

Our ref: 210409_L_JPW1454_DW_FPP_v0

Park House
Greyfriars Road
Cardiff
CF10 3AF
T +44 2920 668 662

Date: 9 April 2021

Development Management
Cardiff Council
County Hall
Cardiff
CF10 4UW

Dear Sir or Madam,

On behalf of AmZac Estates Ltd

Full planning application for rear, side and roof extensions and ancillary development at 119 Romilly Road, Cardiff CF5 1FN

Regarding the above and following pre-application discussions (reference: PA/19/00131/MNR), please find enclosed the following information:

- Application form and certificates completed and signed;
- Site Location Plan (drawing reference: 19-047-1);
- Existing Plans & Elevations (drawing reference: 19-047-2); and
- Proposed Plans & Elevations (drawing reference: 19-047-3).

As an application for the enlargement, improvement or alteration of two or more dwellinghouses, payment of the appropriate fee of £460 will be made.

A description of the site, its planning history, the proposed development, the planning policy context, the key planning considerations and a summary and conclusion is provided below.

We trust the enclosed enables the application to be determined positively. However, should you have any questions or wish to discuss anything please do not hesitate to contact me.

Site description

The site is approximately 2 km west of Cardiff City Centre, 500 m north west of Cowbridge Road East District Centre, in the Canton neighbourhood, at the south east corner of the 4-arm junction of Romilly Road with Romilly Road West and Clive Road.

To the north of the site lies the junction of Romilly Road with Clive Road with several mature trees located within the verges beyond. To the east adjoins the mid-terrace 3-storey residential property 117 Romilly Road with the semi-detached 3-storey residential property 115 Romilly Road positioned beyond. Beyond these to the east lies the eastern arm of Romilly Road with 2 and 3-storey residential properties beyond. To the south of the site lies 92 Clive Road, a 2-storey end-of-terrace residential property. To the west lies Clive Road with terraced residential properties beyond.

119 Romilly Road is a 3-storey, pitched tile roof, semi-detached building with an existing full width flush apex dormer situated on the front elevation (see Figure 1 below). The north ('front') elevation is finished in brick, painted render and timber.

Figure 1: 119 Romilly Road north ('front') elevation



The south ('rear') and west ('side') elevations are finished in render (see Figure 2 below). The south elevation of the main building also contains a flush apex dormer.

Figure 2: 119 Romilly Road south ('rear') and west ('side') elevations



The site is enclosed by a low roughcast blockwork wall to the north and a brickwork wall to the west, which is supplemented by a close boarded timber fence above nearer the southern boundary.

A small external area surfaced in hardstanding exists to the west of the annex. To the south of the building, enclosed by boundary walls, fencing and a gate, lies a parking court for up to 5 cars.

Access to the site for pedestrians is available from the footways to the north and west leading to the two building entrances. Vehicular access is via Clive Road to the west leading to the parking court.

Internally, drawing Existing Plans & Elevations (reference: 19-047-2) shows the building is divided into 5 apartments, 2 each on the ground and first floors and a single apartment on the third floor. A schedule of the existing accommodation is set out in Table 1 below.

Table 1: 119 Romilly Road apartments – schedule of accommodation

119 Romilly Road apartments – schedule of accommodation		
Apartment Number	Type	Existing GIA (m ²)
Flat 1	1-bedroom	26.3
Flat 2	Studio	20.1
Flat 3	1-bedroom	29.5
Flat 4	Studio	16.1
Flat 5	1-bedroom	33.7

Table note: All areas approximate

Open space is available nearby at Thompson’s Park, 120 m to the north east, and Victoria Park, 300 m to the west.

Planning history

A summary of the relevant planning history at the site is provided in chronological order below.

On 2 July 2004 a Certificate of Lawfulness (reference: 04/01062/W) was granted for ‘Use of 5 Flats’ at the site.

On 2 June 2014 pre-application advice was provided (reference: PA/14/00115/DCO) regarding a proposed 2-storey dwelling within the rear curtilage of the site. The Local Planning Authority (LPA) advised it had concerns regarding ‘overdevelopment’ of the site.

On 21 April 2015 planning permission was refused (reference: 15/00446/DCH) for a single storey pitched roof double garage extending from the southern gable end 119 Romilly Road along its boundary with 117 Romilly Road. The reasons for refusal were:

1. The proposed garage would result in a substandard amount of useable private amenity space for the occupiers of 119 Romilly Road; and
2. The proposed garage by virtue of its height and length within close proximity to the boundary with 117 Romilly Road, would result in an unneighbourly and overbearing form of development which would prejudice the amenities of the occupiers of 117 Romilly Road.

