

Sustainability and Parking Statement

122 -126 Dunraven Street, Tonypandy

July 2021

amity

planning consultants



Introduction	
Client	This statement has been prepared on behalf of RHA Wales.
Scope	This statement accompanies a full planning application for the <i>“Proposed affordable housing development, comprising of 11no 1 bed apartments and 2no 2bed fully adapted apartments together with car parking, landscaping and ancillary works.”</i> at 122 - 126 Dunraven Street, Tonypanyd.
Site Details	
Site Address	122 - 126 Dunraven Street, Tonypanyd. CF40 1QB.
Site Location	<p><i>Fig.1 Application Site</i></p> 
Relevant Planning Policy	
Planning Policy Wales	<p>Planning Policy Wales (PPW) Edition 11 (February 2021) is the overarching planning policy document for Wales. It sets out the land-use policy context for the consideration and evaluation of all types of development.</p> <p>PPW states:</p> <p><i>“The planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport. By influencing the location, scale, density, mix of uses and design of new development, the planning system can</i></p>

	<p><i>improve choice in transport and secure accessibility in a way which supports sustainable development, increases physical activity, improves health and helps to tackle the causes of climate change and airborne pollution by:</i></p> <ul style="list-style-type: none"> • <i>Enabling More Sustainable Travel Choices – measures to increase walking, cycling and public transport, reduce dependency on the car for daily travel;</i> • <i>Network Management – measures to make best use of the available capacity, supported by targeted new infrastructure; and</i> • <i>Demand Management – the application of strategies and policies to reduce travel demand, specifically that of single-occupancy private vehicles.”</i> <p>PPW goes on to states:</p> <p><i>“The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:</i></p> <ul style="list-style-type: none"> • <i>are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;</i> • <i>are designed in a way which integrates them with existing land uses and neighbourhoods; and</i> • <i>make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.”</i>
<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.</p> <p>TAN 18: Transport recognises that the location of new residential development has a significant influence on travel patterns and requires appropriate levels of access by walking, cycling and public transport for new residents and the wider community to local services.</p> <p>With regard to parking standards, paragraph 4.6 of TAN 18 states:</p> <p><i>“Maximum car parking standards should be used at regional and local level as a form of demand management... Therefore evidence based on the likely effects of different parking levels for each land use should be considered, including consideration of the relative locations of land uses and their consequent accessibility.”</i></p>
<p>Development Plan</p>	<p>In accord 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>The Development Plan for the area comprises:</p> <ul style="list-style-type: none"> • Rhondda Cynon Taf Local Development Plan 2006 – 2021 (adopted March 2011) <p>Policy AW5 of the adopted LDP advises that development proposals will be supported where, amongst other criteria, car parking would be provided in accordance with the Council’s Supplementary Planning Guidance on Delivering Design and Placemaking: Access, Circulation and Parking Requirements.</p>
<p>Supplementary Planning Guidance</p>	<p>The Council’s Supplementary Planning Guidance on Access, Circulation & Parking Requirements (adopted March 2011) provides further guidance on parking standards within the authority. This identifies the application site as lying within <i>Zone 2 – Urban</i> which, it advises, contains <i>“a range of basic local facilities generally within 400m walking distance”</i> and has <i>“regular and frequent bus services to a range of destinations offering practical access to most but not all essential facilities.”</i></p>

In accordance with TAN 18, parking standards within the SPG are confirmed as maximum parking standards. Maximum residential parking standards for Zone 2 are identified on table a2 overleaf.

Table a2 : Residential: New Build and Conversions – Zones 2, 3 & 4		
Type of Development	Maximum Requirement	
	Residents	Visitors
General Purpose Houses and Apartments		
Houses (1 or 2 Bedrooms)	Maximum 2 spaces	Maximum 1 space per 5 units for all general purpose developments
Houses (3 or more Bedrooms)	Maximum 3 spaces	
Apartments (1 or 2 Bedrooms)	Maximum 2 spaces	
Apartments (3 or more Bedrooms)	Maximum 3 spaces	
House conversions to bedsits, or self-contained apartments	1 space per bedroom (maximum requirement 3 spaces)	
House conversions to residential hostel	1 space per resident staff 1 space per 3 non-resident staff	

The supporting text to the table states:

“For developments where clear evidence has been supplied that car ownership levels will be lower than normal, a more flexible approach to numbers of parking spaces may be taken.”

Case Law

A number of appeal decisions within the RCT authority area have established the principle that affordable housing schemes require less parking provision than market housing schemes. This principle was established on the back of submitted evidence, including a UK Government study and RCT’s own Housing Needs Assessment Report.

