

# Planning Statement

Land off Radyr Court Close  
Cardiff

July 2023

**amity**  
planning consultants



## Introduction

### Client

This statement has been prepared on behalf of Wales and West Housing.

### Scope

This Planning Statement accompanies a full planning application for residential development comprising 8 no. affordable housing units, together with road and drainage infrastructure, landscaping, amenity areas and other associated works on land at Radyr Court Close, Cardiff.

The aim of this statement is to provide a balanced justification for the proposed development and demonstrate:

- The site context and how it informs the proposals;
- The need for the proposed development;
- How the proposed development accords with relevant national, regional and local planning policies; and
- How the scheme has responded to other material planning considerations.

## Site Details

### Site Location

**Fig.1 Site Location Plan and Aerial View**



Site Description	<p>The Site comprises of two distinct parcels of land, lying to the north and south of Radyr Court Close. The parcels primarily comprise of green space within the ownership of Wales and West Housing Association, although the northern parcel also incorporates a small area of adopted highway.</p> <p>The northern parcel is the larger of the two, and the one proposed for residential development. Notwithstanding that it is in private ownership, this parcel is currently maintained by Wales and West Housing Association and is within private ownership. The parcel is fenced off and secured for use by Wales &amp; West Housing residents. The southern parcel is also maintained by and within Wales &amp; West Housing ownership. The parcel is enclosed by low-level railings, with public access provided via rail gates. There is currently no vehicular access into this parcel. To the north the parcel fronts onto a pedestrian footpath, and to its other boundaries it fronts on to adopted highway. Beyond the immediate site boundaries, existing residential properties lie to the north, west and south, and the River Taff to the east. Radyr Court Close to the west of the site is a cul-de-sac serving a parking court for residents of an existing Wales &amp; West Housing housing estate. A grass bund is located between Radyr Court Road and the River Taff.</p> <p>Site topography is varied. There is a high point roughly centrally within the parcel, and the land falls gently outwards towards the boundaries. The northern corner of the eastern boundary fronts a narrow verge containing two semi-mature trees. One further tree stands on the south-eastern corner.</p> <p>The southern parcel is the smaller parcel. It comprises of heavily undulating green space with two mature trees. This parcel of land is also maintained by Wales &amp; West Housing, but is not enclosed.</p>
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<b>Relevant Planning Policy</b>
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Cardiff Local Development Plan (2006-2026)	<p>In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the development plan unless material considerations indicate otherwise.</p> <p><b>Cardiff Local Development Plan 2006 - 2026</b></p> <p>On the 28th January 2016 the Council adopted a Local Development Plan for Cardiff. The LDP became operative on its adoption and now forms the development plan and will be the basis for decisions on land use planning in Cardiff.</p> <p>The introduction of the LDP provides a brief summary of the local planning framework as follows:</p> <ol style="list-style-type: none"> <li>1. Making provision for new homes and jobs</li> <li>2. Putting in place a framework to manage future growth and encourage high quality, sustainable design</li> <li>3. Bringing forward new infrastructure</li> <li>4. Delivering sustainable transportation solutions</li> <li>5. Responding to evidenced economic needs</li> <li>6. Responding to evidenced social needs</li> <li>7. Respecting Cardiff's environment and responding to climate change</li> </ol> <p>The Adopted LDP is accompanied by a Proposals Map that shows the policy designations across the borough. In accordance with this map, the application site is subject to the following LDP designations:</p> <ul style="list-style-type: none"> <li>• Within the settlement boundary for Cardiff</li> <li>• Within the River Corridor (Policy EN4)</li> </ul>
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**Fig.4 Adopted LDP Proposals Map**



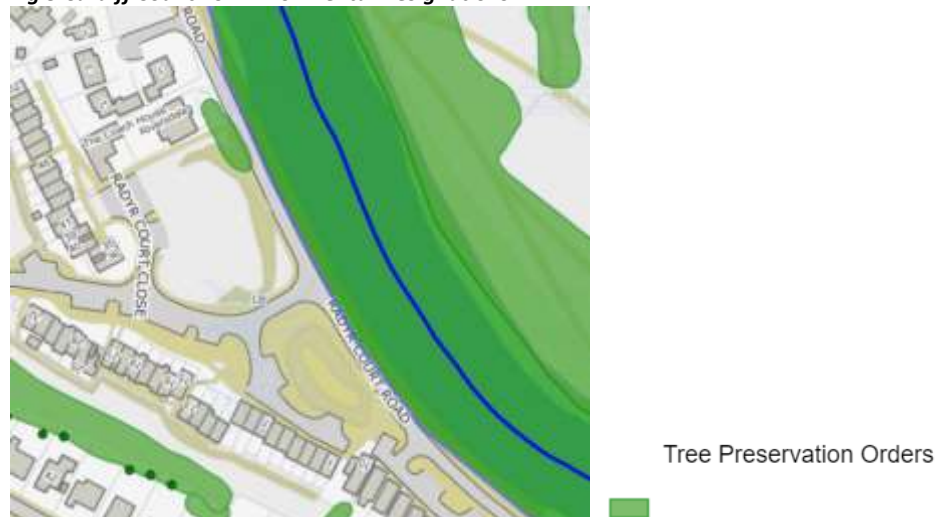
Other policy designations excluded from the LDP Proposals Map have been reviewed to conduct a more comprehensive appraisal of the site and its setting. In terms of environment, neither Locally Listed Building nor Listed Building have been identified. However, the following two assets have been identified (see Figure 4):

- The existing trees on the northern-east corner of the site are designated under Tree Protection Order (TPO No.28: ref: G11)
- The River Taff is a Site of Importance for Nature Conservation (SINC).

Flood risk modelling data is not part of the Adopted LDP. Natural Resource Wales (NRW) Flood Risk Maps are the baseline to assess the extent of flood risk in any specific location in Wales.

In accordance with TAN 15 Development Advice Map (DAM), most of the site has been identified within Flood Zone C1 which means land served by significant infrastructure, including flood defences. The forthcoming new TAN 15 and Flood Map for Planning indicates a mixture of Flood Zones 2 and 3 within defended zone.

**Fig.5 Cardiff Council's Environmental Designations**



**Fig.6 Flood risk (Left: Development Advice Map; Right: Flood Map for Planning)**



Taking into account the designations above and the nature of the proposed development, the following DP policies have been identified as relevant to assess and determine the planning application.

Policy KP5 'Good Quality and Sustainable Design'

This policy lists a range of measures to ensure that development delivers high quality sustainable design. It interprets the concept of good design beyond aesthetic considerations. High quality design is also recognised as a means for tackling climate change, protecting and enhancing Cardiff's natural and built environment, to name a few.

The following criteria are considered relevant to the development proposals:

- i. Responding to the local character and context of the built and landscape setting so that layout, scale, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage are all addressed within development proposals.
- ii. Providing legible development which is easy to get around and which ensures a sense of continuity and enclosure.
- iii. Providing a diversity of land uses to create balanced communities and add vibrancy throughout the day.
- iv. Providing a healthy and convenient environment for all users that supports the principles of community safety, encourages walking and cycling, enables employment, essential services and community facilities to be accessible by sustainable transport and maximises the contribution of networks of multi-functional and connected open spaces to encourage healthier lifestyles.
- v. Maximising renewable energy solutions.
- ix. Promoting the efficient use of land, developing at highest practicable densities and where appropriate achieving the remediation of land contamination.
- x. Ensuring no undue effect on the amenity of neighbouring occupiers and connecting positively to surrounding communities."

