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Land at Dumballs Road, Cardiff
Planning Statement

Rightacres Property Company Limited

December 2016

31438/JCO/LC

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Contents

1.0	Introduction	1
	Report Structure.....	1
2.0	Application Site and Surroundings	3
	Site Description.....	3
	Accessibility	5
	Flooding.....	8
	Ecology.....	8
	Historic Environment.....	9
3.0	Planning History	10
4.0	Proposed Development	11
5.0	Planning Policy Context	13
	Cardiff Local Development Plan (2016).....	13
	National Planning Policy	14
	Supplementary Planning Guidance	14
	Key Policy Considerations	15
6.0	Development Appraisal	16
	Key Planning Considerations	16
	Development Density	18
	Design	18
	Sustainability.....	19
	Other Policy Considerations.....	21
	Have flood risk issues been considered?	22
	Drainage	24
	Summary	24
7.0	Planning Obligations	26
	Section 106 including Affordable Housing	26
	Community Infrastructure Levy	26
8.0	Conclusion	27

1.0 Introduction

1.1 This Planning Statement has been prepared by Nathaniel Lichfield & Partners (NLP) on behalf of Rightacres Property Company Limited. It accompanies an application for development at Land at Dumballs Road, Cardiff and seeks full planning permission for the following:

“Proposed mixed use development comprising 109 NO. 1 and 2 apartments (Use Class C3), ground floor flexible commercial unit (A1/A2/A3/B1/D1 Use), with access, car parking, cycle storage and refuse storage and associated works”.

1.2 The site forms part of the Central Cardiff Enterprise Zone and also forms part of Strategic Allocation Site A as identified within Cardiff Council’s adopted Local Development Plan (2016).

1.3 By way of context, a hybrid planning permission (LPA Ref: 14/00430/DC) for a major mixed use development was granted permission on 15 August 2014 for a site directly opposite the current application site (to the west of Dumballs Road). That permission relates to a site of approximately 13.4 hectares and is being taken forward by Dumballs Road Regeneration LLP. The approved development comprises full planning permission for the erection of up to 695 no. dwellings and 357 sq.m of A1/A2/A3/D1 floorspace and associated works, with further outline permission for another 1,460 residential units range office floorspace, hotel, education (primary school) and retail and leisure uses.

1.4 Further recent development activity has taken place in the near vicinity of the site, and will be discussed in more detail later in this report.

1.5 An EIA screening request will be submitted under separate cover; NLP considers that the application does not require an Environmental Statement (ES) as set out in the screening request.

Report Structure

1.6 This document assesses the planning considerations associated with the application proposal and considers the development in the context of national, and local planning policy and guidance.

1.7 This Statement should be read in conjunction with the other documents that have been submitted with the planning application.

1.8 This document is structured as follows:

- 1 Application Site and Surroundings;
- 2 Proposed Development;
- 3 Planning History;
- 4 Planning Policy Context;

- 5 Planning Policy Analysis;
- 6 S106 Heads of Terms and CIL;
- 7 Conclusion.

2.0 Application Site and Surroundings

Site Description

2.1 The application site extends to approximately 0.23 hectares and encompasses a relatively flat, vacant site that is accessed off of Dumballs Road.

2.2 The site's frontage onto Dumballs Road measures approximately 35m in length. The site is roughly rectangular in shape and measures approximately 88m in length by 30m in width for the most part.

2.3 The site's boundaries are described as follows:

- **Northern Boundary:** The site is bounded to the north by large format industrial buildings that form an automotive training centre for the Cardiff and Vale College (CAVC). Beyond the automotive training centre is the recently developed CAVC city centre campus.
- **Eastern Boundary:** Beyond the eastern boundary of the site lies Canal Park, an area of public open space that is well used by the local community. Canal Park has a range of facilities including a football pitch, open recreation space, playground and multi-use games area.
- **Western Boundary:** The western boundary of the site fronts directly onto Dumballs Road. Beyond the public highway, to the west, are a number of industrial units and car park area.
- **Southern Boundary:** The site is bounded by Anchor Industrial Estate, which contains two parallel flat roof buildings that host a variety of uses, including small scale office accommodation and a gymnasium.

Location and Surroundings

2.4 The immediate area is predominantly commercial/ industrial with the recently completed Fusion Point office development to the north of Canal Parade and industrial premises to the other side of Dumballs Road and to the south.

2.5 The application site can be characterised as the central section of a historic, and predominantly derelict, industrial area that has been in a state of decline. Given the location of the application site relative to Cardiff City Centre the area offers significant potential for urban regeneration to accommodate a sustainable mixed use development. The potential is already beginning to be realised with recent investment and development activity taking place near the site.

2.6 The area surrounding Dumballs Road, including the application site, has long been identified in numerous studies and policy documents as being in need of comprehensive regeneration including previous Development Plans and draft Plans, the City Centre Strategy and area appraisals, Dumballs Road Area Planning Brief (2006) and the Core Area (south) Masterplan (2013).

2.7 The need for regeneration has been recognised by both Cardiff Council and the Assembly Government and has culminated in the area being designated as an Enterprise Zone. The application site also falls within the Cardiff Central Enterprise Zone and Transport Hub (Strategic Site A) of Cardiff Council’s adopted Local Development Plan (2016).

2.8 The area is therefore acknowledged as a highly sustainable location for accommodating growth and a key focus for urban regeneration in the city.

Local Services and Facilities

2.9 The site is located approximately 500m to the south of Cardiff City Centre. The city centre has a diverse range of facilities and services available and is a major centre of employment. In addition, the city centre is also the head of the retail hierarchy for Cardiff and the wider South East Wales region, thereby offering a broad variety of shopping facilities.

2.10 Similarly, a wide range of services, facilities and existing employment facilities are also located nearby in Cardiff Bay.

