

Planning Statement

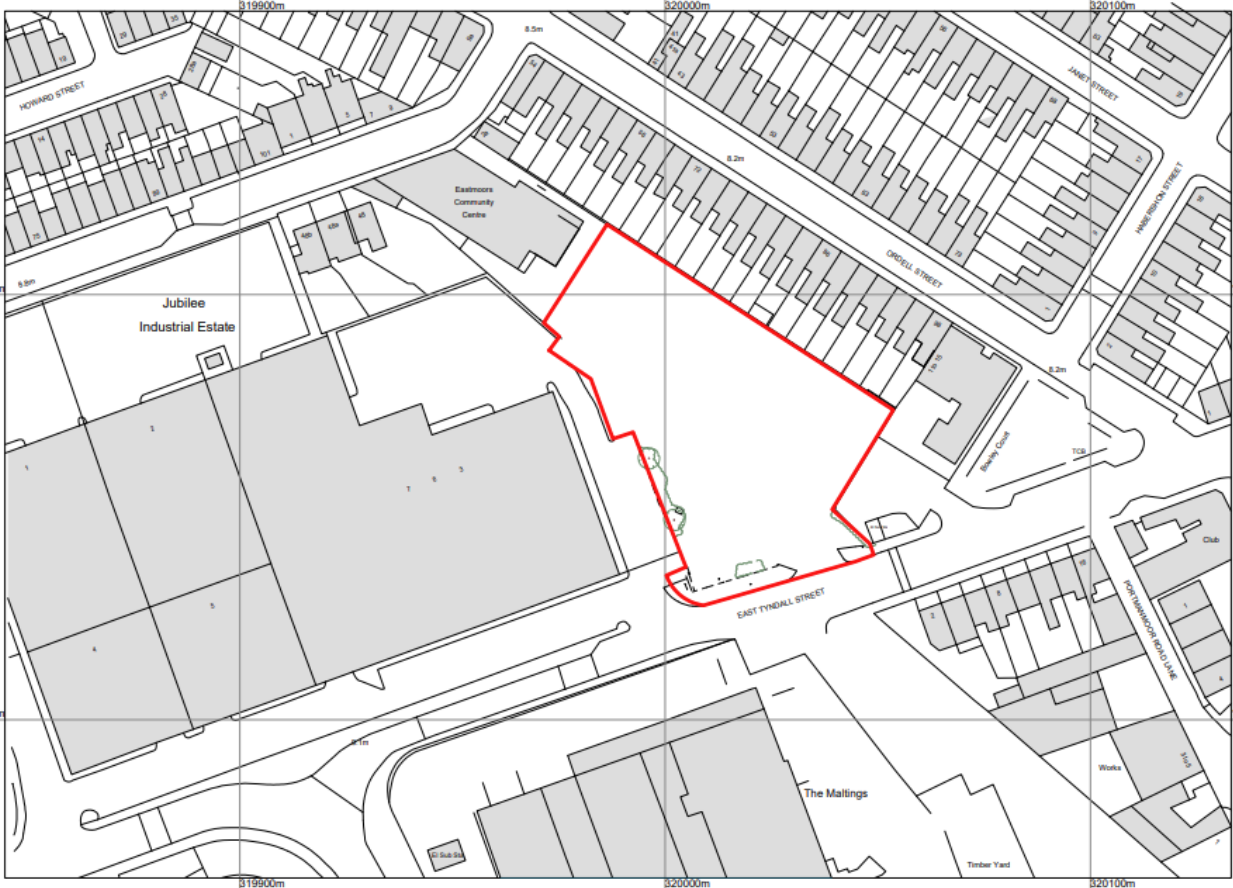
The Former Magnet Trade Centre,
East Tyndall Street

June 2025

amity

planning consultants



Introduction	
Client	This statement has been prepared on behalf of Cardiff Community Housing Association (CCHA).
Scope	This statement accompanies a full planning application for " <i>The demolition of the existing building and the construction of affordable housing units together with parking, landscaping and other associated works.</i> "
Site Details	
Site Address	The former Magnet Trade Centre, East Tyndall Street, Cardiff.
Site Location	<p>Fig.1 Site Location Plan</p> 
Site Description	<p>The proposed development site is located to the north of East Tyndall Street, within the Splott ward of Cardiff. The site extends to approximately 0.36 hectares and features a generally level topography at around occupying an irregular-shaped parcel of land.</p> <p>The site lies within a transitional urban area that reflects Splott’s industrial context while also forming part of a wider pattern of ongoing regeneration, characterised by increasing mixed-use and residential development. Strategically located, the site benefits from excellent connectivity and is in close proximity to major road links including access off the A4232 with connections to the A48. The site also well-served by public transport, providing frequent access to Cardiff city centre, and a close rail link for travel to other major cities.</p> <p>The site was most recently occupied by Magnet Trade Counters, who vacated the premises in early 2024 but it had been marketed by Knight Frank since 2020 with no serious interest. It is currently vacant and comprises</p>

	<p>a former warehouse and office facility. The principal structure, located on the northern portion of the site, consists of a metal-framed, metal-clad warehouse with a concrete floor slab, accessed via two large roller-shutter doors on its southern elevation. The warehouse is predominantly open-plan, with a small section repurposed as internal office space. Attached to the south-west of the warehouse is a two-storey office block, while a single-storey front extension accommodates additional toilet and office facilities. The southern portion of the site is surfaced in tarmac and concrete, and functions as vehicular access and parking. A separate triangular plot in the south-west corner of the site is currently fenced off and disused. The southern and western boundaries of the site are defined by metal fencing, which has become overgrown with vegetation, while the south-eastern boundary comprises brick and stone walls and a hedgerow, separating the site from the rear gardens of adjacent residential properties.</p> <p>The site lies at the edge of the Ocean Park Employment Area (Policy EC1.1), which includes a variety of industrial, commercial, retail, and office uses to the south and west. The site therefore benefits from direct access to local employment areas, while being well-positioned in relation to residential communities and the broader facilities of the city centre. A Grade II listed building, Eastmoors Youth Centre (designated April 2022), is also located immediately north of the site, while to the south of East Tyndall Street lies another Grade II listed building, The Maltings.</p>
Development Proposals	
The Scheme	<p>The application seeks Full Planning Permission for the redevelopment of the former Magnet Trade Centre and associated structures. The proposals include the demolition of the existing warehouse and associated buildings, and the delivery of a 100% affordable housing scheme comprising a total of 62 dwellings, along with associated works including landscaping, access, and parking.</p> <p>The proposed development consists of:</p> <ul style="list-style-type: none"> Block A - A 3/4/5 storey apartment block containing 52 common access apartments with the following mix: <ul style="list-style-type: none"> 39 number 2 person 1 bed apartments (2P1B) each approx. 50.40m² 13 number 3 person 2 bed apartments (3P2B) each approx. 58.60m² Block B – a pair of semi detached 2 storey blocks containing 4 No five person three bed townhouses (5P3B) each approx. 96.00m² Block C - A three storey apartment block containing 6 common access apartments (2 per floor) with 6 no. 2 person 1 bed apartments (2P1B) each approx. 51.30m² <p>The scheme has been carefully designed to respond to both pre application advice and the site's specific context to deliver a high-quality, sustainable residential development that meets local housing needs.</p>
Relevant Planning Policy	
Approach	<p>In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the development plan unless material considerations indicate otherwise.</p> <p>The Development Plan for the area comprises of the Cardiff Local Development Plan (LDP) 2006 – 2026 together with Future Wales – The National Plan 2040. Relevant material considerations in this instance are identified as including Planning Policy Wales, various Technical Advice Notes, and adopted Supplementary Planning Guidance.</p>

Local Development Plan

The adopted LDP provides the statutory framework for the development and use of land within Cardiff over the Plan period (2006–2026). The policies and details contained within this LDP is used by Cardiff Council to guide and control development and provide the statutory local policy context for determining planning applications.

