

Planning Statement

The Former New Penn Public House, Llanedeyrn

May 2023

amity

planning consultants

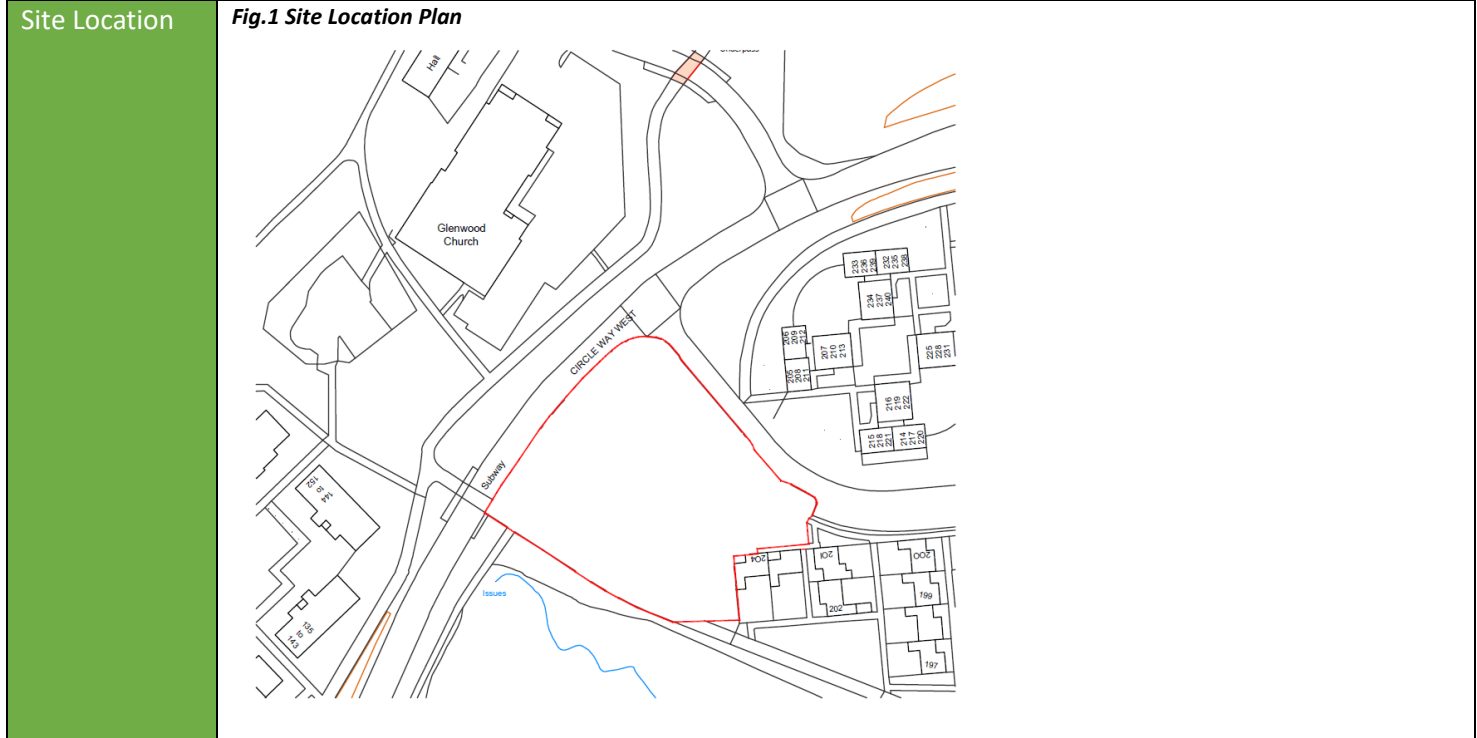


Introduction

Client This statement has been prepared on behalf of Cardiff Council (Housing Development & Neighbourhood Regeneration).

Scope This statement accompanies a full planning application for the proposed demolition of the former New Penn Public House and the redevelopment of the site to accommodate 11no. affordable dwellings with highway infrastructure, landscaping works, and green infrastructure.

Site Details



Site Description The Site is located in the north-west of the neighbourhood of Llanedeyrn. It comprises of a corner plot between Circle Way West and Brynfedw. The bulk of the Site encompasses of the former New Penn public house (which closed for trading in 2020), together with associated car parking and outside seating areas. The Site also encompasses a separate area of cul-de-sac highway and car parking immediately to the south-east of the public house which is accessed from Brynfedw.

The former New Penn public house comprises of a sprawling complex of single and two storey buildings set back from Circle Way West behind a designated car parking area and gravelled outside seating area which dominate this frontage. The existing vehicular access to the site is from Circle Way West. The majority of the Site comprises of hardstanding or structures, however there are grass verges with mature trees between the site and the public highway. A low hedge also borders the north-eastern edge of the site.

The estates in Llanedeyrn were developed with a Radburn street layout which comprises a network of footpaths segregated from the highways. There is consequently no footpath to either Circle Way West or Brynfedw along the Site frontage.

In terms of topography, the Site for the most part falls gently from the north-west (Circle Way West) to the south-east. The south-western boundary of the Site however falls steeply down to an existing footpath.

