

Rhodri Davies,
Planning Officer
Brecon Beacons National Park Authority
Plas y Ffynnon
Cambrian Way
Brecon
Powys
LD3 7HP

Date: 22 May 2012

Dear Mr Davies,

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

Planning Application 12/07690/CAC & 12/07922/FUL

Mixed use redevelopment of the site for housing, employment and community uses including 76 number residential units (C3), 5 live work units (B1/C3) and 18 number 1-2 bed retirement apartments (C3), Care/health facility (up to 70 bed apartments) (C2/D1), **conversion of the front 'Admin Block' into 4 apartments (C3), conversion of retained chapel into multi-use community building (D2) and offices (B1), conversion of retained mortuary into office space (B1)**, internal roads and paths, new allotments, creation of new cricket pavilion, access road, car park and tennis courts, landscaping and public open space, sustainable drainage systems, **de-construction (demolition) of the existing former ward buildings and associated works, services and utilities**

1. Objection

I am writing to object to the above applications, which propose to demolish most of the buildings at the former Mid Wales Hospital site near Talgarth and then replace the former buildings with 103 newly built housing units. This site, an important complex of late C19 and early C20 purpose-built structures set in a high quality landscape, was included within the Talgarth Conservation Area in 2011. I have examined the applicant's planning submission and the primary reason for objection is that the proposals **do not conserve or enhance the character of the Conservation Area. In addition to this there are missing plans and no structural surveys.**

2. Key Legislation

2.1 As I understand it, the key legislation relating to this application is **Section 69 of The Planning – Listed Buildings and Conservation Areas Act 1990**. The section on Conservation Areas at Section 72.2 says: -

“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

2.2 The Welsh Office Circular 61/96 **Planning and the Historic Environment: Historic Buildings and Conservation Areas** under Part Two: **Conservation Areas** dated 5th December 1996 provides further clarification and states at Para 20: -

Quality of place should be the prime consideration in identifying conservation areas.

This depends on more than individual buildings. It is recognised that the special character of a place may derive from many factors, including: the grouping of buildings; their scale and relationship with outdoor spaces; the network of routes and nodal spaces; the mix and relative importance of focus and background buildings; vistas and visual compositions; hierarchies of public and private space; materials used in buildings and other surfaces (pavements, roads, garden walls, railings.); architectural detailing (of windows, doors, eaves, gates, kerbs,...); patterns of use; colours; hard and soft landscaping; street furniture; and so on. Conservation area designation should be seen as the prime means of recognising, protecting and enhancing the identity of places with special character; local conservation policy should be sensitive to quality of place (townscape) in the broadest sense. Authorities should seek to establish consistent criteria against which they should periodically review existing conservation areas and their boundaries. Cancellation of designation should be considered where an area or part of an area is no longer considered to possess the special interest which led to its designation.

2.3 The National Parks statutory purposes and aims say: -

- i) *to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park;*
- ii) *to promote the understanding and enjoyment by the public of the special qualities of the Park;*
- iii) *to foster the social and economic well-being of the communities within the Park;*
- iv) *to ensure that all development within the Park has regard to the concepts of sustainability.*

4 Key National and Local Planning Documents, Policies, and Planning Briefs

1997 Mid Wales Hospital Planning Brief (MWHPB)

1999 Local Plan

Unitary Development Plan 2007 (UDP)

Talgarth Development Brief 2008 (TDB)

Local Development Plan (LDP)

Management Plan 2010 (MP)

Talgarth Conservation Area Appraisal December 2010 (TCAA)

Planning Policy Wales February 2011 (PPW)

PPW Tan 12. Design and Access

4.1 The Applications. 12/07690/CAC & 12/07922/FUL

I understand the applications were received on February 14th 2012 and were then validated and sent out for the three-week statutory public consultations on April 25th. This consultation period then started again on May 4th as it was found that essential plan and elevation drawings of the 75 new houses were missing from the public and online files.

On further examination of the submitted plans it appears there are more floor plans, side elevations and site sections missing including no drawings of the buildings the developer proposes to demolish and no structural surveys of them. Some of these buildings remain in

good order with slates on and others have only been removed in the last 6 months. In addition to this the developer's agents fully admit that their Building Conditions Survey was only a surface and visual record. Therefore a sound case for demolition has not been made.

