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Caerphilly County Borough Council
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18th December 2023

Dear Sir / Madam

RE: Listed Building Consent - Proposed roof works at Aberbeeg Hospital, Pendarren Road, Aberbeeg, NP13 2DA

Please find enclosed a Listed Building Consent application submitted on behalf of our client iMeUS Ltd, a subsidiary of Elysium Healthcare Ltd. The application proposes the replacement of the existing roof on part of the Aberbeeg Hospital which is urgently required due to the deterioration of the roof structure. Other associated works include the rebuilding of chimney stacks, replacement of missing ridge tiles, replacement of asbestos soffits and existing rainwater goods.

In support of this application, the following information has been submitted via the Planning Portal:

Location Plan;

Plan to identify the proposed area of works to the roof;

Structural survey report undertaken by Forbes Associates; and

Method Statement prepared by OTL Group Construction.

The application form and associated documentation have been submitted electronically via the Planning Portal (PP-12651145). No fee is required for this application.

Site and Surroundings

Aberbeeg Hospital is located outside the settlement boundary, approximately 1km to the north of Trinant and set within extensive grounds of over 4.6ha. The hospital is currently used as a low and medium secure mental health hospital (Use Class C2A) operated by Elysium Healthcare.

The hospital complex comprises the Grade II Listed former Abertillery and District Hospital. This part of the hospital includes two parallel 'ranges' linked by a short corridor. The front, main part forms the former administration, treatment and accommodation block whilst the rear range

comprised the ward block. There are additional satellite 'pods' to the rear along with a later ward building.

There are a number of additional buildings located within the grounds; former morgue, garages and a more recent large extension to provide an additional ward for the hospital. The site also includes Grade II Listed Memorial Gates which are located at the entrance to the hospital complex.

Planning History

The site has been the subject of many planning applications over the years both for new development within the site to meet the needs of the healthcare facility and specifically for works to the Listed Building to address ongoing maintenance issues.

Notably, Listed Building Consent application proposed the carrying out of repairs, refurbishment and making safe works including the demolition of the chimney, minor roof repairs, external render, damp proofing to one wall, asbestos removal of licensed and non-licensed material, demolition of single storey flat roof and redundant link corridor extension together with minor cosmetic refurbishment of three rooms. The application was approved on the 4.12.2020.

Following the approval, a start was made on the works focussing on the roof and chimneys. The works comprised:

- Localised roof repairs to damaged clay roof and ridge tiles together with general weatherproofing of leaks;

- Encapsulation of 3 chimneys in a temporary waterproof product (tarpaulin sheets) to prevent further water ingress and subsequent damage to the building; and

- Demolition of a dangerous / redundant commercial chimney from the boiler-house. The chimney was taken down to a height of 1.5m above ground level, capped and preserved for future reference.

The remainder of the works were ultimately not completed due limited resources and efforts being diverted elsewhere to address the challenges faced by the covid pandemic. This consent is still extant on the basis that work has commenced to implement the works to the listed building.

It is relevant to note that there are two additional applications currently with the Council; 23/0778/FULL and 23/0779/LBC (planning and listed building consent). The applications seek approval for the conversion of former morgue together with the demolition and redevelopment of the two adjacent garages to provide ancillary staff accommodation, staff welfare facilities, plus associated external works and landscaping. These proposals seek to address the long-term operational needs of Elysium for additional office space which has temporarily been accommodated through the installation of two cabins (granted under planning permissions 21/0687/FUL and 23/0053/RET).

Proposed Works

Elysium have recently commissioned Forbes Building Associated to undertake a building condition overview survey of the Listed Building. This identified a number of issues with the condition of the building which need immediate attention. Elysium have secured the necessary capex funds to undertake an important element of the improvement works through the replacement of the roof to the main long range of the building.

The proposed roof replacement is to take place on the longer ward range of the Listed Building which sits behind the main administrative front range (Area B1 and B2 on the plan below).

