



DESIGN
COMMISSION
FOR WALES
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CYMRU

11th August 2020

Dear Colleagues

Re: [19/03053/MNR](#) | PART CHANGE OF USE FROM OFFICES (CLASS B1) TO MIXED OFFICE (CLASS B1) AND PLACE OF WORSHIP (CLASS D1 - NON-RESIDENTIAL INSTITUTION) WITH ALTERATIONS INCLUDING A THREE STOREY REAR EXTENSION, ROOF ALTERATIONS, THE ADDITION OF FRONT AND REAR DORMER WINDOWS, ASSOCIATED ANCILLARY CAFE, SHOP, TEMPORARY LIVING ACCOMMODATION, AND EXHIBITION SPACE WITH APPROPRIATE DEMOLITION WORK | EMLYN HOUSE, 4 DOCK CHAMBERS, BUTE STREET, BUTETOWN, CARDIFF, CF10 5AG

The above noted application has not benefitted from early consultation with the Design Commission for Wales as per recommended best practice in Planning Policy Wales. The Commission has been contacted by concerned third parties owning/occupying neighbouring properties. We understand some third parties have registered objections to the application.

The Commission has considered the materials available, and notes the very late stage in the process, however we have the following independent material comment:

1. We understand from the third parties that consultation notice, and engagement was not wholly effective due to the impact of Covid-19 and that communications did not reach several members of the neighbouring Bay Art property in good time. Pandemic restrictions meant that their public facing gallery and multi-occupancy studios would not have been populated at the time. In the interests of full engagement, the applicant and the Council may benefit from taking further steps to address this.

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2. Whilst the land use is acceptable the proposals generate considerable floor area representing a significant extension, almost to the site boundaries, arguably an overdevelopment of the site.
3. Large areas of full height south facing glazing may benefit from further consideration as part of an explicit and holistic sustainability strategy; the implications for revenue costs of heating, cooling and comfort as well as maintenance.
4. Orientation, fenestration and sunlight/daylight considerations could be more clearly demonstrated in a fuller explanation of the response to the site and context as a whole, rather than a technical statement of design intent and no demonstrable harm to adjoining occupiers. A proposal of this nature ought to more clearly communicate its contribution to neighbourhood enhancement and place-making, going beyond a minimal 'no harm' approach. The proposals could also go further in communicating the sustainability strategy in terms of embodied energy, materials and contributions to de-carbonisation.
5. The neighbouring Bay Art gallery and professional artist's studio complex is long established and was brought about with the aid of Lottery Funds and by the building being partly gifted by Cardiff City Council at the time of its refurbishment, for this specific use. The facility is purpose built to facilitate public and educational activity as well as consistently well-lit studio spaces. The current proposals, based on the materials available, do not appear to have taken full account of impact on the Bay Art property and its functions.
6. Care will need to be taken in terms of construction given the proximity to boundaries which may be prove overly complex and unnecessarily disruptive to neighbouring properties. There is currently insufficient detail design work to communication convincing elevational treatment and detailing.
7. External spaces at the upper levels and their potential future use requires very careful thought as this will need careful management to ensure they are genuinely useable and that they avoid disturbance to neighbouring buildings and the wider neighbourhood.
8. The immediate impact of frontages onto to the lane at the rear require especially carefully attention to avoid blank walls/areas where surveillance is inhibited. A critical balance will need to be achieved for security and for

ensuring a positive contribution to a more pleasant environment, establishing a sense of safety for all pedestrian users.

The Design Commission would have welcomed the opportunity to afford the client and their team full and open dialogue, benefiting from the materials being fully explored in sufficient time for the decision making process to have ensured engagement, collaboration and involvement of all parties, more fully responding to the duty placed upon the Local Authority under the Well-being of Future Generations Act Wales and good practice in terms of design quality, place-making and planning policy in Wales.

It is unfortunate that the opportunity has been missed and that our comment must be placed on the public record so late and without the benefit of the client and design team being able to fully communicate their proposals. As always we remain open to that dialogue should an opportunity present itself, even at this stage.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Carole-Anne Davies', with a long horizontal flourish extending to the right.

Carole-Anne Davies

Chief Executive

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For and on behalf of the Board of Directors