4.2 I believe, and stand to be corrected, that these missing documents are a statutory requirement and are among the minimum requirements for Validation that comes under the Town and Country Planning (General Development Procedure) Order 1995. (as amended). However, I think the most important issue at this stage is for these essential drawings/plans and structural surveys to be placed on public file.

Without these records it is not possible to make a true evaluation of these buildings both in conservation and architectural design terms. We need to know what should remain and what might need to be demolished. Then we need to look at the architectural design of the whole scheme of new buildings set against old, to see what best befits the site in terms of reflecting its history and respecting its conservation status.

4.4 The BBNPA Validation Requirements state: -

Any proposal to demolish a building within the Conservation Area will need to be accompanied by a structural survey and a detailed justification of the proposed demolition together with an assessment of the impact of the demolition on the special character of the area

4.5 The above requirement is emphasized in the following UDP policies.

Policy Q 17: (Development affecting Conservation Areas)

New development and alterations to existing buildings within or affecting the setting of a Conservation Area will only be permitted where it will preserve or enhance the character of the area and where the design, all building materials, proportions and detailing are appropriate to the Conservation Area.

4.6 **Policy Q18:** (Demolition in Conservation Areas)

The demolition or substantial demolition of any unlisted building or structure within a Conservation Area that is subject to Conservation Area consent will only be permitted where there is the strongest justification. Where such a building is to be replaced, a contract of redevelopment will be required to be finalised and entered into prior to the granting of conservation area consent.

5. Definition of the Special Character of the Talgarth Mid-Wales Hospital Site

3.1 This is to be found in the adopted 2010 BBNPA conservation report prepared by John Wykes Conservation and Planning. It is titled the **Talgarth Conservation Area Appraisal** and within it is a clear description and detailed assessment of the nature and character of the Mid-Wales Hospital site. I will include here the parts concerning the hospital in its entirety for ease of reference.

5.2 The Mid-Wales Hospital Site

10.3 *Wern Fawr an older farmhouse is sited to the north of (the later named) Hospital Road. The farm became the home farm of the hospital and there are other uses linked to it, notably staff houses or "villas" along the southern access road to Talgarth and to Pwll-y-Wrach and a large, detached house, Chance Field, to the north of the main complex.*

The complex of hospital buildings, main entrance block, Great Hall, separate chapel, mortuary, boiler house and laundry and other specialised treatment facilities was

originally designed by **Giles, Gough and Trollope in 1900**. The hospital buildings are laid out in a symmetrical “butterfly” plan, with a series of pavilions positioned either side of the central entrance and hall blocks, linked by corridors. There are various modern extensions and buildings but, in the main, the site retains a strong early C20 character.

10.4 Wern Fawr appears to be a five bay house, possibly incorporating an attached barn. It is roughcast and has had its first floor windows heightened into partial dormer windows. The nearby home farm buildings have a very distinctive architectural vocabulary, with local purple-brown sandstone rubble, laid to courses and with a yellow brick trim of quoins and window and door heads. Windows and doors have cambered arch heads. The original hospital buildings are two and single storey, with the main entrance block having a real architectural presence, with an E-plan, ten bays, a projecting two bay centre with porch, topped by a decorative clock turret and ground floor canted bays in the outer bays. The style is a typical late C19-early C20 modified classical, with sash windows, and vernacular C17 elements in the central gable. The materials are coursed sandstone rubble, pink sandstone used for dressings and slate roofs.

10.5 There are also single storey ancillary buildings, in similar materials, with hipped roofs and distinctive multi-paned iron windows with the glazing bar joints expressed by small rosettes. The mortuary is also single storey, but with wooden sash windows. The boiler room chimney is prominent, of tapering square section and with iron reinforcement banding. The chapel is a seven bay rectangle, of sandstone and slate, in a simple lancet style and topped by a louvred cupola.

There is a group of rendered buildings to the east of the main block, with sash windows. The large detached house, Chance Field, to the NW of the chapel, has many attractive Arts and Crafts/Queen Anne-style details – roughcast, multi-pane sashes, a large casement marking the staircase, canted bays and a central porch complete with segmentally arched head.

