



Tall Buildings

Supplementary

Planning
Guidance



Approved by Council April 2009



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Tall buildings have the potential to add significant value to a City. Well located and well designed, they can enhance skylines and provide recognisable landmarks that can serve to promote the City on a national and international stage. A cluster of tall buildings can, if carefully located, also add to the legibility of the City, signifying arrival at the core area of the city centre. High quality tall buildings can support the Council's aspirations to create an inclusive, vibrant, thriving, sustainable and attractive city in which to live and work.

Welsh Assembly Guidance in the form of Planning Policy Wales, TAN 18, TAN 12 and associated MIPPS, support the principles of sustainable development advising that planning policies and proposals should promote resource-efficient settlements which minimise land-take; locate developments so as to minimise demand for travel, especially by the private car, and contribute to climate change by encouraging energy-efficient development. This national policy supports the principles of achieving high quality design which will enhance the quality of local environments, and through the 'Manual for Streets', improve the quality of streets and spaces. This national guidance also recognises the strengths of urban communities and supports the fostering of integrated communities through promoting mixed use development.

This SPG is intended to provide an interpretation as to how these policies can be applied at the local level and to clarify the circumstances in which the identified benefits could be achieved in Cardiff, and will be used to assess the appropriateness of planning proposals for tall buildings. This guidance is focussed on the development of tall buildings within the City Centre and Bay area of the City. Through this guidance it is identified that the development of tall buildings outside of the City Centre are unlikely to be supported unless a justification within the parameters of the guidance can be provided.

The Council in its Corporate Plan states that it will "seek to ensure that all plans for the development of Cardiff attain a high standard of sustainable design which contributes to achieving climate responsive development". As a very high density form of development, tall buildings have great potential to promote and deliver excellence in sustainability. This guidance aims to ensure that innovative design solutions are employed to deliver positive responses to the wider climate change agenda and sets targets for achieving these aspirations.


This document supplements the design policy provided in the current Development Plan for Cardiff which requires that all new development should be of a good design, have a proper regard to the scale and character of the surrounding environment and should not adversely affect the aesthetic quality of the area.

Definitions

There are a range of tall and high density buildings in Cardiff and an audit and analysis of these has been carried out as background work to this Guidance. This exercise showed a high incidence of buildings up to 6 storeys which are fairly typical of the built form of the city centre. In the city centre context, **buildings of 8 storeys and above would be considered as tall buildings** which stand above the general skyline and it is proposals of this order that this guidance seeks to address. Clearly, floor to ceiling heights differ in different types of development so a pragmatic approach to this definition will be adopted, taking into consideration the typical characteristics and context of any proposal's surroundings. This guidance therefore applies to any development of 8 storeys or more.

Outside the city centre, background buildings tend to be far lower. **Buildings which are double or more than double height of surrounding properties or significantly taller in terms of actual height and number of floors, would be considered tall in this context. Tall buildings outside the city centre are unlikely to be supported unless they can be demonstrated as meeting the locational criteria outlined below**

Various uses can be accommodated within a tall building form. These can include office development, residential uses, mixed uses, and more public uses such as university campus and hospital buildings. Mixed uses within a scheme can support the provision of active frontages to the ground floor, enlivening streets and spaces surrounding the development. The design principles set out below can generally be applied in most situations although there may be some specific design requirements that are relevant to a particular land use.

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- 2.1 The location of Tall buildings
 - 2.2 The Design of Tall buildings
 - 2.3 Affordable housing guidance/Design for living
 - 2.4 Parking Guidance
 - 2.5 Open Space requirements

The guidance set out on the following pages provides advice both in terms of the location of tall buildings and principles which must be applied to their detailed design.

Each application for tall buildings will be considered on its merits and the applicant will be required to provide a spatial/locational justification for the siting of the proposed scheme in addition to a clear overriding design justification and rationale. However, the overriding principle in determining the suitability of a location for a tall building is that it must be located in accord with principles of sustainable development.

2.1 The Location of Tall buildings

The acceptability of proposals for tall buildings in Cardiff will be assessed by having regard to the following locational criteria:

● ● ● ● Tall buildings will only be acceptable in locations that are highly accessible to a range of public transport options. (A recognised definition of easy walking distance would be 400 metres, although this may vary according to local circumstances and access to a high quality route is of equal importance). The high density nature of tall buildings and the demand placed upon the transport network by this scale of development is a major consideration in determining their appropriate location. This, in combination with the growing sustainable development agenda including aspirations for low carbon design, means that it will be unsuitable for private cars to be the predominant means of access to tall buildings. Consideration of the capacity of the existing transport network, the quality of links between the proposed site and public transport infrastructure and the feasibility of making improvements to the transport system will be important considerations in assessing the acceptability of tall buildings proposals. **For proposals in sustainable locations, reduced or zero parking provision will be sought which will ensure that the development is not dominated by its parking provision.** (see paragraph 2.4 on parking standards).

