

Cassidy+
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Architecture + Building Surveying + Town Planning

6-8 Nant Hall Road, Prestatyn

**Supporting Planning, Design and Access
Statement**

14th May 2024

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1.0 INTRODUCTION

1.1 On behalf of Nant Hall Developments Ltd, Cassidy + Ashton have been instructed to oversee the preparation and submission of a Full Planning Application with demolition in a Conservation Area, to Denbighshire County Council.

1.2 The application site is 6-8 Nant Hall Road, Prestatyn, LL19 9LH.

1.3 The proposed development is for the following:

Proposed change of use / conversion / part extension / part demolition to create mixed use development, comprising 18no apartments (Use Class C3), 5no holiday lets (Use Class C6), Café/Bar/Commercial Unit, Office Hub, car parking, landscaping and all associated works.

1.4 This supporting planning, design and access statement sets out the context of the site and considers the planning merits of the proposal, reaching the conclusion that the proposed development is compliant with local and national planning policy. This statement proceeds to outline and evaluate the design and access features of the proposal and how good quality design principles have been considered and applied.

1.5 This statement is to be read in conjunction with a series of plans and other documentation, comprising the planning application pack as a whole:

- Application Forms - *Cassidy + Ashton*
- Supporting Planning, Design and Access Statement - *Cassidy + Ashton*
- Community Linguistic Impact Assessment - *Cassidy + Ashton*
- Location Plan - *Cassidy + Ashton*
- Existing / Proposed Site Plans - *Cassidy + Ashton*
- Existing / Proposed Floor Plans, Elevations, Sections - *Cassidy + Ashton*
- Flood Consequence Assessment - *Ymgynghoriaeth Gwynedd Consultancy*
- Drainage Strategy - *JPS*
- Acoustic Report – *Lighthouse Acoustics*
- Heritage Statement - *Cassidy + Ashton*
- Tree Survey and AIA – *Indigo / Tree Solutions*
- Preliminary Ecological Appraisal, Green Infrastructure Statement and Net Benefit – *Sambrook Associates*

- Preliminary Risk Assessment – *Tier Environmental*
- Pre-application Consultation Report (TBC) - *Cassidy + Ashton*

2.0 SITE AND CONTEXT



Fig. 1 Site Location [Source: Google Maps]

- 2.1 The application site extends to 1,680m² and is comprised of the existing building, along with a rear parking area.
- 2.2 The building was historically Prestatyn Fire Station but has more recently been used as Council Offices, prior to becoming vacant.
- 2.3 The site is located within the centre of Prestatyn, immediately east of the High Street.
- 2.4 As such, the site is highly accessible to all necessary amenities and services within the town centre, including shops, restaurants, café's and pharmacies etc. Prestatyn Shopping Park is located immediately to the North of the site. A number of School's are within walking distance.
- 2.5 Prestatyn Bus Station is located 0.1 miles to the West, with frequent services to Holywell, Rhyl, Llandudno, Bagillt, Flint.
- 2.6 Prestatyn Railway Station is located 0.3 miles to the North-west, the primary rail operating companies are Transport for Wales and Avanti West Coast. Services are frequent to Manchester Airport, Llandudno, Cardiff, Wolverhampton, Holyhead.
- 2.7 The site is also highly accessible via private motor car, situated in close proximity to the A548. The A55 North Wales Expressway c. 6 miles to the South.
- 2.8 As such, it is clear that the site is in a highly sustainable and accessible location.

PLANNING HISTORY

- 2.9 An online search of the Denbighshire County Council planning register has revealed the following relevant planning applications.
- 2.10 **Application ref. 2/PRE/0216/87/D** – Office Extension – Municipal Offices, Nant Hall Road, Prestatyn

Granted 29.07.1987
- 2.11 **Application ref. 2/PRE/0310/87/D** – Siting of Temporary Offices – Car Park Rear of Municipal Offices, Nant Hall Road, Prestatyn

Granted 09.09.1987
- 2.12 As shown above, the site was in use for Municipal Offices for a considerable period of time and the rear extension was associated with this use.

3.0 PROPOSED DEVELOPMENT

- 3.1 This application seeks conversion of existing 6-8 Nant Hall Road, along with part demolition / re-build.
- 3.2 The development involves the retention of original parts of the building, with a later existing extension to the rear proposed to be demolished and replaced with a new 5 storey extension. The re-build / new build elements are shown in light grey below. The development is to accommodate a combination of residential units, holiday units and commercial space within the building.

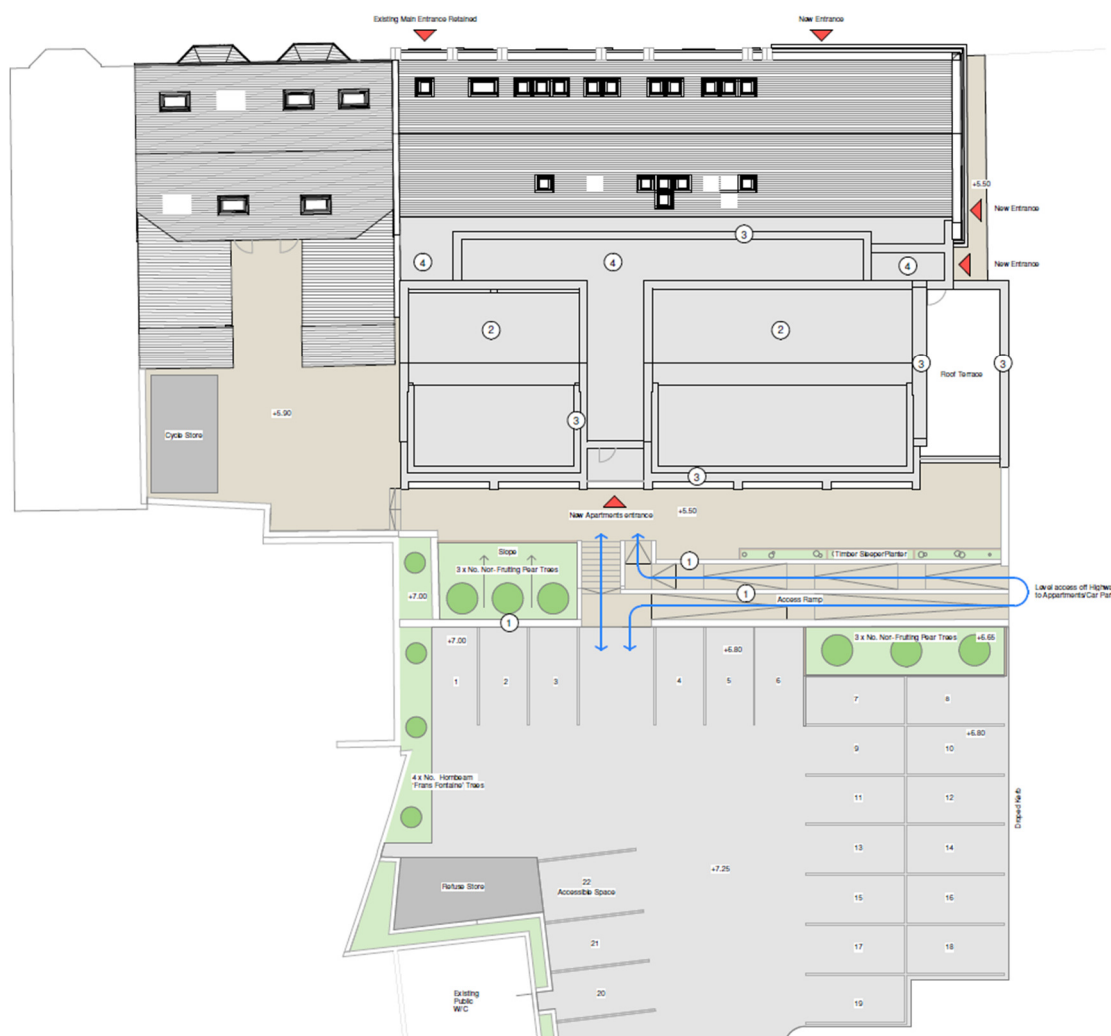


Fig. 2 Proposed Site Plan

- 3.3 The landscaping works to the rear include restructuring the car park to maximise parking spaces. The current step down to the building level is proposed to be re-worked to reflect the

building redevelopment and create a landscaped area with stepped and ramp access, tree planting and planters.

- 3.4 The number of car parking spaces is proposed to be increased. The layout as shown above accounts for an increase from 7no to 22no, this would involve a new dropped kerb off the highway facilitating access.
- 3.5 The proposed development is set out in detail in the design and access chapter.