On 7 October 2015 planning permission was refused (reference: 15/01974/DCH) for a further planning application for proposed garages for the following reasons:

1. The proposed garage by virtue of its height and length within close proximity to the boundary with 117 Romilly Road, would result in an unneighbourly and overbearing form of development which would prejudice the amenities of the occupiers of 117 Romilly Road; and
2. The proposed garage would result in a substandard amount of useable private amenity space for the occupiers of 119 Romilly Road.

On 26 May 2016 an appeal against the refusal of the above planning application was dismissed (reference: APP/Z6815/A/15/3139003). The Inspector concluded that the proposed off-street garage parking would harm the living conditions of the occupiers of the flats having regard to the provision of amenity space.

In late 2020, pre-application advice (reference: PA/19/00131/MNR) was sought for the proposed rear, side and roof extension of the property, which is now the subject of this planning application. Advice was provided via email on 18 September and 27 November 2020.

Proposed development

The applicant acknowledges that existing Flats 2 and 4 at 119 Romilly Road as set out in Table 1 above, in particular, are below the relevant space standards set out within the LPA's Flat Conversions Supplementary Planning Guidance ('Flat Conversions SPG'), adopted in March 2019.

There is an opportunity to extend the property's southern annex to the south by 1.5 m (increased from 1 m in the pre-application submission), the west by 2 m and its roof via an apex dormer to enable Flats 2 and 4 to be enlarged and brought into alignment with the space standards set out in the Flat Conversions SPG, as advised during pre-application. A schedule of the proposed accommodation is set out in Table 2.

Table 2: 119 Romilly Road apartments – proposed schedule of accommodation

119 Romilly Road Apartments – Proposed Schedule of Accommodation				
Apartment Number	Type	Existing GIA (m ²)	Proposed Type	Proposed GIA (m ²)
Flat 1	1-bedroom	26.3	No change	No change
Flat 2	Studio	20.1	1-bedroom	36.0 (+15.9)
Flat 3	1-bedroom	29.5	No change	No change
Flat 4	Studio	16.1	No change	31.6 (+15.5)
Flat 5	1-bedroom	33.7	No change	No change

All areas approximate

The proposals include a change in the number and position of windows in the west ('side') elevation of the building, increasing from 4 to 5, providing additional natural light to Flats 1, 2, 3 and 4 together with improved surveillance of the public realm.

Access to Flat 2 will be relocated from the west elevation to the south.

In addition, a dedicated area for bin and cycle storage is introduced where car parking is currently, with room for parking up to 2 cars retained.

Drawing Proposed Plans & Elevations (reference: 19-047-3) illustrates the proposed development.

Planning policy context

Relevant Development Plan policies and material considerations are summarised below.

Development plan policy

The Development Plan for the site is the Cardiff Local Development Plan, adopted January 2016 ('LDP') and Future Wales The National Plan 2040, published February 2021 ('NP').

LDP Policy KP5 (Good Quality and Sustainable Design) states to help support the development of Cardiff as a world-class European Capital City, all new development will be required to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces by (inter alia):

- (i.) Responding to the local character and context of the built and landscape setting so that layout, scale, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage are all addressed within development proposals;
- (ii.) Providing legible development which is easy to get around and which ensures a sense of continuity and enclosure;
- (viii.) Achieving an adaptable design that can respond to future social, economic, technological and environmental requirements;

- (ix.) Promoting the efficient use of land, developing at highest practicable densities and where appropriate achieving the remediation of land contamination;
- (x.) Ensuring no undue effect on the amenity of neighbouring occupiers and connecting positively to surrounding communities; and
- (xi.) Fostering inclusive design, ensuring buildings, streets and spaces are accessible to all users and is adaptable to future changes in lifestyle.

LDP Policy H5 (Sub-Division or Conversion of Residential Properties) states proposals for any conversion to flats or Houses in Multiple Occupation will be permitted where:

1. The property is of a size whereby the layout, room sizes, range of facilities and external amenity space of the resulting property would ensure an adequate standard of residential amenity for future occupiers.
2. There would be no material harm to the amenity of existing, nearby residents by virtue of general disturbance, noise or overlooking.
3. The cumulative impact of such conversions will not adversely affect the amenity and/or the character of the area.
4. Does not have an adverse effect on local parking provision.

Future Wales The National Plan 2040, February 2021

The NP Policy 1 and Policy 33 identify Cardiff as a National Growth area.

