



AUGUST 2025

Planning and Affordable Housing Statement

Plots 4 and 5, Central Square, City Centre, Cardiff

Iceni Projects Limited on behalf of
REAP 3 Limited

August 2025

ICENI PROJECTS LIMITED
ON BEHALF OF REAP 3
LIMITED

Iceni Projects

Birmingham: The Colmore Building, 20 Colmore Circus Queensway, Birmingham B4 6AT

Edinburgh: 14-18 Hill Street, Edinburgh, EH2 3JZ

Glasgow: 201 West George Street, Glasgow, G2 2LW

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

Manchester: WeWork, Dalton Place, 29 John Dalton Street, Manchester, M26FW

t: 020 3640 8508 | w: iceniprojects.com | e: mail@iceniprojects.com

linkedin: [linkedin.com/company/iceni-projects](https://www.linkedin.com/company/iceni-projects) | twitter: [@iceniprojects](https://twitter.com/iceniprojects)

Planning and Affordable Housing
Statement
PLOTS 4 AND 5, CENTRAL SQUARE, CITY CENTRE,
CARDIFF

CONTENTS

1. EXECUTIVE SUMMARY.....	1
2. INTRODUCTION.....	3
3. APPLICATION SITE AND BACKGROUND	7
4. PROPOSED DEVELOPMENT.....	13
5. PLANNING POLICY.....	16
6. PLANNING ANALYSIS	21
7. SUSTAINABLE DEVELOPMENT AND SCHEME BENEFITS	49
8. PLANNING BALANCE AND CONCLUSION	53

1. EXECUTIVE SUMMARY

1.1 This Planning and Affordable Housing Statement has been prepared by Iceni Projects Limited ('Iceni') on behalf of REAP 3 Limited ('the Applicant') in support of an application for full planning permission for the redevelopment of the site at Plots 4 and 5, Central Square, City Centre, Cardiff ('the Site').

1.2 This application seeks full planning permission for the following description of development, hereafter 'The proposed development':

"Mixed-use development to provide residential accommodation, flexible non-residential uses, cycle parking, landscaping and other associated works"

1.3 A comprehensive summary of the pre-application and consultation process, and how the scheme has evolved in direct response to feedback, is presented within Section 4 of this Planning and Affordable Housing Statement, the Design and Access Statement prepared by 5plus Architects ('5plus') and the Pre-Application Consultation Report, prepared by Iceni.

1.4 The Site sits at the heart of the wider 'Central Square' regeneration area in Cardiff City Centre. Central Square is a strategically important area which the Council consider to be a gateway to the City, and an opportunity to showcase the best that Cardiff has to offer. Given the strategic importance of the location, the Council envisage that the regeneration of Central Square, towards which this development will contribute significantly, will play a key role in attracting investment on other strategically important development sites in the City.

1.5 The proposed development provides the opportunity to make a significant positive contribution to the ongoing regeneration of this part of Cardiff. The proposed development will build upon the success of the wider Central Square area, proposing a development of exceptional architectural and residential quality. The Applicant is fully committed to the delivery of the Site, and it is their ambition to create a new iconic landmark for Cardiff and Wales.

1.6 As well as the delivery of much needed high-quality homes to address the Council's housing need, the proposed development brings with it a wide range of enhanced planning and public benefits. The benefits include the delivery of a strategically important City Centre site, new flexible non-residential floorspace that will activate Central Square, a publicly accessible bike hub and cafe, a new pavilion building that can accommodate a restaurant, extensive public realm and landscaping in and around

the buildings, highly sustainable and energy efficient buildings, and other significant economic and social benefits for the City.

- 1.7 This Planning and Affordable Housing Statement offers a comprehensive assessment of the proposed development against the Development Plan policies and establishes that the proposed development accords with all National and Local Planning Policy. Accordingly, planning permission should be granted for these proposals without delay.

2. INTRODUCTION

2.1 This Planning and Affordable Housing Statement has been prepared by Iceni on behalf of REAP 3 Limited in support of a planning application for full planning permission for the development at Plots 4 and 5, Central Square, City Centre, Cardiff ("the Site")

2.2 This application seeks full planning permission for the following description of development:

"Mixed-use development to provide residential accommodation, flexible non-residential uses, cycle parking, landscaping and other associated works"

2.3 The purpose of this Statement is to provide Cardiff Council ("the Council") with an overall summary of the existing Site and surroundings; the relevant planning history for the Site and to provide justification for the proposed development in the context of Cardiff's Development Plan and national planning policies.

2.4 Furthermore, this Statement demonstrates that the scheme detailed in this planning application offers a wide range of significant planning benefits, including:

- A scheme which is fully aligned with Wales' placemaking objectives to deliver sustainable development through, economic, social, environmental and cultural benefits.
- The optimisation of an underutilised brownfield site to deliver 528 much needed new Build-to-Rent ('BTR') homes in a highly sustainable city centre location, within an area undergoing significant regeneration. This significant housing contribution will help the Council to meet local and regional housing need, positively planning for future housing growth and thus directly addressing the Council's ambitious housing targets of delivering 41,415 new dwellings between 2006-2026.
- The delivery of an iconic new landmark building for Cardiff and Wales. The delivery of the proposed development will play a significant positive role in the ongoing Central Square regeneration process, acting as a catalyst for future investment within the City Centre, and reinforcing Cardiff's status as an internationally important City.
- The delivery of a new building of the highest standard of design and residential quality. The Applicant's 'amenity-led' approach will deliver an exemplary internal and external amenity offering to residents, creating a sense of community and fostering social interaction. The proposed development will result in 5.4sqm of amenity space per home, significantly above that

proposed in the extant permission on the Site (2.5sqm per home), and setting a new standard for the BTR industry.

- The provision of 601sqm of flexible commercial floorspace, including the delivery of a new high-quality pavilion building that can accommodate a new restaurant offer, facilitate active frontages, and provide vibrant city centre uses within this strategically important location.
- A car free scheme with extensive cycle parking facilities, including a publicly accessible bike hub and public cycle parking provision within Central Square, encouraging sustainable transport for all future residents and visitors to the City Centre. The provision of a bike hub in Central Square has been a long-term ambition of the Council's and represents a significant planning benefit of the proposed development. The bike hub will also include a workshop facility and cafe offering, which will be accessible to residents and members of the public and will therefore play a key role in activating Central Square.
- As part of pre-application engagement with the Council, the Applicant have confirmed their commitment to working with the Council to re-brand Central Square as 'Eisteddfod Square'. As part of this process, the detailed architectural and landscape design will utilise all opportunities to incorporate cultural references to Eisteddfod, creating a new public space of national cultural significance.
- The landscape design will significantly increase biodiversity and urban greening on the Site through a carefully considered landscaping and planting strategy. The landscape design will also incorporate a wide range of sustainable drainage interventions that will help control drainage from the Site.
- New buildings which have sustainability at their core, with a wide range of sustainable design and construction measures incorporated within the proposed design and an all-electric energy performance designed to meet modern standards.

2.5 This Report also includes an Affordable Housing Statement with associated analysis, located within Chapter 6 of this Statement.

The Applicant

2.6 REAP 3 Limited is a subsidiary of BlueCastle Capital ('BlueCastle'). BlueCastle has an established heritage in the UK residential real estate sector, with a highly experienced team spanning the critical disciplines of development, construction, finance, and operations. This long-standing involvement in the industry positions BlueCastle as one of the most well-suited developers and operators of Build-to-Rent ("BTR") assets in the UK.

- 2.7 BlueCastle is structured to design, build, and operate its assets over the long term, making them a highly desirable and committed partner for developments. Their focus on quality, longevity, and operational excellence ensures that they remain dedicated to the success of each project well beyond completion.
- 2.8 Currently, BlueCastle's development pipeline includes approximately 1,700 BTR units, targeting strategically well-located sites with strong occupier demand. This approach demonstrates their long-term commitment to delivering high-quality, sustainable residential schemes in the most exciting cities with the UK.
- 2.9 BlueCastle's aspiration for the Site is to provide a residential development of exemplar quality, with a key component being the provision of a variety of different types of high-quality amenity space. BlueCastle will manage and deliver the construction phase and then will continue to manage the building once complete. BlueCastle has an enduring commitment rooted in community and sustainability. With a focus on the long-term, they prioritise resident well-being through innovative and environmentally conscious design. This approach fosters positive outcomes for residents, communities, and the environment. From carbon resilience initiatives to creating social value, BlueCastle are dedicated to positive change in every aspect of their communities.

Submission documents

- 2.10 The following documents and drawings have been prepared and submitted in support of this planning application:

Table 2.1 Planning Submission Documents

Document Title	Consultant
Planning Documents	
Planning Application Forms	Iceni Projects
Land Ownership Certificates	Iceni Projects
Planning Statement (including Affordable Housing Statement and Draft S106 Heads of Terms)	Iceni Projects
Architectural Documents	
Location Plan	5Plus Architects
Site Plan	5Plus Architects
Existing Floor Plans and Elevations	5Plus Architects

Proposed Floor Plans, Elevations, Sections, and Roof Plans	5Plus Architects
Landscaping Plans	Layer Studio
Technical Documents	
Design and Access Statement (including Landscaping Strategy)	5Plus Architects
Air Quality Assessment	Cass Allen
Arboricultural Impact Assessment	WSP
Outline Construction and Environmental Management Plan	WSP
Daylight and Sunlight Report	Development and Light
Drainage Strategy	WSP
Economic Benefits Assessment	Iceni Projects
Energy and Sustainability Statement	WSP
Fire Safety Strategy	Artec
Flood Consequences Assessment	WSP
Green Infrastructure Statement	Layer Studio
Phase 1 Ground Conditions Desk Study	WSP
Pre-Planning Social Value Forecast	Rider Levett Bucknall
Noise Impact Assessment	WSP
Preliminary Ecological Appraisal	WSP
Pre-Application Consultation Report (to follow)	Iceni Projects
Townscape, Heritage and Visual Impact Assessment	Iceni Projects
Transport Statement	WSP
Framework Travel Plan	WSP
Wind Microclimate Assessment Report	GIA

3. APPLICATION SITE AND BACKGROUND

Site Description

- 3.1 The Site comprises a rectangular plot of land extending an area of approximately 0.21ha. The red line boundary also incorporates two smaller parcels of land located further to the east.
- 3.2 The Site is located in Central Square, to the north of Wood Street. The Site is brownfield land and contains no built structures. It is currently bound by hoarding and is not in use or accessible by the public.
- 3.3 Within the immediate context, the Site sits within the Cardiff Central Square Masterplan area. Whilst this masterplan was never formally adopted, it has catalysed significant development, and the prevailing building heights range between 7 to 25 storeys. Directly to the north of the Site is 6 Park Street, occupied by Media Wales. To the north-east and east is 6 Central Square, which was granted planning permission (ref. 17/01751/MJR) in September 2017 for a 12 storey office building, currently occupied by HMRC. To the west of the Site is Scott Road, and further west is Stadium Plaza. To the south is Wood Street, with 3 Central Square further south, occupied by BBC Cymru Wales. 3 Central Square was originally granted planning permission (ref. 14/02405/MJR) in August 2015.
- 3.4 The Site is very well connected by public transport, with Cardiff Central Station within a short walking distance (0.1 miles / 2-minutes' walk), providing connections to Newport in 13 minutes and Cheltenham Spa in approximately an hour. Adjacent to the Site is Wood Street bus stop, with further bus stops along St Mary Street, approximately 2-minutes' walk from the Site.
- 3.5 The Site is not within a Conservation Area and does not include any Listed Buildings. The Natural Resources Wales ('NRW') Flood Map for Planning ('FMfP') identifies the Site to be at risk of flooding and falls into Flood Zone 3 (Rivers and Sea) (albeit located in a 'TAN15 defended zone')

Planning History

- 3.6 The Site benefits from planning permission 21/02984/MJR for a 35-storey mixed-use building, providing non-residential floorspace at lower levels and residential accommodation above, as well as a new standalone 'pavilion' building and other works. Planning permission was granted planning on 2nd May 2024 and is referred to as the 'the Extant Permission' throughout this Statement.
- 3.7 The Extant Permission comprises 332 residential flats (Class C3) and 32 serviced apartments (Class C6). The non-residential floorspace includes 199sqm within the main building at ground level, together with 539sqm within the pavilion building. Other works approved under the permission

included public realm works between the main building and the pavilion, cycle parking, and other associated infrastructure. The Extant Permission, which has not yet been implemented, has a five-year time limit within which to commence development, taking the permission expiry date until 1st May 2029.

