

**LLANDAFF SOCIETY OBJECTION RE PLANNING APPLICATION NO: 15/00799/MJR
PROPOSALS FOR HOUSING ON THE BBC SITES, LLANTRISANT ROAD**

1. The Llandaff Society view is that any development of these sites must enhance, rather than detract from, the quality of the landscape, townscape and community facilities in Llandaff. We **OBJECT** to the current application on the basis that does not do so.

2. There is a substantial strength of feeling against the current application because of:

- unacceptable traffic, air quality and environmental impacts all of which will be more than estimated;
- added traffic volume and further extension of the existing 2 hour peak periods;
- no solution for the existing overloaded junction between Llantrisant Road, Bridge Road and Cardiff Road which has very awkward geometry and is a road safety hazard for pedestrians because of the narrow pavements and lack of safe crossing points;
- demands of the new residents on over-stretched transport, schools, health, education and community facilities;
- lack of any community facilities or local employment opportunities on site apart from demolition and construction jobs;
- insensitive design and massing of apartment blocks on (i) the south-eastern and (ii) south-western edges of the site which would adversely affect (i) the setting of the listed Rookwood House and listed Summerhouse, and (ii) be overbearing in relation to the 2 and 3 storey Victorian and Edwardian houses on Bridge Road;
- the alignment of houses along the bank above Bridge Road will result in awkwardly-shaped gardens, unattractive fencing and a missed opportunity for secure design with passive overlooking of the adjacent footpath;
- insufficient certainty of delivery **on site** of 20% affordable housing, and no indication of best practice (ie low cost, high eco standard, design neutral homes scattered across the 2 parts of the site) ;
- insufficient open space and landscaped areas - most of which are internal to the site and thus unlikely to be used by the wider community;
- insufficient provision of sustainable surface water drainage; and
- no mention of any S106 Planning Gain or S278 Highways Act contributions.

3. In addition, despite claims on the Taylor Wimpey (TW) web site that they “build more than just homes” and “create jobs and provide affordable homes as well as roads, community centres, schools, doctors’ surgeries, and other facilities..” their site at Radyr

Sidings is a monoculture of housing. There is no indication that development on the BBC sites will be any different, there being no employment, education, health or community uses proposed meaning that all residents have to leave the sites to access the - already overloaded - local facilities.

4. Llandaff Society is concerned that this outline application seeks to minimise the impact of this major increase in housing on a site adjoining the Llandaff Conservation Area which is very much an integral part of the City and does not in any sense form the “edge” of Llandaff.

5. We and local residents are convinced that - contrary to the developers’ claims - it will **add to** rather than decrease congestion on Llantrisant Road and the nearby junction on an unsafe, sub-standard alignment of two radial routes into the City. The assumptions on car ownership and usage are based on national averages and vastly understate the likely figures because most of these will be high value properties attracting relatively affluent occupiers with 2+ car ownership per household and high car usage. The estimates do not appear to take into account the large number of delivery vehicles likely to access these areas, which should be added to domestic trip generation to get figures very close to existing ones. We also contend that the flows will be more heavily peaked than the developers’ consultants assume. Cars entering and exiting the sites will disrupt traffic flows on Llantrisant Road to a far higher level than assumed given that they will all have to use that road - rather than be divided at peak hours as now - because of the use of the main site access from Bridge Road .

6. This volume of traffic will impact on pollution and air quality, a particular concern because of the proximity of the Llandaff Air Quality Management Area and the known adverse health impacts of high levels of nitrous oxide (NO₂) and particulates (PM₁₀ and PM_{2.5}) which already exist in Llandaff.

7. We are also concerned that at reserved matters stages there will be an increase in the number of units, and that this application does not provide sufficient information for proper assessment of the environmental impact of the proposed number of units, leave alone a larger development.

8. The transport statement does not include any assessment of cumulative impact of this development in addition to major Local Development Plan (LDP) allocations of 11,500 houses in North West Cardiff, applications for which have already been submitted to the Council. Llandaff Society made strong objections to the lack of transport and other infrastructure to support the scale of development proposed at the recent LDP Examination hearings. We await further public consultation on “Matters Arising Changes” and the Inspectors’ decision on whether the LDP is sustainable. In advance of that decision, this major application is premature. It does not deal appropriately with existing - let alone future - transport problems. In particular it does not include provision for the logical solution to the problematic road junction - a link between Llantrisant Road and Bridge Road

that would allow safe passage of buses and other large vehicles, the Bridge Road/Cardiff Road junction to be closed, and improved facilities for pedestrians.

9. Llandaff Society contends that the application should be **REFUSED** on all the above grounds.

10. If a decision is made to approve the application, it must be subject to strictly enforced conditions to mitigate impacts both directly and indirectly during demolition, construction and occupation. In particular there need to be far stricter limits than the developer suggests on working hours, noise and pollution control (air, soil and water-borne), vehicle movements and routes to and from the site, and more detail provided on safe and effective treatment of asbestos and other hazardous substances and disposal of waste arisings. We suggest that an enforcement mediation procedure involving local residents should be agreed in advance to deal on a day by day basis with any nuisance or enforcement issues arising during demolition and construction phases.

11. Any approval should also be subject to a S106 agreement to mitigate the effects of the development, including on-site:

- provision of a new road link between Llantrisant Road; and
- 20% on-site affordable housing with protected tenure.

12. Off-site provision covered by the S106 should include:

- substantial contributions to new local rail and bus services, and to eco-friendly bus purchase;
- improvement of (a) the existing footpath alongside the Rowing Club and the River to the Cathedral, (b) the footpath linking Fairwater Road to Llantrisant Road, and (c) 2 new footpaths from Tŷ Oldfield to Fairwater Road to give access both to future development at Rookwood and to the park and community hub at Insole Court; and
- contributions to health and community facilities eg Insole Court and a new primary health care facility for the area, and the historic environment of the adjacent Llandaff Conservation Area, specifically to repair and restoration of the Bishop's Palace.

13. The S106 agreement should be based on an open-book assessment of costs and be subject to external validation.

14. We urge the Council to secure local references - site, building and street names - to the 50 year tenure of BBC Wales and to Tŷ Oldfield, as well as to other locally significant names.

15. Should this outline application be approved, Llandaff Society requests continued involvement at reserved matters stages and any significant changes are proposed thereafter.

KSP/20 May 2015