	<p>The Site is located in a primarily residential area. To the north-west of the Site, on the opposite side of Circle Way West, is Glenwood Church Centre & Wellbeing Space. To the north-east, a cluster of four blocks of flats. To the south-east, parking bays and semi-detached houses. To the south-west, a public footpath immediately adjacent to the site and woodland that buffers the housing estate of Brynfedw from Pennsylvania estate</p> <p>Llanedeyrn is a well-serviced district of Cardiff and therefore the Site is in close proximity to a wide range of services, facilities and amenities, with extensive areas of woodland and green space maintained in the plan of the estate.</p>
<p>Development Proposals</p>	
<p>The Scheme</p>	<p>The application seeks Full planning permission for the following:</p> <ul style="list-style-type: none"> • Demolition of the former New Penn Public House and associated buildings. • 100% affordable housing scheme comprising a total of 11 dwellinghouses. • Highway works for improving the existing infrastructure and car parking provision • A landscaping strategy including the implementation of SuDS and improvement of existing open space areas in the vicinity of the site. • Green infrastructure strategy for the retention and protection of the relevant assets on the site; and set-off measures for the loss of some assets and enhancement of habitats and biodiversity where possible.
<p>Relevant Planning Policy</p>	
<p>Approach</p>	<p>In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the development plan (in this case the adopted Cardiff Local Development Plan) unless material considerations indicate otherwise.</p> <p>The Development Plan for the area comprises of the Cardiff Local Development Plan (LDP) 2006 – 2026 together with Future Wales – The National Plan 2040. Relevant material considerations in this instance are identified as including Planning Policy Wales, various Technical Advice Notes, and adopted Supplementary Planning Guidance.</p>
<p>Local Development Plan</p>	<p>The adopted LDP provides the statutory framework for the development and use of land within Cardiff over the Plan period (2006-2026). The policies and details contained within this LDP is used by Cardiff Council to guide and control development and provide the statutory local policy context for determining planning applications.</p> <p>The site is within the settlement boundary for Cardiff and not subject to any policy designation in accordance with LDP Proposals Map and Constraints Map which both form part of the Adopted LDP.</p> <p>Notwithstanding this, a range of policy designations have been identified in the site context on the above-mentioned maps and other Council’s designations. The following designations are of relevance to the proposed development:</p> <ul style="list-style-type: none"> • The adjacent woodland and the other woodland further north-east are known as Llanedeyrn Woodlands Complex, and classified as ‘Site of Importance for Nature Conservation’ (Source: LDP Constraints Map). • The woodland further north-east is designated as a River Corridor (Policy N3) (Source: LDP Proposals Map)

- The adjacent woodland (Pennsylvania Woodland), the green area opposite the road (Glenwood Open Space), and two green areas further north-east (Wern Goch West Open Space – South; and Parc Coed Y Nant) are designated Parks and Sport Areas. Glenwood Open Space also has Play Facilities (Source: Cardiff Council Parks).

Fig.2 Site Location and Cardiff Council Parks Designations (Source: Cardiff Council Parks)





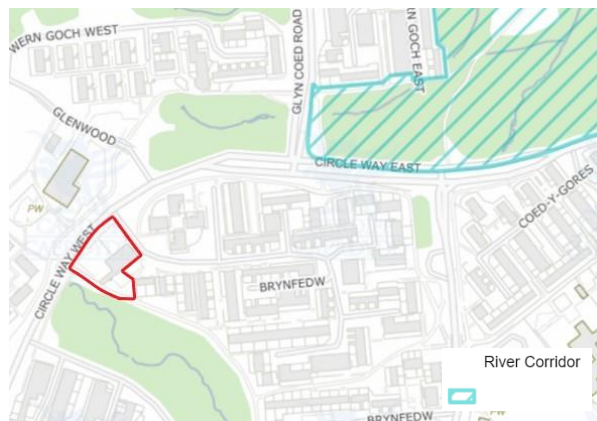
 Parks and Sports Areas
 Playground

Fig.3 Site Location and SINIC (Source: LDP Constraints Map)



Site of Importance for Nature Conservation
 93 - Llanedeyrn Woodlands Complex

Fig.4 Site Location and River Corridor (Policy ENV4) (Source: LDP Proposals Map)



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

Policy KP5: Good Quality and Sustainable Design

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

The following criteria are considered relevant to the development proposals:

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

Policy KP6: New Infrastructure:

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

“Essential / Enabling Infrastructure:

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

“Necessary Infrastructure:

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

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

Policy KP7: Planning Obligations

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

Policy KP8: Sustainable Transport

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

The relevant requirements in this instance are as follows:

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

Policy KP12: Waste

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

Policy KP13: Responding to Evidenced Social Needs

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

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

Policy KP15: Climate Change

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

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

Policy KP16: Green Infrastructure

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

Policy H3: Affordable Housing

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

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

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

The policy highlights that "affordable housing will be sought to be delivered on-site in all instances unless there are exceptional circumstances". The supporting text to this policy clarifies that "in negotiating affordable housing, each proposal's actual contribution will depend on that scheme's capacity for provision. This will ensure that the affordable housing contribution in itself will not make the scheme unviable". The 'Planning Obligations' Supplementary Planning Guidance (SPG) provide further guidance on how to provide affordable housing contributions where provision cannot be delivered on site.

Policy H6: Change of Use or Redevelopment to Residential Use

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

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

Policy EN11: Protection of Water Resources

Policy EN11 states that "development will not be permitted that would cause unacceptable harm to the quality or quantity of underground, surface or coastal waters."