3.8 The planning history for the Site is summarised for reference in Table 3.1 below.

Table 3.1 Summary of Relevant Applications

Application Reference	Description	Status
21/02984/MJR	Full planning application for a mixed-use building providing commercial uses at ground floor/mezzanine level (Use Classes A1/A2/A3/B1/D1/D2) and residential accommodation above (Use Class C3 and including non C3 Use Class residential), a pavilion (Use Classes A1/A2/A3), public realm, cycle parking, access, drainage and other infrastructure works required for the delivery of Central Square Plots 4 and 5 [AMENDED DESCRIPTION]	Approved on 2 nd May 2024.

Surrounding Development Context

3.10 The surrounding development context in Cardiff City Centre includes several significant development sites which have been granted planning permission for residential-led and mixed-use development in recent years. A summary of these developments is set out below.

1 Central Square

3.11 Planning permission was granted on 14th July 2014 for 1 Central Square (ref. 14/00385/DCI), comprising of a 9-storey office development, with basement parking, located approximately 90m to the south-west of the Site. Following the original grant of planning permission, a Section 73 permission was granted in March 2016 in order to amend the ramp access (ref. 15/00331/MJR).

3.12 1 Central Square was the first plot of the Masterplan area and applied a holistic approach to the development, encouraging future development within the masterplan and supporting emerging development. The development helped catalyse future development and support redevelopment and regeneration in the area. In addition, the scheme identifies the importance of public realm space,

through promoting linkages between Millennium Walk, the station plaza and Cardiff City Centre's shopping district.

2 and 3 Central Square

- 3.13 To the south of the Site, 3 Central Square comprises an 8-storey building which is occupied by BBC Cymru Wales. The Site was granted planning permission in August 2015 (ref. 14/02405/MJR) for a media centre, alongside retail/café use and office floorspace. Following this, Reserved Matters were granted in May 2016 for 2 Central Square (ref. 16/00708/MJR).
- 3.14 The Site was considered a centrepiece of rejuvenation for the City Centre, including a flagship building for the BBC. The building is surrounded by a new public plaza, designed as a flexible civic centre with the capacity to accommodate a range of events and support active use. This project has been key to the wider regeneration of central Cardiff, playing a significant role in revitalising the area through facilitating economic growth and delivering high-quality design.
- 3.15 2 Central Square comprises an 8-storey office building, fronting Wood Street. On 23rd February 2018, planning permission for a change of use was granted for part of the building, from office to non-residential education (Use Class D1) to enable occupation by a university faculty at ground floor, mezzanine, floor 1 and floor 2 (ref. 16/02931/MJR). The change of use has enhanced the area's provision of both business and employment functions, alongside wider socio-economic benefits in supporting education use.

6 Central Square

- 3.16 Located to the north-east of the Site, 6 Central Square was granted planning permission for a commercial-led 12-storey building on 28th July 2017 (ref. 17/01751/MJR). This commercial-led scheme comprises retail/café use at ground floor and office floorspace above. The project has supported the wider regeneration of Central Square and supports an enhanced office provision, alongside active ground floor uses. The development is seen as a key mechanism to support employment opportunities in the area, with synergies to the existing employment sites within Central Square.

Former Marland House

- 3.17 Located approximately 75m to the south east of the Site, the Former Marland House was originally granted planning permission for a transport interchange, alongside 305 residential apartments and office floorspace, on 30th July 2019 (ref. 18/01705/MJR). In addition, the site includes a 249-space car park, alongside public realm works. The Transport Interchange comprises a 14-stand bus interchange with associated concourse and ancillary retail unit. In addition, the development comprises of two blocks. The first block is a 6-storey office block, fronting Saunders Road and the second block comprises a residential, 24-storey block to the north of the site. The residential component of the scheme comprises BTR accommodation.

-
- 3.18 Following the original grant of planning permission, a Section 73 permission was granted on 16th October 2019 (ref. 19/02140/MJR) to amend the internal configurations, alongside minor alterations to the elevations, which enabled an increase in 13 apartments. The development identifies the promotion of residential use in the City Centre and the importance of promoting mixed use spaces to allow residents to have sustainable access to facilities, services and job opportunities.
- 3.19 In addition, planning permission was granted on 20th March 2020 for an additional 2 office floors, alongside the removal of a retail unit in order to enlarge the office reception (ref. 10/03052/MJR).

Guildford Crescent

- 3.20 Located approximately 700m to the east of the Site, at 1-6 Guildford Crescent, planning permission was granted on 12th November 2021 for a 30-storey, residential-led development (ref. 21/01682/MJR). The permission includes 272 BTR homes, alongside flexible commercial floorspace at ground floor. Following the grant of planning permission, an application to vary the permission was submitted in August 2023 to remove window transoms, include louvres and concrete panels to Level 1 and 2 windows, amend the size of the commercial unit, reconfigure the first floor roof terrace and introduce an access door at level 1. Planning permission was granted on 3rd February 2025 (ref. 23/01925/VAR).

Landore Court

- 3.21 Another notable approved development is the planning permission granted on 21st May 2020 at Landore Court, located approximately 600m to the east of the Site (ref. 19/02464/MJR). The planning permission comprises 150 residential apartments, delivered as BTR, alongside ground floor commercial units.

Pre-Application Discussions

- 3.22 Prior to the formal submission of the planning application for the Site, the Applicant has engaged in three pre-application meetings with the Council on 30th January 2025, 8th April 2025 and 16th July 2025. These discussions, and the feedback from Planning Officers, have been key in shaping the design, scale and layout of the scheme, as well as addressing the Council's wider aspirations.
- 3.23 The pre-application process has been highly constructive and collaborative, and the proposals have evolved in response to the feedback received, as outlined in the Design and Access Statement, prepared by 5Plus, and this Planning and Affordable Housing Statement.
- 3.24 A summary of the key pre-application feedback is set out below, taking each of the planning topics in turn.

Principle of Residential-led Development

- 3.25 Pre-application discussions considered and built upon the approved concept of a residential-led development on the Site, whilst exploring amendments to the Extant Permission to create a more efficient, higher quality scheme that would better align with the Applicant's model and opportunities to optimise the site. During discussions, Officers supported the delivery of an optimised residential-led redevelopment of the Site through a new full planning application, emphasising the evolving development context of the City Centre and the strategic importance of the Site.
- 3.26 The Council accepted the principle of BTR as a suitable housing model for Site, reflecting other nearby planning permissions. This model was seen as an appropriate response to the housing needs of the area, aligning with the Council's objectives for providing a mix of housing types in the City Centre. As such, the principle of an optimised residential-led development was welcomed and strongly supported in the context of the policy position of the Site.

Non-Residential Uses

- 3.27 Throughout pre-application discussions, Officers supported the principle of non-residential uses within the proposed development and emphasised the need to maximise active frontages within Central Square where possible.
- 3.28 Officers supported the re-provision of the pavilion, in line with the Extant Permission, and confirmed the importance of providing a high-quality food and beverage offering within Central Square.
- 3.29 Officers also strongly supported the incorporation of a publicly accessible bike hub within the scheme and recognised the further positive impact which incorporating a cafe element could have in activating Central Square.

Height, Massing and Design

- 3.30 The principle of a tall building to the Site was supported, given the City Centre location, extant permission and proximity to other emerging developments., as well as contributions towards the Council's objectives for growth.
- 3.31 In addition, the Council supported an increase of height on the Site, in order to optimise housing delivery and create a new landmark building for Cardiff. Officers emphasised the importance of design quality, architectural detailing, and the building's silhouette.
- 3.32 The design of the proposed development was a key topic of discussion throughout the pre-application process. The Council provided constructive advice throughout and outlined the importance of quality and boldness to align with the prominent City Centre location and enhancing the local context. The Council welcomed the confident design approach and identified a number of

opportunities for the Applicant's team to review the proposed colour, materials palette, and architectural detailing.

- 3.33 Other aspects of the design, such as the panelling were positively received. In particular, Officers supported the lighting strategy within the pinnacle in order to enhance the proposals and celebrate the strategic importance of the Site.

Pre-Application Consultation

- 3.34 By virtue of its scale, the proposed development constitutes "major development" and will therefore be required to undertake Pre-Application Consultation ("PAC"), which will run for 28 days. In accordance with the statutory requirements, the planning application will be supported by a Pre-Application Consultation Report, prepared by Iceni, which will summarise the consultation process and the matters raised.

4. PROPOSED DEVELOPMENT

4.1 This planning application seeks full planning permission for the following:

“Mixed-use development to provide residential accommodation, flexible non-residential uses, cycle parking, landscaping and other associated works”

4.2 Specifically, this planning application seeks full planning permission for the following:

- A new 50 storey building to be delivered on the Site, with a maximum height of 177.85m AOD.
- The provision of 528 new homes across the Site, which will be provided as a mix of 1 and 2-bedroom BTR homes (Class C3).
- The provision of 2,856.5sqm shared internal and external residential amenity spaces comprising the provision of roof terraces, lounges, coworking areas, a spa and other wellbeing facilities.
- The provision of 164sqm of non-residential floorspace at ground floor of the tower, to be delivered as a bike hub and café (Sui Generis).
- A basement level providing ancillary residential floorspace.
- A pavilion building within Central Square comprising up to 601sqm of flexible non-residential floorspace (flexible Class A1 and A3).
- A car free development with 528 cycle parking spaces.
- 52 visitor cycle spaces accessible to members of the public, provided as Sheffield stands within Central Square.
- All other associated works including plant, refuse storage and other infrastructure necessary at basement level to serve the new development.

Land Use Area Schedule

4.3 The proposed floor areas are summarised in Table 4.1 below.

Table 4.1 Proposed Area Schedule

Use Class	Existing (sqm) (GIA)	Proposed (sqm) (GIA)	Total
Class A1 and A3 - Flexible Non-residential	0	601	601
Class C3 – Residential	0	44,902	44,902
Sui Generis – Bike Hub		164	164
TOTAL	0	45,667	45,667

Housing Mix

- 4.4 The proposed development would comprise 528 new homes with a mix incorporating 65% 1-bed homes and 35% 2-bed homes. A breakdown of the housing mix is set out in Table 4.2 below:

Table 4.2 Proposed Housing Mix

Bedrooms	Total
1 bedroom	344
2 bedrooms	184
TOTAL	528

Amenity Space

- 4.5 The building will provide 431.5sqm of communal external roof terrace, accessible by all residents of the building.
- 4.6 The scheme also proposes 2,425.1sqm of internal shared amenity spaces, including lounges, co-working areas, a spa, and other wellbeing facilities.

Pavillion Building

- 4.7 The proposed development would provide 601sqm GIA of Class A1 and A3 non-residential floorspace, to be delivered as a standalone pavilion within the public realm of Central Square. The pavilion is proposed to be two storeys tall, with an upper floor which provide publicly accessible terraces that can be used for outdoor seating and views of the public realm.

Access, Servicing and Parking

Car Parking

- 4.8 The proposed development would be entirely car-free.

Cycle Parking

- 4.9 The proposed development would provide 528 secure cycle parking spaces at ground and mezzanine level. The proposals provide an additional 52 external cycle parking spaces, delivered within the public realm of Central Square.

Access Provision

- 4.10 Vehicular access to the Site is restricted to service and delivery vehicles, which would be taken from Scott Road, to the west of the Site. The proposed servicing and delivery provision would be undertaken via a collection bay, directly adjacent to the indoor bin store.

Refuse

- 4.11 The proposed development incorporates 60 no. 1100 litre bins to service the residential development, within a refuse store at ground floor level which presents access to the servicing yard. A separate refuse store for the non-residential use is also proposed. To meet the anticipated volume of refuse, private refuse collection would supplement Council refuse collections.

5. PLANNING POLICY

5.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.2 This section identifies the principal planning policy considerations which have informed the development proposals, and which provide the context for the consideration of the planning application, as well as other material considerations. The current development plan consists of:

- Future Wales 2040: The National Plan (2021)
- Cardiff Local Development Plan 2006-2026 (2016).
- Proposals Map (2016)
- Constraints Map (2016)

Future Wales 2040: The National Plan

5.3 Future Wales 2040: The National Plan is ('the National Plan') sets out the national framework for Wales and the direction of development to 2040. It divides Wales into four regions, whereby Cardiff is located within the South Eastern region.

