

Section 55 Town and Country Planning Act

Design Heritage and Access Statement

Change of use of existing building from Outdoor Education Centre (Class C2) to Hotel (Class C1)

Marl Hall, Marl Ln, Llandudno Junction LL31 9JA

Site Information

Consultant	Jonathan McDermott
Client	Craig Lambie
Site Address	Marl Hall, Marl Ln, Llandudno Junction LL31 9JA
LA	Conwy
Description of Development	Change of use of existing building from Outdoor Education Centre (Class C2) to Hotel (Class C1)
Pathway (PD/Application/Appeal)	Planning Application

Constraints Review

Flood Risk Zone	1
Contaminated Land	No
Tree Preservation Order	No
Heritage Assets	Marl Hall including terrace at front - GD II Listed
Noise Abatement Areas	No
Explosive Hazard Areas	No
Area of Outstanding Natural Beauty	No
Special Protection Area	No
Site of Special Scientific Interest	No
RAMSAR Convention Site	No
Site of Importance to Nature Conservation	No
Article 4(2) Directions	No

Local Policy Requirements

Local Plan/Core Strategy

Conwy

Effective Policies in Development Control

Conwy Local Development Plan 2007-2022
Adopted October 2013

Policy DP/1 - Sustainable Development Principles
Policy DP/2 - Overarching Strategic Approach
Policy DP/4 - Development Criteria
Policy DP/5 - Infrastructure and New Developments
Policy DP/6 - National Planning Policy and Guidance
Policy TOU/1- Sustainable Tourism
Policy TOU/2- New Sustainable Tourism and
Recreational Developments
Policy CFS/15 – Education Facilities
Policy CTH/2 – Development Affecting Heritage Assets

SPG/SPD's

None relevant

Report Date

12 April 2023

1. Introduction

1.1. The application site relates to a vacant former outdoor education establishment with associated buildings and car parking located within woodlands to the east of Marle Lane. The site is at the edge of the settlement of Llandudno Junction and within the rural area.

About Town Planning Expert

1.2. Town Planning Expert is a general needs planning consultancy formed in 2012 and practising as a Chartered Planning Practice. Town Planning Expert is instructed to submit a planning application for development as set out below.

Our VICTORY © Framework

1.3. Our VICTORY Framework applies a policy, plan lead, approach to development with the intent of gaining planning permission in a manner that complies with National and Local Planning Policy in accordance with S38 of the Planning and Compulsory Purchase Act 2004.

The Development Proposed

1.4. Planning permission is sought for the change of use from an outdoor education centre within Class C2 to a Hotel within Class C1.

Executive Summary

1.5. The Adopted Local Plan and PPW make clear that the use of the property as a hotel to support the tourism industry within Conwy can be supported. Further, this may be done without impact on the special architectural or historic interest of this Grade II Listed Building or without further intrusion within the countryside. As such the development is considered acceptable in this instance.

2. National and Local Development Frameworks.

Planning Policy Wales

2.1. Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. The present PPW is at version 11 and was published in February 2021.

Local Policy

2.2. The relevant policies are located within the Conwy Local Development Plan 2007-2022 Adopted October 2013

2.3. The applicant sets out below their reasons why this development complies with the noted policies in full.

Policy	Comment
Policy DP/1 - Sustainable Development Principles	The development seeks the re-use of the existing building and the provision of new employment opportunities which meets the three pillars of sustainability.
Policy DP/2 - Overarching Strategic Approach	The development accords with the overarching strategic approach.
Policy DP/4 - Development Criteria	Where relevant the proposal complies with the requirements of this policy.
Policy DP/5 - Infrastructure and New Developments	The developer recognises the requirements of policy DP/5 and will seek guidance from the LPA on the requirements to contribute in this case.

Policy DP/6 - National Planning Policy and Guidance	The development complies with the requirements of the PPW.
Policy TOU/1- Sustainable Tourism	The proposal is for a new tourism use that will support the aspirations of policy TOU/1.
Policy TOU/2- New Sustainable Tourism and Recreational Developments	The proposal complies with paras a) to j) of part 1 of this policy and is therefore compliant.
Policy CFS/15 – Education Facilities	The existing building is an residential outdoor education centre within Class C2. The policy is silent on the loss of this form of education establishment and as such there is no policy presumption against the re-use as a hotel.
Policy CTH/2 – Development Affecting Heritage Assets	The proposal seeks the re-use of the existing building and the effect to the special architectural or historic interest is discussed within the heritage assessment appended below.

