

Planning Statement

Custom House and Former York Hotel,
Custom House Street, Cardiff

LEOM LLP

May 2017



Turley

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Our reference
BART3001

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1. Introduction

1.1 This Planning Statement has been prepared by Turley, on behalf LEOM LLP ('LEOM') in support of a full planning application for the demolition of the Former York Hotel, and the redevelopment of the Grade II Listed Custom House to provide a 248 bedroom hotel (Class C1), with ancillary restaurant (Class A3) at Custom House and Former York Hotel, Custom House Street, Cardiff.

1.2 The application proposal is described as follows:

“Redevelopment of the site to provide a 248-bed hotel (Class C1) and ancillary restaurant (Class A3), including partial demolition of the Custom House, retention and restoration of the Custom House façade, demolition of the Former York Hotel and associated access and ancillary works.”

1.3 The application site comprises 0.14 hectares of brownfield land within the defined 'Central and Bay Business Area' (CBA), as identified by the adopted Local Development Plan. The application proposal will facilitate the regeneration of the vacant and largely derelict Grade II Listed Custom House building, bringing it back into beneficial use. The redevelopment of the site will also deliver a high quality hotel and restaurant offer within Cardiff City Centre, with a number of positive economic and regenerative benefits.

1.4 The proposed hotel will be occupied by Premier Inn. The ground floor will provide front of house and reception facilities to service the proposed Premier Inn hotel and will also be occupied by a 200 cover 'Bar and Block Steakhouse and Bar' restaurant. This will be the fourth Bar and Block restaurant to open in the UK, and represents a significant coup for Cardiff's food and beverage offer.

1.5 Significantly, the application proposal will retain the listed façade of the Custom House and sensitively integrate this with the proposed 20 storey new build element of the scheme. The proposal will provide an active frontage to both the Custom House Street and St Mary Street elevations. The proposal will secure the long term use of the Custom House and the protection of this important heritage asset, bringing the building back into beneficial economic use.

1.6 This Statement should be read in conjunction with the Design & Access Statement, prepared by Holder Mathias Architects (HMA); Heritage Assessment, prepared by Turley Heritage, and other documents and drawings submitted in support of this application.

1.7 An application for Listed Building Consent will be submitted to Cardiff Council under separate cover.

Context

1.8 This Report is intended to assist Cardiff Council in its determination of the application and has been prepared in accordance with the requirements set out in Planning Policy Wales (PPW) and the adopted Cardiff Local Development Plan. It seeks to evaluate the proposed development against national and local planning policies, and considers the justification for the development.

- 1.9 With respect to the required assessments, a sequential assessment is not required in view of the site's location within the CBA.

Report Structure

- 1.10 The remainder of the report is structured as follows:

- Section 2: describes the application site and its surroundings.
- Section 3: describes the design evolution of the application proposal
- Section 4: describes the proposed development.
- Section 5: sets out the planning policy context against which the proposal should be assessed.
- Section 6: provides an assessment of planning considerations.
- Section 7: presents our conclusions.

- 1.11 An extensive programme of pre-application meetings and discussions with Cardiff Council's planning, highways, and conservation officers has taken place in the preparation and development of the application proposal. Advice from officers has been key to the delivery of the scheme in its submitted form.

2. The Application Site and Context

Site Location and Context

- 2.1 The application site is located at the corner of Custom House Street and St Mary Street, within Cardiff's defined 'Central and Bay Business Area' ('CBA') as identified by the adopted Cardiff Local Development Plan ('LDP') (2016). The surrounding area is predominantly commercial in character comprising a number of office (B1), retail (Class A1), food and drink (Class A3) and hotel (Class C1) uses.
- 2.2 The application site extends to approximately 0.14ha and comprises the vacant Custom House and former York Hotel buildings.



- 2.3 The former Custom House is a Grade II listed building, dating to the mid-19th century. The former York Hotel public house, which adjoins the listed building, dates to the late 19th century. The application site is located outside of, but in close proximity to, the St Mary Street Conservation Area.
- 2.4 Custom House is noted for its façade and its relationship with the commercial history of Cardiff. The adjoining former York Hotel building is not listed. The two buildings have been vacant for a number of years and have become derelict and structurally unsound in parts. Due to the lack of active use and the deteriorating condition of the buildings, they no longer make a positive contribution to the street scene.