Policy KP6 'New Infrastructure'

It is aimed to ensure that new developments, irrespective of their size, location, or land use, make appropriate provision for infrastructure.

“Essential / Enabling Infrastructure:

- Transportation and highways including access, circulation, parking,
- Public transport provision, walking and cycling;
- Utility services;
- Flood mitigation / defences”

“Necessary Infrastructure:

- Affordable Housing;
- Community safety initiatives;
- Open space, recreational facilities, playgrounds, allotments;
- Protection, management, enhancement and mitigation measures relating to the natural and built environment;
- Waste management facilities including recycling and services”

Subsequent policies in the Adopted LDP specify the details of such infrastructure provision.

Policy KP7 ‘Planning Obligations’

Planning obligations are a means of overcoming obstacles to the grant of planning permission. They are attached to planning permissions and are commitments by developers to undertake necessary works or make financial contributions that cannot be secured by condition or other statutory means.

This policy establishes that “planning obligations will be sought to mitigate any impacts directly related to the development and will be assessed on a case by case basis in line with Planning Policy Guidance”. In particular, the SPG Planning Obligations has been extensively reviewed below to demonstrate how this application will meet the requirements on open space which is a key planning

Policy KP8 ‘Sustainable Transport’

The purpose of this policy is to ensure that developments are properly integrated with the transport infrastructure necessary to make developments accessible by sustainable travel modes and achieve a necessary shift away from car-based travel

These are the relevant requirements to make the proposed scheme contributing towards low-carbon mobility.

- “Achieve the target of a 50:50 modal split between journeys by car and journeys by walking, cycling and public transport.
- Reduce travel demand and dependence on the car;
- Enable and maximise use of sustainable and active modes of transport;
- Integrate travel modes;
- Provide for people with particular access and mobility requirements;
- Improve safety for all travellers”

Policy KP12 ‘Waste’

It is aimed to support sustainable waste management in all aspects. It is relevant to our proposals the third requirement which states that waste will be managed by “supporting the provision and maintenance of sustainable waste management storage and collection arrangements in all appropriate new developments”

#### Policy KP13 'Responding to Evidenced Social Needs'

This policy covers a range of measures to develop sustainable neighbourhoods, tackle deprivation and improve the quality of life for all.

The most relevant measure is the first one which seeks the provision of “range of dwelling sizes, types and affordability including seeking to provide a target of 6,646 affordable dwellings over the remaining 12 years of Plan period”.

#### Policy KP15 'Climate Change'

This Policy provides a framework for sustainable growth by promoting development that mitigates the causes of climate change and which is able to adapt to its likely effects. New development should be adhered to the following factors as relevant to the proposals:

- i. “Reducing carbon emissions;
- iv. Promoting energy efficiency and increasing the supply of renewable energy;
- v. Avoiding areas susceptible to flood risk; and
- vi. Preventing development that increases flood risk.”

#### Policy KP16 'Green Infrastructure'

This policy aims to ensure that Cardiff's green infrastructure assets are strategically planned and delivered through a green infrastructure network. It states that “proposed development should therefore demonstrate how green infrastructure has been considered and integrated into the proposals”. It goes on to say that if development results in overall loss of green infrastructure, appropriate compensation will be required”.

#### Policy H3 'Affordable Housing'

The aim of this Policy is to assist the Council to meet evidenced housing need by seeking an appropriate affordable housing contribution from new residential developments in the city. It echoes the approach contained in Policy KP13 and should be read in conjunction with 'Planning Obligations' Supplementary Planning Guidance (SPG) for a more comprehensive understanding.

This policy sets out that “the Council will seek 20% affordable housing on Brownfield sites and 30% affordable housing on Greenfield sites in all residential proposals that:

- i. Contain 5 or more dwellings; or
- ii. Sites of or exceeding 0.1 hectares in gross site area; or
- iii. Where adjacent and related residential proposals result in combined numbers or site size areas exceeding the above thresholds, the Council will seek affordable housing based on the affordable housing target percentages set out opposite.”

It is also highlighted that “affordable housing will be sought to be delivered on-site in all instances unless there are exceptional circumstances”. The supporting text to this policy clarifies that “in negotiating affordable housing, each proposal's actual contribution will depend on that scheme's capacity for provision. This will ensure that the affordable housing contribution in itself will not make the scheme unviable”.

#### Policy EN4: River Corridors

The Policy provides a planning framework within which the Council can protect, promote and enhance the river corridors.

It stipulates that “the Natural Heritage, character and other key features of Cardiff’s river corridors will be protected, promoted and enhanced, together with facilitating sustainable access and recreation”

#### Policy EN6: Ecological Networks and Features of Importance For Biodiversity

This Policy aims to protect Cardiff’s ecological networks and landscape features that are important for biodiversity. It sets out that “development will only be permitted if it does not cause unacceptable harm to:

- i. Landscape features of importance for wild flora and fauna, including wildlife corridors and ‘stepping stones’ which enable the dispersal and functioning of protected and priority species;
- ii. Networks of importance for landscape or nature conservation”

Most interestingly, this policy also highlights that “where this is not the case and the need for the development outweighs the nature conservation importance of the site, it should be demonstrated that there is no satisfactory alternative location for the development and compensatory provision will be made of comparable ecological value to that lost as a result of the development”.

#### Policy EN7: Priority Habitats and Species

This Policy is in accordance with the aims and objectives of the Plan by protecting and enhancing the features of Cardiff’s natural heritage, including its biodiversity and abundance of wildlife habitats and native species.

This policy establishes that “development proposals that will have a significant adverse effect on the continued viability of habitats and species which are legally protected, or which are identified as priorities in the UK or Local Biodiversity Action Plan will only be permitted where:

- i. The need for development outweighs the nature conservation importance of the site;
- ii. The developer demonstrates that there is no satisfactory alternative location for the development which avoids nature conservation impacts; and
- iii. Effective mitigation measures are provided by the developer.

It goes on to say that “where harm is unavoidable it should be minimised by effective mitigation to ensure that there is no reduction in the overall nature conservation value of the area. Where this is not possible compensation measures designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species should be provided”.

#### Policy EN8: Trees, Woodlands and Hedgerows

Trees, woodlands and hedgerows offer multiple benefits, including visual amenity, defining a sense of place, providing places for relaxation and recreation, habitats for wildlife, improved health and wellbeing and mitigating the effects of climate change.



Thus, this policy set out that “development will not be permitted that will cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value, or that contribute significantly to mitigating the effects of climate change.”

#### Policy EN10 ‘Water Sensitive Design’

It seeks new development to integrate water sensitive urban design solutions to its design. “To include the management of:

- i. Water demand and supply;
- ii. Waste water and pollution;
- iii. Rainfall and runoff;
- iv. Watercourses and water resource;
- v. Flooding; and
- vi. Water pathways”.