One such appeal decision (York Drive, Llantwit Fardre) is enclosed at Appendix 1. With regard to parking demand the Planning Inspector concluded:

The appellant’s evidence includes a UK Government study carried out in 2007 and the Rhondda Cynon Taf Housing Needs Assessment Report 2006 which clearly identifies that the car ownership level in social rented housing schemes is lower than that of private housing. I have had regard to the advice in Planning Policy Wales that new developments should provide lower levels of parking than have generally been achieved in the past.

Providing for Journeys on Foot

In the absence of adopted national or local policy or guidance defining acceptable walking distances, ‘Providing for Journeys on Foot’ published by the Chartered Institute of Highways and Transportation in 2000 provides the closest thing to nationally recognised guidance. Table 3.2 of the document identifies the following preferred maximum walking distances:

	Town Centres (m)	Commuting/School	Elsewhere
Desirable	200	500	400
Acceptable	400	1000	800
Preferred Maximum	800	2000	1200

Sustainability Assessment

A sustainability assessment has been undertaken in support of this application which identifies the following walking distances to key services and facilities:

Facility	Walking distance from proposed scheme
Major Employment (Tonypany designated Town Centre)	Located within
Comparison Retail (Tonypany designated Town Centre)	Located within
Bank (Santander, Dunraven Street)	24m
Public Car Park (Eleanor Street)	53m
Pharmacy (Boots, Dunraven Street)	58m
Bus Stops (War Memorial, Dunraven Street)	81m
Post Office (Tonypany Convenience Store and Post Office, Dunraven Street)	112m
Supermarket (Iceland, Dunraven Street)	152m
Equipped Play (Ste George's Park)	350m
Primary School (St Gabriel and Raphael, Primrose Street)	352m
Train Station (Tonypany)	535m

The sustainability assessment confirms that almost all of the key services and facilities lie within a desirable walking distance of the application site, and the train station lies within an acceptable walking distance of the site (based upon the CIHT publication 'Providing for Journeys on Foot'). The site is therefore highly sustainable and there is every reason to believe that residents could comfortably reside at the property without reliance upon access to a private car.

Analysis

Existing Dwelling

The existing building contained an A2 (financial services) use with a footprint of circa 150sq.m (which, it is assumed, extended across several floors), and 3 or 4 A1 (retail) uses with a combined footprint of circa 375sq.m (with, it is assumed, ancillary storage/office space above). Post Office records also identify the presence of 7 flats (C3 use) registered at 125-126 Dunraven Street. The uses would have generated parking requirements as follows:

- A2 (Financial Services): 1 space per 25sq.m
- A1 (Retail): 1 space 60sq.m

	<ul style="list-style-type: none"> - C3 (Residential): 2 spaces for 1 and 2 bed flats, 3 spaces for 3+ bed flats, and 1 space per 5 units for visitors. <p>Whilst the ancillary floorspace of the commercial units and number of bedrooms of the flats is unknown, as a minimum the car parking requirements would have required:</p> <ul style="list-style-type: none"> - A2 (Financial Services): 6 spaces - A1 (Retail): 7 spaces - C3 (Residential): 16 spaces <p>This gives rise to a total of 29 spaces. No existing off-street parking is provided.</p>
Proposed Development	<p>The development proposes 11no. 1 bedroom, and 2no. 2 bedroom, affordable apartments which would be served by 4no. car parking spaces. The proposed units would be affordable in nature and restricted in occupation accordingly. It has previously been evidenced that affordable homes generate less than 50% of the demand for parking than market housing regardless of site sustainability, evidence which has been accepted by Inspectors within RCT authority area on a number of occasions. A 50% demand against the maximum car parking standards for the proposed development would give rise to the need for 15 car parking spaces. The on-site provision therefore represents a shortfall against standards of 11 car parking spaces, however a significant betterment when assessment against the previous use of the site.</p> <p>In this instance it has been further evidenced that the site is highly sustainable, with all key services and facilities within easy walking distance.</p> <p>Having regard to the above considerations, it is clear that the proposed parking provision would be appropriate for the development, and that the scheme would represent a betterment in parking terms when compared with the previous use of the site.</p>
Conclusions	<p>It has been evidenced that 4no. car parking spaces represents an appropriate provision for the proposed development, accounting for the affordable nature of the scheme and the site's sustainability credentials. On top of this, it has been shown that the previous use of the site provides a significant shortfall in parking provision, and so a reduced parking provision would represent a betterment over the existing position. Accounting for these matters it is concluded that the level of car parking proposed accords with the principles of both Planning Policy Wales and TAN18: Transport in respect of promoting sustainable development, and that clear evidence has been provided for a more flexible approach to parking in accord with RCT's adopted SPG on Access, Circulation & Parking Requirements (adopted March 2011). For these reasons, the development should be supported.</p>