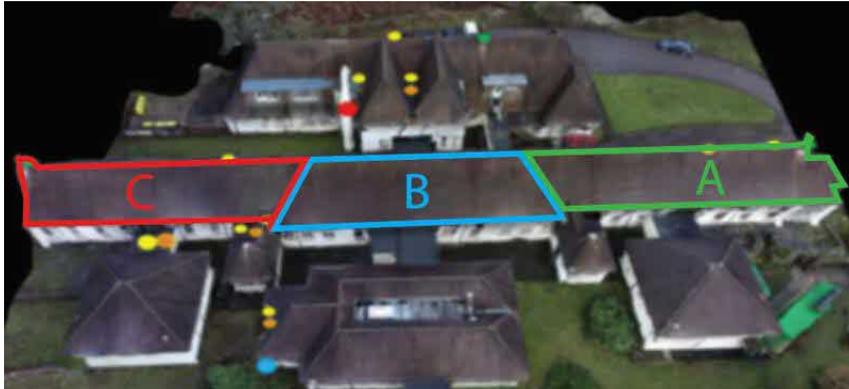
Figure 1 Proposed works to be undertaken on Area B1 and B2 of the Listed Building



The works are required since there has been significant tile slippage on the roof which has allowed water ingress and there is concern that this will cause further damage to the loft spaces and inner ceilings of the Listed Building which are deteriorating and caving in. Elysium wish to address this issue immediately, concerned that the forthcoming winter weather and the potential snow falls could worsen the situation.

Works are to be phased commencing with zone A, with the remaining two zones following in succession over the allocated programme. The existing materials will be reused wherever possible and on a like for like basis if this is not possible. There will be no structural changes.

Figure 2 Diagram of the proposed phasing programme



The proposed works are summarised below (full details are included in the accompanying OTL Method Statement):

- Renew to all roof areas shown in zones A, B & C, using clay tiles and 1F black bitumen roofing felt;
- Works to take down existing chimneys and rebuild using the existing bricks, any replacements to be reclaimed and matched to the existing, using traditional lime mortar;
- Asbestos removal of existing soffits;
- New soffits and timber fascia's; and
- Replacement of Rainwater goods like-for-like.

National Planning Policy

Planning Policy Wales (PPW) Edition 11 was introduced in 2021. It sets out the land use planning policies of the Welsh Government. 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.

PPW acknowledges that community facilities (including hospitals) can be delivered by the public, private or third-party sectors and contribute to a sense of place which is important to the health, well-being and amenity of local communities. Their existence is often a key element in creating viable and sustainable places (section 4).

With regard to Listed Buildings, paragraph 6.1.10 notes there should be a general presumption in favour of the preservation or enhancement of a listed building and its setting. For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting, or any features of special architectural or historic interest which it possesses. Further paragraph 6.1.11 notes that the aim should be to find the best way to protect and enhance the special qualities of Listed Buildings, retaining them in a sustainable use.

PPW advises at paragraph 6.1.13 that applicants seeking Listed Building Consent must be able to justify their proposals, show why the alteration or demolition of a Listed Building is desirable or necessary and consider the impact of any change upon its significance. This must be included in a heritage impact statement, which will be proportionate both to the significance of the building and to the degree of change proposed.

The Welsh Government have published a series of Technical Advice Notes (TANs) which provide more detailed guidance. TAN 24 – The Historic Environment (2017) is of particular relevance. It provides guidance as to how to assess the heritage impact of a proposed development and that such an assessment should be proportional both to the significance of the historic asset and to the degree of change proposed.

Finally, the Welsh Government and Cadw have published a further document; 'Managing Change to Listed Buildings in Wales' (May 2017) which sets out the general principles to consider when making changes to Listed Buildings.

With regard to the issue of repairs it notes that repairs should be the minimum necessary to stabilise and conserve the building both for its long-term survival and to meet the needs of continuing use. It advises that it is important to establish the source of the problem so that you do not simply treat the symptom. Further, that repairs should usually be low-key to reinstate and strengthen the structure where necessary. Also, that the use of materials or techniques that closely match those being repaired will generally be appropriate.

Local Planning Policy

The key relevant policies of the adopted Caerphilly Local Development Plan (2010) comprise the following:

SP5: Settlement Boundaries – seeks to prevent inappropriate development in the countryside.

Policy SP6: Place Making – states that development should contribute to creating sustainable places by having full regard to the context of the local, natural, historic, and built environment and its special features.

CW15: General Locational Constraints – advises that development outside of settlement boundaries will not be permitted unless certain criteria are met. No reference is made to development associated with an existing business and the explanation notes that development proposals that do not present specific locally distinct issues will be assessed in accordance with the requirements of national planning policy.

SP10: Conservation of Natural Heritage – notes that the Council will protect, conserve, enhance and manage the natural heritage of the authority in the consideration of all development proposals within both the rural and built environment.