#### Policy EN11 ‘Protection of Water Resources’

It states that “development will not be permitted that will cause unacceptable harm to the quality or quantity of underground, surface or coastal waters.”

#### Policy EN12 ‘Renewable Energy and Low Carbon Technologies’

This policy establishes that “development proposals are required to maximise the potential for renewable energy”. It expands further for development in major and strategic sites. It is also recognised the importance of minimising carbon emissions associated with the heating, cooling and power systems within the development.

#### Policy EN14 ‘Flood Risk’

The purpose of this Policy is to avert development from where it will be at risk from river, ordinary watercourse, coastal, surface water flooding or where it will increase the risk of flooding or additional run off from development elsewhere. It states that “development will not be permitted:

- i. Within tidal or fluvial flood plains unless it can be demonstrated that the site is justified in line with national guidance and an appropriate detailed technical assessment has been undertaken to ensure that the development is designed to alleviate the threat and consequences of flooding over its lifetime;
- ii. Where it will increase the risk of flooding from fluvial and/or tidal flooding or from additional run-off from the development in any location;
- iii. Where it will hinder future maintenance or improvement schemes of flood defences and watercourses
- iv. Where it will cause adverse effects on the integrity of tidal or fluvial defences
- v. Where ground floor bedrooms are proposed in areas at high risk of flooding. Where appropriate the developer should demonstrate that they have considered the need to incorporate environmentally sympathetic flood risk mitigation measures such as Sustainable Urban Drainage Systems (SUDS).”

This policy also addresses the issue of flooding from surface water and advises that “where appropriate the developer should demonstrate that they have considered the need to incorporate environmentally sympathetic flood risk mitigation measures such as Sustainable Urban Drainage Systems (SUDS)”.

#### Policy T1 'Walking and Cycling'

The purpose of this Policy is to exploit this potential by favouring developments which include design features and facilities that make it easy for people to walk and cycle for everyday journeys instead of travelling by car.

As relevant to the development proposals, this policy states that "the Council will support developments which incorporate:

- v. Safe, convenient and attractive walking and cycling connections to existing developments, neighbourhoods, jobs and services;
- vii. Supporting facilities including, signing, secure cycle parking and, where necessary, shower and changing facilities."

#### Policy T5 'Managing Transport Impacts'

The purpose of this Policy is to ensure that all new developments "properly address the demand for travel and its impacts, contribute to reducing reliance on the private car" and "make satisfactory provision for access, parking and circulation, particularly by pedestrians, cyclists, public transport users and disabled people with mobility impairments and particular access needs".

#### Policy T6 'Impact on Transport Networks and Services'

In essence, this policy sets out that development will not be permitted when it will unacceptably harm the safe and efficient operation of the highway, public transport and other networks (such as pedestrian and cycle routes).

#### Policy C3 'Community Safety/Creating Safe Environments'

This policy requires all new development to promote a safe and secure environment and minimise opportunities for crime. In accordance with the proposals, "development shall:

- i. Maximise natural surveillance of areas which may be vulnerable to crime such as publicly accessible spaces, open space, car parking areas and footpaths;
- iii. Maintain perceptible distinction between public and private spaces through well-defined boundaries and defensible space;
- iv. Provide a good standard of lighting to public spaces and routes while minimising energy use and light pollution; and
- v. Be designed with management and maintenance in mind, to discourage crime in the present and future."

#### Policy C4 'Protection of Open Space'

Development will not be permitted on areas of open space unless:

- i. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study; and
- ii. The open space has no significant functional or amenity value; and
- iii. The open space is of no significant quality; or
- iv. The developers make satisfactory compensatory provision; and, in all cases;
- v. The open space has no significant nature or historic conservation importance.

	<p><u>Policy C5 ‘Provision for Open Space, Outdoor Recreation, Children’s Play and Sport’</u></p> <p>This policy is aimed at securing the provision or improvement of open space and other appropriate outdoor recreation and sport in conjunction with all new residential developments over 8 units and on-site provision of functional open space in conjunction with all new residential developments over 14 units.</p> <p>It is relevant where the policy establishes that “the amount of open space provision generated by a housing proposal will be assessed in relation to its type and density. Consideration will also be given to the availability and adequacy of existing functional open space within the surrounding area.”</p> <p><u>Policy W2 ‘Provision for Waste Management Facilities in Development’</u></p> <p>This policy sets out that “where appropriate, provision will be sought in all new development for facilities for the storage, recycling and other management of waste”.</p> <p>Supporting text provides further guidance on how to achieve sustainable waste management. “All developments will be to provide:</p> <ul style="list-style-type: none"> <li>• On-site waste, recycling and composting, separation and storage facilities;</li> <li>• Communal waste, recycling and composting, separation and storage facilities for larger developments; and,</li> <li>• Access arrangements for refuse vehicles and personnel for collection purposes”</li> </ul>
<p>Future Wales – The National Plan (2040)</p>	<p>Future Wales is the national development framework and sets out the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system.</p> <p>‘Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking’ is of significant relevance to the proposed development and establishes the following guidance:</p> <p>“The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles:</p> <ul style="list-style-type: none"> <li>• creating a rich mix of uses;</li> <li>• providing a variety of housing types and tenures;</li> <li>• building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;</li> <li>• increasing population density, with development built at urban densities that can support public transport and local facilities;</li> <li>• establishing a permeable network of streets, with a hierarchy that informs the nature of development;</li> <li>• promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and</li> <li>• integrating green infrastructure, informed by the planning authority’s Green Infrastructure Assessment.</li> </ul>

Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time.”

Planning Policy Wales (2021)

**Planning Policy Wales (11th Edition, February 2021)**

Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions. Paragraph 2.8 acknowledges that “planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales” and “the most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making planning policy and decision making” as per Paragraph 2.9.

PPW defines placemaking as a “holistic approach to the planning and design of development and spaces, focused on positive outcomes”. This approach “considers the context, function and relationships between a development site and its wider surroundings” and “adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary”.

Figures 4 and 5 of PPW (see Figure 2 below) set out the Key Planning Policies and the National Sustainable Placemaking Outcomes which bring about sustainable development and, in particular, inform the preparation of development plans and the assessment of development proposals.

**Fig.3 Key Planning Policies and the National Sustainable Placemaking Outcomes (extract from PPW 11)**



Having broadly regard to the PPW framework, the following content is deemed pertinent to the determination of this application.

Good design

Paragraph 3.3 confirms that “design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places”. PPW 11 sets out five key aspects of good design as follows:

1) *Access and Inclusivity*

This can be achieved “making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children” (Paragraph 3.6) and through measures and features that “enable easy access to services by walking, cycling and public transport” and “encourage people to meet and interact with each other”.

2) *Environmental Sustainability*

Paragraph 3.7 states that “developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement (Paragraph 3.7)” and be resilient through “an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment”

Paragraph 3.8 highlights that “landscape and green infrastructure considerations are an integral part of the design process” and, in a similar manner, addressing land contamination, instability and flood risk and providing for biodiversity benefits should be part of the design.

### 3) *Character*

Paragraph 3.9 highlights that “the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations”. It goes on to say that “the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials” will be particularly important in areas recognised for their particular landscape, townscape, cultural or historic character and value.

