

Cardiff Infill Sites

Supplementary Planning Guidance

Appendix 2



November 2017

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1. Introduction

- 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.
 - Site redevelopment (where the replacement of an existing building is proposed).
- 1.2 Welsh Government support the use of SPG to set out detailed guidance on the way in which development plan policies will be applied in particular circumstances or areas. SPG must be consistent with development plan policies and national planning policy guidance. SPG helps to ensure certain policies and proposals are better understood and applied more effectively. They do not have the same status as the adopted development plan but are a material consideration in the determination of planning applications.
- 1.3 In general terms this type of development is normally small-scale (10 units or less), but there may be exceptions for development proposals of higher numbers of units (10 - 25), where the guidance contained in this document will apply. Development proposals for 10+ units should also consider the guidance contained in the Cardiff Residential Design Guide SPG. A design and Access Statement will be required for such proposals.
- 1.4 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.
- 1.5 This SPG is written in the broader context of sustainable development outlined in Welsh Government's Planning Policy Wales and TAN 12: Design. Welsh Government endorses Manual for Streets and Manual for Streets 2 principles. These should be applied in infill development.
- 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 This guidance is primarily supplementary to Policy KP5 (Good Quality and Sustainable Design) of the Adopted Cardiff Local Development Plan (2006 - 2026), although other development plan policies may also be relevant.
- 1.8 Contributions will be sought on developments containing 5 or more dwellings or on sites exceeding 0.1 hectares. Refer to policy H3: Affordable Housing, of the Local Development Plan and the Planning Obligations SPG for further details.
- 1.9 Further planning guidance is available at www.cardiff.gov.uk/planning
- 1.10 Further details regarding legislation, guidance and development plan policies can be found in Appendix A.

2. Definitions and design approach for infill

2.1 Infill development commonly consists of three main types:

- Gap site development within a street frontage (p.5).
- Backland development (p.7).
- Site redevelopment (p.9).

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 increases 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. 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 context.

Examples of gap sites with street frontages



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.

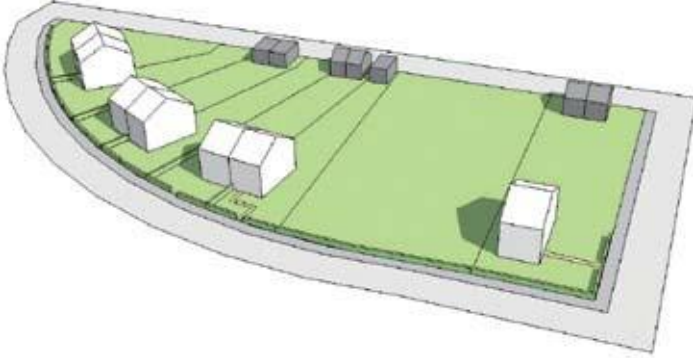
Boundary treatment

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

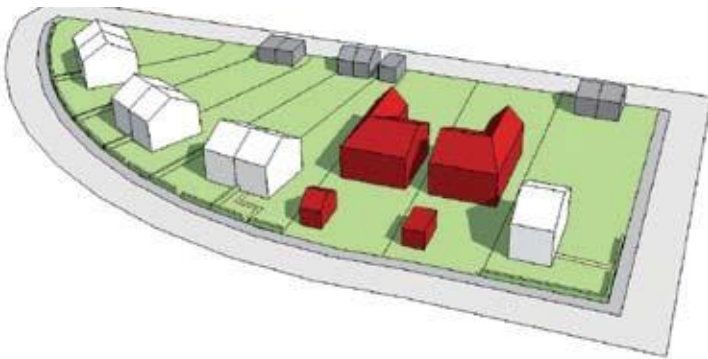
Parking

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

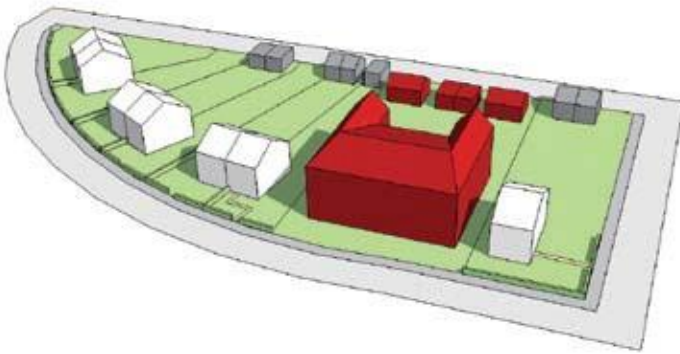


Gap site prior to development



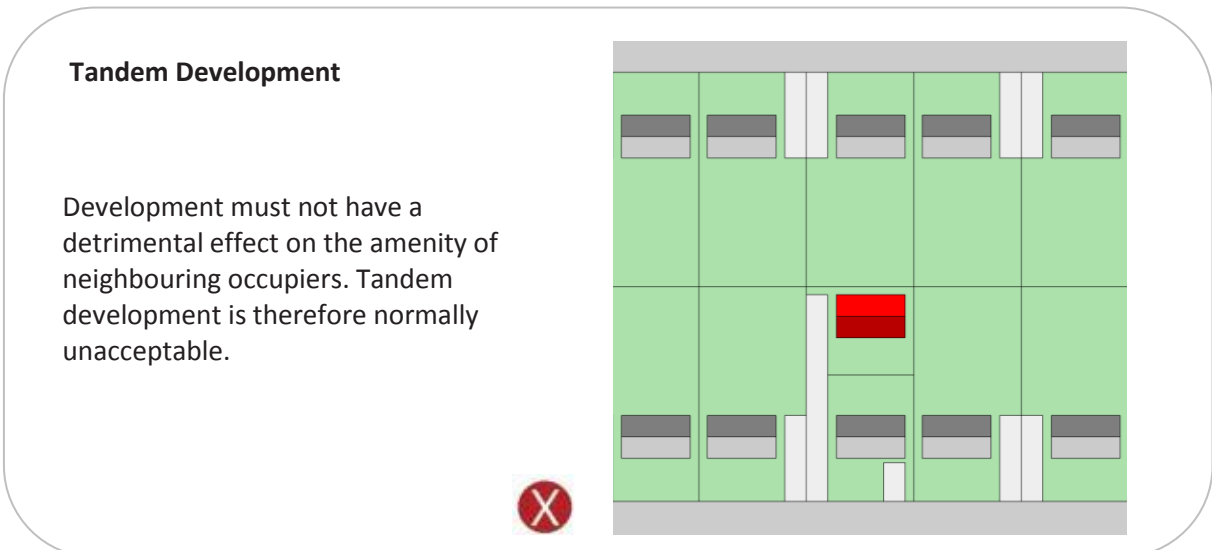
These two examples fail to respond to the existing character of the surroundings which comprise of:

- 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 (including rear lanes)

- 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. Development proposals accessed primarily by rear lanes are unlikely to be supported unless it can be demonstrated that the pedestrian access arrangement (street lighting, highway safety and surveillance) and living conditions (light, outlook, overlooking and quality of amenity space) would be acceptable.
- 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 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 'inactive' frontages or rear lanes.
- 2.10 Backland sites may have a considerable number of 'inactive' frontages surrounding the site boundary (i.e. fences or walls) which will need to be taken account of in the design. Layouts 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.
- 2.11 **Tandem** development is a form of backland development where one new house is placed directly behind another either sharing the same, or an additional driveway/access. This form of development is generally unacceptable because of the consequential impact on the residential amenity of the surrounding dwellings. Where plots are of a sufficiently large size, proposals which are sensitively designed to limit their impact upon neighbouring properties may be considered.



Backland example



This backland development comprises of land to the rear of the main house. It is considered 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

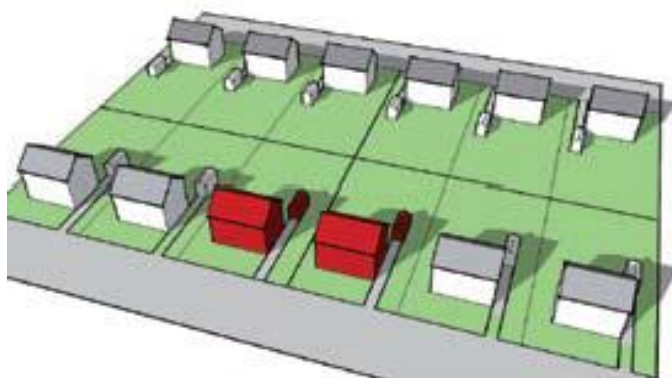
A parking court has been integrated behind the garage as part of the design of the development. The garage itself is not overly dominating in the street due to the choice of matching materials.

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 / corner sites

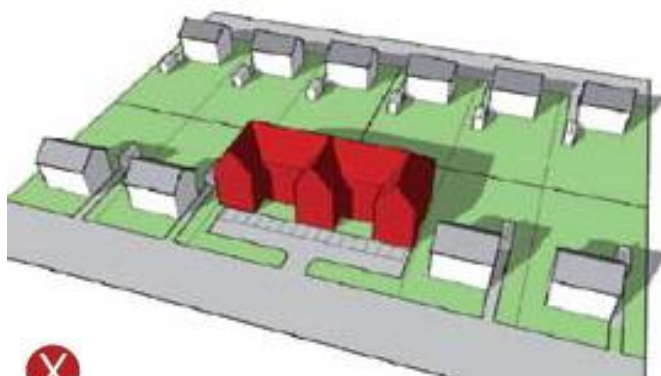
- 2.12 Site redevelopment may involve the redevelopment of any type of building, but proposals to redevelop dwellings by replacing original houses with larger ones, dividing large plots into two smaller ones and redeveloping single/multi dwelling plots for flats are becoming increasingly common.
- 2.13 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 building line and be of a design which complements the existing street scene.
- 2.14 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.
- 2.15 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.

Poor redevelopment example



Before

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



After

Unacceptable redevelopment that fails to respond to the urban grain and existing character of the area.

Parking should also not dominate the frontage.



Redevelopment example – corner site

Before



This development maintains appropriate space between dwellings and is of appropriate scale and massing on the corner site.

The building is set back into the plot to respond to the character of the area.

Materials and detailing respond to local context; reinterpreting the Edwardian character found on Penylan Road in a contemporary style. This is evident in roof materials, deep eaves and steep pitch, use of natural stone combined with stone coloured render, projecting bay windows and vertically emphasised fenestration with narrow framing.

After



3. Objectives of good design

- 3.1 Good designs should embrace established principles of sustainable design and development and make a positive contribution to the creation of distinctive communities, places and spaces.
- 3.2 Infill development requires special attention be paid to context, the spatial characteristics of an existing street scene, and the building's relationship with space. The following design objectives should be used as guidelines for achieving good design. The objectives should be considered in conjunction with the appropriate information contained in the *Cardiff Residential Design Guide SPG*.

Sustainable buildings

- 3.3 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 order to reduce carbon emissions from the development and offset the environmental impact of intensification.
- 3.4 Opportunities for compatible mixed use developments in appropriate locations can help to create sustainable communities and are supported by the Welsh Government (TAN 12 and 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

- 3.5 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

- 3.6 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, and there should be no barriers that create undue effort and separation. Further advice on this can be found in TAN 12: Design para. 5.3 and Inclusive Mobility (Department for Transport, 2002).

Character and context

- 3.7 As an overarching guide for all residential development, the *Residential Design Guide* SPG 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.
- 3.8 Infill development needs to be sensitive to its 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 treatments (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 and character of the area needs to be gained and responded to.
- 3.9 Boundary treatments, including the means through which pedestrians/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 'inactive' 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.
- 3.10 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.
- 3.11 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.
- 3.12 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.
- 3.13 The fenestration of new developments should complement the size, proportions, design and rhythm of detailing of neighbouring properties. The roofline should include appropriate design and pitch of roofs, ridge height, eaves level, and notice taken of any other relevant details in the street scene.

