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By email & post

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Fao Justin Jones.

26 January 2018

Dear Sirs,

Town & Country Planning Act 1990

Application Ref: 17/03034/MJR

Taff Housing Association – De Clare Drive, Radyr, Cardiff

I refer to the above planning application currently before you which proposes development of 36 affordable residential units on an area of 0.75 acres at De Clare Drive, Radyr, Cardiff.

I act on behalf of the Sidings Residents' Association and am instructed to submit objections to the proposed development on their behalf. There is considerable concern amongst the existing residents with regards to the impact of the proposed development on the locality and also on the social infrastructure provision in the wider area.

The Radyr Sidings Site has a lengthy and complicated planning history. The former railway sidings site was allocated for residential development in the *City of Cardiff Local Plan* which was **adopted in January 1996**. At that stage **Policy 21 of the Plan** allocated some 6.7 hectares of brownfield land for an estimated 160 units.

An outline planning application for an estimated 350 units was refused by Cardiff County Council in December 1998. That refusal was pursued to appeal and was granted in July 1999.

Since then, several detailed applications have been approved which has resulted in a residential development of over 420 dwellings on the site. This is well in excess of the original density envisaged for the site which is now considered to be at capacity. A development of a further 36 units must be regarded as resulting in an overdevelopment of the site. The existing development of 420 dwellings is already a high density development with few facilities in the immediate locality. A further 36 units would mean that the site is overdeveloped by around 30%. This increase will place additional pressure on the local infrastructure and amenities.

There are major concerns over the density of the proposed development particularly in

comparison to the overall density of the Sidings site. The average density of housing on the Sidings site is 29 dwellings per hectare (see page 20 of the *Council's Residential Design Guide*). The proposed development of 36 units on only 0.3 hectares would mean a density of 120 dwellings per hectare. This is a massively more cramped than the average density throughout the estate. The attached plan gives an indication of the densities on surrounding developments which are considerably lower than the current proposal (See Appendix 1)

The developer claims that the site is previously developed land having been used as a builder's compound. This would have been a temporary use and should not be classed as previously developed land. Within the approved Development Framework for the overall site the land was earmarked for a residential care home. Whilst no care home operator has come forward no evidence has been advanced to prove that any rigorous marketing campaign has taken place or to prove that no demand for such a use exists. In addition, the original Framework for the site included an allocated community site at the northern end of the development for a library or surgery. Such a development never materialised and that land (now known as Brunel Court) has been developed for 9 dwellings on a site of 0.5 acres – far less in density terms as to what is currently proposed.

Development on the current application site will mean that both allocated sites for uses to support the local residential community will have been lost to further residential use. On balance therefore, the Sidings site is considered already to be overdeveloped and the proposed additional 36 units will further exacerbate that position.

The density of the development across the site is also an issue of concern to my clients. The current two & three storey developments over the existing site provides for a dense development façade around the road network and open space.

The proposed development on this site is overly dense and provides for the development of further two and three storey buildings within very close proximity to the site boundaries. This will only reinforce the claustrophobic impact of the development on the locality. The proposed development has two storey dwellings along the southern boundary of the site whilst the remaining 3 sides of the site are characterised by 3 storey blocks close to the boundaries. There is therefore the potential for both overlooking and overshadowing to the existing properties both on De Clare Drive and Arudur Hen. Most of the surrounding properties appear as 2 storey dwellings with the third storey being within the roof (Appendix 4C). The proposal has full 3 storey blocks of flats which will be visually dominant in the locality. *The Council's Supplementary Planning Guidance (Residential Design Guide)* requires the scale and massing of proposals not to be overbearing or to result in the overshadowing of neighbouring properties. Had the site been developed for a care home then such a building would have likely to have been a two storey development which would have had a much lesser impact on neighbouring properties.

The ridge height of the 3 storey blocks exceeds that of the surrounding properties and this in combination with the substantial depth of the blocks in comparison to the existing properties will be overbearing.