- 2.5 The site is bound by St Mary Street to the west and by the main South Wales to London railway line to the south. An office building, occupied by The Open University, bounds the application site to the east. Custom House Street forms the application site's northern boundary, beyond which lies the Marriot Hotel and its associated car park.
- 2.6 Vehicular access to the application site is currently gained via a shared access (with The Open University) via Custom House Street. Pedestrian access is also gained from Custom House Street. The site benefits from excellent public transport links with Cardiff Central train station located approximately 200 metres to the west of the application site. Bus services to Cardiff Airport and Swansea are located directly in front of the Custom House, along with regular bus services to Newport, Penarth, Culverhouse Cross, Barry Island and Leckwith.

Relevant Planning History

- 2.7 A number of planning applications have been submitted at the application site in recent years. A summary of relevant applications and permissions is set out below:
- **15/02236/MJR:** An application was approved in December 2015 for the demolition of the former York Hotel and partial demolition, refurbishment, extension and change of use of Custom House to be used for managed student accommodation. Communal facilities and a 95 sq m Class A3 unit were also approved as part of the application. The approved scheme has not been implemented. Listed Building Consent was also granted (LPA ref: **15/02261/MJR**).
 - **09/02188/C:** An application was resolved to be approved in January 2016 for the partial demolition of Custom House, total demolition of York hotel, and construction of 3/4 storey office accommodation and refurbishment of the listed façade, subject to a Section 106 Agreement. The obligations were not completed. The Planning Committee revisited the scheme in October 2012. The Committee again resolved to grant planning permission, subject to the completion of a Section 106 agreement.
 - **09/0993/C:** An application for the temporary change of use of Custom House from a vacant office building to provide a day centre and accommodation for homeless

persons was approved on 5 November 2009. The permission was subject to the temporary use of the building being discontinued within 18 months of the beneficial use of the building commencing; or before the completion of development permitted by planning permission 09/102/C. This use was extended until 30 July 2012 (LPA ref. **12/00798/DCI**). This temporary permission was implemented and has subsequently ceased.

- **08/1724C:** An application was submitted in July 2008 seeking the demolition of the York Hotel along with the rear areas of Custom House and construction of a 3 storey extension to provide 2 upper floors for office use, and 2 Restaurant (Class A3) units at ground floor level, with undercroft car parking. The application was approved subject to a Section 106 agreement on 10 December 2008.
- **05/02239/C:** An application was approved in March 2006 for the change of use of the Custom House to be used as a hotel with ancillary services.

2.8 The above demonstrates that the principle of the demolition of the former York Hotel, the change of use of the Custom House to alternative uses and the partial demolition and retention of the listed façade of the Custom House is well established.

2.9 Significantly, the previous proposals for the redevelopment of the site have not been implemented. LEOM has worked hard to secure a commercial position with Premier Inn (as the end occupier of the proposed hotel) to ensure that the proposal is not only deliverable and viable, but will make a positive impact both visually and economically.

Pre-application Advice

2.10 An extensive programme of pre-application discussions has taken place with senior officers from Cardiff Council. LEOM has been keen to liaise proactively with officers in order to ensure that the application proposal delivers a successful new addition to the skyline of Cardiff City Centre, whilst also respecting the listed Custom House building. The scheme has significantly evolved since our initial dialogue with the Council in October 2016. Input from the Council's planning, urban design and heritage officers over a number of months has played a significant part in shaping and refining the scheme in its submitted form.

2.11 Crucially, senior officers accept the principle of hotel development at the application site. Officers have also agreed that the principle of the proposed design approach, including the proposed height, scale and integration of the new build element of the scheme with the retained Custom House façade is acceptable. Through ongoing discussions, the final appearance of the building (subject to detailing) is considered acceptable.

