

Planning Statement

Llanarth Court Hospital, Llanarth, Raglan

Priory Group

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Prepared on Behalf of Tetra Tech Planning

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1. Introduction

1.1 The Proposal

1.1.1 On behalf of the Applicant (Priory Group Limited), Tetra Tech Planning has prepared this Planning Statement in support of an application for Full Planning Permission for the following development proposals:

“Construction of replacement building (total floorspace 2,032sqm) at Llanarth Court Hospital (on the site of the former Treowen Building) to accommodate 2x12-bed medium-security wards (total 24-beds) including accompanying day/recreational space, operational accommodation and staff facilities; construction of enclosed secure garden areas and associated external fencing; and all associated ancillary works”.

1.1.2 The application is submitted further to the grant of Conservation Area Consent by Monmouthshire County Council on 6th August 2020 (application ref. DM/2020/00754) for the demolition of the Treowen Building (in order to secure the site following fire damage sustained in April 2020). The Applicant proposes to replace the much-needed bed space at the Treowen Building with a modern, high-quality hospital building accommodating two 12-bed wards (resulting in an increase in capacity of 5 beds in comparison to the number of beds provided within the former Treowen Building), and incorporating secure outdoor space and associated external fencing. The proposals require an increase in floorspace of 605sqm (over and above that previously accommodated within the Treowen building) in order to provide a hospital ward capable of meeting current regulatory standards.

1.2 Structure of Statement

1.2.1 This Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:

- Section 2: provides a description of the site, its surroundings, an overview of the site’s planning history and a summary of the development proposed;
- Section 3: outlines the relevant planning policy context;
- Section 4: addresses the key planning considerations; and
- Section 5: provides a summary and conclusions.

2. The Site and Surroundings

2.1 The Application Site

- 2.1.1 The site is located within the Llanarth Court Estate, positioned approximately 4.5 miles to the North-West of Raglan and 6.5 miles to the South-East of Abergavenny. The village of Llanarth is located within approximately 700m of the site.
- 2.1.2 The Llanarth Court Estate accommodates the Llanarth Court Hospital, which comprises a 115-bed specialist hospital providing medium and low secure care for men and women with mental illnesses and personality disorders, and men with learning difficulties. Care is provided over seven wards across the site, with buildings on site also providing fitness, leisure and therapeutic facilities.
- 2.1.3 The application site specifically relates to the site of the former ‘Treowen Building’.
- 2.1.4 The former Treowen Building was constructed within the grounds of Llanarth Court in 2005 forming one of hospital’s outlying residential wings. Severe fire damage to the Treowen Building in April 2020 resulted in the need for its demolition. Conservation Area Consent was subsequently granted by Monmouthshire County Council for the demolition of the building on 6th August 2020 (application ref. DM/2020/00754).
- 2.1.5 Prior to demolition, the Treowen Ward comprised of a rectangular single-storey building with part first-floor, planned around a central courtyard. The main accommodation was located on the ground floor comprising bedrooms; lounges; main kitchen and other ancillary accommodation. The first floor consisted of ancillary accommodation and offices. The building accommodated a total of 19-beds.
- 2.1.6 In terms of external elevations, the Treowen Building was relatively plain/functional in appearance typical of its age, comprising render with a fair faced brick plinth and natural slate pitched roof. Windows comprised horizontal casements with top opening lights, with a soldier course of face brick to the head and reconstituted stone cills.
- 2.1.7 The floorspace of the former Treowen Building totalled circa 1,427 sqm. The proposed replacement building primarily utilises the footprint of the former building, whilst accommodating a small extension in floorspace – amounting to an additional 605 sqm (see Proposed Site Plan attached at Appendix 1 and Proposed Layout & Schedule of Accommodation attached at Appendix 2).
- 2.1.8 The site of the replacement building itself is not located within a Flood Risk Zone. However, parts of the surrounding hospital estate, including parts of the vehicular access road to the application site, are located within Flood Zone C2.
- 2.1.9 The application site is accessed via the main estate road. Car parking is provided across the hospital site (comprising a total of 203 parking spaces). The area adjacent to the Treowen

Building has appropriate arrangement of circulation and parking space, which will not be impacted upon by the proposed development.

2.2 Site Surroundings

2.2.1 The Llanarth Court Hospital site is located within a historically sensitive location and is subject to a number of historic designations. The site encompasses the original Llanarth Court country house, which is a Grade II* Listed Building and a further number of buildings/structures located within the Llanarth Court estate are listed. The site is also situated within a Grade II Park and Garden of Special Historic Interest and is located within the Llanarth Conservation Area.

2.2.2 The layout of the Llanarth Court site comprises a tree-lined driveway leading from the public highway south of Llanarth Village to the historic manor house constructed circa 1770, which sits on a raised terrace with views over landscaped grounds to the south, west and north-west. The Grade II* Church of St Mary and St Michael is positioned below.

2.3 Planning History

2.3.1 A review of Monmouthshire County Council's on-line planning history search has identified the following planning history associated with the use of the Llanarth Court site for health care uses.