Paragraph 3.11 establishes that “crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions”

### 4) *Movement*

Paragraph 3.12 states that good design in this matter means “minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys”. It also remarks that “existing infrastructure must be utilised and maximised, wherever possible”.

### Transport

Paragraph 4.1.11 sets out that “development proposals must seek to maximise accessibility by walking, cycling, and public transport, by prioritising the provision of appropriate on-site”. In this respect, “the sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications” as per Paragraph 4.1.14. The Welsh Government policies set out the sustainable transport hierarchy which is, in this order, from walking and cycling, public transport, ultra-low emissions vehicles to other private motor vehicles.

Active travel is a cornerstone of the transport policies in Wales. Paragraph 4.1.31 confirms that “planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling”.

With regards to vehicle parking, Paragraph 4.1.50 advises that a design-led approach should ensure that “appropriate level of car parking is integrated in a way which does not dominate the development”. Paragraph 4.1.35 requires new development to “provide appropriate levels of secure, integrated, convenient and accessible cycle parking”.

### Housing

Paragraph 4.2.1 advises that “new housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities”.

Paragraph 4.2.17 acknowledges the potential on brownfield sites to deliver further housing when saying that “maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites”.

#### Open space

Paragraph 4.5.2 states that “planning authorities should provide a framework for well-located, good quality sport, recreational and leisure facilities, and develop clear policies for the provision, protection and enhancement of sport, recreation and leisure facilities”. It goes on to say that “these policies should set standards of provision, so that local deficiencies can be identified and met through the planning process and set out policies to avoid or resolve conflict between different activities”.

Paragraph 4.5.2 highlights that “formal and informal open green spaces should be protected from development, particularly in urban areas where they fulfil multiple purposes” and acknowledges the role of open space in “enhancing quality of life” and contributing to “biodiversity, the conservation of the historic environment, nature and landscape, better air quality, the protection of groundwater and as places of tranquillity” in conjunction with “a role in climate protection and in enabling the adaptation of urban areas to the impacts of climate change”.

#### Green infrastructure

Paragraph 6.2 defines green infrastructure as “the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places” and “at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks”

Paragraph 6.2.5 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that “with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places”. It is also advised that “there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents”.

Paragraph 6.4.21 establishes that “planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible”.

#### Water management

Paragraph 6.6.25 states that “development should reduce, and must not increase, flood risk arising from river and/or coastal flooding on and off the development site itself”.

With regard to flooding from surface water, Paragraph 6.6.27 advises that “developments are designed and planned to minimise potential impacts” and goes on to say that “development should not cause additional run-off, which can be achieved by controlling surface water as near to the source as possible by the use of SuDS”.

Paragraph 6.6.9 indicates that “the adequacy of water supply and sewerage infrastructure should be fully considered when proposing development, both as a water service and because of the consequential environmental and amenity impacts associated with a lack of capacity”.

	<p>Paragraph 6.6.18 recommends that “the provision of SuDS must be considered as an integral part of the design of new development and considered at the earliest possible stage when formulating proposals for new development”.</p>
<p>Technical Advice Notes</p>	<p>Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:</p> <ul style="list-style-type: none"> <li>• TAN 2: ‘Planning and Affordable Housing’ (June 2006);</li> <li>• TAN 5: ‘Nature Conservation and Planning’ (September 2009);</li> <li>• TAN 10: ‘Tree Preservation Orders’ (October 1997);</li> <li>• TAN 12: ‘Design’ (March 2016)</li> <li>• TAN 15: ‘Development and Flood Risk’ (2004)</li> <li>• TAN 16: Sport, Recreation and Open Space (January 2009)</li> <li>• TAN 18: Transport (2007).</li> </ul> <p>As described below in the section of ‘Analysis’, considerations on open space are paramount to establish the appropriateness of developing the proposed site. It is therefore deemed adequate to expand on TAN 16: Sport, Recreation and Open Space and highlight its relevant content to the proposals.</p> <p><u>TAN 16: Sport, Recreation and Open Space (January 2009)</u></p> <p>Paragraph 2.11 states that “the Fields in Trust (FIT) ‘Benchmark Standards’ recognise that local authorities may wish to set their own standards using other assessment tools” although they “recommend provision for children’s outdoor playing space of 0.25ha per 1,000 population for ‘Designated Equipped Playing Space’, 0.55ha for ‘Informal Playing Space’ and 0.80ha for ‘Children’s Playing Space’.</p> <p>It goes on to set out that the standards “also provide guidance on appropriate levels of accessibility with ‘local areas’ for play or informal recreation within 100metres of homes, ‘locally equipped or landscaped areas’ within 400 metres, and ‘neighbourhood equipped areas’ providing for the needs of children and young people within 1,000 metres”.</p> <p>With regard the relationship between new development and the protection of existing sport and recreation facilities and open spaces, Paragraph 3.5 states that “some forms of development, for example housing, may affect the use of remaining playing areas, and the possible benefits offered by such development should be weighed against the possible effects on open space, which may occur”.</p> <p>Regarding new open space and recreation facilities, TAN 16 advises to the local planning authorities that “rather than applying blanket standards of open space and recreational provision to all new developments, consideration should be given to how the new development relates to the priorities established in the LDP”. It goes on to point out that “this may require a contribution to enhancing off-site facilities, paths and towpaths or spaces, for example where the development concerned gives rise to an additional need, rather than direct on-site provision”.</p>

Supplementary  
Planning  
Guidance

Supplementary Planning Guidance (SPG) is produced to provide further detail on certain policies and proposals contained within Cardiff's Development Plan. They help ensure that certain policies and proposals are better understood and applied effectively.

SPG do not have the same status or weight as adopted Development Plan policies. However, the Government advises that they may be taken into account as a material consideration in determining planning applications.

It is of particular relevance for the development proposals the following SPG documents:

- Green Infrastructure SPG, specifically "Protection and Provision Of Open Space In New Developments Technical Guidance Note (November 2017)"
- Managing Transportation Impacts (Incorporating Parking Standards) (July 2018)
- Planning obligations (January 2017)
- Residential Design Guide (January 2017)
- Waste Collection & Storage Facilities (October 2016)

1. Protection And Provision of Open Space In New Developments Technical Guidance Note (November 2017) within Green Infrastructure SPG

The Guidance explains the Council's approach towards safeguarding existing areas of open space which contribute to the recreational, amenity or nature conservation resources of the city. It sets out the basis upon which open space provision for new housing developments are assessed, including how much open space is to be provided and what type of provision will be sought.

For the purposes of this document and the proposed development hereby assessed, the following definitions set out in Paragraph 1.4 apply:

- *Open space* "should be regarded as all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport, recreation and tourism, and can also act as a visual amenity, and may have conservation".
- *Public open space* "is often used interchangeably with the term open space and in legal terms, the definition is the same"
- *Functional open space* "is open space that is capable of defined recreational use or multiple uses. These uses will include formal and informal sport and recreation, children's play and provision for teenagers".
- *Informal recreation* refers to "informal open space uses such as walking, jogging, cycling, informal ball games, and general leisure"
- *Amenity land* "does not have a defined formal or informal use but may enhance the setting of the development" and "will not be included in the overall functional open space calculation".
- *Children's play* relates to "areas specifically designed for children's play with fixed play activities such as swings, slides or multi-units and / or more natural play environments".

