



1722:PAC:DAS

Design & Access Statement

for

Residential Development

of

East Tyndall Street Cardiff



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1.0 Vision & Introduction

Cardiff Community Housing Association (CCHA) a Registered Social Landlord, in conjunction with Yourspace Projects Ltd (YSP) have secured an option to purchase a vacant commercial site in East Tyndall Street Cardiff, formerly occupied by Magnet Ltd.

Magnet vacated the site in early 2024, but had been marketed by Knight Frank since 2020, with no serious interest. A letter from Knight Frank included with the pre application submission provides a history of marketing activity and suggests that the probability of securing a commercial or Employment use for the site is limited.

CCHA have recognised that the plot represents an opportunity to provide affordable housing which will alleviate the unprecedented demand for homes in this area of Cardiff and have partnered with YSP to develop proposals for a residential scheme on the plot.

A design brief was prepared which suggested a mix of apartments, walk up units and houses would be appropriate for the site.

KJG Architects have been appointed by CCHA/YSP to develop a design and submit for Planning Consent for the proposed scheme.

Initial Pre application advice has been obtained from Cardiff City Council (PA/24/00133), which establishes that the principle of Development is acceptable and identifies the key considerations for any future planning application. Further information is included in the Consultation section later in this document

This document has been prepared to support the initial request for Pre application advice. It is intended that the document will be developed following any advice and will be submitted in support of any future planning application.

Client's Design Brief

CCHA have prepared a detailed design brief, *N128 Magnet - Project Brief*, a copy of which is included in the application.

Extracts from the document are included here for reference:

General Principles

The aim for the scheme is to create a safe and secure environment in which residents can live and grow. The Association are committed to delivering sustainable, affordable homes and require all new homes to be built to EPC A/SAP 92.

Designing out unnecessary service charges is to be a focus to create a truly affordable scheme.

Due to the stringent requirements of the forthcoming Building Safety Act, it is desired that this building is designed so that it falls outside of the 'High Risk Building' classification. This will see the building sit under 18 metres in height and no more than 6 storeys.

Design requirements include:

- Effective use of solar PV.
- EV charging infrastructure
- Gas will not feature in the scheme
- Good ventilation systems to be incorporated.
- Creating a space that can be used flexibly as a home office.
- General storage is to be usable and any stored equipment within storage cupboards must be accessible and provide for easy maintenance.
- One bedroom properties within the ground floor to have facilities to accommodate residents who may suffer from physical limitations. Level access showers and wider doorways with level thresholds form part of this requirement.
- Designs should meet Lifetime Homes to allow flexible layouts that can be easily adapted to suit the needs of the resident.
- Landscaping is to be designed as low maintenance and to benefit everyone. The soft and hard landscaping will be critical to the site.
- Refuse storage both inside the property and external is to enable and promote recycling.
- Schemes should meet the requirements of Secured by Design Gold.
- Schemes should be assessed for the risk of overheating in accordance with CIBSE TM59.
- Construction methodology should seek to utilise Welsh Timber and Welsh Government approved MMC solutions.
- Seek opportunities to reduce upfront and embodied carbon and the incorporation of carbon storage throughout the construction phase. This would be monitored via the carbon toolkit.

Mix

Following consultation with Cardiff Council Housing Strategy team, the proposed mix is suggested as a requirement in this locality.

- 60% 1B2P Apartments
- 30% 2B3P Apartments
- 10% 3B5P Houses

The design team are encouraged to explore opportunities that maximise construction efficiencies but also consider the lifetime costs to the end user and the Association.

SWOT

Acoustic

The site is located on a busy arterial route into the centre of Cardiff which is bordered by industrial units as well as residential usages. Please consider the suggestions made by the project acoustician and how this impacts the successful enjoyment of amenity space.

Consideration must also be given to ensure that ventilation systems such as MVHR can be accommodated efficiently without hindering performance or future maintenance requirements.

Transport

Due to the sustainable location of the site, it is our intention to ensure that active travel is promoted by the effective provision of bicycle storage. The location of the bike storage should provide confidence to the residents that if stored in this location, the bicycle will be secure. Ease of access should also be considered to encourage usage of the bicycle store.

Houses should have a designated parking space according to SPG. However, no parking provision is required for the apartment blocks.

Flood Risk

As the Cardiff flood defence programme of works is due to complete in 2026, this site will no longer be deemed as a flood risk. However, the comments made by the project flood risk consultant should be considered and implemented where required.

Amenity and landscape

The landscape should integrate any proposed SuDS features to ensure they enhance the amenity space. There should be an obvious biodiversity net gain within the proposed design.

Placemaking

This area of Cardiff was previously heavily involved in the production and transportation of industrial products. Remnants of this history remains, and some iconic buildings are located nearby. The Maltings building is a prominent historic building that has strong architectural features. The proposed design is encouraged to compliment this building, utilising materials evident within the surrounding vernacular.

Application Description

A scheme has been prepared and a Full Planning Application will be submitted following completion of formal Pre Application Consultation (PAC). This document has been prepared in support of this application as required by the Town & Country Planning (Development Management Procedure) Order 2009.

The document is set out in accordance with guidance from TAN 12: Design (appendix A1), Design Commission for Wales guidance 'Design and Access Statements in Wales: Why, What and How' and Cardiff City Council's published guidance documents. It describes the Proposal and sets out the design process that has resulted in the proposed development.

The nature and scope of the Proposal is clearly set out on the following drawings and documents which will be included in the Planning applications:

Drawing Title	Drawing reference
1722PAC-01	Location Plan (A3)
1722PAC -02	Site Analysis Plan (A3)
1722PAC -03	Existing Site Plan(A3)
1722PAC -04	Existing elevations/site sections (A3)
1722PAC -05	Proposed Site Plan (A3)
1722PAC -06	Proposed Block A Plans 1 (A3)
1722PAC -07	Proposed Block A Plans 2 (A3)
1722PAC -08	Proposed Block A Plans 3 (A3)
1722PAC -09	Proposed Block A Elevations (A3)
11722PAC -10	Proposed Floor Plans Blocks B & C (A3)
1722PCA -11	Proposed Block B & C Elevations (A3)
1722PAC -12	Proposed Context Site Plan (A3)
1722PAC -13	Proposed Site Sections (A3)
1722PAC -14	Proposed Context Elevations (A3)
1722PAC -15	Proposed 3D Views (A3)
1722PAC -DAS	Design & Access Statement
1246_SK02 Green Infrastructure Strategy	Green Infrastructure Statement
1246_SK01_Rev A_Landscape Strategy	Draft Landscaping layout

In addition to the above drawings and documents showing the proposed design the following documents are provided to support the application:

Document	Type/Provided by
N128 Magnet - Project Brief	Client Design Brief
IOW-JBAU-XX-XX-FN-Z-0001-S3-P03-FCA_update_290922	Flood Note: JBA
Bat Friendly Method Statement V2.0	Ecological Services Ltd
Bat Survey Magnet Cardiff Interstrand V3-0	Bat Survey: Ecological Service Ltd
Marketing evidence	Knight Frank
REP01 Noise Impact Assessment	Format Acoustics
Utilities Report Standard Service(20wd)	Utilities survey

The proposal is for a total of 62 affordable housing units within a 4/5 storey apartment block (52 units), a separate 3 storey apartment block (6 units) and a row of 4, two storey 5 person 3 bed houses.

Further details on the mix of unit types and their disposition is included in Section 3: Design Analysis, of this document.

The various blocks are spaced around an area of shared amenity space which is landscaped to provide a high quality setting for residents.

Limited parking has been provided given the sustainable nature of the site location and its proximity to the Central parking Zone. Further details are provided in the Site Analysis section below.

At this stage, all proposals are draft and are subject to revision following receipt of pre application advice from the planners and will be updated accordingly to support any full planning application.

Existing Use

The site is currently vacant following the departure of Magnet Trade Counters who occupied the site until early 2024.

Full details of their tenure along with evidence of site being marketed for continuing employment use is contained in a letter/report from Knight Frank which is included as part of this application.

The report has concluded that future use for employment is unlikely given the limitations of the building and current market conditions.

Further details on the Planning Policy position is provided in Section 4 of this document.

Previous Planning History

Other than a Change of use from industrial premises (B2) to two separate units, trade warehouse (B8) and offices (B1) and ancillary parking in 2005, there have not been any significant planning applications for the site.

The previous owners obtained Pre Application advice in 2022 (Ref: PA/22/00069/MJR) for 48 apartments and 8 houses. The advice received, initially informed a submission for formal pre application advice for the current proposals (PA/24/00133).

Formal pre application advice was received in May 2025, and resulted in a change to the proposed scheme in housing mix, layout and massing. The advice received and the subsequent design development is discussed in more detail in the Site Analysis and Planning Sections of this document.

2.0 Site and Context Analysis

A full understanding of a development site is a crucial part of the design process. To facilitate this understanding a full site and context analysis has been carried out. The analysis as set out below has been based on guidance provided in the Welsh Government publication “*Site & Context Analysis Guide: Capturing the value of a site*”.

This document sets out 4 main headings to guide the Site and Context Analysis:

- Culture & Community
- Landscape
- Movement & Infrastructure
- Built Form

These sections are included below with diagrams and photographs as appropriate to further enhance the site analysis and identify the Strengths, Weaknesses, Opportunities and Threats presented by the site.

To assist in the evaluation of the site a Site Context Analysis drawing (1722:PA 02) has been prepared. This is included in the submission and is reproduced below for reference.



“Design which is inappropriate in its context, or which fails to grasp opportunities to enhance the character, quality and function of an area, should not be accepted, as these have detrimental effects on existing communities.”

TAN 12: Design, Welsh Government, para 2.6

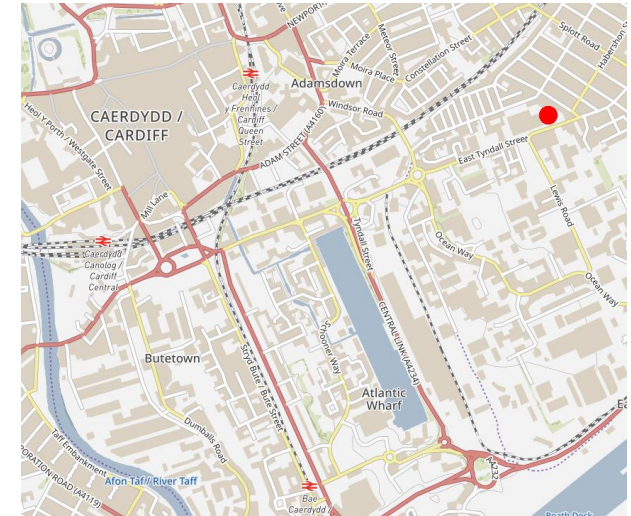
Culture and Community

Site Location

The site location is shown on the drawing 1722PAC-01 and the following maps and aerial photograph and is to the East of Cardiff City Centre.

The full site address is:
Former Magnet Trade
East Tyndall Street
Splott
Cardiff
CF24 5DA

The application site is at the eastern end of East Tyndall Street on the edge of a commercial/business park. The site is well connected to the road network and public transport options.



Above:
Location
map
showing the
site, Cardiff
City Centre
is approx.
1.4Km to the
West
Below:
Aerial view
of the site
(marked in
red).



Splott is an inner city area of South Cardiff. It is a mature residential area with a range of public and commercial uses within its boundaries. The southern part of the area is predominantly commercial and industrial in nature. The application site sits on the border between the two areas.

The area includes a number of Schools and other community facilities and has a well-established community and good links to the rest of Cardiff.

The site is well located to provide plenty of opportunity for employment within reasonable walking and cycling distance. The easy access to public transport and major road links increases the availability of employment to a regional level with limited detriment to the environment.

Planning Context

The Pre application advice (PA/24/00133) obtained in May 2025 sets out the main planning policies that would be relevant to the site. These are discussed in more detail in the Planning/Consultation section of this document.

A summary of the main areas of Policy that would influence the site analysis and impact on any proposed design are set out below:

Principle of Development

The pre advice concluded that the case for loss of employment had been made and as such the principle of development could be supported, subject to a financial contribution to mitigate the loss of this site to an alternative use in accordance with Policy KP7 (Planning Obligations).

Placemaking: Impact on local Character

The scale and density of the development was identified as being a key consideration in any future proposals and in particular the impact on adjacent residents amenity.

The submitted scheme seeks to address these issues as set out in Section 3.0 Design Analysis and Section 4.0 Consultation of this document.

Impact on Heritage Assets

The relationship with nearby buildings, particularly the Listed buildings to the North and South of the site was a factor identified in the recent pre application advice.

