Cardiff Peninsula

Orion Land and Leisure Limited

Full Planning Application for Senior Living Accommodation with Associated Car Parking, Cycle Parking, and Landscaping

at

Land at "Plot 1" at Cardiff Peninsula, International Sports Village, Cardiff, CF11 0JS

Planning Statement



Plot 1 at Cardiff Peninsula



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1. Introduction

1.1. Introduction

- 1.1.1 This Planning Statement ('Statement') has been prepared on behalf of Orion Land and Leisure Limited ('the Applicant'), in support of development proposals at land known as "Plot 1", the Waterfront (known as "Cardiff Peninsula") of the International Sports Village, Cardiff, CF11 0JS (hereafter referred to as the 'Site').
- 1.1.2. The description of development is:

"Full planning permission for senior living accommodation with associated car parking, cycle parking, and landscaping"

- 1.1.3. A detailed description of the proposals, including a breakdown of the elements for which full planning permission are being sought, is provided in Section 3 of this Statement.
- 1.1.4. The proposed development will deliver a high quality, sustainable senior living scheme consisting of 77 senior living apartments with associated communal uses and amenity space.

1.2. Application Documents

- 1.2.1. The application documents comprise:
 - Application forms and ownership certificates
 - Covering letter (Savills)
 - Pre-Application Consultation Report (Savills) WILL BE SUBMITTED WITH FINAL APPLICATION
 - Design and Access Statement (ref: CPM-ASC-10-XXXX-PP-A-PL-1030) (Ascot Architects)
 - Plans
 - General Plans (Ascot Architects)
 - Location Plan CPM-ASC-10-0000-DR-A-PL-1001
 - Ground Floor Plan CPM-ASC-10-100L-DR-A-PL-1001
 - First Floor Plan CPM-ASC-10-101L-DR-A-PL-1002
 - Second Floor Plan CPM-ASC-10-102L-DR-A-PL-1003
 - Third Floor Plan CPM-ASC-10-103L-DR-A-PL-1004
 - Fourth Floor Plan CPM-ASC-10-104L-DR-A-PL-1005
 - Roof Plan CPM-ASC-10-105L-DR-A-PL-1006
 - Roof Plan & Landscaping Site Layout CPM-ASC-10-0000-DR-A-PL-0003
 - Ground Floor Plan Site Layout + Constraints CPM-ASC-10-0000-DR-A-PL-0001
 - Ground Floor Plan Site Layout CPM-ASC-10-0000-DR-A-PL-0002

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- Proposed Front Elevations A & B CPM-ASC-10-XXXX-DR-A-PL-1007
- Proposed Rear Elevations E & F CPM-ASC-10-XXXX-DR-A-PL-1009
- Proposed Rear Elevations G & H CPM-ASC-10-XXXX-DR-A-PL-1010
- Draft Sections CPM-ASC-10-XXXX-DR-A-PL-1011
- Indicative Site Sections CPM-ASC-10-XXXX-DR-A-PL-1013
- Proposed Front & Side Elevations C & D CPM-ASC-10-XXXX-DR-A-PL-1008
- Apartment Type Plans CPM-ASC-10-XXXX-DR-A-PL-1012
- Hard and Soft Landscaping Plans (Cameo)
 - Ground Floor Sections Sheet 1 of 2 CPM-CAM-1A-100L-DR-L-PL-0500 Sections GF L500 S3
 - Ground Floor Sections Sheet 2 of 2 CPM-CAM-1A-100L-DR-L-PL-0501_Sections GF L501_S3
 - Landscape General Arrangement Plan CPM-CAM-10-100L-DR-L-PL-0100_General arrangement plan_S3
- o Access Plan C23135-ATP-DR-TP-203 (Apex)
- o Lighting Plan 35172-HML-CH-00-DR-E-172001 (Hilson Moran)
- Transport Statement (ref. C23135/TS101) and Travel Plan (ref: C23135/TP101) (Apex)
- Landscaping Strategy and LEMP (ref. C0168 LEMP 01) (Cameo)
- Drainage Strategy Report (ref. 5498, June 2024) (AKTII)
- Waste Strategy (ref. CPM-HIL-1A-0000-RP-EPL-1001) (Hilson Moran)
- Flood Consequences Assessment (CPM-HIL-1A-0000-RP-E-PL-1001) (Hilson Moran)
- Utilities Report (CPM-HIL-1A-0000-RP-E-PL-1001) (Hilson Moran)
- Energy & Sustainability Report (CPM-HIL-1A-0000-RP-E-PL-1001) (Hilson Moran)
- Construction Management Plan (CPM-HIL-1A-0000-RP-E-PL-1001) (Hilson Moran)
- Ground Contamination Assessment (CPM-HIL-1A-0000-RP-E-PL-1001) (Hilson Moran)
- Noise Report (CPM-HIL-1A-0000-RP-E-PL-1001) (Hilson Moran)
- Air Quality Assessment (CPM-HIL-1A-0000-RP-E-PL-1001) (Hilson Moran)
- Habitats Regulations Assessment (HRA) (ref. HRA/001) (Arup)
- Ecological Impact Assessment (EcIA) (ref. 4-50, June 2024) (Arup)
- Arboricultural Impact Assessment (ref. MB240203-01) (Arbor-Eco Consultancy)
- Schedule of Luminaries (ref. 35172 revP01) (Hilson Moran)
- Green Infrastructure Statement (June 2024) (Cameo)

1.3. Statement Structure

- 1.3.1. This Statement describes the development proposals, the planning policy framework, assesses the scheme's planning merits, and concludes about the planning implications of the proposals. In doing so, the Statement draws upon the other supporting documents (referenced above).
- 1.3.2. Collectively, the application and supporting documents explain and assess all aspects of the proposed development. They demonstrate the benefits that will arise from the senior living proposals, that in all respects the impacts of the proposals are acceptable and where necessary can be mitigated, and that the

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proposals should be granted planning permission in accordance with the presumption in favour of sustainable development.

- 1.3.3. The remaining sections of this Statement are structured as follows:
 - Section 2: outlines the site description and identifies the key planning history to the Site;
 - Section 3: describes the Proposed Development;
 - **Section 4**: identifies the most pertinent planning policy context relevant to the Site and Proposed Development at a national and local level;
 - Section 5: provides and assessment against the key planning considerations, assessing the Proposed Development against the planning policy context (section 4) and other material considerations;
 - Section 6: outlines the key benefits of the scheme;
 - Section 7: provides details on affordable housing; and
 - Section 8: provides the conclusions.





