

# **Planning Statement (inc. Green Infrastructure Statement)**

**On behalf of Harriet Street Ltd**

**fmr Welsh Evangelical Church,**

**110 Harriet Street,**

**Cardiff**

**January 2024**

# CARNEYSWEENEY

## PLANNING

### Document control

|                    |                       |
|--------------------|-----------------------|
| <b>Prepared by</b> | Clodagh Meehan Macken |
| <b>Checked by</b>  | Rob Mitchell          |

# Contents

|            |   |           |
|------------|---|-----------|
| <b>1.0</b> | <b>Introduction &amp; Background</b> .....                | <b>1</b>  |
| 1.1        | Background.....   | 1         |
| 1.2        | Report Structure.....                                     | 1         |
| <b>2.0</b> | <b>The Proposed Development</b> .....                     | <b>2</b>  |
| 2.1        | The Application Site and surroundings.....                | 2         |
| 2.3        | Planning History.....                                     | 3         |
| 2.4        | The Proposed Development.....                             | 3         |
| 2.5        | LPA Pre-Application Consultation.....                     | 3         |
| 2.6        | Pre-application Consultation (PAC).....                   | 4         |
| <b>3.0</b> | <b>Planning Policy Context</b> .....                      | <b>5</b>  |
| 3.1        | Introduction.....   | 5         |
| 3.2        | Future Wales: The National Plan 2040 (February 2021)..... | 5         |
| 3.4        | Cardiff Local Development Plan (adopted 2016).....        | 6         |
| 3.5        | Other Material Considerations.....                        | 8         |
| <b>4.0</b> | <b>Principal Planning Considerations</b> .....            | <b>12</b> |
| 4.1        | Introduction.....   | 12        |
| 4.2        | Principle of Development.....                             | 12        |
| 4.3        | Transport.....  | 14        |
| 4.4        | Design, Appearance and Landscaping.....                   | 15        |
| 4.6        | Ecology.....  | 16        |
| 4.7        | Trees.....  | 16        |
| 4.8        | Green Infrastructure Statement.....                       | 16        |
| 4.9        | Flood risk/Drainage.....                                  | 17        |
| 4.10       | Waste Management.....                                     | 18        |
| 4.11       | Economic Benefits.....                                    | 18        |
| <b>5.0</b> | <b>Summary and Conclusions</b> .....                      | <b>19</b> |

## List of Appendices

Appendix A – Site Layout Plan



## **1.0 Introduction & Background**

### **1.1 Background**

1.1.1 This Planning Statement (PS) has been prepared by CarneySweeney (CS) on behalf of the applicant, Harriet Street Ltd, in support of a full planning application for the demolition of the former Welsh Evangelical Church, and development of a short/long stay 17No. bed Aparthotel (Class C1/sui generis) with Food and Drink (Class A3) and Community Space (Class D1/Sui generis) and all associated development at Harriet Street, Cathays, Cardiff.

1.1.2 This report explores the planning merits for the proposal, through the consideration and assessment of key national & local planning policies and material considerations.

### **1.2 Report Structure**

1.2.1 The report assesses the requirements of local and national retail planning policy relevant to this location and is structured as follows:

- Section 2: describes the site and surrounding context, relevant planning history, the proposed development, and pre-application consultation;
- Section 3: sets out the local and national planning policy context;
- Section 4: address the principal planning considerations; and
- Section 5: provides a summary of conclusions.

1.2.2 This Statement is accompanied by a suite of technical reports, including a Pre-Application Consultation (PAC) Report, Design & Access Statement (D&AS) and application drawings which are referenced where appropriate.



## 2.0 The Proposed Development

### 2.1 The Application Site and surroundings

- 2.1.1 The application site is outlined on the submitted Site Location Plan. It extends to approximately 0.05ha and is located at a corner plot at the junction of Harriet Street and Rhymney Terrace/Rhymney Street, Cathays. The site is currently occupied by the former Evangelical Church building which is vacant and surplus to requirements.
- 2.1.2 The existing building is **not** statutorily listed or locally listed. The site **does not** lie within a conservation area or adjacent to any designated heritage assets.
- 2.1.3 The site's immediate surroundings are predominantly residential with terraced housing fronting Harriet Street, Rhymney Terrace and Rhymney Street. Most of the surrounding dwellings are registered and understood to be in use as Houses in Multiple Occupation (HMO).
- 2.1.4 Crwys Road / Woodville Road District Centre (as designated within the Cardiff Local Development Plan (LDP) Policy R4.5), lies approximately c.170m from the site on foot. There is a pedestrian path immediately adjacent to the site (between 6 Rhymney Terrace and 8 Rhymney Terrace) which provides quick, convenient access onto Crwys Road. The centre is also accessible on foot via Rhymney Terrace and Woodville Road.
- 2.1.5 In addition, Albany Road / Wellfield Road District Centre (Policy R4.1) lies approximately 260m on foot from the site; and City Road District Centre (Policy R4.2) lies a c.350m walk from the site. The site benefits from excellent access to range of local amenities, including shops, restaurants, cafes, takeaways, etc, and is in a highly accessible and sustainable location.
- 2.1.6 The site lies entirely within Flood Zone A i.e. considered to be at little or no risk of flooding as outlined on the NRW Development Advice Map. Within the draft TAN 15 Flood Map for Planning, the site does not lie within a flood risk zone. The site does not lie in an Air Quality Management Area (AQMA).
- 2.1.7 The site is not affected by any ecological or landscape designations. The site and its immediate surroundings are not affected by any TPOs.



