

PROJECT | 47-48 ST MARY STREET, CARDIFF CF10 1AT
PLANNING SUPPORTING STATEMENT



March 2021

Table of Contents

Title	Page
Introduction	3
Appraisal	4
Local Development Plan	5
Planning Policy Wales	6
Conclusion	10

1. Introduction

PROJECT | 47-48 ST MARY STREET, CARDIFF CF10 1AT
PLANNING SUPPORTING STATEMENT

This planning supporting statement forms part of a full planning application submission on behalf of Pittsburgh Holdings Limited for the refurbishment/extension to existing commercial premise and conversion of office space (Class B1) to create 10 residential apartments (Class C3) and associated engineering works. The application is being submitted following a statutory pre-application submission reference no. PA/17/00082/MJR submitted 14 June 2017.

The property is located on St Mary Street, Cardiff City Centre. The premises consists of a partial lower ground floor accessed from the existing commercial space of 47-48 St Mary Street, this commercial space occupies the ground floor with the last use of the space by a business retailing rugby and other sports clothing and merchandise. The shop falls within Use Class A1. A separate door located on the street frontage provides access to offices (Class B1) located on the first, second and third floors.

The property has been unoccupied and vacant for a number of years, marketed by Lambert Smith Hampton and EJ Hales since 2012. The extensive period of marketing has demonstrated limited interest and demand for office space of this nature within the city centre location.

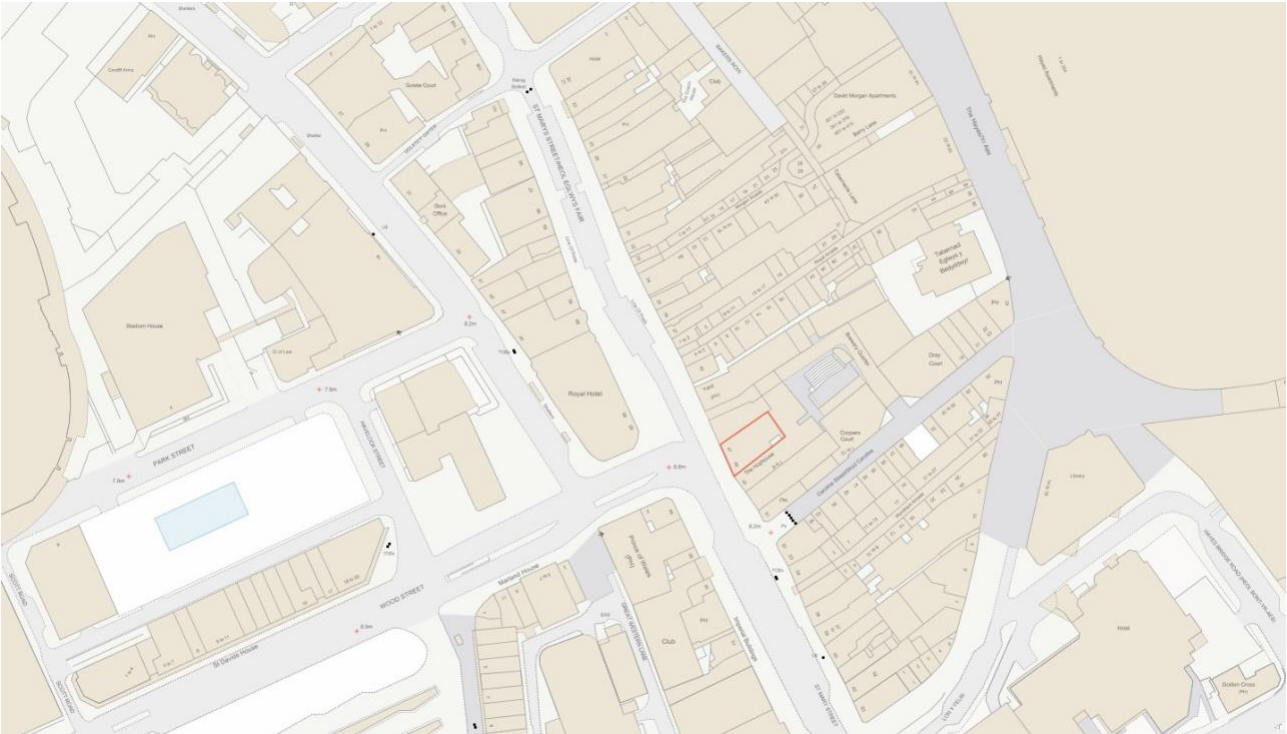


Satellite image indicating the site boundaries



Satellite image indicating the site boundaries

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PLANNING SUPPORTING STATEMENT



Location plan indicating site boundaries



Location plan indicating site boundaries

2. Appraisal

The existing retail commercial space of 47-48 St Mary Street occupies the ground floor and lower ground floor areas. The lower ground floor provides storage space whilst the ground floor area consists of an open retail area with numerous smaller rooms providing toilet facilities, storage and office space over a change in levels of approx. 750mm. An additional staircase leading to a first floor small store area and toilet facility also serve the retail space. Externally there are two enclosed yard areas creating lightwells into the space. External yard 01 (indicated on drawing 21.214.01) is

totally enclosed by high walls surrounding the premise whilst external yard 02 provides and external staircase as means of escape from the office space above.