3. Proposed Development

- 3.1 As outlined in Section 1 of this report, this full planning application proposes the following development:

“Redevelopment of the site to provide a 248-bed hotel (Class C1) and ancillary restaurant (Class A3), including partial demolition of the Custom House, retention and restoration of the Custom House façade, demolition of the Former York Hotel and associated access and ancillary works.”

- 3.2 This application proposes the redevelopment of the application site, including the retention of the Grade II Listed Custom House façade and the demolition of the former York Hotel. The application proposal will extend to 20 storeys in height, inclusive of the existing Custom House façade, and will extend to approximately 12,643 sq m (gross). The development proposed will be occupied by a 248 bed Premier Inn hotel. A 200 cover Bar and Block Restaurant will occupy the ground floor of the building, providing an active frontage to both Custom House Street and St Mary Street. The application also includes associated access and ancillary works.



- 3.3 As noted above, the application proposal will retain the listed Custom House façade, carefully integrating this with the tall new-build element of the scheme. The new build tower will be set back from the Custom House façade in order to retain and enhance the prominence of the Custom House. The large arched windows of the Custom House will provide an active frontage to both Custom House Street and St Mary Street.
- 3.4 The existing former York Hotel building will be demolished as part of the application proposal. The building has fallen into a poor state of repair and is now derelict and unsafe. The front (western) elevation of the York Hotel will be replaced by a high quality modern, double-height ‘planar’ glass wall that will provide activation to the St Mary Street frontage, providing enhanced natural surveillance and activity.
- 3.5 In view of the application site’s highly sustainable location, car parking is not proposed on site. Two disabled car parking spaces will be provided.

3.6 The redevelopment of the application site will bring about significant regeneration benefits by providing much needed additional hotel accommodation on a currently underutilised, city centre brownfield site. The proposal will create a high quality modern development that will positively enhance the street scene, whilst respecting the character and appearance of the listed Custom House façade.

3.7 The wider economic benefits of the proposal are detailed within the Economic Impact Statement, prepared by Turley Economics, which accompanies this application.

The 'Premier Inn' brand

3.8 Whitbread both own and operate the Premier Inn brand. Premier Inn is the biggest hotel brand in the UK, with over 600 hotels nationwide.

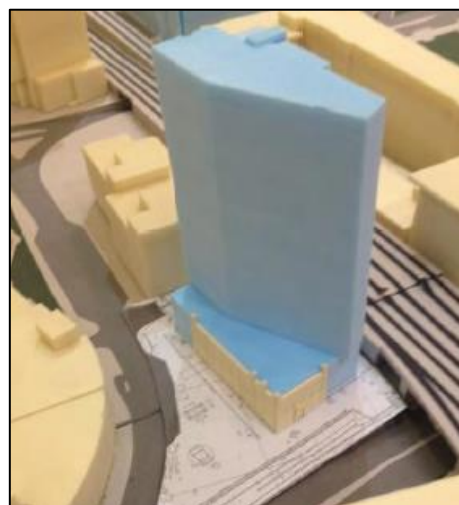
3.9 Premier Inn has an excellent reputation for affordability and quality with rooms available from around £55 per night. A typical 'Premier Inn' bedroom will provide the following features:

- King size bed
- En-suite bathroom with bath and shower
- WiFi
- Remote control TV with Freeview
- Tea and Coffee

3.10 In short, Premier Inn offers its customers a high quality service at budget prices, and as such they enjoy an excellent reputation in the market place.

Design

3.11 The design and layout of the application proposal has evolved over a number of months and through a series of pre-application discussions and on-site meetings with senior planning and conservation officers from Cardiff Council.



