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LATE REPRESENTATIONS

Committee PLANNING COMMITTEE

**Date and Time
of Meeting** WEDNESDAY, 1 MARCH 2017, 4.00 PM

Please see attached Late Representation Schedule received in respect of applications to be determined at this Planning Committee

Late Representations (*Pages 1 - 24*)

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LATE REPRESENTATIONS SCHEDULE
PLANNING COMMITTEE – 1ST MARCH 2017

PAGE NO. 62	APPLICATION NO. 16/2731/MJR
ADDRESS:	LAND TO THE NORTH OF CARDIFF CENTRAL RAILWAY STATION AND SAUNDERS ROAD, SOUTH OF WOOD STREET AND WEST OF GREAT WESTERN LANE, CARIDFF
FROM:	Email dated 28.2.17 from Cllr. Clarke, raising concerns.
SUMMARY:	<p>Many of the concerns raised by the Joint Task and Finish Inquiry of the Economy and Culture and Environmental Scrutiny Committees not addressed, as follows:</p> <p><i>Between 28 December 2014 and 22 September 2016 the Joint Task and Finish Inquiry of the Economy and Culture and Environmental Scrutiny Committees held at least 7 meetings to consider the Cardiff Central Transport Interchange.</i></p> <p><i>During these meetings I raised many concerns. These included:</i></p> <ul style="list-style-type: none"> • <i>whether the bus/coach station would be big enough to accommodate population projections and achieve a 50:50 modal shift</i> • <i>details of where the anticipated on-street tramway will run as outlined in the draft Cardiff transport strategy</i> • <i>the provision of a replacement car park following the demolition of the National Car Park</i> • <i>levels of air pollution</i> • <i>implications for cyclists</i> • <i>when the new bus station would actually be built</i> <p><i>I am shocked that this current planning application has not addressed many of these issues. For example:</i></p> <ul style="list-style-type: none"> • <i>Size of bus/coach station - far from increasing the bus capacity within the interchange the planning report recommends, "restricting the number of buses using the interchange" (Paragraph 8.60 in the report). Mr Stewart Burgess reiterates these concerns in his objection dated 22 February 2016.</i> • <i>In depth detail of where the anticipated on-street tramway will run is not clear</i> • <i>Replacement car park: Arriva Trains Wales comments that they are "concerned at the lack of meaningful and formal proposals coming forward for the permanent replacement of the 42 spaces in the Saunders Road car park" and so "have no alternative but to raise objections". (Paragraph 6.11)</i> • <i>Air pollution levels: Public Health Wales comment that: "It is possible that people in the vicinity of the bus station manoeuvring area could be exposed to hourly concentrations of NO2 that are over four times the short-term air quality objective. Also, emissions from an associated energy plan do not appear to have been assessed". (Paragraph 6.20)</i> • <i>Implications for cyclists - Concerns still remain about the provision for cycle parking and cyclists safety.</i> • <i>Completion date of bus station - It is very likely that as many concerns still need to be addressed and various more detailed reports produced there will be further delays to the completion date of the bus station".</i> <p><i>It is imperative that the above issues and other concerns raised by the scrutiny committee are addressed. Please could my serious concerns be taken into account by the Planning Committee.</i></p>
REMARKS:	1. The bus station has been designed to maximise the capacity of the site and will function as an efficient interchange. The bus element of the interchange should be seen not solely as the interchange itself, but also as a network of satellite stops on Wood Street and Lower St Mary Street. The efficiency of the facility will be greatly enhanced by

	<p>low dwell times for buses, as opposed to the previous bus station which was used as a layover facility. This will enable a higher throughput of services. The interchange is supported by ongoing work in Cardiff to improve bus journey times and journey time reliability to deliver improvements to the bus network as a whole and allow the interchange to function efficiently and enhance the attractiveness of bus travel.</p> <ol style="list-style-type: none"> 2. The interchange will support the LDP target of achieving a 50% sustainable travel mode share by significantly enhancing the quality of bus provision in the city, including interchange between modes. It should be noted that bus operators have advised that there is existing spare passenger capacity on many of their services, so increase in bus passenger demand does not automatically equate to further increases in bus movement. 3. The metro project is being led by Welsh Government and a concept plan of the routes which could potentially form part of the Metro network has been published. The next phase of the Metro project will focus on modernising the core Valley Lines and the wider South Wales rail network. Development of other routes featured on the Metro concept plan will require extensive technical work to determine the feasibility and detail of different routes and their potential alignments. Therefore at this stage there are no detailed plans of specific routes and it is not possible to be certain about the timescales for delivery. 4. The interchange does not jeopardise potential future on-street tramway provision on Wood Street and/or Penarth Road. Indeed the provision of the interchange building complements future Metro proposals as it will consolidate interchange between modes. 5. ATW's objection to the loss of their car park is addressed in paragraph 8.34 of the report. A condition requires replacement car parking to the south of the station on land owned by the developer. 6. Air Pollution is addressed in paragraphs 8.21 to 8.26 of the officer's report and fully assessed in the Environmental Statement. Air pollution levels in the bus station concourse area and emissions from an associated on-site combustion plant are controlled by condition. 7. Cycle parking and safety of cyclists is addressed in paragraphs 8.10 and 8.11 of the officer's report 8. Projected completion date of bus station is not a planning matter.
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ADDRESS:	LAND TO THE NORTH OF CARDIFF CENTRAL RAILWAY STATION AND SAUNDERS ROAD, SOUTH OF WOOD STREET AND WEST OF GREAT WESTERN LANE, CARIDFF
FROM:	Objection dated 28.2.17 from Mr. Max Wallis, Cardiff Cycling Campaign.
SUMMARY:	<p>Mr. Max Wallis, on behalf of the Cardiff Cycling Campaign, objects as follows:</p> <p><i>'We object that the applicants did not consult cyclists under the new (statutory) pre-application public consultation, as we detailed. The report is false to state (8.90) that consultation was carried out by the applicants in accordance with 2016 legislation in respect of the cycle-hub part of their proposal. The applicant's Pre-Application</i></p>

Consultation report of consultations shows none with cycling reps among the formal pre-application consultations. The applicant and the case officer cite consultations organised by Sustrans in 2015 and their report of Dec.2015, all before the new legislation. The Cycle Hub has changed completely from options considered in 2015. Cycle access routes that are in the present planning application were not considered in 2015.

The case officer response on the point (correspondence appended below) gave the excuse “Cyclists and their representatives are not a formal pre-application consultee”. The Council Access Focus Group was consulted in respect of disabled users; the Council’s Cycling Liaison Working Party was ignored. The Council did not supply any list of specialist consultees when we asked; if none exists, they are at fault – in practice including the Access Group but not the CLWP is discriminatory. The applicant is well aware of cycling interest groups; though they included Sustrans for 2015, their statement does not claim a single cycling group for the 2016 formal pre-application consultation. Their statement “pre-application consultation undertaken by the applicant has met and exceeded the requirements of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 ” (6.1) is wholly misleading. We object to the officers’ report stating - without addressing the counter-evidence - that this “is considered acceptable”. The applicants have clearly not complied with the consultation requirements of the TCPA (as amended 2016) in respect of ‘specialist consultees’ on cycling aspects.

