

Leckwith Quay, Leckwith Road, Leckwith Planning Report Addendum

On behalf of Mr P. Worthing

November 2022



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1.0 INTRODUCTION

- 1.1.1 This Planning Report Addendum has been prepared on behalf of Mr Worthing in support of the submitted hybrid planning application for the residential development for up to 250 dwellings (submitted in OUTLINE), associated highway and bridge improvement/realignment works (submitted in FULL). Development involves the demolition of all buildings on site and of the existing B4267 Leckwith Road Bridge.
- 1.1.2 The application, which was accompanied by an Environmental Statement (ES), was submitted to both Vale of Glamorgan Council and Cardiff Council on 7th October 2020. The application was registered by Vale of Glamorgan Council under the reference number 20/01218/HYB and by Cardiff Council under the reference number 20/02081/MJR.
- 1.1.3 This Addendum has been prepared in response the updated National Policy position in respect of the development proposals since the October 2020 Planning Report was written as well as in response to the consultation comments that have been received since the planning application was submitted.
- 1.1.4 This Addendum should continue be read alongside the October 2020 Planning Report.



2.0 PLANNING POLICY FRAMEWORK

2.1 National Planning Policy

2.1.1 On the 24th February 2021, the Welsh Government (WG) published the 11th Edition of Planning Policy Wales (PPW11). Alongside this, the National Development Framework 'Future Wales – the National Plan 2040' (Future Wales) was also published.

2.1.2 Due to the publication of Future Wales and PPW11, paragraphs 4.2.2 to 3.2.17 of the October 2020 Planning Report have been superseded and the updated text set out below should be read in its place. It should however be noted that whilst Welsh Government has strengthened its commitment to meeting the challenges of climate change through the revision to PPW and the introduction of Future Wales, the underlying policy messages and content of the National Policy set out in the October 2020 Planning Report remains largely unchanged.

Future Wales

2.1.3 Future Wales is the new national development framework which sits alongside PPW11 and sets the direction for strategic and local development plans for the 2020-2040 period. It replaces the previous Wales Spatial Plan as the first National Spatial Plan which forms part of the statutory development plan. Future Wales sets the direction for investment in infrastructure and strategic development across Wales. It makes clear the importance of planning new infrastructure and development in such a way that they are complementary rather than competing priorities, ensuring opportunities are maximised and multiple benefits are achieved. Key priorities include sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of communities.

2.1.4 Future Wales has been prepared in the context of Wales' three-tiered development plan system and positioned as the highest tier of development plan. It is of material consideration in plan making and decision making. The strategy seeks to address key national priorities through the planning system, by providing a framework which will in turn direct strategic and local development planning. Being focussed on solutions to issues and challenges at a national scale, it therefore does not allocate development to specific locations nor does it direct specific land uses.

2.1.5 Instead, Future Wales provides strategic direction for all scales of planning and sets out policies and key issues to be taken forward at the regional scale by Strategic Development Plans and at local authority level by Local Development Plans. Strategic and Local Development Plans are required to be in conformity with Future Wales and must be kept up to date to ensure they and Future Wales work together effectively.

2.1.6 A number of challenges and opportunities are identified for Wales nationally, challenges including climate change and Covid 19 and opportunities including progress towards a low



carbon economy, renewable energy generation and abundance of natural resources. A changing society, the need for good quality housing, prosperity and increasing resilience in the economy as well as improved connectivity are also identified as drivers for the next 20 years.

2.1.7 Future Wales' outcomes are overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in PPW11. The aim of the spatial strategy and regional ambitions contained within Future Wales is to achieve these outcomes. These outcomes are inter-related and inter-dependent and will improve places and well-being across Wales.

2.1.8 There are 11 outcomes set out in Future Wales which collectively are a statement of where Wales 'wants to be' in 20 years. These 11 outcomes envisage a Wales where people live:

- and work in connected, inclusive and healthy places;
- in vibrant rural places with access to homes, jobs and services;
- in distinctive regions that tackle health and socio economic inequality through sustainable growth;
- in places with a thriving Welsh Language;
- and work in towns and cities which are a focus and springboard for sustainable growth;
- in places where prosperity, innovation and culture are promoted;
- in places where travel is sustainable;
- in places with world-class digital infrastructure;
- in places that sustainably manage their natural resources and reduce pollution;
- in places with biodiverse, resilient and connected ecosystems; and
- in places which are decarbonised and climate resilient.

2.1.9 The Future Wales spatial strategy is made up of 36 policies and provides a framework to achieve the outcomes outlined above. This includes identifying and connecting key national and regional centres, providing a basis for long term infrastructure investment, identifying priorities for the planning system and providing a framework for the management of natural resources.

2.1.10 Initial policies in the spatial strategy direct strategic areas for growth, outlining both Regional Growth Areas and National Growth Areas, with National Growth Areas being economically distinct. The National Growth Areas includes, Cardiff, Newport and the Valleys which also appears to include the Vale of Glamorgan, within which the development proposal is located alongside Cardiff. Strategic placemaking principles are also introduced to shape urban growth and regeneration in these areas and range from ensuring a mix of uses and housing types to improving walkability and permeability as well as increasing population density and promoting a plot-based approach to development which incorporates green infrastructure.

2.1.11 Policies which seek to ensure vibrant rural communities and a thriving rural economy are also central to the strategy in recognition that large parts of Wales are rural in character with 40% of



the population living in settlements with fewer than 10,000 people. These policies focus on supporting development of innovative and emerging technology businesses and sectors to help rural areas unlock their full potential, broadening the economic base, and creating higher paid jobs. A number of policies focus on sustainable management of the natural environment, including commitment to development of a National Forest and management of flood risk as well as commitment to enhance biodiversity, support resilient ecosystems and ensure safeguarded provision of green infrastructure.

2.1.12 In parallel with the aspirations of PPW11, Future Wales’ spatial strategy aims to support Welsh Government to address the Climate Emergency declared in 2019 through its policies and ambitions.

2.1.13 Future Wales policies that are of particular relevance to the development proposals include:

Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

2.1.14 It states that the growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. As such, Urban growth and regeneration should be based on the following strategic placemaking principles:

- Creating a rich mix of uses;
- Providing a variety of housing types and tenures;
- Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;
- Increasing population density, with development built at urban densities that can support public transport and local facilities;
- Establishing a permeable network of streets, with a hierarchy that informs the nature of development;
- Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and

2.1.15 Integrating green infrastructure, informed by the planning authority’s Green Infrastructure Assessment.

Policy 3 – Supporting Urban Growth and Regeneration

2.1.16 The policy outlines that the Welsh Government will play an active and enabling role to support the delivery of urban growth and regeneration to ensure that growth and regeneration aspirations can be met.

Policy 7 – Delivering Homes including Affordable Homes

2.1.17 The delivery of housing and affordable homes at levels which meet local and regional needs is also of focus in the spatial strategy. Future Wales specifically outlines that the planning system



must facilitate the provision of additional market and affordable housing and recognises that there is a complex picture of housing need and provision with the opportunities people have varying significantly depending on income and where they live in Wales.