## 2.3 Planning History

- 2.3.1 A review of the Council’s planning history lists one historic permission for the alteration and extension of existing entrance to church to form disabled access and toilets, which was approved 5th June 1998 (ref: 98/00585/W).

## 2.4 The Proposed Development

- 2.4.1 It is proposed to demolish the existing vacant church building and develop an up-to three-storey aparthotel (Class C1) to provide 17no. bed apartments, with coffee shop (Class C3) and community space (Class D1) at ground floor level. Associated off site public realm improvements are proposed.

- 2.4.2 No off-street car parking is proposed, in accordance with the Council’s Parking Standards (i.e. Class C1 use in Central Area). Cycle parking will be provided in accordance with adopted standards.

- 2.4.3 A servicing bay is proposed, to facilitate delivery and servicing of the building as well as providing a pick up/drop off location for guests.

- 2.4.4 Please refer to the enclosed drawings for further details.

- 2.4.5 As for the operation of the proposed development, the applicant, Harris Homes (Harriet Street Limited) is a long-established Cardiff based landlord with over 50 high end properties which are fully managed. Harris Homes (Harriet Street Limited) employs an internal team of full-time staff including a maintenance team, who provide services to tenants 24/7. Harriet Street Limited are now looking to expand their business into serviced accommodation to combine an onsite/offsite operation, meaning staff will be present on site on a daily basis and available for out of hours issues.

- 2.4.6 The proposed café use will either be managed in house or in partnership with a charity. The ground floor community space can also be utilised for local events such as film nights and fitness classes. The church group and other local groups will also be able to hire the space when required on competitive rates. It is envisaged that the site will become a landmark development for Cathays, improving the community offering, streetscape and offering parents of students and other visitors to Cardiff somewhere modern, purpose built and well-managed to stay in.

## 2.5 LPA Pre-Application Consultation

- 2.5.1 The application submission follows discussions with Cardiff Council planning officers initiated in February 2023 whereby initial draft proposals were formulated and issued to the LPA for comment. From the outset of discussions, the proposals sought to secure an efficient reuse of the site, delivering high-quality designed building, incorporating community facilities, and one which safeguards neighbouring residential amenity.



2.5.2 Following a meeting with officers and local Ward Councillors in March 2023, a formal pre-application consultation response was received from the LPA in April 2023 providing advice covering the following points:

- Site falls within the settlement boundary and has no policy designation.
- LDP Policy EC5 permits proposals for hotel development within the Central Area of the city centre. LDP Policy C2 permits proposals which involves the loss or change of use of buildings currently used of last used for a community facility in appropriate circumstances.
- Principle of the proposal is considered acceptable. Justification for the demand of such use should be provided and consideration be given within the design of development should any alternative future use of the premises be required.
- The scale and form of the proposal is generally considered acceptable with no in principle concerns.
- Preliminary Roost Assessment (PRA) should be undertaken to determine the status of bats.
- Cycle parking required in line with adopted requirements.
- Tree survey required to assess off-site trees in proximity to the site.
- Application will need to demonstrate neighbouring residential amenity is safeguarded.
- Proposals that enhance landscaping to mitigate the effects of climate change should be considered.
- Appropriate planning obligations to be sought where appropriate.
- Separate SAB surface water drainage approval required.

## **2.6 Pre-application Consultation (PAC)**

2.6.1 The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (“the 2016 Order”) sets out the requirements to undertake pre-application consultation in respect of all planning applications for major development. Following LPA consultation, public pre-application consultation was carried out prior to application submission.

2.6.2 The application is accompanied by a Pre-Application Consultation Report (PAC) which details the extensive pre-application consultation carried between, which included meetings with local Ward Councillors, and consultation with statutory consultees. The PAC Report responds to the pre-application consultation; and details how feedback is addressed in the application proposals.

