

Local Residents of Talgarth

Former Mid Wales Hospital Site, Talgarth

**Independent Transport and Highways
Review**

July 2013

Redevelopment of the Former Talgarth Hospital Site

Introduction

1. Vectos are retained by the local residents of Talgarth to prepare an independent review of the highways and transport issues pertaining to the redevelopment of the former Mid Wales Hospital.
2. This note is intended to provide the LDP Inspector with clear and concise reasoning as to why the former Talgarth Hospital Site should not be allocated for mixed use development as currently proposed within the LDP.
3. It seeks to point out the fundamental and contradictory inaccuracies made by the BBNPA and Powys highway officers in concluding that this site is appropriate for the scale of residential-led mixed development proposed and demonstrates that any allocation would be contrary to local and national policy relating to accessibility, sustainability and connectivity unless significant improvements to the local highway network are provided.

History

4. The Hospital was formerly used for mental health patients and at the later stages it added other NHS purposes e.g. laundry, school of nursing and midwifery. The Hospital has been closed since 2000. There were some changes in use from 2001-2003 but nothing to affect the main brownfield area of the site. Many of these changes of use were not instigated and the S106 agreements, including traffic constraint and park and ride schemes, remain unsigned.
5. Since then the longstanding situation has been that most of the buildings have been left unoccupied and unused and the site is totally deserted and barricaded to keep people out.
6. The hospital ceased operating in the late 1990's and since then had been used as the Black Mountains Business Park but this ceased some years ago.
7. More recently, the refused redevelopment proposal (October 2012. 12/07922/FUL) includes:
 - 85 private residential dwellings;
 - 70 bed residential care home;
 - 18 residential retirement dwellings;
 - Conversion of chapel into multi use community hall (D2);
 - Conversion of mortuary into office (B1); and
 - Demolition of existing former ward buildings.

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8. The associated transport and highways proposals are included with the WSP Transport Assessment (TA) February 2012 in support of the Collins Developments proposals for the site.
9. This TA formed part of a planning application (12/07922/FUL) in October 2102 made to the Brecon Beacons National Park (BBNPA).
10. In her letters of 21st May 2013 and 20th August 2012 (**Appendix A**), Alison Brown of Powys Highways recommends refusal of this application in the interests of highway safety. The main reasons given to resist the application were:
 - Shortfall in parking provision across the site;
 - Unrealistic representation of possible traffic generation from the site and inappropriate use of traffic data which is 18 years old;
 - No consideration for pedestrians especially with respect to the local topography; and
 - Distance and topography will have a negative impact on public transport for residents within the site.
11. This application was subsequently refused by BBNPA on 2nd May 2013.
12. The site was also submitted as a Candidate site but failed at the Third Stage Assessment.
13. Despite the BBNPA refusal for development on this site, the Inspector's preliminary findings on Housing and Employment land provision within the LDP process concluded that redevelopment of this site could make a significant contribution to the shortage (200) in supply of housing towards the end of the Plan (2007-2022) period and that the site should be considered for mixed use development.
14. Contrary to previous consideration in relation to development on this site, BBNPA officers stated on the 11th June 2013 that the site should be allocated for mixed use development comprising:
 - 75 houses and 18 retirement apartments; and
 - 3500m² of B1 and or medical D2 uses.
 - Conversion of chapel to community use
 - The reinstatement of cricket pitch and tennis courts for community use
 - The provision of new landscaping and areas of public open space
15. This judgement was made despite highways officers previous concerns regarding the scale of development on this site and without any evidence to the contrary. In addition, the scale of the development proposed within the LDP is broadly the same as the planning application refused by BBNPA with 10% less residential, no 70 bed care home but with over 3500m² of additional B1 and D2 land use.
16. However there would appear to be a misunderstanding in respect of the highways officer (Alison Brown's) opinion relating to the maximum permissible levels of development on this site. This

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states that based on an average number of 8 movements per dwelling that 85-90 units would be the maximum allowable if the same came forward as entirely residential (**Appendix B**).

Critically, the following paragraph seems to have been overlooked by BBNPA officers whereby she states that 'any alternative uses would need to be assessed for the traffic generation and figures adjusted accordingly'.

17. The site is therefore not considered acceptable in highway safety and functional terms by the highway authority as a mixed use development as promoted within the LDP.
18. The remainder of this Technical Note seeks to demonstrate why this site should not be given any further consideration for the level of mixed use development proposed and is structured as follows:
 - Traffic Generation
 - Sustainability
 - Safe routes to School
 - General Highway Safety
 - Construction Traffic

Traffic Generation

19. The case for an appropriate level of traffic generation for this site is predicated on the brownfield status of this site i.e. the former hospital use. However, the relevant lawful use is not the significant traffic generating institutional use.
20. It is evident from the BBNPA Director of Planning Chris Morgan's letter (**Appendix C**) of 14th June 2013 "that the planning authority considers that the extent of works necessary to reuse the buildings on the site is likely to be tantamount to development and appropriate planning permissions would need to be sought". Hence, whilst there is an historic brownfield use on this site, it has no current relevant lawful use.
21. This is fundamental to all previous correspondence and calculations relating to forecast traffic generation from this site and is a serious oversight by the highways officer in relation to determining what level of traffic is appropriate to attribute to the former use on the site.
22. Within the October 2012 Collins Development planning application there is an abundance of communication between the applicant's transport consultant and the highway officer Alison Brown.
23. The thrust of this relates to the former brownfield use, which should be given no weight, but nevertheless points the applicant to traffic data which was recorded when the site was operational some 18-19 years ago.
24. Within this communication a suggested daily flow from the site is assumed to be 755 i.e. 686 recorded peak daily movements on Hospital Road in 1994 factored by 10% to account for movements on Church St. This figure of 755 daily movements has been suggested as

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appropriate for use despite more recent average weekly data contained within the 1997 planning brief for the site as 562 daily movements.

25. The WSP report has sought to use the brownfield peak daily trips from the former hospital use of the site to calculate a reduction in traffic generation from the proposed development. They have interrogated the TRICS database to establish trip rates for the various hospital departments and netting off their calculated traffic generation from the proposed development traffic volumes. Likely peak hour traffic generations have been derived from the peak daily traffic observed at the site in 1994.
26. Importantly, the former Mid Wales Hospital was a residential institution and was highly unlikely to generate those trips during the typical highway peak periods. The number of visitors was likely to be low and staff would have worked shifts and their travel would not have coincided with the local highway peak periods. A residential development would generate a substantial proportion of daily traffic generation during the peak periods travelling in the opposite direction to employment uses, greatly increasing the volume of vehicles on the local highway network at the busiest times. The consequence of this is a greater probability that vehicles travelling in opposite directions may meet each other along the narrow access routes and therefore a higher risk of conflict. Therefore the proposed development would be detrimental to local highway safety.
27. The WSP report suggests that their TRICS interrogation revealed 18 sites comparable sites to the former hospital use on the site, however they chose one site which they believed to be the most relevant, a Neurological Centre in the London Borough of Wandsworth. This site is not relevant to the former Mid-Wales Special Hospital for a number of reasons including;
 - The central London location is not reflective of the rural Mid-Wales location of Talgarth;
 - Talgarth would not have the same travel patterns / modal split as central London;
 - The Neurological Centre would have a high number of visitors and out-patients which is not typical of a residential mental institution.
28. The result of this approach within the WSP assessment is that the predicted traffic generation of the proposed development is less than the former use. This is wrong for the following reasons;
 - The Director of Planning from the BBNPA has confirmed that the brownfield use status of this site is not valid and hence applying a former brownfield trip generation from the site is not correct;
 - As the former hospital was a special mental hospital there would have been few visitors, particularly during the highway peak hours. In addition, staff shift change overs would not have occurred during the AM and PM peak highway periods. The recorded shift patterns were 0800-2000hrs, 0800-1400hrs and 1400-2200hrs. Therefore even if one was to consider that the brownfield use for this site was the former hospital, it is likely that the

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trips are an over-estimation and that the TRICS site chosen to calculate the proportion of peak hour trips is not a true representation and should be not be considered as representative; and

- The proposed residential development will generate a significantly higher volume of trips (with different direction of flow compared to hospital / employment use) during the highway peaks than the former land use and this will increase traffic volumes on the local highway network, and junctions within Talgarth to the detriment of highway safety.
- It must be remembered that both access roads from the hospital site lead and converge onto the town square

29. Notwithstanding the use of unsubstantiated traffic data, the scale of development proposed on this site as a result of a reliance of the former traffic generation dating back some 18-19 years is wholly inappropriate and should be based on site specific factors, the local highway network including junctions, physical constraints and the character of the town centre of Talgarth.
30. This is a serious omission in the contextual analysis made within the LDP about the suitability of this site for redevelopment.

Sustainability

31. The thrust of current local, regional and national policy on transport planning is to ensure that development is accessible, well connected and within reasonable walking and cycling distance to a number of key facilities and amenities. It places significant emphasis on the movement hierarchy with pedestrians and cyclists at the top followed by public transport and then car users to ensure that development is safer, provides social inclusion and is sustainable.
32. This is not a sustainable site for the quantum of residential development proposed.
33. In paragraph 68 of the Inspector's Preliminary findings on Housing and Employment Land provision April 2013 (**Appendix D**), a conclusion is made that the site is "within walking and cycling distance of the town (approximately 1 km) and there are regular public bus services linking the site to Hereford and other town centres".
34. This statement is strongly contended as it would appear that the local conditions for walking and cycling have not been considered and there are no bus services to the site.
35. Talgarth has one pair of bus stops that are located on Talgarth Square which the WSP TA indicates as being approximately 850-900m from the site. Whilst the measuring start point has not been indicated, we believe it has been measured from the site access and is not representative of the actual walking distance of future residents. It appears that the development proposals allow for a pedestrian access between the Hospital Villas on Hospital Road and we have measured the distance to the units as shown on the development Masterplan. It is approximately 110 m further than WSP indicated to nearest residential

property and an additional 400 m to the furthest property in the site. Therefore the actual walking distances to the Talgarth Square bus stops are:

- Nearest property – 960 m (nearest bus stop) and 1,010 m (furthest bus stop);
- Furthest property – 1,250 m (nearest bus stop) and 1,300 m (furthest bus stop).