Application Ref.	Description of Development	Decision	Decision Date
33761	New 52 bed, 2 storey psychiatric block	Approved	03/07/91
36929	Glasshouse & polytunnel	Approved	16/03/94
37426	Alterations to coach house and ancillary buildings	Approved	02/09/94
38722	Two extensions to ward accommodation	Approved	06/09/95
33882	Car park, external lighting	Approved	11/09/95
39320	Replacement of storage building	Approved	01/08/96
M225	Replacement of storage building	Approved	27/02/96
M3453	Self contained female ward unit	Approved	14/10/99
M4033	Lower roadway below arch at Gatehouse (LBC)	Approved	17/01/00
M6251	Dwarf stone walls at gatehouse (LBC)	Refused	12/01/01
M7071	Conversion of garden maintenance building to tribunal room and office	Approved	29/05/02
M7072	Lounge/games room extensions	Approved	29/05/02
M7074	Detached garden maintenance building	Approved	29/05/02
M7974	Detached community care bungalow	Approved	29/02/05
M7593	Long stay hospital ward	Approved	08/04/03
M7598	Detached community care unit comprising 4x4 bedroom sections	Approved	08/04/03
M7994	Demolish redundant storage building, construct detached community care bungalow	Approved	08/04/03
DC/2008/00331	Alteration and extension of new security fences	Approved	29/07/08
DC/2009/00181	Construction of a detached new build garage/storage block. (single storey)	Approved	15/07/09
DC/2013/00569	Visitors/patients cafe stop within the existing grounds	Approved	15/10/13
DC/2014/00955	Discharge of conditions 7, 8, 16, 17 and 18 (flooding) of planning permission DC/2007/00746	Approved	14/10/14

DM/2020/00754	Demolition of fire damaged Treowen building.	Approved	06/08/20
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Llanarth Court Hospital – Planning History

- 2.3.2 As illustrated above, the site has a long-established history of use and development for hospital/care facilities.
- 2.3.3 It is noted that planning permission was granted for the construction of two detached wards on the vacant land parcel to the south of the application site in 2009 (application ref. DC/2007/00746). Although this permission remains unimplemented, it serves to establish that development of extended healthcare facilities within the Llanarth Court hospital site is acceptable in principle (subject to detailed planning considerations).
- 2.3.4 The construction of two detached wards on an undeveloped/greenfield area of the Llanarth Court site (DC/2007/00746) was considered both by Planning Officers and CADW to have no significant impact upon the Llanarth Conservation Area; the registered Llanarth Court Historic Garden; or the adjacent listed buildings. It is therefore considered that the construction of a replacement building on the footprint of a previous building, incorporating a relatively minor increase in floorspace of 605 sqm, should in principle also be considered acceptable in terms of its impact on site’s sensitive historic setting (subject to detailed design considerations discussed in Section 4 of this statement).

2.4 The Proposed Development

- 2.4.1 An application is submitted for Full Planning Permission for the construction of a replacement building at Llanarth Court Hospital to accommodate a medium secure mental health ward comprising of 24 beds (2 x 12 bed wards) with accompanying day/recreational space, operational accommodation, staff facilities and external gardens.
- 2.4.2 The proposed footprint of the development utilises the full extent of the retained ground floor slab from the former building. Due to the scope of accommodation and operational strategy for the proposed building, the extent of this footprint has been extended by circa 9.5 metres to the east along the full width of the retained slab. The reuse of viable sub structure ensures that the majority of the proposed building is contained within the footprint of the former building.
- 2.4.3 There are a number of key differences in the accommodation requirements and building parameters of the proposed building when directly compared against the former. These have been identified and driven by various design/healthcare standards (as set out fully within the Design and Access Statement). The principal points are summarised as follows:
- Bed Numbers – Treowen had 19 beds, the proposal is for 2 x 12 bed units.
 - Height of Eaves – Treowen was 3m, the proposal is 5.2m for single storey elements and perimeter fence.
 - Approach around intent to retain foundations – the razed building had piled foundations which the design looks to try and retain (subject to testing their capacity and condition).
 - Front of House – Treowen had a single door access point for staff and visitors, and a

gated airlock into the garden space, which doubled up as a vehicle drop off area. The proposed contains a dedicated reception and security area, with vehicular access separate to the garden spaces.

- 2.4.4 The layout, form and materiality seek to create a building that will aid the recovery of mental health patients whilst confidently addressing the context and character of the Conservation Area and curtilage of the Grade II* Llanarth Court within the hospital wider site. As set out in the Design and Access Statement, although the form and mass of the proposed building is different from Treowen Ward, fundamentally there will be no consequential impact to sight lines of the relationship between the listed buildings on the hospital site and their immediate/wider context. The proposed development seeks to enhance the site context through the expression of a confident, welcoming contemporary design using a limited palette of high-quality materials. These will be carefully selected to express the building in a controlled manner, with reference to local and historic materials used across the range of listed buildings at Llanarth Court.
- 2.4.5 Boundary conditions have been carefully considered in the space planning of the building in light of the site's sensitive surroundings. The front elevation presents into the wider site, and this is devoid of fencing or any other retaining or security structures. The front elevation is set behind a landscaped frontage, a mixture of planted and grassed areas, with focal planting around the main entrance area and complemented with feature paving leading from the existing road and parking spaces. Secure patient areas are located to the rear of the building.
- 2.4.6 Access to the facility is via the existing road and footpath infrastructure retained. Parking is split between two areas, one to the left of the main entrance, and the other to the right. These are accessed via realigning the exiting access road. Pedestrian paths, focal planting and public realm space announce the main entrance to the building.
- 2.4.7 Reference should be made to the Design and Access Statement (10Architects) which is submitted in support of the Planning Application for full details regarding the design development.

