



Design and Access Statement

including Planning Statement

Proposed conversion of existing first and second floors of commercial property to residential accommodation

Dolanog House, Severn Road, Welshpool,
Powys, SY21 7AR



Summary

Proposal

Proposed conversion of existing first and second floors of commercial property to residential accommodation

Location

Dolanog House, Severn Road, Welshpool, Powys, SY21 7AR

Date

October 2023

Revision B

Project

X110

Applicant

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Local Planning Authority

Powys County Council

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Contents

Section 1

Introduction

Section 2

Site Description

Section 3

Proposed Development

Section 4

Planning History

Section 5

Evaluation Against Planning Policy Framework

Section 6

Conclusion

1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Sienna Ria Ltd to accompany a full planning application for the conversion of existing first and second floors of commercial property to residential accommodation at Dolanog House, Severn Road, Welshpool, Powys, SY21 7AR. The purpose of this planning statement is to provide additional and complementary information to the planning submission, including details of the site, description of the proposed development, recent planning history and how the proposal sits within the context of the national and local planning frameworks. It has been updated to reflect comments made in pre-application response reference 23/0015/PRE. d. 16th of February 2023, and also comments received through the Pre-Application Consultation (PAC) process dated 11th of September 2023.
- 1.2 The existing building is 3 storeys in height, comprising a Job Centre on the ground floor and office accommodation on the first and second floors. It is the intention to retain the Job Centre on the ground floor and look to convert the first and second floor office areas into residential accommodation.

1.0 INTRODUCTION

1.3 This planning application is accompanied by the following drawings:

<i>DRAWING TITLE</i>	<i>DRAWING NUMBER</i>	<i>PREPARED BY</i>
<i>Location Plan</i>	<i>3a.3.001</i>	<i>Hughes Architects</i>
<i>Existing Block Plan</i>	<i>3a.3.002</i>	<i>Hughes Architects</i>
<i>Proposed Block Plan</i>	<i>3a.3.003</i>	<i>Hughes Architects</i>
<i>Existing Site Plan</i>	<i>3a.3.100</i>	<i>Hughes Architects</i>
<i>Existing Ground Floor Plan</i>	<i>3a.1.101</i>	<i>Hughes Architects</i>
<i>Existing First and Second Floor Plans</i>	<i>3a.1.102</i>	<i>Hughes Architects</i>
<i>Existing Elevations</i>	<i>3a.1.110</i>	<i>Hughes Architects</i>
<i>Proposed Site Plan</i>	<i>3a.1.200</i>	<i>Hughes Architects</i>
<i>Proposed Ground Floor Plan</i>	<i>3a.1.201</i>	<i>Hughes Architects</i>
<i>Proposed First & Second Floor Plan</i>	<i>3a.1.202</i>	<i>Hughes Architects</i>
<i>Proposed Biodiversity Enhancement Plan</i>	<i>3a.1.203</i>	<i>Hughes Architects</i>
<i>Distances from Cottages</i>	<i>3a.1.204</i>	<i>Hughes Architects</i>
<i>Indicative Lighting Plan</i>	<i>3a.1.205</i>	<i>Hughes Architects</i>
<i>Proposed Elevations</i>	<i>3a.1.210</i>	<i>Hughes Architects</i>
<i>Proposed Cycle Storage</i>	<i>3a.3.300</i>	<i>Hughes Architects</i>
<i>Proposed Domestic Bin Storage</i>	<i>3a.3.301</i>	<i>Hughes Architects</i>
<i>Proposed Commercial Bin Storage</i>	<i>3a.3.302</i>	<i>Hughes Architects</i>
<i>Detail 1 - Floor Detail</i>	<i>3a.3.400</i>	<i>Hughes Architects</i>

2.0 SITE DESCRIPTION

- 2.1 This application relates to the proposed conversion of existing first and second floors of the commercial property to residential accommodation at Dolanog House, Severn Road, Welshpool, Powys, SY21 7AR. The existing accommodation has been empty on the first and second floors for some time now, with the majority vacant for over 3 years.
- 2.2 The site is located at grid reference SJ227073: 322702 (eastings) , 307309 (northings) :What3words partners.snowstorm.range
- 2.2 The existing building is 3 storeys in height, comprising a Job Centre on the ground floor and office accommodation on the first and second floors. It is the intention to retain the Job Centre on the ground floor and converting the first and second floor office areas into residential accommodation.
- 2.3 The existing building is 3 storeys high and is of architectural styling that suggests it was built in the late 1960s or early 1970s. It has remained virtually the same since it was built, save for replacement windows.
- 2.4 The site benefits from an existing access point onto the B4381 Severn Road. There is an automated boom system which affords access into a private car park to the rear of the premises.
- 2.5 The existing accommodation has been empty on the first and second floors for some time now, with the majority vacant for over 3 years.
- 2.6 The front of the site is defined by a mature hedgerow which has grown over an existing wall. The building is set back some 14m from this front boundary wall.
- 2.6 Whilst the site is divorced from Welshpool Town Centre by the canal bridge, it is in easy walking distance.
- 2.7 Severn Road comprises several Listed Buildings to both sides. In planning terms, this site is outside of the Conservation Area of Welshpool.
- 2.8 The existing Listed Buildings in close proximity of this site are as follows:
- Powysland Museum, Cadw ref: 7851
 - Dolanog Cottages, Cadw ref: 7846
 - Clive Place 1, Cadw ref: 7840
 - Clive Place 2, Cadw ref: 7841
 - Clive Place 3, Cadw ref: 7842
 - Welshpool Town Loch, Cadw ref: 16729
 - Clive House, Cadw ref: 7843