36. The shopping facilities / local amenities located on High Street are a similar distance from the residential properties as the bus stops indicated above. In addition the Doctor's surgery located on the either side of town and to the west of the A4078 is some 1.5km – 2km away from the site. Moreover, the recreational fields are also located in the opposite side of town.
37. Whilst these distances are considered to be within a reasonable walking distance for able-bodied people, the walking route between the site and the key local facilities in Talgarth is particularly poor and the topography of the local area is not conducive for walking and cycling.
38. This topography of Hospital Road, averages a 5 % gradient over circa 900m and will make the route unappealing for small children to scoot or cycle. Noting that this is an average (quoted within the WSP TA) and certain sections are significantly steeper in gradient.
39. The WSP TA conveniently does not provide a detailed review of local pedestrian infrastructure. A Pedestrian Environment Review System (PERS) Audit or a Non-Motorised User (NMU) Audit has not been undertaken. A PERS/NMU audit would review the primary walking routes between the site and key local facilities and we believe would identify numerous issues with the existing pedestrian environment which would require mitigation measures in order to make the routes safe and convenient for future residents of the development. No specific mitigation measures to improve accessibility and connectivity are proposed.
40. We have carefully reviewed the walking route along Hospital Road, Penpont Road and Bell Street and have concluded:
 - The existing sections of footway do not appear to be of sufficient width to accommodate pedestrians passing each other, especially if they have small children or pushchairs i.e. 1.8-2m ;
 - There are a number of sections along the route with no footway and pedestrians would be required to walk in the road. Whilst this is not uncommon for Welsh rural villages, there are a number of blind spots, narrowing's and physical restrictions (e.g. bridges and parked cars) to negotiate which creates an unpleasant and dangerous walking environment. No improvements or crossings have been proposed at key pedestrian desire lines
41. We believe that inappropriate weight has been given to the specific nature of the site and the existing walking, cycling and public transport infrastructure and hence the propensity for future residents to use these modes of travel will be significantly reduced. All of this is contrary to local and national policies contained within TAN 18 and the UDP relating to accessibility, major travel

generating uses and accessible housing development. At paragraphs 3.2-3.4 of TAN 18 it states that:

- Accessibility is the relative ability to take up services, markets or facilities. Focussing on accessibility is important in addressing social exclusion and for maximising choice in services, employment and recreation opportunities remembering in most cases that transport is a means to an end.
- The location of new residential development has a significant influence on travel patterns as the majority of trips start and finish at home
- It should be the key aim of development plans 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.
- Settlement policies and residential allocations in development plans:
 - Promote housing development at locations with good access by walking and cycling to primary and secondary schools and public transport stops
 - Require layouts and densities which maximise the opportunity for local residents to walk and cycle to local facilities and public transport stops.

42. As per the recent refusal, the following policies from the UDP are relevant:

- Policy G3 – the proposed development is compatible with the National Park road hierarchy in that it is within the capacity of existing approach roads and does not have an unacceptable impact on traffic circulation or highway safety
- Policy ES38 states - the proposal allows for public space provision and incorporates safe and convenient linkages and routes for pedestrians and cyclists to promote the use of forms of transport other than the car
- Policy ED39 states that Problems caused by traffic dominating towns and villages are frequently raised by members of the public, with support voiced for effective traffic management. Traffic management comprises measures to improve road safety and the environment, including traffic calming, which helps to reduce vehicle speeds and improve driver behaviour.

43. The aspirations and criteria set out within these policies are intended to be duplicated within new policies within the LDP.

44. Hence the proposed residential –led mixed use development is contrary to local and national policy which promotes accessibility and sustainability in new developments.

Safer Routes to School

45. Nationally, there is an increase in the number of children cycling and scooting to school.
46. The site is located approximately 1.2 km from Talgarth Primary School and future residents / pupils would be required to walk via Hospital Road, High Street, Hay Road and Back Lane. As per Hospital Road, these streets also lack any pedestrian crossings and include extended sections of sub-standard width footways and sections of no footways.
47. Moreover, the preferred site within the emerging LDP for the new school (to the west of the A4078 and adjacent to the Doctor's surgery) is a very significant distance away from the site.
48. The sections of the route between the site and the school, where footways are present, are not wide enough to accommodate a parent walking hand in hand with a small child and as such, is not considered appropriate as a walking route to the local school.
49. The width of Hospital Road varies, however it is generally considered to be a narrow rural road with a number of pinch points and narrowings. Narrow highways provide a particularly unpleasant environment for cyclists as vehicles overtake. The narrowing features and parked vehicles along the route between the site and the primary school make the route particularly unsuitable for children to cycle. Additionally the topography of Hospital Road makes the route unappealing for small children to scoot or cycle.
50. The alternative route via Church Street is even more tortuous and inappropriate for pedestrian activity. It is single file lane with little or no scope to create passing bays. It is totally constrained by a ravine and houses on one side and retaining walls of steep banks on privately owned land. The route is also in a conservation area so it is not possible to construct a footway. In addition to this if there is traffic congestion on Hospital road then it is likely that traffic will reassign to Church Street to gain access to the school, Hay on Wye and other destinations.
51. In addition Bell Street is accepted locally as also being one of the key pinch points within the local highway network. This is an important and physically constrained street which forms a prominent element of the conservation area.
52. The existing street network and topography is not a safe environment to promote walking or cycling to school and would inevitably result in a high proportion of car-borne journeys to local amenities of between 1-2 km which is contrary to best practice and local and national policy relating to transport and movement and the location of new development.

General Highway Safety

53. The accident analysis contained in Section 2 of the WSP Transport Assessment suggests that as there were only eight recorded accidents during the five year survey period and that there were

no clusters of accidents, that there are no deficiencies in the road design and hence no mitigation measures are required.

54. Whilst this may be an accurate judgement of baseline data, no further consideration has been given to the impact of additional development traffic on the narrow rural highways, particularly in relation to the poor pedestrian provision.
55. There are two existing access points, one on Hospital Road and one on Church Street, which is a rural lane. Church Street is very narrow along its entire length with few areas of widening to allow two vehicles to pass safely. The volume of vegetation along the sides and undulating nature of the highway means that there would be a high risk of conflict between vehicles. This makes this route highly unsuitable as a means of access to a residential development.
56. Hospital Road is generally wide enough to allow two cars to pass each other but larger vehicles would be more problematic, refuse vehicles for example.
57. Additionally, as already mentioned there are severe narrowing's along Hospital Road and if the proposed development were to go ahead, there could be an increase in the number of pedestrians in the highway, which due to the poor forward visibility and parked vehicles etc., would make it difficult for drivers to see them. The new bridge on Hospital Road creates blind spots. Pedestrians, especially small children cannot be seen by approaching vehicles from either side of the bridge
58. Whilst the proposed development addresses some of these issues in the Movement and Access section of the Environmental Statement (ES), no mitigation measures are recommended, indeed the very features that are most dangerous to pedestrians are referred to as natural traffic calming features and conducive to a pleasant pedestrian and cycling environment.
59. Whilst the idea of pedestrians and vehicles sharing road space is acceptable in some situations, the poor forward visibility and lack of space for pedestrians would mean that vehicles and pedestrians would not mix safely in this case, particularly on the access routes on Hospital Road where there are sections without any footway and none at all on Church Street
60. As previously mentioned, no weight is given to the local topography and gradients along Hospital Road which is not conducive to promoting travel by foot or bicycle.
61. Moreover the consequential effects of traffic intensification have been underestimated at Talgarth Square.

Construction Traffic

62. The construction period of the proposed development is likely to be around seven years if the construction prediction of 12 dwellings per annum is accurate (as contained within the ES).
63. Whilst the ES only forecasts approximately 1 HGV movement per peak hour, this is based on a pro-rata decrease from an extremely large development site in Camborne which comprises some 3,500 residential dwellings, large business park, supermarket, hotel and a variety of administrative, commercial and retail premises.

64. Any comparisons between the construction requirements of the proposed development and this large mixed-use development are unreasonable as they will have completely different requirements.
65. The proposed development is likely to generate more than one HGV movement per peak hour as materials are needed at the site.
66. In any event, Hospital Road is not considered suitable for the daily transportation of construction materials, particularly as the construction program could stretch to 8-10 years. This would be detrimental to the operational performance and safety of the local highway network particularly at key pinch points and engineering constraints within the network.
67. Furthermore, as the houses are built and residents move in, there will be an increased number of pedestrians walking along Hospital Road and the continued presence of large HGVs would be further detrimental to pedestrian safety and would increase community severance (fear and intimidation, noise and vibration) in Talgarth.

Summary and Conclusions

Summary

68. This note has sought to demonstrate that the scale of development mooted within the LDP is inconsistent and inappropriate given the locale and site specific characteristics of this site.
69. Fundamentally the redevelopment of the site in this context will not promote accessibility and connectivity and will not be sustainable contrary to local and national policies which promote accessibility and connectivity by non car modes.
70. The information contained within this note has demonstrated that;
 - The fundamental data and assumptions made by the highway officer in relation to the former use on the site are inappropriate and misleading consequently leading to a scale of development and traffic generation which is unsustainable in highway effect terms to the detriment of highway safety;
 - Consequently the effect of additional traffic within the village has been underestimated;
 - The site is remote from the village of Talgarth and the local topography is not conducive to encouraging the propensity for trips to be made by foot, cycling or public transport – hence the development will be over reliant on car borne modes of transport;
 - The existing pedestrian and cyclist network is poor given the constrained, rural nature of the site and no mitigation measures have been proposed;
 - Routes to school are not safe or sustainable; and
 - The effect of construction traffic has been overlooked.

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Conclusion

71. Based upon the information contained within the foregoing we believe that the planning officers within BBNPA have been informed by the local highway officer into believing that this is a sustainable and appropriate site for development.
72. Clearly this is not the case and without significant investment in improvements to the local network of walking and cycling routes we would recommend that the Inspector dismisses the site for mixed use residential-led development of this nature.
73. As such the site is contrary to local, regional and national planning policy and should not be delivered with development of this magnitude.