4.0 DESIGN AND ACCESS

- 4.1 As per the Welsh Government and Design Commission for Wales' guidance, Design and Access Statements are a vital tool in ensuring the appropriate consideration of design quality and inclusive access when preparing planning proposals.
- 4.2 Design and Access statements therefore provide applicants the opportunity to detail specific design merits of proposals in support of planning applications. As a minimum, the following principles must be explained in relation to the application:
- Design / character (layout, scale, appearance)
 - Access
 - Community safety
 - Environmental sustainability
 - Movement to, from and within the development
- 4.3 The Welsh Government and Design Commission for Wales' guidance states that a design and access statement "is a document that should address a key question: 'why is it like that?' by explaining how the design has responded to the site, context, brief, vision, relevant policy and objectives of good design."
- 4.4 This design and access statement sets out the detailed and logical design process which was undertaken in the development of these proposals.
- 4.5 This statement therefore sets out how the objectives of good quality design have been considered and applied, in line with both national and local planning policy and guidance, including Technical Advice Note 12 (Design) and Supplementary Planning Guidance.

DESIGN AND CHARACTER

- 4.6 The proposals before you have been designed based on local vernacular and character, seeking to promote and reinforce local distinctiveness, whilst achieving a contemporary scheme of individual design and merit. The original elevation of the building fronting onto Nant Hall Road is retained in line with the scheme, with redevelopment focused on the later extension to the rear which is of little design merit.



Fig. 3 Visual

4.7 For the new build development, local vernacular / design features have therefore been applied throughout the design development, which incorporates gable features.

4.8 As shown in figure 3 above, the new build element will reflect the brick gable feature of the original building's east elevation, to complement its form and style, whilst representing a modern addition to the rear with the introduction of new materials such as cladding and a metal roof. The contrasting materials with lighter brick accent picks up on design cues from the Ty Nat, Vicarage and neighbouring 12 Nant Hall Road that has recently been developed for over 55's apartments.

LAYOUT

4.9 The proposed layout has been designed to make the most efficient use of the site in this prominent town centre location.

4.10 The conversion in the existing building will facilitate commercial space fronting onto Nant Hall Road which could be utilised as a Café/Bar and Office Hub, as shown below. 2no holiday lets are proposed with access from Nant Hall Road and access onto a shared courtyard. The new build element to the rear will facilitate 3no further holiday lets at the ground floor, accessed individually from the rear of the development.

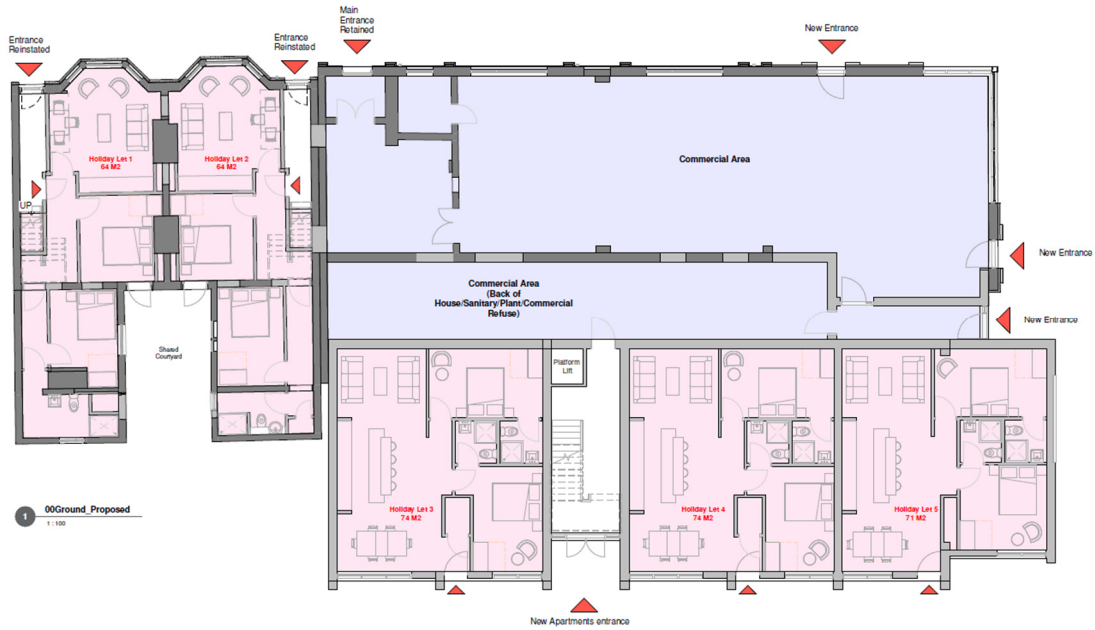


Fig. 4 Proposed Ground Floor Plan

4.11 As shown in Figure 5 below, 12no apartments are accommodated on the first floor. The units are split across the existing building and proposed extension. 10no units are accessed off the central stair core and corridor, whilst apartments 1 and 2 are accessed separately from the entrances off Nant Hall Road, also serving the holiday lets 1 and 2 at the ground floor. A shared residential terrace is included to the East of the building.

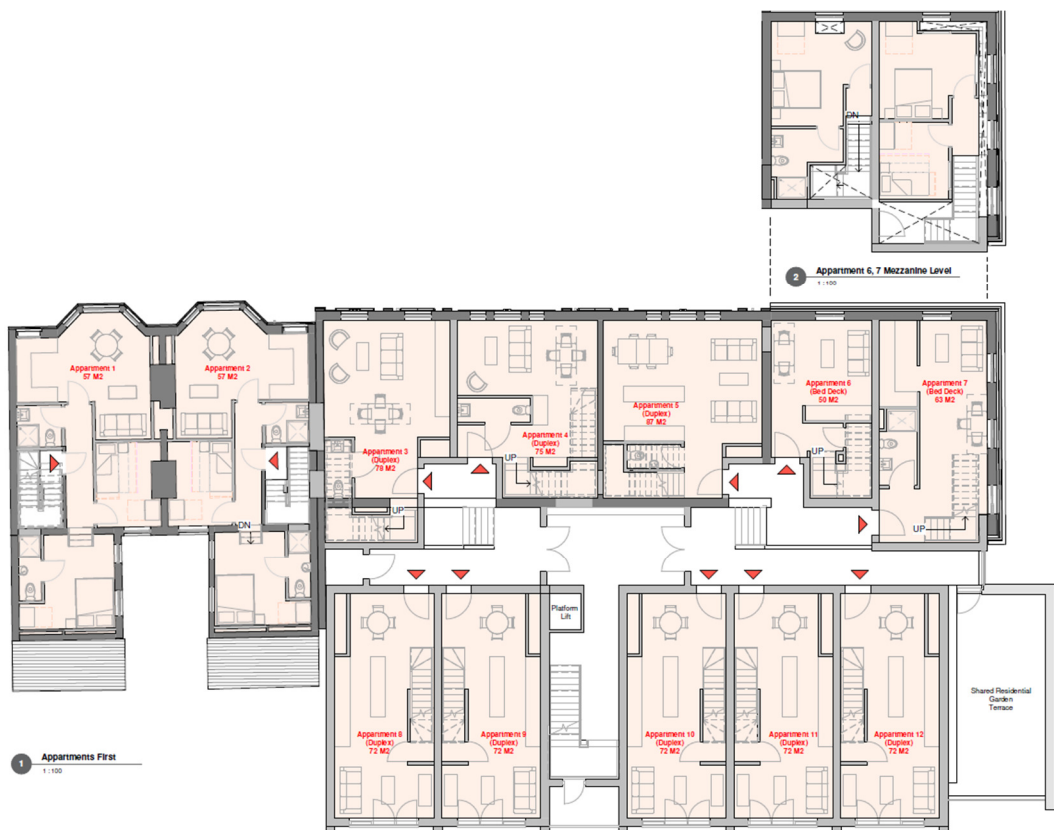


Fig. 5 Proposed First Floor Plan

4.12 As shown in Figure 6 below, apartments 8-12 extend to the second floor of the proposed new build element as duplex's. Due to the level change and



Fig. 6 Proposed Second Floor Plan

4.13 Due to the room heights and level change between the existing and proposed build, this floor applies to the new build only.



Fig. 7 Section Split

4.14 As shown in Figure 8 below, further duplex's are accommodated across the third floor, for both elements of the building.



