

Preliminary Design & Access Statement

Llys Anwyl, Churton Road, Rhyl,
Denbighshire LL18 3NB

Redevelopment of existing offices to provide 12
self contained apartments



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1. Introduction

- 1.1.1. This report aims to demonstrate how the principles of good design have been considered in the proposed redevelopment of the offices at Llys Anwyl to provide good quality, sustainable housing that responds to the needs of the community.
- 1.1.2. The Single Housing Register for Denbighshire has identified Rhyl as having the highest unmet need for social housing in the county. The requirement for smaller accessible homes to meet the needs of an ageing population is particularly strong in Rhyl and will grow further as existing provision needs improvement or replacement. The current supply of this type of accommodation in the town is very limited. The redevelopment of the offices at Llys Anwyl would help towards satisfying this requirement.

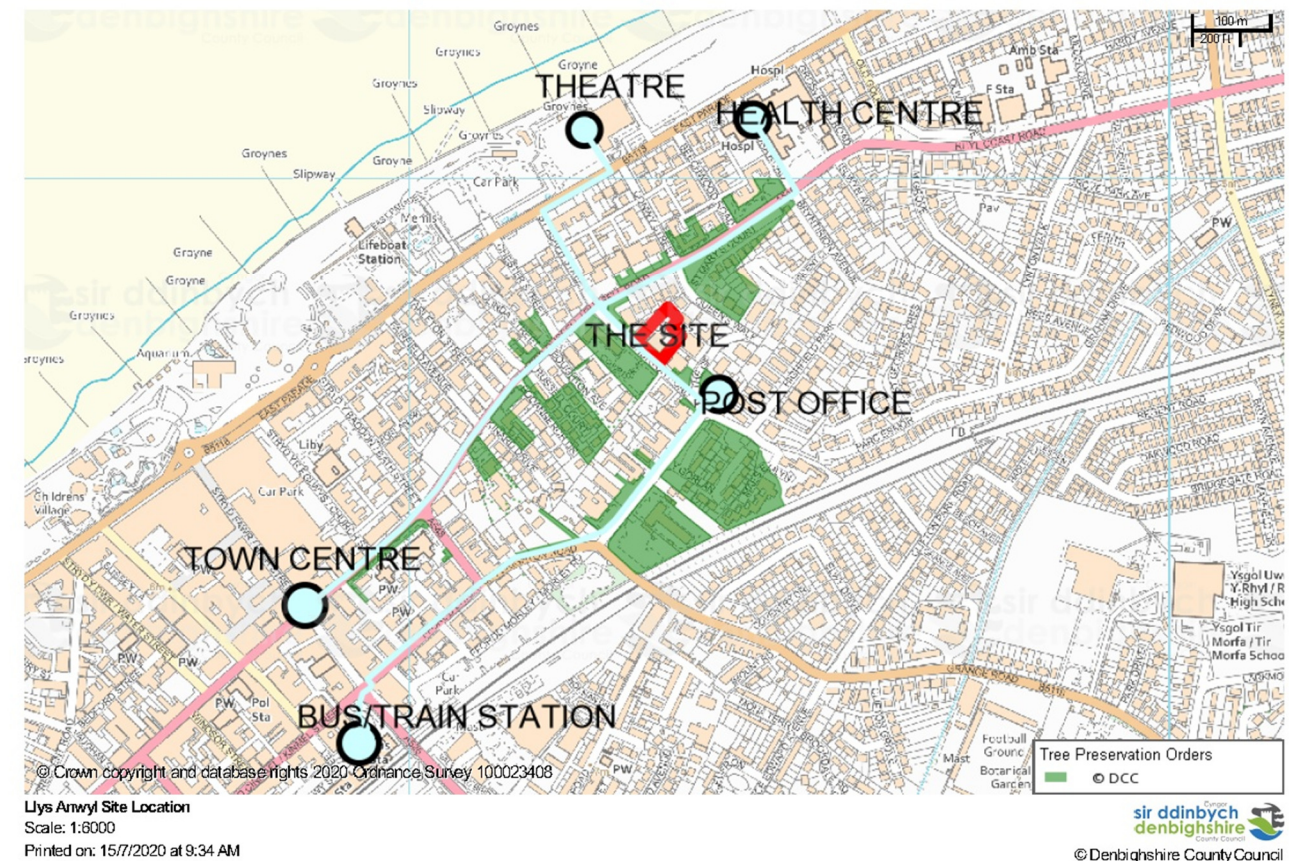
2. Site and Context Analysis

2.1. Vision for the development

- 2.1.1. The authority has identified the property as having potential for redevelopment as residential accommodation and has undertaken technical analysis of the building to determine its suitability, including structural, energy, acoustic and fire assessments that have confirmed that the property is suitable for conversion.
- 2.1.2. The most significant alteration to the existing building is the proposed demolition of the two storey portion of the building that extends into the car park to the rear. This is to allow the subdivision of the remaining building into apartments that are not of excessively deep plan so that they can be adequately lit by natural light from existing and new window openings. It also enables the opening up of the space to the rear of the building to allow more natural light and the creation of a new amenity area.

2.2. Site Information

- 2.2.1. The existing site consists of 1036sqm (11,161sq ft) of commercial offices located over three storeys fronting onto Churton Road with associated car parking to the rear resulting in a site of approximately 0.2 Hectares (0.51 acres).
- 2.2.2. Vehicular access to the site is from Churton Road via a two way access driveway adjacent to the south western boundary of the site and is controlled by automatic vehicle control barriers.