● ● ● ● Any proposals outside of these sustainable locations would only be considered positively in exceptional circumstances and particularly in the context of:

- **The trip generation and modal split anticipated in the proposal and considerations regarding low trip generating land-uses,**
- **The proximity and/or deliverability of viable and appropriate public transport measures,**
- **The proximity and/or ease of access to key facilities and services,**
- **Accessibility to and/or deliverability of other forms of sustainable transport modes i.e. cycling and walking links in less accessible locations,**
- **Their role in marking important public facilities such as churches, civic buildings and universities.**

● ● ● ● Proposals for tall buildings should make a point of focus or create a positive feature in the city skyline and where appropriate, contribute to the opening up, or effective enclosure of views and important vistas to improve the legibility of the city and the wider townscape. Buildings can have an impact both in terms of the localised street scene and in the wider strategic context. Proposals must demonstrate that there is an overriding design objective for the provision of a tall building in the proposed location and that the building is orientated to provide a clear benefit in design terms to both the local and the wider strategic townscape.”

● ● ● ● Tall buildings can also mark or draw attention to locations of civic or visual importance such as city centres and major public transport interchanges. They can also give focus, momentum and publicity to areas undergoing regeneration, subject to all other criteria being satisfied.

● ● ● ● Tall buildings will not be permitted in locations where they would overshadow or overlook adjacent properties to the significant detriment of the amenity of neighbouring occupiers.

● ● ● ● The site for a proposed tall building must be located where there is good access to community, leisure and other facilities.

● ● ● ● Any proposal for a tall building in a particular location must be sympathetic with its surroundings and have a minimal visual impact on important vistas and sensitive historic environments including:

- Archaeology, Scheduled Ancient Monuments and their setting;
- Listed Buildings, Conservation Areas and their setting;
- Other open spaces, including river corridors, their settings and views from them.

●●●● Proposals for tall buildings should generally be located within an existing cluster or form part of a proposal to create a new cluster (a cluster can be defined as a group of buildings which form a visual cohesion). The building should demonstrate the ability to raise the quality and coherence of any existing cluster. Further guidance on designing within a cluster is outlined in the design section below. There may however be exceptions where a free-standing tall building outside of a cluster can be demonstrated as providing a landmark within the street scene and skyline or at the termination of a vista.

●●●● The replacement of an existing tall building with another will not necessarily be supported unless all the criteria of this guidance can be met.

Location within Cardiff

In applying these criteria to the Cardiff context therefore:

Tall Buildings will usually only be considered positively within the City Centre and Bay area of the City in locations which are highly accessible through walking and public transport.

The City Centre and Bay contain significant areas of historic environment designated as Conservation Areas and development of tall buildings within these areas which could have a detrimental impact on the character and setting of these areas will not be supported.

Outside of the City Centre and Bay, proposals for tall buildings will not be supported unless they can demonstrate exceptional circumstances as discussed above.



2.2 The Design of Tall Buildings

●●●● Tall buildings have visual prominence in, and significant impact on the wider landscape of the City, and often take on the role of major landmarks. In this context **it is essential that the design and appearance of tall buildings are of exceptional quality.** CABE/ English heritage guidance emphasises that tall building development carries with it an increased obligation to return positive benefits to the immediate and wider environment.

In assessing this, particular attention will be focussed on four major issues:

- **The form and silhouette of the building** - this includes consideration of visual impact, and relationships with both the local context and other tall buildings.
- **The quality and appearance of the proposed materials and architectural detailing,**
- **The impact and interface at street level** - how the building contributes positively to high quality, safe, secure and legible public realm and urban design.

And;

- **The sustainable performance of the development** – how the building employs climate-responsive design.



Turning Torso – Malmö, Sweden

2.2.1 The Form and Silhouette of the Building



- **Architectural quality** – The prominence of tall buildings dictates that they must be of the highest quality in architectural form, details and materials. The proposal must be a well-articulated structure developed from a strong understanding of the site context and a clear design vision.
- **The quality of the form and silhouette** of the building is critical and includes consideration of visual impact, and relationships with both the local context and other tall buildings. Tall buildings should be elegant and slender in form and should not appear as slab like structures. The treatment of the top of the building is particularly significant given its visibility on the skyline. The quality of finish and detailing can significantly enhance the development particularly at the pedestrian level. Attention needs to be given to the treatment of antennae, aerials, roof plant, lift over runs health and safety barriers and external cleaning hoists as an integral part of the design of the development.



