LAND TO THE SOUTH OF
FORESTER WAY AND
MALTHOUSE AVENUE

CARDIFF GATE
PONTPRENNAU

PLANNING STATEMENT

ON BEHALF OF
CARDIFF GATE INTERNATIONAL BUSINESS PARK

JUNE 2015
LAND TO THE SOUTH OF FORESTER WAY AND MALTHOUSE AVENUE

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PONTPRENNAU

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DECEMBER 2014

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1.0 INTRODUCTION & SUMMARY

1.1 This Planning Statement has been prepared on behalf of Cardiff Gate International Business Park (‘CGIBP’), to support an application for outline planning permission (all matters reserved except for access) to develop land to the south of Forester Way and Malthouse Avenue, Cardiff Gate for up to 150 homes, provision of new vehicular access, pedestrian and cyclist routes, public open space, landscaping, drainage, and associated works.

1.2 The site of 3.76 ha is located 7km to the north east of Cardiff City Centre in the Pontprennau area. CGIBP own and control the wider business park including this application site.

Background

1.3 The application site at CGIBP consists of vacant and underutilised land within the existing urban area and settlement boundary of Cardiff.

1.4 The site is sustainably located with access to a wide range of employment, services, recreation and community facilities within the immediate surrounding area of the site.

1.5 In planning policy terms, the existing City of Cardiff Local Plan, which was adopted in 1996, covered the period to 2001. It has therefore been largely superseded and overtaken by new development and Planning Policy Wales (Edition 7) 2014 such that little weight can be attributed to this document. Similarly, in respect of the emerging Development Plan, the deposit Local Development Plan (LDP) is subject of substantial unresolved objections and is currently being examined by the Inspectorate, accordingly the weight attributable to this document is limited at present.

1.6 These documents identify that the site is located within CGIBP and there is presumption that the site should be retained and developed for B1 office purposes.

1.7 However, this site has been marketed and remained undeveloped since CGIBP first started being constructed in the mid 1990’s. The plot has been marketed for over 10 years by Fletcher Morgan agents for CGIBP. It has been continually marketed on the website for over 5 years.
1.8 This is because there is already an existing stock of vacant B1 office floorspace at CGIBP 50,000 sq ft, which is immediately available for a wide range of potential tenants and occupier requirements.

1.9 In addition to which there are also a further 5.72 ha (14 acres) of available land for B1 office development elsewhere on CGIBP, which is more prominently located and located on level ground. As such, should any bespoke development requirements arise at CGIBP, it is more than possible to accommodate these requirements elsewhere within the Park.

1.10 Strategically the application site of 3.76 ha is capable of accommodating circa 18,581 sqm of B1 office floorspace (200,000 sq ft 18,580 sqm). This is not significant, representing only 3% of the overall B1 office floorspace and land available within the City of 427,000 sq m (Cardiff Employment Land Study 2012).

1.11 In terms of available B1 office floorspace, there is 45,200 sq m available across the City as well as new floorspace at:
- Capital Quarter of 18,580 sqm Grade A floorspace and permission for 65,032 sqm in total;
- Central Square with over 74,322 sqm to be delivered via Rightacres and
- Capital Tower recently vacated by Admiral of 18,580 sqm.

1.12 There is already an oversupply of available land and buildings to meet the office floorspace requirements of the City to 2026 with an identified supply of 427,000 sq m compared to the Plans requirement for 413,500 sq m.

1.13 It is therefore clear that the application site is not strategically or locally important to maintaining a supply of available B1 office floorspace or land within Cardiff.

1.14 Against this context, the emerging LDP confirms that the City has to deliver 41,100 homes between 2006 and 2026. Taking account of existing permissions, existing and proposed allocations, and completions to date this leaves a residual requirement of over 7,000 homes to be delivered on sites elsewhere within Cardiff. These sites have not been identified within the emerging LDP and the application site could therefore make a suitable contribution to this overall requirement.

1.15 Significantly, the Council have a persistent and systemic record of failing to maintain the Welsh Government’s minimum requirement of a 5 year supply of readily developable housing land as identified below:
In this situation, Planning Policy Wales and Technical Advice Note 1, identify that applications for housing development should be treated favourably where there is a lack of a 5 year housing land supply.

Consequently, appeals have been allowed by the Planning Inspectorate and the Welsh Governments Planning Minister for housing developments on greenfield sites located outside of settlement boundaries e.g Land at Church Road, Llanederyn for 150 homes, allowed by the Minister on 29th April 2013. In this appeal the Minister commented at paragraph 17 that:

“The housing land supply and the delivery of new homes in Cardiff is highly unsatisfactory.”

The Council have also granted planning permission on greenfield sites outside defined settlement boundaries e.g 100 homes on a greenfield site at land adjoining Springfield Garden Centre on the A48 in the eastern edge of the City (LPA Ref 13/1172 on 11th December 2013) and 51 homes for Redrow Homes at Land Off Cefn Mably Road And Rudry Road, Lisvane, Cardiff (LPA Ref 13/00649) 27th February 2014.

Importantly, unlike the sites identified above, this application site is not greenfield in nature (it enjoys an extant consent for B1 development), and is also located within the existing urban area of Cardiff. The proposals will provide up to 150 much needed new family homes including up to 30% affordable homes.

The Proposals

The proposals are for an outline planning permission (all matters reserved except for access) for the:

“development of up to 150 homes, provision of new vehicular, pedestrian and cyclist routes, public open space, landscaping, drainage and associated works.”
1.21 The proposals will provide up to 150 much needed family homes (2-5 bed homes) including up to 30% affordable homes.

1.22 The site is sustainably located within the existing urban area of the City and in close proximity to a wide range of employment, local services, community, and leisure facilities.

1.23 The site is also well served by public transport with a range of bus services within Cardiff Gate International Business Park on Malthouse Avenue and also 400m to the south on Heol Pontprennau linking the site to the City Centre and other areas of Cardiff. Additionally new bus routes associated with the proposed urban extensions within the emerging LDP at North East Cardiff to the west of the site and East of Pontprennau to the east of the site will deliver direct bus links through CGI BP to the City Centre.

1.24 The proposed development has been carefully developed to respond to the constraints imposed by the site and its surroundings, and to accord with the design objectives of PPW and the emerging Development Plan.

1.25 The proposals provide an attractive residential development, which will integrate with its surroundings and provide appropriate landscaping and suitable areas of public open space on the site.

1.26 This Planning Statement demonstrates that the proposals conform to relevant planning policies of the Welsh Government and Cardiff County Council and accordingly should be approved.
2.0 THE SITE AND SURROUNDINGS

2.1 The Application Site is located within the existing urban area of Cardiff, approximately 7km (direct route) to the north east of the City Centre in the Pontprennau area of the City.

2.2 The site is located within CGI BP, to the south of Malthouse Avenue and located off Forester Way.

The Site

2.3 The site is circa 3.76 hectares (9.3 acres) in area; it consists of a largely grassland/scrub area with mature hedgerows and trees lining the eastern, western and southern boundaries of the site (see Appendix 1 - Site Location Plan).

2.4 The southern boundary of the site is formed by a mature hedgerow circa 3m in height on St Mellons Road. The eastern boundary is marked by a small watercourse (the ‘Nant Pontprennau’) beyond which is a deciduous woodland area subject of a group Tree Preservation Order (TPO 171 – North West of Tyn Y Gwern). A large mature hedgerow forms the western boundary and this contains mature deciduous trees and a smaller area of trees, which are also subject of a Tree Preservation Order (TPO 177 – Adjacent to St Mellons Road). On the northern boundary are two further trees, which are protected by TPO 177 – Near Nant Pontprennau. It should be noted that all existing trees and hedges on the boundary of the site will be retained and any development will be offset from these features.