Fig. 8 Proposed Third Floor Plan

4.15 The fourth floor applies only to the new build element and accommodates upper floors of the duplex's at the third floor.



Fig. 9 Proposed Fourth Floor Plan

4.16 As demonstrated through figures 4-9 above, the layout of the building is comparable across the floors, with designated zones for commercial and holiday lets, distinct from residential use.

SCALE

4.17 The scale of the building as existing is 2.5no storeys.



Fig. 10 Proposed Fourth Floor Plan

4.18 The new build extension, whilst it will accommodate 5no floors (ground – fourth), is not a relative increase in regard to height. The scale of the existing building is a large 2.5 storeys with generous floor to ceiling height.

4.19 On this basis, as shown in figure 10, the height of the extension compared to the existing building is a modest increase. The buildings scale is sought to represent a point of reference for a notable regeneration scheme within the town.

4.20 The scale of the building is not inappropriate considered in the context of surrounding buildings - the neighbouring apartment block on the former library site extends to 4no floors and is clearly at a higher ground level. With this in mind the proposed extension will sit comfortably within its context.



Fig. 11 Image of Neighbouring Scale [Source: Google Street View]

APPEARANCE

- 4.21 The overall appearance of the proposed development has been influenced by local vernacular and seeks to promote and reinforce local distinctiveness, whilst achieving a scheme of individual design and merit. This is explored further in the Heritage Statement.

AMOUNT

- 4.22 This proposal seeks detailed planning permission for the development of 18no residential units, along with 5no holiday lets, an Office Hub and a Commercial Unit which could accommodate a Café/Bar.
- 4.23 The design process started with identifying a viable, yet appropriate quantum of development for the site which respects its context whilst presenting itself as a distinct regeneration opportunity.

LANDSCAPING

- 4.24 The proposed site plan (Fig. 2) sets out the proposals in detail and demonstrates the landscaping approach to the site as a whole. The existing bank and car parking with 2no trees is proposed to be redeveloped to create a resident friendly layout with cycle parking, increased car parking, stepped/ramp access and planters.

ACCESS

- 4.25 The site is accessed from Nant Hall Road to the North, as well as to the East and South off the access road routing from Nant Hall Road to the High Street.

COMMUNITY SAFETY

- 4.26 Community safety has been a fundamental design consideration, in the form of both residential and highway safety.
- 4.27 The application site has been designed to minimise crime and the fear of crime, opening up the development to achieve natural surveillance, whilst also ensuring the privacy of individual properties.

ENVIRONMENTAL SUSTAINABILITY

- 4.28 The site is comprised of the existing buildings with car park (hardstanding and 2no trees). The site does not represent a biodiversity rich environment.
- 4.29 The Ecological Appraisal undertaken by Sambrook Associates has assessed all ecological assets and includes appropriate construction mitigation measures in the interest of preventing any potential impacts.

5.0 PRE-APPLICATION CONSULTATION EXERCISE

- 5.1 Following the enactment of the Planning (Wales) Act 2015, the requirement for pre-application consultation on major development was implemented.
- 5.2 The statutory requirement to consult is imposed by Section 61Z of the Town and Country Planning Act 1990.
- 5.3 Pre-application consultation exercises must include:
- Making draft planning application documents available to view;
 - Notifying the right consultees of the consultation;
 - Providing a 28 day consultation period; and
 - Reporting how the pre-application consultation was undertaken and how people's views were considered in a 'Pre-Application Consultation Report' submitted as part of the application.
- 5.4 A pre-application consultation exercise is being undertaken in line with these requirements. This process commenced on 14/05/2024 for a period of 4 weeks until 11/06/2024. Following this process, a period of review and amendment will take place, prior to submission of the formal planning application.

PRE-APPLICATION CONSULTATION REPORT

- 5.5 The details of this exercise, including representations made, a summary of responses and amendments / further comment in response to the items raised, will be set out within the separate 'Pre-application Consultation Report'.

STATUTORY CONSULTEES

- Adjoining Owners & Occupiers (letter drop)
- Prestatyn Town Council
- Ward Member(s) – Prestatyn East

Councillor Elen Heaton

Councillor Andrea Tomlin

- Councillors Adjoining Ward – Prestatyn Central

Councillor Jon Harland

Councillor Hugh Irving

SPECIALIST CONSULTEES

- Denbighshire County Council Highways Department
- Denbighshire County Council Conservation Officer
- Denbighshire County Council Rights of Way Officer
- Denbighshire County Council Biodiversity Officer
- Denbighshire County Council Health, Safety & Wellbeing Officer
- Denbighshire County Council Drainage & SAB Officer
- Denbighshire County Council Public Protection Officer
- Natural Resources Wales
- Welsh Water
- CADW
- Denbighshire Historical Society

6.0 NATIONAL PLANNING POLICY

- 6.1 Planning Policy Wales Edition 12 (PPW) was published in February 2024. PPW sets out the Welsh Assembly Government's planning policies for Wales and how these should be applied. This provides local government with the guidance to prepare their own local development frameworks and guidance in decision making.
- 6.2 Future Wales: The National Plan to 2040 applies the key principles of PPW and establishes how Wales should develop and grow.
- 6.3 Alongside the PPW and Future Wales sits 24 Technical Advice Notes (TAN), which form planning guidance at a national level on various topics.
- 6.4 This section will set out a summary of national planning policy guidance taken from PPW and the TAN documents.

PLANNING POLICY WALES

- 6.5 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 cultural well-being of Wales, as required by the Planning (Wales) Act 2015.
- 6.6 A plan-led approach is the most effective way to secure sustainable development through the planning system and it is essential that plans are adopted and kept under review. Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise, to ensure that social, economic, cultural and environmental issues are balanced and integrated.
- 6.7 The planning system should be efficient, effective and simple in operation. It is not the function of the planning system to interfere with or inhibit competition between users of and investors in land. It should not discriminate against or favour any particular group or members of society.
- 6.8 Figure 7 of PPW sets out how proposals should be prepared within the context of key planning principles of the planning system, this is included below (Figure 12).

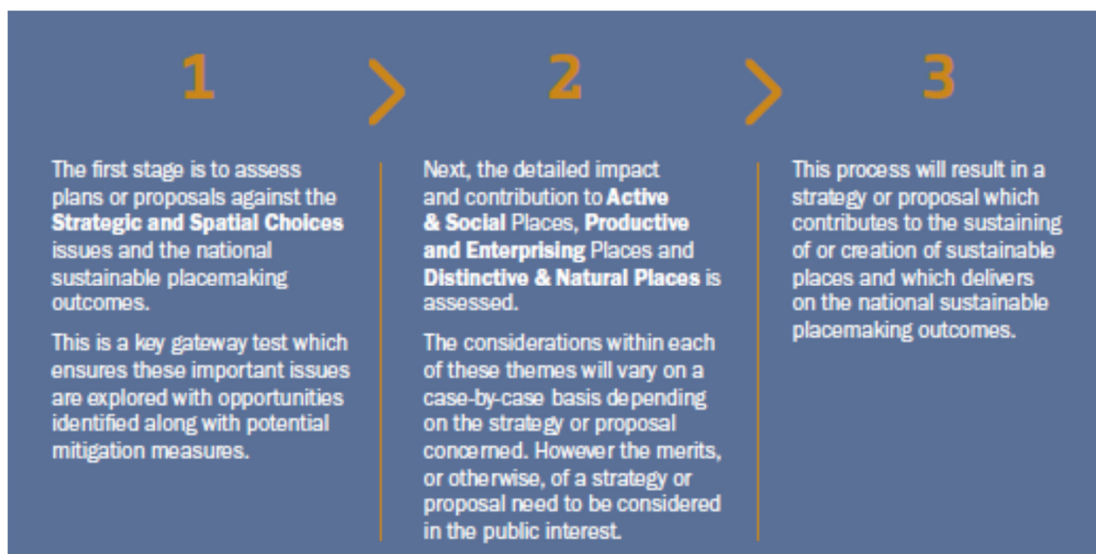


Fig. 12 PPW Extract



Fig. 13 PPW Extract

6.9 PPW states that the planning system should support sustainable development by improving the economic, social, environmental and cultural well-being of Wales. All of these elements must be achieved while acting in a manner that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Commentary

The proposed development within the central town location and designated development area (Nant Hall Development Brief) represents sustainable development. The proposals will

create additional jobs and facilitate economic development in a sustainable location, well related to the town centre of Prestatyn and its services.