- **Local character & context** – The proposal must respond to the context of the site both in terms of the character at street level and in relation to other tall buildings in the vicinity. Both of these relationships need to be fully explored in an accompanying design statement.
- **Designing for Clusters** – The development of a building within an existing cluster of tall buildings or the creation of a new cluster has specific design considerations. These include identification of the relationship of the new building to an existing dominant building in the cluster and to other surrounding buildings, or the consideration as to whether there is a need for the proposal to form a new dominant building to the group. Additional tall buildings would only be acceptable if there is a distinct urban design rationale and benefit which does not prejudice other aspects of the SPG. These relationships need to be demonstrated through a skyline analysis and as the development is likely to be visible from 360° it must be assessed in this context. It is important to create a visual gap between high buildings so that they do not appear to merge as one large slab.
- **Scale and massing** – The scale and massing needs to be considered in terms of impact at street level in addition to appearance from more distant views. Bulky tall buildings with a strong horizontal massing should be avoided, with the emphasis being on creating vertically slender buildings with a clear base, middle and top.
- **Legibility** – The building must have a positive effect on the skyline and where appropriate, aid the legibility of the townscape, for example by providing a terminating landmark to a vista (without compromising other criteria) and through detailing at the pedestrian level. The building should help pedestrians find their way around the local area. The use of innovative lighting solutions can also enhance the legibility of buildings at night adding value to the city's skyline. Well designed tall buildings have the benefit of providing a positive identity for the occupiers of the building.

2.2.1 The Form and Silhouette of the Building continued...



- **Historic Context** -The proposal must respond to the historic context, including the need to ensure that the proposal will preserve and/or enhance historic buildings, sites, landscapes and skylines. Tall building proposals must address their effect on the setting of, and views to and from historic buildings, sites and landscapes. The Conservation Appraisals completed by the County Council provide further advice in assessing the key characteristics of the City's historic environment.
- **Adaptability/flexibility/future proofing** – The building must be designed to be adaptable for a range of future uses. Adaptability involves the design of buildings so that they are flexible and can be used for a variety of uses over time. The use of high quality materials result in durable buildings which can stand the test of time.
- **Amenity** - The proximity of two or more tall buildings can create significant issues of overlooking and overshadowing. Proposals adjacent to or in the vicinity of other tall buildings need to ensure that the privacy and amenity of existing and future residents and occupiers is not compromised, in addition to the implications of the proposal on existing views from neighbouring properties. Appropriate positioning and orientation of windows and habitable rooms may assist in mitigating amenity issues.
- **Civil Aviation Authority restrictions** – Consultation with the Civic Aviation Authority may be required.

2.2.2 Quality and appearance



- **Architectural Quality** - As set out in 2.2.1 High quality tall buildings should enhance the context within which they are located. The proposal must respond to all the elements of design quality as set out in this chapter to achieve a well rounded solution.
- **Quality** - Poorly designed buildings, in the wrong location, can have a detrimental impact and detract from their context. Given the visual prominence of Tall buildings it is essential that not only the architecture but the detailing in terms of materials and finish are of exemplar quality. Tall buildings can provide the opportunity for bringing in a new level of design quality into the urban landscape.
- **Materials** - Materials need to be of the highest quality and robust enough given the limited opportunities for maintenance access. Climate responsive design may provide the opportunity for the use of innovative materials but the robustness and appropriateness of such materials will need to be clearly demonstrated. Materials specification must ensure appropriate levels of counter-terrorism measures are taken. This will include, for example, the use of glazing that minimizes shattering and blast effects. See 'security ' paragraph under 2.2.3 for further advice on contacts.



2.2.3 Impact and interface at street level



- **The street interface** – The quality of development at street level is critical. At the ground floor level the development needs to enliven spaces through a mix of uses and well overlooked entrances and achieve a high quality public realm treatment around the building and as a setting for the building. The provision of high quality internal circulation space at ground floor will provide a better quality interface with the street for users of the building. Consideration must be given to the impact of the proposal on the street infrastructure and provision made to offset any identified impact. Opportunities to enhance streetscape which relates to the proposal through 'Manual for Streets' principles should be identified.
- **Accessibility** – The development must be fully accessible to all users both into and around the development and employ the principles of inclusive design ensuring a single, equal access treatment for all users. Proposals should be linked with surrounding developments and existing footpaths effectively and avoiding creating under-used routes through vulnerable areas. Support for the development to assist in achieving safe attractive and convenient routes to public transport hubs will be sought.
- **Public Art** - Opportunities for the integration of public art should be investigated in line with the Council's Public Art Strategy and SPG.
- **Parking design** – Limiting parking provision will ensure that the base floors of tall buildings are not dominated by car-parking and deliver vibrant frontages onto the street. Where parking is provided it should ideally be underground, or other uses should wrap around parking areas to screen them. Access to parking must be located to minimise disruption of pedestrian movement. Any parking provision will be required to meet the 'Park Mark' safer parking status (or equivalent).
- **Microclimate** – The development must demonstrate evidence of an acceptable impact in terms of microclimatic effects including wind tunnel effect, shadowing, solar glare and the effect of night time illumination. Sun path studies and wind tunnel analysis will be required to demonstrate this. Evidence of the assessment of wind speeds at key locations such as entrances, key pedestrian routes and public spaces will need to be provided. An explanation as to how this research has influenced design should be given in the design statement.