The Listed buildings are:

- Former Mission Hall, Listing 87863 located immediately to the North of the site,
- The Maltings, Listing 13749, located opposite the site on East Tyndall Street,

The map opposite, which is an extract from the Wales Data Map, shows the Listed Buildings and their relationship to the site (site in red and Listed Buildings in Green).

A Heritage Impact Assessment, or assessment of the setting in relation to Listed Buildings is included in Section 3.0 Design Analysis of this document.

Impact on Residential Amenity

There are existing residential premises in close proximity to the Eastern boundary of the site. Overlooking distances and possibility of overbearing character were identified as key design factors. The overlooking distances and related constraints are considered later in the Site Analysis and the Design Analysis sections.

Future Occupiers

Potential lack of amenity space for future occupiers is identified as a potential concern. This could be addressed by the introduction of balconies to 2 bedroom apartments and the creation of some dedicated and secure communal amenity space, especially around Block A.

The potential outlook of apartments over adjacent industrial/commercial operations was also raised as a concern which would need to be addressed in any developed design.

Pollution and Contamination

The advice required that potential pollution impacts on future residents be assessed in any revised proposals along with any contamination present at the site. These matters have been addressed in the revised application as set out in this document.

Highways and Sustainability

It is recognised that the site is in an inherently sustainable location allowing for a reduction in car parking on site. This needs to be mitigated by suitable active travel connections and the inclusion of suitable secure cycle parking on site.

Landscaping and Ecology

Tree surveys and an Ecological Assessment would be required to support an application and inform a Green Infrastructure Strategy. These have been provided with the application.



Surrounding land & Buildings Use

The site sits on a border between predominantly residential areas to the North and East and Commercial use to the South and West as can be seen on the extract from the Site Analysis drawing below:



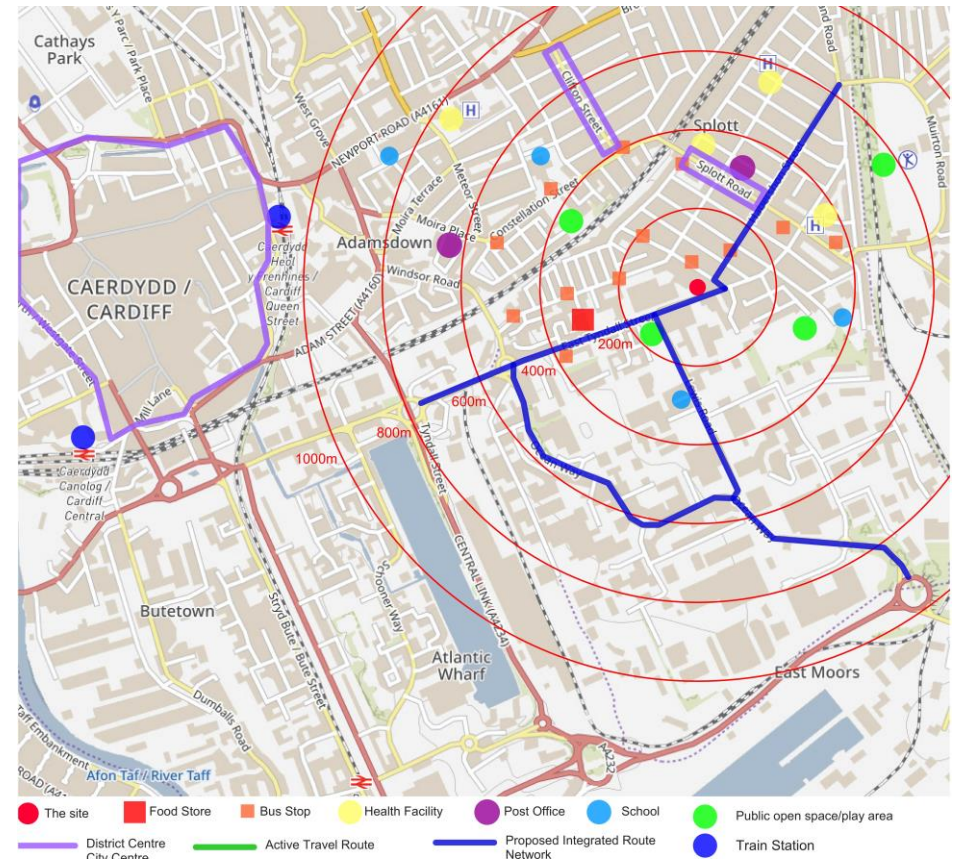
The commercial areas are part of the Ocean Park Employment Area (EC1.1) under the adopted LDP. This includes a range of industrial, commercial, retail and office uses.

The site has easy access to areas of Employment in the immediate vicinity, including retail and commercial as well as being close to the City Centre which offers an even wider range of employment opportunities.

Neighbourhood Structure

There is a well-established neighbourhood Structure in Splott generally as it is a mature area of Cardiff City Centre. The site offers easy pedestrian access to a range of local amenities for potential residents. East Tyndall Street is a main arterial road that connects Splott to the city centre

An overview of local facilities and amenities, along with transport connections are shown on the extract from the Site Analysis drawing (1722PA:02) below:



There are English and Welsh medium primary Schools within 420m of the site, with Ysgol Glan Morfa less than a 350m walk.

The new Willows High School, currently in development, will also be located on Lewis Road within 500m of the site entrance.

Cardiff City Centre is within 1.3Km to the West of the site via level and safe pavements and provides a range of retail types as well as employment opportunities. There is also a Local Centre on Splott Road approx. 300m to the East along safe flat footpaths. Clifton Street District Centre is also with an 800m level walk.

A Lidl supermarket is located on East Tyndall Street less than 320m from the site.

There are areas of public open space reasonably close to the site including Maltings Park on the corner of East Tyndall Street and Lewis Street, which is within 120m. Moorlands Park is 350m to the SE along flat pavements. There are also a number of commercial leisure facilities in the vicinity including children play areas, gyms and fitness centres.

Maltings Park, the closest area of Public Open Space was opened in 2023 and provides a wide range of community facilities including, formal and informal play areas, a skate park and a Multi-Use Games Area (MUGA).



As the site is within an existing residential area, with good access to facilities it is not considered that the proposed development will have any negative effect on the surrounding neighbourhood and can only enhance the area.

Residential use of the site is therefore entirely compatible with the existing neighbourhood structure which is a highly sustainable location with good access to facilities and potential employment opportunities in the local and wider areas.

Consultation & Engagement

A submission is being made for Pre Application Planning advice. Once received this document will be updated to reflect and advice received.

Socio Economic and Market Analysis

The site is ideally located within an existing residential community and close to a wide range of facilities and opportunities for employment.

The site has been identified by the Housing Association as being an ideal location to provide high quality affordable housing within the area. There is an identified need for such housing, particularly in areas with such good links and access to employment opportunities.

It is understood that the site has been recognised by the Local Authority as a suitable Housing site and is supported by the Housing Delivery Management team.

Given the local demographics it is felt that affordable housing is an appropriate development for the site. It is not anticipated that the proposal would have any adverse effect on the local community. Indeed, the provision of additional housing on such a sustainable site would bring significant benefits.

The potential site value has been assessed along with the anticipated value of completed units and it has been established that a minimum of sixty units are required to make the site viable.

Whilst private housing has been considered it is not anticipated that the potential values or demand would justify such a development.

Culture & Community Summary	
SWOT	<ul style="list-style-type: none">• The site is available and deliverable,• The site is immediately adjacent to residential location in an area with an identified need for affordable housing,• The location is highly sustainable in transport terms and located close to the City Centre, a District Centre and a range of local amenities,• There are employment opportunities with reasonable walking distance of the site.• The site is currently designated for Employment and justification will be needed for change of use to residential.
Design Considerations	<ul style="list-style-type: none">• To ensure the refurbishment provides high quality accommodation that meets DQR Standards,• To provide a suitable mix of house/apartment sizes to meet CCHA's stated requirements whilst providing a high quality environment for residents that adheres to Placemaking principles.

Landscape

Topography

The site is currently predominantly occupied by an existing building, which will be demolished leaving a flat area for construction. The existing service yard is relatively flat as can be seen on the submitted existing site plan (1722PA-03).

The topography of the site is ideal for the proposed development and does not place any constraints on the design solution.

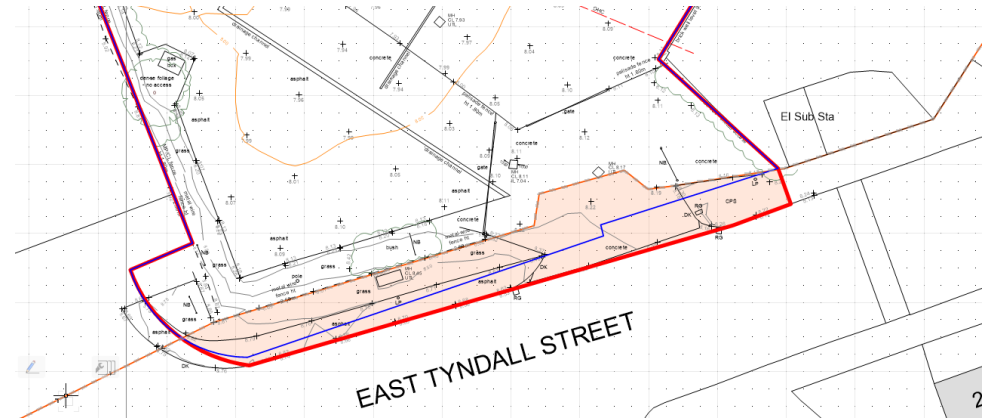


Access Points

The site is accessible by car, cycle and foot via East Tyndall Street, which connects directly to the A4234, Central Link Road, which gives access to the City Centre and the wider regional road network.

There is an existing crossover into the site, which can be utilised, or adapted to suit any proposed design.

The existing site boundary (legal title) extends onto land which forms part of the adopted highway as shown on the existing site plan and the extract below:



The site ownership is shown in blue and the extent of the adopted highway within the proposed red line (planning) boundary) is shown in orange. It is likely that a 2m footpath will need to be retained across the front of the site. A stopping up order will be needed for the remainder of the adopted highway that lies within the proposed site.

This appears to have been accepted by the Highways Officer in previous pre application advice.

Given the number of housing units required to make the site viable it is likely that any internal road within the site will need to be to adoptable standards and suitable vision splay will be required at the access onto East Tyndall Street. The extent of the vision splay will be dictated by the speed of traffic. It is noted that there are speed control measures for traffic approaching from the East.

The speed limit changes from 20mph (to the East) to 30mph immediately outside the site.

Boundaries

The building itself entirely occupies the northern part of the site and it appears that to the North and East the building's walls actually form the site boundary, although this is not fully clear without further investigation. Drone photographs of the site showing the various boundaries are included on the following page.

The northern boundary to the Listed Mission Hall on Sanquar St. appears to be a combination of an original stone wall with a high brick wall on top that forms the rear wall of the existing building. However, it may be that the building has an independent rear wall that is separate from the boundary wall. Further investigation is needed.

The Eastern boundary is again formed by a tall brick and/or stone wall between the existing building and the rear gardens of the houses on Ordell Street at the northern end of the site. Again, this may be part of the existing building.

This wall continues in the southern end of the site where it is a standard stone garden wall separating the site from the gardens beyond. Along this boundary the houses have rear windows approx. 9-11m from the site boundary meaning an area of approx. 10m of the eastern part of the site cannot contain habitable room windows to avoid creating an overlooking issue. This is shown on the site constraints/analysis drawing (1722PAC-02).

The Southern boundary is partly formed by a low brick wall and hedge separating the site from the 3 storey apartment building which is owned by CCHA. This block has some windows on the north facing elevation that will need to be respected in terms of overlooking.

The remainder of the Southern boundary is defined by fences and gates on the rear of the pavement to East Tyndall Street. Part of the site along this boundary is actually adopted highway as described previously.

The Eastern boundary is generally defined by a palisade fence separating the site from the service yard to the adjacent Howdens trade counter. This boundary has some shrubs/hedgerow at the southern end, although it is unclear which side of the boundary these are rooted.

To the northern part of the eastern boundary the existing building is close to the boundary limiting the space for any landscaped areas.

The site boundaries are generally well defined and do not present any specific impediments to any proposed design other than the need to respect the rear windows of the adjacent houses.

Site Boundaries:

Clockwise from top left:

The Southern and Eastern boundaries with adjacent residential properties.

The site viewed from the South showing the relationship with surrounding buildings.

The site viewed from the East showing the existing brick wall to the adjacent gardens.

The site from the North showing the boundary with the listed building on Sanquhar Street and the fence boundary to the adjacent commercial units.