- 3.12 The existing buildings on-site have over a number of years become derelict. Therefore, the design evolution has focussed attention on the retention of the original 1845 Custom House facades on Custom House Street and St Mary Street and the successful integration of a new-build tall building to accommodate the requisite number of hotel rooms. The removal of the later 1865 'extension' to the Custom House will provide the opportunity to visually 'ground' the new-build tower.
- 3.13 The proposed new-build element of the scheme will be set back from the Custom House façade. This will allow the proposed tall building to be considered as a backdrop to the Listed Building with a view of projecting its visual prominence and enhancing its setting.
- 3.14 The new hotel, as a tall building, will be distinctive, elegant and of a high architectural quality, making a positive contribution to the street scene and Cardiff's skyline.
- 3.15 Full details regarding the evolution of the scheme and the design concept are included within the accompanying Design and Access Statement, prepared by HMA.
- 3.16 In addition to this Planning Statement, the application should be read alongside the following plans, drawings and supporting reports;
- Supporting Plans and Drawings;
 - Design and Access Statement;
 - Heritage Impact Statement;
 - Economic Impact Statement;
 - Flood Consequences Assessment (Including Drainage Strategy);
 - Transport Statement and Travel Plan;
 - Site Investigation Report
 - Bat Survey Report

4. Planning Policy Context

- 4.1 This section provides an assessment of the proposed development with reference to the planning policy context and other material considerations. The policy framework is set out in Section 4 above.

National Planning Policy

Planning Policy Wales (Edition 9, November 2016)

- 4.2 Planning Policy Wales ('PPW') sets out the main land use planning policies of the Welsh Government against which development proposals should be assessed.
- 4.3 **Paragraph 4.2.1** states that the planning system is necessary and central to achieving the sustainable development of Wales. The planning system therefore provides for "a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision-taker...in taking decisions on individual planning applications".
- 4.4 **Paragraph 4.9.1** notes that previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites.
- 4.5 **Section 4.11** seeks to ensure sustainable development through good design.
- 4.6 Section 6.1 sets out the Welsh Government's Objectives to preserve or enhance the historic environment, ensure the protection or enhancement of conservation areas and ensure that the character of historic buildings is safeguarded from works that would compromise their special architectural and historic interest. **Paragraph 6.2.1** sets out the objective to safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved.
- 4.7 **Paragraph 6.5.11** states that there is a strong presumption towards the preservation of listed buildings and their setting. Developments that conflict with this should aim to find the best way to retain special qualities of the listed buildings in a sustainable use. Where development is necessary to preserve listed buildings, reinstating the original uses should be the first option, if appropriate. If not, planning controls should recognise the need for flexibility where new uses are considered in order to secure the future of the listed building.
- 4.8 **Paragraph 6.5.11** states the primary material consideration for any development proposal affecting a listed building, 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. PPW seeks to protect and enhance the special qualities of listed buildings, while retaining them in sustainable use. .
- 4.9 **Chapter 7** relates to Economic Development. **Paragraph 7.1.1** recognises that economic land uses include the traditional employment land uses, but also uses such as retail, tourism and public services.

- 4.10 **Paragraph 11.1.1** notes that tourism is vital to economic prosperity and job creation in many parts of Wales. **Paragraph 11.1.4** goes on to say that the planning system should encourage sustainable tourism in ways which enable it to contribute to economic development and conservation.

Local Planning Policy

Cardiff Local Development Plan (2016)

- 4.11 Paragraph 2.1 of the adopted Local Development Plan ('LDP') recognises that the leisure and tourism sector generates significant economic and cultural benefits for the city.
- 4.12 The site is located within 'Strategic Site A: Cardiff Central Enterprise Zone and Regional Transport Hub' under **Key Policy 2(A)**. Strategic Site A is described as:
- "Major employment-led initiative including a Regional Transport Hub together with other mixed uses in Cardiff city centre in order to fulfil Cardiff's role as economic driver of the city-region, provide major employment opportunities focused on financial and business services and maximise the advantages of its location adjacent to the Central Station and Cardiff Bus Station."*
- 4.13 The site is located within an area allocated for business/employment uses as part of Strategic Site A. The LDP encourages high rise, high density development at appropriate locations within Strategic Zone A.
- 4.14 **Key Policy 5** requires development proposals to be of a high quality, sustainable design which responds to the local character in terms of the layout, scale, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage. The policy further notes proposals should promote the efficient use of land, developing at the highest practicable densities, foster inclusive design and locate tall buildings in locations which are highly accessible through walking and public transport and within an existing or proposed cluster of tall buildings.
- 4.15 The site falls within the defined Central and Bay Business Area. **Key Policy 10** of the adopted LDP states that new offices, residential and commercial leisure uses are considered appropriate within the Central and Bay Business Area, as well as other uses most appropriately located within city areas. Paragraph 4.137 states that:
- "New and improved leisure, recreation and tourist facilities are important for the future development of Cardiff. These uses are major employers in the city centre and generate significant benefits to the local economy."*
- 4.16 **Key Policy 17** relates to built heritage and seeks to protect, manage and enhance Cardiff's distinctive heritage assets.
- 4.17 **Policy EC5** supports hotel development at appropriate locations within the Central Business Area, subject to considerations of scale, location, design, amenity and transportation.