Policy 8 – Flooding

2.1.18 The policy outlines that flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported.

Policy 9 – Resilient Ecological Networks and Green Infrastructure

2.1.19 The policy outlines that the strategic focus of Future Wales on urban growth requires an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable. In particular, the policy recognises the need to maximise the use of green infrastructure and nature-based solutions as part of shaping urban growth, supporting rural communities and responding to the twin challenges of addressing the climate emergency and reversing biodiversity decline.

Planning Policy Wales Edition 11 (February 2021)

2.1.20 PPW11 primarily represents a refresh of PPW10, in particular, the refresh brings PPW in line with the Future Wales National Plan and other policy changes since PPW10 was published in December 2018, including Welsh Government’s ‘Prosperity for All: A Low Carbon Wales and the National Infrastructure Commission for Wales ‘Annual Report 2020.

2.1.21 With this revision, therefore, comes an added focus on climate change and responding to the Climate Emergency by placing greater emphasis on principles of creating and sustaining communities, reducing car dependency and making best use of resources.

2.1.22 Placemaking was previously established as the core of PPW10 under key placemaking themes. PPW11 retains these placemaking themes and additionally sees the introduction of the Placemaking Wales Partnership Charter which has evolved to support the development of high-quality places across Wales. The Charter includes six placemaking principles:

- People and community – proposals are shaped to meet needs of the local community, as well as to create, integrate, protect and enhance a sense of community, promoting equality.
- Location – places grow and develop in a way that uses land efficiently, supports and enhances existing places and is well connected.
- Movement – walking, cycling and public transport are prioritised to provide a choice of transport modes and avoid dependence on private vehicles.
- Mix of uses – places have a range of purposes which provide opportunities for community development, local business growth and access to jobs, services and facilities.
- Public realm – streets and public spaces are well-defined, safe and inclusive, designed to be robust and adaptable and well connected to existing places.
- Identity – the positive, distinctive qualities of existing places are valued and respected.



2.1.23 PPW goes on to define placemaking as being an ‘holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well being in the widest sense. Placemaking considers the context, function and relationships between a development site and its wider surroundings. This will be true for major developments creating new places as well as small developments created within a wider place.’

2.2 Local Planning Policy

2.2.1 No changes or updates to the Local Planning Policy Context have been made since the 2020 Planning Report was written.



3.0 PLANNING POLICY ASSESSMENT OF THE PROPOSALS

- 3.1.1 The October 2020 Planning Report undertook a comprehensive assessment of the development proposals in line with all relevant planning policies. Whilst it is recognised that additional assessments and surveys have been undertaken in support of the development proposals to take into account the consultation responses received, the content of the 2020 policy assessment of the proposals (outlined in Section 5) remains largely unchanged.
- 3.1.2 The following updates are however noteworthy and all updated technical assessments are included the ES Addendum.

3.2 Flood Risk

- 3.2.1 NRW have undertaken a detailed review of the submitted hydraulic modelling information to ensure that it was fit to inform the Flood Consequences Assessment (FCA) required under Technical Advice Note 15: Development and Flood Risk.
- 3.2.2 An updated FCA and SAB Compliant Drainage Strategy have been submitted in support of the development proposals for the site. From the substantial amount of flood modelling work undertaken to date it is considered that the site is suitable, in drainage and flooding terms, to accommodate a well-designed and sustainable form of residential development, which with the inclusion of appropriate mitigation measures, is in line with TAN15. The latest NRW response (July 2022) received in respect of the planning application proposals also accords with this statement. A copy of NRW's latest response in respect flood risk (8th July 2022) is included at **Appendix 4**.
- 3.2.3 **The proposed scheme is not, therefore, in conflict with TAN15 or the flood risk, hydrological and drainage policies of the Vale of Glamorgan LDP Policy MD7.**

3.3 Ecology

- 3.3.1 An Extended Phase 1 supported by detailed species surveys have been undertaken for bats, otters, breeding birds, badgers, dormouse and great crested newts. Additional protected species surveys were carried out following consultation with NRW, Vale of Glamorgan LPA and Cardiff LPA. Specifically, an additional assessment of the suitability of the site habitats for natal use by otter was carried out in September 2020. Additional bat surveys including: building inspections, viaduct inspection and flight surveys (for built structures and trees), and ground & aerial tree surveys to look for any evidence of use by bats and characterise roosts where possible, all of which were undertaken in accordance with BCT good practice guidance (2016) (additional surveys undertaken during January 2021, August 2021 and September 2021).
- 3.3.2 A number of measures to create new habitats within the development have been included within the proposals and are further detailed within the updated Ecological Assessment (v6.1). These include a bat house, bat boxes on buildings and trees, bird boxes on buildings and trees, an



artificial kingfisher nest site, an artificial otter holt, reptile hibernacula and artificial invertebrate habitat features, such as bee walls and beetle banks. One wildlife pond is now incorporated into the masterplan with the ability to retain water all year round. The creation of habitat corridors and other ways of retaining connectivity between habitats within the site boundary, adjacent woodland and the river are also included along with the planting of native trees, shrubs and bankside vegetation. There will now be a fenced buffer of scrub vegetation from at least 5m from the top of the riverbank, apart from at the existing river access point. No new access points to the riverbank will now be created.

3.3.3 Based on the ecological survey work undertaken to date and given the incorporation of appropriate mitigation and compensation measures as recommended and detailed above, the overall conclusion is that the proposed development will not result in an unacceptably high level of adverse impact to the ecological features of the site or its environs. The latest NRW response received (July 2022) as enclosed **at Appendix 4**, also agrees with this statement subject to a number of conditions and the requirement of NRW licences to be obtained in advance of the development commencing.

3.3.4 **As such, the proposed development would not have an adverse impact in terms of ecology and biodiversity and would therefore accord with Vale of Glamorgan Policies SP10 and MD9.**

3.4 Landscape

3.4.1 A Landscape and Visual Impact Assessment of the development proposals has been undertaken and forms part of the Environmental Impact Assessment which outlines that, visually, the site is well contained and views into it are limited. In fact, out of the twenty-one viewpoints were initially assessed (a further viewpoint (No.7) was added at the request of the Vale of Glamorgan LPA) only seven offered a view of the site. This is because the site is very well contained by topography to the west, an elevated section of the ring road to the east and vegetation all round. Differing distance views were assessed from short to long distance, but only short distance views offered more than a glimpse of the site.

3.4.2 Of the seven viewpoints assessed, four were judged to have moderate adverse effect during the construction phase of the development which is assessed as significant. It is noted that the construction period is generally considered to have greater landscape and visual effects than the finished development because of the number of activities including site protection, demolition, groundworks, construction, power generation, lighting, and welfare.

3.4.3 The same seven viewpoints were assessed for the operational life of the proposed development on the site. Three were judged to have moderately adverse effects. These three were the viewpoints closest to the site on the Old Leckwith Bridge and on the Ely trail to the east of the site whereby the increased building heights (although of higher quality) would still obscure more of the woodland backdrop of the SLA. The additional viewpoint (no.7) from the path within Leckwith woods to the west of the site was assessed to have a moderate beneficial effect. This



was due to the receptor being elevated and looking down on the increased height of the buildings but looking at a higher quality scheme better integrated into its context and without the commercial clutter associated with the existing land use. The remaining viewpoints were assessed to not have significant effects.

