

PLANNING
STATEMENT
INC. Green
Infrastructure
Statement

**Former Cardigan
Memorial Hospital**

December 2023



Summary

Proposal:

Full planning permission for the construction of a mixed-use development which includes office workspace, café, residential development, storage building and associated works

Location:

Land at the former Cardigan Memorial Hospital, Pontycleifion, Cardigan, SA43 1DP

Date:

December 2023

Project Reference:

23.221

Client:

Wales and West Housing Association

Product of:

Asbri Planning Limited
Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff CF23 8RS

Prepared by:

Gwen Thomas – Senior Planner

Approved by:

Llinos Hallett– Principal Planner

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Introduction

- 1.1 This Planning Statement has been prepared on behalf of Wales and West Housing Association to accompany a planning application for the construction of a mixed-use development which includes office workspace, café, residential development, storage building and associated works at the Former Cardigan Memorial Hospital, Pontycleifion, Cardigan, SA43 1DP.
- 1.2 The purpose of this Planning Statement is to provide a clear and logical document to outline the planning considerations and planning policies relevant to the proposal. The document also acts as a method of demonstrating the details of the planning application in a way that can be read both by professionals and the public.
- 1.3 This Planning Statement acts as a supporting document for the accompanying planning application and should be read in conjunction with all other elements of the application which include the following documents:

Drawing name	Drawing reference
Site Location Plan	20041-GFA-ZZ-ZZ-DR-A-10002 rev 03
Existing Site Plan	20041-GFA-ZZ-ZZ-DR-A-10004 rev 03
Demolition Site Plan	20041-GFA-ZZ-ZZ-DR-A-10005 rev 01
Proposed Site Layout	20041-GFA-ZZ-ZZ-DR-A-10017 Rev 07
Ground Floor Plan	20041-GFA-O-00-DR-A-11501 rev 05
First Floor Plan	20041-GFA-O-01-DR-A-11502 rev 05
Second Floor Plan	20041-GFA-O-02-DR-A-11503 rev 05
Lower Ground Floor Plan	20041-GFA-O-LG-DR-A-11500 rev 05
Office Roof Plan	20041-GFA-O-RP-DR-A-11504 rev 05
Office Elevations	20041-GFA-O-ZZ-DR-A-12504 rev 01

Residential Floor Plans	20041-GFA-ZZ-ZZ-DR-A-11500 rev 01
Residential Elevations	20041-GFA-A-ZZ-DR-A-12510 rev 01
Cambria GA Plans	20041-GFA-CA-00-DR-A-11701 rev 04
Cambria Elevations	20041-GFA-CA-ZZ-DR-A-12702 rev 04
Site Boundary Treatments	20041-GFA-ZZ-ZZ-DR-A-10030 rev 01
Site Section AA	20041-GFA-ZZ-ZZ-DR-A-12024 rev 06
Site Section BB	20041-GFA-ZZ-ZZ-DR-A-12030 rev 07
Site Section CC	20041-GFA-ZZ-ZZ-DR-A-13026 rev 04
Site Section DD	20041-GFA-ZZ-ZZ-DR-A-12036 rev 05

1.4 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application forms (1APP)	Asbri Planning Ltd
Planning Statement	Asbri Planning Ltd
Design and Access Statement	Gaunt Francis Architects
Engineering Layout	CB3
Drainage Layout	CB3
Proposed Landscape Strategy	RDS Landscaping
Landscape Maintenance & Management Plan	RDS Landscaping
Heritage Impact Assessment	Holland Heritage
Tree Survey	RTAC
Preliminary Ecological Report	I&G Ecological Consulting
Flood Consequences Assessment	JBA

Transport Assessment	Acstro
Travel Plan	Acstro
Flood Consequences Assessment	JBA Consulting
Fire Strategy Report	HNLA

- 1.5 In terms of the content of the Planning Statement, this chapter is followed by a brief description of the site and its features which includes a contextual analysis regarding the local character and surrounding land uses. Subsequently, Chapter 3 provides an overview of the site’s planning history/context, followed by an outline of the proposed development in Chapter 4. Following this, Chapter 5 provides a summary of the supporting documents included within the application package. Chapter 6 then identifies the relevant national and local planning policies which provide the framework for appraising the proposed development. Meanwhile, Chapter 7 draws together the key points and conclusions from the supporting technical documents to demonstrate the overall appropriateness of the proposal in planning terms. Finally, Chapter 8 concludes why the proposal should be granted planning permission.

Site description

- 2.1 This section sets out the site's general location and provides a brief description of the application site and its immediate surroundings.

General location

- 2.2 The 1.085-hectare application site comprises of a plot of land situated to the south of Pont Y Cleifion Road which lies within the defined Town of Cardigan, in the administrative area of Ceredigion County Council.

The site

- 2.3 The site is characterised by the former Cardigan Memorial Hospital. The hospital closed in 2019 and is currently vacant. It partly comprises the remains of a building that has been adapted over the years however was originally designed by the notable architect John Nash.
- 2.4 Grassed areas are identified on the southern side of the site and are considered popular for walking, as an extension to St Marys' Street and the adjacent churchyard. The eastern side of the site comprises overgrown land, with vegetation along the eastern boundary. The site falls in level by approximately 4m from west to east, dropping away from the adjacent church.
- 2.5 A review of Natural Resources Wales' Development Advice Map shows the site lies within both Flood Zone A to the north-west of the site and Flood Zone C2 to the remainder of the site to the south. Flood Zone A is considered to be at little or no risk of fluvial or coastal/tidal flooding, whilst Flood Zone C2 is identified as an area without significant flood defence infrastructure.
- 2.6 The Historic Wales maps identifies that the Grade II* listed Church, St Mary's Church, is located immediately to the west of the site. No listed buildings or scheduled ancient monuments are located within the site boundary.
- 2.7 In addition, no Public Rights of Ways (PRoW) are identified within the site boundary.
- ### **Surroundings and vernacular**
- 2.8 The site is located south east of Cardigans Town Centre. It is bound by the Priordy Priory Bridge/ A487 to the east, by Pont-y-Cleifion which runs parallel to and provides access to the north of the site, with residential properties beyond.

- 2.9 To the west of the site is the identified Grade II* listed Church, St Mary's Church and car park. The Church and the car park are identified within the Cardigan Conservation Area which extends westwards from the site. The site is not included within this Conservation Area.
- 2.10 To the south, is the Afon Teifi which is a designated Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI).
- 2.11 Given the site's close proximity to the defined Town Centre, a number of supporting amenities and facilities are within walking distance of the site. These include:
- Primary School (Ysgol Gynradd Aberteifi);
 - Swimming and Leisure Complex;
 - Restaurants and café's;
 - Cardigan Castle;
 - Convenience Stores;
 - Banks; and
 - Post Office.

Access

- 2.12 As outlined above, historic vehicular access to the site was gained via the two existing entrances located at the northern boundary of the site from Pont y Cleifion. The main access is located towards the site's north eastern corner and is some 50m west of the A484/A487 roundabout. A secondary access is provided at the north western corner of the site. Pedestrian access is also located from the churchyard on the western boundary of the site.

Planning Context

Planning History

- 3.1 Planning records from Ceredigion Council identify varied historical planning applications at the site. These include:

Reference	Proposals	Date	Decision
A230804	Confirmation that the demolition of existing on-site structures comprise development	10-11-2023	Pending
A210510	Proposed demolition of building and the construction of mixed-use development which includes office workspace, residential development and associated works	20-09-2021	Approved Subject to Conditions
991027	Erection of two storey medical facilities together with associated car parking and highway alterations	14-01-2000	Approved Subject to Conditions.
870014	Certificate of Alternative Development - Residential Development.	Not Available	Refused
820564	Link Corridor	Not Available	No Objection
811069GD	Renewal of consent for 6 parking spaces and landscaping area	Not Available	Temporary permission
880577	Erection of 8 metre street lighting pole & antenna for monitoring station	Not Available	Approved Subject to Conditions

Pre-Application Advice

- 3.2 Whilst the pre-application advice detailed below pertains to the following permission Ref: A210510, the same principles have been applied to this new application. Therefore, it is considered appropriate for the details of the historic pre-application discussions to remain for review within this Planning Statement. Whilst no formal pre-application discussions have taken place with the Local Authority in relation to the new scheme, initial discussions have confirmed that the changes necessitate a new, full planning application but that officers considered the amended scheme to be acceptable and an improvement to the details approved under application reference: A210510.