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.

Situated on the edge of Pontcanna Fields and Llandaff Fields Historic Park and Garden, it has successfully responded to elements of the Victorian terraces from the wider area and pays close 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



This 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. The use of large contrasting bay windows is not entirely successful, 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. Larger windows would have further improved the aesthetic.

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, however this building quietly integrates well into the existing character. The 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

- 3.14 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.
- 3.15 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.
- 3.16 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.
- 3.17 The prevailing depth of frontage should be maintained where it is a feature of the area that contributes to the character and distinctive appearance of the street.

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



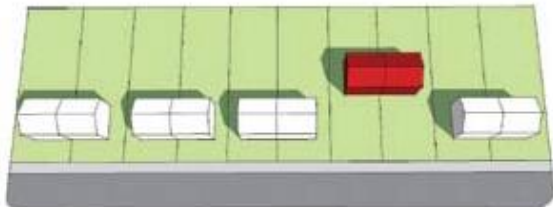
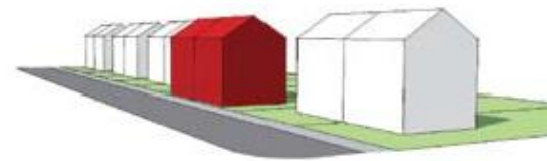
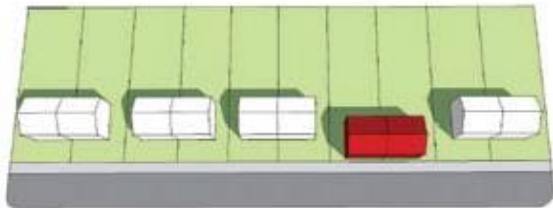
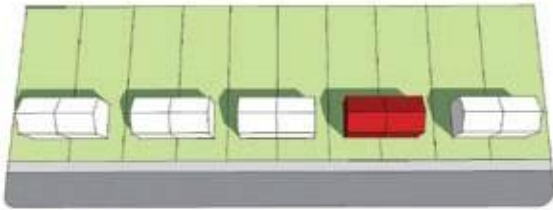
The modern infill building sits well in the corner site, allowing separation space between the historic terraces and the infill.

The buildingline is consistent and the building projects back into the site to an appropriate distance.

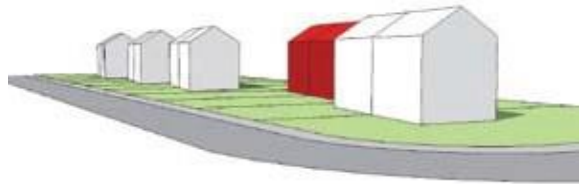
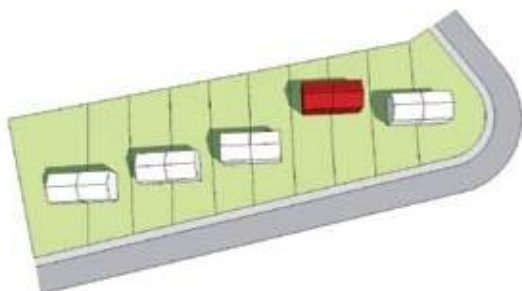
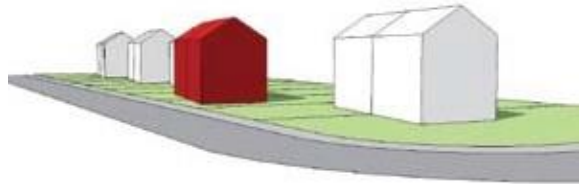
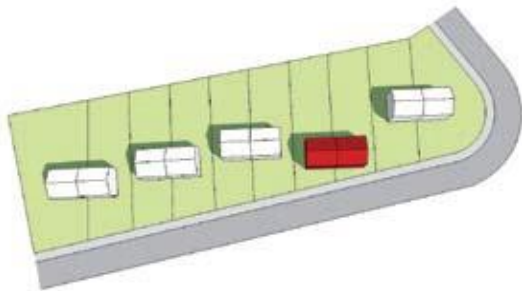
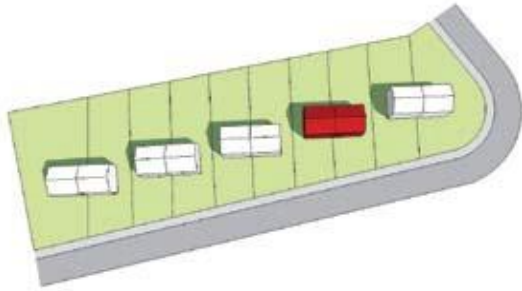
Building lines

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

Straight building line



Stepped building line



Height, scale and massing

- 3.18 Infill development should take account of and respond to existing building heights (number of storeys and floor to ceiling heights), scale and massing of buildings in the street.
- 3.19 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.
- 3.20 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.



This contemporary redevelopment of a former garage site comprises of three-storey terraced housing.