Flat Conversions Supplementary Planning Guidance, adopted March 2019

Table 3: Flat Conversions Supplementary Planning Guidance space standards

Number of Bedrooms	Minimum Flat Size in GIA
Studio Flat	30m ²
1 Bedroom	35 m ²
2 Bedroom	45 m ²
3 Bedroom	55 m ²
4 Bedroom	65 m ²

The Flat Conversions SPG paragraph 4.4.2 states:

“... ground floor (or roof terrace) amenity space for flat conversions is different to amenity space for C3 dwellings or for HMOs, as it is less likely that upper floor residents would have direct access to any ground floor amenity space in converted flats. The council would favour developments that make every effort to provide access to external amenity space to as many dwellings as possible within the converted building. However, it is recognised that this may not always be viable, or desirable, and that a range of flats, some with sole access to amenity space, some with shared access and some with no access, is a matter for individual residents in choosing where to live. Amongst other considerations, a family dwelling on the ground floor with sole access to the amenity space can on balance be more beneficial than the same space being accessed by all flats within the building.”
(our emphasis).

Cardiff Residential Extensions and Alterations Supplementary Planning Guidance, adopted November 2017

Cardiff Residential Extensions and Alterations Supplementary Planning Guidance, Adopted November 2017, ('Extensions and Alterations SPG') sets out the design standards and principles in relation to extensions and alterations of residential properties.

Paragraphs 7.18 to 7.20 state that extensions to corner plots should avoid a 'tunnel' effect and that any extension should adhere to the building line along both of the streets to which it relates. Corner plots and plots located at junctions are likely to have more than one established building line, each of which should be respected. In most cases there will be two building lines, one to the road facing the property, and one to the side.

Paragraph 7.27 states extensions should avoid overbearing design which can result in overlooking and an unacceptable loss of daylight. It states 2-storey extensions if appropriate should be subservient to the main dwelling and be limited in depth, width and height so as to avoid an overbearing appearance, significant overshadowing and loss of privacy.

Paragraphs 7.24 and 7.25 state that the scale and form of an extension must be in keeping with, and subservient to, the existing building and its setting. Siting is likely to be influenced by a number of factors, including the space available around the building and the prominence and appearance of the extension to the street scene. Extensions should not result in adverse loss of privacy to neighbours or occupants. Windows in an extension must therefore be positioned carefully and should not overlook neighbours' property or garden.

Paragraphs 7.54 and 7.55 state that the roof of an extension should match the main roof in terms of style, form, pitch and materials to ensure that the extension appears to be part of the original house. The ridge height of any extension should usually be lower than the original roof to emphasise the distinction between the original dwelling and its addition, and to ensure the subservience of the addition.

Paragraph 7.67 states the architectural detailing on the existing property should be repeated, where appropriate, on any extension. The size, positioning, style and materials of new windows and doors should generally match those on the existing dwelling in order to achieve a consistent appearance.

Paragraph 7.78 states that where there is inadequate headroom within an existing roof space, it may be possible to create additional space through the insertion of dormer windows. Dormers should normally be positioned on the least prominent elevation, usually the rear. The design of dormer windows should be considered carefully, as they can have a significant impact on the character and appearance of a house and its surrounding area. Dormer windows should:

- Relate well to the dwelling on which they are positioned/located;
- Relate well to the context of the street or immediate surroundings;
- Be avoided on the front elevation of a dwelling, unless they are a local feature;
- Be appropriately scaled in order that they appear subservient to the existing roof;
- Be set up from the external wall, down from the ridge and in from either side by an appropriate distance;
- Be finished in materials which reflect or complement the main dwelling;
- Respect any symmetry evident within the existing dwelling; and
- Positioned to minimise impact upon neighbouring amenity.

Paragraph 7.80 states the scale of a dormer window should be appropriate to the roof upon which it is located. To achieve this, dormers should be set in from either side of the roof, set down from the ridge and set up from the external wall. It is important that dormers appear well proportioned and therefore subservient to a roof.

Managing Transportation Impacts (Incorporating Parking Standards) Supplementary Planning Guidance, July 2018

The Managing Transportation Impacts (Incorporating Parking Standards) Supplementary Planning Guidance ('Transportation SPG'), adopted July 2018 paragraph 6.2 sets out **maximum** parking standards (with the exception of disabled persons' parking which are minimum standards) for residential dwellinghouses. It also sets out minimum cycle parking standards. This is spatially distinguished between 'central' and 'non-central' areas. The site lies within the central area. The relevant standards are set out in Table below.

Table 4: Managing Transportation Impacts (Incorporating Parking Standards) Supplementary Planning Guidance Extract

C3 and C4 Dwelling properties				
Area	Development type	Maximum car parking spaces per unit	Minimum cycle parking	Disabled parking provision
Central	All dwellings	1 per unit	1 per bedroom	Provided in car parking allocation

Key planning considerations

Having regard to the above, it is important to note the change in the policy context from when previous planning applications and an appeal were considered at the site. Since those decisions were made, a significant material change has occurred in that the LPA adopted a new Flat Conversions SPG flat in March 2019. This Flat Conversions SPG introduces minimum internal space standards for flats and recognises that access to and provision of external amenity space, including no access, is a matter for individual residents in choosing where to live.

