



Our Ref: A102547  
Date: 22 February 2018

FAO Mr Justin Jones  
Strategic Planning, Highways & Traffic & Transportation  
County Hall  
Cardiff  
CF10 4UW

Dear Justin

**APPLICATION REF. 17/03034/MJR  
LAND AT DE CLARE DRIVE, RADYR, CARDIFF**

Further to consultation responses submitted in relation to the above planning application, please find a response on behalf of the Applicant to the material planning objections raised, which are summarised as follows:

- Over-development of site / density
- Relationship of proposals to surroundings
- Traffic / parking / highways matters
- Intended use of site
- Capacity of local services
- Matters regarding consultation

**Over-Development of Site / Density**

The site's planning history has established that the application site has been earmarked for residential uses as part of the initial outline planning application for the wider land – specifically a residential care home (application ref. 01/2140/W).

The subsequent Development Framework submitted as part of the reserved matters application in 2005 (application ref. 05/00735/W) confirmed the site as the position of the care home (however, as you are aware, in accordance with the Section 106 Agreement, the site is now available for development for general residential use, as the Council did not take up the option to develop the care home within the timeframe set out within the Section 106 Agreement).

Referring back to the Design Framework for the 2005 application this specifically states in Section 5 that:

- "In order to contain the open spaces the central perimeter blocks will be of a higher density than the areas located along the boundaries of the site"
- "Key frontages will define the public realm by increasing the scale of buildings fronting onto the space with 3 and 4 buildings"

Our proposal accords with this guidance. The site was envisaged to be a care home which is similar in character to what is being proposed on only half of the total site. It is also the case that the surrounding buildings fronting onto the open space are large 3 storey blocks with pitched roofs and our proposal is consistent with this.





The density of a care home facility as originally proposed for the site is therefore established as being appropriate. It is therefore considered that the density of the affordable housing scheme proposed by the current application is similarly appropriate. It is the case that the development density proposed is not excessive within this context.

Furthermore, we would reiterate the position regarding the demand for housing / affordable housing. The Council's housing land supply stands at just 3.8 years, and there is an evidenced demand for affordable housing in this location. As such, the density proposed is considered acceptable in that 36 affordable dwellings can be provided for the local community on a sustainably located and under-utilised site, as part of a scheme which is acceptable in all respects.

### **Relationship of Proposals to Surroundings**

Concern is expressed by local residents that the development is 'out of keeping' with its surroundings. However, the proposed development has been designed so as to comply with the relevant LDP design policies and the guidance set out in the Council's Residential Design Guide.

The design approach taken in terms of height and massing is considered to closely reflect that of the surrounding residential estate, and the layout respects the existing 'block' street pattern with soft landscaping provided around the block to soften the appearance of the built form in the context of the surrounding roads. Although the maximum ridge height of the proposed development exceeds that of surrounding buildings at some points, the highest buildings on the site have been positioned overlooking the public open space, and it has been ensured that the relevant amenity standards set out in the Residential Design Guide have been generally met. As we have discussed all of the gardens for the houses are DQR compliant – they are all over 40sqm as required by the WG for grant funding purposes. This is a relevant consideration which confirms that they are of a more than suitable size.

As indicated above it should be noted that surrounding properties to the open space are typically of 3 storeys in height, and as such, the 3-storey development proposed cannot be considered substantially overbearing.

In addition the scheme is policy compliant in regards to all aspects of amenity standards. Appropriate provision for bin storage is included within the courtyard and provides separate bins for general waste and recycling to ensure storage of bins does not detract from the streetscene. No public open space is provided on the site itself, in light of the existing area of recreation/play space located immediately to the north of the site.

### **Traffic / Parking / Highways Matters**

Concern is expressed by local residents that the application is not supported by a sufficient and credible assessment of the impact of the proposed development in highways terms. The application is supported by a Transport Statement – for a development of the scale proposed, this represents an appropriate assessment of traffic impact of an appropriate scale and nature (Cardiff Council's SPG on 'Access, Circulation and Parking Standards' sets out the threshold of development for the requirement of traffic impact study and states that for a residential development of between 20 and 80 dwellings, a Transport Statement should be submitted in support of the planning application).





The impact of the proposed development on highway safety within an area which is perceived as suffering busy traffic levels is raised as a concern within the consultation responses. However, the applicant would draw attention to the forecast traffic generation associated with the proposed residential units, which is of a low level with approximately only 10 vehicles in 2-way movements predicted during the peak periods. As set out within the Transport Statement, this is equivalent to 1 additional vehicle every 6 minutes, and such a minor increase in traffic flow will not be a noticeable and will fall within the bounds of normal daily fluctuations in traffic flows along local highway network. The scale of the proposed development will have no significant impact upon traffic movements / safety on the surrounding road network.

Concern is raised locally in regards the level of car parking provided as part of the proposed development, and it is contended within consultation responses that the arguments used to justify the lower level of provision are flawed as the site is a significant distance from public transport and other facilities. However, it should be noted that a full audit of the site's accessibility to public transport and local services and facilities has been undertaken and is set out within Section 4 of the Transport Statement. This audit concludes that a suite of local services and facilities, required on a day-to-day basis, and including the train station, are accessible from the proposed site on foot and by bicycle – thus, active and sustainable modes of transport, primarily walking and cycling, offer a viable and realistic alternative to the private car for local trips. The accessibility audit and the Transport Statement as a whole have been undertaken in accordance with national and local planning policy and guidance, and as such, the conclusions are robust.

Furthermore, and notwithstanding the fact that a lower level of car parking provision can be justified on the site, the scheme provides a significant number of car parking spaces in any case. The scheme is for 100% affordable housing and 34 parking spaces are proposed. The guidance in the LPA's SPG recognises that the minimum level of parking for affordable schemes can be half of the open market requirement. Utilising the relevant standards set out in the Council's 'Access, parking and Circulation' SPG, the proposed development requires a minimum of 22 car parking spaces and 9 visitor parking spaces to be provided. The scheme provides a total of 34 parking spaces – this level of parking therefore accords with the adopted parking standards and this demonstrates that no parking issues will result.

### **Intended Use of Site**

In regard to concern expressed relating to the fact that the application site has not been used for its intended use (i.e. a care home), as set out above, it is the case that in accordance with the Section 106 Agreement, the site is available for development for general residential use, as the Council did not take up the option to develop the care home within the timeframe set out within the Section 106 Agreement. This matter, and the associated request for evidence to demonstrate that a rigorous effort was made to put the site to a care home use, are out of the control of the Applicant.

### **Capacity of Local Facilities**

Express is raised by local residents regarding the impact of the proposed development in terms of capacity of local services and facilities – specifically, capacity in terms of doctors and dentists locally is raised as an issue. However, the applicant would note that the operation of local health services are not within their remit/control. In regards to educational financial contributions by way of a Section 106 agreement, the Council will consider the matter of planning obligations in accordance with adopted policy accordingly.





## **Matters Regarding Consultation**

The applicant has undertaken statutory pre-application consultation in accordance with the requirements of the Planning (Wales) Act 2015, and in addition, has undertaken further discretionary consultation through a public exhibition.

### **Summary**

We trust that the above if of use, however if there is anything further that you require please let me know.

Yours sincerely,



**Jon Hurley**  
**Associate Director**

For and on behalf of  
WYG Environment Planning Transport Ltd

