Statws/Status: **Confidential**

**Addroddiad Adolygu Dylunio:** 6th August 2008
Design Review report

**Dyddiad Cyfarfod a Disgrifiad o’r Cynllun:** 29/07/08
Meeting Date and Scheme Description: Draft SPG - Tall Buildings

**Awdurdod Cynllunio:** Cardiff Council
Planning Authority:

**Y Panel Adolygu Dylunio:**
Design Review Panel:
Carole-Anne Davies, Cadeirydd/Chair
Cindy Harris, Swyddog/Officer
Charlie Deng, Swyddog/Officer
John Punter, Ewan Jones,
Steve Smith, Roger Ayton,
Charlie Deng

**Cyflwyniad/Presentation**

Representatives of Cardiff Council presented their draft planning policy document for early comment. The draft Supplementary Planning Guidance (SPG) for residential and commercial tall buildings is intended to set out the Council’s expectations for the procurement and delivery of tall building proposals. The council wishes to embed the principles of sustainable development and to aim to achieve the highest standards of design in terms of impact on the skyline, interface at street level, materials and articulation.

The draft policy is one of a fresh suite of guidance documents being produced by the LPA and is timely in that the authority currently have 11 or 12 proposals which are either live applications, or in pre-application discussion. The draft policy identifies buildings of 8 or more storeys in the city centre context to be “tall buildings”. A visual analysis was presented showing existing and approved tall buildings and their locations in the cityscape. The apparent absence of views of the city from high vantage points was highlighted, with the exception of the Cardiff Bay area.
The presenting team sought the opinion of the Panel on the extent to which a geographical approach should be used, including indicative areas, or whether the guidance should be limited to a criteria based approach.

**Ymateb y Panel/Panel’s Response**

The Panel highlighted the following areas:

Clarity was needed on what constituted a tall building. It was agreed that different criteria applied depending on context – suburban or city centre. Different guidance is needed for 4+ storeys in the suburbs and 12+ storeys in the city or Bay.

For the immediate purposes of this draft policy, attention should focus on guidance for city centre and Bay development; guidelines for suburban development should be clearly established as policy within the LDP. The Panel advised that clear reference and links be made to other relevant policy documents such as PPW, TAN 12, TAN 18 and the Manual for Streets, and that inclusive design principles be made explicit.

Cardiff as a capital city authority should be pro-active in defining and positively justifying the sort and standards of development they wish to see brought forward. The growth and development of the city should be driven by public policy, rather than by response to the market. As such, a holistic geographical analysis is required as an integral part of the guidance, and the inclusion of indicative areas where tall buildings: i) would be welcomed, ii) may be acceptable, or iii) would not be considered, would strengthen the guidance as a tool for the development community.

While commending the quality of the draft document, the Panel found the vocabulary too tentative. To achieve real impact, it is essential that language should be absolutely clear and specific requirements should be articulated as necessary conditions. Use of terms such as ‘iconic’ and ‘gateway’ are unhelpful and should be avoided.

Explicit definitions of terms such as ‘easy walking distance’, or ‘public transport hub’ are needed to avoid confusion - e.g ‘easy walking distance’ could mean 400 metres or 600 metres. The Panel emphasised the need to give equal importance to the quality of the pedestrian experience in terms of route safety, attractiveness and convenience, as well as to distances. The criterion of ‘easy access to walking or cycling routes’ also needed to be more clearly expressed to avoid ambiguity. It was confirmed that multi-modal public transport would be a requirement in less accessible locations.

The Panel stated that it was essential for each tall building to have a clear and coherent architectural concept, integrated with an environmental and engineering strategy, and demonstrated through comprehensive design statements. The experience and quality of design teams is crucial to the success of any scheme. Although difficult to control,
clear emphasis in the policy and pre-application discussions, would help signal the importance of good quality design, and unwillingness to accept poor design.

The Panel offered to comment on early proposals and assist with reviews with the Local Authority, and suggested that the guidance should ‘recommend’ early consultation with DCFW to help strengthen the message regarding design quality.

The cumulative effects of developing clusters of tall buildings, not only on the skyline but also on public amenity and open space should be carefully considered. Noise levels and acoustic mitigation; surface wind speed and shading studies; TV reception; construction issues especially on constrained sites; rainwater runoff into public spaces all require careful attention.

The presenting team stated that they would not always require an environmental impact assessment, if they were in receipt of all relevant information. The Panel advised them to require evidence of wind testing and shading diagrams, and an explanation of how this had influenced the design. Key views from specified vantage points, including recent approvals, should be submitted as early as possible, and ‘sensitive’ as well as ‘historic’ contexts respected.

The Panel welcomed the inclusion of sustainability considerations at the heart of the policy, and again emphasised the need for precise language to clarify minimum requirements for low or zero carbon performance.

DCFW endorses the CABE/English Heritage guidance, that tall building development carries an increased obligation to return positive benefits to the immediate and wider environment. Without wishing to be too specific, we noted that a single heating system serving an entire block would be a much more efficient delivery system than the individual electric heating solutions, so widely used at present. With regard to on-site renewables, the Panel stated that there should not be an expectation that roof-top wind turbines were the solution, and that solar water heating may be a more cost effective and efficient means of delivering carbon reductions.

While encouraging mixed use where appropriate, this policy needs to be equally applicable to residential and commercial uses. In terms of futureproofing, we were not convinced that tall residential buildings are sufficiently flexible for non residential use, and it is all the more important to achieve the right mix of uses from the outset.

To maintain street activity and a lively public realm, requires active uses at ground floor level. All parking should be underground and this should be a standard condition, given that even wrap-around active facades for ground floor parking would fail to deliver a satisfactory solution through 360 degrees. We strongly supported the determination to drive down parking provision in the city centre, and the proposed detachment of tall buildings from current parking standards.
Developments of more than 50 units are usually required by the LPA to provide an affordable component of 30%. The authority would require proof if it was claimed that this could not be delivered, and may accept an offsite contribution in lieu, which could provide opportunities for family housing in more suitable locations.

Public open space provision should include consideration and resolution of any microclimatic issues, an absolutely critical factor in creating attractive and usable spaces. The amenity value of communal space, private outdoor space (balconies) and recreational space within the building should also be considered. The Panel noted that the Council intends to issue further guidance on high density residential development, where such matters can be covered in more detail.

Crynodeb/Summary

The Panel welcomed early consultation on this important draft policy and the opportunity for constructive dialogue, and thought that the draft document and supporting analysis formed the basis for strong, effective policy. However, in our view the following issues should be resolved:

- The policy should refer to buildings of more than 12 storeys in the city centre and the Bay, and should cover residential and commercial uses.
- Proposals should aim for a mix of uses, unit sizes and tenures
- The policy should be based on a geographical approach, using cityscape analysis and identifying indicative areas
- Language and terminology should be clarified to avoid confusion and misinterpretation.
- Reference should be made to other relevant planning policy and guidance documents
- Early consultation with DCFW should be recommended to applicants, with a view to establishing the credentials of the design team and the quality and acceptability of the design concept, at the earliest opportunity.
- Amenity and microclimatic issues merit early consideration and a demonstration of their influence on the design
- Requirements for sustainable development should be specific and include early consideration of the proposed M&E strategy.
- The impact of tall buildings at street level should be the crucial consideration and should enhance the quality of the pedestrian experience. Active frontages are essential and minimum parking located underground will facilitate this.
- We anticipate that regular policy review and updates of this policy would be required and we would welcome further consultation

Dwedd/End
A Welsh language copy of this report is available upon request.