2.11 We illustrate below a list of key services/facilities and their proximity to the site:

Table 2.1 Location of Key Facilities and Services

Facility/Service	Name	Approximate distance from site (metres)
Bus Stop	Dumballs Road Middle	25m
Train Station	Cardiff Central	450m
Primary School	St. Mary the Virgin	400m
Secondary School	Fitzalan High School	2,700m
Supermarket	Asda Cardiff Bay	1,700m
Library	Cardiff Central	870m
Leisure Centre	Channel View Leisure Centre	970m
Clinic/Health Centre	Butetown Health Centre	300m

Source: NLP

2.12 In addition, to the above, further facilities and services are expected to come forward as part of wider development associated with the designation of the Dumballs Road area as an Enterprise Zone and Strategic Development Site. For example, permission has already been granted for a range of retail/leisure uses, offices and assembly/leisure floorspace including a primary school associated with the comprehensive development of a site to the west of Dumballs Road (LPA ref: 14/00430/DCI).

2.13 The additional services and facilities emerging in the area will ensure that the already well serviced and highly sustainable site will become even more vibrant and sustainable in the future.

Accessibility

- 2.14 The site is in an excellent location and accessible by a choice of travel modes including local and regional bus services, local, regional and national rail services, a plethora of walking and cycling routes including the Taff Trail.

Walking

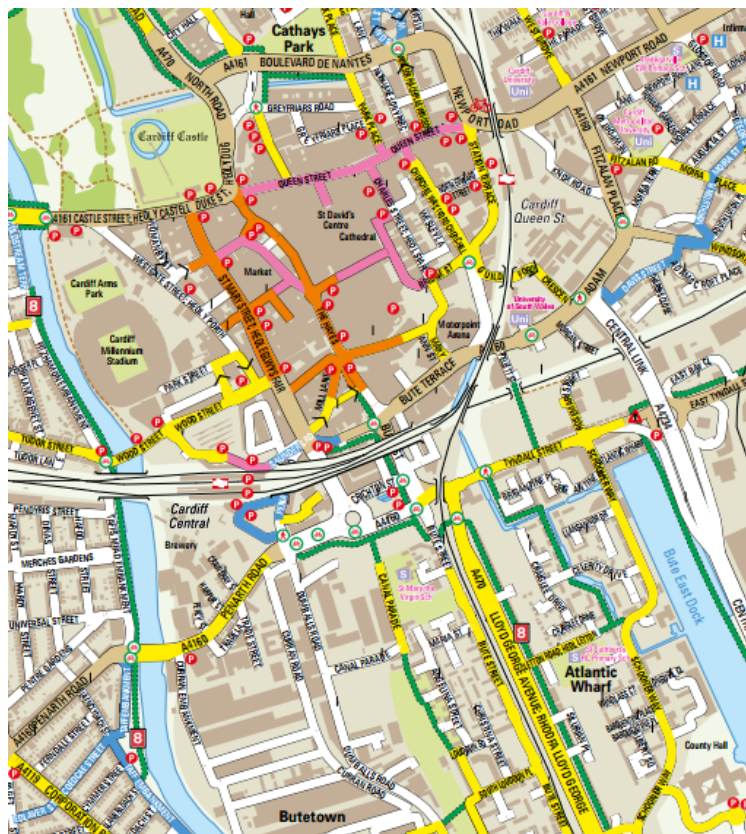
- 2.15 The roads within the catchment area of the proposed development are generally a mixture of local access and urban distributors with generally good quality footways, street lighting and dropped kerbs at crossing points near to junctions.
- 2.16 With well-lit and kerbed footpaths available along either side of this single carriageway, Dumballs Road forms one of the primary pedestrian links to the site with onwards connections into the Cardiff City Centre to the north and south towards Cardiff Bay. Following the road alignment northwards, the footpath is typically two metres wide with good modern surfacing, street lighting and dropped kerbs at crossing points near to junctions.
- 2.17 Toucan crossings are installed along all arms of Dumballs Road/ Penarth Road junction joining the pedestrian routes along the A4160 and to the north of the junction facilitating access to the Cardiff Central Station and destinations in Cardiff City Centre.
- 2.18 A traffic free cycle/pedestrian link to the east of the application site alongside Canal Park can also be accessed via a number of nearby connection points and provides a walking route to the residential areas off Bute Street.

Cycling

- 2.19 The development has good connections to the established local cycle routes close to the site that offers a range of cycling opportunities with connection to local communities and further afield into Cardiff City Centre.
- 2.20 The primary cycle route serving the site will be via an advisory cycle route along Canal Parade. This cycle route provides onwards connection into the cycle network that penetrates Bute Town and Cardiff Bay to the south.
- 2.21 To the north the advisory cycle route joins the wider Cardiff cycle network along the A4160 Penarth Road. Following the road alignment of this local distributor:
- Through the Toucan Crossing at the A4160/Dumballs Road Junction, the cycle route joins a sign posted on-road cycle lane alongside the rear of Cardiff Central Train Station, which subsequently extends onto Woods Street and St Mary Street where the route radiates out through the City Centre providing access to local attractions and popular destinations.

- Heading westwards, the traffic free cycle route then proceeds as on-road cycle lanes crossing over the river Taff and joins the National Cycle Network (NCN) route 8 running along the Taff Embankment facilitating a long distance connection between Coryton in the north and Grangetown to the south.
- Heading eastwards, the cycle route extends onto Bute Street, Lloyd George Avenue, and Tyndall Street with the latter one connecting to the local cycle network east of the Cardiff area.

