
2020



**Tudno Castle Hotel
Vaughan Street
Llandudno
Conwy
LL30 1YL**

Application for the redevelopment of Tudno Castle Hotel to Provide up to 90 Bedroom Hotel and Restaurant unit, 3 retail/ restaurant units and 1no Business Unit at the site of the Tudno Castle Hotel, Llandudno.

Planning Statement

On behalf of

Tudno Developments Limited

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1. Introduction

Purpose of the Statement

- 1.1 This Planning Support Statement has been produced to support a full planning application for the redevelopment of the former Tudno Castle Hotel site to provide a hotel with up to 90 bedrooms and associated restaurant, 3 retail/ restaurant units and a business unit/ gym at Tudno Castle, Vaughan Street, Llandudno, Conwy.
- 1.2 The redevelopment of the site has a long and complex history. Planning permission for the demolition of the former Tudno Castle Hotel and redevelopment of the site, including the recreation of the listed façade of Tudno Castle which was beyond repair was secured in 2018.
- 1.3 Redevelopment of the site, under permission 0/44478 commenced in 2018 and the development is substantially complete. The external works, including the recreation of the listed façade are complete and internally the majority of the internal spaces are complete.
- 1.4 Due to economic changes since permission was granted in 2018, this planning application seeks minor internal and external amendments to the approved scheme to provide additional hotel bedrooms and adjust the configuration and type of spaces provided. The type and number of changes meant that a minor amendment to the planning permission was not possible and this application therefore seeks a new planning permission for the proposed development despite substantial completion of the development.
- 1.5 This Statement describes the application site and proposed development before briefly identifying and examining the issues relevant to the application.
- 1.6 The application is supported by the following documents;
 - Full Plans and elevations;
 - Application form
 - Design and Access Statement
 - Heritage Statement
 - Transport Statement
 - Biodiversity Statement
 - Flood Consequences Assessment (FCA) and Appendices

2. The Site Context

Location

- 2.1 The Tudno Castle Hotel site is situated within the Llandudno Conservation Area. The site is bounded by Mostyn Broadway (to the north), Conway Road to the southwest and North Western Gardens to the north west. The Parc Llandudno Retail Park is located to the south east.
- 2.2 The application site is located in the eastern edge of the town centres primary shopping area with the bulk of the town centre located to the west and north west of the site.

Planning History

- 2.3 The site benefits from approval and Listed Building Consent for the demolition of the Tudno Castle Hotel and for the reconstruction of the listed facades and development of a hotel, restaurants and retail units, reference 0/44478 and 0/44433LBC.
- 2.4 The permissions remain extant and work has progressed under these permissions so that the development is substantially complete at the time of writing.
- 2.5 Prior to consent for the demolition of the Tudno Castle and development including reconstruction of the listed facades, development proposals sought to retain the listed facades. Planning permission and listed building consent was granted under references 0/40758 and 40759 for development of a hotel on the site which incorporated the listed façades. Work began in 2017, however, following initial demolition works the façades were deemed to be unstable and were demolished.
- 2.6 The table below provides details of the Planning and Listed Building Consent applications relating to the building. There are a number of applications relating to the discharge of conditions attached to the permissions that are not listed below.

0/44478 and 0/44433LBC	Proposed demolition of Tudno Castle Hotel and redevelopment to provide 63 bed hotel, 5 no restaurants units and 1 no business unit to include the recreation of the listed façade at the site of Tudno Castle Hotel .
0/43948 and 0/40759	Planning and retrospective Listed Building consent to amend application number 40758.
0/40758	Proposed 63 bedroom hotel, 3 no restaurant units, 2 no. retail units and 1 no. business unit incorporating listed façade retention. Planning permission 16/09/2014
0/40759	Proposed 63 bedroom hotel, 3 no restaurant units, 2 no retail units and 1 no business unit incorporating listed façade

Proposed amendments to the redevelopment of Tudno Castle Hotel to provide 90 bedroom hotel and restaurant, 3 retail/ restaurant units and a business unit.

