

○ ○ ○ ● Infill Sites
Supplementary
Planning
Guidance



Approved by Council April 2011



Contents

1.0 Introduction	4
2.0 Definitions and Design Approach for Infill	6
Gap site development within a street frontage	6
Backland development	9
Site redevelopment	11
3.0 Objectives of Good, Sustainable Design	13
Sustainable buildings	13
Quality of living	13
Inclusive design	14
Character and context	14
Building plot and building line	18
Height, scale and massing	21
Density	22
Open space, trees and landscaping	23
Boundary treatment	24
Designing out crime	25
Vehicular access and parking	25
4.0 Residential Amenity and Privacy	27
Gardens and amenity space	27
Privacy, overlooking and overshadowing	28
5.0 Conservation Areas and Listed Buildings	30
6.0 Refuse disposal	31
7.0 Appendices	32
Appendix A: Policy context	32
Appendix B: Contacts	34
Appendix C: Consultation Representations and Responses	36

1.1 This Supplementary Planning Guidance (SPG) provides design guidance on what is broadly termed as ‘infill’ development. This type of development commonly consists of three main types:

- Gap site development within a street frontage;
- Backland development; and
- Site redevelopment (where the replacement of an existing building is proposed).

1.2 In general terms this type of development is normally small-scale (25 units or less), but there may be exceptions to this rule where this Guidance will apply.

1.3 The overarching aims for this SPG are that infill development:

- Protects residential amenity, both of new and existing occupiers;
- Makes a positive contribution to the creation of distinctive communities, places and spaces;
- Is of good design which encompasses sustainability principles;
- Responds to the context and character of the area;
- Makes efficient use of brownfield land.

1.4 This SPG is written in the broader context of sustainable development outlined in the Welsh Assembly Government’s Planning Policy Wales (2010), TAN 12: Design (2009) and TAN 22: Planning for Sustainable Buildings (2010). The Welsh Assembly endorses Manual for Streets and Manual for Streets 2 principles which should be applied in infill development.

1.5 Current and future requirements for meeting the CFSH (Code for Sustainable Homes) and BREEAM standards are outlined in Planning Policy Wales (edition 4) which states the following, (reference should be made to the latest edition of PPW for full and up-to-date guidance):

Applications for 1 or more dwellings received on or after 1st September 2010 to meet Code for Sustainable Homes Level 3 and obtain 6 credits under issue Ene1 - Dwelling Emission Rate²⁷.

1.6 Planning Policy Wales indicates that development should seek to mitigate the consequences of climate change by building resistance into the natural and built environment. One element of sustainable development includes the efficient use of resources; the utilisation of previously developed land (brownfield) promotes the efficient use of land and helps to reduce demand on greenfield sites. The merits of this type of development, however, need to be balanced with a number of design considerations; inappropriate development that would damage the character and residential amenity of existing residential areas will be resisted.

1.7 It is advised that a pre-assessment sustainability report is included as part of the application to ensure that sustainability measures are considered at an early stage. The plans submitted with any planning application will need to show in detail how the sustainability credentials, relevant to planning permission, are being incorporated.

1.8 Legislation requires a Design and Access Statement (DAS) to accompany applications for all new dwellings. The DAS should include a full design appraisal of the site in its context. Following this, it should explain and justify how the contextual analysis has been used to influence the design response. It should be made clear how sustainability requirements have been taken into account as part of the design process. TAN 12 (Design) provides an outline of the broad content of a DAS for planning permission and listed building consent.

1.9 This guidance is primarily supplementary to Policy 11 (Design and Aesthetic Quality) of the Adopted City of Cardiff Local Plan, although other development plan policies may also be relevant.

1.10 The Welsh Assembly Government supports the use of Supplementary Planning Guidance (SPG) to set out detailed guidance on the way in which the development plan policies will be applied in particular circumstances or areas. SPG must be consistent with development plan policies and national planning policy guidance and may be taken into account as a material planning consideration in planning decisions.

1.11 This SPG should be read in conjunction with the Residential Design Guide (2008), which contains comprehensive design principles, as well as guidance for medium to large scale housing developments.

1.12 The Affordable Housing Delivery Statement (AHDS) 2010 currently states that the threshold for an affordable housing contribution is required on sites of 10 units or more.

1.13 Details of planning policy guidance are available on Cardiff Council's website (www.cardiff.gov.uk); but the policy documents highlighted below may be of particular relevance:

- Householder Design Guide (SPG, 2007)
- Affordable Housing (SPG, 2007)
- Affordable Housing Delivery Statement (Interim Planning Policy, 2010)
- Conservation Area Appraisals (Guidance)
- Access, Circulation & Parking Standards (2010)
- Trees and Development (2007)
- Tall Buildings Design Guide (2009)
- Open Space (2008)
- Biodiversity SPG (2011)

1.14 Further details regarding Legislation, Guidance and Development Plan Policies can be found in Appendix A.

2.1 Infill development commonly consists of three main types:

- Gap site development within a street frontage (p.6);
- Backland development (p.9);
- Site redevelopment (p.11).

2.2 All three types of development often result in a more intensive use of land; therefore, account needs to be taken of neighbouring land uses, potential increase in a particular use or activity, and vehicular and pedestrian generation. The context and adjacent townscape/landscape should influence the appropriate intensity of development.

2.3 All development must be of good design and make a positive contribution to the adjacent townscape/landscape; this should come about following a clear vision for the project identified after a detailed analysis of what is appropriate for the context. The design response may be expressed in a number of ways but should always make a positive contribution to the context of the area.

2.4 Infill development commonly takes place within a built-up environment, but in places which are more rural in context, the landscape setting must inform the location and boundary treatments of any development.

2.5 Additional measures may be requested to make a site acceptable for development. Examples of this might include landscaping or lighting. A financial contribution may be requested for improvements to the access route or to areas outside the immediate site.

2.6 The following section sets out the key characteristics relevant to the three types of infill development, and highlights specific points that need to be considered and included as part of the Design and Access Statement (DAS). This should be read in conjunction with the general objectives of good design set out in Section 3.

● ● ● ● Gap site development within a street frontage

2.7 Infill development that takes place within a gap in an existing built up frontage can have a significant effect on the appearance of an established street, so careful consideration must be given to how the scheme will relate to its surroundings and built context.

Gap site development within a street frontage



These infill developments successfully employ elements of contemporary design whilst also responding to character and context in terms of:

Scale and massing

Appropriate to neighbouring dwellings.

Building line

Maintains the existing building line in the street.

Materials

The predominant facing materials reflect the materials in the neighbouring dwellings, whilst the additional materials chosen for finer detailing complement the building and the street scene.

**Architectural detailing**

The design reinvents the various shapes and features in the adjacent buildings in a contemporary way, such as window design.

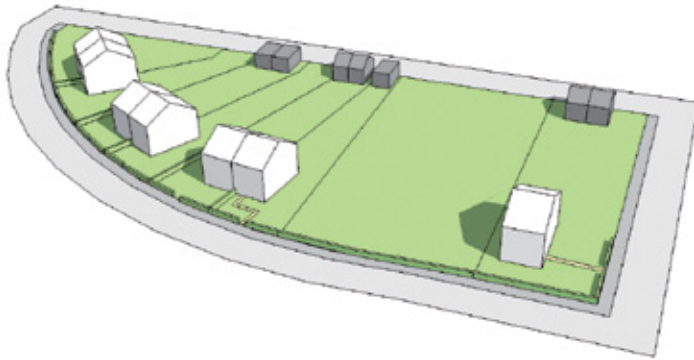
Boundary treatment

A dwarf wall which includes main entrances from the street maintains the character and activity on the street.

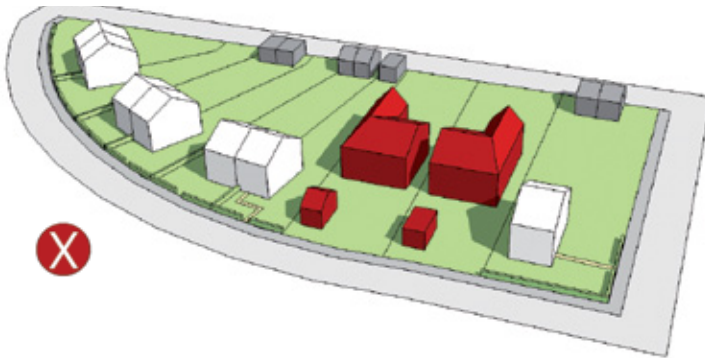
Parking

Parking is incorporated into the plot in a similar manner to the adjacent houses and does not dominate the street scene.

Poor examples of gap site development

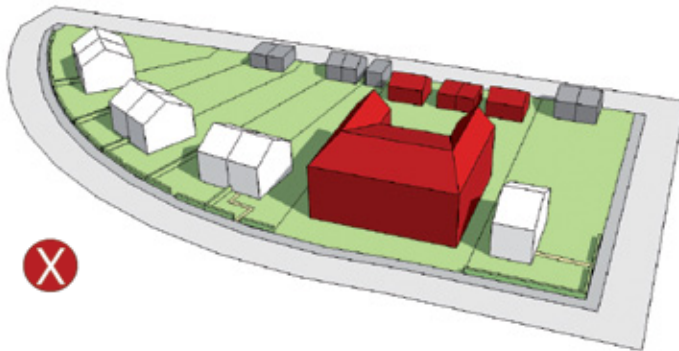


Gap site prior to development



These two examples fail to respond to the existing character of the surroundings which comprise of:

- A strong pattern of buildings;
- A clear building line;
- Consistent boundary treatment along the street frontage;
- Consistent house proportions;
- Parking garages to the rear.