Figure 2.1 – City Centre Walking/Cycling Routes



Source: Cardiff Council

Rail

- 2.22 The application site is located some 450 metres south of Cardiff Central Station, which can be accessed via an approximate 5 -10 minute walk via Dumballs Road.
- 2.23 The station is a major transport node in South Wales and offers a high level of connectivity to local and regional railway services. It is served by mainline train services run by Arriva Train Wales, Cross-Country and First Great Western to regional and sub-regional centres.
- 2.24 Arriva Trains Wales operate services to West Wales, Holyhead, Crewe and Manchester, as well as the South Wales Valley Lines. First Great Western runs

intercity services to Bristol and London, and regional services to Bath, Taunton, Southampton and Portsmouth, whilst Cross-Country operates trains to Gloucester, Birmingham, Nottingham and Manchester.

- 2.25 In addition, the station also provides access to frequent railway services that serve local train stations allowing short distance travel on trains from within the suburban area of Cardiff.
- 2.26 The development site is also well located to Cardiff Bay Railway Station (approx. 600m to the south), albeit this station only provides train connections to Cardiff Queen Street Station.

Buses

- 2.27 The site benefits from good bus links, with the nearest bus stops located approximately 25m to the south of the site. Bus services 1 and 2 operate from these stops and provide a frequent circular service across Cardiff.
- 2.28 The redevelopment of the former Cardiff Bus station at Central Square is currently on-going and a planning application for the development of a Transport Interchange at that site will be under consideration by Cardiff Council by the time a planning application is submitted for this proposed scheme at Dumballs Road.
- 2.29 Once development is complete (expected 2020), the Transport Interchange would only be approximately a 10 minute walk from the application site, providing a frequent and comprehensive network of bus services which links this application site to a wide range of destinations in Cardiff and the wider region.

Travel by Car

- 2.30 Dumballs Road is a primary distributor road that has been designed to accommodate traffic associated with the former industrial uses in the area, the width of the highway is therefore frequently in excess of 8.0 metres.
- 2.31 Dumballs Road has a mixture of commercial, retail and residential frontage along its length with intermittent on-road parking. The road is a primary link from Cardiff City Centre to Cardiff Bay and runs through the heart of the identified Cardiff Enterprise Zone in a north-south direction.
- 2.32 The road is serviced by sufficient street lighting of a modern standard, and it has a speed limit of 30mph, reflecting its urban character. Paved footpaths of a variable width are available along either side of the carriageway with dropped kerbed at junctions to facilitate the crossing movements.
- 2.33 Approximately 350 metres north of the application site, Dumballs Road joins the A4160 at a signalised cross road junction. Continuing northwards, the single carriageway proceeds as Penarth Road and enters a bus/taxi only route after passing the Cardiff Central Station.

- 2.34 The A4160 operates as an urban principal road that runs across Cardiff City in an east/west direction. To the east it continues as the A470 facilitating connections to A4234, whereas to the west it travels through the Grangetown area providing onwards connection to A4234 and Penarth Area. To the south of the development site, Dumballs Road meets the A4119 Clarence Road at a crossroad junction as a minor arm.

Summary of Accessibility

- 2.35 The site is ideally located with good connections to the existing pedestrian and cycle networks, allowing large areas of the city centre and Cardiff Bay to be accessible on foot, and most areas of the city to be accessible by bicycle. These links also provide access to the central rail stations and the emerging transport interchange allowing extensive public transport connections to areas further afield.
- 2.36 Similarly, the site is well connected to the existing local highway network, providing good links to the major radial routes and distributor roads in all directions.

Flooding

- 2.37 According to TAN15 Development Advice Maps the site falls within Flood Zone C1 (areas of the floodplain which are developed and served by significant infrastructure, including flood defences).
- 2.38 Although the site lies within the tidal floodplain of the Severn Estuary, the construction of the Cardiff Bay Barrage provides a significant level of flood protection for the low lying areas of Butetown and Grangetown, including the application site.
- 2.39 In line with the advice contained within TAN 15, a Flood Consequence Assessment has been prepared, by Marsden Associates, to accompany this application.

Ecology

- 2.40 There are no known ecological features on the site. The site is in a completely cleared state and comprises hard hardstanding, with its previous use having been demolished in 2015 in anticipation of development.
- 2.41 The nearest statutory designated sites of nature conservation interest to the application site is over 2km away to the south east of the application site (Severn Estuary SSSI).
- 2.42 Cardiff Council's website has revealed the presence of one non-statutory Site of Importance for Nature Conservation (SINC). This is the River Taff SINC which at its nearest is located approximately 450m to the west of the application site. This SINC is separated from the site by a major road and existing built development, while planning permission is also in place for a

major mixed use development scheme that would be sited adjacent to the SINC and physically separate the SINC from the current application site.

Historic Environment

- 2.43 There are no Listed Buildings within the site or immediately adjoining the site. Likewise, there are no Scheduled Ancient Monuments in the near vicinity.
- 2.44 The site is also not located in or adjacent to a conservation area, nor has been identified by the Council as being in an archaeologically sensitive area and there are also no locally listed buildings of merit in close proximity.
- 2.45 The nearest Listed Buildings and their proximity to the application site are detailed in the below table:

Table 2.2 Nearest Listed Buildings to the Application Site

Name	Grade	Cadw Reference	Approx Distance from Site
Parish Church of St Mary the Virgin and St Stephen the Martyr	II	13981	430m
Greek Orthodox Church of St Nicholas	II	13986	450m
Railway Overbridge	II	13962	550m
Statue of Second Marquess of Bute	II	13799	580m
Cardiff Bay Train Station	II*	13963	590m

Source: Cadw

3.0 Planning History

3.1 According to the Council's on-line planning register, the site has a limited planning history, comprising application ref: 14/01912/DCI for the demolition of a vacant single and two storey industrial/storage unit, which was granted permission in October 2015 (the works have subsequently been completed with the site now cleared).