3.3 Formal pre-application advice was sought from Ceredigion County Council (ref: Q210074) at the beginning of April 2021. A response was received on the 22nd April 2021 and a subsequent meeting held on the 11th May 2021. The pre-application response is summarised below and a response is provided in *italics*, where appropriate.

- The site is located within the Cardigan USC boundary and the Local Planning Authority acknowledge that there is very little architectural merit in the existing buildings on site, apart from the John Nash building.
- The setting of the building and site is considered to be of value, due to the grounds to the South and East and the fact that it forms a gateway to Cardigan.
- Policy LU22 – Community Provision is the first port of call where the LDP seeks to help sustain and enhance community provision by resisting the loss or change of use of an existing community provision unless an alternative provision of at least equivalent local community value can be provided within the settlement. A report will need to be submitted with the planning application for the change of use or loss of facility explaining why the loss or change of use is justifiable.

Please see Para 7.3 of this statement which confirms that the hospital use has simply relocated elsewhere within the town and as such there is no 'loss of community facility' but rather a relocation of. The hospital buildings proposed for redevelopment have been boarded up and closed since 2019.

- The site is within the town centre therefore subject to justification for the loss of a Community Provision under Policy LU22 and assessment of alternative uses the principal of development can be supported.
- The development must contribute to the overall sub-regional role of the settlement as set out within the Settlement Group Statement.
Please see para 7.4 of this statement which confirms that proposals will contribute to the overall sub-regional role as set out in the Settlement Group Statement.

- This site will be deemed as a 100% affordable housing development as the apartments are all social rented, it therefore exceeds the requirement for 20% affordable housing on all housing development sites. Criterion 3 of the policy allows "Permitting 100% affordable housing sites were justified by evidence of unmet affordable local need provided the location of the development is in line with Policies S02, S03 and S04. The occupancy of all affordable housing will be controlled in perpetuity in accordance with Appendix 4 of the LDP."
The site was transferred to Wales & West Housing Association through the Welsh Government Land Transfer Protocol in conjunction with Ceredigion County Council. The Council therefore supported and committed to the redevelopment of the site for social housing and

office accommodation at acquisition stage. Further, the Councils House officer has confirmed that there are 43 older persons on the register in need of a 1 bed home and a further 36 persons who are mobility impaired also in need of a 1-bed home in the Cardigan area. It is without question that this proposed provides a real supply for the demand for this style of accommodation in Cardigan.

- All housing developments should seek to meet the 'Lifetime Homes' standards as far as reasonably practicable and provide a mix of dwelling types and sizes to help secure a balanced housing stock in the local area. *Proposals are designed to DQR and lifetime home standards.*
- The mix of housing is really important and if the development is going to be for one-bedroom apartments this needs to be justified with a significant level of evidence and from WWHA's own policies and housing need.

Evidence taken from the Council's housing register supports the development of older persons housing. It is common for older person's housing developments to be one-bedroom apartments and not a mix of sizes. WWHA own 3,500 older persons housing, the vast majority of which are one bedroom, and where WWHA have two bedroom apartments these are almost always under-occupied. As result of this evidence, WWHA recent older persons scheme (82 flats in Cardiff, 44 flats in Rhyls, 33 flats in Flint plus two extra care schemes) have exclusively one bedroom or with minimal two bedroom flats. The bjective in planning terms for a blend of dwelling types and sizes is to support the creation of a mixed community. In the case of this scheme, WWHA are seeking to create a self-sustaining and supportive older community of people that need that type of environment in order to live well and independently. WWHA are flexible and no don't operate a hard age criterion, instead operate a more sensitive lettings approach whereby the scheme is occupied by predominantly older people and a smaller number of younger people that need a more 'sheltered' living environment. Often the younger people will be those with learning and/or physical disabilities.

- The policy should be taken into consideration however only a portion of the site is developable and as they are for apartments it exceeds the guide density per ha for an Urban Core which is 30-80 units. In order to allow higher densities good design must be ensured in order to avoid any detriment to amenity and the quality of the natural and built environment. The LPA are of the view that the proposed development, in particular the three storey dwelling elements along the road side are an over development of the site and do not respect the surrounding built form.

The proposed nature of the scheme, notably the delivery of only apartments naturally increases the density. The proposed 4 x 3 storey dwellings fronting Pont-y-Cleifion have been sensitively design, insofar that they work with the levels and result in a proposal which stands at

2.5 storeys in terms of ridge height. Further a daylight/sunlight assessment has been completed to assess the impact of this massing on the adjacent properties, and the assessment concludes that there is no detrimental impact as a result of the proposals.

- A resident's green area is proposed within the courtyard, and a detailed landscaping plan of this area should be submitted along with native species planting. The LPA would require the whole site to be landscaped and accompanied by a landscaping plan. By doing so the health and wellbeing of the community will be enhanced and social cohesion will be encouraged. *A landscape Scheme design has been completed and is submitted to accompany the planning submission.*
- This site is within close proximity to the bus station and is within walking distance to the town centre. Parking provision should be in line with the Ceredigion SPG on Parking Standards. *Parking has been provided inline with the Councils SPG.*
- Providing a new 1.8m footpath along the site frontage would be a planning gain and would enhance the development site in terms of providing safe walking opportunities.
- The LPA are of the view that the site encourages movement with no dead-ends and paths linking easily with the town whether that is through the church or via the main road. The LPA would also encourage the use of cycles, it is for the submission to demonstrate that the development is 'legible'
- The landscaping scheme should relate not only to 'soft' landscaping i.e. trees, hedges, planting etc but also hard landscaping i.e. stone walls, drives, and pavements. The submission recognises the use of Cilgerran stone, and in addition a similar brick to the Cardigan Red Brick should also be used in the design process and used where possible on archway features etc. and within the designs of the blocks along the road frontage.
- The proposal includes the removal of the additional floor on the Nash house and reconstruct its original pitched roof and chimneys which the LPA have no objection to and welcome.
- The site is not allocated within the LDP for employment purposes. However the scale of the B1 use is 800m² and thus falls within the threshold envisaged under Policies S02 and S04. The density of the development should be appropriate in relation to its location and proposed use and that it's demonstrated that the re-use of the redundant or underused buildings within the area have been considered. With changing patterns in working since the Covid-19 pandemic there may be office spaces already available, or there may not be a requirement for such a large office building.

Prior to purchasing the former hospital WWHA explored many potential sites and buildings in South Ceredigion, North Pembrokeshire and North West Carmarthenshire. WWHA drew up a shortlist and visited all the potential locations and none were as suitable as the

hospital site. The Association wants a site that is prominent – this is the regional office for the whole Group of companies, a site that allows for the provision of a high quality office environment and one that allows for all elements of the Group to be located in one place. WWHG has about 60 staff working in the west region for the housing association, about 30 for Cambria which is expanding quickly and about 20 for Castell Care and Support which will more than double over the coming 12 months. Originally, WWHA were looking for an office of about 1000-1200m² to accommodate most of the housing staff, a deport type building for the Cambria and sufficient hotdesks and meetings room for Castell and visiting staff from the other regions. The pandemic has resulted in changing working patterns within the Group which is why WWHA have scaled down the size of the new office building. The current design reflects what WWHA expect new working arrangements to be and now includes more meeting room space, 'booths' for video-conferencing calls and small areas of hotdesks. WWHA no longer expect significant numbers of staff to visit the office every day and the size of the building would now not allow this. WWHA expect the building to be used daily by a small core of support staff and 10-20 other regular users that dip-in from time to time other the course of week.