●●●● Backland development

2.8 Backland development refers to the development of land that lies to the rear of an existing building line of properties fronting a highway. Such land may comprise of an area with some existing structures such as garages, a single rear garden or an accumulation of adjoining sections of rear gardens. The term normally applies within predominantly residential areas.

2.9 Any proposals within backland sites should reflect the characteristic scale of backland development within the local area. As a general rule, backland development should be a subservient form of development (lower than the front facing properties). The Cardiff Residential Design Guide SPG provides an example of the Victorian and Edwardian urban areas, where backland sites have traditionally been developed at a lower, secondary scale to the surrounding streets within a clearly identified street hierarchy. Replacement or new developments within similar sites should reflect this traditional pattern of development.

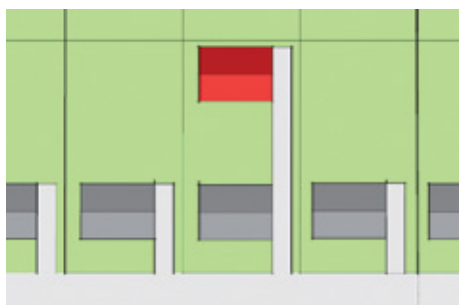
2.10 The design of backland development must be based on a clear understanding of the effects that this type of development has on character and residential amenity. Problems that can occur which must be avoided, or minimised to an acceptable level, are:

- Loss of privacy and spaciousness;
- Loss of daylight;
- Inadequate access;
- Loss of green/garden space;
- Enclosure of public utility services;
- Loss of car parking;
- The prejudicing of future development through piecemeal development.
- Poor aspect onto 'dead frontages' or rear lanes.

2.11 Backland sites may have a considerable number of 'dead frontages' surrounding the site boundary (i.e. fences or walls) which will need to be taken account of in the design. Layout should make the best use of maximising a pleasant outlook for residents. Some appropriate sites (in particular backland sites) might consider arranging buildings around a central courtyard space for houses to look out onto.

2.12 Tandem development is a form of backland development where one new house is placed directly behind another, both sharing the same vehicular access or driveway. This form of development is generally unacceptable because of the impact on the residential amenity of the dwelling at the front of the site.

Tandem Development



Development must not have a detrimental effect on residential amenity and consequently tandem development is normally unacceptable.

Backland Example



This backland development comprises of land to the rear of the main house. It is successful in terms of:

Scale

The new dwellings are of a subservient scale and the roof pitch mirrors that of the main house.

Layout

There is sufficient amenity distance between the existing house and the new dwellings.

Garden

The main house has been left with a useable private garden space. The three new dwellings have individual small private amenity spaces to the rear.

Materials

The materials of the main house have been carried through the development.

Overlooking

The window on the side elevation of the new dwellings creates some overlooking to the side road.

Boundary

The side of the backland buildings are close to the highway and is appropriate to this particular side street setting. Some landscaping has been included to enhance the boundary.

Parking

A parking court has been integrated behind the garage as part of the design of the development. The garage itself is not overly dominating in the street due to the choice of matching materials. In this context, a subservient side street, a garage fronting the highway is acceptable, but this would not normally be acceptable on a street with strong housing frontages.

●●●● Site redevelopment

2.13 Site redevelopment may involve the redevelopment of any type of building, but proposals to redevelop dwellings by replacing original houses with larger ones, dividing large plots into two smaller ones and redeveloping single/multi dwelling plots for flats are becoming increasingly common.

2.14 It is important to strike a balance between maintaining the established positive character of a residential street and introducing additional housing. To avoid a 'town cramming' effect, any proposals must:

- Maintain a useable amenity space or garden for new as well as any existing dwellings/occupiers;
- Maintain an established spacing between buildings that respects the pattern of layout in the vicinity of the site;
- Maintain appropriate scale and massing which respects buildings in the vicinity of the site;
- Respect the frontage building line and respond to the existing street scene.

The Design and Access Statement should show how these elements have been addressed.

2.15 The intensification of a site often means that additional car parking needs to be accommodated within the site boundary. Parking design is an important consideration with all infill development (see section on Parking), but the increased unit densities can specifically create problems for site redevelopment. Front gardens are important for biodiversity, amenity, drainage, street character and therefore parking should not intrude on these areas where they contribute to the character of the area. Parking should be designed and sited to encourage the use of street frontage to access dwellings. Proposals which create car-dominated frontages that harm the street scene, and/or create blank frontages at the ground floor will not be accepted.

Redevelopment Example



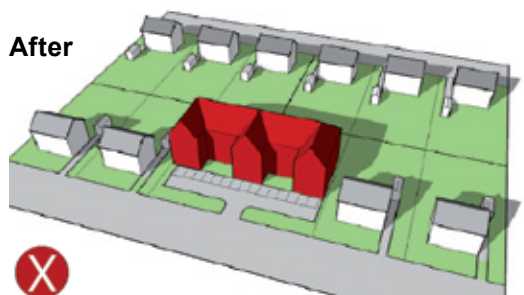
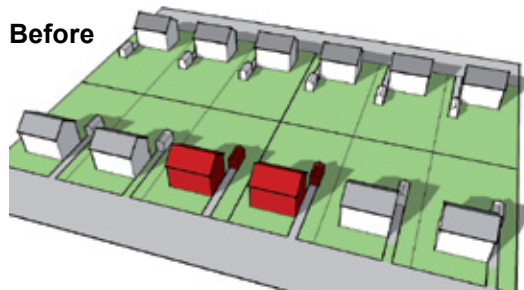
This redevelopment maintains appropriate space between dwellings and is of appropriate scale and massing on the corner site. The layout is designed around the existing landscaping on site and the buildings are set back into the plot to respond to the character of the area.

To help maintain the character of the streetscene, more consideration could have been given to the boundary wall detailing, in terms of continuing the pillared pedestrian entrances prevalent in the street.



Opposite the redevelopment

Poor Redevelopment



Existing site consisting of a strong pattern of 2-storey detached houses prior to development.

Unacceptable redevelopment that fails to respond to the urban grain and existing character of the area. Parking should not dominate the frontage.

3.1 New infill development is required to be of good design which encompasses sustainability principles, and make a positive contribution to the creation of distinctive communities, places and spaces.

3.2 The following design objectives should be used as guidelines for achieving good design, and how these objectives have been considered in the design should be made clear in the Design and Access Statement. The objectives should be considered in conjunction with the appropriate information in the Householder Design Guide (2007) and the Residential Design Guide (2008). Infill development requires special attention paid to context, the spatial characteristics of an existing street scene, and the building's relationship with space.

●●●● Sustainable Buildings

3.3 Current and future requirements for meeting the CFSH (Code for Sustainable Homes) and BREEAM standards are outlined in Planning Policy Wales. The technical guidance on the implementation of the national policy on planning for sustainable buildings through the planning application process is outlined in TAN 22: Planning for Sustainable Buildings (2010).

3.4 The plans submitted with any planning application will need to show in detail how the sustainability credentials are being incorporated. A pre-assessment sustainability report should be included as part of the application to ensure that sustainability measures are considered at an early stage. The Design and Access Statement will need to clearly state the intended Code for Sustainable Homes attainment level and illustrate how sustainability requirements have been taken into account as part of the design process; reference should be made to TAN 12: Design (2009).

3.5 CFSH and BREEAM standards not only encompass the sustainability of the building fabric itself but also other aspects relevant to the site. Credits that are available to meet CFSH standards include matters such as the management of surface water run-off, lifetime homes, ecology, and waste storage. Development will also be subject to local and national policies on avoiding unnecessary flood risk (see TAN 15).

3.6 Any intensification of development on a site may give rise to the possibility of more innovative and energy efficient heating systems becoming feasible. This potential should be explored in the Design and Access Statement in order to reduce carbon emissions from the development and offset the environmental impact of intensification.

3.7 Opportunities for compatible mixed use developments in appropriate locations can help to create sustainable communities and are supported by the Welsh Assembly Government (TAN 12, PPW). Buildings that are designed for adaptability and flexibility should be considered at appropriate sites. If social or economic conditions change in the future, buildings that are designed to accommodate change are more likely to have the opportunity to be able to be converted for alternative uses.

●●●● Quality of living

3.8 Infill, backland and site redevelopment must result in the creation of good places to live. This needs to be demonstrated through the quality of internal living space; private amenity space; and through adherence to principles relating to access, security, and legibility.

●●●● Inclusive Design

3.9 All development should be designed using an inclusive design approach. This means that design solutions should provide access to the widest possible range of people; there should be no barriers that create undue effort and separation. Reference should be made to TAN 12: Design para. 5.3; Inclusive Mobility (Department for Transport, 2002) and Design and Statements in Wales: Where, What and How (January 2011).