APPENDIX A

Steve Holdaway, B.Sc., D.M.S., C.Eng., M.I.C.E., M.C.M.I
Pennaeth Gwasanaethau Lleol ac Amgylcheddol
Head of Local & Environmental Services

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Brecon Beacons National Park Authority
Plas y Ffynnon
Cambrian Way
Brecon

F.A.O Mr Rhodri Davies

Dear Rhodri

Os yn galw gofynnwch am/If calling please ask for:

Enw/Name: Miss Alison Brown

Ffôn/Tel: 0845 607 6060

Ffacs/Fax: 01874-611277

Ebost/Email: tlshelpdesk@powys.gov.uk

Eich cyf/Your Ref: 12/07922/FUL

Ein cyf/Our Ref: LES.B/ 12/07922

Dyddiad/Date: 21st May 2012

RE: Former Mid Wales Hospital, Talgarth

Whilst redevelopment of this site has never been in question, in principle, the information provided within the submitted drawings leaves many highways questions unanswered and the level of traffic likely to be generated is very close to the previous levels of its days as a hospital.

The scale of the development will require an adoptable estate road network and layout details of the roads, private drives, courtyards, parking and all anticipated adoptable areas do need to be provided at this stage to allow us to make useful comment. Cross sections, radii, swept paths, service routes, refuse collection arrangements, turning heads etc. are all features which need to be detailed. The junctions at either end of the current through road and the road itself will require adoption and full drawings of this route are required for consideration. It will undoubtedly be necessary to establish the existing construction of the through road to ensure suitability for adoption by Powys.

Drainage, particularly of the adoptable areas, is another very important feature which requires full clarification and has yet to be addressed.

The T.A. is obviously written to support the application but considerable emphasis has been placed on referring to the parking standards as 'maximum permissible'. This is not the wording used in the guidance. The relatively remote location and the topography around the site are far from conducive to non-motorised traffic and adequate parking facilities will be important. The following paragraphs are further observations relating to the application documents received.

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FM 23380

I consider it to be misleading to suggest that the 45m height difference between Talgarth Square and the site is spread over the 900m distance. The hill itself covers little more than 600m when approaching via Hospital Road and goes up and down at least once before making the rise to the site via Church Street. I believe this height difference and the lack of continuous footway should also influence the paragraphs written regarding *“walking offers the greatest opportunity to replace the car as a mode of transport for short journeys”*

The level of parking shown on the plan leaves a significant number of spaces unaccounted for and the proposal of on-highway parking is not supported by highway layout details that show that such parking will not result in serious congestion within the site. The larger buildings do not appear to have any localised parking facilities at all but the cricket pitch and tennis court on the plan have ample parking although the T.A. does not refer to any allowance being made for these facilities within the calculations.

The bus services available to the locality are far more limited than is suggested by the T.A. The phrase *“the services are suitable for.....supporting the daily commute to work of staff working reasonably standard hours”* actually refers to just one bus per day in each direction for someone working in Brecon. The reference to a route providing connection to frequent rail services to/from Abergavenny is, in reality, just once a week.

Paragraph 4.6.1 states *“there are good established vehicular access arrangements to the site via Hospital Road”* but by para. 4.6.5 the issue of on-street parking is highlighted along with the suggestion of parking restrictions. Such a measure will clearly antagonise the local residents and move the problem elsewhere as dwellings without off-street parking seek the nearest un-restricted parking area.

The accident data referred to in Chapter 2 in the T.A. is naturally covering the last five years but the trip figures for the site provided by the Highways Authority date back around eighteen years and are not therefore comparable. It should also be noted that the trip figures were provided at the outset as the maximum acceptable over which significant additional measures would be required to ensure that alternative modes were not just on offer but were used. Although a Travel Plan has been outlined and a clear action plan stated, the implementation will be largely down to future residents/employers and there are no suggested penalties if this fails.

In conclusion I am concerned at the scale of the development proposed and also that the supporting T.A shows potential trip rates for the scheme so close to the agreed maximum. It is accepted that the site has very limited scope for improvements to the access routes and was previously a thriving and self-sufficient mental hospital but I would have expected to see greater restraint in new traffic generation given the passage of years since this closed and the actual current level of traffic movement.



FS 28347

Cont....

I trust that if the scheme is proceed the additional information requested above will be forthcoming.

Yours sincerely,

For Local and Environmental Services

Footnote:

Interestingly the agent has just telephoned and informed me of his client's aspiration to have the entire site covered by a management company in relation to maintenance but for the purpose of commenting accurately on this application I must seek the details requested above.



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Os yn galw gofynnwch am / If calling please ask for:

Enw / Name: Miss Alison Brown

Ffôn / Tel : 0845 607 6060

Ffacs / Fax : 01874 611277

Llythyru electronig / Email : tlshelpdesk@powys.gov.uk

Eich cyf / Your Ref :

Ein cyf / Our Ref : L&ES/APB/RPE/PL.01/12/07922

Dyddiad / Date: 20th August 2012

For the attention of Mr. Rhodri Davies

Dear Rhodri,

Former Mid Wales Hospital, Talgarth

I refer to the revised plans received from WSP and Barton Willmore and must advise that I remain opposed to the development as proposed.

Overall I would observe that many of the drawings submitted are conceptual and of inappropriate scales to display the information required. In some cases the scale has had to be guessed.

- Whilst the CSS Parking Standards may state that “minimum parking standards are no longer appropriate” the assumption that this indicates the figures are “the maximum permissible” goes too far. The standards are recommended levels with scope to consider compromise if the convenience of local facilities, public transport is tangible. I do not consider that the parking facilities shown are anywhere near an acceptable level, especially as some spaces are unusable due to lack of manoeuvring space and others fall within the suggested adoptable area. Such space could not be designated to individual properties and would be open to public parking.
- The preliminary highway dimensions drawing is so far removed from what this Authority would consider an adoptable layout that it is difficult to envisage basic common ground upon which to begin discussions. The entire layout relies on endless blind and dangerous reversing manoeuvres and doesn't show even Manual for Streets levels of visibility. No account is made for pedestrian movements or disabled users.

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- The swept path drawings are of inappropriate scales to realistically consider the implications. The refuse lorry size is not specified and the direction of travel unclear. The drawing suggests extremely limited space remaining, if any, if all parking spaces were occupied and no passing opportunities with other traffic. Furthermore, Powys recycling policy requires multiple boxes to be left out for collection. I do not believe the spaces shown for communal bin assembly points reflect the scale of this operation.

The fire appliance also appears to be very tight and certainly seems to have no working space should they have to stop. I think further consultation with the Fire Service will be appropriate.

I find the need to provide swept path drawings for private cars in the context of a residential development extremely worrying. A number of the diagram elements suggest multiple manoeuvres to achieve parking within a courtyard and not every space within that area is shown to be accessed.

- The indicative adoption plan is also to a scale which makes details unclear.

There are no realistic turning spaces for certain areas likely to be used by the public and reversing is likely to be excessive.

The main road through the site has been shown as too narrow for vehicles to pass and the junctions at either end, which link to the existing network, are still not detailed.

- My letter of 21st May states “...I am concerned at the scale of the development proposed and also that the supporting T.A. shows potential trip rates for the scheme so close to the agreed maximum”. I do not consider this represents satisfaction of the possible level of traffic generation for the scheme.
- No obvious consideration has been shown for pedestrians within the site layout. Furthermore whilst the geographical region does have a hilly topography, the residential areas in Talgarth are currently on or near level with the town’s facilities.

This is not the case for this site and therefore the continued belief that pedestrian trips to the site are not disadvantaged by the topography has serious shortcomings.

- The distance and topography between the site and the public transport facilities remains an issue likely to have a negative impact on the uptake by residents of this site.

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- In view of the total discrepancy between the timing of the accident records of the last five years and the traffic data of eighteen years ago I believe the conclusion made under TAR-Road Safety is inappropriate and unrealistic given the significant increase in traffic from the current levels this development will generate.

For the reasons detailed above I continue to recommend refusal of this application in the interests of highway safety.

Yours sincerely,

Alison Brown
For Local and Environmental Services

APPENDIX B

Vickie Page

From: Ryan Greaney
Sent: 24 June 2013 15:10
To: Vickie Page
Cc: Tracy Nettleton; Christopher Morgan; Rhodri Davies; Rhiannon Edwards
Subject: FOI/020/2013 - Freedom of Information Request
Attachments: RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site; RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site; FW: BBNPA LDP EXAMINATION - Mid Wales Hospital Site; FW: BBNPA LDP EXAMINATION - Mid Wales Hospital Site; RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site; RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

Hi Vicky

Email correspondence had with Alison Brown (PCC Highways) regarding Mid Wales Hospital attached.

Regards
Ryan

Ryan Greaney BSc MSc MRTPI
Principal Planning Officer

Brecon Beacons National Park Authority - Awdurdod Parc Cenedlaethol Bannau Brecheiniog
Plas Y Ffynnon
Cambrian Way - Ffordd Cambrian
Brecon - Aberhonddu
LD3 7HP
Telephone - Ffon: 01874 620 431

Vickie Page

From: Ryan Greaney
Sent: 24 April 2013 14:19
To: alison.brown@powys.gov.uk
Cc: LDP; Tracy Nettleton
Subject: RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

Hi Alison

Having discussed your response with the rest of the team, it would be very helpful if you could give us a without prejudice/'ball park' assessment in relation to the B1/D2 elements. I appreciate that it may be difficult to do so given the limited nature of the detail submitted to date.

What I'm keen to avoid is a situation where an allocation is made in the LDP that results in an application being submitted in good faith which will find it difficult to achieve the Highways requirements set by your department. Your comments will be very helpful in determining an appropriate level of development for this site.

I look forward to hearing from you.

Regards
Ryan

From: Alison Brown (CSP - Transportation & Development Enablement) [<mailto:alison.brown@powys.gov.uk>]
Sent: 23 April 2013 17:02
To: Ryan Greaney
Subject: RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

Dear Ryan,

I am sorry for not getting back to you before.

The scale of development you detail in your email is, or at least would appear to be, a reduction from the submission last dealt with on the site in so much as there are no longer any live/work units but the reference to B1/D2 use is now in a format (square metres) which doesn't relate easily to the bed numbers previously discussed.

Previously I stated "*I am concerned at the scale of the development proposed and also that the supporting T.A shows potential trip rates for the scheme so close to the agreed maximum*". If the current discussions are based on a reduction overall from the previously submitted scale then I would suggest that the potential trip generation will also be reduced and I am therefore likely to be, in principle, supportive of such a scheme. Until there are specific figures to study it is difficult to commit to a yes or no answer to your query.

I hope this is sufficient for you to progress.