10.6 The complex is set in a very attractive landscape, with mature coniferous and deciduous trees, in the area around the chapel and Chance Field, by the southern entrance and along the two approach roads. There is a tennis court and a cricket field, complete with a pavilion, to the west of Chance Field.

10.7 The hospital buildings have been unused since the late 1990s, apart from some commercial use of a few units to the east of the main complex. There has been systematic stripping of slates and lead, resulting in damage to the former main hall. There have been attempts to list some or the entire group, but these have been, to date, unsuccessful. A range of uses for the site has been discussed with the private owners but apart from the limited commercial use and the successful conversion of the Waun Fawr buildings for residential and tourism accommodation uses, the main complex is in obvious danger of further damage and, potentially, loss.

10.8. **The financial realities of mixed use development, access considerations and the requirements of the planning system will undoubtedly determine the future of the site but there is a need to secure the remaining buildings and to ensure that any development is of the highest standard, respecting the handsome buildings and their setting in an attractive landscape. It is conceivable that some or all of the original hospital buildings should be listed, on the basis of the quality of buildings like the main entrance block and the chapel and as recognition of the historic building use and layout.**

This kind of mental/isolation hospital complex is a very characteristic late C19-early C20 development, providing a reasonably humane environment and facilities for sport and rehabilitation. In the last twenty years, many similar sites have been demolished or altered beyond recognition as the NHS has disposed of much of its estate. Whilst listing may be reconsidered, it is desirable to provide some sort of increased protection of the buildings and landscape and to inform future planning decisions. “

6 Site Character Synopses

I have attempted to distil the above conservation area appraisal to a few key points: -

- *The character of the complex is predominantly 19th /20th century.*
- *The layout of the site is the up-to-date “Butterfly” Plan or echelon layout.*
- *The scale of the buildings is no greater than two storeys.*
- *The building style is modified classical with some 17th century vernacular.*
- *The materials used are coursed sandstone rubble, pink sandstone used for dressings and slate roofs.*
- *The landscaping is attractive, reflects the rural location and affords open views.*
- *The report also states that the site may be worthy of listing: -*

Approaches have been made to SAVE, Cadw and the Welsh Assembly Petitions Committee in order to explore whether the site is of quality worthy of listing. Further research is being carried out to assess Talgarth's relative importance both with regard to development of Asylum Architecture and in the context of surviving examples of this type of architecture. English Heritage recently produced a Listed Selection Guide: Health and Welfare Buildings, April 2011. This contains a useful section on p9 about Asylums (See Appendix 1). The description of the echelon plan is remarkably consistent with that in Talgarth. **It may well transpire that Brecon Beacons National Park Authority has not fully appreciated the relative uniqueness and survival of an architectural gem on its doorstep.**

7. The Developer’s Submission

It was with great disappointment that I first saw and then read in full the present submission by the developers. There are a number of issues that could be raised; not least the developer's submission with regard to the authority’s Validation Requirements. There are no floor plans or elevation drawings of the hospital wards, Great Hall, court yards and wings, all of which the developer proposes to demolish representing approximately 98 % of the built area of the 3 hectare site. Then the developer proposes to level and cover over of the exceptional butterfly footprint of the whole complex. It is an exceptional design, which has an organic and ordered flow of inner and outer spaces. This is of particular concern, but I will largely limit myself in this letter to a detailed analysis of those aspects directly affecting the Conservation Area status of the site as outlined in the following two documents prepared on behalf of Collins Developments for the redevelopment of the site. Also for clarification purposes of I have titled some of the following items with my character synopsis phrases listed above in paragraph 6. for context and contrast purposes.

7.1 The Developer's Conservation Area Assessment Survey (February 2012) and Building Condition Survey November 2011 (5a 2.4) states: -

a) Demolition and the developer’s Building Condition Survey.

