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## **PLANNING STATEMENT**

**PLOT 5 PARMER WATERSIDE,  
PIERHEAD STREET,  
CARDIFF  
CF10 4AA**

Date: December 2022

Ref: 15840

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Revision	Description	Originated	Checked	Reviewed	Authorised	Date
1	Draft	HS	HS	EP	EP	13/12/2022
2	Final	HS	HS	HS	EP	16/12/2022
DWD Job Number: 15840						

## 1.0 INTRODUCTION

1.1 Cardiff Sixth Form College ('CSFC') which is part of the Dukes Education Group has agreed terms to acquire two development sites to provide a permanent new home for the College's teaching space and boarding accommodation in Cardiff. The sites which have been identified as a permanent home for the CSFC are (see Site Location Plan at Appendix 1):

- Site 1: Merchant Place and Cory's Building, Bute Place and Bute Street, Cardiff; and
- Site 2: Plot 5 Parmer Waterside, Pierhead Street, Cardiff.

1.2 The development strategy is to deliver both sites simultaneously however for the purpose of the planning application process two separate applications are being submitted for each site. This planning statement has been prepared in support of an application for full planning permission for the proposed student boarding accommodation at Plot 5, Palmer Waterside (Site 2). The proposed teaching accommodation at Merchants Place and Cory's Building, Bute Street, Cardiff (Site 1) has been progressed through a separate planning application and is currently being determined by the LPA (Ref: 22/02201/FUL and 22/02204/LBC). These applications are due to be determined by Cardiff Council in early 2023.

1.3 Full planning permission is sought from Cardiff Council for the following development:

*"The erection of a part 10-storey part 18-storey building for residential boarding accommodation, including a ground floor commercial use unit (use class A1 and A2), ancillary parking, landscaping, public realm improvement and associated works."*

1.4 This Planning Statement describes the Proposed Development and assesses the development with regards to relevant planning policies of the Development Plan, national policies and other material considerations. This Statement will also outline the material benefits of the proposal.

1.5 This application is supported by the following technical reports that should be read in conjunction with the Planning Statement:

- Application Form (submitted online);
- Transport Statement, prepared by Apex Transport Consultants;
- Travel Plan, prepared by Apex Transport Consultants;
- Design and Access Statement, prepared by Expedite Architects;
- Noise Impact Assessment, prepared by Hoare Lea;

- Landscaping Scheme, prepared by Expedite Architects;
- Flood Consequence Assessment, prepared by Expedite;
- Drainage Scheme and Drainage Statement, prepared by Expedite;
- Energy Assessment, prepared by Expedite;
- Broadband Infrastructure Statement, prepared by Expedite;
- Tree Survey Report, prepared by Arboricultural Technician Services;
- Land Contamination Assessment, prepared by Integral;
- Ecology Survey Report, prepared by Just Mammals Ltd;
- Archaeological Assessment, prepared by RRARC;
- Heritage Assessment, prepared by Ashley Davies Architects;
- Heritage Impact Statement, prepared by Ashley Davies Architects;
- Daylight and Sunlight Assessment, prepared by RWDI;
- Green Infrastructure Statement, prepared by Expedite.
- Fire Strategy, prepared by Hydrock.

1.6 In addition, the following drawings have been submitted with the application to illustrate the proposed scheme.

**Table 1.1 – Application Drawings**

DRAWING NUMBER	DRAWING TITLE
21.65-EDS-XX-XX-DR-A-(00)000-01	Site Location Plan
21.65-EDS-XX-XX-DR-A-(00)100-01	Existing Site Plan
21.65-EDS-XX-XX-DR-A-(00)201-02	Proposed Site Plan
21.65-EDS-XX-XX-DR-A-(01)200-03	Proposed Ground Floor Plan
21.65-EDS-XX-XX-DR-A-(00)301-01	Proposed Servicing Strategy
21.65-EDS-XX-XX-VS-A-(04)213-01	Proposed Thirteenth Floor 3D Overview
21.65-EDS-XX-XX-VS-A-(04)201-01	Proposed First Floor 3D Overview
21.65-EDS-XX-XX-VS-A-(04)202-01	Proposed Second Floor 3D Overview
21.65-EDS-XX-XX-DR-A-(03)026-01	Proposed EW Section 01
21.65-EDS-XX-XX-VS-A-(04)218-01	Proposed Roof Level 3D Overview
21.65-EDS-XX-XX-VS-A-(04)210-01	Proposed Tenth Floor 3D Overview
21.65-EDS-XX-XX-DR-A-(03)020-01	Proposed NS Sections 01 & 02
21.65-EDS-XX-XX-DR-A-(01)202-03	Proposed Second Floor Plan
21.65-EDS-XX-XX-VS-A-(04)200-01	Proposed Ground Floor 3D Overview
21.65-EDS-XX-XX-DR-A-(03)027-01	Proposed EW Section 02

21.65-EDS-XX-XX-DR-A-(01)218-01	Proposed Roof Plan
21.65-EDS-XX-XX-DR-A-(01)201-03	Proposed First Floor Plan
21.65-EDS-XX-XX-DR-A-(01)211-02	Proposed Eleventh Floor Plan
21.65-EDS-XX-XX-DR-A-(01)210-03	Proposed Tenth Floor Plan
644-PTA-ZZ-ZZ-DR-A-2151_S2-P01	Typical Bay Elevation, Section and Plan
644-PTA-ZZ-ZZ-DR-A-2150_S2-P01	Typical Bay Elevation, Section and Plan
644-PTA-ZZ-ZZ-DR-A-2503_S2-P04	Proposed SW and NW Elevation
644-PTA-ZZ-ZZ-DR-A-2502_S2-P04	Proposed NW Elevation
644-PTA-ZZ-ZZ-DR-A-2501_S2-P04	Proposed SE Elevation

1.7 The remainder of this Statement is set out as follows:

- Section 2 sets out further information about the Applicant and its overarching aims;
- Section 3 describes the Site and the surrounding area;
- Section 4 details the Applicant's pre-application engagement with the LPA and local community;
- Section 5 sets out the proposals for the Site that are the subject of this planning application;
- Section 6 assesses the proposed development against the relevant national and local planning policies and other material considerations;
- Section 7 sets out our overall conclusions.

## 2.0 DUKES EDUCATION AND CARDIFF SIXTH FORM COLLEGE

- 2.1 Cardiff Sixth Form College is part of Dukes Education Group Limited which was founded in 2015 and is a family of nurseries, schools and colleges in the UK. Dukes Education currently has 23 schools and colleges, and 20 nurseries. All of the schools and colleges in the Dukes Education family have been chosen for their academic excellence and individual character.
- 2.2 In addition to CSFC, the Group's schools are mainly located in London, with schools also located in Cambridge and Kent.
- 2.3 CSFC has been the top school in the UK for A Level results over the past 11 years and is one of the top A Level schools in the world. In 2009, CSFC accepted its first international students. Since then, it has expanded with more students from all over the world and in 2011 registered as a full boarding school. The majority of students currently board in college accommodation in Cardiff.
- 2.4 Students also enjoy a wide range of extra-curricular clubs and activities including debating, sport, music, drama and Duke of Edinburgh. In addition, there are a wide range of weekend activities and cultural events, as well as charity work and local work placements.
- 2.5 There are currently 365 existing pupils at the College, of which 308 are boarders. 57 are day pupils. The College currently employs 46 full time equivalent teaching staff, 40 non-teaching staff and 23 boarding staff. This is a total of 116 full time equivalent jobs.

### **Requirement for a new permanent home**

- 2.6 The College is currently in leased accommodation at Trinity Court, 21-27 Newport Road, Cardiff. The complex was not purpose built for the College, or built intentionally to be used as an educational facility, as such there are limitations for the College when using this space, such as undersized teaching spaces, lack of larger spaces for performing arts, sports or assemblies, limitations to the bespoke nature of the facilities (such as science labs and auditoriums for debating/public speaking) and poor connection between buildings at upper levels, resulting in long transfer between classes.
- 2.7 CSFC would like to increase its offering to students, both in capacity and the quality of teaching spaces and facilities. The most efficient way to ensure that the facilities are tailored to meet the needs of the students is to design a new state of the art complex across the two sites identified.