2.2.3 Impact and interface at street level continued...



- Security** – The proposal must demonstrate that it meets good design for security and safety, having no adverse effect on quality of life issues, but positively contributing to community safety. This can be demonstrated by using designing out crime concepts or best practice from initiatives such as the Association of Chief Police Officers ‘Secured by Design’ initiative. This approach includes principles of good natural surveillance, illumination and well defined, secure and inclusive points of access. Where vehicular access below the building is allowed, access must be strictly controlled and managed. The use of appropriate materials for security are also discussed in para 2.2.2 Quality and appearance. It is recommended that further advice is sought from the Police Architectural Liaison Officer and where appropriate a Counter Terrorism Security Advisor during the design stage. Refer to WECTU (Welsh Extremism & Counter Terrorism Unit) for further advice.
- Waste Management**– Adequate provision must be made for both the internal and external storage of composting, recycling and waste facilities within the guidelines of the Council’s ‘Waste collection and storage provision’ SPG. Appropriate access for collection will also need to be accommodated. This provision should be integrated into the design of the development and should be achieved with minimal impact on the quality and vitality of the public realm. Waste minimisation at the design, demolition and construction stage of the development must be taken into account.



2.2.4 Sustainable design



- The Welsh Assembly Government has set an aspiration to achieve ‘zero carbon’ in all development by 2011. Revised WAG Planning guidance due in spring 2009 is expected to set a sustainable performance target of ‘BREEAM Very Good’ for non-residential development and of ‘CSH code level 3’ for all residential development to assist in moving towards this aspiration. In addition WAG are expected to introduce a target for major development proposals to incorporate renewable and low carbon sources which equates to 10% of the regulated emissions in addition to the energy efficiency measures required by the Code. The Assembly consultation also highlighted that planning authorities will be provided with the flexibility to set standards higher than the national minimum on certain strategic sites.
- Tall buildings are considered by the Council to be a form of development which can reasonably be expected to achieve higher energy efficiency standards due to the landmark nature of this form of development together with the need to look towards the future-proofing of a building type which is expected to have a significant lifespan. Tall buildings provide the opportunity to become exemplars of sustainable design and by their nature may also require innovative solutions to issues such as solar glare and micro-climatic impact.

On this basis, all tall building proposals will be required to demonstrate that they have achieved a BREEAM “Excellent” rating or CSH level 4 or equivalent in the appropriate category. All proposals will be expected to demonstrate how they address these matters through the design statement.



2.2. 4 Sustainable design continued...



- **Sustainable design & Resource Efficiency** – Buildings and landscape should minimise resource use in their construction, operation and maintenance. Efficient design, the use of renewable energy systems and the sourcing of sustainable materials and construction methods can contribute to climate responsive development. Measures which can be integrated into the design of the building include improved insulation levels, efficient heating and ventilation systems (possibly servicing the whole building as opposed to independent units) and energy efficient illumination. The appropriate orientation and glazing of a tall building can maximise a range of benefits including: enabling heat gain and loss and providing natural lighting. Methods for the reduction of energy to be explored include CHP (combined heat and power), ground source heating, or connection to a local energy centre. Opportunities to manage water run-off through Sustainable Drainage systems should be investigated.



2.3 Affordable housing guidance/ Design for living

●●●● Any residential tall building proposal must result in the creation of good places to live. This needs to be demonstrated through the quality of living, amenity space and through adherence to principles relating to access, security, legibility and quality.

●●●● **An element of affordable housing will be sought on all residential or mixed use developments proposing more than 50 dwellings. The Council will normally expect that 30% of all dwellings will be affordable housing.** The Council will encourage provision of affordable housing on all developments containing 25 or more new dwellings or with a site area exceeding 1 hectare. Applications for a tall building(s) do not preclude the provision of affordable housing. The location and type of affordable housing will be determined by the particular circumstances and characteristics of the site and the development, and the economics of affordable housing provision in line with in the Supplementary Planning Guidance – Affordable Housing (March 2007).