This Statement concludes that no unacceptable harm will be caused as a result of the proposed development and, in particular, with respect to residential amenity, safety and wider environmental considerations. On the basis of the site location and characteristics, it is considered that the development will have a neutral / positive impact on the Environment. This is reinforced by the Preliminary Ecological Appraisal and Flood Risk Assessment.

PEOPLE AND PLACES – ACHIEVING WELL-BEING THROUGH PLACEMAKING

6.10 **Paragraph 2.2** states that Sustainable Places are the goal of the land use planning system in Wales; they are the output of the planning system rather than the process of achieving them. All development decisions, either through development plans, policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improved well-being.

Commentary

The application site is located within Prestatyn Town Centre and is identified for redevelopment in the Nant Hall Development Brief. The redevelopment of the vacant site will provide considerable economic and social benefit, in the form of economic uplift to spend the local area. This will be achieved without detriment to environmental considerations, as evidenced within the supporting documentation with reference to ecology, flood risk and highways.

In relation to Development Management, this application provides all necessary information for the scheme to be considered in full detail and concludes that the scheme is an appropriate form of development for this location.

This Statement, in conjunction with the accompanying reports, confirms that the application proposal will secure sustainable development and that all relevant social, economic and environmental considerations are supported by the proposal.

STRATEGIC PLACEMAKING

- 6.11 **Paragraph 3.43** states that preference for the re-use of land - previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, where it is suitable for development. In developing their spatial strategy planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development.

Commentary

The site represents the epitome of previously developed land with limited constraints for redevelopment. The proposed use of the site is consistent with both its previous use and that characterised by surrounding development, being within the town centre and a designated development site, as specified within the Nant Hall Development Brief.

PLACEMAKING IN ACTION – GOOD DESIGN MAKING BETTER PLACES

- 6.12 **Paragraph 3.5** states that

“Good design is inclusive design. Development proposals should place people at the heart of the design process, acknowledge diversity and difference, offer choice ... provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for everyone.”

- 6.13 **Paragraph 3.8** sets out that good design can help to ensure high environmental quality.
- 6.14 **Paragraph 3.9** highlights that the special characteristics of an area should be central to the design of a development.
- 6.15 **Paragraph 3.10** proceeds to state that in areas recognised for their particular landscape, townscape, cultural or historic character it can be appropriate to seek to promote or reinforce local distinctiveness.

Commentary

A detailed design process has been undertaken which has considered in detail the character of the site and the wider townscape. The proposal before you is a high quality design that provides a modern addition, whilst complementing the existing building’s original character. On this basis the proposal is in accordance with 3.5-3.10 above.

- 6.16 **Paragraph 3.11** highlights the importance of crime prevention and the fear of crime, stating that the aim of development should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' well-being goal.

Commentary

Community safety has been a fundamental design consideration, in the form of both residential and highway safety.

The application site has been designed to minimise crime and the fear of crime, opening up the rear area to achieve natural surveillance, whilst also ensuring the privacy of individual properties.

- 6.17 **Paragraph 3.12** highlights the importance of safe, sustainable links within and between developments.

Commentary

The site benefits from transport and accessibility links, being in the centre of Prestatyn and surrounded by a genuine choice of transport modes. The site benefits from an existing access point which is to be enhanced to facilitate additional car parking.

MOVING WITHIN AND BETWEEN PLACES

- 6.18 **Paragraph 4.1.51** states that a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking - contextually informed - is integrated in a way which does not dominate the development.

Commentary

The site benefits from an existing car park with 7no spaces. The proposal involves restructuring the landscaping area and maximising opportunities for parking, resulting in a proposal for 22no spaces.

TOURISM

- 6.19 **Paragraph 5.5** highlights that:

Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be

a catalyst for regeneration, improvement of the built environment and environmental protection.

6.20 Paragraph 5.5.4 proceeds to state that:

Much of the existing provision of facilities and accommodation for tourism occurs in urban locations, including historic and coastal towns and cities. There will be scope to develop well-designed tourist facilities in urban areas, particularly if they help bring about regeneration of former industrial areas. The sensitive refurbishment and re-use of historic buildings also presents particular opportunities for tourism facilities in all areas.

Commentary

Aligned with 5.5 and 5.5.4, the proposal will deliver tourism accommodation with the town centre. This will make use of an underutilised building of strong townscape character. The tourism accommodation will contribute toward economic prosperity consistent with the above policy.

ENERGY

6.21 Paragraph 5.7.13 states that the Welsh Government expects all new development to mitigate the causes of climate change in accordance with the energy hierarchy for planning.

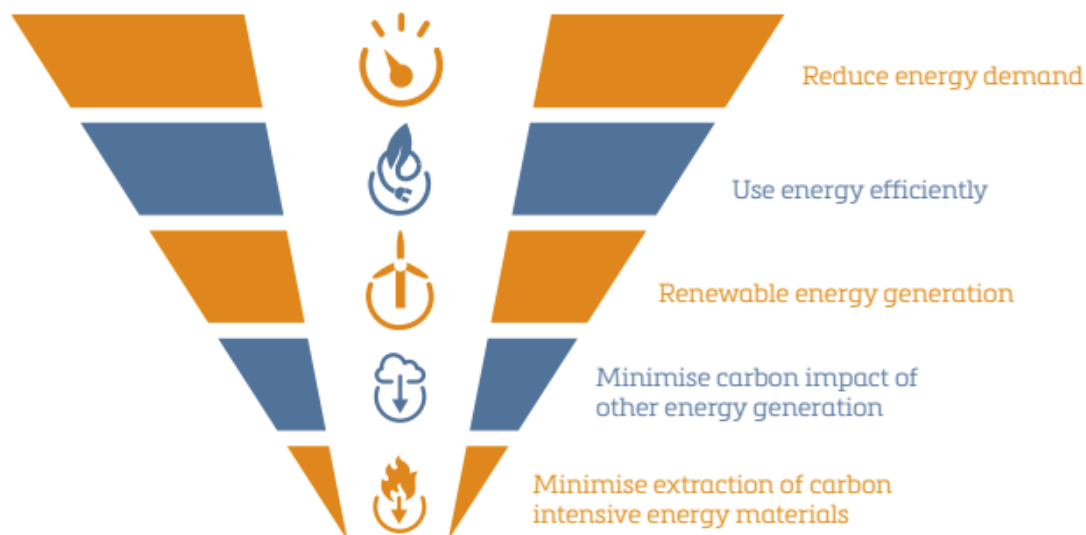


Fig. 14 PPW Extract, Energy Hierarchy for Planning

- 6.22 **Paragraph 5.8.1** asserts that the planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.

Commentary

Aligned with the above, the proposal will strive for high energy performance.

GREEN INFRASTRUCTURE

- 6.23 **Paragraph 6.2.4** states that green infrastructure plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in.

- 6.24 **Paragraph 6.2.12** states that:

A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants.

Commentary

The proposal has sought to incorporate green infrastructure, including terraced planters. 2no trees are proposed to be removed aligned with the site redevelopment. The trees existing as demonstrated through the updated tree survey, are in an inhospitable environment for their type and have a potentially limited future life. Proposed removal of the 2no trees is to be mitigated through introducing new trees/planting within the landscape area, which will provide established trees as replacement.

LANDSCAPE

- 6.25 **Chapter 6.3** relays the value of the landscapes of Wales, which are rich and varied. **Paragraph 6.3.3** highlights that the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should actively protect and enhance their special characteristics.

Commentary

It is presented that the proposed development is supported by the strategic policies and principles of PPW, as it seeks to deliver upon mixed use in the town centre, whilst making a positive contribution to the wider community and local landscape.

FUTURE WALES: THE NATIONAL PLAN TO 2040

6.26 Future Wales is a 20-year framework for planning the change and development of Wales to 2040, with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

6.27 Future Wales identifies that our economy is becoming increasingly service-based, with the fastest growing sectors 2008-2018 inclusive of education.

6.28 Future Wales sets out 11 ambitions / outcomes, supported by 36 specific policies.

Outcome 1 states that our cities, towns and villages will be physically and digitally well-connected places, offering good quality of life to their residents.

Commentary

Good quality of life to residents and users of the visitor accommodation will be achieved in line with the proposal, based on the highly connected location and variety of services and amenities in the immediate vicinity. The scheme has been designed to a high quality to benefit residents both internally and externally.

6.29 **Outcome 7** states that development will focus on active travel and public transport, allied with a reduced reliance on private vehicles.

Commentary

The application site is well connected to sustainable transport modes, including bus, rail, walking, cycling. The scheme will focus on encouraging sustainable modes of travel.