Detailed Objections

1. Air Pollution not improving, even worsening due to the development:

It’s unacceptable to propose to restrict the numbers of buses on grounds of air pollution exceeding legal standards. Cyclists are particularly vulnerable to air pollution; a cycleway is designed along Wood St where pollution is excessive.

The Council must under the law consider other ways to limit and reduce air pollution, and require the applicant to finance them.

We agree with Public Health Wales and Cardiff & Vale University Health Board that a sustainable integrated transport interchange has to improve air quality, reduce human exposure to transport emissions and encourage active travel and use of environmentally sustainable public transport. We support their opposition to the present proposals, noting that the on-street excessive air pollution discourages some from active travel and bus services.

As they say, it could make matters worse; and would most certainly hinder any efforts being taken to resolve existing problems.

We think the developer should be required to fund mitigation measures, including funds for low emission diesel buses and diesel taxis that frequent Cardiff central streets. Also consider

Cardiff changing their taxi licensing to incentivise low-emission taxis

a condition requiring the BBC car park operator to differentially penalise high NO2 diesel cars

re-siting the 210 car-parking spaces for the BBC to a site south of the rail station, as the ArrivaTrains car parking being proposed for the Brains site.

2. Supreme Court Ruling makes the proposals unlawful re. Air Pollution

*The Supreme Court ruled** (2 Nov.2016; Mr Justice Garnham) that the UK government had failed to take measures that would bring the UK into compliance with the law “as soon as possible” and said that ministers knew that over optimistic pollution modelling was being used. It is therefore not lawful for Cardiff to rely on projections (known to be over-optimistic) that the unlawful levels of NO2 will come down; not lawful for the Council to plan bus and traffic changes that will not improve and possible worsen pollution levels.*

The ruling said that Defra’s 2015 Air Quality Plan failed to comply with the Supreme Court ruling or relevant EU Directives. That plan included Cardiff in draft but then dropped Cardiff from the list of cities proposed for “low-emission zones”, so Cardiff must now be considered for urgent action either on low-emission vehicle or other

traffic management measures.

The Council has had time to consider urgent action to conform with the Court ruling and meet Health authorities' opposition to the current Transport Interchange plans. Proposing to do nothing is "inconsistent" with taking measures to reduce NO2 pollution "as soon as possible" as the Supreme Court ruling requires.

** <http://www.documents.clientearth.org/library/download-info/high-court-ruling-on-clientearth-no-2-vs-ssefra-uk-air-pollution-plans/>

3. Unsegregated cycle lane in the westbound direction on Wood Street (1.38).
This will be 1.8m wide, with the general traffic lane at 3.2m wide This is unacceptable.

Cardiff's policy (draft Cycling Strategy) in conformity with the Active Travel legislation is to provide for segregated cycleways where feasible. It could be some form of 'soft' segregation. 1.8m width is inadequate; an effective width of 2.5m is required to permit safe overtaking, as required over distances over 50m .

The approved plans showed the cycle-lane on the north side of Wood St, apparently two-way. The current application covers only "Land to the SOUTH OF WOOD STREET". That segregated provision cannot be changed without following proper procedure, including advertising and consulting on the change.

One good reason is the claim to provide for possible metro-trams. The cycleway should reach the St Mary's Street cycle-route without crossing the tram-route (at its complicated Prince-of-Wales corner).

4. Metro-tram station on Wood Street

Saying there is space for metro-trams to run on Wood St without allocating space for a tram station is bad planning. Space is needed close to the Marland St corner with passenger routes to and from the bus station considered. The entrance may need widening for this extra complexity in walking movement. A departure Information Board is needed in this entrance hall, with space for people to read it while others pass.

It is quite wrong to move the promised cycleway into the space required for the Metro station and the northern passenger entrance to the bus station.

5. Cycle Hub: the proposal to use the space for 500 cycle-parking alone is unacceptable. All proposals for a 'Hub' have included facilities like repair space/service, sales workshop as well as secure storage (see Sustrans workshop 2015 given as evidence by the officer). These will not be economic, so a condition requiring the developer to be responsible for operating them into the future is needed.

5.22 The interchange proposals include an accessible (up to) 500 space public cycle hub to the southern end of the building, accessed via the south entrance off Saunders Road. The detailed fitting out and future management/operation of the cycle hub is subject to condition and for later consideration, the ultimate use of the space can therefore be tailored to provide a range of cycle parking and other cycle facilities, including the provision of accessible cycle parking and other enhanced facilities over and above simple cycle parking.

This is misleading as the proposed Conditions 14-15 do not cover 'enhanced facilities' or give any incentive to the owner/operator to provide any. A better use of the space/site might be cycle-hire and 'bike doctor' running repairs. The Conditions 14-15 should be re-written to cover 'enhanced facilities' and allow this alternative business use. They should require the applicant to make up for the loss of cycle-parking spaces in some other location, probably on the Brains site alongside the Network Rail/Arriva Trains car parking

The requirement of 'accessible cycle parking' needs to be specified and include non-standard bikes. The Active Travel guidance says non-standard bicycles, include:

- Bicycles with trailers for children or deliveries
- Tricycles, including those used by some disabled people
- Tandems with two or more seats
- Purpose built cycles for disabled people e.g. quadricycles and hand cycles

	<ul style="list-style-type: none"> • Recumbent bicycles • Cargo bikes (for carrying goods or children) <p>Condition 14 is inadequate, in covering only 'secure parking of bicycles'.</p> <p>The currently planned access through swing doors, past lifts, is unacceptable for cyclists, often with luggage; swing doors present especial difficulties for trikes and bikes with trailers. An access directly onto the outside street is needed. Cardiff Access group have pointed out the conflict between cyclists using the new hub and pedestrians using the interchange building.</p> <p>The Hub's street access should be designed to facilitate cycle-hiring and 'bike doctoring' from the forecourt.</p> <p>Design for event-day crowding on Central Sq, Event-day operation of the Transport Interchange is not yet described. It should be. The southern entrance to the Interchange may be need to be closed. But access to the Cycle hub could and should be kept open from Saunders Rd (to be kept open for buses). This is feasible with the direct Hub-entrance from the street that we propose – event-day operations should be considered in the design/positioning of this entrance.</p> <p>Design for high winds. Gusty westerly winds sweep across the rail-station frontage at present; these will hit the proposed doorway. A street access in the side of the 'Hub' is better, but needs a porchway for shelter while entering and leaving.</p> <p>6. Saunders Rd is an important cycle route into Central Sq. Cyclists need a) segregation from taxis and the taxi rank, and b) some informal designation of crossing of the main pedestrian flows between the rail station and Marland St and Saunders Rd.</p> <p>For event-day use of Central Sq for event crowds, Saunders Road should be used as access to the rail-station for normal usage by cyclists and pedestrians.</p> <p>7. reopened Great Western Lane Traffic Regulation Order to restrict it to access traffic only'; this allows cyclists to access the Hub and also use this route as Saunders Rd (as they do at present); this has not been assessed for cyclist safety.</p> <p>8. contraflow cycle lane on Penarth Rd under the railway bridge.</p> <p>1.8m is unacceptable as width, for a cycle lane with hard edge (raised pavement/railing); it suffices for Cathays Terrace only because it's offset from the car parking. An effective width of 2.5m is required to permit safe overtaking, as needed (cf. the uphill section slows up some cyclists well below the 10mph minimum)</p> <p>Current priority across Saunders Road to St Mary's Street needs to be retained.</p> <p>We consider it unacceptable to propose such substantial changes to use of the Penarth Road under a planning application for a quite separate site (defined as north of Saunders Road). Likewise, the earlier proposal under the Central Sq development to put a taxi-rank in the Penarth Road bus/cycle lane was unacceptable and never implemented.'</p>
REMARKS:	<p><u>Pre-application process</u></p> <ol style="list-style-type: none"> 1. The Sustrans workshop presented three case studies of cycle hubs in other cities to enable attendees to discuss likes and dislikes of other schemes being implemented elsewhere. At this workshop Fosters and Partners presented preliminary concept scheme options, including location of a significantly smaller cycle hub in the south-east corner of the development. The current proposals retain these principles incorporated in an improved design (and larger hub). 2. The routes to the cycle hub have not materially changed since 2015. The provision of shared surface and therefore routes through Central Square received planning approval in 2014, and the use of Saunders Road for a combination of buses, taxis, car park access and cycles has been part of scheme proposals prior to 2015. 3. The planning pre-application process, and statutory pre-application

