

TALGARTH TOWN COUNCIL

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Consultation response of Talgarth Town Council to the Draft Supplementary Planning Guidance, presented in the form of a Development Brief for the former Mid Wales Hospital.

This response has been formulated following an initial meeting of the Town Council on Wednesday October 3rd in Talgarth Town Hall and a subsequent meeting on Wednesday October 10th, also in the Town Hall. During the first meeting the Town Council listened to 5 oral representations which included four local residents and a representative of the developer. At the second meeting the Town Council listened to another 7 oral representations including local residents and the developer himself. All the representations provided useful background evidence to inform Town Councillors in shaping their response to this consultation. The Development Brief has been considered in its entirety, by working through it in page order. This consultation response therefore follows that same numerical format of the document for ease of reference.

Talgarth Town Council wish to make it known that they unanimously want to see the re-development of the former Mid-Wales Hospital site. The site continues to deteriorate and having had the Town Council's hopes raised on many occasions before, they want to see a resolution to this matter. Nevertheless, the Town Council have a duty to the local community to scrutinise what is presented to them to ensure the outcome is the best possible for the town and that policies, rules and regulations have been adhered to. References are made throughout this response to communication with Talgarth Town Council and this will be key throughout all stages of the project.

1.2 Planning Context

1.2.2 *“Within the Local Development Plan, Talgarth is identified as a key settlement...With respect to development, the Plan states that residential and employment uses will be located in key settlements to provide housing and employment opportunities that is accessible without over reliance on the private car.”*

Talgarth Town Council believes that the development as proposed would be 100% reliant on private motor vehicles.

Rebecca Evans AM, Minister for Housing and Regeneration, confirmed she has written to all local authorities in Wales outlining to them the seriousness and the importance the Welsh Government attaches to active travel and the successful implementation of the Active Travel (Wales) Act 2013.¹

¹Assembly Business, Record of Proceedings, 20/9/2016

The Town Council would therefore wish to see more detailed proposals of how any development takes due consideration of the Active Travel Act to provide for and encourage active travel between the former hospital site, the town, the school and other local services, thereby alleviating the reliance on private motor vehicles.

1.2.5 *“The applications were refused permission in May 2013 for the following reasons:*

- *Affordable Housing: The affordable housing provision, by reason of the low number of units proposed and the suggested method of disposal is contrary to policy.*
- *Highway Safety: The size and scale of the development and distance from public transport services and detailed highway design incorporating a lack of number of sufficient parking spaces to serve the development will have a detrimental impact on highway safety.”*

The Town Council wishes to make it known that under no circumstances would it support an application without the on-site provision of a minimum 20% affordable housing.

Highways safety is a major concern. Since the Asylum Bridge, which traverses the river on the route to the former hospital site has been upgraded, it is difficult for larger vehicles to get over it. For example, farm vehicles using the route often have difficulty getting over the bridge. Talgarth Town Council believes the highways infrastructure needs major improvement for the proposed scale of development to take place and they believe this would not be funded by Powys County Council, so the onus is likely to be on the developer.

1.5 Building for Life 12

Talgarth Town Council are pleased to see that the developers have used the standard in producing this Development Brief. Question 4 of the standard is *“Does the development have a mix of housing types and tenures that suit local requirements? Part of the vision for the site is to provide a suitable mix for the area. Recommendations set out in this brief includes that housing type and tenure should respond to the local needs and this can be established through discussions with the local authority.”*

The Town Council are pleased to read this, but they would like reassurance that the mix and tenure of the proposed development have been decided on after consultation with Powys County Council’s housing officers and with consideration given to Powys’s most recent Local Housing Market Assessment.

2.1 Flooding

One of the Town Councillors remembered the occurrence of a flash flood off the mountain many years ago, but this did appear to be a one off experience so accept there are likely to be no flood risks with the development.

2.2 Ecology

Point 2.2.4 makes reference to further surveys being required to support a planning application. The Town Council would like more detail about what surveys are to be required and what timescales are involved with these surveys.