- 3.4.4 The updated ES assessment concludes that the proposed development is likely to cause some significant adverse landscape and visual effects during the construction phase. It will, however, confer several significant beneficial landscape effects during the operational phase.
- 3.4.5 The negatives largely derive from the loss of trees within the ancient woodland which mitigation cannot fully replace. The positives largely derive from the enhancement of the settings of several landscape receptors by replacing low quality, ad hoc light industrial and commercial uses on site with a sensitive, well considered, integrated development with a coherent landscape, ecological and drainage strategy. Overall, the proposed development of the site provides opportunity to provide high quality buildings and a sensitive landscape scheme integrated within its context linking the woodland to the river.
- 3.4.6 In terms of the landscape strategy for the site, the masterplan has been amended since the October 2020 submission to reinforce the habitat and ecological links between the existing woodland and the river. The 'proposed 'green fingers' may have been denuded as the Masterplan was developed. As such, we have amended the Masterplan (ref: S102F) to reinforce the habitat and ecological links between the existing woodland and the river.
- 3.4.7 The masterplan layout has also been specifically adjusted to reduce the dominance of the road by the green finger in the approximate centre of the site. The paths have been curved and the road surface amended to be a softer surface such as a grass paver system. This has provided space in the middle of the road for large tree planting which continues through the green finger. Because of the valley nature of the site the powerlines are not a constraint as they are significantly higher above the site. Larger tree planting will therefore aid 'hop-over' and reinforce ecological connection between the river and the woodland. A naturalised play feature has also been indicated to the south-western side of the road at this location. An 'offline' pond (i.e. not connected to the sustainable drainage system) has been proposed within the southernmost green finger following ecological advice. This area will also house the bat house and a connecting line of trees.
- 3.4.8 As agreed with VOG Officers, the development proposals now exclude any woodland walks to maintain the existing ecology, but the existing 'Trelai Park to Leckwith Woods' footpath will be maintained and improved, where it is overgrown near to the site.
- 3.4.9 **The development proposals are therefore considered to comply with Vale of Glamorgan LDP Policies SP10, MG19 (6), MG21 and MD9.**

3.5 Trees



- 3.5.1 Further Arboricultural Impact Assessment was undertaken in August 2022 to assess and detail the extent of proposed tree loss and suggested replacement / natural regeneration.
- 3.5.2 The majority of woodland to be removed is a direct consequence of the need to provide a new realigned road and bridge. Calculations based on the attached Treescene AIA Plan Rev A 09/2022 indicate that the following numbers of trees will be removed to accommodate the proposed layout including new road and housing.
- Individual trees; 167 No. trees
 - Tree groups/woodland; 1,915m² = 211 No. trees (based on 1,100 trees per hectare)
 - Hedges; 110.15 linear metres (6 No. hedges lost)
- 3.5.3 We recognize these tree losses and their associated habitat need mitigation. The Landscape Strategy Drawing (ref: L-9001_P03) has been proposed to mitigate for the loss of trees and woodland and shows where new trees and woodland is to be planted within the main body of the development site itself and along the periphery of the existing woodland areas. A total of 496 trees are included within the development site, plus following ecological advice, other areas of replacement woodland will largely be left to regenerate themselves. There will therefore be a net increase of 31% of new trees being planted on site. Whilst the provision of new trees won't equate to a 2:1 replacement, the number of new trees equate to more than the area of lost original woodland.
- 3.5.4 We propose to replant trees focusing on native tree species or native derivative cultivars especially suited to urban areas or urban edge areas. This together with the proposed mix of new shrub planting within the development and the significantly improved riverside planting will minimize the loss of woodland and associated habitat.
- 3.5.5 As previously outlined, the comprehensive landscape strategy includes the creation of green links or 'fingers' between the woodland and the riverside has been a focus of the scheme from its inception and this concept has been enhanced further by softening the liner access road with less formal surface materials and alignments and providing space for significant tree planting to promote canopy 'hop-over'. The landscape strategy also illustrates management of riverside vegetation with the removal of inappropriate species such as Lawsons Cypress and enhancement with additional native tree planting. Riverside access is promoted with appropriate new pedestrian routes but constrained to walkways and existing river access points to maintain important existing wildlife habitats. The holistic approach between the design team means that the landscape and ecology schemes are fully integrated with the sustainable drainage scheme in terms of open water ponds, the provision of rain gardens, the use of highway verge swales, the creation of 'offline' ecological ponds, the sensitive provision of access to the riverside and



the appropriate replacement tree planting of native trees alongside natural woodland regeneration.

3.5.6 **The development proposals are therefore considered to comply with Vale of Glamorgan LDP Policies MD2.**

3.6 Noise

3.6.1 Due to the site's close proximity to the A4232, it is acknowledged that there is an identified risk of high external noise levels being experienced across the development site.

3.6.2 The results of the noise survey indicate that the noise levels across the development site are relatively high, with areas exceeding typical recommended external noise level limits for outdoor amenity and creating risk of high internal noise levels if openable windows are used.

3.6.3 In response to the noise levels and comments received from the Council's Regulatory Services Team, the building massing and site layout was reviewed and refined to provide acoustic screening to amenity areas and lower noise levels. Acoustic barriers are no longer proposed as part of the development proposals.

3.6.4 The updated noise mapping shows that screening and the reconfiguration of some of the building massing can be used successfully to create large areas of outdoor amenity areas that have ambient noise levels below 55dB, thereby falling within WHO and TAN 11 recommendations. However, there will still be areas that exceed the recommended lower limit by up to 4dB, falling within TAN11 Noise Exposure Category B.

3.6.5 Internal noise level within dwellings can however be controlled through the design of the façade. This may require the specification of suitable opening window types and orientation, or through additional façade elements to further improve the acoustic attenuation, such as architectural fins/screening, window baffles, secondary facades or recessed balconies. The acoustic design of facades will be further developed once thermal modelling has been carried out of the proposed developments, so to fully understand the open area requirements for overheating, and where the acoustic performance can be improved.

3.6.6 It is therefore considered that with the sensitive design of the site and the inclusion of appropriate mitigation measures, the site would be suitable for residential purposes. **The development proposals are therefore considered to comply with TAN11 and Vale of Glamorgan LDP Policy MD7.**

3.7 HSE

3.7.1 Part of the site is located within a Health and Safety Executive Consultation Zone. A formal request to revoke Hazardous Substances Consent HSC 1992/00959/HAZ has been made to Vale



of Glamorgan Council as there has been no commercial activity within the Liquefied Petroleum Gas business on the site since 2014.

