

*Objection by Residents of Ty-Draw Road*

*Application Ref: 19/02648/MJR*

*Land north of Ty-Draw Road, Cardiff*

*Proposed development of 45 affordable housing units with associated highways and drainage infrastructure.*

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### *Introduction*

1. My clients comprise a group of established Ty-Draw Road residents<sup>1</sup> living close to the application site on both sides of the road between the site and Ty-Draw Road's junction with St Mellons Road. They have previously submitted objections to previous forms of this proposed development in November 2019 and January 2020 respectively, and these remain valid. The latest, revised version of the scheme does not overcome their previous concerns.

### *Strategic Planning Issues*

2. The site forms part of the larger LDP designation for a strategic development site for a comprehensive development of approximately 4,500 homes, employment and other associated community uses in North-East Cardiff (Policy K2(F)). The explanatory text to LDP policy K2 provides that:

*The masterplanning and good quality & sustainable design principles set out in KP4 and KP5 will be used to provide a framework to consider planning applications relating to all Strategic Sites along with other development as defined in the policies. In addition, the site-specific masterplanning requirements for each Strategic Site are identified within KP2(A) to KP2(H) and depicted, where appropriate, on the indicative Schematic Frameworks. Although only for illustrative purposes, the Schematic Frameworks should be read in conjunction with relevant policies to provide an overarching context for the future development of the Strategic Sites.*

3. The application departs from the policy requirements of the LDP, and is therefore at odds with its provisions. The site is promoted in isolation without reference to any masterplan. The site, together with a significant adjacent tract, falls outside the boundaries of the draft masterplan recently promoted by Taylor Wimpey (TW), and that promoted by Redrow further south.
  4. Moreover the applicant's claim in the accompanying Planning Statement that the site is allocated in the LDP for residential development is misleading. This claim is promulgated on the basis that the site is shown on the Schematic Framework within the body of policy K2(F) as residential development. However, the explanatory text to the policy clarifies that the Schematic Framework Diagrams are '*only for illustrative purposes*'.
  5. The Council is therefore required to decide whether in the light of the objectives and requirements of its strategic policy K2 and the requirements of policy K4 whether it is appropriate that this site, promoted in isolation as what can best be described as piecemeal
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development, should be released for residential development at this stage, in the absence of adequate masterplanning.

6. The objectors consider that the proposal represents the antithesis of good and proper planning or sustainable placemaking, the objectives of which are set out clearly in the relevant policies of the LDP and in the most recent version of Planning Policy Wales (Ed 11).
7. In the absence of a masterplan for this site and adjacent land, the application is clearly premature having regard to the provisions of the LDP. Any masterplan prepared for the development of this and adjacent land should also have proper regard to the provisions of the other masterplans affecting the wider area, if and when approved.
8. Thus the proposal is in clear conflict with those objectives of LDP policies KP2, KP4 & KP5 and those of PPW with regard to the attainment of good quality and sustainable design principles within a masterplan context.

### ***Good Quality and Sustainable Design and Placemaking***

9. The introductory wording to LDP policy K5 provides that:

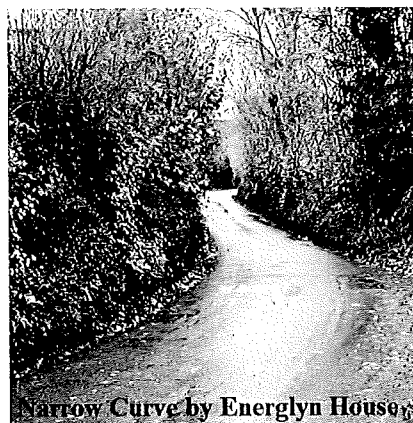
*'To help support the development of Cardiff as a world-class European Capital City, all new development will be required to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces ...'*

10. This policy, although preceding the publication of PPW editions 10 & 11, nevertheless reflects the thrust of national policy guidance on sustainable placemaking, which is required to be at the heart of the planning process in Wales.
11. The policy sets out a series of specific criteria, in order that new development complies with the general requirements and objectives of the policy.
12. Save for introducing a link to an a nearby housing development by demolishing a modern dwelling, the revised layout has been subject to some cosmetic tinkering, none of which is conducive to achieving an outcome reflecting the most recent expression of national policy issued in February 2021.
13. The proposal's design fails the requirements of LDP policy K5 criterion (i) in that it does not respond appropriately to local character and the context of the built and landscape setting in terms of layout and density. In this regard most of the land on the site's boundary is undeveloped and comprised of green fields. In the absence of a masterplan no information is available as to the form of development, if any, likely to take place on this large tract bordering the site.
14. The development to the north along Ty-Draw Road is comprised of low density housing, of detached dwellings. The high-density housing proposed, and its mundane layout, takes no account of the form and layout of extant local development or of the form or the proposed layout of any future development on adjacent land.
15. The development, given its relatively isolated location would not lead to the creation or contribute to the achievement of a balanced community. Moreover, in the absence of a masterplan the proposal could not create or lead to the creation of interconnected streets, squares and spaces as required by LDP policy K5.