process undertaken by the applicant, is described in paragraphs 3.1 to 3.6 of the officer's report. Cycling groups are not a formal pre-application consultee. As part of the pre-application process Sustrans, representing cyclists' interests, was consulted (see above).

Air pollution

4. Air Pollution is addressed in paragraphs 8.21 to 8.26 of the officer's report. Potential restrictions on bus movements are required to ensure that pollution levels in the City Centre AQMA are not made significantly worse as a result of the operation of the interchange.
5. Modelled NO₂ concentrations at existing receptor 9 (Vue Cinema, Wood Street), and proposed receptors A to E (Receptors within the various development plots nearest to Wood Street) are all below 40 ug/m³ in 2018 with and without the proposed interchange, therefore pollution levels along Wood Street cannot be considered excessive as it is within the air quality objective. The EIA has demonstrated that the air quality impact of the development proposals on Wood Street is not significant.
6. Measures to force bus operators, taxis, or the BBC to introduce low-emission vehicles cannot be conditioned or required by legal agreement as such measures are not necessary to make the development acceptable in planning terms. However in relation to bus operators part of the mitigation being considered includes differential charging for buses using the ITH based on their emissions.
7. The car park and the associated vehicle movements generated create negligible pollutant emissions and make little contribution to pollutant concentrations. Re-siting the car park would not have any discernible benefit to local air quality.
8. In terms of the Supreme Court Ruling, this relates to the statutory requirements of the UK and devolved Governments to achieve nitrogen dioxide (NO₂) annual average (AA) limit value (40ug/m³ AA) as set out in the EU Ambient Air Quality Directive (2008/50/EC). Our understanding is that DEFRA/ Welsh Government will issue revised action plans demonstrating measures to address any compliance failures, and that any such measures will be introduced as soon possible to enable compliance. Cardiff Council will work with Welsh Government in developing any proposals for the revised action plan.
9. In this local air quality assessment we have used a different model (AAQuIRE) and taken a conservative approach to the modelling where we assume background pollution levels remain constant in future years. The methodology has been agreed to be robust by the Council's Air Quality Officer.

Cycle lane widths

10. Local Transport Note 02/08 (LTN 02/08) specifies that *a minimum width of 1.5m may be generally acceptable on roads with a 30mph limit*. The Cardiff Cycle Design Guide (July 2011) draws on LTN 2/08. Section 5.7.2 states that the minimum width for on-street cycle lanes is 1.5m and the maximum width is 1.8m. Therefore a 1.8m wide cycle lane is in line with both LTN 02/08 and the Cardiff Cycle Design Guide. 5.8.7 of the Cardiff Cycle Design Guide states that *cycle lanes in excess of 2.0m, may be at risk of misuse, as their width may make them appear to be bus lanes or general traffic lanes*.

11. The Wood Street scheme has been agreed in principle as a preliminary design with the Council as the Local Highway Authority (LHA). The scheme will then be worked up in detail post planning permission, also in consultation with the LHA. The allocation of road space is obviously a balance between providing sufficient space for vehicles, including buses, pedestrians and cyclists. The design rationale for a 1.8m cycle lane width is clear in that it is in line with the Cardiff Cycle Design Guide and LTN 02/08. Further discussions on the design will be held between the applicant and the LHA post planning. This could consider reducing the public realm space to increase the cycle lane to 2.0m, as *cyclists can overtake each other within a 2-metre wide lane and easily remain within it when looking back to check for traffic, or when avoiding kerbside drainage grates etc* (LTN 02/08). This would need to be considered as part of the aforementioned balance between different user groups. As stated above, a cycle lane width above 2.0m would be problematic.

12. Works on the public highway will need to be approved through a Section 278 agreement, which includes advertising and consulting. The applicant and the LHA are both aware of this fact.

Metro

13. The future design of any tram route will need to provide appropriately for cyclists and demonstrate through a planning application, likely to be a Transport and Works Act Order (TWAO), that it will not have an unacceptable impact on cyclists.

14. The potential routes, or indeed locations for tram stations, for a future metro-tram are yet to be determined and do not have policy basis. It is therefore not appropriate to require the applicant to safeguard land for a “tram station”. The exact location and form of information boards and information dissemination in general will be determined post-consent. The key principles of the information strategy will include provision at entrances and regular intervals, and space being available for people to read while others pass. The design of the passenger concourse and public spaces will allow this to be achieved.

Cycle hub

15. It is considered that the space provided for the cycle hub is sufficient and the application submission confirms that as a minimum the space is sufficient to accommodate up to 500 cycle parking spaces. The fit out and operation, including review, of the hub is to be submitted and agreed as detailed in condition 15. The inclusion of cycle hire, non-standard bikes and Dr. Bike etc. facilities is not precluded and will be agreed and managed via discharge of conditions 14 & 15.

16. Direct cycle access onto Saunders Road has been considered and has not been possible due to level differences. The intention is that cyclists will dismount at the edge of the building envelope, with signing/tactile paving provided to this effect, and wheel their bikes the short distance into the building. This will reduce conflict between cyclists and pedestrians. The width of the access points and public space is suitable to allow this to occur.