- 2.9 From a review of the Ordnance Survey maps of 1884, while the majority of context at the time was related to the canal, the site which is the subject of this planning application was part of the grounds of “old” Dolanog House. Old Dolanog House stood roughly in the location of the existing Bupa care home to the rear and south-west of this site.
- 2.10 In terms of architectural styling, the existing building is somewhat incongruous with its setting, but provides a robust structure that is readily convertible to residential accommodation without negative impact upon neither the town nor the Conservation Area.
- 2.11 It is not the intention to make any changes to the external building envelope of this building to facilitate the conversion of the first and second floors into residential accommodation.
- 2.12 There is no recent planning history associated with this site. Contiguous sites are:
- P20090444 –Welshpool Fire Station
 - P20130698 and P20130700 at the Former Canal Warehouse, Severn Rd.
- 2.13 In the words of the Local Authority, in the pre-application response (Ref 23/0015/PRE):

Site Location and Description

This pre-application relates to a site which is located within the town centre area for Welshpool. The site is located adjacent to (but not in) the Welshpool Conservation Area. There are a number of listed buildings in the vicinity, including across the road and to the side-rear of the building.

The site currently consists of a three-storey office block at Dolanog House, Severn Road. Welshpool is identified as a Town within the Powys Local Development Plan (Adopted 2018). The site is located just off the B4381 county highway.

This pre-application seeks advice to change the use of first and second floors of the building from offices to residential accommodation (intention of 22 flats). The ground floor is to be retained as office use.

3.0 PROPOSED DEVELOPMENT

Type of Application Proposal

- 3.1 A full planning application is made with a fully detailed scheme presented here.
- 3.2 The application is accompanied by a site layout, floor plans and elevations. This demonstrates how the first and second floors of the commercial building will be converted into residential flats.
- 3.3 The existing building is 3 storeys high and is of architectural styling that suggests it was built in the late 1960s or early 1970s. It has remained virtually the same since it was built, save for replacement windows. It is not the intention to make any changes to the external building envelope of this building to facilitate the conversion of the first and second floors into residential accommodation.

3.4 Design:

- 3.4.1 The design will seek to convert an existing under-used part of a building into viable reuse in the form of much needed flatted accommodation which will work well in terms of supporting the continued viability of Welshpool Town Centre.
- 3.4.2 As part of the conversion it is expected that existing walls, floors and ceilings will be insulated to improve their thermal performance, while providing compliance with party wall and party floor legislation.
- 3.4.3 It is the intention to retain much of the existing site as possible, however, the existing parking layout does not meet the required standards set out in CSS Wales Parking Standards (2014) and therefore new provisions need to be made. This was identified by the Local Highways Authority (LHA) during the PAC and we have endeavoured to accommodate all of the advice within the confines of the urban brownfield site. The new layout includes 47 parking spaces, comprising of 1 per dwelling (22) as set out in the above standards. The retained commercial unit will utilise the remaining spaces (25), which although not the recommended standard, is offset by the site's sustainable location in public transport terms. The site benefits from a central location in a thriving market town, being in walking distance from several large parking areas, bus stops, and Welshpool train station (Refer to Section 4.7). This not only provides adequate access to the site, but will encourage users to utilise sustainable means of transport in line with current Welsh Government guidance.

3.5 Layout:

- 3.5.1 It is the intention to retain the existing layout of the building with no external changes. The only changes that are to be considered under the auspices of this planning application submission are those in terms of internal wall arrangements to facilitate its conversion into residential accommodation.
- 3.5.2 Given the size of the flats that are to be created, there will need to be provision for refuse and recycling. As per the advice of the LHA, an adequate bin storage area has been provided with enough space for one wheeled bin, and recycling receptacles for each dwelling, as well as a large communal bin store for the commercial premises. For ease of collection, these have been located at the front of the site. Details of this bin storage area can be seen in drawing 3a.3.301 and 302 respectively.

Highways and Access

- 3.6.1 There is an existing access onto the B4381 Severn Road, which shall be retained as part of this proposal. There is an existing secure private car park which shall be retained as part of this proposal to share parking between the ground floor commercial usage, which is to be retained, and the first and second floor usage as proposed.
- 3.6.2 There are 47 no. car parking spaces and they shall be divided between the commercial and proposed residential usages as follows:
- 22 residential spaces (1 no. per flat)
 - 25 commercial spaces
- 3.6.3 National Cycle Route 81 tracks along Severn Road and there will be easy access onto the cycle network. Provision has also be made for the storage of 20 cycles, creating the opportunity for residents and employees to take advantage of it the site's connections.
- 3.7 Peripheral Matters:**
- 3.7.1 It is understood that a Building Regulations application will be required to convert the first and second floor office space into residential. This will bring forward the installation of sprinkler systems to provide Part B compliance and each of the flats shall be heated separately.
- 3.7.2 As mentioned above, consequential improvements shall be necessary to convert the existing offices into flats in the form of additional floor, wall and ceiling insulation. Consideration will be given to replacement of windows, but those existing appear contemporary, so could form part of Part L compliance.
- 3.8 Biodiversity:**
- 3.8.1 There is no ambition to change any part of the building envelope and from a cursory inspection of the structure, it is highly unlikely that it shall be used by bats. Consequently, it has been agreed via the pre-application submission reference 23/0015/PRE that no additional reporting is necessary. There is limited biodiversity on the existing site but we are proposing to add new trees in the car park, within a planting bed, as indicated on the site plan.
- 3.8.2 Due to LHA requiring the widening of the vehicular access to the site, the pedestrian access has been relocated from it's existing location, alongside the vehicular access. This can be done by removing a small section of wall and once self-seeded shrub to accommodate a new pedestrian footpath into the site. There are no distinct hedgerows or trees that will need to be removed to facilitate this development and it is acknowledged that biodiversity enhancements are proposed in drawing no. 3a.1.203.
- 3.8.3 We are alert to the fact that external lighting will be kept to a minimum, and will be designed as to avoid light pollution.
- 3.8.4 The site, as existing, is surrounded by multiple trees and hedgerows, photos of which are on the following page.