●●●● Developers should be aware of the need to design affordable housing to the standards set out in Development Quality Requirements for New Dwellings (WAG- July 2005 or as amended from time to time) and the Welsh Housing Quality Standard.

2.4 Parking Guidance

●●●● Given the locational requirements outlined above, and the need to ensure such developments are not dominated at the ground floors by parking, existing parking standards may not be appropriate. **For proposals in sustainable locations a reduced level of parking from the County's approved standard will be sought to limit this impact.**

●●●● The revised SPG Access Parking and Circulation (expected to be approved April 2009) also sets out the situations where low or zero car developments could be enhanced by the provision of a car club, and where Travel Plans will be required to support sustainable transport measures.

2.5 Open Space Requirements

●●●● Tall buildings, particularly when grouped together, need to be complemented with a network of open spaces easily accessible by the occupiers of the proposed development. This provision will be secured through S106 agreement in accordance with the Council's open space guidance. This guidance identifies that Open space provision on high density developments in the city centre and Cardiff Bay can favour contributions towards the improvement of on site provision such as courtyards and Waterside Promenades. All waterfronts should be publically accessible and contribute to the local pedestrian network. In particular where family accommodation is proposed the courtyards must provide for quality informal recreation and relaxation in a mainly soft landscaped environment. The Waterside Promenades should provide an opportunity for active recreation, walking, jogging and cycling etc. The exact nature of provision required will depend on the particular circumstances and characteristics of the development.

●●●● Public open space provision should include consideration and resolution of any micro-climatic issues. The amenity value of communal space, private outdoor space (Balconies), roof terraces and recreational space within the building will also be considered.

Pre-application discussion



The Authority invites pre-application discussion on any proposal for a tall building in Cardiff. A demonstration of the design vision for the proposal in addition to the key impacts of the proposal through appropriate modelling and visual material can greatly assist pre-application discussion.

Guidelines regarding outline applications



The submission of an outline application for a tall building will not normally be appropriate given the requirement for detailed information to allow the application to be adequately assessed. Proposals for Tall buildings may be considered at an outline stage as part of a wider masterplan proposal subject to sufficient information regarding this element of the scheme being provided to the satisfaction of the authority.

Design Statement requirements



It is essential that tall building proposals have a clear and coherent architectural concept, integrated with an environmental and engineering strategy which should be demonstrated through comprehensive Design Statements. To this end, the experience and quality of the design team is crucial to the success of any scheme.

A design statement will be required to be submitted with any application setting out the design vision for the proposal, outlining how the above criteria has been addressed, and justifying the appropriateness of a tall building in the proposed location. The statement will also be expected to demonstrate the design teams, and ability in delivering a scheme of outstanding sustainable design.

A thorough urban design analysis will need to be included. This should:

- take into account the historic context of the wider area;
- include a character appraisal of the immediate context, identifying those elements that create local character including:
 - o Natural topography
 - o Urban grain
 - o Significant views of the skyline
 - o Scale and height
 - o Streetscape
 - o Landmark buildings and areas and their settings
- provide a visual appraisal and 3-dimensional modelling of the proposal demonstrating how it responds to this context and that of the wider city skyline. This should include key views including recent approvals.
- provide evidence of wind testing and shading diagrams with an explanation as to how these have influenced design.
- provide a security statement to include details of any advice sought from the police authority.

The design statement must also outline how the proposal will apply sustainability best practice. Details of how the proposal addresses the following criteria should be included in the design statement:

- Reduction of carbon emissions/carbon footprint
- Energy efficiency
- Sustainable construction methods used and use of recycled aggregates
- Waste management including recycling measures

The statement must give a clear understanding as to how these elements are integrated to achieve a development which meets the requirements of this guidance.

Design Commission for Wales



The Design Commission for Wales offers a design review process which can be requested by the developer or may be undertaken at the request of the Local Planning Authority. The Commissions' Design review panel welcomes consultation on proposals at the earliest stage in order to provide advice on achieving design quality in development.