Policy EN12: Renewable Energy and Low Carbon Technologies

This policy identifies that "development proposals are required to maximise the potential for renewable energy". It expands further for development in major and strategic sites. It also recognises the importance of minimising carbon emissions associated with the heating, cooling and power systems within the development.

Policy T1: Walking and Cycling

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

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

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

Policy T5: Managing Transport Impacts

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

Policy T6: Impact on Transport Networks and Services

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

Policy C2: Protection of Existing Community Facilities

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

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

Policy C3: Community Safety/Creating Safe Environments

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

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

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

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

The policy identifies that “the amount of open space provision generated by a housing proposal will be assessed in relation to its type and density. Consideration will also be given to the availability and adequacy of existing functional open space within the surrounding area.”

Policy W2: Provision for Waste Management Facilities in Development

This policy sets out that “where appropriate, provision will be sought in all new development for facilities for the storage, recycling and other management of waste”.

Supporting text provides further guidance on how to achieve sustainable waste management. “All developments will be to provide:

- On-site waste, recycling and composting, separation and storage facilities;
- Communal waste, recycling and composting, separation and storage facilities for larger developments; and,
- Access arrangements for refuse vehicles and personnel for collection purposes”

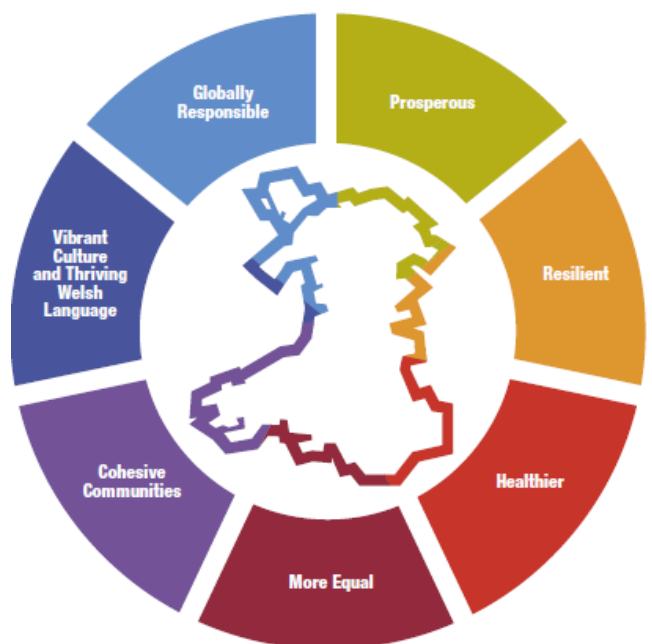
Future Wales:
The National
Plan 2040

Future Wales: The National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It forms part of the development plan and provides a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

As described above, the Welsh development framework has been designed incorporating the principles of sustainable development at its core. This comes as a result of the Well-being of Future Generations (Wales) Act 2015 ('the Act') that gives a legally-binding common purpose – the seven well-being goals – to the public sector to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.

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

Fig.5 The Seven Goals of the Well-being of Future Generations (Wales) Act 2015



- Policy 1 – Where Wales will Grow
- Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking
- Policy 7 – Delivering Affordable Homes
- Policy 8 – Flooding
- Policy 9 – Resilient Ecological Networks and Green Infrastructure
- Policy 11 – National Connectivity
- Policy 12 – Regional Connectivity

Planning Policy Wales

Planning Policy Wales (11th Edition, February 2021) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions.

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

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

Fig. 6 PPW Themes Collectively Contribute to Placemaking (extract from PPW Edition 11)



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

1. STRATEGIC & SPATIAL CHOICES

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

Good Design

Good design is one of these fundamental choices to creating sustainable places where people want to live, work and socialise. PPW 11 sets out five key aspects of good design which are essential to make placemaking happen:

1) *Access and Inclusivity*

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

2) *Environmental Sustainability*

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

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

3) *Character*

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

4) *Community Safety*

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

5) *Movement*

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

Previously Developed Land

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

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

2. ACTIVE & SOCIAL PLACES

Transport

Paragraph 4.1.11 sets out that “development proposals must seek to maximise accessibility by walking, cycling, and public transport, by prioritising the provision of appropriate on-site”. In this respect, “the sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications” as per Paragraph 4.1.14. The Welsh Government policies set out the sustainable transport hierarchy which is, in this order, from walking and cycling, public transport, ultra-low emissions vehicles to other private motor vehicles.