- The design of the proposed office block is not considered to be acceptable to the Local Planning Authority. It's felt that it dominates the development, being in the form of a flat roof block over three storeys. It's not considered to be subservient to the Nash house and does not respect the setting of the listed building.
A photomontage has been completed which seeks to show in a more 3D fashion, the proposal and the impact of the development on the Nash House. The scheme has been sensitively design with input from a heritage consultant to ensure that a sensitive and ambitious intervention can be delivered.
- Consideration must be given to the likely impact of the development on existing retail provision within the Service Centre. There is some concern by the LPA that the Cafe would draw people to the site, where parking is convenient and will reduce footfall within Cardigan Town Centre and along its primary and secondary frontages where A1/A3 should be located. A3 uses should not cause unacceptable disturbance to the occupiers of nearby properties or adversely affect amenity. Retail Proposals in Urban Service Centres stresses that development should not have a significant negative individual or cumulative impact on the vitality and viability of the existing town centre.
The proposed café area is small in scale and offers a community use on site which was deemed to be important by the people of Cardigan, given the sites historic use and also the heritage importance of the Nash House which should be enjoyed by all. Access to the car park will be managed fully by WWHA and visiting member of the public, who

wish to access the café will only be permitted to do so by foot. It is envisaged that people will walk from the town, via the public footpath which passes the Church, and into the site.

- This development is directly adjacent to the Afon Teifi SAC. The works will involve the demolition of a number of buildings and the construction of new residential and commercial buildings. The development poses a number of risks to the SAC namely pollution (dust, debris, sediment, construction materials, surface water runoff) and disturbance (noise, vibration, lighting) to otter and migratory fish that use this part of the SAC. Under Regulation 63 of the Habitats and Species Regulations 2017 the LPA will need to carry out a Habitats Regulations Assessment in order to demonstrate no significant effect of the development on the designated features of the Afon Teifi SAC (or the Cardigan Bay SAC 4km downstream). In order to inform this assessment, further information should be submitted such as a Construction Environmental Management Plan, surface water management plan, lighting plan and Reasonable Avoidance Measures Method Statements (RAMMS) for otter and migratory fish, that specifically demonstrate how impacts on the SAC and the designated features are to be avoided/mitigated.

Public and Stakeholder Engagement

- 3.4 Due to the fact that the same principles apply to the newly prepared scheme and due to the non-contentious nature of the changes made, it is not proposed to conduct a public engagement event for the new scheme. Notwithstanding, the proposals are subject to statutory Pre-Application Consultation, a period during which adjoining land owners/occupiers and statutory, technical consultees will be afforded an opportunity to review the draft application package and share comments as desired.
- 3.5 The previous application was subject to public and stakeholder engagement efforts, detailed below.
- 3.6 Between late December 2020 and February 2021 a number of stakeholder and public engagement events were conducted by Gaunt Francis Architects (GFa) to understand the views about the site and its potential. Overall, an overwhelmingly positive response was received to the proposed plans.
- 3.7 In February 2021, GFa hosted website films of the proposed scheme (bilingually) on their website. Those films were viewed by the general public more than 1,200 times (as of 14 April 2021). Following this, on 18 February 2021 GFa presented the scheme, virtually, to the Design Commission for Wales.

- 3.8 The Commission viewed the proposals very positively, though also suggested some amendments which were taken up by the design team, notably, to move the 'back-of-house' facilities (bins, buggys, plant etc) from the ground floor of Block D into Block C, and several smaller impact suggestions. The Commission was supportive of the scale and form of the proposed scheme, and applauded WWHA's ambition for a zero-carbon brief.
- 3.9 Following this, in order to showcase and discuss the proposals with local residents and local councillors, a number of virtual public events were arranged for the 25th, 26th and 27th of February 2021. Additionally, a press notice was published within both the Cambrian News and Teifi Side.
- 3.10 The public engagement event was arranged and led by GFa to ensure that any questions raised were comprehensively addressed. The event itself was limited in attendance however was a positive exercise in that it allowed the design team to explain the rationale behind matters such as principle of development, design, layout, scale, and highways. It also demonstrated the positive reaction to the proposals and the level of interest in the delivery of the proposed development.

Pre-Application Consultation

- 3.11 Further to the above and in accordance with Part 1A of "The Town and Country Planning (Development Management Procedures) (Wales) (Amended) Order 2016" (DMPO 2016), all major developments are required to be subject to pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority. The PAC process was seemingly positive and as such, only minor changes have been made to the proposals following this exercise.

Proposed Development

Originally consented scheme and proposed changes

- 4.1 The originally consented scheme comprised a mixed-use development which included 34 self-contained one-bedroom apartments, office workspace for Wales & West Housing Association, a maintenance storage building and a small-scale community provision. To facilitate the development, demolition was proposed on site. This included the existing Hospital buildings and the reduction of the Church Boundary wall which is Grade II* listed.
- 4.2 As detailed within the submitted Design and Access Statement, a (post-Covid) review of the scheme highlighted a number of issues which made the permission as it stood, unviable. The issues related to a significant increase in the cost of building materials, a significant flood event affecting the car park and concerns regarding resident parking provision. In light of the concerns raised, the scheme has been amended as follows;
- To reduce the number of apartments proposed, from 34 to 20 one bed units;
 - To provide one-to-one resident's car parking (i.e. 20 spaces);
 - To lift all car parks above flood event levels;
 - To improve the gross/net development ratio of the residential element;
 - To reduce the scale of the proposed Cambria building.

As confirmed within the DAS, no changes, in principle, were to be made to the office building or to the quantum of office car parking. A key client requirement for the revised scheme was that the new residential terrace fronting Pont y Cleifion should be retained in the scheme

Residential

- 4.3 The proposed development includes 20 one-bedroom apartments for the elderly, located to the north west of the site. The apartments will not be available for open market sale and residents will be selected from Ceredigion's housing lists. The apartments will be arranged in a courtyard design, focusing on a new landscaped central space which allows appropriate distance to St Mary's Church.
- 4.4 The design of the apartments has been influenced by the zero carbon ambitions of the client; therefore, all apartments are dual-aspect to create an energy balance to take advantage of passive solar gain during the colder months and can avoid overheating in the summer. As detailed on the submitted plans and within the DAS, a 'deck' access' arrangement is proposed whereby the decks will be external

unheated spaces, where lighting is only required during night-time hours. This addition necessitates the removal of the resident balconies shown on the previously consented scheme. They have been replaced by sitting areas within the new vestibule arrangement.

- 4.5 The design has been progressed with residential amenity in mind and all bedrooms will look out over Pont Y Cleifion, with all lounges enjoying a south facing aspect. Furthermore, space for plant, resident buggy's, refuse and recycling is planned close to the main entrance at Block C.

Offices and Nash House

- 4.4 New office space for WWHA is proposed within the southern part of the site, including the retained Nash house which will form a three storey addition to the site. The proposed offices will be located on the ground, first and second floors. The new-build element of the office building will have its main entrance on the eastern elevation, facing the proposed car park, and will be connected to the Nash house by a new glazed atrium.

- 4.5 The client brief for the office space requires a series of large and small meeting room spaces, alongside a mix of working environments for staff. It is considered that this can be achieved without the need to retain the 1920's additional storey on Priory House (which if retained would require an additional fire escape). In turn and as per the 2021 permission, the proposal is to remove the additional floor and reconstruct its original pitched roof and chimneys.

- 4.6 Within the retained Nash house, a new community facility is proposed at the ground floor level. This new public cafe will be serviced from a new central kitchen, which can also serve the WWHA office space to ensure it becomes a sustainable business venture in its own right. WWHA will be supporting the operation of the café by a local social enterprise.

- 4.7 The new public café/ hub will have extensive views over the river, and local residents will enjoy use of the south facing gardens. There will be the opportunity for the public café area to double up as a display/museum feature showing the history of the site, and the café will be fully wi-fi facilitated so that it can also operate as a workplace for local people. Crucially, the original internal curved Nash stair will be re-used as a fire escape from the WWHA offices above, and be available for the public to see in the café entrance hall.

Cambria Maintenance Building

- 4.7 A maintenance/storage building is proposed on the north side of the car park near the main vehicle entrance, where it can be built above the prevailing flood levels. This building will provide storage space for maintenance equipment and replacement fittings for residents. It is not intended that any staff are permanently based here. A new electrical sub-station is also proposed.

