

## LLANDAFF SOCIETY COMMENTS ON:

### TAI WALES AND WEST HOUSING (TWWH) PRE-APPLICATION CONSULTATION 14 AFFORDABLE HOUSES ON LAND AT RADYR COURT CLOSE

1. Llandaff Society is a civic society established in 1977 which has over 250 members. We comment on planning applications and issues within our “area of interest”, which includes Riversdale and this land. Our comments on your consultation documents are as follows:

2. Whilst we acknowledge the need for more social rented housing in Cardiff, Llandaff Society Committee is clear that this is not an appropriate site for housing, or any other development, for the following reasons:

(i) **the site is in the flood plain of the River Taff.** It is located between Radyr Court Road and Radyr Court Close, both of which, as well as homes on Radyr Court Close, have been flooded - most recently in February 2020. With increasing periods of heavy rain and fluvial flooding this area is bound to be under water again, the only question is when. If new homes are built on this site there is no doubt that they **will be flooded**. Welsh Government updated Flood Risk TAN 15 will come into effect in June 2023. In the interim, the current TAN 15 requires a Flood Risk Assessment (FRA) for high risk areas, so we were surprised by the lack of a detailed technical assessment of the level of risk, and the potentially devastating consequences, of flooding.

(ii) **development of this site would rob residents of the existing TWWH properties on Radyr Court Close of their amenity space.** The loss of the amenity space that would occur if this scheme receives planning permission is referred to on page 10 of the Design and Access Statement (DAS). It is not acceptable for residents to lose use of the only amenity land close to their homes. Many other amenity spaces have been lost for development of various kinds in the past, and the Society is determined to resist any further erosion of our precious green spaces. We dispute the claim that what is offered as compensation for loss of this area would represent “adequate compensatory provision”. We suspect that the financial contribution to the Council would not be used to create more open space but to maintain what exists now. Whilst play equipment for young children on the southern piece of amenity space would be welcome, it would further reduce the amount available for adults.

(iii) **loss of this amenity space for nearby residents with limited or no private gardens is totally unacceptable in the context of TWWH and the Council’s duty to protect and enhance the wellbeing of future generations.** The basis for this objection should be clear from the terms of Welsh Government’s Wellbeing of Future Generations Act 2014. The loss of an amenity area across a road from their homes could lead to negative health impact and/or increased social isolation for TWWH residents. This is even though the amenity land is very basic, comprising two grassed areas and a total of four trees. Leaving the smaller of

these two patches of grass as an amenity area for existing residents and those from fourteen additional homes would be totally unacceptable.

**(iv) insufficient attention has been given to overall design quality and place-making.** It appears that the layout has been worked out to squeeze the maximum number of units onto the site without recognising that building here would take away the sense of place and of space that this 'green gateway' gives to residents in all the surrounding development. Welsh Government Planning Policy Wales (PPW) stresses the importance of place making - indeed this is the focus of the whole of Section 2 of PPW Edition 11. Two of the four elements highlighted in the diagram on page 20 are "Active and Social Spaces", and "Distinctive and Natural Places", both of which apply to this site, development of which would not be compatible with national policy. The approach to Radyr Court Close is currently framed by trees and green space which gives the area a distinctive and uncrowded feel. The site itself is amenity land for the exclusive use of TWWH residents, but it also contributes to a feeling that the wider Riversdale area is a good place to live.

**(v) the design does not appear to have taken into account the current building line on Radyr Court Road, introduces direct access for those facing it that do not have forecourts, and does not appear to cater for bicycle storage.** The design is high density and cramped, quite unlike the open layout of the existing social rented homes in the area and appears to offer insufficient room for parking vehicles, bicycles and motor bikes. If it goes ahead it would thus be likely to lead to a worse environment including overspill parking on-street.

**(vi) development here would remove yet more open space from the Taff River Corridor, which Local Development Plan (LDP) Policies 16(iii) and EN4 are supposed to protect.** LDP policy makes it clear that the river corridor is a precious resource. If this part of it is used for development it would diminish the value of the whole. Protection of these green river corridors for wildlife and recreation is supported by local communities and has been enshrined in policy since the first Cardiff Local Plan. It is not appropriate, nor in line with local planning policy, for sites within the River Corridor to be considered for development.

**(vii) the site is an important area for absorbing excess rainfall, its development would lead to more run-off.** Run-off would be bound to increase from the extensive hard surfaces proposed - including the roofs, paving and parking area - which couldn't be drained when the River is in flood, so increasing flood risk in the wider area.

**(viii) the proposals would reduce, rather than enhance, biodiversity on the site.** The Welsh Government policy imperative set out in PPW Edition 11 is for biodiversity **enhancement** on all new proposals for development. There are currently 3 semi-mature trees on the site identified for the new housing. It is proposed to maintain these, but there is precious little room left for any additional planting. Hence the overall position should this proposal go ahead would be a **loss** of biodiversity.

3. The documents prepared for pre-application consultation do not give an accurate context, or any idea of the scale of negative impacts that this development would have on current residents of Riversdale and their well-being. They certainly do not provide a convincing case for any development to go ahead on this site. No amount of further work would persuade Llandaff Society that the proposal for housing on this site is acceptable in terms of national and local planning policy or community wellbeing. Nor do we consider that changes (eg a reduction in the number of units) would make this proposal acceptable.

**4. In view of all the above we urge Tai Wales and West Housing to drop its proposals to develop this wholly inappropriate site and concentrate on managing its existing stock effectively.**

**Llandaff Society : 6 September 2022**