Regards,
Alison

Alison Brown
Rheolwr Ardal dros Reoli Datblygu (Sir Frycheiniog)
Area Highways Development Control Officer (Brec)
Local and Environmental Services
Cyngor Sir Powys/Powys County Council
Ffon/Tel:0845 607 6060
Ffacs/Fax:01874 611277

Vickie Page

From: Ryan Greaney
Sent: 23 April 2013 16:22
To: alison.brown@powys.gov.uk
Cc: LDP; Tracy Nettleton; Christopher Morgan
Subject: FW: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

Hi Alison

I would appreciate a response to my emails copied below.

I look forward to hearing from you.

Regards

Ryan

Ryan Greaney BSc MSc MRTPI

Principal Planning Officer

Brecon Beacons National Park Authority - Awdurdod Parc Cenedlaethol Bannau Brecheiniog

Plas Y Ffynnon

Cambrian Way - Ffordd Cambrian

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LD3 7HP

Telephone - Ffon: 01874 620 431

From: Ryan Greaney
Sent: 16 April 2013 16:44
To: Alison Brown (alison.brown@powys.gov.uk)
Cc: LDP; Tracy Nettleton; Christopher Morgan
Subject: FW: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

Hi Alison

I refer to my email copied below.

For your information, we are required to present our written recommendations to a Member Working Group (which takes no decisions) early next week. Accordingly, it would be a great help if you could provide me with a response by Friday.

I look forward to hearing from you.

Regards

Ryan

Ryan Greaney BSc MSc MRTPI

Principal Planning Officer

Brecon Beacons National Park Authority - Awdurdod Parc Cenedlaethol Bannau Brecheiniog

Plas Y Ffynnon

Cambrian Way - Ffordd Cambrian

Brecon - Aberhonddu

LD3 7HP

Telephone - Ffon: 01874 620 431

From: Ryan Greaney
Sent: 12 April 2013 14:51
To: alison.brown@powys.gov.uk
Cc: LDP; Tracy Nettleton
Subject: RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

Hi Alison

Vickie Page

From: Ryan Greaney
Sent: 16 April 2013 16:44
To: alison.brown@powys.gov.uk
Cc: LDP; Tracy Nettleton; Christopher Morgan
Subject: FW: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

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Ryan

Ryan Greaney BSc MSc MRTPI

Principal Planning Officer

Brecon Beacons National Park Authority - Awdurdod Parc Cenedlaethol Bannau Brecheiniog

Plas Y Ffynnon

Cambrian Way - Ffordd Cambrian

Brecon - Aberhonddu

LD3 7HP

Telephone - Ffon: 01874 620 431

From: Ryan Greaney
Sent: 12 April 2013 14:51
To: alison.brown@powys.gov.uk
Cc: LDP; Tracy Nettleton
Subject: RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

Hi Alison

Thank you for getting back to me so quickly. Your comments regarding this being "a numbers exercise" are noted.

The session paper submitted by the agent (Barton Willmore) states that the following is proposed at the site:

- 75 homes and 18 retirements apartments
- 3500 sq m of employment (B1) and/or medical uses (D2)
- Conversion of the chapel to provide a community use
- Reinstatement of the cricket and tennis courts for community uses
- Provision of new landscaping and areas of public open space

In light of your previous comments, I would be grateful if you could consider the above. It would be helpful if you could suggest an appropriate level of non-residential floor space as well as an appropriate number of homes should you consider the proposal to be excessive (accepting that the developer may have evidence suggesting a lesser traffic generation per dwelling is possible).

I look forward to hearing from you.

Thanks again

Ryan

Ryan Greaney BSc MSc MRTPI

Principal Planning Officer

Vickie Page

From: Ryan Greaney
Sent: 12 April 2013 14:51
To: alison.brown@powys.gov.uk
Cc: LDP; Tracy Nettleton
Subject: RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

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I look forward to hearing from you.

Thanks again

Ryan

Ryan Greaney BSc MSc MRTPI

Principal Planning Officer

Brecon Beacons National Park Authority - Awdurdod Parc Cenedlaethol Bannau Brecheiniog

Plas Y Ffynnon

Cambrian Way - Ffordd Cambrian

Brecon - Aberhonddu

LD3 7HP

Telephone - Ffon: 01874 620 431

From: Alison Brown (CSP - Transportation & Development Enablement) [<mailto:alison.brown@powys.gov.uk>]

Sent: 12 April 2013 12:00

To: Ryan Greaney

Subject: RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

Dear Ryan,

The Mid Wales Hospital Site redevelopment proposals so far discussed have always been based on a scheme generating not exceeding about 750 traffic movements per day. At an average of 8 movements per dwelling (6-10 is the norm) I would suggest that about 85-90 units would be the maximum allowable if the site became entirely residential. Any alternative uses would need to be assessed for traffic generation and the figures adjusted accordingly.

I must emphasize that this is purely a numbers exercise in order to provide a guideline figure and that I would have to give consideration to any developer who provided compelling evidence to suggest that a lesser traffic generation per unit was possible.

I hope this helps

Regards,

Alison

Vickie Page

From: alison.brown@powys.gov.uk
Sent: 12 April 2013 12:00
To: Ryan Greaney
Subject: RE: BBNPA LDP EXAMINATION - Mid Wales Hospital Site

Dear Ryan,

The Mid Wales Hospital Site redevelopment proposals so far discussed have always been based on a scheme generating not exceeding about 750 traffic movements per day. At an average of 8 movements per dwelling (6-10 is the norm) I would suggest that about 85-90 units would be the maximum allowable if the site became entirely residential. Any alternative uses would need to be assessed for traffic generation and the figures adjusted accordingly.

I must emphasis that this is purely a numbers exercise in order to provide a guideline figure and that I would have to give consideration to any developer who provided compelling evidence to suggest that a lesser traffic generation per unit was possible.

I hope this helps

Regards,

Alison

Alison Brown

Rheolwr Ardal dros Reoli Datblygu (Sir Frycheiniog)

Area Highways Development Control Officer (Brec)

Local and Environmental Services

Cyngor Sir Powys/Powys County Council

Ffon/Tel:0845 607 6060

Ffacs/Fax:01874 611277

Mae'r e bost hwn ac unrhyw atodiad iddo yn gyfrinachol ac fe'i bwriedir ar gyfer y sawl a enwir arno yn unig. Gall gynnwys gwybodaeth freintiedig. Os yw wedi eich cyrraedd trwy gamgymeriad ni ellwch ei gopio, ei ddosbarthu na'i ddangos i unrhyw un arall a dylech gysylltu gyda Cyngor Sir Powys ar unwaith. Mae unrhyw gynnwys nad yw'n ymwneud gyda busnes swyddogol Cyngor Sir Powys yn bersonol i'r awdur ac nid yw'n awdurdodedig gan y Cyngor.

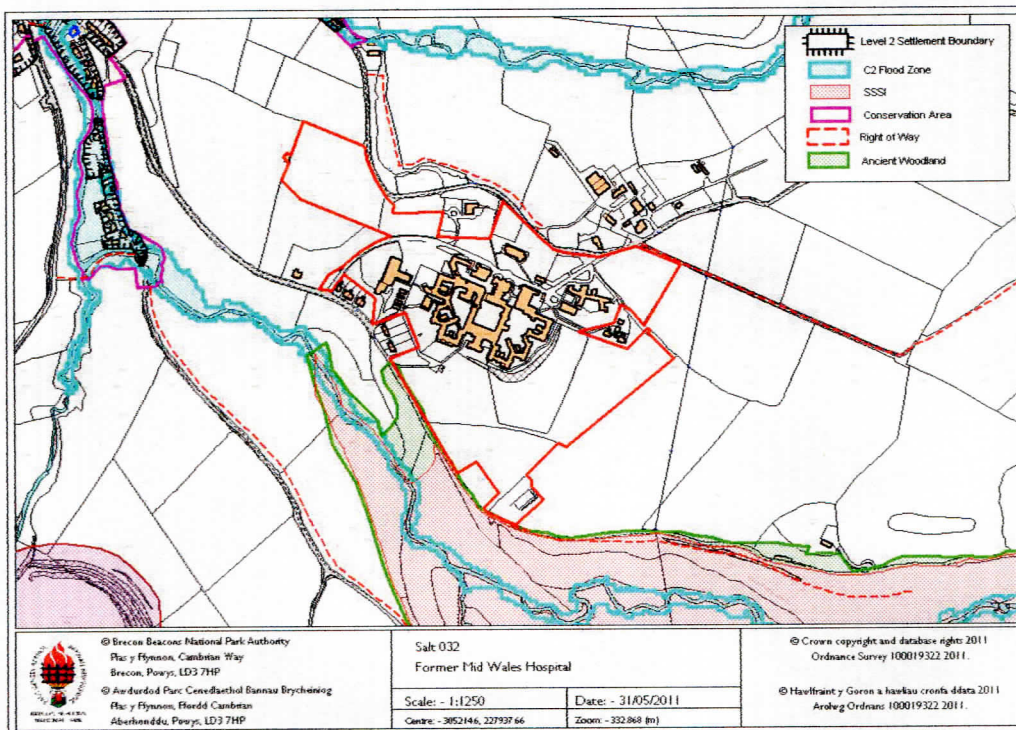
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- SALT 073 – Land adjacent to CS3 Standard Street

A recommendation pertaining to each of these sites is set out in detail within this report:

Site 1
CS111, SALT 032, 033, 036, 047, 062 - The Former Mid-Wales Hospital, Talgarth

Size (ha)	No of dwellings (at 30 dph)
13.5	405
Landowner proposes sustainable mixed use development for housing, employment and other uses – comprising	
<ul style="list-style-type: none"> • 75 homes and 18 retirements apartments • 3500 sq m of employment (B1) and/or medical uses (D2) • Conversion of the chapel to provide a community use • Reinstatement of the cricket and tennis courts for community uses • Provision of new landscaping and areas of public open space 	



This site is a large, brownfield site located approximately 1km outside the Key Settlement of Talgarth. It comprises a complex of former hospital buildings and surrounding parkland.