### **Project Aims**

- 2.8 The College's overarching aim is to provide a permanent new home for the College's teaching space and boarding accommodation across the two chosen sites.

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- 2.9 CSFC intend to sensitively convert and restore the Grade II listed buildings at Merchant Place and Cory's Buildings (Site 1) to provide accommodation that meets the teaching needs, whilst also retaining and preserving the building's heritage significance. In addition, a sensitively designed new 8-storey building is proposed to accommodate the larger teaching spaces, such as a sports hall and assembly halls.
- 2.10 The aim at this site is to provide high quality teaching accommodation for the learners including sports facilities, amenity space, an exam hall and other ancillary facilities. The teaching accommodation will be for a total of 500 pupils (400 boarders plus 100-day pupils). The Applicant is also proposing an innovatively designed auditorium on the roof of the new teaching accommodation building which will add interest and provide a landmark for the College.
- 2.11 The land at Plot 5 (Site 2) will be developed to deliver architecturally well-designed new build accommodation for 400 boarders, ancillary parking and other facilities to support the education use. The college accommodation buildings will seek to maximise their development potential, whilst responding to the site constraints and wider context. As set out above, this planning application relates to the boarding accommodation only. Planning permission for the educational facilities at Site 1 has been applied for through a separate planning application.
- 2.12 Further information about the two development sites and the College's aims and aspirations are set out within the supporting documents.



### 3.0 SITE LOCATION, DESCRIPTION AND PLANNING HISTORY

#### Site Location and Description

- 3.1 Plot 5 (Site 2) is located to the east of the Cardiff Millenium Centre, approximately 0.5km distance from Site 1. The site comprises of undeveloped land with no built development. A Premier Inn is located to the west of the site. A multi-storey car park is located to the northwest abutting the site, with the A4232 beyond, and the Bute Place borders the site to the southwest. To the east lies an existing dock feeder with car parking and open storage beyond and to the southeast lies office buildings. Existing boundary fencing is in situ around the Site.
- 3.2 As set out below, the Premier Inn was built pursuant to planning permission 16/00547/MJR which also included outline consent for 2 office buildings reaching a maximum height of 9-storeys. These office buildings have not come forward. For more information see the Planning History section below.
- 3.3 The site is located in the Central and Bay Business Area on the adopted proposals map.
- 3.4 The Site is not located in a Conservation Area, but it is in close proximity to the Pierhead Conservation Area.
- 3.5 With regards to flood risk, the site is shown to be located in Zone B. This area is deemed acceptable for development as site levels are greater than flood levels in the extreme (0.1%) flooding event. The site is indicated to be at low risk of flooding from all sources of flooding based on Flood Risk Assessment Wales mapping.

#### Planning History

- 3.6 A detailed search of the Council's online planning history has been undertaken for the Site and surrounding area. With regards to the background and planning history, see the most relevant planning applications set out below.
- 3.7 In addition, various minor applications or amendments to larger permissions have been granted and these applications are listed in Appendix 2.

#### [01/01355/C](#)

- 3.8 This was the original planning consent which granted permission for the Site to be used as a temporary car park for the inner harbour. The use ceased on 8<sup>th</sup> February 2006 and so has now expired and is no longer relevant.

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[16/00547/MJR](#)

- 3.9 Application 16/00547/MJR sought permission for *“Hybrid application comprising: full planning application for erection of a 210 bed hotel (class c1) (9,334 sqm GEA) fronting Bute Place, including access, service area and six disabled car parking spaces. outline planning application for the erection of two office buildings (circa 15,687 sqm GEA) including 106 surface and undercroft car parking spaces with all matters reserved other than means of access.”* Amendments to the plans were received under ref: 16/02796/MJR. The current drawings are approved under this application.
- 3.10 This application is the base consent for the Premier Inn directly to the west of the Site and also sought outline consent for two tall office buildings on the application site reaching 9-storeys in height. Phase 1 comprised the Premier Inn which is 9-storeys in height and includes an ancillary restaurant and ancillary parking. Phase 2 comprised the erection of 2 new office buildings with a GEA floorspace of approx. 15,500 sqm and reached 9-storeys in height. The development would have included ancillary under croft parking. All matters were reserved other than means of access.
- 3.11 Whilst the outline consent part of this application did not come forward, the approval of the application sets a precedent for tall buildings at the Site.

[19/01024/MJR](#)

- 3.12 Application 19/01024/MJR granted in May 2019 allowed a further three years for the submission of reserved matters applications and a further five years from the date of permission or two years from the date of the last reserved matters application to commence development. It is noted that the permission expired in May 2022 and no more reserved matters application can now be submitted.
- 3.13 The Table at Appendix 2 lists the applications relevant to the Site, including the planning permission referenced above.

## 4.0 PRE-APPLICATION ENGAGEMENT

4.1 From a planning perspective, we have identified design and good place making as one of the key considerations to ensure the new CSFC is successful and supported by the Local Planning Authority and local community. As a team we are committed to ensuring the design evolves through consultation with the local planning authority and relevant consultees. To that end we have agreed a Planning Performance Agreement with Cardiff City Council which has ensured that the design development was a collaborative process and has resulted in a high-quality development. We have undertaken a significant level of consultation with the planning authority as set out below, to ensure the proposals meet officers' aspirations (pre-application reference: PA /21/00127/MJR).

- December 2021: We attended a site visit with the planning officer, heritage officer and placemaking officer to establish the site context, constraints and opportunities. We provided some high-level feasibility studies ahead of the site visit demonstrating what bulk and massing could be achieved, whilst seeking to adhere to the site constraints and complimenting the wider context. Officers confirmed that the principle of development for a new sixth form college across the two sites was acceptable and the Applicant's aspirations to refurbish the listed buildings, alongside the new taller buildings was welcomed.
- January 2022: Two further meetings were held in January to discuss the bulk, massing and design of the buildings in addition to the energy and sustainability aspirations for the project. Officers were supportive of the overall proposals during the meetings and encouraged by our initial design options. While encouraged by our initial proposals, Officer's did not feel that the proposals at Site 2 complied with the quality required by the tall buildings SPD.
- April 2022: A meeting was held which predominantly focused on Site 2. We issued elevations and CGIs that built on the sketches and indicative proposals previously submitted through the pre-application process.
- May 2022: A further meeting was held focusing on the progress made at Site 2. Officers still considered that the proposals were bulky, and the design did not break up the massing sufficiently, consideration should be given to a stepped L-shape design. Officers also wanted to see more articulation.
- October 2022: Since the previous submissions, the Applicant appointed Patel Taylor to the design team and together with Expedite, they revisited the proposals and refined the

massing, layout and design of Site 2, Plot 5 which the October pre-application submission focussed on. Consultation with LPA Officer's continued and we received some initial positive feedback from on the initial design proposals prepared by Patel Taylor (dated September 2022). The most obvious change that we implemented is the return to the 'L' shaped building which enables the development to reach 18 storeys at the highest point on the short leg, but this steps down to only 9 storeys on the long leg which creates a stepped design in keeping with the existing hotel development and allowing the taller leg to be elegant and slender. Officers confirmed that the scale of the building was considered appropriate and work in long distance views. We also revisited the articulation and detailing of the proposed development to ensure that the detailing, depth of reveals and solid to void ratios were successful.

- November 2022: The Applicant considered Officer's minor comments on the elevational treatment and use of materials and submitted further refined designs showing the internal layout and the external articulation of the new building. Two meetings were held in November and through a number of iterations, which included simplifying the external articulation and materials palette and moving the proposed commercial use to a corner unit, Officer's confirmed that they were now content that the proposals met the aspirations for tall buildings within the Tall Buildings SPD. The Applicant's team progressed the designs on this basis.

