

COMMITTEE DATE: 07/02/2018

APPLICATION No. **17/01292/MJR** APPLICATION DATE: 06/06/2017

ED: **BUTETOWN**

APP: TYPE: Outline Planning Permission

APPLICANT: Dovey Estates.

LOCATION: LAND AT SUFFOLK HOUSE, TRADE STREET, BUTETOWN,
CARDIFF, CF10 5DT

PROPOSAL: OUTLINE PLANNING PERMISSION FOR THE DEMOLITION
OF EXISTING BUILDINGS AND REDEVELOPMENT OF THE
SITE FOR NEW STUDENT RESIDENTIAL ACCOMMODATION

BACKGROUND INFORMATION

This application (as originally submitted) was considered by Planning Committee at its meeting of 13 December 2017, where it was resolved to defer a decision in order for Officers to examine potential reasons for refusal of consent, on grounds of excess scale and massing, and impact on adjoining land. (included in paragraph 12.1).

However, since the previous meeting amended plans have been submitted. The amended plans are shown in this report, along with the previous plans. Neighbouring occupiers were not notified of the amended plans having regard to paragraph 8.2.10 of the Welsh Government's Development Management Manual (Revision 2, May 2017) which states: *It is at the LPAs discretion as to whether they should undertake an additional publicity exercise if an application is amended, or additional information is submitted once the publicity and consultation periods have passed but the application has not been determined.*

In this case, having regard for the indicative nature of the amended plans, the fact that no comments were received from adjacent occupiers in respect of the original submission, and that the amended indicative plans show a reduced impact on immediately adjacent occupiers, only Local Members and interested Service Areas have been re-consulted. Amended comments received are noted in this report and any further comments received will be reported to Committee. South Wales Police have also been notified of the amended plans and their additional comments are noted in this report.

The Officer report has been updated to reflect the amended plans to be considered by planning committee.

In order to provide full transparency, the original report is also included following the potential reason for refusal (Appendix 1).

RECOMMENDATION 1 : That, subject to relevant parties entering into a binding planning obligation in agreement with the Council under **SECTION 106** of the Town and Country Planning Act 1990, within 6 months of the date of this resolution unless otherwise agreed by the Council in writing, in respect of matters detailed in paragraph 10.1 of this report, planning permission be **GRANTED** subject to the following conditions:

1. C00 Standard Outline
2. The consent relates to the following approved plans and documents:

Plans

O.S. Site Location Plan	
AL(01)01	Proposed Site Plan
AL(01)02	Proposed Ground Plan
AL(01)03	Proposed First Floor Plan
AL(01)04	Proposed Second Floor Plan
AL(01)05	Proposed Third Floor Plan
AL(01)06	Proposed Fourth Floor Plan
AL(01)07	Proposed Fifth Floor Plan
AL(01)08	Proposed Sixth Floor Plan
AL(01)09	Proposed Seventh Floor Plan
AL(01)10	Proposed Elevations
AL(01)11	Proposed Elevations
S.7591-SK01	Proposed Drainage Strategy
20883-1	Site Survey
20883-2	Site Survey

Documents

Asbri Planning Statement	March 2017
Asbri Design & Access Statement	March 2017
Asbri Pre-Application Consultation Report	June 2017
Smart Associates Drainage Strategy ref: S.7591	March 2017
Asbri Drainage E-mail	07 Nov 2017
JBA Consulting Flood Consequences Assessment	May 2017
Acer Ecology Bat Report	Oct 2015
Dusk to Dawn Ecology Bat Report	June 2017
Asbri Travel Plan	March 2017
Asbri Transport Statement	March 2017
Terra Firma Site Investigation	April 2017
C2J Planning Statement Additional Information	28 Nov 2017
C2J Addendum to Design & Access Statement	05 Jan 2018

Reason: for the avoidance of doubt.

3. Unless otherwise agreed in writing by the local planning authority, the development shall accord with the general layout scale and massing

principles as set out in the approved indicative plans.

Reason. To ensure that the development accords with the principles of the approved indicative plans and in the interests of visual amenity.

4. Prior to the commencement of any development works a scheme to investigate and monitor the site for the presence of gases* being generated at the site or land adjoining thereto, including a plan of the area to be monitored, shall be submitted to the Local Planning Authority for its approval.

Following completion of the approved monitoring scheme, the proposed details of appropriate gas protection measures to ensure the safe and inoffensive dispersal or management of gases and to prevent lateral migration of gases into or from land surrounding the application site shall be submitted to and approved in writing to the LPA. If no protection measures are required then no further actions will be required.

All required gas protection measures shall be installed and appropriately verified before occupation of any part of the development which has been permitted and the approved protection measures shall be retained and maintained until such time as the Local Planning Authority agrees in writing that the measures are no longer required.

* 'Gases' include landfill gases, vapours from contaminated land sites, and naturally occurring methane and carbon dioxide, but does not include radon gas. Gas Monitoring programmes should be designed in line with current best practice as detailed in CIRIA 665 and or BS8485 year 2007 Code of Practice for the Characterization and Remediation from Ground Gas in Affected Developments,.

Reason: To ensure that the safety of future occupiers is not prejudiced in accordance with policy EN13 of the Cardiff Local Development Plan

5. Prior to the commencement of the development an assessment of the nature and extent of contamination shall be submitted to and approved in writing by the Local Planning Authority. This assessment must be carried out by or under the direction of a suitably qualified competent person * in accordance with BS10175 (2011) Code of Practice for the Investigation of Potentially Contaminated Sites and shall assess any contamination on the site, whether or not it originates on the site.

The report of the findings shall include:

- (i) a desk top study to identify all previous uses at the site and potential contaminants associated with those uses and the impacts from those contaminants on land and controlled waters. The desk study shall establish a 'conceptual site model' (CSM) which identifies and assesses all identified potential source, pathway, and receptor linkages;

- (ii) an intrusive investigation to assess the extent, scale and nature of contamination which may be present, if identified as required by the desk top study;
- (iii) an assessment of the potential risks to:
 - human health,
 - groundwaters and surface waters
 - adjoining land,
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - ecological systems,
 - archaeological sites and ancient monuments; and
 - any other receptors identified at (i)
- (iv) an appraisal of remedial options, and justification for the preferred remedial option(s).

All work and submissions carried out for the purposes of this condition must be conducted in accordance with DEFRA and the Environment Agency's 'Model procedures for the Management of Land Contamination, CLR 11' (September 2004) and the WLGA / WAG / EA guidance document ' Land Contamination: A guide for Developers' (2012), unless the Local Planning Authority agrees to any variation.

* A 'suitably qualified competent person' would normally be expected to be a chartered member of an appropriate professional body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

Reason: To ensure that information provided for the assessment of the risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems is sufficient to enable a proper assessment in accordance with policy EN13 of the Cardiff Local Development Plan.

6. Prior to the commencement of the development a detailed remediation scheme and verification plan to bring the site to a condition suitable for the intended use by removing any unacceptable risks to human health, controlled waters, buildings, other property and the natural and historical environment, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include all works to be undertaken, proposed remediation objectives and remediation criteria, a timetable of works and site management procedures.

Reason: To ensure that any unacceptable risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

7. The remediation scheme as approved by the LPA must be fully undertaken in accordance with its terms prior to the occupation of any part of the development unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works. Within 6 months of the completion of the measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be submitted to and approved in writing by the Local Planning Authority.
Reason: To ensure that any unacceptable risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.
8. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing within 2 days to the Local Planning Authority, all associated works must stop, and no further development shall take place unless otherwise agreed in writing until a scheme to deal with the contamination found has been approved. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme and verification plan must be prepared and submitted to and approved in writing by the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing by the Local Planning Authority. The timescale for the above actions shall be agreed with the LPA within 2 weeks of the discovery of any unsuspected contamination.
Reason: To ensure that any unacceptable risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems are minimised.
9. Any topsoil [natural or manufactured], or subsoil, to be imported shall be assessed for chemical or other potential contaminants in accordance with a scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority in advance of its importation. Only material approved by the Local Planning Authority shall be imported. All measures specified in the approved scheme shall be undertaken in accordance with the relevant Code of Practice and Guidance Notes. Subject to approval of the above, sampling of the material received at the development site to verify that the imported soil is free from contamination shall be undertaken in accordance with a scheme and timescale to be agreed in writing by the LPA.
Reason: To ensure that the safety of future occupiers is not prejudiced.
10. Any aggregate (other than virgin quarry stone) or recycled aggregate material to be imported shall be assessed for chemical or other potential contaminants in accordance with a scheme of investigation

which shall be submitted to and approved in writing by the Local Planning Authority in advance of its importation. Only material approved by the Local Planning Authority shall be imported. All measures specified in the approved scheme shall be undertaken in accordance with Pollution Control's Imported Materials Guidance Notes. Subject to approval of the above, sampling of the material received at the development site to verify that the imported soil is free from contamination shall be undertaken in accordance with a scheme and timescale to be agreed in writing by the LPA.

Reason: To ensure that the safety of future occupiers is not prejudiced.

11. Any site won recycled aggregate materials shall be assessed for chemical or other potential contaminants in accordance with a scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority in advance of its reuse. Only material approved by the Local Planning Authority shall be reused.

Reason: To ensure that the safety of future occupiers is not prejudiced.

12. No building shall be occupied until the drainage system for the site, as shown on plan no. S.7591-SK01 has been constructed, in accordance with the approved details. No work shall be undertaken on the brickwork public combined sewer in Trade Street and surface water flows from the development shall communicate indirectly to the public sewer through an attenuation device that discharges at a rate not exceeding 5l/s.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

13. In respect of the potential impact of contamination of controlled waters, reports on monitoring, maintenance and any contingency action carried out in accordance with a long-term monitoring and maintenance plan shall be submitted to the Local Planning Authority as set out in that plan. On completion of the monitoring programme a final report demonstrating that all long-term site remediation criteria have been met and documenting the decision to cease monitoring shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that longer term remediation criteria relating to controlled waters have been met and that there are no unacceptable risks to controlled waters following remediation of the site.

14. No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

The applicant is referred to the SuDs Manual (CIRCA C697, 2007) the Sustrans website <http://www.sustrans.org>, and draft National Standards for SuDs (Defra, 2011) for further information.

Reason: There is an increased potential for pollution of controlled waters from inappropriately located infiltration systems such as soakaways, unsealed porous pavement systems or infiltration basins.

15. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

Reason: There is an increased potential for pollution of controlled waters from inappropriate methods of piling.

16. Prior to implementation a noise assessment shall be carried out and submitted to the Local Planning Authority to ensure the noise emitted from fixed plant and equipment on and around the site achieves a rating noise level of background -10dB at the nearest noise sensitive premises when measured and corrected in accordance with BS 4142: 2014 (or any British Standard amending or superseding that standard).

In addition the noise assessment must also take into consideration a scheme of sound insulation to protect the residents from the developments ground floor retail units, and TAN11 to assess noise from mixed sources.

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected, in accordance with policy 2.24 of the deposit Unitary Development Plan

17. Prior to completion of the development a scheme (Construction Environmental Management Plan) to minimise dust emissions arising from demolition and construction activities on site shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of dust suppression measures and the methods to monitor emissions of dust arising from the development. The construction phase shall be implemented in accordance with the approved scheme, with the approved dust suppression measures being maintained in a fully functional condition for the duration of the construction phase.

Reason: To assess air quality and agree any mitigation measures that may be required to safeguard the amenity of nearby residents in the area.

18. Notwithstanding the submitted plans, prior to any above ground development, details of the facilities for refuse storage, which shall have regard to the information contained in the email to the agent dated 07 July 2017, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. The facilities shall be provided prior to the beneficial occupation of the development and shall thereafter be retained and maintained.

Reason. To ensure an orderly form of development and to protect the amenities of the area.