2.5 The site itself consists of under used and vacant land, with a patchwork of weeds, areas of gravel and compacted bare earth. Whilst the site is not previously developed land, the site benefits from extant outline planning permission for development for B1 office floorspace as part of the overall area of Cardiff Gate International Business Park (LPA Ref: 88/226).

2.6 Existing vehicle, pedestrian, and cyclist access to the site is provided from Malthouse Avenue and Forester Way. Additionally running along the eastern boundary of the site is Public Footpath 14 Llanedeyrn, which links across St Mellons Road to Heol Pontprennau.
**The Site's Surroundings**

2.7 Due to its location within the existing urban area of the City, the site is adjoined by existing development within the immediate surrounding area.

2.8 To the north the site is adjoined by CGI BP and existing offices (within the Class B1). There is a two storey office ‘Raglan House’ which is set 20m from the site’s northern boundary, and separated from the site by its intervening car park and partially screened by the mature holly and oak tree on this boundary.

2.9 On the north western corner of the site there is a two storey office building ‘Peterson House’ occupied by International Baccalaureate, which is set at its closest position 15m from the site’s boundary. This office building is screened from the site by the trees and mature hedgerow on the site’s western boundary.

2.10 There are also two storey offices located to the north east of the site off Copse Walk, and these are screened from the site by the intervening woodland area to the east of the site.

2.11 Accordingly, whilst the site is situated within the business park it is well contained and screened from adjoining office buildings. With suitable design and offsetting of proposed homes from the site boundaries and additional landscaping, appropriate residential amenity will be attainable within the application site.

2.12 To the south is St Mellons Road, directly to the south of which are residential properties within the wider residential area of Pontprennau.

**Public Transport**

2.13 The site is accessible by public transport with the nearest bus stop located less than 50m away from the site on Malthouse Avenue, which provides services to Cardiff City Centre approximately every 30 minutes.

2.14 The nearest train station is located approximately 6.5km away at Llanishen, which provides services to Penarth, Bargoed & Rhymney and Cardiff Central and Cardiff Queen Street approximately every 10 minutes.
Employment Opportunities in the Locality

2.15 There are extensive employment opportunities within the surrounding area at CGI BP itself which includes occupiers and business such as: Redrow Homes; Scottish and Southern Energy, BT, Lloyds Banking Group, Broomfield Alexander etc. Overall, it is estimated that the park provides over 2,000 jobs on site.

Community Facilities

2.16 The site has good access to a wide range of local facilities, services and employment opportunities. Significantly a new English-medium primary school is being built at Heol Pontprennau, which lies approximately 400m to the south of the site, which is anticipated to open in September 2015 within safe walking distance of the application site. The site is located approximately 4.5km away from St Bernadette's Primary School and 4.6km away from Corpus Christi High School.

2.17 In terms of healthcare facilities, the site is located approximately 400m walk away from Pontprennau Dentalcare, Pontprennau Medical Centre and Pontprennau Pharmacy.

2.18 Main food and non-food retail facilities are located within 500 m of the site at Cardiff Gate Retail Park which contains a large Asda Supermarket and a range of non-food stores including B&Q, Harvey's, and Oak Furniture Land. Additionally, within CGI BP is a hotel, pub, crèche, private doctor/dental surgeries and motorway services with a petrol filling station, coffee shop and convenience store.

Parks and Leisure Facilities

2.19 The site is accessible to a wide range of parks and leisure facilities with playing field and tennis court located on Heol Pontprennau approximately 400m walk away. In addition, the site lies approximately 400m walk away from Pontprennau Community Centre and 400m walk away from Pontprennau Community Church Centre.

Conclusions

2.20 It is clear from the above that the site is sustainably located and benefits from good accessibility to a wide range of services, facilities and employment opportunities within the surrounding area of the site and elsewhere in the City of Cardiff.
3.0 THE PROPOSALS

3.1 The proposals are for an application for outline planning permission with all matters reserved except for access for:

The development of upto 150 homes, provision of new vehicle access, pedestrian and cyclist routes, public open space, landscaping drainage and associated works.

3.2 Whilst this application is in outline with all matters reserved except for access, we describe below the overall form and nature of the proposals, based on the above description, the accompanying illustrative masterplan and the Design and Access Statement. Further details of the proposals are provided within the Design and Access Statement and Illustrative Masterplan (Appendix 2).

Housing

3.3 The development will consist of upto 150 homes with a mixture of 2, 3, 4 and 5 bed homes. The housing will consist of terraces; semi detached and detached properties and a small proportion of apartments.

3.4 The housing will be predominately two storey homes with occasional 2½ or 3 storey properties at key locations to define corners or terminate vistas.

3.5 The housing element will also include a proportion of affordable housing, the precise mix and tenure of which will be agreed during the application process taking into account all other S106 requirements.

Access

3.6 The existing vehicle access will be taken, via Forester Way, which will be retained although remodelled to be suitable for the proposed development.

3.7 Details of the proposed access is provided on the drawing provided by Vectos.

3.8 New pedestrian and cycle accesses and links through the site are proposed through the site from Malthouse Avenue/Forester Way to St Mellons Road. These are designed to aid permeability encouraging sustainable modes of transport and are designed to be active and well surveyed in order to provide security and safety to users.
3.9 The existing public footpath on the site’s eastern boundary (Route 14 Llanedeyrn) will be retained on its present alignment and provided within a landscaped and surveyed setting.

Public Open Space and Landscaping

3.10 An area of public open space providing a Local Equipped Area for Play is provided within the proposed development. This is overlooked and surveyed by the proposed homes.

3.11 Around the perimeter of the site, areas of informal open space and landscaping with suitable recreation routes are provided. This landscaped edge to the boundary of the site, therefore provides suitable buffers from the existing mature hedgerows and protected trees along the site’s boundaries. These landscaped areas are also overlooked and surveyed by the proposed homes.

Development Form

3.12 The development is provided in a logical layout with a perimeter block structure providing clearly defined streets with intervening areas of open space and landscaping at suitable locations.

Drainage

3.13 The proposals will incorporate sustainable drainage measures such as permeable paving, over sized pipes and a wet balancing pond. Additional information is presented in the Drainage Strategy report by Shear Design.

Conclusions

3.14 The proposed development provides a well-designed development which will deliver a sustainable residential development, utilising land efficiently and providing much needed new homes including affordable homes within the existing urban area of Cardiff.
4.0 RELEVANT PLANNING POLICY FRAMEWORK

4.1 The following section provides an overview of the relevant policy framework relating to the application proposals. In accordance with S38(6) of the Planning and Compulsory Purchase Act 2004, this application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

4.2 The starting point is therefore the statutory Development Plan, which consists of the Cardiff Local Plan 1996-2001 (adopted January 1996) and the South Glamorgan Structure Plan (Cardiff Area) 1991-2011 (adopted April 1997).

4.3 In addition there is the emerging Cardiff Local Development Plan (‘LDP’) which will replace the Cardiff Local Plan and South Glamorgan Structure Plan when it is adopted in 2015. The LDP was submitted to the Welsh Government for Examination in August 2014 and Hearing Sessions have been held throughout 2015.