2. Site Description

2.1. Overview

2.1.1. This section provides a brief description of the Site (as a whole) and identifies key planning history. The supporting documents and reports (in particular the Design & Access Statement) provide further site descriptions where relevant.

2.2. Site Description and Context

- 2.2.1. The Site is located at the waterfront (known as Cardiff Peninsula) of the International Sports Village, Cardiff, and covers an area of 0.85ha. The Site is known as "Plot 1" and is presently in use as a car park serving the leisure facilities in the immediate area. To the north of the Site is the International Pool, to the south is the residential Cardiff Pointe development, to the east is the River Ely, and to the west is the Cardiff White Water Rafting Centre. The Site is located entirely within the administrative area of Cardiff Council (CC).
- 2.2.2. The Site Location Plan (ref. CPM-ASC-10-0000-DR-A-PL-1001_LOCATION PLAN_S2) with the Site edged in red is enclosed and identifies the extent of the proposed works. Photographs of the Site and surrounding area are contained in the Design & Access Statement.
- 2.2.3. The Site is located near to various services and transport routes, including the A4055, which is the main link road between Cardiff Bay and Barry, and the A4232 Cardiff Link Road. Cogan train station is located approximately 600m away, whilst Cardiff Central is located approximately 3km away. The nearest bus stop is the Cardiff Ice Rink, which is served by the numbers 7, 8 and 304 buses. The Ely Trail active travel network runs from to the Site, providing an existing walking and cycling route which follows the River Ely from the coastline in Cardiff Bay to the countryside in St Fagans. Details of the Site's transport links are contained in the Transport Statement.
- 2.2.4. The Site constitutes previously developed (or brownfield) land.
- 2.2.5. The Site is wholly located within Flood Zone 3 for Rivers and Sea, which means there is a combined 1% risk of flooding from rivers and the sea including climate change. However, this area is also a TAN15 defended zone, which benefits from Risk Management Authority flood defences.
- 2.2.6. The Site itself has no known heritage assets or historic environment constraints. At a local level, the nearest designated heritage asset is the Ely Tidal Harbour Coal Staithe Number One (ref: GM583) scheduled ancient monument, located approximately 160m south-west of the Site. The Severn Estuary SSSI/SAC is located circa 2km east of the Site, on the other side of the Cardiff Bay barrage.
- 2.2.7. There are no known Tree Preservation Orders across the Site.

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2.3. Planning History

- 2.3.1. The wider area has an extensive planning history, relating to the development of the wider International Sports Village and neighbouring Cardiff Pointe residential development.
- 2.3.2. The planning history of the Site (Plot 1) is outlined in Figure 2.1 below.

Figure 2.1

Reference	Address	Description	Decision	Decision Date
	ISV Site 2	Discharge Of Condition 6 (Remediation	Full	OC Nov
20/01070/MJR	Ferry Road	Scheme) Of 12/00934/DCI In Respect Of	Discharge of	20 1101
	CF11 0SP	Plot 43 Only	Condition	2020

2.3.3. The planning history of the wider site area is outlined in Figure 2.2 below.

Figure 2.2

Reference	Address	Description	Decision	Decision Date
07/01276/C	Cardiff International Sports Village (Whole Site) Dunleavy Drive Grangetown Cardiff	International Sports Village Comprising Sports, Leisure, Retail, Residential, Hotel, Conference Centre, Casino, Restaurant/Bar Development, Highway Access, Transportation Infrastructure, Promenade/Revetment Wall/Pier Structures In Cardiff Bay And Landscaping - Variation Of Condition 26, (And Variation Of Conditions 1, 23, 25, 28, 29 And 55 To Accord With Changes To Condition 26), Of Planning Permission No. 05/1754c, To Increase No. Of Dwellings From 1127 To 1801 (Amended Plans)	Deemed Withdrawn	02 Jun 2017
11/00120/DCI	Land Adjacent To Olympian Drive International Sports Village Olympian Drive Grangetown	New Ice Arena To Seat 2500 Spectators With Associated Cafes + Bars + Temporary Car Park	Deemed Withdrawn	02 Jun 2017
12/01861/DCI	Land At Isv And The Cardiff Arena Ice Rink International Drive Grangetown Cardiff CF11 0JL	Hybrid Application Comprising FULL DETAIL In Respect Of The Demolition Of Existing Temporary Ice Rink And Erection Of New Ice Arena And Associated Temporary Car Parking Provision, Access And Servicing And OUTLINE WITH CONSIDERATION OF ACCESS ONLY In	Permission Granted	17 Jun 2013



		Respect Of Indoor Natural Snow Ski Slope, A1 Retail, A2 Financial & Professional Services, A3 Food And Drink, B1 Office, C3 Residential, C1 Hotel, D1 Non-Residential Institution, And D2 Assembly And Leisure Uses, Access, Parking (Including A Multi- Storey Car Park), Servicing, And Landscaping		
03/01862/R	South Of International Sports Village Site And Land South And West Of Ferry Road Grangetown Cardiff	Leisure Water Complex Including 50m Pool, Leisure Pools, Health And Fitness Centre, Ancillary Cafe, Access, Hard And Soft Landscaping And Temporary Car Parking To Be Known As Cardiff International Pool	Application Withdrawn	21 May 2008
A/08/00010/C	Cardiff International Pool Olympian Drive Grangetown Cardiff	Illuminated Entrance Sign	Permission Granted	10 Mar 2008
03/01863/R	Including Part Of Cardiff Bay And River Land Off Ferry Road And Dunleavey Drive Grangetown Cardiff	Variation Of Conditions 12 And 13 Of Consent 01/2617r	Application Withdrawn	29 Jan 2008
05/01754/C	Including Part Of Cardiff Bay And River Land Off Ferry Road And Dunleavy Drive Grangetown Cardiff	Variation Of Condition 26 Of Planning Permission No. 05/00615/C To Increase The Number Of Dwellings To 1127 (From 997)	Permission Granted	09 Mar 2006
05/02698/C	Including Part Of Cardiff Bay And River Land Off Ferry Road And Dunleavy Drive	Variation Of Conditions 13 And 23 Of Planning Permission No. 05/00615/C	Permission Granted	29 Nov 2005