Site Location Map

- 2.2.3. The location map indicates that the site is very well located to provide pedestrian access to a range of facilities.
- 2.2.4. The map also shows that the site is located in an area that is covered by a number of Tree Preservation Orders. Within the site the trees on the site frontage are covered

by the preservation order and are a feature that it is intended to preserve but this does have implications for the drainage strategy outlined in Section 4 of this report.

2.2.5. Currently the majority of the rear of the site is taken up by tarmacadam hard-standing forming the car park with a combination of brick walls and hedges forming the boundaries.



Aerial View of Proposed Site © Google 2019

2.2.6. Further information is provided within the Preliminary Ecological Report and the Arboricultural Report included in this submission.

2.2.7. The site is not identified on Natural Resources Wales mapping as an area subject to flood risk.

2.3. Character

2.3.1. The site is located on a tree lined, predominantly residential street and the original building, which was built around 1990, has been designed to fit into the residential setting with its mass and scale reduced by the use of mansard roof and roof dormers. The building is already domestic in character and significant changes to the elevations are not proposed.

2.3.2. At the level of the mansard roof it is proposed to introduce one larger dormer to the living area of each flat to provide more light and a better view out from living areas. The new dormers will be similar in style to the smaller existing dormers.

2.3.3. Windows will be replaced throughout because the existing timber windows are in poor repair. The new windows will be more energy efficient and will incorporate smaller opening lights to provide supplementary natural ventilation. There is a mix of fenestration styles on Churton Road and this change will not adversely affect the character of the street.

2.4. Constraints/Opportunities

2.4.1. The main constraint on development is the existing building structure but that has also created the opportunity to provide a sustainable residential building without the waste involved in the complete demolition of the existing structure.

2.5. Planning Policy

2.5.1. This section demonstrates how the proposed development aligns with policies in Denbighshire County Council's current Local Development Plan.