Paragraph 4.1.1 stipulates the criteria that should guide the Council's assessment on development proposals which involve the loss of open space.

- i. Existing local provision of open space (4.2)
- ii. The functional or amenity value of the open space (4.3)
- iii. The quality of the open space (4.4)



- iv. Any significant nature or historic conservation importance of open space which may be lost (4.5)
- v. Any compensatory provision for loss of open space (4.6)

2. Cardiff Planning Obligations SPG (January 2017)

This guidance will help to ensure that developments contribute toward the provision of necessary infrastructure and measures required to mitigate their impact.

*Assessment of Functional Open Space Provision*

Paragraph 5.4 defines functional open space (FOS) as “those areas that make provision for active sport and recreation including equipped children’s play areas, teen equipment, sports pitches and areas providing space for informal recreational use”. It does not include amenity space.

In particular, the definition of Informal Functional Open Space is also provided in Paragraph 5.13 as follows: “areas providing space for informal recreational uses e.g. walking, jogging, cycling, informal ball games, and general leisure. This includes green corridors that can be used for active recreation due to presence of a permanent hard surfaced footpath”

Paragraph 5.5 sets out that “residential developments will be expected to make provision for 2.43 hectares of functional open space per 1000 projected population” and “this is in accordance with the guidance provided through PPW Technical Advice Note 16 (Open Space) and the ‘Fields in Trust’ Benchmark Standards”.

Distances thresholds are established to ensure that functional open space is easily accessible and located in close proximity to dwellings. Paragraph 5.21 sets out these limits as follows:

- Equipped play and children’s play: 400m - 600m
- Teen equipment: 600m - 1000m
- Informal functional open space: 1000m
- Formal functional open space: 1500m

This paragraph goes on to highlight that the features and obstacles to pedestrian and cycle movement, such as major roads, railways and rivers should be taken into consideration when assessing the provision of facilities (from the edge of a development site).

Paragraphs 5.23 to 5.27 set out the methodology for calculating the amount of functional open space that must be provided for new development. Functional open space provision is calculated from the projected population of a development and the application of a minimum standard of 2.43ha per 1000 projected population. This is an aggregation of four components

- Equipped play and children’s play areas: 0.25ha
- Teen equipment: 0.30ha
- Informal functional open space: 0.68ha
- Formal functional open space: 1.20ha

The projected population for a development is calculated using occupancy rates, derived from the 2011 census:

**Fig.7 Financial Contribution in Lieu of Functional Open Space**

**Number of Bedrooms**

**Occupancy Figure  
(persons per dwelling)**

1	1.3
2	1.8
3	2.5
4	3.1
5	3.8
Where unknown	2.33 (average occupancy figure)

Paragraph 5.28 sets out that “the level of contribution is based on the cost of providing 1 hectare of functional open space, multiplied by the amount required by the proposed development”. It clarifies that “at 2016, the figure for providing 1ha of functional open space is £426,975” and this figure “will be reviewed annually in line with the Retail Price Index”.

Paragraph 5.30 advises that “a pro rata contribution will be sought in circumstances where part of the functional open space contribution is provided onsite”.

**Annual Monitoring Report**

In October 2022 Cardiff Council published their LDP 6th Annual Monitoring Report. With regard to affordable housing the report identifies that the LDP “sets a target for the delivery of 6,646 affordable units to be provided for the 12 years between 2014 and 2026 and monitoring data shows that affordable housing completions are increasing as a range and choice of new housing sites begin to come forward. The latest figures show that 1,797 new build affordable dwellings were completed since 2014, which represents 24% of total new build housing completions over this period. This trend is expected to continue as construction of the greenfield strategic housing sites gathers pace for the remaining 4 years of the Plan period.”

**Planning History**

**Planning History**

The site has one live planning application submitted by Wales & West Housing, seeking permission for the "Erection of 14 affordable houses, including access, landscaping, drainage, engineering, and other associated works."

This initial application was submitted on 22/11/22.

The current resubmission addresses the concerns raised in the ongoing application. The new proposal features a reduced density of units, updated landscaping plans with an updated FCA (Flood Consequences Assessment).

The development footprint has also been significantly reduced facilitating the retention of circa 1,428sq.m of usable open space on the northern parcel. In conjunction with the proposed additional provision of 1,394sq.m of recreational informal open space through upgrade works to the southern parcel, this would provide a total of 2,822sq.m of usable open space on the site. In terms of quantum of usable open space therefore the development would deliver a net gain of 136sq.m above and beyond the existing 2,686sq.m These adjustments aim to resolve the issues that led to the previous refusal.

**Analysis**

**Approach**

Section 38(6) of the Planning and Compulsory Act 2004 requires that, where regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, “the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

	<p>Caselaw has established the main principles relevant to determining whether a proposal is “in accordance with the plan” as follows:</p> <ol style="list-style-type: none"> <li>1. The section 38(6) duty can only be properly performed if the decision-maker establishes whether or not the proposal accords with the development plan as a whole.</li> <li>2. Development plan policies can “pull in different directions”, i.e. some may support a proposal, others may weigh against it.</li> <li>3. A decision maker is required to assess the proposal against the potentially competing policies and then “decide whether in the light of the whole plan the proposal does or does not accord with it”.</li> <li>4. This is not a mathematical or mechanical exercise. It is not a question of counting.</li> <li>5. This exercise calls for a series of judgments to be made, which may include determining the relative importance of the policy, the extent of any breach and how firmly the policy favours or set its face against such a proposal.</li> </ol>
<p>Land Use Planning</p>	<p>The principle of development in this instance is focussed on two key LDP Policies, namely:</p> <ul style="list-style-type: none"> <li>• Policy C4: Protection of Open Space</li> <li>• Policy EN4: River Corridors</li> </ul> <p><b>C4: Protection of Open Space</b> As identified in the Planning Policy section, LDP Policy C4 (Protection of Open Space) states:</p> <p><i>Development will not be permitted on areas of open space unless:</i></p> <ol style="list-style-type: none"> <li><i>i. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study; and</i></li> <li><i>ii. The open space has no significant functional or amenity value; and</i></li> <li><i>iii. The open space is of no significant quality; or</i></li> <li><i>iv. The developers make satisfactory compensatory provision; and, in all cases;</i></li> <li><i>v. The open space has no significant nature or historic conservation importance</i></li> </ol> <p>The wording is structured such that a development which falls to be considered under Policy C4 must meet criteria (v) and, beyond this, must either meet criteria (i) through to (iii) (inclusive) or, alternatively, criteria (iv).</p> <p>There follows a detailed assessment of the proposed development against these criteria.</p> <p><u>Cause or Exacerbate a Deficiency of Open Space</u> The latest open space study for Cardiff is the Cardiff Open Space Assessment 2021. Within this the northern parcel is identified as ‘Informal, Recreational Open Space’ whereas the southern parcel is identified as ‘Amenity Open Space’ (see Fig.4 below).</p> <p>The areas of the respective parcels are as follows:</p> <ul style="list-style-type: none"> <li>• Informal, Recreational Open Space (northern parcel): 2,686sq.m</li> <li>• Amenity Open Space (southern parcel): 1,394sq.m</li> </ul>

**Fig.8 Extract of Open Space Locations – Llandaff**



The Assessment identifies a breakdown of existing Open Space provision within the ward as follows:

**Fig.9 Existing Open Space provision – Llandaff**

Category	Llandaff
Amenity	33.38
Children's Play	0.23
Education	15.99
Formal	0.29
Informal	3.52
Urban Spaces	0.00
Water	6.05
<b>Grand Total</b>	<b>59.47</b>

The Assessment goes on to identify that the total existing Recreational Open Space provision (Formal, Informal and Children's Play) in the ward of 4.04ha represents a deficit of 17.56 hectares of Recreational Open Space (based on the 2.43 ha per 1000 population standard). Amenity Space is not considered to contribute towards Recreational Open Space provision and so is not measured against any standards.

