Planning Statement

Land at John Street, Cardiff

June 2025

Turley

Contents

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Client
Grainger Residential Limited

Our reference
GRAT3002

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1. Introduction

1.1 This Planning Statement has been prepared by Turley on behalf of Grainger Residential Limited ('the Applicant') in support of a full planning application for a proposed Build to Rent (BtR) residential development at John Street, Cardiff.

1.2 The formal description of development ('Proposed Development') is as follows:

"Redevelopment to provide residential apartments (Class C3), internal and external amenity spaces, cycle parking, ancillary commercial / retail space (Class A1/A2/A3/B1/D1/D2); refurbishment and external alterations to existing railway arches to enable their beneficial reuse for commercial / retail space (Class A1/A2/A3/B1/D1/D2), cycle parking and internal amenity space; and associated landscaping, public realm and ancillary infrastructure and engineering works."

1.3 The proposal will provide 417 new homes for rental, together with high quality internal and external shared amenity spaces, ground floor commercial space and cycle storage. The scheme also proposes the refurbishment and reuse of five existing railway arches to provide further commercial space and amenity / cycle parking for residents.

Grainger Residential Development

1.4 Grainger is a leading provider and operator of BtR homes in the UK, with a strong track record of delivering high-quality, professionally managed rental communities. Grainger supports BtR developments by designing homes specifically for long-term rental, offering on-site management, a range of resident amenities, and community-building initiatives that enhance tenant experience.

1.5 Their schemes typically include features such as flexible tenancy options, responsive maintenance services and shared spaces to promote social interaction, helping to meet growing demand for high-quality, secure rental housing.

Structure of this Planning Statement

1.6 This Statement is structured in the following order. It should be read in conjunction with the other documents / plans submitted in support of the planning application:

- Section 2 – Site and Surrounding Context
- Section 3 – Planning History
- Section 4 – The Proposed Development
- Section 5 – Pre-Application Engagement
- Section 6 – Planning Policy Context
- Section 7 – Planning Assessment
- Section 8 – Draft Heads of Terms
- Section 9 – Summary and Conclusions

2. Site and Surrounding Context

Site Description

2.1 The site comprises approximately 0.49 hectares of brownfield land, located at the northeastern corner of Callaghan Square, c. 500 metres southeast of Cardiff City Centre.

2.2 Formerly used for industrial purposes, the site more recently operated as a car park and a performance venue for the 'No Fit State Circus.' The site has since been cleared and comprises areas of tarmac, with the remainder of the site made up of stone / gravel substrate with short vegetation cover. The site is currently vacant, with the exception of temporary buildings associated with site security and the construction of a new office building to the south of John Street.

2.3 The site is bordered to the north by an elevated railway line, beneath which are a series of railway arches. Five of the railway arches, which are currently vacant, form part of the application site. The arches are standalone units enclosed by frontages constructed of brick / metal.

2.4 A line of mature trees, located outside of the site boundary, separates the site from a further railway line to the east. Bute Street forms the western boundary. Immediately to the south, separated by John Street, is a newly completed 10 storey office development.

2.5 The surrounding area is characterised by modern high rise commercial and residential buildings and has been the subject of significant redevelopment in recent years. Alongside the new office development to the south, there is a cluster of tall buildings to the north of the railway line, which includes the Radisson Blu Hotel, Meridian Plaza and Altolusso.

2.6 To the east, lies ‘Capital Quarter’ an area that has redeveloped over recent years to accommodate new office floorspace and residential uses. This includes ‘The Copper Works’, a BtR development also owned by the Applicant and ‘Zenith Student Accommodation’, a 25 storey student housing scheme located to the south east of the site.

2.7 To the west, across Bute Street, lies Callaghan Square, a key business and commercial hub within the city centre.

Planning and Environmental Designations

2.8 The site forms part of a wider strategic allocation (‘Strategic Site A: Cardiff Central Enterprise Zone and Regional Transport Hub’) in the adopted Cardiff Local Development Plan (‘LDP’). The allocation proposes major employment-led development with other mixed uses, including residential.

2.9 The site also lies within the defined ‘Central Business Area’ (Policy KP10), which confirms that residential uses are appropriate within this area.

2.10 The NRW ‘Flood Map for Planning’ indicates that the site is located entirely within fluvial Flood Zone 2, indicating a medium probability of flooding from rivers. The site is also within a TAN15 Defended Zone and benefits from defences with a Standard of Protection of 200 years against fluvial flooding.

2.11 There are no known ecological or landscape designations on the site.

2.12 The site is not located within a defined Conservation Area and there are no heritage assets located within the site. There are several listed buildings within close proximity, including:

- Grade II listed Statue of Second Marquees of Bute c. 100mto the south west;
- Grade II listed Railway Bridge over Dock Feeder c. 40m to the east; and
- Grade II listed Golden Cross Public House to c. 80m the north west.

Site Accessibility

2.13 The site benefits from direct vehicular access via John Street and occupies a highly accessible location, well connected to the city's transport infrastructure. It fronts Bute Street, a key north south arterial route linking Cardiff Bay with the city centre.

2.14 Several public bus stops are located in close proximity, including one immediately adjacent to the site on Bute Street. Cardiff Central and Queen Street railway stations are both within walking distance, situated approximately 400 metres to the west and 650 metres to the northeast, respectively.

3. Planning History

3.1 The site, together with a parcel of land south of John Street, formed part of a wider hybrid planning application for a mixed-use development (ref: 17/02615/MJR). Planning permission was granted in April 2018.

3.2 The outline component of the hybrid permission relates specifically to the application site. It proposed a 27 storey mixed-use building, comprising ground floor commercial space, office accommodation (on the lower 10 storeys) and a hotel (on levels 11 to 27).

3.3 The full element of the planning permission proposed a 10 storey office development, with two ground floor retail units. The office building has now been built out and is currently being fitted out ahead of occupation.

3.4 A Section 73 application to vary the hybrid planning permission (ref: 19/01065/MJR) was approved in December 2020. The approved amendments included changes to the structural grid, alterations to material finishes, replacement of the multi-storey car park (MSCP) with a rear surface car park and parking along the Network Rail access road, relocation of the sprinkler tank, additional office space at first floor level, and additional gym space and cycle storage at ground floor.

3.5 Several conditions attached to the varied planning permission were discharged under application ref: 20/00442/MJR, also in December 2020. The conditions related to material samples, architectural details and waste storage provision for the detailed element of the scheme, as well as cycle provision details applicable to both the full and outline elements.

3.6 A further Section 73 application (ref: 23/02922/VAR) was submitted in December 2023, which seeks to extend the time period for submission of reserved matters relating to the outline element of the varied scheme. This application is currently pending determination.

3.7 A non-material amendment (NMA) (ref. 25/00046/NMA) was submitted in January 2025 to planning permission 19/01065/MJR, which sought several minor amendments to enable the prospective tenant (Lloyds Banking Group) to safely occupy and fully utilise the space efficiently. This application is also currently pending determination.

3.8 Other applications relating to the site include a prior approval application (ref: 15/03112/MJR) for the demolition of the 'No Fit State' Circus building (The Princess of Wales Building), which was granted in January 2016.

3.9 Full planning permission was also granted in March 2021 for the change of use of six railway arches to Class A1, A2, A3, B1, B2 and D1 uses. The premises previously operated as studios (Class D2).

4. Pre-Application Engagement

4.1 Grainger has engaged in comprehensive pre-application discussions with stakeholders from an early stage in the planning process. This began with informal discussions with local planning authority officers, prior to three formal pre-application meetings. Through this process the proposal has been progressively refined in response to detailed feedback from planning officers.