3. Planning Policy Context

3.1 Introduction

- 3.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section provides an overview of extant and emerging planning policy, as well as supplementary guidance produced by the Council.
- 3.1.2 The statutory Development Plan for the area is the Monmouthshire County Council (MCC) Local Development Plan (LDP) 2011-2021 (adopted on 27 February 2014). Other material considerations include The Wellbeing of Future Generations (Wales) Act (2015), Planning Policy Wales (PPW), and various Technical Advice Notes (TANs) at the national level, as well as supplementary planning guidance (SPGs) produced by MCC.
- 3.1.3 The key planning policies of relevance to the determination of the application are outlined below. A detailed assessment of the accordance of the proposed development with these policies is provided in Section 4 of this Statement.

3.2 National Planning Policy

- 3.2.1 This section of the Planning Statement addresses the current national planning policy context in light of changes brought about by the Well-being of Future Generations (Wales) Act 2015, and its influence in terms of the current iteration of PPW.

Well-being of Future Generations (Wales) Act 2015

- 3.2.2 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires; *“public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”*. The Act sets out seven ‘well-being’ goals, which are as follows:

- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
- A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and

circumstances).

- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

3.2.3 Within the Act, sustainable development is defined as follows: *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”*. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

Planning Policy Wales (Edition 10, December 2018)

3.2.4 Planning Policy Wales Edition 10 – December 2018 (PPW 10) sets out the land use planning policies of the Welsh Government. The primary objective of the latest version of PPW is to ensure that the planning system contributes to the delivery of sustainable development and improves the social, economic, environmental and cultural wellbeing of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

3.2.5 Paragraph 2.12 of PPW 10 relates to its interaction with the Well-being and Future Generations (Wales) Act 2015:

“The planning system is a very important policy, decision making and delivery mechanism. It should seek to maximise delivery of outcomes against all aspects of well-being/sustainable development, thus seeking to maximise contributions towards all of the goals of the Well-being of Future Generations Act. This can be achieved by adopting a placemaking approach”.

3.2.6 PPW 10 sets out that in order to maximise well-being and the creation of sustainable places, the concept of ‘placemaking’ should be at the heart of the planning system. It is stated at Paragraph 2.8 that development proposals: *“must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential*

impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle”.

3.2.7 Paragraph 2.9 goes on to clarify that *“The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making”.*

3.2.8 PPW 10 defines placemaking as follows: *“Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area's potential to create high quality development and public spaces that promote people's prosperity, health, happiness, and well being in the widest sense.”*

3.2.9 The five-key National Sustainable Placemaking Outcomes are outlined at Figure 4 of PPW 10, which should be used to inform the assessment of development proposals. These are:

- Growing the economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities; and
- Maximising environmental protection and limiting environmental impact.

3.2.10 Paragraph 2.15 of PPW indicates that these outcomes provide a framework which contains those factors which are considered to be the optimal outcome of development plans and individual developments. Paragraph 2.20 clarifies that not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being. It is for developers and planning authorities to identify these opportunities and act upon them.

The Historic Environment

3.2.11 PPW provides the national planning policy framework for the consideration of the historic environment, supplemented by guidance contained in Technical Advice Note 24: The Historic Environment, and Cadw associated best practice guidance on the historic environment.

3.2.12 It is set out at Paragraph 6.1.6 of PPW that the Welsh Government's specific objectives for the historic environment include seeking to:

- safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved;
- preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous; and
- preserve the special interest of sites on the register of historic parks and gardens.

3.2.13 In regard to Listed Buildings, PPW states at Paragraph 6.1.10 that *“There should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of historic interest which it possesses”*.

3.2.14 In regard to Conservation Areas, PPW states at Paragraph 6.1.14 that *“There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings”*. Paragraph 6.1.16 goes on to state that *“Preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area’s character or appearance or leaves them unharmed”*.

3.2.15 In regard to Registered Parks and Gardens, PPW states at Paragraph 6.1.19 that *“The effect of a proposed development on a registered park or garden, or its setting, is a material consideration in the determination of planning applications”*.

Energy & Energy Efficiency

3.2.16 Paragraph 5.4.18 of PPW advises that *“Planning authorities should look favourably on any renewable and low carbon energy generation proposals”*.

3.2.17 PPW sets out that the Welsh Government is committed to delivering the outcomes set out in Energy Wales: A Low Carbon Transition, the priorities of which are:

- Reducing the amount of energy we use in Wales;
- Reducing our reliance on energy generated from fossil fuels; and
- Actively managing the transition to a low carbon economy (paragraph 5.74).

3.2.18 PPW states at Paragraph 5.8.1 that *“The planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of climate change, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures”*.

Green Infrastructure

3.2.19 The Environment (Wales) Act 2016 places a duty under Section 6 to maintain and enhance biodiversity and promote the resilience of ecosystems.

3.2.20 Paragraph 6.2.4 of PPW states that *“The planning system should protect and enhance green infrastructure assets and networks because of these multi-functional roles. The protection and enhancement of biodiversity must be carefully considered as part of green infrastructure provision alongside the need to meet society’s wider social and economic objectives and the needs of local communities”*.