	Grangetown Cardiff			
05/00475/C	Land South And West Of Ferry Road Grangetown Cardiff	A Leisure Water Complex Including 50m Pool, Leisure Pool, Health And Fitness Centre, Ancillary Cafe, Access, Hard And Soft Landscaping And Temporary Car Parking, To Be Known As Cardiff International Pool	Permission Granted	12 Jul 2005
05/00615/C	Including Part Of Cardiff Bay And River Land Off Ferry Road And Dunleavy Drive Grangetown Cardiff	Variation Of Conditions 1, 3, 5, 6, 10, 11, 13, 25, 26, 28, 39, 41, 43 And 52 Of Planning Permission 01/2617r	Permission Granted	23 Jun 2005
03/02880/R	Including Part Of Cardiff Bay And River Land Off Ferry Road And Dunleavey Drive Grangetown Cardiff	Variation Of Condition 28 Of Consent Ref. 01/2617r	Permission Granted	23 Apr 2004
99/00490/R	Cardiff International Sports Village Ely Fields Ferry Road Grangetown Cardiff	Proposed Mixed Use Development Of Sport And Leisure Facilities With Office, Residential And Retail Use (See Environmental Statement For Details)	Application Withdrawn	06 May 2003
01/02617/R		International Sports Village Comprising Sports, Leisure, Retail, Residential, Hotel, Conference Centre, Casino, Restaurant/Bar Development, Highway Access, Transportation Infrastructure, Promenade/Revetment Wall/Pier Structures In Cardiff Bay And Landscaping	Permission Granted	21 Feb 2003
02/02120/R	Land Off Ferry Road Grangetown Cardiff	Construction Of Revetments And Backfilling Of Ground Behind, Paved Walkway, Cantilevered Boardwalk, Slipways, Removal Of Iron Ore Wharf Structure, Waterside Access Route And Ecological Mitigation Areas	Permission Granted	27 Jan 2003



02/01299/R	Land At Cardiff International Sports Village Ely Fields Ferry Road Grangetown Cardiff	Removal Of Condition 13 Of Full Planning Permission 00/1340r	Permission Granted	25 Jul 2002
98/00650/R	Cardiff International Sports Village Ely Fields Ferry Road Grangetown Cardiff	Proposed Mixed Use Development Of Outdoor And Indoor Sporting And Leisure Facilities, Together With Hotels, Retail, Residential And Office Use (See Environmental Statement For Details)	Application Withdrawn	03 Sep 1999
99/00020/R	Peninsular Site Ferry Road Grangetown Cardiff	Application For Certificate Of Appropriate Alternative Development	Deemed Refusal	07 Apr 1999

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3. Proposed Development

3.1. Proposals Overview

- 3.1.1. The proposed development will make effective and appropriate use of a prominent waterfront site, which responds to the Site's constraints and provides senior living accommodation for the local area.
- 3.1.2. Full planning permission is sought for matters comprising:
 - 77 no. Apartments (comprising 47 no. 1 bedrooms and 30 no. 2 bedroom units);
 - 40 no. surface car parking spaces (including EV charging facilities);
 - · Residential green spaces;
 - Open green spaces;
 - Cycle parking;
 - Board walk; and
 - Associated works.
- 3.1.3. As the proposals are for non-supported living, it falls under a C3 Use.

3.2. Site Layout

- 3.2.1. The Site has been designed to enhance the public realm by offering active frontage along primary streets and the waterfront, which includes a new boardwalk, river view communal terrace and a pedestrian and cycle marina-side link.
- 3.2.2. The C-shaped footprint of the building responds to neighbouring frontages and completes the edge of the residential perimeter block. The layout also includes a central amenity space/courtyard for residents to enjoy.
- 3.2.3. Parking has been strategically positioned to the front/west and east of the Site, facilitating smooth operation for service vehicles.

3.3. Building Height

- 3.3.1. The proposed scheme carefully considers the height of the surrounding buildings and aims to complement them. The building are designed to be between 4 and 6 storeys in height, with taller sections placed strategically from the northwest to the southwest to provide attractive views of the building from key vantage points.
- 3.3.2. This variation in height provides an interesting streetscape and a balanced massing in relation to the surrounding context.

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3.4. Access

- 3.4.1. Site access is proposed along the northern boundary from Empire Way. The access and internal roads have been designed to accommodate cars, service vehicles, and fire tenders within the Site.
- 3.4.2. Additionally, the building footprint on the ground floor incorporates a pedestrian passageway, where the relevant revetment piles are situated underneath.
- 3.4.3. The proposal aims to seamlessly integrate with the existing network of vehicular, cycling, and pedestrian infrastructure. A new boardwalk is also proposed, which will connect to the existing one to the east of the Site. The boardwalk will be built using timber and balustrade to match existing at Cardiff Pointe. The boardwalk will offer an active frontage along the waterfront, and will link Cardiff Pointe to the Cardiff International White Water Centre and beyond.

3.5. Landscaping

- 3.5.1. The landscaping design aims to create a space that offers both relaxation and activity opportunities to the residents.
- 3.5.2. On the ground level, there are several areas designated for the residents, which include:
 - Reception terrace: an area where residents can relax amidst surroundings.
 - Communal dining terrace: a spacious, inclusive area for residents to gather and socialise.
 - River view canal terrace: an ideal place for residents to engage in activities.
- 3.5.3. The proposed development is enclosed by greenery and trees, which enhances the overall harmony of the design.

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4. Planning Policy Context

4.1. Overview

- 4.1.1. The following section provides an overview of the key national and local planning policies that are specifically relevant to the Site and proposed development.
- 4.1.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs Local Planning Authorities to determine planning applications in accordance with the policies of the Development Plan unless material considerations indicate otherwise. Section 38(3) of the Act provides that the Development Plan includes the "development plan documents (taken as a whole) which have been adopted or approved in relation to that area". The adopted statutory Development Plan for Monmouthshire County Council comprises:
 - Future Wales: The National Plan 2040; and
 - Cardiff Local Development Plan (January 2016).
- 4.1.3. This Statement has also been informed by policy and guidance set out in the following:
 - Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;

4.2. National Planning Policy

Future Wales: The National Plan 2040

- 4.2.1. The Welsh Government formally adopted "Future Wales: The National Plan 2040 (Future Wales)" in August 2019 and has been updated in February 2021. Future Wales outlines the Welsh Government's strategies for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, delivering growth in the right areas, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities. Future Wales now forms part of the statutory development plan.
- 4.2.2. Future Wales sub-divides Wales into four regions with the application Site located within the South East region. A total of 36 policies are contained within Future Wales of which 19 are thematic and the remainder relate to the four regions.
- 4.2.3. The following themes and pertinent policies are discussed below because they may be relevant to the determination of this planning application.