The site is within the settlement boundary for Cardiff and is subject to the following designation:

- Existing Employment Land (EC1.1)

Fig.2 Adopted LDP Proposals Map (Cardiff LDP)

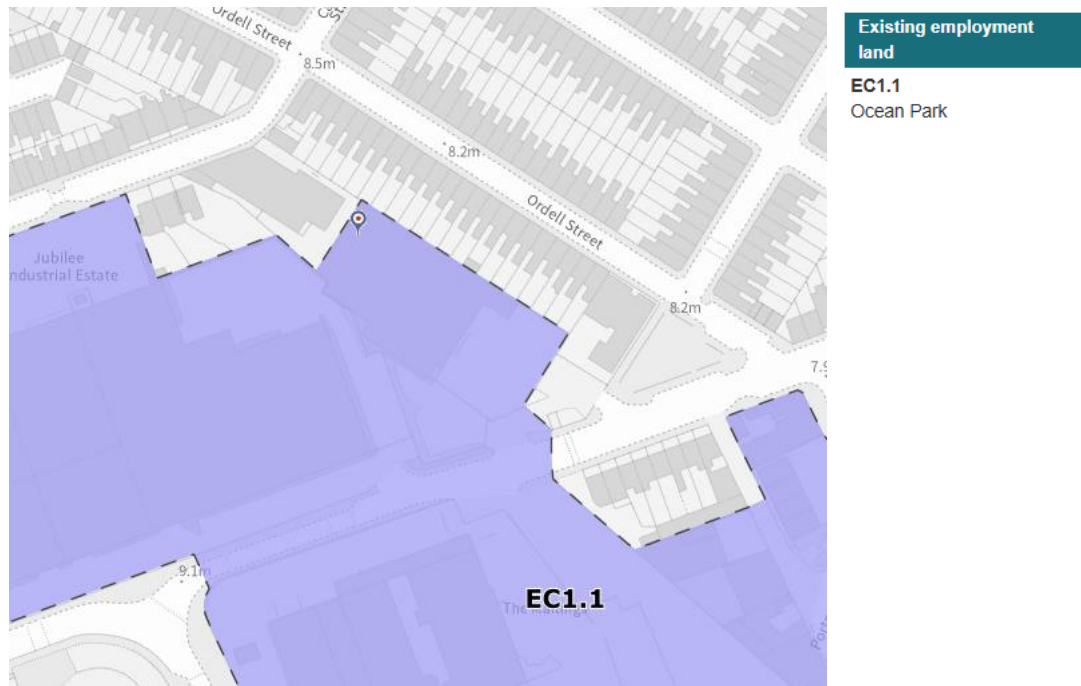
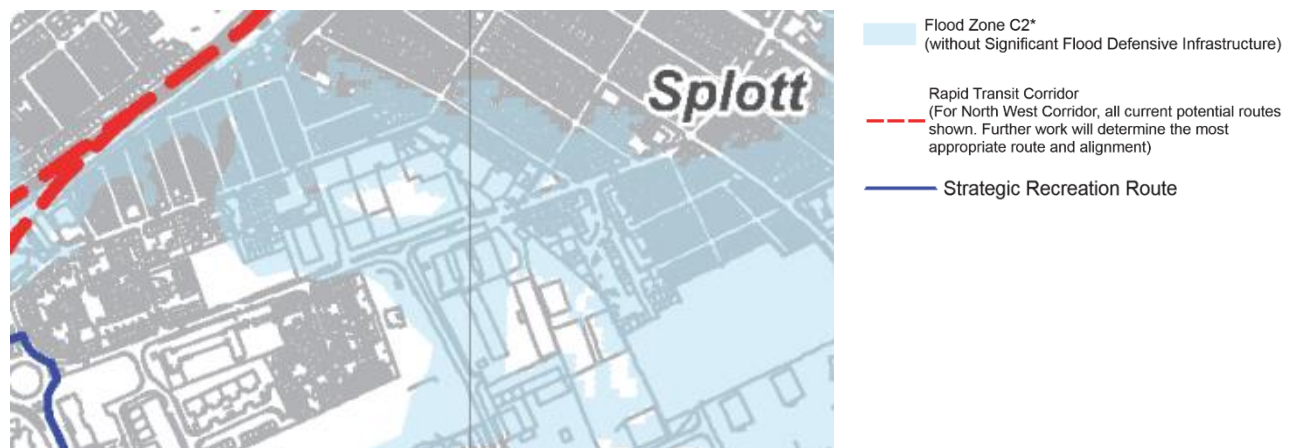


Fig.2 Adopted LDP Constraints Map (Cardiff LDP)



The following other LDP policies have been identified as relevant to the development proposals:

Policy KP4: Masterplanning Approach

In order to more effectively manage the form, uses, transportation solutions, phasing and appearance of major new developments, the LDP sets out a 'masterplanning approach'. This will provide greater certainty

to developers, the public and all other interested parties. The overall aim will be for the Council to set out a broad framework at the outset which will provide an overarching context for more detailed design and implementation work to follow. This Policy relates to all strategic sites and any other major new developments which may emerge over the Plan period.

Policy KP5: Good Quality and Sustainable Design

Policy KP5 identifies a range of assessment criteria to ensure that development delivers high quality sustainable design. It interprets the concept of good design beyond aesthetic considerations. High quality design is also recognised as a means for tackling climate change, and protecting and enhancing Cardiff's natural and built environment, amongst other.

The following criteria are considered relevant to the development proposals:

- i. 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.
- ii. Providing legible development which is easy to get around and which ensures a sense of continuity and enclosure.
- iii. Providing a diversity of land uses to create balanced communities and add vibrancy throughout the day.
- v. Providing a healthy and convenient environment for all users that supports the principles of community safety, encourages walking and cycling, enables employment, essential services and community facilities to be accessible by sustainable transport and maximises the contribution of networks of multi-functional and connected open spaces to encourage healthier lifestyles.
- vi. Maximising renewable energy solutions.
- ix. Promoting the efficient use of land, developing at highest practicable densities and where appropriate achieving the remediation of land contamination.
- x. Ensuring no undue effect on the amenity of neighbouring occupiers and connecting positively to surrounding communities.

Policy KP6: New Infrastructure:

Policy KP6 seeks to ensure that new developments, irrespective of their size, location, or land use, make appropriate provision for infrastructure.

Essential / Enabling Infrastructure:

- Transportation and highways including access, circulation, parking,
- public transport provision, walking and cycling;
- Utility services;
- Flood mitigation / defences"

Necessary Infrastructure:

- Affordable Housing;
- Community safety initiatives;
- Open space, recreational facilities, playgrounds, allotments;
- Protection, management, enhancement and mitigation measures relating to the natural and built environment;
- Waste management facilities including recycling and services"

Subsequent policies in the Adopted LDP specify the details of such infrastructure provision.

Policy KP7: Planning Obligations

Policy KP7 sets the framework for securing mitigation to address any impacts directly related to the development.

Policy KP8: Sustainable Transport

The purpose of this policy is to ensure that developments are properly integrated with the transport infrastructure necessary to make developments accessible by sustainable travel modes and achieve a necessary shift away from car-based travel.

The relevant requirements in this instance are as follows:

- i. Achieve the target of a 50:50 modal split between journeys by car and journeys by walking, cycling and public transport.
- ii. Reduce travel demand and dependence on the car;
- iii. Enable and maximise use of sustainable and active modes of transport;
- iv. Integrate travel modes;
- v. Provide for people with particular access and mobility requirements;
- vi. Improve safety for all travellers.

Policy KP12: Waste

Policy KP12 seeks to facilitate sustainable waste management. Of relevance in this instance is the third criteria which states that waste will be managed by “supporting the provision and maintenance of sustainable waste management storage and collection arrangements in all appropriate new developments”

Policy KP13: Responding to Evidenced Social Needs

This policy covers a range of measures to develop sustainable neighbourhoods, tackle deprivation and improve the quality of life for all.

The first criteria is of relevance which seeks the provision of “range of dwelling sizes, types and affordability including seeking to provide a target of 6,646 affordable dwellings over the remaining 12 years of Plan period”.

Policy KP14: Healthy Living

Cardiff will be made a healthier place to live by seeking to reduce health inequalities through encouraging healthy lifestyles, addressing the social determinants of health and providing accessible health care facilities. This will be achieved by supporting developments which provide for active travel, accessible and useable green spaces, including allotments.

Policy KP15: Climate Change

This Policy provides a framework for sustainable growth by promoting development that mitigates the causes of climate change and which is able to adapt to its likely effects. New development should be adhered to the following factors as relevant to the proposals:

- i. Reducing carbon emissions;
- iv. Promoting energy efficiency and increasing the supply of renewable energy;
- v. Avoiding areas susceptible to flood risk; and
- vi. Preventing development that increases flood risk.

Policy KP16: Green Infrastructure

This policy aims to ensure that Cardiff's green infrastructure assets are strategically planned and delivered through a green infrastructure network. It states that "proposed development should therefore demonstrate how green infrastructure has been considered and integrated into the proposals". It goes on to say that if development results in overall loss of green infrastructure, appropriate compensation will be required".