3.8 Overheadlines

- 3.8.1 Consultations have been undertaken directly with Western Power regarding the high level overhead power lines cross the site.
- 3.8.2 In regard to the 132kv overhead line, Western Power confirmed that it had no objections to development under or adjacent to our 132kV lines provided adequate clearances were maintained, and that vehicular access is possible to towers on completion of the development. Their letter advised that the minimum clearance to ground/road is 6.7m and that the minimum clearance to buildings or other structures are 3.6m. They do however recommend that clearances of 7.0/7.3m be maintained to ground/road and 6.6m is maintained to buildings. It has also been subsequently confirmed that Western Power does not have any easement or wayleave over the site associated with these power lines.
- 3.8.3 In regard to the 33kv line, it is Western Power's preference to underground the service. It is proposed that the line be diverted and re-routed within the new highway bridge.



4.0 Placemaking

4.1 Placemaking

4.1.1 Future Wales sets out the Welsh Government’s objectives for sustainable development and good design and placemaking. Future Wales is focussed on achieving the objectives of the Well-being of Future Generations (Wales) Act (WBFGA) 2015. Future Wales confirms that the Act seeks to influence the way we plan for new development; it demands that development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales and, accordingly, the commitment to delivering sustainable development and maximising the contribution to each of the well-being goals within the Act.

4.1.2 As previously outlined, Policy 2 of Future Wales relates to ‘Shaping Urban Growth and Regeneration – Strategic Placemaking’. It states that the growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. As such, Urban growth and regeneration should be based on the following strategic placemaking principles:

- Creating a rich mix of uses;
- Providing a variety of housing types and tenures;
- Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;
- Increasing population density, with development built at urban densities that can support public transport and local facilities;
- Establishing a permeable network of streets, with a hierarchy that informs the nature of development;
- Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and
- Integrating green infrastructure, informed by the planning authority’s Green Infrastructure Assessment.

4.1.3 Similarly, PPW11 (2021) has a focus on placemaking to achieve the WBFGA goals and objectives. Paragraph 2.3 of PPW states: ‘The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all.’



4.1.4 The submitted application proposals are considered to meet the national sustainable placemaking outcomes, as advocated by Future Wales and outlined in PPW11 for the following reasons:

Making best use of resources

4.1.5 The site is brownfield and seeks to make use of an existing under-utilised brownfield site, the development proposal will have no impact on the availability of agricultural land as none will be utilised.

4.1.6 The proposals also include the realignment of the existing B4267 Leckwith Road link and a new bridge crossing of the River Ely. The replacement of the existing B4267 Leckwith Road represents a key element of the development proposals as the existing bridge is in a critical state of disrepair and in need of urgent repair or redevelopment. Without such repair or replacement, it is likely that the bridge will have to be closed to traffic thereby rendering the B4267 inaccessible from the east. The route and new bridge configuration presented in this application is regarded to be the most beneficial and efficient option available.

4.1.7 It is considered that the scale development can be successfully assimilated into the host landscape through the retention, protection and enhancement of locally characteristic features such as the surrounding woodland and riverside to reduce any perceived impact of the development on the host site. Importantly, the proposed development will replace the low quality, ad hoc light industrial and commercial uses currently on site with a sensitive, integrated housing scheme with a strong landscape strategy.

4.1.8 The provision of residential development within an area which lies immediately adjacent to the built-up settlement boundary offers an opportunity for the Vale of Glamorgan to deliver homes focussed in proximity to existing facilities and services.

Maximising environmental protection and limiting environmental impact

4.1.9 A combined landscape and ecological strategy has been devised for the site which seeks to retain and enhance the woodland, habitats and biodiversity on and across the site. In particular, the strategy seeks to create green fingers of woodland planting to connect the woodland and riverside habitats and forming wildlife corridors between the two. The green fingers will also act as dark corridors across the site providing trees as a buffer from the built environment and shield from any necessary lighting on site. Planting will also be bolstered along the riverside.

4.1.10 Providing connections between key features via areas of public open space, and SUDs features will ensure areas of environmental value do not come under additional pressure from the development of the site. The provision of robust corridors and buffers will build in resilience to the habitats/features across the site.

4.1.11 Active, appropriate management will be an important consideration in terms of maintaining a 'resilient' GI network.



4.1.12 In particular, the 2020 Environmental Statement which has been prepared in support of the development proposals assesses the potential environmental effects that the development would have on the site and the local environment. With the inclusion of appropriate mitigation measures, the Environmental Statement concludes that the development of the site would not give rise to any significant adverse effects which would preclude the development of the site.

Facilitating accessible and healthy environments

4.1.13 As previously outlined, site's location is highly sustainable and accessible having access to a range of facilities and services including employment, shopping, education, health, community, leisure and sports facilities and open and green space, maximising opportunities for community development and social welfare.

4.1.14 The site also has meaningful access to existing walking, cycling and public transport routes and can provide a choice of transport modes and help reduce dependence on private vehicles. The site also has opportunities to incorporate well designed and safe active travel routes which can connect into the wider active travel and public transport network.

Growing our Economy in a Sustainable Manner

4.1.15 Short-term economic benefits will be achieved via the construction phase of the development. The increase of population once the development is occupied, coupled with the site's accessibility to local facilities and commercial outlets will also benefit the sustainability of those facilities. The design of the development and the creation of the new pedestrian and cycle links into the surrounding area will foster activity and vibrancy within the local area.

Creating and sustaining communities

4.1.16 The development proposals will deliver a key component of highways infrastructure through the replacement road bridge which is vital to maintaining accessibility and connectivity between Cardiff and the Vale of Glamorgan. The development also seeks to deliver a cohesive community accessible to all members of society and can cater for a range of needs (age and health) and affordability. The development density and the mix of uses and tenures will help to support a diverse community and vibrant extension to the existing community whilst supporting the principles of community safety.

4.1.17 The site is well connected to the wider environment for good health and well-being as well as providing opportunities to enjoy the natural environment within the site.

4.1.18 An assessment of the site in relation to PPW11's Placemaking Appraisal Framework and Placemaking Outcomes is included at **Appendix 5** of this Report. The Assessment clearly demonstrates the site's ability to deliver homes which fully accord with the Welsh Government's placemaking objectives.



5.0 Summary and Conclusion

5.1.1 In summary the opportunity offered by the proposed development will:

- accord with all relevant National and Local Development Policies;
- make use of an existing under-utilised brownfield site, the development proposal will have no impact on the availability of agricultural land as none will be utilised;
- facilitate a range and choice of housing;
- deliver a key component of highways infrastructure which is vital to maintaining accessibility and connectivity between Cardiff and the Vale of Glamorgan;
- deliver a cohesive community accessible to all members of society, including older people;
- protect and enhance the existing built and natural environment;
- connect to the wider environment for good health and well-being;
- enable sustainable access by walking, cycling and bus to employment, shopping, education, health and community facilities and green infrastructure;
- encourage modal shift; and
- encourage and improve social well-being and health by offering opportunities for access to social interaction and physical activity resources present in the area.



