



JMS PLANNING & DEVELOPMENT

PLANNING STATEMENT IN SUPPORT OF AN
APPLICATION

BY
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RESIDENTIAL REDEVELOPMENT AND ASSOCIATED
WORKS

AT

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JANUARY 2025

Project: Residential Redevelopment

Client: Brian Wilkins

Date: January 2025

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CONTENTS

SECTION 1:	INTRODUCTION	1
SECTION 2:	SITE AND SURROUNDING AREA	2
SECTION 3:	PLANNING HISTORY	4
SECTION 4:	THE PROPOSAL	5
SECTION 5:	PLANNING POLICY	7
SECTION 6:	PLANNING ISSUES	19
SECTION 7:	CONCLUSIONS	30

SECTION 1: INTRODUCTION

- 1.1 This Planning, Design and Access Statement has been prepared on behalf of Brian Wilkins and is submitted in support of an application for the redevelopment of the existing 3no HMO units to self-contained accommodation. The proposal includes the subdivision of the exiting units with a rear extension to accommodate new accommodation.

- 1.2 This Planning Report should be read alongside the application drawings which have been submitted and accompanying reports. This Planning Report sets out a description of the application proposal, an overview of relevant planning policy and consideration of the relevant planning issues. Accordingly, Section 2 provides an overview of the site and surrounding area, Section 3 provides an overview of the planning history. Details of the application proposal are set at Section 4, whilst an overview of pertinent planning policy is provided at Section 5. The relevant planning issues are set out at Section 6 and the conclusions provided at Section 7.

SECTION 2: SITE AND SURROUNDING AREA

- 2.1 The application site is located entirely within the settlement boundary of Aberystwyth, which is designated as one of the 'main 6 towns' of Ceredigion, as described within the Local Development Plan and defined as Urban Service Centres (USC). These six towns, are deemed the focus of LDP strategy owing to their diverse range of services and facilities playing a strategic role for the county.
- 2.2 The settlement of Aberystwyth is the largest town in Ceredigion, and one of the largest towns of the Mid Wales Region, with an estimated population of 71,300 in 2022 (Source: Office for National Statistics). Aberystwyth is considered one of the most sustainable locations within Ceredigion and plays a strategic regional role owing to the presence of large-scale services and facilities, such as the University, Bronglais Hospital, National Library of Wales, to name a few.
- 2.3 The town also has a pivotal function of employment within the area, thus providing numerous jobs from employers such as Ceredigion County Council, National Resources Wales and Welsh Government, amongst a wide array of smaller businesses.
- 2.4 Owing to its seaside location, Aberystwyth is a popular holiday destination, which aids the tourism and leisure industries, and provides significant economic benefits to the area.
- 2.5 Aberystwyth is considered the main hub for transport in the County, with public transport links offering services via bus and train, allowing a more sustainable means of access to wider areas such as North Wales (via Dovey Junction to Pwllheli), and a direct service to Shrewsbury, which offers more services to cities and towns across Wales.
- 2.6 The site in total measures approximately 430 square meters, which includes the existing 3no. residential properties, front and rear

courtyards, amenity area, recycling and bin storage area, bicycle parking and new planting areas.

- 2.7 In the surrounding area there is a wide variety of uses. The immediate surrounding area would be mainly attributed to residential, including the Penmorfa accommodation provided by the RSL 'Barcud' situated to the rear of the site. However, immediately to the South-West, a large depot (B2/B8 use), known locally as Cambrian Tyres is located. Within less than 100 meters, there are a range of shops, take aways pubs and restaurants, in addition to community buildings such as the Morlan Centre.
- 2.8 The application site falls within Zone A of the Development Advice Maps (DAM) as contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004) and the latest mapping available, Flood Map for Planning (FMfP), highlights the application site is located outside the higher risk areas of Flood Zone 2 and Flood Zone 3. The TAN15 Defended Zone extends to the junction of the A487 - Northgate Street and Vaynor Road.
- 2.9 For the avoidance of doubt, the application site is not protected with Listed Building status, nor does the application site fall within statutory designated areas such as SSSI, SPA, or SAC's. However, the application site falls within the Aberystwyth Conservation Area, which was originally designated in 1969 and extended in 1984 to include the main core of the town, seafront and the North of the railway line.

SECTION 3: PLANNING HISTORY

- 3.1 A planning history search has been undertaken for the site using Ceredigion County Council's online planning portal.
- 3.2 There is little known planning history relating to the site, however, any known planning applications are highlighted below in chronological order.

Application No.	Proposal	Decision
981166	Erection of a 2-storey extension to the rear	Refused 12/02/1999

- 3.3 Within the immediate vicinity, further planning applications are visible, mainly relating to the depot, known as 'Cambrian Tyres' and No.10 North Road. The planning history relating to these addresses are identified below.