The rear elevations and windows of the houses on Ordell Street are also visible.



Ecology

The site is almost entirely made up of the existing building and a concrete and tarmac service yard.

There is some limited hedgerow and shrubs to the eastern boundary which straddle the boundary. These do not appear to be native hedgerows and do not have any particular ecological significance.

There are also some hedges and small trees on the southern boundary but these are generally rooted off site and will not be affected by any proposed development.

At this stage, a detailed tree survey has not been carried out but if required can be arranged prior to a formal planning application.

Given the lack of ecological features, a Preliminary Ecological Assessment (PEA) has not been carried out.

An initial Bat Survey has been carried out by Ecological Services Ltd.) which has identified that the existing building has 'moderate' potential for bats. However, internal and external inspections along with 2 emergence surveys did not note any evidence of bats.

Given the above the existing building and site can be classified as having limited to No Biodiversity.

An opportunity exists to significantly increase the biodiversity of the site by careful and considered landscaping.

It is intended that a Green Infrastructure Statement will be provided with any formal planning application describing how a net increase in Biodiversity can be achieved.

Blue & Green Infrastructure

The site has no blue or green infrastructure and consists entirely of hard surfaces other than the limited greenery at the southern and eastern boundaries.

There are no significant areas of green infrastructure in the immediate vicinity of the site and there is no connectivity to any such infrastructure (see aerial view opposite).

There are a number of well landscaped private gardens in the area but these are generally landlocked and disconnected from any wider green infrastructure.

There are some areas of public space with landscaping and trees but these are also unconnected to each other or any wider connections.

There is no scope for providing any further or new green connectivity.

There is no blue infrastructure on the site or within the local area.

Blue and Green Infrastructure are neither a constraint nor an opportunity for any proposed development.



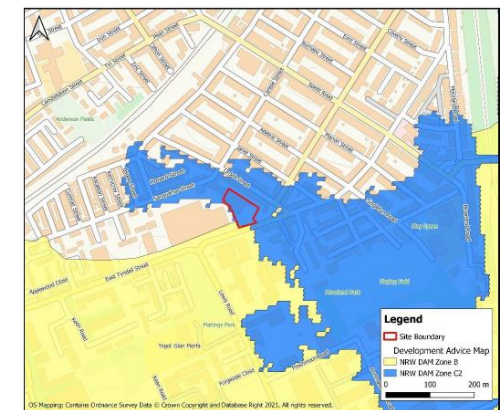
Flooding:

The site is located within Flood Zone C2 of the current Development Advice Map (DAM).

The site is defined as within the TAN15 defended Zone in the new Flood Map for Planning.

In both cases vulnerable development can be considered subject to the justification test and on previously developed land.

A formal Flood Consequence Assessment has been prepared to support the application to demonstrate



that the proposals are compliant with TAN15, the site will not require raising and are not likely to cause a change in flood risk to areas outside of the site boundary (third party detriment).

Flooding is therefore not a constraint on any proposed development.

Contamination

The Pre Application Advice has suggested that, based on previous Land use, a Contamination Assessment of the site may be required to support any Planning Application, this has been included in the current application.

Specific Site Constraints

There are very few specific site constraints that would impact on any proposed development.

The constraints that do exist are limited to:

- Avoiding any overlooking to the eastern and part southern boundaries,
- Respecting the setting and character of the nearby Listed Buildings,
- Rationalising the adopted highway along the southern boundary.

Landscape Summary	
SWOT	<ul style="list-style-type: none">• The site is level with no constraints on potential layouts,• There is easy pedestrian and vehicular access from East Tyndall Street.• There are no significant ecological features or areas of Blue of Green infrastructure that impact on any design proposals.• There is an opportunity to significantly enhance the biodiversity of the site,• The rear of the adjacent houses on Ordell Street will need to be respected in terms of overlooking distances.• Potential for Contamination of the site by previous use
Design Considerations	<ul style="list-style-type: none">• The landscaping and topography of the site do not present any significant issues for a proposed design other than the need to respect overlooking distances.• A Contamination Assessment will be required as part of any future Planning Application.

Microclimate

General assessment

There are no significant on, or off site, features that would have a significant detrimental effect on the site or any proposed development. The area is currently a mix of commercial and residential and no issues have been identified by previous occupants.

Given the site is accessible on all sides and there are limited overlooking windows or obstacles to development there are no restrictions on the orientation of any proposed dwellings. Although East West would be the ideal orientation, this may not be possible if the site density is to be maximised. However, the lack of site constraints will ensure that no dwellings will be single aspect North facing.

There are no significant tall buildings in the vicinity of the site that could create wind tunnels or overly shade the site.

There are no significant trees on or adjacent to the site that would create areas of shade or restrict the layout.

Acoustic Environment

The pre application advice suggests that noise from the adjacent commercial premises may be an issue. As such a Noise Impact Assessment has been undertaken by Format Ltd.

Their report, which is included with this submission, does not identify any significant issues that cannot be mitigated by suitable design. The site is defined as Noise Exposure Category B in TAN11 meaning that “Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection.”

A solid wall/timber fence is to be provided between the site and the Howdens service yard and suitable glazing is required to any elevations facing this yard and/or East Tyndall Street.

It is not believed that noise presents any significant risk to the development nor has any impact on potential layouts that cannot be adequately managed by considered design solutions.

Air Quality

The site is not in an area having an identified air quality issue. Air quality was not raised as an issue during the previous pre application advice.

Given that the proposed development will probably include very limited parking it is likely that the trip generation will be less than the previous use thus giving a potential improvement to local air quality.

Air quality is not a material consideration in the design of the proposed refurbishment.

Microclimate Summary

SWOT	<ul style="list-style-type: none"> There are no issues of microclimate that pose any threats to the proposed development,
Design Considerations	<ul style="list-style-type: none"> To provide a solid boundary treatment to the service yard to the adjacent Howdens unit. To ensure that any proposed method of construction can provide suitable internal ambient noise levels, To ensure that layouts are arranged to enable maximum use of solar PV panels to improve the energy efficiency of the dwellings.

Movement & Infrastructure

Road Hierarchy & Access

The site is in a sustainable location and is easily accessible by all modes of transport.

The site is accessed from East Tyndal Street which connects directly with the A4234, Central Link Road to the West, which gives access to the City Centre and the wider regional road network via the A4234 Cardiff Link Road. The A4232 connects to the M4 and A48 to the East and West of Cardiff.

On a local level the site is well connected to the Local Centre on Splott Road and the District Centre on Clifton Street via Walker Road.

Although it is envisaged that there will be limited parking provided on site, the location is easily accessible by car from all directions.

The site is within the Central Parking Area and as such the maximum level of parking that can be provided is one space per unit, although Welsh Government Planning Policy (PPW) encourages lower levels of parking to reduce the reliance on the private car.

Pedestrian Access

The site is fully accessible by pedestrians via adopted footpaths along East Tyndall Street which connect the site to the wider footpath network within the local area and the city generally.

Given the reasonably good pedestrian links there are no additional proposals necessary to increase accessibility for pedestrians other than the ongoing promotion

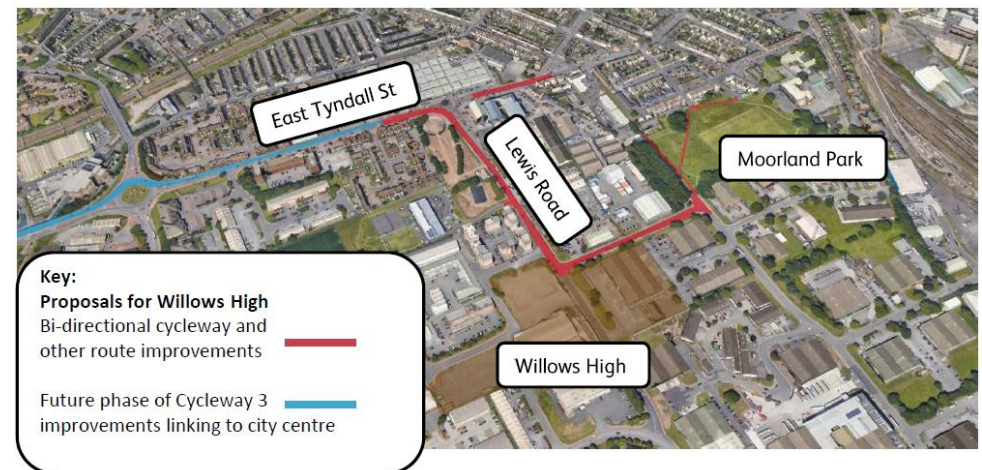
of walking as an environmentally friendly and healthy alternative to the private car. A Travel Plan will be prepared to assist the HA in their aim of reducing car usage.

There are many employment opportunities in the City Centre and the area generally, all within easy walking distance or accessible by public transport.

A wide range of local amenities are available within a short walking distance along with many options for Public Transport as set out in the Neighbourhood Structure section of this document.

In addition, Cardiff City Council are proposing significant upgrades to the Active Travel infrastructure in the area to improve access and safety around Willows High School.

These proposals include improvements to the pavement immediately outside the site (East Tyndall St) and pedestrian and cycling infrastructure upgrades in the vicinity of the site as shown on the extract from a presentation document prepared by the Council.



Further details of the proposals can be found at the following link:

[https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-projects/Consultations/willows-high/Documents/Lewis%20Road%20\(near%20Willows%20High\).pdf](https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-projects/Consultations/willows-high/Documents/Lewis%20Road%20(near%20Willows%20High).pdf)

Cycling Infrastructure

The site is easily accessible by cycle via the main road network. There are dedicated traffic cycle tracks within a short distance of the site. These connect to the wider cycle

path network within and around Cardiff. The site is in ideal location for accessibility by cycle and cycle storage will be a key aspect of any proposed design.

Public Transport

Given the site’s proximity to the City Centre there are a large number of local amenities in the immediate area including food shops, banks, post offices etc.

There are also a number of Public Transport connections within a very short distance of the site including bus stops to the East and West and a main line train station only a 1.6Km walk to the West.

There are a number of bus stops within a short distance of the site as shown on the image opposite (bus stops orange circles).

The closest stop is less than 100m away on Ordell Street. This stop gives access to the City Circle and 1A Services. The stop on Lewis Street, which is approx. 110m away gives access to the 1A, 2A and 3A Services at reasonable frequency.

These stops give access to range of bus routes to Cardiff City Centre and the wider public transport network.

The combination of bus stops and available routes/services provides a good frequency.

The site also within a 1.2km walk to Cardiff Queen St train station which gives access to Cardiff Central Station and a number of Valley lines and the forthcoming Cardiff Metro system.

All of these public transport facilities are well within recognised walking distances as set out in national guidance documents.

The Chartered Institute of Highways and Transportation (CIHT) guidelines ‘Providing for Journeys on Foot’ indicate that the desirable walking distance for commuting and school journeys is 500m, the acceptable walking distance is 1km, and 2km is the preferred maximum.



The guidelines also indicate that walking trips for other purposes have a desirable walking distance of 400m, acceptable distance of 800m and the preferred maximum of 1.2km.

CHIT Table 3.2: Suggested Acceptable Walking Distance.

	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

Utilities & Infrastructure

As the site is an existing building in an urban location all required utilities are available and have sufficient capacity to serve the proposed development.

A report on utilities has been prepared and is included with this submission (Utilities Report Standard Service(20wd)).

This shows that all services are available in close proximity to the site. It also shows that there are no statutory services or easements crossing the site that would impact on any proposed design.

Utilities and Infrastructure are neither a weakness nor threat to any proposed development.

Movement & Infrastructure Summary	
SWOT	<ul style="list-style-type: none">The location is highly sustainable in transport terms and located close to the City Centre, a District Centre, a Local Centre and a range of local amenities and Public Transport connections
Design Considerations	<ul style="list-style-type: none">To ensure cycling and walking are viable options for residents.To provide suitable safe and secure cycle parking to encourage cycling as an alternative to the private car.

Built Form

Urban Form

The site is on the South Western edge of an established residential area (Splott) which predominantly consists of 2 storey terraced housing with frontages on pavement as per the photo below which shows a typical street in the Splott area. Note that the façade treatments are not uniform and have been altered over the years with a variety of finishes:



To the South and West of the site the urban form becomes much more commercial with a range of industrial, commercial, retail and office uses within the Ocean Park Business area. The site sits at the boundary of these two distinct areas and is well connected to both.

The photo below shows East Tyndall Street looking West. The Listed Maltings building is on the left.



There are pockets of residential use among the mainly commercial areas as can be seen in the extract from the Site Analysis plan included on page 6 of this document.