●●●● Character and context

3.10 A site analysis, design vision and character analysis of the adjacent townscape/ landscape must be prepared as part of the Design and Access Statement (DAS). The DAS should clearly illustrate how the criteria of this guidance and other relevant design policy have been met.

3.11 As an overarching guide for all residential development, the Residential Design Guide sets out the following list of design characteristics that should inform a character analysis:

- Locally distinct patterns of streets and spaces
- Urban grain/built form relationships
- Local or strategic views
- Building envelope : scale, mass, form, height, roof form
- Detailing and visual richness : window profiles, timberwork, building entrances, materials
- Layout: plot widths, set backs
- Topographical, microclimatic and ecological features
- Local patterns of landscape: front garden treatments, street trees

3.12 Infill development needs to be sensitive to its immediate surroundings and respond well to the built context. It is important that in residential areas where there is a clear existing pattern and form of development, that new buildings, landscaping and boundary treatment (e.g. gates, railings, walls and hedges) complement the character of the surroundings. A thorough understanding of detailing in the street scene which contributes to the form the character of the area needs to be gained and responded to.

3.13 Boundary treatments, including the means through which pedestrian/vehicles move from the building to the street, should be included in the character analysis as part of the local patterns of landscape. The proportion of “active frontages” (such as entrances) to “dead frontages” (such as high walls and blank facades) in the existing street should be responded to in the development. In general, development should maximise active frontages, such as pedestrian entrances for ground floor units.

3.14 Proposals which have an impact on the countryside must respond sensitively to the landscaped context. Such areas of countryside exist in many areas within the settlement boundary, including the river corridors. Any infill proposals must be sensitively located and appropriately landscaped to respect the countryside setting and views into the countryside.

3.15 Proposals must respect the urban grain and consider locally distinct patterns of streets and spaces including:

- Elements of the form of the street (organic or regular),
- Predominant housing layouts (terraced, semi-detached or detached),
- Garden sizes

3.16 Materials (colour, texture and extent) used for roofing, walls, doors and window frames should respond to the dominant construction or facing material in the area; materials should either match exactly or be complimentary.

3.17 As part of the CFSS and BREEAM standard, materials may form part of the credits to achieving the sustainability rating. Materials that are more sustainable may have a markedly different appearance to the surrounding dwellings, but the choice and extent of the material should not harm the street scene. Achieving CFSS levels may not necessarily preclude the choice of more traditional materials.

3.18 Fenestration, openings and doorways of new developments should complement the size, proportions, design and rhythm of detailing of neighbouring properties. The roofline should comprise of appropriate design and pitch of roofs, ridge height, eaves level, and notice taken of any other relevant details in the street scene.

Responding to Character and Context

New infill



This is a re-development of a social club. It is behind a row of existing terraces where there is a heavily planted area containing a number of tree preservation orders. It is on the edge of Pontcanna Fields and Llandaff Fields Historic Park and Garden. It reflects elements of the historic Victorian terraces from the wider area and pays attention to detailing. The parking is sensitively integrated opposite the houses amongst the mature trees.



Some examples of historic character typically found in surrounding streets and nearby Conservation Areas

Responding to Character and Context



The infill development which is separate from the existing terraces makes a marked contrast in terms of architectural style, materials and its relationship to the street. However, the siting of the plot on the corner and the visual separation between the buildings, together with the modern interpretation makes a positive contribution to the character of the street. The white render ties in with the colour on the bay windows of the adjacent terraced properties and the roof material and colour adds an element of continuity between the buildings.



This infill development is a modern interpretation of the adjacent Victorian terraced form. It includes pedestrian entrances at the front of the dwellings to encourage active streets and respond to the character of the area. The building turns the corner with several windows for overlooking the street. Bin storage is integrated in the design.



Responding to Character and Context



This street has two adjacent infill developments with a different design response to context.

The end of terrace gap-site development matches the brickwork to the rest of the terrace, and continues the roof detailing. The recessed doorway and brick wall boundary treatment matches the style present in the rest of the terrace. The rhythm of windows is slightly different to the adjacent properties due to the narrow plot width constraints, but in this case does not harm the street scene. This building quietly integrates well into the existing character. Style of boundary treatment is continued

Adjacent to the end terrace is a contemporary redevelopment of a coach house. Whilst it is to the rear of the main house, it also fronts onto the side street. It responds well to context and to a variety of different elements in the streetscape.

●●●● Building plot and building line

3.19 Plot ratios should reflect those prevailing in adjacent properties. The amount of development which projects back into a site should echo the rhythm of the street and respect the existing neighbouring buildings in order to reduce the overbearing impact of any development. The Design and Access Statement should clearly illustrate the footprint of the proposal in relation to the built context.

3.20 The spaces between adjacent buildings often have as much impact on the character of the area as the form of the buildings themselves. Plots must be of sufficient width to accommodate buildings that fit well into the street scene and provide adequate visual separation where appropriate. Where existing plot boundaries form a distinctive part of the street scene, these boundaries should be retained and replicated through appropriate building design and landscape treatment. Any significant public views and vistas in the street scene, including between and beyond buildings, which contribute to the character of the area should be respected.

3.21 Development should seek to respond to the prevailing building line that is created by the main frontages of houses, taking into account how the buildings are set back from the street and any rhythms or patterns of existing development, or protrusions.

3.22 The prevailing depth of frontage should be maintained where it is a feature of the area that contributes to the appearance of the street.

Responding to Character and Context

Building line



The terraced form and the building line have been continued. This infill building was visually divided in half to maintain the rhythm of the buildings in the street. The architecture is modern and each 'half of the development' fits between two buildings of different architectural styles on either side and acts as a transition between them.

Building plot

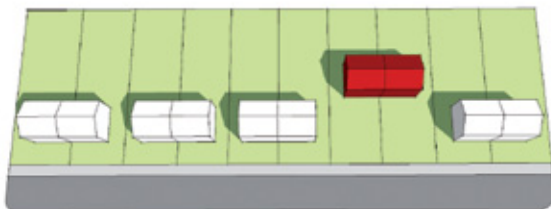
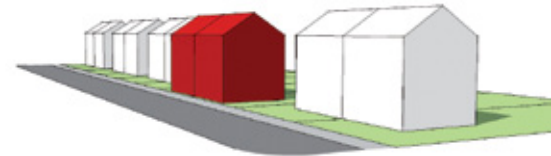
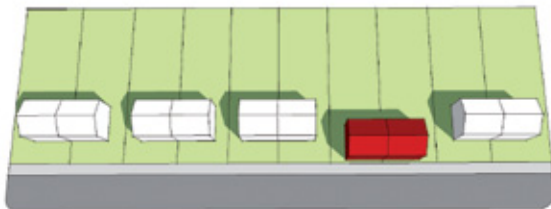
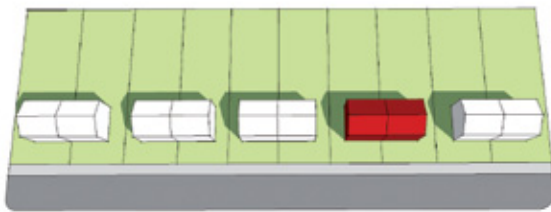


The modern infill building sits well in the corner site, allowing separation space between the historic terraces and the infill. The building line is consistent and the building projects back into the site to an appropriate distance.

Building Line

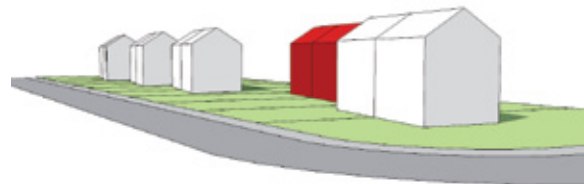
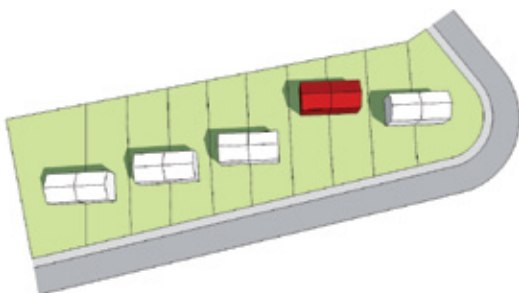
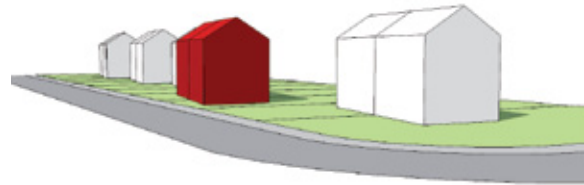
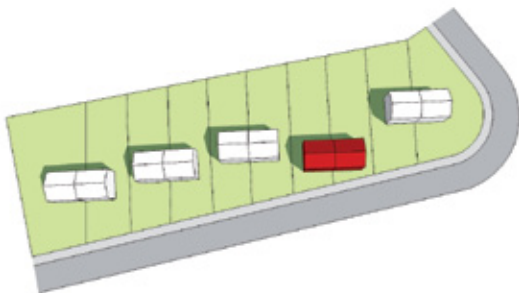
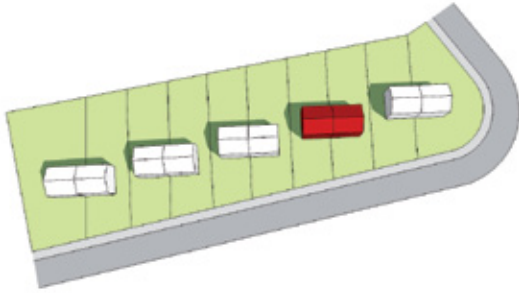
Where there is a consistent building line that adds to the character of the street, this should be maintained.