4.2 In parallel with the formal planning pre-application process, efforts were made to engage with a broad range of stakeholders. This helped to ensure a comprehensive understanding of future aspirations for the area and how the proposed scheme could best align with and support these wider plans.

4.3 An overview of the key meetings and milestones throughout the design development process is provided below. Further detail of pre-application engagement is provided in the Design and Access Statement and other technical reports.

Informal Meeting with Cardiff Council – 9th November 2023

4.4 The scheme was introduced to officers and initial design principles were presented. The overall proposal, including its scale, massing, and height, was positively received, as was the approach to tenure. There was a productive discussion around activating the railway arches and incorporating commercial uses at ground floor level. The BtR element also received strong support, with officers noting a clear appetite for additional BtR provision within the city centre.

Informal Meeting with Cardiff Council – 16th September 2024

4.5 A further informal meeting took place in September 2024, during which the design team re-presented the scheme. The proposals continued to be well received. Discussions focused on anticipated timescales, the pre-application process, and clarification of the scheme's full extent, including confirmation that five of the existing railway arches formed part of the development.

Pre-Application Meeting 1 with Cardiff Council – 1st November 2024

4.6 The proposal's overall scale, massing, height and tenure mix were positively received by officers. Discussions focused on the proposed amenity provision, including the balance between internal and external spaces. The potential inclusion of balconies was reviewed, with the Council expressing a preference for balconies on larger units to ensure a 'residential character'. Consideration was also given to the ground floor treatment, with officers favouring the use of brickwork for materiality and architectural expression. In addition, the quantum and location of cycle parking were discussed.

Pre-Application Meeting 2 with Cardiff Council – 20th January 2025

4.7 The proposed massing was considered appropriate in both scale and location. Officers emphasised the importance of carefully detailing the vertical proportions of the building, in addition to the ground floor, to ensure strong articulation and a positive contribution to townscape views. The ongoing exploration of materials was well received, with encouragement to draw further reference from Cardiff's industrial heritage. Balcony provision and the need for wind testing were raised, along with the relationship between internal and external amenity spaces. The design team's testing

of various architectural concepts and materials was noted positively. Clarification was sought regarding the zoning of the central courtyard, potential congestion along the southern route adjacent to the arches, and details of the proposed means of separating the public and private spaces. The inclusion of trees within the scheme was welcomed.

Pre-Application Meeting 3 with Cardiff Council – 17th March 2025

4.8 In this final pre-application meeting, Officers expressed support for the landscape design and associated details, with agreement that further information would be provided regarding the level changes near arches / Bute Street. The proposed location of cycle parking was discussed further, and the importance of providing amenity spaces that support social interaction and relaxation was emphasised.

4.9 The relationship between the scheme and the adjacent office building was discussed, with material presented by the design team to demonstrate that the offset between the two uses would be appropriate. The design team confirmed that the proposal would not include balconies. Officers noted that the key driver behind the request for balconies was to maintain a strong residential character. The design team noted that the architectural response will ensure that a residential quality is embedded throughout the scheme. Additional matters discussed included early engagement with Welsh Water and ongoing dialogue with Highways. It was agreed that the design team would continue to develop the detailed façade design.

Further Consultation

4.10 In parallel to pre-application meetings with planning officers, a series of meetings were held with other stakeholders to ensure a coordinated development and address technical requirements across relevant agencies. These included:

- Initial meeting with South Wales Fire and Rescue Services and Building Control (31st October 2024)
- SAB Meeting (14th November 2024)
- Network Rail (24th January 2024)
- Second meeting with South Wales Fire and Rescue Services and Building Control (20th January 2025)
- Meeting with Welsh Government and Cardiff Council to discuss drainage connection proposals in the context of the Metro scheme (18th February 2025)
- Follow up meeting to the above (19th February 2025)
- Meeting with Cardiff Council and Crossrail (4th March 2025)
- Metro Team Drainage Co-ordination Consultation (5th March 2025)
- Initial meeting with Network Rail Asset Protection (10th April 2025)
- Meeting with Network Rail Property and Planning Departments (12th May 2025)
- Meeting with Transport for Wales Meeting (13th May 2025)
- Formal SAB Pre-Application Consultation (19th May 2025)
- Meeting with South Wales Police regarding Secure By Design (4th June 2025)

5. The Proposed Development

5.1 As identified within Section 1 of this Statement, this full planning application proposes the following development:

"Redevelopment to provide residential apartments (Class C3), internal and external amenity spaces, cycle parking, ancillary commercial / retail space (Class A1/A2/A3/B1/D1/D2); refurbishment and external alterations to existing railway arches to enable their beneficial reuse for commercial / retail space (Class A1/A2/A3/B1/D1/D2), cycle parking and internal amenity space; and associated landscaping, public realm and ancillary infrastructure and engineering works."

5.2 The proposed development seeks to provide a high quality BtR development, which will be owned, developed and operated by Grainger. The apartments will not be available to purchase individually.

5.3 Further details of the proposals are provided within the plans submitted in support of the application, together with the Design and Access Statement and Landscape and Green Infrastructure Statement.

Proposed Uses

5.4 The proposal will provide 417 apartments, comprised as follows:

Bedrooms	Number of Units	Average Floor Area
Studio	89	36 sq m
1 bed	171	47sq m
2 bedroom	140	67 sq m
3 bedroom	17	82 sq m
Total	**417**	

Table 5.1: Schedule of Accommodation

5.5 The scheme also provides a range of ancillary communal facilities, including internal and external amenity space. This provision is described in more detail below.

5.6 The proposal will include three commercial spaces, one within the ground floor of the main building, and two within the refurbished railway arches. A total of 147 sq m of commercial space will be provided. Given the occupiers of the commercial uses are currently unknown, a flexible range of use classes is sought (Classes A1, A2, A3, B1, D1, D2).

Layout

5.7 The proposal comprises two primary tower elements, linked by a central connecting block. 'Tower A' rises to 28 storeys, while the central 'Link Block' spans 6 storeys. 'Tower B', positioned to the east, comprises 18 storeys. The overall footprint has been shaped in response to the site's surrounding boundary conditions.

5.8 The scheme includes the refurbishment and reuse of five existing, currently vacant, railway arches located along the northern edge of the site. The two westernmost arches are proposed to accommodate commercial uses (totalling 113 sq m). The two easternmost arches will provide cycle parking for residents, whilst the central arch is designated for residential amenity space.

5.9 The main double height entrance resident foyer will be located on the ground floor of Tower A facing Bute Street. This will be the principal means of access for residents.

5.10 The ground floor of the main building (Tower A) will accommodate an additional commercial unit (147 sq m) positioned opposite the arches to create an active public hub. The ground floor will also provide resident amenity space, which is expected to comprise a gym, a co-working space with bookable meeting rooms, and a wellbeing suite with lounge areas. A staff office and post room will also be provide on the ground floor of Tower A.

5.11 The ground floor will also accommodate back of house facilities and plant associated with the development. Two bin stores will be provided, split between Tower A and B. A further refuse store (for bulky items) will be provided at the first floor of Tower A.

5.12 Cycle parking for residents will also be provided at ground floor level in Tower B. Further cycle parking will be provided in an external shelter (adjacent to the northern elevation) and within two of the refurbished railway arches.

5.13 The upper floors of the scheme are dedicated to residential use where a mixture of studio, 1, 2 and 3 bed apartments are provided, interspersed with amenity areas at Level 06 and Level 27.

5.14 A landscaped podium terrace garden is incorporated on Level 06 designed for dining events and community activities. Accessible from the cores of both towers, this outdoor space offers panoramic views across Cardiff Bay and the city centre.