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	retention (Listed Building Consent 16/09/2014).
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3. Description of Proposed Development

- 3.1 Changes are required to the extant scheme (0/44478) to reflect and adjust to changes in the economic climate since works commenced on the development.
- 3.2 This application seeks a new permission for the site for ease of reference and clarity despite work on the redevelopment being substantially complete under the extant permission. At the time of writing the reconstruction of the listed façade is complete together with the additional retail units, external parking areas and internal works on the majority of floors are complete. The application is accompanied by a number of photographs taken in September 2020 showing the progress of the development.
- 3.3 The application seeks relatively minor changes to the external appearance and internal configuration of the building at the lower ground, upper ground and first floors of the development. The proposed development will enable an increase in the number of bedrooms and allow for alternative supporting uses at the ground floor.
- 3.4 The changes to the extant permission proposed in this application can be summarised as follows:

External changes to previously approved scheme 0/44478

- Reinstatement of traditional rendered façade on the main elevation. The extant scheme included a glazed central porch on the main elevation which is not now proposed to be included.
- Proposed rooftop rear extension to first floor to enable provision of additional bedroom;
- Removal of the fire escape stairs by the yard entrance of the extant scheme
- Proposed additional small plant area to the roof of the gym unit to service the lower ground floor unit;

Internal Changes to previously approved scheme 0/44478

Lower Ground Floor

Proposed reconfiguration of internal space to provide a Premier Inn reception and associated restaurant and separate unit 3;

Ground Floor

Reconfiguration of internal space to reduce units from four to two and to provide 23 additional Premier Inn Bedrooms;

First Floor

Proposed external extension and reconfiguration of space to provide four additional Premier Inn rooms (25 in total) and a reduced Gym/ Business Unit.

Second Floor and Third Floor

Remain as extant scheme

- 3.5 This application therefore seeks to provide the following:
- **Hotel to provide up to 90 Bedroom with associated restaurant – 3,360m²**
 - **Unit 1, 141m² Retail/ Restaurant use (A1/ A3)**

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- **Unit 2, 262m² Retail/ Restaurant use (A1/A3)**
- **Unit 3, 150m² Retail/ Restaurant use (A1/A3)**
- **Unit 4, 262m² Business/ gym Unit (B1/D2)**

3.6 A flexible use is sought for each of the units to provide flexibility in the current economic climate to ensure the vitality and viability of the scheme.

4. Relevant Planning Policy

National Planning Policy

Planning Policy Wales

4.1 A number of Technical Advice Notes are relevant to the application including;

- TAN 4: Retail and Commercial development
- TAN 12: Design
- TAN 13: Tourism
- TAN 15: Development & Flood Risk
- TAN 18: Transport
- TAN 23: Economic Development
- TAN 24: The Historic Environment

Conwy Local Development Plan

4.2 The Conway Local Development Plan, adopted 2013 is relevant and provides the key objectives and policies for development in Conway Borough outside the Snowdonia National Park.

4.3 A number of policies in the plan are relevant to the development including DP1 and which promote Sustainable Development Principles and design quality. Policy DP4 sets out a range of development criteria which should be provided where appropriate and in accordance with the plan such as car parking and safe and convenient access.

4.4 Policies TOU 1 states that the Council will promote a sustainable tourism economy through a number of principles including supporting the establishment or new or converted high quality hotels which broaden the range of accommodation available.

4.5 Policy TOU 2 supports new high quality sustainable tourism development subject to a number of criteria set out in the policy.

4.6 Policy CFS1 refers to Community Facilities and Services and seeks to protect and where possible enhance community facilities through a range of proposals and initiatives. Policy CFS2 relates to the Primary Shopping Area and restricts the change of use of the ground floor of premises away from class A1 unless a number of criteria can be met.

4.7 Policies CTH 1 and 2 refer to Cultural Heritage and development affecting Heritage Assets. The policies seek to protect and where appropriate enhance cultural and heritage assets.