19. Notwithstanding the approved plans, no above-ground development shall take place until details of the undercover and secure cycle parking facilities for 135 cycles has been submitted to and approved in writing by the Local Planning Authority and the development shall not be brought into beneficial use until the approved scheme is implemented.
Reason: To ensure that adequate provision is made for the secure parking of cycles.
20. No part of the development hereby permitted shall be occupied until a travel/parking/traffic/resident/letting management plan to include, but not limited to, the promotion of walking, cycling, public transport and other alternatives to the ownership and use of the private car; the management of student drop-off and collection/traffic at the start and end of term; the control of vehicular access to the site and the exclusion, and control of student resident car parking within the site and surrounding area, has been submitted to and approved by the Local Planning Authority.
Reason: in the interest of highway safety and to regulate the impact of the development on use of the adjacent highway.
21. No part of the development hereby permitted shall be commenced until a scheme of construction management has been submitted to and approved by the Local Planning Authority, to include as required but not limited to details of site hoardings, site access and wheel washing facilities. Construction of the development shall be managed strictly in accordance with the scheme so approved.
Reason: In the interests of highway safety and public amenity.
22. Any reserved matters application submitted in respect of site layout and building appearance shall include full details of site security measures including (but not limited to) on-site external lighting, on site CCTV (including arcs of camera coverage outside the site perimeter), details of monitoring the CCTV feeds and manned on-site security, and door/gate entry systems. The details shall be in accordance with the security measures indicated in the approved documents and shall be implemented prior to the beneficial occupation of the development and thereafter retained and maintained.
Reason. To make appropriate provision for the safety and security of future occupiers, in the interests of crime prevention.
23. Any reserved matters application submitted in respect of landscaping shall include (but not be limited to) the following elements:
 - A scaled planting plan
 - A Plant schedule
 - Topsoil and subsoil specification
 - A tree pit plan and sectional views for hard and soft landscaped

areas

- A planting and aftercare methodology
- Confirmation that the landscape proposals will not conflict with existing or proposed underground services

Reason: To ensure an appropriate standard of hard and soft landscaping and in the interests of visual amenity.

24. Any reserved matters application submitted in respect of layout and appearance shall include details of 5no. bat boxes and 5no. bird boxes (specifically Swift boxes), in accordance with the details contained in the approved Acer Ecology Bat Survey report revision 1.0 dated October 2015.

Reason: To ensure adequate provision for nesting bats and birds.

25. The ground floor Class A3 (Food & Drink) floorspace shall be used as a restaurant/café/coffee shop, and for no other purpose within Use Class A3 (Food & Drink).

Reason: To protect the amenities of adjacent occupiers.

26. No customers shall be admitted to or allowed to remain on the ground floor Class A3 (Food & Drink) premises between the hours of 22:00 and 08:00 on any day.

Reason: To ensure the amenities of adjacent occupiers are protected.

27. No customers shall be admitted to or allowed to remain on the ground floor Class A1 (Shops) premises between the hours of 22:30 and 07:30 on any day.

Reason: To ensure the amenities of adjacent occupiers are protected.

28. G7Q – Future Kitchen Extraction

29. Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (or any order revoking and re-enacting that Order with or without modification) no sale of hot food for consumption off the premises shall take place from the premises.

Reason: To ensure that the amenities of future occupiers are protected.

RECOMMENDATION 2: The highway works condition and any other works to the existing public highway (to be undertaken by the developer) are to be subject to an agreement under Section 278 Highways Act 1980 between the developer and Local Highway Authority.

RECOMMENDATION 3 : The contamination assessments and the effects of unstable land are considered on the basis of the best information available to the Planning Authority and are not necessarily exhaustive. The Authority takes due diligence when assessing these impacts, however you are minded that the responsibility for

- (i) determining the extent and effects of such constraints and;
- (ii) ensuring that any imported materials (including, topsoils, subsoils, aggregates and recycled or manufactured aggregates / soils) are chemically suitable for the proposed end use. Under no circumstances should controlled waste be imported. It is an offence under section 33 of the Environmental Protection Act 1990 to deposit controlled waste on a site which does not benefit from an appropriate waste management licence. The following must not be imported to a development site:
 - Unprocessed / unsorted demolition wastes.
 - Any materials originating from a site confirmed as being contaminated or potentially contaminated by chemical or radioactive substances.
 - Japanese Knotweed stems, leaves and rhizome infested soils. In addition to section 33 above, it is also an offence under the Wildlife and Countryside Act 1981 to spread this invasive weed; and
- (iii) the safe development and secure occupancy of the site rests with the developer.

Proposals for areas of possible land instability should take due account of the physical and chemical constraints and may include action on land reclamation or other remedial action to enable beneficial use of unstable land.

The Local Planning Authority has determined the application on the basis of the information available to it, but this does not mean that the land can be considered free from contamination.

RECOMMENDATION 4 : To protect the amenities of occupiers of other premises in the vicinity attention is drawn to the provisions of Section 60 of the Control of Pollution Act 1974 in relation to the control of noise from demolition and construction activities. Further to this the applicant is advised that no noise audible outside the site boundary adjacent to the curtilage of residential property shall be created by construction activities in respect of the implementation of this consent outside the hours of 0800-1800 hours Mondays to Fridays and 0800 - 1300 hours on Saturdays or at any time on Sunday or public holidays. The applicant is also advised to seek approval for any proposed piling operations.

RECOMMENDATION 5: The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com

RECOMMENDATION 6: Prior to the commencement of development, the developer shall notify the local planning authority of the commencement of development, and shall display a site notice and plan on, or near the site, in accordance with the requirements of Article 12 of the Town & Country Planning (Development Management Procedure)(Wales)(Amendment) Order 2016.

RECOMMENDATION 7: The developer is advised that bats often roost in houses and other buildings, and work on these buildings may disturb a bat roost. All bats and their roosts are protected against disturbance under UK and European legislation. If works are planned on a building in which bats are known to be roosting, Natural Resources Wales must be contacted for advice.

If work has already commenced and bats are found, or if any evidence that bats are using the site as a roost is found, work should cease and either NRW or a suitably qualified, experienced and licenced ecologist is consulted for advice on how to proceed.

Where there is a likelihood that bats are present, or where bats are found to be present, a suitably qualified and experienced ecological consultant should be contracted to provide an assessment of the impact of the proposed works, and undertake bat surveys if necessary.

Where bats or their roosts are present, no works of site clearance, demolition or construction should take place unless a licence to disturb these species and/or their roosts has been granted in accordance with the relevant legislation.

NRW can be contacted at:-

Natural Resources Wales, Tŷ Cambria, 29 Newport Road, Cardiff CF24 0TP, 0300 065 3000

Bat Conservation Trust can be contacted at:-

5th Floor, Quadrant House, 250 Kennington Lane, London, SE11 5DR, 0845 1300228

1. **DESCRIPTION OF PROPOSED DEVELOPMENT**

- 1.1 An amended outline application, with all matters reserved, for the demolition of an existing office block and redevelopment to provide student residential accommodation of 315 beds, laid out as individual studio rooms (reduced from 323no. beds).

The indicative plans show ground floor common room facilities, a 133sqm A3 (Food & Drink) unit, and a 135sqm A1 (Shops) unit.

- 1.2 The amended indicative plans show the development formed by three blocks (reduced from 4):

- Block 1 is to the eastern side of the site, fronting Trade Street and is shown stepping up from four storeys at the north-east corner of the site, to 8 storeys at the south-east corner (previously a constant 7 storey height);
- Block 2 is to the southern side of the site and is shown stepping up from two storey at the south-west corner of the site to 8 storeys at the south-east corner. The original submission showed the southern end of the site as being the open end of the horseshoe arrangement. The open end is now facing north;
- Block 3 is to the western side of the site and is shown as being 6 storeys high, with a smaller 2 storey element to the south-west corner;
- The originally indicated 'Block 4', a single storey amenity block has been removed from the proposals.

1.3 The three blocks enclose a grassed amenity area, and the site vehicle access/egress roadway runs around the perimeter of the site. To the outer side of the blocks, the perimeter road accommodates potential vehicle parking for 5 cars and cycle parking for 135 cycles. Rooftop amenity areas are shown on the fourth, fifth, sixth and seventh floors.

1.4 Although all matters are reserved, the submitted indicative elevation plans show a possible finish of multiple colour cladding/rainscreen frames and curtain walling, with glass balustrades to the rooftop terraces.

2. **DESCRIPTION OF SITE**

2.1 The site is approx. 0.36Ha in size and is located within Strategic Site A the Central Business Area (CBA) and Central Enterprise Zone (CEZ) of the adopted Cardiff Local Development Plan. The site is currently occupied by an office/industrial premises of 2 storey scale.

2.2 The site is bounded on all sides by the existing business/industry & warehousing premises & car parks, accessed off Trade Street and Curran Embankment

2.3 Approx 45-50m to the north along Trade Street lays a site currently under redevelopment to provide 100+ open market apartments (pp 16/00504/MJR).

3. **PLANNING HISTORY**

3.1 13/01146/DCI – Temporary change of use to D2 to allow use for gymnastics training - Approved

14/02275/MNR – Temporary change of use to D2 to allow use for gymnastics training – Approved

15/0205/MJR – Demolition of existing offices and redevelopment for student accommodation (tower block) - Withdrawn

4. **POLICY FRAMEWORK**

National policy

- 4.1 Planning Policy Wales (PPW) Edition 9, 2016 favours the sustainable re-use of previously developed land.
- 4.2 The following Technical Advice Notes (TANs) are relevant:
- TAN 12: Design
- 4.3 The following policies of the recently adopted 2016 City of Cardiff LDP are relevant to the consideration of this application:-
- KP2A Cardiff Central Enterprise Zone & Regional Transport Hub
 - KP5 Good Quality and Sustainable Design
 - KP6 New Infrastructure
 - KP7 Planning Obligations
 - H6 Change of Use or Redevelopment to Residential Use
 - C1 Community Facilities
 - C5 Provision for Open Space, Outdoor Recreation, Childrens' Play and Sport
 - EN12 Renewable Energy and Low Carbon Technologies
 - T1 Walking and Cycling
 - T5 Managing Transport Impacts
- 4.4 The following Supplementary Planning Guidance relates to the previous 1996 Local Plan. It is under review following the adoption of the LDP however it remains a material consideration in considering the application insofar as it is consistent with LDP policy:
- Community Facilities and Residential Development (2007)
 - Access, Circulation and Parking Requirements (2010)
- 4.5 In addition to the above, the following new Supplementary Planning Guidance is also relevant:
- Locating Waste Management Facilities Jan. 2017
 - Planning Obligations Jan. 2017
 - Infill Sites Nov. 2017
 - Green Infrastructure Nov. 2017

5. **INTERNAL CONSULTEE RESPONSES**

(Original Submission)

- 5.1 The Operational Manager Transportation has no objection to the proposals, subject to conditions and a financial contribution of **£197,433**, making the following comments:

The adopted Access, Circulation and Parking Standards SPG confirms that

up to one car parking space per 25 beds may be provided for operational use and that there is no requirement for on-site resident car parking for the sui generis use of student accommodation. There is also no minimum car parking requirement for the ancillary ground floor uses included in the application. In addition, established practice is that one cycle parking space be provided per two to three beds for the proposed type of development (between 108 and 162 for the proposed 323 beds).

Being mindful of the central, sustainable location of the site and that of the proposed use I am satisfied that the proposed development is compliant with adopted parking policy as submitted, with on-site service and operational parking provision only, and the provision of resident/visitor cycle parking as required by condition. It is also expected that active travel and demand for cycle parking will be monitored as part of the conditioned Travel Plan and provision of cycle parking enhanced as may be required to respond to any identified demand.