3.2 However, there are numerous other planning permissions in the near vicinity that have resulted in various redevelopment of the area surrounding Dumballs Road or demonstrate intention for future redevelopment, including the following:

- There is an extensive planning history relating to the development of Fusion Point office complex, located nearby at Tresillian Terrace/Canal Parade. The first two phases of development have already been complete, with the third phase currently under construction (LPA Ref: 16/00857/MJR).
- 13/00648/DCI – Construction of a new city centre community campus for Cardiff and Vale College approved July 2013 and subsequently completed.
- 14/00430/DCI – A hybrid planning permission, approved August 2014, for redevelopment of a 13.4 hectare site to the west of Dumballs Road. Full planning permission in place for erection of up to 695 no. dwellings and 357 sq.m of A1/A2/A3/D1 floorspace, associated car parking and secure cycle storage, access, servicing and landscaping. Outline consent in respect of a further 1,460 residential units as well as A1 retail, A2 financial and professional services, A3 food and drink, B1 office, C1 Hotel, C3 residential, D1 non-residential institution, D2 assembly and leisure uses, access, parking, servicing and landscaping.
- 15/00551/MJR - Refurbishment of existing (B1,B2 &B8) industrial units into college workshops & associated classrooms (ancillary education/training use) plus hard & soft landscaping. The application was approved in June 2015 and subsequently completed.

3.3 The above developments provide important context as part of the changing face to the Dumballs Road area and illustrate the physical and social regeneration that is taking place in this location.

4.0 Proposed Development

4.1 The enclosed application seeks full planning permission for a high-rise residential tower (up to 22 storeys in height) with a groundfloor commercial unit, associated access and parking.

4.2 The proposed description of development is as follows:

“Proposed mixed use development comprising 109 NO. 1 and 2 apartments (Use Class C3), ground floor flexible commercial unit (A1/A2/A3/B1/D1 Use), with access, car parking, cycle storage and refuse storage and associated works”.

Land Use

4.3 The proposal is for 109 residential units in the private rented sector, with a small quantum of commercial floorspace at ground floor level (94 sqm).

4.4 The residential units will be a mix of 1 and 2 bedroom apartments, consisting of 34 x 1 bedroom (31%) and 75 x 2 bedroom (69%). The floorspace of the units would measure between 41sqm and 74 sqm.

4.5 The development includes roof top terraces at the 19th storey (south-facing terrace) and at the 21st storey (north-facing terrace). A plant/boiler room would also be housed on the 18th storey.

4.6 A total of 94sqm flexible commercial floorspace (Use Class A1/A2/A3/B1/D1) is proposed at groundfloor level. This consists of one commercial unit that would be directly accessible from Dumballs Road, although provision is made for a dividing wall in order that two units could be formed depending on the operator demand for this space.

4.7 35 vehicle car parking spaces are provided at groundfloor level, including two disabled spaces – access to these spaces would be restricted to residents of the scheme. In addition, a secure cycle store would provide 95 cycle parking spaces, while further covered cycle stands would provide an addition 20 cycle spaces including 6 visitor spaces (115 cycle spaces in total).

4.8 Provision for refuse storage areas has been made on site at ground floor level for recycling, compost and waste, including a bulky refuse area (see proposed groundfloor plan G1358-P03). The refuse storage area has kerbside access available to facilitate collection.

Scale & Density

4.9 The building is predominantly 20 storeys in height, with a modelled top that varies in height from 18 to 22 storeys. The maximum height of the building is 71m OAD.

4.10 The proposed development achieves a density of 474 dwellings per hectare.

Access and movement

- 4.11 A singular vehicular access will be provided directly off Dumballs Road, in a very similar position to the existing access into the site. Vehicle movement into the site is proposed to be restricted to residents of the scheme through the use of automatic gates.
- 4.12 Emergency services can reach the site via Dumballs Road with immediate access to the building edges.
- 4.13 Pedestrian access is off the adopted footpath network which fronts the site. No public rights of way are affected by the proposed development.
- 4.14 Further information in relation to access can be found in the accompanying Design and Access Statement and accompanying planning drawings.

5.0 **Planning Policy Context**

5.1 In accordance with S.38 (6) of the Planning and Compulsory Purchase Act 2004, the determination (of a planning application) must be made in accordance with the plan unless material considerations indicate otherwise.

5.2 The statutory development plan for Cardiff Council comprises the recently adopted Local Development Plan.

Cardiff Local Development Plan (2016)

5.3 The Cardiff LDP was adopted on 28 January 2016 and now forms the basis for decisions on land use planning in Cardiff. NLP considers that the following LDP policies are relevant to the determination of this application:

- a. Policy KP2: Strategic Sites
- b. Policy KP2(A) Cardiff Central Enterprise Zone & Regional Transport Hub;
- c. Policy KP4: Masterplanning Approach
- d. Policy KP5: Good Quality and Sustainable Design;
- e. Policy KP7: Planning Obligations;
- f. Policy KP10: Central & Bay Business Area;
- g. Policy KP15: Climate Change;
- h. Policy KP17: Built Heritage;
- i. Policy H3: Affordable Housing;
- j. Policy EN9: Conservation of the Historic Environment;
- k. Policy EN12: Renewable and Low Carbon Technologies;
- l. Policy EN13: Air, Noise, Light Pollution and Land Contamination;
- m. Policy EN14: Flood Risk;
- n. Policy T1: Walking and Cycling;
- o. Policy T5: Managing Transport Impacts;
- p. Policy T6: Impact on Transport Network and Services;
- q. Policy R1: Retail Hierarchy;
- r. Policy R6: Retail Development (Out of Centre);
- s. Policy R7: Retail Provision within Strategic Sites;
- t. Policy R8: Food and Drink Uses;

- u. Policy C5: Provision for Open Space, Outdoor Recreation, Children's Play Space and Sport
- v. Policy W2: Provision for Waste Management Facilities in Development;