6.30 **Outcome 10** sets out the intention to protect and create places with biodiverse, resilient and connected ecosystems. While biodiversity has declined in recent decades, we will reverse these losses and enhance the resilience of ecosystems.

Commentary

The ecology appraisal undertaken by Sambrook Associates considers all potential biodiversity, including protected and invasive species. Bat surveys are scheduled between May and June. Following the result of the surveys, appropriate mitigation will be agreed, if

required. Aligned with this, following completion of the surveys, a Green Infrastructure Statement considering net gain will be completed.

- 6.31 **Policy 12 – Regional Connectivity** sets out the Welsh Government’s priority to support and invest in improving regional connectivity, including improving and integrating active travel.

Commentary

The application site is well connected to sustainable transport modes, including walking and cycling. The scheme will focus on encouraging active modes of travel, bringing further residences into the town centre to make use of the vast connections.

- 6.32 **Policy 21 – Regional Growth Area – North Wales Coastal Settlements** identifies Rhyl and Prestatyn as part of the Regional Growth Area. It is expected that new key facilities should be located in identified growth areas.

Commentary

Located within Prestatyn town centre, the site forms part of the Regional Growth Area and therefore new development is supported in principle.

The redevelopment will enhance the vitality of the site and the wider town, introducing new residents and visitors to further contribute to the economy. The scheme intends to act as precedent for further regeneration schemes in and around the area.

TECHNICAL ADVICE NOTES

6.33 Technical advice notes (TANs) provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans. Of those available, the most pertinent to the proposal are as follows:

Technical Advice Note 2 – Planning and Affordable Housing (2006)

Technical Advice Note 5 – Nature Conservation (2009)

Technical Advice Note 12 – Design (2016)

Technical Advice Note 13 – Tourism (1997)

Technical Advice Note 15 – Development and Flood Risk (2004)

Technical Advice Note 18 – Transport (2007)

Technical Advice Note 24 – The Historic Environment (2017)

6.34 The above TAN's have been considered and applied in progressing scheme design.

7.0 LOCAL PLANNING POLICY

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications must be determined in accordance with the development plan unless material considerations of which PPW, together with emerging development plans, indicate otherwise.
- 7.2 The current Development Plan relevant to this site is comprised of the Denbighshire County Council Local Development Plan 2006-2021 (adopted June 2013).
- 7.3 Denbighshire are currently in the process of preparing a new Local Plan, which is currently at the first formal stage of preparation, 'Pre-Deposit'.
- 7.4 The Local Development Plan written policies document is supported by the Proposals Map. The relevant extract is included below (Figure 15).

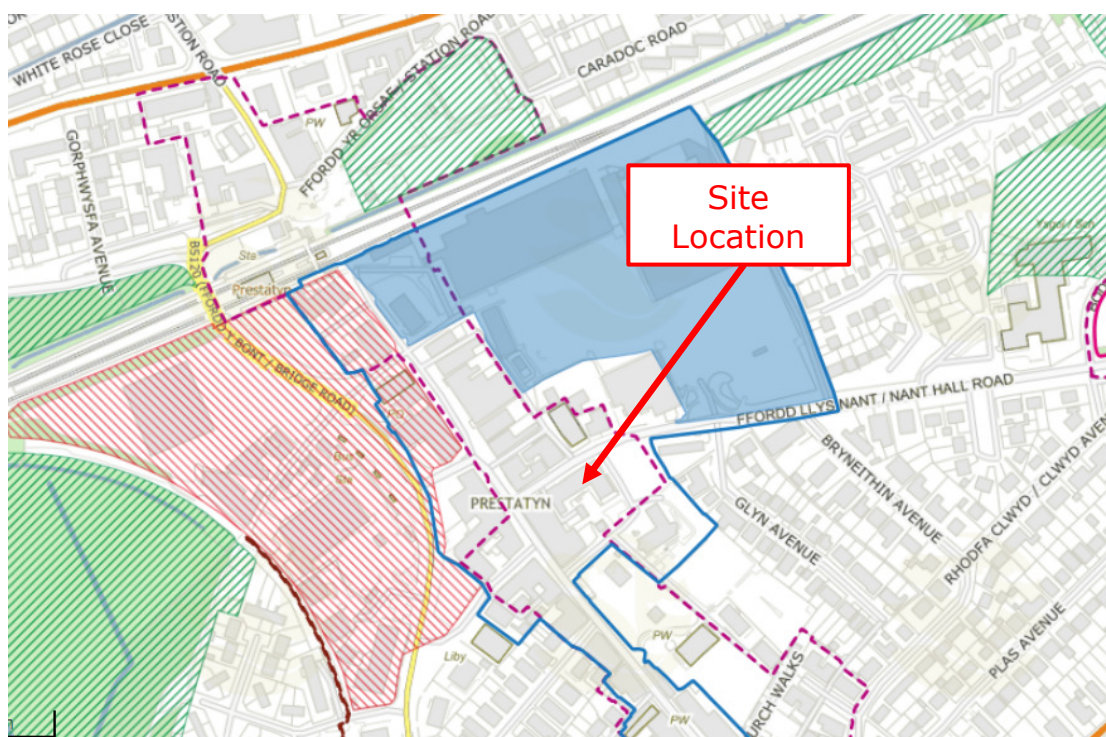


Fig. 15 Proposals Map [Source: Denbighshire County Council]

- 7.5 As indicated above, on the Local Plan Proposals Map, the application site has the following designations:
- RD1 – Development Boundary
 - CON – Conservation Area
 - PSE8 – Town Centre Boundary

7.6 Policy RD1 – Sustainable development and good standard design

Development proposals will be supported within development boundaries provided that all the following criteria are met:

- i) **Respects the site and surroundings in terms of the siting, layout, scale, form, character, design, materials, aspect, micro-climate and intensity of use of land/buildings and spaces around and between buildings;** and
- ii) Makes most efficient use of land by achieving densities of a minimum of 35 dwellings per hectare for residential development (unless there are local circumstances that dictate a lower density).
- iii) **Protects and where possible enhances the local natural and historic environment;** and
- iv) **Does not unacceptably affect prominent public views into, out of, or across any settlement** or area of open countryside; and
- v) **Incorporates existing landscape or other features, takes account of site contours and changes in levels and prominent skylines;** and
- vi) **Does not unacceptably affect the amenity of local residents, other land and property users or characteristics of the locality by virtue of increased activity, disturbance, noise, dust, fumes, litter, drainage, light pollution etc., and provides satisfactory amenity standards itself;** and
- vii) **Provides safe and convenient access for disabled people, pedestrians, cyclists, vehicles and emergency vehicles together with adequate parking, services and manoeuvring space.** Proposals should also consider impacts on the wider Rights of Way network surrounding the site; and
- viii) **Does not have an unacceptable effect on the local highway network as a result of congestion, danger and nuisance arising from traffic generated and incorporates traffic management/calming measures where necessary and appropriate.** A transport assessment and travel plan will be required where appropriate; and
- ix) Has regard to the adequacy of existing public facilities and services; and
- x) Does not prejudice land or buildings safeguarded for other uses, or impair the development and use of adjoining land; and

- xi) Satisfies physical or natural environmental considerations relating to land stability, drainage and liability to flooding, water supply and water abstraction from natural watercourse; and
- xii) **Takes account of personal and community safety and security in the design and layout of development and public/private spaces and has regard to implications for crime and disorder;** and
- xiii) **Incorporates suitable landscaping measures, including where appropriate hard and soft landscaping treatment,** the creation and/or protection of green and blue corridors, mature landscaping, and arrangements for subsequent maintenance. Landscaping should create a visually pleasant, sustainable and biodiversity rich environment that protects and enhances existing landscape features and also creates new features and areas of open space that reflect local character and sense of place; and
- xiv) Has regard to the generation, treatment and disposal of waste.

Commentary

Aligned with the above, the proposed development respects the site and surroundings in terms of the siting, layout, scale, form, character, design, materials and use. This is explored further in the design and access chapter of this statement. The proposal is a distinctive yet sensitive response to the existing built development both on site and in the surrounding area. On this basis, the proposal will not negatively impact the historic environment characterised by the Conservation Area within which it is sited, along with nearby listed buildings. Whilst the extension is 5no storeys, this takes advantage of existing topography on site which slopes up to the existing building and highway and therefore appears more modest from external view. It is proposed that the development will not result in significant highway movements, with a focus on its highly sustainable location and choice of transport modes.

On the basis of the above, the scheme before you is a well-considered design and aligns with the principles of Policy RD1.