The site was included in the Adopted Local Plan (1999) as an employment site, and the Approved [UDP](#) as a Mixed Use development site. A [development brief](#) for the site was produced in 1997 by Knight Frank in consultation with the National Park Authority on behalf of the health board, the then owners. This brief set out various options for re-use of the site based around five key principles, the need for continued economic usage; the need for a comprehensive approach to redevelopment, the

need for a flexible approach to mixed use development, continued relationship to the town of Talgarth, and finally the need for a balanced approach to the retention and demolition of buildings.

The site was subject to a [planning application in 2012](#) for 76 residential units, residential care/health facility with retention/refurbishment of the Admin block, chapel and Mortuary to create further employment space and community facilities. This application was refused as it was considered to be contrary to affordable housing policy, unacceptable impact on highways safety, unacceptable impact on Talgarth Conservation area, live work units failed to demonstrate employment as primary usage and incompatibility with the Strategy of the LDP.

The site was submitted as a Candidate Site but it failed at the [Third Stage Assessment](#). The site was then submitted as a [SALT](#) and was assessed as being deliverable but non-compliant with Strategy. The Landowner proposes [sustainable mixed use development for housing, employment and other uses](#) – comprising

- 75 homes and 18 retirements apartments
- 3500 sq m of employment (B1) and/or medical uses (D2)
- Conversion of the chapel to provide a community use
- Reinstatement of the cricket and tennis courts for community uses
- Provision of new landscaping and areas of public open space

The Inspector stated in her [Note](#) that “The former Mid-Wales Hospital site in Talgarth is a previously developed site comprising large derelict buildings in a severe state of dereliction. The developer seeks for the previously developed part of the site (approximately 5 ha) to be allocated for a mix of housing, employment and community use as well as provision of areas of public open space and landscaping. The redevelopment of this site would be phased over 8 – 10 years.

Whilst the site is situated outside the Talgarth settlement boundary, it is within walking and cycling distance of the town (approximately 1 km) and there are regular public bus services linking the site to Hereford and other town centres. The site has previously been allocated for development yet under the LDP the site will be located in open countryside. Without a site specific policy for its redevelopment, I consider that it is unlikely to come forward under the suggested policies of the Plan. In the absence of positive proposals to address the scale and complexity of redevelopment of this site, it is likely to decline further which will exacerbate the detrimental visual impact on the surrounding area and special qualities of the National Park.

Redevelopment of this site could make a significant contribution to the supply of housing towards the end of the Plan period. It would also bring some of the existing derelict buildings back into use and provide employment premises, opportunities for community use as well as public open space. *The combined factors of the identified need for market and affordable housing in Talgarth, the need to foster employment opportunities and to secure the sustainable re-use of this site, clearly point to the previously-developed part of the site being allocated for mixed-use development as outlined above.”*

Whilst it is acknowledged that the Welsh Government recognises that not all previously developed land is suitable for development, it is stated in [Planning Policy Wales \(5th Ed. November 2012\)](#) (PPW) that “Previously developed land should, wherever possible, be used in preference to greenfield sites...”. Given the visual impact and housing supply comments made by the Inspector above, Officers consider on reflection that this site should be included as a mixed use allocated site.

The site has been identified by the Inspector as 'deliverable' and would enable building on previously developed land as well as the retention of some of the existing buildings on site. Evidently, the site is currently disused and an allocation will provide greater certainty with regard to its future development. Indeed, [Paragraph 4.9.2 of PPW](#) advocates the suitability of development on vacant or under-used previously developed sites in and around existing settlements in the interest of the promotion of sustainability objectives. Moreover, its allocation would help in the prevention of further dereliction of existing buildings of merit within the Talgarth Conservation Area.

It is acknowledged that numerous concerns have been raised with regard to the redevelopment of this site, particularly in terms of the potential impact upon the local highway network. Accordingly, and further to the direction given by the Inspector in her [Note](#), advice has been sought from the Powys County Council Highways Authority in relation to the impact of the Landowner's proposals upon the highway network. The Highway Authority state that:

"The scale of development you detail (as set out above)...is, or at least would appear to be, a reduction from the submission last dealt with on the site in so much as there are no longer any live/work units but the reference to B1/D2 use is now in a format (square metres) which doesn't relate easily to the bed numbers previously discussed.

Previously I stated "I am concerned at the scale of the development proposed and also that the supporting T.A shows potential trip rates for the scheme so close to the agreed maximum". If the current discussions are based on a reduction overall from the previously submitted scale then I would suggest that the potential trip generation will also be reduced and I am therefore likely to be, in principle, supportive of such a scheme".

Accordingly, it is reasonable to suggest that the development proposed by the Landowner is acceptable in highway safety terms given the in principle support from the Local Highways Authority.

As a result, Officers consider it appropriate to allocate this site for a mixed use development.

Recommendation 1:

Given the comments made by the Inspector and the advice provided by the Powys County Council Highways Authority, Officers recommend that the site be allocated for mixed use to comprise the following:

- 75 homes and 18 retirements apartments
- 3500 sq m of employment (B1) and/or medical uses (D2)
- Conversion of the chapel to provide a community use
- Reinstatement of the cricket and tennis courts for community uses
- Provision of new landscaping and areas of public open space

(Dwelling Total: 93/200)

APPENDIX C

Lle i enaid gael llonydd
One of Britain's breathing spaces

Mrs J Rumsey
Ty Carreg
Bronllys Road
Talgarth
Brecon
Powys, LD3 0HH

*Received
17/6/2013*

Date: 14th June 2013
Officer: Mr Rhodri Davies
Our Ref: 12/07922/FUL
Your Ref:

Dear Sirs,

Town and Country Planning Act 1990 (as amended)

Address: Former Mid Wales Hospital, Hospital Road, Talgarth, Powys, LD3 0EF

I refer to your letter dated 24th May 2013.

The Former Mid Wales Hospital closed as such at the end of the 1990s / early 2000. Since then there has been sporadic use of some of the buildings and various planning permissions granted, until the site was sold to the present owner. Given the condition of many of the buildings, the Authority's without prejudice view to any subsequent decisions it is asked to make, is that the extent of works necessary to re-use the buildings is likely to be tantamount to development and appropriate planning permissions would need to be sought.

It also lies within the Talgarth Conservation Area and it is a brownfield site / previously developed land.

Planning Policy Wales (5th Edition, November, 2012) at paragraphs 4.9.1 – 4.9.3 states that:

Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high agricultural or ecological value. The Welsh Government recognises that not all previously developed land is suitable for development.

Many previously developed sites in built-up areas may be considered for development because their re-use will promote sustainability objectives. This includes sites:

- *in an around existing settlements where there is vacant or under-used land, commercial property or housing;*
- *in suburban areas close to public transport nodes which might support more intensive use for housing or mixed use;*
- *which secure land for urban extensions, and;*
- *which facilitate the regeneration of existing communities.*

If the Welsh Government's objectives for more sustainable use of land and buildings and the re-use of previously developed sites are to be achieved, local authorities and other stakeholders will need to be more proactive.

Awdurdod Parc Cenedlaethol Bannau Brycheiniog

Plas y Ffynnon, Ffordd Cambrian, Aberhonddu, Powys, LD3 7HP
Ffôn: (01874) 624437 Ffacs: (01874) 622574
E-bost: ymholiadau@bannaubrycheiniog.org
Safle ar y we: www.bannaubrycheiniog.org

Mae'r Awdurdod yn croesawu gohebiaeth yn y Gymraeg neu'r Saesneg

Brecon Beacons National Park Authority

Plas y Ffynnon, Cambrian Way, Brecon, Powys, LD3
Telephone: (01874) 624437 Fax: (01874) 622574
E-mail: enquiries@breconbeacons.org
Website: www.breconbeacons.org

The Authority welcomes correspondence in Welsh or English

The process of establishing the lawful use of land or buildings is via an application to the Authority for a 'Lawful Development Certificate for an Existing Use or Operation' to which a fee is applied. To date such a certificate has not been sought.

I trust this is of assistance.

Yours sincerely



Mr Chris Morgan
Director of Planning, BBNPA

Awdurdod Parc Cenedlaethol Bannau Brycheiniog

Plas y Ffynnon, Ffordd Cambrian, Aberhonddu, Powys, LD3 7HP

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E-mail: enquiries@breconbeacons.org

Website: www.breconbeacons.org

The Authority welcomes correspondence in Welsh or English

TALGARTH TOWN COUNCIL

Mrs Josephine M E Rumsey, Town Clerk

Tel: 01874 711565

Mobile: 07970 547996

E-mail: josephinerumsey@btinternet.com

“Ty-Carreg”

Bronllys Road

Talgarth

Brecon

Powys LD3 0HH

24th May 2013

Mr C Morgan
Director of Planning
Brecon Beacons National Park Authority
Plas y Ffynnon
Cambrian Way
Brecon, Powys LD3 7HP

Dear Mr Morgan

Former Mid Wales Hospital

What is the lawful planning use of the Mid Wales Hospital site?

A certificate of lawfulness was issued in 1996 as a hospital. The hospital has been closed since 2000. There were some changes of use in from 2001 – 2003 but little to effect the main brown field area of the site. Many of these changes of use were not instigated and 106 agreements not signed for. Since then the longstanding situation has been that most of the buildings have been left unoccupied and unused. Now the site is totally deserted and for the past 2 years the site has been barricaded to keep people out.

So in terms of planning what is the lawful planning use? The fact that it was a former hospital does not seem to have any relevance, as for the past 13 years it has ceased to be one.

I look forward to your reply

Please acknowledge safe receipt of this letter.

Yours sincerely

Josephine Rumsey

**Mrs Josephine M E Rumsey
Town Clerk**

APPENDIX D

**Brecon Beacons National Park
Local Development Plan 2007 – 2022**

**Inspector's Preliminary Findings on Housing and Employment
Land Provision: April 2013**

Five Year Supply of Land for Housing

1. The Plan is a long-term strategy but it must also provide short-term delivery. The 5-year land supply requirement is set out in national planning policy guidance. It is important to focus on delivery in order to achieve the objectives of the LDP, particularly as it has less than 10 years left to run. I must thus be satisfied by the evidence that I have seen, read and heard that the sites will come forward in the timescales stated.
2. Planning Policy Wales (PPW) is clear that Local Planning Authorities must "ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing...This means that sites must be **free, or readily freed, from planning, physical or ownership constraints, and economically feasible** for development."¹
3. The National Park Authority (NPA) and Home Builders' Federation (HBF) produced a Statement of Common Ground (SoCG)² which provides two alternative estimates of the likely 5-year housing land supply. The weight to be accorded to this evidence is less than a completed Joint Housing Land Availability Study (JHLAS), but it provides the NPA's own estimate of the sources of housing supply over the next 5 years.
4. If the disputed number of units is included as a starting point, and using a rigid application of the PPW Technical Advice Note (TAN) 1: 'Joint Housing Land Availability Studies' methodology, there would be a land supply of 5.3 years immediately upon adoption of the Plan. However, the disputed units could have a significant impact on the figures and reduce the 5-year land supply by 1.6 years (272 units = 1.6 years).