- 4.2 The proposed development is a result of on-going engagement between Cardiff Council and involved parties since the initial pre-application was submitted on 8<sup>th</sup> December 2021. Plans were also submitted to the Design Commission for Wales (DCfW). Meetings took place with the DCfW to discuss the draft proposals on both the 17th February 2022 and the 29th March 2022. In addition, a public consultation was held at Red Dragon Centre on 11<sup>th</sup> May 2022.
- 4.3 The public consultation event was well attended with approximately 40 members of the public attending over the course of the day. All of the responses received in relation to the proposals at the Site were positive, and the scheme was very well received and considered the educational use proposed was appropriate and would provide a positive contribution to the local area.
- 4.4 For further information please see the Pre-Application Consultation Report prepared by DWD which will be submitted with this application.

## 5.0 PROPOSED DEVELOPMENT

5.1 This section of the document provides a description of the Proposed Development, with the detailed design principles discussed in the accompanying Design and Access Statement. This section should be read in conjunction with the technical documents listed in Section 1.

5.2 The full description of development comprises of:

*“The erection of a part 10-storey part 18-storey building for residential boarding accommodation, including a ground floor commercial use unit (use class A1 and A2), ancillary parking, landscaping, public realm improvement and associated works.”*

5.3 The use is considered to fall into the Sui Generis use class. The primary aim of the application is to provide CSFC with permanent high-quality boarding accommodation for its students with enhanced recreational facilities, amenity space, and other ancillary features. The proposed building is intended to be a townscape marker for the area, with a stepped design and bold colours, whilst remaining elegant and high-quality.

### New Buildings

5.4 The Site currently comprises an empty Site and although permission has been previously granted for two tall office buildings, the Site remains undeveloped. A new tall building is proposed across the majority of the Site and provides a part-10, part 18-storey development which will be designed to the highest standards to enable CSFC to increase its bespoke offering to students. The new building will be purpose built boarding accommodation for the students of Cardiff Sixth Form College, and will also include refuse and servicing, amenity space on the podium level to the rear, and extra curriculum activity areas for socialising, music practice and exercise.

5.5 The proposed massing of the building is articulated in a series of masonry buildings separated by a series of highly glazed infill volumes and has been inspired by well-known and successful student boarding accommodation across the UK. The uniformity of the internally layouts help to create a smart and ordered external window/brickwork arrangement where detailing has been included where appropriate. This helps to break up the mass of the large buildings and successfully adds interest without the building appearing too busy.

5.6 Furthermore, all volumes will have an architectural order with a two-storey base, a middle part and a two-storey / four-storey top. This approach helps create a balanced order and well-articulated facade. The division and separation of the base is created by a precast concrete canopy which runs along the building, creates covered entrances and cloister on the podium gardens.

- 5.7 The core of the lower block, which sits on the southern end of building, is articulated as a juxtaposition of a solid brick volume around the lifts and a fully glazed volume around the stairs. A series of fully glazed volumes, with metal horizontal spandrels, articulate the light infill volumes that sit between the brick blocks.

### **Internal arrangement**

- 5.8 The boarding accommodation will have capacity for 400 boarding students (200 GCSE and 200 A-level) and 17 house parents. The rooms are to be 50 twin rooms (100 students) and 300 single rooms (300 students). The majority of the building houses the bedrooms and living space for the students, which are set out in clusters, either twin or single rooms. There is also accommodation for house parents who live at the accommodation and act as a parental figure for the young students that are away from home. The house parent accommodation and communal lounges are located on the southeast corner of the building to enable them to have a separate access to the students.
- 5.9 The students will leave the new accommodation in the morning for the start of the school day and go to the new teaching block at Site 1 and are likely to spend the majority of the day in the new school building until they return back to the boarding accommodation (or home if they are a day student) after the school day has finished. The boarding accommodation is where the students will go after a long day of academia and extra curriculum activities and so it is important that the spaces are welcoming, comfortable and offer a place of relaxation. Students will also have the opportunity to socialise in the new building, so the spaces are more informal than those found at Site 1.
- 5.10 All of the catering facilities will be based at Site 1 where the pupils will eat all of their meals, as such there is no requirement for a large kitchen or dining facilities at Plot 5. This reduces the amount of waste produce and number of daily deliveries to the Site.
- 5.11 The College currently provides a range of different types of job opportunities, for employees with different skills sets, and employs 46 full time equivalent teaching staff, 40 non-teaching staff and 23 boarding staff. This is a total of 116 full time equivalent jobs, which will be transferred to the new sites. Additional staff will also be employed, as a result of the additional pupils, resulting in a total of 160 full time equivalent staff employed at the two new sites, including 30 boarding staff based at Plot 5 and 17 house parents who will also live at the boarding accommodation.
- 5.12 Internally, the boarding accommodation is split across ground plus up to seventeen stories, which comprise the following facilities:

- Ground floor: active frontages, communal area and lounges, commercial unit, main entrance, house parent entrance, administration zone, plant room and undercroft car and cycle parking;
- First Floor: landscape podium deck, communal rooms and lounges, medical centre, A-level accommodation and house parent accommodation;
- Upper levels 2 – 18: lounges, house parent accommodation and lounges, bedroom clusters for A-level and GCSE students.

5.13 As stated above, the new boarding accommodation also includes a large commercial unit on the ground floor which will create an active frontage on a prominent corner of the building and will bring economic and social benefits to the area. As this unit will be within the College's ownership, it will have the control over the future occupier to ensure it is something that complements the main use and does not cause safeguarding issues for the students. It is envisaged that this unit would benefit from a mixed A1/A3 use to give the College some flexibility on the occupier, which ideally would be some sort of gallery space with a café, that can be used by students, staff, and members of the public to use.

5.14 For more information on the internal arrangement of the buildings please refer to the Design and Access Statement.

### **Access**

5.15 The new accommodation building will be accessed by three main groups; staff, students and visitors and the access strategy has been designed with this in mind. The main entrance to the new accommodation is to the south on Pierhead Street and is a statement entrance with white concrete stairs and a striking external canopy that runs along the length of the building, starting at this point. Internally the entrance is a double height glazed void. Staff, students and visitors can use this entrance, which will be staffed at all times.

5.16 There is a second student entrance to the rear of the building by the existing dock feeder. House parents who may wish to have some privacy when access their accommodation have a private entrance from Pierhead Street with access to their apartments. There is also an admin entrance and separate entrance for the commercial unit off Pierhead Street.

5.17 With regards to vehicle and cycle access, there is an access point off Bute Place which gives access to the rear of the building between the existing car park and the Premier Inn and removes conflict with the majority of the passenger access points. Vehicles and cycles associated with the boarding

accommodation will then have direct access into the under-croft parking areas. The commercial unit will be serviced via Pierhead Street and cycle parking associated with this unit will also be accessed via Pierhead Street.

- 5.18 For more information on the site access strategy, see the Design and Access Statement submitted with this application.

### **External Design, Materials and Finishes**

#### Brickwork

The choice of design and materials is informed by the historic context of the site and surrounding area.

The local context of Cardiff Bay is characterised by landmark buildings with a historic material palette such as red terracotta brick at the Pierhead Building, cream granite stone at Cory's Building and red brick at 1 and 2 Bute Place. New modern buildings have introduced alternative material palettes within the bay. For example, the Millennium Centre in Welsh Slate and champagne coloured stainless steel or The Senedd in glass, steel and timber.

- 5.19 The proposed development will be predominantly finished in brickwork which reflects the heritage assets in a modern way, but without trying to replicate them. The main body of the new building will use brick in red and white.
- 5.20 The brickwork design will be consistent across the proposed new buildings, with the red and white brickwork becoming a theme across the development ensuring cohesion. This creates a level of visual harmony across the wider building and is sympathetic to the wider area.
- 5.21 Full details of the proposed brickwork detail are identified within the submitted Design and Access Statement and has been shown on the submitted proposed elevations and sections.

#### Landscaping, Podium and Public Realm Enhancements

- 5.22 The proposals include landscaping and public realm improvements to create safe, welcoming spaces for the students, staff and visitors. In terms of landscaping, the majority of the soft landscaping is located on the podium level at first floor where the amenity space and sporting facilities are located. The landscaping includes biodiversity features such as native planting, as recommended by the ecology consultant and the Council's ecology consultee who provided detailed comments at pre-application stage. Careful consideration has been given to the podium level and amenity spaces, as the students will use Site 2 for recreational activities during their spare time, so it has been designed to be as welcoming and interesting as possible to encourage use by students and staff.