2.6.3 Further details are provided in the PAC report which accompanies the application.



## 3.0 Planning Policy Context

### 3.1 Introduction

- 3.1.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that: “If regard is to be had to the Development Plan for any purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the Plan unless material considerations indicate otherwise”.
- 3.1.2 The statutory development plan for the application site comprises Future Wales: The National Plan 2020 and the Cardiff Local Development Plan (LDP) (adopted 2016).
- 3.1.3 Material considerations at a local level include relevant Supplementary Planning Guidance. Other material considerations at a national level include Planning Policy Wales and relevant Technical Advice Notes (TANs). The policies of relevance to the proposed development at both a local and national level are considered in detail below.

### 3.2 Future Wales: The National Plan 2040 (February 2021)

- 3.2.1 Future Wales is the Welsh Government’s highest tier of development plan in Wales. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole. Under policy 1 of this document, ‘where Wales will grow’, the Welsh Government supports sustainable growth in all parts of Wales. In the three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas include **Cardiff**, Newport and the Valleys.
- 3.2.2 Policy 2 guides that the growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure.
- 3.2.3 One of Future Wales’ Strategic Placemaking Principles is the delivery of a mix of uses. To create activity throughout the day and enable people to walk and cycle, rather than being reliant on travelling by car, places should have a rich mix of residential, commercial and community uses within close proximity to each other. Urban growth and regeneration should integrate different uses within neighbourhoods (page 66, FW).





### 3.4 Cardiff Local Development Plan (adopted 2016)

3.4.1 The Cardiff Local Development Plan (LDP) provides a framework for delivering sustainable development in Cardiff up to 2026.

3.4.2 The relevant policies in the LDP include the following:

**KP3(b) – Settlement Boundaries.** The site lies within the Cardiff settlement boundary.

**KP5 – Good Quality and Sustainable Design,** which requires all new development to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities.

**KP6 – New Infrastructure** – Development must provide or contribute towards essential infrastructure required as a consequence of the development.

**KP7 – Planning Obligations** – will be sought to mitigate impacts related to the development, assessed on a case by case basis.

**KP8 – Sustainable Transport,** which ensures developments are integrated with transport infrastructure in order to, inter alia, reduce travel demand and reliance on cars.

**KP12 – Waste,** which ensures all new appropriate development includes provision for storage, recycling and management of waste.

**KP13 – Responding to Evidenced Social Needs,** which seeks the development of sustainable neighbourhoods, through, inter alia: Encouraging the provision of a full range of social, health, leisure and education facilities and community infrastructure for both existing and new communities that are accessible to all by walking and cycling and public transport.

**KP14 – Healthy Living,** which seeks to reduce health inequalities and encourage healthy lifestyles, including by supporting development which provide for active travel, accessible and usable green spaces.

**KP15 – Climate Change** – Development should take into account reducing carbon emissions and promoting energy efficiency, to mitigate against effects of climate change.

**EC5 – Hotel Developments** – proposals will be permitted within the Central and Bay Business Areas of the city centre; in appropriate locations for the conversion of suitable residential or commercial properties; at other locations within the urban area, if there is no need to preserve the site for its existing or allocated use. Proposals will be subject to scale, location, design, amenity and transportation considerations being acceptable.

**EN7 – Priority Habitats and Species** – Development that would have a significant adverse effect on protected habitats and species will only be permitted where the need for the development outweighs



the nature conservation importance of the site; there are no satisfactory alternative locations for the development; and effective mitigation is provided.

**MD7 – Environmental Protection** - Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment.

**EN10 – Water Sensitive Design** – Developments should apply water sensitive urban design solutions such as SUDS.

**EN13 – Air, Noise, Light Pollution and Land Contamination - Development will not be permitted** where it would result in unacceptable harm to health and local amenity because of air, noise, light pollution or contamination.

**T1 – Walking and Cycling** – To enable people to access jobs and services by walking and cycling, the Council will support developments with inter alia high quality, sustainable design; connections to the strategic cycle network; safe, convenient and attractive walking and cycling connections to existing developments, jobs and services; supporting facilities including secure cycle parking.

**T5 – Managing Transport Impacts** – Where necessary, safe and convenient provision will be sought in conjunction with development for inter alia pedestrians, disabled people, cyclists, powered two-wheelers, public transport, access and traffic management, car parking.

**R8 – Food and Drink Uses** – are most appropriately located in the city centre; Cardiff Bay Business Area; and District and Local Centres. Subject to amenity considerations, highways, crime and fear of crime, and harm to shopping role and character of centres. Food and drink uses are unlikely to be acceptable in residential areas, where they would cause nuisance and loss of amenity.