Straight building line



Building Line

Stepped building line



●●●● Height, scale and massing

3.23 The character analysis should show how the infill development has taken account of and responded to existing building heights (number of storeys and floor to ceiling heights), scale and massing of buildings in the street.

3.24 For a backland site, a less conspicuous building of a lower scale in building height is often more appropriate to minimise overbearing and reduce impact on residential amenity. Account should be taken of ground levels as development is likely to have a greater impact on neighbouring properties when it is located on higher ground.

3.25 Some appropriate sites may be able to accommodate slightly taller buildings where they make positive contribution to the street scene, such as corner sites, on primary routes, and in higher density areas with variation in heights and massing. Where a taller building is proposed, the end treatment should relate sensitively to the heights of the adjacent buildings so that the rhythm of the street is not interrupted; this will often result in an appropriate reduction of height. The use of sympathetic elevational treatments can be used to relate innovative or modern designs with a more traditional context. Roofs should remain in proportion with those in surrounding buildings to create a successful transition between new and existing development.

Height, scale and massing



This contemporary redevelopment of a garage site comprises of three-storey terraced housing. The end terrace has been reduced in height to act as a transition between the adjacent two-storey houses.

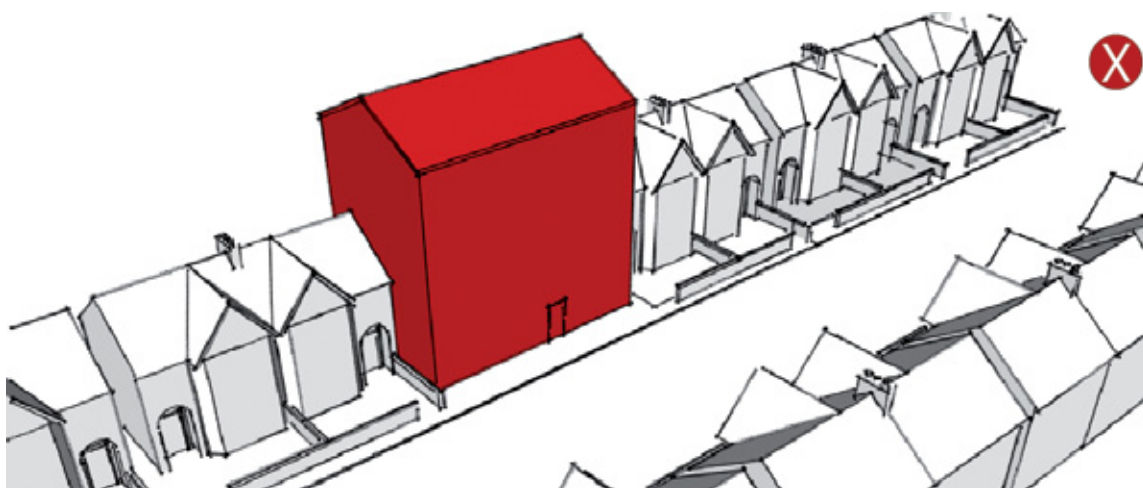
The height, scale and massing is appropriate for the site context, which consists of a substantial corner plot, a variety of existing building types, heights and characters, situated along a primary vehicular route with a wide carriageway.



The increase in height between the existing two-story housing opposite to three-storey development is not over-bearing given the scale of the street; the three-storey height helps to create a better sense of enclosure.



Building Line



The height and massing of this proposal fails to respond to the intimate scale and consistent character along the street.

●●●● Density

3.26 Infill, backland development, and site redevelopment can help to increase the efficiency of land and reduce demand for greenfield sites as outlined in PPW and Cardiff Local Plan Policy 11. However, the density of development, both in terms of scale and massing, as well as the number and type of units, should vary according to the site character and context and must respond sensitively to the scale, form and massing of existing development in the area.

3.27 The appropriate density of a scheme will be determined by the following criteria:

- Existing urban grain (pattern of streets, plots and buildings);
- Character and context of the surrounding area;
- The need to retain and preserve natural and manmade features within the site;
- The appropriate development capacity of the site - taking into account the need to protect privacy and amenity;
- The retention and/or provision of adequate garden space and parking provision;
- Proximity to public transport.

3.28 In general, the Council supports a range of density solutions, provided that they relate well to their surroundings. However, any increase in the intensity of existing accommodation will mean that careful consideration will need to be given to innovative solutions for useable amenity space, car parking provision, cycle storage and refuse storage facilities.

3.29 To minimise the need to travel by modes other than the private car, higher density development will be encouraged:

- Within walking distance of public transport nodes;
- Near corridors well served by public transport;
- In areas with the potential to be served by public transport;
- In the city centre and district centres.

Applications for higher density developments in such locations must also take account of all of the design criteria listed further above.

3.30 The impact of any additional parking required from higher density housing must be taken carefully into account and not dominate the street scene (see section Access and Parking, for further guidance). It is anticipated that development in areas with better access to services and public transport may be able to incorporate reduced parking provision in line with the Access, Circulation and Parking SPG (2009).

●●●● Open space, trees, and landscaping

3.31 Applications for development on areas which involve the loss of green or open space will be assessed against the following factors outlined in the Open Space SPG (2008):

- The level of provision of recreational open space;
- The amenity value of open space;
- The nature conservation value of open space
- The acceptability of compensatory facilities.

3.32 In addition to this, the safeguarding of areas of space that are valued for historic conservation reasons, or spaces that contribute to the local landscape and/or distinctiveness of an area will be sought.

3.33 In order to support sustainability objectives, such as encouraging walking and cycling between communities on linear greenways, and protecting carbon sinks and facilitating evaporative cooling, infill development should not take place on areas of green space that are part of an urban network of green spaces. Reference should be made to the Open Space SPG (2008), Biodiversity SPG (2006) and 'An Analysis of Accessible Greenspace Provision' (2008).

3.34 Trees and hedges provide visual amenity benefits, provide natural structure and enclosure to a site, a home, shelter or feeding place for a wide range of wildlife and a diverse range of environmental benefits including acting as a carbon sink, aiding natural drainage, cooling the air and absorbing pollution.

3.35 Development that would cause unacceptable harm to trees, woodlands and hedgerows will be resisted. The retention of and protection of the growing space for large trees, or those capable of achieving large size, is especially desirable since these trees provide the greatest benefits to visual amenity, biodiversity, cooling, carbon accretion and sustainable drainage. Developers should always check whether trees on or adjoining properties are subject to a TPO (Tree Preservation Order). Trees on, and adjoining a site will require assessment in accordance with the Trees and Development SPG (2007), prior to the submission of a planning application. This assessment must inform the site layout and design.

3.36 In addition to trees, the site layout must consider all existing natural and semi-natural features such as hedges, open and vegetated soil, and the contribution these features make. The retention or incorporation of such features in a development play a crucial role in ensuring that the development is consistent with principles of sustainable development.

3.37 New trees and landscaping will be encouraged on development sites, even when there is no loss of existing trees. It is unlikely that a new landscaping scheme will be considered adequate replacement for existing site features. Any new landscaping should incorporate species that will provide long term benefits to visual amenity, biodiversity and to minimising the effects of climate change. The planting of species that are considered well adapted to climate regimes likely to prevail in the near future will be supported. The landscaping scheme should be drawn up with the involvement an appropriately qualified person.

Important natural features should influence site layout.