- 7.7 **Policy RD5 – The Welsh language and the social and cultural fabric of communities**, states that in determining all planning applications, the needs and interests of the Welsh language will be taken into account. Development could be refused if its size, scale or location would cause significant harm to the character and language balance of a community.

Commentary

A community linguistic statement is appended to this planning application. In preparing the proposed development, due consideration has been given to any effects of the proposal on the Welsh language. The proposal will not negatively impact the use of the Welsh language and will introduce a range of social and economic benefits to the area. This is set out in detail in the separately submitted Community Linguistic Impact Statement. On this basis, the proposed development is compliant with Policy RD5 of the Local Plan.

7.8 **Policy BCS1 - Growth Strategy for Denbighshire**

New housing within the County will be required to meet the needs of local communities and to meet projected population changes. Developers will be expected to provide a range of house sizes, types and tenure to reflect local need and demand and the results of the Local Housing Market Assessment.

Commentary

The proposal will deliver new housing within the town centre to contribute to the areas provision of apartments. A variety in unit size is shown within the proposed floor plans and schedule of accommodation. The scheme incorporates intermediate housing as an alternative tenure, aligned with the affordable housing requirement (Policy BSC4).

7.9 **Policy BSC2 – Brownfield development priority**

Development proposals in Lower Growth Towns, Llangollen, Rhuddlan and villages with development boundaries as defined in the inset maps will be directed towards previously developed land, except where greenfield land is allocated for development in the Plan.

Commentary

The application site is previously developed land and will make use of an existing building, as well as redeveloping a part of the site with demolition and rebuild of a later extension.

7.10 **Policy BSC4 – Affordable Housing**

All developments of 3 or more residential units are expected to provide a minimum of 10% affordable housing either on site on developments of 10 or more residential units or by way of a financial contribution on developments of less than 10 residential units.

Commentary

The proposed affordable housing strategy is to be accommodated within apartments 1 and 2. The form of affordable housing proposed is intermediate rented housing. This is detailed further at 7.19-7.21.

7.11 Policy BSC7 – Houses in Multiple Occupation & Self-Contained Flats

Proposals which would lead to the creation of Houses in Multiple Occupation or non self-contained flats will not be permitted.

The sub-division of existing premises to self-contained flats will be permitted provided that all the following criteria are met:

- i) the property is suitable for conversion to the number and type of flats proposed without unacceptably affecting the character, appearance and amenity standards of the locality (including cumulative effects of such proposals); and
- ii) the proposal conforms to the Council's approved space and amenity standards.

Commentary

The proposed development is aligned with BSC7, the conversion of the building to self-contained flats can be delivered without detriment to the character, appearance and amenity standards of the locality. This is explored in detail in the design and access chapter. The proposed units have considered the Council's space standards, as detailed at 7.22-7.25.

7.12 Policy PSE8 – Development within town centres

Development proposals within town centres defined on the proposals maps will be permitted provided that all of the following criteria are met:

- i) they enhance the vitality and viability of the town centre and
- ii) they do not result in an unacceptable imbalance of retail and non retail uses
- iii) within the primary shopping frontage of Rhyl the change of use of ground floor retail premises (A1 shops) to any other use class will be resisted.

Commentary

The proposed development is aligned with PSE8, the redevelopment of the building in the town centre will facilitate regeneration and improve vitality and viability, making best use of an underutilised asset. The development will not impact the balance of retail and non-retail uses, converting an office space to residential, holiday let and café, retaining a small area of office hub.

7.13 **The Visitor Economy** Chapter sets out that:

The visitor economy is valuable to Denbighshire and contributes around £250 million² to the economy annually and employs around 5,000, approximately 10% of the workforce, making it one of the key employment sectors for the County.

Commentary

The proposed development will contribute toward the visitor economy, notably within Prestatyn. The central location will contribute to use of services and amenities within Prestatyn and the wider Denbighshire area.

7.14 **Policy VOE5 – Conservation of Natural Resources**, sets out that:

“Development proposals that may have an impact on protected species or designated sites of nature conservation will be required to be supported by a biodiversity statement which must have regard to the County biodiversity aspiration for conservation, enhancement and restoration of habitats and species.

...

Planning permission will not be granted for development proposals that are likely to cause significant harm to the qualifying features of internationally and nationally designated sites of nature conservation, priority habitats, priority species, regionally important geodiversity sites, or to species that are under threat.”

Commentary

A Preliminary Ecological Appraisal has been undertaken by Sambrook Associates. The appraisal concludes that the Site is of potential ecological value to bats and birds but no evidence of other protected, notable or invasive species was identified within the Site during the surveys. Bat surveys are scheduled to between May and June. Following the result of the surveys, appropriate mitigation will be agreed, if required.

7.15 **Policy VOE6 – Water Management**, highlights that all development will be required to eliminate or reduce surface water run-off from the site, where practicable. The run-off rates from the site should maintain or reduce pre-development rates. Further to this, all major development proposals should be accompanied by a Water Conservation Statement.

Commentary

A Drainage Strategy has been prepared by JPS.

7.16 **Policy ASA3 – Parking Standards**, states that development proposals will be expected to provide appropriate parking spaces for both vehicles and bicycles.

Commentary

The proposed development has considered the Council's parking standards in full. An assessment of the standards is set out below at 7.26-7.29.

7.17 *It is presented that the proposed development is supported by the policies and principles of the adopted Development Plan, as it seeks to deliver upon redeveloping a prominent town centre site which is currently underutilised. The scheme will introduce new residential units to the town centre, as well as holiday lets and commercial space.*

SUPPLEMENTARY GUIDANCE

7.18 The Council has adopted a suite of Supplementary Planning Guidance Notes (SPGs) which amplify development plan policies and provide further information and guidance to developers. The following SPGs would apply for the site and have been considered in designing the development:

- Access for all
- Affordable Housing
- Conservation and enhancement of biodiversity
- Conservation Areas
- Parking Requirements in New Developments
- Planning and the Welsh language
- Planning for Community Safety
- Planning Obligations
- Recreational Public Open Space
- Residential Development
- Residential Development Design Guide
- Residential Space Standards
- Trees and Landscaping

AFFORDABLE HOUSING

7.19 The affordable housing SPG provides further advice and guidance on how affordable housing is to be delivered on new residential schemes.

7.20 The SPG defines various forms of affordable housing. The document has been considered in detail in devising the appropriate provision and management to deliver the affordable housing on site. in line with Policy BSC4, 10% of the residential units must be for affordable housing. This equates to 2no units.

7.21 The units proposed to be allocated for such are apartments 1 and 2 at the first floor.

The appropriate form of affordable housing proposed in this case is intermediate rent, defined within the SPG as follows:

Intermediate housing:

- Housing where prices/rents are above those of social rented housing, but below market housing prices/rents
- Can include shared equity/ownership schemes and intermediate rent housing
 - The purchase price for affordable housing will be calculated using the calculation in Appendix 2
 - **Intermediate rent levels should be no greater than 80% of market rents for comparable properties in the local (i.e. town/community council) area, including any service charges.**

7.22 The affordable housing provision is to be managed by the private landlord (Nant Hall Developments Ltd), in line with the above, set at 80% of marked rents.

PARKING REQUIREMENTS IN NEW DEVELOPMENTS

- 7.23 The Council's parking requirements supplementary planning document details the target parking provision for various uses. The parking standards have been considered in detail and the site has been utilised to provide the maximum quantum of car parking spaces possible.
- 7.24 Whilst the proposed number of car parking spaces falls marginally below the requirement, this is justified on the basis that the site is in a highly sustainable location within the centre of Prestatyn. The site is served by all sustainable transport modes and services/amenities are accessible within the town centre.
- 7.25 The scheme will encourage use of sustainable transport aligned with the Council's climate emergency.
- 7.26 Further to this, there is insufficient space within the site to accommodate further car parking. Due to the central town location, it is proposed that public car parks would be utilised by users of the commercial units and visitors. Aligned with this, many of who would be expected to come from the town centre utilising sustainable transport modes, as opposed to the private car.
- 7.27 All holiday lets will have a designated car parking space. The vast majority of residential units will have parking, to be allocated on a case-by-case basis in line with tenancy. The expectation is that some tenants may not have (need or want) a car, living in the central location. When signing up for tenancy, residents will be aware as to whether there will be a space(s) available to them.