4.4 In addition to the above, key other “relevant material considerations” include in particular Welsh Government policy guidance contained within Planning Policy Wales (‘PPW’) and associated Technical Advice Notes (‘TANs’).


4.5 This document sets out the land use planning policies of the Welsh Government. These are relevant material considerations for determining planning applications, particularly where Local Plans such as Cardiff’s are significantly out of date.

Sustainable Development

4.6 The key planning policy objective of the Welsh Government is to plan for the delivery of sustainable development by, among other matters:

- Promoting resource efficient development especially through the re-use of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites;
- Locating development to minimise the demand for travel especially by car;
- Encourage energy efficient development and use of energy from renewable sources;
• Minimise risks posed by unstable, contaminated land or land liable to flooding;
• Improve the quality of life and enhance the urban environment;
• Ensure that all communities have sufficient good quality housing for their needs;
• Promote access to employment, shopping, education, leisure and areas of open space, and
• Foster social inclusiveness to secure a more accessible environment for everyone.

4.7 The proposals broadly accord with these objectives.

**Good Design**

4.8 Section 4.11 of PPW ‘Promoting Sustainability through Good Design’ covers broad aspects of design requiring the consideration of the “social, environmental and economic aspects of development including its construction, operation and management and its relationship to its surroundings”.

4.9 Paragraphs 4.11.2 emphasises the importance of good design to deliver inclusive developments with people at the heart of the design process so that buildings and environments can be enjoyed by everyone.

4.10 Paragraphs 4.11.5 – 4.11.7 seek to use efficiently non-renewable resources including land, maximising energy efficiency and minimising waste and pollution, encouraging mixed use developments and ensure developments are flexible to respond to climate change.

4.11 Other aspects of good design are set out at paragraphs 4.11.8 – 4.11.13 which encourage developments that: are in scale with their surroundings and context; are safe and secure, provide areas of open space, landscaping and reinforce a sense of place and civic pride.

4.12 Paragraph 4.11.14 requires Design and Access Statements (‘DASs’) to explain how the development proposals will deliver good design.
4.13 The DAS will guide the final form of development which will include the detailed design of buildings which will be submitted as applications for reserved matters at a later stage.

**Housing**

4.14 Chapter 9 of PPW relates to housing and sets out the Welsh Government’s objectives to provide good quality homes, in safe neighbourhoods, creating sustainable communities and provide a choice of type, location, and tenure of housing (see paragraph 9.1.1).

4.15 In delivering these objectives the Government will ensure (paragraph 9.1.1) that “previously developed land is used in preference to greenfield sites; new housing [developments]...are well designed, meet national standards for the sustainability of new homes and make a significant contribution to promoting community regeneration...and the overall result of new housing development...is a mix of affordable and market housing”.

4.16 Paragraph 9.1.2 emphasises LPAs should promote amongst other matters: “mixed tenure communities; development accessible by public transport, walking and cycling; mixed use development with good access to employment, retail and other services; attractive landscapes and useable open space; good design and safe places; and the most efficient use of land”.

4.17 The proposals will deliver good quality family housing in a sustainable location with a range and choice of house types and sizes. Whilst the site is not previously developed land as it has not been occupied by buildings, hard surfaces or other structures, the site is vacant, poor quality land within the existing urban area with extant permission for development for B1 office purposes.

4.18 The proposals therefore accord with the requirements of PPW on Housing.

4.19 Significantly paragraph 9.2.3 requires that “Local Planning Authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing”.

4.20 Furthermore the Welsh Government Technical Advice Note 1 (‘TAN1’) ‘Joint Housing Land Availability Studies’ advises at paragraph 5.1 that “where...a land supply is below the 5 year requirement, the need to increase supply should be given considerable weight when dealing with planning applications, provided that the development would
otherwise comply with national planning policies. In addition, Local Planning Authorities
must take steps to increase the supply of housing land...This may include...expediting
planning applications”.

4.21 Cardiff Council as demonstrated at paragraph 1.15 and 6.17 has consistently failed to
meet this minimum requirement since 2009, and, as required by Technical Advice Note
1, the Council should favourably consider applications for housing development.

Transport

4.22 The Welsh Government’s objectives for transport are set out at paragraph 8.1.4 and
include:

- Reducing the need to travel especially by private car;
- Locating development near other related uses; and
- Improving accessibility by walking, cycling and public transport.

4.23 PPW also emphasises the need to manage traffic and parking to give priority to non-car
modes of travel.

4.24 The site is sustainably located with good access by bus, cycling and walking to
employment, retail, community facilities including primary and secondary schools and
sports pitches and other services in accordance with the requirements of PPW.

4.25 A framework Travel Plan by Vectos has been provided which contains preliminary
targets for travel by modes of transport for residential areas. The report also sets out
initiatives and measures to support these targets to influence travel behaviour and
minimise single occupancy.

4.26 Technical Advice Note 18 (‘TAN18’) ‘Transport’ emphasises the need to follow the
principles and guidance of Manual for Streets, providing emphasis to minimise vehicle
speeds and favour movement of pedestrians and cyclists.

4.27 A Transport Assessment (Vectos) has been prepared which demonstrates that the site is
sustainably located; and that the traffic from the proposals can be accommodated
without detriment to the existing operation and safety of the highway network.
4.28 The Design & Access Statement and Illustrative Masterplan demonstrate how the proposals seek to minimise vehicle speeds, favour movements for pedestrians and cyclists and accord with the design approach of TAN 18 and Manual for Streets.

Flood Risk and Climate Change

4.29 In relation to new development, the Welsh Government seeks to ensure that new development is not exposed unnecessarily to flooding. In controlling surface water drainage the use of sustainable drainage systems is required.

4.30 The site is not located in a zone at risk of flooding, and sustainable drainage systems are incorporated into the proposed development to control surface water run-off.

SOUTH GLAMORGAN STRUCTURE PLAN (CARDIFF AREA) (Adopted 1997)

4.31 The Structure Plan forms part of the Development Plan and covers the period 1991-2011. However, it was formulated at the beginning of the 1990’s, was adopted 18 years ago and is time expired by 3 years. Consequently, many of its policies have been overtaken by events and more recent policies of the Welsh Government.

4.32 Policy H1 sets the strategic housing requirements to 2011, requiring 22,300 dwellings within the plan period. It also states that this demand will be met by “giving priority to the ... redevelopment of suitable cleared sites within the urban area”. The overall housing requirement has been overtaken by the latest Welsh Government Household Projections and the emerging LDP (see later). However it is important to note that the site is within the existing urban area of Cardiff.

4.33 Policy E3 Protection of Business and Industrial Land seeks to protect “land allocated or identified for business and industrial purposes in the Development Plan... subject to other development plan policies”. We show later (see Section 7 Development of Surplus Employment Land) that the site is no longer suitable or required for employment purposes and it is therefore appropriate to be redeveloped for housing.
CARDIFF LOCAL PLAN 1986-2001

4.34 The Local Plan covers the period 1986-2001 and was adopted in January 1996. The plan is time expired by 14 years but it is still utilised as the basis for determining planning applications. However, its material weight is significantly reduced given its age and because it has been overtaken by events, particularly more recent polices of the Welsh Government.

4.35 The Local Plan Proposals Map shows that the site is located within the existing urban area of Cardiff. The site is also identified as an existing employment site to which Policies 36, 37, and 39 apply. Policies 37 and 38 relate to industrial areas and operational docks and are therefore not relevant to these proposals. The key relevant policy is therefore Policy 36, which states that:

“Proposals for the alternative use of existing and proposed business, industrial and warehousing land will be assessed against the following:

- The demand for and the need to preserve a range and choice and quality of sites available for business, industrial and warehousing development;
- Considerations of scale, location, design, amenity and transportation.”