**C1 – Community Facilities** – new and improved community facilities, health and religious facilities will be encouraged, providing the facility is readily accessible to local community and served by public transport, walking and cycling; would not unduly prejudice local amenity; would not detract from character and appearance of a property or locality; would not result in unacceptable traffic/parking problems; and be designed with flexibility and adaptability to accommodate additional community uses.

**C2 – Protection of existing community facilities** – proposals involving the loss or change of use of community facilities buildings will only be permitted if alternative provision of equal quality and scale is provided; or if it can be demonstrated that existing provision is surplus to the community's needs.

**C3 – Community Safety/Creating Safe Environments** – All new development shall be designed to promote a safe and secure environment and minimise crime.

**W2 – Provision for Waste Management Facilities** – Where appropriate, provision will be sought for facilities for the storage, recycling and other management of waste.



### 3.5 Other Material Considerations

#### The Well-Being of Future Generations (Wales) Act 2015

3.5.1 The Well-Being of Future Generations (Wales) Act 2015 requires “public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”. The Act sets out seven ‘well-being’ goals as follows:

1. A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
2. A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
3. A healthier Wales: A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
4. A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
5. A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
6. A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
7. A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

3.5.2 Within the Act, sustainable development is defined as follows: “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.

3.5.3 The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.



**Planning Policy Wales (PPW) Edition 11 (February 2021)**

- 3.5.4 In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, is “to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales”.
- 3.5.5 PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of ‘placemaking’ should be at the heart of the planning system. It is stated at Paragraph 2.8 that development proposals “must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act’s Sustainable Development Principle”. Paragraph 2.9 goes on to clarify that “The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making”.
- 3.5.6 PPW defines placemaking as follows: “Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well-being in the widest sense”.
- 3.5.7 A set of ‘national sustainable placemaking outcomes’ are outlined within PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:
- Creating and Sustaining Communities
  - Making Best Use of Resources
  - Maximising Environmental Protection and Limiting Environmental Impact
  - Growing Our Economy in a Sustainable Manner
  - Facilitating Accessible and Healthy Environments
- 3.5.8 It is stated at Paragraph 2.15 that “The outcomes provide a framework which contains those factors which are considered to be the optimal outcome of development plans and individual developments”.
- 3.5.9 Paragraph 2.20 clarifies that “not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can



be improved or enhanced to promote wider well-being. It is for developers and planning authorities to identify these opportunities and act upon them”.

**Economic Development Policy**

3.5.10 Paragraph 5.4.1 states that “For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes”. Paragraph 5.4.2 goes on to confirm that “Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services”.

3.5.11 In assessing the sustainable benefits of development paragraph 2.28 states local planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process. Economic considerations include:

- The numbers and types of jobs expected to be created or retained on the site;
- Whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment;
- A consideration of the contribution to wider spatial strategies, for example for the growth or regeneration of certain areas.

**Green Infrastructure**

3.5.12 The use of the stepwise approach in demonstrating green infrastructure enhancement is made explicit in PPW Chapter 6.

3.5.13 The first priority is to avoid damage to biodiversity in its widest sense. Where there may be harmful environmental effects, the LPA will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered. Applicants, in discussion with planning authorities must seek to minimise the initial impact on biodiversity and ecosystems.

3.5.14 Where, after measures to minimise impact, biodiversity and ecosystems could still be damaged, or lost through residual impacts, the proposed development should mitigate that damage. Mitigation measures must be put in place to limit the negative effects of a development.

3.5.15 All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed). Even if the biodiversity value has been maintained, there must still be a pro-active process to look for and secure enhancement through the design and implementation of the development.



## Technical Advice Notes

3.5.16 Technical Advice Notes (TANs) are documents that provide a detailed planning advice to Local Planning Authorities (LPAs) and the LPAs should take them into account when preparing a development plan and TANs should be read in conjunction with the PPW.

3.5.17 The following technical advice notes are also relevant to the application site:

- Technical Advice Note 4: Retail and Commercial Development (2016)
- Technical Advice Note 12: Design (2016)
- Technical Advice Note 18: Transport (2016) -
- Technical Advice Note 23: Economic Development (2014)



## 4.0 Principal Planning Considerations

### 4.1 Introduction

4.1.1 This section addresses principal planning policy matters relating to the proposed development, namely:

- Principle of Development
- Transport
- Design, Appearance & Landscaping
- Ecology/ Trees
- Green Infrastructure
- Flood Risk/ Drainage
- Waste Management
- Economic Benefits

### 4.2 Principle of Development

4.2.1 The site lies within the settlement boundary and is undesignated in land use terms. The site is previously developed (brownfield) land, the reuse of which is advocated. The site has previously been in community use but is now vacant and unused; the former church building is surplus to requirements.