Application No.	Proposal	Decision
771003	Alterations to offices and showrooms	Approved STC 11/10/1977
851101	Change of use of service area to sales area	Approved STC 20/12/1985
971192	Raising roof to form office accommodation to first floor. Demolition of building to front entrance.	Approved STC 10/02/1998
900500	Conversion of a dwelling into four self-contained flats.	Approved STC 17/06/1990

SECTION 4: THE PROPOSAL

- 4.1 The proposed re-development relates to the subdivision of the existing residential units, which currently form a terrace of three properties, that are used as Houses of Multiple Occupancy (HMO).
- 4.2 The proposal seeks full planning permission for the conversion of the existing HMO's to 12no. self-contained apartments, with the inclusion of an extension to the rear of the properties to facilitate the most efficient use of land.
- 4.3 In total, the application site area measures approximately 430 square meters, and will include the provision of an external courtyard, amenity area, refuse and recycling area, clothes drying area (rotary washing lines), herb garden and planting areas and the residential units themselves.
- 4.4 Access to the site is derived directly off Vaynor Street, whereby paved pedestrian walkways are provided either side of the road. The residential units are accessible via the pavement or the nearby footway which runs parallel the properties. On-street parking is available along Vaynor Street and the nearby streets of North Road and Queens Road.
- 4.5 Internally, the existing units will be reconfigured to accommodate 6no. 1-bedroom, self-contained apartments. Each apartment contains an open-plan kitchen/diner, 1 bedroom and bathroom equating to an average floor space of 38 square meters.
- 4.6 Externally, the proposal seeks the demolition of the existing 2-storey extensions of unit 8 and 10, and the demolition to the single storey extension of unit 12. The associated outbuildings will also be removed as part of the application allowing an extension to provide a further 6no. self-contained apartments, split across 3 storeys,

- 4.7 Currently, the existing extensions occupy a footprint of circa 85 square meters, with the proposed extension occupying a slightly larger footprint of 122 square meters.
- 4.8 3no. of the total 12no. units proposed will designated 'affordable' units. Therefore, proposal exceeds Policy S05 of the Local Development Plan which seeks to negotiate a 20% affordable proportion on all housing development.

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SECTION 5: PLANNING POLICY

- 5.1 This Section sets out an overview of national planning policy and Development Plan policy relevant to the proposal. The development plan for Ceredigion consists of the Ceredigion Local Development Plan (LDP), no Strategic Development Plan (SDP) has been adopted for Mid Wales to date.

National Planning Policy

Future Wales – The National Plan 2040

- 5.1 Policy 1 of Future Wales outlines that national policy is supportive of sustainable development across the nation but is primarily focused on shaping growth and regeneration within National and Regional Growth Areas, whereby Aberystwyth is noted as the largest town of the Mid Wales region and recognised for its significant role and function to the immediate and surrounding area.
- 5.2 Aberystwyth forms part of the Mid Wales Regional Growth Area and arguably the most significant given its strategic role within the economic, transport and housing sector.
- 5.3 Policy 2 of Future Wales sets out a series of strategic placemaking principles to shape growth and regeneration in urban areas. Said placemaking principles are:
- Creating a rich mix of uses
 - Providing a variety of housing types and tenures
 - Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other
 - Increasing population density, with development built at urban densities that can support public transport and local facilities
 - Establishing a permeable network of streets, with a hierarchy that informs the nature of development

- Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders
- Integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment

5.4 In-line with the placemaking principles Policy 7 clearly states that 'providing housing in Wales at levels which meet our needs is a key priority for the Welsh Government. The planning system must facilitate the provision of additional market and affordable housing.'

5.5 Future Wales acknowledges that housing delivery has declined over the past 50 years and notes that the delivery of open market housing is vital, in addition to the requirement for more affordable housing.

5.6 Future Wales notes that thriving, resilient and sustainable settlements are characterised by a rich mix of housing, employment, services and infrastructure located in the right places to meet the needs and future aspirations of the population. Moreover, PPW sets out that a broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. In accordance with the supporting text of Policy 4 of Future Wales, different uses should be situated in close proximity to each other, reflecting the strategic placemaking principles, to help create vibrant active places where people can walk and cycle and are less reliant on cars.

5.7 Future Wales acknowledges that there is a high degree of mobility between places, where people travel to access services, facilities and jobs outside of the place they live in Mid Wales, however, development within Aberystwyth is served by frequent public services such as buses and trains, and also benefit active travel routes and suitable means of travel by foot.