RESIDENTIAL SPACE STANDARDS

7.28 The Residential Space Standards SPG sets out County-wide minimum floor space standards. These are set out below:

5. Standards

5.1 The requirements in this section apply County-wide to private and affordable housing. A developer checklist is included within Appendix 1 which summarises the standards.

Minimum Floor Space Standards

5.2 Minimum floor space standards, including circulation space, for all dwellings are set out below:

Property Size	Minimum Gross Internal Area (GIA) in Square metres to the nearest metre
1 bed	50
2 bed	65
3 bed	80
4 bed and more	100

5.3 The space standards are applied to both new build and conversion of existing properties. It is acknowledged that it may not be possible to achieve the standards in all conversions. In exceptional circumstances, (where it can be demonstrated that the application of the standards would affect the viability of the scheme and such a scheme is vital to the Council's overarching regeneration priority OR in relation to a historic or listed building where the historical merit of the property would be undermined.), the Council may grant planning permission providing the overall quality of the accommodation is not compromised. In such cases developers should liaise with the Planning Department.

7.29 The Welsh Government space standards for affordable housing have also been considered in devising the requirements for the various unit sizes and tenure. These are extracted as follows:

Appendix B

Floor Areas

Home Designation	Home Type	Gross Internal (floor) Area (GIA) m2	General Storage m2 (included in GIA)
7P4B	2 Storey House	114	3
6P4B	2 Storey House	110	3
5P3B	2 Storey House	93	2.5
4P3B	2 Storey House	88	2.5
4P2B	2 Storey House	83	2.5
3P2B	2 Storey House	74	2
3P2B	Bungalow	58	2
3P2B	Flat – Walk up	65	2
3P2B	Flat – Common access	58	<u>2</u>
2P1B	Flat – Walk up	53	1.5
2P1B	Flat – Common access	50	1.5

Provided that designs do not compromise the quality of homes intended to be delivered by this standard, a reduction of up to 5% of the above GIA may be applied.

- 7.30 The Welsh Government space standards are applied in relation to apartments 1 and 2, being the units proposed as affordable (intermediate rent).
- 7.31 The Council’s Residential Space Standards SPG is applied to all other units. All other units except for units 7 and 13 meet the Council’s space standards, which have a small discrepancy at 61m² and 63m² for 2-bedroom apartments, with the SPG requirement defined at 65m².
- 7.32 This small discrepancy is considered acceptable on the basis that the units are working within the confines of the existing building and the quality of the living accommodation will not be compromised. It is noted that the SPG acknowledges that:

“it may not be possible to achieve the standards in all conversions. In exceptional circumstances, (where it can be demonstrated that the application of the standards would affect the viability of the scheme and such a scheme is vital to the Council’s overarching regeneration priority OR in relation to a historic or listed building where the historical merit of the property would be undermined.), the Council may grant

planning permission providing the overall quality of the accommodation is not compromised. In such cases developers should liaise with the Planning Department.”

- 7.33 The priority is to retain this part of the original building and maximising units is critical to delivering a viable regeneration scheme. The redevelopment of the site is a priority for the Council as specified within the Nant Hall Development Brief. With the above in mind, the minor shortfall of 2m² and 4m² should be considered acceptable.

8.0 OTHER MATERIAL CONSIDERATIONS

FLOOD RISK

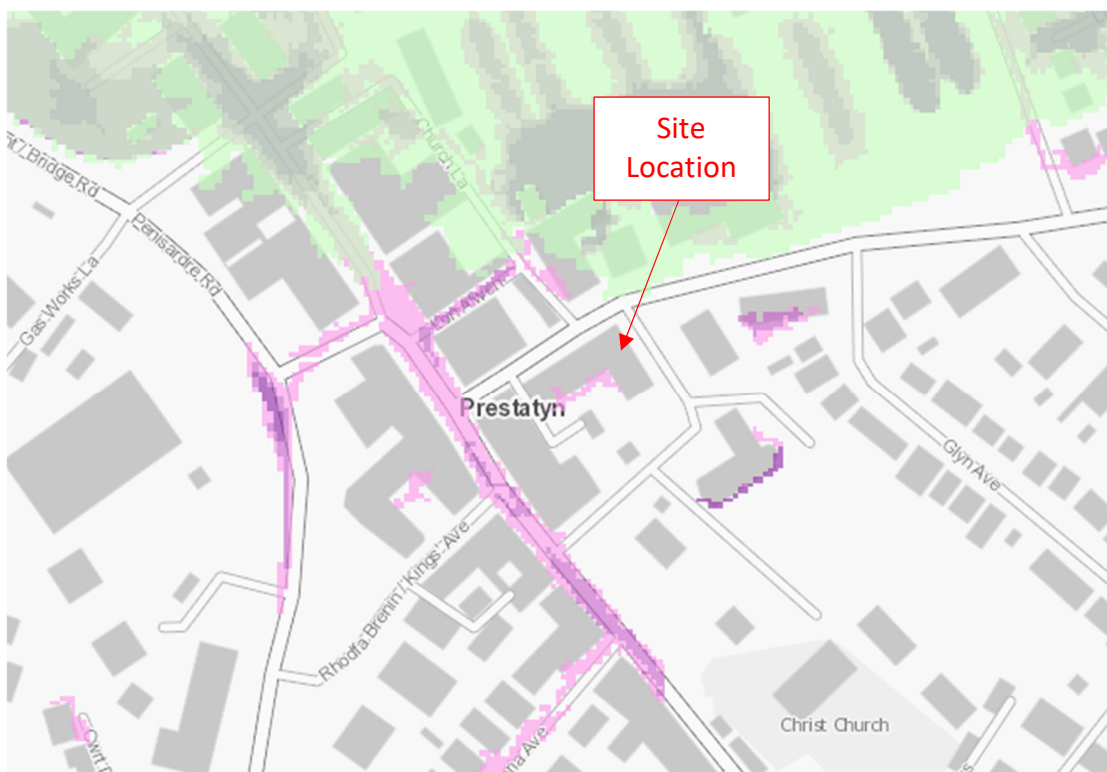


Fig. 16 Flood Risk Map [Source: Natural Resources Wales]

- 8.1 As demonstrated by Figure 16, the site is located in a low flood risk area.
- 8.2 A Flood Consequence Assessment has been undertaken by Ymgynghoriaeth Gwynedd Consultancy (YGC).
- 8.3 The FCA concludes the following:
 - The proposed development lies within a tidal TAN15 defended zone
 - The Defended T200 PD, T1000 PD & T200 CC 2122 scenarios demonstrate that the proposed development would be unaffected by floodwater. This demonstrates compliance with TAN15, section A1.14.
 - For the worst-case breach scenario – Ffrith Beach - which follows NRW’s latest breach guidelines (i.e. 50 m breach width), the site would be unaffected by floodwater in the T200 CC 2117 scenario. This demonstrates compliance with TAN15, section A1.14.

- The new development is at a low risk of flooding – with flooding only occurring in the extreme Defended T1000 CC 2117 event – maximum 0.20 m of flood depth at the building. Section A1.15 of TAN15 notes that flooding up to 0.60m may be allowable during the T1000 event, therefore this demonstrates compliance with TAN15, section A1.15.
- Flood free access/egress via the car park to the south is available in all T200 and T1000 tidal scenarios when considering a development lifetime of 100 years. This includes the T200 CC 2117 Ffrith Breach. This demonstrates compliance with TAN15, section A1.15.
- The proposed development will occupy a similar footprint to the existing building, and the additional extension will be developed on an existing impermeable surface. It can therefore be assumed there will be negligible risk of flooding elsewhere. This demonstrates compliance with TAN15, section A1.12.

DRAINAGE

- 8.4 A Drainage Strategy has been prepared by JPS, which details the existing and proposed foul and surface water drainage strategy for the site.
- 8.5 The site benefits from existing connections to the public sewer network for both foul and surface water. The existing connection outfall
- 8.6 A new separate foul drainage system is designed to serve the proposed development and connected to the existing foul network serving the site.
- 8.7 The surface water drainage scheme includes cellular attenuation storage beneath the car park and permeable paving, which will connect to the existing surface water drain.
- 8.8 The sustainable drainage scheme has been designed and in accordance with Statutory SuDS Standards and a SAB application will be made in due course.