With reference to location and wider development considerations. It is noted that the site is in a city centre fringe location in the vicinity of Cardiff's main pedestrian shopping area, with direct access to employment, leisure, shopping, etc. opportunities and the main university campus/facilities to the north. The site is also within an area where walking, cycling and public transport offer viable daily alternatives to the use of a private car; having very good access to bus and rail based public transport services in and around Central Station, with access to both local and national rail and bus services. The site is therefore considered to be very sustainably located in broader transport terms and entirely appropriate for the proposed form of development.

It is nonetheless noted that the introduction of circa 323 residents (plus staff, visitors and customers) who will be wholly reliant on walking, cycling and public transport for daily journeys will put a not insignificant additional amount of non-motorised traffic onto the adjacent highway; where currently there is no footway on the development side of the road, the remaining surfacing is of poor quality and the area currently unlit. A financial contribution of **£145,400** is therefore sought for the reconstruction/resurfacing of Trade Street adjacent to the site, to include the provision of a 2 meter footway on the development side of the road, street lighting, lining/signing, Traffic Orders etc.

The above contribution is considered to satisfy the relevant planning requirements, being necessary to make the development acceptable as well as directly related to the form and scale of the proposed development. The contribution will be used in accordance with the above outline and, as well as facilitating access to the proposed development, when combined with a commensurate contribution received in relation to adjacent development will result in the comprehensive improvement of Trade Street throughout its length.

I am also satisfied, subject to agreement of the conditioned Traffic Management Plans, that there is sufficient capacity on the adjacent public

highway to accommodate the arrival and departure of students at the start and end term, and the daily servicing requirements of the proposed scheme. The Traffic Management plan will also assist with the control of student car parking within the site and surrounding area, where parking is currently fully controlled under the Central Parking Zone.

- 5.2 In addition to the above mentioned Highway improvement contribution, the OM Transportation has also provided the cost breakdown for the provision and ongoing (20 year) maintenance of a Council/Police controlled crime camera, having a total cost of **£52,033**.
- 5.3 The Pollution Control Manager (Noise & Air) has no objection, subject to a plant noise condition and noise advice.
- 5.4 The Pollution Control Manager (Contaminated Land) has no objection, subject to conditions in respect of contaminated land issues, with further contaminated land advice.
- 5.5 The Highways Drainage Manager has been consulted and no comments have been received.
- 5.6 The Air Quality Manager has no objection, subject to a dust suppression condition.
- 5.7 The Regeneration Manager has no objection, commenting that the proposed development of 323 bedroom student accommodation generates a requirement for a financial contribution of **£179,019.52** towards the provision or maintenance of community facilities in the vicinity of the site.
- 5.8 The Parks Manager has no objection, advising that whilst having regard for the open space provision on site, the scale of the proposed development generates a requirement for a financial contribution of **£176,529** towards the provision or maintenance of public open space in the vicinity of the site.
- 5.9 The Economic Development Manager has been consulted and no comments have been received.
- 5.10 The Council's Trees Officer comments that the submitted indicative landscape/tree planting arrangements require further consideration prior to any reserved matters submission so as not to result in any undue conflict with underground services on the site.
- 5.11 The Council's Ecologist has no objection, commenting that they agree with the provision of 5 bat boxes and 5 bird boxes and that the priority for the bird boxes is the Swift. Furthermore an additional recommendation in respect of appropriate action if nesting bats are encountered is requested.
- 5.12 The Neighbourhood Regeneration Manager (Access) has been consulted and no comments have been received.

- 5.13 The Housing Strategy Manager advises that as the development is wholly for student accommodation, no affordable housing contribution is required.
- 5.14 Following re-consultation in light of the amended submission, the following comments are made:
- 5.15 The Regeneration Manager advises that the reduction in rooms results in a revised financial contribution request of **£174,585.60**.
- 5.16 The Parks Manager advises that the reduction in rooms results in a revised financial contribution request of **£172,156**.
- 5.17 The Operational Manager Transportation advises that he has no further comment to add in light of the amended indicative plans and that the requested financial contribution remains as originally indicated.

6. **EXTERNAL CONSULTEE RESPONSES**

- 6.1 Welsh Water have no objection subject to a drainage condition.
- 6.2 Natural Resources Wales have no objection, subject to conditions relating to the control of potential contamination of controlled waters.
- 6.3 South Wales Police object to the proposals as the site is within an area where there are instances of crime and anti-social behaviour and the Police consider students to be a 'vulnerable' group. The following comments have been received:

Thank you for your consultation in respect of the above and I comment as follows on behalf of South Wales Police. South Wales Police have had a meeting with developers in respect of the proposed development and discussed problems that exist in the area.

Background

Trade Street is an area of Cardiff which contains predominately commercial and industrial premises and has very few habitable properties, there is a new apartment block under construction opposite Trade Street Lane to the north of the proposed site and which will offer only limited surveillance of Trade Street. The infrastructure of the area is not well developed for residential use, lighting is poor and there are numerous dark hiding places provided by other existing properties which are located in Trade Street. Trade Street has therefore attracted unwelcome activities which bring with them certain local risks. There have been reported incidents of burglary, theft, robbery, prostitution and vagrancy but it is felt that reported incidents represent only a fraction of the activities that take place because of the above environmental factors.

Students can be a vulnerable group in our society, often young, often away from home for the first time and a significant proportion are lone females.

Many students are from overseas and will have no idea or perceptions of local risks; as such particular care needs to be taken with siting of student accommodation and measures put in place to ensure adequate safety and security for students.

While creating a more diverse mix of developments in the area of Trade Street would in the long term help regenerate the area, the placing of accommodation for a vulnerable group such as students in area that has significant social and crime issues would create significant risk without similar investment in measures to reduce the likelihood of crime and disorder. South Wales Police are opposed to the idea of student accommodation being used as the spearhead for development in a high risk area.

South Wales Police welcome redevelopment but would recommend that student accommodation is located only in established communities where high levels of safety and security can be achieved. Having meet with developers and discussed the problems that exist in the area, South Wales Police feel that the applicant has failed to acknowledge or sufficiently address the community safety issues.

South Wales Police would wish to object to the proposed development on the following grounds of crime and disorder and community safety issues.

- 1 The existing infrastructure of the area is very poor to support any large scale student residential accommodation, street lighting is poor, and there is no public CCTV system, the area is currently basically commercial and industrial.*
- 2 At present there are currently very few if any residents in Trade Street who could function as capable guardians although there is a development in progress to provide /flats opposite the entrance to Trade Street lane this will provide only limited surveillance of Trade Street and not of some of key problem areas. The proposed addition of students who are a transient population is likely to provide less effective capable guardianship, compared to more long term resident populations, the reason being that longer term residents tend to have more knowledge and greater connection with the area and therefore more interest in what goes on. Any student accommodation should either be within established communities or secure managed sites. In the current application the development would be be isolated from other residential developments being located further into area where problems are occurring, the student accommodation could be described as spearheading the re -development into the former industrial area. Given that students can be considered as vulnerable groups in terms of age, gender, inexperience and awareness (many will be foreign) locating such accommodation in Trade Street will mix this vulnerability with risk which is known from evidence of activities in the area.*

- 3 *Active surveillance is best provided by capable guardians, the lack of capable guardianship in Trade Street and the adjoining Trade Street Lane, particularly after dark is a major obstacle in improving safety in the area. For effective capable guardianship to function there has to be right environmental factors, Trade Street and Trade Street Lane has poor lighting, this would make it difficult for people to observe issues after dark, the position of the nearby residential development which is under construction is that it will provide only limited surveillance activity, which will not extend as far as the proposed student accommodation. Active communities take time to form and the fact that this will be a new development will mean, that any active guardianship will take time to develop. Current hiding places in Trade Street in Coopers Yard and Trade Street Lane are areas of significant illicit activities and unlikely to be affected any new residential development unless there is also wider environmental improvements.*
- 4 *Community pressures in other residential areas nearby have displaced prostitution to quieter commercial / industrial areas of the City such as Trade Street. While official figures would indicate only two arrests for Prostitution took place in Trade Street by Police (2015/2016) evidence from an early morning site visit by Design out Crime Officers of South Wales Police (21/6/17), indicated that there is a serious problem in terms of illicit sexual activities (prostitution) and drug abuse. This evidence included an empty needle packet on the road outside Suffolk House the proposed site. In Coopers Yard which is mixed site of various offices directly opposite the proposed development an abundance of evidence of damage, recent drug paraphernalia in large quantities (including 10 discarded needles and 39 empty glass phials used for injecting), human excrement, and recent fire damage was found (Photographic evidence available).*
- 5 *The area is a known pick up point for prostitutes and is regularly attended by the Safer Wales - Street Life Team who provide support, advice and help to sex workers in the area. Evidence of this was clear from numerous used condoms found in both Coopers Yard and Trade Street Lane indicative of sexual activity had been taking place in an open place (photographic evidence available). This was further supported by observations of office staff and a tradesman who worked in Coopers Yard and said they had observed prostitutes providing sexual services to clients in the daytime.*
- 6 *Crime prevention operations have identified that some of the people frequenting areas of the city to pick up prostitutes have histories of violence against women.*
- 7 *The main homeless centres for Cardiff are located not far from the proposed location and are often full and as such a number of homeless people / addicts sleep rough in nearby premises such as Coopers Yard on Trade Street. Often needles and evidence of drug and alcohol abuse are found by patrolling officers and council staff. The evidence of*

damage and fires is worrying as it suggests a lack of effective control and security in the area.

- 8 *A tradesman who regularly works in Trade Street in the evenings indicated to police staff that he frequently confronts prostitutes with clients and drug abusers and feels intimidated it would be far more intimidating for potentially young persons (lone females) be confronted by such behaviour.*
- 9 *A number of serious incidents have occurred in Grangetown/ Butetown area including a murder and attempted murder a very short distance from the proposed location which have led to community tension. The proposal to site student accommodation in Trade Street, without the area being properly re-developed and establishing a functioning community would lead to students being placed at risk given the current environmental and social issues in the area.*
- 10 *In terms of design and layout issues, more detail needs to be provided on Security and Safety issues. It is noted that that the application states that some student's clusters/pods will have up to ten rooms per cluster, the maximum advised by Secured by Design is 8. More detailed information is required on physical security, access control, CCTV, management and fire safety (adequate prevention, warning, and evacuation measures) also there needs to be a clearer indication that any proposal will comply with Secured by Design standards to ensure that design and build delivers safe and secure accommodation.*
- 11 *Given that the applicant has been made aware of the community safety issues in Trade Street the application fails to adequately recognise the challenges or put forward solutions.*

While South Wales Police are happy to engage with developers to try and address community safety and security issues, many of the issues remain outside the developers or wider local authority control. Without addressing the above situational and social issues in Trade Street it is difficult to see how potential risks to students could be reduced.

Should the council be mindful to grant permission for the proposed development South Wales Police would request the following conditions are put in place?

- 1 *The proposed development is built to Secured by Design standards and all Police recommendations are put into place, **reason** to ensure safety and security at student residence.*
- 2 *A scheme of work be submitted to the council undertaking to improve lighting to Trade Street and adjoining streets, **reason** to enhance person safety.*

- 3 *A suitable scheme of work is submitted to extend the public CCTV system into Trade Street and adjoining Streets to provide improved surveillance, **reason** to improve safety and prevent crime in the area.*
- 4 *An effective management plan is submitted for the proposed development which clearly demonstrates how safety and security will be maintained, **reason** to provide safety and security at student accommodation.*
- 5 *A scheme of work is submitted to council on how various environmental issues such as hiding places in adjoining premises which encourages anti-social behaviour and poses a risk to personal safety could be satisfactorily addressed. **Reason** to ensure the area is safe enough to provide residential accommodation.*

For further information on Secured by Design standards please visit the website www.securedbydesign.com

In conclusion South Wales Police welcome the opportunity that urban re-development affords to improve both the safety, security and sustainability for communities and have had positive engagement with the developments of other student accommodation in Cardiff to ensure that such accommodation affords students appropriate levels of safety and security. However, in order to achieve the above, the proposed development must take account of environmental context of the location and seek to address any issues. The wider re -development and improvement of the Trade Street would do much to improve community safety issues in the area, but this needs to be in place prior to not after provision of student accommodation in order to establish a functioning community and appropriate levels of guardianship.