3.2.21 With regard to the biodiversity and resilience of ecosystems duty under Section 6, Paragraph 6.4.5 of PPW 10 requires that *“Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any*

significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity”.

Draft Future Wales: National Development Framework

- 3.2.22 The consultation draft of the National Development Framework (NDF) was published in Summer 2019 with the intention of establishing the direction for development in Wales from 2020 to 2040 and was subject to a period of public consultation during Autumn 2019.
- 3.2.23 A “working draft” version of the NDF, with the revised title ‘Future Wales – The National Plan 2040’ was published in September 2020 to assist the Senedd Cymru – Welsh Parliament to scrutinise proposed changes resulting from the public and technical consultation. That scrutiny period was completed in November 2020.
- 3.2.24 It is anticipated the NDF will be officially published in February 2021 and until formally published, the NDF carries limited weight in planning decision-taking.
- 3.2.25 Of particular relevance to the proposals at Llanarth, the draft NDF states that ‘healthcare’ is one of the areas of the foundational economy which the planning system can support.

Technical Advice Notes (TANs)

- 3.2.26 Advice contained in the following TAN’s is also of relevance to the proposed development:
- TAN 12 (Design) (2016) provides advice in terms of seeking to achieve the objectives of good design. It sets out 5 key aspects of good design relating to character; community safety; environmental sustainability; access; and movement.
 - TAN 18 (Transport) (2007) indicates the need to reduce the need to travel and provide a greater choice of means of transport other than the private car (paragraph 3.1). The TAN advises accessibility is important in addressing social exclusion and for maximising choice in services, employment and recreation opportunities, remembering in most cases transport is a means to an end (paragraph 3.2).
 - TAN 5 (Nature Conservation and Planning) (2009) The document provides advice about how the land use planning system.
 - TAN 15 (Development and Flood Risk) (2004) sets out that new development should only be permitted within Flood Zones C1 and C2 if determined by the planning authority to be justified in that location. Where development is justified, an assessment must be undertaken to establish whether suitable mitigation measures can be incorporated.
 - TAN 24 (The Historic Environment) (2017) provides guidance on decision-making planning applications affecting the historic environment (including Conservation Areas and assets of special local interest). TAN 24 advises that a heritage impact statement must form part of any application for listed building consent and/or conservation area consent.

3.3 Monmouthshire Local Development Plan

3.3.1 The key planning policies of relevance to the proposed development as set out in the adopted MCC Local Development Plan (LDP) (adopted February 2014) are summarised below.

3.3.2 **Policy DES1 – General Design Considerations:** specifies that development should be of a high-quality sustainable design and respect the local character and distinctiveness of Monmouthshire's built, historic and natural environment. Development proposals are required to meet a number of criteria – of particular relevance to the proposals at Llanarth Hospital are the following:

c) respect the existing form, scale, siting, massing, materials and layout of its setting and any neighbouring quality buildings.

e) respect built and natural views and panoramas where they include historical features and / or attractive or distinctive built environment or landscape.

f) use building techniques, decoration, styles and lighting to enhance the appearance of the proposal having regard to texture, colour, pattern, durability and craftsmanship in the use of materials.

g) incorporate and, where possible enhance existing features that are of historical, visual or nature conservation value and use the vernacular tradition where appropriate.

3.3.3 **Policy HE1 – Development in Conservation Areas:** sets out that within Conservation Areas, development proposals should, where appropriate, have regard to the Conservation Area Appraisal for that area and will be permitted if they:

a) preserve or enhance the character or appearance of the area and its landscape setting;

b) have no serious adverse effect on significant views into and out of the Conservation Area;

c) have no serious adverse effect on significant vistas within the area and the general character and appearance of the street scene and roofscape;

d) use materials appropriate to their setting and context and which protect or enhance the character or appearance of the Conservation Area; and

e) pay special attention to the setting of the building and its open areas.

3.3.4 **Policy HE2 – Alterations to Unlisted Buildings in Conservation Areas:** advises that permission will be refused where proposals are unsympathetic to an existing building and /or detract from the overall character or appearance of the Conservation Area. Paragraph 6.5.20 of the LDP advises that *"In assessing proposals, regard should be had to the relevant Conservation Area Appraisals"*.

- 3.3.5 **Policy SD3 – Flood Risk:** sets out criteria which aim to divert development from where it would be at risk from river, ordinary watercourse, coastal, surface water flooding or where it would increase the risk of flooding or additional run off from development elsewhere.
- 3.3.6 **Policy SD4 – Sustainable Drainage:** sets out that development proposals will be expected to incorporate water management measures, including SUDS, to reduce surface water run-off and minimise its contribution to flood risk elsewhere.
- 3.3.7 **Policy SD2 – Sustainable Construction and Energy Efficiency:** specifies that all new development proposals will be required to incorporate efficient resource use during construction, operation and maintenance.
- 3.3.8 **Policy EP1 – Amenity and Environmental Protection:** sets out that development should have regard to the privacy, amenity and health of occupiers of neighbouring properties.
- 3.3.9 **Policy MV1 – Proposed Developments and Highway Considerations:** advises that all planning applications for developments which are likely to have a significant impact on trip generation and travel demand must, as appropriate, be accompanied by a Transport Assessment.
- 3.3.10 **Policy MV2 – Sustainable Transport Access:** sets out that the development of sites shall, dependent on their location, size and local need, include provision for and the integration of appropriate sustainable transport links, including public transport, walking and cycling.
- 3.3.11 **Policy NE1 – Nature Conservation and Development:** outlines that development proposals shall accord with nature conservation interests and will be expected to retain, and where appropriate enhance, existing semi-natural habitats, linear habitat features, other features of nature conservation interest and geological features and safeguard them during construction work, as well incorporate appropriate native vegetation in any landscaping or planting scheme.