The distances between existing and proposed properties are also of concern. The accepted

standard minimum distances between residential properties (habitable rooms) is 21 metres. When scaled from the submitted plans it appears that this standard cannot be met. On the south eastern side of the development the distances is only approximately 12 metres and on the south western side it is around 14 metres.

The *SPG Residential Design Guide* at Page 54 details the issues of sunlight & daylight assessment. It details a 25 degree rule which needs to be considered when new developments are proposed. This requirement has not been addressed or proven. The loss of sunlight and daylight to existing properties is an issue of concern to the residents and proof that sunlight and daylight to existing residents should be provided by the applicants to ensure the requirements of the SPG can be achieved.

Traffic and parking issues are of a further serious concern to the residents. There are existing traffic problems within the Sidings estate itself and also in the wider area.

The estate is already busy in terms of traffic with residents heavily reliant on private cars. This is due to there being no easy access to bus services as claimed by the applicants. The nearest bus stop is 1.1km away – well above the recommended distances. The site is in a void when it comes to bus services (See Appendix 2).

Similarly the train station is some 850 metres away, and there are already problems with existing train services which are unreliable especially during commuting hours.

The Sidings estate is served by a single access road over the bridge which links to King's Road. This access becomes heavily congested at peak times which is further affected by vehicular traffic utilising the Park & Ride at the Station and also the resultant overspill parking on the bridge itself. The traffic generated by the residents of the additional 36 dwellings will only add to the existing problems.

The proposed development site would be served solely from De Clare Drive via the existing estate roads. The traffic through De Clare Drive and other existing estate roads is a constant source of concern to the existing residents. Parking is a major concern to the existing residents and a site visit is considered essential to establish the position in this respect (see Attached Photographs). Traffic flows are severely hampered by parked vehicles and there are real concerns with regards to the access for emergency vehicles in particular but also for large delivery vehicles and waste collection vehicles.

There are also concerns with regards to the traffic implications on the wider road network. The existing roundabout at the station serves the estate itself, the station, Junction Terrace, Fisher Hill Way, Nicholas Court, Clos Maedref and Wilde Court. All the vehicles from these sites have to exit the area via King's Road and then onto Heol Isaf. The junction at King's Road / Heol Isaf is at full capacity. Long queues develop at peak times at this junction. For drivers to be able to get anywhere else in Cardiff or beyond – to the M4 motorway or A470 – vehicles have to access Heol Isaf which can only be done via King's Road. This junction is not managed by traffic lights and for vehicles wishing to travel north (& thereby travel right) waiting times are significant (Appendix 4A). The Transport Statement quotes road safety data up until the end of 2015 which indicates no accidents. However, data for 2016 is in fact publicly available,

and there is a record of an incident on the northern corner of the development site. Further, as highlighted above, road safety needs to be considered in a wider context, and there are records of accidents at the King's Road / Heol Isaf junction, one of which was classed as serious. In addition, the Transport Statement only compares the likely traffic flow from the proposed development of 36 units with that which should be generated from the potential care home.

There does not seem to be any actual assessment of the likely total traffic flows in the context of an already overdeveloped site, and whether this is safe or sustainable.

In addition, there are safety concerns at the junction between King's Road and King's Avenue. This is essentially a blind bend, on a steep slope, with cars usually parked along King's Road. This can cause blockages and add to the congestion during rush hour, and is a significant safety concern given that many children walk along this road to and from Radyr Comprehensive School.

The traffic problems are particularly acute during morning commuter hours and the position will only worsen as and when the Plasdwr development comes on stream. There are therefore significant issues with regards to traffic and circulation throughout the village (See Appendix 4A).

Parking is another major concern of the residents. In this respect there are two main issues –

- The way existing and potential parking habits interfere with the free flow of traffic around the estate and
- The level of parking provision included as part of the proposed development.