3.8.4 Figure I-6 Photographs of the Existing Carpark, Identifying the Level of Existing Vegetation.



3.9 Environmental Health:

3.9.1 Given the proposed mixed use of the building, it is acknowledged that there will need to be separation in terms of noise and acoustic performance between the commercial usage on the ground floor, and residential above. Following advice from the EHO at Pre-Application stage a construction drawing detailing the proposed party floor arrangement to comply with building regulations and provide acoustic betterment is included in the planning drawings.

3.10 Services:

3.10.1 The existing building is connected to existing mains water, gas and electricity and while there will need to be separation for each of the flats, it is anticipated that there is a capacity in the existing network for the conversion of the upper floors to residential.

3.10.2 Given that there is no ambition to change the building form, it has been confirmed that a SAB application is not necessary.

Community Safety

3.11 The building will require PAS24 - Secure by Design windows and doors to ensure security.

Foul and Surface Water Drainage

3.12 The existing building is connected to existing mains water, gas and electricity and while there will need to be separation for each of the flats, it is anticipated that there is a capacity in the existing network for the conversion of the upper floors to residential. Given that there is no ambition to change the building form, it has been confirmed that a SAB application is not necessary.

Flood Risk

3.15 The site is outside of any flood risk as demonstrated in the figure below:

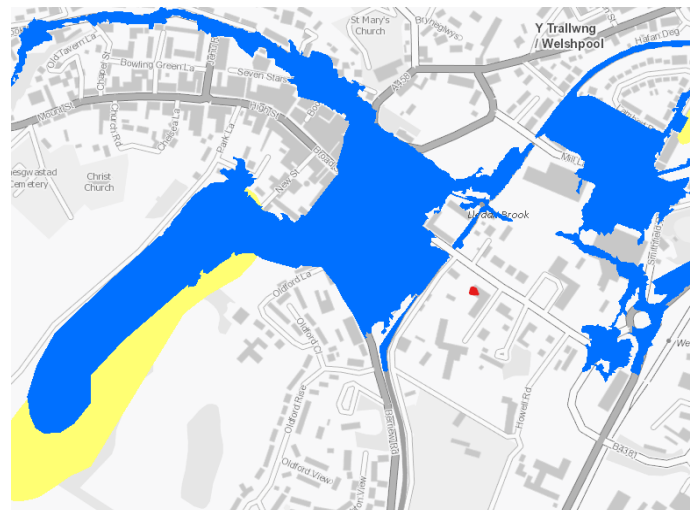


Figure 7 Excerpt from Flood Risk Map - site noted by red dot

4.0 PLANNING POLICIES

4.1 The following planning policies are considered key to the proposed development;

National Planning Policy:

- Future Wales – The National Plan 2040
- Planning Policy Wales (Edition 11)
- Technical Advice Note 5 – Nature, Conservation and Planning
- Technical Advice Note 11 - Noise
- Technical Advice Note 12 – Design
- Technical Advice Note 16 - Sport, Recreation and Open Space
- Technical Advice Note 18 – Transport
- Technical Advice Note 23 – Economical Development
- Technical Advice Note 24 – The Historic Environment

Local Planning Policy:

Powys Local Development Plan (2011-2026)

- SP1 – Housing Growth
 - SP5 - Settlement Hierarchy
 - SP6 – Distribution of Growth Across the Settlement Hierarchy
 - SP7 – Safeguarding of Strategic Resources and Assets
 - DM2 – The Natural Environment
 - DM7 – External Lighting
 - DM13 – Design and Resources
 - DM15 – Waste within Developments
 - R3 – Development within Town Centres
 - H1 – Housing Development Proposals
 - H3 – Housing Delivery
 - H5 – Affordable Housing
 - T1 – Travel, Traffic and Transport Infrastructure
-
- Supplementary Planning Guidance – Residential Design Guide
 - Supplementary Planning Guidance – Biodiversity and Geodiversity
 - Supplementary Planning Guidance – Historic Environment
 - Supplementary Planning Guidance – Conservation
 - Supplementary Planning Guidance – Affordable Housing.

- 4.2 The proposal is the conversion of existing first and second floors of the commercial property to residential accommodation. There is no intention to make any changes to the existing building envelope as part of this planning application.
- 4.3 In planning terms, the site is set within the Settlement Boundary of Welshpool and can be seen as denoted below as part of PCC LDP Inset Map P57E. There will therefore, be a presumption in favour of developments on this site, which is very well connected in terms of active travel to the town centre.