4.36 We show later in Section 7 that the site is not required to meet the office needs of the City, that it has been marketed for several years with no interest from potential occupiers and that there is a large stock of existing and emerging B1 office floorspace available within Cardiff particularly within the City Centre, Enterprise Zone and Cardiff Bay. This plot therefore does not form an important part of the overall employment land supply within Cardiff such that its release for other development would undermine the economic development objectives of the City.

Design & Development

4.37 The Local Plan provides guidance on design and development seeking good design with proper regard to scale and character of the surrounding area (see Policy 11) and seeks energy efficient design through building design, layout, and orientation (see Policy 23). The proposals will deliver good design and energy efficient development. This is demonstrated within the DAS submitted with the application.
4.38 Policies 16 and 17 seek to reduce the impact of traffic and ensure adequate car parking provision in accordance with Council standards. Policies 18, 19 and 20 seek to deliver provision for cyclists including cycle parking, safe and convenient environments for pedestrians and access for all, respectively. The proposed development will encourage and facilitate movement by non-car modes.

4.39 Policy 31 seeks to deliver within all new housing developments 2.53 hectares of public open space per 1,000 of the projected population taking into account the extent of existing provision in the area. The development includes local areas of public open space for use of children in the development together with public open space. The site is also located within 400m of sports pitches at Heol Pontprennau which is readily accessible from the development.

CARDIFF LOCAL DEVELOPMENT PLAN 2006-2026

4.40 The Deposit Draft Local Development Plan (September 2013) sets out the Council’s planning policies for the City of Cardiff over the period 2006-2026. The LDP is presently at the Examination stage by the Inspectorate. Accordingly, it is subject to unresolved objections and has not been reviewed by the Inspectorate. As such the LDP currently has limited material weight. However, it is relevant to review its policies and objections as they relate to these proposals.

4.41 The LDP will replace the Cardiff Local Plan and South Glamorgan Structure Plan when it is adopted later in 2015. The LDP was submitted to the Welsh Government for Examination in August 2014 and Hearing Sessions commenced in January 2015.

Objectives

4.42 Key objectives of the Deposit LDP amongst other issues are to:

- Use land efficiently by locating development on previously developed land;
- Secure sustainable growth of the City including the provision of a range and mix of housing;
- Ensure a range and choice of employment sites;
- Create sustainable communities; and
- Aid regeneration.
4.43 These proposals will reuse efficiently vacant and underutilised land within the existing urban area of Cardiff. This will deliver much-needed new homes including affordable housing.

Sustainable Development & Design

4.44 Policy KP5 ‘Good Quality Sustainable Design’ embodies the key design principles relating to: character and context; legibility; safety; resource efficiency; integration; adaptability and inclusive design. The proposals will deliver sustainable development and good design and this is set out further within the DAS.

The Proposals Map

4.45 The Deposit LDP Proposals Map identifies that CGIBP and the Application Site is located within the defined settlement boundary of Cardiff and is therefore not located within the open countryside.

4.46 Policy KP3(B) ‘Settlement Boundaries’ confirms that “in order to strategically manage the spatial growth of Cardiff...in all areas outside the defined settlement boundaries...there will be a presumption against inappropriate development”.

Employment

4.47 Policy KP2 ‘Strategic Sites’ identifies the key sites to meet the housing and employment needs of the City over the plan period, which for employment are:

- Cardiff Central Enterprise Hub for major employment opportunities focused in business services and financial sector;
- North West Cardiff which whilst for 5,970 homes also includes employment areas (the application LPA ref 14/02733 identifies provision of 15,000 sqm of B1 floorspace);
- North of Junction 33 of the M4, for 2,000 homes and employment (the application LPA Ref: 14/00852/DCO identifies approximately 15,000 sqm of B1, B2 & B8 office floorspace);
- North East Cardiff for 4,500 homes and employment uses; and
- St Mellons Business Park a strategic site of 96.2ha.
4.48 Accordingly within the emerging LDP and associated strategic sites there will be a large supply of B1 office floorspace, in addition to existing vacant stock 45,200 sqm and 330,000 sq m of existing land for B1 offices.

4.49 CGI BP is identified as an existing employment area which via Policy EC1 Existing Employment Land states that:

“The City’s existing employment areas outside of the central and bay business areas (as designed on the Proposals Map) will be protected for B use class employment uses (together with appropriate ancillary and or complementary uses and activities as referred to in Policy EC2) as described in the table below...”

EC1.6 Cardiff Gate Business Park, B (offices) ancillary B2.”

4.50 The site is therefore proposed to be protected for employment uses within the emerging LDP. However this policy is subject to objection by Cardiff Gate International Business Park and others given the vast oversupply of B1 office floorspace and land that exists through existing buildings, planning permissions and proposed allocations within Cardiff.

Alternative Use of Employment Land and Premises

4.51 Policy EC3 ‘Alternative Use of Employment Land and Premises’ confirms that development of business, industrial and warehousing land and premises for other uses will only be permitted if:

- The land or premises are no longer well-located for business, industrial or warehousing use; or
- 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
- There will be no unacceptable impact on the operating conditions of existing businesses.

4.52 We address these requirements and the policies supporting text in detail within Section 7 and show that the proposals comply with all three criteria of Policy EC3.
**Housing Need and Allocations**

4.53 The housing growth requirement for the City is set out by Policy KP1 and this requires the delivery of 41,000 new dwellings in Cardiff over the period 2006 and 2026.

4.54 Making an allowance for past completions and existing commitments (i.e. not started planning permissions and allocations of 16,475 homes) \(^1\) there is a residual requirement of circa 24,525 dwellings to be delivered in the plan period from 2013 to 2026. \(^2\) Of this requirement 14,000 homes will be provided by strategic urban extensions and a further 548 homes on non strategic sites.

4.55 The remainder of 7,000 dwellings is to be delivered on unidentified “windfall sites”. However as set out later in Section 7 this accounts for 28% of the residual requirement (24,525).

4.56 It is not appropriate to rely to this extent on windfall sites to meet housing needs set out in the plan, as such sites can not be guaranteed to be delivered, particularly given the absence of allocations within a time extant Development Plan. This situation is evidenced within the Council’s Housing Monitoring Report of 2013.

4.57 Accordingly, this application site will make an important contribution to reducing reliance on unidentified windfall sites.

4.58 Significantly, Cardiff Council has persistently failed to maintain the minimum 5 year housing land supply required by the Welsh Government and TAN1 as demonstrated below:

<table>
<thead>
<tr>
<th>Year</th>
<th>2009/10</th>
<th>2010/11</th>
<th>2011/12</th>
<th>2012/13</th>
<th>2013/14</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land Supply</td>
<td>4.5</td>
<td>3.4</td>
<td>2.3</td>
<td>2.9</td>
<td>3.2</td>
</tr>
</tbody>
</table>

4.59 Policy H3 ‘Affordable Housing’ seeks the delivery of 30% affordable homes on developments of 10 or more dwellings on sites which are not previously developed land.

4.60 The proposals will incorporate a suitable element of affordable housing, the precise amount and mix will be determined during the application process taking account of all other S106 contributions.

---

\(^1\) From LDP Table 1 and JHLAS post completions.

