
Cardiff Gate International Business Park

Planning Statement

November 2021

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EXECUTIVE SUMMARY

This Planning Statement is produced on behalf of Cardiff Gate International Business Park Ltd in support of the following proposal:

"Outline planning application for vehicular, pedestrian and cycle accesses, residential (Use Class C3), flexible food and drink/retail (Use Class A1/A3), offices (Use Class B1), car dealership (Sui Generis Use), car parking and reconfigured highway arrangements and associated public open space, drainage, landscaping and engineering works."

The application site relates to the area of a proposed Bus, Pedestrian and Cycle Connection linking the North East Cardiff Strategic Site to the Business Park which egresses through Becks Court along with vacant development plots at Plot 12 and 14 and adjacent highway infrastructure.

The proposal would broaden the mix of uses within the Business Park as part of a high quality, mixed-use scheme on vacant development plots in a sustainable location.

The scheme would bring vacant/underused land into beneficial use with associated regeneration benefits, would promote the efficient use of land, make a positive contribution to housing supply, and deliver a resource efficient and climate responsive design. The scheme would help combat climate change by delivering landscape and SuDS proposals.

The provision of more active uses along the newly created sustainable transport link to the North East Cardiff Strategic Site should all be warmly welcomed, as with the provision of landscape, public realm and highway improvements within the Business Park. These will help ensure the Strategic Site connects successfully with the Business Park and create a vibrant, landscaped 'place' with significantly enhanced biodiversity befitting the site's location, in direct contrast to the existing vacant development plots.

The proposals have been assessed against local and national policies and guidance and are considered to be policy compliant with all material factors, policy implications and issues raised through the pre-application engagement with the Council having been satisfactorily addressed.

It is, therefore, considered that the proposals are an acceptable development which meets the requirement of Section 38(6) of the 2004 Act and the Well-being of Future Generations (Wales) Act 2015 and therefore should be approved.

1.0 INTRODUCTION

1.1 This Planning Statement is produced on behalf of Cardiff Gate International Business Park Ltd in support of an outline planning application for the following development:

"Outline planning application for vehicular, pedestrian and cycle accesses, residential (Use Class C3), flexible food and drink/retail (Use Class A1/A3), offices (Use Class B1), car dealership (Sui Generis Use), car parking and reconfigured highway arrangements and associated public open space, drainage, landscaping and engineering works."

1.2 The planning application is supported by the following package of plans, surveys and assessments:

- Site Location Plan;
- Plans and drawings;
- Design and Access Statement;
- Ecology Report;
- Arboriculture Report;
- Employment/Office Market Report;
- Green Infrastructure Report;
- Drainage Strategy; and
- Transport Assessment.

1.3 The remainder of this Statement is structured as follows:

- Chapter 2: Site Context;
- Chapter 3: Proposed Development;
- Chapter 4: Planning History;
- Chapter 5: Planning Policy Context;
- Chapter 6: Planning Assessment; and
- Chapter 7: Conclusion.

2.0 SITE CONTEXT

The Site and Surroundings

- 2.1 The Site is located within the Cardiff Gate International Business Park (CGIBP) which lies within the existing urban area of Cardiff, approximately 7km (direct route) to the north-east of the City Centre in the Pontprennau area of the City. The Business Park comprises a mix of commercial and employment uses and contains largely brick clad buildings of modern design and function. Due to its location within the existing urban area of the City, the site is adjoined by existing development within the immediate surrounding area.
- 2.2 The area to the west of the Business Park, whilst currently undeveloped, comprises the proposed employment element of the North East Cardiff Strategic Site allocated within the Council's Local Development Plan (LDP) (discussed later) which is the subject of a pending planning application ref: 19/02330/MJR. The Council have a requirement (as set out in the LDP – discussed later) for a public transport link to be provided from the Strategic Site to the Business Park.
- 2.3 The proposals relate to the following elements within the Business Park:
- Bus, Pedestrian and Cycle Connections linking the Strategic Site F to the Business Park and through Becks Court.
 - Plot 12: comprises a vacant development plot of approximately 4.04 hectares. The land does not benefit from frontage to Malthouse Avenue and is undulating, predominantly sloping down towards the south & east. It is free of vegetation and hedgerows and trees bound the site to the south, east & west. Existing office buildings and associated areas lie beyond the north, west and parts of the eastern boundaries, with St Mellons Road and the Pontprennau housing estate to the south. A public right of way footpath runs along the eastern boundary from Malthouse Avenue to St Mellons Road.
 - Plot 14: comprises a vacant development plot of approximately 1.46 hectares. The land is undulating, predominantly sloping up towards the west. An earth bund and hedgerows bound the site to the west and the remainder of the site is clear of any vegetation. An electricity substation lies to the north and Parkwall Road lies beyond to the west. Woodsy Close lies to the east. Overhead electricity lines and pylons and a surface level car park are located to the south.

- Highways land at Malthouse Avenue and Woodsy Close is included to facilitate access and to deliver sustainable transport improvements, including a new pedestrian and cycleway.