Table 1³

Source	Units
Under construction	66
Allocations	361
Commitments	366
Small Sites	110
School Sites (committed/allocated)	20
TOTAL	923 = 5.3 years

¹ Planning Policy Wales paragraph 9.2.3. Bold is Inspector's emphasis.

² Housing Land Supply Statement of Common Ground (March 2013)

³ Taken from NPA and HBF Statement of Common Ground

First 5 years “Genuinely Available”

5. For JHLAS purposes, for sites to be genuinely available, they must be allocated in an adopted development plan or have a valid planning permission. These are baseline requirements but other considerations in TAN 1⁴ include how long sites have been in the 5-year land supply. Also, sites should have the necessary infrastructure available within the 5 year period and there should be a reasonable prospect of sites being sold for development where they are not already owned by developers.
6. The ‘JHLAS’ exercise undertaken for the SoCG can only provide an insight. The NPA identifies land which it considers will meet housing requirements for the next 5 years. However, I consider that not all the sites listed could be considered “genuinely available” or deliverable in 5 years, although the majority could be delivered over the Plan period. In my view, the following sites and units could be considered “genuinely available” as part of the 5-year supply of land for housing.

Table 2

Allocations	Units	Commentary
<i>Brecon</i>		
Cwmfalldau Fields	66	
Opposite High School	30	Assumes this site is funded under the new AMP programme and that it will be one of the 1 st to be improved
<i>Gilwern</i>		
Lancaster Drive	112	Aberbaiden WWTW needs upgrading. To upgrade works in next 5 year AMP (2015-20). DCWW says discussing S106. Developers build rate 30-40 dwellings pa on a single site (40 in a good market area)
Bwlch	15	
Libanus	3	
Llanbedr	8	
Llanspyddid	10	
Pennorth	6	
<i>Hay-on-Wye</i>		
Land opp meadows (Gypsy Castle Lane)	20	
Land opp Llanigon	10	
TOTAL	280	

⁴ TAN 1 paragraph 7.3.3 – 7.4.1

7. Dan-y-Bryn & Lancaster Drive, Gilwern – This site is within Category 2 in the agreed 2012 JHLAS SoCG (April 2012). There is some dispute about when an application is likely to be submitted with the worst case scenario put forward by HBF that a decision would be made by April 2014. If this was the case and the developer was willing to contribute towards the necessary upgrade to the sewerage treatment works (Dwr Cymru Welsh Water is said to be in discussion with the developer) then it is feasible that development could commence by 2015. It is generally agreed that the build rate on a single site is between 30–40 dwellings per annum (40 in a good market area). As such, if development started in 2015 and continued - even at the lower rate, then 112 could be substantially delivered within 5 years.
8. If a developer does not contribute to the sewerage upgrade then Dwr Cymru Welsh Water (DCWW) says that the necessary improvements would need to be the subject of an AMP submission for the period 2015-20. According to HBF's evidence this could add a couple more years to the anticipated timescale. Also, that once the site gets underway it is anticipated that there will be a slow build rate. There is little substantive evidence why there would be a slow build rate, particularly if the necessary infrastructure is put in place. Thus, from the evidence before me and for the purposes of this exercise (which is to inform the LDP examination) I am satisfied that there is a reasonable prospect of this site (112 units) being developed within 5 years following adoption of the Plan. As such, it should remain within the 5-year supply period.
9. Land above the Televillage, Crickhowell – the Highways Authority says that given the site's steep nature, development to an adoptable standard in terms of gradients is likely to be extremely difficult. Also, that there is no evidence to suggest that an adoptable road could be created within the site which would limit the number of dwellings to no more than 5. DCWW says that before the site can be delivered improvements would need to be made to a flooding incident. Developers could wait for these works to be undertaken as part of its AMP investment 2015-20 or resolve it earlier by proceeding at their own costs (estimated as 'medium' by DCWW). It is claimed that the owner of the land is seeking to offer an 8-year tenancy on this site. An opt-out clause would take 12 months to terminate the tenancy. These constraints mean that the site is not immediately available for development and it is unlikely that the site would be developed within 5 years. As such, it should not fall within the 5-year land supply.
10. That does not mean that the site cannot be developed within the Plan period, although there is considerable doubt that 40 dwellings would be delivered on this site. Powys County Council (the landowner) considers that in view of the highways and drainage issues, the site could accommodate 20 rather than 40 dwellings. In view of the evidence, I place little reliance on the site delivering 40

units and consider that 20 units would be a more realistic prospect in the longer-term (see Table 4 below).

11. CS137 Hay Road, Talgarth – this site has also been allocated for mixed-use for over 5 years. It is in two separate ownerships surrounded by neighbouring industrial uses and the nearby cattle market. It is not being actively marketed by the owners and there is little evidence that this site is likely to be developed within 5 years. Furthermore, in the absence of any evidence that the landowners seriously intend to bring forward this site for development, the length of time that it has been available and given its constraints, I place little reliance on it providing 23 dwellings over the Plan period.
12. CS136 and DBR-HOW-K, Hay-on-Wye – as a result of evidence provided at the Hearing sessions, the NPA amended the boundary of CS136 to preclude the two dental practices in operation on this site. Revised evidence from the Highways Authority regarding the amended boundary is that access to either of these sites would only be possible if both dental surgeries vacated. There is no evidence that they will do so. Also, in the opinion of the Highways Authority, a satisfactory access from the side of the dental surgeries to serve the development could not be achieved. From my own site inspection, I am not persuaded that an acceptable access to this site or to DBR-HOW-K could be achieved as indicated on the NPA's revised plan. In my view, the sites are unlikely to come forward for development over the Plan period.

Five Year Supply of Land for Housing

13. The 5-year supply of land for housing is thus comprised as follows:

Table 3

Under construction	66
Allocations	280
Commitments	326 (420 with former E-Mag site)
Small sites	110
School sites (committed/allocated) ⁵	20
TOTAL	802 (896)

14. A total of 896 = 5.1 years with former E-Mag factory site; or

15. A total of 802 = 4.6 years without former E-Mag factory site.

16. Outline planning permission has been granted for 94 units at the former E-Mag factory site, Brynmawr. However, there is significant doubt about whether the development will be delivered as the site lies within the proposed route of the dualling of the A465. The

⁵ As per the SoCG – a planning application has been received for (now confirmed to be) 19 dwellings on the primary school site at Govilon

strategic line order for the entire length of the road improvement has been approved, although the detailed line order will be subject to a public Inquiry. It is unlikely that the scheme would be developed until the position with the site is formally established.

17. On this basis, I do not consider that the site is “genuinely available” for housing in the next 5 years. If a minimum 5-year supply of land for housing is to be achieved without relying on delivery of the former E-Mag factory site, additional land for approximately 100 dwellings would need to be allocated which would be deliverable within the first 5 years following adoption of the Plan.

Housing Land Supply: Rest of LDP

18.PPW TAN 6: 'Planning for Sustainable Rural Communities'⁶ says that planning authorities should "ensure that any sites identified for development are effectively available and likely to be brought forward for development by the owner." Also, "Sites that have not been developed between the development plan adoption and review dates should be reassessed."

Table 4

Allocations	BBNPA Units	Disputed Units	Commentary
<i>Brecon</i>			
Swlch House field	23	23	
North Camden Crescent	58	38	Developer's agent said only 38 likely to be achieved
North Cradoc Close	33	33	
Opp High school	107	107	
<i>Crickhowell</i>			
Land above Televillage	40	20	New tenancy to be agreed? Access and drainage constraints
<i>Defynnog</i>			
Glannau Senni	15	15	Categorised 3(i) since 2006
<i>Talgarth</i>			
Hay Road	23	0	In separate ownership, 2007 UDP > 5yrs, evidence of intent?
<i>Hay-on-Wye</i>			
Land adj fire station	13	13	
CS136	18	0	Access and ownership issues
DBR-HOW-K	6	0	Depends on CS136 for access
<i>Govilon</i>			
Land at Ty Clyd	93	93	
Land at Crai	9	9	
SW Gwalia	6	6	
Pencelli	6	6	
Land at Penygarn	6	6	
Dan-y-Coed	3	3	
Pontiscill House	6	6	
<i>Talybont-on-Usk</i>			
Maesmawr Farm	57	57	
TOTAL	522	435	

⁶ PPW TAN 6 paragraph 2.2.4

19. North Camden Crescent, Brecon – at the Hearing session the developer’s agent said that given the topography of the site, 38 would be a more realistic number of dwellings that could be developed at this site. I agree with this analysis and thus consider that a figure of 38 dwellings is more likely to be achieved.
20. Glannau Senni, Defynnog – whilst this site has been allocated for over 5 years the non development of an allocated site in a previous plan does not necessarily mean it is incapable of development and I have seen no substantive evidence which seriously causes me to question its inclusion within the identified supply.

Overall Total

21. Policy SP5 (as amended by AFC-6-9) identifies a supply of land to provide an estimated 1996 dwellings over the LDP period. The SoCG works to a figure of 1990 so for consistency I have used that figure in my calculations throughout this paper.

Table 5

	BBNPA	Disputed units/past build rates
Completions	251	251
Under construction	66	66
Allocations	802	715
Commitments	420	326 (not including E-mag site)
Small sites	430	220
Windfalls	150	150
School sites	107	72
TOTAL	2226	1800

22. A total of 2226 units = a surplus of 236 = 10.6% flexibility allowance

23. A total of 1800 units = a shortfall of 190

Small Sites

24. The NPA allowance for unallocated small sites coming forward is based upon a past completion rate (2001-2011) of 43 dwellings per annum. If the latest 2011 JHLAS (June 2012) is used to inform the small sites allowance this would equate to a total annual allowance of approximately 22 per annum. The contribution from small sites is acknowledged as being “aspirational” with small site completions anticipated at 43 per annum. This estimate is based on an average of relatively erratic delivery rates since 2005 ranging from 17 to 171 per annum.
25. There were thought to be some anomalies in the recorded 171 completions in 2007 as prior to this date the previously published study was in 2000 when 37 small site completions were recorded.