\(^2\) Residual requirement not adjusted to 2014 due to incomplete data availability.
Conclusions

4.61 It is clear from the above that the overall policy approach of PPW, the Cardiff Local Plan, Structure Plan, and emerging LDP is to deliver sustainable development, particularly through the development of existing underused sites within Cardiff’s urban area for housing and other purposes. The policies also seek to deliver appropriate community benefits, high quality design and energy efficient buildings.

4.62 With regard to the identified employment use, we show later in Section 7 that:

- The site has been marketed for several years with no occupier / developer interest for B1 office use;
- There is a vast stock of existing vacant B1 office floorspace available elsewhere within the City of Cardiff and Cardiff Gate Business Park itself;
- There is a vast supply of land for B1 office floorspace development within the city; and
- This site does not form a key part of the overall B1 office or B1 office land supply in the City.

4.63 Accordingly, the development of the site for housing will not materially harm the purposes or policies of the Local Plan or emerging LDP.

4.64 Within the above context and reference to relevant policy framework, we consider in the following sections the key planning issues relating to the proposed development.
5.0 PRINCIPLE OF DEVELOPMENT

5.1 Importantly the site is located within the existing settlement boundary of Cardiff and is vacant, underutilised land within the existing urban area of Cardiff. Furthermore the site also benefits from outline planning permission as part of CGI BP for B1 office development 88/226 approved in 1992. It is therefore not “new” development outside settlement boundaries or on a greenfield site.

5.2 Planning Policy Wales (Chapters 4, 7 and 9), the existing Local Plan, Policies EV1/EV2 and H1 of the Structure Plan and the LDP (Policies KP1, KP33, KP5) all emphasise the primary requirement to deliver development and regeneration through the reuse and redevelopment of not only previously developed land but also vacant and underutilised land within existing urban areas for housing purposes. Accordingly, the proposals accord with this overall policy approach at national and local levels.

5.3 Additionally the site is sustainably located as it has good access to a range of services, employment opportunities and other facilities within the immediate area and wider City of Cardiff, which can be reached by walking, cycling and public transport.

<table>
<thead>
<tr>
<th>TABLE 5.1 - Accessibility</th>
<th>Location</th>
<th>Approximate Distance*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employment Area</td>
<td>Cardiff Gate Business Park</td>
<td>&lt;50m</td>
</tr>
<tr>
<td>Primary School</td>
<td>New Primary School being built at Heol Pontprennau</td>
<td>&lt;400m</td>
</tr>
<tr>
<td>Secondary School</td>
<td>Corpus Christi High School</td>
<td></td>
</tr>
<tr>
<td>Park/Public Open Space</td>
<td>Heol Pontprennau Playing Fields</td>
<td>&lt;600m</td>
</tr>
<tr>
<td>Food and Non-Food Retail</td>
<td>Cardiff Gate Retail Park</td>
<td>&lt;800m</td>
</tr>
<tr>
<td>Bus Stops</td>
<td>Heol Pontprennau Malthouse Avenue</td>
<td>&lt;50m &lt;400m</td>
</tr>
</tbody>
</table>

* Distances as route taken on foot, cycle or bus i.e. not as crow flies.

5.4 The proposed development is therefore fully in accordance with paragraph 4.4.3 of PPW which sets out the Welsh Government’s objectives for sustainable development, in that the proposed development is sustainably located in close proximity to local services and facilities, and ensures that sufficient good quality housing is provided for the needs of the local community, including affordable housing. The proposals also comply with Policy EV1 of the Structure Plan and Policies KP4, KP5, KP8 and KP14 of the DLDP relating to sustainable development.
5.5 The site is not within an area defined as a functional floodplain or at a high risk of flooding as set out by Natural Resources Wales and TAN15. The proposals therefore comply with the requirements of PPW, TAN15 and policies of the Development Plan on this important issue.

5.6 The site is not subject to any specific designations or restrictions which would prevent its redevelopment for housing or other purposes i.e. the site is not within or affected by a Site of Special Scientific Interest, Conservation Area, Listed Buildings, or Scheduled Ancient Monuments.

5.7 Development of the site for housing will therefore represent sustainable development as defined by PPW and the broad objectives and key policies of the Structure Plan, Local Plan and emerging LDP.
6.0 CARDIFF’S HOUSING NEED

6.1 The need for housing in Cardiff is set out within Policy KP1 of the emerging LDP and this identifies the need to provide 41,100 homes in Cardiff between 2006 and 2026.

**Strategic Housing Requirement**

6.2 The Deposit Plan at KP1 identifies the requirement to deliver over the Plan period (2006-2026) 40,000 new jobs and “approximately” (41,100 new homes). The Deposit LDP target for 41,100 new homes, is substantially below the latest Welsh Government Household Projections for Cardiff which require between 43,780 to 45,488 homes to be provided within Cardiff over the period 2006-2026.

6.3 Planning Policy Wales (paragraph 9.2.2) identifies that the Welsh Government projections are the starting point for assessing overall housing need in a Local Planning Authority Area.

6.4 The Deposit Plan proposes to deliver 41,100 homes over the Plan period. Table 1 identifies the total dwellings completed between 2006-2013 of 11,265 dwellings based on ONS records. This is a new term and source of data for housing completions which also includes bedsits and student homes. The completions from the ONS has not been validated and more over do not match the completions recorded via the Welsh Government Joint Housing Land Availability Study (JHLAS) process or the Council’s records over the same period of 8,711 homes.

6.5 There is therefore a fundamental error in Table 1, which records an extra 2,554 homes in the City compared to the JHLAS completions records.

<table>
<thead>
<tr>
<th>Deposit LDP Residual Requirement 2013-2026</th>
<th>Deposit LDP Table 1 Reference</th>
<th>Number of Homes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Requirement 2006-2026</td>
<td>Row 1</td>
<td>41,100</td>
</tr>
<tr>
<td>Completions JHLAS Data 2006-2013 from Welsh Government.</td>
<td></td>
<td>8,711</td>
</tr>
<tr>
<td>Sites under construction</td>
<td>Row 4</td>
<td>1,056</td>
</tr>
<tr>
<td>Extant planning permissions</td>
<td>Row 5</td>
<td>5,721</td>
</tr>
<tr>
<td>Sites with resolution to approve subject to S106</td>
<td>Row 6</td>
<td>3,546</td>
</tr>
<tr>
<td>Flexibility allowance for sites with PP/S106 not</td>
<td>Row 16</td>
<td>-1,853</td>
</tr>
</tbody>
</table>
The LDP seeks to address the majority of the residual housing requirement (24,525) by identifying large strategic urban extensions to provide 13,950 homes at various locations around the City between 2013 and 2026. However, these urban extensions will have very significant and long lead in times before they start delivering significant numbers of new homes given the substantial infrastructure required to enable their delivery. We estimate 3 years as per evidence and decision of the Inspectorate in relation to the delivery of Strategic sites in land off Heath Road, Sandbach (Pins Ref ROGJ O/A/14/2212992). Accordingly, the LDP must ensure that there is a supply of sites for housing upon specifically identified, short term and readily developable land from 2014 to 2018.

Outside of the new strategic allocations, the LDP identifies the delivery of circa 7,040 dwellings via windfalls. The “windfalls” are not based on specific identified sites, which are known to be available, deliverable, and suitable but are based upon largely the past build rates achieved on windfall sites over the last 10 years in Cardiff.