Access and parking

- 4.8 The submitted layout confirms that 53 car parking spaces are proposed. 20 no. spaces inc. 3 disables are proposed for the residential accommodation with 33 WWHA staff car parking spaces shown south of the Cambria building.
- 4.9 The existing two points of access to the site from Pont y Cleifion will be removed, permanently stopped-up and replaced by a single point of access at the north of the site. The access will be 6m wide and has been designed to accommodate a refuse vehicle. Visibility splays of 2.4m x 43m will be available in both directions from the new access, providing adequate stopping sight distance for drivers approaching at the 30mph speed limit.
- 4.10 A footway is provided adjacent to the access. A separate pedestrian access to the development is to be provided from Pont y Cleifion near the site's north western corner. Pedestrian access to the site from the neighbouring churchyard is also available. The open space to the south of the site will remain open for the general public to walk through and an improved circular walk is proposed around the eastern edge of the site, close to the river edge.
- 4.11 The site's existing boundary wall along Pont y Cleifion will be removed and a 2m wide footway provided alongside the carriageway where none currently exists.

Scale and Materials

- 4.12 The entire scheme will draw its scale from the original Nash house and the surrounding context. The majority of the scheme will be limited to two stories, with an additional storey within Block C at the eastern end of Pont y Cleifion.
- 4.13 The scheme is inspired by the character of the town centre conservation area. The north elevation is proposed as an eclectic mix of brick and painted render. We propose using two brick colours - a mid-range red, and a charcoal grey. The intention is to introduce an informality across the façade by using rainwater downpipes to separate finishes. As detailed within the DAS, strong colours are also proposed using painted render.

- 4.14 On the southern elevation, Priory House will be finished in a stucco render and hand painted in an off-white shade. The new-build office component will be faced in stone. Whilst Cilgerran is the local stone, the quarry has been closed for some time, and so an alternative will be sought, assuming not enough can be reclaimed on site. The new-build element will be set back from the Nash frontage, and the stone finish will contrast with the painted stucco of Nash, so that the latter becomes the principal feature in views from the south.
- 4.15 The public footpath through the churchyard will focus on the new Priory House's west elevation. This will be finished in the same painted stucco as the south, under a Welsh slate roof. As outlined above, the intention is to re-fit the entrance door that has been stored on site, which appears to have been in use during the 19th century.

Demolition

- 4.16 The 2021 permission allowed for the demolition of a number of existing on-site structures. The permission included for the demolition of the existing 20th century hospital buildings. Additionally, the tall stone boundary wall located at the north of the site will be demolished. It is proposed that the stone of the wall will be retained and re-used within the construction of this scheme.
- 4.17 The design layout proposes to create space around the Church through the creation of a courtyard for the elderly residents of the apartments. Developers have been in discussions with the Church in regard to incorporating the Grade II* Listed Church as part of the courtyard setting. In turn, the proposal includes the reduction of the boundary wall. The courtyard's privacy and security is ensured by a proposed set of railings which intend to free up the eastern end.
- 4.18 The intention is also to demolish the small WC/maintenance store owned by the Church, located at the northern side, against the boundary wall. A new WC will be constructed inside the church's choir vestry at the western end of the church to offset this loss.

Boundary Treatment & Landscaping

- 4.19 This application is supported by a landscaping plan, prepared by Rds Landscaping. The accompanying layout has been developed to retain the majority of the existing buffer and to provide a softer edge to the boundaries of the development with the majority of the trees and vegetation to the east retained. This aims to reduce the visual impact of the site on the surrounding area.
- 4.20 The landscaping scheme aims to optimise visitor experience through

the extensive site grounds, and to help reinforce the community benefits of the central courtyard. A reasonably formal arrangement is proposed, but nevertheless, a space where residents can gather and socialise with seating available.

- 4.21 A Sensory Garden is proposed to sit south west of the resident's courtyard – such a space will respond directly to the needs of the development's elderly residents.

Supporting documents

- 5.1 The following section intends to provide a brief overview of the supporting documents and reports which have been prepared to accompany the planning application for the proposed development.

Transport Assessment

- 5.2 This application is supported by both a Travel Plan and Transport Assessment, prepared by Acstro. The Statement concludes that that the proposal meets planning policy requirements in terms of being in an appropriate location that is safely accessible by a range of transport modes and that the impacts of the development on the continued operation and safety of the surrounding highway network would be acceptable.

FCA and Drainage Strategy

- 5.3 JBA Consulting have prepared a Flood Consequence Assessment (FCA) for the proposed development, as the site is partially located within Flood Zone C2. It concludes that the proposed development has been designed using a sequential approach that has endeavoured to allocate the most vulnerable parts of the development to the lowest risk areas.
- 5.4 The submitted FCA reflects the raising of levels that is proposed as part of this application. All finished floor levels have also been set above the 0.5% plus climate change flood levels, with residential blocked raised above the 0.1% AEP plus climate change level. Furthermore, the FCA confirms how the design of the site, the raising of the finished floor levels, and the proportionate raising and sloping of other areas will manage the risk of flooding appropriately.
- 5.5 It suggests that the proposed development satisfies the Justification Test requirements, including managing flood risk in line with the acceptability criteria. It is therefore considered that the development meets the principles and requirements set out in TAN-15 and the aims of Planning Policy Wales.
- 5.6 In addition, the application is accompanied by a Drainage Strategy prepared by CB3 Consult. The drainage strategy confirms how surface water will be managed following the completion of the development. It is proposed that the foul drainage will be connected to the existing mains sewer. The proposed surface water drainage strategy comprises of a network of SuDS assets. It is also noted that the drainage strategy for surface water will be developed with regard to Schedule 3 of the Flood and Water Management Act 2010 and will

therefore require a separate drainage consent from the Council's SAB Authority.

Ecology

- 5.7 This application is accompanied by a Preliminary Ecological Appraisal prepared by I and G Ecological Consulting. The PEA confirms that the majority of the land is improved and semi-improved amenity, grassland, missed shrub and scattered trees. The site also includes an area of rank grassland, scrub and an area of standing water. The PEA concludes that the majority of the land within the boundary has only negligible ecological value.

Trees

- 5.8 There are a number of trees identified on the site. Due to this, a Tree Survey supports this application.
- 5.9 The Report concludes that the proposed development will have no detrimental impact on the existing trees at this site. The trees to be removed are as follows;
- Three trees, T451, T459 and T477 are in poor condition and need to be removed.
 - T450 will need to be removed to enable the construction of the new parking area. This tree is a small C category tree, and the loss of this tree will not be detrimental to the amenity value of the site. A small group of young self-set ash trees will also be removed.
 - T472, T473, T474, T475 and T476 will need to be removed to excavate the SUDS drainage basin.
- 5.10 Where trees are lost, mitigative planting is proposed as part of the landscape scheme. Where trees are being retained the layout will be developed to have due regard to the root protection areas of the trees concerned. As such it is concluded that any potential impacts with regards to arboriculture are considered negligible and can be addressed through the implementation of construction protection measures.

Design & Access Statement

- 5.11 A Design and Access Statement has been submitted in support of the application. The statement was prepared by Gaunt Francis Architects and explains the various facets of design and access in relation to the site alongside outlining planning policy relevant to the proposal. The statement also explains how the proposal complies with the 5 principles of good design identified in TAN12.

Heritage

- 5.12 The application is supported by a robust Heritage Impact Assessment, prepared by Holland Heritage. This report sets out the heritage significance of the former Cardigan Hospital site and has assessed the proposed scheme. It concludes that the heritage significance of the house designed by John Nash has been compromised by alterations in the last century under operation as a hospital. The aesthetic qualities of the original design have been harmed by the institutional additions and changes. Although the former Priory House can still be identified in analysis of the site, internally, the only major feature to remain is the staircase.
- 5.13 The report states that the proposal has increased understanding of the heritage of the site and created a design that, if implemented, will protect what remains of most significance and enhance the setting of the church. Prior to any demolition it recommends that building recording must be carried out and the resulting record deposited in the appropriate Historic Environment Record. Overall, this Heritage Impact Statement concludes that the proposed scheme will have a positive heritage impact.

Fire Strategy Report

- 5.14 This application request is supported by a Fire Strategy Report prepared by hnl fire engineering. The report notes that it acts as a basis for compliance with Part B of the Building Regulations 2010 as amended. The report confirms that the design has been reviewed by Ceredigion County Council Building Control.