5.15 An external landscaped courtyard wraps around the building footprint at ground floor level, offering further amenity space with spaces for play, relaxation and informal gathering. The courtyard will provide private amenity space for residents, with appropriate boundary treatment erected to the south west and north east of the space. The scheme also proposes new public realm / amenity space fronting Bute Street, which will be accessible to both residents and the general public.

Scale, Form and Appearance

5.16 The western tower (Tower A) base elevation incorporates a generous double height glazed elevation offering an animated active frontage with brick detailing. The brick

detailing includes a contrasting dark, glazed brick framing the entrance, with multiple setbacks and hit and miss coursing between the windows above the ground floor.

5.17 A light brickwork treatment is used throughout the mid-sections of both Tower A and Tower B, complemented by aluminium framed windows, perforated metal panels and vertical fin detailing adjacent to the glazing. Towards the upper levels of the towers, dark brickwork is reintroduced to create visual contrast and define the building tops. The Link Block will primarily feature dark brickwork, punctuated by aluminium framed glazed windows.

Amenity

5.18 The scheme provides a well-balanced and thoughtfully distributed mix of amenity spaces, supporting live, work and wellbeing needs throughout the development. In total, 3,640 sq m of high quality internal and external amenity space is proposed. This includes 3,089 sq m of amenity provision at ground floor level, including one of the repurposed railway arches, a central courtyard and a range of communal facilities.

5.19 At Level 06, residents will benefit from a further 494 sq m of indoor and external amenity space. This includes a 50 sq m internal amenity space, which is expected to be used for private dining, events and community events. A landscaped podium terrace will also be provided, which will provide external space for residents and complements the internal amenity space.

5.20 A further 57 sq m of internal amenity space is provided at Level 27, offering panoramic views across the city. This space, which is the equivalent of a 2 bedroom apartment, is expected to be used as a games room providing a space for residents to socialise and relax.

5.21 Complementing the private residential amenities, the scheme also delivers 1,497 sq m of high-quality public realm and 1,579 sq m of private landscaped areas. This provision is set out in more detail in the submitted Landscape and Green Infrastructure Statement.

Access and Cyle Parking

5.22 Vehicular access to the site will be from the south off Bute St via John Street. The proposals include the creation of a new lay-by to the south of the link building off John Street. This will accommodate refuse vehicles, as well as taxis, deliveries and general drop-offs. No car parking will be provided as part of the proposal.

5.23 The layout has been designed to ensure emergency vehicle access. A fire tender will be able to reach within 45 metres of all parts of the building. Vehicles can either reverse into the northern section of the site from the turning head or circulate around the building via the perimeter route.

5.24 The proposed cycle storage for the development has been designed to accommodate 418 internal cycle spaces (using two-tier cycle stands with 375mm centres). The spaces will be provided at ground floor level of Tower B, within an external covered shelter and within two of the refurbished arches. The cycle spaces will be accessible from John

Street and from the internal courtyard. A further 39 external cycle spaces will be provided, comprising 24 external Sheffield stands integrated into the public realm design along John Street and 15 external ‘moveable rack’ spaces for visitors outside of the arches.

6. Planning Policy Context

The Development Plan

6.1 The development plan for the site comprises:

- Future Wales – The National Plan 2040 (Future Wales) (February 2021); and
- Cardiff Local Development Plan (LDP) (January 2016).

Future Wales

6.2 Future Wales is the national spatial strategy for Wales. It seeks to focus on solutions to issues and challenges at a national scale. The plan sets national objectives and promotes a broad spatial strategy to achieve them. It is ambitious in key sectors including housing and affordable housing growth, placemaking, well-being and quality of life, sustainability and renewable energy.

6.3 Future Wales places an emphasis on directing development to cities and large towns. It seeks to promote urban growth and regeneration focused within inner city areas and town centres, co-locating homes, jobs and services.

6.4 Policy 1 identifies three National Growth Areas, where there will be growth in employment and housing. Cardiff, Newport and the Valleys is identified as one of the three National Growth Areas.

6.5 Policy 2 'Shaping Urban Growth and Regeneration – Strategic Placemaking' aims to create compact and walkable urban neighbourhoods. A number of strategic placemaking principles for urban growth and regeneration are provided, which include the following:

- *"creating a rich mix of uses;*
- *providing a variety of housing types and tenures;*
- *building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*
- *increasing population density, with development built at urban densities that can support public transport and local facilities;*
- *establishing a permeable network of streets, with a hierarchy that informs the nature of development; …*
- *integrating green infrastructure …"*

6.6 In terms of the density of developments, Future Wales confirms that urban growth and regeneration should increase the population density of cities in order to support their economic and social success, including sustaining public transport and facilities. New

developments in urban areas should aim to have a density of at least 50 dwellings per hectare (net), with higher densities in more central and accessible locations.

6.7 Policy 33 confirms that Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region, including strategic economic and housing growth.

Cardiff Local Development Plan (LDP)

Policy KP1: Level of Growth

6.8 Policy KP1 confirms that the adopted LDP makes provision for 45,415 new dwellings and 40,000 new jobs in Cardiff between 2006 and 2026.

Policy KP2 (A): Cardiff Central Enterprise Zone and Regional Transport Hub

6.9 The site forms part of the wider Cardiff Central Enterprise Zone and Regional Transport Hub strategic allocation, as identified by Policy KP2 (A) of the LDP. The allocation extends to 78.8 ha of brownfield land within the heart of the city. Land allocated within this area is identified for major employment-led regeneration, together with other mixed uses, including residential.

6.10 Policy KP2 (A) sets out a number of 'key master planning requirements' that development within this area should accord with. This includes maximising densities to make efficient use of land. High rise, high density developments at appropriate locations within the area are encouraged. It states that residential densities in excess of 100 dwellings per hectare are not considered unreasonable in principle.

6.11 The policy advocates a range of uses across the Strategic Site, including mixed-use commercial, leisure, business and residential uses. This includes a range of employment provision, including 'Grade A' office accommodation, start-up businesses, creative workshops and incubator units.

6.12 The policy also supports the creation of 'destination spaces' with active uses which complement business. Support is also provided for the creation of natural green spaces and upgrading 'site gateways' and the public realm. The policy also seeks to enhance pedestrian / cycle access between north and south sides of the main railway line.

6.13 Policy KP2 (A) indicatively shows the infrastructure and masterplanning requirements on a 'Schematic Framework'. The Schematic Framework indicatively identifies the site for 'Business / Employment Uses'.