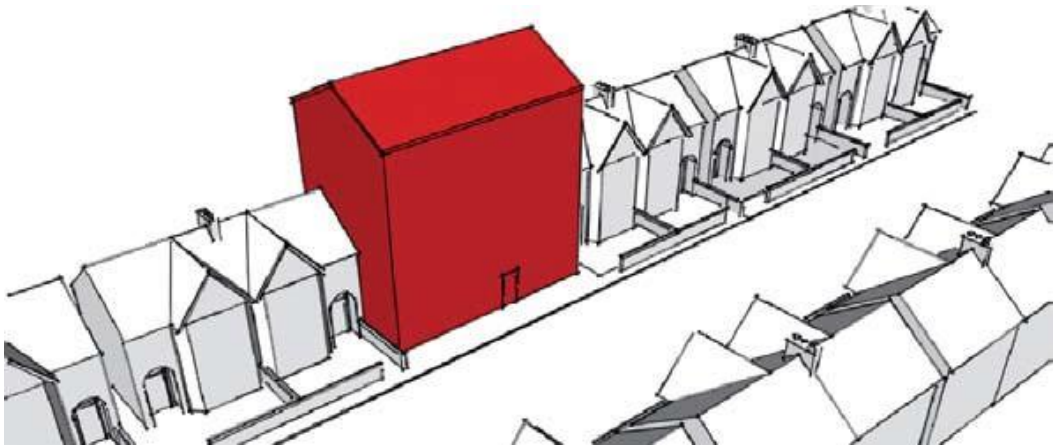
The height, scale and massing is appropriate for the site context, which consists of a substantial corner plot, a variety of existing building types, heights and characters, situated along a primary vehicular route with a wide carriageway.



The increase in height between the existing two-storey 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 than the two storey housing opposite.



Scale



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

Density

- 3.21 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 Development Plan, Policy KP5. 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.
- 3.22 The appropriate development capacity of a site 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 need to protect privacy and amenity.
 - The retention and/or provision of adequate garden space and parking provision.
 - Proximity to public transport.
- 3.23 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.
- 3.24 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.

- 3.25 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 SPG¹.

Open space, trees, biodiversity and landscaping

- 3.26 Applications for development on areas which involve the loss of green or open space will be assessed against the following factors outlined in the Green Infrastructure SPG (2017):
- Existing local provision of open space.
 - The functional or amenity value of the open space.
 - The quality of the open space.
 - Any significant nature or historic conservation importance of open space which may be lost.
 - Any compensatory provision for loss of open space.
- 3.27 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.
- 3.28 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. Applicants should refer to the Green Infrastructure SPG (2017) for detailed guidance.
- 3.29 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.
- 3.30 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 Green Infrastructure SPG, prior to the submission of a planning application. This assessment must inform the site layout and design.
- 3.31 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.
- 3.32 Even where there is no loss of existing trees, the design of development should be adapted to accommodate new trees and soft landscaping appropriate to the location, scale and type of development. The design of new tree planting and soft landscaping should be informed by the 'Trees and Development' and 'Soils and Development' chapters in the Green Infrastructure SPG.

¹ This SPG is proposed to be replaced by a *Design and Parking Guidance SPG* within the LDP plan period.

Important natural features should influence site layout



Protected species

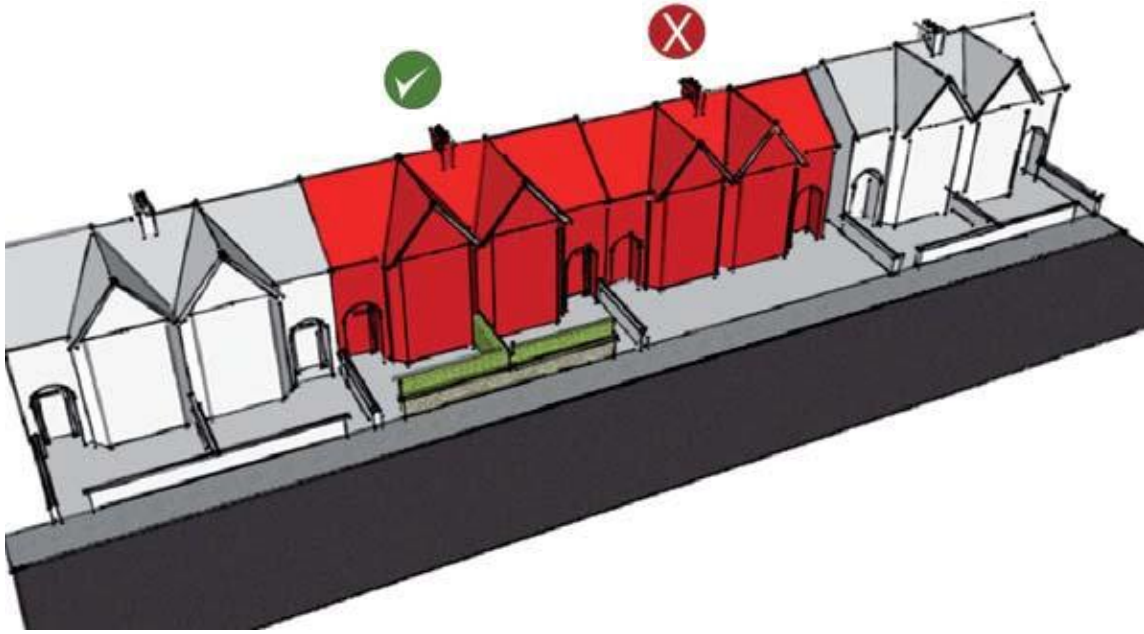
- 3.33 The Green Infrastructure SPG (2017) explains the actions which should be undertaken if protected species such as bats and nesting birds are present on a site. It is important that no works are undertaken until the necessary investigations have taken place. Surveys should be carried out by suitably qualified, experienced and licensed surveyors in accordance with published guidance and best practice. If EPS are likely to be affected by the proposals, the planning application should include details of all the mitigation that will be put in place to offset the anticipated impacts.
- 3.34 Further information on European Protected Species Licensing can be found at <https://naturalresources.wales/permits-and-permissions/protected-species-licensing/european-protected-species-licensing/?lang=en>

Boundary treatment

- 3.35 Boundary treatments fronting onto a highway or public space can make a significant contribution to the character of an area. It visually affects the street scene, influences street activity and affects 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.
- 3.36 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. The entrances along the boundary will need to mirror the rhythm and setting of existing entrances in the area.

- 3.37 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

- 3.38 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 *Residential Design Guide* SPG. 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

- 3.39 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.
- 3.40 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* SPG². Both vehicular and cycle parking must not be detrimental to the street scene, urban vitality or the historic built environment.