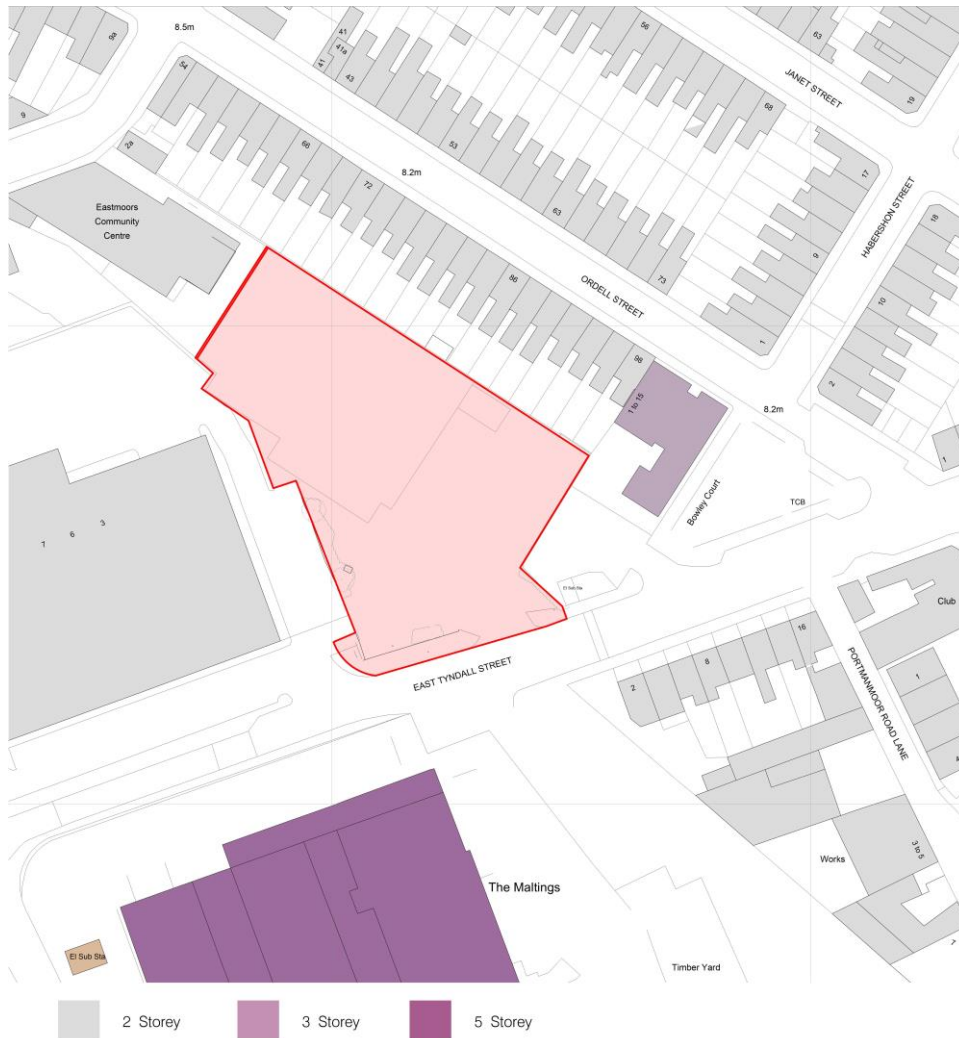
Building Scale, Heights and Density

The building heights and density vary considerably in and around the site. These range from tightly packed but low rise housing to taller apartment buildings and from single storey industrial units to 5 storey Victorian warehouses (Maltings Building).

The plan opposite shows the building heights in the immediate vicinity of the site.

Given the varying building heights in the area and the site's location between distinct urban forms building height is not felt to be a significant design constraint. The site is capable of accommodating a taller building without a detrimental impact on the visual amenity of the area.

Indeed, a taller building to compliment the Maltings building could provide a visual gateway between the residential and commercial areas and would serve as a marker building to clearly identify the start and finish of the residential or industrial areas.



Existing Building and site

The existing building is approx. 1,800m² (GEA) in footprint and is single storey. It has an eaves height of approx. 6.3m and roof that consists of a series of northlights.

The external walls are clad with metal composite cladding where exposed but a number of walls are hidden by original stone and brick site walls. The building is in generally poor condition and will be demolished as part of the development.

Strengths Weaknesses Opportunities and Threats

Strengths

- The site is available and deliverable,
- The site adjacent to a residential location in an area with an identified need for affordable housing,
- The location is highly sustainable in transport terms and located close to a City Centre Retail area, a Local Centre, a District Centre and a range of local amenities,
- The site is not overshadowed and allows residential windows to be located on most elevations,
- There are sufficient statutory service connections readily available in close proximity to the site.
- The site is flat and is not at risk of flooding

Weaknesses

- There are existing habitable windows overlooking part of the Eastern boundary, which will have an impact on Design.

Opportunities

The site provides an opportunity to:

- address an identified need for affordable housing,
- provide high quality accommodation in a sustainable location with easy access to the wider region and employment opportunities.
- ensure that safe access for all is provided to the proposed building(s).
- provide a development that is sustainable in its construction and ongoing use.
- provide a development that is sensitive to its wider environment and does not adversely affect neighbouring occupiers.
- To provide a design that respects the setting of the nearby Listed Buildings,
- To significantly increase the biodiversity on the site by inclusion of landscaping features

Threats

- A change of use from Employment to Residential use is required.

Design Brief:

Following a detailed analysis of the site the following points were seen as important in the development of the building design and site layout:

- The brief agreed between the Developer and CCHA is to:
- Provide high quality accommodation fully compliant with Welsh Design Quality Requirements (DQRs) and Lifetime Homes.
- Provide a development that achieves the client's operational and economic brief.
- Ensure that safe access for all is provided to the proposed building.
- Provide a development that is sustainable in its construction and ongoing use.
- Provide a development that is sensitive to its wider environment and does not adversely affect neighbouring occupiers.
- Provide a development that makes a significant architectural contribution to the area.

3.0 Design Analysis

The final design for the Proposal, shown on the submitted plans, has been developed in accordance with the agreed brief and following the detailed appraisal of the site set out above. The evolution of the design, and a description of how it relates to the character and context of its surroundings, is set out below.

Design Development/Evolution

The design has been developed as stated above and also to reflect comments made on the pre application advice for previously submitted schemes.

The following proposal was submitted for pre application advice in August 2022 by the site owners:



Pre application advice was provided in October 2022.

The main concern raised in the advice was the conflict with Policy EC3, which protected Employment Use. This appeared to be a major stumbling block for the proposal.

Since that date the existing building has become vacant and a more robust justification can be provided as set out in the following Planning Appraisal (Section 4). It is anticipated that the justification provided will be acceptable and the major obstacle to the development can be overcome.

Other matters raised in the previous pre application advice were:

- The height of the large apartment block (6 storeys) and its impact on existing residential amenity.
- Impact on the character of the area,
- Extent of parking dominating the site layout,
- Lack of active frontage at ground floor level,
- Relationship to adjacent Listed Buildings
- Impact on adjacent businesses,
- Amenity space provision,
- Stopping up requirements for existing access road and boundary issues.

Taking on board the matters raised above a revised scheme was submitted for pre application advice by the current applicants. The scheme proposed at that stage is shown below:

These matters are addressed generally in the following Design Solutions sections below.

The scheme included 61 affordable housing units within a 4/5 storey apartment block (50 units), a separate 3 storey apartment block (6 units) and a row of 5, three storey town houses.

Following pre application advice (described in section 4) the mix was revised and the massing and orientation of the larger blocks (A&C) was revised to meet the concerns identified.

It is believed that the currently proposed scheme is a considered response to the pre application advice resulting a development that will provide a high quality and sustainable environment for future occupiers and meet all placemaking principles.



Design Solutions

Movement

Refer to section 6: Access Statement of this document for details of movement to and from the site/building.

Access

Refer to section 6: Access Statement of this document and the site and building layout sections below.

Use

The proposed use is residential with a mix of apartments and 2 storey houses as described below with associated parking for the houses only.

Whilst the site is currently designated for Employment use under Planning Policy EC1, it is immediately adjacent to a well-established residential area.

The site is currently vacant and the Planning Section later in this document sets out the case for allowing a change to residential use.

In all other aspects the site is ideally situated for residential use due to its demonstrably sustainable location on the edge of a well-established residential area and the easy connections to local amenities.

The various building types (houses/apartments) are described in the flowing sections.

Amount

The scheme provides for 62 dwellings in three distinct blocks/areas:

Block A

A 3/4/5 storey apartment block containing 52 common access apartments with the following mix:

- 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 the following mix:

- 6 number 2 person 1 bed apartments (2P1B) each approx. 51.30m²

The overall area of the site is 3,800m² (0.38Ha, 0.94acres). This gives an overall site density of 160 units per hectare, which is in excess of the minimum density required by Residential Design Guidance SPG, which is 45+ dwellings per Ha for a site fronting a spine road.

The inherently sustainable nature of the site in terms of access to public transport, local facilities and potential employment would encourage a higher density of development to take best advantage of the opportunities presented.

The apartment sizes are in line with established norms and are in full compliance with Welsh Design Quality Requirements (DQRs) Beautiful Homes and Spaces 2021, and Lifetime Homes, in terms of overall size and internal layouts.

The development is proposed to be 100% affordable, with all of the proposed residential units to be secured as affordable in perpetuity. The RSL's Housing department have carefully considered the housing mix to satisfy the demand in their housing register, and also looking at possible future needs.

There is no space standard for houses or apartments in the Residential Guidance SPG but all the proposed houses meet the minimum space requirements of DQR(2021).

In terms of amount, whilst the number of dwellings proposed across the site is greater than the surrounding area the scheme sits comfortably within its context. Consequently, it would not have a negative impact on the existing built form when including the 5-6 storey Maltings building opposite the site into context. Please refer to Street Context elevations (1722PAC-14) and the extract below:



The proposed 5 story element of Block A, with a flat roof is considerably lower and less bulky than the Maltings building opposite, which has a high, visually dominant roofscape which significantly increases its perceived height and massing.

Site Layout

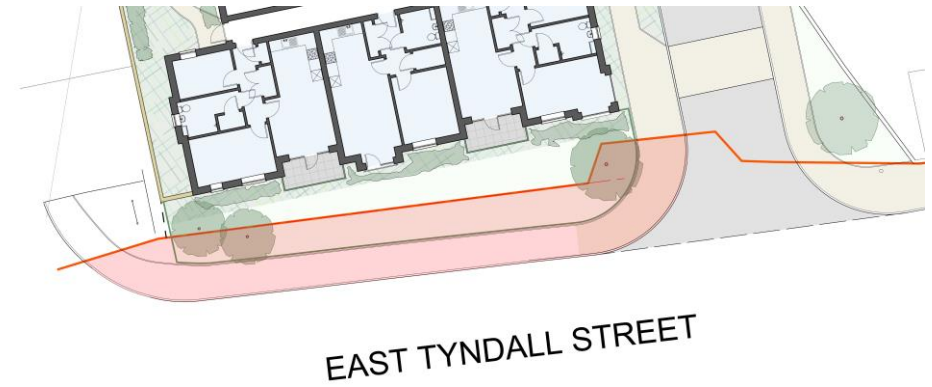
The proposed site layout is shown on drawing 1722PAC-05 (proposed site plan) and the extract below.



The site access in a similar location to the existing crossover, with minor alterations needed to accommodate the new layout.

It is understood that there are currently areas of the site ownership that are adopted highway and that a stopping up order and possibly transfer of land ownership will be required to accommodate the proposed development.

The sketch below shows the extent of the existing Highway proposed for stopping up shaded pink, with the extent of the currently adopted highway shown by the orange line:



A 2m footpath will be retained across the front of the site with dropped kerbs and tactile paving at the crossover to the site entrance. This footpath will be improved and will be part of the proposed upgrade of the Active Travel provision in the area set out in the 'Willows High: Active Travel & Road Safety Improvements' consultation document prepared by Cardiff City Council.

This footpath will extend into the site on both sides of the proposed site access road, which is 5m wide. The footpaths are separated from the road by a series of linear rain gardens. In addition contributing to the SAB strategy for the site these raingardens will discourage on street parking and improve safety for pedestrians and cyclists within the site.

The road is providing vehicular access for only the 4 parking spaces for the 2 storey houses and delivery and emergency vehicles. As such traffic movements are few further contributing to the safety of residents on site.

The current proposed road can accommodate delivery and emergency vehicles and the need to provide vehicular access to the houses creates a natural 'hammerhead', to allow such vehicles to turn and thus enter and leave the site in forward gear.