5.4 The South Eastern region includes an overarching aim to sustain and develop a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and wellbeing of communities. In addition, Cardiff is identified within the South East region as a 'National Growth Area' that will be the main focus for growth and investment in the South East region. Cardiff remains the primary settlement in the region and will accommodate higher level functions and attractions.

Cardiff Local Development Plan

5.5 The Cardiff Local Development Plan sets out the spatial strategy and the vision for Cardiff and was formally adopted January 2016.

5.6 The Council's Proposals Map and Constraints Map identifies the Site as falling within the following policy designations:

- Cardiff Central Enterprise Zone and Regional Transport Hub.

-
- Central and Bay Business Area.

5.7 In addition to the above, the following policies are relevant to the proposals:

- KP1 – Level of Growth
- KP2 – Strategic Sites
- KP2 (A) - Cardiff Central Enterprise Zone and Regional Transport Hub
- KP5 – Good Quality and Sustainable Design
- KP6 – New Infrastructure
- KP7 – Planning Obligations
- KP8 – Sustainable Transport
- KP10 – Central and Bay Business Areas
- KP12 – Waste
- KP13 – Responding to Evidenced Social Needs
- KP14 – Healthy Living
- KP15 – Climate Change
- KP16 – Green Infrastructure
- KP17 – Built Heritage
- KP18 – Natural Resources
- H3 – Affordable Housing
- EN8 – Trees, Woodlands and Hedgerows
- EN10 – Water Sensitive Design
- EN11 – Protection of Water Resources
- EN12 – Renewable Energy and Low Carbon Technologies
- EN13 – Air, Noise, Light Pollution and Land Contamination

-
- EN14 – Flood Risk
 - T1 – Walking and Cycling
 - T5 – Managing Transport Impacts
 - T6 – Impact on Transport Networks and Services
 - R1 – Retail Hierarchy
 - R6 – Retail Development (Out of Centre)
 - R7 – Retail Provision within Strategic Sites
 - R8 – Food and Drink Use
 - C3 – Community Safety/ Creating Safe Environments
 - C5 – Provision for Open Space, Outdoor Recreation, Children’s Play and Sport
 - C6: Health

Emerging Local Plan

5.8 In addition, the Council are currently in the process of preparing a new Local Plan. Consultation on the strategic options paper ran from November to February 2022. Consultation of the Preferred Strategy and Candidate Sites took place from July to October 2023. More recently, consultation on the Deposit Plan took place from 18th February 2025 to 15 April 2025. Accordingly, these policies carry limited/moderate (delete as applicable) weight in the assessment of planning applications.

5.9 Within the Deposit Plan, the following draft policies are relevant to the proposal:

- SP1 – Providing for Sustainable Growth
- SP4 – Securing Good Quality and Sustainable Design
- SP5 – Securing New Infrastructure
- SP6 – Securing Planning Obligations
- SP8 – Supporting the Central and Bay Business Area
- SP12 – Delivering Sustainable Neighbourhoods, Social Cohesion and Affordable Housing
- SP13 – Securing Health and Wellbeing and Resilience

-
- SP14 – Protecting and Enhancing Built Heritage and Culture
 - SP15 – Securing and Enhancing Opportunities to Grow the Welsh Language
 - SP18 – Delivering Sustainable Transport and Active Travel
 - SP20 – Securing Climate Resilience, De-Carbonisation and Renewable Energy in New Developments
 - SP21 – Maintaining and Enhancing Green Infrastructure and Biodiversity
 - SP23 – Managing Waste
 - H3 – Affordable Housing
 - EC1 – Cardiff Central Enterprise Zone and Regional Transport Hub
 - EC10 – Night-Time and Cultural Economy
 - D1 – Tall Buildings
 - R1 – Retail Hierarchy and Town Centre First Approach
 - R6 – Town Centre First Approach
 - R8 – Food and Drink Uses
 - C3 – Community Safety/ Creating Safe Environments
 - HE1 – The Historic Environment
 - HF1 – Health, Wellbeing and Development
 - WL1 – Welsh Language
 - BG4 – Net Benefits for Biodiversity and the Green Infrastructure Statement
 - BG5 – Trees, Woodlands and Hedgerows
 - T1 – Prioritising Walking and Cycling
 - T4 – Managing Transport Impacts
 - OS2 – Provision for Open Space, Outdoor Recreation, Children’s Play and Sport
 - RE2 – Net Zero Development

-
- W1 – Water Sensitive Design
 - W2 – Protection of Water Resources
 - W3 – Flood Risk
 - PC1 – Air, Noise, Light Pollution and Land Contamination
 - MW9 – Provision for Waste Management Facilities in Development

Supplementary Planning Documents

5.10 There are also a number of supplementary planning documents and guidance (SPDs / SPGs) which form material considerations for this application:

- Planning Policy Wales (Edition 12) (February 2024)
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July 2020)
- Technical Advice Note (TAN) 2: Planning and Affordable Housing (June 2006)
- Technical Advice Note (TAN) 4: Retail and Commercial Development (November 2016)
- Technical Advice Note (TAN) 11: Noise (October 1997)
- Technical Advice Note (TAN) 12: Design (March 2016)
- Technical Advice Note (TAN) 18: Transport (March 2007)
- Planning Obligations SPG (January 2017)
- Residential Design Guide (January 2017)
- Tall Buildings SPG (January 2017)
- Food, Drink and Leisure Uses (November 2017)
- Residential Design Guide (January 2017)
- Managing Transportation Impacts (Incorporating Parking Standards) (July 2018)

6. PLANNING ANALYSIS

- 6.1 This section reviews the key planning considerations arising from the proposed development. It provides a reasoned justification for the proposed development in the context of relevant policy and the specifics of the Site and its surroundings.

Principle of Development

- 6.2 The National Plan sets out the government's overarching development plan and places a strong emphasis on development to improve the economic, social, environmental and cultural well-being of Wales. The National Plan recognises Cardiff as a pivotal location within the South East region and National Growth Area.
- 6.3 Policy 1 recognises the importance of Regional Growth Areas, including Cardiff, in order to grow and deliver employment and housing opportunities.
- 6.4 Policy 33 outlines Cardiff, Newport and the Valleys as the main focus areas for growth and investment in the South East region. The Policy outlines the importance of these locations as the focus for strategic economic and housing growth, essential services and facilities, advanced manufacturing, transport and digital infrastructure.
- 6.5 Planning Policy Wales ('PPW') outlines the importance in prioritising the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development. The Government highlights that brownfield land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.
- 6.6 The Cardiff Local Development Plan ('Local Plan') provides the local framework for development, with specific policies supporting both housing delivery, strategic sites and retail provision.
- 6.7 Local Plan Policy KP1 sets out the target for 45,415 new homes to be delivered over the plan period (including a 4,000 home flexibility allowance) in order to deliver the housing requirement of 41,415 new homes and 40,000 new jobs between 2006-2026.
- 6.8 Local Plan Policy KP2(A) allocates land within Cardiff Central Enterprise Zone, including for mixed uses in Cardiff City Centre, in order to fulfil Cardiff's role and maximise the advantages of its central location. The Policy encourages creating destination spaces and supports densities being maximised in order to make efficient use of city centre land, whereby high-rise, high-density developments at appropriate locations are encouraged. Residential densities in excess of 100 dwellings per hectare are not considered unreasonable in principle.

-
- 6.9 Residential development in this location is also further encouraged in Local Plan Policy KP10, which supports offices, residential and commercial leisure uses within the Central and Bay Business Areas.
- 6.10 In addition, draft Policy SP1 within the emerging Deposit Plan sets out the updated housing needs for the emerging plan period, making provision for 26,400 (including a 10% flexibility allowance) dwellings and 32,300 new jobs over the plan period. Within the draft Policies Map, the Site is acknowledged as a Housing Commitment, to deliver over 100 dwellings.
- 6.11 Draft Policy SP8 supports residential use within the Central and Bay Business Area above ground floor and where it does not result in the loss of ground floor commercial use.
- 6.12 Draft Policy EC1 identifies the future strategy for Cardiff Central Enterprise Zone and Regional Transport Hub, promoting a focus on knowledge-based business and supporting, as part of an integrated regional public transport hub, high density residential units together with a diversity of complementary mixed uses.
- 6.13 Draft Policy H9 sets out that the Council will permit the redevelopment of redundant, previously developed land where there is no overriding need to retain the existing use of the land or premises and no overriding alternative local land use requirement; the resulting residential accommodation and amenity will be satisfactory; there will be no unacceptable impact on the operating conditions of existing businesses; necessary community and transportation facilities are accessible or can be readily provided or improved it can be demonstrated that the change of use has been assessed in terms of land contamination risk and that there are no unacceptable risks to the end users; and the resulting residential accommodation is accessible by walking, cycling or public transport.
- 6.14 The Site benefits from the Extant Permission, which includes the delivery of 332 residential homes and establishes the principle of residential-led development at the Site.
- 6.15 Furthermore, national and local policy emphasises the importance of delivering housing in Cardiff, within key strategic locations. As detailed in Chapter 3, the principle of residential development is well established within the local context and the central location of this Site is suited to high density, residential use, which is well served by transport links and is close to local amenities.
- 6.16 The National Plan and Local Plan place an emphasis on boosting housing supply within Cardiff. The Site is located within Cardiff Central Enterprise Zone, and is considered a strategic location for economic development, mixed-use development and high-density residential development. The principle of development therefore aligns with National Policy 1 and 33, alongside Local Plan Policy KP1 and KP2(A), in order to support optimised housing delivery in a strategically important location.

-
- 6.17 The principle of development is also supported in emerging planning policy, through the draft policies within the Deposit Plan which support the focus on residential-led mixed-use development in this area. As set out above, the principle of residential development has been established on the Site, and in the surrounding area, and as such there is no overriding need to deliver alternative uses. In accordance with draft Policy H9, the subsequent sections of this Chapter identify how the proposals accord with policy and ensure that the proposals would provide a valuable contribution to the development of the City Centre.
- 6.18 Given the strategic importance of the Site, the proposed development provides the opportunity to make a significant positive contribution to the ongoing regeneration of Cardiff and optimise development on sustainably located brownfield land. The proposed development would build upon the positive principles established through the Extant Permission and the successful ongoing regeneration of the wider Central Square area, delivering homes to meet local housing need and further optimise development, as encouraged by local and national policy.

Non-Residential Use

- 6.19 Local Plan Policy KP2(A) allocates land within Cardiff Central Enterprise Zone, including mixed uses in Cardiff City Centre, in order to fulfil Cardiff's role and maximise the advantages of its central location.
- 6.20 In accordance with TAN 4, Policy R1 applies a retail hierarchy to new retail proposals, which comprises the Central Shopping Area ('CSA') at the head of the regional hierarchy, supported by a range of district centres and smaller local centres.
- 6.21 Policy R6 seeks to direct retail uses to the City Centre and other designated centres; however, this policy identifies that locations outside of these centres would be considered appropriate where they support the vitality, attractiveness and viability of designated centres. This approach is supported in draft Policies R1 and R6 within the Deposit Plan.
- 6.22 Moreover, Local Plan Policy R8 outlines that food and drink uses are better located in designated centres where they can complement and enhance the existing context, including the City Centre (Central Business Area).
- 6.23 Draft Policy SP4 outlines the importance of providing mixed use, sustainable neighbourhoods in order to secure good quality and sustainable design. This includes maintaining a mix of mutually supportive neighbourhood uses close to residential dwellings. Moreover, draft Policy EC10 encourages proposals for leisure, entertainment, and cultural uses that protect, promote, diversify, and revitalise the city's evening and night-time economy in the Central Business Area. Draft Policy EC1 identifies the focus of the Cardiff Central Enterprise Zone as a hub for high density residential units together with a diversity of complementary mix of uses.