3.4 Supplementary Planning Guidance

3.4.1 Consideration has been given to the content and guidance set out within the following Supplementary Planning Guidance (SPG) adopted by MCC:

- Llanarth Conservation Area Appraisal (2016) – discussed in further detail below
- Green Infrastructure (2015)
- Monmouthshire Parking Standards (2013)

Llanarth Conservation Area Appraisal

3.4.2 The Llanarth Conservation Area was designated on 12th January 1976. Within the Conservation Area, the Application Site is located in the ‘Llanarth Court Character Area’. The ‘Llanarth Court Character Area’ contains a number of historic and architecturally important buildings, with Llanarth Court, the Roman Catholic church of St Mary and St Michael, west entrance lodge, and northern gateway being statutorily listed. The Conservation Area Appraisal confirms that *“Llanarth Court, gardens, ornamental lake and chapel form an historic group of some considerable significance”, and goes on to state that “the 19th century stable block to the north-east of the*

house is also of importance; although late 20th century hospital buildings have compromised its setting and relationship to the main house. The west gate lodge, northern entrance gates, stone bridge over the lake and former tank house in the Great Oak Plantation all contribute to the special interest of the historic parkland”.

- 3.4.3 Building styles and building materials are diverse within this part of the Conservation Area. As exemplified within the Conservation Area Appraisal: *“The Neo-classical Llanarth Court is rendered with slate roofs. The Roman Catholic Chapel, white painted roughcast with slate roof. The gatehouse comprises polychrome stonework with bands of coursed brown stone between broader bands of crazed grey and pink rubblestone, with an ornate, banded French pavilion slate roof with fish-scale courses. The north drive gate piers are sandstone ashlar with rubblestone walling. Modern hospital buildings are rendered brick painted cream with natural slate roofs”.*
- 3.4.4 It is set out within the Conservation Area Appraisal that landscape setting is of high importance to the history and special character of the Conservation Area: *“The position of Llanarth Court, situated within gently rolling parkland against the backdrop of distant hills and mountains, was key to its picturesque aspirations and the development of its grounds in the 18th century. This landscape character still remains as one of the features of this estate based Conservation Area”.*
- 3.4.5 In accordance with TAN 24, a Heritage Impact Statement is submitted in support of the Planning Application, which should be referred to in regard to impact upon the Llanarth Conservation Area.

4. Material Considerations

4.1 Introduction

4.1.1 Section 38 (6) of the 2004 Planning and Compulsory Purchase Order Act states that planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.1.2 This section considers the principal planning and development matters arising from the proposed development, drawing on the adopted Development Plan and other material considerations.

4.1.3 The key planning considerations associated with the proposed development are as follows:

- Principle of Development
- Design Considerations & Impact on Sensitive Historic Setting
- Flood Risk & Drainage
- Ecology
- Highways/Transport Considerations

4.2 Principle of Development

4.2.1 The application is for a replacement hospital ward on an established hospital site, positioned (as far as possible) on the footprint of the former building. As described, the former building on the application site was subject to severe fire damage in April 2020, and the Applicant aims to replace the care provision lost as a result of the unavoidable demolition of the building. The principle of development of a replacement care provision at this location is therefore considered acceptable.

4.2.2 The reuse of the existing viable sub structure ensures that the majority of the proposed building is contained within the footprint of the former building. It is acknowledged, however, that the proposed development includes an increase in floorspace of 605 sqm. This increase is necessary due to the requirement to include 5 additional beds (providing 24 beds in total, across two 12-bed wards). Basic ward facility requirements and the minimum number of staff to operate a ward of any patient numbers in a viable way is 12 beds. The accommodation requirements for a modern medium secure facility also include a number of facilities which the Treowen Building previously didn't require due to the age of its design. These are outlined as follows:

- Provision of additional lounges, kitchens, dining room, staff offices, clinical areas and visitor facilities;
- Tribunal Suite;
- Additional Seclusion Suite (1 per ward);
- More prescriptive 'front of house' – to accommodate visitor facilities;
- Increase in plant space.

4.2.3 In addition, the Treowen Building had a very simple front of house. It was an air lock corridor, leading to a visiting room and then onto the ward itself. The current requirements for a medium secure facility are more stringently controlled from a security perspective, including a

reception/24hr security station with a secure airlock so that passage of patients, visitors and staff can be carefully managed and controlled. Beyond this point a family visiting area is proposed, with separate search rooms, and further airlocked access to wards, tribunal facilities, staff areas and therapies departments, to ensure that all areas remain secure.

4.2.4 The increase in floorspace is therefore required to allow for the provision of high quality and exemplar building to provide accommodation and associated facilities to the standard of prescribed by Care Inspectorate Wales.

4.2.5 As set out in Section 2.3 of this Statement, it is noted that planning permission was granted for the construction of two additional detached wards on the vacant land parcel to the south of the application site in 2009 (application ref. DC/2007/00746). Although this permission remains unimplemented, it serves to establish that development of extended healthcare facilities within the Llanarth Court hospital site is acceptable in principle.