Policy KP18: Natural Resources

In the interests of the long-term sustainable development of Cardiff, development proposals must take full account of the need to minimise impacts on the city's natural resources and minimise pollution, in particular the following elements:

- i. Protecting the best and most versatile agricultural land;
- ii. Protecting the quality and quantity of water resources, including underground surface and coastal waters;
- iii. Minimising air pollution from industrial, domestic and road transportation sources and managing air quality; and iv. Remediating land contamination through the redevelopment of contaminated sites.

Policy H3: Affordable Housing

The aim of this policy is to assist the Council in meeting evidenced housing need by seeking an appropriate affordable housing contribution from new residential developments in the city. It echoes the approach contained in Policy KP13 and should be read in conjunction with 'Planning Obligations' Supplementary Planning Guidance (SPG) for a more comprehensive understanding.

This policy sets out that "the Council will seek 20% affordable housing on Brownfield sites and 30% affordable housing on Greenfield sites in all residential proposals that:

- i. Contain 5 or more dwellings; or
- ii. Sites of or exceeding 0.1 hectares in gross site area; or
- iii. Where adjacent and related residential proposals result in combined numbers or site size areas exceeding the above thresholds, the Council will seek affordable housing based on the affordable housing target percentages set out opposite."

The policy highlights that "affordable housing will be sought to be delivered on-site in all instances unless there are exceptional circumstances". The supporting text to this policy clarifies that "in negotiating affordable housing, each proposal's actual contribution will depend on that scheme's capacity for provision.

This will ensure that the affordable housing contribution in itself will not make the scheme unviable". The 'Planning Obligations' Supplementary Planning Guidance (SPG) provide further guidance on how to provide affordable housing contributions where provision cannot be delivered on site.

Policy H6: Change of Use or Redevelopment to Residential Use

Policy H6 provides support for the change of use or redevelopment of redundant previously developed land for residential use provided:

- i. There is no overriding need to retain the existing use of the land or premises and no overriding alternative local land use requirement;
- ii. The resulting residential accommodation and amenity will be satisfactory;
- iii. There will be no unacceptable impact on the operating conditions of existing businesses;

- iv. Necessary community and transportation facilities are accessible or can be readily provided or improved; and
- v. It can be demonstrated that the change of use to a more sensitive end use has been assessed in terms of land contamination risk and that there are no unacceptable risks to the end users.

Policy EC1: Existing Employment Land

The city's existing employment areas outside of the Central and Bay Business Areas (as designated on the Proposals Map) will be protected for B Use Class employment generating uses (together with appropriate ancillary and/or complementary uses and activities as referred to in Policy EC2) including EC1.1 Ocean Park.

Policy EC3: Alternative Use of Employment Land and Premises

Development of business, industrial and warehousing land and premises for other uses will only be permitted if:

- i. The land or premises are no longer well located for business, industrial and warehousing use; or
- ii. There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; or
- iii. There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and
- iv. There will be no unacceptable impact on the operating conditions of existing businesses.

This Policy provides criteria against which proposals for the change of use of business and industrial land and premises will be assessed. It will apply to existing, permitted and allocated business, industrial and warehousing land and premises and address:

- The need to retain a range and choice of well-located sites and premises attractive to business, industry and warehousing;
- Making the best use of redundant land and premises for alternative employment purposes;
- Where land and premises need to be retained because they are of local importance for employment opportunities.

Criteria for assessing whether land and premises remain well located for business, industrial and warehousing uses will include:

- Accessibility to the primary highway network, rail-freight facilities and the port;
- Accessibility by public transport; and
- Proximity to housing or other sensitive uses

Policy EN7: Priority Habitats and Species

Development proposals that would have a significant adverse effect on the continued viability of habitats and species which are legally protected or which are identified as priorities in the UK or Local Biodiversity Action Plan will only be permitted where:

- i. The need for development outweighs the nature conservation importance of the site;
- ii. The developer demonstrates that there is no satisfactory alternative location for the development which avoids nature conservation impacts; and
- iii. Effective mitigation measures are provided by the developer.

Where harm is unavoidable it should be minimised by effective mitigation to ensure that there is no reduction in the overall nature conservation value of the area. Where this is not possible compensation

measures designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species should be provided.

Policy EN8: Trees, Woodland and Hedgerows

Development will not be permitted that would cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value, or that contribute significantly to mitigating the effects of climate change.

Policy EN9: Conservation of the Historic Environment

Development relating to any of the heritage assets listed below (or their settings) will only be permitted where it can be demonstrated that it preserves or enhances that asset's architectural quality, historic and cultural significance, character, integrity and/or setting.

- i. Scheduled Ancient Monuments;
- ii. Listed Buildings and their curtilage structures;
- iii. Conservation Areas;
- iv. Archaeologically Sensitive Areas; v. Registered Historic Landscapes, Parks and Gardens; or vi. Locally Listed Buildings of Merit and other historic features of interest that positively contribute to the distinctiveness of the city.

Policy EN13: Air, Noise, Light Pollution and Land Contamination

Development will not be permitted where it would cause or result in unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of nature conservation, landscape or built heritage importance because of air, noise, light pollution or the presence of unacceptable levels of land contamination.

Policy EN14: Flood Risk

Development will not be permitted:

- i. Within tidal or fluvial flood plains unless it can be demonstrated that the site is justified in line with national guidance and an appropriate detailed technical assessment has been undertaken to ensure that the development is designed to alleviate the threat and consequences of flooding over its lifetime;
- ii. Where it would increase the risk of flooding from fluvial and/or tidal flooding or from additional run-off from the development in any location;
- iii. Where it would hinder future maintenance or improvement schemes of flood defences and watercourses;
- iv. Where it would cause adverse effects on the integrity of tidal or fluvial defences;
- v. Where ground floor bedrooms are proposed in areas at high risk of flooding.

Where appropriate the developer should demonstrate that they have considered the need to incorporate environmentally sympathetic flood risk mitigation measures such as Sustainable Urban Drainage Systems (SUDS).

Policy T1: Walking and Cycling

The purpose of this Policy is to maximise the potential for sustainable means of travel by favouring developments which include design features and facilities that make it easy for people to walk and cycle for everyday journeys instead of travelling by car.

As relevant to the development proposals, this policy states that “the Council will support developments which incorporate:

- v. Safe, convenient and attractive walking and cycling connections to existing developments, neighbourhoods, jobs and services;
- vii. Supporting facilities including, signing, secure cycle parking and, where necessary, shower and changing facilities.”

Policy T5: Managing Transport Impacts

The purpose of this Policy is to ensure that all new developments “properly address the demand for travel and its impacts, contribute to reducing reliance on the private car” and “make satisfactory provision for access, parking and circulation, particularly by pedestrians, cyclists, public transport users and disabled people with mobility impairments and particular access needs”.

Policy T6: Impact on Transport Networks and Services

In essence, this policy sets out that development will not be permitted when it will unacceptably harm the safe and efficient operation of the highway, public transport and other networks (such as pedestrian and cycle routes).

Policy C2: Protection of Existing Community Facilities

Proposals involving the loss or change of use of buildings currently or last used for community facilities will only be permitted if:

- i. An alternative facility of at least equal quality and scale to meet community needs is available or will be provided within the vicinity or;
- ii. It can be demonstrated that the existing provision is surplus to the needs of the community.

Policy C3: Community Safety/Creating Safe Environments

This policy requires all new development to promote a safe and secure environment and minimise opportunities for crime. It requires development proposals to, amongst other things:

- i. Maximise natural surveillance of areas which may be vulnerable to crime such as publicly accessible spaces, open space, car parking areas and footpaths;
- iii. Maintain perceptible distinction between public and private spaces through well-defined boundaries and defensible space;
- iv. Provide a good standard of lighting to public spaces and routes while minimising energy use and light pollution; and
- v. Be designed with management and maintenance in mind, to discourage crime in the present and future.”

Policy C5: Provision for Open Space, Outdoor Recreation, Children’s Play and Sport

This policy is aimed at securing the provision or improvement of open space and other appropriate outdoor recreation and sport in conjunction with all new residential developments over 8 units and on-site provision of functional open space in conjunction with all new residential developments over 14 units.