17. Event day operation has been considered and is detailed in the Transport Assessment, Chapter 3. The exact details of the operation of the ITH including cycle hub on an event day is yet to be determined. However the design allows for both buses to access

	<p>from Saunders Road and for the cycle hub to remain accessible.</p> <p><u>Saunders Road cycle route</u></p> <p>18. This is not the subject of this planning application as the design and operation of Central Square was approved in 2014, and the connection between Saunders Road and Central Square is not proposed to be altered. Central Square public realm will be designated as shared use by cyclists and pedestrians and has been designed with sufficient width to accommodate this safely. Condition 17 requires submission of public realm and crossing details. Neither the applicant nor Council Transportation and Highways consider that the nature of Saunders Road presents a need for segregation for cyclists.</p> <p><u>Great Western Lane</u></p> <p>19. Great Western Lane is an adopted Highway. Any changes will be subject to appropriate traffic orders. Cyclists will have the option of alternative more attractive routes available to them including Lower St Mary Street/Saunders Road and the new public realm in Central Square.</p> <p><u>Penarth Road works</u></p> <p>20. These form part of the offsite highway enabling works. The proposed wider highway enabling works (see paras 1.36 to 1.42 of the officer's report) are required to achieve optimal access to the interchange, but are not necessary for the delivery and operation of the interchange building. The applicant has worked with the LHA to ensure that the off-site works are appropriate and that the scheme provides significant benefits to the Cardiff transport network. The responsibility for delivering the enabling works falls to the Council and will be the subject of further consultation and a Traffic Regulation Order.</p>
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ADDRESS:	LAND TO THE NORTH OF CARDIFF CENTRAL RAILWAY STATION AND SAUNDERS ROAD, SOUTH OF WOOD STREET AND WEST OF GREAT WESTERN LANE, CARDIFF
FROM:	Further objection dated 28.2.17 from Anne Greagsby, Cardiff & Vale Bus-Users Group.
SUMMARY:	<p>Anne Greagsby, on behalf of the Cardiff & Vale Bus-Users Group, objects as follows:</p> <p><i>'Objection to the Central Interchange proposal 16/02731/MJR over lack of proper consideration to physical links with the Rail Station</i></p> <p><i>Such a link is vital for an integrated transport interchange, recognised from the early outline plans. The proposed design includes provision for an overhead bridge from the Interchange building to the rail station. The amended plan includes the Central Square Visualisation which shows a canopy-covered walkway physically connecting the proposed development with the frontage of listed Booking Hall. This was seen as a significant addition in the Press report of the amended plan.</i></p> <p><i>Though it depends on use of land owned by Network Rail and their agreement in conjunction with their plans for changes to the Booking Hall, the provision of a sheltered walkway needs to be secured via a Section-106 condition.</i></p>

	<p>Impact on the listed building – on the setting of the Rail Booking Hall</p> <p><i>Both proposals – the Canopy-covered walkway and the overhead bridge – affect the setting of the Booking Hall. The Council has duties under the Conservation and Listed Buildings Act to consider such impacts.</i></p> <p><i>The Council has also omitted to advertise these impacts of the development on the Listed Building, as is required under the Act. In failing to consider the Council’s duties under the Planning (Listed Buildings and Conservation Areas) Act 1990, the officers’ report is wrong to recommend approval of this development.</i></p> <p><i>Sections 16 and 66 of the Act require authorities considering applications for planning permission ... which affect a listed building to have special regard to certain matters, including the desirability of preserving the setting of the building (Welsh Office Circular 61/96 Planning and the Historic Environment: Historic Buildings and Conservation Areas, s.11). The words “special regard” are established in case-law to mean that officers cannot presume that the conservation objectives will be outweighed by having the Walkway as a planning objective.</i></p> <p><i>Para. 8.18-20 of the Report covers impact on the setting of the listed buildings. It says The height and massing of the office building is designed to reduce the impact of the building on Central Square and on the setting of the listed station building. The office building is physically separated from the PRS building.</i></p> <p><i>It omits to consider physical links to the Booking Hall, perhaps because it (and the ES) took the plans without overbridge and canopy-covered walkway.</i></p> <p>Alternative for the walkway link</p> <p><i>The canopy-covered walkway is deficient in respect of the change in level (the Interchange building being significantly lower than the Booking Hall) and being open to winds, which can be strong and gusty. Adding shelter from winds would obstruct pedestrian and cycling movements between Saunders Road and Central Square.</i></p> <p><i>The alternative of a walkway in a shallow tunnel with escalator up inside the Booking Hall (or just outside it) has still to be considered. It may require a down-escalator inside the Interchange building.</i></p> <p>Conclusion</p> <p><i>One or more physical links between the Interchange and the Rail Station are envisaged and indeed required for a “world class” transport interchange. This requirement needs to be covered in a s.106 condition on the development. The Council duty to consider impacts of such physical links on the setting of the listed building, the station Booking Hal, have not so far been met. The sub-ground alternative that would have zero or minimal impact has not been considered, but would require modifications to the Interchange design.’</i></p>
REMARKS:	<ol style="list-style-type: none"> 1. Future integration with the railway station and the provision of additional interchange facilities and a covered link does not form part of the planning application. The matter is addressed in paras 8.32, 8.36 & 8.37 of the officer’s report. 2. The application was advertised on site and in the press as affecting the setting of listed buildings, and the character and appearance of the conservation area. See paragraphs 8.18 to 8.20 of the officer’s report.

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FROM:	Objection dated 28.2.17 from Anne Greagsby, Cardiff & Vale Bus-Users Group.
SUMMARY:	<p>Anne Greagsby, on behalf of the Cardiff & Vale Bus-Users Group, objects as follows:</p> <p><i>'The developers' promise of a "world class" interchange – in exchange for the valuable land donated from the old bus station – is not provided in the present scheme with facilities sized only to the bus-station users. The officers report 'forgets' to consider this, despite the Council Leader making the "world class interchange" claim on many occasions.</i></p> <p><i>Integrated transport is not provided in the present proposals, with no integration with rail information systems, no information on buses stopping on adjacent streets. The nearby bus-facilities for bendibuses (excluded by design) and others choosing not to divert via the tight bus-station, have to be considered as part of the interchange, so should get high quality upgrades. These facilities and foot-ways to them have to be assessed for DDA compliance (under the Equalities Act).</i></p> <p><i>Funding for high quality pedestrian routes to external bus stops, new shelters and information systems is owing from the valuable bus station site given to Rightacres, and can be secured by extra S.106 conditions. Likewise, funding for a future Metro station-halt in Wood Street (excluded from the Interchange design) should be secured via a S.106 condition to fulfil the integrated transport promise.</i></p> <p><i>The Central Square business and residential developments rely on extra use of Central Station rail services, yet the rail station is already overloaded. The integrated transport interchange requires additional passenger facilities for rail as well as bus and coach transport. The rail station/booking hall being constrained by the listed building status means that the new "interchange" needs to provide the bulk of the combined passenger facilities – waiting rooms, loos, café, travel information, hotel and car booking etc.</i></p> <p>Further detail</p> <p><i>1. Failure to provide requirements of the promised integrated interchange</i></p> <p><i>Passenger facilities are too small and limited to bus station users only.</i></p> <ul style="list-style-type: none"> <i>• needs to include loos, seating areas and refreshment facilities for bus passengers having to use stops in nearby streets</i> <i>• needs to provide information on bus services in nearby streets and how to reach them; that includes staff advisors and porters</i> <i>• needs to provide facilities for rail users, including an information board on rail services</i> <i>• needs to provide information on public coach services and how to reach their stops external to the bus station.</i> <i>• integrated tourist information and hotel booking should be guaranteed. While the retail units could provide a location, tourist information should be an integral part of the development – so allocated a site with paying the high rents.</i>

• *Late night waiting facilities should be guaranteed, serving rail as well as coach passengers, with overnight staffing*

2. *Pollution limits on Buses. We object to restricting the number of buses using Westgate St/Wood St to current numbers on the basis of their polluting emissions. The Central Sq development was permitted on the basis that*

a) *A new bus station could be sited on the Marland Ho. site to take all then buses plus expected increase (said to be 15%). Current numbers are lower than the base level, including all the coach services diverted elsewhere.*

b) *traffic from the development would not significantly impact on bus and traffic flows*