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

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

Housing

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

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

3. DISTINCTIVE & NATURAL PLACES

Green infrastructure

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

	<p>Paragraph 6.2.5 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that “with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places”. It is also advised that “there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents”.</p> <p>Paragraph 6.4.21 establishes that “planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible”.</p>
Technical Advice Notes	<p>Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:</p> <ul style="list-style-type: none"> • TAN 2: Planning and Affordable Housing (June 2006) • TAN 5: Nature Conservation and Planning (September 2009) • TAN 12: Design (March 2016) • TAN 18: Transport (2007)
Supplementary Planning Guidance	<p>Supplementary Planning Guidance (SPG) provides further detail on certain policies and proposals contained within Cardiff’s Development Plan. They help ensure that certain policies and proposals are better understood and applied effectively.</p> <p>SPG do not have the same status or weight as adopted Development Plan policies. However, the Government advises that they may be taken into account as a material consideration in determining planning applications.</p> <p>Of particular relevance to the development proposals are the following SPG documents:</p> <ul style="list-style-type: none"> • Infill Sites (November 2017) • Managing Transportation Impacts (Incorporating Parking Standards) (July 2018) • Planning Obligations (January 2017) • Residential Design Guide (January 2017) • Waste Collection & Storage Facilities (October 2016)
Planning History	
	There is no planning history of relevance to the proposals.
Engagement	
Pre-Application Enquiry PA/22/00173	The proposals have been subject to detailed pre-application engagement with the Local Planning Authority, the feedback from which has been taken into account in finalising the application. This is detailed in the relevant sections of the statement.
Community Engagement	The proposals have been subject to non-statutory community engagement, including two public consultation events. <i>Section to be completed following completion of PAC Consultation.</i>

PAC Consultation	Section to be completed following completion of PAC Consultation.
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Analysis

Principle of Development	<p>The development proposals seek to replace the former New Penn Public House with new affordable housing development. The Site lies within the settlement boundary and is unallocated for any specific use within the adopted LDP. The principle of the development of the Site for affordable housing therefore falls to be assessed against the following LDP policies:</p> <ul style="list-style-type: none"> • Policy C2 which relates to existing community facilities, and only allows such facilities to be lost to redevelopment where certain criteria are met. • Policy H6 which relates to the redevelopment of redundant land or premises to residential use. • Policy H3 which relates to affordable housing delivery over the plan period. <p>Policy C2 - Community Facilities</p> <p>LDP Policy C2 states that the loss of a community facility can be justified if:</p> <ol style="list-style-type: none"> i. <i>An alternative facility of at least equal quality and scale to meet community needs is available or will be provided within the vicinity or;</i> ii. <i>It can be demonstrated that the existing provision is surplus to the needs of the community</i> <p>Having regard to the identified criteria:</p> <p><u>An alternative facility of at least equal quality and scale to meet community needs is available or will be provided within the vicinity</u></p> <p>The former public house would previously have acted as gathering place for the local community and been available for hire for gatherings and events. A Community Facilities Assessment has been undertaken in order to identify alternative local facilities which would serve the same or similar purpose to the former Fairwater Social Club. This is set-out below and identifies that a wide range of alternative facilities exist in the immediate area, including alternative public houses, which could fully or partially fulfil the role that the former social club served to the local community.</p> <p>Fig.6 Community Facilities Assessment</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #4CAF50; color: white;"> <th style="padding: 5px;">Name of Community Facilities</th> <th style="padding: 5px;">Distance from the site (in metres)</th> <th style="padding: 5px;">Length of journey by foot (in minutes)</th> <th style="padding: 5px;">Length of journey by bicycle (in minutes)</th> </tr> </thead> <tbody> <tr><td style="text-align: left; padding: 5px;">Glenwood Church & Wellbeing Space</td><td style="padding: 5px;">30</td><td style="padding: 5px;">1</td><td style="padding: 5px;">1</td></tr> <tr><td style="text-align: left; padding: 5px;">Springwood Primary School</td><td style="padding: 5px;">300</td><td style="padding: 5px;">3</td><td style="padding: 5px;">2</td></tr> <tr><td style="text-align: left; padding: 5px;">Arclyn Events Space</td><td style="padding: 5px;">300</td><td style="padding: 5px;">3</td><td style="padding: 5px;">2</td></tr> <tr><td style="text-align: left; padding: 5px;">All Saints Church Hall</td><td style="padding: 5px;">700</td><td style="padding: 5px;">8</td><td style="padding: 5px;">3</td></tr> <tr><td style="text-align: left; padding: 5px;">Powerhouse Hub Community Centre</td><td style="padding: 5px;">800</td><td style="padding: 5px;">11</td><td style="padding: 5px;">5</td></tr> <tr><td style="text-align: left; padding: 5px;">Glyncoed Primary School</td><td style="padding: 5px;">900</td><td style="padding: 5px;">11</td><td style="padding: 5px;">7</td></tr> <tr><td style="text-align: left; padding: 5px;">Retreat Hotel & Restaurant</td><td style="padding: 5px;">900</td><td style="padding: 5px;">12</td><td style="padding: 5px;">6</td></tr> <tr><td style="text-align: left; padding: 5px;">Pentwyn Leisure Centre</td><td style="padding: 5px;">1000</td><td style="padding: 5px;">13</td><td style="padding: 5px;">6</td></tr> <tr><td style="text-align: left; padding: 5px;">Eat Out Vegan Wales</td><td style="padding: 5px;">1100</td><td style="padding: 5px;">13</td><td style="padding: 5px;">7</td></tr> <tr><td style="text-align: left; padding: 5px;">St David's Primary School</td><td style="padding: 5px;">1200</td><td style="padding: 5px;">14</td><td style="padding: 5px;">7</td></tr> </tbody> </table>	Name of Community Facilities	Distance from the site (in metres)	Length of journey by foot (in minutes)	Length of journey by bicycle (in minutes)	Glenwood Church & Wellbeing Space	30	1	1	Springwood Primary School	300	3	2	Arclyn Events Space	300	3	2	All Saints Church Hall	700	8	3	Powerhouse Hub Community Centre	800	11	5	Glyncoed Primary School	900	11	7	Retreat Hotel & Restaurant	900	12	6	Pentwyn Leisure Centre	1000	13	6	Eat Out Vegan Wales	1100	13	7	St David's Primary School	1200	14	7
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The Discovery Inn	1200	17	7
St Bernadettes Primary School	1600	19	11
Lakeside Primary School	1700	20	8
Cardiff Golf Club	1700	21	10
Café 19	1800	21	10
Christ Church Scout Hall	1900	24	10
Three Arches Public House	1900	25	11
Coed y Gores Harvester	1900	18	7
Jivey's Cafe	2000	21	11
Snack Shack Cardiff	2000	26	14