	<p>The policy identifies that “the amount of open space provision generated by a housing proposal will be assessed in relation to its type and density. Consideration will also be given to the availability and adequacy of existing functional open space within the surrounding area.”</p> <p><u>Policy W2: Provision for Waste Management Facilities in Development</u></p> <p>This policy sets out that “where appropriate, provision will be sought in all new development for facilities for the storage, recycling and other management of waste”.</p> <p>Supporting text provides further guidance on how to achieve sustainable waste management. “All developments will be to provide:</p> <ul style="list-style-type: none"> • On-site waste, recycling and composting, separation and storage facilities; • Communal waste, recycling and composting, separation and storage facilities for larger developments; and, • Access arrangements for refuse vehicles and personnel for collection purposes”
Cardiff Supplementary Planning Guidance	<p>Supplementary Planning Guidance (SPG) is produced to provide further detail on certain policies and proposals contained within Cardiff’s Development Plan. They help ensure that certain policies and proposals are better understood and applied effectively.</p> <p>SPG do not have the same status or weight as adopted Development Plan policies. However, the Government advises that they may be considered as a material consideration in determining planning applications. The following SPG document are relevant:</p> <ul style="list-style-type: none"> • Planning for Health and Wellbeing (November 2017) • Safeguarding Business and Industrial Land and Premises (November 2017) • Managing Transportation Impacts (Incorporating Parking Standards) (July 2018) • Planning obligations (January 2017) • Residential Design Guide (January 2017) • Waste Collection & Storage Facilities (October 2016) • Green Infrastructure (including Technical Guidance Notes relating to: Ecology and Biodiversity; Trees and Development; Public Rights of Way and Development; River Corridors; Protection and Provision of Open Space in New Developments; Soils and Development) (November 2017) <p>It is noted that the Cardiff Waste Collection & Storage Facilities SPG is due to be updated imminently. Bin Storage requirements will be provided to this effect.</p>
Future Wales: The National Plan 2040	<p>Future Wales: The National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It forms part of the development plan and provides a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.</p> <p>As described above, the Welsh development framework has been designed incorporating the principles of sustainable development at its core. This comes as a result of the Well-being of Future Generations (Wales) Act 2015 ('the Act') that gives a legally-binding common purpose – the seven well-being goals – to the public sector to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.</p>

In a more detailed level, the National Plan contains 18 strategic and spatial policies. In view of the nature of the development proposals, the policies below have been identified as relevant to the scheme:

Policy 1 – Where Wales will Grow

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

Policy 7 – Delivering Affordable Homes

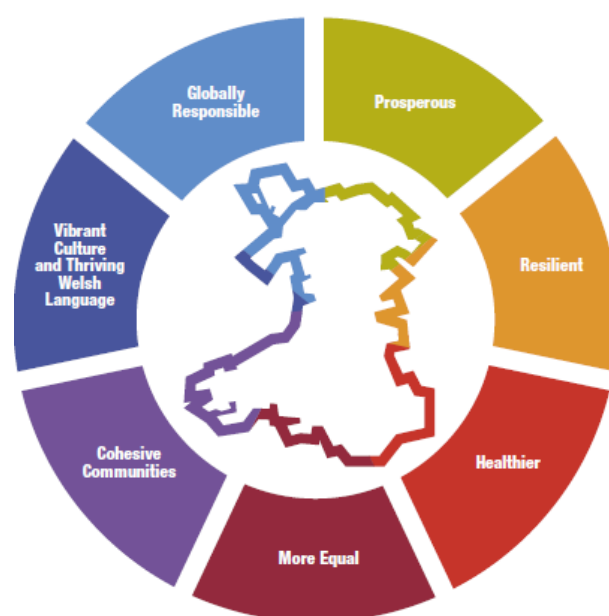
Policy 8 – Flooding

Policy 9 – Resilient Ecological Networks and Green Infrastructure

Policy 11 – National Connectivity

Policy 12 – Regional Connectivity

Fig.4 The Seven Goals of the Well-being of Future Generations (Wales) Act 2015



Policy 7 of the National Plan states that the housing need estimates indicate that the provision of affordable homes should become a key focus for housing delivery. It is estimated over the next five years (2019-20 – 2023-24), under the central estimate, that on average the estimated annual additional homes are split almost equally between affordable housing (social housing or intermediate rent) and market housing. This represents an average of approximately 3,500 (48%) affordable homes and 3,900 (52%) market homes per year over the five year period. Providing housing in Wales at levels which meet our needs is a key priority for the Welsh Government.

The planning system must facilitate the provision of additional market and affordable housing. There is a complex picture of housing need and provision with the opportunities people have varying significantly depending on income and where they live in Wales.

Planning Policy Wales

Planning Policy Wales (12th Edition, February 2024) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. It encourages a wider, sustainable and problem solving outlook which focuses on integrating and addressing multiple issues rather than on an approach which is fragmented, un-coordinated and deals with issues in isolation.

Paragraph 2.8 acknowledges that “planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales” and “the most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making planning policy and decision making” as per Paragraph 2.9.

PPW defines placemaking as a “holistic approach to the planning and design of development and spaces, focused on positive outcomes”. This approach “considers the context, function and relationships between a development site and its wider surroundings” and “adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary”.

Fig.5 PPW Themes Collectively Contribute to Placemaking (extract from PPW Edition 12)



In light of the nature of the development proposals and their location, the following themes and policy topic areas are identified as relevant.

1. STRATEGIC & SPATIAL CHOICES

Effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the development of specific proposals, or when formulating a development plan.

Good Design

Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area. PPW 12 sets out five key aspects of good design which are essential to make placemaking happen:

1) Access and Inclusivity

This can be achieved “making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children” (Paragraph 3.6) and through measures and features that “enable easy access to services by walking, cycling and public transport” and “encourage people to meet and interact with each other”.

2) *Environmental Sustainability*

Paragraph 3.7 states that “developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement (Paragraph 3.7)” and be resilient through “an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment”

Paragraph 3.8 highlights that “landscape and green infrastructure considerations are an integral part of the design process” and, in a similar manner, addressing land contamination, instability and flood risk and providing for biodiversity benefits should be part of the design.

3) *Character*

Paragraph 3.9 highlights that “the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations”. It goes on to say that “the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials” will be particularly important in areas recognised for their particular landscape, townscape, cultural or historic character and value.

4) *Community Safety*

Paragraph 3.11 establishes that “crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions”

5) *Movement*

Paragraph 3.12 states that good design in this matter means “minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys”. It also remarks that “existing infrastructure must be utilised and maximised, wherever possible”.

Previously Developed Land

Paragraph 3.55 emphasises the preference of previously developed land as opposed to greenfield sites. It advises that “previously developed (also referred to as brownfield) land [...] should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome”.

The PPW definition of previously developed land is land “which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure”.

2. ACTIVE & SOCIAL PLACES

Transport

Paragraph 4.1.11 sets out that “development proposals must seek to maximise accessibility by walking, cycling, and public transport, by prioritising the provision of appropriate on-site”. In this respect, “the sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications” as per Paragraph 4.1.14. The

Welsh Government policies set out the sustainable transport hierarchy which is, in this order, from walking and cycling, public transport, ultra-low emissions vehicles to other private motor vehicles.

Active travel is a cornerstone of the transport policies in Wales. Paragraph 4.1.31 confirms that “planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling”.

With regards to vehicle parking, Paragraph 4.1.50 advises that a design-led approach should ensure that “appropriate level of car parking is integrated in a way which does not dominate the development”. Paragraph 4.1.35 requires new development to “provide appropriate levels of secure, integrated, convenient and accessible cycle parking”.

Housing

Paragraph 4.2.1 advises that “new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities”.

Paragraph 4.2.17 acknowledges the potential on brownfield sites to deliver further housing when saying that “maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites”.

Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by local authorities as the preferred locations for most new development including housing and employment provision. The approach should be supported by the service delivery plans of local service providers.

Affordable Housing

Para 4.2.26 advises “A community’s need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications. Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers.”

3. DISTINCTIVE & NATURAL PLACES

Green infrastructure

Paragraph 6.2 defines green infrastructure as “the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places” and “at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks”.

Paragraph 6.2.5 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that “with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places”. It is also advised that “there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents”.