4.2.2 Policy C2 relates to the protection of existing community facilities. The existing church building is not statutory nor locally listed and it does not lie within a conservation area. Its retention and reuse for the development proposed is not practically or financially feasible or viable as it is not capable of adaptation for the development proposed. The proposed demolition does not raise any heritage related policy conflict.

4.2.3 It is material to note the owner of the church building is supportive of the redevelopment proposals; the church organisation secures a capital receipt from the site's disposal to allow community reinvestment, and replacement community space provision forms part of the proposed redevelopment.

4.2.4 The proposals include the reprovision of a modern, flexible community space at ground level on site (this is proposed to be available to the public e.g., including the current church organisation, other religious organisations and wider community groups etc). Moreover, we understand there is suitable



alternative existing church provision in the wider local area. These elements all ensure the proposals will not lead to any deficit of community provision.

4.2.5 Accordingly, the redevelopment will not have a detrimental impact on existing community facilities in accordance with LDP Policy C2.

4.2.6 In respect to the proposed community space on site, Policy C1 states new and improved community facilities will be encouraged, providing:

- the facility is readily accessible;
- would not unduly prejudice local amenity;
- would not detract from character and appearance of a locality;
- would not result in unacceptable traffic/parking problems; and
- be designed with flexibility and adaptability to accommodate additional community uses.

4.2.7 Careful design ensures the proposed development meets all of the above policy criteria.

4.2.8 Technology such as security cameras and noise alert systems will be utilised to protect the safety and amenity of neighbours as well as future visitors to the aparthotel.

4.2.9 The proposal seeks to bring the site back into beneficial use for a hotel-led mix of uses. Criteria iii) of Policy EC5 states such development will be permitted at [other] locations within the urban area, if there is no need to preserve the site for its existing or allocated use, assessed against the relevant policies of the plan and subject to considerations of scale, location, design, amenity and transportation being acceptable.

4.2.10 The church is surplus to requirements and a modern, versatile alternative community space is proposed. The proposed high quality Aparthotel concept will out-compete poor-quality HMO provision in the vicinity and should help counteract the proliferation of Airbnb lettings; this will assist with wider efforts to return local housing to the residential market by offering a better serviced accommodation in Cathays.

4.2.11 The community space proposed is commensurate in size to the existing church hall proposed to be replaced. It is the developer's intention to make the community space available to the Church community group as well as other local community groups for hire at competitive rates when required. A flexible ground floor space is proposed to incorporate a coffee shop with the adjoining area available for hire for e.g. health & fitness (yoga), occasions, meetings, exhibitions etc.

4.2.12 The site is readily accessible; it lies within easy walking distance of a number of district centres in a highly sustainable location (e.g. within 200m of Crwys Road centre). TAN 4 advises in the absence of available and suitable in-centre sites preference should be given to brownfield sites that are well connected to





the existing centre and accessible by a variety of means of transport, particularly walking, cycling and public transport.

4.2.13 The development is anticipated to benefit local businesses on Crwys Road. The site is also near to both Roath and Bute Park and is considered preferable to accommodate the development by virtue of its highly accessible location within easy walking distance of three designated district centres in accordance with Policy EC5.

4.2.14 As advised at pre-application stage officers consider the principle of the proposed redevelopment to be acceptable. The proposed redevelopment is considered to accord with policies C1, C2 and EC5 of the LDP.

### 4.3 Transport

4.3.1 As outlined above, the site is readily accessible, within easy walking distance of nearby district centres. The site lies in close and convenient proximity to bus routes. Moreover, it is important to note the Cardiff Metro will transform the way people travel around the Cardiff Capital Region. It will provide faster, more frequent services using trains, buses and light rail. The site lies within c.10 walk of Cathays station which lies on the Metro network and will benefit from Metro related infrastructure improvements to be delivered in the coming years.

#### Parking

4.3.2 In terms of car parking the SPG standards guides that hotel development should be car-parking free within this central location. Accordingly, no on-site provision is proposed. A policy-compliant level of cycle parking is proposed to serve the site.

4.3.3 The application site is located within a Controlled Parking Zone (CPZ) C1. On street parking restrictions apply throughout the CPZ.

4.3.4 Adjacent to the site, on Rhymney Street, there are 8 parking bays that between 8am and 6pm are for permit holders or otherwise restricted to 2 hour stays with no return within 2 hours. The 8no. spaces adjacent to the site are proposed to be removed to deliver public realm and landscaping improvements, as detailed on the proposed site layout plan.