- 6.4 Further to the above, additional information in respect of points 1-5 above (should the Council be mindful to grant consent), was submitted by the agent on 14 November and the Police were re-consulted. The following additional comments have been received:

Thank you for the additional information which has been provided by the developer, SWP welcome the details on building security and management and proposal to improve lighting in Trade Street. But item 1.5 suggests that this addresses police concerns in relation to access to the site, police concerns remain as previously stated that the area remains unsuitable for student accommodation.

- 6.5 South Wales Police were re-consulted in light of the amended submission and the following comments have been received:

Thank you for forwarding details just a few additional comments,

1 Would appreciate developers providing more information on both type of access control system and levels of access control (reception/floor/apartment room etc). Reason to ensure adequate safety and security.

2 It is noted that on some floors up to 57 apartments flow off one continual corridor and share a communal recreation area. Such a layout could be difficult to manage and will not encourage self- control or self –policing by occupants. Secured by Design (SBD) that student accommodation are contained in clusters or cells of a maximum of no more than 8 to encourage self -policing and sense of ownership by occupants. Reason to assist in effective management.

3 Could it be clarified that all rooms have self- contained cooking facilities. If this is the case any fire risk assessment needs to include this and ensure that there are adequate methods of fire prevention, detection and evacuation in place. Reason to protect life.

4 The proposed office next too the foyer or entrance area could include a window to improve surveillance of people entering or leaving. Reason to improve security.

5 Currently only open racks/ posts are provided for bicycle storage within the site and some are on view to public areas. A secure bi-cycle storage area should be provided which restricts access only to persons who own bi-cycles . Reason to provide adequate Security of bicycles.

6 It is recommended specific scheme of work needs to be submitted with further details of onsite CCTV for approval by the authority. Reason to ensure adequate coverage and system is of evidential quality so it can enhance the management of safety and security on site.

South Wales Police are happy to work with developers to achieve high levels of security and safety and would recommend building complies with SBD standards.

7. REPRESENTATIONS

7.1 Local Members were consulted and no comments have been received..

7.2 Adjacent occupiers were notified and no comments have been received.

7.3 The application was publicised as a Major development by way of site and press notice. No comments have been received.

7.4 Local Members have been re-consulted in light of the amended plans and any comments will be reported to Committee.

8. ANALYSIS

8.1 The amended proposal is for the demolition of existing Class B1/B8 (office/warehouse) floorspace at Suffolk House, Trade Street (2768sqm) and the development of a student accommodation scheme comprising 315 rooms, with retail (Class A1 – 135sqm) and food & drink (Class A3 – 133sqm) units to

the Trade Street frontage. The site is located within the Central Business Area (CBA) and Central Enterprise Zone (CEZ) of the adopted Cardiff Local Development Plan.

8.2 In terms land use policy, the nature of development and the current status of the land is considered as follows:

1. Whether the proposed student accommodation (sui generis) use is acceptable at this location.

The application site is located within the boundary of LDP Policy KP2A (Central Enterprise Zone and Regional Transport Hub – Strategic Site), which is allocated for major employment led initiatives, focussing on financial and business services, together with other mixed uses. The schematic framework for Strategic Site A identifies the site as a location for mixed uses within the CEZ.

Policy H6 of the LDP (change of use or redevelopment to residential use) identifies criteria against which the change of use of previously developed land will be considered, including whether there is an overriding need to retain the existing use of the land and whether necessary community and transportation facilities are accessible or can be readily provided. The Dumballs Road area contains a number of low-density, land-hungry warehouse / industrial uses with much of the site being largely under-utilised, having regard to its strategic city centre location. The applicant has identified in their planning statement that, despite the premises having been actively marketed for Class B (office / warehouse) uses, in recent years the buildings have been in temporary use for gymnastics training purposes (Class D2).

The principle of residential development is well established within the wider Dumballs Road area and the site is well served by transport links and is close to local amenities. In addition, the proposal incorporates two commercial units at the ground floor of the building, which will create active uses along the Trade Street frontage of the development and is consistent with the wider master planning principles for the area.

2. The acceptability of a Class A1 (Shop) use at this location.

As the site is located outside the Central Shopping Area (CSA) of the City Centre and also falls outside of any designated District / Local Centres as identified within the Local Development Plan, any proposal for a Class A1 (shop) use at this location would have to satisfy the three tests of out-of-centre retail policy. In this regard and given the relatively small scale of the proposed unit (135sqm), an element of convenience retail could be considered acceptable to serve the newly established population and the wider residential community within the surrounding area.

3. Whether the proposed A3 (Food and Drink) use is acceptable at this location.

Policy R8 (Food and Drink Uses) of the LDP identifies the Central Business Area as an appropriate location for food and drink uses, subject to amenity considerations.

Given that the application proposes 315 flats to the upper floors, the applicant would be expected to demonstrate how their proposal can address concerns over the potential impact of a ground floor A3 use upon the amenity of residential occupiers. This can be achieved through the applicant accepting a restricted use condition, limiting any use to a café / snack bar / restaurant where their primary function is the sale and consumption of food on the premises rather than a 'bar' use or hot food takeaway, in order to safeguard residential amenity.

- 8.4 Whilst it is noted that this is an outline application, with all matters reserved, sufficient information has been submitted to allow the Local Planning Authority arrive at an informed opinion that the scale and massing principles of the development are acceptable.

The site is located in an area currently dominated by 2-3 storey (commercial scale) industrial and office buildings. However, approx. 45m to the north, along Trade Street, there is currently a residential development of 100+ flats taking place. This development (approved under application 16/00504/MJR) has a massing ranging from 6 to 9 storeys, with the 6 storey southern elevation facing onto Coopers Yard.

At four to eight storeys high, the eastern block, which fronts Trade Street and also overlooks Coopers Yard, is considered to be an acceptable scale, having no adverse impact on the amenities of any adjacent occupiers.

At 8 to 2 storey height, the southern block sits behind the eastern block and runs along the southern boundary, overlooking a surface car park serving nearby commercial units. It is considered that the scale and massing of this block would not have any significant impact on the amenities of adjacent occupiers.

At 6 storey height, the western block has been moved further off the boundary. The original submission showed this block being sited approx. 4.2m – 9.6m off the western site boundary. The amended indicative plans show the 6 storey block as approx. 13.8m off this boundary. The increased degree of separation is considered to mitigate the scale when considering the impact on the adjacent office accommodation.

A two storey 'annexe' element to the south-west corner is approx. 7.8m off the boundary. Given the existing built form in this location, it is considered that the proposed 'annexe' element would not cause any unacceptable harm to adjacent occupiers.

Access to and egress from the site (for vehicles) is reflective of the current situation, with vehicle gates currently located at the northern and southern corners of the site, fronting Trade Street.

- 8.5 With regard to the matters raised in objection by South Wales Police, the Local planning Authority has sought further information from the applicant in order to address the matters contained in the Police representation “*Should the Council be mindful to grant permission...*”.

The following information has been submitted as an addendum to the applicant’s Planning Statement:

Secure by Design

1.2 The proposed development has been reviewed by the crime prevention design advisor and the following recommendations will be incorporated into the proposed development at the reserve matter stage:

1.2.1 Building Security

- The development will be designed to protect property by allowing for natural surveillance.
- Ground floor windows and external doors will be in accordance with PAS24 2012 and all curtain wall fittings must comply with PAS24.
- Security glass will be specified to all windows: this removes the ability to remove the glass from the frame.
- Unrestricted access will not be possible from ground floor retail to student accommodation.

1.2.2 Management

- As part of the management strategy for the building, a 24hr Management team will be in place to ensure a secure and safe environment is maintained for the Students.
- The reception and office located with the Main Entrance will control access of the Students by Key fob access.
- Two persons will be employed at these offices (typical 9am to 5pm) and there will be one security person based at this building at any one time.
- A specific management strategy will be put in place with regards to premises management which details staffing levels, monitoring capability and how issues will be responded too and managed on site.

1.2.3 CCTV

- CCTV will be installed throughout the building in key areas such as the Main Entrance/Reception, Carpark Entrance, Lift & Stair Lobbies, Lift Cars, Communal Areas including Gym, External/roof top gardens, all linked back to monitors within the Office/Reception.
- CCTV cameras will be to the standard of recognition so all images can be made out and used in a court case.

- All CCTV cameras will be protected against vandalism by being positioned in elevated positions.
- Under data protection, CCTV will be clearly signed internally and externally and labelled with the name of the provider and a number to contact.

1.2.4 Lighting

- Proposed new lighting will protect the whole outside of the building, and vehicle/cycling parking areas. All fittings will be vandal resistant and positioned in elevated positions.
- The lighting will be controlled by photo electric cells and complements and enhances the CCTV coverage on site.

1.2.5 Landscaping

- New trees will be sited in locations that do not interfere with CCTV and lighting, and do not provide an assist to climbing.

1.2.6 Perimeter Security

- The site will be secured by a 2.4m High 'V' Mesh Security Fencing which will be located to the North, East and Southern boundaries. It will be sited on a hard surface or embedded in the ground to prevent persons from getting underneath the fence. This will promote visibility.
- Proposed gates will be of the same height and specification as the fencing/railings.

1.2.7 Waste and Cycle Storage

- The proposed cycle stores will include secure 'Cyclepods Canterbury Bike Compounds'. The storage area will be overlooked from the student rooms and will be served by lighting and CCTV.
- The proposed Waste Storage area will be kept inside a secure, externally accessed store in the main building. The storage area will be overlooked from the student rooms and will be served by lighting and CCTV.

As stated in para. 6.4 above, whilst the Police maintain their position in respect of the suitability of this area for student occupation, they welcome the above mentioned commitments from the applicant.

8.6 In addition to the above, the applicant has also agreed to additional security measures to be incorporated into a Highways Improvement scheme, insofar as an additional 3 street lights and a Cardiff Council/South Wales Police monitored Crime Camera are to be installed on Trade Street (position yet to be determined).

8.7 It is also of note that in addition to these physical measures to be implemented by the applicant/developer, there is a considerable passive surveillance enhancement of the area with the occupation of the large scale

residential development to the north of the site, with upwards of 65 windows and rooftop terraces directly overlooking the Coopers Yard area.

- 8.8 Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. This duty has been considered in the evaluation of this application.

Whilst the position of South Wales Police in respect of their assessment of Student vulnerability is noted, it is considered that there would be insufficient grounds to refuse planning permission in this respect, having due regard for the above mentioned measures, and the short and long term developments in the area that are under way and that are likely to come forward.

9. **OTHER CONSIDERATIONS**

- 9.1 *Equality Act 2010* – The Equality Act 2010 identifies a number of ‘protected characteristics’, namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The Council’s duty under the above Act has been given due consideration in the determination of this application. It is considered that the proposed development does not have any significant implications for, or effect on, persons who share a protected characteristic.

- 9.2 *Well-Being of Future Generations Act 2016* – Section 3 of this Act imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principle to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs (Section 5). This duty has been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable impact upon the achievement of wellbeing objectives as a result of the recommended decision.

10. **PLANNING OBLIGATIONS**

- 10.1 The following contribution requests have been made, with reference made to the Community Infrastructure Levy tests (and having regard for the amended submission):

Parks – A contribution of £172,156 is requested towards the maintenance/provision of open space in the vicinity of the site.

Regeneration – A contribution of £174,585.60 is requested towards the provision/maintenance of community facilities in the vicinity of the site.

Transportation – A contribution of £197,433 is requested, towards the improvement of the Trade Street frontage to the site. The contribution is to fund physical improvements to the foot/carriageway, 3 street lights and a crime camera.