The left hand (western) footpath, or pedestrian route, gives access to the main entrance to the Apartment Block (A), along with the bin and cycle stores that are located within the building. See building layout for details. The footpath extends to provide safe pedestrian (and cycle) access to the 4 houses at the northern end of the site.

The Eastern footpath provides access to the smaller block of common access apartments (Block C). A section of planted rain garden breaks up the line of this footpath to reduce the dominance of hard surfaces at the entrance to the site. The

footpath skirts behind the rain garden, which is part of the SUDs strategy for the road, and extends to the entrance of Block C.

The footpath connects to paved area to the South of Block C which provides a suitable location for a covered and secure bin store. The store has been sized to meet the requirements of the SPG and is easily accessible by both residents and waste collection operatives.

A secure fence and gate separate this public space from a large private garden and paved area that provides communal amenity space of 133m², for the apartments in Block C. This is in excess of the 85m² required by the residential design SPG. Whilst the preference would be for this area to be entirely open and communally available, the Secured by Design Report has suggested that some form of fencing / separation is required. The space is accessed by a door at the rear of the common staircase in block C giving easy access to all residents.

A low level open hop top fence is proposed to the southern site boundary along the back of the pavement to East Tyndall Street. This connects to the building and the western site fence (see below) and creates an area of defensible space between the public and private realms.

The Western boundary of the site will be defined by a 1.8-2.0m high timber acoustic fence as required by the Noise Assessment of the site. This will provide security between the site and the adjacent commercial units as well as acoustic and visual separation.

The area between this fence and Block A will be heavily landscaped and include a series of raingardens to treat and attenuate the run off water from the roof of Block A. This will be shown in more detail on a SUDs drainage strategy that will be included with a full planning application.

This area of 272m² will provide an element of communal amenity space to Block A and is accessible from both the northern and southern staircases. A footpath connects the 2 entrances to the space and also provides access to a paved area at the northern end that can accommodate clothes drying facilities.

This landscaping, shown on drawing 1246-SK01-Rev A Landscape sketch, will soften the visual impact of the acoustic fence and provide an area of visual and physical amenity space for residents.

A similar pattern of rain gardens and landscaped areas run along the eastern front of block A. This provides a sustainable drainage solution and also creates a zone of defensible space and separation between the ground floor apartment windows/patios and footpath.

Similar rain gardens and planting is proposed around the perimeter of Block C, with an area of landscaped communal amenity space for the whole site, created between the road and the site boundary to the North of the block.

The existing 2m high (approx) brick and stone boundary wall along the eastern site boundary will be retained (see photo page 10). This wall, which extends the full length of the boundary will be softened by the introduction of hedge planting and general landscaping as shown on the landscaping strategy sketch below:



The existing stone/brick wall continues along the northern boundary providing separation between the Listed Mission Hall and the rear private gardens of the houses (Block B). These gardens will be laid to lawn with rear patios and raingardens to accommodate roof run off as part of the SUDs strategy. The area of each gardens is in accordance with Welsh DQR(2016) as there is no guidance in current DQRs. At a min of 46m² the garden areas also meet the requirements of the Residential SPG.

Defined rain gardens are included to the front of the houses to assist in the SUDs strategy and to provide an element of defensible space between the houses and the footpath that runs along the road in front of the houses.

Parking for 2 cars is provided between the pairs of semi detached houses, which have windows from living spaces overlooking the parking area to provide natural surveillance in accordance with SBD guidance. The remaining to parking spaces, at either end of the hammerhead and easily accessible from the relevant houses and are clearly visible from all houses, and the apartments in Block A, again providing natural surveillance

The overall area of landscaping around the buildings that provides visual and physical amenity space for residents of Block A is approx. 660m². This equates to approx. 8.14m² per occupant of Block A (81). This comprises the private garden to the West (272m²), the private space to then South of the block (122m²) and the communal space to the North of Block C (265m²) as shown on then image opposite:

The residential Design Guide recommends that for communal gardens (amenity space) an area of 75m² is required for 5 units with an additional 10m² for every further unit. This equates to an overall requirement of 645m² (75 + (57x10)). The area provided is therefore in accordance with the recommended amount. The areas shown do not include the raingardens to the eastern side of Block A and all areas are accessible and useable as amenity space for residents.

In addition to the amenity space shown all 2 bed apartments have private amenity space on balconies of patios for Ground Floor units.

This provision of high quality landscaped amenity space is possible within a dense scheme due to the sustainable nature of the site and the subsequent reduction (or removal) of parking spaces for the apartments.



The reduction in parking therefore has a significant impact on amenity by increasing biodiversity and amenity space whilst ensuring air quality is not an issue.

Building Layout

Detailed proposed layouts are shown on the submitted floor plans (drawings 1722PAC-06 & 07). The following is a brief description of the internal layouts of the blocks.

Block A:

Block A is between 3 and 5 storeys with a repeating (stacked) plan form to facilitate service and drainage runs within the building.

The Ground Floor has some communal facilities as described below. The first, second and third floors are exact repeats with the fourth floor being smaller and consisting of only 4 apartments at the southern end.

There are 2 apartment types, 2 person 1 bed units and 3 person 2 bed units. All units are fully compliant with Wales DQR(20121) in terms of space standards and internal layouts.

The apartments are served by a central corridor linking the main entrance and accommodation staircase at the southern end and the secondary fire escape staircase at the northern end.

A full disabled lift is provided in the main entrance core to serve all floors and the staircase is fully Part M compliant.

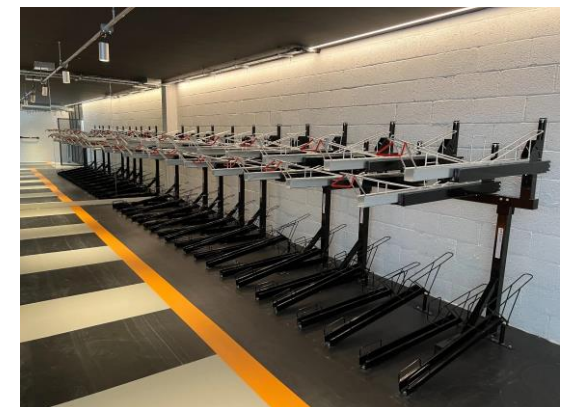
There are 4 apartments on the fourth floor and 12 on each of the first, second and third floors. On the ground floor 2 apartments are replaced with communal facilities including a services area (meters etc), a bin store and a cycle store.

Cycle Storage facilities

Cycle storage is provided in accordance with the Transport Impacts SPG (Table P9) which requires 1 space per bedroom. The cycle parking provision is shown on drawings 1722PAC-06 and 07 and as set out below:

Block A requires 65 cycle parking spaces. The drawings currently show an area of 44 spaces, with vertical storage proposed.

However, should 2 tier cycle parking be acceptable it is anticipated that the 65 spaces can be



accommodated in the area shown on the drawings with space for a number of standard Sheffield hoops for larger bikes or residents who cant access 2 tier racks .

The proposed storage type would be BDS Two Tier Bike Rack with a gas-assisted strut as shown in the image below and described at the following link:

<https://www.bikedocksolutions.com/two-tier-bike-rack-bds>

The cycle store is accessed directly off the footpath along the eastern elevation of Block A and will have secure lockable doors. There is an internal door to the GF corridor which gives access to remainder of the building.

Block B houses require 2 cycles per dwelling. The bikes can be stored securely in the garden sheds which will be SBD compliant and located within the private rear gardens. Each shed will be large enough to accommodate the 3 cycle plus space for general gardening tools.

Block C requires 6 cycle spaces. These are provided in a dedicated secure cycle store within the private rear communal space, The store will be SBD compliant and have a green roof.

There are limited suppliers of SBD compliant cycle shelters so it is likely that the store will be provided by Urbanspec and be similar to the image opposite.



<https://urbanspec.co.uk/products/bike-hubs/>

Bin storage

For Block A, a dedicated bin store has been proposed within the building on the Ground Floor. This store is accessible from outside as shown on the plans:

The bin store has been designed to accommodate bins for general waste and recycling for the apartments and the commercial units in accordance with the current CCC Waste SPG as set out below.

Residential based on Table 3 of SPG and 52 apartments.

This requires:

Recycling 6600L
General 6600L
Food 720L
Bulky storage 10m²

Number of Flats (up to 3 Bedrooms)	Recycling (L)	General (L)	Garden* (L)	Food** (L)	Reuse/Bulky Storage
5	660	660	-	240	-
10	1100	1100	-	240	5m²
15	2200	2200	-	240	5m²
20	2200	2200	-	240	5m²
25	3300	3300	-	480	5m²
30	4400	4400	-	480	5m²
35	4400	4400	-	480	5m²
40	5500	5500	-	480	5m²
45	6600	6600	-	720	10m²
50	6600	6600	-	720	10m²

Total provided, 12 x 1100l bins, 3 x 240l plus 10m² bulky storage

Bins are accessible from the front of the building via a pair of ventilated (louvred) double doors. A drop kerb is proposed on the site road to facilitate easy collection by waste operatives over a level path leading directly to the bin store doors. The overall distance for waste operatives is less than 3m.

Sufficient space is provided around all bins to ensure that they are accessible to users and easily manoeuvrable by waste operatives of management staff.

Suitable storage space s included within each kitchen for the local storage of general waste and recycling prior to it being placed in the communal collection bins.

This way if a weekly bag collection system is adopted by the Council, residents will have sufficient space internally to accommodate the waste/recycling.

For Block B houses, it is envisaged that council supplied waste bins/bags are accommodated within the rear garden space and then moved to the kerbside on collection days as per usual practice in Cardiff. There is also suitable space in each house to accommodate recycling and waste. This is a requirement of DQRs.

For Block C, a dedicated bin store is provided within 18m of the site entrance and adjacent to the adoptable site access road with a dropped kerb from the pavement level. The secure store is also within 13m of the apartment block entrance ensuring easy and level access for residents.

The above chart from the Waste SPG and advice as part of the pre app shows that for 6 apartments the following waste storage provision is required:

Recycling	660L	Total provided, space for 2 x 1100l bins, 1 x 240l plus 5m² bulky storage
General	6600L	
Food	240L	
Bulky storage	5m²	

It is understood that the Waste SPG will be updated soon to reflect the move to segregated recycling streams. Advice given in the pre app suggests that for Block A the 6 x 1100l recycling bins would be replaced with 3 x 1100L bin for mixed fibres (paper & card), 3 x 1100L bin for plastic & metal and 5 x 140L bin for glass. These bins can be accommodated within the proposed bin store

A Waste Management Plan will be prepared by the applicant to support the full planning application as requested in the pre app advice.

Block B:

Block B is effectively a row of 4 houses in a pair of semis. Each house is a 5 person 3 bed unit that fully complies with Welsh DQRs(2021) in area and layout.

The houses consist of a living room, kitchen and Wc on the Ground Floor with 3 bedrooms to the First Floor. The living rooms are South facing and look out over the front of the houses with the kitchens located at the rear with access to the rear gardens.

Block C:

Block C is three storey providing 6 no 2 person 1 bed common access apartments, with 2 per floor.

The apartments are fully compliant with Welsh DQR(2021). The Kitchen/living areas are generally East facing but are dual aspect with full height glazed doors/windows with an external Juliet balcony facing either North or South. These are do not overlook any adjacent properties).

There are no habitable room windows in the Eastern gable to ensure no overlooking of the rear residential properties on Ordell Street.

Scale

The scale of the proposed development is an important consideration given the proposed height of the southern end of Block A and issues raised as part of the Pre application advice.

Block B houses are domestic in scale at 2 storeys and act as a buffer between the development and the Listed Building to the North.

Block C, whilst a storey higher than the adjacent residential is of a scale appropriate to the site and the location within it.

As stated above they do not impact negatively on the adjacent houses and respect the relevant Planning Policies in terms of overlooking distances a general massing.

These blocks form a buffer and a gradual increase in scale between the 2 storey housing and the 3-5 storey Block A.

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. The visible sky available to the houses is in accordance with the residential SPG

The block then rises to 4 storeys for the middle section before rising further to 5 storeys at the southern end of the site where it faces East Tyndall Street and is read

against the Maltings Building opposite, which is some 10.3m taller at its apex. Whilst this is generally related to the large pitched roof the eaves of the building are equivalent in height to the roof of the proposed development.

Given the proposed heights relative to the Maltings building and the fact that the proposal seeks to provide a 'gateway' into East Tyndall Street (see below), it is believed that the scale of the proposed development is an appropriate response to the site and its surroundings.