Archaeological Technical Note

- 5.15 The application is supported by an Archaeological Technical Note prepared by EDP. The report concludes that due to the fact that the archaeological potential of the site is well understood, archaeological mitigation of the area to the north west could be appropriately and proportionately dealt with through the imposition of an appropriately worded planning condition.

Planning policy context

Introduction

- 6.1 The planning policy framework for the determination of this application is provided by the content and scope of national planning guidance, together with the adopted Ceredigion Council LDP. National Planning Policy is largely contained within Future Wales (The National Plan to 2040) and Planning Policy Wales (PPW) – 11th Edition, published by the Welsh Assembly Government on February 2021. PPW is supplemented by 21 Technical Advice Notes (TANs), the relevant TANs will also be discussed within this chapter.
- 6.2 The Development Plan for the purpose of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 is Ceredigion Local Development Plan (2007-2022) which was adopted in April 2013. The adopted LDP provides the statutory framework for the development and use of land within the plan area during the Plan period (2007-2022).

Future Wales

- 6.3 Published on the 28th February 2021, Future Wales comprises the first development plan of its kind within Wales. It is a development plan with 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
- 6.4 Future Wales' spatial strategy is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years. The strategy blends the existing settlement patterns and the distribution of jobs and homes with a vision of managing change and future trends for the benefit of everyone in Wales.
- 6.5 The National Plan acknowledged the urgent actions and changes in behaviour that were introduced in response to the COVID-19 pandemic and how they will emerge as permanent features of life. These include using spaces differently, travelling less and spending more time working from home. The Nation Plan notes that the planning system must respond to these changes and contribute to a sustainable recovery, shaping places around a vision for healthy and resilient places. Planning Policy Wales is the primary source of detail on how the planning system will support reconstruction efforts.
- 6.6 Future Wales divides Wales into four regions, North, Mid Wales, The South West and The South East. Page 162 highlights how 'Across the

South East there are a range of strategic issues. Many of these issues have national, regional and local dimensions and will be delivered through co-ordinated action at all levels.'

6.7 The National Plan identifies 11 outcomes that can be achieved over the next 20 years if the planning system – through Future Wales and other development plans – is focused on the long-term and provides quality development in the right places for the right reasons. These Outcomes are inter-related and inter-dependent, and will improve places and well-being across Wales. The intention is to create 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

6.8 Policy 1 (Where Wales will grow) confirms that whilst 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. These comprise;

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

6.9 The National Growth Areas are complemented by Regional Growth Areas which will grow, develop and offer a variety of public and commercial services at regional scale. There are Regional Growth Areas in three regions:

- The South West;
- **Mid Wales (The Teifi Valley, including Cardigan);** and
- The North.

6.10 Policy 2 (Shaping Urban Growth and Regeneration) confirms that “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.*
- *Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time”.*

6.11 Policy 8 (Flooding) confirms that flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.

6.12 Policy 25 (Regional Growth Area – Mid Wales) confirms that;

The Welsh Government supports sustainable growth and development in a series of inter-connected towns across the region. Development in these Regional Growth Areas should meet the regional housing, employment and social needs of Mid Wales. The Regional Growth Areas are:

- *The Teifi Valley, including Cardigan, Newcastle Emlyn, Llandysul and Lampeter;*
- *Brecon and the Border;*

- *The Heart of Wales, including Llandrindod Wells and Builth Wells;*
- *Bro Hafren, including Welshpool and Newtown; and*
- *Aberystwyth.*

The Teifi Valley in the south-western part of the region overlaps the South West region and includes the attractive market towns of Tregaron, Lampeter, Llandysul, and Cardigan. It provides connecting infrastructure that is used and relied on by the resident population and the communities around them. While Cardigan and Llandysul serve rural hinterlands beyond the region, places outside the region like Newcastle Emlyn similarly serve communities in Mid Wales. It is important that the respective adjoining development plans are aligned and recognise how services and community facilities are used and are beneficial to people in each region.

- 6.13 It is confirmed that Cardigan is identified in policy 1 as a Regional Growth Area where development will be directed. This will be supported by policies 2, 3, 6 and 8 which will ensure that development in the region's towns is sustainably located in areas with good access to public transport where reliance on the car can be reduced.

Planning Policy Wales

- 6.14 PPW Edition 11 was adopted by the Welsh Government in February 2021 and is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications. PPW 11 sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.
- 6.15 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 and other key legislation. PPW and Future Wales set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).
- 6.16 Sustainable development is defined as:
“Sustainable development” means 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. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. "

- 6.17 Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Plans at all levels of the development plan hierarchy must be prepared in accordance with national planning policies. Planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.
- 6.18 The aforementioned Well-being of Future Generations Act is further explored in Section 1 of PPW, within which the 7 goals are further discussed. The goals are intended to shape the work of all public bodies in Wales and are listed as follows:
- *A prosperous Wales;*
 - *A resilient Wales;*
 - *A healthier Wales;*
 - *A more equal Wales;*
 - *A Wales of cohesive communities;*
 - *A Wales of vibrant culture and thriving Welsh language; and*
 - *A globally responsible Wales.*
- 6.19 Under Section 2 – People and Places – Achieving Well Being Through Placemaking, 5 Key Planning Principles are highlighted, under the general heading of Achieving the Right Development in the Right Place which are:
1. *Growing our economy in a sustainable manner*
 2. *Making best use of resources*
 3. *Facilitating Accessible and Healthy Environments*
 4. *Creating and Sustaining Communities*
 5. *Maximising environmental protection and limiting environmental impact.*
- 6.20 Placemaking is a key thread running through the 11th Edition of PPW. It is described as an *"inclusive process, involving all of those with a professional or persona interest in the built and natural environment, which focuses on developing plans, making decisions and delivering developments which contribute to the creation and enhancement of sustainable places."*

- 6.21 PPW emphasises 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.
- 6.22 Previously developed (also referred to as brownfield) land 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.
- 6.23 Section 4 – Active and Social Places defines those places which promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities. Places which are active and social contribute to the seven goals of the Well-being of Future Generations Act. The key issues in this theme include:
- *ensuring there is sufficient housing land available to meet the need for new private market and affordable housing;*
 - *assisting in the delivery of cohesive communities which will meet the needs and are accessible to all members of society, including older people;*
 - *tackling inequalities between communities, delivering services and jobs closer to where people live and acknowledging the importance of inclusive communities and the wider environment for good health and well-being;*
 - *improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles*
- 6.24 Section 6 – Distinctive and Natural Places – this theme covers environmental and cultural components of placemaking. It states:
- “The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These features give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles.”***
- 6.25 PPW recognises that all the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places.

Technical Advice Notes

6.26 Planning Policy Wales is supplemented by 19 topic-based Technical Advice Notes (TANs). The most relevant to this application are discussed, in turn, below:

TAN 5: Nature Conservation and Planning

6.27 This Technical Advice Note (TAN) was produced in 2009 and summarises issues relevant to nature conservation and planning. The purpose of TAN 5 is to provide advice regarding how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation, which states as follows:

“The biodiversity conservation and enhancement is an integral part of planning for sustainable development. The planning system has an important part to play in nature. The use and development of land can pose threats to the conservation of natural features and wildlife. But development can also present significant opportunities to enhance wildlife habitats and the enjoyment and understanding of the natural heritage. Whilst the planning system needs to be watchful of the cumulative effects of a series of small, perhaps occasional, apparently insignificant losses from the natural world, which we can combine to seriously deplete the natural heritage, including essential hydrological and ecological systems; small scale opportunities for habitat creation and enhancement can be significant and can build into major contributions over time.”

TAN 12: Design

6.28 This Technical Advice Note was revised in July 2014 in order to update new requirements, including those for Design and Access Statements. The purpose of TAN 12 is to provide advice on design considerations and the role of the planning system in supporting sustainable and innovative design solutions. In relation to housing design, it states (Para 5.11.2) that local planning policy and guidance 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; and*
- *consider and balance potential conflicts between these criteria.*

6.29 This TAN also provides a definition of “character” which is contained within the guidance on designing in context:

“..... Appraising “character” involves attention to topography; historic street patterns, archaeological features, waterways, hierarchy of development and spaces, prevalent materials in buildings or floorscape, architecture and historic quality, landscape character, field patterns and land use patterns, distinctive views (in and out of the site), skylines and vistas, prevailing users and plan forms, boundary treatments, local biodiversity, natural and cultural resources and local distinctive features and traditions (also known as vernacular elements).”