With regards to parking provision the proposed scheme allows for 34 spaces for 36 units. Whilst this is above the requirement of the Council's Parking Standards and it is accepted that the parking requirement for social housing schemes are generally lower than those for general residential development, the location of this site in Radyr does not lend itself to be a lower car ownership location as it is some distance from the public transport nodes and other facilities. Arguments on a lower requirement for parking spaces at this location are considered questionable. With the built development being tight to the site boundary, all parking provision is within the central hard surfaced parking court. It is inevitable that residents of the proposed properties will park along the road frontages. This habit already causes difficulties throughout the estate and is an issue recognised by South Wales Police (see attached letter at Appendix 3).

The attached photographs show some of the parking problems that already occur on the estate. This impedes the circulation of traffic and also hinders the movement of the larger delivery vehicles and emergency vehicles. With the internal courtyard arrangement proposed, on street parking will only worsen (Appendix 4A). A less dense development with an appropriate level of parking provision in suitably sited positions should be sought.

Another major concern of the residents relates to the increased pressure which will be placed on the social infrastructure in the locality – most notably the capacity of the schools and also

the provision of medical facilities. Both are currently overstretched and their ability to cater for additional children / patients is considered doubtful.

With regards to schools, the Sidings estate lies within the catchment area of Radyr Primary school, although Bryn Deri school also accepts pupils from the estate. However, Bryn Deri school is some distance away and cannot be considered to be within walking distance from the proposed development. Danescourt Primary school could also accept pupils from the development, but this also cannot be feasibly reached on foot

Radyr Primary school is at full capacity. Whilst Radyr Primary has recently received consent for a further demountable classroom space within the confines of the site it is now at capacity. Whilst it is acknowledged that the larger Plasdwr development will, in due course, provide an additional four primary schools and a secondary school, these schools will not be delivered in either the short or medium term. It is currently estimated that the first primary school will not be delivered for at least four years. With residential properties already being built and sold, and being occupied by families this will only serve to put additional pressure on the demand for school places in the Radyr and Morganstown area.

With regards to Radyr Primary school, the capacity will increase from 45 to 60 spaces next year. However, this is the absolute capacity and no further increase can be accommodated on the site. It should also be noted that 37 applications for a space at the school were refused in this academic year. This indicates that even with the increase in capacity to 60, the school is oversubscribed. The school is approximately 1 mile from the proposed development which equates to a 22 minute walk for an adult.

Bryn Deri school is even further away – about 1.4 miles and a 30 minute uphill walk. It is also oversubscribed, and in the current academic year, the last allocated space was for a child living 0.71 miles away.

Danescourt school is around 0.8 miles from the development and would be reached via the river pathway. It would take around 20 minutes to walk to school. The route to the school is however unsuitable as it is narrow, unlit, uneven and often muddy. Neither is it suitable or encouraging to parents, particularly with toddlers or with a pram (Appendix 4B). It is largely overgrown along its borders and there are no robust barriers to the river. By car the school is 2.2 miles from the proposed development and would need parents to travel along Heol Isaf and the A4119. This would be in stop start traffic and would take around 20 minutes which is clearly not a sustainable solution. Further, Danescourt has also had to refuse spaces for 24 children this year and there is no further capacity here.

There are therefore major problems with regards to school capacity and inevitably access to any school would be by car. The Council's own estimates for school space demand shows an increase over the coming 3 years, and that is without this new development, which could comfortably house up to 26 children. Apart from the Plasdwr development, there are no other proposals to increase school capacity in the area.

Residents also have concerns with regards to the provision of medical services which the local GP surgeries can absorb. The number of patients at the Radyr medical care centre grew from

6818 in September 2006 to 8665 in 2016. By 2016 the patient / doctor ratio was 1773 – this is well above the national average of 1558. Whilst the Radyr Medical Centre is the only practice to cover the Sidings estate, some residents already have registered in surgeries at Llandaff North and Pentyrch. Once again whilst the Plasdwr strategic development will in due course provide additional medical facilities, the delivery of these facilities is to be many years away. Consequently, with properties being already sold on the Plasdwr site existing facilities will only be placed under greater pressure.

