

INTERNAL MEMORANDUM

To: David Cross - Development Control Case Officer
From: Planning Policy Team
Please ask for: Natasha Lade
Ext.: 6220

Date: 01 October 2020

Ref: P/20/0219

Observations in respect of the request for policy advice on planning application no. P/20/0219 at the former YMCA Building, Pontmorlais West, Street Merthyr Tydfil, CF47 8AT.

1. Proposed Development

The application submitted is for the repair and conversion of the vacant YMCA Building into offices including the construction of a replacement third floor (lost through fire in 2003) comprising a new roof with dormer windows and roof lights to provide additional accommodation. The proposal also includes the construction of a new car and cycle parking facilities on the upper plateau, with new vehicular and pedestrian access provided from Park Terrace and a new footbridge to allow level access into the building from the car park at the grade II listed former YMCA Building, Pontmorlais West, Merthyr Tydfil.

2. Development Plan Framework

National Planning Policy

Planning Policy Wales (Edition 10, December 2018)

Planning Policy Wales provides guidance on matters relevant to this application, namely:

- Strategic & Spatial Choices: Accessibility and Inclusive Design (paragraphs 3.5 – 3.13) & Promoting Healthier Places (paragraph 3.23).
- Active and Social Places: Sustainable Transport (paragraphs 4.1.10, 12, 15 & 20), Car Parking (paragraph 4.1.50 & 51) & Retail and Commercial Development (paragraphs 4.3.1, 35 & 45).
- Productive and Enterprising Places: Energy Efficiency (paragraphs 5.8.5 & 6).
- Distinctive and Natural Places: The Historic Environment (paragraphs 6.1.1 – 21 & 32), Biodiversity & Ecology (paragraphs 6.4.1 -8, 21 & 22), Water (paragraphs 6.6.9 – 13 & 19), Air Quality and Soundscape (paragraphs 6.7.5, 6, 7, 14, 19 - 21 & 24) & Lighting (paragraphs 6.8.1, 3 & 4).

Technical Advice Notes

Technical Advice Note TAN 18: Transport (March 2007)

Technical Advice Note TAN 5: Nature, Conservation and Planning (September 2009)

Technical Advice Note 12: Design (March 2016)

Technical Advice Note 24: Historic Environment (May 2017)

Local Planning Policy

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

The relevant LDP Objectives are -

- *LDP Objective 4: To promote the reuse of previously developed land and the continued regeneration of communities.*
- *LDP Objective 6: To promote high quality, sustainable and inclusive design and support measures, which mitigate the predicted effects of climate, change.*
- *LDP Objective 7: To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links.*
- *LDP Objective 9: To protect, enhance and promote all heritage, historic and cultural assets.*
- *LDP Objective 10: To improve ecosystem resilience and connectivity which support habitats and species of principle importance.*
- *LDP Objective 14: To develop the town and local centres as accessible, attractive, viable and vibrant places.*
- *LDP Objective 18: To promote the efficient use of resources and ensure an integrated network of waste management facilities.*

The following local development plan policies would apply: -

- *Policy SW4: Settlement Boundaries.*
- *Policy SW11: Sustainable Design and Placemaking.*
- *Policy SW12: Improving the Transport Network.*
- *Policy CW1: Historic Environment.*
- *Policy EnW1: Nature Conservation and Ecosystem Resilience.*
- *Policy EnW2: Internationally and Nationally Protected Sites and Species.*
- *Policy EnW4: Environmental Protection.*
- *Policy EcW3: Retail Hierarchy and*
- *Policy EcW5: Town and Local Centre Retailing Areas.*

The following Supplementary Planning Guidance is also applicable: -

- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 4: Sustainable Design (July 2013).*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 5: Nature and Development (May 2015).*

3. Policy Considerations

The Council has formally adopted the Merthyr Tydfil County Borough Council Replacement Local Development Plan (2016 - 2031). The proposal has therefore been considered against the policies contained within it.

The application site is located within the Town Centre, situated within the *Primary Growth Area* settlement boundary, where Policy SW4 applies. Here new development is considered acceptable in principle; subject to the proposal, being compatible with the Plan's other relevant policies and all other material considerations.