-
- 6.24 The Extant Permission included a variety of flexible non-residential floorspace. Paragraph 10.7 of the Committee Report identifies the contribution that Class A3 uses, such as restaurants, cafes and snack bars provide towards the range and choice of facilities available in the Central Business Area. In this regard, it was outlined by Officers that the non-residential uses would contribute towards the creation of different uses and active frontages both within and around the new public square at Wood Street. As such, the Extant Permission establishes the principle of non-residential use at the Site in order to enhance activity within the Central Square area.
- 6.25 Whilst the Site is not located within the retail hierarchy, the proposed flexible, non-residential use would support a mix of uses within the Site, providing active and vibrant uses at ground floor and within the public realm. The proposals would promote a lively streetscape that be used throughout the day, providing uses that complement the local context and build upon the success of the wider Central Square area, delivering active ground floor uses and supporting a vibrant public realm in accordance with Local Plan Policy KP2(A) and draft Deposit Plan Policy EC1.
- 6.26 In addition, the proposed publicly-accessible bike hub will seek to deliver a state-of-the-art facility in order to encourage sustainable transport for all future residents, as well as people who both visit and work in the City Centre. The provision of a bike hub in Central Square has been a long-term ambition of the Council's and represents a significant planning benefit of the proposed development. The bike hub will also include a workshop facility and cafe offering, which will be accessible to residents and members of the public. The bike hub will therefore play a key role in activating Central Square.

Summary

- 6.27 Overall, the provision of this residential-led development and the delivery of 528 new homes fully accords with all policy objectives and is fully compliant with the existing and emerging local plan and the National Plan.
- 6.28 The proposals also seek to deliver high-quality, non-residential floorspace that activates the public realm and provides vibrant town centre uses. The proposed development addresses the strategic need for new housing in Cardiff, supports the regeneration of Central Square, and would make efficient use of previously developed land and provide non-residential retail and food and beverage offers to activate the street frontage. Therefore, the principle of the proposed development should be considered acceptable.

Housing Mix and Affordable Housing Statement

- 6.29 The National Development Plan and PPW seek to enhance the opportunities of growth and regeneration of towns and cities in order to positively contribute to building sustainable places. Therein, Policy 2 of the National Development Plan outlines that regeneration should provide a variety housing types and tenures, to establish places that cater for varied lifestyles.

-
- 6.30 At a local level, Local Plan Policy KP13 supports delivering a range of dwelling sizes and types in order to promote sustainable communities. Supporting Paragraph 4.151 sets out that average household sizes have been declining, which has been reflected in the increased proportion of 1- and 2-bedroom flats in consented residential schemes.
- 6.31 Furthermore, draft Policy SP12 supports adopted policy, outlining the importance of providing a range of dwelling sizes, tenures, types and locations that meet the full range of housing needs.
- 6.32 In addition, Local Plan Policy KP2 (A) and draft Policy EC1 set out the strategy for Cardiff Central Enterprise Zone and Regional Transport Hub, which includes the integration of high-density residential units and takes advantage of the central location to make efficient use of land.
- 6.33 The proposed development would make a significant contribution towards housing delivery and comprises 528 homes. The housing mix, comprising 344 (65%) one-bedroom homes and 184 (35%) two-bedroom homes, has been tailored to support sustainable development within Cardiff City Centre, where higher-density living and flatted accommodation is encouraged. The predominance of smaller units aligns with the role of the City Centre as a future hub for smaller households, who would be attracted to the area by employment opportunities and excellent public transport links. This mix supports the broader objectives of regeneration within the area and associated Local Plan policies by increasing the population density and contributing to the vitality of the area.
- 6.34 By providing one-bedroom homes, the development would contribute to the diversity of the housing stock in Cardiff, which is essential for creating inclusive and sustainable communities. The inclusion of 184 two-bedroom homes ensures that the development provides suitable housing for small families, couples and sharers looking for additional space.
- 6.35 Therefore, the proposed housing mix aligns with the National and Local Policy. It directly responds to the housing needs identified for Cardiff and the City Centre, particularly the demand for smaller homes and high density living. It would also contribute to the creation of a sustainable, vibrant, and diverse community in the City Centre. Furthermore, the proposed mix was supported by officers at pre-application stage, therefore, the housing mix should be considered acceptable in policy-terms.

Affordable Housing Statement

- 6.36 The National Development Plan, Policy 7 outlines that the Government will seek to increase the delivery of affordable homes, whereby supporting text identifies the importance of affordable housing provision to meet the identified housing need in Wales.
- 6.37 Local Plan Policy KP13 outlines the need to provide a range of affordability, setting out Cardiff's target to provide 6,646 affordable dwellings over the Plan period.

-
- 6.38 Local Plan Policy H3 seeks to provide 20% affordable housing on brownfield sites that contain 5 or more dwellings and sites of or exceeding 0.1 hectares. In addition, the Council will seek 20% affordable housing on brownfield land where adjacent and related residential proposals result in combined numbers or size areas exceeding these thresholds. Affordable housing will be sought to be delivered on-site in all instances unless there are exceptional circumstances. This is supported in draft Policy H3.
- 6.39 The Financial Viability Assessment, prepared by Montagu Evans and submitted in support of this application, concludes that the proposed development is unable to viably support 20% affordable housing. Despite this position, the proposed scheme as assessed would be profitable and deliverable, albeit at margins that the Applicant's consultants consider to be sub-market. The Applicant is fully committed to the delivery of the proposed development and to secure any necessary planning obligations which would be agreed through discussions with officers during the course of the application. Any contributions will be secured through a Section 106 Agreement as appropriate.

Residential Quality

- 6.40 Local Plan policy KP5 requires new development to respond to the local character and context and ensure the layout, scale, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage are all addressed within development proposals. This includes fostering inclusive design that is accessible to all users and adaptable to future changes in lifestyles.
- 6.41 Wales's Technical Advice Note ('TAN') 12 'Design' promotes high quality, sustainable design in order to place people at the heart of the design process. TAN12 recognises the potential for innovative solutions for high density, and the potential for high density living in urban regeneration areas, in order to help reduce the need to travel, revitalise and regenerate urban centres and reduce pressure for development on the countryside.
- 6.42 Additionally, the Cardiff Design Guide highlights that homes should be well designed and exhibit architectural quality, including through provision of enough room to accommodate its occupants and their lifestyles in comfort.
- 6.43 The proposed development would deliver generous internal space for new dwellings and provide residents with a high quality of accommodation, in accordance with Welsh Development Quality Requirements and the Welsh Housing Quality Standard. The accompanying Design and Access Statement, prepared by 5Plus Architects, highlights the quality of internal design and layout of the proposals, in accordance with the National Standards.
- 6.44 The design of the new homes also ensures access to natural light. Internally, approximately 97% of rooms assessed within the proposed development would meet recommended daylight targets,

subject to appropriate internal wall design.. Shortfalls are primarily in rooms with a northern outlook that fall short of the recommended threshold. However, even for these homes, there is availability of shared outdoor spaces, such as roof terraces.

- 6.45 The accompanying Daylight and Sunlight Report, prepared by Development and Light and submitted in support of this application sets out that 82-97% rooms achieve BRE compliance on daylight, 53% achieve BRE compliance on sunlight. The assessment emphasises that in a city centre location with a rapidly evolving context, there is a lesser expectation for natural Daylight & Sunlight amenity than elsewhere and the BRE allows some flexibility in this regard. Therefore, the performance of the development is considered acceptable, ensuring overall compliance with residential quality standards and that the proposed development would deliver a high quality of residential accommodation.

Internal and External Amenity Space

- 6.46 PPW outlines the importance of enabling the provision of a range of well-designed, energy efficient, good quality homes. Notably, the PPW applies a holistic approach aimed at creating high-quality development that promotes well-being.
- 6.47 Cardiff Residential Design Guide encourages innovated ways of providing outdoor amenity space, alongside well-design shared amenity spaces. For communal gardens, the guidance encourages a minimum area of 75sqm should be provided for up to 5 units with an additional 10m² for each additional unit.
- 6.48 It is noted that Cardiff Residential Design Guide requires balconies for apartments with no direct, safe or convenient access to a communal garden or other suitable public green spaces within their vicinity. The proposed development does not provide a communal garden, however, does include a 431.5sqm private external amenity space within the roof terrace, alongside extensive new public realm landscaping around the buildings, providing accessible external amenity space for residents. In addition, the proposed development includes private inset balconies to be delivered for all dwellings at floors 47 and 48, in order to provide private amenity spaces for these residents. These balconies would measure approximately 9.6sqm.
- 6.49 The Extant Permission includes 894sqm of communal amenity space. This equates to 2.46sqm amenity space per dwelling.
- 6.50 The private external amenity provision across the Site totals 431.5sqm. The roof terraces would offer high-quality, secure outdoor environments that are accessible to all residents, ensuring all residents have access to outdoor space. The proposed development also comprises a significant total of 2,425.1sqm internal amenity space in the form of lounges, coworking, gym and other wellbeing

facilities. The overall internal and external amenity space provision across the Site therefore totals approximately 2,856.6qm. The overall private amenity provision for the 528 homes would therefore equate to 5.41sqm amenity space per dwelling when incorporating both private internal and external amenity. In addition, dwellings at floors 47 and 48 would benefit from balconies in order to provide private, high-quality amenity space.

- 6.51 External amenity space across the Site comprises approximately 431.5sqm across the external roof terrace, alongside approximately 891.6qm of external landscaped public realm surrounding the buildings.
- 6.52 In addition to the on-site communal amenity, the Site is located within close proximity to a number of public open spaces, including Bute Park, which offers additional amenity space for recreation and exercise. The close proximity of public spaces helps to provide accessible open space and promote active use and lifestyles.
- 6.53 The communal internal areas, particularly the spa and co-working spaces, are designed to cater to contemporary requirements, promoting healthy and flexible lifestyles and providing residents with spaces for relaxation, work, socialising, and wellbeing. This aligns with the National and Local Plan emphasis on creating healthy and inclusive communities. The high quality of amenity space provision would foster a sense of community and contribute positively to the overall quality of life, supporting the objectives of Local Plan Policy KP5.
- 6.54 This approach also aligns with TAN 12 and Cardiff Residential Design Guide, which both recognise the role of a high standard of residential living, and innovative solutions, particularly in denser urban environments. The communal spaces are integrated into the design in a way that promotes social interaction, community building, and health, reflecting the broader aims of both national and local policies to create inclusive and vibrant living environments.
- 6.55 The City Centre location, where housing density is encouraged, supports a more flexible approach to private external amenity provision. The development makes efficient use of a constrained brownfield site, which support optimising the use of previously developed land. As such, the proposed development seeks to maximise housing delivery whilst delivering capacity for quality amenity space.
- 6.56 In conclusion, the proposed development provides a high standard of residential amenity, offering a variety of unit types, as well as shared spaces that foster community interaction and support modern living. The design maximises both private and communal amenity spaces, ensuring that future residents would enjoy a high-quality living environment. The development complies with national and local planning policies, particularly Policy KP5, which prioritise good design, housing quality, and the well-being of future occupants.

Design, Height and Massing

Height, Massing and Townscape Impacts

- 6.57 The National Plan supports sustainable growth, including the importance of growth and regeneration that supports placemaking at the heart of the planning system. Policy 2 identifies the key strategic placemaking principles, including increasing density, with development built at urban densities that can support public transport and local facilities.
- 6.58 In addition, the Local Plan and Cardiff Residential Design Guide places a strong emphasis on ensuring developments contribute to distinctiveness. Local Plan Policy KP17 and draft Policy SP14 within the Deposit Plan seek to protect and enhance Cardiff's heritage assets and Local Plan Policy KP5 sets out that development should respond to the local character and context of the building and landscape setting so that layout, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage are all addressed within development proposals. In addition, this policy identifies the importance of locating tall buildings in locations which are highly accessible through walking and public transport, and are within an existing or proposed cluster of tall buildings.
- 6.59 The Tall Buildings SPG outlines the importance of well-designed tall buildings in appropriate locations. The Guidance identifies that attractive tall buildings in clusters can help to signify the core areas of the city, particularly areas within the city centre and wider Cardiff Bay. The Guidance sets out that tall buildings must be appropriately located and have no negative impacts on important views or vistas, not harm the character or setting of heritage, be a positive feature in skyline & streetscape, either by complementing a cluster of tall buildings or forming a strategic landmark, not cause material harm caused by overshadowing or overlooking and be walking and cycling accessibility to sustainable transport and local facilities.
- 6.60 In addition the Tall Buildings SPG sets out that detailed proposals must exhibit exceptional architectural standards: elegance in form, silhouette and quality of materials, maximise activity through ground floors uses and fenestration, provide the highest standards of building performance, safety, inclusivity and adaptability, include exemplary cycle storage, low car parking levels and integrated servicing, recycling and waste storage, prove that the development will not create adverse microclimatic effects and deliver significant enhancements to the public realm.
- 6.61 Deposit Plan draft Policy D1 encourages tall buildings in highly accessible locations in areas where the scale and visibility of a development can be accommodated without adversely compromising an established historic or neighbourhood character. Draft Policy D1 sets out several objectives which tall buildings should consider.
- 6.62 In recent years, there has been significant redevelopment within the local context of the Site. As identified in Section 3, the development proposals sit within the context of the wider regeneration of

the City Centre, which represents a crucial phase in the development of Cardiff, revitalising and modernising the centre. In particular, there has been significant growth in the delivery taller buildings, providing residential development, commercial floorspace and student housing.