TAN 15: Development and Flood Risk

6.30 This TAN was adopted in 2004 and provides technical guidance which supplements the policy set out in Planning Policy Wales in relation to development and flooding. It advises on development and flood risk as this relates to sustainability principles, and provides a framework within which risks arising from both river and coastal flooding, and from additional run-off from development in any location, can be assessed.

6.31 It outlines the justification of new development within flood zones, stating:

New development should be directed away from zone C and towards suitable land in zone A, otherwise to zone B, where river or coastal flooding will be less of an issue.

All other new development should only be permitted within zones C1 and C2 if determined by the planning authority to be justified in that location. Development, including transport infrastructure, will only be justified if it can be demonstrated that:-

- i. Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; or,*
- ii. Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an*

- existing settlement or region; and,
- iii. It concurs with the aims of PPW and meets the definition of previously developed land (PPW fig 2.1); and,
- iv. The potential consequences of a flooding event for the particular type of development have been considered, and found to be acceptable.

TAN 18: Transport

- 6.32 TAN 18 (2007) identifies that influencing the location, scale, density and mix of land uses and new development can help reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport. With respect to development, TAN 18 states:

It should be a key aim to identify residential sites that are accessible to jobs, shops and services by modes other than the car and where public transport services have the existing or planned capacity to absorb further development. Local authorities should seek to achieve a broad balance between housing and employment opportunities to minimise the potential need for long distance commuting.

TAN 20: Planning and the Welsh Language

- 6.33 TAN 20 (2017) provides guidance on how the Welsh language may be given appropriate consideration in the planning system and on compliance with the requirements of planning and other relevant legislation. It states:

The planning system can contribute to the future wellbeing of the Welsh language, by establishing the conditions to allow sustainable communities to thrive. For example, creating conditions for well-paid employment opportunities and a range of quality housing options are integral to planning for sustainable communities.

TAN 23: Economic Development

- 6.34 TAN 23, adopted in 2014, defines economic development broadly so that it can include any form of development that generates wealth, jobs and income.
- 6.35 Paragraphs 1.2 (1-2) highlight that the economic benefits of proposals and market needs should be fully considered when determining planning applications:

1.2.1 - The economic benefits associated with development may be geographically spread out far beyond the area where the development is located. As a consequence, it is essential that the planning system recognises, and gives due weight to, the economic benefits associated

with new development.

TAN 24: The Historic Environment

- 6.36 It is acknowledged that historic buildings help give Wales its special character and make it distinctive. The need to preserve the best examples has long been recognised in legislation. Individual buildings of special architectural or historic interest have been given special protection in planning law, in particular the Planning (Listed Buildings and Conservation Areas) Act 1990, complemented by the Historic Environment (Wales) Act 2015.
- 6.37 This TAN (2017) places emphasis on 'Conservation Principles for the Sustainable Management of the Historic Environment in Wales' were published in 2011 and provide the basis upon which Cadw discharges certain statutory duties on behalf of the Welsh Ministers. Cadw has also published other relevant best practice guidance documents, including the 'Setting of Historic Assets in Wales' and 'Heritage Impact Assessments in Wales' (both 2017).

Ceredigion Council Local Development Plan

- 6.38 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decision should be made in accordance with the authority's adopted development plan, unless material considerations indicate otherwise. In this instance, the statutory development plan for this application site is provided in the Ceredigion Local Development Plan (2007 - 2022), adopted April 2013.
- 6.39 In terms of policy allocations, the site is classified as 'white land' within the defined Settlement Boundary of the Urban Service Centre of Cardigan. The following LDP policies are considered relevant in the context of the proposed development:

Policy reference	Relating to
<i>Strategic Policies</i>	
S01	Sustainable Growth
S02	Development in Urban Service Centres (USC)
<i>Land Use Policies</i>	
LU02	Requirements Regarding Residential Development

LU06	Housing Density
LU12	Employment Proposals on Non-Allocated Sites
LU13	Change of Use in Relation to Existing Employment Land or Buildings
LU17	Tourism Facilities/Attractions (non accommodation)
LU22	Community Provision
LU24	Provision of Open Space
LU32	Development and the Waste Hierarchy
<i>Development Management Policies</i>	
DM01	Managing the Impact of Development and Communities on the Welsh Language
DM03	Sustainable Travel
DM05	Sustainable Development and Planning Gain
DM06	High Quality Design and Placemaking
DM07	Conservation Area
DM09	Design and Movement
DM10	Design and Landscaping
DM11	Designing for Climate Change
DM12	Utility Infrastructure
DM13	Sustainable Drainage Systems
DM14	Nature Conservation and Ecological Connectivity
DM15	Local Biodiversity Conservation
DM17	General Landscape
DM18	Special Landscape Areas (SLAs)
DM19	Historic and Cultural Landscape
DM20	Protection of Trees, Hedgerows and Woodland

- 6.40 The most pertinent planning policies have been copied below;
- 6.41 Policy S01 Sustainable Growth
“Growth will be focused to deliver stronger, more sustainable communities and this will be achieved by providing opportunity for development as follows:
1. *Approximately 6544 dwellings in order to meet the projected growth of 6000 units (detailed Table 6.1). This will be achieved in a sustainable manner through the following distribution:*
 - a. *At least 51% in the Urban Service Centres in line with Policy S02 on allocated sites as set out in Appendix 2, the Settlement Group Statements and shown on the Proposals Map and on ‘windfall sites’;*
 - b. *24% in the Rural Service Centres on allocated sites as set out in Appendix 2, the Settlement Group Statements and shown on the Proposals Map in line with Policy S03; and*
 - c. *A maximum of 25% (or in any event no more than 1522 units) in the ‘Linked Settlements and Other Locations’ on non-allocated sites in line with Policy S04.13*
 2. *Employment opportunities to provide for 4000 jobs across the County in a sustainable manner in line with Policies S02, S03 and S04, either on:*
 - a. *The 39 hectares (net) allocated land (23 ha Aberystwyth Area and 16 ha in the Cardigan Area) as set out in the Settlement Group Statements and shown on the Proposals Map; or*
 - b. *Sites that have not been allocated in accordance with policies LU11-LU21.*
 3. *Other types of development on allocated sites as set out in the Settlement Group Statements and shown on the Proposals Map and also on sites that have not been allocated provided in accordance with Plan Policy.*
In delivering this growth, the County’s environment and resources are protected and enhanced”.
- 6.42 Urban Service Centres fulfil the role of both a local centre for the basic range of services for settlements within their Group as well as a role for providing higher level services meeting the needs which cannot realistically be met within the RSC Settlement Groups. Aberystwyth is the largest town in Ceredigion and fulfills a national as well as a regional role for mid Wales, as acknowledged in the Wales Spatial Plan. Besides Aberystwyth, Ceredigion has five other main towns identified in existing strategic plans, the Wales Spatial Plan and the

'Ceredigion Six Towns' designation of the Community Strategy. These are Aberaeron, **Cardigan**, Lampeter, Llandysul and Tregaron.

- 6.43 Policy S02: Development in Urban Service Centres (USCs)
*"Urban Service Centres provide sustainable locations where development will be permitted which: **in relation to Cardigan**, Lampeter, Llandysul, Aberaeron and Tregaron:*
a. Contributes to their overall sub-regional role as set out in the Settlement Group Statements; and
b. Contributes to their regeneration strategies, where these exist
- 6.44 Policy LU02: Requirements Regarding All Residential Developments
"Housing development will be required to provide:
1. all units to Lifetime Homes' standards so far as reasonably practicable; and
2. a mix of dwelling types and sizes to help secure a balanced housing stock, in that local area.
- 6.45 Policy LU12: Employment Proposals on Non-allocated Sites
"Proposals in relation to non-allocated sites will be permitted provided that:

1. the scale of B1, B2, B8 is in line with that envisaged under Policies S02-S04;
2. The density of the development is appropriate in relation to its location and proposed use; and
3. It is demonstrated that re-use of redundant or underused buildings within the area has been considered".
- 6.46 Policy LU22: Community Provision
"The LDP will help sustain and enhance community provision by:
1. Supporting the development of new sustainable community provision, provided that:
i. They are located within or adjoining a settlement;
ii. The planning application demonstrates that the feasibility of multi use has been considered;
iii. No suitable facility exists nearby which could appropriately accommodate the proposed use; and
iv. where the proposal is for a facility being relocated, it can be demonstrated that the existing site is no longer suitable for that use.