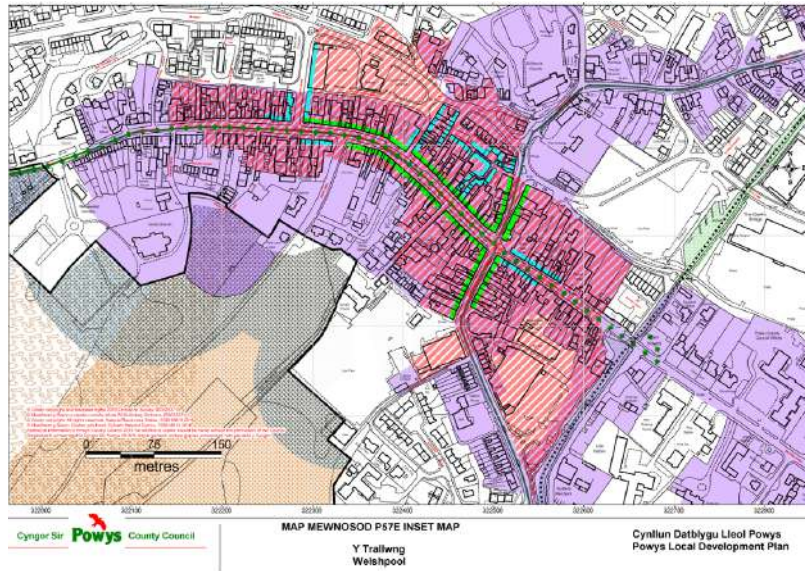


Figure 8 PCC Inset Map P57E

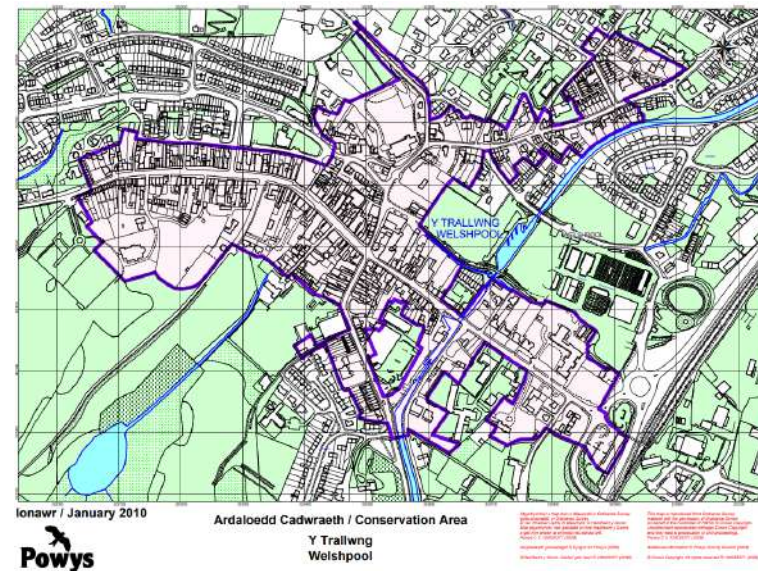



Figure 9 PCC Conservation Area map

- 4.4 The site also sits outside of the Welshpool Conservation Area as denoted in Figure 9 above. It goes without saying, however, there are several listed buildings in close proximity to this site as indicated earlier in this document, but as there is no ambition to change the visual amenity of this particular building, this will have a neutral impact upon those listed buildings.
- 4.5 The site is very well connected in terms of public transport, being within walking distance to the Welshpool bus station and train station.

- 
- 4.6 Welshpool has a secondary school, several primary schools and nurseries, churches, shops, offices and multiple places of employment. The Settlement is defined as a town in LDPI – towns “are the most densely populated Settlements. All are important Service Centres providing a range of services, facilities and employment for their population and their surrounding areas. They are generally the chosen location for “area services” and in particular larger scale public services (e.g. high schools, leisure centres). Towns are also the most accessible settlements, most being located on trunk roads with all having public transport services.”
- 4.7 Welshpool is very well catered for in terms of public transport. The local bus station has regular bus routes 11, 71, 74, 76, 76a, 81, 87, 88, 89, T12, X75, 409 (National Express), all of which are generally 2-hourly services. The mainline train station has hourly and 2-hourly services to Shrewsbury and Aberystwyth. Both stations are around 400m from the pre-application site and there will continue to be full vehicular and pedestrian connectivity by virtue of this site being converted into alternative usage.
- 4.8 The application site is regarded as urban and brownfield, as there are no changes to the existing building exterior then no ecological reporting is necessary.
- 4.9 Given that there is no change to the existing building, neither LVAs nor HIAa are necessary.
- 4.10 Due to the size of the proposal, it is understood that a proportionate amount of Affordable Housing will be necessary as part of any forthcoming application. Ordinarily, this would be expected at 20% but the viability of the conversion would need to be considered to justify this percentage.
- 4.11 In terms of policy compliance, Policy HI of the LDP is in favour of developing sites within Settlement Boundaries such as this for housing. The expectation is that the Local Authority will fully embrace this opportunity to bring back a redundant part of an existing building into viable reuse.
- 4.12 Policies in relation to travel, traffic and transport are noted but we make the point that this brownfield site already has very good access to the highways and active travel network. It is not the intention to change this.

5.0 PLANNING HISTORY

5.1.1 This proposal received pre-application advice from the Local Authority (Reference: 23/0015/PRE).



Gwilym Davies
Head of Property, Planning and Public Protection

County Hall
Spa Road East
Llandrindod Wells
LD1 5LG

Our Ref: 23/0015/PRE
Date: 16 February 2023
Direct Line: 01597 827161 / 01597 827169
Email: planning.services@powys.gov.uk

Hughes Architects
18 Berriw Street
Welshpool
Powys
SY21 7SQ

Dear Sir/Madam,

Reference: 23/0015/PRE

Proposal: Pre-planning application enquiry in relation to proposed conversion of existing first and second floors of commercial property to residential accommodation
Site Address: Dolanog House, Severn Road, Welshpool, Powys SY21 7AR

Thank you for the preliminary enquiry received by Development Management in respect of the above. Having now had the opportunity to consider the development proposal, I write to offer the following comments based upon information provided with the submission and a desktop assessment of the site.

Principal Planning Policies & Guidance:

I would advise that the following planning policies are considered key to the proposed development;

National Planning Policy:

- Future Wales – The National Plan 2040
- Planning Policy Wales (Edition 11)
- Technical Advice Note 5 – Nature, Conservation and Planning
- Technical Advice Note 11 - Noise
- Technical Advice Note 12 – Design
- Technical Advice Note 16 - Sport, Recreation and Open Space
- Technical Advice Note 18 – Transport
- Technical Advice Note 23 – Economical Development
- Technical Advice Note 24 – The Historic Environment

Local Planning Policy:

Powys Local Development Plan (2011-2026)

- SP1 – Housing Growth
- SP5 - Settlement Hierarchy
- SP6 – Distribution of Growth Across the Settlement Hierarchy
- SP7 – Safeguarding of Strategic Resources and Assets
- DM2 – The Natural Environment
- DM7 – External Lighting
- DM13 – Design and Resources
- DM15 – Waste within Developments
- R3 – Development within Town Centres
- H1 – Housing Development Proposals
- H3 – Housing Delivery
- H5 – Affordable Housing
- T1 – Travel, Traffic and Transport Infrastructure

- Supplementary Planning Guidance – Residential Design Guide
- Supplementary Planning Guidance – Biodiversity and Geodiversity
- Supplementary Planning Guidance – Historic Environment
- Supplementary Planning Guidance – Conservation
- Supplementary Planning Guidance – Affordable Housing.