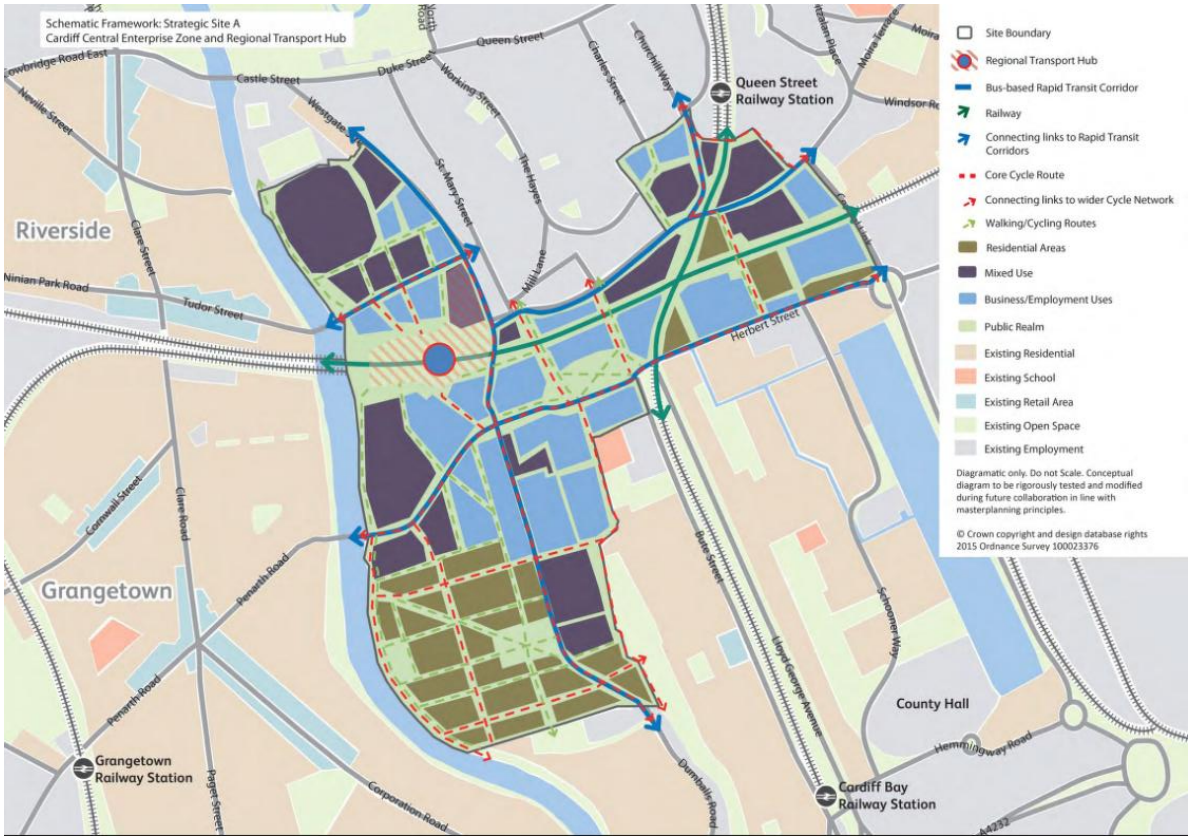

Figure 1.1 Policy KP2 (A) Schematic Framework (Source Cardiff LDP (2016))

Policy KP10: Central Bay and Business Area

6.14 The site lies within the 'Central and Bay Business Area' as identified by Policy KP10 of the LDP. The policy confirms that new offices, residential and commercial leisure uses are all considered appropriate within the designated area. The policy notes that other uses most appropriately located in city centres are also considered acceptable.

Policy H3: Affordable Housing

6.15 The policy seeks 20% affordable housing on brownfield sites that meet the identified criteria. It notes that affordable housing will be sought to be delivered on-site, unless there are exceptional circumstances. The supporting text (Paragraph 5.11) confirms that in negotiating affordable housing, each proposal's actual contribution will depend on that scheme's capacity for provision. This is to ensure that the affordable housing contribution in itself will not make a scheme unviable.

Other LDP Policies of Relevance

6.16 Beyond the above site / area specific policies, the following policies within the LDP are of also of relevance to the proposed development.

- Policy KP4: Masterplanning Approach
- Policy KP5: Good Quality and Sustainable Design
- Policy KP6: New Infrastructure
- Policy KP7: Planning Obligations

- Policy KP8: Sustainable Transport
- Policy KP13: Responding to Evidenced Social Needs
- Policy KP14: Healthy Living
- Policy KP15: Climate Change
- Policy KP16: Green Infrastructure
- Policy KP17: Built Heritage
- Policy EN12: Renewable and Low Carbon Technologies
- Policy EN13: Air, Noise, Light Pollution and Land Contamination
- Policy EN14: Flood Risk
- Policy T1: Walking and Cycling
- Policy T5: Managing Transport Impacts
- Policy C3: Community Safety/Creating Safe Environments
- Policy C5: Provision for Open Space, Outdoor Recreation, Children's Play Space and Sport
- Policy C6: Health
- Policy W2: Provision for Waste Management Facilities in Development.

Other Material Considerations

Replacement Cardiff Development Plan

6.17 Cardiff Council is in the process of preparing a new Local Development Plan (LDP) for Cardiff to replace the existing LDP. Independent Examination of the RLDP is currently scheduled to begin September 2025, with the Inspector's report anticipated by March 2026, and formal adoption expected in April 2026.

6.18 The last stage of consultation, which closed in April 2025, was the Deposit Plan (January 2025). It is noted that the site continues to be located within the Central and Bay Business Area and the Cardiff Central Enterprise Zone and Regional Transport Hub in the Deposit Plan.

Planning Policy Wales 12 (PPW) (February 2024)

6.19 PPW (Edition 12) (February 2024) sets out the overarching land use planning policies for Wales.

6.20 The primary objective of PPW 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, as set out by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015.

6.21 PPW places an emphasis on Placemaking as a guiding principle for maximising well-being and creating sustainable places. PPW sets out the themes that collectively contribute to placemaking, as follows:

Strategic and Spatial Choices

6.22 Chapter 3 of PPW focuses on 'Strategic and Spatial Choices'. Paragraph 3.3 states that to achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental and cultural aspects of the development. This includes 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 3.41 notes that an essential component for a sustainable place is where development is to be located.

6.23 Paragraph 3.51 confirms that higher density development should be encouraged in urban centres and near major public transport nodes or interchanges, to generate a critical mass of people to support services such as public transport, local shops and schools. Paragraph 3.55 confirms that previously developed land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.

Active and Social Places

6.24 Chapter 4 of PPW relates to 'Active and Social Places' and covers the well-connected cohesive communities components of placemaking. Paragraph 4.1.31 confirms that new developments should be fully accessible by walking and cycling. Proposals should seek to create walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable and enjoyable to walk and cycle (maximising their contribution to the objectives of the Active Travel Act).

6.25 Paragraph 4.1.51 advises a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development.

6.26 Paragraph 4.2.1 states that new housing development should incorporate a mix of market and affordable house types, tenures and size to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities.

Productive and Enterprising Places

6.27 Chapter 5 of PPW focuses on 'Productive and Enterprising Places'. Emphasis is placed on providing well-connected employment and sustainable economic development. Paragraph 5.4.4 states that development which generates economic prosperity and regeneration should be supported. Paragraph 5.8.3 seeks to ensure that sustainable building design principles are integral to the design of new development.

Distinctive and Natural Places

6.28 Chapter 6 of PPW focuses on 'Distinctive and Natural Placemaking', covering the environmental and cultural components of placemaking. Paragraph 6.0.2 states that the special and unique characteristics and intrinsic qualities of the natural and built

environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. Paragraph 6.0.3 continues by stating that other environmental components of places, such as clean air, access to open spaces and water quality, are linked to the quality of the built and natural environment.

6.29 The environmental components of places influence and shape health and wellbeing as well as playing a role in sustaining and creating places which are adaptable and resilient to change. Chapter 6 of PPW emphasises the benefits of green infrastructure. Paragraphs 6.2.4 and 6.2.5 state that green infrastructure offers multiple benefits, for social, economic and cultural as well as environmental resilience, and plays a fundamental role in shaping places and our sense of well-being.

6.30 Paragraph 6.4.11 requires that enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

6.31 Paragraph 6.2.12 requires that a green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal.

Technical Advice Notes (TAN's)

6.32 The following technical advice notes considered relevant to the determination of the planning application:

- TAN2: Planning and Affordable Housing
- TAN11: Noise
- TAN12: Design
- TAN15: Development and Flood Risk
- TAN16: Sport, Recreation and Open Space
- TAN18: Transport
- TAN20: Planning and the Welsh Language
- TAN23: Economic Development

Supplementary Planning Guidance and Technical Guidance Notes

6.33 The Council has published a number of supplementary planning guidance documents that are relevant to the determination of the application, including:

- Tall Buildings Design Guide (2017)
- Residential Design Guide (2017)
- Managing Transportation Impacts (Incorporating Parking Standards) (2018)

- Planning Obligations (2017)
- Green Infrastructure (2017)
- Planning for Health and Wellbeing (2017)
- Protection and Provision of Open Space in New Development Technical Guidance Note (2017)
- Waste Collection and Storage Facilities (2016)

The Wellbeing of Future Generations (Wales) Act (2015)

6.34 The Act defines sustainable development in Wales. It addresses the needs of a more diverse population and larger aging demographic by providing requirements related to the integration of services, embedding social cohesion, and encouraging a sense of belonging.