Public Transport

- 2.4 The site is accessible by public transport with bus stops located within the Business Park on Malthouse Avenue, which provides frequent services to Cardiff City Centre.
- 2.5 The nearest train station is located approximately 6.5km away at Llanishen, which provides services to Penarth, Bargoed & Rhymney and Cardiff Central and Cardiff Queen Street approximately every 10 minutes.

Community Facilities

- 2.6 The site has good access to a wide range of local facilities, services and employment opportunities. Pontprennau Primary School lies approximately 400m to the south of the site, within safe walking distance. The site is located approximately 4.5km away from St Bernadette's Primary School and 4.6km from Corpus Christi High School. Further education facilities are proposed as part of the adjacent North East Cardiff Strategic Site including a further primary school and secondary school.
- 2.7 In terms of healthcare facilities, the site is located approximately 400m walk away from Pontprennau Dentalcare, Pontprennau Medical Centre and Pontprennau Pharmacy.
- 2.8 Main food and non-food retail facilities are located within 500m of the site at Cardiff Gate Retail Park which contains a Supermarket, coffee shop, gym and a range of other retail stores. Additionally, within CGIBP is a hotel, pub, crèche, private doctor/dental surgeries and motorway services with a petrol filling station, coffee shop and convenience store.

Parks and Leisure Facilities

- 2.9 The site is accessible to a wide range of parks and leisure facilities with a playing field and tennis court located on Heol Pontprennau approximately 400m walk away. In addition, the site lies approximately 400m walk from Pontprennau Community Centre and 400m walk from Pontprennau Community Church Centre.

Built Heritage

- 2.10 The site is not located within or within proximity to any World Heritage Sites, Registered Parks and Gardens or Registered Battlefields, Scheduled Monuments or Listed Buildings.

Flood Risk & Air Quality

- 2.11 According to Natural Resources Wales Flood Map for Planning (which will replace the current Development Advice Map from 1 December), the site is wholly located in Flood Zone 1, which means there is 'less than 1 in 1000 (0.1%) (plus climate change) chance of flooding in a given year'.
- 2.12 The site is not located within an Air Quality Management Area (AQMA).

3.0 PROPOSED DEVELOPMENT

3.1 The proposed development is submitted in outline form and seeks permission for the following:

- Bus, pedestrian and cycle connections to the adjacent North East Cardiff (West of Pontprennau) LDP Strategic Site (allocated under Policy KP2 (F)) to the west;
- Bus egress through Becks Court;
- Plot 12: residential development (Use Class C3); and
- Plot 14: mixed-use development – flexible food and drink/retail (Use Class A1/A3), offices (Use Class B1) and car dealership (Sui Generis Use).

3.2 A Development Brief for the wider Business Park is also being prepared. The Development Brief will provide an important update to the existing Brief (which is some 25 years old) to reflect current site conditions, the Council's requirement for a bus link to the Business Park and broadening of uses and to maximise the placemaking benefits associated with the sustainable transport link proposed.

4.0 PLANNING HISTORY

4.1 Relevant notable planning history is summarised below:

- 88/226 – Outline application for B1 and ancillary uses (wider site) – Granted (with Condition 9 specifying the requirement for a Development Brief);
- 00/632N – Proposed landscaping to existing boundaries (wider site) – Granted;
- 02/00816/N – Office Development (Plots 11, 12, 14 & 15) – Granted;
- 07/02476/E - Three Storey Office Units and Convenience Retail Development with Associated Car Parking (Southern part of Plot 8) – Granted; and
- 16/01582/MJR - Proposed Development of up to 150 Homes, Provision of New Vehicle Access, Pedestrian/Cyclist Routes, Public Open Space, Landscaping Drainage and Associated Works (Plot 12) – Refused due to *'fail[ure] to justify the loss of this Strategic Employment Land'*.

4.2 Land to the west forms part of the North East Cardiff (West of Pontprennau) LDP Strategic Site (allocated under Policy KP2 (F)). This is subject to an undetermined planning application as follows:

- 19/02330/MJR: An Outline Application (Appearance, Landscaping, Layout and Scale Reserved) for a Mixed Use Development of up to 2,500 New Homes, to include Affordable Housing; Land for Employment Use (B1); District Centre and Mixed Use Areas Accommodating Uses within Classes A1-A3 (Shops; Financial and Professional Services; and Food And Drink Outlets), B1 (Business), C1 (Residential Institutions, including Care Accommodation), C3 (Dwellings), D1 (Non-Residential Institutions, including Medical and Health Services, Creches, Library, Conference Centre, Community Centres and Places of Worship), D2 (Assembly and Leisure, including Indoor Sports Facilities); one 2 FE Primary School and Land for a Secondary School (10 FE & 6th Form) comprising a Total of 10 Hectares; Green Infrastructure including Formal and Informal Open Space comprising Green Corridors, Amenity Green Space, Play Areas, Semi-Natural/Natural Open Space, Woodland, Allotments/Community Orchards and Civic Spaces and Surface Water Attenuation Features; Highway, Cycle and Pedestrian Routes including Partial Diversion/Creation Of Public Rights Of Way; Car Parking; Drainage and Utilities Infrastructure, including Diversion of the 132kv and 11 Overhead Electricity Transmission Lines Traversing the Site and Removal of Pylon Structures; Engineering Works including Ground Remodelling; Demolition Site Reclamation and Removal of Structures; Approval is also sought for the formation of

New Accesses from Lisvane Road, Ty Draw Road, and Heol Glandulais/St. Mellons Road – Undecided

- 4.3 Plot 8 of Cardiff Gate Business Park is currently subject to an undetermined planning application for the development of a car dealership (Sui Generis Use) and associated works.