4.2.6 In light of the above, it is considered acceptable that the minor increase in floorspace of 605 sqm as proposed at the replacement Treowen Building is acceptable (subject to detailed planning considerations as discussed below).

4.3 Design Considerations and Impact on Sensitive Historic Setting

4.3.1 The site is located within a historically sensitive location and a Heritage Impact Assessment has therefore been undertaken accordingly (cross reference should be made to the Heritage Impact Statement and Design and Access Statement submitted in support of the application). In summary, it has been established that the proposed development will result in:

- A neutral impact on the significance of the Conservation Area.
- A neutral impact on the significance of the Registered Llanarth Court Historic Park and Garden.
- A neutral impact on the significance of the Listed Buildings at the Llanarth Court Hospital Site (and no impact upon those Listed Buildings located within the Conservation Area but obscured from the Application Site in light of distance/screening).

4.3.2 By utilising the existing footprint of the former Treowen Building, the proposed development ensures that the new building will continue to sit comfortably within the general setting of Llanarth Court, where the grouping of buildings is effectively broken up by the use of varying orientations of buildings and intervening stands of trees. The site of the replacement building is screened by an existing dense band of trees along its southern boundary and by the existing Teilo Building along its western boundary, and the extension to the built footprint is located to rear of the building within the least visually prominent area of the site. The site is therefore positioned within a discrete area of the Llanarth Court Hospital site. It is considered that in light of the building's

positioning the proposed development will preserve the character and appearance of the Conservation Area and its landscape setting in accordance with Policy HE1 of the LDP.

- 4.3.3 Criteria (d) of LDP Policy HE1 requires the use of materials “*appropriate to their setting and context and which protect or enhance the character or appearance of the Conservation Area*”. As set out within the Conservation Area Appraisal “*Building styles and building materials are diverse within this part of the Conservation Area*” and include “*modern hospital buildings*”. The high standard of building design as proposed by this application will ensure no adverse impact on the Conservation Area and will in fact serve as an enhancement in comparison to the functional, yet relatively plain aspect of the former Treowen building. As set out within the Design and Access Statement, due to the eclectic mix of buildings on the wider Llanarth Court site (age, scale, materiality), the design driver for the form and materiality of the proposed building is to provide a contemporary aesthetic which addresses its context through the use of a limited palette of high quality materials, which reference, where appropriate the existing built environment.
- 4.3.4 It is considered that the replacement building will not intrude unacceptably upon the historic buildings of Llanarth Court. The building will not be readily apparent from the sensitive historic parts of the hospital site i.e. the listed buildings including Llanarth Court itself and the Church of St Mary and St Michael (and certainly not from those located further from the application site, such as the gatehouse or gates and piers to the north drive). The former Treowen Building, and other modern outlying hospital buildings, have been accepted by both Monmouthshire County Council (Planning and Conservation Officers) and by Cadw to form acceptable features at the hospital site, which has a history of development, and which would not harm the listed buildings at Llanarth Court, or indeed the character and setting of the Registered Historic Park and Garden within which the site lies. This is also the case for an application for two further detached wards on land to the south of the Treowen Building, which was granted planning permission in 2009. It is maintained that the proposed replacement building, through its sensitive design and siting, will not harm the listed buildings at Llanarth Court or have any adverse impact upon their setting.
- 4.3.5 In terms of impact on residential amenity, the hospital site stands apart from other residential buildings within the village of Llanarth and surrounding hamlets. The proposed replacement building will not intrude on or otherwise harm the privacy and amenities of those living within the surrounding area.
- 4.3.6 In accordance with LDP Policies DES1, HE1 and HE2, as well as the Llanarth Conservation Area Appraisal, the character and setting of both the Conservation Area and Registered Historic Park, as well as the setting of adjacent Listed Buildings will be protected by the proposed development.

4.4 Transport / Parking

- 4.4.1 A Transport Statement has been prepared by Tetra Tech on behalf of the Applicant and is submitted in support of the Planning Application.
- 4.4.2 The Transport Statement forecasts an additional 2 vehicle trips in the AM peak period and 1 vehicle trip in the PM peak period as a result of the proposed development. In summary, it has

been established that an increase of 5-beds on the hospital site as proposed by the application will have an immaterial impact on the local highway network.

4.4.3 In regard to car parking, the Monmouthshire Parking Standards SPG (2013) specifies that for a hospital use, a provision of 2.5 spaces per bed is required. However, this level of provision would be typical for a standard urban-type hospital. The SPG includes a note that for other types of hospital, a lower level of provision may be acceptable. Given the location of the Llanarth Court Hospital site, and the nature of care provision, it is considered appropriate to provide a lower level of provision.

4.4.4 Car parking is provided on a site-wide basis. For the existing site (including the former Treowen building) the current parking provision is 1.77 spaces per bed, as illustrated below:

Current number of parking spaces	203
Current number of beds (incl. former Treowen)	115
Extant parking ratio	1.77

4.4.5 For the proposed development (incorporating an increase of 5-bed spaces) the site-wide parking provision reduces slightly to 1.69 spaces per bed, as illustrated below:

Proposed number of parking spaces	203
Proposed number of beds	120
Proposed parking ratio	1.69

4.4.6 The loss of 0.08 spaces per bed is a very minor reduction in parking ratio. Given this very minor reduction in parking ratio, and the immaterial additional vehicle trip generation, it is considered appropriate to provide no additional car parking spaces, further justified by the fact that the site has no existing parking constraints and is served by a considerable amount of informal parking areas in addition to the 203 formal parking bays.