This has been acknowledged in the evidence base, although Welsh Government records show that it is correct, albeit the 171 figure is much higher than previous trends. However, the average rate of completions of small sites has been lower than 43 per annum in the early years of the Plan (since 2007 the average is 23 per annum).

26. The figure thus anticipates an uplift, but the number of small site completions since 2000 are generally declining year on year and there is nothing to suggest that this will significantly reverse. The economy and market conditions could improve but will it be soon enough to make a material difference to the number of windfalls coming forward? Less than 10 years remain in the life of this LDP. Constraints (e.g. water/infrastructure) will affect small site delivery. Level 4 settlements will no longer contribute under the proposed new policies and the 30% affordable housing contribution may reduce delivery in those areas. I consider that a more realistic estimate from this source is 220 dwellings, as put forward by HBF based on the latest JHLAS and past completion data.

Windfalls and School Sites

27. The NPA has made an allowance of 15 dwellings per annum within the LDP supply for windfall sites (not within the 5-year supply but for the rest of the LDP period). The anticipated windfall figure is consistent with evidence submitted to-date which says that the 15 per annum figure was taken from the past windfall completions (2001-2011). In respect of delivery via large sites, provision of housing from large sites has declined (in 2010-2011 there was only 1 dwelling completed on a large windfall site). However, the LDP is anticipating 15 per annum based on a pro-rata figure of 92 over 2001-2007 = 15 per annum. Windfall completions over the last 4 years (2007-2011) also average 15 per annum. I am thus satisfied that the anticipated delivery rate from windfalls is achievable.
28. There is a lot of uncertainty over the school sites with no guarantee that all the schools will close or that if they do, they will come forward for housing or that the numbers anticipated for housing will be delivered. Nonetheless, to allow greater flexibility over the longer-term, an allowance has been made for windfalls from this source, although 35 units have been deducted from the total in light of the evidence regarding the school site in Hay-on-Wye (107-35=72).

Delivery

29. As the Plan stands, approximately 30% (of a total 2226) of the housing provision would be met via non-allocated sites i.e. windfalls. The strategy thus relies heavily on windfalls and the NPA would have little control over whether windfalls will come forward. Such a high reliance on the development of unidentified sites in a National Park where the availability of land for housing development is more strictly controlled will not provide certainty in

the housing land supply and I have concerns that this approach will not deliver sufficient housing (or affordable housing). There is also less certainty in respect of geographical spread which could perpetuate more development in Level 3 Settlements with consequential sustainability implications, including the implications for achieving the Plan's objectives in respect of the settlement hierarchy, employment, viability and affordable housing delivery.

30. The evidence submitted regarding the deliverability of the allocations and the rate of delivery of small windfall sites casts doubt over the ability of the LDP to deliver its target of 1996 units. Further allocations are thus needed to ensure that the target is met. Allocating additional sites would introduce more flexibility and control and reduce such a high reliance upon windfalls coming forward. It would also deliver more affordable housing. If sites for an additional 200 dwellings were allocated then the windfall contribution would equate to 22%. There would be more certainty that the housing would be delivered as well as in respect of its location.

Flexibility Allowance

31. Any combination of unknown factors can affect the development of land. Ideally, there should be some flexibility allowance to provide for unforeseeable circumstances and to deal with the failure of sites listed in the LDP to come forward. Soundness test CE4 requires LDPs to be reasonably flexible to enable them to deal with changing circumstances. Although addressing policies aimed at the phasing of development, PPW⁷ requires LDPs to be flexible, particularly where the development of unidentified (windfall) sites may fall short of the assumptions in the Plan.
32. Windfalls, small sites and school sites are all windfalls. Planning for more than the minimum number of houses required provides a safeguard should these windfalls not come forward at the rate expected and would ensure that the Plan is reasonably flexible. A contingency would also provide a safeguard against unforeseen problems affecting the delivery of allocated sites. It has been accepted as a rule of thumb that a 10% contingency would usually provide the required level of flexibility but more or less may be acceptable depending on the circumstances of each case.
33. A reduction in the number of allocations that can realistically be delivered and in the rate of delivery of small windfall sites as outlined above, would erode the present flexibility allowance (10.6%). However, this flexibility allowance has been subject to change throughout the examination and in previous Hearing sessions the NPA acknowledged that it came out of the process rather than being planned and justified. As discussed in Hearing Session 13, the NPA wish to retain the sites listed in the SoCG as

⁷ PPW paragraph 2.5.2

allocations in the Plan which they regard as providing some flexibility. As already explained, I have serious concerns regarding the deliverability of the anticipated number of units on some of these sites. I have no objection in principle to them remaining as allocations in the Plan and they could provide additional flexibility should they come forward. However, I place no reliance on them.

34. The NPA considers that if the contribution from small sites over the Plan period was 430 dwellings, as put forward in the evidence, then this, together with an additional 200 dwellings from allocations would provide the required flexibility allowance. As stated, I consider that a more realistic estimate from small sites is 220 dwellings over the Plan period. Furthermore, as the Plan currently stands, around 30% of the anticipated dwellings would come from windfalls. The introduction of additional allocations for 200 dwellings, as outlined, would reduce this to 22%, providing more certainty and less reliance on an uncertain source of supply.
35. Nonetheless, allocating additional land to accommodate a further 200 dwellings would not provide a 10% contingency. To do this would require a significant increase in the number of additional allocations which would need to be made in the Primary and Key Settlements in order to comply with the Plan's strategy. The greatest identified need for additional allocations is within the Key Settlements (see Table 6) but only a limited number of sites were put forward as viable alternatives within these settlements.
36. Consideration could be given to allocating additional sites in the Primary Settlement (Brecon) to provide additional flexibility. However, this could cause significant changes to the strategy and substantial delay. Moreover, the need is greatest within the Key Settlements and additional allocations of available sites (as outlined below) would provide more confidence that the LDP could deliver the required number of houses.
37. Furthermore, with the right mechanisms in place, regular monitoring of planning permissions granted would show the rate at which small sites and windfalls were coming forward. Monitoring would also indicate when sites were not coming forward and dwellings not developed as anticipated, which would trigger a review of the Plan. Additional sites could then be considered as part of a review.

Implications for the Plan's Strategy

Implications for the Settlement Strategy

Table 6

Settlement	Completed	U/Con	Commit	Allocated*	Total*
Brecon	69	38	40	317 (297)	464 (444)
Crickhowell	24			40 (20)	64 (44)
Talgarth			53	23 (0)	76 (53)
Hay-on-Wye	21		18	57 (33)	96 (72)
Senn/Defyn			44	15	59

**Figures in brackets represent units as outlined in the SoCG minus the disputed number of units*

38. The Plan's spatial strategy sets out a hierarchy of settlement types. Within Key Settlements development will be focussed to provide new housing opportunities, near to services and facilities as well as employment opportunities serving the needs of the wider community. Additional allocations in Key Settlements would help to concentrate development in accordance with the LDP's spatial distribution strategy. It would also help to re-dress the current imbalance whereby more allocations are proposed in less sustainable Level 3 Settlements than in the Key Settlements.

39. As can be seen from Table 6, there is a need to allocate more sites within the Key Settlements, particularly Crickhowell, Talgarth and Hay-on-Wye.

Crickhowell

40. It is recognised that there is an increasingly aged population in Crickhowell. The Plan recognises that there is a high need for affordable, intermediate and accessible dwellings to meet the needs of retaining younger people and providing future accommodation for the older generation. Providing homes of a range of size, tenure, accessibility and affordability is a priority for Crickhowell as is the need to support the vitality and viability of its retail centre.

Talgarth

41. Talgarth ranks as the third largest settlement and is one of the most sustainable locations for growth in terms of it being able to provide for a good range of day to day needs of its residents within the town itself.⁸ Yet it has seen remarkable decline and experiences a higher level of deprivation than the rest of the Powys area in the National Park. The average age of residents is also

⁸ Key Settlement Issues Paper: Talgarth (September 2009)

higher than the Powys and Wales average. The Plan seeks to actively enable development that contributes to community vitality and to focus on providing innovative approaches to employment provision.

Hay-on-Wye

42. The Hay Assessment⁹ says that Hay-on-Wye is the second most sustainable location for development within the National Park. It provides most services required for the town to be self-sufficient as well as the ability to serve as a key service-centre for smaller outlying settlements. Identified issues for the LDP to address include ensuring that future development maintains and strengthens the important strategic role Hay-on-Wye has. The Plan recognises that house prices are high and that second/holiday home ownership is high. It seeks to ensure that a range of house types and tenure options are provided.

Sennybridge and Defynnog

43. Whilst not identified in the Wales Spatial Plan as part of the 'Brecon Beacons Cluster' comprising Crickhowell, Talgarth and Hay-on-Wye, the NPA has identified the Sennybridge and Defynnog Key Settlement as a Focussed Change (FC-3-P-28). This comprises the separate settlements of Sennybridge and Defynnog and the NPA has provided additional information to support their combined designation as a Key Settlement.¹⁰
44. In accordance with the Settlement Assessment Matrix, Sennybridge was defined as a Level 4A Settlement. It is recognised in the additional information that Sennybridge scored lower as a sustainable location in the Sustainability Index than the other Key Settlements. The area's limited ability to accommodate development is also a factor in its original designation as a Level 4A Settlement.
45. The evidence suggests that the NPA reviewed the status of Sennybridge in light of an identified community desire for growth, to support Sennybridge and Defynnog as a strategic centre for the west of the National Park and as a result of alternative sites put forward such as at Castle Farm and Glannau Senni which would support this position. Given its location, functionality, intended role and the proposed level of development within the Key Settlement, I do not consider it such a priority for identifying additional land for housing development as in the other Key Settlements.
46. In view of the withdrawal of support by the landowner for the land proposed to be allocated at Defynnog Road for employment (see below) and the importance placed on providing employment

⁹ Part One Report 'Hay Assessment' (May 2009)

¹⁰ Additional Work agreed at the Exploratory Meeting held in March 2012 (August 2012)

development opportunities in the West of the area, it is recommended that alternative employment land is identified at an early opportunity, or is considered as part of the LDP review.