- 6.63 The Heritage, Townscape & Visual Impact Assessment ('HTVIA'), prepared by Icen Projects and submitted in support of the application sets out the townscape justification for the height of the proposed development. This Assessment notes that the proposed development, while taller than the surrounding buildings at 50 storeys, acts as a positive visual marker at a key point in the City Centre, contributing to Cardiff's evolving skyline without overpowering the adjacent townscape.
- 6.64 The Townscape and Visual Assessment, within Chapter 7 of the HTVIA, examines 10 verified views within the Borough and notes that the proposed townscape and visual impacts from these viewpoints would present as either minor neutral, moderate neutral, negligible beneficial, minor beneficial or moderate beneficial. When viewed cumulatively alongside other developments coming forward, the impacts would range from minor to moderate beneficial. As such, it is considered that the proposed development would only support the strengthening of the Cardiff skyline, whereby the additional buildings would frame the proposed landmark building, creating a cohesive townscape and iconic skyline.
- 6.65 Overall, the assessment demonstrates that the proposed development, at 50 storeys, would maintain the overall composition and character of the setting of nearby heritage assets and would maintain their significance. The use of high-quality materials further ensures that the development will enhance local aesthetic and architectural value, in line with Local Plan Policy SP5.
- 6.66 Moreover, in accordance with Local Plan policy and the Tall Building SPG, the proposed development is located in a highly sustainable location, whereby the Site is very well connected by public transport, with Cardiff Central Station along side several bus stops and Cardiff Bus Interchange in close proximity. As such, the proposed development seeks to benefit from the highly sustainable location, providing a car-free development, alongside 528 cycle parking spaces within the publicly accessible bike hub and 52 public cycle spaces are provided within the adjacent public realm.
- 6.67 The proposed development seeks to provide a highly sustainable and energy efficient buildings, targeting a minimum EPC rating of B for all apartments and a Net Zero Carbon strategy to be aligned to the UK GBC Net Zero Carbon Pathway and LETI Climate Emergency Design Guide with targeted Energy Use Intensity (EUI) - 35 kWh/m²/yr.
- 6.68 In accordance with draft Policy D1, the development is therefore considered to comply with the criteria included in Table 6.1 below:

Table 6.1 Draft Policy D1

Draft Policy	Proposed Development Response
Do not negatively impact on the character and setting of listed buildings, conservation areas or registered parks and gardens	Chapter 6 of the HTVIA assesses the heritage impacts, identifying that the proposed development is considered to cause no harm to Cardiff Central Railway Station (Grade II), Water Tower at Cardiff Central Station (Grade II), Cardiff Castle (Grade I), Cardiff Castle and Roman Fort (Scheduled Monument) and Cathays Park Conservation Area (including associated designated assets, including the Law Courts (Grade I) and City Hall (Grade I)).
Accommodate a mixture of uses	The proposed development will build upon the success of the wider Central Square area, whereby, alongside the delivery of much needed high-quality homes to address the Council's housing need, the proposed development brings new flexible non-residential floorspace that will activate Central Square, a publicly accessible bike hub and café, and new pavilion building that can accommodate a restaurant.
Achieve attractive, original and distinctive architectural and landscape design quality commensurate with their high visibility in the city and any position in a streetscape.	The development has been designed to be of a high architectural standard to ensure the quality and materiality are exemplary. The design showcases Cardiff and supports the strategic importance of the area, as a gateway to the City, creating a new iconic landmark. In addition, the extensive public realm landscaping in and around the buildings seeks to enhance the streetscape and support the active use at ground floor The Design and Access Statement provides further detail of how the proposed materials, architectural detailing, the proposed colour, and articulation have been used to strengthen the scheme's design quality.
Contribute positively to the overall townscape by providing an elegant silhouette against the sky and in relation to any distinct building group within any relevant vista.	As identified in the HTVIA, the proposed development is of high quality architectural design which is responsive to both the existing and emerging townscape character and appearance. The contextual design positively reinforces the surrounding character and the scale and height maximises the Site's contribution to the city's urban form and image.
Enhance the biodiversity of their site or immediate context, and in particular through the accommodation of trees and green infrastructure.	The Preliminary Ecological Appraisal, prepared by WSP and Green Infrastructure Statement, prepared by Layer Studio, demonstrate how green infrastructure has been integrated into the development in order to enhance the location. In addition, the development proposes an overall Biodiversity Net Benefit through the introduction of new trees, green roofs and extensive public realm planting.
Make a visually seamless connection with the ground plane, integrating with the street scene and neighbouring public realm.	The proposals include new flexible non-residential floorspace in order to activate the ground floor and enhance the wider Central Square area. The proposed development includes a new pavilion, alongside additional non-residential floorspace, in order to support the surrounding street scene.
Take into account the needs of people at the human scale, providing active	The proposed development will build upon the success of the wider Central Square area, providing new flexible non-

commercial or residential interfaces at ground floor on key frontages and creating neighbouring spaces that allow for trade, play, sport or relaxation within an attractive landscape that in particular benefits residents.	residential floorspace that will activate Central Square, including a publicly accessible bike hub and cafe, and a new pavilion building that can accommodate a world class restaurant, together with extensive public realm landscaping. These proposals ensure that the ground floor use and key frontages along Wood Street and in Central Square provides interest and activation.
Provide any refuse, cycle or car parking and building servicing provision in a recessive location where it has limited impact on the vitality and attractiveness of the public realm.	The Transport Assessment and Travel Plan, prepared by WSP, provides details of the refuse, cycle parking and building servicing provision, whereby the location has been designed to ensure that that it does not interface with the key frontages and ground floor uses. The proposed servicing strategy is based on preserving the safety and quality of the public realm and minimising noise and disturbance.
Do not form an overbearing relationship with neighbouring development or compromise the reasonable development of neighbouring sites.	The proposed development maintains the key design principles established through the Extant Permission and will not compromise the reasonable development of neighbouring sites.
Provide reasonable living space and residential amenity for future and existing residents affected by the development in line with policy (SP4) and any relevant SPG standards and guidance related to privacy, ambient light and the provision of both shared or communal amenity space.	The proposed development provides a high standard of residential amenity, offering a variety of unit types, as well as shared spaces that foster community interaction and support modern living. The design maximises both private and communal amenity spaces, ensuring that future residents will enjoy a high-quality living environment.
Demonstrate that the development does not adversely impact on the microclimate of the application site and the surrounding streets and public spaces in relation to sunlight and wind.	The Wind Microclimate Assessment Report concludes that there would be no significant adverse wind effects anticipated as a result of the proposed development. Wind comfort conditions would be suitable for the intended use, or no worse than the baseline conditions for all general thoroughfares and roadways, bus stops, existing off-site building entrances, proposed and existing benches and the proposed roof terrace and balconies
Consider public safety requirements as part of the overall design, including the provision of evacuation routes.	The Fire Safety Strategy, prepared by Artec, provides details of the fire strategy, including the provision of evacuation routes.
Provide an "adaptability statement" to show that the building could accommodate alternative uses, subject to the necessary consents.	The Design and Access Statement identifies the adaptability of the proposals, outlining the opportunities the buildings provides in order to accommodate alternative uses.

-
- 6.91 The proposed development meets both national and local planning policies on tall buildings and townscape impact. The proposed development positively engages with the streetscape through its promotion of an active frontage and its better definition of the Site amongst the street's layout, expressed through its articulated form. The height of the proposed development contributes a source of interest to the townscape which is considered to be in keeping with the regeneration of Central Square and thereby not only improves the Site's architectural quality, but also enhances its contribution to the townscape. Furthermore, the development would optimise the Site capacity in a manner which would not adversely affect visual amenity in the long term. Accordingly, the height and massing of the proposed development aligns with the adopted and emerging Local Plan, the Tall Buildings SPG and the National Plan and thus be considered acceptable.

Design and Materiality

- 6.92 The Local Plan places a strong emphasis on the importance of high-quality design. Policy KP5 sets out clear design expectations, aiming to support and enhance the local environment through high-quality and contextually appropriate design. This policy requires all new development to respond to the local character and context of the building and landscape setting so that layout, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage are all addressed within development proposals.
- 6.93 The Cardiff Design Guide highlights that homes should be well designed and exhibit architectural quality, including through providing enough room to accommodate its occupants and their lifestyles in comfort, provide for inclusive accessibility, be energy efficient, be robust and result in a successful kerb appeal and enhance the appearance of an area.
- 6.94 In addition, Cardiff Residential Design Guide outlines the importance of design in order to enhance and become part of the existing neighbourhood, or help create a distinctive and popular new one. The Guide stresses the importance of contributing and/ or establishing diverse, attractive, safe and used places which will have qualities to help them remain economically, environmentally and socially sustainable.
- 6.95 Deposit Plan draft Policy SP4 seeks to ensure new development is of the highest architectural quality, sustainable design and make a positive contribution to the creation of distinctive and healthy communities, places and spaces. Part i outlines the importance of development being designed to maintain or enhance the character of places and part xiii sets out that design should maintain or enhance the positive, distinctive qualities of places and build in features and take advantage of opportunities provided by a location including heritage, culture and Welsh Language.

-
- 6.96 This is further supported by draft Policies SP15 and WL1 which seek proposals to identify positive measures that enhance the interests of the Welsh language. Policies support new development, where relevant, to promote, protect and strengthen the interests of the Welsh language and the city as an area of linguistic importance.
- 6.97 The approach to design and materiality is set out within the Design and Access Statement, prepared by 5Plus and submitted in support of this application. The proposed development responds to both the national and local policy requirements for high-quality design that responds to the local context.
- 6.98 The proposed development's massing and design has been carefully considered to provide an exemplar standard of urban design which is befitting of a tall, landmark city centre development whilst also responding to the surrounding urban environment. The development has been designed to build upon the success of the wider Central Square area whilst exemplifying the strategic importance of the location, creating a new iconic landmark for Cardiff and Wales.
- 6.99 The proposed design incorporates significant façade articulation, ensuring that the building contributes positively to the townscape. This aligns with Policy KP5 and the Cardiff Design Guide, which requires developments to include high-quality architectural design and quality. The proposed materiality and colours, with a contrasting bronze finish façade, ensures that the development responds well to the local environment and would enhance the architecture in Central Square, creating visual interest.
- 6.100 The development has been designed in order to support both long range views, alongside active use at ground floor that creates a welcoming and attractive environment, in order to ensure that the proposals support Cardiff's existing townscape. The crown and pinnacle of the tower seeks to highlight the ambition to create importance to the building and provide a focal point within Central Square. The differentiation of the top of the building through the change in banding and the introduction of pinnacle creates a subtle and refined significance to create a significant contribution to Cardiff's skyline. The pinnacle has been designed to showcase the strategic importance of the Site, with the incorporation of lighting design, identifying the aesthetic quality of the building and adding vibrancy, both day and night.
- 6.101 At a local scale, the ground floor has been designed to create a high-quality and elegant design that promotes active use. The arches reflect the contextual design and provide importance to the ground floor use, whilst also providing visual connections through the building. The mix of glass and brick at ground level, both at the tower and pavilion, integrate with Central Square and enhance the streetscape. The location and orientation of the main building responds to the main frontage on Wood Street and creating a positive relationship with the adjacent public realm, highways and pavilion. The pavilion is located within the public realm, creating an interconnected relationship with

the landscaping and aligning with the Betty Campbell statue and creating a welcoming environment for pedestrian use.

- 6.102 The proposed development design also seeks to respond to local identity in accordance with draft Policies SP15 and WL1. The design seeks to incorporate culture and Welsh language, with signage proposed to reference local heritage and language. The building is proposed to align the Council's aim to re-brand Central Square as Eisteddfod Square, which will be referenced internally and externally within the buildings, and within the landscape design, proving cultural benefits in line with the Council's wider aspirations for the area.
- 6.103 Accordingly, the proposed development complies with the objectives of the Local Plan, the Deposit Plan and the Cardiff Design Guide, enhancing the character of the area while delivering a high-density residential development of exemplar design quality.