² Proposed to be replaced by a *Design and Parking Guidance* SPG within the LDP plan period

- 3.41 Where car parking is necessary, provision should be effectively incorporated into the design of the development as a whole and should not be introduced 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. Proposals which create car-dominated frontages that harm the street scene and/or create blank frontages at the ground floor will not be accepted.
- 3.42 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 or natural space. 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.
- 3.43 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.
- 3.44 New driveways should be appropriate to their context. New driveways serving rear garden development should be positioned to minimise any audio and visual disturbance to neighbouring dwellings.
- 3.45 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 is encouraged. Development in the central area (see Parking SPG) may include zero parking provision, however the merits and circumstances of each planning application will be taken into account when applying parking standards. This includes cycle parking, blue badge parking provision, visitor parking, and a range of locational and contextual factors. Details can be found 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. Residential amenity and privacy

- 4.1 Any infill, backland or site redevelopment must consider both the new and future occupiers' amenity, as well as the amenities available to neighbouring residents.

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. 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. Such amenity areas should measure at least 10.5m in depth or 50m² overall but generally reflect that which is characteristic of the surrounding area.
- 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 Green Infrastructure 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



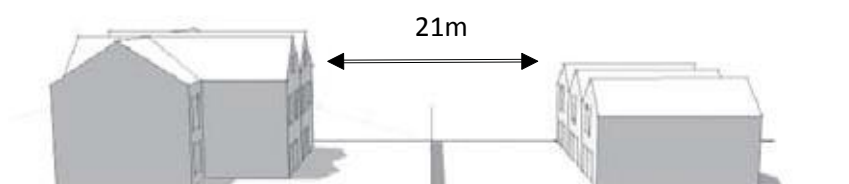
This example of a well-used shared amenity space is within a perimeter block development, Coin Street, London.

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.



25 / 45 degree rules

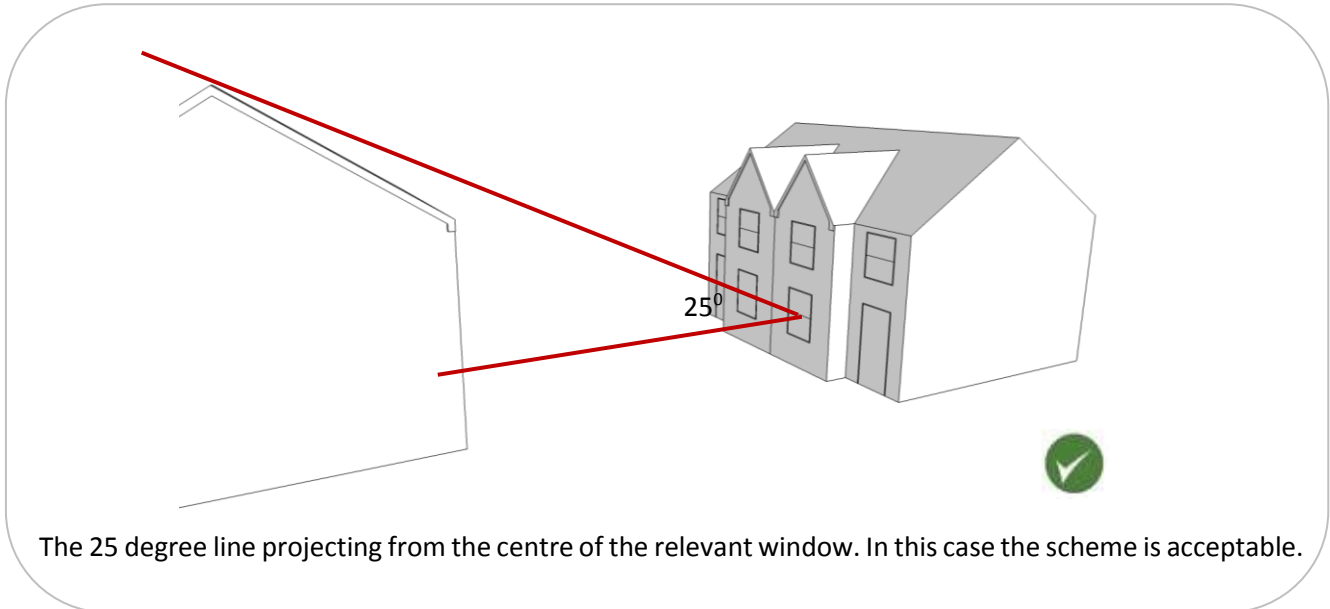
- 4.12 The assessment of sunlight and daylight is based on the BRE guidance presented in Site Planning for Daylight and Sunlight- a guide to good practice.
- 4.13 Although changes to permitted development rights have allowed certain types of infill development which might exceed these standards, where the opportunity to control exists, we will apply the standards in a reasonable manner.
- 4.14 These guidelines will sometimes be used flexibly as we recognise that light can be provided to living spaces via a number of means which might not be evident from the assessment approaches, whilst certain townscape situations might reasonably deserve some flexibility in their use. As such the standards are initially used as a trigger to invite further justification for a design.
- 4.15 Developments which do not meet these standards will be resisted without further justification or other reasonable measures being in place to provide adequate light. The standards apply equally to impacts on both new and existing buildings, and should be assessed accordingly. The standards will not apply to affects resulting from the height of minor gables. Where the standards are not being met, ways to improve the situation to the required standard will be sought.

Affected rooms

- 4.16 This guidance applies to habitable rooms which, according to the layout plan, are the main daytime living spaces of the scheme. Assessments will not relate to small kitchens (where there is no additional space to provide a dining area large enough to accommodate a table and chairs - typically an area of 2m² in addition to kitchen space), toilets, bathrooms, circulation spaces, storerooms or similar spaces. Rooms containing beds will only be included in an assessment if they form part of the daytime living space. Rooms containing more than one effective source of light, such as windows on other facades, light wells or tubes will not be included in any assessment.