- 5.23 The podium level includes a half sports court at the western end of the Site and a quiet area is located closer to the bedroom clusters, which includes seating and places for students to socialise and eat food. Soft landscaping features include areas of lavender and hydrangeas in planters and shrub beds.
- 5.24 In terms of public realm improvements, the following is proposed along Pierhead Street and will be secured through a Section 278 / Section 38 agreement:
- Tree grilles will be removed and replaced with flexi-pave gravel.
  - Corners will be resurfaced to match surrounding red clay pavers.
  - Resurfacing of paving and kerbing on the footway adjacent to the site boundary to provide an improved pedestrian facility and more appropriately separate this from the cycle route. This would also define this area differently from the kerbing between the carriageway and the cycle route to offer a sense of function to the footway.
  - The site will also provide block paving to match within the boundary, to create a significantly wider pedestrian footway along the boundary. This could be offered for adoption, subject to discussion with the highway authority and the applicant.
  - Enhancements to public realm in the southwestern corner of the site with tree line screening and further paving at the building frontage / pedestrian entrance. This will also incorporate Sheffield Stand cycle parking.
  - No amendments to the parking restrictions or Traffic Regulation Orders are required to deliver the public realm improvements
- 5.25 For more information on the landscaping and public realm improvements see the submitted Design and Access Statement and Transport Statement.

## 6.0 PLANNING POLICY AND ASSESSMENT

- 6.1 The Site is located within the administrative boundary of Cardiff City Council. The currently adopted development plan comprises the Cardiff Local Development Plan (LDP) 2006-2026 (January 2016). Consideration is given to the Replacement Local Development Plan 2021-2036 although this is still within consultation phase.
- 6.2 In addition to adopted Development Plan Documents, material consideration must be given to the adopted 'Planning Policy Wales' (PPW) document (Edition 11) adopted in February 2021, Future Wales: The National Plan 2040 adopted in February 2021, National Technical Advice Notes (TANs) and supplementary planning documents adopted by Cardiff Council.

### Principle of Development

- 6.3 The Site is located within the Central Bay and Business Area and is adjacent to the Mount Stuart Conservation Area. This section assesses if the principle of a new tall building for boarding accommodation associated with the College is acceptable in this location from a land use policy perspective. This section also assesses the new commercial unit proposed from a policy perspective.
- 6.4 In terms of general land use, a key principle set out in Future Wales: The National Plan is supporting the universities and educational provisions in Cardiff and considering how they can play a bigger role in the regional economy, through attracting students and supporting the local businesses and communities around them. Policy 6 'Town Centre First' directs commercial and educational development into town and city centres where intended users can easily walk, cycle and/or use public transport to access them. Whilst we consider that the new proposed use would be Sui Generis, it is akin to the uses listed in Policy 6 and should be considered acceptable.
- 6.5 The LDP sets out the Council's key priorities, one of which is building strong futures for children and young people by focusing on education, training and employment opportunities.
- 6.6 LDP Policy KP10 'Central and Bay Business Area' sets out the range of uses appropriate within the Bay and Business Area, with a focus on offices, commercial and tourism and leisure. It also notes that other uses more appropriately located in city centres would be considered acceptable – boarding accommodation associated with an educational facility is considered to fall within this category and this has been confirmed by the LPA through pre-application discussions. The addition of a commercial unit at ground floor strengthens the policy support as this is a use listed as appropriate in Policy KP10 and will bring further economic benefits to the scheme.

- 6.7 The site is considered to be a suitable and sustainable location for boarding accommodation for young students to locate, given its location in Cardiff Bay and proximity to public transport links. As confirmed in the submitted Broadband Infrastructure Statement, engagement has taken place with Openreach to confirm the gigabit/ internet capacity at the site is suitable to meet the internet demands of a school.
- 6.8 Whilst the College is not a typical employment or business use, the College is a key employer and will help to support local businesses. The College currently provides a range of different types of job opportunities, for employees with different skills sets, and employs 46 full time equivalent teaching staff, 40 non-teaching staff and 23 boarding staff. This is a total of 116 full time equivalent jobs, which will be transferred to the new sites. Additional staff will also be employed, as a result of the additional pupils, resulting in a total of 160 full time equivalent staff employed at the two new sites and a net increase of 44 jobs from the existing employment CSFC provides.
- 6.9 The proposed use would add significant footfall into the Bay area, as well as revitalise activity on the ground floor, through the provision of a main entrance fronting onto Pierhead Street and the active frontages proposed along this street, including the commercial unit. Semi active frontages using frosted glazing will also be provided to the music rooms and amenity areas, these spaces cannot be fully active due to safeguarding issues, but movement and activity will still be visible.
- 6.10 Pre-Application Feedback received on the principal of development confirmed that the proposed use as boarding accommodation for students would be considered acceptable from a land use policy perspective.
- 6.11 The Site is ideally located being positioned only a short walk away from the teaching accommodation. This provides separation for students between learning and leisure/ living accommodation, which is considered important for their wellbeing, whilst also ensuring easy access on foot for pupils and staff between the two sites. The needs of CSFC's boarders and their requirements for the lay-out of the living accommodation and ancillary facilities is bespoke to the College and how it operates. The requirements differ to the needs of student accommodation provided for university students, who are adults and have more independence. The CSFC requires houseparents' accommodation to be provided, with direct access from houseparents' accommodation to the pupils' accommodation, for pastoral care reasons. CSFC also does not require catering and dining facilities at Site 2, because this is all accommodated at Site 1. Student accommodation for university students, would require catering facilities to be provided on site, either in individual flats or communal catering. The proposed purpose-built building at the Site,

is required to provide a permanent home for the College, that is suitable for the specific needs of the boarders, both in the short and long term.

- 6.12 The redevelopment of the site for boarding accommodation and ancillary facilities to support the College students is therefore considered acceptable in principle in accordance with Policy KP10 and the Development Plan as a whole, Planning Policy Wales 2021 and Future Wales: The National Plan 2040.

### **Future Adaptability**

- 6.13 Whilst the Proposed Development has been designed to meet the needs and requirements of CSFC's boarders, the design of the building also allows for future adaptation and flexibility, should CSFC vacate the Site in the future, in compliance with policy KP5 which requires developments to have an adaptable design to respond to future requirements.
- 6.14 The ground floor has currently been designed to meet the needs of the College, providing luggage stores, music rooms, a gym and lounge. Should alternative uses occupy the Site, that have different parking, refuse, cycle parking or plant requirements, to the current provision, there is scope to adapt the spaces at ground floor to these uses.
- 6.15 At upper floors, the internal layout which is currently suited to the boarders needs, with houseparent accommodation, could be altered through the removal and reconfiguration of internal partitions. The inclusion of two separate staircases and lifts, at each end of the building along Pierhead Street, also creates flexibility in how the space could be reconfigured in the future. The external envelope of the building, with evenly spaces and generous windows, provides flexibility in how the space could be laid out internally, in the future should a different user take on the building. Through careful design consideration, the opportunity to introduce bolt- on balconies could also be explored by a future user, should they require additional amenity space, beyond the podium deck.
- 6.16 The Site will be CSFC's new permanent home for their boarders and it is expected that they will be based at the Site for many years to come. Should they vacate the Site in the long term, then planning permission would be required for the change of use of the building, to enable the alternative use to take occupation. Therefore, the Council would have the opportunity at that time to secure changes to the parking, refuse and other elements, as necessary.

