

Date: 11<sup>th</sup> January 2024  
Our Ref: 23.201

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Dear Sir/Madam,

Town and County Planning Act 1990 (As Amended)  
Full planning application for conversion of property to provide 2 no. supported living units and associated works  
66 Cae Gwyn Road, Cardiff, CF14 1TD  
Local Planning Authority Reference: 23/02187/FUL

Asbri Planning is appointed as planning agent to First Choice Housing Association Ltd in respect of the above planning application seeking the conversion of property to provide 2 no. supported living units and associated works at 66 Cae Gwyn Road, Cardiff, CF14 1TD.

First Choice Housing Association Ltd is a "registered social landlord" based in Cardiff, who provide supported living accommodation throughout Wales and Shropshire for a range of vulnerable clients. Support to those clients is provided by a range of domiciliary care providers, usually appointed by the local authority. The term "supported living" describes a broad range of housing to support options for vulnerable people. Supported living is distinct from residential care and other schemes following basic principles whereby people have their own home, with the care and support they need to be provided completely separately. This means they are able to exercise choice over how and where they live and who supports them. Supported living empowers vulnerable people and enables them to optimise independence and lead full and values lives within their local community. Supported living can be a suitable option for vulnerable people who may have complex needs, as the support is tailored to individual needs. For some, people living on their own is most suited to their needs whilst others may prefer to share. It is agreed on an individual basis, with support hours being matched to an individual's needs, which may vary from a few hours a week to 24-hour support. The care and support received by individuals are regulated by the Care and Social Services Inspectorate Wales in Wales and the Care Quality Commission in England.

The planning application has already been submitted via Planning Portal and the submission documents are listed below.

Document/drawing (reference where applicable)	Prepared by/Drawing Reference
Application Forms	Asbri Planning
Cover Letter	Asbri Planning
Site Location Plan	(90)001
Existing Ground Floor Plan	(90)002 A
Existing Site Plan	(90)003 A

Existing Elevations	(90)004 A
Proposed Plan	(90)005 C
Proposed Site Plan	(90)006 B
Proposed Elevations	(90)007 B
Proposed Elevations	(90)008 A
Proposed Roof Plan	(90)009

The relevant application fee is £920 and will be paid by the client directly to Cardiff Council.

### Site Description

The application building site consists of an existing detached bungalow at 66 Cae Gwyn Road in Birchgrove, Cardiff. The bungalow is currently used as a residential supported living unit (Class C3b), with two existing FCHA tenants receiving permanent support from staff. Figure 1 gives an illustration of the proposed site whereas Figure 2 shows the location of the site within the wider surroundings of the area. There is currently room for one car to park along the strip of concrete that runs to the garage as shown in the Existing Site Plan (Drawing Ref: (90)003 A). Internally, there is a kitchen, dining room, living room, staff office/bedroom, bathroom and two bedrooms. To the rear of the property there is a conservatory, gazebo, garden and aforementioned garage, whereas to the front lies an area of grass enclosed by hedgerow to the east and west. 2 points of access are provided to the site, one to the north west of the main entrance and the other lies to the south west of the entrance.

The surrounding areas of the property are mainly residential, with the vast majority of properties along Cae Gwyn Road being bungalows. Along Cae Gwyn Road, there is no uniform parking arrangement. In terms of nearby facilities, the following are all within a fifteen minute walk of the site:

- Convenience store
- Train Station
- Aldi
- Lidl
- Pharmacy
- Church
- Park
- Comprehensive School; and
- Public House

The site lies just under three and a half miles north west of Cardiff City Centre, and sits fewer than two miles away from Junction 32 of the M4. The application site sits in close proximity to the A470 trunk road which joins up with the motorway. In terms of bus provision, the nearest stop lies immediately north of the site along Pantbach Road. This stop is serviced by the no.23 which operates one to two times an hour on weekdays between 8am and 10pm. The service itself terminates in Cardiff city centre where there is opportunity for onward travel. Regarding train services, the nearest stations are located in Birchgrove and Rhiwbina, circa 0.5 miles from the site. Both are serviced frequently by Transport For Wales and have services running to several destinations including Cardiff Central, Cardiff Bay, Coryton, Radyr and Ninian Park. Onward travel is possible from Cardiff Central to several destinations including Manchester Piccadilly, London Paddington, Holyhead and Milford Haven. It is possible to join up with National Cycle Route that lies to the west of the site. It is approximately a 15 minute journey from the application site.