The Assessment does not provide a breakdown of the shortfall in Recreational Open Space by sub-category however, using the breakdown of required provision by category from the Supplementary Planning Guidance on Planning Obligations, together with the ward population figures from the '2021 Open Space Assessment', it is possible to derive baseline requirements for the ward and calculate the amount of shortfall per sub-category.

**Fig.10 Shortfall in Open Space Provision by Sub-Category**

Open Space Category	Expected targets in Llandaff (in ha.)	Current Provision in Llandaff (in ha.)	Shortfall (in ha.)	Percentage of shortfall
Equipped Play	4.89	0.23	4.66	95.3%
Informal	6.05	3.52	2.53	41.8%
Formal	10.69	0.29	10.4	97.3%

The 17.56ha shortfall in Recreational Open Space within the ward therefore equates to shortfalls in respect of each of constituent elements of such space. There is an identified shortfall of 2.53(ha) in respect of Informal Play Space.

Without mitigation therefore the proposed development would result in a loss of 1,586sq.m of Informal Recreational Open Space (the northern parcel) from the ward of Llandaff, and further exacerbate an existing deficiency of open space in conflict with criteria (i) of Policy C4.

Amenity Space however does not contribute towards Recreational Open Space provision and so is not measured against any specific standards. As such any loss of the 1,394sq.m Amenity Space (the southern parcel) would not give rise to or exacerbate a deficiency in open space.

criteria (iv):

Satisfactory Compensatory Provision

In response to feedback received from the Local Authority, the Site was specifically extended to include the southern parcel of land in order to deliver compensatory open space. This parcel is currently identified as Amenity Space (and consequently does not contribute towards Recreational Open Space provision in the ward), presumably on the basis of its steep topography which makes it unsuitable for any recreational purposes. It is proposed to reprofile this parcel of land in order to provide an upgraded, usable area of Informal Recreational Open Space, totalling 1,394sq.m.

It is contended that the scheme offers an adequate compensatory open space provision in line with the SPG. As in conjunction with the proposed additional provision of 1,394sq.m of recreational informal open space through upgrade works as detailed above, the scheme incorporates the retention of 1.428sq.m of Open Space on the northern parcel, which would provide a total of 2,822sq.m of usable open space on the site. In terms of quantum of usable open space, the development would deliver a net gain of 136sq.m above the existing 2,686sq.m.

The compensatory open space provision within the development has been designed to further accommodate provision for Recreational Informal Children’s Play Space . It has been demonstrated the shortfall of equipped play within the Llandaff ward is substantial.

The compensatory on-site Recreational Open Space provision would therefore be as follows:

- Southern parcel: 1,394sq.m
- Northern parcel: 1,428sq.m

This would comprise of Informal Recreational Open Space together with Informal Play Space. Informal Play Space in the form of “Natural Play” has been chosen to be provided due to direct engagement with local residents.

**Fig.11 Landscaping Plan (Northern & Southern Parcel)**



Significant Nature or Historic Conservation Importance

The parcel of land has no significant nature conservation interest, as addressed elsewhere within the Ecology section of this document, and nor does it have any heritage designation or interest.

Meeting the needs of the Development

To calculate the required amount of functional open space for the new development, the formula set out in Cardiff Planning Obligations SPG has been used and the calculation is as follows:

$$\frac{(14 \times 1.8) \times 2.43}{1000} = 0.061236 \text{ ha.}$$

A breakdown of open space per each functional category is also provided:

Equipped Play & Children's Play	0.0063
Teen Equipment	0.00756
Informal Functional	0.017136
Formal Functional	0.03024
<b>TOTAL</b>	<b>0.061236</b>

In principle, the figures above indicate both the total amount of functional open space and the proportional amounts per each open space category that should be provided by reason of new development. According to the Cardiff Planning Obligations SPG, this should ideally be delivered on-site, of which the proposed scheme is compliant.

The Cardiff Planning Obligations SPG furthermore states that proposals will be assessed on a site by site basis, having regard to the open space function of the resource to be lost and the needs of the locality.

The quantity and community benefit of the compensatory area should be at least equal to the scale and type of the functional open space being lost. The scheme not only provides a larger quantity of Functional Open Space on site to what is being lost, but provides a betterment in regards to meeting the acute shortfall of Childrens Play Space within the ward.

#### **EN4: River Corridors**

LDP Policy EN4 (River Corridors) states:

*The Natural Heritage, character and other key features of Cardiff's river corridors will be protected, promoted and enhanced, together with facilitating sustainable access and recreation.*

As explored elsewhere in this document, the proposed development would not give rise to an adverse impact on the natural heritage, character or any other key features of the river corridor.

#### **Conclusion**

Without mitigation, the development would give rise to the loss of 2,686sq.m of Informal Recreational Open Space, exacerbating an existing deficiency of both informal open space and overall recreational provision within the ward of Llandaff. The development itself would also generate a requirement for 0.06ha of Recreational Open Space provision.

As a result there is no net loss of Informal Recreational Open Space as a result of the development, and any such loss can be fully mitigated for on-site in terms of quantum. Furthermore, a portion of the site is currently unused and is being upgraded to a useable open space. It is considered that the development is able to deliver a good quantum of satisfactory, usable and high-quality Informal Open Space, and betterment in the form of Informal Play Space, in respect of which there is no local provision and an acute shortfall in the ward as a whole. There would be no adverse impact on the natural heritage, character or any other key features of the river corridor. In this regard it is concluded that the development would comply with the requirements of LDP Policies C4 and EN4.

#### **Affordable Housing**

In accordance with Cardiff LDP 6th Annual Monitoring Report (October 2022), the Adopted LDP sets a target for the delivery of 6,646 affordable units to be provided between 2014 and 2026. The monitoring reveals that 1,797 new build affordable dwellings were completed between 2014 and 2022. Whilst the Monitoring Report claims that this is evidence of 'good progress' being made in delivering affordable housing to meet the identified affordable housing need, in reality this means that just 27% of the need has been met, despite being two-thirds of the way through the plan period.

Moreover Wales & West Housing, through dialogue with the Council's housing officer, have identified an acute housing need specific to the ward of Llandaff, which is unlikely to be met in the near future through existing allocations/commitments. It has been confirmed that there are just under 8,000 households on the waiting list for Cardiff (30% of which are for 2-beds properties.) and 3,066 applicants on the waiting list for Llandaff & Llandaff north (of which 858 need 2-bedroom properties).