2. Resisting the loss or change of use of an existing community provision unless:
i. Alternative provision of at least equivalent local community value can be provided either within or adjoining the settlement or other settlements which are part of the Settlement Group. In relation to open

space specifically, the alternative should be an enhanced provision which is preferably located within close proximity to the existing provision.

ii. It can be demonstrated that existing level of community provision is inappropriate or surplus to the community needs of that settlement or Settlement Group; or

iii. The current use has ceased to be viable and no other community use can be viably established.

A report will need to be submitted with any planning application for the change of use or loss of facility explaining why the loss or change of use is justifiable”.

6.47 Policy DM01: Managing the Impacts of Development on Communities and the Welsh Language

“To enable the LPA to make an informed decision on whether proposed development is likely to have a negative impact on the social, linguistic or cultural cohesion of communities, a Community and Linguistic Impact Assessment will be required for applications:

1. Where it would result in new housing development:

a. in Linked Settlements coming forward at a rate greater than 4% of the dwelling count as of 1st April 2007 in any rolling 5 year period,

b. in Service Centres coming forward at a rate faster than that referred to in the Settlement Group Statement (if specified),

2. For all other types of development where the scale of development differs from that permitted under policies S03 and S04”

6.48 Policy DM06: High Quality Design and Placemaking

“Development should have full regard, and positively contribute to the context of its location and surroundings. Development should reflect a clear understanding of design principles, the local physical, social, economic and environmental context.

Development should:

1. Promote innovative design whilst having regard to local distinctiveness and cultural heritage in terms of form, design and material;

2. Complement the site and its surroundings in terms of layout, respecting views into and out of the site, producing a cohesive form in relation to the scale, height and proportion of existing built form;

3. Have reference, where appropriate, to existing layout patterns and densities including changes of levels and prominent skylines;

4. Retain important natural features along with ensuring the use of good quality hard and soft landscaping and embracing opportunities to enhance biodiversity and ecological connectivity;

5. Provide a safe environment by ensuring that the design of buildings and associated routes and open spaces consider safety principles;
6. Contribute to the creation of mixed and socially inclusive communities that provide for the health, education, recreation, community services and facilities, and social needs of all sections of the community;
7. Protect the amenity of occupiers of nearby properties from significant harm in relation to privacy, noise and outlook;
8. Encourage the re-use of materials wherever possible and ensure that new materials where used are sympathetic to the character of the locality;
9. Where practical, include infrastructure for modern telecommunications and information; and
10. Have regard to Settlement Group Statements, Supplementary Planning Guidance, Conservation Area Appraisals and any other relevant supporting documents”.

- 6.49 Policy DM19: Historic and Cultural Landscape
“Development affecting landscapes or buildings which are of historical or cultural importance and make an important contribution to the character and interest of the local area, will be permitted where the distinctive appearance, architectural integrity or their settings will not be significantly adversely affected. Where possible development should enhance these qualities and special character”.

Supplementary Planning Guidance

- 6.50 The following adopted supplementary planning guidance are considered relevant to the proposal:
- Community and the Welsh Language SPG (June 2015);
 - Ceredigion County Council Parking Standards SPG (January 2015);
 - Transport Assessment SPG (January 2015);
 - Built Environment and Design SPG (January 2015);
 - Nature Conservation SPG (January 2015); and
 - Open Space SPG (April 2014)

Appraisal

Overview

7.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- The **Principle of Development**
- The acceptability of the proposals in relation to **design and scale**
- Impact of the development on **Access and Highway Safety**
- Impact of the development on **Ecology**
- **Other materials considerations**

Principle of Development

7.2 The application site lies within the settlement boundary of the Urban Service Centre, Cardigan. It is unallocated, brownfield land and houses the vacant Former Cardigan Memorial Hospital buildings. The development includes the regeneration of a brownfield site to produce a mixed-use development including residential for the elderly, offices for WWHA and community provision. The delivery of this project will result in the loss of the existing hospital facility on site. The principle of each development aspect is discussed in turn below.

7.3 Turning firstly to the loss of the existing hospital site, this has been assessed against Policy LU22 which seeks to protect community facilities. The principle of losing the existing facility is fully justified on the basis that an 'Alternative provision of at least equivalent local community value' has been provided following the delivery of Cardigan Integrated Care Centre at Rhodfa'r Felin, Cardigan. Proposals seek to deliver a new community facility within the retained Nash house. This will include a new café and working space, which will be managed by a local social enterprise. Proposals therefore seek to retain a community facility on site which will allow the regenerated Nash House to be enjoyed by the people of Cardigan.

7.4 Turning to the delivery of new homes, Policy S01 'sustainable urban growth' confirms an aspiration for 51% of the 6544 dwellings to be built over the plan period to be delivered in the Urban Service Centres. Policy S02 states that Urban Service Centres provide sustainable locations where development is permitted within the defined settlement boundary where they contribute to the overall sub-regional role as set out in the Settlement Group Statements. The Settlement Group Statement confirms that Cardigan "*is expected to*

accommodate a relatively substantial proportion of Ceredigion's housing requirement" and acknowledges that the Town offers an *"opportunity for the development of windfall sites within the settlement boundary"*. Proposals for residential development accord with the provision of the Settlement Group Statement and satisfies LDP Policy S01 and S02.

- 7.5 Whilst this proposal exceeds the requirement for 20% affordable housing; Criterion 3 of the policy allows *"100% affordable housing sites where justified by evidence of unmet affordable local need provided the location of the development is in line with Policies S02, S03 and S04"*. The site was transferred to Wales & West Housing Association through the Welsh Government Land Transfer Protocol in conjunction with Ceredigion County Council. The Council therefore supported and committed to the redevelopment of the site for social housing and commercial use at acquisition stage. The proposed development of 100% affordable housing meets a real demand for this form of accommodation in this location.
- 7.6 Policy LU12 seeks to control the delivery of Employment Proposals on Non-allocated Sites. Policy LU12 is a criterion-based policy; each of these have been assessed in turn;

1. the scale of B1, B2, B8 is in line with that envisaged under Policies S02-S04;

Policy S02 'Development in Urban Service Centres' confirms that Cardigan should contribute to the overall sub-regional role as set out in the Settlement Group Statements. The Settlement Group Statement confirms that Cardigan is the second largest employment centre in Ceredigion. Cardigan is expected to provide for a minimum level of growth for the sake of the future economic well-being of the County. The proposed delivery of B1 office space for WWHA is without question inline with the relevant policy, S01.

2. The density of the development is appropriate in relation to its location and proposed use; and

The delivery of a new office space for WWHA seeks is appropriate in density terms and has been designed to assimilate into its historic context. The amount of office space has been informed by the pandemic and the changing working patterns within WWHA. The current design reflects what WWHA expect new working arrangements to be and now includes more meeting room space, 'booths' for video-conferencing calls and small areas of hotdesks. WWHA no longer expect significant numbers of staff to visit the office every day and the size of the building would now not allow this. WWHA expect the building to be used daily by a small core of

support staff and 10-20 other regular users that dip-in from time to time other the course of week.

3. It is demonstrated that re-use of redundant or underused buildings within the area has been considered.

Prior to purchasing the former hospital WWHA explored many potential sites and buildings in South Ceredigion, North Pembrokeshire and North West Carmarthenshire. WWHA drew up a shortlist and visited all the potential locations and none were as suitable as the hospital site. The Association wants a site that is prominent – this is the regional office for the whole Group of companies, a site that allows for the provision of a high-quality office environment and one that allows for all elements of the Group to be located in one place. WWHG has about 60 staff working in the west region for the housing association, about 30 for Cambria which is expanding quickly and about 20 for Castell Care and Support which will more than double over the coming 12 months. Originally, WWHA were looking for an office of about 1000-1200m² to accommodate most of the housing staff, a deport type building for the Cambria and sufficient hotdesks and meetings room for Castell and visiting staff from the other regions.