An entrance doorway leading off the street frontage provides access to the office space on the first, second and third floor. The office space over all three floors is served by a principal internal staircase. There is an external staircase providing means of escape from office areas on each floor.

The proposal allows for the separation of the ground floor retail space and introduction of a protected stairwell serving the conversion of the office space providing access to the lower ground floor for residential cycle and bin storage. A passenger lift will also provide access to the lower ground floor, first, second and third floor residential areas only. An additional staircase will be created within the retail area providing access to the lower ground floor. Demolition of existing buildings to the rear yard areas will allow the extension of the retail space providing a greater open plan arrangement. This extension will also accommodate residential provisions to the first, second and third floor. The existing office space shall be converted to provide a mix of 6x1 bedroom apartments 4x studio apartments. The conversion of office space will provide 10 residential apartments within a city centre location. The apartments will satisfy the authorities supplementary planning guidance for flat conversions introduced in March 2019.

3. Local Development Plan

Cardiff Council Local Development Plan (LDP) adopted in January 2016. Relevant planning policy applicable to the application

H2: CONVERSION TO RESIDENTIAL USE

Within the Central Business Area of the city centre, District and Local centres, as defined on the Proposals Map, the conversion of suitable vacant space above commercial premises to residential use will be favoured where:

- i. **Adequate servicing and security can be maintained to the existing commercial use(s);**
- ii. **Appropriate provision can be made for parking, access, pedestrian access, amenity space, and refuse disposal together with any appropriate external alterations and;**
- iii. **The residential use does not compromise the ground floor use.**

H3: AFFORDABLE HOUSING

The Council will seek 20% affordable housing on Brownfield sites and 30% affordable housing on Greenfield sites in all residential proposals that:

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

Affordable housing will be sought to be delivered on-site in all instances unless there are exceptional circumstances.

EC4: PROTECTING OFFICES IN THE CENTRAL AND BAY BUSINESS AREAS

The alternative use of offices within the Central and Bay Business Areas will only be permitted where it can be demonstrated that there is no need to retain the site or premises for office use having regard to the demand for offices and the requirement to provide a range and choice of sites available for such use.

T5: MANAGING TRANSPORT IMPACTS

Where necessary, safe and convenient provision will be sought in conjunction with development for:

- i. **Pedestrians, including people with prams and/or young children;**
- ii. **Disabled people with mobility impairments and particular access needs;**
- iii. **Cyclists;**
- iv. **Powered two-wheelers;**
- v. **Public transport;**
- vi. **Vehicular access and traffic management within the site and its vicinity;**
- vii. **Car parking and servicing;**
- viii. **Coach parking; and**
- ix. **Horse-riders.**

EN13: AIR, NOISE, LIGHT POLLUTION AND LAND CONTAMINATION

Development will not be permitted where it would cause or result in unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of nature conservation, landscape or built heritage importance because of air, noise, light pollution or the presence of unacceptable levels of land contamination.

Extract from Local Development Plan Policy EN13

"5.181 Noise can have a harmful impact on people's health and quality of life. Developments such as housing, schools and hospitals can be particularly sensitive to noise, as can areas of landscape, nature or built heritage importance. Where possible, new developments that are particularly noise-sensitive should be located away from existing or proposed sources of significant noise. This assessment can be informed by information on noise complaints being collated by the Council as part of an on-going initiative to reduce noise nuisance. "

"5.182 Major transport routes (road, rail and air) and some industrial and commercial activities can generate particularly high noise levels. There is specific guidance within TAN 11 that specifies Noise Exposure Categories that assists with proposed residential development near transport related noise."

"5.183 In addition to this, Welsh Government as part of its statutory duties under the Environmental Noise Directive has designated areas within Cardiff Noise Action Planning Priority Action Areas. The aim of the Directive is to define a common approach intended to avoid, prevent, or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise. The Directive defines environmental noise as unwanted or harmful outdoor sound created by human activities, including noise emitted by means of transport, road traffic, rail traffic, air traffic, and from sites of industrial activity."

“5.192 Necessary new development that would give rise to high noise levels, including proposed transport schemes, should be located and designed so as to minimise their noise impact. Where noise-sensitive development needs to be located close to transport infrastructure for access reasons, it should be designed to reduce noise impact. Where necessary, developers will be required to provide an assessment of noise impact, together with proposals for mitigation.”