There are many diesel taxis, emitting excessive NO2, as well as buses. Much of the buses' emissions arises due to congestion caused by other vehicles, due to the waiting and stop/starting. Diesel cars including those fitted with unlawful 'cheat' devices are also significant emitters of NO2

• *traffic management to divert non-bus, non-essential traffic would relieve the buses from congestion, and keep down diesel-cars*

• *purchase and use of low-emission buses and low-emission taxis; the developer should contribute a significant sum towards the new vehicles*

• *requirement on the BBC to introduce low-emission operational lorries and to incentivise all staff vehicles to be low emission.*

3. *The Bus Station's 14 stands are too few to accommodate all bus services; the developer answered that the "Interchange" is to include stops in nearby streets (Lower St Marys, Custom House St, Wood St). The design excludes bendibuses - the Baybus and the 17/18 service – which would be forced to use these stops.*

Information and signing systems must therefore include those buses

• *requires signs etc at those stops as well as to them.*

• *Routes to-and-from with any crossings should be defined with recognisable paving. Disability compliance (Equalities Act) needs considering in these routes.*

The Access Group was consulted on the design of the Interchange building only, not the links to it and to the dispersed bus stops.

• *The Bus Stands at the dispersed stops need to be upgraded (funded by the developer) to permanent structures with adequate capacity and seating/information facilities comparable to those in the Interchange building.*

4. *Bus-route changes: it is unacceptable in procedural terms to force bus-route changes in areas outside the planning application site, without specific consultation on them. This applies in particular to preventing buses northward on Penarth Rd.*

4a. *Unacceptable to prevent buses from Cardiff Bay using the Penarth Rd route to the centre. The stop south of the railway bridge (Routes 2, 6) is essential for easy access to the rail station.*

4b. *Unacceptable to prevent buses from W and N-W Cardiff during event-day operation using Penarth Rd and then Canal St and Custom House St to turn back onto the Penarth Rd.*

4c. *Unacceptable to open Penarth Rd southbound to general traffic and clog-up the buses. Cars from the BBC car-park could block this route just like cars from the*

Marriott Hotel carpark choke the buses eastward along Custom House St.

5. The 215 car-parking places for the BBC should not be provided in the Interchange building. Like the Network Rail/Arrivatrains replacement parking, they could be provided south of the station (the Brains site is suggested; there are other sites within the 400m from the BBC building said to be acceptable walking distance).

- bad for Cardiff's image to provide car-parking in a "world class" transport interchange*
- petrol/diesel car movements generate pollution in a sensitive area (pollution levels outside the Great Western are predicted to worsen significantly), important for pedestrian s.*
- need to restrict the number and variety of vehicle movements on the key pedestrian route of Saunders Road and its junction with Penarth Road, as Network Rail argue*
- existing congestion on Saunders Rd is significant from taxis, service traffic and the NCP car park, so that buses from the interchange are likely to be caught in future congestion (no study is presented to show otherwise).*

6. We support Network Rail's criticism (6.7) that a true 'transport interchange' requires clarity on the interrelationship between this Interchange and their rail station. We agree with Network Rail that the development has to contribute funds for increasing station capacity, just as a developer has to contribute funds for adding necessary road capacity.

We support their request for financial contributions to cover the provision of Customer Information Systems within the station concourse area, for the provision of bus and coach journey information; also for additional passenger facilities at the rail station for the extra rail-users generated by the development's business and residential components.

7. DropOff/PickUp places are unacceptable on Penarth Rd (under the bridge)

- no pavement under the Bridge, east side, no crossing from places south of the bridge*
- long distance to bus-station, up-hill on restricted (crowded) pavement on west side*
- crossings of busy Saunders Rd bike and taxi lanes*

8. Key pedestrian route Saunders Rd. (1.31) cf. Network Rail's description in 6.7 as "popular and well-used pedestrian route linking Cardiff Central Station with the city centre".

We support Network Rail's concern that the development will fail to create a safe and attractive pedestrian environment along Saunders Road given the range of vehicular movements. They rightly say the quality of the public realm and the safety of pedestrians at these crossing points is critical. We support their proposal for the Section 106 agreement to require the creation of a high quality public realm environment on the northern side of Saunders Road, to ensure that pedestrian safety and ease of movement is prioritised over vehicular flows.

9. We object to the failure to plan for event-day use of the Saunders Road route by buses. Saying signals are not needed on non-event days because bus movements are few (1.31) is no excuse – signals have to be provided for event-days.

10. The Penarth Road footway is also key, linking the Bus Interchange to the business developments (Callaghan Sq and Dumballs Rd) including the new C&V College campus. People pull wheeled luggage up it from the T9 coach and buses from Cardiff Bay (the Bendibuses will not be accommodated in the Interchange building)

This footway is substandard in width and often crowded. Its crossing of Saunders

	<p><i>Road at its junction is poor. We propose a financial contribution (within the Section 106 agreement) to pay for the creation of a high quality footway on the western side of Penarth Road with crossing of Saunders Rd, to secure pedestrian safety and ease of movement when changing buses.</i></p> <p>11. <i>Security under major incidents</i></p> <p><i>We see no planning for bomb alerts and 'terrorist' attack; the interchange would be attractive and vulnerable. Emergency evacuation of bus-user crowds require good information, coordination and trained staff. We require a condition that the developers guarantee and fund this'.</i></p>
<p>REMARKS:</p>	<ol style="list-style-type: none"> 1. Future integration with the railway station and the provision of additional interchange facilities and a covered link does not form part of the planning application. The matter is addressed in paras 8.32, 8.36 & 8.37 of the officer's report. 2. The upgrading of bus stops/ facilities in the vicinity of the interchange, and the upgrading of routes connecting these stops to the interchange building, either through planning condition or 106 legal agreement, are not necessary to make the development acceptable in planning terms and do not therefore meet the relevant planning conditions/ planning obligations tests. 3. Improvement works to the railway station as a consequence of increased demand on the station facilities are not necessary to make the development acceptable in planning terms. See paras 8.38 & 8.39 of the officer's report. 4. The design and provision of passenger facilities for the bus station users, including provision of information, does not form part of the planning application. This will form part of the bus station fit-out and plan of operation and is the responsibility of the Council. 5. Air Pollution is addressed in paragraphs 8.21 to 8.26 of the officer's report. Potential restrictions on bus movements are required to ensure that pollution levels in the City Centre AQMA are not made significantly worse as a result of the operation of the interchange. 6. Measures to force bus operators, taxis, or the BBC to introduce low-emission vehicles cannot be conditioned or required by legal agreement as such measures are not necessary to make the development acceptable in planning terms. 7. Future bus routing and movements are not a planning matter. The proposed wider highway enabling works (see paras 1.36 to 1.42 of the officer's report) are required to achieve optimal access to the interchange, but are not necessary for the delivery and operation of the interchange. The responsibility for delivering the enabling works falls to the Council. 8. Parking provision for the BBC on the Marland House/ NCP site forms part of the development agreement for the delivery of the BBC HQ, and planning permission was granted on this basis. See para 1.25 of the officer's report.