3. The Planning History

3.1. There are no applications relevant to this proposal that are available within the public domain.

4. Site, Context and Comparable Forms of Development

4.1. Said by Robert Williams to have been built in 1661, dated by a beam in the hall. However the core of the present house is essentially a Georgian enlargement of the early C18. It was badly damaged by fire in the mid C18 and remained derelict and roofless throughout the C19 (as shown in a painting of the 1870s and on the 1890 Ordnance Survey), except for the E wing, which was the only part of the house that remained inhabited. From 1894 it was rented by the

Birmingham Saturday Club, who later purchased, refurbished and rebuilt the house, with extensions at the rear, which opened as a convalescent home in 1903. It was a nursing home from 1965 and since 1971 has been an outdoor education centre.

4.2. Marle Hall OEC, established in 1971 by Warwickshire County Council, provided high quality residential outdoor education courses to all age groups, using the North Wales coast and the Snowdonia National Park. The OEC closed on Friday 22 October 2021.

4.3. The site is within an area made up of 2 and 3-storey buildings and there are comparable 3 storey buildings to either side, front and rear of the application site.

5. The Development Team

5.1. Middle Park Projects is a project management and sourcing company for commercial conversions.

5.2. Mainly serving our own projects, we work with our investors on medium sized developments of up to £5M. We have over 15 years experience in property, with over 3 years in project management and development, from finding and analysing a great deal to project managing the build to get the property on the market.

6. Alternative Forms of Development Considered

6.1. The existing building comprises a Grade II Listed former outdoor education centre within Class C2 of the Wales Use Classes Order. Class C2 as a use class includes a variety of other use classes including, but not limited to:

Residential care homes,
hospitals,
nursing homes,
boarding schools,
residential colleges and training centres.

6.2. This approach is supported by Regina (Mansell) v Tonbridge and Malling Borough Council [2017] EWCA Civ 1314.

7. Constraints to Development

7.1. The existing building is not within a Conservation Area and not within an established flood risk zone.

7.2. The existing building is Listed at Grade II and the effect of the development on the special architectural or historic interest of the building are discussed within the Heritage Assessment below.

7.3. The site is outside of the settlement policy boundary and within areas safeguarded for exploitation of Hard Rock Reserves and Sand & Gravel under policies MWS/1, MWS/2 & MWS/3. Given that the building is Listed and therefore protected from demolition unless in the national interest these policies are not considered an impediment to the re-use of the building proposed.

8. The Principle of Development

8.1. The existing building comprises a vacant residential outdoor education centre within Class C2 of the Wales Use Classes Order. Policy CFS/15 of the Local Plan is directed towards approving new educational facilities instead of protecting existing redundant facilities stating:

Policy CFS/15 – EDUCATION FACILITIES

Development Proposals for new schools during the Plan period will be supported providing they are in accordance with the Development Principles.

8.2. As such the loss of the existing education use is not contrary to policy CFS/15.

8.3. Policies TOU/1 and TOU/2 of the Local Plan set out the council's need and strategy for new tourism uses stating:

STRATEGIC POLICY TOU/1 – SUSTAINABLE TOURISM

The Council will promote a sustainable tourism economy by:

- a. Supporting, in principle, proposals for new high quality all-year round sustainable tourism development that diversifies the economy and encourages cross-boundary links with

- neighbouring authorities, in line with [Policy TOU/2 – ‘New Sustainable Tourism and Recreational Development’](#);
- b. Resisting proposals that would result in the loss of serviced accommodation, in line with [Policy TOU/3 – ‘Holiday Accommodation Zone’](#);
 - c. Control the development of both new sites and extensions to existing sites for chalets, static and touring caravans and camping within the Plan Area, in line with [Policy TOU/4 – ‘Chalet, Caravan and Camping Sites’](#);
 - d. Support, in principle, proposals to extend the holiday season in off-peak periods for existing chalets, static and touring caravans and camping sites whilst sustaining environmental and heritage qualities as set out in Policy TOU/4;
 - e. Improve connectivity by supporting the delivery of improved links at Foryd Harbour, improvements to the Wales Coastal Path and through the Public Rights of Way Improvement Plan in line with [Strategic Policy STR/1 – ‘Sustainable Transport, Development and Accessibility’](#) and Policy TOU/2;
 - f. Support, in principle, the establishment of new or converted high quality (4 and 5*) hotels which broaden the range of accommodation available in line with Policy TOU/2.