	Paragraph 6.4.21 establishes that “planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible”.																								
Technical Advice Notes	<p>Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:</p> <ul style="list-style-type: none">• TAN 2: Planning and Affordable Housing (2006)• TAN 4: Retail and Commercial Development (2016)• TAN 5: Nature Conservation and Planning (2009) Noting also the Chief Planning Officer letter dated 23/10/19: securing bio-diversity enhancement• TAN 11: Noise (1997)• TAN 12: Design (2016)• TAN 15: Development, flooding and coastal erosion (2025)• TAN 18: Transport (March 2007)• TAN 21: Waste (February 2017)• TAN 23: Economic Development (2014)																								
Planning History																									
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Engagement																									
Pre-Application Enquiry	The proposals have been subject to detailed pre-application engagement with the Local Planning Authority with reference PA_24_00133. The insights and recommendations obtained during this initial engagement played a role in the evolution of the scheme. The specific outcomes of this engagement in relation to the design of the scheme are addressed throughout this statement.																								

	<p>The overarching conclusion of the Local Authority is that the principle of affordable housing in this location can be supported subject to a financial contribution to mitigate the loss of employment land. As advised, amended proposals have been provided to exemplify appropriateness of design, materials, scale, massing, street scene, landscaping and residential amenity.</p>
Analysis	
Principle of Development	<p>The application site lies within the defined settlement boundary in the adopted Cardiff Local Development Plan (2016) and is located within Ocean Park, which is allocated for B Use Class employment-generating uses under Policy EC1:1. As such, the proposed redevelopment of the site for residential purposes must be considered against the criteria set out in Policy EC3, which seeks to control the alternative use of business, industrial and warehousing land, on balance with Policies H3 and H6.</p> <p>Policy EC3 – Alternative Use of Employment Land</p> <p>Policy EC3 identifies a range of criteria against which applications for the alternative use of business and industrial land will be assessed. It states that development of business, industrial and warehousing land and premises for other uses will only be permitted if it can be demonstrated that:</p> <ol style="list-style-type: none"> The land and premises are no longer well located for business, industrial and warehousing use; There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; There is no need to retain the land and premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and There will be no unacceptable impact on the operating conditions of existing businesses. The above criteria demonstrate that consideration will only be given to alternative uses where an applicant is able to clearly demonstrate that there is no demand for the site and that it is unviable to retain the site in employment uses, including the prospects of refurbishment of the existing premises or the redevelopment of the site for new employment uses. <p>The application is supported by detailed marketing and viability evidence prepared by Knight Frank, which demonstrates full compliance with these criteria as outlined below:</p> <p><u>i. The land and premises are no longer well located for business, industrial and warehousing use</u> The site is located within an area of transitional character, where former employment uses are increasingly being replaced or bordered by residential developments, education facilities, and mixed-use schemes. The site directly adjoins the rear gardens of residential properties and lies in close proximity to the new Willows High School development, further limiting its compatibility with ongoing B-class employment use. As such, the location is no longer considered suitable for traditional industrial or warehousing operations, which typically require greater separation from sensitive neighbouring uses.</p> <p><u>ii. There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaptation/refurbishment or redevelopment</u> The site has been actively marketed by Knight Frank since 2020 with no serious expressions of interest. The existing warehouse building, previously occupied by Magnet Trade is in poor condition, and does not meet the needs of modern occupiers as exemplified in the appended study. The building is physically unsuitable for adaptation, with its outdated configuration and specification rendering refurbishment or reuse economically unviable. Furthermore, the size, layout, and access arrangements of the site do not support subdivision or redevelopment for modern B-class uses. There are now several schemes being planned close to the M4 that will offer more accessible units without the need for compromise and noting that the existing buildings are not capable of refurbishment. This matter has been acknowledged by the LPA.</p>

iii. There is no need to retain the land and premises for business, industrial or warehousing use, having regard to demand and the requirement to provide for a range and choice of such uses

The submitted evidence confirms a lack of demand for employment uses on this site, despite sustained marketing over several years. Knight Frank's assessment also notes that modern employment occupiers are increasingly favouring strategic locations closer to the M4 corridor, where purpose-built facilities are being brought forward to meet current needs. In this context, there is no identified need to retain this site for employment use, particularly given Cardiff's wider supply of more suitable and deliverable employment land.

iv. There will be no unacceptable impact on the operating conditions of existing businesses

The proposed residential use of the site will not result in any unacceptable impacts on existing nearby businesses. The layout and design of the development have been carefully considered to avoid conflict with adjacent commercial uses, many of which are also transitioning or already co-exist alongside residential development. Given the changing character of the area and the proximity of residential neighbours, the proposed use is considered more compatible with the surrounding context than continued industrial or warehousing activity.

v. The proposal clearly demonstrates there is no demand for the site and that it is unviable to retain it in employment use, including refurbishment or redevelopment for new employment purposes

The supporting evidence clearly establishes that the site is no longer viable for employment use, either through refurbishment of the existing premises or redevelopment for new employment uses. The extended period of marketing, lack of interest, physical limitations of the building, and changing character of the surrounding area all contribute to the conclusion that the retention of the site for employment purposes cannot be justified. The building's obsolescence, coupled with its incompatibility with neighbouring residential and educational uses, confirms that a transition to alternative use is appropriate and in the public interest.

This assessment confirms that the proposal complies fully with the tests set out in Policy EC3, and that there is a robust justification for the site's release from employment land protection. The proposed redevelopment for 100% affordable housing would deliver significant social and community benefits, while making effective use of a previously developed site that no longer serves its original employment function, in line with broader local and national policy objectives.

In addition to policies that seek to safeguard the site's employment use, Policies H3 and H6 are also of direct relevance to the proposed change of use to residential. These policies must be considered in the context of the site's potential to deliver new housing, with particular regard to the provision of affordable housing as part of a sustainable and inclusive development strategy.

Policy H3 – Affordable Housing

In accordance with Cardiff LDP 6th Annual Monitoring Report (October 2022), the Adopted LDP sets a target for the delivery of 6,646 affordable units to be provided between 2014 and 2026. The monitoring reveals that 1,797 new build affordable dwellings were completed between 2014 and 2022. Whilst the Monitoring Report claims that this is evidence of 'good progress' being made in delivering affordable housing to meet the identified affordable housing need, in reality just 27% of the need has been met, despite being two-thirds of the way through the plan period.

Moreover, an acute housing need specific to the ward of Splott has been identified by the Cardiff Local Authority Prospectus 2023-24 – this states that there is a deficit of 2112 homes in the Splott ward.

The proposed development aims to deliver 62 affordable homes with a mix of 1 and 2 bedroom apartments as well as 3 bedroom homes making a meaningful contribution to addressing the significant shortfall in affordable housing provision both across Cardiff and within the ward of Splott specifically.

The provision of 62 new affordable homes in the context of persistent under-delivery and acute demand should be afforded substantial weight in the determination of this application.

Policy H6 – Change of Use or Redevelopment to Residential Use

The LDP states that change of use of redundant premises or redevelopment of redundant previously developed land for residential use will be permitted where:

- i. There is no overriding need to retain the existing use of the land or premises and no overriding alternative local land use requirement
- ii. The resulting residential accommodation and amenity will be satisfactory;
- iii. There will be no unacceptable impact on the operating conditions of existing businesses;
- iv. Necessary community and transportation facilities are accessible or can be readily provided or improved; and
- v. It can be demonstrated that the change of use to a more sensitive end use has been assessed in terms of land contamination risk and that there are no unacceptable risks to the end users.

The proposal seeks to redevelop redundant previously developed land for residential purposes. It is asserted that the proposal meets the following requirements:

i. There is no overriding need to retain the existing use of the land or premises and no overriding alternative local land use requirement

The site is no longer in active employment use, with Magnet Trade vacating the premises in early 2024 following a period of 4 years of unsuccessful marketing. The building is also physically unsuitable for modern employment use as detailed above, and its proximity to residential properties and a new school limits its commercial viability. There is therefore no overriding need to retain the existing use, and no identified alternative local land use requirement.

ii. The resulting residential accommodation and amenity will be satisfactory

The proposal will deliver 62 high-quality affordable homes and apartments, comprising a mix to suit various occupiers with varying needs within a thoughtfully designed site layout. The development has been carefully designed to DQR standard and ensures adequate separation distances, private amenity space, and active frontages, in accordance with Cardiff Council's design and space standards. Landscaping and public realm improvements are also proposed, ensuring a satisfactory level of amenity for future occupiers. Full details of these proposals can be found in the Design and Access Statement.

iii. There will be no unacceptable impact on the operating conditions of existing businesses

The proposed layout and building orientation minimise any potential conflict with nearby commercial properties. The residential use is considered more compatible with the site's immediate surroundings than continued industrial or warehouse use. As such, the scheme will not result in any unacceptable impact on the operation of nearby businesses.

iv. Necessary community and transportation facilities are accessible or can be readily provided or improved