Relationship with Surrounding Properties

- 6.104 Local Plan Policy KP5(x) outlines that new developments should ensure that there are no undue effects on the amenity of neighbouring occupiers and connect positively to surrounding communities.
- 6.105 The Cardiff Design Guide provides additional guidance on how developments should be designed to ensure adequate privacy, including a separation distance of at least 21 metres between facing windows. In addition, the scale and massing of any design must not be overbearing or result in the unacceptable overshadowing of neighbouring properties.
- 6.106 Draft Policy SP5 within the Deposit Plan sets out the importance of developments ensuring high quality amenity for future occupants, ensure no undue effect on the amenity of neighbouring occupiers and connect positively to surrounding communities.
- 6.107 In addition, BRE Guidance provides a series of techniques for assessing the extent to which any development provides adequate daylight and sunlight to habitable rooms within any development, or affected neighbouring buildings.
- 6.108 The Daylight and Sunlight Assessment, prepared by Development and Light and submitted in support of this application, demonstrates that the proposed development performs very well against the relevant daylight and sunlight guidance, particularly given the constrained urban context.
- 6.109 The assessment confirms that 99% of the 1001 windows assessed in surrounding properties meet the BRE's recommended levels for Vertical Sky Component (VSC), and 100% of the 694 rooms comply with the No Sky Line (NSL) guideline. Additionally, all 265 windows subject to sunlight

assessment meet the Annual Probable Sunlight Hours (APSH) standard at winter, and 97% meet summer annual ASHP standards.

- 6.110 Additionally, a Wind Microclimate Assessment Report has been prepared by GIA and submitted in support of this application. This Report, which includes wind tunnel testing, concludes that there would be no significant adverse wind effects anticipated as a result of the proposed development. Furthermore, wind comfort conditions would be suitable for the intended use, or no worse than the baseline conditions for all general thoroughfares and roadways, bus stops, existing off-site building entrances, proposed and existing benches and the proposed roof terrace and balconies.
- 6.111 As such, when considering impacts to surrounding properties and users of the area in terms of daylight, sunlight and pedestrian comfort, the impacts of the scheme can be considered acceptable on balance and thus would accord with Local Plan Policy KP5(x) and the Cardiff Design Guide.

Pavilion

- 6.112 PPW outlines that new development must consider the *agent of change* principles in order to ensure that development manages any change for which it is responsible. This ensures that developments include solutions to address noise from nearby pre-existing infrastructure, businesses or venues.
- 6.113 Local Plan Policy R8 highlights that proposed food and drink uses must carefully consider amenity impact when adjacent to residential uses, to mitigate nuisance and loss of amenity. Cardiff's Food, Drink and Leisure Uses SPG also outlines the importance of considering amenity, noise and disturbance in order to ensure a pleasant and attractive environment.
- 6.114 The surrounding context predominantly comprises primarily commercial and office use and is typical of a city centre location. As such, the pavilion would be in keeping with, and would support active uses in Central Square, as well as the wider vitality of the City Centre. The proposed residential accommodation within the adjacent tower is provided at 5th floor and above, ensuring that the pavilion would not impact the amenity of future occupiers. The noise levels of the pavilion would be controlled by condition in order to minimise any impacts.
- 6.115 Accordingly, the proposals ensure that the development would have no undue impact on the surrounding development, ensuring adequate levels of amenity for existing occupiers in terms of daylight, sunlight and noise. As such, the proposals would comply with National Policy and Local Plan Policy, in particular Policy KP5 and R8.

Transport and Connectivity

- 6.116 The National Plan and PPW places a strong emphasis on promoting sustainable transport as a core element of development planning. Policy 2 of the National Plan states that placemaking should build

places at a walkable scale, with homes, local facilities and public transport within walking distance of each other.

- 6.117 This is also reflected in the Government's framework document *Building Better Places: The Planning System Delivering Resilient and Brighter Futures*, which sets out active travel as a key requirement to deliver sustainable places.
- 6.118 The National Plan Policy 12 encourages active transport in order to prioritise walking and cycling. In urban areas, the Government supports sustainable growth and regeneration through integrating public transport and local connectivity.
- 6.119 The principles of active travel are supported in TAN 18 Transport, which encourages sustainable development and communities that integrates travel efficient development, and promotes cycling and walking.
- 6.120 At the local level, Local Plan Policy KP5 identifies that good design provides a healthy and convenient environment for all users, encouraging walking and cycling and made accessible through maximising sustainable transport and connected spaces.
- 6.121 Local Plan Policy KP8 seeks to achieve an overarching goal of 50:50 modal split between journeys by car and journeys by walking, cycling, and public transport, reducing dependency on the car and enabling sustainable transport. Moreover, Local Plan Policy KP14 seeks to reduce health inequalities through encouraging healthy lifestyles, including through active travel, which is supported within the emerging Local Plan.
- 6.122 Local Plan Policy T1 encourages walking and cycling in order for people to access employment, essential services and community. This is promoted through high-quality sustainable design, permeable and legible networks, alongside connections to the Cardiff Strategic Cycle Network and routes forming part of the Cardiff Walkable Neighbourhoods Plan. The policy identifies the facilitation of convenient and attractive walking and cycling connections and supporting facilities including, signing, secure cycle parking and, where necessary, shower and changing facilities, alongside further Council supported provisions including Car-Free Zones. This is supported within emerging Policy, including Deposit Plan draft Policy T1.
- 6.123 Policy T5 sets out that where necessary, safe and convenient provision will be sought in conjunction with development for pedestrians, disabled people, cyclists, powered two-wheelers, public transport, vehicular access and traffic management, parking and servicing and horse riders.
- 6.124 Policy T6 outlines that new development will not be permitted which would cause unacceptable harm to the highway, public transport and other movement networks.

-
- 6.125 Policy KP12 sets out the Council's requirements for waste management, whereby part iii highlights the importance of new developments providing and maintaining sustainable waste management storage and collection arrangements. This is supporting with the Deposit Plan, draft Policy SP23.
- 6.126 In addition, draft Policy MPW9 sets out that where appropriate, provision will be sought for facilities for the storage, recycling and other management of waste.
- 6.127 Cardiff Design Guide highlights the importance of walking, cycling and public transport should be attractive, practical and convenient for development in order to provide convenient travel choices for all. In addition, high density development should be focused along public transport corridors.
- 6.128 Moreover, the Managing Transport Impacts SPG encourages active travel in order to enable access and maximise sustainable travel for new developments. As part of this, the SPG provides parking standards for new developments, whereby the Council's starting point will be a car free development.
- 6.129 Deposit Plan draft Policy SP4 identifies the importance of accessibility and permeability in delivering good quality and sustainable design. This includes ensuring developments are distances of key local uses, open spaces, facilities and services, or a public transport service that reasonably links to them. In addition, draft Policy SP13 seeks to reduce health and wellbeing inequalities, including through the provision of accessible and healthy environments and active travel.
- 6.130 Draft Policy T4 sets out the expectation for new developments to demonstrate how the need to travel is reduced and essential travel needs can be met by the use of transport modes other than the private car.
- 6.131 Draft Policy T4 sets out that design should create places that are safe, secure and attractive; allow for the efficient delivery of goods, and for access by service and emergency vehicles; charging; not create unacceptable harm to the safe and efficient operation of pedestrian and cycle routes, public rights of way, bridle routes, public transport and the highway.
- 6.132 Draft Policy SP18 seeks to integrate transport infrastructure and services in order to achieve the target for 75% of all journeys to be made by sustainable transport modes and reduce dependency on cars. The Policy seeks to integrate travel modes and maximise sustainable and active transport, improving safety for all travellers, alongside wider Council goals.
- 6.133 A Transport Statement has been prepared by WSP and is submitted in support of this application. This demonstrates that the proposed development is ideally located for sustainable transport, being just a two-minute walk from Cardiff Central Station and Bus Interchange, providing local and regional connections. As a fully car-free development, the development would significantly reduce its environmental impact and encourages the use of alternative transport modes. The development is

expected to generate predominantly pedestrian, cycle, and public transport trips, with minimal impact on the local road network.

- 6.134 Vehicular trips to and from the Site will comprise exclusively deliveries and servicing trips. The Transport Statement includes a swept path analysis to demonstrate that delivery and servicing vehicles are able to access the rear of the Site. Accordingly, the transport impacts of the proposed development would be limited and acceptable.
- 6.135 The proposals include 528 cycle parking spaces within the proposed residential building, alongside 52 public cycle spaces within the adjacent square. Whilst these spaces are below the cycle parking standards, given the central and highly sustainable location of the Site it is considered that the number of cycle parking spaces is reflective of the likely use and uptake of the spaces. The bike hub at ground floor, which will utilise the 528 bicycle spaces on a flexible basis and be accessible to the public, seeks to promote cycling opportunities at the Site for both residents and the public. In addition, the proposed delivery of 1 cycle space per dwelling is reflective of the Extant Permission, which was considered acceptable by Officers.
- 6.136 A Framework Travel Plan has also been prepared by WSP and is submitted in support of this application. This identifies several initiatives to promote sustainable transport and reduce reliance on private cars, including resident travel packs with public transport and cycling information. The plan also encourages residents to engage in active travel by providing safe, secure, and accessible bike storage and information on local walking and cycling routes.
- 6.137 Overall, the proposed development has been designed to minimise transport impacts and maximise sustainable travel opportunities. The highly sustainable city centre location, which benefits from excellent public transport links and the car-free nature of the development, combined with the provision of secure cycle parking and a Travel Plan that promotes active travel, ensures that residents will have a wide range of sustainable transport options. Furthermore, the publicly accessible bike hub would provide a significant benefit to residents and visitors to the city centre alike. Accordingly, the proposed development should be considered appropriate in Highways terms and would comply with all relevant policies of the Local Plan, the National Plan and supporting guidance and documents.

Energy and Sustainability

- 6.138 Built environment sustainability is incorporated within policy and regulation at a national and local level. The Climate Change Act 2008 and the National Plan set out national frameworks by which to mitigate climate change, promote renewable energy and achieve reductions in carbon dioxide emissions.

-
- 6.139 Specific policies within the Local Plan seek to minimise the impact of new development with respect to carbon dioxide emissions and environmental impacts, whilst also ensuring new development is resilient to the impacts of projected climate change. Objective 3 aims to deliver economic and social needs in a co-ordinated way that respects Cardiff's environment and responds to the challenges of climate change. Policy EN12 requires development proposals to maximise the potential for renewable energy.
- 6.140 Local Plan Policy KP5 seeks to mitigate against the effects of climate change through reducing carbon emissions, protecting and increasing carbon sinks, adapting to the implications of climate change, promoting energy efficiency and renewable energy, avoiding areas susceptible to flood risk and preventing development that increases flood risk.
- 6.141 The Deposit Plan draft Policy RE2 expects all new build development on major and strategic sites to achieve carbon net zero regulated emissions, including through measures to maximise energy efficiency, utilising sustainable heating and cooling systems and incorporating on-site renewable energy generation.
- 6.142 Draft Policy SP4 sets out the requirements for developments to be energy efficient and be designed to be climate responsive, minimise energy demands in construction and use and maximise renewable energy generation.
- 6.143 In line with the requirements of the Local Plan, and in order to demonstrate the proposed scheme's commitments to delivering sustainable design, an Energy and Sustainability Statement has been prepared by WSP and has been submitted as part of this application. This Statement sets out the measures to be employed within the design of the proposed development in order to incorporate energy efficiency. In addition, a Green Infrastructure Statement, prepared by Layer Studio, identifies how the development has maximised opportunities for biodiversity and would be resilient to future climate change, aligning with adopted and emerging local policies.
- 6.144 The proposed development focuses on reducing energy demand through sustainable building design. The proposed development sets ambitious BREEAM targets, including BREEAM New Construction UK Residential for main tower and pavilion with aspirational target of 'Excellent' rating and 'Very Good' as minimum required, alongside Fitwel Multi-family Residential with aspirational target 3 Stars.
- 6.145 The Energy and Sustainability Statement also details the means by which the proposed development may minimise carbon dioxide emissions. The proposals seek to future proof the Site, whereby the design allows connection to a future district heating network. The Energy Strategy includes consideration for Air Source Heat Pumps ('ASHPs') to provide the primary heat generation, alongside the potential for a 5th Generation Ambient Loop. In addition, a feasibility study will be completed for

the inclusion of photovoltaic ('PV') panels. Overall, the design has sought to prioritise energy efficiency, carbon reduction, and climate resilience.