Appearance

The appearance of the proposed development is shown on the submitted elevations and the extracts below:



The general design intent is to create an urban industrial feel to the development to reflect the surroundings at the edge of a commercial area and respect the Listed Maltings building opposite the site.

To reduce the height and perceived scale of Block A, a flat roof has been used. However, to reflect and complement the Maltings building a grey cladding has been used on the fourth and fifth storeys.

This double height clad façade at the southern end reflects the arrangement of the maltings roof as it peaks at the northern end with a dominant steeply pitched roof scape presented to East Tyndall Street.

The rise in roof height to the southern end also provides a visual gateway to East Tyndall Street commercial area when set with the Maltings building viewed from the east.

The materials proposed are references to the Maltings Building and also a successful urban development in Cardiff as shown on the photographs below. This shows the proposed brick colours and general 'feel' of the scheme, albeit the proposed development is of a greater scale and height.



Dark grey/black windows and doors are proposed along with similarly coloured rainwater goods and Juliet balconies on all facades. Again this takes reference from the maltings building and the extensive iron work staircases on its eastern elevation. The mix of colours on the townhouses reduces the perceived massing and emphasises that this is a row of separate dwellings. This enhances the transition from smaller scale terraced housing to the larger apartment block.





Landscaping

The proposal includes a significant area of landscaping with a combination of amenity grass, biodiverse meadow grass and raingardens. There are a number of trees proposed to further enhance biodiversity. This is shown on the draft landscaping strategy drawing prepared by DLP Landscaping Consultants.

In the previous pre application advice it was suggested that a soil assessment would be required as part of any application. The applicants have consulted a recognised Soil Consultant, Land Research Associates, who have confirmed that as the site is entirely covered with buildings and hard landscaping there will be no recoverable soil and as such an assessment should not be required.

Ecology

Given the fact that the site has no existing ecological value or significance, any addition of landscaping or ecological features will be a net biodiversity gain or benefit.

A full Green Infrastructure Statement will be included with any future application. A summary of the approach taken is included below:

- No vegetation removal will take place during the bird nesting season. The existing areas of vegetation are limited.
- Any existing trees on site are to be retained and any works required in their vicinity will be subject to the detailed requirements in a Tree Report that will be included in the full planning application.
- Significant areas of new landscaping are proposed which will be designed and specified by a suitably qualified Landscape Consultant.
- Bird boxes will be installed on the North facing elevations of Blocks A and C.
- Vivara Pro Woodstone bat boxes (see opposite) will be installed at eaves level on the south elevations of Blocks A and C.
- Any external lighting will be selected to ensure there is minimal light spillage that could affect foraging bats, nesting birds and invertebrates. Any new external lighting will meet the recommendations in the BCT Guidance Note 08/18 Bats and artificial lighting in the UK document:



<https://theilp.org.uk/publication/guidancenote-8-bats-and-artificial-lighting/>

Community Safety

The site is self-contained and surrounded by adjacent buildings or boundary walls which give an element of security to the site. Whilst the site entrance is open all external areas benefit from extensive natural surveillance to meet the requirements of Secured by Design.

A detailed report has 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.

There will be a security system/key access to the main entrance door to improve residents' security and safety.

Individual flats will have their own entrance door with suitable locks and security and the number of flats on each floor is limited.

The introduction of a building for residential purposes with windows facing the main street will improve visual scrutiny of the area as a whole with a related increase in Community Safety.

There are no adjacent properties adversely affected by the proposed development.

4.0 Planning Statement/Consultation

This Section identifies the National and Local Planning Policies that apply to the proposed development and briefly states how the proposals meet these Planning Requirements.

Planning

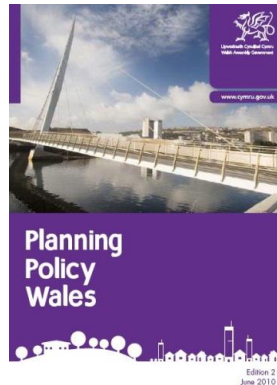
National Planning Policy is set out in Planning Policy Wales (Edition 11 February 2021), Ministerial Interim Planning Policy Statements (MIPPS) and Technical Advice Note (TAN) 12: Design, 2009.

PPW clearly identifies the need to deliver well designed and sustainable development within settlement boundaries and preferably on previously developed or brownfield land.

This proposal meets those aspirations and further requirements included with the various advice notes that support PPW

TAN 12, sets out 12 objectives of good design and it is contended that this proposal meets all of these requirements, which are:

- Ensuring ease of access for all
- Sustaining or enhancing local character
- Promoting legible development
- Promoting a successful relationship between public and private space
- Promoting quality, choice and variety
- Promoting innovative design
- Ensuring attractive, safe public spaces
- Security through natural surveillance
- Achieving efficient use and protection of natural resources
- Enhancing biodiversity
- Promoting sustainable means of travel.



The following additional National Policies are also believed to apply to the proposal and have been considered during the design process:

- TAN 5: Nature Conservation and Planning
- TAN 11: Noise,
- TAN 15: Development and Flood Risk,
- TAN 18: Transport,
- TAN22: Planning for Sustainable Buildings.

In addition to the specific planning legislation the following general Welsh legislation is also relevant from a general wellbeing perspective:

- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016
- Building Better Places: The Planning
- System Delivering Resilient and Brighter Futures (2020)

Local Planning Policy

Local Planning Policy

The relevant Local Planning Policy is the Cardiff Local Development Plan 2006 - 2026, adopted January 2015. This replaced the Unitary Development Plan.

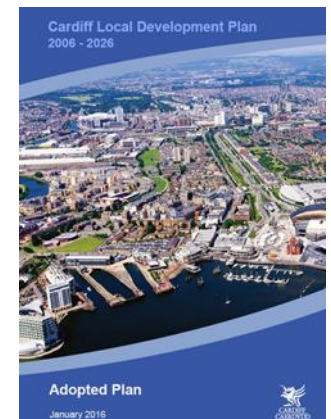
The Proposal has been designed to adhere to the aims and Objectives of the Core Policies set out in the LDP generally and with specific policies where relevant.

On the LDP Proposals Map the site lies within the urban area boundary and is allocated for Employment Use (EC1.1).

The following key policies within the LDP are deemed to be relevant.

Key Policies

The following Objectives and Strategic Policies set out in the LDP are deemed to apply to the Proposal and have been adhered to. These are the Policies that have been identified as relevant in the Pre Application Advice notes. The appropriate section of this document is referenced in blue in the following table:



Ref	Title	Summary
Cardiff LDP 2006-2026, adopted January 2015		
KP4	Master Planning Approach proposals will be required to adhere to a series of master planning principles including being located in sustainable locations, providing good connectivity and responds to local context . Refer to: The principal of Development, Access Statement, Sustainable Design & Transport
KP5	Good Quality Sustainable Design all new development will be required to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces... Refer to: The principal of Development & Design Considerations
KP6	New Infrastructure	... seeks to ensure that new developments, irrespective of their size, location, or land use, make appropriate provision for infrastructure. Specific infrastructure requirements will vary in different locations and be dependent upon the scale and nature of proposed development Refer to: The principal of Development
KP7	Planning Obligations	Proposals of this scale may be required to provide or make contributions to infrastructure and other planning gains. Refer to: Planning Obligations
KP8	Sustainable Transport	To ensure that developments do not encourage the use of private cars and can help to reduce demand for such trips. Refer to: The principal of Development, and Transport
KP14	Healthy Living	Policy 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. Refer to Principle of Development, Sustainable Design and Transport
KP15	Climate Change	Policy to ensure that all development in the city is sustainable, taking full account of the implications of reducing resource use and addressing climate change. Refer to Sustainable Design
KP16	Green Infrastructure	Proposed development should demonstrate how green infrastructure has been considered and integrated into the proposals. If development results in overall loss of green infrastructure, appropriate compensation will be required Refer to Landscape, Nature Conservation and Ecology

Ref	Title	Summary
KP18	Natural Resources	development proposals must take full account of the need to minimise impacts on the city's natural resources and minimise pollution, Refer to Landscape, Nature Conservation and Ecology
H3	Affordable Housing	The Council will seek 20% affordable housing on Brownfield sites and 30% affordable housing on Greenfield sites in all residential proposals that: Contain 5 or more dwellings. Refer to Principle of Development & Affordable Housing
H6	Change of use or redevelopment to residential use	Change of use of redundant premises or redevelopment of redundant previously developed land for residential use will be permitted if certain tests are met Refer to: Principle of Development & Change of Use
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 unless a case can be made for change of use Refer to: Change of Use
EC3	Alternative Use of Employment Land and Premises	Policy provides criteria against which proposals for the change of use of business and industrial land and premises will be assessed. Refer to: Change of Use
EN7	Priority Habitats and Species	This Policy seeks to protect and enhance the features of Cardiff's natural heritage, including its biodiversity and abundance of wildlife habitats and native species. Refer to: Landscape, nature Conservation and Ecology
EN8	Trees, Woodlands and Hedgerows	The purpose of the Policy is to protect trees, woodlands and hedgerows with natural heritage or amenity value. Refer to: Landscape, nature Conservation and Ecology
EN13	Air, Noise, Light Pollution and Land Contamination	Policy ensure that development does not cause 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. Refer to Community Safety
EN14	Flood Risk	Policy is to avert development from where it would be at risk from river, ordinary watercourse, coastal, surface water flooding or where it would increase the risk of flooding or additional run off from development elsewhere Refer to Flood Risk

Ref	Title	Summary
T1	Walking and Cycling	Policy to favour and encourage 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. Refer to Transport
T5	Managing Transport Impacts	Policy to encourage development that properly address the demand for travel and its impacts and contributes to reducing reliance on the private car. Refer to Transport
T6	Impact on Transport Networks and Services	Policy to protect the transport network and its users from developments which may otherwise cause unacceptable harm to the operation and use of key transport networks and routes. Refer to Transport
W2	Provision for waste management facilities in development	Policy is to ensure that adequate provision is made for waste management facilities within new developments. Refer to Waste

Supplementary Planning Guidance

The following Supplementary Planning Guidance Documents (SPG) and Technical Guidance Notes (TGN) are deemed to apply to the development generally and have been adhered to in the design of the building as referred to elsewhere in this document, particularly the Design Statement in Section 3: Design Analysis:

Ref	Title	Summary
Supplementary Planning Guidance documents		
SPG	Affordable Housing (2015)	Sets out guidelines affordable housing contributions either on or off site: Refer to Principle of Development
SPG	Green Infrastructure	Sets out how biodiversity should be conserved and enhanced throughout the development control process Refer to Landscape, nature Conservation and Ecology
TGN	Trees and Development	provides guidance on the protection and planting of trees as part of development, in the interests of maintaining and enhancing a diverse urban forest. Refer to Landscape, nature Conservation and Ecology

TGN	Public Rights of Way and Development	to provide guidance on the range of policies in the existing Local Development Plan for Cardiff relating to public rights of way. Refer to Transport
TGN	Protection and Provision of Open Space in New Developments; Soils and Development) (November 2017)	explains the Council's approach towards safeguarding existing areas of open space which contribute to the recreational, amenity or nature conservation resources of the city. It sets out the basis upon which open space provision for new housing developments are assessed, including how much open space is to be provided and what type of provision will be sought. Refer to Landscape, nature Conservation and Ecology and Design Considerations
TGN	Soils and Development (Nov 2017)	enables developers, landowners and potential objectors to understand how the Council considers development proposals and the standard of provision sought for the retention or importation of soils. Refer to Landscape, nature Conservation and Ecology
SPG	Managing Transportation Impacts, Car Parking Standards (July 2018)	This document sets out the standards and level of parking for vehicles and cycles required for developments. It is based on the Welsh Parking Standards 2010. Also sets out guidance on the impact of development on existing transport infrastructure Refer to Transport
SPG	Planning Obligations (Jan 2017)	Sets out guidelines for any Planning Obligations required as part of the Planning process: Refer to all sections
SPG	Residential Design Guide (Jan 2017)	Establishes the principles to be adopted in the design of major residential developments Refer to Design Considerations
SPG	Waste Storage and Collection (Oct 2016)	Sets out the requirements for the storage and collection of recycled material and general waste from developments Refer to Waste

Planning Appraisal

The previous chapter identifies the relevant planning policies that should be considered in developing the design and assessing the Planning Application. Accordingly, this chapter provides an appraisal of the proposed development against this planning policy framework and other material considerations to demonstrate the acceptability of the proposals in Planning terms.

The key issues have been identified as:

- Principle of Development
- Change of Use
- Affordable Housing
- Planning Obligations
- Design considerations
- Sustainable design
- Landscape, nature Conservation and Ecology
- Transport
- Services Capacity
- Flood Risk
- Communal safety
- Waste management

The Principle of Development

The development proposal is to provide 62 number 100% affordable housing units, comprising 4 houses and 58 apartments immediately adjacent to a well-established residential area on a previously developed site in a highly sustainable location.