Pre-Application Engagement

- 4.4 Pre-application dialogue has taken place with the Council over the course of 2020 and 2021 (CCBC Ref: PA.20/00067/MJR) to help inform the development proposal and assessment work undertaken in support of the planning application.
- 4.5 In terms of planning policy it was identified that the principle of development for the proposals is accepted on the basis of the justification put forward by the Applicant – see extract below:

"Unlike the previous appeal decision for the residential development of Plot 12, this proposal covers Plot 8b, Plot 14 and Plot 12 for a mix of uses, including employment uses and paragraph 5.50 of the supporting text to policy EC3 gives priority to mixed use development where alternative land uses are considered appropriate. In addition, the proposed residential development of Plot 12 allows for a commercial plot on the road frontage.

On balance, given the length of time the remaining plots have been vacant despite extensive marketing, the wider area and the mix of uses that are proposed, including the provision of employment opportunities on land protected for employment purposes, it would be difficult to justify a land use policy concern in this instance. Furthermore, the proposals would enable the provision of an active travel/bus links to Strategic Site KP2 (F) North East Cardiff.

Notwithstanding this assessment, the preferred design concept for Plot 14 is for commercial development and it is likely financial contributions would be sought to offset the loss of employment land were Plot 14 to be for 100% residential."

- 4.6 Changes were made to the proposals to enhance their placemaking benefits and address comments from the Council's Urban Design Officer. All comments have now been addressed and are reflected in the submission. An extract of the Urban Design Officer's response to the pre-app is below:

"Thanks for consulting me on this. I am really pleased with it. The applicant has pretty much covered off all of the issues and opportunities that we had discussed, and responded very positively: connectivity, frontages and suggestions for future plot development, green corridors retained and developed, lane character intact, some reasonable notion of a housing layout.

*I would request that the consent conditions future development to be "broadly in accordance with the principles and layout presented on approved drawing 9310 " so that we retain some flexibility but can fall back on this work as necessary.
I am particularly pleased to see reference to bus and cycle connectivity and the indicative highway and junction improvements shown. It would make a huge difference to the quality of the connectivity and the character of the place, without reducing the opportunity to access by traffic: detail to resolve in due course - I understand"*

- 4.7 The proposals have also been the subject of an EIA Screening Opinion request which confirmed that the Council do not consider that the proposals require the submission of an Environmental Statement to accompany a planning application (Ref: SC/21/00003/MJR).