These therefore are matters for consideration within the current Taff Housing Association application and are considered to be so significant that any Section 106 Agreement contribution on offer from the developers of the proposed development cannot adequately resolve the major shortcomings identified above in terms of school spaces and medical services.

It should also be noted that the existing roads within the Sidings development have yet to be adopted despite the bulk of the development being completed and occupied for several years. There have been long and protracted discussions between the Council and Taylor Wimpey in an effort to bring the estate roads up to adoptable standards. Any additional traffic on the roads will have implications with regards to their condition and repair. There are particular concerns with the impact of the heavy vehicles during the construction period.

In conclusion therefore, the Sidings Residents' Association strongly oppose the development proposed by Taff Housing Association for 36 Affordable residential units at De Clare Drive.

Broadly, their objections can be summarised as follows:

- The overall Sidings site has been developed to a level well above that which was originally proposed (420 units as opposed to 350 units).
- The development of 36 units on a site of only 0.75 acres is overdevelopment and this density is out of character with the existing estate.
- The scale and massing of the proposal is overbearing and will overshadow existing properties. It results in a claustrophobic environment and standard privacy distances cannot be met.
- The location of the development will lead to a reliance on the use of private cars. Public transport routes, pedestrian routes or cycling will not be attractive to the residents of the development.
- There is only one vehicular access to the Sidings development. Congestion is already a problem further exacerbated by parking problems. Traffic is therefore an issue.
- The development will place further strain on the social infrastructure in the area. All schools are at capacity and the doctors surgery is also under pressure. The position will be further affected by the Plasdwr development which is already under construction.

Accordingly in light of the problems outlined above it is considered that the proposal should be rejected and planning permission should be refused.

Yours Faithfully

A handwritten signature in blue ink that reads "Carolyn Jones". The signature is written in a cursive style with a large initial 'C'.