Location and Shape of Growth

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- 4.2.4. Policy 1: Where Wales Will Grow identifies a series of National and Regional Growth Areas within which new development is generally to be focussed. One of the National Growth areas is Cardiff, Newport and the Valleys.
- 4.2.5. Policy 2: Shaping Urban Growth and Regeneration states that growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. It then goes on to identify seven key principles for placemaking:
 - · Creating a rich mix of uses;
 - Providing a variety of housing types and tenures;
 - Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;
 - Increasing population density, with development built at urban densities that can support public transport and local facilities;
 - Establishing a permeable network of streets, with a hierarchy that informs the nature of development;
 - Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders, and;
 - Integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment.
- 4.2.6. Policy 3: Supporting Urban Growth and Regeneration Public Sector Leadership notes that the Welsh Government will play an active role in supporting urban growth and regeneration, and will work with local authorities and other public sector bodies to unlock the potential of their land and support them to take an increased development role. The public sector should show leadership and apply placemaking principles to ensure sustainable places, and apply placemaking principles to support growth and regeneration for the benefit of communities across Wales.
- 4.2.7. Policy 8: Flooding outlines that flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. Additionally, it sets out that proposals must not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.
- 4.2.8. Policy 12: Regional Connectivity encourages investment to support sustainable growth and regeneration. Amongst other matters, the policy seeks to reduce levels of car parking in urban areas and requires a minimum of 10% of car parking spaces for new non-residential development to have electric vehicle charging points.

National Growth Area: Cardiff, Newport and the Valleys

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4.2.9. Policy 33: National Growth Area: Cardiff, Newport and the Valleys identifies that this will be the main focus for growth and investment in the South East region. Cardiff, Newport and the Valleys will be recognised as areas of focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. It also notes that the Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance.

4.3. Local Development Plan

Cardiff Local Development Plan (January 2016)

- 4.3.1. The Cardiff Local Development Plan ("LDP") was adopted in January 2016 and is used by the Council to guide and manage development, providing a basis by which planning applications will be determined.
- 4.3.2. The LDP provides the statutory framework for the development and use of land within Cardiff over the Plan period (2006-2026).

Written Statement

- 4.3.3. The LDP recognises that the regeneration of Cardiff Bay represents a significant success story with major redevelopment and infrastructure projects being undertaken over the past two decades. Whilst significant progress has been made a number of sites remain to be implemented including the completion of developments at the International Sports Village.
- 4.3.4. The most pertinent policies to of the LDP are referenced below, but does not seek to be exhaustive:
 - Policy KP5 (Good Quality and Sustainable Design) states that all new development will be required to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces.
 - Policy KP8 (Sustainable Transport) states that developments should be properly integrated with
 the transport infrastructure necessary to make developments accessible by sustainable travel
 modes and achieve a necessary shift away from car-based travel.
 - Policy KP13 (Responding to Evidenced Social Needs) states that the Council will seek to ensure
 a range of dwelling sizes, types and affordability is provided in terms of both market and affordable
 housing to meet identified needs (including supported and sheltered housing and other special
 needs where appropriate), in safe neighbourhoods. In Cardiff, in line with national trends, average
 household size has been declining and in general this has been reflected in an increasing
 proportion of 1 and 2 bedroom flats in schemes with residential consent.



- Policy KP14 (Healthy Living) notes that Cardiff will be made a healthier place to live by seeking
 to reduce health inequalities through encouraging healthy lifestyles, addressing the social
 determinants of health and providing accessible health care facilities. This will be achieved by
 supporting developments which provide for active travel, accessible and useable green spaces,
 including allotments. Key measures include access to well-maintained open spaces for physical
 activity.
- Policy KP16 (Green Infrastructure) notes that green infrastructure which will be protected, enhanced and managed. Proposed Development should demonstrate how green infrastructure has been considered and integrated into proposals with appropriate compensation required where there is a loss.
- Policy KP17 (Built Heritage) states that Cardiff's distinctive heritage assets will be protected, managed and enhanced, in particular the character and setting of its Scheduled Ancient Monuments; Listed Buildings; Registered Historic Landscapes, Parks and Gardens; Conservation Areas; Locally Listed Buildings and other features of local interest that positively contribute to the distinctiveness of the city.
- Policy EN4 (River Corridors) is focused on protecting, promoting, and enhancing the Natural Heritage, character and other key features of Cardiff's river corridors. The Policy aims to protect and enhance the features of Cardiff's river corridors, whilst also facilitating sustainable access and recreation opportunities.
- Policy EN13 (Air, Noise, Light Pollution And Land Contamination) notes that development will
 not be permitted where it would cause or result in unacceptable harm to, amongst other matters,
 local amenity, due to noise or light pollution.
- Policy EN14 (Flood Risk) notes that development will not be permitted where, amongst other
 matters, it would increase the risk of flooding from fluvial and/or tidal flooding or from additional
 run-off from the development in any location. The policy also encourages development proposals
 to incorporate environmentally sympathetic flood risk mitigation measures such as Sustainable
 Urban Drainage Systems ("SUDS")
- Policy T5 (Managing Transport Impacts) seeks to secure safe and convenient provision for all
 highway users, whilst Policy T6 (Impacts on Transport Networks and Services) confirms that
 development will not be permitted which would cause unacceptable harm to the safe and efficient
 operation of the highway, public transport and other movement networks including pedestrian and
 cycle routes, public rights of way and bridle routes.
- Policy C3 (Community Safety/ Creating Safe Environments) notes that all development and redevelopment shall be designed to promote a safe and secure environment and minimise the opportunity for crime.



Proposals Map

4.3.5. An extract of the Proposals Map, showing the Site (in blue) is shown in **Figure 4.1** below.

Superstone

Sewage Ppg Star

FFOROD Y INVEROOR ETH LEADING TOWN

Lighting Town

Figure 4.1: Site Location

Source: Cardiff Council

- 4.3.6. The LDP Proposals Map confirms that the Site is within the defined settlement boundary.
- 4.3.7. The Site is located adjacent to a River Corridor, in which **Policy EN4: River Corridors** provides a planning framework within which the Council can protect, promote and enhance the river corridors.
- 4.3.8. The Site is also located adjacent to the 'Bay Pointe' Housing Commitment over 500 dwellings (shown in red).

Planning Policy Wales (Edition 12, February 2024)

4.3.9. Planning Policy Wales ("PPW") forms the overarching national planning policy documents within Wales, providing guidance to LPAs about the determination of planning applications through their development management functions. Although it does not have development plan status, it is capable of being a material consideration in the determination of planning applications.

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- 4.3.10. Paragraph 1.18 states that there is a presumption in favour of sustainable development in accordance with the development plan for an area unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.
- 4.3.11. Paragraph 3.6 states that development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of older people.
- 4.3.12. Paragraphs 3.20 3.22 note that the planning system should identify proactive and preventative measures to reduce health inequalities, including enabling opportunities for outdoor activity and recreation, and they should develop and maintain places that support healthy, active lifestyles across all age and socio-economic groups.
- 4.3.13. Paragraph 3.55 highlights that previously developed land should be used in preference to greenfield sites where it is suitable for development.