The Powys Local Development Plan (2011-2026) can be accessed in full on the Council's website, at the following link:

https://en.powys.gov.uk/media/4256/Adopted-Powys-LDP-Written-Statement-April-2018/pdf/Adopted_Powys_LDP_Written_Statement_April_2018.pdf?m=1536134184070

Principal Planning Constraints

LDP Development Boundary
Nearby Listed Buildings
Conservation Area
Canals and Waterways
Surface Water Drainage Area

Planning History

No planning history found.

Site Location and Description

This pre-application relates to a site which is located within the town centre area for Welshpool. The site is located adjacent to (but not in) the Welshpool Conservation Area. There are a number of listed buildings in the vicinity, including across the road and to the

side-rear of the building.

The site currently consists of a three-storey office block at Dolanog House, Severn Road. Welshpool is identified as a Town within the Powys Local Development Plan (Adopted 2018). The site is located just off the B4381 county highway.

This pre-application seeks advice to change the use of first and second floors of the building from offices to residential accommodation (intention of 22 flats). The ground floor is to be retained as office use.

Principle of Development

Policy H1 of the Local Development Plan (LDP) seeks to ensure that housing development is appropriately located and suitable in scale and type to meet Strategic Policies SP1, SP3, SP5 and SP6. It states housing development proposals will only be permitted in a Town:

- i. On sites allocated for housing or on other suitable sites within the development boundary; or*
- ii. On sites forming logical extensions outside development boundaries for affordable housing in accordance with Policy H6.*

It is noted that the site is located within the settlement development boundary for Welshpool which is recognised as a town under the LDP.

The application site is previously used as offices on the first and second floor of the building however will retain its current use on the ground floor. It has been recognised that the upper two floors have been – on the whole - empty and unable to find a tenant for three years.

Although physically near the town centre, it is not formally allocated as the “Town Centre” for the purposes of the LDP, nor is it within a primary or secondary frontage area. It is also not located on land identified for employment purposes.

It is therefore considered that the principle for residential development within this location fundamentally complies with relevant planning policy subject to the following considerations:

Design, Scale & Landscape Impact

With respect to design, specific reference is made to Policy DM13 of the Powys Local Development Plan (2011-2026), and SPG Residential Design.

This policy indicates that development proposals must be able to demonstrate a good quality design and shall have regard to the qualities and amenity of the surrounding area, local infrastructure and resources. The building is adjacent to the Conservation Area, and

therefore will be scrutinised with that in mind.

In this instance, the proposal does not include (aside from potentially carrying out maintenance / upgrading of windows etc) any external amendments. Therefore, whilst the building is somewhat incongruous within the current locality, it is accepted that this design is existing, and therefore the proposal is acceptable in terms of design.

Natural Environment

I note your acknowledgement of the need for biodiversity enhancements.

I note your acknowledgement regarding a PEA – even though the external fabric would not be substantively altered. However, there are substantial hedgerows etc that would be sought to be protected / retained.

I note your acknowledgement regarding external lighting. I would recommend an external lighting plan / statement for a development of this scale as this would save the need for a condition to be discharged. Any external lighting proposed will need to demonstrate compliance with the recommendations outlined in the BCT and ILP Guidance Note 8 Bats and Artificial Lighting (12th September 2018). Full details can be found at <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>.

I note that the majority of the external area would be set aside for car-parking for residents and office-users. However, an element of landscaping should be provided to break this up as it is intensive. It is recommended that details of any landscaping proposed are submitted in a detailed Landscape Planting Scheme to include proposed species mixes, planting and aftercare schedules. We would expect relevant and native planting.

A landscaping plan could be secured through a planning condition. However, the provision of sufficient details submitted with a planning application would avoid the need for a pre-commencement condition requiring this information.

The site is located approximately 100 metres to the south of the Montgomeryshire Canal which is a designated SSSI & SAC. Given the works involved are simply to change the use of the upper floors, it is not considered that this site would be affected. Natural Resources Wales would be consulted on this at full application stage.

Impact upon Neighbouring Privacy & Amenity

In considering the amenities enjoyed by the occupiers of neighbouring properties, consideration has been given to the adopted SPG on Residential Design and LDP Policy DM13.

Criterion 11 of Policy DM13 of the Powys LDP states:

“The amenities enjoyed by the occupants or users of nearby or proposed properties shall not be unacceptably affected by levels of noise, dust, air pollution, litter, odour, hours of operation, overlooking or any other planning matter.”

Be aware that because the building houses offices at this time, there would be presumptions – such as occupancy within usual office working hours and not at weekends – that might not be the case if a building housed residential occupancy. When you submit the application, be aware that it would not be appropriate for “habitable room” – such as bedrooms, lounges, or dining rooms – to be directly facing other habitable rooms in other buildings at a distance of less than 21 metres.

I would suggest that this would be acceptable to the north, east and west, but may be an issue to the dwellings to the SW.

Please note, that the full impact upon neighbouring privacy and amenity would be assessed on-site as part of any subsequent planning application.

Highways Safety

A safe access and parking arrangements are fundamental requirements of any development. In relation to highway safety, specific reference is made to LDP Policies DM13 and T1.