- 5.8 As noted previously, there is a diverse mix of uses located within close proximity of each other in Aberystwyth which promotes the sustainable principles in that people are able to live near their workplace and reduce the need for private travel. The strategic placemaking principles are reflected within the proposal and proves that this is a sustainable location, on a brownfield site within the settlement boundary of Aberystwyth.
- 5.9 The proposal would not lead to any unacceptable flood risk and proves compliance with the strategic approach contained within Policy 8 of Future Wales.
- 5.10 Policy 9 of Future Wales sets out the overarching requirements in relation to ecological networks and green infrastructure. Action towards securing the maintenance and enhancement of biodiversity to provide a net benefit, the resilience of ecosystems, and green infrastructure assets must be demonstrated as part of the development proposal through innovative, nature-based approaches to site planning and the design of the built environment.
- 5.11 In line with Future Wales, development must be directed towards sustainable locations and designed to make it possible for people to make sustainable and healthy travel choices for their daily journeys. As highlighted, the proposal is located within walking distance of numerous shops which can easily meet the daily needs of residents.
- 5.12 The applicant is fully aware that to meet the requirements of Policy 12 that active travel must be an essential and integral component of all new development. This is a redevelopment proposal and is based within a designated Urban Service Centre where housing, employment and community facility development is accepted under the LDP. New developments should be integrated with active travel networks and, where appropriate, contribute towards their expansion and improvement.

- 5.13 Encouraging a reduction in car use and an increase in active travel and use of public transport is promoted. In this scheme designated car parking is unavailable within the site, however, on-street parking is available on Vaynor Street, North Road and Queens Road.
- 5.14 Policy 25 of Future Wales supports sustainable growth and development within the Mid Wales Region, specifically that of Aberystwyth owing to its function, facilities and services within the region and relationship with other regions.
- 5.15 In line with the Planning and Compulsory Purchase Act 2004, should a policy in Future Wales conflict with a policy in the Ceredigion LDP, then the conflict should be resolved in favour of the policy contained within Future Wales. This is due to Future Wales being the latest document to become part of the development plan.
- 5.16 As outlined within this Section, policies 2, 3, 6 (policy 6 more related to retail, commercial and other economic uses as opposed to housing) and 8 will ensure development in the region's towns is sustainably located in areas with good access to public transport where reliance on the car can be reduced.

Planning Policy Wales (Edition 12) (2024)

- 5.17 Planning Policy Wales Edition 12 published in February 2024 sets out the vision for Wales as set out in the Well-Being of Future Generations Act;
- a more prosperous Wales;
 - a resilient Wales which supports healthy, functioning ecosystems and recognises the limits of the global environment;
 - a healthier Wales;
 - a more equal Wales;
 - a Wales of more cohesive communities;
 - a Wales of vibrant culture, and a globally responsible Wales.

The document embeds the spirit of the Act by moving towards a low carbon, resilient society, of providing secure and well-paid jobs and of building well connected environments for everyone in Wales that improves lives, health and enhances well-being.

- 5.18 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government and is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars and policy clarification letters which together with the PPW provide the National Planning Policy Framework for Wales (paragraph 1.1).
- 5.19 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and culture wellbeing of Wales as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places (paragraph 1.2).
- 5.20 PPW seeks to promote the right development in the right place, thus contributing to the overarching goal of sustainable development. Securing the correct development in the most sustainable locations, such as Aberystwyth, will deliver effective means of development whereby proposals will create and sustain communities, facilitate accessible and healthy environment and grow the economy in a sustainable manner, in-line with key planning principles.
- 5.21 In response to the challenges laid down by the Global Biodiversity Framework agreed at COP15, a series of changes were made to Chapter 6, which came into effect on 11th October 2023. The main changes to policy can be summarised as follows:

Green Infrastructure: stronger emphasis on taking a proactive approach to green infrastructure covering cross boundary considerations, identifying key outputs of green infrastructure assessments, the

submission of proportionate green infrastructure statements with planning applications and signposting Building with Nature standards.

Net Benefit for Biodiversity and the Step-wise Approach: further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit. The importance of strategic collaboration to identify and capture larger scale opportunities for securing a net benefit for biodiversity is recognised.

Protection for Sites of Special Scientific Interest: strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a 'living landscape'. Other development is considered unacceptable as a matter of principle. Exceptionally, a planned approach may be appropriate where necessary safeguards can be secured through a development plan.

Trees and Woodlands: closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place.