In addition to the above, it is recommended that future occupancy by students only is secured through any legal agreement made.

The agent has confirmed that the above mentioned contributions are acceptable to the applicant.

11. **CONCLUSION**

- 11.1 In light of the above, and having regard for adopted planning policy and approved guidance, it is recommended that planning permission be granted, subject to conditions and a Legal Agreement.

12. **COMMITTEE RESOLUTION**

- 12.1 Should Members be minded to refuse planning permission, in accordance with the resolution of the 13th December 2017, the following are offered as possible reasons:

1. *The proposal by reason of the indicated scale and massing principles represents an over-development of the site which fails to respond appropriately to local character and context, causing unacceptable harm to the amenity of the area, contrary to the provisions of policy KP5(i) and KP5(x) of the adopted Cardiff Local Development Plan 2016.*
2. *The proposal is considered to be prejudicial to the future development of adjoining land to the west, contrary to policy KP4 of the adopted Cardiff Local Development Plan 2016.*

APPENDIX 1

REPORT TO PLANNING COMMITTEE 13 DECEMBER 2017

COMMITTEE DATE: 13/12/2017

APPLICATION No. **17/01292/MJR** APPLICATION DATE: 06/06/2017

ED: **BUTETOWN**

APP: TYPE: Full Planning Permission

APPLICANT: Dovey Estates.

LOCATION: LAND AT SUFFOLK HOUSE, TRADE STREET, BUTETOWN,
CARDIFF, CF10 5DT

PROPOSAL: OUTLINE PLANNING PERMISSION FOR THE DEMOLITION
OF EXISTING BUILDINGS AND REDEVELOPMENT OF THE
SITE FOR NEW STUDENT RESIDENTIAL ACCOMMODATION

RECOMMENDATION 1 : That, subject to relevant parties entering into a binding planning obligation in agreement with the Council under **SECTION 106** of the Town and Country Planning Act 1990, within 6 months of the date of this resolution unless otherwise agreed by the Council in writing, in respect of matters detailed in paragraph 10.1 of this report, planning permission be **GRANTED** subject to the following conditions:

1. C00 Standard Outline
2. The consent relates to the following approved plans and documents:

Plans

O.S. Site Location Plan

1BR dated 11/11/17

5 dated 17/6/17

6 dated 17/6/17

7 dated 17/6/17

2

3

4

12 dated 27/4/17

S.7591-SK01

20883-1

20883-2

Ground Floor

Floor Plans 1st, 2nd & 3rd

Floor Plans 4th, 5th & 6th

Floor Plan 7th

East & South Elevation

West & North Elevation

East & West Sections

Block 4

Proposed Drainage Strategy

Site Survey

Site Survey

Documents

Asbri Planning Statement	March 2017
Asbri Design & Access Statement	March 2017
Asbri Pre-Application Consultation Report	June 2017
Smart Associates Drainage Strategy ref: S.7591	March 2017
Asbri Drainage E-mail	07 Nov 2017
JBA Consulting Flood Consequences Assessment	May 2017
Acer Ecology Bat Report	Oct 2015
Dusk to Dawn Ecology Bat Report	June 2017
Asbri Travel Plan	March 2017
Asbri Transport Statement	March 2017
Terra Firma Site Investigation	April 2017
C2J Planning Statement Additional Information	27 Nov 2017

Images

8 (Scheme 6)	Trade Street view
9 (Scheme 6)	Courtyard view

Reason: for the avoidance of doubt.

3. Unless otherwise agreed in writing by the local planning authority, the development shall accord with the general layout scale and massing principles as set out in the approved indicative plans.

Reason. To ensure that the development accords with the principles of the approved indicative plans and in the interests of visual amenity.

4. Prior to the commencement of any development works a scheme to investigate and monitor the site for the presence of gases* being generated at the site or land adjoining thereto, including a plan of the area to be monitored, shall be submitted to the Local Planning Authority for its approval.

Following completion of the approved monitoring scheme, the proposed details of appropriate gas protection measures to ensure the safe and inoffensive dispersal or management of gases and to prevent lateral migration of gases into or from land surrounding the application site shall be submitted to and approved in writing to the LPA. If no protection measures are required than no further actions will be required.

All required gas protection measures shall be installed and appropriately verified before occupation of any part of the development which has been permitted and the approved protection measures shall be retained and maintained until such time as the Local Planning Authority agrees in writing that the measures are no longer required.

* 'Gases' include landfill gases, vapours from contaminated land sites, and naturally occurring methane and carbon dioxide, but does not

include radon gas. Gas Monitoring programmes should be designed in line with current best practice as detailed in CIRIA 665 and or BS8485 year 2007 Code of Practice for the Characterization and Remediation from Ground Gas in Affected Developments,.

Reason: To ensure that the safety of future occupiers is not prejudiced in accordance with policy EN13 of the Cardiff Local Development Plan.

5. Prior to the commencement of the development an assessment of the nature and extent of contamination shall be submitted to and approved in writing by the Local Planning Authority. This assessment must be carried out by or under the direction of a suitably qualified competent person * in accordance with BS10175 (2011) Code of Practice for the Investigation of Potentially Contaminated Sites and shall assess any contamination on the site, whether or not it originates on the site. The report of the findings shall include:

- (i) a desk top study to identify all previous uses at the site and potential contaminants associated with those uses and the impacts from those contaminants on land and controlled waters. The desk study shall establish a 'conceptual site model' (CSM) which identifies and assesses all identified potential source, pathway, and receptor linkages;
- (ii) an intrusive investigation to assess the extent, scale and nature of contamination which may be present, if identified as required by the desk top study;
- (iii) an assessment of the potential risks to:
 - human health,
 - groundwaters and surface waters
 - adjoining land,
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - ecological systems,
 - archaeological sites and ancient monuments; and
 - any other receptors identified at (i)
- (iv) an appraisal of remedial options, and justification for the preferred remedial option(s).

All work and submissions carried out for the purposes of this condition must be conducted in accordance with DEFRA and the Environment Agency's 'Model procedures for the Management of Land Contamination, CLR 11' (September 2004) and the WLGA / WAG / EA guidance document ' Land Contamination: A guide for Developers' (2012), unless the Local Planning Authority agrees to any variation.

* A 'suitably qualified competent person' would normally be expected to be a chartered member of an appropriate professional body (such as

the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

Reason: To ensure that information provided for the assessment of the risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems is sufficient to enable a proper assessment in accordance with policy EN13 of the Cardiff Local Development Plan.

6. Prior to the commencement of the development a detailed remediation scheme and verification plan to bring the site to a condition suitable for the intended use by removing any unacceptable risks to human health, controlled waters, buildings, other property and the natural and historical environment, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include all works to be undertaken, proposed remediation objectives and remediation criteria, a timetable of works and site management procedures.

Reason: To ensure that any unacceptable risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

7. The remediation scheme as approved by the LPA must be fully undertaken in accordance with its terms prior to the occupation of any part of the development unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works. Within 6 months of the completion of the measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that any unacceptable risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

8. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing within 2 days to the Local Planning Authority, all associated works must stop, and no further development shall take place unless otherwise agreed in writing until a scheme to deal with the contamination found has been approved. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme and verification plan must be prepared and submitted to and approved in writing by the Local Planning Authority. Following completion of measures identified in the approved

remediation scheme a verification report must be submitted to and approved in writing by the Local Planning Authority. The timescale for the above actions shall be agreed with the LPA within 2 weeks of the discovery of any unsuspected contamination.

Reason: To ensure that any unacceptable risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems are minimised.

9. Any topsoil [natural or manufactured], or subsoil, to be imported shall be assessed for chemical or other potential contaminants in accordance with a scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority in advance of its importation. Only material approved by the Local Planning Authority shall be imported. All measures specified in the approved scheme shall be undertaken in accordance with the relevant Code of Practice and Guidance Notes. Subject to approval of the above, sampling of the material received at the development site to verify that the imported soil is free from contamination shall be undertaken in accordance with a scheme and timescale to be agreed in writing by the LPA.

Reason: To ensure that the safety of future occupiers is not prejudiced.

10. Any aggregate (other than virgin quarry stone) or recycled aggregate material to be imported shall be assessed for chemical or other potential contaminants in accordance with a scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority in advance of its importation. Only material approved by the Local Planning Authority shall be imported. All measures specified in the approved scheme shall be undertaken in accordance with Pollution Control's Imported Materials Guidance Notes. Subject to approval of the above, sampling of the material received at the development site to verify that the imported soil is free from contamination shall be undertaken in accordance with a scheme and timescale to be agreed in writing by the LPA.

Reason: To ensure that the safety of future occupiers is not prejudiced.

11. Any site won recycled aggregate materials shall be assessed for chemical or other potential contaminants in accordance with a scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority in advance of its reuse. Only material approved by the Local Planning Authority shall be reused.

Reason: To ensure that the safety of future occupiers is not prejudiced.

12. No building shall be occupied until the drainage system for the site, as shown on plan no. S.7591-SK01 has been constructed, in accordance with the approved details. No work shall be undertaken on the brickwork public combined sewer in Trade Street and surface water flows from the development shall communicate indirectly to the public sewer through an attenuation device that discharges at a rate not exceeding 5l/s.

Reason: To prevent hydraulic overloading of the public sewerage

system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

13. In respect of the potential impact of contamination of controlled waters, reports on monitoring, maintenance and any contingency action carried out in accordance with a long-term monitoring and maintenance plan shall be submitted to the Local Planning Authority as set out in that plan. On completion of the monitoring programme a final report demonstrating that all long-term site remediation criteria have been met and documenting the decision to cease monitoring shall be submitted to and approved in writing by the Local Planning Authority.
Reason: To ensure that longer term remediation criteria relating to controlled waters have been met and that there are no unacceptable risks to controlled waters following remediation of the site.
14. No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

The applicant is referred to the SuDs Manual (CIRCA C697, 2007) the Sustrans website <http://www.sustrans.org>, and draft National Standards for SuDs (Defra, 2011) for further information.

Reason: There is an increased potential for pollution of controlled waters from inappropriately located infiltration systems such as soakaways, unsealed porous pavement systems or infiltration basins.

15. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.
Reason: There is an increased potential for pollution of controlled waters from inappropriate methods of piling.
16. Prior to implementation a noise assessment shall be carried out and submitted to the Local Planning Authority to ensure the noise emitted from fixed plant and equipment on and around the site achieves a rating noise level of background -10dB at the nearest noise sensitive premises when measured and corrected in accordance with BS 4142: 2014 (or any British Standard amending or superseding that standard).

In addition the noise assessment must also take into consideration a scheme of sound insulation to protect the residents from the developments ground floor retail units, and TAN11 to assess noise from mixed sources.

Reason: To ensure that the amenities of occupiers of other premises in the vicinity are protected, in accordance with policy 2.24 of the deposit Unitary Development Plan.

17. Prior to completion of the development a scheme (Construction Environmental Management Plan) to minimise dust emissions arising from demolition and construction activities on site shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of dust suppression measures and the methods to monitor emissions of dust arising from the development. The construction phase shall be implemented in accordance with the approved scheme, with the approved dust suppression measures being maintained in a fully functional condition for the duration of the construction phase.

Reason: To assess air quality and agree any mitigation measures that may be required to safeguard the amenity of nearby residents in the area.

18. Notwithstanding the submitted plans, prior to any above ground development, details of the facilities for refuse storage, which shall have regard to the information contained in the email to the agent dated 07 July 2017, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. The facilities shall be provided prior to the beneficial occupation of the development and shall thereafter be retained and maintained.

Reason. To ensure an orderly form of development and to protect the amenities of the area.