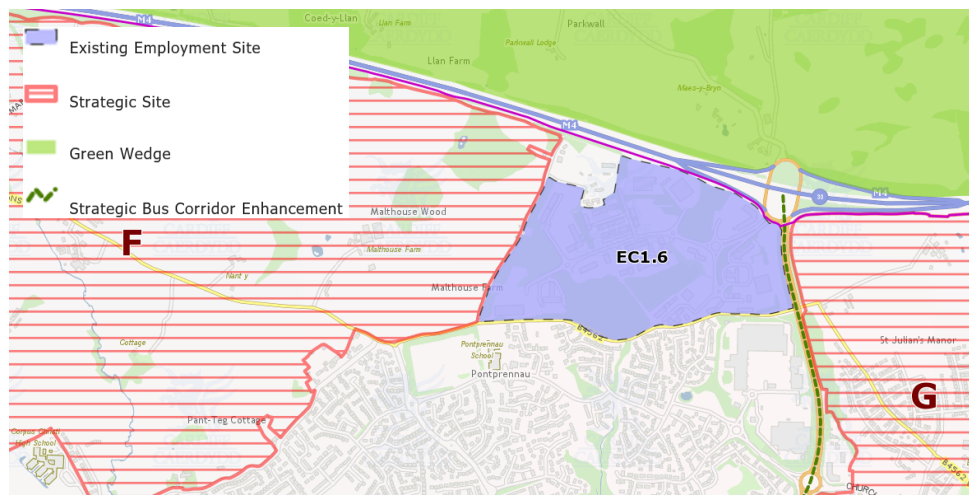
5.0 PLANNING POLICY CONTEXT

Development Plan

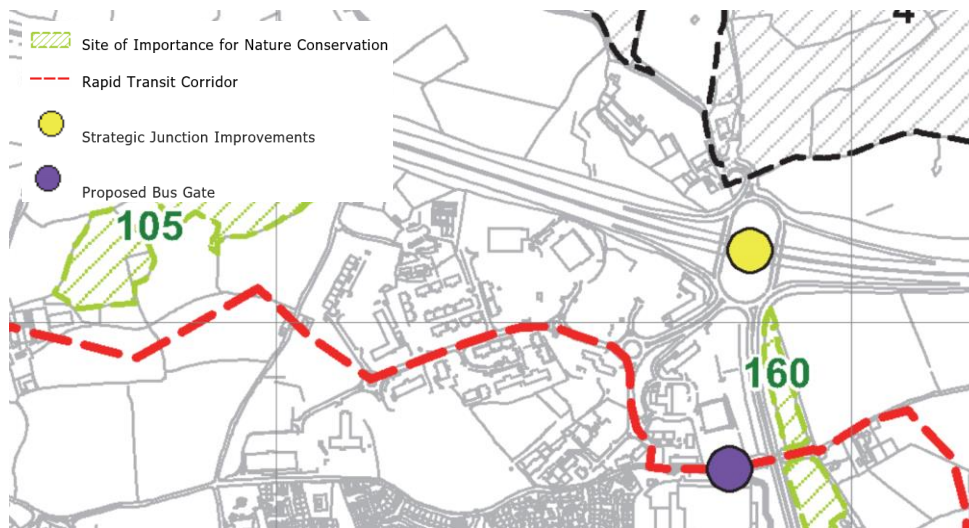
5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory Development Plan for the area comprises the Cardiff Local Development Plan (LDP) which was adopted in 2016 and covers the period 2006-2026 along with the national development framework 'Future Wales: The National Plan 2040' (February 2021).

5.2 Relevant policies within the LDP include:

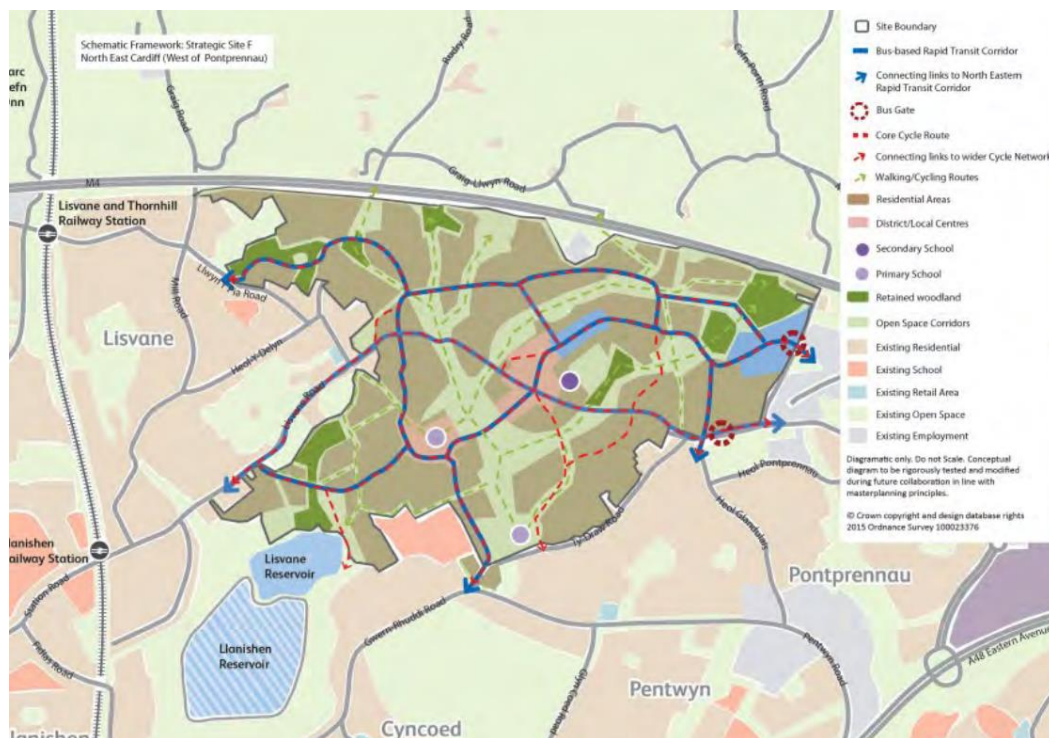
- Policy KP5 (Good Quality and Sustainable Design);
- Policy KP8 (Sustainable Transport);
- Policy EC1 (Existing Employment Land);
- Policy EC3 (Alternative Use of Employment Land or Premises);
- Policy T5 (Managing Transport Impacts);
- Policy EN13 (Air, Noise, Light Pollution and Land Contamination);
- Policy W2 (Provision for Waste Management Facilities in Development); and
- Policy KP2 (F): North East Cardiff (West of Pontprenau).



LDP Proposals Map Extract



LDP Constraints Map Extract



Strategic Site F: Schematic Framework (extracted from LDP)

5.3 Future Wales policies with immediate relevant Development Management Implications include:

- Policy 2 (Shaping Urban Growth and Regeneration – Strategic Placemaking) – sets out strategic placemaking principles of creating a mix of uses, providing a variety of housing types and tenures, building places at a walkable scale, increasing population density at densities that can support public transport and local facilities, establishing a permeable network of streets, promoting a plot-based approach to development and integrating green infrastructure. Supporting text notes that new developments in

urban areas should aim to have a density of at least 50 dwellings per hectare, with higher densities in more central and accessible locations.