- 4.18 **Policy EN9** seeks to protect the City's heritage assets. Proposals which relate to heritage assets, including listed buildings, will only be permitted where it can be demonstrated that it preserves or enhances that asset's architectural quality, historic and cultural significance, character, integrity and/or setting.

Other Material Considerations

Tall Buildings SPG (2017)

- 4.19 The Tall Buildings SPG states that in the city centre context, it considers buildings of 8 storeys and above as tall buildings.
- 4.20 Section 2.1 acknowledges that areas that typically lend themselves to tall buildings include railway corridors, urban corner sites in the core of the city centre, and sites that form part of existing clusters of tall buildings.
- 4.21 The SPG notes proposals for tall buildings may have a detrimental effect on nearby heritage assets. It requires tall buildings to be sympathetic with their surroundings and have a minimal visual impact on important vistas and sensitive historic environments, including Listed Buildings, Conservation Areas and their setting.
- 4.22 Section 2.2 relates to the design of tall buildings and requires the design and appearance of tall buildings to be, inter alia, to make a positive contribution to the skyline and streetscape and to be of an exceptional quality.

Policy Overview

- 4.23 To summarise, a number of key policy themes emerge as being relevant to the proposed development. These are as follows:
- Achieving sustainable developments which ensure the beneficial reuse of brownfield sites and protect the vitality of existing centres. PPW confirms that sustainability is the guiding principle which should influence the planning process.
 - New proposals should encourage the use of sustainable transport options and accessibility for all.
 - Design quality is an integral part of the planning process. Planning policies at all levels promote high quality inclusive design in the layout of new developments and individual buildings in terms of function, accessibility and impact to achieve and deliver sustainable development.
 - Hotel uses are supported in principle through the Development Plan within the Central and Bay Business Area.
 - The LDP promotes high density, high rise development within appropriate areas of the CBC. Tall buildings should be of a high quality.
 - Cardiff's heritage assets should be protected and enhanced where possible.

4.24 In light of the above, we consider that an application for the redevelopment of the site to provide a new purpose built hotel (Class C1) with ancillary restaurant (Class A3) use along with the retention of the listed Custom House façade is compliant with planning policy at all levels.

5. Planning Analysis

Principle of Development

- 5.1 The principle of the redevelopment of the application site, the demolition of the York Hotel, and the partial demolition of Custom House, including the retention of the listed Custom House façade, has been well established through a series of (unimplemented) planning permissions over a number of years.
- 5.2 The site is located within the CBA as defined by the adopted LDP. Hotel development in this location is compliant with adopted policy. The application site falls within Cardiff's defined settlement boundary and consists of brownfield, previously developed land. The site's redevelopment is supported by planning policy at all levels. The proposal is of a scale and intensity appropriate to the application site's city centre location.
- 5.3 The application proposal represents a significant investment by LEOM, a local Cardiff based developer. The proposal will secure the long term beneficial use of the application site, preserving and refurbishing the Listed Custom House façade, and delivering a range of positive benefits to the local area.
- 5.4 The application proposal will deliver a number of direct and indirect economic and social benefits, making a positive contribution to the thriving Cardiff economy. The proposed Premier Inn hotel and Bar and Block restaurant will create 86 new jobs for local people. These include a mix of full and part-time roles, including managerial, front of house, housekeeping and catering positions. This equates to 68 new gross full time equivalent jobs. Premier Inn also offers a range of graduate career opportunities for the recruitment and retention of graduates.
- 5.5 The application is supported by an Economic Impact Assessment, prepared by Turley Economics. The Assessment provides an independent appraisal of the scheme's economic impacts, proving the following key conclusions:

Construction phase

- Employment: The proposed development has the potential to provide 123 net additional full time equivalent (FTE) jobs within Cardiff, increasing to 321 FTE jobs at the wider Wales wide scale. These jobs will be directly in the construction sector and associated trades.
- Productivity: The proposed development will generate £7.3m GVA at Cardiff level and £18.4m GVA across Wales

Operational phase

- Employment: The scheme will support 86 total direct jobs (full and part time). This equates to 68 gross direct FTE jobs.
- Factoring in the extent to which employment impacts will be taken up by people outside Cardiff, displacement and economic multipliers, the development will create 38 net additional FTE jobs within Cardiff. This increases to 99 net additional FTE jobs across Wales.

- Productivity: The proposed development will result in a productivity boost of £1.2m GVA in Cardiff and £3.3m GVA across Wales.

Hotel visitor expenditure impacts

- The proposed development will provide accommodation for visitors to Cardiff and Wales more generally. There is the potential for £2.25m in additional visitor expenditure per annum to be generated. This level of expenditure has the potential to support 21 leisure related jobs in existing and new businesses.

Business rates impacts

- The proposed development will create additional business rates revenue every year which will accrue to Cardiff Council and can help to finance essential services and investments in the city on an ongoing basis. The development could result in a total business rates revenue of £150,000 per annum, with 100% of this sum being retained by Cardiff Council in the period from 2020 onward.

- 5.6 In light of the above, the application proposal is compliant with sustainable objectives and principles at both national and local levels and has been supported by Officers during pre-application discussions.

Additional Hotel Room Provision

- 5.7 The application proposal positively responds to the demand for additional visitor accommodation within Cardiff city centre. Premier Inn has actively sought opportunities for an appropriate location for an additional hotel within the city centre for an extended period of time. The application site represents a strategically important opportunity for Premier Inn, delivering 248 new hotel rooms, and bringing a key gateway site back into beneficial use.
- 5.8 The Cardiff Tourism Strategy and Action Plan (“the Action Plan”) (2015-2020) identifies that tourism supports over 13,700 full time equivalent jobs (FTE) in the city and indicates that hotels have been reporting high levels of occupancy in recent years.
- 5.9 The Action Plan identifies a *“need to get more discretionary tourist visits especially in terms of overnight guests using commercial accommodation and staying longer and spending more.”* The Action Plan notes the limited range and capacity of the existing hotel bedstock. Consequently, a key objective of the strategy to be achieved by 2020 is an *“increased range, quality and diversity of hotels and hostels in the city centre and in the bay.”*
- 5.10 The application proposal will assist in the delivery of the Action Plan’s objectives, providing 248 modern, high quality and affordable hotel rooms at a prominent and sustainable location in the heart of the city centre, in close proximity to transport links, the retail centre and the emerging Central Square development.
- 5.11 Significantly, the application proposal has the potential to generate an additional £2.28m in additional visitor expenditure within Cardiff and South Wales per annum.

Design

- 5.12 Detailed analysis regarding the application proposal's layout, scale and design justification is set out within the supporting Design and Access Statement, prepared by Holder Mathias Architects. The Design and Access Statement explains the process of site analysis and contextual appraisal undertaken in formulating the development proposal. It illustrates how the design principles of the site's surroundings, its broader context within the wider townscape and the initial design and accommodation brief provided by LEOM, have all informed the massing and arrangement of the application proposal.
- 5.13 The final design has been informed by a series of pre-application discussions with Officers and positively responds to the site context. A key consideration in the design evolution has been the appropriate retention of the listed Custom House façade, a clear and proportionate understanding of the significance of the listed building and nearby conservation area, and achieving a successful relationship between the retained elements of the Custom House and the modern new build element.