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### Heritage and Archaeology

- 6.17 Policies EN9 and KP17 of the LDP 'Conservation of the Historic Environment' and 'Built Heritage', respectively, seek to protect heritage assets and only allow developments that preserve or enhance the significance of the asset. This includes Conservation Areas, and the Site is adjacent to the Pierhead Conservation Area.
- 6.18 The planning application has been accompanied by a comprehensive Heritage Assessment and also a Heritage Impact Statement. The information included within these reports has not been reproduced here, however in summary the proposal has been carefully considered to respond to, and accord with, not just the immediate context, but also the secondary context. It responds to the immediate context through its:
- Footprint, and its depth being consistent with most of the buildings around;
  - Massing, and the way its breaks down the larger mass, much as the building opposite does;
  - Materiality, and the way it responds completely to the surrounding buildings becoming a member of a visually cohesive cluster of buildings.
- 6.19 Beyond this, however, the proposal also refers, again in its choice of red brickwork, to the route which students will take between the two sites, passed the Wales Millennium Centre - a red brick façade, and passed the grade I listed Pierhead Building – a celebration of natural hot red materials. The proposed development site – as we see it now - possess little historical value, whilst the wider Docklands area might possess a much higher historical value, making the idea of change to the site acceptable. Clearly, building on the site is a significant change; however, given the above, it is a change which will have little or no impact upon the historical value of the site.
- 6.20 With regard to archaeology, a desk-based assessment has been submitted with the application that concludes that the proposed development would have an impact on any elements of the Bute East Dock and lock system which remain in-situ. These impacts may require mitigation through a programme of recording or investigation including a watching brief. These final mitigation measures will be recommended by the Council and GGAT and secured by condition.

### Design and Massing

- 6.21 LDP policy KP5 states that *“all new development will be required to be of high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces.”*

- 6.22 The policy describes a number of ways by which new development can achieve this, including responding to local character and context, providing a healthy and convenient environment for all users, achieving a resource efficient and climate responsive design and promoting the efficient use of land.
- 6.23 Ongoing pre-application discussions and design review panels contributed to the evolution of the design in line with the Council's feedback, and it is understood that officers are supportive of the current design and massing proposed.
- 6.24 The proposed development has been designed to complement the existing landmark buildings in close proximity and industrial history of the bay area. The choice of materials and finishes of the new proposed buildings have been chosen to complement and reflect the existing buildings in a contemporary way. The massing of the proposed development aligns with the previously consented scheme. The design and access statement provides an assessment of the proposed massing against the existing street scene and indicates how the development would look from nearby views.
- 6.25 In addition, the Tall Building SPD (2017) is of relevance and supplements the policies within the LDP on good design. It is acknowledged that the proposals comprise a tall building, defined in the SPD as a building of 8 storeys+ or circa 25m + and compliance with the Tall Buildings SPD has been a key consideration throughout the pre-application process. There is a general datum of height in the local context of Pierhead of 6 to 8 storeys, with buildings reaching 15 storeys in the local area. There is an opportunity to deliver a tall building creating a new townscape marker in the junction of frontages along Pierhead and the Dock Feeder. The proposed massing and height arrangement in the site is to create a stepped profile that climbs from a contextual height of 10 storeys on the southern corner of Pierhead street to a marker height of 18 storeys on the Dock Feeder corner.
- 6.26 The L-shaped design and stepped approach mediates between the height of the local context and the new proposed tall building successfully.
- 6.27 We have assessed the important views as a result of the proposals within the Design and Access Statement and consider that these are not detrimental to the local area. Further to our extensive pre-application consultation with the LPA it is now considered that the proposals are elegant and slender in form and do not appear as slab like structures. This is due to the detailed articulation and architectural form of the buildings which have been evolved over a series of iterations.

- 6.28 The submitted Design and Access Statement also considers the height and design of the proposals in more details. In addition, the submitted Fire Statement confirms the fire strategy, which has been considered as part of the design development, to ensure that the development can meet the relevant Building Regulation requirements.

### **Transport and Parking**

- 6.29 Future Wales Policy 12 states that local authorities must prioritise walking and cycling for all local travel. The Welsh Government will support the implementation of the Active Travel Act to create comprehensive networks of local walking and cycling routes that connect places that people need to get to for everyday purposes. Active travel must be an essential and integral component of all new developments, large and small. Planning authorities must integrate site allocations, new development and infrastructure with active travel networks and, where appropriate, ensure new development contributes towards their expansion and improvement.
- 6.30 Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points.
- 6.31 PPW requires require developments to encourage modal shift and be easily accessible by walking, cycling and public transport, by virtue of their location, design and provision of on and off-site sustainable transport infrastructure. Developers should also have regard to Technical Advice Note 18 which emphasises not only the role walking and cycling can have as main modes of transport for local journeys but also the considerable contribution they play in forming parts of longer journeys by public transport.
- 6.32 LDP Policy T1 'Walking and Cycling' supports development which creates walking and cycling connections to existing developments and the creation of Car-Free Zones.
- 6.33 LDP Policy T6 'Impact on Transport Networks and Services' seeks to resist development that would cause unacceptable harm to the safe and efficient operation of the highway, public highway and other movement networks including pedestrian and cycle routes.
- 6.34 The site is situated in a location which has excellent sustainable transport links and benefits from being connected to a high standard of walking and cycling infrastructure and public transport routes. It is proposed to provide a total of 102 cycle spaces across both campus sites, with 30 spaces provided at the Merchants Place and Cory's Building site and 72 spaces provided at the

Pierhead Street site. This reflects the sustainable location of the site and the operator's commitment to encouraging travel via cycle and also reflects the anticipated usage of the cycle parking facilities which is expected to be low. In addition, 6 cycle parking spaces are proposed for the commercial unit separately to the rest of the accommodation. It is not considered that there is any specific cycle parking policy requirement for this type of use, and therefore it is not appropriate to seek to apply specific parking standards to proposal. It is more appropriate to consider the specific use of the site and known behaviours from the existing College which we have done.

- 6.35 It is proposed that 14 staff car parking spaces will be provided at the boarding accommodation site at Pierhead Street, with no parking to be provided at the Merchants Place and The Cory's Building site. Staff will be expected to walk between the sites, which is considered acceptable given the short distances via suitable routes.
- 6.36 Students and staff will be able to walk (or cycle) to the site, as well as to services and facilities within appropriate distances. It is expected that only non-boarding pupils will cycle to the site. Any student that boards at the College, will be required to walk, rather than cycle between the two sites, given the short distance. In this regard, the site location is consistent with the sustainable transport policies in Future Wales and PPW11.
- 6.37 Future users will also benefit from the potential regeneration of the surrounding area as part of the Atlantic Wharf regeneration and the potential Metro scheme improvements.
- 6.38 As such, there is a realistic choice of modes of travel for all journey purposes, which will assist in constraining the level of vehicle generation from the site and minimise any impacts on the highway network from the development. The planning application is also supported by a Framework Travel Plan which covers both sites and sets out measures that will be implemented by the College to achieve sustainable travel to and from the site, and how these measures would be monitored. This is fully in accordance with transport policies in the LDP, Future Wales, TAN18 and PPW.
- 6.39 With regards to impacts to the local highway network, the Transport Statement concludes that whilst site is forecast to significantly increase vehicle movements from the consented scheme in the peak hours and over a daily period, this has considered all movements across the entire campus (and both sites) against the consented use on the Pierhead Street site. As such, the proposals would not have a not have a material impact on the operation of the local highway network, particularly as movements would be distributed across the network to different car



parking areas, rather than concentrated at the access to the Pierhead Street site. Improvements to the public realm will be provided on Pierhead Street along the site boundary to enhance the pedestrian environment and active frontage. In addition, the development would not have an unacceptable impact on road safety. This would accord with LDP Policies T1 and T6 which seeks to ensure safe and efficient operation of the highway, public transport, and other movement networks.

- 6.40 At the start and end of terms, the arrival of pupils back to College, and their departure is managed and arranged by the College. The College arranges transport for pupils, to take them to the airport and other students are able to travel via train. Very few parents pick up or drop off their children that board at the Site by vehicle, as a result of the distance parents live from the College, with many based overseas.