19. Notwithstanding the approved plans, no above-ground development shall take place until details of the undercover and secure cycle parking facilities for 130 cycles has been submitted to and approved in writing by the Local Planning Authority and the development shall not be brought into beneficial use until the approved scheme is implemented.

Reason: To ensure that adequate provision is made for the secure parking of cycles.

20. No part of the development hereby permitted shall be occupied until a travel/parking/traffic/resident/letting management plan to include, but not limited to, the promotion of walking, cycling, public transport and other alternatives to the ownership and use of the private car; the management of student drop-off and collection/traffic at the start and end of term; the control of vehicular access to the site and the exclusion, and control of student resident car parking within the site and surrounding area, has been submitted to and approved by the Local Planning Authority.

Reason: in the interest of highway safety and to regulate the impact of the development on use of the adjacent highway.

21. No part of the development hereby permitted shall be commenced until

a scheme of construction management has been submitted to and approved by the Local Planning Authority, to include as required but not limited to details of site hoardings, site access and wheel washing facilities. Construction of the development shall be managed strictly in accordance with the scheme so approved.

Reason: In the interests of highway safety and public amenity.

22. Any reserved matters application submitted in respect of site layout and building appearance shall include full details of site security measures including (but not limited to) on-site external lighting, on site CCTV (including arcs of camera coverage outside the site perimeter), details of monitoring the CCTV feeds and manned on-site security, and door/gate entry systems. The details shall be in accordance with the security measures indicated in the approved documents and shall be implemented prior to the beneficial occupation of the development and thereafter retained and maintained.

Reason. To make appropriate provision for the safety and security of future occupiers, in the interests of crime prevention.

23. Any reserved matters application submitted in respect of landscaping shall include (but not be limited to) the following elements:

- A scaled planting plan
- A Plant schedule
- Topsoil and subsoil specification
- A tree pit plan and sectional views for hard and soft landscaped areas
- A planting and aftercare methodology
- Confirmation that the landscape proposals will not conflict with existing or proposed underground services

Reason: To ensure an appropriate standard of hard and soft landscaping and in the interests of visual amenity.

24. Any reserved matters application submitted in respect of layout and appearance shall include details of 5no. bat boxes and 5no. bird boxes (specifically Swift boxes), in accordance with the details contained in the approved Acer Ecology Bat Survey report revision 1.0 dated October 2015.

Reason: To ensure adequate provision for nesting bats and birds.

25. The ground floor Class A3 (Food & Drink) floorspace shall be used as a restaurant/café/coffee shop, and for no other purpose within Use Class A3 (Food & Drink).

Reason: To protect the amenities of adjacent occupiers.

26. No customers shall be admitted to or allowed to remain on the ground floor Class A3 (Food & Drink) premises between the hours of 22:00 and 08:00 on any day.

Reason: To ensure the amenities of adjacent occupiers are protected.

27. No customers shall be admitted to or allowed to remain on the ground floor Class A1 (Shops) premises between the hours of 22:30 and 07:30 on any day.
Reason: To ensure the amenities of adjacent occupiers are protected.
28. G7Q – Future Kitchen Extraction
29. Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (or any order revoking and re-enacting that Order with or without modification) no sale of hot food for consumption off the premises shall take place from the premises.
Reason: To ensure that the amenities of future occupiers are protected.

RECOMMENDATION 2 : The highway works condition and any other works to the existing public highway (to be undertaken by the developer) are to be subject to an agreement under Section 278 Highways Act 1980 between the developer and Local Highway Authority.

RECOMMENDATION 3 : The contamination assessments and the effects of unstable land are considered on the basis of the best information available to the Planning Authority and are not necessarily exhaustive. The Authority takes due diligence when assessing these impacts, however you are minded that the responsibility for

- (i) determining the extent and effects of such constraints and;
- (ii) ensuring that any imported materials (including, topsoils, subsoils, aggregates and recycled or manufactured aggregates / soils) are chemically suitable for the proposed end use. Under no circumstances should controlled waste be imported. It is an offence under section 33 of the environmental Protection Act 1990 to deposit controlled waste on a site which does not benefit from an appropriate waste management license. The following must not be imported to a development site:
 - Unprocessed / unsorted demolition wastes.
 - Any materials originating from a site confirmed as being contaminated or potentially contaminated by chemical or radioactive substances.
 - Japanese Knotweed stems, leaves and rhizome infested soils. In addition to section 33 above, it is also an offence under the Wildlife and Countryside Act 1981 to spread this invasive weed; and
- (iii) the safe development and secure occupancy of the site rests with the developer.

Proposals for areas of possible land instability should take due account of the physical and chemical constraints and may include action on land reclamation or other remedial action to enable beneficial use of unstable land.

The Local Planning Authority has determined the application on the basis of the information available to it, but this does not mean that the land can be considered free from contamination.

RECOMMENDATION 4 : To protect the amenities of occupiers of other premises in the vicinity attention is drawn to the provisions of Section 60 of the Control of Pollution Act 1974 in relation to the control of noise from demolition and construction activities. Further to this the applicant is advised that no noise audible outside the site boundary adjacent to the curtilage of residential property shall be created by construction activities in respect of the implementation of this consent outside the hours of 0800-1800 hours Mondays to Fridays and 0800 - 1300 hours on Saturdays or at any time on Sunday or public holidays. The applicant is also advised to seek approval for any proposed piling operations.

RECOMMENDATION 5: The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com

RECOMMENDATION 6: Prior to the commencement of development, the developer shall notify the local planning authority of the commencement of development , and shall display a site notice and plan on, or near the site, in accordance with the requirements of Article 12 of the Town & Country Planning (Development Management Procedure)(Wales)(Amendment) Order 2016.

RECOMMENDATION 7: The developer is advised that bats often roost in houses and other buildings, and work on these buildings may disturb a bat roost. All bats and their roosts are protected against disturbance under UK and European legislation. If works are planned on a building in which bats are known to be roosting, Natural Resources Wales must be contacted for advice.

If work has already commenced and bats are found, or if any evidence that bats are using the site as a roost is found, work should cease and either NRW or a suitably qualified, experienced and licenced ecologist is consulted for advice on how to proceed.

Where there is a likelihood that bats are present, or where bats are found to be present, a suitably qualified and experienced ecological consultant should be contracted to provide an assessment of the impact of the proposed works, and undertake bat surveys if necessary.

Where bats or their roosts are present, no works of site clearance, demolition or construction should take place unless a licence to disturb these species and/or their roosts has been granted in accordance with the relevant legislation.

NRW can be contacted at:-

Natural Resources Wales, Tŷ Cambria, 29 Newport Road, Cardiff CF24 0TP, 0300 065 3000

Bat Conservation Trust can be contacted at:-

5th Floor, Quadrant House, 250 Kennington Lane, London, SE11 5DR, 0845 1300228

1. **DESCRIPTION OF PROPOSED DEVELOPMENT**

- 1.5 An outline application, with all matters reserved, for the demolition of an existing office block and redevelopment to provide student residential accommodation of 323 beds.

The proposed accommodation is indicated as being broken down into 75no. studio rooms, 14x 6 bed cluster rooms, 8x 7 bed clusters, 6x 8 bed clusters and 6x 10 bed clusters (with ancillary communal kitchen/lounge areas).

The indicative plans show ground floor common room facilities, a 234sqm cafeteria, and a 136sqm retail unit.

- 1.6 The indicative plans show the development formed by four blocks:

- Block 1 is to the eastern side of the site, fronting Trade Street and is shown as 7 storeys in height;
- Block 2 is to the northern side of the site and is indicated as being 8 storey height;
- Block 3 is to the western side of the site and is shown as being 4 storeys high;
- Block 4 is to the southern side of the site and is single storey, possibly accommodating a gym.

- 1.7 The four blocks enclose a grassed quadrangle amenity area, and the site vehicle access/egress roadway runs around the perimeter of the site. To the outer side of the blocks, the perimeter road accommodates potential vehicle parking for 4 cars and cycle parking for 130 cycles. A further rooftop amenity area is provided on Block 3.

- 1.8 Although all matters are reserved, the submitted indicative elevation diagrams show a possible finish of facing brick, render/cladding and curtain walling.

2. **DESCRIPTION OF SITE**

- 2.4 The site is approx. 0.36Ha in size and is located within Strategic Site A the Central Business Area (CBA) and Central Enterprise Zone (CEZ) of the

adopted Cardiff Local Development Plan. The site is currently occupied by an office/industrial premises of 2 storey scale.

- 2.5 The site is bounded on all sides by the existing business/industry & warehousing premises, accessed off Trade Street and Curran Embankment
- 2.6 Approx 45-50m to the north along Trade Street lays a site currently under redevelopment to provide 100+ open market apartments (pp 16/00504/MJR).

3. **PLANNING HISTORY**

- 3.1 13/01146/DCI – Temporary change of use to D2 to allow use for gymnastics training - Approved

14/02275/MNR – Temporary change of use to D2 to allow use for gymnastics training – Approved

15/0205/MJR – Demolition of existing offices and redevelopment for student accommodation (tower block) - Withdrawn

4. **POLICY FRAMEWORK**

National policy

- 4.1 Planning Policy Wales (PPW) Edition 9, 2016 favours the sustainable re-use of previously developed land.
- 4.4 The following Technical Advice Notes (TANs) are relevant:
- TAN 12: Design
- 4.5 The following policies of the recently adopted 2016 City of Cardiff LDP are relevant to the consideration of this application:-
- KP2A Cardiff Central Enterprise Zone & Regional Transport Hub
 - KP5 Good Quality and Sustainable Design
 - KP6 New Infrastructure
 - KP7 Planning Obligations
 - H6 Change of Use or Redevelopment to Residential Use
 - C1 Community Facilities
 - C5 Provision for Open Space, Outdoor Recreation, Childrens' Play and Sport
 - EN12 Renewable Energy and Low Carbon Technologies
 - T1 Walking and Cycling
 - T5 Managing Transport Impacts
- 4.4 The following Supplementary Planning Guidance relates to the previous 1996 Local Plan. It is under review following the adoption of the LDP however it remains a material consideration in considering the application insofar as it is consistent with LDP policy:

- Community Facilities and Residential Development (2007)
- Access, Circulation and Parking Requirements (2010)

4.6 In addition to the above, the following new Supplementary Planning Guidance is also relevant:

- Locating Waste Management Facilities Jan. 2017
- Planning Obligations Jan. 2017
- Infill Sites Nov. 2017
- Green Infrastructure Nov. 2017

5. **INTERNAL CONSULTEE RESPONSES**

5.1 The Operational Manager Transportation has no objection to the proposals, subject to conditions and a financial contribution of **£197,433**, making the following comments:

The adopted Access, Circulation and Parking Standards SPG confirms that up to one car parking space per 25 beds may be provided for operational use and that there is no requirement for on-site resident car parking for the sui generis use of student accommodation. There is also no minimum car parking requirement for the ancillary ground floor uses included in the application. In addition, established practice is that one cycle parking space be provided per two to three beds for the proposed type of development (between 108 and 162 for the proposed 323 beds).

Being mindful of the central, sustainable location of the site and that of the proposed use I am satisfied that the proposed development is compliant with adopted parking policy as submitted, with on-site service and operational parking provision only, and the provision of resident/visitor cycle parking as required by condition. It is also expected that active travel and demand for cycle parking will be monitored as part of the conditioned Travel Plan and provision of cycle parking enhanced as may be required to respond to any identified demand.

With reference to location and wider development considerations. It is noted that the site is in a city centre fringe location in the vicinity of Cardiff's main pedestrian shopping area, with direct access to employment, leisure, shopping, etc. opportunities and the main university campus/facilities to the north. The site is also within an area where walking, cycling and public transport offer viable daily alternatives to the use of a private car; having very good access to bus and rail based public transport services in and around Central Station, with access to both local and national rail and bus services. The site is therefore considered to be very sustainably located in broader transport terms and entirely appropriate for the proposed form of development.