Having reviewed the NRW Development Advice Map, the site is located within Zone A. Furthermore, the site lies outside Zones 2 and 3 within the Flood Map For Planning, and therefore is not at risk of flooding from rivers/seas, and small watercourses/surface water.

Cadw's archives show the site does not contain any historic asset. The nearest historic designation is a listed building to the north east of the site. It is a grade II listed building which comprises a Pair of Mileposts in W boundary wall to Lidl car park along Caerphilly Road circa 1km to the north east of the site

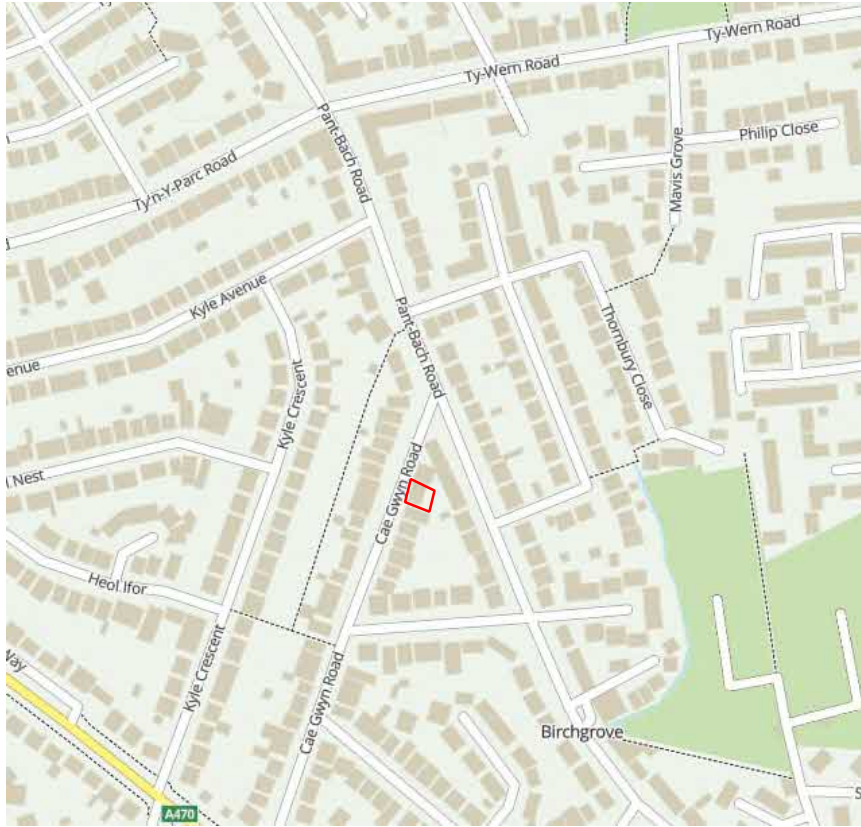
The Coal Authority Interactive Map shows the site to lie outside the Coal Mining Development High Risk Area.

A review of the adopted Cardiff Local Development Plan (LDP) reveals the site lies within the settlement boundary of Birchgrove.

Figure 1: Proposed Site



Figure 2: Site Location



### Proposed Development

This application from First Choice Housing Association seeks full planning permission for conversion of property to provide 2 no. supported living units and associated works at 66 Cae Gwyn Road, Cardiff, CF14 1TD.

In terms of external alterations to the property shown of the Proposed Site Plan (Drawing Ref: (90)006 B), the major change will involve the demolition of the existing garage in order to facilitate the conversion of the property to provide the 2 supported living units, along with the introduction of 3 parking spaces fronting onto the highway which is facilitated by a dropped kerb. Despite a reduction in garden size, this will provide sufficient amenity for future occupants. A new 1.8 metre high close boarded timber fence is to be constructed at the rear of the property in front of existing hedge, and the 1.8 metre fence is also proposed to the south of the property. In addition to this, paving is to be re-laid to achieve a level access, whilst all hedgerow to the west of the bungalow is retained.

From the proposed plan, a separate access will be provided into the new supported living unit. 1 tenant will reside in this unit, whilst receiving support from the existing supported living unit. The tenant in the new unit will have an element of independence due to the facilities that are on offer in the annex. As previously mentioned, the existing property is currently used by 2 FCHA tenants who receive full time support, and this use will remain. The additional tenant will also be able to receive support when required. The conversion will allow both units to be connected internally via the staff accommodation.