### **Sustainability**

- 6.41 Future Wales Policy 16 (heat networks) states that large scale mixed-use development should, where feasible, have a heat network with a renewable / low carbon or waste heat energy source. PPW reiterates this and confirms that Development proposals should:
- Mitigate the causes of climate change, by minimising carbon and other greenhouse gas emissions
  - Associated with the development's location, design, construction, use and eventual demolition; and
  - Include features that provide effective adaptation to, and resilience against, the current and predicted future effects of climate change.
- 6.42 The Welsh Government planning policy recognises an energy hierarchy. The Welsh Government expects all new development to mitigate the causes of climate change in accordance with the energy hierarchy for planning. The Welsh Government has set targets for the generation of renewable energy. The most relevant for our proposals is 'for Wales to generate 70% of its electricity consumption from renewable energy by 2030'.
- 6.43 Technical Advice Note 12 (Design) states that developments should achieve environmental sustainability by incorporating measures to reduce the environmental impact associated with buildings and minimising demand for energy, water and waste and creates opportunities for biodiversity enhancements.

- 6.44 LDP Policy EN12 'Renewable Energy and Low Carbon Technologies' seeks to ensure that development proposals maximise the potential for renewable energy and incorporate renewable and low carbon technologies.
- 6.45 An energy strategy has been prepared to support the planning application, and it details the intended fabric first approach and provides a summary of the proposed services and renewable technologies that are being incorporated within the scheme.
- 6.46 It is planned that the Cardiff Heat Network Project will distribute waste heat generated through a network of underground pipes to buildings in and around Cardiff Bay. To ensure the potential for future connection to our building, we have a dedicated area within our plantroom for the thermal substation required to be sited, in accordance with the requirements in Policy 16 of Future Wales.
- 6.47 The proposed development will include sustainability measures including high performance super insulated building fabric, an all-electric heating and cooling strategy, air source pumps for heating and cooling, and roof PV's. As a result of these measures, the Energy Statement confirms that the proposed development meets, and exceeds, the current prevailing energy efficiency standards in accordance with the UK Buildings Regulations, as well as the aims of national and local planning policy.
- 6.48 For more detailed information of the Part L compliance modelling and sustainability measures see the Energy Strategy Review submitted with the application.

### **Landscaping and Trees**

- 6.49 LDP Policy EN3 'Landscape Protection' aims to protect the character and quality of the landscape and setting of the city, acknowledging that urban areas also contain features of landscape importance.
- 6.50 The proposals include landscaping and public realm improvements to create safe, welcoming spaces for the students, staff and visitors. In terms of landscaping, the majority of the soft landscaping is located on the podium level at first floor where the amenity space and sporting facilities are located. The landscaping includes biodiversity features such as native planting, as recommended by the ecology consultant and the Council's ecology consultee who provided detailed comments at pre-application stage. Careful consideration has been given to the podium level and amenity spaces, as the students will use Site 2 for recreational activities during their spare time, so it has been designed to be as welcoming and interesting as possible to encourage use by students and staff.

- 6.51 The podium level includes a half sports court at the western end of the Site and a quiet area is located closer to the bedroom clusters, which includes seating and places for students to socialise and eat food. Soft landscaping features include areas of lavender and hydrangeas in planters and shrub beds.
- 6.52 A Landscape Plan and Green Infrastructure Statement has been provided which includes further information on these enhancements.
- 6.53 A tree survey has been prepared which has assessed no.7 category A trees and no.1 category B tree which are all proposed for retention. No.7 of the trees are located on Pierhead Street and sit just outside the application site boundary and No.1 tree (Category A) sits within the Site. Therefore, adhering to the tree protection details as found within this report the proposed development can be constructed without any significant long-term adverse impact onto the retained trees or the amenity of the area.

### **Ecology and Biodiversity**

- 6.54 Future Wales Policy 9 states that the Welsh Government will work with partners to identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.
- 6.55 In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.
- 6.56 LDP Policy EN6 'Ecological Networks and Features of Importance for Biodiversity' aims to protect Cardiff's ecological networks which are important for biodiversity. This is supported by LDP Policy EN7 'Priority Habitats and Species' which seeks to ensure that effective mitigate measures are in place to ensure that there is no reduction or harm to protected species under UK legislation.
- 6.57 Within a 2km radius of the site there is one site designated for ecological significance. This is the Severn Estuary (Wales) SSSI, SAC, SPA and Ramsar site, which is 1.4km to the south-east at its closest point.
- 6.58 Ecological surveys were conducted in spring/summer 2022 by Just Mammals, in order to consider the presence of protected species and the potential for impacts on legally protected species as a consequence of the proposed development activity.

- 6.59 In terms of the survey results, Just Mammals recorded that the area was dominated by hard standing with a small number of perennial species of plants which can tolerate a harsh environment growing around the edges and in cracks of the tarmacadam surface. A small strip of short perennial vegetation at the eastern edge adjacent to a small water body linked to Roath Basin of the former city dock area was also assessed. This narrow strip offers no potential for other protected species such as reptiles, water vole or otter as it is isolated and too small with insufficient suitable habitat to support reptiles and mammals. Limited opportunities are present for breeding birds. A single semi-mature lime tree on the plot was inspected and it contains no potential for roosting bats. No Section 7 species under the Environment (Wales) Act 2016 are recorded at the site, and overall the site is considered to be of low to negligible ecological value.
- 6.60 In terms of recommendations and mitigation, no further surveys were recommended at Plot 5, and to avoid the risk of encountering and disturbing nesting birds, the removal of the small area of vegetation at the eastern edge of the site is advised to be timed to occur outside the bird breeding season of March to August inclusive.
- 6.61 In addition to the biodiversity information submitted, the Applicant has submitted a Green Infrastructure Statement in compliance with the Green Infrastructure SPD (2017). The Statement concludes that the existing green infrastructure on the development site, and the potential impacts upon it have been adequately considered.

### **Drainage and flood risk**

- 6.62 Future Wales Policy 8 states that flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported.
- 6.63 PPW states that the provision of SuDS must be considered as an integral part of the design of new development and considered at the earliest possible stage when formulating proposals for new development. Development should reduce, and must not increase, flood risk arising from river and/or coastal flooding on and off the development site itself. In addition, development should not cause additional run-off, which can be achieved by controlling surface water as near to the source as possible by the use of SuDS.
- 6.64 Developers should also have regard to Technical Advice Note 15 which sets out technical guidance which supplements the policy set out in Planning Policy Wales in relation to development and flooding. It advises on development and flood risk as this relates to sustainability principles, and provides a framework within which risks arising from both river and coastal flooding, and from additional run-off from development in any location, can be assessed.

- 6.65 LDP Policies EN10 'Water Sensitive Design' and EN14 'Flood Risk' seek to ensure development would not increase the rise of flooding or additional run off from through the use of water sensitive design and Sustainable Urban Drainage Systems (SUDS).
- 6.66 We also acknowledge the requirement for approval from the SuDS Approval Body (SAB) before construction can commence, which we are progressing in tandem with the planning application.
- 6.67 With regards to flood risk, the site is shown to be located in Zone B. This area is deemed acceptable for development as site levels are greater than flood levels in the extreme (0.1%) flooding event. The site is indicated to be at low risk of flooding from all sources of flooding based on Flood Risk Assessment Wales mapping. Suitable pedestrian access is available to and from the site to areas outside of the floodplain.
- 6.68 With regards to drainage, to mitigate the proposed developments impact on the current runoff regime through the increased rate of runoff that would result due to the impermeable areas introduced; it is proposed to incorporate surface water attenuation and storage as part of the development proposals.
- 6.69 For more information see the Flood Consequence Assessment and Drainage Strategy submitted with the application.

### **Neighbouring Amenity**

- 6.70 PPW states that in proposing new developments, planning authorities and developers must:
- Address any implication arising as a result of its association with, or location within air quality management areas, noise action planning priority areas or areas where there are sensitive receptors;
  - Not create areas of poor air quality or inappropriate soundscape;
  - Seek to incorporate measures which reduce overall exposure to air and noise pollution and create appropriate soundscapes.
- 6.71 Technical Advice Note 11 (Noise) states that local authorities should ensure noise does not cause an unacceptable level of disturbance, unacceptable levels of noise should not normally be permitted.
- 6.72 LDP Policy EN13 'Air, Noise, Light Pollution and Land Contamination' states that 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.