Other Relevant Documents

Housing for Older People, RTPI Practice Advice (November 2022)

- 4.3.14. The Royal Town Planning Institute (RTPI), Chartered Institute for Housing (CIH), Centre for Ageing Better, the Older People's Housing Champions Network and Associated Retirement Community Operators (ARCO) have joined together to publish the Housing for Older People Practice Advice (November 2022).
- 4.3.15. The following principles developed by the Housing for Older People Panel for Innovation (HAPPI) have become mainstreamed within the older people's housing sector and they are near universally applied in new developments and are widely accepted as standard. Whilst the design of individual homes is vitally important to how people can live well as they age, it is only one aspect of the issue. Quality housing needs to be built in the right location, integrated into accessible neighbourhoods, with good, safe access to local shops and health care services, public transport and the natural environment.

4.3.16. The HAPPI principles are:

- Space and flexibility generous internal space standards, designed to accommodate flexible layouts;
- Daylight care is taken with the placement, size and detail of windows to ensure plenty of natural light, and to allow daylight into circulation spaces;
- Outdoor space building layouts maximise natural light and ventilation by avoiding internal corridors and single aspect flats. Apartments have balconies, patios, or terraces with enough space for tables and chairs as well as plants;

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- Adaptability homes are adaptable and designed to be 'care ready' so that new and emerging technologies, such as telecare and community equipment, can be readily installed;
- Circulation space building layouts promote circulation areas as shared spaces, encouraging
 interaction, supporting interdependence and avoiding an 'institutional feel', including the
 imaginative use of shared balcony access to front doors and thresholds, promoting natural
 surveillance and providing for 'defensible space';
- Shared facilities in all but the smallest developments (or those very close to existing community facilities), multi-purpose space is available for residents to meet, with facilities designed to support an appropriate range of activities – perhaps serving the wider neighbourhood as a community 'hub', as well as guest rooms for visiting friends and families;
- Natural environment public realm design measures ensure that homes engage positively with the street. New trees and hedges are planted, and mature planting is preserved to provide wildlife habitats, as well as colour, shade and shelter;
- Sustainable design homes are energy-efficient and well insulated, but also well-ventilated and able to avoid overheating by, for example, passive solar design, the use of native deciduous planting supplemented by external blinds or shutters, easily operated awnings over balconies, green roofs and cooling chimneys;
- Storage adequate storage is available outside the home together with provision for cycles and mobility aids, and storage inside the home meets the needs of the occupier; and
- External shared surfaces and 'home zones' shared external surfaces, such as 'home zones' give priority to pedestrians rather than cars, with due regard to the kinds of navigation difficulties that some visually impaired people may experience.

Cardiff Older Persons Housing Strategy 2019-2023

- 4.3.17. The Cardiff Older Persons' Housing Strategy says that by 2037 the number of people aged 65 to 84 will increase by 42% while those over aged 85 will nearly double.
- 4.3.18. There is an estimated additional need for 3,051 units of older person's accommodation by 2035.
- 4.3.19. The strategy also recognises that whilst there are a range of schemes for building new older person/care ready affordable homes are already planned and these will deliver 741 new homes by 2030. If all schemes go ahead this will exceed the estimated additional need for rented accommodation of 585 units however, it is unlikely that all existing older persons' accommodation will meet future requirements and some may need to be decommissioned. Therefore, the Council will continue to seek opportunities to develop future housing.

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Assessment

5.1. Introduction

5.1.1. This section of the Planning Statement assesses the key planning considerations relevant to the proposed development, taking into account the policy framework, planning history and analysis within the suite of supporting application documents.

5.2. Land Use

- 5.2.1. The Site is located within the defined urban area of Cardiff on the adopted Local Plan Proposals Map, and comprises previously developed land using the definition in PPW12. As outlined previously, the development proposals are for non-supported living, it falls under C3 use. Although the Site is not allocated for housing, it is ideally located in an area which is due to come forward under the future masterplan for the wider area, and is located adjacent to the Cardiff Point residential development which is already in situ.
- 5.2.2. The principle of development is further confirmed by the planning history on the Site including outline planning permission (ref. 01/02617/R) for the International Sports Village comprising Sports, Leisure, Retail, Residential, Hotel, Conference Centre, Casino, Restaurant/Bar Development, Highway Access, Transportation Infrastructure, Promenade/Revetment Wall/Pier Structures in Cardiff Bay and Landscaping, which was approved in December 2003.
- 5.2.3. The proposals for the wider masterplan will be subject to a separate planning application, due to be submitted later this year.
- 5.2.4. It is therefore considered that the Site is suitable for accommodating senior living residential development.

5.3. Design

5.3.1. The proposals are of high quality design which will transform the Site into a high end senior living residence, which will include open green spaces, activity areas, and allotments, which are surrounded by greenery to provide shelter from natural elements like wind and sun, while also encouraging local biodiversity. A Design and Access Statement (DAS) (Ascot Design, ref. CPM-ASC-10-XXXX-PP-A-PL-1030) has been submitted alongside the application which outlines the design strategy for the Site in further detail.

5.4. Drainage and Flood Risk

5.4.1. The Site lies within a Flood Zone 3 (High Risk) for fluvial sources (River and Seas), meaning there is a 1 in 100 chance or greater (1% Annual Exceedance Probability) of the Site flooding from river sources or a