National Planning Policy

5.4 Planning Policy for Wales (PPW) provides the Welsh Government's national policy guidance and is therefore also a material consideration. The following chapters are considered relevant to the determination of this application:

- Chapter 4 – Planning for Sustainability
- Chapter 8 – Transport
- Chapter 9 – Housing
- Chapter 10 – Planning for Retail and Town Centres

5.5 The following Technical Advice Notes are also relevant to the determination of this application:

- TAN2 – Planning and Affordable Housing (2006)
- TAN4 – Retailing and Town Centres (1996)
- TAN8 – Renewable Energy (2005)
- TAN12 – Design (2016)
- TAN15 – Development and Flood Risk
- TAN18 – Transport (2007)
- TAN21 – Waste (2014)

Supplementary Planning Guidance

5.6 The following adopted Supplementary Planning Guidance is also deemed to be specifically relevant to the proposed development:

- Dumball Road Area Planning Brief (2006)
- Tall Buildings Design Guide (2009)

5.7 Other relevant adopted supplementary planning guidance documents are:

- Access, Circulation and Parking Standards (2010);
- Community Facilities and Residential Development (2007)
- Developer Contributions for School Facilities (2007)
- Developer Contributions for Transport (2010)
- Public Art (2006)

- Public Rights of Way and Development (2006)
- Residential Design Guidance (2008)
- Waste Collection & Storage Facilities (2007)

Key Policy Considerations

- 5.8 Taking into account the relevant national and local policy considerations, the key issues in the determination of this planning application can be summarised as:
- Is the principle of development of this site for residential purposes acceptable?
 - Is the scale and density of development considered appropriate?
 - Is the proposal of an appropriate design quality?
 - Is the proposal considered sustainable development?
- 5.9 An assessment of the proposed development against these key considerations, as well as wider planning issues is included at the following section.

6.0

Development Appraisal

Key Planning Considerations

Land Use

6.1

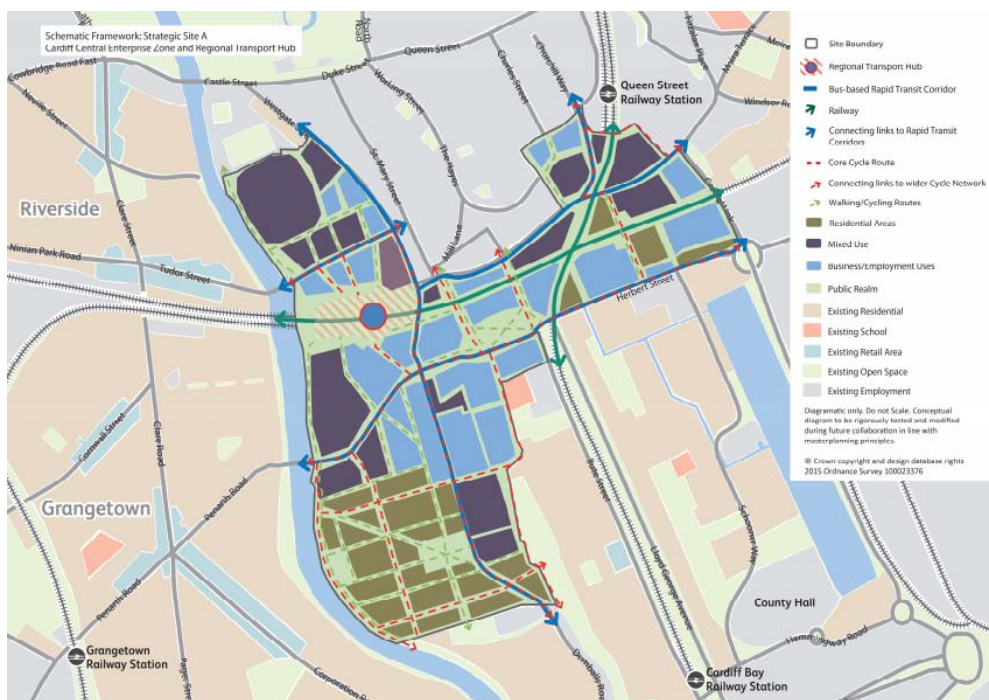
Policy KP2(A) of the adopted LDP explains that:

“Land is allocated at Cardiff Central Enterprise Zone, as defined on the Proposals Map, for a major employment-led initiative including a Regional Transport Hub together with other mixed uses in Cardiff City Centre in order to fulfil Cardiff’s role as economic driver of the city-region, providing major employment opportunities focused on financial and business services and maximise the advantages of its central location.”

6.2

The application site forms part of this allocation and therefore the principle of development of this site is well established and is supported by Cardiff Council. A schematic Framework has been prepared for this allocation and can be seen below:

Figure 6.1 Schematic Framework Strategic Site A – Cardiff Enterprise Zone



Source: Cardiff Council LDP 2016

6.3

In addition, PPW (para 4.9.1) promotes the reuse of previously developed land and states that wherever possible, brownfield sites should be used in preference to greenfield sites. Para 4.9.2 continues to state that many previously developed sites in built up areas may be considered suitable for development because their re-use will promote sustainability objectives. PPW

states that sites in and around existing settlements where there is vacant or under-used land, commercial property or housing will be appropriate.

- 6.4 The principle of development on this site is one that is well established as the site is located within the settlement boundary of Cardiff and has been previously developed. The redevelopment of this site would accord with PPW's preference for the reuse of previously developed land, especially sites that would promote sustainability objectives. The location of the site presents excellent opportunities to promote sustainable objectives.
- 6.5 Furthermore, the application site falls within an area identified for residential development in the schematic framework established as part of Policy KP2(A). Albeit we acknowledge that this is only representative of how development may come-forward in this strategic site and not a rigid framework that must be followed. This is indicated at Paragraph 4.43 of the LDP, through recognition that *"different potential projects in the area are operating to different timescales so an over-prescriptive approach would not be appropriate"*.
- 6.6 Consequently, the re-development of this site for a residential development is entirely in accordance with Policy KP2(A) of the LDP and national policy guidance.