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16. In reality this would be a development '*plonked*' unceremoniously in relative isolation in the urban fringe, with no real regard to spatial inter-connectivity as required under the terms of criteria (ii), (iii) & 4(iv) of the policy.
  17. Whilst the layout purports to show a future possible highway link, in reality this is meaningless since clearly it is a link to nowhere or nothing. It merely serves to indicate that local landowners/developers in this part of the larger designation do not appear to be working together for masterplanning purposes.
  18. The site's relative isolation will not assist in meeting the objective of criterion (v). The walking/cycling distances/times to facilities provided in the applicant's accompanying revised Transport Plan only serve to underline the site's relative remoteness from services, facilities and access to public transport.
  19. The applicant's suggestion that walking will be encouraged is a false proposition, given the nature of the unlit, unattractive and dangerous links on the existing road network to even the closest existing and proposed services. The alternative proposed in the revised application does not render the site closer to any community facilities or services.
  20. The newly proposed link, and the unnecessary demolition of a modern dwelling, is a crude device seemingly encouraged by the Council's highway engineers, to reduce cycle and pedestrian traffic on Ty Draw Road. Other means are available to reduce conflict on this road, but have not been appropriately examined by the Council.
  21. The isolated location of the site will thus itself serve as a discouragement to any future residents to engage in walking, and access to facilities/services. This should be of particular concern given that a proportion of future residents may well not have access to a car.
  22. On the other hand, the extent and provision of car parking spaces in the revised layout indicates an anticipation on the part of the applicants and Council officers that car ownership will be common. That is not surprising, since because of the site's isolated location, future residents are likely to be almost wholly reliant on the car as a means of accessing community facilities and services. This, again, swims against the tide of national policy.
  23. The proposal, accordingly, conflicts with many of the determining criteria of LDP policy K5 and the principles/objectives of place-making set out in the latest edition of PPW.

### *Access*

24. I have touched on access in the previous sections, but the applicants originally intended to promote a road closure along Ty-Draw Road. My clients were not necessarily opposed to this, in principle, or to the introduction of other regulatory means of regulating traffic, if the Council were intent to approve the housing scheme.
25. However it is apparent from the submitted documentation that the Council Highway officers are opposed to any such concept. Indeed they are seemingly intent on allowing a substantial increase in the amount of traffic using this length of Ty Draw Road, which, as the following photographs illustrate, is no more than a narrow country lane.



26. The increase in traffic would arise not only from the current proposal, but also from the larger development proposal promoted by TW, which is currently awaiting determination<sup>2</sup>.
27. TW, as part of their outline proposals, intend to ‘improve’ the lower part of Ty-Draw Road and to introduce a new access point into their development area. A junction improvement is also planned at a point where Ty-Draw Road and St Mellons Road meet. There is no clear indication in the TW proposals envisaging the closure of Ty-Draw Road, indeed the evidence points the other way.
28. Information provided at tables 5-4, 5-5 & 5-13 of TW’s revised Transport Statement provides that the current (2017) Annual Average Daily Traffic (AADT) on Ty Draw Road is 2111.
29. When the TW development is complete this would have increased to 4497 AADT – a percentage increase of 113%, or more than a doubling of traffic on a narrow rural lane incapable of safely accommodating the traffic already using it, particularly cyclists and pedestrians.
30. My clients have asked previously for modelling work to be undertaken to discover the effects on the wider highway network of introducing an access-only regime or a partial closure on this length of Ty Draw Road. In such a scenario, only current frontagers would access the road by car, but significant benefits would arise for the wider community in that the rural lane could be increasingly and more safely be used by pedestrians and cyclists alike.
31. The Council’s highway engineers seem oblivious to such a request, and for this reason planners and councillors are requested to insist on such modelling taking place. In the meantime, the amended application has drawn opposition in increasing numbers, for understandable reasons.
32. The access arrangements, coupled with the implications of the highway effects of the TW proposals on Ty Draw Road, are dangerous and unsatisfactory. In this regard, the authors of the applicants revised Transport Statement appear oblivious to the impact of the TW proposals on Ty Draw Road, and have not taken it into account in their assessment.

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<sup>2</sup> Application Ref 19/02330/MJR – my clients’ objection to this has already been submitted

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*Summary*

33. For the reasons stated above, the proposal is regarded as premature, harmful to local character, and isolated with regard to issues of sustainability. The access arrangements are also unsatisfactory. The development thus conflicts with the objectives and provisions of LDP policies K2, K4 and K5, and with national government's policy advice on sustainable placemaking. The proposal does not therefore accord with national policy or the development plan and accordingly, the application should be rejected.



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