Heritage Considerations and Impact Assessment

The original ranges of the Abertillery and District Hospital were included on the statutory list of buildings of special architectural or historic interest at Grade II on 20.2.09. The list entry description notes the following reason for its designation:

'Listed as an exceptionally well-preserved example of a small cottage hospital, retaining original layout (a good, small-scale example of the pavilion plan), and skilfully designed using a domestic arts-and-crafts idiom to convey its ethos of care'

In terms of the architectural detailing, the listing notes that the main block has a more elaborate architectural scheme with a higher level of enrichment. However, specific reference is made

to the ward block in respect of the bold clay tiled roofs with strongly projecting eaves, the wrought-iron brackets to gutters throughout and the steeply hipped roof.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council, in determining an application for listed building consent, has a statutory duty to pay special attention to the desirability of preserving listed buildings, their setting, or any features of special interest they may possess. The meaning of 'preservation' in this context, as informed by case law, is taken to be the avoidance of harm.

The impact assessment employs current advice provided by Cadw and the Welsh Government as an appropriate for analysis and assessment of potential impacts to historic assets, including Conservation Principles for the Sustainable Management of the Historic Environment in Wales (2011), The Setting of Historic Assets in Wales (2017), TAN24 (2017) and the Heritage Impact Assessment in Wales (2017).

The proposed repair works are essential to stop the ongoing deterioration in the long-range section of the roof through extensive water ingress which is having a damaging impact on the overall condition of the building.

In line with PPW, the proposed work and justification for the work is clearly set out in the accompanying Method Statement. The clay tiles are to be removed and new chimneys taken down. A breathable roofing membrane will be laid, new timber batons and tiles replaced, and the chimneys rebuilt using lime mortar. Should new tiles or bricks be required they will be on a like for like replacement. Similarly, existing asbestos soffits will be replaced with timber and any new rainwater goods required will be replaced with new cast iron. The impact of these items of work will be positive as the condition of the building will be improved.

The overall appearance of the building will be unchanged and the characteristic clay sloping tiled roof restored, albeit some new materials (matching the existing) may be introduced to allow the essential repairs to be completed.

Planning policy set out in the PPW, TAN24 and the document 'Managing Change to Listed Buildings' acknowledge the importance of protecting Listed Buildings and any particular features of special architectural or historic interest which it possesses. The proposed works are essential, the works have been justified, are sympathetic to the character and appearance of the Listed Building and are therefore considered to accord with policy.

Broadly, the Abertillery and District Hospital holds significance and special interest as a good example of a small cottage hospital from 1922 constructed in South Wales. Externally, the building is designed in an interpretation of the Arts and Crafts Domestic Revival architectural styles. The main range holds the most interest and is designed to resemble a house, in an expressive arts and crafts idiom. The other sections, including the ward block, respond to this vernacular character and reflect the functionality of the hospital.

The proposed works will not affect the significance of the hospital and the reasons for designation. In principle, the proposed works will sustain the buildings architectural and historic interest.

Assessment of the Proposal

Previous Listed Building Consent applications have approached the required repair works to the Listed Building in a piecemeal fashion. This application however approaches the central section of the roof in a comprehensive manner, replacing the roof in its entirety rather than patch repair that it is not sustainable in the long term. This is the ideal solution and will ensure the long-term protection of the building.

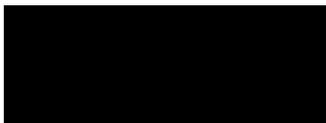
The works to the roof are required urgently. Elysium are keen to undertake the works as soon as possible, fearful that the winter weather will result in a further deterioration of the building. Indeed, scaffolding has already been erected around the first phase of the works in readiness. The need for the works is considered to be so severe that it is our view that these could be undertaken now under Section 9 of the Planning (Listed Buildings and Conservation Areas) Act. It is asserted that the proposed works are needed '*in the interests of safety or health or for the preservation of the building*' (ref 9(3)(a)).

Notwithstanding the above, the current application is supported by the necessary justification for the proposed works and a method statement providing details as to the conservationist approach to be adopted. The existing materials will be reused where possible and appropriate replacement alternatives found if not.

The works are intended to ensure the longevity to the building and without the proposed fundamental repair and refurbishment works to arrest its decay and make this building waterproof and weathertight, it will deteriorate further, threatening the overall structural viability of the building. These works will ensure that the buildings potential for further ancillary use to support the low secure mental health facility that currently exists.

The proposed works are considered to be acceptable and will serve to ensure the preservation of this important historical building in line with policies and guidance contained within national and local planning policy. The proposed roof repairs will ensure that the characteristic clay tiled sloping roof is protected and the character of the listed building retained.

Yours sincerely



Amanda Pickering
Senior Planning Consultant

For and on behalf of

Q+A Planning Ltd