4.8 Policy CTH/5 relates to the Welsh language and requires a Community and Linguistic Statement to accompany certain applications including tourist development with an area of 1,000 square metres or more.

4.9 Policies STR1 and 2 promote sustainable transport, development and accessibility and state that parking provision should be in accordance with maximum parking standards.

5. Planning Assessment

- 5.1 The principle of development has been established through the extant application 0/44478 and listed building consent 0/44433 for the proposed 63 bedroom hotel, 5 restaurant units, and a business unit. The extant permission enabled the demolition of the original building and recreation of the listed facades and development of the approved uses and additional areas.
- 5.2 At the time of writing the development as permitted under the extant consent (0/44478) has been substantially completed. As a result of economic changes to requirements since permission was granted in 2018, the proposed application is necessary to enable changes to the development to be made so that it meets the current requirements to ensure a successful and viable operation.

Proposed Use

- 5.3 The principle of the proposed uses on the site have been established in the extant consent. This new application reflects the extant consent and seeks to increase the number of bedrooms provided in the hotel from 63 to 90 rooms. The additional rooms are provided on the upper ground floor in an area previously permitted for restaurant units.
- 5.4 The proposed increase in the number of bedrooms, reduces the number and configuration of restaurant units in the scheme.
- 5.5 At lower ground floor, the proposed development provides a restaurant at lower ground floor associated with the hotel. An additional small unit for retail/ restaurant use (unit 3) is also provided at this level.
- 5.6 On the upper ground floor, the area previously proposed for restaurant units within the recreated Tudno castle will provide additional hotel rooms, 23 in total. Units 1 and 2 provided in the contemporary extension will remain unchanged.
- 5.7 In order to provide future flexibility to the scheme, permission for a flexible retail or restaurant use (A1/ A3) is sought for units 1, 2 and 3.
- 5.8 Finally, the proposed business unit/ gym remains within the scheme on the first floor of the extension area albeit that the floor area is reduced slightly. The reduced gym unit and small first floor extension together provide the quantum area to allow for 4 further bedrooms on this floor, providing a total of 25 bedrooms on the first floor.
- 5.9 The second and third floors remain the same as in the extant scheme, each floor providing 21 bedrooms.
- 5.10 The proposed flexible use of units 1-3, together with the business unit and hotel will provide an interesting and suitable mix for the site which will maintain and enhance the vitality and viability of the town centre.

Retail Assessment

- 5.11 Policy CFS/1 of the adopted plan relates to Community facilities and services and seeks to protect and enhance the vitality, attractiveness and viability of retail centres by locating appropriate retail developments in line with the retail hierarchy
- 5.12 Policy CFS/2 sets out the retail hierarchy and identifies Llandudno as the Sub Regional Centre. Paragraph 4.5.3.5 of the Plan states that Llandudno's role as sub regional centre attracts a large number of shoppers from the area.
- 5.13 In accordance with Planning Policy Wales; Edition 10, the plan recognises the need to promote the retail function in Llandudno and provide a range of shopping, commercial and leisure opportunities as well as places of employment and social interaction.

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- 5.14 The application site is located in the primary shopping area of Llandudno and the proposed hotel use, with associated retail and restaurant uses and business/ gym provides a range of uses to support a vibrant, viable and attractive centre.
- 5.15 Policy CFS/3 supports A1 uses at ground floor in the Primary shopping Area. The application provides 3 units to support the main hotel development. The application seeks a flexible use for the units so that they are able to provide retail or restaurant use (A1 and A3). This flexible response will ensure the site and units are able to adapt to the changing retail pressures and patterns in the coming years in accordance with the proactive response encouraged by Planning Policy Wales.
- 5.16 A similar approach is proposed to the business/ gym unit where a B1/ D2 use is sought. The proposed uses at first floor level of the contemporary extension will enable a range of occupiers to complement the leisure and tourism objectives of the scheme.
- 5.17 The proposed mix of uses to support the proposed 90 bed hotel will provide a diverse range of uses which will add to the vibrancy and viability of the centre and proposed scheme. The proposed flexible approach to the units providing a mix of retail, food and drink, and business or gym will help to promote the economy of Llandudno and its role as sub regional centre.
- 5.18 It is considered that the proposed development of a 90 bed hotel with restaurant and a further four units provide a range of uses will enhance the vitality and attractiveness of the scheme and Llandudno.