Technical Advice Notes (TAN)

5.22 The Technical Advice Notes (TANs) provide guidance on a range of specific topics. The pertinent TANs in relation to the application site are:

- TAN5 – Nature Conservation and Planning
- TAN11 – Noise
- TAN12 – Design
- TAN 15 – Development and Flood Risk
- TAN18 – Transport
- TAN20 – The Welsh Language
- TAN23 – Economic Development
- TAN24 – The Historic Environment

Local Planning Policy

- 5.23 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.24 The Development Plan comprises of Ceredigion Local Development Plan 2007-2022 and accompanying Supplementary Planning Guidance's.
- 5.25 Policy S01 – Sustainable Growth states that in terms of employment opportunities to provide for 4000 jobs across the County in a sustainable manner and there is the option of looking at sites that have not been allocated.
- 5.26 The application site falls within the settlement boundary for Aberystwyth an Urban Service Centre and within the defined Settlement Boundary, for the purposes of this application, the proposal is considered against Policy S02 (Development in Urban Service Centres). The policy states that USCs provide the most sustainable locations where development will be permitted and in relation to Aberystwyth proposals will be supported where it:
- a. Contributes to the maintenance of its national significance and its role as a strategic centre for Mid Wales; and
 - b. Supports current objectives and action plans relating to its Strategic Regeneration Status
- and in relation to all USC's, is within the defined settlement boundary, accords with the provisions of the Settlement Group Statement and satisfies all other plan policies.

- 5.27 Policy S02 highlights that the USC's of the county are the primary focus for development given their sustainability, range of facilities, services and employment opportunities.
- 5.28 Appendix 2 of the LDP provides a breakdown of required housing units, commitments and outstanding consents and the latest figures (July 2024) suggest that of the 1877 units required under the plan within the Service Centre, 669 units have been completed with a further 278 units granted consent, in addition to a loss of 71 units (through conversion or demolition), a remaining requirement of 1001 units is needed within the Service Centre.
- 5.29 This demonstrates that over the course of the LDP (2007-2022), there has been a significant under delivery of units within the Service Centre and this proposal would begin to tackle the under delivery of open market housing and affordable housing.
- 5.30 LDP policy S05 seeks to negotiate a proportion of 20% affordable housing on all housing developments, which would be secured by way of legal agreements contained within a Section 106. However, should there be a justified case the applicants reserve the right to negotiate a reduction in affordable housing by submitting details to show lack of viability for the site.
- 5.31 Policy DM06 relates to high quality design and Policy DM17 relates to the General Landscape with Policy DM10 requiring all developments to respect the landscape and protect the local and strategic views. These policies have been considered and adhered to for each aspect of the proposal with particular emphasis of ensuring a high-quality finish which reflects and respects that of the conservation area.
- 5.32 This scheme is considered to produce a limited impact on the landscape. The proposal sees an extension to the rear of the existing properties, however, the extension is of a similar footprint to that of the existing extensions, although scale and massing will be increased. The

extensions follow a similar form to the adjacent building (Cambrian Tyres) and given its screening by the depot and the properties located along North Road, there is unlikely to be an impact to the surrounding landscape, especially given its urban context.

- 5.33 Policy S05 relates to Affordable Housing, which seeks to negotiate a proportion of 20% affordable housing on all housing development. The applicants reserve the right to negotiate a reduction in affordable housing by submitting details to show lack of viability for the site.
- 5.34 Policy LU02 relates to the requirements regarding all residential development and that housing development will need to provide “a mix of dwelling types and sizes to help secure a balanced housings stock, in that local area.” This ensures that the right types of dwellings are provided to meet the demographic needs of the area.
- 5.35 Given the nature of the existing site being existing housing units, it is unlikely that the delivery of the proposed units would require a ‘phased’ or ‘staged’ release as outlined by LDP policy LU05. As highlighted previously the applicant is a reputable local developer who has undertaken significant residential developments within the surrounding area, and keen to continue providing high-quality residential accommodation to those in need.
- 5.36 Policy LU06 relates to Housing Density and notes that density for a proposed housing development should be set out in accordance with the relevant settlement group statement; however, the site is not allocated and does not have a suggested housing density within the settlement group statement. Notwithstanding the above, LU06 outlines that where there is not set density, in areas which constitute ‘urban’ areas, the guide range density is set between 30 and 80 units per hectare. This is akin to the advised density set out within Future Wales which states that developments in urban areas should aim to have a density of at least 50 dwellings per hectare. Albeit that the proposed density would surpass that of the LDP and Future Wales, the density does not give rise to

adverse amenity issues and provides efficient means of accommodation, especially in an urban context whereby land availability is limited.

5.37 Possibly most pertinent to this application would be LDP Policy LU07 which permits the subdivision of existing dwellings to flats providing that;

1. The dwelling is of a suitable size and layout capable of conversion without substantial extension;
2. The development does not adversely affect the amenity of the adjoining occupants and includes adequate soundproofing between units;
3. The development does not result in significant parking problems;
4. There is adequate provision for the storage of refuse; and
5. Provision of 3 and 4 bedroom apartments is included as part of the mix, where there is evidence of unmet local need for larger flats and the property has appropriate physical capacity.

5.38 The size of the 3no. existing units (8,10,12) are of a size which is ripe for conversion, similar to the larger town houses of Aberystwyth, whereby the conversion/subdivision of such units is deemed inevitable, as noted within the LDP. The layout of the properties can easily be reconfigured internally to allow the successful delivery of the proposed units. Whilst undertaking the development the developer can include the installation of soundproofing to conform with the policy and protect the amenity of occupiers.