Whilst the site is within a designated Employment Area, the tests set out in Policies H6 and EC3 have been met as set out in the following section (Change of Use).

PPW presumes in favour of sustainable development and the proposed development would satisfy PPW's objectives of achieving sustainable development by ensuring that local communities have sufficient housing for their needs and promoting access to employment, shopping and other facilities.

The redevelopment of brownfield sites within sustainable locations for affordable housing is supported by both national and local policies.

The site lies in an urban area, within the settlement boundary and close to local amenities and public transport as set out in the Movement & Infrastructure Section of the Site Analysis. These include a range of community and retail facilities located

within easy walking distance of the site all in accordance with Policies KP4, KP5, KP6, KP8, KP14 and H3.

The proposals are of a reasonable density to make maximum use of the sustainable location on a brownfield site all in accordance with the Affordable Housing and Residential Design Guide SPGs.

Change of Use

As noted previously the site is within a designated Employment Area (EC1.1 Ocean Park) and as such is protected under Policies EC1 and EC3.

Policy EC3 provides criteria against which proposals for the change of use of such sites will be assessed, and states that alternative use proposals 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.*

Knight Frank have prepared a report on the previous marketing of the existing building, the suitability of the building in the current market and the likelihood of securing a tenant in the foreseeable future.

Their conclusion is that the building is not suitable for a modern occupier looking for circa 20,000ft² of commercial space due to the low eaves' height, poor condition and location of the site.

In addition, the availability of more attractive options in better locations has further reduced the likelihood on a tenant being secured.

Alterations to the building are not economically feasible given the restrictions of the location and the availability of alternative premises.

Given the above it is argued that Policy EC3 is satisfied as:

- The premises are no longer well located for business, industrial or warehousing,
- There is no realistic prospect of employment use on the site,

- There is an oversupply of viable and better located alternative sites and as such there is no need to retain the premises for employment use,
- As the premises are currently vacant, and there is little prospect of any future tenant, there will be no unacceptable harm on the operating conditions of existing businesses.

Policy H6: Change of Use or Redevelopment to Residential Use may also be relevant if the premises are classified as being redundant. This could be argued given the previous comments.

In this case a series of tests similar to EC3 apply and are satisfied, as set out below:

- I. There is no overriding need to retain the existing use nor is there an overriding need for any alternative use to residential. There is a demonstrable need for affordable residential use in this area of Cardiff ,
- II. The resulting residential use and amenity will be satisfactory as demonstrated elsewhere in this, and other, sections of this document, ,
- III. There will be no unacceptable impact on the operating conditions of businesses on this, or adjacent, sites,
- IV. The site is in an inherently sustainable location and community transport facilities are accessible (See Transport, Movement & Infrastructure and Access Statement),
PPW recognises the importance of developments being close to public transport infrastructure, such as bus and rail services, to make it easier for people to access sustainable transport options. The development of housing on this site would encourage the use of public transport, walking and cycling as preferred modes of transport, due to the abundance of services and facilities within a short distance. The Welsh Government's Active Travel (Wales) Act 2013 recognises the importance of integrating transport and land use planning. The site benefits from an exceptionally sustainable location, with key city centre amenities and transport links accessible within a short walking distance
- V. Subject to the results of a Contamination Assessment and potential mitigation report it can be demonstrated that there will be no unacceptable risks to future end users. Note. This section will be updated when the results of the desk top contamination Assessment are available.

Given that the requirements of both EC3 and H6 have been met it is believed that the Change of Use to Residential Use will be acceptable, subject to all other planning policies being met.

Affordable Housing

The aim of Policy H3 is to assist the Council to meet evidenced housing need by seeking an appropriate affordable housing contribution from new residential developments in the city and PPW recognises that a community's need for affordable housing is a material planning consideration.

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 this means that just 27% of the need has been met, despite being two-thirds of the way through the plan period.

Splott as a location, is high demand for applicants on the Common Housing Register and is very popular due to proximity to the city centre. There are currently over 8,000 applicants on the common waiting list with over 400 new applications received each month. CCHA manage a number of properties within this location and there are long waiting lists for properties in this area.

The proposed mix of sizes and accommodation types will ensure that a range of households can be accommodated on the site providing a viable community.

The proposed scheme is 100% affordable and will be managed by a recognised Registered Social Landlord. No affordable Housing Contributions will be required.

The proposed development meets the requirements of Policy H3.

Planning Obligations

The Applicant is aware of the Planning Requirement for Affordable Housing as set out in Policy KP7 and the Planning Obligations SPG.

The proposal is for 100% affordable housing which satisfies the requirements of Policy H3 and the Affordable Housing SPG.

It is noted that a Highways Contributions may be required for Traffic Orders/alterations under a Section 106 agreement.

Under the calculation of dwellings in the Planning Obligations SPG the number is 15.313, which will require a contribution based on .

The contribution will be based on Pupil yields. Subject to the final submitted scheme a pupil yield calculation will be carried out to establish the level of Education contribution required. It is anticipated that this will be confirmed in the Pre application advice.

Due to the site restrictions open space cannot be provided on site. A contribution will therefore be required as set out in the Protection and Provision of Open Space in New

Developments TNG. It is anticipated that this will be confirmed in the Pre application advice.

Design Considerations

This Design & Access Statement and plans submitted clearly demonstrate that the scheme will make a positive contribution to the local environment, in terms of its relationship with the surrounding area, and will effectively improve the character and legibility of this part of East Tyndall Street whilst providing much needed Social rented accommodation.

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.

Amenity space is provided on site and is combined with areas for SUDs drainage. To complement the on-site amenity space there are a number of public open spaces close to the development. The closest is the newly completed Malting Park, which provides a range of formal and informal public facilities including children's play areas, a skate park and a MUGA (see Neighbourhood Structure)

Placemaking principles have been adopted in the design as set out in the relevant section.

A palette of materials has been selected which complement the site context, with sustainability at the forefront, particularly energy efficiency, noise and sound insulation.

Detailed information on how the design has responded to the requirements of KP4, KP5, the Open Space TNG and the Residential Design Guide SPG are included in the Design Analysis section of this document.

Sustainable Design

The design has been developed with sustainability at the core of the process. The site is in an inherently sustainable location (see Access Statement and Site Analysis) and is accessible by public transport, cycles and pedestrians.

The Environmental Sustainability chapter in the previous section demonstrates the sustainable nature of the building in construction and operation.

The dwellings will benefit from modern efficient technology to improve efficiency and sustainability whilst future proofing for upcoming changes in domestic energy policy.

The sustainable design and location of the proposed development meet the requirements of Policies KP14 & KP15.

Landscape, Nature Conservation and Ecology

The site currently has limited Ecological value. The proposed design includes a comprehensive Landscaping scheme which will improve and enhance the biodiversity of the site and meet the requirements included in the SUDS regulations.

A Green Infrastructure Statement has been prepared in accordance with Planning Policy to demonstrate that a net gain in Biodiversity can be achieved in the development.

A Tree Survey will identify existing trees on the periphery to be retained and their required Root Protection Zones. These have been respected in the site layout and as such there is no impact on retained trees.

As the site is almost entirely covered with the existing building and service yards/parking it is unlikely that there is any viable topsoil on site. The Landscaping section has detailed advice from a recognised soil scientist confirming this. All imported soil will be subject to the relevant checks and certification set out in the Soils and Development TGN.

The design will therefore meet the requirements of Policies KP16, KP18, EN7, EN8, together with Green Infrastructure SPG, Soils & Development TGN, Protection of Open Space TGN and Residential Design Guide SPG

Transport

The proposed development is in a sustainable location and is easily accessible by foot, cycle and Public Transport. There is a bus stop in close proximity to the development which provides access to services to Cardiff City Centre and the wider Public Transport network beyond. The Sustainable location of the site meets the requirements of KP4, KP8, KP14.

The reduced level on parking on site will reduce the trip generation to and from the site in accordance with T5, and the parking numbers are in accordance with the Managing Transport Impacts (Parking Guidelines) SPG, as set out in the Design Analysis section.

The reduced level of parking is proposed on sustainability grounds and to reduce emissions and improve air quality. This has allowed further green space and landscaping to be provided which will enhance placemaking and the quality of life of residents.

Cycle Parking is provided on site and there are a number of local amenities located within reasonable walking distance of the site. See Section 5: Access which sets out how the proposals are in accordance with the.

Electric charging points are provided on site to encourage use of electric cars to further promote carbon reductions and improve air quality.

There are no Public Rights of Way that will be adversely affected by the proposals. A suitable 2m wide pavement to adoptable standards will be provided across the front of the site.

Detailed information is given in Section 5: Access Statement (Parking) and elsewhere in this document.

As the site is less than 80 units it is not anticipated that a Transport Assessment or Travel Plan will be required to support a Planning application. However, if it would be beneficial a Draft Travel Plan can be provided along with a simple Transport Assessment and Parking survey.

This will meet the requirements of Policies KP8, KP14, T1, T5 and T6 together with Managing Transportation Impacts SPG and Public Rights of Way TGN

Services capacity

There is suitable capacity in the existing foul sewer system to accommodate the development as confirmed by Dwr Cymru/Welsh Water. All other services are present adjacent to the site and have sufficient capacity to serve the proposed development. The Proposal does not have any negative impact on local infrastructure facilities and is in accordance with Local Planning Policy.

Flood Risk

As set out in Section 2 the site is within a C2 Flood Zone. An initial Flooding Note has been prepared that demonstrates that the risk of flooding on the site is acceptable and that there will be no adverse impact on neighbouring properties as a result of the development.

A full Flood Consequence Assessment (FCA) will be provided with the formal planning application in accordance with EN14 and TAN15.

Communal Safety

Provision is made for existing and future residents with the adoption of measures incorporating recognised designing out crime. The design will be registered with Secured by Design for Gold Award, (as referred to in Section 3: Design Analysis/Communal Safety). This is required for Grant funded affordable housing, and all requirements of the Designing Out Crime Officer are included in the final design.

The site is subject to potential noise from adjacent roads and commercial premises, as addressed in the site analysis section. The design will mitigate the impact on potential residents as set out in the design analysis section and in accordance with the recommendations of the submitted acoustic report.

The development's impact on air quality is not deemed to be detrimental as set out previously and the requirements of EN13 have been met.

The proposals will not have an adverse impact on neighbouring properties. There are no perceived implications for noise, air or light quality from the proposed development.

Waste

Suitable provision has been made for the storage of recyclable materials and general waste within the apartments.

A dedicated bin store is provided to accommodate the number and sizes of bins required by the Waste SPG. The bin store is located to enable easy collection by waste operatives and within easy reach of both entrances to the building.

Details of the provision for waste storage and collection are included in the Design Analysis: Waste section of this document.

The proposals meet the requirements of Policy W2 and the Waste Storage and Collection SPG.

Summary

Given the detailed responses above it is believed that the proposal is in accordance with all relevant National and Local Planning Policies.

Consultation

Flooding NRW

The Environment Agency web site and Development Advice Map has been consulted and it has been identified that the site lies in a C2 Flood Zone. See Site Analysis and for details.

Pre Application Advice

Pre application advice for a previous proposed development is available as set out earlier. The issues identified in that advice (PA/22/00069/MJR) have been assessed and where appropriate to the current proposals have been addressed as set out in Section 2 of this document.

Formal pre application advice has been received (PA/24/00133) and has been implemented into the revised design now issued for formal Pre Application Consultation described below.

The following sets out the formal pre application advice received and how the scheme has responded.

The Planning Officers advice is set out in clear sections which are repeated below:

Principle of Development

The pre advice concluded that the case for loss of employment had been made in the Knight Frank Report, and as such the principle of development could be supported, subject to a financial contribution to mitigate the loss of this site to an alternative use in accordance with Policy KP7 (Planning Obligations). Further information is included in Section 4 above and Amity's Planning Statement.

Flood Risk

The submitted Flood Risk Assessment (FCA) has demonstrated that any risk of flooding can be managed and the potential impact on adjacent properties can be mitigated.

Placemaking: Impact on local Character

The scale and density of the development was identified as being a key consideration in any future proposals and in particular the impact on adjacent residents' amenity.

The changes in the height and massing of Block A, particularly at the northern end where it relates to the 2 storey houses has addressed some of the matters raised.

The realignment of Block C and the reduction in height of the houses has reduced the potential impact on houses in Ordell Street.