- 1 in 200 (0.5% AEP) of flooding from sea/costal resources. This is due to the proximity to the River Ely and being affected by tidal influences from the Severn Estuary.
- 5.4.2. From data provided by Natural Resources Wales (NRW), it was demonstrated that the highest modelled flood level expected within the Site is 8.62m AOD. This is from the 1 in 100 fluvial extreme tidal (T200) scenario plus climate change (CC). The flood maps also highlighted that the site location is affected by pluvial sources, mainly concentrated within the centre of the site. Upon further review, the "ponding" displayed within the flood maps is created because the maps do not take account of the on-site drainage, currently within the site. The ponding is caused by the drainage regime in the carpark which is designed to concentrate flows within its centre (acting as a basin). Then the flows enter slots drains found in the centre of the area and are conveyed off-site via highway drains underneath the carpark. Other sources of flood risk such as reservoir flooding have been assessed but these have also been deemed low, due to the strict monitoring and maintenance conducted by NRW.
- 5.4.3. The Welsh Technical Advice Note 15 (TAN15) states that all developments must be designed to be flood-free during a fluvial 1% Annual Exceedance Probability (AEP) or 0.5% AEP for coastal flooding. Consultation with NRW on 07/03/2024 stipulated that the entire development boundary ground level is required to be above the fluvial flood levels of 8.62m AOD, in order to demonstrate compliance with the TAN15 requirements.
- 5.4.4. It is intended that site-wide, the ground levels will be modified to be above 8.62m AOD and the finished floor levels (FFL) of the building to be set no lower than 8.92m AOD, providing a 300mm additional "freeboard" for ground floor sleeping accommodations. Therefore, this development will comply with the TAN15 in terms of flood risk.
- 5.4.5. In terms of drainage, the proposed Sustainable Urban Drainage Strategy (SuDS) is to discharge unattenuated and unrestricted into the water bodies as per the existing situation.
- 5.4.6. The proposed architectural and landscape features such as green roofs, gardens, etc. will provide attenuation during small storm events and they will serve as water treatment. This will improve the quality of the discharged surface water as it currently runs across contaminated land before reaching the water bodies.
- 5.4.7. In addition, Cardiff Bay's Barrage Locks are used to maintain a constant and safe water level within the Bay which means that discharging unrestricted into the water body will not increase the flood risk. This was agreed with the Cardiff Council Sustainable Drainage Advisory Board in a meeting held on the 19th April 2024.
- 5.4.8. However, this philosophy would need to be agreed with Cardiff Council Sustainable Drainage Approval Body via a SuDS Scheme Application. In addition, the discharge method will also need to be agreed with the Marine Licensing Team.

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5.4.9. The proposed drainage strategy drawings and proposed SuDS are contained within the Drainage & Earthworks Strategy Report (AKTII, ref. 5498, June 2024)

5.5. Transport and Parking

- 5.5.1. The Site currently consists of a car park which serves the uses within the ISV area, with an existing priority junction access onto Empire Way. In addition, permission was granted in 2013 for a residential development of 79 units. As such, the site has a recent permission for a similar use to that now proposed on the site, with up to 47 hourly vehicle movements accepted on the network in relation to this use.
- 5.5.2. The Site is providing 40 car parking spaces which equates to a ratio of 0.52 spaces per unit, which is within the maximum parking standards. Movements to and from all spaces can be accommodated appropriately. Cycle parking is also provided in accordance with the standards, and the Site will also have secure mobility scooter storage.
- 5.5.3. Servicing will be accommodated within the Site, with refuse vehicles able to turn and access the bin storage location appropriately. Delivery and other servicing vehicles can utilise the on-site servicing bay, which will also accommodate ambulances. Fire tenders can access the Site appropriately and in accordance with the relevant building regulations. All vehicles are able to enter and exit the site in forward gear, using the turning areas provided.
- 5.5.4. The Site is situated in a sustainable location. Potential future residents can walk, cycle or use a mobility scooter to access a number and range of facilities and services within appropriate distances via good quality routes, reducing the need to travel by car.
- 5.5.5. The Site also has excellent public transport links, which provide a suitable, attractive and realistic alternative to travelling by car. These will be further improved once the infrastructure is delivered in relation to the Cardiff Council Bus Priority Infrastructure Plan, delivering improvements to key routes serving the ISV area. This will benefit and attract residents and staff that would prefer to travel by public transport.
- 5.5.6. The submitted Transport Statement (Apex, ref.C23135/TS101), states that obtained road safety data does not indicate an existing safety issue which would be exacerbated by the proposals and no evidence of a safety issue on key pedestrian / cyclist routes surrounding the Site.
- 5.5.7. The peak forecast generation equates to approximately one vehicle on the local highway network every five to six minutes, on average, during the busiest hour. This is a minimal level of vehicle movements and would not lead to queuing for right turning vehicles into the site or an impact on blocking back to the Olympian Drive roundabout.
- 5.5.8. A Travel Plan (Apex, ref: C23135/TP101) has also been produced to further encourage travel by sustainable travel for residents, employees and visitors, and should be read in conjunction with this application.

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- 5.5.9. Overall, the Site location will encourage and promote sustainable travel behaviour. It is therefore fully in accordance with transport policies in Future Wales, PPW12, TAN18 and the Cardiff Council Managing Transportation Impacts SPG.
- 5.5.10. The development would not have an unacceptable impact on road safety and the proposed access arrangements would be safe and suitable.
- 5.5.11. The proposed parking provision is within the maximum standards and fully in accordance with the objectives for encouraging sustainable travel and reducing car use as set out in PPW12 and Future Wales. The proposals would not have a material impact on the operation of the highway network and no mitigation is required.

5.6. Noise

- 5.6.1. A comprehensive noise impact assessment was undertaken to determine the suitability of the Site for the proposed uses and the potential impacts of the Proposed Development upon nearby sensitive receptors. (Hilson Moran, ref. CPM-HIL-1A-0000-RP-E-PL-1001).
- 5.6.2. Baseline noise surveys were undertaken which confirmed that noise levels at the site are relatively quiet for a location near urban use, but vary depending on proximity to the local road links. Future noise levels will be influenced by proposed changes to road traffic flows resulting from the development and committed schemes in the area.
- 5.6.3. Existing noise levels at the Site show the Site to fall into TAN 11 noise exposure category B. On that basis, it is considered that with good acoustic design and appropriate conditions limiting noise emissions where necessary, the Site would be considered suitable for residential use in terms of noise. Acoustic design in the form of preliminary environmental noise ingress specifications and assessment of external amenity has therefore been considered.
- 5.6.4. The prevailing noise levels at the Site indicate that standard double-glazing packages (29 dB Rw+Ctr) would be suitable for the residential façades of the Proposed Development, to achieve standard guideline internal noise levels for residential use. Passive ventilation strategies with acoustically rated trickle vents (36 dB Dn,e,w) would be appropriate where natural ventilation is targeted.
- 5.6.5. External amenity spaces are proposed for the development. Imperforate balustrades and/or absorptive soffits to balconies would reduce levels at the noisiest façades facing the north-west and south-west to achieve external levels recommended by BS 8233:2014 and WHO,199 guidance. It is noted, however that these recommendations are just guidance and that the levels are not achievable in all circumstances where development is desirable. In addition, external amenity spaces at ground level are provided, where noise levels are lower and within guideline recommendations, and consequently occupants with noisier balconies will still have access to quieter outside spaces.

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- 5.6.6. The impact of noise from building services plant has been assessed in accordance with CC's plant noise criteria, with plant noise limits being set to which all fixed plant will need to be designed (collectively) to achieve.
- 5.6.7. Impacts of changes in road traffic flows resulting from the development are expected to be negligible.
- 5.6.8. Through the above, the Proposed Development is considered suitable for the proposed use and will minimise and mitigate the levels of noise emitted to the area surrounding it in line with the requirements of TAN 11 and Planning Policy Wales.

