

# DELEGATED REPORT

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| <b>Application No:</b>                  | <b>P/24/0181</b>                                                         |
| <b>Site Address:</b>                    | <b>The Brunswick<br/>5 Church Street<br/>Merthyr Tydfil<br/>CF47 0BW</b> |
| <b>Development:</b>                     | <b>Install cladding on top half of front and side elevations</b>         |
| <b>Case Officer:</b>                    | <b>Kate Glover</b>                                                       |
| <b>Site Visit:</b>                      | <b>1st August 2024</b>                                                   |
| <b>Application Expiry Date:</b>         | <b>16th September 2024</b>                                               |
| <b>Consultation reply date expired:</b> | <b>22nd August 2024</b>                                                  |

## APPLICATION SITE

The Brunswick is a substantial property located on the corner of Upper Thomas Street, Lower Thomas Street and Church Street. The property is a Locally Listed building, dating from c.1850 and is located within the centre of the Thomastown Conservation Area.

The external materials of the property are rendered elevations, slate roof, uPVC window frames and wooden doors and door frames.

The west elevation of the property includes a pedimented feature and decorative elements around the windows and a string course between the ground and first floors. The south elevation incorporates a gable end and decoration around the doorways and a string course above the former carriage/coach entrance.

There are three Grade II Listed Buildings in the vicinity. These are No.s 32 and 33 Upper Thomas Street and the Synagogue, Church Street. No.s 32 and 33 and the property are seen together from views along Upper and Lower Thomas Street. The property and the Synagogue are seen in the same view when travelling east from the High Street to Church Street.

## PROPOSAL

This application seeks full permission to apply grey horizontal cladding on the external elevations of the property. The cladding would be used on first floor level of the elevations only and the ground floor level of the elevations would remain rendered.

## PLANNING HISTORY

The relevant planning history is summarised below:

P/04/0409 Provision of artificial chimney stack to disguise silver cowl through roof  
GRANTED 30 Sep 2004

## CONSULTATION

Consultations were not carried out as part of this application.

## PUBLICITY

In accordance with the Town & Country Planning (Development Management Procedure) (Wales) Order 2012, letters were sent to adjoining properties and a site notice was displayed within the vicinity of the site.

Two letters of objection were received following this publicity exercise. The main material points of the letters received related to the impacts on the locally listed building and wider conservation area.

The local Ward Councillors have been inform of the responses received in relation to this application. It has not been requested that the application be presented to the planning committee. As such, it will be determined under the delegated powers by the Director of Neighbourhood Services.

### Other matters raised by the objector

- Physical damage to the fabric of the building as a result of the proposal

In respect of this matter, the building is not a statutory protected building i.e. listed building and as such potential damage to its fabric is not a material planning consideration.

## POLICY CONTEXT

### National Development Framework

The Future Wales – the National Plan 2040 sets out a 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.

### National Planning Policies

Planning Policy Wales (PPW) Edition 12 (February 2024) sets out the land use policies of the Welsh Government. The most relevant paragraphs are:

Paragraph 3.9 refers to character and states that '*...the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process ...*'

Paragraph 3.10 refers to the importance of appropriate building materials and states that '*In areas recognised for their particular landscape, townscape, cultural or historic character*

*and value it can be appropriate to seek to promote or reinforce local distinctiveness. In those areas, the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important.'*

Paragraph 3.14 refers to context appraisal and states that these '*...should be used to determine the appropriateness of a development proposal in responding to its surroundings. This process will ensure that a development is well integrated into the fabric of the existing built environment...*'

Paragraph 6.1.14 refers to conservation areas '*...There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings. Positive management of conservation areas is necessary if their character or appearance are to be preserved or enhanced and their heritage value is to be fully realised. Planning authorities should establish their own criteria against which existing and/or new conservation areas and their boundaries should be reviewed...*'

Paragraph 6.4.3 discusses biodiversity and states that '*...the planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement...*'

The policies in PPW are supported by Technical Advice Notes (TANs). The most relevant TANs to this application are as follows:-

TAN (Technical Advice Note) 5: Nature Conservation and Planning – This TAN provides guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

TAN 12 – Design. This TAN advises that the Assembly Government is strongly committed to achieving the delivery of good design in the built and natural environment, which is fit for purpose and delivers environmental sustainability, economic development, and social inclusion at every scale throughout Wales.

The most relevant paragraph is, 5.6.2 which advises that '*In areas recognised for their landscape, townscape, architectural, archaeological and/or historic value, such as National Parks, Areas of Outstanding Natural Beauty, World Heritage Sites and conservation areas, the objective of sustaining character is particularly important and context appraisals should reflect this. The general aspects of the "character" objective of good design should be pursued but more detailed information may be needed in relation to key issues such as:*

- ***the setting and views*** of key buildings, landscape, parks and gardens, archaeology and skylines within, to and from the area;
- ***the degree of architectural unity or informality*** in building groups and settlements and in landscape;
- ***locally distinctive building elements*** and construction techniques, such as roof pitches, window proportions, parapets, or paving details;
- ***locally distinctive facing materials*** such as natural slate, brick quoins or natural stone in both buildings and the public realm;....'

TAN 24 - The Historic Environment. The purpose of this TAN is to provide guidance on protection and enhancement of the historic environment.

The most relevant paragraph is, 1.14 which refers to conservation principles and ‘... recognises that the whole of the historic environment is a finite and shared resource. Every place has its own history, which has shaped its character and leaves tangible traces in its present form and fabric. This historic character makes each place unique and gives it a distinctive identity. Historic character should be taken into account in the management of change in order to sustain local distinctiveness and a sense of place. The use of an objective, structured approach to identify the elements of historic character and creating an evidence base is vital...’