2.5.2. Policy RD1 – Sustainable Development and Good Standard Design

The proposed development is generally compliant with policy RD1

- i) It respects the site and surroundings as indicated under the headings in this report
- ii) It achieves a density greater than 35 dwellings per hectare
- iii) It does not have an impact on the local natural or historic environment
- iv) It has no impact on prominent public views
- v) It has no impact on existing landscape or other features
- vi) It does not unacceptably affect the amenity of local residents – if anything it improves amenity
- vii) It provides safe access and convenient access for disabled people, pedestrians, cyclists, vehicles and emergency vehicles and is compliant with parking standards
- viii) It does not have an unacceptable effect on the local highway
- ix) It has regard to the adequacy of existing public facilities and services
- x) The site is not safeguarded for a particular use although the proposed development will result in the loss of a building for employment use and this is considered in the context of policy PSE3 in section 2.5.5. The proposed use will not impair the use of adjoining land which is all developed for residential uses which are either individual dwelling houses or residential institutions.
- xi) There are no issues relating to land stability, drainage, flooding or water abstraction
- xii) Personal security and community safety have been taken into account in the design of the public/private spaces
- xiii) The opportunity has been taken to enhance the existing landscaping and take into account biodiversity
- xiv) Waste disposal has been considered and will be via connection to existing site drainage feeding into the public sewer.

2.5.3. Policy BSC 1- Growth Strategy for Denbighshire

This policy requires that any new housing meets the needs of local communities and projected changes in population.

Rhyl has been identified in the policy as a “lower growth town” where residential developments will provide for housing and employment needs primarily to meet local demand. The number of completions envisaged from new allocations and existing commitments was 723 units. However, this included 230 units at the Ocean Plaza site which has subsequently been built out exclusively as a retail development. The number of completions and build rates anticipated have not been realised and there is therefore an on-going requirement for additional housing to meet identified need.

The policy expects developers 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.

The proposed development is located in the Rhyl East ward.

Over the decade leading up to the 2011 census, the number of households in the ward had actually declined by 33 to 1,975.

According to data from CACI, by 2019 median household incomes in the ward had recovered to pre-credit crunch levels but were still some 13.5% below those for the county as a whole at £23,705 per annum and just under 40% of households were eligible for social housing with an income below 60% of the average for Great Britain.

The ward has a relatively high age profile with 29% of households aged 65 or over compared with a figure of 20% for Rhyl and 21% for Denbighshire. Households tend to be smaller than in the town as a whole with 75% comprising one or two persons in the Rhyl East ward compared with 68% in the whole of Rhyl.

Analysis of the Single Housing Register for Denbighshire shows a strong preference for one bedroom flats or bungalows expressed by applicants seeking social rented accommodation in Rhyl with 232 looking for one bedroom flats in July 2020.

The population of the Rhyl East ward is skewed towards older, smaller households and income levels are significantly lower than in Denbighshire as a whole. There is a significant proportion of households in the ward who are eligible for social housing and

a high number of applicants for social housing in the town are seeking one bedroom flats or what would previously be regarded as “sheltered” homes suited to over 55s.

With the number of new homes being completed in the town falling below expectations in the plan and an unmet need for smaller social rented homes suited to older residents, the proposed conversion of Llys Anwyl to provide this type of accommodation in the Rhyl East ward represents an excellent opportunity to contribute towards addressing these needs.

2.5.4. Policy BSC 11 – Recreation and Open Space

The proposed development incorporates the amenity space required by Denbighshire County Council Supplementary Planning Guidance – Residential Space Standards.

2.5.5. Policy PSE3 – Protection of Employment Land and Buildings

2.5.6. This policy requires proposals which would result in the loss of employment land or buildings to satisfy three criteria before they can be supported.

i. **The first criterion is that there are no other suitable sites available for this development.**

Twelve sites were allocated for residential development in the town.

Of these;

- seven have either been completed or are currently under development;
- two have been retained in other uses; and
- one (the former Northgate School site in Russell Road) remains undeveloped but is understood not to be currently marketed for sale and in any event is smaller in area than the application site so may be unable to deliver as many units.

Whilst the remaining two allocated sites (85-90 West Parade and 93-100 West Parade), unlike the other cleared seafront site which is available for development at 50-56 West Parade, are not situated within the area specifically covered by the West Rhyl Regeneration Area Supplementary Planning Guidance, they are also located

in the Rhyl West ward. The Council's aim to provide a wider range of housing tenures in the ward expressed in this Supplementary Planning Guidance with the intention of addressing the intense levels of deprivation, which remain stubbornly present throughout the ward, would be at variance with developing these sites for social rented accommodation.