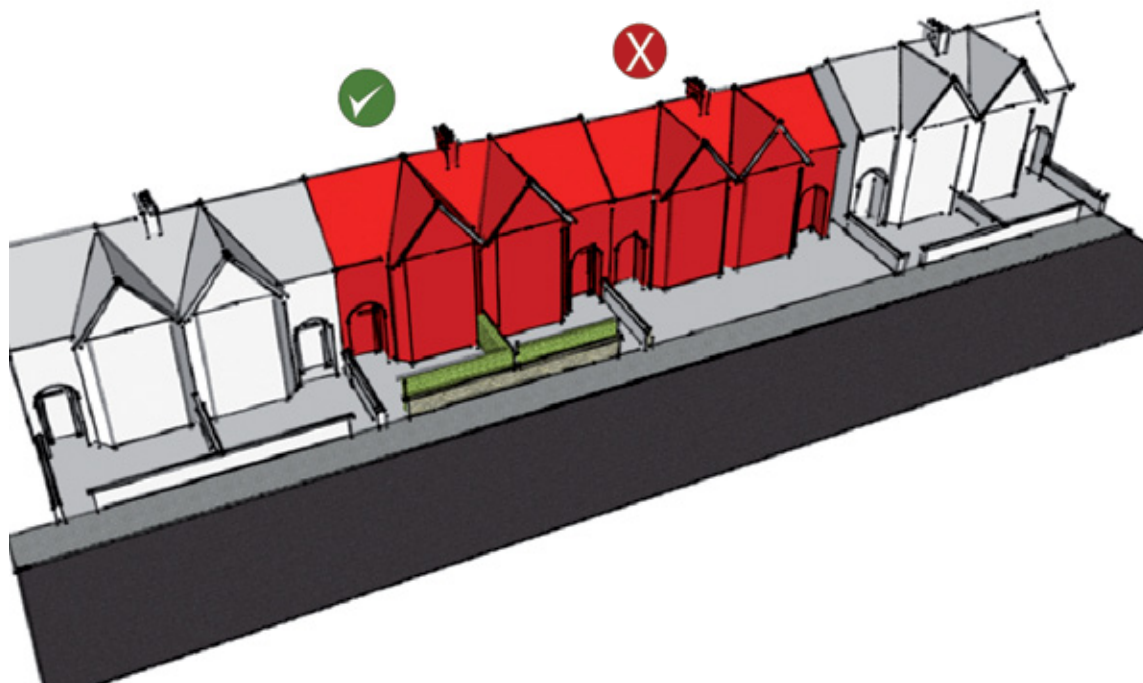
●●●● Boundary treatment

3.38 Boundary treatment fronting onto a highway or public space makes a significant contribution to the character of the area: it visually affects the street scene, influences street activity and effects pedestrian and vehicular movement. Boundaries should create a successful interface between a building and the street or open space, and should not result in blank facades or create dead space. Boundary treatments should be high quality, balance security needs with providing good natural surveillance and not create a 'fortress' feel to the development.

3.39 Attention to detail is particularly important in infill and site redevelopment sites as a poor boundary treatment or one which deviates from the prevailing type of boundary treatment prevalent in the area may harm the existing character of the street. Where there is a clear type of successful boundary treatment prevailing in the immediate area, the proposal should closely match that in terms of size, and materials (whether soft landscaping, brick, or railings, for example). The entrances along the boundary will need to mirror the rhythm and setting of existing entrances in the area.

3.40 Boundary treatments alongside communal areas, such as parking areas, should be high quality and easily maintained (i.e. brick walls rather than close-boarded fences).

The character of boundary treatment should be maintained along the street.



●●●● Designing out crime

3.41 All developments must demonstrate how they positively contribute towards safe and secure environments (such as providing natural surveillance together with a sense of ownership), and these measures should be effective, and proportionate to the local crime risk factors. Reference should be made to the Cardiff Residential Design Guide (2008). More specific guidance can be found in the Cardiff Community Safety Partnership's *As Safe as Houses? – Crime and the Built Environment* (2006). South Wales Police can provide information on how to achieve the 'Secured by Design' award. Further information can be obtained from www.securedbydesign.com.

●●●● Vehicular access and parking

3.42 Sustainable development should encourage use of alternative means to the car where possible, such as walking, cycling and public transport. Cycle parking provision should always be an integral part of the design of the development. The principles of *Manual for Streets 1 and 2* should be employed with increased consideration given to the place function of streets.

3.43 The car is recognised as an important transport method and account needs to be taken of parking in line with the *Access, Circulation and Parking Standards SPG* (2010). Both vehicular and cycle parking must not be detrimental to the streetscene, urban vitality or the historic built environment.

3.44 Where car parking is necessary, provision should be effectively incorporated into the design of the development as a whole and should not be superimposed later. The effect of intensifying a site means that additional car parking may need to be accommodated within a confined site boundary. Innovative design solutions that minimise impact on the street scene and on the amenity of neighbouring properties are encouraged. Parking (for gap site development in particular) should help to define an attractive and well used street, and promote the use of front entrances to dwellings, (see Residential Design Guide (2008) for further guidance). Proposals which create car-dominated frontages that harm the street scene and/or create blank frontages at the ground floor will not be accepted.

3.45 Parking areas and driveways are encouraged to incorporate permeable materials to create sustainable drainage. This is particularly important in areas that have been previously vegetated. Car parking should not impinge on the quality of amenity space or natural space. This can be submitted as part of the CFSH or BREEAM standards accreditation. Permitted Development rights may need to be removed in some cases to ensure that paving is not replaced with impermeable paving at a later date.

3.46 It may be appropriate for existing access arrangements to serve infill redevelopment where it helps to maintain the appearance of the street frontage. Where new access is necessary, it must be located in a safe and visible location, with clear visibility splays and set away from junctions or other hazards.

3.47 New driveways should be appropriate to their context. New driveways serving rear garden development should be positioned to minimise the noise disturbance to neighbouring dwellings.

3.48 In central areas and other areas of higher density, in order to make efficient use of land, the utilisation of the minimum number of car parking spaces in line with the Access, Circulation and Parking SPG (2009) is encouraged. Where development is in the central area (see Parking SPG) this may include no parking provision. The merits and circumstances of each planning application need to be taken into account when applying parking standards, including cycle parking, blue badge parking provision, visitor parking, and a range of locational and contextual factors to consider with each planning application are outlined in the Access, Circulation and Parking SPG.

Parking



Additional parking spaces have been sensitively incorporated away from the street within this backland development and are overlooked from the front of the new dwellings.

4.1 Any infill, backland or site redevelopment must consider both the new and future occupiers' amenity, as well as neighbouring amenity of nearby dwellings.

●●●● Gardens and open amenity space

4.2 All new residential dwellings, as well as existing dwellings affected by the development, should maintain useable and appropriate external amenity space. This space should be integrated within the design proposals and not just be 'left over space' after planning.

4.3 It should be demonstrated that the size and type of external amenity space is appropriate to the type of development and to the urban grain of the area.

4.4 Amenity space can provide many different functions, such as a secure playing space for children, a horticultural area, or a place for sitting outside in the fresh air. The size and nature of private or shared amenity space, will be dependent on a range of contextual circumstances, such as the type of accommodation, the form, density, location and access to nearby public open space. The purpose and design of the space for the end-users should be made clear in the Design and Access Statement. Amenity space should be adjacent or in close proximity to the dwelling and be wheelchair accessible.

4.5 Houses and ground floor flats that will serve as family accommodation should include enclosed and secure private amenity areas. Depending on context, such amenity areas should measure at least 10.5m in depth or 50m² overall.

4.6 Types of shared amenity space such as roof gardens, roof terraces, communal gardens and areas for play can be suitable in some forms of development. Where a proposal is of a size or nature that triggers specific requirements for public open space (with reference to the Council's approved Open Space SPG), this should be sought on-site wherever practical.

4.7 Consideration needs to be given to the retention of existing trees and functioning vegetated soils (e.g. grass, shrubs, or an area for growing vegetables), and the introduction of new trees and soils as part of amenity space where practicable. Refer to section on 'Open space, trees, landscaping and boundary treatment.'

4.8 Existing houses affected by new development should maintain reasonable garden sizes (both front and back), appropriate to house and surrounding area. Properties which have contributed land for backland or infill development must not be left without reasonable and useable gardens or parking spaces where they already have them. Existing access for pedestrians and vehicles should be retained.

Amenity space



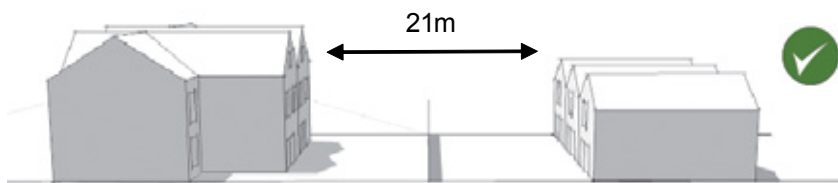
This example of a well-used shared amenity space is within a perimeter block development, Coin Street, London. The ground floor units have individual private spaces which back onto private communal space that is shared by all of the occupiers.

●●●● Privacy, overlooking and overshadowing

4.9 New developments should allow for adequate privacy for the occupiers of the proposed buildings as well as for neighbouring properties. Normally, a minimum of 21m should be maintained between principal windows to habitable rooms. However, it may be possible to achieve privacy with a combination of separation distance; appropriate position and aspect of habitable rooms; screening; building orientation; window positioning, size and style of window; and placement of gardens. Design proposals will need to demonstrate how an adequate level of privacy has been provided for habitable rooms within each dwelling. The minimum overlooking distance from a habitable room window to a garden area of a separate dwelling should be 10.5m. Relying on obscurely glazed windows or non-opening windows is not a preferred means of achieving privacy.

4.10 Dual aspect dwellings (where windows are found on two external walls) are preferable to single aspect units. There will be a presumption against single aspect units unless the design is shown to allow adequate daylight and ventilation to all habitable rooms.

Privacy



21m allows privacy created by distance.

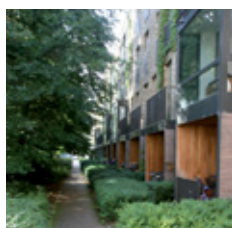


If the angle of rotation is more than 30 degrees, dwellings could be brought slightly closer together. Account needs to be taken of building height.