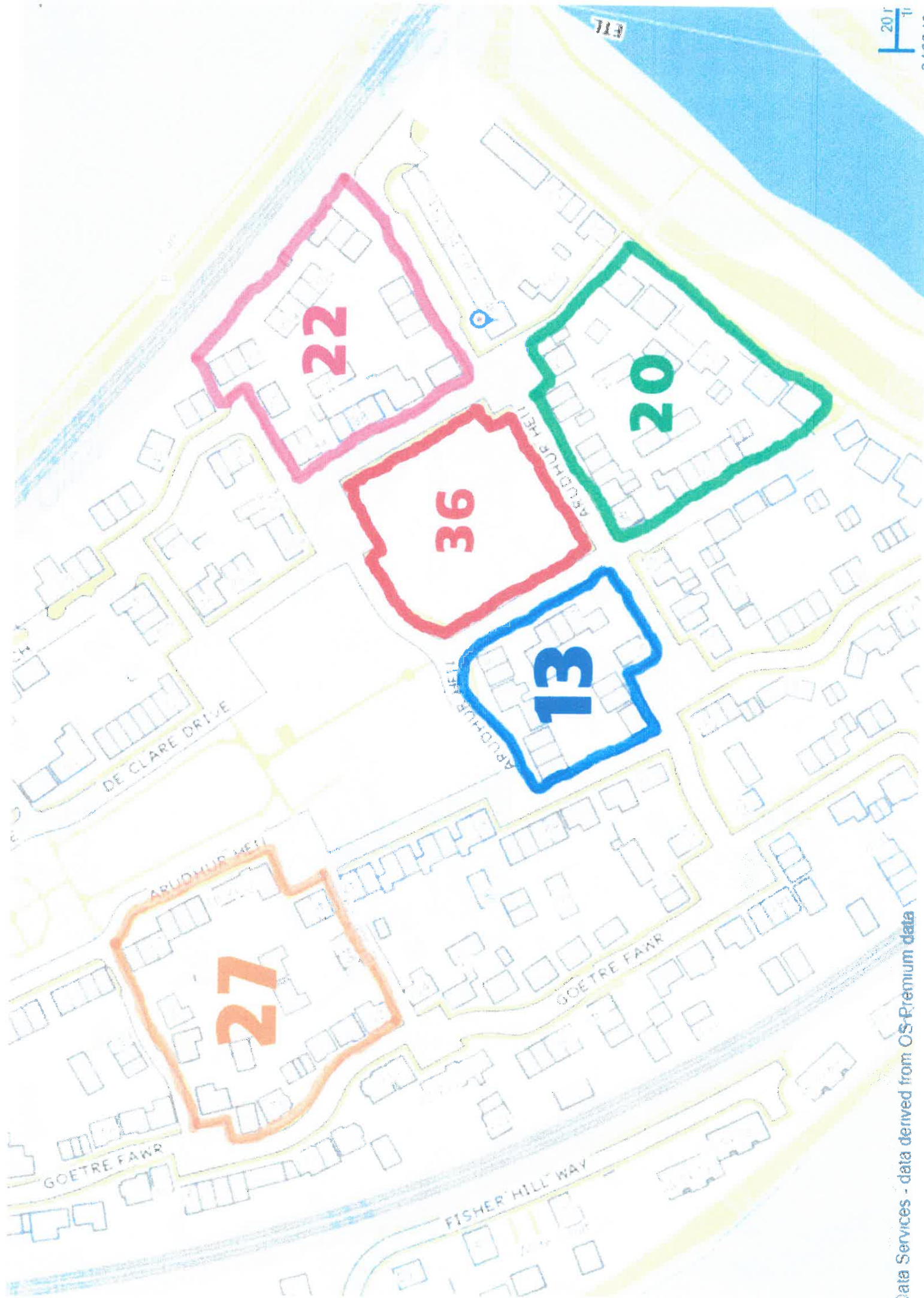
CAROLYN A JONES

Enclosures

***Cc Sidings Residents Association
Radyr & Morganstown Community Council***

APPENDIX 1.0

Comparison of Densities



APPENDIX 2

Location of Bus Stops & Train Stations



APPENDIX 3

Letter from South Wales Police

Appendix



Dear Resident,

The local Neighbourhood Policing Team have recently received concerns regarding parking issues at Radyr Sidings in particular on Goetre Fawr.

The concerns raised are in relation to vehicles parking on the pavement causing an obstruction to pedestrians and also preventing access for emergency vehicles on narrow sections of the road.

We request and remind residents to be mindful when parking vehicles at this location as it may be considered to be causing an obstruction for other residents. We would ask residents to park suitably allowing access on pavements for wheelchair and buggy access and also be mindful regarding emergency vehicle access. Any obstruction caused by parking will be dealt with by the Radyr Neighbourhood Policing Team which may include issuing Fixed Penalty Notices for any parking related offences.

South Wales Police is committed to keeping South Wales a safe place to live and work. We actively work with our partner agencies to ensure that residents have the right to a peaceful life and deal with matters affecting quality of life.

We thank you in anticipation for your co-operation.

Fairwater Neighbourhood Team

Fairwater Police Station

HEDDLU DE CYMRU URhS Y DWYRAIN
Gorsaf Heddlu Bae Caerdydd, Stryd James, Bae Caerdydd CF10 5EW
5EW

Teliffôn: 01656 869211 Ffacsimili: 029 2052 7280

SOUTH WALES POLICE EASTERN BCU
Cardiff Bay Police Station, James Street, Cardiff Bay CF10

Telephone: 01656 869211 Facsimile: 029 2052 7280

APPENDIX 4

Photographs

4A PHOTOS OF PARKING ISSUES

Radyr Park & Ride at capacity on a typical day.