Policy TOU/2 – NEW SUSTAINABLE TOURISM AND RECREATIONAL DEVELOPMENT

1. New high quality sustainable tourism and recreational development within the Urban and Rural Development Strategy Areas will only be supported provided all the following criteria are met:
 - a. The proposal represents an all year-round high quality tourism offer which provides a range of tourism facilities and leisure activities;
 - b. The proposal is appropriate in scale and nature to its location and demonstrates resource efficient design;
 - c. The proposal is supported by evidence to demonstrate that there would be local employment benefits in terms of the number and range of jobs;
 - d. The proposal is sustainably accessible and encourages the use of non-car based transport;
 - e. The proposal makes use of any suitable existing buildings in preference to new build and previously developed land in preference to greenfield sites, where appropriate;
 - f. The proposal would not have an unacceptable adverse impact on occupiers of neighbouring properties;
 - g. The proposal would support and extend the range of facilities on offer within the County;
 - h. The proposal would assist the Council’s regeneration objectives of Conwy;
 - i. The proposal meets other related policies in the Plan;

- j. The proposal would not appear obtrusive in the landscape and is accompanied by a detailed landscaping scheme and, where appropriate, a Landscape and Visual Impact Assessment.
2. New high quality holiday accommodation will only be supported where it forms an ancillary or complementary part of an existing or proposed new tourism development scheme and meets all of criteria 1 a) – j) above. There will be a presumption against the development of new static caravan sites.
3. Land at the former Dolgarrog Aluminium Works will be safeguarded for the purposes of an all year round sustainable tourism and recreation facility.

8.4. In respect to both policies the development would see the re-use of a pseudo tourism use as a residential outdoor education centre to a formal tourism use as a hotel and would therefore support the Council's drive towards providing new high quality tourism within Conwy.

8.5. Furthermore the proposal would see the sustainable re-use of a Listed building that would meet all of the requirements of parts A-J of TOU/2 in that:

- a. The proposal represents an all year-round high quality tourism offer which provides a range of tourism facilities and leisure activities;
- b. The proposal re-uses an existing building and is therefore appropriate in scale and nature to its location and demonstrates resource efficient design;
- c. The proposal is supported by evidence to demonstrate that there would be local employment benefits in terms of the number and range of jobs;
- d. The proposal comprises the re-use of an existing building which is sustainably accessible and encourages the use of non-car based transport;
- e. The proposal makes use of an existing listed buildings in preference to new build.
- f. The proposal would not have an unacceptable adverse impact on occupiers of neighbouring properties;
- g. The proposal would support and extend the range of facilities on offer within the County;
- h. The proposal would assist the Council's regeneration objectives of Conwy by re-use of the existing building;
- i. The proposal meets other related policies in the Plan;
- j. The proposal re-uses the existing building and by definition would not appear obtrusive in the landscape.

8.6. As such the development is acceptable in principle.

9. Site Capacity Assessment.

9.1. This application seeks the change of use of this Listed Building to form a Hotel within Class C1. As such there is no alteration proposed to the scale, layout, amount or landscape setting of the building.

Amenity of adjoining, surrounding and proposed occupiers.

9.2. The nearest adjoining occupiers are located to the south and west of the application site. Considering the position of the existing road access to the north of these buildings onto Marl Lane and the distance between those properties and the existing building it is submitted that the use will have no greater impact than the former use as an residential outdoor activity centre within Class C2 in terms of loss of light, outlook, privacy and a perceived sense of enclosure.

9.3. The parking area remains as existing and would not result in a greater noise generator over and above the existing use of the building.

9.3. Turning to the proposed occupiers the development provides an adequate level of amenity.

10. Heritage Impact Assessment

10.1. Marle Hall is a Listed Building at Grade II. The listing for this building states:

Exterior

Georgian style former convalescent home of 2 storeys and attic, of coursed freestone on a pebble-dashed plinth, with steep slate roof on a stone cornice. It has 3 stacks behind on the L side and another on the L-hand wing, all tall brick shafts with 2 round-headed panels. Rainwater goods have been retained, dating from the early C20 conversion.

The W entrance front is 7 bays in the main range with projecting hipped wings at the ends of 2 bays and 3 storeys. The central entrance has a moulded freestone surround of lighter brown stone, with bead-and-reel border and a pediment, to double panel doors under a small-pane overlight, within panelled reveals. Windows are 15-pane hornless sashes. On the eaves is a modern steel fence, behind which are 2-light casement windows to gabled dormers. Across the main range is a lean-to veranda on cast iron posts supporting a moulded wooden beam, with glazed roof. Wings both have

15-pane sash windows to ground and first floors. The L-hand (N) wing retains 9-pane sashes in the 2nd floor. In the R-hand (S) wing are replacement windows with plain glass to the L bay and 4-pane sash window to the R bay. In the return facing the main front, the R-hand (S) wing has a ground-floor half-glazed door in a former window opening, the upper 6-pane sash of which is now the overlight, 15-pane sash to the 1st floor and 2-light 2nd floor window opening to a balcony across the angle of wing and main range. The return of the L-hand (N) wing has 15-pane and 9-pane sashes similar to the front.