#### Amenity

- 6.73 The submitted Design and Access Statement gives regards to the proposed development's massing and impacts of the new use on nearby properties, and it is noted that the properties in the local area reach up to 15-storeys in height and as such the proposed development is not overly ambitious.
- 6.74 Regarding impacts on daylight and sunlight, the supporting Daylight and Sunlight Assessment states that the proposed development would impact on the residential buildings immediately to the south of the development, but this is only by a small amount and not below 80% of what is currently available so does not fall below BRE guidelines. Some impact is not unexpected given the scale of the proposals and any significant uplift at this location would result in an impact. The Assessment also confirms that the Premier Inn, located immediately to the west was predicted to be impacted to a small extent. The VSC level for its lower windows, was predicted to be below 80% of what is currently available which is below BRE guidelines. However, given the use of this building, the occupancy is expected to be more transient than a residential building and therefore a reduction in skylight access can be considered less impactful. Impact on the other surrounding buildings was considered to be not significant.

#### Noise

- 6.75 A Noise Impact Assessment has been submitted with the application which assesses the existing noise levels in the surrounding area and predicts the noise levels on the proposed facades of the proposed development. External building plant and the proposed sports court are the only noise source considered capable of generating meaningful levels of noise liable to adversely impact on nearby sensitive receptors.
- 6.76 The sports courts would be capable of resulting in noise disturbance at the nearby Premier Inn, but this is only probable under the conservative assumption that daytime rest/sleep could occur with windows open at the Premier Inn, during use of the sports courts.
- 6.77 Whilst both the plant noise and noise incident on the proposed development facades will require more attention during the detailed design of the proposed development, the indicative assessments carried out show that the current proposed development can be suitable acoustically, provided the design measures specified are implemented. As such the proposals comply with the relevant national and local policy.

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### **Refuse and Servicing Strategy**

- 6.78 LDP Policy W2 'Provision of Waste Management Facilities in Development' aims to ensure adequate provision is made for waste management facilities with new developments.
- 6.79 Refuse storage is proposed to be located within the service level of the proposed new building at ground floor. This includes mixed recycling, food waste and non-recycling waste storage and the storage area has been increased for future growth. The amount of refuse storage provided is based upon the College's long-term experience of the waste requirements of existing pupils and the facilities provided at the existing site. It is proposed that the waste will be collected on a fortnightly basis via Cardiff Council services.
- 6.80 The proposed access for the services will be via the Caspian Way entrance to the rear of the building, in via the car park. This will be a security checked access with gates and the appropriate check in and out where needed.
- 6.81 Please see the proposed servicing strategy and the submitted Design and Access Statement for further details on the location and amount of refuse storage to be provided.

### **Summary**

- 6.82 The principle of development at this Site, of up to 18-storeys for boarding accommodation for use by Cardiff Sixth Form College, with ancillary commercial uses would be considered acceptable as confirmed throughout this Planning Statement and at pre-application stage by Officers.
- 6.83 The impact of the new use has been considered through a suite of robust technical assessments and would maintain and enhance the vitality and viability of the Bay Business Area through the wider economic benefits the College would encourage. Similarly, the scale and massing of the new development would complement the scale of development already present in the bay and would introduce a townscape marker for the area which reflects the existing prominent buildings in proximity.
- 6.84 The above information and technical reports submitted with this application also confirms that the proposals comply with the detailed development management policies within Future Wales, Planning Policy Wales, the Technical Advice Notes and the Local Development Plan.

## 7.0 SUMMARY AND CONCLUSION

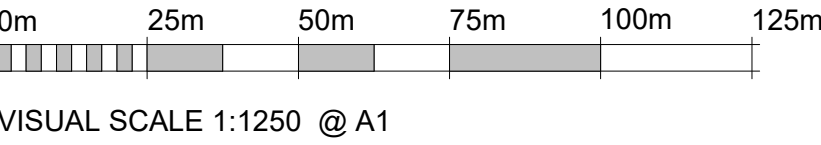
- 7.1 The application seeks planning permission and listed building consent from Cardiff City Council for:
- 7.2 *“The erection of a part 10-storey part 18-storey building for residential boarding accommodation, including a ground floor commercial use unit (use class A1 and A2), ancillary parking, landscaping, public realm improvement and associated works.”*
- 7.3 The College’s overarching aim is to provide a permanent new home for the College’s teaching space and boarding accommodation across the two chosen sites.
- 7.4 The proposed development will enable the College, which is currently in unsuitable leased accommodation at Trinity Court, 21-27 Newport Road, Cardiff to further expand its offering as an educational establishment both in terms of student capacity and the bespoke nature and standard of boarding accommodation.
- 7.5 The massing of the proposed development follows the established principles of the consented development and is sympathetic to the existing developments within the Bay area, and therefore is considered acceptable in principle.
- 7.6 With regards to impacts on heritage assets, the proposed development is considered acceptable given that the development site – as we see it now - possess little historical value, whilst the wider Docklands area might possess a much higher historical value, making the idea of change to the site acceptable. Clearly, building on the site is a significant change; however, given the above, it is a change which will have little or no impact upon the historical value of the site.
- 7.7 With regards to potential impacts on the archaeology assets, it is noted that the development may impact on archaeological significant assets, and mitigation measures are likely to be recommended by stakeholders.
- 7.8 The proposed development also includes landscaped amenity within a large podium level on the ground floor, and public amenity improvements to the frontages of the existing buildings to provide a safe and welcoming facility for students, staff and visitors.
- 7.9 The amenity impacts of users of the proposed developments and nearby occupiers has also been considered. The Design and Access Statement and suite of technical documents confirms that there will be manageable impacts on nearby users from a noise, daylight/sunlight and overshadowing perspective. It is considered that these impacts are outweighed in the planning balance by the significant benefits proposed by this development and that at Site 1.



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- 7.10 The proposed development will comply with the ecology mitigation and enhancement measures as identified in the submitted ecology report. This will largely comprise the mitigation measures for birds and large areas of appropriate landscaping.
- 7.11 The proposed development will include sustainability measures including high performance super insulated building fabric, air source heat pumps, and roof PV's. These measures will result in the proposed development complying with, and exceeding the requirements of Part L of the building regulations and necessary planning policies.
- 7.12 Regarding transport impacts, the Proposed Development is in a highly sustainable location and will generate very few vehicle movements, as pupils will move between the Sites and other local services on foot, by bicycle or on public transport. The site is forecast to increase vehicle movements from the consented scheme in the peak hours and over a daily period. This has considered all movements across the entire campus (and both sites) against the consented use on the Pierhead Street site. As such, the proposals would not have a material impact on the operation of the local highway network, particularly as movements would be distributed across the network to different car parking areas, rather than concentrated at the access to the Pierhead Street site.
- 7.13 With regards to flood risk, the site is shown to be located in Zone B. This area is deemed acceptable for development as site levels are greater than flood levels in the extreme (0.1%) flooding event. The site is indicated to be at low risk of flooding from all sources of flooding based on Flood Risk Assessment Wales mapping.
- 7.14 In summary, this application has been designed to provides a high-quality design for the new use proposed and meets all technical requirements. Significant weight should be afforded to the socio-economic benefits of relocating CSFC to the Bay area, which should for the reasons set out within this statement be viewed positively by officers.
- 7.15 Throughout the preparation of the application, we have sought to engage with the LPA, local stakeholders and local residents to ensure that the development not only responds to the physically context of the Bay area, but also the desires of the local community which we hope we have achieved. We therefore hope that the application can be determined positively in order to provide these benefits to the college and wider Bay area.