Commercial/Retail Provision:

- 6.7 A detailed retail impact assessment has not be undertaken as the quantum of retail floorspace being sought at the site is significantly below the 2,500 sqm threshold identified in TAN4 as requiring a retail impact assessment to be undertaken.
- 6.8 The commercial floorspace provision within the scheme is relatively modest (94 sqm) and is intended to complement the primary residential use of the site. Given an end operator has not yet been identified, a flexible use (Use Class A1/A2/A3/B1/D1) is currently sought.
- 6.9 Assuming the commercial floorspace is taken forward as retail floorspace the intention would be for the space to be occupied by local convenience/financial and professional services or food retail in the form of a café/restaurant that provide a complementary service to the main development.
- 6.10 The level of retail floorspace proposed within the overall development mix on the site comprises a relatively small proportion of the total development floorspace. This is deliberate to ensure that the retail floorspace acts primarily as an ancillary use to the principal residential use of the site. It will also help to enrich the overall proposal for the site by providing both a complementary use and an active frontage at groundfloor level.
- 6.11 The complementary nature of the retail floorspace, is primarily intended to serve a growing residential population and nearby businesses and is not intended to function as a retail destination in its own right.

- 6.12 The application site is out-of-centre for retail purposes, however, given the above we do not consider the proposals will cause any harm to the vitality or viability of the Central Shopping Area and consider the proposal to be in line with the requirements of LDP Policy R7 (Retail Provision within Strategic Sites).

Development Density

- 6.13 The compact nature of the site lends itself to a high density development. A development density of 474 dwellings per hectare has been achieved which is deemed appropriate within this highly urban environment and in the context of existing, emerging and proposed development.
- 6.14 Policy KP2(A) endorses high development densities in the strategic site, stating *“Densities will be maximised to make efficient use of city centre land in a highly accessible location. High rise, high density developments at appropriate locations within the site are encouraged and residential densities in excess of 100 dwellings per hectare are not considered unreasonable in principle”*.
- 6.15 The density and height of the building accord with Policy KP2(A)’s aspiration for the strategic site to be developed to a high density that contributes to the regeneration of the area and makes efficient use of brownfield land. We therefore consider the development density is appropriate.

Design

- 6.16 Policy KP5 of the LDP states that all new development will be required to be of a high quality, sustainable design that makes a positive contribution to the creation of distinctive communities, places and spaces. This involves inter alia responding to the local character and context of the built and landscape setting so that layout, scale, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage are all addressed within development proposals.
- 6.17 The design of the building has been informed by extensive assessment of the site and its context and has been subject to detailed discussions between the architect and the LPA, with particular attention to the guidance in the Council’s Tall Building SPG (2009). The accompanying Design and Access Statement submitted alongside this application considers the design rationale in full, however, we summarise here the main design considerations:
1. The height of the development is considered appropriate, as the site is located in a highly sustainable position and in an area which has been identified both in the LDP (Policy KP2(A)) and in the Tall Buildings SPG as suitable locations for tall buildings.

Furthermore, a number of tall buildings are located in close proximity to the site. In addition, further tall buildings are likely to emerge as part of the wider redevelopment proposals taking place in this strategic

regeneration area. For example, permission is already in place as part of the comprehensive mixed use development opposite the application site which includes permission for numerous tall buildings up, including up to 20 storeys in height (14/00430/DCI). It can therefore be said that the proposal will add to the existing/emerging cluster of tall buildings in the area.

2. The form and massing of the building provides an interesting silhouette, with a modelled top (varying between 18–22 storeys) helping to provide an individually identifiable building.
3. The treatment of the building includes high quality and robust materials to ensure a quality finish and longevity. Treatment of the building has also been designed to highlight the functions of the building;
4. The geometry and orientation of the building will successfully integrating with the street interface and the existing and emerging urban grain;
5. The building responds well to the street scene at groundfloor level; double height spaces are used to compliment the size of the building, while a commercial unit at groundfloor level will provide active frontage to engage with the street;
6. Limited parking is provided at the rear of the site to ensure its presence does not dominate at street level;
7. Useable open space is provided through the provision of two terrace areas at the 19th and 21st storeys.

6.18 The scheme is therefore considered to be of a suitable high-quality design that accords with both local and national policy and guidance in respect of design.

Sustainability

6.19 A golden thread running through the Cardiff LDP is the need for development to be sustainable. Point 7 of the LDP summary explains that:

“The Plan delivers sustainable development by meeting social and economic needs, but in a managed way which retains, manages and enhances important features of the natural and built heritage.”

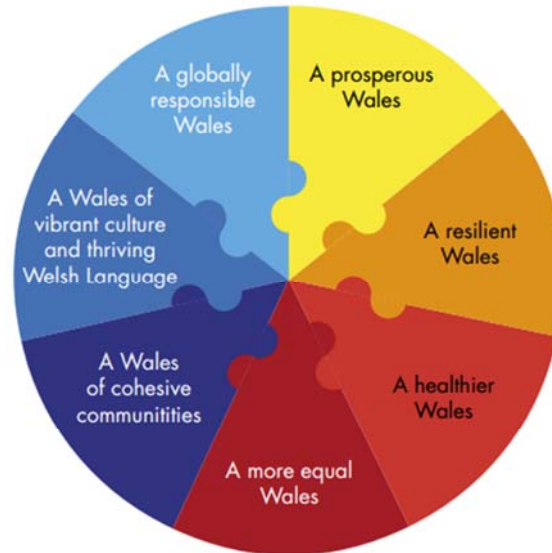
6.20 Paragraph 4.2.1 of PPW states that the planning system is necessary and central to achieving the sustainable development of Wales. Sustainable development is defined as

“The process of improving the economic, social and environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.”