4.3.5 Accordingly, parking stress surveys have been undertaken. The results of the surveys are provided in full in the accompanying Transport Statement prepared by Acstro. In short, there are 29 no. spaces in total (including the 8no. adjacent to the site) with identical restrictions on Rhymney Street and a total of 126 within a 2-minute catchment area of the site. The surveys find that 8 to 9 of these spaces in Rhymney Street and 27 to 29 of the spaces within the survey catchment area were unoccupied. The surveys demonstrate the proposed loss of the 8no. spaces adjacent to the site can be tolerated with the



remaining 21no. spaces in Rhymney Street and 118no. spaces in the survey catchment area with identical restrictions sufficient to accommodate demand.

4.3.6 Servicing of the development is proposed from a new servicing bay to be introduced in the off-site area along Rhymney Street and can be managed by way of a delivery/servicing management plan. The servicing requirements of the development are anticipated to be materially similar to that of the existing permitted uses of the building under Use Class D1.

4.3.7 The proposal will support and encourage public transport modes and reduce reliance on the private car, in accordance with LDP Policies KP5, KP8, KP14 and T1.

4.3.8 For further details please refer to accompanying Transport Statement (inc. Parking Surveys).

## 4.4 Design, Appearance and Landscaping

4.4.1 The design merits of the proposed redevelopment are set out in detail in the accompanying **Design & Access Statement**.

4.4.2 In respect to residential amenity the development's scale and draft design seeks to safeguard neighbouring residential amenity in accordance with Policies KP5 and EC5 of the local plan. The application drawings outline the development's layout, scale and massing.

4.4.3 The proposed new building is considered to be an appropriate scale for a corner plot in a tight knit urban location, where to make the best use of brownfield land the local plan seeks the delivery of development at the highest practicable densities.

4.4.4 In considering residential amenity, the site is bound by dwellings along Harriet Street and Rhymney Street. In terms of overlooking, the new building is designed to avoid any unacceptable overshadowing of neighbouring amenity areas and/or habitable rooms.

4.4.5 It is important to consider that in living within a densely developed residential area there is a reasonable expectation that outlook from a property will be onto other neighbouring properties in close proximity. However, internal layouts must be considered, and windows must be placed, carefully. Whilst a hotel use is proposed the Council's Residential Design Guide offers sound general guidance in respect to the safeguarding of neighbouring residential amenity. Shadow analysis has been undertaken which demonstrates the scheme does result in unacceptably adverse obstruction of light.

4.4.6 Public realm improvements are proposed as outlined on the Site Layout and detailed in the Design & Access Statement.

4.4.7 The proposed redevelopment is considered to accord with LDP Policy KP5 with respect to delivering high quality, sensitive and sustainable design.

4.4.8 For further details please refer to the accompanying Design & Access Statement.



## 4.5 Ecology

- 4.5.1 As per the recommendations of the LPA's pre-application response, a Preliminary Roost Assessment (PRA) was undertaken at the church in June 2023. The PRA found no evidence of bats but did identify features of the church that have potential for crevice roosting bats. Accordingly, additional dusk emergence/activity surveys were undertaken in August 2023. No evidence of bat activity was identified during the surveys and therefore it is concluded the existing church is not currently a bat roost.
- 4.5.2 The survey of the building concluded that it is unsuitable for hibernating bats.
- 4.5.3 The survey also considered breeding birds and no evidence was found to indicate active or inactive bird nests at the site.
- 4.5.4 To achieve a positive outcome for biodiversity, it is recommended to install 3no. swift boxes on the new hotel building.
- 4.5.5 Full details are provided within the supporting PRA Report.
- 4.5.6 As a result of the assessment and proposed mitigation, the proposal does not conflict with LDP Policy ENV7, as it will not adversely affect any protected or priority species. Furthermore, the development demonstrates compliance with biodiversity policies of PPW11, the Environmental (Wales) Act 2016, and Section 6 Duty, by providing biodiversity enhancement in the form of bird boxes proposed to be installed on the building.

## 4.6 Trees

- 4.6.1 A tree report prepared by ArbTS supports the planning application. Off site, there are 2no. Cherry tree specimens adjacent to the site which are in poor condition (indeed, one is unsuitable for retention), which are proposed to be replaced.

## 4.7 Green Infrastructure Statement

- 4.7.1 'Green infrastructure' is a term used to describe the network of natural spaces and corridors in a given area. As outlined in the preceding sections the use of the stepwise approach in demonstrating green infrastructure enhancement is made explicit in PPW Chapter 6.
- 4.7.2 The first priority is to avoid damage to biodiversity in its widest sense. As outlined above, the site is entirely brownfield land and is not a statutory designated site. The baseline position is one where there



is no natural space provided on site. In respect of corridors i.e. bird and bat corridors, the site is not a bat corridor and, as also outlined above, the PRA found no evidence of roosting bats.