The level of windfalls relied upon within the LDP of 7,040 dwellings equates to around 28% of the residual requirement between 2013 and 2026. This proportion of the residual requirement is based on the Council’s stated sources of supply (i.e. unimplemented planning permissions and allocations) and JHLAS completions. We consider that the Council’s sources of supply (planning permissions) are likely to be optimistic given the findings of the 2014 Joint Housing Land Supply Study (see later).

In relation to the windfalls supply, whilst a discount of 40% has been applied to derive supply, this appears to be an arbitrary discount and unsubstantiated by robust evidence.

Fundamentally, by their very nature, there can be no guarantee that “windfalls” identified in the Deposit Plan will be delivered on the scale required or in the timeframe needed particularly in the first 5 years of the Plan period. The Council’s Urban Capacity Study Technical Paper No 2, provides no specific information on the deliverability, suitability and achievability of any specific sites which would contribute to the identified windfall figures of the Council. For instance, the Urban Capacity Study only identifies a potential supply of 1,500 homes on specific sites, i.e. 15% of the overall windfall.
allowance in the LDP (Appendices 2 and 3). This is not considered robust and does not provide substantive evidence to support the scale of windfalls being relied upon in the LDP.

6.11 Windfall sites for housing within any urban area are of a finite supply. In Cardiff’s case, due to the lack of an adopted Development Plan in the City for the last 13 years; developers have necessarily (due to the lack of significant new/deliverable allocations) focused on delivering housing on sites within the existing urban area through the redevelopment of brownfield sites, demolition and change of use of former industrial, retail, commercial and other areas (i.e.: “windfall sites”). Accordingly, by definition, Cardiff has been reliant upon the delivery of windfalls to meet housing needs over the last 13 years, as there has been largely no other means of delivering sites for housing development. This is demonstrated in Figure 13 of the Council’s Housing Monitoring Schedule of March 2013.

**Dominance of Flatted Development**

6.12 The Council’s latest available Housing Monitoring Schedule of March 2013 identifies that since 2006, completions in terms of flats/apartments have totalled 5,933 apartments, where as family housing has only provided a total of 2,850 homes. Additionally within the identified housing land supply, apartments account for 84% of the land supply.

6.13 This situation does not provide a range and choice of sites and homes for the growing population and households of Cardiff, as required by paragraph 9.1.1 of PPW which states that a key objective of the Welsh Government is to ensure a: **“Greater choice for people over the type of housing and the location they live in recognising the needs of all”**

**Need for Family Housing**

6.14 The high density apartment developments which make up the majority of the Council’s existing land bank do not deliver integrated, sustainable and mixed communities. This is a key requirement of PPW which states at paragraph 9.2.14 that there is a need to ensure that **“a reasonable mix and balance of house types and sizes are provided to cater for a range of housing needs and contribute to the development of sustainable communities.”**

6.15 The Cardiff Local Housing Market Assessment which forms a key element of the evidence base for the LDP identifies that 52% of all the housing requirements in the
City are for 3 and 4 bed housing. Accordingly the dominance of the 1 and 2 bed flatted sector within the existing land supply, crucially fails to meet the actual housing needs of the City. The proposed development of family houses on the application site will contribute to meeting the requirement for this type of accommodation.

6.16 It is therefore clear that there is an overwhelming need to release this sustainable and vacant/underused site for housing in order to assist in meeting the housing needs of the City to 2026 and help address the chronic housing shortage in the City.

**Short Term Requirement - Five Year Land Supply**

6.17 In addition to the above it is also clear that the City cannot demonstrate as required by PPW and TAN1 a 5 year supply of housing land and there is a persistent, and systemic failure to provide sufficient land to deliver a minimum 5-year supply of deliverable land for housing within Cardiff over recent years:

<table>
<thead>
<tr>
<th>Land Supply Years</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>4.5</td>
<td>3.4</td>
<td>2.3</td>
<td>2.9</td>
<td>3.2</td>
</tr>
</tbody>
</table>

6.18 As such in accordance with paragraph 5.1 of TAN1 where the “land supply is below the 5 year requirement, the need to increase supply should be given considerable weight when dealing with planning applications, provided that the development would otherwise comply with national planning policies. In addition local planning authorities must take steps to increase the supply of housing land. This may include .... expediting planning applications.”

6.19 We have previously shown that these proposals accord with the wide ranging requirements of PPW, the existing Development Plan and the emerging LDP. Accordingly for these reasons and the guidance of TAN1, these proposals should be favourably considered by the Council.

**Conclusions**

6.20 The proposed development of this site for predominately family housing including affordable housing, would contribute to meeting the housing needs of the City to 2026.
6.21 The site is vacant, under used land within the existing urban area of the City. Its development for housing purposes conforms with PPW, the time expired Local Plan and the emerging LDP’s strategy of delivering the future housing needs of the City.

6.22 Importantly, the Council cannot demonstrate a 5 year supply of deliverable and available land for housing with planning permissions or allocations. In fact it has persistently and remains significantly below the required minimum of a 5 year land supply required PPW for over 4 years. Accordingly, as required by PPW and TAN1 the Council should favourably consider these proposals in order to assist in rectifying the situation.

6.23 These proposals will also improve the overall environment of the site and surrounding area, providing new homes, pedestrian and cyclist routes through the site to CGI BP and Pontprennau. The proposals will also deliver new areas of public open space and landscaping.
7.0 DEVELOPMENT OF SURPLUS EMPLOYMENT LAND

7.1 The site is identified as part of an existing employment site within the emerging LDP and the time expired City of Cardiff Local Plan.

7.2 However, PPW and the LDP encourage the redevelopment of sites particularly underused sites within the existing urban area for housing and other uses.

7.3 Of course as an existing employment site, Policy EC1 of the emerging LDP and Policy 36 of the Local Plan seek to protect sites which are in existing employment uses.

7.4 However, Policy EC3 of the emerging LDP for the “Alternative Use of Employment Land” provides a framework to allow the redevelopment of such sites where:

- The land or premises are no longer well-located for business, industrial or warehousing use; or

- 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

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

No longer well located for business use

7.5 It is important to note that the criteria is subject to a “or” test. Accordingly compliance with the first criteria is only required if compliance with the 2nd and 3rd criteria is not possible, and we demonstrate later that the proposals comply with the 2nd and 3rd criteria of Policy EC3.

7.6 Irrespective of this, the application site is not well located for business uses. This is because whilst located on CGIBP the plot is not prominently located on Malthouse Avenue, but is situated behind large prominent office buildings. The plot therefore lacks visibility and exposure, required to attract potential occupiers.
7.7 The plot has consistently been marketed by:

- Continual marketing via CGI BP’s website for over 5 years;
- Specific market brochures and particulars for bespoke design and build projects for potential occupiers;
- General marketing of CGI BP through Fletcher Morgan the retained agents for CGI BP for over 10 years; and
- Confirmation letter from CGI BP and Fletcher Morgan that despite the above efforts the plot has not received interest from prospective occupiers.

7.8 Additionally the site is not level and has a gradient sloping from the north to south with an overall level change of 20m across a length of 200m, a 1:10 gradient. It is therefore not readily developable for offices without considerable earth works to cut and reprofile the site. There is not sufficient space to retain likely level of cut material on the site for a 200,000 sq ft office, or elsewhere within CGI BP. Accordingly, this material would need to be exported off site and this would be a costly exercise. This is a further reason why the application site has not been developed for offices.

7.9 In comparison, there are more prominent and importantly level plots elsewhere within CGI BP totalling 14 acres, which are capable of delivering B1 office floorspace, excluding present application site (Plot 12) which extends to 9.3 acres.