	<p>9. Saunders Road pedestrian environment and public realm: See paras 1.31, 8.35 and 9.3 of the officer's report.</p> <p>10. Pick-up/ Drop-off: See paras 1.43, 1.44 & 8.16 of the officer's report.</p> <p>11. Security: See para 6.13 of the officer's report.</p>
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PAGE NO. 62	APPLICATION NO. 16/2731/MJR
ADDRESS:	LAND TO THE NORTH OF CARDIFF CENTRAL RAILWAY STATION AND SAUNDERS ROAD, SOUTH OF WOOD STREET AND WEST OF GREAT WESTERN LANE, CARDIFF
FROM:	Objection dated 28.2.17 from Mr. Swingler, Royal Hotel.
SUMMARY:	<p>Mr. Swingler objects as follows:</p> <p><i>'This representation is made by The Royal Hotel Cardiff against the above planning application for the Cardiff Transport Interchange. The proposed changes to the surrounding road network will directly impact upon the hotel's operation and ability to attract business and we therefore request that the application is modified prior to consent being granted or that a Grampian condition be attached to the decision ensuring an appropriate arrangement for unfettered access for guests.'</i></p> <p><i>The Royal Hotel is a Grade II listed Victorian building and has been in Cardiff city centre since 1866. This historic hotel is an important part of Cardiff's heritage and a key piece of the city's tourist and business infrastructure. We have previously submitted objections to this scheme and on 3rd February 2017 a meeting was held with the applicant and Council officers to discuss our concerns. However, these issues remain unresolved.</i></p> <p>Objection</p> <p><i>The Cardiff Interchange proposal would limit the hotel's ability to use the existing loading bay at Westgate Street, which will have a major and detrimental impact upon the hotel and its ability to attract guests.</i></p> <p><i>As part of the proposal, Westgate Street, between Park Street and Wood Street, will be converted from one-way southbound for all vehicles, to two-way, with restricted access for buses and taxis. These proposals would severely restrict access to the hotel for guests arriving by private car who currently rely on the use of the existing loading bay located to the immediate rear of the hotel, along Westgate Street and would result in hotel guests being unable to access the existing loading bay to the rear of the hotel, to pick-up / drop-off luggage / persons.</i></p> <p><i>As such this would inconvenience guests, forcing them to find an alternative, less accessible, pick-up / drop-off point, further afield from the Hotel. This has implications in terms of elderly and disabled persons being unable to access the hotel. Also, this would have a detrimental impact on the attractiveness of the hotel (given that it would have no dedicated vehicle access).</i></p> <p><i>Whilst the applicant states that the restriction to buses and taxis only would be restricted to certain times, with guests free to use the two-way route outside of the restricted hours, no details are provided of the likely times of operation of the route. Owing to the expected level and times of use of the Bus Interchange, it is likely that restrictions on the two-way route would be in force for the vast majority of the day. This would result in a limited time window for guests to access the loading bay. Furthermore, it is likely that the times of operation of the two-way route would conflict with the peak times in which guests arrive and depart the hotel (i.e. during the day).</i></p> <p><i>New loading bays will be provided westbound on Wood Street and southbound on</i></p>

	<p><i>Havelock Street; however, again no details have been provided of the timing for the provision of the bays, times of operation or levels of use of the bays. These loading bays are 100 metres and 150 metres respectively from the hotel.</i></p> <p><i>Given their prominent location (close to the Rail Station / proposed Bus Interchange) it is likely that the bays will be extremely well used by vehicles picking-up / dropping-off people associated with the mix of uses and activities within the immediate vicinity. This will inevitably result in it being difficult for hotel guests to gain access to the bays. It should also be noted that the bays require that hotel guests, particularly those who are elderly or disabled, carry their luggage to the hotel. This is considered to be a deterioration of the existing situation, which is not acceptable to the hotel</i></p> <p><i>Indeed we note that in Paragraph 8.81 of the Committee Report it is acknowledged that due to the nature of guest arrivals, it is unlikely that the same level of access to the hotel can be achieved.</i></p> <p><i>The pedestrianised section of St Mary's Street immediately outside the hotel can still be accessed for loading between midnight and 10 am; however, this does not correlate with the peak times of operation of The Royal Hotel (where guests are currently required to check-out at 11am, and check-in at 3pm).</i></p> <p>Proposed Amendment</p> <p><i>The proposed changes to the transport network in the area will therefore result in a significant deterioration of the current arrangement, restricting the ability for guests to arrive at the hotel with their luggage, whilst the new servicing bays are too far away from the hotel and are likely to have limited capacity due to the demand from other users in the area.</i></p> <p><i>In the absence of any confirmation of the proposed times of operation of bus / taxi lane, or the existing loading to the rear of The Royal Hotel in the future scenario, we request that normal vehicles (in addition to buses and taxis) are permitted to use the bus / taxi lane to access the existing loading bay between the hours of 10.00 and 19.00, seven days a week. We also request that the loading bay be made available for use between these times (and also all other times outside of the proposed times of operation of the bus / taxi lane). This would allow guests to be dropped off or collected from the hotel by car with their baggage.</i></p> <p><i>Alternatively a Grampian condition could be attached to the decision ensuring this arrangement.</i></p> <p><i>We also request that a pre-commencement condition be attached to the decision to confirm the timing and availability of the loading bays on Wood Street and Havelock Street.</i></p>
REMARKS:	These points are addressed in paras 8.81 to 8.84 of the Committee Report.

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ADDRESS:	LAND TO THE NORTH OF CARDIFF CENTRAL RAILWAY STATION AND SAUNDERS ROAD, SOUTH OF WOOD STREET AND WEST OF GREAT WESTERN LANE, CARDIFF
FROM:	Objection dated 22.2.17 from Mr. Burgess, Cardiff resident.
SUMMARY:	<p>Mr. Burgess objects on the following grounds:</p> <p><i>'I wish to register a strong objection to this proposal on the grounds that the Bus Station will be of inadequate size.</i></p> <p><i>Attached is a copy of a Paper which was submitted to the meeting of the Bus Station</i></p>