2.4 Access and Movement

2.4.4 *“The LDP allocation of 93 dwellings and 3500 sq.m of B1/D2 is being used to inform the baseline traffic movements. This equates to a total of 890 daily movements to and from the site. This is the number of vehicles that the redevelopment of the scheme should not exceed.”*

The Town Council accepts that previously the site was operating as a hospital, but traffic flows have changed significantly since the site closed in around 1999/2000 and vehicle sizes have changed as well. Despite a proposed increase in the number of dwellings to around 125, it is suggested that there will be no increase in the number of traffic movements from the original planning application of 93 dwellings. There does not appear to be any evidence of a traffic statement to accompany the Development Brief, showing:

- projected traffic flows and speeds
- how the site will be accessed by vehicles of varying sizes
- mitigation measures that will be required to improve site accessibility, and
- the traffic impact on the town.

This matter is fundamental to the development of the former hospital site and it would help Town Councillors, make informed decisions, if such evidence could be made available.

Since the original planning application a number of other factors have to be taken into account relating to access and movement such as the Active Travel (Wales) Act 2013, the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015. The Development Brief does not provide the necessary information needed for Town Councillors to understand how these acts have helped shape the design and thinking behind the development proposals.

2.6 Ground Conditions & Contamination

The Town Council fully appreciate the significant contamination issues to deal with on site and would wish to ensure that with all developments, Powys County Council and other relevant agencies, are kept informed and updated about these matters and that public health and safety is not compromised in any way when works are carried out. The Town Council's view is that it is vital that the contamination issues on the site are attended to, as soon as possible.

2.7 Heritage

2.7.12 The Town Council accept that the likelihood of buried archaeological deposits is identified as being low, but Town Councillors are aware of a war grave on the site which they wish to be safeguarded. There are also potentially other graves on site behind the former mortuary and the chapel and the Town Council would wish these to be dealt with appropriate sensitivity.

2.8 Opportunities and Constraints

2.8.7 States *"Where possible existing vegetation within and along the edges of the site should be retained."*

The Town Council are pleased to note this, but feel it would be helpful to have more certainty about this matter and be able to see details of what the developer proposes to retain and what the developer intends to remove, including any impact on adjacent neighbours.

2.8.10 *"The whole of the site falls within the Talgarth Conservation Area with the exception of a small area within the southern portion of the site. The Talgarth Conservation Area Appraisal (Dec 2010) (TCAA) sets out that any scheme on the site is required to preserve and / or enhance the character and appearance of the conservation area."*

The Town Council are appreciative of the efforts and resources the developer has put into this Development Brief and believe that an appropriate development scheme will certainly enhance the site, because of the continued degradation of the existing buildings and the site as a whole.

With the demolition of a significant number of buildings likely to be required, subject of course to the justification being made, the Town Council would want to see the retention of as much of the existing on-site materials as possible so they can be incorporated into the new builds of both homes and businesses premises.

4.2 Local Community Consultation

Talgarth Town Council received a relatively short presentation, from the developers on the 14th February 2018. Following the presentation a number of questions were asked and these have been detailed in this section of the Development Brief. Unfortunately answers to the majority of the Town Council's questions have not been forthcoming and these would have been particularly helpful in order for Town Councillors to make informed decisions about this Brief.

4.3 Commercial Consultation

The Town Council are particularly concerned about the question of employment uses of premises on the site and would want to see evidence to ensure the appropriate type of business premises are developed to meet local need and demand. The commercial consultation provides very good details of the local demand for residential properties, but nothing about the local demand for commercial property.

5.1 Concept Evolution

5.1.6 Highlights that the masterplan would accommodate around 125 dwellings. The Town Council wishes to see more certainty about this number with a maximum number of dwellings to be developed on site clearly proposed. Town Councillors also have concerns that the concept has evolved to include areas outside of the original brownfield development area and has encroached on open green space. Justification for this should be provided as part of the concept evolution.

6.0 Common Elements

The Town Council is appreciative of the detail that has gone into this section of the Development Brief as it does help the proposals to become more tangible. Nevertheless Town Councillors still have some concerns and these are detailed below.