Appendix 4 – NRW Consultation Response (July 2022)



Rivers House,
St Mellons Business Park,
St Mellons,
Cardiff,
CF3 0EY

The Vale of Glamorgan Council,
Dock Office,
Barry Docks,
Barry,
CF63 4RT

ebost/email:
southeastplanning@cyfoethnaturiolcymru.gov.uk

08/07/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: Hybrid planning application for residential development for up to 250 dwellings (submitted in OUTLINE), associated highway and bridge improvement / realignment works (submitted in FULL). Development involves the demolition of all buildings on site and of the existing B4267 Leckwith Road Bridge

LLEOLIAD / LOCATION: LECKWITH QUAYS

Further to our email dated 26 May 2022 and the completion of the hydraulic model review, we have now considered the Flood Consequences Assessment (FCA) by WSP, reference 7005-3561-C-RP-0003-05-FCA, dated April 2022 and are now able to advise your Authority on the acceptability of flood risks and consequences in line with TAN15, as provided below. The FCA was sent to us along with the hydraulic modelling review information, therefore, we are unsure whether your Authority has received a copy.

We have concerns with the application as submitted. We recommend that you should only grant planning permission having considered the following advice on flood risk elsewhere.

We also advise that based on the information submitted to date, conditions regarding flood risk, European protected species, pollution prevention and land contamination should be attached to any planning permission granted. Without the inclusion of these conditions, we would object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes highly vulnerable development (up to 250 residential dwellings (OUTLINE) and associated highway and bridge improvement / realignment works (FULL)). Our Flood Risk Map confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in TAN15 and the Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zones 2 and 3 Rivers and Sea.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate through the submission of an FCA that the potential consequences of flooding can be managed to an acceptable level.

As advised in our email of 26 May 2022, we have completed a review of the updated hydraulic flood model. Although there are some minor errors in the model, it is now considered suitable to support and inform the FCA.

It is noted that the proposed bridge drawing supplied in the Hydraulic Model Report and FCA has some errors, and it has been assumed that the values used to represent the proposed design applied within the model are correct over those shown in the drawing in the FCA. We note the proposed cycle ramp has now been included within the model, the elevation and material layer used to represent the development and the bridge soffit have also been updated in the model.

You should note that the advice on increased flood risk elsewhere is heavily dependent on the proposed culverts being constructed and operating as indicated in the final model and FCA. Any changes to the design of the culvert, bridge, cycle path or elevations of the site, may impact flood risk to the site or have impacts elsewhere. If any changes to the design are undertaken, the consequences of flooding **must** be reassessed.

A key mitigation measure is setting the soffit level of the proposed bridge at 8.73mAOD which is represented in the modelling, however there is no reference to this in the FCA dated April 2022 by WSP. The drawing 70053561-002 within the FCA does not include this soffit level. Therefore, we advise you may wish to request an updated drawing showing the soffit level of 8.73mAOD from the applicant, to ensure the design (and mitigation measure) is precise and enforceable. As a minimum, we seek a planning condition attached to any permission granted securing the soffit level of the bridge.

Condition: soffit level to be set at 8.73mAOD

Justification: to manage and reduce the risk of flooding to the proposal and elsewhere.

Flood Risk Elsewhere A1.12 Criteria

The FCA states that the culverts prevent any further flood risk to third parties by containing flood waters within the channel. There is a predicted increase within a wooded area immediately downstream of the site. This area is not currently at risk of flooding, but post-development is predicted to flood to depths of 20mm in the extreme 0.1% annual probability event. This is described in section 4 of the FCA (Hydraulic model - key results) which states 'this increase is principally constrained to the river channel, except immediately downstream of the site within the wooded area where an increase of 2 cm is observed on the southern bank'. It should be noted this is not shown to affect any buildings or properties.

There are also reductions in flood risk in the wider areas which are also described in section 4 of the FCA which you may want to consider in the overall planning balance.

While the detriment may be perceived to be a small amount and affecting a limited area, you should note paragraph A1.12 of TAN 15 which states “A site should only be considered for development if the following conditions can be satisfied; - No flooding elsewhere.”

The modelling also identifies further increases in water levels in the wider area during the 1% plus climate change allowance (CCA) event when this coincides with 80% blockage to the central arch of the historic bridge and a 30% blockage to the upper section of both bypass culverts. Some effects are noted on the River Taff by Cardiff Bridge, due to higher levels within Cardiff Bay as well as additional overflow around Stuart Street adjacent to Cardiff Bay. However we have no concerns over these changes which are likely to be modelling instabilities rather than representing actual flooding mechanisms during this flooding event.

Further advice on TAN15 acceptability criteria

We note that the development covered by this application is split into two parcels on either side of the proposed new bridge crossing referred to as the northern (1.3 ha) and the southern plateaus (6.4 ha). It is proposed to raise the development parcels above the flood level to reduce the risk of onsite flooding, while flood relief culverts bypassing the historic bridge are also proposed.

Fluvial Assessment - A1.14 Criteria

During the 1% CCA flood event the development is predicted to remain flood free and therefore A1.14 compliant for the post development scenario. This is based on a 1% CCA flood event or design flood level of 8.38m AOD for the upstream end of the site and 7.90m AOD at the downstream end. The FCA therefore recommends that finished floor levels will be set at 8.96m AOD at the upstream end and 8.50m AOD at the downstream end. All ancillary areas are predicted to be flood free during this event.

However, your Authority should note that should a 1% CCA event coincide with the modelled blockage scenario of 80% blockage to the central arch of the historic bridge and a 30% blockage to the upper section of both bypass culverts, shallow flooding is predicted post-development to the northern plateau of circa 50mm in ‘external and ancillary areas only’ which we understand to be landscaping areas. The hazard classification rating is assessed to be low with the remainder of the proposed development site predicted to be flood free. On this basis, subject to your authority being satisfied with those consequences, we raise no further concerns.

If planning permission is granted, the FCA dated April 2022 by WSP should be included in the approved plans and documents condition on any decision notice.

Fluvial Assessment - A1.15 Criteria

During the 0.1% fluvial flood event the residential buildings are predicted to remain flood free and therefore A1.15 compliant for the post development scenario. The FCA states the site is flood free during this event, (section 6 mitigation summary), however no flood levels have been provided.

Your Authority should note that should a 0.1% event coincide with the modelled blockage scenario of 80% blockage to the central arch of the historic bridge and a 30% blockage to the upper section of both bypass culverts, shallow flooding is predicted to the northern plateau of less than 200 mm in external and ancillary areas only. However, this is within the indicative tolerable conditions set out in A1.15 of TAN15 i.e. <600mm. The hazard classification rating is assessed to be low with the remainder of the proposed development site predicted to be flood free.

Tidal Assessment

We consider the risk of tidal flooding in the 0.5% and 0.1% CCA tidal flood events to the proposed development is minimal as the site is afforded protection by Cardiff Bay Barrage.

Emergency Access/egress

Section 5.4 of the FCA states that the B4267 which accesses both plateaus of the site is predicted to flood to impassable depths on the opposite (eastern) side of the bridge, however the route westward remains flood free. This provides a connection to the wider strategic highway network via the B4267 and A4055.

We recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on or grant the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

Further Advice

The conditions, and advice in relation to **Cwm Cydfin Site of Special Scientific Interest (SSSI)**, set out in our letters of 4 November 2021, reference CAS-168336-Y0R3 and 8 December 2020, reference CAS-129806-T4T9 remain **unchanged save for the European Protected species conditions which are separated out into the full and outline aspects of this hybrid application**. For ease of reference, all the conditions and informatives requested are included below:

European Protected Species

Condition: Bat Conservation Plan (full application)

No development, including site clearance shall commence until a Bat Conservation Plan has been submitted to and agreed in writing by the Local Planning Authority and shall include:

- Details of impacts (direct and indirect) from the highway and bridge works upon any bat roosts identified within structures, buildings and trees on site.
- Details of measures to avoid potential harm to bats, including details of pre-commencement surveys or checks where required.
- Details of measures to mitigate the impacts upon bats, including details of the design and location of replacement roosts appropriate to the species and nature of the roosts identified.
- Details of timing, phasing and duration of construction activities and conservation measures.

The Bat Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that an approved species Conservation Plan is implemented, which protects species affected by the development.

Condition: Bat Conservation Plan (*Outline application*)

No development, including site clearance shall commence until a Bat Conservation Plan has been submitted to and agreed in writing by the Local Planning Authority and shall include:

- Details of impacts (direct and indirect) from reserved matters works upon any bat roosts identified within structures, buildings and trees on site.
- Details of measures to avoid potential harm to bats, including details of pre-commencement surveys or checks where required.
- Details of measures to mitigate the impacts upon bats, including details of the design and location of replacement roosts appropriate to the species and nature of the roosts identified.
- Details of timing, phasing and duration of construction activities and conservation measures.

The Bat Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that an approved species Conservation Plan is implemented, which protects species affected by the development.

Condition: Otter Conservation Plan (*full application*)

An Otter Conservation Plan for the full planning application for the highways and bridge works should be provided which shall include:

- Details of suitable features to be included in the design of the new road bridge to ensure otter will be able to pass under the road safely, particularly at times of high water level.
- Details of protective measures to prevent incidental killing, injuring or capture of otters during construction.
- An assessment of the impacts of the proposals upon otter. This should consider direct and indirect impacts and address the construction and operational phases. Clarification of the extent, distribution and structure of existing habitat; habitat lost, habitat to be retained, enhanced, and any habitat to be created; and an assessment

of their condition and value for otter. A plan should identify these areas at an appropriate scale.

The Otter Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that an approved species Conservation Plan is implemented, which protects species affected by the development.

Condition: Otter Conservation Plan (*Outline application*)

An Otter Conservation Plan should be provided which shall include:

- A plan of the vegetated buffer to be retained alongside the river showing the width of the buffer, extent and location of habitat to be retained and created.
- Measures to protect the buffer from human disturbance.
- Details of protective measures to prevent incidental killing, injuring or capture of otters during construction.
- An assessment of the impacts of the proposals upon otter. This should consider direct and indirect impacts and address the construction and operational phases. Clarification of the extent, distribution and structure of existing habitat; habitat lost, habitat to be retained, enhanced, and any habitat to be created; and an assessment of their condition and value for otter. A plan should identify these areas at an appropriate scale.
- Details of initial aftercare (if new habitat is to be created) and ongoing management proposals for the long-term maintenance of retained/created vegetation along the river bank as suitable for otter.

The Otter Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that an approved species Conservation Plan is implemented, which protects species affected by the development.

Condition: Lighting Scheme (*full and outline applications*)

A Lighting Scheme is to be submitted. The scheme is to include:

- Details of the siting and type of external lighting to be used.
- Drawings setting out light spillage in key sensitive areas that demonstrate that the River Ely and associated buffer and the woodland surrounding the site shall be unlit by external lighting and be maintained as dark corridors.
- Details of lighting to be used both during construction and operation.

The lighting shall be installed and retained as approved during construction and operation.

Justification: A lighting plan should be submitted, to ensure lighting details are agreed prior to installation and to reduce the impacts of lighting in the interest of protected species, including bats and otters, the habitats and the commuting corridors along the Western boundary of the site and the River Ely.

We request that the following informative is attached to any planning permission granted by your Authority:

Warning: A European protected species (EPS) Licence is required for this development.

This planning permission does not provide consent to undertake works that require an EPS licence.

It is an offence to deliberately capture, kill or disturb EPS or to damage or destroy their breeding sites or resting places. If found guilty of any offences, you could be sent to prison for up to 6 months and/or receive an unlimited fine.

To undertake the works within the law, you can obtain further information on the need for a licence from Natural Resources Wales on 0300 065 3000 or at

<https://naturalresources.wales/permits-and-permissions/species-licensing/when-you-need-to-apply-for-a-protected-species-licence/?lang=en>.

Development should not be commenced until the Applicant has been granted a licence by Natural Resources Wales pursuant to Regulation 55 of the Conservation of Habitats and Species Regulations (2017) authorizing the specified activity/development to go ahead.

We may wish to discuss aspects of the proposed bat mitigation with the applicant in more detail at the EPS licence application stage. Please note that any changes to plans between planning consent and the EPS licence application may affect the outcome of the licence application.

Pollution Prevention

Condition 5: Construction Environmental Management Plan

No development, including site clearance, shall commence until a Construction Environmental Management Plan (CEMP) for the new bridge has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed;
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of

dust control measures; measures to control light spill and the conservation of dark skies.

- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan, with particular attention paid to silt mitigation measures.
- Water Quality Monitoring Plan - to include:
 - Details of monitoring methods
 - Frequent assessment of the visual water quality, particularly whilst carrying out bridgework, or working in or near the watercourse.
 - Instructions to notify NRW in the event of a pollution being caused.
 - A requirement to stop work and review further measures in the event that existing pollution mitigation is not effective.
 - Details of triggers for specific action and any necessary contingency actions, for example the need to stop work, introduction of drip trays, make use of spill kits and shut-off valves.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details.
- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Justification: A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction.

Biosecurity Risk Assessment

Condition 6: No development or phase of development, including site clearance, with the potential to impact on Japanese knotweed or Himalayan balsam shall commence until a site wide Biosecurity Risk Assessment has been submitted to and approved in writing by the Local Planning Authority. The risk assessment shall include measures to control, remove or for the long-term management of Japanese knotweed and Himalayan balsam during site-clearance, construction and operation. The Biosecurity Risk Assessment shall be carried out in accordance with the approved details.

Justification: To ensure that an approved Biosecurity Risk Assessment is implemented, to secure measures to control the spread and effective management of invasive non-native species at the site.

Land Contamination

Condition 7 - Land affected by contamination

No development shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:
 - o all previous uses
 - o potential contaminants associated with those uses
 - o a conceptual model of the site indicating sources, pathways and receptors
 - o potentially unacceptable risks arising from contamination at the site
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification: To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development, as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

Condition 8 - Contamination verification report

Prior to the occupation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification: To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated prior to occupation or operation. To minimise the risks to both future

users of the land and neighbouring land, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Condition 9- Unsuspected contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks. A site investigation may not uncover all instances of contamination and this condition ensures that contamination encountered during the development phase is dealt with appropriately.

Condition 10- Surface water drainage

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Justification: To prevent both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water pollution.