- 5.14 Through extensive and detailed pre-application engagement with Officers, the principle of a tall building significantly set back from the retained Custom House façade and the demolition of the York Hotel have been tested and established. The application proposal will provide active frontages to both Custom House Street and St Mary Street, significantly improving the feel and appearance of this corner site and providing increased natural surveillance. Existing points of access and egress (both pedestrian and vehicular) will be retained where possible. The application proposal will provide two points of access, a main hotel entrance on Custom House Street and restaurant entrance from St Mary Street.
- 5.15 Due to the limited area at the rear of the site, adjacent to the mainline railway viaduct/wall for service vehicle manoeuvres, use of the wide areas of public realm immediately in front of the application site on Custom House Street for servicing has also been established. The general layout of the application proposals and the disposition of the tall building relative to the retained sections of the Custom House

building facades on both the Custom House Street and St Mary Street frontages has been agreed, including the primary and secondary points of entrance to the hotel and the restaurant.

- 5.16 Vehicular access to the application site is established through the existing shared arrangement with the neighbouring Open University offices. The application proposes minor modification to the arrangement of dropped curbs to Custom House Street to enable vehicles servicing the Premier Inn hotel and Bar and Block restaurant to access the site.



- 5.17 The high density nature of the application proposals and the inclusion of a tall building component is considered entirely appropriate at the site. The development is consistent with the emerging density of buildings being developed and proposed within many areas of Cardiff City Centre. Given the accessible and sustainable location of the application site, close to bus and rail links and pedestrian and cycle facilities, the increased density maximises the utility and value of the location to the local economy. It also provides Cardiff with valuable additional employment in its leisure and tourism sectors, in line with local and national policies. Critically, it offers the opportunity to bring the listed Custom House building back into beneficial use, providing it with a renewed visual presence at the junction of Custom House Street and St Mary Street. In this sense, the application proposals are deemed to offer an appropriate level of development for this site.

- 5.18 The application proposes works to refurbish and repair the retained elements of the Custom House façade. The works will utilise appropriate materials and techniques and enhance the building's declining condition. These works will be developed in dialogue with Cadw and the Council.

Heritage

- 5.19 The application is supported by a detailed Heritage Impact Statement, prepared by Turley Heritage. The Statement provides an assessment of the particular significance

of a range of historic assets and impacts associated with the redevelopment of the former Custom House and the former York Hotel.

- 5.20 The former Custom House is a grade II listed building, dating to the mid-19th century. The former York Hotel, which adjoins the listed building, dates to the late 19th century, but is not statutorily listed or formally identified by Cardiff Council as a Local Historic Asset. The site is located in close proximity to the St Mary Conservation Area. Accordingly, there is a statutory duty to have special regard to the desirability of preserving the listed building, its setting, or any features of special architectural or historic interest which it possesses. There is no statutory duty regarding the setting of a conservation area.
- 5.21 The Statement concludes that the impacts of the application proposal, both beneficial and harmful, are derived directly from the scheme's overall objective to guarantee the long-term, sustainable future of the listed building and to halt the ongoing decline in the condition of its significant elements. As such, the overall impacts of the proposals upon the significance of the heritage assets must be considered in the round.
- 5.22 The Statement demonstrates that the proposed development will sustain the particular heritage significance of the nearby St Mary Conservation Area and will satisfy the objectives of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant planning policy framework.
- 5.23 The Statement does identify that some aspects of the proposed development will give rise to a degree of harm to the significance of the former Custom House. Whilst the proposed works are extensive, planning policy and guidance make clear that it is the degree of harm to the asset's significance, rather than the scale of the development that is to be assessed. In the context of its history of adaptation and significant alteration, the very particular nature of the building's special interest, and the limited contribution made by its setting to that special interest, this would be comparatively minor.
- 5.24 In overall terms, the proposed development would result in a degree of harm to the very particular special interest of the listed building. Accordingly, that harm must be weighed in the balance against the wider public and economic benefits identified within this Statement and the supporting Design and Access Statement.