The finding findings of the assessment therefore indicate that the community benefit from alternative public houses and other establishments to meet community needs within the locality. It is concluded that criteria (i) of Policy C2 is met.

It can be demonstrated that the existing provision is surplus to the needs of the community

In respect of criteria (ii), the New Penn has been vacant and marketed since its closure in 2020 without any viable interest having been expressed in bringing it back into use a public house. expressed any Cardiff Council purchased the site to bring it back to use for community needs. The unfavourable trading conditions which likely led to the decision of the previous operators to cease operations and market the premises for sale is representative of similar conditions seen across the industry, and evidence of an under-used community resource. Furthermore the community engagement process has not identified any over-riding requirement for the public house to be reinstated as a community facility. It is consequently concluded that the former public house is surplus to the needs of the community, and that criteria (ii) of Policy C2 is met.

Policy H6 - Change of Use or Redevelopment to Residential Use

Policy H6 identifies that the change of use of redundant premises or redevelopment of redundant land for residential purposes will be permitted where:

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

Having regard to the identified criteria:

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

This is dealt with under Policy C2 above with the conclusion that there is no overriding need for the facilities.

The resulting residential accommodation and amenity will be satisfactory

This is dealt elsewhere in this document with the conclusion that the development would deliver a satisfactory quality of accommodation for future occupiers.

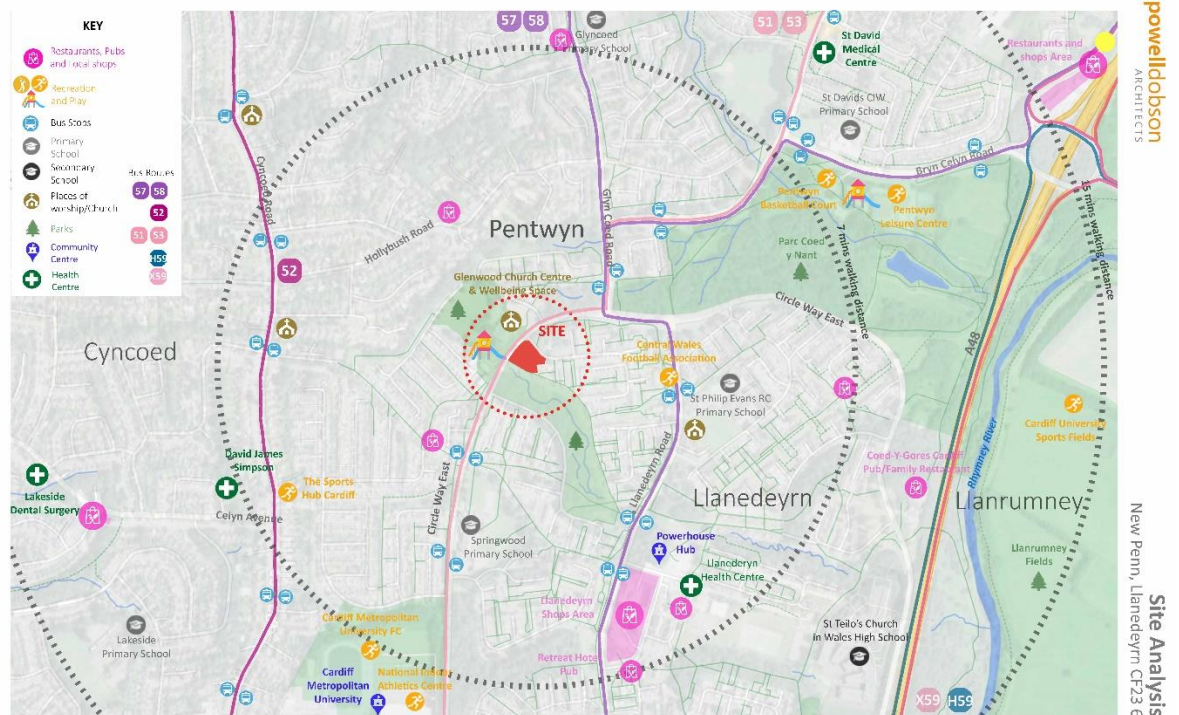
There will be no unacceptable impact on the operating conditions of existing businesses

There are no commercial businesses currently operating in the immediate vicinity of the Site, and the proposed residential development of the Site would certainly not have an adverse impact on the operating conditions of any businesses. Indeed, the additional residential accommodation would benefit any local service businesses through increased trade.

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

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 a short distance from the Site. The Welsh Government's Active Travel (Wales) Act 2013 recognises the importance of integrating transport and land use planning. It encourages the use of land use planning tools, such as pedestrian-friendly street design, to create more sustainable communities.