It is nonetheless noted that the introduction of circa 323 residents (plus staff, visitors and customers) who will be wholly reliant on walking, cycling and public transport for daily journeys will put a not insignificant additional amount

of non-motorised traffic onto the adjacent highway; where currently there is no footway on the development side of the road, the remaining surfacing is of poor quality and the area currently unlit. A financial contribution of **£145,400** is therefore sought for the reconstruction/resurfacing of Trade Street adjacent to the site, to include the provision of a 2 meter footway on the development side of the road, street lighting, lining/signing, Traffic Orders etc.

The above contribution is considered to satisfy the relevant planning requirements, being necessary to make the development acceptable as well as directly related to the form and scale of the proposed development. The contribution will be used in accordance with the above outline and, as well as facilitating access to the proposed development, when combined with a commensurate contribution received in relation to adjacent development will result in the comprehensive improvement of Trade Street throughout its length.

I am also satisfied, subject to agreement of the conditioned Traffic Management Plans, that there is sufficient capacity on the adjacent public highway to accommodate the arrival and departure of students at the start and end term, and the daily servicing requirements of the proposed scheme. The Traffic Management plan will also assist with the control of student car parking within the site and surrounding area, where parking is currently fully controlled under the Central Parking Zone.

- 5.2 In addition to the above mentioned Highway improvement contribution, the OM Transportation has also provided the cost breakdown for the provision and ongoing (20 year) maintenance of a Council/Police controlled crime camera, having a total cost of **£52,033**.
- 5.3 The Pollution Control Manager (Noise & Air) has no objection, subject to a plant noise condition and noise advice.
- 5.4 The Pollution Control Manager (Contaminated Land) has no objection, subject to conditions in respect of contaminated land issues, with further contaminated land advice.
- 5.5 The Highways Drainage Manager has been consulted and no comments have been received.
- 5.6 The Air Quality Manager has no objection, subject to a dust suppression condition.
- 5.7 The Regeneration Manager has no objection, commenting that the proposed development of 323 bedroom student accommodation generates a requirement for a financial contribution of **£179,019.52** towards the provision or maintenance of community facilities in the vicinity of the site.
- 5.8 The Parks Manager has no objection, advising that whilst having regard for the open space provision on site, the scale of the proposed development generates a requirement for a financial contribution of **£176,529** towards the

provision or maintenance of public open space in the vicinity of the site.

- 5.9 The Economic Development Manager has been consulted and no comments have been received.
- 5.10 The Council's Trees Officer comments that the submitted indicative landscape/tree planting arrangements require further consideration prior to any reserved matters submission so as not to resulting any undue conflict with underground services on the site.
- 5.11 The Council's Ecologist has no objection, commenting that they agree with the provision of 5 bat boxes and 5 bird boxes and that the priority for the bird boxes is the Swift. Furthermore an additional recommendation in respect of appropriate action if nesting bats are encountered is requested.
- 5.12 The Neighbourhood Regeneration Manager (Access) has been consulted and no comments have been received.
- 5.13 The Housing Strategy Manager advises that as the development is wholly for student accommodation, no affordable housing contribution is required.

6. **EXTERNAL CONSULTEE RESPONSES**

6.3 Welsh Water have no objection subject to a drainage condition.

6.4 Natural Resources Wales have no objection, subject to conditions relating to the control of potential contamination of controlled waters.

- 6.3 South Wales Police object to the proposals as the site is within an area where there are instances of crime and anti-social behaviour and the Police consider students to be a 'vulnerable' group. The following comments have been received:

Thank you for your consultation in respect of the above and I comment as follows on behalf of South Wales Police. South Wales Police have had a meeting with developers in respect of the proposed development and discussed problems that exist in the area.

Background

Trade Street is an area of Cardiff which contains predominately commercial and industrial premises and has very few habitable properties, there is a new apartment block under construction opposite Trade Street Lane to the north of the proposed site and which will offer only limited surveillance of Trade Street. The infrastructure of the area is not well developed for residential use, lighting is poor and there are numerous dark hiding places provided by other existing properties which are located in Trade Street. Trade Street has therefore attracted unwelcome activities which bring with them certain local risks. There have been reported incidents of burglary, theft, robbery, prostitution and

vagrancy but it is felt that reported incidents represent only a fraction of the activities that take place because of the above environmental factors.

Students can be a vulnerable group in our society, often young, often away from home for the first time and a significant proportion are lone females. Many students are from overseas and will have no idea or perceptions of local risks; as such particular care needs to be taken with siting of student accommodation and measures put in place to ensure adequate safety and security for students.

While creating a more diverse mix of developments in the area of Trade Street would in the long term help regenerate the area, the placing of accommodation for a vulnerable group such as students in area that has significant social and crime issues would create significant risk without similar investment in measures to reduce the likelihood of crime and disorder. South Wales Police are opposed to the idea of student accommodation being used as the spearhead for development in a high risk area.

South Wales Police welcome redevelopment but would recommend that student accommodation is located only in established communities where high levels of safety and security can be achieved. Having meet with developers and discussed the problems that exist in the area, South Wales Police feel that the applicant has failed to acknowledge or sufficiently address the community safety issues.

South Wales Police would wish to object to the proposed development on the following grounds of crime and disorder and community safety issues.

- 1. The existing infrastructure of the area is very poor to support any large scale student residential accommodation, street lighting is poor, and there is no public CCTV system, the area is currently basically commercial and industrial.*
- 2. At present there are currently very few if any residents in Trade Street who could function as capable guardians although there is a development in progress to provide /flats opposite the entrance to Trade Street lane this will provide only limited surveillance of Trade Street and not of some of key problem areas. The proposed addition of students who are a transient population is likely to provide less effective capable guardianship, compared to more long term resident populations, the reason being that longer term residents tend to have more knowledge and greater connection with the area and therefore more interest in what goes on. Any student accommodation should either be within established communities or secure managed sites. In the current application the development would be be isolated from other residential developments being located further into area where problems are occurring, the student accommodation could be described as spearheading the re -development into the former industrial area. Given that students can be considered as vulnerable groups in terms of age, gender, inexperience and awareness (many*

will be foreign) locating such accommodation in Trade Street will mix this vulnerability with risk which is known from evidence of activities in the area.

- 3. Active surveillance is best provided by capable guardians, the lack of capable guardianship in Trade Street and the adjoining Trade Street Lane, particularly after dark is a major obstacle in improving safety in the area. For effective capable guardianship to function there has to be right environmental factors, Trade Street and Trade Street Lane has poor lighting, this would make it difficult for people to observe issues after dark, the position of the nearby residential development which is under construction is that it will provide only limited surveillance activity, which will not extend as far as the proposed student accommodation. Active communities take time to form and the fact that this will be a new development will mean, that any active guardianship will take time to develop. Current hiding places in Trade Street in Coopers Yard and Trade Street Lane are areas of significant illicit activities and unlikely to be affected any new residential development unless there is also wider environmental improvements.*
- 4. Community pressures in other residential areas nearby have displaced prostitution to quieter commercial / industrial areas of the City such as Trade Street. While official figures would indicate only two arrests for Prostitution took place in Trade Street by Police (2015/2016) evidence from an early morning site visit by Design out Crime Officers of South Wales Police (21/6/17), indicated that there is a serious problem in terms of illicit sexual activities (prostitution) and drug abuse. This evidence included an empty needle packet on the road outside Suffolk House the proposed site. In Coopers Yard which is mixed site of various offices directly opposite the proposed development an abundance of evidence of damage, recent drug paraphernalia in large quantities (including 10 discarded needles and 39 empty glass phials used for injecting), human excrement, and recent fire damage was found (Photographic evidence available).*
- 5. The area is a known pick up point for prostitutes and is regularly attended by the Safer Wales - Street Life Team who provide support, advice and help to sex workers in the area. Evidence of this was clear from numerous used condoms found in both Coopers Yard and Trade Street Lane indicative of sexual activity had been taking place in an open place (photographic evidence available). This was further supported by observations of office staff and a tradesman who worked in Coopers Yard and said they had observed prostitutes providing sexual services to clients in the daytime.*
- 6. Crime prevention operations have identified that some of the people frequenting areas of the city to pick up prostitutes have histories of violence against women.*

7. *The main homeless centres for Cardiff are located not far from the proposed location and are often full and as such a number of homeless people / addicts sleep rough in nearby premises such as Coopers Yard on Trade Street. Often needles and evidence of drug and alcohol abuse are found by patrolling officers and council staff. The evidence of damage and fires is worrying as it suggests a lack of effective control and security in the area.*
8. *A tradesman who regularly works in Trade Street in the evenings indicated to police staff that he frequently confronts prostitutes with clients and drug abusers and feels intimidated it would be far more intimidating for potentially young persons (lone females) be confronted by such behaviour.*
9. *A number of serious incidents have occurred in Grangetown/ Butetown area including a murder and attempted murder a very short distance from the proposed location which have led to community tension. The proposal to site student accommodation in Trade Street, without the area being properly re-developed and establishing a functioning community would lead to students being placed at risk given the current environmental and social issues in the area.*
10. *In terms of design and layout issues, more detail needs to be provided on Security and Safety issues. It is noted that that the application states that some student's clusters/pods will have up to ten rooms per cluster, the maximum advised by Secured by Design is 8. More detailed information is required on physical security, access control, CCTV, management and fire safety (adequate prevention, warning, and evacuation measures) also there needs to be a clearer indication that any proposal will comply with Secured by Design standards to ensure that design and build delivers safe and secure accommodation.*
11. *Given that the applicant has been made aware of the community safety issues in Trade Street the application fails to adequately recognise the challenges or put forward solutions.*

While South Wales Police are happy to engage with developers to try and address community safety and security issues, many of the issues remain outside the developers or wider local authority control. Without addressing the above situational and social issues in Trade Street it is difficult to see how potential risks to students could be reduced.

Should the council be mindful to grant permission for the proposed development South Wales Police would request the following conditions are put in place?

1. *The proposed development is built to Secured by Design standards and all Police recommendations are put into place, **reason** to ensure safety and security at student residence.*

2. *A scheme of work be submitted to the council undertaking to improve lighting to Trade Street and adjoining streets, **reason** to enhance person safety.*
3. *A suitable scheme of work is submitted to extend the public CCTV system into Trade Street and adjoining Streets to provide improved surveillance, **reason** to improve safety and prevent crime in the area.*
4. *An effective management plan is submitted for the proposed development which clearly demonstrates how safety and security will be maintained, **reason** to provide safety and security at student accommodation.*
5. *A scheme of work is submitted to council on how various environmental issues such as hiding places in adjoining premises which encourages anti-social behaviour and poses a risk to personal safety could be satisfactorily addressed. **Reason** to ensure the area is safe enough to provide residential accommodation.*

For further information on Secured by Design standards please visit the website www.securedbydesign.com

In conclusion South Wales Police welcome the opportunity that urban re-development affords to improve both the safety, security and sustainability for communities and have had positive engagement with the developments of other student accommodation in Cardiff to ensure that such accommodation affords students appropriate levels of safety and security. However, in order to achieve the above, the proposed development must take account of environmental context of the location and seek to address any issues. The wider re -development and improvement of the Trade Street would do much to improve community safety issues in the area, but this needs to be in place prior to not after provision of student accommodation in order to establish a functioning community and appropriate levels of guardianship.

- 6.4 Further to the above, additional information in respect of points 1-5 above (should the Council be mindful to grant consent), was submitted by the agent on 14 November and the Police were re-consulted. The following additional comments have been received:

Thank you for the additional information which has been provided by the developer, SWP welcome the details on building security and management and proposal to improve lighting in Trade Street. But item 1.5 suggests that this addresses police concerns in relation to access to the site, police concerns remain as previously stated that the area remains unsuitable for student accommodation.

7. **REPRESENTATIONS**

- 7.5 Local Members have been consulted and any comments received will be reported to Committee.