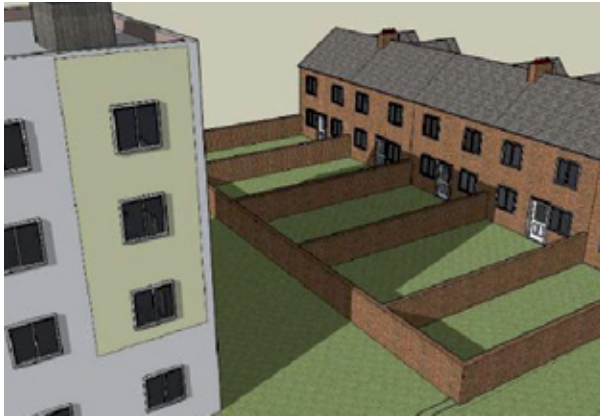


Innovative design solutions, as exhibited by Accordia in Cambridge, show that a narrow mews doesn't have to compromise privacy if the windows are staggered and designed accordingly. These narrow, urban spaces are successful here because of a range of influencing factors, including:

- The buildings are of an appropriate layout and scale;
- The mews forms part of a designed hierarchy of streets;
- The narrowness is complimented by wide shared courtyard spaces to the rear,
- The mews are very close good quality, accessible public open space.



4.11 To safeguard the amenity of existing residents, proposals must not result in unacceptable harm regarding the level of overbearing, overshadowing or overlooking of neighbouring properties.



This proposal is too overbearing on the neighbouring properties.

5.1 Development within a conservation area, or that which would affect the setting of a conservation area, will only be permitted where it preserves or enhances the character, or appearance of the area. Each of the Council's twenty-six adopted Conservation Area Appraisals (2009) outlines the historic significance of an area, contains a character assessment and recommends opportunities for the enhancement of that character. It also has further guidance for homeowners and those planning development within a conservation area. The appraisals were adopted following public consultation, and should be read in conjunction with this SPG.

5.2 Conservation Area consent is normally required for the demolition of a building within a conservation area. There are some exclusions on which the Local Planning Authority can advise.

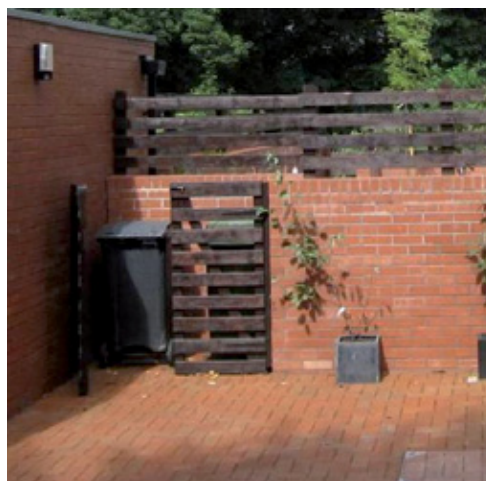
5.3 Listed Building Consent is required when demolition, alteration or extension, which affects the character of a statutory listed building, is proposed. Alterations to listed buildings will only be acceptable where they relate sensitively to the building and preserve its character. In assessing an application the Council has a statutory requirement to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

5.4 Separate to the statutory buildings listed by Cadw, the Council holds a list of buildings in Cardiff that have been locally listed. The purpose of local listing is to ensure that a building's locally important architectural or historic interest is recognised.

6.1 Adequate provision must be made for composting, recycling and waste facilities within the guidelines of the Council's Waste Collection and Storage Facilities SPG (2007). Appropriate access for collection will also need to be accommodated where the site has been redeveloped for multi dwelling plots of flats. Innovative solutions for waste management should be integrated into the design of the development and should be achieved with minimal impact on the quality and vitality of the public realm and the amenity of neighbouring and future residents.



Wheelie-bin storage for refuse and recycling should be thoughtfully designed into the development.



The Welsh Assembly Government supports the use of Supplementary Planning Guidance (SPG) to set out detailed guidance on the way in which the development plan policies will be applied in particular circumstances or areas. SPG must be consistent with development plan policies and national planning policy guidance and may be taken into account as a material planning consideration in planning decisions.

Planning Policy Wales sets out the Welsh Assembly Government's land use planning policy in respect of promoting sustainability through good design. Good design is not just about the aesthetics of a development, but also includes the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.

The Code for Sustainable Homes and BREEAM standards that are expected to be met are stated in paragraph 4.11.4 of PPW (2010).

Chapter 9 (Housing) outlines policies on designing good quality, affordable housing, and advises that sensitive infilling may be acceptable, although this will depend the character of the surroundings. Insensitive infill development, including conversion and adaptation, that would damage an area's character or amenity should be not be allowed.

PPW (see Chapters 4 and 9) provides information specifically on infill development in the countryside.

Safe environments should be produced through good design, and local authorities are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime may be material considerations in the determination of planning applications.

Technical Advice Note (TAN) 12: Design (2009) advises on how promoting sustainability through good design may be facilitated through the planning system. Good design in the built and natural environment should deliver environmental sustainability, economic development and social inclusion. Buildings, places and need to be well designed, flexible and adaptable, achieving a high quality public realm, vibrant streets and active neighbourhoods.

Legislation requires a Design and Access Statement (DAS) to accompany applications for all new dwellings. The DAS should include a full design appraisal of the site and will need to illustrate how sustainability requirements have been taken into account as part of the design process. Following this, it should explain and justify the objectives and concepts on which a development proposal is based and how this will be reflected throughout the scheme. TAN 12: Design provides an outline of the broad content of a DAS for planning permission and listed building consent.

TAN 15: Development and Flood Risk (2004), Paragraph 6.2, states that new development should be directed away from zone C, and that new development should only be permitted within zones C1 and C2 if determined by the planning authority to be justified in that location. As part of this justification, an applicant should undertake and submit a flood consequence assessment (FCA) prior to determination of an application that meets the criteria set out in TAN 15. TAN 15 also states that highly vulnerable development (such as residential use) should not take place in zone C2.

TAN 22: Planning for Sustainable Buildings (2010) provide technical guidance on the implementation of the national planning policy (PPW) on planning for sustainable buildings through the planning application process. It is targeted towards the development industry in ensuring that development becomes more sustainable and responsive to the challenges of climate change. As of 1st September 2010, these standards will apply to one dwelling or more.

Manual for Streets 1 and 2 (Department for Transport, 2007; 2010) is endorsed by the Welsh Assembly Government and gives emphasis on the place function of streets. It recommends that designers should place a higher priority to the needs of pedestrians, cyclists and public transport users over motor vehicles.

Design and Access Statements in Wales: Where What and How (2011), has been written as an easy reference guide by Design Commission For Wales, to assist those involved in writing and submitting applications for planning permission or listed building consent in Wales.

City of Cardiff Local Plan – (adopted January 1996) This guidance supplements Policy 11 (Design and Aesthetic Quality) of the City of Cardiff Local Plan, which states: ‘All new development should be of good design which has proper regard to the scale and character of the surrounding environment and does not adversely affect the aesthetic quality of the area.’

The Cardiff Unitary Development Plan - The Cardiff UDP was placed on deposit in October 2003. In May 2005, following agreement with the Welsh Assembly Government, the Council resolved to cease preparation of the UDP and commence work on a new Local Development Plan (LDP). Assembly guidance indicates that a UDP that has not been adopted may remain a consideration in development control decisions. The weight to be attached to policies and proposals in the UDP depends on the extent to which they may conflict with those in the adopted plans and whether objections to them were raised through deposit.

Policy 1B (Achieving Good Design) of the deposited Cardiff UDP states: ‘Good design will be sought in all development’

Policy 2.20 (Good Design) of the deposited Cardiff UDP states: “All development will be required to demonstrate good design by:

- Satisfactorily responding to local character and context;
- Achieving a legible development which relates well to adjoining spaces and the public realm;
- Providing a safe and accessible environment for everyone who might use or visit it;
- Providing for the efficient use of resources and adaptability to changing requirements;
- Satisfactorily addressing issues of layout, density, scale, massing, height, detailing and landscaping”.

Emerging Cardiff Local Development Plan (2006-2026) – It is anticipated that the forthcoming LDP policies will require new development to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces.

Cardiff Conservation Area Appraisals (2009) – A conservation area is defined as: an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. The Council has prepared twenty-six conservation area appraisals which should be read in conjunction with this SPG.

Affordable Housing Delivery Statement (2010) – The Statement introduces an interim site threshold and target quota policies for provision of affordable housing contributions in advance of the adoption of the Local Development Plan. The Affordable Housing SPG (2007) provides the basis for the Council to seek contributions from developers towards affordable housing.

Cardiff Council

Planning advice, Building Control advice, maps to download of Conservation Area Boundaries, advice on statutory considerations listed above.

www.cardiff.gov.uk

Development Control - planning permission, pre-application discussions, Conservation Area and Listed Building Consent.

developmentcontrol@cardiff.gov.uk

(029) 2087 1135

Building Control – Building regulations.

buildingcontrol@cardiff.gov.uk

(029) 2087 1363/1377/1153

LDP (Local Development Plan)

developmentplan@cardiff.gov.uk

(029) 2087 3469

Sustainable Development

sustainabledevelopment@cardiff.gov.uk

(029) 2087 3228

Conservation and Historic Buildings

conservation@cardiff.gov.uk

(029) 2087 3485

Biodiversity

biodiversity@cardiff.gov.uk

(029) 2087 3227

Tree Protection and Hedgerows

treeprotection@cardiff.gov.uk

(029) 2087 3189

Other Organisations

BRE Wales – Provides best practice guidance on sustainable development in Wales.

www.bre.co.uk

BREEAM (BRE Environmental Assessment Method) – one type of method for measuring a building's environmental performance.