The Powys Highway authority have been consulted and confirm that they have the following comments to make:

Whilst the HA would have no fundamental objection to the proposed conversion of existing first and second floors of commercial property to residential accommodation at Dolanog House, Severn Road, Welshpool, Powys, SY21 7AR.

We note that the site benefits from adequate parking and turning area to the rear of the building, however the existing access point onto county highway B4381 is narrow, and it doesn't allow for simultaneous two-way vehicle movements.

Therefore, the Highway Authority would like to see that widening of the access point is offered with as the part of future formal submission.

Reference Material

Manual for Streets 1 & 2

TAN 18

The Powys Local Development Plan (2011-2026) Policy T1

CSS Wales Parking Standards

Design Manual for Roads & Bridges (DMRB)

PCC Highway Design Guide

PCC Technical Specification for Industrial & Residential Infrastructure”

Active Travel

I note your awareness of the need for Active Travel. I would suggest that within this town centre location, this would be something that would be easily achievable. I do note, though, that there is no cycle storage provision within the car park?

Waste within the development

LDP policy DM15 covers waste within developments. It is appreciated that you will be needing to accommodate an area for domestic refuse and recycling.

Building Regulations

It is noted that it would be necessary to obtain Building Regulations approval and it advised that the Building Regulations team be contacted on: 01874 612290.

The link to the relevant page of the Powys website is attached below for information:

<https://en.powys.gov.uk/article/5893/Building-Regulations>

Environmental Protection

PCC – Environmental Protection have been consulted on the proposal and confirm that that they have the following comments to make on the development:

The agent has recognised in the pre-app Environmental Health/Building control will require a noise assessment for the noise transmission between flats in all directions.

Land Contamination

Comments received from PCC – Contaminated Land Officer, 7th February 2023

There are no recorded contamination issues associated with the subject site.

Listed Buildings

Policies SP7 and DM13 of the adopted Powys Local Development Plan (2011-2026) and TAN 24 (The Historic Environment) seek to ensure that development proposals do not have an unacceptable adverse impact upon a listed building or the setting of a listed building. The site is located in close proximity to a number of listed buildings. However it is appreciated that there will not be any significant external alterations to the property.

An assessment would however be made at application stage whereby the Built Heritage Officer would be consulted.

Affordable Housing

LDP policy H5 sets out the requirements of affordable housing within a development proposal. It requires the Severn Valley to provide a 20% contribution to affordable housing of the proposed housing provision.

One of your specific questions was whether we would consider a viability assessment in terms of the affordability of the scheme for providing those numbers.

Our first response would be to require on-site provision of 20% of the flats being affordable. Off-site provision will only be considered where it can be demonstrated that this would not be appropriate. If you wish to present that the viability shows that 20% is not going to allow the development to reasonably go ahead, you are welcome to do that and I would refer you to the Affordable Housing SPG. However, it would be the presumption that the 20% would be expected UNLESS it is agreed otherwise, rather than us having to justify the 20%.

Density

LPD policy H4 requires a density of 27+ residential units within an urban area. Whilst there is an indication of the floor space in your details, I have not calculated this with the outdoor space that will be given to the proposed flats.

Your proposal would be considered against this and, whilst I am thinking that the density suggested is high due to the proportion of one-bed flats, it would be worth you outlining the density in your submission to ensure it accords with H4.

SuDS

The proposal will not provide any additional (or at least very minimal) buildings or hard surfacing, and therefore will not require a SuDS application.

Planning submission for a Major application

The proposal is for 22 dwelling units and therefore would be considered a Major application. This has additional requirements in terms of statutory pre-application consultation.

This guidance can be found [planning-major-developments-guidance-on-pre-application-consultation.pdf \(gov.wales\)](https://www.gov.wales/topics/planning/help004_wales_en.pdf).

Conclusion

It is considered that the proposed residential development at the site is likely, in principle, to be considered acceptable should any subsequent application be submitted for consideration.

When applying for planning permission this would be considered as a full (major) application. I attach a link to the relevant application form below as well as guidance to consider when applying.

Application Form:

http://ecab.planningportal.co.uk/uploads/appPDF/T6850Form004_wales_en.pdf

Guidance:

http://ecab.planningportal.co.uk/uploads/appPDF/Help004_wales_en.pdf

I trust the above is of assistance. Should you require any further information, please do not hesitate to contact me.

Yours faithfully,

Lorraine Jenkin

Senior Planning Officer.

Croeso i chi gysylltu â ni yn Gymraeg. Byddwn yn ymateb yn Gymraeg, heb oedi.

You are welcome to contact us in Welsh. We will respond in Welsh, without delay.

Data Protection and Privacy / Diogelu Data a Chyfrinachedd

In order to deliver the Planning Service (applications, complaints and appeals etc.) it is necessary for the council to process personal data, in accordance with relevant planning legislation, as listed on the Welsh Governments planning website (<https://gov.wales/topics/planning/?lang=en>). If you wish to know more about how Powys County Council processes your personal data then please visit [Planning and Public Protection Privacy Statement - Powys County Council](https://en.powys.gov.uk/privacy) and / or <https://en.powys.gov.uk/privacy>.