Locational Criteria	<ul style="list-style-type: none"> • Located on a site which is highly accessible to a range of public transport options • Connection to cycling infrastructure and National Cycle Routes • Contribution to a cluster; • Marking or drawing attention to locations of civic or visual importance such as town centres and major public transport interchanges; • Contributing to an interesting skyline when grouped together or creating new architectural icons; • Giving focus, momentum and publicity to areas undergoing regeneration; • Providing long distance orientation points, whether singly or in groups; • Limiting overshadowing or overlooking of adjacent properties. • Provides a clear benefit in design terms to both the local and the wider strategic townscape. <p>It is unlikely that applicants will receive support for tall buildings which would cause visual harm and impact on the following:</p> <ul style="list-style-type: none"> • Listed Buildings and Conservation Areas; • Historic Building roofscapes and silhouettes • Important Views and Vistas • Views from the main historic spaces • River Frontages
Design Principles The form & silhouette of the building Quality & Appearance The street interface Sustainable Design	<p>Must meet design principles relating to:</p> <ul style="list-style-type: none"> • Architectural Quality • Local character & context • Designing for clusters • Scale & massing • Legibility • Historic context • Adaptability • Civil Aviation Authority restrictions • High quality architecture • Materials • Vibrant uses • Accessibility • Public art • Parking design • Microclimate • Security • Waste Management • Resource efficiency • BREEAM rating of 'Excellent' or CSH 'level 4' or equivalent in appropriate category
Affordable housing standards	<ul style="list-style-type: none"> • Residential development must accommodate affordable housing to defined Council standards
Parking Standards	<ul style="list-style-type: none"> • Limited parking provision in sustainable locations • SPG Access Parking and Circulation Guidance
Open Space requirements	<ul style="list-style-type: none"> • Quality on site provision informal recreation • Active provision providing access to waterfront in waterfront locations
Design Statement requirements	<ul style="list-style-type: none"> • Design rationale • Urban design analysis to include character appraisal • Full visual appraisal of the setting of the proposal in its wider context within the city skyline • Sustainable design statement • Security design statement

5.1 Appendix A: Policy Context

●●●● The Welsh Assembly Government supports the use of Supplementary Planning Guidance (SPG) to set out detailed guidance on the way in which development plan policies will be applied in particular circumstances or areas. SPG must be consistent with development plan policies and national planning policy guidance and may be taken into account as a material planning consideration in planning decisions.

●●●● High quality building design is encouraged throughout the planning policy framework:

- **A1: Planning Policy Wales** - Planning Policy Wales (2002) and Technical Advice Note (Wales) 12: Design (2002) acknowledge the role that good design in new development can play in enhancing the environment, delivering sustainable development, attracting inward investment and promoting social inclusion and well-being. Good design is not just about the physical appearance of development, but achieving sustainable forms of development that successfully respond to their local context and character.
- **A2: City of Cardiff Local Plan** - This draft guidance supplements Policy 11 (Design and Aesthetic Quality) of the City of Cardiff Local Plan (adopted January 1996), which states: 'All new development should be of good design which has proper regard to the scale and character of the surrounding environment and does not adversely affect the aesthetic quality of the area.'
- **A3: The Cardiff Unitary Development Plan** - The Cardiff Unitary Development Plan was placed on deposit in October 2003. Following introduction of the European SEA (Strategic Environmental Assessment) Directive in 2004 and subsequent up-dated guidance from the Welsh Assembly Government on development planning, the Council has sought the agreement of the Assembly to cease preparation of the Cardiff UDP and commence preparation of a Local Development Plan (LDP).

Guidance issued by the Welsh Assembly Government in respect of LDPs indicates that where a UDP has been put on deposit it may remain a consideration in development control decisions until such time as an LDP has been placed on deposit. Generally, the weight to be attached to policies in emerging UDPs depends on the stage of plan preparation, the degree of any conflict with adopted plans, and the number and nature of any objections and/or representations in support of the policy.

Policy 1B (Achieving Good Design) of the deposited Cardiff UDP states: 'Good design will be sought in all development'

Policy 2.20 (Good Design) of the deposited Cardiff UDP states: "All development will be required to demonstrate good design by:

- satisfactorily responding to local character and context;
- achieving a legible development which relates well to adjoining spaces and the public realm;
- providing a safe and accessible environment for everyone who might use or visit it;
- providing for the efficient use of resources and adaptability to changing requirements;
- satisfactorily addressing issues of layout, density, scale, massing, height, detailing and landscaping".

Representations were made at deposit, objecting to the above proposed policies.

5.2 Appendix B: Contacts

- **Cardiff Council** - Planning advice, Building Control advice, maps to download of Conservation Area Boundaries, advice on statutory considerations listed above.
www.cardiff.gov.uk
- **Development Control** - planning permission, pre-application discussions, Conservation Area and Listed Building Consent.
developmentcontrol@cardiff.gov.uk
Tel: (029) 2087 1135
- **Building Control** – Building Control regulations.
buildingcontrol@cardiff.gov.uk
Tel: (029) 2087 1363/1377/1153
- **LDP (Local Development Plan)**
developmentplan@cardiff.gov.uk
Tel: (029) 2087 3469
- **Sustainable Development**
sustainabledevelopment@cardiff.gov.uk
Tel: (029) 2087 3228
- **BRE Wales** – Provides best practice guidance on sustainable Development in Wales.
www.bre.co.uk
- **Conservation and Historic Buildings**
conservation@cardiff.gov.uk
Tel: (029) 2087 3485
- **Cadw** – The Welsh Assembly Government’s historic environment service.
www.cadw.wales.gov.uk
Tel: (01443) 336000
- **RSAW** – Royal Society of Architects in Wales is the regional organisation of the Royal Institute of British Architects (RIBA).
www.architecture.com
Tel: (029) 2022 8987
- **RICS Wales** – Royal Institute of Chartered Surveyors.
www.rics.org/wales
Tel: 029 2022 4414
- **Design Commission for Wales** – National organisation providing design review service.
www.dcfw.org
Tel: 029 2045 1964
- **Secured by Design** – Award scheme owned by the Association of Chief Police Officers Crime Prevention Initiatives (ACPO.CPI).
www.securedbydesign.com