5.39 The proposed rear extension equates to a footprint similar to that of the existing extensions to each of the properties, however, would be of a larger scale, massing and bulk. Albeit that the overall floor area would be increased, the extension would be subservient to that of the existing units and as the extension would be formed at the rear of the property, any perceived impact is localised. The existing units measure a total width of approximately 18.2 meters, whereas the proposed extension would measure circa 12.6 meters.

- 5.40 The amenity to occupiers of the apartments have been carefully considered and designed in a manner which protects privacy and safety in addition to the relevant development quality requirements.
- 5.41 With regards to the amenity of nearby residential properties, it must be noted that the 2no. properties which are located on North Road are already impacted by the existing units. The North-East boundary of the proposed site and the rear elevation of the existing residential units along North Road are only separated by a 2 meter 'buffer' with a rear side gate attached to the side elevation of the proposed site. Like many urban areas, there are at times overlooking and overshadowing, and in this case, whereby the units on North Road are almost 4-storey there is inevitably aspects which are uncontrollable. Having said that, any impact may be mitigated by frosted or obscured glazing.
- 5.42 The sites' location within the town, allows the benefit of becoming 'car-free', which improves sustainability and physical well-being. With most services and facilities being within walking distance, it may be argued that the car parking spaces would not be needed. However, should occupiers own a car, there would be on-street parking along Vaynor Street, North Road, and Queens Road to name a few.
- 5.43 The storage of refuse and recycling is appropriately managed by the provision of a designated refuse point which measures some 9 square meters, which will accommodate sufficient room for individual bins and storage receptacles for the units. The storage area is accessible to each apartment via a communal courtyard area to the rear of the site.
- 5.44 The final criterion of LDP Policy LU07 relates to the provision of 3- and 4-bedroom apartments included as part of the mix where there is evidence of unmet local need. The proposal does not include such units, however, the proposal is not tailored to families, moreover proposal has intentionally targeted a demographic whereby there is a demonstrated

need for 1-bedroom apartments, as indicated in the Local Housing Market Assessment (LHMA).

- 5.45 In light of the above, the proposal accords with all the relevant criterion of LU07 and the supporting text of the policy. However, more detail may be provided within the Planning Issues section below.
- 5.46 Policy LU24 requires every development which provides more than 10 bedrooms to provide open space. The aim of Policy LU24 is to provide additional open space where appropriate as part of new developments. By doing so the health and wellbeing of communities will be enhanced and social cohesion will be encouraged.
- 5.47 A scheme for SUDS will be submitted separately to the SAB body in line with Policy DM13.
- 5.48 Finally in terms of ecology, a Green Infrastructure Statement has been prepared which conforms with the requirements of Policy DM14, DM15 and Policy DM20 of the LDP.

SECTION 6: PLANNING ISSUES

6.1 This Section of the supporting Planning Statement sets out an overview of the general planning issues for each phase which are considered relevant in the determination of the applications. Accordingly, the following general planning matters are considered below:

- The principle of the development;
- Affordable Housing;
- Design and Visual Impact;
- Amenity;
- Access;
- Ecology
- Utilities and
- Flooding

6.2 The application site is located within the settlement boundary of Aberystwyth, which is designated as an Urban Service Centre (USC), whereby LDP policy S02 states that development will be permitted which, in relation to Aberystwyth:

- 1a. Contributes to the maintenance of its national significance and its role as a strategic centre for Mid Wales and;
- 1b. Supports current objectives and action plans relating to its Strategic Regeneration Status;

In relation to all USCs:

- 3a. Is within the defined settlement boundary, accords with the provisions of the Settlement Group Statement and satisfies all other Plan policies.

6.3 The proposal is deemed to assist the regeneration of the brownfield site which currently comprises of 3no. dilapidated HMO units, with 15-bedrooms across the 3 units. The units are of poor state of repair

internally and externally, which is detracting from the surrounding area, especially given its location within the Aberystwyth Conservation Area.