- 7.6 Adjacent occupiers were notified and no comments have been received.
- 7.7 The application was publicised as a Major development by way of site and press notice. No comments have been received.

8. **ANALYSIS**

- 8.1 The proposal is for the demolition of existing Class B1/B8 (office/warehouse) floorspace at Suffolk House, Trade Street (2768sqm) and the development of a student accommodation scheme comprising 323 rooms, with retail (Class A1 – 136sqm) and café (Class A3 – 234sqm) units to the Trade Street frontage. The site is located within the Central Business Area (CBA) and Central Enterprise Zone (CEZ) of the adopted Cardiff Local Development Plan.
- 8.2 In terms land use policy, the nature of development and the current status of the land is considered as follows:

4. Whether the proposed student accommodation (sui generis) use is acceptable at this location.

The application site is located within the boundary of LDP Policy KP2A (Central Enterprise Zone and Regional Transport Hub – Strategic Site), which is allocated for major employment led initiatives, focussing on financial and business services, together with other mixed uses. The schematic framework for Strategic Site A identifies the site as a location for mixed uses within the CEZ.

Policy H6 of the LDP (change of use or redevelopment to residential use) identifies criteria against which the change of use of previously developed land will be considered, including whether there is an overriding need to retain the existing use of the land and whether necessary community and transportation facilities are accessible or can be readily provided. The Dumballs Road area contains a number of low-density, land-hungry warehouse / industrial uses with much of the site being largely under-utilised, having regard to its strategic city centre location. The applicant has identified in their planning statement that, despite the premises having been actively marketed for Class B (office / warehouse) uses, in recent years the buildings have been in temporary use for gymnastics training purposes (Class D2).

The principle of residential development is well established within the wider Dumballs Road area and the site is well served by transport links and is close to local amenities. In addition, the proposal incorporates two commercial units at the ground floor of the building, which will create active uses along the Trade Street frontage of the development and is consistent with the wider master planning principles for the area.

5. The acceptability of a Class A1 (Shop) use at this location.

As the site is located outside the Central Shopping Area (CSA) of the City Centre and also falls outside of any designated District / Local Centres as identified within the Local Development Plan, any proposal for a Class A1 (shop) use at this location would have to satisfy the three tests of out-of-centre retail policy. In this regard and given the relatively small scale of the proposed unit (136sqm), an element of convenience retail could be considered acceptable to serve the newly established population and the wider residential community within the surrounding area.

6. Whether the proposed A3 (Food and Drink) use is acceptable at this location.

Policy R8 (Food and Drink Uses) of the LDP identifies the Central Business Area as an appropriate location for food and drink uses, subject to amenity considerations.

Given that the application proposes 323 flats to the upper floors, the applicant would be expected to demonstrate how their proposal can address concerns over the potential impact of a ground floor A3 use upon the amenity of residential occupiers. This can be achieved through the applicant accepting a restricted use condition, limiting any use to a café / snack bar / restaurant where their primary function is the sale and consumption of food on the premises rather than a 'bar' use or hot food takeaway, in order to safeguard residential amenity.

- 8.4 Whilst it is noted that this is an outline application, with all matters reserved, sufficient information has been submitted to allow the Local Planning Authority arrive at an informed opinion that the scale and massing principles of the development are acceptable.

The site is located in an area currently dominated by 2-3 storey (commercial scale) industrial and office buildings. However, approx. 45m to the north, along Trade Street, there is currently a residential development of 100+ flats taking place. This development (approved under application 16/00504/MJR) has a massing ranging from 6 to 9 storeys, with the 6 storey southern elevation facing onto Coopers Yard.

At 7 storey height, 'Block 1' as identified on the indicative plans, which fronts Trade Street and also overlooks Coopers Yard, is considered to be an acceptable scale, having no adverse impact on the amenities of any adjacent occupiers.

At 8 storey height, 'Block 2' as identified sits behind 'Block 1' when viewed from Trade Street, and faces onto the side elevation of the commercial properties to the north of the site. These premises do not benefit from any windows to their southern aspect that would suffer any detriment as a result of the proposed block.

At 3 storey height, 'Block 3' as identified occupies the 'rear' of the site and faces towards offices to the east of the site (accessed off Curran

Embankment). The scale of this block and the separation between the existing and proposed elevations is considered to be sufficient to overcome any concerns in term so visual impact on occupiers of the existing offices.

Access to and egress from the site (for vehicles) is reflective of the current situation, with vehicle gates currently located at the northern and southern corners of the site, fronting Trade Street.

- 8.6 With regard to the matters raised in objection by South Wales Police, the Local planning Authority has sought further information from the applicant in order to address the matters contained in the Police representation *“Should the Council be mindful to grant permission...”*.

The following information has been submitted as an addendum to the applicant’s Planning Statement:

Secure by Design

1.2 The proposed development has been reviewed by the crime prevention design advisor and the following recommendations will be incorporated into the proposed development at the reserve matter stage:

1.2.1 Building Security

- The development will be designed to protect property by allowing for natural surveillance.
- Ground floor windows and external doors will be in accordance with PAS24 2012 and all curtain wall fittings must comply with PAS24.
- Security glass will be specified to all windows: this removes the ability to remove the glass from the frame.
- Unrestricted access will not be possible from ground floor retail to student accommodation.

1.2.8 Management

- As part of the management strategy for the building, a 24hr Management team will be in place to ensure a secure and safe environment is maintained for the Students.
- The reception and office located with the Main Entrance will control access of the Students by Key fob access.
- Two persons will be employed at these offices (typical 9am to 5pm) and there will be one security person based at this building at any one time.
- A specific management strategy will be put in place with regards to premises management which details staffing levels, monitoring capability and how issues will be responded too and managed on site.

1.2.9 CCTV

- CCTV will be installed throughout the building in key areas such as the

Main Entrance/Reception, Carpark Entrance, Lift & Stair Lobbies, Lift Cars, Communal Areas including Gym, External/roof top gardens, all linked back to monitors within the Office/Reception.

- CCTV cameras will be to the standard of recognition so all images can be made out and used in a court case.
- All CCTV cameras will be protected against vandalism by being positioned in elevated positions.
- Under data protection, CCTV will be clearly signed internally and externally and labelled with the name of the provider and a number to contact.

1.2.10 Lighting

- Proposed new lighting will protect the whole outside of the building, and vehicle/cycling parking areas. All fittings will be vandal resistant and positioned in elevated positions.
- The lighting will be controlled by photo electric cells and complements and enhances the CCTV coverage on site.

1.2.11 Landscaping

- New trees will be sited in locations that do not interfere with CCTV and lighting, and do not provide an assist to climbing.

1.2.12 Perimeter Security

- The site will be secured by a 2.4m High 'V' Mesh Security Fencing which will be located to the North, East and Southern boundaries. It will be sited on a hard surface or embedded in the ground to prevent persons from getting underneath the fence. This will promote visibility.
- Proposed gates will be of the same height and specification as the fencing/railings.

1.2.13 Waste and Cycle Storage

- The proposed cycle stores will include secure 'Cyclepods Canterbury Bike Compounds'. The storage area will be overlooked from the student rooms and will be served by lighting and CCTV.
- The proposed Waste Storage area will be kept inside a secure, externally accessed store in the main building. The storage area will be overlooked from the student rooms and will be served by lighting and CCTV.

As stated in para. 6.4 above, whilst the Police maintain their position in respect of the suitability of this area for student occupation, they welcome the above mentioned commitments from the applicant.

- 8.6 In addition to the above, the applicant has also agreed to additional security measures to be incorporated into a Highways Improvement scheme, insofar as an additional 3 street lights and a Cardiff Council/South Wales Police

monitored Crime Camera are to be installed on Trade Street (position yet to be determined).

- 8.7 It is also of note that in addition to these physical measures to be implemented by the applicant/developer, there is a considerable passive surveillance enhancement of the area with the occupation of the large scale residential development to the north of the site, with upwards of 65 windows and rooftop terraces directly overlooking the Coopers Yard area.
- 8.8 Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. This duty has been considered in the evaluation of this application.

Whilst the position of South Wales Police in respect of their assessment of Student vulnerability is noted, it is considered that there would be insufficient grounds to refuse planning permission in this respect, having due regard for the above mentioned measures, and the short and long term developments in the area that are under way and that are likely to come forward.

9. **OTHER CONSIDERATIONS**

- 9.1 *Equality Act 2010* – The Equality Act 2010 identifies a number of ‘protected characteristics’, namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The Council’s duty under the above Act has been given due consideration in the determination of this application. It is considered that the proposed development does not have any significant implications for, or effect on, persons who share a protected characteristic.
- 9.2 *Well-Being of Future Generations Act 2016* – Section 3 of this Act imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principle to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs (Section 5). This duty has been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable impact upon the achievement of wellbeing objectives as a result of the recommended decision.

10. **PLANNING OBLIGATIONS**

- 10.1 The following contribution requests have been made, with reference made to the Community Infrastructure Levy tests:

Parks – A contribution of £176,529 is requested towards the maintenance/provision of open space in the vicinity of the site.

Regeneration – A contribution of £179,019.52 is requested towards the provision/maintenance of community facilities in the vicinity of the site.

Transportation – A contribution of £197,433 is requested, towards the improvement of the Trade Street frontage to the site. The contribution is to fund physical improvements to the foot/carriageway, 3 street lights and a crime camera.

In addition to the above, it is recommended that future occupancy by students only is secured through any legal agreement made.

The agent has confirmed that the above mentioned contributions are acceptable to the applicant.

11. **CONCLUSION**

- 11.1 In light of the above, and having regard for adopted planning policy and approved guidance, it is recommended that planning permission be granted, subject to conditions and a Legal Agreement.



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0m 20m 40m 60m 80m 100m

Scale: 1:1250, paper size: A4



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Prepared by: Kate Stevens, 03-04-2017



Proposed Student Accommodation, Trade Street, Cardiff, for Dovey Estates

ORIGINAL SUBMISSION



Proposed Student Accommodation, Trade Street, Cardiff, for Dovey Estates

ORIGINAL SUBMISSION





Site Plan
 1:250 @ A3

AMENDED SUBMISSION

Suffolk House Student Accommodation Trade Street, Cardiff		Job No: 18 001	Rev:
Title: Proposed Site Plan		Drawn: MC	Scale: 1:250 @ A3
Date: 04/01/2018		Rev: AL(01)01	
 Architects Environmental & Urban design		Town planners Environmental & Urban design	
<small>Unit 1A, Campus Business Park, Parc Road, Cardiff, CF24 0EL</small>		<small>www.architectsenv.com 01179 334770</small>	



Trade Street Elevation

1:200 @ A3



South Facing Elevation

1:200 @ A3

AMENDED SUBMISSION

Suffolk House		Job No.	18 001
Student Accommodation		Draw No.	AL(01)10
Trade Street, Cardiff		Rev.	
Title			
Proposed Elevations			
Date	Drawn	Scale	
04/01/2018	MC	1:200 @ A3	
 Architects		Town planners Environmental & Urban design	
<small>102-14, Colwyn Park, Aberystwyth, Powys, SY23 3DA</small>		<small>www.garchitects.co.uk</small> <small>01432 812018</small>	



West Facing Elevation
1:200 @ A3



North Facing Rear Courtyard Elevation
1:200 @ A3

AMENDED SUBMISSION

Suffolk House		Job No.	18 001
Student Accommodation		Draw No.	
Trade Street, Cardiff		Rev.	
Title		AL(01)11	
Proposed Elevations			
Date	Drawn	Scale	
04/01/2018	MC	1:200 @ A3	
		Architects Town planners Environmental & Urban design	
<small>Unit 1A, Commerce Park, Parkway Park, Penarth Road, Cardiff, CF23 8PL</small>		<small>www.g2architects.co.uk Tel: 01446 342070</small>	