- 4.7.3 The development will not give rise to any undue harm in respect of green infrastructure considerations. Off site, there are two specimen trees not considered suitable for retention.
- 4.7.4 Notwithstanding this, effective mitigation or restoration measures should be incorporated into the design proposal. Mitigation or restoration measures must be designed to address the specific negative effects by repairing damaged habitats and disturbed species.
- 4.7.5 As outlined above, to achieve a positive outcome for biodiversity, it is proposed to install 3no. swift nesting boxes on the proposed new hotel building. Off site replacement tree specimens of greater quality are proposed to replace existing poor specimens. Moreover, a green roof is proposed to be installed which is useful at this urban site with no space for landscaping at ground level. The roof creates habitat for flora and fauna and will contribute to enhancing on-site biodiversity.
- 4.7.6 When taken together the GI proposals will lead to a net betterment for biodiversity and ecosystem resilience from the site's baseline state (proportionate to the scale and nature of the development proposed). In this respect the proposed development accords with the GI Placemaking Principles outlined in PPW.

#### **4.8 Flood risk/Drainage**

- 4.8.1 Policy MD7 relates to environmental protection. In respect of flood risk, as outlined in the preceding section the site is located within Flood Zone A on the Welsh Government Development Advice Map – an area considered to be at little or no risk of fluvial or tidal flooding, with a less than 0.1% (1 in 1000) annual probability of flooding.
- 4.8.2 Policy EN10 requires water sensitive developments to employ SUDs. In respect of drainage, the application is subject to a separate SAB surface water drainage application. The proposed means of site drainage is outlined on the accompanying Proposed Drainage Strategy Plan prepared by Vale Consultancy. The strategy principally details the proposed installation of a 'green' or Sedum roof providing surface water attenuation.
- 4.8.3 In respect of policies MD7 and EN10, through careful design and mitigation the proposals demonstrate no unacceptable flood risk or drainage impacts. Further details are provided in the accompanying Proposed Drainage Strategy Plan.



## 4.9 Waste Management

- 4.9.1 A Waste Management Plan is not a planning application validation requirement and can be secured by an appropriately worded planning condition. Consideration has however, been given to waste and recycling in the design of the scheme.
- 4.9.2 On site waste storage facilities are provided on site in full accordance with the Council’s adopted supplementary guidance. An external, ventilated bin store, with direct access onto Rhymney Street is provide, with space provided above for the separation and storage of recycling.
- 4.9.3 A commercial waste management provider is anticipated at the operational phase of the development and this arrangement would be managed by Site Operations. The frequency of collections can be varied as necessary, depending on the occupancy levels at any given time.
- 4.9.4 As outlined above a full Waste and Recycling Management Strategy can be secured by planning condition. The information provided above demonstrates the proposal will comply with LDP Policies KP12 and W2.

## 4.10 Economic Benefits

- 4.10.1 PPW states in respect to the delivery of sustainable development economic considerations include:
- The numbers and types of jobs expected to be created or retained on the site;
  - Whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment; and
  - A consideration of the contribution to wider spatial strategies, for example for the growth or regeneration of certain areas.
- 4.10.2 With regard to economic benefits, the proposed redevelopment will create numerous full time equivalent jobs providing employment opportunity to the surrounding residential area, accessible on foot / cycle. Inward investment will likewise benefit existing surrounding businesses. The proposals will create indirect job opportunities associated with the supply chain serving the apart/hotel, such as catering, servicing etc. The wider economic benefits of the proposed development are self-evident.



## 5.0 Summary and Conclusions

5.1.1 This Planning Statement has been prepared by CarneySweeney in support of a full planning application for the demolition of the former Welsh Evangelical Church, and development of a 17no. bed Aparthotel (Class C1/Sui generis) with Food and Drink (Class A3) and Community Space (Class D1) and all associated development at Harriet Street, Cathays, Cardiff.

5.1.2 In light of the above considerations, we make the following conclusions:

- The site falls within the settlement boundary and has no policy designation.
- The development will bring a vacant site back into beneficial use. The multi-use development will deliver a modern, multi-purpose community space; this offsets the loss of the former church building which is surplus to requirements.
- The principle of the proposal is considered acceptable. The scale and form of the proposal safeguards neighbouring residential amenity.
- The site is highly accessible, sitting directly between two district centres and well served by local amenities. Parking surveys find there is sufficient parking opportunity in the surrounding area to mitigate the proposed loss of off-street parking which will facilitate public realm improvements.
- Ecological surveys find the site is not used for bat and bird roosting. Ecological mitigation is proposed as part of the redevelopment to deliver biodiversity benefit.
- A Drainage Strategy Plan demonstrates the incorporation of sustainable drainage design. This will be subject to separate SAB approval.