- 6.146 As such, the proposed development demonstrates the Applicant's commitment to meeting high sustainability standards. The combination of energy-efficient design, low-carbon energy solutions, and sustainable building materials ensures compliance with both national and local policy requirements. The proposed Energy Strategy would also contribute to reducing carbon emissions and aligning the development with the goals of the adopted and emerging Local Plan and the National Plan. These measures will not only ensure long-term environmental benefits but also create a high-quality, sustainable living environment for future residents.

Landscaping, Biodiversity, Trees and Ecology

Landscaping, Biodiversity and Ecology

- 6.147 National Development Plan Policy 9 seeks to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure. The PPW published in February 2024 introduced a biodiversity net gain regime - Net Benefit for Biodiversity ('NBB'). Paragraph 6.4.4 states that:

'All reasonable steps must be taken to maintain and enhance biodiversity and promote the resilience of ecosystems and these should be balanced with the wider economic and social needs of business and local communities. Where adverse effects on biodiversity and ecosystem resilience cannot be avoided, minimised or mitigated/restored, and as a last resort compensated for, it will be necessary to refuse planning permission.'

- 6.148 Local Plan Policy KP16 requires new development to demonstrate how green infrastructure has been considered and integrated into the proposals. This is supported within the emerging local plan, whereby draft Policy BG4 outlines that development will only be permitted where it can be that Net Benefits for Biodiversity ('NBB') can be achieved. In addition, draft Policy SP21 expects developments to maintain and enhance the integrity, extent, diversity, quality and connectivity of green infrastructure assets; provide multi-functional green spaces; provide NBB; and ensure the resilience of ecosystems can be maintained.
- 6.149 Local Plan Policy C3 and draft Policy C3 encourage all new development to be designed to promote and secure environment to minimise opportunity of crime, for instance through defined routes, natural surveillance, defined spaces, good standard of lighting and designed with management and maintenance in mind.
- 6.150 Policy C5 outlines that the Council will support the provision of open space, outdoor recreation, children's play and sport in new residential development. This is also reflected in draft Policy OS2.

-
- 6.151 The design rationale for the approach to landscaping within the proposed development is detailed in the Design and Access Statement, prepared by Layer Studio and 5Plus. This proposes a high-quality landscaping and planting strategy which would deliver a new landscaping scheme incorporating a minimum of 22 different types of ornamental shrubs and grasses, raised planters and green edges, rain gardens, open space and tree planting. Green roofs are proposed, ensure greening is maximised across the Site, which currently benefits from no biodiversity value.
- 6.152 The public realm would provide functional and meaningful open space which can be accessible by both residents and visitors of the Site. The proposed development provides a significant planning benefit through these landscaping and planting arrangements.
- 6.153 In accordance with Local Plan Policy C3, the proposed development has been designed with community safety at the forefront. Key legibility and defined routes are provided through the Site, supporting natural surveillance from both the tower and the Pavillion. The Design and Access Statement provides further details of the public space and routes, including lighting design, prepared by Layer Studio and 5Plus.
- 6.154 The Preliminary Ecological Appraisal, prepared by WSP and submitted in support of this application, notes that the Site is of low potential to support any protected and/or notable species. Accordingly, appraisal makes no specific further recommendations in the form of further survey work for the proposed development. Notwithstanding, general mitigation measures, including ensuring that works follow environmental best practice, will be followed to ensure compliance with relevant legislation and planning policy.
- 6.155 The Green Infrastructure Statement, prepared by Layer Studio and submitted in support of this application, identifies how the development would deliver on-site biodiversity benefits. This includes a combination of clear-stem and multi-stem urban tree planting, rain gardens, sustainable drainage systems, a biodiverse green roof on the proposed pavilion and raised planters, including year-round seasonal interest. The proposals would make a meaningful contribution to urban greening within a constrained, high-intensity city centre setting. As such, the proposed development accords with national and local policy in order to deliver Net Biodiversity Benefit to the Site.

Trees

- 6.156 Local Plan Policy EN8 outlines that the Council will not permit development that would cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value. In addition, this policy does not permit the unacceptable harm that contributes significantly to mitigate the effects of climate change. This is reflected within draft Policy BG5, which notes that this must be offset by achieving significant and evident public amenity benefits

-
- 6.157 In addition, draft Policy SP20 identifies objectives in order to secure climate resilience. Part iii of this policy highlights the importance of protecting and increasing carbon sinks through the increase in tree planting.
- 6.158 The Arboricultural Impact Assessment, prepared by WSP and submitted in support of this application, outlines that there are currently no trees within the Site. There are seven, moderate quality trees identified just beyond the Site boundary. Notwithstanding, the proposed development has been designed to avoid impacts to trees and vegetation and, as such, no tree features will need to be removed in order to enable development.
- 6.159 In addition, the proposed development includes a high-quality landscaping strategy, which would seek to deliver 12 new trees. The proposed trees seek to enhance the public amenity and provide significant ecological value.
- 6.160 As such, the development seeks to retain and protect existing trees within the context of the Site, alongside proposing significant tree planting, in order to enhance the natural environment and public amenity. The proposals are therefore compliant with all National and Local Plan Policy.

Flood Risk and Sustainable Drainage Systems ('SuDS')

- 6.161 National Development Plan Policy 8 promotes flood risk management which supports sustainable strategic and regeneration in National and Regional Growth Areas, such as Cardiff.
- 6.162 Wales TAN15, Development, Flooding and Coastal Erosion, seeks to direct new development away from high flood risk areas. Notwithstanding, the document enables development within 'defended zones' (including the Site) subject to justification and acceptability of consequence.
- 6.163 At the local level, Local Plan Policy KP15 seeks to mitigate the effects of climate change, whereby Part V seeks to avoid areas susceptible to flood risk in the first instance, in accordance with the sequential approach.
- 6.164 Local Plan Policy EN10 sets out that development should apply water sensitive design to include the management of water demand and supply, wastewater and pollution, rainfall and runoff, watercourses and water resource, flooding and water pathways. Policy EN11 sets out that development will not be permitted where unacceptable harm to the quality or quantity of underground, surface or coastal waters is proposed. This is supported within emerging Policy.
- 6.165 Moreover, Local Plan Policy EN14 controls developments and flood risk. As part of this, development will not be permitted within tidal or fluvial flood plains unless it can be demonstrated that the site is justified in line with national guidance; where it would increase the risk of flooding; where it would

hinder future maintenance or improvement schemes of flood defences and watercourses; where it would cause adverse effects on the integrity of tidal or fluvial defences; or where ground floor bedrooms are proposed in areas at high risk of flooding.

- 6.166 Policy EN14 also requires development, where appropriate, to include environmentally sympathetic flood risk mitigation measures, including SuDS.
- 6.167 Within the Deposit Plan, draft Policy W1 requires development to apply water sensitive urban design solutions. This includes the management of water demand and supply, waste water and pollution, rainfall and runoff, watercourses and water resource, flooding and water pathways. The draft policy supports nature-based solutions, including ecological enhancements.
- 6.168 The Flood Consequences Assessment, prepared by WSP and submitted in support of this application, identifies that the Site has a degree of both fluvial and tidal flood risk due to the presence of the Afon Taf and Cardiff Bay. However, it is noted that the Site is protected from both of these sources, being situated within a TAN15 Defended Zone. Accordingly, the Site is considered to be at a low overall risk of flooding. In consideration of this, the ground floor comprises residential ancillary space, alongside non-residential uses, and as such, consists of less vulnerable uses.
- 6.169 The Drainage Strategy prepared by WSP and submitted in support of this application, focuses on mitigating surface water runoff through the use of SuDS. The aim of the surface water drainage strategy is to mimic the natural catchment processes as closely as possible. The proposed development will be split into several surface water catchments, each with a separate drainage network. Surface water disposal will be via discharging to a surface water or combined sewer and ensure surface water will be managed on the site for all rainfall events up to and including the 1 in 100 year + 40% climate change. In addition, Sustainable drainage features are to be used across the development to comply with hydraulic control and water quality requirements.
- 6.170 In addition, consideration has been given to the foul drainage solutions, whereby foul water disposal will be via discharging to a foul water or combined sewer located near the Site. Details of this will be confirmed in due course with Cardiff Council and the relevant statutory undertakers, and controlled by condition.
- 6.171 In summary, the Flood Consequences Assessment and Drainage Strategy confirm that the proposed development is in a low flood risk area and has incorporated effective SuDS to manage surface water runoff. The strategy complies with the National Development Plan and the relevant policies within the Local Plan, ensuring that the development will be safe, sustainable, and resilient to the impacts of climate change.

Land Contamination

- 6.172 Local Plan Policy EN13 outlines that the Council will not permit development that would cause or result in the unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of natural conservation, landscape or built heritage because of the presence of unacceptable levels of land contamination. This is supported within emerging Policy PC1.
- 6.173 The Phase 1 Ground Conditions Desk Study, prepared by WSP does not identify any constraints to the development. In consideration of the existing desk study and site investigation available for the Site, Made Ground to overlie Tidal Flat Deposits, River Terrace Deposits (Gravels) and the Mercia Mudstone are identified, which are considered typical of this area of Cardiff.
- 6.174 The Report recommends that a specific site investigation and further targeted studies should be undertaken post determination. These further details would be secured by condition. Accordingly, the scheme can be considered to comply with Local Plan Policy EN13,

Noise, Air Quality and Light

- 6.175 Planning Policy Wales outlines the planning policy framework for addressing air quality, soundscape and noise matters. Figures 4 and 5 highlight the prioritisation of environmental protection and the minimisation of environmental impact as one of the five key principles for ensuring that development occurs in appropriate locations. This principle encompasses the creation of suitable soundscapes, the mitigation of environmental risks, and the reduction of overall pollution.

Air Quality

- 6.176 Local Development Policy KP18 seeks to minimise impacts on the city's natural resources and minimise pollution. Specifically, Part iii outlines the requirement to minimise air pollution and manage air quality.
- 6.177 In addition, Policy EN13 sets out that the Council will not permit development that would cause or result in the unacceptable harm to *inter alia*, health and local amenity, because of air pollution. This is supported within draft Policy PC1.
- 6.178 The Air Quality Assessment prepared by Cass Allen and submitted in support of this application assesses the potential air quality impacts of the proposed development. The report evaluates both the construction and operational phases, taking into account local air quality conditions and the relevant national and local planning policies.
- 6.179 The construction phase was assessed for potential emissions of dust and particulate matter (PM10). Based on worst-case assumptions, the appraisal identifies a Medium Risk of dust soiling and a Low Risk for PM10 health effects. However, with the implementation of best practice mitigation measures,

such as dust suppression, monitoring, and careful site management, the report concludes that no significant residual air quality impacts are expected during construction.

- 6.180 For the operational phase, the report focuses on the potential impact of increased traffic from the development on nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}). The findings indicate that pollutant concentrations across the Site will remain well below the relevant Air Quality Objectives (AQOs), with no significant adverse effects anticipated. Therefore, the site is considered suitable for the proposed use, with no requirement for additional mitigation.
- 6.181 In addition, the proposed development is car free and, as such, is not anticipated that any of the screening criteria set out in the IAQM Guidance under *Land Use Planning & Development Control: Planning for Air Quality* would be exceeded and therefore, no significant impacts are anticipated. As such, the residual effect of the development's operational phase vehicle trip generation on existing sensitive receptors in the vicinity is expected to be not significant.
- 6.182 In summary, the proposed development is suitable in terms of air quality. The risks associated with dust and emissions during construction are manageable with appropriate mitigation, and the operational phase will not result in significant air quality impacts. As such, there are no air quality constraints that would impede planning consent for the development.

Noise Pollution

- 6.183 Tan 11, Noise provides technical advice to minimise the adverse impacts of noise to ensure development does not cause an unacceptable degree of disturbance. The guidance outlines the measures that can be introduced to control the source of, or limit exposure to, noise, including engineering, layout and administrative (such as limiting operating times).
- 6.184 Local Development Plan Policy EN13 sets out that the Council will not permit development that would cause or result in the unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of natural conservation, landscape or built heritage because of noise pollution. This is supported within emerging Policy PC1.
- 6.185 A Noise Impact Assessment has been prepared by WSP and submitted in support of this application. The report is based on a detailed environmental noise survey conducted in February 2025 and July 2025, covering various points on and around the Site. The primary sources of noise identified during long-term measurements included road traffic from various surrounding roads, train noise and plant noise emissions from adjacent rooftop terraces. In addition, during the February 2025 survey, noise was captured from a sports event taking place at the Principality Stadium. To note, the assessment identifies that surveys were taken of music events during July 2025 and WSP are to agree the assessment approach with the Council for these surveys and secure through condition, as per the Extant Permission.