The 25 degree rule

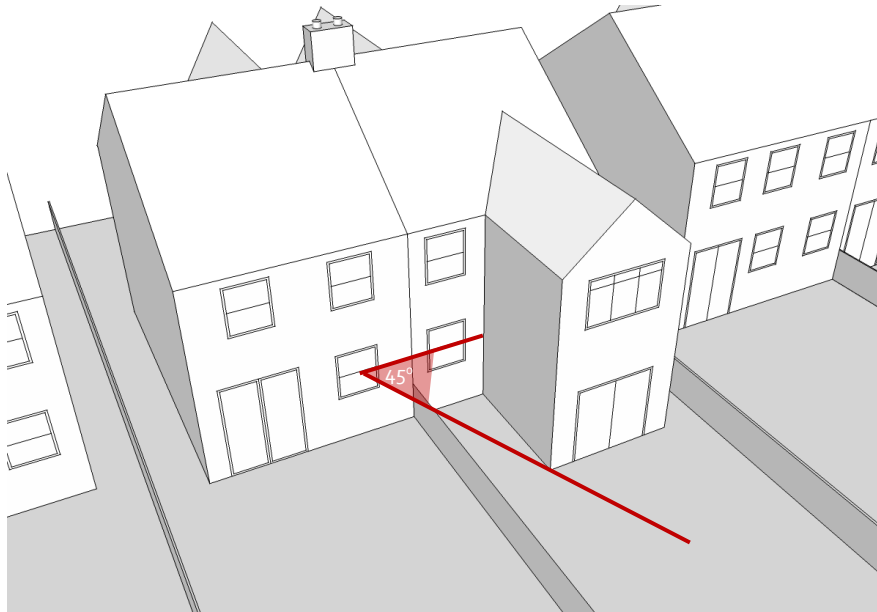
- 4.17 The first assessment relates to windows facing other buildings or relevant structures. A significant building or structure will be obstructing reasonable light to a relevant window if it breaks a line projecting up from the centre of the relevant window 25 degrees from the horizontal.



- 4.18 If obstruction occurs, applicants will be required to provide proof that windows will not be adversely affected by this structure by quantifying the daylight using the Skylight Indicator or Waldram assessments set out in the BRE publication. The measure of daylight reaching a window should not fall below 27%. Software applications exist to help with such an assessment.
- 4.19 If the window is in a glass door, the line can originate from 2 metres above the relevant floor or storey level.
- 4.20 If a new building is improving an existing situation then the standards may be applied flexibly, and before and after studies should be provided.

The 45 degree rule

- 4.21 The second assessment relates to any extensions from an existing building line, and windows affected by this extension.
- 4.22 An extension will be obstructing reasonable light to a relevant window if it breaks a line projecting 45 degrees both horizontally (assessed in a plan) and vertically (assessed in relevant elevations) from the centre of the window.
- 4.23 Extensions with a pitched roof should be assessed from the centre of the pitch. This measure can also be applied to the assessment of relevant windows in a courtyard. Facing windows can be assessed using the 25 degree method.
- 4.24 It is particularly important to avoid the tunnelling effect, where a window is affected by projecting extensions from two directions.



A 45 degree line projecting from the centre of the window in both elevation and plan shouldn't hit the relevant extension.



In these cases the scheme is acceptable in both elevation and plan.



Sunlight

- 4.25 Windows facing within 90 degrees of due south will gain some direct sunlight for some period of the day, if there is no obstruction.
- 4.26 Sensitive design of living spaces will ensure that each dwelling has a main living room which can receive a reasonable amount of direct sunlight.

5. Conservation areas and listed buildings

- 5.1 Development within a conservation area, or affecting the setting of a conservation area, will only be permitted where it preserves or enhances the character, or appearance of the area.
- 5.2 Each of the Council's twenty-six adopted Conservation Area Appraisals (2004-2009) outline the historic significance of an area, contains a character assessment and recommends opportunities for the enhancement of that character. These also have further guidance for homeowners and those planning development within a conservation area. The appraisals (available at www.cardiff.gov.uk/conservation) were adopted following public consultation, and should be read in conjunction with this SPG.
- 5.3 Conservation Area consent is normally required for the demolition of a building within a conservation area. PPW and Circular 61/96 (to be replaced in 2017 by Technical Advice Note 24: The Historic Environment) provide more information.
- 5.4 Listed Building Consent is required for demolition, alteration or extension where the character of a statutory listed building is affected. 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.
- 5.5 Separate to 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. More information is available at www.cardiff.gov.uk/conservation.

6. Refuse

- 6.1 Adequate provision must be made for recycling, food, garden and general waste facilities within the guidelines of the Council's Waste Collection and Storage Facilities SPG. Appropriate access for collection will also need to be accommodated where the proposed residential dwellings are required to use communal waste facilities.
- 6.2 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. Where possible, all waste storage should be at the rear of the dwelling. In situations where waste is stored at the front of the property, it must be suitably screened from the highway.
- 6.3 The Council reserves the right to decide the waste receptacles required for new residential developments. Further details of the required receptacles can be found in the Waste Collection and Storage Facilities SPG.



Waste and recycling storage should be thoughtfully designed into the development.



Appendix A: Policy Context

- 7.1 **Planning Policy Wales** sets out Welsh 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.
- 7.2 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.
- 7.3 PPW (see Chapters 4 and 9) provides information specifically on infill development in the countryside.
- 7.4 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.
- 7.5 **Technical Advice Note (TAN) 12: Design** 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.
- 7.6 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.
- 7.7 **TAN 15: Development and Flood Risk** (para 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.
- 7.8 (Manual for Streets 1 and 2 (Department for Transport, 2007; 2010) is endorsed by Welsh 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.
- 7.9 [Design and Access Statements in Wales \(2017\)](#), has been written as an easy reference guide by the Design Commission for Wales, to assist those involved in writing and submitting applications for planning permission or listed building consent in Wales.
- 7.10 [Cardiff Conservation Area Appraisals](#) - 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.