Condition 11 - Piling

No development shall commence until details of piling or any other foundation designs using penetrative methods sufficient to demonstrate that there is no unacceptable risk to groundwater have been submitted to and approved in writing by the Local Planning Authority. The piling/foundation designs shall be implemented in accordance with the approved details.

Justification: Piling/foundation details should be submitted to ensure there is no unacceptable risk to groundwater during construction and methods/design are agreed prior to the commencement of development or phase of development.

Informative / advice to applicant:

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the [CL:AIRE Definition of Waste: Development Industry Code of Practice](#). This

voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not *rule out the potential for the proposed development to affect other interests*. We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Flood Risk Activity Permit – advice for the applicant

You will need to apply for Flood Risk Activity Permit from NRW. All Permit applications must be approved prior to the commencement of any works and due to the stand-alone nature of the legislation must be sought alongside any granted planning permission.

Please contact Carl Llewellyn at carl.llewellyn@cyfoethnaturiolcymru.gov.uk to discuss the Flood Risk Activity Permit requirements. Please see our website for further details: <https://naturalresources.wales/permits-and-permissions/flood-risk-activities/flood-risk-activity-permits-information/?lang=en>

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Mrs Claire McCorkindale

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales

Appendix 5 – PPW11’s Placemaking Appraisal Framework and Placemaking Outcomes



PPW Placemaking Outcomes	Strategic & Spatial Choices	Active & Social	Productive & Enterprising	Distinctive & Natural	Globally Responsible	Prosperous	Resilient	Healthier	More Equal	Cohesive Communities	Vibrant Culture	Commentary
Maximising Environmental Protection and Limiting Environmental Impact												
Has resilient biodiversity and ecosystems	●	●		●	●		●	●	●	●		Whilst the site does not have any international or national biodiversity designations the Leckwith Woods, Factory Woods and the River Ely are all designated locally as a Site of Importance for Nature Conservation (SINC). The site is however brownfield and the ecological surveys confirm that the site itself mainly comprises cleared and levelled land meaning that the great majority of the habitats within the site either comprise bare ground, hardstanding or cleared and levelled ground supporting only secondary ruderal vegetation and some scrub. The fringes of the site support broadleaved semi-natural woodland to the south-west and a very narrow belt of scrub and ruderal vegetation along the north-eastern fringe where it abuts the adjacent river. A number of protected species have been identified within and around the site but mitigation measures are incorporated within the development proposals to ensure that the proposed development would not have an adverse impact in terms of ecology and biodiversity.
Has distinctive and special landscapes	●	●		●	●		●	●	●	●	●	The site is located within the Cwrt-yr-Ala Basin SLA and overlaps with a small area of the Factory Wood SINC and lies adjacent to both Leckwith Woods and the River Ely which are both designated as a SINC respectively. These, however, are local designations only and the proposed redevelopment of the site has been designed as sensitivity as possible to have no direct impact on them.
Has integrated green infrastructure	●	●	●	●	●	●	●	●	●	●	●	The proposals include both formal and informal green infrastructure and recreational space to promote a well-connected and cohesive community. Green fingers along with sustainable drainage systems (SuDS) also form an integral element of the site's green infrastructure strategy.
Has appropriate soundscapes	●			●	●		●				●	Due to the site's close proximity to the A4232, it is acknowledged that there is an identified risk of high external noise levels being experienced across the development site. The building massing and site layout has however been designed to provide acoustic screening to amenity areas and lower noise levels across the site to be within recommended levels. The acoustic design of the building facades will be further developed within the development proposals so the acoustic performance can be further improved.
Reduces environmental risks	●	●		●	●	●	●	●	●	●		It is known that the site has been utilised for a number of industrial and commercial uses from pre-1880s to present day. Mitigation measures for the potential effects identified are generally inherent to the site and will be incorporated into the detailed design (such as drainage design) and CEMP required for the Construction Phase. Should contamination sources be identified, mitigation measures will include the implementation of a remedial scheme in accordance with a site-specific remediation strategy; mitigation measures may, for example, include the provision of a capping layer across garden and landscaped areas. The development proposals however seek to 'clean up' and make use of an existing, essentially under-utilised, and unsightly site.
Manages water resources	●	●	●	●	●	●	●	●	●	●		The site lies within Flood Zone C1 and is, therefore, served by significant infrastructure including flood defences. The site has, however, been identified as being at risk of flooding from the Pontsticill (Taf Fechan) Reservoir were the latter to fail catastrophically. A Flood Consequences Assessment (FCA) including detailed hydraulic modelling and a SAB Compliant Drainage strategy have been submitted in support of the development. From the work undertaken to date it is considered that the site is suitable, in drainage and flooding terms, to accommodate a well designed and sustainable form of residential development which is TAN15 compliant. NRW Raise no objections to the proposals on the basis of the flood modelling work and conclusions of the FCA.

Has clean air	●	●	●	●	●	●	●	●	●	●	●	The site is not located within an Air Quality Management Area and the use of best practice construction methods during construction will ensure no air quality issues will arise during that phase of the development.
Reduces overall pollution	●	●	●	●	●	●	●	●	●	●	●	The development is not anticipated to result in pollution, but best practice construction methods will be adopted to ensure no issues arise during the construction phase of the development. The site is also positioned to take advantage of the nearby services and sustainable transport routes. As such, the site is ideally situated to reduce car dependency and reduce overall pollution.
Is resilient to climate change	●	●	●	●	●	●	●	●	●	●	●	See points above regarding access to services, facilities and public transport. The residents of the site will therefore not be reliant on the private car. The site's flood mitigation measures and drainage strategy has been designed to be climate resilient in accordance with standards.
Has distinctive and special historic elements	●	●	●	●	●	●	●	●	●	●	●	The proposals provide a long-term future for 'Old Leckwith Bridge' which is a Grade II* listed bridge and Scheduled Ancient Monument. Currently, the bridge provides the only vehicular access to the site, which, being single-track, would be insufficient to serve the proposed development. Furthermore, the bridge is at risk of damage from heavy traffic and as such it is intended to be a pedestrian and cycle route only for the proposal. The development is therefore considered to have a beneficial impact in terms of the site's historical assets.
Facilitating Accessible and Healthy Environments												
Has accessible and high quality green space	●	●	●	●	●	●	●	●	●	●	●	As stated above, the proposals include both formal and informal green infrastructure and recreational space to promote a well-connected and cohesive community. Specifically, the site will benefit from a landscape strategy which focuses on the provision of green fingers which seek to integrate the sites blue and green infrastructure whilst incorporating a Suds network throughout the site and making the most of the site's woodland setting.
Is accessible by means of active travel and public transport	●	●	●	●	●	●	●	●	●	●	●	The site benefits from existing provision for pedestrians and cyclists in the locality, including shared footways/cycleways on both sides of the B4267 Leckwith Road, a comprehensive network of crossing facilities, and neighbouring off-road routes. Employment areas and a range of local facilities are located within walking and cycling distance of the site. Regular bus services are accessible from bus stops located on the B4267 Leckwith Road. The site itself is also only 2.5km to the southwest of Cardiff City centre.
Is not car dependent	●	●	●	●	●	●	●	●	●	●	●	As set out above, the subject site is considered highly accessible via means of active travel and public transport and also situated in close proximity to a range of services and facilities. There are many local facilities, including shops, schools, medical facilities, leisure and sports facilities and commercial premises, as well as bus stops within walking/cycling distance of the site.
Minimises the need to travel	●	●	●	●	●	●	●	●	●	●	●	As set out in the two rows above, the site will clearly minimise the need to travel as far as practicable.
Provides equality of access	●	●	●	●	●	●	●	●	●	●	●	The site is accessible by all modes of transport and the development will include affordable housing units which means that the dwellings must be DQR compliant and, as such, will be accessible to all.
Feels safe and inclusive	●	●	●	●	●	●	●	●	●	●	●	The indicative masterplan for the development has been designed to ensure privacy, security and limits overlooking and disturbance. The development seeks to deter criminal activity and anti-social behaviour by minimising opportunities to commit crime or to impact negatively on the quality of life of those using the development with communal areas overlooked throughout thereby providing natural surveillance. The development will therefore feel safe and inclusive.
Supports a diverse population	●	●	●	●	●	●	●	●	●	●	●	The development will provide a mix of properties, including an element of affordable homes. It is therefore considered that it will, because of the housing mix, have the potential to be occupied by a wide range of persons with varying needs.