	<p><i>Scrutiny Committee held on 25th November 2015 by Cardiff Civic Society. It demonstrates two things:</i></p> <ol style="list-style-type: none"> <i>1. that the 14 bus bays will probably accommodate only around 168 buses per hour. And</i> <i>2. given that the adopted LDP states that it is necessary to achieve a 50:50 modal split between commuter travel by sustainable means of travel means rather than by private car use (sustainable travel is by use of rail, bus, cycling or walking), the result of this inevitably will be a huge increase in the numbers of buses travelling into Cardiff each rush hour.</i> <p><i>If only 168 of this large number of future buses can be accommodated by the new Bus Station, the result will be that the city centre will become nothing more than a huge bus park for those buses unable to access the new facility.</i></p> <p><i>The new Bus Station clearly needs to be many times larger than that which is currently proposed, which will rapidly prove to be far too small if it is built.</i></p> <p><i>The new Bus Station also needs to be of sufficient size to accommodate all Coach Services. It is wholly inappropriate that these should be left to operate from Sophia Gardens and without their inclusion at the Bus Station the latter cannot be described as an integrated transport hub. It is also highly inconvenient for any passenger arriving in Cardiff from the Valleys by rail who wishes to travel onward to some destination by coach to have to drag their luggage the distance of nearly two thirds of a mile between the Railway Station and the Coach Station in Sophia Gardens. As well as this there is the fact that the area in Sophia Gardens is not well lit after dark and coach passengers feel insecure there.</i></p> <p><i>The current proposal also omits to make any mention of how the future On-Street Tramway, which is included in Cardiff's Transport Strategy document, will be accommodated once this is built as a component of the Metro proposals.</i></p> <p><i>Cardiff is the Capital city of Wales and as such it deserves a comprehensive transportation hub. The present proposal does not equate to this and Cardiff's reputation elsewhere will be much reduced if the Bus Station is built as currently proposed.'</i></p>
<p>REMARKS:</p>	<ol style="list-style-type: none"> 1. In December 2014 Cardiff Council issued a Cabinet Decision supporting the proposed development site as the preferred location for the new Transport Interchange. Three of the key objectives that this site meets are the ability to interchange with rail services and other transport modes, land availability, and the ability to operate on event days. 2. The cabinet decision is supported by Development Plan Policy. Central Square is allocated as a strategic site within the Cardiff Local Development Plan ('LDP') (adopted January 2016). Policy KP2(A) specifically relates to the Central Enterprise Zone and Regional Transport Hub, of which Central Square forms part. Therefore the decision to build the new bus station on this site is fully policy compliant. The bus station has been designed to maximise the capacity of the site and will function as an efficient interchange. 3. The bus element of the interchange should be seen not solely as the interchange itself, but also as a network of satellite stops on Wood Street and Lower St Mary Street. The efficiency of the facility will be greatly enhanced by low dwell times for buses, as opposed to the previous bus station which was used as a layover facility. This will enable a higher throughput of services. The interchange is supported by ongoing work in Cardiff to improve bus journey times and journey time reliability to deliver improvements to the bus

	<p>network as a whole and allow the interchange to function efficiently and enhance the attractiveness of bus travel.</p> <ol style="list-style-type: none"> 4. The interchange will support the LDP target of achieving a 50% sustainable travel mode share by significantly enhancing the quality of bus provision in the city, including interchange between modes. It should be noted that bus operators have advised that there is existing spare passenger capacity on many of their services, so increase in bus passenger demand does not automatically equate to further increases in bus movement. 5. Furthermore based on evidence provided to the Inspector in the LDP hearings in support of the LDP target for 50% of travel by sustainable means the number of buses per hour using the interchange during the peak period is between 200 and 400 buses/hour in 2026. The bus station as proposed therefore has the capacity to cope with the likely future bus demand, given that not all services are likely to use the facility. 6. The interchange has been designed to accommodate coach services. The first five bays will have full length boarding fingers on both sides to facilitate dual side loading and access to luggage compartments. The proposed station layout has been designed and tested, physically and with Autotrack, for use by coaches and Transportation is satisfied that the proposals are acceptable in these terms. 7. Finally the metro project is being led by Welsh Government and a concept plan of the routes which could potentially form part of the Metro network has been published. The next phase of the Metro project will focus on modernising the core Valley Lines and the wider South Wales rail network. Development of other routes featured on the Metro concept plan will require extensive technical work to determine the feasibility and detail of different routes and their potential alignments. Therefore at this stage there are no detailed plans of specific routes and it is not possible to be certain about the timescales for delivery. 8. The interchange does not jeopardise potential future on-street tramway provision on Wood Street and/or Penarth Road. Indeed the provision of the interchange building complements future Metro proposals as it will consolidate interchange between modes.
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PAGE NO. 62	APPLICATION NO. 16/2731/MJR
ADDRESS:	LAND TO THE NORTH OF CARDIFF CENTRAL RAILWAY STATION AND SAUNDERS ROAD, SOUTH OF WOOD STREET AND WEST OF GREAT WESTERN LANE, CARIDFF
FROM:	Head of Planning.
SUMMARY:	The wording of condition 8 to be amended to read: <i>Hydraulic modelling assessment:</i> No development above ground floor slab level shall commence until a Hydraulic Modelling Assessment has been undertaken to assess the potable water supply to serve the

	<p>development. The solutions and overall potable water strategy shall be submitted to and agreed in writing by the Local Planning Authority. The approved scheme shall be implemented in accordance with the approved details. Reason: To protect the existing community and to ensure the site can be served with an adequate water supply.</p> <p>The wording of condition 14 to be amended to read: <i>Cycle parking:</i> Prior to beneficial occupation details showing the provision of cycle parking spaces shall be submitted to and approved in writing by the LPA. The approved scheme shall be implemented in accordance with the approved details. Reason: To ensure adequate provision is made for the secure parking of bicycles.</p> <p>The wording of condition 16 to be amended to read: Prior to the closure of the Network Rail car park a scheme for the provision of 42 car parking spaces on land belonging to the developer to the south of the station, to replace those lost as a result of the closure of the car park, shall be submitted to and approved in writing by the LPA. The scheme shall be implemented in accordance with the approved details. Reason: To ensure the provision of replacement parking provision.</p>
REMARKS:	To allow more time for the hydraulic modelling assessment to be carried out in the case of condition 8, and to clarify the wording of conditions 14 and 16.

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ADDRESS:	LAND TO THE NORTH OF CARDIFF CENTRAL RAILWAY STATION AND SAUNDERS ROAD, SOUTH OF WOOD STREET AND WEST OF GREAT WESTERN LANE, CARDIFF
FROM:	Nerys Lloyd-Pierce – Chair Cardiff Civic Society
SUMMARY:	<p>Cardiff's new bus station is a missed opportunity for a number of reasons.</p> <p>Firstly, it is too small to serve the capital city and the region's needs - a 'token' bus station instead of the regional transport hub that is needed. Being enclosed it also represents a potential health hazard as diesel fumes will be trapped.</p> <p>The essential link to the rail station has been moved to the council's 'wish list' and now may never happen.</p> <p>The retention of the Sophia Gardens facility for inter-city coaches is scandalous in a city that aspires to be a first class European Capital, and will create a poor image of the city to visitors for years to come.</p> <p>What's more, the 227 space private car park is directly contrary to the city council's transport and planning strategies to discourage the use of the private car in the city centre.</p> <p>The cycle parking facility is much needed, but appears very much as a</p>

	token gesture, and is scarce compensation for the scheme's manifest failings.
REMARKS:	Noted – See Committee Report

PAGE NO. 124	APPLICATION NO. 16/02939/MJR
	THE COAL EXCHANGE
FROM:	PLANNING OFFICER
SUMMARY:	Recommendation 1 erroneously refers to the “Planning Listed Buildings and Conservation Areas ‘Regulations’ “ and should refer to the “Planning Listed Buildings and Conservation Areas ‘Act’ ”
REMARKS:	Action- Revise

PAGE NO. 124	APPLICATION NO. 16/02939/MJR
	THE COAL EXCHANGE
FROM:	VICTORIAN SOCIETY
SUMMARY:	<p>Thank you for notifying the Victorian Society of this application. The scheme was considered by the Society’s Southern Buildings Committee at its recent meeting, and I write now to convey our response.</p> <p>The Coal Exchange is one of the most significant buildings in the whole country and, for the last three years and more, the Society has been alarmed by the apparent mismanagement of the building and its future. This latest application for phase 1 works to enable the building’s conversion to a hotel is not only totally inadequate in terms of the level of detail and information it provides, but further evidence of the unfortunate handling of the case. At this point we must strongly object to the application and urge that it is withdrawn.</p> <p>Dealing first (and necessarily briefly) with the application itself, the unsatisfactory absence of information fails to permit any appreciation of the significance of each area of the building or a clear understanding of the impact of the scheme on them. It is simply impossible to gauge the acceptability of the scheme: on what basis, and with what information, can anyone be expected to evaluate the proposals? Technically this application is unacceptably flawed and should not have been validated.</p> <p>The various listed building consent applications submitted last Summer (a majority of which, regrettably, we were not consulted on), unfortunately only exacerbate the present lack of clarity. Most, such as that affecting the windows, for example, did not propose specific interventions to historic fabric, but sought merely to establish an ‘in principle’ approach. This is essentially useless. It is all very well asserting a desire to repair ‘like for like’, or to retain important historic fabric ‘where possible’; but it is not sufficient to permit wholesale or intrusive works to the building, and it certainly doesn’t exclude the applicant from providing the comprehensive documentation that this latest application requires. The Coal Exchange may be a large building, but that by no means disqualifies the applicant, or indeed the Council,</p>

from its statutory obligations.