6.35 The Sustainable Development Principle means that decision making must be undertaken so as to ensure that development will contribute to improving the economic, social, environmental and cultural well-being of Wales.

7. Planning Assessment

7.1 This section assesses the proposal against prevailing development plan policies, taking into account material considerations. This section therefore considers the following:

- Principle of Development
- Design
- Landscaping / Amenity Space
- Green Infrastructure
- Townscape and Visual Impact
- Daylight / Sunlight
- Wind
- Noise
- Transport / Accessibility
- Flood Risk and Drainage
- Ground Conditions
- Utilities
- Energy
- Fire
- Waste

Principle of Development

7.2 The application site lies within the defined settlement boundary and comprises brownfield, previously developed land, as defined in Planning Policy Wales (PPW). PPW clearly prioritises the use of previously developed land / existing buildings as part of its National Sustainable Placemaking Outcomes. Paragraph 3.55 of PPW confirms that previously developed land should be used in preference to greenfield sites wherever it is suitable for development. Furthermore, PPW emphasises that utilising suitable brownfield sites for housing can play a key role in supporting regeneration objectives (Paragraph 4.2.17).

7.3 The site also forms part of a wider area designated in the adopted Local Development Plan (LDP) as a 'Strategic Site' under Policy KPA2 (A): Cardiff Enterprise Zone and Regional Transport Hub. This allocation promotes a comprehensive employment-led, mixed-use redevelopment. The LDP identifies the wider strategic site as the largest

brownfield opportunity within the Plan area, offering significant potential for sustainable regeneration in the heart of the city. The allocation aligns with the LDP's overarching vision and objectives for growth and transformation.

7.4 Whilst the accompanying 'Schematic Framework' to Policy KPA2 (A) identifies the site (and adjoining land south of John Street) for business and employment uses, it is illustrative in nature and does not preclude alternative land uses that support the broader aims of the strategic allocation. The proposed residential-led development, incorporating commercial and retail uses at ground floor, is consistent with the intent of the allocation. Significant employment development has already been delivered to the south of John Street, contributing to the employment led nature of the strategic site. Introducing residential use in this context complements the wider masterplan vision, helping to create a mixed use, vibrant and sustainable urban quarter.

7.5 Policy KPA2 (A) also requires the efficient use of land by encouraging high density development in appropriate, accessible locations within the strategic site. Specifically, it supports residential densities exceeding 100 dwellings per hectare in principle. The proposed scheme responds positively to this aim, offering a high density, high-rise solution suited to its city centre context.

7.6 The application site is situated in a highly sustainable and accessible location, identified as a priority area for regeneration and growth. Under Policy 1 of Future Wales, Cardiff, alongside Newport and the Valleys, is designated as a 'National Growth Area', intended to accommodate significant new housing and employment growth.

7.7 Future Wales Policy 2 promotes increased urban densities to support public transport, local facilities, and sustainable placemaking. The proposal aligns with this vision, bringing forward a high-quality, high-density residential development in a central, well-connected location.

7.8 The scheme will deliver purpose-built Build-to-Rent (BtR) homes, all of which will be professionally managed by Grainger. The homes will be let on flexible terms and maintained to a high standard throughout their lifecycle. The BtR offer meets a specific housing need and complements the emerging character of neighbouring developments.

7.9 In addition to residential provision, the scheme includes new commercial units at ground floor of the main building and within the refurbished arches fronting Bute Street. These will be open to both residents and the wider public, helping to create an active street frontage and contribute to the vibrancy and diversity of the local area. The principle of introducing such uses at ground floor level accords with local and national planning policy. It is also noted that planning permission has previously been granted for the use of the arches for the same mix of uses as currently proposed. A hybrid permission was also granted for the wider redevelopment of the site, which included commercial uses at ground floor.

7.10 In summary, the principle of residential development on this brownfield, sustainably located site is well established in both local and national planning policy. The scheme supports key objectives in PPW, the adopted LDP, and Future Wales by contributing to regeneration, delivering much-needed housing, and promoting high-density, mixed-use

development in a strategic growth area. The proposal represents a positive and appropriate response to the site's allocation and its wider city-centre context.

Design

7.11 The design of the proposal has been carefully developed in response to the site's context and its relationship with the surrounding urban environment. Informed by a comprehensive suite of technical assessments and shaped through extensive pre-application engagement with the Council, the scheme represents a high-quality design solution that integrates sensitively and positively with its setting.

7.12 The development delivers a high-quality, contemporary residential environment that is legible, functional, fully accessible and sustainably designed. It prioritises a comfortable, well serviced living experience that supports wellbeing and reflects the needs of modern city living.

7.13 The accompanying Design and Access Statement, prepared by Chapman Taylor, sets out the architectural vision, design rationale and evolution of the scheme in detail. A summary of key design principles is provided below.

7.14 In light of the site's central and highly accessible location, a high-density approach is appropriate to optimise land use efficiency. The scheme incorporates taller built form, reaching up to 28 storeys at its highest point on the western edge of the site along Bute Street.

7.15 The height and massing strategy is contextually driven and aligns with the scale of other major residential-led developments in the immediate area, either consented or under construction. It is also pertinent that a hybrid planning permission has previously been granted for the site. This included outline permission for a 27 storey office / hotel building on the application site itself. This sets a clear precedent for introducing a building of height to the application site.

7.16 The scale and massing have been carefully designed to reflect the opportunity for a gateway development. The taller western tower addresses Bute Street, marking the entrance into Butetown and the city centre with a strong urban presence, while the eastern tower adopts a more restrained approach, stepping down in height to respond to the surrounding townscape and Cardiff's wider skyline.

7.17 The lower link block connecting the two towers provides visual relief and allows for increased daylight penetration into the central courtyard. This element introduces variation and rhythm to the overall composition while promoting connectivity across the site.

7.18 A robust and contextually sensitive material palette has been selected, drawing inspiration from local character and referencing materials seen in nearby developments. Varied brick tones, alongside aluminium detailing and glazing, will create visual richness and architectural interest throughout the elevation treatment.

7.19 In summary, the proposal represents a considered and confident design response. The scale, massing and overall architectural approach have been carefully developed in

accordance with the guidance set out in the Tall Buildings Supplementary Planning Guidance (SPG), ensuring the building is both contextually and visually appropriate. It will contribute positively to the evolving character of Bute Street and its wider setting, delivering a distinctive and high-quality addition to Cardiff's growing urban skyline.

Landscape / Amenity Space

7.20 The landscaping scheme has been prepared by Planit in close collaboration with the wider design team. The landscape proposals are set out in a series of plans and within the Landscape and Green Infrastructure Statement. The landscaping scheme has been designed to enhance the immediate setting of the proposal and includes areas of both public and private landscaped areas totalling 3,640 sq m of internal and external amenity space.

7.21 Internally, the scheme incorporates a total of 564 sq m of amenity space for future occupiers. This includes 415 sq m on the ground floor where the reception area, co-working and gym space will be situated alongside an additional 42 sq m within one of the repurposed railway arches. Further internal amenity space is incorporated at Level 6 and Level 27, which could be used for private dining and as a games room.