From the drawings provided, there also appears to be an extension to the existing kitchen and living room of the existing supported living unit. Furthermore, within the existing unit, the bathroom will become a storage area whereas the staff office/bedroom will be converted into a bathroom.

The external finishes shown on the proposed elevations (Drawing Ref: (90)007 B and (90)008 A) are noted below:

- New roof finish – marley interlocking tiles with marley integral solar PV;
- New PVC-U fascia and soffit colour white;
- New rainwater gutter and downpipes colour black;
- New PVC-U windows and doors
- External render retained;
- Brick plinth to match existing
- New thro coloured render

### Planning History

Available records on the Cardiff County Council website shows the site has no previous planning history.

### Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
- Cardiff Development Plan (Adopted January 2016)

In addition to the Development Plan, this document has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 11 (February, 2021), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Cardiff Supplementary Planning Guidance

### National Planning Policy

National Development Framework: Future Wales – The National Plan 2040

Future Wales – The National Plan 2040, is Wales's national development framework which sets the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate resilience, developing strong ecosystems and improving the health and wellbeing of communities.

### Planning Policy Wales Edition 11

PPW Edition 11 was adopted by the Welsh Government in February 2021 and is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications. PPW Edition 11 sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

Paragraph 3.3 of PPW states “good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area”.

Paragraph 3.6 notes “Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children. There will often be wider benefits to be gained through the sensitive consideration of such provision, for example, whilst the presence of visual cues will be invaluable in assisting those with hearing loss to engage in a noisy environment, a navigable environment will benefit all”.

#### Technical Advice Notes

PPW 11 is reinforced by 19 Technical Advice Notes (TANs) which offer more detailed guidance on a variety of issues. In respect of this application, the following TAN's are applicable:

- Technical Advice Note 12: Design (March 2016)

TAN 12 offers advice on design considerations and notes developments ought to create places with the needs of people in mind, which are distinctive and respect local character. Additionally, design should promote layouts and design features which encourage community safety and accessibility, along with concentrating upon the standard of the places and living environments of pedestrians instead of movement and parking of vehicles. Design considerations should avoid inflexible planning standards and encourage layouts which manage vehicle speed via the geometry of the road and building, as well as promoting environmental sustainability features, including energy efficiency. Finally, the design should secure the most efficient use of land including appropriate densities.

- Technical Advice Note 18: Transport (March 2007)

TAN 18: Transport (2007) recognises that the integration of land use planning and development of transport infrastructure have a vital responsibility to play in tackling environmental features of sustainable development. Influencing the setting, scale, density and mixture of land uses and new development can help address the need to shorten the length of journeys taken by individuals, all whilst allowing people to travel in a sustainable manner rather than relying on the car.

#### Cardiff Local Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning application decisions should be made in accordance with the development plan unless material considerations indicate otherwise. The statutory development plan for this site is provided by Cardiff Local Development Plan (LDP) which was adopted by the Council January 2016.

Cardiff Council's LDP Proposals map shows the site to be located within the settlement boundary provided in the plan.

Figure 3: Cardiff LDP map



The following Cardiff LDP policies are considered relevant to this proposal:

Policy Reference	Relating to
KP3 (B)	Settlement Boundary
KP5	Good Quality and Sustainable Design
KP8	Sustainable Transport
KP13	Responding to Evidence of Social Needs
KP14	Healthy Living
KP15	Climate Change
EN6	Ecological Networks and Features of Importance for Biodiversity
T5	Managing Transport Impacts

#### Supplementary Planning Guidance

The below SPG's are considered pertinent to this application:

- Cardiff Residential Extensions & Alterations
- Cardiff Residential Design Guide
- Green Infrastructure
- Managing Transportation Impacts (Incorporating Parking Standards)

## Appraisal

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section assesses the planning application in question, and addresses the scheme against the Cardiff Local Development Plan.

The key planning considerations that would arise from the proposed development are as follows:

- Principle of Development;
- Impact on Visual and Residential Amenity;
- Highways and Transport; and
- Other Material Considerations

### Principle of Development

This application concerns the conversion of property to provide 2 no. supported living units and associated works at 66 Cae Gwyn Road, Cardiff, CF14 1TD. The conversion of the property will offer an additional tenant a space where they can live independently, whilst also being able to access support from the staff in the other supported living unit where two FCHA tenants currently live.

In terms of the Cardiff Local Development Plan, the development lies within the settlement limits of Birchgrove, and therefore complies with Policy KP3(B) (Settlement Boundary). Moreover, facilities and services are situated nearby, and the reliance on cars is reduced due to good public transport connections being available nearby. As a result of this, the proposal accords with Policy KP14 (Healthy Living).