Fig.7 Sustainability Appraisal (Source: Pre-Application Design Document, by Powell Dobson)



The local amenities within a 15- to 30-minute walking radius are shown in the diagram above. The Site is in a highly sustainable location within Cardiff. Thus, the future occupiers of the dwellinghouses will have easy access to bus services (routes 51, 53, 57, 58 and C1) and pedestrian/cyclist infrastructure through the large network of public footpaths. The development proposals are aimed to enhance the existing infrastructure for active travel by the addition of surface level crossings and new pedestrian connection within the site linking with adjoining footpaths.

Pentwyn Leisure Centre has recently reopened following completion of refurbishment works. In addition, there are plenty of community facilities available for the future house occupiers (see Figure 6 above).

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

The previous uses of the site are such that it should not entail any potential health hazard to the future occupiers of the houses from land contamination. In any case, further assessment can be carried out subject to any requirement made by Cardiff Council's Environment Health Team.

Policy H3 – Affordable Housing

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

Moreover an acute housing need specific to the ward of Pentwyn and Llanedeyrn has been identified, which is unlikely to be met in the near future through existing allocations/commitments.

The 11 new affordable homes which would be delivered as a result of the proposed development would make a significant contribution to addressing the acute shortfall in affordable housing delivery within Cardiff as a whole and, specifically, the ward of Pentwyn and Llanedeyrn. The development would therefore fully comply with LDP policies KP13 and H3 and the delivery of 11 affordable housing units in the face of acute shortfalls and under-delivery should be afforded significant weight.

In summary, with regard to the principle of the site's redevelopment for housing:

- The previous public house is surplus to the needs of the community, which is well served by alternative facilities, in accordance with the requirements of LDP Policy C2.
- In addition, the scheme would be sustainably located, would provide a good quality of accommodation, would provide a positive contribution towards the operating conditions of local businesses, and would not result in any adverse contamination risks in accordance with the requirements of LDP Policy H6.
- The development would help meet an acute need for affordable housing in both the ward and the wider city which accords with LDP Policy H3 and weighs heavily in favour of the proposed development.

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

Transport and Movement

Active travel has been at the heart of the scheme's design, with opportunities to maximise pedestrian and cycle connectivity for both existing and future residents explored at every opportunity. A road level pedestrian crossing on Circle Way West is offered as an alternative to the existing sub-way. The existing informal east-west pedestrian ling along the Circle Way West frontage will be formalised with a new footpath and stepped access, which will connect with the underpass, the new pedestrian crossing over Circle Way West, and footpath to Brynfedw Road. To facilitate this the existing vehicular access from Circle Way West will be stopped up.

A Highway Strategy Plan by Vectos details the possible new Zebra crossing to Circle Way West which will connect to the existing routes to the northwest of the site. This will complement the existing underpass connection to the south and provide a direct link to the local play area and Glenwood Church Centre on the opposite side of Circle Way West. The positioning of the crossing takes into consideration the forward visibility requirements on Circle Way West and the preferred position is located outside of the visibility splay of Brynfedw. Should the signed speed limit on Circle Way West be

	<p>reduced from 30mph to 20mph, there is an option for the Zebra crossing to move northeast on Circle Way West. A speed reduction would reduce the left-hand visibility splay for Brynfedw allowing the Zebra crossing to be sited closer to this junction. The proposed Zebra crossing location will be discussed with Cardiff Council highway officers and would be subject to a Stage One Road Safety Audit as part of a Section 106 agreement.</p> <p>Vehicular access to the proposed development would be via a reconfiguration of the existing adopted highway and parking area to the rear of the public house. The 5 no. existing, unallocated bays located off this highway would be improved and retained for use by existing residents. The remainder of the highway and parking area would however be incorporated into the development site.</p> <p>It is intended that parking is provided at a ratio of 1 space per dwelling and therefore 11 spaces will be provided. It is considered that this level of provision is suitable given the accessibility of the site by alternative transport modes. In addition, it is being explored to provide 3 new parallel parking bays on Brynfedw which will partially mitigate the loss of parking currently associated with the public house.</p> <p>The final level of car and cycle parking provided across the site will be calculated on the basis of the final development mix and the Cardiff Council parking standards in place at the time of the reserved matters process.</p> <p>Whilst the site is not located with the Central Parking Area for the purposes of Cardiff's adopted SPG on Managing Transportation Impacts (Incorporating Parking Standards) (July 2018), it is highly sustainable in its location (see section of 'Land Use Planning' above). The proximity to a range of services and facilities in a reasonable walking distance will discourage the use of private vehicles and therefore the modes of active travel in conjunction with public transport might highly likely be the preferred mean of transportation for the future residents on the site. Furthermore, the car ownership levels will be evidentially lower than market housing given the social housing tenure of the scheme.</p> <p>It is therefore concluded that the proposed car parking provision of 1 space per property is appropriate to cater the demand of parking from the future occupiers of the houses without compromising off-street parking demand from other neighbours in the area.</p>
<p>Trees and Ecology</p>	<p>The application is supported by an Arboricultural Constraints & Opportunities Report incorporating a Tree Location and Constraints Plan and Tree Survey Schedule prepared by Wardell Armstrong. The report provides an objective assessment of the constraints and opportunities posed by trees and hedgerows within the site and its context including detailed information about the trees on the site.</p> <p>The report identifies that none of the trees within, or immediately adjacent to, the Site are veteran trees or protected by a TPO. The report nonetheless identifies a number of Category B and C trees within the confines of the Site. The development proposals have been evolved with careful regard to the existing trees on the Site. The existing trees and hedgerow onto Circle Way West and the corner with Brynfedw Road are proposed to be retained and integrated into the development and will accordingly be protected during construction. Only two ash trees and one grey alder on the southern end of the site (T1, T2 and T6) together with a single tree on the northern corner (part of G1) will need to be removed to facilitate the re-development. All of them have been classified as 'C category' which means lower quality due to their condition or lower amenity value. It is recommended that trees proposed for retention be protected by way of ring-fencing during construction works in accordance with BS 5837:2012 (the British Standards Institution, 2012). Where there are impacts within retained tree and hedgerow RPAs, mitigation measures will be proposed at a later stage of the planning process.</p>

