



26th March 2024

Angharad Hobbs
Planning Department
Vale of Glamorgan Council

By email only

Dear Angharad

**PLANNING APPLICATION 2023/00948/FUL
LAND OFF SANDY LANE, YSTRADOWEN**

I am pleased to enclose a revised application package together with additional supporting information in respect of the above application. This is submitted in response to matters raised during the application process and our meeting of 10th January 2024.

The revised application package comprises of the following revised plans for formal consideration:

Prepared by Hammond Architectural Ltd:

- TP-01 Rev.K - Proposed Site Layout
- PSP-01 Rev.B - Parking Strategy Plan
- EW-01 Rev.F - External Works Layout
- ADP-01 Rev.D - Adoption Plan
- FIRE-01 Rev.B - Fire Strategy Plan
- HF-01 Rev.E - House Finishes Plan
- OSP-01 Rev.D - Open Space Plan
- PV-01 Rev.B - Parking Strategy Plan
- RCS-01 Rev.B - Refuse Collection Strategy Plan
- 2P1BF WDQR House Type
- 4P2B WDQR House Type
- 5P3B WDQR House Type
- Burnaby House Type
- Burnaby Corner House Type
- Hyatt House Type
- Roxbury House Type
- Shelby House Type
- Thornbury House Type

- GAR-01 - Garage
- BSD-01 - Communal Bin Store
- ED-01 - 1800 Screen Wall - Stone
- ED-02 - 1800 Close Boarded Fence
- ED-03 - Timber Gate Detail
- ED-04 - 1200 Ball Top Railings
- SSE-01 Rev.A - Site Sections to Existing
- SS-01 Rev.D - Street Scenes

Prepared by Quad Consult:

- SK101 Rev.15 - Engineering Appraisal
- SK111 Rev.A - Sections Through Site
- 601 Rev.C - SAB Compliance Strategy

Prepared by DPLA:

- 1179.01 Rev.E – Soft Landscaping Proposals

Prepared by Soltys Brewster:

- Preliminary Ecological Appraisal – 3 March 2024
- Stage 2 Ecology Report – 3 March 2024

The following supporting information is also enclosed for the LPA's consideration:

Prepared by Hafod Housing Association as preferred development partner:

- Letter in respect of the affordable housing units.

Overview and Design Evolution

As detailed in the Planning Statement which accompanies the application, the site forms part of a wider LDP dual-allocation for housing (Policy MG2) and open space (Policy MG28), It was envisaged that the wider dual-allocation would deliver a total of 85 dwellings and 0.43ha of open space. A first phase of development on the wider allocation has been previously approved and built-out by Bellway Homes (ref 2014/01483/RES). This delivered a total of 40 dwellings and some open space. There is no evidence in the officer's report for the application of a formal assessment of the open space provision against the allocation under Policy MG28 having been undertaken by the LPA in their analysis of the application, however our calculations indicate that circa 1,587sq.m of POS was provided within this phase of development.

Subsequent to the allocation of the site in the LDP, in January 2019 Schedule 3 of the Flood and Water Management Act 2020 came into force which required new developments above a certain size to secure SuDS Approving Body (SAB) approval prior to their implementation. The implications of this on development schemes varies, however generally it involves at-surface attenuation and requires a greater land-take than traditional systems.

With regard to the application parcel, an initial pre-application enquiry was submitted in respect of the site on behalf of Bellway Homes in 2020. The indicative scheme which accompanied the enquiry proposed the provision of 45 dwellings and approximately 0.165ha of open space (see Fig.1 below). The indicative layout identified a development which backed-on to Sandy Lane, with all vehicular

access proposed via a new priority junction towards to the south-eastern corner of the site. Sandy Lane was proposed to be retained in its current form for the majority of the site frontage and open space was proposed to be provided along the northern boundary of the site.

Fig.1: Bellway Pre-App Scheme – April 2020



Key feedback from the LPA in their pre-application response of 3rd April 2020 included:

- The development should provide equipped children's play space.
- The proposed 0.165ha of open space appeared to represent a shortfall of provision against the requirement of MG28.
- Any Foul Pumping Station (FPS) on the site, if required, should be shown on the proposed plans and should be excluded from any open space calculations.
- An arrangement which proposed houses backing on to Sandy Lane would be unlikely to be supported.
- The proposed access point from Sandy Lane is acceptable however hedgerow loss should be minimised.
- The highways request that Sandy Lane be widened to 5.5m with a 2m footway would result in the loss of the hedgerow on this frontage which would give rise to concern. Instead the footway should be located on the opposite side of the hedgerow to the highway.
- The proposed highway within the site should be shown as extending to the northern parcel in order to provide access to the final parcel of the wider allocation.