The site is located in one of the most accessible locations within the City, located within walking distance of local amenities and services in Splott and Tremorfa, including schools, parks, shops, and community facilities. Notwithstanding the close proximity of essential services and amenities within easy walking distance, the site is also exceptionally well connected by both public transport and cycling infrastructure, significantly expanding access to the wider city and beyond. Regular bus services operate along East Tyndall Street and

adjacent routes, providing convenient links to Cardiff city centre and major employment areas. In addition, Cardiff Central Railway Station is located less than 15 minutes away by foot or a few minutes by bike, offering direct rail connections across South Wales and to other major cities. The area is also served by dedicated cycle routes that form part of the wider Active Travel network, enabling sustainable, safe, and efficient travel to key destinations such as Cardiff Bay, University Hospital of Wales, Cardiff University, and Roath and Bute Parks. This high level of sustainable connectivity ensures that future residents will have excellent access to employment, education, healthcare, leisure, and retail facilities without reliance on private vehicles. Furthermore, highway improvements will be delivered as part of the development including a new pedestrian crossing of East Tyndall Street, which will be secured via appropriate agreements.

v. It can be demonstrated that the change of use to a more sensitive end use has been assessed in terms of land contamination risk and that there are no unacceptable risks to the end users

As part of the planning process, a Phase 1 Site Investigation has been undertaken. The assessment identifies that the site, as previously developed land with historical industrial use, may present a contamination risk. However, this has been fully considered, and the proposal includes measures for further investigation and remediation (if necessary) to ensure the site is suitable for residential use, with no unacceptable risks to future occupants.

In conclusion:

- The proposal seeks to redevelop a vacant, previously developed brownfield site within the Cardiff settlement boundary, delivering 62 affordable homes in a sustainable and well-connected location.
- The scheme aligns with the strategic aims of the Cardiff Local Development Plan (LDP), Planning Policy Wales (Edition 12), and the aims of Future Wales contributing positively to economic, social, and environmental objectives within a highly sustainable location.
- In accordance with Policy EC3, robust evidence demonstrates the site is no longer suitable or viable for employment use. The building is physically obsolete and unsuitable for modern businesses and has been marketed extensively with no uptake.
- The scheme will deliver 100% affordable housing, addressing identified local need and supporting Cardiff's commitment to increasing access to affordable homes as sought by Policy H3 and wide4r national policy.
- The scheme offers a compatible change of use in line with Policy H6.

It is therefore concluded that the principle of the proposed development is in full accordance with the development plan and is consequently acceptable.

Residential
Amenity

As well as the provision of sufficient levels of private amenity space and safe spaces for circulation and living for new occupiers as detailed further in this document, the relationship of the development with existing residents, notably along Ordell Street has been a matter of significant consideration in the design's evolution. As depicted in the plans and 3D renders provided, there are no habitable room windows in the Eastern gable to ensure no overlooking of the rear residential properties on Ordell Street and Block A is 3 storey at the northern end where it is closest to one of the pairs of 2 story houses. The flat roof reduces the perceived scale and the relative angles of the blocks ensures that overlooking and overshadowing are not an issue.

A detailed report has also been obtained from the Designing Out Crime Officer (DoCO) and all measures in that report have been adopted in the design. As affordable housing funded by Welsh Government the development is required to achieve an SBD Gold rating, which will ensure that the site is safe and secure for residents. Therefore there is clear confirmation that existing residents will not be impacted negatively in this regard due to the development proposals.

<p>Transport and Movement</p>	<p>To address Policy T1, amongst others, a suitable Transport Statement is being prepared to support the application by Lime Transport.</p> <p>The site benefits from direct access to East Tyndall Street, a key road which links with the wider regional highway network. The proposed site access will utilise the existing crossover location, with minor alterations to accommodate the new layout. A 5-metre-wide carriageway will serve the residential units, with 2-metre footpaths on either side providing safe, segregated pedestrian access. The design integrates with emerging Active Travel improvements in the area, including those set out in Cardiff Council's Willows High: Active Travel & Road Safety Improvements strategy.</p> <p>A continuous footpath will be retained along East Tyndall Street, enhanced with dropped kerbs and tactile paving, and extended into the site to connect all key residential frontages. Movement through the development prioritises pedestrian safety, with traffic-calmed shared surfaces and linear rain gardens providing separation, visual interest, and discouraging informal parking. Vehicle movements within the site are minimal and primarily limited to access for four townhouse parking spaces, emergency services, and deliveries. The internal road layout includes a turning area designed to accommodate service vehicles, allowing them to enter and exit in forward gear.</p> <p>Cycle storage is provided in accordance with the Transport Impacts SPG (Table P9), which requires one space per bedroom.</p> <ul style="list-style-type: none"> Block A requires 65 spaces. The current layout shows 44 vertical spaces, with provision to increase to 65 using two-tier racks. Additional Sheffield stands will be included for accessibility. The secure store is accessed directly from the footpath on the eastern side and internally via the ground floor corridor. Block B (Houses) require 2 spaces per dwelling. Secure, SBD-compliant garden sheds in the private rear gardens will accommodate at least 3 bikes each, along with general storage. Block C requires 6 spaces, provided in a secure, SBD-compliant cycle store with a green roof, located in the private rear communal area. <p>The site is furthermore situated in a highly sustainable location with excellent access to a range of local services, employment opportunities, and sustainable transport options. The site benefits from its close proximity to Cardiff city centre, which is within comfortable walking and cycling distance, thereby reducing the reliance on private car travel. The area is well-served by public transport, with several bus routes operating along nearby road. Key services include routes 1, 2, 3, 11, 44, 57, 132, and 96, with stops located within a short walking distance of the site. These routes offer regular services to destinations such as Cardiff Bay, Albany Road, Tremorfa, Splott, and St. Mellons, supporting sustainable travel choices for residents and reducing reliance on private cars.</p> <p>The central train station is also well connected to the site offering transport to wider locations. Overall, the site's location aligns with the principles of sustainable development as promoted by national and local planning policy, supporting a modal shift aimed for by the LPA. As such, the level of vehicular traffic generated by the proposed development is expected to be modest and can be accommodated safely within the existing highway network without adverse impact on local traffic conditions or road safety.</p>
<p>Landscape & Green Infrastructure</p>	<p>The redevelopment of this site presents a significant opportunity to transform the existing redundant, overgrown industrial land into a high-quality, attractive residential environment. The current condition of the site, characterized by derelict buildings and unmanaged vegetation, offers substantial scope for landscape improvement. Through sensitive design, the proposal will introduce thoughtfully planned green spaces, enhanced habitats, and improved boundary treatments that contribute positively to local biodiversity and visual amenity. The application is supported by a Landscape Strategy as well as a Green Infrastructure Statement.</p>

Fig.10 Landscape Strategy



The proposed development incorporates a comprehensive green infrastructure strategy designed to enhance biodiversity, improve amenity, and support sustainable urban drainage, in line with best practice and planning policy objectives.

Key landscape features include the retention and protection of existing mature trees, groups of trees, and hedges along the site boundaries. This approach minimises tree removal and preserves valuable vegetation, maintaining the site's established green framework. To further compensate for any vegetation loss and strengthen the local landscape, native tree planting will be introduced around the site. These species not only offer longevity but also contribute positively to the wider ecological network.

Native hedgerows will also be planted along site boundaries to create a soft, natural edge to the development. These hedges will provide essential food sources and habitat for birds, while also enhancing ecological connectivity throughout the area. To support pollinators such as bees and butterflies, the edges of the site will be seeded with wildflower mixes, which add visual amenity and foster vital habitats. The use of shrub planting will also be implemented with a focus on species known to benefit local wildlife. This will be used to soften building frontages, creating a more inviting environment for residents while supporting biodiversity.

Sustainable Urban Drainage Systems (SUDS) features, including rain gardens, will be densely planted with an appropriate mix of species to improve water quality, reduce surface water runoff, and enhance on-site biodiversity. Along the eastern boundary, native hedges, trees, and meadow grass will enhance ecological corridors, promoting wildlife movement and diversity. The southern acoustic boundary will also be softened with native tree and hedge planting to reduce noise impact and provide additional ecological value.