There is however under used space particularly above shop units in the town centre which would be suitable for conversion into apartments and the applicant is currently undertaking a number of these conversions. The predominance of former Victorian town houses in this area with a relatively small footprint either prevents the installation of lifts or makes such installations financially unviable so they are generally unsuitable for the provision of accessible apartments to meet the need identified. Furthermore, the Town Centre Vision aims to turn the town centre into a place where more people want to live whilst at the same time bringing back a wider range of customers with high disposable incomes and greater spending power which limits the opportunity for providing more homes for social rent in this location.

ii. **The second criterion is that a continuous marketing process of one year, alongside all practical attempts possible to retain the employment use, has demonstrated that the site or premises is no longer capable of providing an acceptable standard of accommodation for employment purposes.**

The closure of the office of the UK central government agency which previously occupied the building was announced in November 2017. The landlord immediately gave a joint instruction to the two leading commercial estate agents operating in the region to find new tenants or owners. During the two and a half years that the property has been on the market, apart from the applicant's offer, only one other was received and that sale subsequently fell through.

The Member of Parliament for the Vale of Clwyd constituency even tabled a question in the House of Commons in an attempt to retain the previous use but the response from HM Treasury was that, "Our estates programme is transforming the way we use our offices to support new and more efficient ways of working. It balances

affordability, a range of working styles and geographic coverage. It will support our people adapt to a more flexible way of working, delivering our business in a more cost-effective and sustainable way."

iii. The third criterion is that the loss of the site or premises would not prejudice the ability of an area to meet a range of local employment needs or the proposal involves the satisfactory relocation of a non-conforming use from an unsuitable site.

Demand for medium sized office premises in Rhyl has been weak for some time with occupiers favouring purpose built premises with dedicated parking and immediate access to the trunk road network afforded by St Asaph Business Park.

The few requirements for office space in the town itself have originated in the main from public sector clients and to a lesser extent from a limited number of regional businesses requiring a base in the area but with the appetite for agile working growing as a consequence of the global pandemic, demand is expected to decline further with the strong possibility that premises which are currently occupied will come back on the market.

In the inspector's report in relation to appeal APP/R6830/A/16/3147438 against the refusal of Planning application 43/2014/1166 which would have resulted in the loss of employment land and buildings at Warren Drive in Prestatyn, he concluded that premises which were available at St Asaph Business Park were sufficiently close to the application site to meet the needs of the area. Warren Drive is 10 miles away from the Business Park and the journey time calculated by the AA Route Planner is 18 minutes. The application site in Churton Road is 7 miles from the Business Park and the journey time is 12 minutes. It would therefore seem reasonable to conclude that premises available at the Business Park would also be able to meet any needs for office accommodation in Rhyl.

Potential capacity at the Business Park on the date of the application includes;

- up to 120,000 sq ft at the New Vision development;
- up to 250,000 sq ft at the Vista development; and

- 20 acres of Welsh Government land in nine plots which would be large enough to accommodate 40 properties of the size of Llys Anwyl.

In addition to this, there is also office accommodation of a similar size to Llys Anwyl available at the former Kwik Save offices at Warren House in Prestatyn which is 4 miles or 9 minutes away from the application site.

With this significant capacity, the loss of Llys Anwyl would not compromise its ability to accommodate the likely level of need for office accommodation in the area in an era of shrinking demand.

2.5.7. Policy VOE5 – Conservation of Natural Resources

The development will not adversely affect protected species or habitat as indicated in the preliminary ecological assessment included in this submission.

2.5.8. Policy VOE6 – Water Management

The strategy for dealing with water management is explained in Section 4 of this report.

2.5.9. Policy ASA2 – Provision of Sustainable Transport Facilities

Section 6 of this report identifies the good pedestrian links that the development has with facilities and public transport hubs.