- 6.4 The negatives associated with HMO's are plenty and well known, varying from social, environmental and economic impacts. Most commonly, anti-social behaviour, increased crime, noise and nuisance characterise many HMO units, however, the negatives are not solely related to such characteristics and effect more than neighbouring properties. Social imbalances and unsustainable communities often lead to local population displacement, in turn often resulting in a loss of local culture, and widespread demographic changes.
- 6.5 Notwithstanding the above, it is acknowledged that HMO units play a role in providing suitable accommodation for a younger demographic, which also have benefits, especially to the nighttime economy.
- 6.6 Aberystwyth is the largest Town in Ceredigion and not only has a regional role, but arguably a national role owing to its transportational links connecting Wales and England, institutions such as the National Library and University, and employment opportunities from employers such as the Welsh Government and NRW.
- 6.7 As a consequence of its strategic role, function and sustainability, both national and local planning policy directs housing growth to Aberystwyth with the largest need and demand evident in the LDP strategy that provides for the largest housing allowance.
- 6.8 The provision of much needed housing would support the current (and future) objectives of LDP, whilst enhancing the regional and national role of the Service Centre in accordance with LDP Policy S02. Albeit that the site is not 'allocated' for housing within the LDP, and therefore seen as a 'windfall' site, there is a considerable under delivery of housing within the USC and accordingly there exists an adequate provision of housing commitment within the Aberystwyth USC to cater for the proposed development.

6.9 LDP Policy LU07 allows the conversion of large residential units to flats, subject to complying with 5 criteria set out in the plan and are outlined below for ease;

1. The dwelling is of a suitable size and layout capable of conversion without substantial extension;
2. The development does not adversely affect the amenity of the adjoining occupants and includes adequate soundproofing between units;
3. The development does not result in significant parking problems;
4. There is adequate provision for the storage of refuse; and
5. Provision of 3 and 4 bedroom apartments is included as part of the mix, where there is evidence of unmet local need for larger flats and the property has appropriate physical capacity.

6.10 The 3 HMO units are most certainly of a suitable size and layout that would allow ease of conversion to self-contained apartments which would require minimal internal work to give rise to individual apartments. Majority of the layout would be retained as part of the proposal with small reconfiguration to allow for additional rooms for bathrooms etc.

6.11 The proposal does include a rear extension to the units which measures approximately 122 square meters in footprint, allowing 6 no. apartments to the rear of the existing units. The LDP does not define 'substantial extension' within any text of the Policy, and it is considered that as the width of the proposed extension is some 6 meters less than that of the 3 units, and only have a footprint of 40 square meters more than the existing extensions, the proposal would not constitute a substantial extension that would have a significant effect to the site. Therefore, the proposal proves accordance with criterion 1 of LDP Policy LU07.

6.12 Criterion 2 of LU07 relates to the amenity of adjoining occupants. The size, design and layout of the proposed has been carefully considered

to ensure that the amenity of each of the units is protected at all times and that no adverse impact to amenity will arise. Should the requirement for increased sound insulation arise, additional sound proofing measures can be installed.

- 6.13 Criterion 3 seeks to address parking problems sometimes associated with developments of sub-divided properties. However, like many urban townscapes, more and more local authorities are promoting 'car-free' development. In a similar manner to that of the existing units, no on-site car parking provision is proposed, and on-street car parking is typically utilised on nearby streets. It may be argued that the conversion to self-contained apartments would create a betterment availability of on-street parking as there are currently 15 bedrooms, each of which may have their own car, whereas the proposed units would see a reduction in the number of bedrooms.
- 6.14 The target demographic of occupiers are likely to work and undertake majority of their day to day needs within Aberystwyth and not require a car, utilising more active travel methods such as walking and cycling.
- 6.15 A good offering of cycle parking provision is provided within the application site, with the intention of allowing occupiers to safely and securely house bicycles for travel.
- 6.16 Ample space is provided to store refuse and recycling with a designated enclosed area for safe and secure storage of bins and other receptacles, in accordance with criterion 4.
- 6.17 Unlike the existing management of placing the wheelie bins in the front gardens of the properties, the bins will be neatly stored to the rear of the properties whereby a far less visual intrusion to the streetscene will be experienced.
- 6.18 Finally, in relation to criterion 5 of Policy LU07, a mix including 3 and 4 bedroom properties are provided as part of a proposal where there is evidence of unmet local need and sufficient space is available to

accommodate such units. Although criterion 5 of LU07 was considered, upon designing a scheme, it was decided to focus on 1-bedroom apartments. This decision was derived from local knowledge, which demonstrated a demand for 1-bedroom apartments within the Aberystwyth area. The same demand is highlighted within the Council's LHMA which denotes a clear need for additional 1-bedroom apartments.