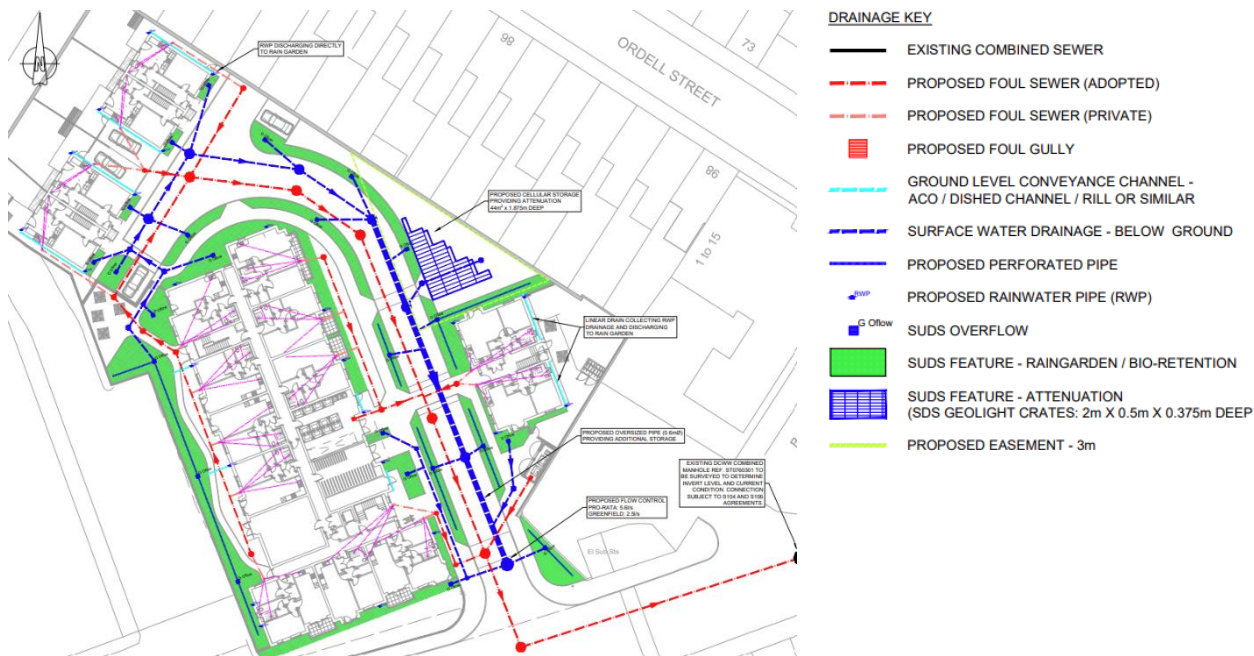
The design of footpaths have also been considered and stepped back where appropriate to allow space for landscaping elements to thrive.

	<p>Overall, the landscaping scheme delivers high-quality, multifunctional green spaces that support the development's sustainability objectives, improve visual amenity, and provide ecological enhancements in line with Cardiff LDP policies and the wider goals of placemaking.</p>
Ecology	<p>Policies KP15, KP16, EN6, EN7 and EN8 of the LDP seek to ensure that green infrastructure is protected, enhanced, the effects of climate change mitigated and ecological networks, biodiversity interests, priority habitats and species are protected and enhanced.</p> <p>To support the planning application a bat report has been commissioned to investigate if bats use the current property in any capacity during the maternity season, and for any evidence suggesting that bats use the property at other times of the year.</p> <p>No bats were observed emerging from the building, and only a very low number of bat calls were recorded throughout the monitoring period. Consequently, the proposed works are considered to have a negligible impact on the local bat population. The building was assessed as having moderate potential for roosting bats under survey guidelines, due to limited visibility of the roof and the presence of some internal timber cladding, although in practice, the structure offers low suitability for bat habitation, particularly given the thermal properties of the metal cladding and its poor connectivity to wider ecological corridors. No evidence of nesting birds was recorded, and the building lacks significant hibernation potential for bats. However, as a precautionary measure, a soft strip of internal roof cladding will be undertaken under the supervision of a qualified ecologist. Should any evidence of bats be found during works, activity would cease immediately, and a licence would be sought from Natural Resources Wales before resuming.</p> <p>The development presents an opportunity to deliver biodiversity enhancements, in line with the requirements of the Environment (Wales) Act 2016 and PPW Edition 12 which are addressed in the earlier section of this document "Landscape and Green Infrastructure". This includes the incorporation of new roosting features for crevice-dwelling bats within the proposed buildings. These features will be located away from direct lighting, with a 'dark corridor' retained to allow safe commuting routes. A sensitive lighting strategy will also be developed to minimise disturbance to foraging and commuting bats.</p> <p>It is concluded that the resulting proposal can be delivered sensitively and without harm to protected species, as well as offer significant enhancement in terms of ecological context and habitat creation.</p>
Flood Risk	<p>The existing building footprint lies within Flood Zone 1 of the Flood Map for Planning, whilst the southeast of the site lies within Flood Zone 2. A comprehensive FCA has been prepared for this submission. The site is located within the TAN-15 Defended Zone. Redevelopment proposals within the TAN-15 Defended Zone are justified provided that they are consistent with the acceptability considerations set out in Section 11 of TAN-15.</p> <p>The FMfP mapping indicates surface water flooding at the former car park due to a slight topographical depression and runoff from nearby buildings, with a small area of Flood Zone 3 linked to central drain gullies designed for positive drainage— something not fully captured by the generalised national-scale modelling used by NRW. This modelling often overlooks urban drainage features and culverted watercourses, potentially misrepresenting flood risks. Moreover, Planning permission (planning reference-21/02138/MJR) was granted in September 2021 for the Cardiff Coastal Flood Defence scheme. This scheme will provide improved flood defences along the banks of the River Rhymney and the Severn Estuary. The coastal defences comprise four main sections and will enhance the standard of protection across this area to increase resilience to climate change for much of eastern Cardiff including the area of Splott, in which the site is located. Construction of the flood defences commenced in late 2024, with construction due to be completed by 2027/28. The site therefore remains acceptable against criteria of the TAN.</p>

Drainage

The proposed drainage strategy for the development adopts a sustainable and integrated approach, combining a range of Sustainable Drainage Systems (SuDS) to manage surface in accordance with best practice and policy requirements.

Fig.7 Proposed Drainage Strategy



Surface water runoff from the development, primarily generated from roof areas, will be managed through a network of Rainwater Pipes (RWPs). In several locations, RWPs will discharge directly into rain gardens and landscaped SuDS features designed to slow down, filter, and naturally attenuate rainfall. Elsewhere on the site, a linear drainage channel will collect water from RWPs and direct it towards rain gardens or additional below-ground storage features. These rain gardens serve both a functional and ecological role, promoting natural infiltration, reducing runoff rates, and enhancing local biodiversity and amenity.

To provide sufficient attenuation and manage peak surface water flows, the strategy includes a substantial below-ground cellular storage system, measuring approximately 44m² with a depth of 1.875m. This is supported by a proposed oversized pipe, 600mm in diameter, which offers further capacity to store water during storm events. These features are designed to ensure that surface water discharge from the site is restricted to greenfield runoff rates or better, reducing flood risk downstream.

Surface water will also be conveyed across the site through a series of shallow, ground-level features such as ACO drains, dished channels, and rills, which direct flows towards SuDS components in a controlled manner. In the event of exceedance or overflow, water will discharge into the existing combined sewer network. A key part of the strategy involves connecting to an existing DCWW combined sewer manhole (ref. ST0760301), which will be surveyed to confirm its invert level and condition.

Foul water from the development will be conveyed via a combination of private and adoptable foul sewers. These will collect wastewater from dwellings and direct it towards the existing combined sewer network. The layout and design of the foul drainage system will comply with adoptable standards, ensuring adequate separation, capacity, and long-term functionality.

Overall, the drainage strategy offers a compliant and sustainable solution for managing both surface and foul water on site.

Design and Layout

The design of the proposed development has evolved in direct response to pre-application feedback and is supported by a comprehensive Design and Access Statement and Heritage Impact Assessment. Together, these demonstrate how the scheme responds positively to the character and opportunities of the site, while meeting the principles of placemaking as set out in Planning Policy Wales (Edition 12) and the Cardiff Local Development Plan.

Fig.8 Proposed Layout



Block A: Apartments 4/5 Storey
2P 1B : 39 No.
3P 2B : 13 No.

Total : 52 No.
Three flats at GF omitted for Bins/cycles/meters

Block B: Houses: 2 Storey
5P 3B : 4 No.
Parking : 4 No.

Block C: Common Access Flats 3 Storey
2P 1B : 6 No.