In 2.4 of the Developer’s Building Condition Survey it states:

“It is important to note that the Building Condition Survey and report does not

constitute a full Acquisition type Survey commonly referred to as a 'Structural Survey' and there has been no attempt made to trace the cause of all the defects beyond the obvious visual observation or to attempt any reassessment of the structural integrity of the buildings"

The Developer's Conservation Area Assessment Survey states: -

- 5.4 *The Building Condition Survey demonstrates that it is not practical or financially viable to retain the existing buildings for either their current or a future use. That said, it is proposed to retain the key buildings within the former hospital grounds, which provide the defining valuable characteristics of the site, namely the Chapel, former Administrative building and the mortuary.*
- 6.5 *However, the proposed development, through its respect of the local character and in particular the reuse of the stone from the existing buildings provides a piece of townscape that will be unmistakably Talgarth." (Note: not related to the site itself)*

b) Layout. The layout of the site is the up-to-date "Butterfly" Plan or echelon layout.

- "5.8 The design of layout of the proposed development has taken typical plots and forms from within Talgarth and the surrounding villages to determine a typology of properties, in the form of a typical terrace, a land mark building; properties turning corners and detached properties. The analysis has identified the range of boundary treatments appropriate to each form" (note: not related to the site itself)*
- 5.9 *In accordance with the design guidance outlined in Section 4 from the Conservation Area appraisal, the layout has been prepared to define spaces, using built development to define those spaces. The objective has been to provide a piece of townscape that is typically Talgarth / Mid Wales in its form, whilst recognising its relationship to the sensitive landscape within which it is located.*
- 5.13 *The proposed development has been contained within the existing footprint, so As to limit the quantum of development, but also to provide an acknowledgement of the sites former use. (Note: it has been contained within the foot print area, but hasn't conformed to the footprints)*
- 5.14 *Whilst it has not been considered appropriate to replicate the butterfly layout of the former hospital buildings, the layout of the development, in providing a sequence of spaces and streets offers an acknowledgment and recognition of the former layout, for example the provision of the main street, the village green around the chapel." (Note: layout not related to the echelon butterfly plan)*

c) Scale: The scale of the buildings is no greater than two storeys.

- 5.15 *However, the proposed development offers a less formal arrangement of buildings, respective of Talgarth, the landscape setting and a scale of development more appropriate to this setting.*

Mass / Scale / Outline

- 5.19 *The height of the proposed development is typically 2 storey, with the use of 3 storey to the Care Facility and the landmark / focal buildings.*

5.20 The proportions of the buildings and their openings follow traditional sizes, typically found in Talgarth. As outlined in the Design & Access Statement, many of the buildings within the locality have simple elevations with informality. Whilst some therefore offer a symmetrical form, others do not, often with windows being of unequal size and not lined up, but reflecting

the purpose by which the rooms are used. This variety and pattern has therefore been adopted in the proposed development.

5.21 The outline / roofline proposed is varied, offering variety in height and form, but within parameters defined by the pitch of roofs, overall height and character. Typically roof ridges are gabled or hipped and are parallel to the street, with occasional variations to add interest. “

d) Building Style: The building style is modified classical with some 17th century vernacular.

“Windows & Doors

5.24 These will normally be of timber construction, with some reflecting traditional types with glazing bar patterns or sashes. However, in order to avoid the townscape appearing as a mere pastiche, others will be of a more modern form and character.

Porches / Canopies

5.25 As with the above, these will reflect the traditional form, scale and mass found in Talgarth. However, these may not all be an entirely traditional form, including potentially more modern styles.

Colour

5.26 Render will be white / off white or grey; painted timber will be white or of modern conservation colours.”grey.”

e) Materials: The materials used are coursed sandstone rubble, pink sandstone used for dressings and slate roofs

5.22 As much of the sandstone from the existing buildings is to be reused as possible, which will be used for facing buildings, providing details to elevations (quoins and lintels) and for boundary treatments, typically walls.

5.23 As per the Conservation Area appraisal, elsewhere, the use of render is commonplace, in a white, off -white or a grey stone colour. Chimneys will be of brick or render, but may act as a more modern insertion into the built form.

f) Landscaping: The landscaping is attractive, reflects the rural location and affords open views

5.28 Landscape planting is provided to front gardens and to the spaces created. For example, the village green area is characterized by its openness, the boundary trees and the occasional ornamental species. However, the streets have included native tree species to add character provide shelter as well as a relationship to the surrounding landscape.