<table>
<thead>
<tr>
<th>Plots at CGI BP</th>
<th>Area acres</th>
<th>ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plot 12</td>
<td>9.3</td>
<td>3.76</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other Plots of land at CGI BP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kennels Site</td>
</tr>
<tr>
<td>5</td>
</tr>
<tr>
<td>2.02</td>
</tr>
<tr>
<td>Plot 8B</td>
</tr>
<tr>
<td>2.4</td>
</tr>
<tr>
<td>0.97</td>
</tr>
<tr>
<td>Plot 8A</td>
</tr>
<tr>
<td>0.9</td>
</tr>
<tr>
<td>0.36</td>
</tr>
<tr>
<td>Plot 14</td>
</tr>
<tr>
<td>3.6</td>
</tr>
<tr>
<td>1.46</td>
</tr>
<tr>
<td>Plot 15 temporary car park</td>
</tr>
<tr>
<td>2.25</td>
</tr>
<tr>
<td>0.91</td>
</tr>
<tr>
<td>Total area of plots excluding Plot 12</td>
</tr>
<tr>
<td>14.15</td>
</tr>
<tr>
<td>5.72</td>
</tr>
</tbody>
</table>

7.10 Furthermore, there is also a wide range of existing available and vacant floorspace within CGI BP, which can be immediately occupied by potential tenants totalling 50,000 sq ft.

7.11 Finally, we show below that there is also a wide range and choice of available land and premises elsewhere within Cardiff, which is immediately available for B1 office development/occupiers, and these areas have been successful in attracting development ahead of CGI BP in recent years.
Availability of Employment Land and Floorspace in Cardiff

7.12 The most up to date available information from the Council is contained within the Cardiff Employment Land Study by DTZ (2011) which details the employment land requirements and existing supply within Cardiff to 2026.

7.13 In overall terms, the Deposit LDP seeks to deliver 40,000 new jobs over the Plan period, which the LDP translates into specific requirements for B1, B2 and B8 floorspace, taking into account that employment will be delivered within non-business class uses (i.e. retail, leisure etc).

7.14 Through this approach, the Deposit LDP identifies (Background Topic Paper No 4 Economic, Table 9) a requirement to deliver between 413,500 sqm to 501,200 sqm of B1 office floorspace over the Plan period. In terms of meeting this requirement, the Deposit Plan (Background Topic Paper No 4 Economic, Table 11) identifies the following sources of supply:

<table>
<thead>
<tr>
<th>Category</th>
<th>Office Floorspace sq m</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Existing vacant stock (including a 30% allowance for un-lettable stock)</td>
<td>45,200</td>
</tr>
<tr>
<td>b) Identified land supply</td>
<td>297,800</td>
</tr>
<tr>
<td>c) Cardiff Central Enterprise Zone Proposals (Phase 1 new additional supply)</td>
<td>27,900</td>
</tr>
<tr>
<td>d) Completions elsewhere within LDP period</td>
<td>56,100</td>
</tr>
<tr>
<td>Total</td>
<td>427,000 sq m</td>
</tr>
</tbody>
</table>

7.15 Accordingly, there already exists a surplus of 13,500 sqm (circa 130,500 sq ft) of B1 office floorspace identified by the Council, which is in excess of the LDP’s identified requirement for B1 office floorspace of 413,500 sq m.

7.16 Since publication of the Deposit Plan, it is also relevant to note that there has been additional B1 office development planning permissions and completions within the City Centre Enterprise Zone, which will have added to this pipeline of B1 office floorspace.

7.17 Notable additions include:

- JR Smart at Capital Quarter, with circa 200,000 sq ft B1 office floorspace available or under construction, with permission in total for 700,000 sq ft.
- Rightacres at Central Square, with circa 800,000 sq ft of floorspace.
- Admiral Insurance at Ty Admiral, with 200,000 sq ft, which they have relocated from Capital Tower on Greyfriars Road releasing circa 200,000 sq ft of B1 office floorspace.
7.18 This assessment of B1 office floorspace supply does not make allowance for the additional land likely to come forward for significant additional areas of B1 office floorspace comprising:

- The Cardiff Central Enterprise Zone which totals circa 55 hectares including Tyndall Street and Dumballs Road;
- Other brownfield employment sites throughout the City; and
- The refurbishment of existing vacant stock.

7.19 Paragraph 4.62 of Technical Paper 4, identifies that having undertaken additional work the Council have identified a further supply of 75,839 sqm B1 floorspace through existing planning permissions and S106 agreements (Paragraph 4.62 of Technical Paper 4).

7.20 If these additional sources of supply for B1 office floorspace were included there would be a surplus of 159,253 sqm of B1 office floorspace in excess of the maximum amount of B1 office floorspace of 501,200 sqm required over the Plan period (Paragraph 4.61 of Technical Paper 4).

7.21 Furthermore, this oversupply excludes land in the LDP for B1 office of 90,000 sqm of campus office development floorspace at St Mellons and Trowbridge. This allocation will deliver significant additional areas of land for the development of B1 office floorspace within the City compounding the existing over supply.

7.22 Finally, the oversupply identified above also excludes B1 office floorspace within the planned strategic urban extensions to Cardiff, including North East Cardiff immediately adjacent to CGIBP and at North West Cardiff which includes 15,000sqm of B1 floorspace. These urban extensions will, as identified by the LDP, include mixed-use areas including B1 office floorspace in order to deliver sustainable and mixed developments thereby further increasing the oversupply of office floorspace in Cardiff.

7.23 It is therefore evident that the LDP substantially over provides for the amount of B1 office floorspace required in the City over the Plan period.

*No Impact on Operating Conditions of existing businesses*

7.24 As demonstrated earlier, Plot 12 is capable of being developed for housing without adversely affecting the operating conditions of the adjoining offices. This is because B1
offices are by definition compatible with residential uses given the lack of noise, odour etc from the buildings/operations.

7.25 In terms of amenity the main consideration is overlooking and in this regard the site boundaries provide good screening between the site and existing office buildings. Furthermore, with suitable design and offsetting of properties from the site boundaries appropriate separation distances will be achieved to provide suitable amenity standards within the proposed homes.

Conclusions

7.26 Plot 12 has been available and actively marked for office development for over 10 years. It has not come forward for development, as other plots at CGIBP are more attractive and readily developable than this plot.

7.27 There also remains over 16 acres of other more readily developable plots at CGIBP located in more prominent locations than the application site, whilst there is also an supply of 50,000 sq ft of available existing offices at CGIBP ready for potential tenants.

7.28 Within Cardiff overall we have shown that there is a vast supply of land and B1 office floorspace available within the City.

7.29 Significantly, there is a major supply of land and new office floorspace being delivered within the City Centre Enterprise Area. At present, there is over 45,200 sq m of B1 office floorspace already available within this area, with a further 297,800 sq m being delivered or with planning permission.

7.30 Against this background, it is clear that the application site is not well located or suitable for B1 office development and that there is a significant supply of land and premises elsewhere in the City providing a range and choice of sites. Furthermore development of the site for housing will have no impact on the operating conditions of the adjoining Business Park, given that these existing office uses are compatible with an adjoining residential area.
8.0 DESIGN

8.1 The application is in outline with all matters reserved except for access. Accordingly details of layout, appearance and scale are not fixed at this stage and these along with other detailed design matters, will be determined at the reserved matters stage.

8.2 Details of the new proposed means of access to the site are set out within the Transport Assessment. These drawings provide for the remodelling of the existing accesses into the site off Forester Way.