	<p>A Landscape Strategy prepared by Soltys Brewster identifies strategic planting proposals for the development. This includes proposals for compensatory tree planting within the parking courtyard area and adjacent to Brynfedw Road (11 no. trees are indicatively shown), hedgerow planting to extend the existing hedgerow to Circle Way West, and shrub and grass planting around the proposed properties and as part of the SABs features.</p> <p>In terms of habitats and biodiversity, the application is supported by a Preliminary Ecological Appraisal (PEA), Bat Survey Report, and Bat Hibernation Survey Report, all prepared by Wardell Armstrong.</p> <p>The PEA provides an initial assessment of the likely presence of ecological receptors within or near the site that could be subject to adverse effects arising from the proposed development. Provisional mitigation measures and enhancement opportunities are also proposed. The trees were identified as having negligible potential to support bat roosting however the public house had a moderate bat roost potential, and consequently further targeted species surveys were recommended. European hedgehog was also identified as potentially being present on site, but the loss of habitat would not significantly affect this mobile species. Ecological enhancement were recommended by way of bird nest boxes, native species in the landscaping scheme, and SUDS/biodiversity-friendly drainage, among other measures.</p> <p>Further to its identification in the PEA as having moderate bat roost potential, the public house was subject to a dusk emergence survey in July 2022, and a separate dawn reentry survey in August 2022, the results of which are presented in the Bat Survey Report. Three common pipistrelle bats and one soprano pipistrelle bat were observed emerging or re-entering the building during the July/August 2022 emergence/re-entry surveys. The building is now classified as containing three, confirmed low status, non-breeding summer day/transitional roosts for common and soprano pipistrelle bats. As such, the demolition of the building can only be undertaken following approval of a bat mitigation licence from Natural Resources Wales.</p> <p>A separate Bat Hibernation Report details the results of the Hibernation Surveys undertaken in the basement of the public house between 1st December 2022 to 20th February 2023. The results of the Hibernation Survey suggest the absence of hibernating bats from the basement of the public house, however the potential for hibernating bats remains. While no hibernating bats were identified during the bat hibernation surveys, the building still provides suitable hibernation potential for bats. Due to this, precautions should still be taken prior to and during any development works. This includes sealing any entrances to the basement prior to November 2023 to prevent the winter colonisation by bats. It is also recommended that works be undertaken prior to November 2023 or after April 2024 (outside hibernation season). Should demolition not occur, and the internal door, as well as external steel grates that provide entry to the basement of building B1 be left unsealed, hibernation surveys should be repeated in the winter of 2023-2024 prior to any demolition.</p> <p>It is concluded that the proposals responds appropriately to the existing green infrastructure and ecology receptors of the site and its surroundings. Mitigation and enhancement measures have been also set out to compensate any loss and improve the current habitats and species.</p>
Flood Risk and Drainage	<p>The site lies in Flood Zone A for the purposes of TAN15. As such the justification test is not applicable and there is no need to consider flood risk from rivers and seas any further.</p> <p>With regard to surface water flooding five gullies have been identified on Site, a single gully identified on the Site periphery, and a tank identified to the south. There is high risk of flooding from surface water on the southern footpath adjoining the path and along the minor watercourses that runs across the woodland nearby.</p>