5.29 Within the incidental spaces, trees are again utilized to add character and a quality of space. Within the rural edge and to offer ecological benefits, additional planting is provided as out lined on the landscape proposals. (Note: The incidental spaces bare no relation in mass or open areas at the centre of the butterfly pattern)

8. Anomalies

On closer examination of the Developer’s statements on Design and Access, Conservation, the BBNPA’s Validation Requirements and policies there are clearly gaps, numerous anomalies

and conflicting statements which are too long to list. However I will highlight a few: -

8.1 The Developers Design and Access Statement 10.1 states: -

Further detailed changes have occurred since the public consultation event and the final pre- application meeting with the BBNPA in December.

This is true. There have been many changes, since the brief one afternoon and evening consultation with the developer, which the public have not been privy too. The main alterations have been in layout and design, which now have little relation to the present scheme.

8.2

Buildings along the High street followed strictly the line of the existing buildings and those immediately next to the existing administration building were set back to allow for better views of the administration building'

This is not the case at all. If you observe Plan NP5v1 and the original footprint plan of the existing wards (NP4v1) you will see the buildings next to the Administration building have not been 'set back'. You will also notice that the proposed footprints of the adjacent buildings have moved closer to the Administration building. In addition to this all the existing single storey and lower buildings next to the Administration building are being replaced by three story buildings which are the same height, and in the case of the proposed retirement flat block, much higher. Likewise as stated in 6.c above concerning the Developers' Conservation Statements on "Scale", it must be remembered that there are no 3-storey buildings on the existing site. It is the Developers proposal, which is turning single, and two storey buildings into three. This is by no means an enhancement for this very fine Administration Building, or the whole site, which was designed, by Giles, Gough and Trollope in 1900. This is also an encroachment on the height of the Chapel opposite.

8.3 Apart from one plan drawing, NP5v1, there appears to be no other drawings that meet requirements. In particular there is a complete absence of any plan drawings and elevations of the existing echelon wards, the Great Hall, Wards 7&8 and how they will relate to the new proposals and adjacent buildings. There are also no drawings of the existing floor areas and side elevation details. There is only one site section drawing for the whole 3-hectare site of 103 proposed dwellings. Appendix 2 contains copy of the Validation Requirements.

9 Conclusions

- It is clear from the edited highlights listed above the Developer has missed the point.
- In truth, there is not enough information for anyone to make a proper evaluation of this application. What has been submitted is barely more than outline planning. No attempt has been made to preserve and enhance the character of the Mid-Wales hospital site. The developers are proposing to demolish most of the buildings and re-use material. This is not preservation.
- With regard to the design proposals, the developers freely admit that they have taken their reference as being the wider environs of Talgarth. The particularly characteristic echelon footprint plan of the Hospital site is not respected and neither have the proportions of windows, walls, eaves and pitches informed the designs. Appendix 1 states, "In an echelon-plan asylum the different classes of patients were housed in

pavilions, simulating domestic villas, arranged off a single-storey corridor laid out in a V or arrow head shape. These had unobstructed views of the surrounding countryside” This has not been echoed in the submission.

- There are far more buildings proposed at a greater density and with no feel for the landscape or the setting. Three storey buildings are proposed which do not currently exist. These will dwarf the existing buildings and in no way enhance the conservation area.
- The design and proposed materials are not in harmony with the current buildings. The developers say they are seeking to avoid pastiche but what they are offering in its place can hardly be described as imaginative, innovative or good modern design.
- Design / Development Brief
6.10 of the Local Plan 1999 and **Policy EM3** states there should be a design brief for the redevelopment of this site. Also the **2008 Talgarth Development Brief** (adopted) supports this approach in 6.3 & C (v)
- Therefore, in the absence of detailed and required plans, showing sensitivity towards this historic site, it would now seem an appropriate time to put the above policy and guidance into action. This could ensure a plan that respects and enhances this special site and landscape. It would be a sad irony if a proposed twenty first century housing development could not even manage to achieve the same level of humane scale in layout and design thought appropriate, one hundred years ago, for the humble inhabitants of a mental asylum.

I look forward to your acknowledgement and a conformation as to when the above missing plans and structural surveys might be viewed and made available to the public. There are also a number of other matters I would like to raise about these applications and I would like to reserve the opportunity of making further comment. I would be grateful if you could provide me with a deadline.