To comply with the above, it is proposed:

- to minimise the potential impact of noise between the ground floor commercial units, a scheme of sound insulation works to the floor/ceiling and party wall structure between residential and commercial units will be submitted to and agreed by the Local Planning Authority in writing and implemented prior to occupation.
- the external facades will be designed to minimise the potential noise impact of noise from the external commercial noise sources and road traffic particularly in those in The Brewery Quarter, again be submitted to and agreed by the Local Planning Authority in writing and implemented prior to occupation.

4. Planning Policy Wales Technical Advice Note



Objectives of good design

Access and inclusivity

- Good design is inclusive design. Development proposals should place people at the heart of the design process, acknowledge diversity and difference, offer choice where a single design solution cannot accommodate all users, provide for flexibility in use and provide buildings and environments that are convenient and enjoyable to use for everyone.
- 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. Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport.

Environmental Sustainability

- Good design promotes environmental sustainability and contributes to the achievement of the well-being goals. Developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution. An integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment will be an appropriate way of contributing to resilient development.
- Good design can help to ensure high environmental quality. Landscape and green infrastructure considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places. This embraces the principles of 'ecosystems services' and sustainable management of natural resources where multiple benefits solution become an integral part of good design. In a similar manner, addressing environmental risks can make a positive contribution to environmental protection and improvement, addressing land contamination, instability and flood risk and providing for biodiversity, climate protection, improved air quality, soundscape and water resources benefits.

Character

- 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.
- In areas recognised for their particular landscape, townscape, cultural or historic character and value it can be appropriate to seek to promote or reinforce local distinctiveness. In those areas, the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important.

Community Safety

- Local authorities are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities well-being goal.

Movement

- Good design is about avoiding the creation of car-based developments. It contributes to minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate.
- Existing infrastructure must be utilised and maximised, wherever possible. Where new infrastructure is necessary to mitigate transport impacts of a development and to maximise

accessibility by sustainable non-car modes, it should be integrated within the development layout and beyond the boundary, as appropriate. This could include works to connect cycle routes within a site to a wider strategic cycling network or provision of bus priority measures on highway corridors serving a new development.

Appraising Context

- Site and context analysis should be used to determine the appropriateness of a development proposal in responding to its surroundings. This process will ensure that a development is well integrated into the fabric of the existing built environment. The analysis process will highlight constraints and opportunities presented by existing settlement structure and uses, landscape, biodiversity, water environment, movement, infrastructure, materials and resources, soundscape and built form which will need to be considered when formulating proposals.

Considering Design Issues

- Development plans should include policies and guidance that promote good design in the built environment and be sufficiently robust to refuse poor quality development proposals. Planning authorities should consider strategic design issues (such as site location, context and connectivity) when making development plan allocations and reference these in the plan. A variety of tools (such as development briefs, design frameworks and supplementary planning guidance, including Place Plans) can be used to outline specific sustainable design requirements where applicable to a particular local issue or specific sites. These can also help to identify and coordinate opportunities to revitalise towns and other urban areas and to guide development generally. The Design Review service offered by the Design Commission for Wales can provide independent advice and feedback on individual schemes and framework documents.
- Planning authorities should through a process of negotiation seek to improve poor or average developments which are not well designed, do not take account of their context and consider their place, or do not meet the objectives of good design. Where this cannot be achieved proposals should be rejected. However, they should not attempt to impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions. If a decision maker considers that a planning application should not be approved because of design concerns they should ensure that these reasons are clearly articulated in their decision and justified with sufficient evidence. In the event of an appeal, in these circumstances, the Planning Inspectorate will need to examine the issues in detail and consider if the proposal meets the objectives of good design including the relationship between the site and its surroundings.

Design and Access Statements

- A Design and Access Statement communicates what development is proposed, demonstrates the design process that has been undertaken and explains how the objectives of good design and placemaking have been considered from the outset of the development process. In preparing design and access statements, applicants should take an integrated and inclusive approach to sustainable design, proportionate to the scale and type of development proposal. They should be 'living' documents dealing with all relevant aspects of design throughout the process and the life of the development, clearly stating the design principles and concepts adopted and include illustrative material in diagrams, plans, elevations and sections where relevant.
- Where Design and Access Statements are not required, design and placemaking must still be taken into account when preparing and assessing development proposals.

5. Conclusion

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PLANNING SUPPORTING STATEMENT

The principle of the proposal, in land use policy terms, accords with national and local policy guidance in broad terms.

The proposed development has sought to provide a design that integrates into the existing vernacular whilst also enhancing the built environment. In this respect, matters of scale, form, layout and materials finishes are in accordance with local character.

The proposed development is located in a sustainable location within the city centre.

It is considered that the scheme represents a suitable and well-considered form of development that represents an opportunity for Pittsburgh Holdings Limited to develop a long-term vacant property bringing much needed affordable homes to a city centre location and also providing appropriate retail/commercial space.