- 6.20 Although the LHMA also highlights a shortage of 4-bedroom properties in Aberystwyth, the modification works necessary to form a sufficient size 4-bedroom apartment would entail significant re-modelling of the buildings and likely conflict with criterion 1 of Policy LU07.
- 6.21 The choice of focusing on 1-bedroom apartments was determined by other factors of need such as potential use as temporary accommodation, accommodation to more elderly residents and more affordable accommodation for professionals. All of these issues have been raised locally, and the developer is keen to address such needs by tailoring developments to people who need these specific units.
- 6.22 Temporary accommodation is highlighted specifically in the LHMA and outlines that there is currently insufficient housing to meet the needs of those who require temporary accommodation, with the largest demand and need within Aberystwyth.
- 6.23 Since the Covid Pandemic, there has been a 77% increase in of people requiring temporary or emergency accommodation and the councils own evidence highlights that there is a significant shortfall in the current provision of temporary/emergency housing options.
- 6.24 The design and layout of the properties allows each of the apartments to enjoy self-contained, private accommodation. The units on the ground floor would be suitable for more elderly occupants who may have difficulty with accessibility and the 'step-free' design of the ground floor units would cater for those with any mobility difficulties. As I am sure we are all aware, Ceredigion has been suffering (and will likely

continue to suffer) from an ageing population, with predictions estimating that nearly 23,000 residents in Ceredigion will be aged over 65 years old in the next 12 years. It is likely that many of this demographic would prefer more accessible means of accommodation 1-bedroom apartments could assist in the with suitable housing for such residents.

- 6.25 Finally, and possibly most importantly, affordability was at the forefront of the brief. The choice of 1-bedroom apartments was considered the most appropriate form of accommodation in that typically, they would be more affordable than larger units. The necessity of more affordable units is evident throughout the county, and especially in the Aberystwyth area.
- 6.26 3 of the proposed 12 units would be designated as 'affordable' units, exceeding the 20% requirements as outlined by LDP Policy S05. A quarter of the proposed units will be designated as affordable which is a significant step to addressing the need for more affordable housing, especially that none of the 3 existing units contribute to affordable housing.
- 6.27 The residents of Ceredigion know all too well of the challenging housing affordability whereby the County suffers from lower than average salaries, but higher than average house prices. Albeit that Aberystwyth, in comparison to other regions of Ceredigion have a better affordability ratio, it is by no means affordable or realistic that professional would be able to afford their own home with out significant deposits by saving for years.
- 6.28 The provision of high-quality 1-bedroom accommodation would allow youngsters and professionals the opportunity to gain access to the housing ladder by ensuring that even open-market housing was attainable at a more affordable price.
- 6.29 Therefore, the choice of providing 1-bedroom self-contained apartments was weighed heavily in favour to begin tackling the needs of those who require housing most.

6.30 For the reasons outlined above, it is considered that the proposal is wholly compliant with LDP Policy LU07 and the principle of development is supported by national and local policy.

Design and Visual Impact

6.31 The size and scale of the proposed development is considered to be appropriate especially given the size and scale of the surrounding properties such as the tyre depot, Penmorfa, and the residential units along North Road. The extension proposed is situated to the rear of the properties and no changes of scale or massing are proposed to the front elevation, therefore, from a streetscene perspective, the visual impact would be negligible.

6.8 Special consideration was given to the design and finishing materials of the proposal as the site is located within the Aberystwyth Conservation Area. The ethos of the design centred around retaining, conserving or enhancing the design of the buildings and by virtue the Conservation Area. Full regard was given to the Aberystwyth Conservation Area Appraisal which would indicate that the application site would be considered as part of 'The Buarth' area – this includes the nearby streets of North Road, and Queens Road. However, the Conservation Area Appraisal acknowledges a more industrial-type area located towards the Eastern aspect of the Buarth area towards Northgate Street and Skinner Street. Arguably, Vaynor Street would be more akin to this area, with similar design features and characteristics, including smaller, 2-storey, terraced housing finished in stone. The application site contains many of the characteristics of the Buarth Area such as decorative stonework, ironwork to the front of buildings, original architectural features such as chimneys, windows (including dormer windows) and doors, small front gardens and hillside development.

6.9 These characteristics have all been retained as part of the proposal, therefore preserving the character and special quality of the area.

Further details regarding the proposal can be found within the accompanying Heritage Impact Assessment.

- 6.10 The proposal would be of a high-quality finish, having full regard and positively contribute to the context of its location and surroundings, proving accordance with LDP policies DM06 & DM07, national policies such as TAN24 and guidance provided by CADW.

Amenity

- 6.13 The amenity of the occupiers has been carefully considered and adjudged that the amenity between units will not be adversely affected. Given the orientation and layout of the internal units, noise and visual amenity between the units is unlikely to give rise to any harm in relation to privacy or amenity.
- 6.14 The amenity of neighbouring properties is already impacted by the existing units and extensions given their proximity. The 2no. units located adjacent the application site, along North Road, are situated less than 3 meters from the boundary and currently experience a poor outlook from a lower ground floor, ground floor and first floor level. In total the units along North Road are 4 storeys at the rear with the highest storey extending considerably above that of the application site.
- 6.15 The windows to the rear of properties along North Road face the side elevation of the application site, separated by approximately 3 meters. The rear windows of the application site, especially that of number 12 would likely be impacted by the rear windows of the North Road units, however, a small degree of overlooking is to be expected in an urban area such as this.
- 6.16 In order to minimise and mitigate any harm to privacy, there may be opportunities to install obscure or frosted glazing to alleviate risk to overlooking or privacy.