Yours sincerely

Niel Bally

PS. I would like to waive my rights to protection under the Data Protection Act and give you full permission to publish this letter, with my details, on your online planning files.

CC.

John Cook CEO

BBNPA Chairman

Rhiannon Edwards

Chair of Audit and Scrutiny

Roger Williams MP

Kirsty Williams AM

William Powell AM

Cadw

Marcus Binney CBE (SAVE)

Princes Trust

John Wykes

Rosie Burton

OVERLEAF: APPENDICES

Appendix 1

Section on Asylums page 9-10 from English Heritage's Listed Selection Guide: Health and Welfare Buildings, April 2011.

The Lunatic Asylums Act of 1845 made the erection of a pauper lunatic asylum compulsory in each county. Twenty-two had been built between 1808 and 1845; 63 followed between 1845 and 1888. All asylums were required to have chapels. Early experiments using detached houses with small-enclosed gardens found no followers until the later nineteenth century. The 'corridor plan' with small secure rooms was generally adopted and remained standard. Variations on this theme included radial and double-cross plans. Most of the later asylums were built on an echelon plan and this (as Elaborated at Claybury Asylum, Chigwell, Essex, by G.T. Hine of Nottingham, 1889; listed Grade II) became the standard model. In an echelon-plan asylum the different classes of patients were housed in pavilions, simulating domestic villas, arranged off a single-storey corridor laid out in a V or arrowhead shape. These had unobstructed views of the surrounding countryside (asylums increasingly were in rural locations). Together with the ancillary buildings – administration block, Kitchens and recreation hall, medical superintendent or deputy's house, chapels, laundry and workshops (work was an integral part of the therapy), boiler house and chimneys, and sometimes farms and railway stations – these huge institutions formed impressive and coherent ensembles

That need to be assessed for listing in the round, especially if the landscapes (which may be candidates for registration) survive to anything like their original layout; conservation area Designation can be appropriate too. Later asylums break down the institutional quality of Hine's prototype by dividing them into smaller units, a counter-trend that is worthy of note.

Appendix 2 Validation Requirements. (extracts)

A full copy can be downloaded from this link

www.breconbeacons.org/the-authority/planning/validation-requirements/view?searchterm=validation+

The Validation Requirements state:

Conservation Area Assessments

Required for all applications located within a Conservation Area

Proposals within a Conservation Area should include an assessment of the appearance of the proposed development within the context of its historic setting and the street scene together with an assessment of the effect of the development on the character and appearance of the Conservation Area. This assessment could form part of the DAS or Design Statement as appropriate. Any proposal to demolish a building within the Conservation Area will need to be accompanied by a structural survey and a detailed justification of the proposed demolition together with an assessment of the impact of the demolition on the special character of the area. The statement of justification should be based on the following criteria:

- Evidence that it is not practicable to continue to use the building for its existing use;
- That there is no other viable use for the building;
- Preservation in some form of charitable or community ownership is not possible or suitable; and

Cont /...

- Redevelopment would produce substantial planning benefits for the community, which would decisively outweigh the loss resulting from the demolition.

Existing and Proposed Elevations (Scale 1:50 or 1:100)

Required for all applications unless otherwise stated

Plans shall accurately show: - the proposed works in relation to what is already there. All existing and proposed elevations.

Existing and Proposed Floor Plans (Scale 1:50 or 1:100)

Required for all applications unless otherwise stated

Plans shall accurately show: the full area of all existing and proposed floors and roofs affected by the development. Any existing building(s) or wall(s) to be demolished. New buildings should also be shown in context with adjacent buildings

Existing and Proposed Site Sections, Finished Floor and Site Levels (Scale 1:50 or 1:100)

Required for all applications for new dwellings, any applications that involve distinct topographical changes or proposals involving sloped sites and where appropriate to the applications.

Plans shall accurately show: cross section(s) through the application site. Existing and finished levels to include details of foundations and eaves and how encroachment onto adjoining land is to be avoided, where the proposal involves a change in ground levels. Relationship between proposed building(s) to existing site levels and neighbouring development/adjoining buildings, to show existing site levels and finished floor levels.