Appendix B: Contacts

City of Cardiff Council

www.cardiff.gov.uk/planning
planning@cardiff.gov.uk
(029) 22 330800

Other Organisations

Cadw – Welsh Government’s historic environment service
www.cadw.wales.gov.uk

Design Commission for Wales – National organisation providing Design Review service and design guidance
www.dcfw.org

Design Council - Design support and advice to industry and communities
www.designcouncil.org.uk

Housing Design Awards - Recognition of excellence in the design and planning of new homes
info@hdawards.org

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

RSAW - Royal Society of Architects in Wales is the regional organisation of the Royal Institute of British Architects (RIBA)
www.architecture.com/RIBA/Contactus/OurUKoffices/Wales/Wales

RICS Wales - Royal Institute of Chartered Surveyors.
www.rics.org/wales

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 Advisors: 01656 761893 OR 01656 761888

Appendix C: Consultation

Public consultation was undertaken between Thursday 22nd June 2017 and the Thursday 3rd August 2017. A press notice was placed in a local newspaper on Wednesday 21st June 2017. Copies of the draft guidance was placed in all Cardiff libraries and at County Hall Reception. 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 Councillors, Welsh Government, Community Councils in Cardiff and any interested persons and the following organisations known to have general interest in planning in Cardiff or a potential interest in this guidance.

*** denotes consultees who have responded to consultation, in addition to members of the public and individual Councillors.

ACE - Action in Caerau and Ely	Cardiff Bus Users	Connections Design
Alder King	Cardiff Civic Society	Country Land and Business Association
Alternatives for Transport	Cardiff Community Housing Association	CSJ Planning Consultants
AMEC Environment & Infrastructure UK Limited	Cardiff Cycling Campaign	Cymdeithas yr iaith gymraeg
Arts Council of Wales	Cardiff Greenpeace	Danescourt Community Association
Arup	Cardiff Heliport	David Lock Associates
Asbri Planning Ltd	Cardiff International Airport Ltd.	Davies Sutton Architects
Associated British Ports	Cardiff Lib Dem Group ***	DavisMeade Agricultural
Association of Inland Navigation Authorities	Cardiff Local Access Forum	Derek Prosser Associates
Atkins	Cardiff Metropolitan University	Design Circle RSAW South
Austin-Smith: Lord	Cardiff Naturalists	Design Commission for Wales
Barratt Homes	Cardiff Pedestrian Liberation	Development Planning Partnership
Barton Willmore	Cardiff Transition	Development, Land & Planning Consultants Ltd
Bellway Homes	Cardiff University	Disability Arts Cymru
Biffa	Cardiff West Communities First	Disability Wales
Bilfinger GVA	Carolyn Jones Planning Services	DLP Consultants
Black Environment Network	CDN Planning	DLP Planning Ltd
Blake Morgan LLP	Celsa Manufacturing (UK) LTD	DPP Cardiff
BNP Paribas Real Estate	Cemex Uk Operations Ltd	DTB Design
Bovis Homes	CFW Architects	DTZ
Boyer Planning	CGMS Consulting	Dwr Cymru Welsh Water
Bristol City Council	Chartered Institute of Housing in Wales	Edenstone Homes
BT Group plc	Chichester Nunns Partnership	Equality and Human Rights Commission
Business in the Community Wales	Chris Morgan Planning Consultant	Ethnic Business Support Project
C2J	Chwarae Teg	Federation of Small Businesses
Cadwyn Housing Association	Civil Aviation Authority	First City Limited
Caerphilly County Borough Council	Coal Authority	FirstGroup plc
Campaign for the Protection of Rural Wales	Coleg Glan Hafren	Firstplan
Cardiff & Vale Parents Federation	Communities First Adamsdown	Forestry in Wales/Natural Resources Wales
Cardiff & Vale University Health Board	Community Housing Cymru	Freight Transport Association
Cardiff Access Group	Community Land Advisory Service Cymru	Friends of Nantfawr Community Woodland
Cardiff Against the Incinerator	Confederation of British Industry	Fulfords Land & Planning
Cardiff Bus	Confederation of Passenger Transport	

G L Hearn	Lovell Partnership	Race Equality First
G Powys Jones	Loyn & Co Architects	Radyr & Morganstown Association
Garden History Society	LUC	Radyr and Morganstown Community Council
Geraint John Planning Ltd	Madley Construction	Radyr and Morganstown Partnership and Community Trust (PACT)
GL Hearn Planning	Mango Planning and Development Limited	Radyr Farm
Glamorgan - Gwent Archaeological Trust Ltd	Marshfield Community Council	Radyr Golf Club
Glamorgan Gwent Housing Association	Martin Robeson Planning Practice	Rapleys
GMA Planning	McCarthy & Stone (plc)	RCT
Graig Community Council	Meadgate Homes Ltd	Redrow Homes
Graig Protection Society	Mike Pitt	Reeves Retail Planning Consultancy Ltd
Great Western Trains Company Limited	Mineral Products Association	Renplan
Grosvenor Waterside	Morgan Cole	Reservoir Action Group (RAG)
GVA	Mott MacDonald	Rhiwbina Civic Society
H O W Commercial Planning Advisors	National Federation of Builders	Rhondda Cynon Taf County Borough Council
Hafod Housing Association Limited/ Hafod Care Association Limited	National Youth Arts	RICS Wales
Halcrow	Natural Resources Wales ***	Rio Architects
Hammonds Yates	Neame Sutton	Riverside Communities First Team
Heath Residents Association	Network Rail	Robert Turely Associates
Herbert R Thomas LLP	Newport City Council	Roberts Limbrick
Home Builders Federation	NFU Cymru	Robertson Francis Partnership
Hutchinson 3G UK	North West Cardiff Group	Royal Commission on the Ancient & Historical Monuments of Wales
Hyland Edgar Driver	Novell Tullet	Royal National Institute for the Blind
Hywel Davies	O2 UK	RPS Group Plc
Interfaith Wales	Oakgrove Nurseries	RSPB Cymru
Jacobs Bابتie	Old St Mellons Community Council	Save Creigiau Action Group
Jeremy Peter Associates	Orange	Savills
JLL	Origin3	Scope Cymru
John Hughes	Pantmawr Residents Association	Scott Brownrigg
John Robinson Planning & Design	Peace Mala	Sellwood Planning
John Wotton Architects	Peacock & Smith	Shawn Cullen
Jones Lang LaSalle	Pegasus	SK Designs
JP Morgan Asset Management	Pentyrch Community Council	SLR Consulting
Keep Wales Tidy	Persimmon Homes	South Wales Chamber of Commerce Cardiff
Kelly Taylor & Associates	Peterson Williams	South Wales Police
Kingsmead Assets Limited	Peterstone Community Council	South Wales Police Crime Prevention Design Adviser
Knight Frank	Phillippa Cole	South Wales WIN
Landscape Institute Wales	Planning Aid Wales	Splott and Tremorfa Communities First
Level Ltd	Planning Potential	Sport Wales
Lichfields	Police & Crime Commissioner	SSE Energy Supply Ltd
Linc-Cymru	Powell Dobson	
Lisvane Community Council	Powergen	
Llandaff Conservation Group	Prospero Planning	
Llandaff Society	Quarry Products Association	
	Quinco	
	Quod	