- 7.7 As mentioned, the Nash building is proposed to be retained and reworked to provide a community facility on site. The remainder of the hospital buildings, which are earlier editions are proposed to be demolished and this work has already commenced. Indeed, these later editions are considered to be unsympathetic and have an adverse impact on the heritage of the original late 18th century house.
- 7.8 The delivery of employment land on this site is considered to fully support the aspirations of Policy LU12.
- 7.9 Paragraph 2.2.4 of the LDP Settlement Statement for Cardigan outlines that the most significant area within Cardigan for redevelopment is the Cardigan Hospital. It is considered to be a 'gateway' location which will require to meet a high standard of design. As such the development of the site for mixed use development is considered to be a compatible form of development and appropriate for the site and location.
- 7.10 As a result, the principle of development is firmly established. The site is within walking distance of schools and shops and is in close proximity to public transport. The application site is conveniently located in a sustainable location. The proposed uses will deliver positive investment at this important gateway location. Prevailing development plan policy and material considerations support the

principle of bringing a vacant, under-utilised site back into beneficial use. The delivery of the site, subject to compliance with pertinent planning policies accords with the National Plan which identifies Cardigan as a Regional Growth Area; Paras 3.55 and 4.1.13 of PPW11 and Policies S01, S02, LU12 and LU22.

The acceptability in relation to design and scale

- 7.11 The proposals are considered to be visually acceptable in design terms, and would not result in a harmful impact on the character of the local area. The application site is well-related to the existing settlement pattern of the area. The proposed development comprises a mix of two and three storeys. This responds well to the established character of the surrounding area. Adjacent to the north of the site, along Pont y Cleifion Road, are residential properties of 2 and 3 storeys.
- 7.12 The vacant hospital sits within a generous plot. The accompanying layout demonstrates that the site can be developed for a mixed-use development, whilst successfully retaining a large area of outdoor space. The accompanying layout has been developed to retain the majority of the existing buffer and to provide a softer edge to the boundaries of the development with the majority of the trees and vegetation to the east retained. This will reduce the visual impact of the site on the surrounding area.
- 7.13 Furthermore, the proposed material palette is considered both contemporary and appropriate with reference to site surroundings. The scheme is inspired by the character of the town centre conservation area and its historic context. The materials chosen therefore are considered sympathetic to the character of the site. The proposals also include the re-use of existing materials wherever possible, in line with placemaking Policy DM06 of the LDP.
- 7.14 It is considered that the proposed development will contribute positively to the existing built environment and is of a size and form which does not compete with existing features of importance but will complement these successfully. The proposals therefore fully accord with PPW, TAN12, Well-being of Future Generations (Wales) Act and Policy DM06 of the LDP which seek to create high quality, distinct places which positively contribute to the context of its location and surroundings.

Access and Highway Safety

- 7.15 The application site is located within settlement limits and is unallocated within the Ceredigion Local Development Plan. The site is within walking distance of schools and shops and is in close proximity

to public transport. The site is therefore considered to be in a sustainable location and in line with Policy DM03 of the LDP.

- 7.16 When operational, the hospital had a significant number of staff, deliveries and patients visiting for appointments throughout the week. The proposed development will likely accommodate 30 staff plus 20 one-bedroom apartments. Parking will be provided for the proposed office space and spaces to support the residential accommodation. Any visitors attending the community provision within Nash House will arrive on foot. Therefore, the level of traffic that will be generated by the proposals is likely to be significantly less than the former hospital use.
- 7.17 The existing two points of access to the site from Pont y Cleifion will be removed, permanently stopped-up and replaced by a single point of access at the north of the site. This access will be 6m wide and has been designed to accommodate a refuse vehicle. It is considered that the proposed visibility splays of 2.4m x 43m will be acceptable, providing adequate stopping sight distance for drivers approaching at the 30mph speed limit.
- 7.18 As outlined within the accompanying Transport Assessment, car parking has been provided in accordance with the Council's SPG which states that the Parking Standard requirement for this development is for 28 spaces in total. This proposal includes 52 spaces, which goes above the minimum required, in turn complementing local policy.
- 7.19 It is therefore considered that the proposed development can be safely accommodated without impacting the local highway network and the scheme therefore complies with PPW, TAN18, Well-being of Future Generations (Wales) Act and LDP Policy DM03.

Ecology and Green Infrastructure

- 7.20 The submitted Preliminary Ecological Appraisal (PEA) confirms that the majority of the application site is improved and semi-improved amenity, grassland, missed shrub and scattered trees. which has negligible ecological value.
- 7.21 In addition, there are a number of trees identified on the site. Due to this, a Tree Survey supports this application. The Report concludes that the proposed development will have no detrimental impact on the existing trees at this site. The trees to be removed are three which are in poor condition; and one small semi-mature maple and a small group of young self-set ash, the removal of which will be required to construct the new car park. Where trees are being retained the layout has been developed to have due regard to the root protection areas

of the trees concerned. As such it is concluded that any potential impacts with regards to arboriculture are considered negligible and can be addressed through the implementation of construction protection measures.

- 7.22 In line with the recently amended Chapter 6 of PPW in its 11th Edition, the application is supported by a robust landscaping scheme prepared by rds landscaping. The updated chapter 6 places a greater focus on Green Infrastructure and it is considered that this submission shows due deference to the updated policy and demonstrates an ability for the site to address the nature emergency through the planning system.

Other materials considerations

Heritage and Archaeology

- 7.23 It is noted that the application site is located in close proximity to the Grade II* St Mary's Church and the conservation area to the west. The site also comprises the remains of a building that has been adapted over the years but was originally designed by the notable architect John Nash. The design of the proposals will require some demolition works which include the reduction of the church boundary wall which is Grade II* listed.
- 7.24 The demolition will help to facilitate a sympathetic layout which will have due regard to the setting of the Grade II* St Mary's Church, the conservation area as well as retaining and restoring the building by John Nash. As a result, the proposals are considered to comply with Policy DM19 (Historic and Cultural Landscape), which states that development will be permitted where it enhances the qualities and character of existing landscapes or buildings of historic or cultural importance.

Flood Risk and Drainage

- 7.25 The application site is identified both within flood Zone A to the north-west of the site and Flood Zone C2 on the remainder of the site to the south. The layout provided confirms that the proposed residential development will be confined to the area noted as being within Flood Zone A to the north west of the site with the remaining development being proposed where less vulnerable development is permitted.
- 7.26 The LDP Settlement Statement for Cardigan outlines that there is a presumption against developing on areas of high flood risk. However, development can be justified if it is part of a regeneration initiative, it is on previously developed land and the potential consequences of a flooding event for the particular type of development have been considered.

7.27 It is clear that the proposal forms a wide regeneration initiative in the gateway location of Cardigan and is placed on previously developed land, supporting the above criteria. The potential consequences of a flooding event for the proposed development have also been considered within the supporting Flood Consequence Assessment. The FCA confirms that the proposed development satisfies the Justification Test requirements, including managing flood risk in line with the acceptability criteria. It is therefore considered that the development meets the principles and requirements set out in TAN-15, the aims of Planning Policy Wales and within the LDP Settlement Strategy.

Conclusion

- 8.1 This Planning Statement has been prepared on behalf of Wales and West Housing Association to accompany a planning application for the construction of a mixed-use development which includes office workspace, café, residential development, storage building and associated works at land at the former Cardigan Memorial Hospital, Pontycleifion, Cardigan, SA43 1DP.
- 8.2 The application site is brownfield, located within settlement limits of the LDP and is not designated for a particular use. The LDP Settlement Statement for Cardigan outlines that the most significant area within Cardigan for redevelopment is the Cardigan Hospital. It is considered to be a 'gateway' location which will require to meet a high standard of design. As such the development of the site for mixed use development is considered to be a compatible form of development and appropriate for the site and location.
- 8.3 The proposed development has been designed to recognise the location of the site and through appropriate layout and sensitive mitigation is considered to be in accordance with planning policy.
- 8.4 In light of the above, it is concluded that the proposal fully accords with both national and local policies and there are no material considerations which should prevent the planning application from being determined in accordance with the relevant planning policy framework. In this respect, it is respectfully requested that the Ceredigion County Council consider this application favourably and grant outline planning permission for the proposal.