8.3 The proposals are supported by a Design and Access Statement. This document explains the evolution of the proposals from initial concept, through to draft proposals and the final proposals which are now subject of this application.

8.4 The Design and Access Statement is also accompanied by an Illustrative Masterplan which identifies the potential form and scale of development within the site.

8.5 A central housing core will provide up to 150 homes. The area is formed from a logical series of streets which create legible and secure perimeter blocks for residential properties. The housing area has been designed to provide mainly detached, semi detached and terraced forms of housing with a limited number of apartments.

8.6 A large area of clearly defined public open space is provided, which is well surveyed and overlooked to enable access for all from within the development and the surrounding area.

8.7 The Illustrative Masterplan and DAS provide comprehensive landscaping proposals which will provide an attractive and natural environment within the development and along its boundaries.

8.8 All existing trees and hedgerows around the boundary of the site will be retained and protected. Furthermore the proposals also incorporate suitable areas of landscaping and buffer areas around the boundary of the site.

8.9 Overall the proposals will substantially enhance the character, appearance, and quality of the site and this area and as demonstrated within the Design and Access Statement and Illustrative Masterplan are considered to be well designed in accordance with PPW and TAN12.


9.0 **SUSTAINABILITY**

9.1 Sustainability is at the heart of the planning system. The proposals accord with the key requirements of the Welsh Government and Cardiff Council in terms of delivering sustainable development.

**Efficient Use of Urban Land**

9.2 The site of circa 3 ha is presently vacant, underutilised land within the existing urban area of Cardiff.

9.3 The proposals will result in the efficient use of this underused site by providing up to 150 homes on the site at an average net density of 45 dwellings per hectare.

**Accessibility**

9.4 The site is highly accessible by walking and cycling to a wide range of local facilities including schools, shops, public open space, leisure facilities and employment areas.

9.5 The site is also highly accessible by public transport with very frequent bus services to the City Centre and other destinations within Cardiff. Details of the accessibility of the site are set out within the Transport Assessment.

9.6 The site’s development for housing therefore accords with the requirements of PPW and the LDP in terms of accessibility by modes of travel other than the private car.

**Conclusion**

9.7 The proposals will deliver sustainable residential development through the development of vacant under utilised land in a sustainable location within the existing urban area of Cardiff. It will provide much needed family and affordable housing.

9.8 The site has good access to local services, community facilities, retail, and employment opportunities by public transport, walking, cycling and bus and Llanishen railway station.
10.0 TECHNICAL SITE SPECIFIC ISSUES

10.1 This section addresses in summary the key technical site specific issues relating to the development of the site. In this section we summarise the main findings of the specialist consultant reports relating to transportation, ecology, flood risk and drainage, noise and ground conditions. We show that with reference to these documents that the proposals are acceptable in terms of these key issues.

Transportation

10.2 A Transport Assessment and Framework Travel Plan has been prepared by Vectos for the proposed development. This demonstrates firstly that the site is sustainably located with good access by walking, cycling and public transport to a range of facilities, services and employment opportunities. It therefore demonstrates that the proposals are appropriate for the site in broad sustainability terms.

10.3 The Transport Assessment also considers the level and distribution of traffic which will arise from the proposed development and its impact on the existing road network.

10.4 The Assessment shows that the proposals will not materially effect existing capacity or safety in the surrounding area.

10.5 Accordingly the proposals are acceptable in highway safety and impact terms.

Ecology

10.6 The Ecology Report by ADAS demonstrates that through retention of trees and hedgerows around the boundary of the site that there will be no material effect on protected species.

Flood Risk & Drainage

10.7 A flood risk and drainage statement has been prepared by Shear Design.

10.8 The site is not within an area at risk of flooding as defined on the Welsh Government Development Advice Maps.

10.9 In terms of surface water drainage this will be dealt with via a sustainable drainage system, including a new wet balancing pond.
10.10 Accordingly the proposals have fully considered and addressed this issue as required by PPW, TAN15 and the Development Plan.

**Noise**

10.11 The proposed housing is located in proximity to the adjacent office uses. However, B1 office uses by definition appropriate within residential areas as they do not give rise to noise or nuisance issues (soot, vibration, excessive noise etc).

10.12 Accordingly, suitable noise levels can be achieved within the residential properties in accordance with the requirements of TAN11.

**Ground Conditions**

10.13 The site is not previously developed land, although it has been subject to land profiling with soil and earth form elsewhere within the Business Park.

**Conclusions**

10.14 The supporting technical reports demonstrate that there are no site specific technical issues which would prevent the development of the site for the proposed development.

10.15 It also demonstrates that the proposals will have no material impact on existing infrastructure, services, or existing/future occupiers within the site or the surrounding area.
11.0 DRAFT S106 and HEADS OF TERMS

11.1 At this stage the precise requirements for the Draft Heads of Terms for the S106 Agreement have not been fully resolved. These will be determined and agreed during the application process and in accordance with Circular 13/97 “Planning Obligations” and guidance within PPW. However it is anticipated that necessary, appropriate and reasonable contributions will be made in respect of:

1. Education, regarding any demonstrable requirements for additional teaching space or resources as a result of the proposed development within local schools serving the site.

2. Affordable housing, in terms of agreeing the proportion, mix, and tenure mix of the homes etc that will be provided on the site as affordable housing.

3. Transportation, in terms of any demonstrable and necessary improvements toward public transport, cyclist facilities or potential other highway works in the immediate area of the site.

4. Public Open Space, in terms of any demonstrable, suitable and necessary contributions to improve off site playing facilities in the local area or for the future management/maintenance of the on site open space.

11.2 The overall level and scale of contributions will be guided by Circular 13/97 and PPW and also take account of considerations relating to project viability.
12.0 CONCLUSIONS

12.1 These proposals will deliver the reuse of a vacant and underused area of land within the existing urban area of Cardiff for housing.

12.2 This will result in a far more efficient use of this valuable resource. Accordingly these proposals strongly accord with the policy requirements of PPW, the Development Plan, and the emerging DLDP.

12.3 The site is located in a highly sustainable location within the existing urban area of Cardiff, within walking and cycling distance of a wide range of surrounding employment, recreation, and retail facilities. These locations and others further afield within and beyond the City can also be easily reached by bus. The proposals accord with the sustainability requirements of PPW and the Development Plan.

12.4 The proposals are well designed and provide a range and mix of residential properties and will integrate harmoniously with the existing business park and the residential area directly to the south of the site.

12.5 The Council cannot demonstrate a 5 year supply of land, with only a 3.2 year supply. On this basis and in accordance with PPW, this application should be treated favourably and should be approved.

12.6 The proposed housing has been sensitively designed to respond to the constraints imposed by the site and its surroundings. The proposals accord with the design objectives of PPW and the Development Plan.

12.7 The proposed housing will lead to the delivery of a mixed and inclusive residential community accommodated within largely traditional, terraced, semi and detached properties with a relatively limited number of apartments. This will greatly assist the City in meeting the great need that exists for traditional forms of housing including affordable housing.

12.8 Overall, the proposals comply wholly with the Welsh Government’s policy objectives within PPW, and they also strongly comply with the policies of the existing Development Plan and the emerging LDP. Given this situation the proposals should be supported and approved.
APPENDIX 1

SITE PLAN
APPENDIX 2

ILLUSTRATIVE MASTERPLAN
Project: Cardiff Gate

Drawing Title: Illustrative Masterplan

Date: 19.06.15
Scale: 1:1,250
Drawn by: CW
Check by: BW

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