4.4.7 In summary, the Transport Statement, concludes that there are no significant transport impacts associated with the proposed development of the site with the residual cumulative impacts of the development are not severe

4.4.8 In accordance with LDP Policy MV1 and MV2, the proposals will ensure no adverse impact on the highway network and will provide a sufficient level of car and cycle parking spaces.

4.5 Flood Risk & Drainage

4.5.1 The site of the replacement building itself is not located within a Flood Risk Zone. However, parts of the surrounding hospital estate, including the vehicular access road to the application site, are located within Flood Zone C2. As such, a Flood Consequences Assessment (FCA) has been prepared by Tetra Tech and is submitted in support of the Planning Application accordingly.

4.5.2 The FCA identifies that the actual proposed development footprint falls within Zone B, with access road extending south westwards through Zone C2. The FCA finds that the development and associated access is located beyond the 0.1% AEP pluvial and fluvial floodplains, and that there

is no tidal or reservoir flood risk impacting the site. The proposal satisfies the TAN15 suggested tolerable conditions for extreme flood events. Whilst predicted flood depths for the surrounding lands exceed the TAN15 suggested tolerable conditions for the 0.1% flood events, the alteration of ground levels outside the development footprint is beyond the control of the client. Comparison of access route levels with the estimated NRW 0.1% AEP flood level of c.36.40m AOD indicates that flood free access can be obtained to the south west via the site's existing access.

4.5.3 A Drainage Strategy is submitted in support of the Planning Application, which demonstrates that the proposed development will incorporate sustainable drainage in accordance with statutory SuDs standards for surface water as required by Schedule 3 of the Flood and Water Management Act 2010 (see Drainage Strategy Report and Preliminary Drainage Layout prepared by MDA). A separate SAB Application will be submitted, to run concurrent with the Planning Application. As set out within the Drainage Strategy Report, the drainage networks have been designed to suit the proposed site layout and topography, with the aim to provide an effective and efficient design, mimicking the existing drainage as far as practicably possible. The scheme will incorporate a new attenuation pond located at the south west corner of the development area, with the outfall connected into the existing French drain and to the existing brook. All site drainage will remain the responsibility of the Hospital Trust as it will form an extension of the current on-site drainage systems.

4.5.4 Notwithstanding the flood risk designation of the land surrounding the application site (including part of the access road), flooding is not considered to represent a fundamental constraint to development and can be appropriately managed, in accordance with Policy SD3 and SD4 of the LDP.

4.6 Ecology

4.6.1 A Preliminary Ecological Assessment has been carried by Tetra Tech and an Ecological Appraisal Report is submitted in support of the Planning Application.

4.6.2 The key findings of the Preliminary Ecological Appraisal in regard to protected and notable species, including recommendations, are summarised below:

- Great Crested Newts (GCN): four ditches were identified within 250m of the site and suitable foraging/ refuge habitat is present on site. Habitat Suitability Index (HIS) results of the four ditches show below average suitability for D1 and D3, poor suitability for D2 and average suitability for D4 (refer to Figure 1 of the Preliminary Ecological Appraisal Report for location of ditches 1-4). Therefore, since it cannot be ruled out that GCN are present within these water features and potentially within the development footprint, it is recommended that further surveys are undertaken on D1, D3 and D4 to confirm presence / likely absence of GCN.
- Reptiles: given the development footprint will be similar to the former razed building and the remaining habitats will be retained and enhanced it is recommended that precautionary avoidance measures are carried out. Habitat manipulation and reptile

displacement should be carried out for the clearance of any vegetation within the works area to reduce its potential for impacting wildlife.

- Bats: given that the site itself offers limited opportunities for bats, bat activity surveys are not considered necessary. However, the landscaping should include structurally diverse vegetation and inclusion of evening-blooming plants that will attract insects, which in turn will help to enhance the site for bats.
- Badger: although no evidence of badger was recorded on site, the site was considered to offer some suitable foraging habitat for badger and the surrounding habitats offer opportunities for sett building and foraging. As a precaution, a pre-commencement check of the site, plus a 50m buffer, is recommended at least three months prior to works, to confirm the continued absence of badgers from the site.
- Otter: SEWBRc provided one record for otter within 2km of the site located 1.7km south of the site approximately 150m from Clawdd Brook. Clawdd Brook runs 30m south of the site and offers suitable habitat for otter. No signs of otter were recorded on site along the stretch of brook adjacent to the site. Given that the brook is 30m from the proposed works footprint and the watercourse will not be directly affected by the development no further survey is considered necessary.
- Water vole: the closest record for water vole provided by SEWBRc is 2.2km south-west of the site. Although, the site itself offers limited suitable habitat for water voles the ditch and earth bank immediately east of the site offer some potential foraging and refuge habitat, albeit sub-optimal. Therefore, it is recommended that a check for signs of water vole is carried out.
- Polecat: due to the potential presence of polecat, which have been recorded in the wider area, it is recommended appropriate precautionary working measures are included as part of the construction phase.
- Hedgehog: due to the potential presence of hedgehog, which have been recorded in the wider area, it is recommended appropriate precaution working measures.