-
- 6.186 The assessment confirms that the proposed façade insulation and MVHRs will help ensure that there will be suitable noise mitigation measures to ensure suitable internal and external noise levels achieved. The details of these measures can be refined during the detailed design and controlled by planning condition.
- 6.187 In terms of the communal terrace, the assessment indicates that some external areas will experience higher noise levels than the recommended threshold for residential outdoor spaces. However, it is assumed that screening provided by the proposed parapet will result in noise levels on the terrace below the target.
- 6.188 For noise generated by the development itself, including potential plant noise, the report sets specific noise limits to ensure minimal impact on nearby noise-sensitive receptors. The assessment indicates that plant noise can be controlled to meet standards, with further details to be refined during the detailed design stages.
- 6.189 Overall, the Noise Impact Assessment demonstrates that the proposed development is compliant with relevant national and local noise policies. With appropriate mitigation, the development will not result in significant adverse impacts from noise and will provide a suitable living environment for future occupants. The proposals are therefore compliant with all National and Local Policy.

Light Pollution

- 6.190 Local Development Plan Policy EN13 sets out that the Council will not permit development that would cause or result in the unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of natural conservation, landscape or built heritage because of light pollution. This is supported within emerging Policy PC1.
- 6.191 The proposals are located in the city centre, largely surrounded by commercial buildings, used through the day. As such, the area would not be considered to be light sensitive with no measurable light pollution.
- 6.192 The proposed development includes a proactive approach to lighting design, including a lighting strategy for the pinnacle of the building, details of which are set out in the supporting Design and Access Statement. Accordingly, the proposals are considered to align with National and Local Policy.

Fire Safety

- 6.193 Wales are currently in the process of developing the proposed Building Safety (Wales) Bill. The Building Safety (Wales) Bill will be introduced in this Senedd term in order to establish a new building safety regime in Wales covering the occupation and ongoing management of multi-occupied residential buildings.

-
- 6.194 In order to ensure health and fire safety is a fundamental priority and integral to the design and operation of the proposed development, a Fire Statement, prepared by Artec, has been prepared and submitted as part of this application. This report highlights that the proposed development would demonstrate that fire safety has been given due consideration at the earliest stages of development.

Draft Section 106 Heads of Terms

- 6.195 PPW, Community Infrastructure Levy ('CIL') Regulations 2010 (as amended) and Welsh Office Circular 13/97 'Planning Obligations' (or subsequent versions) provide the legislative and policy framework governing the use of planning obligations in order to restrict the development or use of land; require land to be used in a specific way; require operations or activities to be carried out; or require payments to be made to the authority. The Council published their draft CIL Charging Schedule in September 2016, but no Charging Regime has been adopted to date.
- 6.196 Local Plan Policies KP6 and KP7 and draft Policies SP5 and SP6 identify the importance of delivering necessary infrastructure, whereby planning obligations will be sought to mitigate any impacts directly related to the development.
- 6.197 As part of the determination of the application, the Applicant is fully committed to engaging with the Council in detailed discussions with regards to any potential S106 obligations that will be required as a result of the proposed development. Any S106 obligations will need to take into consideration the viability and wider benefits of the proposed development, and are anticipated to cover affordable housing, community facilities, education, public open space, public realm, and other infrastructure contributions.

7. SUSTAINABLE DEVELOPMENT AND SCHEME BENEFITS

- 7.1 The National Plan and PPW promotes placemaking in order to deliver sustainable development and draw upon an area's potential to create high quality development and public spaces. This is achieved through the promotion of people's prosperity, health, happiness, and well-being in the widest sense. This includes maximising the social, economic, environmental and cultural benefits.
- 7.2 The following section provides an assessment of the Site and proposed development against this, demonstrating how the scheme will bring a range of economic, social, environmental, and cultural benefits to the local area and the wider city region.

Table 7.1 Scheme Benefits

Sustainable Development and Placemaking	Benefits of the Proposed Development
Economic	Redevelopment of an existing site which provides limited economic benefit to the Borough, to deliver 528 high quality homes which would increase the benefits to the local economy through additional Council Tax receipts up to £1 per annum. Provision of a new high quality flexible non-residential uses to retain an active frontage to Central Square, whilst bringing modern town centre uses into the area, retaining its economic vitality, with £11.2million of resident expenditure per annum. The proposed pavilion and flexible non-residential uses floorspace would provide 32 direct jobs. Creation of £227 million GVA through the construction stages alone, through the creations of jobs and apprenticeships and the economic impact of employment and supply chain spend. Further investment in the local area, supporting direct jobs and induced construction-phase jobs, as well as the local economy through additional spending during construction.

	Promote Active Travel through the provision of a the new bike hub, which provides a key economic advantage, as walking and cycling benefits for local people and the economy. These include increased spending on the high street and town centres, benefits to employers, reduced costs for the NHS from greater physical activity and reduced congestion. The Applicant will comply with the relevant requirements relating to additional planning obligations, bringing opportunities to enhance the local infrastructure in the area for residents, workers and visitors.
Social	The scheme would deliver 528 high quality homes in a range of sizes, helping the Council to meet local and regional housing need and positively planning for future housing growth. Contributions towards affordable housing provision, to meet a defined local need. Additional employment opportunities for local residents within the Construction Phase to boost the local community. A significant quantum of high-quality internal and external amenity space within the development, both communal and private, to provide space for social interaction and recreation which would be beneficial to the wellbeing of future residents. Promoting a walkable scale to the development, integrating the residential uses with the non-residential floorspace. The pavilion and bike hub accommodate usable, active spaces, which are supported by the roof terraces, lounges, coworking, spa and other wellbeing spaces within the development to enable active and healthy lives, catering to varied lifestyles. The Site is centrally in Cardiff and is well-connected to a range walking and cycling networks, including City Centre cycle lanes linking to longer routes like the Taff Trail. The proposals support health and wellbeing through active travel which has clear health benefits as physical activity increases, social connections are made, and mental health is boosted by activity and time outdoors in nature.
Environmental	The new homes provided would be of high-energy efficiency by including measures such as ASHP, 5th Generation Ambient Loop and exploring the

	potential for PV panels. By implementing these measures into the design, the dwellings would be more cost-effective and cheaper to run in the long term and reduce fuel poverty. The proposed development incorporates best-practice design principles with regards to air, light and noise pollution and the recommendations of the accompanying technical reports will be adopted. Drainage improvements through the implementation of a range of innovative Sustainable Urban Drainage ('SuDs') interventions and increased permeability across the Site. The proposed development would also deliver a high standard of sustainability and energy consumption, being energy efficient and highly sustainable in all aspects of the design. The development would meet policy targets in this regard. The proposals would deliver an entirely car free scheme, reducing reliance on cars and ensuring the sustainability of the scheme. The provision of a significant cycle storage, alongside a cycle hub would encourage the use of more sustainable modes of transport by residents within the local area. The proposals would deliver significant biodiversity benefits through the provision of green roofs, xx trees and substantial landscaping across the scheme. The Site is currently vacant, brownfield land with limited biodiversity significance and the proposals seek to improving the public realm and contributing to biodiversity enhancements.
Cultural	An improved quality of the built environment in central Cardiff, through the development of brownfield land to contribute toward the regeneration of Central Square, leading to greater wellbeing and community spirit among residents of Cardiff. Integration of Welsh language and art into the building fabric in order to promote and protect the Welsh language, culture and heritage. The development of a new iconic landmark building for Cardiff and Wales, creating architectural and distinctive significance in the townscape. The

	proposed development would contribute to local identity and provide a recognisable landmark, enhancing civic pride. A high-quality landscaping and planting strategy reinforce the importance of the public realm. The introduction of a pavilion and bike hub enhance the role of Central Square and promote a mixed-use, walkable environment, in turn supporting diverse communities and encouraging inclusive cultural engagement. The provision of the high quality pavilion building, with scope for a new restaurant, to contribute to the redevelopment of the City Centre's commercial offering and encouraging opportunities for everyday cultural experiences.
--	--

8. PLANNING BALANCE AND CONCLUSION

8.1 This planning application has been prepared by Iceni Projects Limited (“Iceni”) on behalf of REAP 3 Limited (“the Applicant”) in support of an application for full planning permission for the redevelopment of the site at Plots 4 and 5, Central Square, City Centre, Cardiff (“the Site”).

8.2 This application seeks full planning permission for the following description of development, hereafter ‘The proposed development’:

“Mixed-use development to provide residential accommodation, flexible non-residential uses, cycle parking, landscaping and other associated works”

8.3 The Site sits at the heart of the wider ‘Central Square’ regeneration area in Cardiff City Centre. Central Square is a strategically important area which the Council consider to be a gateway to the City, and an opportunity to showcase the best that Cardiff has to offer. Given the strategic importance of the location, the Council envisage that the regeneration of Central Square, towards which this development will contribute significantly, will play a key role in attracting investment on other strategically important development sites in the City.

8.4 The proposed development provides the opportunity to make a significant positive contribution to the ongoing regeneration of this part of the Cardiff. The proposed development will build upon the success of the wider Central Square area, proposing a development of exceptional architectural and residential quality. The Applicant is fully committed to the delivery of the Site, and it is their ambition to create a new iconic landmark for Cardiff and Wales.

8.5 This Statement demonstrates that the scheme detailed in this planning application offers a wide range of significant planning benefits, including:

- The delivery of a development which is fully aligned with Wales’ placemaking objectives to deliver sustainable development through, economic, social, environmental and cultural benefits.
- The optimisation of an underutilised brownfield site to deliver 528 much needed new Build-to-Rent homes in a highly sustainable city centre location, within an area undergoing significant regeneration. This significant housing contribution will help the Council to meet local and regional housing need, positively planning for future housing growth and thus directly addressing the Council’s ambitious housing targets of delivering 41,415 new dwellings between 2006-2026.
- The delivery of an iconic new landmark building for Cardiff and Wales. The delivery of the proposed development will play a significant positive role in the ongoing Central Square

regeneration process, acting as a catalyst for future investment within the City Centre, and reinforcing Cardiff's status as an internationally important City.

- The delivery of a new building of the highest standard of design and residential quality. The Applicant's 'amenity-led' approach will deliver an exemplary internal and external amenity offering to residents, creating a sense of community and fostering social interaction. The proposed development will result in 5.4sqm of amenity space per home, significantly above that proposed in the extant permission on the Site (2.5sqm per home), and setting a new standard for the BTR industry.
- The provision of 601sqm of flexible commercial floorspace, including the delivery of a new high-quality pavilion building that can accommodate a restaurant, facilitate active frontages, and provide vibrant city centre uses within this strategically important location.
- A car free scheme with extensive cycle parking facilities, including a publicly accessible bike hub and public cycle parking provision within Central Square, to meet a long-term aspiration of the Council, encouraging sustainable transport for all futures residents as well as people who live and work in the City Centre. The bike hub will also include a workshop facility and cafe offering, which will be accessible to residents and members of the public and play a key role in activating Central Square.
- As part of pre-application engagement with the Council, the Applicant have confirmed their commitment to working with the Council to re-brand Central Square as 'Eisteddfod Square'. As part of this process, the detailed architectural and landscape design will utilise all opportunities to incorporate cultural references to Eisteddfod, creating a new public space of national cultural significance.
- The landscape design will significantly increase biodiversity and urban greening on the Site through a carefully considered landscaping and planting strategy. The landscape design will also incorporate a wide range of sustainable drainage interventions that will help control drainage from the Site.
- New buildings which have sustainability at their core, with a wide range of sustainable design and construction measures incorporated within the proposed design and an all-electric energy performance designed to meet modern standards.
- The provision of financial contributions, including a financial contribution towards affordable housing and other infrastructure within Cardiff.

8.6 When considering the planning balance, the benefits of the scheme are significant, and the sustainable nature of the development weighs heavily in favour of granting planning permission. This Planning and Affordable Housing Statement offers a comprehensive assessment of the proposed development against the Development Plan policies and establishes that the proposed development

accords with all National and Local Planning Policy. Accordingly, planning permission should be granted for these proposals without delay.