### Local Policy

Merthyr Tydfil County Borough Council Replacement Local Development Plan (LDP) 2016-2031:

- CW1 - Historic Environment Policy
- SW11 – Sustainable design and Placemaking Policy
- EnW1 – Nature Conservation and Ecosystem Resilience Policy
- EnW2 – Internationally and Nationally Protected Sites and Species Policy
- EnW3 – Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species

### Supplementary Planning Guidance (SPG)

- Note No. 4 – Sustainable Design Supplementary Planning Guidance (SPG)
- Note No. 5 – Nature and Conservation

### Other Relevant Guidance

The Borough’s Detailed Conservation Area Assessment (2020) (CAA).

The CAA contains a Spatial Analysis (Streetscape, Spaces, Places, Setting and Views). Of note is the following comment on the following view in which the proposal site is seen ‘Similarly, Church Street provides a view to the east focused on Thomastown synagogue, ....’

Cadw’s publication ‘Merthyr Tydfil: Understanding Urban Character’ dated 2015 (Understanding Urban Character) which notes the “Smooth rendered finish and simple classical detail on houses on Lower and Upper Thomas Street” and “bold classical detail on New Castle Street”. This document advises “The main development at Thomastown is a formal layout of terraced houses in long rows with a unified composition, sometimes given emphatic symmetry by the use of pedimented central and end gables, or given a strongly rhythmical treatment by the use of continuous string courses, emphasized by balanced end-gabled blocks.”

### PLANNING CONSIDERATIONS

The application site lies within the settlement boundary as defined by the LDP Proposals Map. Therefore, the principle of residential development is considered acceptable and is

generally supported by Policy SW4 of the LDP, provided that the proposal is compatible with other relevant policies and material planning considerations.

The main issues to be considered when determining this application are:

- The impact of the development on the character and appearance of the area and the Thomastown Conservation Area.
- The impact of the development on the amenity of neighbouring residents.
- Ecology. The impact of the development on the character and appearance of the area and the Thomastown Conservation Area.

### Visual impact

Essentially this proposal can be permitted if its design and visual impact does not have a detrimental effect on the special qualities of the Thomastown Conservation Area.

As noted above The Brunswick incorporates pedimented central and end gables, classic detail and string course with rendered elevations. In addition, there are views between The Brunswick and Listed buildings.

It is noted that horizontal cladding, or any form of boarded cladding is not a feature of the conservation area. Indeed, render is noted as a feature of the conservation area.

The introduction of horizontal cladding would detract from the classical detailing and string course which are architectural features of the property. The horizontal nature of the boarding would jar against the vertical emphasis of the pedimented gables.

Thus, the proposal would detrimentally affect the strong rhythmical treatment of the property and wider Conservation Area.

The proposal would not enhance or conserve views between the proposal site and the listed buildings identified above.

In summary, the proposal would not protect or enhance the character and appearance of the building or Conservation Area.

The proposal fails to meet with the requirements of LDP Policies CW1 and SW11.

### Residential Amenities

Due to the nature of the proposal, there would not be any significant detriment to the residential amenities of neighbouring properties.

The proposal meets the requirements of LDP Policy SW11.

### Ecology

The Council's Ecologist notes that the cladding would impact the bargeboards and therefore gaps accessible to roosting bat (or nesting bird) and advises a Preliminary Roost Assessment (PRA) of the site (undertaken by a suitably qualified and experienced ecologist) is required to assess any potential adverse impacts of the proposed works on priority and protected species and/or habitats.

It is considered reasonable that a PRA is submitted in support of the proposal. However, given the concerns on visual impact, it would be unreasonable to seek the submission of a PRA in this instance.

As noted in chapter 6 of Planning Policy Wales (edition 12), applications should be supported by Green Infrastructure Statements (GIS). Likewise, given the nature of development, this would not be deemed a reasonable requirement in this instance.

The proposal fails to meet with the requirements of LDP Policies EnW1 and EnW3.

### Conclusion

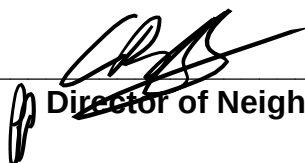
The duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 ("the WBFG Act") has been taken into consideration when determining this application. In reaching the following recommendation, the ways of working set out at section 5 of the WBFG Act have been considered and thus the proposal is in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers well-being objectives set out as required by section 8 of the WBFG Act.

Having regard to the policy context above, the proposal is considered to form development that does not enhance or protect the property or conservation area of which it is a part. It is also considered that insufficient information on potential impact on ecology has been submitted in support of the proposal. The following recommendation is made:

### **RECOMMENDATION: BE REFUSED** for the following **REASONS**:

1. The proposed cladding for reasons of its poor design and appearance would represent an unsympathetic addition to the Locally Listed Building, which would erode its historic character and appearance and would fail to either preserve or enhance the character and appearance of the Thomastown Conservation Area. As such, the proposal is contrary to Policies SW11 and CW1 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.
2. Insufficient information has been provided to adequately demonstrate that the proposal would not result in an unacceptable adverse ecological impact. Nor has it been demonstrated that a net benefit would be provided in respect of biodiversity. The development is therefore contrary to Policies EnW1 and EnW3 of the Merthyr Tydfil Replacement Development Plan and Planning Policy Wales Edition 12.

**RECOMMENDATION ENDORSED**



Director of Neighbourhood Services

**DATE: 16.09.2024**