6.21 Essentially this means carrying out development that positively impacts upon economic and social aspects of the local area without having a detrimental impact upon natural and built heritage.

6.22 In addition to the need to consider the sustainability of developments, the Well-being of Future Generations Act (Wales) 2015 establishes a 'sustainable development principle' which means that planning decisions need to accord with the 7 well-being goals that are set out in Figure 4.1 of PPW.

Figure 6.2 Well-being Goals



Source: PPW Figure 4.1

6.23 The redevelopment of this brownfield site complies fully with Cardiff Council and the Welsh Government's drive towards sustainable development. The application site is a brownfield site in a highly accessible location.

6.24 The site enjoys excellent public transport links, and is in close proximity to a range of facilities and services in Cardiff City Centre as well as being a short distance from facilities in Cardiff Bay. In terms of environmental sustainability, this reduces the need to travel and reliance on private transport. From a social perspective it also facilitates linked trips and access to a range of facilities in close proximity to each other.

6.25 The site's proximity to the City Centre and Cardiff Bay also ensure that it is closely located to significant areas of major employment. Again allowing for residents of the development to commute to work using sustainable forms of travel.

6.26 The proposed development makes effective use of the land through high density development, this is environmentally sustainable in terms of land take, but also has social benefits as it will deliver 109 homes for local people and provide a population of residents to support local services and facilities, including public transport.

6.27 The development will also provide significant economic benefits to the local community. These benefits include:

- Construction jobs for local people;

- Increased council tax payments to the council including new homes bonus;
- Increased spending in the local area as new homeowners seek to personalise their new property; and
- Spending on weekly goods at local shops and businesses by the new residents.

6.28 For the reasons outlined above it is considered that the proposed development is sustainable and is therefore in accordance with the LDP and PPW's sustainability policies as well as PPW's Well Being objectives.

Other Policy Considerations

Transport / Accessibility

6.29 As has previously been demonstrated in this statement, the site benefits from a highly sustainable and accessibly location.

6.30 A number of public transport options exist or are proposed close by to the site and can be accessed by the use of safe, direct and convenient pedestrian routes from the site. Furthermore, the proximity of local facilities and employment supported by cycle/pedestrian routes, as described elsewhere in this document, help to reduce the need for future residents to travel by car.

6.31 In terms of car parking, the development will deliver 35 spaces which equates to roughly 1 space per 3 units and is reflective of the site's highly central position. The provision of parking is in accordance with the parking standards that are set out in the Council's Access Circulation and Parking SPG that seek a maximum of 1 space per residential unit in all Central areas, with no minimum requirement to provide vehicle parking.

6.32 The modest level of parking to be provided on site is considered suitable and will provide added imputes for residents of the scheme to use sustainable modes of transport. This will assist Cardiff Council in meeting Policy KP8 of the LDP which seeks to achieve a target of 50:50 modal split between journeys by car and journeys by walking, cycling and public transport.

6.33 No visitor parking is proposed, again this is in line with guidance contained within the Council's Access, Circulation and Parking SPG which highlights that visitor parking is not a requirement for any residential development.

6.34 Given the very limited availability of parking at the site, it is deemed that the level of car borne travel will be insignificant and unlikely to have adverse impacts on the local highway network. This should also be considered against the background context that the site, that until recently was occupied by industrial/storage units that generated employee and visitor movements.

6.35 In addition, secure and sheltered cycle parking is provided on site for 115 cycle spaces including 6 visitor spaces.

What are the effects of the development on the natural and historic environment?

Natural Environment

- 6.36 As previously identified, the site is in a completely cleared state and no known ecological features exist on the site, while there are no statutory designated sites of nature interest in close proximity to the site.
- 6.37 Although the non-statutory River Taff SINC is located approximately 450m to the west of the application site, the SINC is physically separated from the site by a major road and existing built development, with further development set to come forward adjacent to the SINC as part of a major mixed use development scheme approved under planning permission (14/00430/DCI).
- 6.38 On the basis of the above, we do not anticipate that there will be any detrimental impacts to the natural environment as a consequence of the current proposed development.

Listed Buildings & Non-designated Heritage Assets

- 6.39 As previously illustrated, the site is not located in a sensitive area from a heritage viewpoint.
- 6.40 Given the proximity to heritage assets and the context of both existing built and emerging developments in the surrounding area, we do not consider the scheme will have any significant impacts upon heritage assets.

Have flood risk issues been considered?

- 6.41 The site falls within Flood Zone C1 (areas of the floodplain which are developed and served by significant infrastructure, including flood defences) as identified by TAN15 Development Advice Maps.
- 6.42 TAN 15 states that development within Zone C should only be permitted if determined by the planning authority to be justified in that location, development will only be justified if it can be demonstrated that:
- i. Its location in Zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; or*
 - ii. Its location in Zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region.*

And,

- iii. It concurs with the aims of PPW and meets the definition of previously developed land;*

iv. the potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in Sections 5, 7 and Appendix 1 of TAN 15 are found to be acceptable.