Ground Conditions

- 5.6.9. A Phase 1 Contaminated Land Assessment was undertaken to determine the likely ground conditions below the site, what potentially contaminative activities may have occurred at the property or in the surrounding area which may pose an environmental or geological risk to site users, the surrounding environment or Proposed Development, either at present or in the future.
- 5.6.10. The submitted Ground Contamination Phase 1 Assessment (Hilson Moran, ref. CPM-HIL-1A-0000-RP-E-PL-1001) concluded that the ground conditions comprise Made Ground (up to 6m thick) overlying Tidal Flat Deposits, Glaciofluvial Deposits and Mudstone and confirm previous conclusions regarding the likely post-remediation ground conditions.
- 5.6.11. The residual ground contamination including elevated levels of heavy metals and hydrocarbons (and possibly asbestos in soils) was anticipated based on historical information. However, the results of the A2SI Investigation indicate that soils within Plot 1 are not significantly contaminated, with no exceedances of the GAC for Residential Use (without significant consumption of homegrown produce). No asbestos was detected in any of the samples analysed. There was some evidence of low level / residual hydrocarbon contamination noted during the investigation including hydrocarbon odours but these are not considered a significant risk in the context of the proposed development.
- 5.6.12. The groundwater quality is generally good given the history of the Site and surrounding area and risks to water resources are considered low. With the exception of slightly elevated heavy metals above water quality standards in all three groundwater samples analysed other parameters were below the level of detection. A potentially high level of ammoniacal nitrogen was recorded in RC04 (D) which is located in the Glaciofluvial Gravels which warrants further investigation. An additional round of groundwater sampling is due to be undertaken as part of the A2SI Investigation. Results are not available at the time of writing. WILL BE AVAILABLE FOR FINAL SUBMISSION.
- 5.6.13. Initial ground gas monitoring results indicates gas characteristic situation CS-1, where no ground gas protection measures on buildings are required. However, only a limited ground gas monitoring programme has been undertaken as part of the A2SI Investigation. Further ground gas monitoring is required as part of the detailed design of the development to provide a robust dataset and aid the assessment and understanding the ground gas regime and risk to the proposed development.

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- 5.6.14. Raising of the Site is required for flood risk purposes (to 8.92mAOD which is broadly 750mm above existing ground level). Excavation for foundations, roads, services and drainage will generate subsoil arisings however initial calculation by AKTII indicate there will be a shortfall of approximately 2000m3. There is a potential to utilise the stockpiled material located on the Peninsula to make up the shortfall. This material was previously classified as 'General Fill' in accordance with the original CISV/Cardiff Pointe remediation strategy.
- 5.6.15. Initial indications from the A2SI Investigation are that the soils have a low leaching potential with respect to contaminants.
- 5.6.16. Foundation designs include the use of piling therefore a piling risk assessment will be required as part of the detailed design to assess the risk to underlying Secondary Aquifers (Superficial and Bedrock). However, initial indications from the A2SI Investigation suggest risks will be low.

5.7. Ecology

- 5.7.1. The application is accompanied by an Ecological Impact Assessment (EcIA) (Arup, ref. 4-50, June 2024), which establishes baseline ecological conditions on the site and determines the importance of ecological features which could be affected by the proposed development. It assesses impacts and sets out any avoidance and mitigation measures necessary for compliance with wildlife legislation and planning policy, as well as assessing the project's contribution to net benefit to biodiversity through an ecosystem resilience assessment.
- 5.7.2. During the design phase the step-wise approach was followed; ecologists were consulted by the design team early in the design process, such that as many impacts as possible were avoided early on through careful design. Sensitive ecological receptors were identified and avoided as far as possible, for example buildings were set back from the River Ely as much as possible, an important habitat for bats, otter and fish, and a small area of scrub was retained in the northeast of the site, along with retention of as many existing trees as possible. Species requirements and their habitats were factored into the design process, with avoidance of impacts prioritised. Where it was not possible to avoid an impact entirely, the design next sought to mitigate and restore, prior to then compensating for on site. Green roofs were included for biodiversity and to provide benefits to bats, invertebrates and plants, and the landscaping plan was designed to provide increased connectivity around the site. A lighting design sensitive for bats was also completed.
- 5.7.3. It is proposed that two habitat areas will be retained scrub and trees to the northeast corner of the site and trees on the north and northwest border of the site. These will allow the retention of some mature vegetation with some value to birds.
- 5.7.4. The construction phase of the proposed development will result in a total loss of 1,421m² of semi natural habitats on site including dense scrub, poor semi-improved grassland, amenity grassland and species poor hedgerow. Therefore the creation of replacement habitats for existing species on site was prioritised



- through the design process, maximising the area of habitats available, as well as designing them to provide ecosystem resilience through increased diversity; extent; condition; and connectivity.
- 5.7.5. The loss of any habitats on site are mitigated/restored and further enhanced through embedded landscape design, which is described in detail in the accompanying EcIA, and includes deadwood retained from clearance of the scrub on the south edge of the Site, incest hotels, bat boxes, a variety of bird boxes, and bee bricks.
- 5.7.6. Overall post development a total of 3,789m² of terrestrial semi natural habitats will be provided as part of the embedded landscaping design as described in Section 7.2.5 of the accompanying report. This is an increase of 2,285m² compared to the baseline with habitats include amenity grassland, shrub, herbaceous vegetation, wildflower grassland, green roof and allotment areas. There will also be the addition of 169m of species rich linear hedgerow, an increase of 134m compared to the baseline. 15 trees will be removed and 11 retained. 54 new trees will be planted with species selection favouring native species and those with wildlife benefits.
- 5.7.7. The lighting strategy has been designed with reference to the ILP bat lighting guidance. Activity surveys across the wider Site showed that the River Ely, which is adjacent to the site, is an important flight line and foraging resource for bats. This informed the requirement for a dark corridor for bats to be provided within the design along the south edge of the Site. A dark and vegetated corridor was also identified as being important along the north edge of the site in order to facilitate bat movement across the area. Although it is acknowledged that the potential dark corridor to the north is lit in places with existing street lighting, the development has still been designed to reduce light spill to a minimum to the north in order to allow potential future development of the area to a dark corridor, and reduce the impact from the development of additional lighting to this area, so that more light tolerant species of bat such as common pipistrelle can still use it. The provision of trees in this area was also prioritised within the landscape design to further reduce the impact of street lighting on the surrounding area. In terms of the new landscaping design, any semi natural landscaped areas within the development, comprising green roofs, trees, wildflower planting, lawn areas and vegetation were considered to be key habitats for bats and lighting was therefore designed to avoid light spill on these areas wherever possible.
- 5.7.8. Where it was not possible to avoid lighting areas, mitigation measures were used to reduce lighting to a minimum, which includes using warm white light sources of 2700k or lower to reduce the blue light components, ensuring all luminaires are fall cut-off and therefore do not contribute directly to light pollution and are dark sky compliant, and using blanking plates where lighting is not required behind the luminaire. These measures are detailed within the Lighting Layout (35172-HML-CH-00-DR-E-172001_P03), which has been submitted as part of this application.
- 5.7.9. To ensure newly created habitats achieve good condition, are properly maintained and to ensure net benefit for biodiversity, all habitats across the site will be managed in accordance with the submitted Landscape Environmental Management Plan (LEMP) (Cameo and Partners & Arup, ref. C0168 LEMP 01)