Space standards

The proposals will significantly improve the internal space standards of 2 existing flats, exceeding the standards set out in the Flat Conversions SPG and resulting in a higher standard of residential accommodation for occupants. This is a significant material consideration weighing in favour of planning permission being granted.

Amenity space

It is noted that in the pre-application advice dated 18 September 2020 that it was stated that two new flat units are being created. However, this is incorrect. No new units are being created. There are 5 existing flats and the only material changes are a studio being converted to 1 bedroom and another studio being increased in size.

Regarding amenity space and the provision of cycle parking and bin storage, however, the proposed extension would result in improvements through car parking being reduced and dedicated space for bin and cycle storage being introduced.

As stated in the Flat Conversions SPG paragraph 4.4.2, amenity space is considered to be a matter for individual residents in choosing where to live. The provision of amenity space, cycle and bin storage within the proposals is therefore considered to be in accordance with guidance.

Design and amenity

It should be noted that the property is not Listed nor within a Conservation Area. The design of the proposed extensions is considered appropriate to the building, site and its context and will not result in any significant harm to amenity or privacy for neighbours or the street scene.

As shown in Figures 1 and 2 above, the character of the existing property is one of larger flush fronted apex dormers. The proposed roof extension is therefore 'in keeping' with the character of the property. Furthermore, this is considered the optimal arrangement to ensure a high standard of internal living accommodation for occupants of Flat 4 in ensuring that sufficient internal area with headroom of over 1.5 m is provided as requested in the advice dated 18 September 2020.

It is noted in the pre-application advice dated 27 November 2020 that it was considered that a 'single large dormer would be unlikely to receive a favourable consideration as it is a large bulky design which has a top heavy appearance to the rear annex'. However, as set out above, the existing character of the property is larger flush fronted apex dormers. Therefore, the proposal in this regard is therefore 'in keeping' with the property's character.

Larger apex flush front dormers are also a notable feature of the area as shown in in Figures 3, 4 and 5 below.

Figure 3: Romilly Road



Figure 4: Romilly Road



Figure 5: Romilly Road



However, the advice has been noted and therefore the dormer has been set down from the ridge of the annex and inwards from the sides of the roof to ensure it is subservient to the annex roof. This complies with the guidance set out within Extensions and Alterations SPG paragraph 7.80 with the exception of being set up from the external wall, which as noted above would conflict with the character of the property and its context. Furthermore, as shown in Figure 6 below, the recessive dark coloured tiles and use of large areas of glazing reduce the massing and 'weight' of the extension and add character and interest to the street scene, as well as providing a high standard of internal living accommodation for the occupants. On balance, therefore, the proposed design can be considered acceptable.

Figure 6: Artist's impression



Regarding amenity and privacy, existing habitable room windows are present within the western elevation of the property. Furthermore, public highway is situated between the site and properties on the western side of Clive Road. Therefore no significant reduction in amenity or privacy will result from the repositioning and addition of one further window. Regarding 117 Romilly Road, it is unclear whether its ground floor south facing rear annex window is the single aspect to the room that it serves or not. However, the proposed southern extension does not project beyond a 45 degree angle from the centre of the window, preserving amenity in accordance with the Extensions and Alterations SPG.

Parking

No additional units are being proposed therefore, technically, no additional provision of any type of parking is required. However, space for up to 4 cycle spaces to be stored externally is indicated on the drawing Proposed Plans & Elevations (reference: 19-047-3), which is in addition to internal storage of cycles

Our ref: 210409_L_JPW1454_DW_FPP_v0

available. As no more than the maximum level of car parking is proposed, the application can be considered to be in accordance with the Transportation SPG.

Summary and conclusions

The applicant acknowledges that existing Flats 2 and 4 at 119 Romilly Road as set out in Table 1 above are below the relevant space standards set out within the Flat Conversions SPG, adopted by Cardiff Council in March 2019.

There is an opportunity to extend the property to significantly improve the space standards of Flat 2 and Flat 4 through extending the property into the existing car parking court.

Furthermore, it is considered that the proposed extensions and alterations to the building are appropriate to the site and its setting and can be accommodated without significant harm to neighbours' amenity or the street scene.

In conclusion, it is considered that the proposals can be supported in planning terms and the overall planning balance weighs firmly in favour of planning permission being granted.

I trust that this provides enough information to the planning application to be determined promptly and positively. However, if you have any questions or need anything further please do not hesitate to contact me.

Yours faithfully,
for RPS Consulting Services Ltd



Dafydd Williams

Associate

dafydd.williams@rpsgroup.com

cc: Mr M Johnson, Amzac Estates Ltd
Enc: As above