Policy KP13 (Responding To Evidenced Social Needs) aims to “develop sustainable neighbourhoods, tackle deprivation, and improve the quality of life for all”. By providing an additional supported living unit, it will offer a home for a tenant to live independently whilst being able to access support when required from the other supported living unit. The proposal will improve the quality of life for this FCHA tenant, and therefore the proposal accords with Polic KP13.

Welsh Government’s Climate Change Minister stated in May 2022 that the Government aims to increase the total stock of extra care housing in Wales by up to a third over the next four years, as well as help people with a learning disability, autism spectrum disorder and other neurological conditions live independently, where possible, in their own home. FCHA fully supports the principles outlined within the Welsh Government’s ‘Policy and Practice for Adults with a Learning Disability’ (2007) which states that all people with a learning disability are full citizens, equal in status and value to other citizens of the same age, with a vision to provide high quality bespoke accommodation, tailored to individual needs. Based on the above and the urgent call for action across the country, it is considered that there is an identified need for the proposed development which will assist with service pressures.

The application accords with surrounding land use that is dominated by residential dwellings, and Cae Gwyn Road itself is mostly made up of bungalows. Converting 66 Cae Gwyn Road to provide a space for an additional tenant will contribute towards supported living accommodation provision in the area, whilst further strengthening the operations of FCHA within South Wales. This use will be wholly compatible with the area, taking into consideration the established character of the neighbouring location.

Discussions with the LPA have taken place on whether the proposals would constitute a change of use to a residential care home under a C2 use class. The level and intensity of care being provided is not of a scale that it should be considered a care home. There will be no noticeable difference in the way the property operates in comparison to the residential homes along Cae Gwyn. Comings and goings will be of a similar level to a residential home. For all intents and purposes the property is residential.



Whilst the proposal would result in the creation of 2 independent living units, essentially these could be viewed as two flats, they are interconnected and share care staff. Viewing the proposal as the creation of 2 living units the proposals would be considered acceptable given that the intensity of use of the property would be compatible with the residential context in which the site sits.

This application complies with LPD Policies KP3(B), KP13, and KP14 as the proposal lies within settlement limits whilst responding to the housing need within Cardiff. Furthermore, the site is located within a sustainable setting, with the nearest bus stop a short walk away along Pantbach Road, whereas the closest train stations are only half a mile from the site. The site is surrounded by several facilities and services including a comprehensive school, pharmacy, park church and supermarket. In this respect, it can be seen that the proposed development accords both with policy and the character of the local area and should therefore be considered acceptable in principle.

#### Impact on Visual and Residential Amenity

The proposed conversion has been designed to have minimal impact upon visual and residential amenity. Having viewed the plans, internal and external alterations are proposed to the property. The existing property will be converted to allow for an additional supported living unit within the curtilage of the site.

PPW Edition 11 states “the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process and expressed, when appropriate, in a design and access statement”.

It is evident that the supported living use is fully compatible with surrounding land use due to it being residentially dominated, which due to its modest scale would not lead to any unacceptable harm to the living conditions of the occupants of adjacent properties, or the general amenity and character of the area.

Future Wales – The National Plan 2040 echoes the above, “irrespective of location or scale, the design and micro-siting of proposals must seek to minimise the landscape and visual impact, particularly those in close proximity to homes and tourism receptors”. The development by virtue of its precise scale, design, massing and use of materials will not have any adverse visual impact upon nearby dwellings. As the proposal is considered to be of “a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces”, it is in accordance with LDP Policy KP5 (Good Quality and Sustainable Design).

#### Highways and Transport

The site lies less than two miles away from Junction 32 of the M4. The application site sits in close proximity to the A470 trunk road which joins up with the motorway. In terms of bus provision, the nearest stop lies immediately north of the site along Pantbach Road. Regarding train services, the nearest stations are located in Birchgrove and Rhiwbina, circa 0.5 miles from the site.