Cars parked on King's Road via the railway station towards Heol Isaf on a typical work day

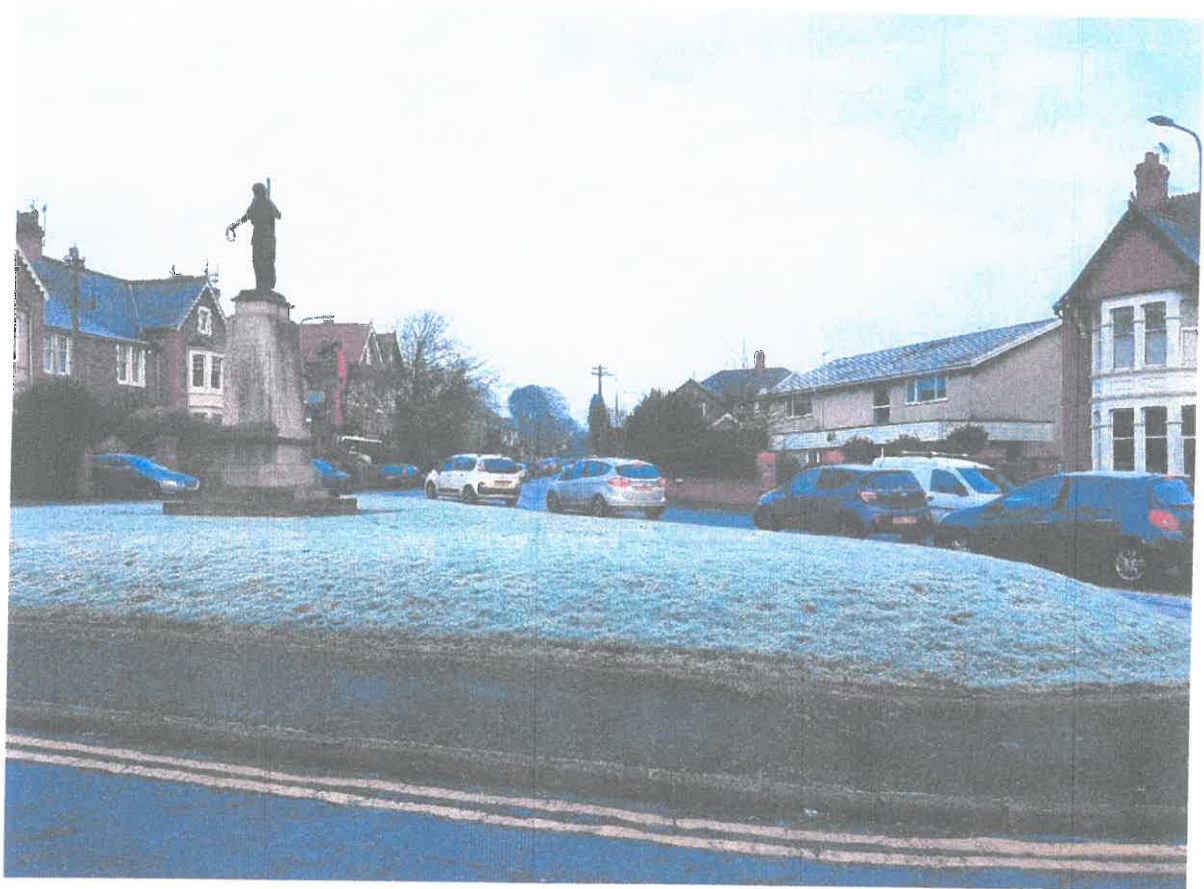




Congestion on King's Road



Traffic queuing at King's Road / Heol Isaf Junction



Existing parking problems within the Sidings estate

4B PHOTOS SHOWING ISSUES WITH USING THE LOCAL FOOTPATH

Figure 1: Flooding of entire path where it passes under railway bridge.



Figure 2: Continuation of path to access footbridge over river.



Figure 3: Steep, uneven & slanting steps to access footbridge over



Figure 4: Typical standard of the footpath

4C PHOTOS SHOWING PROPOSED SITE AREA