In September 2021 a follow-on pre-application enquiry was submitted on behalf of Lewis Homes. The indicative layout which accompanied the enquiry (Fig.2 below) included:

- A development of 46 dwellings.
- Development fronting onto Sandy Lane. This had the knock-on effect of relocating the main estate road and creating a layout which instead backed-on to the open space area at the north of the site.

- The retention of as much of the existing hedgerow to the Sandy Lane Frontage as possible and the delivery of a footpath to Sandy Lane within the confines of the site. This had the knock-on effect of pushing the development area to the north and reducing the available area for SuDS drainage and open space provision.
- The Foul Pumping Station annotated on the plan in response to the request in the April 2020 pre-application enquiry.
- A SuDS drainage basin integrated into an open space area along the northern site boundary in response to SAB requirements, which was proposed to be designed to double-up as accessible and usable open space.

Fig.2: Lewis Homes Initial Pre-App Scheme – September 2021



On 20th November 2021 a pre-application meeting took place which was attended by both the LPA and VOG highways department. Following this meeting the layout was further developed in response to the feedback received, including:

- The widening of Sandy Lane to provide a 5.5m wide carriageway and 2m footway, with the properties fronting Sandy Lane accessed directly from Sandy Lane. This resulted in the development being pushed further back into the site.
- The removal of the hedgerow to Sandy Lane to accommodate the widened highway and its translocation within the site, further reducing the land available for SuDS drainage and open space.
- The segregation of the drainage attenuation pond and the open space provision, and the provision of a dedicated open space area centrally within the site.
- The re-siting of units to provide a better termination of vistas, and a better relationship/surveillance of the open space areas.
- The extension of the highway to the northern boundary of the site to serve the future development parcel to the north.

This revised scheme (Fig.3 overleaf) was issued to the LPA for inclusion in their final written comments.

Fig.3: Lewis Homes Scheme follow-up Pre-App Scheme - November 2021



A written pre-app response was received from the LPA on 23rd March 2022. Key feedback within this included:

- The scheme should provide 1,527.28sq.m of open space, including a LAP of at least 100sq.m.
- The views into the site from Sandy Lane are important.
- Landscaping within the site should include trees.
- Differentiation of surfacing materials to create character.
- Dual aspect/dual-frontage dwellings on junctions
- Units 14-18 should front open space.

In September 2023 a Full Planning Application was submitted for the site. By this stage the scheme had been further evolved in response to the latest pre-application comments (see Fig.4 below), and included:

- An increase in the size of the central open space area, with the result of the loss of one unit.
- The introduction of a LAP into the central open space.
- The reorientation of units 15-18 to provide an improved relationship between the units and the adjacent open space, as well as maximise the available open space area in this location. This included the introduction of dual-aspect units to maximise natural surveillance (it was not possible to reorientate these units to front the POS due to topographical constraints as explained in the accompanying Planning Statement).
- The slight realignment of the primary estate road at the site entrance and the associated repositioning of the dwellings in this location to provide an appealing entrance vista.
- A landscaping scheme including tree planting in key locations.
- The use of the hedgerow translocated from the Sandy Lane frontage to enclose the open space areas.
- A viability statement to evidence that the scheme struck an appropriate balance in respect of delivering a viable housing development, open space provision and other S106 requirements.

Fig.4: Planning Application Submission – September 2023



The latest scheme hereby enclosed (Fig.5 below) therefore represents a cumulation of an iterative process of evolution undertaken collaboratively between the applicant and the LPA/consultees. There follows a summary of the matters raised, and the design team's response to these.

Fig.5: Final scheme – March 2024



Public Open Space

Local Area of Play

The Local Area of Play was originally designed as a traditional, enclosed space however in response to the suggestion of the Local Planning Authority this has been redesigned to provide a more informal, natural play space. This allows for an increase in the overall usable open space area, reduces the topographical challenges, and provides a better relationship between the highway and play space. The natural play space will include green features such as logs and mounds that will be integrated into the POS to create a homogenous, usable space.

Relocation of Hedgerow

In response to the LPA's comments that the translocated hedgerow to the front of Plot 22 served as a barrier to the integration of this plot and the POS, the translocated hedgerow has been relocated adjacent to plot 14, and the defensible space to the front of Plot 22 replaced by railings. This provides a better interrelationship between Plot 22 and the POS area, including improved natural surveillance of the POS. The related hedgerow also serves to better frame the POS area adjacent to Plot 14. Railings have been placed in front of Plot 22 to replace the translocated hedge.