The L-hand (N) wing is brick in the side wall and of C18 fabric, except for the upper storey which has been rebuilt. Openings are grouped 1+3 to L and centre, all under flat arches. Windows are 15-pane sashes to ground and 1st floors, 9-pane to 2nd floor, except for inserted escape doors to the L end in 1st and 2nd floors, which in the 1st floor retains the original 6-pane upper sash as an overlight. The rear of the N wing is rubble stone. On its R side are 15-pane and 9-pane sashes to 1st and 2nd floors, while in the ground floor a door has been inserted, retaining an original 6-pane upper sash as the overlight. On its L side is a brick projection with similar sash windows.

The S wing is shorter than the N wing. Its side wall is whitened rubble stone to ground and 1st floor, brick to the 2nd floor. It has small replacement 1st and 2nd-floor windows. Behind it is a hipped 2½-storey lean-to, with lower 2-storey projection facing the yard, both with replacement glazing. Further behind is a lower 2½-storey gabled 2-window wing with replacement windows. It has an early C20 1-storey parallel range of rubble stone and larger quoins that continues around the rear as a lean-to, with small-pane casements in mullioned freestone surrounds.

The rear of the main range is rubble stone with light-brown freestone quoins, dressings and moulded cornice similar to the front. It has a central half-glazed panel door under a segmental head with mullioned overlight and leaded glazing. It is flanked by double-transomed 2-light windows, below a 6-light mullioned 1st-floor window, all with leaded glazing. Two superimposed flat-roof dormers have 2-light and 6-light windows. Set back on the R is a single bay with 15-pane sash windows and 2-light flat-roof dormer. To the R and L are rear wings, spanned by a coped dwarf wall and gateway with ball finials, enclosing a small rear courtyard.

On the L side of the rear entrance is a gabled rear wing of rubble stone, tooled-stone quoins and dressings, and some freestone dressings. It has 3-light mullioned windows with steel-framed casements, and in its side wall facing the main rear entrance is a reduced external stack. In its S roof slope is a large flat-roof dormer. On the R side of the back entrance is a 3-storey T-shaped rear wing of rubble stone with rock-faced and freestone dressings, and moulded cornice similar to the main range. It has leaded glazing to windows in stone surrounds, including 4-light windows in the rear wall, and added escape stairs on the N side. To the N of this wing are 15-pane and 9-pane sash windows in the main range.

In front of the main range and N wing is a raised terrace shown on the 1890 Ordnance Survey. It comprises a buttressed retaining wall of coursed rock-faced stone and moulded coping. In the centre is a convex arc of stone steps. At the R-hand end the wall returns and abuts the main range. At the L end the wall returns into the bank opposite the end of the N wing.

Interior

The entrance hall is finished with scribed plaster. It has a rear lateral fireplace with a segmental corbelled arch below a raked hood. To its R is a wide Tudor arch, with foliage spandrels, leading to the stairway. Above it is a moulded string course. The ceiling has 2 cross beams. Doorways to the L and R have wooden surrounds and segmental pediments, panelled reveals and Arts-and-Crafts influenced half-glazed doors with leaded lights.

The full-height dog-leg stair has Jacobean style fretwork balusters, square newels and retains some moulded finials. At the base of the stair, on the L-hand side, is a wooden segmental arch to a half-glazed door with side panels.

Reason for Listing

Listed for its special architectural interest as primarily an early C20 convalescent home of definite character, with significant earlier origin as a country house.

10.2. The key test in this case is whether the proposed development would sustain or enhance the special architectural interest of the building.

The Existing Condition

10.3. The existing building is vacant having closed in 2021 and remained so to this day. The external and internal arrangement retains those features outlined within the listing however internally the building has been retrofitted by its previous owners to make it compatible with its former uses as a nursing home and a residential outdoor education centre. This has included internal modern partitioning throughout the building to form interior rooms out of larger spaces and communal bathrooms.

The Intervention and Development Proposed

10.4. The proposed development seeks the change of use of the existing building by the re-use of its interior in a much more sensitive way.

10.2. In this case the overriding justification for both the use of the building and the interventions to enable that use to be brought forward by far and away overrides the minor impact to the remaining special architectural and historic interest of this building.

10.3. It is considered that the proposed development would comply with the relevant policies within the Local Development Framework.

11. Access Appraisal

11.1. The existing site includes an substantial car park which is envisaged to meet the needs of visitors to the hotel.

11.2. The impact of the development on transport and highways is considered not to be detrimental or harmful site that the proposed development would not result in any parking that would be detrimental to highway safety.

12. Conclusion

12.1. Within the planning balance the proposed development offers an opportunity to provide a hotel in a manner which would have a positive effect on the character and appearance of the streetscene, impact on the amenity of adjoining and surrounding occupiers and would have wider public benefits from bringing new sustainable forms of tourism to the area.

12.2. As such it is submitted that planning permission could be granted for this development and the applicant looks forward to discussing the matter with the LPA.