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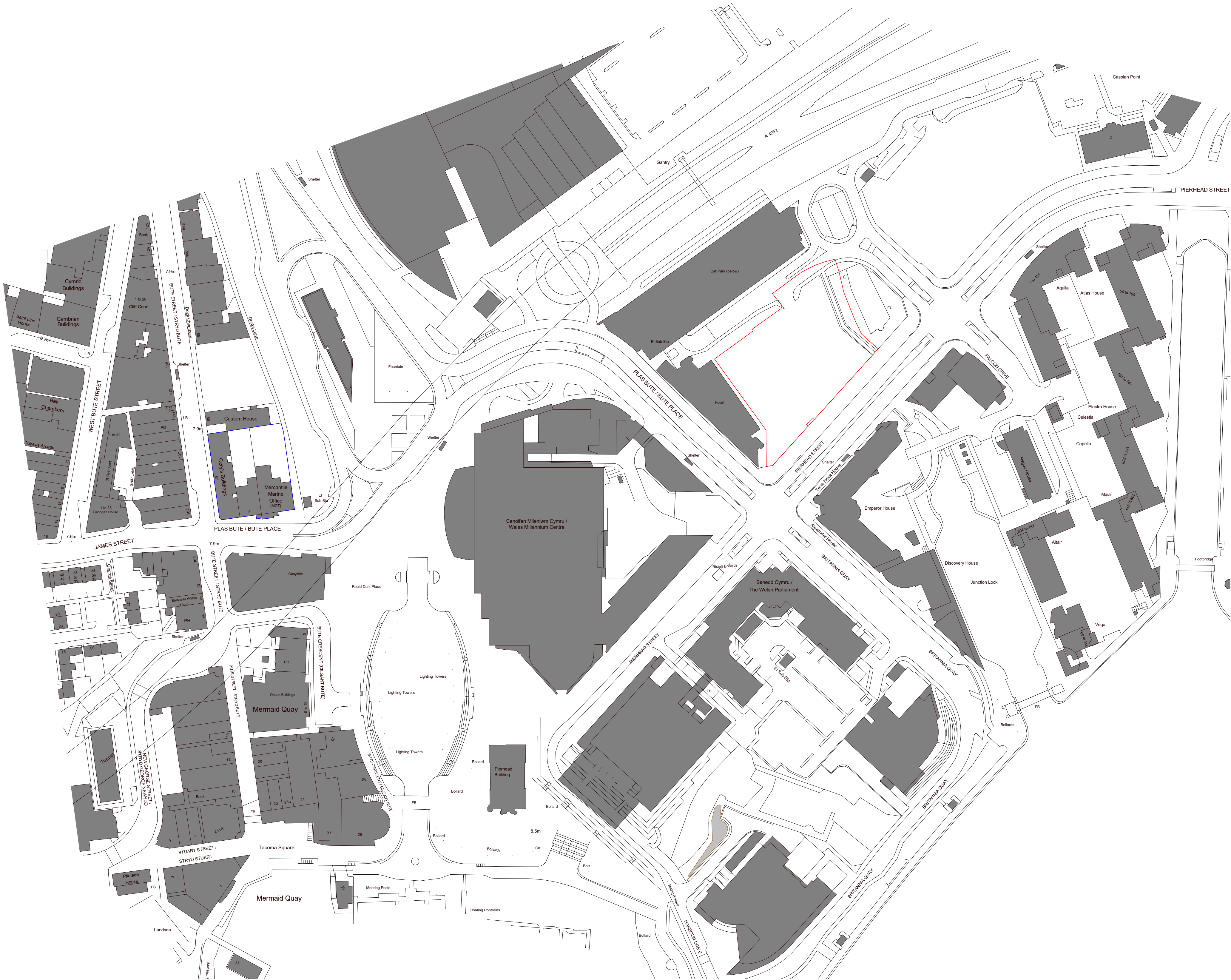
## **APPENDIX 1 – SITE LOCATION PLAN OF BOTH SITES**



Key

Application Boundary (Site 2)

College Site (Site 1)



01	Issued for pre-application consultation	16.12.22	ML
Revision	Description	Date	Issued

EXPEDITE

DESIGN SERVICES LTD

RIBA

Chartered Practice

Client's Name

Cardiff 6th Form College

Job Title

Cardiff 6th Form Boarding Hub

Status	Suitability
Planning	S2

Scale

1 : 1250 @ A1

Document Reference

21.65-EDS-XX-ZZ-DR-A-(00)000

Drawing Title

Location Plan

Drawing Number	Revision
(00)000	01



## APPENDIX 2 – PLANNING HISTORY

LPA Ref	Description of Development	Decision	Date Approved
19/01024/MJR	Variation of conditions 2c of 16/00547/MJR to allow a further 3 years for the submission of an application for the approval of reserved matters and 2d to allow 5 years expiration from the date of permission or 2 years from the date of the last reserved matters application, removal of conditions 11 (contamination) as discharged and variation of conditions 22 and 26 to relate to phase 2	Granted Permission	20 <sup>th</sup> May 2019
18/02512/MJR	Discharge of conditions 13 (remediation scheme), 14 (contamination), 16 (aggregate), 17 (imported soil), 18 (site won recycled aggregate materials), 21 (mechanical extraction) and 29 (travel plan) of planning permission 16/00547/MJR	Full Discharge of Condition	20 <sup>th</sup> December 2018
A/17/00166/MNR	Signage associated with premier inn hotel	Granted Permission	27 <sup>th</sup> October 2017
16/02540/MJR	Discharge of conditions 3 (phasing plan), 5 (external finishing materials), 6 (architectural detailing), 7 (hard and soft landscaping), 10 (drainage), 19 (piling details), 22 (archaeological scheme), 26 (site access) and 28 (boundary treatment) of 16/00547/MJR	Full Discharge of Condition	21 <sup>st</sup> December 2016
16/02796/MJR	Minor alterations to plans previously approved under 16/00547/MJR	Granted Permission	22 <sup>nd</sup> December 2016
16/02002/MJR	Discharge of conditions 11, 12 (contamination) and 15 (gases) of 16/00547/MJR	Full Discharge of Condition	1 <sup>st</sup> November 2016
16/00547/MJR	Hybrid application comprising: full planning application for erection of a 210 bed hotel (class c1) (9,334 sqm GEA) fronting Bute Place, including access, service area and six disabled car parking spaces. outline planning application for the erection of two office buildings (circa 15,687 sqm GEA) including 106 surface and undercroft car parking spaces with all matters reserved other than means of access.	Granted Permission	17 <sup>th</sup> June 2016
14/02961/MJR	Variation of condition 1c and 1d of outline planning permission 09/00589/C (subsequently varied by 12/00283/DCI) to allow extension to the period for the	Granted Permission	25 <sup>th</sup> February 2015

	application for reserved matters and an extension to the period of commencement of the development at plot 5, assembly square.		
09/00589/C	22,994m2 office floor space (use class B1) and associated parking and access, the ground floor of which is to be used for retail (use class A1) and/or food and drink (use class A3), and/or offices (use class B1) under the provisions of article 3, schedule 2, part 3, class e of the town and country planning (general permitted development) order 1995 (variation of conditions 1C and 1D of planning permission 05/2747C to extend the period for the submission of applications for the approval of reserved matters and for the commencement of development)	Granted Permission	27 <sup>th</sup> May 2009
02/01588/C	Office development including dedicated on-site parking and multi storey car park	Withdrawn	24 <sup>th</sup> April 2007
05/02747/C	22,994 SQ M class B1 office floor space and associated parking and access, the ground floor of which to be used for class A1 (retail) and/or class A3 (food and drink) and/or class B1 (office) under the provision of article 3, schedule 2, part 3, class E of the town and country planning (general permitted development) order 1995	Granted Permission	14 <sup>th</sup> August 2006
06/00251/C	Variation of condition 2 of planning permission no. 01/1355c	Granted Permission	13 <sup>th</sup> March 2006
98/02009/C	Modification of condition 1.2 of permission no. 94/305r to extend the validity of the consent by three years	Withdrawn	5 <sup>th</sup> August 2003
02/00784/C	Modification of condition 6 of planning permission 01/1355c of 16 august 2001.	Granted Permission	10 <sup>th</sup> May 2002
01/01355/C	Temporary car park comprising 207 commuter spaces (dedicated to NCM) and 148 visitor spaces for general purpose visitors to the inner harbour	Granted Permission	16 <sup>th</sup> August 2001
99/00263/C	Provision of a temporary at grade car parks - see proposal statement	Withdrawn	3 <sup>rd</sup> July 2001