The application property lies within the Town Centre boundary, where Policies EcW3 and EcW5 apply. Policy EcW3 relates to the retail hierarchy, with the Town and Local Centres being the favoured locations for retail, leisure and other complementary uses where they improve the vitality and viability of the centre concerned. Offices use is a complementary commercial development offering business services considered appropriate for a town centre location. Policy EcW5 supports development that enhances the vitality and viability of the Town centre. Given that, the proposals will bring a currently vacant and partially derelict building into beneficial use it, is considered that they accord with Policy EcW5.

The application property is a grade II listed building, built in 1911, it was the first building designed by (Sir) Percy Thomas. Its main features comprise a 4-storey, 7-bay Edwardian Baroque facade with red brick facings and terracotta dressings, slate roofs with chimneys to end parapets together with many other architectural features. The building also lies within the Town Centre Conservation Area, the Town Centre (High Street and Pontmorlais) Urban Character Area, the Penyard Roman Fort and Environs Architecturally Sensitive Area (ASA) and the Merthyr Tydfil Landscape of Outstanding Historic Interest.

Accordingly, Policy CW1 is relevant, which aims amongst other things, to preserve or enhance the character and appearance of conservation areas, support localized management initiatives, regeneration and conservation schemes in relation to urban character areas and appropriately inform the process of change with regard to historic landscapes. To this end, the views of the Conservation Officer are pertinent. In addition, ASA designation highlights the archaeological significance of these areas where there may be a need for a developer to seek professional archaeological advice to ascertain the archaeological significance of a proposed development site. Given that the proposal involves demolition works and ground works in relation to the creation of car/cycling parking spaces the Glamorgan and Gwent Archaeological Trust (GGAT) should be consulted.

SW11: Sustainable Design and Placemaking advises that development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. It states that where appropriate, new development will be required, amongst other things, to:

- be appropriate to its local context in terms of scale, height, massing, elevation treatment, materials and detailing, layout, form, mix and density,
- integrate effectively with adjacent spaces, the public realm and historic environment to enhance the general street scene and create good quality townscape,
- allow access for the widest range of people possible and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards,
- Incorporate resource efficient/adaptable buildings and layouts using sustainable design and construction techniques,
- minimise the demand for energy and utilise renewable energy resources,
- provide and protect utility services and infrastructure without causing any unacceptable environmental impacts,
- incorporate measures to improve ground and surface water quality wherever possible,
- provide adequate facilities and space for waste collections and recycling, and
- promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour.

Policy SW12 recognises the transport hierarchy as outlined in PPW10, which supports development that encourages a modal shift towards sustainable transport, and therefore

development proposals should demonstrate how they intend to reduce the need to travel and encourage the use of sustainable transport.

Given that the proposal includes new vehicular and pedestrian access provision and the creation of car and cycle parking facilities and new footbridge, to allow level access into the building, it would be prudent to seek the views of the Highways and Drainage Engineer.

The proposals also include an element of ecological mitigation in relation to bat roosts. In this case, Policies EnW2 and EnW3 are also relevant. Policy EnW1 requires development proposals to maintain and enhance biodiversity interests and demonstrate how the impacts of development can be satisfactorily mitigated and acceptably managed by future management regimes. Policy EnW3 relates to internationally and nationally protected species that include bats. The view of the Council ecologist are therefore of relevance and importance.

Policy EnW4 states that development proposals will be required to demonstrate that they would not result in an unacceptable impact on people, residential amenity, property, and / or the natural environment from amongst other things:

- Pollution of land, surface water, ground water and the air.
- Hazardous substances.
- Noise, vibration, dust, odour nuisance and light pollution; or
- Any other identified risk to public health and safety.

To this end, the views of the Public Health Officer are relevant and where impacts are identified the applicant should be required to demonstrate that appropriate measures can be incorporated to reduce, or minimise the impact identified to the lowest possible acceptable level. Planning conditions can be imposed or legal obligation requested to secure any necessary mitigation and monitoring processes both during and post construction.