- 6.43 As has been previously identified in this statement, the application site and surrounding area has long been identified in numerous studies and policy documents as being in need of comprehensive regeneration. This has culminated in the site forming part of Strategic Site A in the adopted Local Development Plan as well as being designated as part of Cardiff Enterprise Zone. Consequently, both Criterion (i) and (ii) are met.
- 6.44 In terms of Criterion (iii), previously developed land is defined in PPW as, *“...that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure.”*
- 6.45 PPW also includes a preference for the re-use of land. It states, in paragraph 4.8.1, that, *“Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites...”*
- 6.46 Paragraph 4.8.2 further states, *“Many previously developed sites in built-up areas may be considered suitable for development because their re-use will promote sustainability objectives. This includes sites: in and around existing settlements where there is vacant or under-used land, commercial property or housing; which facilitate the regeneration of existing communities.”*
- 6.47 Paragraph 9.2.8 of PPW also states that, *“...local planning authorities should follow a search sequence, starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.”*
- 6.48 The site falls within PPW’s definition of *“brownfield site”*, as until recently the site was occupied by industrial/storage units – these units were demolished in 2015 under planning permission 14/1912/DCI in anticipation of the redevelopment of the site.
- 6.49 Finally for Criterion (iv), a Flood Consequence Assessment (FCA) has been prepared by Marsden Associates and accompanies this planning application in line with the recommendations in TAN15.
- 6.50 The FCA highlights that the site lies within an area which is developed and served by significant infrastructure including flood defences and a tidal exclusion barrier, which provides a significant level of tidal flood protection for the low lying areas of Butetown and Grangetown, including the application site.
- 6.51 The FCA also demonstrates that the site is considered to be free from fluvial flood risk (emanating from the River Taff) for both 200yr and 1000yr events.
- 6.52 We therefore do not consider risks associated with flooding to preclude the site from development.

Drainage

- 6.53 The proposed drainage arrangements are detailed in drawing no. C5006/DR1 (Drainage Scheme) that accompanies the application.
- 6.54 The proposals include a new surface water attenuation tank, and new storm water and new foul water sewer connections to the existing sewer system, subject to discussions and approval of Dwyf Cymru Welsh Water.

Has waste management been considered?

- 6.55 Chapter 12 of PPW sets out the Assembly Government's policy in relation to the reduction of waste and encouraging recycling. At the local level LDP Policy W2 seeks for the appropriate provision of facilities for storage, recycling and other management of waste in new developments.
- 6.56 Detailed advice on the nature and extent of waste collection and storage facilities is set out in the Council's Waste Collection and Storage Facilities SPG (March 2007).
- 6.57 The Applicant's design team has ensured that the scheme incorporates measures to encourage waste recycling and minimisation. On-site refuse storage is provided at groundfloor level in a secure compound that is accessible from within the site, as well as from Dumball Road. Provision has been made for 24 x 1100 litre bulk bins for waste, recycling and compost for the residential element of the scheme and a separate bulky refuse area containing a further 4 x 1100 litre bulk bins. In addition, the proposed commercial unit has private access to its own refuse area that will accommodate a further 1100 litre bin. The refuse compounds are directly accessible from Dumballs Road (via secure access) and are situated in close proximity to the public highway to aid collection.
- 6.58 The approach to be taken to construction on the site will also aim to minimise waste and ensure that opportunities for the reuse of waste are taken wherever practicable.
- 6.59 The Application proposals therefore accord with relevant policy requirements at national and local level.

Summary

- 6.60 In appraising the proposed development against national and local policy, it is clear that
- the principle of the residential proposal in this location is acceptable;
 - the commercial/retail element of the scheme will not detrimentally impact upon the vitality and viability of the Central Shopping Area,
 - the development density is appropriate for the site's context;
 - the development will deliver a suitably designed scheme;

- the development presents a sustainable form of development;
- the development is unlikely to have any adverse impacts upon the natural or built environment;
- the level of car parking to be provided is appropriate for the context of the development;
- the limited level of car borne travel associated with the development is unlikely to have an adverse impact on the local highway network;
- the development is justified against considerations of flood risk;
- the development incorporates appropriate facilities for the storage, recycling and management of waste

7.0 **Planning Obligations**

Section 106 including Affordable Housing

- 7.1 It is recognised that there is an anticipated requirement for contributions in respect of education, community facilities, public open space, as well as affordable housing.
- 7.2 Whilst we are aware of the need to consider the level of financial contribution and of affordable housing, in view of the likely viability issues being faced by the developer in regard to this site, these contributions are unlikely to be sufficient to meet Cardiff Council's target levels. A full viability assessment will be submitted during the determination process in order to inform discussions relating to Affordable Housing and other planning obligations.
- 7.3 This is entirely consistent with adopted Policy KP7 that recognises the need for development to be assessed on a case by case basis in relation to Planning Obligations.

Community Infrastructure Levy

- 7.4 Cardiff Council has yet to formally adopted CIL. The Council consulted on its draft CIL charging schedule between September and October 2016 and anticipate that the Charging Schedule will go to public examination in early 2017.
- 7.5 The draft Charging Schedule demonstrates an intention for all strategic housing development sites (and developments of 500 residential units or more) to be subject to a £NIL rate of CIL.
- 7.6 The application site is located within Strategic Site A of the LDP and as such, would not be subject to CIL should the draft charging schedule be adopted in its current form.

8.0 Conclusion

This Planning Statement has been submitted to accompany a full planning application for a mixed use development comprising 109 NO. 1 and 2 apartments (Use Class C3), ground floor flexible commercial unit (A1/A2/A3/B1/D1 Use), with access, car parking, cycle storage and refuse storage and associated works”.

- 8.1 This statement has explained that the principle of development of this site is well established as the site is allocated by Cardiff Council in its Local Development Plan as a strategic site for mixed use residential and commercial development.
- 8.2 The site is sustainable, being in close proximity to a number of local services, facilities and employment opportunities. Additionally, as wider strategic development activity takes place in this allocated enterprise zone, further services and employment opportunities are likely to be delivered which the development can support.
- 8.3 The development has been carefully designed to ensure that an attractive and legible place is delivered. The accompanying Design and Access Statement demonstrates that detailed context analysis and discussions have taken place with the LPA to ensure a well-designed scheme will come forward.
- 8.4 The statement has explained that the site can be developed without detrimentally impacting upon natural or historic features, while there are no technical issues that would preclude the development of the application site from being delivered.



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