6.2. Parking Arrangements

6.2.2 *“In order to cater for the needs of contemporary householders each apartment should have at least one parking space and each house at least two spaces. These spaces should be on plot, or as close and convenient to each property as possible.”*

The Town Council would expect for the CSS Wales Parking Standards 2008 to be adhered to throughout the development.

6.3. Access and Movement

6.3.2 *“The network of routes should be designed to give walkers and cyclists higher priority than drivers, so that residents can walk through the development in comfort and safety”*

The Town Council appreciate the identification of cycling and walking routes within the development, but there needs to be greater thought as to how these routes link to the town and encourage residents to travel actively between them. The identification of a cycling route solely along the main street through the development will do nothing to encourage cycling and therefore will not help with the reduction of car journeys to and from the former hospital site.

6.4 Building Heights & Densities

The Town Council is pleased to see a variety of different height buildings proposed in the Development Brief and believe it helps reflect the character of the buildings that were previously on site.

6.6 Landscape Strategy

Trees are fundamental to the character of the former hospital site and the Town Council is pleased that the Development Brief mentions the retention of as much of its current natural vegetation and tree cover as possible. Town Councillors want to ensure that the developers liaise closely with officers from Powys County Council about all the trees on site, especially those with Tree Preservation Orders (TPOs) in place. The Town Council accepts that some trees which are potentially unsafe, may need to be removed all together, but hope that a sensitive approach is taken to help retain the ambience created by the trees and vegetation throughout the site.

6.7 Sustainable Drainage Strategy

6.7.6 *“Pre-planning discussions are on-going with Welsh Water to establish the capacity of the existing foul sewer network and if any upgrades are required.”*

Welsh Water capacity is a key matter which needs to be clarified before this Development Brief can progress. It is critical to understand the capacity issues with the current network and if it can cope with the increase of the number of new properties proposed.

6.8 Environmental Sustainability

6.8.2 The Town Council are pleased to note the Development Brief proposes the provision of a replacement bat roost, but require certainty that this will be built before any work which may damage existing roost takes place.

6.12 Employment Use

Point 4.3 already details the concerns of the Town Council over the provision of employment opportunities and business premises on the site. The Development Brief should provide more certainty about this matter including detailing at what stage in the development the building of commercial premises will take place. The Brief suggests that the overall development could take up to 8 years to complete, so it is very important that guarantees are put in place to confirm how much of the development can be completed before the need to develop the on-site commercial property. Town Councillors are in agreement that this provision should be made as early as possible in the development process as there is a desperate need to bring employers and new jobs to the area.

7.1 Viability Analysis

The Town Council have already highlighted that they would not accept less than 20% of on-site provision of affordable housing. When purchasing the former hospital site the developer will have carried out due diligence and the requirement to provide affordable housing will have helped determine the purchase price, therefore there should be no argument over the site's viability.

In summation of the above response:

The Town Council appreciates the work done by the developer in producing this Development Brief and are supportive of the project moving forward, but there are three areas about which Talgarth Town Council require certainty, in order to support fully the adoption of the Development Brief.

- An up-to-date traffic statement should be provided in order to address the Town Council's concerns raised in 2.4
- The guarantee that 20% affordable housing will be provided on site, following the oral commitment made to this effect, by Russell Pryce, on behalf of the developer, at the Brecon Beacons National Park Authority Public Consultation Meeting on 8 October 2018 in Talgarth Town Hall
- Details should be provided about the time-frame of the development, in order to guarantee at what stage premises will be provided for employment use

Concerns were raised at the Town Council Meetings about the Development Brief deviating from National Planning Policy and the Local Development Plan. The consultation asked for a response specifically on the Development Brief which Talgarth Town Council have provided. Nevertheless, the Town Council would expect the Brecon Beacons National Park Authority to adhere to National Planning Policy and the policies currently in the LDP during this SPG process, as they have been subject to scrutiny by a Planning Inspector prior to the Plan being adopted.

Please acknowledge receipt of this Talgarth Town Council response.

Yours sincerely

Josephine Rumsey

Mrs Josephine Rumsey
Town Clerk