Tourism and Recreation Statement

- 5.19 Policies TOU/1 and TOU/2 of the Plan support sustainable tourism. Permission was granted for a 63 bedroom hotel in 2018. The application proposal seeks to increase the number of bedrooms up to 90 bedrooms. The increased number of bedrooms reflects an identified requirement for additional rooms to meet expected demand and support the economy. The proposed units whether in retail or restaurant use will provide further diversification to the economy in accordance with Policy TOU1/
- 5.20 Policy TOU/ 2 relates to new sustainable tourism and recreational development. In accordance with the policy, the proposed hotel accommodation provides new high quality hotel accommodation. The new hotel will provide year round accommodation in an accessible location benefiting the wider economy so that tourists are able to access the range of tourism facilities and activities available in the area throughout the year.

Flood Risk

- 5.21 The site is within the TAN15 C1 flood zone where the proposed development is considered to have an overall highly vulnerable use.
- 5.22 The application is accompanied by a Flood Consequences Assessment which has been updated since the previously approved document which accompanied the extant scheme (0/44478).
- 5.23 The FCA identifies that the extant scheme was classified as less vulnerable, whereas the introduction of sleeping accommodation at upper ground floor level proposed in this application has increase the classification to highly vulnerable.
- 5.24 The FCA notes that the extant scheme (0/44478) has implemented a range of mitigation measures including increasing the finished floor level of the upper ground floor is 6.915m AOD.
- 5.25 Consultation with the Flood Management Team at Natural Resources Wales have confirmed that the previously proposed approach in the extant scheme regarding flood

risk mitigation from all sources of flooding are sufficient to provide flood mitigation for the proposed development. These measures include;

- Increased floor levels on the upper ground floor in excess of the extreme sea levels including climate change;
- No increase in vulnerability classification on the lower ground floor level compared to the extant scheme;
- Registration with Floodline Warnings Direct;
- Internal access from the lower and upper ground floor levels to a 'safe haven' on the levels above;
- A flood management plan to be prepared for the site;
- Incorporation of demountable flood barriers to be set 600mm above surrounding ground levels.
- Incorporation of cut off drains;
- Tanking of the lower ground floor;

5.26 Section 10 of the FCA relates to surface water management and concludes that the conditions discharged in relation to the previous planning approval 0/44478 adequately address surface water management for the site.

5.27 The FCA includes a justification statement which concludes that the development is able to incorporate measures to protect the property against flooding. The implementation of all the mitigation measures will mean that the development will be safer in terms of tidal flood risk than previously and the justification test is therefore satisfied.

5.28 The FCA concludes that the report demonstrates that the proposed development for which permission is sought will be safe without resulting in an increase in flood risk to the site or surrounding area. The application proposal therefore meets the requirements of TAN 15 and location policies NTE 8 and NTE10.

Residential Amenity

5.29 The potential impact on residential amenity of the proposed development has been considered previously and any potential impacts can be mitigated through the imposition of appropriate conditions if necessary.

Design

5.30 Policies CTH 1 and 2 seek to protect and where appropriate enhance cultural and heritage assets. The application is accompanied by a Design and Access Statement and a Heritage Statement which provide details of sympathetic reconstruction of the building facades. Plans previously approved detailing specific façade and window details and features and the proposed reconstruction methods have been included with this application despite the works have been completed.

5.31 This application results in the removal of a previously approved glazed entrance to the Vaughn Street façade. It is considered that the removal of this element from the scheme results a benefit and enhancement to the listed building and conservation area in accordance with the local policies.