- 5.7.10. Overall, the habitats provided can be considered to be over and above that required for mitigation or compensation but also provide an enhancement subject to correct management secured through a LEMP. The increased extent, diversity and condition of habitats on site post development will provide net benefit for bats, birds, other small mammals, and invertebrates.
- 5.7.11. The application is also accompanied by a Habitats Regulations Assessment (HRA) (Arup, ref. HRA/001) which considers the potential effects on the European Sites in relation to the conservation objectives for the features of the European Sites and any identified potential pathways for effects. Three European Sites were identified located 1.2km south-east of the site comprising the Severn Estuary SPA, SAC and Ramsar (all forming the wider Severn Estuary EMS designation), noted for their Annex 1 habitats, migratory fish species and important bird populations.
- 5.7.12. In the absence of mitigation, the Screening Assessment has identified a potential pathway to produce a Likely Significant Effect on the Severn Estuary EMS as a result of toxic contamination; water pollution and sediment run-off. The screening has not identified any further pathways to produce Likely Significant Effects.
- 5.7.13. Best practice mitigation for potential effects on water quality and adverse effects on the hydrological connecting European Sites (Severn Estuary SAC, SPA and Ramsar) have been outlined in the Appropriate Assessment within the HRA. With the implementation of this mitigation, there will be no adverse effects on the integrity of the European Sites (Severn Estuary SAC, SPA and Ramsar) and their features, either alone or in combination with other plans and projects.



6. Key Benefits

6.1.1. Future Wales outlines how sustainable development can be achieved through four overarching principles; social, cultural, environmental, and economic. The table below sets out how the proposal contributes towards the four objectives of sustainable development taking account of local circumstances. The overarching principles of the Local Plan supports this principle of Future Wales.

	Public Benefit
	T ubito Benefit
Social / Cultural	 Provision of 77 senior living apartments comprising 47 no. 1 bedrooms and 30 no. bedroom units, which will help contribute to the vitality of the area. Providing, in part, for a group of society which is expected to increase by 42%, while those over aged 85 will nearly double according to the Cardiff Older Persons' Housing Strategy. Improving the built environment and create a new community in the Cardiff Peninsula, which is ideally suited for access to the city centre. The new boardwalk will offer an active frontage along the waterfront, and will link Cardiff Pointe to the Cardiff International White Water Centre and beyond.
Environmental	 A high quality landscape strategy which seeks to increase the amount of soft landscaping and greenery throughout the site as well as improving cohesion between the plant species. Increased landscaping will offer an opportunity for increased biodiversity. The proposals seamlessly integrate with the existing network of cycling and pedestrian infrastructure, which promotes active travel. The proposed development reduces carbon emissions in accordance with the latest Building Regulations and interim Future Homes Standard (FHS) using the energy hierarchy and helping mitigate the effects of climate change. The development reduces initial energy demand through passive and active design measurement, such as the highly efficient fabric of the structure. The design also incorporates measures to limit heat loss through passive solar gain and cooling through the orientation and layout of the development, careful detailing to avoid thermal bridging, setting goof air tightness targets, and incorporates renewable energy in the form of air source heat pumps and solar panels. The proposed development minimises the use of water, through the use of water-efficient fittings to reduce water consumption to 105 litres per person per day. The Site features EV charging.
Economic	Creation of numerous new jobs in the construction sector.



- The redevelopment of this Site will vastly improve the appearance of the Cardiff Peninsula and act as a catalyst to the masterplan development in the wider Peninsula.
- New residents to the area will help to support local shops and services and improve the vitality of the Peninsula.

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7. Affordable Housing

7.1. Affordable Housing Statement

- 7.1.1. Policy H3 (Affordable Housing) in the LDP outlines the Council's position on affordable housing. The Council will seek 20% affordable housing on Brownfield sites and 30% affordable housing on Greenfield sites in all residential proposals that:
 - i. Contain 5 or more dwellings; or
 - ii. Sites of or exceeding 0.1 hectares in gross site area; or
 - iii. Where adjacent and related residential proposals result in combined numbers or site size areas exceeding the above thresholds, the Council will seek affordable housing based on the affordable housing target percentages set out above.
- 7.1.2. Affordable housing will be sought to be delivered on-site in all instances unless there are exceptional circumstances.
- 7.1.3. The Policy states that in negotiating affordable housing, each proposal's actual contribution will depend on that scheme's capacity for provision. This will ensure that the affordable housing contribution in itself will not make the scheme unviable. The Council will work with developers to agree a contribution in an open and transparent manner. In cases where agreement cannot be reached, an independent assessment will be commissioned to be paid for by the applicant/developer. The assessment should include details and costs of the necessary infrastructure to be delivered either wholly or in part to support the delivery of sustainable neighbourhoods.
- 7.1.4. Once there is certainty from the Council about the acceptability of the proposals, the client will be looking to submit a viability report.

Plot 1 at Cardiff Peninsula



8. Conclusion

- 8.1.1. This Planning Statement has been prepared in support of a full planning application on behalf of Orion Land and Leisure Limited for senior living apartments.
- 8.1.2. The proposed development will deliver a high quality, sustainable scheme consisting of 77 senior living apartments with associated communal uses and amenity space, which will contribute to the much needed older persons' accommodation in Cardiff.
- 8.1.3. This Statement has summarised the conclusions of the supporting reports and therefore sets out the impacts of the proposals. These reports have set out the numerous benefits of the proposals and policy compliance.
- 8.1.4. This Statement has demonstrated the planning case in support of the proposals in the context of relevant national and local planning policy. It has also identified the significant benefits of meanwhile uses proposals to the immediate and wider area. It is therefore respectfully requested that the proposals are recommended for approval and planning permission granted.