(01923) 664462

www.breeam.org

Cadw – The Welsh Assembly Government's historic environment service.

www.cadw.wales.gov.uk

(01443) 336000

Code for Sustainable Homes (CFSH) - the national standard for the sustainable design and construction of new homes

www.communities.gov.uk/planningandbuilding/sustainability

Design Commission for Wales – National organisation providing design review service.

www.dcfw.org
(029) 2045 1964

Design Council – Merged with CABE (Commission of Architecture and the Built Environment) to provide design support and advice to industry and communities

www.designcouncil.org.uk

Housing Design Awards - Office of the Deputy Prime Minister's recognition of excellence in the design and planning of new homes.

info@hdawards.org
(01279) 653 330

Landscape Institute - chartered body for landscape architects

www.landscapeinstitute.org

Planning Aid Wales - An independent, charitable organisation helping individuals and communities across Wales to participate more effectively in the planning system.

www.planningaidwales.org.uk
(029) 2062 5000

RSAW – Royal Society of Architects in Wales is the regional organisation of the Royal Institute of British Architects (RIBA).

www.architecture.com
(029) 2022 8987

RICS Wales – Royal Institute of Chartered Surveyors.

www.rics.org/wales
(029) 2022 4414

Secured by Design – Award scheme managed by the Association of Chief Police Officers Crime Prevention Initiatives.

www.securedbydesign.com
South Wales Police Crime Prevention Design Advisor (Eastern):
(029)20 571501

Public consultation on the SPG was undertaken between 10th January -18th February 2011. A press notice was placed in the South Wales Echo on 10 January 2011 and notices and copies of the draft guidance were placed in all Cardiff libraries and at City Hall and County Hall. The draft guidance was also published on the Council website.

Letters notifying that consultation was being undertaken on the draft guidance were sent to all Cardiff councillors, the Welsh Assembly Government, Community Councils in Cardiff and the following that are known to have general interest in planning in Cardiff or a potential interest in this guidance:

- Alder King
- Arboricultural Association
- Arup
- Asbri Planning
- Atisreal Limited
- Atkins
- Austin-Smith:Lord
- Baker Associates
- Barratt Homes
- Barton Willmore Planning Partnership
- BCB International Ltd
- Bovis Homes Ltd.
- Boyer Planning
- Bryant Homes South Wales
- C2J Architects
- CADW
- Cadwyn Housing Association
- Caerphilly County Borough Council
- Campaign for Real Ale
- Cardiff & Vale Coalition of Disabled People
- Cardiff Access Group
- Cardiff Civic Society
- Cardiff Community Housing Association
- Cardiff Cycling Campaign
- Cardiff Friends Of The Earth
- Cardiff University
- CFW Architects
- CGMS Consulting
- Civic Societies of Cardiff and Penarth
- Civic Trust Wales
- Coal Authority***
- Connections Design
- Conservation Advisory Groups
- Cooke & Arkwright
- Council for British Archaeology
- Council for the Protection of Rural Wales
- David Preece, Architect
- David Wilson Homes (South West)
- Davies Sutton Architects
- Defence Estates
- Derek Prosser Associates
- Design Circle - RSAW South
- Design Commission for Wales***
- Design Group 3 Architects
- Disability Wales

- DLP Consultants
- DPP
- DTB Design
- DTZ Piedad Consulting
- Dwr Cymru Welsh Water
- Energy Savings Trust Ltd
- Environment Agency Wales***
- Fairwater/Pentrebane PACT
- Fields In Trust***
- Firstplan
- Friends of Nantfawr Community Woodland
- Friends of the Earth
- Friends of the Earth Cymru
- G Powys Jones
- Georgian Group
- Gerald Eve LLP
- GL Hearn
- Glamorgan-Gwent Archaeological Trust Ltd
- Glamorgan Gwent Housing Association
- GVA Grimley
- Hallam Land Management
- Harmers Ltd
- Home Builders Federation
- Hyland Edgar Driver
- Jacobs UK - Cardiff
- John Wotton Architects
- Knight Frank
- Landscape Institute Wales
- Level Ltd
- Lisvane Community Association
- Lisvane Graig Protection Society
- Living Streets Cardiff
- Llandaff Society
- Lovell Partnerships Ltd
- Loyn & Co Architects
- Malcolm Scott Consultants Ltd
- Mason Richards Planning Bristol
- McCarthy & Stone PLC
- Morgan Cole
- Nathaniel Lichfield & Partners Ltd
- National Grid Property Holdings
- Newport City Council
- NPFA Cymru
- Paul Dickinson & Associates
- Peacock and Smith
- Pegasus Planning Group
- Persimmon Homes
- Peter Brett Associates
- Peterson Williams Architects
- Philippa Cole, Planning Consultant,
- Planning Aid Wales
- Planning Issues
- POSW - Planning officers' Society Wales
- Powell Dobson
- RPS Planning Transport & Environment

- Redrow
- Reservoir Action Group
- Residents Action Committee
- Rhondda Cynon Taf CBC
- RICS Wales
- RIO Architects
- Robertson Francis Partnership
- Rounded Developments
- Royal Society Architects in Wales
- RTPI Wales
- Rumney Community Development Assoc.
- Savills
- Shawn Cullen
- SK Designs
- SLR Consulting Ltd
- Society for Protection of Ancient Buildings
- South Wales Police***
- Stedman Architectural
- Stephen Hobday MBE Chartered Architect
- Stride Treglown
- Strutt and Parker
- Sullivan Land and Planning
- Sustrans***
- Taff Housing Association
- Tanner & Tilley
- Taylor Wimpey Developments Ltd
- Terry Nunns Architects
- The 20th Century society
- The Planning Bureau Ltd
- Transco
- Trowbridge Mawr Neighbours & Residents Action Group
- Turley Associates
- Urban Solutions Ltd
- Vale of Glamorgan Council
- Victorian Society
- Wales & West Housing Association***
- Wales and West Utilities
- Watts and Morgan
- Welsh Assembly Government
- Welsh Federation of Housing Associations
- Welsh Health Estates
- Western Power Distribution (South Wales) PLC
- White Young Green Planning
- Wigley Fox Partnership

Comments specifically or generally relevant to the draft guidance were received from the above consultees indicated with *** and from:

- Cllr. R Cook (Canton)
- Cllr. S Pickard (Cathays)
- Cllr. M Jones-Pritchard (Whitchurch & Tongywnlais)
- Cllrs. J Cown, A Robson, B Jones (Rhiwbina)
- Radyr and Morganstown Community Council (R&MCC)
- St Fagans Community Council
- Jane Hayes (individual)

Paragraph (Consultation Draft)	Comment	Response
General	The Design Commission for Wales consider that the SPG provides some inspirational guidance to allow applicants to aspire to a high standard of development on important infill/ brownfield sites.	No change
General	The document is well thought out and addresses the many aspects of design to be considered when proposing new buildings in infill situations.	No change
General	R&MCC welcome this detailed information. We would be both pleased to use it ourselves and to give it to residents when considering applications. We think that the document is well drawn up and illustrated with good and bad examples clearly shown.	No change
General	We very much welcome the guidance and believe that it will help the planning process to improve the standard and quality of development of infill sites throughout the City.	No change
General	The St Fagans Community Council are in full agreement with, and support the guidance.	No change
General	Wales & West Housing Association consider that the guidance is clear, concise and very informative.	No change
General	The Coal Authority have no specific comments to make.	No change
General	I would welcome a statement in the document to note that the Council is willing to request a S106 contribution, even for relatively small in-fill developments, as a contribution towards activities in the local area that would help alleviate impact on general amenity (parking, waste etc).	New paragraph added between 2.3 and 2.4
General	The quality of the photograph is poor and so although they provide excellent examples of the good examples and poor examples off infill development it is not always easy to see them.	The quality of the images is reduced because of the compressing process of the document to reduce MB. For the final document the photos will be made clearer
General	The document refers to using a qualified Landscape Architect and Police Architectural Liaison Officer, but no reference to an Architect. Perhaps it would be better to remove specific recommendations other than a recommendation to use appropriately qualified persons for the various requirements, and then add an appendix with sources of those persons, to include the SAW, RIBA, Landscape Institute, South Wales Police etc.	Text amended and list of contacts added to appendix B

Paragraph (Consultation Draft)	Comment	Response
General	I would like to raise my concerns regarding the methods of consultation employed for this SPG by Cardiff City Council. SPG is urgently needed to inform the planning process, but it is important that residents of Cardiff are not disenfranchised by the consultation process.	The SPG consultation process will be reviewed
General	The document is well thought out and addresses the many aspects of design to be considered when proposing new buildings in infill situations.	No change
General	Consideration should be given to a site's former use. There maybe some potential infill development sites that are affected by contamination, e.g. a former garage or petrol filling station.	Contamination can be dealt with through remediation works.
General	Flood Risk - Section 6.2 of TAN 15: Development and Flood Risk (July 2004) states that new development should be directed away from zone C, and that new development should only be permitted within zones C1 and C2 if determined by the planning authority to be justified in that location. As part of this justification, an applicant should undertake and submit a flood consequence assessment (FCA) prior to determination of an application that meets the criteria set out in TAN15. TAN15 also states that highly vulnerable development (such as residential use) should not take place in zone C2. We consider it would be appropriate to highlight in this SPG, that any new infill development proposed in zone C will require a FCA to ensure that all parties, including your Authority, are aware of the risks to and from the development, and ensure that if practicable, appropriate controls can be incorporated in a planning permission to manage the risks and consequences of flooding.	Information regarding TAN 15 added to Appendix
Introduction	The introduction should be clear in setting out its overarching aims and objectives of the SPG, rather than detailing particular sustainability credentials.	A list of aims have been added and changes made to introduction
1.3	Reference should be made to Manual for Streets 1 & 2 and throughout the rest of the document.	References added
1.4	Sustainable development also needs a co-ordinated approach to site infrastructure including transport connections – existing and proposed.	Following revision of the introduction, it is considered that this particular element of sustainability is an issue to cover at LDP level.