7.22 Externally, the landscape design introduces a green frontage along Bute Street, creating an attractive, west facing public space that benefits from evening sunlight. This area includes natural stone paving, varied planting and pockets of seating, including playful elements such as swings. A swale with resilient planting adds visual interest and supports informal play when dry. This area of public realm will greatly improve the pedestrian experience along this part of Bute Street.

7.23 A private and secure communal garden is located at the centre of the site, providing a quieter, shaded environment for residents. A winding footpath divides the garden into smaller green pockets that support both social interaction and quiet reflection. Secluded corners offer space for reading or conversation, while open areas allow for group activities. Stepping stones, continuous seating, and a secure layout promote accessibility and usability.

7.24 The garden is overlooked by a ground floor gym, which provides direct access for residents. Cycle storage is located within the main building, two of the refurbished railway arches and within a secure, external shelter. Patterned paving in the more formal northern section guides movement and softens the linear boundary along the railway.

7.25 The podium garden at Level 06 offers an elevated, sunlit space that complements the shaded ground-floor garden. It is designed as a flexible, multifunctional space for socialising, exercising, working, or relaxing. The central terrace offers long views over the canopy of the communal garden, enhancing the sense of connection across levels.

7.26 A series of distinct spaces cater to different resident needs. Larger terraces support group gatherings and events, while quieter, hedge-screened areas enable more private use. Features such as movable furniture, charging points and a planted pergola improve comfort and shade.

7.27 The podium also provides visual amenity for overlooking units, with layered planting, texture, and seasonal variety that support biodiversity. Together, the landscape strategy enhances the quality of life for residents, encourages social interaction, and contributes positively to the character of the wider development.

7.28 The provision of high quality amenity space is a fundamental part of a successful BtR development. The scheme therefore provides a range of internal and external amenity space for residents. The spaces have been designed to provide opportunities for socialising, working, relaxing and exercise amongst other activities. The proposal will also deliver a significantly enhanced public realm along Bute Street, to the benefit of residents and the wider community.

Green Infrastructure

7.29 The proposed development delivers a comprehensive Green Infrastructure (GI) strategy that enhances biodiversity, ecological connectivity and climate resilience within a dense urban setting. Guided by the DECCA framework (Diversity, Extent, Condition, Connectivity), the scheme integrates layered, pollinator-friendly planting, native shrub borders, and a diverse mix of trees tailored to microclimates across the site.

7.30 Key habitat areas include the woodland-style courtyard, landscaped roof and SuDS features such as bioswales and rain gardens that manage surface water while supporting ecological function. The design creates a connected habitat network around the building, links to existing green corridors, and includes multifunctional green spaces that provide visual, environmental and amenity benefits. A seasonally rich and low-maintenance planting palette will ensure year round interest, aligning with local and national green infrastructure policies. The GI approach is set out in detail in the accompanying Landscape and Green Infrastructure Statement.

Townscape and Visual Impact

7.31 A Townscape and Visual Impact Assessment (TVIA) has been prepared by Turley to evaluate the effects of the proposed development on local townscape character and visual receptors. The assessment, based on a detailed appraisal of the site's context and verified views, concludes that the currently vacant and hoarded site contributes little to the existing townscape. The assessment concludes the proposed scheme responds positively to the local policy context and design guidance, including the Cardiff Tall Buildings SPG and is considered suitable in this evolving urban area.

7.32 The proposed development is considered to deliver a high-quality scheme that enhances townscape legibility, introduces new public realm and contributes positively to the city's skyline without adverse impacts on key views or heritage assets.

7.33 The townscape impact is assessed as minor beneficial in the immediate area, with neutral effects elsewhere. Visual impacts vary by viewpoint, with moderate beneficial effects in localised areas such as Bute Street and Callaghan Square, and predominantly neutral effects in wider views. Overall, the proposals are judged to result in an appropriate and beneficial change to the local townscape and visual environment.

Daylight / Sunlight

7.34 A detailed daylight and sunlight assessment has been undertaken by GIA in support of the proposed development. The assessment covers both the internal amenity for future residents and the potential effects on neighbouring buildings.

7.35 The analysis demonstrates that the proposed scheme achieves good levels of internal daylight and sunlight, especially given the site's city centre location and planning objective of increased density. Of the 920 habitable rooms assessed, 82% meet the recommended levels of Median Daylight Illuminance (MDI), increasing to 87% when a more flexible MDI target of 150 lux is applied. Sunlight levels are also strong, with 79% of the 417 dwellings assessed as meeting the BRE standard of at least 1.5 hours of sunlight to at least one room on the spring equinox. Communal outdoor spaces have similarly been tested for overshadowing; two of the three amenity areas meet or exceed BRE sunlight targets, while the third, as described above, has been purposefully designed as a shaded courtyard as part of the wider landscape strategy.

7.36 In terms of neighbouring properties, eight surrounding buildings were assessed for potential impacts. Four properties (the Golden Cross Public House, Edward England Wharf, the Radisson Blu Hotel, and the Cardiff Marriott Hotel) are fully compliant with BRE daylight and sunlight recommendations. While the remaining four properties experience some shortfalls, these are considered to fall within the acceptable tolerances set out in the BRE guidance. This conclusion is supported by various site specific factors, including the urban context, neighbouring building form, the low-rise nature of the existing site, and the transient use or deep layout of some affected rooms. Furthermore, a supplementary comparison with the extant hybrid planning permission confirms that the proposed development would not materially worsen daylight or sunlight conditions to neighbouring buildings.

7.37 Overall, the development achieves a good standard of daylight and sunlight amenity for future residents and maintains reasonable impacts on surrounding properties.

Wind

7.38 A Wind Microclimate Study has been undertaken by Windtech Consultants using Computational Fluid Dynamics (CFD) modelling to assess the safety and comfort of wind conditions associated with the proposed development. The study evaluates wind impacts within the development, in its immediate surrounds and at elevated levels, including considerations under both existing and future surrounding conditions.

7.39 The study demonstrates that the majority of key areas such as entrances, pedestrian routes, and outdoor amenity spaces benefit from wind conditions that are appropriate for their intended use. Elevated levels across the development are also broadly suitable for typical activities. Where areas have been identified as marginally less suitable, such as parts of the northern and southern façades and some localised zones within nearby thoroughfares, these represent a small proportion of the overall site and are common in high-density urban environments.

7.40 Crucially, all outstanding concerns relate to comfort rather than safety and can be effectively addressed through standard ground level mitigation measures. These

typically include a combination of soft landscaping (e.g. trees, planting) and hard landscaping features (e.g. screens, planters), which will be incorporated into the final design. With such refinements in place, wind conditions across the development are expected to meet or exceed relevant comfort criteria, ensuring a safe and welcoming pedestrian environment that supports the development's role in a high-quality urban centre.

Noise

7.41 Stantec / Hydrock was appointed to provide acoustic consultancy for the proposed development. A baseline noise survey assessed existing site noise levels, and a noise model predicted overall noise at all façades during day and night. An external building fabric assessment confirmed that internal noise levels will meet BS8233 and relevant planning criteria.

7.42 An internal sound insulation review highlighted the need for appropriate floor construction between ground-floor commercial units and above residential areas to control noise transfer. A preliminary assessment of overheating and ventilation found that night-time overheating mitigation should not rely on open windows.

7.43 Noise levels at external amenity areas were assessed, noting elevated noise due to proximity to Cardiff Central station but balanced by the benefits of the location near a strategic transport hub, in line with BS8233 guidance. External plant noise limits were proposed based on background levels and will be subject to agreement with the Local Planning Authority's Environmental Health team.