	<p>The requirement to comply with SABs legislation will ensure that surface water is managed in the most sustainable and efficient manner. The proposed Drainage Strategy prepared by Cambria utilises the Site's natural topography and the presence of an adjacent watercourse. The results of the soakaway tests confirm that traditional soakaway systems are not suitable for the redevelopment. The Site slopes north-south and water will be discharged offsite from the southern end of the Site into the stream.</p> <p>To control water flow, each building within the development will have a separate bioretention feature that will connect to more expansive features that serve the entire site. The design ensures that there will be no runoff from the site for storms producing up to 5mm of rainfall.</p> <p>A French drain will be installed to the north to collect runoff from the path, while the footpath and parking bays to the south will direct runoff towards a swale situated at the southeast of the site. The swale will be sized to meet interception criteria. Permeable paving will be used across the private road and parking areas, with water storage in the subbase. The proposed overland flow will be discharged into a nearby watercourse at a controlled rate.</p> <p>In summary, the design of development will incorporate a SUDS-based approach to manage flooding from surface water, the details of which will be subject to further technical assessment and the SAB process.</p>
<p>Design and Layout</p>	<p>A Design & Access Statement produced by Powell Dobson Architects accompanies this application which details full compliance of the scheme with the relevant design standards. This document demonstrates how placemaking has been placed at the heart of the scheme's evolution, informed by robust analysis of the Site and its context.</p> <p>The re-development of the vacant site has been an opportunity to create high-quality public realm. In addition to the movement routes, the prominent trees and hedge onto the public roads will be retained for ecology, climate change and sense of place purposes. The landscaping scheme will include further green features and will be inter-connected with the ecology network across the area. The implementation of SuDs will allow the most efficient and sustainable way of surface water management and also provide opportunities for biodiversity enhancement.</p> <p>The dwellings will be primarily two-storey, with some 2 ½ storey units fronting Circle Way West. Other than a terrace of three units fronting Circle Way West, all the properties will be semi-detached. A number of design options were explored, as detailed within the Design and Access Statement, which were further informed by Design Commission for Wales review and Secure by Design recommendations. The scheme design has responded to the objective of achieving the most efficient use of the land. The net development density (37dph) represents an appropriately efficient use of land having regard to the Site's context.</p> <p>The layout has been designed with careful regard to Cardiff policies and guidance, including amenity space standards. In this regard the majority of the dwellings would exceed the 50sq.m SPG guideline standards. As a result of the constrained nature of the Site however a small number of the gardens (4no.) would be slightly under this guideline standard (between 40 and 49sq.m). These gardens would nonetheless be well-proportioned, level and south-facing. There would therefore be no compromise in the standard of quality of external amenity space to be delivered, and so it is contended that the slight shortfall against the guideline standards would not give rise any adverse harm.</p> <p>The double aspect of the plots and their position within the sun path will optimise the energy efficiency performance of the buildings. As an affordable housing scheme, the houses will be designed</p>

	<p>in accordance with Cardiff Design standards which exceed the compulsory WDQR standards. To meet these standards, the dwellings will provide generous floorspace and ensure good quality living conditions for future occupiers.</p> <p>A Sustainability Appraisal has been undertaken and concludes that the site location is furthermore highly sustainable and ensures that the future residents will have access to services, facilities and amenity to meet day-to-day needs within a walkable distance.</p> <p>The design of the scheme has also been carefully considered to ensure no undue effect on the amenity of neighbouring occupiers. Appropriate privacy distances with existing dwellings are maintained and the siting of new structures would be such that there would be no overbearing impact on adjacent occupiers. Crime and anti-social behaviour in the locality was identified as an issue during the initial public engagement session, with local residents noted that the pub was a contributing factor to this. The redevelopment of the Site for family housing was a welcomed as a result. The scheme also makes every effort to design out crime through a variety of ways, including:</p> <ul style="list-style-type: none"> - Gable ends are provided with additional windows from habitable rooms for natural surveillance. - Legible and safe walking routes provided with removal of rear alleys. - Strong frontages of properties. - Appropriate lighting. - Bicycle stores proposed next to buildings and in view of habitable rooms and capable of being locked. <p>In summary, the design approach for the proposed development is successful in responding positively to the site and surroundings as well as the needs of the local community by delivering an appropriate built form and housing standards. This approach aims to provide a strong identity to the scheme itself whilst ensuring that it is sympathetic to the established character of the local area. The natural environment has been also taken into consideration not only as a way of achieving good design but also protecting and enhancing habitats and biodiversity on the site and its surroundings.</p>
Noise	<p>This enquiry is accompanied by a Noise Assessment Report prepared by Wardell Armstrong. The report is informed by measured noise surveys undertaken over a 4 day period in September. The survey identified road noise from Circle Way West and occasionally Brynfedw as the sole noise source on the Site. Much of the Site is identified as falling within Category A for the purposes of TAN 11 (where noise need not be considered a factor in assessing planning applications) however part of the Site falls into Category B, where noise should be taken into account.</p> <p>Detailed analysis of noise levels in outdoor living areas, living rooms and bedrooms has resulted in some recommendations for limited mitigation measures, including 1.8m high means of enclosure and façade mitigation to properties closest to Circle Way West.</p>
Air Quality	<p>The development is not located in an air quality management area. Whilst there are existing highways to the north-west and north-east of the Site these are suburban streets subject to 30mph restrictions (likely to be reduced to 20mph in the future) and relatively lightly trafficked for much of the day. As such it is not considered that the development would give rise to any concerns in respect of air quality which would warrant further consideration as part of the application process.</p>

Conclusions

The principle of the residential redevelopment of the site has been evidenced to be in compliance with key development plan policies. There is no over-riding need to retain the former public house, the community benefits of which are met by other local facilities, and the scheme will deliver significant benefit in helping meet affordable housing need in the ward. This, together with the scheme's compliance with the identified technical criteria, mean that the scheme accords with the requirements of LDP Policies C2, H6 and H3.

With regard to considerations of transport and movement, the Site is in a highly sustainable location with a wide range of services and facilities in the locality. The development would maximise opportunities for sustainable travel through the provision of new pedestrian linkages, including the offer of a new pedestrian crossing to Circle Way West. Parking would be provided to a standard appropriate to the Site's sustainable location.

The development would comply with other technical policy requirements, including in respect of trees, ecology, flood risk, drainage, design, noise, and air quality.

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