Paragraph (Consultation Draft)	Comment	Response
1.5	The addition to the environmental and biodiversity consequences, the importance of how contextual analysis has been used to influence the design response should be outlined in Para. 1.5. The importance of built heritage and its contribution to placemaking should be noted.	Paragraph and introduction reviewed to be more overarching, details of biodiversity removed as it is covered subsequently in chapter 3.
1.10	I think there needs to be a specific reference to both the Affordable Housing Delivery Statement (AHDS) and the Affordable Housing SPG because the threshold for an affordable housing contribution (in the AHDS) is required on sites of 10 units or more	New paragraph added between 1.10 and 1.11. Added to list in 1.10
Chapter 2	Can there be more reference to landscape setting within more rural locations that are within the settlement boundary?	More references to landscape context added into chapter 2 and Chapter 3.
2.2	Site context and adjoining townscape should influence the appropriate density/intensity of development.	Text added
2.3	Avoid the use of terms such as 'landmark' 'contemporary' or 'traditional' which can be open to abuse. The design response should be a positive contribution to the context of the area.	Text amended
2.5	All photos should be up to date, inspirational and clearly referenced to allow site visits. It is not clear how the examples used respond to their context. Consider using examples outside Cardiff if appropriate.	Three photos have been reviewed and amended in line with other comments received. Photos will not be referenced to protect resident's privacy. Additional context photos can be added at final editing stage.
2.8	Outlook/aspect is a common problem in some backland sites and should be addressed.	Aspect added to list of constraints in paragraph 2.8. An additional new paragraph added below.
2.9	Reference should be made to how the Design and Access Statement will need to demonstrate a vision for the scheme base on a contextual/ townscape analysis.	Reference to DAS removed in section 2.9 as it is relevant to all types of infill and instead the point is re-iterated in section 2.3

Paragraph (Consultation Draft)	Comment	Response
2.13	It should be stated that parking should not be allowed to intrude into amenity space/gardens. Reference should be made to the importance of front gardens, biodiversity and Sustainable Urban Drainage Systems. The illustrative images are very poor quality and do not provide clear analysis of example.	Text amended. Additional photos may be added for final editing
3.1	The importance of quality infill design and place making should be made first, prior to referring to guidance	Text added
3.3	Amend text to read: Following a contextual/ environmental/sun path analysis influencing the optimum orientation for the proposals, pre- assessment report, carried out by a BREEAM/CSH assessor, should be included and reference should be made to TAN 12 and TAN 22.	Technical guidance is detailed within TAN 12 and TAN 22. Reference is made to these documents
3.4	Add see TAN 15 to end of final sentence.	Reference added
3.5	Amend to read; <i>Any intensification of development on a site may give rise to the possibility of more innovative and energy efficient heating systems becoming feasible. This potential should be explored in the Design and Access Statement, to reduce carbon emissions from the development and offset the environmental impact of intensification.</i>	Text added
3.7	Reference DCfW updated Design & Access Statements guidance. The DDA now superseded by the Equalities Act.	Reference added to DCfW guidance which includes details on Equalities Act.
3.8	Amend to read: A site analysis, design vision and character analysis of the adjacent townscape must be prepared as part of the DAS.	Text added
3.13	Character and Context. The final sentence states "materials should either match exactly those in the vicinity, or make a marked contrast which compliments". We believe that a slightly different approach should be taken and that the sentence and ethos should read "materials should match exactly those in the vicinity or, if this is not, possible make a marked contrast which compliments them".	Disagree - this approach would limit creative and/ or innovative design response
Responding to Character and Context (after 3.15)	The first photo does not show enough of the surroundings to illustrate how it responds to context	Photo replaced with another example and additional context photos to be added

Paragraph (Consultation Draft)	Comment	Response
Responding to Character and Context (after 3.15)	A more inspirational example of good design should be shown instead of the fourth photo	photo replaced with another example
Responding to Character and Context (after 3.15)	The final photo does not comply with all the principles in the SPG and I suggest Farleigh Road as a contemporary example of coach house redevelopment	photo replaced with example of Farleigh Road
Building Line, after 3.19	Building line illustrations should be more typical of Cardiff and in 3D	Changes made to illustrations
3.25	In line 4, should the word “to” be added for the line to make sense	Text added
3.25	<i>Cycle storage should be referenced.</i>	Text added
3.26	Car parking spaces might not be necessary where infill development is in close proximity to a city car-club space.	The city car-club is a privately run initiative which may not be a reliable enough to preclude car parking spaces.
3.26	Add Where a connection to existing cycle and footway networks is demonstrated?	Disagree - such networks may not be comprehensive enough to encourage cycling as a reliable form of transport
3.28	Fields in Trust (a national organisation concerned with the provision, protection & improvement of land for outdoor sport/play & recreation) welcomes the reference to ‘Open Space, Trees and Landscaping’. Incidental areas of open space in and around residential areas might have a significant play value for local children and reference to the Open Space SPG and consideration given to the value of an open space is welcomed.	no change
3.38	Designing Out Crime, addresses all the needs of South Wales Police.	no change
3.39	The principles of Manual for Streets 2 (DfT, 2010) should also be considered.	Text added
3.40	It states that “both vehicular and cycle parking must not be detrimental to the streetscene, urban vitality or the historic built environment”. Cardiff’s Cycling Officer and Sustrans should be able to provide advice on cycle parking. It would be useful to have examples of the types of cycle parking facilities that are encouraged within Cardiff, such as in conservation areas.	Agree with principle, but no changes made to document as further investigations into cycle parking will need to be undertaken with the officers in Transportation and Conservation.

Paragraph (Consultation Draft)	Comment	Response
3.42	Permitted development rights mean that driveways can be repaved in the future with non-permeable materials	Added in reference to possibility of removing permitted development rights
3.45	Stronger reference should be made to the Parking + Access SPG which includes visitor parking guidelines.	The paragraph already refers to the Parking and Access SPG. Text amended to refer to visitor parking
Gardens and Amenity Space (4.1 onwards)	Can a paragraph be introduced into the document which strengthens the case for public open space and amenity space being designated on site rather than through a section 106 agreement to a nearby parkland or area which is less likely to be used by the new residents on an infill development.	The importance of amenity space is made clear in the document and in some cases it will be appropriate to seek a financial contribution for off site public open space
4.2	Add sentence. <i>This space should be integrated within the design proposals and not just be left over space after planning.</i>	Text added
4.3	States that a garden to a house should measure at least 10.5mdepth/50sqm overall. WAG's Design Quality Requirements (DQR) requires Housing Associations to provide new houses with useable garden space of at least 40qm. This can often be difficult to achieve, when attempting to maximise density on a site to ensure a scheme is financially viable, while also meeting local housing need.	In the document it is made clear that this is an aspiration and applies to family accommodation
4.5	The retention of existing trees should make reference to the appropriate tree protection British Standard "Trees in relation to Construction" B.S. 5837.	This technical detail is covered in the Trees and Development SPG
4.6	Specify that garden sizes to front and rear should be appropriate to the development.	Disagree - this is implicit within the text
4.7	The importance of orientation should be re-emphasised.	Text amended
4.8	To protect privacy and overlooking there should be a presumption against imposing a condition that a window is obscurely glazed /non-opening in order to maintain privacy standards. The Council does not have the resources to police such conditions and they are therefore un-enforceable. The SPG should state that applications where issues of privacy cannot be designed out will usually be refused.	In some circumstances, obscurely glazed glass is a valid method of achieving privacy. Text added to say that glazed windows should not be relied upon.

Paragraph (Consultation Draft)	Comment	Response
4.9	Privacy illustrations should include examples of alternative solutions to privacy other than the 21m rule, as mentioned in the text	Example of Accordia scheme added (Cambridge)
Privacy illustration (4.9)	Privacy illustrations should show windows	Windows added to illustrations
5.2	Conservation area consent is not always needed for demolition in a conservation area	Added that some exclusions can apply
Appendix A	<i>Manual for Streets should be referenced.</i>	Reference made
Appendix A	In the appendix reference should be made more to countryside policy.	Added reference to countryside policy.
Appendix A	Manual for Streets should be referenced as Welsh Assembly Policy	Added reference to Manual for Streets 1 and 2



Document Prepared by
Strategic Planning,
City Development,
Cardiff Council