Transport and Accessibility

7.44 A Transport Statement has been prepared by Apex to support the proposed development. No car parking will be provided on-site, but cycle parking for 457 bicycles will be included. This approach is fully in line with support at a local and national level for car-free developments in accessible locations.

7.45 Whilst the proposed cycle parking provision falls short of the proposed cycle parking figures set out in the Managing Transportation Impacts SPG, the Transport Statement confirms the reduced provision is considered appropriate due to the site's highly accessible central location, high propensity for walking and low local cycling rates. The level of provision is consistent with or exceeds that of other recently approved developments in Cardiff.

7.46 The Transport Statement confirms the site's highly sustainable location, which offers excellent opportunities for walking and cycling to nearby amenities, services and employment centres via quality routes. It is also within close walking distance to Cardiff Central Rail Station and Cardiff Bus Interchange, providing attractive public transport alternatives that will reduce car ownership and travel.

7.47 Analysis of local road safety data shows no existing or potential highway safety issues that the development would exacerbate. Trip generation modelling forecasts a minimal increase in vehicle movements, consistent with previous consents, reflecting the car-free approach.

7.48 Servicing of the development will be accommodated via a new layby on John Street, suitable for the expected vehicle types and demand. Swept path analysis has been undertaken, confirming that the appropriate service vehicles can be safely and effectively accommodated within the proposed layout.

7.49 The report concludes the proposed development supports sustainable travel patterns, complies with national and local transport policies (Future Wales, PPW12, TAN18, and Cardiff's Managing Transportation Impacts SPG), will not negatively impact road safety or the highway network, and is expected to receive a positive recommendation from the highway authority.

7.50 A Travel Plan sets out a range of measures that the proposal will implement to encourage sustainable and active travel among residents, promoting walking, cycling, and public transport use while discouraging car dependency. Residents will receive tailored information on safe walking routes, local amenities, and health benefits, supported by campaigns and initiatives such as walk-to-work events. To encourage cycling, the development will provide secure cycle parking for all units and share details on safe cycling routes, cycle training opportunities, local cycling clubs, and salary sacrifice schemes like Cycle to Work. Discounts with local cycle shops will be sought to support residents in obtaining cycling equipment.

7.51 Public transport use will also be promoted through information on routes, timetables, and real time travel apps, enhancing accessibility and convenience. Additionally, broadband connections will be provided in all units to support working from home, reducing the need for travel. The absence of on-site car parking further prioritises walking, cycling, and public transport as the main travel modes for residents.

Flood Risk and Drainage

7.52 The site is located within Fluvial Flood Zone 2, Surface Water Flood Zone 2, and Tidal Flood Zone 3. A Flood Consequences Assessment (FCA) has been prepared by Stantec / Hydrock in support of the proposed development. Whilst the site lies within fluvial, tidal, and surface water flood zones, modelling provided by Natural Resources Wales (NRW) confirms that the site and its access / egress points remain flood free during all modelled tidal-fluvial flood events, including scenarios accounting for sea level rise and the loss of defences.

7.53 The site benefits from extensive flood defences along the River Taff, placing it within a TAN15 Defended Zone with a 1 in 200-year standard of protection. A comprehensive Drainage Strategy has been developed to manage surface water risk, incorporating sustainable drainage systems (SuDS) such as bioretention areas, rain gardens, green/blue roofs, permeable paving, and a shallow wetland. With these measures in place, the development is considered to be at low risk from all sources of flooding.

7.54 To address residual risk, it is recommended that residential accommodation (classed as 'Highly Vulnerable') is not located at ground floor level. Mitigation measures include raising finished floor levels, using flood-resilient construction, registering for NRW flood warnings, and preparing a site-specific 'Flood Evacuation Plan'.

7.55 The development complies with TAN15 guidance, remaining flood-free during the required 1 in 100-year fluvial and 1 in 200-year tidal events (including climate change allowances), and will not increase flood risk elsewhere. The FCA concludes that the proposals are appropriate, safe, and sustainable in terms of flood risk.

7.56 The planning application is also supported by a comprehensive Drainage Strategy, which confirms that the proposed approach to site drainage has been carefully developed based on a detailed assessment of existing drainage infrastructure, site constraints and conditions. The proposed strategy includes a range of sustainable drainage systems (SuDS), designed to deliver multiple benefits including flow attenuation, water quality improvements, biodiversity enhancement and amenity value, in line with national standards and best practice.

7.57 The SuDS features will work alongside a gravity-based foul drainage system, providing a robust and sustainable drainage solution for the development. The strategy ensures surface water is managed effectively and does not increase flood risk elsewhere. Accordingly, the proposed drainage arrangements do not present a constraint to the grant of planning permission.

Ground Conditions

7.58 A Geotechnical and Geo-environmental Report for the site was prepared by Terra Firma in March 2022. This confirms that application site has a long history of development dating back to at least 1880 and has historically accommodated various residential, commercial and industrial uses.

7.59 Geological investigations indicate that the site is underlain by rocks of the Mercia Mudstone Group, which are overlain by superficial fluvio-glacial terrace deposits. Made ground was encountered across the site to depths between 0.8m and 1.8m metres, underlain by variable strata including clay, sand, gravel and cobble deposits, transitioning into weathered marl (Mercia Mudstone) at depths of 6.3 to 6.4 metres, with competent marl below.

7.60 The report confirms the site is not located in a radon protection area. While the assessment designated the site as a Gas Characteristic Situation 2, due to a carbon dioxide recording of 6.2%, a more recent Ground Gas Risk Assessment prepared by Hydrock (December 2024) determined these findings were overly conservative and the site can be downgraded to Characteristic Situation 1. This means no ground gas protection measures will be required within the detailed design of the foundations for the proposed development.

7.61 The Geo-technical report confirmed that site soils are generally uncontaminated, with the exception of a single fragment of asbestos-containing material. This area will be capped with hardstanding, eliminating any potential risk to future users.

7.62 The Ground Gas Risk Assessment (December 2024) also confirmed that prior to piling of the site, a turnover exercise of all Made Ground soils is likely to be completed (in line with what was completed for the south site) in order to remove any obstructions from the near surface soils. It is therefore anticipated that should any previously

unidentified organic/putrescible matter be encountered, this will be removed as part of the turnover exercise, further mitigating any potential risks.

7.63 A Groundwater Assessment (May 2019) prepared by Terra Firma found some substances to be elevated in the groundwater at the site. However, the report confirmed concentrations are not attributable to on-site sources and are likely linked to historical off-site activities. Given the depth of groundwater (between 3.4m and 4.4m) and the distance to the River Taff (550m), the report confirms that any contaminants present are expected to attenuate through dilution and natural processes. The report confirms there is no anticipated risk to the aquatic environment from groundwater beneath the site.

7.64 An Infiltration Testing Technical Note has also been prepared by Hydrock (November 2024) to assist in drainage design. This concluded that soakaways are not suitable in the south-western part of the site due to deep Made Ground, and also in the eastern area where cohesive Glaciofluvial Deposits prevent infiltration. In the north-west, soakaways may be feasible due to granular soils allowing infiltration, but slow rates mean their effectiveness will depend on storage capacity.

Utilities

7.65 A Utilities Assessment has been undertaken in support of the proposed scheme. The assessment confirms the development will be fully electric, with no gas provision, and utility strategies have been devised to ensure sufficient capacity and appropriate connections for all services. Existing LV electrical cables and water mains cross the site and will require disconnection or diversion to accommodate the development footprint. The existing communications infrastructure, including a BT Openreach duct, also requires diversion around the proposed building.

7.66 The proposed scheme includes new 11kV electricity supplies from the local network, feeding two on-site substations, with sufficient capacity confirmed and no need for network reinforcement. New water supplies will serve the residential and commercial elements, including sprinkler and wet riser systems. Communications infrastructure will be delivered via fibre connections from BT and Glide, with future-proofed ducting provided for commercial tenants. Existing utility provisions to the retained railway arches will be reused where possible.