- Policy 6 (Town Centre First) states that significant new commercial, retail, education, health and leisure and public services must be located within town and city centres. The supporting text notes that the policy applies to facilities of a significant scale.
- Policy 9 (Resilient Ecological Networks and Green Infrastructure) – States that in all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals.
- Policy 12 (Regional Connectivity) - For non-residential developments LPAs should seek a minimum of 10% of car parking spaces to have electric charging points.
- Policy 13 (Supporting Digital Communications) - In relation to digital infrastructure new developments should include the provision of Gigabit capable broadband infrastructure from the outset.
- Policy 16 (Heat Networks) - Large scale mixed-use development (100 or more dwellings or 10,000 sqm) should, where feasible, have a heat network with a renewable / low carbon or waste heat energy source. Planning applications for such development should prepare an Energy Masterplan to establish whether a heat network is the most effective energy supply option and, for feasible projects, a plan for its implementation.

5.4 Relevant national planning policy and guidance is set out below:

- Planning Policy Wales (11th Edition, 2021);
- Development Management Manual;
- Technical Advice Note (TAN) 5: Nature Conservation and Planning;
- TAN 11: Noise;
- TAN 12: Design; and
- TAN 23: Economic Development.

5.5 Relevant Supplementary Planning Guidance prepared at the local level is set out below:

- Managing Transportation Impacts (Incorporation Parking Standards) (2018);
- Safeguarding Business and Industrial Premises (2017); and

- Waste Collection and Storage Facilities (2016).

6.0 PLANNING ASSESSMENT

Principle of Development

- 6.1 The Business Park is located within the defined settlement boundary of the adopted LDP and is designated as existing employment land (EC1.6: Cardiff Gate Business Park, which enjoys an extant permission for B1 development). The proposal is therefore assessed against Policies EC1, EC2 and EC3 of the Council's LDP. The Development Plan policy framework seeks to protect existing employment sites for B1 and B2 (ancillary) Use Class employment unless justification can be made.
- 6.2 The proposals broaden the mix of uses within the Business Park in order to deliver a more animated frontage along the proposed sustainable transport link to the adjacent North East Cardiff Strategic Site to the west.
- 6.3 The proposals at Plot 12 would provide a range and choice of housing in an area which is sustainably located and accords with the broader spatial strategy of the LDP.
- 6.4 The proposals more broadly 'enable' the provision of an active travel and bus link to the adjacent North East Cardiff Strategic Site. Broadening the mix of uses within the Business Park would provide wider placemaking benefits and more active frontage along this route, subject to accommodating the utilities/infrastructure constraints of the site. The proposed link delivers one of the policy requirements of the Strategic Site and would assist in 'opening up' the B1 & B1(b)(c) employment land allocated within the Strategic Site. The proposed uses would also generate new jobs albeit that not of the proposed elements fall within Use Class B1. Any 'loss' of employment land within the Business Park should be considered in this context.
- 6.5 The car dealership element of the proposed development comprises a Sui Generis use, one which does not come under Use Class B1 or B2, however it is noted that the Council does not allocate sites for vehicle dealerships within the LDP and as such it is commonplace for such sites to be within areas allocated by the LPA for employment purposes.
- 6.6 Policy EC2 Provision of Complementary Facilities for Employees in Business, Industrial and Warehousing Developments identifies uses which could be considered complimentary services for employees in business, warehouse and industrial developments. The policy states that "in existing employment areas, change of use of existing premises will be considered for appropriate complementary facilities, including food and drink, leisure and

child-care". The proposed car dealership element of this site (Sui Generis Use) would not qualify as one of the complimentary uses identified within this policy, however vehicle dealerships operated by both Audi and Mercedes are located in the wider Business Park and have been operating in excess of five years and are considered acceptable within their surroundings.

- 6.7 Taking the above into consideration, although it is acknowledged that the proposed use does not pertain one of the identified complimentary uses identified as part of Policy EC2, the presence of existing vehicle dealerships would indicate that the proposal would sit well within its surroundings. The core function and character of the area as a business park will be retained and the development of car sales would generate further employment opportunities and support the vibrancy of the wider site.
- 6.8 Notwithstanding the above, balanced against the placemaking and economic benefits of the proposal is the fact that Plots 12 and 14 have laid vacant for a considerable period of time and therefore have not made any contribution to jobs or the economy. Paragraph 4.6.9 of TAN 23 recognises that in certain circumstances existing employment sites may reasonably be released for other uses, including where there are poor prospects of re-occupation for employment, there is market oversupply or land of equal or better quality is made available elsewhere (even where this is not within the local planning authority boundary).
- 6.9 Policy EC3 Alternative Use of Employment Land provides criteria against which proposals for the change of use of business and industrial land and premises will be assessed, and where alternative use of land will be considered appropriate. It is important to note that the criteria-based policy within Policy EC3 is subject to an 'or' test – that is that compliance with all criteria is not required in order for a proposal to accord with the policy. The Council clarified that there is inherent flexibility incorporated into the policy in LDP Hearing Statement 10: Employment and Retail:

*"b) Is Policy EC3 'Alternative use of Employment Land & Premises' sufficiently flexible? Yes. Whilst Policy EC3 (Alternative use of Employment Land and Premises) seeks to protect employment land and premises for appropriate uses, it is criteria based policy to assess the need to retain land and premises in employment use. The use of criteria to respond to proposals for the alternative use of employment land and premises which the plan seeks to protect enables the policy to incorporate flexibility. It is therefore considered **sufficiently flexible to ensure that sites and premises which have no realistic prospect of current or future employment use and/ or have suffered long term***

vacancy, despite being marketed for an appropriate period, will be considered for other types of development.” (emphasis added)

6.10 In considering the need to retain the land for business use (Policy EC3 Criterion iii), the plots have been actively marketed without success over a period of 23 years – over which time market conditions have fluctuated with there being periods of recession and growth. The submitted Employment/Office Market Report by Fletcher Morgan confirms that over the past 5-10 years there has been a significant shift in office demand towards the City Centre away from out of town locations in Cardiff and more broadly across the UK. Whilst there is limited demand for out of town office accommodation, any occupiers at Cardiff Gate Business Park clearly seek to capitalise on its proximity to the motorway with a need for sufficient car parking to accommodate car-based commuting.

6.11 In summary, marketing of the site has included:

- Advertisements in the national, regional and local press, the property press and specialist trade papers, on a regular basis throughout the agreed marketing timescale;
- Continuous inclusion on various agent’s website;
- Continuous and prominent advertisement on the site by an agent’s advertisement board on the site frontage to the highway;
- Circulation to other local property agents, specialist commercial agents and the Council by way of mail shots; and
- Referral to the local business community for consideration of its potential for reuse or redevelopment for employment use.

6.12 In respect of the length of time in which the site has been marketed, the Council’s Safeguarding Business and Industrial Land and Premises SPG states that ‘such marketing should normally be undertaken for a minimum of 12 months’. Given that there has continued to be limited interest in the entirety of the plot despite the continuous marketing of the property for a number of years, it is considered that this guidance requirement has been met and it has been demonstrated that the employment land is unviable and that there is a proven lack of demand. The marketing has been undertaken during period of growth and recession.

6.13 Paragraph 5.50 of the supporting text for Policy EC3 highlights that where alternative use of land is considered appropriate, priority is given to mixed-use development.

- 6.14 In considering the impact on the operating conditions of existing businesses (Policy EC3 Criterion iv), the proposed uses are compatible with adjacent B Use Class offices. The proposals will be of high-quality design with there being potential for more 'active' elements of the proposed buildings at Plots 12 and 14 being provided at the sites' frontage. They will therefore not detract from the visual amenity enjoyed by those at the Business Park.
- 6.15 The Council's Planning Policy Officers stated in their pre-application advice response that the principle of development is acceptable thereby confirming the above interpretation of policy and compliance with LDP policy EC3.

Sustainable Transport Linkages

- 6.16 The site is located to the east of Strategic Site F, which includes a requirement for a bus gate and connecting link to the North Eastern Rapid Transit Corridor through the business park. Through facilitating this link the proposals accord with the requirements of Policy KP2 (F), and will moreover help enable the delivery of the Strategic Site. The Council's aspirations for a further access into the Business Park do not align with the prevailing Development Brief for the Business Park – with the current Development Brief only allowing for a single point of vehicular access. The Development Brief is some 25 years old) and therefore a refreshed Development Brief is currently being prepared to guide the fundamental shift at the site and this important next phase of development.

Sustainability and Transport

- 6.17 The site is sustainably located and well connected to a range of day-to-day facilities and services by modes of transport other than the car. There are high quality, extensive pedestrian routes in its vicinity, as well as the good provision of cycling infrastructure.
- 6.18 It is proposed that a bus link (with bus gate) and active travel corridor be provided from the Strategic Site to the west via Woodsy Close. The movement corridor will run through the Business Park and egress via Becks Court. This will create a safer and more sustainable transport network within the site. The walking, cycling and public transport networks can accommodate the forecast demand, and additional travel by these modes enhance the sustainable credentials of the proposed development.
- 6.19 The submitted Transport Assessment (Vectos, November 2021) confirms that the overall impact of the proposed development on the highway network will be limited and the net change of the proposed development would be negligible. Traffic modelling work

undertaken demonstrates the operation of the key junctions on the highway network does not alter significantly as a result of the proposed development.

