed roof scape and volume are considered excessive in size and would visually overwhelm the original roof scape. The chosen material of zinc is not one that is a character of this conservation area, furthermore the continuance of Zinc into the vertical planes of the proposed and existing structure serve to amplify the visual impact of the proposed residential units.
- In this conservation area, the existing metal roofs are those associated with service units for the High Street uses. The use of Zinc standing seam roofing or wall cladding can be an attractive material but for this location it is out keeping with the conservation character. Policy BW6 refers:

Policy BW6: Townscape and built heritage:

The Council will protect and support the enhancement of the unique built heritage of the County Borough. Development proposals will only be permitted where it can be demonstrated they would preserve or enhance the architectural quality, character and setting of any of the following:

Policy BW7: Sustainable design and place making

The Council will support good quality sustainable design and require new development to:

• be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density; • integrate effectively with adjacent spaces and the public realm to enhance the general street scene and create good quality townscape; • not result in unacceptable impact on local amenity in terms of visual impact, loss of light or privacy, disturbance and traffic movements; • incorporate a good standard of landscape design; • sensitively relate to existing settlement patterns and take account of natural heritage and the historic environment on site and in terms of potential impact on neighbouring areas of importance;

- The use of a bold design with considerable mass, created from Zinc is a departure from the original materials of brick, render and fine timber details that are the essence of this particular building and not in keeping with the character of this building or the wider conservation area..

The internal changes proposed are not part of the remit to offer comments on but the use of faux grassed area are a poor material for what will be an open area with high rainfall. It is recommended that should this scheme evolve and go forward, that hard surfaced, floor area only be considered for landscaping surface treatments in this location.

I have read the accompanying DAS and refer to certain matters that the applicant might find useful:

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

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

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.

Conclusion:

[The scheme, for the reasons aforementioned, is considered to neither enhance nor preserve the character of the existing site and is not supported for approval at this time.](#)

Finally, as useful information for the applicant and their agent, **Heritage impact statements** must accompany applications for listed building consent, conservation area consent and, when requested, scheduled monument consent. **Elsewhere, they are good practice when you are planning change to any historic asset.**

Positive, well-designed change can bring improvements to our understanding and appreciation of the historic environment, as well as social and economic benefits through increased regeneration and tourism. Together, these benefits will help create the Wales we want in the future by meeting the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015.⁶ But change to the historic environment needs to be managed, which is why it is important to consider its potential impact on the significance of historic assets.

Cadw further advises to not make your plans before carrying out your heritage impact assessment — use the process to help you identify the best solution, and to save time and money. The earlier you start the assessment process, the more useful it is likely to be.

Your heritage impact statement should describe your proposals, including the design principles and concepts, and include a brief schedule of works, which gives enough information about the proposed work to enable an informed decision to be made.

The TAN- 24 Historic Environment, replaces the following Welsh Office Circulars:

- 60/96 Planning and the Historic Environment: Archaeology
- 61/96 Planning and the Historic Environment: Historic Buildings and Conservation Areas

- 1/98 Planning and the Historic Environment: Directions by the Secretary of State for Wales.

If anything I have written is unclear or requires further clarification please don't hesitate to contact me,

Kind regards,

Moira

Mrs Moira Lucas

Swyddog Dylunio, Treftadaeth a Chadwraeth Design, Heritage and Conservation Officer

Cyngor Bwrdeistref Sirol Merthyr Tudful Merthyr Tydfil County Borough Council