4.6.3 An eDNA survey of D1, D3 and D4 will be undertaken in April to confirm presence / likely absence of GCN, as recommended within the Preliminary Ecological Appraisal Report. In light of the sub-optimal nature of these water bodies, the potential for GCN is considered to be low.

4.6.4 The Preliminary Ecological Appraisal provides the following recommendations with regard to ecological enhancements:

- Birds: to provide habitat for breeding birds, bird boxes are recommended to be provided.
- Bats: to provide an enhancement for roosting bats, bat boxes are recommended to be installed on (or in) the new building or on trees in the adjacent woodland.
- Habitats: where new landscaping is proposed on site, this should incorporate locally sourced, nursery grown, native stock, in keeping with the existing local habitats to provide a variety of valuable habitats for wildlife. Structurally diverse vegetation and inclusion of evening-blooming plants will attract insects which in turn will help to enhance

the site for wildlife.

- 4.6.5 In accordance with LDP Policy NE1, the proposal will have no adverse impact on any protected habitats or species and will look to enhance nature conservation interests as far as possible.

5. Conclusions

5.1.1 The proposed construction of a replacement building at the site of the former Treowen Building at Llanarth Court Hospital to accommodate two 12-bed long-stay wards (to replace the care provision lost as a result of the unavoidable demolition of the former fire-damaged building), has been formulated having regard to the provisions of the MCC LDP and SPG (including the Llanarth Conservation Area Appraisal), as well as other material considerations outlined in prevailing Welsh Government policy/guidance.

5.1.2 The development is considered to be both appropriate and acceptable, as summarised below:

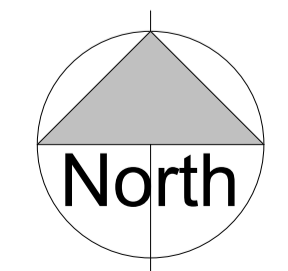
- The application is for a replacement hospital ward on an established hospital site, positioned (as far as possible) on the footprint of the former building – the principle of replacement care provision at this location is considered acceptable.
- The proposed replacement building primarily utilises the footprint of the former building, whilst accommodating a small extension in floorspace – amounting to an additional 605 sqm. This modest increase in floorspace is acceptable in light of the requirement to meet up-to-date regulatory requirement in health care provision.
- By utilising the existing footprint of the former Treowen Building, the proposed development ensures that the new building will continue to sit comfortably within the general setting of Llanarth Court, where the grouping of buildings is effectively broken up by the use of varying orientations of buildings and intervening stands of trees. The site of the replacement building is screened by an existing dense band of trees along its southern boundary and by the existing Teilo Building along its western boundary, and the extension to the built footprint is located to rear of the building within the least visually prominent area of the site. The site is therefore positioned within a discrete area of the Llanarth Court Hospital site. It is considered that in light of the building's positioning the proposed development will preserve the character and appearance of the Conservation Area and its landscape setting.
- The former Treowen Building, and other modern outlying hospital buildings, including the larger Teilo ward to the west of the site, have been accepted by both Monmouthshire County Council (Planning and Conservation Officers) and by Cadw to form acceptable features at the hospital site, which has a history of development, and which would not harm the listed buildings at Llanarth Court, or indeed the character and setting of the Registered Historic Park and Garden within which the site lies.
- It is considered that the replacement building will not intrude unacceptably upon the historic buildings of Llanarth Court. The building will not be readily apparent from the sensitive historic parts of the hospital site i.e. the listed buildings including Llanarth Court itself and the Church of St Mary and St Michael (and certainly not from those located

further from the application site, such as the gatehouse or gates and piers to the north drive).

- The Heritage Impact Assessment confirms that the character and setting of both the Conservation Area and Registered Historic Park, as well as the setting of adjacent Listed Buildings will be protected by the proposed development.
- The proposals will have no adverse impact on the highway network and will continue to provide a sufficient level of car parking spaces as appropriate to the location of the site and the nature of the hospital care.
- Notwithstanding the flood risk designation which applies to part of the site access road, flooding is not considered to represent a fundamental constraint to development and can be appropriately managed.
- A Drainage Strategy is submitted in support of the Planning Application, which demonstrates that the proposed development will incorporate sustainable drainage in accordance with statutory SuDs standards for surface water.
- The proposal will have no adverse impact on any protected habitats or species, subject to recommendations set out in the Preliminary Ecological Appraisal Report.

5.1.3 Having regard to the above material considerations, it is considered that the proposed development represents an appropriate and policy compliant scheme. Accordingly, we would respectfully request that the application is approved.

Appendix 1 Proposed Site Plan



Client: Priority Group
 Project: Proposed 2x12 Bed MSU, Llanarth Hospital
 Job No.: 1157
 Date: 17/12/20
 BIM Model: PLHT-10A-M3-001
 QA: KL, SW
 Scale: 1:200@A1
 Drawing: Proposed Site Plan
 Rev notes: Issue for Planning Pre-Application

PLHT-10A-V1-00-DR-A-0003-P1

10 ARCHITECT
 | (Architect: unit 16, 12 Allen Road, Manchester, M14 6JF)

Appendix 2 Proposed Layout & Schedule of Accommodation