Er mwyn darparu Gwasanaeth Cynllunio (ceisiadau, cwynion ac apeliadau ac ati) mae'n angenrheidiol i'r cyngor brosesu data personol, yn unol â deddfwriaeth gynllunio berthnasol, fel y rhestrir ar wefan gynllunio Llywodraeth Cymru (<https://llyw.cymru/adeiladu-a-chynllunio>). Os hoffech wybod mwy am sut mae Cyngor Sir Powys yn prosesu eich data personol, ewch i <https://cy.powys.gov.uk/article/7085/Datganiad-Preifatrwydd-Cynllunio-a-Gwarchod-y-Cyhoedd> a / neu <https://cy.powys.gov.uk/preifatrwydd>

5.1.2 Principle of Development

In the words of the Local Authority as part of the Pre-App 23/0015/PRE response:

Principle of Development

Policy H1 of the Local Development Plan (LDP) seeks to ensure that housing development is appropriately located and suitable in scale and type to meet Strategic Policies SP1, SP3, SP5 and SP6. It states housing development proposals will only be permitted in a Town:

- i. On sites allocated for housing or on other suitable sites within the development boundary; or*
- ii. On sites forming logical extensions outside development boundaries for affordable housing in accordance with Policy H6.*

It is noted that the site is located within the settlement development boundary for Welshpool which is recognised as a town under the LDP.

The application site is previously used as offices on the first and second floor of the building however will retain its current use on the ground floor. It has been recognised that the upper two floors have been – on the whole - empty and unable to find a tenant for three years.

Although physically near the town centre, it is not formally allocated as the “Town Centre” for the purposes of the LDP, nor is it within a primary or secondary frontage area. It is also not located on land identified for employment purposes.

It is therefore considered that the principle for residential development within this location fundamentally complies with relevant planning policy subject to the following considerations:

5.2 PLANNING HISTORY

5.2 In response to the comments received as part of Pre-App 23/0015/PRE:

5.2.1 Natural Environment

'I note your acknowledgement regarding external lighting. I would recommend an external lighting plan / statement for a development of this scale as this would save the need for a condition to be discharged. Any external lighting proposed will need to demonstrate compliance with the recommendations outlined in the BCT and ILP Guidance Note 8 Bats and Artificial Lighting (12th September 2018). Full details can be found at <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>. I note that the majority of the external area would be set aside for car-parking for residents and office-users. However, an element of landscaping should be provided to break this up as it is intensive.'

In response to the above comments, we have provided an external lighting plan, and we have proposed additional trees within the car park area (as indicated in the proposed site plan - drawing no. 3A.I.200)

5.2.2 Highways Safety

'Whilst the HA would have no fundamental objection to the proposed conversion of existing first and second floors of commercial property to residential accommodation at Dolanog House, Severn Road, Welshpool, Powys, SY21 7AR. We note that the site benefits from adequate parking and turning area to the rear of the building, however the existing access point onto county highway B4381 is narrow, and it doesn't allow for simultaneous two-way vehicle movements. Therefore, the Highway Authority would like to see that widening of the access point is offered with as the part of future formal submission.'

In response to the above comments, we have widened the vehicular entrance to the site, although the amount at which the road could be widened was limited due to the location of a gas substation. This widened road access 1500mm, as has been indicated on the proposed site plan drawing no. 3A.I.200. The attention of the LPA is brought to additional LHA comments as part of the PAC process. These are documented in the PAC report submitted with this planning application.

5.2.3 Active Travel

'I note your awareness of the need for Active Travel. I would suggest that within this town centre location, this would be something that would be easily achievable. I do note, though, that there is no cycle storage provision within the car park?'

In response to the above comments, we have included cycle storage provision in front of the building, as per planning drawing no. 3A.I.200

5.2.4 Waste within the development

'LDP policy DM15 covers waste within developments. It is appreciated that you will be needing to accommodate an area for domestic refuse and recycling.'

In response to the above comments, we have included a domestic refuse and recycling area to the front of the building as per drawing no. 3A.I.200

5.2.5 Building Regulations

We note that it will be necessary to obtain Building Regulations approval and we will be in contact with the Building Regulations team.

5.2.6 Impact upon Neighbouring Privacy & Amenity

'In considering the amenities enjoyed by the occupiers of neighbouring properties, consideration has been given to the adopted SPG on Residential Design and LDP Policy DM13.

Criterion 11 of Policy DM13 of the Powys LDP states:

"The amenities enjoyed by the occupants or users of nearby or proposed properties shall not be unacceptably affected by levels of noise, dust, air pollution, litter, odour, hours of operation, overlooking or any other planning matter."

Be aware that because the building houses offices at this time, there would be presumptions – such as occupancy within usual office working hours and not at weekends – that might not be the case if a building housed residential occupancy. When you submit the application, be aware that it would not be appropriate for "habitable room" – such as bedrooms, lounges, or dining rooms – to be directly facing other habitable rooms in other buildings at a distance of less than 21 metres.

I would suggest that this would be acceptable to the north, east and west, but may be an issue to the dwellings to the SW.

Please note, that the full impact upon neighbouring privacy and amenity would be assessed on-site as part of any subsequent planning application.'

In response to the above, we have attached drawing 204, which clearly states that the distance between the building and the dwellings to the SW is 28.82m at its nearest distance to the boundary of the adjoining property. The actual distance between the nearest part of Dolanog Cottages and the application site is 33.06m.

5.2.7 Environmental Protection

We note that the pre-application advice stated the following:

PCC – Environmental Protection have been consulted on the proposal and confirm that they have the following comments to make on the development:

The agent has recognised in the pre-app Environmental Health/Building control will require a noise assessment for the noise transmission between flats in all directions.

In response to the above, we have attached drawing 400, which is a floor-to-floor detail between the ground floor (commercial) and first floor (residential) of the proposal, illustrating compliance with building regulations of betterment of the proposed different usages within the building.

5.2.8 Land Contamination

We note that the pre-application advice stated the following:

Comments received from PCC – Contaminated Land Officer, 7th February 2023

There are no recorded contamination issues associated with the subject site.

5.2.9 Listed Buildings

We note that the pre-application advice stated the following:

Policies SP7 and DM13 of the adopted Powys Local Development Plan (2011-2026) and TAN 24 (The Historic Environment) seek to ensure that development proposals do not have an unacceptable adverse impact upon a listed building or the setting of a listed building. The site is located in close proximity to a number of listed buildings. However it is appreciated that there will not be any significant external alterations to the property.