Highways

- 5.25 A Transport Statement, prepared by Vectos, has been prepared in support of this application proposal.
- 5.26 The report concludes that, due to the location of the application site, the vast majority of visitors will access the site via sustainable modes of travel, such as bus and rail. In light of the site's sustainable location, the application proposal will have no material impact upon the operation of the highway network. Accordingly, the application proposal is considered to be acceptable in transportation terms.

Flood Consequences and Drainage

- 5.27 The application is supported by a Flood Consequence Assessment, including a surface and foul water drainage strategy (prepared by Vectos). The Assessment confirms that the application site is located entirely within Flood Zone A and experiences little or no flood risk from fluvial or coastal sources. The Assessment concludes that flood mitigation measures are not considered necessary.
- 5.28 The existing surface water connection with the public sewer will be retained. The Drainage Strategy suggests that in order to provide betterment in terms of the existing brownfield run-off rate, subsurface storage could be provided within the service yard. This will be subject to detailed design and consultation with relevant bodies.

Ecology

- 5.29 A Bat Survey Report, prepared by EDP, is submitted in support of this application.
- 5.30 The Report concludes that the on-site buildings have negligible to moderate potential to support roosting bats. The results of EDP's assessment are therefore comparable to those which supported the previous application at the application site in 2015. A dusk emergence survey was completed during May 2017, with a second survey programmed for completion in early June, in line with best practice guidance. No emerging bats were identified during the initial May survey.
- 5.31 EDP recommends that a thorough inspection is undertaken prior to the commencement of any demolition work at the application site. Demolition should also avoid the key summer roosting and winter hibernation periods. This will also ensure that any potential impacts upon nesting birds can be avoided.
- 5.32 EDP concludes that, subject to the above mitigation measures being implemented, the application proposal satisfies both legal and adopted planning policy requirements.

6. Conclusion

- 6.1 This Planning Statement is submitted by Turley on behalf of LEOM, in support of a full planning application for the redevelopment of the Custom House to provide a 248-bed Premier Inn hotel and ancillary Bar and Block restaurant. The application also proposes the demolition of the former York Hotel, partial demolition of the Custom House and retention of the Grade II Listed Custom House façade. This Planning Statement should be read in conjunction with the Design and Access Statement and other documents and drawings submitted in support of this application.
- 6.2 Further to positive pre-application discussions with senior Council officials, the statement has demonstrated that the proposal is in accordance with planning policy at all levels.
- 6.3 It has been demonstrated that the application proposal will deliver a number of major benefits to Cardiff City Centre, including:
- The redevelopment of a vacant and underutilised site, securing the preservation of the Listed Custom House façade and bringing the building back into beneficial use;
 - The regeneration of an underutilised and unsightly brownfield site at a prominent location;
 - The provision of new, high quality and affordable hotel accommodation;
 - Major employment/economic benefits in terms of construction and hospitality and leisure jobs; and
 - The erection of a high quality, contemporary and well-designed building at a prominent site within the city centre.
- 6.4 This Planning Statement and the wider application demonstrate that the proposed development can be readily accommodated on the application site and is fully acceptable in principle and in terms of all environmental and technical considerations.
- 6.5 The Heritage Impact Statement has identified a minor degree of harm (in heritage terms) to the Listed Custom House building. However, this must be balanced against the significant number of positive impacts that the scheme will deliver. These include the creation of 86 new direct jobs for local people, significant investment to redevelop a landmark site at a prominent city centre location capable of attracting £2.25m in additional visitor expenditure per annum in Cardiff, and the restoration and retention of the Custom House's façade ensuring that the history and prominence of the building will be retained and secured.
- 6.6 An application for Listed Building Consent for the works proposed will be submitted to Cardiff Council under separate cover.

6.7 The application is compliant with national and local policy and it is concluded that there is a compelling case in favour of this important and clearly beneficial development for a new Premier Inn hotel and 200 cover restaurant at an accessible, well serviced site that will ensure the beneficial reuse of underutilised land and secure the long term preservation of the Grade II Listed Custom House façade.

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