Total 62

- SUDs areas, Meadow Grass, Raingardens
- Amenity Grass
- Tarmac or block paved road
- Footpath
- Existing tree with RPZ. Refer to Tree constraints plan and Tree survey for details
- Proposed tree, see landscape drawing for details
- Native shrubs/bushes within rain garden areas
- 1.8m Close boarded timber fence
- 2m high timber acoustic fence
- 1.1m high hoop top fence
- 1.8m high brick wall
- Existing stone and brick walls, various heights
- Existing levels
- Proposed levels

The proposed scheme will deliver a high-quality, sustainable and inclusive residential development that contributes positively to the urban fabric of Splott. The scheme has been designed to meet or exceed DQR and Lifetime Homes criteria for each unit with a proposal for 62 affordable dwellings, delivered through a mix of apartments and townhouses. The identified mix has been developed in consultation with the RSL and reflects current and projected housing needs in the area.

The surrounding area comprises a mix of architectural forms and scales, including two-storey terraces, light industry and prominent historic buildings such as the five-storey Maltings warehouse opposite the site. This varied urban context provides flexibility in design approach. The proposed scheme responds to this by sensitively positioning the taller apartment block (Block A) on the southwestern corner, facing East Tyndall Street, where it acts as a landmark structure at the interface between commercial and residential areas. The massing strategy has been carefully considered to ensure the scale sits comfortably within its context, with a stepped form that responds to neighbouring development and avoids over-dominance. The inclusion of townhouses (Block B) and a smaller terrace (Block C) towards the rear and edges of the site introduces a gentler transition to surrounding residential areas.

A well-integrated network of private and communal amenity spaces has been incorporated throughout the site, supported by an attractive and ecologically functional landscape strategy. Block A is served by three key amenity areas:

- A 272m² landscaped courtyard to the west
- A 122m² private garden to the south,
- A 265m² communal space to the north of Block C

In total, the scheme provides approximately 660m² of amenity space for 81 residents of Block A, meeting and slightly exceeding the benchmark set by the Residential Design Guidance. Additional landscaped buffers, including rain gardens, contribute to visual amenity, sustainable drainage, and defensible space between buildings and pedestrian routes.

Each two-bedroom apartment benefits from a private balcony or patio, while the townhouses have dedicated front and rear gardens. All parking and communal areas are designed to be overlooked by habitable rooms, ensuring passive surveillance in line with Secured by Design principles.

Sufficient space is provided around all bins to ensure easy access and manoeuvrability for both residents and waste operatives. Each kitchen includes storage for general waste and recycling, supporting a potential weekly bag collection system. For Block B houses, waste and recycling will be stored in rear gardens and moved to the kerbside on collection days, in line with standard practice in Cardiff. Internal storage also meets DQR requirements. For Block C, a secure, dedicated bin store is located within 18m of the site entrance and adjacent to the adoptable access road, with dropped kerb access for ease.

To the western boundary, an acoustic timber fence will be installed to reduce noise from adjacent commercial uses, complemented by soft landscaping and planting to provide further visual and acoustic screening. This zone also includes informal play space, reinforcing the multifunctionality of the green infrastructure on site.

The architectural language of the development is contemporary yet contextual, drawing inspiration from the historic Maltings building opposite the site. Materials include red and buff-toned facing brickwork, used in combination to break down visual massing and articulate the form of the blocks. Dark grey or black-framed windows and doors, together with matching rainwater goods and Juliet balconies, reflect the industrial character of the area. Variation in façade treatment between the apartments and townhouses helps to visually distinguish between building typologies, while the use of colour and detailing across the townhouses reinforces their rhythm as individual homes. The overall palette and detailing aim to deliver a coherent visual identity, appropriate to both the evolving residential character of the area and the site's context.

Fig.9 3D Renders of Proposal





In conclusion, the proposed development demonstrates a clear and positive response to the relevant design policies of the Cardiff Local Development Plan (LDP), particularly Policies KP5 (Good Quality and Sustainable Design), KP4 (Masterplanning), and H6 (Change of Use of Redundant Land or Buildings). The scheme has been sensitively designed to respond to its urban context, delivering a well-integrated, high-quality residential environment that respects the area's character while maximising the site's potential. The layout, scale, and architectural treatment reflect placemaking principles and ensure that the development will contribute to the creation of a vibrant, safe, and sustainable neighbourhood in line with the LDP's overarching vision.

Heritage

Development relating to any heritage assets listed within Policy EN9 will only be permitted where it can be demonstrated that it preserves or enhances that asset's architectural quality, historic and cultural significance, character, integrity and/or setting. The Historic Environment Wales Act 2023 furthermore states that Welsh Ministers or a local planning authority in Wales must have special regard to the desirability of preserving: (a) the listed building, (b) the setting of the building, or (c) any features of special architectural or historic interest the building possesses'.

The application site lies to the immediate south of a Grade II Listed Building, formerly known as East Moors Forward Movement Mission Hall (now Eastmoors Youth Centre), designated on 13 April 2022 as being a rare surviving example of a Forward Movement Mission Hall. It survives largely intact and retains its original hall and layout. In addition, the Grade II Listed Building known as The Maltings lies to the south of the site, separated by East Tyndall Street, designated on 19 May 1975 as one of the best examples of maltings in Wales, retaining its industrial character in its conversion.

The Design and Access Statement has been prepared with a comprehensive addendum Heritage Assessment which exemplifies the design rationale of the proposal and its sympathetic response to local assets. Overall, the proposed scheme responds to the local character, referencing the adjacent residential properties and Listed Buildings to ensure that the overall site has a legible architectural character, which is easy to navigate and creates a sense of community and enclosure. The redundant form of the existing site, which has little architectural or landscape merit presents a valuable opportunity for betterment in this regard.

Noise	<p>In accordance with Policy EN16, which seeks to prevent unacceptable harm to health, local amenity, and environmental quality due to air, noise, or light pollution, a Noise Assessment has been undertaken to support this application.</p> <p>The assessment provides a comprehensive assessment of the existing ambient and operational noise environment. This includes:</p> <ul style="list-style-type: none"> • Measurement of existing noise levels from operations within the trading estate and surrounding commercial premises, including any intermittent noise from the Eastmoors Youth Centre; • Evaluation of the likely impact of these noise sources on the proposed residential units and their associated external amenity areas; • Recommendations for mitigation to ensure that internal and external noise levels remain within acceptable limits defined by relevant national and local guidance. <p>To ensure that the development does not result in adverse impacts on the health or amenity of future occupiers, the proposed scheme incorporates the following mitigation measures:</p> <ul style="list-style-type: none"> • Enhanced glazing specifications have been integrated into the building design to provide sufficient acoustic insulation and ensure a high standard of internal acoustic comfort; • Mechanical ventilation and cooling systems will be installed, enabling windows to remain closed if necessary, without compromising thermal comfort or air quality; • Provision of an acoustic timber fence to reduce noise from adjacent commercial uses, complemented by soft landscaping and planting to provide further visual and acoustic screening. • Acoustic design considerations have been embedded in the site layout and internal arrangements, optimising the orientation and positioning of sensitive rooms away from the primary sources of external noise. <p>Through the implementation of these measures, the proposal ensures that noise impacts are appropriately mitigated and that the amenity of future residents is safeguarded. The scheme therefore complies with the requirements of Policy EN16 and delivers a high standard of residential environment while respecting the operational characteristics of the existing surrounding uses.</p>
Air Quality	<p>The proposed development is not situated within an Air Quality Management Area (AQMA), nor has a specific air quality assessment been requested by the Local Authority as part of the pre-application process. Consequently, it is not anticipated that the development will result in any significant adverse effects on air quality that would necessitate further investigation or mitigation within the application process.</p>
Conclusions	
	<p>The principle of the residential redevelopment of the site has been evidenced to be in compliance with key development plan policies. There is no over-riding need to retain the former use as evidenced, and the scheme will deliver a significant benefit in helping meet affordable housing need in the ward. This, together with the scheme's compliance with the identified technical criteria, mean that the scheme accords with the requirements of LDP Policies EC1, EC3, H6 and H3.</p> <p>With regard to considerations of transport and movement, the Site is in a highly sustainable location with a wide range of services and facilities in the locality. The development would maximise opportunities for sustainable travel aligning with aspirations of both Local and National Policy frameworks.</p> <p>The development would comply with other technical policy requirements, including in respect of trees, ecology, flood risk, drainage, design, noise, and air quality.</p>

	<p>It is therefore concluded that the proposed development would be in compliance with the development plan and consequently should be supported.</p>
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