- 6.20 The proposed development of a new commercial and residential development at CGIBP accords with the aims and objectives of LDP Policy. The LDP is founded on four strategic objectives; to respond to evidenced economic needs and provide the necessary infrastructure to deliver development, to respond to evidenced social needs, to deliver economic and social needs in a co-ordinated way that respects and enhances Cardiff's environment, and to create sustainable neighbourhoods that form part of a sustainable city.
- 6.21 Delivery of the strategy is dependent on the provision of new homes and jobs, with the key Strategic Sites identified in Policy KP2. These include a comprehensive development of circa 6,000 homes with employment and community uses in north-east Cardiff (SSF and SSG). SSG has been delivered, and part of SSF is currently under construction. The remainder of SSF is subject to a live planning application.
- 6.22 Policy T1 of the LDP states that in order to enable people to access services, employment and community facilities by walking and cycling, the council would support developments which incorporates high quality, sustainable design which makes a positive contribution to the distinctiveness of communities and places, permeable and legible networks of safe, convenient and attractive walking and cycling routes and connections and extensions to the Cardiff Strategic Cycle Network and routes forming part of the Cardiff Walkable Neighbourhoods Plan.
- 6.23 Additionally, key to the Local Development Plan is the Transport Strategy which is seeking to achieve a modal split of 50:50 in 2026 for all trips on the network. The proposed development is in line with this policy by offering real travel choice for a range of activities/ requirements.

Ecology

- 6.24 The submitted Ecological Assessment (David Clements Ecology, June 2021) confirms that the site does not contain or lie immediately adjacent to any statutory or non-statutory conservation designations.
- 6.25 The survey identifies hedgerows, scrub remnants, neutral grassland remnants and boundary watercourse as comprising key habitats of the site. The hedgerows and scrub have been found to support dormouse, a European Protected species, and all of these habitats otherwise offer habitats suited to a range of plant and fauna species which are

of conservation concern. The other habitats of the site, chiefly comprising artificial habitats such as brash-piles and a stone pile, are also likely to have at least some value for wildlife. The disturbed bare ground, hardstandings and stands of non-native invasive plant species however are considered to have negligible wildlife value.

- 6.26 Mitigation measures for this site include the incorporation of native tree and hedgerow planting and the inclusion of new habitat features, such as wildflower grassland and an attenuation pond. A native hedgerow is proposed to the west of the pond to mitigate the potential impact of artificial lighting on bats in the adjacent woodland. The mixture of amenity grassland, wildflower planting, and tree and hedgerow planting will result in a greater number of edges and habitats for wildlife and improve the quality of this area of public open space.
- 6.27 Given the outline nature of the application, the proposed enhancement and mitigation measures are considered capable of being adequately controlled at reserved matters stage.
- 6.28 For the above reasons, the proposed development of the site would not be unacceptably constrained by biodiversity and nature conservation issues in accordance with LDP policy EN6 of the LDP.

Landscape & Green Infrastructure

- 6.29 The site benefits from an extant outline planning permission for employment development and comprises a development plot located within an existing Business Park, situated within the defined settlement boundary. The proposals would be "read" as part of the existing landscape which comprises a number of large buildings of modern form and function.
- 6.30 The proposal benefits from an extensive Green Infrastructure Strategy Plan prepared by The Urbanists (November 2021) which includes new public open space on the eastern boundary of Plot 12 which will provide recreational space and improve the quality of the pedestrian route, as well as providing a buffer between the protected woodland and the stream to the east of the site. This area will provide play space, well connected to the wider public rights of way network, and a natural setting around the proposed attenuation pond. The pond will be incorporated as a feature in the public open space and will provide a stepping stone for wildlife travelling along the stream that runs along the eastern side of the site.

- 6.31 In addition to this, the existing west and northwest boundaries of Plot 12 which provide wildlife corridors and small areas of habitat are to be widened and planted with hedgerows and wildflower planting, improving the resilience of the habitat and providing them with protection from fragmentation and further damage. The wildlife strips will also provide additional opportunities for informal pedestrian and bicycle routes, thereby improving accessibility across the site.
- 6.32 The proposal also includes integration between blue and green infrastructure, allowing for maximisation of the proposed greenspace. It is proposed that drainage features within the open spaces are to be natural in their character with an appropriate planting mixture.
- 6.33 There is an aspiration to create a Hillside Park adjacent to Woodsy Close within Plot 14. The space will be more formal in its character and act as managed open amenity space to provide an attractive and usable edge to the proposed development. Maintaining this space an open landscaped area will ensure that important ecological connections are maintained north-south through the site.
- 6.34 In terms of connectivity throughout the site, the proposed wildlife area along the southern boundary of Plot 12, and the alignment of the tree-lined internal roads in the southern part of the site, allows easy connectivity to public open space and provides east-west stepping stones for animal species to travel along. The improved connectivity across the site will reduce habitat fragmentation and isolation of animal species. The integrated areas of habitat will also provide greater connectivity for pedestrians and cyclists moving north-west to south-east. Additionally, the bus egress through Beck Court will include tree planting to offset the loss of hedgerow and tree planting along St Mellons Road and include structural tree planting with suitable specification to ensure compatibility with bus movements and visibility requirements as well as incorporating rain gardens into soft landscape areas. The car park will also be enclosed with proposed hedging to reduce its visual prominence.
- 6.35 The majority of existing areas of Green Infrastructure along the boundaries are to be retained and additional areas of greenspace and tree planting are proposed and overall, there will be a considerable ecological enhancement/biodiversity net gain as a result of areas of new high-quality greenspace and the enhancement of existing greenspace in accordance with LDP policy KP16 of the LDP.