5.32 The proposed minor extensions to the rear of the building at first floor level is not considered to result in any negative impact on the character or appearance of the Listed Building or conservation area.

5.33 It is considered that the proposed minor amendments to the extant do not result in any negative impact on the heritage assets and indeed, the removal of the glazed entrance

results in a benefit to the listed façade. It is considered the proposals comply with relevant national and local development plan policies.

Highways

- 5.34 The application is supported by a Transport Statement which considers the potential transport and highways impact of the proposed development, specifically with regard to the additional bedrooms proposed in this application.
- 5.35 The site is well located in terms of public transport services and pedestrian linkages. The statement concludes that the redevelopment of the site will result in a negligible increase in vehicle movements that will not result in any material impact on the safety or operation of the adjacent highway network.
- 5.36 The application proposal accords with national and local policy and will not result in any severe impact on the highway network.

Community and Linguistic Statement

- 5.37 Policy CTH/5 states that a Community Linguistic Statement should accompany commercial or tourist development with an area of 1,000 square metres or more. A Supplementary Planning Document entitled 'The Welsh Language' provides further information on the requirements of the Statement.
- 5.38 The application will provide a 90 bedroom hotel with associated restaurant together with a mix of retail/ restaurant units and a gym/ business unit. Together this new leisure/ tourism development will create opportunities for the Welsh language to be promoted in the community and to visitors to the scheme.
- 5.39 The development is expected to provide up to 90 new full time equivalent jobs, which will be sourced locally. The application proposal provides year round benefits to the economy and so the proposed jobs are long term jobs.
- 5.40 Benefits to the wider economy include, the provision of year round accommodation for visitors to the area so that a range of leisure and tourist activities can be easily accessed throughout the year.
- 5.41 The proposed development will provide a range of new local employment opportunities that will benefit Llandudno and the wider economy. The proposed development will provide a range of opportunities to benefit the Welsh language within the community in accordance with Policy CTH/5.

Public Application Consultation

- 5.42 In accordance with Article 4 of Part 1A of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, pre application consultation has been carried out.
- 5.43 The application is accompanied by a pre application consultation report (PAC), the report contains the following information;
- A copy of the site notice;
 - A declaration that the site notice was displayed in accordance with the statutory requirements for no less than 28 days;
 - A copy of the notice given to the owners and occupiers of the adjoining land;
 - Copies of all notices provided to councillors, town and community councils, and specialist consultees;
 - A summary of all the issues raised in response to the statutory publicity; and

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- Copies of all responses received from specialist consultees with an explanation of how each response has been addressed by the developer.
- 5.44 The report demonstrates that the statutory requirements and legal obligations have been fulfilled and that the consultation responses received have been considered and the planning documents updates as necessary.

6. Conclusions

- 6.1 This Planning Support Statement has been produced following instructions from Tudno Developments Limited to support the full planning application for the redevelopment of the former Tudno Castle Hotel site to provide a hotel with up to 90 bedrooms and associated restaurant, 3 units for restaurant or retail use and a business or gym unit together with car parking and associated works.
- 6.2 The application site benefits from an extant consent relating to the demolition of the former Tudno Castle Hotel and redevelopment of the site for a 63 bedroom hotel, 5 restaurant units and a business/ gym unit, including the recreation of the Mostyn Broadway and Vaughan Street facades.
- 6.3 Redevelopment of the site under the extant consent began in 2018 and is substantially complete as shown in the photographs accompanying the application. The proposed development subject to this application relates to relatively minor external amendments and internal reconfigurations to provide the required type and quantum of uses necessary as a result of changes to the economic climate.
- 6.4 The proposed development complies with national and local policies and the principle has been established with planning permission granted in March 2018.
- 6.5 The proposed scheme represents sustainable development and new investment to provide a successful scheme which responds to current economic circumstances. The completed development will provide economic and social benefits to the local area as well as resulting in a positive impact on the wider area.