5.3 Appendix C: Consultation Representations And Responses

- **A1.** Public consultation on the SPG was undertaken between 4th November and 30th December 2008. A press notice was placed in the South Wales Echo on 3 November 2008 and notices and copies of the draft guidance were placed in all Cardiff Libraries and at City Hall and County Hall. The draft guidance was also published on the Council's website.
- **A2.** Letters notifying that consultation was being undertaken on the draft guidance were sent to all Cardiff Councillors, the Welsh Assembly Government, Community Councils in Cardiff and the following who are known to have a general interest in planning in Cardiff, or a potential interest in this guidance:

Architectural Liaison Officer (Police)
Arup
Atkins
Baker Associates
Barratt South Wales Ltd
Barton Willmore Planning Partnership
Beazer Homes
Bellway Homes (Wales Division) Ltd
Bovis Homes
Boyer Planning
CADW ***
Cadwyn Housing Association
Cardiff Chamber of Commerce
Cardiff Community Housing Association (CCHA)
Cardiff University
CDN Planning
Centre for Housing Management and Development
CGMS Consulting
Chartered Institute of Housing in Wales
Chichester Nunns Partnership
Communities Partnerships
Community Safety Design Officer
David McLean Homes
David Wilson Homes South West
Davis Langdon and Everest
Design Commission for Wales***
Development Planning Partnership
Development, Land & Planning Consultants Ltd
DLP Consultants
DTB Design
DTZ Piedad Consulting
Eastlake Ltd
Enviros Consultancy
Environment Agency Wales
Friends of the Earth (Cymru)
Fulfords Land & Planning
GL Hearn Planning
Glamorgan and Gwent Housing Association
GMA Planning
Grosvenor Waterside
GVA Grimley

Hafod Housing Association Limited / Hafod Care Association Limited
Halcrow
Harmers Ltd
Hepher Dixon
Hodge & Co Property Holdings Ltd
Home Builders Federation
Housing Directorate
Hyland Edgar Driver
John Robinson Planning & Design
Kelly Taylor & Associates
Levvel Ltd
Lovell Partnership
Macob Construction Ltd
Madley Construction
Mason Richards Planning
McCarthy and Stone (Western Region)
Meadgate
Morgan Cole
Nathaniel Lichfield & Partners
National Federation of Builders
Northgate Info Solutions,
Novell Tullet
Persimmon Homes (Wales) Ltd
Planning Officers' Society for Wales
Redrow Homes (South Wales) Ltd
RICS Wales
Robert Turley Associates
Royal Society of Architects in Wales
RPS Group plc***
Scott Wilson
SecondSite Property
Stride Treglown Town Planning
Taff Housing Association
Tanner & Tilley
Taylor Wimpey Homes
The Design Group 3
The Planning Bureau Ltd
Town Planning & Development
United Welsh Housing Association
Wales & West Housing Association
Welsh Assembly Govt : Dept for E&T & Housing Directorate
Welsh Federation of Housing Associations
Welsh Tenants Federation Ltd
Westbury Homes (Holdings) Ltd
White Young Green Planning
Wilcon
WS Atkins Planning Consultants
Wyn Thomas Gordon Lewis Limited

- **A3.** Comments specifically or generally relevant to the draft guidance were received from the above consultees indicated *** .
- **A4.** The following table summarises the representations submitted and the changes made in response.