Trees

- 6.36 As the proposals largely relate to vacant development plots there will be minimal impact upon existing trees. The submitted Tree Survey and Arboricultural Report (ArbTWS,

November 2021) demonstrates that the proposal will not cause long term adverse impact to the amenity of the area through tree loss in accordance with LDP policy EN8 of the LDP.

- 6.37 The Tree Report confirms that circa 25m section of trees and c117m section of hedgerow are to be removed. All of these trees and hedgerows are of low quality that should not present a constraint to the proposed development. The removal of these trees and hedgerows can be readily mitigated through suitable compensatory tree planting, the details of which are considered capable of being adequately controlled by means of a suitably worded condition attached to any forthcoming consent for the site.
- 6.38 Mitigative tree hedgerow and shrub planting and aftercare will be required for the loss of the trees through a combination of different tree/shrub species and diverse nursery aged stock. Further to this, tree protection methods must be designed and implemented by an Arboriculturist to ensure no adverse impact occurs onto all the retained trees/shrubs during the entire construction phase.
- 6.39 For the above reasons, the proposals are considered to be compliant with LDP policy EN8.

Flood Risk and Drainage

- 6.40 The site is located within Flood Zone 1, as set out within the TAN 15 Flood Map for Planning. Flood risk is therefore not considered to represent a constraint in planning policy terms in accordance with LDP policy EN14 and TAN15.
- 6.41 The proposed Drainage Strategy for Plots 12 and 14, prepared by Shear Design (August 2021 and October 2021 respectively), and for the access proposals prepared by Vectos (November 2021) confirms how the proposals comply with Welsh Government guidance for Sustainable Drainage Systems (SuDS).
- 6.42 On Plots 12 and 14 a SuDS management hierarchy approach will be implemented to deliver the required improvement in water quality for surface water runoff from the development. The design includes use of rain-gardens, permeable paving and a geocellular attenuation tank to ensure the surface water design standards meet the SAB requirements for water re-use, water discharge control, interception for retention and water quality requirements in line with SUDS Standards.
- 6.43 For the proposed bus, pedestrian and cycle connections, the surface water drainage from the new carriageway of the bus link and new footpath must be treated,

attenuated, and discharged at controlled discharge rate to an existing drainage system. It has been proposed that a new footpath falls toward the carriageway which falls toward the adjacent rainwater garden. The surface water will fall on the footpath and carriageway and will be directed to the rainwater garden. Surface water will be treated in the rainwater garden and attenuated, also some water will infiltrate or evaporate before entering the perforated pipe located under the rainwater garden. Water then will follow the pipe to the manhole and discharge to an existing drainage system.

- 6.44 As Malthouse Avenue and Woodsy Close are existing highway, there is no requirement to provide additional water treatment and attenuation if the existing catchment area remain similar as before. As proposed changes to the existing junction will not increase the current catchment area of the drainage system it has been proposed to utilise an existing drainage system located in the road for this element of the proposals.
- 6.45 Given the outline nature of the application, the detailed design of the proposed drainage scheme is considered to be capable of being adequately controlled at reserved matters stage. For the above reasons, the proposals are considered to be compliant with flood risk and drainage policy and guidance in accordance with LDP policy EN14 and TAN15.

Built Heritage

- 6.46 The site contains no designated built heritage assets and is not located within an archaeologically sensitive area. Accordingly it is not considered that an archaeological assessment is required given that the plots comprise vacant development land where earthworks and ground preparation have previously taken place in accordance with LDP policy KP17

Noise

- 6.47 The proposed uses proposed are compatible with the surrounding residential and employment uses in terms of amenity impacts and noise generation in accordance with LDP policy EN13.

7.0 CONCLUSIONS

- 7.1 Having set out the circumstances of the proposal in terms of Development Plan policy and other material considerations, an overall planning balance has to be struck. The starting point in considering this balance is the presumption in favour of sustainable development.
- 7.2 The proposal would broaden the mix of uses within the Business Park as part of a high quality, mixed-use scheme on vacant development plots in a sustainable location.
- 7.3 The scheme would bring vacant/underused land into beneficial use with associated regeneration benefits, would promote the efficient use of land, make a positive contribution to housing supply, and deliver a resource efficient and climate responsive design. The scheme would help combat climate change by delivering landscape and SuDS proposals.
- 7.4 The provision of more active uses along the newly created sustainable transport link to the North East Cardiff Strategic Site should all be warmly welcomed, as with the provision of landscape, public realm and highway improvements within the Business Park. These will help ensure the Strategic Site connects successfully with the Business Park and create a vibrant, landscaped 'place' with significantly enhanced biodiversity befitting the site's location, in direct contrast to the existing vacant development plots.
- 7.5 The proposals have been assessed against local and national policies and guidance and are considered to be policy compliant, with no demonstrable or compelling reasons which indicate sufficient harm to warrant refusal of the application, with all material factors, policy implications and issues raised through the pre-application engagement with the Council having been satisfactorily addressed.
- 7.6 It is, therefore, considered that the proposals are an acceptable development which meets the requirement of Section 38(6) of the 2004 Act and the Well-being of Future Generations (Wales) Act 2015 and therefore should be approved.