The 8 new affordable homes which would be delivered as a result of the proposed development would make a significant contribution to addressing the acute shortfall in affordable housing delivery within Cardiff as a whole and, specifically, the ward of Llandaff. The development would therefore fully comply with LDP policies KP13 and H3 and the delivery of 8no. affordable housing units in the face of acute shortfalls and under-delivery should be afforded significant weight.

## Design and Character

A site and context analysis has been carried to interpret the site itself and its surroundings. The findings of this assessment have been helpful to inform the design of new development. As a result, the following vision objectives have been set out:

- Erection of 8 dwelling houses with a specific tenure to cater to the demand of affordable housing within the area.
- Seamless connection to the existing highway infrastructure through new roadway that will be adapted to the site constraints.
- Upgrading the access arrangements including appropriate visibility splays for vehicle access, as well as new pedestrian links to promote active travel.
- Biodiversity/ecology measures to retain significant elements of the site.
- Provision of 2,822sq.m of Open Space and Informal Play Space on site.

**Fig.11 Proposed Site Layout**



The proposed scheme has been designed to provide 8no. dwellinghouses. The site and context analysis has been thoughtfully concluded that there is sufficient capacity to comfortably fit 8 housing units, whilst retaining a significant level of Open Space on the northern parcel, and reprofiling the entirety of the southern parcel in order to bring it up to usable Open Space standards, totalling 2,686sq.m.

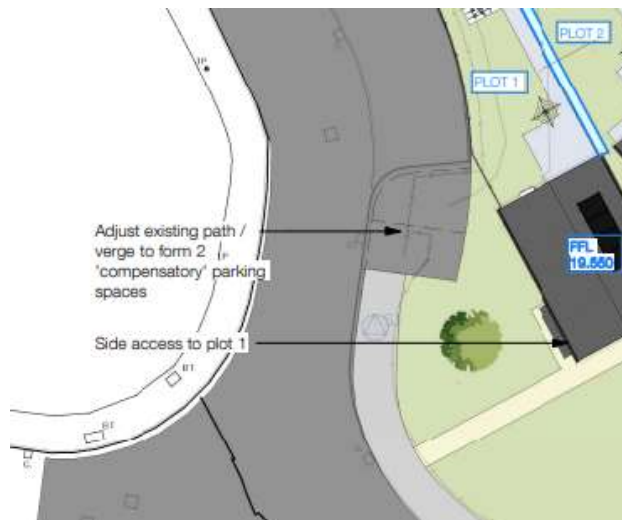
The proposed buildings reflect the architecture of the surrounding housing and the public street scene is in-keeping with the local area. The terrace layout of the housing units, as well as the blue/grey fibre cement rooves can be seen across the various residential settlements within Danescourt.



	<p>The proposed dwellings are set back from the street with landscaping to their frontages, which mirrors surrounding dwellings. Marziale brickwork will be used to create a classic look to the dwellings. The site is also extremely well connected and slots into a clear hierarchy of settlements, which are arranged around the town centre.</p> <p>The scheme incorporates thoughtful green infrastructure inclusive of on-site open space and informal green spaces between dwellings. There are 6 no. pedestrian access into the site, encouraging active travel and minimising the requirement to make short car journeys, reducing wasteful carbon dioxide emissions.</p> <p>The trees on the western boundary will also be retained and new trees will be strategically planted on site. Rain gardens and swale features will be also part of the landscaping scheme as well as the SUDS system for the whole development.</p> <p>In light of the above, it has been sought through the design of the development to deliver the National Sustainable Placemaking Outcomes. The supporting Design and Access Statement clearly demonstrates that the residential scheme has incorporated the five principles of good design.</p> <p>After undertaking the site and context analysis, the proposals have been refined through design iterations to respond to the local character and context of both built and natural environment. It is considered that active travel, good public realm and community safety have been delivered through the scheme given the site constraints.</p> <p>For the reasons above, it is concluded that the proposed development accords with the multiple policies on placemaking and design contained in PPW and Adopted LDP.</p>
Residential Amenity	<p>The site layout evidences that plots 1-8 have been appropriately set back from the nearest properties to the north-west (Riversdale House). Likewise, the separation distances between the proposed plots and properties backing onto the cul-de-sac end is large and no adverse relationship will occur. The southern portion of the northern parcel will comprise of open space, and therefore amenity standards of residents adjacent to this boundary will not be compromised.</p> <p>In terms of house type design, the internal gross floorspace areas (GIA) will be fully compliant with the Welsh Development Quality Requirements (WDQR) which will ensure good living conditions to the future occupiers. In direct response to comments received on the previous application the domestic rear gardens will measure in the region of 50 sq.m and will be convenient to use and easy to maintain. The private amenity area will be also complemented with a communal space (POS).</p> <p>In summary, the proposed development therefore will ensure no significant adverse impact upon the amenities of neighbouring occupiers and will be compatible with other uses in the locality, in accordance with LDP Policy KP5.</p>
Movement and Highway Impact	<p>The site lies adjacent to a cul-de-sac of Radyr Court Close which serves parking a parking court associated with an existing Wales &amp; West Housing housing estate. Radyr Court Road itself comprises of adopted highway, however the bays served from this are in the ownership of the applicant. The proposed parking court provides parking for 10 cars to the west of the site.</p> <p>It is proposed to provide vehicular access into the site from Radyr Court Close, which will involve the rearrangement of some of the existing parking spaces. The creation of the new access would result in the loss of two of the bays within the parking court used by existing residents. The existing verge is proposed to be adjusted to extend to provide 2no. compensatory spaces for existing residents as per fig.12 below.</p>

In addition to the two replacement bays within the existing parking courtyard, a total of 10 new car parking space will be provided to serve the development as shown on the site layout. This comprises of 1 space per dwelling together with 2 visitor spaces.

**Fig.12 Compensatory Parking Provision**



The width of the access and visibility splays will be designed as per Highway design specifications to ensure the safety standards for road users. The new car park will be a courtyard based on a perpendicular parking arrangement which will be designed to allow to enter and egress the site in a safe and forward manner.

Whilst the site is not located with the Central Parking Area for the purposes of Cardiff’s adopted SPG on Managing Transportation Impacts (Incorporating Parking Standards) (July 2018) it is highly sustainable in its location. Figure 7 below identifies the wide range of services and facilities within an approximately 1km walking distance from the application site.

**Fig.13 Services and facilities within an approximately 1km walking distance from the application site**

Name of service or facility	Distance (in metres)
Danescourt train station	303
Ysgol Pencae (Primary School)	350
Bus service (Routes 62, 63, 64, 122, 124)	450-550
Co-op Food store	550
Ysgol Gynradd	650
Danescourt Primary School (Primary School)	
The Heathcock (public house)	800
Ysgol Gyfun Gymraeg Glantaf (Secondary School)	850
Lidl food store	900

Danescourt Surgery	1000
Rookwood Hospital (Rehabilitation Centre)	1200

The availability of a range of services and facilities in a reasonable walking distance will discourage the use of private vehicles and therefore the modes of active travel in conjunction with public transport might highly likely be the preferred mean of transportation for the future residents on the site.