Storage has been provided for mobility scooters but this could also be used by more active occupants for cycle storage.

An existing cycle shelter will be retained on the site.

2.5.10. Policy ASA3- Parking Standards

The proposal meets the requirements indicated in Denbighshire County Council's Supplementary Planning Guidance Note as demonstrated in Section 6 of this report.

3. Accessibility

- 3.1.1. Accessibility has been at the forefront of the strategy to refurbish the building.
- 3.1.2. The existing main entrance is already accessible by wheelchair with level access and an automatic door but the demolition of the rear extension to the building has enabled a further accessible entrance to be introduced with two new accessible parking spaces located close to the entrance.
- 3.1.3. Internally the new apartments have been designed following the principles of 'Lifetime Homes' and wherever possible have been designed to comply with Building Regulations Part M4(2) Approved Document (English Version) to make them accessible and adaptable.
- 3.1.4. The existing lift is to be replaced and repositioned to provide wheelchair accessible landings at each level.

4. Environmental Sustainability

Energy Use

- 4.1.1. The proposals have been thermally modelled and a number of options considered for the provision of energy saving measures. Adopting the 'fabric first' philosophy the existing building fabric, ie. walls, windows, roof and ground floor will be upgraded to improve insulation values. It is also proposed to provide an array of solar PV panels over part of the car park.
- 4.1.2. Under current regulations and methods of building energy measurement gas fired boilers are still deemed to be more energy efficient and so heating will be via gas fired boilers with water heating via air source heat exchangers/heat pumps. The heating system will be designed to run at low temperatures so that if/when air source heat pumps become the preferred method of heating the system can be upgraded with the minimum of disruption to the building occupants.

- 4.1.3. Provisional calculations indicate that the building will achieve an EPC 'B' rating.

Embodied Energy

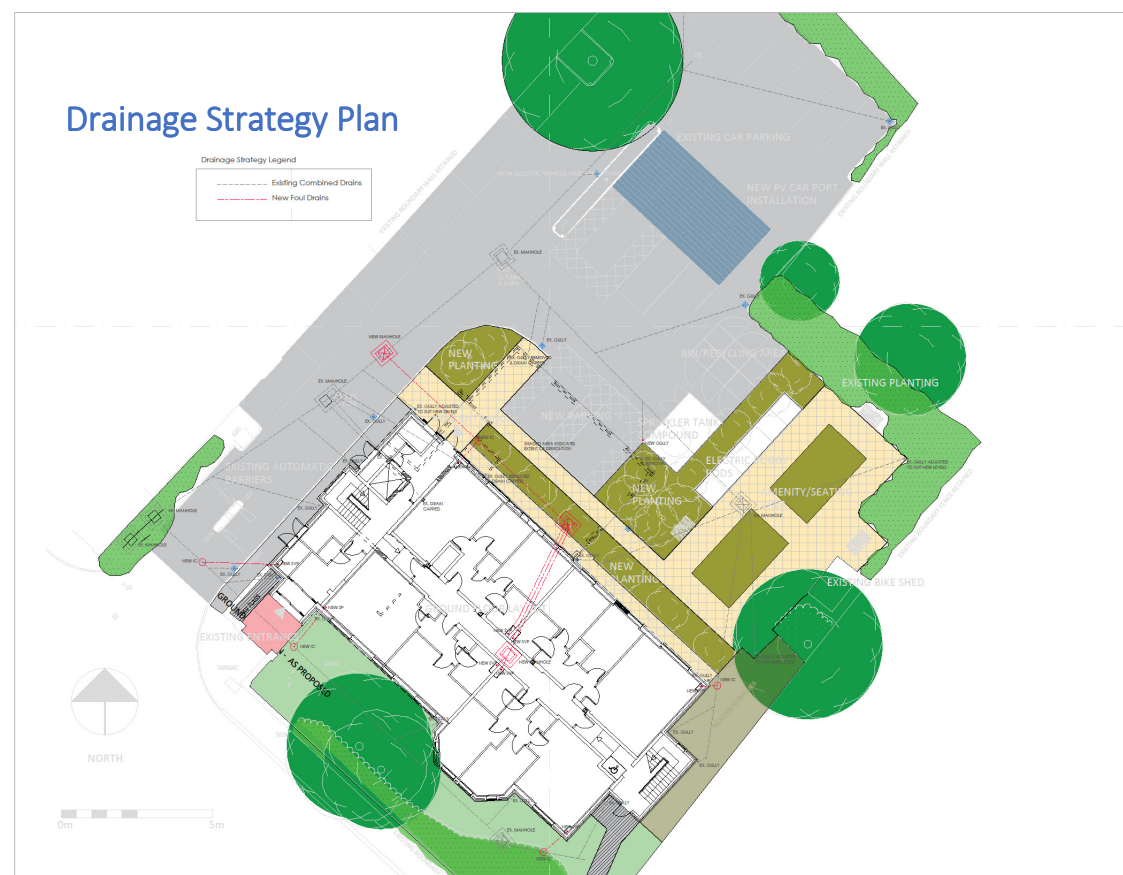
- 4.1.4. It could be argued that the re-purposing of the office building, for which there is little demand under current market conditions, as rented residential use for which there is a demonstrable demand, is a very sustainable form of development. Alterations to the building are being limited to what is required to provide comfortable and energy efficient housing with much of the building fabric, including environmentally damaging concrete foundations and floors retained so that embodied energy is much reduced when compared to a new development.