An assessment would however be made at application stage whereby the Built Heritage Officer would be consulted. As there are no material changes to the building envelope then Doug Hughes RIBA CA has confirmed that no assessment is necessary.

5.2.10 Affordable Housing

We note that the pre-application advice stated the following:

LDP policy H5 sets out the requirements of affordable housing within a development proposal. It requires the Severn Valley to provide a 20% contribution to affordable housing of the proposed housing provision.

One of your specific questions was whether we would consider a viability assessment in terms of the affordability of the scheme for providing those numbers.

Our first response would be to require on-site provision of 20% of the flats being affordable. Off-site provision will only be considered where it can be demonstrated that this would not be appropriate. If you wish to present that the viability shows that 20% is not going to allow the development to reasonably go ahead, you are welcome to do that and I would refer you to the Affordable Housing SPG. However, it would be the presumption that the 20% would be expected UNLESS it is agreed otherwise, rather than us having to justify the 20%.

We can confirm that 20% of the flats within the development are to DQR standard and are suitable for affordable housing.

5.2.11 SUDS

We note that the pre-application advice stated the following:

The proposal will not provide any additional (or at least very minimal) buildings or hard surfacing, and therefore will not require a SuDS application.

5.2.12 Highways Safety

We note that the advice stated the following:

Whilst the HA would have no fundamental objection to the proposed conversion of existing first and second floors of commercial property to residential accommodation at Dolanog House, Severn Road, Welshpool, Powys SY21 7AR, the following issues should be resolved prior to the submission of any full or detailed application.

As stated on our Pre-Planning Application Enquiry response, the access should be widened to allow the free flow of two-way movements and we note that Drawing Number XI 10.3A.3.104 proposes such. However, this drawing proposes that the barrier keypad be located on the egress lane rather than the access lane, therefore, vehicles accessing the site would be required to drive on the opposite lane to gain access to the development site.

Such an arrangement shall cause conflict[s] on the site access, increase the risk of collision and detriment to highway safety. Therefore, the keypad entry system should be replaced by a system which does not require vehicles to drive on the wrong side, thus reducing the risk of collision.

Any security barrier and/or vehicular access gates should be setback at least 20m from the edge of the adjacent carriageway and be constructed in such a way that prevents them from opening towards the highway.

The forthcoming application should include detail of the planning use and GFA of the ground floor accommodation and detail the parking demand of such in accordance with the CSS Wales Parking Standards (CSS). Furthermore, the same should be submitted for the proposed residential conversion. Appendix 6 of CSS (2014) is the sustainability calculator, and should the applicant propose to reduce the parking strategy for the site, an assessment in accordance with CSS must be submitted.

The submitted assessment must note that the “Maximum Walking Distance” is a round trip along the most appropriate route, and we advise that the walking route should not include private land (third-party) unless that land is within the redline application site and Notice has been served. The routes to local facilities and transport connections should be shown on the proposed route (not as the crow flies) by means of coloured centrelines identifying each of the facilities/transport connections proposed to be considered. It is the responsibility of the applicant to ensure that the sustainability assessment is fit for purpose and in accordance with the guidance within Appendix 6 of CSS.

CSS & the All-Wales Common Standards Guide 2020 state that the standard size of a parking bay is 4.8 x 2.6m, unless the bay is adjacent to a fixed structure, such as a wall, fence or hedge, in which case the parking bay should measure 4.8 x 3m. We note that the parking bays shown on Drawing Number XI 10.3A.3.104 are smaller, therefore the number of parking bays shown on this drawing is overstated.

We note the proposed cycle storage and advise that Appendix 4 of CSS advises that one cycle stand per five bedrooms is required, and further advice is given as to the requirements for commercial premises. Each cycle stand allows for the parking of five cycles, therefore, the proposed provision of ten cycle spaces shown on Drawing Number XI 10.3A.3.104 is insufficient.

A recycling/residual waste collection point should be included with any full or detailed application, the collection point should include sufficient space for one wheeled bin per dwelling/apartment and four recycling receptacles. The collection point should be located in close proximity to the site access and outside of the access visibility splays. The collection point cannot be constructed on the adopted highway.

Our response to the above comments have already been mentioned in section 3 of this document as well as in the PAC report submitted as part of the planning documentation. To summarise

- The security barrier and access keypad have been removed
- The parking layout has been amended so that it complies with CSS Wales Parking Standards 2014, with mitigating factors being included for the reduced numbers
- Cycle storage capacity has been increased and further details have been included on drawing 3a.3.300
- More detail on the storage of refuse has been included in drawing 3a.3.301 and 3a.3.302.

6.0 CONCLUSION

- 6.1 The proposal offers the conversion of an existing, underused brownfield building into viable reuse to sustain an existing town centre. It is an appropriate location for young people, small families or older persons to reside, to sustain the lifeblood of the town of Welshpool.
- 6.2 The pre-application advice received from the Local Authority was that it is considered that the principle for residential development within this location fundamentally complies with relevant planning policy subject to the following considerations: Design, Scale & Landscape Impact (*'whilst the building is somewhat incongruous within the current locality, it is accepted that this design is existing, and therefore the proposal is acceptable in terms of design'*), Natural Environment (an element of landscaping to break up the car park, and an external lighting plan / statement, as this would save the need for a condition to be discharged. Also that any external lighting proposed will need to demonstrate compliance with the recommendations outlined in the BCT and ILP Guidance Note 8 Bats and Artificial Lighting (12th September 2018). All of this information has been submitted as part of the application pack.
- 6.3 Our designs reflect comments received from the local planning authority in regards to highways/access, biodiversity, environmental protection, and active travel.
- 6.4 The Local Planning Authority is asked to give favourable consideration to this application.

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