Has good connections	●	●			●	●	●	●	●	●	●	As previously identified, the site is accessible with existing footways and the new pedestrian/cycle link providing Active Travel opportunities and is within walking/cycling distance of facilities and services as well as local bus stops.
Has convenient access to goods and services	●	●			●	●	●	●	●	●	●	As above, there are many local facilities, including shops, schools, medical facilities, leisure and sports facilities and commercial premises, as well as bus stops within walking/cycling distance.
Promotes physical and mental health and well being	●	●		●	●	●	●	●	●	●	●	The provision of green infrastructure will help to encourage active lifestyles and create a positive environment to the benefit of physical and mental-health and well-being. The development also seeks to embrace its unique location sitting alongside the river and its woodland back drop, the location of which helps to promote a sense of well-being.
Making Best Use of Resources												
Makes best use of natural resources	●		●	●	●	●	●	●	●			The site is brownfield and the proposed development seeks to make use of an existing, essentially under-utilised, and unsightly site. The development will use the site far more efficiently than at present; it will not be visually conspicuous; and it will be constructed to provide a high standard of fabric efficiency and to accommodate a low carbon heating system.
Prevents waste	●		●	●	●	●	●	●	●			Best practice construction techniques will be utilised in order to minimise waste.
Priorities the use of previously developed land and existing buildings	●	●			●	●	●	●	●	●	●	The site is an existing under-utilised brownfield site bridging the boundary between an urban area of Cardiff and a rural area of the Vale of Glamorgan. The site is therefore not located in the open countryside and it is also influenced by a number of contextual features such as the River Ely, the proximity of the A4232, the impact of the overbridge and the B4267 (Leckwith Road) that it carries, and the immediate hillside and woodland around the site. Additionally, the site is very well related to large-scale urban features such as The City of Cardiff Football Stadium, the associated Retail Park, and the Athletics Stadium. Despite that its condition is obviously not considered to contribute towards urban sprawl, a factor that will not be altered by the development proposal.
Unlocks potential and regenerates	●	●	●	●	●	●	●	●	●	●	●	An integral part of the redevelopment scheme includes the replacement of the existing B4267 Leckwith Road which is in a critical state of disrepair and in need of urgent repair or redevelopment. Without such repair or replacement it is likely that the bridge will have to be closed to traffic thereby rendering the B4267 inaccessible from the east, therefore cutting off a significant access route between main and rural settlements within the Vale of Glamorgan and Cardiff. Therefore, the replacement of the existing B4267 Leckwith Road will ensure that all existing enterprises, tourism, leisure and community facilities remain accessible from the east.
Is of high quality and built to last	●	●	●	●	●	●	●	●	●	●	●	The development will be built to a high quality standard.
Growing Our Economy in a Sustainable Manner												
Fosters economic activity	●	●	●			●	●	●	●	●	●	Short-term economic benefits will be achieved via the construction phase of the development. The increase of population once the development is occupied, coupled with its accessibility to local facilities and commercial outlets will also benefit the sustainability of those facilities. The replacement of the existing B4267 Leckwith Road will also ensure that all existing enterprises, tourism, leisure and community facilities remain accessible from the east.
Enables easy communication	●	●	●		●	●	●	●	●	●	●	Communication is not directly relevant to this residential development, but appropriate services will be easily provided for communications such as telephone and super fast/fibre broadband due to its location within the existing settlement.

Generates its own renewable energy	●	●	●	●	●	●	●	●	●	●	●	There is no specific renewable energy element to this residential scheme. The design and build of the new residential dwellings will however meet all relevant building standards in respect of energy efficiency and carbon neutrality.
Is vibrant and dynamic	●	●	●	●	●	●	●	●	●	●	●	The design of the development, housing mix and the creation of new areas of open space will foster activity and vibrancy within the development. The development also seeks to embrace its unique location sitting alongside the river and its woodland back drop.
Is adaptive to change	●	●	●	●	●	●	●	●	●	●	●	The development will be designed to lifetime home standards and will therefore be adaptive to change.
Embraces smart and innovative technology	●	●	●	●	●	●	●	●	●	●	●	Whilst not directly relevant to this residential development, appropriate facilities will be easily provided for digital/internet communications due to its location within the existing settlement.
Creating and Sustaining Communities												
Enables Welsh language to thrive	●	●	●	●	●	●	●	●	●	●	●	The development will be of no detriment to the Welsh language.
Has appropriate development densities	●	●	●	●	●	●	●	●	●	●	●	The development will provide 250 units on an 8.9 hectare site which also includes the area required for the replacement road bridge. Considering the net developable area which stands at approximately 3.89 ha the site has a development density of 64.2 dwellings per hectare. This is considered appropriate given the context of the development site, proposed development blocks and to ensure an efficient use of land.
Has homes and jobs to meet society's needs	●	●	●	●	●	●	●	●	●	●	●	The proposed development will provide a range of choice of house sizes and types to meet the needs of the community.
Has a mix of uses	●	●	●	●	●	●	●	●	●	●	●	The site will replace a vital element of highways infrastructure alongside residential development whilst enhancing an existing under-utilised brownfield site.
Offers cultural experiences	●	●	●	●	●	●	●	●	●	●	●	The development is a housing scheme for which the consideration of cultural experiences is not directly relevant. However, a number of initiatives to promote the use of the Welsh language could be integrated into the scheme including Consideration will also be given to street names, signage and householder literature.
Has community based facilities and services	●	●	●	●	●	●	●	●	●	●	●	As stated previously, the site is very well related to large-scale urban features such as The City of Cardiff Football Stadium, the associated Retail Park, and the Athletics Stadium. The site will also provide a new areas of open space and seeks to embrace its unique location sitting alongside the river and its woodland back drop.