HISTORICAL PROTECTIONS



Fig. 17 Historic Protections [Source: CADW]

- 8.9 Figure 13 demonstrates that there are no historical protections on the site itself. That being said, the Grade II listed Christ Church Vicarage is located circa 50m to the south.
- 8.10 Further to this, the site is situated within the Prestatyn High Street Conservation Area.
- 8.11 The separate Heritage statement concludes that the development will redevelop a low value part of the site which is not original and does not currently contribute to the conservation area's character or appearance. The principal elevation onto Nant Hall Road will be retained as a historical building in the town with a modern redevelopment to the rear.
- 8.12 The Heritage Statement considers all heritage assets within the wider surrounding area and notably the views to / from the site and these assets.
- 8.13 The Assessment confirms that the proposed development would not have a detrimental impact on the setting of the Conservation Area or nearby Christ Church Vicarage.

ECOLOGY

- 8.14 The Preliminary Ecological Appraisal undertaken by Sambrook Associates concludes that the external areas of the site offer very low value habitat.
- 8.15 The appraisal concludes that the Site is of potential ecological value to bats and birds but no evidence of other protected, notable or invasive species was identified within the Site during the surveys. Bat surveys are scheduled to be between May and June. Following the result of the surveys, appropriate mitigation will be agreed, if required.
- 8.16 It is the intention of the design team to deliver a net gain in biodiversity value in developing the site. This is detailed in Sambrook Associates Green Infrastructure Statement.

ACOUSTICS

- 8.17 An environmental sound survey and acoustic report has been undertaken by Lighthouse Acoustics.
- 8.18 The report concludes that noise levels can be achieved within the acceptable limits, subject to mitigation measures, in the form of acoustic specifications for glazing/ventilation elements.

TREES

- 8.19 There are 2 no trees on site, which are located to the rear (south) of the site within the parking area.
- 8.20 A tree survey for the area (covering the application site) was undertaken on behalf of Denbighshire County Council in 2014 when preparing the Nant Hall Road Development Brief. This tree survey is appended to the application.
- 8.21 An updated Tree Survey and Arboricultural Impact Assessment has been undertaken by Tree Solutions, in regard to the proposed development before you.
- 8.22 The 2 no trees within the rear car parking court are proposed to be removed to facilitate the development, required levels and car parking. As demonstrated through the updated tree survey, the trees are in an inhospitable environment for their type and have a potentially limited future life.

- 8.23 Proposed removal of the 2no trees is to be mitigated through introducing new trees/planting within the landscape area, which will provide established trees as replacement. The trees will benefit the Conservation Area and setting of the Vicarage, suitably mitigating loss of the existing trees on site and delivered in a means which secures their ongoing prosperity.
- 8.24 This strategy is considered an acceptable form of mitigation as detailed within the Tree Survey / AIA. Further to this, the priority to redevelop the site is detailed within the Council’s own Nant Hall Development Brief. It is noted as below T17 (Sycamore) is to be retained ‘if possible’. In order to deliver the scheme including demolition of the previous extensions, replacement with new and landscaping/car park works, works within the roof protection area are unavoidable. As a result, removal is necessary, mitigated through the above.

Figure 2a

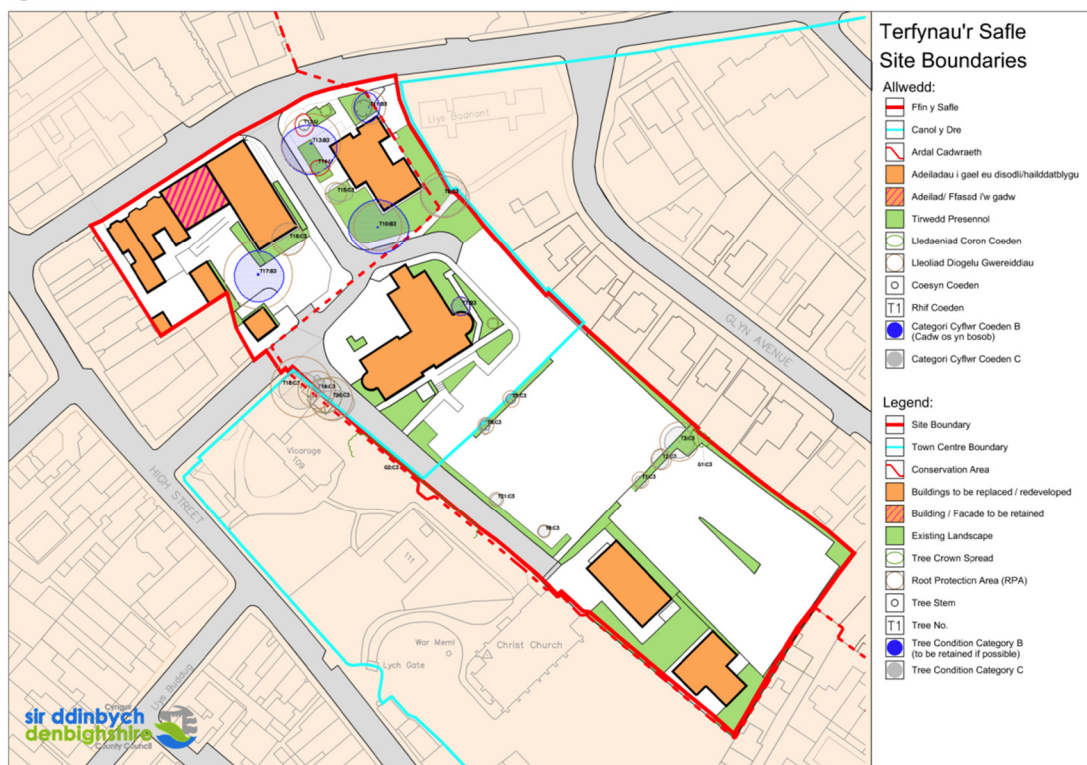


Fig.18 Extract from Nant Hall Development Brief [Denbighshire County Council]

TRANSPORT AND HIGHWAYS

- 8.25 The supporting documentation concludes that the site is located within an area which has a range of existing local facilities and services in its immediate vicinity. All necessary facilities can be accessed via walking within the town centre, which is also well served by sustainable

- travel choices. The site is an existing established site which has previously accommodated a large number of people as office space.
- 8.26 The site is located within a highly sustainable location, within the town centre of Prestatyn in immediate vicinity of sustainable transport modes (Prestatyn Railway Station and Bus Station).
- 8.27 The site benefits from an existing car park with 7no spaces. The proposal involves restructuring the landscaping area and maximising opportunities for parking, resulting in a proposal for 24no spaces.
- 8.28 Whilst the proposed number of car parking spaces falls marginally below the requirement set out within the Council's parking standards, this is justified on the basis that the site is in a highly sustainable location within the centre of Prestatyn and served by sustainable transport modes.
- 8.29 All holiday lets will have a designated car parking space. The vast majority of residential units will have allocated parking, to be allocated on a case by case basis in line with tenancy. The expectation is that some tenants may not have (need or want) a car, living in the central location. When signing up for tenancy, residents will be aware as to whether there will be a space(s) available to them.
- 8.30 The scheme will encourage use of sustainable transport aligned with the Council's climate emergency.
- 8.31 Further to this, there is insufficient space within the site to accommodate further car parking. Due to the central town location, it is proposed that public car parks would be utilised by visitors.

AFFORDABLE HOUSING

- 8.32 The proposed affordable housing strategy is to be accommodated within apartments 1 and 2. The form of affordable housing proposed is intermediate rented housing.
- 8.33 Affordable housing is to be managed by the private landlord (Nant Hall Developments Ltd), in line with the above, set at 80% of marked rents.

9.0 CONCLUSIONS

- 9.1 Cassidy and Ashton make this Full Planning Application (with demolition in a Conservation Area) on behalf of Nant Hall Developments Ltd.
- 9.2 The proposed development seeks the conversion and part redevelopment of the site to provide a mixed-use scheme of residential, holiday lets and commercial space. The building is a vacant town centre asset which has previously been used as Council Offices, following its historic operation as a fire station.
- 9.3 Consideration has been given within this document to all relevant planning policies and guidance, concerning a range of matters; the principle of development; design and amenity; environmental considerations, accessibility and car parking and the Welsh language.
- 9.4 This Statement concludes that the proposed development represents the delivery of a regeneration initiative in Prestatyn Town Centre and will therefore contribute to the prosperity of the town.
- 9.5 It is acknowledged that the proposed development site is identified for redevelopment opportunity within the Nant Hall Development Brief. The proposed development before you seeks to deliver on the intentions of the development brief.
- 9.6 This Statement, read in conjunction with the planning application pack as a whole presents the proposed development in detail, which has been designed with the central aim to deliver a regeneration opportunity which is a prominent new addition, whilst suitably complementing and respecting existing build form on site, the Conservation Area and nearby listed buildings.

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