It is also noted that as a social-housing scheme, car ownership levels are evidentially significantly lower than for market housing and other housing tenures. Furthermore, the development will also incorporate 6 no. direct pedestrian accesses from the public highways to the site. One of these will be an accessible ramp that enhances the inclusive mobility of the future residents and visitors. This access links the site with the public footpath running along the northern-east boundary of the site.

It is considered that sufficient car parking has been provided in view of the scale and type of housing units. Pedestrian accesses have been incorporated through the residential scheme. In addition to the highly sustainable location of the site, it is believed that modes of active travel are promoted to the future occupiers and visitors through the design of the development. For these reasons, the proposal complies with relevant policies on active travel and highway safety including LDP Policies KP5, T1, T5 and T6.

#### Flood Risk and Drainage

In accordance with the Development Advice Map (DAM), the entire site falls within Zone C1 which means floodplain benefits from significant infrastructure including flood defences. New development in this flood zone can take place subject to application of justification test, including acceptability of consequences. The residential use of the development is categorised 'highly vulnerable' development within the vulnerability classification.

For these reasons, an exhaustive site-specific Flood Consequence Assessment (FCA) has been commissioned and produced by JBA to understand the scope of the flood risk and make the development safe against flood risk events by the implementation of appropriate flood mitigation measures.

Whilst it is acknowledged the Zone C1 flood probability on the site, the FCA incorporates the updated modelling of the Lower Taff which uses the most up to date data that provides further accuracy on the details of the fluvial flood risk in the area. One of the most remarkable updates is the calibration and verification of the model across a wide range of conditions, in particular data collected from Storm Dennis, February 2020.

The site remains flood free during a 1% Annual Exceedance Probability (AEP) event and the periphery of the site is impacted during a 0.1 %AEP event. The majority of the site therefore remains flood free during a 0.1% AEP event. Should flooding encroach on the site, the extent would be confined to the communal and amenity areas. Site-specific modelling indicates a maximum flood level of 18.98m AOD. Accordingly, the proposed finished floor levels of the houses will be set at 19.55m AOD.

Due to limitations of the Lower Taff model, modelled water levels were mapped onto the detailed site-specific topographical survey plans. Results indicated similar extents to the Lower Taff model, further supporting that the majority of the site should be classified as Zone A.

Floodplain storage calculations have been made and demonstrate a modest net gain in floodplain storage due to the land lowering on the playing area to the south of the houses. Therefore, the development does not increase the flood risk elsewhere but mitigates the predicted flood risk.

	<p>In view of the modelling outcome, the site should be re-classified to Zone A instead of Zone C1. However, a conservative approach has been taken to review flood risk in the area and both the justification test and the acceptability of consequences have been applied. The result is that the development is in an acceptable location, meets the wider sustainability objectives and all flood risk scenarios have been considered.</p> <p>Thus, the FCA has demonstrated that all aspects of the acceptability criteria set out in TAN15 have been satisfied. Consequently, the proposed development broadly meets the requirement set out in TAN15 and LDP Policies KP5, KP15, EN10, EN11 and EN14.</p>
Ecology	<p>A Preliminary Ecological Appraisal has been produced by Sylvan Ecology to identify any potential ecological constraints to development within the site; identify requirements for any additional ecological surveys needed to determine potential ecological impacts; and describe measures to mitigate or compensate for any impacts on the ecological interest of the site.</p> <p>Birds, bats, invertebrates and hedgehogs are the most significant species on the site and its setting. Mitigation measures range from less-intrusive works to the breeding bird habitat, bat-sensitive lighting, add invert coils for the soft landscaping, and building features to allow free passage of hedgehogs across the site.</p> <p>In summary, the most significant species, habitats and ecology networks have been appropriately identified. The development would have a limited impact on ecological features and, furthermore, compensation measures have been designed and will be implemented to ensure that there is no reduction in the overall nature conservation value of the area. It is therefore considered that the proposed development is compliant LDP Policies EN6 and EN7.</p>
Green Infrastructure	<p>The retention of the existing trees, the production of a landscaping strategy to mitigate and enhance natural environment and amenity quality, and sustainable solutions for surface water management have led the successive iterations of the design of the development. The Landscape Proposals (by Landarb Solutions) and the Engineering Layout (by Quad Consult) are appended with this document and provide further details on the green infrastructure.</p> <p>Green areas within the site range from landscape embankments to the front of the dwellinghouses, rain gardens and a swale, along with additional trees, hedgerows and shrubs.</p> <p>A significant amount of Open Space is provided on site, as well as provision of Informal Natural Play Space, which integrates into the proposed landscaping seamlessly.</p> <p>The proposals will represent an improvement of the current conditions of the land. The tarmac footpaths crossing the northern section of the parcel will be removed and replaced for further landscaping. In addition to the retention of the 2 no. existing trees, new trees will be planted on the parcel boundary.</p> <p>The green spaces, type of planting and SUDS features have been designed taking into account the significance of species and habitats of the site and surroundings including the River Taff, and the predicted flood risk in the area. It is therefore considered that the proposals comply with LDP Policy KP5, EN6, EN7, EN8 and EN10.</p>
Conclusion	

The proposed development will provide 8 much-needed new affordable houses in a highly sustainable location within Cardiff. This document provides an analysis of the proposed development's compliance with planning policy with the following findings:

- With regard to the principle of development, it is concluded that the delivery of a good quantum of satisfactory, usable and high-quality on-site provision would provide an overall betterment in respect of quantum and quality of Recreational Open Space provision within the ward and help meet an acute shortfall of Informal Play Space within the immediate area and wider ward.
- There would be no adverse impact on the natural heritage, character or any other key features of the river corridor with the conclusion that the development would comply with the requirements of both LDP Policies C4 and EN4.
- The 8 new affordable homes which would be delivered as a result of the proposed development would make a significant contribution to addressing the acute shortfall in affordable housing delivery within Cardiff as a whole and, specifically, the ward of Llandaff. The development would therefore fully comply with LDP policies KP13 and H3 and the delivery of 8 affordable housing units in the face of acute shortfalls and under-delivery should be afforded significant weight.
- With regard to design and amenity, the proposed development accords with the multiple policies on placemaking and design contained in PPW and Adopted LDP.
- Parking provision would be accordance with the Council's adopted standards, including compensatory provision for the loss of two existing spaces required to deliver access to the development.
- With regard to flood risk, the development would not only be in compliance with TAN15 and relevant LDP policies, but would provide a betterment for existing residents who have previously experienced incidents of flooding through the reprofiling of the southern parcel of land.
- The development would also provide a betterment to the designated River Corridor, due to the open space improvements being provided on site.
- There would be no adverse impact upon ecological or arboricultural features as a result of the development, and landscaping proposals would comply with Green Infrastructure policy requirements.

It is therefore concluded that the proposed development would comply with policies in respect of the protection of open space in isolation, and that the benefit that the proposed development would deliver in respect of meeting an acute Informal Play Space need in the locality and wider ward, mitigation of existing flood risk and, in particular, meeting local affordable housing need should be afforded significant Weight in support of the proposals.