St Fagans Community Council
Stedman Architectural
Stewart Ross Associates
Stonewall Cymru
Stride Treglown Town Planning
Stuart Coventry Scott Wilson
Sullivan Land & Planning
Sustrans Cymru
Taff Housing Association
Tanner & Tilley
Taylor Wimpey
Terry Nunns Architects
The 20th Century Society
The Boarding Centre Ltd
The Design Group 3
The Georgian Group
The Institute of Cemetery and
Crematorium Management

The Land Mark Practice
The Planning Bureau
The Royal Town Planning Institute
The Urbanists
The Victorian Society
The Wildlife Trust of South & West
Wales
Theatres Trust
T-Mobile (UK) Ltd
Tongwynlais Community Council
Torfaen County Borough Council
Turley
United Welsh Housing Association
Urban City Ltd
Velindre NHS Trust Corporate
Headquarters
Virgin Media
Vodafone

Wales & West Housing Association
Wales Council for Voluntary Action
Wales Women's Aid
Watts Morgan
Welsh Ambulance Services NHS Trust
- South East Region
Welsh Government
Welsh Government - Economy Skills
and Transport Division
Welsh Language Commissioner
Welsh Tenants Federation Ltd
Wentloog Community Council
White Young Green
Wimpey Homes
WS Atkins Planning Consultants
Wyevale Garden Centre

Appendix D: Summary of External Consultation Comments and Responses

Page / para	Comment	Response
Section 3	Suggest stating that surveys for protected species should be undertaken by suitably qualified, experienced and licensed surveyors in accordance with published guidance and best practice. If EPS are likely to be affected by the proposals, the planning application should include details of all the mitigation that will be put in place to offset the anticipated impacts.	Agree. Text added at paras 3.33 and 3.34
Section 3	Suggest stating that further information on European Protected Species Licensing can be found at https://naturalresources.wales/permits-and-permissions/protected-species-licensing/european-protected-species-licensing/?lang=en	Agree. Text added as para 3.33
General	No reference is made to flood risk. Consider that reference should be made to the potential need to submit a Flood Consequences Assessment (FCA) if the application site is located within Zone C as defined by the Development Advice Map (DAM) and for development to have regard to the requirements of Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).	Disagree – this information is at para 7.7
7.7	Typing error, (Flood Consequence Assessment)	Corrected
Page 10 (Redevelopment example – corner site)	The example provided of the corner site development on Penylan Road is an interesting building and merits its place in the street scene. However, the claim that it re-interprets the Edwardian style of nearby properties needs further explanation. The ‘re-interpretation’ argument needs to be made clearer as this is key to many objections. In what way, does this example re-interpret Edwardian architecture? Without such clarity, it simply becomes a subjective assessment which, in the experience of many ward members and representatives, tends to be the assessment of officers.	Clarification added to the example for the avoidance of doubt: <i>This is evident in roof materials, deep eaves and steep pitch, use of natural stone combined with stone coloured render, projecting bay windows and vertically emphasised fenestration with narrow framing.</i>
Page 14 top example	By contrast, the example of the infill development is less successful and in fact lacks a lightness of touch that characterises the neighbouring buildings. In an understandable attempt to avoid pastiche, the bay frontages are overly obtrusive.	Agreed that the scheme is not successful in every regard. Note regarding the bays added to the annotation for this example.

<p>Page 15 top example</p>	<p>The first example of page 15 is also a poor template for how windows should maintain a coherence with existing buildings. The claim in the SPG that it does not ‘harm the street scene’ seems unsustainable. A better, alternative example should be found.</p>	<p>Commentary amended to remove reference to street scene. However, this is still considered to be an appropriate example to include.</p>
<p>Building line diagrams at pages 17-18</p>	<p>Finally, while we recognise the importance of infill development in contributing to our housing supply, we also fill this should not be at the expense of good architecture and consistency of design. We would therefore like to see more explicit guidance on the depth of infill developments, which may not be obtrusive from the street but which break the dominant housing line when seen from the rear of neighbouring properties or gardens. It is one thing to ensure that the street front remains coherent. We believe the view from the rear should be given significant weight too and, at present, this SPG fails to do that.</p>	<p>The guidance relating to building lines is primarily relates to the character of streets in terms of public viewpoints. Concerns relating to depth of development and over dominance to the rear is assessed on a case by case basis depending on privacy, overlooking and overshadowing considerations. As such, no amendment is considered necessary.</p>