Chapter	Page	Comment	Response	Action
	General	The language of the document should be less tentative.	Disagree	A balance has to be made between prescriptiveness and more tentative guidance within the planning legislative context
Introduction	P4. 3 rd Sentence	The use of terms such as "gateways" is unhelpful.	Amend	'Gateway' amended to 'arrival'
	P4. 3 rd Sentence	12 storeys is an adequate definition for city centre buildings .	Disagree Cardiff is a relatively low rise city and in many places an 8 storey building would have a large impact.	Retain 8 storey as baseline
	P4.	There should be a basic requirement for mixed use in tall buildings and that this should be included in the final paragraph of page 4.	Review This requirement could not be mandatory as there are areas where mixed use would be impracticable	Redraft last para pg.4 to reference value of mixed use at ground floor
2.1 the location of Tall Buildings	P6 & 17.	The term 'transport hubs' would be better referred to as "locations which are highly accessible by public transport" as it is more precise.	Amend	Define PT hubs as : 'locations which are highly accessible to a range of public transport options'.
	P6. 1 st Paragraph	The minimum walking distance should be 400 meters.	Amend	Amend to 400m but note local circumstances may have impact on precise definition.
	P6. Gen	Tall buildings mask important public facilities and do not feel that tall buildings 'give focus, momentum and publicity to areas undergoing regeneration'.	Disagree	Tall buildings can have potential to enhance in some cases . Page 6 para 4 includes qualifying phrase : 'subject to all other criteria being satisfied'.
	P6. 1 st Paragraph	Stronger emphasis needs to be placed on the limiting parking provision	Review	Revise parking standard paragraph 2.4 to ref support for zero provision
	P7. 1 st Paragraph	Question whether clusters are needed and make reference to the existing clusters on the Taff / Ely banks	Disagree	Benefits for provision within clusters include providing symmetry, rhythm, visual grouping and enclosure, which can be more positive to the city skyline than separated locations.

	P7.	Suggest change last sentence to read "Outside of the City Centre and the Bay" to maintain continuity with the rest of the doc.	Agree	Amend to include 'and Bay.'
2.2.1 The form & Silhouette	P10. 1 st & 2 nd Paragraph	'Architectural Quality' and 'The Quality of the Form and Silhouette' paragraphs should be combined under architectural quality.	Disagree	Read clearly as separate paras.
2.2.3 Impact & interface at street level	P11. 1 st & 2 nd Paragraph	'The Street Interface' needs to make direct reference to the term 'ground floor' in the second sentence.	Agree	Reword 1st para 2.2.3 to include ground floor.
	P11. 1 st & 2 nd Paragraph	There should be a mandatory requirement for underground parking and at the very least have a wrap around design for outdoor parking.	Review wording	Mandatory requirement for underground difficult to justify in context of cost implications. Review emphasis of wording.
	P11. 1 st & 2 nd Paragraph	The use of the term 'wind tunnel effects' in the 'Microclimate section is too ambiguous and that other terms should be used.	Review	Balance of text acceptable for a planning rather than technical document.
	P12. 1 st Paragraph	'Security' omits the requirement for lower floors to provide good surveillance.	Agree	Reinforce paragraph to make reference to natural surveillance and other security principles .
2.2.4 Sustainable design	P12. 3 rd Paragraph	'Sustainable Design' needs to make reference to the CSH, the Planning for Climate Change MIPPS and WAG's 2011 zero carbon aspiration.	Review	Awaiting further 'climate change' guidance from WAG to national policy on climate change. Review wording to reflect draft guidance.
	P13.	Request for reference to Low carbon centralised heating.	Review	Too prescriptive for planning guidance.
	P13	Request that Tall building development should carry an increased obligation to deliver positive benefits to the surrounding environment.	Agree	Document sets out increased obligation to deliver sustainable development and positive benefits to the surrounding environment throughout guidance .
2.5 Open space requirements	P14.	P14. 6 th Paragraph – the open space requirements are too prescriptive.	Disagree	The density of development makes access to & quality of open space more critical and supports delivery of positive benefit to surrounding environment
	P14.	Public space should be provided where appropriate and that all waterfronts should be publicly accessible.	Agree	Revise para 2.5 to reference all waterfronts should be publicly accessible. Cross-reference to street interface para 2.2.3

P14.	Communal space or private recreation is not always required, except for family accommodation where it should be considered mandatory.	Review	The SPG does not specify outdoor amenity as essential. Add reference to family accommodation requirements.
P14.	Would like a reference to 'usable balconies/roof terraces' to be included.	Review	Include reference to value of balconies .
3.0 Requirements for submission of a planning application	P15. Outline applications that have a sufficient level of detail should be acceptable.	Disagree /Review	Complexity & impact of Tall buildings application requires a full application. The only exception is where a tall building is proposed as one component of a much larger development, in which case it may be considered at outline as part of a Masterplan proposal supported by a design statement.
P16 & 17	Reference to the DCfW review panel and summary of guidance.	Welcome	No action required
P17.	'Historic River Frontages" is too specific as issues of historic environment are dealt with sufficiently elsewhere.	Agree	'Historic' deleted.
Illustrations	General Various comments provided on illustrations: request for greater relevance to Cardiff.	Review	Illustrations amended

Applicants are advised to discuss proposals in advance of formal planning application by contacting:

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