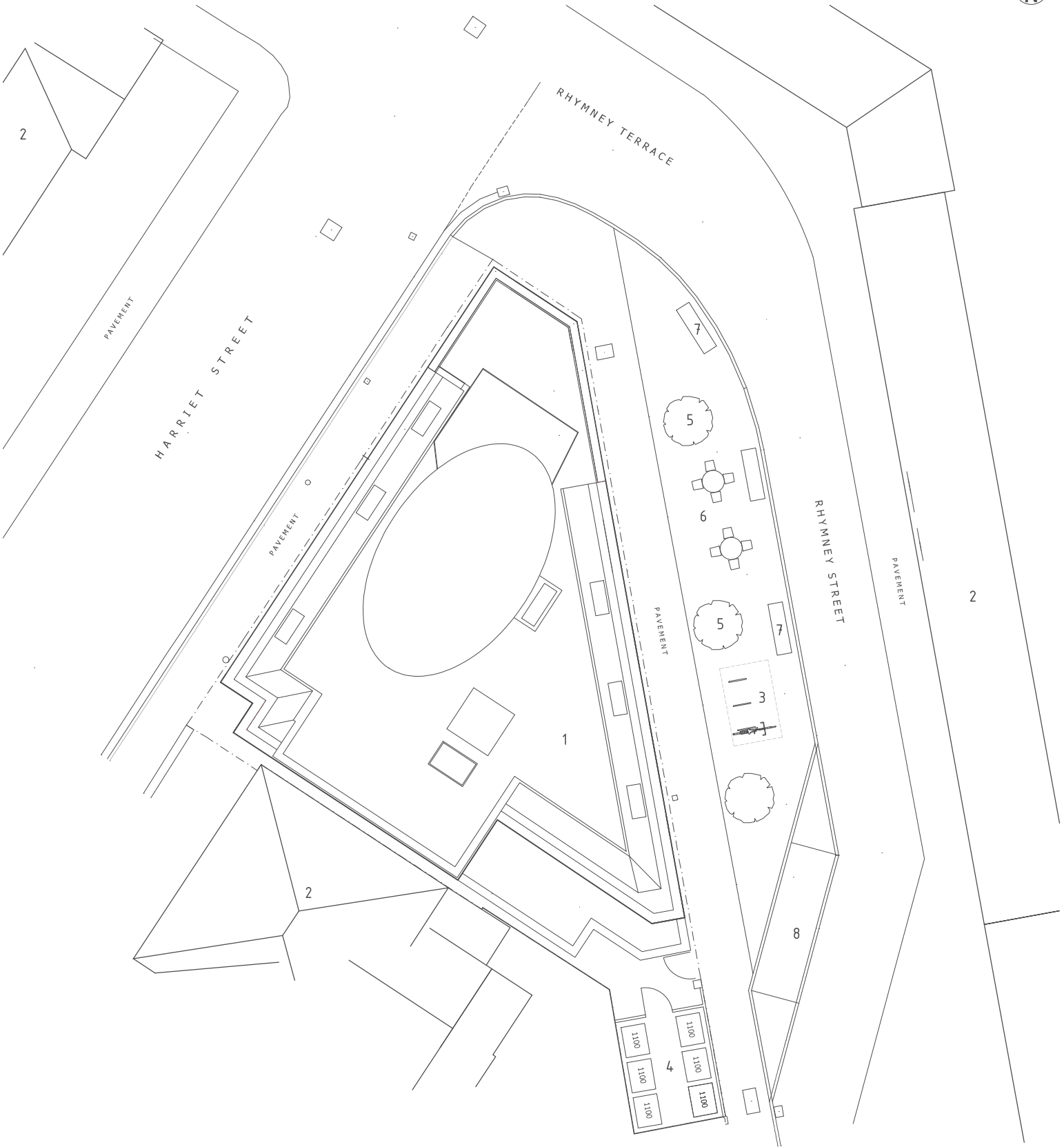
5.1.3 The applicant is committed to delivering a high quality, sustainably located and designed development which will deliver economic investment to Cardiff. The application proposal has been assessed against the relevant national and local planning policy framework, particular Future Wales and the Cardiff LDP. In light of the above considerations, it has been demonstrated the redevelopment proposals can comply with all policy requirements, subject to appropriate planning conditions.

5.1.4 The overall balance of considerations which weigh firmly in favour of approving the proposed redevelopment.



# Appendix A – Site Layout Plan





**LEGEND**

- 1. PROPOSED MIXED USE BUILDING
- 2. EXISTING BUILDING
- 3. 6 No CYCLES SPACES
- 4. COVERED REFUSE STORE
- 5. TREE (type TBA)
- 6. EXTERNAL SEATING AREA
- 7. MOVEABLE PLANTER
- 8. LOADING BAY / DELIVERIES

**PROPOSED SITE PLAN**