Ecology

- 4.1.5. As noted in the preliminary ecological report included in this submission it is not envisaged that there will be an impact on protected species but provision will be made to encourage habitation by protected species by the provision of new nest boxes.
- 4.1.6. New soft landscaping, although limited in extent by the constraints of the site will include a diverse range of species to encourage insect life.

Drainage

4.1.7. The strategy for drainage of the site is to make use of the existing combined drainage system installed when the existing building was constructed in 1990.



4.1.8. There will be a net reduction in run-off from the site due to the demolition of the rear section of the existing building and the reduction in size of the hard-standing to the car park. New soft landscaped areas will be introduced to slow run-off from the site.

4.1.9. New foul drainage connections can be connected to the existing combined drainage system on site without impacting on the protected trees to the street frontage. If separate foul and surface water drains were provided within the site the new drains would impact on the root protection zone of the trees to the street frontage which would be undesirable, as indicated in the preliminary arboricultural report included within this submission. The sewer in Churton Road is a combined system.

4.1.10. To reduce waste water produced by the development water saving devices will be specified with a view to limiting water consumption to no more than 125litres per person per day.

5. Community Safety

5.1.1. It is anticipated that the change of use from office to residential use will improve community safety because there is likely to be a presence on site over a typical 24 hour period with visual surveillance over the site by the residents. When in use as an office the building and car park would only be used during normal office hours with no active surveillance of the accessible car park to the rear.

5.1.2. The building will also be provided with a sprinkler system that will improve the safety of occupants and contribute towards a safer neighbourhood.

6. Movement

6.1.1. The site is ideally placed to provide pedestrian access to all the facilities likely to be required by residents of the new development. The council offices are within 50 metres, the local post office is within 150metres, the High Street approximately 650metres, the community hospital 500metres and the bus and rail terminus approximately 800 metres so the location is highly sustainable in terms of links to facilities and transport.

6.1.2. It is proposed that the number of car parking spaces is reduced from 34 to 24. The reduced number would be compliant with Denbighshire County Council 'Supplementary Planning Guidance Note – Parking in New Developments' which for general apartments indicates 1 space per bedroom and additionally one space per 5 units for visitors which would equate to 24 spaces for this development.

6.1.3. In addition to a reduction in vehicles it is anticipated that journeys would be spread over a wider period due to the change from office to residential use, reducing peak flows and easing congestion on neighbouring roads.