Implications for delivery of affordable housing

47. The LDP relies on predominantly on contributions from market housing to provide affordable housing as follows:
- Crickhowell & Hay-on-Wye – 30% affordable housing contribution
 - Brecon, Talgarth & Sennybridge/Defynnog – 20% affordable housing contribution
48. Failure to deliver the required number of dwellings would also affect the provision of affordable housing. Additional allocations for market housing in the Key Settlements would increase the provision of affordable housing.

Employment Sites

49. The loss of employment allocations DBR-HOW-E (0.6 ha) at Hay-on-Wye and SALT 016/058 (1.43) at Sennybridge means that the total land allocated for employment in the Plan is now 1.46 ha. This has implications for the recommendations and conclusions of the Employment Land Review (ELR) which recommended that 1.5 ha is allocated from 2012-22 as a **minimum**. The ELR also recommended that the LDP should foster smaller start-up units.

Recommendations

50. For the above reasons, additional housing allocations should be made for at least 200 dwellings, 100 of which should be deliverable within the first 5 years following adoption of the Plan. If, as discussed at Hearing session 13, the NPA still wish to allocate those sites in Table 4 which include the disputed number of units, my recommendations in relation to increasing the allocations will have a knock-on effect on the supply. This will mean that the submitted Plan's housing supply figure of 1996 dwellings should also be increased by at least 200 dwellings. As outlined above, as I place no reliance on the disputed number of units being delivered, the increased supply does not equate to an oversupply which would result in unsustainable development.
51. There is scope to make additional housing allocations of the suggested scale without departing from the strategy. Whilst this would not provide a 10% flexibility allowance, there would be less of a reliance on windfalls and thus more certainty and confidence that the LDP could deliver the required number of houses. Higher figures such as those suggested of 700+ dwellings (including a flexibility allowance) sought by some Representors could not be accommodated without significant changes to the strategy which

would require withdrawal of the current Plan. An increase of that magnitude is not warranted by the submitted evidence.

52. As identified there is a need to increase allocations in the Key Settlements, particularly Crickhowell, Talgarth and Hay-on-Wye. Alternative sites in these Key Settlements that have been the subject of sustainability appraisal should be considered. In accordance with PPW¹¹ the preferred approach to increasing the housing supply by means of site allocations should be firstly to use previously-developed land. To comply with the search sequence, once these sites have been considered settlement extensions and then new development around settlements with good public transport links should then be evaluated.

53. Alternative sites have been put forward including the following:

Crickhowell

54. SALT 061 (Land adjacent to Llangenny Lane) – the site is said to be immediately available and could provide approximately 20 dwellings (to allow for a buffer around the water main which runs across the site and for appropriate boundary treatment). More units may be provided dependent upon moving the water main. There are no known constraints in respect of water and sewerage infrastructure or in respect of highways considerations.

55. SALT 072 (Land adjacent to Standard Street) – the site is said to be immediately available and could provide approximately 5 units.

56. SALT 073 (Land adjacent to CS3 Standard Street) – the site is said to be immediately available and could accommodate approximately 17 units. There are no known constraints in respect of water and sewerage infrastructure for this and the above site. The evidence submitted by the Highways Authority identifies that the length of frontage onto the adopted highway is limited and that the steep gradients of both of these sites may mean that achieving an appropriate access and estate road gradients may be difficult. The landowner says that there are no known land stability issues and a site layout should be possible with skilful design.

57. The above sites are available for development now, and could make an important contribution towards the housing land supply as well as to the provision of affordable housing. They are also in a Key Settlement with an identified high need for housing and affordable housing where there is very little housing development proposed and only one site allocated where there are doubts about its ability to deliver the anticipated number of units.

¹¹ PPW paragraph 9.2.9 and 9.2.10

Glangrwyney

58. SALT 050 (Former Army Camp at Cwrt-y-Gollen) – the landowner seeks for the area of previously developed land (3.7 ha) to be allocated for housing and employment uses, community facilities and on-site open space provision. A planning application has been submitted to the NPA for 50 dwellings, 18 apartments, conversion of the existing former Headquarters building and Guardhouse as well as construction of buildings for employment use, including some business start up units.
59. Notwithstanding the current application and without prejudice to the outcome, it has been suggested that approximately 50 – 70 dwellings could be accommodated in the area of land proposed to be allocated, subject to considerations of appropriate scale and detail. It is anticipated that development could be delivered within a 3-5 year timescale.
60. The site is outside Crickhowell located approximately 2 km to the east of the town centre. However, there is a bus route linking the site to Crickhowell and Abergavenny. Furthermore, Glangrwyney was identified as a sustainable location in the Sustainability Index. Whilst a previous application was refused (and at appeal) for re-development of this site, that application was for a much larger scheme. I have little evidence that the principle of re-development of this site would be unacceptable, particularly as the site has been allocated previously.
61. PPW makes allowance for sites for employment in rural locations to be developed at the edge of settlements.¹² Without a positive proposal for re-development of this site it is likely to deteriorate with a detrimental visual impact of the special qualities of the National Park. As discussed at previous Hearings, I am not persuaded that this site could come forward for redevelopment through the proposed policies in the Plan. The combined considerations of the identified need for housing (market and affordable) and employment, the limited number of readily identifiable housing sites in Crickhowell to meet this need, and having regard to wider planning objectives in respect of fostering sustainable communities strongly suggest that the previously developed part of the site should be allocated for mixed-use development as outlined above.
62. The site could be developed immediately and I consider that its development could make a significant contribution to the 5-year land supply of housing as well as to the provision of affordable housing and employment and start-up business premises for which there is an identified need.

¹² PPW paragraph 7.3.2

Talgarth

63. SALT 087 (Land adjacent to main car park) – there are no significant constraints to development of this site and the NPA acknowledge that this site could be developed for housing, in principle (a planning application for 9 dwellings was withdrawn). The NPA also recognise the potential of the site as a gateway to the town for a more high profile use to benefit the town, such as for employment.
64. SALT 035 & 049 (Land adjacent to Hay Road) – the site is situated north of CS137 and was previously allocated for employment use. There are no significant constraints to development of this site for mixed-use or employment.
65. SALT 037, 048 & 055 (Proposed extension to site T9) – there are no significant obstacles to development of this site for housing. It is estimated that approximately 35 – 50 dwellings could be accommodated on this site. Whilst this site may be the preferred location for a new Primary School, the site could be allocated for mixed-use to accommodate both the school and some residential development.
66. SALT 003 (Land adjacent to Coed-y-Bryn) – evidence from the Highways Authority suggests that there are significant obstacles to delivery of this site. At the Hearing session the NPA indicated that, subject to demonstrating that a suitable access could be provided, the site could come forward for affordable housing as an exception site.
67. The former Mid-Wales Hospital site in Talgarth is a previously developed site comprising large derelict buildings in a severe state of dereliction. The developer seeks for the previously developed part of the site (approximately 5 ha) to be allocated for a mix of housing, employment and community use as well as provision of areas of public open space and landscaping. The redevelopment of this site would be phased over 8 – 10 years.
68. Whilst the site is situated outside the Talgarth settlement boundary, it is within walking and cycling distance of the town (approximately 1 km) and there are regular public bus services linking the site to Hereford and other town centres. The site has previously been allocated for development yet under the LDP the site will be located in open countryside. Without a site specific policy for its redevelopment, I consider that it is unlikely to come forward under the suggested policies of the Plan. In the absence of positive proposals to address the scale and complexity of redevelopment of this site, it is likely to decline further which will exacerbate the detrimental visual impact on the surrounding area and special qualities of the National Park.

69. Redevelopment of this site could make a significant contribution to the supply of housing towards the end of the Plan period. It would also bring some of the existing derelict buildings back into use and provide employment premises, opportunities for community use as well as public open space. The combined factors of the identified need for market and affordable housing in Talgarth, the need to foster employment opportunities and to secure the sustainable re-use of this site, clearly point to the previously-developed part of the site being allocated for mixed-use development as outlined above.

Hay-on-Wye

70. DBR-HOW-A (Land opposite The Meadows) – part of the site is allocated for 20 dwellings. However, the landowner is seeking for the whole site to be allocated which could accommodate approximately 60 dwellings. There are no known obstacles or significant constraints to development of the whole of this site, which could be developed immediately. Allocating the whole site would contribute significantly towards the 5-year land supply of housing as well as providing market and affordable homes for which there is an identified need.
71. SALT 059 (Land adjoining Brecon Pharmaceuticals) – there are no known constraints to development of this site for up to 5 dwellings.

Conclusion and Next Steps

72. From the evidence I have seen, read and heard I have serious doubts about the deliverability of some of the sites included in the LDP supply which will have implications regarding whether the Plan will deliver its target of 1996 dwellings. There is a risk that the Plan may be found unsound by reason of short comings in the evidence supporting the delivery of sufficient housing. However the amount of the additional identified housing need and the supply needed to address it is relatively modest. It is likely to be capable of being addressed by modifications to the Plan without materially affecting the Plan's strategy.
73. I therefore conclude that the submitted Plan's requirement for 1996 dwellings should be increased by at least 200 dwellings. It follows that there is a need to allocate additional sites for a least 200 dwellings in the Key Settlements above those already identified in the submitted Plan. The recommended approach is for the National Park Authority (NPA) to identify additional or modified sites for allocation, as outlined above, to meet the additional housing need by making use of sites that have already been the subject of Sustainability Assessment (SA) and consultation.
74. The Strategic Environmental Assessment may require updating and there would need to be a schedule of associated consequential changes to relevant parts of the Plan and the Proposals Map. If the Authority decides to carry out further work on the SA, it must bear

in mind that this is an integral part of the plan making process, which should be transparent and open to public participation. It must not be undertaken as an exercise to justify a predetermined strategy. Whilst these processes would prolong the examination, there should be no need to withdraw the Plan or to formally suspend the process.

75. As outlined above, there is a risk that the Plan will be found unsound if the identified shortfall in the housing supply is not addressed. It would thus be unwise to conclude the Examination with the Plan in its present form. I am unable to set out a timetable until I know how the NPA intend to proceed. To that end, it would be helpful if the Authority could respond with specific proposals to make up the shortfall by 21st May 2013.

R Phillips

INSPECTOR
16 April 2013