Policy KP8 (Sustainable Transport) aims to reduce reliance on cars, whilst promoting the use of sustainable transport and active travel methods. As mentioned previously, there are several services and facilities within walking distance of the site that staff and tenants could visit. The proposal complies with Policy T5 (Managing Transport Impacts), due to it addressing the demand for travel and its impacts, whilst contributing to reducing reliance on the private car

As part of Policy KP5 (Good Quality and Sustainable Design), any proposal should offer “a healthy and convenient environment for all users that supports the principles of community safety, encourages walking and

cycling, enables employment, essential services and community facilities to be accessible by sustainable transport and maximises the contribution of networks of multi-functional and connected open spaces to encourage healthier lifestyles". As has been mentioned previously, the site is easily accessible via bus and train, and there are several facilities and services nearby that can be accessed on foot. The proposal aims to improve health by virtue of its sustainable location, making it accessible via bike and walking. As a result of this, the proposal accords with Policy KP14 (Healthy Living).

The parking area situated along Cae Gwyn Road is adequate, with three spaces provided in total. The development provides for parking and manoeuvring within the site so that vehicles would be able to park off the highway. The visual impact of providing these spaces in front of the property is considered to be minimal, and there appears to be no uniform parking arrangement along Cae Gwyn Road.

In terms of the additional traffic associated with the proposal, as acknowledged above the traffic movements will largely be as expected for a family dwelling with the additional movements caused by staff members being limited. Tenants at the property are not able to drive. This is due to a maximum of 2 staff being present at the property, with 3 parking spaces available in total. Car sharing by staff would increase the likelihood of spaces for other users, whilst the closest bus stop is a short walk away, ensuring the opportunity to travel in a sustainable fashion for employees. In summary, the goal is for all three spaces at the property to be used but no more than that as it would have a detrimental impact upon on-street parking within the area. In order to further encourage sustainable travel by staff in the future, cycle storage facilities and electric vehicle charging points ought to be considered on-site.

Having considered the above, the proposal is deemed to be in accordance with LDP Policies KP5, KP8, KP14 and T5.

#### Other Material Considerations

##### Biodiversity

Having compared the existing and proposed plans, the garage within the application boundary is proposed to be demolished in order to facilitate the creation of an additional supported living unit. Having consulted an ecologist, due to the insignificant scale of the garage, it is not considered to be of any bat potential. The architects have produced elevational drawings showing 2 bird boxes and 3 bat boxes will be installed as part of the proposal. This biodiversity enhancement measure proposed protects and enhances the ecological networks associated with the site, and consequently the proposal complies with Policy EN6 (Ecological Networks and Features of Importance for Biodiversity).

##### SAB

The proposal does not involve a new impermeable construction area above 100sqm as such SAB does not apply. The gross internal area of the new supported living unit is circa 71m<sup>2</sup>.

##### Conclusion

Asbri Planning is appointed as planning agent to First Choice Housing Association Ltd in respect of the above planning application seeking the conversion of property to provide 2 no. supported living units and associated works at 66 Cae Gwyn Road, Cardiff, CF14 1TD.

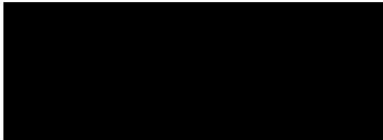
The proposed conversion will allow an additional FCHA tenant to live at the property courtesy of the new supported living unit. They will have their own bedroom, bathroom, kitchen/living room and will have an independent access to the annex. In addition to this, they will also be able to receive support from the existing supported living unit where there are staff 24/7 who care for two existing tenants. The use proposed is compatible with the surrounding area that is surrounded by residential dwellings, and lies in close proximity to the A470 trunk road. There are several

services/amenities within walking distance of the site, and Cardiff city centre is a short drive away. In terms of public transport, the site is well connected with both bus and train station nearby that receive a frequent service.

The proposal fully accords with adopted LDP policies, with policies KP5 and KP13 of particular relevance. Moreover, it will not give rise to any substantial adverse impacts upon visual amenity, highway safety, biodiversity and SAB. The applicants established themselves in 1988, and offer quality accommodation solutions for people with disabilities, veterans and additional needs across Wales and Shropshire. Their mission is to improve *“quality of life through provision of quality, bespoke accommodation that enables tenants to achieve independence, fulfil their potential and optimise enjoyment of life, and allows staff and family to be part of that journey”*. This proposal will allow them to further enhance their operations in South Wales.

In conclusion, the proposal represents an appropriate conversion that fully accords with the overall spirit of relevant planning policies, and there are no material considerations which should prevent the planning application from being determined in accordance with the relevant planning policy framework.

I trust that you have the requisite documentation in order to enable you to validate this application. Nevertheless, if you require any further information, please do not hesitate to get in touch with me.



**Iwan Rowlands – Graduate Planner**  
**Asbri Planning Ltd**