7.67 The utilities strategy confirms that all necessary disconnections, diversions, and new supplies can be delivered without constraint. The report concludes there are no identified barriers to the delivery of the proposed development on utility grounds.

Energy

7.68 An Energy Statement has been prepared by AECOM in support of the proposed development. The statement confirms that a low-carbon, all-electric energy strategy will be adopted, which is aligned with national and local sustainability objectives. A fabric-first and energy efficient design approach has been embedded throughout the scheme to reduce energy demand and carbon emissions. Key passive design features include a simple building form that reduces the floor area to building envelope ratio, thereby lowering heating demand and carefully designed glazing ratios that balance

summer solar control with beneficial solar gain in winter. The development incorporates enhanced thermal performance of the building envelope through improved U-values, increased air tightness and good practice detailing to reduce thermal bridging.

7.69 In addition, the scheme integrates efficient building services, including the use of mechanical ventilation with heat recovery in all residential units, which reduces space heating demand during the heating season. All homes will feature low-energy lighting, and where provided by the developer, white goods will be selected for energy efficiency.

7.70 The proposals demonstrate a 75.8% reduction in carbon emissions and a 53.9% reduction in Primary Energy consumption compared to the Part L1 2022 baseline. All residential units are predicted to achieve a minimum SAP rating of 81 (Band B), indicating strong performance in terms of energy efficiency.

7.71 The Energy Statement demonstrates that the proposed development will be energy efficient, future-ready and capable of supporting Cardiff's transition to a net-zero carbon city.

Fire

7.72 A comprehensive Fire Strategy Report has been prepared by Helios Fire and Construction Consultants in support of the proposals. The report assesses the proposals in order to develop a fire safety strategy, which satisfies the performance requirements of the Building Regulations 2010, whilst maintaining an acceptable level of life safety, protection of adjacent property and adequate provisions for Fire & Rescue Service intervention.

7.73 The report confirms that fire appliances can be accessed within 45 meters of all amenity and commercial areas. Vehicle access is designed to avoid reversing more than 20 meters, with removable commercial seating to maintain emergency routes. Clear wayfinding signage and communication systems such as distributed antennae are installed due to the building height. Existing nearby public fire hydrants support water supply and the building has a full automatic water fire suppression system, excluding arch units. An evacuation alert system compliant with BS8629 will assist fire services, with protected dual power supplies and secure premises information boxes also incorporated.

7.74 The fire detection and alarm system supports a stay-put evacuation strategy, where only occupants directly affected by fire evacuate, while others remain in their apartments unless instructed otherwise by the fire service. Individual flats will have a Grade D1 LD2 system per BS5839-6, with smoke detectors in escape routes and high-risk rooms like kitchens and living areas. Communal areas will use a Category L5 system to activate smoke control without raising alarms to residents. Commercial units will have a linked fire detection system, with larger units having Category L3 detection and smaller units at least a manual system. Emergency lighting and signage will comply with BS9991 to ensure safe evacuation in power failures.

7.75 Further detail regarding fire safety management, internal fire spread and escape routes are set out in in the Fire Strategy. This document demonstrates that the proposed fire safety measures comprehensively address regulatory requirements and best practice guidance, ensuring effective life safety, property protection and efficient Fire & Rescue Service access.

Waste

7.76 The proposed development incorporates a comprehensive waste and recycling strategy that aligns with national and local planning guidance, including Planning Policy Wales (PPW), Technical Advice Note (TAN) 21 and relevant SPGs.

7.77 Refuse and recycling storage areas are provided within the building footprint, located adjacent to the vertical circulation cores with level access routes. Each residential tower includes its own designated waste store, with the central link building connected to both. The stores are positioned along the external façade of the building, allowing direct access from the proposed John Street layby for collection purposes.

7.78 Residents will be responsible for transferring their waste to the ground floor stores, where clearly labelled Eurobins will facilitate effective segregation of recyclable and non-recyclable materials. The building management team will oversee the rotation of bins within these stores to ensure ongoing availability of waste capacity and ease of use for residents. Collections will be scheduled on a fortnightly basis.

7.79 Commercial waste generated by non-residential units within the development will be managed separately. Each commercial tenant will be responsible for the storage and collection of their refuse within their own demise and will arrange for waste disposal independently.

7.80 All refuse stores have been designed to comply with the requirements of BS5906:2005 – Waste Management in Buildings – Code of Practice, ensuring best practice standards in terms of hygiene, accessibility, fire safety and operational efficiency.

8. Draft Heads of Terms

8.1 Discussions with the Council regarding appropriate financial contributions and obligations will take place during the determination of the application. To aid these discussions a full viability assessment will be submitted by the Applicant during the determination process. These discussions will also be informed by the Cardiff Planning Obligations SPG (January 2017), which sets out the Council's overall approach towards planning obligations.

8.2 Following this process, Heads of Terms will be agreed as necessary and a full Section 106 Agreement prepared.

9. Summary and Conclusions

9.1 This Planning Statement demonstrates that the residential-led redevelopment on land at John Street is entirely appropriate within this location and is fully compliant with both national and local planning policy.

9.2 The proposal will deliver the redevelopment of a previously developed site, which forms part of a wider strategic allocation for sustainable urban regeneration. The development will assist in transforming the area to create a residential-led mixed use community in the heart of Cardiff City Centre.

9.3 The proposal is in accordance with all tiers of planning policy. The application proposals are consistent with the strategic allocation identified under Policy KP2 (A) of the adopted LDP, where the site is proposed for mixed-use.

9.4 The site is located in a central and highly accessible location within Cardiff City Centre, with excellent access to local services and facilities. The proposal has been carefully designed to make efficient use of an underutilised site in this highly sustainable location.

9.5 Alongside other emerging schemes in the vicinity, the proposals will assist in delivering the comprehensive redevelopment and regeneration of the strategic site allocation and transform this area of the City Centre into a new sustainable community.

9.6 The supporting plans and reports submitted alongside the planning application demonstrate that there are no environmental or technical constraints to developing the site, which cannot otherwise be mitigated through the proposed development.

9.7 The development will provide a high quality design, which relates positively to both the existing and emerging street scene and site context. The proposal includes commercial space on the ground floor and within repurposed existing railway arches in order to add vitality and viability to the street. This activity will also be enhanced through the provision of a new public space fronting Bute Street.

9.8 The development will provide 417 BtR residential homes, which will help to meet the need for high quality rental accommodation. The development aims to foster a sustainable lifestyle given the central and accessible location of the site, close to a variety of public transport links and within walking distance of the amenities provided in the City Centre. The scheme is car free and provides 457 secure bicycle parking spaces in order to encourage sustainable transport modes.

9.9 The scale, form and massing of the scheme has been carefully designed to make efficient use of the site, whilst also ensuring a sensitive and appropriate development which complements the existing and emerging site context.

9.10 The proposal includes a range of high quality internal and external amenity spaces for use by residents. This includes a podium terrace, communal courtyard and semi-private gardens alongside a gym, fitness studio and designated dining and social areas. The

provision of high quality amenity spaces is fundamental to the overall BtR model and approach taken by Grainger.

9.11 The planning application has been informed by a detailed pre-application process and a collaborative approach to design development. Extensive consultation has taken place with the Local Planning Authority and key stakeholders to ensure the proposals respond positively to planning policy, site context and the aspirations for regeneration in this part of the city.

9.12 In view of the above, the proposed development represents positive sustainable development that will continue the regeneration of this area of the city centre. The proposals are policy compliant and therefore planning permission should be granted without delay.

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