6.17 There are no other properties within 20 meters that would likely impact the amenity of existing or proposed dwellings.

Access

6.16 The main access to the site is derived from Vaynor Street, whereby proposed apartments 1, 2, and 3 would utilise the existing access doorways of the existing properties.

6.17 Vaynor Street benefits pavements on both sides of the road and other than a small step off the pavement the units are level and accessibility and manoeuvrability is generally very good throughout.

6.18 The remaining units (4-12) would be accessed via an existing passage to the Eastern side of Number 8, whereby a linking spiral staircase affords access to the accommodation.

6.19 Internally, the units will include level thresholds at the door access and throughout the entirety of the property.

6.20 Externally, the communal areas, such as amenity area, bicycle parking, refuse and recycling area will all be accessible to each of the units with level walkways surrounding the perimeter of the units. Thus, creating a more inclusive environment which is accessible to all.

6.21 With regards to means of access to the site, Aberystwyth boasts a good range of sustainable and active travel modes which are suitable for walking and cycling, in addition to a variety of bus and train services.

6.22 The nearest bus stop is located some 60 meters from the application site, with the train station approximately 300 meters South-West from the site. Thus, proving excellent transport and accessible links across the region.

Ecology

- 6.24 The application area comprises 3 HMO units with small rear courtyard areas that provide little to no ecological significance. There is little to no vegetation or trees at the site, other than overgrown trash and weeds. The immediate surrounding areas are attributed to residential use, that usually contain small, urban garden areas, that lack biodiversity.
- 6.25 It is considered that any works attributed to the redevelopment of the site is unlikely to have an adverse effect on this priority habitat.
- 6.26 The proposal will include biodiversity enhancements such as bird and bat boxes, whilst the garden/amenity area will include a herb garden, planters, and other biodiversity improvements such as bug and bee hotels.
- 6.27 As a result of the development, the proposal will give rise to a net benefit of biodiversity, in line with LDP policy DM14 & DM15, and the overarching goals of Chapter 6 of PPW. A Green Infrastructure Statement is included as part of the application and should be read in conjunction with this report.

Utilities

- 6.26 Foul sewage is proposed to be connected to the mains sewer as is the existing system. The applicant is aware that the public sewer is in close proximity and therefore a suitable means of connection.
- 6.27 Similarly, the property is connected to the main water system which will continue to be used for the proposed apartments.
- 6.28 The application will be subject to SAB approval as the development would result in provision of new building in excess of 100 square meters, in line with new statutory legislation enacted by Welsh Government under the Flood and Water Management Act 2010. Surface water is proposed to be captured on site and dispose of via a sustainable

drainage system water such as a soakaway. A SAB application has not been submitted to date but will be submitted as part of the application.

Flooding

- 6.57 The application site falls within Zone A of the Development Advice Maps (DAM) as contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004) and the latest mapping available, Flood Map for Planning (FMfP), highlights the application site is not located within the higher risk Flood Zone 2 or 3.
- 6.59 Therefore, it is considered that the proposal is unlikely to give rise to any unacceptable means of flooding in accordance with local and national policy.

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SECTION 7: CONCLUSIONS

- 7.1 The submitted application seeks full planning permission and conservation area consent for the subdivision and extension of the existing dwellings of 8, 10 & 12 Vaynor Street. The proposal will comprise of 12no. 1-bedroom self-contained apartments.
- 7.2 The proposed development aligns with the relevant Local Development Plan and National Planning Policy in that it provides much needed revitalisation and regeneration of the deteriorating dwellings which are currently utilised as HMO units. The proposal provides housing within the Urban Service Centre which has not delivered its allocation and that has seen limited growth over the past 15 years compared to what was envisaged.
- 7.3 The proposal will generate 3no. dedicated affordable properties, whilst the other units would also be more attainable to local buyers in comparison to nearby units, thus tackling the demand for more affordable 1-bedroom properties as outlined within recent research such as the LHMA.
- 7.4 The subdivision of existing properties is supported by LDP Policy LU07, with the LDP acknowledging that conversions provide a sustainable alternative to new build and have an important role to play in increasing the available level and type of housing stock available.
- 7.5 The proposal would secure significant investment to the dilapidated and tired looking buildings that have been poorly maintained and altered. The development would revitalise the properties in a sympathetic manner which protects, conserves, and given its current condition, would enhance the aesthetic and communal values of the properties, in turn, enhancing the Conservation Area.

- 7.6 The ecological and biodiversity enhancement included as part of the development would have a multi-faceted benefit to the site and surrounding area, environmentally and socially and are considered commensurate to the site.
- 7.7 Based on the above it is kindly requested that planning permission is forthcoming for this proposal.

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