Levels

It was agreed that section plans would be produced to showcase the public open spaces' usability. The section plans produced by Quad Consult are enclosed and evidence that the topography of the open space areas has been carefully considered to ensure that it is accessible and usable.

Footpath

It was agreed that formal highway footpath to the northern adjacent to the main POS area would be replaced by a more informal footpath, in order to improve the quality of the POS area and reduce the amount of hardstanding. This is reflected on the enclosed plans.

Foul Pumping Station and Electricity Substation

Whilst not explicitly raised as concerns as part of the application process, through further detailed design work it has been possible to omit these from the development, freeing up additional land for open space provision and improving the overall quality of the space.

Increased Shared Surfacing

The internal highway that connects the site to Sandy Lane was originally designed with a short section to the north allocated for shared surfacing. It was agreed during the meeting that the extent of shared surface could be increased which would decrease the overall area of hard-surfacing and help improve the open space provision as well as minimise surface water attenuation requirements. The enclosed plans reflect this agreement.

Affordable Housing

Housing Mix

Comments received from the Housing Strategy Coordinator in regard to the mix of housing that was submitted with the planning application (reference 2023/00948/FUL) highlighted the need for a housing mix of; 8 no. 1-bedroom, 4 no. 2-bedroom, and 2 no. 3-bedroom social rented units, and 5 no. 2-bedroom assisted home ownership houses. These requirements have been implemented into

the revised site layout. This satisfies the requirements set out by the Housing Strategy Coordinator to achieve the desired affordable housing mix.

Clustering

It was suggested as part of the LPA's assessment of the application that some of the affordable units should be relocated in order to avoid the clustering of affordable units. This is considered unnecessary on the basis that the affordable units are a mix of LCHO and social-rent; that the number of affordable units would be so low that the issues associated with clustering on larger schemes would not be experienced here; and that whilst the units are physically in close proximity, the layout is such that the affordable units would not be experienced as one within the development. The enclosed letter from Hafod Housing Association, Lewis Homes' preferred development partner, also confirms their preference for the affordable units not to be further isolated from each other within the development. It should further be noted that the pepper-potting of affordable units would further detract from the scheme viability.

External Amenity Areas

The size of the external amenity space on some of the affordable units was queried. It is contended however that the external amenity areas all exceed minimum WDQR standards and are acceptable to Hafod Housing Association (see enclosed letter).

Design and Amenity

Materials Palette

The original design for house types incorporated a mix of white render with red brick. Comments were received from the Local Planning Authority that would only support a development that includes all dwellings to be finished in white render (or weather boarding) and charcoal roof tiling. On the back of these comments, the materials palette has been changed as to satisfy the desire of the Local Authority. This is reflected in the House Finishes Layout and Housetype Plans.

Overlooking Distances

Overlooking distances toward existing residential units were queried by the Local Planning Authority. Further evidence of distances were requested to ensure that appropriate consideration has been given to all existing residents. Plans are enclosed to evidence these.

Highways

Junction Radii

Concerns regarding access into the site were raised through both the Pre-Application Consultation and statutory internal consultation when the planning application was submitted. An improved junction radii has been implemented with a radii of 7.5m as required within the Vale of Glamorgan. This has been achieved through adjustments to the housing layout to the southwest of the site. The Highways Officer's suggestion of a TRO at the site entrance to prevent parking is acceptable to Lewis Homes.

Parking

The comments raised by the Highways Officer in regard to reducing the tandem bay parking from 3 no. to 2 no. has been welcomed and accepted. This is reflected in the updated site layout plan. Additionally, visitor parking was discussed during the meeting, and it was accepted that appropriate

parking locations for visitor parking could be achieved on the highway. This has been illustrated in the 'parking strategy' plan. The proposed development now has a total of 84 no. residential parking spaces, with a further 7 no. indicative visitor parking spaces on the highway.

Summary and Conclusions

The application is supported by a comprehensive Planning Statement which includes a detailed viability statement which evidences that the viability of the site is challenging and that the current scheme is only deliverable on the basis that Lewis Homes' are prepared to accept less than the generally accepted minimum profit levels for a residential development. Notwithstanding this, Lewis Homes have worked extremely hard, and in close collaboration with the local authority, in order to ensure that they deliver a high-quality scheme that meets all technical requirements, is of an excellent design standard, would provide a policy compliant suite of planning obligations, and is otherwise fully in compliance with the development plan. We would be grateful therefore if you could proceed to determine the application on the basis of the enclosed plans as soon as practicable.

Yours sincerely

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Jon Wilks
Director