All historic fabric must be recorded and any interventions, particularly where any removal or demolition is proposed, are required to be clearly articulated and fully justified. In this respect the application wholly fails.

The trading hall almost certainly constitutes one of the building's most significant spaces, and any acceptable scheme should reinstate its spatial form and reveal the fine historic roof to view, as well as uncovering all of its handsome panelled walls and galleries. In addition, the removal of the 1970s car park must be made a major priority. Again, this application fails on both counts.

More generally, the continued lack of a Conservation Management Plan is a matter of profound concern. The CMP was acknowledged by the Council as long ago as July 2014 as being absolutely essential. Councillor Phil Bale, in his letter to the Victorian Society of 11 September 2014, described the CMP as a matter of "first priority".

Without this document it is impossible for the applicant to develop a genuinely informed, considered and sympathetic scheme of conversion.

The lack of a CMP was also addressed by the officer's report relating to last year's change of use application. It refers to the application's Design and Access Statement, which establishes the intention to produce a CMP in order, according to the planning officer, "to advise the submission of any future application(s) for Listed Building Consent". The Design and Access Statement prepared by Purcell for the change of use application refers numerous times to the pressing need for a CMP. It states that "the foundation of any design proposals will be based on information derived from the research obtained via the Conservation Management Plan and Gazetteer". It goes on to affirm that "prior to the repairs being carried out, regardless of the chosen development options, a more detailed understanding of the building must be obtained through detailed research as assessment of the built fabric. This should form the foundation of a Conservation Management Plan which clearly sets out the phases of development of the fabric, the key areas of significance, features and characteristics of interest and a clear articulation of the heritage values embodied within the site".

Section 6.5 of the D&A outlines further how the CMP would be developed and employed in evolving an appropriate scheme. The D&A Statement was a formal submission and offered assurance that the scheme was developing in an acceptable fashion. Those assurances have, thus far, proved empty. Clearly a CMP is required, and Cardiff City Council must ensure one is produced.

When the Victorian Society requested a site visit in 2014 we were denied access on the pretence that the Coal Exchange was on the verge of total collapse. Such specious claims have since been demonstrated to be wholly without objective basis.

Following the submission of this latest application we were informed that a site visit would now be possible: we continue to await news of when

	<p>this might be arranged.</p> <p>We recommend that this application is withdrawn. Apart from the fact that it is almost incomprehensible, any scheme – as the applicant itself, as well as the Council, has asserted – needs to be developed out of a full understanding of the building and its specific areas of significance. Such understanding can only be derived from a comprehensive Conservation Management Plan. One must be commissioned. In addition, a Heritage Statement should accompany any application, outlining the alterations proposed, their impact on the building’s significance and justification for their implementation. A masterplan is also required, outlining future phases and their rationale.</p> <p>After more than three years of campaigning for and encouraging the judicious and necessary steps to secure the future of the Coal Exchange, it is deeply frustrating to be now presented with this application. Technically it falls far short of what is statutorily required and there can be no basis for the Council granting it consent. It should be withdrawn and the reports, which were acknowledged in 2014 by all parties as being absolutely essential, should be commissioned.</p> <p>Yours sincerely</p> <p>James Hughes</p>
REMARKS:	Noted

PAGE NO. 124	APPLICATION NO. 16/02939/MJR
ADDRESS:	COAL EXCHANGE
FROM:	Planning Officer – Response to Victorian Society Objection
SUMMARY:	<p>The Planning Officer acknowledges the objection to the application and that the VS are unhappy with the way that the conversion of the predominantly derelict building into a viable hotel operation is progressing.</p> <p>The Grade II* Listed status of the Coal Exchange is fully accepted as being appropriate in terms of designating it one of most historically important commercial buildings in Wales, and as such any modification of the fabric of the building falls to be controlled by the Local Planning Authority, subject to reference to Cadw.</p> <p>The Listing description does not however reflect either the condition of the building or the scale of the project, nor in fact the quite disparate nature of the building interiors as in addition to a description of the external envelope of the building, it concentrates only on the main trading hall in terms of its account of the building interior.</p> <p>To clarify, the methodology of approach adopted the Planning Officer has been to require the developer to reference every room and space within the building, to record it, and to sign off on the details of</p>

conversion at every stage. This approach has been accepted previously at other large scale Listed buildings and also by Cadw in respect of this building.

In terms of the clarity of information submitted, the drawings quite clearly show intentions in respect of proposed demolitions, infilling and provision of new openings and also intentions regarding key rooms and spaces; as well as providing a written narrative.

In respect of the listed building consent applications submitted last year, (the majority of which did not include for any demolition works and therefore did not require reference to the Amenity Bodies) far from exacerbating any lack of clarity, purposefully established a rational and reasonable approach with which to control specific future change.

The VS aspirations to reveal the atrium roof of the trading hall is noted, and it is hoped that the owner of the building will propose such works soon; they have certainly been the subject of discussion with Officers.

The Planning Officer would remind the VS however that the current owner has only been in possession of the building for around 9 Months, and is still exploring some of the harder to reach areas of the structure and developing their proposals for the building.

Ultimately neither The Victorian Society nor the Local Planning Authority can dictate what is, or isn't proposed for the building, or the programming of such works. The Local Planning Authority's role is to consider the merit of proposals put before it, and to have special regard to the desirability of preserving the building.

The Planning Officer does not concur with the view of the VS that the development of the Coal Exchange is being mis-managed, and would argue that the building is currently in far better condition now than when the current owners acquired it, and that it has the best potential of being saved than it has ever had in recent decades.

In respect of the absence of a Conservation Management Plan, which is not a statutory component of a Listed Building Consent application; Committee are advised that Officers have been in discussion with the owners about the content and production of such a plan and its usefulness as a tool to advise on future change. However, in this instance the owner cannot be criticised for wishing to press ahead with the repair of the building fabric ahead of the production of such a plan, given the condition of the building, and the likelihood that the plan, will likely concentrate on maintaining the integrity of the building, on the preservation and maintenance of the former trading hall, ante rooms and external envelope of the building, which are either repair works, or the works for which Listed Building Consent is sought .

The request of the VS to visit the site is being considered by the building owner. This is not a matter for the Local Planning Authority.

The Planning Officer remains of the opinion that sufficient information has been submitted to recommend approval of the application on the

	basis of conditions/protocols proposed.
REMARKS:	