The introduction of raingardens along the street edge has brought the landscaping closer to the road and reduced the impact of hard surfaces through the centre of the site.

Balconies have been introduced to the 2 bedroom apartments to provide private amenity space and partly reduce the requirement for communal amenity space to a level that can be achieved on the site.

The southern aspect of Block A has been improved to provide a more active frontage and design the better turns the corner into the site from East Tyndall Street.

Impact on Heritage Assets

The relationship with nearby buildings, particularly the Listed buildings to the North and South of the site was identified.

A document assessing the impact on the setting on Heritage Assets (Listed Buildings) has been included with the application..

Impact on Residential Amenity

The change to the orientation of Block C and the reduction in height and massing of Block B has significantly reduced the potential impact on the adjacent residential properties on Ordell Street and East Tyndall Street.

Future Occupiers

Balconies and patios (for Ground Floor units) have been included in the 2 bed apartments to provide private amenity space.

Dedicated communal amenity space, in accordance with the requirements of the residential design SPG has been provided for both Blocks A and B.

Some apartments still overlook the adjacent commercial premises. However, the design team and the applicant do not consider this detrimental to the outlook of the apartments.

There are plenty of examples of successful residential developments within urban industrial environments..

Pollution and Contamination

Detailed surveys of the existing building and site will be carried out to identify any potential contamination and measures required to mitigate any impacts. These will be scoped with the Council's Contamination Officer and provided as part of the full planning application.

Highways and Sustainability

It is recognised that the site is in an inherently sustainable location allowing for a reduction in car parking on site. Suitable cycle storage has been provided on site. The internal footpaths are connected to the improved footpath across the front of the site, which will have tactile paving and dropped kerbs.

East Tyndall street is part of a planned upgrade to the local Active Travel network and safe schools upgrades for Willow High School.

Trees, Landscaping and Ecology

A Tree survey has been carried out to identify the small number of trees on the site. A Tree Constraints plan has also been prepared to show what protection is needed for these trees during construction.

A Landscaping Strategy drawing has been submitted. A full landscaping design will be included in a future full planning application.

A Green Infrastructure Strategy has been provided to support the application that shows a significant net gain in ecology on the site as a result of the development.

Waste Provision

This document sets out how the design has accommodated the required areas and stores for waste and recycling. A Waste Management Strategy prepared by the applicant will be included in the application.

Planning Obligations

The planning statement prepared by Asbri addresses this matter.

The advice also sets out the documents that would be required for a full planning application. The table below lists these requirements and addresses which documents have been submitted in response:

Requirement	Response
Location Plan	Drawing 1722:PAC:01
Scheme drawings	Drawings 1722:PAC-02 to 15 and 1722:WG-01 to 06
Design and Access Statement	1722:PAC-DAS
Planning Statement	Amity Planning Statement
Heritage Statement	1722:PAC:HS
CGI Visuals	Drawings 1722:PAC-14 & 15
Statutory Pre-Application Consultation (PAC) Report	To follow
Flood Consequence Assessment	IOW-JBAU-XX-XX-FN-Z-0001-S3-P03-FCA_update_290922
Landscaping Scheme	1246_SK01_Rev A_Landscape Strategy
Tree Survey	25.04.25 Magnet Site, East Tyndall Street, Cardiff
Drainage Strategy	10683-GRY-XX-XX-DR-C-0002-P01-Proposed Drainage Strategy
Contaminated Land Assessment	To follow in full application
Preliminary Ecological Appraisal	Not required, see Bat survey
Preliminary Roost Assessment	Bat Survey Magnet Cardiff Interstrand V3-0
Energy Statement	To follow in full application
Construction Environmental Management Plan	To follow in full application
Noise Assessment/Acoustic Report	REP01 Noise Impact Assessment
Adaptability Statement	To follow in full application

Waste Management Plan	To follow in full application
Soil Assessment	Not required

Pre Application Consultation

Section 17 of the Act and the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) as amended by the 2016 Order requires formal Pre-Application Consultation to be carried out for all major developments. A major development is defined as residential scheme that includes more than 10 houses and as such this scheme is subject to this requirement.

Guidance on conducting the pre-application consultation requirements within the Act has been provided by the Welsh Government set out in Article 1 of the Town and Country Planning DMPWO (Amendment) 2016 'Guidance on Pre-application Consultation'.

As the current proposals constitute a Major Development formal Pre Application Consultation will be required. The results of that process will be included in this section when a full planning application is made.

A formal PAC Report will also be included in the application as required by the relevant legislation.

5.0 Environmental Sustainability

The Proposal has been designed with its impact on the environment a key factor. The sustainability of the building in construction and use has been considered.

Site Location

As demonstrated throughout this document the site is in an inherently sustainable location and has good access to pedestrian and cycle routes and is close to a range of local facilities. More details are included in the Site Analysis and Access Statement sections.

Car parking levels are low to reduce emissions, improve air quality and to encourage the use of alternatives to the private car.

Materials

The proposed materials for the Proposal have been sourced with sustainability in mind. The walls, floors and internal finishes all achieve an A or A+ rating in the Green Guide to Specification (published by BRE).

Energy Efficiency

The proposal will seek to contribute to energy efficiency and carbon reduction by utilising appropriate plant and building materials.

The dwellings will all be designed to achieve SAP A ratings as required to meet Welsh Government design standards for affordable housing.

U values will be in excess of Building Regulations to promote a fabric first approach to efficiency.

Modern air source (internal) heating systems or direct electric powered by PV will be employed within individual dwellings to provide efficient and economical solutions for residents.

MHVR ventilation systems will be used to improve energy efficiency,

Energy efficient lighting will be utilised throughout the dwellings.

PV solar panels will be installed to provide carbon free electricity to residents.

Devices that limit water usage will be used in the apartments.

Waste

Dedicated refuse areas are provided within the building and site for the storage of both general waste and recyclable waste. A new bin store area is proposed to house both waste and recycling bins waiting for collection by the Local Authority or private collection depending on availability.

Waste Minimisation Strategy

It is key that we ensure finite resources are used responsibly by minimising waste, maximising recycling opportunities and by promoting the use of materials with less environmental impact.

Waste minimisation will be considered in all stages of the development, from demolition through to construction. Some of the measures at all stages have been listed below.

- The use of Modern Methods of Construction (MMC) in line with Welsh Government policy
- Use of materials that could be re-cycled in the future including masonry, brick and aluminium,
- Standard components and opening sizes used where possible to minimise off-cuts and wastage.
- High quality robust materials used to minimise need for future replacement and future waste,
- Promote responsibly sourced, low embodied energy and local sourced components where possible to minimize environmental impact and wasted energy use in manufacture and transport,
- Investigate using materials with a higher recycled content, such as aggregates, bricks, blocks, mortar etc.
- On site minimization of site waste and promote recycling on site during construction,
- Promote recycling ethos for building users by providing large, well located, bin store areas with easy access for residents and collection services.

Drainage

A SUDs drainage scheme will be utilised to minimise run of rates from the development.

Drainage designs will be prepared for SUDs/SAB approval prior to commencement of works.

6.0 Access Statement

This section explains how the proposed access arrangements make reasonable provision for all users have equal and convenient access into the site from its boundaries, within the site itself and also within the building.

The following legislation and guidance have been referred to during the design process and have influenced the design in terms of access:

- The Disability Discrimination Act 1995
- Building Regulations Part M (Access to and Use of Buildings)
- BS8300:2001 (Design of Buildings and their approaches to meet the needs of disabled people)

A summary of the site's accessibility in terms of public transport links, walking and cycling connections and access to local facilities is included below.

As there are no significant changes to the access arrangements and internal areas there is limited scope to affect behaviour and transport modes. However, the site's location and lack of car parking will promote cycling and walking for prospective residents.

Movement to and from the Site

This section explains how the proposed access arrangements make reasonable provision for all users have equal and convenient access into the site from its boundaries, within the site itself and also within the building.

The following legislation and guidance have been referred to during the design process and have influenced the design in terms of access:

- The Disability Discrimination Act 1995
- Building Regulations Part M (Access to and Use of Buildings)
- BS8300:2001 (Design of Buildings and their approaches to meet the needs of disabled people)

A summary of the site's accessibility in terms of public transport links, walking and cycling connections and access to local facilities is included in the Site Analysis section which is expanded upon below.

The Proposal is designed to be accessible to all both to and within the site. The following sections set out how the site is served by a range of transport options.

The impact on local infrastructure, particularly vehicular access to the site, will not be affected to any great degree as limited off street parking is proposed as part of the

application. The site is in the Central Parking Area and is deemed a sustainable location as confirmed by the sustainability score set out below.

The Parking numbers are in accordance with the Parking Standards set out in the Managing Transport Impacts SPG, which allow a maximum of one space per dwelling.

Given the low level of parking and the connectivity of the site it is anticipated that traffic movements to and from the site will be lower than the previous commercial use, with associated benefits for local infrastructure and air quality.

The following sections set out the current situation and any measures proposed as part of the proposal to reduce dependence on the private car.

Pedestrian Access

The site is fully accessible by pedestrians via adopted footpaths along East Tyndall Street which connect the site to the wider footpath network within the local area and the city generally.

Given the reasonably good pedestrian links there are no additional proposals necessary to increase accessibility for pedestrians other than the ongoing promotion of walking as an environmentally friendly and healthy alternative to the private car.

In addition, the City Centre, Splott Road Local Centre and Clifton Street District Centre are within a reasonable walking distance and is also accessible by bus and train from close to the site.

There are many employment opportunities in the area generally and the City Centre all within easy walking distance or accessible by public transport.

A wide range of local amenities are available within a short walking distance along with many options for Public Transport (see below).

Cycle Access

The site is easily accessible by cycle via the main road network. There are dedicated traffic cycle tracks within a short distance of the site. These connect to the wider cycle path network within and around Cardiff. The site is in ideal location for accessibility by cycle.

Cycle Storage

Cycle storage for the development in accordance with the Sustainable Travel SPG, is located in a secure cycle store inside the main apartment block as described in the Site Analysis and in accordance with the Managing Transport Impacts SPG.

Vehicle Access

Although limited parking is proposed given the inherently sustainable location, the site is well served for vehicle access with all local roads being suitable for both car and commercial vehicle access and connected directly to major roads providing access to the City Centre and the wider regional area.

Public Transport Access

The site is well served by Public Transport. There are a number of bus stops within a short distance of the site as shown on the image opposite (bus stops orange circles)

These stops give access to range of bus routes to Cardiff City Centre and the wider public transport network.

The site also within an 1200m walk to Cardiff Queen St train station which gives access to Cardiff Central Station and a number of Valley lines and the forthcoming Cardiff Metro system.

All of these public transport facilities are well within recognised walking distances as set out in national guidance documents as described previously in this document.

Summary

As can be seen from the above the site is in very well connected by pedestrian, cycle and public transport means and is in an inherently sustainable location. Given this, limited parking is proposed for the scheme, which is line with Local and National Planning Policy of encouraging a move away from the private car as a primary means of transport.



Movement within the site and buildings

The building is generally accessible to all.

A level approach from the site entrance is provided to all dwellings and apartment block entrances.

Suitable drop kerbs are provided at the site entrance and within the site to accommodate users with limited mobility and wheelchair users.

All external doors and entrances have level thresholds to allow access by disabled staff and visitors.

A Part M disabled lift is provided to the apartment block to ensure safe access for all to all.

All internal doors will be appropriately sized to accommodate disabled users and will be finished to ensure they are visible to those with partial sight.

The building will be designed to comply wherever possible with the requirements of Part M of the Building Regulations to ensure that the requirements of the Disability Discrimination Act can be met.

7.0 Summary and Conclusions

The current proposal is for the development of 62 affordable residential units in a sustainable location on previously developed land in an area of identified housing need.

The key elements of the proposal can be summarised as follows:

- The site is in an accessible and sustainable location with easy access to many local facilities and public transport option,
- The proposal will provide a large number of affordable housing units to meet a clearly identified need within a well-established community,
- The proposal has minimal impact on adjacent occupiers, both residential and commercial, and has no impact on their amenity,
- The location of the site and the low level of parking proposed will encourage the use of public transport and other alternatives to the private car.
- The proposals respect the setting of the adjacent Listed Buildings,
- The proposals provide suitable external amenity space for residents within a development that adheres to the key Placemaking principles,
- The proposal will significantly increase biodiversity within an urban residential setting,
- The buildings will be sustainable in their construction and operation.
- The proposal is in compliance with all policies identified in National Planning Guidance, the adopted Local Plan and Supplementary Planning Guidance.

For these reasons it is felt that this is an appropriate development that will meet with the approval of the Planning Officers and the Local Authority Planning Committee.